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SOLID WASTE SOLUTIONS

December 16, 2011

Mr. Syed Arif, P.E.  
Program Administrator  
Office of Permitting and Compliance Section  
Florida Department of Environmental Protection  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: North County Resource Recovery Facility Refurbishment Project  
Draft/Proposed Permit No. 0990234-022 AV, Title V Operation Permit Revision  
Draft Permit No. 0990234-021-AC/PSD-FL-108J, Air Construction Permit Revision  
Solid Waste Authority (SWA) of Palm Beach County  
Comments on Draft Permits

Dear Mr. Arif:

The Solid Waste Authority (SWA) is submitting comments on the Draft Title V Air Operation Permit Revision and Air Construction Permit Revision, for which public notice was published on November 30, 2011. We greatly appreciate the Department's efforts in preparing this draft permit, and the opportunity to provide the comments, below.

**DRAFT Permit 0990234-021-AC/PSD -FL-108J & PSD-FL-108A**

- 1) Section 2, Permit Revisions, page 4 of 5, PSD-FL-108A, Specific Condition No. 4 - This condition lists the pollutants that shall be tested for EU001 & EU002 on a calendar year basis (no less than 9 calendar months and no more than 15 calendar months following the previous performance test for Particulate Matter, NO<sub>x</sub>, Carbon Monoxide, Lead, Mercury, SO<sub>2</sub>, Opacity, and Dioxin/ Furans. It appears that the pollutant Cadmium (Cd) is missing from this list. We request that the PSD permit be revised accordingly by adding it to this list to be consistent with the Title V Air Permit for the facility.
- 2) Section 2, Permit Revisions, page 4 of 5, PSD-FL-108A, Specific Condition No. 4 - The request to change the testing frequency of VOC emissions was granted by the Department. The condition states that *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 that the VOC limit is not being met, a special compliance test could be required.* The facility has two permit limits for CO:

200 ppmvd (24-hour average) and 400 ppmvd (4-hour block average). We are asking that the Department clarify which permit limit (or both) for CO is to be used to demonstrate compliance for VOC emissions and to revise the permit accordingly.

- 3) Section 2, Permit Revisions, page 5 of 5, Specific Condition No. III.A.17c- This condition states that *compliance tests for Beryllium (Be) and Fluorides (F) may be conducted at the next regularly scheduled test deadline as specified in the current Title V Air Operation Permit*. Based upon a past EPA determination, Be and F permit limits and testing were removed from the Title V Air permit as part of the recent permit renewal process. We request that the PSD permit be revised accordingly to be consistent with the Title V Air Permit for the facility.

**DRAFT/Proposed Title V Air Operation Permit 0090234-022-AV**

- 4) Page III.A.-10, A.30 VOC Emissions Testing – The request to change the testing frequency of VOC emissions was granted by the Department. The condition states that *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 that the VOC limit is not being met, a special compliance test could be required*. The facility has two permit limits for CO: 200 ppmvd (24-hour average) and 400 ppmvd (4-hour block average). We are asking that the Department clarify which permit limit (or both) for CO is to be used to demonstrate compliance for VOC emissions and to revise the permit accordingly.
- 5) Table 2 Summary of Compliance Requirements – During the recent Title V Air operation permit renewal process, Fluoride (F) emission limits and testing requirements for EU001 & EU002 were removed from the permit. However, it appears that F was inadvertently left on Table 2. We request that F limit and testing requirements be removed from Table 2 as there is no longer any fluoride emission limit in the permit.
- 6) 099023-015-AC/PSD-FL-108H Condition 18b. Test Reports- This condition states *For each required cadmium, dioxin/furan, lead, mercury, and PM test run, the permittee shall also record and report the actual ACI rate, lime injection rate, and temperature data for the fabric filter system*. We are requesting that this condition be added to the Title V Air Operation permit so that it is consistent with the PSD permit.
- 7) 099023-015-AC/PSD-FL-108H Condition 18d. Test Reports- This condition states *For each required hydrochloric acid test run, the permittee shall also record and report the actual lime injection rate [Rule 62-297.310(8), F.A.C.]*. We are requesting that this condition be added to the Title V Air Operation permit so that it is consistent with the PSD permit.

Thank you again, and please contact me at [mmorrison@swa.org](mailto:mmorrison@swa.org) or at (561) 640-4000 ext.4613 if you have any questions.

Sincerely,



Mary Beth Morrison  
Environmental Programs Supervisor  
Solid Waste Authority of Palm Beach County

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