TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

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

Palm Beach Renewable Energy Park
Facility ID No. 0990234

PROJECT

Draft Permit No. 0990234-028-AC/PSD-FL-413B
Application for Minor Source Air Construction (AC) Permit
Palm Beach Renewable Energy Facility No. 2
Revisions to Previously Issued AC/PSD Permits

COUNTY

Palm Beach County, Florida

PERMITTING AUTHORITY

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

July 29, 2013

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control - General Provisions); 62-210 (Stationary Sources - General Requirements); 62-212 (Stationary Sources - Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources - Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

The existing Palm Beach Renewable Energy Park (PBREP) is a municipal solid waste (MSW) facility categorized under Standard Industrial Classification Number (No.) 4953. The existing facility is located in Palm Beach County at 7501 North Jog Road in West Palm Beach, Florida.

This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

This project will affect the following emissions units (E.U.):

Facility ID No. 0990234

E.U. ID No.	E.U. Brief Description
024	Municipal Solid Waste Combustor No. 3
025	Municipal Solid Waste Combustor No. 4
026	Municipal Solid Waste Combustor No. 5
027	Lime Storage Silo A
028	Lime Storage Silo B
029	Lime Storage Silo C
030	Activated Carbon Storage Silo
031	351 hp Diesel Fire Pump Engine A
032	351 hp Diesel Fire Pump Engine B
033	2,500 Kilowatt (kW) Emergency Generator
034	Ash Handling System and Building

Facility Regulatory Categories

- The existing PBREP and the new PBREF-2 are major sources of HAP.
- The existing PBREP and the new PBREF-2 are not subject to the acid rain provisions of the Clean Air Act (CAA).
- The existing PBREP is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The existing PBREP is a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.

- The new PBREF-2 is a modification of a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.
- The new PBREF-2 is subject to New Source Performance Standards (NSPS) under Section 111 of the CAA and National Emissions Standards for Hazardous Air Pollutants (NESHAP) under Section 112 of the CAA which are incorporated by reference in Chapter 62-204.800, F.A.C.

Project Description

The applicant applied on May 23, 2013, to the Department for a minor source air construction permit. The minor source air construction permit is for revisions to the previously issued air construction (AC)/Prevention of Significant Deterioration (PSD) permits, Permit Nos. 0990234-017-AC/PSD-FL-413 & 0990234-023-AC/PSD-FL-413A (Project).

Application Processing Schedule

Application for Air Construction Permit received on May 23, 2013 (complete application).

{Documents specifically related to this project are posted and available on the Department's world wide web site at http://appprod.dep.state.fl.us/air/emission/apds/default.asp by entering the project number shown above.}

Relevant Document(s)

- Technical Evaluation & Preliminary Determination for Permit No. 0990234-017-AC/PSD-FL-413 dated November 15, 2010
- Permit No. 0990234-017-AC/PSD-FL-413
- Technical Evaluation & Preliminary Determination for Permit No. 0990234-023-AC/PSD-FL-413A dated December 2, 2011
- Permit No. 0990234-023-AC/PSD-FL-413A

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" (SERs) defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as PM; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the increase in emissions from the project exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

3. APPLICANT REQUEST

Background - Requested Revisions

The applicant applied on May 23, 2013, to the Department for a minor source air construction permit. The minor source AC permit is for revisions to the previously issued air construction (AC)/ Prevention of Significant Deterioration (PSD) permits, Permit Nos. 0990234-017-AC/PSD-FL-413 & 0990234-023-AC/PSD-FL-413A (Project).

The applicant submitted very specific requested changes (revisions) in the "Attachment C - Proposed Permit Modifications" document attached to the air permit application received on May 23, 2013. {This document is posted and available on the Department's world wide web site at http://appprod.dep.state.fl.us/air/emission/apds/default.asp , simply enter the project number.}

PSD Applicability for Project

No changes to the air pollutant emission limits for the MWCs were requested in the application.

The applicant provided air pollutant emission estimates for the proposed new auxiliary cooling tower {see Table B-2 in the "Attachment B - Emission Calculations" document of the air permit application} and for the larger diesel fire pump engines {see Table B-1 in the "Attachment B - Emission Calculations" document of the air permit application}. Emission estimates from the revised ash handling building air pollution control system (wet scrubber) and from the reduction in the maximum heat input rate for the natural gas burner system were not provided.

4. DEPARTMENT REVIEW

Background - Requested Revisions (Project)

Permit No. 0990234-017-AC/PSD-FL-413 which was issued on December 23, 2010, was the original AC/PSD permit for the three 1,000 TPD mass-burn MWC units and the associated ancillary equipment.

Permit No. 0990234-023-AC/PSD-FL-413A was issued on January 6, 2012. This project modified the original AC/PSD permit by increasing the size of the emergency equipment and the size of one fuel oil storage tank, changing the number designations of the three new MWC at the PBREF-2 and removing the maintenance & testing time restriction to the emergency equipment. For ease of reference to an up-to-date and complete permit document, this AC/PSD permit project reflects those previously issued modifications made in Permit No. 0990234-023-AC/PSD-FL-413A.

The contractor selected to construct and operate the facility updated design specifications that require permit revisions

authorizing: (a) a reduction in the maximum heat input rate for the natural gas burner system; (b) an increase in the size of the diesel fire pump engines; (c) a different type of air pollution control system for the facility's ash handling building; and, (d) the installation of an auxiliary cooling tower. Also, as part of this request the Authority requested changes to the mercury (Hg) monitoring and testing requirements specified in the permit for the municipal waste combustors (MWCs).

PSD Applicability for Project

PSD applicability is reviewed for this Project by evaluating the individual items and their total effect on air pollutant emissions from the requested revisions (Project). The specific requested revisions were previously mentioned. Each individual item is further addressed below.

(a) Reduction in the Maximum Heat Input Rate for the Natural Gas Burner System

The applicant requested a reduction in the maximum heat input rate for the natural gas burner system. The natural gas system is used as auxiliary fuel during startup and/or shutdown of the MWCs or for flame stabilization.

The applicant has requested that the maximum heat input to each MWC unit from the natural gas burner system to be reduced from the current permit limit of 246 MMBtu/hour to 167 MMBtu/hour. This is about a 32% reduction in heat input.

An overall decrease in the quantity of natural gas combusted would result in lower emissions from the combustion of natural gas. The reduction in the maximum heat input rate for the natural gas burner system should result in air pollutant decreases in emissions from the MWCs.

(b) Increase in the Size of the Diesel Fire Pump Engines

Based on what the applicant provided air pollutant emissions potentially change from the increase in the size of the diesel fire pump engines. Table 1 below shows the individual air pollutants and potential changes in emissions.

Table 1. Emission Changes from Increase in the Size of the Diesel Fire Pump Engines

Air Pollutant	Annual Emissions, Tons per Year (TPY)		
	Diesel Fire Pump Engines in PSD-FL-413	Proposed Diesel Fire Pump Engines	Change in Emissions Potential Increase (+) or Decrease (-)
CO	0.07	0.030	-0.04
NO_X	0.14	0.208	+0.068
PM	< 0.01	< 0.01	Neg. [1]
PM_{10}	< 0.01	< 0.01	Neg. [1]
$PM_{2.5}$	< 0.01	< 0.01	Neg. [1]
SO_2	< 0.01	< 0.01	Neg. [1]
VOC	< 0.01	< 0.01	Neg. [1]

[1] "Neg." represents negligible increase in emissions.

As shown in the Table 1, NOx emissions could slightly increase with the proposed selected larger diesel fire pump engines while CO emissions decrease.

(c) Different Type of Air Pollution Control System for the Facility's Ash Handling Building

To minimize particulate matter (PM) emissions from ash handling equipment, the original PSD permit required the use of a fabric filter (FF) baghouse, through which air from the ash handling building was to be routed prior to venting to the atmosphere.

Since the ash will be wetted to a moisture content level in the approximate range of 20-25%, fugitive particulate matter emissions for the ash handling building are expected to be negligible. To further minimize any PM emissions

from the ash management building, ventilation air will be routed to the air pollution control device (wet scrubber) prior to discharge to the atmosphere.

In lieu of a FF baghouse, the contractor is planning to install a wet scrubber system for emissions control. The applicant has indicated that a high efficiency Whirl Wet® dust collection system from Tri-Mer Corporation controls PM typically in the 99%+ range. This efficiency is about the same or better than the previously proposed baghouse at 99%+. Emissions were neither estimated in the original PSD permit application nor this air permit application.

Therefore, no change in PM emissions is expected from using the proposed wet scrubber in lieu of the baghouse.

(d) Installation of a New Auxiliary Cooling Tower

Based on what the applicant provided new air pollutants are emitted from the installation of a new auxiliary cooling tower. Table 2 below shows the individual air pollutants and potential changes in emissions.

Table 2. Emission Changes from Installation of a New Auxiliary Cooling Tower

Air Pollutant	Annual Emissions, Tons per Year (TPY)		
	Quantity of Emissions Accounted for in PSD-FL-413	New Auxiliary Cooling Tower	Change in Emissions Potential Increase (+) or Decrease (-)
PM	0	0.93	+0.93
PM_{10}	0	0.14	+0.14
$PM_{2.5}$	0	0.14	+0.14

As shown in the Table 2, emissions increase slightly with the installation of a new auxiliary cooling tower.

Summary of the PSD Applicability Analysis for Project

The Technical Evaluation & Preliminary Determination document for the original PSD permit, PSD-FL-413, had a table for PSD applicability for the new PBREF-2, named "Table 4." As seen from reviewing this table, PSD had been triggered for the following air pollutants of concern to this Project: CO, NOx, PM and PM_{10}. CO and NOx emissions had significantly exceeded their respective PSD SERs.

The total potential changes to air pollutants of concern for this Project are shown in Table 3 below.

Table 3. Summary of the PSD Applicability Analysis for this Project

Air Pollutant	Annual Emissions, Tons per Year (TPY)			PSD SER [1]	PSD Applicability Affected?
	Original PSD, PSD-FL-413, (Table 4 values) Total Emissions	Total change for this Project's Emissions	Revised PBREF-2 Total		
CO	435.1	-0.04	435.06	100	No, still PSD.
NO_X	402.2	+0.068	402.268	40	No, still PSD.
PM	56.1	+0.93	57.03	25	No, still PSD.
PM_{10}	56.1	+0.14	56.24	15	No, still PSD.
$PM_{2.5}$	56.1	+0.14	56.24	10	No, still PSD.

[1] PSD significant emission rate (SER) in tons per year (TPY).

As shown by Table 3, the changes to emissions from this Project have no effect on the original PSD applicability. Based on what the applicant provided overall air pollutant emissions from this Project are very close to the previously estimated values for the entire new PBREF-2.

The requested changes (revisions) overviewed here appear generally in the same order as stated in the "Attachment C - Proposed Permit Modifications" document. The requested changes are grouped to the extent possible. The applicant showed proposed additions with double-underlines and proposed deletions with ~~strikethroughs~~ in the "Attachment C."

Subsection 3.A. Municipal Solid Waste Combustors Units 1, 2, and 3 (E.U. ID Nos. 024, 025 and 026) Revisions

(a) Reduction in the Maximum Heat Input Rate for the Natural Gas Burner System.

Applicant's Requested Changes (Revisions):

The contractor's current design indicates that the maximum heat input from the natural gas burner system will be 167 MMBtu/hr.

Department's Responses:

The original PSD permit did not contain any specific restrictions on the natural gas burner system besides citing the maximum heat input in the description and specific condition 3.9.

The requested changes are made.

Subsection 3.C. Diesel Fire Pump Engines (E.U. ID Nos. 031 and 032) Revisions

(b) Increase in the Size of the Diesel Fire Pump Engines.

Applicant's Requested Changes (Revisions):

The applicant indicated that the contractor's design now calls for an increased maximum design rating of 351 hp each for the two diesel fire pump engines to satisfy local fire department codes.

Department's Responses:

The increase in the size of the emergency equipment requires a new BACT determination; however, it does not change the applicability of any other state or federal regulations.

The original BACT determination was that the emergency equipment must meet the requirements of NSPS 40 CFR 60, Subpart IIII - Stationary Compression Ignition Internal Combustion Engines. Subpart IIII contains limits on CO, PM, SO_2 and NOx plus NMOC. The SO_2 emission limit was met by using ultra low sulfur distillate fuel oil with a sulfur content less than or equal to 0.0015 percent. All other emission limits were mass-based as a function of power output, e.g., grams per hp-hour or grams per kilowatt-hour.

NOx emissions could slightly increase with the proposed selected larger diesel fire pump engines while CO emissions may decrease from the proposed selected engines. Differences in air pollutant emissions can be explained not just by the size of an engine, but, also attributed to the engine manufacturer, i.e., the design of an engine. The original engine manufacturer was for Cummings Inc. engines {see Table B-5 in the original PSD air permit application}. The new engine manufacturer is for John Deere Co. engines {see Table B-1}.

The previous BACT, i.e., requirement to meet NSPS 40 CFR 60, Subpart IIII requirements, is still valid for the proposed engines. The requested changes are made, increasing the sizes of the fire pump engines.

Subsection 3.E. Ash Handling System and Building (E.U. ID No. 034) Revisions

(c) Different Type of Air Pollution Control System for the Facility's Ash Handling Building.

Applicant's Requested Changes (Revisions):

The applicant requested the use of a different type of air pollution control system for the facility's ash handling building. Specifically, the applicant has requested the use of a wet scrubber system instead of a fabric filter (FF) baghouse.

The applicant indicated that a wet scrubber system is believed to be more suitable in light of certain drawbacks associated with a FF baghouse system for this application. These issues include corrosion concerns with respect to a FF baghouse system's carbon steel components and potential for "blinding" (plugging) of the bag filters

given the humid conditions expected in the ash handling building due to moisture evaporation from warm bottom ash collected. In contrast, the humid air will not adversely affect the performance of wet scrubber systems, which have reliably been used for effective control of PM emissions from ash handling building exhaust air at other waste-to-energy facilities.

Department's Responses:

The applicant indicated that the proposed wet scrubber, a high efficiency Whirl Wet® dust collection system from Tri-Mer Corporation, controls PM typically in the 99%+ range. This efficiency is about the same or better than the previously proposed baghouse at 99%+. As previously indicated in the PSD applicability section of this document, no change in PM emissions is expected from using the proposed wet scrubber in lieu of the baghouse.

The Whirl Wet® system has been permitted by the Department for PM control of ash handling operations at other Florida waste-to-energy facilities including the North Broward, McKay Bay, Hillsborough County and Pinellas County WTE facilities.

The previous BACT review, a building enclosure for ash handling with additional PM control, is still valid for the proposed wet scrubber.

The majority of the requested changes are made, allowing the use of a wet scrubber instead of a fabric filter (FF) baghouse for additional PM control. Emission specifications, control device monitoring techniques and initial compliance testing are kept to provide the Department reasonable assurances that PM emissions are in fact negligible.

Section 1. GENERAL INFORMATION Revisions

(d) Installation of an Auxiliary Cooling Tower.

Applicant's Requested Changes (Revisions):

As part of the design development process, an auxiliary water-cooled system has now been included in the contractor's design to provide auxiliary cooling of minor loads (such as generator cooling and other critical cooling), while the main air-cooled condenser will handle the primary function of steam condensing as originally planned. The auxiliary cooling tower will have a total circulating flow rate of 4,420 gallons per minute and will contain two cells. The unit's design incorporates drift eliminators which will minimize PM emissions. As shown in Attachment B, maximum annual PM emissions are estimated to be 0.93 tons per year and PM_{10} and $PM_{2.5}$ emissions are estimated to be 0.14 tons per year from the auxiliary cooling tower.

The applicant believe this auxiliary unit is exempt from permitting requirements based on the permit exemption levels defined in Rule 62-210.300(3)(b), F.A.C.

Department's Responses:

This activity was not included in the original PSD permit application. Had this activity been included in the original PSD permit application, a BACT review may have been done since this activity is a source of PM emissions, even though the level of particulate matter emissions are small at 0.93 TPY of PM and 0.14 TPY of PM_{10} and $PM_{2.5}$.

Consistent with other BACTs for cooling towers, drift eliminators are typically proposed to be installed and specified in the permit. Other information like the circulating flow rate and number of cells is also mentioned.

The project description is updated to mention the new proposed auxiliary cooling tower along with the drift eliminators to be installed and the other descriptive information.

Subsection 3.A. Municipal Solid Waste Combustors (MWCs) Units 1, 2, and 3 (E.U. ID Nos. 024, 025 and 026) Revisions

Mercury Monitoring and Stack Testing Requirements for the MWCs.

Applicant's Requested Changes (Revisions):

The applicant requested revisions to the mercury (Hg) monitoring and stack testing requirements for the three MWCs.

The original Permit No. 0990234-017-AC/PSD-FL-413 requires Hg CEMS and quarterly Hg stack testing on each of the three (3) new MWC units. The applicant requests that a Hg CEMS to be installed on only one of the new MWC units and requests a reduction of the Hg stack testing frequency.

The applicant provided very detailed justification for the requested revisions in the cover letter for the permit application, see pages 3-6 of the letter {the cover letter document is posted and available on the Department's world wide web site at http://appprod.dep.state.fl.us/air/emission/apds/default.asp , simply enter the project number}.

Department's Responses

As indicated by the applicant, the 3 proposed new MWC units are regulated under the new NSPS 40 CFR 60, Subpart Eb for large new MWC "subset ii" (40 CFR 60.52b(a)(5)ii) unit's Hg standard of 50 µg/dscm. The only other NSPS 40 CFR 60, Subpart Eb large new MWC "subset ii" regulated unit is at the Hillsborough County Resource Recovery Facility (HCRRF) - the new Unit 4 (also referred to as "HCRRF Unit 4").

Conclusions on Mercury Monitoring and Stack Testing Requirements for the MWCs

The specific requested revisions to the Hg monitoring and testing requirements for the three MWCs are shown in "Attachment C - Proposed Permit Modifications" document.

For consistency among the large new MWC "subset ii" (40 CFR 60.52b(a)(5)ii) units in Florida, the PBREF-2 mercury monitoring and stack testing requirements in the PSD/AC permit can be aligned somewhat with the HCRRF Unit 4's most recently revised Hg monitoring and stack testing requirements established in that PSD/AC permit.

Actual MWC performance with regard to Hg emissions will be known after the first two years of operation. The quarterly stack testing can provide a good indication of Hg emissions.

Department's Hg CEMS Changes (Revisions)

The majority of the specific requested revisions to the Hg CEMS requirements for the three MWCs as shown in "Attachment C - Proposed Permit Modifications" document are made. The statement excluding the use of Hg CEMS data for compliance is not inserted into the permit.

Department's Hg Stack Testing Changes (Revisions)

The majority of the specific requested revisions to the Hg testing requirements for the three MWCs as shown in "Attachment C - Proposed Permit Modifications" document are made.

Subsection 3.A. Municipal Solid Waste Combustors (MWCs) Units 1, 2, and 3 (E.U. ID Nos. 024, 025 and 026) Revisions

Dioxins/furans (D/F) BACT To Be Determined Limits for the MWCs.

Applicant's Requested Changes (Revisions):

The applicant requested a clarifying sentence to be added to specific condition 3.A.16. regarding the setting of the D/F BACT limits for the 3 MWC units.

Department's Responses:

A PSD BACT determination was required for D/F emissions. The installation and operation of the SCR system represented BACT for D/F emissions. The establishment of a numerical limit was required as part of the BACT.

The footnote 7 to the table in specific condition 3.A.16. of the original Permit No. 0990234-017-AC/PSD-FL-413 indicates during the first year of the PBREF-2 operation a 10 ng/dscm limit applies. A subsequent limit is to be determined after D/F stack testing and SCR efficiency tests have been performed.

The emission standards/limits shown in specific condition 3.A.16. of Permit No. 0990234-017-AC/PSD-FL-413, apply to each individual MWC unit.

The applicant has indicated that the MWC units will be constructed identically (i.e., same design features and steam production capacity, will be fabricated of identical materials of construction by the same contractor, and will be equipped with identical air pollution control systems, including activated carbon injection (ACI) for mercury emissions control.).

A clarifying sentence is added to the second paragraph of specific condition 3.A.16. to clearly indicate that a single D/F limit will be established to apply to each individual MWC unit.

5. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state rules and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions.

Mr. Scott M. Sheplak, P.E. is the permit processor responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting him by telephone at 850/717-9074 or by e-mail at scott.sheplak@dep.state.fl.us in the Department's Office of Permitting and Compliance at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Reference Documents on File Related to this Project

1. World wide web site. State of Florida, Department of Environmental Protection. Solid Waste Authority of Palm Beach County Palm Beach Renewable Energy Facility No. 2 (PBREF-2) expansion project. Application. PSD Air Permit Application Report. Posted and available at http://www.dep.state.fl.us/air/emission/bioenergy/palm_beach.htm.

2. World wide web site. State of Florida, Department of Environmental Protection. Hillsborough County Resource Recovery Facility. Hillsborough County Resource Recovery Facility Unit 4. Posted and available at http://www.dep.state.fl.us/air/emission/construction/hillsborough.htm.

3. World wide web site. State of Florida, Department of Environmental Protection. Air Permit Documents Search web page. Permit No. 0570261-013-AC. Permitting documents and associated scanned documents. Posted and available at http://appprod.dep.state.fl.us/air/emission/apds/default.asp.

4. World wide web site. State of Florida, Department of Environmental Protection. Air Permit Documents Search web page. Permit No. 0570261-013-AC. Hillsborough County Resource Recovery Facility. Hillsborough County Resource Recovery Facility Unit 4. Permitting documents and associated scanned documents. Covanta Hg CEMS Report dated April 19, 2013. Posted and available at http://arm-permit2k.dep.state.fl.us/psd/0570261/U0001005.pdf.