From: Liu, Wei-Ting
To: Attalla, Yousry
Cc: Sheplak, Scott
Subject: Hillsborough Title V Permit Revision
Date: Friday, June 15, 2012 3:08:51 PM

Hello Joe,

Per our phone conversion, here is a summary of what we're trying to revise with Hillsborough's Title V Permit.

Project Summary: Hillsborough County wishes to revise the Title V and PSD/Air Construction permits so that they are allowed to burn biosolids. (Biosolids – dewatered up to at least 14% solids).

The biggest reason for the request is that disposal of biosolids is becoming tougher and the County wants to have greater flexibility in what they can do with biosolids. Having the ability to combust the biosolids in their waste-to-energy plant is will ease County operations and will save money in some instances. However, the current title V permit does not allow "sewage sludge" as a possible fuel. Well, one can argue that "sewage sludge" is the same as "biosolids."

Now, I know that Lee County RRF recently had their permits revised so that sewage sludge isn't listed as a prohibited fuel anymore. We wish to do with the same with Hillsborough's permit. I have looked at the biosolids heavy metal characteristics and estimated possible emission increases. There should not be a noticeable difference in terms of emissions. I've looked at the regulations and there isn't a strict prohibition against burning of biosolids. I will put this in a detailed report.

I understand that this will take an air construction permit since the permit condition exists for Units 1, 2, 3 and 4 in their PSDs.

So Joe, I would like some guidance from you administratively so I can give you the information that you need when I send in the permit package. Here are some of the administrative things I need to be clear on:

1.)I'm using the long form and checking the box "Air Construction permit and Title V Permit revision, incorporating the proposed project." Is this proper?

2.)I don't believe that there is a fee associated with this since it's a revision of a Title V Operations Permit.

3.) Do I send the permit package to Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399? (Did the address change?)

I've copied Scott Sheplak on this email since he was the pervious permit writer for Lee County during their permit revision to allow biosolids as a fuel. I believe that this permitting process will be similar, if not exactly the same, to Lee's previous permitting process.

We’re hoping to put a package together sometime by the end of the month for application submittal.

I welcome any thoughts and ideas.

Sincerely,

Wei Liu

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