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BUREAU OF AIR REGULATION

April 26, 2004

Ms. Teresa Heron  
Engineer, Permitting South Section  
Bureau of Air Regulation  
Division of Air Resource Management  
Florida Department of Environmental Protection  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 32399-2400

RE: Solid Waste Authority of Palm Beach County (SWA)  
North County Resource Recovery Facility, FID No. 0990234  
Lime and Biosolids Facilities Air Construction (PSD) and Title V Permit  
Modification Applications  
PSD No. / PPSA No.: PSD-FL-108(F) / PA 84-20  
Title V Permit No. 0990234-003-AV

Dear Ms. Heron:

This letter is to provide written confirmation of telephone conversations and email correspondence that you had in March with Cynthia Hibbard of CDM. SWA requests that FDEP waive the required processing time for PSD permit modification application and to proceed again with the Prevention of Significant Deterioration (PSD) permit when we have resolved the issues listed below. SWA would also like to request that FDEP suspend processing of the Title V application. SWA will submit a revised and updated Title V application either as part of the Title V permit renewal or after start-up of the Lime and/or Biosolids Facilities. We understand that this will be treated in FDEP's system as a withdrawal of the Title V permit application.

For the PSD permit modification application SWA plans to revise at least one proposed metals emissions rate for the Biosolids Pelletization Facility based on better sludge metals concentration data than was available in the permit application; and SWA is considering revising the proposed particulate matter (PM) emissions rate for the Lime Recalcination Facility.

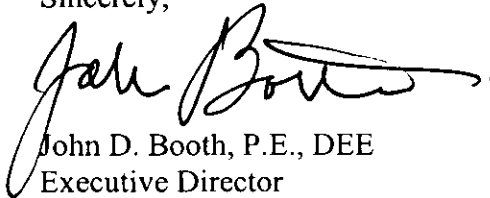
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This second issue came up because of a change between the draft and final NESHAP for Lime Manufacturing Plants, 40 CFR 63 Subpart AAAAA. The final Rule, published January 5, 2004 (after the October submittal of the PSD permit modification application), contains new language in Section 63.7081(a) that exempts lime manufacturing facilities that only process sludge containing calcium carbonate from water softening processes. Since the SWA's Lime Recalcination Facility would only receive calcium carbonate lime sludge from water treatment plants, this change in language excludes SWA's Lime Recalcination Facility from the applicability of the NESHAP.

The Lime Recalcination Facility PM emission rate in the PSD application was proposed to meet the draft NESHAP limit of 0.1 lb PM / ton of stone feed and is much more stringent than the still applicable limit of 0.6 lb PM / ton of stone feed in the NSPS (40 CFR 60 Subpart HH). SWA is evaluating, but has not yet decided, whether or not they would like to request that the Lime Recalcination Facility PM emission rate be changed to be closer to the NSPS limit.

We very much appreciate your working with us through the air permit process and expect to send our permit application revisions to you shortly.

Sincerely,



John D. Booth, P.E., DEE  
Executive Director  
Solid Waste Authority of Palm Beach County

JDB/kal

Cc: Raymond H. Schauer, SWA  
Marc Bruner, SWA  
Patrick Carroll, SWA  
Alex Makled, CDM  
Cynthia Hibbard, CDM  
Jill Grimaldi, CDM