



Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

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Tampa, Florida 33607
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RECEIVED

FEB 08 1999

**BUREAU OF
AIR REGULATION**

February 3, 1999

Mr. Scott M. Sheplak, P.E.
Administrator, Title V Section
Department of Environmental Protection
Twin Towers Office Building
1600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: City of Tampa McKay Bay Refuse-to-Energy Facility Title V Permit

Dear Mr. Sheplak:

Thank you for the opportunity to update the City of Tampa's listing of applicable regulations. Transmitted under this cover are the following:

1. An updated owner/authorized representative or responsible official signature page.
2. A letter designating Nancy McCann as the City's authorized Responsible Official in this matter.
3. An updated professional engineer certification.
4. An updated compliance certification.
5. A revised listing of Applicable Regulations.

For your convenience, the above items have been three-hole punched so that you may insert them into the City of Tampa's Title V Application. The following provides the location of these documents in the County's application.

DOCUMENT	LOCATION
Responsible Official Signature Page	Follows First Page
Designation Letter	Should Follow Responsible Official Signature Page
Engineer's Certification	Eighth Page Back
Compliance Certification	Appendix A, Section 10
Listing of Applicable Regulations	Appendix A, Section 1

Mr. Scott M. Sheplak, P.E.

February 3, 1999

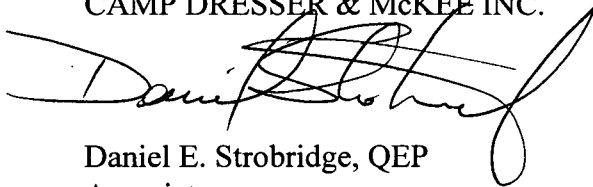
Page 2

Please be advised that the City of Tampa has received a revised PSD permit for this facility since the submission of the Title V Application. It is PSD-FL-086(A). It is my understanding that the Department will include a copy with Tampa's Title V application.

Should you have any questions in this regard, please do not hesitate to contact me.

Sincerely,

CAMP DRESSER & McKEE INC.



Daniel E. Strobridge, QEP
Associate

Enclosures

c: Nancy McCann, City of Tampa

cc - Ed Svec

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:

Name: Nancy McCann
Title: Project Coordinator

2. Owner/Authorized Representative or Responsible Official Mailing Address:

Organization/Firm: City of Tampa
Street Address: 306 E. Jackson Street
City Hall Plaza, 5N
City: Tampa State: Florida Zip Code: 33602

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:

Telephone: (813)274-8090 Fax: (813)274-8035

4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative of the non-Title V source addressed in this Application for Air Permit or the responsible official, as defined in Rule 62-210.200, F.A.C., of the Title V source addressed in this application, whichever is applicable. 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. 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 any permitted emissions unit.*


Signature

1/21/99
Date

* Attach letter of authorization if not currently on file.



CITY OF TAMPA

Dick A. Greco, Mayor

November 4, 1997

NOV - 4 1997

Dr. Rick Garrity
Department of Environmental Protection of Hillsborough County
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Dr. Garrity:

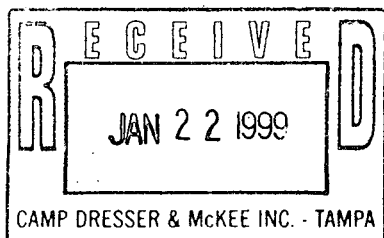
Please accept this letter as authorization for Nancy McCann, Urban Environmental Coordinator for the City of Tampa's Solid Waste Department to sign permit applications and other related documents pertaining to the McKay Bay Refuse-to-Energy Complex. Ms. McCann is the City's authorized representative for dealing with regulatory agencies on issues concerning the McKay Bay Refuse-to-Energy Complex.

Please contact Ms. McCann if any additional documentation is required. She can be reached at (813)274-8090.

Sincerely,

Dick A. Greco
Mayor

cc: Sam Halter, Chief Administrative Officer
Mike Salmon, Environmental Services/Public Works Projects Coordinator
Wayne Brookins, Director, Solid Waste Department
Nancy McCann, Urban Environmental Coordinator



4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

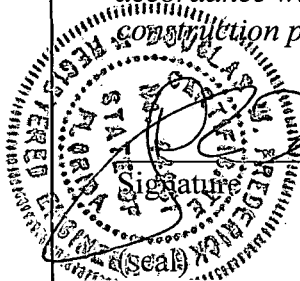
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(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.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X] 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 schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [] 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.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] 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.



Signature

Date

1/26/99


* Attach any exception to certification statement.

1. Part 6-1

COMPLIANCE CERTIFICATION

Compliance statements will be submitted to DEP on an annual basis, or as required throughout the permit term.

I, the undersigned, am the responsible official as defined in Chapter 62-210. 200 F.A.C., of the Title V source for which this report is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this report are true, accurate, and complete.



Responsible Official

1/21/99

Date

**LIST OF APPLICABLE REGULATIONS
McKAY BAY REFUSE-TO-ENERGY FACILITY
INITIAL TITLE V OPERATION PERMIT APPLICATION**

Facility Applicable Regulations:

Florida Title V "Core List" regulations (dated 3/25/96) applicable to the facility and any other regulations applicable to the facility or specific emission units are given below

40 CFR 82	Protection of Stratospheric Ozone (Core List)
FAC 62-4	Permits (Core List)
FAC 62-103	Rules of Administrative Procedure (Core List)
FAC 62-204.800(8)	Federal Regulations Adopted (40 CFR 60 Subpart Cb)
FAC 62-210	Stationary Sources-General Requirements (as listed below)
FAC 62-210.300	Permits Required
FAC 62-210.300(3)(a)5	Exemption for internal combustion engines in boats, aircraft and vehicles used for transportation of passengers or freight (earth moving equipment and solid waste delivery vehicles at resource recovery facility and landfill areas)
FAC 62-210.300(3)(a)16	Exemption for brazing, soldering or welding equipment
FAC 62-210.300(3)(a)20 -(3)(a)21	Exemption for emergency electrical generators, heating units, and general purpose internal combustion engines not subject to Acid Rain Program
FAC 62-210.300(5)	Notification of Startup (for sources shutdown > 1 year)
FAC 62-210.300(6)	Emission Unit Reclassification
FAC 62-210.350	Public Notice and Comment
FAC 62-210.350(3)	Additional Public Notice Requirements...for Title V Sources
FAC 62-210.360	Administrative Permit Corrections
FAC 62-210.370 (3)	Annual Operating Reports
FAC 62-210.550	(GEP) Stack Height Policy
FAC 62-210.650	Circumvention
FAC 62-210.700	Excess Emissions
FAC 62-210.900	Forms and Instructions
FAC 62-213	Operating Permits for Major Sources of Air Pollution (Core List)
FAC 62-256	Open Burning and Frost Protection Fires (Core List)
FAC 62-296	Stationary Sources-Emission Standards (as listed below)
FAC 62-296.320 (2)	Objectionable Odor Prohibited
FAC 62-296.320 (3)	Industrial, Commercial, and Municipal Open Burning Prohibited
FAC 62-296.320(4)(c)	Unconfined Emissions of Particulate Matter
FAC 62-296.416(3)(e)	Specific Emission Limiting and Performance Standards Mercury Emissions Inventory (Testing Requirements) ^a

^a Since the facility does not have acid gas control equipment, the mercury emission limits in FAC 62-296.416 "Waste-to-Energy Facilities" do not apply until the facility is upgraded to meet the USEPA Emission Guideline requirements (FAC 62-296.416(3)(a)2).

**LIST OF APPLICABLE REGULATIONS
McKAY BAY REFUSE-TO-ENERGY FACILITY
INITIAL TITLE V OPERATION PERMIT APPLICATION
(continued)**

Facility Applicable Regulations (Concluded):

Exemptions from Regulations for Facility and Specific Emission Units:

FAC 62-296.320 (4)(a)	General Particulate Emission Limiting Standards ^b
FAC 62-296.500	RACT - VOC and NO _x Emitting Facilities NOT APPLICABLE ^c
FAC 62-296.600	RACT - Lead NOT APPLICABLE ^d
FAC 62-296.700	RACT - Particulate matter NOT APPLICABLE ^e

MWC Units 1 through 3 Applicable Regulations:

40 CFR 60 Subpart A	New Source Performance Standards-General Provisions
40 CFR 60 Subpart E	Standards of Performance for Incinerators
40 CFR 60 Subpart Cb	Emission Guidelines for Large Municipal Waste Combustors
40 CFR 60.43b	Standards of Performance for Steam generating Units
40CFR 60.44b	Standards of Performance for Steam Generating Units
40 CFR 64	Compliance Assurance Monitoring
40 CFR 68	Chemical Releases

^b Emission units described in this application are not subject to FAC 62-296.320(4)(a). The MWCs are subject to a particulate emission limit elsewhere in this chapter (FAC 62-296.401(3)(a)) and are also exempted by FAC 62-296.320(4)(a)1.b (i.e. burn refuse).

^c Florida VOC RACT rules at FAC 62-296.500 to .516 or FAC 62-296.401 to .415 could be applicable (except for emission units which received BACT/LAER determinations pursuant to FAC 62-212.400/.500) since Hillsborough County is an ozone maintenance area (as defined at FAC 62-204.340(4)(a)). However, there are no VOC RACT requirements in FAC 62-296.500 to .516 or FAC 62-296.401 to .415 applicable to any emissions unit at the McKay Bay Refuse-to-Energy Facility (and the MWCs underwent BACT review as part of the original PSD permits). Also, the VOC and NO_x RACT rules in FAC 62-296.570 are not applicable since these requirements apply only to Broward, Dade, and Palm Beach Counties as described at FAC 62-296.500(1)(b).

^d Florida PM RACT rules at FAC 62-296.700 to .715 or FAC 62-296.401 to .415 could be applicable since the McKay Bay Refuse-to-Energy Facility is within a Pb maintenance area (portion of Hillsborough County as defined at FAC 62-204.340(4)(c)) and therefore located within the "area of influence" (i.e., within 50 km of area boundary). However, there are no Pb RACT requirements in FAC 62-296.601 to .605 applicable to any emissions unit at the complex.

^e Florida PM RACT rules at FAC 62-296.700 to .712 or FAC 62-296.401 to .415 could be applicable (except for emission units which received BACT/LAER determinations pursuant to FAC 62-212.400/.500) since the McKay Bay Refuse-to-Energy Facility is located within a PM maintenance area (portion of Hillsborough County as defined at FAC 62-204.340(4)(b)) and therefore located within the "area of influence" (within 50 km of area boundary). Exemptions from or applicability of PM RACT requirements for each emission unit described in this application are given below:

MWC Units 1-4: Exempted by undergoing PSD review and receiving BACT determination (all MWC units meet the PM emission requirement of 0.08 gr/dscf pursuant to FAC 62-296.401(3))

**LIST OF APPLICABLE REGULATIONS
McKAY BAY REFUSE-TO-ENERGY FACILITY
INITIAL TITLE V OPERATION PERMIT APPLICATION
(concluded)**

FAC 62-210.700	Excess Emissions
FAC 62-296.320(4)(b)	General Visible Emission Standards
FAC 62-296.401(3)	Specific Emission Limiting and Performance Standards Requirements (PM/Odor) for New Incinerators (after 1/18/72) with Charging Rates equal to or greater than 50 tons per day
FAC 62-297.310(1)	Required Number of Tests
FAC 62-297.310(2)	Operating Rate during Testing
FAC 62-297.310(3)	Calculation of Emission Rate
FAC 62-297.310(4)	Applicable Test Procedures
FAC 62-297.310(5)	Required Stack Sampling Facilities
FAC 62-297.310(6)	Frequency of Compliance Tests
FAC 62-297.310(7)	Test Reports