

Adams, Patty

From: Harvey, Mary
Sent: Tuesday, November 28, 2006 9:08 AM
To: Adams, Patty; Sheplak, Scott
Subject: FW: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT ; PSD-FL-011C
also scanned 098C

From: Oswald, Kelsi [mailto:koswald@co.pinellas.fl.us]
Sent: Monday, November 27, 2006 8:45 AM
To: Harvey, Mary
Subject: RE: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

I received the email below. It was caught by our Spam Filter, so I did not actually recover it until this morning.

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

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, November 21, 2006 5:11 PM
To: Talley, Pick; Oswald, Kelsi; don.castro@hdrinc.com; kirk.dunbar@hdrinc.com; ddee@yvlaw.net; Nasca, Mara; Hessling, Peter A; Little.James@epamail.epa.gov
Cc: Sheplak, Scott; Adams, Patty; Gibson, Victoria
Subject: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

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 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,

DEP, Bureau of Air Regulation

11/28/2006

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, November 22, 2006 8:57 AM
To: Adams, Patty
Subject: FW: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

From: Hessling, Peter A [<mailto:p Hesslin@co.pinellas.fl.us>]
Sent: Wednesday, November 22, 2006 7:44 AM
To: Harvey, Mary
Subject: Read: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

Your message

To: p Hesslin@co.pinellas.fl.us
Subject:

was read on 11/22/2006 7:44 AM.

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, November 22, 2006 8:58 AM
To: Adams, Patty; Sheplak, Scott
Subject: FW: Read: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT
Attachments: Read_ Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT.txt

From: David Dee [mailto:ddee@yvlaw.net]
Sent: Tuesday, November 21, 2006 7:36 PM
To: Harvey, Mary
Subject: Read: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, November 22, 2006 9:00 AM
To: Adams, Patty
Subject: FW: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

From: Dunbar, Kirk [<mailto:Kirk.Dunbar@hdrinc.com>]
Sent: Tuesday, November 21, 2006 5:20 PM
Subject: Read: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

Your message

To: Kirk.Dunbar@hdrinc.com
Subject:

was read on 11/21/2006 5:20 PM.

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, November 22, 2006 8:59 AM
To: Adams, Patty
Subject: FW: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

-----Original Message-----

From: Nasca, Mara
Sent: Tuesday, November 21, 2006 7:32 PM
To: Harvey, Mary
Subject: Re: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

Thanks Mary.....Happy Thanksgiving

Sent from my BlackBerry Wireless Handheld

----- Original Message -----

From: Harvey, Mary
To: 'ptalley@co.pinellas.fl.us' <ptalley@co.pinellas.fl.us>; 'koswald@co.pinellas.fl.us' <koswald@co.pinellas.fl.us>; 'don.castro@hdrinc.com' <don.castro@hdrinc.com>; 'kirk.dunbar@hdrinc.com' <kirk.dunbar@hdrinc.com>; 'ddee@yvlaw.net' <ddee@yvlaw.net>; Nasca, Mara; 'phesslin@co.pinellas.fl.us' <phesslin@co.pinellas.fl.us>; 'Little.James@epamail.epa.gov' <Little.James@epamail.epa.gov>
Cc: Sheplak, Scott; Adams, Patty; Gibson, Victoria
Sent: Tue Nov 21 17:11:19 2006
Subject: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

Dear Sir/Madam:

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<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Harvey, Mary
Sent: Wednesday, November 22, 2006 10:42 AM
To: Sheplak, Scott; Adams, Patty
Subject: FW: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

From: Castro, Don [mailto:Don.Castro@hdrinc.com]
Sent: Wednesday, November 22, 2006 10:29 AM
To: Harvey, Mary
Subject: RE: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

Documents received.

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Tuesday, November 21, 2006 5:11 PM
To: ptalley@co.pinellas.fl.us; koswald@co.pinellas.fl.us; Castro, Don; Dunbar, Kirk; ddee@yvlaw.net; Nasca, Mara; phesslin@co.pinellas.fl.us; Little.James@epamail.epa.gov
Cc: Sheplak, Scott; Adams, Patty; Gibson, Victoria
Subject: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT

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Thank you,

DEP, Bureau of Air Regulation

Adams, Patty

From: Harvey, Mary
Sent: Tuesday, November 21, 2006 5:11 PM
To: 'ptalley@co.pinellas.fl.us'; 'koswald@co.pinellas.fl.us'; 'don.castro@hdrinc.com'; 'kirk.dunbar@hdrinc.com'; 'ddee@yvlaw.net'; Nasca, Mara; 'phesslin@co.pinellas.fl.us'; 'Little.James@epamail.epa.gov'
Cc: Sheplak, Scott; Adams, Patty; Gibson, Victoria
Subject: Pinellas County Waste-to-Energy Facility - Permit #1030117-007-AC-DRAFT
Attachments: 1030117.007.AC.D_pdf.zip

Dear Sir/Madam:

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

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Thank you,

DEP, Bureau of Air Regulation

Florida Department of
Environmental Protection

Memorandum

TO: Trina L. Vielhauer, Chief

THRU: A. A. Linero, P.E. *AAL*

FROM: Scott M. Sheplak, P.E. *sms*

DATE: November 21, 2006

SUBJECT: Pinellas County Waste-To-Energy Facility
Facility Improvement Projects
DEP File No.: 1030117-007-AC and PSD-FL-011C & PSD-FL-098C
Day 90 = November 21, 2006

Attached for approval and signature is a Draft air construction permit to authorize the Facility Improvement Projects at the Pinellas County Waste-To-Energy Facility. This facility is located at 3001 110th Avenue North, St. Petersburg, Pinellas County.

This project consists of the replacement of furnace boiler tubes, air preheaters and grate components that have been in service for approximately 20-24 years. This proposed project also includes replacement of the ash processing and storage building as well as other minor equipment.

This facility is an existing major PSD source. The proposed project as conditioned is not subject to PSD. The applicant proposes to use the "baseline actual emissions" to "projected actual emissions" test to avoid PSD. The NSPS Subpart Eb is not triggered because this project is not considered a "modification" or "reconstruction" under the NSPS regulations. The proposed Facility Improvement Projects are estimated to cost approximately \$64.3 million in 2005 dollars.

The Draft permit contains an initial compliance demonstration after completion of the construction/modifications to each emission unit. The permit also contains the PSD avoidance requirements from Rule 62-212.300(1)(c), F.A.C. to ensure PSD is not triggered.

We recommend your approval and signature.

Attachments

AAL/sms

In the Matter of an
Application for Permit by:

Mr. Pick Talley, Director of Utilities
Pinellas County Utility Administration
Department Solid Waste Operations
14 South Fort Harrison Avenue, 5th Floor
Clearwater, Florida 33756

DEP File No.: 1030117-007-AC
and PSD-FL-011C & PSD-FL-098C
Pinellas County Waste-To-Energy Facility
Facility Improvement Projects
Pinellas County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to the Pinellas County Utility Administration, Department Solid Waste Operations for the proposed project, detailed in the application specified above and the attached Technical Evaluation & Preliminary Determination, for the reasons stated below.

The applicant, Pinellas County Utility Administration Department Solid Waste Operations, submitted an air construction permit application on August 1, 2006, to the Department for the Facility Improvement Projects at the Pinellas County Waste-To-Energy Facility in Pinellas County.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. Although no significant net emissions increases are projected to result from the proposed project, the Department has determined that an Air Construction Permit is required.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that the project will not cause significant net emissions increases from the units thus avoiding a review under the rules for the Prevention of Significant Deterioration (PSD) Program under Rule 62-212.400, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of the enclosed Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. 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, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

November 21, 2006

E-MAIL - RECEIVED RECEIPT REQUESTED

Mr. Pick Talley, Director of Utilities
Pinellas County Utility Administration
Department Solid Waste Operations
14 South Fort Harrison Avenue, 5th Floor
Clearwater, Florida 33756

Re: DEP File No.: 1030117-007-AC and PSD-FL-011C & PSD-FL-098C
Pinellas County Waste-To-Energy Facility
Facility Improvement Projects

Dear Mr. Talley:

Enclosed is one copy of the Draft air construction permit for the Facility Improvement Projects at the Pinellas County Waste-To-Energy Facility. This facility is located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The Department's Intent to Issue Air Construction Permit, Public Notice of Intent to Issue Air Construction Permit and Technical Evaluation & Preliminary Determination are also included.

The Public Notice of Intent to Issue Air Construction Permit must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within 7 (seven) days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

Please submit any other written comments you wish to have considered concerning the Department's proposed action to me at the above letterhead address. If you have any questions please call Scott M. Sheplak, P.E. at 850/921-9532.

Sincerely,

Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/AAL/sms

Enclosures

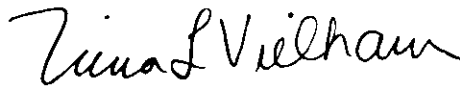
"More Protection, Less Process"

Printed on recycled paper.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

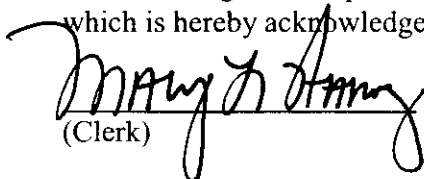
TLV/AAL/sms

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Technical Evaluation & Preliminary Determination and the Draft Permit) and all copies were sent electronically (with Received Receipt) before the close of business on 11/21/06 to the person(s) listed below.

Pick Talley, Pinellas County: ptalley@co.pinellas.fl.us
Kelsi Oswald, Pinellas County: koswald@co.pinellas.fl.us
Donald J. Castro, P.E. HDR Engineering, Inc.: don.castro@hdrinc.com
Kirk Dunbar HDR Engineering, Inc.: kirk.dunbar@hdrinc.com
David Dee, Young Van Assenderp: ddee@yvlaw.net
Mara Nasca, SWD DEP: mara.nasca@dep.state.fl.us
Peter Hessling, PC DEM: phesslin@co.pinellas.fl.us
Jim Little, EPA: little.james@epa.gov

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.


(Clerk) 11/21/06
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No.: 1030117-007-AC and PSD-FL-011C & PSD-FL-098C

Pinellas County Waste-To-Energy Facility
Facility Improvement Projects

Pinellas County

The Department of Environmental Protection (Department) gives notice of its intent to issue an Air Construction Permit to the Pinellas County Utility Administration, Department Solid Waste Operations. The permit will authorize the Facility Improvement Projects at the Pinellas County Waste-To-Energy Facility located in the North of St. Petersburg on 114th Avenue and near I-275 in Pinellas County. A Best Available Control Technology (BACT) determination was not required. The applicant's name and address are Pinellas County Utility Administration Department Solid Waste Operations, 14 South Fort Harrison Avenue, 5th Floor, Clearwater, Florida 33756.

The facility consists of three municipal solid waste combustors, Unit Nos. 1, 2, and 3, with auxiliary burners, lime storage and processing facilities, an activated carbon storage facility, ash storage and processing facilities, a metals recovery system, a cooling tower, ancillary support equipment, and a contiguous municipal solid waste landfill. Units 1 and 2 began commercial operation May 4, 1983; Unit 3 began commercial operation August 1, 1986. Odor is controlled by drawing combustion air from the refuse tipping area. Following retrofit to comply with NSPS - 40 CFR 60, Subpart Cb, spray dry absorbers and baghouses are used for control of acid gases and particulates, selective non-catalytic reduction (SNCR) for control of nitrogen oxides (NOx), and activated carbon injection systems (ACI) for control of mercury (Hg) and certain organic emissions.

The proposed project involves primarily the replacement of existing equipment and systems. In summary, the applicant proposes to replace boiler tubes in the furnace section of the boilers, replace various components of the grate system for each boiler, replace air preheaters for each boiler, replace the ash processing & storage building and make improvements to the facility's air pollution control system. This project's schedule is to replace one boiler furnace per year starting in 2007 or 2008 and ending in 2009 or 2010. This air construction permit authorizes these projects at the existing facility.

The proposed project is subject to 40 CFR 60, Subpart Cb - Emission Guidelines for Existing Large Municipal Waste Combustors as revised and published by the Environmental Protection Agency (EPA) on May 10, 2006.

The Department has reasonable assurance that the project will not result in significant net emission increases from the units thus avoiding a review under the Rules for the Prevention of Significant Deterioration (PSD) Program at Rule 62-212.400, F.A.C. or 40 CFR 52.21. The Department has incorporated provisions in the Draft permit requiring submittal of information on an annual basis for a period of 5 years to confirm that the project did not cause significant net emission increases in actual emissions.

The Department will issue the Final Permit, in accordance with the conditions of the Draft Permit, unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. 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, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/921-9533

Department of Environmental Protection
Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813/632-7600
Fax: 813/744-6458

Pinellas County Department of
Environmental Management
300 South Garden Avenue
Clearwater, Florida 33756-5424
Telephone: 727-464-4422
Fax: 727-464-4420

The complete project file includes the application, technical evaluations, Draft Permit, and the information submitted by the authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak in the Bureau of Air Regulation at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114 for additional information. Key correspondence, the Draft permit and technical evaluation can be accessed by clicking on "Pinellas County Waste-to-Energy Facility" under the "Waste-to-Energy" tab at the following web page: www.dep.state.fl.us/Air/permitting/construction.htm .

Draft

PERMITTEE

Pinellas County Utilities Administration Department Solid Waste Operations 14 South Fort Harrison Avenue, 5 th Floor Clearwater, Florida 33756	DEP File No.: 1030117-007-AC
	Permit No.: PSD-FL-011C & PSD-FL-098C
	Facility ID No.: 1030117 Pinellas County Waste-To-Energy Facility
	Project: Facility Improvement Projects

PROJECT AND LOCATION

This permit is for the Facility Improvement Project at the Pinellas County Waste-To-Energy Facility. This project involves primarily the replacement of existing equipment and systems. In summary, the applicant intends to replace boiler tubes in the furnace section of the boilers, replace various components of the grate system for each boiler, replace air preheaters for each boiler, replace the ash processing & storage building and make improvements to the facility's air pollution control system. This air construction permit authorizes these projects at the existing facility.

This existing facility, Pinellas County Waste-To-Energy Facility, is located at 3001 110th Avenue North, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17, Zone 17, 335.20 km East and 3084.10 km North; Latitude: 27° 52' 23" North and Longitude: 82° 40' 25" West.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the work specified in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

Appendices

The following Appendices are attached as part of this permit.

Appendix GC - General Conditions

Appendix SC - Standard Conditions

Expiration Date: April 30, 2011

Joseph Kahn, P.E.

Director

Division of Air Resource Management

Effective Date

SECTION I. FACILITY INFORMATION (Draft)

FACILITY DESCRIPTION

This existing facility, Pinellas County Waste-To-Energy Facility, is located at 3001 110th Avenue North, St. Petersburg, Pinellas County.

The facility consists of three municipal solid waste combustors (MWC), Unit Nos. 1, 2 and 3, with auxiliary burners, lime storage and processing facilities, an activated carbon storage facility, ash storage and processing facilities, a metals recovery system, a cooling tower, ancillary support equipment and a contiguous municipal solid waste landfill. The gross nominal electric generating capacity of the facility is 75 megawatts (MW). Units 1 and 2 share a common turbine and Unit 3 has a separate turbine. All three units exhaust to a common stack consisting of three separate flues.

The facility is owned by Pinellas County and is currently operated by Wheelabrator Pinellas, Inc. Units 1 and 2 began commercial operation May 4, 1983; Unit 3 began commercial operation August 1, 1986.

PROJECT

The permittee, Pinellas County, proposes to replace boiler furnace tubes and other mechanical equipment that has been in service for approximately 20-24 years. Units 1 & 2 are about 24 years old. Unit 3 is approximately 20 years old. This proposed project would complete the replacement of boiler tubes not completed in the recent Capital Replacement Project (CRP) which was completed in 2003. This proposed project also includes other minor activities like the replacement of the ash processing and storage building.

The site's steam electric generating capacity and MWC throughput will not be increased under this project.

REGULATORY CLASSIFICATIONS

Section 111, Clean Air Act, Standards of Performance for New Stationary Sources: The facility is not subject to 40 CFR 60, Subpart Eb. The facility is subject to 40 CFR 60, Subpart A and Subpart Cb - Emission Guidelines for Existing Sources Municipal Waste Combustors.

Section 112, Clean Air Act, Hazardous Air Pollutants (HAP): The facility is a major source of HAP. The maximum achievable control technology (MACT) requirements typically specified in the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for this industry were included in 40 CFR 60, Subpart Cb as required by Section 129, Clean Air Act, Solid Waste Combustion.

Title IV, Acid Rain: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V, Clean Air Act, Permits: The facility is a Title V or "Major Source" of air pollution because the potential emissions of at least one regulated pollutant exceed 100 tons per year or because it is a Major Source of HAPs. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

Part C, Clean Air Act, Prevention of Significant Deterioration (PSD): The facility is located in an area that is designated as "attainment", "maintenance", or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. The facility is classified as a "municipal incinerator capable of charging more than 250 tons of refuse per day", which is one of the facility categories with the lower

SECTION I. FACILITY INFORMATION (Draft)

PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year, therefore the facility is classified as a “Major Stationary Source” with respect to Rule 62-212.400 F.A.C.

Siting: The facility was originally certified pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

State Emission Limitations and Standards: The facility is regulated under Rule 62-296.401(2), F.A.C., Incinerators and Rule 62-296.416, F.A.C., Waste-to-Energy Facilities.

RELEVANT DOCUMENTS

- Permit 1030117-003-AV, PSD-FL-011 & PSD-FL-098 (A & B);
- Power Plant Siting Act Certification PA78-11 & PA83-18 (A, B & C); and,
- Current Title V Air Operation Permit 1030117-006-AV.

SECTION II. GENERAL AND ADMINISTRATIVE REQUIREMENTS (Draft)

1. **Permitting Authority:** All documents related to applications for permits to construct, modify or operate this emissions unit shall be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (DEP), at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-0114. Copies of these documents shall be submitted to the Compliance Authority.
2. **Compliance Authority:** All documents related to compliance activities such as reports, tests, and notifications should be submitted to the compliance authority. The compliance authority is the Department's Southwest District Office at 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926.
3. **General Conditions:** The owner and operator are subject to, and shall operate under, the attached General Conditions listed in *Appendix GC* of this permit. General Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
4. **Applicable Regulations, Forms and Application Procedures:** Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.); and the Title 40, Parts 51, 52, 60, 63, 72, 73, and 75 of the Code of Federal Regulations (CFR), adopted by reference in Rule 62-204.800, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
[Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
5. **Construction and Expiration:** The Department may extend the expiration date upon a satisfactory showing that an extension is justified. For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, 62-210.300(1), and 62-212.400(6)(b), F.A.C.]
6. **New or Additional Conditions:** For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. **Source Obligation.**
 - (a) Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established

SECTION II. GENERAL AND ADMINISTRATIVE REQUIREMENTS (Draft)

after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification

- (c) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

9. Title V Permit: This permit authorizes construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A Title V operation permit is required for regular operation of the permitted emission units. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Department's Bureau of Air Regulation and a copy to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

The proposed project affects the following existing emission units:

E.U. ID No.	Emission Unit Descriptions
-001	1100 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 1
-002	1100 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 2
-003	1100 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 3
-005	Metals Recovery System (MRS)

Emission Unit Descriptions

Unit Nos. 1, 2, and 3 are Riley Stoker manufactured municipal solid waste (MSW) combustors incorporating grate technology designed and manufactured by Martin GmbH of Munich, Germany, designated as “Unit 1”, “Unit 2”, and “Unit 3”, respectively. Each unit consists of a mass burn waterwall boiler with two auxiliary natural gas fired burners. The burners are used to fire the MSW combustors during start-up, shutdown, and at other times when necessary and consistent with good combustion practices.

Each unit consists of a mass burn water wall boiler with two auxiliary natural gas fired burners. Each of the three municipal waste combustors (MWCs) has a nominal design rate capacity of 1000 tons MSW per day, 417 MMBtu per hour, and 250,000 pounds steam per hour with MSW having a heating value of 5000 Btu per pound. The permitted “operating window” of 110 percent (%) over the nominal design rate of 417 MMBtu heat input corresponds to 458 MMBtu/hr heat input and 275,000 lbs steam/hour per each boiler. Short term capacity is limited in the permit by limiting steam production (275,000 lb/hr), which effectively limits heat input. The net design steam enthalpy for useful work is 1,158 Btu/lb.

Units 1 and 2 began commercial operation May 4, 1983; Unit 3 began commercial operation August 1, 1986. Units 1 and 2 share a common turbine and Unit 3 has a separate turbine. All three units will exhaust to a common stack consisting of three separate flues. Stack height = 165 feet, exit diameter = 8.5 feet, exit temperature = 270 °F, actual volumetric flow rate = 243,117 acfm. Also, the existing generation equipment will be maintained and operated such that the existing three (3) steam generating units supplying the existing two (2) turbine/generator (T/G) sets have a combined electrical output of 75 MW.

Odor is controlled by drawing combustion air from the refuse tipping area. Following retrofit to comply with NSPS - 40 CFR 60, Subpart Cb, spray dry absorbers and baghouses are used for control of acid gases and particulates, selective non-catalytic reduction (SNCR) for control of NOx, and activated carbon injection systems (ACI) for control of Hg and certain organic emissions.

A Metal Recovery System (MRS) is located inside the Ash Storage and Processing Building (ASPB). Emissions Unit 005 is the MRS. The MRS separates up to 112 tons per hour of MWC ash residue into ferrous and nonferrous metal streams and an aggregate stream. The aggregate is later deposited in a

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

landfill. The ASPB is being replaced with a new building with a smaller footprint. The ash residue will be wetted in a quench tank before it is conveyed to the MRS. Fugitive emissions in the ASPB will be controlled by using best management practices, such as water sprays, if necessary. No air pollutant emission control systems are proposed to be used in the replacement ASPB.

Project Description

This air construction permit was issued for the Facility Improvement Projects to avoid the requirements of Rule 62-212.400(4) through (12), F.A.C., based in whole or in part on projected actual emission calculations. The projected actual emissions are shown in the table below. The projected actual emissions were calculated by taking the calculated baseline actual emissions and adding a net increase value. The net increase values selected were numbers just below the SERs that would otherwise have triggered PSD applicability.

Table 1. Facility Baseline and Projected Actual Emissions Estimates

Pollutant	Baseline Actual Emissions, TPY ^a	Projected Actual Emissions, TPY	Net Increase, TPY	PSD Threshold, SER, TPY	Subject to PSD Review?
CO	133	232	99	100	No
NOx	1538	1577	39	40	No
SO ₂	78	117	39	40	No
PM	10	34	24	25	No
PM ₁₀ /MWC Metals	10	24	14	15	No
Lead	0.04	0.54	0.5	0.6	No
Hydrogen Fluoride	0.14	2.14	2	3	No
MWC Organics	2.4E-06	5.4E-06	3.0E-06	3.5E-06	No
MWC Acid Gases	154	193	39	40	No

^a "TPY" means tons per year.

ADMINISTRATIVE REQUIREMENTS

1. Previous Permit Conditions. The following conditions are in addition to those of any other air construction or operation permits. [Rule 62-4.210, F.A.C.]

CONSTRUCTION ACTIVITIES

2. Facility Improvement Projects. This permit authorizes the Facility Improvement Projects described in the application which are primarily replacements of existing equipment and systems. In

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

summary, the applicant is authorized to replace boiler tubes in the furnace section of the boilers, replace various components of the grate system for each boiler, replace air preheaters for each boiler, replace the ash processing & storage building and make improvements to the facility's air pollution control system. [Applicant Request dated July 24, 2006]

3. Unconfined Particulate Emissions. During the construction period, unconfined particulate emissions shall be minimized by dust suppressing techniques such as covering, enclosing, applying water or chemicals to the affected areas, or any combination of techniques, as necessary. [Rule 62-296.320(4)(c), F.A.C.]
4. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

OPERATIONAL DESCRIPTIONS AND LIMITATIONS

5. Nameplate. The refurbished combustors (boilers) shall have a metal name plate affixed in a conspicuous place on the shell showing the manufacturer, model number, type of waste, and rated capacity. [Rules 62-4.160(2) & 62-210.200(PTE), F.A.C.]
6. Permitted Capacity. The site's steam electric generating capacity and MWC throughput shall not be increased as a result of this project. [Rules 62-4.160(2), 62-210.200(PTE) & 62-212.400(12)(c), F.A.C.; 40 CFR 60, Subpart Cb; Design; and, Applicant Request dated July 24, 2006]

NOTIFICATIONS

7. Notifications.
 - a. Within one week of beginning construction, the permittee shall notify the Compliance Authority that the project has commenced and provide a general schedule of the construction activities. [Rule 62-4.210, F.A.C.]
 - b. The permittee shall notify the Compliance Authority when the Facility Improvement Projects have been completed. Completion of this project occurs when all of the Facility Improvement Projects have been installed and are operational. [Rule 62-4.210, F.A.C.]

POST CONSTRUCTION/MODIFICATION INITIAL COMPLIANCE MONITORING, TESTING AND REPORTS

8. Unit Nos. 1, 2, and 3 Initial Compliance Monitoring.
 - a. Each municipal solid waste combustor's emissions shall be monitored using the CEMs after the modifications, construction and changes associated with each unit are complete. The permittee shall monitor emissions of NO_x, SO₂, CO and opacity using the CEMs/COMs consistent with the averaging times specified in Permit No. 1030117-006-AV for each unit.
 - b. The permittee shall submit a compliance report comparing the emissions data from the CEMs/COMs during the period immediately following completion of each refurbished unit to the specific emission limits in Permit No. 1030117-006-AV. The compliance report shall be submitted within 60 days of completion of each refurbished unit. The permittee shall include in the report a statement for each unit as to whether or not each refurbished municipal solid waste combustor is in

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

compliance with the specific emission limits in Permit No. 1030117-006-AV. [Rule 62-4.070(3), F.A.C.]

c. The actual operating rate of each unit during these emissions monitoring periods, specifically, the steam production rate {pounds steam per hour} shall be provided in the compliance report. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

9. Unit Nos. 1, 2, and 3 and Metal Recovery System Initial Compliance Testing.

a. Each municipal solid waste combustor shall be individually tested after the modifications, construction and changes associated with each unit are complete. The permittee shall test emissions of PM, PM₁₀/MWC Metals, Lead, Hydrogen Fluoride, MWC Organics and MWC Acid Gases from Unit Nos. 1, 2, and 3 consistent with the averaging times specified in Permit No. 1030117-006-AV, within 180 days after the commencement of operations of each refurbished unit.

b. The permittee shall submit a compliance report comparing the emissions data during the period immediately following completion of each refurbished unit to the specific emission limits in Permit No. 1030117-006-AV. The report shall be submitted within 45 days of completion of each test. The permittee shall include in the report a statement for each unit as to whether or not the refurbished municipal solid waste combustor is in compliance with the specific emission limits in Permit No. 1030117-006-AV. [Rule 62-4.070(3), F.A.C.]

c. The actual operating rate of each unit during the emissions testing periods, specifically, the steam production rate {pounds steam per hour} shall be provided in the compliance report. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

TEST METHODS AND PROCEDURES

10. Test Methods. Any required stack test shall be performed in accordance with the following methods.

EPA Method	Description of Method and Comments
1 - 4	Determination of Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content. Methods shall be performed as necessary to support other methods.
5	Determination of PM Emissions. The minimum sample volume shall be 30 dry standard cubic feet.
6C	Determination of SO ₂ Emissions (Instrumental).
7E	Determination of NO _x Emissions (Instrumental). NO _x emissions testing shall be conducted with the air heater operating at the highest heat input possible during the test.
9	Visual Determination of Opacity
10	Measurement of CO Emissions (Instrumental). The method shall be based on a continuous sampling train.
23	Measurement of Dioxin/Furan Emissions
26 or 26A	Determination of Hydrogen Chloride Emissions
29	Determination of Metals Emissions from Stationary Sources

The test methods are specified in Appendix A of 40 CFR 60, adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. Tests shall be conducted in accordance with the appropriate test method and the applicable requirements specified in this permit. [Rules 62-204.800, F.A.C.; 40 CFR 60, Appendix A]

11. Testing Requirements. The post construction/modification monitoring and testing performed under specific conditions 8. & 9. shall be conducted between 90% and 100% of permitted capacity. [Rule 62-297.310(7)(a) & (b), F.A.C.]
12. Initial Compliance Demonstrations. The permittee shall provide the Compliance Authority with any other initial emissions performance tests conducted to satisfy vendor guarantees. [Rule 62-297.310(7)(a) and (b), F.A.C.; 40 CFR 60.8]
13. PSD Avoidance Requirements.
 1. Monitoring. The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. The change (proposed projects) shall not increase the design capacity of any emissions unit or its

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

potential to emit that PSD pollutant. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.

- The Department identified the following PSD pollutants that could increase from this project: NO_x, SO₂, CO, PM, PM₁₀/MWC Metals, Lead, Hydrogen Fluoride, MWC Organics and MWC Acid Gases.
- The permittee shall use the same calculation methodology of emissions as outlined in the July 24, 2006 application. In summary, the CEMs shall be used for emissions of NO_x, SO₂ and CO. Stack tests shall be used for emissions of PM, PM₁₀/MWC Metals, Lead, Hydrogen Fluoride, MWC Organics and MWC Acid Gases.

[Rule 62-212.300(1)(e)1., F.A.C. and Applicant Request dated July 24, 2006]

2. **Reporting.** The permittee shall report to the Department by March 1st based on the records required to be generated under subparagraph 62-212.300(1)(e)1., F.A.C., setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:

- a. The name, address and telephone number of the owner or operator of the major stationary source;
- b. The annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.;
- c. If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and,
- d. Any other information that the owner or operator wishes to include in the report.

[Rule 62-212.300(1)(e)2., F.A.C.]

3. **Recordkeeping.** The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1. and 2., F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.

[Rule 62-212.300(1)(e)3., F.A.C.]

4. **Source Obligation.** At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12)(c), F.A.C.]

{Permitting Note: For ease of reference, the Definitions in their entirety or portions thereof for "Baseline Actual Emissions," "Projected Actual Emissions," "Actual Emissions" and "Net Emissions Increase" are reproduced below. The numbering within the Definitions shown below is kept as it appears in the rules for convenience.}

Definition – Actual Emissions, Rule 62-210.200(11), F.A.C. in its entirety.

(11) "Actual Emissions" – The actual rate of emission of a pollutant from an emissions unit as determined in accordance with the following provisions:

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

(a) In general, actual emissions as of a particular date shall equal the average rate, in tons per year, at which the emissions unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of the normal operation of the emissions unit. The Department shall allow the use of a different time period upon a determination that it is more representative of the normal operation of the emissions unit. Actual emissions shall be calculated using the emissions unit's actual operating hours, production rates and types of materials processed, stored, or combusted during the selected time period.

(b) The Department may presume that unit-specific allowable emissions for an emissions unit are equivalent to the actual emissions of the emissions unit provided that such unit-specific allowable emissions limits are federally enforceable.

(c) For any emissions unit that has not begun normal operations on a particular date, actual emissions shall equal the potential emissions of the emissions unit on that date.

Definition - Baseline Actual Emissions, Rule 62-210.200(35)(a), F.A.C. only.

(35) "Baseline Actual Emissions" and "Baseline Actual Emissions for PAL" – The rate of emissions, in tons per year, of a PSD pollutant, as follows:

(a) For any existing electric utility steam generating unit, baseline actual emissions means the average rate, in tons per year, at which the unit actually emitted the pollutant during any consecutive 24-month period selected by the owner or operator within the 5-year period immediately preceding the date a complete permit application is received by the Department. The Department shall allow the use of a different time period upon a determination that it is more representative of normal source operation.

1. The average rate shall include fugitive emissions to the extent quantifiable, and emissions associated with startups and shutdowns.
2. The average rate shall be adjusted downward to exclude any non-compliant emissions that occurred while the source was operating above any emission limitation that was legally enforceable during the consecutive 24-month period.
3. For a PSD pollutant, when a project involves multiple emissions units, only one consecutive 24-month period must be used to determine the baseline actual emissions for the emissions units being changed. A different consecutive 24-month period can be used for each PSD pollutant.
4. The average rate shall not be based on any consecutive 24-month period for which there is inadequate information for determining annual emissions, in tons per year, and for adjusting this amount if required by subparagraph (a)2. above.

Definition - Net Emissions Increase, Rule 62-210.200(200)(a)1., F.A.C. only.

(200) "Net Emissions Increase" –

(a) With respect to any PSD pollutant emitted by a major stationary source, the amount by which the sum of the following exceeds zero:

1. The increase in emissions from a particular physical change or change in the method of operation as calculated pursuant to paragraph 62-212.400(2)(a), F.A.C.

SECTION III. EMISSION UNIT REQUIREMENTS (Draft)

Definition - Projected Actual Emissions, Rule 62-210.200(236), F.A.C. in its entirety.

(236) "Projected Actual Emissions" - The maximum annual rate, in tons per year, at which an existing emissions unit is projected to emit a PSD pollutant in any one of the 5 years following the date the unit resumes regular operation after the project, or in any one of the 10 years following that date, if the project involves increasing the emissions unit's design capacity or its potential to emit that PSD pollutant and full utilization of the unit would result in a significant emissions increase or a significant net emissions increase at the major stationary source. One year is one 12-month period. In determining the projected actual emissions, the Department:

- (a) Shall consider all relevant information, including historical operational data, the company's own representations, the company's expected business activity and the company's highest projections of business activity, the company's filings with the State or Federal regulatory authorities, and compliance plans or orders, including consent orders; and
- (b) Shall include fugitive emissions to the extent quantifiable and emissions associated with startups and shutdowns; and
- (c) Shall exclude that portion of the unit's emissions following the project that an existing unit could have accommodated during the consecutive 24-month period used to establish the baseline actual emissions and that are also unrelated to the particular project including any increased utilization due to product demand growth; or
- (d) In lieu of using the method set out in paragraphs (a) through (c) above, may be directed by the owner or operator to use the emissions unit's potential to emit, in tons per year.

REPORTING AND RECORD KEEPING REQUIREMENTS

14. Stack Test Reports. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Compliance Authority on the results of each such test. The required test report shall be filed with the Compliance Authority as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Compliance Authority to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the specified in Rule 62-297.310(8), F.A.C. [Rule 62-297.310(8), F.A.C.]
15. Test Reports. For each test conducted, the permittee shall file a test report including the information specified in Rule 62-297.310(8), F.A.C. with the compliance authority no later than 45 days after the last run of each test is completed. [Rules 62-297.310(8), F.A.C.]
16. O&M Plans. Any changes made under these projects to air pollution control equipment requires an updated Operation and Maintenance (O&M) Plan to be submitted to the Compliance Authority with a copy to the Pinellas County Air Quality Division. [Rules 62-4.070(3) and 62-4.130, F.A.C. and Section 58-128 of Article IV. of the Pinellas County Comprehensive Air Quality Ordinance]
17. 40 CFR 60, Subpart Cb, Emission Guidelines for Large Municipal Waste Combustors. On or after April 28, 2009, the permittee shall comply with the federal regulation amendments promulgated on May 10, 2006 for existing large MWC units. As part of the amendments, emission limits for Pb, Cd, Hg and PM were lowered. [Rule 62-204.800, F.A.C.]

SECTION IV. Appendices (Draft)

Appendix GC - General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION IV. Appendices (Draft)

Appendix GC - General Conditions

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology ();
 - b. Determination of Prevention of Significant Deterioration ();
 - c. Compliance with National Emission Standards for Hazardous Air Pollutants (); and
 - d. Compliance with New Source Performance Standards ().
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION IV. Appendices (Draft)

Appendix SC - Construction Permit Standard Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at this facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(203), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. **Required Number of Test Runs:** For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

SECTION IV. Appendices (Draft)

Appendix SC - Construction Permit Standard Conditions

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. Required Sampling Time. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.[Rule 62-297.310(4), F.A.C.]
14. Determination of Process Variables
 - a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
 - b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.[Rule 62-297.310(5), F.A.C.]
15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]
17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide

SECTION IV. Appendices (Draft)

Appendix SC - Construction Permit Standard Conditions

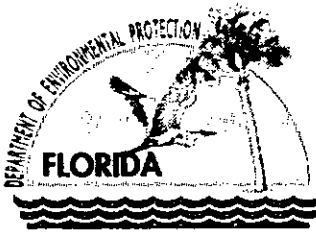
sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

- 1) The type, location, and designation of the emissions unit tested.
- 2) The facility at which the emissions unit is located.
- 3) The owner or operator of the emissions unit.
- 4) The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- 5) The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- 6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- 7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
- 8) The date, starting time and duration of each sampling run.
- 9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
- 10) The number of points sampled and configuration and location of the sampling plane.
- 11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
- 12) The type, manufacturer and configuration of the sampling equipment used.
- 13) Data related to the required calibration of the test equipment.
- 14) Data on the identification, processing and weights of all filters used.
- 15) Data on the types and amounts of any chemical solutions used.
- 16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
- 17) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
- 18) All measured and calculated data required to be determined by each applicable test procedure for each run.
- 19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
- 20) The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
- 21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

19. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
20. **Annual Operating Report:** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C]



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

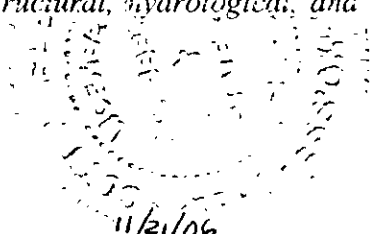
P.E. Certification Statement

Applicant:
Pinellas County Utilities Administration
Department Solid Waste Operations
Pinellas County Waste-To-Energy Facility

Project No.: 1030117-007-AC and
PSD-FL-011C & PSD-FL-098C

Project Type: Air Construction Permit, Facility Improvement Projects

I HEREBY CERTIFY that the engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including but not limited to the electrical, mechanical, structural, hydrological, and geological features).



Scott M. Sheplak

Scott M. Sheplak
Professional Engineer (P.E.)
License Number 48866

11/21/06

Date

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/921-9532
Fax: 850/921-9533

SMS/



TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Pinellas County Waste-To-Energy Facility

Facility ID No.: 1030117

PROJECT

DEP File No.: 1030117-007-AC and PSD-FL-011C & PSD-FL-098C

Facility Improvement Projects

COUNTY

Pinellas County

PERMITTING AUTHORITY

Florida Department of Environmental Protection

Division of Air Resource Management

Bureau of Air Regulation

Air Permitting South Section

Mail Station #5505, 2600 Blair Stone Road

Tallahassee, Florida 32399-2400



November 21, 2006

1. APPLICATION INFORMATION

Applicant Name and Mailing Address

Pinellas County Utility Administration
Department Solid Waste Operations
14 South Fort Harrison Avenue, 5th Floor
Clearwater, Florida 33756

Authorized Representative

Mr. Pick Talley, Director of Utilities
ptalley@co.pinellas.fl.us

Processing Schedule

- Received air construction permit application on August 1, 2006;
- Application complete on August 1, 2006;
- Received Waiver of 90 Day Time Limit on October 26, 2006; and,
- Distributed Intent to Issue Air Construction Permit on November 21, 2006.

Relevant Documents

- Permit 1030117-003-AV, PSD-FL-011 & PSD-FL-098 (A & B);
- Power Plant Siting Act Certification PA78-11 & PA83-18 (A, B & C); and,
- Current Title V Air Operation Permit 1030117-006-AV.

Facility Description, Air Pollution Control Systems and Location

The Pinellas County Waste-to-Energy (WTE) facility consists of three municipal solid waste combustors, Unit Nos. 1, 2, and 3, with auxiliary burners, lime storage and processing facilities, an activated carbon storage facility, ash storage and processing facilities, a metals recovery system, a cooling tower, ancillary support equipment, and a contiguous municipal solid waste landfill. Odor is controlled by drawing combustion air from the refuse tipping area. Following retrofit to comply with NSPS - 40 CFR 60, Subpart Cb, spray dry absorbers and baghouses are used for control of acid gases and particulates, selective non-catalytic reduction (SNCR) for control of NO_x, and activated carbon injection systems (ACI) for control of Hg and certain organic emissions.

The facility is owned by Pinellas County and is currently operated by Wheelabrator Pinellas, Inc. It is located at 3001 110th Avenue North, St. Petersburg, Pinellas County; UTM Coordinates: Zone 17, Zone 17, 335.20 km East and 3084.10 km North; Latitude: 27° 52' 23" North and Longitude: 82° 40' 25" West.

Figure 1 is an aerial view of the facility. Figure 2 is a simplified diagram of the key components of a WTE facility.

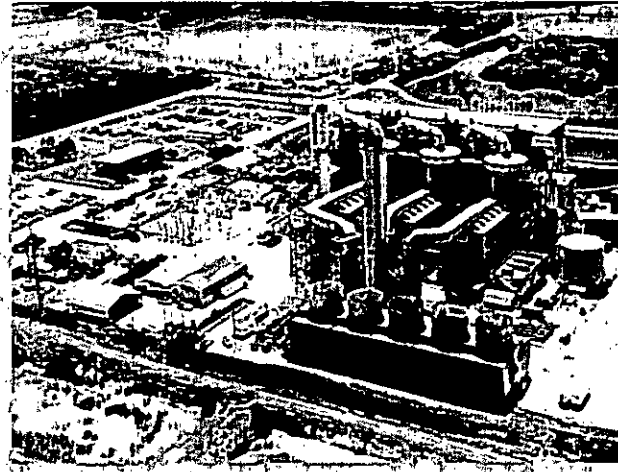


Figure 1. Pinellas County Waste-To-Energy Facility
Picture courtesy Wheelabrator Technologies, Inc. website
<http://www.wheelabratortechnologies.com/WTI/CEP/pinellis.asp>

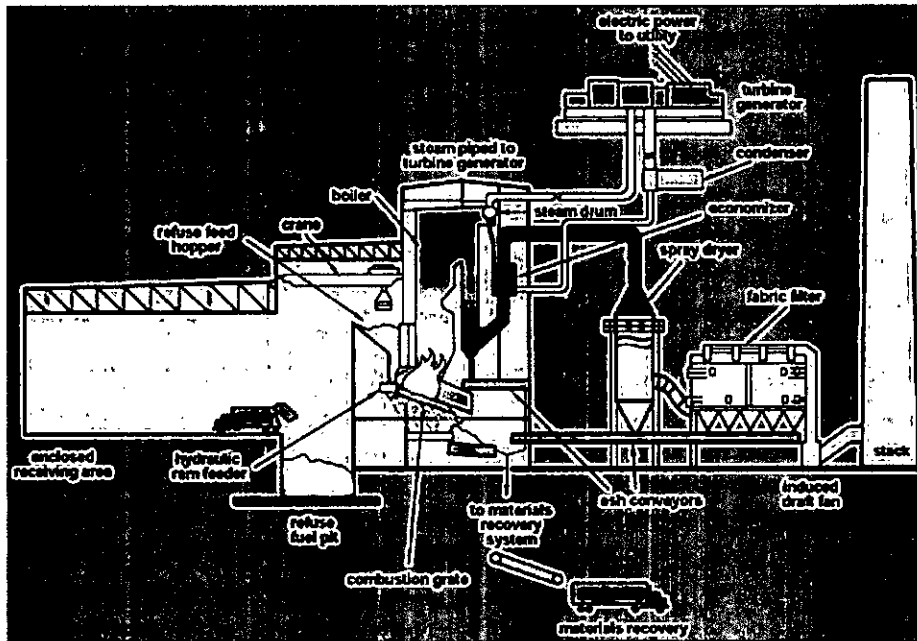


Figure 2. Typical Waste-To-Energy Facility
Picture courtesy Pinellas County website
<http://www.pinellascounty.org/utilities/wte.htm>

Emission Unit Descriptions

Unit Nos. 1, 2, and 3 are Riley Stoker manufactured municipal solid waste (MSW) combustors incorporating grate technology designed and manufactured by Martin GmbH of Munich, Germany. Each unit consists of a mass burn water wall boiler with two auxiliary natural gas fired burners. Each of the three municipal waste combustors (MWCs) has a nominal design rate capacity of 1000 tons MSW per day, 417 MMBtu per hour, and 250,000 pounds steam per hour with MSW having a heating value of 5000 Btu per pound. The permitted "operating window" of 110 percent (%) over the nominal design rate of 417 MMBtu heat input corresponds to 458 MMBtu/hr heat input and 275,000 lbs steam/hour per each boiler. Short term capacity is limited in the permit by limiting steam production (275,000 lb/hr), which effectively limits heat input. The net design steam enthalpy for useful work is 1,158 Btu/lb.

Regulatory Categories

Section 111, Clean Air Act, Standards of Performance for New Stationary Sources: The facility is not subject to 40 CFR 60, Subpart Eb. The facility is subject to 40 CFR 60, Subpart A and Subpart Cb - Emission Guidelines for Existing Sources Municipal Waste Combustors.

Section 112, Clean Air Act, Hazardous Air Pollutants (HAP): The facility is a major source of HAP. The maximum achievable control technology (MACT) requirements typically specified in the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for this industry were included in 40 CFR 60, Subpart Cb as required by Section 129, Clean Air Act, Solid Waste Combustion.

Title IV, Acid Rain: The facility operates no units subject to the acid rain provisions of the Clean Air Act.

Title V, Clean Air Act, Permits: The facility is a Title V or "Major Source" of air pollution because the potential emissions of at least one regulated pollutant exceed 100 tons per year or because it is a Major Source of HAPs. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NOx), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

Part C, Clean Air Act, Prevention of Significant Deterioration (PSD): The facility is located in an area that is designated as "attainment", "maintenance", or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. The facility is classified as a "municipal incinerator capable of charging more than 250 tons of refuse per day", which is one of the facility categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year, therefore the facility is classified as a "Major Stationary Source" with respect to Rule 62-212.400 F.A.C.

Siting: The facility was originally certified under PA83-18 pursuant to the power plant siting provisions of Chapter 62-17, F.A.C.

State Emission Limitations and Standards: The facility is regulated under Rule 62-296.401(2), F.A.C., Incinerators and Rule 62-296.416, F.A.C., Waste-to-Energy Facilities.

2. PROPOSED PROJECT

Project Description

This project involves primarily the replacement of existing equipment and systems that have been in service for approximately 20-24 years. In summary, the applicant intends to replace boiler tubes in the furnace section of the boilers, replace various components of the grate system for each boiler, replace air preheaters for each boiler, replace the ash processing & storage building and make improvements to the facility's air pollution control system.

Units 1 & 2 are about 24 years old. Unit 3 is approximately 20 years old. This project consists of the replacement of furnace boiler tubes, air preheaters and grate components that have been in service for approximately 20-24 years. This proposed project also includes replacement of the ash processing and storage building as well as other minor equipment.

The site's steam electric generating capacity and MWC throughput will not be increased.

A typical waste-to-energy facility's components are shown in Figure 3. As shown by the diagram a typical facility includes an enclosed receiving area, refuse pit, hopper, refuse boiler, ash discharge and air pollution controls such as a scrubber and electrostatic precipitator (ESP) or baghouse.

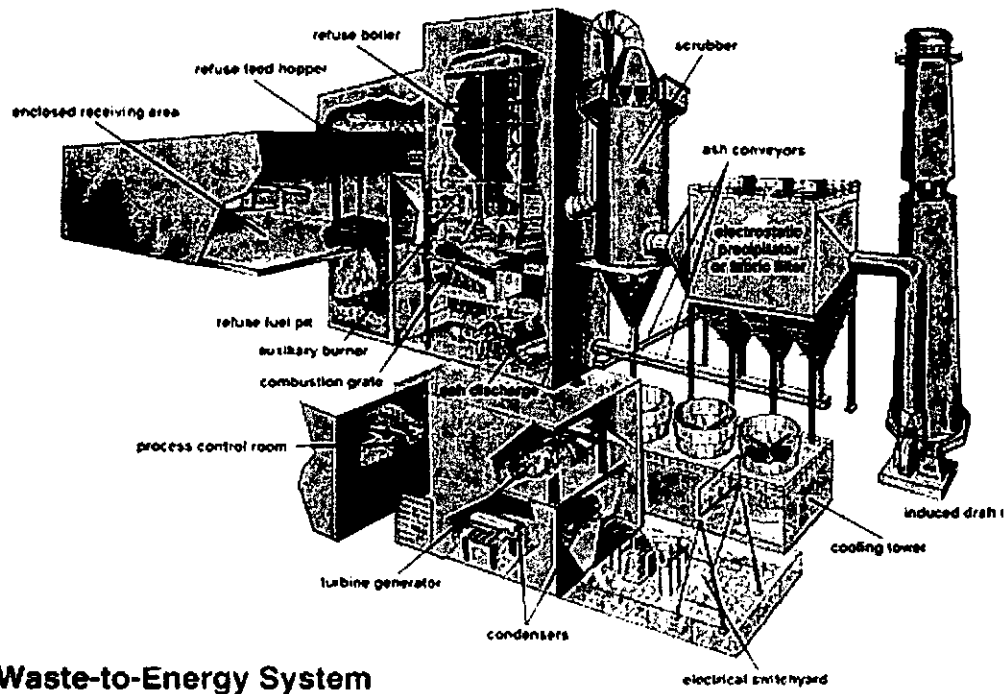


Figure 3. Typical Waste-To-Energy System
Courtesy Pinellas County website
<http://www.pinellascounty.org/utilities/wte.htm>

Detailed pictures of a furnace/boiler section are shown in Figures 4 and 5. Figure 4 is a diagram of a typical municipal waste combustor manufactured by Riley Stoker (now Riley Power). Figure 5 is an actual diagram of one of the Pinellas County boilers from a side elevation showing the furnace where the boiler tubes will be replaced. This diagram also shows the furnace areas and grates that will be replaced. Figure 5 was provided by HDR Engineering, Inc.

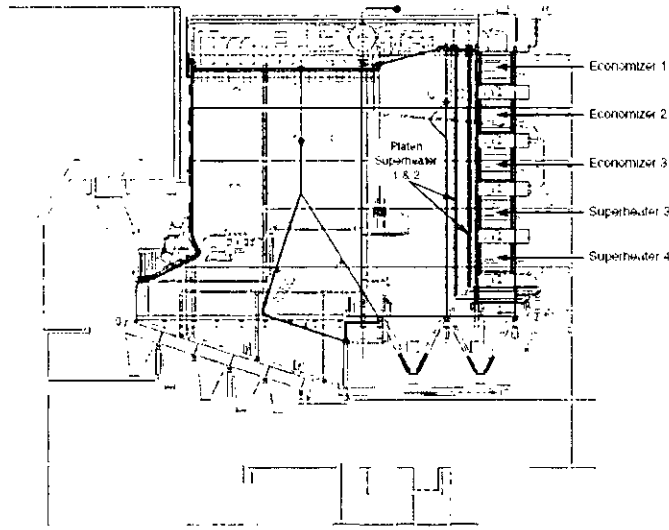


Figure 4. Side Elevation of a Typical Riley Stoker Furnace/Boiler

Pinellas County Boilers General Cross Section

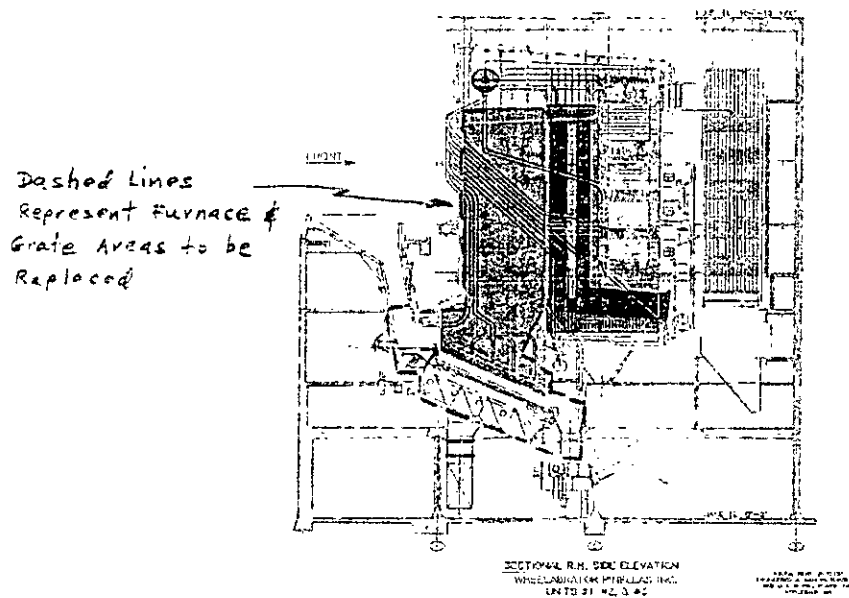


Figure 5. Side Elevation of a Pinellas County Riley Furnace/Boiler Provided by HDR Engineering, Inc.

As previously mentioned the boiler tubes will be replaced under this project. During an October 10, 2006 site visit Mr. Donald J. Castro, P.E. with HDR Engineering, Inc., discussed further details of the boiler tube replacements with the Department's representative.⁴ A new nickel alloy called Inconel® will be used on the carbon steel boiler tubes. Inconel® is a registered trademark of Special Metals Corporation¹ referring to a family of austenitic nickel-based superalloys. This superalloy is used to provide corrosion protection in the furnace atmosphere. The alloy is combined with carbon steel through a process known as cladding. The production of the new boiler tubes takes place in a factory. The new boiler tubes are anticipated to have a new life of approximately 20 years. Many of the boiler tubes have had Inconel® hand applied by a process similar to welding which is very labor intensive. This new pre-applied nickel alloy is intended to minimize boiler tube repairs.

As mentioned earlier, the Facility Improvement Project also includes the replacement of the ash processing and storage building. A Metal Recovery System (MRS) is located inside the Ash Storage and Processing Building (ASPB). Emissions Unit 005 is the MRS. The MRS separates up to 112 tons per hour of MWC ash residue into ferrous and nonferrous metal streams and an aggregate stream. The aggregate is later deposited in a landfill. The ASPB is being replaced with a new building with a smaller footprint. The ash residue will be wetted in a quench tank before it is conveyed to the MRS. Fugitive emissions in the ASPB will be controlled by using best management practices, such as water sprays, if necessary.

Affected Emission Units

The proposed project affects the following existing emission units:

E.U. ID No.	Emission Unit Descriptions
-001	1100 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 1
-002	1100 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 2
-003	1100 TPD (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit 3
-005	Metal Recovery System (MRS)

Project Schedule

This project's schedule is to replace the specified components in one boiler furnace per year starting in 2007 or 2008 and ending in 2009 or 2010. An expiration date of April 30, 2011, for this air construction permit should allow sufficient time to complete the required monitoring, testing and to submit the test reports.

3. RULE APPLICABILITY

Local Air Rules and Ordinances - Pinellas County

Article	Description
IV.	Pinellas County Comprehensive Air Quality Ordinance http://www.pinellascounty.org/Environment/pagesHTML/airQuality/qa8000.html

Section 58-128 of Article IV. of the Pinellas County Comprehensive Air Quality Ordinance requires sources of air pollution to submit to Pinellas County an Operation and Maintenance

(O&M) Plan for air pollution control equipment with the application for air operation permit. The ordinance contains specifically what is required to be included in the O&M Plan. Any changes made under these projects to air pollution control equipment will require an updated O&M Plan to be submitted to the Pinellas County Air Quality Division.

Federal Regulations

This project is subject to certain applicable federal provisions regarding air quality as established by the EPA in the Code of Federal Regulations (CFR) and summarized below.

Title 40	Description
Part 52	Subpart A, as Applicable and Subpart K – State of Florida SIP Approvals
Part 60	Emission Guidelines for Existing Sources Municipal Waste Combustors., in Particular 40 CFR 60 Subparts A and Cb
Part 70	State Operating Permit Programs

State Regulations

The project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the following rules in the Florida Administrative Code.

Chapter	Description
62-4	Permits
62-17	Electrical Power Plant Siting
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-212	Preconstruction Review (including PSD Requirements)
62-213	Operation Permits for Major Sources of Air Pollution
62-296	Stationary Sources - Emission Standards
62-297	Stationary Sources - Emissions Monitoring

Description of PSD Applicability Requirements

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) Program, as defined in Rule 62-212.400, F.A.C. A PSD review is only required in areas currently in attainment with the National Ambient Air Quality Standard (AAQS) for a given pollutant or areas designated as "unclassifiable" for the pollutant. A new facility is considered "major" with respect to PSD if the facility emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant, or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the facility categories listed in 62-210.200 (definitions, Major Stationary Source), F.A.C., or
- 5 tons per year of lead.

For modifications at existing PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates (SERs) listed in Rule 62-210.200 (Definitions - Significant Emissions Rate), F.A.C. Any

pollutant emissions expected to be above the listed SERs are considered to be “significant” and are subject to PSD preconstruction review which includes the application of best available control technology and an ambient air quality impact analysis, as specified in Rules 62-212.400(8) and (10), F.A.C., for each PSD pollutant exceeding a SER.

Applicant’s PSD Applicability Analysis

The facility was built in the early 1980’s and was equipped only with electrostatic precipitators (ESPs) for air pollution control. An important upgrade was completed in 1999 pursuant to 40 CFR 60, Subpart Cb that required the installation of controls for particulate matter, acid gases, and air toxics such as MWC-metals that greatly reduced emissions. A subsequent Capital Replacement Project (CRP) was permitted in 2000 and completed by 2003. The applicant has demonstrated to the Department that emission decreases actually occurred with the exception of an increase in facility CO emissions of 33 tons per year averaged over calendar year 2004 and 2005.⁵

The Department agrees with the applicant that the previous projects are distinct from the present Facility Improvement Projects. The applicant indicated that PSD does not apply to the new Facility Improvement Projects. The applicant stated that the projects will not cause a significant net emission increase of the facility’s annual emissions. However, it is possible that the projects will increase the facility’s long-term, annual emissions due to an increase in the facility’s availability beyond some “demand growth” that might have been accommodated without the project.

For this project the applicant used the methodology detailed in Rule 62-210.200(34)(a), F.A.C., to calculate the facility’s “baseline actual emissions” and the methodology in Rule 62-210.370, F.A.C., to calculate the facility’s “projected actual emissions.” This information was then used to determine the project’s emissions increase, which is referred to as the “baseline actual emissions” to “projected actual emissions” test. Baseline actual emissions were calculated based on historic CEMs and stack test emissions data. As detailed in the application, the baseline period for actual emissions used by the applicant was from December 20, 2003 to June 2006.

Table 1 summarizes the applicant’s baseline and projected actual emissions estimates for the Facility Improvement Projects and compares the net increases to the PSD pollutant thresholds. The facility’s future (projected) actual emissions are less than the PSD thresholds thus avoiding PSD.

Table 1. Facility Baseline and Projected Actual Emissions Estimates

Pollutant	Baseline Actual Emissions, TPY ^a	Projected Actual Emissions, TPY	Net Increase, TPY	PSD Threshold, SER, TPY	Subject to PSD Review?
CO	133	232	99	100	No
NO _x	1538	1577	39	40	No
SO ₂	78	117	39	40	No
PM	10	34	24	25	No
PM ₁₀ /MWC Metals	10	24	14	15	No
Lead	0.04	0.54	0.5	0.6	No
Hydrogen Fluoride	0.14	2.14	2	3	No
MWC Organics	2.4E-06	5.4E-06	3.0E-06	3.5E-06	No
MWC Acid Gases	154	193	39	40	No

^a "TPY" means tons per year

Department's Review of PSD Applicability

In the CRP project evaluation and final determination the Department considered these units to be EGUs (electric generating units). In this determination the Department maintained this interpretation for purposes of PSD applicability.

Review of annual operating report (AOR) data² from 2000-2005 confirms that the units' hours of operation decreased in 2001, 2002 and 2003 while implementing the CRP project. Unit #2's hours of operation in 2001 were 5,261. Unit #1's hours of operation in 2002 were 5,147. Unit #3's hours of operation in 2003 were 5,903. Operation of the units is typically greater than 7,000 hours/year. Years 2001 through 2003 are therefore not representative of normal operations. The baseline for actual emissions used by the applicant from December 20, 2003 to June 2006, approximately a two (2) year period, is a representative period of actual emissions for this project. Actual emissions are after air pollution controls. A cursory review of emissions data from AORs from 2000-2005 supports the actual emissions used.³

As detailed by the applicant in Table 1, the proposed project is not subject to PSD preconstruction review.

To ensure PSD is in fact not triggered, the facility will be required to track and report actual annual emissions for a five (5) year period. This tracking and reporting will be enforceable through the establishment of conditions in the air construction permit for this project. A PSD applicability report will be required annually during this 5 year period. Conditions for monitoring, reporting and recordkeeping are placed in the permit to provide reasonable assurances that PSD is avoided.

Air Quality Impact Analysis

An air quality impact analysis was not required because this project was not subject to PSD review.

Applicant's NSPS Applicability Analysis

The requirements of the federal emission guidelines of 40 CFR 60, Subpart Cb currently apply to Unit Nos. 1, 2 and 3. A "modification" or "reconstruction" to these emission units would trigger the applicability of the Standards of Performance for New Stationary Sources (NSPS) 40 CFR 60, Subpart Eb. As detailed in the application, the applicant claims the projects will not constitute a "modification" or "reconstruction."

The applicant claims that there will be no increase in physical capacity of these units. Therefore, short term emission rates will not be increased and the project will not result in a "modification" for purposes of NSPS.

The applicant estimated the capital cost of the new proposed projects to be \$64.3 million (year 2005 dollars). The total facility capital maintenance cost since operations began is estimated to be \$79 million (year 2005 dollars), including the costs associated with the previous CRP Project. Adding the capital cost of the proposed project and the capital maintenance costs since operations began results in a total estimated capital cost of \$143.3 million (year 2005 dollars). When comparing this total capital cost to the cost of a newly constructed plant estimated to be \$344.5 million (year 2005 dollars), the federal "reconstruction" provisions are not triggered. In order to be considered a reconstructed facility, the replacement costs would have to exceed 50% of the cost of a newly constructed plant. In this case, the applicant estimates the total replacement costs to be 41% of the cost of a newly constructed plant. The "reconstruction" provision under NSPS therefore is not triggered.

Department's Review of NSPS Applicability

The Department has reviewed the information provided by the applicant. Based on the information provided by the applicant the projects will not constitute a "modification" or "reconstruction" under NSPS.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the Draft Permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant and the conditions specified in the Draft permit.

Scott M. Sheplak, P.E., is the project engineer responsible for preparing the Draft permit and this Technical Evaluation. He may be contacted by e-mail at Scott.Sheplak@dep.state.fl.us or by telephone at 850/921-9532.

REFERENCES

- ¹ Web site for Special Metals Corporation <http://www.specialmetals.com/> .
- ² AOR Data from ARMS AdHoc Report. See excel spreadsheet titled *Pinellas County Waste-To-Energy Facility Hours of Operation 2000-2005*.

- ³ AOR Data from ARMS AdHoc Report. See excel spreadsheet titled *Pinellas County Waste-To-Energy Facility Air Pollutant Emissions Data reported from 2000-2005*.
- ⁴ October 10, 2006 Site Visit and Meeting. Trip Report dated November 1, 2006.
- ⁵ Post-CRP Emissions Reports dated February 28, 2005 and February 28, 2006.

AOR

Pinellas County Waste-to-Energy Facility
Hours of Operation 2000 - 2005

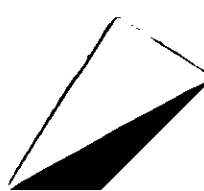
Ad Hoc Reporting				
Grouped by YEAR				
AIRS ID	EU STATUS	EU ID	EU DESCRIPTION	TOTAL OPERATION HOURS/YEAR
YEAR 2000				
1030117 A		1	Municipal Waste Combustor & Auxiliary burners-Unit #1	7473
1030117 A		2	Municipal Waste Combustor & Auxiliary burners-Unit #2	7386
1030117 A		3	Municipal Waste Combustor & Auxiliary burners-Unit #3	7582
YEAR 2001				
1030117 A		1	Municipal Waste Combustor & Auxiliary burners-Unit #1	7076
1030117 A		2	Municipal Waste Combustor & Auxiliary burners-Unit #2	5261*
1030117 A		3	Municipal Waste Combustor & Auxiliary burners-Unit #3	7912
YEAR 2002				
1030117 A		1	Municipal Waste Combustor & Auxiliary burners-Unit #1	5147*
1030117 A		2	Municipal Waste Combustor & Auxiliary burners-Unit #2	8082
1030117 A		3	Municipal Waste Combustor & Auxiliary burners-Unit #3	7838
YEAR 2003				
1030117 A		1	Municipal Waste Combustor & Auxiliary burners-Unit #1	8090
1030117 A		2	Municipal Waste Combustor & Auxiliary burners-Unit #2	8056
1030117 A		3	Municipal Waste Combustor & Auxiliary burners-Unit #3	5903*
YEAR 2004				
1030117 A		1	Municipal Waste Combustor & Auxiliary burners-Unit #1	8081
1030117 A		2	Municipal Waste Combustor & Auxiliary burners-Unit #2	7676
1030117 A		3	Municipal Waste Combustor & Auxiliary burners-Unit #3	8184
YEAR 2005				
1030117 A		1	Municipal Waste Combustor & Auxiliary burners-Unit #1	7775
1030117 A		2	Municipal Waste Combustor & Auxiliary burners-Unit #2	7252
1030117 A		3	Municipal Waste Combustor & Auxiliary burners-Unit #3	7561

#3

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AOR

Pinellas County Waste-to-Energy
Air Pollutant Emissions Data reported from 2000 - 2005

Ad Hoc Reporting					
Grouped by EU ID					
YEAR	AIRS ID	EU STATUS	EU DESCRIPTION	POLLUTANT	ACTUAL EMISSION SUM
EU ID 1					
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	VOC	3.499
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	SO2	38.83
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PM10	1.36
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PM	1.83
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PB	0.00505
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	NOX	526.53
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	NH3	2.06
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	HAPS	15.01
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	H114	0.254
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	H106	14.75
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	H027	0.000626
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	DIOX	0.000001
2005	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	CO	41.75
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	VOC	3.64
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	SO2	39.04
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PM10	1.05
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PM	1.05
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PB	0.00063
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	NOX	510.35
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	NH3	2.14
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	HAPS	41.2
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	H114	0.0529
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	H106	41.17
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	H027	0.000176
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	DIOX	0.000001
2004	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	CO	33.51
2003	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	VOC	3.64
2003	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	SO2	35.6
2003	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PM10	6.84
2003	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PM	6.84
2003	1030117 A		Municipal Waste Combustor & Auxiliary burners-Unit #1	PB	0.013

2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	NH3	2.05
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H114	0.0093
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H027	0.00127
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	CO	23.38
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	SO2	25.18272
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	PM	1.65517
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	NOX	373.72652
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H114	0.01181
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H027	0.00042
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	CO	23.7986
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	CO	27.859548
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	NH3	2
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	PM10	0.936317
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	PB	0.028911
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H114	0.047637
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H027	0.000527
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	SO2	79.829994
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	PM	2.3175

2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	NOX	463.763505
[REDACTED]				
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H114	0.018375
[REDACTED]				
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H046	0.004129
[REDACTED]				
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	H021	0.000003
[REDACTED]				
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #1	DIOX	0
[REDACTED]				

UNIT 2				
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	SO2	15.96
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PM	1.8854
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	NOX	465.8
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	HAPS	25.9
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H106	25.89
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	DIOX	0.000001
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	VOC	3.45
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PM10	2.53
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PB	0.0127
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	NH3	2.03
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H114	0.000641
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H027	0.000806
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	CO	45.85
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	SO2	25.21
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PM	3.26
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	NOX	522.8
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	HAPS	48.302
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H106	48.29

2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	DIOX	0.000008
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	VOC	3.63542
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PM10	1.89148
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PB	0.00121
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	NH3	2.17327
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H106	29.90108
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	DIOX	0.00001
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	VOC	2.368149
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	SO2	21.042212
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PM	0.611832
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	NOX	393.851661
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H114	0.021114
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H027	0.000293
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	CO	15.343779
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H046	0.004124
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H015	0.000581
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	NH3	2
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PM10	2.504314

2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	PB	0.002185
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	NOX	460.335286
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	HAPS	26.2
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H114	0.009361
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H106	22.814972
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	H027	0.000164
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	DIOX	0
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #2	CO	26.0833

EUID:				
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	SO2	13.17
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PM	9.07
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	NOX	454.4
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	HAPS	15.03
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H106	14.98
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H021	0.000037
2005	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	DIOX	0.000001
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	VOC	3.68
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PM10	1.35
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PB	0.00251
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	NH3	2.17
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H114	0.00348
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H027	0.000168
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	FL	0.033
2004	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	CO	51.67
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	SO2	16.16
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PM	2.95
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	NOX	379.76

2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	HAPS	20.916
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H106	20.91
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H021	0.000029
2003	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	DIOX	0.000001
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	VOC	3.52709
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PM10	1.48434
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PB	0.00384
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	NH3	2.44302
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H106	13.29723
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H021	0.0001
2002	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	DIOX	0.000001
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	VOC	3.563701
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	SO2	14.258488
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PM	0.93927
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	NOX	483.263854
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H106	43.280091
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H021	0.000081
2001	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	DIOX	0.000131

2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H133	0.007358
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H114	0.012564
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	H027	0.002581
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	FL	0.29
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	VOC	3.014931
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	SO2	13.86866
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	PM	8.23242
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	HAPS	22.3
2000	1030117 A	Municipal Waste Combustor & Auxiliary burners-Unit #3	CO	18.19006

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