



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIRSTONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Electronic Mail – Received Receipt Requested

Steve Leavitt, P.E., Director
City of St. Petersburg
635 3rd Avenue North
St. Petersburg, Florida 33713

Re: **Request for Additional Information**
Project No. 1030558-001-AC
City of St. Petersburg, Southwest Water Resource Facility
Bio-Solids Improvement Project

Dear Mr. Leavitt:

On May 9, 2014, we received your application and sufficient fee for an air construction permit to consolidate the City of St. Petersburg's (City) bio-solids operation for all their treatment plants at the Southwest Water Resource Facility (SWWRF) to capture the digester gas and clean it up to natural gas standards to fuel the City's sanitation vehicle fleet and provide electricity to the City's SWWRF. On June 5, 2014, we issued a Request for Additional Information (RAI) and on August 22, 2014 we received your response to the RAI. The facility is located in Pinellas County at 3800 54th Avenue South in St. Petersburg, Florida. The application indicates that the project is subject to general preconstruction review pursuant to rule 62-212.300 of the Florida Administrative Code (F.A.C.). 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. Please provide the UTM coordinates for the project (the project location coordinates). These are given as: Zone XX, XXX kilometers (km) East, and XXXX km North.
2. Title V Major Source Applicability: In determining if the facility is a Title V major source, the application does not include all of the proposed emission units at the facility as well as the facility-wide hazardous air pollutants (HAP) emissions. Please identify each regulated pollutant which the applicant knows or has reason to believe the facility emits or has the potential to emit above a de minimis level. Please include any existing equipment, flares and/or activities that produce air emissions. Identify if any existing equipment will be removed or replaced. According to the domestic wastewater facility permit (FLA128848) backup power is provided by four, on-site standby diesel powered generators. Please identify all engines and fire pumps at the facility.
3. Digester Gas Cleanup Process: Based on the application, this project will clean the digester gas to meet natural gas standards. Please provide a detailed description of the digester gas cleaning process, including:
 - a. What contaminants are in the digester gas after it is released from the anaerobic digesters and how the digester gas cleaning process removes these contaminants.
 - b. Descriptions of the equipment used in the digester gas cleanup system (Biogas Upgrade System), the control efficiencies of the equipment used and any other supporting information including vendor guarantees.
4. Emission Factors: New Source Performance Standards (NSPS) Subpart JJJJ of 40 CFR 60 (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) provides emission factors for the two 1,517 brake-horse power (bhp) Cummins engines when firing digester gas. However, when determining the potential to emit emissions for the criteria pollutants and HAP in the application, the emission factors for

REQUEST FOR ADDITIONAL INFORMATION

firing only natural gas were used. Please provide the manufacturers guarantee that the natural gas emission factors are representative when firing cleaned digester gas. In addition, please provide the manufacturers guarantee that these engines will not lose their natural gas certification when firing cleaned digester gas.

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 email, tammy.mcwade@dep.state.fl.us.

Sincerely,

Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

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

Mr. Steve Leavitt, Director, City of St. Pete: steve.leavitt@stpete.org
Mr. Steve Marshall, Project Manager, City of St. Pete: sdmarsha@stpete.org
Mr. Andrew Westfall, Black & Veatch: westfallAA@bv.com
Mr. Ajay N. Kasarabada, Black & Veatch: KasarabadaAN@bv.com
Ms. Kelley Boatwright, SWD: Kelley.m.boatwright@dep.state.fl.us
Ms. Heather Ceron, US EPA Region 4: ceron.heather@epa.gov

JFK/dlr/ttm