



1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
tel: 561 689-3336
fax: 561 689-9713

February 7, 2008

Mr. Alvaro Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

FEB 11 2008

BUREAU OF AIR REGULATION

Subject: Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility Site
Biosolids Pelletization Facility
Time Extension Request for Air Construction Permit (Permit No. 0990234-008-AC)

Dear Mr. Linero:

This letter is in reference to FDEP Air Construction Permit Number 0990234 and PSD-FL-108F for the construction of a Biosolids Pelletization Facility (BPF) at the North County Resource Recovery Facility Site. The air pollution construction permit for the BPF has an expiration date of March 31, 2008. At this time, the construction of the facility is not completed. The contractor's current construction schedule indicates that construction should be completed by December 1, 2008, copy attached. On behalf of the Solid Waste Authority, CDM hereby requests a one-year extension of the air pollution construction permit for the BPF.

Additionally, no design or construction changes have occurred to date that would effect the air emissions calculations or the Best Available Control Technology analysis previously submitted.

We would be happy to provide any additional information you may need to process this request. Please contact me at any time with such requests at (561) 689-3336 or barrittam@cdm.com.

Very truly yours,

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

Mr. Alvaro Linero, P.E.
February 7, 2008
Page 2

Enclosure

c: Mike Halpin, P.E., FDEP, Florida Energy Office
Cindy Mulkey, FDEP, Florida Energy Office
Russell Wider, FDEP, Bureau of Air Regulation
Lee Hoefert, FDEP, Southeast District
John O'Malley, PBC Health Department
Ray Schauer, SWA
Patrick Carroll, SWA
Mary Beth Morrison, SWA
Kevin Leo, P.E., BCEE, CDM
Alex Makled, P.E., BCEE, CDM
Jill Grimaldi, CDM
Cynthia Hibbard, CDM

File: 2678-46715-079

Sheplak, Scott

-file-

From: Koerner, Jeff
Sent: Thursday, February 21, 2008 10:58 AM
To: Koerner, Jeff; 'Grimaldi, Jill'
Cc: 'Barritt, Amber'; 'Hibbard, Cynthia'; Wider, Russell; Sheplak, Scott
Subject: RE: Time Extension Request for Permit No. 0990234-008-AC

Sorry, Russell's e-mail address is: Russell.Wider@dep.state.fl.us.

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
850/921-9536

More than 3,000 retail pharmacies in Florida are now a part of the Florida Discount Drug Card program.
See www.FloridaDiscountDrugCard.com for more info or call toll-free, 1-866-341-8894

From: Koerner, Jeff
Sent: Thursday, February 21, 2008 10:55 AM
To: 'Grimaldi, Jill'
Cc: Barritt, Amber; Hibbard, Cynthia; russell.wilder@dep.state.fl.us; Sheplak, Scott
Subject: RE: Time Extension Request for Permit No. 0990234-008-AC

Jill,

Just a quick e-mail to remind you of the status of this request.

We have not yet received the application pages for this request as discussed with Disha Shah. We do not consider this an application yet. (I did not have Disha's e-mail address.)

Please submit these as soon as you can with the updated BACT review.

Scott Sheplak will be assigned to this project since he processed the original permit.

If you have any questions, please contact Scott or his new supervisor, Russell Wider.

Thanks!

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
850/921-9536

More than 3,000 retail pharmacies in Florida are now a part of the Florida Discount Drug Card program.
See www.FloridaDiscountDrugCard.com for more info or call toll-free, 1-866-341-8894

From: Grimaldi, Jill [<mailto:GrimaldiJT@cdm.com>]
Sent: Thursday, February 07, 2008 4:09 PM
To: Koerner, Jeff
Cc: Hibbard, Cynthia; Linero, Alvaro; Barritt, Amber; russell.wilder@dep.state.fl.us

2/21/2008

Subject: FW: Time Extension Request for Permit No. 0990234-008-AC

Jeff,

After I heard back from Russell, he suggested that you receive a copy of this as well. Sorry for the initial omission.

Jill Grimaldi

Jill Grimaldi

CDM

Project Manager

1701 State Road A1A, Suite 301

Vero Beach, Florida 32963

Main Tel: (772) 231-4301

Direct Tel: (772) 360-3224

Fax: (772) 231-4332

Cell: (772) 519-0660

From: Barritt, Amber

Sent: Thursday, February 07, 2008 4:04 PM

To: Alvaro.Linero@dep.state.fl.us

Cc: Mike.halpin@dep.state.fl.us; Cindy.Mulkey@dep.state.fl.us; Lee.Hoefert@dep.state.fl.us; russell.wilder@dep.state.fl.us; john_omalley@doh.state.fl.us; Ray Schauer; 'Patrick Carroll'; Marybeth Morrison; Leo, Kevin; Makled, Alex; Grimaldi, Jill; Hibbard, Cynthia; Shah, Disha

Subject: Time Extension Request for Permit No. 0990234-008-AC

Mr. Linero,

The air construction permit for the biosolids pelletization facility at the Solid Waste Authority of Palm Beach County's North County Resource Recovery Facility Site is set to expire on March 31st. The contractor is roughly nine months behind schedule, so the facility will not be completed and tested by the March 31st expiration date. Attached is a letter requesting a one-year time extension for that permit. A hard copy is being mailed to your attention as well.

Please feel free to contact me with any questions you may have on this time extension request. Thanks for your assistance on this matter.

<<letter_Air_Permit_020708.pdf>> <<Schedule.pdf>>

Best regards,

Amber M. Barritt, P.E.

CDM

1601 Belvedere Road, Suite 211 South

West Palm Beach, Florida 33406

Office: 561.689.3336

Cell: 561.685.6371

Fax: 561.689.9713

Email: barrittam@cdm.com

2/21/2008



1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
tel: 561 689-3336
fax: 561 689-9713

RECEIVED

MAR 03 2008

BUREAU OF AIR REGULATION

February 27, 2008

Mr. Alvaro Linero, P.E.
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility
Biosolids Pelletization Facility
Supplemental Documents for Time Extension Request for
Air Construction Permit (Permit No: 0990234-006-AC and PSD-FL-108F)

Dear Mr. Linero:

This letter is in reference to the Florida Department of Environmental Protection (FDEP) Air Construction Permit Number 0990234 and PSD-FL-108F for the construction of a Biosolids Pelletization Facility (BPF) at the North County Resource Recovery Facility site. On behalf of the Solid Waste Authority of Palm Beach County, CDM requested a one year extension of the Air Construction Permit for the BPF in a letter dated February 7, 2008. Transmitted herewith is the supplemental information that was requested by FDEP in response to the February 7, 2008, letter.

The first six pages of FDEP form 62-200.910(1), "Application Information," are included as **Attachment A**. The Contractor's construction schedule, provided as **Attachment B**, indicates that construction will be completed by December 1, 2008. No design or construction changes have occurred to date that would affect the air emissions calculations or the Best Available Control Technology (BACT) analysis previously submitted. An updated BACT analysis is provided as **Attachment C**.

Please feel free to call me at (561) 689-3336 with any questions you may have.

Very truly yours,

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



RECEIVED

MAR 03 2008

BUREAU OF AIR REGULATION

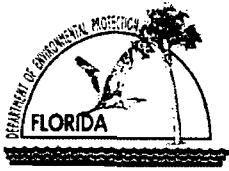
Mr. Alvaro Linero, P.E.
February 27, 2008
Page 2

Attachments

c: Jeff Koerner, FDEP, Bureau of Air Regulation
Scott Sheplak, FDEP, Bureau of Air Regulation
Mike Halpin, P.E., FDEP, Florida Energy Office
Cindy Mulkey, FDEP, Florida Energy Office
Russell Wider, FDEP, Bureau of Air Regulation
Lee Hoefert, FDEP, Southeast District
John O'Malley, PBC Health Department
Ray Schauer, SWA
Patrick Carroll, SWA
Mary Beth Morrison, SWA

File: 2678-46715-079

ATTACHMENT A



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

RECEIVED

MAR 03 2008

BUREAU OF AIR REGULATION

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Solid Waste Authority of Palm Beach County	
2. Site Name: North County Resource Recovery Facility	
3. Facility Identification Number: 0990234	
4. Facility Location... Solid Waste Authority of Palm Beach County, North County Resource Recovery Facility Street Address or Other Locator: 7501 North Jog Road City: West Palm Beach County: Palm Beach Zip Code: 33412-2414	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Amber M. Barritt, P.E., Project Manager	
2. Application Contact Mailing Address... Organization/Firm: Camp Dresser & McKee Street Address: 1601 Belvedere Road, Suite 211 S City: West Palm Beach State: FL Zip Code: 33406	
3. Application Contact Telephone Numbers... Telephone: (561) - 689-3336 ext. Fax: (561) - 689-9713	
4. Application Contact Email Address: barrittam@cdm.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is for one-year extension of the current air construction permit for the Biosolids Pelletization Facility

APPLICATION INFORMATION

Owner/Authorized Representative Statement

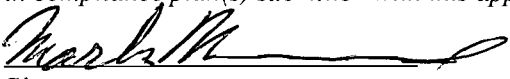
Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Mark Hammond, Executive Director
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412-2414
3. Owner/Authorized Representative Telephone Numbers... Telephone: (561) - 640-4000 Fax: (561) - 683-4067
4. Owner/Authorized Representative Email Address:
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature  Date

APPLICATION INFORMATION


Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:	Mark Hammond, Executive Director
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):	<input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address...	Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412
4. Application Responsible Official Telephone Numbers...	Telephone: 561 - 640-4000 Fax: 561 - 683-4067
5. Application Responsible Official Email Address:	
6. Application Responsible Official Certification:	<p><i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i></p> <p> Signature</p> <p><u>2/29/08</u> Date</p>

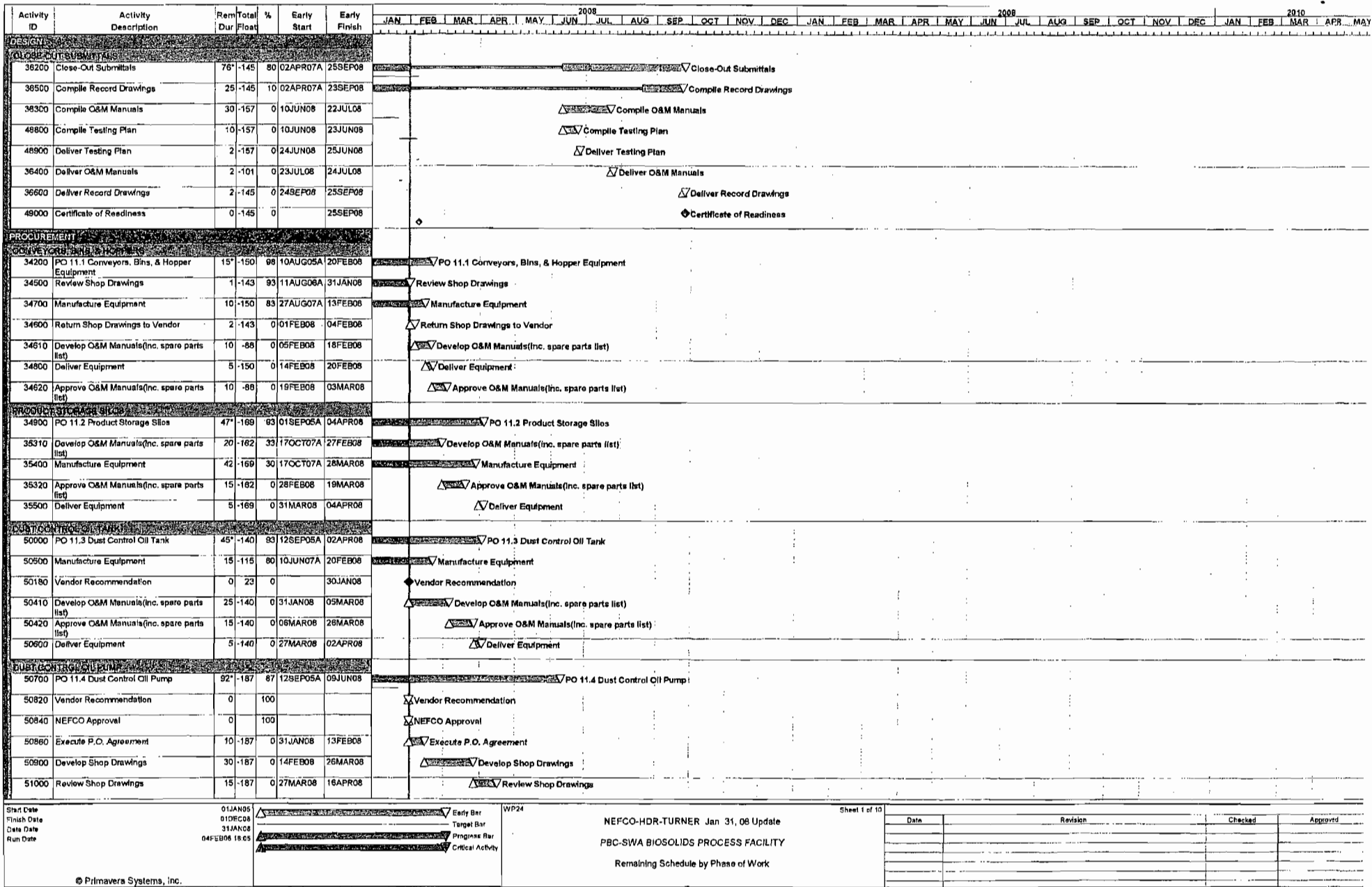
APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Amber M. Baritt, P.E. Registration Number: 66423
2. Professional Engineer Mailing Address... Organization/Firm: Camp Dresser & McKee Inc. Street Address: 1601 Belvedere Road, Suite 211 South City: West Palm Beach State: FL Zip Code: 33406
3. Professional Engineer Telephone Numbers... Telephone: 561 - 689-3336 Fax: 561 - 689-9713
4. Professional Engineer Email Address: barrittam@cdm.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> (1) <i>To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> (2) <i>To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> (3) <i>If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> (4) <i>If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> (5) <i>If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>2/27/08</u>

* Attach any exception to certification statement.

ATTACHMENT B



Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008												2009												2010					
							JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	
51100	Return Shop Drawings to vendor	2	-187	0	17APR08	18APR08	Return Shop Drawings to vendor																													
51110	Develop O&M Manuals(inc. spare parts list)	25	-134	0	21APR08	23MAY08	Develop O&M Manuals(inc. spare parts list)																													
51300	Manufacture Equipment	30	-187	0	21APR08	02JUN08	Manufacture Equipment																													
51120	Approve O&M Manuals(inc. spare parts list)	15	-134	0	26MAY08	16JUN08	Approve O&M Manuals(inc. spare parts list)																													
51400	Deliver Equipment	5	-187	0	03JUN08	08JUN08	Deliver Equipment																													
BIYER EQUIPMENT																																				
51800	Review Shop Drawings	2	21	97	07FEB08A	01FEB08	Review Shop Drawings																													
51900	Return Shop Drawings to vendor	2	-92	0	16NOV06A	01FEB08	Return Shop Drawings to vendor																													
52000	Manufacture Equipment	20	-189	73	22DEC06A	27FEB08	Manufacture Equipment																													
52180	Deliver Cyclones	5	-83	0	30NOV07A	08FEB08	Deliver Cyclones																													
52220	Deliver Cyclone-Fan SS Duct	5	-83	0	31JAN08	08FEB08	Deliver Cyclone-Fan SS Duct																													
52240	Deliver Drum-Cyclone Steel Duct	5	-83	0	31JAN08	08FEB08	Deliver Drum-Cyclone Steel Duct																													
51910	Develop O&M Manuals(inc. spare parts list)	10	-92	0	04FEB08	15FEB08	Develop O&M Manuals(inc. spare parts list)																													
51920	Approve O&M Manuals(inc. spare parts list)	15	-92	0	18FEB08	07MAR08	Approve O&M Manuals(inc. spare parts list)																													
52140	Deliver Burners	5	-189	0	28FEB08	05MAR08	Deliver Burners																													
52180	Deliver Induced Draft Fans	4	-187	0	28FEB08	04MAR08	Deliver Induced Draft Fans																													
52280	Deliver Control Panels	10	-156	0	28FEB08	12MAR08	Deliver Control Panels																													
REBURNER EQUIPMENT																																				
52820	Approve O&M Manuals(inc. spare parts list)	15	-90	0	31JAN08	20FEB08	Approve O&M Manuals(inc. spare parts list)																													
ADAPTER EQUIPMENT																																				
52800	PO 11.7 Crusher Equipment	13	-106	98	15AUG05A	18FEB08	PO 11.7 Crusher Equipment																													
53310	Develop O&M Manuals(inc. spare parts list)	10	-80	60	20AUG07A	13FEB08	Develop O&M Manuals(inc. spare parts list)																													
53400	Manufacture Equipment	8	-106	89	20AUG07A	11FEB08	Manufacture Equipment																													
53600	Deliver Equipment	5	-106	0	12FEB08	18FEB08	Deliver Equipment																													
53320	Approve O&M Manuals(inc. spare parts list)	15	-90	0	14FEB08	05MAR08	Approve O&M Manuals(inc. spare parts list)																													
NEURONICS SYSTEM																																				
53720	Vendor Recommendation	0	23	0		30JAN08	Vendor Recommendation																													
54010	Develop O&M Manuals(inc. spare parts list)	30	-110	0	31JAN08	12MAR08	Develop O&M Manuals(inc. spare parts list)																													
54020	Approve O&M Manuals(inc. spare parts list)	15	-110	0	13MAR08	02APR08	Approve O&M Manuals(inc. spare parts list)																													
REBURNER COOLING EQUIPMENT																																				
54720	Approve O&M Manuals(inc. spare parts list)	15	-90	0	04SEP07A	20FEB08	Approve O&M Manuals(inc. spare parts list)																													
SCRUBBER DUST CONTROL																																				
55410	Develop O&M Manuals(inc. spare parts list)	10	-90	60	08AUG07A	13FEB08	Develop O&M Manuals(inc. spare parts list)																													
55420	Approve O&M Manuals(inc. spare parts list)	15	-90	0	14FEB08	05MAR08	Approve O&M Manuals(inc. spare parts list)																													
COOLING SYSTEM																																				
55700	PO 11.11 Cooling Tower	11	-60	98	12SEP05A	14FEB08	PO 11.11 Cooling Tower																													
56200	Manufacture Equipment	6	-60	82	11DEC07A	07FEB08	Manufacture Equipment																													
55820	Vendor Recommendation	0	23	0		30JAN08	Vendor Recommendation																													
56110	Develop O&M Manuals(inc. spare parts list)	25	-105	0	31JAN08	05MAR08	Develop O&M Manuals(inc. spare parts list)																													

Start Date	01JAN08	Legend	WP24	Sheet 2 of 10	Date	Revision	Checked	Approved
Finish Date	01DEC08	Early Bar	NEFCO-HDR-TURNER Jan 31, 08 Update					
Data Date	31JAN08	Target Bar	PBC-SWA BIOSOLIDS PROCESS FACILITY					
Run Date	04FEB08 18:05	Progress Bar	Remaining Schedule by Phase of Work					
		Critical Activity						

Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008												2009												2010				
							JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY
56300	Deliver Equipment	5	-60	0	08FEB08	14FEB08	△ Deliver Equipment																												
56120	Approve O&M Manuals(inc. spare parts list)	15	-105	0	06MAR08	29MAR08	△ Approve O&M Manuals(inc. spare parts list)																												
COOLING TOWER PUMPS																																			
56400	PO 11.12 Cooling Tower Pumps	137	-176	81	19SEP05A	12AUG08	△ PO 11.12 Cooling Tower Pumps																												
56520	Vendor Recommendation	0	23	0		30JAN08	◆ Vendor Recommendation																												
56540	NEFCO Approval	5	-176	0	31JAN08	06FEB08	△ NEFCO Approval																												
56560	Execute P.O. Agreement	10	-176	0	07FEB08	20FEB08	△ Execute P.O. Agreement																												
56800	Develop Shop Drawings	30	-176	0	21FEB08	02APR08	△ Develop Shop Drawings																												
56700	Review Shop Drawings	15	-176	0	03APR08	23APR08	△ Review Shop Drawings																												
56800	Return Shop Drawings to Vendor	2	-176	0	24APR08	25APR08	△ Return Shop Drawings to Vendor																												
56810	Develop O&M Manuals(inc. spare parts list)	30	-144	0	28APR08	06JUN08	△ Develop O&M Manuals(inc. spare parts list)																												
56900	Manufacture Equipment	70	-176	0	28APR08	08AUG08	△ Manufacture Equipment																												
56820	Approve O&M Manuals(inc. spare parts list)	15	-144	0	10JUN08	30JUN08	△ Approve O&M Manuals(inc. spare parts list)																												
57000	Deliver Equipment	5	-176	0	08AUG08	12AUG08	△ Deliver Equipment																												
CONDENSER VENTURI PUMPS																																			
57100	PO 11.13 Condenser Venturi Pump	122	-147	83	12SEP05A	22JUL08	△ PO 11.13 Condenser Venturi Pump																												
57220	Vendor Recommendation	0	23	0		30JAN08	◆ Vendor Recommendation																												
57240	NEFCO Approval	5	-147	0	31JAN08	06FEB08	△ NEFCO Approval																												
57260	Execute P.O. Agreement	10	-147	0	07FEB08	20FEB08	△ Execute P.O. Agreement																												
57300	Develop Shop Drawings	30	-147	0	21FEB08	02APR08	△ Develop Shop Drawings																												
57400	Review Shop Drawings	15	-147	0	03APR08	23APR08	△ Review Shop Drawings																												
57500	Return Shop Drawings to Vendor	2	-147	0	24APR08	25APR08	△ Return Shop Drawings to Vendor																												
57510	Develop O&M Manuals(inc. spare parts list)	30	-142	0	28APR08	08JUN08	△ Develop O&M Manuals(inc. spare parts list)																												
57600	Manufacture Equipment	55	-147	0	28APR08	15JUL08	△ Manufacture Equipment																												
57520	Approve O&M Manuals(inc. spare parts list)	15	-142	0	10JUN08	30JUN08	△ Approve O&M Manuals(inc. spare parts list)																												
57700	Deliver Equipment	5	-147	0	16JUL08	22JUL08	△ Deliver Equipment																												
HEAT EXCHANGERS																																			
57800	PO 11.14 Heat Exchangers	97	-170	86	13SEP05A	16JUN08	△ PO 11.14 Heat Exchangers																												
57960	Execute P.O. Agreement	10	-170	0	16OCT06A	13FEB08	△ Execute P.O. Agreement																												
57920	Vendor Recommendation	0	23	0		30JAN08	◆ Vendor Recommendation																												
57940	NEFCO Approval	5	18	0	31JAN08	06FEB08	△ NEFCO Approval																												
58300	Manufacture Equipment	60	-138	20	31JAN08	23APR08	△ Manufacture Equipment																												
58000	Develop Shop Drawings	25	-170	0	14FEB08	16MAR08	△ Develop Shop Drawings																												
58100	Review Shop Drawings	15	-170	0	20MAR08	09APR08	△ Review Shop Drawings																												
58200	Return Shop Drawings to Vendor	2	-170	0	10APR08	11APR08	△ Return Shop Drawings to Vendor																												
58210	Develop O&M Manuals(inc. spare parts list)	25	-170	0	14APR08	16MAY08	△ Develop O&M Manuals(inc. spare parts list)																												
58220	Approve O&M Manuals(inc. spare parts list)	15	-170	0	19MAY08	09JUN08	△ Approve O&M Manuals(inc. spare parts list)																												

Start Date: 01JAN08
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△ Early Bar
 ▽ Target Bar
 ▽ Progress Bar
 ▽ Critical Activity

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NEFCO-HDR-TURNER Jan 31, 08 Update
 PBC-SWA BIOSOLIDS PROCESS FACILITY
 Remaining Schedule by Phase of Work

Date	Revision	Checked	Approved

Activity ID	Activity Description	Rem/Dur	Total Float	%	Early Start	Early Finish	2008												2009												2010			
							JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR
63110	Develop O&M Manuals(inc. spare parts list)	25	-132	0	10MAR08	11APR08	Develop O&M Manuals(inc. spare parts list)																											
63200	Manufacture Equipment	60	-188	0	10MAR08	02JUN08	Manufacture Equipment																											
63120	Approve O&M Manuals(inc. spare parts list)	15	-132	0	14APR08	02MAY08	Approve O&M Manuals(inc. spare parts list)																											
63300	Deliver Equipment	5	-188	0	03JUN08	09JUN08	Deliver Equipment																											
ELECTRICAL I&C																																		
63310	SC 01 Electrical I&C	65	-98	90	28NOV05A	30APR08	SC 01 Electrical I&C																											
63410	Develop I&C Shop Drawings	15	8	0	01MAY07A	20FEB08	Develop I&C Shop Drawings																											
63420	Review I&C Shop Drawings	15	-150	0	03DEC07A	20FEB08	Review I&C Shop Drawings																											
63380	Manufacture Equipment	60	-191	0	23JAN08A	23APR08	Manufacture Equipment																											
63400	Deliver Elect Appurt Shop Drawings	10	-158	0	31JAN08	13FEB08	Deliver Elect Appurt Shop Drawings																											
63430	Return I&C Shop Drawings	2	-150	0	21FEB08	22FEB08	Return I&C Shop Drawings																											
63440	Manufacture I&C Equipment	30	-85	0	25FEB08	04APR08	Manufacture I&C Equipment																											
63460	Develop O&M Manuals(inc. spare parts list)	1	-150	0	25FEB08	25FEB08	Develop O&M Manuals(inc. spare parts list)																											
63470	Approve O&M Manuals(inc. spare parts list)	1	-150	0	26FEB08	26FEB08	Approve O&M Manuals(inc. spare parts list)																											
63450	Deliver I&C Equipment	5	-85	0	07APR08	11APR08	Deliver I&C Equipment																											
63365	Deliver Equipment end MCC	5	-191	0	24APR08	30APR08	Deliver Equipment and MCC																											
CONSTRUCTION																																		
38110	Drainage Pipe	15	-117	0	18APR08	08MAY08	Drainage Pipe																											
38120	Sanitary Pipe	10	-117	0	07MAY08	20MAY08	Sanitary Pipe																											
38130	Final Grading	15	-117	0	21MAY08	11JUN08	Final Grading																											
37700	Final Sitework & Landscaping	46	-117	0	12JUN08	15AUG08	Final Sitework & Landscaping																											
37800	Fencing & Gates	15	-117	0	12JUN08	02JUL08	Fencing & Gates																											
37900	Roads & Paving	15	-117	0	03JUL08	24JUL08	Roads & Paving																											
38000	Sidewalks	5	-117	0	21JUL08	25JUL08	Sidewalks																											
38100	Landscaping	20	-117	0	21JUL08	15AUG08	Landscaping																											
CONCRETE																																		
38200	Foundations / Misc Concrete	10	-178	95	02MAY07A	13FEB08	Foundations / Misc Concrete																											
38400	Recv. Area Walls / Footings & Foundations Elev.	1	-179	83	02MAY07A	31JAN08	Recv. Area Walls / Footings & Foundations Elev.																											
38507	Storage Area Walls	32	-167	20	22FEB08A	14MAR08	Storage Area Walls																											
38821	Topping Mezzanine	3	-138	0	31JAN08	04FEB08	Topping Mezzanine																											
38900	Hollow Core	2	-178	0	12FEB08	13FEB08	Hollow Core																											
38600	Building Scrubber Foundation	15	-117	0	26MAR08	15APR08	Building Scrubber Foundation																											
38583	Roof Topping	10	-187	0	26MAR08	08APR08	Roof Topping																											
38620	Cooling Tower Foundation	8	-189	0	28MAR08	08APR08	Cooling Tower Foundation																											
38630	RTO Foundation	10	-189	0	01APR08	14APR08	RTO Foundation																											
38610	Chemical Storage Foundation	12	-189	0	03APR08	18APR08	Chemical Storage Foundation																											
38450	Pillet @ Storage Bins	20	-187	0	04APR08	01MAY08	Pillet @ Storage Bins																											

Start Date: 01JAN08
 Finish Date: 31DEC08
 Data Date: 31JAN08
 Run Date: 04FEB08 16:05

Legend:
 [Green Bar] Early Bar
 [Red Bar] Target Bar
 [Yellow Bar] Progress Bar
 [Black Bar] Critical Activity

W/P24
 NEFCO-HDR-TURNER Jan 31, 08 Update
 PBC-SWA BIOSOLIDS PROCESS FACILITY
 Remaining Schedule by Phase of Work

Sheet 5 of 10

Date	Revision	Checked	Approved

Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008												2009					2010				
							JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT
44700	Air Locks AL-102/202	2	-124	0	16JUN08	17JUN08	△ Air Locks AL-102/202																					
44900	Fan & Dust Control Oil Tank	2	-189	0	12JUN08	13JUN08	△ Fan & Dust Control Oil Tank																					
SCHEMATIC SUB-ELEMENTS																												
45000	Misc. Equipment	139	-184	0	31JAN08	14AUG08	△ Misc. Equipment																					
45400	Filter Presses FP-101/201	3	-102	0	05FEB08	07FEB08	△ Filter Presses FP-101/201																					
45500	Air Compressors	3	-86	0	05FEB08	07FEB08	△ Air Compressors																					
45100	Cooling Towers CT-301/302	10	-88	0	09APR08	22APR08	△ Cooling Towers CT-301/302																					
45800	Nitrogen Generator Unit	5	-79	0	09APR08	15APR08	△ Nitrogen Generator Unit																					
45720	Install Elevator	15	-56	0	30APR08	20MAY08	△ Install Elevator																					
45300	Polymer Blend Tank, Pump & Mixer	3	-188	0	10JUN08	12JUN08	△ Polymer Blend Tank, Pump & Mixer																					
45200	Cooling Tower Pumps P-301/302	2	-176	0	13AUG08	14AUG08	△ Cooling Tower Pumps P-301/302																					
MECHANICAL SYSTEMS																												
46300	Compressed Air System	12	-68	0	08FEB08	25FEB08	△ Compressed Air System																					
48400	Nitrogen System	4	-66	0	25FEB08	29FEB08	△ Nitrogen System																					
46500	Pellet Oil System	1	-66	0	03MAR08	03MAR08	△ Pellet Oil System																					
45900	Fiberglass Duckwork & Supports	12	-19	0	13MAR08	28MAR08	△ Fiberglass Duckwork & Supports																					
46100	Duct To/From Cyclone Separator	10	-192	0	14MAR08	27MAR08	△ Duct To/From Cyclone Separator																					
46600	Natural Gas System	8	-24	0	17MAR08	26MAR08	△ Natural Gas System																					
48710	Interconnect Piping IT/VS/FU	8	-113	0	17MAR08	26MAR08	△ Interconnect Piping IT/VS/FU																					
47300	SS Duct Scrubber to RTO	10	-131	0	28MAR08	10APR08	△ SS Duct Scrubber to RTO																					
47400	Mechanical Insulation	7	-182	0	28MAR08	07APR08	△ Mechanical Insulation																					
46010	Chemical Feed Systems	5	-104	0	21APR08	25APR08	△ Chemical Feed Systems																					
46200	Plumbing Fixtures/Trim	7	-140	0	16JUN08	24JUN08	△ Plumbing Fixtures/Trim																					
46800	Potable & Industrial Water System	15	-151	0	19JUN08	10JUL08	△ Potable & Industrial Water System																					
46900	Cooling Water System	6	-178	0	15AUG08	22AUG08	△ Cooling Water System																					
47000	Wet Pipe Sprinkler System	10	-157	0	25AUG08	06SEP08	△ Wet Pipe Sprinkler System																					
46700	Landfill Gas System	7	-139	0	08SEP08	17SEP08	△ Landfill Gas System																					
47100	Dry Fire Protection System	10	-157	0	08SEP08	22SEP08	△ Dry Fire Protection System																					
47200	HVAC System	15	-157	0	23SEP08	13OCT08	△ HVAC System																					
ELECTRICAL INSTRUMENTATION WORK																												
47680	Deliver Transformer #1 (FPL)	20	-96	83	15NOV07A	27FEB08	△ Deliver Transformer #1 (FPL)																					
45700	Standby Generator	5	-81	0	31JAN08	06FEB08	△ Standby Generator																					
47620	Install U.G. Conduits ROW to Bldg	10	-91	0	31JAN08	13FEB08	△ Install U.G. Conduits ROW to Bldg																					
47670	Deliver Transformer #2 (FPL)	120	-112	0	31JAN08	18JUL08	△ Deliver Transformer #2 (FPL)																					
46110	Offsite Electrical (FPL)	20	-98	0	31JAN08	27FEB08	△ Offsite Electrical (FPL)																					
47640	Transformer Pads	5	-91	0	14FEB08	20FEB08	△ Transformer Pads																					
47610	Install Transformer #1/Pull Feeders (FPL)	15	-96	0	28FEB08	19MAR08	△ Install Transformer #1/Pull Feeders (FPL)																					

Start Date 01JAN08
 Finish Date 01DEC08
 Date Date 31JAN08
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Early Bar
 Target Bar
 Progress Bar
 Critical Activity

WP24
 NEFCO-HOR-TURNER Jan 31, 08 Update
 PBC-SWA BIOSOLIDS PROCESS FACILITY
 Remaining Schedule by Phase of Work

Date	Revision	Checked	Approved

Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008												2009												2010					
							JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	
47630	Energize Transformer #1 (FPL)	0	-12	0	02APR08	19MAR08	◆ Energize Transformer #1 (FPL)																													
47700	Elect Cond/Cable Tray Train 1	60	-192	0	02APR08	25JUN08	▲ Elect Cond/Cable Tray Train 1																													
47710	Elect Cond/Cable Tray Train 2	60	-192	0	02APR08	25JUN08	▲ Elect Cond/Cable Tray Train 2																													
47800	Electrical MCCs & Equipment	5	-191	0	01MAY08	07MAY08	▲ Electrical MCCs & Equipment																													
47900	Pull & Terminate Elect Train 1	60	-191	0	08MAY08	01AUG08	▲ Pull & Terminate Elect Train 1																													
47910	Pull & Terminate Elect Train 2	60	-183	0	08MAY08	01AUG08	▲ Pull & Terminate Elect Train 2																													
47720	Inst Cond/Cable Tray Train 1	45	-192	0	26JUN08	28AUG08	▲ Inst Cond/Cable Tray Train 1																													
47730	Inst Cond/Cable Tray Train 2	45	-192	0	26JUN08	28AUG08	▲ Inst Cond/Cable Tray Train 2																													
47920	Pull & Terminate Inst Train 1	45	-192	0	11JUL08	12SEP08	▲ Pull & Terminate Inst Train 1																													
47930	Pull & Terminate Inst Train 2	45	-192	0	11JUL08	12SEP08	▲ Pull & Terminate Inst Train 2																													
47680	Install Transformer #2/Pull Feeders (FPL)	15	-112	0	21JUL08	08AUG08	▲ Install Transformer #2/Pull Feeders (FPL)																													
48000	Energize Pre-Power	10	-181	0	04AUG08	15AUG08	▲ Energize Pre-Power																													
48100	Loop Check Instructions	10	-185	0	04AUG08	15AUG08	▲ Loop Check Instructions																													
47690	Energize Transformer #2 (FPL)	0	-121	0	21AUG08	21AUG08	◆ Energize Transformer #2 (FPL)																													
47650	Permanent Power	2	-191	0	22AUG08	25AUG08	▲ Permanent Power																													
47800	Instrumentation	10	-192	0	15SEP08	26SEP08	▲ Instrumentation																													
START UP & TESTING																																				
48780	Standby Generator Functional Test	5	-140	0	22MAY08	28MAY08	▲ Standby Generator Functional Test																													
48715	Screening/Crusher/Separator Eq Functional Test	5	-191	0	26AUG08	01SEP08	▲ Screening/Crusher/Separator Eq Functional Test																													
48775	Air Compressor Equip. Functional Test	1	-180	0	28AUG08	28AUG08	▲ Air Compressor Equip. Functional Test																													
48735	Pneumatic Syst. Equip. Functional Test	1	-190	0	27AUG08	27AUG08	▲ Pneumatic Syst. Equip. Functional Test																													
48710	Dryer Equip. Functional Test	5	-190	0	01SEP08	08SEP08	▲ Dryer Equip. Functional Test																													
48760	RTO Equip. Functional Test	2	-175	0	01SEP08	02SEP08	▲ RTO Equip. Functional Test																													
48720	Conveyance Equip. Functional Test	5	-181	0	05SEP08	11SEP08	▲ Conveyance Equip. Functional Test																													
48725	Product Storage Silos Functional Test	2	-179	0	05SEP08	08SEP08	▲ Product Storage Silos Functional Test																													
48727	Land Fill Gas Operational (By Others)	0	-178	0		08SEP08	◆ Land Fill Gas Operational (By Others)																													
48740	Pellet Cooler Equip. Functional Test	1	-179	0	09SEP08	09SEP08	▲ Pellet Cooler Equip. Functional Test																													
48730	Scrubber/Dust Control Equip. Functional Test	2	-190	0	11SEP08	12SEP08	▲ Scrubber/Dust Control Equip. Functional Test																													
48745	Cooling Tower & Pump Functional Test	3	-191	0	16SEP08	18SEP08	▲ Cooling Tower & Pump Functional Test																													
48755	Bldg Scrubber Equip. Functional Test	3	-188	0	16SEP08	18SEP08	▲ Bldg Scrubber Equip. Functional Test																													
48765	Chemical Feed Pumps Functional Test	2	-181	0	23SEP08	24SEP08	▲ Chemical Feed Pumps Functional Test																													
48770	N2O2 Equip. Functional Test	2	-180	0	23SEP08	24SEP08	▲ N2O2 Equip. Functional Test																													
48785	Polymer Feed Syst. Functional Test	2	-190	0	23SEP08	24SEP08	▲ Polymer Feed Syst. Functional Test																													
48750	Venturi Pump Equip. Functional Test	1	-191	0	25SEP08	25SEP08	▲ Venturi Pump Equip. Functional Test																													
48500	Final City Inspections	11	-181	0	18AUG08	18AUG08	▲ Final City Inspections																													

Start Date 01JAN05
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Early Bar
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 Progress Bar
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WP24

NEFCO-HDR-TURNER Jan 31, 08 Update
 PBC-SWA BIOSOLIDS PROCESS FACILITY
 Remaining Schedule by Phase of Work

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Date	Revision	Checked	Approved

ATTACHMENT C



Memorandum

*To: Disha Shah and Cynthia Hibbard
CDM*

*From: Frank Sapienza
CDM*

Date: February 23, 2008

Subject: Update of BACT Analysis

*Project: Air Permit Application for Biosolids Pelletization Facility for
Solid Waste Authority of Palm Beach County, FL*

The purpose of this memorandum is to update the Best Available Control Technology (BACT) analysis submitted for the Biosolids Pelletization Facility (BPF) for the Solid Waste Authority of Palm Beach County (SWA), Florida.

Review of BACT Applicability and Methodology

The BACT analysis evaluates control technologies for nitrous oxides (NO_x) and particulate matter (PM) for the 135 dtpd (675 wtpd) BPF. The BPF contains two trains (i.e. two biosolids dryers and associated APC systems.) The total maximum potential NO_x emission rate from the two BPF trains will be approximately 49 tons per year, which is greater than the Prevention of Significant Deterioration (PSD) significant net emissions increase level for a Major Modification (i.e. 40 tons per year). In addition, the total maximum potential PM emission rate will be approximately 21 tons per year; this exceeds the PSD significant net emissions increase level (15 tons per year of PM₁₀). (Rule 62-212.400(2)(e)2., F.A.C.) Therefore, since the project's NO_x and PM emissions constitute PSD significant net increases for these two pollutants, the new facility is classified as a Major Modification and a BACT analysis is required for the two pollutants that exceed the PSD significance level. All other maximum potential air pollutant emission rates for the BPF will be below the PSD significant net emissions increase levels.

A BACT analysis is an evaluation of the "best available" air pollution control technology for a particular emission source and for particular pollutants (in this case PM and NO_x). The evaluation must consider the environmental, economic and energy impacts of each control technology. Furthermore, the analysis must be "top-down," that is, it must start with the most

stringent control alternative and work down to the least effective control alternative. The most effective control technology which is determined to be technically and economically feasible is BACT.

Update of BACT Analysis

The US EPA RACT/BACT/LEAR Clearinghouse database was searched again to determine if any new BACT determinations had been recorded for municipal biosolids drying plants in the USA. The only municipal biosolids dryer facility listed in the database was this project, the BPF for the SWA. In addition, based on CDM's contacts with dryer manufacturers, no new dryer facilities with more advanced air pollution control systems have been proposed or have come on line within the last year.

NO_x Control Technology Review

The NO_x control technologies evaluated in the BACT were:

1. Low Temperature Selective Catalytic Reduction
2. Low Temperature Ozone Oxidation
3. Multi-Chemical Wet Scrubbing System
4. Low NO_x Burner and Acid Addition

The first three NO_x control technologies listed have not been applied to a municipal biosolids dryer facility as of this submittal date. The technical and economic evaluations presented in the BACT analysis are still valid with the exception that the costs to implement these technologies have most likely increased slightly due to inflation. Since the application of these technologies to a biosolids dryer facility has not changed and their associated capital and operations and maintenance costs have not significantly changed, then the cost per ton of NO_x removed has essentially remained the same or slightly increased. Each of these three technologies had very high costs per ton of NO_x removed, ranging from \$17,700/ton to \$29,900/ton, and were judged to be economically infeasible. The present day costs for these technologies would be essentially the same, if not slightly higher, and therefore these technologies are still judged to be economically infeasible.

The fourth control technology, Low NO_x Burner and Acid Addition, would accomplish 50 percent control of NO_x and would still have a low cost per ton of NO_x removed of approximately \$2,900/ton. Since the Low NO_x Burner and Acid Addition alternative is both technically and economically feasible, it is still BACT for the BPF.

PM Control Technology Review

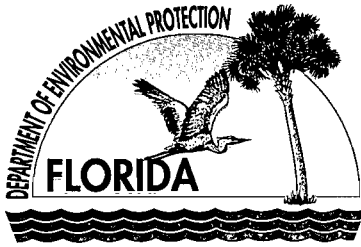
The base case for PM control is an impingement tray scrubber/condenser with dryer exhaust recirculation which will achieve 97 percent control of PM and an emission rate of 2.42 lb of PM/hr-dryer. The following PM control technologies were evaluated in the BACT:

1. Fabric Filter
2. Dry Electrostatic Precipitator (Dry ESP)
3. Wet Electrostatic Precipitator (Wet ESP)

The technical and economic evaluation of these control technologies has not changed significantly since the initial BACT submittal. The use of a fabric filter on a biosolids dryer would still be technically risky due to the potential for blinding of the filter medium. In addition the unit removal cost of this alternative would still be very high at approximately \$26,700/ton.

The use of a Dry ESP is still judged to be technically risky due to the likelihood of condensation, corrosion and fouling inside the ESP. The unit cost of \$31,600/ton has not changed significantly since the BACT was submitted, and therefore it is still judged to be economically infeasible.

The Wet ESP is technically feasible and could be applied to a biosolids dryer. The unit cost of adding a Wet ESP is still very high at approximately \$29,400/ton and hence it is still judged to be economically infeasible. Since all of the proposed PM control technologies are still economically infeasible, BACT for PM control is the base case which consists of an impingement tray scrubber which serves as a condenser and particulate scrubber. The impingement tray scrubber will control PM emissions to 10.6 tons per year for each train, a total of 21.2 tons of PM per year for both trains.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 28, 2008

Electronic Mail – Received Receipt Requested

mmhammond@swa.org

Mr. Mark Hammond
Executive Director
Solid Waste Authority of Palm Beach County
7501 North Jog Road
West Palm Beach, Florida 33412

Re: Incompleteness Letter, File Number 0990234-011-AC
Extension of Permit Number 0990234-006-AC/PSD-FL-108F

Dear Mr. Hammond:

On March 3, 2008, the Department received an air construction (AC) permit application to extend the subject AC/prevention of significant deterioration (PSD) permit. The reason indicated to us for the extension is contractor delays. A one year extension of the March 31, 2008 expiration date was requested.

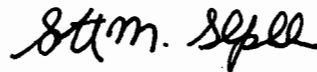
After review, it has been determined that the application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

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.
 - a. 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.”}
2. Thank you for providing the updated best available control technology (BACT) analysis with the submittal. BACT had been proposed by the applicant in the application filed on May 4, 2005. The final BACT for this project was issued on February 2, 2006.
 - a. Is this a “phased construction project” under 40 CFR 52.21(j)(4)?

The Department will resume processing the application after receipt of the requested information. Rule 62-4.050(3), F.A.C. requires that all applications for a Department construction permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative. You are reminded that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days or provide a written request for an additional period of time to submit the information.

If you should have any questions, please contact me by telephone at 850/921-9532 or by e-mail at Scott.Sheplak@dep.state.fl.us.

Sincerely,



Scott M. Sheplak, P.E.
DEP - Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, FL 32399

copy to:

Ms. Amber M. Barritt, P.E., CDM, via e-mail barrittam@cdm.com

Mr. Lee Hoefert, P.E., DEP Southeast District Office, via e-mail Lee.Hoefert@dep.state.fl.us

Mr. James Stormer, PBCHD, via e-mail James.Stormer@doh.state.fl.us

Mr. Mike Halpin, P.E., DEP Siting Coordination Office, via e-mail Mike.Halpin@dep.state.fl.us

Harvey, Mary

From: Barritt, Amber [BarrittAM@cdm.com]
Sent: Wednesday, April 02, 2008 9:22 AM
To: Sheplak, Scott
Cc: mmhammond@swa.org; Hoefert, Lee; Mr. James Stormer, PBCHD, via e-mail; Halpin, Mike; Walker, Elizabeth (AIR); Gibson, Victoria; Harvey, Mary; Patrick Carroll; Hibbard, Cynthia; Grimaldi, Jill; Pawlyk, Ronald; Shah, Disha; Leo, Kevin
Subject: RE: Incompleteness Letter, File Number 0990234-011-AC
Attachments: WPBPR07273.pdf

Mr. Sheplak-

Attached is a response letter CDM has prepared on behalf of SWA regarding the incompleteness letter. Please feel free to contact me with any additional questions you may have. A hard copy is being mailed to your attention.

Best regards,

Amber M. Barritt, P.E.

CDM

1601 Belvedere Road, Suite 211 South

West Palm Beach, Florida 33406

Phone: 561.689.3336

Fax: 561.689.9713

Email: barrittam@cdm.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
Sent: Friday, March 28, 2008 3:48 PM
To: mmhammond@swa.org; Barritt, Amber; Hoefert, Lee; Mr. James Stormer, PBCHD, via e-mail; Halpin, Mike
Cc: Sheplak, Scott; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re: Incompleteness Letter, File Number 0990234-011-AC

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:
<http://www.adobe.com/products/acrobat/readstep.html>.

4/2/2008

Harvey, Mary

From: Sheplak, Scott
To: Harvey, Mary
Sent: Friday, March 28, 2008 4:28 PM
Subject: Read: Incompleteness Letter, File Number 0990234-011-AC

Your message

To: 'mmhammond@swa.org'; 'Ms. Amber M. Barritt, P.E., CDM, via e-mail'; Hoefert, Lee; 'Mr. James Stormer, PBCHD, via e-mail'; Halpin, Mike
Cc: Sheplak, Scott; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re: Incompleteness Letter, File Number 0990234-011-AC
Sent: 3/28/2008 3:48 PM

was read on 3/28/2008 4:28 PM.

Harvey, Mary

From: Barritt, Amber [BarrittAM@cdm.com]
Sent: Monday, March 31, 2008 1:31 PM
To: Harvey, Mary
Subject: RE: Incompleteness Letter, File Number 0990234-011-AC

Thanks you for the letter. This serves as a proof of receipt for the email correspondence. We will be responding shortly.

Best regards,

Amber M. Barritt, P.E.
CDM
1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
Phone: 561.689.3336
Fax: 561.689.9713
Email: barrittam@cdm.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]
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To: mmhammond@swa.org; Barritt, Amber; Hoefert, Lee; Mr. James Stormer, PBCHD, via e-mail; Halpin, Mike
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Thank you,

3/31/2008

Harvey, Mary

From: Halpin, Mike
To: Harvey, Mary
Sent: Friday, March 28, 2008 3:49 PM
Subject: Read: Incompleteness Letter, File Number 0990234-011-AC

Your message

To: 'mmhammond@swa.org'; 'Ms. Amber M. Barritt, P.E., CDM, via e-mail'; Hoefert, Lee; 'Mr. James Stormer, PBCHD, via e-mail'; Halpin, Mike
Cc: Sheplak, Scott; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re: Incompleteness Letter, File Number 0990234-011-AC
Sent: 3/28/2008 3:48 PM

was read on 3/28/2008 3:49 PM.

Harvey, Mary

From: James_Stormer@doh.state.fl.us
To: Harvey, Mary
Sent: Friday, March 28, 2008 3:55 PM
Subject: Read: Re: Incompleteness Letter, File Number 0990234-011-AC

Your message

To: James_Stormer@doh.state.fl.us
Subject:

was read on 3/28/2008 3:55 PM.

Harvey, Mary

From: Hoefert, Lee
To: Harvey, Mary
Sent: Friday, March 28, 2008 3:54 PM
Subject: Read: Incompleteness Letter, File Number 0990234-011-AC

Your message

To: 'mmhammond@swa.org'; 'Ms. Amber M. Barritt, P.E., CDM, via e-mail'; Hoefert, Lee; 'Mr. James Stormer, PBCHD, via e-mail'; Halpin, Mike
Cc: Sheplak, Scott; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re: Incompleteness Letter, File Number 0990234-011-AC
Sent: 3/28/2008 3:48 PM

was read on 3/28/2008 3:54 PM.

Harvey, Mary

From: Harvey, Mary
Sent: Friday, March 28, 2008 3:48 PM
To: 'mmhammond@swa.org'; 'Ms. Amber M. Barritt, P.E., CDM, via e-mail'; Hoefert, Lee; 'Mr. James Stormer, PBCHD, via e-mail'; Halpin, Mike
Cc: Sheplak, Scott; Walker, Elizabeth (AIR); Gibson, Victoria
Subject: Re: Incompleteness Letter, File Number 0990234-011-AC
Attachments: Document.pdf

Tracking:	Recipient	Delivery	Read
	'mmhammond@swa.org'		
	'Ms. Amber M. Barritt, P.E., CDM, via e-mail'		
	Hoefert, Lee	Delivered: 3/28/2008 3:48 PM	Read: 3/28/2008 3:54 PM
	'Mr. James Stormer, PBCHD, via e-mail'		
	Halpin, Mike	Delivered: 3/28/2008 3:48 PM	Read: 3/28/2008 3:49 PM
	Sheplak, Scott	Delivered: 3/28/2008 3:48 PM	Read: 3/28/2008 4:28 PM
	Walker, Elizabeth (AIR)	Delivered: 3/28/2008 3:48 PM	
	Gibson, Victoria	Delivered: 3/28/2008 3:48 PM	Read: 3/31/2008 8:05 AM

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Thank you,

DEP, Bureau of Air Regulation

Sheplak, Scott

- 46 -

From: Barritt, Amber [BarrittAM@cdm.com]
Sent: Wednesday, April 02, 2008 9:22 AM
To: Sheplak, Scott
Cc: mmhammond@swa.org; Hoefert, Lee; Mr. James Stormer, PBCHD, via e-mail; Halpin, Mike; Walker, Elizabeth (AIR); Gibson, Victoria; Harvey, Mary; Patrick Carroll; Hibbard, Cynthia; Grimaldi, Jill; Pawlyk, Ronald; Shah, Disha; Leo, Kevin
Subject: RE: Incompleteness Letter, File Number 0990234-011-AC
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Mr. Sheplak-

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Best regards,

Amber M. Barritt, P.E.

CDM

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West Palm Beach, Florida 33406

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Subject: Re: Incompleteness Letter, File Number 0990234-011-AC

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4/17/2008



1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
tel: 561 689-3336
fax: 561 689-9713

RECEIVED

APR 07 2008

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.



Mr. Scott Sheplak, P.E.
April 1, 2008
Page 2

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.

c: Mark Hammond, SWA, via email mhammond@swa.org
 Lee Hoefert, P.E., FDEP Southeast District Office, via email Lee.Hoefert@dep.state.fl.us
 James Stormer, PBCHD, via email James_Stormer@doh.state.fl.us
 Mike Halpin, P.E., FDEP Siting Coordination Office, via email Mike.Halpin@dep.state.fl.us

File: 2678-46715-079



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

April 28, 2008

Sent by Electronic Mail – Received Receipt Requested

Mr. Mark Hammond
Executive Director
Solid Waste Authority of Palm Beach County
7501 North Jog Road
West Palm Beach, Florida 33412

Re: Extension of Expiration Date for an Air Construction Permit
Solid Waste Authority of Palm Beach County
Biosolids Pelletization Facility
Project No. 0990234-011-AC
Palm Beach County
Extension of Permit No. 0990234-006-AC/PSD-FL-108F

Dear Mr. Hammond:

On March 3, 2008, the Department received a request to extend Permit No. 0990234-006-AC/PSD-FL-108F. Permit No. 0990234-006-AC/PSD-FL-108F had been issued on February 2, 2006. The reason cited for the extension request was contractor delays. A one year extension of the March 31, 2008 expiration date was requested.

The request to extend the AC permit was timely. In a letter dated April 1, 2008, the applicant indicated construction commenced on December 22, 2006. Construction of the subject project commenced within eighteen (18) months of the approval to construct under 40 CFR 52.21(r)(2). The subject project is not a phased project requiring a re-evaluation of best available control technology (BACT) under 40 CFR 52.21(j)(4). A re-evaluation of BACT as part of the permit extension request is therefore not required.

Based on the circumstances and information provided, the Department approves this request.

Determination: The expiration date is hereby extended from **March 31, 2008**, to **March 31, 2009**. This extension must be attached to and becomes a part of Permit No. 0990234-006-AC/PSD-FL-108F. A copy of this letter shall be maintained at the site of the proposed activity. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241 / Facsimile: 850/245-2303). Petitions must be filed within 14 days of receipt of this permit extension. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (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; the 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 the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the 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.

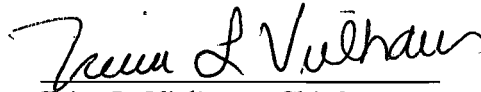
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such 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: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/raw/sms

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this permit extension was sent by electronic mail with received receipt requested before the close of business on 4/28/08 to the persons listed below.

Mr. Mark Hammond, Executive Director, SWA, mmhammond@swa.org

Ms. Amber M. Barritt, P.E., CDM, barrittam@cdm.com

Mr. Lee Hoefert, P.E., DEP Southeast District Office, Lee.Hoefert@dep.state.fl.us

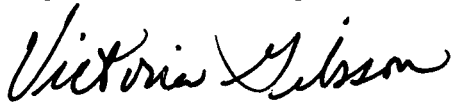
Mr. James Stormer, PBCHD, James_Stormer@doh.state.fl.us

Mr. Mike Halpin, P.E., DEP Siting Coordination Office, Mike.Halpin@dep.state.fl.us

Mr. Gregg Worley, EPA, worley.gregg@epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

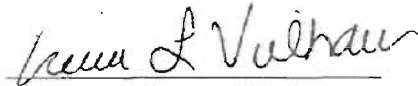
4/28/08
(Date)

Tracking Page

Solid Waste Authority of Palm Beach County
Biosolids Pelletization Facility

Project No. 0990234-011-AC
Extension of Permit No. 0990234-006-AC/PSD-FL-108F

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

TLV/raw/sms

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Mr. James Stormer, PBCHD, James.Stormer@doh.state.fl.us

Mr. Mike Halpin, P.E., DEP Siting Coordination Office, Mike.Halpin@dep.state.fl.us

Mr. Gregg Worley, EPA, worley.gregg@epa.gov

Clerk Stamp

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(Clerk)

4/28/08
(Date)

Walker, Elizabeth (AIR)

From: Walker, Elizabeth (AIR)
Sent: Monday, April 28, 2008 3:19 PM
To: 'mmhamond@swa.org'; 'barritam@cdm.com'
Cc: Hoefert, Lee; 'James_Stormer@doh.state.fl.us'; Halpin, Mike; 'worley.gregg@epa.gov'; Sheplak, Scott; Harvey, Mary
Subject: Solid Waste Authority of Palm Beach - 0990234-011-AC
Attachments: 0990234-011-AC.pdf

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Thank you,

DEP, Bureau of Air Regulation

Tracking:

Recipient
'mmhamond@swa.org' *Recent*
'barrittam@cdm.com'
Hoefert, Lee
'James_Stormer@doh.state.fl.us'
Halpin, Mike
✓ 'worley.gregg@epa.gov'
Sheplak, Scott
Harvey, Mary

Delivery

Delivered: 4/28/2008 3:19 PM

Delivered: 4/28/2008 3:19 PM

Delivered: 4/28/2008 3:19 PM

Delivered: 4/28/2008 3:19 PM

Walker, Elizabeth (AIR)

From: Barritt, Amber [BarrittAM@cdm.com]
To: Walker, Elizabeth (AIR)
Sent: Monday, April 28, 2008 4:35 PM
Subject: Read: Solid Waste Authority of Palm Beach - 0990234-011-AC

Your message

To: BarrittAM@cdm.com
Subject:

was read on 4/28/2008 4:35 PM.

Walker, Elizabeth (AIR)

From: Hoefert, Lee
To: Walker, Elizabeth (AIR)
Sent: Monday, April 28, 2008 4:23 PM
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Your message

To: 'mmhamond@swa.org'; 'barrittam@cdm.com'
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Subject: Solid Waste Authority of Palm Beach - 0990234-011-AC
Sent: 4/28/2008 3:19 PM

was read on 4/28/2008 4:23 PM.

Walker, Elizabeth (AIR)

From: Worley.Gregg@epamail.epa.gov
Sent: Monday, April 28, 2008 3:28 PM
To: Walker, Elizabeth (AIR)
Subject: Re: Solid Waste Authority of Palm Beach - 0990234-011-AC

Gregg M. Worley
Chief, Air Permits Section
U.S. EPA Region 4
(404) 562-9141
fax (404) 562-9019

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Walker, Elizabeth (AIR)

From: Exchange Administrator
Sent: Monday, April 28, 2008 3:19 PM
To: Walker, Elizabeth (AIR)
Subject: Delivery Status Notification (Relay)
Attachments: ATT814536.txt; Solid Waste Authority of Palm Beach - 0990234-011-AC

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

barritam@cdm.com

Harvey, Mary

From: Halpin, Mike
To: Harvey, Mary
Sent: Wednesday, May 07, 2008 3:59 PM
Subject: Read: FW: Solid Waste Authority of Palm Beach - 0990234-011-AC

Your message

To: 'mmhammond@swa.org'; 'james.stormer@doh.state.fl.us'; Halpin, Mike
Subject: FW: Solid Waste Authority of Palm Beach - 0990234-011-AC
Sent: 5/7/2008 3:41 PM

was read on 5/7/2008 3:59 PM.

