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SEP 14 2006

BUREAU OF AIR REGULATION

September 8, 2006

Mr. Jonathan Holtom, P.E.
North Permitting Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Pasco County Resource Recovery Facility
Response to Fourth Request for Additional Information

Dear Mr. Holtom:

Pasco County is in receipt of your letter dated July 5, 2006 requesting additional information related to the County's application to renew the Title V Operating Permit for the Pasco County Resource Recovery Facility. On behalf of the County, CDM hereby provides the following responses to the requested information:

1. *A CAM plan will need to be included in the permit for the incinerators for the controlled emissions of particulate matter (PM). Your recent response contains the statement that monitoring the baghouse pressure differential is not appropriate due to the size and operational nature of the baghouses. As an alternative, you have proposed to use the COMS as the sole monitored parameter, with an excursion defined as a COMS reading greater than 10%. Although the use of a COMS is presented in EPA's technical guidance document for CAM, our experience has shown that, for combustion sources, there is not a conclusive and reliable relationship between measured opacity and actual PM emissions. In order for us to approve the use of your COMS as the sole monitored parameter, we will need for you to submit at least the five most recent years' PM stack test results (15 test runs) along with the opacity readings that were recorded during those test runs in order to establish an acceptable excursion range. It should be noted that, since the opacity limits for these sources is 10% on a 6-minute average, setting the excursion range at 10% would result in a recorded violation of the opacity limit every time that an excursion is experienced.*

Response: To alleviate the level of effort that will be necessary to continuously monitor and track opacity readings as a CAM plan for PM, the County and their contract operator, Covanta Pasco, Inc. are willing to accept a new "most stringent" limitation for that pollutant. Attachment 2 in our letter to you dated September 6, 2005 provided a comparison of the emission limits imposed in PSD-FL-127A (which is CAM applicable) to the emission limits imposed by 40 CFR 60 Subpart Cb (which is CAM exempt). As shown in that document, which is attached for convenience, the PM emission limitation of 27 mg/dscm @ 7% O₂



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(Subpart Cb) is more stringent than the PM emission limitation of 0.015 gr/dscf @ 12% CO₂ (PSD). Accordingly, Pasco County requests that the PSD permit be amended to impose the more stringent limitation of 27 mg/dscm @ 7% O₂.

2. In addition to the test data, please submit a CAM plan for each of the units utilizing the format contained in the sample CAM plans posted on EPA's CAM page, especially the monitoring approach table that will be taken from the application and placed into the permit.

Response: As stated above, Pasco County is willing to accept the more stringent post-1990 PM standard into the PSD permit, thus negating the need for a CAM Plan.

Thank you for your consideration of these responses. If further additional information is needed, or if you would like to discuss these responses, please do not hesitate to contact me at (813) 281-2900.

Very truly yours,

Jason M. Gorrie, P.E.

Principal

Camp Dresser & McKee Inc.

cc: John Power, Pasco County
Viet Ta, Covanta Pasco, Inc.

ATTACHMENT 2
Comparison of Emission Limitations

	PSD-FL-127A	Stack Test Conditions			Mass Emission Rate (lb/hr)
		airflow ¹ (dscfm)	%O ₂ ² (%)	%CO ₂ (%)	
PM	0.015 gr/dscf @ 12% CO2	52422	11.48	8.3	9.74
SO2	104 ppm @ 7% O2	52422	11.48	8.3	80.26
	60 ppm @ 7% O2	52422	11.48	8.3	46.31
NOx	0.643 lb/MMBtu	52422	11.48	8.3	90.02
CO	400 ppm @ 7% O2	52422	11.48	8.3	134.96
	100 ppm @ 7% O2	52422	11.48	8.3	33.74
VOC	0.021 lb/MMBtu	52422	11.48	8.3	2.94
Pb	0.0007 lb/MMBtu	52422	11.48	8.3	9.80E-02
FI	0.008 lb/MMBtu	52422	11.48	8.3	1.12
Be	1.35E-07 lb/MMBtu	52422	11.48	8.3	1.89E-05
Hg	0.0008 lb/MMBtu	52422	11.48	8.3	1.12E-01

	40 CFR 60 Subpart Cb	Stack Test Conditions			Mass Emission Rate (lb/hr)
		airflow ¹ (dscfm)	%O ₂ ² (%)	%CO ₂ (%)	
PM	27 mg/dscm @ 7% O2	52422	11.48	8.3	7.81
SO2	29 ppm @ 7% O2	52422	11.48	8.3	22.38
NOx	205 ppm @ 7% O2	52422	11.48	8.3	113.62
CO	100 ppm @ 7% O2	52422	11.48	8.3	33.74
Pb	0.44 mg/dscm @ 7% O2	52422	11.48	8.3	0.13
Cd	0.04 mg/dscm @ 7% O2	52422	11.48	8.3	0.01
Hg	0.07 mg/dscm @ 7% O2	52422	11.48	8.3	0.02
HCl	29 mg/dscm @ 7% O2	52422	11.48	8.3	12.74

Note: Specific Condition No. 1.a. limits the heat input to the furnace to 140 MMBtu/hr

¹ average of all isokinetic runs on all 3 units during last stack test

² average of all RATA runs for the past year