

Sheplak, Scott

-file-

From: Dunbar, Kirk [Kirk.Dunbar@hdrinc.com]
Sent: Monday, March 07, 2011 12:30 PM
To: Sheplak, Scott; sampsolj@leegov.com
Cc: Castro, Don; Holtom, Jonathan; Perrin, Kyle
Subject: RE: Lee County Resource Recovery Facility (RRF), File Number 0710119-007-AV
Attachments: RE: Fire Pump & Diesel Engine Information

Scott – Attached is an email with a table listing the engines associated with items 17 and 18. The table lists the engine model number, model year, manufacturer, and size (please note that the size of the last fire pump engine is actually 64 HP versus the 79 HP value listed in the current permit).

Based on the model years for the diesel generator and Fire Pumps 1 and 3, none of the engines for those units are subject to 40 CFR Part 60, Subpart IIII (NSPS for Compression Ignition engines) and they are all existing emergency engine units for Subpart ZZZZ purposes. As such, no notification requirements applies to them and their compliance deadline is May 3, 2013. As of that date, they will be subject only to the regular maintenance requirements of 2c, Item 1, of Subpart ZZZZ, as well as the requirement to minimize time idling. They will also be subject to the applicable monitoring, recordkeeping, and reporting requirements as of that date.

We are still working to track down the purchase date of Fire Pump 2 to determine its status for Subpart IIII and Subpart ZZZZ applicability. That information will be provided as soon as we have it.

Thanks - Kirk

M. Kirk Dunbar
Air Quality Engineer

HDR ONE COMPANY | Many Solutions
701 Xenia Avenue South | Suite 600 | Minneapolis, MN | 55416
Phone: 763.591.5476 | Fax: 763.591.5413 | Email: kirk.dunbar@hdrinc.com

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Monday, March 07, 2011 11:03 AM
To: Dunbar, Kirk; sampsolj@leegov.com
Cc: Castro, Don; Holtom, Jonathan; Perrin, Kyle
Subject: RE: Lee County Resource Recovery Facility (RRF), File Number 0710119-007-AV

Jon Holtom asked about the status of the engine response. Maybe someone can jump on this asap so that we can wrap it up? Thanks.

From: Dunbar, Kirk [mailto:Kirk.Dunbar@hdrinc.com]
Sent: Thursday, March 03, 2011 1:23 PM
To: Sheplak, Scott
Cc: Castro, Don; sampsolj@leegov.com; Holtom, Jonathan; Perrin, Kyle
Subject: RE: Lee County Resource Recovery Facility (RRF), File Number 0710119-007-AV

Scott – I have model years for some of the engines in 17 and 18, but just realized that for Subpart ZZZZ purposes, we also need the date construction commenced. I do not have that information, but just sent a request for the date of either the contract or invoice that was issued for purchase of each engine. Based on the definition of “commence” under 40 CFR 63.2 (*Commenced* means, with respect to construction or reconstruction of an affected source, that an owner or operator has undertaken a continuous program of construction or reconstruction or that an owner or operator has entered into a contractual obligation to

undertake and complete, within a reasonable time, a continuous program of construction or reconstruction.), this should be a reasonable first cut at determining when construction of each commenced.

I was focused on model year, since that is what the NSPS applicability is based on, but forgot that Subpart ZZZZ applicability depends on the commenced construction date. I don't know when I will be able to get that information – I have sent a request out to the facility. I'll keep you updated as I get information.

Sorry for the delay - Kirk

M. Kirk Dunbar
Air Quality Engineer

HDR ONE COMPANY | Many Solutions
701 Xenia Avenue South | Suite 600 | Minneapolis, MN | 55416
Phone: 763.591.5476 | Fax: 763.591.5413 | Email: kirk.dunbar@hdrinc.com

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Thursday, March 03, 2011 9:59 AM
To: Dunbar, Kirk
Cc: Castro, Don; sampsolj@leegov.com; Holtom, Jonathan
Subject: RE: Lee County Resource Recovery Facility (RRF), File Number 0710119-007-AV

Good, so that leaves "17." and "18."

From: Dunbar, Kirk [mailto:Kirk.Dunbar@hdrinc.com]
Sent: Thursday, March 03, 2011 10:53 AM
To: Sheplak, Scott
Cc: Castro, Don; sampsolj@leegov.com; Holtom, Jonathan
Subject: RE: Lee County Resource Recovery Facility (RRF), File Number 0710119-007-AV

Scott – To get the process rolling, please see the following regarding the non-stationary engines:

On December 5, 2008, USEPA published a guidance memo (see attached document titled "Subpart ZZZZ Memo.pdf") in which they stated that engines on mobile equipment that is periodically moved are not subject do not meet the applicability of either 40 CFR Part 60, Subpart IIII or Part 63, Subpart ZZZZ. Based on this memo, neither Subpart IIII nor Subpart ZZZZ apply to items 13, 16, or 21 listed below, each of which is moved periodically during use as indicated by their designation as being portable. Therefore, no further information is provided for these engines at this time.

I have the information for the stationary engines, but need to review it and the rule. As we discussed, I will send that later today or tomorrow morning.

Kirk

M. Kirk Dunbar
Air Quality Engineer

HDR ONE COMPANY | Many Solutions
701 Xenia Avenue South | Suite 600 | Minneapolis, MN | 55416
Phone: 763.591.5476 | Fax: 763.591.5413 | Email: kirk.dunbar@hdrinc.com

From: Sheplak, Scott [mailto:Scott.Sheplak@dep.state.fl.us]
Sent: Thursday, March 03, 2011 9:07 AM
To: Dunbar, Kirk
Cc: Castro, Don; sampsolj@leegov.com; Holtom, Jonathan
Subject: RE: Lee County Resource Recovery Facility (RRF), File Number 0710119-007-AV

Kirk Dunbar:

Per our telephone conversation of this a.m. you plan to provided a response to this request (e-mail below) sometime tomorrow. This is the last piece (engines) that I need to integrate into the renewal project.

By the way, good job on the requested changes/recommendations document submitted in the permit renewal application. I went through it and it was very helpful.

Thank you!

Sincerely,

Scott M. Sheplak, P.E.
DEP - Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399

scott.sheplak@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Sheplak, Scott

Sent: Tuesday, February 08, 2011 11:49 AM

To: 'Kirk.Dunbar@HDRInc.com'

Cc: Castro, Don; 'sampsolj@leegov.com'

Subject: Lee County Resource Recovery Facility (RRF), File Number 0710119-007-AV

I have a follow up question on engines at the facility. Appendix I-1, List of Insignificant Emissions Units and/or Activities, attached to Permit No. 0710119-006-AV, lists the following engines:

- " ...
13. 1000-hp Portable Diesel Wood Grinder (non-road engine)
...
16. 325-hp Portable Diesel Tire Shredder (non-road engine)
17. 330-hp Diesel Generator
18. Diesel Fire Pumps (3): 305-hp, 300-hp, 79-hp
...
21. 63- hp Portable Diesel Welding Machine (non-road engine)
..."

Follow up item(s):

1. Engines - Federal Regulations, Recently Promulgated. The U.S. EPA promulgated changes to the "RICE MACT" a.k.a. 40 CFR 63 Subpart ZZZZ or "4-Z," on March 3, 2010. These engines may be regulated under the recently amended RICE MACT. If so they'll need to go into the permit as 'regulated' emissions units.

- a) Please provide key applicability descriptors like 'existing,' 'new,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, etc.
- b) Are these engines regulated under the March 3, 2010, RICE MACT changes? If so, what are the specific applicable requirements?
- c) For any engines regulated under the NSPS 40 CFR 60 Subpart IIII, please provide the engine displacements in liters (L).

The engine federal regulations along with fact sheets are posted on the following U.S. EPA web site:

<http://www.epa.gov/ttn/atw/combust/list.html>.

By the way, U.S. EPA recently created an applicability flowchart and tables for the RICE MACT and posted them on their web site at:

<http://www.epa.gov/ttn/atw/rice/ricepg.html>

Under "Implementation Information"