

Memorandum

Florida Department of  
Environmental Protection

TO: Buck Oven

THRU: Clair Fancy *C. F.*  
John Brown *J. Brown*  
Preston Lewis *PL 5/3/94*

FROM: John Reynolds *JR*

DATE: May 3, 1994

SUBJ: North Broward Resource Recovery Facility -  
Request for Modification of Site Certification PA 86-22

Our completeness and sufficiency review indicates that the following additional information is needed for further processing of the subject request:

1. The flow diagram for the ash recycling processing facility (page B4) shows a baghouse vent coming from the downleg of the ash storage silo but does not show a separate mixer vent. Please indicate if the mixer is directly vented to the baghouses.
2. Please identify equipment shown on page B4 (if any) that is part of the existing ash handling/lime silo system.
3. The calculated baghouse inlet/outlet grain loadings of 3.0/0.004 gr/ACF may be considerably lower than actually experienced, potentially resulting in emissions approaching or exceeding PSD significance levels. Fairly recent BACT determinations for bulk processing of similar materials have been based on outlet grain loadings of about 0.010 gr/ACF. It is obvious that PSD applicability will enter the picture here at about 0.0085 gr/ACF. Consequently, the Department needs additional information to show that the emission estimates provided by Rust Engineering are based either on vendor guarantees or actual data which support the assumed grain loadings.

JR/bb