



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

December 20, 2010

Sent via Electronic Mail - Read Receipt Requested
steve.daignault@tampagov.net

Mr. Steve W. Daignault, Public Works and Utilities Services
City of Tampa
306 East Jackson Street
Tampa, Florida 33602

Re: Request for Additional Information, File Number 0570127-006-AV
Title V Air Operation Permit Renewal Application
McKay Bay Refuse to Energy Facility

Dear Mr. Daignault:

On October 28, 2010, the Department received a Title V air operation permit renewal application for the McKay Bay Refuse to Energy Facility, which is located in Hillsborough County at 107 North 34th Street, Tampa, 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.

1. **Previously Submitted Information.** All renewal applications are required to be treated the same as an initial application for purposes of identifying and certifying compliance with all applicable requirements. For renewal applications, it is not acceptable to reference previously submitted information. To be a complete application, all information must be reviewed, updated, submitted and certified as to its accuracy. The following information is a sample of missing information from this renewal application that must be submitted. You should thoroughly review the application to ensure that all of the information necessary to validate the Professional Engineer's and the Responsible Official's certifications is included.
 - a. Section 1 of 8, Page 26, Box 3: Detailed description of control equipment.
 - b. Section 1 of 8, Page 27, Box 2: Compliance Assurance Monitoring Plan. (see item 2)
 - c. Section 1 of 8, Page 27, Box 3: Alternative Methods of Operation (if applicable). In order to be able to switch between different methods of operation available for operating emissions without first notifying the permitting authority, those available methods must be listed in the permit. Provide a listing and description of all desired/implemented methods of operation.
 - d. Section 2 of 8, Page 39, Box 3: Detailed description of control equipment.
 - e. Section 2 of 8, Page 40, Box 2: Compliance Assurance Monitoring Plan. (see item 2)
 - f. Section 2 of 8, Page 40, Box 3: Alternative Methods of Operation (if applicable).
 - g. Section 3 of 8, Page 52, Box 3: Detailed description of control equipment.
 - h. Section 3 of 8, Page 53, Box 2: Compliance Assurance Monitoring Plan. (see item 2)
 - i. Section 3 of 8, Page 53, Box 3: Alternative Methods of Operation (if applicable).
 - j. Section 4 of 8, Page 78, Box 3: Detailed description of control equipment.
 - k. Section 4 of 8, Page 79, Box 2: Compliance Assurance Monitoring Plan. (see item 2)
 - l. Section 4 of 8, Page 79, Box 3: Alternative Methods of Operation (if applicable).
 - m. Section 5 of 8, Page 104, Box 3: Detailed description of control equipment.
 - n. Section 5 of 8, Page 105, Box 2: Compliance Assurance Monitoring Plan. (see item 2)
 - o. Section 5 of 8, Page 105, Box 3: Alternative Methods of Operation (if applicable).
 - p. Section 6 of 8, Page 130, Box 3: Detailed description of control equipment.
 - q. Section 6 of 8, Page 131, Box 2: Compliance Assurance Monitoring Plan. (see item 2)

"More Protection, Less Process"

www.dep.state.fl.us

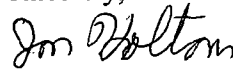
Request for Additional Information

- r. Section 6 of 8, Page 131, Box 3: Alternative Methods of Operation (if applicable).
 - s. Section 7 of 8, Page 156, Box 3: Detailed description of control equipment.
 - t. Section 7 of 8, Page 157, Box 2: Compliance Assurance Monitoring Plan. (see item 2)
 - u. Section 7 of 8, Page 157, Box 3: Alternative Methods of Operation (if applicable).
 - v. Section 8 of 8, Page 160, Box 3: Detailed description of control equipment and designed drift rate.
2. Compliance Assurance Monitoring (CAM). CAM applicability had been addressed and described in previous permitting actions for Unit Nos. 1-4, as not applicable. However, CAM does apply to the MWC Units contained in Permit No. 0570127-002-AC, PSD-FL-086(A) for the controlled emissions of particulate matter (PM) and may apply for other pollutants. Even though the units are exempt from the CAM requirements for the NSPS established emissions limits, they are still potentially subject to the CAM requirements for the prevention of significant deterioration (PSD) established emissions limits. Please propose a CAM plan that will provide reasonable assurances of compliance with the PSD established PM emissions limit. The plan should include the use of the COMS and the pressure drop across the baghouse as monitored indicators. Also include CAM applicability determinations and propose CAM plans as applicable for all other pollutants for which an add-on control device is used to comply with the emissions limits.
3. Equivalency Calculations. It was noted that equivalency calculations were included in the previous renewal application, but they were not evident in this submittal. The dry standard flow rates that were used to show the equivalent allowable emissions in the previous application were listed as 27,289.8 dscfm. The flow rates listed in this application are shown as 36,686 dscfm. Please explain the reason for the increase in the dry standard flow rates and provide the equivalent allowable calculations for all pollutants based on the new Subpart Cb standards.
4. Welding Equipment. Please clarify if the portable welding equipment is powered by electrical generation equipment or internal combustion engines. If powered by internal combustion engines, please evaluate each engine for applicability under 40 Code of Federal Regulations (CFR) 63, Subpart ZZZZ and 40 CFR 60, Subparts IIII or JJJJ.

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. 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 Yousry (Joe) Attalla, E.S.II by telephone at (850) 921-9527 or by e-mail at yousry.attalla@dep.state.fl.us.

Sincerely,



Jon Holtom, P.E.

Title V Section Program Administrator
(850) 921-9531

cc: Mr. Christopher C. Tilman, P.E., Malcolm Pirnie, Inc.: ctilman@pirnie.com
Ms. Diana M. Lee, P.E., Chief Air Permitting, Hillsborough County: Lee@epchc.org
Mr. Stephen R. Hathaway, Hillsborough County: hathaways@epchc.org
Ms. Barbara Friday, DEP-BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Victoria Gibson, DEP-BAR: victoria.gibson@dep.state.fl.us (for reading file)

Friday, Barbara

To: steve.daignault@tampagov.net
Cc: ctilman@pirnie.com; 'lee@epchc.org'; hathaways@epchc.org; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility
Attachments: SteveDaignaultMcKayBayRefuseEnergy0570127-006-AVRAI.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>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday
Division of Air Resource Management (DARM)
Department of Environmental Protection
850/921-9524
Barbara.Friday@dep.state.fl.us

Friday, Barbara

From: Microsoft Exchange
To: steve.daignault@tampagov.net
Sent: Tuesday, December 21, 2010 9:14 AM
Subject: Relayed: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

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

steve.daignault@tampagov.net

Subject: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Steve Daignault [Steve.Daignault@ci.tampa.fl.us]
Sent: Tuesday, December 21, 2010 9:17 AM
To: Friday, Barbara
Subject: Re: Request for Additional Information, File Number 0570127-006-AV -City of Tampa - McKay Bay Refuse to Energy Facility (Out of Office)

I will be out of the office beginning December 20, 2010, and will return January 3, 2011. If you need immediate assistance, please contact the appropriate Department Head or my assistant, Michele Miles, at (813) 274-7883.

Thank you!

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 12/21/10 09:15
>>> >>>

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>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday
Division of Air Resource Management (DARM) Department of Environmental Protection
850/921-9524
Barbara.Friday@dep.state.fl.us<<mailto:Barbara.Friday@dep.state.fl.us>>

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<<http://survey.dep.state.fl.us/?refemail=Barbara.Friday@dep.state.fl.us>>. Thank you in advance for completing the survey.

Friday, Barbara

From: Microsoft Exchange
To: ctilman@pirnie.com
Sent: Tuesday, December 21, 2010 9:14 AM
Subject: Relayed: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

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

ctilman@pirnie.com

Subject: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Tilman, Christopher [CTilman@pirnie.com]
To: Friday, Barbara
Sent: Wednesday, December 22, 2010 8:09 AM
Subject: Read: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Your message was read on Wednesday, December 22, 2010 8:09:05 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: lee@epchc.org; hathaways@epchc.org
Sent: Tuesday, December 21, 2010 9:14 AM
Subject: Relayed: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

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

lee@epchc.org

hathaways@epchc.org

Subject: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Hathaway, Stephen [hathaways@epchc.org]
To: Friday, Barbara
Sent: Tuesday, December 21, 2010 9:16 AM
Subject: Read: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Your message was read on Tuesday, December 21, 2010 9:16:12 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Attalla, Yousry
Sent: Tuesday, December 21, 2010 9:14 AM
Subject: Delivered: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Your message has been delivered to the following recipients:

Attalla, Yousry

Subject: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Attalla, Yousry
To: Friday, Barbara
Sent: Wednesday, December 22, 2010 8:19 AM
Subject: Read: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Your message was read on Wednesday, December 22, 2010 8:19:29 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Holtom, Jonathan; Gibson, Victoria
Sent: Tuesday, December 21, 2010 9:14 AM
Subject: Delivered: Request for Additional Information; File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Your message has been delivered to the following recipients:

Holtom, Jonathan

Gibson, Victoria

Subject: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Monday, January 03, 2011 10:33 AM
Subject: Read: Request for Additional Information, File Number 0570127-006-AV - City of Tampa - McKay Bay Refuse to Energy Facility

Your message was read on Monday, January 03, 2011 10:33:02 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Greig Grotecloss [Greig.Grotecloss@ci.tampa.fl.us]
Sent: Wednesday, January 05, 2011 10:33 AM
To: Friday, Barbara
Cc: Daniel Fahey
Subject: Permit Request

We did receive your request for additional information and are actively working on a response. I was not sure if the original recipient confirmed receipt or not. This confirmation is in regard to permit 0570127-006-AV-City of Tampa-McKay Bay and your request for additional information dated 12/21/10.