



Westinghouse
Electric Corporation

Resource Energy Systems
Division

2400 Ardmore Boulevard
Pittsburgh Pennsylvania 15221
(412) 636 5800
WIN 261 5800

EN3250NH-EN95

RECEIVED

December 20, 1989

DEC 21 1989

Mr. Bill Thomas
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

DER-BAQM

Subject: Permit Modification for Bay Resource Management Center
Nos. AC 03-145061, -152196, and PSD-FL-129

Dear Mr. Thomas:

We would like to take this opportunity to make the following comments regarding the Technical Evaluation and Preliminary Determination and proposed modified air permit for the Bay Resource Management Center located in Panama City, Florida.

1. In Specific Condition 4, the emission factors for wood and MSW for hydrogen chloride and sulfuric acid mist should have the units lb/ton listed in the table heading.
2. Specific Condition 6.f states that CO emissions, corrected to 7% O₂, shall be recorded. Based on the Florida DER's letter dated 12/16/89, Westinghouse will use the existing oxygen (wet) monitors for the correction of CO emissions. An assumed moisture correction factor will be used to correct the wet oxygen data to a dry basis.

We would like to add statements such as the following to Specific Condition 6.f. "CO emissions, corrected to 7% O₂, shall be recorded. The wet oxygen monitors may be used for the correction of CO emissions. To correct the wet oxygen data to a dry basis, a moisture correction factor can be used. The moisture content of the flue gas stream shall be determined by U.S. EPA Method 4 or another method approved by the DER. The moisture correction factor must be re-established every year. A CO value of 400 ppmv...."



AIRBILL

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PACKAGE TRACKING NUMBER: **10857581**

Date: **12/20/89**

RECIPIENT'S COPY

From (Your Name) Please Print: **Lancy Hirko**
Your Phone Number (Very Important): **(412) 636-5850**

To (Recipient's Name) Please Print: **Mr. Bill Thomas**
Recipient's Phone Number (Very Important):

Company: **SHINGHOUSE/RESOURCE ENERGY**
Department/Floor No.:

Company: **Bureau of Air Reg. Fla. Dept. of E**
Department/Floor No.:

Street Address: **100 ARDMORE BLVD COST BLVD**

Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.): **2800 Blair Stone Road (Twin Towers)**

City: **PITTSBURGH PA**
State: **PA**
ZIP Required: **15221**

City: **Tallahassee**
State: **FLA**
ZIP Required: **32309-240**

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE): **BRN500**

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SERVICES		DELIVERY AND SPECIAL HANDLING		PACKAGES	IN PAPER	DECLARED VALUE	OVER SIZE	Emp. No.	Date	Federal Express Use
1 <input checked="" type="checkbox"/> PRIORITY Overnight Delivery	6 <input checked="" type="checkbox"/> OVERNIGHT LETTER	1 <input type="checkbox"/> HOLD FOR PICK-UP (Fit in Box)								Base Charges
2 <input type="checkbox"/> COURIER-PAK OVERNIGHT ENVELOPE	7 <input type="checkbox"/>	2 <input checked="" type="checkbox"/> DELIVER WEEKDAY								Declared Value Charge
3 <input type="checkbox"/> OVERNIGHT BOX	8 <input type="checkbox"/>	3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge)								Other 1
4 <input type="checkbox"/> OVERNIGHT TUBE	9 <input type="checkbox"/>	4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge)								Other 2
5 <input type="checkbox"/> STANDARD AIR Delivery (not later than second business day)	10 <input type="checkbox"/>	5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS) (Extra charge) (Passes Signature Not Applicable)								Total Charges
		6 <input type="checkbox"/> DRY ICE								
		7 <input type="checkbox"/> OTHER SPECIAL SERVICE								
		8 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge)								
		9 <input type="checkbox"/>								
		10 <input type="checkbox"/>								
		11 <input type="checkbox"/>								
		12 <input type="checkbox"/> HOLIDAY DELIVERY (Extra charge)								

PART #111800
REVISION DATE 10/88
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4/89

3. Specific Condition 2.a states that the maximum charging rate of each combustor shall not exceed 255 tons of municipal solid waste per day (TPD) or 510 TPD for the facility. In addition, a heat input of 95.6 million Btu per hour (assuming a heating value of 4500 Btu/lb) and a steam production rate of 68,000 lbs/hr must be maintained.

Westinghouse would like to request that the tonnage of municipal solid waste incinerated at the facility be averaged over a monthly period instead of on a daily basis. The 510 TPD limit restricts the operator's ability to optimize facility performance due in part to the variation in the higher heating value (HHV) of the waste. The HHV of the waste burned in the combustors varies because of the heterogeneous nature of the waste. (See Attachment 13, Item 8, from PSD-FL-129 permit dated October 13, 1988.)

Westinghouse proposes that scalehouse records be used to monitor the tonnage of municipal solid waste that is incinerated in the Bay Facility. Westinghouse believes that the load cells located on the inclined conveyors are not as accurate as the weights recorded at the scalehouse. The amounts of MSW, non-burnable MSW, trash, and wood are currently monitored at the scalehouse. Bay personnel also track the weights of these materials and average them over daily, monthly, and yearly periods.

Attached are daily averages from July, August, and September 1989, Tables 1-3, and the monthly/yearly average for the period from October 1988 thru September 1989, Table 4. Although there are several instances when the daily total MSW charged was slightly over the 510 TPD limit, the overall monthly average was well within the 510 TPD limit, Tables 1-3. The monthly and yearly averages, Table 4, indicate that the average daily tons burned was 434 TPD which is also within the 510 TPD guideline. The variations in charging weights can be attributed to fluctuations in MSW HHV as well as facility availability.

A monthly averaging period was selected because it represents a reasonable averaging time that is currently being used at the Bay Facility. This would be similar to averaging periods used to record mass-burn throughput at other waste-to-energy (WTE) facilities. For example, the permit issued by the New York DEC for the Dutchess County WTE plant states that the maximum throughput (in TPD) is averaged over a 30-day period. Therefore, we request that the Florida DER consider a similar averaging period as the permit limit.

If you have any questions regarding the above items, please call me at (412) 636-5806, or Nancy Hirko at (412) 636-5890.

Sincerely,



David S. Beachler, Manager
Environmental & Quality Engineering

cc: N.M. Hirko, Westinghouse RESD
M. R. Lindsey, Bay Resource Management Center
P. Raval
B. Andrews
J. Rogers
CHF/BT

Pradeep -

See about 7-day as we did for Hillsboro.
I think SPA will accept that, but question 30
days. See what they think of 7 days and explain
to them why we believe that is better

12/22

12-21

~~CFR~~ FYI

PA

Should we treat
them like McKay
Bay on MSW
averaging? PR

TABLE 2

AVERAGE DAILY MATERIAL WEIGHTS - AUGUST 1989
 BAY RESOURCE MANAGEMENT CENTER

306.00 01-Aug 1	307.00 02-Aug 2	308.00 03-Aug 3	309.00 04-Aug 4	310.00 05-Aug 5	311.00 06-Aug 6	312.00 07-Aug 7	313.00 08-Aug 8	314.00 09-Aug 9	315.00 10-Aug 10	316.00 11-Aug 11	317.00 12-Aug 12	318.00 13-Aug 13	319.00 14-Aug 14	320.00 15-Aug 15	321.00 16-Aug 16	322.00 17-Aug 17
151.00	159.79	176.60	174.99	157.50	153.70	139.70	159.16	153.19	148.90	209.50	160.60	134.69	0.00	243.20	252.00	65.70
264.40	289.00	273.20	275.50	240.20	326.90	138.80	37.00	281.90	281.90	282.30	283.90	215.69	262.71	305.75	252.15	312.50
435.40	448.76	409.80	450.40	398.16	480.60	278.50	195.10	435.60	430.80	491.80	444.50	350.69	262.71	548.95	514.15	378.20
475.71	293.59	340.54	415.84	254.36	92.87	453.56	503.66	345.96	767.69	465.78	216.78	60.07	500.63	524.89	342.85	290.59
122.77	156.42	176.46	139.71	44.47	6.64	177.03	129.66	133.83	219.20	159.97	57.74	13.95	168.04	136.39	176.19	204.03
11.48	0.00	0.00	0.00	8.74	0.00	74.06	15.90	21.64	0.00	24.26	0.00	0.00	16.92	23.31	0.00	0.00
588.00	450.01	517.00	555.55	292.05	101.51	596.53	616.64	458.15	586.89	601.49	274.52	93.98	651.75	637.96	519.04	494.62
0.00	0.00	46.71	56.14	0.00	12.59	62.32	150.93	97.06	35.37	143.69	0.00	0.00	79.29	154.46	118.21	203.76
588.00	450.01	563.71	643.69	292.05	114.10	658.85	767.57	555.21	622.26	745.18	274.52	93.98	731.04	792.42	637.25	698.38
323.20	324.00	325.00	326.00	327.00	328.00	329.00	330.00	331.00	332.00	333.00	334.00	335.00	336.00			
18-Aug 18	19-Aug 19	20-Aug 20	21-Aug 21	22-Aug 22	23-Aug 23	24-Aug 24	25-Aug 25	26-Aug 26	27-Aug 27	28-Aug 28	29-Aug 29	30-Aug 30	31-Aug 31	TOTAL	AVERAGE	
135.30	154.30	156.50	160.60	139.20	156.30	171.90	120.40	155.10	147.70	139.70	147.50	157.80	163.30	4716.00	152.13	
230.90	240.50	277.00	303.65	311.95	310.45	276.40	281.50	262.20	208.50	258.50	291.63	0.00	354.75	7951.53	256.50	
366.20	394.80	433.50	464.45	451.15	466.95	448.30	401.90	417.30	356.20	398.20	439.33	157.50	518.05	12667.55	408.63	
444.47	236.23	69.89	455.94	459.78	296.98	287.47	392.28	194.12	76.13	448.80	367.43	263.27	282.34	10261.17	331.01	
123.34	65.40	9.34	175.82	141.25	143.90	199.74	106.84	42.74	7.89	162.78	122.32	175.64	169.53	3875.19	125.01	
26.43	0.00	0.00	30.28	11.37	23.00	0.00	6.97	0.00	17.97	32.96	6.07	0.00	0.00	300.51	9.69	
539.33	304.63	79.23	601.48	589.66	416.98	487.21	495.05	236.86	66.05	588.62	503.68	439.51	451.87	13835.85	446.32	
23.62	126.03	0.00	74.21	50.13	142.52	189.25	206.48	21.59	0.00	177.98	157.40	135.00	93.58	2592.32	83.62	
562.95	430.66	79.23	675.69	639.79	559.50	676.46	783.53	258.45	66.05	766.60	661.08	574.51	545.45	16428.17	529.94	

TABLE 4

AVERAGE MONTHLY MATERIAL WEIGHTS - 10/88 - 9/89
 BAY RESOURCE MANAGEMENT CENTER

GENERAL (1989) OPERATIONAL DATA	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEPT	YTD TOTAL	MONTHLY AVERAGE	DAILY AVERAGE	MONTHLY PERCENTAGE
WOOD RECEIVED TONS	2,817.41	7,248.84	5,572.25	5,822.04	2,808.43	4,176.58	815.26	3,488.27	1,043.27	1,262.92	2,592.32	3,528.95	41,207.62	4,578.18	150.38	
PSW RECEIVED TONS	7,294.14	7,231.39	6,741.42	8,046.25	7,075.20	9,542.06	8,949.48	10,375.53	11,082.53	11,093.95	10,261.17	8,572.89	106,407.11	11,827.01	386.35	
TRASH RECEIVED TONS	1,192.87	3,188.14	2,345.45	1,182.51	2,785.85	4,055.71	3,748.43	3,913.92	4,160.91	2,940.41	3,875.19	1,155.54	41,599.95	4,666.66	152.28	
WHITE BOSSOS TONS	255.14	229.87	156.33	228.44	258.48	224.17	325.69	258.57	227.93	216.37	300.51	222.95	2,965.15	329.86	10.53	
WHITE BOSSOS	2,761	2,121	2,364	2,073	2,571	1,642	2,561	2,674	1,592	1,492	2,172	1,918	9,091	2,391	2,001	2,001
TOTAL FUEL RECEIVED	13,152.18	17,467.52	14,816.49	16,822.76	15,811.10	17,560.18	13,227.57	17,482.85	15,058.78	15,975.91	16,428.17	15,021.41	186,642.52	20,738.06	681.18	
TONS BURNED - UNIT#1	5,919.20	9,382.80	4,423.00	5,661.90	4,042.50	2,916.70	6,145.50	5,027.60	5,604.20	4,520.80	4,716.30	5,245.40	63,048.70	7,005.41	220.16	
TONS BURNED - UNIT#2	3,754.50	5,193.50	5,597.40	5,527.20	7,293.70	4,951.20	5,992.20	6,609	3,253.42	2,259.91	3,951.53	4,374.38	55,919.25	6,213.31	204.06	
TOTAL BURNED	9,673.70	14,576.30	9,930.40	11,429.60	8,249.40	6,977.90	12,137.70	5,027.60	6,757.62	11,529.81	12,567.83	10,719.78	118,968.45	13,218.72	424.19	
TOTAL ASH TONS	4,625.66	4,247.14	4,623.97	4,928.23	4,295.50	5,577.52	5,776.70	5,394.72	5,563.16	5,424.22	5,145.25	4,756.84	60,319.32	6,792.15	220.14	
ASH/TON (TRUCK SCALE)	0.37	0.24	0.31	0.29	0.24	0.32	0.45	0.31	0.32	0.34	0.31		0.32			
ASH/TON (INCLINE SCALE)	0.50	0.29	0.47	0.43	0.49	0.90	0.45	1.07	0.25	0.46	0.41	0.41	0.51			
GROSS GENERATION MWH	7,595.54	7,700.82	7,886.10	8,740.44	6,290.74	8,041.85	7,641.18	8,084.12	6,559.34	6,956.75	7,442.77	7,173.35	89,828.90	9,980.99	327.84	13.66
GROSS KW/TON (TRUCK SCALE)	577.51	449.87	522.47	475.81	489.23	457.74	592.77	462.45	495.10	429.11	453.35	477.56	481.29			
GROSS KW/TON (INCLINE SCALE)	785.17	528.31	734.14	723.74	1,606.65	1,152.47	646.01	1,637.95	972.18	530.06	527.94	612.69	755.06			
NET GENERATION MWH	6,264.65	6,945.32	7,114.93	7,545.44	5,592.72	7,258.02	7,063.28	7,262.62	5,805.09	6,110.25	6,527.07	6,392.15	80,603.45	8,955.94	294.17	12.26
NET KW/TON (TRUCK SCALE)	521.74	297.61	480.40	449.54	442.44	412.85	515.49	415.41	361.49	382.38	463.52	425.54	431.86			
NET KW/TON (INCLINE SCALE)	719.62	476.43	715.42	663.17	891.92	1,340.14	583.57	1,444.35	859.01	516.91	523.21	545.42	677.52			
AVAILABILITY UNIT #1	91.78%	91.64%	77.92%	93.44%	77.37%	96.37%	99.82%	91.41%	92.89%	73.39%	96.51%	98.61%	90.74%			
AVAILABILITY UNIT #2	83.27%	91.29%	76.75%	96.44%	75.27%	92.91%	90.56%	76.77%	74.31%	82.12%	89.20%	84.51%	86.59%			
TOTAL PLANT AVAILABILITY	87.37%	92.56%	77.38%	94.44%	76.58%	94.94%	94.69%	84.09%	83.65%	86.10%	92.25%	91.46%	88.45%			
CAPACITY FACTOR:																
GROSS CAPACITY FACTOR (11.5mw)	66.77%	93.91%	92.17%	97.49%	78.60%	92.79%	94.70%	94.45%	75.74%	80.24%	87.85%	86.14%	89.97%			
NET CAPACITY FACTOR (10.2mw)	95.58%	93.65%	92.85%	98.45%	78.81%	94.71%	95.51%	94.37%	76.28%	79.72%	86.51%	86.17%	89.39%			
THROUGHPUT RECEIVED (51.2 tons)	83.29%	114.17%	95.65%	106.41%	95.27%	111.20%	86.45%	110.58%	104.96%	111.67%	105.94%	98.13%	94.79%			
THROUGHPUT BURNED (51.5 tons)	61.29%	95.27%	87.81%	72.29%	42.25%	44.14%	79.33%	31.87%	44.17%	74.77%	80.12%	76.59%	63.74%			
RAINFALL											5.0		5.65			



Westinghouse
Electric Corporation

Resource Energy Systems
Division

2400 Ardmore Boulevard
Pittsburgh Pennsylvania 15221
(412) 636 5800
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December 15, 1989

DEC 18 1989

DER-BAQM

Mr. Clair H. Fancy, Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Permit Modification for Bay Resource Management Center
Nos. AC 03-145061, -152196, and PSD-FL-129

Dear Mr. Fancy:

As required by the Florida DER, a Notice of Intent to Issue was published in the News-Herald, the local newspaper in Panama City, Florida. The proof of publication is enclosed along with a clipping of the notice.

Please call me at (412) 636-5890 if there are any questions.

Sincerely,

Nancy M. Hirko
Senior Engineer
Environmental & Quality Engineering

cc: D. S. Beachler

P. Daval

AIRBILL

USE THIS AIRBILL FOR DOMESTIC SHIPMENTS WITHIN THE CONTINENTAL U.S.A. ALASKA AND HAWAII.
USE THE INTERNATIONAL AIRWAY BILL FOR SHIPMENTS TO PUERTO RICO.
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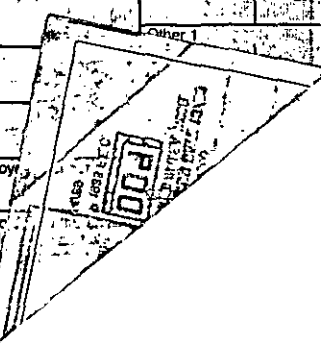
From (Your Name): Please Print: Nancy Birko
 Your Phone Number (Very Important): (412) 636-5890
 To (Recipient's Name): Please Print: Mr. Clair Faney
 Recipient's Phone Number (Very Important):
 Company: TESTINGHOUSE/RESOURCE ENERGY
 Department/Floor No.:
 Company: Bureau of Air Regulation
 Department/Floor No.:
 Street Address: 400 ARMORE BLVD COST BLDG
 City: PITTSBURGH PA
 State: PA
 ZIP: 15201
 Street Address: 2600 Blair Stone Rd.
 City: Tallahassee
 State: FL
 ZIP: 32309

YOUR BILLING REFERENCE INFORMATION (FIRST 24 CHARACTERS WILL APPEAR ON INVOICE): 8RN500

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1 <input type="checkbox"/> PRIORITY 1 Overnight Delivery	6 <input checked="" type="checkbox"/> OVERNIGHT LETTER	1 <input type="checkbox"/> HOLD FOR PICK-UP	2 <input checked="" type="checkbox"/> DELIVER WEEKDAY	3 <input type="checkbox"/> DELIVER SATURDAY	4 <input type="checkbox"/> DANGEROUS GOODS	5 <input type="checkbox"/> CONSTANT SURVEILLANCE SERVICE (CSS)	6 <input type="checkbox"/> DRY ICE	7 <input type="checkbox"/> OTHER SPECIAL SERVICE	8 <input type="checkbox"/> SATURDAY PICK-UP
2 <input type="checkbox"/> COURIER-PAK OVERNIGHT ENVELOPE	7 <input type="checkbox"/> REGISTERED MAIL	9 <input type="checkbox"/> RETURN TO SENDER	10 <input type="checkbox"/> RETURN TO ADDRESSEE	11 <input type="checkbox"/> RETURN TO OFFICE	12 <input type="checkbox"/> HOLIDAY DELIVERY	Received By: X		Sender authorizes Federal Express to indemnify and hold harmless Federal claims resulting therefrom.	
3 <input type="checkbox"/> OVERNIGHT BOX	8 <input type="checkbox"/> REGISTERED MAIL	Total Charges		Total Charges		Date/Time Received		Signature	
4 <input checked="" type="checkbox"/> OVERNIGHT TUBE	9 <input type="checkbox"/> REGISTERED MAIL	Total Charges		Total Charges		Date/Time Received		Signature	
5 <input type="checkbox"/> STANDARD AIR Delivery not later than second business day	10 <input type="checkbox"/> REGISTERED MAIL	Total Charges		Total Charges		Date/Time Received		Signature	



Florida Freedom Newspapers, Inc.

PUBLISHERS OF THE NEWS - HERALD
Panama City, Bay County, Florida
Published Daily

State of Florida
County of Bay

Before the undersigned authority appeared _____

Scott Walker, who on oath says that (s)he

is Advertising Director of the News-Herald, a daily

newspaper published at Panama City, in Bay County, Florida; that the attached copy

of advertisement, being a Legal Notice

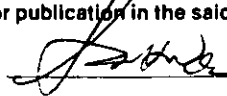
in the matter of Intent to Issue

in the Bay County

Court, was published in said newspaper in the issues of _____

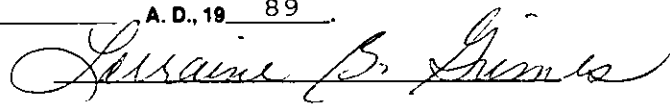
November 21, 1989

Affiant further says that the News-Herald is a direct successor of the Panama City News and that this publication, together with its direct predecessor, has been continuously published in said Bay County, Florida, each day (except that the predecessor, Panama City News, was not published on Sundays), and that this publication, together with its said predecessor, has been entered as a second class mail matter at the post office in Panama City in said Bay County, Florida, for a period of one year next preceding the first publication of the attached copy of the advertisement, all in accordance with the provisions of section 49.03, Florida Statutes; and affiant further says that (s)he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.



Sworn to and subscribed before me this 21st day of

November A. D., 19 89



Notary Public, State of Florida at Large

Notary Public, State of Florida

My Commission Expires My Commission Expires Aug. 25, 1992

Bonded thru Troy Fair - Insurance Inc.

8032. State of Florida
Department of
Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue revised permits to Bay Resource Management Center, c/o Westinghouse RESD, Cost Building, 2400 Ardmore Blvd., Pittsburgh, Pennsylvania 15221, for the Bay County Waste-to-Energy facility in Panama City, Bay County, Florida. The project involves the revision of the lead emission limits.

A revision of Best Available Control Technology (BACT) was not required. A revision of the PSD increment consumption was not required. The maximum combined pollutant concentrations from the facility and other sources in the area will be less than the National Ambient Air Quality Standards (NAAQS). The NAAQS are levels set by the EPA which identify the ambient concentration necessary to protect human health and welfare with an adequate margin of safety. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The Petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time filing. Failure to file a petition within this time period shall constitute a waiver of any right, such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number, and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or Proposed action;
- (f) A statement of which rules

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NOV 22 1993

NOV 22 1993
NOV 22 1993
NOV 22 1993

or statutes Petitioner contends require reversal or modification of the Department's action or proposed action; and

(g) A statement of the relief sought by Petitioner, stating precisely the action Petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the Position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a Party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

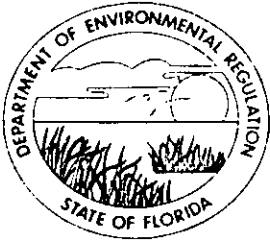
Department of
Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road,
Tallahassee,
Florida 32399-2400

Dept. of
Environmental Regulation
Northwest District Office
160 Governmental Center
Pensacola,
Florida 32501-5794

Department of
Environmental Regulation
Northwest District
Branch Office
340 West 23rd Street,
Suite E
Panama City, Florida 32405

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the Department's final determination. Furthermore, a public hearing can be requested by any person. Such requests must be submitted within 30 days of this notice.

November 21, 1989



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

December 16, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ms. Nancy M. Hirco
Westinghouse RESD
2400 Ardmore Boulevard
Pittsburgh, Pennsylvania 15221

Dear Ms. Hirco:

RE: Oxygen Monitors For Bay County Refuse-to Energy Facility,
Specific Condition 6.f., PSD-FL-129

The Department has reviewed your request dated November 29, 1989, for using the existing oxygen monitors to correct carbon monoxide emissions to 7% O₂, at the Bay County Refuse-to-Energy Facility located in Panama City, Bay County, Florida.

You may use the existing oxygen monitors for the correction of CO emissions. However, to correct the wet O₂ data to dry basis, the moisture content determined by EPA Method 4, or any other method after DER approval, shall be used. You will need to re-establish the moisture correction factor every year.

If you have any questions contact Pradeep Raval at (904) 488-1344, or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/pr

cc: E. Middleswart, NW District
W. Aronson, EPA

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Jim *JK*

Initial

Date

2.

Pradeep

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

This needs to be answered.
I think EPA concurrence would be in order considering their interest in both CEMs and in Waste-to-Energy facilities

Pradeep,

Hasn't this already been answered? Paul Keimann didn't have a problem with it.

Clay,

I will write a letter soon. I have already indicated

FROM:

to them that this is OK with a minor change. Clay JK

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

DATE

12/12

PHONE

SENDER: Complete items 1 and 2, when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Ms. Nancy M. Hirko Westinghouse RESD 2400 Ardmore Blvd. Pittsburgh, PA 15221	4. Article Number P 938 762 778 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Addressee X <i>Paul Johns</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 12-19-89	

PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT

P 938 762 778

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
Ms. Nancy M. Hirko, Westing-	
Street and No. house RESD	
2400 Ardmore Blvd.	
P.O., State and ZIP Code	
Pittsburgh, PA 15221	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
Mailed: 12-15-89	
Permit: PSD-FL-129	

PS Form 3800, June 1985

DIVISION OF AIR RESOURCE MANAGEMENT

(For Internal Use Only)

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

CLAIR FAUCY

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

PRADDEP HAS COORDINATED THIS WITH PAUL REINERMAN AND RICK PRUSA.

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

Jim P.

DATE

12/14/89

PHONE

44



Westinghouse
Electric Corporation

Resource Energy Systems
Division

2400 Ardmore Boulevard
Pittsburgh Pennsylvania 15221
(412) 636 5800
WIN 261 5800

EN3156NH

November 29, 1989

RECEIVED

DEC 04 1989

DER - BAQM

Mr. Clair Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Fancy:

I am writing to clarify two issues concerning the air quality permits at the Bay Resource Management Center located in Panama City, Florida. The permit numbers are AC 03-145061, AC 03-152196, and PSD-FL-129.

In the Specific Conditions section of the permit, item 6.f states that "CO emissions, corrected to 7% O₂, shall be recorded." Westinghouse plans to use the oxygen monitors currently installed in each combustor/boiler train to correct the carbon monoxide emissions to 7% oxygen. The oxygen monitors currently installed record data on a wet basis. Westinghouse proposes to use a moisture correction factor to correct the wet oxygen data to a dry basis, thus facilitating the correction of the CO emission data to 7% O₂ on a dry basis. This methodology was verbally agreed to by Pradeep Raval in September 1988. In recent discussions with Pradeep and Jim Pennington, it was requested that Westinghouse verify the proposed correction method with actual data.

I have enclosed for your review data from a test program conducted at the Bay Resource Management Center in March 1988. This data was selected because percent oxygen was monitored at the same location by both the plant (wet oxygen monitor) and by the stack test team (dry oxygen monitor).

Table A shows the actual wet oxygen levels measured by the in-situ oxygen monitor (Column A) and the actual dry oxygen levels as measured by the stack test team (Column C). Using an assumed flue gas moisture content of 22%, the plant oxygen levels were corrected to a dry basis (Column B). The oxygen values are compared and the percent difference is shown in Column (D). The average moisture content over the four days is approximately 17% (Column E) and ranged from 12.9% to 24.6%.

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SERIALIZED
INDEXED

CO ambient conc
in Bay County in last
five years.

Ask for Nancy Hirko

412 636 5890.

Page 2
November 29, 1989

The CO emission levels as measured by the test team (Column F) were then corrected to 7% O₂ on a dry basis using both the calculated plant oxygen (dry) data (Column G) and the test team's dry oxygen data (Column H).

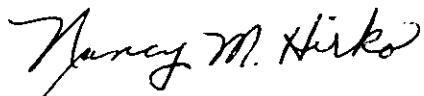
In summary, all data indicate a good comparison when correcting CO emission data with either a wet, in-situ oxygen monitor or a dry, extractive oxygen monitor. Westinghouse proposes to use the wet, in-situ oxygen monitors currently installed and an assumed moisture correction value of 22% to correct CO emission data to 7% O₂ on a dry basis. The 22% moisture value is representative of the operating conditions at the Bay Resource Management Center. Although this value is slightly higher than the average moisture content measured during the test period, it insures that the correction errs on the high side. In otherwords, by using the calculated dry %O₂, the CO emissions data reported will, in most cases, be slightly greater than the actual CO emissions present in the flue gas stream.

If possible, we need to know if this method for correcting the CO emission data to 7% O₂ is satisfactory by December 7, 1989. Depending on your decision, equipment may have to be ordered and it would be prudent to order it as soon as possible. Please inform me if the deadline cannot be met.

With regard to data reporting requirements, CO emissions exceeding the permitted limit of 800 ppm corrected to 7% O₂ will be reported on a quarterly basis as required by Specific Condition 8.c.

Unless otherwise notified, Westinghouse will correct CO emission data and report excess emissions as stated above. If there are any questions, please contact David Beachler at 412-636-5806 or me at 412-636-5890.

Sincerely,



Nancy M. Hirko
Senior Engineer
Environmental & Quality Engineering

cc: D. Beachler
D. Johnson, Bay County
M. Lindsey, Bay County
D. McKeand, Bay County
J. Pennington
P. Raval

TABLE A
BAY DATA - UNIT 2

COLUMN	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
DATE	TIME	PLANT MONITOR MET %O ₂	CALCULATED DRY %O ₂ *	TEST TEAM MEASURED DRY %O ₂	% DIFFERENCE (calculated vs. measured)	MEASURED MOISTURE, %	ACTUAL MEASURED CO, ppm DRY	CO corrected to 7% O ₂ BASED ON CALCULATED O ₂	BASED ON MEASURED O ₂
3-9-88	12:01 - 13:00	5.4	6.9	6.9	0.3	21.8	105.0	104.4	104.3
	13:01 - 14:00	4.8	6.2	6.2	-0.8	22.2	132.0	124.4	124.8
	14:01 - 15:00	4.95	6.3	6.33	0.3	22.9	70.8	67.6	67.5
	15:01 - 16:00	5.45	7.0	7.03	-0.6	22.3	95.6	95.5	95.8
	16:04 - 17:00	5.72	7.3	7.4	-0.9	22.6	115.7	118.5	119.1
	17:01 - 18:00	6.18	7.9	7.88	3.1	20.3	127.0	136.0	133.5
	18:01 - 19:00	6.35	8.1	7.97	2.1	20.2	145.5	158.5	156.4
	19:01 - 20:00	5.58	7.2	7.15	0.1	21.6	125.0	126.4	126.4
	3-10-88	9:01 - 10:00	6.04	7.7	7.48	3.4	19	89.3	94.3
10:01 - 11:00		5.32	6.8	6.51	4.6	18.2	77.3	76.3	74.7
11:01 - 12:00		5.52	7.1	6.74	4.8	17.9	108.0	108.6	106.0
12:01 - 13:00		5.41	6.9	6.69	3.5	18.8	89.4	89.0	87.4
13:01 - 14:00		6.21	8.0	7.42	6.8	16.4	365.5	392.7	376.9
14:01 - 15:00		8.91	11.4	10.41	8.9	13.6	666.4	977.4	883.0
15:19 - 16:00		6.9	8.8	8.1	8.4	14.4	320.9	370.0	348.5
16:01 - 17:00		6.5	8.3	7.6	8.8	14.3	197.3	218.2	206.2
17:01 - 18:00		6.1	7.8	7.1	9.2	14.5	188.0	199.8	189.4
19:04 - 20:00		5.09	6.5	6.62	-1.4	22.8	105.6	102.1	102.8
20:01 - 21:00		5.01	6.4	6.53	-1.7	23.1	105.8	101.6	102.3
21:01 - 22:00		5.54	7.1	7.13	-0.4	21.9	126.0	126.9	127.2
3-11-88		6:09 - 7:00	5.43	7.0	6.93	0.5	20.8	105.7	105.4
	7:01 - 8:00	5.96	7.6	7.38	3.4	19	91.2	95.6	93.8
	8:01 - 9:00	6.22	8.0	7.61	4.6	18	114.0	122.6	119.2
	9:01 - 10:00	7.24	9.3	9.01	2.9	19.4	274.8	328.8	321.3
	10:01 - 11:00	5.87	7.5	7.37	2.1	19.5	166.1	172.6	170.6
	11:01 - 12:00	6.67	8.6	9.03	-5.6	16.5	223.1	251.1	261.3
	12:04 - 13:00	6.56	8.4	8.72	-3.7	24.6	218.5	243.2	249.4
	13:01 - 14:00	8.32	10.7	9.94	6.8	16	292.4	397.2	370.8
	14:01 - 15:00	7.56	9.7	9.37	3.3	19.2	230.2	285.5	277.5
	15:19 - 16:00	5.94	7.6	7.37	3.2	19.1	162.7	170.2	167.1
	16:19 - 17:00	5.76	7.4	7.14	3.3	19.2	110.1	113.2	111.2
	17:01 - 18:00	4.95	6.3	6.16	2.9	19.4	117.3	112.0	110.6
	19:01 - 20:00	5.16	6.6	6.36	3.9	18.5	99.5	96.8	95.1
	20:01 - 21:00	5.43	7.0	6.85	4.5	18	102.2	101.9	99.7
	21:06 - 22:00	5.33	6.8	6.6	3.4	18.9	133.1	131.5	129.4

TABLE A (continued)
BAY DATA - UNIT 2

COLUMN	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
DATE	TIME	PLANT MONITOR WET %O ₂	CALCULATED DRY %O ₂ *	TEST TEAM MEASURED DRY %O ₂	% DIFFERENCE (calculated VS. measured)	MEASURED MOISTURE, %	ACTUAL	CO corrected to 7% O ₂	
							MEASURED CO, ppm DRY	BASED ON CALCULATED O ₂	BASED ON MEASURED O ₂
3-12-88	6:06 - 7:00	6.37	8.2	7.25	11.2	12.9	114.4	124.9	116.5
	7:01 - 8:00	6.03	7.7	7.07	8.5	14.5	115.1	121.5	115.7
	8:01 - 9:00	6.68	8.6	7.83	8.6	14.5	171.3	193.0	182.2
	9:09 - 10:00	6.77	8.7	7.89	9.1	14	171.6	195.2	183.3
	10:01 - 11:00	7.12	9.1	8.33	8.7	14.3	195.6	231.0	216.3
	12:01 - 13:00	7.61	9.8	8.84	9.4	13.4	218.0	271.9	251.3
	13:01 - 13:46	7.52	9.6	8.99	6.8	16.3	214.7	265.1	250.6
	15:01 - 16:00	7.5	9.6	8.92	7.2	15.8	413.9	509.8	480.2
	16:01 - 17:00	7.22	9.3	8.82	4.7	18	304.9	364.0	350.8
	17:01 - 18:00	7.2	9.2	8.65	6.3	16.7	321.4	382.8	364.7
	18:01 - 19:00	7.59	9.7	8.95	8.0	15.1	379.5	472.2	441.4
	19:01 - 20:00	7.49	9.6	8.81	8.3	14.9	310.3	381.8	356.8
	AVERAGE VALUES:		5.77	7.40	6.68	3.67	16.77	164.7	189.2

NOTE: * ASSUMED %H₂O = 22.0

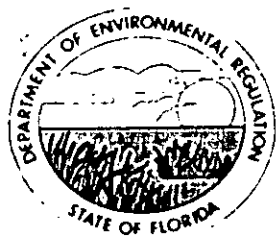
(A), (C), (E), and (F) represent actual test data.

(B) = (A)/(1.00-0.22)

(D) = % Difference between (B) and (C)

(G) = (F)*(13.9/20.9-(B))

(H) = (F)*(13.9/20.9-(C))



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

November 27, 1989

Mr. Andrew Saul
P. O. Box 196
Moyler - Rose Valley, PA 19065

Dear Mr. Saul:

Re: MSW Combustor Emission Tests for Westinghouse

In response to your questions dated November 1, 1989, the following comments are listed in the order of the questions, about Westinghouse's testing at the MSW combustion facility in Bay County, Florida.

- A. Westinghouse had permission from DER to operate the units in excess of the permitted charging rates, for a limited time only, to meet contractual agreements made between Westinghouse and Bay County officials concerning steam rates/electrical output.
- B. Testing for the different pollutants were conducted at different times, with different quantities of excess air for any given load of MSW.
- C. Test results, from initial compliance tests, for both units are in the DER main files in Tallahassee, Florida.
- D. The Division of Air Resources Management no longer conducts it's own compliance testing due to lack of staff and funding. However, a DER representative is usually present during compliance testing.
- E. Compliance tests are normally scheduled by the industry at a time that operations are representative of normal operation.
- F. DER investigates non-compliant test results to determine possible reasons and to take appropriate enforcement action.
- G. I have not been able to readily locate the test results for Mercury for the late April period.
- H. The pages not attached to the report/results sent to you, discuss the summary sent to you.

Page 2
November 27, 1989

I. When I visited the Bay County facility, from the nearest access point to the facility, the noise levels were low. I am not sure if loudness tests have been conducted.

I hope that these responses are of help. I regret that I could not dedicate more time to research into various related aspects.

Sincerely,



Pradeep Raval
Engineer
Bureau of Air Regulation

PR/plm

Andrew
Saul
P.O. Box 196
Moyler
Rose Valley
PA 19065

RECEIVED
NOV 3 1989
DER-BAQM

P.U.,
Pls see if
this is OK
R

Dear Mr. Reed,

I enjoyed talking with you several weeks ago and I thank you for sending Westinghouse's letter to Clair Farny, dated March 31, 1989 on the test results for Unit 2. I have several questions, which I would appreciate if you could help out on.

A. Why was Westinghouse running the unit above its design capacity of 255 TWh/day?

B. Were the CO, VOC's + NOx test taken at the same time or at least before any adjustments or excess air could be made?

C. Do you have any test results for unit 1?

D. Why didn't the Department do the testing itself or at least supervise the testing firm, checking out the calibration on the equipment, etc? Maybe I am unfairly suspicious, but you will admit that it is in the testing firm's best interest that this facility pass its tests.

E. It also appears that Westinghouse set the time and conditions for the tests. that seems irregular.

F. Any Department comment on test 0, I believe, when the results for CO + NOx/VOC were significantly out of line.

G. Would you send me the report of the tests done for Mercury, etc that Westinghouse expected to run in late April.

H. There appears to be several pages missing from the report you sent me.

I. Finally do you have any loudness tests run on this facility. A woman half a mile from the York Co, Pa. plant is having trouble sleeping because of the noise.

Thanks for your help. Sincerely, Andy Saul



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

RECEIVED

OCT 16 1989

DER-BAQM

OCT 10 1989

4APT-APB-cdw

Ms. Patricia G. Adams, Planner
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee Florida 32399-2400

RE: Bay County Resource Management Center (PSD-FL-129)

Dear Ms. Adams:

We have received your September 19, 1989, letter transmitting a copy of Bay County's request to modify the above referenced PSD permit. We have no comments to offer on this proposed action.

Thank you for the opportunity to provide our input in this action.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: P. Raval
CHF/BT

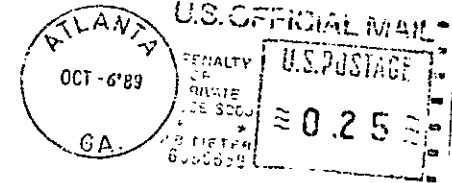
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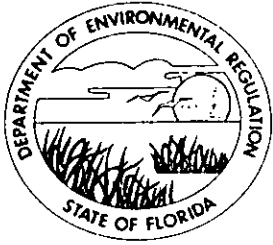
UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

AIR-4

Ms. Patricia G. Adams, Planner
Bureau of Air Regulation
Florida Dept. of Envirn. Regulation
Twin Towers Office Building
~~2600 Blair Stone Road~~
Tallahassee, FL 32399-2400





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

September 19, 1989

Mrs. Chris Shaver, Chief
Policy, Planning and Permit Review Branch
Dept. of Interior, National Park Service
Post Office Box 25287
Denver, Colorado 80225

Dear Mrs. Shaver:

RE: Bay County Resource Management Center
PSD-FL-129

Enclosed for your review and comment is a request to modify the above referenced PSD permit. If you have any comments or questions, please contact Pradeep Raval, Barry Andrews, or Tom Rogers at the above address or at (904)488-1344.

Sincerely,

Patricia G. Adams

Planner

Bureau of Air Regulation

/pa

Enclosure



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

September 19, 1989

Mr. Wayne Aronson, Chief
Program Support Section
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Bay County Resource Management Center
PSD-FL-129

Enclosed for your review and comment is a request to modify the above referenced PSD permit. If you have any comments or questions, please contact Pradeep Raval, Barry Andrews, or Tom Rogers at the above address or at (904)488-1344.

Sincerely,

Patricia G. Adams

Planner

Bureau of Air Regulation

/pa

Enclosure