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September 8, 2014

Mr. Al Linero
Department of Air Resources Management
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 Administrative Corrections Related to Reporting Requirements
Air Construction Permit No. 1030117-009-AC (PSD-FL-420)/1030117-010-AC (PSD-FL-420A)**

Dear Mr. Linero:

This letter and attached pages of the Application for Air Permit Form are intended to request an administrative permit correction to the Pinellas County Resource Recovery Facility (Facility) Air Construction Permit. As discussed in your recent telephone conversation with Pinellas County's environmental consultant Earthshine Environmental, Inc., Pinellas County (County) respectfully requests the Florida Department of Environmental Protection (Department or FDEP) to harmonize specific reporting frequency requirements language in the Facility's Air Construction Permit (No. 1030117-009-AC; PSD-FL-420) to align with the requirements stipulated in the Facility's current Title V Air Operation Permit (Permit No. 1030117-008-AV). It was recently noticed that the Air Construction Permit contains an administrative issue related to the Facility's required reporting frequency of excess emissions and monitoring system performance following the NSPS format contained in 40 CFR 60.7(c), Subpart A. The Air Construction Permit stipulates the reporting is to be provided to the Department on a quarterly basis during a calendar year, while the Title V Permit requires the reporting to be provided only on a semi-annual basis.

The following provides the Air Construction Permit reporting frequency citation to which the County is requesting changes so that it aligns with the Facility's Title V Air Operation Permit:



The Air Construction Permit (Permit No. 10130117-009-AC) stipulates the following:

- **Section 3. “Emissions Units Specific Conditions,” Item 31., b - State Implementation Plan (SIP) Quarterly Permit Limits Excess Emissions Reports -** *“Within 30 days following the end of each calendar quarter, the permittee shall submit a report to the Compliance Authority summarizing periods of SO₂, CO, NO_x, as well as opacity in excess of the permit limits following NSPS format 40 CFR 60.7(c), Subpart A. Periods of start-up, shut-down, and malfunction shall be monitored, recorded, and reported as excess emissions when levels exceed the standards specified in this permit. In addition, the report shall summarize CEMS/COMS availability for the previous quarter.”*

The rule citations specifically referenced in the Air Construction Permit, Section C. 31.b. State Implementation Plan (SIP) Quarterly Permit Limits Excess Emissions Report indicates quarterly reporting would only be required if *“Administrator determines that more frequent reporting is necessary to accurately assess the compliance status of the source”* as specified in 40 CFR § 60.7. Based on our recent conversations with the Department, prior interactions during the actual Air Construction Permitting process, and the County’s on-going reporting on a semi-annual basis in accordance the Facility’s Title V Permit, it is our understanding semi-annual reporting is sufficient, appropriate, and in compliance with the Department’s requirements and that the quarterly reporting language was inadvertently included in the Air Construction Permit.

The following are the specific citations in the Facility’s Title V Air Operation Permit conveying the reporting requirements. The County is requesting that the Department replace the language in the Air Construction Permit with language in alignment with the Title V Permit:

- **Title V Air Operation Permit No. 1030117-008-AV, Section III - Emissions Units and Specific Conditions, Subsection A, Recordkeeping and Reporting Requirements, A.37** contains a reporting schedule table which indicates that reporting of Excess Emissions from Malfunctions is to be done quarterly, only if requested by the Compliance Authority, and NSPS Excess Emissions and Monitoring System Performance Reporting is on a semi-annual basis.

Title V Air Operation Permit No. 1030117-008-AV, Section III, Subsection A, Item A.38. Excess Emissions from Malfunctions states the following - *“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.”*

Appendix RR, Facility-Wide Reporting Requirements, Item RR3. Reports of Deviations from Permit Requirements includes the following - *“The permittee shall report in accordance with the requirements of Rule 62-210.700(6), F.A.C. (below), and Rule 62-4.130, F.A.C. (condition RR2.), deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken.”* **Rule 62-210.700(6):** *“In case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department or the appropriate Local Program in*

accordance with Rule 62-4.130, F.A.C. (See condition RR2.). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.”

To establish consistency with the Facility's Title V Permit reporting requirements the County suggests the following changes to the Facility's Air Construction Permit, Section 3, Item 31.b:

- **Section 3. “Emissions Units Specific Conditions,” Item 31., b – Excess Emissions from Malfunctions** *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 specifically requested by the Compliance Authority. Excess Emissions and Monitoring System Performance Reporting shall be on a semi-annual basis in accordance with the Facility's Title V Air Operation Permit No. 1030117-008-AV.*

The County currently reports Facility emissions, monitoring system performance, and other operational information in a variety of Department required formats on an annual, semi-annual, and “immediate reporting” (as per 62-4.130, F.A.C.) frequency. The reports provide a significant amount of data with more than adequate information to accurately assess the compliance status of the Facility.

The County believes that the information submitted with this request letter is sufficient to harmonize the reporting requirements frequency language in the Facility's Air Construction Permit (No. 1030117-009-AC; PSD-FL-420) to align with the requirements stipulated in the Facility's current Title V Air Operation Permit (Permit No. 1030117-008-AV). Should you have any questions regarding this request or need additional information, please contact me at 727-464-7514.

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
Mary Yeargan, FDEP SW District
Tamara Stankunas, Earthshine Environmental, Inc.
Kushala Gowda, ARCADIS U.S., Inc.
Rebecca Macionski, GCS Energy Recovery of Pinellas, Inc.



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Pinellas County Board of County Commissioners	
2. Site Name: Pinellas County Resource Recovery Facility	
3. Facility Identification Number: 1030117	
4. Facility Location... Street Address or Other Locator: 3001 110 th Avenue North City: St. Petersburg County: Pinellas Zip Code: 33716-2002	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Tamara L. Stankunas, P.G.	
2. Application Contact Mailing Address... Organization/Firm: Earthshine Environmental, Inc. Street Address: 19046 Bruce B. Downs Blvd., #237 City: Tampa State: Florida Zip Code: 33647	
3. Application Contact Telephone Numbers... Telephone: (813) 545-7067 Fax: (813) 441-6911	
4. Application Contact E-mail Address: tstankunas@earthshineinc.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit. (**See Application Comment Section*)
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.


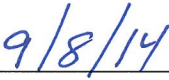
Application Comment

* This application submittal is to request administrative corrections to the language in the Pinellas County Resource Recovery Facility's Air Construction Permit No. 1030117-009-AC (PSD-FL-420) related to the frequency of reporting requirements for NSPS excess emissions and monitoring system performance so that it aligns with the reporting requirements language in the Facility's current Title V Air Operation Permit No. 1030117-008-AV.

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Kelsi Oswald, WTE Program Manager
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Pinellas County Department of Environment and Infrastructure Street Address: 3095 114 th Avenue North City: St. Petersburg State: FL Zip Code: 33716
3. Owner/Authorized Representative Telephone Numbers... Telephone: (727) 464 - 7514 Fax: () -
4. Owner/Authorized Representative E-mail Address: koswald@pinellascounty.org
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  Signature  Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

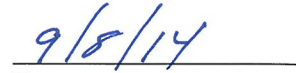
1. Application Responsible Official Name: Robert Hauser
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source or CAIR source.
3. Application Responsible Official Mailing Address... Organization/Firm: Pinellas County Department of Environment and Infrastructure Street Address: 3095 114 th Avenue North City: St. Petersburg State: FL Zip Code: 33716
4. Application Responsible Official Telephone Numbers... Telephone: (727) 464 - 7500 Fax: (727) 464 - 7713
5. Application Responsible Official E-mail Address: rhauser@pinellascounty.org

APPLICATION INFORMATION

6. Application Responsible Official Certification:

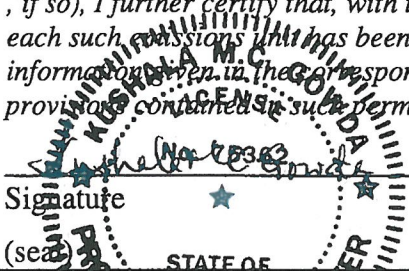
I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.


Signature


Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Kushala M.C. Gowda, P.E. Registration Number: 75362
2. Professional Engineer Mailing Address... Organization/Firm: ARCADIS U.S., Inc. Street Address: 14025 Riveredge Drive, Suite 600 City: Tampa State: FL Zip Code: 33637
3. Professional Engineer Telephone Numbers... Telephone: (954) 414-9001 Fax: (954) 761-7939
4. Professional Engineer E-mail Address: kushala.gowda@arcadis-us.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Signature _____</p> <p>(see) </p> </div> <div style="width: 45%;"> <p>Date <u>9-5-2014</u></p> </div> </div>

* Attach any exception to certification statement.