From: Faller, Chuck
To: Arif, Syed
Cc: Svec, Ed; Turnbull, Nicole; Porter, Timothy
Subject: Wheelabrator North and South Broward
Date: Thursday, February 07, 2013 3:11:23 PM

Mr Arif,

I have been reviewing the Title V permits for Wheelabrator North Broward (permit # 0112120-013-AV) and Wheelabrator South Broward (permit # 0112119-015-AV) and found what I believe to be minor discrepancies that I was hoping could be corrected through an administrative amendment for each facility.

1) In both permits, condition A.39 lists a table titled "Reporting Schedule". In this Table the information required to be maintained at the facility for Condition A.44. (natural gas and fuel oil), A.45. (Charging Rate Monitoring) and A.46. (Segregated Solid Waste Record Keeping) appears to indicate that the information has to be submitted to the Department on a monthly and/or daily basis. This Condition A.39 table would appear to be inconsistent with Conditions A.44, 45 and 46 which require the data to be maintained at the facility, but not submitted to the Department. Additionally, a daily submittal seems slightly problematic, logistically speaking. Is it possible to remove this Table altogether and list the condition as "Reserved"? Or is it possible to remove Natural Gas, Charging Rate and Segregated Loads from the Table? Or is it possible to reword the Table so that "Reporting Deadline" is changed to "Reporting Frequency" and the statement about being submitted to the Compliance Authority removed or edited?

2) Also, for the North Broward permit only, Condition A.7.d lists that mercury is controlled at the facility by source separation techniques. While that is true today, the purpose of the recent Title V revision was to allow for the installation of an activated carbon system. This condition's inclusion appears to be an oversight that I was hoping could be corrected. Could the condition be removed or the wording be amended to reflect the upcoming carbon injection system, similar to condition A.35?

I appreciate your consideration on these minor discrepancies and would appreciate any guidance you could provide on how to proceed. Thank you.

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