



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

June 8, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Power
Pasco County Resource Recovery Facility
14230 Hays Road
Spring Hill, Florida 34610

Re: **Request for Additional Information**
Project No. 1010056-005-AV
Renewal of Title V Air Operation Permit

Dear Mr. Power:

The Department has received your application for a Title V air operation permit renewal by electronic submission on April 19, 2005. After review, it has been determined that the application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. On the Purpose of Application page, only the box for "Title V Air Operation Permit revision" was checked. The attached Appendix E of the application includes several requests that, if agreeable to the department, would require a PSD permit revision before the changes could be recognized by the Title V permit. If you would prefer, a construction permit can be reviewed and processed concurrently with the Title V permit renewal. If this is the process that you would prefer, please correct the Purpose of Application page by checking the box next to "Air Construction permit and Title V permit renewal" as well as the box waiving the processing time clock for the construction permit.
2. The department is currently exploring the ramifications of removing what appear to be the less-restrictive PSD standards from your existing PSD permit, leaving only the NSPS imposed standards, in order to alleviate compliance conflicts and to eliminate duplicative monitoring requirements. To aid in the determination that the NSPS standards truly are more restrictive than the PSD standards, please provide a mathematical comparison of the different standards for each of the pollutants currently regulated in your permit. This comparison will need to closely consider the respective averaging times and the required adjustment percentages to either O₂ or CO₂, as appropriate.
3. In the CAM applicability analysis table, the baghouse efficiency is assumed to be 90%. This is quite low compared to typical baghouse efficiencies. At higher efficiencies, potential pre-control emissions could be much greater than listed in the table. Please explain the reasoning behind assuming a baghouse efficiency of only 90%.
4. Even though the units are exempt from the CAM requirements for the NSPS established PM limit, they are still subject to the CAM requirements for the PSD established PM limit unless, or until, the PSD limit is removed. Please propose a CAM plan that will provide reasonable assurances of compliance with the PSD established PM emissions limit. The plan should include the use of the COMS and the pressure drop across the baghouse as monitored indicators.

"More Protection, Less Process"

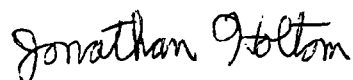
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5. The submitted CAM applicability analysis states that there is no control device for lead. However, lead is controlled by the baghouse. Based on the allowable emissions limits and a typical baghouse efficiency, pre-controlled lead emissions are potentially greater than the Title V threshold of 5 tons per year, which subjects the units to CAM for controlled emissions of lead. Please propose a CAM plan that will provide reasonable assurances of compliance with the PSD established lead emissions limit. The plan should include the use of the COMS and the pressure drop across the baghouse as monitored indicators.
6. The submitted CAM plan for fluoride emissions specifies that SO₂ removal efficiency will be used as an indicator to demonstrate that the fluoride emissions are being adequately controlled. However, no test data was submitted to demonstrate a correlation between SO₂ removal efficiency and actual fluoride emissions. Please provide a table of test data that compares the measured SO₂ removal efficiency to the actual fluoride emissions measured during the five most recent stack tests (fifteen data points). Include any available test data that shows what the fluoride emissions are prior to the spray dryer. Also, prepare and include the Monitoring Approach table that is required to be submitted as part of a complete CAM plan.
7. The submitted CAM applicability analysis states that the Leachate Facility (EU 005) is not subject to CAM. That determination appears to be based on an assumed baghouse efficiency of only 90%, however, typical baghouse efficiencies are generally greater than 99%. At a baghouse efficiency of 98%, the potential PM emissions from this unit are 113 tons per year. Please submit a CAM plan for PM emissions from this unit that are controlled by the baghouse.

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

If you have any questions regarding this matter, please call Jonathan Holtom, P.E., at 850/921-9531.

Sincerely,



Jonathan Holtom, P.E.
North Permitting Section

/jh

ec: Jason Gorie, P.E., CDM (GORRIEJM@CDM.COM)
Jason Waters, DEP – SWD (jason.waters@dep.state.fl.us)

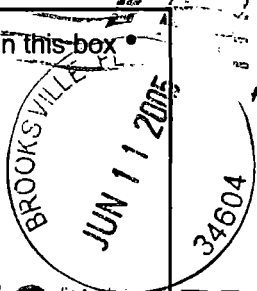
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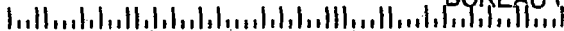


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Mr. John Power
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 14230 Hays Road
 Spring Hill, Florida 34610

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