From:	Hibbard, Cynthia
To:	Linero, Alvaro
Cc:	Attalla, Yousry; Hauck, Paul; Liu, Wei-Ting; Strobridge, Daniel
Subject:	(Archived w/ Attachments) RE: Hillsborough Biosolids - Emissions, Waste and Steam
Date:	Friday, October 26, 2012 5:33:28 PM
Attachments:	image001.jpg Hillsboro waste througput and steam production.xlsx Hillsboro Historic AOR Emission Rates.xlsx

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Al –

Thank you very much for talking with us yesterday and today, and guiding us through what you have requested for the Hillsborough WTE Biosolids air construction permit:

1) Reasonable Assurance that CO emission limits will be met for the higher moisture (lower HHV) fuel with 10 percent biosolids; and
2) Netting Analysis for PSD Applicability

For 1), we believe that after mixing in up to 10 percent biosolids with the MSW, the combined fuel heat content will remain comfortably above the design value of 4667 Btu/lb. The heat content of the MSW has been averaging about 5245 Btu/lb over the last two years. With the biosolids, this would be reduced about 8 percent, as you estimated, to about 4820 Btu/lb. On average, therefore, we do not expect this addition to affect the Facility's emissions performance. In order to address your concern about possible slugs of moist material affecting continuous CO compliance, the Facility operators will use Good Combustion Practices, good mixing practices, and control of air pollution control equipment reagent injection rates to manage all regulated pollutants in compliance with permitted concentrations.

For 2), we will submit a letter requesting a waiver of the 90-day permit processing clock to provide you this additional information. We estimate that we will need two weeks (until Nov. 9th) to collect the information we need from Covanta, conduct the calculations, and then have them reviewed by Covanta and the County.

In the meantime, we have attached the waste throughput and steam production data, and the historic AOR emission rate information. The historic AOR emission rate spreadsheet is set up with filters on each of the columns, so you can display data for specific units, years and pollutants. The analysis of steam and waste throughput shows that for Units 1-3, the period of March 2005 through February 2007 was the peak 24-month period in the 10 years preceding the permit application submission. For Unit 4, the peak 24-month period was August 2010 through July 2012. We plan to use these periods for calculating the Baseline Actual Emission Rates. We will develop emission factors for each period based on tons pollutant emitted / ton of reference waste processed (or MMBtu/hr of heat input; or thousand lbs of steam generated). Since steam data are available for each unit, we will likely use the steam data.

Thanks.

- Cynthia

Cynthia Strong Hibbard | Vice President, Air & Climate Discipline Leader | CDM Smith | 50 Hampshire Street, Cambridge, MA 02139 | Tel: 617.452.6244 | Cell: 617.797.2462 | hibbardcs@cdmsmith.com

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From: Linero, Alvaro [mailto:Alvaro.Linero@dep.state.fl.us]
Sent: Thursday, October 25, 2012 4:20 PM
To: Liu, Wei-Ting; Hibbard, Cynthia
Cc: Attalla, Yousry
Subject: RE: Emissions, Waste and Steam

Hi Wei and Cynthia.

The waste and steam throughput you sent me were Units 1+2+3 until 4 started.

Is it possible to continue with just 1+2+3 but do Unit 4 separately?

Do you have data from AOR's for Units 1, 2 and 3 for best years (within last 10 years)?

Otherwise we will need to dig them out of our database.

Thanks.

Al.

A. A. Linero, P.E.
Florida Department of Environmental Protection
Office of Permitting and Compliance
850-717-9076

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com

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From: Liu, Wei-Ting [mailto:LiuWT@cdmsmith.com]
Sent: Thursday, October 18, 2012 9:41 AM
To: Linero, Alvaro
Subject: RE: Can you call?

Take a look at this and see if this will satisfy on past estimate of solid waste throughput.

From: Linero, Alvaro [mailto:Alvaro.Linero@dep.state.fl.us]
Sent: Thursday, October 18, 2012 9:31 AM
To: Liu, Wei-Ting
Cc: Gorrie,Jason; Hauck, Paul
Subject: Can you call?

Hi Wei.

Can you call this morning?

I am reviewing evaluation prepared by our engineer so we can issue draft decision soon (like middle of next week)..

I may need to estimate future emissions from the facility after the change.

So I might need some past and future estimates of solid waste throughput and steam production.

Have a look at theattached Technical Evaluation for the draft Pinellas County PSD permit that was distributed last week.

Refer to pages 10-14.

It is available at: http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1030117.009.AC.R_pdf.zip

Thank you.

Al Linero

A. A. Linero, P.E.
Florida Department of Environmental Protection
Office of Permitting and Compliance
850-717-9076

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.