

Golder Associates Inc.

6241 NW 23rd Street, Suite 500
Gainesville, FL 32653-1500
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April 9, 1999

9837542Y/F1/WP/RTC

Mr. A. A. Linero, P.E., Administrator
New Source Review Section
Bureau of Air Regulation
Florida Department of Environmental Protection
111 South Magnolia Drive, Suite 4
Tallahassee, FL 32301

RECEIVED

APR 12 1999

BUREAU OF
AIR REGULATION

Attention: Teresa Heron

RE: South and North Broward County Resource Recovery Facilities - Subpart Cb
Wheelabrator South Broward, Inc. and Wheelabrator North Broward, Inc.

Dear Teresa:

As we discussed and as identified in the Department's February 26, 1999 letter, I am providing additional information pertaining to the applications submitted to the Department that addresses the New Source Performance Standards (NSPS) Subpart Cb including certain permit simplifications. The information you requested is provided below.

1. Pursuant to Rules 62-4.070(3), 62-210.200 and 62-212.400(2)(a)2. F.A.C., please provide reasonable assurance that the burning of the proposed wastes and the operation of the boilers at the proposed conditions will not be construed as a modification (no emissions increases). Include all assumptions, reference materials and calculations (i.e., test data, comparison of actual emissions vs. representative actual emissions in TPY).

As defined in Rule 62-210.200(188), a "modification" is "any physical change in, or change in the method of operation of, or addition to a facility which would result in an increase in actual emissions of any air pollutant subject to regulation under the Act." The only proposed physical change or change in the method of operation of the boilers will be the addition of Selective Non-Catalytic Reduction (SNCR) systems to meet the nitrogen oxides emission limits of Subpart Cb. This system is being installed to lower NOx emissions. The addition of SNCR, while a physical addition to the facility, will not result in any changes in actual emissions of any other regulated air pollutant. The requested definition of fuels will only more specifically describe what the type of fuels can be used. The revised definition contains fuels that are commonly mixed in the normal household and commercial waste streams and will not change the emission characteristics of the units. None of the other proposed amendments to the existing PSD conditions, e.g., adjusting allowable emissions to the Subpart Cb requirements, will result in an increase in actual emissions. Accordingly, Prevention of Significant Deterioration (PSD) review is not applicable.

Attached as Tables 1 and 2 are changes in allowable emissions as a result of the request. These tables are based on the application forms (Section H. Emission Unit Pollutant Detail Information) and Table 4-2 in the applications. For PM/PM10, SO₂, NO_x, Lead and Mercury there are considerable decreases in allowable emissions. For CO there is no increase in actual emissions, since the streamlining of the current CO emission limits into the Subpart Cb limit does not change the combustion efficiency of the boilers. However, there is an apparent increase in the annual allowable emissions.

The apparent increase in CO allowable emissions is an artifact of eliminating the existing CO limits of 0.09 lb/mmBtu or 88 ppm at 12 percent CO₂ (4-day rolling average) and 400 ppm at 12 percent CO₂ (1-hour rolling average). The Subpart Cb limit is 100 ppm at 7 percent O₂ (4-hour block average) and is more stringent overall than the previously combined limits and compliance methods. Using the previous lowest CO emission limit of 0.09 lb/mmBtu, which is the basis for the existing PSD annual limit the maximum increase in the allowable emission rate would be about 60 tons/year for each facility. This is less than the PSD significant emission rate. The deletion of the other CO emission limits would bring the PSD and PPSA in conformance with the Subpart Cb requirements.

2. What is the net steam energy (difference between the enthalpy of the steam and feedwater)? Please see attached correspondence from CDM for reference.

We have reviewed the material transmitted with the February 26, 1999 letter concerning the Hillsborough County's request for increased steam flow and the use of net enthalpy for determination of boiler heat input. For the South and North Broward applications, there is no request to change the heat input (i.e., mmBtu/hr), fuel input (i.e., tons/day) or production rate (i.e., lb/hr steam) limitations. The steam limits in the approvals are 192,000 and 186,000 lb/hr for the South Broward and North Broward facilities, respectively. EPA in the development of the Eb/Cb standards determined that steam flow was the best practical and most accurate method for determining combustor load levels. Therefore, the incorporation of an additional limit would not be warranted. To date, the facilities have effectively used the steam production limitations (i.e., in lb/hr) to demonstrate compliance with the production limits and should be allowed to continue without additional limitations.

3. Consolidation of the emission limits between the PSD permit and the PPSC conditions of certification.

The deletion of the emission limits for these pollutants is requested for several reasons. This includes permit simplification, compliance with other pollutants as surrogates and change in FDEP PSD rules.

First, the PSD and PPSA conditions in several instances do not include the emissions limits of these pollutants (see attached summary). For the South Broward facility, the PSD permit includes emission limits for fluorides but does not include emission limits for VOCs, As, and SAM; the PPSA approval includes emission limits for VOCs, fluorides, and SAM with no limit for As. For the North Broward facility, the PSD permit includes emission limits for

fluorides but does not include limits for VOCs, As and SAM as emission limits; the PPSA approval includes emission limits for VOCs, fluorides, As, and SAM.

Second, the PSD permit was issued after the PPSA and would have accounted for those pollutants that both EPA and Department determined to be appropriate for the facilities. Eliminating VOCs, As, and SAM from the PPSA conditions would make the approvals consistent. Second, the emission limits for SO₂ and HCL will provide the Department reasonable assurance that other acid gases such as SAM and F are low. The emission limit for CO also assures that the emissions of VOCs are low. Indeed, the last compliance tests (1998) for these pollutants found the actual emissions from 5 to 100 times lower than the emission limits. In several cases the actual emissions were less than the detection limits.

Finally, the Department's change in Table 212.400-2 of Chapter 62-212 does not include As. Moreover, the Subpart Cb emission limits for PM and cadmium and lead were intended by EPA to represent emission limits for the category of all Municipal Waste Combustor metals. Meeting these limits would ensure that emission of other metals would be minimized. The elimination of the emission limits for As, SAM, F and VOCs will result in permit conditions that are consistent across the two approvals (PSD and PPSA) and with Subpart Cb requirements.

In the review of the application, there were a few errors in the North Broward application concerning emissions (SO₂ and HCL) that I noticed and have provided corrections for. These do not substantially change the application. Your prompt review of the application is appreciated. If there are any further questions please call.

Sincerely,

GOLDER ASSOCIATES INC.



Kennard F. Kosky, P.E.
Principal
Professional Engineer No. 14996

SEAL

KFK/arz



cc: Mark Santella, Wheelabrator
Rick Mulhorn, Wheelabrator

C:\DATA\DFP\PROJECTS\98\9837542Y\F1 south\WP\RTC-ltr.doc

cc: B. Owen, PPS

SED

EPA

Broward Co.

S. Smallwood, ERM South

File

Golder Associates

Table 2. Allowable Emissions for North Broward Resource Recovery Facility (per boiler)

Pollutants	Current Allowable		New Allowable		Net Difference ton/yr	PSD Significant Level ton/yr
	lb/hr	ton/yr	lb/hr	ton/yr		
PM/PM10	9.5	41.6	7.35	32.2	-9.4	25/15
SO ₂	66.3	290.0	32.8	143.5	-146.5	40 ^a
NO _x	169.3	741.5	106.5	466.4	-275.1	40
CO	27.2	119.2	31.8	139.1	19.9	100
Beryllium	2.81E-04	1.20E-03	2.81E-04	1.20E-03	0	15 ^b
Lead	0.45	1.98	0.133	0.58	-1.4	0.6 ^b
Mercury	0.23	0.96	0.019	0.08	-0.9	0.1
HCL	None	None	11.71	51.3	0	40 ^a
Dioxins	None	None	8.20E-06	3.60E-05	0	3.50E-06
Cadmium	None	None	0.011	0.048	0	15 ^b

Footnotes:

- a: MSC Acid Gases - includes SO₂ and HCL.
- b: MSC Metals (as PM); lead also a MSC metal.

**Consolidation Summary of PSD and PPSA Approvals-
VOCs, Fluorides, Arsenic and SAM¹**

South Broward

<u>Pollutant</u>	<u>PSD (PSD-FL-105)</u>	<u>PPSA (PA 85-21)</u>
Volatile Organic Compounds	No	Yes
Fluorides	Yes	Yes
Arsenic (As)	No	No
Sulfuric Acid Mist (SAM)	No	Yes

North Broward

<u>Pollutant</u>	<u>PSD (PSD-FL-112)</u>	<u>PPSA (PA 86-22)</u>
Volatile Organic Compounds	No	Yes
Fluorides	Yes	Yes
Arsenic (As)	No	Yes
Sulfuric Acid Mist (SAM)	No	Yes

¹ Emission limits for these pollutants are requested to be eliminated from both the PPSA approval and the PSD approval, as applicable.

Table 1. Allowable Emissions for South Broward Resource Recovery Facility (per boiler)

Pollutants	Current Allowable		New Allowable		Net Difference ton/yr	PSD Significant Level ton/yr
	lb/hr	ton/yr	lb/hr	ton/yr		
PM/PM10	10.1	44.5	7.85	34.4	-10.1	25/15
SO ₂	70.9	310.6	35.1	153.7	-156.9	40 ^a
NO _x	181.2	793.3	114	499	-294.3	40
CO	29.1	127.6	33.9	148.5	20.9	100
Beryllium	3.01E-04	1.32E-03	3.01E-04	1.32E-03	0	15 ^b
Lead	0.48	2.11	0.142	0.62	-1.5	0.6 ^b
Mercury	0.24	1.08	0.02	0.09	-1.0	0.1
HCL	None	None	12.55	55	0	40 ^a
Dioxins	None	None	8.70E-06	3.80E-05	0	3.50E-06
Cadmium	None	None	0.012	0.051	0	15 ^b

Footnotes:

- a: MSC Acid Gases - includes SO₂ and HCL.
- b: MSC Metals (as PM); lead also a MSC metal.

4. Professional Engineer's Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) 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

(2) 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.

If the purpose of this application is to obtain a Title V source air operation permit (check here [] 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 schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X] 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.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [] 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.

Signature _____ Date 4/9/99
(seal) 7/3

* Attach any exception to certification statement.

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: SO2	
2. Total Percent Efficiency of Control:	75 %
3. Potential Emissions:	32.8 lb/hour 143.5 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr	
6. Emission Factor: 29 ppmvd @ 7% O2 Reference: 40 CFR 60 Subpart Cb	
7. Emissions Method Code: <input checked="" type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
8. Calculation of Emissions (limit to 600 characters): 32.6 tons/hr x 3.9 lb/ton x (1-0.75) = 32.8 lb/hr; 3.9 lb/ton = uncontrolled SO2 from Table 2.1.8 AP-42	
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Emission limit is the less stringent requirement of 75% removal or 29 ppmvd @ 7% O2.	

Emissions Unit Information Section 1 of 3
Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: RULE		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units: 29 ppmvd @ 7% O2		
4. Equivalent Allowable Emissions:	32.8 lb/hour	143.5 tons/year
5. Method of Compliance (limit to 60 characters): Stack Test Method 6C		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): 40 CFR 60 Subpart Cb specifies the less stringent requirement of 75% removal or 29 ppmvd @ 7% O2.		

B.

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: H106		
2. Total Percent Efficiency of Control:		95 %
3. Potential Emissions:	11.71 lb/hour	51.3 tons/year
4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr		
6. Emission Factor:		29 ppmvd @ 7% O2
Reference: 40 CFR 60 Subpart Cb		
7. Emissions Method Code: <input checked="" type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		
8. Calculation of Emissions (limit to 600 characters): 33.6 tons/hr x 6.97 lb/ton x (1-0.95) = 11.71 lb/hr; 6.97 lb/ton = uncontrolled HCL from Table 2.1.8 AP-42		
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Emission limit is the less stringent requirement of 95% removal or 29 ppmvd @ 7% O2.		

Emissions Unit Information Section 1 of 3
Allowable Emissions (Pollutant identified on front page)

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2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units: 29 ppmvd @ 7% O2		
4. Equivalent Allowable Emissions:	11.71 lb/hour	51.3 tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): 40 CFR 60 Subpart Cb, less stringent requirement of 95% control efficiency or 29 ppmvd @ 7% O2.		

B.

1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characters):		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		

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9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Emission limit is the less stringent requirement of 75% removal or 29 ppmvd @ 7% O2.	

Emissions Unit Information Section 2 of 3
Allowable Emissions (Pollutant identified on front page)

A.

1. Basis for Allowable Emissions Code: RULE		
2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units: 29 ppmvd @ 7% O2		
4. Equivalent Allowable Emissions:	32.8 lb/hour	143.5 tons/year
5. Method of Compliance (limit to 60 characters): Stack Test Method 6C		
6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters): 40 CFR 60 Subpart Cb specifies the less stringent requirement of 75% removal or 29 ppmvd @ 7% O2.		

B.

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2. Future Effective Date of Allowable Emissions:		
3. Requested Allowable Emissions and Units:		
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**H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units Only - Emissions Limited Pollutants Only)**

Pollutant Detail Information:

1. Pollutant Emitted: H106	
2. Total Percent Efficiency of Control:	95 %
3. Potential Emissions:	11.71 lb/hour 51.3 tons/year
4. Synthetically Limited?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
5. Range of Estimated Fugitive/Other Emissions: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 _____ to _____ tons/yr	
6. Emission Factor:	29 ppmvd @ 7% O2 Reference: 40 CFR 60 Subpart Cb
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6. Pollutant Allowable Emissions Comment (Desc. of Related Operating Method/Mode) (limit to 200 characters):		



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

February 26, 1999

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

Mr. Kennard Kosky
Golder Associates Inc.
6241 NW 23rd Street Suite 500
Gainesville, FL 32653-1500

Subject: DEP Files No.: PSD-FL-112(B)/PA 86-22 Request for Permit Modification

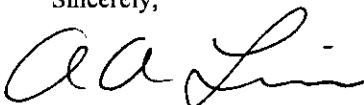
Dear Mr. Kosky:

This letter is to confirm the telephone conversations and the e-mail correspondence between you and Ms. Teresa Heron of my staff. We are in the process of finalizing the proposed permit amendment, however we need the data verbally requested to complete it. Basically the information needed is repeated as follows:

1. Pursuant to Rules 62-4.070 (3), 62-210.200 and 62-212.400(2)(a)2. F.A.C., please provide reasonable assurance that the burning of the proposed wastes and the operation of the boilers at the proposed conditions will not be construed as a modification (no emissions increases). Include all assumptions, reference materials and calculations (i.e., test data, comparison of actual emissions vs. representative actual emissions in TPY).
2. What is the net steam energy (difference between the enthalpy of the steam & feedwater)? Please see attached correspondence from CDM for reference.
3. Consolidation of the emission limits between the PSD permit and the PPSC conditions of certification.

If you have any questions regarding this matter, please call Teresa Heron (Review Engineer) at (850) 921-9529 or write to me at the above address.

Sincerely,

 2/26
for A. A. Linero, F.E. Administrator
New Source Review Section

AAL/th/t

cc: Buck Oven, DEP PPSC
Thomas D. Kirk, WNB

Is your RETURN ADDRESS completed on the reverse

- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

Additional services (for an extra fee):

1. Addressee's Address

2. Restricted Delivery

Consult postmaster for fee.

<p>3. Article Addressed to:</p> <p><i>Mr. Howard Kosky</i> <i>Holder Associates</i> <i>6241 NW 23rd St</i> <i>Gainesville, FL</i></p> <p style="text-align: right; margin-right: 20px;"><i>32653-1500</i></p>	<p>4a. Article Number <i>P 265 659 428</i></p> <p>4b. Service Type</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified</p> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Insured</p> <p><input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD</p> <p>7. Date of Delivery <i>3-3-99</i></p>
<p>5. Received By: (Print Name)</p>	<p>8. Addressee's Address (Only if requested and fee is paid)</p>
<p>6. Signature: (Addressee or Agent)</p> <p><i>X M. Belmont</i></p>	

PS Form 3811, December 1994 102595-97-B-0179 Domestic Return Receipt

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P 265 659 428

US Postal Service
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<p><i>Howard Kosky</i></p>	
<p>Street & Number <i>Holder Assoc</i></p>	
<p>Post Office, State, & ZIP Code <i>Gainesville FL</i></p>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>3-1-99</i>
<p><i>PSD-F1-112(0)</i> <i>PA 86-22</i></p>	

PS Form 3800, April 1995

FACSIMILE TRANSMISSION

GOLDER ASSOCIATES INC.

6241 NW 23RD STREET
GAINESVILLE, FLORIDA 32653 USA

TELEPHONE NO. (352) 336-5600
FAX NO. (352) 336-6603

Date: January 21, 1999 Project No.: 1480
FAX No.: (850)922-6979
TO: Teresa Heron
ORGANIZATION: FDEP-Bureau of Air Regulation
FR: Kennard F. Kosky, P.E.
RE: MODIFICATION REQUEST-FINAL CONDITIONS
Hard Copy to Follow: Yes No Total Number of Pages
(including this cover page): 4

MESSAGE:

Dear Teresa: Attached please find the final EPA approval for the North Broward Resource Recovery Facility which changes the heat input rate. Condition c. 1. shows the increase in the heat input to 302.5 mmBtu/hr from the previous version. I will forward that to you via mail the complete PSD package. Please call if you have any questions.

Regards, Ken

cc: Rick Mulhorn, Wheelabrator; via US mail w/o enclosures

RECEIVED
JAN 22 1999
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AIR REGULATION

FORMS/FAX



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

FEB 9 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas M. Henderson
Project Director
Broward County Resource
Recovery Office
115 South Andrews Avenue, Room 521
Ft. Lauderdale, Florida 33301

Re: North Broward Resource Recovery Facility (PSD-FL-112)

Dear Mr. Henderson:

Pursuant to the February 5, 1989, request from Ms. Kerri L. Barsh, Attorney, Greenberg, Traurig, Hoffman, Lipoff, Rosen & Quentel, P.A., this is to confirm that the U.S. Environmental Protection Agency (EPA) has determined that the modifications to the federally issued Prevention of Significant Deterioration (PSD) permit (PSD-FL-112) proposed at the North Broward Resource Recovery Facility (RRF) will meet all applicable requirements of 40 CFR §52.21. Specifically, the federally issued PSD permit No. PSD-FL-112 will be modified to reflect the construction of three (3) municipal waste incinerators rather than four (4) as previously planned. All other conditions and limitations specified in the original PSD permit issued on July 28, 1987, will remain in force and effect.

Accordingly, PART I, Specific Conditions, item c.(1) will now be revised to read as follows:


- c. (1) None of the three individual municipal solid waste incinerators shall be charged in excess of 302.5 mmBtu/hr and 806.6 tons per day MSW (108% rated capacity) nor produce in excess of 186,000 lbs/hr of steam (3-hr rolling average).

In addition to the above change, the original construction authorization signed by Lee A. DeHihns, III, Deputy Regional Administrator, will be modified to authorize this change. Enclosed with this letter, please find the modified page to permit PSD-FL-112 authorizing the construction of the three municipal waste combustors.

Please be advised that the modifications to your PSD permit herein described shall become a binding part of permit PSD-FL-112. This permit modification shall become effective upon receipt of this letter unless you notify us of your objection to the conditions contained herein within ten (10) days after receipt of this letter.

If you have any questions concerning this matter, please contact Mr. Wayne Aronson of my staff at (404) 347-2864.

Sincerely yours,


Greer C. Tidwell
Regional Administrator

Enclosure

cc: C. H. Fancy, Deputy Chief
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE
PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 U.S.C. §7470 et. seq., and the regulations promulgated thereunder at 40 CFR §52.21, as amended at 50 Fed. Reg. 28550 (July 12, 1985),

North Broward County Resource Recovery Facility

is, as of the effective date of this permit (PSD-FL-112) authorized to construct a resource recovery facility consisting of three 806.6 ton per day (maximum capacity) mass burn, municipal solid waste incinerators and appurtenances at the following location:

2700 Hilton Road (N.W. 48th Street)
Pompano Beach, Florida 33060
Unincorporated Broward County, Florida.

Upon completion of authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Part I. - Specific Conditions and Part II. - General Conditions.

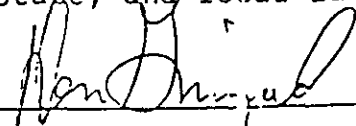
This permit is hereby issued on JUL 23 1987 and shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1).

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

This authorization to construct shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and local law.

FEB 09 1989.

Date Signed


Regional Administrator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUL 28 1987

APT-APB/eaw

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Thomas M. Henderson
Project Director
Broward County Resource Recovery Office
115 South Andrews Avenue, Room 521
Ft. Lauderdale, Florida 33301

Re: North Broward Resource Recovery Facility (PSD-FL-112)

Dear Mr. Henderson:

Review of your February 14, 1986, application to construct a four unit, 226.9 mmBTU/hr (each) heat input, mass burn, municipal solid waste fired, energy recovery facility in Broward County, Florida, has been completed. The construction is subject to rules for the Prevention of Significant Deterioration (PSD) of air quality contained in 40 CFR §52.21. The Florida Department of Environmental Regulation (FDER) performed the preliminary determination concerning the proposed construction and published a request for public comment on September 13, 1986. Eleven public comments were received and addressed in the final determination. On June 26, 1987, the Environmental Protection Agency (EPA) prepared a final determination recommending issuance of the PSD permit by EPA.

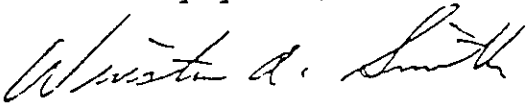
EPA has determined that the construction as described in the application meets all the applicable requirements of 40 CFR §52.21. Accordingly, pursuant to 40 CFR §124.15, the Regional Administrator has made a final decision to issue the enclosed Permit to Construct: Part I. - Specific Conditions and Part II. - General Conditions. This authority to construct, granted as of the effective date of the permit, is based solely on the requirements of 40 CFR §52.21, air quality. It does not apply to other permits issued by this Agency or by other agencies. Please be advised that a violation of any permit condition, as well as any construction which proceeds in material variance with information contained in the final determination, will be subject to enforcement action.

This final permit decision is subject to appeal under 40 CFR §124.19 by petitioning the Administrator of the EPA within thirty (30) days after receipt thereof. The petitioner must submit a statement of reasons for the appeal and the Administrator must decide on the petition within a reasonable time period. If the petition is denied, the permit shall become effective upon notice of such action to the parties to the appeal. If no appeal is

filed with the Administrator, the permit shall become effective thirty (30) days after receipt of this letter. Upon the expiration of the thirty (30) day period, EPA will notify you of the status of the permit's effective date.

Receipt of this letter does not constitute authority to construct. Approval to construct this four unit, mass burn, municipal solid waste fired, energy recovery facility shall be granted as of the effective date of the permit. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Mr. Bruce Miller, Chief, Air Programs Branch at (404) 347-2864.

Sincerely yours,



Winston A. Smith, Director
Air, Pesticides, and Toxics
Management Division

Enclosure

cc: Mr. Steve Smallwood, P.E., Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation

PERMIT TO CONSTRUCT UNDER THE RULES FOR THE
PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY

Pursuant to and in accordance with the provisions of Part C, Subpart 1 of the Clean Air Act, as amended, 42 U.S.C. §7470 et. seq., and the regulations promulgated thereunder at 40 CFR §52.21, as amended at 50 Fed. Reg. 28550 (July 12, 1985),

North Broward County Resource Recovery Facility

is, as of the effective date of this permit (PSD-FL-112) authorized to construct a resource recovery facility consisting of four 605 ton per day (maximum capacity) mass burn, municipal solid waste incinerators and appurtenances at the following location:

2700 Hilton Road (N.W. 48th Street)
Pompano Beach, Florida 33060
Unincorporated Broward County, Florida.

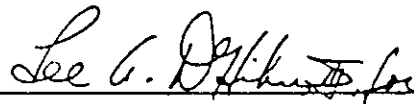
Upon completion of authorized construction and commencement of operation/production, this stationary source shall be operated in accordance with the emission limitations, sampling requirements, monitoring requirements and other conditions set forth in the attached Part I. - Specific Conditions and Part II. - General Conditions.

This permit is hereby issued on JUL 28 1987 and shall become effective thirty (30) days after receipt hereof unless a petition for administrative review is filed with the Administrator during that time. If a petition is filed any applicable effective date shall be determined in accordance with 40 CFR §124.19(f)(1).

If construction does not commence within 18 months after the effective date of this permit, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time, this permit shall expire and authorization to construct shall become invalid.

This authorization to construct shall not relieve the owner or operator of the responsibility to comply fully with all applicable provisions of Federal, State, and local law.

July 28, 1987
Date Signed



Lee A. DeHihns, III, Deputy
Regional Administrator

PART I. - Specific Conditions

1. Emission Limitations

a. Stack emissions from each unit shall not exceed the following:

- Particulate: 0.0150 gr/dscf dry volume corrected to 12% CO₂.
- Sulfur Dioxide: (1) 0.140 lb/mmBtu heat input and 60 ppm (3-hr rolling average, dry volume, corrected to 12% CO₂); or
- (2) 65% reduction of uncontrolled SO₂ emissions.*
In no case shall the SO₂ emissions exceed 0.310 lb/mmBtu heat input and 124 ppm (3-hr rolling average, dry volume, corrected to 12% CO₂).

The 124 ppm limit above shall be modified to reflect a new emission limit (in ppm) from the control device at 65% control efficiency. ~~Within 18 months of start-up of operation, the County shall submit compliance tests that~~ will be used to determine the new SO₂ emission limit (in ppm). The limit will be determined by observed average emission rate (u) from the submitted compliance tests and will be statistically analyzed using the one tailed student T test ($t_{.05} = (\bar{x} - u) n^{0.5}/s$) at the 95% confidence level to derive a mean emission rate (\bar{x}), where s is the standard deviation of observed values n. The final operating SO₂ emission limit (in ppm) shall be this mean emission rate (\bar{x}). This value shall be restricted to no more than 124 ppm or less than 60 ppm (3-hr rolling average, dry volume, corrected to 12% CO₂).

Nitrogen Oxides: .560 lb/mmBtu heat input and 350 ppm (3-hr rolling average, dry volume, corrected to 12% CO₂).

Carbon Monoxide: .090 lb/mmBtu heat input; 400 ppm (1-hr rolling average, dry volume, corrected to 12% CO₂); and 88 ppm (4-day rolling average, dry volume, corrected to 12% CO₂).

Lead: .00056 lb/mmBtu

Fluorides: .0040 lb/mmBtu

Beryllium: 9.30 x 10⁻⁷ lb/mmBtu

Mercury: 7.50 x 10⁻⁴ lb/mmBtu

* Uncontrolled SO₂ emissions will be measured at the inlet to the acid gas control device.

Visible Emissions: Opacity of stack emissions shall not be greater than 15% opacity. Excess opacity resulting from startup or shut-down shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess opacity shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by EPA for longer duration.

The units are subject to 40 CFR Part 60, Subpart E and Subpart Db, New Source Performance Standards (NSPS), except that where requirements in this permit are more restrictive, the requirements in this permit shall apply.

There shall be no greater than 10% opacity for emissions from the refuse bunker and the ash handling and loadout. The potential for dust generation by ash handling activities will be mitigated by quenching the ash prior to loading in ash transport trucks. Additionally, all portions of the proposed facility, including the ash handling facility, which have the potential for fugitive emissions will be enclosed. Also, those areas which have to be open for operational purposes, (e.g., tipping floor of the refuse bunker while trucks are entering and leaving) will be under negative air pressure.

b. Only distillate fuel oil or natural gas shall be used in startup burners. The annual capacity factor for use of natural gas and oil, as determined by 40 CFR 60.43b(d), shall be less than 10%. If the annual capacity factor of natural gas is greater than 10%, then the facility shall be subject to §60.44b.

c. (1) None of the four individual municipal solid waste incinerators shall be charged in excess of 226.9 mmBtu/hr and 605 tons per day MSW (110% rated capacity) nor produce in excess of ~~139,500 lbs/hr~~ of steam (3-hr rolling average). *186,000 AMENDED 2/9/89*

(2) The temperature of the flue gas exiting the final combustion chamber of the incinerator shall not be less than 1800°F.

d. Compliance Tests

(1) a. Annual compliance tests for particulate matter, lead, SO₂, nitrogen oxides, CO, fluorides, mercury, and beryllium shall be conducted in accordance with 40 CFR 60.8 (a), (b), (d), (e), and (f).

b. Compliance with the opacity standard for the incinerator stack emissions in condition 1.a. of this part shall be determined in accordance with 40 CFR 60.11 (b) and (e).

- c. Compliance with the emission limitation for 65% control of total sulfur dioxide emissions shall be determined by using the test methods in condition 1.d.(2) and sampling for SO₂ emissions before and after the acid gas control device. Continuous emissions data shall also be used to demonstrate compliance with the SO₂ concentration limits in condition 1.a. above.
- (2) The following test methods and procedures for 40 CFR Parts 60 and 61 shall be used for compliance testing:
- a. Method 1 for selection of sample site and sample traverses.
 - b. Method 2 for determining stack gas flow rate when converting concentrations to or from mass emission limits.
 - c. Method 3 for gas analysis for calculation of percent O₂ and CO₂.
 - d. Method 4 for determining stack gas moisture content to convert the flow rate from actual standard cubic feet to dry standard cubic feet for use in converting concentrations in dry gases to or from mass emission limits.
 - e. Method 5 for concentration of particulate matter and associated moisture content. One sample shall constitute one test run.
 - f. Method 9 for visible determination of the opacity of emissions.
 - g. Method 6 for concentration of SO₂. Two samples, taken at approximately 30 minute intervals, shall constitute one test run.
 - h. Method 7 for concentration of nitrogen oxides. Four samples, taken at approximately 15 minute intervals, shall constitute one test run.
 - i. Method 10 for determination of CO concentrations. One sample constitutes one test run.
 - j. Method 12 for determination of lead concentration and associated moisture content. One sample constitutes one test run.
 - k. Method 13B for determination of fluoride concentrations and associated moisture content. One sample shall constitute one test run.
 - l. Method 101A for determination of mercury emission rate and associated moisture content. One sample shall constitute one test run.
 - m. Method 104 for determination of beryllium emission rate and associated moisture content. One sample shall constitute one test run.

2. Compliance with emission limitations specified in lb/mmBtu in conditions 1.a. and 1.c. of this part shall be determined by calculating an "F" factor in dscf/mmBtu corrected to 12% CO₂ using the boilers' efficiency (as determined by the calorimeter method contained in Attachment A during acceptance testing) and the measured steam production. Data obtained from test methods required in condition 1.d. of this part for compliance testing shall be used for the calculation of the "F" factor required by this condition.
3. Devices shall be installed to continuously monitor and record steam production, the final combustion chamber temperature, and flue gases temperature at the exit of the acid gas removal equipment. These devices shall be adequately maintained and operating during all periods of operation.
4. The height of each boiler exhaust stack shall not be less than 61.0 meters above ground level at the base of the stack.
5. Each incinerator boiler shall have a metal name plate affixed in a conspicuous place on the shell showing manufacturer, model number, type waste, rated capacity, and certification number.
6. The permittee must submit to EPA and DER, within fifteen (15) days after it becomes available to the County, copies of technical data pertaining to the incinerator boiler design, acid gas control equipment design, particulate control equipment design, and the fuel mix that will be used to evaluate compliance of the facility with the preceding emission limitations.
7. Fuel

The Resource Recovery Facility shall utilize refuse such as garbage and trash (as defined in Chapter 17-7, FAC) but not grease, scum, grit screenings or sewage sludge.

8. Air Pollution Control Equipment

The permittee shall install, continuously operate, and maintain the following air pollution controls to minimize emissions. Controls listed shall be fully operational upon startup of the proposed equipment.

- a. Each boiler shall be equipped with a particulate emission control device for the control of particulates.
- b. Each boiler shall be equipped with an acid gas control device designed to remove at least 90% of the acid gases.
- c. The temperature of flue gases exiting the acid gas control equipment shall not exceed 300°F.

9. Continuous Emission Monitoring

a. Prior to the date of startup and thereafter, the County shall install, maintain, and operate the following continuous monitoring systems for each boiler exhaust stack:

- (1) Continuous emission monitoring (CEM) systems to measure stack gas opacity and SO₂, NO_x, CO, CO₂, and O₂ concentrations for each unit. Continuous monitors for SO₂ shall be installed after the acid gas control device for each unit. The systems shall meet the EPA monitoring performance specifications of 40 CFR 60.13 and 40 CFR 60, Appendix B, during initial compliance testing and annually thereafter. Additionally, CEM's shall meet the quality control requirements of 40 CFR 60, Appendix F (Attachment B).
- (2) CEM data recorded during periods of startup, shutdown, and malfunction shall be reported but excluded from compliance averaging periods for CO, NO_x, and opacity.
- (3) a. CEM data recorded during periods of startup and shutdown shall be excluded from compliance averaging periods for SO₂.
 b. CEM data recorded during periods of acid gas control device malfunctions shall be excluded from compliance averaging periods for SO₂ provided that the preceeding thirty day period which ends on the last day of the malfunction period meets an average SO₂ emission limit equal to the SO₂ limit specified in condition 1.a. CEM data must be available for 90% of the operating time for this exemption to apply. A malfunction as used in this permit means any sudden and unavoidable failure of air pollution control equipment or process equipment or of a process to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.
- (4) The temperatures of the final combustion chamber of the turnace and flue gases exiting the acid gas control device shall be continuously monitored.

b. An excess emissions report shall be submitted to EPA for every calendar quarter. The report shall include the following:

- (1) The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and completion of each period of excess emissions (60.7(c)(1)).

PSD AIR PERMIT

-6-

- (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace/boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measures adopted shall also be reported (60.7(c)(2)).
- (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments (60.7(c)(3)).
- (4) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report (60.7(c)(4)).
- (5) ^{Whole Laboratory} County shall maintain a file of all measurements, including continuous monitoring systems performance evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by this permit recorded in a permanent form suitable for inspection (60.7(d)).
- (6) Excess emissions shall be defined as any applicable period during which the average emissions of CO, NO_x, and/or SO₂, as measured by the continuous monitoring system, exceeds the CO, NO_x, and/or SO₂ maximum emission limit (in ppm) set for each pollutant in condition 1.a. above.

c. Excess emissions indicated by the CEM systems shall be considered violations of the applicable opacity limit or operating emission limits (in ppm) for the purposes of this permit provided the data represents accurate emission levels and the CEM's do not exceed the calibration drift (as specified in the respective performance specification tests) on the day when initial and subsequent compliance is determined. The burden of proof to demonstrate that the data does not reflect accurate emission readings shall be the responsibility of the permittee.

10. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up or shutdown shall be prohibited.

11. Reporting

- a. A copy of the results of the compliance tests shall be submitted within ~~forty-five~~ ^{45 DAYS -} days of testing to the DER Bureau of Air Quality Management, the DER Southeast Florida District Office, Broward County, and EPA Region IV.
- b. Continuous emissions monitoring data shall be reported to the DER Southeast District Office and EPA Region IV on a quarterly basis in accordance with Section 17-2.710, FAC, and 40 CFR 60.7.

c. Addresses for submitting reports are:

EPA Region IV

Chief, Air Compliance Branch
U.S. Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Florida Department of Environmental Regulation (DER)

Deputy Chief, Compliance and Ambient Monitoring
Bureau of Air Quality Management
Florida Department of Environmental
Regulation (DER)
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Southeast District Office of DER

District Manager
Department of Environmental Regulation
3301 Gun Club Road
P.O. Box 3858
West Palm Beach, Florida 33402

Broward County

Broward County Environmental Quality
Control Board
500 Southwest 14th Court
Ft. Lauderdale, Florida 33315

PART II. - General Conditions

1. The permittee shall comply with the notification and record-keeping requirements codified at 40 CFR Part 60.7. In addition, the permittee shall provide EPA with 30 days notice prior to conducting any compliance testing required under condition 1.a.
2. The permittee shall retain records of all information resulting from monitoring activities and information indicating operation parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording. 2 years
3. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide EPA with the following information in writing within five (5) days of such condition:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of the aforementioned information does not constitute a waiver of the emission limitations contained within this permit.

4. Any proposed change in the information contained in the final determination regarding facility emissions or changes in the quantity or quality of materials processed that would result in new or increased emissions or ambient air quality impact must be reported to EPA. If appropriate, modifications to the permit may then be made by EPA to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein. Any construction or operation of the source in material variance with the final determination shall be considered a violation of this permit.
5. In the event of any change in control of ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit and EPA of the change in control of ownership within 30 days.
6. The permittee shall allow representatives of the state and local environmental control agency or representatives of the EPA, upon presentation of credentials:

- (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of this permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Clean Air Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emissions of pollutants; and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
7. The conditions of this permit are severable, and if any provision of this permit or the application of any provisions of this permit to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected.