PALM BEACH COUNTY, FLORIDA

RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

LETTER DATED AUGUST 22, 1985

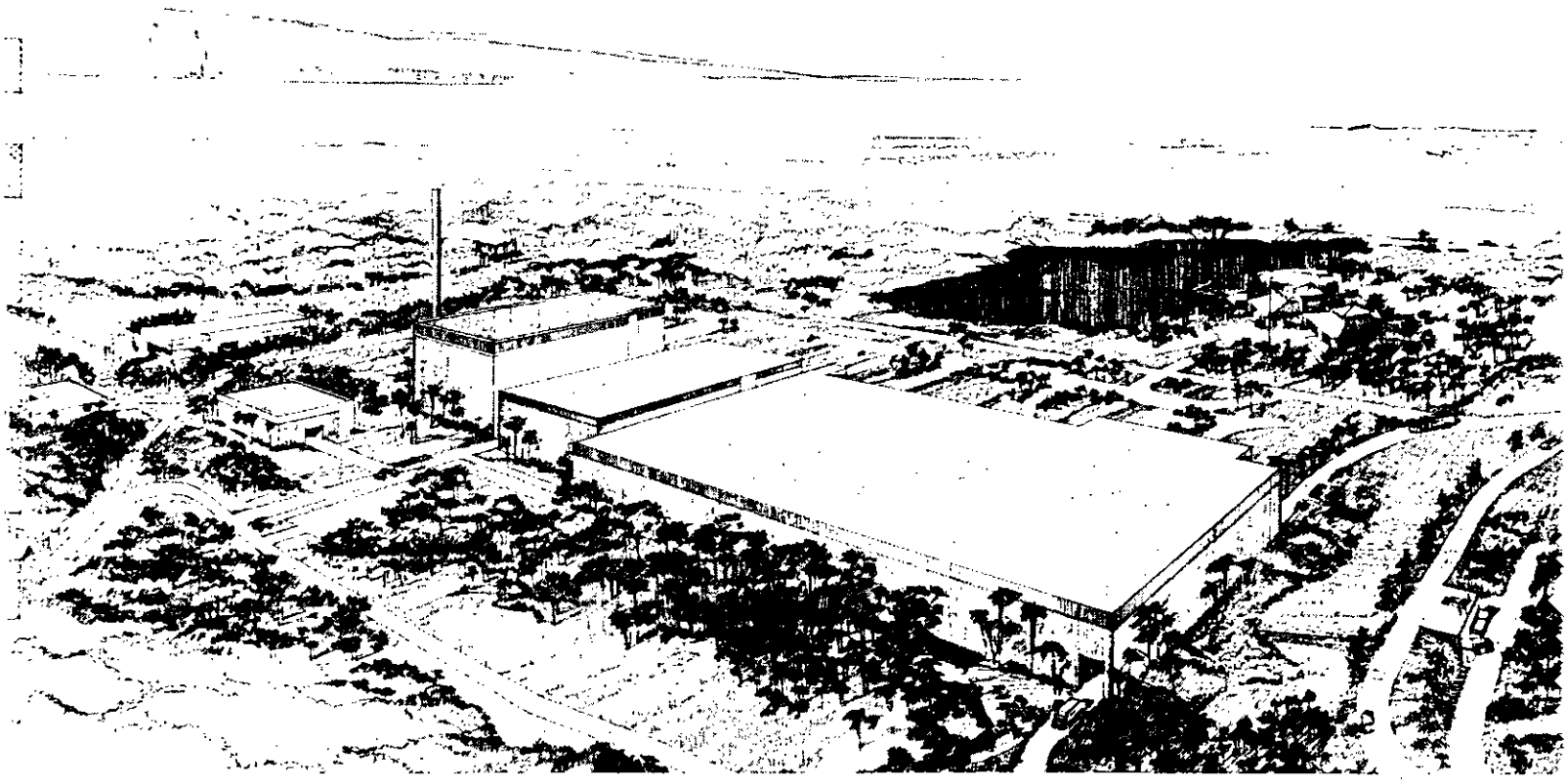
PALM BEACH COUNTY RESOURCE RECOVERY FACILITY

PA 84-20

DOAH CASE NO. 85-2032

SUBMITTED BY

THE PALM BEACH COUNTY SOLID WASTE AUTHORITY



PALM BEACH COUNTY
SOLID WASTE AUTHORITY

November 19, 1985

State of Florida
Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Attn: Mr. Hamilton S. Oven, Jr., P.E.
Administrator
Siting Coordination Section

Re: Response to August 22, 1985 Letter
Application for Power Plant Siting Certification
Resource Recovery Facility
Solid Waste Authority
Palm Beach County, Florida

Dear Mr. Oven:

Accompanying this letter are 45 copies of the Response to your letter of August 22, 1985 in which a total of 10 questions/comments were raised by the Florida Department of Health and Rehabilitative Services concerning the Application. Individual responses to each of the 10 questions/comments are included in each response book for distribution.

Should you have any further questions, please contact our office.

Very truly yours,

Thomas R. Keith
Director of Environmental
Programs

TRK/esc
enclosures

5114 Okeechobee Blvd. / Suite 2C / West Palm Beach, Florida 33409 / Telephone (305) 471-5770

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

August 22, 1985

Mr. Tim Hunt, Jr.
Executive Director
Palm Beach County Solid
Waste Authority
3114 Okeechobee Blvd.
Suite 2C
West Palm Beach, FL 33409

Dear Mr. Hunt:

Attached are comments and questions submitted by the Palm Beach County Health Department. You may wish to consider or respond to these comments as may be appropriate.

Sincerely,

Hamilton S. Oven, Jr.

Hamilton S. Oven, Jr., P.E.
Administrator
Siting Coordination Section

HSOjr/sb

Attachment

cc: Don White

RECEIVED
AUG 26 1985

STATE OF FLORIDA

DEPARTMENT OF

Bob Graham, Governor

Health & Rehabilitative Services

District Nine
P. O. Box 29

Palm Beach County Health Dept.
West Palm Beach, Florida 33402

Please Address
Reply to: ESE-WPB

August 15, 1985

Mr. Hamilton S. Oven, Jr., P.E.
Administrator
Siting Coordination Section
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Dear Mr. Oven:

Below please find our very preliminary comments pursuant to your letter dated June 19, 1985 regarding the Palm Beach County Resource Recovery Plant (PA 84-20).

Our staff will continue to review subject application and submit comments at appropriate times.

1. Vol IV - Air Quality, page 2, paragraph 1.4 states that "Palm Beach County is in attainment with all NAAQS". It should be noted that Palm Beach County has been officially designated non-attainment for the pollutant ozone and that the plans to construct subject facility should be prepared accordingly.

2. Vol IV - Air Quality, page 16. Where will the CO monitor be located?

3. Volume IV, page 18 states that the SO_2 emission factor, used in calculating the facilities emissions, is based only on the sulfur content of RDF.

   Volume IV, page 23 states that auxiliary fuel is used during start-up and shut-down and will constitute 1.25% of the heat input to each furnace and either No. 2 oil or natural gas will be used as the auxiliary fuel.

   Volume I, Section 3-11 indicates that auxiliary burners will be used to assist the combustion process when refuse is wet or otherwise difficult to burn.

   Volume 1, Section 3-8 suggests that landfill gas may be used as a source of auxiliary fuel.

It should be determined what the auxiliary fuel will be, what the amount consumed will be, and what the actual sulfur content of this fuel will be.

Auxiliary fuel usage may prove to be a significant source of SO_2 and should be examined more closely.

4. Volume I, Section 2-10 states that should a total combustion shutdown occur, the RDF processing line would continue to operate until the RDF stockpile exceeded storage capacity (2 to 3 days).

   If a total combustion shutdown occurred, the negative air system utilized in the storage area would not be able to vent the odors to the furnace for incineration as originally intended.

   Is an alternative method of odor abatement to be employed during total combustion shutdown?

5. The dust control system used on the RDF processing line is currently designed to vent exhaust air directly to the outside environment.

   The negative air system servicing the RDF processing building vents air to the furnace so that odors will be incinerated.

   The dust control system should also vent the exhaust air into the furnace or it will defeat the purpose of the negative air system.

6. Dewatered ash from the furnaces will be carried by a conveyor system and discharged into open top ash trucks. Adequate precautions should be taken to prevent emissions of this material to the ambient air (material should be kept moist or covered).

7. Access roads should be paved to reduce dust emissions.

8. Land clearing material generated during site preparation should be land-filled and not burned.

9. Unconfined emissions of particulate matter as described in Chapter 17-2.610(3), FAC shall be adequately controlled during site preparation and plant construction.

Sincerely,

For the Division Director
Environmental Sciences and Engineering

Eugene J. Sacco, Administrator
Air Pollution, Solid and
Hazardous Waste Control

FJG/EJS/sc

STATE OF FLORIDA

hrs DEPARTMENT OF Bob Graham, Governor

Health & Rehabilitative Services

District Nine
P. O. Box 29

Palm Beach County Health Dept.
West Palm Beach, Florida 33402

Please Address
Reply to: ESE-WPB

August 19, 1985

Hamilton S. Oven, Jr., P.E.
Administrator
Siting Coordination Section
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Dear Mr. Oven:

Below are comments inadvertantly omitted from our letter of August 15, 1985, regarding the Palm Beach County Resource Recovery Plant (PA 84-20).

10. According to Appendix 10.14.7, proposed wells for the City of Riviera Beach P.W.S. are within 1 mile of the proposed interceptor wells for the new facility at Site 7. The six interceptor wells will have a combined maximum withdrawal of 3.2 MGD for cooling, boiler and irrigation purposes, as well as creating a hydraulic barrier, should the liner system fail in the immediate area, and to recover existing leachate under the site.

    In view of this fact, several points need further clarification and/or investigation:

    - Is it possible to relocate the proposed Riviera Beach Wells?
    - If relocation is not possible, what will be the permitted, daily (or monthly) withdrawal of these PWS wells, and will their "cones of influnce" supersede that of the interceptor wells?
    - If leachate is detected in a monitoring well, and there happens to be a pump failure at the inteceptor well, will there be back-up pumps available?

Sincerely,

For the Division Director
Environmental Sciences and Engineering

Eugene J. Sacco, Administrator
Air Pollution, Solid and
Hazardous Waste Control

FJG/EJS/sc

Letter Dated August 22, 1985

ITEM 1: Volume IV - Air Quality, page 2, paragraph 1.4 states the "Palm Beach County is in attainment with all NAAQB". It should be noted that Palm Beach County has been officially designated non-attainment for the pollutant ozone and that the plans to construct subject facility should be prepared accordingly.

RESPONSE: In Volume IV - Air Quality, Page 2, Paragraph 1.4, noted that the county was in attainment based on the most recent information available (Palm Beach County Health Department's Annual Report, 1983). It went on to note that the U.S. Environmental Protection Agency did not consider the County to be in compliance with regards to ozone until the County completed a monitoring program which was ongoing during the preparation of the Air Quality Volume.

With definitive information now available that the County is in non-attainment, the following non-attainment review is offered.

Nonattainment Review

If a proposed major stationary source will emit pollutants for which the area in which it is to be located has been designated non-attainment, the source is exempt from the Prevention of Significant Deterioration (PSD) review for those specific pollutants which are in non-attainment. This source, however, must meet the applicable requirements of New Source Review (NSR) for each pollutant that is in nonattainment. Additionally, the Lowest Achievable Emission Rate (LAER) for each affected pollutant with the possibility of offset requirements may be applicable.

It is noted that non-attainment requirements do not apply to every new source; rather, they apply on a "per pollutant" basis. The test of applicability is whether or not the affected pollutant has an emission rate that exceeds 100 tons per year.

The regulated pollutant for which Palm Beach County is in non-attainment is ozone. The indicator pollutant relative to emissions for ozone is non-methane hydrocarbons.

In accordance with Table 4-1, Controlled Emission Factors for the RDF Fired Spreader Stoker Furnaces, page 19, Volume IV - Air Quality, volatile organic compounds (VOC) are projected to be emitted at the rate of 65.6 tons per year for three operational furnaces. Under these circumstances, the non-attainment review is not required since the annual emissions are less than 100 tons per year.

The ambient air quality modeling in Volume IV - Air Quality, Table 5-9F, page 67, has shown that a maximum Highest Second-Highest (HSH) 3 hour average for VOC will be 1.6 ugm^{-3} at a distance of only 770 meters from the source's nearest boundary line (730 meters). This impact is only 1% of the VOC guideline value of 160 ugm^{-3} (for a 3 hour impact average between the hours of 0600-0900). The maximum modelled impact was found during the 3 hour time interval from 1200-1500. It may be assumed, therefore, that VOC emissions from the refuse derived fuel will not make a significant contribution to the formation of oxidants (ozone) in and/or around Palm Beach County.

Letter Dated August 22, 1985

ITEM 2: Volume IV - Air Quality, page 16. Where will the CO monitor be located?

RESPONSE: The location of the CO monitor has been specified in Volume I of the Application, Chapter 3, Section 3.4.1.4.4.5, page 3-25. The CO monitors will be located in the gas outlets of each boiler prior to any heat traps or air pollution control devices as further referenced in Chapter 5, Section 5.6.2, page 5-18.

Letter Dated August 22, 1985

ITEM 3: Volume IV, page 18 states that the SO_2 emissions factor, used in calculating the facilities emissions, is based only on the sulfur content of RDF.

Volume IV, page 23 states that auxiliary fuel is used during start-up and shut-down and will constitute 1.25% of the heat input to each furnace and either No. 2 oil or natural gas will be used as the auxiliary fuel.

Volume I, Section 3-11 indicates that auxiliary burners will be used to assist the combustion process when refuse is wet or otherwise difficult to burn.

Volume I, Section 3-8 suggests that landfill gas may be used as a source of auxiliary fuel.

It should be determined what the auxiliary fuel will be, what the amount consumed will be, and what the actual sulfur content of this fuel will be.

Auxiliary fuel usage may prove to be a significant source of SO_2 and should be examined more closely.

RESPONSE: Auxiliary fuel is provided to the furnaces for start-up and on rare occasions for use in the afterburner. Furnaces firing RDF would not be expected to be shut down more often than two or three times a year, and in practice the percentage of auxiliary fuel would not be expected to exceed a fraction of 1%. For conservative design calculation purposes 1.25% is used.

It is expected that landfill gas would be available from Dyer Boulevard Landfill for a period up to 10 years after closure and, thus, would be the natural choice for the auxiliary fuel. If

circumstances are such that landfill gas is not available to the resource recovery plant, either #2 fuel oil or natural gas would be used. Both are available, and natural gas would be the preferred fuel if the cost of installation for the gas line is not prohibited. This will be determined during the design phase.

Whichever fuel is selected, there would be little or no effect on SO_2 emissions. Natural gas supplied locally contains no sulphur, #2 fuel oil has a maximum sulphur content of 0.3%, and landfill gas generally contains approximately 0.01% sulphur. RDF has a sulphur content of approximately 0.2%, which is about the same as #2 fuel oil, while the content in landfill and natural gas is substantially less.

Letter Dated August 22, 1985

ITEM 4: Volume I, Section 2-10 states that should a total combustion shutdown occur, the RDF processing line would continue to operate until the RDF stockpile exceeded storage capacity (2 to 3 days).

If a total combustion shutdown occurred, the negative air system utilized in the storage area would not be able to vent the odors to the furnace for incineration as originally intended.

Is an alternative method of odor abatement to be employed during total combustion shutdown?

RESPONSE: The Authority plans call for the construction of a combustion facility adjacent to the RDF manufacturing plant which will reduce odors by taking combustion air from the refuse storage areas. When the combustion units are down, roofs vents will ventilate the storage areas.

The majority of the RDF manufacturing plants in this country ventilate odors to the outside because they do not have combustion facilities attached or adjacent to them. The odors outside the manufacturing and storage areas of these plants are "none" to "very minor" and "none" at the property line.

Letter Dated August 22, 1985

ITEM 5: The dust control system used on the RDF processing line is currently designed to vent exhaust air directly to the outside environment.

The negative air system servicing the RDF processing building vents air to the furnace so that odors will be incinerated.

The dust control system should also vent the exhaust air into the furnace or it will defeat the purpose of the negative air system.

RESPONSE: The dust control system on a particular process line in the RDF manufacturing area is only in operation when that line is processing refuse. To connect furnace combustion air systems to the dust control systems would be quite complicated and unbalanced. The amount of air needed for combustion is only a fraction of what would be used for both odor and dust control.

Letter Dated August 22, 1985

ITEM 6: Dewatered ash from the furnaces will be carried by a conveyor system and discharged into open top ash trucks. Adequate precautions should be taken to prevent emissions of this material to the ambient air (material should be kept moist or covered).

RESPONSE: The dewatered ash is conveyed to dump trucks in an enclosed area. The ash is quite wet, with a 35% to 40% moisture content, and does not pose a dust problem.

Letter Dated August 22, 1985

ITEM 7: Access roads should be paved to reduce dust emissions.

RESPONSE: As stated in the Response to the Department of Environmental Regulation Letter of July 2, 1985, Item No. 14, the Solid Waste Authority proposes to provide a bituminous prime coat on all permanent roadways on the construction site as early as possible to reduce potential particulate emissions. A comprehensive watering program will be the primary means of controlling particulate emissions on unpaved roadways.

Letter Dated August 22, 1985

ITEM 8: Land clearing material generated during site preparation should be landfilled and not burned.

RESPONSE: The land clearing material generated during site preparation may be disposed of in accordance with FAC 17-6, Open Burning, or by landfilling. Land clearing material may be burned with approval from the Fire Marshal's office and the Palm Beach County Health Department. During the construction of the Resource Recovery Facility, the Solid Waste Authority shall comply with current requirements of the regulatory agencies for the disposal of land clearing material.

Since controlled open burning of land clearing debris is a common and approved process in Palm Beach County, the Authority fails to see any reason not to avail itself of the opportunity to utilize this practice. Land preparation for this project is no different from any other development project in the County. Additionally, controlled open burning of land clearing debris will save in Class III landfill space. Consequently, the Solid Waste Authority will be pursuing appropriate authorization to engage in controlled open burning of the land clearing debris generated during site development.

Letter Dated August 22, 1985

ITEM 9: Unconfined emissions of particulate matter as described in Chapter 17-2.610(3), FAC shall be adequately controlled during site preparation and plant construction.

RESPONSE: During site preparation and other plant construction, good construction practices shall be used to minimize particulate emissions. The Authority has watering tankers, and a watering program shall be used as needed.

Letter Dated August 22, 1985

ITEM 10: According to Appendix 10.14.7, proposed wells for the City of Riviera Beach P.W.S. are within 1 mile of the proposed interceptor wells for the new facility at Site 7. The six interceptor wells will have a combined maximum withdrawal of 3.2 MGD for cooling, boiler and irrigation purposes, as well as creating a hydraulic barrier, should the liner system fail in the immediate area, and to recover existing leachate under the site.

In view of this fact, several points need further clarification and/or investigation:

a) Is it possible to relocate the proposed Riviera Beach Wells?
b) If relocation is not possible, what will be the permitted, daily (or monthly) withdrawal of these PWS wells, and will their "cones of influence" supersede that of the interceptor wells?
c) If leachate is detected in a monitoring well, and there happens to be a pump failure at the interceptor well, will there be back-up pumps available?

RESPONSE: a) The locations of the proposed Riviera Beach wells were chosen by the City of Riviera Beach. We are not in a position to examine alternative well locations for the City.

b) At this time it is not known what the actual permitted withdrawal rates will be. The withdrawal rates will be determined by the South Florida Water Management District. To the best of our knowledge, the daily withdrawal rate from the nine wells (five of these are proposed) will be about 3 mgd (million

gallons per day), as stated in Appendix 10.4 (Proposed Plan for the Recovery and Use of Ground Water by Pumping at the Dyer Boulevard and the Proposed Site 7 Landfills) of the Application.

The City of Riviera Beach currently operates four wells in the subject area; five more are proposed. The five proposed Riviera Beach wells are expected to pump 5/9ths of 3 mgd, or 1.66 mgd. Under average conditions of water availability, the cones of depression caused by the interceptor wells and the Riviera Beach wells will not significantly interfere with each other. The interceptor wells will cause a drawdown in the proposed Riviera Beach wells of 0.4 feet or less. Figure 6 in the cited report shows that a ground water divide between the two well fields will persist.

c) Pump failure in any interceptor well can be remedied in a matter of days. The groundwater flow rate in the vicinity of the interceptor wells will be on the order of one foot per day when the interceptor wells are operating. Therefore, only minor uncontrolled ground water flow would occur in the vicinity of the failed well during a period of pump failure.

PALM BEACH COUNTY
SOLID WASTE AUTHORITY

November 13, 1985

Mr. Claire H. Fancy
Central Air Permitting Section
Bureau of Air Quality Management
State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Re: Federal PSD Permitting Procedures

Dear Mr. Fancy:

As referenced in Department correspondence to this office, dated August 27, 1985, the USEPA has taken the position that the requirements of the Florida Electrical Power Plant Siting Act (PPSA) are not fully compatible with federal regulations, particularly with regard to federal PSD review and permitting. Consequently, the USEPA maintains that a source which obtains certification pursuant to the PPSA must additionally obtain a valid PSD permit before construction may commence. Hopefully, FDER and USEPA will be able to rectify this glitch in the PPSA certification process. In the meantime however, applicants such as the Authority are subjected to an unnecessary degree of uncertainty and confusion in attempting to ensure that the appropriate permits and authorizations are properly sought.

In accordance with the recommendations of the Bureau of Air quality Management, the Palm Beach County Solid Waste Authority hereby formally requests that the Department perform the Technical and Administrative PSD review and that its comments be forwarded to the USEPA for consideration in the issuance of a federal PSD permit. It is hoped that this request will facilitate a coordinated PSD review and expediate USEPA permit issuance.

If you have any questions or comments regarding this request, please call.

Sincerely,

Thomas R. Keith
Director
Environmental Programs

DER
NOV 19 1985
BAQM

TRK/ja
cc: Mr. Winston Smith, USEPA
Mr. Mike Schenk, Barker, Osha & Anderson
Mr. Stan Timmerman, Hayden/Wegman
Mr. Buck Oven, FDER

5114 Okeechobee Blvd. / Suite 2C / West Palm Beach, Florida 33409 / Telephone (305) 471-5770

DER

OCT 0 3 1985

BAQM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA GEORGIA 30365

OCT 0 3 1985

REF: 4APT-AP

Mr. Clair Fancy
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: PSD-FL-108 Palm Beach County Solid Waste Resource Recovery Faciltiy

Dear Mr. Fancy:

This is to acknowledge receipt of your July 2, 1985, submittal of the above referenced company's application for a Power Plant Siting Act certification. We have reviewed the application and found insufficient data to adequately review the modeling portion of the application. Therefore, we request that you send us copies of the model options printouts for each model run as well as the input parameters for these runs.

In regard to our review of the engineering analysis portion of the application, the emissions estimates and control technology were discussed with Mr. Ed Svec of your staff. EPA-Region IV is in agreement with Mr. Svec's assessment of emissions estimates and controls for this refuse derived fuel fired resource recovery facility. We, therefore, concur on the engineering analysis portion of the application. Concurrence on the modeling portion is being withheld until verification of the modeling procedure can be made by our meteorologist. However, no problems were discovered in our review of the modeling summaries of the predicted ambient impacts contained within the application.

In addition to the above, we notified Mr. Timothy F. Hunt, Executive Director of the Palm Beach County Solid Waste Authority, by letter dated September 17, 1985, that certification of this proposed facility under the Florida Power Plant Siting Act does not constitute a federal PSD permit. We further informed Mr. Hunt that EPA and the Florida DER are presently contemplating methods through which the source may receive a federal PSD permit. A copy of this correspondence has been forwarded to your office.

If you have any questions or comments regarding this matter, please contact Mr. Wayne J. Aronson, Leader, Program Support Team, at 404/881-4901.

Sincerely yours,

Bruce P. Miller

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DER
SEP 20 1985
BAQM

SEP 17 1985

REF: 4APT-AP

Mr. Timothy F. Hunt
Executive Director,
Palm Beach County
Solid Waste Authority
West Palm Beach, Fl. 33409

RE: Palm Beach County Solid Waste Resource Recovery Facility

Dear Mr. Hunt:

On November 22, 1983, the EPA approved Florida's Prevention of Significant Deterioration (PSD) regulations as part of the federally approved State Implementation Plan (SIP), Florida Administrative Code §17.2-500, thereby transferring to Florida the legal authority to process and issue PSD permits to sources in Florida which are required to obtain PSD permits. However, EPA recently became aware that, due to a conflict between the language of the Florida Electrical Power Plant Siting Act (PPSA), Public Health Code §§403.501-403.519, and that of the PSD regulations in the Florida SIP, EPA's approval of the PSD regulations as part of the SIP is void as to sources which are subject to the PPSA. Therefore, a source which obtains certification pursuant to the PPSA is still required to obtain a valid PSD permit before constructing or modifying.

We understand that Florida is currently processing, under the PPSA, a request by the Palm Beach County Solid Waste Authority to construct a solid waste resource recovery facility which shall generate electric power from combustion of refuse derived fuel and recover recyclable materials. This is to notify you that any such certification issued by Florida does not abrogate your responsibility to obtain a federal PSD permit. Construction of the source without a valid PSD permit will be considered a violation of the Clean Air Act and subject your facility to enforcement action.

We are currently engaged in discussions with the Florida Department of Environmental Regulation (DER) regarding courses of action that would enable a source subject to the PPSA to apply for a federal PSD permit with the DER. One possible solution currently under consideration by the DER and EPA involves placing the responsibility for the technical and administrative portions of the federal PSD review with the DER and the responsibility for issuance of the PSD permit with EPA.

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	Initial / Date
Clair	
2. Send copy to Buck Oven & Steve when return to me	Initial / Date
3. Sent 9/26	Initial / Date
4.	Initial / Date

REMARKS:

Edsvee - for file

INFORMATION

- Review & Return
- Review & File
- Initial & Forward

DISPOSITION

- Review & Respond
- Prepare Response
- For My Signature
- For Your Signature
- Let's Discuss
- Set Up Meeting
- Investigate & Report
- Initial & Forward
- Distribute
- Concurrence
- For Processing
- Initial & Return

FROM: Steve Smallwood

DATE

PHONE

There are a number of legal considerations which must be addressed before the current situation is resolved. EPA will keep you informed of all developments.

In the meantime, you or your representatives may call our office to discuss the current status of these discussions. If you have any questions regarding this letter, or information on how to apply for a PSD permit, please feel free to contact Mr. Wayne Aronson, Team Leader, Program Support Team at 404/881-4901.

Sincerely Yours,

Winston Smith, Director
Air, Pesticides & Toxics Division

cc:
Mr. Steve Smallwood, Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee

To: Ed Svec Loctn.: _____
To: _____ Loctn.: _____
To: _____ Loctn.: _____
From: _____ Date: _____

Reply Optional [ ] Reply Required [ ] Info. Only [ ]
Date Due: _____ Date Due: _____

TO: Hamilton Oven

FROM: Clair Fancy

DATE: August 23, 1985

SUBJ: Palm Beach County Resource Recovery Facility - Sufficiency Review

Listed below are questions my staff has prepared to be submitted to the applicant. These questions need to be answered before final review of the application can be completed.

1. Submit a copy of the appropriate sections of the references used to devise the emission factors for all the pollutants emitted by the proposed facility.

2. Provide documentation that an electrostatic precipitator (ESP) will remove 99% of sulfuric acid mist at an exit gas temperature of 450 °F.

3. The emission factor for dioxins appears to be based on the emission factor for the Brooklyn Navy Yard project which will use a dry scrubber and baghouse for control. What is the emission factor when an ESP is used as the only control device.

4. Wet scrubbers were not evaluated in the BACT because they produced an "aesthetically undesirable water vapor plume." Provide all the appropriate evaluations of wet scrubbers for the proposed BACT.

5. The proposed BACT compares an ESP to a dryscrubber and baghouse. This is not a valid comparison. Submit the necessary data comparing a baghouse to an ESP and a dryscrubber with a baghouse to scrubber with an ESP.

6. A BACT economic analysis which evaluates unit cost per ton of pollutant removed should include all the pollutants; for example, dry scrubbers should address acids, SO_2 etc. Resubmit the economic data for all of the control systems which are to be evaluated.

7. Will any hospital waste or "red bag" waste be incinerated at this facility. If so, please quantify the amounts, composition, and the source of these materials.

8. Verify and correct, if necessary, the tons per year emissions contained in the air permit application.

9. Tables 5-9 A through F of appendix 10.1.5 contain results of the highest, second high modeled concentrations for the proposed facility. These results include values at a distance of 730 meters from the center of the facility. The modeled runs, however, do not include any receptors at this distance. Please explain.

10. EPA informed us very recently that The Power Plant Act is not totally compatable with their rules and they are going to rescind our delegation of sources subject to PSD PPS. The county needs to be informed of such and they must send a letter to me requesting that we perform the Technical and Administrative review for EPA so that they can issue a federal PSD permit.

TR/ks