



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

April 8, 2009

*Sent by Electronic Mail – Received Receipt Requested*

Mr. Mark Hammond, Executive Director and Authorized Representative  
Solid Waste Authority of Palm Beach County  
7501 North Jog Road  
West Palm Beach, Florida 33412

Re: Request for Additional Information  
Project No. 0990234-015-AC/PSD-FL-108H  
Siting's Conditions of Certification No. PA 84-20  
North County Resource Recovery Facility (NCRRF)  
Authorization to Refurbish Municipal Solid Waste Combustors (MSWC) Nos. 1 and 2

Dear Mr. Hammond:

On March 9, 2009, we received your application for an air construction permit to refurbish MSWC Nos. 1 and 2 at the existing NCRRF located 7501 North Jog Road in Palm Beach, Palm Beach County, Florida. On March 26<sup>th</sup> we received supplemental information regarding the application. The application indicates that the project is subject to general preconstruction review pursuant to Rule 62-210.300 of the Florida Administrative Code (F.A.C.). The application is considered to be incomplete. In order to continue processing your application, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Provide the calculations and methodology for the baseline and projected actual emissions in accordance with Rules 62-210.200(36)(a) and 62-210.370, F.A.C. Provide all calculations, data used, source of the data and assumptions to derive these emissions. Also, update and resubmit any appropriate application pages, appendices and tables.
2. As an existing electric utility steam generating unit and pursuant to the definitions at Rule 62-210.200(36)(a), F.A.C. for "Baseline Actual Emissions", the consecutive 24-month period for the baseline period must be between the years 2004 and 2008. Therefore, for particulate matter, MSWC metals, volatile organic compounds, hydrogen fluoride, mercury and MSWC organics, a different 24-month period will need to be selected since you used the year 2003 as part of the 24-month period.
3. The supplemental information received on March 26<sup>th</sup> included revised baseline emissions, but did not include projected actual emissions. You must include projected actual emissions based on your expected operation of these units in the future. Please use the methods contained in Rules 62-210.200(250) and 62-210.370, F.A.C. to determine the activity factor and the projected actual emissions. Provide all calculations, data used, source of the data and assumptions to derive these emissions. Also, update and resubmit any appropriate application pages, appendices and tables.
4. For the proposed baghouse control system, what is the design flow rate and outlet grain loading (gr/dscf)?
5. For the proposed SNCR control system, what are the approximate number of injectors, number of levels of injectors, approximate location of the injectors and approximate temperature at these locations?
6. For the proposed activated carbon injection control system, what is the approximate maximum expected carbon injection rate at baseload? Will there be a baghouse control system associated with the activated carbon silo? If so, please provide the outlet grain loading and flow rate. How will the carbon injection rate be controlled?
7. For the proposed combustion control system, please explain how the transport air will be separated from the RDF before charging.
8. Some comments were provided by the Palm Beach County Health Department. They have been attached, not restated. Please address their comments.

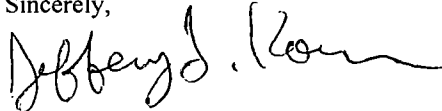
## REQUEST FOR ADDITIONAL INFORMATION

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The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction review); and 62-212.400 (Preventions of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact the project engineer, Bruce Mitchell, at (850)413-9198.

Sincerely,



Jeffery F. Koerner, Administrator  
New Source Review Section

This letter was sent to the following people by electronic mail with received receipt requested.

cc: Mr. Mark Hammond, Solid Waste Authority of Palm Beach County ([mhammond@swa.org](mailto:mhammond@swa.org))  
Mr. Christopher C. Tilman, P.E., Malcolm Pirnie, Inc. ([ctilman@pirnie.com](mailto:ctilman@pirnie.com))  
Mr. Don Elias, RTP Environmental ([elias@rtpenv.com](mailto:elias@rtpenv.com))  
Mr. Michael Halpin, Siting Coordination Office ([mike.halpin@dep.state.fl.us](mailto:mike.halpin@dep.state.fl.us))  
Mr. James Stormer, Palm Beach County Health Department ([james\\_stormer@doh.state.fl.us](mailto:james_stormer@doh.state.fl.us))  
Mr. Lennon Anderson, Southeast District Office ([lennon.anderson@dep.state.fl.us](mailto:lennon.anderson@dep.state.fl.us))  
Ms. Vickie Gibson, DEP BAR Reading File ([victoria.gibson@dep.state.fl.us](mailto:victoria.gibson@dep.state.fl.us))

JFK/rbm

Attachment

**Mitchell, Bruce**

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**From:** Laxmana\_Tallam@doh.state.fl.us  
**Sent:** Tuesday, March 24, 2009 3:40 PM  
**To:** Mitchell, Bruce  
**Cc:** James\_Stormer@doh.state.fl.us  
**Subject:** RE: Solid Waste Authority of Palm Beach County - 0990234-015-AC

**Bruce:**

Below are my observations from this project application.

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**NSPS applicability:**

Subpart 60.51b defines 'modification' as "... Increases in the amount of any air pollutant emitted by the MWC unit are determined at **100-percent physical load capability** and downstream of all air pollution control devices, with **no consideration given for load restrictions based on permits or other nonphysical operational restrictions** (emphasis mine)."

*The SWA states that once the project is completed, all PSD pollutants are expected to be less than baseline actual emissions. To be conservative, the facility estimated the projected actual emissions to be < (base line emissions + significant increase). (Page 17 of 178 -- pdf document).*

*In Section G, the application states that use of vendor estimates resulted in higher expected actual emissions for PM, PM10, mercury, SO2, acid gases than the base line emissions. (Page 166 of 178).*

1. It appears that the emissions increase may be below significant emission increase (at worst case scenario) to escape PSD review. However, any increase in the pollutant emitted by the MWC will trigger modification according to NSPS.
2. Facility must maintain the record of actual emissions for next 5 years. Does any increase trigger NSPS retroactively?
2. It appears that the vendor estimates result in increase of expected actual emissions. Does this trigger NSPS? What are the factors guaranteed by the vendors? What are the detailed calculations for expected actual emissions?
3. Can the facility calculate the future emissions at 100-percent physical load without considering any permit limits?
4. The facility has two allowable emissions per most pollutants (section F2 of the application). One is based on the NSPS limit, and the other is based on the projected actual emissions. How does the facility demonstrate compliance with the latter, and does it include the emissions from startup/shutdown/malfunction?
5. For SO2, projected actual emissions shown are > allowable emissions.

Thanks for the opportunity to comments on this project.

~Laxmana

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Laxmana Tallam, PE  
Palm Beach County Health Department  
561-355-3136 ext 1142

4/8/2009

## Walker, Elizabeth (AIR)

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**From:** Mark Hammond [mhammond@swa.org]  
**Sent:** Thursday, April 09, 2009 9:37 AM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** RE: RAI - Solid Waste Authority of Palm Beach County (0990234-015-AC/PSD-FL-108H)

I have received the document.

MarkH

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**From:** Walker, Elizabeth (AIR) [mailto:Elizabeth.Walker@dep.state.fl.us]  
**Sent:** Wednesday, April 08, 2009 5:20 PM  
**To:** Mark Hammond  
**Cc:** Mitchell, Bruce; Koerner, Jeff; ctilman@pirnie.com; elias@rtpenv.com; Halpin, Mike; James\_Stormer@doh.state.fl.us; Anderson, Lennon; Gibson, Victoria  
**Subject:** RAI - Solid Waste Authority of Palm Beach County (0990234-015-AC/PSD-FL-108H)

Dear Sir/Madam:

**Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".** We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html> .

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

*Elizabeth Walker*  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
(850)921-9505

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.*

**Walker, Elizabeth (AIR)**

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**From:** Tilman, Christopher [CTilman@PIRNIE.COM]  
**To:** Walker, Elizabeth (AIR)  
**Sent:** Wednesday, April 08, 2009 10:53 PM  
**Subject:** Read: RAI - Solid Waste Authority of Palm Beach County (0990234-015-AC/PSD-FL-108H)

Your message

To: [CTilman@PIRNIE.COM](mailto:CTilman@PIRNIE.COM)  
Subject:

was read on 4/8/2009 10:53 PM.

**Walker, Elizabeth (AIR)**

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**From:** Donald F. Elias [elias@rtpenv.com]  
**Sent:** Wednesday, April 08, 2009 5:38 PM  
**To:** Walker, Elizabeth (AIR)  
**Subject:** Read: RAI - Solid Waste Authority of Palm Beach County (0990234-015-AC/PSD-FL-108H)  
**Attachments:** Read\_RAI - Solid Waste Authority of Palm Beach County (0990234-015-AC\_PSD-FL-108H).txt