

Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, Bureau of Air Regulation
FROM: Cleve Holladay and Jeff Koerner, New Source Review Section
DATE: April 27, 2009
SUBJECT: Extension of Air Construction Permit Expiration Date
Solid Waste Authority of Palm Beach County
Biosolids Pelletization Facility
Project No. 0990234-014-AC
Extension of Air Permit No. 0990234-006-AC/PSD-FL-108F

Attached for your approval and signature is a permit modification to extend the expiration date for the above referenced air permit. The extension until March 31, 2010 will allow sufficient time to complete the installation of a Biosolids Pelletization Facility. Most of the construction has been completed. The reason for the request is contractor delays in meeting the construction completion date in the previous construction permit extension.

Based on the circumstances and information provided, I recommend your approval and signature.

Attachment



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 27, 2009

Sent by Electronic Mail – Received Receipt Requested

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

Re: Extension of Air Construction Permit Expiration Date
Solid Waste Authority of Palm Beach County
Biosolids Pelletization Facility
Project No. 0990234-014-AC
Extension of Original Air Permit No. 0990234-006-AC/PSD-FL-108F

Dear Mr. Hammond:

On February 2, 2009, the Solid Waste Authority of Palm Beach County (SWA) requested an extension of the expiration date for the above referenced air construction permit for the North County Resource Recovery Facility site located in Palm Beach County at 7501 North Jog Road in West Palm Beach, Florida. Briefly, this project authorizes the construction of a biosolids pelletization facility. So far, most of the construction activities have been completed. However, SWA requests the additional time to complete remaining construction activities not met by the completion date established in the previous air construction permit extension. The request to extend the air construction permit was timely. Construction of this project commenced within 18 months of the approval to construct, and no break in construction greater than 18 months has occurred. The project is not a phased project requiring a re-evaluation of best available control technology (BACT). Based on the circumstances and information provided, the Department approves this request.

Determination: The expiration date is hereby extended from **March 31, 2009** to **March 31, 2010** to provide the necessary time to complete remaining authorized construction activities. This permitting action does not authorize any new construction. A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

EXTENSION OF AIR CONSTRUCTION PERMIT EXPIRATION DATE

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions must be filed within 14 days of receipt of this permit extension. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

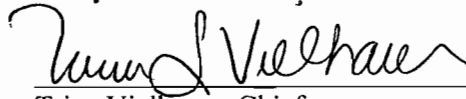
Mediation: Mediation is not available in this proceeding.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

EXTENSION OF AIR CONSTRUCTION PERMIT EXPIRATION DATE

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

TLV/jfk/cgh

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Extension of Air Construction Permit Date was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 4/27/09 to the persons listed below.

- Mr. Mark Hammond, Executive Director, Solid Waste Authority of Palm Beach County: mhammond@swa.org
- Ms. Amber M. Barritt, P.E., Camp Dresser & McKee: barrittam@cdm.com
- Mr. Lee Hoefert, P.E., DEP Southeast District Office: Lee.Hoefert@dep.state.fl.us
- Mr. James Stormer, Palm Beach County Health Department: James.Stormer@doh.state.fl.us
- Mr. Mike Halpin, P.E., DEP Siting Coordination Office: Mike.Halpin@dep.state.fl.us
- Ms. Kathleen Forney, Environmental Protection Agency Region 4: forney.kathleen@epa.gov
- Ms. Vickie Gibson, DEP BAR Reading File: victoria.gibson@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



(Clerk)

4/27/09
(Date)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Monday, April 27, 2009 4:42 PM
To: 'mhammond@swa.org'
Cc: 'barritam@cdm.com'; Hoefert, Lee; 'james_stormer@doh.state.fl.us'; Halpin, Mike; 'forney.kathleen@epa.gov'; Gibson, Victoria; Anderson, Lennon; 'Laxmana_Tallam@doh.state.fl.us'
Subject: SOLID WASTE AUTHORITY OF PBC/NCRRF; 0990234-014-AC - Extension

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0990234.014.AC.F_pdf.zip

Owner/Company Name: SOLID WASTE AUTHORITY OF PBC

Facility Name: SOLID WASTE AUTHORITY OF PBC/NCRRF

Project Number: 0990234-014-AC

Permit Status: FINAL - Extension

Permit Activity: CONSTRUCTION

Facility County: PALM BEACH

Processor: Bruce Mitchell

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. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Note: The attached 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>>.

Livingston, Sylvia

From: Mark Hammond [mhammond@swa.org]
Sent: Tuesday, April 28, 2009 8:09 AM
To: Livingston, Sylvia
Subject: RE: SOLID WASTE AUTHORITY OF PBC/NCRRF; 0990234-014-AC - Extension

I have received the document.

Mark Hammond

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Monday, April 27, 2009 4:42 PM
To: Mark Hammond
Cc: Amber Barritt of CDM; Hoefert, Lee; james_stormer@doh.state.fl.us; Halpin, Mike; forney.kathleen@epa.gov; Gibson, Victoria; Anderson, Lennon; Laxmana_Tallam@doh.state.fl.us
Subject: SOLID WASTE AUTHORITY OF PBC/NCRRF; 0990234-014-AC - Extension

Dear Sir/ Madam:

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Facility Name: SOLID WASTE AUTHORITY OF PBC/NCRRF
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Permit Status: FINAL - Extension
Permit Activity: CONSTRUCTION
Facility County: PALM BEACH
Processor: Bruce Mitchell

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Sylvia Livingston

Livingston, Sylvia

From: Barritt, Amber [BarrittAM@cdm.com]
Sent: Monday, April 27, 2009 4:44 PM
To: Livingston, Sylvia
Subject: RE: SOLID WASTE AUTHORITY OF PBC/NCRRF; 0990234-014-AC - Extension

Received and able to access the document. Thank you.

Best regards,

Amber M. Barritt, P.E.
Project Manager
CDM
1601 Belvedere Road, Suite 211 South
West Palm Beach, FL 33406
Phone: 561-689-3336
Fax: 561-689-9713
Email: barrittam@cdm.com

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Monday, April 27, 2009 4:42 PM
To: mhammond@swa.org
Cc: Barritt, Amber; Hoefert, Lee; james_stormer@doh.state.fl.us; Halpin, Mike; forney.kathleen@epa.gov; Gibson, Victoria; Anderson, Lennon; Laxmana_Tallam@doh.state.fl.us
Subject: SOLID WASTE AUTHORITY OF PBC/NCRRF; 0990234-014-AC - Extension

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Project Number: 0990234-014-AC
Permit Status: FINAL - Extension
Permit Activity: CONSTRUCTION
Facility County: PALM BEACH
Processor: Bruce Mitchell



1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
tel: 561 689-3336
fax: 561 689-9713

RECEIVED

MAR 23 2009

BUREAU OF AIR REGULATION

March 20, 2009

Mr. Syed Arif, P.E.
New Source Review Section
Florida Department of Environmental Protection
B2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility Site
Biosolids Pelletization Facility
Response to Incompleteness Letter, File No. 0990234-014-AC
Extension Request/DEP File No. 0900234-006-AC/PSD-FL-108F

Dear Mr. Arif:

SWA and CDM have received your Incompleteness Letter, dated February 26, 2009, requesting the following:

"The Department needs to make a determination that there was not a delay of more than 18 months in either commencing construction or any break in construction activities for all the air emission units that underwent modification. The determination cannot be made from the contractor's construction schedule in Attachment B of your request. Please provide this documentation."

In response to your request, we offer the following: construction activities for the Biosolids Pelletization Facility commenced in February 2007, which was within the 18-month requirement for construction to commence from permit issuance in April 2006. Construction has continued since February 2007, with no break in construction activities.

We hope that this supplemental information satisfies your request. Should you need additional information, or if you would like a copy of the Contractor's construction schedule from the commencement of construction activities, we would be happy to provide it. Please feel free to contact me at any time.

Very truly yours,

Amber M. Barritt, P.E.
Project Manager
Camp Dresser & McKee Inc.



Mr. Syed Arif, P.E.

March 20, 2009

Page 2

AMB/pa

cc: Mark Hammond, SWA (mhammond@swa.org)
Lee Hoefert, P.E., FDEP Southeast District Office (Lee.Hoefert@dep.state.fl.us)
James Stormer, Palm Beach County Health Department (James_Stormer@doh.state.fl.us)
Mike Halpin, P.E., FDEP Siting Coordination Office (Mike.Halpin@dep.state.fl.us)

File: 2678-46715-079



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

February 26, 2009

Electronically Sent - Received Receipt Requested

mhammond@swa.org

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

Re: Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility Site
Biosolids Pellitization Facility
Incompleteness Letter, File No. 0990234-014-AC
Extension Request/DEP File No. 0990234-006-AC/PSD-FL-108F

Dear Mr. Hammond:

The Department reviewed your request of February 2, 2009 to extend the expiration date of the above referenced construction permit from March 31, 2009 to March 31, 2010. The additional time will allow completion of construction of the Biosolids Pellitization Facility.

Per Rule 62-4.080(3), Florida Administrative Code (F.A.C.), an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

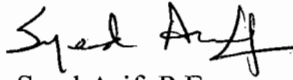
We already have fairly extensive information about the facility and the control equipment. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

The Department needs to make a determination that there was not a delay of more than 18 months in either commencing construction or any break in construction activities for all the emission units that underwent modification. The determination can not be made from the contractor's construction schedule in Attachment B of your request. Please provide this documentation.

According to Rule 62-4.080(3), F.A.C. the permit will remain in effect until the Department takes final action. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires

applicants to respond to requests for information within 90 days. If you have any questions regarding this matter, please call me at 850/921-9528 or Cleve Holladay at 850/921-8986.

Sincerely,



Syed Arif, P.E.

New Source Review Section

cc: Amber M. Barritt, P.E., Camp, Dresser & McKee: barrittam@cdm.com
Lee Hoefert, P.E., DEP-Southeast District Office: Lee.Hoefert@dep.state.fl.us
James Stormer, Palm Beach County Health Department: James_Stormer@doh.state.fl.us
Mike Halpin, P.E., DEP Siting Coordination Office: Mike.Halpin@dep.state.fl.us

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, February 25, 2009 5:27 PM
To: 'mhammond@swa.org'
Subject: RAI - Solid Waste Authority of Palm Beach County (0990234-014-AC)
Attachments: 0990234-014-AC letter.pdf

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> .

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, February 25, 2009 4:46 PM
To: 'barritam@cdm.com'
Cc: Hoefert, Lee; 'james_stormer@doh.state.fl.us'; Halpin, Mike; 'Laxmana_Tallam@doh.state.fl.us'; Walker, Elizabeth (AIR)
Subject: RAI - Solid Waste Authority of Palm Beach County (0990234-014-AC)
Attachments: 0990234-014-AC letter.pdf

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Tracking:

Livingston, Sylvia

From: Mark Hammond [mhammond@swa.org]
Sent: Thursday, February 26, 2009 11:26 AM
To: Livingston, Sylvia
Subject: RE: RAI - Solid Waste Authority of Palm Beach County (0990234-014-AC)

I have received the documents.

Mark Hammond

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Wednesday, February 25, 2009 5:27 PM
To: Mark Hammond
Subject: RAI - Solid Waste Authority of Palm Beach County (0990234-014-AC)

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).

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

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.

2/27/2009

Livingston, Sylvia

From: Hoefert, Lee
Sent: Thursday, February 26, 2009 7:58 AM
To: Livingston, Sylvia
Cc: Forrest, William; Anderson, Lennon
Subject: RE: RAI - Solid Waste Authority of Palm Beach County (0990234-014-AC)

Lee C. Hoefert, P.E.
 Air Program Permitting
 Florida Department of Environmental Protection
 Southeast District
 400 N. Congress Ave., Suite 200
 West Palm Beach, FL 33401
 561-681-6626(Phone), 561-681-6790(Fax)

More than 3,000 retail pharmacies in Florida are now a part of the Florida Discount Drug Card program. See www.FloridaDiscountDrugCard.com for more info or call toll-free, 1-866-341-8894.

From: Livingston, Sylvia
Sent: Wednesday, February 25, 2009 4:46 PM
To: 'barritam@cdm.com'
Cc: Hoefert, Lee; 'james_stormer@doh.state.fl.us'; Halpin, Mike; 'Laxmana_Tallam@doh.state.fl.us'; Walker, Elizabeth (AIR)
Subject: RAI - Solid Waste Authority of Palm Beach County (0990234-014-AC)

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Thank you,

Sylvia Livingston
 Bureau of Air Regulation
 Division of Air Resource Management (DARM)
 850/921-9506
sylvia.livingston@dep.state.fl.us

2/27/2009

Livingston, Sylvia

From: Barritt, Amber [BarrittAM@cdm.com]
Sent: Tuesday, March 03, 2009 4:30 PM
To: Livingston, Sylvia
Subject: RE: RAI - Solid Waste Authority of Palm Beach County (0990234-014-AC)

Good afternoon, Sylvia-

I have received the RAI and a response is forthcoming. Thanks.

Best regards,

Amber M. Barritt, P.E.
CDM
1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
Phone: 561.689.3336
Fax: 561.689.9713
Email: barrittam@cdm.com

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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,

Sylvia Livingston
Bureau of Air Regulation



1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
tel: 561 689-3336
fax: 561 689-9713

RECEIVED

FEB 02 2009

BUREAU OF AIR REGULATION

January 30, 2009

Mr. Scott M. Sheplak, P.E.
Title V Section
Florida Department of Environmental Protection
Bob Martinez Center
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399

Subject: Solid Waste Authority of Palm Beach County
North County Resource Recovery Facility Site
Biosolids Pelletization Facility
Supplement documents for time Extension Request for Air Construction
Permit (Permit No: 0990234-006-AC and PSD-FL-108F)

Dear Mr. Sheplak:

This letter is in reference to the Florida Department of Environmental Protection (FDEP) Air Construction Permit Number 0990234 and PSD-FL-108F for the construction of a Biosolids Pelletization Facility (BPF) at the North County Resource Recovery Facility Site. On April 28, 2008, the Solid Waste Authority of Palm Beach County received a letter from FDEP, approving the expiration date extension of the referenced permit from March 31, 2008 to March 31, 2009.

The project is designed as a single phase of construction. Construction has commenced, but the contractor was not able to meet the construction completion date established in the air construction permit extension. This letter serves to inform you that a permit application will be submitted to FDEP next week requesting a one-year extension for the air construction permit.

We would be happy to provide any additional information you may need to process this request once you have received the signed and sealed permit application. Please contact me at any time with such requests at (561) 689-3336 or barrittam@cdm.com.





Mr. Scott M. Sheplak, P.E.
January 30, 2009
Page 2

Very truly yours,

A handwritten signature in black ink that reads "Amber M. Barritt". The signature is written in a cursive style.

Amber M. Barritt, P.E.
Project Manager
Camp Dresser & McKee Inc.

AMB/wlb

c: Mark Hammond, SWA, via email mhammond@swa.org
Lee Hoefert, P.E., FDEP Southeast District Office, via email Lee.Hoefert@dep.state.fl.us
James Stormer, PBCHD, via email James_Stormer@doh.state.fl.us
Mike Halpin, P.E., FDEP Siting Coordination Office, via email Mike.Halpin@dep.state.fl.us
Gregg Worley, EPA, via email Worley.gregg@epa.gov

File: 2678-46715-079



1601 Belvedere Road, Suite 211 South
West Palm Beach, Florida 33406
tel: 561 689-3336
fax: 561 689-9713

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FEB 02 2009

BUREAU OF AIR REGULATION

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This letter is in reference to the Florida Department of Environmental Protection (FDEP) Air Construction Permit Number 0990234 and PSD-FL-108F for the construction of a Biosolids Pelletization Facility (BPF) at the North County Resource Recovery Facility Site. On April 28, 2008, the Solid Waste Authority of Palm Beach County received a letter from FDEP, approving the expiration date extension of the referenced permit from March 31, 2008, to March 31, 2009.

The project is designed as a single phase of construction. Construction has commenced, but the contractor was not able to meet the construction completion date established in the air construction permit extension. The contractor's current construction schedule indicates that construction should be completed by April 8, 2009. On behalf of the Solid Waste Authority, CDM hereby requests an additional one-year extension of the air pollution construction permit for the BPF.

Additionally, no design or construction changes have occurred to date that would affect the air emissions calculations or the Best Available Control Technology analysis previously submitted.

Transmitted herewith are:

- The first six pages of FDEP form 62-200.910(1), "Application Information," included as **Attachment A**.





Mr. Scott M. Sheplak, P.E.

January 30, 2009

Page 2

- The contractor's construction schedule, included as **Attachment B**, indicating that construction will be completed by April 8, 2009.

We would be happy to provide any additional information you may need to process this request. Please contact me at any time with such requests at (561) 689-3336 or barrittam@cdm.com.

Very truly yours,

Amber M. Barritt, P.E.

Project Manager

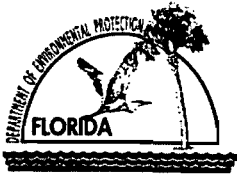
Camp Dresser & McKee Inc.

Attachments

cc: Mark Hammond, SWA, via e-mail mhammond@swa.org
Lee Hoefert, P.E., FDEP Southeast District Office, via e-mail Lee.Hoefert@dep.state.fl.us
James Stormer, PBCHD, via e-mail James_Stormer@doh.state.fl.us
Mike Halpin, P.E., FDEP Siting Coordination Office, via e-mail Mike.Halpin@dep.state.fl.us
Gregg Worley, EPA, via e-mail Worley.gregg@epa.gov

File: 2678-46715-079

ATTACHMENT A



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revised/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Solid Waste Authority of Palm Beach County	
2. Site Name: North County Resource Recovery Facility	
3. Facility Identification Number: 0990234	
4. Facility Location... Solid Waste Authority of Palm Beach County, North County Resource Recovery Facility Street Address or Other Locator: 7501 North Jog Road City: West Palm Beach County: Palm Beach Zip Code: 33412-2414	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Amber M. Barritt, P.E., Project Manager	
2. Application Contact Mailing Address... Organization/Firm: Camp Dresser & McKee Street Address: 1601 Belvedere Road, Suite 211 S City: West Palm Beach State: FL Zip Code: 33406	
3. Application Contact Telephone Numbers... Telephone: (561) - 689-3336 ext. Fax: (561) - 689-9713	
4. Application Contact Email Address: barrittam@cdm.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 2/2/05	3. PSD Number (if applicable):
2. Project Number(s): 0990234-0140	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is for one-year extension of the current air construction permit for the Biosolids Pelletization Facility

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
	Class I Landfill 3,500 scfm flare		
	Proposed 2,000 scfm flare (LRF/BPF)		
	Proposed 1,000 scfm flare (LRF/BPF)		

Application Processing Fee

Check one: Attached - Amount: \$ 0.00 Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Dan Pellowitz, Assistant to Executive Director
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412-2414
3. Owner/Authorized Representative Telephone Numbers... Telephone: (561) - 640-4000 Fax: (561) - 683-4067
4. Owner/Authorized Representative Email Address: dpellowitz@swa.org
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature 1/30/2009 Date

APPLICATION INFORMATION

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Dan Pellowitz, Assistant to Executive Director
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input checked="" type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Solid Waste Authority of Palm Beach County Street Address: 7501 North Jog Road City: West Palm Beach State: FL Zip Code: 33412
4. Application Responsible Official Telephone Numbers... Telephone: 561 - 640-4000 Fax: 561 - 683-4067
5. Application Responsible Official Email Address: dpellowitz@swa.org
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> Signature _____ Date <u>11/30/2009</u>

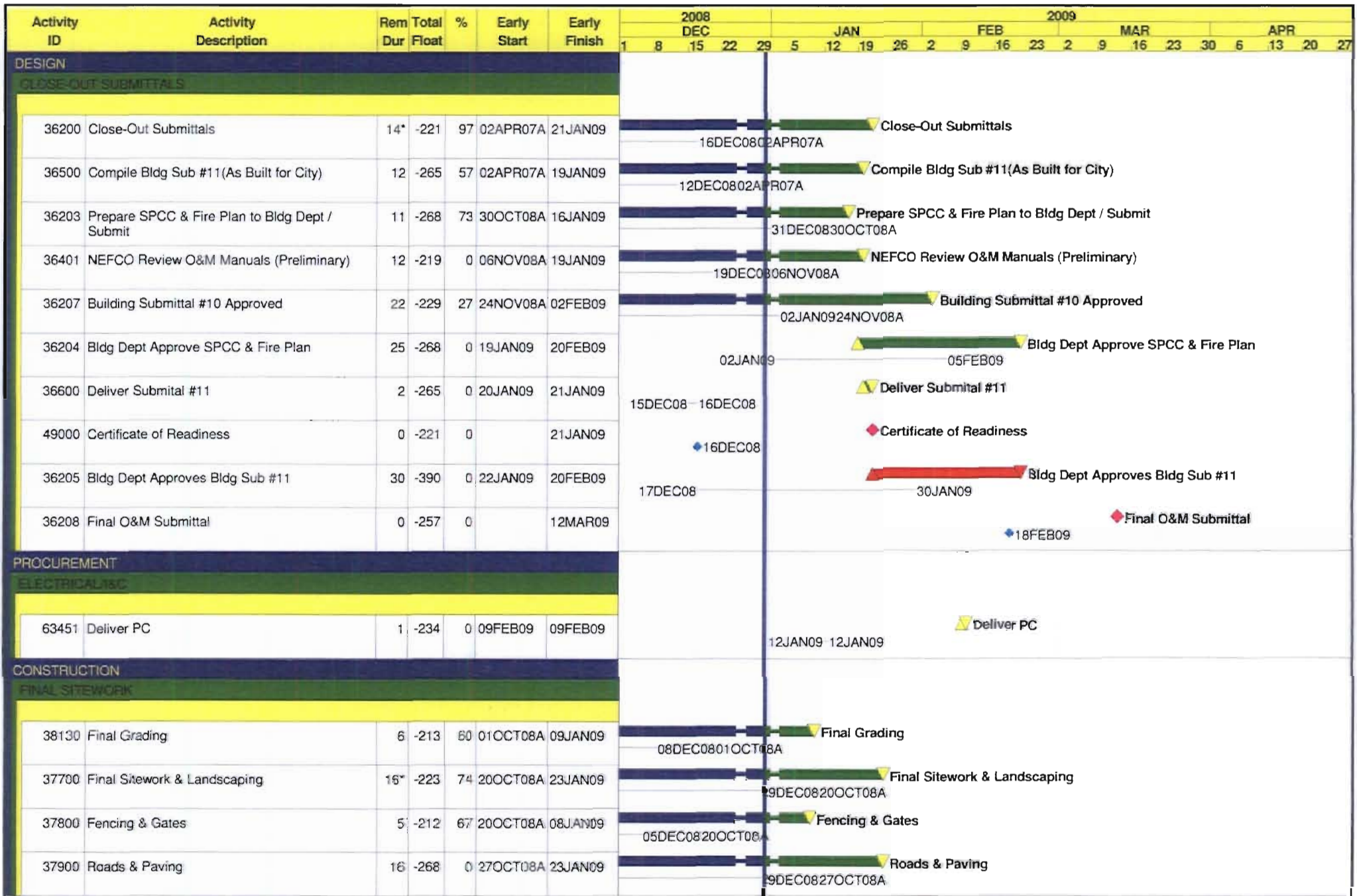
APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Amber M. Barritt, P.E. Registration Number: 66423
2. Professional Engineer Mailing Address... Organization/Firm: Camp Dresser & McKee Inc. Street Address: 1601 Belvedere Road, Suite 211 South City: West Palm Beach State: FL Zip Code: 33406
3. Professional Engineer Telephone Numbers... Telephone: 561 - 689-3336 Fax: 561 - 689-9713
4. Professional Engineer Email Address: barrittam@cdm.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature: <u>Amber M. Barritt</u> Date: <u>1/30/09</u> (seal)

* Attach any exception to certification statement.

ATTACHMENT B



Start Date	01JAN05		Early Bar
Finish Date	08APR09		Target Bar
Data Date	31DEC08		Progress Bar
Run Date	06JAN09 10:26		Critical Activity

WP35
 NEFCO-HDR-TURNER
 PBC-SWA BIOSOLIDS PROCESS FACILITY
 Remaining Schedule by Phase of Work

Sheet 1 of 17

Date	Revision	Checked	Approved

Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008												2009											
							DEC				JAN				FEB				MAR				APR							
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6	13	20	27		
38000	Sidewalks	15	-248	0	07NOV08A	22JAN09	 Sidewalks																							
38100	Landscaping	12	-245	40	10NOV08A	19JAN09	 Landscaping																							
STRUCTURAL STEEL/MISCELLANEOUS METALS																														
39425	Stairways & Handrails	15	-272	25	28APR08A	22JAN09	 Stairways & Handrails																							
39311	Equipment Screen Submittal	10	-242	0	13OCT08A	15JAN09	 Equipment Screen Submittal																							
39310	Fab/Del Equipment Screen	10	-242	0	16JAN09	29JAN09	 Fab/Del Equipment Screen																							
39300	Install Equipment Structure Screen	15	-242	0	30JAN09	19FEB09	 Install Equipment Structure Screen																							
ROOFING, DOORS, WINDOWS, FINISHES																														
40110	Paint Structural/Misc Metals	10	-242	78	27JUN08A	15JAN09	 Paint Structural/Misc Metals																							
39500	Roofing, Doors, Windows & Finishes	10*	-217	92	23JUL08A	15JAN09	 Roofing, Doors, Windows & Finishes																							
39700	Doors & Windows	10	-217	0	27OCT08A	15JAN09	 Doors & Windows																							
39620	Built-Up Roofing System South(Process)	5	-212	58	28OCT08A	08JAN09	 Built-Up Roofing System South(Process)																							
40100	Paint & Protective Coatings Mezzanine	4	-212	73	29OCT08A	08JAN09	 Paint & Protective Coatings Mezzanine																							
40000	Ceramic Tile & Vinyl Flooring	3	-212	40	30OCT08A	06JAN09	 Ceramic Tile & Vinyl Flooring																							
39900	Accoustical Ceiling	5	-212	0	17NOV08A	08JAN09	 Accoustical Ceiling																							
39800	Insulation, Flashing, Caulking & Sealing	5	-212	0	19NOV08A	08JAN09	 Insulation, Flashing, Caulking & Sealing																							
CARPENTRY, SPECIALITIES, FURNISHINGS																														
40200	Carpentry, Specialities & Furnishings	6*	-213	92	11SEP08A	09JAN09	 Carpentry, Specialities & Furnishings																							
40400	Cabinets / Millwork	5	-212	0	26NOV08A	08JAN09	 Cabinets / Millwork																							

Start Date	01JAN05		Early Bar
Finish Date	08APR09		Target Bar
Data Date	31DEC08		Progress Bar
Run Date	06JAN09 10:26		Critical Activity

WP35

NEFCO-HDR-TURNER

PBC-SWA BIOSOLIDS PROCESS FACILITY

Remaining Schedule by Phase of Work

Sheet 2 of 17

Date	Revision	Checked	Approved

Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008												2009													
							DEC			JAN				FEB			MAR			APR												
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6	13	20	27				
40500	Laboratory Equipment	2	-209	75	01DEC08A	05JAN09	Laboratory Equipment 19DEC08 10DEC08																									
40600	Toilet Partitions & Bath Accessories	6	-213	40	15DEC08A	09JAN09	Toilet Partitions & Bath Accessories 19DEC08 11DEC08																									
CASE RECEIVING STORAGE EQUIPMENT																																
41202	Details for Reclaimer Bin Modifications	7	-224	0	29DEC08A	12JAN09	Details for Reclaimer Bin Modifications																									
41201	Reinforce Reclaimer Bins (MIS)	10	-224	0	13JAN09	26JAN09	Reinforce Reclaimer Bins (MIS) 24DEC08 01OCT08A																									
PROCESS AREA EQUIPMENT																																
42800	Dust Collectors DC-101/201	4	-213	0	29APR08A	07JAN09	Dust Collectors DC-101/201 09DEC08 29APR08A																									
42700	Pellet Transporters PT-101/210	5	-214	0	29SEP08A	08JAN09	Pellet Transporters PT-101/210 09DEC08 29SEP08A																									
42900	Dust Collector Fans F-103/203	2	-214	0	09JAN09	12JAN09	Dust Collector Fans F-103/203 11DEC08 10DEC08																									
BUILDING SCRUBBER EQUIPMENT																																
43800	Building Scrubber Equipment	4*	-249	98	21MAR08A	07JAN09	Building Scrubber Equipment 04DEC08 21MAR08A																									
44200	Chemical Feed Pumps P-304/305	2	-273	0	31DEC08	05JAN09	Chemical Feed Pumps P-304/305 02DEC08																									
44300	Chemical / Acid Storage Tanks TA-305/6/7	2	-249	0	06JAN09	07JAN09	Chemical / Acid Storage Tanks TA-305/6/7 04DEC08 03DEC08																									
PRODUCT STORAGE EQUIPMENT																																
44400	Product Storage Equipment	7*	-263	95	25JUN08A	12JAN09	Product Storage Equipment 05DEC08 25JUN08A																									
44900	Dust Control Oil Tank & Pump	7	-263	0	29DEC08A	12JAN09	Dust Control Oil Tank & Pump 05DEC08																									
MISCELLANEOUS EQUIPMENT																																
45000	Misc. Equipment	5*	-256	97	12MAY08A	08JAN09	Misc. Equipment 03DEC08 12MAY08A																									
45500	Air Compressors	5	-256	0	22JUL08A	08JAN09	Air Compressors 02DEC08 22JUL08A																									

Start Date	01JAN05		Early Bar
Finish Date	08APR09		Target Bar
Data Date	31DEC08		Progress Bar
Run Date	06JAN09 10:26		Critical Activity

WP35
 NEFCO-HDR-TURNER
 PBC-SWA BIOSOLIDS PROCESS FACILITY
 Remaining Schedule by Phase of Work

Sheet 3 of 17

Date	Revision	Checked	Approved



Start Date	01JAN05	▶	Early Bar
Finish Date	08APR09	▶	Target Bar
Data Date	31DEC08	▶	Progress Bar
Run Date	06JAN09 10:26	▶	Critical Activity

WP35
 NEFCO-HDR-TURNER
 PBC-SWA BIOSOLIDS PROCESS FACILITY
 Remaining Schedule by Phase of Work

Date	Revision	Checked	Approved

Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008												2009											
							DEC					JAN				FEB			MAR				APR							
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6	13	20	27		
48160	Conduit, Wire & Term Mech/Press Room	8	-269	60	12NOV08A	13JAN09	Conduit, Wire & Term Mech/Press Room 08DEC08 12NOV08A																							
48070	Pull/Term RTO-CP to J Box	8	-269	0	19NOV08A	13JAN09	Pull/Term RTO-CP to J Box 04DEC08 19NOV08A																							
48090	Terminations RTO 1&2 CP to J Box	2	-269	33	19DEC08A	13JAN09	Terminations RTO 1&2 CP to J Box 18DEC08 05DEC08																							
47630	Energize Transformer #2 (FPL)	5	-267	0	19JAN09	23JAN09	Energize Transformer #2 (FPL) 31DEC08 07JAN09																							
47680	Install Transformer #1/Pull Feeders/Term (FPL)	15	-257	0	19JAN09	06FEB09	Install Transformer #1/Pull Feeders/Term (FPL) 15JAN09 04FEB09																							
48100	Loop Check Instruments	10	-255	0	20JAN09	02FEB09	Loop Check Instruments 02JAN09 15JAN09																							
47690	Energize Transformer #1 (FPL)	0	-257	0		06FEB09	Energize Transformer #1 (FPL) 04FEB09																							
47650	Permanent Power	2	-257	0	09FEB09	10FEB09	Permanent Power 11FEB09 12FEB09																							

ELECTRICAL COMPLETE - Dryer Feeds to Motors

Electrical Complete Activities

48102	Dryer Feed System	8	-269	0	06OCT08A	13JAN09	Dryer Feed System 10DEC08 06OCT08A																							
48103	Dryer System	13	-274	0	06OCT08A	20JAN09	Dryer System 19DEC08 06OCT08A																							
48104	Post Dryer System	11	-272	0	06OCT08A	16JAN09	Post Dryer System 15DEC08 06OCT08A																							
48108	Fuel System	13	-274	0	06OCT08A	20JAN09	Fuel System 19DEC08 06OCT08A																							
48109	Bldg Odor Scrubber System	6	-267	0	07OCT08A	09JAN09	Bldg Odor Scrubber System 17DEC08 07OCT08A																							
48106	Cooling Water System	2	-263	33	13OCT08A	05JAN09	Cooling Water System 01DEC08 13OCT08A																							
48117	Plant Control System	22	-268	0	20OCT08A	02FEB09	Plant Control System 31DEC08 20OCT08A																							
48115	Water Systems	6	-267	0	22OCT08A	09JAN09	Water Systems 16DEC08 22OCT08A																							
48101	Sludge Load in & Storage System	13	-274	0	28OCT08A	20JAN09	Sludge Load in & Storage System 17DEC08 28OCT08A																							
48107	Filter Press System	11	-272	0	28OCT08A	16JAN09	Filter Press System 15DEC08 28OCT08A																							

Start Date	01JAN05		Early Bar
Finish Date	08APR09		Target Bar
Date Date	31DEC08		Progress Bar
Run Date	06JAN09 10:26		Critical Activity

WP35
NEFCO-HDR-TURNER
PBC-SWA BIOSOLIDS PROCESS FACILITY
Remaining Schedule by Phase of Work

Sheet 5 of 17

Date	Revision	Checked	Approved

Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008					2009													
							DEC					JAN			FEB			MAR			APR				
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6
48105	Dryer Emissions System	13	-274	0	31OCT08A	20JAN09																			
48111	Compressed Air & Nitrogen System	6	-267	75	25NOV08A	09JAN09																			
START UP & TESTING																									
<i>All Work installed</i>																									
SU008	Cooling water system	0	-253	0	06JAN09																				
SU011	Building Odor scrubber system	0	-257	0	12JAN09																				
SU012	Compressed air and nitrogen systems	0	-268	0	12JAN09																				
SU016	Water systems	0	-261	0	12JAN09																				
SU004	Dryer feed system	0	-263	0	14JAN09																				
SU015	HVAC system	0	-255	0	14JAN09																				
SU009	Filter press system	0	-263	0	19JAN09																				
SU020	Landscaping complete	0	-251	0	20JAN09																				
SU003	Sludge load in and storage system	0	-268	0	21JAN09																				
SU005	Dryer system	0	-268	0	21JAN09																				
SU007	Dryer emissions system	0	-268	0	21JAN09																				
SU010	Fuel systems	0	-268	0	21JAN09																				
SU006	Post dryer system	0	-274	0	26JAN09																				
SU021	"Handicapped signs, stripping and other features	0	-255	0	26JAN09																				
SU018	Plant control system	0	-261	0	03FEB09																				

Start Date	01JAN05		Early Bar
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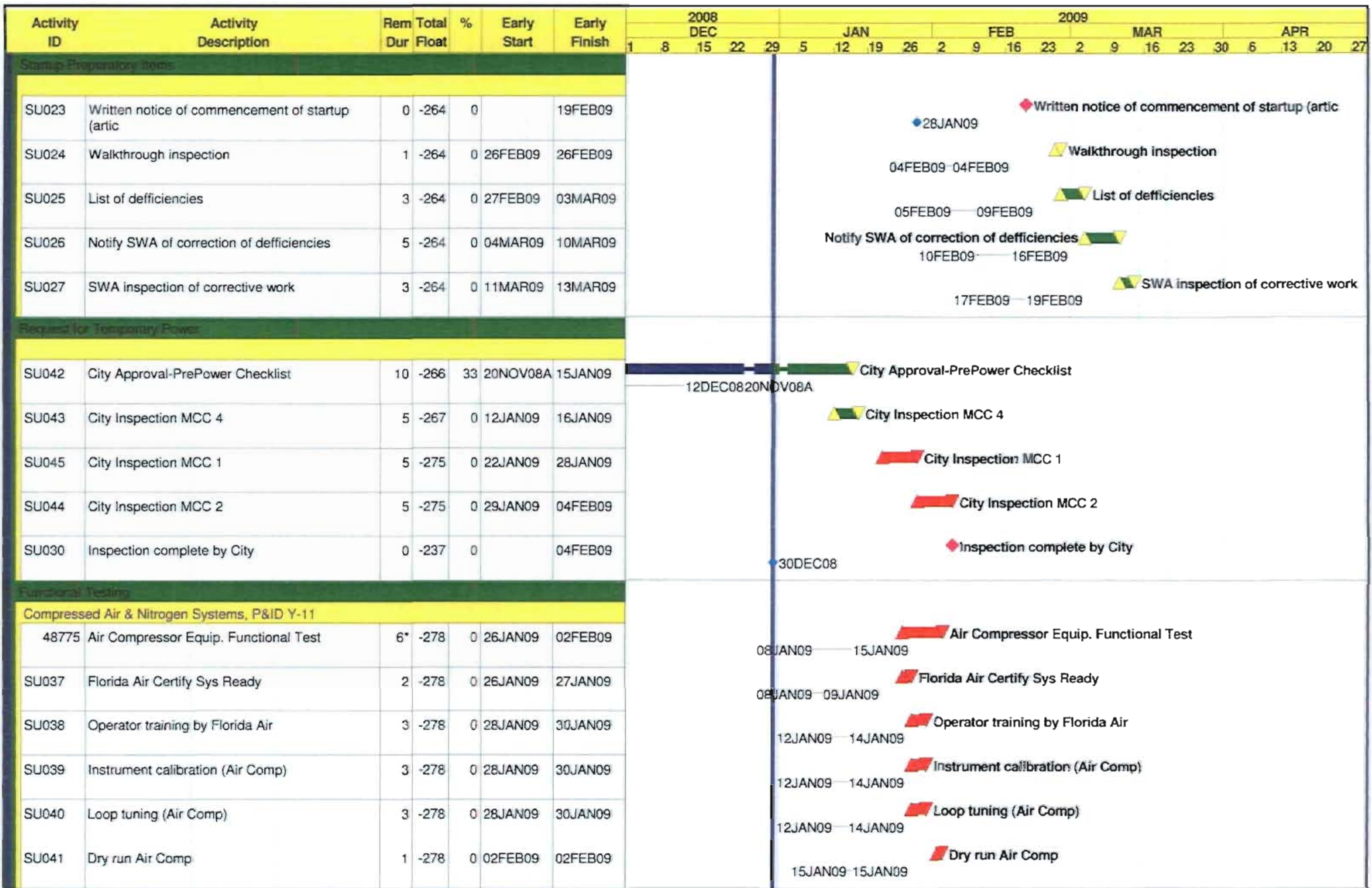
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Start Date	01JAN05		Early Bar
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Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008				2009																	
							DEC				JAN				FEB				MAR				APR					
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6	13	20	27
Cooling Water System, P&ID Y-08																												
48745	Cooling Tower & Pump Functional Test	4*	-275	0	05FEB09	10FEB09													13JAN09	—	16JAN09		Cooling Tower & Pump Functional Test					
SU067	Evapco Certify Sys Ready	1	-275	0	05FEB09	05FEB09													13JAN09	—	13JAN09		Evapco Certify Sys Ready					
SU068	Operator training by Evapco	2	-275	0	06FEB09	09FEB09													14JAN09	—	15JAN09		Operator training by Evapco					
SU069	Instrument calibration (Cooling Twr)	2	-275	0	06FEB09	09FEB09													14JAN09	—	15JAN09		Instrument calibration (Cooling Twr)					
SU070	Loop tuning (Cooling Twr)	2	-275	0	06FEB09	09FEB09													14JAN09	—	15JAN09		Loop tuning (Cooling Twr)					
SU071	Dry run Cooling Twr	1	-275	0	10FEB09	10FEB09													16JAN09	—	16JAN09		Dry run Cooling Twr					
Conveyance Systems, P&ID Y-02, Y-03A&B																												
48720	Conveyence Equip. Functional Test	8*	-282	0	10FEB09	19FEB09													19JAN09	—	28JAN09		Conveyence Equip. Functional Test					
SU079	TPI Certify Sys Ready	2	-282	0	10FEB09	11FEB09													19JAN09	—	20JAN09		TPI Certify Sys Ready					
SU080	Operator training by TPI	5	-282	0	12FEB09	18FEB09													21JAN09	—	27JAN09		Operator training by TPI					
SU081	Instrument calibration (Conveyance)	5	-282	0	12FEB09	18FEB09													21JAN09	—	27JAN09		Instrument calibration (Conveyance)					
SU082	Loop tuning (Conveyance)	5	-282	0	12FEB09	18FEB09													21JAN09	—	27JAN09		Loop tuning (Conveyance)					
SU083	Dry run Conveyance Systems	1	-282	0	19FEB09	19FEB09													28JAN09	—	28JAN09		Dry run Conveyance Systems					
Dryer System, P&ID Y-04																												
48710	Dryer Equip. Functional Test	8*	-280	0	06FEB09	17FEB09													13JAN09	—	22JAN09		Dryer Equip. Functional Test					
SU085	Baker Rullman Certify Sys Ready	2	-280	0	06FEB09	09FEB09													13JAN09	—	14JAN09		Baker Rullman Certify Sys Ready					
SU086	Operator training by Baker Rullman	5	-280	0	10FEB09	16FEB09													15JAN09	—	21JAN09		Operator training by Baker Rullman					
SU087	Instrument calibration (Dryer)	5	-280	0	10FEB09	16FEB09													15JAN09	—	21JAN09		Instrument calibration (Dryer)					
SU088	Loop tuning (Dryer)	5	-280	0	10FEB09	16FEB09													15JAN09	—	21JAN09		Loop tuning (Dryer)					
SU089	Dry run Dryer	1	-280	0	17FEB09	17FEB09													22JAN09	—	22JAN09		Dry run Dryer					

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							DEC				JAN				FEB				MAR				APR					
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6	13	20	27
SU099	Instrument calibration (RTO)	5	-280	0	10FEB09	16FEB09								Instrument calibration (RTO)														
SU100	Loop tuning (RTO)	5	-280	0	10FEB09	16FEB09								Loop tuning (RTO)														
SU101	Dry run RTO	1	-280	0	17FEB09	17FEB09								Dry run RTO														
Filter Press System, P&ID Y-08																												
48785	Press/Polymer Feed Syst. Functional Test	5*	-276	0	05FEB09	11FEB09								Press/Polymer Feed Syst. Functional Test														
SU103	Beckart Certify Sys Ready	1	-276	0	05FEB09	05FEB09								Beckart Certify Sys Ready														
SU104	Operator training	3	-276	0	06FEB09	10FEB09								Operator training														
SU105	Instrument calibration	3	-276	0	06FEB09	10FEB09								Instrument calibration														
SU106	Loop tuning	3	-276	0	06FEB09	10FEB09								Loop tuning														
SU107	Dry run system	1	-276	0	11FEB09	11FEB09								Dry run system														
Chemical Feed System																												
48765	Chemical Feed Pumps Functional Test	3*	-274	0	05FEB09	09FEB09								Chemical Feed Pumps Functional Test														
SU201	Chemical Feed Certify Sys Ready	1	-274	0	05FEB09	05FEB09								Chemical Feed Certify Sys Ready														
SU202	Operator training for Chem Feed	1	-274	0	06FEB09	06FEB09								Operator training for Chem Feed														
SU203	Instrument calibration (Chem Feed)	1	-274	0	06FEB09	06FEB09								Instrument calibration (Chem Feed)														
SU204	Loop tuning (Chem Feed)	1	-274	0	06FEB09	06FEB09								Loop tuning (Chem Feed)														
SU205	Dry run Chem Feed	1	-274	0	09FEB09	09FEB09								Dry run Chem Feed														
Electrical System																												
SU116	Electrical Certify Sys Ready	2	-280	0	05FEB09	06FEB09								Electrical Certify Sys Ready														
SU117	Operator training on Electrical Sys	2	-280	0	09FEB09	10FEB09								Operator training on Electrical Sys														
SU118	System calibration and tuning (Electrical)	3	-280	0	11FEB09	13FEB09								System calibration and tuning (Electrical)														

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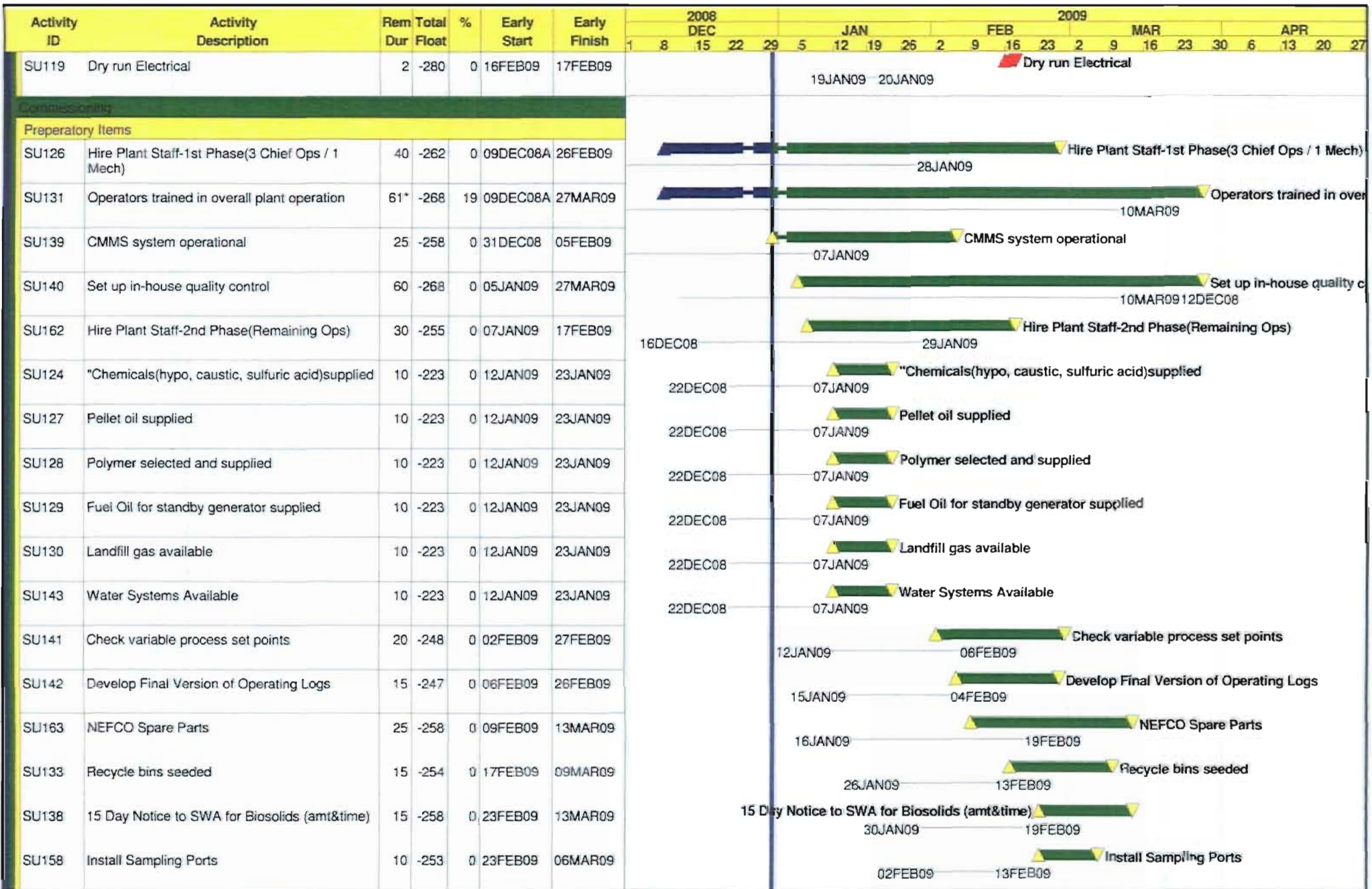
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Start Date	01JAN05		Early Bar
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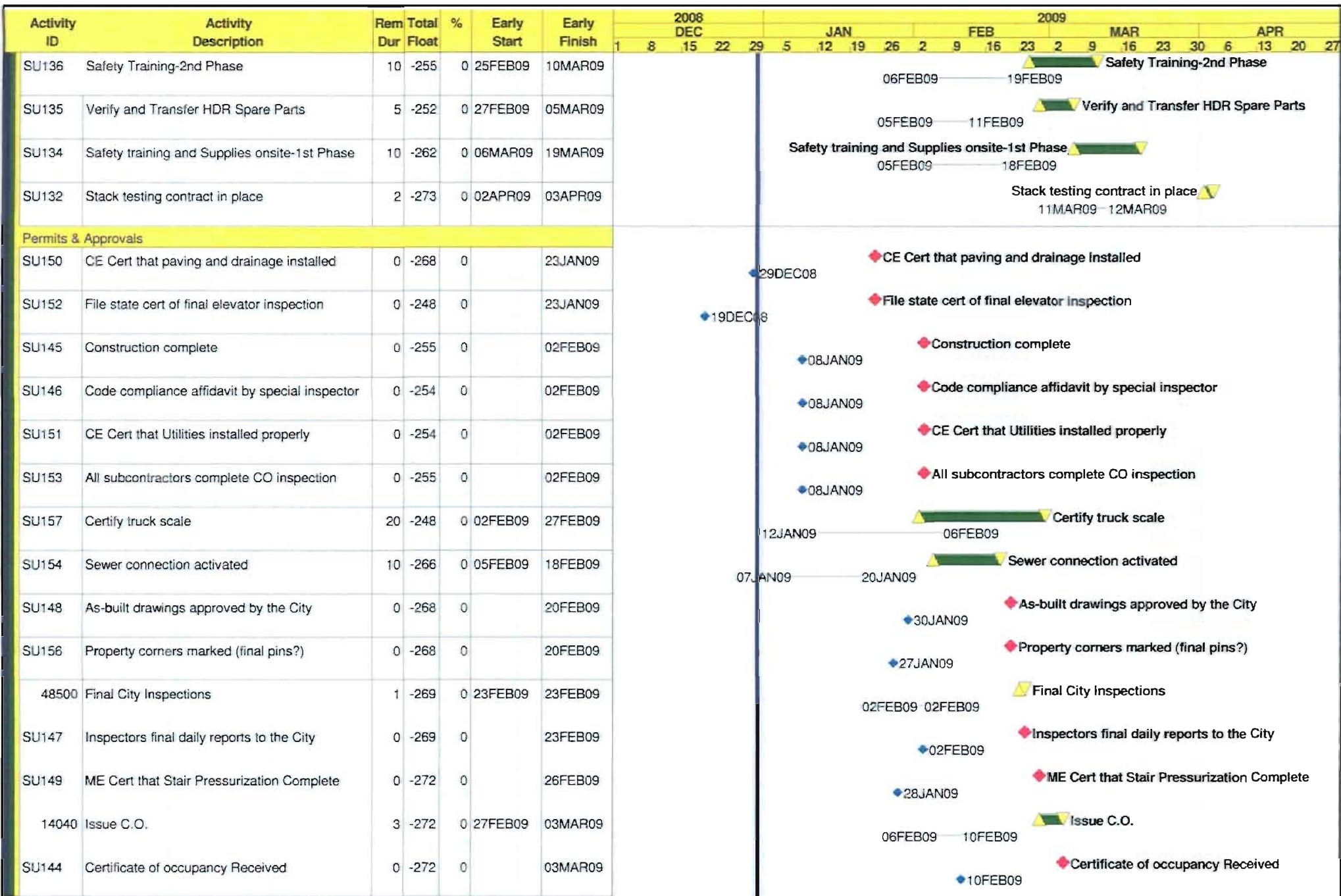
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Start Date	01JAN05		Early Bar
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Activity ID	Activity Description	Rem Dur	Total Float	%	Early Start	Early Finish	2008					2009																					
							DEC	JAN				FEB			MAR			APR															
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6	13	20	27					
NEFCO Testing																																	
SU190	Start Functional Testing	0	-223	0	26JAN09*																												
SU191	Functional Testing	19*	-276	0	26JAN09	19FEB09																											
SU189	Functional Testing Complete	0	-276	0		19FEB09																											
SU170	Sequence / Interlock Testing for both trains	11*	-275	0	20FEB09	06MAR09																											
SU188	Verify Support Equipment Ready - both trains	1	-276	0	20FEB09	20FEB09																											
48300	Final C/O Dry Run (Sequencing)	11*	-401	0	21FEB09	03MAR09																											
SU177	Air System - both trains	3	-401	0	21FEB09	23FEB09																											
SU178	Dryer System - both trains	3	-401	0	24FEB09	26FEB09																											
SU179	Feed System - both trains	3	-401	0	27FEB09	01MAR09																											
SU180	Truck Unloading - both trains	1	-401	0	02MAR09	02MAR09																											
SU181	Truck Loadout (Pellet) - both trains	1	-401	0	03MAR09	03MAR09																											
SU182	Dry Recycle Testing - both trains	3	-401	0	04MAR09	06MAR09																											
SU183	Recieve 1st Load of wet cake - both trains	1	-401	0	07MAR09	07MAR09																											
48400	Process Start-Up Wet Product	5*	-401	0	08MAR09	12MAR09																											
SU185	Train 1 Wet Testing	2	-401	0	08MAR09	09MAR09																											
SU186	Train 2 Wet Testing	2	-401	0	10MAR09	11MAR09																											
SU187	Pellet Loadout System - both trains	1	-401	0	12MAR09	12MAR09																											
Acceptance Test																																	
48600	Acceptance Testing	27*	-401	0	13MAR09	08APR09																											

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							DEC					JAN				FEB			MAR			APR						
							1	8	15	22	29	5	12	19	26	2	9	16	23	2	9	16	23	30	6	13	20	27
48620	Stack Testing	20	-399	0	13MAR09	01APR09													Stack Testing									
SU164	Train 1 Acc. Testing	5	-401	0	13MAR09	17MAR09													Train 1 Acc. Testing									
SU165	Train 2 Acc. Testing	5	-401	0	18MAR09	22MAR09													Train 2 Acc. Testing									
SU167	Acceptance Test Report submitted to SWA	10	-401	0	23MAR09	01APR09													Acceptance Test Report submitted to SWA									
SU166	Stack Test Report submitted to SWA	5	-399	0	02APR09	06APR09													Stack Test Report submitted to SWA									
SU168	Test Report Approval	7	-401	0	02APR09	08APR09													Test Report Approval									
48700	Final Acceptance	0	-401	0		08APR09													Final Acceptance									

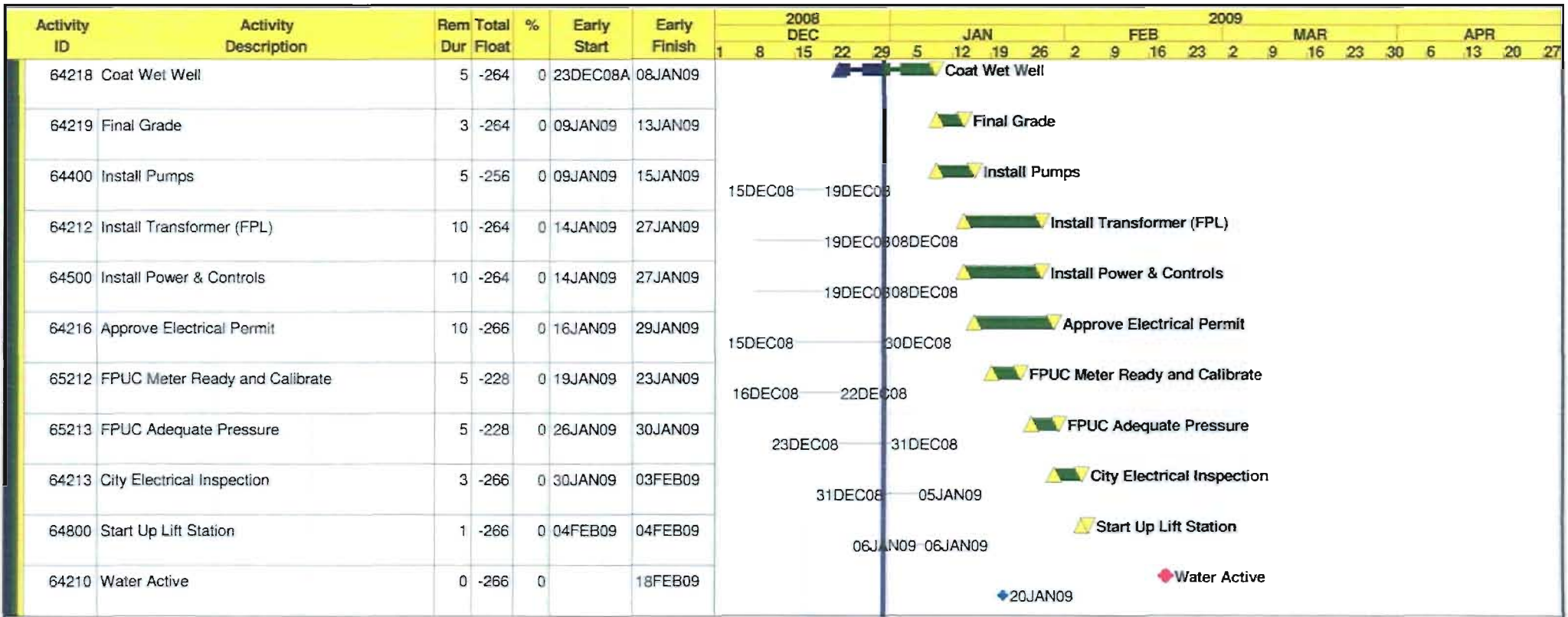
Final Compliance																							
SU175	CADD files of record drawings	0	-250	0		03MAR09													CADD files of record drawings				
SU171	Walkthrough	0	-267	0	04MAR09														Walkthrough				
SU172	Complete punch list	10	-267	0	04MAR09	17MAR09													Complete punch list				
SU173	Written certification of completion to SWA	2	-267	0	18MAR09	19MAR09													Written certification of completion to SWA				
SU174	Final inspection	5	-267	0	20MAR09	26MAR09													Final inspection				

OFFSITE UTILITIES																		
PROCUREMENT																		
63700	Fab/Del Pumps & Controls	0		100	02SEP08A	19DEC08A	Fab/Del Pumps & Controls											
CONSTRUCTION																		
64211	FPUC Installation	10	-228	85	03OCT08A	15JAN09	FPUC Installation											
64215	ReSubmit Electrical Permit	10	-266	0	17NOV08A	15JAN09	ReSubmit Electrical Permit											
64217	Prepare W / WW Conveyance Forms	15	-247	0	21NOV08A	22JAN09	Prepare W / WW Conveyance Forms											

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