



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

4APT-AP/ch

Mr. Clair H. Fancy, P. E.  
Deputy Chief  
Bureau of Air Quality Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32301

OCT 9 1986

RE: South Broward and West Palm Beach Counties Resource Recovery Facilities

Dear Mr. Fancy:

This is in reference to your September 25, 1986, letter submitting the staff analysis, hearing officer's recommended orders, and final certifications of the above-referenced power plant site certifications. The staff analyses as presented for both facilities present the Department's preliminary determinations for PSD reviews. However, the public notices were not included. These notices must provide a description of the project, increment consumption, and the opportunity to comment and request a public hearing. We request that you forward these notices to EPA. Based upon our conclusions, drawn from your staff analyses, 90% acid gas control and particulate emissions on the order of 0.015 gr./dscf will be required for both facilities. Although this will be in conflict with the State of Florida final order issued for the South Broward facility, we feel that the BACT determination for acid gas control and stringent particulate emissions limits is in agreement with "state of the art" controls now being employed at similar facilities throughout the country and the PSD remand for the North County Resource Recovery facility in California. The remand states that more stringent BACT requirements for regulated pollutants may be imposed where the simultaneous control of hazardous yet unregulated pollutants is achieved.

Please prepare the final determinations to reflect the requirement for acid gas control and a 0.015 gr/dscf particulate emission limit for the two facilities. Once we receive the final determinations and public notices, we will proceed to issue the PSD permits.

If you have any questions and/or comments regarding this letter, you may contact me at 404-347-2864 or Mr. Wayne J. Aronson at 404-347-4901.

Sincerely yours,

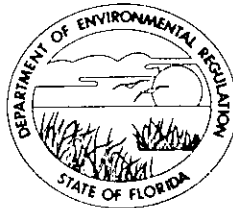
*Bruce P. Miller*

Bruce P. Miller  
Chief  
Air Programs Branch  
Air, Pesticides, & Toxics  
Management Division

DER  
OCT 13 1986  
BAQM

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

September 25, 1986

Mr. Bruce Miller, Chief  
Air Programs Branch  
Air, Pesticides, and Toxics  
Management Division  
U.S. EPA - Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Dear Mr. Miller:

Re: South Broward County and Palm Beach County Resource Projects

In response to your discussion with Ed Svec in Atlanta on September 11, 1986, we are enclosing copies of the staff analysis, hearing officer's recommended orders, and final certifications of the above referenced power plant site certifications. We feel that these documents contain all the information necessary for your review and issuance of the required PSD permits. However, if you require any additional information, please feel free to contact me.

Sincerely,

C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/ES/s

Ed:  
Changes to emission  
limits.

HCL 4.0#/ton

DRAFT BACT  
FOR REVIEW/COMMENTS  
CONTENTS SUBJECT TO CHANGE

BACT Determination by DER:

Pollutant	Emission Limit Per Source
Particulate Matter	0.015 <del>0.03</del> grains/dscf, corrected to 12% CO <sub>2</sub> <span style="float: right;">27.5 <del>37.8</del> #/m 165.4 tpy</span>
Sulfur Dioxide	2.8 lb/ton MSW charged, 30 day average, not to exceed 5.6 Lb/Ton. <span style="float: right;">315.6 #/m 1382.2 tpy</span> <span style="float: right;">631.1 #/m</span>
Nitrogen Oxides	3.0 lb/ton MSW charged <span style="float: right;">338.1 #/m, 1480.9 tpy</span>
Carbon Monoxide	0.8 lb/ton MSW charged <span style="float: right;">90.2 #/m, 394.9 tpy</span>
Fluorides	90% control by <del>Wt/L</del> <span style="float: right;">2.3 #/m, 9.9 tpy</span>
Lead	<del>90% control</del> (1) 0.37 #/ton Pb
Mercury	3200 <del>2240</del> grams/day [2]
Beryllium	8.4 x E-6 lb/ton MSW charged <span style="float: right;">9.0 x E-4 #/m 4.1 x E-3 tpy</span>
Visible Emission	15 percent opacity
VOC	0.12 lb/ton <span style="float: right;">13.5 #/m, 59.2 tpy</span>

(1) No definite emission limit set but control technology

discussed in BACT Determination Rationale.

H<sub>2</sub>SO<sub>4</sub> Mist 47.7 #/m, 209.8 tpy uncontrolled ⇒ 4.8 #/m, 20.9 tpy

(2) When more than 2205 lb/day of municipal sewage sludge is ~~fired~~ controlled  
90% compliance with the mercury emission limit shall be demonstrated in accordance with 40 CFR 61, Method 101 Appendix B.

Compliance with limitations for sulfur oxides, particulate matter, and nitrogen oxides will be demonstrated in accordance with Florida Administrative Code Rule 17-2.700, DER Methods, 1, 2, 3, 4, 5, and 6, and 40 CFR 60 Appendix A; Method 7. Compliance

1000

1000

1000

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# Modeling

1500 tpd : no problem

Everglades Class I would have to be looked  
at if went bigger

sig impact

ann	24hr	3hr
1	5	25

SO<sub>2</sub>

just look  
at their  
own

ann	24hr
1	5

TSP

IF went to 3000 tpd, would push 5 on 24hr SO<sub>2</sub>  
not much in Broward area to combine with anyhow