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SEP 19 2011

DIVISION OF AIR
RESOURCE MANAGEMENT

September 13, 2011

Mr. Jonathan Holtom, P.E.
Program Administrator
Title V Section
Division of Air Resource Management
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: North County Resource Recovery Facility
*Revised Draft/Proposed Permit No. 0990234-020-AV, Title V Operation Permit
Renewal*
*Revised Draft Permit No. 099234-019-AC/PSD-FL-108I Air Construction Permit
Revision*
Solid Waste Authority (SWA) of Palm Beach County
Comments on Revised Draft Permits

Dear Mr. Holtom:

On behalf of the SWA, Camp Dresser & McKee Inc. (CDM) is submitting comments on the Revised Draft Title V Air Operation Permit Renewal and Air Construction Permit Revision, for which public notice was published on August 20, 2011. We understand that due to comments submitted on the Draft permits, and some substantial changes to those permits, it has been necessary to withdraw the Draft permits and replace them with these revised permits. We greatly appreciate the Department's efforts in preparing the revised draft permit, and the opportunity to provide the comments, below.

- 1) Revised Draft/Proposed Permit, Page III.A.-5, Condition A.21. We request that the second sentence be revised to read: "The Department authorizes three hours per occurrence for these emissions units." The PSD permit (PSD-FL-108A) that was issued in 1992 states, on Page 10 of 11; Specific Condition 15, that excess emissions shall be limited to "three hours per occurrence." Since the "three hours per occurrence" language was part of the underlying PSD



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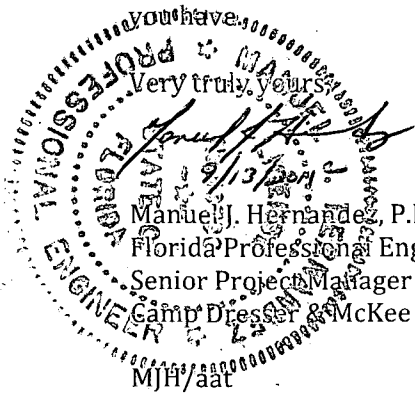
permit for the SWA's facility, the Department cannot reduce the authorized emissions to three hours in a 24 hour period when the Department renews the Title V permit for the SWA's facility. (See email from David Dee to Scott Sheplak, re: SWAPBC Title V Permit, dated August 24, 2011.)

- 2) Revised Draft/Proposed Permit, Page III.A.-7, Condition A.29. We request that the language describing the annual basis for HCl testing be changed to match the language in the underlying 1992 PSD permit (PSD-FL-108A) that states, in Specific Condition 4. on Page 7 of 11, that each unit shall be tested annually. That is, please delete the parenthetical phrase, "(no more than 12 calendar months following the previous performance test)." This interpretation will apply until the U.S. EPA corrects Subpart Eb to include HCl and fugitive ash testing on a calendar year basis, no less than 9 calendar months and no more than 15 calendar months following the previous performance test.
- 3) Revised Draft/Proposed Permit, Page III.D.-7, Condition D.12 Emissions Limitations Permitting Note. The " \leq " should be correct to a ">", so that the category refers to "existing" stationary CI engines with > 500 HP.
- 4) Revised Draft/Proposed Permit, Page III.D.-17, Condition D.58. Please correct the name of this engine to be "Emergency Generator – Biosolids Pelletization Facility (BPF) (EPA Tier 3 certified)." The E.U. ID No 016 is correct, and the applicable emissions standards are correct for the BPF engine generator.
- 5) Appendix CAM, Page CAM-5 of 5. The footnote at the bottom of the page states that the excursion level shall be re-evaluated at the time of permit renewal, based upon the most recent stack test data and the manufacturer's recommendations. We request that this be added as a Permitting Note to Condition C.21 on Page III.C.-3 in the main body of the permit.
- 6) Appendix 40 CFR 61 Subpart M [Set A]. We request that a permitting note be added to this appendix to indicate that the NESHAP 40 CFR 61, Subpart M conditions only apply to the asbestos site at the Class III Landfill (and not to the Class I and Class III Flares).



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Thank you again, and please contact either Cynthia Hibbard (617-452-6244; hibbardcs@cdm.com) or me (561-689-3336; hernandezmj@cdm.com) with any questions.



Manuel J. Hernandez, P.E.
Florida Professional Engineer No. 59796
Senior Project Manager
Camp Dresser & McKee Inc.
MJH/aat

Enclosure

File: 2678-78434.07.01

cc: Mr. Scott Sheplak, FDEP
Mr. Mark Hammond, SWA
Mr. Marc Bruner, SWA
Mr. Mark McLean, SWA
Mr. Bob Worobel, SWA
Mr. Jim Greer, SWA
Mr. Mark Davis, PBRRC
Ms. Mary Beth Morrison, SWA
Mr. Michael Tyson, SWA
Mr. David Broten, SWA
Mr. Michael Thayer, NEFCO
Ms. Cynthia Hibbard, CDM



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DIVISION OF AIR
RESOURCE MANAGEMENT

September 14, 2011

Mr. Jeff Koerner, Administrator
Office of Permitting and Compliance
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road, MS #5505
Tallahassee, FL 32399-2400

Project No. 0990234-021-AC-PSD-FL-108J
0990234-022-AV

Re: North County Resource Recovery Facility Refurbishment Air Construction Permit Number
0990234-015AC/PSD-FL-108H - Final Design Specification Revisions

Dear Mr. Koerner:

Florida Department of Environmental Protection ("Department") issued an Air Construction Permit (permit number 0990234-015AC/PSD-FL-108H) to the Solid Waste Authority of Palm Beach County on September 18, 2009. The permit authorized the refurbishment of the municipal solid waste combustor Units 1 and 2 at the North County Resource Recovery Facility ("NCRRF").

As specified in Condition 2, entitled "Final Design Specifications", of Section 3, entitled "Emissions Unit Specific Conditions", the Authority entered into contractual agreements with the control equipment vendors and provided the Department with final design specifications for the control equipment systems in the letter dated May 21, 2010.

As specified in Condition 3, entitled "Updated Control Equipment Designs", of Section 3, the Authority "shall update the Permitting Authority and Compliance Authority with final design specifications and any substantial changes made to the final design specifications during the actual construction phase." This letter and associated attachments serves to update the Department on the substantial changes made during the construction phase and fulfill this requirement.

The following table identifies the drawing numbers, names, revision number and date of the drawings that were originally submitted, as well as the revision number and date of the most recent drawing revisions. Of the drawings originally submitted, only four have been revised. These revised drawings are being submitted to provide the Permitting Authority and Compliance Authority with the most recent design specifications. The revisions made to documents previously submitted to the Department are summarized briefly in the table below.

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 Florida Department of
 Environmental Protection
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Drawing Number	Drawing Name	Original Submittal (May 21, 2010)		Revised Submittal (September 14, 2011)		
		Revision Number	Date	Revision Number	Date	Change Made
Section 1 - General						
	Refurbishment scope and description	--	5/21/10	--	--	N/A
100-E4-100	Plan view of Facility areas where Refurbishment is occurring	RA	6/26/09	0	9/29/09	Revised drawing notes and added additional note references; added additional building labels.
711-M0-100	Air Pollution Control General Arrangement Plan	D2	1/29/10	--	--	N/A
Section 2 - Boiler Information - Babcock & Wilcox (B&W)						
	B&W Proposal	--	September 2007	--	--	N/A
B0043891	General Arrangement Refurbishment Project SPB with Detroit Stoker Section Side View S-S	4	8/24/09	--	--	N/A
B0043892	General Arrangement Refurbishment Project SPB with Detroit Stoker Section Side View S1-S1	4	8/24/09	--	--	N/A
B0043893	General Arrangement Refurbishment Project SPB with Detroit Stoker Outside Front View A-A	4	8/24/09	5	4/26/10	Added tag numbers for pressure tap connections.
B0043894	General Arrangement Refurbishment Project SPB with Detroit Stoker Section Front View B-B	4	8/24/09	--	--	N/A

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Drawing Number	Drawing Name	Original Submittal (May 21, 2010)		Revised Submittal (September 14, 2011)		
		Revision Number	Date	Revision Number	Date	Change Made
B0043895	General Arrangement Refurbishment Project SPB with Detroit Stoker Section Side View C-C	4	8/24/09	--	--	N/A
B0043922	General Arrangement Refurbishment Project SPB with Detroit Stoker Section Side View S1-S1 and S1A-S1A	2	10/20/09	--	--	N/A
B0043923	General Arrangement Refurbishment Project SPB with Detroit Stoker Section Side View S2-S2 and S2A-S2A	2	10/20/09	--	--	N/A
Section 3 - SDA, FFH, PAC Injection System - Siemens Power Generation, Inc.						
	Excerpts from the Siemens Energy, Inc. Proposal to supply the Spray Dryer Absorber/Fabric Filter and powdered activated carbon (PAC) injection systems	--	5/2/09	--	--	N/A
209D1169	General Arrangement - Elevations Dry Scrubbing System (Spray Dryer Absorber & Fabric Filter)	8	1/26/10	--	--	N/A
209D1171	General Arrangement - Plan Views Dry Scrubbing System (28'-0" Spray Dryer Absorber)	4	11/3/09	--	--	N/A

Mr. Jeff Koerner
 Florida Department of
 Environmental Protection
 September 14, 2011
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Drawing Number	Drawing Name	Original Submittal (May 21, 2010)		Revised Submittal (September 14, 2011)		
		Revision Number	Date	Revision Number	Date	Change Made
209D1173	Arrangement of Baghouse - Plan View Dry Scrubbing System (For JP-FF-1000) (Spray Dryer Absorber & Fabric Filter)	5	12/14/09	--	--	N/A
209D1329-02	Activated Carbon Storage and Delivery System Dry Scrubbing System (Spray Dryer Absorber & Fabric Filter)	5	1/5/10	7	3/23/10	Title Block scale corrected; changed silo base elevation; added pressure transmitter.
711-P0-017	Pollution Control Piping & Instrument Diagram Powdered Activated Carbon Injection - Sys. Des.	A1	8/26/09	D7	9/14/11	General instrumentation revisions made; added silo explosion rupture panels; added equipment tags and identification; updated PAC feeder range to reflect as-built conditions.
Section 4 - SNCR - Combustion Components Associates, Inc.						
	Excerpts from the SNCR Systems for RDF Fired Boilers for Solid Waste Authority of Palm Beach County, FL, SNCR Proposal No. 09-194 Rev 2	--	5/20/09	--	--	N/A
SWAPB_0901_011	SNCR System Process Flow Diagram	0	8/31/09	--	--	N/A

Mr. Jeff Koerner
Florida Department of
Environmental Protection
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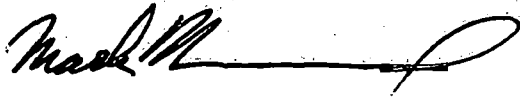
Drawing Number	Drawing Name	Original Submittal (May 21, 2010)		Revised Submittal (September 14, 2011)		
		Revision Number	Date	Revision Number	Date	Change Made
SWAPB_0901_090	Urea Storage Tank	2	11/18/09	--	--	N/A
SWAPB_0901_034	Distribution Module General Arrangement Lower Level Unit No. 1	1	12/9/09	--	--	N/A
SWAPB_0901_030	Urea Metering Module General Arrangement Lower Level Unit No. 1	1	12/5/09	--	--	N/A

Additionally, we will update the Department of any substantial changes to the final design specifications that may occur during the warranty period.

Please do not hesitate to contact us if you need any additional copies or information.

Very truly yours,

SOLID WASTE AUTHORITY OF PALM BEACH COUNTY, FLORIDA



Mark Hammond
Executive Director

Enclosures

cc: L. Anderson, FDEP SE District
R. Schauer, SWA
B. Worobel, SWA
M. Morrison, SWA
W. Arvan, PBRRC
L. Richter, MPI-FTL
P. Patton, MPI-WPB Field Office
K. Liang, MPI-WHI

September 14, 2011



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SEP 16 2011

DIVISION OF AIR
RESOURCE MANAGEMENT

Mr. Jeff Koerner P.E.
Program Administrator
Division of Air Resource Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399

Project No; 0990234 -021 - AC - PSD-FL-108J
0990234 -022 - AV ✓

RE: North County Resource Recovery Facility – Unit 1 and Unit 2 Refurbishment Project
Original Project No. 0990234-015-AC (PSD-FL-108H)
Title V Air Operation Permit Revision Application (No. 0990234-20 AV)
Air Construction Permit Application to modify PSD-FL-108A

Dear Mr. Koerner:

The Solid Waste Authority of Palm Beach County (“SWA”) is the owner of the North County Resource Recovery Facility (“NCRRF”), a large Municipal Waste Combustor, that was originally constructed under air construction permit (No. PSD-FL-108) and operates under Florida Department of Environmental Protection (“FDEP”) Title V Air Operation Permit (No. 0990234-20AV).

On September 18, 2009, the FDEP issued an air construction permit #0990234-015 AC/PSD-FL-108H authorizing a refurbishment project of the NCRRF which included the installation of new air pollution control equipment. The AC permit requires that a Title V Revision application be submitted within 180 days of construction completeness to incorporate these refurbished boilers into the existing Title V permit. On March 24, 2011 the construction completion milestone was reached for the refurbishment project resulting in a permit revision application deadline of September 20, 2011. This permit revision application is submitted within this deadline.

Attached are the following documents for this Title V Air permit revision application:

- Attachment 1: Completed Title V Permit Revision Application Forms
- Attachment 2: Emission Calculations
- Attachment 3: Requested Changes to Title V Air Permit (narrative)
- Attachment 4: Requested Changes to PSD-FL-108A Air Permit (narrative)
- Attachment 5: Compliance Report

The Title V permit revision application includes the request to remove the exhaust gas temperature limit of 300 °F which will result in a temperature limitation of the exhaust gas which is consistent with the NSPS CFR 60 Subpart Cb. This change was authorized in the AC permit

#0990234-015 AC/PSD-FL-108H and it is our understanding that under Rule 62-213.412(2), F.A.C. this condition will become immediately effective once this application is submitted to EPA and FDEP. Also requested is the change in compliance test frequency for VOC from once during the Federal fiscal year to once prior to permit renewal based upon historical data which shows the measured VOC to be significantly below the permit limit. A narrative of these requested changes is provided in Attachment 3.

In addition, this permit package includes an Air Construction Permit Application to modify language in PSD-FI-108A. This application includes the request to change the testing frequency of VOC from annual to 'prior to permit renewal' to be consistent with the requested change to the Title V permit, supported by the historical data, and also to change the testing frequency (Specific Condition 4) of other pollutants to be consistent with the MACT language in current draft Title V permit. A narrative of these requested changes is provided in Attachment 4.

We look forward to working with the FDEP as this application for a Title V operation permit revision and Air Construction Permit application are reviewed. If you have any questions, please contact Mary Beth Morrison at (561) 640 4000 ext 4613.

Yours sincerely,



Mark Hammond
Executive Director
Solid Waste Authority of Palm Beach County

Enclosure

Carol Kemker (EPA Region 4, Atlanta, GA)
Greg DeAngelo (FDEP, Tallahassee)
Lennon Anderson (FDEP Southeast District Office w/o enclosure)
MaryBeth Morrison (SWA)
Leah Richter (Malcolm Pirnie)
Chris Tilman (Malcolm Pirnie)
Bill Arvan (PBRRC w/o enclosure)
Mark Davis (PBRRC w/o enclosure)
Bob Worobel (SWA w/o enclosure)