

Sheplak, Scott

From: Sheplak, Scott
Sent: Tuesday, April 03, 2001 2:09 PM
To: 'William Corbin'
Cc: rlarson@hdrinc.com; elias@rtpenv.com; sreinhart@wm.com
Subject: FINAL Permit No.: 1030117-002-AV

Re: FINAL Permit No.: 1030117-002-AV
Pinellas County Resource Recovery Facility

This message is in response to your e-mail dated March 26, 2001. In your message you had questions on testing frequency.

Unit 3 has a fluoride limit of 8.31 pounds/hour {see permit condition B.34.}. Florida Rule 62-297.310(7), F.A.C. requires that compliance be demonstrated upon renewal for pollutants that are not major {see permit condition B.62.(a)3.}. To satisfy this requirement a stack test must be performed prior to renewal of the permit. The permit expires 10/22/05. I recommend that the testing be completed prior to April 25, 2005 so that the results can be reported in the renewal application. As we discussed if you feel, that the fluoride emission limit is not appropriate you may submit a request to have the limit removed under the PSD permit modification process.

Emissions units "-005 Metal Recovery System" and "-008 Ash Conditioning Building" both have particulate matter emission limits. Rule 62-297.620(4), F.A.C. waives PM testing from minor sources equipped with baghouses. Since these sources do not have baghouses they do not qualify for the waiver. If the facility wishes to change this testing requirement, you may be able to do so under an alternate sampling procedure (ASP) under Rule 62-297, F.A.C.

Tables 1-1 and 2-1 summarize the air pollutant standards and testing requirements.

If you should have any further questions, please do not hesitate to contact me.

-----Original Message-----

From: William Corbin [mailto:corbin@rtpenv.com]
Sent: Monday, March 26, 2001 11:52 AM
To: Sheplak, Scott
Cc: rlarson@hdrinc.com; elias@rtpenv.com; sreinhart@wm.com
Subject: Pinellas County RRF Stack Tests

Scott Sheplak, FDEP Title V

In accordance with our telephone conversation on March 22, 2001, I am sending you this email message for written confirmation of the items we discussed. The initial Title V permit for the Pinellas County Resource Recovery Facility (PCRRF) requires some additional testing requirements that were not contained in previous construction permits. Specifically, fluoride tests are required for Unit 3 every five years and Method 5 particulate tests are required for the two wet scrubbers every five years.

Pinellas County respectfully requests that you confirm these particular stack tests required every five years should be performed in 2004 or 2005 prior to renewal of the Title V permit (presently, stack tests are performed in May and the test reports become available in June-July while the Title V renewal due date is April 25, 2005 and permit expires on October 22, 2005).

If you have any questions, please call me or Donald Elias at 732/968-9600.

Sincerely,
Bill Corbin
RTP Environmental Associates