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BUREAU OF AIR REGULATION

Sent Federal Express

December 14, 1999

Mr. Scott M. Sheplak, P.E.
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301

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 September 27, 1999. Our comments are listed by page number in the DRAFT permit, below.

1. **General:** This draft permit does not include the existing PSD permit limits (Permit No. PSD-FL-127). These limits apply to the three MWC combustion units, and will continue to apply until they are amended/superseded by the 40 CFR 60 Subpart Cb limits when the upgraded units commence operation (by no later than April 19, 2000). Please revise this draft permit to include the PSD permit limits, which were included in both the June, 1996, Title V application, and in the revised October, 1999, Title V application.

Also, please ensure that, consistent with USEPA's March 5, 1996 "White Paper #2 for Improved Implementation of the Part 70 Operating Permit Program" and Florida Regulation (62-213.440), every permit condition that is "not federally enforceable" is identified as such throughout the document. We have attempted to identify a number of these in our comments which follow, but we have not identified all of them.

2. **Statement of Basis, first page, second paragraph, second sentence:** Please revise this sentence to say (changes underlined): "It has a nameplate rating of 1,050 tons per day of non-recycled waste at 4,800 Btu/lb, which it converts into saleable energy." The reference waste heat content is part of the definition of "nominal" operating conditions at the Facility.

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3. **Statement of Basis, first page, fourth paragraph, first sentence:** Please revise the end of the sentence to say: ["...identical in configuration, and the three provide steam to a single Turbine-Generator which has a nameplate rating of 29 MW.]
4. **Statement of Basis, first page, fifth paragraph, last sentence:** Please revise to clarify as follows: "Also please note that certain conditions in 40 CFR 60, Subpart Cb, are detailed in 40 CFR Subpart Eb."
5. **Statement of Basis, second page, third paragraph, last sentence:** Please delete the sentence that says, "The facility management has not yet received a construction schedule from OMSP." The schedule has been submitted.
6. **Page 2, Section I., Subsection A., Facility Description, second sentence:** Please make the same changes as in Comment 2.
7. **Page 2, Subsection B.:** Please add Fugitive Landfill Gas Emissions as a regulated emissions unit, as described in the revised October, 1999, Title V application. Although this landfill is primarily an ash landfill, it also accepts unprocessed solid waste, and so is subject to 40 CFR 60 Subpart Cc, Emission Guidelines for MSW Landfills.

Also please add Ash Building and Handling System as a regulated emissions unit, because 40 CFR 60 Subpart Cb contains fugitive ash emissions opacity limits (40 CFR 60.36b).

8. **Page 3, Section II., Condition 2.:** We believe that the odor standard is not federally enforceable because odor limitations are "unrelated to the purposes of the NSR program" (pursuant to USEPA's March 5, 1996 "White Paper #2 for Improved Implementation of the Part 70 Operating Permit Program") Please either delete this condition or add the words "Not federally enforceable" to this condition.

Also, please delete the word "not" in the second line; this will correct the double negative in that sentence.

9. **Page 3, Section II., Condition 4.:** Please add a permitting note that the Facility does not store any 112 (r) materials in regulated quantities.
10. **Page 3, Section II., Condition 7.:** The need for this General Pollutant Emission Limiting Standard is unclear since the footnote to the condition states that "the Department has not ordered any control devices or systems under the referenced rule." We request deletion of this "Not federally enforceable" permit condition or as an alternate, language which states: "As of the effective date of this permit, no control systems have been deemed necessary or ordered by the Department."
11. **Page 5, first paragraph:** In the first sentence, please change "29 MW" to "350 tons

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per day of waste at 4,800 Btu/lb." In the second sentence, please change "dry scrubber" to "spray dryer absorber (SDA)." In the third sentence, please delete the word "any." In the fifth sentence, please change the word "bottom" to "combined ash discharger."

12. **Page 5, fifth paragraph:** Please delete the last sentence. (See Comment No. 5.)
13. **Page 6, Condition A.3.(a), last sentence:** Please insert "four-hour average" following 103,850 pounds of steam per hours.
14. **Page 6, Condition A.3.(b):** We believe that this is unnecessary. Pasco County is willing to stipulate that it is a large MWC, in accordance with 40 CFR 60.31b and 40 CFR 60.58b(j). Please delete Paragraphs A.3.(b)(1) and (2) and amend A.3.(b) to say "The procedures specified in Condition A.5 shall be used for determining municipal unit load as defined under 40 CFR 60.51b." At minimum, please delete Condition A.3.(b)(2), because the Pasco County Facility does not have any batch-fed MWC units.
15. **Page 7, Condition A.4.:** Please delete this condition, as it merely references Condition A.51.
16. **Page 7, Condition A.7.1.1.:** Please reword the first sentence as follows: "Except as provided below, the primary fuel allowed to be burned in the MWCs is municipal solid waste." Please delete the second sentence, as it conflicts with the subsequent conditions in the permit.
17. **Page 8, Condition A.7.1.6.:** In the last sentence in this condition, please insert "or propane" following the word "natural."
18. **Page 9, Condition A.7.1.9.(h):** Please add the following to the end of this condition, "Waste materials specifically authorized above do not require prior Department approval before combustion."
19. **Page 9, Condition A.7.2.0.:** Please insert the words "or propane" following the word "natural" in two places.
20. **Page 9, Condition A.7.3.0.:** We request deletion of the 1,800° F temperature limit. USEPA's White Paper for streamlining Permits encourages elimination or replacement of potentially obsolete or dated PSD permit/NSR language. The Title V permit substantially tightens the carbon monoxide (CO) limit from 400 ppmv/hourly to 100 ppmv/4-hour-block average. USEPA and other states now use CO monitoring as the preferred measure of good operating practice, instead of the temperature correlations used in the past.

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Alternately, please delete the existing sentence and replace it with: "The furnace roof temperature shall be no less than 1,167° F (4-hour average) while the MWC is continuously combusting waste." The 1,167° F roof temperature can be measured with a thermocouple, and correlates to 1,800° F temperature in the combustion zone. Please state that this is not federally enforceable.

21. **Page 10, Condition A.9.:** Please change the reference near the end of the first sentence from "Specific Condition A.3" to "Specific Condition A.5." Condition A.3 refers to the overall maximum of 114% of the nominal load. Condition A.5, which refers to the maximum demonstrated load, appears to be the more appropriate reference.
22. **Page 10, Condition A.11.:** In (1), please place a period after the word "average," and delete the rest of the sentence, because it is not applicable to the Pasco Facility. Please delete (2) in its entirety. It is not applicable to the Pasco Facility.
23. **Page 11, Condition A.11.(8):** The Pasco Facility is subject to the dioxin/furan standards at 40 CFR 60.33b(c)(1), not 40 CFR 60.52b(c). Please locate and change all permit references to Subpart Cb for applicability.
24. **Page 12, Condition A.11.(10)(ii):** Please delete all permit references to the CO₂ correction. The Pasco Facility CEMS are equipped with O₂ monitors.
25. **Page 12, Condition A.12.(a), (b), (c), and (d):** Please add the actual dates, since the date of the State Plan approval is known. Alternately, delete the preliminary language and start these conditions with "Each chief facility operator..."
26. **Page 14, Condition A.14.:** Please delete this condition, because it is history and no longer applies. All specified operators have been certified.
27. **Page 14, Emission Limitations and Standards:** The first paragraph references Table 1-1, which does not appear to have been included in our copy of the draft permit.

As noted in Comment No. 1, these limitations do not include the existing PSD permit limits (Permit No. PSD-FL-127), which apply to the three MWC combustion units. Please revise this section to include the PSD permit limits, which will be replaced by the 40 CFR 60 Subpart Cb limits when the upgraded units commence operation (by no later than April 19, 2000).

28. **Page 14, Condition A.16.:** The existing PSD particulate matter emissions limit of 0.0150 gr/dscf @ 12% CO₂ (equivalent to 0.0322 lb/MMBtu) can be more stringent than the 40 CFR 60 Subpart Cb limit of 27 mg/dscm @ 7% O₂, depending on the O₂ and CO₂ concentrations in the flue gases. At design operating conditions, the

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existing PSD limit is equal to 0.016 gr/dscf @ 7% O₂, which is lower than the Subpart Cb equivalent limit of 0.12 gr/dscf @ 7% O₂. Therefore, the PSD limit should also be carried forward in the Title V permit, in addition to the Subpart Cb limit.

29. **Page 14, Condition A.17.:** Please insert "block" in the parenthetical clause about averaging in the second line, to specify that the opacity limit is a 6-minute block average.
30. **Page 14, 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 and it is consistent with the USEPA streamlining policy.
31. **Page 15, 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 and it is consistent with the USEPA streamlining policy.
32. **Page 15, Condition A.29.:** "250" should be "205."
33. **Page 16, 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 and it is consistent with the USEPA streamlining policy.
34. **Page 16, Condition A.31.:** "200" should be "100." Also, "24-hour block average" in the last sentence should be "4-hour block average beginning at midnight."
35. **Page 16, Excess Emissions:** In the permitting note please delete reference to the Acid Rain program as it does not affect MWC units.
36. **Page 17, Condition A.35.(1), first sentence:** Please delete "Except as provided by 40 CFR60.56b," because this only applies to air curtain incinerators. Please change the reference from "40 CFR 60 Subpart Eb" to "40 CFR 60 Subpart Cb" to avoid any confusion.
37. **Page 17, Condition A.35.(1), second sentence:** Please add the underlined words to the second sentence, consistent with the Emissions Guidelines (40 CFR 60.58b(a)(1)): "Duration of startup, shutdown, or malfunction periods are limited to 3 hours per occurrence."
38. **Page 17, Condition A.36.:** Pasco County requests that "two hours in any 24-hour period" be changed to "three hours per occurrence" for the duration of excess emissions due to equipment malfunction, consistent with the Emissions Guidelines (40 CFR 60.58b(a)(1)). We understand that the Department has granted three hours

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for the Tampa and Hillsborough facilities. Also note that two hours in any 24 hour period malfunction limitation is not a federally enforceable condition.

39. **Page 17, Condition A.37.:** Pasco County requests that a condition incorporating the provisions of Rule 62-210.700(5) (Excess emissions) be included in this permit:
"Considering operational variations in types of industrial equipment operations affected by this rule, the Department may adjust maximum and minimum factors to provide reasonable and practical regulatory controls consistent with the public interest."
40. **Page 17, Condition A.38.:** Please reference Condition No. A.51 here as the conditions that DEP specifies for operation of the Facility during performance tests.
41. **Pages 18 to 27, Conditions A.26. to 45. and A.49., A.53., A.59.to A.65.:** Putting the full text of standard federal and state stack test methods into the Title V permit is inconsistent with USEPA's March 5, 1996 "White Paper #2 for Improved Implementation of the Part 70 Operating Permit Program." Unless alternate test methods are being approved, USEPA streamlining guidance states that:

"The permitting authority may allow referencing where it is specific enough to define how the applicable requirement applies...This approach is a desirable option where reference material is unambiguous in how it applies to the permitted facility, and it provides for enforceability from a practical standpoint" (page 38).

Each of the referenced testing provisions are found in their entirety in the publicly available Code of Federal Regulations and/or Florida State Rules. We request that the details of stack test methods be eliminated, and test methods be incorporated by reference.

42. **Page 18, Condition A.39.(8)(ii):** Please specify that COMS must record data on a "6-minute block average."
43. **Page 18, Condition A.39.(11):** Please insert the word "facility" after "affected" in the second line.
44. **Page 23, Condition A.44.(3)(ii):** Since the Pasco Facility corrects all pollutants to 7% O₂, all references to carbon dioxide, including correlations between O₂ and CO₂, could be deleted. (e.g. A.40.(1)(v); A.44.(3)(ii); and A.44.(8))
45. **Page 23, Condition A.44.(5)(iii):** This condition refers to 7 nanograms per dry standard cubic meter in four places. Please change these to 15 nanograms per dry standard cubic meter, consistent with 40 CFR 60 Subpart Cb for existing facilities. The 7 nanograms is from 40 CFR 60 Subpart Eb for new facilities, which does not apply.

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46. **Page 23, Condition A.44.(6)(ii):** In the first line, the word "selects" should be "elects".
47. **Page 25, Condition A.46.:** Please include Method 13A as an acceptable test method. The Department has approved this for other MWC facilities. Also, consistent with permits for other MWC facilities, we request that this testing be performed at the initial compliance test after the air pollution control equipment upgrade, and every five years thereafter.
48. **Page 25, Condition A.47.:** Please include Method 29 as an acceptable test method. The Department has approved this for other MWC facilities. We request that this condition be eliminated, or at least the testing provision either be eliminated or limited to an initial compliance test only. It is the facility operator's experience from dozens of test runs nationwide, that no detectable levels of beryllium is observed when using the best available sampling technology: A GC/mass spectrometer.
49. **Page 25, Condition A.48.:** Please include Methods 18 and 25 as acceptable test methods. The Department has approved this for other MWC facilities. Also, consistent with permits for other MWC facilities, we request that this testing be performed at the initial compliance test after the air pollution control equipment upgrade, and every five years thereafter.
50. **Page 26, Condition A.51.:** At the end of the first sentence, please replace the words "the permit" with the words "Condition A.3." In the second sentence, please strike the word "minimum."
51. **Page 27, Condition A.55.(a):** All of (a) could be deleted as it is redundant and or not applicable. If the section is retained please add [Reserved] for the missing sections.
52. **Page 27, Condition A.55.(c):** This waiver has been granted for the activated carbon storage silo (Condition B.3). Please reference that here.
53. **Page 30, Condition A.64.:** Please delete this condition. It is not applicable to this facility.
54. **Page 30, Condition A.66.(b).:** Please strike the words "belt scales, weight hoppers, and tank scales," as they are not applicable to the Pasco Facility.
55. **Page 31, Condition A.67.(6) and (7).:** Please delete these paragraphs, since the Pasco Facility is currently using O₂ monitors for data correction, and will continue to do so.
56. **Page 32, Condition A.70.:** This condition, from the General Provisions of 40 CFR 60, requires quarterly reporting of excess emissions. This conflicts with the source-specific excess emissions reporting requirement in 40 CFR 60.59b(h) (also in

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Condition A.78 of this permit) which requires semi-annual reporting of excess emissions. Pasco County requests that the semi-annual excess emission reporting requirement in Condition A.78 supersede this one.

57. **Page 32, Condition A.71.:** This condition references Figure 1, which is not attached to our copy of the draft permit.
58. **Page 33, Condition A.72.:** These conditions appear to restate 40 CFR 60.7(e)(1) in its entirety. We request incorporation by reference to streamline the permit.
59. **Page 35, Condition A.75.(11):** This condition is missing, and should have [Reserved] in its place, as (10) does.
60. **Page 36, Condition A.75.(14) and (15) and A.76.(5):** Please delete all permit references to "dioxin/furan control," since the carbon system at the Pasco Facility was installed for mercury control.
61. **Page 38, Condition A.83.:** This condition, similar to Conditions A.70 and A.78, requires excess emissions reports. Pasco County requests that the semi-annual reporting frequency requirement from the source-specific rule (40 CFR 60.59b(h) and Condition A.78) supersede the general quarterly excess emissions reporting requirements in this condition, and in Condition A.70. (See Comment No. 39.)
62. **Page 38, Condition A.84.(b):** We understand that other waste-to-energy facilities in Florida have been granted 60 days after testing to submit the test report, rather than 45 days. Due to the complexity of the dioxin testing and analysis, we request that this condition be revised so that the Pasco County Facility may similarly be allowed up to 60 days to file the test report with DEP.
63. **Page 39, Condition A.84.(c)15.:** Please revise this condition by adding the underlined words: "Data on the types and amounts of any chemical solutions used consistent with applicable USEPA/FDEP test methods." The need for placing this additional, non-regulatory requirement on the test process is unclear to us.
64. **Page 39, Condition A.85.(a):** To the last line, please add the underlined text:
l...measured as a 30-day rolling average, using the facility truck scale and recorded.
65. **Page 41, Condition B.3.:** No testing frequency is specified. We propose that this visible emissions test be conducted annually, consistent with other MWC permits and Rule 62-297.310(7), F.A.C.
66. **Page 41, Condition B.4.:** We believe that the reference for the PM-RACT exemption in the last sentence should be Rule 62-296.700(2)(c), instead of (b).
67. **Page 42, Following Condition B.6.:** Please add the following condition:

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"B.7. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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. [Rule 62-210.700(1), F.A.C.]"

68. **Page 43, Condition C.3.:** No testing frequency is specified. Permit No. 1010056-001-AC, Condition No. 6. specifies testing at start-up only.

69. **Page 43, Following Condition C4.:** Please add the following condition:

"C.5. Excess emissions from these emissions units resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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. [Rule 62-210.700(1), F.A.C.]"

70. **Page 46, List of Insignificant Emissions Units:** Please make the following changes to this list:

- In No. 8, please change "Cooing" to "Cooling."
- Please delete No. 9, Landfill Containing Ash (see Comment No. 5).
- Please add "Indoor lime storage silo."
- Please add "Sulfuric acid tank (4,500 gallons)."
- Please add "Sodium hydroxide tank (4,500 gallons)."
- Please add "Ammonia tank (10,000 gallons at 19% solution)."
- Please add "Chlorine cylinders (1,350 lbs., total)."
- Please add "Propane tank (30,000 gallons)."

71. **Page 47, Appendix H-1:** Please add in the amendment of June 25, 1997, for use of USEPA Method 29 in lieu of Method 101A for mercury.

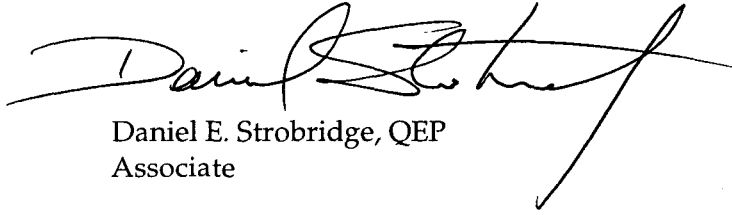
We greatly appreciate your consideration of these comments on the DRAFT Initial Title V Air Operation Permit for the Pasco County Resource Recovery Facility. Because Comment Nos. 1 and 7 will result in significant changes to the Draft Initial Title V Permit, we request that DEP issue the revised permit conditions as DRAFT again. This would give us the opportunity to review and comment on the PSD permit conditions that will be added for the MWC emissions units, and on all the permit conditions that will be added for the Fugitive Landfill Gas emissions unit, and Ash Building and

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Handling System emissions unit. 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. Strobridge, QEP
Associate

cc: J. Gallagher, Pasco County
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