

12-

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PASCO COUNTY,

Petitioner,

v.

DEP Draft Permit No. 1010056-002-AV
OGC Case No. 99-1851

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondent.

NOTICE OF PASCO COUNTY'S WAIVER OF
EXTENSION OF TIME TO FILE PETITION

Petitioner, Pasco County (the "County"), pursuant to Rule 28-106.111(3), Florida Administrative Code, respectfully waives its right to an extension of time to file a petition for a formal administrative hearing concerning the Florida Department of Environmental Protection's ("Department") revised draft Title V air operation permit for the County's Resource Recovery Facility (DEP Permit No. 1010056-002-AV) (the "Revised Draft Permit").

1. The County is the applicant for a Title V air operation permit for the County's Resource Recovery Facility (the "Facility"), which is located at 14230 Hayes Road, Spring Hill, Florida.

2. On May 23, 2000, the Department distributed its "Intent to Issue Title V Air Operation Permit" and the Revised Draft Permit for the Facility. As the applicant for the Revised Draft Permit, the County is affected by the Department's proposed action.

3. The County requested and the Department granted several extensions of time to file a petition concerning the Revised Draft Permit. The County requested an additional 30 day extension of time August 30, 2000, which is still pending.

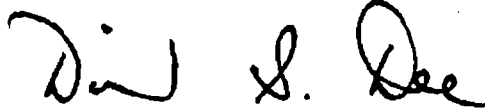
4. The County has resolved all of its issues with the Department concerning the Revised Draft Permit. Accordingly, the County hereby waives the remaining portion of the requested extension of time to file a petition. In addition, the County requests that the Department issue Permit No. 1010056-002-AV.

5. The County's counsel has discussed this request with Mr. Scott Sheplak on the Department's staff and Mr. Sheplak indicated that he does not object to this request.

WHEREFORE, the County waives its right to file a petition for a formal administrative hearing concerning the Revised Draft Permit and requests that the Department issue the subject permit.

Respectfully submitted this 1st day of September, 2000.

LANDERS & PARSONS

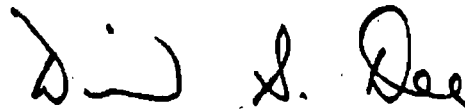


DAVID S. DEE
Florida Bar No. 281999
JOHN T. LaVIA, III
Florida Bar No. 853666
31C West College Avenue (32301)
Post Office Box 271
Tallahassee, Florida 32302
Phone: 850/681-0311
FAX: 850/224-5595

ATTORNEYS FOR PASCO COUNTY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and one copy of the foregoing was furnished by hand-delivery to the CLERK'S OFFICE, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Room 659, Tallahassee, Florida 32399; and a copy to Douglas Beason, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399, on this 1st day of September, 2000.



ATTORNEY

cc: Scott Sheplak
Dan Strobridge
Doug Bramlett
Vince Manella

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

PASCO COUNTY,

Petitioner,

v.

DEP Draft Permit No.1010056-002-AV
OGC Case No. 99-1851

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

PASCO COUNTY'S FOURTH REQUEST FOR
EXTENSION OF TIME TO FILE PETITION

Petitioner, Pasco County (the "County"), pursuant to Rule 28-106.111(3), Florida Administrative Code, respectfully requests the Department of Environmental Protection ("Department") to grant the County an additional extension of time to file a petition for formal administrative hearing concerning the Department's revised draft Title V air operation permit for the County's Resource Recovery Facility (DEP Permit No. 1010056-002-AV) (the "Revised Draft Permit"). In support of this request, the County says:

1. The County is the applicant for a Title V air operation permit for the County's Resource Recovery Facility (the "Facility"), which is located at 14230 Hayes Road, Spring Hill, Florida.

2. On May 23, 2000, the Department distributed its "Intent to Issue Title V Air Operation Permit" and the Revised Draft Permit for the Facility. As the applicant for the Revised Draft

Permit, the County is affected by the Department's proposed action.

3. On June 2, 2000, the County requested an extension of time to file a petition in this case. By order dated June 16, 2000, the Department granted the County's request and extended the time to file a petition to July 14, 2000. On July 14, 2000, the County requested a second extension of time to file a petition in this case and on August 9, 2000, the County requested a third extension of time to file a petition in this case. The Department has not yet issued orders concerning the County's second or third requests for extension of time.

4. The Revised Draft Permit is lengthy and complex. On July 5, 2000, the County's lead consultant, Daniel Strobridge of Camp, Dresser & McKee, Inc., filed comments concerning the Revised Draft Permit and Mr. Strobridge is working with the Department to resolve the issues raised in the comments.

5. Although the County does not expect to file a petition for a formal administrative hearing concerning the Revised Draft Permit, the County requests an extension of time, up to and including September 22, 2000, to allow the County an opportunity to work with the Department concerning its comments before the County waives its right to a hearing.

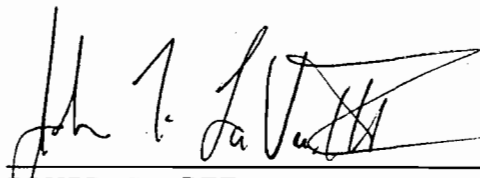
6. The County's counsel has discussed this request with Scott Sheplak of the Department's staff, and Mr. Sheplak stated that he does not believe an additional extension of time is

necessary.

WHEREFORE, the County requests the Department to grant an extension of time up to and including September 22, 2000, to file a petition for a formal administrative hearing concerning the Revised Draft Permit.

Respectfully submitted this 30th day of August, 2000.

LANDERS & PARSONS

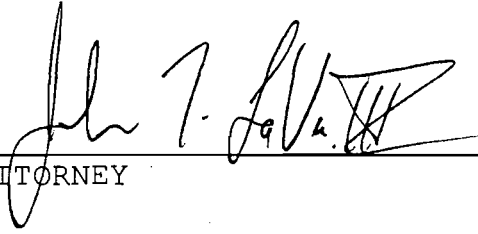
A handwritten signature in black ink, appearing to read "John T. Lavia, III", written over a horizontal line.

DAVID S. DEE
Florida Bar No. 281999
JOHN T. LAVIA, III
Florida Bar No. 853666
310 West College Avenue (32301)
Post Office Box 271
Tallahassee, Florida 32302
Phone: 850/681-0311
FAX: 850/224-5595

ATTORNEYS FOR PASCO COUNTY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and one copy of the foregoing was furnished by hand-delivery to the CLERK'S OFFICE, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Room 659, Tallahassee, Florida 32399; and by U.S. Mail to Douglas Beason, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-2400, and Scott Sheplak, Division of Air Resources Management, 2600 Blair Stone Road, Mail Station 5505, Tallahassee, Florida 32399-2400, on this 30th day of August, 2000.



ATTORNEY

Westshore Center
1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
Tel: 813 281-2900 Fax: 813 288-8787

RECEIVED

AUG 30 2000

August 29, 2000

**BUREAU OF AIR REGULATION
VIA FEDERAL EXPRESS**

Mr. Scott M. Sheplak, P.E.
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Pasco County Resource Recovery Facility
Revised DRAFT Permit No. 1010056-002-AV
Written Comments on Revised DRAFT Permit

Dear Mr. Sheplak:

On behalf of Pasco County, Camp Dresser & McKee Inc. (CDM) is providing the following additional input on the Revised DRAFT Initial Title V Air Operation Permit for the Pasco County Resource Recovery Facility (Permit No. 1010056-002-AV), received via electronic submission on August 18, 2000. Thank you for taking the time to discuss our concerns with us on August 17, 2000. Our comments are listed by condition number in the DRAFT permit, below:

Condition A.7.3.0. Operating Temperature: As discussed on August 17, 2000, Ogden Martin Systems of Pasco, Inc. will re-submit the roof temperature correlation report, signed and sealed by a registered Professional Engineer in the state of Florida. We trust that the Professional Engineer's certification will simplify the Department's review and approval of the correlation.

Condition A.11: Since Condition A.11(2) has been deleted, Condition A.11(4) should read: "The 4-hr block arithmetic average specified in paragraph (1) shall be ..."

Conditions A.26.1, A.29, and A.31: The testing frequency specified in the last sentence of these conditions should be deleted, as these pollutants are all continuously monitored.

Condition A.29: The appropriate averaging time (daily arithmetic average) should be specified as was done for other pollutants with EG limits where compliance is based on CEM measurements.

Specific Condition A.36: The phrase "in any 24 hour period" should be deleted since it is inconsistent with the Emissions Guidelines and other WTE Title V permits the Department is now finalizing (e.g., Pinellas County, Hillsborough County, and City of Tampa.) As discussed, this phrase unnecessarily restricts Condition A.35 to once in a 24-hour period. Rule 62-210.700(5), F.A.C., provides the Department with the necessary flexibility to impose only the requirements of the Emissions Guidelines with respect to excess emissions limitations.

Specific Conditions A.23 and A.24: You stated during our telephone call on August 17, 2000, that the Department's interpretation of Rule 62-297.310(a)(4)(c), F.A.C. requires an annual test for the NESHAP pollutant beryllium. Respectfully, we disagree with this interpretation. The rule clearly states: "Each NESHAP pollutant, if there is an applicable emission standard" (emphasis ours).

Mr. Scott M. Sheplak, P.E.
August 29, 2000
Page 2

Regardless of this misinterpretation, we believe that the language "unless otherwise specified by rule, order, or permit" in Rule 62-297.310(7)(a)(4) overrides the language of 62-297.310(a)(4)(c). The PSD permit for this source specifies only an initial compliance test for beryllium (and fluoride.)

Specific Condition A.71: If the Department wishes, the language "(attached)" in the second line could be changed to "of 40 CFR 60.7(d)" to avoid having to attach the form to the permit.

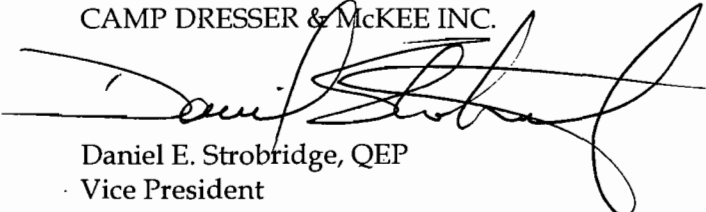
Specific Conditions B.4 and C.4: Recently, the Department concluded that RACT was not applicable to most minor particulate sources, so visible emission limits were changed to 20% (see Pinellas County RRF Title V permit). For baghouse sources, the 5% emission limit was specifically stated as a surrogate limit for deleting the requirement for Method 5 tests. If a 5% limitation is retained for this permit, then the language should be explicit that a reading greater than 5% is not a violation, but rather, requires the Department to consider whether a Method 5 test should be performed (see language in recent construction permit 0570127-003-AC dated June 5, 2000 for the City of Tampa McKay Bay facility.)

Specific Condition D.10: The language "Tier II" should probably be "Tier 2" to be consistent with the phrase "Tier 3" elsewhere in the subsection, as well as the usage in 40 CFR 60 Subpart WWW.

We greatly appreciate your and the Department's cooperation. Please feel free to call me at (813) 281-2900 if you need any clarification, or would like to arrange an additional meeting or teleconference to discuss our comments. We would like to review a copy of the proposed final permit prior to our final sign off on it.

Very truly yours,

CAMP DRESSER & MCKEE INC.


Daniel E. Strobbridge, QEP
Vice President

c: D. Bramlett, Pasco County
V. Mannella, Pasco County
D. Dee, Landers and Parsons
D. Elias, RTP
C. Hibbard, CDM
L. Brasowski, OMS Pasco
J. Gorrie, CDM



Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

Westshore Center
1715 North Westshore Boulevard, Suite 875
Tampa, Florida 33607
Tel: 813 281-2900 Fax: 813 288-8787

Barbara / File

RECEIVED

JUL 10 2000

BUREAU OF AIR REGULATION

July 5, 2000

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Pasco County Resource Recovery Facility
DRAFT Initial Title V Air Operation Permit No. 1010056-002-AV
Written Comments on DRAFT Permit

Dear Mr. Sheplak:

On behalf of Pasco County, Camp Dresser & McKee Inc. (CDM) is submitting written comments on the DRAFT Initial Title V Air Operation Permit for the Pasco County Resource Recovery Facility (Permit No. 1010056-002-AV), undated, but with a transmittal letter dated May 22, 2000. Our comments are listed by page number in the DRAFT Permit, below:

- 1. General:** We greatly appreciate the Department incorporating many of our comments on the previous DRAFT of this Permit. Our comments on this DRAFT are much briefer and many relate to a common theme. That theme relates to the incorporation of emission limits from PSD-FL-127 which are far less stringent than those contained in 40 CFR 60 Subpart Cb. In our previous comments, we had requested that the PSD emission limitations be included in the Title V Permit because the Pasco County Facility, at that time, was not subject to the emission limitations under 40 CFR 60 Subpart Cb. Now, the Pasco County Facility has completed all increments of progress and has demonstrated compliance with all emission limitations contained in 40 CFR 60 Subpart Cb. Consequently, there is no longer any need to state emission limits less stringent than those contained in 40 CFR 60 Subpart Cb in this Title V Permit.
- 2. Page 5 Condition 8b:** Please delete this reference to a vacuum street sweeper, as none is employed or available at the site.
- 3. Page 6:** An editorial change is suggested. The second paragraph, which discusses the retrofit, should be moved to the end of the section at the bottom of the page (carry over onto Page 7) entitled "Status of Compliance with Increments of Progress for Title V Permit." Also, a sentence should be added to this paragraph at the end, which states "The results of the testing demonstrated compliance with PSD -FL-127, Specific Condition 4; Rule 62-296 and Rule 62-204.800 F.A.C."

Mr. Scott M. Sheplak, P.E.

July 5, 2000

Page 2

4. **Page 6:** In the third paragraph (permitting notes) reference to NESHAP 40 CFR 61.... for Beryllium should be deleted. The Department has determined that these facilities are not subject to Beryllium NESHAP regulations.
5. **Page 8, Condition A.3 (b) (2):** Should be deleted as it is not applicable. The Department's responses to our previous comments indicated that the Department was in agreement with this comment. It simply did not get removed in this DRAFT.
6. **Page 8, Condition A.7.1.1:** Please delete the second sentence, as it conflicts with the subsequent conditions in the Permit.
7. **Page 10, Condition A.7.1.8:** In the last sentence in this condition, we are requesting that the "rolling 30 day" average be changed to a "calendar month average" based upon the Facility's truck scales. The Department has agreed to this change for the Hillsborough County WTE Facility. We are requesting language similar to that contained in the Hillsborough County WTE Title V Permit.
8. **Page 10, Condition A.7.1.9:** In the last sentence in this condition, we are requesting that the "rolling 30 day" average be changed to a "calendar month average" based upon the Facility's truck scales. The Department has agreed to this change for the Hillsborough County WTE Facility. We are requesting language similar to that contained in the Hillsborough County WTE Title V Permit.
9. **Page 11, Condition A.7.3.0:** Please add the following to the end of this condition, "as demonstrated by the furnace roof temperature thermocouple reading of at least 1,167 0 F (four-hour average). You may wish to add a permitting note indicating that temperature correlation data was provided to the Department documenting that 1,167 0 F at the roof correlates to 18000 F in the fully mixed combustion zone.
10. **Page 15, Emission limitations and Standards:** We believe that it is appropriate for Table 1-1 to be included as part of the DRAFT Permit since it has been included for other MWCs such as Pinellas County. Without it, we are not afforded the opportunity to comment on possible problems or errors.
11. **Page 15, Condition A.16.2:** Please delete this condition, because it is less stringent than Condition A.16.1, and only adds to the cost of testing. Rule 62-213.440(1), F.A.C., allows the Department to do this. It is also at variance with Condition A.87.
12. **Page 15, Condition A.17.2:** Please delete this condition, because it is less stringent than Condition A.17.1, and only adds to the cost of testing. Rule 62-213.440(1), F.A.C., allows the Department to do this. This condition is also at variance with Condition A.87.
13. **Page 16, Condition A.20:** Please delete this condition, because it is less stringent than Condition A.19, and only adds to the cost of testing. Rule 62-213.440(1), F.A.C., allows the Department to do this. This condition is also at variance with Condition A.87.

Mr. Scott M. Sheplak, P.E.
July 5, 2000
Page 3

14. **Page 16, Condition A.22:** Please delete this condition, because it is less stringent than Condition A.21, and only adds to the cost of testing. Rule 62-213.440(1), F.A.C., allows the Department to do this. This condition is also at variance with Condition A.87.
15. **Page 17, Condition A.30:** Please include the averaging time (daily arithmetic mean) in this condition.
16. **Page 17, Condition A.30:** Please delete this condition, because it is less stringent than Condition A.29, and only adds to the cost of testing. Rule 62-213.440(1), F.A.C., allows the Department to do this. This condition is also at variance with Condition A.87.
17. **Page 17, Condition A.31.2:** Please delete this condition, because it is less stringent and in conflict with Condition A.31.1 Rule 62-213.440(1), F.A.C., allows the Department to do this. This condition is also at variance with Condition A.87.
18. **Page 17, Condition A.36:** Pasco County requests that "two hours in any 24-hour period" be deleted since it is not contained in the Emission Guideline. Consequently, it is not a federally enforceable condition.
19. **Pages 26 and 27 and 16, Conditions A.23, A.24, A.25, A.47, and A.48:** Please note that the testing frequency for non-Emission Guideline pollutants from the PSD Permit (i.e., Fl, Be, and VOC) is not specified in any of these conditions. Since the PSD Permit specified testing as "initial only" for these pollutants, we are requesting a frequency of once every five years.
20. **Page 29, Condition A.55(a):** Please add "(reserved)" for the missing sections (i.e., Sections 2, 3, 6, 7, 8).
21. **Page 33, Condition A.70:** Pasco County, respectfully, requests that the Department use language from the most recent (2/99) revisions to 40 CFR 60.7. The revised language struck reference to quarterly reporting.
22. **Page 33, Condition A.71:** Like Table 1-1, we believe that it is appropriate for Figure 1. Without it, we are not afforded the opportunity to comment on possible problems or errors.
23. **Page 39, Condition A.83:** Should be deleted. The Department's responses to our previous comments indicated that the Department was in agreement with our previous request to delete it. This condition simply did not get removed in this DRAFT.
24. **Page 39, Condition A.84(b):** Due to the complexity of performing the dioxin laboratory analysis, we request that this condition be revised so that the Pasco County Facility be allowed up to 60 days to file the test report with the Department. We have again discussed this issue with Pat Comer recently, and she now agrees with this position and said 111d provides authority for it.

Mr. Scott M. Sheplak, P.E.
July 5, 2000
Page 4

25. **Page 40, Condition A.85(b) and (c):** Please revise these conditions to be consistent with our request in Comment No. 8, above to change the 30 day rolling average to a calendar month average. Also please note that the parenthesis is missing in condition A.85(a).
26. **Page 43, Condition B.8(a):** Please add "(reserved)" for the missing sections (i.e., Sections 2, 3, 6, 7, 8).
27. **Page 45, Condition C.3:** F.A.C. 62-297.310(7) does not require annual testing if there is a different testing frequency specified in the Permit. (The Permit currently requires start-up testing only).
28. **Page 46, Condition C.8(a):** Please add "(reserved)" for the missing sections (i.e., Sections 2, 3, 6, 7, 8).
29. **Page 48, Subsection D, Brief Description, first paragraph:** The third-to-last sentence in this paragraph describes how much ash has been received at the landfill between 1991 and 1999. However, the relevant information is the small amount of degradable waste (which produces gas) that has been accepted in that period. The following sentence should be added before the second-to-last sentence: "Approximately 45,390 tons (41,175 megagrams) of MSW bypass was accepted in the same period."
30. **Page 49, Condition D.5 Collection and Control System Requirements:** This condition lists the requirements in 40 CFR 60.752(b)(2)(i) through (v), which would apply if the reported NMOC emission rate exceeded 50 Mg/yr. 40 CFR 60.752(b)(2)(ii)(A) and (B) are missing from this condition and should be referenced. They are important, if this condition is going to be included in the Permit, because these missing sections describe where the system should collect gas, and the conditions under which a passive gas collection system could be used.
31. **Page 52, Condition D.11 Method for Determining Site-Specific Methane Emissions:** Replace the word "methane" with "NMOC" in the title of this condition. The condition contains a method for calculating NMOC emissions, not methane emissions.
32. **Page 53, Condition D.13:** This should be moved to the Reporting Requirements section, immediately before Condition D.16. Condition D.13. summarizes (and is repetitive of) Conditions D.5, D.16, 17 and 19. However, since it is from 40 CFR 60 Subpart Cc, and contains the incorporated references to 40 CFR 60 Subpart WWW, it should be kept.
33. **Page 53, Condition D.14:** Because this Permit is organized to contain the Reporting Requirements and the Recordkeeping Requirements in separate sections, this condition should be split into two conditions. The words, "and Recordkeeping" and ".758," should be deleted from Condition D.14. A new Condition, D.20, should be added to the Recordkeeping Requirements section, which should read: "Each owner or operator of an MSW landfill to which Rule 62-204.800(8)(c), F.A.C., applies shall comply with the Recordkeeping provisions of 40 CFR 60.758, as applicable."

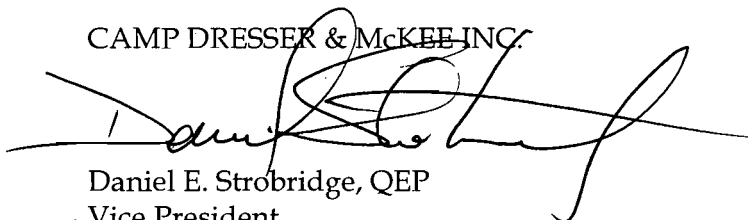
Mr. Scott M. Sheplak, P.E.
July 5, 2000
Page 5

34. **Page 53, Condition D.16 Annual NMOC Emission Rate, Subparagraph (3):** The first line in (3) contains a reference to 40 CFR 60 Subpart WWW. This should be changed to 40 CFR 60 Subpart Cc.
35. **Page 54, Condition D.18 Controlled Landfill Closure Report:** This condition should be deleted, because it will not apply unless a control system is installed. The landfill is not controlled, and Condition D.19. applies.
36. **Page 55, Condition D.20 Test Reports:** This condition should be deleted, because the Permit does not contain any requirements for compliance testing. Compliance testing would not be required unless a control system were installed.
37. **Conditions D.18 and D.20:** The Permit contains, in Condition D.5, a catchall condition for requirements that would apply if a collection and control system were installed. It would be more appropriate to cover Conditions D.18 and D.20 thereby adding the following at the end of subparagraph (2)(iv) in Condition D.5.: "and applicable provisions of 60.757, 60.758, and of Rules 62-213.440 and 62-297.310(8), F.A.C."

We greatly appreciate your consideration of these comments on the Revised DRAFT Title V Air Operation Permit for the Pasco County Resource Recovery Facility. We request that the Department issue the revised Permit conditions as DRAFT again. This would give us the opportunity to review and comment on the changes made. Please feel free to call me at (813) 281-2900 if you need any clarification, or would like to discuss these comments.

Very truly yours,

CAMP DRESSER & MCKEE INC.



Daniel E. Strobbridge, QEP
Vice President

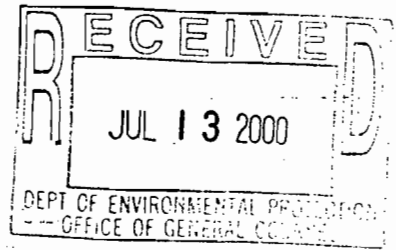
- c: J. Gallagher, Pasco County
D. Bramlett, Pasco County
V. Mannella, Pasco County
D. Elias, RTP
C. Hibbard, CDM
D. Dee, Landers and Parsons

xc: Tom Cascio

RECEIVED

JUL 14 2000

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR REGULATION



PASCO COUNTY,

Petitioner,

v.

DEP Draft Permit No. 1010056-002-AV
OGC Case No. 99-1851

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

PASCO COUNTY'S SECOND REQUEST FOR
EXTENSION OF TIME TO FILE PETITION

Petitioner, Pasco County (the "County"), pursuant to Rule 28-106.111(3), Florida Administrative Code, respectfully requests the Department of Environmental Protection ("Department") to grant the County an additional extension of time to file a petition for formal administrative hearing concerning the Department's revised draft Title V air operation permit for the County's Resource Recovery Facility (DEP Permit No. 1010056-002-AV) (the "Revised Draft Permit"). In support of this request, the County says:

1. The County is the applicant for a Title V air operation permit for the County's Resource Recovery Facility (the "Facility"), which is located at 14230 Hayes Road, Spring Hill, Florida.

2. On May 23, 2000, the Department distributed its "Intent to Issue Title V Air Operation Permit" and the Revised Draft Permit for the Facility. As the applicant for the Revised Draft

Permit, the County is affected by the Department's proposed action.

3. On June 2, 2000, the County requested an extension of time to file a petition in this case. By order dated June 16, 2000, the Department granted the County's request and extended the time to file a petition to July 14, 2000.

4. The Revised Draft Permit is lengthy and complex. On July 5, 2000, the County's lead consultant, Daniel Strobridge of Camp, Dresser & McKee, Inc., filed comments concerning the Revised Draft Permit and Mr. Strobridge is working with the Department to resolve the issues raised in the comments. Mr. Strobridge is currently out-of-town and unavailable. Accordingly, the County has not been able to determine the status of Mr. Strobridge's discussions with the Department.

5. Although the County does not expect to file a petition for a formal administrative hearing concerning the Revised Draft Permit, the County requests an additional 30-day extension of time to allow the County an opportunity to work with the Department concerning its comments before the County waives its rights to a hearing.

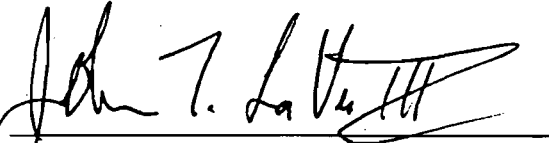
6. The County's counsel has attempted to discuss this request with Scott Sheplak, but has been unable to reach Mr. Sheplak.

WHEREFORE, the County requests the Department to grant a 30-day extension of time to file a petition for a formal

administrative hearing concerning the Revised Draft Permit.

Respectfully submitted this 13th day of July, 2000.

LANDERS & PARSONS

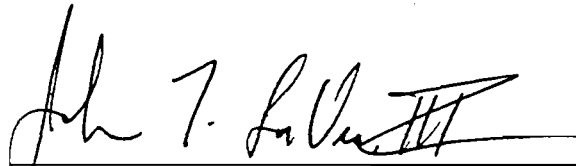


DAVID S. DEE
Florida Bar No. 281999
JOHN T. LAVIA, III
Florida Bar No. 853666
310 West College Avenue (32301)
Post Office Box 271
Tallahassee, Florida 32302
Phone: 850/681-0311
FAX: 850/224-5595

ATTORNEYS FOR PASCO COUNTY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that an original and one copy of the foregoing was furnished by hand-delivery to the CLERK'S OFFICE, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Room 659E, Tallahassee, Florida 32399; and by U.S. Mail to Douglas Beason, Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-2400, on this 13th day of July, 2000.



ATTORNEY

JUN 08 2000

PASCO COUNTY, FLORIDA



DADE CITY (352) 521-4274
LAND O' LAKES (813) 996-7341
NEW PORT RICHEY (727) 847-8145
FAX (727) 847-8064

UTILITIES SERVICES BRANCH
PUB. WKS./UTILITIES BLDG., S-213
7530 LITTLE ROAD
NEW PORT RICHEY, FL 34654-5598

June 1, 2000

Mr. C. H. Fancy, P.E.
Chief
Bureau of Air Regulation
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Revised Draft Title V Permit No.: 1010056-002-AV
Pasco County Resource Recovery Facility

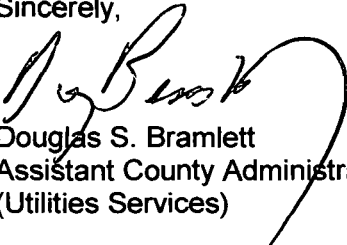
Dear Mr. Fancy:

Pursuant to the Notice of Intent to Issue Permit, enclosed please find the original Proof of Publication for the above-referenced project as required under Sections 403.815 and 403.087, Florida Statutes, and Rules 62-110.106 and 62-210.350(3), F.A.C.

We request issuance of permit as soon as the 30 (thirty) days to file petition has elapsed so that we may proceed with this project.

Your assistance is appreciated and if you have any questions, please do not hesitate to contact me at the above-listed telephone number.

Sincerely,


Douglas S. Bramlett
Assistant County Administrator
(Utilities Services)

DSB/mvw/26/fancy

Enclosure

4/13/00 cc: Tom Cascio

cc: David S. Dee, Landers & Parsons, Post Office Box 271, Tallahassee, FL 32301
Dan Strobridge, Camp Dresser & McKee, Inc., 1715 North Westshore Blvd., S-875, Tampa, FL 33607
John J. Gallagher, County Administrator
Vincent Mannella, P.E., Solid Waste Facility Manager



Douglas S. Bramlett
 Assistant County Administrator
 Utilities Services Branch
 Pasco County Govt. Complex
 Pub. Wks./Utilities Bldg., S-213
 7530 Little Road
 New Port Richey, FL 34654

Temporary Return
 Service Requested

PRESORTED
 FIRST CLASS



Mr. C. H. Fancy, P.E.
 Chief
 Bureau of Air Regulation
 Florida Department of
 Environmental Protection
 Twin Towers Office Building
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

Scott

32399+2400

