



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 30, 2011

Sent via Electronic Mail - Read Receipt Requested

Mr. Steve W. Daignault, Public Works and Utilities Services steve.daignault@tampagov.net
City of Tampa
306 East Jackson Street
Tampa, Florida 33602

Re: Second Request for Additional Information (RAI), File Number 0570127-006-AV
Title V Air Operation Permit Renewal Application
McKay Bay Refuse to Energy Facility

Dear Mr. Daignault:

Thank you for your response to our request for additional information sent on December 20, 2010, regarding the Title V air operation permit renewal application for the McKay Bay Refuse to Energy Facility, which is located in Hillsborough County at 107 North 34th Street, Tampa, Florida.

The responses related to the missing application information appear to be sufficient; however, the compliance assurance monitoring (CAM) responses are not. Even though emissions units are exempt from the CAM requirements for federal regulations established after January 1990, they remain subject to the CAM requirements for the prevention of significant deterioration (PSD)-established emissions limits, regardless of the fact that the PSD limits may be less stringent than the federal limits. The exemption from CAM for post-1990 federal standards is based on the assumption that federal rules written after 1990 would have periodic monitoring provisions built into them. While the standards in 40 Code of Federal Regulations (CFR), Subpart Cb were implemented and have been updated since 1990, it does not appear that the monitoring provisions were ever really addressed to provide adequate periodic monitoring requirements similar to the CAM requirements of 40 CFR 64.

In order to continue processing the application, the Department still needs the additional information requested below. Should a response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

1. To satisfy the intent of 40 CFR 64, CAM plans for particulate matter are required as a part of this Title V renewal permit in order to provide reasonable assurances that the control devices are maintained and operated to the same level as during the satisfactory compliance tests. Please provide the minimum pressure drop across your baghouses that corresponds to compliant particulate matter emissions rates. If the bags require a certain level of pre-coating in order to meet compliance, then this minimum pressure drop should correspond with the cleanest level to which the bags are rapped. Please also include a maximum manufacturer's acceptable pressure drop for the baghouses that assures protection of the bags and the housing from rupture due to excessive pressure. As a second indicator, the CAM plan will also include the use of the continuous opacity monitors as a monitored indicator for any sudden and sustained increases in average opacity that could indicate a failure of the bags.
2. Depending on the inlet temperature to the baghouse and the potential for vaporization, the control efficiency for removing lead could vary. CAM applicability for the controlled emissions of lead is based on potential pre-controlled emissions being greater than the Title V threshold of 5 tons per year. The RAI response compared the different emissions limits for lead, but did not include an evaluation for potential pre-controlled lead emissions. Please provide calculations clearly showing the pre-controlled emissions potential for lead. If the pre-controlled emissions potential is greater than 5 tons per year, adding a baghouse inlet temperature indicator to the particulate matter CAM plan could be considered. If this option is selected, provide the

Second Request for Additional Information

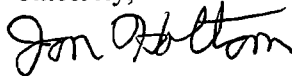
maximum demonstrated inlet temperature that assures the lead has been sufficiently condensed to be captured by the baghouses.

3. Because the PSD permit established an annual emissions limit for hydrochloric acid (HCl) that is greater than the Title V applicability threshold of 10 tons per year, the waste combustors are subject to CAM for the controlled emissions of HCl. Please provide a CAM plan that assures the scrubber operates on an hourly basis as well as it did during the satisfactory HCl compliance tests.
4. Please provide an explanation for your assumed scrubber removal efficiency for fluoride of only 90%. Research shows reports listing fluoride removal efficiencies for dry scrubbers as high as 98%. Based on the PSD limit of 6.57 tons per year, a scrubber efficiency of only 94% could result in pre-controlled emissions of fluoride above the Title V threshold of 100 tons per year. If the pre-controlled potential emissions of fluoride are above 100 tons per year, please provide a CAM plan that assures the scrubber operates on an hourly basis as well as it did during the satisfactory fluoride compliance tests.

The Department will resume processing the application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the responsible official (R.O.). Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you should have any questions, feel free to contact Yousry (Joe) Attalla, E.S.II by telephone at (850) 717-9078 or by e-mail at yousry.attalla@dep.state.fl.us.

Sincerely,



Jon Holtom, P.E.

Title V Section Program Administrator
(850) 717-9079

cc: Mr. Christopher C. Tilman, P.E., Malcolm Pirnie, Inc.: ctilman@pirnie.com
Ms. Diana M. Lee, P.E., Chief Air Permitting, Hillsborough County: lee@epchc.org
Mr. Stephen R. Hathaway, Hillsborough County: hathaways@epchc.org
Ms. Barbara Friday, DEP-BAR: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Victoria Gibson, DEP-BAR: victoria.gibson@dep.state.fl.us (for reading file)

Friday, Barbara

To: steve.daignault@tampagov.net
Cc: ctilman@pirnie.com; 'lee@epchc.org'; hathaways@epchc.org; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility
Attachments: SteveW.DaignaultMcKayBayRefuseEnergy0570127-006-AVRAI2.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, *noting that you can view the documents*, and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

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

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

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Thank you,

Barbara Friday
Division of Air Resource Management (DARM)
Department of Environmental Protection
Bureau of Air Regulation
850/717-9095
Barbara.Friday@dep.state.fl.us

Friday, Barbara

From: Microsoft Exchange
To: steve.daignault@tampagov.net
Sent: Wednesday, March 30, 2011 10:59 AM
Subject: Relayed: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

steve.daignault@tampagov.net

Subject: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Microsoft Exchange
To: ctilman@pirnie.com
Sent: Wednesday, March 30, 2011 10:59 AM
Subject: Relayed: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

ctilman@pirnie.com

Subject: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Microsoft Exchange
To: lee@epchc.org; hathaways@epchc.org
Sent: Wednesday, March 30, 2011 10:59 AM
Subject: Relayed: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

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lee@epchc.org

hathaways@epchc.org

Subject: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Hathaway, Stephen [hathaways@epchc.org]
To: Friday, Barbara
Sent: Wednesday, March 30, 2011 10:59 AM
Subject: Read: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Your message was read on Wednesday, March 30, 2011 10:59:29 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Hathaway, Stephen [hathaways@epchc.org]
Sent: Wednesday, March 30, 2011 11:07 AM
To: Friday, Barbara
Subject: RE: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Dear Barbara,

I can view the document.

Thank you,

Stephen R. Hathaway
Engineering Specialist I - Air
Environmental Protection Commission
of Hillsborough County
3629 Queen Palm Drive
Tampa, FL 33619
(813) 627-2600 Ext. 1268
(813) 627-2660 Fax

Values: Environmental stewardship, integrity, honesty, and a culture of fairness and cooperation.

From: Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]
Sent: Wednesday, March 30, 2011 10:59 AM
To: steve.daignault@tampagov.net
Cc: ctilman@pirnie.com; Lee, Diana; Hathaway, Stephen; Gibson, Victoria; Attalla, Yousry; Holtom, Jonathan
Subject: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

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Thank you,

Barbara Friday
Division of Air Resource Management (DARM)
Department of Environmental Protection
Bureau of Air Regulation
850/717-9095
Barbara.Friday@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Microsoft Exchange
To: Attalla, Yousry
Sent: Wednesday, March 30, 2011 10:59 AM
Subject: Delivered: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Your message has been delivered to the following recipients:

Attalla, Yousry

Subject: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Attalla, Yousry
To: Friday, Barbara
Sent: Wednesday, March 30, 2011 11:14 AM
Subject: Read: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Your message was read on Wednesday, March 30, 2011 11:14:08 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Holtom, Jonathan; Gibson, Victoria
Sent: Wednesday, March 30, 2011 10:59 AM
Subject: Delivered: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Your message has been delivered to the following recipients:

Holtom, Jonathan

Gibson, Victoria

Subject: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Sent by Microsoft Exchange Server 2007

/O=FLORIDADEP/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=BOUTWELL_B

From: Holtom, Jonathan
To: Friday, Barbara
Sent: Wednesday, March 30, 2011 1:33 PM
Subject: Read: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Your message was read on Wednesday, March 30, 2011 1:32:33 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Wednesday, March 30, 2011 11:18 AM
Subject: Read: Second Request for Additional Information (RAI), File Number 0570127-006-AV - McKay Bay Refuse to Energy Facility

Your message was read on Wednesday, March 30, 2011 11:18:21 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Greig Grotecloss [Greig.Grotecloss@ci.tampa.fl.us]
Sent: Thursday, March 31, 2011 9:28 AM
To: Friday, Barbara
Cc: Debra Cole; Nancy McCann; tstankunas@earthshineinc.com
Subject: Re: Second Request for Additional Information (RAI), File McKay Bay Refuse to Energy Facility Number0570127-006-AV -

We received your e-mail and were able to open it. We forwarded the RAI to our permit experts for reply.

>>> "Friday, Barbara" <Barbara.Friday@dep.state.fl.us> 3/30/2011 10:59 AM >>>

Dear Sir/Madam:

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Thank you,

Barbara Friday
Division of Air Resource Management (DARM)
Department of Environmental Protection
Bureau of Air Regulation
850/717-9095
Barbara.Friday@dep.state.fl.us

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