

Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

Certified Mail -- Return Receipt Requested

September 12, 2005

Mr. Christopher M. Carey
Regional Vice President
Wheelabrator South Broward, Inc.
4400 South State Road 7
Ft. Lauderdale, Florida 33314

Re: DRAFT Title V Air Operation Permit Renewal No. 0112119-009-AV
South Broward Waste-to-Energy Facility

Dear Mr. Carey:

Thank you for your response to our request for additional information letter received on August 18, 2005. However, we must deem your application still *incomplete*, because we need further information relative to the following items:

- Compliance Assurance Monitoring (CAM) exemption justification data. In Table A-1 of your letter you note that the control devices for the pollutant mercury (Hg) are exempt from CAM. For reference, we have listed below specific condition of your current Title V permit that addresses this pollutant limitation. As noted in this condition, the specified limits are based on *both* NSPS (40 CFR 60, Subpart Cb) and PSD applicable requirements.
- You state that a CAM Plan is not required for this pollutant because it is subject to a post-1990 NSPS emission limit (40 CFR, Subpart Cb). However if there is a BACT or SIP standard for a pollutant that is more stringent than the one addressed by the NSPS or NESHAP, CAM may still apply to the emissions unit for that standard. Based on this finding, please provide the additional analysis required, and submit the necessary CAM plan if warranted.
- As part of the analysis to determine if a CAM plan is required for emissions units using add-on control devices to meet an emissions limitation, you need to calculate the pre-control potential emissions (PTE) of the pollutants with SIP-based limitations to assess if the pre-control_PTE values exceed the Title V thresholds for CAM applicability.
- When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526.

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Mr. Christopher M. Carey
Wheelabrator South Broward, Inc.

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- Rule 62-4.050(3), F.A.C. requires that all applications for a Department 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. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Selected Specific Condition of current Title V permit No. 0112119-008-AV:

Mercury

B.28. The emission limit for mercury contained in the gases discharged to the atmosphere is 0.070 milligrams per dry standard cubic meter or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent.

[40 CFR 60.33b(a)(3) and Rule 62-296.416(3)(b)1.b., F.A.C.; and, PSD-FL-105(B)]

Sincerely,



A. A. Linero, P.E.
Program Administrator
Permitting South Section

Cc: Darrel Graziani, Southeast District Office
Kennard F. Kosky, Golder Associates, Inc.

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<p>1. Article Addressed to:</p> <p>Mr. Christopher M. Carey Regional Vice President Wheelabrator South Broward, Inc. 4400 South State Road 7 Ft. Lauderdale, Florida 33314</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
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Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
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Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

Certified Mail -- Return Receipt Requested

May 9, 2005

Mr. Christopher M. Carey
Regional Vice President
Wheelabrator South Broward, Inc.
4400 South State Road 7
Ft. Lauderdale, Florida 33314

Re: DRAFT Title V Air Operation Permit Renewal No. **0112119-009-AV**
South Broward Waste-to-Energy Facility


Dear Mr. Carey:

We have begun the review of your Title V permit renewal application received on April 25, 2005. However, we must deem your application *incomplete*, because we need further information relative to the following items:

- Compliance Assurance Monitoring (CAM) exemption justification data. In the Additional Requirements for Title V Air Operation Permit Application section of the application for the three municipal waste combustors and auxiliary burners, you checked the box "Not Applicable". For reference, we have listed below specific conditions of your current Title V permit that address pollutant limitations. As noted in these conditions, in many cases the specified limits are based on *both* NSPS (40 CFR 60, Subpart Cb) and PSD applicable requirements.
- We assume that your argument is that CAM Plans are not required for a number of pollutants subject to post-1990 NSPS emission limit (40 CFR, Subpart Cb). *However if there is a BACT or SIP standard for a pollutant that is different (either more stringent or less stringent) from the one addressed by the NSPS or NESHAP, CAM may still apply to the emissions unit for that standard.* Based on this finding, please provide the additional analysis required, and submit the necessary CAM plans if warranted. The analysis should address each of the pollutants limited by specific conditions in the current Title V air operation permit.
- As part of the analysis to determine if CAM plans are required for emissions units using add-on control devices to meet an emissions limitation, you need to calculate the pre-control potential emissions (PTE) of all the pollutants with SIP-based limitations to assess if the pre-control_PTE values exceed the Title V thresholds for CAM applicability.

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 Please indicate if there are *control devices in place* to limit emissions of each of the pollutants addressed by the Title V permit's specific conditions.

- The requested changes to your current Title V Air Operation Permit concerning beryllium emission limits and testing and fluoride testing (Attachment WSB-FI-CV6) (see also page 16 of the Lime Silo Section, and page 14 of the Ash Handling System Section) would require an air construction (AC) permit to implement.
- When we receive this information, we will continue processing your application. If you have any questions, please contact Tom Cascio at 850-921-9526.
- Rule 62-4.050(3), F.A.C. requires that all applications for a Department 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. Permit applicants are advised that Rule 62-213.420(1)(b), F.A.C., requires applicants to respond to requests for information within 90 days, unless the applicant has requested in writing, and has been granted, additional time within 90 days.

Selected Specific Conditions of current Title V permit No. 0112119-008-AV:

Particulate Matter

B.25. The emission limit for particulate matter contained in the gases discharged to the atmosphere is 27 milligrams per dry standard cubic meter, corrected to 7 percent oxygen. [40 CFR 60.33b(a)(1)(i) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for particulate matter.

Cadmium

B.27. The emission limit for cadmium contained in the gases discharged to the atmosphere is 0.040 milligrams per dry standard cubic meter, corrected to 7 percent oxygen. [40 CFR 60.33b(a)(2)(i) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for cadmium.

Mercury

B.28. The emission limit for mercury contained in the gases discharged to the atmosphere is 0.070 milligrams per dry standard cubic meter or 15 percent of the potential mercury emission concentration (85-percent reduction by weight), corrected to 7 percent oxygen, whichever is less stringent. [40 CFR 60.33b(a)(3) and Rule 62-296.416(3)(b)1.b., F.A.C.; and, PSD-FL-105(B)]

Lead

B.30. The emission limit for lead contained in the gases discharged to the atmosphere is 0.44 milligrams per dry standard cubic meter, corrected to 7 percent oxygen.
[40 CFR 60.33b(a)(4) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for lead.

Sulfur Dioxide

B.31. The emission limit for sulfur dioxide contained in the gases discharged to the atmosphere is 29 parts per million by volume or 25 percent of the potential sulfur dioxide emission concentration (75-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent. Compliance with this emission limit is based on a 24-hour daily geometric mean.
[40 CFR 60.33b(b)(3)(i) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for sulfur dioxide.

B.32. Not federally enforceable. Sulfur Content. The sulfur content of the distillate fuel oil or natural gas for the auxiliary burner shall not exceed 0.3%, by weight.
[PA-85-21]

Hydrogen Chloride

B.33. The emission limit for hydrogen chloride contained in the gases discharged to the atmosphere is 29 parts per million by volume or 5 percent of the potential hydrogen chloride emission concentration (95-percent reduction by weight or volume), corrected to 7 percent oxygen (dry basis), whichever is less stringent.
[40 CFR 60.33b(b)(3)(ii) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for hydrogen chloride.

Dioxins/Furans

B.34. The emission limit for dioxins/furans contained in the gases discharged to the atmosphere that do not employ an electrostatic precipitator-based emission control system is 30 nanograms per dry standard cubic meter (total mass of tetra- through octa chlorinated dibenzo-p-dioxins and dibenzofurans), corrected to 7 percent oxygen.
[40 CFR 60.33b(c)(1)(ii) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for dioxins/furans.

Mr. Christopher M. Carey
Wheelabrator South Broward, Inc.

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Nitrogen Oxides

B.35. The emission limit for nitrogen oxides contained in the gases discharged to the atmosphere is 205 parts per million by volume, corrected to 7 percent oxygen, dry basis. The permittee may request authorization from the Department to conduct nitrogen oxides emissions averaging pursuant to 40 CFR 60.33b.
[40 CFR 60.33b(d) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for nitrogen oxides.

Carbon Monoxide

B.36. The emission limit for carbon monoxide contained in the gases discharged to the atmosphere is 100 parts per million by volume, measured at the combustor outlet in conjunction with a measurement of oxygen concentration, corrected to 7 percent oxygen, dry basis. Calculated as an arithmetic average. Averaging time is a 4-hour block average.
[40 CFR 60.34b(a) and PSD-FL-105(B)]

Note: It appears from the records that PSD-FL-105(B) implements the NSPS standard for carbon monoxide.

Beryllium

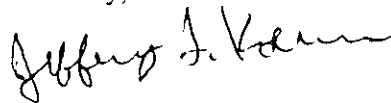
B.38. Stack emissions of beryllium from each unit shall not exceed 0.001 mg/dscm, corrected to 7% O₂.
[PSD-FL-105(B)]

Total Fluorides

B.39. Stack emissions of total fluorides from each unit shall not exceed 0.0040 lb/MMBtu.
[PSD-FL-105(B)]

C.4. Particulate Matter Emissions. Particulate matter emissions from the lime silo baghouse shall not exceed 0.010 gr./dscf, nor 0.021 tons/year.
[AC06-187000 & AC06-187001]

Sincerely,



A. A. Linero, P.E.
Program Administrator
Permitting South Section

Mr. Christopher M. Carey
Wheelabrator South Broward, Inc.

Page 5 of 5

Cc: Darrel Graziani, Southeast District Office
Kennard F. Kosky, Golder Associates, Inc.

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