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BUREAU OF AIR REGULATION

March 31, 2000

Mr. Scott M. Sheplack, P.E.  
Administrator, Title V Section  
Florida Department of Environmental Protection  
Division of Air Resources Management  
2600 Blair Stone Road  
Mail Station #5505  
Tallahassee, Florida 32399-2400

Subject: Pasco County Title V Permit No. 1010056-002-AV

Dear Mr. Sheplack:

As discussed during your telephone conversation on February 18, 2000, with RTP Environmental Associates, Inc., Pasco County is formally requesting a change to the requirements contained in Rule 62-210.700(1), F.A.C. The current requirement in this section states:

*"Excess emissions resulting from start-up, shutdown, or malfunction of any emissions units shall be permitted provided (1) best operational practices to minimize emissions are adhered to, and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration."*

The Emission Guidelines for large MWCs, promulgated as 40 CFR 60 Subpart Cb, and adopted as Rule 62-204.800 (8)(b), F.A.C., has significantly increased the stringency of the standards applied to the facility and increased the complexity of the control equipment. This is discussed in the EPA Background Information Documents and the proposal for the Emission Guidelines, which specifically allows three hours of excess emissions for start-up, shutdown, and malfunction. This is currently embodied in Condition A.36 of the draft permit. Neither the PPSA Conditions of Certification nor the PSD permit contain the two-hour limitation (PSD-FL-127). The only mention occurs in the PSD permit on Page 7 of 13 Condition 3.j., Visible Emissions which states in part:

*"Excess emissions resulting from start-up, shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to, and the duration of excess emissions are minimized."*

It appears that there is no impediment (as defined by Pat Comer during the February 10, 2000, conference call with RTP and Pinellas County representatives) to embodying the three-hour requirement within the Title V permit.

Mr. Scott M. Sheplack

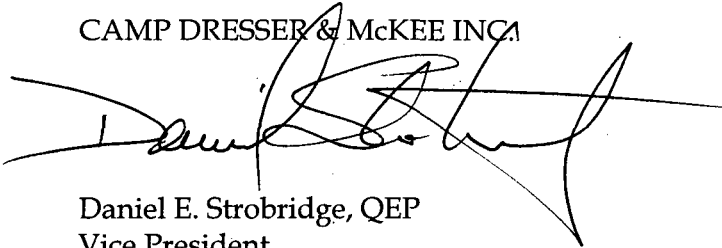
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Should you require further information or need to discuss this issue further, please feel free to contact me.

Very truly yours,

CAMP DRESSER & McKEE INC.



Daniel E. Strobbridge, QEP  
Vice President

- c: D. Bramlett, Pasco County
- V. Mannella, Pasco County
- D. Elias, RTP

xc: Tom