



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

September 15, 2011

Sent via Electronic Mail - Read Receipt Requested
jpowers@pascocountyfl.net

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

Re: Request for Additional Information
Permit Nos. 1010056-007-AC and 1010056-008-AV
Pasco County Resource Recovery Facility
Air Construction Permit Modification and Title V Air Operation Permit Renewal

Dear Mr. Power:

On August 4, 2011, the Department received an air construction permit modification and a Title V air operation permit renewal for the existing Pasco County Resource Recovery Facility. The renewal application addresses new and existing reciprocating internal combustion engines (RICE) and streamlining permit conditions between previous prevention of significant deterioration (PSD) and Title V air operation permits.

The application is incomplete. In order to continue processing the application, the Department needs the additional information requested below. Should a response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the permit application form.

In the air construction permit and Title V permit renewal application:

1. Facility Regulatory Classifications

On page 12 Box 10: One or More Emissions Units Subject to NESHAP (40 CFR Parts 61 and 63).

Check if the facility addressed in this application has one or more emissions units subject to a standard promulgated by the U.S. Environmental Protection Agency (EPA) under section 112(d) of the Clean Air Act (40 CFR Parts 61 and 63, National Emission Standards for Hazardous Air Pollutants) as described in paragraph (f) of the definition of "Major Source of Air Pollution" or "Title V Source" as set forth in Rule 62-210.200, Florida Administrative Code (F.A.C.).

2. Previously Submitted Information

All renewal applications are required to be treated the same as an initial application for purposes of identifying and certifying compliance with all applicable requirements. For renewal applications, it is not acceptable to reference previously submitted information. To be a complete application, all information must be reviewed, updated, submitted and certified as to its accuracy. The following information is a sample of missing information from this renewal application that must be submitted. You should thoroughly review the application to ensure that all of the information necessary to validate the professional engineer's and the responsible official's certifications is included.

In Section C. Facility Additional Information, Page 15:

- a. Facility Plot Plan: A facility plot plan is required for all Title V permit renewals. Please provide a plot plan of the facility showing the location of existing and proposed manufacturing processes, control equipment, stacks, vents, identifiable sources of fugitive emissions and principal buildings.

REQUEST FOR ADDITIONAL INFORMATION

- b. Process Flow Diagram(s): A process flow diagram is required for all Title V permit renewals. Please provide a general process flow diagram or set of diagrams showing any proposed new or modified emissions units and all existing emissions units at the facility. Indicate the operating rate of each emissions unit, and identify the pathways by which raw materials and products flow from unit to unit.
- c. Precautions to Prevent Emissions of Unconfined Particulate Matter: A description of precautions to prevent emissions of unconfined particulate matter is required for all Title V permit renewals. Please identify any unconfined particulate matter emissions that may result from construction, modification or operation of the facility, and describe the precautions that will be taken to prevent or control such emissions. For purposes of this requirement, it is not necessary to quantify such emissions. Examples of reasonable precautions to control unconfined emissions of particulate matter are listed at Rule 62-296.320(4), F.A.C.

In Appendix D attachment - Suggested Revisions to Existing Title V Permit:

- 3. RICE emissions Units: Please provide the total hours of operation per year for each RICE emission unit. Also, specify how the facility is complying with the applicable subpart(s) and rules applicability for each emission unit. Please link to www.dep.state.fl.us/air/emission/engine_pump_tools.htm for engine applicability assistance.
- 4. Annual performance test for hydrogen chloride (HCl) and fugitive ash: The applicant requests a modification to the annual performance test for HCl and for fugitive ash. The current permit matches the language in 40 CFR 60, subparts Cb, and requires testing every 12 months. The applicant requests to change this test frequency to every 9 to 15 months, with five testes minimum for every 5 calendar years period. Please provide the rationale for making this change.
- 5. Monitoring requirement for fluoride: PSD-FL-127 Specific Condition 3.g and Title V specific condition A.23 states the emission limit for fluoride compounds. The applicant requests that this condition be removed from both PSD and Title V Permit. Please provide the historical stack test data indicating that fluoride is emitted at a rate that is less than the applicable PSD significant emissions threshold.
- 6. Monitoring requirements for volatile organic compounds (VOC): PSD-FL-127 Specific Condition 3.e states the emission limit for VOC. The applicant requests that this condition be removed from both PSD and Title V Permit. Please provide the historical stack test data indicating that VOC is emitted at a rate that is less than the applicable PSD significant emissions threshold.

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 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. Rule 62-4.055(1), F.A.C., also 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 should have any questions, feel free to contact Yousry (Joe) Attalla, by telephone at (850) 717-9078 or by e-mail at yousry.attalla@dep.state.fl.us.

Sincerely,



Gregory P. DeAngelo, P.E.
Office of Permitting & Compliance
Administrator, Chemicals & Combustion Key Industry Group

GPD/yha

REQUEST FOR ADDITIONAL INFORMATION

This letter was sent to the following people by electronic mail with received receipt requested.

Mr. John Power, Solid Waste Manager: jpower@pascocountyfl.net

Mr. Viet Ta, Covanta Lake II, Inc.: vta@covantaenergy.com

Mr. Jason Gorrie, P.E., Covanta Energy: jgorrie@covantaenergy.com

Mr. Bill Crellin, Camp Dresser McKee: crellinwr@cdm.com

Ms. Cindy Zhang-Torres, P.E., DEP SWD: Zhang-Torres@dep.state.fl.us

Ms. Katy Forney, U.S. EPA Region 4: forney.kathleen@epa.gov

Ms. Ana Oquendo, U.S. EPA Region 4: oquendo.ana@epa.gov

Ms. Lynn Scarce, DEP OPC: lynn.scarce@dep.state.fl.us (for reading file)

Scearce, Lynn

From: Scearce, Lynn
Sent: Thursday, September 15, 2011 9:08 AM
To: 'jpower@pascocountyfl.net'
Cc: Attalla, Yousry; 'vta@covantaenergy.com'; 'jgorrie@covantaenergy.com'; 'crellinwr@cdm.com'; Zhang-Torres (Cindy.Zhang-Torres@dep.state.fl.us); 'forney.kathleen@epa.gov'; 'oquendo.ana@epa.gov'; Scearce, Lynn; Friday, Barbara; DeAngelo, Gregory
Subject: 1010056-007-AC and 1010056-008-AV , Pasco County Resource Recovery, Request for Additional Information
Attachments: 1010056-007-AC and 008-AV , Pasco County Resource Recovery RAI.pdf

Tracking:	Recipient	Delivery	Read
	'jpower@pascocountyfl.net'		
	Attalla, Yousry	Delivered: 9/15/2011 9:08 AM	Read: 9/15/2011 9:12 AM
	'vta@covantaenergy.com'		
	'jgorrie@covantaenergy.com'		
	'crellinwr@cdm.com'		
	Zhang-Torres (Cindy.Zhang-Torres@dep.state.fl.us)	Delivered: 9/15/2011 9:08 AM	
	'forney.kathleen@epa.gov'		
	'oquendo.ana@epa.gov'		
	Scearce, Lynn	Delivered: 9/15/2011 9:08 AM	Read: 9/15/2011 9:08 AM
	Friday, Barbara	Delivered: 9/15/2011 9:08 AM	Read: 9/15/2011 9:14 AM
	DeAngelo, Gregory	Delivered: 9/15/2011 9:08 AM	

Dear Mr. Power:

Attached is a **Request for Additional Information** for the project referenced above. The Permit project document addressed in this email may require immediate action within a specified time frame. Please open and review the document as soon as possible, and verify that it is accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the document or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Note: We must receive verification that you are able to access the document. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document.

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <<http://www.adobe.com/products/acrobat/readstep.html>> .

Regards,
Lynn Scearce
Office of Permitting and Compliance (OPC)
Division of Air Resources Management
850-717-9025

Scearce, Lynn

From: Gorrie, Jason [jgorrie@CovantaEnergy.com]
To: Scearce, Lynn
Sent: Thursday, September 15, 2011 9:08 AM
Subject: Read: 1010056-007-AC and 1010056-008-AV , Pasco County Resource Recovery, Request for Additional Information

Your message was read on Thursday, September 15, 2011 9:08:14 AM (GMT-05:00) Eastern Time (US & Canada).

Scearce, Lynn

From: Ta,Viet [VTa@CovantaEnergy.com]
To: Scearce, Lynn
Sent: Thursday, September 15, 2011 9:12 AM
Subject: Read: 1010056-007-AC and 1010056-008-AV , Pasco County Resource Recovery, Request for Additional Information

Your message was read on Thursday, September 15, 2011 9:12:15 AM (GMT-05:00) Eastern Time (US & Canada).