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June 20, 2011

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road
MS #5505
Tallahassee, Florida 32399-2400

RE: Comments Regarding Public Notice of Intent to Issue Air Permit
Draft / Proposed Permit No. 1030117-008-AV

On April 28, 2011, the Florida Department of Environmental Protection (FDEP) issued emails to the Pinellas County RRF (Facility) stating that a draft of the Facility's renewal Title V permit was available for review and comment. The Public Notice of Intent to Issue Air Permit for the draft / proposed permit was published on May 21, 2011. The purpose of this letter, from the current operator of the Facility, is to submit comments regarding the proposed Title V permit renewal to the FDEP for consideration in accordance with the comment provisions of the Public Notice.

The Proposed Title V Permit contains Table 3 Revised Facility Baseline and Projected Actual Emissions Estimates. On May 17, 2011 Pinellas County (County) forwarded to the FDEP a report prepared by a group of independent experts retained by Veolia ES Pinellas, Inc., the operator of the Facility, regarding erroneous Facility baseline emissions data from 2004 - 2006. The County indicated in its letter to FDEP that it would conduct an independent assessment of the experts' findings, and then provide results of its assessment to the FDEP.



The conclusions presented by the experts refute the validity the Facility's baseline PSD emissions that were submitted to the FDEP prior to Veolia assuming operation of the Facility. As such, Veolia does not believe the FDEP should incorporate the erroneous baseline emissions into the Facility's final Title V operating permit until the results of either the Department's assessment or the County's assessment of this matter has been resolved.

Sincerely,

Thomas Murphy by C. Neu

Thomas Murphy, President
Veolia ES Pinellas, Inc.

Cc:

Robert Hauser, Pinellas County
Kelsi Oswald, Pinellas County
Chris Neu, Facility Manager
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