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December 13, 2010

Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Title V Air Permitting Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399

Subject: Request for Information No. 2, File No. 1030117-008-AV
Pinellas County Resource Recovery Facility
Facility ID 1030117

Dear Mr. Sheplak:

On behalf of the Pinellas County Department of Solid Waste Operations, CDM has reviewed the Request for Information (RAI) correspondence, dated September 20, 2010 and has prepared responses in accordance with Rule 62-4.055(1) F.A.C. A summary of the responses is provided below.

A. Requested Additional Information Items dated May 24, 2010

1. Renewal Compliance Testing: Thank you for the responses on the renewal compliance test results for the Municipal Waste Combustor (MWC) Units 1-3.
 - a. In the response, a "maximum permitted steam flow" of "244,000 lbs/hour" was mentioned on the top of page 2. Review of Permit No. 1030117-007-AC and Permit No. 1030117-006-AV specific condition no. B.9. indicates a maximum steam production of "275,000 lbs./hour (4-hour average)." Where does the "maximum permitted steam flow" of "244,000 lbs./hour" value come from?

CDM Response

In our response to RAI No. 1 (dated August 24, 2010), the use of a "maximum permitted steam flow of 244,000 lbs per hour" was an incorrect statement. The maximum steam flow is 275,000 lbs per hour as stated in the current permit.





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- b. In the table on page 2, a “steam flow” of “approximately 241,000 lbs/hour” was shown from the compliance tests for MWC Units 1-3. Is the “241,000 lbs/hour” value for each individual MWC unit? Please provide the individual MWC unit steam production values along with their averaging times.

CDM Response

The steam flow of “241,000 lbs per hour” represents the highest, 4-hour average steam flow recorded during all test runs for MWC Units Nos. 1, 2, and 3. In accordance with 40 CFR 60, Subpart Cb, the maximum unit load is based upon 110% of the unit load established during the most recent EPA Method 23 compliance testing. The individual MWC unit steam production values for all test runs during the April 2010 compliance testing, with associated averaging times, are shown in the table below.

Unit No.	Run No.	Run Date	Run Time	Steam Flow (4 hour Average) (Klbs/hr)
Unit 1	U1O-M26A-R1	4/21/2010	0956-1125	231
	U1O-M26A-R2	4/21/2010	1353-1453	232
	U1O-M26A-R3	4/21/2010	1634-1734	231
	U1O-M29-R1	4/21/2010	0954-1247	231
	U1O-M29-R2	4/21/2010	1350-1601	232
	U1O-M29-R3	4/21/2010	1632-1844	233
	U1O-M13B-R1	4/22/2010	1547-1652	235
	U1O-M13B-R2	4/22/2010	1703-1808	239
	U1O-M13B-R3	4/23/2010	0743-0848	231





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Unit No.	Run No.	Run Date	Run Time	Steam Flow (4 hour Average) (Klbs/hr)
Unit 2	U2O-M26A-R1	4/22/2010	1333-1443	235
	U2O-M26A-R2	4/22/2010	1631-1731	231
	U2O-M26A-R3	4/22/2010	0819-0919	237
	U2O-M29-R1	4/22/2010	1331-1600	235
	U2O-M29-R2	4/22/2010	1629-1837	232
	U2O-M29-R3	4/23/2010	0817-1029	235
	U2O-M13B-R1	4/21/2010	1200-1305	239
	U2O-M13B-R2	4/21/2010	1316-1421	240
	U2O-M13B-R3	4/21/2010	1432-1537	237
	U2O-M23-R1	4/20/2010	0902-1334	233
	U2O-M23-R2	4/20/2010	1357-1803	230
	U2O-M23-R3	4/21/2010	0720-1128	241
Unit 3	U3O-M26A-R1	4/20/2010	0909-1009	239
	U3O-M26A-R2	4/20/2010	1216-1316	237
	U3O-M26A-R3	4/22/2010	1013-1113	238
	U3O-M29-R1	4/20/2010	0902-1120	238





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Unit No.	Run No.	Run Date	Run Time	Steam Flow (4 hour Average) (Klbs/hr)
	U ₃ O-M ₂₉ -R ₂	4/20/2010	1212-1427	237
	U ₃ O-M ₂₉ -R ₃	4/22/2010	0945-1225	234
	U ₃ O-M ₁₃ B-R ₁	4/20/2010	1626-1731	236
	U ₃ O-M ₁₃ B-R ₂	4/22/2010	1300-1405	236
	U ₃ O-M ₁₃ B-R ₃	4/22/2010	1418-1523	237

Please explain the apparent conflicts between the reported maximum values (“244,000 lbs./hour” and “275,000 lbs/hour”) and the test result value “241,000 lbs/hour”).

CDM Response

As previously mentioned, the maximum steam flow is 275,000 lbs per hour. The 241,000 lbs per hour represents the highest, 4-hour average steam flow recorded during all test runs of the most recent compliance testing for MWC Units Nos. 1, 2, and 3. In accordance with the 40 CFR 60, Subpart Cb, the maximum unit load is based upon 110% of the unit load established during the most recent EPA Method 23 compliance testing.

What were the averaging periods for the reported steam values?

CDM Response

The averaging periods and associated steam flows for each test run during the April 2010 compliance testing for MWC Units Nos. 1, 2, and 3 are shown in the table above.





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- c. Renewal compliance testing is also required for the following additional emissions units:

E.U. ID	Brief Description
-004	Hydrated Lime Storage Silo
-005	Metals Recovery System
-006	Activated Carbon Storage Silo
-007	Lime Storage Silo
-008	Ash Conditioning Building

Please provide an executive summary of the test results for these emissions units.

CDM Response

A summary of the visible emissions results for E.U. ID Nos. -004, -006, -007 and -008 is provided in the table below. Based on the correspondence dated, August 3, 2010, the County and Department mutually agreed the baghouse in the E.U. ID -005, Residue Storage and Processing Building (RSPB), which was formerly referenced as the "Metals Recovery System," was installed to meet the mechanical ventilation requirements of the RSPB and should be exempt from the emission testing requirements pursuant to Rule 62-4.040, F.A.C. Therefore, this baghouse is not an emission source and the existing air permit should be modified to remove this emission unit (E.U. ID-005). However, the RSPB will be subject to the fugitive emission requirements pursuant to Condition B.31.





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E.U. ID	Brief Description	Date	Opacity (%)
-004	Hydrated Lime Storage Silo for Lime Softening	6/25/2010	0.00%
-006	Activated Carbon Storage Silo	6/25/2010	0.08%
-007	Lime Storage Silo for SDA	4/22/2010	0.00%
-008	Ash Conditioning Building (ACB)	4/22/2010	0.00%

2. New Applicable Requirements - Federal Regulation Amendments, Municipal Waste Combustors (MWC) 40 Code of Federal Regulations (CFR) 60, Subpart Cb: Thank you for the responses.

CDM Response

No additional response necessary.

3. Capital Replacement Project and Facility Improvement Projects: Thank you for describing these two projects.
- a. In the response it was indicated that dioxin/furan testing is scheduled for September 21, 2010. Please provide an executive summary of the dioxin/furan test results when complete.

CDM Response

A summary of the dioxin/furan testing results are shown in the table below. Due to concerns regarding testing methodology expressed by the Department during the first test run, four test runs were completed. Results show the average of the first three runs, second through fourth runs, and all four runs. The unit is compliant for all three scenarios.





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Parameter	Unit	Title V Limit	MWC Unit 1 (Sep 2010)	Pass/Fail
Dioxins/Furans	ng/dscm@7%O ₂	30	1.66	Pass
Dioxins/Furans	ng/dscm@7%O ₂	30	1.15	Pass
Dioxins/Furans	ng/dscm@7%O ₂	30	8.39	Pass
Dioxins/Furans	ng/dscm@7%O ₂	30	8.73	Pass
Average Test Runs 1 - 3			3.73	Pass
Average Test Runs 2 - 4			6.09	Pass
Average Test Runs 1 - 4			4.98	Pass

4. New Applicable Requirements - Engines:

- a. New Applicable Requirements - New Source Performance Standards (NSPS) Requirements from 40 CFR 60 also known as (a.k.a.) NSPS "4-I's" or "CI-ICE."
- b. New Applicable Requirements - National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements also known as (a.k.a) Maximum Available Control Technologies (MACT) from 40 CFR 63 Subpart ZZZZ a.k.a. MACT "4-Z's" or "RICE MACT"

The responses look good. Thank you for providing the engine descriptions and specific rule applicability. This should help with the inclusion of the engines into the Title V air operation permit renewal this cycle.

CDM Response

No additional response is necessary.





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5. Risk Management Plan (RMP): Thank you for the update.

CDM Response

No additional response is necessary.

6. Ambient Air Monitors: Thank you for the detailed answer on this item.

CDM Response

No additional response is necessary.

7. Cooling Towers: Thank you for the response.

CDM Response

No additional response is necessary.

B. Title V Air Operation Permit Revision Request to include Permit No. 1030117-007-AC

On July 1, 2010, the Department received a "Construction Completion/Air Compliance Report" dated June 30, 2010 for Permit No. 1030117-007-AC/PSD-FL-011C & PSD-FL-098C. In this letter/report, it was requested that the construction monitoring, e.g., PSD-avoidance requirements and any other resulting changes from Permit No. 1030117-007-AC to be incorporated into the Title V air operation permit renewal project.

1. Thank you for certifying the submission by a P.E. The Department also requires a responsible official (R.O.) certification for this specific request. The P.E. and R.O. certification statements from DEP Form No. 62-210.900(1) should be used. Please submit completed P.E. and R.O. certification statements for this specific request.

CDM Response

As requested, the responsible official and professional engineer certification statements are included on DEP Form No. 62-210.900(1).



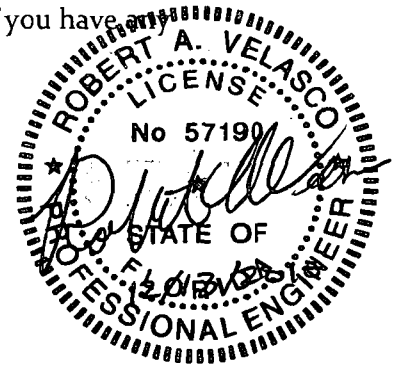


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It is requested that the department approve the Title V permit application based on the addition information provided herein. Please contact me (813) 281-2900, if you have any questions.

Sincerely,

William Crellin Jr., P.E.
Project Manager
Camp Dresser & McKee Inc.



cc: FDEP
Kelsi Oswald - Pinellas County
Becky Macionski, P.E. - Veolia ES (no attachments)
Dan Strobridge QEP - CDM (no attachments)
Robert Velasco P.E., BCEE - CDM
File

Robert A. Velasco, P.E., BCEE
License No. 57190
Camp, Dresser McKee, Inc.
1715 N. West shore Blvd, Suite 875
Tampa, FL 33607
Tel: (813) 262-8868
Cert. of Auth. #EB 0000020

The seal certifies the engineering information included herein provides reasonable assurance of meeting the applicable requirements of the Title V air permit renewal application. The seal does not certify or attest to the accuracy of work prepared by others who are qualified to perform the work.

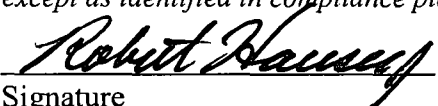
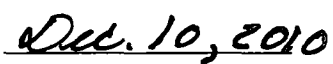


**Construction Completion/Air Compliance Report,
Responsible Official and PE Certification Statements**

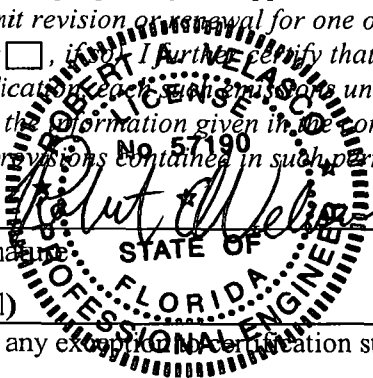
DEP Form No. 62-210.900(1)

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Robert Hauser P.E.
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Pinellas County Department of Solid Waste Management Street Address: 3095 114 th Avenue North City: St. Petersburg State: Florida Zip Code: 33716
4. Application Responsible Official Telephone Numbers... Telephone: (727) 464 - 7500 ext. Fax: () -
5. Application Responsible Official E-mail Address: rhauser@pinellascounty.org
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

Professional Engineer Certification

1. Professional Engineer Name: Robert A. Velasco P.E., BCEE Registration Number: 57190
2. Professional Engineer Mailing Address... Organization/Firm: CDM Street Address: 1715 N. Westshore Boulevard, Suite 875 City: Tampa State: Florida Zip Code: 33607
3. Professional Engineer Telephone Numbers... Telephone: (813) 262 - 8868 ext. Fax: (813) 288 - 8787
4. Professional Engineer E-mail Address: <u>velascora@cdm.com</u>
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> _____ Signature: <i>Robert A. Velasco</i> Date: <u>12/10/2010</u> (seal) 

* Attach any exceptions to the certification statement and contact information of seal.

Exceptions to PE Certification Statement

The seal certifies the engineering information included "Construction Completion/Air Compliance Report" dated June 30, 2010 for Permit No. 1030117-007-AC provides reasonable assurance of meeting the applicable requirements of the Title V permit. The seal does not certify or attest to the accuracy of work prepared by others who are qualified to perform the work. The information provided herein is believed to be correct to the best of the engineer's knowledge.

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