

SOLID WASTE AUTHORITY

OF PALM BEACH COUNTY

5114 Okeechobee Boulevard, Suite 2C
West Palm Beach, Florida 33417
Telephone: 407/471-5770

September 18, 1989



Mr. Buck Oven, Program Coordinator
Power Plant Site Certification Program
Florida Department of Environmental Regulation
2600 Blainstone Road
Tallahassee, FL 32301

Re: Solid Waste Authority of Palm Beach County
North County Regional Resource Recovery Project
Understanding of Regulatory Agency Expectations

RECEIVED

OCT 4 1989

DER-BAQM

Dear Mr. Oven:

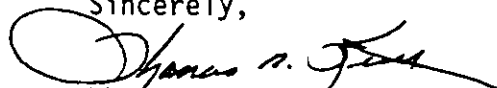
On September 15, 1989, representatives of the Solid Waste Authority of Palm Beach County met with representatives of Region IV, United States Environmental Protection Agency, and your Department (Mr. Pradeep Ravel) for the purposes of clarifying our understanding of the regulatory agencies' expectations relative to initial operations of the Authority's North County Regional Resource Recovery Facility. Pursuant to that meeting, and in accordance with direction provided by your representative, the Authority seeks your written concurrence with the following statements.

It is the Authority's understanding that as the Permittee, under both the State Conditions of Certification and the Federal PSD permits, that it maintains sole responsibility to the regulatory agencies for compliance with permit limitations. Consequently the Authority, as permittee, would be the party subject to any State or Federal action which might be instituted pursuant to the referenced permits and not the Authority's Contract Operator.

It is the Authority's further understanding that the 180-day initial start-up period provided by the Conditions of Certification and the PSD Permit is a shake-down period during which excursions, with respect to actual facility emissions, are not unexpected and do not constitute permit violations nor grounds for enforcement actions as long as the Facility is operated in accordance with generally accepted good operating and combustion practices.

I trust that Mr. Raval has relayed the urgent nature of the Authority's need to have the foregoing understandings confirmed by the Department. Your efforts to expedite your review and comment to this office would be most appreciated.

Sincerely,


Thomas R. Keith
Deputy Executive Director

TRK/ja.
cc: Bernie Conko
Craig Potter

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PALM BEACH COUNTY

VOLATILE ORGANIC COMPOUNDS (VOC'S)

B&W	DRAFT PERMIT
0.045 LB/MMBtu <i>≈ 70 ppm</i>	0.016 LB/MMBtu
<ul style="list-style-type: none">- Agrees with CARB Report- Consistent with Operating Data	

POSSIBLE CAUSES OF DIFFERENCE:

- Combustion System Design
- Test Method
- Data Base
- Definition of VOC
- Interpretation of Test Data

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BEST AVAILABLE CONTROL TECHNOLOGY

- Dry Scrubber

- High Efficiency Precipitator (~ 99.75% Removal)
(State of the Art for a Dry Scrubber)

- Low Gas Temperature (Less than 300°F)

- Aluminum and Ferrous Recovery

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PARTICULATE AND OPACITY

	<u>B&W</u>	<u>Draft Permit</u>
TSP	Changing to Meet - 0.015 GR/DSCF @ 12% CO ₂	0.015 GR/DSCF @ 12% CO ₂
Opacity	15% 20% (3 Minutes/1 Hour)	15% 20% (3 Minutes/1 Hour)

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NOx AND CO

	<u>B&W</u>	<u>Draft Permit</u>
NOx	0.50 LB/MMBtu	0.32 LB/MMBtu
CO	0.22 LB/MMBtu	0.44 LB/MMBtu (400 PPMV)

- Consistent with Modern Operating Units of Good Design
- Represents Optimum Combustion
- Fuel Nitrogen Variability
- Consistent with NSPS for Solid Fossil Fuels
- NOx vs. CO Tradeoffs
- Consideration of Trace Organics

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LEAD, MERCURY, BERYLLIUM

-----B&W Prediction-----

	<u>Uncontrolled</u>	<u>W/Precip Only</u>	<u>Plus Dry Scrubber</u>	<u>Draft Permit</u>	<u>Add'l Removal Required</u>
Lead	0.03710	0.00075	BACT	0.0004	47%
Mercury	0.000912	0.000912	BACT	0.00024	74%
				3200 GM/Day	
Beryllium	9.8E-6	1.2E-7	BACT	7.3E-7	None

NOTE: Numbers are in Lbs/Million BTU Fuel Input (LB/MMBtu)

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ACID GASES (HCl, SO₂, HF, H₂SO₄)

	Uncontrolled	---Dry Scrubber---		Draft Permit	Requested
	Emission	Design	Outlet		Change
	<u>LB/MMBtu</u>	Removal	<u>LB/MMBtu</u>	<u> </u>	<u>To Permit</u>
		%			
HCl	1.20	90	0.12	90% Removal	24 Hr Avg; Need Floor, 0.05 LB/MMBtu
SO ₂	0.73	65	0.26	0.32 LB/MMBtu; 0.62 LB/MMBtu, 1 Hr Max	24 Hr Avg
HF	0.00325	BACT	BACT	0.0032 LB/MMBtu 90% Removal	BACT
H ₂ SO ₄	0.018	BACT	BACT	3.2E-5 LB/MMBtu (?) 90% Removal	BACT

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SUMMARY

HCl	90% Removal or 0.05 LB/MMBtu, Whichever First Achieved; 24 Hour Average
SO ₂	0.32 LB/MMBtu, 24 Hour Average
HF	BACT
H ₂ SO ₄	BACT
TSP	0.015 GR/DSCF @ 12% CO ₂
Opacity	15%; 20% Maximum, 3 Minutes/1 Hour
Pb	BACT
Hg	BACT
Be	BACT
NOx	0.50 LB/MMBtu
CO	0.22 LB/MMBtu (200 PPMV @ 12% CO ₂)
VOC	0.045 LB/MMBtu

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BOILER CAPACITY
PER BOILER

	-----B&W-----		Draft
	<u>Normal</u>	<u>Peak</u>	<u>Permit</u>
Fuel Input (MMBtu/Hr)	380.4	412.5	360.0
RDF Flow (Lb/Hr)			
a 6164 Btu/Lb			58333
a 5500 Btu/Lb (Design)	69164	75000	

NOTE: Permit is for Three Boilers.

File Copy

PM
7-28-89
Atlanta, Ga



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

RECEIVED
JUL 31 1989
DER-BAQW

4APT/APB-aes

JUL 28 1989

Mr. Douglas E. Burnham
Babcock and Wilcox Company
Power Generation Group
20 S. Van Buren Avenue
Post Office Box 351
Barberton, Ohio 44203-0351

Re: Palm Beach County Solid Waste Resource Recovery Facility
PSD-FL-108

Dear Mr. Burnham:

This is to acknowledge the receipt of your letter dated July 7, 1989, transmitting the protocol procedure for measuring emissions of multiple metals from stationary sources and a write-up on the proposed method 13B procedure for determining HF and HCl emissions.

The documents have been reviewed by our staff and it is our opinion that these methods are acceptable for use in the compliance of the above referenced source.

Thank you for transmitting these documents and for your cooperation in this matter. If you have any further questions, please contact Gregg Worley of my staff at (404) 347-2864.

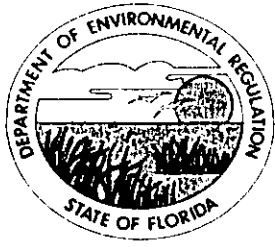
Sincerely yours,

Wayne J. Arnsperger

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Marc Broner - Solid Waste Authority
C. H. Fancy - Florida DER

CHF/BT/PA
Barry Andrews
Pradeep Raval
Tom Rogers
Gene Sacco - PBC
Isidore Goldman
} 8-1-89 RAN



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 30, 1989

Marc C. Bruner, Ph.D
Section Chief
Environmental Programs
Solid Waste Authority
of Palm Beach County
5114 Okeechobee Blvd, Suite 2C
West Palm Beach, Florida 33417

Dear Dr. Bruner:

This letter is in response to your call of June 29, 1989 asking for clarification of the Department's position on the proper stack sampling methods for your facility's initial performance tests and which method(s), if any, may require an Alternate Standard or Procedure (ASP) request.

After review of the Conditions of Certification and the PSD permit, and in light of the recent adoption of test methods in the Corrective Amendment II rule package, all of the EPA promulgated methods are acceptable. However, an ASP request will be needed for the metals method (MMTL) as this method has not been promulgated and it will need technical review by the State and the EPA, and the approval of the Secretary for use.

Please send your request for an ASP, if you still desire to use the MMTL, to Secretary Twachtmann at the letter head address.

Please call me at (904) 488-1344 if you have any questions on the above.

Sincerely,

James K. Pennington, P.E.
Administrator
Compliance Monitoring Section
Bureau of Air Quality
Management

JKP/htp

cc: Isidore Goldman
Clair Fancy