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. 0990234-019-AC & 0990234-020-AV
North County Regional Resource Recovery Facility

The purpose of this permitting project is to renew the Title V air operation permit for the above referenced facility and to incorporate minor revisions from Permit No. 0990234-019-AC, issued concurrently with this permit.

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 August 16, 2011. The Public Notice of Intent to Issue Air Permits was published in the Palm Beach Post on August 20, 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 August 23, 2011.

COMMENTS

On August 16, 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 August 23, 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 CDM (the consultant on behalf of the Applicant, Solid Waste Authority of Palm Beach County) dated and received on September 13, 2011

Comments

1. Title V Air Operation Permit - Specific Condition III.A.21. The applicant requested the second sentence of the excess emissions specific condition be revised to reflect "three (3)-hours per occurrence" originating from the PSD permit, PSD-FL-108A.

***Response*:** Specific Condition **III.A.21.** is corrected to read as follows:

> "**A.21.** Excess Emissions Allowed - Startup, Shutdown or Malfunction. Excess emissions resulting from startup, shutdown or malfunction shall be permitted providing (1) best operational practices to minimize emissions are

adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. The Department authorizes three hours per occurrence in any 24-hour period for these emissions units. A malfunction means any unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. [Rules 62-210.700(1) & (5), F.A.C. and PSD-FL-108A, specific condition 15.]"

2. Title V Air Operation Permit - Specific Condition III.A.29. The applicant requested the last sentence of the annual compliance test specific condition be revised to reflect the "annual" test frequency language specifically from the PSD permit, PSD-FL-108A.

***Response*:** Specific Condition **III.A.29.** is corrected 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). The owner or operator shall conduct a performance test for HCl emissions on an annual basis ~~(no more than 12 calendar months following the previous performance test)~~. [Rules 62-297.310(7) & 62-204.800(9)(b)7., F.A.C. and PSD-FL-108A, specific condition 4.]"

3. Title V Air Operation Permit - permitting note after Specific Condition III.D.12. The applicant requested the less than or equal to sign be corrected to a greater sign.

***Response*:** The permitting note after Specific Condition **III.D.12.** is corrected to read as follows:

"**Emission Limitations and Operating Requirements**

{Permitting note: This "existing" stationary CI engine with ~~<~~> 500 HP does not have a specific numerical emission limitations and standards.}"

4. Title V Air Operation Permit - Specific Condition III.D.58. The applicant requested the referenced engine be corrected to the "Biosolids Pelletization Facility (BPF) (EPA Tier 3 certified)" engine.

***Response*:** Specific Condition **III.D.58.** is corrected to read as follows:

"**D.58.** The following emission standards and limitations apply to E.U. ID No. 016, Emergency Generator - ~~Administration (EPA Tier 1 certified)~~Biosolids Pelletization Facility (BPF) (EPA Tier 3 certified): …"

5. Title V Air Operation Permit - Specific Condition III.C.21. The applicant requested a permitting note be added after the CAM specific condition to mirror what is at the bottom of the approved CAM Plan on Page CAM-5 of 5.

***Response*:** Specific Condition **III.C.21.** is clarified by adding the following permitting note to read as follows:

"**C.21.** Compliance Assurance Monitoring (CAM) Requirements. Each sludge dryer RTO train is subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; and, Rules 62-204.800 & 62-213.440(1)(b)1.a., F.A.C.]

{Permitting note: The excursion level specified in the approved CAM Plan was established based upon the initial PM test data (September 2009) and the manufacture's recommendations. The excursion level shall be re-evaluated at the time of permit renewal based upon the new most recent test data and the manufacture's recommendations.}"

6. Title V Air Operation Permit - Specific Condition III.C.21. The applicant requested a permitting note be added to "Appendix 40 CFR 61 Subpart M" to clarify that the asbestos requirements (conditions) apply to the landfills.

***Response*:** "Appendix 40 CFR 61 Subpart M" is clarified by adding the following permitting note to read as follows:

E.U. ID No.	Brief Description
004	Class III Landfill and Flare (1,800 scfm, manufactured by LFG Specialties,

	model number PCF820I8)
008	Class I Landfill and Flare (3,500 scfm, manufactured by Shaw LFG Specialties, model number CF1238I10)

{Permitting note: These conditions apply to the Class I and III municipal solid waste landfills with active and/or inactive asbestos waste disposal sites.]

Other Department Initiated Corrections

The Department made corrections in the final Title V air operation permit.

1. Title V Air Operation Permit - Specific Conditions III.D.53. & III.D.69. There was a typographical error in the referenced Appendix.

Specific Conditions **III.D.53.** & **III.D.69.** are corrected to read as follows:

"**#.##.** NSPS Requirements - Subpart A. These emissions units shall comply with all applicable requirements of 40 CFR 60, Subpart A, General Provisions, including:

…

which have been adopted by reference in Rule 62-204.800(8)(d), F.A.C.; except that the Secretary is not the Administrator for purposes of 40 CFR 60.4, 40 CFR 60.8(b)(2) and (3), 40 CFR 60.11(e)(7) and (8), 40 CFR 60.13(g), (i) and (j)(2), and 40 CFR 60.16. The applicable 40 CFR 60, Subpart A, General Provisions to which these emissions are subject to are found at 40 CFR 63.4218 and are included in **Appendix 40 CFR 60 Subpart ~~III~~A**. [Rule 62-204.800(8)(d), F.A.C.]"

2. Title V Air Operation Permit - Specific Condition III.D.73. There was a typographical error in the referenced Appendix.

Specific Condition **III.D.73.** is corrected to read as follows:

"**D.73.** 40 CFR 63 Requirements - Subpart A. These emissions units shall comply with all applicable requirements of 40 CFR 63, Subpart A, General Provisions, which have been adopted by reference in Rule 62-204.800(11)(d)1., F.A.C., except that the Secretary is not the Administrator for purposes of 40 CFR 63.5(e), 40 CFR 63.5(f), 40 CFR 63.6(g), 40 CFR 63.6(h)(9), 40 CFR 63.6(j), 40 CFR 63.13, and 40 CFR 63.14. The applicable 40 CFR 63, Subpart A, General Provisions to which these emissions are subject to are found at 40 CFR 63.6665 and are included in **Appendix 40 CFR 63 Subpart ~~ZZZZ~~A**. [Rule 62-204.800(11)(d)1., F.A.C.]"

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.