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JUL 15 2010

**BUREAU OF
AIR REGULATION**



July 13, 2010

Mr. Jeff Koerner
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

Re: Pinellas County Resource Recovery Facility, Permit 1030117-006-AV

Dear Mr. Koerner:

This letter is to confirm our discussion on the methodology used to calculate the average daily solid waste charging rate as required by Condition B9 and B95 in the Pinellas County Resource Recovery Facility Operating Permit (permit number 1030117-006-AV). It is our understanding that the average required by these conditions will be calculated as follows:

Unit Average Daily Charging Rate (TPD) =

$$\frac{\text{Total Tons Processed}}{\text{Number of Operating Days in Calendar Month}}$$

The total tons processed shall be determined by adding monthly incoming refuse, as determined based on scale records, and the change in pit inventory.

Change in pit inventory shall be calculated by subtracting the pit inventory at the beginning of the calendar month from the pit inventory at the end of the calendar month, and may be a positive or negative value.

PLEASE ADDRESS REPLY TO:
3095 - 114th Avenue North
St. Petersburg, Florida 33716
Phone: (727) 464-7500
FAX: (727) 464-7713
Website: www.pinellascounty.org



Any day with at least one operating hour for an emissions unit is an operating day for that emission unit. An hour is the 60-minute period beginning at the top of each hour. Any hour during which an emissions unit is in operation for more than 15 minutes is an operating hour for that emission unit. A day is the 24-hour period from midnight to midnight.

Facility Annual Average Daily Charging Rate (TPD) =

$$\frac{\text{Total Tons Processed for Previous 12-Month Period}}{\text{Number of Operating Days for Previous 12-Month Period}}$$

The Unit Average Daily Charging Rate shall be calculated on a calendar month basis. The Unit Average Daily Charging Rate shall not exceed 1100 tons per day per unit on a monthly average basis. The Facility Annual Average Daily Charging Rate shall not exceed 1000 tons per day per unit.

Please confirm that you are in agreement with this methodology. Should you have any questions, you can contact me via email at koswald@pinellascounty.org or by telephone at 727-464-7514.

Sincerely,



Kelsi Oswald
WTE Program Manager
Pinellas County Utilities

ec: Chris Neu, Veolia ES Pinellas, Inc.
Robert Hauser, Pinellas County
David Dee, Young Van Assenderp, P.A.