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December 2, 2013

Mr. Jeff Koerner
Program Administrator
Florida Department of Environmental Protection
Office of Permitting and Compliance
2600 Blair Stone Road, MS# 5500
Tallahassee, Florida 32399-2400

RE: Pinellas County Resource Recovery Facility
Request for Time Extension
Air Construction Permit No. 1030117-009-AC (PSD-FL-420)

Dear Mr. Koerner:

For the reasons set forth below, Pinellas County (County) respectfully requests the Florida Department of Environmental Protection (Department or FDEP) to extend the expiration date of the air construction permit (No. 10130117-009-AC;PSD-FL-420) for the Pinellas County Resource Recovery Facility (Facility). The air construction permit (Permit) was issued on November 19, 2012 and it is scheduled to expire on December 31, 2013. The County wishes to extend the expiration date of the Permit to December 31, 2016 so that the County will have an adequate opportunity to evaluate and implement additional improvements to the Facility's air pollution control systems.

Among other things, the Permit:

- Reduced the Facility's emissions limits for SO₂ to a BACT limit of 24 ppmvd @ 7% O₂ or 80% reduction, based on a 24-hour geometric mean (CEMS), and 24 ppmvd @ 7% O₂, based on a 30 day average (CEMS);
- Reduced the Facility's emission limit for HCl to a BACT limit of 20 ppmvd @ 7% O₂ (annual test);

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Solid Waste Division, 3095 114th Avenue N., St. Petersburg, FL 33716
Phone: (727) 464-7500 www.pinellascounty.org



- Imposed a new BACT emission limit for PM_{2.5} of 30 mg/dscm, which includes filterable and condensable PM_{2.5} (annual test); and
- Authorized various construction projects to improve the Facility's performance, including work on the Facility's spray dryer absorber (SDA), fabric filter (FF) baghouse, selective non-catalytic reduction (SNCR), and combustion system.

The new BACT limits established by FDEP for SO₂ and HCl are more stringent than the emission limits applicable to other existing municipal waste combustors (MWC) pursuant to the FDEP's MWC Rule (i.e., Rule 62-204.800(9)(b), Florida Administrative Code). The new emission limit for PM_{2.5} has not been imposed on any of the other existing MWC facilities in Florida. The County is the first one required to comply with the FDEP's stringent new emissions limits for SO₂, HCl, and PM_{2.5} while using existing MWC units.

The County is concerned about the Facility's ability to comply with the new emission limits on a continuous, long term basis. The Facility's ability to comply with the PM_{2.5} annual emissions limit of 30 mg/dscm has only been evaluated one time--during the April 2013 annual emissions testing. The overall results for PM_{2.5} were satisfactory, but they were relatively close to the PM_{2.5} emissions limit. Moreover, the results for one test run exceeded the emission limit for PM_{2.5}. Although the results for this test run appear to be an outlier, the results raise questions about the Facility's performance in future tests.

Extending the Permit would provide the County with time to conduct the Facility's next annual stack test in April 2014 and then determine whether, and the extent to which, the Facility's air pollution control system must be upgraded to ensure continuous compliance with the new PM_{2.5} emission limit.

The same rationale applies with regard to the Facility's ability to comply with the new, more stringent emissions limit for HCl. The Facility historically has been able to comply with the applicable HCl emissions standards with an adequate margin of safety, but the new, lower emission limit significantly reduces that margin. Consequently, the County now is concerned that some enhancements to the Facility's air pollution control system may be necessary.

These concerns are related to other issues that will affect the Facility's performance. Among other things, the County is initiating a procurement process for the selection of a contractor that will be responsible for the long term operation of the Facility. As part of that procurement process, prospective operators will be given the opportunity to make suggestions for projects that they believe will improve the performance and reliability of the Facility. The County anticipates that some of these projects will be conditions precedent to the execution of a new operating contract (i.e., planning for and/or completion of the projects will be required before the prospective contractors will agree to operate the Facility and guarantee its future compliance with the emission limits in the Permit). The County expects to complete procurement and award its contract during the second or third quarter of 2014.

In addition to these procurement issues, the County and the current operator continue to perform significant investigative studies and system evaluations at the Facility. The County and operator are employing the services of numerous industry experts in combustion control and other system specifics to assist them in determining and selecting the most beneficial and timely projects to improve the Facility's performance. These studies and evaluations are on-going at this time.

The County wishes to extend the expiration date of the Permit until December 31, 2016 because the County wants to ensure that it has sufficient time for: (1) a second round of stack testing under the new, stricter Permit limits and an determination as to whether any Facility improvements are needed to consistently and reliably comply with the new BACT limits; (2) implementation of any improvements to the Facility's air pollution control system that are identified as a result of the current studies being performed by the County and the Facility operator; and (3) the completion of certain projects that the County anticipates will be identified during the procurement process and included as part of the new contract.

The County continues to work diligently towards the selection and completion of projects that will ensure the Facility's continuous compliance with the Department's emissions standards. The County is committed to improving the Facility's overall performance and reliability. Given the County's efforts to accomplish these goals, the County respectfully requests the Department to extend the Permit and thereby enable the County to complete its work on the Facility.

Sincerely,



Kelsi Oswald
WTE Program Manager
Pinellas County Division of Solid Waste

Cc: Robert Hauser, Director, Division of Solid Waste
Beth Burns, Senior Environmental Specialist, Division of Solid Waste
Cindy Mulkey, FDEP Office of Siting Coordination
Susan Pelz, FDEP SW District
Tamara Stankunas, Earthshine Environmental, Inc.
Rebecca Macionski, GCS Energy Recovery of Pinellas, Inc.
David Dee, Gardner, Bist, et. al., P.A.