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June 17, 2011

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
2600 Blair Stone Road  
MS #5505  
Tallahassee, Florida 32399-2400

**RECEIVED**

**JUN 20 2011**

**BUREAU OF  
AIR REGULATION**

**RE:** Comments Regarding Public Notice of Intent to Issue Air Permit  
Draft / Proposed Permit No. 1030117-008-AV

On April 28, 2011, the Florida Department of Environmental Protection (FDEP) issued emails to the Pinellas County RRF (Facility) stating that a draft of the Facility's renewal Title V permit was available for review and comment. The Public Notice of Intent to Issue Air Permit for the draft / proposed permit was published on May 21, 2011. The purpose of this letter is to submit Facility comments regarding the draft renewal Title V permit to the FDEP for consideration in accordance with the Comment provisions of the Public Notice.

***A. STATEMENT OF BASIS***

The language in the Statement of Basis regarding the facility description/capacity should be consistent with that in the permit, specifically as referenced in comment 1 to Part B (below).

***B. Title V Air Operation Permit Revision – Main Body***

1. Page 2 of 28 Facility Description

The total capacity of the PCRRF is 3,000 tons/day (TPD) of solid waste with a nominal higher heating value (HHV) of 5,000 British thermal units (Btu)/lb. This description could be misconstrued as a permit limitation. Please replace the word "total" with "nominal" capacity and insert the word "approximately" before 3, 000 tons/day. Otherwise add clarifying language that states this language is descriptive and is not intended as a permit limitation.

PLEASE ADDRESS REPLY TO:  
3095 - 114th Avenue North  
St. Petersburg, Florida 33716  
Phone: (727) 464-7500  
FAX: (727) 464-7713  
Website: [www.pinellascounty.org](http://www.pinellascounty.org)



On the Table "Summary of Emissions Units" it would be helpful to have the Emissions Units listed in numerical order, understanding that E.U. #13 would be out of order as it is in a separate category.

2. Page 3 of 28 Facility Wide Conditions

Table of Applicable Requirements. Please review the E.U. ID No(s) associated with Rule 62-210.300, F.A.C., Permit Required. E.U. #013 is included, but it is an unregulated unit. E.U. Units 15-18 are not included but 11, 12 and 14 are – all of these are regulated engines.

3. Page 4 of 28 Facility Wide Conditions

Resource Recovery Facility Area a.) states "paving and maintenance of roads and parking area". The site may utilize alternative parking areas that are landscaped with rocks or sodded, which also acts as reasonable precaution to unconfined particulate matter. Is there a regulatory basis for the requirement for paving of roads and parking areas?

Landfill, Mulching, and other Areas at the Pinellas County Complex j) states "Periodic sweeping of roads". We request that this language be changed to "Periodic sweeping of paved roads and wetting of unpaved roadways". Many of the internal site roadways within the landfill working area and mulch area are not paved and dust control is accomplished by wetting these roads using a water truck.

4. Page 6 of 28 Subsection A. Paragraph 2

Each of the three municipal waste combustors (MWC) has a nominal design rated capacity of 1,000 tons MSW per day,....based on MSW having a heating value of 5,000 Btu/lb. (suggest adding) Design combustor rated capacity of MSW in tons per day is considered nominal due to variability associated with the higher heating value of the processed waste. The capacities (maximums) are 458 MMBTU hour heat input and 275,000 lbs/hour of steam per boiler. ~~Short term~~ capacity is restricted by steam production to ~~275,000 lbs/hr~~ (suggest adding) "based upon a 4-hour block average" of steam which effectively limits heat input (suggest adding) "in MMBtu/hr". (Suggest Inserting) "Maximum steam production is limited to 275,000 pounds per hour on a 4-hour block average."

All three units exhaust to a common stack consisting of three separate flues. The stack parameters... Suggest using "design" parameters rather than stack parameters for clarity.

5. Page 7 of 28 Subsection A. Condition 4

Capacity: The following maximum values (capacities) shall not be exceeded: (Suggest adding) The method for determining compliance with a, b, and c is utilizing steam production on a 4-hour block average. Please see comment #3 above. There have been many prior discussions with the Department that due to the nature of the MSW, the higher heating value of the MSW is variable and that steam production is the preferred method of determining compliance with capacity limitations for municipal waste combustor load.

(Also suggest deleting condition) "The MWCs shall not be loaded in excess of their maximum operating capacity, equivalent to 3,300 TPD total but no more than 3,000 TPD on a 12-month rolling average." Or alternatively suggest adding "compliance demonstrated based upon steam production" to the end of this condition.

6. Page 7 of 28 Subsection A. Condition 6

The facility shall not burn: (h) grease, scum, and grit screenings. This condition is carried over from the facility's PSD permit. However, it is our understanding this condition applied to grease, scum and grit screenings from wastewater treatment plants. Please clarify the intent of this condition. Would restaurant grease trap waste be prohibited by this condition?

7. Page 9 of 28 Subsection A. Condition 11

This appears to be a historical condition, as the O&M plans were already submitted. Also it states a separate O&M plan must be submitted for each MWC Unit and shall be on file with the Compliance Authority. The MWC Units are substantially similar, other than some internal aspects of the boiler on MWC Unit #3. Also, the PCRRF can not attest that the Compliance Authority is keeping the O&M plan on file.

8. Page 10 of 28, Subsection A Condition 24

There is not a separate refuse bunker and ash handling load out station for MWC Unit #3. This was a condition in the underlying PSD permit, prior to the construction of the first ash processing building. This condition would more appropriately be applied to E.U. #005, Residue Storage and Processing Building. We suggest moving this condition to Subsection B and refer to compliance with Condition B.6.

9. Page 11 of 28 Subsection A. Condition 25

Permitting note: The May 10, 2000 amendments to 40 CFR 60, Subpart Cb changed the allowable excess emissions. There is no mention of this change in this section, and it is requested that this rule language be added as specifically allows for excess emissions greater than the specified 3 hours during specific malfunction events specifically up to 15 hours. Also the oxygen correction was capped at 14% oxygen for these same specific malfunction events, and it is requested that this rule language be added to this condition as well.

10. Page 11 of 28, Subsection A. Condition 31, PM/PM10

The reference to Method 202 is new. None of the emission limits in the draft permit require the use of Method 202. We request that this reference be deleted from the permit.

11. Page 12 of 28, Subsection A Condition 34

The F limit only applies to MWC Unit #3. Please refer to condition A.22. This condition should be revised to remove the reference to testing for F prior to Title V renewal for the other two MWC Units.

12. Page 12 of 28, Subsection A Condition 36

Please see previous comment on Condition A.24.

13. Page 13 of 28, Subsection A Condition 37

- a. *First row, "Reporting Deadline(s)"* – As listed in the "Report" column, the Excess Emissions from Malfunctions report is required only if requested by the Compliance Authority. For clarity, we request that the "Reporting Deadline(s)" language be revised to state the following:

"Every 6 months, if requested in writing by the Compliance Authority, every 3 months"

14. Page 13 of 28, Subsection A Condition 41

This permit term is new and serves no environmental protection purposes. Keeping monthly auxiliary burner fuel usage records, and calculating an equivalent heat input, does not help to ensure compliance with any condition listed in the permit. We request that this permit term be deleted.

15. Page 18 of 28, Subsection B First Paragraph (E.U. #008)

The previous Title V Operating permit had the following language. "The scrubber is operated when deemed necessary by the operator." This language does not appear in the proposed draft permit. We request this language be re-inserted.

16. Page 18 of 28, Subsection B Condition 2

The facility does not have a direct means to demonstrate compliance with the permitted capacity conditions specified in items listed in a through d. The filling rate of the silos is not known until completion of the delivery. Also, this condition erroneously implies that if a hydrated lime delivery takes longer than one hour to unload that it may be a compliance issue even if the visible emissions are below 5%. There is no direct means of weighing the ash loading weight of the RSPB and ACB. These conditions need clarification as to the method of compliance demonstration. In the previous Title V permit there was a permitting note associated with the above condition, however, this permitting note was still unclear to the method of demonstration of compliance.

The underlying basis for these permitted capacities appears to be the initial Title V permit application itself, and this information was supplied as part of the application but was not necessarily intended to be a "permitted capacity" or a limitation. The rules listed in the regulatory citations contain no basis on which to impose these permit limits. Therefore, we request that Condition C.2 be deleted in its entirety or clarified to the method of demonstrating compliance with the specified permitted capacities.

17. Page 19 of 28 Subsection B. Condition 9

The PCRRF can not attest that the Compliance Authority is keeping the O&M plan on file.

18. Pages 20 of 28, Condition B.16

*First row, "Reporting Deadline(s)"* – As listed in the "Report" column, the Excess Emissions from Malfunctions report is required only if requested by the Compliance Authority. For clarity, we request that the "Reporting Deadline(s)" language be revised to state the following:

"Every 6 months, if requested in writing by the Compliance Authority, every 3 months"

19. Page 5 of 28 Subsection D.

It would be helpful to have the E.U. listed in numerical order.

Appendix I – The site does not track the quantity of paint utilized on a daily basis. If appropriate, paint usage is approximated to be less than six gallons per day based upon an annual daily average.

Appendix U – typographical error in Unit Description column, delete the word "no"

Table 2 – CO should indicate a 4-hr average, NOx and SO2 currently indicate 1-hour, but they should indicate a 24-hour average.

Online criteria – We request that the boiler on-line criteria be specified. (Suggest adding) "The boiler is considered off-line (i.e. no longer continuously combusting MSW) when the recorded steam flow is less than or equal to 100 kilo-pounds per hour.

We appreciate the opportunity to submit these comments on the Draft Title V Permit. Please feel free to contact me at (727) 464-7541 if you have any questions or would like to further discuss our comments.

Sincerely,



Robert Hauser, Director  
Utilities Solid Waste Operations

RH/ko