



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

March 1, 2012

Electronic Mail – Received Receipt Requested

rhauser@pinellascounty.org

Mr. Robert J. Hauser, Director
Pinellas County Department of Environmental and Infrastructure
3095 114th Avenue North
St. Petersburg, Florida 33716

Re: **Request for Additional Information**
Project No. 1030117-009-AC
Pinellas County Resource Recovery Facility
Emission and Process Limit Modifications

Dear Mr. Hauser:

On January 31, 2012, we received your response to our initial request for additional information (RAI) regarding the application for an air construction permit to revise the carbon monoxide (CO), sulfur dioxide (SO₂) and process limits applicable to the three municipal waste combustors at the Pinellas County Resource Recovery Facility located at 3001 110th Avenue North in St. Petersburg, Florida.

The application is incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. With reference to question 4 in our previous RAI, please provide justification why a full ambient air quality standards (AAQS) analysis is not required given that initial modeling results predict ambient concentrations greater than the respective Class II one-hour and 24-hour Significant Impact Level (SIL).
2. With reference to question 3 in our previous the RAI, please provide hour-by-hour steam flow data for a representative year when the units were operating regularly at the maximum continuous rating. Please provide the MCR for the units and, if available, the peak (2 to 4 hour) rating.
3. With reference to question 6 in our previous RAI, please provide the minute by minute data (if available) and the hour-by-hour data during the two days immediately before and after the continuous emission monitoring systems (CEMS) were replaced on each unit. Include lime injection rates as available.
4. Please provide a copy of the PSD Avoidance Report as required by Condition A.37 of Permit 1030117-008-AV. Please include updated analyses for SO₂, CO and include particulate matter (PM) per discussions of February 13, 2012.
5. Please conduct and provide tests for PM to assess the effect of the variation in PM with respect to changes in the test method as well as changes in the control equipment operation. These can be conducted before or during the annual test campaign planned for April 2012.

REQUEST FOR ADDITIONAL INFORMATION

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Prevention of Significant Deterioration).

All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Tammy McWade, at 850/717-9086 or at tammy.mcwade@dep.state.fl.us.

Sincerely,



A. A. Linero, P.E.
Office of Permitting and Compliance

This letter was sent to the following people by electronic mail with received receipt requested.

Robert J. Hauser, Pinellas County: rhauser@pinellascounty.org
Christopher Neu, Plant Manager, Veolia: christopher.neu@veoliaes.com
Christopher C. Tilman, P.E., ARCADIS: christopher.tilman@arcadis-us.com
Robert Wong, DEP SWD: robert.wong@dep.state.fl.us
Heather Abrams, EPA Region 4: abrams.heather@epa.gov
Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us
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JFK/aal/ttm