



LEE COUNTY

SOUTHWEST FLORIDA

DIVISION OF SOLID WASTE

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TO: TRINA Vielhaver FAX NO.: 850-921-9533

FROM: Lindsay Sanger PHONE NUMBER: _____

DATE: 5/19/03 NO. OF PAGES: 3
INCLUDING THIS ONE

SUBJECT: Lee Co. SWIF.

SPECIAL INSTRUCTIONS/MESSAGE: PSD-157C

PLEASE CONTACT THIS OFFICE IMMEDIATELY IF TRANSMITTAL IS NOT RECEIVED PROPERLY. THANK YOU.



LEE COUNTY
SOUTHWEST FLORIDA

BOARD OF COUNTY COMMISSIONERS

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May 16, 2003

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Ms. Trina Vielhauer, Director
Bureau of Air Regulations
Department of Environmental Protection
2600 Blair Stone Rd. MS 5500
Tallahassee, Florida 32399

**Subject: Lee County Solid Waste Energy Recovery Facility
Draft Permit No. PSD-FL-151C**

Dear Ms. Vielhauer:

In accordance with our telephone conversation of this date, the County understands that the following items represent the Department of Environmental Protection's (Department) position regarding the subject permit:

- 1) The Department agrees that the maximum heat input for the County's Unit 3 will be 291.5 MMBTU/Hr.
- 2) The permit limit for mercury for Unit 3, on a mass basis, will be 0.0168 lb/hr and 0.0736 tons / year. The County will be allowed to eliminate one test run per year (submit two valid test runs) in the event that the single run yields an inlet Hg concentration above 0.45 mg/dscm @ 7% O2 and the carbon injection system is operating properly.
- 3) The NOx emission limit for Unit 3 will be 140 ppm (corrected to 7% O2) for the first year of operation. The NOx emission limit for Unit 3 will be 110 ppm (corrected to 7% O2) beginning the second year of operation. The averaging period for these limits will be either on a 12 (actual operating) month rolling average or a 12 period rolling average, each period consisting of 30 unit operating days.
- 4) The emission limit for SO2 will remain the same as written in the draft permit.
- 5) The emission limits for CO will remain the same as in the draft permit but the 80 ppm (corrected to 7% O2) limit will be based on a calendar year average. However, the Department may consider an averaging period for this limit as in the same manner as is used for NOx described in item 3, above.

Ms. Vielhauer
May 16, 2003
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- 6) The emission limit for NH₃ for the first year of operation will be 50 ppm. Thereafter, the NH₃ limit may be reduced by the Department, based on stack test data collected by the County during the first year of operation. Any such reduction will be established such that the County, with proper unit operations of Unit 3, can continuously meet the new NH₃ limit (while meeting the NO_x emission limits).

As a final note, we want to confirm our understanding that the opacity limit will be based on the opacity CEM and/or Method 9. Therefore, a detached plume will not be considered a violation. It is the County's intent to minimize any plume to the extent possible, while meeting the NO_x limit. The County will not attempt to challenge the NO_x limit based on a visible plume.

The County is also interested in reviewing the draft PSD permit, as revised, based on our conversations and our comments/requests dated April 25, 2003. If there is anything that the County can do to expedite this process, please let me know.

Sincerely,



Lindsey J. Sampson, Director
Solid Waste Division

Cc: David Owen, Chief Ass't. County Attorney
Jim Lavender, Director Public Works
Lee Project Team
Howard Rhodes, DEP Division of Air Resources Management Director