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DIVISION OF AIR  
RESOURCE MANAGEMENT

September 13, 2011

Mr. Jonathan Holtom, P.E.  
Program Administrator  
Title V Section  
Division of Air Resource Management  
Florida Department of Environmental Protection  
Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: North County Resource Recovery Facility  
*Revised Draft/Proposed Permit No. 0990234-020-AV, Title V Operation Permit  
Renewal  
Revised Draft Permit No. 099234-019-AC/PSD-FL-108I, Air Construction Permit  
Revision  
Solid Waste Authority (SWA) of Palm Beach County  
Comments on Revised Draft Permits*

Dear Mr. Holtom:

On behalf of the SWA, Camp Dresser & McKee Inc. (CDM) is submitting comments on the Revised Draft Title V Air Operation Permit Renewal and Air Construction Permit Revision, for which public notice was published on August 20, 2011. We understand that due to comments submitted on the Draft permits, and some substantial changes to those permits, it has been necessary to withdraw the Draft permits and replace them with these revised permits. We greatly appreciate the Department's efforts in preparing the revised draft permit, and the opportunity to provide the comments, below.

- 1) Revised Draft/Proposed Permit, Page III.A.-5, Condition A.21. We request that the second sentence be revised to read: "The Department authorizes three hours per occurrence for these emissions units." The PSD permit (PSD-FL-108A) that was issued in 1992 states, on Page 10 of 11; Specific Condition 15, that excess emissions shall be limited to "three hours per occurrence." Since the "three hours per occurrence" language was part of the underlying PSD



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permit for the SWA's facility, the Department cannot reduce the authorized emissions to three hours in a 24 hour period when the Department renews the Title V permit for the SWA's facility. (See email from David Dee to Scott Sheplak, re: SWAPBC Title V Permit, dated August 24, 2011.)

- 2) Revised Draft/Proposed Permit, Page III.A.-7, Condition A.29. We request that the language describing the annual basis for HCl testing be changed to match the language in the underlying 1992 PSD permit (PSD-FL-108A) that states, in Specific Condition 4. on Page 7 of 11, that each unit shall be tested annually. That is, please delete the parenthetical phrase, "(no more than 12 calendar months following the previous performance test)." This interpretation will apply until the U.S. EPA corrects Subpart Eb to include HCl and fugitive ash testing on a calendar year basis, no less than 9 calendar months and no more than 15 calendar months following the previous performance test.
- 3) Revised Draft/Proposed Permit, Page III.D.-7, Condition D.12 Emissions Limitations Permitting Note. The " $\leq$ " should be correct to a " $>$ ", so that the category refers to "existing" stationary CI engines with  $>$  500 HP.
- 4) Revised Draft/Proposed Permit, Page III.D.-17, Condition D.58. Please correct the name of this engine to be "Emergency Generator – Biosolids Pelletization Facility (BPF) (EPA Tier 3 certified)." The E.U. ID No 016 is correct, and the applicable emissions standards are correct for the BPF engine generator.
- 5) Appendix CAM, Page CAM-5 of 5. The footnote at the bottom of the page states that the excursion level shall be re-evaluated at the time of permit renewal, based upon the most recent stack test data and the manufacturer's recommendations. We request that this be added as a Permitting Note to Condition C.21 on Page III.C.-3 in the main body of the permit.
- 6) Appendix 40 CFR 61 Subpart M [Set A]. We request that a permitting note be added to this appendix to indicate that the NESHAP 40 CFR 61, Subpart M conditions only apply to the asbestos site at the Class III Landfill (and not to the Class I and Class III Flares).

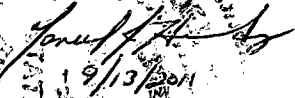


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Thank you again, and please contact either Cynthia Hibbard (617-452-6244;  
[hibbardcs@cdm.com](mailto:hibbardcs@cdm.com)) or me (561-689-3336; [hernandezmj@cdm.com](mailto:hernandezmj@cdm.com)) with any questions

you have.

Very truly yours,

  
19/13/2011  
Manuel J. Hernandez, P.E.  
Florida Professional Engineer No. 59796  
Senior Project Manager  
Camp Dresser & McKee Inc.

MJH/aat

Enclosure

File: 2678-78434.07.01

cc: Mr. Scott Sheplak, FDEP  
Mr. Mark Hammond, SWA  
Mr. Marc Bruner, SWA  
Mr. Mark McLean, SWA  
Mr. Bob Worobel, SWA  
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Ms. Mary Beth Morrison, SWA  
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