



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

December 27, 1999

Mr. Richard Statom, Assistant Director
Environmental Programs
Solid Waste Authority of Palm Beach County
7501 North Jog Road
West Palm Beach, FL 33412

Re: DRAFT Title V Permit No.: 0990234-001-AV
Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility

Dear Mr. Statom:

On December 14, 1999, the department received a request for an extension of time to file comments on the subject permit due to its length and complexity.

The public notice was published on December 3, 1999. The public comment period ends January 3, 2000. The department has reviewed the request and hereby extends the public comment period an additional 30 days to February 2, 2000.

If you should have any further questions, please contact me at 850/921-9532.

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott M. Sheplak".

Scott M. Sheplak, P.E.
Administrator
Title V Section

SMS/ek

cc: Donald Lockhart, Solid Waste Authority of Palm Beach County
Ronald Larson, P.E., HDR Engineering, Incorporation
Isidore Goldman, Southeast District
James Stormer, Palm Beach County



YOUR PARTNER FOR
SOLID WASTE SOLUTIONS

December 13, 1999

Mr. Scott Sheplak
Florida Department of
Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399-2400

RECEIVED

DEC 14 1999

BUREAU OF AIR REGULATION

Re: Request for Extension of Time to File
Comments Concerning Draft Title V
Permit for Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility
DEP Draft Permit No. 0990234-001-AV

Dear Scott:

This letter is a request for an extension of time for the Solid Waste Authority of Palm Beach County (Authority) to file comments concerning the Department of Environmental Protection's (Department) Draft Title V Air Operations Permit (Draft Permit) for the Authority's North County Resource Recovery Facility (NCRRF) (DEP Draft Permit No. 0990234-001-AV).


The Authority published notice of the Department's "Intent to Issue Title V Air Operation Permit" on December 3, 1999, therefore, the Authority's comments would be due on January 3, 1999. However, due to the length and complexity of the Draft Permit and the upcoming holidays, the Authority requires additional time to carefully review the Draft Permit with its staff, its consultants, and the company that operates the NCRRF.

The Authority requests an extension of time of 30 days until February 2, 2000 to file comments concerning the Draft Permit. The Authority understands that this extension of the comment period will also apply to comments from the public. Accordingly, once the Authority receives written notification from the Department that the comment period has been extended, the Authority will publish notice of the extension of time to file comments. Please provide me a copy of the Department's written notification with regard to this request by facsimile at (561) 683-4067.

Mr. Scott Sheplak
December 13, 1999
Page 2

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact us.

Sincerely,



Richard A. Statom
Assistant Director
Environmental Programs

cc: Don Lockhart, SWA
Marc Bruner, SWA
John Booth, SWA
Mary Beth Mihalik, SWA
Bob Worobel, SWA
John Ryberg, SWA
Naren Narendra, PBRRC
Ray Schauer, Malcolm Pirnie
Scott Shannon, Malcolm Pirnie

12/15/99 cc: Scott Sheplak

THE PALM BEACH POST
 Published Daily and Sunday
 West Palm Beach, Palm Beach County, Florida

PROOF OF PUBLICATION

STATE OF FLORIDA
 COUNTY OF PALM BEACH

Before the undersigned authority personally appeared Tyler Dixon who on oath says that she is Classified Advertising Manager, Inside Sales of The Palm Beach Post, a daily and Sunday newspaper published at West Palm Beach in Palm Beach County, Florida; that the attached copy of advertising, being a Notice in the matter of Intent in the --- Court, published in said newspaper in the issues of December 3, 1999.

Affiant further says that the said The Post is a newspaper published at West Palm Beach, in said Palm Beach County, Florida, and that the said newspaper has heretofore been continuously published in said Palm Beach County, Florida, daily and Sunday and has been entered as second class mail matter at the post office in West Palm Beach, in said Palm Beach County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she/he has neither paid nor promised any person, firm or corporation any discount rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

30

Sworn to and subscribed before this 3 day of December A.D. 1999

Meredith E Minus

Personally known XX or Produced Identification
 Type of Identification Produced _____



RECEIVED
 DEC 06 1999
 ACCOUNTING

RECEIVED

DEC 14 1999

12/14/99 cc: Scott Sheplak

BUREAU OF AIR REGULATION

NO. 035313
 PUBLIC NOTICE OF INTENT
 TO ISSUE TITLE V
 AIR OPERATION PERMIT
 STATE OF FLORIDA
 DEPARTMENT OF
 ENVIRONMENTAL
 PROTECTION
 TITLE V DRAFT Permit No.
 030224-01-AV
 North County Resource
 Recovery Facility
 Palm Beach County
 Department of Environmental
 Protection (permitting
 authority) gives notice of its
 intent to issue a Title V air
 operation permit to South Waste
 Authority of Palm Beach County
 for the North County Resource
 Recovery Facility, located at 6501 North Jog Road,
 West Palm Beach, Palm Beach
 County. The applicant's name
 and address are: Donald L.
 Lockhart, South Waste Authority
 of Palm Beach County,
 North County Resource Recovery
 Facility, West Palm Beach,
 Florida 33412.
 The permitting authority will
 issue the Title V PROPOSED
 Permit, and subsequent Title V
 FINAL Permit, in accordance
 with the conditions of the Title
 V DRAFT Permit unless a request
 is received in accordance
 with the following procedure:
 The permitting authority will
 accept written comments concerning
 the proposed Title V DRAFT
 Permit for a period of 30 (thirty) days
 from the date of publication of
 this notice. Written comments
 should be provided to the Department's
 Bureau of Air Regulation, 2900
 Blair Stone Road, Mail Station #5506,
 Tallahassee, Florida 32399-2400.
 Any written comments filed
 shall be made available for
 public inspection. If written
 comments received result in a
 significant change in the DRAFT
 Permit, the permitting authority
 shall issue a Revised DRAFT
 Permit and request, if applicable,
 a public hearing. Persons who
 are substantially interested
 (as affected) by the proposed
 permitting decision may petition
 for an administrative hearing in
 accordance with Sections 120.559
 and 120.57 of the Florida Statutes
 (FS). The petition must contain
 the information set forth
 below and must be filed (received)
 in the Office of General Counsel
 of the Department of Environmental
 Protection, 3900 Commonwealth
 Boulevard, Mail Station #35,
 Tallahassee, Florida 32399-3000
 (Telephone: 904/487-4938; Fax:
 904/487-4938). Petitions
 filed by any persons other
 than those entitled to written
 notice under Section 120.503,
 FS, must be filed within
 fourteen days of publication
 of the public notice or
 within fourteen days of receipt
 of the notice of intent, whichever
 occurs first. Under Section
 120.503, FS, however, any
 person who is entitled to
 the permitting authority for notice
 of agency action may file a
 petition within fourteen days
 of receipt of that notice. In
 preparation of the date of publication
 of a permit, the applicant shall
 a copy of the permit to the
 applicant at the address as
 indicated above. If the permit
 is issued, the name of any person
 to file a petition within the
 applicable time period shall be
 published in the permit. The
 permit shall be issued only if an
 administrative determination
 has been made under Sections
 120.559 and 120.57, FS, or
 to persons in the proceeding
 and benefits as a party to
 the permitting process. Intervention
 will be only at the approval
 of the permitting officer
 upon the filing of a motion in
 accordance with Rule 28-
 100.200 of the Florida Administrative
 Code (F.A.C.).
 A person who is denied the
 permit shall be subject to the
 permitting authority's action is
 subject shall contain the following
 information:

Florida 33401
 Telephone: 561/681-6800
 Fax: 561/681-6755
 The complete project file includes
 the DRAFT Permit, the application,
 and the information submitted by
 the responsible official, exclusive of
 confidential records under
 Section 408.011, F.S. Interested
 persons may contact Scott M.
 Sheplak, P.E. at the above
 address, or call 561/681-
 6532, for additional information.
 /s/ Sandra J. Bourhan
 Records Manager
 PUBLISHED: Friday
 December 3, 1999
 Palm Beach Post

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address and telephone number of the petitioner; name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief;

(f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and,

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section

7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation
111 South Magnolia Drive
Suite 400
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979
Affected District
/Local Program:
Department of Environmental Protection
Southeast District Office
400 North Congress Avenue
West Palm Beach,

RECEIVED

DEC 14 1999

SOLID WASTE AUTHORITY



OF PALM BEACH COUNTY

7501 North Jog Road
West Palm Beach, Florida 33412-2414
Telephone: 561/640-4000 • Fax: 561/640-3400

LETTER OF TRANSMITTAL

TO: Scott Sheplak, P.E. Date: December 10, 1999
Florida Department of Environmental Protection Attention:
2600 Blair Stone Road Ref:
Tallahassee, FL 32399-2400 PO/Bid/Contract No.:

ATTACHED PLEASE FIND:
COPY OF LETTER SPECIFICATIONS
CONTRACT CSA BID No.:
PURCHASE ORDER CHANGE ORDER No.:

Table with 2 columns: ITEM #, DESCRIPTION. Row 1: 1 & 2, Original and one (1) copy of Proof of Publication of "Public Notice of Intent to Issue Title V Air Operation Permit" for North County Resource Recovery Facility (Draft Permit No. 0990234-001-AV)

THESE ARE TRANSMITTED as checked below:

Form with checkboxes for transmission options: For your information, For your signature, Please return to my attention, etc. Includes a field for 'FOR BIDS/RFP DUE' with a date.

COMMENTS: section with multiple blank lines for text entry.

COPY TO: Richard Statom, SWA
SIGNED: [Signature]
TITLE: Environmental Compliance Coordinator

FILENAME:

FORM: SWA-TRAN.DOT



YOUR PARTNER FOR
SOLID WASTE SOLUTIONS

RECEIVED

DEC 01 1999

BUREAU OF AIR REGULATION

November 24, 1999

Mr. Scott Sheplak
Professional Engineer Administrator
Title V Section, Air Resources Division
Florida Department of Environmental Protection
2600 Blair Stone Road MS 5510
Tallahassee, FL 32399-2400

Re: Solid Waste Authority of Palm Beach County - North County Resource
Recovery Facility Draft Title V Permit

Dear Mr. Sheplak,

The Solid Waste Authority of Palm Beach County (SWA) received draft Title V permit from the Department on November 4, 1999 for the North County Resource Recovery Facility (NCRRF). We have completed our preliminary review of the draft permit and have the following comments.

- This draft permit does not include several provisions contained in PSD-FL-108A, most notably in **Section III, Subsection A, Emission Limitations and Standards, A.6 - A.20** and in **Section III, Subsection B, Class I and Class III Landfills**. The SWA will be commenting in more detail on these and other sections after the public notice is published.

Cover Page

- The address of the Executive Director is incorrect. The correct address is 7501 North Jog Road, West Palm Beach, FL

Statement of Basis

- **2nd paragraph, 4th sentence:** This sentence seems to imply that the NCRRF has a permitted maximum throughput of 900 tons per day per boiler. This is not the case. The limiting parameter in the PSD permit (PSDFL108A) is a heat input rating of 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs./hr. We suggest the following language to replace the 4th sentence. The

boiler plant includes two B&W boilers, each designed to operate up to a maximum heat input of 412.5 MMBtu./hr with a steam flow rating of 324,000 lbs./hr. At a reference heating value of 5500 Btu/lb., this is equivalent to 900 TPD of RDF per boiler.

- **Third paragraph, 2nd sentence:** The sentence states that the NCRRF is rated at a maximum of 75,000 pounds per hour (900 TPD or 816 megagrams per day). This is not a regulatory limit. The limiting parameter in the PSD permit (PSDFL108A) is a heat input rating of 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs. /hr. . We suggest the following language to replace the 2nd sentence. They are B&W Sterling Boilers and each designed to operate up to a maximum heat input of 412.5 MMBtu./hr with a steam flow rating of 324,000 lbs./hr. At a reference heating value of 5500 Btu/lb., this is equivalent to 75,000 pounds per hour (900 TPD of RDF or 816 megagrams per day) of refuse derived fuel from mixed solid waste per boiler.
- **Third paragraph, 2nd sentence:** The phrase "mixed municipal solid waste" needs expansion. The NCRRF burns refuse derived fuel (RDF). We suggest that the phrase "refuse derived fuel (RDF) from" be added before the term "mixed municipal solid waste". Please see the revised verbiage in the comment above.
- **Third paragraph, 4th sentence:** The boilers share a common outer stack with individual flues, essentially separate stacks together with an outer casing. The SWA suggest the following replacement sentences. The boilers have individual flues contained in a single stack casing. The facility began commercial operation in 1989.

Draft Permit

- **Page 2, Section I. Subsection A. Facility Description, 4th sentence:** This sentence seems to imply that the NCRRF has a permitted maximum throughput of 900 tons per day per boiler. This is not the case. The limiting parameter in the PSD permit (PSDFL108A) is 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs. /hr. We suggest the following language to replace the 4th sentence. The boiler plant includes two B&W boilers, each designed to operate up to a maximum heat input of 412.5 MMBtu./hr with a steam flow rating of 324,000 lbs./hr. At a reference heating value of 5500 Btu/lb., this is equivalent to 900 TPD of RDF per boiler.
- **Page 2, Section I. Subsection A. Facility Description, 5th sentence:** Joy Technologies has been purchased by Babcock & Wilcox (B&W). Replacement equipment ordered from Joy Technologies and installed is currently labeled as B&W.

- **Page 2, Section I. Subsection C. Relevant Documents, 1st sentence:** This sentence is in conflict with 1st page of the permit, which notes that several of the Appendices are made a part of this permit.
- **Page 5, Section II, # 8.g. :** The SWA requests that the word "material" be replaced with the word "waste".
- **Page 6, Section III. Subsection A. Emissions Units and Conditions, 1st paragraph:** This paragraph seems to imply that the NCRRF has a permitted maximum throughput of 900 tons per day per boiler. This is not the case. The limiting parameter in the PSD permit(PSDFL108A) is 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs. /hr. We suggest the following language to replace the 1st paragraph beginning with the 2nd sentence. The boilers are B&W Sterling Power Boilers and each is rated at a heat input of 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs./hr.. At a reference heating value of 5500 Btu/lb., this is equivalent to 900 TPD of RDF (75,000 lbs./hr. or 816 megagrams/day) per boiler. Emissions from the boilers are controlled by spray dryer absorbers and electrostatic precipitators. The boilers have individual flues contained in a single stack casing. The facility began commercial operation in 1989.
- **Page 6, Section III. Subsection A. Emissions Units and Conditions, Essential Potential to Emit (PTE) Parameters, Table A.1.0. Permitted Capacity:** : This table seems to imply that the NCRRF has a permitted maximum throughput of 900 tons per day per boiler. This is not the case. The limiting parameter in the PSD permit(PSDFL108A) is a heat input of 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs. /hr. We suggest that the column labeled **Tons per day** replaced with Steam Flow. The 900 TPD in the column would then be replaced with the 324,000 lbs. /hr steam flow rating approved in the PSD permit. The following statement could be added to the Notes below the table: At a reference heating value of 5500 Btu/lb., this is equivalent to 900 TPD of RDF per boiler.
- **Note "a" below Table A.1.0. states:** " **Annual Facility - wide throughput is 624,000 tons**". This is a number based on a contractual minimum throughput between the SWA and B&W (Contracted Facility Operator), and is not reflective of a regulatory limit. The SWA request that this note be eliminated.
- **Page 6&7, A 1.1. Capacity , (1) (ii) and (2):** These sections deal with boilers that are not based on heat capacity, and as such do not apply to our facility. The SWA request that these sections be removed.
- **Page 7, A.4.0 Methods of Operation - Fuels 2nd sentence:** The requirement that daily charging rates be recorded is not a part of 213.410(1),

PSD-FL-108A, or PA 84-20 as referenced at the end of the section. The SWA request that this sentence be removed.

- **Page 7, A.4.0 & A.4.1. Methods of Operation - Fuels** : Both A.4.0 and A.4.1. discuss mixed MSW as the approved fuel for this facility. It should be noted that the NCRRF combust refuse derived fuel (RDF), which is processed MSW. We suggest that the phrase "refuse derived fuel (RDF) from" be added before the term "mixed municipal solid waste" in these sections.
- **Page 8, A.4.5. (b):** The requirement that the facility install, operate, and maintain CEMS for oxygen is not in accordance with page 30, Section C.1. CEM for Oxygen or Carbon Dioxide which states that CEMS for oxygen or carbon dioxide is required, not both. The SWA request that the phrase "or carbon dioxide" be added to this section.
- **Page 10, A.6. Stack Emissions**: The SWA is unsure of when the emission limitations required by the State Implementation Plan (SIP) are in effect. In the August 13, 1996 letter from Donald Lockhart (SWA Executive Director) the SWA committed to compliance with the 111d Plan within one year of the EPA approval of the plan. To our knowledge the final revised plan has not been approved by EPA. The SWA requests clarification of the effective date of the SIP and the new emissions limitations. Reference 40 CFR 60.39b(c)(1).
- **Page 10, A.8. Visible Emissions**: The SWA request that the following sentence be added from the PSD-FL-108A, Specific Condition #3.k., "CEM readings when the process is not operating shall be excluded from averaging calculations."
- **Page 12, A.19. Carbon Monoxide** : The 1st sentence includes a requirement for oxygen to be measured at the same time as the carbon monoxide. The SWA monitors carbon dioxide and calculates the corrected oxygen value. The SWA request that the phrase "or calculation" be added after the word "measurement".
- **Page 13, E.3.1. Startup, Shutdown, & Malfunction, 1st sentence**: (2) does not appear in this draft permit even though it is referenced. The SWA request that (2) be removed from the 1st sentence.
- **Page 13, E.3.3. Malfunction, 1st sentence**: It should be noted that PSD-FL-108A, Specific Condition # 15, allows for excess emissions up to three(3) hours per occurrence for a malfunction. This condition in PSD -FL-108A constitutes specific authorization by the Department for a longer duration allowance for excess emissions to a maximum of three(3) hours for a malfunction.

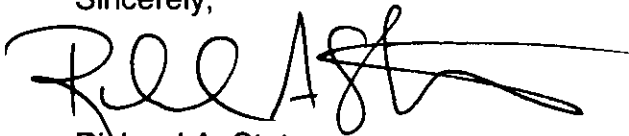
- **Page 27, T.16.2:** There are no test methods listed for Beryllium and Fluoride. PSD-FL-108A list Method 104 for beryllium and Method 13A or 13B for fluoride.
- **Page 37, R.1.7 (b) Test Reports:** The requirement for stack test results to be filed with the Department no later than 45 days after the last sampling run of each test is completed is not practical in the case of dioxins. Dioxin analysis is conducted in such a way that rarely is a 45-day turn around time met by the laboratory.

Additionally, the way this section is written, there is some confusion as to whether the 45-day time clock commences with the last sample on the last day, or with the completion of the first sample run. The SWA suggest the following language. The required test report shall be filed with the Department as soon as practical, but no later than 45 days after the completion of the last test runs of the stack test. Dioxin test data shall be filed with the Department no later than 60 days after the completion of the last test run of the stack test.

- **Page 38, R.21. Continuous Monitoring Program 1st sentence:** The SWA requests that the phrase "or carbon dioxide" be added after the word oxygen in order to be in compliance with Section C.1 which allows either oxygen or carbon dioxide to be used as the diluent monitor.

The SWA looks forward to your response to these comments. If you have any questions or comments, please do not hesitate to contact us.

Sincerely,



Richard A. Statom
Assistant Director
Environmental Programs

- Cc. D. Lockhart, SWA w/o attachments
M. Hammond, SWA w/o attachments
J. Booth, SWA w/o attachments
J. Mesojedec, SWA w/o attachments
B. Worobel, SWA w/o attachments
R. Schauer, Malcolm Pirnie
S. Shannon, Malcolm Pirnie

November 24, 1999

Mr. Scott Sheplak
Professional Engineer Administrator
Title V Section, Air Resources Division
Florida Department of Environmental Protection
2600 Blair Stone Road MS 5510
Tallahassee, FL 32399-2400

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- 3 • **Third paragraph, 2nd sentence:** The sentence states that the NCRRF is rated at a maximum of 75,000 pounds per hour (900 TPD or 816 megagrams per day). This is not a regulatory limit. The limiting parameter in the PSD permit (PSDFL108A) is a heat input rating of 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs. /hr. . We suggest the following language to replace the 2nd sentence. They are B&W Sterling Boilers and each designed to operate up to a maximum heat input of 412.5 MMBtu./hr with a steam flow rating of 324,000 lbs./hr. At a reference heating value of 5500 Btu/lb., this is equivalent to 75,000 pounds per hour (900 TPD of RDF or 816 megagrams per day) of refuse derived fuel from mixed solid waste per boiler.
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Draft Permit

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Replacement equipment ordered from Joy Technologies and installed is currently labeled as B&W.

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11. • **Page 6, Section III. Subsection A. Emissions Units and Conditions, Essential Potential to Emit (PTE) Parameters, Table A.1.0. Permitted Capacity:** This table seems to imply that the NCRRF has a permitted maximum throughput of 900 tons per day per boiler. This is not the case. The limiting parameter in the PSD permit(PSDFL108A) is a heat input of 412.5 MMBtu./hr. at a steam flow rating of 324,000 lbs. /hr. We suggest that the column labeled **Tons per day** replaced with Steam Flow. The 900 TPD in the column would then be replaced with the 324,000 lbs. /hr steam flow rating approved in the PSD permit. The following statement could be added to the Notes below the table: At a reference heating value of 5500 Btu/lb., this is equivalent to 900 TPD of RDF per boiler.
12. • **Note "a" below Table A.1.0. states: " Annual Facility - wide throughput is 624,000 tons"**. This is a number based on a contractual minimum throughput between the SWA and B&W (Contracted Facility Operator), and is not reflective of a regulatory limit. The SWA request that this note be eliminated.
13. • **Page 6&7, A 1.1. Capacity , (1) (ii) and (2):** These sections deal with boilers that are not based on heat capacity, and as such do not apply to our facility. The SWA request that these sections be removed.

- 14 • **Page 7, A.4.0 Methods of Operation - Fuels 2nd sentence:** The requirement that daily charging rates be recorded is not a part of PSD-FL-108A, or PA 84-20 as referenced at the end of the section. The SWA request that this sentence be removed.
- 15 • **Page 7, A.4.0 & A.4.1. Methods of Operation - Fuels :** Both A.4.0 and A.4.1. discuss mixed MSW as the approved fuel for this facility. It should be noted that the NCRRF combust refuse derived fuel (RDF), which is processed MSW. We suggest that the phrase "refuse derived fuel (RDF) from" be added before the term "mixed municipal solid waste" in these sections.
- 16 • **Page 8, A.4.5. (b):** The requirement that the facility install, operate, and maintain CEMS for oxygen is not in accordance with page 30, Section C.1. CEM for Oxygen or Carbon Dioxide which states that CEMS for oxygen or carbon dioxide is required, not both. The SWA request that the phrase "or carbon dioxide" be added to this section.
- 17 • **Page 10, A.6. Stack Emissions:** The SWA is unsure of when the emission limitations required by the State Implementation Plan (SIP) are in effect. In the August 13, 1996 letter from Donald Lockhart (SWA Executive Director) the SWA committed to compliance with the 111d Plan within one year of the EPA approval of the plan. To our knowledge the final revised plan has not been approved by EPA. The SWA requests clarification of the effective date of the SIP and the new emissions limitations. Reference 40 CFR 60.39b(c)(1).
- 18 • **Page 10, A.8. Visible Emissions:** The SWA request that the following sentence be added from the PSD-FL-108A, Specific Condition #3.k., "CEM readings when the process is not operating shall be excluded from averaging calculations."
- 19 • **Page 12, A.19. Carbon Monoxide :** The 1st sentence includes a requirement for oxygen to be measured at the same time as the carbon monoxide. The SWA monitors carbon dioxide and calculates the corrected oxygen value. The SWA request that the phrase "or calculation" be added after the word "measurement".
- 20 • **Page 13, E.3.1. Startup, Shutdown, & Malfunction, 1st sentence:** (2) does not appear in this draft permit even though it is referenced. The SWA request that (2) be removed from the 1st sentence.
- 21 • **Page 13, E.3.3. Malfunction, 1st sentence:** It should be noted that PSD-FL-108A, Specific Condition # 15, allows for excess emissions up to three(3)

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hours per occurrence for a malfunction. This condition in PSD -FL-108A constitutes specific authorization by the Department for a longer duration allowance for excess emissions to a maximum of three(3) hours for a malfunction.

- 22. • **Page 27, T.16.2:** There are no test methods listed for Beryllium and Fluoride. PSD-FL-108A list Method 104 for beryllium and Method 13A or 13B for fluoride.
- 23. • **Page 37, R.1.7 (b) Test Reports:** The requirement for stack test results to be filed with the Department no later than 45 days after the last sampling run of each test is completed is not practical in the case of dioxins. Dioxin analysis is conducted in such a way that rarely is a 45-day turn around time met by the laboratory.

Additionally, the way this section is written, there is some confusion as to whether the 45-day time clock commences with the last sample on the last day, or with the completion of the first sample run. The SWA suggest the following language. The required test report shall be filed with the Department as soon as practical, but no later than 45 days after the completion of the last test runs of the stack test. Dioxin test data shall be filed with the Department no later than 60 days after the completion of the last test run of the stack test.

- 24. • **Page 38, R.21. Continuous Monitoring Program 1st sentence:** The SWA requests that the phrase "or carbon dioxide" be added after the word oxygen in order to be in compliance with Section C.1 which allows either oxygen or carbon dioxide to be used as the diluent monitor.

The SWA looks forward to your response to these comments. If you have any questions or comments, please do not hesitate to contact us.

Sincerely,

Richard A. Statom
Assistant Director
Environmental Programs

Cc. D. Lockhart, SWA w/o attachments
M. Hammond, SWA w/o attachments
J. Booth, SWA w/o attachments
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