

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PINELLAS COUNTY,

Petitioner,

v.

DEP Draft Permit No. 1030017-002-AV  
Facility ID No. 1030017DEPARTMENT OF ENVIRONMENTAL  
PROTECTION,

Respondent.

NOTICE OF PINELLAS COUNTY'S WAIVER OF  
EXTENSION OF TIME TO FILE PETITION

Petitioner, Pinellas County (the "County"), pursuant to Rule 28-106.111(3), Florida Administrative Code, respectfully waives its right to an extension of time to file a petition for a formal administrative hearing concerning the Florida Department of Environmental Protection's ("Department") draft Title V air operation permit for the County's Resource Recovery Facility (DEP Permit No. 1030017-002-AV) (the "Draft Permit").

1. The County is the applicant for a Title V air operation permit for the County's Resource Recovery Facility (the "Facility"), which is located at 3001 110th Avenue North, St. Petersburg, Florida.

2. On October 1, 1999, the Department distributed its "Intent to Issue Title V Air Operation Permit" and the Draft Permit for the Facility. As the applicant for the Draft Permit, the County is affected by the Department's proposed action.

3. The County requested and the Department granted several

extensions of time to file a petition concerning the Draft Permit. By order dated April 5, 2000, the Department granted the County's latest request and extended the time to file a petition to May 31, 2000.

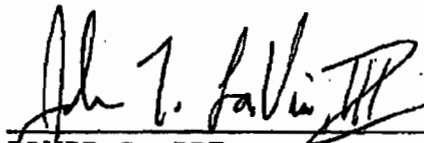
4. The County has resolved all issues with the Department concerning the Draft Permit. Accordingly, the County hereby waives the remaining portion of the extension of time to file a petition granted by the Department's April 5, 2000 order. In addition, the County requests that the Department issue Permit No. 1030017-002-AV.

5. The County's counsel has discussed this request with Scott Sheplak on the Department's staff and Mr. Sheplak indicated that he does not object to this request.

WHEREFORE, the County waives its right to the remaining extension of time to file a petition for a formal administrative hearing concerning the Draft Permit and requests that the Department issue the subject permit.

Respectfully submitted this 16th day of May, 2000.

LANDERS & PARSONS

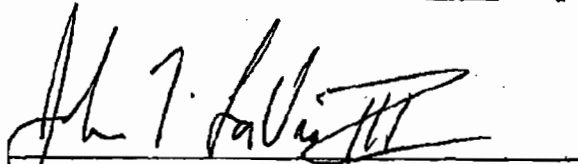


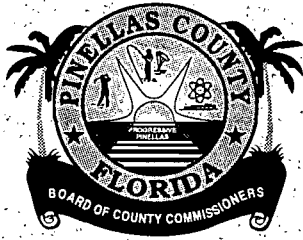
DAVID S. DEE  
Florida Bar No. 281999  
JOHN T. LaVIA, III  
Florida Bar No. 853666  
310 West College Avenue (32301)  
Post Office Box 271  
Tallahassee, Florida 32302  
Phone: 850/681-0311  
FAX: 850/224-5595

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 to Douglas Beason, Department of Environmental Protection, Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, on this 16th day of May, 2000.

  
ATTORNEY



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BOARD OF COUNTY COMMISSIONERS  
PINELLAS COUNTY, FLORIDA

UTILITIES ENGINEERING  
14 SOUTH FORT HARRISON AVENUE  
CLEARWATER, FLORIDA 33756  
PHONE: (727) 464-3588  
FAX: (727) 464-3595

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BARBARA SHEEN TODD

April 17, 2000

Mr. Scott M. Sheplak, P.E.  
Administrator, Title V Section  
State of Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

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APR 25 2000

BUREAU OF AIR REGULATION

RE: PROPOSED Title V Permit No.: 1030117-002-AV  
Pinellas County Resource Recovery Facility

Dear Mr. Sheplak:

During your April 13<sup>th</sup> telephone conference call with RTP Environmental Associates, HDR Engineering, and David Dee, the Department requested additional information regarding operating load and throughput for the Pinellas County Resource Recovery Facility (PCRRF). After reviewing the County's previous submittals, RTP discussed this information in a subsequent telephone conversation with Wendy Alexander on April 17<sup>th</sup>. During this conversation, it was discovered that the March 1999 Title V revisions did not include a revised Section III, Part 4 - page 3 for Unit 3. Attached please find a revised copy of this page for MWC Unit 3 and signed statements by the Responsible Official and Professional Engineer certifying this revision. Please note that Units 1 and 2 will also have the same capacity once the EG retrofits are complete and compliance tests certified by the Department for these units.

The information on this form is consistent with information presented in the retrofit construction permit application, a maximum gross heat input of 458-1/3 MMBtu/hr based on 110% of nominal thermal load using recent evaluations of the operating window. At a design MSW heat content of 5000 Btu/lb, this would correspond to a maximum throughput rate of 1100 tons/day. The Section III, Part 8 form for Unit 3 shows these maximum capacities of 45.83 tons/hour (1100 tons/day) and 401,500 tons/year, reflecting 5000 Btu/lb waste. As we have discussed, the County is willing to accept an annual throughput limit of 383,250 tons/year (equivalent to 1050 tons/day at 5000 Btu/lb) based on rolling 12-month totals to satisfy your concerns regarding the original permit values.



If you have any questions or need any additional information, please feel free to call Don Elias at 732/968-9600. Also, we request that the Department provide us with any corrections to the text of the DRAFT and PROPOSED Title V permit based on this information for our review prior to issuing the PROPOSED Title V permit.

Sincerely,

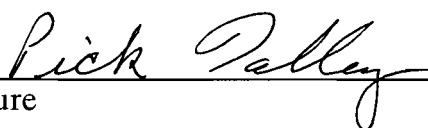


R. P. Stasis, P.E.  
Director of Utilities Engineering

cc: R.Larson/D.Dee,Esq./W.Corbin/PCRRF Proj.File  
Wendy Alexander, FDEP

4/26/00 cc: Scott Sheplek  
Wendy Alexander

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: <b>Mr. Pick Talley, Director of Utilities, Pinellas County</b>
2. Owner/Authorized Representative or Responsible Official Mailing Address:  Organization/Firm: <b>Pinellas County Utilities Administration</b> Street Address: <b>14 South Fort Harrison Avenue, 5th Floor</b> City: <b>Clearwater</b> State: <b>Florida</b> Zip Code: <b>33756</b>
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: <b>(727) 464-3438</b> Fax: <b>(727) 464-3944</b>
4. Owner/Authorized Representative or Responsible Official Statement:  <i>I, the undersigned, am the owner or authorized representative*(check here [ ], if so) or the responsible official (check here [ X ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>   Signature _____ Date <u>4/24/00</u>

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: **R. Peter Stasis**  
Registration Number: **0046220**

2. Professional Engineer Mailing Address:  
Organization/Firm: **Pinellas County Utilities Administration**  
Street Address: **14 South Fort Harrison Avenue, 5th Floor**  
City: **Clearwater** State: **Florida** Zip Code: **33756**

3. Professional Engineer Telephone Numbers:  
Telephone: **(727) 464-3519** Fax: **(727) 464-3595**

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

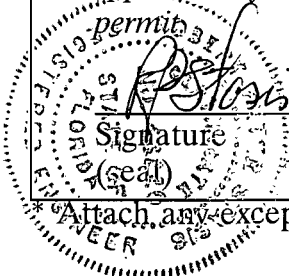
*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

*If the purpose of this application is to obtain a Title V source air operation permit (check here [ X ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [ ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ X ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such*



P.E.

Signature \_\_\_\_\_

4/24/00  
Date \_\_\_\_\_

\*Attach any exception to certification statement.

Mass Burn Incinerator Unit 3

**Emissions Unit Operating Capacity**

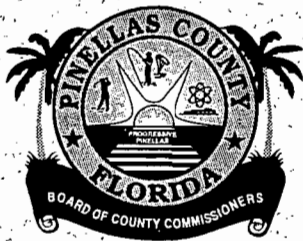
1. Maximum Heat Input Rate:	<b>458-1/3</b> mmbtu/hr
2. Maximum Incineration Rate:	<b>91,667</b> lb/hr <b>1100</b> tons/day
3. Maximum Process or Throughput Rate: <b>Not Applicable</b>	
4. Maximum Production Rate: <b>Not Applicable</b>	
5. Operating Capacity Comment: <b>Maximum Incinerator capacity is based on 110% thermal load at a heating value of 5000 Btu/lb.</b>	

**Emissions Unit Operating Schedule**

Requested Maximum Operating Schedule:		
	<b>24</b> hours/day	<b>7</b> days/week
	<b>52</b> weeks/year	<b>8,760</b> hours/year

III. Parts 4 and 5 - 3





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CLEARWATER, FLORIDA 33756  
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FAX: (727) 464-3595

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BUREAU OF AIR REGULATION

March 29, 2000

Mr. Scott M. Sheplak, P.E.  
Mail Station 5505  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blirstone Road  
Tallahassee, Florida 32399-2400

RE: Pinellas County Title V Permit No. 1030117-002-AV

Dear Mr. Sheplak:

As discussed during your telephone conversation on February 18, 2000, with RTP Environmental Associates, Inc., we are formally requesting a change to the requirements contained in Rule 62-210.700(1), F.A.C. The current requirement in this section states:

*Excess emissions resulting from start-up, shutdown, or malfunction of any emissions units shall be permitted provided (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.*

The Emission Guidelines for large MWCs, promulgated as 40 CFR 60 Subpart Cb, and adopted as Rule 62-204.800(8)(b), F.A.C., has significantly increased the stringency of the standards applied to the facility and increased the complexity of the control equipment. This is discussed in the EPA Background Information Documents and the proposal for the Emission Guidelines, which specifically allows three hours of excess emissions for start-up, shutdown, and malfunctions. This is currently embodied in Condition B-43 of the draft permit. Neither the PPSA Conditions of Certification nor the PSD permit contain the two-hour limitation [PSD-FL-098 (A)]. In fact, the only mention occurs in the original PSD permit [PSD-FL-098, page 21, VII.7. (4)], which states:



RE: Pinellas County Title V Permit  
March 23, 2000  
Page 2

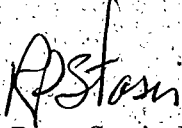
*Excess opacity (emphasis ours) resulting from start-up or shutdown shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity (emphasis ours) shall be minimized, but in no case exceed two hours in any 24-hour period unless specifically authorized by EPA for longer duration.*

This condition only discussed opacity and not emission limits. Therefore, it appears that there is no impediment (as defined by Pat Comer during our February 10, 2000 conference call) to embodying the three-hour requirement within the Title V permit. This would automatically revise the PPSA conditions:

Should you require any additional information or need to discuss this issue further, please feel free to contact us.

Sincerely,

PINELLAS COUNTY



R. Peter Stasis, P.E.  
Director of Utilities Engineering

cc: W. Thomas, FDEP - Southwest District  
P. Talley  
D. Dee, Esq.  
R. Larson  
D. Elias  
W. Corbin



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MAR 29 2000

BUREAU OF AIR REGULATION

March 23, 2000

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32301

RE: Pinellas County Title V Permit No. 1030117-002-AV

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Page 2

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Should you require any additional information or need to discuss this issue further, please feel free to contact us.

Sincerely,

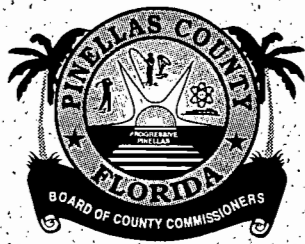
PINELLAS COUNTY



R. Peter Stasis, P.E.  
Director of Utilities Engineering

cc: W. Thomas, FDEP - Southwest District  
P. Talley  
D. Dee, Esq.  
R. Larson  
D. Elias  
W. Corbin

xc: EJ  
Wendy



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BUREAU OF AIR REGULATION

November 17, 1999

Mr. Scott M. Sheplak, P.E.  
 Department of Environmental Protection  
 Bureau of Air Regulation  
 111 South Magnolia Drive, Suite 4  
 Tallahassee, Florida 32301

RE: Pinellas County Draft Permit No.: 1030017-002-AV

Dear Mr. Sheplak:

Pinellas County has reviewed DEP's Draft Title V Permit (Permit No. 1030017-002-AV), for the Pinellas County solid waste complex.

The County appreciates the time and effort expended by the Department staff in developing the draft permit. However, there are several issues which the County believes should be revised prior to finalizing the permit. These issues are summarized in the attached document.

Thank you for your consideration. The County looks forward to working with the Department to complete a permit acceptable to both parties.

Sincerely,

PINELLAS COUNTY UTILITIES

*Pick Talley*  
 Pick Talley  
 Director

*11/22/99 cc: Scott Sheplak  
 Wendy Alexander*

Attachment  
 cc: W. Thomas, FDEP - SW District



**Clarifications, Draft Permit No.: 1030017-002-AV  
Pinellas County, Florida**

Specific comments from the County are listed below in bold face type. Suggested permit language is included below each comment where applicable.

**(1) In the draft permit (p. 1), the facility address is listed as 3095 114th Avenue North (i.e., the mailing address for the Department of Solid Waste). In permit applications, we have listed the facility location as 3001 110th Avenue North. Please revise the draft permit to state:**

This permit is for the operation of the Pinellas County Resource Recovery Facility located at **3001 110th** Avenue North, St. Petersburg, Pinellas County. UTM Coordinates: Zone 17, 335.20 km East and 3084.10 km North; Latitude: 27° 52' 23" North and Longitude: 82° 40' 25" West.

**(2) Retrofit compliance tests for Unit 2 have already been completed. Unit 2 is therefore subject to the requirements in 40 CFR 60, Subpart Cb and not the previous, superseded permit conditions. The draft permit should be revised accordingly, to remove Unit 2 from Part A.**

**Retrofits to Unit 1 should be completed in six to nine months. Therefore, if the Department delays the issuance of the final Title V permit, all the previous permit conditions will be superseded by the Subpart Cb requirements and can be excluded from the final permit.**

**(3) In the Statement of Basis and elsewhere throughout the Draft Permit, it is stated that Units 1, 2, and 3 are rated at a maximum steam production of 250,000 lbs./hr when firing MSW at a maximum MSW charging rate of 1,050 tons per day. The revised PPSA Conditions of Certification for the Pinellas County Municipal Waste Combustors do not contain any restrictions on throughput for the retrofit units based on a tonnage limit. Instead, as noted by the Department on pages 7 and 25 of the draft permit, steam flow is the main process throughput parameter to be monitored for these units. The maximum steaming rate is 275,000 lbs./hr, as shown on the top of page 19 of the May 22, 1987 USEPA PSD Permit.**

**However, in an attempt to be responsive to Departmental concerns, Pinellas County is willing to accept restrictions similar to those proposed for the City of Tampa. Specifically the County will accept a throughput limit of 1,050 tons per day, as determined by a rolling 12-month average, (See Statement of Basis, first paragraph, City of Tampa Title V Draft Permit, No.0570127-001-AV). Compliance with this condition can be determined from the requirements of Condition B.100 and B.101 in the existing permit.**

**The maximum gross heat input for each unit should also be revised to 458 MMBtu/hr everywhere in the draft permit to be consistent with the construction permit application for**

**Clarifications, Draft Permit No.: 1030017-002-AV  
Pinellas County, Florida**

**the retrofit units which was approved by the Department on October 11, 1995 and is reflected in the revised PPSA Conditions of Certification. Since the MWC capacity is limited by heat release rates (which is related to gross heat input). The MWC Emission Unit descriptions should be revised from "1050 TPD (maximum) MWCs" to either "458 MMBtu/hr (maximum) MWCs" or "275,000 lbs. Steam/hour (maximum) MWCs."**

**As noted above, Pinellas County is requesting that short-term tonnage and gross heat input limits be dropped similar to the City of Tampa draft permit, since short-term capacity is limited only by steam production. Condition B.9.(a) should be revised as follows.**

**B.9. Capacity.**

(a) Each of the three municipal waste combustor (MWC) units shall have a maximum capacity of ~~250,000~~ **275,000** pounds of steam produced per hour based on a 4-hour block averaged measurement. ~~The individual MWC unit throughput shall not exceed~~ ***The maximum short-term capacity is 1050 tons MSW per day (3150 tons per day entire facility), and 438 458 MMBtu per hour. These capacities are not limited by this permit. Instead the nominal capacity is limited to 1050 tons of waste per day per unit, as determined by a 12-month rolling average as determined monthly (see specific condition B.100). Short term capacity is limited only by limiting steam production.***

**(4) On page 25, first paragraph, the net steam energy is listed as 1158 Btu/lb of steam. Good engineering practice dictates that the net steam energy be maximized. The County requests that the 1158 Btu/lb value be cited as a nominal value.**

{Note: Each of the three municipal waste combustors (MWCs) has a maximum capacity of 1050 tons MSW per day and ~~438~~ **458** MMBtu/hr heat input (with MSW having a heating value of 5000 Btu/lb). ***These short-term capacities are not limited by this permit.*** Short-term capacity is limited ***only*** by limiting steam production, which effectively limits heat input. The maximum steam production rate is ~~250,000~~ **275,000** lbs/hr (determined by a 4-hour block average). ***The design net enthalpy at MCR is nominally 1158 Btu/lb of steam*** (the net steam energy may be calculated as the difference in enthalpy between the steam at the superheater outlet and the feedwater at the inlet). }

**(5) On page 25, third paragraph, the description of the steam supply to the turbines should be revised to allow the use of steam from any of the Units to be used in either turbine. Also the stack characteristics for Units 1 and 2 should reflect retrofit conditions.**

**Clarifications, Draft Permit No.: 1030017-002-AV  
Pinellas County, Florida**

Units 1 and 2 began commercial operation May 8, 1983; Unit 3 began commercial operation August 1, 1986. Units 1 and 2 share a common stack and turbine. Stack height = 161 feet, exit diameter = 10.0 feet, exit temperature = 540°F, actual volumetric flow rate = 680000 acfm. Unit 3 has a separate stack and turbine. Stack height = 165 feet, exit diameter = 8.5 feet, exit temperature = 270 °F, actual volumetric flow rate = 243117 acfm. Following retrofit, all three units will exhaust to a common stack consisting of three separate flues. The generation equipment and configuration will not change. Units 1 and 2 will still provide steam to the existing #1 steam turbine and Unit 3 will provide steam to the existing #2 steam turbine. *The existing generation equipment will be maintained and operated such that the existing three (3) steam generating units supply the existing two (2) T/G sets which have a combined electrical output of 75MW.*"

(6) Unit No.1 will not burn fossil-fuel (natural gas) until after completion of the retrofit, therefore, we question the value of including Conditions A.62 on p. 23 and A.67 on p. 24 for existing units. Conditions A.62 and A.67 are not applicable to Pinellas County and should be deleted. Also, the auxiliary burners can be removed from the top of page 7 and Condition A.9.(7) can be deleted.

~~A.62. Monthly records shall be maintained of the amount of natural gas used by the auxiliary burners of each MSW unit and the equivalent heat input from natural gas (calculated using the heat value for natural gas provided by the natural gas supplier). [Rule 62-213.440, F.A.C.]~~

~~A.67. Acid Rain Part Application. For any unit which was a solid waste incinerator, burning less than 20 percent fossil fuel as described in 40 CFR 72.6(b)(7), adopted and incorporated by reference at Rule 62-204.800, F.A.C. the designated representative of the source containing the unit shall submit a complete Acid Rain Part application governing such unit to the Department before the later of January 1, 1998, or March 1 of the year following the three calendar year period in which the incinerator consumed 20 percent or more fossil fuel on a British thermal unit (BTU) basis. [Rule 62-214.320(1)(h), F.A.C.]~~

(7) Condition B.99 on p. 61 requires the facility to track monthly natural gas usage. It should be noted that this requirement has nothing to do with the NSPS Subpart Db exemption (limiting fossil-fuel to 10% or less of nominal total gross heat input) from NO<sub>x</sub> emission limits because the units are not subject to NSPS Subpart Db (construction on all units commenced prior to June 19, 1984 and the retrofits were not modifications for NSPS purposes). Condition B.99 is not applicable to Pinellas County and should be deleted



**Clarifications, Draft Permit No.: 1030017-002-AV  
Pinellas County, Florida**

~~B.99. Monthly records shall be maintained of the amount of natural gas used by the auxiliary burners of each MSW unit and the equivalent heat input from natural gas (calculated using the heat value for natural gas provided by the natural gas supplier). [Rule 62-213.440, F.A.C.]~~

**(8) 40 CFR 61 Subpart C is not applicable to any of the units because the MWCs do not accept beryllium-containing wastes generated by any of the regulated source categories (extraction plants, ceramic plants, foundries, and propellant plants which process beryllium or beryllium compounds). Accordingly the Permitting notes on page 26 should be revised and Conditions B.38., and B.39. Should be deleted.**

{Permitting notes. These emissions units are regulated under NSPS - 40 CFR 60, Subpart Cb, Emissions Guidelines and Compliance Times for Large Municipal Waste Combustors That Are Constructed on or Before September 20, 1994, adopted and incorporated by reference, subject to provisions, in Rule 62-204.800(8)(b), F.A.C.; NSPS - 40 CFR 60, Subpart E, Standards of Performance for Incinerators, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; Rule 62-212.400(5), F.A.C., Prevention of Significant Deterioration (PSD) (PSD-FL-011(A) for Units 1 & 2; PSD FL-098(A) for Unit 3); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT); Rule 62-296.401(2), F.A.C., Incinerators; Rule 62-296.416, F.A.C., Waste-to-Energy Facilities; and, PA 78-11 & 83-18 (A, B, & C). ~~Unit 3 is also regulated under NESHAP - 40 CFR 61, Subpart C, NESHAP for Beryllium, adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.~~ Also, please note that conditions in 40 CFR 60, Subpart Cb, are contained in 40 CFR 60, Subpart Eb. }

**Beryllium**

**B.37.**

~~{Permitting Note Meeting the PSD-FL-098(A) beryllium emissions limit ensures compliance with the beryllium NESHAP. }~~

~~[PSD-FL-098(A)]~~

~~**B.38. Emissions to the atmosphere from stationary sources subject to the provisions of 40 CFR 61 Subpart C (Unit 3) shall not exceed 10 grams of beryllium over a 24-hour period, except as provided in paragraph (b) of this section.**~~

~~[40 CFR 61.32(a)]~~

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~~B.39. The burning of beryllium and/or beryllium-containing waste, except propellants, is prohibited except in incinerators, emissions from which must comply with the standard in 40 CFR 61.32.~~

~~[40 CFR 61.32(c)]~~

**(9) The phrase "from Unit 3" should be dropped from Condition B.6 on p. 27.**

**B.6.** The permittee shall have installed, shall continuously operate, and shall maintain a particulate emission control device for the control of particulates from Unit 3 [PSD-FL-098]

**(10) Condition B.9(b) on p. 27 describes the method by which to determine whether a unit is a large or small MWC (greater than or less than 250 tpd) for regulation under Subpart Eb or Subpart Cb. Since the Pinellas County units are large MWC units, Condition B.9(b) should be replaced as shown below.**

**B.9. Capacity.**

~~(b) The procedures specified in paragraphs (1) and (2) shall be used for calculating municipal waste combustor unit capacity as defined under 40 CFR 60.51b.~~

~~(1) For municipal waste combustor units capable of combusting municipal solid waste continuously for a 24-hour period, municipal waste combustor unit capacity shall be calculated based on 24 hours of operation at the maximum charging rate. The maximum charging rate shall be determined as specified in paragraphs (i) and (ii) as applicable.~~

~~(i) For combustors that are designed based on heat capacity, the maximum charging rate shall be calculated based on the maximum design heat input capacity of the unit and a heating value of 12,800 kilojoules per kilogram for combustors firing refuse-derived fuel and a heating value of 10,500 kilojoules per kilogram for combustors firing municipal solid waste that is not refuse-derived fuel.~~

~~(ii) For combustors that are not designed based on heat capacity, the maximum charging rate shall be the maximum design charging rate.~~

~~(2) For batch feed municipal waste combustor units, municipal waste combustor unit capacity shall be calculated as the maximum design amount of municipal solid waste that can be charged per batch multiplied by the maximum number of batches that could be processed in a 24-hour period. The maximum number of batches that could be processed in a 24-hour period is calculated as 24 hours divided by the design number of hours required to process one batch of municipal solid waste, and may include fractional batches (e.g., if one batch requires 16 hours, then 24/16, or 1.5 batches, could be combusted in a 24-hour~~

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~~period) For batch combustors that are designed based on heat capacity, the design heating value of 12,800 kilojoules per kilogram for combustors firing refuse-derived fuel and a heating value of 10,500 kilojoules per kilogram for combustors firing municipal solid waste that is not refuse-derived fuel shall be used in calculating the municipal waste combustor unit capacity.~~

[40 CFR 60.31b and 40 CFR 60.58b(j); Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, PA 78-11(B) & PA 83-18(B)]

***B.9.(b) Each of the three MWC units are large MWCs for the purpose of regulation under 40 CFR 60.51b.***

**(11) Condition B.17 on p. 30 should be revised to reflect the actual configuration of the facility – i.e., the end of part (1), beginning with “for all types”, and all of part (2) should be deleted.**

**B.17. Operating Requirements.** The procedures specified in paragraphs (1) through (12) shall be used for determining compliance with the operating requirements under 40 CFR 60.53b.

(1) Compliance with the carbon monoxide emission limits in 40 CFR 60.53b(a) shall be determined using a 4-hour block arithmetic average ~~for all types of affected facilities except mass burn rotary waterwall municipal waste combustors and refuse-derived fuel stokers.~~

~~(2) For affected mass burn rotary waterwall municipal waste combustors and refuse-derived fuel stokers, compliance with the carbon monoxide emission limits in 40 CFR 60.53b(a) shall be determined using a 24-hour daily arithmetic average.~~

**(12) Condition B.43 on page 37 should be revised to be consistent with language, intent and requirements of the Emission Guidelines as follows.**

**B.43. Startup, Shutdown and Malfunction.** The provisions for startup, shutdown, and malfunction are provided in paragraphs (1) and (2).

(1) ~~Except as provided by 40 CFR 60.56b, the~~ ***The*** standards under 40 CFR 60, Subpart ~~Eb~~ ***Cb*** apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup, shutdown or malfunction periods are limited to 3 hours per occurrence.

**(13) In Condition B.44 on p. 38 of the draft permit (and any other applicable locations in the draft permit), Pinellas County requests that the period of allowable excess emissions under FAC 62-210.700 be authorized by the Department for three hours (rather than two hours in**

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**any 24 hour period) consistent with EPA's determination in the MWC regulations that 3 hours is necessary for startup and shutdown of MWCs. Further, the draft permit should expressly state that excess emission measured during startup, shutdown and malfunctions shall not be considered when determining compliance with emission limits. See Comment 15.**

**B.44.** Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed ~~two~~ **three** hours in any 24-hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.; and PSD FL-098(A)]

**(14) At Condition B.57(5)(iii) on pp. 44 and 45 of the draft permit (and other locations, if any), the emission limit allowing the alternative testing schedule for dioxins/furans should be corrected to 15 ng/dscm at 7% O<sub>2</sub>, consistent with Subpart Cb at 40 CFR 60.38b(b). The value of 7 ng/dscm currently listed at four locations in this draft permit condition is the NSPS requirement, which is not applicable.**

**B.57.** The procedures and test methods specified in paragraphs (1) through (9) shall be used to determine compliance with the limits for dioxin/furan emissions.

(iii) Where all performance tests over a 2-year period indicate that dioxin/furan emissions are less than or equal to ~~7~~ **15** nanograms per dry standard cubic meter (total mass) **at 7% O<sub>2</sub>**, for all affected facilities located within a municipal waste combustor plant, the owner or operator of the municipal waste combustor plant may elect to conduct annual performance tests for one affected facility (i.e., unit) per year at the municipal waste combustor plant. At a minimum, a performance test for dioxin/furan emissions shall be conducted annually (no more than 12 months following the previous performance test) for one affected facility at the municipal waste combustor plant. Each year a different affected facility at the municipal waste combustor plant shall be tested, and the affected facilities at the plant shall be tested in sequence (e.g., Unit 1, Unit 2, Unit 3, as applicable). If each annual performance test continues to indicate a dioxin/furan emission level less than or equal to ~~7~~ **15** nanograms per dry standard cubic meter (total mass) **at 7% O<sub>2</sub>**, the owner or operator may continue conducting a performance test on only one affected facility per year. If any annual performance test indicates a dioxin/furan emission level greater than ~~7~~ **15** nanograms per dry standard cubic meter (total mass) **at 7% O<sub>2</sub>**, performance tests thereafter shall be conducted annually on all affected facilities at the plant until and unless all annual performance tests for all affected facilities at the plant over a 2-year period indicate a dioxin/furan emission level less than or equal to ~~7~~ **15** nanograms per dry standard cubic meter (total mass) **at 7% O<sub>2</sub>**.

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(15) Condition B.97 on p. 60 excluding startup, shutdown, and malfunction periods from compliance averaging periods is applicable as written only to Unit 3. Since this exclusion should apply to all units after retrofits, the phrase "For Unit 3," should be removed. Further, the draft permit should expressly state that excess emission measured during startup, shutdown and malfunctions shall not be considered when determining compliance with emission limits.

~~B.97. For Unit 3, CEM data recorded during periods of startup, shutdown, and malfunction shall be reported but excluded from compliance averaging periods for carbon monoxide and opacity.~~ *all parameters monitored by the CEMS.*  
[PSD-FL-098(A)]

(16) Condition C.16 on p. 66 waives PM stack test requirements only for the minor particulate sources equipped with a baghouse. In the 1995 construction permit application, Pinellas County requested that the Method 5 test be waived for the minor particulate sources equipped with scrubbers as well (being functionally equivalent to baghouses). This request was granted, as reflected in the revised PPSA Conditions of Certification. The final permit should be revised as shown below to be consistent with the current permit requirements.

~~C.16. Particulate Matter Emissions – storage silos (E.U. ID Nos. 004, 005, 006, 007, and 008). In the case of an emissions unit which has the potential to emit less than 100 tons per year of particulate matter and is equipped with a baghouse.~~ The Department waives any particulate matter compliance test requirements for *these* emissions units specified in any otherwise applicable rule, and specifies an alternative standard of 5% opacity.  
If the Department has reason to believe that the particulate weight emission standard applicable to such an emissions unit (see specific condition C.6.) is not being met, it shall require that compliance be demonstrated by the test method specified in the applicable rule (see specific condition C.15.).  
[Rule 62-297.620(4), F.A.C.; AC52-259351; and, PA 78-11(B,C) & PA 83-18(B,C)]

(17) For the minor particulate sources, Condition C.8. on page 65 of the draft permit lists a visible emissions limit of 5%. This is inconsistent with AO52-268853 for the hydrated lime silo and the PPSA Conditions of Certification for the lime and carbon silo dust collectors and the MRS/ACB scrubbers, which list 5% as an "alternative" standard to the gr/dscf emission limits. The PPSA Conditions of Certification go on to state that "A visible emission reading greater than 5% opacity does not create a presumption that the emission limit (i.e., in gr/dscf) is being violated, but would require the permittee to perform a particulate stack test in accordance with EPA Methods contained in 40 CFR 60, Appendix A." This language was included in the

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**Chapter III, Section D, Part 10 forms submitted in March 1999 for these sources. Therefore, this section of the draft permit should be revised as follows.**

**C.8. Visible Emissions.** Visible emissions from each emissions unit shall not exceed *an alternative emissions limit of 5% opacity. A visible emission reading greater than 5% opacity does not create a presumption that the actual emission limit (i.e., in gr/dscf) is being violated, but may require the permittee to perform a particulate stack test in accordance with Conditions C.15. And C.16.*

[AC52-259351(E.U. ID No. 004); and, Rules 62-297.620(4) (E.U. ID Nos. 004, 006, 007) and 62-296.711(2) (E.U. ID Nos. 005 and 008), F.A.C.]

**(18) In Appendix I-1, List of Insignificant Emissions Units/Activities, the Urea Storage Tank is given as 2,000 gallons. The actual name plate size of the tank is 25,000 gallons. In addition, a 100 gallon diesel storage tank and a 250 gallon waste gasoline tank should be added to the list.**

Brief Description of Emissions Units and/or Activities:

**RESOURCE RECOVERY FACILITY AREA**

1. 500 & 250 Gallon Diesel Oil Storage Tanks.
2. 250 Gallon Unleaded Gasoline Storage Tank.
3. 250 Gallon Hydraulic Oil Storage Tank.
4. (2) 2000 Gallon Turbine Oil Storage Tanks .
5. 2000 Gallon Turbine Oil Collection Tank.
6. Welding Station Vent in Maintenance Building
7. 20,000 & 7800 Gallon Phosphoric Acid Storage Tanks.
8. 5200 Gallon Caustic Storage Tank.
9. 5200 & 5000 Gallon Sulfuric Acid Storage Tanks.
10. 8000 Gallon Sodium Carbonate Storage Tank.
11. **25,000** Gallon Urea Storage Tank .
12. (5) 1-ton Chlorine Cylinders.

**LANDFILL, MULCHING, AND OTHER AREAS AT THE PINELLAS COUNTY COMPLEX**

1. 500 Gallon Diesel Oil Storage Tank at Chlorine Treatment Area
2. 500 Gallon In-ground Diesel Oil Storage Tank at Scale Station
3. 12,000 Gallon In-ground Gasoline Storage Tank at Mosquito Control Area.
4. 12,000 Gallon In-ground Diesel Storage Tank at Mosquito Control Area.
5. (2) 1000 Gallon Pesticide Storage Tanks.
6. (2) 1000 Gallon Aboveground Diesel Storage Tanks at Landfill Contractor.

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7. 1000 Gallon Waste Oil Storage Tank at Landfill Contractor.
8. 275 Gallon Gasoline Storage Tank at Landfill Contractor.
9. 275 Gallon Oil Storage Tank at Landfill Contractor.
10. 275 Gallon Hydraulic Oil Storage Tank at Landfill Contractor.
11. (7) 1-ton Chlorine Cylinders.
12. *100 Gallon above ground diesel storage tank at Mulch area.*
13. *250 Gallon mixed waste gasoline tank at Landfill Contractor area.*

**(19) Condition B.98.(b) on p. 60 (and any other locations in the draft permit) which require test reports to be submitted within 45 days should be changed to 60 days consistent with the PPSA Conditions of Certification.**

**B.98. Test Reports.**

- (b) The required test report shall be filed with the DEP Southwest District Office as soon as practical but no later than ~~45~~ 60 days after the last sampling run of each test is completed.

**(20) Since Unit 1 and 2 no longer share a common stack, the language in paragraph 2, page 7 should be revised to reflect this.**

Units 1 and 2 began commercial operation May 8, 1983. Particulate matter emissions from *Unit 1 are controlled by an electrostatic precipitator (ESP)*, while CO and NO<sub>x</sub> emissions are controlled by good combustion practices. Following retrofit to comply with NSPS – 40 CFR 60, Subpart Cb, spray dry absorbers (SDA) and baghouses will be used for control of acid gases and particulates, Selective Non-Catalytic Reduction (SNCR) for control of NO<sub>x</sub>, and activated carbon injection systems (ACI) for control of Hg and certain organic emissions. Odor is controlled by drawing combustion air from the refuse tipping area. *Units 1 and 2 share a common turbine. Unit 1 has a separate stack.* (~~Stack height = 161 feet, exit diameter = 10.0 feet, exit temperature = 540 °F, actual volumetric flow rate = 680,000 acfm~~).

**(21) Condition A.9.(3) page 9 and Condition B.13.(3) page 28, should refer to the facility owner and operator.**

The facility *owner or* operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received and used as fuel at the facility, and subject to a percentage weight limitation, below, (5 and 6). For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of

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waste material, as determined by visual observation.

- (22) Condition A.37. page 15 and Condition B.48. page 38, should refer to the plant owner or operator.**

**A.37.** Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant *owner or* operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard. [40 CFR 60.8(c)]

- (23) On page 63 the description of Emissions unit-005 should be revised as follows to reflect the actual recovered material streams.**

Emissions unit -005 is the Metal Recovery System (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. A cyclone/wet scrubber is used to capture the lighter, non-metallic ash fugitives that separate from the ash stream in the MRS and reduce fugitive ash emissions. The MRS is located inside the Ash Storage and Processing Building. This building has 4 roof ventilation fans and an attached conveyor enclosure with 2 roof ventilation fans. Since emissions from the MRS are controlled by the cyclone/wet scrubber and the ash is wetted before conveying and processed and stored in a wet state, no emissions controls are on the Ash Storage and Processing Building. Particulate matter and visible emissions are controlled by a Newell Industries, Inc. cyclone/wet scrubber (Model No. 80104). The scrubber parameters are as follows: stack height = 54 feet; exit diameter = 0.7 feet; exit temperature = 77 °F, actual volumetric flowrate = 40,000 acfm. The initial startup date of the scrubber was November 1, 1989.

- (24) On page 6 the list of reasonable precautions to prevent emissions of uncontrolled particulate matter should be revised to reflect actual operating procedures.**

**8. Not federally enforceable.** Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

**Resource Recovery Facility Area**

- (1) Paving and maintenance of roads and parking areas.



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- (2) Employment of proper dust-control techniques to prevent fugitive dust emissions during construction activities such as demolition of buildings, grading roads, construction, and land clearing (construction to be experienced during facility improvements to air pollution control equipment to meet the Emission Guideline requirements of 40 CFR 60 Subpart Cb).
- (3) ***Sweeping of roads and*** periodic washing of roads and other paved areas to remove particulate matter and to prevent reentrainment, and from buildings or work areas, to prevent particulate from becoming airborne.
- (4) Landscaping or planting of vegetation.
- (5) Wetting of bottom ash and fly ash prior to conveyor systems.
- (6) ***Keeping metal stockpiles damp.***

**Landfill, Mulching, and Other Areas at the Pinellas County Complex**

- (1) Operation of the landfill in accordance with all applicable portions of Chapter 62-7, F.A.C.
- (2) Putrescible wastes receive a daily cover of a six inch layer of compacted earth or other approved material at the end of each day to prevent odors.
- (3) Landscaping or planting of vegetation.
- (4) Sweeping of roads and periodic washing of roads.
- (5) Covering transport vehicles for ash and metals.
- ~~(6) ***Keeping metal stockpiles damp.***~~

[Rule 62-296.320(4)(c)2., F.A.C.; and, Proposed by applicant in initial Title V permit application received June 14, 1996.]

(25) In Table 2-1 the compliance method for EU ID 004, 005, 006, 007, and 008 should be revised as shown in the attached Table 2-1.

**Table 2-1, Summary of Compliance Requirements**

Pinellas County Utilities Administration  
Pinellas County Resource Recovery Facility

**DRAFT Permit No.:** 1030117-002-AV  
**Facility ID No.:** 1030117

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E. U. ID No.	Brief Description	Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date	Min. Compliance Test Duration	CMS <sup>1</sup>	See Permit Condition(s)	
-001	Municipal Solid Waste (MSW) Combustors (250,000 lbs/hr - steam) (1050 TPD - MSW) (438 MMBtu/hour - MSW)	VE	MSW	EPA Method 9	Annually		30 minutes	Yes	B.52.	
-002		VE- Fugitive Ash		EPA Method 22	Annually		1 hour	No	B.35.	
-003		PM	MSW	EPA Method 5	Annually		1 hour	No	B.52.	
		PM <sub>10</sub>								
		CO	MSW	EPA Method 10, 10A, 10B	Daily		1 hour	Yes	B.17.	
		NO <sub>x</sub>	MSW	EPA Method 19	Daily		1 hour	Yes	B.58.	
		SO <sub>2</sub>	MSW	EPA Method 19	Daily		1 hour	Yes	B.55.	
		HCl	MSW	EPA Method 26, 26A	Annually		1 hour	No	B.56.	
		dioxin/furan	MSW	EPA Method 23	Annually <sup>3</sup>		N/A	No	B.57.	
		Cd	MSW	EPA Method 29	Annually		1 hour	No	B.53.	
		Hg	MSW	EPA Method 29	Annually		1 hour	No	B.53., B.54.	
		Pb	MSW	EPA Method 29	Annually		1 hour	No	B.53.	
		Be <sup>2</sup>	MSW	EPA Method 103, 104	Every 5 years		N/A	No	B.61.	
	Fl <sup>2</sup>	MSW	EPA Method 13B	Every 5 years		1 hour	No	B.62.		
-004	Hydrated Lime Storage Silo	VE		EPA Method 9	Annually <sup>5</sup>	15-Feb	30 minutes	No	C.14.	
		PM		EPA Method 5	As Required <sup>4</sup>		1 hour	No	C.15.	
-005	Metal Recovery System (MRS)	VE		EPA Method 9	Annually		30 minutes	No	C.14.	
		PM		EPA Method 5	As Required <sup>4</sup>		1 hour	No	C.15.	
-006	Activated Carbon Storage Silo	VE		EPA Method 9	Annually		30 minutes	No	C.14.	
		PM		EPA Method 5	As Required <sup>4</sup>		1 hour	No	C.15.	
-007	Lime Storage Silo	VE		EPA Method 9	Annually		30 minutes	No	C.14.	
		PM		EPA Method 5	As Required <sup>4</sup>		1 hour	No	C.15.	
-008	Ash Conditioning Building (ACB)	VE		EPA Method 9	Annually		30 minutes	No	C.14.	
		PM		EPA Method 5	As Required <sup>4</sup>		1 hour	No	C.15.	
-009	MSW Landfill	NMOC		EPA Method 18 or 25C	Annually <sup>6</sup>		1 hour	No	D.10.	

**Notes:**

1. CMS [=] continuous monitoring system used for monitoring requirement in lieu of fuel sampling and analysis if marked 'yes'.  
(Acceptable as long as CMS is maintained and calibrated as required.)
2. Applies only to Unit 3.
3. Test at least one unit annually, subject to 40 CFR 60.58b(g) requirements.
4. Particulate matter tests are not required unless visible emissions tests indicate standards *may* have been violated.
5. Within 60 days prior to or on February 15.
6. If Tier II testing is used to determine site-specific NMOC emission rate.