



**RTP ENVIRONMENTAL ASSOCIATES INC.®**

AIR • WATER • SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East  
Green Brook, New Jersey 08812-1909

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May 8, 1996

**RECEIVED**

**MAY 13 1996**

**BUREAU OF  
AIR REGULATION**

Mr. Hamilton S. Oven, Jr., P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Oven:

In response to the May 7, 1996 memo from Syed Arif and A. A. Linero to you, the PPSA conditions of certification dated February 29, 1984 do contain emission limits for Units 1 through 3 of 83 lbs/hour of SO<sub>2</sub>, 132 lbs/hour of NO<sub>x</sub>, and 1.3 lbs/hour of lead. However, the conditions of certification were modified by a final order dated July 28, 1986 (a copy of which is attached). The final revised emission limitations, to which the facility is currently subject to, are 170 lbs/hour of SO<sub>2</sub> for all three units; 254 lbs/hour of NO<sub>x</sub> for unit 3 only, and 4.4 lbs/hour of lead for unit 3 only.

If you have any questions, please feel free to contact either myself at the above number or David S. Dee, Esq. of Landers & Parsons at 904-681-0311.

Sincerely,

RTP ENVIRONMENTAL ASSOCIATES, INC.®

Donald F. Elias  
Principal

cc: ~~A. Linero~~  
S. Arif  
D. Dee, Esq.

R. Stasis

R. Menke

W. Corbin

PCRRF Project File

K.A.B

IN RE:	)	FILE COPY
	)	PINELLAS EOR
PINELLAS COUNTY RESOURCE	)	File No. <u>3.2.2</u>
RECOVERY FACILITY	)	
MODIFICATION OF TERMS AND	)	OGC FILE NO: U5-0470
CONDITIONS OF CERTIFICATION	)	
NO. PA 83-18	)	
PINELLAS COUNTY, FLORIDA	)	

FINAL ORDER MODIFYING  
CONDITIONS OF CERTIFICATION

The Florida Department of Environmental Regulation, after notice and opportunity for hearing, modifies the conditions of certification for the Pinellas County Resource Recovery Facility pursuant to Section 403.516(1), Florida Statutes, and Section VII of the Conditions of Certification, which delegated modifications of emission limitation conditions to the Department.

1. On August 17, 1984, and May 8, 1985, Pinellas County submitted letters to the Department requesting modification of the existing Conditions of Certification for its Resource Recovery Facility to amend emission limitations and compliance monitoring.

2. After review of the request and existing data, the Department proposed to grant relief to Pinellas County by making the following modifications to the conditions of certification.

A. Condition XIV.A.1. shall be changed to read:

1. Emission Limitations upon Operation of Unit 3

a. Stack emissions from each-unit Units 1 or 2 shall not exceed the following:

*confering what 1, 2 always were ASD: PAB*

(1) Particulate matter: in grains per standard cubic foot dry gas corrected to 12% CO<sub>2</sub> - 0.08.

(2) SO<sub>2</sub>-170 lbs/hr each unit

(3) Odor: there shall be no objectionable odor

greater than 20% except as provided for during start-up, shutdown, or malfunctions when the provisions of 17-2.250, FAC, shall apply

b. Emissions from Unit 3 shall not exceed the following:

- (1) Particulate matter: in grains per standard cubic foot dry gas corrected to 12% CO<sub>2</sub> - 0.03.
- (2) SO<sub>2</sub>-170 lbs/hr
- (3) Nitrogen oxides - 254 lbs/hr
- (4) Carbon monoxide - 66 lbs/hr
- (5) Lead - 4.4 lbs/hr
- (6) Mercury - 3200 grams/day when more than 2205 lbs/day of municipal sludge is fired. Compliance shall be determined in accordance with 40 CFR 6.1, Method 101, Appendix B
- (7) Odor - there shall be no objectionable odor
- (8) Visible emissions - stack opacity shall be no greater than 20% except as provided for during start-up, shutdown or malfunctions when the provisions of 17-2.250, FAC, shall apply.

b- c. The height of the boiler exhaust stack shall be less than 161 feet above grade.

e- d. The incinerator boilers shall not be loaded in excess of their rated capacity of 87,500 pounds of municipal solid waste per hour each.

plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity and certification number.

er f. Compliance with the limitations for particulates, opacity, sulfur oxides, nitrogen oxides, carbon monoxide, and lead shall be determined in accordance with Florida Administrative Code Rule 17-2.700, DER Methods 1, 2, 3, 5, 6, 9, or 40 CFR Part 60, Appendix A, Methods 1-7, 9, 10, and 12. Method-7. The stack test shall be performed at  $\pm 10\%$  of the maximum steam rate of 250,000 pounds per hour.

Any party to this Order has the right to seek judicial review of this Order pursuant to Section 120.68, Florida Statutes by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department in the Office of the General Counsel, 2600 Blair Stone Road, Tallahassee, Florida, 32301; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the clerk of the Department.

DONE AND ORDERED the 28 day of July, 1986, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52 (9), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Victoria J. Tschinkel  
Clerk

7/30/86  
Date

Victoria J. Tschinkel  
VICTORIA J. TSCHINKEL  
Secretary

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301  
Telephone: 904/488-9730

al

**PINELLAS COUNTY RESOURCE RECOVERY FACILITY  
AIR POLLUTION CONTROL RETROFIT PROJECT**

14 S. FORT HARRISON AVE. 5TH FLOOR  
CLEARWATER, FL 34616  
PHONE: (813) 464-4913  
FAX: (813) 464-3944

**RECEIVED**

APR 26 1996

BUREAU OF  
AIR REGULATION

April 22, 1996

Clair Fancy  
Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399

**RE: Quarterly Reports of Project Progress**

Dear Mr. Fancy:

Enclosed for your information is a report on progress on the Pinellas County Resource Recovery Facility Air Pollution Control Retrofit Project, addressing activities during the first quarter of 1996. I have also enclosed a copy of the initial progress report, which discussed activities prior to 1996.

If you would like more information about the project, please contact me at your convenience.

Sincerely,



Russell Menke  
Project Facilitator

Enclosures (2)

cc:

Fred Porter - USEPA-RTP  
Walt Stevenson - USEPA-RTP  
Andrew Nguyen - DEP Tampa  
Bill Thomas - DEP Tampa

cc: Syed

**PINELLAS COUNTY RESOURCE RECOVERY FACILITY  
AIR POLLUTION CONTROL RETROFIT PROJECT**

14 S FORT HARRISON AVE. 5TH FLOOR  
CLEARWATER, FL 34616  
PHONE: (813) 464-4913  
FAX: (813) 464-3944

April 15, 1996

Winston Smith  
Director, Division of Air, Pesticides and Toxic Management  
United States Environmental Protection Agency  
345 Courtland Avenue, NE  
Atlanta, Georgia 30365

**RE: Pinellas County Resource Recovery Facility**

Dear Mr. Smith:

Enclosed for your information is a Quarterly Report on project progress. Should you desire any additional information, please contact me at your convenience.

Sincerely,



Russell Menke  
Project Facilitator

Enclosure

cc: Pick Talley  
Mike Rudd  
Julie Yard  
David Dee  
Stu Broom  
Pete Stasis  
Brian Beals  
Scott Davis

*File*

**Pinellas County Resource Recovery Facility  
Air Pollution Control Retrofit Project**

**Quarterly Report on Project Progress For the First Quarter, 1996  
Submitted April 15, 1996**

**Overview**

This Quarterly Report for the retrofit of the Pinellas County Resource Recovery Facility covers the County's activities during the first calendar quarter on 1996 on the retrofit project. In general, the County's overall progress with the retrofit activities has been in accordance with the schedule. Certain activities have proceeded ahead of the previously developed schedules, and other items are not proceeding as fast as previously scheduled. Detailed descriptions of the efforts completed, underway and scheduled for the future are presented in the following paragraphs.

**Actions Taken During Reporting Period**

**Stack Testing of Dioxin Emissions** - Stack tests were conducted during the period from November 7 through November 9, 1995 to measure the levels of dioxin emissions from Units 1 and 2. The laboratory test report was received on January 26, 1996 and submitted to EPA. As a part of the annual compliance testing during the week of March 11, 1996, additional dioxin tests were performed on Unit 1. The results of this most recent round of testing are not yet available, but will be submitted following receipt and quality control review.

**Water Washing of Boilers** - Historically, water washing of boilers had been done on approximately a ten week schedule. Since August of 1995, these washes have been done on approximately an 8 week schedule. Additionally, numerous partial washes are done between the complete washes.

**Florida Power Plant Siting Act (PPSA) Application** - An application for modification of the Conditions of Certification under Florida's Power Plant Siting Act was developed and submitted to the Florida Department of Environmental Protection (FDEP) on May 19, 1995. Additional analyses were performed and submitted in response to FDEP questions, and a supplement to the application was submitted on April 1, 1996. The FDEP issued an amendment to the Facility's PSD permit on October 10, 1995, which authorizes construction of the retrofit. However, the construction and operation of the new air pollution control systems at the Facility must comply with the requirements of the Conditions of Certification under the PPSA. The County has been working with the FDEP to develop appropriate modifications to the Conditions of Certification, and expects to finalize the revised Conditions of Certification, and publish notice of the conditions during April 1996.

Materials Recovery System (MRS) Relocation - In order to minimize downtime during the retrofit of the Facility (to minimize loss of electrical generation and use of landfill space), the existing Materials Recovery System must be relocated as the initial step of the retrofit, prior to the erection of the new air pollution control equipment. The County has negotiated agreements with Wheelabrator Pinellas Inc. (WPI), the operator of the Facility, to construct a new Ash Storage and Processing Building (ASPB) and to relocate the existing MRS equipment into the new ASPB. Design work and procurement are well underway, and actual construction on site is currently scheduled to begin in late May. This portion of the work is proceeding approximately 4 months sooner than originally scheduled, to assure that the overall retrofit project is not delayed by this relocation.

Selection of Design Engineer - Selection of a design engineer to design the Balance of Plant for the retrofit is currently underway, pursuant to Florida's Consultant's Competitive Negotiations Act (CCNA). On January 9, 1996 the Board of County Commissioners selected Stone & Webster and authorized staff to negotiate a contract for the design services. It is currently anticipated that the design engineer will be under contract by mid-April, 1996, approximately one month sooner than originally scheduled.

Updated Health Risk Assessment - The health risk assessment (HRA) dated April 17, 1995 was updated and submitted to USEPA on April 3, 1996, incorporating the results of the dioxin tests conducted in August and November of 1995. The updated HRA reconfirmed that the potential excess lifetime cancer risks from PCDD/F are within or below levels of regulatory concern.

#### **Actions Scheduled but not Completed**

Negotiations for the Construction and Operation of the Retrofit - Negotiations with WPI for the Construction and Operation of the retrofit were originally scheduled for completion in late 1995. However, efforts were concentrated from August through November on developing the agreements related to the construction of the ASPB and relocation of the MRS (see above), so that the construction of the ASPB and relocation of the MRS could proceed early enough as to not delay the construction of the remaining portions of the retrofit. Concentrated efforts are currently underway to finalize an agreement for the construction of the remaining portions of the retrofit, and numerous meetings were held with WPI during January, February and March of 1996 to finalize the agreement for the construction of the new air pollution control equipment. Negotiations on the construction agreement are nearing completion, and negotiations on the management agreement are beginning, with a goal of finalizing the agreements during the second quarter of 1996, so that detailed design and equipment procurement can proceed.



agreements by early in the second quarter of 1996, so that detailed design and equipment procurement can proceed.

Updated Health Risk Assessment - The health risk assessment (HRA) dated April 17, 1995 was scheduled to be updated by December 15, 1995, based on the results of the August, 1995 stack test results. However, as indicated above, the validity of the stack test results for Units 1 and 2 was suspect, and additional testing was done in November of 1995, the results of which testing have not yet been received. Therefore, the HRA update will not be completed until sometime during the first quarter of 1996. The updated HRA will be submitted as soon as it is completed.

#### **Actions Scheduled During Next Reporting Period**

Selection of Design Engineer - It is anticipated that negotiations with Stone & Webster will be completed and a contract will be approved by the Board of County Commissioners in February, 1996. Design efforts will then begin in February or March.

ASPB Construction and MRS Relocation - During the first quarter of 1996, the design of the ASPB and the relocated MRS should be nearly completed. Procurement will begin on long lead time equipment items.

Negotiations of Construction and Operation Agreements - As mentioned previously, negotiations of contracts for the construction and operation of the retrofit are ongoing. These efforts are continuing on an aggressive schedule, and substantial progress is expected during the next quarter.

Health Risk Assessment Update - As mentioned previously, the report of stack tests done in early November has not yet been received. Following quality control review, the results from the report will be incorporated into an update of the health risk assessment dated April 17, 1995. This update will be completed and submitted during the next quarter.

Financing - It is anticipated that the retrofit project will be financed with a combination of current reserve funds and a new bond issue, which is scheduled to be sold in approximately mid-1996. During the next quarter, the development of financing documents will be initiated.

Finalization of Conditions of Certification - Draft Conditions of Certification under the PPSA are currently undergoing review. Issuance of the final Conditions of Certification is expected during the next quarter.

Respectfully Submitted,



Russell Menke  
Project Facilitator

# LANDERS & PARSONS

ATTORNEYS AT LAW

CINDY L. BARTIN  
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JOSEPH W. LANDERS, JR.  
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310 WEST COLLEGE AVENUE  
POST OFFICE BOX 271  
TALLAHASSEE, FLORIDA 32302  
TELEPHONE (904) 681-0311  
TELECOPY (904) 224-5595

## MEMORANDUM

# RECEIVED

APR 23 1996

BUREAU OF  
AIR REGULATION

TO: Buck Oven  
Chip Collette  
Clair Fancy  
Al Linero

FROM: David S. Dee *D. Dee*

DATE: April 22, 1995

RE: Notice For Retrofit of Pinellas County  
Resource Recovery Facility

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On behalf of Pinellas County, we would like you to review the draft notice (attached) that we have prepared concerning the County's plan to retrofit its resource recovery facility and install an auxiliary boiler.

As you know, Pinellas County wants to install new air pollution control equipment and make other improvements to its resource recovery facility. The Florida Department of Environmental Protection already has issued a PSD permit amendment to Pinellas County for these improvements. No notice was published for the PSD permit amendments.

The Department also has prepared a notice, which will be published soon in the Florida Administrative Weekly, that the Department intends to grant the County's request for modification of the conditions of certification for the Facility. The Department has not required the County to publish notice of DEP's intent in a newspaper.

Although we believe that newspaper notice is not mandatory in this case, we would like to avoid any potential procedural problems. Accordingly, the County would like to publish notice of DEP's intent in the legal section of the St. Petersburg Times or another paper of general circulation in Pinellas County. Accordingly, we have prepared a draft notice for your consideration.

Memo to Owen, Collette, Fancy, Linero  
Page Two  
April 22, 1996

We would greatly appreciate it if you would promptly review the attached draft notice and provide us with any comments. We would like to publish this notice within the next five to ten days and, therefore, we would like to receive your comments promptly. Thank you for your assistance.

Please call me if you have any questions (681-0311).

cc: Julie Yard  
Mike Rudd  
Russ Menke

/vc:PIN9

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT  
AND MODIFICATION OF POWER PLANT CERTIFICATION

The Florida Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Pinellas County, Florida for the Pinellas County Resource Recovery Facility (Facility), which is located at 3095 114th Avenue North, in Pinellas County, Florida. The Department also gives notice of its intent to grant the County's request for modification of the conditions of certification that were previously issued for the Facility pursuant to the Florida Electrical Power Plant Siting Act, Section 403.501 et seq., Florida Statutes (F.S.). The Facility consists of three mass burn units, which process municipal solid waste, and related equipment and systems. The permit amendment and the modification to the conditions of certification would authorize the County to construct and operate certain improvements to the Facility that will reduce the Facility's overall environmental impacts. Specifically, Pinellas County has requested an amendment to its permit (PSD-FL-011; PSD-Fl-098) and a modification of the conditions of certification (PA 78-11 and PA 83-18) to allow: the installation of new air pollution control equipment, including an acid gas scrubber system, a fabric filter baghouse, a mercury control system, and an SNCR system for the control of oxides of nitrogen; installation of an auxiliary boiler; a decrease in the size of the certified site to exclude landfilling activities;

modification of ash handling and conditioning systems; operation of water treatment and water recycling systems; and related changes that would allow the continued operation of the Facility in accordance with state and federal regulations. The proposed improvements to the Facility will not increase the Facility's solid waste processing capacity.

The County's request for a permit amendment and modification of the conditions of certification are available for public inspection during normal business hours, 8 AM to 5 PM, Monday through Friday, except holidays, at the Department of Environmental Protection, Bureau of Air Regulation, 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, and the Department of Environmental Protection, Southwest District Office, 8407 Laurel Fair Circle, Tampa, Florida 33610.

A person who is not already a party to the certification proceeding and whose substantial interest will be affected by the Department's proposed action may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000 within 30 days from the date of publication of this notice. Petitioners shall mail a copy of the petition to the applicant's attorney, David Dee, c/o Landers & Parsons, 310 W. College Avenue, P.O. Box 271, Tallahassee, Florida 32302. Failure to file a petition within this time period shall

constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The petition shall contain the following information:

(a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements

specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to the proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 60Q-2.010, F.A.C.

/vc:PINNOT

I N T E R O F F I C E M E M O R A N D U M

Date: 24-Apr-1996 10:54am EST  
From: Alvaro Linero TAL  
LINERO A  
Dept: Air Resources Management  
Tel No: 904/921-9532  
SUNCOM: 291-9532

TO: Hamilton Buck Oven TAL ( OVEN H )  
TO: Chip Collette TAL ( COLLETTE\_C )  
CC: Clair Fancy TAL ( FANCY\_C )  
CC: Syed Arif TAL ( ARIF\_S )

Subject: Notice for Retrofit of Pinellas County RRF

I had a chance to look at the proposed Notice sent by David Dee for the PCRRF Retrofit. I do not consider it necessary to publish it in order to amend the existing PSD permit. We sent them a letter authorizing the project and copied EPA some time ago. Because (to my understanding) it reduces emissions, it did not trigger PSD and we could not really require them to get a permit to make the change. We did require that the letter be attached to their PSD permits.

In short, we already revised the PSD permit. We received no adverse comment from EPA about the public notice aspect. They were obviously pleased that the project is going forward. They are not as concerned as they used to be about so-called federal enforceability of PSD permits. We are satisfied with how we handled it and the certification process will firm things up even more. The Title V permit will tidy all this up even more and provide additional public notice.

After Florida actually adopts the NSPS, with which the project seeks to comply, we will revise the PSD permits using the limits actually promulgated in Florida's version of the rule.

I also don't see any need to revise the Certification to include all the new values because there is not State rule requiring this project (except maybe the mercury part). If the certification is revamped now, then it is all voluntary stuff and we should include a provision which states that it may be revised in accordance with the final version of the NSPS adopted by the DEP.

We have found some incompatibility in the SO2 values set by DEP in the certification when compared with the value set by EPA in one of the original PSD permit. It looks as if PCRRF wants to raise the value in the certification to the higher number even though they will now have SO2 control equipment that they did not have. Raising that number is the only good reason for a public notice. However, we would need to explain why the number is going up when control equipment is being added. I believe the number should go down if



anything. We will as requested, shortly comment on the draft certification modification.