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November 14, 2008

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

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BUREAU OF AIR REGULATION

Subject: Response to Request for Additional Information  
Project No. 1010056-006-AV  
Pasco County Resource Recovery Facility

Dear Mr. Sheplak:

Pasco County is in receipt of your Request for Additional Information dated November 5, 2008 related to the recently submitted Application for Permit Revision for the Pasco County Resource Recovery Facility. On behalf of Pasco County, CDM is hereby providing the following responses:

- 1) *Please prepare a chart(s) showing the current emission standards/limits vs. the new emission standards/limits under the amendments for Units 1, 2, and 3.*

*For NOx and CO emissions, please include the calculated equivalent lbs/hr and tons per year (TPY) for the Cb standards/limits (as amended) and for the BACT standards/limits.*

*Please highlight the most stringent emission standard/limit for each pollutant in the chart(s)*

Response: See Table 1 below.



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Table 1. Comparison of Existing and Future Emissions Limits				
Pollutant	Current Limit	New Limit	Equivalent Emissions under Amended Subpart Cb Standards	
			Lbs/hr	Tons/yr
PM	27 mg/dscm @ 7% O <sub>2</sub>	25 mg/dscm @ 7% O <sub>2</sub>	7.2	31.54
NOx	205 ppmdv @ 7% O <sub>2</sub>	205 ppmdv @ 7% O <sub>2</sub>	113.62 (BACT = 90.02)	497.66 (BACT = 394.29)
CO	100 ppmdv @ 7% O <sub>2</sub>	100 ppmdv @ 7% O <sub>2</sub>	33.76 (BACT = 134.96)	147.87 (BACT = 591.12)
Cadmium	0.040 mg/dscm @ 7% O <sub>2</sub>	0.035 mg/dscm @ 7% O <sub>2</sub>	0.001	0.0442
Mercury	0.070 mg/dscm @ 7% O <sub>2</sub>	0.050 mg/dscm @ 7% O <sub>2</sub>	0.00145	0.064
Lead	0.44 mg/dscm @ 7% O <sub>2</sub>	0.40 mg/dscm @ 7% O <sub>2</sub>	0.01159	0.5076
Fluoride	0.008 lb/MMBTU	N/A	N/A	N/A
Beryllium	1.35 x 10 <sup>-7</sup> lb/MMBTU	N/A	N/A	N/A
VOC	0.21 lb/MMBTU	N/A	N/A	N/A
SO <sub>2</sub>	29 ppmdv @ 7% O <sub>2</sub>	29 ppmdv @ 7% O <sub>2</sub>	N/A	N/A
HCl	29 ppmdv @ 7% O <sub>2</sub>	29 ppmdv @ 7% O <sub>2</sub>	N/A	N/A
Dioxins/Furans	30 ng/dscm @ 7% O <sub>2</sub>	30 ng/dscm @ 7% O <sub>2</sub>	N/A	N/A
Opacity	10%	10%	N/A	N/A



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Please note that the "calculated equivalent" lb/hr and TPY values expressed in the table above are NOT equivalent limitations. To convert a concentration-based limitation (ppmdv) to a mass-based limitation (lb/hr) requires an assumption for airflow. Because airflow is not "limited" by regulation or permit, conversion from concentration units to mass units does not equate to a "limitation".

The most stringent limitation is highlighted as requested. Please note that the revisions to Subpart Cb did not impact all pollutants.

- 2) ... Please provide any documentation of US EPA's intent for this change to apply to all air pollutant testing under the amendments like the specific reference in the federal register notice.

Attached, please find the applicable language (highlighted) specifying USEPA's intent to provide flexibility to the testing schedule so that a facility tests once per calendar year, but no less than 9 months and no more than 15 months since the previous test. Intentional exclusion of an individual pollutant from the 9 to 15 month window would entirely negate the intent specified in the Federal Register. A discussion between Mr. Tony St. Clair in CDM's Houston, TX office and Mr. Walt Stevenson in USEPA's Research Triangle Park office on November 7, 2008 verified that the exclusion of HCl and fugitive ash from the final rule was a scrivener's error on the part of USEPA – an error which they intend to correct upon issuance of the revised rule following resolution of the petition for reconsideration. Mr. Stevenson further advised that because Subpart Cb is an Emission Guideline (as opposed to a Standard of Performance), the States have full authority to interpret and implement the provisions for inclusion in their 111(d) Plan and/or operating permits.

- 3) Are any modifications to Unit 1, 2 and/or 3 necessary to come into compliance with the federal amendment changes?

No modifications are necessary, as the facility has already demonstrated its ability to comply with the revised limits.



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Thank you for your consideration of these responses. If you have any questions, please do not hesitate to contact me at (813) 281-2900.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Jason M. Gorrie', written over a circular embossed seal.

Jason M. Gorrie, P.E.

Principal Engineer

Camp Dresser & McKee Inc.

cc: John Power, Pasco County

Viet Ta, Covanta Pasco