



# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

October 11, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

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

Dear Mr. Power:

Thank you for your response to our request for additional information, which was received by mail on September 12. Upon review, it was determined that there are still a few issues that need further attention before a permit can be drafted. 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. For convenience, the numbered items will continue to coincide with the comments contained in our request for additional information, dated June 8, and your response, dated September 6.

1. Thank you for the updated page 2 of the application identifying your request for simultaneous processing of a construction permit and Title V permit, and granting the waiver of the construction permit processing clock. Based on the information discussed in comment 2, below, a Construction permit revision won't be necessary, and in some cases, would not be appropriate.
2. After further investigation into the issue of multiple requirements, we believe that based on EPA's intent and the provision found in our rules, multiple, redundant, or conflicting applicable requirements can be reduced to a single streamlined term or condition that is the most stringent of the multiple applicable requirements. To avoid having to continuously demonstrate compliance with multiple emissions limits, Rule 62-213.440(1), F.A.C. allows us, at your request, to create a new emissions limit in the Title V permit that will assure compliance with all of the other overlapping emissions limits. If you would like to take advantage of this option of streamlining your limits for purposes of lessening your compliance burden, please request that we do so and propose a new limit for purposes of the Title V permit for each of the pollutants that have multiple standards that you would like to have streamlined. The proposed limits will need to incorporate the most stringent limitations of the respective standards considering the concentration, the averaging time and the appropriate diluent. The comparison of the different emissions limits that you provided with your September 6 response is a good start, although, any streamlined limits should be proposed as concentration-based limits rather than just a lb/hour limit in order to account for varying load levels. The statement that it is impossible to identify differences in stringency between two periods based on averaging period criterion will no longer be an issue once the most stringent averaging time is established as the only one to show compliance with. The multiple limit issue is not as big of a concern for the pollutants that use continuous emissions monitors for compliance purposes, but establishing one limit that assures compliance with the others could reduce the compliance demonstration burden and help to clarify which of the limits are subject to CAM and which can be satisfied by using the federal monitoring requirements contained in the appropriate NSPS regulations.

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3. Since baghouses easily have efficiencies in the 99 – 99.9% range, using an efficiency of only 90% to determine pre-control emissions is not appropriate. For baghouses that are potentially subject to CAM, pre-control emissions must be established in order to clearly establish CAM applicability. Please provide the pre-control emissions calculations for the baghouses.
4. If a streamlined limit is established as described in comment 2, above, the issue of dual monitoring requirements should be able to be eliminated. The NSPS monitoring and CAM monitoring requirements still apply and will need to be listed in the permit as applicable requirements. However, if a streamlined limit is established, then a single set of monitoring requirements can also be established as long as it helps to assure compliance with all of the applicable requirements. If the most stringent limit established is the NSPS, then the NSPS monitoring should suffice. If the most stringent limit is the PSD limit, then CAM should suffice. However, if the most stringent limit is a blend of NSPS and PSD limits, then the required monitoring might also be a blend. Based on the “most stringent” limit proposed pursuant to comment 2, above, please provide the necessary monitoring information (either a completed CAM plan or NSPS parameters).
5. Because the PSD established limit for lead is more stringent than the NSPS established limit, compliance with the PSD limit will assure compliance with the NSPS limit. The monitoring requirements for the PSD limit are those imposed by CAM. Under a streamlined approach, if it can be shown that the NSPS required monitoring is at least as stringent as the CAM requirements then the CAM requirements can be subsumed into a new condition that establishes periodic monitoring requirements sufficient to satisfy all other monitoring requirements. Please provide 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. Please keep in mind that all CAM applicability determinations are site and unit specific. Determinations made for other Title V sources may not extend to your emissions unit. The fact that Pinellas County was able to confirm that their fluoride limit was established as a “no controls limit” (meaning they can meet their limit without a control device) does not automatically mean that Pasco County can do the same. In fact, a review of the original PSD permit and Site Certification, it appears that the fluoride limit was established after considering the abilities of the acid gas scrubber to remove fluoride. As with all pollutants potentially subject to CAM, if you can demonstrate the emissions limit can be met without the use of the associated control device, then that unit can be exempted from CAM for that particular pollutant. If you wish to make the claim that your unit is exempt from CAM for the control of fluoride emissions because the emissions limit can be met without the use of the control device, please submit the documentation to support your claim. If the fluoride emissions limit can not be met without the use of the control device, please provide a complete CAM plan using the scrubber pressure drop and scrubber water flow rate as indicators. If the pH of the scrubber water needs to be maintained at a certain level in order to meet the emissions limit, then that should also be included as an indicator to monitor.
7. As stated in the June 8 request for additional information, baghouse efficiencies are typically seen in the 99 – 99.9% range. Your request to reduce the hours of operation to 5256 hrs/yr may be acceptable if you can demonstrate that your baghouse is never more efficient than 98%. However, based on your permitted allowable emissions limit, a baghouse efficiency as high as 99.9% could result in potential emissions of 2260 tons per year. Therefore, an hourly limit of 5256 hrs per year would not be sufficient. Please explore some other method (AP-42, etc.) of determining your pre-control potential emissions. If pre-control emissions are less than 100 tpy, then CAM would not apply to the Leachate Facility. If potential pre-control emissions are greater than 100 tpy, then please submit a CAM plan for PM emissions from this unit that are controlled by the baghouse. The CAM plan should include a maximum and minimum pressure drop across the baghouse as an indicator range that will assure compliance with the emissions limit.
8. Regarding your request to modify the PSD established SO<sub>2</sub> limit to match the NSPS standard of 29 ppm, as a 24-hour average, a PSD modification is not appropriate because the PSD limits and their associated

averaging times were specifically imposed to protect the ambient air quality standards. Following the approach outlined in comment 2, above, at your request, a streamlined limit could be established. However, the new limit would have to be sufficiently stringent in order to assure compliance with each of the other applicable requirements. It is not immediately clear that a 29 ppm limit averaged over 24 hours will assure compliance with 3-hour and 6-hour limits which were established by the PSD permit (presumably to protect the ambient air quality standards). Because compliance with the SO<sub>2</sub> limits is demonstrated through the use of a continuous emissions monitor, there may not be any real need to alter these limits. If you do wish to establish a streamlined limit pursuant to rule 62-440(1), F.A.C., please provide a request that we do so and a thorough explanation of how the streamlined limit that you wish to request will assure compliance with all of the applicable SO<sub>2</sub> limits for this unit.

9. Regarding your request to amend the PSD established limits for CO to match the limits imposed by the NSPS standards, a PSD modification is not appropriate because the PSD limits and their associated averaging times were specifically imposed to protect the ambient air quality standards. It should be noted that the PSD standards for CO of 400 ppm averaged over 1-hour and 100 ppm averaged over 4-hours are not specifically listed in the current Title V permit. As applicable requirements, they will need to be specifically stated in the Title V renewal permit along with the NSPS standard of 100 ppm averaged over 4 hours. Following the approach outlined in comment 2, above, at your request, a streamlined limit could be established. As with the SO<sub>2</sub> limits, it is not immediately apparent that the 100 ppm CO limit averaged over 4 hours will assure compliance with the PSD limit of 400 ppm averaged over 1 hour. If you wish to establish a streamlined limit pursuant to rule 62-440(1), F.A.C., please provide a request that we do so and a thorough explanation of how the streamlined limit that you wish to request will assure compliance with all of the applicable CO limits for this unit.
10. Regarding your request to amend the PSD established limits for PM to match the limits imposed by the NSPS standards; we believe that a streamlined limit could be developed in the Title V permit without opening the PSD permit. It appears that compliance with the NSPS standard should assure compliance with the PSD standard. It should be noted that the PSD standard for PM of 0.0150 grains/dscf corrected to 12% CO<sub>2</sub> is not specifically listed in the current Title V permit. As an applicable requirement, it will need to be specifically stated in the Title V renewal permit along with the NSPS standard of 27 milligrams per dry standard cubic meter, corrected to 7 percent oxygen. If you wish to establish a streamlined limit pursuant to rule 62-440(1), F.A.C., please provide a request that we do so and, considering the differences between the standards in the oxygen correction factor and the CO<sub>2</sub> correction factor, a thorough explanation of how the streamlined limit that you wish to request will assure compliance with all of the applicable PM limits for this unit.
11. Your request to modify Specific Condition 2.c. of the PSD-FL-127 to alter the baghouse temperature to match the federal language does not appear to be an appropriate change. The federal requirement to limit the maximum baghouse inlet temperature to no more than 17° C above the baghouse temperature during the latest dioxin/furan test is a requirement that helps assure that dioxin/furan emissions remain roughly the same as were measured during the test. The initial condition that was part of the Site Certification that helped to assure compliance with the dioxin/furan limit was the requirement to maintain the furnace at an average temperature no less than 1800 °F. This requirement was removed from the Title V permit by a revision issued July 2, 2002. Further research will be conducted to determine if the basis for this requirement was properly removed as an applicable requirement. If not, then it must be placed back into the Title V permit renewal as an existing applicable requirement, but at your request, could be a candidate for a new streamlined requirement, as discussed above. The requirement that the acid gas control system be capable of cooling flue gasses to an average temperature not exceeding 300 °F appears to be a way to assure that lead emissions are adequately captured by the baghouse, and do not pass through as vapors. Although this requirement is repeated in the PSD permit, it appears to have originated as a condition of the Site Certification. Therefore, it may not be altered simply by changing the PSD permit. In addition, while this requirement is contained in

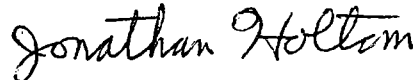
the Site Certification and repeated in the PSD permit, it currently is not reflected in the Title V permit. As an applicable requirement, it will need to be clearly reflected in the renewed Title V permit.

12. Your request to include the more recent language of 40 CFR 60.58b extending the startup, shut down and malfunction period to 15 hours for CO can be satisfied by amending the language in the Title V permit. This will not conflict with the original PSD permit because it did not impose limits to the duration of excess emissions.
13. Your request to include the more recent language of 40 CFR 60.7 regarding the submission of excess emissions reports on a semi-annual basis instead of a quarterly basis is already contained in Specific Condition A.70. A PSD change does not appear to be needed since the current Title V permit contains the more recent language of the same rule that was cited in the original PSD permit.

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

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

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Mr. John Power

Street  
or P

Pasco County Resource Recovery Facility  
14230 Hays Road

City

Spring Hill, Florida 34610

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