From:	Faller, Chuck
To:	Arif, Syed
Cc:	Svec, Ed; Turnbull, Nicole; Porter, Timothy
Subject:	RE: Wheelabrator North and South Broward
Date:	Friday, February 08, 2013 7:16:22 AM

Thanks for the help.

From: Arif, Syed [mailto:Syed.Arif@dep.state.fl.us]
Sent: Thursday, February 07, 2013 3:51 PM
To: Faller, Chuck
Cc: Svec, Ed; Turnbull, Nicole; Porter, Timothy
Subject: RE: Wheelabrator North and South Broward

Mr. Faller,

Thanks for bringing this issue to our attention.

We have discussed this internally and hopefully can correct your Title V permits for both the facilities through an administrative correction.

We need to make sure that none of the changes that we will make in the Title V permit through an administrative correction has an underlying AC permit condition supporting it, otherwise that AC permit would have to be changed.

Ed Svec of my staff will keep you informed.

Thanks,
Syed

Syed Arif, P.E.
Environmental Administrator
Division of Air Resource Management
Office of Permitting and Compliance
Syed.Arif@dep.state.fl.us
(850) 717-9039

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.
From: Faller, Chuck [mailto:cfaller@WM.com]
Sent: Thursday, February 07, 2013 3:11 PM
To: Arif, Syed
Cc: Svec, Ed; Turnbull, Nicole; Porter, Timothy
Subject: Wheelabrator North and South Broward

Mr Arif,

I have been reviewing the Title V permits for Wheelabrator North Broward (permit # 0112120-013-AV) and Wheelabrator South Broward (permit # 0112119-015-AV) and found what I believe to be minor discrepancies that I was hoping could be corrected through an administrative amendment for each facility.

1) In both permits, condition A.39 lists a table titled "Reporting Schedule". In this Table the information required to be maintained at the facility for Condition A.44. (natural gas and fuel oil), A.45. (Charging Rate Monitoring) and A.46. (Segregated Solid Waste Record Keeping) appears to indicate that the information has to be submitted to the Department on a monthly and/or daily basis. This Condition A.39 table would appear to be inconsistent with Conditions A.44, 45 and 46 which require the data to be maintained at the facility, but not submitted to the Department. Additionally, a daily submittal seems slightly problematic, logistically speaking. Is it possible to remove this Table altogether and list the condition as "Reserved"? Or is it possible to remove Natural Gas, Charging Rate and Segregated Loads from the Table? Or is it possible to reword the Table so that "Reporting Deadline" is changed to "Reporting Frequency" and the statement about being submitted to the Compliance Authority removed or edited?

2) Also, for the North Broward permit only, Condition A.7.d lists that mercury is controlled at the facility by source separation techniques. While that is true today, the purpose of the recent Title V revision was to allow for the installation of an activated carbon system. This condition's inclusion appears to be an oversight that I was hoping could be corrected. Could the condition be removed or the wording be amended to reflect the upcoming carbon injection system, similar to condition A.35?

I appreciate your consideration on these minor discrepancies and would appreciate any guidance you could provide on how to proceed. Thank you.

Chuck Faller
Environmental Manager
Wheelabrator North Broward
954-971-8701, ext 216

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