

CDM Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

Westshore Center
1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
Tel: 813 281-2900 Fax: 813 288-8787

September 11, 2000

Mr. Scott Sheplak, P.E.
Title V Administrator
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Subject: McKay Bay Title V Permit No. 0570127-001-AV

Dear Mr. Sheplak:

On behalf of the City of Tampa, Camp Dresser & McKee Inc. (CDM) is providing the following additional input on the Revised DRAFT Initial Title V Air Operation Permit for the McKay Bay Resource Recovery Facility (Permit No. 0570127-001-AV), received via electronic submission on August 17, 2000. We appreciate your taking the time to discuss our concerns with us on August 29, 2000. At that time, you agreed to make most of the changes requested. We are disappointed, and think it inappropriate that the Department released the Permit as proposed without our sign off and without incorporating changes previously agreed to. Our comments below, are listed by DRAFT permit condition number:

1. Section I, Subsection II, Condition 8: This Condition has been changed at the request of the Hillsborough County Environmental Protection Commission ("HCEPC") to include the requirement that ash hauling trucks be subjected to a wheel wash prior to leaving the site. Please be advised that the new ash handling configuration incorporated in conjunction with the retrofit project has no facilities for wheel washing and there is no regulatory requirement for providing such facilities. The existing ash handling procedures, which do include truck wheel washing, will be discontinued upon demolition of Emissions Units 001, and 002. We respectfully request that this new requirement for wheel wash facilities be removed.
2. Section III, Subsections A and B: Conditions A.45 and B.15 specify that Subsections A and B will become null and void in their entirety upon demolition of existing Emissions Unit Nos. 001, 002, 003, 004, and 005. Demolition of Units 003, 004, and 005 has already occurred. Demolition of Units 001, and 002, is expected to begin within the next 60 days. Accordingly, we have not conducted an in-depth review of these sections in anticipation that they will shortly become moot.
3. Section III, Subsection C, Condition C.6.1: Two new categories have been added to the list of materials that are prohibited. We are concerned that category (j), "untreated biomedical waste," may result in unnecessary confusion when assessing compliance.

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BUREAU OF AIR REGULATION

Mr. Scott Sheplak, P.E.
September 11, 2000
Page 2

The City has no intention of accepting segregated loads of the materials defined as "biomedical waste." However, many materials received in the normal municipal solid waste stream could reasonably fall within the regulatory definition, creating a non-compliant situation. As discussed, we request that the Department revisit this language so as not to impose a condition with which the Facility cannot certify compliance. We suggest the same defining language as was provided on this issue in the Hillsborough County WTE Title V permit which states: Untreated Biomedical waste from biomedical waste generators regulated pursuant to Chapter 64E-16, F.A.C., and from other similar generators (or sources)."

4. Section III, Subsection C, Condition C.32: The reference to Subpart Eb in the second line is incorrect. The appropriate reference should be Subpart Cb.
5. Section III, Subsection D, Condition D.9: Requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. As stated in our previous comments, the permit does not specify a "maximum operation rate" for this particular source. The Condition should be removed because it is not applicable.
6. Section III, Subsection D, Condition D.11: Requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit. The applicable emission limiting standard is in units of percent opacity. Process weight input or heat input data are not needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. As previously requested, this Condition should be deleted.
7. Section III, Subsection D, Condition D.14: Imposes the excess emissions and monitoring systems performance reporting requirements of 40 CFR 60.7. As stated in our previous comments, this particular emissions unit is not continuously monitored; this requirement does not apply to this emissions unit and should be deleted.
8. Section III, Subsections E and F: As discussed with Mr. Don Elias of RTP Environmental Consultants, the particulate limit for the lime and carbon silos is not associated with the RACT rules. Accordingly, the permit conditions should clearly indicate that an exceedance of 5% opacity does not constitute an emissions violation, but rather, indicates the possible need for a Method 5 particulate test.
9. Section III, Subsection E, Condition E.9: Requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. As stated in our previous comments, the permit does not specify a "maximum operation rate" for this particular source. The Condition should be removed because it is not applicable.
10. Section III, Subsection E, Condition E.12: Requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit.

Mr. Scott Sheplak, P.E.
September 11, 2000
Page 3

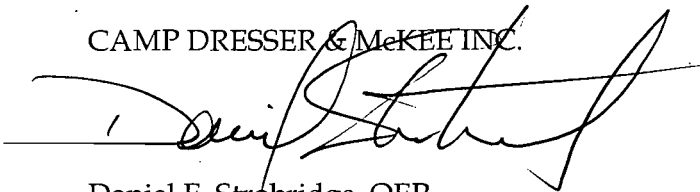
The applicable emission limiting standard is in units of percent opacity. Process weight input or heat input data are not needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. As previously requested, this Condition should be deleted.

11. Section III, Subsection F, Condition F.9: Requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. As stated in previous comments, the permit does not specify a "maximum operation rate" for this particular source. The Condition should be removed because it is not applicable.
12. Section III, Subsection F, Condition F.12: Requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit. The applicable emission limiting standard is in units of percent opacity. Process weight input or heat input data are not needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. As previously requested, this Condition should be deleted.
13. Statement of Basis: Please specify on Page 3 in the first paragraph that "emissions from the lime silos during filling operations are controlled by baghouses." Similar language should also be added to the next paragraph relating to the carbon silos.
14. Statement of Basis: Please remove the reference on Page 3 in the second paragraph to dioxin/furan. Additionally, please note that there are two silos with separate discharges for the carbon.

As we discussed on August 29, 2000, we still believe that the beryllium emissions limitation and annual testing provisions have been misapplied by the Department. As you are aware, the USEPA has confirmed that the beryllium NESHAP does not apply to Municipal Waste Combustors. That guidance alone should be sufficient to remove this testing requirement.

Very truly yours,

CAMP DRESSER & MCKEE INC.


Daniel E. Strobridge, QEP
Vice President

c: G. Grotecloss, Tampa
D. Dee, Landers and Parsons
D. Elias, RTP
W. Hooper, WMBI

9/14/00 cc: Ed Inec

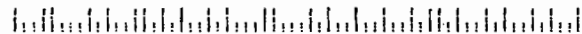
CDM

Camp Dresser & McKee Inc.

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Mr. Scott Sheplak, P.E.
Title V Administrator
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Division of Air Resources Management
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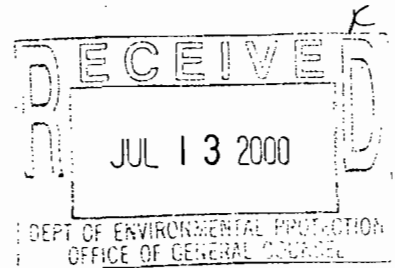
BUREAU OF AIR REGULATION
CITY OF TAMPA,

Petitioner,

v:
DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



CITY OF TAMPA'S REQUEST FOR
EXTENSION OF TIME TO FILE PETITION

Petitioner, the City of Tampa (the "City"), pursuant to Rule 28-106.111(3), Florida Administrative Code, respectfully requests the Department of Environmental Protection ("Department") to grant the City an additional extension of time to file a petition for a formal administrative hearing concerning the Department's draft Title V air operation permit for the City's McKay Bay Refuse-to-Energy Facility (DEP Permit No. 0570127-001-AV) (the "Draft Permit"). In support of this request, the City says:

1. The City is the applicant for a Title V air operation permit for the City's McKay Bay Refuse-to-Energy Facility (the "Facility"), which is located at 107 North 34th Street, Tampa, Florida.

2. On October 11, 1999, the Department distributed its "Intent to Issue Title V Air Operation Permit" and the Draft Permit for the Facility. As the applicant for the Draft Permit, the City is affected by the Department's proposed action.

3. On October 19, 1999, the City requested an extension of time to file a petition in this case. By order dated November 2, 1999, the Department granted the City's request and extended the time to file a petition to December 15, 1999. On December 15, 1999, the City requested a second extension of time to file its petition. By order dated December 20, 1999, the Department granted the City's request and extended the time to file a petition to March 15, 2000. On March 9, 2000, the City requested a third extension of time to file its petition. By order dated April 5, 2000, the Department granted the City's request and extended the time to file a petition to May 31, 2000. On June 2, 2000, the city requested a fourth extension of time to file its petition. By order dated June 16, 2000, the Department granted the City's request and extended the time to file a petition to July 14, 2000.

4. The Draft Permit is lengthy and complex. The City filed comments concerning the Draft Permit and the City is working with the Department to resolve the issues raised in its comments. The City's lead consultant, Daniel Strobridge of Camp, Dresser & McKee, Inc., is out-of-town and unavailable, so the City has not been able to determine the status of the Department's review of its comments.

5. Although the City does not expect to file a petition for a formal administrative hearing concerning the Draft Permit, the City requests a 30-day extension of time to allow the City an

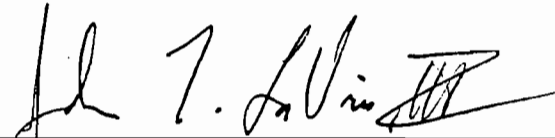
opportunity to work with the Department concerning its comments before the City waives its right to a hearing.

6. The City's counsel has attempted to discuss this request with Scott Sheplak on the Department's staff, but has been unable to reach Mr. Sheplak.

WHEREFORE, the City requests the Department to grant a 30-day extension of time to file a petition for a formal administrative hearing concerning the Draft Permit.

Respectfully submitted this 13th day of July, 2000

LANDERS & PARSONS



DAVID S. DEE
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ATTORNEYS FOR THE CITY OF TAMPA.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and one copy of the foregoing was furnished by hand-delivery to the CLERK'S OFFICE, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Room 659E, Tallahassee, Florida 32399; and a copy by U.S. Mail to Douglas Beason, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-2400, on this 13th day of July, 2000.


ATTORNEY

TO: Elizabeth Bartlett

FROM: Scott M. Sheplak, P.E. *sm*
Administrator, Title V Section

DATE: February 17, 2000

SUBJECT: Solid Waste Authority of Palm Beach County
ID Number: 0990234
North County Resource Recovery Facility

City of Tampa
ID Number 05700127
McKay Bay Refuse-to-Energy Facility

Please find enclosed the subject Title V application for your review and information. Please return the application when you are done.

If you have any questions or comments concerning this matter, please do not hesitate to call me at 850/921-9532.

SS/bjb

Enclosure



Camp Dresser & McKee Inc.

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BUREAU OF AIR REGULATION

December 20, 1999

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

VIA OVERNIGHT DELIVERY

Subject: City of Tampa McKay Bay Refuse-to-Energy Facility
DRAFT Initial Title V Air Operation Permit No. 0570127-001-AV
Written Comments on DRAFT Permit

Dear Mr. Sheplak:

On behalf of the City of Tampa, Camp Dresser & McKee Inc. (CDM) is submitting written comments on the DRAFT Initial Title V Air Operation Permit for the McKay Bay Refuse-to-Energy Facility (Permit No. 0570127-001-AV), dated October 11, 1999. Our comments are listed by page number in the DRAFT permit, below:

1. **Statement of Basis, first page, second paragraph, second sentence:** This sentence states that the existing facility consists of four municipal waste combustors. We suggest adding here that the facility is in transition, with only two of the four units currently operating, and two replacement units under construction.
2. **Statement of Basis, first page, second paragraph, ninth line:** In the sentence, "Instead the nominal capacity is limited to 250 tons of waste per day at 5,000 Btu/lb as determined by a rolling 12-month average," please insert the underlined words. This is the heat content for the reference waste used in both the June 1996, Title V Air Operation Permit Application, and the September 1997, Source Modification Construction Air Permit Application. This reference waste heat content is part of the definition of "nominal" operating conditions at the Facility.

We believe that permit limitations on the tons of waste combusted, rather than heat input or steam flow, are inappropriate. This is evidenced by U.S. EPA's removal of the tonnage limit from the NSPS and the Emission Guidelines. However, the conditions in our permit for short-term capacity and heat input, and for an annual limitation for the nominal capacity, are acceptable as long as they are tied to the reference heating value for the waste.

Also, please modify the last sentence of this paragraph to reflect that two carbon and two lime storage silos will be provided.

Mr. Scott Sheplak
December 20, 1999
Page 2

This correction is also needed on Page 3 of 3 in the second paragraph. The Table of Contents will also require a conforming change.

3. **Statement of Basis, first page, last three lines:** This section, and others throughout the draft permit, states that the Facility is subject to the NESHAP for Beryllium (40 CFR 61, Subpart C, incorporated by reference in Rule 62-204.800(7), F.A.C.).

Based on the regulatory language in 40 CFR 61, Subpart C, it appears that the Beryllium NESHAP is not applicable to the Facility, because the Facility does not accept beryllium-containing waste generated by any of the source categories listed in the rule (extraction plant, ceramic plant, foundries, and propellant plants that process beryllium or beryllium compounds). Although incinerators are listed in the applicability criteria, it is only incinerators that accept beryllium-containing waste generated by the source categories listed above that are affected by the rule.

We request, therefore, that "NESHAP - 40 CFR 61, Subpart C, . . . Rule 62-204.800(7), F.A.C." be deleted from the list at the bottom of the page. (The Facility-specific beryllium emissions limit from its existing PSD permit would still apply.)

4. **Statement of Basis, 2nd page, third full paragraph, fourth line:** Same comment as No. 1, above.
5. **Statement of Basis, 2nd page, fourth full paragraph:** Please strike "A" at the beginning, and start the paragraph with "Bottom."
6. **Page 2, eighth line:** "Instead the nominal capacity is limited to 250 tons of waste per day at 5,000 Btu/lb as determined by a rolling 12-month average." Please insert the underlined words. (See Comment No. 1)
7. **Page 3:** E.U. ID No. 103, 104, 105 and 106 (MWC & Auxiliary Burners) are all identified as Unit 1. They should be identified as Units 103, 104, 105 and 106, respectively. Also, add a second Lime Storage Silo and a second Carbon Storage Silo. The facility will be equipped with two each of these.
8. **Page 4, Section II., Condition 2.:** We believe that the odor standard is not federally enforceable. If so, please add the words "not federally enforceable" to this condition.
9. **Page 4, Section II., Condition 4.b.:** Please add the words, "when, and if, such requirement becomes applicable," to the end of this condition. This clause is in 4.a., and is appropriate for this condition, as well.

Mr. Scott Sheplak
December 20, 1999
Page 3

10. **Page 5, Condition 7.:** Please delete the parenthetical clauses that say "insert any required systems" and "Month, day, year." Please add the following language: "As of the effective date of this permit, no control systems have been deemed necessary or ordered by the Department."
11. **Page 5, Condition 8.:** Please delete the word, "vacuum" from the second line.
12. **Page 5, Condition 9.:** Please list here the reporting requirements that would be tied to the effective date of the permit. We understand that submittal of the annual Statement of Compliance is one.
13. **Page 5, Condition 12.:** At the beginning of this condition, please add the following language: "After the retrofit is complete and compliance is demonstrated for Units 103, 104, 105 and 106, . . ." The total annual emissions limits in this condition apply after the facility retrofit.
14. **Pages 5 and 6, Conditions 12. and 13.:** We understand that these ton-per-year caps were set for the retrofitted Facility based on a calculation of potential minus actual emissions, and then limiting this difference so that the retrofit would not be a "significant" increase under the PSD rules. We would like to request, however that limits be set on Condition No. 13. This condition says, in essence, that any future increases in SO₂, NO_x or CO emissions anywhere at the Facility, at any time in the distant future, added together with the potential-minus-actual difference calculated for the retrofit, would count toward the "significant" increase threshold in the PSD rules.

U.S. EPA's PSD guidance in the October 1990, *Draft New Source Review Workshop Manual*, Pages A.36 and A.37 addresses this issue of "accumulation of emissions" over several projects at a Facility, and PSD applicability. In the fourth paragraph on p. A.36 of the guidance, it says, "A deliberate decision to split an otherwise 'significant' project into two or more smaller projects to avoid PSD review would be viewed as circumvention . . ." The guidance then goes on to say:

"Usually, at least two basic questions should be asked when evaluating the construction of multiple minor projects to determine if they should have been considered a single project. First, were the projects proposed over a relatively short period of time? Second, could the changes be considered as part of a single project?"

The example given for "relatively short period of time" is "a few months."

On this basis, we request that the following underlined language be added to the second sentence in No. 13: "Therefore, any net emissions increase that occurs within 12 months of completion of construction of any emission unit modified in PSD-FL-086(A), that

Mr. Scott Sheplak
December 20, 1999
Page 4

could also be considered part of that modification of that emissions unit, in SO₂ emissions of 1.0 ton per year, NO_x emission of 1.0 ton per year, or CO emissions of 2.0 tons per year will initiate preconstruction review requirements pursuant to . . .”

15. **Page 6, Condition 13.:** Please add the following language to the beginning of this condition: “The following condition applies after the retrofit is complete and compliance is demonstrated for Units 103, 104, 105 and 106.”
16. **Page 6, Condition 13.:** This condition refers to “Facility-wide Condition 14.” This condition is missing in the draft permit. If there is no Condition No. 14, please delete this reference.
17. **Page 7, Section III, Subsection A., first paragraph, first sentence:** For clarity in the description of the emission units in Subsection A., please add “existing as of 1998” to the end of the first sentence. This will distinguish them from the retrofitted units in Subsection C. We also suggest adding to this paragraph that Units 003 and 004 have been demolished and no longer exist.
18. **Page 7, Section III, Subsection A., second paragraph:** Please delete the reference to 40 CFR 61, Subpart C, NESHAP for Beryllium. (See Comment No. 2.)
19. **Page 7, Condition A.1.:** Please add the underlined words to the first sentence: “The charging rate to each unit shall not exceed 10.5 tons per hour of waste at 5,000 Btu/lb.” (See Comment No. 1.)
20. **Page 9, Condition A.3.7.(h):** Please add to the end, “Waste materials specifically authorized above do not require prior Department approval before combustion.”
21. **Page 10, Condition A. 5.:** Please add “existing as of 1998” after Units 1 through 4.
22. **Page 11, Condition A.8.:** The language concerning excess emissions should be the same as in Condition C.32. The three-hour period for excess emissions was established by the U.S. EPA as appropriate for municipal waste combustors.
23. **Page 12, Conditions A.12. and A.13.:** The existing operating permit AO29-206279 requires that this testing be done for SO₂ and NO_x from the existing units once every five years (six months prior to the permit expiration date, see Specific Condition No. 9), not annually.
24. **Page 13, Condition A.17.:** Please add Method 29 as an acceptable mercury test method. (See Pages 47-48, Condition C.37.)

Mr. Scott Sheplak
December 20, 1999
Page 5

We also believe that the mercury testing frequency for the existing units should be annual, rather than once every five years, based on Rule 62-296.416(3)(a)3., F.A.C. (see Condition C.19).

25. **Page 14, Condition A.23.(a)2.:** Please add to this condition that the 60-minute observation period applies to the existing MWC combustor emissions units, because they each have the potential to emit 100 tons per year or more of particulate matter.
26. **Page 14, Condition A.23.(a)2.:** Please delete (a)2.a. It is not applicable, because this facility does not have any batch or cyclical processes.
27. **Page 16, Condition A.25.(a)2.:** Please delete (a)2. It is not applicable, because the facility does not have a soot blowing capability.
28. **Page 16, Condition A.25.(a)4.:** We request that DEP delete (a)4. The construction schedule for the new MWC units requires that the remaining two existing units cease operation by December 2000. This condition requires that testing be conducted once every fiscal year, and the fiscal year ends on September 30th. This condition would require, therefore, that the two remaining units have compliance testing performed in the last three months before they are decommissioned. This would be an onerous requirement for units that are about to be shut down, and Tampa respectfully requests that it be removed.
29. **Page 16, Condition A.25.(a):** The numbering jumps from 5. to 9. Please insert “[Reserved]” sections for clarity.
30. **Page 16, Condition A.25.(c):** This condition allowing a waiver of compliance test requirements does not appear to be applicable to the existing MWC units.
31. **Page 16, Condition A.27.(b):** Please strike belt scales, weight hoppers and tank scales, as they are not applicable to the Tampa McKay Bay Facility.
32. **Page 17, Condition A.29.:** As contained in the September 1997, Source Modification Construction Air Permit Application, we request that compliance with the requirement to record the daily charging rate be based on using the Facility’s truck scale weight data for a calendar month and MWC operating data for the same calendar month to compute an average daily MSW charging rate to each MWC for that month.
33. **Page 18, Condition A.33.:** This condition requires submittal of excess emissions and monitoring systems reports to the “Administrator.” We request that this condition specify whether the Administrator is the DEP or the Hillsborough County EPC.

Mr. Scott Sheplak
December 20, 1999
Page 6

34. **Page 20, Condition A.37.(b):** We understand that other waste-to-energy facilities in Florida have been granted 60 days after testing to submit the test report, rather than 45 days. Due to the complexity of the dioxin testing and analysis, we request that this condition be revised so that the Tampa McKay Bay Facility may similarly be allowed up to 60 days to file the test report with DEP.
35. **Page 20, Condition A.37.(b):** Please delete "of each test" near the end of the sentence, because this could result in a separate due date for each test for each individual pollutant.
36. **Page 21, Condition A.38.:** This condition requires submittal of malfunction report to the "Administrator." We request that this condition specify whether the Administrator is the DEP or the Hillsborough County EPC.
37. **Page 22, Condition A.40.:** Process parameter (8) has a typo. "102%" should be "120%."
38. **Page 25, following Condition A.44.:** Please add a new Condition A.45 that says: "Section III.A. of this permit shall become null and void when the existing Emission Units 001, 002, 003 and 004 are all demolished."
39. **Page 27, Condition B.4.:** Please delete this condition, because determination of process variables does not apply to this emissions unit, a flyash silo. At minimum, please change the title of this section from "Monitoring of Operations" to "Monitoring of Operations during Testing."
40. **Page 28, Condition B.8.:** Please delete this condition, because a maximum permitted operation rate does not apply to this emissions unit, a flyash silo.
41. **Page 29, Condition B.12.(a)2.:** Please delete (a)2., which requires testing while soot blowing. This emissions unit (a flyash silo) will not be soot blowing.
42. **Page 29, Condition B.12.(a)4.:** We request that DEP delete (a)4. The construction schedule for the new ash handling system requires that the existing ash storage silo cease operation by December 2000. This condition requires that testing be conducted once every fiscal year, and the fiscal year ends on September 30th. This condition would require, therefore, that the existing ash storage silo have compliance testing performed in the last three months before it is decommissioned. This would be an onerous requirement, and Tampa respectfully requests that it be removed. At minimum, please delete (a)4.b., because the flyash silo does not have applicable standards for any of the listed pollutants.
43. **Page 31, following Condition B.13:** Please add a new Condition B.14 that says: "Section III.B. of this permit shall become null and void when the existing Emission Unit 005 is

Mr. Scott Sheplak
December 20, 1999
Page 7

- demolished.”
44. **Page 32, Subsection C, first paragraph:** In the first line, add “constructed after 1998” at the end of the first sentence. Also in the same paragraph add “At 5,000 Btu/lb” following “...250 tons of waste per day...” in the fourth line.
 45. **Page 32, Subsection C, second paragraph:** Please delete the reference to 40 CFR 61, Subpart C, NESHAP for Beryllium. (See Comment No. 2.)
 46. **Page 33, Condition C.1.:** In the first sentence, second line, please place a period after “measurement,” and delete the rest of the sentence pertaining to a net steam energy of 1103 Btu/lb steam. We request deleting this because it would be difficult to verify the net steam energy on a routine basis.
 47. **Page 33, Condition C.1.:** Please add the underlined words to the last sentence, “Additionally, each unit shall not be charged with more than 250 tons of waste at 5,000 Btu/lb per day, as determined by a 12-month rolling average.”
 48. **Page 33, Condition C.2.:** We believe that this is unnecessary. The City of Tampa is willing to stipulate that it is a large MWC, in accordance with 40 CFR 60.31b and 40 CFR 60.58b(j). Please delete this condition. At minimum, please delete Condition C.2.(2), because the Tampa McKay Bay Facility does not have any batch-fed MWC units.
 49. **Page 34, Condition C.4.:** Please add the parenthetical phrase, “(steam flow)” after “load” in the second line, and again in the third line.
 50. **Page 35, Condition C.6.4., last sentence:** Please add the words “or propane” following the first word in the sentence, “Natural.”
 51. **Page 36, Condition C.6.7. (h):** Please add to the end, “Waste materials specifically authorized above do not require prior Department approval before combustion.”
 52. **Page 36, Condition C.6.8.:** Please insert “or propane” following “natural” throughout this condition (there are eight places).
 53. **Page 37, Condition C.10.:** In (1), please place a period after “average,” and delete the remainder of the sentence, because it is not applicable to this facility. Please strike all of (2), because it is not applicable to this facility.
 54. **Page 42, Condition C.19.:** This condition, which requires that waste-to-energy facilities comply with the state mercury standard by July 1, 1995, and test annually thereafter, is more applicable to the existing units in Section III.A. than to the reconstructed units in

Mr. Scott Sheplak
December 20, 1999
Page 8

this section. We suggest deleting this condition here, and adding it after Condition A.17 on page 13.

55. **Page 42, Condition C.20.:** Please delete this condition. It is not applicable to the Tampa McKay Bay Facility, because it does not use waste separation.
56. **Page 45, Condition C.32, first paragraph, second sentence:** Please add the underlined words to the second sentence, consistent with the Emissions Guidelines (40 CFR 60.58b(a)(1)) and Section III., Condition B.7 of PSD-FL-086(A): "Duration of startup, shutdown, or malfunction periods are limited to 3 hours per occurrence."
57. **Page 46, Condition C.35:** Please reference Condition No. C.47 here as the conditions that DEP specifies for operation of the Facility during performance tests.
58. **Page 47, Condition C.36.(9) and (11):** We request that the parenthetical phrase at the end of (9) and (11) be changed to include the underlined words: "(no more than 12 calendar months, plus or minus 30 days, following the previous performance test)." This allowance for plus or minus 30 days for the annual testing is part of the facility's current operating permit (No. AO29-206729, Specific Condition No. 8.), and the City of Tampa requests that this be carried forward into the Title V operating permit, as well. With this allowance, the City can avoid having to schedule annual emissions testing every 11 months, in order to allow "no more than 12 calendar months" to elapse.
59. **Page 47, Condition C.37.(1)(vii):** The City of Tampa requests that the parenthetical phrase at the end of (vii) be changed to include the underlined words: "(no more than 12 calendar months, plus or minus 30 days, following the previous performance test)." (See Comment No. 58, above.)
60. **Page 47, Condition C.37.(3):** We believe that "(2)(I) through (2)(xi)" should be changed to "(3)(I) through (3)(xi)."
61. **Page 51, Condition C.40.(7):** Please add "plus or minus 30 days" after "12 calendar months" in the parenthetical clause at the end of (7). (See Comment No. 58, above.)
62. **Page 52, Condition C.41.(5)(I):** Please add "plus or minus 30 days" after "12 calendar months" in the parenthetical clause at the end of (5)(I). (See Comment No. 58, above.)
63. **Page 52, Condition C.41.(5)(iii):** This condition refers to 7 nanograms per dry standard cubic meter in four places.
Please change these to 15 nanograms per dry standard cubic meter, consistent with 40 CFR 60 Subpart Cb for existing facilities. The 7 nanograms is from 40 CFR 60 Subpart Eb for new facilities, which does not apply.

Mr. Scott Sheplak
December 20, 1999
Page 9

64. **Page 54, Conditions C.43. and C.44.:** We request that "plus or minus 30 days" be added after "every five years" in both of these conditions, consistent with this allowance granted for annual testing in the facility's current operating permit (No. AO29-206729, Specific Condition No. 8.).
65. **Page 55, Condition C.47.:** At the end of the first sentence, please replace the words "the permit" with the words "Condition C.1." In the second sentence, please replace the words "the minimum" with "ninety percent of."
66. **Page 56, Condition C.49.(a)2.:** Please delete (a)2.a. and (a)2.b., because they are not applicable to the facility. The facility does not have any batch or cyclical processes, and is not seeking a waiver of compliance test requirements.
67. **Page 57, Condition C.51.(a)4.c.:** Please delete this condition, because there is no applicable NESHAP emissions standard for this facility. (See Comment No. 3.)
68. **Page 58, Condition C.53.:** The City of Tampa requests that compliance with the opacity limit be demonstrated by the continuous opacity monitoring system (COMS), instead of by Method 9, in accordance with Condition C.54.
69. **Page 60, Condition C.60.:** This condition is not applicable to the Tampa McKay Bay Facility, because the facility does not have any combined-unit flue gas flows. The City requests that it be deleted.
70. **Page 61, Condition C.62.(b):** Please strike belt scales, weight hoppers and tank scales as they are not applicable to the McKay Bay Facility.
71. **Page 62., Condition C.66.:** This condition requires submittal of excess emissions and monitoring systems reports to the "Administrator." We request that this condition specify whether the Administrator is the DEP or the Hillsborough County EPC.
72. **Page 64, Condition C.70:** This condition is no longer necessary. Please delete it. The City of Tampa has already provided notice for the current reconstruction.
73. **Page 69, Condition C.80 (b):** We understand that other waste-to-energy facilities in Florida have been granted 60 days after testing to submit the test report, rather than 45 days. Due to the complexity of the dioxin testing and analysis, it is very difficult to obtain the test results within 45 days.

We request that this condition be revised so that the Tampa McKay Bay Facility may similarly be allowed up to 60 days to file the test report with DEP.

Mr. Scott Sheplak
December 20, 1999
Page 10

74. **Page 73, Section III., Subsection D., first paragraph, second sentence:** Please add the underlined words to the second sentence: “Fugitive ash emissions will be controlled by enclosing the ash transfer and storage system, and by providing two wet scrubbers, one at the exhaust of the scalper building, and one at the exhaust of the ash handling building.” Does this change necessitate adding new emissions units to the permit, one for each scrubber, or can these still be treated as part of the “Ash Building and Handling System” Emissions Unit?
75. **Page 75, Condition D.7.(4):** Please add “plus or minus 30 days” after “12 calendar months” in the parenthetical clause at the end of (4). (See Comment No. 58, above.)
76. **Page 28, Condition D.9.:** Please delete this condition, because a maximum permitted operation rate does not apply to this emissions unit, an ash handling facility.
77. **Page 76, Condition D.10.(a)2.:** The first line refers to EPA Method 9. We believe this should be changed to EPA Method 22, which is more appropriate for fugitive sources. This would also be consistent with Condition D.7.
78. **Page 76, Condition D.10.(a)2.a. and b.:** Please delete (a)2.a., because there are no batch or cyclical processes in the ash handling facility.
Please delete (a)2.b., because the only limit that applies to this emissions unit is an opacity limit.
79. **Page 77, Condition D.11(a):** This general compliance testing requirement is in the section on fugitive ash emissions. Very little of this condition applies to fugitive ash, or it is superseded by the more specific Condition D.7. We suggest deleting this condition. At minimum, please delete Paragraphs 2. (soot blowing) and 4.b. and c. as not applicable, and insert “[Reserved]” for Paragraphs 1., 2., 5., 6., 7. and 8. This same comment applies to Page 86, Condition E.11.(a)2. for the lime storage silos, and Page 91, Condition F.11.(a)2. for the activated carbon silo.
80. **Pages 78 and 79, Conditions D.13., D.15., and D.16.:** None of these requirements are applicable to the ash handling system. We request that they be deleted from this section.
81. **Page 80, Condition D.18.(c):** Please delete everything in (c) after the first sentence. These are not applicable to a Method 22 test at an ash handling facility.
82. **Page 83, Condition E.2.:** The lime storage silo particulate matter emissions limit of 0.015 grains per dry standard cubic foot up to 0.36 pounds per hour is incorrect. The correct hourly emission rate should be 0.154 pounds per hour.

Mr. Scott Sheplak
December 20, 1999
Page 11

Each of the two lime storage silos will have a maximum potential emission rate of 0.67 tons per year of particulate matter, based on the specified performance of the baghouse of 0.015 grains per dry standard cubic foot. Since this is less than one ton per year, we request, pursuant to Rule 62-296.700(2)(c), that DEP exempt the lime storage silos from the PM RACT requirements.

83. **Page 84, Condition E.8.:** DEP has already granted the waiver referenced in this condition. Please replace this condition with Specific Condition C.3. of the Air Construction Permit 0570127-002-AC, PSD-FL-086(A), which states:

“The PM compliance test requirements are waived for the lime and carbon storage silos and an alternate standard of 5 percent opacity shall apply. Compliance testing for the lime and carbon storage silos shall be conducted within 180 days of completion of construction and initial operation, and annually plus or minus 30 days thereafter. The visible emission tests shall be performed for each silo during filling operations using EPA Method 9. A visible emission reading greater than 5 percent opacity does not create presumption that the emission limit (in gr/dscf) is being violated, but may require the owner or operator to perform a particulate stack test. Permanent stack testing facilities are not required for the lime and carbon storage silos. The owner or operator may install temporary stack sampling facilities to conduct such a test, if required. [Rule 62-297.620(4), F.A.C.]”

The City of Tampa requests that the underlined phrase “plus or minus 30 days” be added to this condition, as shown above.

84. **Pages 85, 86 and 87, Conditions E.9.; E.10.(a)2.a. and b.; E.11.(a)2. and 4.b. and c.; and E.12.:** These requirements are not applicable to the lime storage silos. We request that they be deleted from this section, and replaced by the new Condition E.8., described above. For Condition E.11., insert “[Reserved]” for Paragraphs 1., 2., 5., 6., 7. and 8.
85. **Page 87, Condition E.11. (c):** Same as Comment No. 83.
86. **Pages 87-88, Condition E.14.(c):** Please delete everything in © after the first sentence. These are not applicable to a Method 9 test at the lime storage silos.
87. **Page 89, Section III., Subsection F., Brief Description and first paragraph:** Please change these to reflect that there will be two activated carbon storage silos.
88. **Page 89, Condition F.2:** The activated carbon storage silo particulate matter emissions limit of 0.015 grains per dry standard cubic foot up to 0.36 pounds per hour is incorrect. The correct hourly emission rate should be 0.154 pounds per hour.

Mr. Scott Sheplak
December 20, 1999
Page 12

Each carbon storage silo will have a maximum potential emission rate of 0.67 tons per year of particulate matter, based on the specified performance of the baghouse of 0.015 grains per dry standard cubic foot. Since this is less than one ton per year, we request, pursuant to Rule 62-296.700(2)(c), that DEP exempt the carbon storage silos from the PM RACT requirements.

89. **Page 90, Condition F.8:** DEP has already granted the waiver referenced in this condition. Please replace this condition with Specific Condition C.3. of the Air Construction Permit 0570127-002-AC, PSD-FL-086(A), which states:

“The PM compliance test requirements are waived for the lime and carbon storage silos and an alternate standard of 5 percent opacity shall apply. Compliance testing for the lime and carbon storage silos shall be conducted within 180 days of completion of construction and initial operation, and annually plus or minus 30 days thereafter. The visible emission tests shall be performed for each silo during filling operations using EPA Method 9. A visible emission reading greater than 5 percent opacity does not create presumption that the emission limit (in gr/dscf) is being violated, but may require the owner or operator to perform a particulate stack test. Permanent stack testing facilities are not required for the lime and carbon storage silos. The owner or operator may install temporary stack sampling facilities to conduct such a test, if required. [Rule 62-297.620(4), F.A.C.]”

The City of Tampa requests that the underlined phrase “plus or minus 30 days” be added to this condition, as shown above.

90. **Pages 91, 92 and 93, Conditions F.9.; F.10.(a)2.a. and b.; F.11.(a)2. and 4.b. and c.; and F.12.:** These requirements are not applicable to the carbon storage silos. We request that they be deleted from this section, and replaced by the new Condition F.8., described above. For Condition F.11., insert “[Reserved]” for Paragraphs 1., 2., 5., 6., 7. and 8.
91. **Page 92, Condition No. F.11.(c):** Same as Comment No. 89.
92. **Appendix I-1, List of Insignificant Emissions Units:** Please add, “12. Urea or ammonia storage tank” to the list of insignificant emissions units. Also, we are requesting that a permitting note or parenthetical be added to indicate annual average for paint use identified in “2. Paint usage less than 6.0 gallons per day.”
93. **Table 1-1 Summary of Air Pollutant Standards and Terms, Page 5 of 6:** The hourly particulate matter emission limit for each lime storage silo (there should be two listed) should be changed from 0.36 lbs/hour to 0.154 lbs/hour. An hourly emission rate of 0.154 lbs/hour is equal to 0.68 tons per year based on 8,760 hours/year of operation. Therefore, the equivalent emissions of 1.6 tons per year presented in this table should be changed to 0.68 tons per year. (See Comment No. 82.)

Mr. Scott Sheplak
December 20, 1999
Page 13

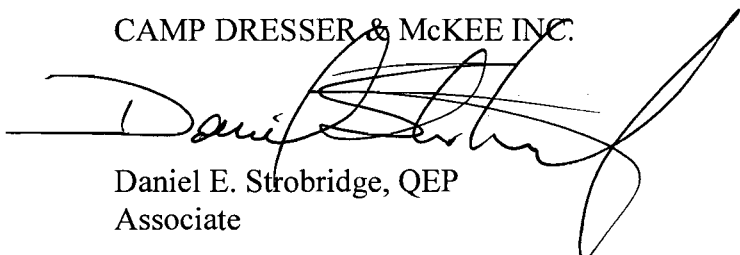
94. **Table 1-1 Summary of Air Pollutant Standards and Terms, Page 6 of 6:** The hourly particulate matter emission limit for the activated carbon storage silo (there should be two of them) should be changed to 0.154 lbs/hour. In addition, the equivalent emissions of 1.6 tons per year should be changed to 0.68 tons per year. (See Comment No. 88.)
95. **Table 2-1 Summary of Compliance Requirements, Page 1 of 6:** Based on the existing operating permit (No. AO29-206279), and the waste-to-energy mercury rule (Rule 62-296.416(3)(a)3., F.A.C.), the testing frequencies in this table should be corrected to show "Annual" for mercury, and "Renewal" for Sulfur Dioxide and Nitrogen Oxides.
96. **Table 2-1 Summary of Compliance Requirements, Page 5 of 6:** Please indicate that there are two lime storage silos. Also, please change the Particulate Matter testing frequency from "Renewal" to "If Requested by Department." As discussed in Comment No. 83, DEP has granted a waiver for the Method 5 testing.
97. **Table 2-1 Summary of Compliance Requirements, Page 6 of 6:** Please indicate that there are two activated carbon storage silos. Also, please change the Particulate Matter testing frequency from "Renewal" to "If Requested by Department." As discussed in Comment No. 89, DEP has granted a waiver for the Method 5 testing.

We greatly appreciate your consideration of these comments on the DRAFT Initial Title V Air Operation Permit for the McKay Bay Refuse-to-Energy Facility.

Please feel free to call me at (813) 281-2900 if you need any clarification, or would like to discuss these comments.

Very truly yours,

CAMP DRESSER & MCKEE INC.


Daniel E. Strobridge, QEP
Associate

- c: N. McCann, City of Tampa
J. Campbell, Hillsborough County EPC
D. Elias, RTP
D. Dee, Landers & Parsons

12/21/99 cc: Scott Sheplak
Ed Svec



Jeb Bush
Governor

Barbara / File

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

November 19, 1999

The Honorable Dick Greco
Mayor, City of Tampa
306 East Jackson Street
Tampa, Florida 33602

Re: DRAFT Title V Permit No.: 0570127-001-AV
McKay Bay Refuse to Energy Facility

Dear Mayor Greco:

On November 17, 1999, the department received a request from Landers & Parsons, P.A. on behalf of the City of Tampa for an extension of time to file comments on the subject permit due to its length and complexity.

The public notice was published on October 22, 1999. The public comment period ends November 22. The department has reviewed the request and hereby extends the public comment period an additional 30 days to December 21, 1999.

If you should have any further questions, please contact me at 850/921-9532.

Sincerely,

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/sk

cc: Darwish El-Hajji, P.E., Camp Dresser & McKee, Inc.
Mark Kirchman, P.E., Wheelabrator McKay Bay, Inc.
Jerry Campbell, HCEPC
John T. LaVia, Landers & Parsons, P.A.
Dan Strobridge
Nancy McCann, City of Tampa
Greg Grotecloss, City of Tampa

LANDERS & PARSONS, P.A.

ATTORNEYS AT LAW

DAVID S. DEE
JOSEPH W. LANDERS, JR.
JOHN T. LAVIA, III
FRED A. McCORMACK
PHILIP S. PARSONS
ROBERT SCHEFFEL WRIGHT

HOWELL L. FERGUSON
OF COUNSEL

VICTORIA J. TSCHINKEL
SENIOR CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

MAILING ADDRESS:
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TALLAHASSEE, FL 32302-0271

310 WEST COLLEGE AVENUE
TALLAHASSEE, FL 32301

TELEPHONE (850) 681-0311
TELECOPY (850) 224-5595
www.landersondparsons.com

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NOV 17 1999

BUREAU OF AIR REGULATION

November 16, 1999

BY FACSIMILE TRANSMISSION (922-6979)

Mr. Scott Sheplak
Florida Department of
Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399-2400

Re: Request for Extension of Time to File
Comments Concerning Draft Title V
Permit for City of Tampa's McKay Bay
Refuse-to-Energy Facility
DEP Draft Permit No. 0570127-001-AV)

Dear Scott:

This letter is a follow-up to our telephone conversation of earlier today regarding an extension of time for the City of Tampa ("City") to file comments concerning the Department of Environmental Protection's ("Department") Draft Title V air operations permit for the City's McKay Bay Refuse-to-Energy Facility (DEP Permit No. 0570127-001-AV) (the "Draft Permit").


The City published notice of the Department's "Intent to Issue Title V Air Operation Permit" on October 22, 1999; therefore, the City's comments would be due on November 22, 1999. However, due to the length and complexity of the Draft Permit, the City requires additional time to carefully review the Draft Permit with its staff, its consultants, and the company that operates the Facility.

The City requests an extension of time of 45 days until January 6, 2000 to file comments concerning the Draft Permit. The City understands that this extension of the comment period will

Mr. Scott Sheplak
November 16, 1999
Page 2

also apply to comments from the public. Accordingly, once the City receives written notification from the Department that the comment period has been extended, the City will publish notice of the extension of time to file comments. Please provide me a copy of the Department's written notification with regard to this request by facsimile at 224-5595.

Thank you for your assistance in this matter. If you have any questions, please give us a call.

Sincerely,

John T. LaVia, III

JTL:pgv
cc: Dan Strobbridge
Nancy McCann
Greg Grotecloss

COMMISSION

PAT FRANK
CHRIS HART
JIM NORMAN
JAN PLATT
THOMAS SCOTT
RONDA STORMS
BEN WACKSMAN

EXECUTIVE DIRECTOR

ROGER P. STEWART



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WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

WETLANDS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

MEMORANDUM

DATE: November 19, 1999

TO: Scott Sheplak, P.E.

FROM: Steven S. Pak, P.E. *SP* THRU: *AK* Richard C. Kirby, IV, P.E.

SUBJECT: Comments on Draft Title V Permit for McKay Bay Refuse To Energy Facility

The Environmental Protection Commission of Hillsborough County (EPC) has reviewed the draft Title V Air Operation Permit for the City of Tampa's McKay Bay Refuse to Energy Facility (0570127-001-AV) and has the following comments.

Facility-wide Conditions

1. The reasonable precautions to prevent unconfined emissions of particulate matter that are included in the initial Title V application should be added to the Title V permit.

Subsection A

2. Specific condition A.17. requires that the existing MWC units demonstrate compliance with the mercury emissions limit using EPA Method 101A prior to permit renewal and every five years thereafter. Method 101A is for sewage sludge incinerators and does not seem appropriate for a facility that is prohibited from burning sewage sludge. Instead, compliance should be demonstrated with EPA Method 29 which is the method required by Rule 62-296.416, F.A.C., and 40 CFR 60, Subpart Cb. In addition, mercury testing is required annually by Rule 62-296.416, F.A.C.
3. The Operation and Maintenance Plan included at specific condition A.40. specifies the range for excess air in the MWC units as 50 to 102% which is not consistent with the range of 50 to 120% included in Operating Permit AO29-206279. The correct range should be verified.

Subsection B

4. An Operation and Maintenance (O&M) plan as required by Rule 62-296.700(6), F.A.C., needs to be included.



5. The EPC believes that additional periodic monitoring must be added to satisfy the requirements of Rule 62-213.440(1)(b)1.b. For this emissions unit, we recommend that requirements be added to 1) check and record the pressure drop on the baghouse on a daily basis, 2) perform and record the results of an instantaneous visual emissions determination on the baghouse on a daily basis, and 3) take immediate corrective action and submit a deviation report if visual emissions are observed or the baghouse is found to be operating outside of the pressure range specified in the O&M plan. For an example of how the EPC has incorporated such requirements into an O&M plan, see the draft Title V permit for Lafarge Florida, Inc. (0570018-002-AV).

Subsection C

6. Our most significant comment is the manner in which the draft permit handles the upgrades to the facility to comply with 40 CFR 60, Subpart Cb, as authorized by Permit No. 0570127-002-AC (PSD No.: PSD-FL-086(A)). The draft Title V permit includes Subsection A which applies to the four existing municipal waste combustor (MWC) units and Subsection C which would apply to the same units after construction is completed and compliance is demonstrated. While we agree with the need for the Subpart Cb compliance schedule in the draft permit, we feel that the actual Subpart Cb requirements should not be incorporated into the permit until after construction is completed, compliance is demonstrated, and an application to revise the Title V permit is submitted. This would be consistent with Rule 62-210.300(2), F.A.C., and the manner in which we process non-Title V operating permits. In addition, waiting to incorporate the Subpart Cb requirements into the Title V permit would allow us to include only the compliance requirements that apply to the facility rather than all the requirements that may apply in the future.

Subsections D, E, and F

7. The draft permit includes Subsection D for ash handling and storage, Subsection E for two lime storage silos, and Subsection F for an activated carbon storage silo. All of these emissions units are a part of the facility upgrades to come into compliance with CFR 60, Subpart Cb. We believe that these unconstructed emissions units should not be included in the Title V permit at this time for the same reasons presented in comment 6 above.

While we have done a detailed review of Subsection C, D, E, and F, we are not providing any specific comments on these subsections because of our position that they should not be included in the permit at this time. If you would like to have our detailed comments on these subsections, or if I can be of any other assistance, please contact me.

INTEROFFICE MEMORANDUM

copy to Ed 12/8/99. Ed Svec

Date: 19-Nov-1999 04:06pm
From: Steven Pak
pak@epcjanus.epchc.org
Dept:
Tel No:

To: Scott Sheplak (sheplak_s@dep.state.fl.us)
CC: Rick Kirby (kirby@epchc.org)

Subject: City Of Tampa McKay Bay Draft Title V Permit

MEMORANDUM

DATE: November 19, 1999

TO: Scott Sheplak, P.E.

FROM: Steven S. Pak, P.E. THRU: Richard C. Kirby, IV, P.E.

Subject: Comments on Draft Title V Permit for McKay Bay Refuse To Energy Facility

The Environmental Protection Commission of Hillsborough County (EPC) has reviewed the draft Title V Air Operation Permit for the City of Tampa's McKay Bay Refuse to Energy Facility (0570127-001-AV) and has the following comments.

Facility-wide Conditions

1. The reasonable precautions to prevent unconfined emissions of particulate matter that are included in the initial Title V application should be added to the Title V permit.

Subsection A

2. Specific condition A.17. requires that the existing MWC units demonstrate compliance with the mercury emissions limit using EPA Method 101A prior to permit renewal and every five years thereafter. Method 101A is for sewage sludge incinerators and does not seem appropriate for a facility that is prohibited from burning sewage sludge. Instead, compliance should be demonstrated with EPA Method 29 which is the method required by Rule 62-296.416, F.A.C., and 40 CFR 60, Subpart Cb. In addition, mercury testing is required annually by Rule 62-296.416, F.A.C.
3. The Operation and Maintenance Plan included at specific condition A.40. specifies the range for excess air in the MWC units as 50 to 102% which is not consistent with the range of 50 to 120% included in Operating Permit AO29-206279. The correct range

should be verified.

Subsection B

4. An Operation and Maintenance (O&M) plan as required by Rule 62-296.700(6), F.A.C., needs to be included.
5. The EPC believes that additional periodic monitoring must be added to satisfy the requirements of Rule 62-213.440(1)(b)1.b., F.A.C. For this emissions unit, we recommend that requirements be added to 1) check and record the pressure drop on the baghouse on a daily basis, 2) perform and record the results of an instantaneous visual emissions determination on the baghouse on a daily basis, and 3) take immediate corrective action and submit a deviation report if visual emissions are observed or the baghouse is found to be operating outside of the pressure range specified in the O&M plan. For an example of how the EPC has incorporated such requirements into an O&M plan, see the draft Title V permit for Lafarge Florida, Inc. (0570018-002-AV).

Subsection C

6. Our most significant comment is the manner in which the draft permit handles the upgrades to the facility to comply with 40 CFR 60, Subpart Cb, as authorized by Permit No. 0570127-002-AC (PSD No.: PSD-FL-086(A)). The draft Title V permit includes Subsection A which applies to the four existing municipal waste combustor (MWC) units and Subsection C which would apply to the same units after construction is completed and compliance is demonstrated. While we agree with the need for the Subpart Cb compliance schedule in the draft permit, we feel that the actual Subpart Cb requirements should not be incorporated into the permit until after construction is completed, compliance is demonstrated, and an application to revise the Title V permit is submitted. This would be consistent with Rule 62-210.300(2), F.A.C., and the manner in which we process non-Title V operating permits. In addition, waiting to incorporate the Subpart Cb requirements into the Title V permit would allow us to include only the compliance requirements that apply to the facility rather than all the requirements that may apply in the future.

Subsections D, E, and F

7. The draft permit includes Subsection D for ash handling and storage, Subsection E for two lime storage silos, and Subsection F for an activated carbon storage silo. All of these emissions units are a part of the facility upgrades to come into compliance with CFR 60, Subpart Cb. We believe that these unconstructed emissions units should not be included in the Title V permit at this time for the same reasons presented in comment 6 above.

While we have done a detailed review of Subsection C, D, E, and F, we are not providing

any specific comments on these subsections because of our position that they should not be included in the permit at this time. If you would like to have our detailed comments on these subsections, or if I can be of any other assistance, please contact me.

FILE - Scott, al
8/8
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OCT 22 2001

BUREAU OF AIR REGULATION

CITY OF TAMPA MEMORANDUM

DATE: October 16, 2001

TO: BRIAN BEALS, EPA
CLAIR FANCY, DEP
MARY JEAN YON, DEP
BOB BUTERA, DEP
JERRY CAMPBELL, EPC
PAUL SCHIPFER, EPC
DAVID DEE, Landers and Parsons

FROM: GREIG GROTECLOSS, City of Tampa 

SUBJECT: McKay Bay Refuse-to-Energy Facility

The quarterly progress report for the Clean Air Act retrofit of the McKay Bay Refuse-to-Energy Facility is attached. This is submitted in accordance with the dioxin agreement, the ash building variance and the yard waste variance. The Facility has been operating in compliance with the EPA emission guidelines and the FDEP ash rules since the fourth quarter of 2000. All yardwaste is being recycled or used as fuel at the Facility as of this quarter. The Facility is currently operating in full compliance with all applicable regulations.

Please call me at (813) 242-5408 if you have any questions or would like additional information.

McKay Bay Refuse-to-Energy Facility Clean Air Act Retrofit Status Report

Actions Taken Last Quarter (3Q01)

- Completed the construction and start up of units 1 and 2. All units are now retrofitted.
- Began construction of the maintenance building.
- Began construction of the new employee parking lot.
- Ceased all waste diversions to the Southeast County Landfill.
- Ceased landfilling commingled yard waste.
- Continued operating units 3 and 4.

Actions Planned For Next Quarter (3Q98)

- Complete acceptance testing of the Facility.
- Conduct second annual compliance tests on units 3 and 4. Conduct initial compliance tests on units 1 and 2.
- Complete all remaining site work (parking lot, maintenance building, final paving, landscaping etc).

COMMISSION

PAT FRANK
CHRIS HART
JIM NORMAN
JAN PLATT
THOMAS SCOTT
RONDA STORMS
BEN WACKSMAN



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TELEPHONE (813) 272-7104

EXECUTIVE DIRECTOR

RICHARD D. GARRITY, Ph.D.

MEMORANDUM

RECEIVED

OCT 18 2000

BUREAU OF AIR REGULATION

DATE: October 16, 2000

TO: Scott Sheplak, P.E.

FROM: Steven S. Pak, P.E. *SP*

THRU: Sterlin K. Woodard, P.E. *[Signature]*

SUBJECT: Proposed Title V Permit for McKay Bay Refuse to Energy Facility

On October 2, 2000, we received a fax from you requesting assistance with a requirement at the facility referenced above that ash hauling trucks be subject to a wheel wash prior to leaving the site. The facility requested that such a requirement not be included in their Title V permit. Wheel washing was listed as a reasonable precaution in their 1996 Title V permit application and also in the 1997 construction permit application for modifications to comply with 40 CFR 60, Subpart Cb.

After visiting the facility on October 6, 2000, I confirmed that the facility has wheel wash equipment in use at the original ash handling area currently being used for Units 1 and 2. In this area, the ash is discharged outside onto piles and is eventually loaded into trucks by front-end loaders. The trucks pass through a wheel wash prior to exiting the ash handling area. Because the ground in this area is blanketed with ash that could easily be picked up by truck tires, the requirement for wheel washing should continue to apply to this ash handling area.

Units 1 and 2 are scheduled to be shut-down by November 13, 2000. After the units are rebuilt, all of the ash from all four units will go to the new ash handling area currently serving rebuilt Units 3 and 4. This area was much cleaner than the old ash handling area and the facility believes that they could maintain it that way because of the layout of the area (i.e., the front-end loaders never enter the path of the ash trucks) and because it is in a paved, enclosed building. The building has a water hose near the truck loading area that the facility said would be used to wash away ash that spills during truck loading. The wastewater travels down the sloped floor inside the building to a wastewater sump. Based on my observations on October 6th, I believe that these precautions would be adequate and that a wheel wash is not necessary for the new ash handling building.

As stated above, I believe that the truck wash should continue to be used at the old ash handling area as long as it is in operation. For the new ash handling area/building, I believe that a wheel wash is not necessary provided that the facility is required after each truck loading to wash away any ash on the floor of the building in the path of the ash truck traffic.

*10/19/00 cc: Scott Sheplak
Ed Svec*

-9-

BEST AVAILABLE COPY

EA

SAH
10/11

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CITY OF TAMPA,)	
)	
Petitioner,)	
)	
y.)	DEP Draft Permit No. 0570127-001-AV
)	OGC File No. 99-1787
DEPARTMENT OF ENVIRONMENTAL)	
PROTECTION,)	
)	
Respondent.)	

CITY OF TAMPA'S
PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner, the City of Tampa, respectfully submits this petition for a formal administrative hearing, pursuant to the Florida Department of Environmental Protection's Order Denying Request for Extension of Time to File Petition for Hearing, and in accordance with Sections 120.569 and 120.57(1), Florida Statutes, and Rule 28-106.201, Florida Administrative Code. In support of this petition, the City says:

The Parties

1. Petitioner, the City of Tampa (the "City"), is a political subdivision of the State of Florida. The City's offices are located at City Hall, 315 East Kennedy Boulevard, Tampa, Florida 33602. The City Attorney's telephone number is 813-274-8996. For the purposes of this proceeding, all legal papers and correspondence should be served upon the City's environmental

counsel, Mr. David S. Dee, and copies provided to Mr. James Palermo, the City Attorney. The addresses and telephone numbers for Mr. Dee and Mr. Palermo are provided below.

2. Respondent, the Florida Department of Environmental Protection (the "Department" or "DEP") is an agency of the State of Florida. The Department's address is 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-2400. The telephone number for the Department's Office of General Counsel is (850) 488-9314.

Notice of Agency Action

3. The City owns the McKay Bay Refuse-to-Energy Facility (the "Facility"), which is located at 107 North 34th Street, Tampa, Florida. On June 17, 1996, the City filed an application with the Department for a Title V air operation permit for the Facility. On October 11, 1999, the Department provided the City with a copy of DEP's "Intent to Issue Title V Air Operation Permit" and the draft Title V Air Operation Permit for the City's Facility (DEP Permit No. 0570127-CC1-AV) (the "Draft Permit"). The Draft Permit contained a number of provisions that were inconsistent with the City's application or otherwise inappropriate. Accordingly, the City timely requested and the Department granted a series of extensions of time to file a petition for a formal administrative hearing in this case.

4. On September 12, 2000, the Department issued an order denying the City's most recent request for an extension of time to

file a petition for a formal administrative hearing concerning the Draft Permit. The Department's order provides that the City shall have 10 days (i.e., until September 22, 2000) to file a petition for an administrative hearing in this case. Accordingly, this petition is timely filed.

The City's Negotiations with the Department

5. On behalf of the City, the City's consultants (Camp Dresser & McKee Inc. or "CDM") submitted comments to the Department concerning the Draft Permit on December 20, 1999. The Department did not respond to the City's comments for 8 months-- until August 17, 2000--at which time the Department provided the City's consultants with an electronic copy of a revised Draft Permit (the "Revised Permit"). The Revised Permit was intended to supercede and replace the Draft Permit. In the Revised Permit, the Department changed the conditions in the Draft Permit to address some, but not all, of the City's comments. However, the Revised Permit also included new requirements, which had not been in the Draft Permit, including a requirement to install a "wheel wash" system at the Facility.

6. On August 29, 2000, the City's consultants had lengthy discussions with the Department's staff concerning the Revised Permit. During those discussions, the Department's staff verbally agreed to change the Revised Permit to satisfy many of the City's remaining concerns. Among other things, the Department's staff

agreed to delete the requirement for a wheel wash system.

7. During the afternoon of September 8, 2000, the Department's staff called the City's consultants and asked whether the City was satisfied with the Revised Permit and would waive its right to file a petition for a formal administrative hearing concerning the Revised Permit. The City's consultants told the Department's staff that the City still had objections to the Revised Permit and, further, the consultants did not have the authority to waive the City's rights. In response, the Department's staff stated that the Department would deny the City's pending request for additional time to file a petition and would issue a "Proposed Permit", notwithstanding the City's objections.

8. On September 11, 2000, the Department issued a Proposed Permit for the Facility, which was provided electronically to the U.S. Environmental Protection Agency ("EPA"). The Proposed Permit superceded the Revised Permit. The Proposed Permit includes some, but not all, of the changes that the Department's staff verbally agreed to make during their August 29, 2000 discussions with the City's consultants. Significantly, the Proposed Permit requires the City to install a wheel wash system at the Facility, even though the City had objected to this requirement in the Revised Permit.

9. On September 11, 2000, the City's consultants timely submitted additional written comments to DEP concerning the Revised Permit. (A copy of the September 11, 2000 letter from CDM to the

Department is attached hereto as Exhibit A). The Department has not responded in writing to the City's comments in Exhibit A.

The City of Tampa's Substantial Interests

10. The City is the applicant for the Title V air operation permit that is the subject of this petition. As the applicant for the permit, the City's substantial interests are materially affected by the Department's proposed action.

Disputed Issues of Material Fact

11. In Exhibit A (the September 11, 2000 letter to the Department), the City's consultants identified the City's objections to the conditions imposed by the Department in the Proposed Permit. The issues raised in Exhibit A are incorporated herein by reference as disputed issues of material fact.

12. Based on its preliminary review of the Proposed Permit, the City also raises the following disputed issues of material fact in this case:

a. Whether the Proposed Permit conditions identified in Exhibit A are unnecessary or inappropriate.

b. Whether the Department is acting arbitrarily or unlawfully in attempting to impose the Proposed Permit conditions identified in Exhibit A.

c. Whether the Department had the authority to issue the Proposed Permit to EPA before the City was given the

opportunity to exhaust its state administrative remedies under Chapter 120, Florida Statutes..

13. The City reserves its right to raise additional disputed issues of material fact that may be identified through discovery in this case.

Ultimate Facts Which Entitle the City of Tampa to Relief

14. The City is entitled to relief in this case because the City has provided reasonable assurance that the Facility will comply with all applicable Department rules and requirements, without the imposition of the Proposed Permit conditions identified in Exhibit A. In addition, the Department's attempt to impose the conditions identified in Exhibit A is arbitrary and unlawful. Lastly, the Department exceeded its authority when it issued the Proposed Permit to EPA, over the City's objections, before the City was given an opportunity to file this petition for a formal administrative hearing.

Rules and Statutes Entitling the City to Relief

15. Based on the facts in this case, the City is entitled to relief pursuant to Chapters 120 and 403, Florida Statutes, and Chapters 28-106, 62-4, 62-210, 62-213, and 62-214, Florida Administrative Code.

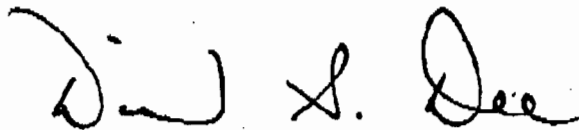
Relief Requested

WHEREFORE, the City of Tampa respectfully requests:

- a. the Department to revise the Proposed Permit to be consistent with the comments provided by the City in Exhibit A; or alternatively,
- b. the Department to forward this petition to the Division of Administrative Hearings for the assignment of an Administrative Law Judge;
- c. the Administrative Law Judge to conduct a formal administrative hearing pursuant to Sections 120.569 and 120.57(1), Florida Statutes;
- d. the Administrative Law Judge to issue a recommended order finding that the Proposed Permit conditions identified in Exhibit A are arbitrary and unlawful, and finding that the City has provided reasonable assurance that the Facility will comply with all applicable Department rules and regulations without the conditions identified in Exhibit A; and
- e. the Department to issue a final order granting the City's application for a Title V permit for the McKay Bay Refuse-to-Energy Facility, without the Proposed Permit conditions identified in Exhibit A.

RESPECTFULLY SUBMITTED,

LANDERS & PARSONS



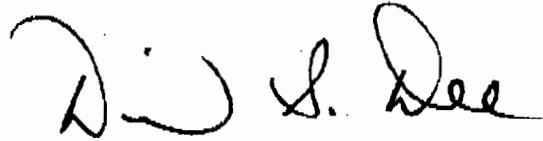
DAVID S. DEE
Florida Bar No. 281999
JOHN T. LAVIA, III
Florida Bar No. 953666
310 West College Avenue
Post Office Box 271
Tallahassee, Florida 32302
Phone: 850/681-0311
FAX: 850/224-5595

and

JAMES PALERMO
Florida Bar No. 060827
City Attorney
City Hall - 5th Floor
315 East Kennedy Boulevard
Tampa, Florida 33602
Phone: 813/274-8996
FAX: 813/274-8809

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the City of Tampa's Petition for Formal Administrative Hearing has been furnished via facsimile transmission to the Clerk's Office, Department of Environmental Protection, 3900 Commonwealth Boulevard, Room 659, Tallahassee, Florida on September 21, 2000; that the original and one copy will be furnished by hand delivery to the Clerk's Office, Department of Environmental Protection, 3900 Commonwealth Boulevard, Room 659, Tallahassee, Florida on September 22, 2000; and that a true and correct copy of the foregoing has been furnished by U.S. Mail to W. Douglas Beason, Assistant General Counsel, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399 this 21st day of September, 2000.



Attorney

BEST AVAILABLE COPY



Camp Dresser & McKee Inc.

EXHIBIT A

Engineering
Architecture
Construction
OperationsWestshore Center
1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
Tel: 813 281-2900 Fax: 813 288-8787

September 11, 2000

Mr. Scott Sheplak, P.E.
Title V Administrator
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Subject: McKay Bay Title V Permit No. 0570127-001-AV

Dear Mr. Sheplak:

On behalf of the City of Tampa, Camp Dresser & McKee Inc. (CDM) is providing the following additional input on the Revised DRAFT Initial Title V Air Operation Permit for the McKay Bay Resource Recovery Facility (Permit No. 0570127-001-AV), received via electronic submission on August 17, 2000. We appreciate your taking the time to discuss our concerns with us on August 29, 2000. At that time, you agreed to make most of the changes requested. We are disappointed, and think it inappropriate that the Department released the Permit as proposed without our sign off and without incorporating changes previously agreed to. Our comments below, are listed by DRAFT permit condition number:

1. Section I, Subsection II, Condition 8: This Condition has been changed at the request of the Hillsborough County Environmental Protection Commission ("HCEPC") to include the requirement that ash hauling trucks be subjected to a wheel wash prior to leaving the site. Please be advised that the new ash handling configuration incorporated in conjunction with the retrofit project has no facilities for wheel washing and there is no regulatory requirement for providing such facilities. The existing ash handling procedures, which do include truck wheel washing, will be discontinued upon demolition of Emissions Units 001, and 002. We respectfully request that this new requirement for wheel wash facilities be removed.
2. Section III, Subsections A and B: Conditions A.45 and B.15 specify that Subsections A and B will become null and void in their entirety upon demolition of existing Emissions Unit Nos. 001, 002, 003, 004, and 005. Demolition of Units 003, 004, and 005 has already occurred. Demolition of Units 001, and 002, is expected to begin within the next 60 days. Accordingly, we have not conducted an in-depth review of these sections in anticipation that they will shortly become moot.
3. Section III, Subsection C, Condition C.6.1: Two new categories have been added to the list of materials that are prohibited. We are concerned that category (j), "untreated biomedical waste," may result in unnecessary confusion when assessing compliance.



consulting
engineering
construction
operations

Westshore Center
1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
Tel: 813 281-2900 Fax: 813 288-8787

RECEIVED
JAN 11 2001
BUREAU OF AIR REGULATION

January 3, 2001

Mr. Scott Sheplak, P.E.
Title V Administrator
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

Subject: McKay Bay Draft Title V Permit No. 050127-001-AV Application Modification

Dear Mr. Sheplak:

The purpose of this letter is to amend the City of Tampa's Title V Application for its McKay Bay Refuse-to-Energy Facility and provide comments on the draft Title V Permit.

Amendment Request

In keeping with the Department's guidance, the City wishes to amend Section 2 of Appendix A, "Precautions to Prevent Emissions of Unconfined Particulate Matter." The last bullet in that section states "the ash hauling trucks are equipped with tarps and subject to a wheel wash prior to leaving the site." The City of Tampa wishes to amend that statement to "The ash hauling trucks are equipped with tarps." The new ash handling facilities have been constructed without wheel wash facilities.

Draft Permit Comments

1. The emission units addressed in Subsections A and B have all been demolished. The City requests that these Subsections be deleted.
2. Section III, Subsection D, Condition D.9: Requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. This source is the ash handling building and system. No "maximum operation rate" for this particular source was requested or is specified in either the PSD or Title V application. As a practical matter, the system is either on or off. If an operation rate must be specified, this Condition should specify that "testing shall be conducted with all four combustion units running."
3. Section III, Subsection D, Condition D.11: This Condition is linked to Condition D9 and requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit.

Mr. Scott Sheplak, P.E.

January 3, 2001

Page 2

The applicable emission-limiting standard for this source is in units of percent opacity. Process weight input or heat input data are not appropriate or needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. This Condition should be deleted.

4. Section III, Subsection D, Condition D.14: Imposes the excess emissions and monitoring systems performance reporting requirements of 40 CFR 60.7. This particular emissions unit is not continuously monitored. Therefore, there would never be anything to report. Consequently, the City requests that this requirement be deleted.
5. Section III, Subsection E, Condition E.9: These sources are the two lime storage silos. This Condition requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. No maximum operation rate was specified in either the PSD Permit or the Title V Application. The City requests that the language in this Condition be changed to specify that "testing of emissions shall be conducted while pneumatically loading the silos at the normal operational loading rate."
6. Section III, Subsection E, Condition E.12: Requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit. The applicable emission-limiting standard is in units of percent opacity. Process weight input or heat input data are not appropriate or needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. The City requests that this Condition be deleted. As a practical matter, the operator has a financial incentive (e.g. saving the cost of the product and avoiding downtime due to clogging of the pneumatic conveyance system) to operate this equipment in a normal operational manner which serves to limit the capacity of the silo loading system.
7. Section III, Subsection F, Condition F.9: These sources are the two carbon storage silos. This Condition requires that testing be conducted between 90 to 100 percent of the maximum operation rate allowed by the permit. No "maximum operation rate" for this particular source was specified in the PSD Permit or requested in the Title V Application. The City requests that the language in this Condition be changed to specify that "testing of emissions shall be conducted while pneumatically loading the silos at the normal operational loading rate."
8. Section III, Subsection F, Condition F.12: Requires special equipment and instrumentation to determine process variables that are not applicable to this emissions unit. The applicable emission-limiting standard is in units of percent opacity. Process weight input or heat input data are not needed to determine the compliance of the emissions unit with the applicable emissions limiting standard. The City requests that this Condition be deleted. As a practical matter, the operator has a financial incentive (e.g. saving the cost of the product and avoiding downtime due to clogging of the pneumatic conveyance system) to operate this equipment in a normal operational matter which serves to limit the capacity of the silo loading system.

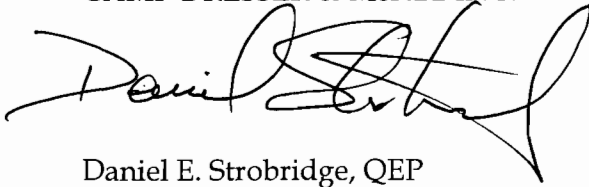
Mr. Scott Sheplak, P.E.
January 3, 2001
Page 3

Attached are the following:

- A revised Section 2 Appendix A,
- An Engineer's Certification,
- A Responsible Official Certification, and
- A letter designating Nancy McCann as the Responsible Official.

Very truly yours,

CAMP DRESSER & MCKEE INC.

A handwritten signature in black ink, appearing to read "Daniel Strobridge", written over the typed name and title.

Daniel E. Strobridge, QEP
Vice President

c: D. Dee
G. Grotecloss
J. Gorrie

Precautions to Prevent Emissions of Unconfined Particulate Matter

Precautions include the following:

- Roads, parking areas, and yards are paved.
- A street sweeper equipped with a vacuum system is used to remove particulate matter from roads and other paved areas.
- The unpaved areas of the facility are maintained and either sodded or landscaped.
- The boiler ash and grate siftings are quenched and wetted.
- The flyash is wetted in a pugmill ash conditioning system and then blended with the wet boiler ash and grate siftings.
- The wetted combined ash is processed for recyclable ferrous metals and stored in a building prior to loading into a truck for disposal.
- The ash hauling trucks are equipped with tarps.

4. Professional Engineer Statement:

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

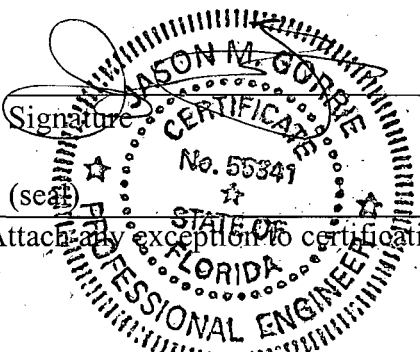
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions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

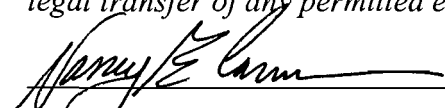
If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [], if so), I further certify that, with the exception of any changes detailed as part of this application, each such 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.

Signature _____
(seal) 

Date 1/8/01

* Attach any exception to certification statement.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: Nancy McCann
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: City of Tampa Street Address: 306 E. Jackson Street City Hall Plaza 5N City: Tampa State: Florida Zip Code: 33602
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (813) 274-8090 Fax: (813) 274-8035
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 [], 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>1/8/01</u>

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Jason Gorrie Registration Number: 55341
2. Professional Engineer Mailing Address: Organization/Firm: Camp Dresser & McKee Inc. Street Address: 1715 N. Westshore Boulevard/Suite 875 City: Tampa State: Florida Zip Code: 33607
3. Professional Engineer Telephone Numbers: Telephone: (813) 281-2900 Fax: (813) 288-8787



CITY OF TAMPA

Dick A. Greco, Mayor

November 4, 1997

NOV - 4 1997

Dr. Rick Garrity
Department of Environmental Protection of Hillsborough County
3804 Coconut Palm Drive
Tampa, FL 33619

Dear Dr. Garrity:

Please accept this letter as authorization for Nancy McCann, Urban Environmental Coordinator for the City of Tampa's Solid Waste Department to sign permit applications and other related documents pertaining to the McKay Bay Refuse-to-Energy Complex. Ms. McCann is the City's authorized representative for dealing with regulatory agencies on issues concerning the McKay Bay Refuse-to-Energy Complex.

Please contact Ms. McCann if any additional documentation is required. She can be reached at (813)274-8090.

Sincerely,

Dick A. Greco
Mayor

cc: Sam Halter, Chief Administrative Officer
Mike Salmon, Environmental Services/Public Works Projects Coordinator
Wayne Brookins, Director, Solid Waste Department
Nancy McCann, Urban Environmental Coordinator

FAX COVER SHEET

Office of Environmental Coordination
City of Tampa
306 E Jackson Street, 5N
Tampa, Florida 33602
FAX No. (813) 274-8035

To: Scott Sheplak, P.E.

From: Greig Grotecloss

Fax No.: (850) 922-6979

Tele No.: (813) 242-5408

Company: DEP-Title V Section

Date: 10/25/99

Tele No.: (850) 488-1344

Re: Permit No. 0570127-001-AV

Attached is a copy of the legal ad for the McKay Bay Refuse-To-Energy Facility draft Title V Permit and the proof of publication.

If you have any questions, please call me at (813) 242-5408.

***** PLEASE DELIVER THIS FAX IMMEDIATELY *****

TOTAL PAGES (INCLUDING COVER SHEET) 4

misc:fax.gg

THE TAMPA TRIBUNE
Published Daily
Tampa, Hillsborough County, Florida

State of Florida)
County of Hillsborough) ss.

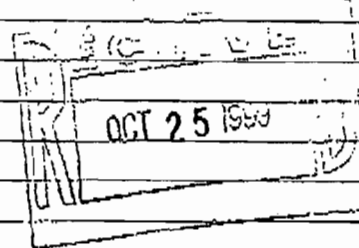
Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of _____

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of
OCTOBER 22, 1999



Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

J. Rosenthal

Sworn to and subscribed before me, this _____ 22 day
of _____ OCTOBER _____ A.D. 19⁹⁹

Personally Known _____ or Product Identification _____
Type of Identification Produced _____

(SEAL)

Susie Lee Slaton

**PUBLIC NOTICE OF INTENT
TO ISSUE TITLE V AIR
OPERATION PERMIT
STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION**

Title V DRAFT Permit No.:
0570127-001-AV

McKay Bay Refuse to Energy
Facility

Hillsborough County

The Department of Environmental Protection (permitting authority) gives notice of its intent to issue a Title V air operation permit to the City of Tampa for the McKay Bay Refuse-To-Energy Facility located at 107 North 34th Street, Tampa, Hillsborough County. The applicant's name and address are: City of Tampa, 306 East Jackson, Tampa, Florida 33602.

The permitting authority will issue the Title V PROPOSED Permit, and subsequent Title V FINAL Permit, in accordance with the conditions of the Title V DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The permitting authority will accept written comments concerning the proposed Title V DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the permitting authority shall issue a Revised DRAFT Permit and require, if applicable, another Public Notice.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 of the Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/488-9730; Fax: 850/487-4938). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of the notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the permitting authority 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 applicable 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 of the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the permitting authority'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; 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 petitioner's substantial rights will be affected by the agency determination;

(c) A statement or how and when the 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 state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;

(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 permitting authority'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, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority 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 for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day pub-

lic comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

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:

Permitting Authority:
 Department of Environmental Protection
 Bureau of Air Regulation
 111 South Magnolia Drive,
 Telephone: 850/488-0114
 Fax: 850/922-6979

Affected District/Local Program:
 Hillsborough County
 Environmental Protection Commission
 Air Quality Management Division
 1410 North 21st Street
 Tampa, Florida 33605
 Telephone: 813/272-5530
 Fax: 813/272-5605

The complete project file includes the DRAFT Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Scott M. Sheplak, P.E., at the above address, or call 850/921-9532, for additional information.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUL - 2 1982

REF: 4AW-AM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Richard D. Garrity, Ph.D
Urban Environmental Coordinator
City of Tampa
306 East Jackson Street
Tampa, Florida 33602

Re: PSD-FL-086

Dear Dr. Garrity:

Review of your July and October, 1981, applications to construct a municipal incinerator-cogeneration facility in Tampa, Florida has been completed. The construction is subject to rules for the Prevention of Significant Air Quality Deterioration (PSD) contained in 40 CFR 52.21. The Florida Department of Environmental Regulation performed the preliminary determination concerning the proposed construction and published a request for public comment on March 22, 1982. Comments were submitted by the City of Tampa, the Department of Interior, and the U. S. Environmental Protection Agency and are contained and responded to in the final determination issued May 28, 1982.

Authority to construct a stationary source is hereby granted for the facility described above, subject to the conditions in the permit to construct (enclosed). This authority to construct is based solely on the requirements of 40 CFR 52.21, the federal regulations governing significant deterioration of air quality. It does not apply to NPDES or other permits issued by this agency or by other agencies. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

This final permitting decision is subject to appeal under 40 CFR §124.19 by petitioning the Administrator of the U. S. EPA within 30 days after receipt of this letter of approval to construct. The petitioner must submit a statement of reasons for the appeal and the Administrator must decide on the petition within a reasonable time period. If the petition is denied, the permit becomes immediately effective. The petitioner may then seek judicial review.

Any questions concerning this approval may be directed to Richard S. DuBose, Chief, Air Engineering Section, Air and Waste Management Division at (404) 881-7654.

Sincerely yours,

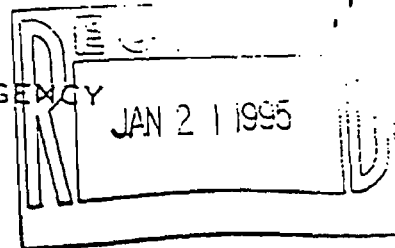
John A. Luth, Deputy
For Charles R. Jeter
Regional Administrator

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
343 COURTLAND STREET
ATLANTA, GEORGIA 30365



PERMIT TO CONSTRUCT UNDER THE RULES FOR THE
PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY

PSD-FL-086

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 U.S.C. §7470 et seq., and the regulations promulgated thereunder at 40 C.F.R. §52.21, as amended at 45 Fed. Reg. 52676, 52735-41 (August 7, 1980),

The City of Tampa
306 East Jackson Street
Tampa, Florida 33602

is hereby authorized to construct/modify a stationary source at the following location:

Adjacent McKay Bay
South of Florida Route 60
Tampa, Florida

UTM Coordinates: 360.0 km East, 3091.9 km North

Upon completion of this authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Specific Conditions (Part I) and General Conditions (Part II).

JUL 2 1982

This permit shall become effective on _____

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and Local law.

July 2, 1982

Date Signed

Charles R. Jeter, Deputy for
Charles R. Jeter
Regional Administrator

SPECIFIC CONDITIONS

1. The maximum allowable emissions from the resource recovery facility no. 1 shall be:

Pollutant	Emission Limitation
Sulfur dioxide	170.0 lb/hr
Nitrogen Oxides	300.0 lb/hr
Lead	3.1 lb/hr
Fluoride	6.0 lb/hr
Mercury (vaporous and particulate)	0.6 lb/hr
Beryllium	5 grams/24-hour period
	0.00046 lb/hr

- Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.
- Electric output for sale to Tampa Electric Company (TECO) shall not exceed 25 MW.
- Hours of operation for the facility shall be 24 hours per day, 7 days per week, 52 weeks per year.
- An operation and maintenance plan shall be submitted with the state operating permit application and be made part of this permit.
- Compliance testing for all criteria and NESBAPS pollutants shall be conducted in accordance with the methods contained in 40 CFR 60 and 61. A source testing plan shall be submitted to the Department of Environmental Regulation for approval 90 days prior to testing. The Department shall be notified of compliance testing at least 30 days prior to the testing.

7. The applicant shall record and keep on file the daily charging rate of the facility and the hours of operation of the facility and shall report this information quarterly to the permitting authority.

8. The applicant shall install and operate continuous opacity monitoring equipment.

GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such action and the estimated date of demonstration of compliance as required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records for all information resulting from monitoring activities and information indicating operating parameters as specified in the specific

conditions of this permit for a minimum of two (2) years from the date of recording.

5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within ten (10) business days of such conditions:

- (a) description of noncomplying emission(s).
- (b) cause of noncompliance,
- (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
- (d) steps taken by the permittee to reduce and eliminate the noncomplying emission,

and

- (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit

may then be made by the permitting authority to reflect any necessary changes in the permit conditions.

7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.

8. The permittee shall allow representatives of the State environmental control agency or representatives of the Environmental Protection Agency, upon the presentation of credentials:

- (a) To be allowed reasonable access to the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment of monitoring methods required in this permit;
 - (d) to sample at reasonable times any emission of pollutants;
- and
- (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.

9. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to:

Chief, Air Management Branch

U. S. Environmental Protection Agency

Region IV

345 Courtland Street

Atlanta, Georgia 30365

10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit shall constitute a violation of the terms and conditions of this permit.

Appendix H-1, Permit History/ID Number Changes

City of Tampa
McKay Bay Refuse-To-Energy

DRAFT Permit No.: 0570127-002-AV
Facility ID No.: 0570127

Permit History (for tracking purposes):

E.U. ID No	Description	Permit No.	Issue Date	Expiration Date	Extended Date ^{1,2}	Revised Date(s)
-001	MSW Incinerator #1	PSD-FL-086	7/2/82			
		AC29-47277	4/23/82	12/31/84		5/20/83, 11/7/86
		AO29-206279	9/1/92	8/1/97		
-002	MSW Incinerator #2	PSD-FL-086	7/2/82			
		AC29-47277	4/23/82	12/31/84		5/20/83, 11/7/86
		AO29-206279	9/1/92	8/1/97		
-003	MSW Incinerator #3	PSD-FL-086	7/2/82			
		AC29-47277	4/23/82	12/31/84		5/20/83, 11/7/86
		AO29-206279	9/1/92	8/1/97		
-004	MSW Incinerator #4	PSD-FL-086	7/2/82			
		AC29-47277	4/23/82	12/31/84		5/20/83, 11/7/86
		AO29-206279	9/1/92	8/1/97		
-005	Fly Ash Silo	PSD-FL-086(A)	4/1/98	3/31/2003		
-100	Ash Building & Handling System	PSD-FL-086(A)	4/1/98	3/31/2003		
-101	Lime Storage Silo	PSD-FL-086(A)	4/1/98	3/31/2003		
-102	Activated Carbon Storage Silo	PSD-FL-086(A)	4/1/98	3/31/2003		
-103	MSW Combustor & Auxiliary Burner – Unit 1	PSD-FL-086(A)	4/1/98	3/31/2003		
-104	MSW Combustor & Auxiliary Burner – Unit 2	PSD-FL-086(A)	4/1/98	3/31/2003		
-105	MSW Combustor & Auxiliary Burner – Unit 3	PSD-FL-086(A)	4/1/98	3/31/2003		
-106	MSW Combustor & Auxiliary Burner – Unit 4	PSD-FL-086(A)	4/1/98	3/31/2003		

(if applicable) ID Number Changes (for tracking purposes):

From: **Facility ID No.:**

To: **Facility ID No.:** 0570127

Notes:

1 - AO permit(s) automatic extension(s) in Rule 62-210.300(2)(a)3.a., F.A.C., effective 03/21/96.

2 - AC permit(s) automatic extension(s) in Rule 62-213.420(1)(a)4., F.A.C., effective 03/20/96.

{Rule 62-213.420(1)(b)2., F.A.C., allows Title V Sources to operate under existing valid permits that were in effect at the time of application until the Title V permit becomes effective}

Fold at line over top of envelope to

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Dick Greco, Mayor
 City of Tampa
 306 E. Jackson St.
 Tampa, FL 33602

4a. Article Number
 P 265 659 330

4b. Service Type
 Registered - Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 APR 14 1995

5. Received By: (Print Name)
 [Signature]

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 X

Thank you for using Return Receipt Service.

P 265 659 330

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to		Dick Greco
Street & Number		City of Tampa
Post Office, State, & ZIP Code		Tampa FL
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	4-9-95	
Notice of Pmt Correction		
0570127-002-AC		

PS Form 3800, April 1995



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

NOTICE OF PERMIT CORRECTION

In the Matter of an
Application for Permit

Mr. Dick Greco, Mayor
City of Tampa
306 E. Jackson Street
Tampa, Florida 33602

DEP File No. 0570127-002-AC
PSD-FL-086(A)

The Department has determined that several minor corrections to information contained in Final Permit Number 0570127-002-AC/PSD-FL-086(A) are required. These corrections are related to typographical errors, minor omissions, or result from the emissions unit number assignments of the Department's data management system. These corrections are minor in nature and do not alter, modify or revise any permit requirement. The corrections are:

The rule citations for condition B.8 of Section III (page 13 of 30) should read: [Rules 62-4.030 and 62-296.416, F.A.C., 40 CFR 60.33b and 40 CFR 60.34b, and request of applicant]

Condition B.11 of Section III (page 17 of 30) should include the following clarifying sentence at the end of the condition, and its citation should read: ...Test reports shall include the information required by 40 CFR 60.59b(f). [Rules 62-4.070(3), 62-297.310 and 62-204.800(8), F.A.C.; 40 CFR 60.38b, 40 CFR 60.58b and 40 CFR 60.59b]

The rule citations for condition B.19 of Section III (page 19 of 30) should read: [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., 40 CFR 60.59b and 40 CFR 60.44b(d)]

The rule citations for condition B.22 of Section III (page 22 of 30) should read: [Rule 62-210.370(3), F.A.C. and 40 CFR 60.59b(g) and, if applicable, 40 CFR 60.59b(h)]

The rule citations for condition B.25 of Section III (page 23 of 30) should read: [40 CFR 60.49b(a)(1) & (3) and 40 CFR 60.59b(b)]

The emissions unit identification numbers have been changed from those specified in the permit because of the requirements of the Department's data management system. The emissions unit numbers referred to on pages 7, 8, 25 and 27 (of 30) have been changed as follows:

ORIGINAL EMISSIONS UNIT NO.	NEW EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
001	103	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 1
002	104	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 2
003	105	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 3
004	106	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 4
006	100	Ash Building and Handling System
007	101	Lime Silo
008	102	Carbon Silo

Please refer to the new numbers when making records or when corresponding with the Department.

This permit correction corrects and is a part of Final Permit Number 0570127-002-AC/PSD-FL-086(A). This permit correction is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit correction) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice 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 PERMIT CORRECTION (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4-9-98 to the person(s) listed:

Dick Greco, Mayor, City of Tampa *
Daniel Kleman, Hillsborough County Administrator
Brian Beals, EPA
John Bunyak, NPS
Douglas W. Fredericks, P.E., CDM
Don Elias, RTP
David S. Dee, Landers & Parsons
Jerry Campbell, HCEPC
Bill Thomas, DEP SWD

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.

Keri Jober
(Clerk)

4-9-98
(Date)

is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Mr. Dick Greco, Mayor
 City of Tampa
 306 E. Jackson St.
 Tampa, FL 33602

4a. Article Number
 P 265 659 324

4b. Service Type

Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)
 X

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Thank you for using Return Receipt Service.

Domestic Return Receipt

P 265 659 324

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	DICK GRECO
Street & Number	CITY OF TAMPA
Post Office, State & ZIP Code	TAMPA FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	0570127-002 AC 4-1-98 P3D-FI-086(A)

PS Form 3800, April 1995

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit

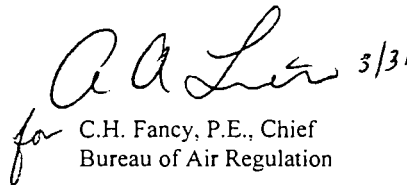
Mr. Dick Greco, Mayor
City of Tampa
306 E. Jackson Street
Tampa, Florida 33602

DEP File No. 0570127-002-AC
PSD-FL-086(A)

Enclosed is the FINAL Permit Number 0570127-002-AC/PSD-FL-086(A). This construction permit is to: replace and improve the air pollution control system; add natural gas auxiliary burners for improved combustion control; define process throughput parameters; increase amount of waste that can be burned on a short-term basis, and specify which materials can be burned at its solid waste energy recovery facility located at 107 North 34th Street, Tampa, Hillsborough County, Florida. A review for the Prevention of Significant Deterioration (PSD) and Best Available Control Technology determination were not required pursuant to Rule 62-212.400. and 410., F.A.C., as potential emissions will not significantly increase as a result of this project. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

 3/31
for C.H. Fancy, P.E., Chief
Bureau of Air Regulation

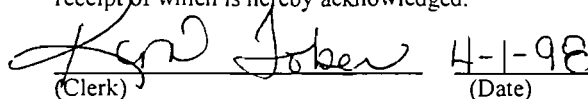
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this 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 4-1-98 to the person(s) listed:

Dick Greco, Mayor, City of Tampa *
Daniel Kleman, Hillsborough County Administrator
Brian Beals, EPA
John Bunyak, NPS
Douglas W. Fredericks, P.E., CDM
Don Eliás, RTP
David S. Dee, Landers & Parsons
Jerry Campbell, HCEPC
Bill Thomas, DEP SWD

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.

 4-1-98
(Clerk) (Date)

FINAL DETERMINATION

City of Tampa
McKay Bay Refuse-to-Energy Facility
Tampa, Florida
Hillsborough County

Air Construction Permit No. 0570127-002-AC
PSD-FL-086(A)

An Intent to Issue an air construction permit for City of Tampa, McKay Bay Refuse-to-Energy Facility located at 107 North 34th Street, Tampa, Hillsborough County, Florida was distributed on February 5, 1998. The Public Notice of Intent to Issue Air Construction Permit was published in The Tampa Tribune on February 18, 1998. Comments were submitted in response to the public notice.

Comments were received by telephone from the City's Attorney, David Dee of Landers and Parsons, and the City's Consultants, Dan Strobridge of CDM and Don Elias of RTP Environmental Associates Inc., primarily related to identifying typographical errors or minor points of clarification. These changes were all made in the final permit. Written comments were received from Dan Strobridge of CDM related to revising limitations expressed in terms of pounds per hour and pounds per million Btu for the pollutants mercury, hydrochloric acid and sulfur dioxide; revising the steam production calculation, which was originally calculated by another of the City's consultants using the wrong fuel heating value basis; and deleting reference to dry activated carbon so that a slurry may be used. These changes were made.

Several details of the Technical Evaluation and Preliminary Determination require revision, primarily to correct typographical errors or for clarification. The first paragraph on page 6 of 17 refers to Pasco County's facility, but should have referred to Pinellas County. The definition of allowable wastes discussed starting on page 6 did not exactly match the language of the permit; the permit language was also slightly revised for clarity, so the permit properly reflects the Department's intent with respect to the definition of allowable wastes for this facility. The fourth paragraph of the Process Description on page 9 should have referred to combustion air drawn into "... the refuse-fired combustors where the waste is burned." The table of proposed limits in section 6.1 on page 12 has been revised to delete references to the "not to exceed" values for sulfur dioxide, mercury and hydrogen chloride. Hydrogen chloride in this table should have been listed as hydrochloric acid to match the permit. The revised table now appears:

POLLUTANT	PERMITTED LIMIT	PROPOSED LIMIT
Particulate Matter (PM)	0.025 gr/dscf @ 12% CO ₂ and 27.9 lb/hr (all four units combined)	0.012 gr/dscf @ 7% O ₂
Sulfur Dioxide (SO ₂)	170.0 lb/hr (all four units combined)	29 ppmdv @ 7% O ₂ or 75% removal (24-hr)
Nitrogen Oxides (NO _x)	300.0 lb/hr (all four units combined)	205 ppmdv @ 7% O ₂ (24-hr)
Carbon Monoxide (CO)	None	100 ppmdv @ 7% O ₂ (4-hr)
Volatile Organic Compounds (VOC)	9.0 lb/hr (all four units combined)	none - CO is surrogate
Lead (Pb)	3.1 lb/hr (all four units combined)	440 ug/dscm @ 7% O ₂

(Table continued next page.)

POLLUTANT	PERMITTED LIMIT	PROPOSED LIMIT
Mercury (Hg)	0.6 lb/hr (all four units combined)	70 ug/dscm @ 7% O ₂ or 85% removal
Cadmium (Cd)	None	40 ug/dscm @ 7% O ₂
Beryllium (Be)	0.00046 lb/hr (all four units combined)	0.000115 lb/hr
Hydrochloric Acid (HCl)	None	29 ppmdv @ 7% O ₂ or 95% removal
Hydrogen Fluoride (HF)	6.0 lb/hr (all four units combined)	1.5 lb/hr
Dioxins/Furans	None	30 ng/dscm @ 7% O ₂

The Control Technology Assessment starting on page 13 erroneously refers to the capacity of the Pasco County facility as 900 TPD, although the facility is actually rated at 1050 TPD. Thus, the projected future actual emissions for PM and fluoride are improperly stated. Adjusting for the error, the equivalent emissions of PM from the McKay Bay facility would be less than 3 TPY, leading to a future actual decrease in emissions of PM of more than 33 TPY; annual estimated emissions of HF are 0.8 TPY. The first paragraph of section 7.2 refers to the technology for control of acid gases as a specific requirement of the emission guideline; it should have stated that the technology was used as the basis for the emission limits of the emission guideline. The last sentence of section 7.4 should read, "The SNCR system will reduce NO_x actual emissions substantially from the current uncontrolled levels." Section 7.5 refers to injecting dry activated carbon for mercury control, although it was not the Department's intention to prohibit the use of slurry activated carbon. The reference to the absolute limit of 135 ug/dscm is no longer applicable, because that limit has been removed from the permit.

The RACT evaluation of section 8 refers to dust generation from the ash handling facility, and states that all portions of the facility with potential for fugitive emissions will be enclosed. In actuality, many portions of the facility with substantial potential for fugitive emissions will be enclosed.

The City's Consultants, Dan Strobridge of CDM and Don Elias of RTP Environmental Associates Inc. verbally requested the permit specify that PM testing using EPA Method 5 utilize the front-half catch of the sampling train. The Department considered this request and determined that this change was not required. The Department agrees that EPA Method 5 is a front-half catch method, and measurement of particulate matter captured in the back half is not required for this source, because the emissions limited pollutant is particulate matter as defined in 40 CFR 60.51b which refers specifically to EPA Reference Method 5. To further clarify that the emissions limited pollutant is particulate matter, specific condition B.8 has been changed to refer only to PM, not PM₁₀, and the requirements for particulate matter testing from 40 CFR 60.58b(c)(3) have been added to specific condition B.10.

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

/jk



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

PERMITTEE:

City of Tampa
McKay Bay Refuse-to-Energy Facility
306 East Jackson
Tampa, Florida 33602

ID No.	0570127
Permit No.	0570127-002-AC
PSD No.	PSD-FL-086(A)
SIC No.	4953
Expires:	March 31, 2003

Authorized Representative:

Mr. Dick Greco
Mayor

PROJECT AND LOCATION:

This permit allows the applicant to substantially replace or rebuild the existing municipal waste combustion facility. This retrofit project will upgrade the existing four mass-burn combustion units to achieve greater combustion control and improve combustion efficiency, as well as replace air pollution control equipment, to comply with the emission limits and monitoring requirements of the Federal emission guidelines for large municipal waste combustors, 40 CFR 60 Subpart Cb. Each municipal waste combustion unit will not exceed a short-term tonnage capacity of 288 TPD and maximum heat input of 120 million Btu per hour (mmBtu/hr), 104 mmBtu/hr, nominal. These capacities are not limited by this permit. This permit limits each unit's maximum steam flow to 79,300 pounds per hour, and limits long-term (nominal) capacity to 250 TPD, rolling 12-month average.

The facility is located at 107 North 34th Street, Tampa, Hillsborough County. The UTM coordinates of this facility are Zone 17 ; 360.0 km E ; 3091.9 km N.

STATEMENT OF BASIS:

This construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The above named permittee is authorized to modify the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

Attached appendix is part of this permit:

Appendix GC Construction Permit General Conditions

Howard L. Rhodes, Director
Division of Air Resources
Management

AIR CONSTRUCTION PERMIT 0570127-002-AC, PSD-FL-086(A)

SECTION I. FACILITY INFORMATION

SUBSECTION A. FACILITY DESCRIPTION

This existing facility consists of four mass-burn combustion units, each with a nominal capacity to combust 250 tons per day (TPD) when burning solid waste with a heat content of 5,000 British thermal units (BTU) per pound (lb). Therefore, the facility has a nameplate (nominal) waste processing rate of 1,000 TPD (5,000 Btu/lb). The heat input to each unit is 104 mmBtu/hr nominal. The facility generates electricity, and has an electrical generator with a nameplate rating of 22.5 megawatts for the entire facility. Each upgraded air pollution system will consist of a spray dryer absorber (SDA), fabric filter baghouse (FF), activated carbon injection (ACI) unit, and a selective non-catalytic reduction (SNCR) system.

This permit allows the applicant to substantially replace or rebuild the existing municipal waste combustion facility. This retrofit project will upgrade the existing four mass-burn combustion units to achieve greater combustion control and improve combustion efficiency, as well as replace air pollution control equipment, to comply with the emission limits and monitoring requirements of the Federal emission guidelines for large municipal waste combustors, 40 CFR 60 Subpart Cb. Each municipal waste combustion unit will not exceed a short-term tonnage capacity of 288 TPD and maximum heat input of 120 million Btu per hour (mmBtu/hr), 104 mmBtu/hr, nominal. These capacities are not limited by this permit. This permit limits each unit's maximum steam flow to 79,300 pounds per hour, and limits long-term (nominal) capacity to 250 TPD, rolling 12-month average.

A general description of this project is as follows: The existing grate furnaces, rotary kilns, electrostatic precipitators and ID fans will be replaced. New boiler systems will be installed to recover heat from the waste combustion. The boiler tubes may be integral to the furnace design (waterwall furnace) or may be constructed to recover heat by convective heat transfer (as with a refractory furnace with waste heat boiler). The existing waste heat boilers may be reused in the new boiler systems. The new air pollution control equipment for each line consists of a spray dryer absorber, a fabric filter, and activated carbon injection system. A selective non-catalytic reduction system (SNCR) and auxiliary gas burners will be installed in the furnaces. The two existing 165-foot stacks will be replaced with a single, multi-flued stack, 201 feet tall. New bottom ash and fly ash handling systems will be installed, and a new ash storage building will be constructed. Fugitive ash emissions will be controlled by enclosing the ash transfer and storage system.

Natural gas fired auxiliary burners and combustion control systems with continuous monitoring devices for combustion and process parameters and SO₂, NO_x and CO will be installed to improve combustion efficiency and control.

AIR CONSTRUCTION PERMIT 0570127-002-AC, PSD-FL-086(A)

SECTION I. FACILITY INFORMATION

In addition to the physical changes described above, the permit: specifies steam flow as the main process throughput parameter to be monitored; establishes maximum steam flow at 79,300 pounds per hour (at a net steam energy of 1103 Btu/lb -- the net steam energy, which is the difference in enthalpy of the steam and the feedwater, is not required to be regularly calculated or monitored by this permit); provides for combustion of segregated waste streams and defines more precisely the types of wastes that may be burned; removes the VOC limitations imposed by the current operation permit; and specifies the requirements of the emission guidelines for fugitive PM emissions from the ash handling and storage processes, which constitute MACT, be substituted for the PM RACT requirements of Rule 62-296.711, F.A.C. (Materials Handling), pursuant to Rule 62-296.711(2)(c), F.A.C.

SUBSECTION B. REGULATORY CLASSIFICATION

This facility is listed in Table 62-212.400 of Chapter 62-212, F.A.C., "Major Facilities Categories". Stack and fugitives emissions of over 100 tons per year of particulate matter, carbon monoxide, volatile organic compounds, sulfur dioxide, and nitrogen oxides, characterize the installation as a major facility. The installation of the new air pollution control system will not subject this facility to PSD review under the requirement of Rule 62-212.400, F.A.C., since there is not an increase in actual emissions. As a Resource Recovery Facility (waste-to-energy facility), the affected emissions units are subject to applicable requirements of Rule 62-296.416, F.A.C. Waste to Energy, and Rule 62-204.800, F.A.C., which incorporates 40 CFR 60 Subpart Db, Subpart Cb, Subpart E, and the requirements of Subpart Eb specified by Subpart Cb.

SUBSECTION C. PERMIT SCHEDULE:

- February 18, 1998, notice of intent published in The Tampa Tribune
- January 29, 1998, issued notice of intent to issue permit
- November 13, 1997, application deemed complete

SUBSECTION D. RELEVANT DOCUMENTS:

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department.

Application received (Bureau of Air Regulation) on September 16, 1997

Department's letter dated October 14, 1997

Information submitted by the City's consultant and attorney received October 31, November 13, December 16, December 22, 1997, January 12, 15, and 21, 1998

Project: Facility Improvements
Facility ID No. 0570127
SIC: 4953

City of Tampa
McKay Bay Refuse-to-Energy Facility
Tampa, Florida

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION A. ADMINISTRATIVE

- A.1 Regulating Agencies: All documents related to applications for permits to construct, operate or modify an emissions unit should be submitted to the Bureau of Air Regulation (BAR), Florida Department of Environmental Protection (FDEP) at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and phone number 850/488-1344. All documents related to reports, tests, and notifications should be submitted to the Department's Southwest District office (DEPSWD), 3804 Coconut Palm Drive, Tampa, Florida 33619 and phone number 813/744-6100 and the Hillsborough County Environmental Protection Commission (HCEPC), 1900 Ninth Avenue, Tampa, Florida 33605 and phone number 813/272-5960.
- A.2 General Conditions: The owner and operator is subject to and shall operate under the attached General Permit Conditions G.1 through G.15 listed in Appendix GC of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes. [Rule 62-4.160, F.A.C.]
- A.3 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.
- A.4 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. [Rule 62-210.900, F.A.C.]
- A.5 Application for Title V Permit: An application for a modification of the Title V operating permit, pursuant to Chapter 62-213, F.A.C., must be submitted to the DEP's Bureau of Air Regulation, and a copy to DEPSWD and HCEPC. [Chapter 62-213, F.A.C.]
- A.6 New or Additional Conditions: Pursuant to Rule 62-4.080, F.A.C., for good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

SUBSECTION B. CONSTRUCTION REQUIREMENTS

B.1 Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit (s) shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of Chapter 403, F.S. and Florida Administrative Code Chapters 62-4, 62-103, 62-204, 62-212, 62-213, 62-296, 62-297 and the Code of Federal Regulations Section 40, Part 60, adopted by reference in the Florida Administrative Code (F.A.C.) regulations [Rule 62-204.800, F.A.C.]. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting or regulations [Rule 62-210.300, F.A.C.]

SUBSECTION C. OPERATIONAL REQUIREMENTS

- C.1 Changes/Modifications: The owner or operator shall submit to the Department's Bureau of Air Regulation, for review any changes in, or modifications to: the method of operation; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain, an air construction permit prior to making the desired change. *Routine maintenance of equipment will not constitute a modification of this permit.* [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]
- C.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the owner or operator shall notify the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]
- C.3 Operating procedures shall include good combustion practices and proper training and certification of all operators. The good combustion practices shall meet the guidelines established in 40 CFR 60, Subpart Cb and procedures as established by recognized industry standards. All operators (including supervisors) of air pollution control device shall be properly trained and certified in plant specific equipment. A list of all such certified personnel shall be submitted to the Department's Southwest District office (DEPSWD) and

SECTION II. EMISSION UNIT(S) GENERAL REQUIREMENTS

the Hillsborough County Environmental Protection Commission (HCEPC). Department's staff shall be given notice of any formal training sessions related to operation and maintenance of air pollution control devices. [Rule 62-204.800(8), F.A.C. and 62-4.070 (3), F.A.C.]

- C.4 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Air Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in **Rule 62-297.620, F.A.C.**

SUBSECTION D. MONITORING OF OPERATIONS

Determination of Process Variables

- D.1 The permittee shall operate and maintain equipment and/or instruments necessary to determine process variables, such as heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- D.2 Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weigh hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

SUBSECTION E. OTHER REQUIREMENTS

- E.1 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid, and hazardous wastes in accordance with all applicable Federal, State, and Local regulations. This air pollution permit does not relieve the permittee from securing any other types of required permits, licenses, or certifications.

AIR CONSTRUCTION PERMIT 0570127-002-AC, PSD-FL-086(A)

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION A. 40 CFR 60, NSPS, GENERAL PROVISIONS

The following emission limitations shall apply to each affected emissions unit after the proposed improvements to comply with 40 CFR 60 Subpart Cb are made and compliance testing is completed. This section addresses the following emissions units:

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
001	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 1
002	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 2
003	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 3
004	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 4
006	Ash Building and Handling System

{Note: Each unit will have a short term tonnage capacity of 288 tons of waste per day and a maximum heat input capacity of 120 mmBtu/hr. Nominal heat input capacity is 104 mmBtu/hr. These capacities are not limited by this permit. Instead the nominal capacity is limited to 250 tons of waste per day, as determined by a rolling 12 month average. Short-term capacity is limited by limiting steam production, which effectively limits heat input.}

The affected emissions units shall comply with all applicable requirements of 40 CFR 60, General Provisions, Subpart A, after improvements to comply with 40 CFR 60 Subpart Cb are completed.

- A.1 [40 CFR 60.7, Notification and record keeping]
- A.2 [40 CFR 60.8, Performance tests]
- A.3 [40 CFR 60.11, Compliance with standards and maintenance requirements]
- A.4 [40 CFR 60.12, Circumvention]
- A.5 [40 CFR 60.13, Monitoring requirements]
- A.6 [40 CFR 60.19, General notification and reporting requirements]

The affected emissions units shall comply with all applicable provisions of the 40 CFR 60, Subpart E, New Source Performance Standards for Incinerators, and Subpart Cb, Emissions Guidelines for Existing Municipal Waste Combustors, along with applicable requirements of Subpart Db, New Source Performance Standards for Steam Generating Units, 40 CFR 61.30, Subpart C, NESHAP for Beryllium and Rule 62-296.416, F.A.C., Waste-to-Energy Facilities. In addition these emissions units shall also comply with all the conditions listed in Section II (Emissions Unit General Requirements) of this permit.

[Rule 62-4.070(3), 62-204.800(8) and 62-296-416, F.A.C.]

{Note: This project is subject to the requirements of 40 CFR 60, Subpart Cb. This permit may refer to the requirements of 40 CFR 60, Subpart Eb where these requirements are referenced by Subpart Cb.}

Project: Facility Improvements
Facility ID No. 0570127
SIC: 4953

City of Tampa
McKay Bay Refuse-to-Energy Facility
Tampa, Florida

AIR CONSTRUCTION PERMIT 0570127-002-AC, PSD-FL-086(A)

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION B. SPECIFIC CONDITIONS:

The following specific conditions apply to the following emissions units after improvements to comply with 40 CFR 60 Subpart Cb are completed.

EMISSIONS UNIT No.	EMISSIONS UNITS DESCRIPTION
001	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 1
002	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 2
003	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 3
004	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 4

{Note: Each unit will have a short term tonnage capacity of 288 tons of waste per day and a maximum heat input capacity of 120 mmBtu/hr. Nominal heat input capacity is 104 mmBtu/hr. These capacities are not limited by this permit. Instead the nominal capacity is limited to 250 tons of waste per day, as determined by a rolling 12 month average. Short-term capacity is limited by limiting steam production, which effectively limits heat input.}

OPERATIONAL REQUIREMENTS

- B.1 The combustor boilers shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, and rated capacity.
- B.2 Process Operating Rates: Each of the four municipal waste combustor units (MWCs) shall have a maximum rated capacity of 79,300 pounds of steam produced per hour based on a 4-hour block averaged measurement, with a net steam energy of 1103 Btu/lb of steam (the net steam energy may be calculated as the difference in enthalpy between the steam at the superheater outlet and the feedwater at the inlet). This capacity shall not be exceeded. Additionally, each unit shall not be charged with more than 250 tons of waste per day, as determined by a rolling 12 month average.
[Rules 62-4.030(3) and 62-204.800(8), F.A.C., 40 CFR 60.31b, 60.38b, 60.51b, and 60.58b(j)]
- B.3 Load Level: *Unit load* means the steam load of the municipal waste combustor (MWC) measured as specified in 40 CFR 60.58b(i)(6). Compliance with load level requirements shall be determined by a steam meter using ASME Power Test Code for Steam Generating Units, Power Test Code 4.1, section 4 (see 40 CFR 60.58b(i)(6)(ii) & (iii)). Each MWC unit shall not operate at a load level greater than 110 percent of the unit's *maximum demonstrated unit load* based on 4-hour block averaged measurements of steam flow. The maximum demonstrated unit load is the highest arithmetic averaged measurement of steam flow recorded for four consecutive hours during the most recent dioxin/furan performance stack test in which compliance with the dioxin/furan emission limit was achieved. Higher loads

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

are allowed for testing purposes as specified at 40 CFR 60.53b(b) and condition D.7 of this permit.

[Rule 62-204.800(8), F.A.C., 40 CFR 60.31b; 60.38b; 60.51b; 60.53b(b); and 60.58b(i) (6)&(8)]

B.4 Emission Control Equipment

Particulate Matter

Each unit shall be equipped with a particulate control baghouse designed, constructed and operated so as not to exceed a maximum emission rate of 27 mg/dscm corrected to 7 percent O₂. These baghouses shall be equipped with pressure drop monitoring equipment.

Spray Dryer Scrubber

Each unit shall be equipped with a spray dryer scrubber designed, constructed and operated so as to remove SO₂ at an efficiency of 75 percent, or not to exceed a maximum emission rate of 29 ppm_{dv} corrected to 7 percent O₂, 24-hour block geometric mean, whichever is less stringent.

Carbon Injection

Each unit shall be equipped with a carbon injection system. The carbon injection rate must be estimated and maintained in compliance with the requirements set forth in 40 CFR 60.58b(m).

Selective Non Catalytic Reduction System

Each unit shall be equipped with a selective non catalytic reduction system designed, constructed and operated so as not to exceed a maximum NO_x emission rate of 205 ppm_{dv} corrected to 7 percent O₂, 24-hour block arithmetic mean (midnight to midnight).

Within 30 days after it becomes available, but before commencement of construction of the air pollution control equipment, the Permittee shall submit to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) copies of technical data pertaining to the selected emission control systems. This data should include, but not be limited to guaranteed efficiency and emission rates, and major design parameters.

B.5 Stack Height: The height of the boiler exhaust stack shall not be less than 201 feet above grade.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

B.6 Fuels

The primary fuel for the facility is municipal solid waste (MSW), including the items and materials that fit within the definition of MSW contained in either 40 CFR 60.51b or Section 403.706(5), Florida Statutes (1995).

[Rule 62-4.070(3), F.A.C., and request of applicant]

B.6.1 Subject to the limitations contained in this permit, the authorized fuels for the facility also include the other solid wastes that are not MSW which are described below. However, the facility shall not burn:

- (a) those materials that are prohibited by state or federal law;
- (b) those materials that are prohibited by this permit;
- (c) lead acid batteries;
- (d) hazardous waste;
- (e) nuclear waste;
- (f) radioactive waste;
- (g) sewage sludge;
- (h) explosives.

B.6.2 The fuel may be received either as a mixture or as a single-item stream (segregated load) of discarded materials. If the facility intends to use an authorized fuel that is segregated non-MSW material, the fuel shall be either:

- (a) well mixed with MSW in the refuse pit; or
- (b) alternately charged with MSW in the hopper.

B.6.3 The facility operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received and used as fuel at the facility, and subject to a percentage weight limitation, below (B.6.6. and B.6.7). For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of waste material, as determined by visual observation.

B.6.4 To ensure that the facility's fuel does not adversely affect the facility's combustion process or emissions, the facility operator shall:

- (a) comply with good combustion operating practices in accordance with 40 CFR 60.53b;

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- (b) install, operate and maintain continuous emissions monitors (CEMS) for oxygen, carbon monoxide, sulfur dioxide, oxides of nitrogen and temperature in accordance with 40 CFR 60.58b; and
- (c) record and maintain the CEMS data in accordance with 40 CFR 60.59b.

These steps shall be used to ensure and verify continuous compliance with the emissions limitations in this permit.

Natural gas may be used as fuel during warm-up, startup, shutdown, and malfunction periods, and at other times when necessary and consistent with good combustion practices.

B.6.5 Subject to the conditions and limitations contained in this permit, the following other solid waste may be used as fuel at the facility:

- (a) Confidential, proprietary or special documents (including but not limited to business records, lottery tickets, event tickets, coupons and microfilm);
- (b) Contraband which is being destroyed at the request of appropriately authorized local, state or federal governmental agencies, provided that such material is not an explosive, a propellant, a hazardous waste, or otherwise prohibited at the facility. For the purposes of this section, contraband includes but is not limited to drugs, narcotics, fruits, vegetables, plants, counterfeit money, and counterfeit consumer goods;
- (c) Wood pallets, clean wood, and land clearing debris;
- (d) Packaging materials and containers;
- (e) Clothing, natural and synthetic fibers, fabric remnants, and similar debris, including but not limited to aprons and gloves; or
- (f) Rugs, carpets, and floor coverings, but not asbestos-containing materials or polyethylene or polyurethane vinyl floor coverings.

B.6.6 Subject to the conditions and limitations contained in this permit, waste tires may be used as fuel at the facility. The total quantity of waste tires received as segregated loads and burned at the facility shall not exceed 3%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined by using a rolling 30 day average in accordance with specific condition B.24 below.

B.6.7 Subject to the conditions and limitations contained in this permit, the following other solid waste materials may be used as fuel at the facility (i.e. the following are authorized fuels that are non-MSW material). The total quantity of the following non-MSW material received as segregated loads and burned at the facility shall not exceed 5%, by weight, of

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

the facility's total fuel. Compliance with this limitation shall be determined by using a rolling 30 day average in accordance with specific condition B.24 below.

- (a) Construction and demolition debris.
- (b) Oil spill debris from aquatic, coastal, estuarine or river environments. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (c) Items suitable for human, plant or domesticated animal use, consumption or application where the item's shelf-life has expired or the generator wishes to remove the items from the market. Such items or materials include but are not limited to off-specification or expired consumer products, pharmaceuticals, medications, health and personal care products, cosmetics, foodstuffs, nutritional supplements, returned goods, and controlled substances.
- (d) Consumer-packaged products intended for human or domesticated animal use or application but not consumption. Such items or materials include but are not limited to carpet cleaners, household or bathroom cleaners, polishes, waxes and detergents.
- (e) Waste materials that:
 - (i) are generated in the manufacture of items in categories (c) or (d), above and are functionally or commercially useless (expired, rejected or spent); or
 - (ii) are not yet formed or packaged for commercial distribution. Such items or materials must be substantially similar to other items or materials routinely found in MSW.
- (f) Waste materials that contain oil from:
 - (i) the routine cleanup of industrial or commercial establishments and machinery; or
 - (ii) spills of virgin or used petroleum products. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (g) Used oil and used oil filters. Used oil containing a PCB concentration equal or greater than 50 ppm shall not be burned, pursuant to the limitations of 40 CFR 761.20(e).
- (h) Waste materials generated by manufacturing, industrial or agricultural activities, provided that these items or materials are substantially similar to items or materials that are found routinely in MSW, subject to prior approval of the Department.

B.7 Startup/Shutdown/Malfunctions

- (a) The emission limitations for this facility shall apply at all times, except during periods of warm-up, startup, shutdown, or malfunctions, provided that the duration of startup, shutdown, or malfunction periods do not exceed 3 hours per occurrence. The duration of warm-up periods is not limited. The startup period commences when the affected facility begins the continuous burning of waste and does not include any warm-up period when the affected facility is combusting only natural gas and waste is not being introduced to the combustor. The use of waste solely to provide thermal protection to the grate during

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

the warm-up periods when waste is not being fed to the combustor is not considered to be continuous burning. During all startups, shutdowns, and malfunctions, the owner/operator shall use best operational practices to minimize air pollutant emissions.

(b) A malfunction means any unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Excess emissions that are caused entirely or in part by poor maintenance, careless operation, any other preventable upset condition, or preventable equipment breakdown shall not be considered malfunctions. Excess emissions resulting from startup, shutdown or malfunction of any source shall be permitted providing: (1) best operational practices to minimize emissions are adhered to, and (2) the duration of excess emissions shall be minimized but in no case exceed 3 hours per occurrence.

[Rule 62-210.700, and 62-204.800(8), F.A.C., and 40 CFR 60.58b(a)(1)]

EMISSION LIMITATIONS & STANDARDS

B.8 Emissions from each MWC unit shall not exceed the limits listed in the following table. [Rules 62-4.030 and 62-296.416, F.A.C., 40 CFR 60.52b and 40 CFR 60.53b(b), and request of applicant]

POLLUTANT	EMISSION STANDARDS			
	Emission Guideline Limits	lb/mmBtu	lb/hr	ton/yr
PM ⁽¹⁾ Particulate Matter	27 mg/dscm, corrected to 7% O ₂	0.0230	2.76	12.1
VE Visible Emissions	10% (6 minute average)			
Cd Cadmium	0.040 mg/dscm corrected to 7% O ₂	3.42E-05	4.10E-03	0.0179
F Fluoride (as HF)	1.5 lb/hr	0.0125	1.5	6.57
Be ⁽²⁾ Beryllium	0.000115 lb/hr	9.58E-07	1.15E-04	5.04E-04
Pb Lead	440 ug/dscm corrected to 7% O ₂	3.76E-04	0.0451	0.197
Hg Mercury	70 ug/dscm corrected to 7% O ₂ or 85% reduction by weight (whichever is less stringent)	NA	NA	0.0605
SO ₂ Sulfur Dioxide	29 ppmv corrected to 7% O ₂ or 75% reduction by weight or volume (whichever is less stringent)	NA	NA	See Below ⁽³⁾
HCl Hydrochloric Acid	29 ppmv corrected to 7% O ₂ or 95% reduction by weight or volume (whichever is less stringent)	NA	NA	67.9

(This table is continued on the next page.)

AIR CONSTRUCTION PERMIT 0570127-002-AC, PSD-FL-086(A)

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

POLLUTANT	EMISSION STANDARDS, CONTINUED			
	Emission Guideline Limits	lb/mmBtu	lb/hr	ton/yr
Dioxins/Furans	30 ng/dscm (total mass) corrected to 7% O ₂	2.56E-08	3.07E-06	1.35E-05
CO Carbon Monoxide	100 ppmdv corrected to 7% O ₂	0.0995	11.9	See Below ⁽⁴⁾
NO _x ⁽³⁾ Nitrogen Oxides	205 ppmdv corrected to 7% O ₂	0.335	40.1	See Below ⁽⁴⁾

Emissions from the facility shall not exceed the limits listed in the following table.

POLLUTANT ⁽⁴⁾	EMISSION STANDARDS	EMISSION LIMIT (Tons in any consecutive 12-month period)
SO ₂ Sulfur Dioxide	Emissions shall not to exceed 460 tons in any consecutive 12 month period	460
CO Carbon Monoxide	Emissions shall not to exceed 185 tons in any consecutive 12 month period	185
NO _x Nitrogen Oxides	Emissions shall not to exceed 679 tons in any consecutive 12 month period	679

Notes to tables:

- (1) This limit for PM is more restrictive than the emission limit for PM in 40 CFR 60.43b (Subpart Db).
 - (2) The limit for Beryllium is more stringent than that imposed by the NESHAP, 40 CFR 61.32 (a) (Subpart C). This limit will remain the same as specified in previous permits.
 - (3) The NO_x standard of 40 CFR 60.44b does not apply to these emissions units because this permit subjects this facility to a federally enforceable requirement that limits the facility to an annual capacity factor of 10 percent or less for natural gas.
 - (4) Emissions of sulfur dioxide, carbon monoxide and nitrogen oxides are limited on a facility-wide basis to limit emission increases below PSD significance levels.
- NA Standards expressed in terms of lb/mmBtu and lb/hr are not applicable to these pollutants.

Basis: Emissions calculations (lb/hr and ton/yr) are based on the maximum heat input rate of 120 mmBtu/hr (79,300 lb steam/hr) per unit and 8760 hours of operation.

Averaging Times

- *SO₂: 24-hour daily block geometric mean (midnight to midnight).
- NO_x: 24-hour daily block arithmetic mean (midnight to midnight).
- CO: 4-hour block arithmetic mean beginning at midnight.
- Opacity: 6 minute arithmetic mean.

Abbreviations

- ug/dscm: Micrograms per dry standard cubic meter
- mg/dscm: Milligrams per dry standard cubic meter
- ng/dscm: Nanograms per dry standard cubic meter
- ppmdv: Part per million dry volume
- Dioxins/ furans: Total tetra through octa-chlorinated dibenzo-p-dioxins and dibenzofurans
- F: Fluorides as hydrogen fluoride

Project: Facility Improvements
 Facility ID No. 0570127
 SIC: 4953

City of Tampa
 McKay Bay Refuse-to-Energy Facility
 Tampa, Florida

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

Auxiliary Burners: Nitrogen oxides emission from the auxiliary burners are expected to be approximately 2.4 lb/hr and 10.5 ton/yr, per unit. These emissions are included in, and not in addition to, combustor emissions, as limited above. Allowable emissions for MSW combustors include emissions from auxiliary burners. The gross heat input from natural gas combustion in the auxiliary burners shall not exceed 10 percent of the total potential heat input in any calendar year. Auxiliary burners for each MWC unit shall be fired only with natural gas, and the annual capacity factor for natural gas is 10% or less; see 40 CFR 60.44b(d). See condition B.9 of this permit.

[40 CFR 60.44b, Rules 62-210.200, 62-204.800 (8) and 62-4.070(3), F.A.C., and request of applicant]

B.9 Auxiliary Burners: Auxiliary burners for each unit shall be fired only with natural gas. The annual capacity factor for natural gas for each unit shall be limited to 10% or less. The annual capacity factor for natural gas is the ratio between the heat input to the unit from natural gas during a calendar year and the potential heat input to the unit had it been operated for 8,760 hours during a calendar year at the maximum steady state design heat input capacity. Monthly records shall be maintained of the amount of natural gas used by the auxiliary burners of each unit and the equivalent heat input from natural gas. On an annual basis (no later than 30 days after the end of the calendar year), a demonstration must be performed based on the monthly records showing that the capacity factor for natural gas for each unit was 10% or less.

[Rule 62-4.070(3), F.A.C., 40 CFR 60.41b and 40 CFR 60.44b(d)]

{Note: This condition effectively limits annual average heat input from natural gas to approximately 12 mmBtu/hr per unit.}

COMPLIANCE AND PERFORMANCE TESTING

B.10 Stack Testing

Compliance with the emission limits for carbon monoxide (CO), nitrogen oxides (NO_x), and sulfur dioxide (SO₂) in specific condition B.8 of this permit shall be demonstrated by continuous emission monitoring systems (CEMS) as required by specific condition B.13.

Compliance tests for the other pollutants listed in specific condition B.8 shall be performed annually by using the following reference methods as described in 40 CFR 60, Appendix A and/or 40 CFR 61 Appendix B adopted by reference in Chapter 62-204, F.A.C. or any other method as approved by FDEP, in accordance with Chapter 62-297, F.A.C. Stack tests may also require Method 1, 2, 3/3A/3B and 4 tests as appropriate. Testing shall be conducted in accordance with the requirements of 40 CFR 60.58b Compliance and Performance Testing. Emission determinations based on stack tests are to be the average of three valid test runs pursuant to Rule 62-297.310(1), F.A.C. A test protocol shall be

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

submitted for approval to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) at least 45 days prior to the initial testing. [Rule 62-204.800(8), F.A.C. and Chapter 62-297, F.A.C.]

- Method 5** ⁽¹⁾ Determination of Particulate Matter Emissions from Stationary Sources.
Method 9 Visual Determination of the Opacity of Emissions from Stationary Sources.
- Method 13A** ⁽⁴⁾ Determination of Total Fluoride Emission from Stationary Sources.
or 13B
- Method 23** ⁽²⁾ Determination of Dioxin/furan Concentration from Stationary Sources.
Method 26 ⁽³⁾ Determination of HCl emissions.
or 26A
- Method 29** ^{(3) (4)} Determination of Metals Emissions from Stationary Sources.

- (1) Pursuant to 40 CFR 60.58b(c)(3) EPA Reference Method 5 shall be used for determining compliance with the particulate matter emission limit. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than 160 ± 14 °C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run.
- (2) Dioxin/Furan emission limit expressed as the total mass of tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans. The facility may perform less frequent testing for dioxin/furan emissions, as allowed by 40 CFR 60.38b(b) with prior notice to the Department, if the facility's dioxin/furan emissions do not exceed 15 ng/dscm corrected to 7% O₂ or less for all MWC units.
- (3) Mercury and HCl stack tests upstream and downstream of the control device(s) shall be conducted to calculate percent control.
- (4) Testing for compliance with the fluoride and beryllium emission limits shall be demonstrated during the initial compliance test and every five years thereafter.

Initial compliance tests for each combustion unit shall be conducted within 60 days after achieving maximum operating capacity, but no later than 180 days after startup. Annual tests shall be conducted within one year after the initial tests, unless otherwise allowed by the Department.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

Unit load levels (steam flow) and particulate control device inlet temperatures may be varied for purposes of testing in accordance with 40 CFR 60.53b(b)&(c). See also specific conditions B.3, B.14, B.16 and D.7 of this permit.

- B.11. Test Procedures: Compliance tests shall meet all applicable requirements (i.e., testing frequency, minimum compliance duration, etc.) of Chapter 62-297, F.A.C. The Method 9 test shall be conducted during one run of the particulate matter test. The particulate matter test shall be conducted under conditions representative of normal operations and shall be scheduled to coincide with as much of the normal cleaning (sootblowing) cycle as practicable. Initial performance tests for SO₂ and NO_x shall be conducted using CEMS in accordance with the methods and requirements of 40 CFR 60.58b(e)(4) and (h)(3), respectively. [Rules 62-4.070(3), 62-297.310 and 62-204.800(8), F.A.C.; 40 CFR 60.38b and 40 CFR 60.58b]
- B.12. Stack Testing Facilities: The owner or operator shall install stack testing facilities in accordance with Rule 62-297.310(6), F.A.C. The owner or operator shall provide ports in the air pollution control equipment outlet duct or stack and shall provide access to the sampling ports. [Rule 62-297.310(6)(c), F.A.C.]

MONITORING OF OPERATIONS

- B.13. Continuous Monitoring: Compliance with the emission limits for carbon monoxide (CO), nitrogen oxides (NO_x), and sulfur dioxide (SO₂) in specific condition B.8 of this permit shall be demonstrated by continuous emission monitoring systems (CEMS) operated in accordance with the requirements of 40 CFR 60.58b. Oxygen (O₂), and opacity shall be monitored by continuous monitoring systems. Monitors for sulfur dioxide and oxygen shall be located both upstream of the dry scrubber and downstream of the baghouse in order to calculate percentage removal efficiency. Continuous monitoring systems shall be installed, calibrated, maintained and operated as required by 40 CFR 60.13 and shall conform to all applicable Performance Specifications in 40 CFR 60, Appendix B. Quality assurance procedures shall conform to all applicable sections of 40 CFR 60, Appendix F. Initial performance evaluations shall be completed within 180 days after initial startup of each retrofitted unit. Data on continuous monitor equipment specifications, manufacturer, type, calibration and maintenance needs, and proposed locations shall be provided to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) for review at least 90 days prior to installation. [Rules 62-4.070(3) and 62-204.800(8), F.A.C.; 40 CFR 60.38 and 40 CFR 60.58b]
- B.14. Continuous Load Monitoring: The owner or operator shall install, calibrate, maintain, and operate a steam flow meter, measure steam flow in kilograms (or pounds) per hour on a

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

continuous basis, and record the output of the monitor (in accordance with the ASME method described in 40 CFR 60.58b(i)(6)). Steam flow shall be calculated in 4-hour block arithmetic averages. Higher loads are allowed for testing purposes pursuant to 40 CFR 60.53b(b).

[Rule 62-204.800(8), F.A.C., 40 CFR 60.31b; 60.38b; 60.51b; 60.53b(b); and 60.58b(i)(6)]

B.15 Charging Rate Monitoring: The average daily solid waste charging rate shall be determined on a monthly basis and recorded for each MWC unit. The daily charging rate shall be determined each month on an average daily basis for each MWC unit using the Facility's truck scale weight data, refuse pit inventory data and MWC operating data for the preceding calendar month. Monthly truck scale weight records of the weight of solid waste received and processed at the Facility, and refuse pit inventory data, shall be used to determine the amount of solid waste charged during the preceding calendar month on an average daily basis. The MWC load level measurements or other operating data shall be used to determine the number of operating hours per MWC unit for each day during the preceding calendar month.

[Rules 62-204.800(8) and 62-4.070(3), F.A.C., and 40 CFR 60.53(a)]

B.16 Compliance with the PM Control Device Temperature: Each MWC unit is required to continuously monitor and record the flue gas temperature at the inlet to the PM control device in accordance with the requirements at 40 CFR 60.58b(i)(7). The PM control device temperature shall be calculated in 4-hour block arithmetic averages. Each MWC unit shall be allowed to operate up to 17°C (30° F) above the unit's maximum demonstrated PM control device temperature. The maximum demonstrated PM control device temperature is the highest 4-hour arithmetic measurement of temperature at the inlet to the PM control device recorded for 4 consecutive hours during the most recent dioxin/furan performance test which complied with the limits given above. The PM control device inlet temperature and the steam flow for each unit during the stack test shall be continuously monitored and recorded in accordance with 40 CFR 60, Subpart Cb.

Higher temperatures are allowed for testing purposes, as specified at 40 CFR 60.53b(c).
[Rule 62-204.800(8), F.A.C. and 40 CFR 60.38b, 40 CFR 60.53b(c) and 60.58b(i)(7) and (9)]

B.17 Carbon Injection Rate: The carbon injection rate for each MWC unit in kilograms (or pounds) per hour shall be estimated during each mercury and dioxin/furan compliance stack test based on carbon injection system operating parameters such as the screw feeder speed, hopper volume, hopper refill frequency, or other parameters appropriate to the feed system being employed. During operation of each MWC unit, the carbon injection system

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

operating parameter(s) that are the primary indicator(s) of carbon mass feed rate must equal or exceed the level(s) documented during the most recent mercury and dioxin/furan stack tests in which compliance with the emission limits were achieved. The owner or operator shall estimate the total carbon usage for the facility for each calendar quarter by the following two independent methods: (1) the weight of carbon delivered to the facility, and (2) estimate the average carbon mass feed rate (kg/hr or lb/hr) for each hour of operation for each MWC unit based on the primary indicator(s) for carbon mass feed rate, and sum the results for all MWC units for the total number of operating hours of operation during the calendar quarter.

[Rule 62-204.800(8), F.A.C. and 40 CFR 60.58b(m)]

- B.18 Continuous Monitors: Continuous monitors with recorders shall be installed, calibrated, maintained and operated for each unit subject to review by the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) for the following operational parameters:

Total steam production (mass/hr, pressure and temperature)

Carbon injection system operating parameters

Particulate matter control device inlet temperature

Power generation (MW) (total power production from the single turbine generator)

[Rule 62-204.800(8), F.A.C. and 40 CFR 60.58b]

RECORD KEEPING AND REPORTING REQUIREMENTS

- B.19 Reports and Records:

All measurements, records and other data (test reports, etc.) required to be maintained by this facility shall be retained for at least five (5) years following the date on which such measurements, records and other data are recorded. Such records shall be maintained at the facility and shall include but not be limited to the items listed below. These records shall be made available upon request to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) for inspection at the facility. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C., 40 CFR 60.5b and 40 CFR 60.44b(d)]

- (a) Data collected from monitoring instruments, including continuous monitoring systems, steam flow measurements and PM control device temperatures;
- (b) Continuous steam flow records on a 4-hour block average basis;

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- (c) Records of daily solid waste charging rates and hours of operation derived from monthly truck scale data, refuse pit inventory, and operational records;
- (d) Amount of natural gas burned for each unit each month; the equivalent heat input from natural gas for each unit each month, calculated using the heat value for natural gas provided by the natural gas supplier; and the annual records of the natural gas capacity factor for each unit;
- (e) Results of all source tests or performance tests; and records of the maximum demonstrated unit load specified by condition B.3 of this permit.
- (f) Amounts of activated carbon used for emissions control;
- (g) Calibration logs for all instruments subject to this permit;
- (h) Maintenance/repair logs for any work performed which is subject to this permit;
- (i) Records showing the names of facility personnel who have been provisionally or fully certified, and who have completed the MWC operator training course, and who have completed reviews of the operating manual, including the dates and documentation of certification/review.
- (j) Records demonstrating compliance with the percentage limitations on segregated solid wastes required by specific condition B.24 of this permit.

B.20 Excess Emission Reports:

B.20.1 Quarterly Reports:

The owner or operator shall submit excess emission reports for any calendar quarter during which there are excess emissions from the facility pursuant to 40 CFR 60.7(c). If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report quarterly stating that no excess emissions occurred during the quarterly reporting period. The report shall include the following:

- (a) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each period of excess emissions. [40 CFR 60.7(c)(1)]
- (b) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measures adopted. [40 CFR 60.7(c)(2)]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- (c) The date and time identifying each period during which the continuous monitoring system (CEM/COM) was inoperative except for zero and span checks, and the nature of the system repairs or adjustments. [40 CFR 60.7(d)(2) as applicable]
- (d) When no excess emissions have occurred or the continuous monitoring system (CEM/COM) has not been inoperative, repaired, or adjusted, such information shall be stated in the report. [40 CFR 60.7(c)(4)]

B.20.2 Other Excess Emission Reports:

In case of excess emissions resulting from malfunctions*, the owner or operator shall notify Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) in accordance with Section 62-4.130, F.A.C. The DEPSWD and the HCEPC shall be notified within one working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the DEPSWD or the HCEPC may request a written summary report of the incident. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the DEPSWD or HCEPC.

* Malfunction is defined at Rule 62-210.200(179) to mean any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

[Rules 62-4.130 and 62-210.700(6), F.A.C.]

- B.21 Continuous Emission Monitoring System Reports: For CEM and other monitoring systems required by this permit, data on monitoring equipment specifications, manufacturer, type, calibration and maintenance needs, and proposed sampling location shall be provided to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) for review at least 90 days prior to installation.
- B.22 Operating Reports: Before March 1st of each year, the owner or operator shall submit to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) the Annual Operating Report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

No later than February 1st of each year, the owner or operator shall submit an annual report for the previous calendar year including the information required by 40 CFR 60.59b(g)(1) through (4), as applicable.

In addition, if applicable, the owner or operator shall submit to the DEPSWD and the HCEPC offices the information required in 40 CFR 60.59b(h) on a semiannual basis.
[Rule 62-210.370(3), F.A.C. and 40 CFR 60.59(g) and if applicable 40 CFR 60.59b(h)]

B.23 Sampling Reports: Drawings of testing facilities including sampling port locations as required by Section 62-297.310(8)(c) shall be submitted to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) for review at least 60 days prior to construction of the sampling ports.

B.24 Segregated Solid Waste Record Keeping: The following records shall be made and kept to demonstrate compliance with the segregated non-MSW percentage limitations of specific condition B.6.6 and B.6.7:

Each segregated load of non-MSW materials, that is subject to the percentage weight limitations of specific condition B.6.6 and B.6.7, which is received for processing shall be documented as to waste description and weight. The weight of all waste materials received for processing shall be measured using the facility truck scale and recorded.

Each day the total weight of segregated tires received shall be computed, and the daily total shall be added to the sum of the daily totals from the previous 29 days. The resultant 30 day total weight of tires shall be divided by the total weight of all waste materials received in the same 30 day period, and the resultant number shall be multiplied by 100 to express the ratio in percentage terms. The percentage computed shall be compared to the 3% limitation.

Each day the total weight of segregated non-MSW materials received that are subject to the 5% restriction shall be computed, and the daily total shall be added to the sum of the daily totals from the previous 29 days. The resultant 30 day total weight of segregated non-MSW materials shall be divided by the total weight of all waste materials received in the same 30 day period, and the resultant number shall be multiplied by 100 to express the ratio in percentage terms. The percentage computed shall be compared to the 5% limitation.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- B.25 Heat Input Reporting Requirements. The owner or operator shall submit to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) notification of the date of initial startup as provided by 40 CFR 60.7. Such notification shall include the design heat input capacity of the affected facility, and the annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each fuel fired. (The two fuels fired at this facility are solid wastes allowed by this permit and natural gas.) [40 CFR 60.49b(a)(1) & (3)]
- B.26 Report of Vendor and Equipment Selection. Within 60 days of selection of a primary vendor for this project, a report detailing the design features of the MWC equipment to be installed shall be submitted to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC). Such report shall include the nominal and maximum design capacities of the furnaces, grates and boilers, and shall detail operating rates such as heat input, steam production, mass throughput and turndown capability for each unit. [Rule 62-4.070(3), F.A.C.]

OPERATOR TRAINING AND CERTIFICATION

- B.27 Requirements
- (a) One of the following persons must be on duty at the facility at any time during which one or more of the MWC units is operating: a fully certified chief facility operator or shift supervisor; or a provisionally certified chief facility operator or shift supervisor who is scheduled to take the full certification exam. If this person must leave the facility during his or her operating shift, a provisionally certified control room operator who is on site may fulfill this requirement. [40 CFR 60.39b(c)(4) (ii) and 40 CFR 60.54b(c)]
 - (b) Each chief facility operator and shift supervisor must obtain and maintain a current provisional operator certification and be scheduled for a full certification exam, or receive full certification, with either the ASME or an equivalent state-approved certification program before the date that person assumes responsibility for operation of the facility. [40 CFR 60.39b(c)(4)(ii) and 40 CFR 60.54b(a) and (b)]
 - (c) Each chief facility operator, shift supervisor, and control room operator must complete the EPA or state approved MWC operator training course before the date that person assumes responsibility for operation of the facility. The operator training course

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

requirements of 40 CFR 60.54b(d) do not apply to chief facility operators, shift supervisors and control room operators who have obtained full ASME certification on or before the date of State plan approval (November 13, 1997). [40 CFR 60.39b(c)(4)(iii)(A).] The owner or operator may request that the Department waive the operator training course requirements specified in 40 CFR 60.54b(d) for chief facility operators, shift supervisors and control room operators who have obtained provisional ASME certification on or before the date of State plan approval (November 13, 1997) [40 CFR 60.39b(c)(4)(iii)(B)]. [40 CFR 60.39b(c)(4) and 40 CFR 60.54b(d)]

- (d) A site-specific operating manual must be developed and updated on an annual basis [40 CFR 60.54b(e)]. A training program must be established to review the operating manual with each person who has responsibilities affecting the operation of the MWC including chief facility operators, shift supervisors, control room operators, ash handlers, maintenance personnel, and crane/load handlers. Each person must undergo initial training before the day that person assumes responsibilities affecting operation of the facility and annually thereafter pursuant to 40 CFR 60.54b(f). The operating manual must be kept in a readily accessible location for all persons required to undergo training. [40 CFR 60.35b and 40 CFR 60.54b(e) & (f)]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION C. SPECIFIC CONDITIONS:

The following specific conditions apply to the following emissions units after improvements to comply with 40 CFR 60 Subpart Cb are completed.

EMISSIONS UNIT NO.	EMISSIONS UNITS DESCRIPTION
006	Ash Building and Handling System
007	Lime Silo
008	Carbon Silo

EMISSION LIMITATIONS

C.1 Lime & Carbon Silos and Ash Handling System:

Particulate emissions from these emissions units shall be limited as follows:

- (a) In no case shall PM emissions from the lime storage silo exhaust exceed 0.015 gr/dscf during filling operations of the lime storage silo. Visible emissions shall not exceed 5% opacity in accordance with specific condition C.3.
- (b) In no case shall particulate matter emissions from the activated carbon storage silo exhaust exceed 0.015 gr/dscf during filling operations of the activated carbon storage silo. Visible emissions shall not exceed 5% opacity in accordance with specific condition C.3.
- (c) Visible emissions from the ash conveyor systems, transfer points, buildings, or enclosures of ash conveying systems shall not occur more than 5 percent of the time during the observation period, except during times of maintenance or repair of these systems.
- (d) The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. The ash handling facilities shall be enclosed. Residue from the grates, grate siftings, and ash from the combustor/boiler and fabric filter hoppers during normal operations shall be discharged into the ash quenching system, or otherwise handled in a manner to minimize visible dust. The ash/residue in the ash handling building shall remain sufficiently moist to prevent dust during storage and handling operations.

[Rule 62-4.070(3), F.A.C., 40 CFR 60.36b and 40 CFR 60.55b]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

{Note: The fugitive particulate matter control requirements for the ash handling activities specified in 40 CFR 60.55b and in this permit represent RACT for this facility pursuant to the Department's authority of Rule 62-296.711(2)(c), F.A.C.}

COMPLIANCE AND PERFORMANCE TESTING

C.2 Fugitives Emissions Compliance: The compliance method for the ash handling facilities, including the ash handling building vent, shall be EPA Method 22, Visual Determination of Fugitives Emissions From Material Sources.

(a) The minimum observation time will be three hours, and will include periods when ash is being transferred from the MWC unit to the storage area, and when ash is being loaded for disposal.

(b) Compliance testing for the Ash Handling Building vent and ash conveyor system shall be conducted within 180 days of completion of construction and initial operation and annually thereafter.

Permanent stack testing facilities are not required for the ash handling building vent. [Rule 62-4.070(3), F.A.C., 40 CFR 60.36b and 40 CFR 60.55b]

C.3. Carbon and Lime Storage Silos PM Compliance Requirements: The PM compliance test requirements are waived for the lime and carbon storage silos and an alternate standard of 5 percent opacity shall apply. Compliance testing for the lime and carbon silos shall be conducted within 180 days of completion of construction and initial operation and annually thereafter. The visible emission tests shall be performed for each silo during filling operations using EPA Method 9. A visible emission reading greater than 5 percent opacity does not create a presumption that the emission limit (in gr/dscf) is being violated, but may require the owner or operator to perform a particulate stack test. Permanent stack testing facilities are not required for the lime and carbon silos. The owner or operator may install temporary stack sampling facilities to conduct such a test, if required. [Rule 62-297.620(4), F.A.C.]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

SUBSECTION D. COMMON CONDITIONS:

The following specific conditions apply to the following emissions units after improvements to comply with 40 CFR 60 Subpart Cb are completed.

EMISSIONS UNIT No.	EMISSIONS UNITS DESCRIPTION
001	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 1
002	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 2
003	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 3
004	120 mmBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners - Unit No. 4
006	Ash Building and Handling System
007	Lime Silo
008	Carbon Silo

OPERATIONAL REQUIREMENTS

- D.1 These emissions units are allowed to operate continuously (8760 hours/year).
[Rule 62-210.200, F.A.C. Definitions-Potential to emit (PTE)]
- D.2 Odor Control: No objectionable odors are allowed from this facility. The truck access doors to the facility shall remain closed except during normal working shifts when MSW is being received at the storage pit area. To minimize odors at the facility, a negative pressure shall be maintained on the tipping floor and air from within the building will be used as combustion air. [Rule 62-296.320(2), F.A.C.]
- D.3 Startup/Shutdown/Malfunctions
 - (a) In order to minimize excess emissions during startup/shutdown/malfunction these emissions units shall adhere to best operational practices to minimize emissions.

The duration of excess emissions from the lime silo or the carbon silo shall be minimized but in no case exceed 2 hours per occurrence
[Rule 62-210.700, F.A.C.]
 - (b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- (c) Within 90 days prior to completion of construction of the first two units of this facility, the owner or operator shall submit to the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) an operational procedures manual that identifies and describes best operational practices that will be used during startup, shutdown, and malfunctions of this facility.

EMISSION LIMITATIONS

- D.4 Facility Fugitive (Unconfined) Emissions: Fugitive emissions at this facility shall be adequately controlled at all times. All roads shall be adequately paved, and vacuum swept if appropriate, to minimize accumulations of ash and dust. Speed limit signs shall be posted. Unprocessed refuse storage areas which must be open for operational purposes (e.g., tipping floor or the refuse bunker while trucks are entering and leaving) shall be under negative air pressure.
[Rule 62-296.320(4)(c), F.A.C.]

COMPLIANCE AND PERFORMANCE TESTING

- D.5 Test Notification: The owner or operator shall notify the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) in writing at least *30 days* (for the initial test) and *15 days* (for the annual tests) prior to each scheduled compliance test to allow witnessing. The notification shall include the compliance test date, place of such test, the expected test time, the facility contact person for the test, and the person or company conducting the test. The 30 or 15 day notification requirement may be waived at the discretion of the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC). Likewise, if circumstances prevent testing during the test window specified for the emissions unit, the owner or operator may request an alternate test date before the expiration of this window. [Rule 62-297.310 and 40 CFR 60.8, F.A.C.]
- D.6 Special Compliance Tests: When the Department, after investigation, has good reason (such as substantiated complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the Department's

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC).

[Rule 62-297.310(7)(b), F.A.C.]

- D.7 Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit in operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. See also specific conditions B.2 and B.3 of this permit for limitations related to unit load for the MWC units. Higher loads are allowed for testing purposes as specified at 40 CFR 60.53b(b) and condition B.3 of this permit.
[Rule 62-297.310(2) and (2)(b), F.A.C., and 40 CFR 53b(b)]

RECORD KEEPING AND REPORTING REQUIREMENTS

- D.8 Emission Compliance Stack Test Reports:

[Rule 62-297.310(8), F.A.C., and 40 CFR 60.59(b)(f)]

- (a) A *test report* indicating the results of the required compliance tests shall be filed with the Department's Southwest District office (DEPSWD) and the Hillsborough County Environmental Protection Commission (HCEPC) as soon as practical, but no later than 45 days after the last sampling run is completed.
- (b) The *test report* shall provide sufficient detail on the tested emissions unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in Rule 62-297.310(8), F.A.C.

SCHEDULE OF COMPLIANCE

- D.9 The compliance schedule for each unit is provided below. Activities related to this project shall follow the compliance schedule.

Increment 1: Submittal of a final control plan for the designated facility to the appropriate air pollution control agency. November 13, 1998, applicable to all units.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

- Increment 2: Awarding of contracts for emission control systems or for process modifications, or issuance of orders for the purchase of component parts to accomplish emission control or process modification. July 13, 1999, applicable to all units.
- Increment 3: Initiation of on-site construction or installation of emission control equipment or process change. November 13, 1999, applicable to all units.
- Increment 4: Completion of on-site construction or installation of emission control equipment or process change. November 13, 2000, applicable to the first and second units. November 13, 2001, applicable to the third and fourth units. The order of the construction schedule (i.e. which units are the first and second, and third and fourth) will be identified in the final control plan.
- Increment 5: Final compliance. May 13, 2002, applicable to the first and second units. May 13, 2003 applicable to the third and fourth units. The order of final compliance (i.e. which units are the first and second, and third and fourth) will be identified in the final control plan.

Closure Agreement: No later than November 13, 2000, the City will cease operation of any unit that has not completed on-site construction or installation of emission control equipment and is not involved in performance testing. After closure, said units may commence startup, shakedown and performance/compliance testing per the closure agreement. Performance/compliance tests must be completed within 180 days of startup. [Rule 62-204.800(8)9.b., F.A.C.]

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

- G.1 The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- G.2 This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings or exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- G.3 As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- G.4 This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- G.5 This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- G.6 The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- G.7 The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
- (a) Have access to and copy and records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.
- Reasonable time may depend on the nature of the concern being investigated.
- G.8 If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
- (a) A description of and cause of non-compliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

APPENDIX GC
GENERAL PERMIT CONDITIONS [F.A.C. 62-4.160]

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- G.9 In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- G.10 The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- G.11 This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- G.12 This permit or a copy thereof shall be kept at the work site of the permitted activity.
- G.13 This permit also constitutes:
- (a) Determination of Best Available Control Technology ()
 - (b) Determination of Prevention of Significant Deterioration (); and
 - (c) Compliance with New Source Performance Standards ().
- G.14 The permittee shall comply with the following: -
- (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The person responsible for performing the sampling or measurements;
 - 3. The dates analyses were performed;
 - 4. The person responsible for performing the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.
- G.15 When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Memorandum

Florida Department of Environmental Protection

TO: Howard L. Rhodes

THRU: Clair Fancy *ajf 3/31*
Al Linero *AL*

FROM: Joseph Kahn

DATE: March 31, 1998

SUBJECT: Tampa McKay Bay Facility Improvements, 0570127-002-AC, PSD-FL-086(A)

Attached for approval and signature is construction permit number 0570127-002-AC / PSD-FL-086(A) for facility improvements to the City of Tampa's McKay Bay Refuse-to-Energy Facility to comply with the emission guidelines of 40 CFR 60 Subpart Cb. This construction permit (PSD permit revision) will allow the City of Tampa to: replace and improve the air pollution control system; add natural gas auxiliary burners for improved combustion control; define process throughput parameters; increase amount of waste that can be burned on a short-term basis, and specify which materials can be burned at its solid waste energy recovery facility located at 107 North 34th Street, Tampa, Hillsborough County, Florida.

A review for the Prevention of Significant Deterioration (PSD) and Best Available Control Technology determination were not required, as potential emissions will not significantly increase as a result of this project. Because of the extensive nature of physical changes allowed by this permit, and the extensive changes in the emission limits and monitoring requirements, it was issued as a revised PSD permit.

Verbal and written comments were received from the applicant's consultants and attorneys and minor changes were made to the permit as described in the final determination. No other comments were received.

I recommend your approval and signature.

Attachments

/jfk

LANDERS & PARSONS, P.A.
ATTORNEYS AT LAW

CINDY L. BARTIN
DAVID S. DEE
JOSEPH W. LANDERS, JR.
JOHN T. LAVIA, III
FRED A. McCORMACK
PHILIP S. PARSONS
ROBERT SCHEFFEL WRIGHT

HOWELL L. FERGUSON
OF COUNSEL

VICTORIA J. TSCHINKEL
SENIOR CONSULTANT
(NOT A MEMBER OF THE FLORIDA BAR)

310 WEST COLLEGE AVENUE
POST OFFICE BOX 271
TALLAHASSEE, FLORIDA 32302
TELEPHONE (850) 681-0311
TELECOPY (850) 224-5595
www.landersondparsons.com

RECEIVED
FEB 26 1998
BUREAU OF
AIR REGULATION

February 26, 1998

Hand Deliver

Mr. Al Linero
Department of Environmental Protection
111 South Magnolia Drive
Tallahassee, Florida

Re: McKay Bay Refuse-to-Energy Facility Improvements
Project; Draft Permit No. 05720127-002-AV; PSD-FL-086 (A)

Dear Mr. Linero:

Enclosed for your files is proof of publication of the "DEP Notice of Intent to Issue Permit Modifications" with regard to the above referenced project.

If you have any questions, please call.

Sincerely,

Vickie Cantley

Vickie Cantley
Secretary to David S. Dee

CC: EPA
NPS
Hillsboro Co
SWD

THE TAMPA TRIBUNE
Published Daily
Tampa, Hillsborough County, Florida

State of Florida)
County of Hillsborough) ss.

Before the undersigned authority personally appeared J. Rosenthal, who on oath says that she is Classified Billing Manager of The Tampa Tribune, a daily newspaper published at Tampa in Hillsborough County, Florida; that the attached copy of advertisement being a

LEGAL NOTICE

in the matter of _____

PUBLIC NOTICE OF INTENT

was published in said newspaper in the issues of _____

FEBRUARY 18, 1998

Affiant further says that the said The Tampa Tribune is a newspaper published at Tampa in said Hillsborough County, Florida, and that the said newspaper has heretofore been continuously published in said Hillsborough County, Florida, each day and has been entered as second class mail matter at the post office in Tampa, in said Hillsborough County, Florida for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, this advertisement for publication in the said newspaper.

J. Rosenthal
25

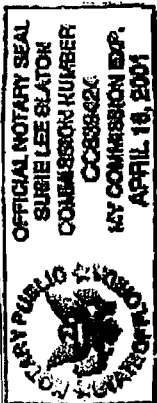
Sworn to and subscribed before me, this _____ day
of FEBRUARY, A.D. 19⁹⁸

Personally Known _____ or Product Identification _____
Type of Identification Produced _____

(SEAL)

Shirley Lee Glaton

TOTAL P.02



Day, February 18, 1998

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ackages (or three days before the bid ending with the bid.)

BID BOND

Guaranty of not less than five percent (5%) of the bid in the form of a certified check, check, trust company check, bank draft, or state bank check. Bid bond made by the Department of Transportation must accompany a bid in excess of \$100,000. A check or draft must be made payable to the order of DOT (01/96) as with the proposal.

PERFORMANCE AND PAYMENT BOND

Contract and Payment bond for the contract shall be maintained throughout the life of the contract.

REACTIVE ACTION

of Florida Department of Transportation in accordance with the provisions of the Civil Rights Act (78 Stat. 252) and provisions of the Department's Memorandum (15 CFR, 480) and the proposal by which it will affirmatively in any contract to ensure that minority enterprises will be given full opportunity to respond to this bid and that they will not be discriminated against on the basis of race, religion, or national origin for an Equalized Contractor Requirement.

or must be Prequalified in accordance with Rulo 4-22 on the date of the bid to submit a bid of \$250,000 or more on a project. Any bid of \$250,000 submitted in accordance with Section 120.53(5), Florida Statutes, shall be rejected. All Pre-qualified Contractors that submit bids must provide Certificates of Current Capacity (020-22a) and Status of Bond (Form 020-22b) on the day of the bid.

PRE-BID MEETINGS

Mandatory Pre-bid meetings will be held at the time of the bid, in order to be in compliance with the Department's Pre-bid meeting procedures. Any contractor who fails to attend the pre-bid meeting will be ineligible to bid. The Department will not be responsible for the cost of travel to the pre-bid meeting.

BURR/PINELLAS (BRRP) FUNDS FY 1997-98 (WPN) CN E-7735

Work on Preventive Maintenance on the Skyway using Spot Painting Span Cable Stayed Pinna Expansion Bearing Systems in Joints. Various Joint Repairs on Damaged Duct PVC Columns and Main Span Segments, Clean-

Legals

ing and Sealing Cracks in the High Level Approach and Main Span Columns and Superstructure, Dewatering of the Low Level Approach Columns, Some Materials Testing, Upgrading of the Lighting Protection System, Electrical Modifications, and Other Miscellaneous Work. (Approx. 168 Cal. Days). (Approx. Budget \$1,100,000.00). Plans have been prepared for this project. There is a charge of \$40.00 for plans and specifications). NOTE: Only Prequalified Contractors may bid this project. Also see paragraph regarding 'Prequalified Contractor Requirements' in this Advertisement. Note: There Will Be a Mandatory Pre-Bid Meeting Held at the Florida Department of Transportation, 11201 N. McKinley Dr., Tampa, Florida 33612 in Conference Room B-1 on March 2, 1998 at 10:00 A.M. See paragraph regarding 'Mandatory Pre-Bid Meetings' in this Advertisement.

HILLSBOROUGH COUNTY (D FUNDS) FY 98/99) SPN 10002-9132: WPN 7630391: DCN E-7738

Work Consists of Mowing along the Cross-town Expressway. Approx. 365 Cal. Days). (Approx. Budget \$151,000.00). No plans have been prepared for this project. Note: There Will Be a Mandatory Pre-bid Meeting Held at the Florida Department of Transportation, 11201 N. McKinley Dr., Tampa, Florida 33612 in Conference Room B-1 on March 3, 1998 at 2:00 P.M. See paragraph regarding 'Mandatory Pre-Bid Meetings' in this Advertisement.

PINELLAS COUNTY (D FUNDS) FY 97/98) SPN 15946-9284: WPN 7612371: DCN E-7740

Work Consists of Mowing, Litter Removal, Edging and Sweeping at Various Locations in Pinellas County. (Approx. 365 Cal. Days). (Approx. Budget \$191,000.00). No plans have been prepared for this project. No Pre-Bid Meeting has been scheduled for this project.

BID SOLICITATION PROTESTS

Pursuant to DOT Rule 14-25 and Section 337.11, Florida Statutes, any persons who feel they are adversely affected by a bid solicitation shall file both a notice of protest and bond within 72 hours of the receipt of the bid documents and shall file a formal written protest within ten days after filing the notice of protest. The formal written protest shall state with particularity the facts and law upon which the protest is based. Any persons who file a notice of protest as to a bid solicitation pursuant to this rule shall post with the Department, at the time of filing the notice of protest, a bond payable to the Department in the following amounts: For an action protesting a bid solicitation for which bidders must be pre-qualified by the Department to be eligible to bid, the bond shall be \$5,000; for an action protesting a bid solicitation for which bidders are not required to be pre-qualified by the Department to be eligible to bid, the bond shall be \$2,500. The required notice of protest, bond, and formal written protest must each be timely filed with the Clerk of Agency Proceedings, Florida Department of Transportation, Mail Station 5A, Room 562, 605 Suwannee Street, Tallahassee, Florida 32399-0458. All protests must be submitted in accordance with Section 337.11, Florida Statutes and DOT Rule 14-25. Failure to file a protest within the time prescribed in Section 120.53(5), Florida Statutes, shall constitute a waiver of proceedings under Chapter 120, Florida Statutes. A protest is not timely filed unless the notice of protest, bond, and the formal written protests are each received by the Clerk of Agency Proceedings within the required time limits.

EXECUTION OF CONTRACT

The successful bidder shall execute the necessary contract documents and return the agreement along with a satisfactory Performance and Payment Bond within twenty (20) calendar days of award.

MINIMUM WAGE

Wage Rate: Pursuant to the Fair Labor Standards Act, the Minimum Wage Rates of the project(s) included in this Notice shall be \$3.15 per hour.

RIGHT TO REJECT ANY OR ALL BIDS

The right is reserved to reject any or all bids.

CORRECTIONS

All prospective bidders are urged to always read the second (subsequent) newspaper advertisement as any error noted in the first (original) newspaper advertisement will be corrected in the second printing.

FIRST-TIME BIDDERS ORIENTATION MEETING

The Department is offering first-time bidders the opportunity to attend an orientation meeting. Please call (813) 975-6036 or (800) 226-7220 for further details.

John D. Ellis
District Contracts
Administrator

1227 2/18, 25/98

Legals

BID POSTING

Unless bidders are notified by certified mail or express delivery, return receipt, the Summary of Bids for these projects will be posted at 2:30 P.M. (Local Time) in the Front Lobby of the District Seven Headquarters, Florida Department of Transportation, 11201 North McKinley Drive, Tallahassee, Florida 32399-0458, both a notice of protest and bond within 72 hours after posting the Summary of Bids. If notice of intended decision is given by certified mail or express delivery, the adversely affected person must file both the notice of protest and bond within 72 hours after receipt of the notice of intent to award. At the time of filing the notice of protest, a bond payable to the Department in the following amounts: For an action protesting a bid rejection or contract award that requires qualification of bidders, the bond shall be equal to one percent of the lowest bid submitted or \$5,000, whichever is greater; For an action protesting a bid rejection or an award that does not require qualification of the bidders, the bond should be \$2,500. Additionally, a formal written protest must be filed within ten days after filing the notice of protest. The formal written protest shall state with particularity the facts and law upon which the protest is based. All protests must be submitted in accordance with Section 337.11, Florida Statutes and DOT Rule 14-25. Failure to file a protest within the time prescribed in Section 120.53(5), Florida Statutes, shall constitute a waiver of proceedings under Chapter 120, Florida Statutes. A protest is not timely filed unless the notice of protest, bond, and the formal written protests are each received by the Clerk of Agency Proceedings within the required time limits.

An award protest which is filed prematurely will be deemed abandoned unless timely renewed.

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John D. Ellis
District Contracts
Administrator

1227 2/18, 25/98

Legals

PUBLIC NOTICE OF INTENT TO ISSUE PERMIT MODIFICATION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DRAFT Permit No. PSD-FL-086 (A)
City of Tampa McKay Bay Refuse-to-Energy Facility
Hillsborough County

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit modification to the City of Tampa to: replace and improve the air pollution control systems; add natural gas auxiliary burners for improved combustion control; define process throughput parameters; increase amount of waste that can be burned on a short-term basis, and specify which materials can be burned at its solid waste energy recovery facility located at 107 North 34th Street, Tampa, Hillsborough County, Florida, 33602.

The purpose of the project is to comply with 40 CFR 60, Subpart C - Emission Guideline and Compliance Times for Municipal Waste Combustors That Are Constructed on or Before December 19, 1995. The Emission Guideline was developed pursuant to Section 129 (Solid Waste Combustion) of the Clean Air Act as amended in 1990. These requirements are incorporated into Department Rule 62-204.800(8), F.A.C.

The facility consists of four nominal 250 ton per day (TPD) mass burn furnaces with rotary kilns, waste heat boilers, ash discharge system, a single 22.5 megawatt steam electric generator, and air pollution control equipment. The proposed improvements consist of upgrading the existing four mass-burn units to achieve greater combustion control and improve combustion efficiency, as well as replacing the existing electrostatic precipitators with lime spray dryer absorbers and fabric filters. This will add acid gas control for sulfur dioxide and hydrogen chloride, improve particulate (PM/PM10) collection efficiency, and enhance collection of heavy metals, including lead and cadmium. An activated carbon injection system will be installed for additional mercury control. Nitrogen oxides will be controlled by selective non-catalytic reduction. Combustion controls and auxiliary natural gas burners will be incorporated to minimize formation of dioxins and furans, volatile organic compounds, and carbon monoxide.

The original PSD permit contained limits and annual testing requirements only for sulfur dioxide, nitrogen oxides, lead, fluoride, mercury and beryllium. Specific limits and testing requirements are proposed for all previously mentioned pollutants and also for particulate matter, opacity, hydrochloric acid, carbon monoxide, cadmium and dioxins/furans. Continuous emission monitors will be installed for sulfur dioxide, nitrogen oxides, and carbon monoxide.

The units were originally permitted to utilize refuse such as garbage and trash as defined in the Department's solid waste rules. The modified permit will specify the wastes as solid waste including municipal solid waste (MSW) as defined at 40 CFR 60.5 lb and Section 403.706(5), F.S., segregated wastes such as records and documents, non-hazardous construction, clean wood and land clearing debris, packaging materials, clothing and fabric remnants

Legals

and certain types of floor covering; segregated waste tires (not to exceed 2 percent of the total wastes received); other segregated wastes (not to exceed 5 percent of the total wastes received) such as construction and demolition debris, oil spill debris, expired or off-spec packaged or unpackaged consumable goods (e.g. pharmaceuticals), consumer products, waste materials containing oil, used oil and filters and certain other wastes similar to MSW. The precise nature of the wastes is detailed in the draft permit package. By limiting the amount of segregated materials combusted at the facility, the Department has reasonable assurance that the overall composition of the wastes burned will be within the typical characteristics of MSW in terms of heating value, moisture, ash, and emissions characteristics.

Presently, the permitted waste throughput is 1000 TPD for the facility on an average annualized basis. The maximum allowable heat input rate per unit will be limited to 120 mmBtu/hr at a daily waste throughput of 288 TPD (1,152 TPD for the facility), with a long-term limit of 250 TPD for each unit.

The Department will issue the FINAL Permit Modification, in accordance with the conditions of the DRAFT Permit Modification 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 concerning the proposed DRAFT Permit Modification Issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #555, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit Modification, the Department shall issue a Revised DRAFT Permit Modification and require, if applicable, another Public Notice.

The Department will issue FINAL Permit Modification with the conditions of the DRAFT Permit Modification unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57 F.S. The procedures for petitioning for a hearing are set forth below. Mediation is not available for this action.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #25, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4928. Petitions 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. A petitioner must 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 of the approval of the presiding officer upon the filing of a motion

Legals

In compliance with Rule 28-3207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by petitioner, if any; (e) A statement of the facts that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require reversal or modification of the Department's action or proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action that the petitioner wants the Department to take with respect to the Department's action or proposed action addressed in this notice of intent.

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 of intent. 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:

- Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 904/488-1344
Fax: 904/482-6970
- Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6084
- Hillsborough County
Environmental Protection Commission
1900 Ninth Avenue
Tampa, Florida 33605
Telephone: 813-272-5960
Fax: 813/272-5157

The complete project file includes the Draft Permit Modification, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section of 111 South Magnolia Drive, Suite 4, Tallahassee, Florida, 32301 or call 904-488-1344, for additional information.

1221 2/18/98

IN THE HIGH COURT OF JUDICATURE AT BOMBAY TESTAMENT AND INTERSTATE JURISDICTION PETITION NO.329 OF 1995


PETITION for Probate of the last will and Testament dated 26th November 1988 of Miss Freney Cooverji Avari alias Miss Freney C. Avari alias Miss F. C. Avari Parsi Zoroastrian inhabitant domiciled in England and Wales, a Retired Spinster, aged 75 years, residing at the time of her death at Flat 1 Norland Square Mansions, Norland Square London, DECEASED


T. Mr. Jehangir Rustum Gogoi a Solicitor and a partner in the Firm of M/S Gogoi & Co, Advocates, Solicitors & Notaries having its office of All Chambers, Nagindas Mas-

Florida Department of
Environmental Protection

Memorandum

TO: Alice H. Harmon
Via Fax 813-272-5605

THRU: Joe Kahn, P.E. 

FROM: Susan DeVore 

DATE: January 12, 1998

RE: City of Tampa - McKay Bay Refuse-to-Energy Facility (MBREF)
0570127-002-AC

Thanks for your comments. As we understand, one main issue, the definition of municipal solid waste, still remains unclarified and of significant concern to the EPC. EPC suggests that the permit be specific in defining what is allowed or not allowed to be burned and the origin of the waste. The Department intends that the permit specify what is allowed or not allowed to be burned. We are working with MBREF to more specifically identify the types of wastes to be burned. There appears to be no emissions increase resulting from the addition and clarification of the types of waste allowed to be burned at MBREF.

The new fuels proposed by MBREF are similar in nature to the old and many are essentially the same types of waste as municipal solid waste. Subparts Cb and Eb are not intended to limit the waste burned to solely MSW. In fact, EPA makes this quite clear in the MWC NSPS background information document. In response to a comment regarding combustion of industrial wastes, EPA writes:

The definition of MSW is intended to specify which types of waste trigger a combustion facility to be covered under the MWC rule. The definition of MSW does not define, as the commenters claim, limits to the types of waste that an MWC can combust. Nowhere is it stated in the rule that there is any limit on the type of waste an MWC can combust. In fact, the definition of "cofired combustor" specifically states that a unit combusting more than 30 percent MSW is an MWC. An MWC is not prohibited under this rule from combusting non-MSW items such as railroad ties, telephone poles, or industrial manufacturing wastes.

Therefore, we intend to add and clarify the waste types allowed to be burned, consistent with the approach that emissions should not increase because of the addition of waste types.

The definition of modification pursuant to 40 CFR 60.2 includes any physical change in, change in the method of operation of, an existing facility *which increases the amount of any air pollutant emitted* into the atmosphere by that facility. As EPC pointed out there is a change in operation related to the expansion of waste types, but that change alone does not result in an increase in the actual emissions of any air pollutant, so in this case that expansion of waste types is not a modification. Since it is not a modification, it does not trigger a PSD review.

We appreciate the comments and input from EPC on this facility. If there are any further concerns, please do not hesitate to contact me at 850/488-1344.

P.E. Certification Statement

City of Tampa
McKay Bay Refuse-to-Energy Facility

Permit No.: 0570127-002-AC
PSD Permit No.: PSD-FL-086(A)
Facility ID No.: 0570127

Project Type: Draft Air Construction Permit
Facility Improvements

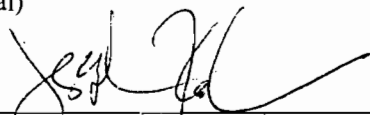
Project Description:

Facility improvements to substantially replace or rebuild the existing municipal waste combustion facility. This retrofit project will upgrade the existing four mass-burn combustion units to achieve greater combustion control and improve combustion efficiency, as well as replace air pollution control equipment, to comply with the emission limits and monitoring requirements of the Federal emission guidelines for large municipal waste combustors, 40 CFR 60 Subpart Cb.

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 myself and Susan DeVore under my responsible supervision.

(Seal)



Joseph Kann, P.E.

2/4/98
Date

Permitting Authority:

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

Telephone: 850/488-1344
Fax: 850/922-6979

Memorandum

To: Al Linero, P.E. *al*
From: Joe Kahn, P.E. *JK*
Date: January 12, 1998
Re: City of Tampa McKay Bay, Emission Guidelines Retrofit, PSD Applicability

Per our meeting this morning and later discussion with Dan Strobridge of CDM, the following summarizes emissions for this project, and specifies the limits that will be imposed to avoid PSD applicability.

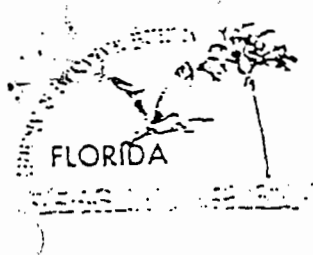
The facility currently has four operating mass-burn combustion units, each with a nominal capacity of 250 tons per day of solid waste with a heat content of 5000 Btu/lb. The facility produces steam which is used to produce electricity. The generator nameplate rating is 22.5 MW for the entire facility. Currently, each unit has a reciprocating grate furnace coupled to a rotary kiln, a waste heat boiler, an ESP and ash handling facilities. The proposed project will consist of extensive physical changes. The applicant proposes to replace each unit with a new mass-burn furnace, additional or completely new boiler components, new ash handling facilities, and new APC equipment. The applicant also proposes to change the capacity basis from TPD of solid waste (specified only in the current AO permit) to steam production to match the requirements of the emission guidelines, and allow for operation within an operating window that will account for variation in the heating value of the incoming solid waste.

As we discussed, we will draft the permit to maintain the short term emission limits from the emission guideline or more stringent short term limits proposed by the applicant, and we will include rolling 12 month total emission limits for sulfur dioxide, NOx and CO that will avoid this project triggering a review under PSD.

Pollutant	Past Allowable Annual Emissions (TPY)	Past Actual Annual Emissions 5 yr. Avg. (TPY)	Proposed Allowable Annual Emissions (TPY)	Difference Past Actual - Prop. Allow. (TPY)	Proposed Allowable Emission Rate ⁽⁴⁾ (lb./hr)
PM	122	43	49	6	11.19
SO ₂	745	421 ⁽¹⁾	460 ⁽⁵⁾	39	163.47
NOx	1314	640 ⁽²⁾	679 ⁽⁵⁾	39	160.50
CO	no limit	87 ⁽⁶⁾	185 ⁽⁵⁾	98	47.72
VOC	39	7.7	no limit	---	no limit
Pb	14	1.07	0.788	<13>	0.18
Hg	3	0.6	0.243 (max. conc. limit)	<0.36>	0.055
Cd	no limit	0.097	0.073	<0.02>	1.67 E-2
Be	0.002	0.0001	0.002	0 ⁽³⁾	4.57 E-4
HCl	no limit	na	209 (max. conc. limit)	---	47.7
HF	26	na	26	---	5.9
Dioxin	no limit	na	5.37 E-5	---	1.21 E-5

Footnotes to table:

- (1) Average of last two years available data (1990 and 1991) is 421 TPY.
- (2) Average of last two years available data (1990 and 1991) is 633 TPY.
- (3) A review of the Beryllium test data (1985, 1991) suggests that tested emissions were below detection limits. Given the limited data, the short test duration and the low annual emission limits, a valid comparison of actual versus potential emissions is not possible. The proposed permit limit will therefore be set at the previous allowable.
- (4) Proposed allowable emission rates are the lb./hr equivalent emission rate of the Subpart Cb emission limitations or more stringent limitations requested by the applicant. Emissions of sulfur dioxide, NOx and CO are further limited by the longer-term rolling 12 month limitations (see footnote (5), below).
- (5) Rolling 12 month emission limits will be imposed for sulfur dioxide, NOx and CO to maintain annual emissions below PSD significance levels.
- (6) Based on one test, 1985



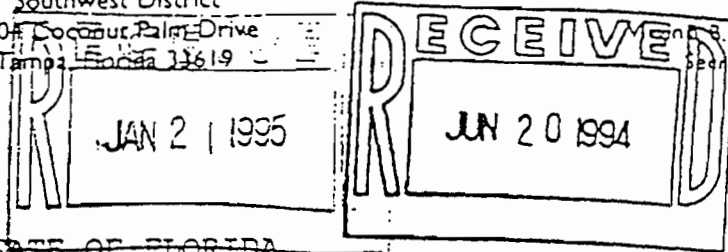
GARY

Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

John B. Wetherell
Secretary



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT AMENDMENT

CERTIFIED MAIL

Ms. Nancy McCann
Urban Environmental Coordinator
Office of Environmental Coordination
City of Tampa
City Hall Plaza, 5N
Tampa, FL 33602

DER File No.: AO29-206279
County: Hillsborough

Enclosed is amended Permit Number AO29-206279 to operate the McKay Bay Refuse-to-Energy facility, issued pursuant to Section 403.087, Florida Statutes.

A person whose substantial interests are affected by this amended permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, 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 2500 Blair Stone Road, Tallahassee 32399-2400, within fourteen (14) days of receipt of this amended permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends required reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amended permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice, in the Office of General Counsel at the above address of the Department. Failure to petition within the allotted time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This amended permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

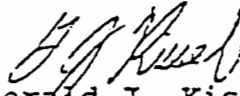
When the Order (amended Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

City of Tampa
Tampa, FL 33602

Page Three

Executed in Tampa, Florida

Sincerely,



Gerald J. Kissel, P.E.
District Air Engineer

GJK/SKW/bm

Attachment:

cc: Environmental Protection Commission
of Hillsborough County

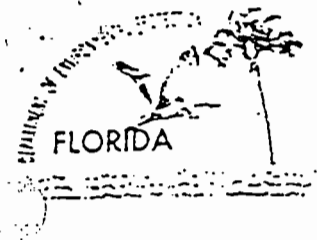
CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT AMENDMENT and all copies were mailed by certified mail before the close of business on JUN 17 1994 to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

- Marilyn Quispe
Clerk

JUN 17 1994
Date



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

PERMITTEE:
City of Tampa
City Hall Plaza, 5N
Tampa, FL 33602

PERMIT/CERTIFICATION
Permit No: AO29-206279
County: Hillsborough
Issuance Date: 9/1/92
Amendment Date: 06/17/94
Expiration Date: 08/01/97
Project: McKay Bay Refuse-to-
Energy Facility

This amended permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the department and made a part of hereof and specifically described as follows:

For the operation of four (4) 250 TPD municipal solid waste incinerators designated as Units 1, 2, 3, and 4, respectively, from west to east. Municipal Solid Waste includes any solid waste, except for sludge, resulting from the operation of residential, commercial, governmental, or institutional establishments that would normally be collected, processed, and disposed of through a public or private solid waste management service. The term includes yard trash, but does not include solid waste from industrial, mining, or agricultural operations. Waste tires and waste oil may be incinerated under certain limitations and restrictions specified in the Specific Conditions.

Each incinerator is equipped with a 37,500 dscfm F.L. Smidth, Model F300, 2-field electrostatic precipitator to control particulate matter emissions. Units 1 and 2 share the same stack exhaust. Units 3 and 4 share the same stack exhaust. Each stack exhaust is equipped with a certified opacity monitor.

Fly ash collected by the electrostatic precipitator is pneumatically conveyed to the fly ash silo and then gravity fed onto the bottom ash drag conveyor where it is wetted. The ash handling system is designed to load the ash into tarped open bed trucks, via front-end loader, after dewatering. Particulate matter emissions generated during fly ash silo loading are controlled by a Flex-Kleen, Model BVBC-36 (IIG) 2109 ACFM baghouse. Fugitive emissions are controlled by the use of water as a dust suppressant.

Location: 107 North 34th Street, Adjacent to McKay Bay, Tampa

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO29-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

PROCESS DESCRIPTION: (continued)

UTM: 17-360.0 E 3091.9 N NEDS NO: 0127 Point ID: 01 - Unit
No. 1
02 - Unit
No. 2
03 - Unit
No. 3
04 - Unit
No. 4
05 - Fly Ash
Silo

Replaces Permit No.: AO29-114760

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO29-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. Maximum allowable emissions from the following sources shall not exceed [PSD-FL-086 and AC29-47277 and Rule 17-4.070(3), F.A.C.]

<u>Source</u>	<u>Pollutant</u>	<u>Emission Limitation</u>
Combined Units 1-4	Particulate Matter	0.025 gr/DSCF, corrected to 12% CO ₂ and 27.9 lbs./hr.
	Sulfur Dioxide	170.0 lbs./hr.
	Nitrogen Oxides	300.0 lbs./hr.
	VOC	9.0 lbs./hr.
	Lead	3.1 lbs./hr.
	Fluoride	6.0 lbs./hr.
	Mercury (vaporous and particulate)	0.6 lbs./hr.
	Beryllium	5 grams/24 hour period and 0.00046 lbs./hr.
Fly Ash Silo	Particulate Matter	0.025 gr/DSCF, up to 0.36 lbs./hr.

3. Visible emissions shall not exceed the following, except as noted in Specific Condition No. 4: [AC29-47277, Rule 17-2.510(8)(d)2., F.A.C. and Rule 17-2.650(2)(c)11., F.A.C.]

<u>Source</u>	<u>Emission Limitation</u>
Units 1-2 (West Stack)	15%
Units 3-4 (East Stack)	15%
Fly Ash Silo	5%

4. Excess emissions resulting from start-up, shutdown or malfunction of any unit shall be limited to a total of 2 hours in any 24 hour period provided best operational practices are adhered to and the duration of excess emissions are minimized. Best operational practices shall include but are not limited to: [Rule 17-2.250(1), F.A.C.]

- A) Using the least pollution causing material available on site to charge the furnace on start-up.
- B) Turning on the electrostatic precipitator as soon as possible but no later than two hours after the furnace is ignited.

The permittee shall maintain a log detailing the following information on every start-up of a unit:

- A) Time (to the nearest minute) at which the furnace is ignited.
- B) Time (to the nearest minute) at which the electrostatic precipitator is turned on and operational.

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO29-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

SPECIFIC CONDITIONS:

- C) Temperature of the flue gas at the electrostatic precipitator inlet when it is turned on.
- D) Six minute opacity reading taken from the opacity monitor strip chart beginning at two hours following the ignition of the furnace.

5. This permit authorizes the permittee to incinerate municipal solid waste, as defined in the project description, and waste oil from spills cleaned up by the Port Authority. The municipal solid waste may be generated outside the city limits. It may include waste tires as they are collected as part of the normal waste stream (not segregated) and do not exceed more than 3% of the total charge at any given time. The waste oil can not exceed 10,000 gallons per day from tanker trucks or 10 tons per day from fiber drums. No other materials, to include water treatment plant sludges, biomedical waste, radiological waste or hazardous waste, are to be incinerated at this facility. [PSD-FL-086, AC29-47277 and Rule 17-4.070(3), F.A.C.]

6. No auxiliary fuels or segregated materials other than those normally contained in MSW are to be used to raise the BTU content unless prior authorization is received from the Florida Department of Environmental Protection and the Environmental Protection Commission of Hillsborough County. [Rule 17-4.070(3), F.A.C.]

7. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 17-2.620(2), F.A.C.]

8. Test the emissions from each unit for the following pollutant(s) at intervals of 12 months (\pm 30 days) from October 29, 1991 and submit 2 copies of test data to the Air Section of the Environmental Protection Commission of Hillsborough County office within forty-five days of such testing. Testing of all four units for each pollutant shall be conducted in a consecutive five day period (except that the EPC may extend the five day test period when required by conditions beyond the control of the permittee) and shall be consistent with the requirements of Rule 17-2.700(2), F.A.C.:

(X) Particulates (X) Lead
(X) Opacity

* The visible emissions readings on each of the two stacks shall be at least 60 minutes in duration and shall be conducted simultaneously with the particulate testing. Both units which share a common stack shall be in operation during the visible emission test.

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO29-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

SPECIFIC CONDITIONS: (continued)

9. Test the emissions from each unit for the following pollutant(s) six months prior to the expiration date of this permit and submit 2 copies of test data to the Air Section of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing of all four units for each pollutant shall be conducted within a consecutive five day period (except that the EPC may extend the five day test period when required by conditions beyond the control of the permittee) and shall be consistent with the requirements of Rule 17-2.700(2), F.A.C.:

(X) Volatile Organic Compounds	(X) Total Fluorides
(X) Mercury	(X) Beryllium
(X) Nitrogen Oxides	(X) Sulfur Dioxide

10. Test the emissions from the fly ash silo for the following pollutant(s) at intervals of 12 months (\pm 30 days) from October 29, 1991 and submit 2 copies of test data to the Air Section of the Environmental Protection Commission of Hillsborough County office within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 17-2.700(2), F.A.C.:

(X) Particulates^{*}
(X) Opacity

* In lieu of a stack test, the permittee may submit an EPA Method 9 testing showing no visible emissions pursuant to Rule 17-2.700(3)(d), F.A.C., except upon permit renewal. Upon permit renewal the EPA Method 9 test may not be substituted for the stack test. The Method 9 test interval shall be at least 60 minutes in duration on the fly ash silo. Should the Department have reason to believe the particulate emission standard is not being met, the Department may require that compliance with the particulate emission standards be demonstrated by testing in accordance with Rule 17-2.700, F.A.C.

11. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rules 17-297.340(1)(i) and 17-209.500, F.A.C]

12. Compliance with the emission limitations of Specific Condition Nos. 2 and 3 shall be determined using EPA Methods 1, 2, 3, 5, 6, 7, 9, 12, 13A/13B, 25A/25B, 101A and 104 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO:
PROJECT: McKay Bay Refuse-to-
Facility

SPECIFIC CONDITIONS: (continued)

13. Testing of emissions shall be conducted within 90-100% of the maximum permitted charging rate of 10.5 tons/hr. for each unit and all four (4) units in operation for the fly ash silo testing. A compliance test submitted at operating levels less than 90% of the maximum permitted rate will automatically constitute an amended permit at the lesser rate plus 10% until another test (showing compliance) at a higher rate, not to exceed 10.5 tons/hr., is submitted to the Department and the Environmental Protection Commission of Hillsborough County. Acceptance of said tests by the Department and the Environmental Protection Commission of Hillsborough County will constitute an amended permit at the greater rate. The rates are not to exceed the maximum permitted rates. Emission limitations are not automatically adjusted above the allowables established by this permit and/or the maximum permitted rate. Failure to submit the charging rates during testing which do not reflect actual operating conditions may invalidate the data. [Rule 17-4.070(3), F.A.C.]

14. Operation and Maintenance Plan for Particulate Control: [Rule 17-2.650(2), F.A.C.]

A) Process Parameters:

1. Source Designators: Unit Nos. 1-4
2. Maximum Charging Rate: 250 tons per day per unit,
1000 tons per day total
3. Maximum Heat Input Rate: 2,500 MMBTU/day/line,
10,000 MMBTU/day total
4. Permitted Operating Schedule: 24 hrs./day, 7 days/wk.,
52 wks./yr.
5. Furnace Temperature: 1800-2400° F.
6. Fuel Type: Unsorted Municipal Solid Waste
7. Design Fuel Analysis: Carbon-25.6%, Nitrogen-0.58%,
Hydrogen-3.7%, Sulfur-0.3%,
Oxygen-22.75%, Moisture-30.0%,
Non-combustibles-18.0%
8. Combustion Conditions: 50-120% excess air
7-11% O₂ in flue gas
9. Steam Pressure: 650 psig at turbine inlet
10. Steam Temperature: 700° F. at turbine inlet
11. Steam Production: 208,400 lbs./hr. total normal flow rate
12. Maximum Permitted Electric Output: 25 MW

B) Pollution Control Equipment Parameters:

1. Control Equipment Type: 4 Electrostatic Precipitators
2. Model Name and Number: F.L. Smidth Model F300
3. Design Flow Rate: 37,500 dscfm/line, 75,000 dscfm/stack
4. Primary Voltage: 480V
5. Primary Current: 89A

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO29-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

SPECIFIC CONDITIONS: (continued)

6. Secondary Voltage: 25,000-45,000 VDC
7. Secondary Current: 800 mA
8. Design Collection Efficiency: 99.45%
9. Stack Height Above Ground: 160 ft./stack
10. Stack Diameter: 5.75 ft. each stack
11. Exit Gas Temperature: 450-600° F. each stack
12. Exit Gas Moisture: 14%

- C) The following observations, checks and operations apply to this source and shall be conducted on the schedule specified:

Continuously Monitored

1. Opacity
2. Temperatures^{*}
 - a. ESP Inlet and Outlet
 - b. Furnace
 - c. Bypass
 - d. Kiln Outlet
 - e. Secondary Superheater Outlet Steam

* Monitored every 5 seconds and a summed average is recorded every hour.

Every Four Hours

1. Monitor/inspect fly ash removal equipment and handling system
2. Observe fly ash silo operation, if unit is in operation
3. Primary voltage (ESP)
4. Primary current (ESP)
5. Secondary voltage (ESP)
6. Secondary current (ESP)

Daily

1. Monitor T/R temperature (ESP)
2. Monitor hours of operation per line

Weekly

1. Check lubrication on all external bearings, chains, idlers, sprockets
2. Lubricate fly ash collecting equipment, as needed
3. Spark rate
4. Rapper frequency
5. Rapper duration
6. Check gear box reservoir oil levels

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: A029-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

SPECIFIC CONDITIONS: (continued)

Semi-Annually (during maintenance outages)

1. Inspect precipitators internals; observe dust build-up, corrosion
2. Check alignment of plates and electrodes
3. Inspect rappers, observe for cracking on rapper frame assembly
4. Clean rapper insulator bushing
5. Clean electrode bushings
6. Check screw conveyor bearings
7. Inspect all field connections, door frames, duct connections for corrosion
8. Replace door frame gaskets as needed.
9. Inspect internal structural members for corrosion and integrity
10. Clean relay cabinets, clean motor starter and relay contacts
11. Check hopper heaters for proper operation
12. Check insulator housing heaters for proper operation
13. Lubricate key interlock system

Annually

1. Hoppers and inlet distribution baffles are visually checked for wear
2. Wire thickness is checked visually
3. Check precipitator earth ground connection
4. Inspect collection plates for corrosion
5. Check external structural members for integrity
6. Run T/R oil analysis

D) Records:

Records of inspections, maintenance, and performance parameters shall be retained for a minimum of two years and shall be made available to the Department or Environmental Protection Commission of Hillsborough County upon request. [Rule 17-2.650(2)(g)5., F.A.C.]

15. The permittee shall calibrate, operate and maintain a continuous monitoring system in accordance with Rule 17-2.710(1), F.A.C. to monitor in-stack opacity.

16. The permittee shall record and keep on file the daily charging rate and hours of operation of each unit and report this information quarterly to the Environmental Protection Commission of Hillsborough County. [40 CFR 60.53(a) and PSD-FL-086]

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO29-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

SPECIFIC CONDITIONS: (continued)

17. The permittee shall provide a written quarterly report of excess emissions. For purposes of this report, excess emissions shall be all air pollutant emissions in excess of the permitted levels stated in Specific Condition Nos. 2 and 3 of this permit. Quarterly reports shall be submitted no later than 30 days from the end of each calendar quarter and shall include the following: [40 CFR 60.7(c) and Rule 17-4.070(3), F.A.C.]

- A) The magnitude of excess emissions including the date, time and duration.
- B) Nature and cause of excess emissions and the corrective action taken.
- C) Date and time opacity monitors were inoperable except for zero and span and the nature of the repairs or adjustments.
- D) Statement that excess emissions have or have not occurred and/or a statement that the opacity monitors were or were not inoperable.

18. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information pursuant to Subsection 403.061(13), Florida Statutes:

- A) Annual amount of materials and/or fuels utilized.
- B) Annual emissions (note calculation basis).
- C) Any changes in the information contained in the permit application.

Duplicate copies of all reports shall be submitted to the Environmental Protection Commission of Hillsborough County.

19. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter at the facility in accordance with the provision in Rule 17-2.610(3), F.A.C.:

- A) Use of tarps on trucks transporting ash.
- B) Apply water or dust suppressants to all paved and unpaved roads to minimize fugitive emissions on the facility site.
- C) Maintain vehicular speed to a minimum (10 MPH or less) on the facility site. Post signs.
- D) Exercise good housekeeping at all times.
- E) Use of water, as necessary, as a dust suppressant during the loading of trucks.

20. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-2, F.A.C., or any other requirements under federal, state, or local law. [Rule 17-2.210, F.A.C.]

PERMITTEE:
City of Tampa

PERMIT/CERTIFICATION NO.: AO29-206279
PROJECT: McKay Bay Refuse-to-Energy
Facility

SPECIFIC CONDITIONS: (continued)

21. An application for renewal of permit to operate this source, completed in quadruplicate, shall be submitted to the Department and a copy to the Environmental Protection Commission of Hillsborough County at least 60 days prior to its expiration date. [Rule 17-4.090, F.A.C.]

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

H.A. Kiesel, P.E.
for Richard Garrity, Ph.D.
Director of District Management

ATTACHMENT - GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

GENERAL CONDITIONS:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

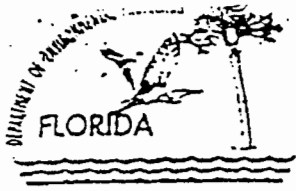
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

GENERAL CONDITIONS:

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Compliance with New Source Performance Standards (NSPS)
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



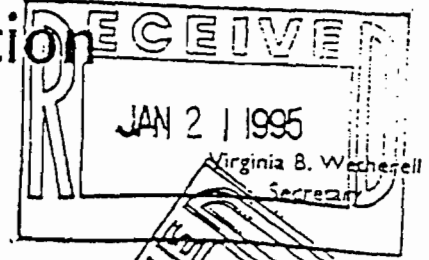
Best Available Copy

Department of Environmental Protection

REC'D
-21-10-94

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

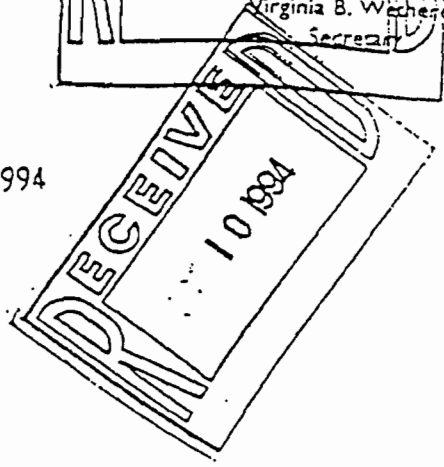


NOTICE OF PERMIT

OCT - 6 1994

Ms. Nancy McCann
Environmental Coordinator
City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

FOR YOUR INFORMATION
Nancy McCann



Dear Ms. McCann:

Enclosed is the modification #256823 to existing Permit Number SO29-204205, issued pursuant to Section(s) 403.087(1), Florida Statutes.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 17-103 and 28-5.201, F.A.C., and must be filed (received) in the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, 32399-2400, within fourteen (14) days of receipt of this notice. Failure to file a petition within fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes. This permit is final and effective on the date filed with the Clerk of the Department unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

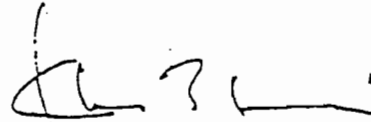
When the Order (Permit) is final, any party to the Department has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, 32399-2400; 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 of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Ms. Nancy McCann
City of Tampa
Permit No.: S029-204205

OCT - 6 1994
Page Two

Executed in Tampa Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Kim B. Ford, P.E.
Solid Waste Section
Division of Waste Management

KBF/ab
Attachment

cc: Greig Grotecloss, City of Tampa
Paul Schipfer, HCEPC
Kathy Anderson, FDEP Tallahassee
Robert Butera, P.E., FDEP Tampa
Steve Morgan, FDEP Tampa

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on OCT - 6 1994 to the listed persons.

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(10), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


Clerk

OCT - 6 1994
Date



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

OCT - 6 1994

PERMITTEE

Ms. Nancy McCann
Environmental Coordinator
City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

RE: Modification to existing permit.
Permit No. SO29-204205, Hillsborough County
McKay Bay Refuse-to-Energy Facility

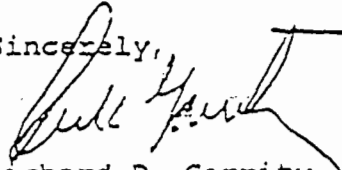
Dear Ms. McCann:

We are in receipt of the City of Tampa's August 29, 1994 request for permit modification #256823 to modify the solid waste permit #SO29-204205.

<u>SPECIFIC CONDITIONS</u>	<u>FROM</u>	<u>TO</u>	<u>TYPE OF MODIFICATION</u>
#13.		New	Ash Conditioning System

This letter and its attachments constitute a complete permit and replace all previous permits and permit modifications for the above referenced facility.

Sincerely,


Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/kbfb
Attachments

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

November 7, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Nancy McCann
Urban Environmental Coordinator
Office of Environmental Coordination
City Hall Plaza, 5N
Tampa, Florida 33602

Dear Ms. McCann:

Re: Amendment to Construction Permit AC 29-47277 *McKey Bay Refuse-to-
Energy*

The department is in receipt of your request to amend the above referenced state construction permit to reflect the "as built" construction of the facility. The amendment to the permit allows for the construction of a flyash storage silo. Particulate matter emissions will be controlled by use of a baghouse filter and are in accordance with the department's determination of Lowest Achievable Emission Rate for particulate matter. The department is in agreement with the request and the following shall be added or changed:

Expiration Date:

From: April 30, 1986
To: December 31, 1986

Specific Conditions:

9. Particulate matter emissions from the flyash storage silo shall not exceed 0.025 grains per dry standard cubic foot or 0.36 pound per hour based on a maximum flow rate of 2109 acfm.
10. Visible emissions from the flyash storage silo shall not exceed 5% opacity. Compliance with this limit shall be demonstrated by DER Method 9 in accordance with the requirements of section 17-2.700, FAC.
11. The permittee shall provide HCEPC and SWFDER at least 30 days advanced written notice of the startup date of the flyash storage silo.

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1 Show to whom, date and address of delivery
 2 Restricted Delivery

3 Article Addressed to
 Ms. Nancy McCann
 Urban Environmental Coord.
 City Hall Plaza, 5N
 Tampa, Florida 33602

4 Type of Service: Article Number
 Registered Insured
 Certified COD P 408 532 060
 Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED:**

5 Signature - Addressee
 X

6 Signature - Agent
 X *[Signature]*

7 Date of Delivery
 NOV 14 1986

8 Addressee's Address (ONLY if requested and fee paid)

P 408 532 060

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Ms. Nancy McCann	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return Receipt Showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
11/12/86	

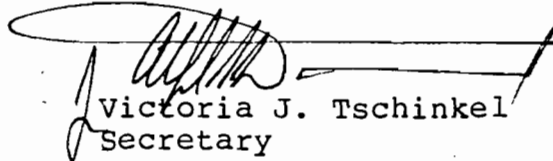
PS Form 3800, Feb. 1982

Ms. Nancy McCann
Page Two
November 7, 1986

12. The visible emissions tests for the flyash storage silo must be accomplished within 5 days of startup of the silo.
13. Should HCEPC or the Department have reason to believe the particulate emission standard is not being met, HCEPC or the Department may require that compliance with the particulate emission standards be demonstrated by testing in accordance with EPA Methods 1, 2, 3, 4, and 5.
14. Within 45 days of initial compliance testing of the source, test results along with 4 copies of a completed Certificate of Completion of Construction form shall be submitted to the HCEPC.

This letter must be attached to your construction permit, AC 29-47277, and shall become a part of that permit.

Sincerely,


Victoria J. Tschinkel
Secretary

VJT/ks

cc: Bill Thomas, SW District
Victor San Augustin, HCEPC

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE

To: _____ LOCTN: _____
To: _____ LOCTN: _____
To: _____ LOCTN: _____
FROM: _____ DATE: _____

TO: Victoria J. Tschinkel
FROM: Clair Fancy *John Brown for*
DATE: November 7, 1986
SUBJ: Amendment to Construction Permit AC 29-47277

Attached for your approval and signature is a letter amending the above referenced air construction permit to the City of Tampa. The bureau recommends your approval and signature.

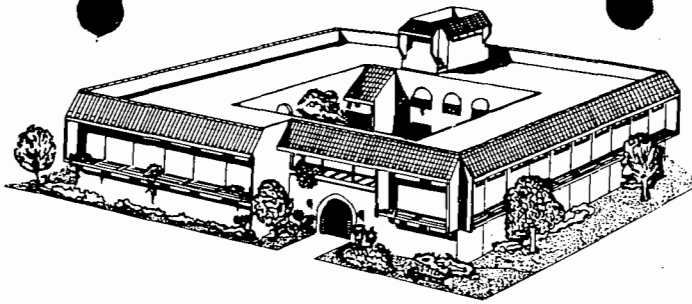
CF/pa

Attachment

HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION

COMMISSION

RODNEY COLSON
RON GLICKMAN
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
JAMES D. SELVEY
PICKENS C. TALLEY II



ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
TAMPA, FLORIDA 33605

TELEPHONE (813) 272-5960

MEMORANDUM

Date October 22, 1986

To Clair Fancy, BAQM

From Victor San Agustin thru Jerry Campbell *VSA Jc*

Subject: Amendment to McKay Bay RTE Permit AC29-4277

This memo is in reference to an application from the City of Tampa requesting that the above construction permit be amended to include a flyash silo. The recommendations below are for your consideration.

We have no objections to the amendment request. The following recommendations are offered for your consideration.

1. The particulate emission standard shall be 0.02 gr/acf or 0.36 lbs/hr based on a maximum flow rate of 2109 acfm. (See footnote * below)
2. Visible emissions shall not exceed 5% opacity. [Section 17-2.510, FAC]
3. The permittee shall provide HCEPC and SWFDER at least 30 days advanced written notice of the date of restart of the silo. (Flyash is currently conveyed to the wet quench pit.)
4. Within 5 days after restart of the silo, test the silo baghouse exhaust for visible emissions in accordance with the requirements of Section 17-2.700, F.A.C.
5. Should HCEPC or the Department have reason to believe the particulate emission standard is not being met, HCEPC or the Department may require that compliance with the particulate emission standards be demonstrated by testing in accordance with EPA Methods 1, 2, 3, 4, and 5.
6. Within 45 days of initial compliance testing of the source, test results along with 4 copies of a completed Certificate of Completion of Construction form shall be submitted to the HCEPC.

APIS will be updated for this point when we process operating permits for the four units.

If you have any questions regarding the implementation of the above conditions, please call me at SC 571-5960.

*0.02 gr/acf was recommended as a requested LAER by the applicant. Baghouse manufacturer guarantees this value will not be exceeded.

cc: Bill Thomas, SWFDER

VSA/ch

DEI

OCT 27 1986

BAQM

PS Form 3811, July 1983

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
 2. Restricted Delivery.

3. Article Addressed to:
 Mr. Mike Salmon
 City of Tampa
 City Hall Plaza, 5 North
 Tampa, FL 33602

4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD	Article Number 0155814
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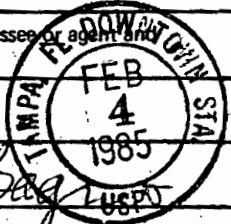
Always obtain signature of addressee or agent.
DATE DELIVERED.

5. Signature - Addressee
 X

6. Signature - Agent
 X *Robert Sag*

7. Date of Delivery
 02-04-85

8. Addressee's Address (ONLY if requested and fee paid)



DOMESTIC RETURN RECEIPT

No. 0155814
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO		Mr. Mike Salmon
STREET AND NO.		
P.O., STATE AND ZIP CODE		
POSTAGE		\$
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE	¢
	SPECIAL DELIVERY	¢
	RESTRICTED DELIVERY	¢
	OPTIONAL SERVICE: RETURN RECEIPT SERVICE	
	SHOW TO WHOM AND DATE DELIVERED	¢
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES		\$
POSTMARK OR DATE		1/30/85

PS Form 3800, Apr. 1976

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

January 24, 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Mike Salmon, Administrator
Water Resources and Public Works
City of Tampa
City Hall Plaza, 5 North
Tampa, Florida 33602

RE: Request to extend the expiration date of construction
permit AC 29-47277

Dear Mr. Salmon:

The department has received your request to extend the expiration date of the above referenced state construction permit for the McKay Bay Refuse - to - Energy Project. The department is in agreement with the request and the following shall be added or changed:

Expiration Date:

From: December 31, 1984
To: December 31, 1985

Attachments to be incorporated:

5. M. Salmon's letter, dated June 4, 1984, requesting the extension.
6. C. Gonzalez's memorandum, dated August 10, 1984, on commencement of construction.

Mr. Mike Salmon
Page Two
January 24, 1985

7. C.H. Fancy's letter, dated August 31, 1984, requesting additional information.
8. J.D. Murdoch's letter, dated January 15, 1985, in response to seeking offsets.

This letter must be attached to your construction permit, AC 29-47277, and shall become a part of that permit.

Sincerely,



Victoria J. Tschinkel
Secretary

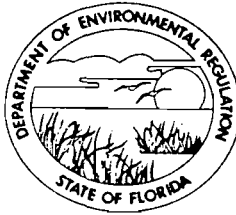
VJT/rw

Attachments

cc: Richard Garrity, Southwest District
Victor St. Augustine, Hillsborough EPC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

May 20, 1983

Mr. Dale H. Twachtmann
City of Tampa
McKay Bay Refuse-To-Energy Project
City Hall Plaza, 5N
Tampa, Florida 33602

Re: Modification of Conditions, Permit No. AC 29-47277

Dear Mr. Twachtmann:

We are in receipt of requests for modifications of the permit conditions. The specific conditions are changed as follows:

Specific Condition 2

From: Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

TO: Municipal waste and infectious waste shall be burned in the facility. Waste oil collected from spills cleaned up by the Port Authority not exceeding 10,000 gallons per day from tanker trucks or 10 tons per day of fiber drums shall also be burned. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Victoria J. Tschinkel
Secretary

VJT/ks

Issued this 20 day of May, 1983

Final Determination

Amendment to
McKay Bay Refuse-To-Energy Project
Hillsborough County

Permit Number
AC 29-47277

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

May 20, 1983

FINAL DETERMINATION

The City of Tampa's request to amend the construction permit of its McKay Bay Refuse-To-Energy Project to allow the incineration of infectious waste and waste oil recovered from oil spills has been reviewed by the Bureau of Air Quality Management. The department's Intent to Issue the permit was published in the Tampa Tribune on April 11, 1983.

Copies of the preliminary determination and technical review were available for public inspection at the Hillsborough County Environmental Protection Commission Office, the DER Southwest District Office, and the Bureau of Air Quality Management office.

No comments were received regarding this permit amendment. Therefore, it is requested that the permit conditions be issued as indicated in the preliminary determination.

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel
 FROM: Clair Fancy *Clair Fancy*
 DATE: May 20, 1983
 SUBJ: Approval of Air Construction Permit Amendment

Please find attached an amendment to the City of Tampa's permit for the McKay Bay Refuse-To-Energy Project to allow the incineration of infectious waste and waste oil recovered from oil spills.

The Bureau recommends your approval and signature.

CF/pa
 Attachment

RECEIVED
 MAY 23 1983

Office of the Secretary

Preliminary Determination
and
Technical Review

Amendment to
McKay Bay Refuse-To-Energy Project
Hillsborough County

Permit Number
AC 29-47277

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

February 1, 1983

Notice of Proposed Agency Action

The Department of Environmental Regulation gives notice of its intent to modify a permit to the City of Tampa to allow the incinerating of infectious waste and waste oil recovered from oil spills by the Port Authority at its McKay Bay Refuse-To-Energy Project in Hillsborough County. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and Department's intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

DER Southwest District
7601 Highway 301 North
Tampa, Florida 33610

Hillsborough County Environmental
Protection Commission
1900 Ninth Avenue
Tampa, Florida 33605

Comments on this action shall be submitted in writing to Bill Thomas of the DER Tallahassee office within thirty (30) days of this notice.

I. Project Description

A. Applicant:

City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

B. Project and Location

The applicant's proposed project consists of constructing an infectious waste handling facility to feed this type waste to the resource recovery units. Also permission to burn oil from spills recovered by the Port Authority has been requested. The facility is located in Tampa in Hillsborough County. The universal transverse mercator (UTM) coordinates of the source are zone 17, 360.0 km East and 3091.9 km North.

C. Project Description and Controls

The resource recovery facility will be modified by the addition of an infectious waste loading area at the rear of the facility. The bagged infectious waste will be transferred to portable buckets. The buckets will be wheeled into an elevator and transported to the feed chute for the incinerator, where they will be mechanically discharged into the chute. Workers will not come into direct contact with the waste and no infectious wastes will be discharged directly into the refuse pit.

The facility operation will also be modified by allowing the incineration of waste oil collected by the port authority from the clean up of oil spills. The oil will be delivered to the resource recovery facility by tanker truck or in polyethylene pads packed in fiber drums. Recovered oil from the tanker trucks would be sprayed onto the refuse in the pit. The fiber drums would be placed directly into the combustion train. The facility would accept no more than 15,000 gallons per day of oil from tankers or 10 tons per day of fiber drums. This will increase the heat content of the municipal waste. It is estimated that an average of 10,000 gallons per year will be disposed of by this method.

Since the capacity of the resource recovery units are not being increased, the control equipment will adequately control the emissions generated at the facility. Emission limitations will be the same as those issued previously.

II. Rule Applicability

The proposed project does not meet the definition of a modification as contained in Florida Administrative Code Rule 17-2.100 (102) since actual emissions are not increased.

Therefore, the new source review requirements for nonattainment areas and the new source review requirements for prevention of significant deterioration areas are not applicable.

The proposed project is a significant change to permit specific conditions. Therefore, the public must have opportunity for comment before the amendment can be issued.

III. Summary of Emissions and Air Quality Analysis

A. Emission Limitations

The maximum hourly and the annual emission limitations are unchanged by this proposal. The hourly and annual throughput rates of feed to the incinerator also remain the same. Therefore, the emission limitations previously issued, will not be amended.

B. Air Quality Analysis

Since there is no increase in emissions, an ambient air quality analysis is not required.

IV. Conclusions

Incineration is the preferred method of disposal of infectious waste. The Department of Health and Rehabilitative Services and the Department of Environmental Regulation have issued a joint memorandum which defines infectious waste and recommends incineration.

The usual method of disposal of infectious waste is using a pathological incinerator. The information provided with this proposal indicated the residence time of approximately 3.7 seconds at 1800° F will exceed the minimum temperature and residence time requirements for a pathological incinerator which are listed in the EPA document AP-40. Since separate handling procedures and equipment will be added to ensure safe handling of this waste and adequate destruction should be provided by the incinerator, the Department agrees to this change.

The other part of the proposal involves the incineration of oil which has been cleaned up from oil spills and collected by the Port Authority. This oil will be put on the waste in the refuse pit. Thus, the heating value of the municipal waste should increase and aid in its destruction. No increase in emissions is expected from this operation.

The specific conditions should be amended to allow these proposals, since the facility would remain in compliance with all applicable requirements of Chapter 17-2, FAC.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

February 1, 1983

Mr. Dale H. Twachtmann
City of Tampa
McKay Bay Refuse-To-Energy Project
City Hall Plaza, 5N
Tampa, Florida 33602

DRAFT

Dear Mr. Twachtmann:

Re: Modification of Conditions, Permit No. AC 29-47277

We are in receipt of requests for modifications of the permit conditions. The specific conditions are changed as follows:

Specific Condition 2

From: Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

To: Municipal waste and infectious waste shall be burned in the facility. Waste oil collected from spills cleaned up by the Port Authority not exceeding 10,000 gallons per day from tanker trucks or 10 tons per day of fiber drums shall also be burned. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Victoria J. Tschinkel
Secretary

VJT/ks



CITY OF TAMPA

Bob Martinez, Mayor

McKAY BAY REFUSE-TO-ENERGY PROJECT

November 9, 1982

Mr. Clair Fancy
 Department of Environmental Regulation
 Bureau of Air Quality
 2600 Blair Stone Road
 Tallahassee, Florida 32301

DER
 NOV 17 1982
 EAGON

Dear Mr. Fancy:

As you are aware, the City of Tampa has received permits from D.E.R. for construction of the McKay Bay Refuse-to-Energy Facility. The Facility is designed to burn solid waste from the City of Tampa and to simultaneously generate electricity. The City would also like to burn infectious waste in the Facility.

The Department of Health and Rehabilitative Services and D.E.R. have issued a joint memorandum which defines infectious waste and recommends incineration as the preferred method of disposal. While the City of Tampa's application to construct an air pollution source does not prohibit burning of infectious waste, the subject is not specifically addressed. The City therefore requests that your office confirm the acceptability of burning infectious waste in the McKay Bay Refuse-to-Energy Facility.

Special handling procedures and equipment have been added to the operation and construction plans for the Facility to insure safe handling of the infectious waste (see attached). Additionally, the Facility design will allow a residence time of approximately 3.7 seconds, at 1800°F, for all gases (attached). Also, as we have previously discussed, no radioactive waste will be disposed of at the incinerator.

If you have any questions concerning this request, please contact me. Thank you for your time and consideration.

Sincerely,

Joseph D. Murdoch
 Resource Recovery Management Analyst

JDM/dw

cc John Egan, EPC



Waste Management, Inc.
3003 Butterfield Road • Oak Brook, Illinois 60521

November 5, 1982

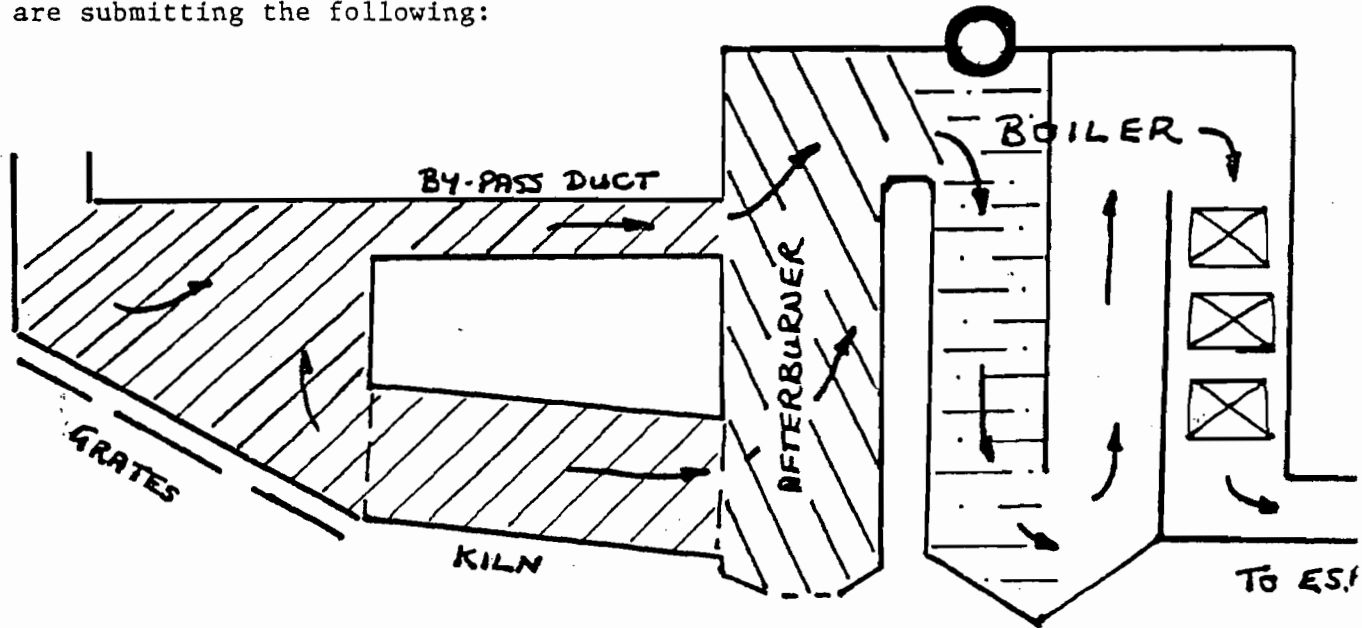
City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

Attention: Mr. Joe Murdoch

Subject: System Vólund - Gas Residence Time and Temperature

Dear Joe:

In response to your recent request for information concerning odor control and burn-out of gases in the furnace system to be installed at McKay Bay, we are submitting the following:



Zone 1 - Furnace, Rotary Kiln and By-Pass Ducting
Average Temperature 1750°F
Residence Time 2.7 seconds



Zone 2 - Afterburner
Average Temperature 1750°F
Residence Time 0.95 seconds



Zone 3 - Boiler - 1st Pass
Average Temperature 1300°F
Residence Time 3.89 seconds

Mr. Joe Murdoch
November 5, 1982
Page 2

It has been Volund's experience that gas retention for 1 second at or above 1300°F will eliminate any detectable odor in the flue gases.

I hope this information is helpful in your discussions with the appropriate officials.

Very truly yours,

A handwritten signature in cursive script that reads "P. Ware". The signature is written in dark ink and is positioned above the typed name.

Peter J. Ware
Director
Technical Development

PJW:mat

Best Available Copy

Rubbermaid

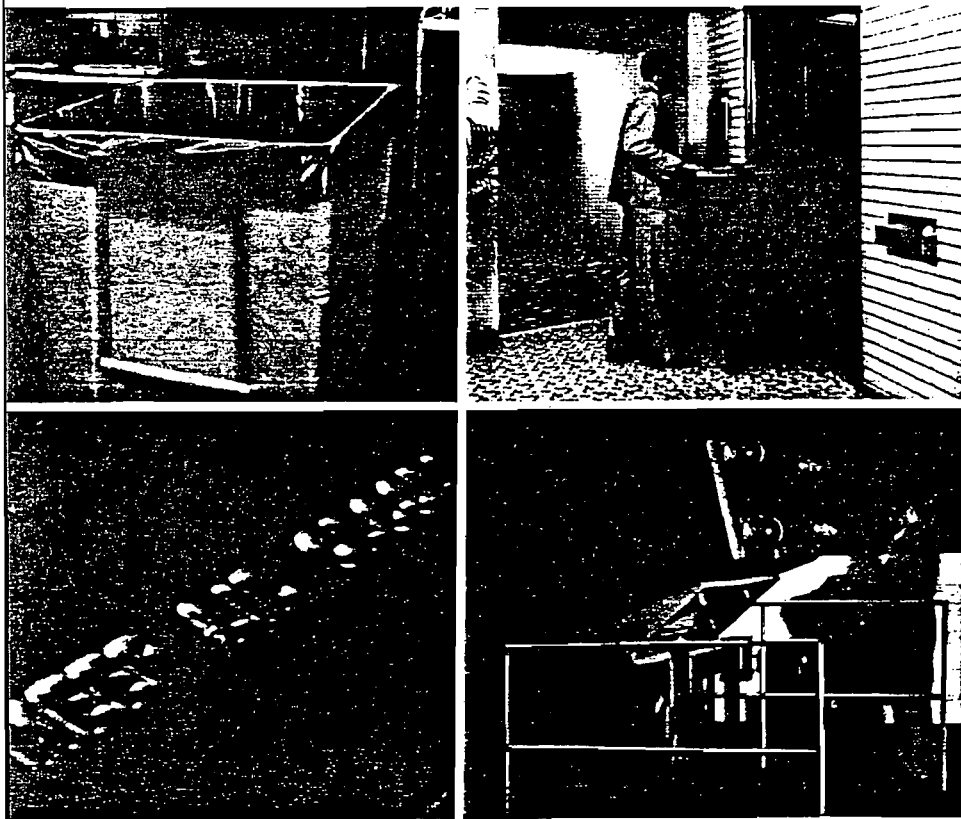
in/terior service Tote



A safety first system for collecting and automatically dumping all types of building trash.

Building trash can now be collected, transported and automatically dumped in stationary compactors more efficiently; with greatly reduced risk of employee injury.

Collecting, transporting and dumping the wide variety of trash generated within a typical commercial building or plant presents many problems - but, a Rubbermaid in/terior service Toter system can solve most of them! For example:



1. Safer trash handling and dumping.

Back strain and fall related injuries are the two most obvious dangers of handling and dumping trash - Rubbermaid in/Toter systems feature automatic, remote-controlled dumpers to help avoid these potential employee hazards. The special electric - hydraulic dumping units eliminate the need to lift or hand-dump trash into compactors or other transfer containers. The employee simply hooks the in/Toter then actuates the dumper from a safe, remote location. Along with reducing injury risk - the system can also save on insurance costs, workmen's compensation settlements, plus absenteeism. And, of course, improved working conditions mean better employee morale!

2. Color-coding and signage for better management...and looks!

Each department, floor section, or 'special activity', can have its own color-coded and/or custom-imprinted carts. This provides better inventory control and color harmony to your building decor.

3. Easier on your building!

The smooth, rounded edges. The less abrasive material. The more controlled - maneuverability...and the compact, trim-line design of both carts cuts down on damage to interior walls, floors and doors.

4. A versatile one-source answer!

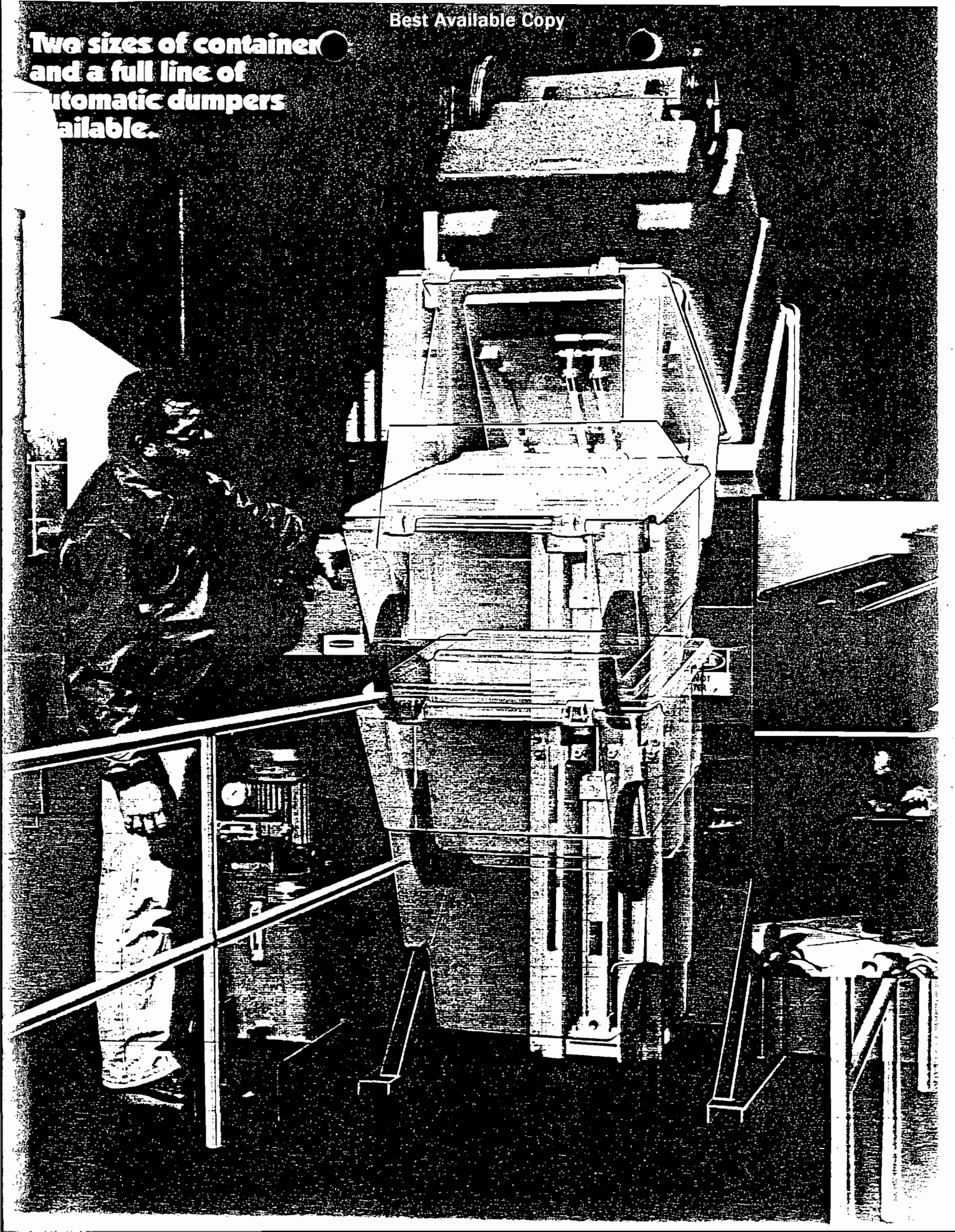
Rubbermaid in/Toters can handle all types of normal building refuse including wet trash. Our container walls are virtually impervious and special liners are available.

5. Efficiency and cost-control

Easy-rolling, maneuverable Rubbermaid in/Toters come in two hi-capacity sizes to help achieve faster trash collection. This can significantly reduce manpower costs!

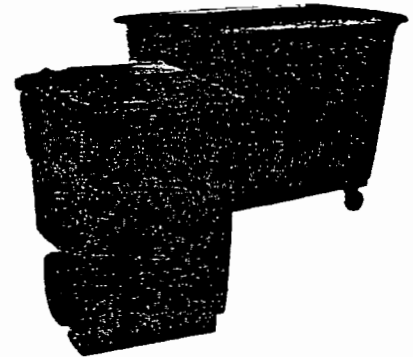
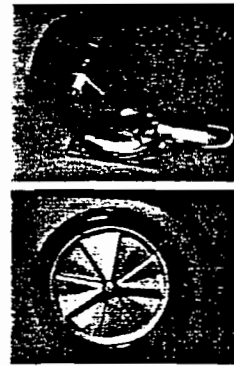
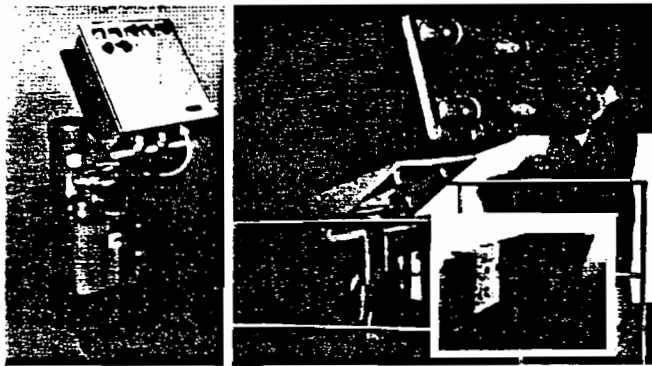
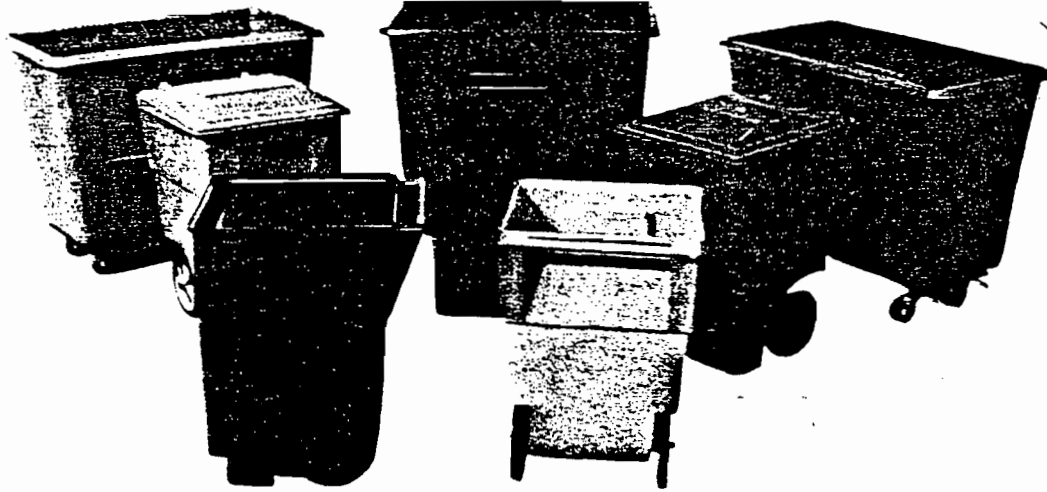
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Two sizes of container
and a full line of
automatic dumpers
available.



Best Available Copy

Traditional Rubbermaid Product Integrity.



Hydraulic Dumper SPECIFICATIONS

Electro-hydraulic dumpers available for most dock level and ground level stationary compactors. **NOTE:** 1.0 cu. yd. Dumper will dump both sizes of in/Toters.

POWER:	3ph./60cy./220-440V	1/2 cu. yd.	1.0 cu. yd.
	Totally enclosed, fan-cooled motor. All electrical components are UL listed.	2 hp	3 hp
HYDRAULICS:	1300psi; Built-in fluid filter and flow control valves. Meets all J.I.C. and I.S.O. Standards.	2 gpm 5 gal. reservoir	3 gpm 10 gal. reservoir

CONTROLS: Key - operated ON/OFF with manual directional "deadman" valve.

INSTALLATION: Dumpers are specified and custom -installed by exclusive in/Toter™ distributors, to work with most stationary compactor models.

This equipment conforms to all applicable ANSI Z245.1-1975 Safety Standards. Pictures in this brochure are illustrative only. Products must be installed in conformity with ANSI Z245.1 as well as any applicable codes and regulations. Products must be used with safe practices and in accordance with said regulations and standards.

in/Toter™ SPECIFICATIONS

	1/2 cu. yd.	1.0 cu. yd.
DIMENSIONS:	32"Lx29"Wx41 1/2"H	55 1/2"Lx33 1/2"Wx44 1/2"H
WEIGHT:	37 lbs.	98 lbs.
In/Toter Lid	5 lbs.	11 lbs.
CAPACITY:	200 lbs., 11 cu. ft.	500 lbs., 1.0 cu. yd.
WHEELS:	2-12"x1.75" Semi-pneumatic	2-5" Swivel Casters 2-5" Locking Casters
MATERIAL:	Specially compounded high density polyethylene	
COLORS:	Brown, Blue, Red, Orange, Yellow	
IMPRINTING:	Permanent hot stamped imprinting optional. Examples: "SOILED LINEN", "KITCHEN"	
LINER:	Gray or red poly-bag liners available.	

Specifications subject to change without notice.

A safety-engineered system manufactured and distributed exclusively by:

Paul Reilly Company of Illinois, Inc.
1319 Howard St.
Elk Grove Village, IL 60007
(312) 364-1960



RUBBERMAID APPLIED PRODUCTS INC.

STATE OF FLORIDA



DEPARTMENT OF

Health & Rehabilitative Services

Bob Graham, Governor

1317 WINEWOOD BOULEVARD

TALLAHASSEE, FLORIDA 32301

PDHEC (904/488-2905, SC278-2905)

January 25, 1982
INFORMATION

SUBJECT: Guidelines for Hospitals, Renal Dialysis Centers,
Nursing Homes and Laboratories for the Classification
and Handling of Disposable Infectious Waste

TO: District Administrators
Attention: Health Program Supervisors
County Health Unit Directors
All Licensed Hospitals

Attached are guidelines (minimum standards) for hospitals, renal dialysis centers, nursing homes, and laboratories for the classification and handling of disposable infectious waste. These guidelines were developed following a meeting of representatives from the Department of Health and Rehabilitative Services, Department of Environmental Regulation, Centers for Disease Control, County Health Units, Hospital Infection Control Specialists, and Waste Disposal Industry (June 29, 1981 - list of attendees available upon request). The guidelines in draft form were distributed to all meeting attendees for comment.

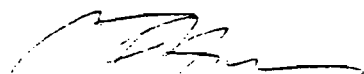
These guidelines are intended to aid hospitals, renal dialysis centers, nursing homes, and laboratories in classifying and handling disposable infectious waste in preparation for collection and ultimate disposal in the environment. They are not intended to be all encompassing recommendations for handling human tissues/waste specimens (or materials in contact with such specimens) within hospitals. Hospitals and other institutions should develop additional internal policies for the protection of employees from contact with potentially infectious material and for the proper sterilization of reusable items. We feel, and the Department of Environmental Regulation (DER) concurs, that these guidelines are not in conflict with DER Administrative Code, Chapter 17-7.02, Definition of Infectious Waste, since that definition uses permissive language in determining what waste materials are infectious waste, i.e. "...waste which may consist of...". Once materials are classified as infectious, they shall be disposed of in accordance with DER Administrative Code, Chapter 17-7.04. It is, therefore, obvious that the enforcement of these guidelines (or when they are incorporated

into F.A.C.) will have to take place at the source (hospital, etc.) and will not be enforceable by examining materials in landfills (unless they are in an infectious waste bag).

We hope that any local ordinances pertaining to this subject will be based on these guidelines. We plan to incorporate them, in principle, into the Florida Administrative Code pertaining to hospitals (Chapter 10D-28) and nursing homes (Chapter 10D-29) and therefore, additional comments are appreciated.



ROBERT A. GUNN, M.D., M.P.H.
State Epidemiologist
Epidemiology/Communicable Disease
Health Program Office



JAMES T. HOWELL, M.D., M.P.H.
Acting Staff Director
Health Program Office

RAG/JTH/sb

Attachment

cc: All Meeting Attendees
OPHLS (Hr. Hartwig) (for distribution)
OPLC (Ms. Beamer) (for distribution to nursing homes)
PDPA (Ms. Selesky)
Dr. Joel Ehrenkranz
Mr. Spero Moutsatsos, Florida Endstage Renal
Disease Network (for distribution)
Mr. Robert J. Constantine, Director
Mental Health Program Office (for distribution)
OPIRM (for distribution)



STATE OF FLORIDA

DEPARTMENT OF

Health & Rehabilitative Services

Bob Graham, Governor

1317 WINEWOOD BOULEVARD

TALLAHASSEE, FLORIDA 32301

February 1, 1982

GUIDELINES (MINIMUM STANDARDS) FOR HOSPITALS, RENAL DIALYSIS CENTERS, NURSING HOMES, AND LABORATORIES FOR THE CLASSIFICATION AND HANDLING OF DISPOSABLE "INFECTIOUS WASTE"

A. Definitions - for the purposes of these guidelines the following definitions are used:

1. Solid Waste - All solid material emanating from patient care which includes, but is not limited to, the following disposables: linens, gowns, intravenous (I.V.) material, catheters, syringes, needles, clinical laboratory specimen containers, tubes, drainage systems, renal dialyzers and accessories, and other disposable items which may be contaminated with urine, feces, blood, secretions or other bodily fluids.
2. Liquid Waste - All material emanating from patient care that may be and is routinely placed into the sewage system, which includes, but is not limited to, urine, feces, blood, secretions, drainage fluids and other bodily fluids.

B. Infectious Waste

The following materials are classified as infectious waste:

1. Patients Under Isolation Orders - All solid wastes from patients under strict or respiratory isolation as defined in Isolation Techniques for Use in Hospitals, Second Edition (or more recent edition), 1975, U.S. Department of Health and Human Services, Centers for Disease Control.
2. Patients Under Precautions Orders - All solid wastes from patients pertaining to the maintenance of enteric, wound/skin, discharge (secretion and excretion) and blood precautions as defined in Isolation Techniques for Use in Hospitals, Second Edition (or more recent edition), 1975, U.S. Department of Health and Human Services, Centers for Disease Control.

3. All unautoclaved microbiologic waste derived from processing clinical specimens which includes, but is not limited to, all cultures and disposable items that may be contaminated with culture organisms.
4. All solid tissue specimens.
5. Class IV Viral Agents - Waste from patients (or waste from laboratory experiments) infected with Centers for Disease Control (CDC) Class IV viral agents (Appendix A) shall include all solid waste in addition to all liquid waste which may contain the infecting agent.

C. Needles/Sharps ("sharps")

All material with sharp or jagged edges ("sharps"), which includes, but is not limited to, needles, syringes, scalpels, lancets, and pipettes shall be placed in rigid disposable containers. They may be disposed of in regular waste unless classified as infectious waste as per Section B; however, if the regular waste disposal system uses a trash compacter and the integrity of the container is in doubt, such container should be handled as infectious waste. It is also recommended that needles and syringes not be dismantled or destroyed after use but that they be placed intact directly into a rigid container.

D. Handling

Infectious waste shall be placed in double impervious plastic bags (color-coded - usually red) and each single bag shall be at least two mills in thickness. A bag, when full, should not exceed 25 pounds. All bags should be securely closed and a tag, which reads "INFECTIOUS WASTE" and identifies the hospital, dialysis center, laboratory, or nursing home from which the waste is being removed, shall be attached to the bag in a conspicuous manner. As an alternative to tagging, the information which is required to be placed on the tags may be printed in a conspicuous manner on the bag itself.

E. Storage and Removal

Bags of infectious waste shall be transported and stored in receptacles which are conspicuously marked "INFECTIOUS WASTE". Infectious waste shall be held for pick-up in specially-marked non-metal containers separate from regular waste and shall be secured from unauthorized persons, birds, and animals and, if possible, rain/storm water. Infectious waste bags should not be removed by mechanical or compaction equipment. Broken or leaking

bags shall not be transported from the originating site until re-bagged.

F. Disposal

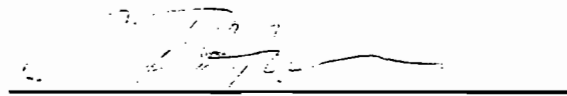
Infectious waste must be disposed of according to the Department of Environmental Regulation rule 17-7.04(6) which states "infectious waste shall be properly incinerated or processed by an alternate method which has been approved by the Department (DER). No untreated infectious waste shall be deposited in any sanitary landfill."



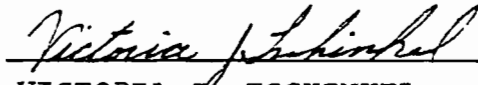
ROBERT A. GUNN, M.D., M.P.H.
State Epidemiologist
Epidemiology/Communicable Disease
Health Program Office
Department of Health and
Rehabilitative Services



RODNEY S. DeHan, Ph.D.
Administrator
Groundwater Section
Department of Environmental
Regulation



JAMES T. HOWELL, M.D., M.P.H.
Acting Staff Director
Health Program Office
Department of Health and
Rehabilitative Services



VICTORIA J. TSCHINKEL
Secretary
Department of Environmental
Regulation

Attachment

APPENDIX A - CENTERS FOR DISEASE CONTROL (CDC)
CLASSIFICATION OF ETIOLOGIC AGENTS

Class 4

Agents that require the most stringent conditions for their containment because they are extremely hazardous to laboratory personnel or may cause serious epidemic disease. This class includes Class 3 agents from outside the United States when they are employed in entomological experiments or when other entomological experiments are conducted in the same laboratory area.

Alastrun, Smallpox, Monkey pox and Whitepox, when used for transmission or animal inoculation experiments

Hemorrhagic fever agents, including Critmean hemorrhagic fever (Congo), Junin, and Machupo viruses, and others as yet undefined

Herpesvirus simiae (Monkey B virus)

Lassa virus

Marbug Virus

Tick-borne encephalitis virus complex, including Russian spring-summer encephalitis, Kyasanur forest disease. Omsk hemorrhagic fever, and Central European encephalitis viruses.

Venezuelan equine encephalitis virus, epidemic strains, when used for transmission or animal inoculation experiments

Yellow fever virus - wild, when used for transmission or animal inoculation experiments



CITY OF TAMPA

Bob Martinez, Mayor

MCKAY BAY REFUSE-TO-ENERGY PROJECT

December 29, 1982

DER
JAN 3 1983
BAQM

Mr. Clair Fancy
Department of Environmental Regulation
Bureau of Air Quality
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Permit #PSD-FL-086, AC29-47277

Dear Mr. Fancy:

As you are aware, the City of Tampa has received permits from D.E.R. for construction of the McKay Bay Refuse-to-Energy Facility. The Facility is designed to burn solid waste from the City of Tampa and to simultaneously generate electricity. The City has previously requested to modify its permits to Construct an Air Pollution Source to allow burning of infectious waste in the Facility (letter of November 9, 1982). Recently, the City received a request from a Tampa Port Authority group to provide facilities for disposal of oil recovered from oil spills occurring at the Port of Tampa.

Oil would be delivered to the Facility by tanker truck or in polyethylene pads packed in fiber drums. The Facility would accept no more than 15,000 gallons per day from tanker trucks which would spray the oil onto the garbage in the pit. The Facility would accept up to 10 tons per day of fiber drums which would be placed directly into the combustion train. Disposal will only be available for oil spilled at the Port of Tampa. Such spills have resulted in an average of approximately 10,000 gallons of oil being recovered each year. The only major spill in the Port of Tampa released approximately 30,000 gallons of oil in 1979. No additional air emissions are expected from the burning of recovered oil.

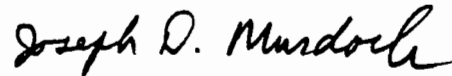
The City therefore requests to have its permits to Construct an Air Pollution Source (PSD FL-086, AC29-47277)

Mr. Clair Fancy
Page 2
December 29, 1982

modified to allow burning of the above-mentioned quantities of recovered oil. Additionally, we request modification of these permits to allow burning of infectious waste as described in our letter of November 9, 1982.

If you have any questions concerning these requests, please contact my office. Thank you.

Very truly yours,



Joseph D. Murdoch
Resource Recovery
Management Analyst

JDM/dw

cc Rick Garrity
John Egan

COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
PAM IORIO
SYLVIA KIMBELL
JAN KAMINIS PLATT
JAMES D. SELVEY
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION
TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION
TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

ENVIRONMENTAL PROTECTION COMMISSION
of Hillsborough County

FAX Transmittal Sheet

DATE: 9/27/92

TO: BRUCE MITCHELL

FAX Phone: 904-922-6979 Voice Phone: _____

TOTAL NUMBER OF PAGES INCLUDING THIS COVER PAGE: 13

EPC FAX Transmission Line: (813) 272-7144 For retransmission or any FAX problems, call: (813) 272-7104

FROM: STERLING WOODARD (circle applicable phone number and organization below)

- | | | |
|--------------------|-------------------------|-----------------------------|
| (813) 272-5530 | (813) 272-5788 | (813) 272-7104 |
| Air Division | Waste Management | Ecosystems Management |
| - Special Programs | - UST Clean-Up | - Environmental Engineering |
| - Air Engineering | - Solid/Hazardous Waste | - Environmental Assessment |
| | - UST Compliance | - Compliance & Enforcement |

SPECIAL INSTRUCTIONS: Copy of permits (original), BACT, LAER. year 1983 Issued April 23, 1982
Amendments: NOV 7, 1986: Construction of fly ash silo (addition of specific conditions 9-1 through 14
May 20, 1983: Change of specific condition No 2
to allow the burning of infectious waste and
waste oil collected from spills cleaned up by the Port
Authority

(File:work\mfa\FAXTrans.frm)

COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
PAM IORIO
SYLVIA KIMBELL
JAN KAMINIS PLATT
JAMES D. SELVEY
ED TURANCHIK

FAX (813) 272-5157



ROGER P. STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

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TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION
TELEPHONE (813) 272-7104

ENVIRONMENTAL PROTECTION COMMISSION
of Hillsborough County

FAX Transmittal Sheet

DATE: 9/22/92

TO: BRUCE MITCHELL

FAX Phone: 904-922-6979 Voice Phone: _____

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FROM: STERLING WOODARD (circle applicable phone number and organization below)

(813) 272-5530

Air Division

- Special Programs

- Air Engineering

(813) 272-5788

Waste Management

- UST Clean-Up

- Solid/Hazardous Waste

- UST Compliance

(813) 272-7104

Ecosystems Management

- Environmental Engineering

- Environmental Assessment

RECEIVED Compliance & Enforcement

SPECIAL INSTRUCTIONS: _____

SEP 23 1992

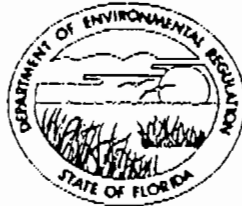
Division of Air
Resources Management

VICTOR

RECEIVED

NOV 17 1986

M.L.L.A.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATIONTWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241BOB GRAHAM
GOVERNORVICTORIA J. TSCHINKEL
SECRETARY

November 7, 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Nancy McCann
 Urban Environmental Coordinator
 Office of Environmental Coordination
 City Hall Plaza, 5N
 Tampa, Florida 33602

Dear Ms. McCann:

Re: Amendment to Construction Permit AC 29-47277

The department is in receipt of your request to amend the above referenced state construction permit to reflect the "as built" construction of the facility. The amendment to the permit allows for the construction of a flyash storage silo. Particulate matter emissions will be controlled by use of a baghouse filter and are in accordance with the department's determination of Lowest Achievable Emission Rate for particulate matter. The department is in agreement with the request and the following shall be added or changed:

Expiration Date:

From: April 30, 1986
 To: December 31, 1986

Specific Conditions:

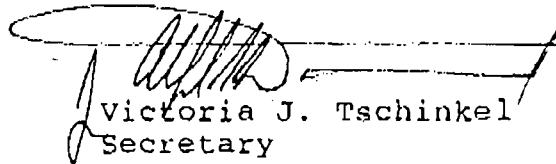
9. Particulate matter emissions from the flyash storage silo shall not exceed 0.025 grains per dry standard cubic foot or 0.36 pound per hour based on a maximum flow rate of 2109 acfm.
10. Visible emissions from the flyash storage silo shall not exceed 5% opacity. Compliance with this limit shall be demonstrated by DER Method 9 in accordance with the requirements of section 17-2.700, FAC.
11. The permittee shall provide HCEPC and SWFDER at least 30 days advanced written notice of the startup date of the flyash storage silo.

Ms. Nancy McCann
Page Two
November 7, 1986

12. The visible emissions tests for the flyash storage silo must be accomplished within 5 days of startup of the silo.
13. Should HCEPC or the Department have reason to believe the particulate emission standard is not being met, HCEPC or the Department may require that compliance with the particulate emission standards be demonstrated by testing in accordance with EPA Methods 1, 2, 3, 4, and 5.
14. Within 45 days of initial compliance testing of the source, test results along with 4 copies of a completed Certificate of Completion of Construction form shall be submitted to the HCEPC.

This letter must be attached to your construction permit, AC 29-47277, and shall become a part of that permit.

Sincerely,



Victoria J. Tschinkel
Secretary

VJT/ks

cc: Bill Thomas, SW District
Victor San Augustin, HCEPC ✓

File 4 h(2)

7.026

Final Determination

RECEIVED

MAY 26 1983

H.C.E.P.C.

Amendment to
McKay Bay Refuse-To-Energy Project
Hillsborough County

Permit Number
AC 29-47277

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

May 20, 1983

FINAL DETERMINATION

The City of Tampa's request to amend the construction permit of its McKay Bay Refuse-To-Energy Project to allow the incineration of infectious waste and waste oil recovered from oil spills has been reviewed by the Bureau of Air Quality Management. The department's Intent to Issue the permit was published in the Tampa Tribune on April 11, 1983.

Copies of the preliminary determination and technical review were available for public inspection at the Hillsborough County Environmental Protection Commission Office, the DER Southwest District Office, and the Bureau of Air Quality Management office.

No comments were received regarding this permit amendment. Therefore, it is requested that the permit conditions be issued as indicated in the preliminary determination.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATIONTWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241BOB GRAHAM
GOVERNORVICTORIA J. TSCHINKEL
SECRETARY

May 20, 1983

Mr. Dale H. Twachtmann
City of Tampa
McKay Bay Refuse-To-Energy Project
City Hall Plaza, 5N
Tampa, Florida 33602

Re: Modification of Conditions, Permit No. AC 29-47277.

Dear Mr. Twachtmann:

We are in receipt of requests for modifications of the permit conditions. The specific conditions are changed as follows:

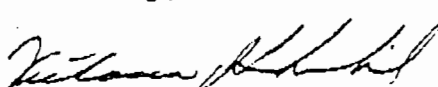
Specific Condition 2

From: Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

To: Municipal waste and infectious waste shall be burned in the facility. Waste oil collected from spills cleaned up by the Port Authority not exceeding 10,000 gallons per day from tanker trucks or 10 tons per day of fiber drums shall also be burned. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,


Victoria J. Tschinkel
Secretary

VJT/ks

Issued this 20 day of May, 1983

7-628



TWIN TOWERS OFFICE BUILDING
2800 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301

BOB GRAHAM
GOVERNOR
Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

April 23, 1982

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

RECEIVED
APR 28 1982
H.C.E.P.C.

Dale H. Twachtmann
City of Tampa
306 East Jackson Street
Tampa, Florida 33602

Dear Mr. Twachtmann:

Enclosed is Permit Number AC 29-47277 dated April 23, 1982
to City of Tampa
Issued pursuant to Section 403, Florida Statutes.

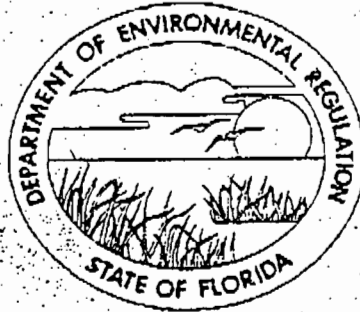
Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,

C. H. Fancy
C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

CHF/pa

cc: Dan Williams, FDER, Southwest District
Hooshang Boostani, Hillsborough County Environmental
Protection Commission
Joe Murdoch, City of Tampa



STATE OF FLORIDA
 DEPARTMENT OF
 ENVIRONMENTAL REGULATION

CONSTRUCTION
 PERMIT

NO. AC 29- 47277

CITY OF TAMPA
 MCKAY BAY REFUSE-TO-ENERGY
 FACILITY NO. 1

DATE OF ISSUANCE

April 23, 1982

DATE OF EXPIRATION

DECEMBER 31, 1984

Victoria Tschinkel

VICTORIA TSCHINKEL
 SECRETARY

Final Determination

McKay Bay Refuse-to-Energy Project
Hillsborough County

Permit Number:

AC 29-47277

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

April 21, 1982

The proposed air pollution construction application from the City of Tampa to build a resource recovery facility has been reviewed by the Bureau. The Department's Intent to Issue the construction permit was published in the Tampa Times on March 22, 1982. Copies of the preliminary determination were available for public inspection at the Hillsborough County Environmental Protection Commission Office, at the Department's Southwest District Office and at the Bureau of Air Quality Management.

Only one letter of comment was received during the thirty day public notice period. The City of Tampa has requested that another specific condition be added that would allow a procedure for adjusting the emission limitations if the estimated emissions were less than the actual emissions. Since this condition is similar to a general condition in the federal permit and follows the Department's policy, the Bureau agrees with the recommendation.

Therefore, it is recommended that the air construction permit be issued with the above mentioned addition.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICANT: City of Tampa
306 East Jackson Street
Tampa, Florida 33602

PERMIT/CERTIFICATION
NO. AC 29-47277

COUNTY Hillsborough

PROJECT: McKay Bay
Refuse-to-Energy
Facility No. 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2
and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to
perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and
made a part hereof and specifically described as follows:

Rehabilitation of the three combustion chambers at the Tampa Municipal
Incinerator and the construction of a fourth 250 TPD combustion chamber
and the modification of the facility to a resource recovery facility.

Attachments:

1. McKay Bay Refuse-to-Energy Project, Application to Construct an
Air Pollution Source, July, 1981.
2. McKay Bay Refuse-to-Energy Project, Application to Construct an Air
Pollution Source, October, 1981.
3. Letter of Richard Garrity to Steve Smallwood, December 10, 1981,
concerning effort to obtain emission offsets.
4. Letter of Richard Garrity to Clair Fancy, February 18, 1982, requesting
hourly emission rate changes.

PERMIT NO.: AC 29-47277
 APPLICANT: City of Tampa

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.
3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.
4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.
5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.
6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.
7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.
8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.
9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.
10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.
11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.
12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
13. This permit also constitutes:
 - Determination of Best Available Control Technology (BACT)
 - Determination of Prevention of Significant Deterioration (PSD)
 - Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 29-47277
 APPLICANT: City of Tampa

SPECIFIC CONDITIONS:

1. The maximum allowable emissions from the resource recovery facility No. 1 shall be:

Pollutant	Emission Limitation
Particulate	0.025 gr/dscf @12% CO ₂ 27.9 lb/hr
Sulfur Dioxide	170.0 lb/hr
Nitrogen Oxides	300.0 lb/hr
VOC	9.0 lb/hr

2. Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.
3. Hours of operation for the facility shall be 24 hours per day, 7 days per week, 52 weeks per year.
4. An operation and maintenance plan as contained in 17-2.13(7), FAC, shall be submitted with the operating permit applications and be made part of the operating permit.
5. Compliance testing for all criteria shall be conducted in accordance with the methods contained in 40 CFR 60 and 61. A source testing plan shall be submitted to the Department for approval 90 days prior to testing. The Department shall be notified of compliance testing at least 30 days prior to the testing.
6. During the particulate compliance testing, a visible emission standard shall be established by 40 CFR 60, Appendix A, Method 9, as a surrogate compliance method as contained in 17-2.23(3), FAC, and be made a condition of the operating permit.
7. Prior to ninety days before the expiration of this permit, a complete application for an operating permit shall be submitted to the DER Southwest District Office or its designee.

BEST AVAILABLE COPY

PERMIT NO.: AC 29-47277
APPLICANT: City of Tampa

- 8. The above stated emission limitations are based upon the best estimates of the permittee. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, the permitting authority may then institute procedures to amend the permit conditions.

Expiration Date: December 31, 1984

Issued this 21 day of April 1982

 Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

[Handwritten Signature]
Signature

Best Available Control Technology (BACT) Determination

Amendment

Hillsborough County

The City of Tampa proposes to construct a facility to incinerate municipal solid waste and use the resulting heat energy to produce electricity as a saleable by-product. The facility is to be located at the site of a previous incinerator installation which has been inoperative since December 1979. This venture, known as the McKay Bay Refuse-to-Energy project, is tentatively a two phase plan.

Phase one is the renovation and conversion of the three existing mass burn combustion furnaces into a state-of-the-art resource recovery system. A fourth combustion furnace will be installed plus waste heat boilers, electrostatic precipitators and a condensing steam turbine electric generator. When phase one is completed the facility will have the capability to burn approximately 300,000 tons per year of solid waste and generate 21 megawatts of electricity. This BACT determination applies to phase one of this project.

Phase two will be the installation of two new mass burn combustion furnaces, with heat recovery systems, and will be located adjacent to the renovated system. The new system will be capable of processing 1,000 tons per day of municipal solid waste and, in addition, to producing electricity will allow the recovery of recyclable materials, such as ferrous metals and aluminum. A BACT determination, if applicable, will be made when the plans for phase two of the project are finalized.

The McKay Bay Refuse-to-Energy project, when completed, will be capable of processing 2,000 tons per day of solid waste. The facility is scheduled to operate continuously with a 20 percent downtime allowance for maintenance.

Applicant's estimated net increase in air emissions (tons/year):

Pollutant	Phase I
Particulates	133
SO ₂	745
NO _x	1314
CO	75
HC	39

-3-

had to consider the following:

- 1) Resource recovery facilities have a high potential for severely and adversely affecting air quality. Pollutants of concern are SO_2 , NO_x , particulates, HC, HCL and HF acid gases.
- 2) The thermal destruction of municipal waste is a recognized method of disposal, and A. reduces landfill area requirements; B. eliminates a breeding ground for rodents; C. reduces possibility of ground water contamination; D. allows for the recovery of various metals for recycle.
- 3) Air pollution control technology is currently commercially available and capable of achieving the levels of control necessary to reduce most emissions from resource recovery facilities.
- 4) Calculation of sulfur dioxide emission factors for solid waste based upon the amount of SO_2 generated per million Btu of solid waste burned show the high value of the solid waste SO_2 emission to be slightly higher than the SO_2 emission factor for residual fuel oil containing 0.5 percent sulfur.
- 5) The technology for controlling NO_x emissions from resource recovery facilities is still in the experimental stage.
- 6) The land area needed for a landfill (dump) will be reduced approximately 90 percent. The residue (ash) to be disposed of in a landfill will be 15 percent of the mass but only 5 percent of the volume of waste collected and burned.

The applicant stated the SO_2 emissions would be 170 pounds per hour. This is analogous to burning oil with a sulfur content of 0.43 percent, which, in most cases, would be BACT for a boiler of this size not using a flue gas desulfurization system. Atmospheric dispersion modeling predicts no violation of the SO_2 increment at this rate of SO_2 emissions. The SO_2 emission limit of 170 pounds per hour, is therefore, determined to be BACT.

The emission of NO_x is the result of two chemical processes that occur during combustion. In one case the heat of combustion causes the oxidation of nitrogen in the air, called thermal NO_x . The second case is when the nitrogen in the fuel becomes oxidized, called fuel NO_x . Some of the factors influencing the amount of

Lowest Achievable Emission Rate (LAER) Determination
Amendment

City of Tampa

Hillsborough County

The City of Tampa proposes to construct a facility to incinerate municipal solid waste and use the resulting heat energy to produce electricity as a saleable by-product. The facility is to be located at the site of a previous incinerator installation which has been inoperative since December 1979. This venture, known as the McKay Bay Refuse-to-Energy project, is a two phase plan.

Phase one is the renovation and conversion of the three existing mass burn combustion furnaces into a state-of-the-art resource recovery system. A fourth combustion furnace will be installed plus waste heat boilers, electrostatic precipitators and a condensing steam turbine electric generator. When phase one is completed the facility will have the capability to burn approximately 300,000 tons per year of solid waste and generate 21 megawatts of electricity. This LAER determination applies to phase one of this project.

Phase two will be the installation of two new mass burn combustion furnaces, with heat recovery systems, and will be located adjacent to the renovated system. The new system will be capable of processing 1,000 tons per day of municipal solid waste and, in addition, to producing electricity will allow the recovery of recyclable materials, such as ferrous metals and aluminum. A LAER determination, if applicable, will be made when phase two plans are finalized.

The McKay Bay Refuse-to-Energy project, when completed, will be capable of processing 2,000 tons per day of solid waste. The land area needed for a landfill (dump) will be reduced approximately 90 percent. The residue (ash) to be disposed of in a landfill will be 15 percent of the mass but only 5 percent of the volume of waste collected and incinerated. The facility is scheduled to operate continuously with a 20 percent downtime allowable for maintenance.

Applicant's Estimated net increase in air emissions (tons/year):

Pollutant	Phase I
Particulates	133
SO ₂	745
NO _x	1314
CO _x	75
HC (VOC)	39

Page Three

area requirements; B. eliminates a breeding ground for rodents; C. reduces possibility of ground water contamination; D. allows for the recovery of various metals for recycle.

3. Air pollution control technology is currently commercially available and capable of achieving the levels of control necessary to reduce most emissions from resource recovery facilities.
4. The construction of a new source, or modification, in a nonattainment area shall apply to the Department for a determination of the Lowest Achievable Emission Rate (LAER) that is applicable to the affected pollutant, which, in this case, is particulate matter (17-2.17(6)(a)FAC).

The Department has determined LAER for particulate matter to be 0.025 grains/DSCF, corrected to 12% CO₂. The emission limit is deemed to be achievable based on test data from a similar operating facility located in Nashville, Tennessee.

Details of the Analysis May be Obtained by Contacting:

Edward Palagyi, LAER Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32301

Recommended By:

Steve Smallwood
for Steve Smallwood, Chief, BAQM

Date:

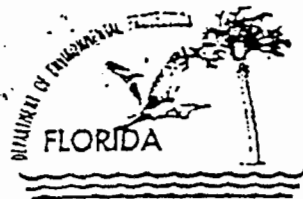
March 19, 1982

Approved:

Victoria Tschinkel
Victoria Tschinkel, Secretary

Date:

March 23, 1982



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wecherell
Secretary

PERMITTEE

Ms. Nancy McCann
Environmental Coordinator
City of Tampa
City Hall Plaza, 5N
Tampa, FL 33602

PERMIT/CERTIFICATION

GMS ID No: 4029M30071
Permit No: S029-204205
Date of Issue: 07/30/92
Expiration Date: 07/01/97
County: Hillsborough
Lat/Long: 27°56'51"N
82°25'14"W
Sec/Town/Rge: 20/29S/19E
Project: McKay Bay
Refuse-to-Energy
Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-3, 17-4, 17-701, and 17-702. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To operate a solid waste volume reduction and resource recovery facility, referred to as McKay Bay Refuse-to-Energy Facility, subject to the specific conditions attached, burning solid waste and producing electricity, near 34th Street and Clark Street, Tampa, Hillsborough County, Florida.

Replaces Permit No.: S029-116391

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.161, 403.727, or 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits; specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of rights, nor any infringement of federal, State, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

GENERAL CONDITIONS:

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- (a) Have access to and copy any records that must be kept under conditions of the permit;
- (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- (a) A description of and cause of noncompliance; and
- (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

PERMITTEE: Ms. Nancy McCann
McKay Bay Refuse-to-Energy Facility

PERMIT NO.: S029-204205

GENERAL CONDITIONS:

11. This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-730.300, Florida Administrative Code, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - (a) Determination of Best Available Control Technology (BACT)
 - (b) Determination of Prevention of Significant Deterioration (PSD)
 - (c) Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
 - (d) Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
 - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

GENERAL CONDITIONS:

(c) Records of monitoring information shall include:

1. the date, exact place, and time of sampling or measurements;
2. the person responsible for performing the sampling or measurements;
3. the dates analyses were performed;
4. the person responsible for performing the analyses;
5. the analytical techniques or methods used;
6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. This facility is classified as a solid waste volume reduction and resource recovery facility, and shall be operated in accordance with all application requirements of Chapters 17-2, 17-3, 17-4, 17-701, and 17-702, Florida Administrative Code.
2. The refuse-to-energy facility shall be operated so as to handle solid waste on a first-in, first-out basis. At no time shall any stored solid waste be allowed to remain unprocessed for more than forty-eight (48) hours unless adequate provisions are made to control flies, rodents and odors.
3. All solid waste, recovered materials or residues handled at the refuse-to-energy facility, shall be stored in a manner so as not to create a fire or safety hazard or a sanitary nuisance, and shall comply with all applicable local and state regulations. Adequate fire control facilities shall be provided. The fire protection monitoring equipment required by the local fire protection authorities shall be installed and in service by October 15, 1992. An updated fire safety survey shall be provided to verify facility compliance.
4. The operating authority shall be responsible for the control of odors and fugitive particulates arising from this operation. Such control shall prevent the creation of these nuisance conditions on adjoining property.
5. Prior to ninety days before the expiration of the Department permit, the permittee shall apply for a renewal of the permit on forms, and in a manner prescribed by the Department.
6. The ash residue from this facility shall be analyzed every three months as specified in F.A.C. Rule 17-702.570. The results shall be submitted annually to the Southwest District Office, C/O the Solid Waste Section, Tampa, Florida.
7. The facility shall be operated to comply with the August 1, 1991 Ash Residue Management Plan by HDR.
8. The permittee shall not accept hazardous waste or any hazardous substance at this site. Hazardous waste is a solid waste identified by the Department as a hazardous waste in Chapter 17-730, Florida Administrative Code. Hazardous substances are those defined in Section 403.703, Florida Statute or in any other applicable state or federal law or administrative rule.

PERMITTEE: Ms. Nancy McCann
McKay Bay Refuse-to-Energy Facility

PERMIT NO.: SC29-204205

SPECIFIC CONDITIONS:

9. This permit allows the storage and processing of waste tires in accordance with all applicable requirements of Department rules. Fire protection shall be assured by the local fire protection authorities. The operator shall keep the emergency preparedness manual at the site. Waste tires may be processed through the facility up to 3%, by weight, of the permitted capacity subject to the requirements of the DEP air rules.

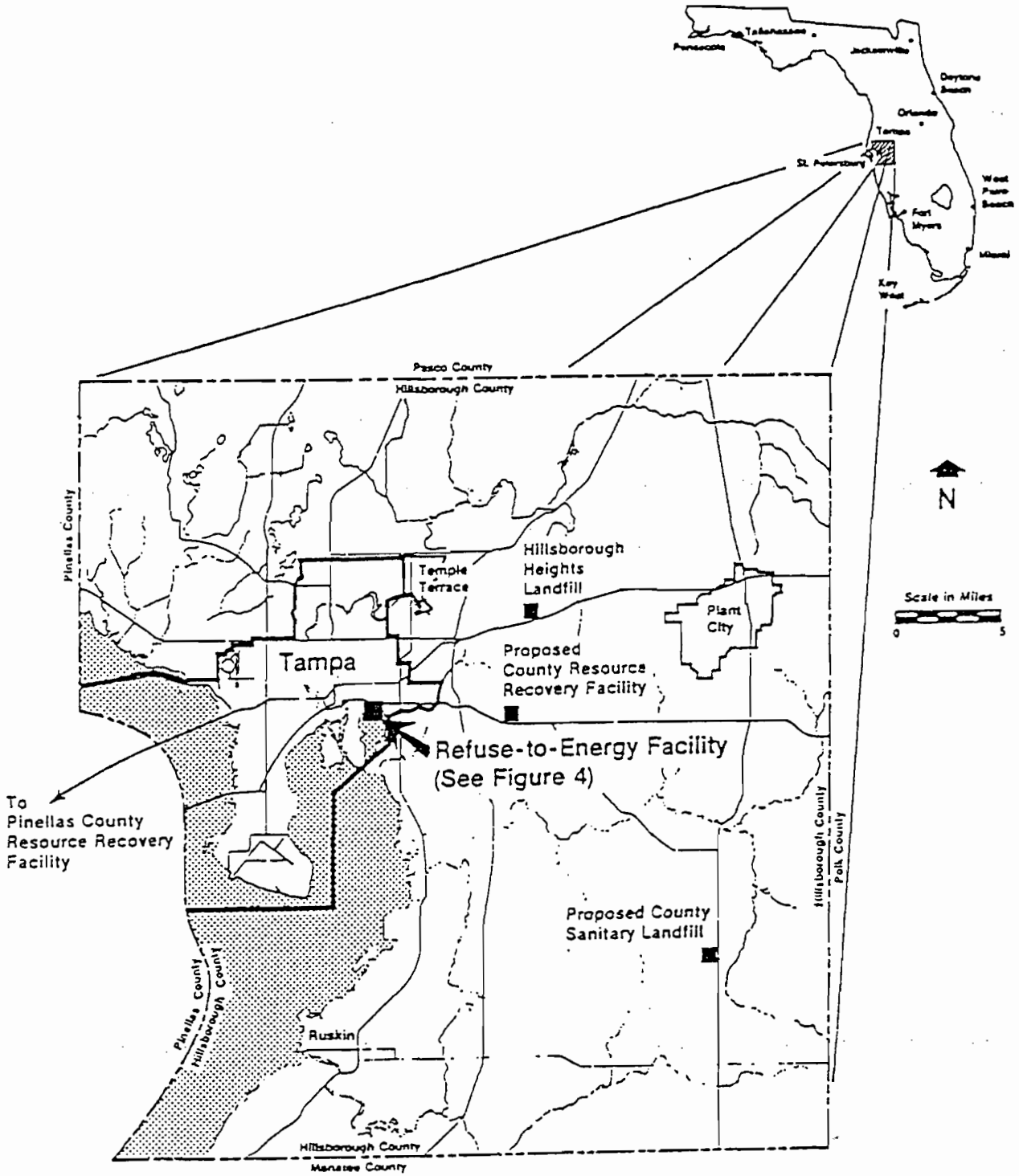
10. Where required by Chapter 471 (P.E.) or Chapter 492 (P.G.), Florida Statutes applicable portions of permit applications and supporting documents which are submitted to the Department for public record shall be signed and sealed by the professionals who prepared or approved them.

11. The permittee shall be aware of and operate under the attached "General Conditions". General Conditions are binding upon the permittee and enforceable pursuant to Chapter 403, Florida Statutes.

12. By acceptance of this Permit, the permittee certifies that he/she has read and understands the obligations imposed by the Specific and General Conditions contained herein.

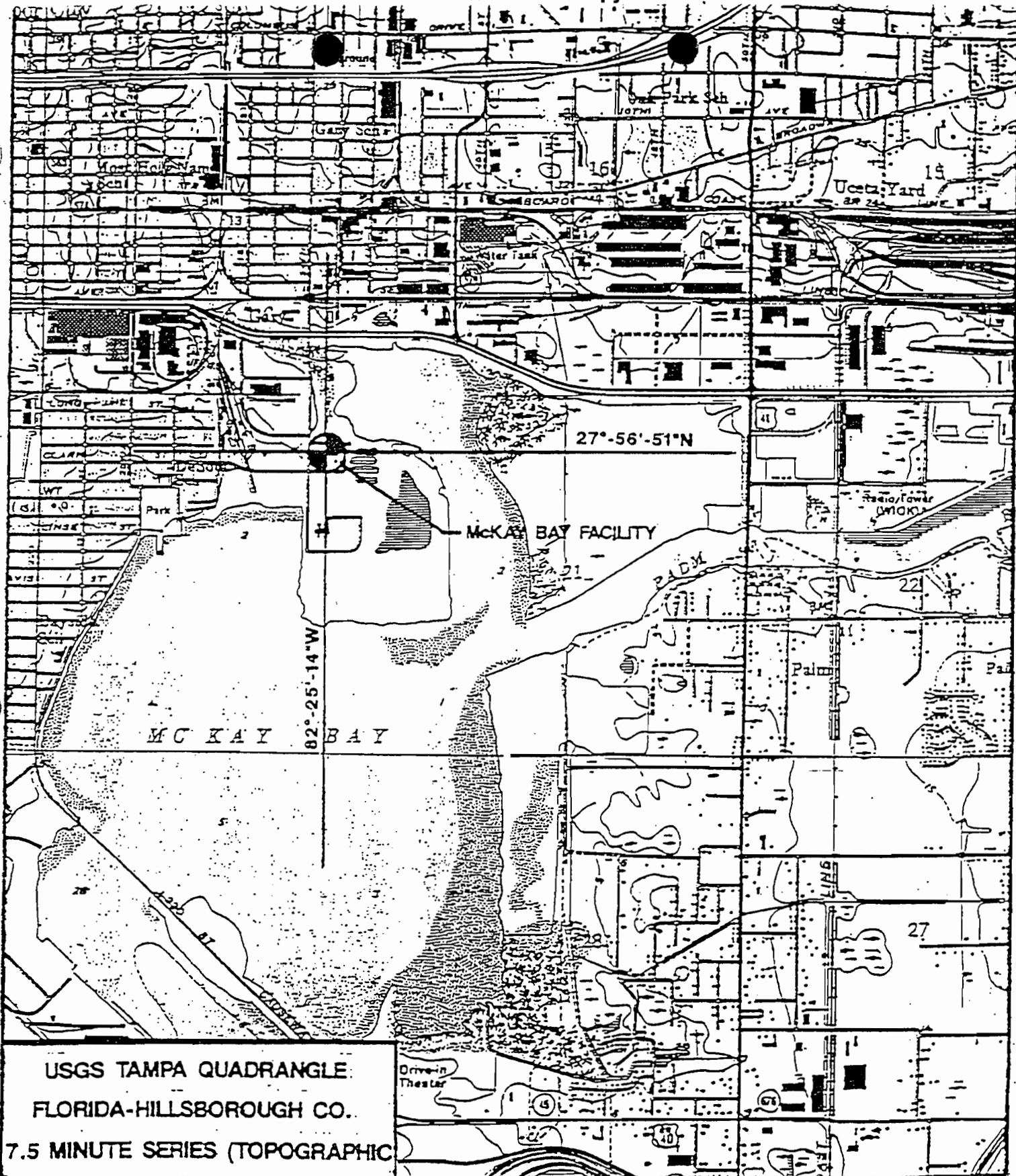
13. This permit is valid for construction and operation of the ash conditioning system submitted by the City of Tampa on August 29, 1994. Construction shall be completed by November 1, 1994. Certification of Construction Completion, Form 17-701.900(2), and Record Drawings shall be submitted within ninety (90) days after all specified construction has been completed.

New OCT - 8 1994



Site Location Map

Figure 1



USGS TAMPA QUADRANGLE
 FLORIDA-HILLSBOROUGH CO.
 7.5 MINUTE SERIES (TOPOGRAPHIC)

CITY OF TAMPA ; FLORIDA
 MCKAY BAY REFUSE TO ENERGY FACILITY
 LOCATION PLAN

Date
 JAN 95
 Figure
 L-1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUL - 2 1982

REF: 4AW-AM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Richard D. Garrity, Ph.D
Urban Environmental Coordinator
City of Tampa
306 East Jackson Street
Tampa, Florida 33602

Re: PSD-FL-086

Dear Dr. Garrity:

Review of your July and October, 1981, applications to construct a municipal incinerator-cogeneration facility in Tampa, Florida has been completed. The construction is subject to rules for the Prevention of Significant Air Quality Deterioration (PSD) contained in 40 CFR 52.21. The Florida Department of Environmental Regulation performed the preliminary determination concerning the proposed construction and published a request for public comment on March 22, 1982. Comments were submitted by the City of Tampa, the Department of Interior, and the U. S. Environmental Protection Agency and are contained and responded to in the final determination issued May 28, 1982.

Authority to construct a stationary source is hereby granted for the facility described above, subject to the conditions in the permit to construct (enclosed). This authority to construct is based solely on the requirements of 40 CFR 52.21, the federal regulations governing significant deterioration of air quality. It does not apply to NPDES or other permits issued by this agency or by other agencies. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application, will be subject to enforcement action.

This final permitting decision is subject to appeal under 40 CFR §124.19 by petitioning the Administrator of the U. S. EPA within 30 days after receipt of this letter of approval to construct. The petitioner must submit a statement of reasons for the appeal and the Administrator must decide on the petition within a reasonable time period. If the petition is denied, the permit becomes immediately effective. The petitioner may then seek judicial review.

Any questions concerning this approval may be directed to Richard S. DuBose, Chief, Air Engineering Section, Air and Waste Management Division at (404) 881-7654.

Sincerely yours,

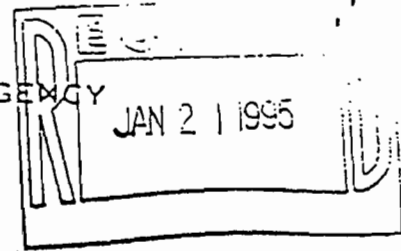
John A. Lutz, Deputy
for Charles R. Jeter
Regional Administrator

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365



PERMIT TO CONSTRUCT UNDER THE RULES FOR THE
PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY

PSD-FL-086

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 U.S.C. §7470 et seq., and the regulations promulgated thereunder at 40 C.F.R. §52.21, as amended at 45 Fed. Reg. 52676, 52735-41 (August 7, 1980),

The City of Tampa
306 East Jackson Street
Tampa, Florida 33602

is hereby authorized to construct/modify a stationary source at the following location:

Adjacent McKay Bay
South of Florida Route 60
Tampa, Florida

UTM Coordinates: 360.0 km East, 3091.9 km North

Upon completion of this authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Specific Conditions (Part I) and General Conditions (Part II).

JUL 2 1982

This permit shall become effective on _____

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time this permit shall expire and authorization to construct shall become invalid.

This authorization to construct/modify shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and Local law.

July 2, 1982

Date Signed

Deputy for
Charles R. Jeter
Regional Administrator

SPECIFIC CONDITIONS

1. The maximum allowable emissions from the resource recovery facility no. 1 shall be:

Pollutant	Emission Limitation
Sulfur dioxide	170.0 lb/hr
Nitrogen Oxides	300.0 lb/hr
Lead	3.1 lb/hr
Fluoride	6.0 lb/hr
Mercury (vaporous and particulate)	0.6 lb/hr
Beryllium 5 grams/24-hour period	0.00046 lb/hr

2. Municipal waste only shall be burned in the facility.

Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

3. Electric output for sale to Tampa Electric Company (TECO) shall not exceed 25 MW.

4. Hours of operation for the facility shall be 24 hours per day, 7 days per week, 52 weeks per year.

5. An operation and maintenance plan shall be submitted with the state operating permit application and be made part of this permit.

6. Compliance testing for all criteria and NESHAPS pollutants shall be conducted in accordance with the methods contained in 40 CFR 60 and 61. A source testing plan shall be submitted to the Department of Environmental Regulation for approval 90 days prior to testing. The Department shall be notified of compliance testing at least 30 days prior to the testing.

7. The applicant shall record and keep on file the daily charging rate of the facility and the hours of operation of the facility and shall report this information quarterly to the permitting authority.

8. The applicant shall install and operate continuous opacity monitoring equipment.

GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such action and the estimated date of demonstration of compliance as required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records for all information resulting from monitoring activities and information indicating operating parameters as specified in the specific

conditions of this permit for a minimum of two (2) years from the date of recording.

5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within ten (10) business days of such conditions:

- (a) description of noncomplying emission(s).
- (b) cause of noncompliance,
- (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
- (d) steps taken by the permittee to reduce and eliminate the noncomplying emission,

and

- (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit

may then be made by the permitting authority to reflect any necessary changes in the permit conditions.

7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.

8. The permittee shall allow representatives of the State environmental control agency or representatives of the Environmental Protection Agency, upon the presentation of credentials:

- (a) To be allowed reasonable access to the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment of monitoring methods required in this permit;
 - (d) to sample at reasonable times any emission of pollutants;
- and
- (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.

9. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to:

Chief, Air Management Branch
U. S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit shall constitute a violation of the terms and conditions of this permit.

P16 7882486

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL
(See Reverse)

SENT TO		<i>Dale H. Swachtmann</i>	
STREET AND NO.		<i>306 E. Jackson St.</i>	
P.O. STATE AND ZIP CODE		<i>Tampa, FL 33602</i>	
POSTAGE		S	
CONSULT POSTMASTER FOR FEES	CERTIFIED FEE		c
	SPECIAL DELIVERY		c
	RESTRICTED DELIVERY		c
	OPTIONAL SERVICES		
	RETURN RECEIPT SERVICE		
	SHOW TO WHOM AND DATE DELIVERED		c
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY		c
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY		c
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY		c
TOTAL POSTAGE AND FEES		S	
POSTMARK OR DATE			
<i>4/26/82</i>			

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1978

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. SENDER: Complete Items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

2. The following service is requested (check one.)

Show to whom and date delivered..... c

Show to whom, date and address of delivery..... c

RESTRICTED DELIVERY
Show to whom and date delivered..... c

RESTRICTED DELIVERY.
Show to whom, date, and address of delivery. S

(CONSULT POSTMASTER FOR FEES)

3. ARTICLE ADDRESSED TO:
Dale H. Swachtmann
City of Tampa
306 E. Jackson Street
Tampa, Florida 33602

4. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>7682496</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

C. Simpson

5. DATE OF DELIVERY

POSTMARK

APR 29 1982

6. ADDRESS (Complete only if requested)

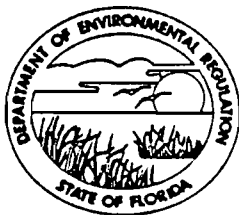
7. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

Zov

☆GPO : 1979-300-459

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

Victoria J. Tschinkel
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

April 23, 1982

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

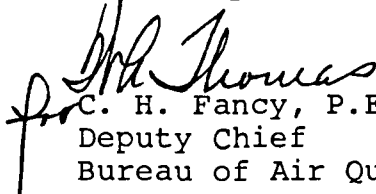
Dale H. Twachtmann
City of Tampa
306 East Jackson Street
Tampa, Florida 33602

Dear Mr. Twachtmann:

Enclosed is Permit Number AC 29-47277, dated April 23, 1982
to City of Tampa
issued pursuant to Section 403, Florida Statutes.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement actions for violation of the conditions and requirements thereof.

Sincerely,


C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

CHF/pa

cc: Dan Williams, FDER, Southwest District
Hooshang Boostani, Hillsborough County Environmental
Protection Commission
Joe Murdoch, City of Tampa

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional ()	Reply Required ()	Info. Only ()
Date Due: _____	Date Due: _____	

TO: Victoria J. Tschinkel
FROM: C. H. Fancy *Ch. Fancy*
DATE: April 21, 1982
SUBJ: Approval and Signature of Attached Air
Construction Permit Described Below

RECEIVED

APR 22 1982

Office of the Secretary

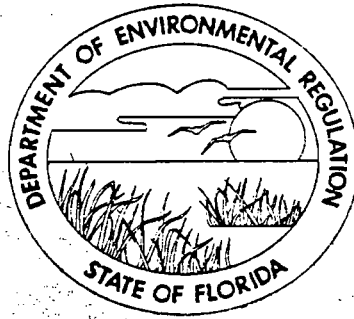
Attached please find one Air Construction Permit for which the applicant is the City of Tampa. The proposed construction is for a 1,000 ton per day resource recovery unit.

The waiver date, after which the permit would be issued by default, is April 25, 1982.

The Bureau recommends your approval and signature.

CHF/pa

Attachment



STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL REGULATION

CONSTRUCTION
PERMIT

NO. AC 29- 47277

CITY OF TAMPA
MCKAY BAY REFUSE-TO-ENERGY
FACILITY NO. 1

DATE OF ISSUANCE

April 23, 1982

DATE OF EXPIRATION

DECEMBER 31, 1984

Victoria Tschinkel

VICTORIA TSCHINKEL
SECRETARY

Final Determination

McKay Bay Refuse-to-Energy Project
Hillsborough County

Permit Number:

AC 29-47277

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

April 21, 1982

The proposed air pollution construction application from the City of Tampa to build a resource recovery facility has been reviewed by the Bureau. The Department's Intent to Issue the construction permit was published in the Tampa Times on March 22 , 1982. Copies of the preliminary determination were available for public inspection at the Hillsborough County Environmental Protection Commission Office, at the Department's Southwest District Office and at the Bureau of Air Quality Management.

Only one letter of comment was received during the thirty day public notice period. The City of Tampa has requested that another specific condition be added that would allow a procedure for adjusting the emission limitations if the estimated emissions were less than the actual emissions. Since this condition is similar to a general condition in the federal permit and follows the Department's policy, the Bureau agrees with the recommendation.

Therefore, it is recommended that the air construction permit be issued with the above mentioned addition.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

APPLICANT: City of Tampa
306 East Jackson Street
Tampa, Florida 33602

PERMIT/CERTIFICATION
NO. AC 29-47277

COUNTY Hillsborough

PROJECT: McKay Bay
Refuse-to-Energy
Facility No. 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2
and 17-4, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to
perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and
made a part hereof and specifically described as follows:

Rehabilitation of the three combustion chambers at the Tampa Municipal
Incinerator and the construction of a fourth 250 TPD combustion chamber
and the modification of the facility to a resource recovery facility.

Attachments:

1. McKay Bay Refuse-to-Energy Project, Application to Construct an
Air Pollution Source, July, 1981.
2. McKay Bay Refuse-to-Energy Project, Application to Construct an Air
Pollution Source, October, 1981.
3. Letter of Richard Garrity to Steve Smallwood, December 10, 1981,
concerning effort to obtain emission offsets.
4. Letter of Richard Garrity to Clair Fancy, February 18, 1982, requesting
hourly emission rate changes.

PERMIT NO.: AC 29-47277
APPLICANT: City of Tampa

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

PERMIT NO.: AC 29-47277
APPLICANT: City of Tampa

SPECIFIC CONDITIONS:

1. The maximum allowable emissions from the resource recovery facility No. 1 shall be:

Pollutant	Emission Limitation	
Particulate	0.025 gr/dscf @12% CO ₂	27.9 lb/hr
Sulfur Dioxide		170.0 lb/hr
Nitrogen Oxides		300.0 lb/hr
VOC		9.0 lb/hr

2. Municipal waste only shall be burned in the facility. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.
3. Hours of operation for the facility shall be 24 hours per day, 7 days per week, 52 weeks per year.
4. An operation and maintenance plan as contained in 17-2.13(7), FAC, shall be submitted with the operating permit applications and be made part of the operating permit.
5. Compliance testing for all criteria shall be conducted in accordance with the methods contained in 40 CFR 60 and 61. A source testing plan shall be submitted to the Department for approval 90 days prior to testing. The Department shall be notified of compliance testing at least 30 days prior to the testing.
6. During the particulate compliance testing, a visible emission standard shall be established by 40 CFR 60, Appendix A, Method 9, as a surrogate compliance method as contained in 17-2.23(3), FAC, and be made a condition of the operating permit.
7. Prior to ninety days before the expiration of this permit, a complete application for an operating permit shall be submitted to the DER Southwest District Office or its designee.

PERMIT NO.: AC 29-47277
APPLICANT: City of Tampa

8. The above stated emission limitations are based upon the best estimates of the permittee. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, the permitting authority may then institute procedures to amend the permit conditions.

Expiration Date: December 31, 1984

Issued this 23 day of August, 1983

 Pages Attached.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

[Handwritten Signature]
Signature

Best Available Control Technology (BACT) Determination

Amendment

Hillsborough County

The City of Tampa proposes to construct a facility to incinerate municipal solid waste and use the resulting heat energy to produce electricity as a saleable by-product. The facility is to be located at the site of a previous incinerator installation which has been inoperative since December 1979. This venture, known as the McKay Bay Refuse-to-Energy project, is tentatively a two phase plan.

Phase one is the renovation and conversion of the three existing mass burn combustion furnaces into a state-of-the-art resource recovery system. A fourth combustion furnace will be installed plus waste heat boilers, electrostatic precipitators and a condensing steam turbine electric generator. When phase one is completed the facility will have the capability to burn approximately 300,000 tons per year of solid waste and generate 21 megawatts of electricity. This BACT determination applies to phase one of this project.

Phase two will be the installation of two new mass burn combustion furnaces, with heat recovery systems, and will be located adjacent to the renovated system. The new system will be capable of processing 1,000 tons per day of municipal solid waste and, in addition, to producing electricity will allow the recovery of recyclable materials, such as ferrous metals and aluminum. A BACT determination, if applicable, will be made when the plans for phase two of the project are finalized.

The McKay Bay Refuse-to-Energy project, when completed, will be capable of processing 2,000 tons per day of solid waste. The facility is scheduled to operate continuously with a 20 percent downtime allowance for maintenance.

Applicant's estimated net increase in air emissions (tons/year):

Pollutant	Phase I
Particulates	133
SO ₂	745
NO _x	1314
CO	75
HC	39

had to consider the following:

- 1) Resource recovery facilities have a high potential for severely and adversely affecting air quality. Pollutants of concern are SO₂, NO_x, particulates, HC, HCL and HF acid gases.
- 2) The thermal destruction of municipal waste is a recognized method of disposal, and A. reduces landfill area requirements; B. eliminates a breeding ground for rodents; C. reduces possibility of ground water contamination; D. allows for the recovery of various metals for recycle.
- 3) Air pollution control technology is currently commercially available and capable of achieving the levels of control necessary to reduce most emissions from resource recovery facilities.
- 4) Calculation of sulfur dioxide emission factors for solid waste based upon the amount of SO₂ generated per million Btu of solid waste burned show the high value of the solid waste SO₂ emission to be slightly higher than the SO₂ emission factor for residual fuel oil containing 0.5 percent sulfur.
- 5) The technology for controlling NO_x emissions from resource recovery facilities is still in the experimental stage.
- 6) The land area needed for a landfill (dump) will be reduced approximately 90 percent. The residue (ash) to be disposed of in a landfill will be 15 percent of the mass but only 5 percent of the volume of waste collected and burned.

The applicant stated the SO₂ emissions would be 170 pounds per hour. This is analogous to burning oil with a sulfur content of 0.43 percent, which, in most cases, would be BACT for a boiler of this size not using a flue gas desulfurization system. Atmospheric dispersion modeling predicts no violation of the SO₂ increment at this rate of SO₂ emissions. The SO₂ emission limit of 170 pounds per hour, is therefore, determined to be BACT.

The emission of NO_x is the result of two chemical processes that occur during combustion. In one case the heat of combustion causes the oxidation of nitrogen in the air, called thermal NO_x. The second case is when the nitrogen in the fuel becomes oxidized, called fuel NO_x. Some of the factors influencing the amount of

Lowest Achievable Emission Rate (LAER) Determination
Amendment

City of Tampa

Hillsborough County

The City of Tampa proposes to construct a facility to incinerate municipal solid waste and use the resulting heat energy to produce electricity as a saleable by-product. The facility is to be located at the site of a previous incinerator installation which has been inoperative since December 1979. This venture, known as the McKay Bay Refuse-to-Energy project, is a two phase plan.

Phase one is the renovation and conversion of the three existing mass burn combustion furnaces into a state-of-the-art resource recovery system. A fourth combustion furnace will be installed plus waste heat boilers, electrostatic precipitators and a condensing steam turbine electric generator. When phase one is completed the facility will have the capability to burn approximately 300,000 tons per year of solid waste and generate 21 megawatts of electricity. This LAER determination applies to phase one of this project.

Phase two will be the installation of two new mass burn combustion furnaces, with heat recovery systems, and will be located adjacent to the renovated system. The new system will be capable of processing 1,000 tons per day of municipal solid waste and, in addition, to producing electricity will allow the recovery of recyclable materials, such as ferrous metals and aluminum. A LAER determination, if applicable, will be made when phase two plans are finalized.

The McKay Bay Refuse-to-Energy project, when completed, will be capable of processing 2,000 tons per day of solid waste. The land area needed for a landfill (dump) will be reduced approximately 90 percent. The residue (ash) to be disposed of in a landfill will be 15 percent of the mass but only 5 percent of the volume of waste collected and incinerated. The facility is scheduled to operate continuously with a 20 percent downtime allowable for maintenance.

Applicant's Estimated net increase in air emissions (tons/year):

Pollutant	Phase I
Particulates	133
SO ₂	745
NO ₂	1314
CO ^x	75
HC (VOC)	39

area requirements; B. eliminates a breeding ground for rodents; C. reduces possibility of ground water contamination; D. allows for the recovery of various metals for recycle.

3. Air pollution control technology is currently commercially available and capable of achieving the levels of control necessary to reduce most emissions from resource recovery facilities.
4. The construction of a new source, or modification, in a nonattainment area shall apply to the Department for a determination of the Lowest Achievable Emission Rate (LAER) that is applicable to the affected pollutant, which, in this case, is particulate matter (17-2.17(6)(a)FAC).

The Department has determined LAER for particulate matter to be 0.025 grains/DSCF, corrected to 12% CO₂. The emission limit is deemed to be achievable based on test data from a similar operating facility located in Nashville, Tennessee.

Details of the Analysis May be Obtained by Contacting:

Edward Palagyi, LAER Coordinator
Department of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32301

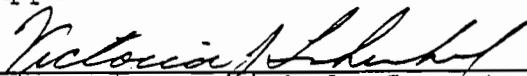
Recommended By:

for 
Steve Smallwood, Chief, BAQM

Date:

March 19, 1982

Approved:


Victoria Tschinkel, Secretary

Date:

March 23, 1982

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33637-9544

813-985-7402
SunCom - 542-8000

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

DR. RICHARD D. GARRITY
DISTRICT MANAGER

PERMITTEE:

Ms. Nancy McCann
Urban Environmental Coordinator
Office of Environmental
Coordination
City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

PERMIT/CERTIFICATION

Permit No.: A029-114760
County: Hillsborough
Expiration Date: 2-11-92
Project: McKay Bay Refuse-
to-Energy Facility
Units 1 thru 4

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of four 250 TPD municipal waste incinerators designated as Units 1, 2, 3, and 4, respectively, from west to east. Each incinerator is equipped with a 37,430 dscfm F. L. Smidth Model F300, 2-field electrostatic precipitator to control particulate emissions. Units 1 and 2 share the same stack exhaust. Units 3 and 4 share the same stack exhaust. Each stack exhaust is equipped with a certified opacity monitor.

Location: 107 North 34th St., adjacent to McKay Bay, Tampa

UTM: 17-360.0E

3091.9N

NEDS NO: 0127

Point ID:

- 01-Unit No. 1
- 02-Unit No. 2
- 03-Unit No. 3
- 04-Unit No. 4

Replaces Permit No.: AC29-47277

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

15

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate the enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.712(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by any order from the department.

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as maybe required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purposes of;

a. Having access to and copying any records that must be kept under the conditions of the permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

(a) a description of and cause of non-compliance; and

(b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

- (X) Determination of Best Available Control Technology (BACT)
- (X) Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards (Section 401. PL 92-500)
- (X) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

14. (con't)

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

SPECIFIC CONDITIONS:

1. Total maximum allowable emissions from all four process lines shall be:

<u>Pollutant</u>	<u>Emission Limitation</u>
Particulate	0.025 gr/dscf, corrected to 12% CO ₂ and 27.9 lbs./hr.
Sulfur Dioxide	170.0 lbs./hr.
Nitrogen Oxides	300.0 lbs./hr.
VOC	9.0 lbs./hr.
Lead	3.1 lbs./hr.
Fluoride	6.0 lbs./hr.
Mercury (vaporous and particulate)	0.6 lbs./hr.
Beryllium	5 grams/24 hour period and 0.00046 lbs./hr.

2. Visible emissions from each exhaust stack shall not exceed 15% opacity.

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

3. Compliance with the emission limitations of Specific Conditions Nos. 1 and 2 shall be determined using EPA Methods 1, 2, 3, 5, 6, 7, 9, 12, 13A/13B, 25A/25B, 101A, and 104 contained in 40 CFR 60, Appendix A and/or adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.

4. Test the emissions for the following pollutant(s) at intervals of 12 months from the date September 18, 1986 and submit 2 copies of test data to the Air Section of the Hillsborough County Environmental Protection Commission Office within forty-five days of such testing (Section 17-2.700(2), Florida Administrative Code (F.A.C.)). Testing of all four units for each pollutant shall be conducted in a consecutive five day period.

(X) Particulates (X) Lead
(X) Opacity*
(X) Sulfur Dioxide
(X) Nitrogen Oxides

* The visible emissions test for each unit shall be at least 60 minutes in duration and shall be conducted simultaneously with the particulate stack test. Both units which share a common stack shall be in operation during the visible emission test.

5. Test the emissions from each unit for the following pollutant(s) six months prior to the expiration date of this permit and submit 2 copies of test data to the Air Section of the Hillsborough County Environmental Protection Commission within forty five days of such testing (Section 17-2.700 (2), Florida Administrative Code (F.A.C.)). Testing of all four units for each pollutant shall be conducted within a consecutive five day period.

(X) Volatile Organic Compounds
(X) Total Fluorides
(X) Mercury (vaporous and particulate)
(X) Beryllium

6. The Hillsborough County Environmental Protection Commission shall be notified in writing 15 days prior to compliance testing.

7. Testing of emissions from each unit must be accomplished within +10% of the maximum charging rate of 10.5 TPH of municipal waste. The actual charging rate during each test run shall be specified in each test report. Failure to submit the input rates or operation at conditions which do not reflect actual operating conditions may invalidate the data (Section 403.161(1)(c), Florida Statutes).

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

SPECIFIC CONDITIONS (con't):

8. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Section 17-4.14, F.A.C.

- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Any changes in the information contained in the permit application.

Duplicate copies of all reports shall be submitted to the Hillsborough County Environmental Protection Commission.

9. Pursuant to 40 CFR 60.7, a written report of excess emissions shall be reported in a quarterly report. For purposes of this report, excess emissions shall be all air pollutant emissions in excess of the permitted levels stated in Specific Conditions 1 and 2 of this permit. Quarterly reports shall be submitted no later than 30 days from the end of each calendar quarter.

10. Four applications to renew this operating permit shall be submitted to the Hillsborough County Environmental Protection Commission 60 days prior to expiration date of this permit.

11. Pursuant to 40 CFR 60.53, Subpart E, the permittee shall record the daily charging rates and hours of operation of each unit.

12. A continuous monitoring system to determine in-stack opacity from each exhaust stack shall be calibrated, operated, and maintained in accordance with Section 17-2.710(1), F.A.C.

13. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610 (3), F.A.C.. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

14. Pursuant to Section 17-2.250(1), F.A.C., excess emissions resulting from start-up, shutdown, or malfunction of any unit shall be limited to a total of 2 hours in any 24 hour period provided best operational practices are adhered to and the duration of excess emissions are minimized. Best operational practices shall include but are not limited to :

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

SPECIFIC CONDITIONS (con't):

- B. Pollution Control Equipment Parameters:
1. Control Equipment Type: 4 Electrostatic Precipitators
 2. Model Name and No.: F. L. Smidth Model F300
 3. Design Flow Rate: 37,430 dscfm/line, 75,000 dscfm/stack
 4. Primary Voltage: 480V
 5. Primary Current: 89A
 6. Secondary Voltage: 25,000-45,000 VDC
 7. Secondary Current: 800 mA
 8. Design Collection Efficiency: 99.45%
 9. Stack Height Above Ground: 160 ft/stack
 10. Stack Diameter: 5.75 ft. each stack
 11. Exit Gas Temperature: 540°F each stack
 12. Exit Gas Moisture: 14%
- C. The following observations, checks, and operations apply to this source and shall be conducted on the schedule specified.

Continuously Monitored

1. Opacity
2. Temperatures-a. ESP Inlet and Outlet
 - b. Furnace
 - c. Bypass
 - d. Kiln Outlet
 - e. Boiler Outlet
 - f. Primary and Secondary Superheater
3. Pressures-a. Primary Superheater Steam
 - b. Secondary Superheater Steam

Every Two Hours

1. Monitor/inspect fly ash removal equipment
2. Read Instruments on Automatic Voltage Controllers (A.V.C.)
3. Observe rapper operation
4. Observe pressures and temperatures throughout system
5. Observe visual emissions
6. Observe all fans for proper operation
7. Inspect precipitator externals for hot spots, air infiltration, etc.
8. Observe fly ash silo operation *if in use.*
9. Monitor ash temperature
10. Primary Voltage
11. Primary current
12. Secondary voltage
13. Secondary current
14. Spark rate rapper frequency
15. Rapper vibrator frequency
16. Rapper vibrator duration

10//
PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

SPECIFIC CONDITIONS (con't):

- (1) Using the least pollution causing material available on site to charge the furnace on start-up.
- (2) Turning on the electrostatic precipitator as soon as possible but no later than two hours after the furnace is ignited.

The permittee shall maintain a log detailing the following information on every start-up of a unit:

- (1) Time (to the nearest minute) at which the furnace is ignited.
- (2) Time (to the nearest minute) at which the electrostatic precipitator is turned on and operational.
- (3) Temperature of the flue gas at the electrostatic precipitator inlet when it is turned on.
- (4) Six minute opacity reading taken from the opacity monitor strip chart beginning at two hours following the ignition of the furnace.

These records are to be maintained for a period of two years and shall be accessible to representatives of the Department and the Environmental Protection Commission of Hillsborough County for their inspection.

15. Operation and Maintenance Plan for Particulate Control (Section 17-2.650(2), F.A.C.)

A. Process Parameters:

1. Source Designator: Units Nos. 1-4
2. Maximum Charging Rate: 250 tons per day per unit, 1000 tons per day total
3. Maximum Heat Input Rate: 2,500 MMBTU/day/line, 9,000 MMBTU/day total
4. Permitted Operating Schedule: 24 Hrs/day, 7 days/wk., 52 wks/yr.
5. Furnace Temperature: 2200-2400° F
6. Fuel Type: Unsorted Municipal Waste
7. Design Fuel Analysis: Carbon-25.6%, Nitrogen-0.58%, Hydrogen-3.7%, Sulfur-0.3%, Oxygen-22.75%, Moisture-30.0%, Non-combustibles-18.0%
8. Combustion Conditions: 50-80% excess air
7-11% O₂ in flue gas
9. Steam Pressure: 650 psig
10. Steam Temperature: 700°F
11. Steam Production: 208,400 lbs/hr. total normal flow rate
12. Maximum Permitted Electrical Output: 25 MW

BEST AVAILABLE COPY

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

SPECIFIC CONDITIONS (con't):

D. Records:

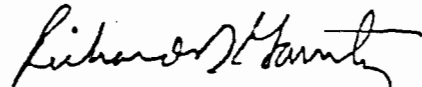
Records of inspections, maintenance, and performance parameters shall be retained for a minimum of two years and shall be made available to the Department or the Hillsborough County Environmental Protection Commission upon request (Subsection 17-2.650(2)(g)5., F.A.C.)

16. Municipal waste and infectious waste shall be burned in the facility. Waste oil collected from spills cleaned up by the Port Authority not exceeding 10,000 gallons per day from tanker trucks or 10 tons per day of fiber drums shall also be burned. Wastewater treatment plant sludges or hazardous wastes shall not be incinerated.

17. Electrical output for sale to Tampa Electric Company (TECO) shall not exceed 25 MW.

Issued this 13 day of Feb
1987.

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION



Richard D. Garrity, Ph.D.
District Manager

PERMITTEE:
City of Tampa

Permit/Certification No.: A029-114760
Project: McKay Bay Refuse-to-Energy
Facility Units 1 thru 4

SPECIFIC CONDITIONS (con't):

Daily

1. Clean opacity monitor lenses.
2. Monitor T/R temperature
3. Check gear box reservoir oil levels
4. Monitor charging rate per line
5. Monitor hours of operation per line

Weekly

1. Calibrate opacity monitor
2. Lubricate all external bearings, chains, idlers, sprockets
3. Lubricate fly ash collecting equipment

Quarterly (During Outages)

1. Inspect precipitators internals; observe dust build up, corrosion
2. Check alignment of plates and electrodes
3. Inspect rappers, observe for cracking on rapper frame assembly
4. Clean rapper insulator bushing
5. Clean electrode bushings
6. Check screw conveyor bearings
7. Inspect all field connections, door frames, duct connections for corrosion
8. Replace door frame gaskets as needed
9. Inspect internal structural members for corrosion and integrity
10. Clean relay cabinets, clean motor starter and relay contacts
11. Check hopper heaters for proper operation
12. Check insulator housing heaters for proper operation
13. Lubricate key interlock system
14. Check resistance to ground by meggering
15. Record all control points on AVC Microprocessor

Annual

1. Perform smoke bomb test on housing (optional)
2. Ultrasonic thickness test on hoppers, inlet distribution baffles.
3. Check thickness of inlet electrode wires
4. Check Filter Earth Connection (Ground)
5. Inspect collection plates for corrosion
6. Check external structure members for integrity
7. Scan surfaces with optical pyrometer, checking insulation (running)
8. Run T/R oil analysis

BEST AVAILABLE COPY

Ms. Nancy McCann
Tampa, Florida 33602

Page Two

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Tampa, Florida.

Sincerely,



James Wm. Estler
Air Permitting Engineer

JWE/js

cc: HCEPC

CERTIFICATE OF SERVICE

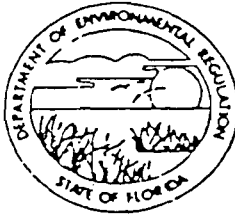
This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 2-13-87 to the listed persons.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(10), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Jean Sebesta
Clerk

2-13-87
Date

DEPARTMENT OF ENVIRONMENTAL REGULATION



SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33637-9544

813-985-7402
SunCom - 542-8000

BOB MARTINEZ
GOVERNOR

DALE TWACHTMANN
SECRETARY

DR. RICHARD D. GARRITY
DISTRICT MANAGER

PERMITTEE:

Ms. Nancy McCann
Urban Environmental Coordinator
Office of Environmental
Coordination
City of Tampa
City Hall Plaza, 5N
Tampa, Florida 33602

PERMIT/CERTIFICATION

Permit No.: A029-114760
County: Hillsborough
Expiration Date: 2-11-92
Project: McKay Bay Refuse-
to-Energy Facility
Units 1 thru 4

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Location: 107 North 34th St., adjacent to McKay Bay, Tampa

UTM: 17-360.0E 3091.9N NEDS NO: 0127 Point ID:

01-Unit No. 1
02-Unit No. 2
03-Unit No. 3
04-Unit No. 4

Replaces Permit No.: AC29-47277



1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
tel: 813 281-2900
fax: 813 288-8787

RECEIVED

OCT 07 2004

BUREAU OF AIR REGULATION

October 4, 2004

Mr. Ed Svec
Title V Air Program
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Application for Revision to Title V Air Operation Permit No. 0570127-001-AV
McKay Bay Refuse to Energy Facility

Dear Mr. Svec:

Enclosed, please find four copies of the first six pages of FDEP Form No. 62-210.900(1), entitled "Application for Air Permit - Long Form". CDM, on behalf of the City of Tampa, is submitting this application to revise the City's existing Title V permit to incorporate certain provisions of a USEPA Direct Final Rule for "Standards of Performance for Large Municipal Waste Combustors" published on November 16, 2001 (see 66 FR 57824). The Direct Final Rule amends 40 CFR 60.58b, Compliance and Performance Testing, by extending the startup, shutdown, and malfunction period to 15 hours for carbon monoxide following loss of boiler water level control and/or loss of combustion air control.

The applicant proposes that Specific Condition A. 32 of the existing permit be amended by inserting: "For the purpose of compliance with the carbon monoxide emission limits in 60.53b(a), if a loss of boiler water level control (e.g. boiler waterwall tube failure) or a loss of combustion air control (e.g. loss of combustion air fan, induced draft fan, combustion grate bar failure) is determined to be a malfunction, the duration of the malfunction period is limited to 15 hours per occurrence."

Very truly yours,

Jason M. Gorrie, P.E.
Senior Project Manager
Camp Dresser & McKee Inc.

cc: Hillsborough County EPC
WMBI
Greig Grotecloss
J. Cascio
A. Walter, SWD

S:\TAMPA (See Archived CD)\tb04001.doc



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: City of Tampa	
2. Site Name: McKay Bay Refuse to Energy Facility	
3. Facility Identification Number: 0570127	
4. Facility Location Street Address or Other Locator: 107 N. 34th Street City: Tampa County: Hillsborough Zip Code:	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Jason M. Gorrie	
2. Application Contact Mailing Address... Organization/Firm: CDM Street Address: 1715 N. Westshore, Suite 875 City: Tampa State: FL Zip Code: 33607	
3. Application Contact Telephone Numbers... Telephone: (813) 281- 2900 ext. Fax: (813) 288 - 8787	
4. Application Contact Email Address: gorriejm@cdm.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	8-7-04
2. Project Number(s):	0570127-004-AV
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

Air construction permit.

Air Operation Permit

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Application being submitted to incorporate a rule change that is applicable to the facility. Specifically, the applicant is requesting that the language in revised rule 40 CFR 60.58b(a) relating to startup/shutdown/malfunction provisions for Municipal Waste Combustors be incorporated into Title V Permit No. 0570127-001-AV.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
103	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 1	Title V	\$0
104	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 2	Title V	\$0
105	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 3	Title V	\$0
106	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 4	Title V	\$0


Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

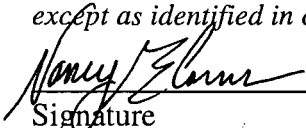
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Nancy McCann
2. Owner/Authorized Representative Mailing Address... Organization/Firm: City of Tampa Street Address: 4010 Spruce Street City: Tampa State: FL Zip Code: 33607
3. Owner/Authorized Representative Telephone Numbers... Telephone: (813) 348 - 1118 ext. Fax: () -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. 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 and all other requirements identified in this application to which the facility is subject. 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 the facility or any permitted emissions unit.</i>  Signature _____ Date <u>9/30/04</u>

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Nancy McCann
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: City of Tampa Street Address: 4010 Spruce Street City: Tampa State: FL Zip Code: 33607
4. Application Responsible Official Telephone Numbers... Telephone: (813) 348 - 1118 ext. Fax: () -
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature _____ Date <u>9/30/04</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: **Jason M. Gorrie**

Registration Number: **55341**

2. Professional Engineer Mailing Address...

Organization/Firm: **CDM**

Street Address: **1715 N. Westshore, Suite 875**

City: **Tampa**

State: **FL**

Zip Code: **33607**

3. Professional Engineer Telephone Numbers...

Telephone: **(813) 281-2900** ext. Fax: **(813) 288-8787**

4. Professional Engineer Email Address: **gorriejm@cdm.com**

5. 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.

(3) If the purpose of this application is to obtain a Title V 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 plan and schedule is submitted with this application.

(4) If the purpose of this application is to obtain an air construction permit (check here , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal 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.

(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal 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

Date

7/30/04

Attach any exception to certification statement.



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit for a proposed project:

- subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- at an existing federally enforceable state air operation permit (FESOP) or Title V permitted facility.

Air Operation Permit – Use this form to apply for:

- an initial federally enforceable state air operation permit (FESOP); or
- an initial/revised/renewal Title V air operation permit.

Air Construction Permit & Revised/Renewal Title V Air Operation Permit (Concurrent Processing Option)

– Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: City of Tampa	
2. Site Name: McKay Bay Refuse to Energy Facility	
3. Facility Identification Number: 0570127	
4. Facility Location Street Address or Other Locator: 107 N. 34th Street City: Tampa County: Hillsborough Zip Code:	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Jason M. Gorrie	
2. Application Contact Mailing Address... Organization/Firm: CDM Street Address: 1715 N. Westshore, Suite 875 City: Tampa State: FL Zip Code: 33607	
3. Application Contact Telephone Numbers... Telephone: (813) 281- 2900 ext. Fax: (813) 288 - 8787	
4. Application Contact Email Address: gorriejm@cdm.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	8-7-04
2. Project Number(s):	0570127-004-AV
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

Air construction permit.

Air Operation Permit

Initial Title V air operation permit.

Title V air operation permit revision.

Title V air operation permit renewal.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.

Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

Air construction permit and Title V permit revision, incorporating the proposed project.

Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

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Application Comment

Application being submitted to incorporate a rule change that is applicable to the facility. Specifically, the applicant is requesting that the language in revised rule 40 CFR 60.58b(a) relating to startup/shutdown/malfunction provisions for Municipal Waste Combustors be incorporated into Title V Permit No. 0570127-001-AV.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
103	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 1	Title V	\$0
104	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 2	Title V	\$0
105	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 3	Title V	\$0
106	120 MMBtu/hr (maximum) Municipal Solid Waste Combustor & Auxiliary Burners – Unit 4	Title V	\$0

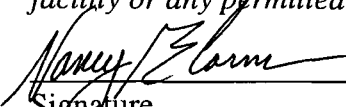
Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

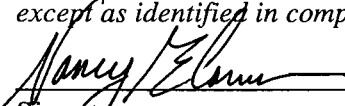
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Nancy McCann
2. Owner/Authorized Representative Mailing Address... Organization/Firm: City of Tampa Street Address: 4010 Spruce Street City: Tampa State: FL Zip Code: 33607
3. Owner/Authorized Representative Telephone Numbers... Telephone: (813) 348 - 1118 ext. Fax: () -
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. 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 and all other requirements identified in this application to which the facility is subject. 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 the facility or any permitted emissions unit.</i>  Signature _____ Date <u>9/30/04</u>

APPLICATION INFORMATION

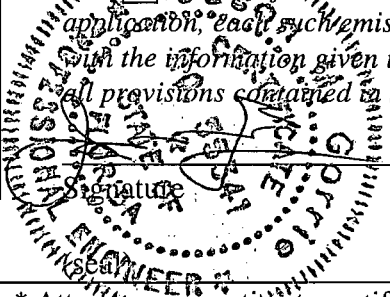
Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Nancy McCann
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: City of Tampa Street Address: 4010 Spruce Street City: Tampa State: FL Zip Code: 33607
4. Application Responsible Official Telephone Numbers... Telephone: (813) 348 - 1118 ext. Fax: () -
5. Application Responsible Official Email Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. 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 and all other applicable requirements identified in this application to which the Title V source is subject. 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 the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature _____ Date <u>9/30/04</u>

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Jason M. Gorrie Registration Number: 55341
2. Professional Engineer Mailing Address... Organization/Firm: CDM Street Address: 1715 N. Westshore, Suite 875 City: Tampa State: FL Zip Code: 33607
3. Professional Engineer Telephone Numbers... Telephone: (813) 281- 2900 ext. Fax: (813) 288 - 8787
4. Professional Engineer Email Address: gorriejm@cdm.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(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</i> <i>(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.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/> , 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 plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/> , 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.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , 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.</i>  _____ Signature 9/30/04 _____ Date

* Attach any exception to certification statement.

Appendix H-1, Permit History/ID Number Changes

(For Tracking Purposes Only)

Gulf Power Company
Lansing Smith Plant

Permit No.: 0050014-001-AV
Facility ID No.: 0050014

E.U.								
<u>ID No</u>	<u>Description</u>	<u>Permit No.</u>	<u>Issue Date</u>	<u>Expiration Date</u>	<u>Extended Date</u>	<u>Revised Date(s)</u>	<u>MW Output</u>	<u>Heat Input (MMBtu/hr)</u>
-001	Lansing Smith #1 - Stack	AO03-211310	04/17/92	04/01/97			175	(1,768) ^{1,2}
		AO03-134885	07/09/87	06/01/92			175	(1,768) ^{1,2}
		AO03-56886	07/15/82	07/01/87			175	(1,566) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-2031	08/17/77	08/17/82			N/S	1,556
		AC03-2023	02/10/75	01/01/77	05/15/77		N/S	1,229
-002	Lansing Smith #2 - Stack	AO-3-1133	01/29/73	12/15/74			130	1,300
		AO03-211310	04/17/92	04/01/97			205	(2,042) ^{1,2}
		AO03-134887	07/09/87	06/01/92			205	(2,042) ^{1,2}
		AO03-56888	07/15/82	07/01/87			205	(1,974) ^{1,3}
		Secretarial ORDER ⁴	10/18/85					
		Secretarial ORDER ⁵	12/07/82					
		AO03-7636	03/22/78	03/22/83			N/S	1,924
AC03-2024	02/10/75	01/01/77	05/15/77		N/S	1,404		
	AO-3-1132	01/29/73	12/15/74			140.75	1,406	
-003	Peaking Turbines	AO03-249657	05/19/94	01/15/96				

ID Number Changes (for tracking purposes):

From: **Facility ID No.:** 10PCY030014

To: **Facility ID No.:** 0050014

¹ Number in parenthesis indicates number reported in application, not specified in the permit.

² "Maximum allowable heat input is that heat input necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate matter compliance test was conducted."

³ "Maximum allowable heat input is that heat input necessary to maintain electrical load output at the level at which the most recent successful quarterly particulate matter test was conducted."

⁴ Secretarial ORDER issued to relax semi-annual PM testing requirement to annual.

⁵ Secretarial ORDER issued to relax quarterly PM testing requirement to semi-annual.

Memorandum

TO: Ed Middleswart, NWD

FROM: Bruce Mitchell *for BM*

DATE: November 18, 1996

SUBJECT: Completeness Review of an Application Package for a Title V Operation Permit
Gulf Power Company: 0050014-001-AV

The Title V operating permit application package for the referenced facility is being processed in Tallahassee. The application was previously forwarded to your office for your files and future reference. Please have someone review the package for completeness and respond in writing by December 15, 1996, if you have any comments. Otherwise, no response is required. If there are any questions, please call the project engineer, Jonathan Holtom, at 904/488-1344 or SC:278-1344. It is very important to verify the compliance statement regarding the facility. Since we do not have a readily effective means of determining compliance at the time the application was submitted, please advise if you know of any emissions unit(s) that were not in compliance at that time and provide supporting information. Also, do not write on the documents.

If there are any questions regarding this request, please call me or Scott Sheplak at the above number(s).

RBM/bm

cc: Andy Allen

1994

F



Florida Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

EXTENDED
MAY 22 1994
Virginia B. Wetherell
Secretary

PERMITTEE:
Gulf Power Company

I.D. Number: 10PCY03001403
Permit/Certification Number: A003-249657
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996
County: Bay
Latitude/Longitude: 30°15'58"N/85°41'56"W
Project: Two combustion turbines/peaking unit

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-296, 17-297 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of two combustion turbines (A and B) fueled by No. 2 fuel oil (distillate) with a maximum of 0.5% sulfur and a maximum heat input of 542 MMBtu/hour used to drive a single peaking generator.

Operation of this source shall be consistent with the operation permit application dated April 15, 1994.

Located at West Bay in Lynn Haven, Bay County.

Specific Condition No. 2 establishes a maximum allowable operating and testing rate.

Specific Condition No. 4 limits the fuel oil to No. 2 oil with a maximum of 0.5% sulfur by weight.

Specific Condition No. 5 establishes emission limits.

Specific Condition No. 6 establishes compliance testing requirements.

Specific Condition No. 7 requires annual operation reports.

Specific Condition No. 8 requires submission of a Major Air Pollution Source Annual Operation Fee form.

Specific Condition No. 9 requires submission of a Title V permit application.

PERMITTEE:
Gulf Power Company

I.D. Number: 10PCY03001403
Permit/Certification Number: A003-249657
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit (FAC Rule 17-4.160).

Operation

2. The maximum allowable operating rate is 542 MMBtu per hour. This is the operating rate at which compliance with standards shall be demonstrated. Testing of emissions shall be conducted at 95 to 100% of the manufacturer's rated heat input based on the average ambient air temperature during the test. Compliance shall be determined using the turbine manufacturer's throughput rating for the average ambient temperature by multiplying the permitted emission limit at ISO conditions (59°F and 60% humidity) by the ratio of the tested heat input to the maximum heat input (MMBtu/hr) at ISO conditions. Manufacturer's rating data for correcting heat input and emissions to other temperatures must be submitted to the Department at least 30 days before the first compliance test. Manufacturer's data shall be continually validated by scheduling subsequent annual tests for successive quarters of the year. If it is impracticable to test at capacity, then sources may be tested at less than capacity; if the source is tested at less than capacity, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacity is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit with prior notification to the Department. (FAC Rule 17-4.070)

3. The maximum hours of operation are 24 hours/day, 7 days/week, and 52 weeks/year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually. (Application dated 04/15/94)

4. The maximum sulfur content of the No. 2 fuel oil is limited to 0.5% sulfur by weight. The Permittee shall maintain a log available for Department inspection of the fuel oil sulfur content. (Application dated 04/15/94)

Emissions

6. The maximum allowable emission limit for each pollutant is as follows:

Pollutant	FAC Rule	Allowable Emissions
VE	17-296.310	20% opacity

PERMITTEE:
Gulf Power Company

I.D. Number: 10PCY03001403
Permit/Certification Number: A003-249657
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

Testing

6. Emissions tests for visible emissions shall be performed between October 1 and November 30, 1998 in accordance with the test methods and frequency indicated, with notification to the Department 15 days prior to testing. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. For good cause, the Permittee may request an extension of a compliance test due date. However, inadequate planning of testing does not constitute good cause for an extension of the compliance test due date. The test report documentation must be submitted to the Department within 45 days after completion of testing.

<u>Pollutant</u>	<u>Frequency</u>	<u>Test Method</u>	<u>Reference</u>
VE	once/permit	DEP method 9	FAC Rule 17-297

The VE test shall be for a duration of 60 minutes. Test reports shall comply with F.A.C. Rule 17-297.570, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 17-297.340(2).

Administrative

7. An annual operation report [DEP Form 17-210.900(4) attached] shall be submitted by March 1 each year. The attached form shall be reproduced by the Permittee and used for future annual submittals (FAC Rule 17-210.370).

8. In accordance with F.A.C. Rule 17-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 17-213.900(11) attached] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The attached form shall be reproduced by the Permittee and used for future annual submittals. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V (Facility I.D. Number), 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

9. An application to renew this permit shall be submitted as required for a Title V permit (FAC Rule 17-210).

PERMITTEE:
Gulf Power Company

I.D. Number: 10PCY03001403
Permit/Certification Number: A003-249657
Date of Issue: May 19, 1994
Expiration Date: January 15, 1996

SPECIFIC CONDITIONS:

10. The permanent source identification number for this point source is 10PCY03001403. Please cite this number on all test reports and other correspondence specific to this permitted point source. (FAC Rule 17-297.570)

11. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, use telephone number (904) 872-4375 during normal working hours. (FAC Rule 17-210.700)

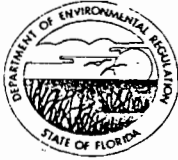
Expiration Date:

Issued this 19th day of May,
1994.

January 15, 1996

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


BOBBY A. COOLEY
District Director



Florida Department of Environmental Regulation

Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Gulf Power Company

I.D. Number: 10PCY03001401 and 02
Permit/Certification Number: AC03-211310
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997
County: Bay
Latitude/Longitude: 30°16'08"N/85°42'02"W
Section/Township/Range: 36/2S/15W
Project: Smith Units No. 1 and No. 2
Coal Fired Boilers

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Operation of Smith Units No. 1 and No. 2, both coal fired boilers, generating 175 and 205 megawatts of electricity for Units No. 1 and No. 2 respectively. Particulate emissions from each Unit are controlled by hot side electrostatic precipitators manufactured by Buell Model BAL 2X34N333-4-3P followed by cold side electrostatic precipitators manufactured by American Standard Series 371, Design 24-9P. Sulfur dioxide emissions are controlled by the sulfur content of the coal used as fuel. Sulfur dioxide, nitrogen dioxide, oxygen and opacity are monitored by continuous emission monitors on each Unit.

Located at the end of County Road 391, north shore of North Bay, 2.5 miles northwest of Lynn Haven.

Specific Condition No. 7 requires logging excess emissions.
Specific Condition No. 8 requires keeping a maintenance log.
Specific Condition No. 9 requires submitting quarterly excess emissions reports.
Specific Condition No. 11 requires annual particulate emissions tests due before the end of September.
Specific Condition No. 12 requires maintenance of a QC program.
Specific Condition No. 14 requires reporting of excess emissions as soon as possible.
Specific Condition No. 15 requires actions taken upon particulate test failures.
Specific Condition No. 18 requires submittal of permit renewal application by February 1, 1997.

Specific Condition No. 16 requires submittal of annual operation reports

PERMITTEE:
Gulf Power Company

I.D. Number: 10PCY03001401 and 02
Permit/Certification Number: AC03-211310
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

1. The attached General Conditions are part of this permit.
2. The maximum allowable heat inputs are those heat inputs necessary to maintain electrical load output at 110% of the level at which the most recent successful particulate emissions compliance test was conducted for each unit. If the test was conducted at less than 90% of rated capacity of the unit, permittee may operate the unit at loads up to the rated capacity (175 and 205 megawatts for Units No. 1 and No. 2 respectively) for purposes of preparation for testing for up to ten calendar days. The Department shall be advised in writing prior to each testing.
3. Particulate emissions shall not exceed 0.1 pounds per million Btu heat input.
4. Sulfur dioxide emissions shall not exceed 5.90 pounds per million Btu heat input.
5. Visible emissions shall not exceed 40% opacity.
6. Excess emissions are defined as:
 - A. Any six-minute average for opacity which exceeds the standard.
 - B. Any 24-hour average for sulfur dioxide which exceeds the standard.
7. A log shall be maintained showing the:
 - A. Duration of excess visible emissions and their causes.
 - B. Duration of excess SO₂ emissions.
8. A maintenance log of the continuous monitoring system shall be kept showing:
 - A. Time out of service.
 - B. Calibrations and adjustments.
9. A quarterly report of excess emissions shall be submitted within 30 days following the end of each calendar quarter. The report shall consist of each individual exceedance of opacity or SO₂ emissions (Specific Conditions 6 and 7) with duration, magnitude and cause. Any exceedance that is beyond the allowances of FAC Rule 17-2.250 shall be highlighted with note indicating compliance with Specific Condition 14 below.
10. Units 1 and 2 use a common stack. Visible emission violations from this stack shall be attributed to both Units unless opacity meter results show the specific Unit causing the violation.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PCY03001401 and 02
Permit/Certification Number: A003-211310
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

11. Particulate emissions tests are required to show continuing compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Tests shall be conducted in accordance with EPA methods 1, 2, 3 and 17. Such tests shall be conducted once per year before the end of September. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

12. Continuous SO₂ emission monitoring 24-hour averages are required to demonstrate compliance with the standard of the Department (Specific Condition 4). A valid 24-hour average shall consist of no less than 18 hours of valid data capture per calendar day. In the event that valid data capture is not available, the permittee shall initiate as-fired fuel sampling to demonstrate compliance with the SO₂ emission standard. The as-fired fuel sampling shall be initiated no later than 36 hours after the permittee has verified the problem or no later than 36 hours after the end of the affected calendar day. Fuel sampling shall continue until such time as the valid data capture is restored. In lieu of as-fired fuel sampling the permittee may elect to demonstrate SO₂ emission compliance by the temporary use of a spare SO₂ emission monitor. The spare SO₂ emissions monitor must be installed and collecting data in the same time frame as required above for as-fired fuel sampling.

Maintain a QC program. As a minimum the QC program must include written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities:

1. Calibration of CEMS.
2. CD determination and adjustment of CEMS.
3. Preventative maintenance of CEMS (including spare parts inventory).
4. Data recording, calculations and reporting.
5. Accuracy audit procedures including sampling and analysis methods.
6. Program of corrective action for malfunctioning CEMS.

13. Excess emissions as stated in Florida Administrative Code Rule 17-2.250 shall be allowed.

14. The Department shall be notified as soon as possible (by telephone) of excess emissions that are beyond the allowances of FAC Rule 17-2.250, such as:
A. Any soot blowing or load changes that cause excess visible emissions for a period longer than three hours, or that exceed 60% opacity (six minute average) more than four times in any one day.
B. Any malfunction that causes visible emissions for a period longer than two hour in any one day.
C. A 24-hour average of SO₂ emissions measured by the continuous monitor that exceeds the standard, or daily average SO₂ emissions measured by coal analysis (in the event the permittee chooses) that exceeds the standard.

Immediately upon notification of excess emissions that are beyond the allowances, the permittee shall take the necessary steps to determine the cause and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation with corrective action to avoid recurrence.

PERMITTEE:

Gulf Power Company

I.D. Number: 10PCY03001401 and 02
Permit/Certification Number: A003-211310
Date of Issue: April 17, 1992

Expiration Date: April 1, 1997

SPECIFIC CONDITIONS:

15. Immediately upon notification of a particulate test report that fails to demonstrate compliance with the particulate emission limit of 0.1 pounds per million Btu heat input, the permittee shall take necessary steps to determine the cause of the test failure and arrange a meeting with the Department within 72 hours to discuss a settlement of the violation and a schedule for retesting when the cause of the test failure has been determined and corrected.

16. An annual operation report (DER Form 17-1.202(6) attached) shall be submitted by March 1 each year. The attached form shall be reproduced by the permittee and used for future annual submittals.

17. An application to renew this permit shall be submitted prior to February 1, 1997.

18. The permanent source identification numbers for these point sources are:
10PCY03001401 Smith Unit No. 1, and
10PCY03001402 Smith Unit No. 2.
Please cite the appropriate number on all test reports and other correspondence specific to a permitted point source.

19. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 436-8300, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 488-1320. For routine business, telephone (904) 872-4375 during normal working hours.

Expiration date:

April 1, 1997

Issued this 17th day of April, 1992.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

ROBERT V. KRIEGLER
District Director

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