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DIVISION OF AIR
RESOURCE MANAGEMENT

October 25, 2011

Mr. Jeffery F. Koerner
Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Solid Waste Authority of Palm Beach County
Palm Beach Renewable Energy Facility No. 2
Air Permit No. 0990234-017-AC (PSD-FL-413)
Permit Modification for Emergency Equipment

Dear Mr. Koerner,

Project No: 0990234 -023 -AC -PSD -FL- 413 A

The Solid Waste Authority of Palm Beach County (the Authority) is pleased to submit this permit modification application to request revisions to the air construction permit issued for the Palm Beach Renewable Energy Facility No. 2 (Air Permit No. 0990234-017-AC (PSD-FL-413)). As we have recently discussed with the Department, the project has now entered the detailed design stage. The contractor selected to construct and operate the facility, Babcock & Wilcox (B&W), has provided updated design specifications that will require permit revisions with respect to the emergency generator and diesel fire pump engines planned for the facility. Accordingly, we have enclosed updated permit application forms (Attachment A) and emission calculations (Attachment B) for the emergency generator and diesel fire pump engines.

The Authority is also requesting the permit be amended to revise the emission unit descriptions for the municipal waste combustor (MWC) units. However, please recognize that there are no substantive changes to the permit being requested for the MWC units.

The requested permit revisions are as follows:

- Emergency Generator (EU-033) - Permit Section 3.D., Conditions 3, 4, and 5.

The permit authorizes the installation of a 250 kW (350 hp) emergency generator. The contractor's design specifies a larger emergency generator sized at 2.5 MW (3634 hp). Therefore, a permit revision is requested to specify a 2.5 MW (3634 hp) emergency generator. The contractor has chosen a larger size emergency generator for enhancement of plant and operator safety during periods of emergency operation such as in a situation with complete loss of electrical power. The additional loads to the emergency bus

include an emergency pump for boiler cooling, pump motors associated with B&W's water-cooled grate design, an air compressor for providing air to critical valves, and electric power for the selective catalytic reduction (SCR) system related motorized dampers as examples, among such others. As originally permitted, the generator is designated for use solely in emergency situations with no operating hour restriction for emergency use. It is also understood that the generator is limited to 100 hours per year of operation for maintenance and readiness testing purposes.

Because of the larger sized emergency generator now planned for the facility, the allowable size of the associated fuel oil tank (indicated in Condition 4 of Section 3.D.) is requested to be increased to 3,500 gallons. Also, it is our understanding from our recent discussions that the Department may consider removing the 30-minute testing period restriction specified in Condition 5 of Section 3.D. The Authority requests that the Department consider removing this provision from the permit as it could unintentionally restrict the operator's ability to thoroughly test the emergency unit.

■ Diesel Fire Pump Engines (EU-031 and 032) - Permit Section 3.C., Conditions 3 and 5.

The permit authorizes installation of two diesel fire pump engines, each with a maximum design rating of 250 hp. The contractor's design calls for a slightly larger 305 hp maximum design rating for these units. Therefore, a permit revision is requested to specify a maximum design rating of 305 hp for these units.

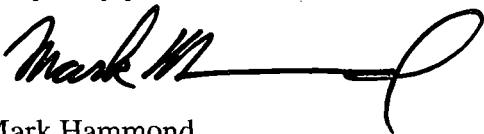
As indicated above for the emergency generator, the Authority is also requesting that the Department consider removing the 30-minute test period restriction for the diesel fire pump engines as specified under Condition 5 of Section 3.C.

■ Emission Unit Description (EU-024, 025, and 026) - Permit Section 1. (pg. 4)

The new combustors are designated as "Municipal Solid Waste Combustor No. 1, No. 2, and No. 3" in the permit. The Authority requests that the permit be amended to designate these new units as "Municipal Solid Waste Combustor No. 3, No. 4, and No. 5". This request is being made to help distinguish the existing combustors currently in operation at the Palm Beach Renewable Energy Park from the new combustors to be installed (the existing combustors are commonly referred to as "Units 1 and 2" in the Authority's internal documents and drawings). Please note that we are not requesting any changes to the Emission Unit ID Numbers specified in the permit.

We look forward to the Department's review of the Authority's proposed permit revisions. If you have any questions concerning the permit application, please contact Mr. Joel Cohn with Malcolm Pirnie/ARCADIS at (757) 873-4411 or via e-mail at Joel.Cohn@arcadis-us.com.

Very truly yours,



Mark Hammond
Executive Director
Solid Waste Authority of Palm Beach County

Attachments: Four (4) copies, Attachment A and Attachment B - Permit Modification Application, Palm Beach Renewable Energy Facility No. 2

cc: M. Bruner
R. Schauer
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