

-66-



**PLEASE DELIVER THE FOLLOWING PAGES TO:**

<b>DATE:</b> 04/26/01		
<b>NAME:</b>	Scott Sheplak	
<b>ENTITY / FIRM:</b>	Department of Environmental Protection	
<b>TELEPHONE:</b>	<b>OFFICE #:</b> (850) 921-9532	<b>FAX #:</b> (850) 922-6979
<b>FROM:</b>	Mary Beth Mihalik, Environmental Compliance Coordinator <i>MBM</i>	

**TOTAL NUMBER OF PAGES INCLUDING COVER SHEET:   2**

**COMMENTS:**

The North County Resource Recovery Facility (NCRRF) is proposing to change the existing hydraulic rain fuel feed system to a direct gravity feed system in the 2001 Fall outage. Attached you will find a response letter from FDEP stating that these changes could be performed without a PSD Permit modification because the feed rates, unit capacity, or utilization of the municipal waste combustor are not likely to increase. Per our conversation, it is my understanding that the Title V Air Operating Permit will not need to be modified for this project.



# Department of Environmental Protection

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APR 23 2001

ENVIRONMENTAL PROGRAM

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

April 20, 2000

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APR 23 2001

ENVIRONMENTAL PROGRAM

Marc C. Bruner, Ph.D.  
Director, Planning and Environmental Programs  
Solid Waste Authority  
7501 North Jog Road  
West Palm Beach, FL 33412

Re: Solid Waste Authority, Palm Beach County  
RDF Municipal Waste Combustor  
Minor Modification of RDF Feed System

Dear Mr. Bruner:

This letter summarizes our meeting (Marc Bruner, Joe Kahn, and Jeff Koerner) yesterday morning in Tallahassee. The SWA is considering changing the refuse-derived fuel (RDF) feed system for the municipal waste combustors from the existing hydraulic ram feed system to a direct gravity feed system. The proposed changes include removal of the hydraulic feed ram, plate work to make the direct feed hopper, changing the conveyor pocket plate lengths, and adding a discharge deflector plate with shut-off device. The purpose of these changes is to reduce the operational and maintenance costs and prevent RDF from "rolling into bales". The changes are relatively minor and can be performed during a normally scheduled outage. The cost of the modifications will not be capitalized because they are comparatively low and will decrease overall operation and maintenance costs.

We agreed that the proposed changes could be performed without a PSD permit modification because they are not likely to increase the feed rates, unit capacity, or utilization of the municipal waste combustors. However, I recommend that you review the description of the feed system as identified in the site certification and determine whether a revision of the site certification might be required. Please call if you have any other questions.

Sincerely,

Jeff Koerner  
New Source Review Section

cc: Joe Kahn, DEP-EMS  
Al Linero, DEP-NSRS  
Isidore Goldman, DEP-SED  
Jim Stormer, PBCHD

"More Protection, Less Process"

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## Sheplak, Scott

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**From:** Sheplak, Scott  
**Sent:** Wednesday, April 11, 2001 10:25 AM  
**To:** Long, Terri  
**Cc:** Tittle, Thomas; 'mmhalik@swa.org'; Fancy, Clair  
**Subject:** RE: North County Resource Recovery Facility Title V Permit (0990234-001-AV)

**Terri,**

**Below are my responses to your e-mail. My responses are shown below your questions in bold.**

1. Condition A.1.0. Permitted Capacity: The table indicates a Steam Flow Rate of 324,000 lb/hr with note (a) referencing a 4 hr block (see condition R.14.) Should that be see condition R.19.?

**Yes, thank you. I'll correct this with an admin. permit correction.**

2. This permitted capacity referenced above is not the actual permitted operational capacity (for compliance purposes) but the "emission units rated capacity" for the purpose of testing within 90-100% of the "rated" capacity. Is this correct?

**Yes.**

3. The actual "permitted capacity" is defined in O.3(8) which states that the "maximum demonstrated municipal waste combustor unit load" shall be determined during the latest dioxin/furans test (highest 4 hr avg). NCRRF completed their stack test in Jan and the results for Unit 1 and Unit 2 are 313.7 Klb/hr and 310.3 Klb/hr respectively. Based on O.1. which states "No owner or operator of an affected facility shall cause such facility to operate at a load level greater than 110 percent of the maximum demonstrated municipal waste combustor unit load as defined in specific condition A.2., except as specified below.", I am assuming that they can operate up to 110% of 313.7 and 310.3. Is that correct?

**No. There are several limiting factors on a unit's rate of operation: 1) The rate at which they operated during the last successful dioxin/furan compliance test, and 2) The design rated capacity mentioned in the emissions unit description and condition A.1.0. The design rated capacity should not be exceeded. This value is the upper limit for which PTE was established. If a permittee routinely exceeds this value they need to apply for the higher capacity.**

4. Condition T.12 states " Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90-100% of the maximum operation rate allowed by permit". For the MWC's under the new NSPS, the way I understand it is that the maximum operation rate allowed by permit is defined during the latest dioxin/furans test as per condition A.2. This doesn't seem to make sense. If they tested at 90-100% of the rate which had been determined in the latest dioxin test it seems that their permitted load would slowly be decreasing. Should this condition use the "emission units rated capacity" (324,000 Klb/hr) rather than the "permitted capacity" (variable)?

**See above 3. response. In response to your concern of "load decreasing," each time the permittee does a test the operation rate starts a new clean slate.**

5. There are also similar problems with the inlet control device temperature limit. Please look at condition R.18, O.2, and O.3(9).

**See above 3. response.**

Please call if you need any additional clarification.

-----Original Message-----

**From:** Long, Terri  
**Sent:** Wednesday, March 28, 2001 2:05 PM  
**To:** Sheplak, Scott  
**Cc:** Tittle, Thomas; 'mmhalik@swa.org'  
**Subject:** North County Resource Recovery Facility Title V Permit (0990234-001-AV)

Hi Scott,

Could you please clarify the following conditions of the Title V permit.

1. Condition A.1.0. Permitted Capacity: The table indicates a Steam Flow Rate of 324,000 lb/hr with note (a)

referencing a 4 hr block (see condition R.14.) Should that be see condition R.19.?

2. This permitted capacity referenced above is not the actual permitted operational capacity (for compliance purposes) but the "emission units rated capacity" for the purpose of testing within 90-100% of the "rated" capacity. Is this correct?
3. The actual "permitted capacity" is defined in O.3(8) which states that the "maximum demonstrated municipal waste combustor unit load" shall be determined during the latest dioxin/furans test (highest 4 hr avg). NCRRF completed their stack test in Jan and the results for Unit 1 and Unit 2 are 313.7 Klb/hr and 310.3 Klb/hr respectively. Based on O.1. which states "No owner or operator of an affected facility shall cause such facility to operate at a load level greater than 110 percent of the maximum demonstrated municipal waste combustor unit load as defined in specific condition A.2., except as specified below.", I am assuming that they can operate up to 110% of 313.7 and 310.3. Is that correct?
4. Condition T.12 states " Testing of emissions shall be conducted with the emissions unit operation at permitted capacity, which is defined as 90-100% of the maximum operation rate allowed by permit". For the MWC's under the new NSPS, the way I understand it is that the maximum operation rate allowed by permit is defined during the latest dioxin/furans test as per condition A.2. This doesn't seem to make sense. If they tested at 90-100% of the rate which had been determined in the latest dioxin test it seems that their permitted load would slowly be decreasing. Should this condition use the "emission units rated capacity" (324,000 Klb/hr) rather than the "permitted capacity" (variable)?
5. There are also similar problems with the inlet control device temperature limit. Please look at condition R.18, O.2, and O.3(9).

I appreciate any insight you have into applying these conditions for compliance purposes.

Thank You  
Terri Long  
SED-WPB

## Sheplak, Scott

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**From:** Sheplak, Scott  
**Sent:** Wednesday, April 11, 2001 10:57 AM  
**To:** Long, Terri  
**Subject:** FW: Undeliverable: RE: North County Resource Recovery Facility Title V Permit (0990234-001-AV)

RE: North County

Resource Reco... Please ensure that mmhalik is aware of this.

-----Original Message-----

**From:** System Administrator [mailto:postmaster@swa.org]  
**Sent:** Wednesday, April 11, 2001 10:25 AM  
**To:** Sheplak, Scott  
**Subject:** Undeliverable: RE: North County Resource Recovery Facility Title V Permit (0990234-001-AV)

Your message

**To:** Long, Terri  
**Cc:** Tittle, Thomas; mmhalik@swa.org; Fancy, Clair  
**Subject:** RE: North County Resource Recovery Facility Title V Permit (0990234-001-AV)  
**Sent:** Wed, 11 Apr 2001 10:24:50 -0400

did not reach the following recipient(s):

mmhalik@swa.org on Wed, 11 Apr 2001 10:25:07 -0400

The recipient name is not recognized

The MTS-ID of the original message is: c=us;a=

;p=FLORIDADEP;l=TLHEXSMB1-010411142450Z-1081

MSEXCH:IMS:Solid Waste Authority of PBC:SWA Kingdom:ATHENA 0 (000C05A6)

Unknown Recipient



Jeb Bush  
Governor

# Department of Environmental Protection

Southeast District  
P.O. Box 15425  
West Palm Beach, Florida 33416

David B. Struhs  
Secretary

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MAR 16 2001

BUREAU OF AIR REGULATION

March 14, 2001

Mr. Donald L. Lockhart, Executive Director  
Solid Waste Authority of Palm Beach County  
North County Resource Recovery Facility  
7501 North Jog Road  
West Palm Beach, Florida 33412

RE: Composting Facility Bio-Filters (Permit No. 0990234-001-AV)

Dear Mr. Lockhart:

The Department has become aware that the bio-filters servicing the Composting Facility have recently been decommissioned and removed. Although the Composting Facility is listed as an Insignificant Emissions Unit under the Title V permit (Permit No 0090234-001-AV), there are questions which arise with the removal of the bio-filters.

Under Section II of the Title V permit, Facility Wide Conditions, Condition 2. States, "General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contributes to an objectionable odor. (Rule 62-296.320(2), F.A.C.)

It is the Department's understanding that one of the purposes of the design of the bio-filters was to reduce potential problem odors from migrating offsite. Based on this understanding, the Department would like to know if and when the bio-filters will be replaced. If the bio-filters are not going to be replaced, what type of odor control will be installed/instituted in their (bio-filters) place?

The Department would like to thank you in advance for cooperation in this matter, as we are trying to prevent a potential future problem. If you have any questions, please call Ms. Terri Long at (561) 681-6625.

Sincerely,

Tom Tittle  
Air Compliance/Enforcement Supervisor

Cc: DEP, WPB Domestic Waste  
DEP, WPB Solid Waste  
DEP, Tallahassee Title V Section

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**Sheplak, Scott**

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**From:** Sheplak, Scott  
**Sent:** Tuesday, March 06, 2001 3:35 PM  
**To:** Long, Terri  
**Cc:** Lurix, Joe; Tittle, Thomas  
**Subject:** RE: Recording Segregated Loads

Terri,

Condition A.4.8. of the final permit (0990234-001-AV) states "The total quantity of the following non-MSW material received as segregated loads and burned at the facility shall not exceed 5%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined by using a rolling 30 day average."

Compliance with the segregated load requirement can be done by the total.

Scott

-----Original Message-----

**From:** Long, Terri  
**Sent:** Thursday, March 01, 2001 7:16 AM  
**To:** Sheplak, Scott  
**Cc:** Lurix, Joe; Tittle, Thomas  
**Subject:** FW: Recording Segregated Loads

Scott,

Please review the questions from SWA PBC (0990234-001-AV) concerning segregated loads and the details required in the record keeping required in the Title V permit. The permit requires not more than 3% of waste tires and 5% of segregated loads daily on a 30 day rolling avg. I would think that one waste code for "segregated" loads (other than waste tires) would be sufficient.

Thanks  
Terri Long  
SED

-----Original Message-----

**From:** Mark L. McLean [mailto:mmclean@swa.org]  
**Sent:** Tuesday, February 27, 2001 12:15 PM  
**To:** Long, Terri  
**Subject:** Recording Segregated Loads

Terri,

Could you please clarify this for me: I realize that waste tires must be tracked separately, but do we need to identify what each segregated load consists of? For example, do we need to keep track of EACH segregated load, such as construction & demolition debris, oil spill debris, consumer-packaged products, and other segregated waste materials; or can we just group all of the segregated loads together under one waste code?

I would appreciate any guidance you could offer on this.

Thanks,

Mark McLean