



8/12/87
Atlanta, GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DER

AUG 12 1987

4APT-APB/eaw

AUG 14 1987

BAQM

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

This is to confirm an August 5, 1987, telephone conversation between you and Mr. Wayne J. Aronson of my staff regarding his upcoming inspections of resource recovery facilities in the Tampa and Miami, Florida areas. The following schedule and list of facilities to be visited have been discussed with the appropriate local agency contacts:

August 24, 1987 - Pinellas County Resource Recovery Facility (RRF)
- McKay Bay RRF
- Hillsborough County RRF

August 25, 1987 - City of Lakeland
- Dade County RRF

August 26, 1987 - Palm Beach County RRF

If you have any questions regarding these upcoming inspections, please feel free to contact me or Wayne J. Aronson at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. Iwan Choronenko
Hillsborough County Environmental
Protection Commission

Mr. Patrick Wong
Dade County Environmental
Planning Division

Mr. Peter Hessling
Pinellas County Department of
Environmental Management

Mr. E. J. Sacco
Palm Beach County Health Department

Copied: CHF/BT
Barry Andrews } 8/17/87



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUN 9 1987

4APT-AP/eaw

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DER

JUN 12 1987

BAQM

Mr. Robert Van Deman, P.E., Director
Pinellas County Department of
Solid Waste Management
2800 110th Avenue North
St. Petersburg, Florida 33702

RE: Pinellas County Resource Recovery Facility - Unit 3
(PSD-FL-098)

Dear Mr. Van Deman:

Review of your December 13, 1985, application to construct the 438 mmBTU/hr heat input, mass burn, municipal solid waste fired, energy recovery Unit 3 in Pinellas County, Florida, has been completed. The construction is subject to rules for the Prevention of Significant Deterioration (PSD) of air quality contained in 40 CFR §52.21. The Florida Department of Environmental Regulation (FDER) performed the preliminary determination concerning the proposed construction and published a request for public comment on June 24, 1986. Comments regarding the determination were received from the Pinellas County Department of Solid Waste and addressed in the final determination and by letter dated November 25, 1986, from the Environmental Protection Agency (EPA). On May 22, 1987, EPA prepared a final determination recommending issuance of the PSD permit.

EPA has determined that the construction as described in the application meets all the applicable requirements of 40 CFR §52.21. Accordingly, pursuant to 40 CFR 124.15, the Regional Administrator has made a final decision to issue the enclosed Permit to Construct: Part I. - Specific Conditions and Part II. - General Conditions. This authority to construct, granted as of the effective date of the permit, is based solely on the requirements of 40 CFR §52.21, air quality. It does not apply to other permits issued by this Agency or by other agencies. Please be advised that a violation of any permit condition, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

This final permit decision is subject to appeal under 40 CFR §124.19 by petitioning the Administrator of the EPA within thirty (30) days after receipt thereof. The petitioner must submit a statement of reasons for the appeal and the Administrator must decide on the petition within a reasonable time period. If the

petition is denied, the permit shall become effective upon notice of such action to the parties to the appeal. If no appeal is filed with the Administrator, the permit shall become effective thirty (30) days after receipt of this letter. Upon the expiration of the thirty (30) day period, EPA will notify you of the status of the permit's effective date.

Receipt of this letter does not constitute authority to construct. Approval to construct this mass burn, municipal solid waste fired, energy recovery Unit 3 shall be granted as of the effective date of the permit. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Mr. Bruce Miller, Chief, Air Programs Branch at (404) 347-2864.

Sincerely yours,



Winston A. Smith, Director
Air, Pesticides, and Toxics
Management Division

Enclosure

cc (Enclosure):

✓ Mr. Steve Smallwood, P.E., Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE
PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 U.S.C. §7470 et. seq., and the regulations promulgated thereunder at 40 CFR §52.21, as amended at 50 Fed. Reg. 28550 (July 12, 1985),

The Pinellas County Department of Solid Waste Management
St. Petersburg, Florida

is, as of the effective date of this permit (PSD-FL-098) authorized to construct a 438 mmBTU/hr heat input, mass burn, municipal solid waste fired, energy recovery Unit 3 at the following location:

One mile east of Pinellas Park on
the County's existing Bridgeway Acres
Phase I Landfill Tract

Upon completion of authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Part I. - Specific Conditions and Part II. - General Conditions.

This permit is hereby issued on JUN 9 1987 and shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1).

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and local law.

JUN 9 1987
Date Signed

Lee A. D'Almeida, Acting
Regional Administrator

PART I. - Specific Conditions

1. Emission Limitations

a. Stack emissions from Unit 3 shall not exceed the following:

- (1) Particulate: 0.030 grains per dry standard cubic foot (corrected to 12% CO₂), or a final operating particulate emission limit established after startup, whichever is more stringent. This limit shall be restricted to no more than 0.030 grains per dry standard cubic foot (corrected to 12% CO₂) or no less than 0.020 grains per dry standard cubic foot (corrected to 12% CO₂).

Within 24 months of startup of operation, the County shall submit compliance tests that will be used to determine the new particulate emission limit. The limit will be determined by observed average emission rate (x) from the submitted compliance tests and will be statistically analyzed using the one tailed student T test ($t_{.05} = (x - u) n^{0.5}/s$) at the 95% confidence level to derive a mean emission rate (u), where s is the standard deviation of observed values n. The final operating particulate emission limit shall be this mean emission rate (u).

- (2) Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity.
- (3) SO₂: 170.0 lbs/hr
- (4) Nitrogen Oxides: 254.0 lbs/hr
- (5) Carbon Monoxide: 66.0 lbs/hr
- (6) Lead: 2.80 lbs/hr
- (7) Fluorides: 8.31 lbs/hr
- (8) Beryllium: 9.0×10^{-5} lbs/hr
- (9) Mercury: 0.294 lbs/hr when more than 2205 lbs/day of municipal sludge is fired.
- (10) There shall be a 10% opacity limit for emissions from the refuse bunker and ash handling and loadout. The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks and/or scrap piles.
- (11) Unit #3 is subject to 40 CFR Part 60, Subpart E, New Source Performance Standards, except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.

- b. The municipal solid waste (MSW) incinerator shall not be loaded in excess of its rated capacity of 87,500 pounds per hour MSW or operated in excess of the maximum steam rate of 275,000 pounds per hour.
- c. Compliance Tests
 - (1) a. Compliance tests for particulate matter, lead, SO₂, nitrogen oxides, CO, fluorides, mercury, and beryllium shall be conducted in accordance with 40 CFR §60.8 (a), (b), (d), (e), and (f). An annual test will be conducted for particulate matter.
 - b. Compliance with the opacity standard in condition 1.a.(2) of this part shall be determined in accordance with 40 CFR §60.11 (b) and (e).
 - c. Compliance with the opacity standard in condition 1.a.(10) of this part shall be determined by evaluating emissions from the refuse bunker and ash handling and loadout stations in accordance with EPA reference method 9.
- (2) The following test methods and procedures from 40 CFR Parts 60 and 61 shall be used for compliance testing:
 - a. Methods 1 for selection of sample site and sample traverses.
 - b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis when needed for calculation of molecular weight or percent CO₂.
 - d. Method 4 for determining stack gas flow rate when converting stack velocity to dry volumetric flow rate for use in converting concentrations in dry gases to or from mass emission limits.
 - e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 6 for concentration of SO₂. Two samples, taken at approximately 30 minute intervals, shall constitute one test run.
 - h. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.
 - i. Method 10 for determination of CO concentrations. One sample constitutes one test run.

- j. Method 12 for determination of lead concentration and associated moisture content. One sample constitutes one test run.
 - k. Method 13B for determination of fluoride concentrations and associated moisture content. One sample shall constitute one test run.
 - l. Method 101A for determination of mercury emission rate and associated moisture content. One sample shall constitute one test run.
 - m. Method 104 for determination of beryllium emission rate and associated moisture content. One sample shall constitute one test run.
2. Compliance with condition 1.b shall be determined through the continuous monitoring and recording of the steam production. The devices installed for this purpose shall be adequately maintained and in operation during all periods of steam production.
3. The height of the boiler exhaust stack shall not be less than 161 feet above ground level at the base of the stack.
4. The incinerator boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity, efficiency, and certification number.
5. Fuel
- The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not grease, scum, grit screenings or sewage sludge.
6. Air Pollution Control Equipment
- The permittee shall install, continuously operate, and maintain a particulate emission control device for the control of particulates. This device shall be fully operational upon startup and subsequent firing of the boilers.
7. Continuous Emission Monitoring
- a. Prior to the date of startup and thereafter, the permittee shall install, maintain, and operate the following continuous monitoring systems for the Unit 3 exhaust stack:
 - (1) Continuous emission monitoring (CEM) systems to measure stack gas opacity, CO, and O₂ concentrations for each unit. The systems shall meet the EPA monitoring performance specifications of 40 CFR 60.13 and 40 CFR 60, Appendix B, during initial compliance testing.

- (2) CEM data recorded during periods of startup, shutdown, and malfunction shall be reported but excluded from compliance averaging periods for CO and opacity.
 - (3) Excess emissions for CO emissions shall be defined as any applicable period during which the average emissions of CO, as measured by the CEM, exceeds 150 ppm (4-day rolling average, dry volume, corrected to 8% O₂).
 - (4) Excess opacity resulting from startup or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by EPA for longer duration.
8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup or shutdown shall be prohibited.

9. Reporting

- a. A copy of the results of the stack tests shall be submitted within forty-five days of testing to the Florida DER Bureau of Air Quality Management, the DER Southwest Florida District Office, Pinellas County Department of Environmental Management, and EPA Region IV.
- b. Stack monitoring shall be reported to the DER Southwest District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR Part 60.7.
- c. Addresses for submitting reports are:

EPA, Region IV

Chief, Air Compliance Branch
U. S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Florida Department of Environmental Regulation (DER)

Deputy Chief, Compliance and Ambient Monitoring
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Southwest District Office of DER

District Manager
Department of Environmental Regulation
7601 Highway 301 N.
Tampa, Florida 33610

Pinellas County

Pinellas County Department of Environmental Management
Division of Air Quality
16100 Fairchild Drive
Bldg. V102
Clearwater, Florida 33520

PART II. - General Conditions

1. The permittee shall comply with the notification and record keeping requirements codified at 40 CFR Part 60, Subpart A, 60.7. In addition, the permittee shall provide EPA 30 days notice of any anticipated emission testing demonstrations required under condition 1.a.(1).
2. The permittee shall retain records of all information resulting from monitoring activities and information indicating operation parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
3. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide EPA with the following information in writing within five (5) days of such condition:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emissions.

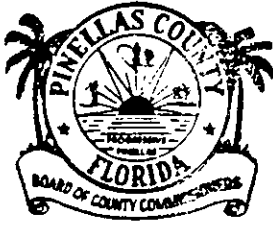
Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of the aforementioned information does not constitute a waiver of the emission limitations contained within this permit.

4. Any proposed change in the information submitted in the application, as modified by the final determination, regarding facility emissions or changes in the quantity or quality of materials processed that would result in new or increased emissions or ambient air quality impact must be reported to EPA. If appropriate, modifications to the permit may then be made by EPA to reflect any necessary changes in the permit conditions.

In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein. Any construction or operation of the source in material variance with the application, as modified by the final determination, shall be considered a violation of this permit.

5. In the event of any change in control of ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit, and EPA of the change in control of ownership within 30 days.

6. The permittee shall allow representatives of the state and local environmental control agency or representatives of the EPA, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Clean Air Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring methods required in this permit;
 - (d) to sample at reasonable times any emissions of pollutants; and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
7. The conditions of this permit are severable, and if any provision of this permit is held invalid, the remainder of this permit shall not be affected.



PINELLAS COUNTY
BOARD OF COUNTY COMMISSIONERS

PHONE 462-3278 • 315 COURT STREET • CLEARWATER, FLORIDA 33516

GEORGE GREER
CHAIRMAN

May 28, 1987

The Honorable Michael Bilirakis
House of Representatives
District 9
1100 Cleveland St., Suite #1600
Clearwater, Florida 33515

The Honorable Michael Bilirakis
House of Representatives
District 9
1530 Longworth House Off. Bldg.
Washington, D.C. 20515

Re: Pinellas County's Resource Recovery Facility

Dear Congressman Bilirakis:

On behalf of the Pinellas County Board of County Commissioners, I wish to thank you for your assistance concerning our recent problem with regard to Pinellas County's Resource Recovery Facility, Unit 3.

This matter has been resolved, and I wanted to express our sincere appreciation for your efforts.

With kindest personal regards,

Sincerely,

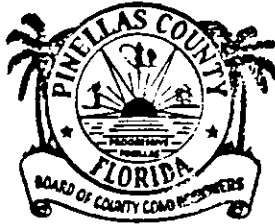
GEORGE GREER
Chairman
Pinellas County Commission

GG:rc

cc: Lee M. Thomas
Jack E. Ravan, Regional Administrator
James H. Sargent, Esquire
Bruce P. Miller, Chief, Air Programs Branch
Susan L. Smith, Esquire
Francis S. Blake, Esquire

0629r

Mike



PINELLAS COUNTY BOARD OF COUNTY COMMISSIONERS

PHONE 462-3278 • 315 COURT STREET • CLEARWATER, FLORIDA 33516

GEORGE GREER
CHAIRMAN

May 28, 1987

The Honorable Robert Martinez
Governor, State of Florida
The Capitol
Tallahassee, Florida 32399

Re: Pinellas County's Resource Recovery Facility

Dear Governor Martinez:

On behalf of the Pinellas County Board of County Commissioners, I wish to thank you for your assistance concerning our recent problem with regard to Pinellas County's Resource Recovery Facility, Unit 3.

This matter has been resolved, and I wanted to express our sincere appreciation for your efforts.

With kindest personal regards,

Sincerely,

GEORGE GREER
Chairman
Pinellas County Commission

GG:rc

- cc: Lee M. Thomas
- Jack E. Ravan, Regional Administrator
- James H. Sargent, Esquire
- Bruce P. Miller, Chief, Air Programs Branch
- Susan L. Smith, Esquire
- Francis S. Blake, Esquire

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