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BUREAU OF AIR REGULATION

April 1, 2008

Mr. Scott M. Sheplak, P.E.  
Title V Section  
Florida Department of Environmental Protection  
Bob Martinez Center  
Mail Station #5505  
2600 Blair Stone Road  
Tallahassee, Florida 32399

Subject: Solid Waste Authority of Palm Beach County  
Biosolids Pelletization Facility  
Request for Extension of Permit Number 0990234-006-AC/PSD-FL-108F  
Response to Incompleteness Letter Dated March 28, 2008

Dear Mr. Sheplak:

CDM and the Solid Waste Authority of Palm Beach County (SWA) are in receipt of the Florida Department of Environmental Protection's (FDEP) correspondence, dated March 28, 2008, related to the above-referenced application submitted on March 3, 2008. In response to FDEP's correspondence, CDM (on behalf of SWA) offers the following comments:

**Comment No. 1:** Thank you for providing the construction schedule from the contractor with the submittal. After reviewing the construction schedule it was not clear whether or not construction has commenced. Has construction commenced? And if so, when and what specific activity(ies) have taken place? [See the definitions in Rule 62-210.200, Florida Administrative Code (F.A.C.) for "commence construction" and "construction."]

*Response No. 1:* Construction commenced on December 22, 2006. To date, site work has been completed, the building has been erected, all interior foundations are complete, the major equipment is being set inside of the building, and the roof closure is in progress. The Contractor projects the construction completion date to be December 3, 2008.



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**Comment No. 2:** Thank you for providing the updated best available control technology (BACT) analysis with the submittal. BACT has been proposed by the applicant in the application files on May 4, 2005. The final BACT for this project was issued on February 2, 2006. Is this a "phased construction project" under 40 CFR 52.21(j)(4)?

*Response No. 2:* The project is designed as a single phase of construction. Construction has commenced but has been delayed. The Contractor is not able to meet the construction completion date established in the air construction permit. Therefore, we are requesting a one-year extension of the air construction permit to coincide with the anticipated completion date for the project. No additional phases of construction are anticipated at this time; therefore, the construction project is not a phased project as detailed in 40 CFR 52.21(j)(4).

We trust that these responses satisfy FDEP's comments. If you have any additional questions or comments, please contact me at (561) 689-3336 or barrittam@cdm.com.

Very truly yours,

Amber M. Barritt, P.E.  
Project Manager  
Camp Dresser & McKee Inc.

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Lee Hoefert, P.E., FDEP Southeast District Office, via email Lee.Hoefert@dep.state.fl.us  
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