

**Sheplak, Scott**

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**From:** Dunbar, Kirk [Kirk.Dunbar@hdrinc.com]  
**Sent:** Thursday, January 19, 2012 11:18 AM  
**To:** Sheplak, Scott; Castro, Don  
**Cc:** 'Sampson, Lindsey'; 'Gorrie, Jason'  
**Subject:** RE: MWC Hg emission standard applicability question

Scott – Based on the commenced construction date of September 11, 2005, the current federal mercury (Hg) concentration standard for Lee County Municipal MWC Unit 3 is found in 40 CFR §60.52b(a)(5)(i):

(i) For affected facilities that commenced construction, modification, or reconstruction after September 20, 1994 and on or before December 19, 2005, the emission limit is 80 micrograms per dry standard cubic meter or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent.

This information is consistent with our response to RAI received by FDEP on April 2, 2008 (although the regulatory citation was not provided in that submittal) in connection with the Title V revision to incorporate Unit 3.

Please let us know if there is any additional information that you need in regards to this permitting effort.

Kirk

**M. KIRK DUNBAR**

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**From:** Sheplak, Scott [<mailto:Scott.Sheplak@dep.state.fl.us>]  
**Sent:** Thursday, January 19, 2012 9:29 AM  
**To:** Dunbar, Kirk; Castro, Don  
**Cc:** 'Sampson, Lindsey'; 'Gorrie, Jason'  
**Subject:** MWC Hg emission standard applicability question

Good morning. I am going through the comments on the Title V permit renewal & the PSD AC permit revision. I have an applicability question for you.

<p><u>Unit Description:</u></p>
<p>Lee County Resource Recovery Facility (LCRRF)</p>
<p>MWC Unit 3</p>
<p><u>Important Dates:</u></p>
<p>Commenced construction on September 11, 2005</p>
<p>Commenced commercial operation on August 18, 2007</p>

What is the federal (U.S. EPA) mercury (Hg) concentration standard for the Lee County MWC Unit 3? Please provide a federal regulation basis. Thank you for your review in advance.

Sincerely,