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DIVISION OF AIR
RESOURCE MANAGEMENT

July 22, 2011

Mr. Jonathan Holtom, P.E.
Program Administrator
Title V Section
Division of Air Resource Management
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

VIA ELECTRONIC MAIL

Subject: North County Resource Recovery Facility
Draft/Proposed Permit No. 0990234-020-AV, Title V Operation Permit Renewal
Draft Permit No. 099234-019-AC/PSD-FL-1081, Air Construction Permit Revision
Solid Waste Authority (SWA) of Palm Beach County
Comments on Draft Permits

Dear Mr. Holtom:

On behalf of the SWA, Camp Dresser & McKee Inc. (CDM) is submitting comments on the Draft Title V Air Operation Permit Renewal and Air Construction Permit Revision, for which public notice was published on June 24, 2011. We greatly appreciate the Department's efforts in preparing this draft permit, and the opportunity to provide the comments, below.

- 1) Statement of Basis, Page SOB-1 of 4, Facility Description, 4th paragraph. We recommend deleting "and operated by Palm Beach Resource Recovery Corporation . . . , " because they only operate a portion of the site, the NCRRF itself. NEFCO operates the Biosolids Pelletization Facility (Sludge Drying Facility), and the SWA runs the Landfills, Composting Facility and other operations.
- 2) Draft/Proposed Permit, Page 2 of 45, Section I, Facility Information, Subsection A. Facility Description, 3rd paragraph. Same comment as above.
- 3) Draft/Proposed Permit, Page 7 of 45, Section III, Condition A.2. a. and b. We request that these conditions be deleted. They restrict capacity based on waste tonnage feed rate and heat input rate. These measures of capacity cannot reliably be measured, and are not required by the underlying New Source Performance Standards for Municipal Waste Combustors, 40 CFR 60



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Subpart Cb. We believe that Condition A.2.c., which sets the unit capacity based on steam production rate, is the best means for assuring continuous compliance. It is also consistent with the 40 CFR 60.53b(b) Load Level requirements.

- 4) Draft/Proposed Permit, Page 8 of 45, Condition A.5(a)(1). This condition states that natural gas may be combusted as an "auxiliary" fuel. The term "auxiliary" is not defined in 40 CFR 60 Subparts A, Cb or Eb. We believe there is a quantitative annual capacity restriction of 10 percent for natural gas from the PSD permit. If so, and it is the Department's intent to retain that restriction, we request that it be included here. If the intent is to not have a specific restriction, we request that the natural gas annual capacity restriction be deleted from the PSD permit.
- 5) Draft/Proposed Permit, Page 11 of 45, Condition A.21. We request that the phrase "per occurrence" be added to the second sentence, so that it reads: "The Department authorizes three hours per occurrence in any 24-hour period for these emissions units." This change would make this condition consistent with the language in previous Title V permits and the PSD Permit, No. PSD-FL-108A. We also request that this PSD Permit language governing excess emissions be used in Condition C.19, on Page 24 of 45, for the Sludge Drying Facility.
- 6) Draft/Proposed Permit, Page 12 of 45, Continuous Monitoring Requirements, Permitting Note. The note includes a continuous O₂ monitor in the list of monitors installed on the RDF boilers. The boilers do not have O₂ monitors (just CO₂), so we request that this be deleted from the list.
- 7) Draft/Proposed Permit, Page 12 of 45, Condition A.27, List of Test Methods. We suggest that the EPA Method 6 series, Method 7 series, Method 10 series, and EPA Method 12 be deleted from this list, because SO₂, CO, and NO_x compliance is determined through CEMs and Relative Accuracy Test Audits (RATA), and because Pb is tested with EPA Method 29. The Resource Recovery Facility Refurbishment Project Permit 0990234-015-AC/PSD-FL-108H required that compliance with emission standards for CO, NO_x and SO₂ shall be demonstrated by data collected from required CEMS and opacity standards from required COMS.
- 8) Draft/Proposed Permit, Page 13 of 45, Condition A.29. We request that the language describing the annual basis for HCl and fugitive ash testing be changed to match that for the other pollutants. This could be done by adding HCl and fugitive ash visible emissions to the list of pollutants for which testing shall be conducted "on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test . . .)" We understand that this is consistent with EPA's intent, and that the differing basis for the HCl and fugitive ash testing is an error that EPA plans to correct.



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- 9) Draft/Proposed Permit, Page 13 of 45, Condition A.29. 40 CFR 60.58b (Appendix Eb of the Permit) states that after the initial compliance test, compliance with NOx, SO2, CO and opacity limits shall be determined continuously with the Facility CEMs and COMs. We request that this requirement from Appendix Eb be brought into the main body of the Permit following Condition A.29. The current PSD Permit 0990234-015-AC/PSD-FL-108H also requires compliance based on CEMS/COMS. (See Comment 7, above.)
- 10) Draft/Proposed Permit, Page 13 of 45, Condition A.30. We appreciate that the VOC compliance test is no longer required annually. We request that this change to have VOC testing only done prior to permit renewal also be made to the PSD permit.
- 11) Draft/Proposed Permit, Page 14 of 45, Condition A.35. This is a very helpful summary table, and we would like to see it list all of the reports required for EUs 001 and 002. For example, the table should include the Annual and Semi-Annual Reports listed in Appendix Eb. We suggest removing the NSPS Excess Emissions & Monitoring System Performance Report and adding the following to the table:

Report	Reporting Deadlines	Related Conditions
Annual Report	Every 6 months (semi-annual)	A.46 and Appendix Eb § 60.59b(g)
Semi-Annual Report	Every 6 months (semi-annual)	A.46 and Appendix Eb § 60.59b(h)
Semi-Annual Monitoring Report	Every 6 months (semi-annual) due March 1 st & Sept 1 st	A.46 and Appendix RR, RR4

- 12) Draft/Proposed Permit, Page 14 of 45, Condition A.40. This condition requires that monthly records be kept for the auxiliary burners of each MWC unit. Since there is only one natural gas meter for both auxiliary burners, we request that this be changed to recordkeeping for the burners of both units combined. Also, this condition is related to Condition A.5(a)(1), referenced in Comment 4), above. If that condition for a quantitative natural gas capacity factor is deleted, we request that this Condition A.40 be deleted, as well.
- 13) Draft/Proposed Permit, Page 19 of 45, Condition B.17. The federal fiscal year requirement has been removed for boilers EU01 & EU02. Has this requirement been removed for landfill gas flares? If so please remove language each federal fiscal year (October 1st to September 30th).
- 14) Draft/Proposed Permit, Page 20 of 45, Condition B.22. This is a very helpful summary table, and we would like to see it list all of the reports required for the flares, EUs 004 and 008. Our suggested additions to the Semi-Annual Report listed are below:



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Report	Reporting Deadlines	Related Conditions
Annual Performance Report	Annual	B.23 & B.26
Annual Operating Report (AOR)	April 1 st of each year	B.23 & B.25

- 15) Draft/Proposed Permit, Page 20 of 45, Condition B.23. Exit velocity, net heating value, and sulfur content of landfill gas directed to each flare is reported annually in a facility performance report which is different than FDEP's Annual Operating Report (AOR). SO₂ emissions in tons/year (TPY) for each flare is included in the AOR. We request you change the text to clarify the reporting requirements.
- 16) Draft/Proposed Permit, Page 21 of 45, Conditions B.28 and B.29. We request that a clarification or a permitting note be added in this section, and to the two appendices, to indicate that the NESHAP 40 CFR 61, Subpart A & M conditions only apply to the asbestos site at the Class III Landfill (and not to the Class I and Class III Flares).
- 17) Draft Permit Revision No. 0990234-019-AC/PSD-FL-108I. The Department has determined the Be limit to be obsolete for RDF Boilers No. 1 & 2, and it was removed from the Title V Air Permit. We are also requesting that the limit and testing for Be be removed from the PSD permit.
- 18) Draft/Proposed Permit, Pages 22 and 23 of 45, Subsection C. Biosolids Pelletization Facility, Description and Condition C.3. Both the first paragraph of the Description and Condition C.3. state that the dryers are fired with "natural gas or landfill gas." The operator would like permission to fire a blend of landfill gas and natural gas. There are times when insufficient landfill gas is available, but could still be used if it were just supplemented with natural gas. Since there would be no change to maximum potential emission rates (100% landfill gas is the worst case), we request that a simple language change to clarify that blending of the fuels is allowed: "The dryers may be fired with natural gas and/or landfill gas." We would appreciate your making this change both in the Title V and PSD permits.
- 19) Draft/Proposed Permit, Page 24 of 45, Condition C.19. We request that the Excess Emissions Allowed language be revised to match that in the PSD permit and Condition A.21: "The Department authorizes three hours per occurrence in any 24-hour period for these emissions units." (See also Comment 5, above.)
- 20) Draft/Proposed Permit, Page 25 of 45, Condition C.23. This visible emissions test is on the federal fiscal year schedule. If possible, we would like to see this changed to a calendar year schedule, similar to that in Condition A.29 for the Municipal Solid Waste Boilers.



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- 21) Draft/Proposed Permit, Page 26 of 45, Condition C.28 and 29. These two conditions refer to reporting of excess emissions. Because the Biosolids Pelletization Facility does not have CEMs, it cannot generate excess emission reports. We request that this condition be deleted, and default to Appendix RR, Conditions RR2 and RR3 for reporting problems and deviations, and to Appendix CAM, Condition 15.b. for tracking and reporting excursions and exceedances of CAM Plan parameters.
- 22) Draft/Proposed Permit, Page 26 of 45, Condition C.30. We recommend that these reports that are routinely required for the Biosolids Pelletization Facility be listed here: a) the CAM Plan Semi-Annual Report, and b) the Annual Visible Emissions Test Report, and from Appendix RR, c) the Semi-Annual Monitoring Report, d) the Annual Operating Report, and e) the Annual Emissions Fee.
- 23) Draft/Proposed Permit, Page 27 of 45, Subsection D Engines. We very much appreciate the permit condition streamlining and organization of this section, achieved by grouping engines into common applicability categories. We have one comment that will affect almost all of the engine EUs, however – it appears that the “Engine Brake Horsepower” values were selected from the “Brake Horse Power (Electrical Output)” column of the table we submitted with the Application. These values are the rated power of the electrical generator, and not of the engine itself. The best representative of engine brake horsepower in that table is “Max Engine Power HP (Gross Mechanical Output).” We have provided what we believe to be the correct values for Engine Brake Horsepower in the individual comments that follow.
- 24) Draft/Proposed Permit, Page 27 of 45, Engine Type Group Table. The description for Group 4 does not match the description on Page 38. Specifically, should the range correctly be 175 HP to 500 HP?
- 25) Draft/Proposed Permit, Page 29 of 45, Group 1. The Engine Brake Horsepower for this group should be:
- EU 035 – 356 HP
 - EU 036 – 273 HP
 - EU 037 – 19 HP
 - EU 039 – 19 HP
 - EU 040 – 63 HP (unchanged)
 - EU 041 – 47 HP

These changes do not change any categories or applicable requirements for these engines.



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- 26) Draft/Proposed Permit, Page 31 of 45, Condition D.5. We understand that this condition does not require the installation of CEMs. Is that correct?
- 27) Draft/Proposed Permit, Page 32 of 45, Condition D.8. We would appreciate some clarification on what a "malfunction" is. What does the term "malfunction" apply to? For example, is it an engine break-down?
- 28) Draft/Proposed Permit, Page 33 of 45, Group 2. The Engine Brake Horsepower for EU 038 should be 3,164. This does not affect its category or any applicable requirements.
- 29) Draft/Proposed Permit, Page 33 of 45, Emissions Limitations Permitting Note. The "<" should be correct to a ">", so that the category refers to "existing" stationary CI engines with ≥ 500 HP.
- 30) Draft/Proposed Permit, Page 34 of 45, EU 017. We have realized that there are two engines at the Woody Waste Facility, not one. The 2005 engine listed here as EU 017 is actually used only as a back-up engine, when the primary engine is down for repairs. We would like to request, therefore, that it be designated as a "Limited Use Engine" as defined in 40 CFR 63 Subpart ZZZZ, and restricted to fewer than 100 hours per year. We would also like to offer a few corrections to the information listed for this engine. It has an Engine Brake HP of 1,180, its Date of Construction (Purchase Date) is 10/25/2006, the Model Year of 2005 is correct, the Model # is 3412, and the engine serial number is correct. We understand that there will be no applicable requirements except for an Initial Notification for this Limited Use engine. Would it continue to be a significant EU?

The primary Woody Waste Facility Diesel Engine is a 2001 engine. It is also a Caterpillar Model No. 3412, with 1,180 BHP, non-emergency, and displacement of 2.25 l/c. The 2001 engine was purchased on 12/10/2001, model year 2001, and has an engine serial number of BDT00610. We propose that this be EU 017. The title of Group 3 in the permit could become - "Existing" Stationary Emergency CI RICE greater than 500 HP. The Condition D.15 Emission Limitation would be a CO concentration of 23 ppm_{dv} at 15 percent O₂, or reduce CO emissions by 70 percent or more (40 CFR 63.6600(d), Table 2c). The testing requirements in Condition D.24. would be limited to CO (no formaldehyde), and the Condition D.25. Testing Frequency would be once every 8,760 hours or 3 years, whichever comes first.

The compliance date for these requirements would be May 3, 2013.

- 31) Draft/Proposed Permit, Page 38 of 45, Group 4. The Engine Brake Horsepower for this group should be:



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- EU 016 – 550 HP
- EU 021 – 250 HP (Model Year 2008 and Model #DSGAB)
- EU 043 – 775 HP

This does change how these engines are categorized. With greater than 500 HP, this puts EU 016 and EU 043 into a new regulatory Group in the permit, leaving only EU 021 in Group 4. It appears that a new Group 6 would have to be created for EU 016 and EU 043: “New” Stationary Emergency CI RICE greater than 500 HP. They also have a manufacture date after 4/1/2006. Under 40 CFR 63 Subpart ZZZZ, these engines would have no emissions limitations, testing or compliance requirements, but would be subject to the hours restriction in 40 CFR 63.6640(f), and to the maintenance requirements in Table 2c to Subpart ZZZZ. Because they were manufactured after April 1, 2006, these engines are also subject to 40 CFR 60 Subpart IIII. EU 016, the BPF Emergency Generator, fulfills these requirements by being EPA Tier 3 certified. EU 043, the MRF Emergency Generator, fulfills these requirements by being Tier 2 certified. (Note that they have different emissions standards because the MRF Emergency Generator has a power output rating greater than 560 kW or 750 hp.)

- 32) Draft/Proposed Permit, Page 41 of 45, Group 5. The Engine Brake Horsepower for EU 042 should be 913. Also, we suggest it be identified as EPA Tier 1 certified in the information block at the top of the page. This does not change its category or any applicable requirements.
- 33) Appendix CAM, Page CAM-5 of 5. The footnote at the bottom of the page states that the excursion level shall be re-evaluated at the time of permit renewal, based upon the most recent stack test data and the manufacturer’s recommendations. We suggest that this condition be added to the main body of the permit so it is not overlooked.
- 34) Appendix RR Facility-Wide Reporting Requirements, RR1 Reporting Schedule Table. This is a very helpful summary table, but we would like to see two reports added to the table for EU01 & EU02. The report requirements were formerly R.10 & R. 11 of the previous Title V Air Permit and need to be added to this appendix. Once these conditions are added the related conditions can be completed in the Table:

Report	Reporting Deadlines	Related Conditions
Annual Report	every 6 months (semi-annual)	
Semi-Annual Report	every 6 months (semi-annual)	

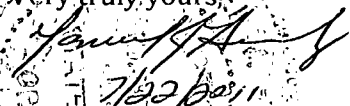


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- 35) Table L-3 Summary of Compliance Reporting Requirements for MSW Landfills. The Table states that NMOC Emission Rate Report is to be repeated either once a year OR once every 5 years. According to 40 CFR 60, subpart www, a facility is exempt from this requirement if they have installed a landfill gas collection system. Please incorporate this into the table.
- 36) Appendix TR, Pages TR-4 and 5 of 7, Condition TR7. This condition contains references, in (2) and (4) to requiring that compliance testing be done during each federal fiscal year (October 1 – September 30). We would like to request that this language be made consistent with that in Condition A.29, which requires compliance testing “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).”

Thank you again, and please contact either Cynthia Hibbard (617-452-6244; hibbardcs@cdm.com) or me (561-689-3336; hernandezmj@cdm.com) with any questions you have.

Very truly yours,



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