

P.E. CERTIFICATION STATEMENT

APPLICANT

Solid Waste Authority of Palm Beach County
North County Regional Resource Recovery Facility

Draft/Proposed Permit No. 0990234-022-AV

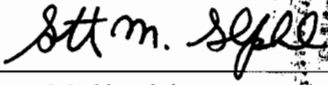
PROJECT TYPE: Title V Air Operation Permit Revision

PROJECT DESCRIPTION

This project is for a Title V air operation permit revision and for the concurrent processing of an air construction (AC)/Prevention of Significant Deterioration (PSD) permit revision. The Statement of Basis contains more details on the Title V air operation permit revision.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes (F.S.), and F.A.C. Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features). My licensed area of practice as a professional engineer under Chapter 471, F.S. is environmental (air pollution) engineering.

All applicable requirements are included in this project and the permit conditions are legally-defensible.



Date

Scott M. Sheplak

Professional Engineer (P.E.)

License Number 48866

Permitting Authority's Physical Location:

111 South Magnolia Drive, Suite 4

Tallahassee, Florida 32301

Telephone: 850/717-9074

Fax: 850/717-9097

E-mail: scott.sheplak@dep.state.fl.us

SMS/ejs

Permitting Authority's Mailing Address:

Florida Department of Environmental Protection

Division of Air Resource Management • Office of Permitting and Compliance • Key Industries - Minerals & Metals
2600 Blair Stone Road, Mail Station #5505 • Tallahassee, Florida 32399-2400



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Electronic Mail – Received Receipt Requested

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

Re: North County Regional Resource Recovery Facility
Draft/Proposed Permit No. 0990234-022-AV, Title V Air Operation Permit Revision
Draft Permit No. 0990234-021-AC/PSD-FL-108J, Air Construction Permit Revision

Dear Mr. Hammond:

Enclosed is the draft/proposed permit package for a Title V air operation permit revision and an air construction permit revision for the North County Regional Resource Recovery Facility. This facility is located in Palm Beach County at 7501 North Jog Road, West Palm Beach, Florida. The permit package includes the following documents:

- The Written Notice of Intent to Issue Air Permit provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue air permits; the procedures for submitting comments on the draft/proposed Title V air operation permit and the draft air construction permit revision; the process for filing a petition for an administrative hearing; and the availability of mediation.
- The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The Public Notice of Intent to Issue Air Permit must be published as soon as possible and the proof of publication must be provided to the Department within seven days of the date of publication. Because this permit is being processed as a combined draft/proposed permit in order to reduce processing time, a duplicate copy of the proof of publication must also be transmitted by electronic mail within seven days of the date of publication to Ms. Ana Oquendo at EPA Region 4 at the the following address: oquendo.ana@epamail.epa.gov.
- The Statement of Basis, which summarizes the facility, the equipment, and the primary rule applicability, and the changes since the last Title V renewal.
- The draft/proposed Title V air operation permit revision, which includes the specific permit conditions that regulate the emissions units covered by the proposed project.
- The Technical Evaluation and Preliminary Determination, which explains the revisions to the underlying construction permit conditions.
- The draft air construction permit revision.

Please submit any written comments you wish to have considered concerning the permitting authority's proposed action to Mr. Syed Arif, P.E., Program Administrator, Office of Permitting and Compliance Section, at the above letterhead address. If you have any questions, please contact the Project Engineer, Edward J. Svec, by telephone at 850/717-9031 or by email at ed.svec@dep.state.fl.us.

Sincerely,

Jeffery F. Koerner, Administrator
Permitting and Compliance Section
Division of Air Resource Management

11-21-11

Date

Enclosures
JFK/sa/sms/ejs

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an

Application for Title V Air Operation Permit by:

Solid Waste Authority of Palm Beach County
7501 North Jog Road
West Palm Beach, Florida 33412

Draft/Proposed Permit No. 0990234-022-AV
Draft Permit No. 0990234-021-AC/PSD-FL-108J
Facility ID No. 0990234
North County Regional Resource Recovery Facility
Title V Air Operation Permit Revision
Air Construction Permit Revision
Palm Beach County, Florida

Responsible Official:

Mr. Mark Hammond, Executive Director

Facility Location: Solid Waste Authority of Palm Beach County operates the North County Regional Resource Recovery Facility, which is located in Palm Beach County at 7501 North Jog Road, West Palm Beach, Florida.

Project: The purpose of this project is to revise Title V air operation permit No. 0990234-020-AV and to revise several miscellaneous provisions in the underlying air construction permits, for the above referenced facility. Details of the project are provided in the application; the enclosed Statement of Basis; and, the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for Title V air operation permits for facilities that contain acid rain units are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-213 of the Florida Administrative Code (F.A.C.). Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Office of Permitting and Compliance is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft permit, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permit by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit number shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit revision and a concurrent draft air construction permit revision to the applicant for the projects described above. The applicant has provided reasonable assurance that operation of the existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue final permits in accordance with the conditions of the draft/proposed Title V air operation permit and the draft air construction permit revision unless a response received in accordance with the following procedures results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at the above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit and the draft air construction permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed Title V air operation permit or the draft air construction permit revision, the Permitting Authority shall issue a revised draft/proposed Title V air operation permit or the draft air construction permit revision and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: ouendo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued after the conclusion of the 45-day EPA review period so long as no adverse comments are received that result in a different decision or significant change of terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following website address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

Executed in Tallahassee, Florida



Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

11-21-11

Date

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Title V Air Operation Permit (including the Public Notice, the Statement of Basis, the Draft/Proposed Permit Title V Air Operation Permit, the Technical Evaluation and Preliminary Determination, and the Draft Air Construction Permit Revision), or a link to these documents available electronically on a publicly accessible server, was sent by electronic mail with received receipt requested before the close of business on 11-21-11 to the persons listed below.

- Mr. Mark Hammond, SWA: mhammond@swa.org
Ms. Mary Beth Morrison, SWA: mmorrison@swa.org
Mr. Christopher Tilman, P.E., Malcolm Pirnie: christopher.tilman@arcadis-us.com
Mr. Lennon Anderson, P.E., DEP Southeast District Office: lennon.anderson@dep.state.fl.us
Mr. James Stormer, PBCHD: james_stormer@doh.state.fl.us
Ms. Cindy Mulkey, DEP Siting Office: cindy.mulkey@dep.state.fl.us
Ms. Heather Ceron, U.S. EPA Region 4: ceron.heather@epa.gov
Ms. Katy R. Forney, U.S. EPA Region 4: forney.kathleen@epa.gov
Ms. Ana Oquendo-Vazquez, U.S. EPA Region 4: oquendo.ana@epa.gov
Ms. Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)
Ms. Lynn Scarce, DEP OPC: lynn.scarce@dep.state.fl.us (for reading file)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Handwritten signature of Barbara Friday and date 11-21-11 with labels (Clerk) and (Date) below.

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Florida Department of Environmental Protection
Division of Air Resource Management, Office of Permitting and Compliance
Draft/Proposed Permit No. 0990234-022-AV, Title V Air Operation Permit Revision
Draft Permit No. 0990234-021-AC/PSD-FL-108J, Air Construction Permit Revision
Solid Waste Authority of Palm Beach County
North County Regional Resource Recovery Facility
Palm Beach County, Florida

Applicant: The applicant for this project is Solid Waste Authority of Palm Beach County. The applicant's authorized representative and mailing address is: Mr. Mark Hammond, Executive Director, Solid Waste Authority of Palm Beach County, North County Regional Resource Recovery Facility, 7501 North Jog Road, West Palm Beach, Florida 33412.

Facility Location: The applicant operates the existing North County Regional Resource Recovery Facility, which is located in Palm Beach County at 7501 North Jog Road in West Palm Beach, Florida.

Project: The applicant applied on September 16, 2011 to the Department for a Title V air operation permit revision. This is a revision of Title V air operation permit No. 0990324-020-AV. The existing facility is a municipal waste combustor plant designed to process 2,000 tons per day (TPD) of municipal solid waste (MSW). The facility burns processed MSW that is called "refuse derived fuel" (RDF). The RDF plant is equipped with three MSW processing lines, any two of which can handle the 2,000 TPD of incoming MSW. The boiler plant includes two Babcock & Wilcox (B&W) boilers (Nos. 1 and 2) with auxiliary burners. Each boiler was designed with a maximum heat input of 427.5 MMBtu/hr and a maximum steam production rating of 324,000 lbs/hour. At a reference heating value of 5,700 Btu/lb, this is equivalent to 900 TPD of RDF per boiler. The gross nominal electric generating capacity of the facility is 62 megawatts (MW).

Two landfills, a Class I Landfill and a Class III Landfill, each with its own gas collection system and flare, are located at the facility. Additional activities at the facility include: a composting facility, material processing systems, a metals recovery system, storage and handling systems for RDF; lime storage and processing facilities; storage and handling systems for ash and ash treatment; and, cooling towers. A biosolids pelletization facility (BPF) is located adjacent to the existing landfill

Permitting Authority: Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-213 of the Florida Administrative Code (F.A.C.). Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility. The Office of Permitting and Compliance is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/717-9000.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft/proposed Title V air operation permit, the Statement of Basis, the draft air construction permit revision, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft/proposed Title V air operation permit or the draft air construction permit revision by visiting the following website:

<http://www.dep.state.fl.us/air/eproducts/apds/default.asp> and entering the permit number shown above.

Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue a draft/proposed Title V air operation permit and a concurrent draft air construction permit revision for the project described above. The applicant has provided reasonable assurance that continued operation of existing equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. The Permitting Authority will issue final permits in accordance with the conditions of the draft/ proposed Title V air operation permit and draft air construction permit revision unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the draft/proposed Title V air operation permit and a concurrent draft air construction permit revision for a period of 30 days from the date of publication of the Public Notice. Written comments must be received by the close of business (5:00 p.m.), on or before the end of this 30-day period by the Permitting Authority at the above address. As part of his or her comments, any person may also request that the Permitting Authority hold a public meeting on this permitting action. If the Permitting Authority determines there is sufficient interest for a public meeting, it will publish notice of the time, date, and location in the Florida Administrative Weekly (FAW). If a public meeting is requested within the 30-day comment period and conducted by the Permitting Authority, any oral and written comments received during the public meeting will also be considered by the Permitting Authority. If timely received written comments or comments received at a public meeting result in a significant change to the draft/proposed Title V air operation permit or the draft air construction permit revision, the Permitting Authority shall issue a revised draft/proposed Title V air operation permit or a revised draft air construction permit revision and require, if applicable, another Public Notice. All comments filed will be made available for public inspection. For additional information, contact the Permitting Authority at the above address or phone number.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS

proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

EPA Review: EPA has agreed to treat the draft/proposed Title V air operation permit as a proposed Title V air operation permit and to perform its 45-day review provided by the law and regulations concurrently with the public comment period, provided that the applicant also transmits an electronic copy of the required proof of publication directly to EPA at the following email address: oquenodo.ana@epamail.epa.gov. Although EPA's 45-day review period will be performed concurrently with the public comment period, the deadline for submitting a citizen petition to object to the EPA Administrator will be determined as if EPA's 45-day review period is performed after the public comment period has ended. The final Title V air operation permit will be issued at the conclusion of the 45-day EPA review period so long as no adverse comments are received that results in a different decision or significant change in terms or conditions. The status regarding EPA's 45-day review of this project and the deadline for submitting a citizen petition can be found at the following web site address: <http://www.epa.gov/region4/air/permits/Florida.htm>.

Objections: Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 days of the expiration of the Administrator's 45-day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to the issuance of any Title V air operation permit. Any petition shall be based only on objections to the Permit that were raised with reasonable specificity during the 30-day public comment period provided in the Public Notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460. For more information regarding EPA review and objections, visit EPA's Region 4 web site at <http://www.epa.gov/region4/air/permits/Florida.htm>.

STATEMENT OF BASIS

Solid Waste Authority of Palm Beach County
North County Regional Resource Recovery Facility

Draft/Proposed Permit No. 0990234-022-AV, Title V Air Operation Permit Revision

APPLICANT

The applicant for this project is the Solid Waste Authority of Palm Beach County. The applicant's responsible official and mailing address are: Mr. Mark Hammond, Executive Director, Solid Waste Authority of Palm Beach, 7501 North Jog Road, West Palm Beach, Florida 33412.

FACILITY DESCRIPTION

The North County Regional Resource Recovery Facility is located in Palm Beach County at 7501 North Jog Road, West Palm Beach, Florida.

This existing facility is a municipal waste combustor plant designed to process 2,000 tons per day (TPD) of municipal solid waste (MSW). The facility burns processed MSW that is called "refuse derived fuel" (RDF). The RDF plant is equipped with three MSW processing lines, any two of which can handle the 2,000 TPD of incoming MSW. The boiler plant includes two Babcock & Wilcox (B&W) boilers (Nos. 1 and 2) with auxiliary burners. Each boiler was designed with a maximum heat input of 427.5 MMBtu/hr and a maximum steam production rating of 324,000 lbs/hour. At a reference heating value of 5,700 Btu/lb, this is equivalent to 900 TPD of RDF per boiler. The gross nominal electric generating capacity of the facility is 62 megawatts (MW).

Two landfills, a Class I Landfill and a Class III Landfill, each with its own gas collection system and flare, are located at the facility. Additional activities at the facility include: a composting facility, material processing systems, a metals recovery system, storage and handling systems for RDF; lime storage and processing facilities; storage and handling systems for ash and ash treatment; and, cooling towers. A biosolids pelletization facility (BPF) is located adjacent to the existing landfill.

The facility is owned by the Solid Waste Authority.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility to reflect the refurbishment of the two existing municipal solid waste combustors (Units 1 and 2) previously authorized by Permit No. 0990234-015-AC/PSD-FL-108H and to incorporate minor revisions from Permit No. 0990234-021-AC/PSD-FL-108J, issued concurrently with this permit.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision and Application for Concurrent Air Construction/PSD Permit Revision was received on September 16, 2011.

Received information supporting the request to make the carbon silo an insignificant emissions unit in the Title V permit on October 4, 2011.

Received a request to eliminate the annual test requirement for ammonia on October 26, 2011.

Draft Air Construction Permit Revision clerked (issued) on **Month day**, 2011.

Draft/Proposed Title V Air Operation Permit Renewal posted onto web site on **Month day**, 2011.

Public Notice published on **Month day**, 2011.

Notification to U.S. EPA Region 4 of Publication of Public Notice on **Month day**, 2011.

STATEMENT OF BASIS

PRIMARY REGULATORY REQUIREMENTS

Title I: This facility is a major source of hazardous air pollutants (HAP), based on the Title V air operation permit renewal application.

NESHAP: This facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 Code of Federal Regulations (CFR) 63.

Title IV: This facility does not operate units subject to the acid rain provisions of the Clean Air Act.

Title V: This facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: This facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: This facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

CAIR: This facility does not operate units subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

Siting: This facility operates units subject to the power plant siting provisions of Chapter 62-17, F.A.C.

CAM: The BPF sludge dryer trains (Emissions Unit ID Nos. 010 and 011) are subject to Compliance Assurance Monitoring (CAM). A CAM Plan is included in this permitting action.

The remaining emissions units at this facility are not subject to CAM for one or more of the following reasons: they do not trigger the potential pre-air pollution control device major source emission thresholds; they demonstrate continuous compliance with a continuous emission monitoring system (CEMS); they are not equipped with air pollution control device(s); they are equipped with device(s) which are considered to be inherent to the process/operation; or, they satisfy CAM by meeting the post-1990 40 CFR 60 Subparts Cb/Eb federal monitoring requirements for the same or similar air pollutants.

The U.S. EPA letter dated July 7, 1999 (attached to permit), supports the use of monitoring under the post-1990 40 CFR 60 Subparts Cb/Eb to satisfy CAM for the same air pollutants and mentions the use of surrogate pollutants for similar air pollutants. Air pollutants specifically regulated under 40 CFR 60 Subparts Cb/Eb for Municipal Waste Combustors (MWCs) are: total particulate matter (PM); metals and metal compounds (cadmium (Cd), mercury (Hg) and lead (Pb)); all acid gases (including, but not limited to, sulfur dioxide (SO₂) and hydrogen chloride (HCl) gases); organic compounds (includes dioxins/furans (D/F)); nitrogen oxides (NO_x); and, carbon monoxide (CO). In addition to the air pollutant limits specified under 40 CFR 60 Subparts Cb/Eb for MWCs, some of the same air pollutants are regulated for other reasons i.e., PSD BACT, state implementation plan (SIP) standard, etc. A streamlined approach for multiple emission limits of the same air pollutant is preferred for simplified monitoring. As outlined in the U.S. EPA letter and described herein, monitoring under the post-1990 40 CFR 60 Subpart Cb/Eb for the RDF Boiler Nos. 1 and 2 is therefore, deemed to be adequate for the same air pollutants.

The BPF recycle material bin and pellet storage silo baghouses (Emissions Unit ID Nos. 012 & 014) are considered to be inherent to the process/operation. These baghouses are therefore exempt from CAM.

PROJECT REVIEW

Changes were made to the specific conditions of the renewed Title V air operation permit.

Permit

- AC/PSD Permit Revisions. The applicant requested the refurbishment of the two existing municipal solid waste combustors (Units 1 and 2) previously authorized by Permit No. 0990234-015-AC/PSD-FL-108H be included in the Title V permit. The refurbishment project consisted of adding or replacing some air pollution control (APC) systems, as well as maintenance, repair and in-kind replacement of other components of the facility. The project consisted of removing the existing electrostatic precipitators (ESP) and replacing them with new fabric filters; installing new selective non-catalytic reduction (SNCR) systems, installing new Activated carbon injection (ACI) systems; and, installing new combustion control systems and improved overfire air (OFA) systems. In addition, the concurrent processing of an air construction permit revision to change air construction/PSD permit conditions. See Permit No. 0990234-021-AC/PSD-FL-108J for the changes made. The Technical Evaluation and Preliminary Determination summarize these requested changes, the Department's responses and identify the changes made to the underlying air construction permit conditions. These changes have been reflected within the Title V air operation permit.

CONCLUSION

This project revises Title V air operation permit No. 0990234-020-AV, which was effective October 5, 2016.

North County Resource Recovery Facility



http://www.swa.org/site/information_and_documents/nccrf.htm

Solid Waste Authority of Palm Beach County
North County Regional Resource Recovery Facility

Facility ID No. 0990234
Palm Beach County

Title V Air Operation Permit Renewal

Draft/Proposed Permit No. 0990234-022-AV
(1st of Title V Air Operation Permit No. 0990234-020-AV)



Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400
Telephone: (850) 717-9000
Fax: (850) 717-9097

Compliance Authority:

State of Florida
Department of Environmental Protection
Southeast District Office
400 North Congress Avenue
West Palm Beach, FL 33401
Telephone: (561) 681-6600
Fax: (561) 681-6755

Title V Air Operation Permit Renewal

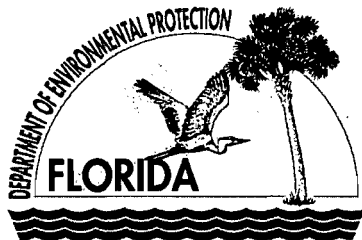
Final Permit No. 0990234-020-AV

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| Appendix 40 CFR 60 Subpart Cb, Emissions Guidelines (EG) and Compliance Times for Large Municipal Waste Combustors (version dated 03/24/2010). | |
| Appendix 40 CFR 60 Subpart Eb, NSPS for Large Municipal Waste Combustors (version dated 04/21/2008). | |
| Appendix 40 CFR 60 Subpart IIII "Generally Applicable Requirements," Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (version dated 07/11/2006). | |
| Appendix 40 CFR 60 Subpart WWW, NSPS for Municipal Solid Waste Landfills (version dated 08/06/2009). | |
| Appendix 40 CFR 61 Subpart A, NESHAP General Provisions (version dated 05/06/2004). | |
| Appendix 40 CFR 61 Subpart E, NESHAP for Mercury (version dated 03/20/03). | |
| Appendix 40 CFR 61 Subpart M "Set A," NESHAP for Asbestos (version dated 08/19/2004). | |
| Appendix 40 CFR 63 Subpart A, NESHAP General Provisions (version dated 01/29/2008). | |
| Appendix 40 CFR 63 Subpart AAAA, NESHAP for Municipal Solid Waste Landfills (version dated 08/06/2009). | |
| Appendix 40 CFR 63 Subpart ZZZZ "Generally Applicable Requirements," National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (version dated 06/30/2010). | |

Referenced Attachments. At End

- DEP approval dated October 25, 2005 regarding Landfill Higher Wellhead Operating Temperature.
- DEP approval dated December 13, 2005 regarding Landfill Gas Well Inactivation Plan.
- Table 1, Summary of Air Pollutant Standards and Terms.
- Table 2, Compliance Requirements.
- Table E-1. Summary of Maintenance Requirements for Engines.
- Table L-1. Summary of Monitoring Requirements for MSW Landfills (40 CFR 60, Subpart WWW and 40 CFR 63, Subpart AAAA).
- Table L-2. Summary of Recordkeeping Requirements for MSW Landfills (40 CFR 60, Subpart WWW and 40 CFR 63, Subpart AAAA).
- Table L-3. Summary of Compliance Reporting Requirements for MSW Landfills (40 CFR 60, Subpart WWW and 40 CFR 63, Subpart AAAA).
- Table H, Permit History.
- U.S. EPA letter dated July 7, 1999 regarding CAM applicability for MWCs.
- U.S. EPA letter dated April 6, 2000 regarding Beryllium Containing Wastes.
- U.S. EPA approval letter dated June 7, 2002 regarding Reduction in Frequency of Surface Monitoring of Methane Gas Emissions.
- U.S. EPA e-mail dated January 22, 2009 regarding Testing Schedule for Fugitive Ash and HCl Emissions.



Florida Department of Environmental Protection

Bob Martinez Center
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Tallahassee, Florida 32399-2400

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Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

PERMITTEE:

Solid Waste Authority of Palm Beach County

Permit No. 0990234-022-AV

North County Regional Resource Recovery Facility

Facility ID No. 0990234

Project: Title V Air Operation Permit Revision

The purpose of this permit is to revise the Title V air operation permit for the above referenced facility to reflect the refurbishment of the two existing municipal solid waste combustors (Units 1 and 2) previously authorized by Permit No. 0990234-015-AC/PSD-FL-108H and to incorporate minor revisions from Permit No. 0990234-021-AC/PSD-FL-108J, issued concurrently with this permit. This existing facility is located in Palm Beach County at 7501 North Jog Road, West Palm Beach; UTM Coordinates: Zone 17, 585.82 km East and 2960.474 km North; Latitude: 26° 45' 53" North and Longitude: 80° 08' 12" West.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: [Date, 2011]

Renewal Application Due Date: February 23, 2016

Expiration Date: October 5, 2016

For the Division of Air Resource Management

(Signature)

(Date)

(Printed Name of Above Designee)

JFK/sa/sms

SECTION I. FACILITY INFORMATION.

Subsection A. Facility Description.

This existing facility is a municipal waste combustor plant designed to process 2,000 tons per day (TPD) of municipal solid waste (MSW). The facility burns processed MSW that is called "refuse derived fuel" (RDF). The RDF plant is equipped with three MSW processing lines, any two of which can handle the 2,000 TPD of incoming MSW. The boiler plant includes two Babcock & Wilcox (B&W) boilers (Nos. 1 and 2) with auxiliary burners. Each boiler was designed with a maximum heat input of 427.5 MMBtu/hr and a maximum steam production rating of 324,000 lbs/hour. At a reference heating value of 5,700 Btu/lb, this is equivalent to 900 TPD of RDF per boiler. The gross nominal electric generating capacity of the facility is 62 megawatts (MW).

Two landfills, a Class I Landfill and a Class III Landfill, each with its own gas collection system and flare, are located at the facility. Additional activities at the facility include: a composting facility, material processing systems, a metals recovery system, storage and handling systems for RDF; lime storage and processing facilities; storage and handling systems for ash and ash treatment; and, cooling towers. A biosolids pelletization facility (BPF) is located adjacent to the existing landfill.

The facility is owned by the Solid Waste Authority.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Subsection B. Summary of Emissions Units.

| E.U. ID No. | Brief Description |
|----------------------------------|---|
| <i>Regulated Emissions Units</i> | |
| 001 | Municipal Solid Waste Boiler No. 1 |
| 002 | Municipal Solid Waste Boiler No. 2 |
| 019 | Ash Building and Handling System |
| | |
| | Landfills and Flares |
| 004 | Class III Landfill and Flare (1,800 scfm, manufactured by LFG Specialties, model number PCF82018) |
| 008 | Class I Landfill and Flare (3,500 scfm, manufactured by Shaw LFG Specialties, model number CF1238110) |
| | |
| | Biosolids Pelletization Facility (BPF) |
| 010 | BPF Sludge Dryer Train #1 |
| 011 | BPF Sludge Dryer Train #2 |
| 012 | BPF Recycle Material Bin and Pellet Storage Silo for Sludge Dryer Train #1 |
| 014 | BPF Recycle Material Bin and Pellet Storage Silo for Sludge Dryer Train #2 |
| | |
| | Engines |
| 016 | Emergency Generator - Biosolids Pelletization Facility (BPF) (EPA Tier 3 certified) |
| 017 | Woody Waste Facility Diesel Engine (primary engine) |
| 021 | Emergency Generator - Operations Building (EPA Tier 3 certified) |

SECTION I. FACILITY INFORMATION.

| E.U. ID No. | Brief Description |
|--|---|
| 035 | Emergency Generator - North County Resource Recovery Facility (NCRRF) |
| 036 | Fire Water Pump - NCRRF |
| 037 | Emergency Generator - NCRRF Scalehouse |
| 038 | Emergency Generator - Utilities Facility |
| 039 | Emergency Generator - Landfill Scalehouse E1 |
| 040 | Emergency Generator - Landfill Scalehouse E2 |
| 041 | Emergency Generator - MIS |
| 042 | Emergency Generator - Administration |
| 043 | Emergency Generator - Materials Recovery Facility (MRF) (EPA Tier 2 certified) |
| <i>Unregulated Emissions Units and/or Activities</i> | |
| 005 | RDF Storage |
| 006 | RDF Processing Lines |
| 007 | Oversized Bulk Waste Processing Line |
| 018 | Cooling Towers (3) at North County Resource Recovery Facility (RRF) {The cooling towers do not use chromium-based water treatment chemicals.} |
| 044 | Woody Waste Facility Diesel Engine (EPA Tier 1 certified) (backup engine) |

SECTION I. FACILITY INFORMATION.

Subsection C. Applicable Requirements.

Based on the Title V air operation permit application renewal received on November 17, 2010, this facility is a major source of hazardous air pollutants (HAP). This facility is classified as a Prevention of Significant Deterioration (PSD) major facility. A summary of important applicable requirements is shown in the following table.

| Applicable Requirement | E.U. ID No(s). |
|--|---------------------------------------|
| Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) | 001, 002 & 019 010, 011, 012 & 014 |
| Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) | 001, 002, 019 010, 011, 012 & 014 |
| 40 CFR 60, Subpart A, New Stationary Source Performance Standards (NSPS) General Provisions | 001, 002 & 019 |
| 40 CFR 60, Subpart Cb, Emissions Guidelines (EG) and Compliance Times for Large Municipal Waste Combustors | 001, 002 & 019 |
| Rule 62-296.416, F.A.C., Waste-to-Energy Facilities | 001 & 002 |
| | |
| Rule 62-210.300, F.A.C., Permits Required | 004 & 008 |
| Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) | 004 & 008 |
| 40 CFR 60, Subpart A, New Stationary Source Performance Standards (NSPS) General Provisions | 004 & 008 |
| 40 CFR 60, Subpart WWW, Standards of Performance for Municipal Solid Waste Landfills | 004 & 008 |
| 40 CFR 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Asbestos | 004 & 008 |
| 40 CFR 63, Subpart A, General Provisions | 004 & 008 |
| 40 CFR 63, Subpart AAAA, National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills | 004 & 008 |
| | |
| 40 CFR 61, Subpart E, National Emission Standards for Hazardous Air Pollutants for Mercury | 010 & 011 |
| 40 CFR 64, Compliance Assurance Monitoring (CAM) | 010 & 011 |
| | |
| 40 CFR 63, Subpart A, General Provisions | 016, 017, 021 & 035-044 |
| 40 CFR 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines (RICE) | 016, 017, 021 & 035-044 |
| 40 CFR 60, Subpart A, General Provisions | 016, 021, 042 & 043 |
| 40 CFR 60, Subpart IIII, NSPS for Compression Ignition Internal Combustion Engines (CI-ICE) | 016, 021, 042 & 043 |

SECTION II. FACILITY-WIDE CONDITIONS.

The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV., Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Not federally enforceable. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) & 62-210.200 (Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

- a. Chemical or water application to unpaved road and unpaved yard and landfill areas;
- b. Paving and maintenance of roads, parking areas and yards;
- c. Landscaping or planting of vegetation;
- d. Confining abrasive blasting where possible and appropriate;
- e. Unpaved roads and active unpaved areas are sprayed with a water truck;
- f. Landfill areas that are closed are promptly re-vegetated;
- g. Ash is quenched with water prior to landfilling; and,
- h. Waste transfer trucks are tarped.

[Rule 62-296.320(4)(c), F.A.C. and proposed by applicant in Title V air operation permit renewal application received on November 17, 2010.]

SECTION II. FACILITY-WIDE CONDITIONS.

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements, for additional details.

- FW6. Annual Operating Report.** The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]
- FW7. Annual Emissions Fee Form and Fee.** The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: <http://www.dep.state.fl.us/air/emission/tvfee.htm>. [Rule 62-213.205, F.A.C.]
- FW8. Annual Statement of Compliance.** The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V air operation permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]
- FW9. Prevention of Accidental Releases (Section 112(r) of CAA).** If and when the facility becomes subject to 112(r), the permittee shall:
 - a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: 703/227-7650.
 - b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.[40 CFR 68.]

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 001, 002 & 019

The specific conditions in this section apply to the following emissions unit(s):

| E.U. ID No. | Brief Description |
|-------------|------------------------------------|
| 001 | Municipal Solid Waste Boiler No. 1 |
| 002 | Municipal Solid Waste Boiler No. 2 |
| 019 | Ash Building and Handling System |

Emissions Unit ID Nos. 001 and 002 are municipal solid waste (MSW) combustors which burn "refuse derived fuel" (RDF). These emissions units are designated as "Boiler No. 1" and "Boiler No. 2." Each unit consists of a refuse derived fuel combustor with auxiliary natural gas fired burners. The burners are used to fire the MSW combustors during startup, shutdown, and at other times when necessary and consistent with good combustion practices.

The facility is designed to process 2,000 tons per day (TPD) of mixed MSW with an annual throughput of 624,000 tons. The boilers were manufactured by Babcock & Wilcox, and each has a design rating of 427.5 MMBtu/hour heat input and a steam production rating of 324,000 lbs/hour. At a reference heating value of 5,700 Btu/lb, this is equivalent to 900 TPD, 75,000 lbs/hour or 816 megagrams/day of RDF per boiler. Short term capacity is restricted by steam production to 324,000 lbs/hour, which effectively limits heat input. The net design steam enthalpy for useful work is 1,158 Btu/lb.

Air pollutant emissions from the boilers are controlled by spray dryer absorbers (SDAs) and electrostatic precipitators (ESPs).

These two units exhaust to a common stack with two separate flues. The stack parameters for each flue are: height, 250 feet; diameter, 8 feet; exit temperature, 300 degrees F; and, actual stack gas flow rate, 277,055 acfm.

Boiler Nos. 1 and 2 began commercial operation on November 15, 1989.

Description: Units 1 and 2 are identical Babcock & Wilcox MSWC units that began commercial operation on November 15, 1989. The following descriptions include the changes being made in this permit.

Boiler Type: The boiler use a moving grate to burn the RDF fuel.

Fuel: RDF

Supplementary Fuel: Natural gas is used for startup, shutdown and during combustion of low Btu waste to maintain combustor temperature.

Capacity: The permitted capacity is 324,000 pounds per hour of steam (4-hour block average) based on a unit design capacity of 900 tons per day of RDF.

Generator Nameplate Rating: 62 Megawatts (MW).

Spray Dryer Absorber (SDA): Each unit uses lime injection to control acid gas emissions.

Fabric Filter System: Each unit uses a fabric filter system to control particulate matter (PM) emissions.

Combustion Control System and OFA System: Each unit optimizes furnace conditions with an automated control system and OFA system for proper combustion while minimizing carbon monoxide (CO), nitrogen oxides (NOx) and volatile organic compounds (VOC).

SNCR System: Each unit injects urea with an SNCR system to control NOx emissions.

ACI System: Each unit injects activated carbon to adsorb metal and dioxin/furan emissions, which are then collected by the fabric filter system.

Continuous Monitors: Each unit uses the following equipment to continuously monitor the following pollutants and parameters: continuous emissions monitoring systems (CEMS) for CO, carbon dioxide (CO₂), NOx and sulfur dioxide (SO₂); continuous opacity monitoring system (COMS) for opacity; and continuous monitoring systems (CMS) for the temperature of the flue gas stream at the fabric filter inlet, the steam production rate and urea injection rate.

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 001, 002 & 019

Stack Parameters: Units 1 and 2 each have a stack that is 250 feet tall with a diameter of 8 feet and are both surrounded by a single stack shell. The volumetric flow rates of each MSWC at permitted capacity are approximately 191,494 actual cubic feet per minute (acfm) and 116,274 dry standard cubic feet per minute (dscfm) @ 7% oxygen (O₂).

Exit Temperature: Approximately 310 °F, as measured downstream of the SDA.

Emissions Unit ID No. 019 is the Ash Building and Handling System. Fly ash from the **ESPs-fabric filter system** is wetted to control the dust and minimize fugitive emissions. Bottom ash from the RDF boilers is combined with the fly ash prior to going to the landfill (see Subsection III.B.). Emissions from the building are uncontrolled.

{Permitting notes: These emissions units are regulated under 40 CFR 60, Subpart Cb, Emissions Guidelines (EG) and Compliance Times for Large Municipal Waste Combustors (MWC) adopted and incorporated by reference in Rule 62-204.800(9)(b), F.A.C.; Rule 62-296.416, F.A.C., Waste-to-Energy Facilities; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD) [PSD-FL-108, as amended]; Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT); and, Florida Electrical Power Plant Site Certifications [PA84-20].}

Essential Potential to Emit (PTE) Parameters

- A.1. Hours of Operation.** These emissions units may operate continuously (8,760 hours/year). [Rule 62-210.200 (Definitions - Potential to Emit (PTE)), F.A.C.; and, Permit No. 0990234-015-AC/PSD-FL-108H.]
- A.2. Capacity.** The following maximum values (capacities) shall not be exceeded:
- 324,000 lbs/hr individual MWC unit steam production on a 4-hour block arithmetic average.
The MWC units shall not be loaded in excess of their maximum operating capacity, equivalent to 2,000 TPD of mixed MSW. See 40 CFR 60.31b of Appendix 40 CFR 60, Subpart Cb and 40 CFR 60.58b(j) of Appendix 40 CFR 60, Subpart Eb for additional restrictions on capacity. [Rules 62-4.160(2) & 62-210.200 (PTE), F.A.C.; 40 CFR 60.31b & 40 CFR 60.58b(j); and, Permit No. 0990234-015-AC/PSD-FL-108H.]
- A.3. Emissions Unit Operating Rate Limitation After Testing.** See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. See the “maximum demonstrated municipal waste combustor unit load” provisions of 40 CFR 60.34b(b) and 40 CFR 60.51b for additional restrictions on operating rate. [Rule 62-297.310(2), F.A.C.; and, 40 CFR 60.34b(b) & 40 CFR 60.51b.]
- A.4. MWCs - Fuels.** The open storage of solid waste outside of a building is prohibited. [PSD-FL-108A, specific condition 10.]
- A.5. MWCs - Methods of Operation - Fuels.**
- Allowable Fuels.**
 - The only fuels allowed to be burned in the MWCs are mixed municipal solid waste (MSW) from RDF, with natural gas as an auxiliary fuel. Other fuels or wastes, not specifically listed herein, shall not be burned without written prior approval from the Department. Fuels or wastes specifically authorized herein do not require prior Department approval before combustion.
 - The primary fuel for the facility is mixed municipal solid waste (MSW) from RDF, including the items and materials that fit within the definition of MSW contained in either 40 CFR 60.51b or Section 403.706(5), Florida Statutes (2010).
 - Unauthorized Fuels.** Subject to the limitations contained in this permit, the authorized fuels for the facility also include the other solid wastes that are not MSW, which are described in **d. - f.**, below. However, the facility
 - shall not burn:**
 - those materials that are prohibited by state or federal law;
 - those materials that are prohibited by this permit;
 - lead acid batteries;
 - hazardous waste;
 - nuclear waste;

SECTION III. EMISSIONS UNITS AND SPECIFIC CONDITIONS.

Subsection A. Emissions Units 001, 002 & 019

- (f) radioactive waste;
 - (g) sewage sludge;
 - (h) sewage sludge from sewage treatment plants ¹;
 - (i) explosives;
 - (j) beryllium-containing waste, as defined in 40 CFR 61, Subpart C. *{The U.S. EPA letter dated April 6, 2000 (see attached), on 40 CFR 61, Subpart C further addresses the applicability of this federal regulation with regard to beryllium-containing waste(s).}*
- (2) and shall not knowingly burn:
- (a) untreated biomedical waste from biomedical waste generators regulated pursuant to Chapter 64E-16, F.A.C., and from other similar generators (or sources). See the attached Appendix BW, Biomedical Waste Definitions, for definitions of what constitutes biomedical waste;
 - (b) segregated loads of biological waste.
- c. **Fuel Handling.** The fuel may be received either as a mixture or as a single-item stream (segregated load) of discarded materials. If the facility intends to use an authorized fuel that is segregated non-MSW material, the fuel shall be well mixed with MSW. For the purposes of this permit, a segregated load is defined to mean a container or truck that is almost completely or exclusively filled with a single item or homogeneous composition of waste material, as determined by visual observation.
- d. **Other Solid Waste.** Subject to the conditions and limitations contained in this permit, the following other solid waste may be used as fuel at the facility:
- (1) Confidential, proprietary or special documents (including but not limited to business records, lottery tickets, event tickets, coupons and microfilm);
 - (2) Contraband which is being destroyed at the request of appropriately authorized local, state or federal governmental agencies, provided that such material is not an explosive, a propellant, a hazardous waste, or otherwise prohibited at the facility. For the purposes of this section, contraband includes but is not limited to drugs, narcotics, fruits, vegetables, plants, counterfeit money, and counterfeit consumer goods;
 - (3) Wood pallets, clean wood, and land clearing debris;
 - (4) Packaging materials and containers;
 - (5) Clothing, natural and synthetic fibers, fabric remnants, and similar debris, including but not limited to aprons and gloves; or
 - (6) Rugs, carpets, and floor coverings, but not asbestos-containing materials or polyethylene or polyurethane vinyl floor coverings.
- e. **Waste Tires.** Subject to the conditions and limitations contained in this permit, waste tires may be used as fuel at the facility. The total quantity of waste tires received as segregated loads and burned at the facility shall not exceed 3%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined on a calendar month basis.
- f. **Non-MSW Material.** Subject to the conditions and limitations contained in this permit, the following other solid waste materials may be used as fuel at the facility (i.e., the following are authorized fuels that are non-MSW material). The total quantity of the following non-MSW material received as segregated loads and burned at the facility shall not exceed 5%, by weight, of the facility's total fuel. Compliance with this limitation shall be determined on a calendar month basis.
- (1) Construction and demolition debris.
 - (2) Oil spill debris from aquatic, coastal, estuarine or river environments. Such items or materials include but are not limited to rags, wipes, and absorbents.
 - (3) Items suitable for human, plant or domesticated animal use, consumption or application where the item's shelf-life has expired or the generator wishes to remove the items from the market. Such items or materials include but are not limited to off-specification or expired consumer products, pharmaceuticals, medications, health and personal care products, cosmetics, foodstuffs, nutritional supplements, returned goods, and controlled substances.

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- (4) Consumer-packaged products intended for human or domesticated animal use or application but not consumption. Such items or materials include but are not limited to carpet cleaners, household or bathroom cleaners, polishes, waxes and detergents.
- (5) Waste materials that:
 - (a) are generated in the manufacture of items in categories f.(3) or f.(4), above and are functionally or commercially useless (expired, rejected or spent); or
 - (b) are not yet formed or packaged for commercial distribution. Such items or materials must be substantially similar to other items or materials routinely found in MSW.
- (6) Waste materials that contain oil from:
 - (a) the routine cleanup of industrial or commercial establishments and machinery; or
 - (b) spills of virgin or used petroleum products. Such items or materials include but are not limited to rags, wipes, and absorbents.
- (7) Used oil and used oil filters. Used oil containing a polychlorinated biphenyls (PCB) concentration equal or greater than 50 parts per million (ppm) shall not be burned, pursuant to the limitations of 40 CFR 761.20(e).
- (8) Waste materials generated by manufacturing, industrial or agricultural activities, provided that these items or materials are substantially similar to items or materials that are found routinely in MSW, subject to written prior approval of the Department.

[Rules 62-4.070(1), (3), 62-213.410 & 62-213.440, F.A.C.; and, ¹ PSD-FL-108A, specific condition 11.]

{Permitting note: At RDF plants, the 3% (or 5%) restriction applies to the municipal solid waste received. On-site processing of material at the facility is not included in this restriction. Exceedance of this percentage requires prior department approval.}

A.6. Auxiliary Burners - Methods of Operation - Fuels. Auxiliary burners for each MWC shall be fired only with natural gas. Natural gas may be used as a supplemental fuel during startups, shutdowns, and at other times when necessary and consistent with good combustion practices. [Rules 62-4.160(2), 62-210.200 (PTE), 62-213.410, & 62-213.440, F.A.C.; and, PSD-FL-108A.]

A.7. Auxiliary Gas Burner Operations.

- a. During boiler startup, the auxiliary gas burners shall be operating at their maximum capacity prior to the introduction of RDF to the boilers, and shall remain in operation until the lime spray dryer absorbers and particulate matter emissions control device (**ESP-fabric filter system**) are fully operational.
- b. During normal, non-emergency boiler shutdown, the auxiliary gas burners shall be operated at their maximum capacity until all RDF has been combusted.

[Rules 62-4.160(2), 62-210.200 (PTE), 62-213.410, & 62-213.440, F.A.C.; **0992034-015-AC/PSD-FL-108H**; and, PSD-FL-108A, specific conditions 7. & 8.]

Air Pollution Control Technologies and Measures

A.8. Carbon Usage Rate. The carbon injection rate operating standard and monitoring requirements set forth in 40 CFR 60.58b(m) of 40 CFR 60, Subpart Eb, incorporated by reference in Rule 62-204.800, F.A.C., shall apply. See Appendix 40 CFR 60, Subpart Eb. [Rule 62-296.416(5), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging times for Specific Conditions **A.9. - A.19.** are based on the specified averaging time of the applicable test method.

{Permitting note: The May 10, 2006 amendments to 40 CFR 60 Subpart Cb changed some of the emission standards and limitations for Unit Nos. 1 & 2. Five (5) air pollutant standards/limitations were lowered under the amendments: PM, cadmium (Cd), Hg, Pb and dioxin/furan (D/F).}

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Stack Emissions

- A.9. Particulate Matter.** The emission limit for particulate matter (PM) contained in the gases discharged to the atmosphere is 25 milligrams (mg) per dry standard cubic meter, corrected to 7 percent oxygen. [Rule 62-204.800(9)(b)3.a., F.A.C.; 40 CFR 60.33b(a)(1)(i); and, PSD-FL-108A, specific condition 3.a.]
- A.10. Opacity.** As determined by the continuous opacity monitoring system (COMS) or EPA Method 9, the emission limit for opacity exhibited by the gases discharged to the atmosphere is 10 percent (6-minute average). [Rule 62-204.800(9)(b)3.b., F.A.C.; 40 CFR 60.33b(a)(1)(iii); and, PSD-FL-108A, specific condition 3.k. & Permit No. 0990234-015-AC/PSD-FL-108H, specific condition 17.e.]
- A.11. Cadmium.** The emission limit for cadmium (Cd) contained in the gases discharged to the atmosphere is 35 micrograms (ug) per dry standard cubic meter, corrected to 7 percent oxygen. [Rule 62-204.800(9)(b)3.c., F.A.C. and 40 CFR 60.33b(a)(2)(i).]
- A.12. Mercury.** The emission limit for mercury (Hg) contained in the gases discharged to the atmosphere is 50 micrograms 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. [Rule 62-204.800(9)(b)3.d., F.A.C.; 40 CFR 60.33b(a)(3); and, PSD-FL-108A, specific condition 3.e.]
- A.13. Lead.** The emission limit for lead (Pb) contained in the gases discharged to the atmosphere is 400 micrograms per dry standard cubic meter, corrected to 7 percent oxygen. [Rule 62-204.800(9)(b)3.c., F.A.C.; 40 CFR 60.33b(a)(4); and, PSD-FL-108A, specific condition 3.d.]
- A.14. Sulfur Dioxide.** As determined by the continuous emissions monitoring system (CEMS), the emission limit for sulfur dioxide (SO₂) contained in the gases discharged to the atmosphere is 29 parts per million by volume (ppmv) 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. [Rule 62-204.800(9)(b)3.e., F.A.C.; 40 CFR 60.33b(b)(3)(i); and, PSD-FL-108A, specific condition 3.i. & Permit No. 0990234-015-AC/PSD-FL-108H, specific condition 17.d.]
- A.15. Hydrogen Chloride.** The emission limit for hydrogen chloride (HCl) contained in the gases discharged to the atmosphere is 25 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. [Rule 62-204.800(9)(b)3.f., F.A.C.; 40 CFR 60.33b(b)(3)(ii); and, PSD-FL-108A, specific condition 3.j.]
- A.16. Dioxin/Furan.** The emission limit for dioxin/furan (D/F) contained in the gases discharged to the atmosphere from designated facilities that **do not** employ an electrostatic precipitator-based emission control system is **35 30** nanograms per dry standard cubic meter (total mass), corrected to 7 percent oxygen. [Rule 62-204.800(9)(b)3.g., F.A.C.; 40 CFR 60.33b(c)(1)(iii); and, **PSD-FL-108A, specific condition 3.i. 0990234-021-AC/PSD-FL-108J**]
- A.17. Nitrogen Oxides.** As determined by the CEMS, the emission limit for nitrogen oxides (NO_x) contained in the gases discharged to the atmosphere from a refuse derived fuel type municipal waste combustor technology is 250 parts per million by volume, corrected to 7 percent oxygen, dry basis. Compliance with this emission limit is based on the 24-hour daily arithmetic average of the hourly emission concentrations using continuous emission monitoring system outlet data. Emissions averaging pursuant to 40 CFR 60.33b(d)(1) shall be allowed. 40 CFR 60.33b(d)(2) shall not apply. [Rule 62-204.800(9)(b)3.h., F.A.C.; 40 CFR 60.33b(d); and, PSD-FL-108A, specific condition 3.b. & Permit No. 0990234-015-AC/PSD-FL-108H, specific condition 17.d.]
- A.18. Carbon Monoxide.** As determined by the CEMS:
- a. the emission limit for carbon monoxide (CO) contained in the gases discharged to the atmosphere from a refuse derived fuel stoker type municipal waste combustor technology is 200 parts per million by volume

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(ppmvd), measured at the combustor outlet in conjunction with a measurement of oxygen concentration, corrected to 7 percent oxygen, dry basis, and calculated on a 24-hour block average. Calculated as an arithmetic average. [Rule 62-204.800(9)(b)3.i., F.A.C.; 40 CFR 60.34b(a); and, Permit No. 0990234-015-AC/PSD-FL-108H, specific condition 17.d.]

- b. CO emissions shall not exceed 400 ppmvd, corrected to 7 percent oxygen, dry basis, and calculated on a 4-hour block average. [Permit No. 0990234-015-AC/PSD-FL-108H, specific conditions 3.c. & 17.d.]

A.19. Volatile Organic Compounds. Volatile organic compound (VOC) emissions shall not exceed 1.6×10^{-2} lb/MMBtu. [PSD-FL-108A, specific condition 3.h.]

Fugitive Ash Emissions

A.20. (This condition only applies to the ash conveying systems of E.U. ID No. 019.) Fugitive Ash Emissions.

- a. No owner or operator of an affected facility shall cause to be discharged to the atmosphere visible emissions of combustion ash from an ash conveying system (including conveyor transfer points) in excess of 5 percent of the observation period (i.e., 9 minutes per 3-hour period), as determined by EPA Reference Method 22 observations as specified in 40 CFR 60.58b(k), except as provided in paragraphs b. and c.
- b. The emission limit specified in paragraph a. does not cover visible emissions discharged inside buildings or enclosures of ash conveying systems; however, the emission limit specified in paragraph a. does cover visible emissions discharged to the atmosphere from buildings or enclosures of ash conveying systems.
- c. The provisions of paragraph a. do not apply during maintenance and repair of ash conveying systems. [Rule 62-204.800(9)(b)6., F.A.C.; and, 40 CFR 60.36b and 40 CFR 60.55b.]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C., cannot vary any requirement of an EG, NSPS or NESHAP provision.

A.21. Excess Emissions Allowed - Startup, Shutdown or Malfunction. Excess emissions resulting from startup, shutdown or malfunction shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. The Department authorizes three hours per occurrence in any 24-hour period for these emissions units. A malfunction means any unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. [Rules 62-210.700(1) & (5), F.A.C. and PSD-FL-108A, specific condition 15.]

A.22. Excess Emissions Prohibited. 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 startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Continuous Monitoring Requirements

{Permitting note: The following continuous monitors are installed on these emissions units: steam flow, urea injection rate, ACI rate, inlet temperature to ESP the fabric filter, opacity, SO₂, NO_x, CO and carbon dioxide (CO₂).}

A.23.1. Steam Flow Meter. The owner or operator shall calibrate, maintain, and operate a steam flow meter or a feedwater flow meter; to measure steam (or feedwater) flow in kilograms per hour (or lbs/hour) on a continuous basis; and record the output of the monitor. Steam (or feedwater) flow shall be calculated in 4-hour block arithmetic averages. [Rule 62-213.440, F.A.C.; 40 CFR 60.34b, 40 CFR 60.53b & 40 CFR 60.58b(i)(6); and, PSD-FL-108A.]

A.23.2. Urea Injection Rate: The permittee shall calibrate, operate and maintain a CMS to continuously monitor and record the urea injection rate of each SNCR system. [0990234-015-AC/PSD-FL-108H]

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A.23.3. ACI Rate: The permittee shall calibrate, operate and maintain a CMS to continuously monitor and record the ACI injection rate of each ACI system. [0990234-015-AC/PSD-FL-108H]

A.24. Inlet Temperature to Particulate Matter Control Device (ESP). The owner or operator shall calibrate, maintain, and operate a device for measuring on a continuous basis the temperature of the flue gas stream at the inlet to each particulate matter control device utilized. Temperature shall be calculated in 4-hour block arithmetic averages. [Rule 62-213.440, F.A.C.; 40 CFR 60.34b, 40 CFR 60.53b & 40 CFR 60.58b(i)(7); and, PSD-FL-108A, 0990234-015-AC/PSD-FL-108H]

A.25. Continuous Emissions Monitoring Systems (CEMS) Required. The owner or operator shall calibrate, operate and maintain continuous emissions monitoring systems (CEMS) for monitoring opacity, sulfur dioxide (SO₂), nitrogen oxides (NO_x) and carbon monoxide (CO). [Rule 62-213.440, F.A.C.; and, 40 CFR 60.38b; 40 CFR 60.58b(c)(8) (opacity); 40 CFR 60.58b(e)(5) (SO₂); 40 CFR 60.58b(h)(4) (NO_x) & 40 CFR 60.58b(i)(3) (CO).]

A.26. Oxygen (O₂) or Carbon Dioxide (CO₂) CEMS. The owner or operator shall calibrate, maintain, and operate a continuous emission monitoring system (CEMS) for measuring the oxygen or carbon dioxide content of the flue gas at each location where carbon monoxide, sulfur dioxide, or nitrogen oxides emissions are monitored and record the output of the system. [Rule 62-213.440, F.A.C. and 40 CFR 60.38b, & 40 CFR 60.58b(b).]

Test Methods and Procedures

{Permitting note: Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.27. Test Methods. Required tests shall be performed in accordance with the following reference methods:

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| Method(s) | Description of Method(s) and Comment(s) |
|------------------------------------|--|
| EPA Methods 1-4 | Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content |
| EPA Methods 5 | Methods for Determining PM Emissions |
| EPA Methods 6, 6A, 6C or 8 | Methods for Determining SO ₂ Emissions |
| EPA Method 7, 7A, 7B, 7C, 7D or 7E | Determination of NO _x Emissions |
| EPA Method 9 | Visual Determination of the Opacity of Emissions (VE) |
| EPA Method 10, 10A or 10B | Determination of CO Emissions |
| EPA Method 12 | Determination of Pb Emissions |
| EPA Method 19 | Determination of "F" factors used in determining heating value of RDF |
| EPA Method 22 | Visual Determination of Fugitive Emissions from Material Sources |
| EPA Method 23 | Measurement of D/F Emissions. Authorized to omit methylene chloride rinse. ¹ |
| EPA Method 25 or 25A | Determination of VOC Emissions |
| EPA Method 26 or 26A | Determination of HCl Emissions from Stationary Sources. Changes were approved to the EPA Method 26 testing methodology. ² |
| EPA Method 29 | Determination of Metal (e.g., Cd, Hg and Pb) Emissions from Stationary Sources |
| EPA Method 101A | Determination of Hg Emissions |

The above methods are described in Chapter 62-297, F.A.C. and/or 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Chapter 62-297, F.A.C.; Rule 62-204.800(9)(b)7., F.A.C.; PSD-FL-108A; ¹ Appendix ATP, U.S. EPA Alternative Test Procedure Approval dated June 3, 2004; and, ² Permit No. 0990234-019-AC/PSD-FL-108I.]

A.28. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.29. Annual Compliance Test. The owner or operator shall conduct a performance test for PM, opacity, Cd, Hg, Pb and D/F emissions on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test; and must complete five performance tests in each 5-year calendar period). The owner or operator shall conduct a performance test for HCl emissions on an annual basis. [Rules 62-297.310(7) & 62-204.800(9)(b)7., F.A.C. and PSD-FL-108A, specific condition 4.]

A.30. Annual Compliance Test. During each federal fiscal year (October 1st to September 30th), Emissions Unit ID Nos. 001 and 002 shall be tested to demonstrate compliance with the emission limitations and standards for VOC. [Rule 62-297.310(7), F.A.C. and PSD-FL-108A, specific condition 4.] VOC Emission Testing. Compliance with the VOC limit shall be demonstrated by compliance with the Carbon Monoxide limit in lieu of stack testing, but should the Department feel the VOC limit is not being met, a special compliance test could be required. [0990234-021-AC/PSD-FL-108J]

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- A.31. Dioxins/Furans.** The alternative performance testing schedule for dioxins/furans (D/F) specified in 40 CFR 60.58b(g)(5)(iii) (See Appendix 40 CFR 60, Subpart Eb) shall apply to municipal waste combustor plants that achieve a dioxin/furan emission level less than or equal to 15 nanograms per dry standard cubic meter, corrected to 7 percent oxygen. [Rule 62-204.800(9)(b)7.b, F.A.C.]
- A.32. HCl Emission Testing.** EPA Method 26 shall be used for the determination of hydrochloric acid concentration or other methods approved by DEP and EPA. The permittee may modify the EPA Method 26 sampling train as follows: full-size (Greenburg-Smith design) impingers may be used in lieu of midjet impingers; and, the two sodium hydroxide (NaOH) impingers may be replaced with one empty impinger. [Permit No. 0990234-019-AC/PSD-FL-108I, specific condition 4.i.]
- A.33. Mercury Testing Frequency.** The Department's Order Granting Variance dated August 25, 1997, is a part of this permit. The variance allows the facility to test mercury emissions annually provided each future annual test demonstrates compliance. The order contains additional terms. If compliance is not demonstrated by each annual test, the Department retains the right to reinstate quarterly testing. The variance does not apply to any other new or existing state or federal rule which may require more frequent mercury testing. [Rule 62-296.416(3)(a)3., F.A.C.; and, Order Granting Variance dated August 25, 1997.]
{Permitting note: 40 CFR 60, Subpart Cb requires annual Hg testing.}
- A.34. RDF Analysis.** During compliance stack tests, the RDF shall be analyzed by at least two separate labs, approved by the Department, using split samples for the Btu and moisture contents. [PSD-FL-108A, specific condition 12.]

Recordkeeping and Reporting Requirements

- A.35. Reporting Schedule.** The following reports shall be submitted to the Compliance Authority:

| Report | Reporting Deadlines | Related Conditions |
|--|--|---|
| Excess Emissions from Malfunctions, if requested by the Compliance Authority | Every 3 months (quarter) | A.36. |
| NSPS Excess Emissions and Monitoring System Performance | Every 6 months (semi-annual), except when more frequent reporting is specifically required | A.46. |
| EG Cb (Eb) Annual Report | Every 6 months (semi-annual) | A.44 & 45. Appendix Cb/Appendix Eb - 40 CFR 60.59b(g) |
| EG Cb (Eb) Semi-Annual Report | Every 6 months (semi-annual) | A.44 & 45. Appendix Cb/Appendix Eb - 40 CFR 60.59b(h) |

[Rule 62-210.700(6), F.A.C.; 40 CFR 60, Subparts A, Cb & Eb.]

- A.36. Excess Emissions from Malfunctions.** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Compliance Authority. [Rule 62-210.700(6), F.A.C.]
- A.37. Other Reporting Requirements.** See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements. [Rule 62-213.440, F.A.C.]
- A.38. Records of Non-MSW.** The facility owner or operator shall prepare and maintain records concerning the description and quantities of all segregated loads of non-MSW material which are received and used as fuel at the facility, and subject to a percentage weight limitation (see Specific Conditions **A.5.e.** and **A.5.f.**). The

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following records shall be prepared and maintained to demonstrate compliance with the segregated non-MSW percentage limitations:

- a. *Segregated Loads of non-MSW Materials.* Each segregated load of non-MSW materials, that is subject to the percentage weight limitations (see Specific Conditions A.5.e. and A.5.f.), which is received for processing shall be documented as to the description and weight of the waste. The weight of all waste materials received for processing shall be measured using the facility truck scale and recorded.
- b. *Waste Tires.* Each day the total weight of segregated tires received shall be computed, and the daily total shall be added to the sum of the daily totals from the previous days in the current calendar month. At the end of each calendar month, the resultant monthly total weight of tires shall be divided by the total weight of all waste materials received in the same calendar month, and the resultant number shall be multiplied by 100 to express the ratio in percentage terms. The percentage computed shall be compared to the 3% limitation.
- c. *Non-MSW Material.* Each day the total weight of segregated non-MSW materials received that are subject to the 5% restriction shall be computed, and the daily total shall be added to the sum of the daily totals from the previous days in the current calendar month. At the end of each calendar month, the resultant monthly total weight of segregated non-MSW materials subject to the 5% restriction shall be divided by the total weight of all waste materials received in the same calendar month, and the resultant number shall be multiplied by 100 to express the ratio in percentage terms. The percentage computed shall be compared to the 5% limitation.

[Rules 62-4.070(1), (3), 62-213.410 & 62-213.440, F.A.C.]

- A.39. Daily Waste Logs Required.** The permittee shall maintain a daily log of the municipal solid waste received. Such a log must record, at a minimum, the amount of waste, the time, and the type of waste received. [PSD-FL-108A, specific condition 18. and Rule 62-213.440, F.A.C.]
- A.40. Reporting and Recordkeeping.** The reporting and recordkeeping requirements applicable to each municipal waste combustor unit subject to Rule 62-204.800(9)(b), F.A.C., shall be the same as set forth in 40 CFR 60.59b, except for the siting requirements under 40 CFR 60.59b(a), (b)(5) and (d)(11). See Appendix 40 CFR 60, Subpart Eb. [Rule 62-204.800(9)(b)7.b, F.A.C.]

Operator Practices, Training and Certification

- A.41. Operating Practices.** The owner or operator shall comply with the operating practices as set forth in 40 CFR 60.53b(b) and (c). [Rule 62-204.800(9)(b)4., F.A.C.; and, 40 CFR 60.34b & 40 CFR 60.53b.]
- A.42. Operator Training and Certification.** The owner or operator shall comply with the operator training and certification requirements of 40 CFR 60.54b. Compliance with these requirements shall be conducted according to the schedule specified in 40 CFR 60.39b(c)(4). [Rule 62-204.800(9)(b)5., F.A.C.; and, 40 CFR 60.35b & 40 CFR 60.54b.]

EG 40 CFR 60, Subpart Cb Requirements

- A.43. EG Requirements - General Applicability and Definitions.** These emissions units shall comply with all applicable requirements of 40 CFR 60, Emission Guidelines and Compliance Times which have been adopted by reference in Rule 62-204.800(9), F.A.C., except that the term "Administrator," when used in any provision of 40 CFR 60 that is delegated to the Department by the U.S. Environmental Protection Agency, shall mean the Secretary or the Secretary's designee. [Rule 62-204.800(9)(a), F.A.C.]
- A.44. EG Requirements - Subpart Cb.** These emissions units shall comply with all applicable requirements of 40 CFR 60, Subpart Cb, Emissions Guidelines (EG) and Compliance Times for Large Municipal Waste Combustors, which have been adopted and incorporated by reference in Rule 62-204.800(9), F.A.C. These emissions units shall comply with Appendix 40 CFR 60 Subpart Cb included with this permit. [Rule 62-204.800(9)(b), F.A.C.]

NSPS 40 CFR 60, Subpart A & Eb Requirements

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{Permitting notes: The EG 40 CFR 60, Subpart Cb, cross references conditions (applicable requirements) that are contained in the NSPS 40 CFR 60, Subparts A and Eb.}

- A.45. NSPS Requirements - Subpart Eb.** Except as otherwise provided in this permit, these emissions units shall comply with all applicable provisions of 40 CFR 60, Subpart Eb, Large Municipal Waste Combustors, adopted and incorporated by reference in Rule 62-204.800(8)(b), F.A.C.; except that the Secretary is not the Administrator for purposes of the authorities cited at 40 CFR 60.50b(n). These emissions units shall comply with all applicable provisions of Appendix 40 CFR 60 Subpart Eb included with this permit. [Rule 62-204.800(8)(b)7., F.A.C.]
- A.46. NSPS Requirements - Subpart A.** This emissions unit shall comply with all applicable requirements of 40 CFR 60, Subpart A, General Provisions, including:
40 CFR 60.7, Notification and Recordkeeping
40 CFR 60.8, Performance Tests
40 CFR 60.11, Compliance with Standards and Maintenance Requirements
40 CFR 60.12, Circumvention
40 CFR 60.13, Monitoring Requirements
40 CFR 60.19, General Notification and Reporting Requirements,
which have been adopted by reference in Rule 62-204.800(8)(d), F.A.C.; except that the Secretary is not the Administrator for purposes of 40 CFR 60.4, 40 CFR 60.8(b)(2) and (3), 40 CFR 60.11(e)(7) and (8), 40 CFR 60.13(g), (i) and (j)(2), and 40 CFR 60.16. This emissions unit shall comply with all applicable provisions of Appendix 40 CFR 60 Subpart A included with this permit. [Rule 62-204.800(8)(d), F.A.C.]

Other Requirements

- A.47. Acid Rain Part Application.** For any unit which is a solid waste incinerator, burning less than 20 percent fossil fuel as described in 40 CFR 72.6(b)(7), adopted and incorporated by reference at Rule 62-204.800, F.A.C., the designated representative of the source containing the unit shall submit a complete Acid Rain Part application governing such unit to the Department before March 1st of the year following the three calendar year period in which the incinerator consumed 20 percent or more fossil fuel on a British thermal unit (BTU) basis. [Rule 62-214.320(1), F.A.C.]

APPENDIX I

LIST OF INSIGNIFICANT EMISSIONS UNITS AND/OR ACTIVITIES

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, or that meet the criteria specified in Rule 62-210.300(3)(b)1., F.A.C., Generic Emissions Unit Exemption, are exempt from the permitting requirements of Chapters 62-210, 62-212 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rules 62-210.300(3)(a) and (b)1., F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. Fly Ash Storage Silos.
2. Lime Storage Silos.
3. Ash Treatment Chemical Storage Silo.
4. Composting Facility.
5. Ferrous Processing Facility.
6. Materials Recycling Facility.
7. Woody Waste Recycling Facility - Fugitive Dust from Processing and Grinder.
8. BPF Cooling Tower Trains #1 and #2 {The cooling towers do not use chromium-based water treatment chemicals}.
9. Biosolids Pelletization Facility (BPF) Purge Valves (2).
10. Laboratory Hood.
11. Numerous other non-road engines (portable) located at the facility; these engines are not regulated under 40 CFR 63, Subpart ZZZZ: ~73 consisting of welders, pressure washers, general purpose engines, emergency generators, light carts, pumps and blowers.
12. Any other emissions unit or activity that:
 - a. Is exempted from the requirement to obtain an air construction permit as cited in Rule 62-213.430(6)(a), F.A.C..

And meets all of the following criteria pursuant to Rule 62-213.430(6)(b), F.A.C.:

 - b. Is not subject to a unit-specific applicable requirement.
 - c. In combination with other units and activities proposed as insignificant, would not cause the facility to exceed any major source threshold(s) as defined by Rule 62-213.420(3)(c)1., F.A.C. unless acknowledged in a permit application.
 - d. Would neither emit nor have the potential to emit:
 - i. 500 pounds per year of lead and lead compounds expressed as lead;
 - ii. 1,000 pounds per year or more of any hazardous air pollutant;
 - iii. 2,500 pounds per year or more of total hazardous air pollutants; or
 - iv. 5.0 tons per year or more of any other regulated pollutant.
13. **Activated Carbon Silo**

Table 1, Summary of Air Pollutant Standards and Terms

Solid Waste Authority of Palm Beach County
North County Regional Resource Recovery Facility

Draft/Proposed Permit No. 0990234-022-AV
Facility ID No. 0990234

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

| E.U. ID No. | Brief Description |
|-------------|------------------------------------|
| 001 | Municipal Solid Waste Boiler No. 1 |
| 002 | Municipal Solid Waste Boiler No. 2 |
| 019 | Ash Building and Handling System |

The following apply to each individual emissions unit

| Pollutant Name or Parameter | Allowable Emissions | | | Equivalent Emissions* | | Regulatory Citation(s) | See permit condition(s) |
|---------------------------------|---------------------|------------|--|-----------------------|----------|--|-------------------------|
| | Fuel(s) | Hours/Year | Standard(s) | lbs./hour | TPY | | |
| PM/PM10 | MSW | 8,760 | 25 mg/dscm, corrected to 7% O ₂ | 11.06 | 48.47 | 40 CFR 60.33b(a)(1)(i) and PSD-FL-108A | III.A.9 |
| VE (opacity) | MSW | 8,760 | 10%, 6-minute average | N/A | N/A | 40 CFR 60.33b(a)(1)(iii) and PSD-FL-108A | III.A.10 |
| Cd | MSW | 8,760 | 35 ug/dscm, corrected to 7% O ₂ | 0.02 | 0.09 | 40 CFR 60.33b(a)(2)(i) | III.A.11 |
| Hg | MSW | 8,760 | 50 ug/dscm, corrected to 7% O ₂ or | 0.02 | 0.1 | 40 CFR 60.33b(a)(3) and PSD-FL-108A | III.A.12 |
| | | 8,760 | 85% reduction by weight ¹ | | | 40 CFR 60.33b(a)(3) and PSD-FL-108A | III.A.12 |
| Pb | MSW | 8,760 | 400 ug/dscm, corrected to 7% O ₂ | 0.18 | 0.78 | 40 CFR 60.33b(a)(4) and PSD-FL-108A | III.A.13 |
| | | 8,760 | 29 ppmvd, corrected to 7% O ₂ or | 34.16 | 149.76 | 40 CFR 60.33b(b)(3)(i) and PSD-FL-108A | III.A.14 |
| SO ₂ | MSW | 8,760 | 75% reduction by weight or volume, 24-hour daily geometric mean ¹ | | | 40 CFR 60.33b(b)(3)(i) and PSD-FL-108A | III.A.14 |
| | | 8,760 | 25 ppmvd, corrected to 7% O ₂ or | 16.76 | 73.47 | 40 CFR 60.33b(b)(3)(ii) and PSD-FL-108A | III.A.15 |
| HCl | MSW | 8,760 | 95% reduction by weight or volume ¹ | | | 40 CFR 60.33b(b)(3)(ii) and PSD-FL-108A | III.A.15 |
| | | 8,760 | 30 ng/dscm, corrected to 7% O ₂ | 1.33E-05 | 5.83E-05 | 40 CFR 60.33b(c)(1)(iii) and PSD-FL-108J | III.A.16 |
| Dioxin/Furan | MSW | 8,760 | 250 ppmvd, corrected to 7% O ₂ | 211.49 | 927.15 | 40 CFR 60.33b(d) and PSD-FL-108A | III.A.17 |
| NOx | MSW | 8,760 | 200 ppmvd, corrected to 7% O ₂ , 24-hour block avg. and | 103.1 | 451.54 | 40 CFR 60.33b(b)(3)(ii) and PSD-FL-108A | III.A.18.a |
| | | 8,760 | 400 ppmvd, corrected to 7% O ₂ , 4-hour block avg. | - | - | 40 CFR 60.33b(b)(3)(ii) and PSD-FL-108H | III.A.18.b |
| VOC | MSW | 8,760 | 1.6E-02 lb/MMBtu | 6.84 | 29.96 | PSD-FL-108A | III.A.19 |
| VE - fugitive ash emissions | | 8,760 | 5% of the observation period (i.e., 9 minutes per 3-hour period) | N/A | N/A | 40 CFR 60.36b | III.A.20 |
| O ₂ /CO ₂ | MSW | 8,760 | N/A | N/A | N/A | 40 CFR 60.38b | III.A.26 |

Notes:

* "N/A" represents not applicable.

* The "Equivalent Emissions" listed are for informational purposes only. The "lbs./hour" equivalent emission values are based on a stack gas flow rate of 139,792 dscfm.

¹ Whichever is least stringent.

Table 1, Summary of Air Pollutant Standards and Terms

Solid Waste Authority of Palm Beach County
 North County Regional Resource Recovery Facility

Draft/Proposed Permit No. 0990234-022-AV
 Facility ID No. 0990234

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

| E.U. ID No. | Brief Description |
|-------------|---|
| 004 | Class III Landfill and Flare (1,800 scfm, manufactured by LFG Specialties, model number PCF82018) |
| 008 | Class I Landfill and Flare (3,500 scfm, manufactured by Shaw LFG Specialties, model number CF1238110) |

The following apply to the flares

| Pollutant Name or Parameter | | | Allowable Emissions | | | Equivalent Emissions* | | Regulatory Citation(s) | See permit condition(s) |
|--|---------|------------|---|-----------|-----|-----------------------|-----|--|--|
| | Fuel(s) | Hours/Year | Standard(s) | lbs./hour | TPY | lbs./hour | TPY | | |
| 004 landfill gas flow rate | | 8,760 | ≤ 1,800 scfm of landfill gas (Class III flare) | | | | | Permit No. 0990234-002-AC/PSD FL-108D | III.B.2. |
| 008 landfill gas flow rate | | 8,760 | ≤ 3,500 scfm of landfill gas (Class I flare) | | | | | " | " |
| 004 & 008 landfill gas sulfur content | | | - | - | - | | | - | - |
| 004 & 008 landfill gas net heating value | | | | - | - | | | 40 CFR 60.18(c)(3) | Appendix 40 CFR 60 Subpart A |
| 004 & 008 actual flare gas exit velocity | | | v, (see 40 CFR 60.18(c)(4) & (5)) | - | - | | | Permit No. 0990234-002-AC/PSD FL-108D & 40 CFR 60.18(c)(4) & (5) | III.B.7. & 8. (see Appendix 40 CFR 60 Subpart A) |
| 004 & 008 VE | | | no VE, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours | - | - | | | 40 CFR 60.18(c)(1) | III.B.10. |

Notes:
 * The "Equivalent Emissions" listed are for informational purposes only.

Table 1, Summary of Air Pollutant Standards and Terms

| Solid Waste Authority of Palm Beach County North County Regional Resource Recovery Facility | | | Draft/Proposed Permit No. 0990234-022-AV Facility ID No. 0990234 | | | | | | |
|---|-------------------------|--|---|-----------|-------|-----------------------|-----------|---|-------------------------|
| This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. | | | | | | | | | |
| E.U. ID No. | | Brief Description | | | | | | | |
| 010 | | BPF Sludge Dryer Train #1 | | | | | | | |
| 011 | | BPF Sludge Dryer Train #2 | | | | | | | |
| 012 | | BPF Recycle Material Bin and Pellet Storage Silo for Sludge Dryer Train #1 | | | | | | | |
| 014 | | BPF Recycle Material Bin and Pellet Storage Silo for Sludge Dryer Train #2 | | | | | | | |
| Pollutant Name or Parameter | Fuel(s) | Hours/Year | Allowable Emissions | | | Equivalent Emissions* | | Regulatory Citation(s) | See permit condition(s) |
| | | | Standard(s) | lbs./hour | TPY | lbs./hour | TPY | | |
| 010 NOx | natural or landfill gas | 8,760 | - | 5.60 | 24.55 | | | BACT & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.9. |
| 011 NOx | " | " | - | 5.60 | 24.55 | | | " | " |
| 010 PM/PM ₁₀ | " | " | - | 2.42 | 10.6 | | | BACT & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.10. |
| 010 VE | " | " | 5% opacity, except 20% opacity is allowed for up to 3 minutes in 1 hour | - | - | | | " | III.C.11. |
| 011 PM/PM ₁₀ | " | " | - | 2.42 | 10.6 | | | BACT & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.10. |
| 011 VE | " | " | 5% opacity, except 20% opacity is allowed for up to 3 minutes in 1 hour | - | - | | | " | III.C.11. |
| 012 PM/PM ₁₀ | " | " | 0.010 gr/dscf | - | - | | 0.6 | BACT & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.12. |
| 012 VE | " | " | 5% opacity | - | - | | | " | III.C.13. |
| 014 PM/PM ₁₀ | " | " | 0.010 gr/dscf | - | - | | 0.6 | BACT & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.12. |
| 014 VE | " | " | 5% opacity | - | - | | | " | III.C.13. |
| 010 SO ₂ | " | " | - | 4.45 | 19.5 | | | Rule 62-212.400(12), F.A.C. & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.14. |
| 011 SO ₂ | " | " | - | 4.45 | 19.5 | | | " | " |
| 010 CO | " | " | - | 3.37 | 14.75 | | | Rule 62-212.400(12), F.A.C. & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.15. |
| 011 CO | " | " | - | 3.37 | 14.75 | | | " | " |
| 010 VOC | " | " | - | 1 | 4.4 | | | Rule 62-212.400(12), F.A.C. & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.16. |
| 011 VOC | " | " | - | 1 | 4.4 | | | " | " |
| 010 Hg | " | " | 2.2 E-02 lb/24-hour period | - | - | 9.22 E-04 | 4.04 E-03 | Rule 62-212.400(12), F.A.C. & Permit No. 0990234-006-AC/PSD-FL-108F | III.C.17. |
| 011 Hg | " | " | 2.2 E-02 lb/24-hour period | - | - | 9.22 E-04 | 4.04 E-03 | " | " |

Notes:
* The "Equivalent Emissions" listed are for informational purposes only.

Table 2, Summary of Compliance Requirements

Solid Waste Authority of Palm Beach County
North County Regional Resource Recovery Facility

Draft/Proposed Permit No. 0990234-022-AV
Facility ID No. 0990234

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

E.U. ID No. Brief Description

| | |
|-----|------------------------------------|
| 001 | Municipal Solid Waste Boiler No. 1 |
| 002 | Municipal Solid Waste Boiler No. 2 |
| 019 | Ash Building and Handling System |

The following apply to each individual emissions unit

| Pollutant Name or Parameter | Fuel(s) | Compliance Method | Testing Time Frequency | Frequency Base Date * | Min. Compliance Test Duration | CMS † | Regulatory Citation(s) | See permit condition(s) |
|---------------------------------|---------|---|-------------------------------------|-----------------------------|-------------------------------------|-------|--|-------------------------|
| | | | | | | | | |
| VE (opacity) | MSW | COMS | CY, 5 in 5-year period (CEMS) | | 1-hour test | Yes | PSD-FL-108H (s.c. #17.e.), 40 CFR 60.38b & 40 CFR 60.58b(c)(8) & Rule 62-297.310(7)(a)4., F.A.C. | III.A.27.-30. |
| Cd | MSW | EPA Method 29 | CY, 5 in 5-year period | | 3 1-hour test runs | No | 40 CFR 60.38b & 40 CFR 60.58b(d)(1)(vii) | III.A.27.-30. |
| Hg | MSW | EPA Method 29 or 101A | CY, 5 in 5-year period | | 3 1-hour test runs | No | 40 CFR 60.38b & 40 CFR 60.58b(d)(2) | III.A.27.-30. & 33. |
| Pb | MSW | EPA Method 12 or 29 | CY, 5 in 5-year period | | 3 1-hour test runs | No | 40 CFR 60.38b & 40 CFR 60.58b(d)(1)(vii) | III.A.27.-30. |
| SO ₂ | MSW | CEMS | daily (CEMS) | | 24-hour daily geometric mean | Yes | 40 CFR 60.38b & 40 CFR 60.58b(e)(4) and PSD-FL-108H (s.c. #17.d.) | III.A.27.-30. |
| HCl | MSW | EPA Method 26, 26A & modifications | annual ² | | 1-hour | No | 40 CFR 60.38b, 40 CFR 60.58b(f)(7) & PSD-FL-108A (s.c. #4.) | III.A.27.-30. & 32. |
| Dioxin/Furan | MSW | EPA Method 23 | CY, 5 in 5-year period ³ | | 4-hours | No | 40 CFR 60.38b & 40 CFR 60.58b(g)(i)-(iii) | III.A.27.-30. & 31. |
| NO _x | MSW | CEMS | daily (CEMS) | | 24-hour daily arithmetic average | Yes | 40 CFR 60.38b & 40 CFR 60.58b(h)(3) and PSD-FL-108H (s.c. #17.d.) | III.A.27.-30. |
| CO | MSW | CEMS | daily (CEMS) | | 4-hour block average | Yes | 40 CFR 60.38b & 40 CFR 60.58b(i)(3) and PSD-FL-108H (s.c. #17.d.) | III.A.27.-30. |
| VOC | MSW | Compliance with the CO limit | N/A | | N/A | N/A | PSD-FL-108A (s.c. #4.) & PSD-FL-108J | III.A.27.-30. |
| F | MSW | EPA Method 13A or 13B | every 5 years | | 3 1-hour test runs | No | Rule 62-297.310(7)(a)3., F.A.C. | III.A.27.-30. |
| VE - fugitive ash emissions | | EPA Method 22 | annual ² | | 3 1-hour observations | No | 40 CFR 60.38b & 40 CFR 60.58b(k) | III.A.27.-30. |
| O ₂ /CO ₂ | MSW | Method 3, 3A, or 3B, or as an alternative ASME PTC-19-10-1981-Part 10 | N/A | | N/A | Yes | 40 CFR 60.38b | III.A.26. |
| steam flow | MSW | | N/A | | N/A | Yes | 40 CFR 60.38b & 40 CFR 60.58b(l)(6) | III.A.23. |
| inlet temperature to baghouse | | | N/A | | N/A | Yes | 40 CFR 60.38b & 40 CFR 60.58b(l)(7) | III.A.24. |
| RDF analysis | MSW | EPA Method 19 | during compliance stack tests | | | No | PSD-FL-108A | III.A.34. |

Notes:

"N/A" represents not applicable.

"CY" represents calendar year.

* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

† CMS [=] continuous monitoring system.

² The CFR contained an error on testing frequency per the 01/22/2009 dated e-mail from U.S. EPA.

³ Test at least one MWC unit annually, subject to 40 CFR 60.58b(g) requirements.

Table 2, Summary of Compliance Requirements

| Solid Waste Authority of Palm Beach County | | | Draft/Proposed Permit No. 0990234-022-AV | | | | |
|---|---|--|--|----------------|-----------------------|-------|-------------------------|
| North County Regional Resource Recovery Facility | | | Facility ID No. 0990234 | | | | |
| This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. | | | | | | | |
| E.U. ID No. | Brief Description | | | | | | |
| 004 | Class III Landfill and Flare (1,800 scfm, manufactured by LFG Specialties, model number PCF82018) | | | | | | |
| 008 | Class I Landfill and Flare (3,500 scfm, manufactured by Shaw LFG Specialties, model number CF1238110) | | | | | | |
| The following apply to the flares | | | | | | | |
| Pollutant Name or Parameter | Fuel(s) | Compliance Method | Testing Time | Frequency | Min. Compliance | CMS** | See permit condition(s) |
| | | | Frequency | Base Date * | Test Duration | | |
| 004 & 008 landfill gas flow rate | | | monthly | | monthly | Yes | III.B.11. & 12. |
| 004 & 008 landfill gas sulfur content | | ASTM Method D1072-90, or later method | annual | | | No | III.B.13., 15. & 21. |
| 004 & 008 landfill gas net heating value | | ASTM D1945-03 | | | 3-30 minutes | No | III.B.15. & 18. |
| 004 & 008 actual flare gas exit velocity | | in-place calibrated flow meter | monthly | | monthly | Yes | III.B.11., 15. & 19. |
| 004 & 008 VE | | EPA Method 22 | annual | | 3 1-hour observations | No | III.B.15.-17. & 20. |
| Notes: | | | | | | | |
| * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C. | | | | | | | |
| **CMS [=] continuous monitoring system. | | | | | | | |

Table 2, Summary of Compliance Requirements

| | | | | | | | |
|---|--|--------------------------------------|---|------------------------------|--------------------------------------|--------------|--------------------------------|
| Solid Waste Authority of Palm Beach County North County Regional Resource Recovery Facility | | | Draft/Proposed Permit No. 0990234-022-AV Facility ID No. 0990234 | | | | |
| This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit. | | | | | | | |
| E.U. ID No. | Brief Description | | | | | | |
| 010 | BPF Sludge Dryer Train #1 | | | | | | |
| 011 | BPF Sludge Dryer Train #2 | | | | | | |
| 012 | BPF Recycle Material Bin and Pellet Storage Silo for Sludge Dryer Train #1 | | | | | | |
| 014 | BPF Recycle Material Bin and Pellet Storage Silo for Sludge Dryer Train #2 | | | | | | |
| The following apply to each individual emissions unit | | | | | | | |
| Pollutant Name or Parameter | Fuel(s) | Compliance Method | Testing Time Frequency | Frequency Base Date * | Min. Compliance Test Duration | CMS** | See permit condition(s) |
| 010 & 011 NO _x | natural or landfill gas | EPA Method 7 or 7E | renewal (every 5 years) | | 1-hour | No | III.C.22., 24. & 27. |
| 010 & 011 PM/PM ₁₀ | " | EPA Method 5 | renewal (every 5 years) | | 3 1-hour test runs | No | III.C.22., 24. & 27. |
| 010 & 011 VE | " | EPA Method 9 | annual | | 30 minutes | No | III.C.22., 23. & 27. |
| 012 & 014 PM/PM ₁₀ | " | EPA Method 5 | waived | | - | No | III.C.22., 26. & 27. |
| 012 & 014 VE | " | EPA Method 9 | annual | | 30 minutes | No | III.C.22., 23. & 27. |
| 010 & 011 SO ₂ | " | EPA Method 6C | renewal (every 5 years) | | 1-hour | No | III.C.22., 24. & 27. |
| 010 & 011 CO & VOC | " | EPA Method 10 & EPA Method 25 or 25A | none, comply w/ O&M Manual | | - | No | III.C.22., 25. & 27. |
| 010 & 011 Hg | " | EPA Method 101A or 105 | renewal (every 5 years) | | 3 1-hour test runs | No | III.C.22., 24. & 27. |
| Notes: | | | | | | | |
| * The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C. | | | | | | | |
| **CMS [=] continuous monitoring system. | | | | | | | |

Memorandum

Florida Department of Environmental Protection

TO: Jeffery F. Koerner, Office of Permitting and Compliance
THROUGH: Syed Arif, PE, Minerals & Metals Section SA 11/17
THROUGH: Scott Sheplak, PE, Minerals & Metals Section 2/8 11/19
FROM: Edward J. Svec, Minerals & Metals Section
DATE: November 8, 2011
SUBJECT: Draft/Proposed Permit No. 0990234-022-AV
Draft Permit Revision No. 0990234-021-AC/PSD-FL-108J
Solid Waste Authority of Palm Beach County, North County Regional Resource
Recovery Facility
Title V Air Operation Permit Revision

Attached for your review are the following items:

- Written Notice of Intent to Issue Air Permit;
- Public Notice of Intent to Issue Air Permit;
- Statement of Basis;
- Draft/proposed permit;
- Draft air construction permit revision;
- Draft Preliminary Determination and Technical Evaluation; and,
- P.E. Certification.

The draft/proposed permit revises the Title V permit for the North County Regional Resource Recovery Facility, which is located in Palm Beach County, Florida. The Statement of Basis provides a summary of the project and the rationale for issuance. The P.E. certification briefly summarizes the proposed project.

The application was received and deemed complete on September 16, 2011. Day 90 is December 15, 2011. There is no ongoing/open enforcement case for this facility, according to the Department of Environmental Protection's Southeast District Office.

I recommend your approval of the attached draft/proposed permit.

Attachments

Friday, Barbara

From: Friday, Barbara
Sent: Monday, November 21, 2011 1:38 PM
To: 'mhammond@swa.org'
Cc: 'Marybeth Morrison'; 'christopher.tilman@arcadis-us.com'; Anderson, Lennon; 'james_stormer@doh.state.fl.us'; Mulkey, Cindy; 'ceron.heather@epa.gov'; 'forney.kathleen@epamail.epa.gov'; 'oquendo.ana@epa.gov'; Searce, Lynn; Arif, Syed; Svec, Ed
Subject: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV
Attachments: 0990234-021-AC-022-AV SignedWrittenNoticeofIntent.pdf

Tracking:

| Recipient | Delivery |
|---------------------------------------|-------------------------------|
| ✓ 'mhammond@swa.org' | |
| ✓ 'Marybeth Morrison' | |
| ✓ 'christopher.tilman@arcadis-us.com' | |
| Anderson, Lennon | Delivered: 11/21/2011 1:39 PM |
| ✓ 'james_stormer@doh.state.fl.us' | |
| ✓ Mulkey, Cindy | Delivered: 11/21/2011 1:39 PM |
| 'ceron.heather@epa.gov' | |
| 'forney.kathleen@epamail.epa.gov' | |
| 'oquendo.ana@epa.gov' | |
| ✓ Searce, Lynn | Delivered: 11/21/2011 1:39 PM |
| ✓ Arif, Syed | Delivered: 11/21/2011 1:39 PM |
| ✓ Svec, Ed | Delivered: 11/21/2011 1:39 PM |

Dear Mr. Hammond:

Attached is the official **Notice of Draft/Proposed Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Ed Svec

Owner/Company Name: SOLID WASTE AUTHORITY OF PBC
Facility Name: SOLID WASTE AUTHORITY OF PBC/NCRRF
Project Number: 0990234-021-A/PSD-FL-108J – 0990234-022-AV
Permit Status: DRAFT/PROPOSED TITLE V REVISION
Permit Activity: DRAFT CONSTRUCTION REVISION
Facility County: PALM BEACH

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0990234.021.AC.D_pdf.zip

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0990234.022.AV.D_pdf.zip

The Office of Permitting and Compliance 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. Access these documents by clicking on the link provided above, or search for other project documents using the “*Air Permit Documents Search*” website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Note: The attached 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> .

Regards,

Barbara Friday

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9095

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).

Friday, Barbara

From: Mark Hammond [mhammond@swa.org]
Sent: Monday, November 28, 2011 8:14 AM
To: Friday, Barbara
Subject: RE: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

I have received and viewed the documents.

Thank you,
Mark Hammond

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Monday, November 21, 2011 1:38 PM
To: Mark Hammond
Cc: Marybeth Morrison; 'christopher.tilman@arcadis-us.com'; Anderson, Lennon; 'james_stormer@doh.state.fl.us'; Mulkey, Cindy; 'ceron.heather@epa.gov'; 'forney.kathleen@epamail.epa.gov'; 'oquendo.ana@epa.gov'; Searce, Lynn; Arif, Syed; Svec, Ed
Subject: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Dear Mr. Hammond:

Attached is the official **Notice of Draft/Proposed Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Attention: Ed Svec

Owner/Company Name: SOLID WASTE AUTHORITY OF PBC
Facility Name: SOLID WASTE AUTHORITY OF PBC/NCRRF
Project Number: 0990234-021-A/PSD-FL-108J – 0990234-022-AV
Permit Status: DRAFT/PROPOSED TITLE V REVISION
Permit Activity: DRAFT CONSTRUCTION REVISION
Facility County: PALM BEACH

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0990234.021.AC.D_pdf.zip

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0990234.022.AV.D_pdf.zip

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search for other project documents using the “*Air Permit Documents Search*” website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Note: The attached 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> .

Regards,

Barbara Friday

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9095

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).

Friday, Barbara

From: Microsoft Exchange
To: 'christopher.tilman@arcadis-us.com'
Sent: Monday, November 21, 2011 1:39 PM
Subject: Relayed: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

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

'christopher.tilman@arcadis-us.com'

Subject: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Tilman, Christopher [Christopher.Tilman@arcadis-us.com]
Sent: Monday, November 21, 2011 2:08 PM
To: Friday, Barbara
Subject: Read: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY
RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV
Attachments: Read: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY
RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

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Friday, Barbara

From: Microsoft Exchange
To: 'james_stormer@doh.state.fl.us'
Sent: Monday, November 21, 2011 1:39 PM
Subject: Relayed: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

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: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: James_Stormer@doh.state.fl.us
To: Friday, Barbara
Sent: Monday, November 21, 2011 1:47 PM
Subject: Read: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY
RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Your message was read on Monday, November 21, 2011 1:46:53 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Mulkey, Cindy; Searce, Lynn; Anderson, Lennon
Sent: Monday, November 21, 2011 1:39 PM
Subject: Delivered: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Your message has been delivered to the following recipients:

Mulkey, Cindy

Searce, Lynn

Anderson, Lennon

Subject: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY;
0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Mulkey, Cindy
To: Friday, Barbara
Sent: Monday, November 21, 2011 1:47 PM
Subject: Read: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY
RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Your message was read on Monday, November 21, 2011 1:47:19 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Searce, Lynn
To: Friday, Barbara
Sent: Monday, November 21, 2011 1:40 PM
Subject: Read: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY
RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Your message was read on Monday, November 21, 2011 1:39:46 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: Arif, Syed; Svec, Ed
Sent: Monday, November 21, 2011 1:39 PM
Subject: Delivered: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Your message has been delivered to the following recipients:

Arif, Syed

Svec, Ed

Subject: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY RESOURCE RECOVERY FACILITY;
0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Arif, Syed
To: Friday, Barbara
Sent: Monday, November 21, 2011 1:43 PM
Subject: Read: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY
RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Your message was read on Monday, November 21, 2011 1:43:12 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Svec, Ed
To: Friday, Barbara
Sent: Monday, November 21, 2011 1:45 PM
Subject: Read: SOLID WASTE AUTHORITY OF PALM BEACH COUNTY/NORTH COUNTY
RESOURCE RECOVERY FACILITY; 0990234-021-AC/PSD-FL-108J - 0990234-022-AV

Your message was read on Monday, November 21, 2011 1:44:37 PM (GMT-05:00) Eastern Time (US & Canada).