

# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

August 14, 2003

CERTIFIED MAIL – Return Receipt Requested

Mr. E. David Fernandez  
Utility Director  
City of Key West  
Southernmost Waste-to-Energy Facility  
P. O. Box 1409  
Key West, Florida 33041-1409

Re: Applicable Requirements  
3<sup>rd</sup> Notice

Dear Mr. Fernandez:

On October 8, 2002, and January 21, 2003, a letter was sent to you requesting a list of the specific applicable requirements of 40 CFR Part 60, Subparts A and BBBB, for your facility and affected emissions units. On August 11<sup>th</sup>, we received your letter, dated August 6<sup>th</sup>, which updated the progress that is being made toward coming into compliance with 40 CFR 60, Subpart BBBB, but did not address the applicable requirements.

Your initial Title V Permit was issued/effective on December 31, 1999. On December 6, 2000, the regulations at 40 CFR Part 60, Subpart BBBB, Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or before August 30, 1999, became applicable to your facility. Since the additional applicable requirements became applicable to your facility and there is more than 3 (three) years left on your permit, as of the effective date of the new regulations, the Department is required to open your Title V Permit for cause and install these requirements in accordance with Rules 62-4.080(1) and 62-213.430(4), F.A.C., and 40 CFR 70.7(f). In order to incorporate the specific applicable requirements of 40 CFR Part 60, Subparts A and BBBB, into your Title V Permit, please provide the specific rule cites of these applicable regulations for your facility and affected emissions units.

If there are any questions, please give Bruce Mitchell a call, at 850/413-9198, or write to me at the above letterhead.

Sincerely,

Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

cc: Scott M. Sheplak, P.E., BAR

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Signature x <i>Kent Irish</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee
1. Article Addressed to: Mr. E. David Fernandez Utility Director City of Key West Southernmost Waste-to-Energy Facility P.O. Box 1409 Key West, Florida 33041-1409	B. Received by (Printed Name) _____ C. Date of Delivery <b>8/18/03</b>
2. Article Number (Transfer from service label) 7000 2870 0000 7028 1372	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No
PS Form 3811, August 2001	3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
Domestic Return Receipt	4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes 102595-02-M-1540

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
7000 2870 0000 7028 1372	<b>OFFICIAL USE</b> Mr. E. David Fernandez, Utility Director
Postage \$ _____ Certified Fee _____ Return Receipt Fee (Endorsement Required) _____ Restricted Delivery Fee (Endorsement Required) _____ Total Postage & Fees \$ _____	Postmark Here
Sent To Mr. E. David Fernandez, Utility Director Street, Apt. No., or PO Box No. P.O. Box 1409 City, State, ZIP+4 Key West, Florida 33041-1409	
PS Form 3800, May 2000 See Reverse for Instructions	



August 6, 2003

THE CITY OF KEY WEST

P.O. BOX 1409  
KEY WEST, FL 33041-1409  
www.keywestcity.com

RECEIVED

AUG 11 2003

BUREAU OF AIR REGULATION

Mr. John Glunn  
FDEP  
Office of Policy Analysis and  
Program Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Final Control Plan compliance schedule  
Southernmost Waste to Energy Facility  
Permit No. **0870047-001 AV**

Dear Mr. Glunn:

The City of Key West (City) has submitted a Final Control Plan for the Southernmost Waste-to-Energy Facility (SWTE). This plan was submitted to the FDEP on September 26, 2001. The compliance date was requested as March 1, 2004. We have since sent a request to the FDEP in a letter dated September 17, 2002 to request a change of the final compliance date to October 30, 2005. The reasons for that request are outlined in the September 17<sup>th</sup> letter.

A technical advisory committee (TAC) has been approved and assembled by the City Commission to advise the City of the best options for our future solid waste needs. Mr. Bill Hinkley, Solid Waste Bureau Chief of the FDEP, is a voting member on this TAC. Our last update stated that City staff and the TAC are working on an "accelerated" schedule to get a "final" decision from the City Commission in July of 2003. This milestone was not achieved. We still believe that there is a good chance that the City may choose to change the current way we handle our solid waste, most likely in the form of a transfer station. We are in the process of releasing a RFP for hauling and disposal services for the City. This RFP will be the last bit of information the TAC and commission needs to make a decision for the future use of the facility. We expect the City to be ready to make a final decision by December of 2003. According to our conversations with our consultants as well as the vendors that submitted budgetary proposals all agree that we can complete the upgrade in approximately 18 months. This makes for a very tight timeline for meeting the compliance date, but we believe, achievable.

We will continue to proceed as quickly as possible with the TAC process, and we will give you another progress update in October 2003.

We wish to thank you for your understanding and cooperation in this matter.

Submit Final Control Plan	<b>Completed</b>
Award Contracts	<b>January 31, 2004</b>
Begin Onsite Construction	<b>April 30, 2004</b>
Complete Onsite Construction	<b>May 31, 2005</b>
Achieve Final Compliance	<b>October 30, 2005</b>

Please contact my office if you have any questions or need any further information.

R.B. Havens



Plant Manager

Southernmost Waste-to-Energy Facility

(305) 293-6409

[rbhaven@keywestcity.com](mailto:rbhaven@keywestcity.com)

cc: Scott M. Sheplak, P.E., FDEP Tallahassee  
Ronald Blackburn, FDEP Fort Meyers  
Jim Edds, FDEP Marathon  
File



RECEIVED

FEB 24 2003

February 20, 2003

THE CITY OF KEY WEST

P.O. BOX 1409  
KEY WEST, FL 33041-1409  
www.keywestcity.com

BUREAU OF AIR REGULATION

Mr. John Glunn  
FDEP  
Office of Policy Analysis and  
Program Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Final Control Plan compliance schedule  
Southernmost Waste to Energy Facility  
Permit No. **0870047-001 AV**

Dear Mr. Glunn:

As per our phone conversation, the City of Key West (City) had previously submitted a Final Control Plan for the Southernmost Waste-to-Energy Facility (SWTE). This plan was submitted to the FDEP on September 26, 2001. The compliance date was requested as March 1, 2004. We have since sent a request to the FDEP in a letter dated September 26, 2002 to request a change of the final compliance date to October 30, 2005. The reasons for that request are outlined in the September 26<sup>th</sup> letter.

It is our understanding that in order to change the compliance date the department will have to submit a revised plan to the EPA under the Clean Air Act Section 111(d) for approval, and that the FDEP is willing to make this request.

The timeline shown in this letter is the same as was requested in the September 26, 2002 letter and should meet the needs of the City to get the facility into compliance on time. However, the City is currently investing alternative options to continued operations of the SWTE.

A technical advisory committee (TAC) has been approved and assembled by the City Commission to advise the City of the best options for the future solid waste needs. Mr. Bill Hinkley, Solid Waste Bureau Chief of the FDEP, is a voting member on this TAC. City staff and the TAC are working on an "accelerated" schedule to get a "final" decision from the City Commission in July of 2003. We believe that there is a good chance that the City may choose to change the current way we handle our solid waste, most likely in the form of a transfer station. Given this uncertainty, we agree with the FDEP that waiting for a final decision from the City Commission prior to requesting a compliance date change from the EPA is prudent, with the understanding that the FDEP has no reason to take exception with this timeline or approved plan. This would save double work and expense for the FDEP, EPA and the City.

We will continue to proceed as quickly as possible with the TAC process, and we will give you regular progress updates, once a month.

We wish to thank you for your understanding and cooperation in this matter.

Submit Final Control Plan	<b>Completed</b>
Award Contracts	<b>July 31, 2003</b>
Begin Onsite Construction	<b>April 30, 2004</b>
Complete Onsite Construction	<b>May 31, 2005</b>
Achieve Final Compliance	<b>October 30, 2005</b>

Please contact my office if you have any questions or need any further information.

R.B. Havens



Plant Manager

Southernmost Waste-to-Energy Facility

(305) 293-6409

[rbhaven@keywestcity.com](mailto:rbhaven@keywestcity.com)

cc: Scott M. Sheplak, P.E., FDEP Tallahassee  
Ronald Blackburn, FDEP Fort Meyers  
Jim Edds, FDEP Marathon  
File

**BEST AVAILABLE COPY**

1/27/03

Larry,

Here's a copy of the letter from the  
City of Key West Southernmost Waste-to-Energy  
facility with a new final compliance date -  
October 30, 2005.

The compliance schedule in the III(d) plan  
has a final compliance date of March 1, 2004.  
Our August 29, 2002 letter was in regard to  
reopening the Title V permit.

Scott

copy to: Trina



# The City of Key West Southernmost Waste To Energy Facility

Phone: (305) 293-6409

Fax: (305) 293-6415

Date: 1/27/2003

To: Bruce Mitchell

Fax: (850) 922-6979

Re: Final Control Plan

Sender: Katy Boyer, Utilities Administrative Assistant

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2

**You should receive 14 page(s) including this cover.  
Please call Katy at (305) 293- 6409 if you do not receive all  
pages.**

---

*Bruce  
it pulled 2 pgs  
through at once  
this is 2nd pg  
of h. George letter*



Water Pumps. The pumps are to be variable speed, positive displacement type, to deliver water to the Evaporative Cooler Tower.

The system will have two of each of the above-mentioned devices (two trains) sharing one common stack (existing).

In addition to the above, the following sub-systems are required for each pollution control system.

- Structural Supports and Platforms
- Instrumentation and Controls
- Expansion Joints and Ductwork
- Compressor
- End Product Handling System (existing)
- One (1) common lime storage and delivery system
- One (1) common activated carbon storage and delivery system


The City has already approved the FY 02/03 budget to include the cost of this retrofit project. These budget amounts were obtained from several vendors of pollution control technology tasked by the City to provide a Budgetary Proposal with not to exceed estimates.

The following is an estimated time line for milestones for this project.

1. Have compliance stack test 2001 (for Title V permit) as well as data testing for all emissions that are to be regulated under the new rule on or before October 31, 2001.
2. Have design build RFP for pollution control retrofit issued and advertised on or before March 31, 2002.
3. Award design-build RFP on or before September 30, 2002.
4. Apply for all necessary construction permits and permit modifications on or before December 30, 2002.
5. Start site construction on or before May 31, 2003.
6. Startup system and test on or before December 1, 2003.
7. Be in operational compliance on or before March 1, 2004.

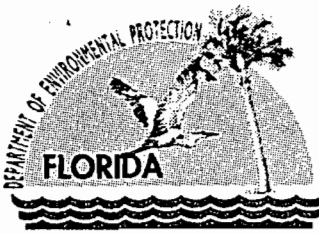
If you have any questions or need any further information, please contact my office.

Sincerely,

  
R.B. Havens  
Plant Manager  
Southernmost Waste-to-Energy Facility  
Ph: (305) 293-6409

cc: Venkata Panchakarla / FDEP Tallahassee  
Ronald Blackburn / FDEP Fort Meyers  
Jim Edds / FDEP Marathon

RH



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

January 21, 2003

CERTIFIED MAIL – Return Receipt Requested

Mr. E. David Fernandez  
Utility Director  
City of Key West  
Southernmost Waste-to-Energy Facility  
P. O. Box 1409  
Key West, Florida 33041-1409

Re: Section 111(d) Compliance Schedule Progress and Applicable Requirements  
**2<sup>nd</sup> Notice**

Dear Mr. Fernandez:

Please refer to the attached Compliance Schedule that applies to the municipal waste combustion units at your facility (ID. No. **0870047**). This Compliance Schedule is a requirement of Rule 62-204.800(8)(e), F.A.C. The first Increment of Progress scheduled event, "Submit Final Control Plan", was due on September 30, 2001. On August 29, 2002, a letter was sent to you requesting the "Final Control Plan"; and, on October 8, 2002, a letter was sent to you requesting a listing of the applicable requirements pertaining to 40 CFR 60, Subpart BBBB. Please provide us a copy of this Final Control Plan submission and applicable requirements as soon as possible.

In addition, your initial Title V Permit was issued/effective on December 31, 1999. On December 6, 2000, the regulations at 40 CFR Part 60, Subpart BBBB, Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or before August 30, 1999, became applicable to your facility. Since the additional applicable requirements became applicable to your facility and there is more than 3 (three) years left on your permit as of the effective date of the new regulations, the Department is required to open your Title V Permit for cause and install these requirements in accordance with Rules 62-4.080(1) and 62-213.430(4), F.A.C., and 40 CFR 70.7(f). In order to incorporate the specific applicable requirements of 40 CFR Part 60, Subparts A and BBBB, into your Title V Permit, please provide the specific rule cites of these applicable regulations for your facility and affected emissions units.

If there are any questions, please give Bruce Mitchell a call at 850/413-9198.

Sincerely,

Scott M. Sheplak, P.E.  
Program Administrator  
Title V Section

Attachment

"More Protection, Less Process"

Printed on recycled paper.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Mr. E. David Fernandez  
 Utility Director  
 City of Key West  
 Southernmost Waste-to-Energy Facility  
 P.O. Box 1409  
 Key West, Florida 33041-1409

2. Article Number  
 (Transfer from service label) 7000 2870 0000 7028 0696

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 *Kent Dish*  Agent  
 Addressee

B. Received by (Printed Name) *Kent Dish* C. Date of Delivery *6/24/03*

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

**U.S. Postal Service  
 CERTIFIED MAIL RECEIPT  
 (Domestic Mail Only; No Insurance Coverage Provided)**

7000 2870 0000 7028 0696

Mr. E. David Fernandez, Utility Director

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
 Here

Sent To  
 Mr. E. David Fernandez, Utility Director  
 Street, Apt. No.; or PO Box No.  
 P. O. Box 1409  
 City, State, ZIP+4  
 Key West, Florida 33041-1409

PS Form 3800, May 2000

See Reverse for Instructions

## Source Inventory

The two sources in Florida that are subject to 40 CFR 60, Subpart BBBB, are the following. Both sources have valid air operating permits. Each facility has two SMWC units.

1. Bay County Resource Recovery Facility, Panama City (Class I).
2. Southernmost Waste-to-Energy Facility, City of Key West (Class II).

## Compliance Schedules and Increments of Progress

All affected SMWCUs shall comply with all the requirements of Rule 62-204.800(8)(e), F.A.C., and achieve final compliance or cease operation as expeditiously as practicable but not later than the earlier of (1) December 6, 2005, or (2) three years after the effective date of State Plan approval by the EPA. The individual compliance schedules for meeting increments of progress and achieving final compliance, as outlined in each facility's final control plan, are given below.

Table 1. Increments of Progress

Increments of Progress	Source	
	Bay County	Southernmost
Submit Final Control Plan	09/30/01	09/30/01
Award Contracts	05/01/04	09/30/02
Begin Onsite Construction	06/01/04	05/31/03
Complete Onsite Construction	07/15/05	12/01/03
Achieve Final Compliance	11/15/05	03/01/04

## Emissions Limits and Inventory

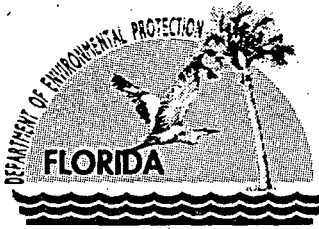
Table 2 is a summary list of the applicable emission limiting standards for all SMWCUs subject to 40 CFR 60, Subpart BBBB.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
PROPOSED SECTION 111(d) STATE PLAN**



**SMALL MUNICIPAL WASTE COMBUSTION UNITS  
November 29, 2001**

*Florida Department of Environmental Protection • Division of Air Resources Management  
2600 Blair Stone Road • MS 5500  
Tallahassee, Florida 32399-2400 • (850) 488-0114*



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

October 8, 2002

Mr. E. David Fernandez  
Utility Director  
City of Key West  
Southernmost Waste-to-Energy Facility  
P. O. Box 1409  
Key West, Florida 33041-1409

Re: Section 111(d) Compliance Schedule Progress and Applicable Requirements


Dear Mr. Fernandez:

Please refer to the attached Compliance Schedule that applies to the municipal waste combustion units at your facility (ID. No. **0870047**). This Compliance Schedule is a requirement of Rule 62-204.800(8)(e), F.A.C. The first Increment of Progress scheduled event, "Submit Final Control Plan", was due on September 30, 2001. On August 29, 2002, a letter was sent to you requesting the "Final Control Plan". Please provide us a copy of this Final Control Plan submission as soon as possible.

In addition, your initial Title V Permit was issued/effective on December 31, 1999. On December 6, 2000, the regulations at 40 CFR Part 60, Subpart BBBB, Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or before August 30, 1999, became applicable to your facility. Since the additional applicable requirements became applicable to your facility and there is more than 3 (three) years left on your permit as of the effective date of the new regulations, the Department is required to open your Title V Permit for cause and install these requirements in accordance with Rules 62-4.080(1) and 62-213.430(4), F.A.C., and 40 CFR 70.7(f). In order to incorporate the specific applicable requirements of 40 CFR Part 60, Subparts A and BBBB, into your Title V Permit, please provide the specific rule cites of these applicable regulations for your facility and affected emissions units.

If there are any questions, please give Bruce Mitchell a call at 850/413-9198.

Sincerely,

  
Scott M. Sheplak, P.E.  
Program Administrator  
Title V Section

Attachment

"More Protection, Less Process"

Printed on recycled paper.

## Source Inventory

The two sources in Florida that are subject to 40 CFR 60, Subpart BBBB, are the following. Both sources have valid air operating permits. Each facility has two SMWC units.

1. Bay County Resource Recovery Facility, Panama City (Class I).
2. Southernmost Waste-to-Energy Facility, City of Key West (Class II).

## Compliance Schedules and Increments of Progress

All affected SMWCUs shall comply with all the requirements of Rule 62-204.800(8)(e), F.A.C., and achieve final compliance or cease operation as expeditiously as practicable but not later than the earlier of (1) December 6, 2005, or (2) three years after the effective date of State Plan approval by the EPA. The individual compliance schedules for meeting increments of progress and achieving final compliance, as outlined in each facility's final control plan, are given below.

**Table 1. Increments of Progress**

Increments of Progress	Source	
	Bay County	Southernmost
Submit Final Control Plan	09/30/01	09/30/01
Award Contracts	05/01/04	09/30/02
Begin Onsite Construction	06/01/04	05/31/03
Complete Onsite Construction	07/15/05	12/01/03
Achieve Final Compliance	11/15/05	03/01/04

## Emissions Limits and Inventory

Table 2 is a summary list of the applicable emission limiting standards for all SMWCUs subject to 40 CFR 60, Subpart BBBB.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
PROPOSED SECTION 111(d) STATE PLAN**



**SMALL MUNICIPAL WASTE COMBUSTION UNITS  
November 29, 2001**

*Florida Department of Environmental Protection • Division of Air Resources Management  
2600 Blair Stone Road • MS 5500  
Tallahassee, Florida 32399-2400 • (850) 488-0114*





September 17, 2002

THE CITY OF KEY WEST

Mr. Scott M. Sheplak, P.E.  
Administrator  
Title V Section  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

P.O. BOX 1409  
KEY WEST, FL 33041-1409  
www.keywestcity.com

RECEIVED

SEP 30 2002

Re: Final Control Plan compliance schedule  
Southernmost Waste to Energy Facility  
Permit No. 0870047-001 AV

BUREAU OF AIR REGULATION

Dear Mr. Sheplak:

As per your letter dated August 29, 2002, please find attached the Final Control Plan for the Southernmost Waste to Energy Facility and a letter addressing Mr. Panchakarla's RAI. This plan was submitted to the FDEP on September 26, 2001.

Due to city capital budget freezes the first two quarters after the September 11 attack on the world trade center, and the unexpected amount of time it has taken to prepare proper RFP documents for contract award, the city would like to ask the department to accept this updated timeline to the Final Control Plan.

Submit Final Control Plan	<b>Completed</b>
Award Contracts	<b>July 31, 2003</b>
Begin Onsite Construction	<b>April 30, 2004</b>
Complete Onsite Construction	<b>May 31, 2005</b>
Achieve Final Compliance	<b>October 30, 2005</b>

Please contact my office if you have any questions or need any further information.

R.B. Havens

Plant Manager

Southernmost Waste-to-Energy Facility  
(305) 293-6409  
[rbhaven@keywestcity.com](mailto:rbhaven@keywestcity.com)

cc: Venkata Panchakarla, FDEP Tallahassee  
Ronald Blackburn, FDEP Fort Meyers  
Jim Edds, FDEP Marathon  
File

cc: Larry Geage, OPAPM 1/7/03



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

August 29, 2002

Mr. E. David Fernandez  
Utility Director  
City of Key West  
Southernmost Waste-to-Energy Facility  
P. O. Box 1409  
Key West, Florida 33041-1409

Re: Section 111(d) Compliance Schedule Progress

Dear Mr. Fernandez:

Please refer to the attached Compliance Schedule that applies to the municipal waste combustion units at your facility (ID. No. **0870047**). This Compliance Schedule is a requirement of Rule 62-204.800(8)(e), F.A.C. The first Increment of Progress scheduled event, Submit Final Control Plan, was due on September 30, 2001. Please provide us a copy of this Final Control Plan submission as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott M. Sheplak".

*for* Scott M. Sheplak, P.E.  
Administrator  
Title V Section

Attachment

## Source Inventory

The two sources in Florida that are subject to 40 CFR 60, Subpart BBBB, are the following. Both sources have valid air operating permits. Each facility has two SMWC units.

1. Bay County Resource Recovery Facility, Panama City (Class I).
2. Southernmost Waste-to-Energy Facility, City of Key West (Class II).

## Compliance Schedules and Increments of Progress

All affected SMWCUs shall comply with all the requirements of Rule 62-204.800(8)(e), F.A.C., and achieve final compliance or cease operation as expeditiously as practicable but not later than the earlier of (1) December 6, 2005, or (2) three years after the effective date of State Plan approval by the EPA. The individual compliance schedules for meeting increments of progress and achieving final compliance, as outlined in each facility's final control plan, are given below.

**Table 1. Increments of Progress**

Increments of Progress	Source	
	Bay County	Southernmost
Submit Final Control Plan	09/30/01	09/30/01
Award Contracts	05/01/04	09/30/02
Begin Onsite Construction	06/01/04	05/31/03
Complete Onsite Construction	07/15/05	12/01/03
Achieve Final Compliance	11/15/05	03/01/04

## Emissions Limits and Inventory

Table 2 is a summary list of the applicable emission limiting standards for all SMWCUs subject to 40 CFR 60, Subpart BBBB.

**STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
PROPOSED SECTION 111(d) STATE PLAN**



**SMALL MUNICIPAL WASTE COMBUSTION UNITS  
November 29, 2001**

*Florida Department of Environmental Protection • Division of Air Resources Management  
2600 Blair Stone Road • MS 5500  
Tallahassee, Florida 32399-2400 • (850) 488-0114*



**FILE COPY**

October 17, 2001

**THE CITY OF KEY WEST**

P. O. BOX 1409  
KEY WEST, FLORIDA 33041-1409  
www.keywestcity.com

Mr. Venkata Panchakarla  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Final Control Plan  
Monroe Co. – AP  
Southernmost Waste to Energy Facility  
Permit No. 0870047-001 AV

Mr. Venkata Panchakarla:

As per our phone conversation on October 15, 2001 here is the additional information you requested.

Please note that the 1996 stack test information is in a table form averaging 5 runs on the two units. I have indicated on the table where more recent information was available.

As I mentioned in our phone conversation the City will be performing another stack test for current information to use for the retrofit RFP around the end of November, as well as our annual Title V compliance test.

If you have any questions or need any further information, please contact my office.

Sincerely,

A handwritten signature in black ink, appearing to read "R.B. Havens", with a long horizontal line extending to the right.

R.B. Havens  
Plant Manager  
Southernmost Waste-to-Energy Facility  
Ph: (305) 293-6409

cc: Ronald Blackburn / FDEP Fort Meyers  
Jim Edds / FDEP Marathon

RH

Attachments: (3) Supplement 2, July 1996 Stack Test Results  
Table 4 and 5 of Subpart BBBB

COM 2002 BAB

**SUPPLEMENT 2**

**Southernmost Waste-to-Energy Facility (SWEF)**

**Stack Testing Results - July 1996**

Unit:	#1	#1	#1	#2	#2	
Fuel:	Dry	Dry	Wet	Dry	Dry	
Capacity:	100%	50%	100%	100%	75%	
Date:	8/15/96	8/16/96	8/17/96	8/18/96	8/19/96	
Pollutant	Emission Rate (lbs/hr)	Emission Rate (lbs/hr)	Emission Rate (lbs/hr)	Emission Rate (lbs/hr)	Emission Rate (lbs/hr)	Average (lbs/hr)
TSP	0.608	0.443	0.596	0.838	2.537	1.004
PM(10)-Front	1.535	X	1.075	0.982	X	1.197
PM(10)-Back	2.438	X	2.383	2.625	X	2.482
PM(10)-Both	3.973	X	3.458	3.607	X	3.679
Cd	4.14E-04	3.61E-04	7.71E-04	1.89E-03	X	8.59E-04
Pb	3.96E-03	4.47E-03	1.02E-02	1.62E-02	X	8.71E-03
Hg	6.59E-04	7.31E-04	6.35E-04	9.70E-04	X	7.49E-04
HCl	19.77	7.870	17.227	16.930	18.627	16.085
CO	88.706	27.404	63.233	104.362	51.313	67.004
NO <sub>x</sub>	6.988	9.898	11.607	10.317	10.043	9.771
SO <sub>2</sub>	7.824	6.406	6.522	6.150	3.428	6.066
O <sub>2</sub> (%)	10.913	15.775	14.083	13.417	13.377	13.513
CO <sub>2</sub> (%)	8.863	4.480	6.067	6.713	6.820	6.589
H <sub>2</sub> O (%)	13.34	9.19	12.34	12.23	12.03	11.83
Opacity (%)	5.16	0.54	5.06	6.81	5.22	4.56
Grains/dscf**	0.0062	0.0023	0.0036	0.0047	0.0141	0.0062
TSP Collection Eff. %	94.91%	98.83%	99.35%	98.51%	97.28%	97.78%
Flow Rate (dscfm)**	9796	9227	10811	12763	12880	11095
Stack Temp (F)	495.8	476.4	489.8	519.6	526.7	501.7
* Each unit is rated at 75 tpd. Total plant capacity is 150 tpd. A unit consists of a MWC and an ESP. Both units vent to a common stack.						
** Corrected to 7% O <sub>2</sub>						

**Table 4 of Subpart BBBB – Model Rule -- Class II Emission Limits for Existing Small Municipal Waste Combustion Unit**

a\

For the Following Pollutants	You must meet the following emission following determine limits b\	Using the following averaging times	And determine compliance by the following methods	Most Recent Data
1. Organics: Dioxins/Furans (total mass basis)	125 nanograms per dry standard cubic meter	3-run average (minimum run duration is 4 hours).	Stack Test	CO2 (%) 6.589 lbs/hr (1996 stack test)
2. Metals: Cadmium	0.10 milligrams per dry standard cubic meter	3-run average (run duration specified in test method).	Stack Test	8.59E-04 lbs/hr (1996 stack test) .02066976 mg/dscm
Lead	1.6 milligrams per dry standard cubic meter	3-run average (run duration specified in test method).	Stack Test	8.71E-03 lbs/hr (1996 stack test) .20958516 mg/dscm
Mercury	.080 milligrams per dry standard cubic meter. 85 percent reduction of potential mercury emissions.	3-run average (run duration specified in test method).	Stack Test	45.85 gr/SCM Unit one 19.29 gr/SCM Unit two (2000 stack test) .04585000 mg/dscm (1) .01929000 mg/dscm (2)
Opacity	10 percent	Thirty 6-minute average	Stack Test	0.0% (2000 stack test)
Particulate Matter	70 milligrams per dry standard cubic meter.	3-run average (run duration specified in test method).	Stack Test	2.987 lbs/hr Unit one 2.473 lbs/hr Unit two (2000 stack test) 122.3902331 mg/dscm (1) 118.4731476 mg/dscm
3. Acid Gases: Hydrogen Chloride	250 parts per million by volume -or-  50 percent reduction of potential hydrogen chloride emissions.	3-run average (minimum run duration is 1 hour).	Stack Test	16.085 lbs/hr (1996 stack test) 256.00624 ppmvd
Sulfur Dioxide	77 parts per million by dry volume -or- 50 percent reduction of potential sulfur dioxides	24-hour daily block geometric average concentration -or- percent reduction	Continuous emission monitoring system	6.066 lbs/hr (1996 stack test) 54.94066 ppmvd

	emissions.			
4. Other: Fugitive Ash	Visible emissions for no more than 5 percent of hourly observation period.	Three 1-hour observation periods.	Visible emission test.	Pass (staff performed)

- a. Class I units mean all small municipal combustion units subject to this subpart that are located at municipal waste combustion plants with aggregate plant combustion capacity less than or equal to 250 tons per day of municipal solid waste. See Sec. 60.1940 for definitions.
- b. All emission limits (except for opacity) are measured at 7 percent oxygen.
- c. No monitoring, testing, recordkeeping or reporting is required to demonstrate compliance with the nitrogen oxides limit for Class II units.

**Table 5 of Subpart BBBB – Model Rule – Carbon Monoxide Emission Limits for Existing Small Municipal Waste Combustion Units**

<b>For the Following Municipal waste combustion units</b>	<b>You must meet the following carbon monoxide limits \a\</b>	<b>Using the following averaging times \b\</b>	<b>And determine compliance by the following methods</b>	<b>Most Recent Data</b>
5. Mass burn rotary waterwall and refractory.	100 parts per million by dry volume	4-hour.		67.004 lbs/hr (1996 stack test) 1388.14161 ppmvd

\a\ All emission limits (except for opacity) are measured at 7 percent oxygen. Compliance is determined by continuous emission monitoring systems.

\b\ Block averages, arithmetic mean. See Sec. Y0.1940 for definitions.

\c\ 24-hour block average, geometric mean.





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September 26, 2001

THE CITY OF KEY WEST

P. O. BOX 1409  
KEY WEST, FLORIDA 33041-1409  
www.keywestcity.com

Lawrence A. George  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Final Control Plan  
Monroe Co. – AP  
Southernmost Waste to Energy Facility  
Permit No. 0870047-001 AV

Mr. Lawrence George:

As per your letter dated June 21, 2001 this letter will serve as the City of Key West (City) Final Control Plan for the Southernmost Waste to Energy Facility located at 5701 College Road, Stock Island; Latitude 24\*34'42"N / Longitude 81\*44'49"W.

The City plans to comply with the Emission Guidelines for Small Municipal Waste Combustion Units (40 CFR 60 BBBB) on or before March 1, 2004.

This Final Control Plan will require a permit modification and a retrofit construction project of the existing pollution control equipment.

The City has already done extensive research into pollution control technologies and has been budgeting monies for retrofit design since 1997 in anticipation of adoption of new rules.

The City has chosen to eliminate the current pollution control technology (Electro Static Precipitators) and replace them with a dry hydrated lime and carbon flue gas scrubber system.

This system will include:

Evaporative Cooler Tower: This will be used to lower the flue gas temperature to make the hydrated lime more effective.

Hydrated Lime and Carbon Injection System. This will introduce the lime and carbon into the flue stream.

Pulse Jet Fabric Filter (Bag House). This will function as a particle collector and acid gas removal system.

Induced Draft Fan. It will be necessary to increase the size of the ID fans to allow for increased pressure drop caused by the bag house.

D1  
Retrofit

0870047-001

Water Pumps. The pumps are to be variable speed, positive displacement type, to deliver water to the Evaporative Cooler Tower.

The system will have two of each of the above-mentioned devices (two trains) sharing one common stack (existing).

In addition to the above, the following sub-systems are required for each pollution control system.

- Structural Supports and Platforms
- Instrumentation and Controls
- Expansion Joints and Ductwork
- Compressor
- End Product Handling System (existing)
- One (1) common lime storage and delivery system
- One (1) common activated carbon storage and delivery system

The City has already approved the FY 02/03 budget to include the cost of this retrofit project. These budget amounts were obtained from several vendors of pollution control technology tasked by the City to provide a Budgetary Proposal with not to exceed estimates.

The following is an estimated time line for milestones for this project.

1. Have compliance stack test 2001 (for Title V permit) as well as data testing for all emissions that are to be regulated under the new rule on or before October 31, 2001.
2. Have design build RFP for pollution control retrofit issued and advertised on or before March 31, 2002.
3. Award design-build RFP on or before September 30, 2002.
4. Apply for all necessary construction permits and permit modifications on or before December 30, 2002.
5. Start site construction on or before May 31, 2003.
6. Startup system and test on or before December 1, 2003.
7. Be in operational compliance on or before March 1, 2004.

If you have any questions or need any further information, please contact my office.

Sincerely,



R.B. Havens  
Plant Manager  
Southernmost Waste-to-Energy Facility  
Ph: (305) 293-6409

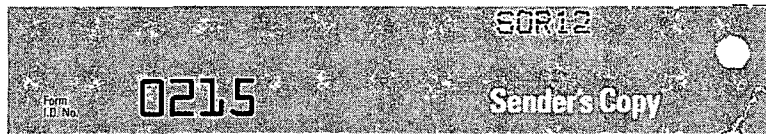
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5 Packaging FedEx Envelope. FedEx Pak. Other.

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