



August 15, 2013

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DIVISION OF AIR
RESOURCE MANAGEMENT

Mr. Syed Arif, P.E.
Environmental Administrator, Permitting Section
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Solid Waste Authority of Palm Beach County
Palm Beach Renewable Energy Facility No. 2
Permit No. 0990234-028-AC/PSD-FL-413B
Comments on Draft Permit

Dear Mr. Arif:

The Solid Waste Authority of Palm Beach County (the Authority) is pleased to provide comments on the draft air construction permit revision dated July 29, 2013, for the Palm Beach Renewable Energy Facility No. 2 (PBREF No. 2). Our comments are presented for the Department's consideration below:

1. Section 2.3. (page 6 of 27) – Please delete the reference to Appendix CEMS. This appendix has been removed from the draft permit.
2. Section 3.A.28.d. (page 16 of 27) - Given that the revised conditions in the draft permit indicate that Hg emission limit compliance demonstrations are to be based on stack testing, the Authority requests the last sentence in this condition be deleted entirely. If the Department is unwilling to delete this sentence, then please amend the sentence as follows: “The CEMS ~~shall only~~ may be used as the method of demonstrating compliance with ~~for~~ the annual mass emission rate.”
3. Section 3.A.28.d. (page 16 of 27) – To clarify that a CEMS Operation Plan is required solely for the Hg CEMS if the calibration system associated with the Hg CEMS is not able to conform with the data quality assurance procedures in Appendix F of 40 CFR Part 60 or Appendix B of 40 CFR Part 75, the Authority requests that the third sentence of this condition be amended as follows: “If the calibration system associated with the Hg CEMS is not able to conform to the above referenced data quality assurance procedures, then the owner or operator shall propose alternate quality assurance procedures in a CEMS Operation Plan specifically for the Hg CEMS.”

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4. Section 3.B.1. (page 19 of 27) – In recognition that the facility’s design specifications now include smaller lime silos than originally planned, please change the lime silo approximate size range from 9,000 - 11,000 cubic feet to 4,000 - 5,000 cubic feet.
5. Section 3.D.3. (page 23 of 27) – The Authority has received updated vendor data on the selected emergency generator. This data indicates that the maximum output rating for the selected generator is 3705 hp (2800 kW). Consequently, we request that this condition be amended to reflect the slightly higher maximum output ratings for the emergency generator. Please recognize that the emission limits shown in Condition 3.D.7 of the permit are not affected by this change.

We appreciate the Department’s consideration of the Authority’s proposed permit revisions. If you have any questions concerning the above draft permit comments, please contact Mr. Joel Cohn with ARCADIS at (757) 873-4411 or via e-mail at Joel.Cohn@arcadis-us.com.

Very truly yours,



Mark Hammond
Executive Director
Solid Waste Authority of Palm Beach County

cc: M. Bruner
R. Schauer
P. Carroll
M. Morrison
L. Richter, Malcolm Pirnie/ARCADIS
J. Cohn, Malcolm Pirnie/ARCADIS
A. Chattopadhyay, Malcolm Pirnie/ARCADIS