



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

September 20, 2010

Sent via Electronic Mail - Read Receipt Requested

rhauser@pinellascounty.org

Mr. Robert Hauser
Director
Department of Solid Waste Management
Pinellas County
3095 114th Avenue North
St. Petersburg, Florida 33716

Re: Additional Information, File Number 1030117-008-AV
Title V Air Operation Permit Renewal Application
Pinellas County Resource Recovery Facility

Dear Mr. Hauser:

On August 24, 2010, the Department received a response to the request for additional information. This Title V air operation permit renewal application is for the subject facility and was received via Electronic Permit Submittal and Processing System (EPSAP). The Pinellas County Resource Recovery Facility is located at 3001 110th Avenue North, St. Petersburg in Pinellas 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. 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?
- 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.

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").

What were the averaging periods for the reported steam values?

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

E.U. ID No.	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.

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.
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.
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.

5. Risk Management Plan (RMP): Thank you for the update.
6. Ambient Air Monitors: Thank you for the detailed answer on this item.
7. Cooling Towers: Thank you for the response.

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.

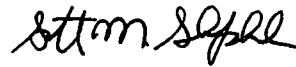
1. Thank you for certifying the submission by a P.E. The Department also requires a responsible official (R.O.) certification for this specific request. The P.E. and R.O. certification statements from DEP Form No. 62-210.900(1) should be used. Please submit completed P.E. and R.O. certification statements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

The Department will resume processing the application 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 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 application, 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 850/921-9532 or by e-mail at scott.sheplak@dep.state.fl.us.

Sincerely,



Scott M. Sheplak, P.E.
DEP - Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399

copy to: Ms. Kelsi Oswald, Pinellas County Solid Waste: koswald@co.pinellas.fl.us
Ms. Rebecca Macionski, Veolia: rebecca.macionski@veoliaes.com
Mr. Robert A. Velasco, P.E., CDM: velascora@cdm.com
Mr. Mike Halpin, P.E., DEP Siting: michael.halpin@dep.state.fl.us
Mr. Peter Hessling, PCDEM AQD: phesslin@co.pinellas.fl.us
Ms. Cindy Zhang-Torres, P.E., DEP SWD: zhang-torres@dep.state.fl.us
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

Friday, Barbara

To: rhauser@pinellascounty.org
Cc: koswald@co.pinellas.fl.us; rebecca.macionski@veoliaes.com; velascora@cdm.com; Halpin, Mike; phesslin@co.pinellas.fl.us; Zhang-Torres; Gibson, Victoria; Sheplak, Scott
Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility
Attachments: RobertHauserSeptember 20PinellasCountyRRF1030117-008-AVAdditionalInformation.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

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Thank you,

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

Friday, Barbara

From: Microsoft Exchange
To: rhauser@pinellascounty.org
Sent: Monday, September 20, 2010 2:02 PM
Subject: Relayed: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

rhauser@pinellascounty.org

Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Hauser, Robert [rhauser@co.pinellas.fl.us]
To: Friday, Barbara
Sent: Tuesday, September 21, 2010 6:28 AM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Tuesday, September 21, 2010 6:28:27 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Hauser, Robert [rhauser@co.pinellas.fl.us]
Sent: Tuesday, September 21, 2010 6:31 AM
To: Friday, Barbara
Subject: RE: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

I received the document and I am able to view the document.

Thank you

Robert Hauser Jr., Director
Pinellas County Utilities – Solid Waste Operations

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, September 20, 2010 2:02 PM
To: Hauser, Robert
Cc: Oswald, Kelsi; rebecca.macionski@veoliaes.com; velascora@cdm.com; Halpin, Mike; Hessling, Peter A; Zhang-Torres; Gibson, Victoria; Sheplak, Scott
Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

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Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Microsoft Exchange
To: koswald@co.pinellas.fl.us; phesslin@co.pinellas.fl.us
Sent: Monday, September 20, 2010 2:02 PM
Subject: Relayed: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

koswald@co.pinellas.fl.us

phesslin@co.pinellas.fl.us

Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Oswald, Kelsi [koswald@co.pinellas.fl.us]
To: Friday, Barbara
Sent: Monday, September 20, 2010 2:28 PM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Monday, September 20, 2010 2:27:43 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Oswald, Kelsi [koswald@co.pinellas.fl.us]
Sent: Monday, September 20, 2010 2:56 PM
To: Friday, Barbara
Subject: RE: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Pinellas County received the above referenced email and attached file.

Kelsi Jo Oswald
Waste to Energy Program Manager
Pinellas County Utilities, Solid Waste
3095 114th Avenue N.
St. Petersburg, FL 33716
(727)464-7514

All mail sent to and from Pinellas County is subject to the Public Records Laws of Florida.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, September 20, 2010 2:02 PM
To: Hauser, Robert
Cc: Oswald, Kelsi; rebecca.macionski@veoliaes.com; velascora@cdm.com; Halpin, Mike; Hessling, Peter A; Zhang-Torres; Gibson, Victoria; Sheplak, Scott
Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

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Thank you,

Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

Friday, Barbara

From: Hessling, Peter A [phesslin@co.pinellas.fl.us]
To: Friday, Barbara
Sent: Monday, September 20, 2010 2:03 PM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Monday, September 20, 2010 2:02:52 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Hessling, Peter A [phesslin@co.pinellas.fl.us]
Sent: Monday, September 20, 2010 2:09 PM
To: Friday, Barbara
Subject: RE: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Thank you; we have received the document and can open/view it.

Peter Hessling
Air Quality Division
727-464-4422

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, September 20, 2010 2:02 PM
To: Hauser, Robert
Cc: Oswald, Kelsi; rebecca.macionski@veoliaes.com; velascora@cdm.com; Halpin, Mike; Hessling, Peter A; Zhang-Torres; Gibson, Victoria; Sheplak, Scott
Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

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Barbara Friday
Bureau of Air Regulation
Division of Air Resource Management (DARM)
(850)921-9524

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Friday, Barbara

From: Microsoft Exchange
To: rebecca.macionski@veoliaes.com
Sent: Monday, September 20, 2010 2:03 PM
Subject: Relayed: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

rebecca.macionski@veoliaes.com

Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Microsoft Exchange
To: velascora@cdm.com
Sent: Monday, September 20, 2010 2:03 PM
Subject: Relayed: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

velascora@cdm.com

Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Velasco, Robert [VelascoRA@cdm.com]
Sent: Monday, September 20, 2010 10:31 PM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Monday, September 20, 2010 10:31:24 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Zhang-Torres; Halpin, Mike; Gibson, Victoria
Sent: Monday, September 20, 2010 2:02 PM
Subject: Delivered: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Your message has been delivered to the following recipients:

Zhang-Torres

Halpin, Mike

Gibson, Victoria

Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Zhang-Torres
To: Friday, Barbara
Sent: Monday, September 20, 2010 2:07 PM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Monday, September 20, 2010 2:06:33 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Halpin, Mike
To: Friday, Barbara
Sent: Monday, September 20, 2010 2:05 PM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Monday, September 20, 2010 2:05:14 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Monday, September 20, 2010 2:14 PM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Monday, September 20, 2010 2:13:39 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Sheplak, Scott
Sent: Monday, September 20, 2010 2:02 PM
Subject: Delivered: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Your message has been delivered to the following recipients:

Sheplak, Scott

Subject: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit Renewal Application - Pinellas County Resource Recovery Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Sheplak, Scott
To: Friday, Barbara
Sent: Monday, September 20, 2010 2:10 PM
Subject: Read: Additional Information, File Number 1030117-008-AV-Title V Air Operation Permit
Renewal Application - Pinellas County Resource Recovery Facility

Your message was read on Monday, September 20, 2010 2:09:54 PM (GMT-05:00) Eastern Time (US & Canada).