

TO: Elizabeth Bartlett

FROM: Scott M. Sheplak, P.E. *SM*  
Administrator, Title V Section

DATE: February 17, 2000

SUBJECT: Solid Waste Authority of Palm Beach County  
ID Number: 0990234  
North County Resource Recovery Facility

City of Tampa  
ID Number 05700127  
McKay Bay Refuse-to-Energy Facility

Please find enclosed the subject Title V application for your review and information. Please return the application when you are done.

If you have any questions or comments concerning this matter, please do not hesitate to call me at 850/921-9532.

SS/bjb

Enclosure



YOUR PARTNER FOR  
SOLID WASTE SOLUTIONS

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FEB 02 2000

January 28, 2000

BUREAU OF AIR REGULATION

Mr. Scott Sheplak  
Professional Engineer Administrator  
Title V Section, Air Resources Division  
Florida Department of Environmental Protection  
2600 Blair Stone Road MS 5510  
Tallahassee, FL 32399-2400

Re: Solid Waste Authority of Palm Beach County - North County Resource  
Recovery Facility Draft Title V Permit

Dear Mr. Sheplak,

The Solid Waste Authority of Palm Beach County (SWA) has completed the review of the draft Title V permit from the Department for the North County Resource Recovery Facility (NCRRF). We have the following comments in addition to those transmitted on November 24, 1999 and January 4, 2000.

**1) Section I., Subsection A. Facility Description., Last sentence of this section:** This section indicates that the facility (based on its Title V application) is not a major source of HAPs. This is not true for hydrogen chloride (HCl). At 25 ppmv, the potential for HCl emissions is well over the 10 tons per year major threshold. The revised Title V permit application submitted by the Solid Waste Authority on September 30, 1999 identified the NCRRF as a major source of HAPs.

**2) Page 6, Section III., Subsection A., A.1.0,** Specific Condition 13 of the PSD-FL-108A permit requires that "lbs./hr. of steam produced, corrected for pressure and temperature, shall be continuously monitored and recorded on a 4 hour block average. In order to be consistent with PSD-FL-108A, we suggest that a footnote be added to the table in A.1.0 to note that the 324,000 lbs./hr. is a 4 hour average.

**3) Page 9, Section III. Emission Unit(s) and Conditions., Subsection A., Conditions A.4.7, and A.4.8:**

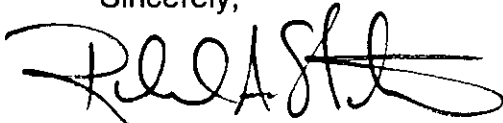
Conditions A.4.7 and A.4.8 are setting 3% for tires and 5% C&D/other waste as limits. We cannot find any regulatory basis in the Florida Administrative Code or the EPA regulations for this limitation. This limitation should be correctly referenced or removed.

**4) Page 40, Section III. Emission Unit(s) and Conditions., Subsection B.1.(a)(1),** The requirement that an amended design capacity report be submitted if there is any increase in the design capacity of the landfill does not appear to be consistent with 40 CFR 60.757(a)(3). The CFR requires the submission of an amended design capacity report in the event that a landfill increases its design capacity to or above 2.5 million megagrams and 2.5 million cubic meters. This subsection should be changed to be consistent with 40CFR 60.757(a)(3).

**5) Page 40, Section III. Emission Unit(s) and Conditions., Subsection B.1.(a)(2),** The first two words of this section should be replaced with "when an" to be consistent with 40 CFR 60.752(a)(2).

The SWA looks forward to your response to these comments. If you have any questions or comments, please do not hesitate to contact us.

Sincerely,



Richard A. Statom  
Assistant Director  
Environmental Programs

Cc. D. Lockhart, SWA  
M. Hammond, SWA  
M. Bruner, SWA  
J. Booth, SWA  
J. Mesojedec, SWA  
B. Worobel, SWA  
R. Schauer, Malcolm Pirnie



## Draft Permit 0990234-001-AV

- 25 • **Page 5, Section II, 9. Dust, odor and run-off, 3<sup>rd</sup> sentence:** This sentence prohibits discharges of “liquid effluents or contaminated run-off from the plant site”. The SWA is requesting that this sentence be removed from the Title V permit. This requirement cannot be found in either the referenced PA 84-20 nor in the PSD-FL-108A. Also, the SWA believes that it is inappropriate to have such a requirement in an air operating permit.
- 26 • **Page 6, A.1.0 Permitted Capacity:** The referenced rules 62-4.160(2) and 62-210.228(PTE), F.A.C. do not seem to match the context. The SWA requests that this section be properly cited.
- 27 • **Page 7, A.1.2 Emissions Unit Operating Rate Limitation After Testing:** Rule 62-297.310(2), F.A.C. refers to “Operating Rate During Testing”. There seems to be a discrepancy with the word “after” and “during” in this permit condition. The SWA requests that this section be properly worded.
- 26 • **Pages 7 – 9, A.4.1-A.4.7:** These sections do not have any references. The SWA requests that these sections be properly cited.
- 24 • **Page 7, A.4.0 Methods of Operations-Fuel, 2<sup>nd</sup> sentence:** The 2<sup>nd</sup> sentence of this paragraph which requires the daily charging rates to be recorded cannot be found in the referenced Rule 62-213.410(1), F.A.C., PSD-FL-108A, or PA 84-20. The SWA requests the reference for this requirement.
- 30 • **Page 9, A.5 Hours of Operation, 2<sup>nd</sup> Sentence:** The 2<sup>nd</sup> sentence of this paragraph cannot be found in the referenced PSD-FL-108A. The SWA requests that this item be confirmed and properly cited.
- 31 • **Page 10, A.6 Stack Emissions:** Written sections for emission limits of VOC, Beryllium, and Fluoride have been omitted and only exist in a table format (Table 1-1). A permitting note indicates that Table 1-1 “summarizes information for convenience purpose only... and does not supersede any of the terms or conditions of this permit”. SWA requests that the emission limits for VOC, Beryllium, and Fluoride be clearly cited in the Title V permit.
- 32 • **Page 12, A.18 Nitrogen Oxides:** It appears that the time factor and averaging calculation for this emission limit have been omitted. The SWA requests that the following language be added to this section “calculated as an arithmetic average. Averaging time is a 24-hour block average”.
- 33 • **Page 12, A.19 Carbon Monoxide:** The 400 ppmvd corrected to 7% O<sub>2</sub>, 1 hour block average has been omitted from this permit (PSD-FL-108A).

- 34 • **Page 13, E.3.3:** The reference for the 2<sup>nd</sup> sentence that defines malfunction has been omitted. The language of this sentence is from PSD-FL-108A. The SWA requests that the proper citation be added to this section.
- 35 • **Page 13, E.4:** The wording of this sentence does not completely match the language in Rule 62-210.700(4), F.A.C. It appears that the words "startup, shutdown, or" have been omitted after the word during and prior to the word malfunction.
- 36 • **Page 36, R.16:** The 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> sentences of this section cannot be found in the referenced rule 62-213.440, F.A.C. The SWA requests that the language be verified and the correct rule or permit be cited.
- 37 • **Page 38, R.21:** The last sentence of this paragraph reads "Malfunction shall be defined in Specific Condition A.9. This reference A.9 is the emission limit for Cadmium on page 10 of this draft permit. The correct citation for malfunction should be E.3.3. of this permit.
- 38 • **Pages 40 – 58, Subsection B, Class I and Class III Landfills:** It appears that the March 12, 1996 version of 40 CFR 60 Subpart WWW, Standards for air emissions from municipal solid waste landfills is being used throughout the draft permit. This rule was modified on June 16, 1998. The SWA requests that the modified version of subpart www be incorporated into or be referenced in the Title V permit.
- 39 • Lastly, the draft Title V permit does not address the following items for the landfill gas flares that are currently in the PSD-FL-108(D) permit: (a) the 1800 scfm flow rate for each flare, (b) measuring flow rate with totalizing meter, and (c) the annual analysis and reporting of sulfur content and exit velocity of each flare. The SWA requests that these items either be incorporated into or be clearly referenced in the Title V permit.