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August 15, 2011

Sent via Electronic Mail - Read Receipt Requested

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Mr. Lindsay J. Sampson
Director
Lee County Solid Waste Division
10500 Buckingham Road, Suite 200
Fort Myers, Florida 33905

Re: Request for Additional Information No. 1
File Numbers: 0710119-007-AV, Title V Air Operation Permit Renewal Application
0710119-008-AC/PSD-FL-151-E, Air Construction Permit Revision
0710119-009-AC, Air Construction Permit, Biosolids Request
Lee County Resource Recovery Facility (LCRRF)

Dear Mr. Sampson:

On July 22, 2011, the Department received a request to modify several previously issued Prevention of Significant Deterioration (PSD) permits, PSD-FL-151-B&D and to process it concurrently with the Title V air operation permit renewal application for the subject facility. The Lee County Resource Recovery Facility is located at 10500 Buckingham Road, Fort Myers in Lee County, Florida.

In order to continue processing the application, the Department needs the additional information requested below. Should a response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

A. Request to Modify Miscellaneous Underlying AC/PSD Permit Conditions Project (PSD permit "clean up" project)

File Numbers: 0710119-007-AV, Title V Air Operation Permit Renewal Application
0710119-008-AC/PSD-FL-151-E, Air Construction Permit Revision

The Department understands that the July 22, 2011 submitted request was intended to modify miscellaneous underlying air construction (AC)/PSD permit conditions that had been requested to be changed in the Title V air operation permit renewal application.

1. Fluoride, Sulfuric Acid Mist and VOC Emissions from MWC Units 1 & 2 and Hydrogen Fluoride Emissions from MWC Unit 3. The modification request stated that "historical test data" indicates these air pollutants have been emitted at levels less than the PSD "significant emission rates" defined in Rule 62-210.200, Florida Administrative Code (F.A.C.). Please provide the supporting stack test data in the form of a summary.

Note: The most recent PSD permit with BACTs for new municipal waste combustors (MWCs) do limit VOC emissions (see the Palm Beach Renewable Energy Facility No. 2 under PSD-FL-413).

[Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]

B. Request to Burn “Biosolids” in the MWCs Project

File Number: 0710119-009-AC, Air Construction Permit

The request to modify miscellaneous underlying AC/PSD permit conditions now includes a new request to burn “biosolids” in the MWCs. The request to burn “biosolids” was not in the Title V air operation permit renewal application received.

To keep the Title V air operation permit renewal expedited, the request to burn “biosolids” has been separated into its own project to be processed separately from the PSD permit “clean up” project. The “biosolids” request has been assigned File Number 0710119-009-AC.

Additional information is needed to process this new request through an AC/PSD permit modification concurrently with a Title V air operation permit application.

1. Applicants for Title V air operation permits are required to identify applicable requirements (see Rule 62-213.420, F.A.C. and **Section I. Additional Requirements for Title V Air Operation Permit Applications 1. Identification of Applicable Requirements** of DEP Form No. 62-210.900(1) {see page 28}).

Because the burning of “biosolids” in the MWCs was not specifically addressed in the Title V air operation permit renewal application submitted, please identify the specific applicable requirements to which the burning of “biosolids” in the MWCs are subject to. As part of the response, specifically address the applicability of the following federal air regulations to the burning of “biosolids” in the MWCs:

- a. 40 Code of Federal Regulations (CFR) 60, Subpart Cb, Emissions Guidelines (EG) and Compliance Times for Large Municipal Waste Combustors;
 - b. 40 CFR 60, Subpart Eb, New Stationary Source Performance Standards (NSPS) for Large Municipal Waste Combustors;
 - c. 40 CFR 60, Subpart MMMM, EG for Sewage Sludge Incineration Units;
 - d. 40 CFR 60, Subpart LLLL, NSPS for Sewage Sludge Incineration Units; and,
 - e. 40 CFR 61, Subpart E, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Mercury.
2. The request did not provide any details on the effect on air pollutant emissions from the burning of “biosolids” in the MWCs. Please provide the following additional information on the effect on air pollutant emissions from the burning of “biosolids” in the MWCs:
 - a. Are there any new or increases in air pollutants emitted? If so, in what quantity in “pounds/hour” and “tons per year (TPY)”? Include all supporting calculations and references. [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
 - b. From the burning of “biosolids” in the MWCs, which air pollutants will be controlled by the existing air pollution control devices and/or measures? [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
 - c. Do you anticipate any effects on the existing air pollution control devices and/or measures from the burning “biosolids” in the MWCs? [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
 3. The July 22, 2011 cover letter to the request indicated there have been no “adverse impacts” from WTE facilities burning “biosolids” in other sections of the country [U.S.] and in Europe. Please provide literature and/or reference documents to support this claim. [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
 4. Have any trail burns of “biosolids” been conducted on MWCs in the U.S.? Have any reports been prepared on the effects on air pollutant emissions from the burning of “biosolids” in MWCs? If so, please provide. [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]

5. Where do you plan to bring “biosolids” from and in what quantity in “pounds” and “tons?” Where do the “biosolids” currently go? [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
6. Please address pathogen and vector concerns from the handling & storage and the combustion of “biosolids” in the MWCs at the LCRRF. [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
7. Are there any analyses available on the constituents of the “biosolids?” Please provide an analysis for the “biosolids” you wish to burn to include at a minimum: the heat content (Btu/lb), % ash content, % water content, % carbon content, % sulfur content, % metal constituents like mercury, etc. [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
8. How do you plan to bring “biosolids” to the LCRRF? How do you plan to handle and store it at the LCRRF? Will there be any air pollutant emissions from any handling and storage activities? [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
9. How do you plan to introduce “biosolids” into the individual MWCs? [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]
10. Please provide process flow/operations diagrams for the handling & storage and the combustion of “biosolids” at the LCRRF. [Rules 62-4.210, Construction Permits and 62-4.070(1)&(3), F.A.C., Reasonable Assurance.]

Please submit the requested additional information for the “biosolids” project separately from the PSD permit “clean up” project.

The Department will resume processing the applications after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit and an air construction permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the applications, please include a new certification statement by the responsible official (R.O.).

Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within **ninety (90)** days or provide a written request for an additional period of time to submit the information.

If you should have any questions, feel free to contact me by telephone at 850/717-9074 or by e-mail at scott.sheplak@dep.state.fl.us.

Sincerely,



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