



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

January 13, 2010

Sent via Electronic Mail

mhammond@swa.org

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

Re: Additional Information, File Number 0990234-016-AV
Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility
North County Resource Recovery Facility

Dear Mr. Hammond:

On November 19, 2009, the Department received a Title V air operation permit revision application for the subject facility via Electronic Permit Submittal and Processing System (EPSAP). The North County Resource Recovery Facility is located at 7501 North Jog Road, West Palm Beach in Palm Beach County, Florida.

In order to continue processing your application, the Department needs 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 permit application form.

1. **Initial Compliance Testing:** The emissions units under this project, e.g., sludge dryers and recycle material bin/pellet storage silos, are required to demonstrate initial compliance. The permit revision application indicated that the sludge dryers had been tested on September 10-12, 2009. The cover page for the sludge dryers' test report was submitted as an attachment. The cover page simply conveyed the test report.
 - a. Was compliance successfully demonstrated by the sludge dryers and the recycle material bin/pellet storage silos? What were the actual test results? Please prepare a chart showing the actual test results versus the emission standards/limitations.
 - b. At what process rate were the dryers tested in wet tons of sludge per day? Were the dryers tested while firing landfill gas?
2. **New Applicable Requirements - Engines:** Permit No. 0990234-006-AC/PSD-FL-108F, was originally issued on February 3, 2006. Subsequent to this permit, several new federal regulations have been promulgated by U.S. EPA and adopted by the State of Florida. Some of these new federal regulations may be new applicable requirements applying to certain types of engines.
 - a. **New Applicable Requirements - New Source Performance Standards (NSPS) Requirements from 40 Code of Federal Regulations (CFR) 60:**
40 CFR 60 Subpart IIII also known as (a.k.a.) NSPS "4-I's" or "CI-ICE"
U.S. EPA promulgated on July 11, 2006, the NSPS for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) under 40 CFR 60 Subpart IIII. This new NSPS applies to new engines. Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(8)(b), Florida Administrative Code (F.A.C.).

Is the emergency generator an engine regulated under this new NSPS?

If not, please provide key non-applicability descriptors to show that the engine is clearly not subject to these new NSPS, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, etc.

- b. New Applicable Requirements - National Emissions Standards for Hazardous Air Pollutants (NESHAP) Requirements also known as (a.k.a) Maximum Available Control Technologies (MACT) from 40 CFR 63 Subpart ZZZZ:

40 CFR 63 Subpart ZZZZ a.k.a. MACT "4-Z's" or "RICE MACT"

U.S. EPA promulgated on February 24, 2004, the Reciprocating Internal Combustion Engines (RICE) MACT under 40 CFR 63 Subpart ZZZZ. This new MACT applies to new and existing engines at a Title V source that is a major source of hazardous air pollutants (HAP). Florida adopted this regulation by reference soon thereafter at Rule 62-204.800(11)(b), Florida Administrative Code (F.A.C.).

This facility is a major source of HAP. This new MACT may therefore apply. Is the emergency generator an engine regulated under the RICE MACT?

If not, please provide key non-applicability descriptors to show that the engine is clearly not subject to the RICE MACT, like 'existing,' model year/construction (manufacturer) date, manufacturer name, size of engine, e.g., equivalent brake horsepower (HP), type of engine, e.g., compression ignition (CI), etc.

These new federal regulations along with fact sheets are posted on the following U.S. EPA web site: <http://www.epa.gov/ttn/atw/combust/list.html>.

3. New Applicable Requirements - Compliance Assurance Monitoring (CAM). The U.S. EPA promulgated and the State of Florida adopted the CAM federal regulation, 40 CFR 64, at Rule 62-204.800, F.A.C., sometime around 2001. CAM may apply to pollutants for which federal standards were promulgated pre-1990 (see the CAM federal regulation, for the complete applicability). CAM does not apply to post-1990 federal standards for certain pollutants.
- Please address the applicability of CAM to the emissions units under this project, providing supporting details when CAM is not applicable.
 - Please address specifically the applicability of CAM to the sludge dryer train numbers 1 and 2. As part of the response, focus on the following air pollutant emission standards/limitations for NO_x, PM/PM₁₀, SO₂, CO, VOC and Hg including the pre-air pollution control device estimates of emissions in tons per year (TPY) along with the supporting calculations. If CAM in fact does apply, a CAM Plan will need to be submitted.
4. Cooling Towers: Do the cooling towers use chromium-based water treatment chemicals?
5. Sludge Dryers: Who was the manufacturer of the sludge dryer trains?

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), Florida Administrative Code (F.A.C.) requires that all applications for a Department Title V air operation permit must be certified by a professional engineer (P.E.) 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 responsible official (R.O.).

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North County Resource Recovery Facility
Page 3

Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within **ninety (90)** days or provide a written request for an additional period of time to submit the information.

If you should have any questions, you may 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: Mr. Manuel Hernandez, P.E., CDM: hernandezmj@cdm.com
Mr. Mike Halpin, P.E., DEP Siting: michael.halpin@dep.state.fl.us
Mr. Lennon Anderson, P.E., DEP SED: lennon.anderson@dep.state.fl.us
Mr. James E. Stormer, PBCHD: james_stormer@doh.state.fl.us
Ms. Victoria Gibson, DEP BAR: victoria.gibson@dep.state.fl.us (for reading file)

CDM Transmittal

RECEIVED

NOV 23 2009

BUREAU OF AIR REGULATION

CDM

1601 Belvedere Road, Suite 211 S
West Palm Beach, FL 33406
561-689-3336
561-689-9713

To: Elizabeth Walker
Organization/Address: FDEP Bureau of Air Regulation
2600 Blair Stone Road MS 5505
Tallahassee, Florida 32399-2400
Tel: 850-921-9505

From: Manuel Hernandez
Date: November 20, 2009

Re: Air Operations Permit- Solid Waste Authority of Palm Beach County
Application Number: 2471-1

Job #: 2678-73671-191

Via: *Mail:* *Overnight:* X *Courier:*

Enclosed please find:

For your information

X

For your review

X

For your signature

Approved

Approved as noted

Returned to you for correction

Message:

Ms. Walker:

Please find attached the EPSAP Professional Engineer Signature Document for the referenced application. Feel free to contact me if you have any questions.

Thanks and have a great day.

Signed



Electronic Permit Submittal and Processing System (EPSAP) Professional Engineer Signature Document

"This document is signed and sealed to secure the data in this permit application and any attached files that were submitted electronically as described in Florida Department of Business and Professional Regulation, Board of Professional Engineers, Procedures for Signing and Sealing Electronically Transmitted Plan, Specifications, Reports or other Documents, Rule 61G15-23.003., F.A.C.."

EPSAP Application Number: 2471-1

Facility Identification Number: 0990234

Facility Owner/Company Name: SOLID WASTE AUTHORITY OF PBC

Purpose of Application:

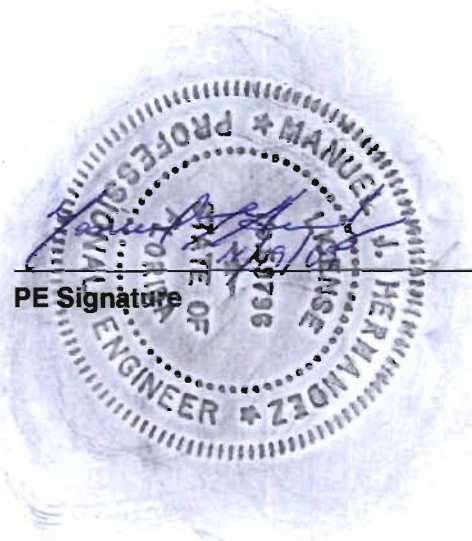
Title V air operation permit revision.

Signature File Created: 11/19/2009 8:54:57 AM

File Description	Authentication Code
Submitted Application Data	7C8880C88095DB0125AF5FFF2C7CAA26D13FCCD9
Uploaded Facility Documents:	
WLB3661 Att 1.pdf	C0326E979571524BEF4C93D5E8D67335D0E987E8
WLB3661 Att 1.pdf	C0326E979571524BEF4C93D5E8D67335D0E987E8
Uploaded Emissions Unit Documents:	
Generator Attachment.pdf	DA02A5252E4BFB1BE5C766747DD6CE24F23C41EA
bpf perf testing submit.pdf	9E6065D388A3E4A0FD6FA30CFA19211771D9F689
bpf perf testing submit.pdf	9E6065D388A3E4A0FD6FA30CFA19211771D9F689
Final Signature File	F778126F6794ADEBACE59C5F86EC0F0A533C9701

Professional Engineer (PE): MANUEL HERNANDEZ License No: 59796

(sign and affix PE seal below)



PE Signature

Nov. 19, 2009

Date

Friday, Barbara

To: mhammond@swa.org
Cc: hernandezmj@cdm.com; Halpin, Mike; Anderson, Lennon; 'James_Stormer@doh.state.fl.us'; Gibson, Victoria; Sheplak, Scott
Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility
Attachments: MarkHammondAdditionalInformation,FileNumber0990234-016-AV-NorthCountyResourceRecoveryFacilty.pdf

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, *noting that you can view the documents*, 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>> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

Barbara Friday
Bureau of Air Regulation
Division of Air Resources Management (DARM)
(850) 921-9524

Friday, Barbara

From: postmaster@swa.org
To: Mark Hammond
Sent: Thursday, January 14, 2010 11:17 AM
Subject: Delivered: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Your message has been delivered to the following recipients:

Mark Hammond

Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Friday, Barbara

From: Mark Hammond [mhammond@swa.org]
Sent: Thursday, January 14, 2010 3:16 PM
To: Friday, Barbara
Subject: RE: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Ms. Friday,

I have received the documents.

Mark Hammond

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Thursday, January 14, 2010 11:17 AM
To: Mark Hammond
Cc: hernandezmj@cdm.com; Halpin, Mike; Anderson, Lennon; James_Stormer@doh.state.fl.us; Gibson, Victoria; Sheplak, Scott
Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

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Barbara Friday
Bureau of Air Regulation
Division of Air Resources Management (DARM)
(850) 921-9524

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Microsoft Exchange
To: hernandezmj@cdm.com
Sent: Thursday, January 14, 2010 11:17 AM
Subject: Relayed: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

hernandezmj@cdm.com

Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Hernandez, Manuel [HernandezMJ@cdm.com]
Sent: Thursday, January 14, 2010 12:26 PM
Subject: Read: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Your message was read on Thursday, January 14, 2010 12:25:36 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Hernandez, Manuel [HernandezMJ@cdm.com]
Sent: Thursday, January 14, 2010 12:28 PM
To: Friday, Barbara
Subject: RE: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Received e-mail and have access to the attached document.

Manuel Hernandez, P.E.
Project Manager
CDM

****PLEASE NOTE THE CHANGE OF ADDRESS****

1601 Belvedere Road, Suite 400 East
West Palm Beach, FL 33406
Phone: 561-689-3336
Fax: 561-689-9713
Email: hernandezmj@cdm.com

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Thursday, January 14, 2010 11:17 AM
To: mhammond@swa.org
Cc: Hernandez, Manuel; Halpin, Mike; Anderson, Lennon; James_Stormer@doh.state.fl.us; Gibson, Victoria; Sheplak, Scott
Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

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Barbara Friday
Bureau of Air Regulation
Division of Air Resources Management (DARM)

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Friday, Barbara

From: Microsoft Exchange
To: Halpin, Mike; Gibson, Victoria; Anderson, Lennon
Sent: Thursday, January 14, 2010 11:17 AM
Subject: Delivered: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Your message has been delivered to the following recipients:

Halpin, Mike

Gibson, Victoria

Anderson, Lennon

Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Thursday, January 14, 2010 11:28 AM
Subject: Read: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Your message was read on Thursday, January 14, 2010 11:27:36 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: 'James_Stormer@doh.state.fl.us'
Sent: Thursday, January 14, 2010 11:17 AM
Subject: Relayed: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'James_Stormer@doh.state.fl.us'

Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: James_Stormer@doh.state.fl.us
To: Friday, Barbara
Sent: Thursday, January 14, 2010 11:17 AM
Subject: Read: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Your message was read on Thursday, January 14, 2010 11:17:21 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Sheplak, Scott
Sent: Thursday, January 14, 2010 11:17 AM
Subject: Delivered: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Your message has been delivered to the following recipients:

Sheplak, Scott

Subject: Title V Air Operation Permit Revision Application - Biosolids Pelletization Facility

Sent by Microsoft Exchange Server 2007