FINAL DETERMINATION

PERMITTEE

Solid Waste Authority of Palm Beach County
7501 North Jog Road
West Palm Beach, Florida 33412

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Final Permit Nos. 0990234-021-AC & 0990234-022-AV
North County Regional Resource Recovery Facility

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility to reflect the refurbishment of the two existing municipal solid waste combustors (Units 1 and 2) previously authorized by Permit No. 0990234-015-AC/PSD-FL-108H and to incorporate minor revisions from Permit No. 0990234-021-AC/PSD-FL-108J.

The Title V air operation permit was processed using a parallel review.

PUBLIC NOTICE

A Written Notice of Intent to Issue Air Permits to Solid Waste Authority of Palm Beach County for the North County Regional Resource Recovery Facility located in Palm Beach County at 7501 North Jog Road, West Palm Beach, Florida, was clerked on November 21, 2011. The Public Notice of Intent to Issue Air Permits was published in the Palm Beach Post on November 30, 2011. The draft/proposed Title V air operation permit and the draft AC/PSD permit revision were available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice of Intent to Issue Air Permits was received on December 5, 2011.

COMMENTS

On November 21, 2011, the Department informed US EPA Region 4 that the Title V air operation permit was being processed using a parallel review. US EPA Region 4 was notified of the publication date of the Public Notice on November 30, 2011.

No comments on the permits were received from the public during the 30-day public comment period. Comments on the permits were received from the applicant during the 30-day public comment period. The comments are addressed below. Additions to the permit are indicated below by double underline. Deletions from the permit are indicated below by ~~strike through~~. All changes are emphasized with yellow highlight in the electronic document.

Letter from the Applicant, Solid Waste Authority of Palm Beach County dated and received on December 16, 2011

Comments

DRAFT Permit 0990234-021-AC/PSD-FL-108J & PSD-FL-108A

1. Section 2, Permit Revisions, page 4 of 5, PSD-FL-108A, Specific Condition No. 4 – This condition lists the pollutants that shall be tested for EU001 & EU002 on a calendar year basis (no less than 9 calendar months and no more that 15 calendar months following the previous performance test) for particulate matter, nitrogen oxides (NOx), carbon monoxide, lead, mercury, sulfur dioxide (SO_2), opacity, and dioxin/furans. It appears that the pollutant

cadmium (Cd) is missing from the list. We request that the PSD permit be revised accordingly by adding it to the list to be consistent with the Title V Air Permit for the facility.

***Response*:** Specific Condition No. 4 is corrected to read as follows:

> "4. Each unit shall be tested within 180 days of issuance of this permit to demonstrate compliance with emission standards for all pollutants mentioned in specific condition No. 3. Thereafter, testing shall occur on a calendar year basis, (no less than 9 calendar months and no more than 15 calendar months following the previous performance test for Particulate Matter, NO_X, Carbon Monoxide, Lead, Mercury, Cadmium, SO_2, Opacity and Dioxins/Furans. Five performance tests must be completed in each 5-year calendar period)."

2. Section 2, Permit Revisions, page 4 of 5, PSD-FL-108A, Specific Condition No. 4 – The request to change the testing frequency of VOC emissions was granted by the Department. The condition states that *compliance with the VOC limit shall be demonstrated by compliance with the Carbon Monoxide limit in lieu of stack testing, but should the Department feel that the VOC limit is not being met, a special compliance test could be required.* The facility has two permit limits for CO: 200 ppmvd [24-hour average] and 400 ppmvd [4-hour block average]. We are asking that the Department clarify which permit limit (or both) for CO is being used to demonstrate compliance for VOC emissions and to revise the permit accordingly.

***Response*:** The Department intended both CO limits be used to show compliance with the VOC limit. Specific Condition No. 4 is corrected to read as follows:

> "Compliance with the VOC limit shall be demonstrated by compliance with ~~the~~ both Carbon Monoxide limits in lieu of stack testing, but should the Department feel the VOC limit is not being met, a special compliance test could be required."

3. Section 2, Permit Revisions, page 4 of 5, PSD-FL-108A, Specific Condition No. III.A.17c – This condition states that *compliance tests for Beryllium (Be) and Fluorides (F) may be conducted at the next regularly scheduled test deadline as specified in the current Title V Air Operation Permit.* Based upon a past EPA determination, Be and F permit limits and testing were removed from the Title V Air permit as a part of the recent permit renewal process. We request that the PSD permit be revised accordingly to be consistent with the Title V Air Permit for the facility.

***Response*:** The Department agrees. Specific Condition No. 4 is corrected to read as follows:

> "c. Reserved. ~~Compliance tests for beryllium and fluorides may be conducted at the next regularly scheduled test deadline as specified in the current Title V air operation permit.~~"

DRAFT/PROPOSED Permit 0990234-022-AV

4. Page III.A.-10, Specific Condition A.30 VOC Emissions Testing - The request to change the testing frequency of VOC emissions was granted by the Department. The condition states that *compliance with the VOC limit shall be demonstrated by compliance with the Carbon Monoxide limit in lieu of stack testing, but should the Department feel that the VOC limit is not being met, a special compliance test could be required.* The facility has two permit limits for CO: 200 ppmvd (24-hour average) and 400 ppmvd (4-hour block average). We are asking that the Department clarify which permit limit (or both) for CO is being used to demonstrate compliance for VOC emissions and to revise the permit accordingly.

***Response*:** Specific Condition **III.A.30.** is corrected to read as follows:

> "VOC Emission Testing. Compliance with the VOC limit shall be demonstrated by compliance with ~~the~~ both Carbon Monoxide limits in lieu of stack testing, but should the Department feel the VOC limit is not being met, a special compliance test could be required."

5. Table 2 Summary of Compliance Requirements – During the recent Title V Air operation permit renewal process, fluoride (F) emission limits and testing requirements for EU001 & EU002 were removed from the permit. However, it appears that F was inadvertently left on Table 2. We request that F limit and testing requirements be removed from table 2 as there is no longer any fluoride emission limit in the permit.

***Response*:** All reference to fluoride has been removed from Table 2 Summary of Compliance Requirements for EU001 and EU002.

6. 099023-015-AC/PSD-FL-108H Condition 18b. Test Reports – This condition states, "*For each required cadmium, dioxin/furan, lead, mercury, and PM test run, the permittee shall also record and report the actual ACI rate, lime injection rate, and temperature data for the fabric filter system."* We are requesting that this condition be added to the Title V Air Operation Permit so that it is consistent with the PSD permit.

AND

7. 099023-015-AC/PSD-FL-108H Condition 18d. Test Reports – This condition states, "*For each required hydrochloric acid test run, the permittee shall also record and report the actual lime injection rate [Rule 62-297.310(8), F.A.C."* We are requesting that this condition be added to the Title V Air Operation Permit so that it is consistent with the PSD permit.

***Response*:** Specific Condition **III.A.29.** is changed to read as follows:

> "A.29. Annual Compliance Test. The owner or operator shall conduct a performance test for PM, opacity, Cd, Hg, Pb and D/F emissions on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests in each 5-year calendar period). For each required cadmium, dioxin/furan, lead, mercury, and PM test run, the permittee shall also record and report the actual ACI rate, lime injection rate, and temperature data for the fabric filter system. The owner or operator shall conduct a performance test for HCl emissions on an annual basis. For each required hydrochloric acid test run, the permittee shall also record and report the actual lime injection rate. [Rule 62-297.310(8), F.A.C. [Rules 62-297.310(7) & 62-204.800(9)(b)7., F.A.C. and PSD-FL-108A, specific condition 4. and PSD-FL-108H]"

CONCLUSION

The comments were not considered significant enough to reissue the draft/proposed Title V air operation permit and the draft AC/PSD permit revision, and to require another Public Notice. The final action of the Department is to issue the final Title V air operation permit with the administrative corrections and/or clarifications and the final AC/PSD permit revision as noted above.