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October 1, 2007

Ms. Trina L. Vielhauer, Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Request for Title V Permit Revision
Title V Permit No. 1010056-005-AV

Dear Ms. Vielhauer:

On May 10, 2006, the United States Environmental Protection Agency (USEPA) modified the New Source Performance Standards (NSPS) and associated Emission Guidelines (EG) for Large Municipal Waste Combustors. On May 11, 2007, your Department adopted these revisions into Chapter 62-204, effective May 31, 2007. The Pasco County Resource Recovery Facility is affected by these changes. Accordingly, CDM on behalf of Pasco County hereby requests a revision of the subject Title V permit to incorporate applicable provisions of the revised rule.

We have identified the permit conditions affected by the revision and the necessary changes. For your convenience, attached is a list of the revised conditions with words deleted by ~~strikethrough~~ and words added by underline.

We trust that this information is sufficient for the Department to revise the facility's permit. If additional information is needed, please do not hesitate to contact either myself at (813) 281-2900 or Mr. John Power with Pasco County at (727) 856-0119.

Very truly yours,

Jason M. Gorrie, P.E.
Principal
Camp Dresser & McKee Inc.

c: Viet Ta (Covanta Pasco, Inc.)
John Power, Pasco County

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PERMIT CONDITIONS AFFECTED BY THE REVISION AND THE NECESSARY CHANGES

Operating Practices and Requirements

A.11. Operating Requirements. The procedures specified in paragraphs (1) through (12) shall be used for determining compliance with the operating requirements under 40 CFR 60.53b.

(3) The owner or operator of an affected facility shall install, calibrate, maintain, and operate a continuous emission monitoring system for measuring carbon monoxide at the combustor outlet and record the output of the system and shall follow the procedures and methods specified in paragraphs(i) through(iii).

> (ii) During each relative accuracy test run of the continuous emission monitoring system required by Performance Specification 4A in appendix B of 40 CFR 60, carbon monoxide and oxygen (or carbon dioxide) data shall be collected concurrently (or within a 30- to 60-minute period) by both the continuous emission monitors and the test methods specified in paragraphs (A) and(B). For affected facilities subject to the 100 parts per million dry volume carbon monoxide standard, the relative accuracy criterion of 5 parts per million dry volume is calculated as the absolute value of the mean difference between the reference method and continuous emission monitoring systems.

(8) The maximum demonstrated municipal waste combustor unit load shall be determined during the initial performance test for dioxins/furans and each subsequent performance test during which compliance with the dioxin/furan emission limit specified in 40 CFR 60.52b(c) is achieved. The maximum demonstrated municipal waste combustor unit load shall be the highest 4-hour arithmetic average load achieved during four consecutive hours during the most recent test during which compliance with the dioxin/furan emission limit was achieved. If a subsequent dioxin/furan performance test is being performed on only one affected facility at the MWC plant, as provided in 40 CFR 60.58b(g)(5)(iii), the owner or operator may elect to apply the same maximum municipal waste combustor unit load from the tested facility for all similarly designed and operated affected facilities at the MWC plant.

(9) For each particulate matter control device employed at the affected facility, the maximum demonstrated particulate matter control device temperature shall be determined during the initial performance test for dioxins/furans and each subsequent performance test during which compliance with the dioxin/furan emission limit specified in 40 CFR 60.52b(c) is achieved. The maximum demonstrated particulate matter control device temperature shall be the highest 4-hour arithmetic average temperature achieved at the particulate matter control device inlet during four consecutive hours during the most recent test during which compliance with the dioxin/furan limit was achieved. If a subsequent dioxin/furan performance test is being performed on only one affected facility at the MWC plant, as provided in 40 CFR 60.58b(g)(5)(iii), the owner or operator may elect to apply the same maximum particulate matter control device temperature from the tested facility for all similarly designed and operated affected facilities at the MWC plant.

(10) At a minimum, valid continuous emission monitoring system hourly averages shall be obtained as specified in paragraphs (i) and (ii) for ~~75 percent of the operating hours per day for 90 percent of the operating days per calendar quarter~~ at least 90 percent of the operating hours per calendar quarter and 95 percent of the operating hours per calendar year that the affected facility is combusting municipal solid waste.

Operator Training and Certification

A.12. ~~Standards for municipal waste combustor operator training and certification.~~
~~(2) If one of the persons listed in paragraph (c) must leave the affected facility during their operating shift, a provisionally certified control room operator who is onsite at the affected facility may fulfill the requirement in paragraph (c).~~ If both the certified chief facility operator and certified shift supervisor are unavailable, a provisionally certified control room operator on site at the municipal waste combustion unit may fulfill the certified operator requirement. Depending on the length of time that a certified chief facility operator and certified shift supervisor are away, the owner or operator of the affected facility must meet one of three criteria:

(i) When the certified chief facility operator and certified shift supervisor are both off site for 12 hours or less, and no other certified operator is on site, the provisionally certified control room operator may perform the duties of the certified chief facility operator or certified shift supervisor.

(ii) When the certified chief facility operator and certified shift supervisor are off site for more than 12 hours, but for two weeks or less, and no other certified operator is on site, the provisionally certified control room operator may perform the duties of the certified chief facility operator or certified shift supervisor without notice to, or approval by, the Administrator. However, the owner or operator of the affected facility must record the period when the certified chief facility operator and certified shift supervisor are off site and include that information in the annual report as specified under § 60.59b(g)(5).

(iii) When the certified chief facility operator and certified shift supervisor are off site for more than two weeks, and no other certified operator is on site, the provisionally certified control room operator may perform the duties of the certified chief facility operator or certified shift supervisor without approval by the Administrator. However, the owner or operator of the affected facility must take two actions:

(A) Notify the Administrator in writing. In the notice, state what caused the absence and what actions are being taken by the owner or operator of the facility to ensure that a certified chief facility operator or certified shift supervisor is on site as expeditiously as practicable.

(B) Submit a status report and corrective action summary to the Administrator every four weeks following the initial notification. If the Administrator provides notice that the status report or corrective action summary is disapproved, the municipal waste combustion unit may continue operation for 90 days, but then must cease operation. If corrective actions are taken in the 90-day period such that the Administrator withdraws the disapproval, municipal waste combustion unit operation may continue.

(3) A provisionally certified operator who is newly promoted or recently transferred to a shift supervisor position or a chief facility operator position at the municipal waste combustion unit may perform the duties of the certified chief facility operator or certified shift supervisor without notice to, or approval by, the Administrator for up to six months before taking the ASME QRO certification exam.

Excess Emissions

A.35. Startup, Shutdown and Malfunction. The provisions for startup, shutdown, and malfunction are provided in paragraph (1).
(1) The standards under 40 CFR 60, Subpart Cb, as incorporated in Rule 62-204.800(8)(b), F.A.C., apply at all times except during periods of startup, shutdown, or malfunction. Duration of startup or shutdown periods are limited to 3 hours per occurrence, except as provided in condition A.35.(1)(iii) of this section. During periods of startup, shutdown, or malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7).

(iii) For the purpose of compliance with the carbon monoxide emission limits in Sec. 60.53b (a), if a loss of boiler water level control (e.g., boiler waterwall tube failure) or a loss of combustion air control (e.g., loss of combustion air fan, induced draft fan, combustion grate bar failure) is determined to be a malfunction, the duration of the malfunction period is limited to 15 hours per occurrence. During such periods of malfunction, monitoring data shall be dismissed or excluded from compliance calculations, but shall be recorded and reported in accordance with the provisions of 40 CFR 60.59b(d)(7).

Test Methods and Procedures

Particulate Matter and Opacity

A.39. The procedures and test methods specified in paragraphs (1) through (11) shall be used to determine compliance with the emission limits for particulate matter and opacity.

(3) The EPA Reference Method 5 shall be used for determining compliance with the particulate matter emission limit. The minimum sample volume shall be 1.7 cubic meters. The probe and filter holder heating systems in the sample train shall be set to provide a gas temperature no greater than

160 ~~±14~~ □C. An oxygen or carbon dioxide measurement shall be obtained simultaneously with each Method 5 run.

(9) Following the date that the initial performance test for particulate matter is completed or is required to be completed under 40 CFR 60.8 for an affected facility, the owner or operator shall conduct a performance test for particulate matter on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests within each 5-year calendar period).~~an annual basis (no more than 12 calendar months following the previous performance test).~~

(11) Following the date that the initial performance test for opacity is completed or is required to be completed under 40 CFR 60.8 for an affected facility, the owner or operator shall conduct a performance test for opacity on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests within each 5-year calendar period).~~an annual basis (no more than 12 calendar months following the previous performance test).~~

Cadmium, Lead and Mercury

A.40. The procedures and test methods specified in paragraphs (1) and (2) shall be used to determine compliance with the emission limits for cadmium, lead, and mercury.

(1) The procedures and test methods specified in paragraphs (1)(i) through (1)(ix) shall be used to determine compliance with the emission limits for cadmium and lead.

> (vii) Following the date that the initial performance test for mercury is completed or is required to be completed under 40 CFR 60.8, the owner or operator of an affected facility shall conduct a performance test for compliance with the emission limits for cadmium and lead mercury emissions on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests within each 5-year calendar period).~~an annual basis (no more than 12 calendar months following the previous performance test).~~

(2) The procedures and test methods specified in paragraphs (2)(i) through (2)(xi) shall be used to determine compliance with the mercury emission limit.

> (ix) Following the date that the initial performance test for mercury is completed or is required to be completed under 40 CFR 60.8, the owner or operator of an affected facility shall conduct a performance test for mercury emissions on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests within each 5-year calendar period).~~an annual basis (no more than 12 calendar months following the previous performance test).~~

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Sulfur Dioxide

A.42. The procedures and test methods specified in paragraphs (1) through (14) shall be used for determining compliance with the sulfur dioxide emission.

(7) At a minimum, valid continuous monitoring system hourly averages shall be obtained as specified in paragraphs (7)(i) and (7)(ii) for ~~75 percent of the operating hours per day for 90 percent of the operating days per calendar quarter~~ 90 percent of the operating hours per calendar quarter and 95 percent of the operating days per calendar year that the affected facility is combusting municipal solid waste.

(12) The continuous emission monitoring system shall be operated according to Performance Specification 2 in 40 CFR 60, Appendix B. For sources that have actual inlet emissions less than 100 parts per million dry volume, the relative accuracy criterion for inlet sulfur dioxide continuous emission monitoring systems should be no greater than 20 percent of the mean value of the reference method test data in terms of the units of the emission standard, or 5 parts per million dry volume absolute value of the mean difference between the reference method and the continuous emission monitoring systems, whichever is greater.

Dioxins/Furans

A.44. The procedures and test methods specified in paragraphs (1) through (10) shall be used to determine compliance with the limits for dioxin/furan emissions.

(5) Following the date that the initial performance test for dioxins/furans is completed or is required to be completed under 40 CFR 60.8, the owner or operator of an affected facility shall conduct performance tests for dioxin/furan emissions in accordance with paragraph (3), according to one of the schedules specified in paragraphs (i) through (iii).

> (i) For affected facilities, performance tests shall be conducted on an annual basis ~~(no more than 12 calendar months following the previous performance test.)~~ (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests in each 5-year calendar period).
>
> (ii) ~~[reserved]~~ For the purpose of evaluating system performance to establish new operating parameter levels, testing new technology or control technologies, diagnostic testing, or related activities for the purpose of improving facility performance or advancing the state-of-the-art for controlling facility emissions, the owner or operator of an affected facility that qualifies for the performance testing schedule specified in paragraph (iii), may test one unit for dioxin/furan and apply the dioxin/furan operating parameters to similarly designed and equipped units on site by meeting the requirements specified in paragraphs (A) through (D).

(A) Follow the testing schedule established in paragraph (iii). For example, each year a different affected facility at the municipal waste combustor plant shall be tested, and the affected facilities at the plant shall be tested in sequence (*e.g.*, unit 1, unit 2, unit 3, as applicable).

(B) Upon meeting the requirements in paragraph (iii) for one affected facility, the owner or operator may elect to apply the average carbon mass feed rate and associated carbon injection system operating parameter levels for dioxin/furan as established in 40 CFR 60.58b(m) to similarly designed and equipped units on site.

(C) Upon testing each subsequent unit in accordance with the testing schedule established in paragraph (iii), the dioxin/furan and mercury emissions of the subsequent unit shall not exceed the dioxin/furan and mercury emissions measured in the most recent test of that unit prior to the revised operating parameter levels.

(D) The owner or operator of an affected facility that selects to follow the performance testing schedule specified in paragraph (iii) and apply the carbon injection system operating parameters to similarly designed and equipped units on site shall follow the procedures specified in 40 CFR 60.59b(g)(4) for reporting.

(iii) Where all performance tests over a 2-year period indicate that dioxin/furan emissions are less than or equal to 15 nanograms per dry standard cubic meter (total mass) for all affected facilities located within a municipal waste combustor plant, the owner or perator of the municipal waste combustor plant may elect to conduct annual performance tests for one affected facility (i.e., unit) per year at the municipal waste combustor plant. At a minimum, a performance test for dioxin/furan emissions shall be conducted annually ~~(no more than 12 months following the previous performance test)~~ (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests in each 5-year calendar period) for one affected facility at the municipal waste combustor plant. Each year a different affected facility at the municipal waste combustor plant shall be tested, and the affected facilities at the plant shall be tested in sequence (e.g., unit 1, unit 2, unit 3, as applicable). If each annual performance test continues to indicate a dioxin/furan emission level less than or equal to 15 nanograms per dry standard cubic meter (total mass), the owner or operator may continue conducting a performance test on only one affected facility per year. If any annual performance test indicates a dioxin/furan emission level greater than 15 nanograms per dry standard cubic meter (total mass), performance tests thereafter shall be conducted annually on all affected facilities at the plant until and unless all annual performance tests for all affected facilities at the plant over a 2-year period indicate a dioxin/furan emission level less than or equal to 15 nanograms per dry standard cubic meter (total mass).

Nitrogen Oxides

A.45. The procedures and test methods specified in paragraphs (1) through (12) shall be used to determine compliance with the nitrogen oxides emission limit for affected facilities under Sec. 60.52b(d).

(6) At a minimum, valid continuous emission monitoring system hourly averages shall be obtained as specified in paragraphs (i) and (ii) for ~~75 percent of the operating hours per day for 90 percent of the operating days per calendar quarter~~ 90 percent of the operating hours per calendar quarter and for 95 percent of the operating hours per calendar year that the affected facility is combusting municipal solid waste.

(12) When nitrogen oxides continuous emissions data are not obtained because of continuous emission monitoring system breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data shall be obtained using other monitoring systems as approved by the Administrator or EPA Reference Method 19 to provide, as necessary, valid emissions data for a minimum of ~~75 percent of the hours per day for 90 percent of the days per calendar quarter~~ 90 percent of the operating hours per calendar quarter and for 95 percent of the operating hours per calendar year the unit is operated and combusting municipal solid waste.

Monitoring Requirements

A.67. The owner or operator of an affected facility shall install, calibrate, maintain, and operate a continuous emission monitoring system and record the output of the system for measuring the oxygen or carbon dioxide content of the flue gas at each location where carbon monoxide, sulfur dioxide, or nitrogen oxides emissions are monitored and shall comply with the test procedures and test methods specified in paragraphs (1) through (~~7~~8).

(8) During a loss of boiler water level control or loss of combustion air control malfunction period as specified in 40 CFR 60.58b(a)(1)(iii), a diluent cap of 14 percent for oxygen or 5 percent for carbon dioxide may be used in the emissions calculations for sulfur dioxide and nitrogen oxides.

Recordkeeping and Reporting Requirements

A.75. The owner or operator of an affected facility subject to the standards under 40 CFR 60.53b, 60.54b, and 60.55b shall maintain records of the information specified in paragraphs (1) through (15), as applicable, for each affected facility for a period of at least 5 years.

(12) The records specified in paragraphs (i) through (~~ii~~iv).

(iv) Records of when a certified operator is temporarily off site. Include two main items:

(A) If the certified chief facility operator and certified shift supervisor are off site for more than 12 hours, but for 2 weeks or less, and no other certified operator is on site, record the dates that the certified chief facility operator and certified shift supervisor were off site.

(B) When all certified chief facility operators and certified shift supervisors are off site for more than 2 weeks and no other certified operator is on site, keep records of four items:

(1) Time of day that all certified persons are off site.

(2) The conditions that cause those people to be off site.

(3) The corrective actions taken by the owner or operator of the affected facility to ensure a certified chief facility operator or certified shift supervisor is on.site as soon as practicable

(4) Copies of the written reports submitted every 4 weeks that summarize the actions taken by the owner or operator of the affected facility to ensure that a certified chief facility operator or certified shift supervisor will be on site as soon as practicable.

A.77. Following the first year of municipal combustor operation, the owner or operator of an affected facility shall submit an annual report including the information specified in paragraphs (1) through (4), as applicable, no later than February 1 of each year following the calendar year in which the data were collected (once the unit is subject to permitting requirements under Title V of the Act, the owner or operator of an affected facility must submit these reports semiannually).

(1) A summary of data collected for all pollutants and parameters regulated under this subpart, which includes the information specified in paragraphs (i) through (v).

(iv) ~~The total number of days that the minimum number of hours of data for sulfur dioxide, nitrogen oxides, carbon monoxide, municipal waste combustor unit load, and particulate matter control device temperature data were not obtained~~ The total number of hours per calendar quarter and hours per calendar year that valid data for sulfur dioxide, nitrogen oxides, carbon monoxide, municipal waste combustor unit load, or particulate matter control device temperature data were not obtained based on the data recorded under based on the data recorded under 40 CFR 60.59b(d)(6).

(v) ~~The total number of hours that data for sulfur dioxide, nitrogen oxides, carbon monoxide, municipal waste combustor unit load, and particulate matter control device temperature were excluded from the calculation of average emission concentrations or parameters~~ The total number of hours that data for sulfur dioxide, nitrogen oxides, carbon monoxide, municipal waste combustor unit load, and particulate matter control device temperature

were excluded from the calculation of average emission concentrations or parameters based on the data recorded under 40 CFR 60.59b(d)(7).

(4) A notification of intent to begin the reduced dioxin/furan performance testing schedule specified in 40 CFR 60.58b (g) (5) (iii) during the following calendar year and notification of intent to apply the average carbon mass feed rate and associated carbon injection system operating parameter levels as established in 40 CFR 60.58b(m) to similarly designed and equipped units on site.

(5) Documentation of periods when all certified chief facility operators and certified shift supervisors are off site for more than 12 hours.

Miscellaneous Requirements

Activated Carbon Injection

A.86. The owner or operator of an affected facility where activated carbon injection is used to comply with the mercury emission limit, or the dioxin/furan emission limits , or the dioxin/furan emission level specified in 40 CFR 60.58b(g)(5)(iii) shall follow the procedures specified in paragraphs (1) through (34).

(1) During the performance tests for dioxins/furans and mercury, as applicable, the owner or operator shall estimate an average carbon mass feed rate based on carbon injection system operating parameters such as the screw feeder speed, hopper volume, hopper refill frequency, or other parameters appropriate to the feed system being employed, as specified in paragraphs (i) and(ii).

(i) An average carbon mass feed rate in kilograms per hour or pounds per hour shall be estimated during the initial performance test for mercury emissions and each subsequent performance test for mercury emissions.

(ii) An average carbon mass feed rate in kilograms per hour or pounds per hour shall be estimated during the initial performance test for dioxin/furan emissions and each subsequent performance test for dioxin/furan emissions. If a subsequent dioxin/furan performance test is being performed on only one affected facility at the MWC plant, as provided in 40 CFR 60.58b (g)(5)(iii), the owner or operator may elect to apply the same estimated average carbon mass feed rate from the tested facility for all the similarly designed and operated affected facilities at the MWC plant.

(2) During operation of the affected facility, the carbon injection system operating parameter(s) that are the primary indicator(s) of the carbon mass feed rate (e.g., screw feeder setting) shall be averaged over a block 8-hour period, and the 8-hour block average must equal or exceed the level(s) documented during the performance tests specified under paragraphs (1) (i) and (1) (ii)~~.~~ , except as specified in paragraphs (i) and (ii).

(i) During the annual dioxin/furan or mercury performance test and the 2 weeks preceding the annual dioxin/furan or mercury performance test, no limit is applicable for average mass carbon feed rate if the provisions of paragraph (ii) are met.

(ii) The limit for average mass carbon feed rate may be waived in accordance with permission granted by the Administrator for the purpose of evaluating system performance, testing new technology or control technologies, diagnostic testing, or related activities for the purpose of improving facility performance or advancing the state-of-the-art for controlling facility emissions.

(3) The owner or operator of an affected facility shall estimate the total carbon usage of the plant (kilograms or pounds) for each calendar quarter by two independent methods, according to the procedures in paragraphs (i) and (ii).

(i) The weight of carbon delivered to the plant.

(ii) Estimate the average carbon mass feed rate in kilograms per hour or pounds per hour for each hour of operation for each affected facility based on the parameters specified under paragraph (1), and sum the results for all affected facilities at the plant for the total number of hours of operation during the calendar quarter.

(4) Pneumatic injection pressure or other carbon injection system operational indicator shall be used to provide additional verification of proper carbon injection system operation. The operational indicator shall provide an instantaneous visual and/or audible alarm to alert the operator of a potential interruption in the carbon feed that would not normally be indicated by direct monitoring of carbon mass feed rate (*e.g.*, continuous weight loss feeder) or monitoring of the carbon system operating parameter(s) that are the indicator(s) of carbon mass feed rate (*e.g.*, screw feeder speed). The carbon injection system operational indicator used to provide additional verification of carbon injection system operation, including basis for selecting the indicator and operator response to the indicator alarm, shall be included in 40 CFR 60.54b(e)(6) of the site-specific operating manual required under 40 CFR 60.54b(e).