

Department of Environmental Protection

Lawton Chiles
Governor

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

June 12, 1998

Virginia B. Wetherell
Secretary

CERTIFIED MAIL

Mr. Douglas S. Bramlett
Assistant County Administrator
Pasco County
Utilities Services Branch
Public Works/Utilities Bldg., S-213
7530 Little Road
New Port Richey, Florida 34654

Re: Municipal Waste Combustor, SNCR Addition

Dear Mr. Bramlett:

The Department has reviewed your letter of May 21, 1998 and agrees that the addition of selective non-catalytic reduction (SNCR) to the existing plant does not constitute a modification as defined by Rule 62-210.200, F.A.C. However, the Department has typically requested that source owners that are installing new pollution control equipment for major sources, or any pollution control equipment which must be custom designed, apply for an operation permit amendment to reflect the change. Such request would need to be signed and sealed by a professional engineer registered in Florida. The application for permit amendment need not be extensive, but should include a site plan showing the addition of equipment (the ammonia tank in this case), a description of the control equipment, and a sketch or manufacturer's cut sheet showing the physical changes or additional piping and injectors at the furnace walls. Pursuant to Rule 62-4.050(r)2., F.A.C., there is no application fee required for this amendment. No public notice is required for this type of permit amendment, once issued.

Please submit this information prior to undertaking construction at the plant. Please call me at 850/921-9519 if you have any questions.

Sincerely,

Joseph Kahn, P.E.
New Source Review Section

/jk



PASCO COUNTY, FLORIDA

DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (813) 847-8145
FAX (813) 847-8064

UTILITIES SERVICES BRANCH
PUB. WKS./UTILITIES BLDG., S-213
7530 LITTLE ROAD
NEW PORT RICHEY, FL 34654

May 21, 1998

Mr. Al Linero, P.E.
Bureau of Air Regulation
Florida Department of
Environmental Protection
3804 Coconut Palm Drive
Tampa, FL 33619-8318

RECEIVED

JUN 05 1998

BUREAU OF
AIR REGULATION

RECEIVED
MAY 27 1998

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

RE: Permit Requirement/Municipal Waste Combustor

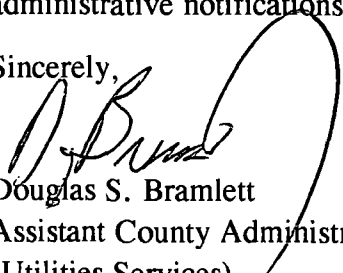
Dear Mr. Linero:

Pasco County owns a 1,050 ton-per-day Municipal Waste Combustor subject to the provisions of 40 CFR 60, Subpart Cb. Pursuant to the provisions of Subpart Cb, the facility intends to enhance the air pollution control equipment (APC) to include a selective non-catalytic reduction (SNCR) system to reduce emissions of nitrogen oxides.

It is our reading of Rule 62-210.300(1), F.A.C., entitled "Permits Required", that an air construction permit is required in the case of "any proposed new or modified facility or emissions unit" prior to construction. The applicable Florida Department of Environmental Protection (FDEP) definitions are clear that the installation of SNCR equipment does not constitute a "modification" because there will be no "increase in the actual emissions of any air pollutant subject to regulation under the Act" (see 62-210.200(182), F.A.C.). Accordingly, we conclude that a separate air construction permit is not necessary for the retrofit to proceed. Please note that ammonia is not a "pollutant subject to regulation under the Act" for municipal waste combustors.

Because the FDEP rules do not require a construction permit, we are seeking your guidance as it relates to any other administrative notifications that may be necessary. Thank you in advance for your consideration in this matter.

Sincerely,


Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvv\19\linero

cc: Daniel E. Strobbridge, QEP, Associate, Camp Dresser & McKee Inc., 1715 N. Westshore Blvd., Suite 875,
Tampa, FL 33607
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager

P 265 659 355

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to		Douglas Brantlett
Street & Number		OSCO Co.
Post Office, State, & ZIP Code		New Port Richey, 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		6-12-98
MWC - 5 NCR addition		

PS Form 3800, April 1995

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:

Douglas S. Bramlett
Assistant Co. Administrator
PESCO Co. - Utilities Services
Box 5-213
7530 Little Rd
New Port Richey, FL 34654

4a. Article Number

P 265 659 355

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)

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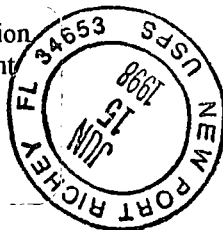
• Print your name, address, and ZIP Code in this box •

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JUN 18 1998

BUREAU OF
AIR REGULATION

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation, NSRS
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

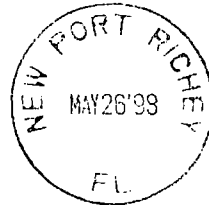




Douglas S. Bramlett
Assistant County Administrator
Utilities Services Branch
Pasco County Govt. Complex
Pub. Wks./Utilities Bldg., S-213
7530 Little Road
New Port Richey, FL 34654

RETURN SERVICE
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FIRST CLASS



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Mr. Al Linero, P.E.
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Florida Department of
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3804 Coconut Palm Drive
Tampa, FL 33619-8318



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