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STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION NOTICE OF FINAL PERMIT

In furtherance of an
Application for Permit by:

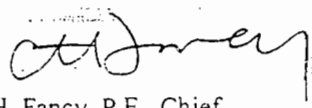
Mr. Pick Talley, Director of Utilities
Pinellas County Utilities
PO Box 1780
Clearwater, Florida 33757

DEP File No. 1030117-003-AC
PSD-FL-011B and PSD-FL-098B
Pinellas County Resource Recovery Facility
Pinellas County

Enclosed is Final Permit Number 1030117-003-AC (PSD-FL-011B and PSD-FL-098B). This permit, which is a modification to PSD permit numbers PSD-FL-011A and PSD-FL-098A, authorizes the applicant, Pinellas County Utilities to construct its Capital Replacement Project for its Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.


C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/21/00 to the person(s) listed:

Pick Talley *
Don Elias, RTP
Bill Thomas, P.E., DEP SW District
Peter Hessling, Pinellas County DEM
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

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)

12/21/00
(Date)



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 14, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Pick Talley
Director of Utilities
Pinellas County Utilities
14 S. Fort Harrison Avenue, 5th Floor
Clearwater, Florida 33756

Re: DEP File No. 1030117-003-AC, PSD-FL-011B and PSD-FL-098B
Modification of PSD Permits PSD-FL-011A and PSD-FL-098A
Pinellas County Resource Recovery Facility

The applicant, Pinellas County Utilities, applied on August 30, 2000, to the Department for a modification to PSD permit numbers PSD-FL-011A and PSD-FL-098A for its Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The modification is to authorize construction of its Capital Replacement Project. The Department has reviewed the modification request. The referenced permits are hereby modified as follows. This modification shall supplement conditions imposed by previous permitting actions.

New Specific Condition:

The owner or operator is authorized to construct its Capital Replacement Project as described in the letter application from Pinellas County Utilities dated August 30, 2000, and subsequent related information. The owner or operator is authorized to perform the construction activities generally described as: boiler refurbishment consisting primarily of replacement of the components from the furnace gas exit to the economizer gas exit for boiler unit trains 1, 2 and 3; rebuilding the refuse cranes; refurbishment of the cooling tower; upgrading the instrumentation control systems; refurbishment or replacement of feedwater pumps; tipping floor improvements; and upgrading the existing water regeneration equipment through the replacement of two nominal 100 gallon per minute demineralizer trains.

The owner or operator shall submit to the Department on an annual basis, for a period of five years representative of normal post-change operations of MWC units 1, 2 and 3 ("the units"), within the period not longer than 10 years following the completion of construction of the last unit, information demonstrating that the Capital Replacement Project did not result in a PSD-significant emissions increase. A PSD-significant increase shall be defined as noted in Table 212.400-2 of Chapter 62-212, F.A.C. The information required above shall be based on a comparison of "baseline" past actual annual emissions with actual annual emissions for the given year after completion of the Capital Replacement Project, shall be reported on a calendar year basis, and shall start the first full calendar year following the completion of the Capital Replacement Project's boiler refurbishment of the last unit. The owner or operator shall utilize the "representative actual annual emissions" methodology, defined at Rule 62-210.200(12)(d), F.A.C., and the provisions of 40 CFR 52.21(b)(33), adopted by state rule, in its demonstration. If the Capital Replacement Project results in a PSD-significant emissions increase, or if the owner or operator fails to submit the required information, the units shall be subject to the requirements of PSD at that future time, which shall include a BACT determination for each PSD-significant pollutant.

The owner or operator shall estimate actual annual emissions using the general methodology shown in its letter application and subsequent related information, as discussed generally as follows. The owner or operator shall use the continuous emission monitoring system (CEMS) data to estimate actual annual emissions of the

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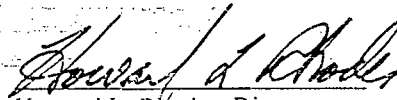
pollutants monitored by the CEMS: NO_x, SO₂, and CO. The owner or operator shall use data from all post-retrofit compliance test(s) to estimate past actual annual emissions of other pollutants not monitored by the CEMS: PM/PM₁₀, lead, mercury, dioxins, hydrogen chloride. The owner or operator shall use the CEMS data to determine unit availability, which shall be used in determining actual annual emissions. The owner or operator shall use the CEMS data starting from June 1, 2000 until the start of construction of the Capital Replacement Project's boiler refurbishment for its determination of baseline past actual annual emissions. No more than two years of data shall be used to determine the baseline past actual annual emissions. As an alternative to the above, the owner or operator may use other methods approved by the Department.

[Rule 62-4.070(3) and 62-212.300(1)(d), F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/21/00 to the person(s) listed:

Pick Talley *
Don Elias, RTP
Bill Thomas, P.E., DEP SW District
Peter Hessling, Pinellas County DEM
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

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

Charlotta J. Hays 12/21/00
(Clerk) (Date)

TECHNICAL EVALUATION AND DETERMINATION

1 APPLICANT NAME AND ADDRESS

Pinellas County Utilities
14 S. Fort Harrison Avenue, 5th Floor
Clearwater, Florida 33756

Authorized Representative: Mr. Pick Talley, Director of Utilities

2 REVIEWING AND PROCESS SCHEDULE

September 1, 2000	Received letter application for permit modification
September 20, 2000	Received permit application fee
September 25, 2000	Received additional information
October 6, 2000	Received additional information by fax (original received October 11)
October 12, 2000	Received additional information
October 17, 2000	Received revised information
October 20, 2000	Received additional information by fax (original received October 23)
October 20, 2000	Application complete (for purposes of review time clock)
November 2, 2000	Distributed Notice of Intent to Issue and supporting documents
November 10, 2000	Notice of Intent published in the St. Petersburg Times

3 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

This existing Pinellas County Resource Recovery Facility has three municipal waste combustor units ("units") that burn municipal solid waste (MSW) and certain other solid wastes to produce steam used to make electricity via steam turbine generators. All three municipal waste combustor units are mass burn water wall boilers with auxiliary natural gas-fired burners, and each has a nominal design rate capacity of 1000 tons of MSW per day, 417 mmBtu per hour, and 250,000 pounds steam per hour (assuming MSW with a heating value of 5000 Btu per pound). Units 1 and 2 began commercial operation in May 1983 and unit 3 began commercial operation in August 1986. The total nominal electric generating capacity of the facility is 75 MW from two steam turbine/generator sets, and the power is supplied to Florida Power Corporation pursuant to contract. The facility includes other emissions units related to operation of the facility, and a contiguous municipal solid waste landfill. The facility is located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The facility's units were originally permitted under the federal PSD program (PSD-FL-011 permitted units 1 and 2 and PSD-FL-098 permitted unit 3). The facility was also certified under Florida's Power Plant Siting Act, under orders PA78-11 and PA83-18, and their respective modified orders.

The units are subject to the requirements of Rule 62-204.800(8)(b), F.A.C., and 40 CFR 60 Subpart Cb, the emission guidelines for "existing" large municipal waste combustors. The units were recently retrofitted with new combustion controls and advanced pollution control equipment to meet the emission requirements of this subpart. These requirements were more stringent than the requirements imposed on these units by previous PSD permits. Retrofit construction and initial compliance testing were completed in late 1998 for unit 3, summer 1999 for unit 2 and early 2000 for unit 1. Retrofit construction activities were authorized by an amendment to the PSD permits for the facility, denoted as PSD-FL-011A and PSD-FL-098A.

The applicant applied for a modification of its PSD permits to allow construction of its Capital Replacement Project. The applicant proposed in this project to construct facility improvements that are intended to allow the facility to operate at capacity throughout the useful life of the upgraded emission controls installed during the Subpart Cb retrofit noted above. In essence, this is a life extension project. [Information provided by applicant at a pre-application meeting with the Department July 7, 2000.] The present project will be processed as a PSD permit modification denoted as PSD-FL-011B and PSD-FL-098B.

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The Capital Replacement Project includes improvements throughout the facility: refurbishment of the boilers, cranes, cooling towers and feedwater pumps, upgrades of the instrumentation and controls, replacement of the water treatment system and tipping floor improvements. Of particular importance to this permitting action are the Capital Replacement Project's changes related to boiler refurbishment. All three municipal waste combustor unit boilers are proposed for refurbishment, so the emissions units addressed by this permitting action are:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Municipal waste combustor unit 1
002	Municipal waste combustor unit 2
003	Municipal waste combustor unit 3

The applicant stated that the units are "electric utility steam generating units" as defined at 40 CFR 52.21(b)(31) and Rule 62-210.200(109), F.A.C., and so the applicant proposed that the facility may use the "representative actual annual emissions" methodology specified at 40 CFR 52.21(b)(33) and Rule 62-210.200(12)(d), F.A.C., to confirm that the project is not subject to the PSD requirements of 40 CFR Part 52 and Rule 62-212.400, F.A.C. Because Florida has a delegated PSD program for sources subject to the Power Plant Siting Act, the analysis of PSD applicability is to be done in accordance with federal rules, particularly 40 CFR 52.21, and the Department may rely explicitly on EPA's interpretation of its rules. The Department can also rely on its rules provided it does so in a manner that is consistent with EPA's program. In reviewing this proposed project, the Department needed to determine whether the applicant's units are electric utility steam generating units, and, if so, if the applicant has met the requirements for the representative actual annual emissions methodology.

The first issue is whether the units are electric utility steam generating units. It should be noted that the Department's present review of whether the units are electric utility steam generating units is for purposes of determining PSD applicability, not the applicability of any NSPS requirement for such units. A plain reading of the definitions noted above appears to confirm the applicant's assertion that the units meet the definition. The units are steam electric generating units which are intended to supply more than one third of the potential electrical output and more than 25 MW electrical output to a utility power distribution system for sale. However, the definitions state that the units must have been constructed for the purpose of supplying that electricity. A municipal waste combustion facility that produces steam to drive an steam turbine electrical generator, such as the applicant's facility, is arguably constructed with more than one purpose, to supply electricity and to combust solid waste (reduce its volume prior to ultimate disposal). It may not be possible to distinguish which purpose is more important as it is conceivable that the facility may not have been constructed unless revenue would be received both from the receipt of solid waste and the sale of electricity. The definitions do not exclude additional "purposes" for the units, and so do not limit consideration to only units that serve the sole purpose of supplying electricity.

EPA has not explicitly written regarding whether MWC units that use steam to generate electricity are electric utility steam generating units. EPA's interpretive rule for case-by-case MACT applicability published May 25, 2000, briefly discusses electric utility steam generating units, for a different purpose than PSD applicability. EPA actually considered this issue within the broader context of determining that combustion turbines are not electric utility steam generating units, even if they are part of a combined cycle system. EPA stated that waste heat recovery units, including duct burners, which are part of a combined cycle system are considered to be steam generating units. In making this assessment EPA relied upon the distinction that steam generating units use steam derived from the combustion of fuel to drive a "steam turbine, which in turn provides shaft power to spin an electric generator and generate electricity." [65 FR 34011.] EPA distinguished this type of electric generator from that of a turbine generator, which uses fuel to directly drive a mechanically coupled electric generator. Clearly, then, EPA

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considers a steam generating unit to be an electrical generator that is driven by extracting energy from steam.

EPA limits the definition of electric utility steam generating units to those units with a minimum generating capacity, which can only be accomplished with a steam generator of a given size and inlet energy requirements, but the definition does not limit the type of boiler or fuels used to create the steam. The term "electric utility" implies that not all types of industrial or commercial facilities are included in the definitions, but the applicant's MWC units, which use steam to generate electricity for sale, appear to meet the definition. Considering the applicant's MWC units to be electric utility steam generating units seems consistent with EPA's published intent regarding the 1992 changes to the PSD program (the so called "WEPCO rule"). In the preamble to these changes, and in its discussion of Alternatives for New Source Review Applicability (part of the so called "new source review reform" proposal), EPA identified the broad criteria used to support the "representative actual annual emissions" methodology for electric utilities. (The methodology is discussed further below.) Generally, in 1992 EPA stated that it was comfortable with the 1992 changes applying to electric utilities because the source population was relatively small, the technology in use relatively uniform, public information would be available to NSR permitting authorities to help confirm future operating conditions, and federal acid rain rules required continuous monitoring or other highly accurate methods for reporting actual emissions. [57 FR 32333.] Clearly, large MWC facilities such as the applicant's, conform with this intent. Although not subject to the acid rain rules, the requirements of 40 CFR 60 Subparts Cb and Eb compel the sources to install continuous monitoring systems and perform accurate emission tests to determine actual emissions. The source population is small, with relatively uniform combustion and control technologies, especially after the implementation of Subparts Cb and Eb. EPA has recently revisited its prior analysis, in light of its belief that changes to utilities are not being reported to permitting authorities. [63 FR 39861.] In its discussion, EPA has additionally noted that electric utilities generally serve a clearly defined local market area. [63 FR 39860.] Although EPA probably intended this to refer to electric service, the applicant's facility also serves a clearly defined local area for receipt and disposal of solid waste. This analogy is important because it is a measure of the applicant's ability to forecast demand growth and future utilization of its units, and is a consideration of the permitting agency when relying on the applicant's projections. (This consideration should not be construed to broaden the scope of the applicability of the WEPCO rule beyond electric utility steam generating units to any commercial or industrial source. EPA has explicit concerns with considering forecasted demand growth in a competitive market economy. [See, for example 63 FR 39861.] The applicant's facility is municipally owned, and its projection of demand is strongly tied to its need to service the limited area of Pinellas County.) The applicant's electrical service is even more limited because it is contracted to sell its net power to one customer, Florida Power Corporation. The facility has been operated to maximize its unit availability, as evidenced by the facility's annual operation reports. As with investor owned electric utilities, public information is available to help confirm the applicant's projection of future demand and utilization, particularly with regard to demand for solid waste disposal. Solid waste reporting is required for each county by the Department's solid waste rules. Population growth data, which will have the major influence on the future demand for solid waste disposal capacity at municipally owned facilities such as the applicant's, is available from sources such as the University of Florida's Bureau of Economic and Business Research. Considering the applicant's units to be electric utility steam generating units appears to be consistent with EPA's intent regarding the WEPCO rule, and the Department considers these units to electric utility steam generating units for purposes of PSD applicability.

Because the units are electric utility steam generating units, the applicant is allowed to use the "representative actual annual emissions" methodology specified at Rule 62-210.200(12)(d), F.A.C., to confirm that the project is not subject to the PSD requirements of Rule 62-212.400, F.A.C. The second issue is whether the applicant has met the requirements for this methodology. This methodology requires

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the applicant to compare actual annual emissions prior to the modification with the annual emissions projected for the two year period following the modification. EPA has written about the representative actual annual emissions methodology in both the preamble to the 1992 changes to the PSD program at 57 FR 32323-6, and in EPA Region 5's May 23, 2000 determination of PSD applicability for Detroit Edison's Dense Pack project.

As noted in the Dense Pack determination, the determination of PSD applicability is a two step process. First, the project must be a physical or operational change that is not excluded from PSD review as routine maintenance, repair or replacement of component parts. This provision is included in Florida's rules under the definition of "modification" at Rule 62-210.200(188), F.A.C., although that definition is not limited to PSD projects. The applicant has not suggested that this project in any way meets that exclusion. The project is a modification as defined by Department rule. Second, the project must result in a PSD-significant increase in emissions. The Department's rules refer to an increase in "actual emissions", which are defined at Rule 62-210.200(12)(d), F.A.C., which, as noted above, provides for the representative actual annual emissions methodology for electric utility steam generating units. Detroit Edison's Dense Pack project is similar to the applicant's project in that both projects are non-routine physical changes that are projected by the source owner to not result in post-change PSD significant emissions increases. In its review of the Dense Pack project, EPA Region 5 concluded that Detroit Edison may "lawfully avoid the major source permitting process by using the unit's representative actual annual emissions to calculate emissions following the change if the source submits information for 5 years following the change to confirm its pre-change projection." [Letter from EPA Region 5 Administrator to Detroit Edison, May 23, 2000.] This is very similar to what EPA wrote in the Federal Register that "any utility which utilizes the 'representative actual annual emissions' methodology to determine that it is not subject to NSR must submit for 5 years after the change sufficient records to determine if the change results in an increase in representative actual annual emissions." [57 FR 32325.] Although the applicant is only required to compare past actual emissions to projected actual emissions for a two year post-change period, the applicant must report post-change emissions for a five year period to confirm its projection. EPA wrote that the additional reporting is a safeguard that future significant actual emissions increases that result from the project will not go unnoticed and unreviewed. [57 FR 32325.] The applicant has proposed that actual emissions will not increase in a PSD significant manner as a result of this project, based on a comparison of past actual to representative future actual annual emissions, and has agreed to the required reporting.

At issue next is the form of any required permit conditions to ensure that the project is not subject to PSD requirements. For sources that are not eligible to use the representative actual annual emissions methodology, the Department would typically provide limits on future potential emissions in any construction permit issued for a modification of an emissions unit. Such limits would be emission limits, which are firm, federally-enforceable limits on future potential emissions. For sources using the representative actual annual emissions methodology, EPA has written that such emission limits are not required. In fact, EPA stated that the only requirement is for "tracking and monitoring post-change utilization and/or emissions levels at the unit to confirm that baseline emission levels are not exceeded as a result of the change." [57 FR 32325.] Although not clear in the cited text, EPA intended that the test be that emissions increases not equal or exceed the PSD significance criteria. EPA wrote that "the intent is to confirm the utility's initial projections rather than annually revisiting the issue of NSR applicability. If however, the reviewing authority determines that the source's emissions have in fact increased significantly over baseline levels as a result of the change, the source would become subject to NSR requirements at that time." [57 FR 32325.] EPA further clarified in the Dense Pack determination that the trigger for PSD review would also include failure to report the required information: "If Detroit Edison fails to comply with the reporting requirements ... it will be required to obtain a PSD permit for the Dense Pack project." [Detroit Edison Applicability Determination Detailed Analysis, undated]

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(presumably May 23, 2000).] Thus, the requirement to track and report actual emissions is an "applicability requirement" rather than an emission limit.

Another issue to be considered is that certain emission increases, those not caused by the change, are not included in the future actual emissions. EPA referred to this as the "causation provision" in the 1992 preamble, where EPA wrote, "where projected increased operations are in response to an independent factor, such as demand growth, which would have occurred ... even in the absence of the physical or operational change, the increased operations ... may be excluded from the projection of the unit's future actual emissions." [57 FR 32327.] As noted in the Dense Pack determination, "[i]n projecting post-change emissions, Detroit Edison does not have to include that portion of the unit's emissions which could have been accommodated before the change and is unrelated to the change, such as demand growth." [Letter from EPA Region 5 Administrator to Detroit Edison, May 23, 2000.] EPA did clarify that increased emissions resulting from efficiency improvements that occur directly because of the project that cause the unit(s) to be utilized more, are not to be excluded from actual emissions: "If efficiency improvements are the predominant cause of the change in emissions and demand growth is not, the exclusion does not apply." [57 FR 32327.] The applicant in this project did not include a projection for demand growth or other independent factors that may increase operations and future emissions. The applicant noted that little demand growth for solid waste disposal is expected beyond the nominal one percent population growth rate that Pinellas County is experiencing. [Discussion with R. Peter Stasis, P.E., of Pinellas County Utilities, pre-application meeting, July 7, 2000.] Independent confirmation of the potential demand growth can be found from the University of Florida's Bureau of Economic and Business Research, which has noted that Pinellas has the fifth largest population in Florida, and its potential for growth is leveling out. [UF Bureau of Economic and Business Research, www.napa.ufl.edu/99news/pop99.htm] The university's 1997-forecasted population for Pinellas County is 905,933 in 2000 and 1,018,919 in 2020, an annual growth rate of less than 1%. [www.napa.ufl.edu/98news/populati.htm#table] The region served by Florida Power Corporation, which receives the electric power from the applicant, is growing at a faster average rate, so demand growth for electric power may be a factor. [ibid.] The applicant is entitled to exclude any actual emissions increase attributable to factors independent of the project, but the applicant must support such exclusion in its future reports. The applicant has not represented that the current project will increase utilization of the units, in and of itself.

The recently completed Subpart Cb retrofit changes are expected to reduce actual emissions from the units (substantially for many pollutants such as dioxin and acid gases) as compared to emissions prior to the retrofit. Because of this, the Department required that the applicant use actual emissions after completion of the retrofit changes for the purposes of determining PSD applicability to this project. The applicant proposed to use the continuous emission monitoring system (CEMS) data to estimate actual annual emissions of the pollutants monitored by the CEMS: NO_x, SO₂, and CO. The applicant proposed to use data from all post-retrofit compliance test(s) to estimate actual annual emissions of other pollutants not monitored by the CEMS: PM/PM₁₀, lead, mercury, dioxins, hydrogen chloride. The CEMS data will also be used to determine unit availability, which is a factor the applicant will use in making its actual annual emissions estimates. The applicant proposed to use the CEMS data starting from June 1, 2000 until the start of construction of the Capital Replacement Project's boiler refurbishment. The starting date of June 1 was selected by the applicant to provide for sufficient time from completion of the retrofit project for the units to have begun normal operation. The applicant intends to begin construction of the Capital Replacement Project's boiler refurbishment in the fall of 2001. This will provide for twelve or more months of CEMS data, and one or two series of compliance tests, for estimating actual annual emissions. Normally, two years of actual emissions data are required for PSD purposes, but Rule 62-210.200(12)(a), F.A.C., provides for the Department to allow the use of a different time period upon a determination that it is more representative of normal operation of the emissions unit. In this case, where the Department is requiring post Subpart Cb retrofit emissions data, the Department is authorizing the use

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of less than two years of data to determine past actual emissions. The applicant has proposed to use the same methodology to determine future actual emissions following the Capital Replacement Project.

As mentioned above, the CEMS will also be used to document availability of the units. Unit availability is a factor in determining actual emissions. EPA stated that actual emissions should be calculated as the product of hourly emissions and capacity utilization (unit availability). [See, for example, EPA's preamble to the 1992 PSD program changes, 57 FR 32323.] Average availability of the units, determined from the operating hours reported annually by the applicant for 1990 through 1999, was about 81.7%, with a standard deviation of about 4%. The applicant reported that for the period of June 1-July 31, 2000, availability of the units was about 89.8%. It is not surprising that unit availability would increase as a result of the Subpart Cb retrofit project. The units date from the early- to mid-1980s. The units were equipped with combustion controls and electrostatic precipitators that were placed in service when the units were first constructed. The applicant reported that operational problems with the ESPs, such as transient field failures, increased as the units aged. [Telephone call with Don Elias, October 19, 2000.] The retrofit project included a new distributive control system that allowed for quicker response to changes in operating parameters, as well as new advanced emission control equipment, including baghouses which replaced the ESPs. These modernized facilities will allow the units to operate in a more stable manner, with less transient failures, with longer periods of time between planned outages. The averaging period proposed by the applicant will be long enough to include planned outage periods. The applicant expects that with the longer averaging time, unit availability will fall somewhat from 89.8% to about 86%, and the Department does not find fault with this assessment. [Memo from Don Elias, October 19, 2000.]

The applicant did provide a "baseline" estimate of actual emissions and a projection of future actual emissions based on the CEMS data available from June 1 through July 31, 2000. As discussed above, the applicant will revise this estimate based on the complete data available from June 1 until the start of construction of the Capital Replacement Project's boiler refurbishment, to provide for the longest possible period for gathering representative data. At that time, the applicant will also revise its estimate of representative future actual annual emissions. The applicant estimated that any emissions increases associated with this project will not exceed the PSD significance criteria. Based on the limited data to date, emissions are estimated by the applicant as follows in tons per year (TPY):

Pollutant	Current Actual Emissions ¹ (TPY)	Rep. Future Actual Emissions (TPY)	Net Increase (TPY)	PSD Significance (TPY)	Subject to PSD?
PM/PM ₁₀	47	71/61	24/14	25/15	No
SO ₂	85	124	39	40	No
NO _x	1691	1730	39	40	No
CO	118	217	99	100	No
Pb	0.25	0.84	0.59	0.6	No
Hg	0.23	0.32	0.09	0.1	No
MWC Organics Total PCDD/F	9.8 x 10 ⁻⁵	10.1 x 10 ⁻⁵	3.0 x 10 ⁻⁶	3.5 x 10 ⁻⁶	No
MWC Acid Gases HCl & SO ₂	239	278	39	40	No

¹ Current actual emissions are after completion of the Subpart Cb retrofit construction. Representative future actual emissions are estimated for the two years following completion of the Capital Replacement Project's boiler refurbishment construction.

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In summary, the applicant's proposed Capital Replacement Project is a non-routine physical change that is a modification as defined by Department rule. Because the affected emissions units are electric utility steam generating units, the applicant may lawfully avoid PSD preconstruction review by using the unit's representative actual annual emissions to calculate emissions following the modification. The Department has determined that past actual emissions in this case will be the post-Subpart Cb retrofit emissions. The applicant contends that representative actual annual emissions following the Capital Replacement Project will not be significantly greater than its past actual emissions. Therefore, the applicant may avoid major PSD permitting to the extent it documents its actual emissions and submits information following the modification to confirm its projection.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM₁₀, carbon monoxide, SO₂, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). At this facility potential emissions of PM/PM₁₀, NO_x, SO₂, CO and VOC exceed 100 TPY.

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). As noted above, the applicant has proposed that the net increase in emissions of PM/PM₁₀, NO_x, SO₂, CO, VOC, MWC metals, MWC organics and MWC acid gases will not exceed the PSD significance levels of Table 212.400-2, F.A.C. Therefore this project is not subject to PSD requirements of Rule 62-212.400, F.A.C., for these pollutants.

40 CFR 60.14 defines a modification for purposes of federal New Source Performance Standards to include a change to an existing facility that increases the emission rate of any pollutant, where such rate is defined by that section to be in units of kg/hour. The Capital Replacement Project is not intended to increase the physical capacity of the emissions units, and so will not result in an increase in the short-term emission rates of any pollutant from the emissions units. Therefore, the project is not a modification as defined by the federal rules. The Capital Replacement Project does not constitute a reconstruction project as defined at 40 CFR 60.15 because the capital cost for the regulated portions of the MWC units of \$35 million does not exceed 50% of the fixed capital cost of a new facility, which are estimated to be \$290 million for the portions of the MWC units regulated by the NSPS Subpart Eb. The applicant also estimated total maintenance costs, excluding costs associated with the Subpart Cb retrofit, for the regulated portions of the MWC units over the life of the facility at \$31.5 million. When these costs are added to the costs of this project, the total costs are 23% of the comparable new construction costs, still less than half of the value that is considered reconstruction per federal rule. (All figures are in year 2000 dollars.) Thus, this project is not subject to any federal New Source Performance Standard.

This project is not subject to any unit specific requirements under state rule. The applicant is required to obtain this permit modification for this project because it is a modification as defined by Rule 62-210.200(188), F.A.C., and construction permits are required for modifications pursuant to Rules 62-4.030, 62-210.300(1)(a) and 62-212.300(1)(a), F.A.C.

4 SOURCE IMPACT ANALYSIS

An impact analysis was not required for this project because it is not subject to the requirements of PSD for PM/PM₁₀, NO_x, SO₂, CO, VOC, MWC metals, MWC organics and MWC acid gases.

TECHNICAL EVALUATION AND DETERMINATION

5 BACT ANALYSIS AND DEPARTMENT'S DETERMINATION

A BACT determination was not required because this project is not subject to the requirements of PSD for PM/PM₁₀, NO_x, SO₂, CO, VOC, MWC metals, MWC organics and MWC acid gases. If the Department determines during the reporting period that the project is subject to PSD, BACT will be required at that time. As is required for any BACT determination, at that time the BACT determination shall not result in allowable emissions that are less stringent than those of the applicable NSPS requirements of 40 CFR 60, Subpart Eb, the NSPS for "new" large municipal waste combustors.

6 EXCESS EMISSIONS

The PSD permit modification for this project will not revise any existing requirements or provisions regarding excess emissions at these units. The Department expects the applicant to include excess emissions, to the extent quantifiable, in its calculation of actual emissions.

7 PRELIMINARY DETERMINATION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department's preliminary determination is to issue the draft permit modification to allow construction of the Capital Replacement Project, subject to the terms and conditions of the draft permit modification.

The permit modification for this project authorizes construction of the Capital Replacement Project, but imposes the record keeping and reporting requirements noted above. As discussed above, these requirements establish an applicability limit, so that if representative future actual emissions increase, or if the applicant fails to comply with the reporting requirements, the applicant will be required to undergo PSD review for the Capital Replacement Project.

8 FINAL DETERMINATION

The Department distributed a public notice package on November 2, 2000. The Public Notice of Intent to Issue was published in the St. Petersburg Times on November 10, 2000. Comments were received from the applicant's consultant in a memorandum dated November 8, 2000. These comments primarily noted minor typographical errors and suggested minor changes to clarify this determination. The Department corrected the typographical errors in this determination and the permit modification identified by the applicant, and made the changes the applicant requested for clarification. These changes are not significant and do not alter any applicable requirement of the permit modification. No comments were received from the public, EPA or federal land manager.

The final action of the Department is to issue the permit with the changes noted above.

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Joseph Kahn, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114



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Fax: (732) 968-9603

August 22, 2001

C. H. Fancy, P.E., Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

AUG 23 2001

BUREAU OF AIR REGULATION

Re: Pinellas County Resource Recovery Facility Capital Replacement Project
PSD Permit PSD-FL-011B and PSD-FL-098B/DEP File No. 1030117-003-AC

Dear Mr. Fancy:

On December 21, 2000, the Department issued a PSD Permit Modification that authorized the construction of the Capital Replacement Project (CRP) at the Pinellas County Resource Recovery Facility (Facility). The CRP was described in detail in the Technical Evaluation and Determination attached to the Department's permit.

With this letter, Pinellas County is formally notifying the Department that CRP construction activities have commenced as of June 1, 2001. The CRP activities require occasional short-term shutdowns of the municipal waste combustor (MWC) units, which would affect facility availability. In the Technical Evaluation and Determination (page 6, second full paragraph), the Department instructed the County to revise the County's estimate of current actual facility emissions upon commencement of CRP construction activities. The estimate was to be performed in a manner consistent with the emissions estimates originally provided to the Department for the two month period of June-July, 2000 (see October 16, 2000 letter from Donald F. Elias to the Department).

Attached please find the revised calculations for the one-year (twelve-month) period from June 2000 through May 2001. The calculations include the most recent stack test data during May 2001. The CEM pollutant emission rates were revised to consider the average flowrate or dioxin stack tests for immediately before (May 2000) and at the end of (May 2001) the one-year period. This is consistent with the Department's requirement to use multiple years of stack test flowrates when available for determining actual annual emission rates for fee purposes for CEM pollutants at Rule 62-213.205(1)(e), Florida Administrative Code (FAC).

Overall MWC availability for the year, which includes periods of downtime for scheduled maintenance as well as the normal outages for malfunctions and repairs, was 86.6% (down from the two-month average of 89.8%). Overall CEM emission averages (in ppm_{dv} corrected to 7% O₂) were similar to the previous two-month estimates, but the average flowrate decreased when the additional year of dioxin stack test data was included. With the

C. H. Fancy, P.E., Chief
 August 22, 2001
 Page 2

decrease in overall unit availability and flowrates, there was a slight decrease in the estimated actual emissions as compared to the original two-month period.

The revised estimates of current actual emissions and the revised estimates of future actual emissions are shown in the following table, which replaces the table set forth on page 6 of the Department's Technical Evaluation and Determination.

Pollutant	Current Actual Emissions (TPY)	Rep. Future Actual Emissions (TPY)	Net Increase (TPY)	PSD Significance (TPY)	Subject to PSD?
PM/PM ₁₀	45	69/59	24/14	25/15	No
SO ₂	84	123	39	40	No
NO _x	1569	1608	39	40	No
CO	93	192	99	100	No
Pb	0.24	0.83	0.59	0.6	No
Hg	0.22	0.31	0.09	0.1	No
MWC Organics Total PCDD/F	9.5 x 10 ⁻⁵	9.8 x 10 ⁻⁵	3.0 x 10 ⁻⁶	3.5 x 10 ⁻⁶	No
MWC Acid Gases HCl & SO ₂	232	271	39	40	No

Also attached are certification pages from the County's Responsible Official and registered Professional Engineer. If you have any questions, please feel free to contact me at 732-968-9600 or Ronald D. Larson of HDR Engineering at 813/282-2398.

Sincerely,
 RTP ENVIRONMENTAL ASSOCIATES, INC.®



Donald F. Elias, Principal

cc: A.Linero/J.Kahn, Florida DEP;
 P.Talley/R.P.Stasis/W.Smith, Pinellas Co.;
 R.Larson, HDR Engineering; D.Deer, Esq., Landers & Parsons;
 R.Henson/S.Reinhart/J.McIntyre/M.Killeen/T.Porter, Wheelabrator;
 W.Corbin/PCRRF4 Proj.File, RTP

**CALCULATIONS of
CURRENT ACTUAL EMISSIONS
for PINELLAS COUNTY RRF**

June 2000 - May 2001 Data

Information from CEM Systems (Wheelabrator Pinellas Inc.'s June 5, 2001 letter):Average Stack Concentrations (ppmdv at 7% O₂) for June 2000 - May 2001 from CEM data:

NO _x :	(189.65 + 193.02 + 191.38)/3 =	191.35 ppmdv at 7% O ₂
SO ₂ :	(12.0 + 7.03 + 3.03)/3 =	7.35 ppmdv at 7% O ₂
CO:	(23.4 + 18.1 + 14.2)/3 =	18.6 ppmdv at 7% O ₂

June 2000 – May 2001 Operating Rates (percent of available hours):

Unit 1:	453,808 min/(60 min/hr)/(8760 hrs) =	86.34%
Unit 2:	448,836 min/(60 min/hr)/(8760 hrs) =	85.39%
Unit 3:	462,241 min/(60 min/hr)/(8760 hrs) =	<u>87.95%</u>
	Average:	86.56%

Information from Stack Tests:Flowrates (dscfm at 7% O₂) during May 2000 PCDD/F Stack Tests:

Unit 1:	(142,100 dscfm)(20.9%-10.2%)/(20.9%-7%) =	109,386 dscfm at 7% O ₂
Unit 2:	(134,400 dscfm)(20.9%- 9.8%)/(20.9%-7%) =	107,327 dscfm at 7% O ₂
Unit 3:	(118,800 dscfm)(20.9%- 9.6%)/(20.9%-7%) =	96,578 dscfm at 7% O ₂

Flowrates (dscfm at 7% O₂) during May 2001 PCDD/F Stack Tests:

Unit 1:	(122,500 dscfm)(20.9%- 9.3%)/(20.9%-7%) =	102,230 dscfm at 7% O ₂
Unit 2:	(127,600 dscfm)(20.9%-10.2%)/(20.9%-7%) =	98,224 dscfm at 7% O ₂
Unit 3:	(99,250 dscfm)(20.9%- 8.3%)/(20.9%-7%) =	<u>89,968 dscfm at 7% O₂</u>
	Average:	100,619 dscfm at 7% O ₂

Emission Calculations:Actual Emission Rates (tons/year) for CEM Pollutants:

NO _x :	(191.35 ppmdv)(100619 dscfm)(46 lb/mole)(0.0025956 moles/dscf)(60 min/hr) (8760 hrs/yr)(86.56%)(3 units)/(10 ⁶ ppm)/(2000 lb/ton) =	1569 tons/year
SO ₂ :	(7.35 ppmdv)(100619 dscfm)(64 lb/mole)(0.0025956 moles/dscf)(60 min/hr) (8760 hrs/yr)(86.56%)(3 units)/(10 ⁶ ppm)/(2000 lb/ton) =	84 tons/year
CO:	(18.6 ppmdv)(100619 dscfm)(28 lb/mole)(0.0025956 moles/dscf)(60 min/hr) (8760 hrs/yr)(86.56%)(3 units)/(10 ⁶ ppm)/(2000 lb/ton) =	93 tons/year

Actual Emission Rates (tons/year) for non-CEM Pollutants (see attached table):

PM:	(3.94 lb/hr) (8760 hrs/yr)(86.56%)(3 units)/(2000 lb/ton) =	45 tons/year
Pb:	(0.0207 lb/hr) (8760 hrs/yr)(86.56%)(3 units)/(2000 lb/ton) =	0.24 tons/year
Hg:	(0.0197 lb/hr) (8760 hrs/yr)(86.56%)(3 units)/(2000 lb/ton) =	0.22 tons/year
PCDD/F:	(8.33E-6 lb/hr)(8760 hrs/yr)(86.56%)(3 units)/(2000 lb/ton) =	9.47E-5 tons/year
HCl:	(13.0 lb/hr) (8760 hrs/yr)(86.56%)(3 units)/(2000 lb/ton) =	148 tons/year

Actual Emission Rates (tons/year) for MWC-Specific Pollutants:

MWC Acid Gases:	(84 tons _{SO2} /year)+(148 tons _{HCl} /year) =	232 tons/year
MWC Metals:	-----see PM emission rates above-----	
MWC Organics:	---see PCDD/F emission rate above---	

**CALCULATIONS of
CURRENT ACTUAL EMISSIONS
for PINELLAS COUNTY RRF**

June 2000 - May 2001 Data

1998-2001 Stack Test Measurements (lbs/hr)									
Pollutant	Unit 1		Unit 2			Unit 3			
	May 2000	May 2001	Sept 1999	May 2000	May 2001	Dec 1998	Sept 1999	May 2000	May 2001
PM	0.52	0.24	3.94	0.46	0.30	0.46	1.13	2.47	0.20
Lead	0.00108	0.00722	0.0207	0.000684	0.000596	0.00135	0.00262	0.00994	0.000372
Mercury	0.00588	0.0122	0.00915	0.00293	0.00760	0.0197	0.00374	0.00376	0.00492
PCDD/F	2.12e-07	3.70e-07	3.19e-06	1.18e-06	2.16e-06	8.33e-06	4.18e-06	1.58e-06	1.22e-06
HCl	10.2	5.67	12.5 ^a	7.09	11.0	13.0 ^a	10.2 ^a	5.82	10.9

^aBased on the average HCl concentration (ppmdv at 7% O₂) and the average flowrate and oxygen content during the PCDD/F stack test (dscfm at 7% O₂) for the same unit and year.



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**LETTER OF
TRANSMITTAL**

RECEIVED

AUG 23 2001

To: C. H. Fancy, P.E., Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Date: August 22, 2001

Project:

From: Donald F. Elias

BUREAU OF AIR REGULATION

We Are Sending You: Attached Under Separate Cover

Via: 1st Class Mail Federal Express Hand Delivery

United Parcel Service Other _____

Copies	Date	No.	Description
1	8/22/01		RE: Pinellas County Resource Recovery Facility Capital Replacement Project PSD Permit PSD-FL-011B and PSD-FL-098B/DEP File No. 1030117-003-AC.
			Two Copies same as above to: A. Linero and J. Kahn

These are Transmitted as Checked Below:

- For Approval
- For Review and Comment
- Resubmit ___ Copies for Approval
- For Your Use
- Copies Returned After Loan
- For Signature
- As Requested
- Returned for Corrections
- For Signature and Submittal to State

Remarks:

Copy to:

Signed: Carey J. Toboogy

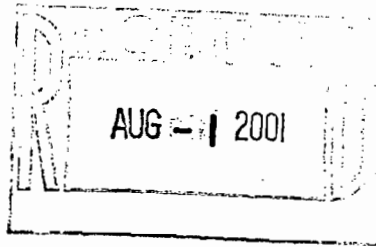
If enclosures are not as noted, kindly notify us at once.



Wheelabrator Pinellas Inc.

A Waste Management Company

3001 110th Avenue North
St. Petersburg, FL 33716-2002
(727) 572-9163
(727) 572-4370 Fax



June 5, 2001

Donald Elias
RTP Environmental
239 US Highway 22 East
Green Brook, New Jersey 08812

Dear Don:

The following tables summarize the average steam flow, NOx, CO, and SO₂ at the Pinellas County Resource Recovery Facility (PCRRF) for all three boilers (Unit 1, 2, and 3):

Boiler	Steam Flow (klbs/hour)	Unit On Line (minutes)	NOx (ppmdv @ 7% O ₂)	SO ₂ (ppmdv @ 7% O ₂)	CO (ppmdv @ 7% O ₂)
Unit 1	208.6	453,808	189.65	12.0	23.4
Unit 2	205.2	448,836	193.02	7.03	18.1
Unit 3	209.1	462,241	191.38	3.03	14.2


Please note these averages are from 00:00 on 6/1/00 to 23:59 on 05/31/01 CEMS time at the PCRRF (CEMS time remains at Eastern Standard Time). This information is from the ESC computer system.

Boiler	Steam Flow (klbs/hour)	Unit On Line (minutes)	NOx (ppmdv @ 7% O ₂)	SO ₂ (ppmdv @ 7% O ₂)	CO (ppmdv @ 7% O ₂)
Unit 1	215.1	40,869	190.03	8.9	12.2
Unit 2	213.9	40,184	197.74	7.80	9.2
Unit 3	217.7	42,547	195.95	4.62	7.4

Please note these averages are from 00:00 on 05/01/01 to 23:59 on 05/31/01. CEMS time at the PCRRF (CEMS time remains at Eastern Standard Time). This information is from the ESC computer system.

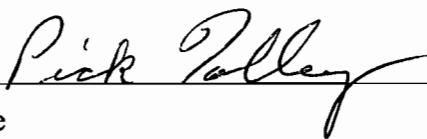
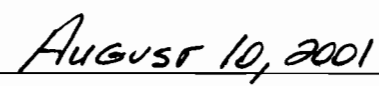
If you require any further information or have any questions, please feel free to give me a call at (727) 572-9163 x16.

Sincerely,

Janet McIntyre 
Janet E. Mc Intyre
EH&S Director

Cc: Ron Larson, HDR

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Mr. Pick Talley, Director of Utilities, Pinellas County
2. Owner/Authorized Representative or Responsible Official 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. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (727) 464-3438 Fax: (727) 464-3944
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> <p style="text-align: center;"> </p> <p>Signature _____ Date _____</p>

* 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 [] , 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 [X], 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 [] , 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 permit.


Signature _____

8/10/01
Date _____

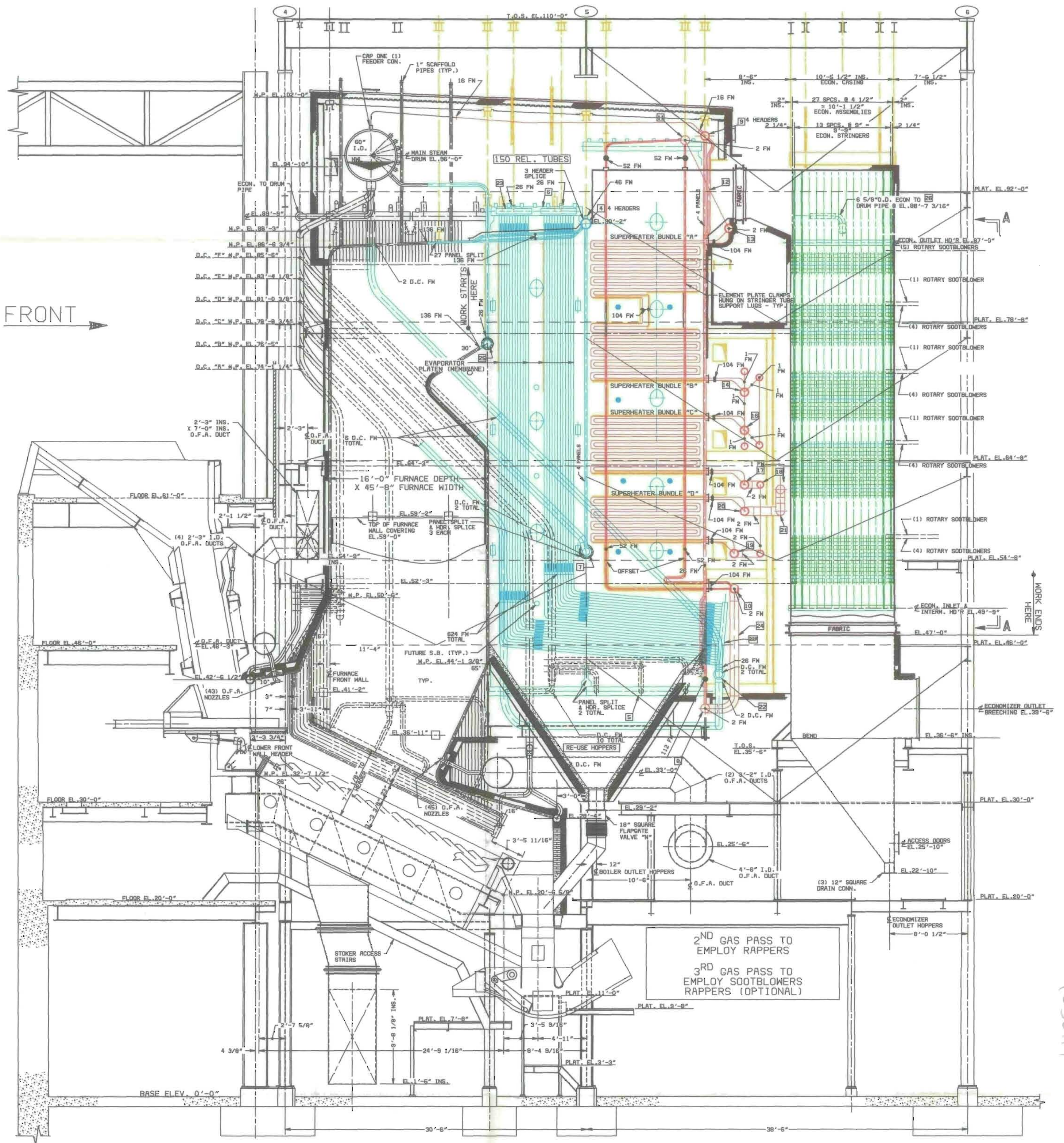
* Attach any exception to certification statement.

RECEIVED

AUG 13 2001

SOLIDWASTE OPERATION

2628



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WORK ENDS
HERE

2ND GAS PASS TO EMPLOY RAPPERS
3RD GAS PASS TO EMPLOY SOOTBLOWERS RAPPERS (OPTIONAL)

1030117

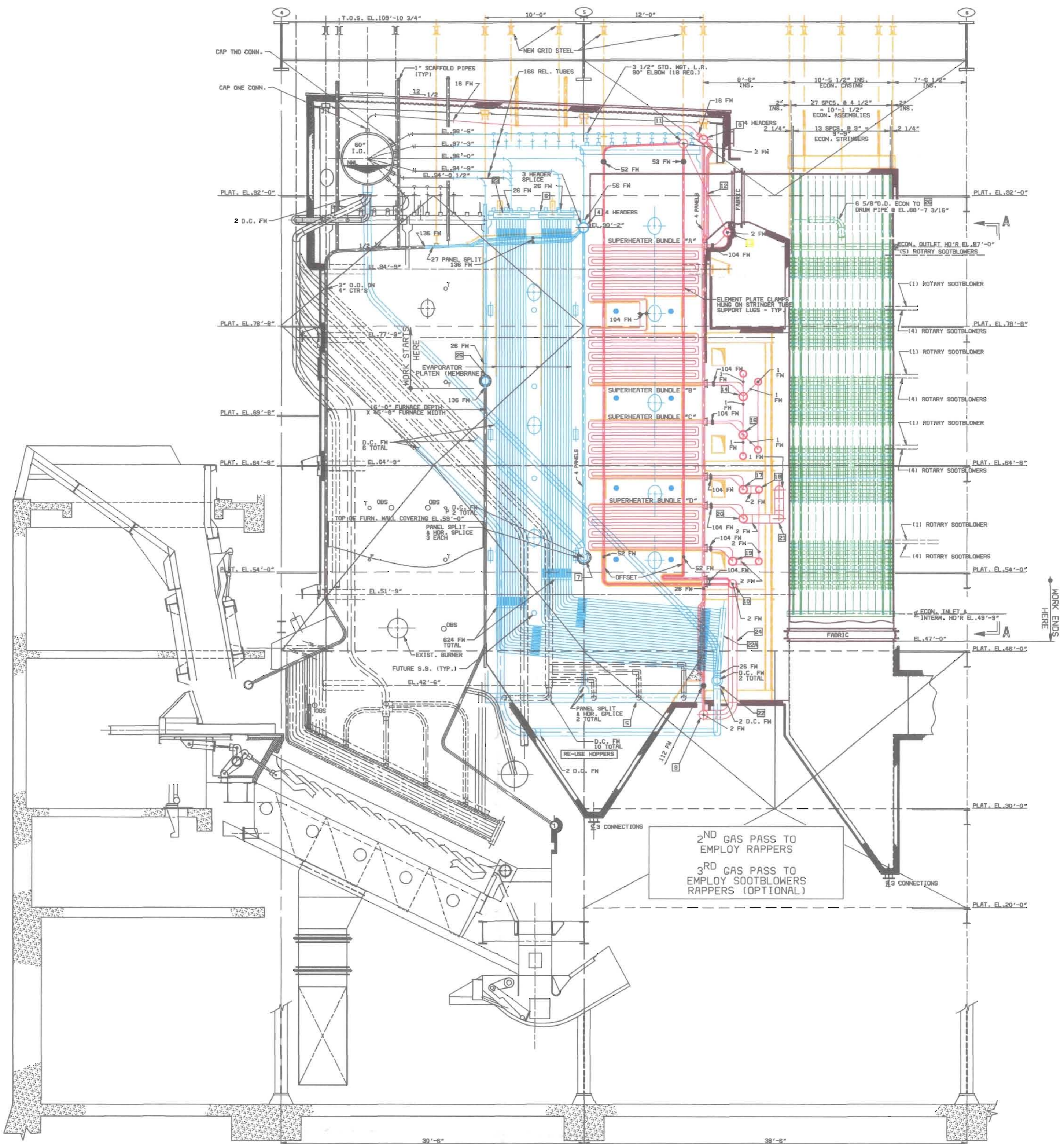
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DEUTSCHE BABCOCK
DB RILEY, INC.
 WORCESTER, MASSACHUSETTS, U.S.A.
 PROPOSED DESIGN

JOB: WHEELABRATOR TECHNOLOGIES INC.
 PINELLAS UNIT 3

DRAWN BY: KENNEDY
 DATE: 10/3/00
 APPROVED BY: BOB FOLEY

DWG. NO.: 500625-UNIT3
 P-500525-UNIT3-02



2ND GAS PASS TO EMPLOY RAPPERS
 3RD GAS PASS TO EMPLOY SOOTBLOWERS RAPPERS (OPTIONAL)

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DEUTSCHE BABCOCK
DB RILEY, INC.
 WORCESTER, MASSACHUSETTS, U.S.A.
 PROPOSED DESIGN
 FROM: MHELABRATOR TECHNOLOGIES INC.,
 PINELLAS UNIT 1 & 2
 PINELLAS COUNTY, FL
 DRAWN BY: KENNEDY
 APPROVED BY: BOB FOLEY
 DATE: 10/31/00
 DWG. NO.: NTS-DB-RFL-DWG.
 P-500525-UNIT1-2-02 NO. 500625-UNIT1-2

Before the undersigned authority personally appeared Paula Lang
who on oath says that he is Legal Clerk
of the St. Petersburg Times All Pinellas editions
a daily newspaper published at St. Petersburg, in Pinellas County, Florida: that
the attached copy of advertisement, being a Legal Notice
in the matter RE: Public Notice

AD#990908071 in the Court
was published in said newspaper in the issues of November 10, 2000

Affiant further states the said St. Petersburg Times
is a newspaper published at St. Petersburg, in said Pinellas County, Florida, and
that the said newspaper has heretofore been continuously published in said Pinellas
County, Florida, each day and has been entered as second class mail matter at the
post office in St. Petersburg, in said Pinellas County, Florida, for a period of one year
next preceding the first publication of the attached copy of advertisement, and affiant
further says that he has neither paid nor promised any person, firm, or corporation
any discount, rebate, commission or refund for the purpose of securing this
advertisement for publication in the said newspaper.

Sworn to and subscribed before
me this 10th day of
November A.D. 2000

Gail C. Bilgutay
Notary Public (SEAL)

Personally known
or produced identification _____
Type of identification produced _____



LEGAL NOTICE LEGAL NOTICE

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1030117-003-AC, PSD-FL-011B and PSD-FL098B

Pinellas County Utilities
Pinellas County Resource Recovery Facility
Pinellas County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Pinellas County Utilities, for its Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The modification is to authorize construction of its Capital Replacement Project which includes refurbishment of portions of the facility including the three existing boilers. The applicant's mailing address is: 14 South Ft. Harrison Avenue, Clearwater, Florida 33756. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C., and 40 CFR 52.21, Prevention of Significant Deterioration (PSD), because there will be no PSD-significant increase in actual emissions from the facilities municipal waste combustor units.

This project is not subject to review under Section 403.506 F.S. (Power Plant Siting Act), because it provides for no expansion in steam generating capacity. An air quality impact analysis was not required.

The Department will issue the final permit modification 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 and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments requests for public meetings 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 written 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.

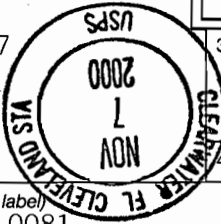
A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Air Quality Division Pinellas County Department of Environmental Management 300 South Garden Avenue Clearwater, Florida 33756 Telephone: 813/464-4422	Dept. of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619-8218 Telephone: 813/744-6100
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The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the applicant's authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400.

(990908071) 11/10/00

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Received by <i>(Please Print Clearly)</i> B. Date of Delivery</p> <hr/> <p>C. Signature X <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <hr/> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <hr/> <p>4. Restricted Delivery? <i>(Extra Fee)</i> <input type="checkbox"/> Yes</p>
<p>1. Article Addressed to:</p> <p>Mr. Pick Talley Director of Utilities Pinellas County Utilities PO Box 1780 Clearwater, FL 33757</p>	
<p>2. Article Number <i>(Copy from service label)</i> 7099 3400 0000 1453 0081</p>	



PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Article Sent To:
Mr. Pick Talley, Director of Utilities

Postage \$	Pinellas County Postmark Here
Certified Fee	
Return Receipt Fee <i>(Endorsement Required)</i>	
Restricted Delivery Fee <i>(Endorsement Required)</i>	
Total Postage & Fees \$	

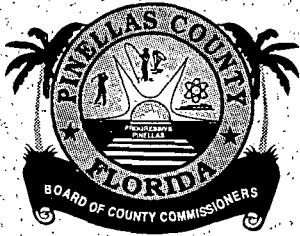
Name *(Please Print Clearly)* *(to be completed by mailer)*
Mr. Pick Talley

Street, Apt. No., or PO Box No.
PO Box 1780

City, State, ZIP+4
Clearwater, FL 33757

PS Form 3800, July 1999 See Reverse for Instructions

7099 3400 0000 1453 0081



"Serving You Every Day"

BOARD OF COUNTY COMMISSIONERS
PINELLAS COUNTY, FLORIDA

PINELLAS COUNTY UTILITIES

P.O. BOX 1780
CLEARWATER, FLORIDA 33757

RECEIVED

NOV 16 2000

BUREAU OF AIR REGULATION

COMMISSIONERS

ROBERT B. STEWART - CHAIRMAN
CALVIN D. HARRIS - VICE CHAIRMAN
SALLIE PARKS
KAREN WILLIAMS SEEL
BARBARA SHEEN TODD

November 14, 2000

State of Florida
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**RE: Pinellas County - Resource Recovery Facility
Air Construction Permit Modification - PSD-FL-011B & PSD-FL-098B
INTENT-TO-ISSUE - Proof of Publication**

Pursuant to Section 403.815, F.S., and Rule 62-110-106(7)(a)1, F.A.C., Pinellas County has arranged to be published on November 10, 2000, a APUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION@, for the subject permits.

Attached for your records is the proof of publication, as provided by the St. Petersburg (FL) Times newspaper.

Should you have any questions, please contact me at your convenience.

Very truly yours,

PINELLAS COUNTY UTILITIES

Pick Talley
Director

Enclosure

cc: R. Peter Stasis, P.E., Director of Utilities Engineering
Warren Smith, Director of Solid Waste Operations
Donald F. Elias, RTP Environmental Associates, Inc.
Bill Thomas, P.E., FDEP, Southwest District Office
David Dee, Esq., Landers & Parsons
Ron Larson, HDR Engineering, Inc.

File

J. Rahn
B. Thomas, SWD
P. Hessling, Pinellas Co.

EPA
NPS



Before the undersigned authority personally appeared Paula Lang
who on oath says that he is Legal Clerk _____
of the St. Petersburg Times All Pinellas editions _____
a daily newspaper published at St. Petersburg, in Pinellas County, Florida: that
the attached copy of advertisement, being a Legal Notice _____
in the matter RE: Public Notice _____

AD#990908071 in the _____ Court
was published in said newspaper in the issues of November 10, 2000

Affiant further states the said St. Petersburg Times
is a newspaper published at St. Petersburg, in said Pinellas County, Florida, and
that the said newspaper has heretofore been continuously published in said Pinellas
County, Florida, each day and has been entered as second class mail matter at the
post office in St. Petersburg, in said Pinellas County, Florida, for a period of one year
next preceding the first publication of the attached copy of advertisement, and affiant
further says that he has neither paid nor promised any person, firm, or corporation
any discount, rebate, commission or refund for the purpose of securing this
advertisement for publication in the said newspaper.

Sworn to and subscribed before
me this 10th day of
November A.D. 2000

[Signature]
Notary Public (SEAL)



Personally known _____
or produced identification _____
Type of identification produced _____

LEGAL NOTICE LEGAL NOTICE

**PUBLIC NOTICE OF INTENT TO ISSUE AIR
CONSTRUCTION PERMIT MODIFICATION**

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1030117-003-AC, PSD-FL-011B and PSD-FL098B

Pinellas County Utilities
Pinellas County Resource Recovery Facility
Pinellas County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Pinellas County Utilities, for its Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The modification is to authorize construction of its Capital Replacement Project which includes refurbishment of portions of the facility including the three existing boilers. The applicant's mailing address is: 14 South Ft. Harrison Avenue, Clearwater, Florida 33756. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C., and 40 CFR 52.21, Prevention of Significant Deterioration (PSD), because there will be no PSD-significant increase in actual emissions from the facilities municipal waste combustor units.

This project is not subject to review under Section 403.506 F.S. (Power Plant Siting Act), because it provides for no expansion in steam generating capacity. An air quality impact analysis was not required.

The Department will issue the final permit modification 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 and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments requests for public meetings 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 written 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:

Dept. of Environmental Protection Bureau of Air Regulation Suite 4, 111 S. Magnolia Drive Tallahassee, Florida 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Air Quality Division Pinellas County Department of Environmental Management 300 South Garden Avenue Clearwater, Florida 33756 Telephone: 813/464-4422	Dept. of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619-8218 Telephone: 813/744-6100
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The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the applicant's authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida 32399-2400.

MEMORANDUM

NOV 13 2000

TO: Joseph Kahn

BUREAU OF AIR REGULATION

FROM: Donald F. Elias FAXED
11-8-00

DATE: November 8, 2000

SUBJ: Preliminary Draft of Modification to Pinellas County RRF PSD Permit

We have reviewed your preliminary draft of the air construction permit modification for the Pinellas County Resource Recovery Facility (PCRRF) dated October 30, 2000. We would like to offer the following comments:

- (1) Please revise the address for Mr. Pick Talley from:

P.O. Box 1780
Clearwater, FL 33757

to:

14 S. Fort Harrison Avenue, 5th Floor
Clearwater, FL 33756

This occurs on the cover letter, the header on page 1 of 3 of the Intent to Issue Air Construction Permit Modification, the first paragraph on page 1 of the Public Notice of Intent to Issue Air Construction Permit Modification, Section 1 on page 1 of the Technical Evaluation and Determination, and the address block on the top of the permit modification letter.

- (2) **MODIFICATION** is misspelled at the very top of page 1 of the Public Notice of Intent to Issue Air Construction Permit Modification.
- (3) We found the quote from the Federal Register given at the bottom of page 2 of the Technical Evaluation and Determination at the beginning of the middle column of 65 FR 34011 and not page 34012.
- (4) We believe that the Federal Register notice describing EPA's analysis of changes to utilities not being reported to permitting authorities was in the July 24, 1998 Federal Register (Volume 63) and not the 2000 Federal Register (Volume 65). Therefore, the citations in lines 21, 23, and 30 of the middle paragraph of page 3 of the Technical Evaluation and Determination should be revised accordingly.
- (5) The fourth line of the second paragraph in Section 3 on page 1 of the Technical Evaluation and Determination should read "more stringent **THAN** the requirements" instead of "more stringent **THAT** the requirements."

- 2 -

- (6) The eleventh line of the last paragraph on page 4 of the Technical Evaluation and Determination should read “projections RATHER than annually” instead of “projections RATER than annually.”
- (7) For clarity, we respectfully request that “(tpy)” be added to the last line before the table AND to the applicable column titles (all but first and last column) in the column on page 6 of the Technical Evaluation and Determination.
- (8) It should be noted that this table also demonstrates that there will be no significant increase in MWC metals (as measured by emissions of particulate matter), MWC organics (as measured by total PCDD/PCDF emissions), or MWC acid gases (as measured by SO₂ and HCl emissions) as required by the PSD requirements for modifications at MWC units. Accordingly, we request that “MWC metals, MWC organics, and MWC acid gases” be added to the list of PSD pollutants without significant increases at the end of both the third and last paragraphs on page 7 and the first paragraph on page 8 of the Technical Evaluation and Determination.
- (9) We wish to note that the cost of the total Capital Replacement Project (CRP) is \$51.6 million while the cost of the regulated portion affecting air emissions (the boiler portion) is \$35 million. Therefore, the seventh line of the next to last paragraph of Section 3 on page 7 of the Technical Evaluation and Determination should probably read “because the capital cost for the REGULATED PORTIONS OF THE MWC UNITS of \$35 million” instead of “because the capital cost for the PROJECT of \$35 million.”
- (10) The last line of the first paragraph of “New Specific Condition” on page 1 of the permit modification letter should read “100 gallon per minute” and not “1000 gallon per minute.”

cc: R.Larson/P.Stasis/P.Talley/W.Smith/D.Deer/R.Menke
T.Porter/M.Killeen/R.Henson/S.Reinhart/W.Corbin/PCRRF4 Proj.File



U.S. Environmental Protection Agency
Region 5 - Air and Radiation Division

Correspondence

May 23, 2000

R-19J

Henry Nickel
Counsel for the Detroit Edison Company
Hunton & Williams
1900 K Street, N.W.
Washington D.C. 20006-1109

Dear Mr. Nickel:

I am responding to your request on behalf of the Detroit Edison Company for an applicability determination regarding the proposed replacement and reconfiguration of the high pressure section of two steam turbines at the company's Monroe Power Plant, referred to as the Dense Pack project. Specifically, you requested that the United States Environmental Protection Agency (EPA) determine whether the Dense Pack project at the Monroe Power Plant would be considered a major modification that would subject the project to pollution control requirements under the Prevention of Significant Deterioration (PSD) program.

We have reviewed your original request, dated June 8, 1999, and the supplemental information you submitted on December 10, 1999, and March 16, 2000. We provisionally conclude that the Dense Pack project would not be a major modification. Thus, Detroit Edison may proceed with the project without first obtaining a PSD permit. Although the Dense Pack project would constitute a nonroutine physical change to the facility that might well result in a significant increase in air pollution, Detroit Edison asserts that emissions will not in fact increase due to the construction activity, and EPA has no information to dispute that assertion.

As you know, nonroutine changes of any type, purpose, or magnitude at an electric utility steam generating unit -- ranging from projects to increase production efficiency to even the complete replacement of entire major components -- are excluded from PSD coverage as long as they do not

significantly increase emissions from the source. Thus, Detroit Edison has been free to proceed at any time with the Dense Pack project without first obtaining a PSD permit as long as it adheres to its stated intention to not increase emissions as a result of the project. Indeed, EPA encourages the company to proceed with the project on this basis, since it appears to both reduce emissions per unit of output and not increase actual air pollution.

As you are also aware, under the applicable new source review regulations, in determining if a physical change will result in a significant emissions increase at an electric utility plant, companies may use an "actual" to "representative actual annual emissions" test for emissions from the electric utility steam generating unit, under which a calculation of baseline emissions and a projection of future emissions after the change is needed. Our determination of nonapplicability is provisional because Detroit Edison has not, to our knowledge, provided a calculation of baseline emissions or projected future emissions to the permitting agency, and this should be done prior to the start of construction. The basis for this determination is summarized below and is set forth in full in the enclosed detailed analysis.

In determining whether an activity triggers PSD, the Clean Air Act and EPA's regulations specify a two-step test. The first step is to determine if such activity is a physical or operational change, and if it is, the second step is to determine whether emissions will increase because of the change. The statute admits of no exception from its sweeping scope, but EPA's regulations contain some narrow exceptions to the definition of physical or operational change. In particular, Detroit Edison claims that the Dense Pack project is eligible for the exclusion for routine maintenance, repair, and replacement. The determination of whether a proposed physical change is "routine" is a case-specific determination which takes into consideration the nature, extent, purpose, frequency, and cost of the work, as well as other relevant factors. After carefully reviewing all the information you submitted in light of the relevant factors, EPA has determined that the proposed project is not "routine."

The purpose of the Dense Pack project, to significantly enhance the present efficiency of the high pressure section of the steam turbine, signifies that the project is not routine. An upgrade of this nature is markedly different from the frequent, inexpensive, necessary, and incremental maintenance and replacement of deteriorated blades that is

commonly practiced in the utility industry. For instance, past blade maintenance and replacement of only the deteriorated blades at Detroit Edison has never increased efficiency over the original design. Accordingly, because increasing turbine efficiency by a total redesign of a major component is a defining feature of the proposed Dense Pack project, it clearly goes significantly beyond both historic turbine work at Detroit Edison, and what would otherwise be considered a regular, customary, or standard undertaking for the purpose of maintaining the existing steam turbine units. The project also goes well beyond routine turbine maintenance, repair, and replacement activities for the utility industry in general.

The nature and extent of the work in question -- replacement of the entire high pressure sections of the steam turbines for Units 1 and 4 at Monroe -- suggests that the Dense Pack project is not routine. It would result in greater efficiency above the level that can be reached by simply replacing deteriorated blades with ones of the same design and, in addition, will substantially increase efficiency over the original design. Specifically, the Dense Pack upgrade would not only restore the 7 percent of the efficiency rating lost over the years at each unit but would improve the unit's efficiency by an additional 5 percent over its original design capacity. Accordingly, the proposed project represents a significant and major redesign and replacement of the entire high pressure sections of the steam turbines at Units 1 and 4 at the Monroe facility.

The frequency with which utilities have undertaken turbine upgrades like the Dense Pack project also indicates the nonroutine nature of the changes. The information provided by Detroit Edison, regarding past history at the Monroe facility, describes what is characterized as necessary maintenance, repair, and replacement of deteriorated turbine blades approximately every 4 years. During these overhaul periods, it is not uncommon for the company to replace up to several turbine blades at one time. It is common among other utilities to also perform similar turbine maintenance. However, Detroit Edison has not provided any information to suggest that a complete replacement and redesign of the high pressure section of a steam turbine is conducted frequently at Monroe or at any other individual utility. Instead, Detroit Edison relies on its claim that projects "similar" to the Dense Pack project have been performed at a number of utilities. This information does not indicate that the replacement of the high pressure section of the steam turbine is frequent at

the typical utility source; to the contrary, the only available information reflects that projects like the Dense Pack project have been performed only one time, if ever, at individual sources.

The cost of the Dense Pack project is significant and tends to indicate that this project is nonroutine. Detroit Edison expects the Dense Pack replacement to cost approximately \$6 million for each turbine unit, for a total of \$12 million. The EPA has rejected claims of routineness in past cases where the cost was substantially less than this figure. Moreover, Detroit Edison intends to capitalize the entire cost of this project, and EPA believes that a \$12 million project that is 100 percent capital improvement indicates that it is a major undertaking.

Beyond the clearly significant absolute cost of this project, available information suggests that this expenditure far exceeds the cost typically associated with turbine blade maintenance activity. Detroit Edison provided only a summary of the total project costs for past maintenance and inspections at the facility, the total costs of which ranged from less than \$1 million to a little more than \$6 million. Although Detroit Edison did not provide any detail regarding what specific activities comprise these aggregated amounts, it acknowledges that it spent only \$18,700, \$33,100, and \$7,900 to replace high-pressure rotors in three turbine projects in 1981 and 1982. Further, the project is significantly more costly than simply replacing deteriorated blades today; Detroit Edison acknowledges that the Dense Pack upgrade would cost three times more than its alternative blade repair and replacement project. Accordingly, it appears that the costs associated with the Dense Pack project greatly exceed the amounts spent previously by Detroit Edison or that it would spend presently for the replacement of deteriorated turbine blades or rotors.

For the reasons delineated above, we conclude that the changes proposed by Detroit Edison are not routine. Detroit Edison's submissions do not demonstrate that projects such as the Dense Pack project are frequent, inexpensive, or done for the purpose of maintaining the facility in its present condition. Instead, the source relies on two principal arguments: (1) it claims that this project is less significant in scope than was the activity in question in the 1988 applicability determination for the Wisconsin Electric Power Company (WEPCO); and (2) it alleges that EPA has interpreted the exclusion for routine activity expansively to exempt all projects that do not increase a unit's emission rate. EPA rejects both of these arguments,

the former because both EPA and the U.S. Court of Appeals for the Seventh Circuit viewed WEPCO's activity as "far from" routine and thus this attempted comparison to WEPCO is unsuitable, and the latter because it is demonstrably incorrect. The attached analysis addresses these points in significant detail.

When nonroutine physical or operational changes significantly increase emissions to the atmosphere, they are properly characterized as major modifications and are subject to the PSD program. In general, a physical change in the nature of the Dense Pack project, which provides for the more economical production of electricity, would be expected to result in the increased utilization of the affected units, and thus, increased emissions. Notwithstanding the fact the Monroe units may be high on the dispatch order, the Dense Pack project would allow Detroit Edison to produce electricity more cheaply per unit of output, thereby creating an incentive to run Units 1 and 4 above current levels. Even a small increase over current normal levels in the utilization of the affected units would result in a significant increase in actual emissions of criteria pollutants. For example, in 1997, at the Monroe facility Unit 1 emitted approximately 14,000 tons of nitrogen oxides (NOx) and 41,000 tons of sulfur dioxide (SO₂), and Unit 2 emitted 12,000 tons of NOx and 35,000 tons of SO₂. Based on this information, if a one to five percent increase in operation were to result from the Dense Pack project, increases on the order of 160-800 tons of NOx and 400-2000 tons of SO₂ would occur.

Detroit Edison, however, maintains that emissions will not increase as a result of the Dense Pack project. Specifically, the company contends that representative actual annual emissions following the change will not be greater than its pre-change actual emissions, because the Dense Pack upgrade will not result in increased utilization of the units. As you are aware, the PSD regulations (under the provisions commonly known as the "WEPCO rule") allow a source undertaking a nonroutine change that could affect emissions at an electric utility steam generating unit to lawfully avoid the major source permitting process by using the unit's representative actual annual emissions to calculate emissions following the change if the source submits information for 5 years following the change to confirm its pre-change projection. In projecting post-change emissions, Detroit Edison does not have to include that portion of the unit's emissions which could have been accommodated before the change and is unrelated to the change, such as demand growth.

Under the WEPCO rule, Detroit Edison must compute baseline actual emissions and must project the future actual emissions from the modified unit for the 2-year period after the physical change (or another 2-year period that is more representative of normal operation in the unit's modified state). As noted above, Detroit Edison has not provided these figures to verify its projection of no increase in actual emissions, and should submit them to the Michigan Department of Environmental Quality prior to beginning construction. In addition, Detroit Edison must maintain and submit to the permitting agency on an annual basis for a period of at least 5 years (or a longer period not to exceed 10 years, if such a period is more representative of the modified unit's normal post-change operations) from the date the units at the Monroe Plant resume regular operation, information demonstrating that the renovation did not result in a significant emissions increase. If Detroit Edison fails to comply with the reporting requirements of the WEPCO rule or if the submitted information indicates that emissions have increased as a consequence of the change, it will be required to obtain a PSD permit for the Dense Pack project.

Finally, regardless of whether PSD review is triggered due to the Dense Pack project, Detroit Edison must meet all other applicable federal, state, and local air pollution requirements.

This determination will be final in 30 days unless, during that time, Detroit Edison seeks to confer with or appeal to the Administrator or her designee regarding it. If you have any questions regarding this determination, please contact Laura Hartman, Environmental Engineer, at (312) 353-5703, or Jane Woolums, Associate Regional Counsel, at (312) 886-6720.

Sincerely,

/s/

Francis X. Lyons
Regional Administrator

Enclosure — *SEE DET 80.PDF*

cc: Peter Marquardt, Esq., Special Counsel
Detroit Edison Company
2000 Second Avenue - 688 WCB
Detroit, Michigan 48336

Russell Harding, Director
Michigan Department of Environmental Quality

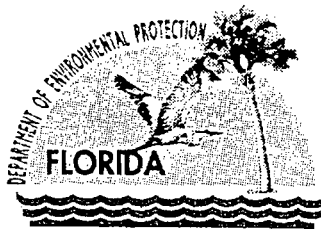


AIR AND RADIATION DIVISION
77 WEST JACKSON BOULEVARD (A-18J)
CHICAGO, ILLINOIS 60604

(800) 621-8431 or (312) 353-2212



de.pdf



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

October 30, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Pick Talley
Director of Utilities
Pinellas County Utilities
PO Box 1780
Clearwater, Florida 33757

Re: DEP File No. 1030117-003-AC, PSD-FL-011B and PSD-FL-098B
Modification of PSD Permits PSD-FL-011A and PSD-FL-098A
Pinellas County Resource Recovery Facility

Dear Mr. Talley:

Enclosed is one copy of the draft air construction permit modification for the Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The Technical Evaluation and Determination, the Department's Intent to Issue Air Construction Permit Modification and the Public Notice of Intent to Issue Air Construction Permit Modification are also included.

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

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact Joseph Kahn, P.E., at 850/921-9519 or Mr. Linero at 850/488-0114.

Sincerely,

aa Linero 10/30

fa C. H. Fancy, P.E., Chief,
Bureau of Air Regulation

CHF/jk

Enclosures

In the Matter of an
Application for Permit by:

Mr. Pick Talley, Director of Utilities
Pinellas County Utilities
PO Box 1780
Clearwater, Florida 33757

DEP File No. 1030117-003-AC
PSD-FL-011B and PSD-FL-098B
Pinellas County Resource Recovery Facility
Pinellas County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit (copy of Draft permit attached) for the proposed project, detailed in the application specified above and the enclosed Technical Evaluation and Preliminary Determination, for the reasons stated below.

The applicant, Pinellas County Utilities, applied on August 30, 2000, to the Department for a modification to PSD permit numbers PSD-FL-011A and PSD-FL-098A for its Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The modification is to authorize construction of its Capital Replacement Project.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-212. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required to perform the proposed work.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, 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 Modification. 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 and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of Public Notice of Intent to Issue Air Permit Modification. Written comments and requests for public meetings 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 written 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.

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.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.


The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each

rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

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.


for C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice of Intent to Issue Air Construction Permit, Technical Evaluation and Preliminary Determination, and the Draft permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 11/2/00 to the person(s) listed:

Pick Talley *
Don Elias, RTP
Bill Thomas, P.E., DEP SW District
Peter Hessling, Pinellas County DEM
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

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) 11/2/00 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MOIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1030117-003-AC, PSD-FL-011B and PSD-FL-098B

Pinellas County Utilities
Pinellas County Resource Recovery Facility
Pinellas County

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification to Pinellas County Utilities, for its Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The modification is to authorize construction of its Capital Replacement Project with includes refurbishment of portions of the facility including the three existing boilers. The applicant's mailing address is: PO Box 1780, Clearwater, Florida 33757. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C., and 40 CFR 52.21, Prevention of Significant Deterioration (PSD), because there will be no PSD-significant increase in actual emissions from the facilities municipal waste combustor units.

This project is not subject to review under Section 403.506 F.S. (Power Plant Siting Act), because it provides for no expansion in steam generating capacity. An air quality impact analysis was not required.

The Department will issue the final permit modification 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 and requests for public meetings concerning the proposed permit issuance action for a period of thirty (30) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments requests for public meetings 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 written 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.

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

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:

Dept. of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Air Quality Division
Pinellas County Department of
Environmental Management
300 South Garden Avenue
Clearwater, Florida 33756
Telephone: 813/464-4422

Dept. of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100

The complete project file includes the application, technical evaluations, draft permit modification, and the information submitted by the applicant's authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, or the Department's reviewing engineer for this project, Joseph Kahn, P.E., at the Bureau of Air Regulation in Tallahassee, Florida, or call 850/488-0114, for additional information. Written comments directed to the Department's reviewing engineer should be sent to the following mailing address: Dept. of Environmental Protection, Bureau of Air Regulation, Mail Station #5505, Tallahassee, Florida, 32399-2400..

NOTICE TO BE PUBLISHED IN THE NEWSPAPER

^DRAFT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Pick Talley
Director of Utilities
Pinellas County Utilities
PO Box 1780
Clearwater, Florida 33757

Re: DEP File No. 1030117-003-AC, PSD-FL-011B and PSD-FL-098B
Modification of PSD Permits PSD-FL-011A and PSD-FL-098A
Pinellas County Resource Recovery Facility

The applicant, Pinellas County Utilities, applied on August 30, 2000, to the Department for a modification to PSD permit numbers PSD-FL-011A and PSD-FL-098A for its Pinellas County Resource Recovery Facility located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The modification is to authorize construction of its Capital Replacement Project. The Department has reviewed the modification request. The referenced permits are hereby modified as follows. This modification shall supplement conditions imposed by previous permitting actions.

New Specific Condition:

The owner or operator is authorized to construct its Capital Replacement Project as described in the letter application from Pinellas County Utilities dated August 30, 2000, and subsequent related information. The owner or operator is authorized to perform the construction activities generally described as: boiler refurbishment consisting primarily of replacement of the components from the furnace gas exit to the economizer gas exit for boiler unit trains 1, 2 and 3; rebuilding the refuse cranes; refurbishment of the cooling tower; upgrading the instrumentation control systems; refurbishment or replacement of feedwater pumps; tipping floor improvements; and upgrading the existing water regeneration equipment through the replacement of two nominal 1000 gallon per minute demineralizer trains.

The owner or operator shall submit to the Department on an annual basis, for a period of five years representative of normal post-change operations of MWC units 1, 2 and 3 ("the units"), within the period not longer than 10 years following the completion of construction of the last unit, information demonstrating that the Capital Replacement Project did not result in a PSD-significant emissions increase. A PSD-significant increase shall be defined as noted in Table 212.400-2 of Chapter 62-212, F.A.C. The information required above shall be based on a comparison of "baseline" past actual annual emissions with actual annual emissions for the given year after completion of the Capital Replacement Project, shall be reported on a calendar year basis, and shall start the first full calendar year following the completion of the Capital Replacement Project's boiler refurbishment of the last unit. The owner or operator shall utilize the "representative actual annual emissions" methodology, defined at Rule 62-210.200(12)(d), F.A.C., and the provisions of 40 CFR 52.21(b)(33), adopted by state rule, in its demonstration. If the Capital Replacement Project results in a PSD-significant emissions increase, or if the owner or operator fails to submit the required information, the units shall be subject to the requirements of PSD at that future time, which shall include a BACT determination for each PSD-significant pollutant.

The owner or operator shall estimate actual annual emissions using the general methodology shown in its letter application and subsequent related information, as discussed generally as follows. The owner or operator shall use the continuous emission monitoring system (CEMS) data to estimate actual annual emissions of the

pollutants monitored by the CEMS: NO_x, SO₂, and CO. The owner or operator shall use data from all post-retrofit compliance test(s) to estimate past actual annual emissions of other pollutants not monitored by the CEMS: PM/PM₁₀, lead, mercury, dioxins, hydrogen chloride. The owner or operator shall use the CEMS data to determine unit availability, which shall be used in determining actual annual emissions. The owner or operator shall use the CEMS data starting from June 1, 2000 until the start of construction of the Capital Replacement Project's boiler refurbishment for its determination of baseline past actual annual emissions. No more than two years of data shall be used to determine the baseline past actual annual emissions. As an alternative to the above, the owner or operator may use other methods approved by the Department.

[Rule 62-4.070(3) and 62-212.300(1)(d), F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permit modification is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit modification) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit modification was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed:

Pick Talley *
Don Elias, RTP
Bill Thomas, P.E., DEP SW District
Peter Hessling, Pinellas County DEM
Gregg Worley, EPA
John Bunyak, NPS

Clerk Stamp

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)

(Date)

1 APPLICANT NAME AND ADDRESS

Pinellas County Utilities
PO Box 1780
Clearwater, Florida 33757

Authorized Representative: Mr. Pick Talley, Director of Utilities

2 REVIEWING AND PROCESS SCHEDULE

September 1, 2000	Received letter application for permit modification
September 20, 2000	Received permit application fee
September 25, 2000	Received additional information
October 6, 2000	Received additional information by fax (original received October 11)
October 12, 2000	Received additional information
October 17, 2000	Received revised information
October 20, 2000	Received additional information by fax (original received October 23)
October 20, 2000	Application complete (for purposes of review time clock)
^DRAFT	Distributed Notice of Intent to Issue and supporting documents
^DRAFT	Notice of Intent published in ^

3 FACILITY DESCRIPTION, PROJECT DETAILS AND RULE APPLICABILITY

This existing Pinellas County Resource Recovery Facility has three municipal waste combustor units ("units") that burn municipal solid waste (MSW) and certain other solid wastes to produce steam used to make electricity via steam turbine generators. All three municipal waste combustor units are mass burn water wall boilers with auxiliary natural gas fired burners, and each has a nominal design rate capacity of 1000 tons of MSW per day, 417 mmBtu per hour, and 250,000 pounds steam per hour (assuming MSW with a heating value of 5000 Btu per pound). Units 1 and 2 began commercial operation in May 1983 and unit 3 began commercial operation in August 1986. The total nominal electric generating capacity of the facility is 75 MW from two steam turbine/generator sets, and the power is supplied to Florida Power Corporation pursuant to contract. The facility includes other emissions units related to operation of the facility, and a contiguous municipal solid waste landfill. The facility is located at 3001 110th Avenue North, St. Petersburg, Pinellas County. The facility's units were originally permitted under the federal PSD program (PSD-FL-011 permitted units 1 and 2 and PSD-FL-098 permitted unit 3). The facility was also certified under Florida's Power Plant Siting Act, under orders PA78-11 and PA83-18, and their respective modified orders.

The units are subject to the requirements of Rule 62-204.800(8)(b), F.A.C., and 40 CFR 60 Subpart Cb, the emission guidelines for "existing" large municipal waste combustors. The units were recently retrofitted with new combustion controls and advanced pollution control equipment to meet the emission requirements of this subpart. These requirements were more stringent than the requirements imposed on these units by previous PSD permits. Retrofit construction and initial compliance testing were completed in late 1998 for unit 3, summer 1999 for unit 2 and early 2000 for unit 1. Retrofit construction activities were authorized by an amendment to the PSD permits for the facility, denoted as PSD-FL-011A and PSD-FL-098A.

The applicant applied for a modification of its PSD permits to allow construction of its Capital Replacement Project. The applicant proposed in this project to construct facility improvements that are intended to allow the facility to operate at capacity throughout the useful life of the upgraded emission controls installed during the Subpart Cb retrofit noted above. In essence, this is a life extension project. [Information provided by applicant at a pre-application meeting with the Department July 7, 2000.] The present project will be processed as a PSD permit modification denoted as PSD-FL-011B and PSD-FL-098B.

TECHNICAL EVALUATION AND DETERMINATION

The Capital Replacement Project includes improvements throughout the facility: refurbishment of the boilers, cranes, cooling towers and feedwater pumps, upgrades of the instrumentation and controls, replacement of the water treatment system and tipping floor improvements. Of particular importance to this permitting action are the Capital Replacement Project's changes related to boiler refurbishment. All three municipal waste combustor unit boilers are proposed for refurbishment, so the emissions units addressed by this permitting action are:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
001	Municipal waste combustor unit 1
002	Municipal waste combustor unit 2
003	Municipal waste combustor unit 3

The applicant stated that the units are "electric utility steam generating units" as defined at 40 CFR 52.21(b)(31) and Rule 62-210.200(109), F.A.C., and so the applicant proposed that the facility may use the "representative actual annual emissions" methodology specified at 40 CFR 52.21(b)(33) and Rule 62-210.200(12)(d), F.A.C., to confirm that the project is not subject to the PSD requirements of 40 CFR Part 52 and Rule 62-212.400, F.A.C. Because Florida has a delegated PSD program for sources subject to the Power Plant Siting Act, the analysis of PSD applicability is to be done in accordance with federal rules, particularly 40 CFR 52.21, and the Department may rely explicitly on EPA's interpretation of its rules. The Department can also rely on its rules provided it does so in a manner that is consistent with EPA's program. In reviewing this proposed project, the Department needed to determine whether the applicant's units are electric utility steam generating units, and, if so, if the applicant has met the requirements for the representative actual annual emissions methodology.

The first issue is whether the units are electric utility steam generating units. It should be noted that the Department's present review of whether the units are electric utility steam generating units is for purposes of determining PSD applicability, not the applicability of any NSPS requirement for such units. A plain reading of the definitions noted above appears to confirm the applicant's assertion that the units meet the definition. The units are steam electric generating units which are intended to supply more than one third of the potential electrical output and more than 25 MW electrical output to a utility power distribution system for sale. However, the definitions state that the units must have been constructed for the purpose of supplying that electricity. A municipal waste combustion facility that produces steam to drive an steam turbine electrical generator, such as the applicant's facility, is arguably constructed with more than one purpose, to supply electricity and to combust solid waste (reduce its volume prior to ultimate disposal). It may not be possible to distinguish which purpose is more important as it is conceivable that the facility may not have been constructed unless revenue would be received both from the receipt of solid waste and the sale of electricity. The definitions do not exclude additional "purposes" for the units, and so do not limit consideration to only units that serve the sole purpose of supplying electricity.

EPA has not explicitly written regarding whether MWC units that use steam to generate electricity are electric utility steam generating units. EPA's interpretive rule for case-by-case MACT applicability published May 25, 2000, briefly discusses electric utility steam generating units, for a different purpose than PSD applicability. EPA actually considered this issue within the broader context of determining that combustion turbines are not electric utility steam generating units, even if they are part of a combined cycle system. EPA stated that waste heat recovery units, including duct burners, which are part of a combined cycle system are considered to be steam generating units. In making this assessment EPA relied upon the distinction that steam generating units use steam derived from the combustion of fuel to drive a "steam turbine, which in turn provides shaft power to spin an electric generator and generate electricity." [65 FR 34012.] EPA distinguished this type of electric generator from that of a turbine generator, which uses fuel to directly drive a mechanically coupled electric generator. Clearly, then, EPA

considers a steam generating unit to be an electrical generator that is driven by extracting energy from steam.

EPA limits the definition of electric utility steam generating units to those units with a minimum generating capacity, which can only be accomplished with a steam generator of a given size and inlet energy requirements, but the definition does not limit the type of boiler or fuels used to create the steam. The term "electric utility" implies that not all types of industrial or commercial facilities are included in the definitions, but the applicant's MWC units, which use steam to generate electricity for sale, appear to meet the definition. Considering the applicant's MWC units to be electric utility steam generating units seems consistent with EPA's published intent regarding the 1992 changes to the PSD program (the so called "WEPCO rule"). In the preamble to these changes, and in its discussion of Alternatives for New Source Review Applicability (part of the so called "new source review reform" proposal), EPA identified the broad criteria used to support the "representative actual annual emissions" methodology for electric utilities. (The methodology is discussed further below.) Generally, in 1992 EPA stated that it was comfortable with the 1992 changes applying to electric utilities because the source population was relatively small, the technology in use relatively uniform, public information would be available to NSR permitting authorities to help confirm future operating conditions, and federal acid rain rules required continuous monitoring or other highly accurate methods for reporting actual emissions. [57 FR 32333.] Clearly, large MWC facilities such as the applicant's, conform with this intent. Although not subject to the acid rain rules, the requirements of 40 CFR 60 Subparts Cb and Eb compel the sources to install continuous monitoring systems and perform accurate emission tests to determine actual emissions. The source population is small, with relatively uniform combustion and control technologies, especially after the implementation of Subparts Cb and Eb. EPA has recently revisited its prior analysis, in light of its belief that changes to utilities are not being reported to permitting authorities. [65 FR 39861.] In its discussion, EPA has additionally noted that electric utilities generally serve a clearly defined local market area. [65 FR 39860.] Although EPA probably intended this to refer to electric service, the applicant's facility also serves a clearly defined local area for receipt and disposal of solid waste. This analogy is important because it is a measure of the applicant's ability to forecast demand growth and future utilization of its units, and is a consideration of the permitting agency when relying on the applicant's projections. (This consideration should not be construed to broaden the scope of the applicability of the WEPCO rule beyond electric utility steam generating units to any commercial or industrial source. EPA has explicit concerns with considering forecasted demand growth in a competitive market economy. [See, for example 65 FR 39861.] The applicant's facility is municipally owned, and its projection of demand is strongly tied to its need to service the limited area of Pinellas County.) The applicant's electrical service is even more limited because it is contracted to sell its net power to one customer, Florida Power Corporation. The facility has been operated to maximize its unit availability, as evidenced by the facility's annual operation reports. As with investor owned electric utilities, public information is available to help confirm the applicant's projection of future demand and utilization, particularly with regard to demand for solid waste disposal. Solid waste reporting is required for each county by the Department's solid waste rules. Population growth data, which will have the major influence on the future demand for solid waste disposal capacity at municipally owned facilities such as the applicant's, is available from sources such as the University of Florida's Bureau of Economic and Business Research. Considering the applicant's units to be electric utility steam generating units appears to be consistent with EPA's intent regarding the WEPCO rule, and the Department considers these units to electric utility steam generating units for purposes of PSD applicability.

Because the units are electric utility steam generating units, the applicant is allowed to use the "representative actual annual emissions" methodology specified at Rule 62-210.200(12)(d), F.A.C., to confirm that the project is not subject to the PSD requirements of Rule 62-212.400, F.A.C. The second issue is whether the applicant has met the requirements for this methodology. This methodology requires

the applicant to compare actual annual emissions prior to the modification with the annual emissions projected for the two year period following the modification. EPA has written about the representative actual annual emissions methodology in both the preamble to the 1992 changes to the PSD program at 57 FR 32323-6, and in EPA Region 5's May 23, 2000 determination of PSD applicability for Detroit Edison's Dense Pack project.

As noted in the Dense Pack determination, the determination of PSD applicability is a two step process. First, the project must be a physical or operational change that is not excluded from PSD review as routine maintenance, repair or replacement of component parts. This provision is included in Florida's rules under the definition of "modification" at Rule 62-210.200(188), F.A.C., although that definition is not limited to PSD projects. The applicant has not suggested that this project in any way meets that exclusion. The project is a modification as defined by Department rule. Second, the project must result in a PSD-significant increase in emissions. The Department's rules refer to an increase in "actual emissions", which are defined at Rule 62-210.200(12)(d), F.A.C., which, as noted above, provides for the representative actual annual emissions methodology for electric utility steam generating units. Detroit Edison's Dense Pack project is similar to the applicant's project in that both projects are non-routine physical changes that are projected by the source owner to not result in post-change PSD significant emissions increases. In its review of the Dense Pack project, EPA Region 5 concluded that Detroit Edison may "lawfully avoid the major source permitting process by using the unit's representative actual annual emissions to calculate emissions following the change if the source submits information for 5 years following the change to confirm its pre-change projection." [Letter from EPA Region 5 Administrator to Detroit Edison, May 23, 2000.] This is very similar to what EPA wrote in the Federal Register that "any utility which utilizes the 'representative actual annual emissions' methodology to determine that it is not subject to NSR must submit for 5 years after the change sufficient records to determine if the change results in an increase in representative actual annual emissions." [57 FR 32325.] Although the applicant is only required to compare past actual emissions to projected actual emissions for a two year post-change period, the applicant must report post-change emissions for a five year period to confirm its projection. EPA wrote that the additional reporting is a safeguard that future significant actual emissions increases that result from the project will not go unnoticed and unreviewed. [57 FR 32325.] The applicant has proposed that actual emissions will not increase in a PSD significant manner as a result of this project, based on a comparison of past actual to representative future actual annual emissions, and has agreed to the required reporting.

At issue next is the form of any required permit conditions to ensure that the project is not subject to PSD requirements. For sources that are not eligible to use the representative actual annual emissions methodology, the Department would typically provide limits on future potential emissions in any construction permit issued for a modification of an emissions unit. Such limits would be emission limits, which are firm, federally-enforceable limits on future potential emissions. For sources using the representative actual annual emissions methodology, EPA has written that such emission limits are not required. In fact, EPA stated that the only requirement is for "tracking and monitoring post-change utilization and/or emissions levels at the unit to confirm that baseline emission levels are not exceeded as a result of the change." [57 FR 32325.] Although not clear in the cited text, EPA intended that the test be that emissions increases not equal or exceed the PSD significance criteria. EPA wrote that "the intent is to confirm the utility's initial projections rather than annually revisiting the issue of NSR applicability. If however, the reviewing authority determines that the source's emissions have in fact increased significantly over baseline levels as a result of the change, the source would become subject to NSR requirements at that time." [57 FR 32325.] EPA further clarified in the Dense Pack determination that the trigger for PSD review would also include failure to report the required information: "If Detroit Edison fails to comply with the reporting requirements ... it will be required to obtain a PSD permit for the Dense Pack project." [Detroit Edison Applicability Determination Detailed Analysis, undated]

(presumably May 23, 2000).] Thus, the requirement to track and report actual emissions is an “applicability requirement” rather than an emission limit.

Another issue to be considered is that certain emission increases, those not caused by the change, are not included in the future actual emissions. EPA referred to this as the “causation provision” in the 1992 preamble, where EPA wrote, “where projected increased operations are in response to an independent factor, such as demand growth, which would have occurred ... even in the absence of the physical or operational change, the increased operations ... may be excluded from the projection of the unit’s future actual emissions.” [57 FR 32327.] As noted in the Dense Pack determination, “[i]n projecting post-change emissions, Detroit Edison does not have to include that portion of the unit’s emissions which could have been accommodated before the change and is unrelated to the change, such as demand growth.” [Letter from EPA Region 5 Administrator to Detroit Edison, May 23, 2000.] EPA did clarify that increased emissions resulting from efficiency improvements that occur directly because of the project that cause the unit(s) to be utilized more, are not to be excluded from actual emissions: “If efficiency improvements are the predominant cause of the change in emissions and demand growth is not, the exclusion does not apply.” [57 FR 32327.] The applicant in this project did not include a projection for demand growth or other independent factors that may increase operations and future emissions. The applicant noted that little demand growth for solid waste disposal is expected beyond the nominal one percent population growth rate that Pinellas County is experiencing. [Discussion with R. Peter Stasis, P.E., of Pinellas County Utilities, pre-application meeting, July 7, 2000.] Independent confirmation of the potential demand growth can be found from the University of Florida’s Bureau of Economic and Business Research, which has noted that Pinellas has the fifth largest population in Florida, and its potential for growth is leveling out. [UF Bureau of Economic and Business Research, www.napa.ufl.edu/99news/pop99.htm] The university’s 1997 forecasted population for Pinellas County is 905,933 in 2000 and 1,018,919 in 2020, an annual growth rate of less than 1%. [www.napa.ufl.edu/98news/populati.htm#table] The region served by Florida Power Corporation, which receives the electric power from the applicant, is growing at a faster average rate, so demand growth for electric power may be a factor. [ibid.] The applicant is entitled to exclude any actual emissions increase attributable to factors independent of the project, but the applicant must support such exclusion in its future reports. The applicant has not represented that the current project will increase utilization of the units, in and of itself.

The recently completed Subpart Cb retrofit changes are expected to reduce actual emissions from the units (substantially for many pollutants such as dioxin and acid gases) as compared to emissions prior to the retrofit. Because of this, the Department required that the applicant use actual emissions after completion of the retrofit changes for the purposes of determining PSD applicability to this project. The applicant proposed to use the continuous emission monitoring system (CEMS) data to estimate actual annual emissions of the pollutants monitored by the CEMS: NO_x, SO₂, and CO. The applicant proposed to use data from all post-retrofit compliance test(s) to estimate actual annual emissions of other pollutants not monitored by the CEMS: PM/PM₁₀, lead, mercury, dioxins, hydrogen chloride. The CEMS data will also be used to determine unit availability, which is a factor the applicant will use in making its actual annual emissions estimates. The applicant proposed to use the CEMS data starting from June 1, 2000 until the start of construction of the Capital Replacement Project’s boiler refurbishment. The starting date of June 1 was selected by the applicant to provide for sufficient time from completion of the retrofit project for the units to have begun normal operation. The applicant intends to begin construction of the Capital Replacement Project’s boiler refurbishment in the fall of 2001. This will provide for twelve or more months of CEMS data, and one or two series of compliance tests, for estimating actual annual emissions. Normally, two years of actual emissions data are required for PSD purposes, but Rule 62-210.200(12)(a), F.A.C., provides for the Department to allow the use of a different time period upon a determination that it is more representative of normal operation of the emissions unit. In this case, where the Department is requiring post Subpart Cb retrofit emissions data, the Department is authorizing the use

TECHNICAL EVALUATION AND DETERMINATION

of less than two years of data to determine past actual emissions. The applicant has proposed to use the same methodology to determine future actual emissions following the Capital Replacement Project.

As mentioned above, the CEMS will also be used to document availability of the units. Unit availability is a factor in determining actual emissions. EPA stated that actual emissions should be calculated as the product of hourly emissions and capacity utilization (unit availability). [See, for example, EPA's preamble to the 1992 PSD program changes, 57 FR 32323.] Average availability of the units, determined from the operating hours reported annually by the applicant for 1990 through 1999, was about 81.7%, with a standard deviation of about 4%. The applicant reported that for the period of June 1-July 31, 2000, availability of the units was about 89.8%. It is not surprising that unit availability would increase as a result of the Subpart Cb retrofit project. The units date from the early- to mid-1980s. The units were equipped with combustion controls and electrostatic precipitators that were placed in service when the units were first constructed. The applicant reported that operational problems with the ESPs, such as transient field failures, increased as the units aged. [Telephone call with Don Elias, October 19, 2000.] The retrofit project included a new distributive control system that allowed for quicker response to changes in operating parameters, as well as new advanced emission control equipment, including baghouses which replaced the ESPs. These modernized facilities will allow the units to operate in a more stable manner, with less transient failures, with longer periods of time between planned outages. The averaging period proposed by the applicant will be long enough to include planned outage periods. The applicant expects that with the longer averaging time, unit availability will fall somewhat from 89.8% to about 86%, and the Department does not find fault with this assessment. [Memo from Don Elias, October 19, 2000.]

The applicant did provide a "baseline" estimate of actual emissions and a projection of future actual emissions based on the CEMS data available from June 1 through July 31, 2000. As discussed above, the applicant will revise this estimate based on the complete data available from June 1 until the start of construction of the Capital Replacement Project's boiler refurbishment, to provide for the longest possible period for gathering representative data. At that time, the applicant will also revise its estimate of representative future actual annual emissions. The applicant estimated that any emissions increases associated with this project will not exceed the PSD significance criteria. Based on the limited data to date, emissions are estimated by the applicant as follows in tons per year:

Pollutant	Current Actual Emissions ¹	Rep. Future Actual Emissions	Net Increase	PSD Significance	Subject to PSD?
PM/PM ₁₀	47	71/61	24/14	25/15	No
SO ₂	85	124	39	40	No
NOx	1691	1730	39	40	No
CO	118	217	99	100	No
Pb	0.25	0.84	0.59	0.6	No
Hg	0.23	0.32	0.09	0.1	No
MWC Organics Total PCDD/F	9.8 x 10 ⁻⁵	10.1 x 10 ⁻⁵	3.0 x 10 ⁻⁶	3.5 x 10 ⁻⁶	No
MWC Acid Gases HCl & SO ₂	239	278	39	40	No

¹ Current actual emissions are after completion of the Subpart Cb retrofit construction. Representative future actual emissions are estimated for the two years following completion of the Capital Replacement Project's boiler refurbishment construction.

In summary, the applicant's proposed Capital Replacement Project is a non-routine physical change that is a modification as defined by Department rule. Because the affected emissions units are electric utility steam generating units, the applicant may lawfully avoid PSD preconstruction review by using the unit's representative actual annual emissions to calculate emissions following the modification. The Department has determined that past actual emissions in this case will be the post-Subpart Cb retrofit emissions. The applicant contends that representative actual annual emissions following the Capital Replacement Project will not be significantly greater than its past actual emissions. Therefore, the applicant may avoid major PSD permitting to the extent it documents its actual emissions and submits information following the modification to confirm its projection.

The proposed project is subject to preconstruction review requirements under the provisions of Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The existing facility is located in an area designated, in accordance with Rule 62-204.340, F.A.C., as attainment or unclassifiable for the criteria pollutants ozone, PM₁₀, carbon monoxide, SO₂, nitrogen dioxide and lead. This facility is classified as a Major or Title V Source of air pollution because emissions of at least one regulated air pollutant exceeds 100 tons per year (TPY). At this facility potential emissions of PM/PM₁₀, NO_x, SO₂, CO and VOC exceed 100 TPY.

This facility is within an industry included in the list of the 28 Major Facility Categories per Table 62-212.400-1 of Chapter 62-212, F.A.C. Because emissions are greater than 100 TPY for at least one criteria pollutant, the facility is also an existing Major Facility with respect to Rule 62-212.400, Prevention of Significant Deterioration (PSD). As noted above, the applicant has proposed that the net increase in emissions of PM/PM₁₀, NO_x, SO₂, CO and VOC will not exceed the PSD significance levels of Table 212.400-2, F.A.C. Therefore this project is not subject to PSD requirements of Rule 62-212.400, F.A.C., for these pollutants.

40 CFR 60.14 defines a modification for purposes of federal New Source Performance Standards to include a change to an existing facility that increases the emission rate of any pollutant, where such rate is defined by that section to be in units of kg/hour. The Capital Replacement Project is not intended to increase the physical capacity of the emissions units, and so will not result in an increase in the short-term emission rates of any pollutant from the emissions units. Therefore, the project is not a modification as defined by the federal rules. The Capital Replacement Project does not constitute a reconstruction project as defined at 40 CFR 60.15 because the capital cost for the project of \$35 million does not exceed 50% of the fixed capital cost of a new facility, which are estimated to be \$290 million for the portions of the MWC units regulated by the NSPS Subpart Eb. The applicant also estimated total maintenance costs, excluding costs associated with the Subpart Cb retrofit, for the regulated portions of the MWC units over the life of the facility at \$31.5 million. When these costs are added to the costs of this project, the total costs are 23% of the comparable new construction costs, still less than half of the value that is considered reconstruction per federal rule. (All figures are in year 2000 dollars.) Thus, this project is not subject to any federal New Source Performance Standard.

This project is not subject to any unit specific requirements under state rule. The applicant is required to obtain this permit modification for this project because it is a modification as defined by Rule 62-210.200(188), F.A.C., and construction permits are required for modifications pursuant to Rules 62-4.030, 62-210.300(1)(a) and 62-212.300(1)(a), F.A.C.

4 SOURCE IMPACT ANALYSIS

An impact analysis was not required for this project because it is not subject to the requirements of PSD for PM/PM₁₀, NO_x, SO₂, CO and VOC.

5 BACT ANALYSIS AND DEPARTMENT'S DETERMINATION

A BACT determination was not required because this project is not subject to the requirements of PSD for PM/PM₁₀, NO_x, SO₂, CO and VOC. If the Department determines during the reporting period that the project is subject to PSD, BACT will be required at that time. As is required for any BACT determination, at that time the BACT determination shall not result in allowable emissions that are less stringent than those of the applicable NSPS requirements of 40 CFR 60, Subpart Eb, the NSPS for "new" large municipal waste combustors.

6 EXCESS EMISSIONS

The PSD permit modification for this project will not revise any existing requirements or provisions regarding excess emissions at these units. The Department expects the applicant to include excess emissions, to the extent quantifiable, in its calculation of actual emissions.

7 PRELIMINARY DETERMINATION

Based on the foregoing technical evaluation of the application and additional information submitted by the applicant and other available information, the Department has made a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations. The Department's preliminary determination is to issue the draft permit modification to allow construction of the Capital Replacement Project, subject to the terms and conditions of the draft permit modification.

The permit modification for this project authorizes construction of the Capital Replacement Project, but imposes the record keeping and reporting requirements noted above. As discussed above, these requirements establish an applicability limit, so that if representative future actual emissions increase, or if the applicant fails to comply with the reporting requirements, the applicant will be required to undergo PSD review for the Capital Replacement Project.

8 FINAL DETERMINATION

^DRAFT (This section will be revised when a final permit is issued for this project.)

DETAILS OF THIS ANALYSIS MAY BE OBTAINED BY CONTACTING:

Joseph Kahn, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114

Memorandum

Florida Department of Environmental Protection

TO: Clair Fancy

THRU: Al Linero *AL* 10/30

FROM: Joe Kahn *JK*

DATE: October 30, 2000

SUBJECT: Pinellas County Resource Recovery Facility
DEP File No. 1030117-003-AC, PSD-FL-011B and PSD-FL-098B
Modification of PSD Permits PSD-FL-011A and PSD-FL-098A

Attached for approval and signature is the intent to issue for an air construction permit modification. The applicant, Pinellas County Utilities, applied on August 30, 2000, for a modification to PSD permit numbers PSD-FL-011A and PSD-FL-098A for its Pinellas County Resource Recovery Facility. The modification is to authorize construction of its Capital Replacement Project. The applicant proposed in this project to construct facility improvements that are intended to allow the facility to operate at capacity throughout the useful life of the upgraded emission controls installed during the Subpart Cb retrofit noted above.

I recommend your approval and signature.

October 30 is day 38 of the 90 day timeclock.

Attachments

/jk



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

P.E. Certification Statement

Pinellas County Utilities
Pinellas County Resource Recovery Facility

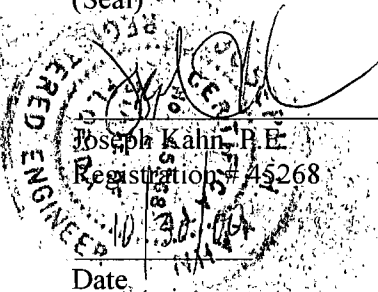
DEP File No.: 1030117-003-AC
Facility ID No.: 1030117

Project: Air Construction/PSD Permit Modification, PSD-FL-011B & -098B

I HEREBY CERTIFY that the engineering features described in the above referenced application and related additional information submittals, if any, 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).

This review was conducted by me.

(Seal)



Date

Permitting Authority:

Florida Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
New Source Review Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Telephone: 850/488-0114
Fax: 850/922-6979

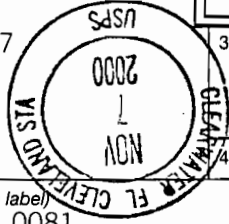
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 Mr. Pick Talley
 Director of Utilities
 Pinellas County Utilities
 PO Box 1780
 Clearwater, FL 33757



2. Article Number (Copy from service label)
 7099 3400 0000 1453 0081

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A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature
 X *[Signature]* Agent
 Addressee

D. Is delivery address different from item 1?
 If YES, enter delivery address below: Yes
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3. Service Type
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 Registered Return Receipt for Merchandise
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4. Restricted Delivery? (Extra Fee) Yes

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 Mr. Pick Talley, Director of Utilities

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Return Receipt Fee (Endorsement Required)	
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Total Postage & Fees	\$

Pinellas County

Postmark
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Name (Please Print Clearly) (to be completed by mailer)
 Mr. Pick Talley
 Street, Apt. No., or PO Box No.
 PO Box 1780
 City, State, ZIP+4
 Clearwater, FL 33757

MEMORANDUM

RECEIVED

OCT 23 2000

TO: Joe Kahn

FROM: Donald F. Elias *DFE*

DATE: October 19, 2000

SUBJECT: Unit Availability at the Pinellas County Resource Recovery Facility



The Emission Guidelines (Subpart Cb) improvements on the Pinellas County Resource Recovery Facility had a very beneficial effect on unit availability. Unit availability increased after these improvements for a variety of reasons, including the increased reliability of the pollution control system (i.e., there were fewer occasions where load needed to be reduced due to tripped fields in the ESPs) and greater emphasis on perfecting the operation and maintenance of the facility. Further, work was performed on the furnace and the interconnects to improve combustion in the furnaces and minimize emissions of CO and organic pollutants. Considerable attention was given to these components of the facility to ensure the Subpart Cb limits for dioxin and other pollutants would be achieved. In addition, a new Distributive Control System (DCS) was installed, which allowed closer monitoring and quicker response to changes in operating parameters. Operational personnel were trained and certified using ASME procedures, as required by the Emission Guidelines. The combination of these factors, and increased management attention, has caused a significant increase in unit availability. Since the 89.83% presented in the original application from the first two month's CEM data are from a short period, we are proposing to utilize the data available from June, 2000 up until construction starts. This will allow a full year of data, at a minimum, to determine representative unit availability. Based on the initial four month period of June through September, which included a two-week planned outage for service on one of the units, the overall unit availability was approximately 86%. We feel that this is in the range where the final annual average will occur.

I hope this clarifies the availability issue for you. Should you require any additional information, please feel free to contact Donald F. Elias, of RTP Environmental Associates, Inc. at (732) 968-9600.

cc: R. Larson/P. Stasis/R. Menke/T. Porter/M. Killeen/R. Henson/L. Koon/S. Reinhart
 D. Dee, Esq./W. Corbin/Proj. File: PCRRF4
B. Thomas, SWP, EPA, NPS



RTP ENVIRONMENTAL ASSOCIATES INC.

AIR • WATER • SOLID WASTE CONSULTANTS

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

(732) 968-9600

LETTER OF TRANSMITTAL

TO Mr. Joe Kahn
Florida Dept. of Environmental Protection
111 South Magnolia
Tallahassee, FL 32301

Date: 10-16-00 Proj. ID: PCRRF4

WE ARE SENDING YOU: [X] Attached [] Under separate cover
VIA: [] 1st Class Mail [X] Federal Express [] Hand Delivery [] Other
THE FOLLOWING ITEMS: a.m.

Table with 4 columns: Copies, Date, No., Description. Contains one entry for 'Revised Tables and Pages for the Pinellas County Resource Recovery Facility.' and a 'RECEIVED' stamp dated OCT 17 2000 from the BUREAU OF AIR REGULATION.

THESE ARE TRANSMITTED AS CHECKED BELOW:

- For approval, For review and comment, Resubmit ___ copies for approval, For your use, Copies returned after loan, For signature, As requested, Returned for corrections

REMARKS: Joe, Here are the revised pages we discussed. Thanks for the help, [Signature]

COPY TO: W. Eoe bin

SIGNED: [Signature]

If enclosures are not as noted, kindly notify us at once.



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October 16, 2000

Mr. Joseph Kahn
Florida Dept. of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

OCT 17 2000

BUREAU OF AIR REGULATION

Dear Mr. Kahn:

During a review of CEM data for the Pinellas County Resource Recovery Facility (PCRRF), we discovered two errors in our previous submittals for an amendment to PSD Permits PSD-FL-011(A) and PSD-FL-098(A) for the Capital Replacement Project (CRP). The correct CEM average CO and NO_x concentration for June through July from Unit 2 should be 21.1 and 192.7 ppm_{dv} at 7% O₂, respectively (not 12.1 and 192.18 ppm_{dv} at 7% O₂), as shown on the attached, corrected October 13th letter from Wheelabrator Pinellas. This results in estimated current actual annual emission rates for CO and NO_x of 118 and 1691 tons/year, respectively (not 102 and 1687 tons/year).

Therefore, please find attached:

- (1) corrected page 3 and the following attachments to Pinellas County's August 30, 2000 letter from Pick Talley to the Department: corrected August 16th letter (now dated October 13th) from Wheelabrator Pinellas to Donald Elias and the table "*Calculations of Actual Facility Emissions*"; and
- (2) corrected table "*Calculations of Current Actual Emissions for Pinellas County RRF*" attached to Pinellas County's September 20, 2000 letter from Pick Talley to the Department.

The corrections have been *bolded/italicized* to assist in your review. If you have any further questions, please feel free to contact me at the above number.

Sincerely,

RTP ENVIRONMENTAL ASSOCIATES, INC.

Donald F. Elias
Principal

cc: P.Talley/P.Stasis/W.Smith, Pinellas County; R.Larson, HDR
D.De, Esq., Landers & Parsons; R.Henson/S.Reinhart/M.Killeen/T.Porter, Wheelabrator
B. Thomas, SWD - EPA, NPS

Past actual emissions for most of the "contemporaneous" period (i.e., the past five years) reflect facility emissions with electrostatic precipitator (ESP) control of particulate matter (PM) only. The recent air pollution control (APC) improvements required by the EG replaced the ESPs with spray dry absorbers (SDA) for acid gas control, fabric filter (FF) baghouses for improved PM control, selective noncatalytic reduction (SNCR) systems for NO_x control, and powdered activated carbon injection systems (PACIS) for mercury control. This has resulted in a significant reduction in actual emissions of all PSD pollutants other than uncontrolled combustion-related pollutants like CO^a.

The amount of actual facility emissions data reflecting the current SDA/FF/SNCR/PACIS configuration on all three MWCs is extremely limited since the final MWC (Unit No. 1) only recently completed the initial EG compliance test with the new APC equipment in late May 2000. Attached are the most recent CEM data for NO_x, SO₂, and CO which average to **191.5**, 6.9, and **22.0** ppmdv corrected to 7% O₂, respectively, for all three MWC units. The CEM data represent the first two full months (June 1st-July 31st) of facility operation with all three MWCs simultaneously operating under the EG standards. Using the average flow rate of 104,233 dscfm corrected to 7% O₂ for the most recent dioxin tests^b and the overall unit average availability of 1315.1 hours/unit during the period of CEM data, equivalent long-term ton/year emissions were calculated as shown on the attached table. Similarly, available stack test measurements for the current APC configuration were reviewed and equivalent tpy emissions were calculated, again based on the unit availability during the period of CEM data. Due to the extremely limited amount of data, worst-case stack test averages (in lb/hr) were used. These PM, lead, mercury, PCDD/F, and MWC acid gas (HCl) measurements of current actual facility emissions are included on the attached table.

Based on the current actual emissions data and the PSD significance levels, future actual emissions will be limited to the annual emission levels shown on the attached table. At this time, the calculation of future emissions on the attached table does not consider allowable emissions increases due to demand growth. As can be seen, the pollutant with the smallest percentage increase in allowable actual emissions is NO_x. This pollutant is expected to be "controlling" in terms of being the most restrictive to future operations. By comparison, the PSD significance levels for SO₂, CO, and Pb are a large fraction of current actual emissions and compliance is readily expected with future allowable actual emission levels. Since the CRP improvements will take time to implement, current actual emission estimates may be refined based on future information. After the CRP improvements are constructed, future actual emissions will be tracked for up to five years to document that no increase in actual emissions greater than the PSD significance levels occurred.

^aSince the EG improvements were mostly adding pollution control equipment, no change in uncontrolled combustion-related pollutant emissions would be expected.

^bDioxin stack tests are used to establish MWC operating loads for future operations and are generally the longest overall stack tests in length of time, providing the most representative flow rate measurements for calculating emission rates.



WHEELABRATOR PINELLAS INC.
A WASTE MANAGEMENT COMPANY

3001 110th Avenue N.
St. Petersburg, FL 33716-2002
(727) 572-9163
(727) 572-4370 Fax

October 13, 2000

Donald Elias
RTP Environmental
239 US Highway 22 East
Green Brook, New Jersey 08812

Dear Don:

Revised October 13, 2000.

The following table summarizes the average steam flow, NO_x, CO, and SO₂ at the Pinellas County Resource Recovery Facility (PCRRF) for all three boilers (Unit 1, 2, and 3):

Boiler	Steam Flow (klbs/hour)	Unit On Line (minutes)	NO _x (ppmdv @ 7% O ₂)	SO ₂ (ppmdv @ 7% O ₂)	CO (ppmdv @ 7% O ₂)
Unit 1	203.8	83,561.7	190.55	10.3	35.1
Unit 2	192.6	73,865.2	192.7	6.28	21.1
Unit 3	197.5	79,282.7	191.36	4.19	9.7

Please note these averages are from 00:00 on 6/1/00 to 23:59 on 7/31/00 CEMS time at the PCRRF (CEMS time remains at Eastern Standard Time). This information is from the ESC computer system. All of which are from the 24-hour report channels.

If you require any further information or have any questions, please feel free to give me a call at (727) 572-9163 x25.

Sincerely,

Steve Reinhart
EH&S Director

Cc: Ron Larson; HDR
Tim Porter, Matt Killeen, Robert Henson; Wheelabrator

Revised October 16, 2000

CALCULATIONS OF ACTUAL FACILITY EMISSIONS

Pollutant	Current Actual Emissions (tpy)	PSD Significance Levels (tpy)	Trigger Level for Future Actual Emissions (tpy)
NO _x	1691	40	1731
SO ₂	85	40	125
CO	118	100	218
PM/PM ₁₀	47	25/15	72/62
Pb	0.25	0.6	0.85
Hg	0.23	0.1	0.33
MWC Organics (Total PCDD/F)	9.8e-05	3.5e-06	1.0e-04
MWC Acid Gases (HCl+SO ₂)	239	40	279

**CALCULATIONS of
CURRENT ACTUAL EMISSIONS
for PINELLAS COUNTY RRF**

Revised October 16, 2000

Information from Wheelabrator Pinellas Inc. August 16, 2000 (revised October 13, 2000) letter:

Average Stack Concentrations (ppmdv at 7% O₂) from CEM data:

NO _x :	$(190.55 + 192.7 + 191.36)/3 =$	191.5 ppmdv at 7% O₂
SO ₂ :	$(10.3 + 6.28 + 4.19)/3 =$	6.9 ppmdv at 7% O ₂
CO:	$(35.1 + 21.1 + 9.7)/3 =$	22.0 ppmdv at 7% O₂

June-July 2000 Operating Rates (percent of available hours):

Unit 1:	$83,561.7 \text{ min}/(60 \text{ min/hr})/(1464 \text{ hrs}) =$	95.13%
Unit 2:	$73,865.2 \text{ min}/(60 \text{ min/hr})/(1464 \text{ hrs}) =$	84.09%
Unit 3:	$79,282.7 \text{ min}/(60 \text{ min/hr})/(1464 \text{ hrs}) =$	<u>90.26%</u>
Average:		89.83%

Information from Calendar Year 2000 Stack Tests:

Flowrates (dscfm at 7% O₂) during PCDD/F Stack Tests:

Unit 1:	$(142,100 \text{ dscfm})(20.9\%-10.2\%)/(20.9\%-7\%) =$	109,386 dscfm at 7% O ₂
Unit 2:	$(134,400 \text{ dscfm})(20.9\%-9.8\%)/(20.9\%-7\%) =$	107,327 dscfm at 7% O ₂
Unit 3:	$(118,800 \text{ dscfm})(20.9\%-9.6\%)/(20.9\%-7\%) =$	<u>96,578 dscfm at 7% O₂</u>
Average:		104,430 dscfm at 7% O ₂

Emission Calculations:

Actual Emission Rates (tons/year) for CEM Pollutants:

NO _x :	$(191.5 \text{ ppmdv})(104430 \text{ dscfm})(46 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	1691 tons/year
SO ₂ :	$(6.9 \text{ ppmdv})(104430 \text{ dscfm})(64 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	85 tons/year
CO:	$(22.0 \text{ ppmdv})(104430 \text{ dscfm})(28 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	118 tons/year

Actual Emission Rates (tons/year) for non-CEM Pollutants (see table below):

PM:	$(3.94 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	47 tons/year
Pb:	$(0.0208 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	0.25 tons/year
Hg:	$(0.0197 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	0.23 tons/year
PCDD/F:	$(8.33\text{E-}6 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	9.8E-5 tons/year
HCl:	$(13.0 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	153 tons/year

Actual Emission Rates (tons/year) for "Combined" Pollutants:

MWC Acid Gases:	$(85 \text{ tons-SO}_2/\text{year})+(153 \text{ tons-HCl}/\text{year}) =$	238 tons/year
-----------------	---	---------------

1998-2000 Stack Test Measurements (lbs/hr)						
Pollutant	Unit 1		Unit 2		Unit 3	
	May 2000	Sept 1999	May 2000	Dec 1998	Sept 1999	May 2000
PM	0.52	3.94	0.78	0.46	1.13	2.47
Lead	0.00108	0.02078	0.000684	0.00135	0.00262	0.00994
Mercury	0.00588	0.00915	0.00293	0.0197	0.00374	0.00376
PCDD/F	2.12e-07	3.19e-06	1.19e-06	8.33e-06	4.18e-06	1.60e-06
HCl	10.2	12.5 ^a	7.1	13.0 ^a	10.2 ^a	5.8

^aBased on the average HCl concentration (ppmdv at 7% O₂) and the average flowrate and oxygen content during the PCDD/F stack test (dscfm at 7% O₂) for the same unit and year.



RTP ENVIRONMENTAL ASSOCIATES INC.

AIR • WATER • SOLID WASTE CONSULTANTS

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

(732) 968-9600

LETTER OF TRANSMITTAL

TO Mr. Joe Kahn
Florida Dept. of Environmental Protection
111 South Magnolia
Tallahassee, FL 32301

Date: 10-16-00 Proj. ID: PCRRF4

WE ARE SENDING YOU: [X] Attached [] Under separate cover

VIA: [] 1st Class Mail [X] Federal Express [] Hand Delivery [] Other

THE FOLLOWING ITEMS: a.m.

Table with 4 columns: Copies, Date, No., Description. Row 1: 1, 10-16-00, [], Revised Tables and Pages for the Pinellas County Resource Recovery Facility. Includes 'RECEIVED' stamp dated OCT 17 2000 and 'BUREAU OF AIR REGULATION' stamp.

THESE ARE TRANSMITTED AS CHECKED BELOW:

- For approval, For review and comment, Resubmit ___ copies for approval, For your use, Copies returned after loan, For signature, As requested, Returned for corrections

REMARKS: Joe, Here are the revised pages we discussed. Thanks for the help. [Signature]

COPY TO: W. Eoe bin

SIGNED: [Signature]

If enclosures are not as noted, kindly notify us at once.



RTP ENVIRONMENTAL ASSOCIATES INC.®

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(www.rtpenv.com)

(732) 968-9600
Fax: (732) 968-9603

October 16, 2000

Mr. Joseph Kahn
Florida Dept. of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

OCT 17 2000

BUREAU OF AIR REGULATION

Dear Mr. Kahn:

During a review of CEM data for the Pinellas County Resource Recovery Facility (PCRRF), we discovered two errors in our previous submittals for an amendment to PSD Permits PSD-FL-011(A) and PSD-FL-098(A) for the Capital Replacement Project (CRP). The correct CEM average CO and NO_x concentration for June through July from Unit 2 should be 21.1 and 192.7 ppm_{dv} at 7% O₂, respectively (not 12.1 and 192.18 ppm_{dv} at 7% O₂), as shown on the attached, corrected October 13th letter from Wheelabrator Pinellas. This results in estimated current actual annual emission rates for CO and NO_x of 118 and 1691 tons/year, respectively (not 102 and 1687 tons/year).

Therefore, please find attached:

- (1) corrected page 3 and the following attachments to Pinellas County's August 30, 2000 letter from Pick Talley to the Department: corrected August 16th letter (now dated October 13th) from Wheelabrator Pinellas to Donald Elias and the table "*Calculations of Actual Facility Emissions*"; and
- (2) corrected table "*Calculations of Current Actual Emissions for Pinellas County RRF*" attached to Pinellas County's September 20, 2000 letter from Pick Talley to the Department.

The corrections have been *bolded/italicized* to assist in your review. If you have any further questions, please feel free to contact me at the above number.

Sincerely,

RTP ENVIRONMENTAL ASSOCIATES, INC.

Donald F. Elias
Principal

cc: P.Talley/P.Stasis/W.Smith, Pinellas County; R.Larson, HDR
D.Deer, Esq., Landers & Parsons; R.Henson/S.Reinhart/M.Killeen/T.Porter, Wheelabrator
B. Stange, SWD. EPA, NPS

Past actual emissions for most of the "contemporaneous" period (i.e., the past five years) reflect facility emissions with electrostatic precipitator (ESP) control of particulate matter (PM) only. The recent air pollution control (APC) improvements required by the EG replaced the ESPs with spray dry absorbers (SDA) for acid gas control, fabric filter (FF) baghouses for improved PM control, selective noncatalytic reduction (SNCR) systems for NO_x control, and powdered activated carbon injection systems (PACIS) for mercury control. This has resulted in a significant reduction in actual emissions of all PSD pollutants other than uncontrolled combustion-related pollutants like CO^a.

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WHEELABRATOR PINELLAS INC.
A WASTE MANAGEMENT COMPANY

3001 110th Avenue N.
St. Petersburg, FL 33716-2002
(727) 572-9163
(727) 572-4370 Fax

October 13, 2000

Donald Elias
RTP Environmental
239 US Highway 22 East
Green Brook, New Jersey 08812

Dear Don:

Revised October 13, 2000.

The following table summarizes the average steam flow, NO_x, CO, and SO₂ at the Pinellas County Resource Recovery Facility (PCRRF) for all three boilers (Unit 1, 2, and 3):

Boiler	Steam Flow (klbs/hour)	Unit On Line (minutes)	NO _x (ppmdv @ 7% O ₂)	SO ₂ (ppmdv @ 7% O ₂)	CO (ppmdv @ 7% O ₂)
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Please note these averages are from 00:00 on 6/1/00 to 23:59 on 7/31/00 CEMS time at the PCRRF (CEMS time remains at Eastern Standard Time). This information is from the ESC computer system. All of which are from the 24-hour report channels.

If you require any further information or have any questions, please feel free to give me a call at (727) 572-9163 x25.

Sincerely,

Steve Reinhart
EH&S Director

Cc: Ron Larson; HDR
Tim Porter, Matt Killeen, Robert Henson; Wheelabrator

Revised October 16, 2000

CALCULATIONS OF ACTUAL FACILITY EMISSIONS

Pollutant	Current Actual Emissions (tpy)	PSD Significance Levels (tpy)	Trigger Level for Future Actual Emissions (tpy)
NO _x	1691	40	1731
SO ₂	85	40	125
CO	118	100	218
PM/PM ₁₀	47	25/15	72/62
Pb	0.25	0.6	0.85
Hg	0.23	0.1	0.33
MWC Organics (Total PCDD/F)	9.8e-05	3.5e-06	1.0e-04
MWC Acid Gases (HCl+SO ₂)	239	40	279

**CALCULATIONS of
CURRENT ACTUAL EMISSIONS
for PINELLAS COUNTY RRF**

Revised October 16, 2000

Information from Wheelabrator Pinellas Inc. August 16, 2000 (revised October 13, 2000) letter:

Average Stack Concentrations (ppmdv at 7% O₂) from CEM data:

NO _x :	$(190.55 + 192.7 + 191.36)/3 =$	191.5 ppmdv at 7% O₂
SO ₂ :	$(10.3 + 6.28 + 4.19)/3 =$	6.9 ppmdv at 7% O ₂
CO:	$(35.1 + 21.1 + 9.7)/3 =$	22.0 ppmdv at 7% O₂

June-July 2000 Operating Rates (percent of available hours):

Unit 1:	$83,561.7 \text{ min}/(60 \text{ min/hr})/(1464 \text{ hrs}) =$	95.13%
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Average:		89.83%

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Unit 2:	$(134,400 \text{ dscfm})(20.9\%-9.8\%)/(20.9\%-7\%) =$	107,327 dscfm at 7% O ₂
Unit 3:	$(118,800 \text{ dscfm})(20.9\%-9.6\%)/(20.9\%-7\%) =$	<u>96,578 dscfm at 7% O₂</u>
Average:		104,430 dscfm at 7% O ₂

Emission Calculations:

Actual Emission Rates (tons/year) for CEM Pollutants:

NO _x :	$(191.5 \text{ ppmdv})(104430 \text{ dscfm})(46 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	1691 tons/year
SO ₂ :	$(6.9 \text{ ppmdv})(104430 \text{ dscfm})(64 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	85 tons/year
CO:	$(22.0 \text{ ppmdv})(104430 \text{ dscfm})(28 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	118 tons/year

Actual Emission Rates (tons/year) for non-CEM Pollutants (see table below):

PM:	$(3.94 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	47 tons/year
Pb:	$(0.0208 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	0.25 tons/year
Hg:	$(0.0197 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	0.23 tons/year
PCDD/F:	$(8.33\text{E-}6 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	9.8E-5 tons/year
HCl:	$(13.0 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	153 tons/year

Actual Emission Rates (tons/year) for "Combined" Pollutants:

MWC Acid Gases:	$(85 \text{ tons-SO}_2/\text{year})+(153 \text{ tons-HCl}/\text{year}) =$	238 tons/year
-----------------	---	---------------

1998-2000 Stack Test Measurements (lbs/hr)						
Pollutant	Unit 1	Unit 2		Unit 3		
	May 2000	Sept 1999	May 2000	Dec 1998	Sept 1999	May 2000
PM	0.52	3.94	0.78	0.46	1.13	2.47
Lead	0.00108	0.02078	0.000684	0.00135	0.00262	0.00994
Mercury	0.00588	0.00915	0.00293	0.0197	0.00374	0.00376
PCDD/F	2.12e-07	3.19e-06	1.19e-06	8.33e-06	4.18e-06	1.60e-06
HCl	10.2	12.5 ^a	7.1	13.0 ^a	10.2 ^a	5.8

^aBased on the average HCl concentration (ppmdv at 7% O₂) and the average flowrate and oxygen content during the PCDD/F stack test (dscfm at 7% O₂) for the same unit and year.

1030117-003-AC
PSD-FL-011
PSD-FL-094



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BUREAU OF AIR REGULATION

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OCT 12 2000

BUREAU OF AIR REGULATION

October 10, 2000

Mr. Joseph Kahn
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Kahn:

As requested in your telephone conversation with RTP Environmental Associates, Inc., attached is an expanded definition of the boiler portion of the Capital Replacement Project at the Pinellas County Resource Recovery Facility that is the subject of our August 30th letter application to the Department.

As noted by the signature of the engineer below, this description is covered by the original P.E. certification for the application.

I hope the enclosed material provides the additional information that you need. Should you require any additional information or have further questions, please feel free to call Donald F. Elias at (732) 968-9600.

Sincerely,
PINELLAS COUNTY UTILITIES

Pick Talley
Pick Talley
Director

R. Peter Stasis, P.E.
Registration No. 70046220



- cc: P. Stasis/R. Larson/D. Dee, Esq./W. Smith/R. Henson/S. Reinhart/M. Killeen/T. Porter
D. Elias (all w/o drawings)
B. Shormer, SWD
EPA
NPS



***BOILER MODIFICATIONS
FOR PINELLAS COUNTY RESOURCE RECOVERY FACILITY***

October 10, 2000

The boiler modifications under this project consist primarily of the replacement of the components from the furnace gas exit to the economizer gas exit for boiler unit trains 1, 2, and 3. This includes pressure parts, such as the economizer inlet piping, inlet header, stringer tubes, intermediate header, tube elements, and outlet header. It also includes the downcomer to the evaporator inlet header and the boiler second pass through wall header, as well as evaporator and superheater headers and evaporator platens. As noted in the original description, other activities related to the Capital Replacement Project include rebuilding the refuse cranes, refurbishing the cooling tower, upgrading the instrumentation control systems, and upgrading the existing water regeneration equipment through the replacement of two independent demineralizer trains capable of producing approximately 100 gallons per minute each.

I've attached some preliminary drawings from D.B. Riley. These drawings are for information only and as such are preliminary and may undergo modification prior to final construction.



RTP ENVIRONMENTAL ASSOCIATES INC.®

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OCT 11 2000

October 6, 2000

Mr. Joseph Kahn
Florida Department of Environmental Protection
Division of Air Resource Management
2500 Blair Stone Road
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Dear Mr. Kahn:

As discussed during our conversations concerning the Capital Replacement Project for the Pinellas County Resource Recovery Facility, the facility's permit should not contain new emission limits related to the actuals to future actuals test. This issue was discussed in the promulgation of the WEPCO Rule in the July 21, 1992 Federal Register 57 FR 32324-5 (copy attached). As noted in these sections, EPA states:

The EPA does not, however, agree with comments that post change emissions estimates must always be made into permanent federally-enforceable permit conditions... Thus the intent is to confirm utility's initial projections, rather than annually revisiting the issue of NSR applicability. If, however, the reviewing authority determines that the source's emissions have in fact increased significantly over baseline levels as a result of the change, the source would become subject to NSR requirements at that time.

Therefore, instead of emissions limits, we suggest the following language for the permit amendment:

As proposed, the Capital Replacement Program will not result in a modification to a major facility as defined in F.A.C. 62-212.400(d)4(ii). To verify this determination, as noted in F.A.C. 62-210.200(12)(d), the facility shall submit to the Department on an annual basis, for a period of five years representative of normal post-change operations of the unit, within the period not longer than ten years following the change, information demonstrating that the physical or operational change did not result in a significant emissions increase. A significant increase will be

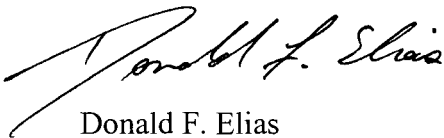
RE: Pinellas County RRF Capital Replacement Project
October 6, 2000
Page 2

defined as noted in Tables 212.400-2. This increase must be in excess of current actual annual emissions, and does not include increases resulting from demand growth. Therefore, if a significant increase does occur, then the permittee must undergo NSR at that time, if applicable.

The information you requested concerning an expanded definition of the boiler portion of the project will be sent to you under separate cover. I hope the above proves useful. Please feel free to call me at (732) 968-9600 if you would like to discuss this further.

Sincerely,

RTP ENVIRONMENTAL ASSOCIATES, INC.®



Donald F. Elias
Principal

DFE/mpj

encl.

cc: P. Stasis
R. Larson
D. Dee, Esq.
W. Smith
R. Henson
S. Reinhart
M. Killeen
T. Porter
W. Corbin
Proj. File: PCRRF4

*B. Thomas, SWD
EPA
NPS*

most appropriate policy would be to adopt a potential-to-potential test.

One commenter noted that the actual-to-future-actual test would end what was felt to be the "unlawful and unfair practice" of using the NSR program to "arbitrarily reduce allowable hours of operation or rates of production for existing sources." Countering the argument that the actual-to-future-actual test could create public health problems, two commenters noted that utilities must comply with all Federal, State and local air quality restrictions regardless of the tests used. Also supporting the actual-to-future-actual test, one commenter pointed out that source owners will be motivated by incentives in the CAA, proposed regulations, and market forces to finance and engineer economic and efficient physical and operational changes at plants so as to achieve excellent environmental control. One commenter favored calculating future emissions over a representative 2-year period within a 5-year period after the change.

3. Comments Generally Opposing the EPA Proposal

One opponent of the proposed methods stated that emission increases at power plants would now be fostered since the proposal will allow utilities to choose their own definitions for when emissions have increased.

In general, opponents of the proposal regarding the pre-change baseline noted that the change is arbitrary and capricious and that there is no analysis in the docket suggesting that any 2-year period is more representative of pre-change maximum emissions. Commenters noted that under the proposal, sources could select the years in which they had the highest emissions in an attempt to minimize the appearance of an increase and escape NSR. One commenter noted that the change in baseline calculation methodology would give utilities such flexibility in refurbishing, repowering, and life extension projects as to bias competitive power markets towards the continued use of existing old units rather than the construction of new ones.

Opponents to the use of future actual emissions stated that there is no reasoned basis for an unenforceable representative actual emissions approach, and application of this test to electric utilities is not consistent with EPA's established policy toward other sources. Other comments contended that the future actual test ignores all past precedents and that, in determining whether a change triggers NSR, EPA should compare actual emissions for the

current unit to potential emissions from the altered source; the future actual test does not guard against artificially low estimates made by sources to escape NSR, nor does it protect against substantial increases made immediately after the 2-year period; and the future actual emissions calculation procedure amounts to self-regulation and is easily subject to abuse.

State and local air agencies generally opposed the future actual method of calculating post-change emissions. One noted that the appropriate emission increase test should be determined on a case-by-case basis. One agency noted that the actual-to-future actual approach results in a significant relaxation of title I NSR requirements and would allow utilities to upgrade equipment which may have lost significant generating capacity without the equipment being subject to NSR, hampering local air quality attainment and maintenance efforts. There were several comments that future emissions cannot be reasonably determined solely on past operating history. One State noted that direction is needed on how actual versus potential emissions are estimated.

A few commenters addressed the 2-year period after the proposed change which is the basis for calculating the future actual emissions. Opponents of the future actual concept stated that use of such a provision would result in unrealistically low future emissions projections and shield a company against efforts to enforce NSR requirements at a source that increased emissions 3 years after making physical changes.

An environmental group and several State agencies noted that the projected post-change emissions should become an enforceable permit condition in order to commit a source to limit its future emissions to a specific amount and to provide assurance that these projections are reasonable estimates of expected emissions. If a source will not accept such a permit condition, then the source should have to use potential post-change emissions.

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Three commenters suggested a more flexible test for ascertaining SO₂ increases for determining applicability of NSR and NSPS requirements, namely a measure of pollution per unit of electrical output.

a. Commenters made the following specific suggestions for changes surrounding the future actual calculation method:

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(7) Consider an alternative way to make the NSR accounting system consistent, such as basing it on past allowable to future allowable emissions.

(b) Other suggestions included the following:

(1) Provide guidance on routine repair and replacement and maintenance activities to include placing units on cold reserve and bringing them back on line, and

(2) Use a 2-year period other than immediately after the change only when the EPA cannot clearly demonstrate that the 2-year period immediately following the change is not representative.

5. The EPA Analysis

The EPA has decided to promulgate the proposed "representative actual annual emissions" methodology for calculating emissions changes at electric utility steam generating units where the changes do not involve the construction of a new, "greenfield" unit or the replacement of an existing one. After a thorough review of the comments, EPA concludes that the comparison of "actual emissions before" to a projection of "actual emissions after" a physical or operational change at an existing utility steam generating unit is workable and, with the added safeguard discussed below, is the most suitable method for evaluating emissions changes at such sources.

Many commenters questioned EPA's proposed presumption that sources may use, as the baseline, emissions from any 2 consecutive years within the 5 years prior to the proposed change without regard to normal source operations. As discussed in the proposal, this presumption is consistent with EPA's decision in WEPCO and the 5-year period for "contemporaneous" emissions

increases and decreases in 40 CFR 52.21(b)(3)(i)(b).²⁰

Moreover, EPA is not reading "normal source operations" out of the regulation as charged. Rather, the presumption recognizes the nature of utility operations without compromising the existing regulatory language which requires that the pre-change 2-year period used in defining baseline emissions be representative of "normal" operations. For example, as a system a utility's "normal" operations means directly responding to a demand for electricity. A cold winter or hot summer will result in high levels of "normal" operations while a relatively mild year will produce lower "normal" operations. By presumably allowing a utility to use any 2 consecutive years within the past 5, the rule better takes into consideration that electricity demand and resultant utility operations fluctuate in response to various factors such as annual variability in climatic or economic conditions that affect demand, or changes at other plants in the utility system that affect the dispatch of a particular plant. By expanding a baseline for a utility to any consecutive 2 in the last 5 years, these types of fluctuations in operations can be more realistically considered, with the result being a presumptive baseline more closely representative of normal source operation.

The EPA disagrees with comments seeking to allow the use of any 2 consecutive years within the last 5 years of a unit's "operation" rather than the 5 years directly preceding the proposed change. A shifting of the 5-year period would be difficult to harmonize with definitions of contemporaneous contained in the regulations [see, e.g., 40 CFR 52.21(b)(3)(iii)]. This type of open-ended provision would even credit a unit which has been inoperative for 20 or 30 years or longer with a high level of emissions. The EPA notes, however, that as has always been the case under the prior regulations, any source owner or operator may request a determination that another baseline period is more representative of the unit's "normal" operations.

Several commenters opposing today's regulatory changes charged that without appropriate assurances utilities could deliberately underestimate future operations (and thus emissions) for the

purpose of avoiding review or that even where a forthright estimate is made, the forecast may prove inaccurate. The EPA is concerned that without appropriate safeguards increases in future actual emissions that in fact resulted from the physical or operational change could go unnoticed and unreviewed. For this reason, EPA has added the safeguard explained below.

The EPA does not, however, agree with comments that post-change emissions estimates must always be made into permanent federally-enforceable permit conditions. To do so would permanently restrict a utility's legally allowable emission limits to its pre-change actual emissions level unless it subsequently underwent NSR, and would fail to account for the very real possibility that emissions might increase over baseline levels in the future for reasons unrelated to the physical or operational change in question. As discussed more fully in the following section, NSR applies only where the emissions increase is caused by the change. Thus the issue should be viewed more as one of tracking and monitoring post-change utilization and/or emissions levels at the unit to confirm that baseline emission levels are not exceeded as a result of the change.

To guard against the possibility that significant increases in actual emissions attributable to the change may occur under this methodology, EPA is clarifying in the final regulations that any utility which utilizes the "representative actual annual emissions" methodology to determine that it is not subject to NSR must submit for 5 years after the change sufficient records to determine if the change results in an increase in representative actual annual emissions.²¹ Utilities may use continuous emissions monitoring data, operational levels, fuel usage data, source test results or any other readily available data of sufficient accuracy for the purpose of documenting a unit's post-change actual annual emissions.

Where the change does not increase the unit's emissions factor, i.e., the amount of pollution emitted by a source after control per unit of fuel combusted (such as pounds of SO₂ emitted per ton of coal burned), the utility may submit annual utilization data, rather than emissions data, as a method of tracking post-change emissions. If annual utilization data show that the unit

increased utilization above baseline levels, the permitting authority should determine whether the increase resulted from the change. Where a causal link exists between the change and the increase in utilization, the permitting authority should then determine whether emissions have also increased as a result of the change.

Changes that could increase a unit's emissions factor typically involve changes to the boiler itself. (Such changes do not include activities that qualify as pollution control projects under today's rule.) Where these types of changes exist, the utility should submit annual emissions data to the permitting authority. If these data suggests that the utility has increased annual emissions over baseline levels, the permitting authority should inquire whether the increase resulted from the physical or operational change. The utility may demonstrate that any increase was caused by an independent factor, such as demand growth.

Appropriate records are to be submitted to the permitting agency on an annual basis for a period of 5 years from the date the unit begins operations (i.e., post-change operations after an initial shakedown period). A longer period, not to exceed 10 years, may be required by the permitting agency where it has determined that no period within the first 5 years following the change is representative of source operations.

Since it is expected that utilities will submit the same data normally used to report emissions or operational levels under existing Federal, State or local air pollution control agency requirements, EPA does not expect that documentation of post-change actual annual emissions will impose any additional data collection burden on the part of a utility.

The purpose of this provision is to provide a reasonable means of determining whether a significant increase in representative actual annual emissions resulting from a proposed change at an existing utility occurs within the 5 years following the change. Thus the intent is to confirm the utility's initial projections rather than annually revisiting the issue of NSR applicability. If, however, the reviewing authority determines that the source's emissions have in fact increased significantly over baseline levels as a result of the change, the source would become subject to NSR requirements at that time. The EPA has adopted this approach and the time period because it believes that, in most cases, any emissions increase resulting from a physical or operational change at a utility unit would occur within the first 5 years of normal operation of the unit

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²¹ This is the only substantive change from the regulations as proposed. However, EPA has also made minor changes to the wording of some of the regulations to address problems with clarity and syntax. Since these changes are not intended to alter the meaning of the regulations, they are not individually discussed in this preamble.



ATP ENVIRONMENTAL ASSOCIATES INC.®
AIR • WATER • SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East • Green Brook, New Jersey 08812
(732) 968-9600 • FAX (732) 968-9603

Date: October 6, 2000

Fax #: (850) 922-6979

Page 1 of 5

To: Mr. Joe Kahn

From: Donald F. Elias

FDEP - Division of Air Resource Management

PROJECT NAME: PCRRF4

NOTES: Joe,

Here is the info I discussed & suggested permit language concerning the significance issue. The drawings and boiler definition should come to you from the County directly on Tuesday 10/10/00. Call if any questions. Thanks,

If you should have any questions or problems, please contact: Mary
at (732) 968-9600.



RTP ENVIRONMENTAL ASSOCIATES INC.®

AIR · WATER · SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East
Green Brook, New Jersey 08812-1909
(www.rtpenv.com)

(732) 968-9600
Fax: (732) 968-9603

October 6, 2000

Mr. Joseph Kahn
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Kahn:

As discussed during our conversations concerning the Capital Replacement Project for the Pinellas County Resource Recovery Facility, the facility's permit should not contain new emission limits related to the actuals to future actuals test. This issue was discussed in the promulgation of the WEPCO Rule in the July 21, 1992 Federal Register 57 FR 32324-5 (copy attached). As noted in these sections, EPA states:

The EPA does not, however, agree with comments that post change emissions estimates must always be made into permanent federally-enforceable permit conditions... Thus the intent is to confirm utility's initial projections, rather than annually revisiting the issue of NSR applicability. If, however, the reviewing authority determines that the source's emissions have in fact increased significantly over baseline levels as a result of the change, the source would become subject to NSR requirements at that time.

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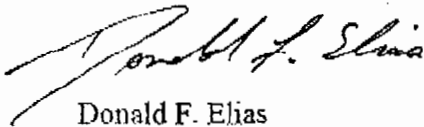
RE: Pinellas County RRF Capital Replacement Project
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Donald F. Elias
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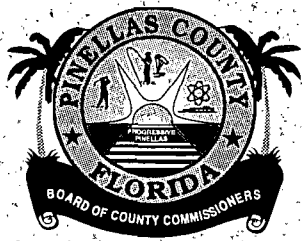
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PINELLAS COUNTY, FLORIDA

PINELLAS COUNTY UTILITIES
P.O. BOX 1780
CLEARWATER, FLORIDA 33757

RECEIVED

SEP 25 2000

BUREAU OF AIR REGULATION

September 20, 2000

Mr. Joseph Kahn
Florida Dept. of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Kahn:

As requested in your September 19 telephone conversation with RTP Environmental Associates (RTP), attached please find calculations of actual facility emissions and certification pages by the Responsible Official and a registered Professional Engineer. This information is in support of our August 30 letter application to the Department concerning the Pinellas County RRF Capital Replacement Project (CRP).

RTP previously sent a check to Ms. Patty Adams of your Division in the amount of \$250 for permitting fees. However, it was our understanding that processing the application would be performed with the monies remaining from our previous PPSA filing. If this is correct, please return the check to RTP.

We will be providing the additional information you requested for the CRP in the near future. If you have any further questions, please feel free to call Donald F. Elias at 732/968-9600.

Sincerely,

PINELLAS COUNTY UTILITIES

Pick Talley
Pick Talley
Director

cc: P. Stasis/R. Larson/D. Dee/W. Smith/R. Henson/S. Reinhart/M. Killeen/
T. Porter/D. Elias



**CALCULATIONS of
CURRENT ACTUAL EMISSIONS
for PINELLAS COUNTY RRF**

September 2000

Information from Wheelabrator Pinellas Inc. August 16, 2000 letter:

Average Stack Concentrations (ppmdv at 7% O₂) from CEM data:

NO _x :	$(190.55 + 192.18 + 191.36)/3 =$	191 ppmdv at 7% O ₂
SO ₂ :	$(10.3 + 6.28 + 4.19)/3 =$	6.9 ppmdv at 7% O ₂
CO:	$(35.1 + 12.1 + 9.7)/3 =$	19.0 ppmdv at 7% O ₂

June-July 2000 Operating Rates (percent of available hours):

Unit 1:	$83,561.7 \text{ min}/(60 \text{ min/hr})/(1464 \text{ hrs}) =$	95.13%
Unit 2:	$73,865.2 \text{ min}/(60 \text{ min/hr})/(1464 \text{ hrs}) =$	84.09%
Unit 3:	$79,282.7 \text{ min}/(60 \text{ min/hr})/(1464 \text{ hrs}) =$	90.26%
	Average:	89.83%

Information from Calendar Year 2000 Stack Tests:

Flowrates (dscfm at 7% O₂) during PCDD/F Stack Tests:

Unit 1:	$(142,100 \text{ dscfm})(20.9\%-10.2\%)/(20.9\%-7\%) =$	109,386 dscfm at 7% O ₂
Unit 2:	$(134,400 \text{ dscfm})(20.9\%-9.8\%)/(20.9\%-7\%) =$	107,327 dscfm at 7% O ₂
Unit 3:	$(118,800 \text{ dscfm})(20.9\%-9.6\%)/(20.9\%-7\%) =$	96,578 dscfm at 7% O ₂
	Average:	104,430 dscfm at 7% O ₂

Emission Calculations:

Actual Emission Rates (tons/year) for CEM Pollutants:

NO _x :	$(191 \text{ ppmdv})(104430 \text{ dscfm})(46 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	1687 tons/year
SO ₂ :	$(6.9 \text{ ppmdv})(104430 \text{ dscfm})(64 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	85 tons/year
CO:	$(19.0 \text{ ppmdv})(104430 \text{ dscfm})(28 \text{ lb/mole})(0.0025956 \text{ moles/dscf})(60 \text{ min/hr})$ $(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(10^6 \text{ ppm})/(2000 \text{ lb/ton}) =$	102 tons/year

Actual Emission Rates (tons/year) for non-CEM Pollutants (see table below):

PM:	$(3.94 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	47 tons/year
Pb:	$(0.0208 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	0.25 tons/year
Hg:	$(0.0197 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	0.23 tons/year
PCDD/F:	$(8.33\text{E-}6 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	9.8E-5 tons/year
HCl:	$(13.0 \text{ lb/hr})(8760 \text{ hrs/yr})(89.83\%)(3 \text{ units})/(2000 \text{ lb/ton}) =$	153 tons/year


Actual Emission Rates (tons/year) for "Combined" Pollutants:

MWC Acid Gases:	$(85 \text{ tons-SO}_2/\text{year})+(153 \text{ tons-HCl/year}) =$	238 tons/year
-----------------	--	---------------

1998-2000 Stack Test Measurements (lbs/hr)						
Pollutant	Unit 1	Unit 2		Unit 3		
	May 2000	Sept 1999	May 2000	Dec 1998	Sept 1999	May 2000
PM	0.52	3.94	0.78	0.46	1.13	2.47
Lead	0.00108	0.02078	0.000684	0.00135	0.00262	0.00994
Mercury	0.00588	0.00915	0.00293	0.0197	0.00374	0.00376
PCDD/F	2.12e-07	3.19e-06	1.19e-06	8.33e-06	4.18e-06	1.60e-06
HCl	10.2	12.5 ^a	7.1	13.0 ^a	10.2 ^a	5.8

^aBased on the average HCl concentration (ppmdv at 7% O₂) and the average flowrate and oxygen content during the PCDD/F stack test (dscfm at 7% O₂) for the same unit and year.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Mr. Pick Talley, Director of Utilities, Pinellas County
2. Owner/Authorized Representative or Responsible Official 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. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (727) 464-3438 Fax: (727) 464-3944
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>9/21/00</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 [], 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 [], 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 permit.

R. Stasis, P.E.

Signature

9/21/00

Date

* Attach any exception to certification statement.



RTP ENVIRONMENTAL ASSOCIATES INC.®

AIR · WATER · SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East
Green Brook, New Jersey 08812-1909
(www.rtpenv.com)

(732) 968-9600
Fax: (732) 968-9603

September 19, 2000

Ms. Patty Adams
Assistant Planner
Division of Air Resources Management
Florida Dept. of Environmental Protection
111 S. Magnolia
Tallahassee, FL 32301

Dear Ms. Adams:

Attached please find check #10139 in the amount of \$250.00. In accordance with my conversation today with Mr. Joseph Kahn, the check covers the application fee for the letter application for the Pinellas County Resource Recovery Facility dated August 30, 2000.

If you have any questions, please feel free to contact me at 732/968-9600.

Sincerely,

RTP ENVIRONMENTAL ASSOCIATES, INC.®

Donald F. Elias, Principal

DFE/WEC/wec

Attachment

cc: R.Larsen
W.Corbin
D.De, Esq.
PCRRF4 Proj.File

RECEIVED

SEP 20 2000

BUREAU OF AIR REGULATION



RTP ENVIRONMENTAL ASSOCIATES INC.

AIR • WATER • SOLID WASTE CONSULTANTS

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

(732) 968-9600

LETTER OF TRANSMITTAL

TO Ms. Patty Adams
Florida Dept. of Environmental Protection
111 South Magnolia
Tallahassee, FL 32301

Date: 09-19-00 Proj. ID: PCRRF-206

WE ARE SENDING YOU: [X] Attached [] Under separate cover
VIA: [] 1st Class Mail [X] Federal Express [] Hand Delivery [] Other
THE FOLLOWING ITEMS: a.m. delivery

Table with 4 columns: Copies, Date, No., Description. Includes a 'RECEIVED' stamp from the Bureau of Air Regulation dated SEP 20 2000.

THESE ARE TRANSMITTED AS CHECKED BELOW:

- For approval, For review and comment, Resubmit ___ copies for approval, For your use, Copies returned after loan, For signature, As requested, Returned for corrections

REMARKS: Patty, Here is the check for the Pinellas County MWC application as requested by Joe Kabin. Please call if any questions. Thanks.

COPY TO:

SIGNED: [Signature]

If enclosures are not as noted, kindly notify us at once.



"Serving You Every Day"

**BOARD OF COUNTY COMMISSIONERS
PINELLAS COUNTY, FLORIDA**

PINELLAS COUNTY UTILITIES

P.O. BOX 1780
CLEARWATER, FLORIDA 33757

RECEIVED

SEP 01 2000

BUREAU OF AIR REGULATION

COMMISSIONERS

- ROBERT B. STEWART - CHAIRMAN
- CALVIN D. HARRIS - VICE CHAIRMAN
- SALLIE PARKS
- KAREN WILLIAMS SEEL
- BARBARA SHEEN TODD

CERTIFIED MAIL

August 30, 2000

Mr. Clair H. Fancy, P.E.
 Chief, Bureau of Air Regulation
 Florida Dept. of Environmental Protection
 Twin Towers Office Building
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

Dear Mr. Fancy:

As you are aware, Pinellas County owns a nominal 3150 ton/day Resource Recovery Facility (RRF) which is operated by Wheelabrator Pinellas Inc. Pinellas County is submitting this letter application for an amendment to PSD Permits PSD-FL-011(A) and PSD-FL-098(A) for the Capital Replacement Project (CRP) as was agreed upon in your July 7, 2000 meeting with the County representatives.

Project Overview/Description

Upgrades to comply with the USEPA Emission Guidelines (EG) in 40 CFR 60 Subpart Cb have recently been completed at the facility. The Capital Replacement Project (CRP) will complete the necessary facility improvements begun with the EG upgrades. The CRP can be grouped into seven areas as shown in the attached description: boiler refurbishment, crane refurbishment, cooling tower refurbishment, instrumentation and control upgrades, feedwater pump refurbishment or replacement, tipping floor improvements, and water treatment system replacement. Only the boiler refurbishment affects the parts of the facility responsible for air emissions and is regulated directly by the Clean Air Act. The portions of the facility affected by the CRP and considered to be part of the Municipal Waste Combustors (MWC) for the New Source Performance Standard (NSPS) reconstruction purposes as described below include the boilers, cranes, and feedwater pumps.



Mr. Clair H. Fancy, P.E.
August 30, 2000
Page 2

Commencement of the CRP project is currently expected to take place in 2001. Construction activities are expected to take up to four months on each unit. Including time for acceptance testing and depending on the scheduling of unit downtimes, overall facility construction will require approximately three years.

NSPS Regulatory Applicability

The CRP will not increase the physical capacity of the facility so maximum actual short-term (i.e., lb/hr) emission rates will remain at the EG levels. Therefore, the CRP is not a "modification" for (NSPS) purposes since short-term emissions will not be increased (see 40 CFR 60.1 and 60.14).

The CRP also does not constitute a "reconstruction" for NSPS purposes. The "physical boundaries" of the municipal waste combustors (MWC, the regulated "facility" for NSPS purposes) start at the waste pit and extend through the economizer outlet as outlined at 40 CFR 60.51b and further defined by USEPA Region IV in their August 20 and December 30, 1996 letters for the City of Tampa McKay Bay RRF. The estimated capital cost of \$35 million (year 2000 dollars) for the CRP for the regulated portions of the MWC is very much less than the original facility bonds of approximately \$450 million (year 2000 dollars). Based on a generic USEPA formula (59 FR 48240), total new construction costs for the regulated portions of the MWCs would be \$290 million (year 2000 dollars). Thus, the CRP represents approximately 12% of the total cost for new construction of the regulated portions of the facility.

Since the Pinellas County RRF began operation in 1984, capital maintenance costs on the regulated portions of the MWC units, excluding EG improvements, have been about \$31.5 million (year 2000 dollars). Including these historic capital maintenance costs with the CRP costs as discussed by USEPA Region IV in their August 20 and December 30, 1996 letters for the City of Tampa McKay Bay RRF gives total capital costs of \$66.5 million, which is only 23% of new construction costs for regulated portions of the MWCs (year 2000 dollars). The CRP improvements are thus neither a "modification" under 40 CFR 60.14 nor a "reconstruction" under 40 CFR 60.15. Therefore, the CRP would not subject the facility to NSPS requirements. The facility will continue to comply with the EG requirements in 40 CFR Subpart Cb, which are reflected in the draft Title V permit.

PSD Regulatory Applicability

Since the CRP will not increase the physical capacity of the facility, no Prevention of Significant Deterioration (PSD) significant increase in actual long-term (i.e., ton per year, or tpy) emissions are expected as a result of the CRP improvements. As the CRP improvements represent like-kind replacements, the facility will be allowed to use an "actual-to-actual" test similar to the WEPCO exemption to demonstrate there is no PSD significant increase in actual emissions as was discussed in your July 7 meeting with the County representatives.

Mr. Clair H. Fancy, P.E.
August 30, 2000
Page 3

Past actual emissions for most of the "contemporaneous" period (i.e., the past five years) reflect facility emissions with electrostatic precipitator (ESP) control of particulate matter (PM) only. The recent air pollution control (APC) improvements required by the EG replaced the ESPs with spray dry absorbers (SDA) for acid gas control, fabric filter (FF) baghouses for improved PM control, selective noncatalytic reduction (SNCR) systems for NO_x control, and powdered activated carbon injection systems (PACIS) for mercury control. This has resulted in a significant reduction in actual emissions of all PSD pollutants other than uncontrolled combustion-related pollutants like CO^a.

The amount of actual facility emissions data reflecting the current SDA/FF/SNCR/PACIS configuration on all three MWCs is extremely limited since the final MWC (Unit No. 1) only recently completed the initial EG compliance test with the new APC equipment in late May 2000. Attached are the most recent CEM data for NO_x, SO₂, and CO which average to 191.4, 6.9, and 19.0 ppm_{dv} corrected to 7% O₂, respectively, for all three MWC units. The CEM data represent the first two full months (June 1-July 31) of facility operation with all three MWCs simultaneously operating under the EG standards. Using the average flow rate of 104,233 dscfm corrected to 7% O₂ for the most recent dioxin tests^b and the overall unit average availability of 1315.1 hours/unit during the period of CEM data, equivalent long-term ton/year emissions were calculated as shown on the attached table. Similarly, available stack test measurements for the current APC configuration were reviewed and equivalent tpy emissions were calculated, again based on the unit availability during the period of CEM data. Due to the extremely limited amount of data, worst-case stack test averages (in lb/hr) were used. These PM, lead, mercury, PCDD/F, and MWC acid gas (HCl) measurements of current actual facility emissions are included on the attached table.

Based on the current actual emissions data and the PSD significance levels, future actual emissions will be limited to the annual emission levels shown on the attached table. At this time, the calculation of future emissions on the attached table does not consider allowable emissions increases due to demand growth. As can be seen, the pollutant with the smallest percentage increase in allowable actual emissions is NO_x. This pollutant is expected to be "controlling" in terms of being the most restrictive to future operations. By comparison, the PSD significance levels for SO₂, CO, and Pb are a large fraction of current actual emissions and compliance is readily expected with future allowable actual emission levels. Since the CRP improvements will take time to implement, current actual emission estimates may be refined based on future information. After the CRP improvements are constructed, future actual emissions will be tracked for up to five years to document that no increase in actual emissions greater than the PSD significance levels occurred.

^aSince the EG improvements were mostly adding pollution control equipment, no change in uncontrolled combustion-related pollutant emissions would be expected.

^bDioxin stack tests are used to establish MWC operating loads for future operations and are generally the longest overall stack tests in length of time, providing the most representative flow rate measurements for calculating emission rates.

Mr. Clair H. Fancy, P.E.

August 30, 2000

Page 4

We hope this information fulfills the requirements discussed in your July 7 meeting with the County representatives. Should you have any questions, please feel free to contact Donald F. Elias of RTP Environmental Associates at 732/968-9600.

Sincerely,

PINELLAS COUNTY UTILITIES



Pick Talley

Director of Utilities

cc: P. Stasis/R. Larson/D. Dee, Esq./W. Smith/R. Henson/S. Reinhart/M. Killeen/T. Porter

B. Thomas, SWD
EPA
NPS

PINELLAS COUNTY RESOURCE RECOVERY FACILITY
CAPITAL REPLACEMENT PROJECT

1. Boiler Refurbishment

The three (3) existing resource recovery boilers at the PCRRF each consist of a Martin grate system and waterwall electric steam generating boiler which were originally supplied by D. B. Riley, Inc. These boilers, National Board Numbers NB-2603, NB-2624, and NB-2655 for Units 1, 2, and 3, respectively, were installed in 1982, 1983, and 1985. The planned project consists of replacement in kind of boiler tubes, headers, attachments and trim parts from the furnace gas exit to the economizer exit. Associated boiler gas side cleaning equipment consisting of soot blowers and rappers are also being replaced and/or relocated. Existing furnace, grate and steam drums will be retained. Casing elements and hoppers are being refurbished and/or replaced, as appropriate.

2. Refuse Crane Refurbishment

The existing refuse crane system at the PCRRF consists of three (3) independently operated overhead grapple cranes supplied by Harnishfager (P&H). The existing crane electrical and mechanical systems will be replaced with functionally similar equipment.

3. Cooling Tower Refurbishment

The existing cooling tower consists of five (5) forced draft cells constructed of wood. In order to maintain structural integrity and design performance parameters, the cooling tower will be cleaned, inspected and refurbished including installation of new fill, distribution system, replacement of mechanical equipment, fan deck, and structural framing.

4. Instrumentation and Control Upgrades

The existing plant Instrumentation and Control (I&C) systems, consisting primarily of 1970's vintage equipment, are obsolete. Upgrades to the I&C systems will consist of modernization of the Martin grate control systems and the balance of plant instrumentation and controls. Pneumatically operated control equipment will be replaced with modern digital based controls.

5. Feedwater Pumps

The existing motor and turbine driven boiler feedwater were installed in 1982 and 1985, and will be replaced and/or refurbished with functionally equivalent equipment.

6. Tipping Floor

In order to enhance safety and operability, certain improvements to minimize traffic delays and facilitate safer unloading of refuse vehicles will be undertaken. The primary means to achieve this will be additional ingress and egress provisions for vehicles to be used during peak and/or congested periods of arriving traffic.

7. Water Treatment

The existing boiler water treatment equipment consists of three (3) trains of anion and cation demineralizers. The equipment will be replaced with two (2) trains of functionally equivalent demineralizers.

CALCULATIONS OF ACTUAL FACILITY EMISSIONS

Pollutant	Current Actual Emissions (tpy)	PSD Significance Levels (tpy)	Trigger Level for Future Actual Emissions (tpy)
NO _x	1687	40	1727
SO ₂	85	40	125
CO	102	100	202
PM/PM ₁₀	47	25/15	72/62
Pb	0.25	0.6	0.85
Hg	0.23	0.1	0.33
MWC Organics (Total PCDD/F)	9.8e-05	3.5e-06	1.0e-04
MWC Acid Gases (HCl+SO ₂)	239	40	279



WHEELABRATOR PINELLAS INC.
A WASTE MANAGEMENT COMPANY

3001 110th Avenue N.
St. Petersburg, FL 33716-2002
(727) 572-9163
(727) 572-4370 Fax

August 16, 2000

Donald Elias
RTP Environmental
239 US Highway 22 East
Green Brook, New Jersey 08812

Dear Don:

The following table summarizes the average steam flow, NOx, CO, and SO₂ at the Pinellas County Resource Recovery Facility (PCRRF) for all three boilers (Unit 1, 2, and 3):

Boiler	Steam Flow (klbs/hour)	Unit On Line (minutes)	NOx (ppmdv @ 7% O ₂)	SO ₂ (ppmdv @ 7% O ₂)	CO (ppmdv @ 7% O ₂)
Unit 1	203.8	83,561.7	190.55	10.3	35.1
Unit 2	192.6	73,865.2	192.18	6.28	12.1
Unit 3	197.5	79,282.7	191.36	4.19	9.7

Please note these averages are from 00:00 on 6/1/00 to 23:59 on 7/31/00 CEMS time at the PCRRF (CEMS time remains at Eastern Standard Time). This information is from the ESC computer system. All of which are from the 24-hour report channels.

If you require any further information or have any questions, please feel free to give me a call at (727) 572-9163 x25.

Sincerely,

Steve Reinhart
EH&S Director

Cc: Ron Larson; HDR
Tim Porter, Matt Killeen, Robert Henson; Wheelabrator

PCRRF AIR POLLUTION CONTROL RETROFIT PROJECT

3095 - 114TH AVENUE NORTH
ST. PETERSBURG, FL 33716
PHONE: (727) 464-7565
FAX: (727) 464-7713

July 14, 2000


Winston Smith
Director, Division of Air, Pesticides and Toxics Management
United States Environmental Protection Agency
61 Forsyth Street SW
Atlanta, Georgia 30303

RE: Pinellas County Resource Recovery Facility

Dear Mr. Smith:

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

Sincerely,



Russell Menke
Project Administrator

Enclosure

CC:

Brian Beals, USEPA
Scott Davis, USEPA
Fred Porter, USEPA
Walt Stevenson, USEPA
Clair Fancy, FDEP
Andrew Nguyen, FDEP
Bill Thomas, FDEP
Pick Talley, Utilities Admin.
Chris Staubus, Utilities Admin.

Warren Smith, Solid Waste Operations
Pete Stasis, Utilities Engineering
Julie Scales, Senior Assistant County Attorney
David Dee, Landers & Parsons
Ron Larson, HDR Engineering
Stu Broom, Verner, Liipfert et al
Luke Koon, Wheelabrator Pinellas Inc.
Dave Patel, Stone & Webster

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

**Final Quarterly Report on Project Progress for the Second Quarter, 2000
Submitted July 14, 2000**

Overview

This Quarterly Report for the retrofit of the Pinellas County Resource Recovery Facility covers the County's activities during the second calendar quarter of 2000 on the retrofit project. The retrofit of the final unit (Unit #1) was completed, and the unit restarted, on May 5. Field compliance testing for Unit #1 was completed on June 1. In general, the County' overall progress with the retrofit activities has been in accordance with the schedule. Detailed descriptions of the efforts completed, underway and scheduled for the next quarter are presented in the following paragraphs. Because all three units are now operating in accordance with applicable environmental standards, and the remaining work consists only of sitework, paving, landscaping and completion of wind walls, this will be the last progress report issued for this project.

Actions Taken During Reporting Period

Cleaning of Boilers - Historically, water washing of boilers had been done on approximately a ten-week schedule. From August of 1995 until mid-1999, these washes have been done on approximately an eight-week schedule. During 1999 the facility operator changed the method of cleaning the boilers to using a dry, concussive boiler cleaning method in lieu of water washing. This cleaning is being done on approximately an eight-week schedule.

Stack Testing of Dioxin Emissions - Dioxin testing has been performed on an annual basis for the past several years in conjunction with annual compliance tests. In addition, dioxin testing is being performed as part of the acceptance testing for each of the retrofitted units. Field dioxin testing was completed in May for all three units, and the results will be submitted as soon as they are available.

Design of the Retrofit - Design work on the retrofit had previously been substantially completed. During the reporting period, design activities were limited to completion of "punch list" items, and design modifications to accommodate field conditions and interferences.

Procurement of Equipment and Construction Contracts - During the reporting period, one new purchase order was issued, and minor adjustments were made to existing purchase orders. Only two substantial additional purchase orders are currently planned during the remainder of the retrofit: Sitework and Roadways, and Landscaping. Purchase order commitments for balance of plant materials, equipment and services total approximately \$23.2 million.

On-Site Construction of the Retrofit - During the reporting period, construction of the new air pollution control train for Unit #1 was substantially completed, and the unit was restarted. Work was initiated on Phase IV, the final phase of the project, which involves demolition of the Unit #1 electrostatic precipitator, ID fan and stack, completion of the windwall around the new APC equipment, sitework and roadways, and landscaping. The following specific construction activities were completed during the reporting period:

Demolition

The demolition contractor mobilized, and all remaining demolition work was completed, including the Unit #1 electrostatic precipitator, the old ID fan and the old stack.

Piling

The piling contractor was mobilized, and installed the Phase IV piling for the remaining portions of the windwall.

Foundations

Phase IV foundation work was begun, and 5 pile caps were completed for the windwall.

Structural/Mechanical Erection

Phase III equipment installation was completed, including the tie-in of the new APC equipment and installation of the auxiliary burners on Unit #1.

Piping

All Phase III piping was completed.

Electrical

All Phase III electrical work was completed, including installation of the communication system.

Insulation and lagging

All Phase III insulation and lagging was completed, and the contractor demobilized. The contractor will return during Phase IV to complete the windwall.

Actions Scheduled During the Reporting Period, But Not Completed

During the reporting period, all major activities that had been scheduled to be completed have been completed.

Actions Scheduled During the Next Reporting Period

During the next reporting period, efforts will be concentrated on completion of punch list items for Unit #1, and completion of Phase IV. Phase IV work remaining consists of completion of the windwall around the new air pollution control equipment, site grading and roadways, and landscaping. Monthly meetings are being held to monitor progress and resolve design issues. Weekly on-site construction meetings are being held with contractors to monitor and coordinate activities.

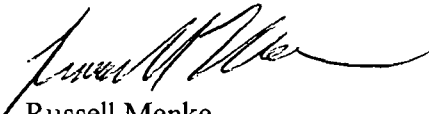
The following specific activities are expected to be completed during the next calendar quarter:

- Completion of pile caps and piers for the remaining windwall
- Erection of structural steel for the remaining windwall
- Installation of metal skin on the remaining windwall, and installation of doors
- Site grading
- Paving of remaining site roadways
- Landscaping

Site Progress Photograph

Attached is a site progress photo taken on June 20, 2000 looking toward the north. The three new air pollution control trains can be seen to the center and right side of the photo; the existing boilers are to the left. In the foreground, in the area where the old electrostatic precipitator for unit #1 was removed, can be seen the formwork for the piers for the windwall which will screen the equipment from the south.

Respectfully Submitted,



Russell Menke
Retrofit Project Administrator

Attachment: Site Photo taken June 20, 2000

AGENDA
PINELLAS COUNTY RESOURCE RECOVERY FACILITY

July 7, 2000

- I) Introduction of Project Team
- II) Description of Proposed Project
- III) Regulatory Programs
 - A) Prevention of Significant Deterioration (PSD)
 - 1) WEPCO
 - a) Like-kind replacement
 - b) Current Actual Emissions to Representative Future Actuals
 - B) New Source performance Standards (NSPS)
 - 1) Percentage Cost for Original Facility Updated to Current Dollars
 - C) Operating Permits (Title V)
 - 1) Update Permit as Completed
 - D) Power Plant Siting Act (PPSA)
 - 1) Informational Submittal
 - E) Florida Statutes Re: New and Modified MWC Facilities (Section 403.7061, Florida Statutes)
 - 1) No Increase in Capacity

