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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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SEP 06 2012
DIVISION OF AIR
RESOURCE MANAGEMENT

PINELLAS COUNTY,

Petitioner,

v.

Air Permit No. 1030117-009 AC
(PSD-FL-420)

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

_____ /

PINELLAS COUNTY'S REQUEST FOR EXTENSION
OF TIME TO FILE PETITION

Petitioner, Pinellas County (the "County"), pursuant to Rule 28-106.111(3), Florida Administrative Code, respectfully requests the Department of Environmental Protection ("Department") to grant the County an extension of time to file a petition for a formal administrative hearing concerning the Department's proposed modification to the air construction permit for the Pinellas County Resource Recovery Facility (Air Permit No. 1030117-009 AC; PSD-FL-420). In support of this request, the County says:

1. On or about December 7, 2011, the County filed an application with the Department for certain revisions to the air construction permit for the County's Resource Recovery Facility ("Facility"), which is located at 3095 114th Avenue North, St. Petersburg, Florida. As the applicant for the requested revision to the air construction permit, the County is affected by the Department's proposed action.

2. On August 22, 2012, the Department distributed its draft air construction permit revision ("Draft Permit") and related documents concerning the Facility. The County received the Draft Permit on August 22, 2012.

3. The Draft Permit is lengthy and raises a variety of complex issues. Among other things, the County is concerned that the Facility will not be able to comply with the new limits that have been proposed by the Department for the Facility's emissions of sulfur dioxide and hydrogen chloride. The County has provided the Department with some preliminary comments concerning the Draft Permit and the County submitted additional emissions data to the Department.

The County's goal is to work cooperatively with the Department and resolve the County's issues informally.

4. The County requests a 45-day extension of time to work with the Department concerning the Draft Permit before the County waives its right to a hearing. The County believes this extension of time will allow the County to resolve its concerns without a formal hearing.

WHEREFORE, the County requests the Department to grant a 45-day extension of time to file a petition for a formal administrative hearing concerning the Draft Permit.

Respectfully submitted this 4th day of September, 2012.

GARDNER, BIST, WIENER, WADSWORTH,
BOWDEN, BUSH, DEE, LAVIA & WRIGHT,
P.A.



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Attorneys for Pinellas County

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and one copy of the foregoing was furnished by hand-delivery to the CLERK'S OFFICE, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Room 633B, Tallahassee, Florida 32399; and a copy by U.S. Mail to Jeff Koerner, Department of Environmental Protection, Division of Air Resources Management, 2600 Blair Stone Road, Mail Station 5500, Tallahassee, Florida 32399, on this 4th day of September, 2012.



Attorney