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SEP 30 2008

September 22, 2008

Mr. Jonathan K. Holtom, P.E.  
Acting Program Administrator  
Title V Section  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399

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BUREAU OF AIR REGULATION

**Subject:** Solid Waste Authority of Palm Beach County  
North County Resource Recovery Facility  
Comments to Draft Air Construction Permit No. 0990234-012-AC and  
Draft Title V Air Operation Permit No. 0990234-013-AV

Dear Mr. Holtom:

The Solid Waste Authority of Palm Beach County (SWA) and CDM received the Florida Department of Environmental Protection's (FDEP) draft Air Construction Permit No. 0990234-012-AC and Draft Title V Permit No. 0990234-013-AV for the North County Resource Recovery Facility (NCRRF). The following is a compilation of SWA's and CDM's comments on the draft permit.

#### **General Comment through All Documents**

The existing 1,800-scfm flare (New EU #020) at the Class III Landfill will only be used as a back-up at the Class III Landfill. Suggest addition of "at the Class III Landfill" after all references made to this flare being used as a back-up.

#### **Draft Air Construction Permit - Specific Conditions**

Item 2. Capacity and Potential to Emit (PTE) on page 5 of 12 limits the flow rates of the flares on a million ft<sup>3</sup>/yr basis. All previous permits have established the flow rate limits on a scfm basis. SWA and CDM request that the flow rate limits for the new air construction and Title V permit remain on a scfm basis.

Item 2 also states that "Total landfill gas flow to the flares shall be continuously measured and recorded." SWA and CDM would like to clarify that, since the existing Class III flare (new EU #020) will only be used as a back-up flare, the landfill flow rates to this flare will only be continuously monitored if it is put into service due to a major malfunction of the main Class III flare (the relocated and de-rated flare (EU #004).

Item 6. Sampling and Analysis of Sulfur Content of Gas on page 6 of 12 requires that ASTM method D-3246-81 be used to determine the sulfur content of the gas. We cannot find this





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ASTM method on the ASTM database. The current permit requires that sulfur content of the gas be determined using ASTM method D1072-90 or later method. ASTM method D5504 is the most recent method used to determine sulfur content; therefore, we would suggest keeping the current permit's wording or using ASTM method D5504.

Item 6 on page 6 of 12 also requires that SO<sub>2</sub> calculations in tons per year (TPY) be included in the annual operating report (AOR). The SO<sub>2</sub> calculations are not part of the current AOR, and we would request that this requirement be removed.

Item 7. Initial Compliance Demonstration on page 6 of 12 requires that an initial compliance test be performed on the Class I and Class III flares. CDM and SWA will be performing initial compliance testing on the new Class I flare and the relocated and de-rated Class III flare. Since the existing Class III flare will only be used as a back-up at the Class III landfill, and due to the fact that it was tested for compliance during the month of August 2008 (as required by the current permit), we are requesting that FDEP not require an initial compliance test for this unit.

#### **Draft Title V Air Operation Permit - Statement of Basis**

The Statement of Basis states that "The facility is decommissioning the existing emergency generators listed in Appendix I-1. These units are therefore removed from this Appendix." The SWA does not intend to decommission the emergency diesel generator for the Resource Recovery Facility (RRF) nor the emergency diesel generator for the Utilities Facility.

The original application submitted to FDEP on March 25, 2008, included the addition of two new generators at the NCRRF. The first new generator was to be installed in the new landfill scalehouse, and the second new generator was to be installed in the new landfill operations and maintenance building. The two generators that would have been decommissioned were the ones at the existing landfill scalehouse not the ones at the RRF and nor the one at the Utilities Facility. Since the submittal of the application in March, SWA has decided to cancel the construction of the new landfill scalehouse and continue the operation of the existing landfill scalehouse; therefore, the only new generator requested under this application is the generator for the new landfill operations and maintenance building. The emergency generators at the existing landfill scalehouse will not be decommissioned. We request that the emergency diesel generators for the RRF and the Utilities Facility be kept in Appendix I-1 in the new permit.

#### **Draft Title V Air Operation Permit - Specific Conditions**

Specific Condition B.0.c. on page 5 shows the gas flow rate limits of the flares on a million ft<sup>3</sup>/yr basis. All previous permits have established the flow rate limits on a scfm basis. SWA and CDM request that the flow rate limits for the new air construction and Title V permit



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remain on a scfm basis. SWA would also like to keep the current permit's Specific Condition B.47 Landfill Gas Flow Rate in the new Title V Permit, as it includes specific requirements for determining the actual gas flow rates.

Specific Condition B.0.c. also states that "Total landfill gas flow to the flares shall be continuously measured and recorded." SWA and CDM would like to clarify that, since the existing Class III flare (New EU #020) will only be used as a back-up flare, the landfill flow rates to this flare will only be continuously monitored if it is put into service due to a major malfunction of the main Class III flare (the relocated and de-rated flare (EU #004)).

Specific Condition B.0.e. on page 5 requires that ASTM method D-3246-81 be used to determine the sulfur content of the gas. We cannot find this ASTM method on the ASTM database. The current permit requires that sulfur content of the gas be determined using ASTM method D1072-90 or later method. ASTM method D5504 is the most recent method used to determine sulfur content; therefore, we would suggest keeping the current permit's wording or using ASTM method D5504.

Specific Condition B.0.e. on page 5 also requires that SO<sub>2</sub> calculations in tons per year (TPY) be included in the annual operating report (AOR). The SO<sub>2</sub> calculations are not part of the current AOR, and we would request that this requirement be removed from the new permit.

We appreciate this opportunity to comment on the draft permit. If you have any questions, please feel free to contact me at 561-689-3336.

Very truly yours,

Manuel Hernandez, P.E.  
Florida Professional Engineer No. 59796  
Project Manager  
Camp Dresser & McKee Inc.

MJH/wlb

Attachments

cc: Mary Beth Morrison, SWA  
Patrick Carroll, SWA  
Scott M. Sheplak, FDEP

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