From:	Burns, Beth
To:	Scearce, Lynn
Cc:	Oswald, Kelsi
Subject:	RE: 1030117-012-AC (PSD-FL-420B), Pinellas County Department of Environment and Infrastructure, Pinellas County Resource Recovery Facility, Draft Permit
Date:	Wednesday, November 19, 2014 6:08:50 PM
Attachments:	image006.png 1030117-009-AC Permit Reporting Requirements Request.pdf

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Ms. Scearce,

As Pinellas County's Senior Environmental Specialist for the Resource Recovery Facility, I'd like to respond to your request for review of the documents associated with the 1030117-009-AC Permit Reporting Requirements Request. The County has no suggested changes to the Draft Permit. I would like to suggest some clarifications to the "Technical Evaluation and Preliminary Determination". These suggestions are as follows:

On page 4 of 7, 1.4:

The citation regarding reporting requirement for excess emissions due to malfunctions appears incorrect. In the Title V permit (and as relayed in our "Request for Administrative Corrections Reporting Requirements" document, September 8, 2014 (attached for your convenience)) we specify the exact language included in the Title V Permit, the language we want to harmonize with the Title V, in the Air Construction Permit, and our suggested revision. The Technical Evaluation incorrectly states:

"Under the Title V permit, facility malfunctions are to be reported immediately to the Department, while excess emissions related to malfunctions are to be reported on a quarterly basis, and excess emissions from other causes are to be reported semiannually."

The more accurate language should read, with suggestions italicized, "Under the Title V permit, facility malfunctions are to be reported immediately to the Department. *In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Compliance Authority in accordance with 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Compliance Authority."*

As a matter of housekeeping, there are a few other items that are no longer accurate, but we can clean up at a later date if need be:

- Page 2 of 7 indicates Veolia ES as operator *(as of December 7, 2014, Covanta Projects, LLC will be our operator)*
- Page 3 of 7 includes EU004 Hydrated Lime Silo for Water Softening which is no longer applicable *(the Lime Softening System has been decommissioned)*

Because these suggestions concern the Technical Evaluation and not the Draft Permit, we are proceeding with publishing the Public Notice. Please contact me with any questions or concerns you may have. Thank you and have a good evening.

Beth Burns
Senior Environmental Specialist
Pinellas County Solid Waste
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Fax (727) 464-7713

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From: Scearce, Lynn [mailto:Lynn.Scearce@dep.state.fl.us]
Sent: Thursday, November 13, 2014 11:36 AM
To: Oswald, Kelsi
Cc: Hauser, Robert; kushala.gowda@arcadis-us.com; tstankunas@earthshineinc.com; Boatwright, Kelley M.; Ceron, Heather; Shepherd.Lorinda@epa.gov; Dawson, John; Read, David; Scearce, Lynn
Subject: 1030117-012-AC (PSD-FL-420B), Pinellas County Department of Environment and Infrastructure, Pinellas County Resource Recovery Facility, Draft Permit

Dear Ms. Oswald:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and reply back verifying receipt of the documents provided in the links.

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify

Owner/Company Name: PINELLAS COUNTY UTILITITES ADMIN.
Facility Name: PINELLAS CO. RESOURCE RECOVERY FACILITY
Project Number: 1030117-012-AC-PSD-FL-420B
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: PINELLAS

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1030117.012.AC.D_pdf.zip.

If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Sincerely,

Lynn Scearce

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