

From: [David Dee](#)
To: [Read, David](#)
Cc: [Koerner, Jeff](#)
Subject: SWA's Request for Clarification re Residue from C&D Recycling
Date: Thursday, June 11, 2015 9:58:12 AM
Attachments: [image005.png](#)

David,

I am sending you this note to confirm and supplement the information I provided you during our recent telephone conversation. Specifically, I would like to confirm that the Department's requirements governing "segregated loads" of solid waste do not apply when the residue generated from recycling construction and demolition debris ("Residue") is burned at Energy Recovery Facility No. 1 ("REF-1").

Background Information

On December 29, 2014, the Department issued an air construction permit ("Permit") (No. 0990234-032-AC (PSD-FL-413C)) to the Solid Waste Authority of Palm Beach County ("SWA"). The Permit clarified the requirements that apply to the different types of material used as fuel at the SWA's Renewable Energy Facility No. 2 ("REF-2"). Among other things, Specific Conditions 12.b and 12.c of the Permit clarified the requirements that are applicable to segregated loads of construction and demolition debris, waste tires, and other materials, when those materials are received at REF-2.

The Permit also clarified the reporting requirements that apply to segregated loads pursuant to Specific Condition 35.

At the SWA's request, Specific Condition 12.d.i. was added to the Permit. This specific condition address the "combustible residue generated when recycling construction and demolition debris." Specific Condition 12.d.i. provides that the Residue generated from these recycling activities is one of the "authorized fuels" at REF-2. Specific Condition 12.d.i. notes that this Residue includes "wood, plastic, paper, packaging materials, and similar combustible materials, but may also include incidental amounts of noncombustible materials (e.g., concrete)."

The materials in the Residue are fundamentally the same as the materials in municipal solid waste ("MSW"), which is the Facility's primary fuel. For this reason, the Permit for REF-2 allows the Residue to be used in the same manner as MSW. Although the Permit contains limitations on the use of segregated loads (Specific Conditions 12.b and 12.c), and the Permit establishes recordkeeping requirements for segregated loads (Specific Condition 35), these limitations and requirements do not apply at REF-2 when the facility is burning the Residue that is generated from recycling construction and demolition debris.

The SWA has not yet requested the Department to clarify the Department's requirements for the materials used as fuel at the SWA's REF-1. Consequently, the Title V permit for REF-1 (Permit No. 0990234-031-AV) has not yet been revised to include the same type of language that is included in Specific Condition 12.d.i. of the Permit for REF-2.

Given the Department's decision to add Specific Condition 12.d.i. to the Permit for REF-2, the SWA assumes the Department will allow Residue to be burned at REF-1 in the same manner as the Department approved for REF-2. More specifically, the SWA assumes that, when the SWA burns

Residue at REF-1, the SWA does not need to comply with the 5% limitation and the recordkeeping requirements that apply to segregated loads of construction and demolition debris.

The SWA asked me to raise this issue with you because REF-1 recently has been receiving more Residue than normal. The SWA anticipates that REF-1 will continue to receive increased quantities of Residue for the next few months while REF-2 completes its startup, commissioning, and the commencement of commercial operations. Thereafter, most of the Residue will be delivered to REF-2, instead of REF-1.

Conclusion

In light of the facts set forth above, please send me an e-mail confirming that the SWA does not need to comply with the Department's requirements for segregated loads when the SWA receives Residue at REF-1.

Thank you for your prompt attention to this issue.

Let me know if you have any questions.

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