



August 20, 2013

Mr. Syed Arif, P.E.
Environmental Administrator, Permitting Section
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

VIA ELECTRONIC MAIL

Subject: Comments on Draft Air Construction Permit No. 0990234-029-AC
Replacement of Existing Emergency Generator at
North County Resource Recovery (NCRRF) Scalehouse
Solid Waste Authority of Palm Beach County

Dear Mr. Arif:

The Solid Waste Authority of Palm Beach County (the Authority) is pleased to provide comments on the Draft Air Construction Permit No. 0990234-029-AC for replacement of an existing emergency generator located at the NCRRF Scalehouse. The public notice of intent to issue air permit was published on August 8, 2013. We greatly appreciate the Department's efforts in preparing this draft permit, and the opportunity to provide the comments below:

1). Section 3, Condition 3 (page 7 of 7) - Please clarify nomenclature between emergency generator and stationary diesel engine. The engine rating is 88.5 bhp which is equivalent to 66kW while the emergency generator has a design rating of 60kW, rated at 80.5 bhp. Please amend the sentence as follows: "The permittee is authorized to install, operate and maintain one 60 kW emergency generator with a maximum stationary diesel engine design rating of 60 kW 66 kW (rated at 88.5 bhp) or smaller.

2). Section 3, Condition 4 (page 7 of 7) - According to 40 CFR 60.4211(f) the emergency generator may be operated for up to 50 hours per year in non-emergency situations. Please amend the sentence as follows: "The emergency generator may operate up to 100 hours per year for maintenance and testing purposes, which includes up to 50 hours per year in non-emergency situations."

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3). Section 3, Condition 6 (page 7 of 7) - Please clarify nomenclature between emergency generator and stationary diesel engine. Please amend the sentence as follows: "The ~~emergency generator~~ stationary diesel engine shall comply with the following emission standards & limits and demonstrate compliance in accordance with the procedures given in NSPS 40 CFR 60, Subpart IIII.

4). Section 3, Condition 6 (page 7 of 7) - Please clarify nomenclature between emergency generator and stationary diesel engine. Please add stationary diesel engine to Table heading. Also, the equivalent lb/hr values listed in the Table for CO, PM, & NMHC+NOx are incorrect (see attachment). The values listed appear to be the calculated values and not the rule values. Please correct the lb/hr equivalent to the rule limits.

If you have any questions or need additional information please contact Mary Beth Morrison at mmorrison@swa.org or at 561-640-4000 ext.4613.

Sincerely,



Mark Hammond
Executive Director

Enclosure

cc: Marc Bruner, SWA
Mark McLean, SWA
Mary Beth Morrison, SWA
Sal Mohammad, Golder
Cynthia Hibbard, CDM Smith

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS
A. Emergency Generator - NCRRF Scalehouse (E.U. ID No. 037)

This section of the permit addresses the following emissions unit.

E.U. ID No.	E.U. Brief Descriptions
037	Emergency Generator - NCRRF Scalehouse Caterpillar® Model D60-8S Emergency Diesel Generator, 88.5 bhp (EPA Tier 3 certified)

NSPS AND NESHAP APPLICABILITY

- NSPS Subpart IIII Applicability: This emergency generator is a Stationary Compression Ignition Internal Combustion Engine (Stationary ICE) and shall comply with applicable provisions of 40 CFR 60, Subpart IIII, including emission testing or certification. [40 CFR 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.]
- NESHAPS Subpart ZZZZ Applicability: The emergency generator is a Liquid Fueled Reciprocating Internal Combustion Engine (RICE) and shall comply with applicable provisions of 40 CFR 63, Subpart ZZZZ. Pursuant to 40 CFR 63.6590(c) the generators must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. [40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).]

EQUIPMENT

- Emergency Generator: The permittee is authorized to install, operate and maintain one emergency generator with a maximum design rating of 60 kW power output (rated at 88.5 bhp) or smaller. [Application No. 0990234-029-AC; and Rule 62-210.200 (Definitions - Potential to Emit (PTE)), F.A.C.]

PERFORMANCE RESTRICTIONS

- Hours of Operation: The emergency generator may operate up to 100 hours per year for maintenance and testing purposes. [Application No. 0990234-029-AC; and, Rule 62-210.200 (PTE), F.A.C.] *which includes upto 50 hours per year operation in non-emergency situations.*
- Authorized Fuel: The emergency generator shall fire ultra-low-sulfur diesel fuel (ULSD) fuel oil. The ULSD fuel oil shall contain no more than 0.0015% sulfur by weight. [Application No. 0990234-029-AC; and, Rule 62-210.200 (PTE), F.A.C.]

EMISSION STANDARDS & LIMITS

- Emissions Standards & Limits: The emergency generator shall comply with the following emission standards & limits and demonstrate compliance in accordance with the procedures given in NSPS 40 CFR 60, Subpart IIII. Manufacturer certification can be provided to the Department in lieu of actual stack testing.

Emergency Generator/ engine (< 30 liters/cylinder)	CO		PM		SO ₂ ³	NMHC ⁴ + NOx (g/kW-hr)	lb/hr ²
	(g/kW-hr) ¹	lb/hr ²	(g/kW-hr)	lb/hr ²	(% S)		
Subpart IIII (2007 and later)	5.0	0.17	0.40	0.03	0.0015	0.0006	0.22 + 0.63
		0.73		0.06			0.68

¹ g/kW-hr means grams per kilowatt-hour.
² Equivalent lb/hr.
³ SO₂ emission standard will be met by using ULSD fuel oil in the emergency generator with fuel sulfur (S) content of 0.0015% by weight.
⁴ NMHC means non-methane hydrocarbons.

[Application No. 0990234-029-AC; 40 CFR 60, Subpart IIII; and, Rule 62-210.200 (PTE), F.A.C.]

RECORDS AND REPORTS

- Notification, Recordkeeping and Reporting Requirements: The permittee shall adhere to the compliance testing and certification requirements listed in 40 CFR 60.4211 and maintain records demonstrating fuel usage and quality. [40 CFR 60.4211.]