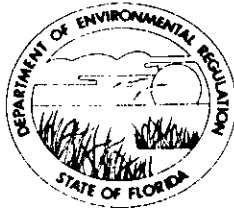


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

April 16, 1984

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

F. S. Pollier/J. D. Phillips
Westinghouse Electric Corporation
Waste Technology Services Division
P. O. Box 10864
Pittsburgh, Pennsylvania 15236

Re: Bay County Resource Recovery Facility,
Air Construction Permits: AC 03-84703, and AC 03-84704

Dear Mr. Pollier:

The Bureau of Air Quality Management received your applications on March 26, 1984, for construction permits of two MSW-fired incinerators in Panama City, Florida. After reviewing these applications, the bureau has determined both applications to be incomplete. Before the applications can be further processed, the bureau has comments and requires additional information for each application as following:

1. According to EPA's document, if the resource recovery facility has a charging rate greater than 50 tons per day and burns solid waste, it would be subject to the incinerator NSPS. Therefore, your proposed new sources (350 tons/day) are subject to Subpart E, NSPS. Section IV of the application is applicable.
2. The proposed facility is a major facility based on the Table 500-1, Major Facility Categories, in Chapter 17-2. Therefore, the state PSD requirement applies to this facility according to FAC Rule 17-2.500(2)(d)2. Submit the necessary information and data for BACT analysis review. Also submit an air quality impact analysis to include an analysis of existing air quality, a PSD increment analysis, a National Ambient Air Quality Standards (NAAQS) analysis and an analysis of impact on soils, vegetation and visibility and growth related air quality impacts.

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3. Provide all information on the turbine generators including, but not limited to, rating, manufacturer, and efficiency.
4. Will the Bay County Board of County Commissioners or the selected vendor operate this resource recovery facility?
5. Submit a vendor's guarantee that the two proposed ESPs will be capable of controlling particulate emissions to 0.02 gr/dscf corrected to 12% CO₂ when firing MSW, wood chips or both.
6. When burning wood chips in the incinerators, what is the expected resistivity (ohm/centimeter) of the fly ash?
7. What percent (by weight) of the fly ash will be less than 10 microns when burning wood chips? What percent of the fly ash will be less than 5 microns?
8. When burning wood chips, there is the possibility of a fire hazard in the ESP. What precautions will be taken to avoid such a possibility?
9. The air emission tests at Gallatin, TN indicate that NRT fuel behaves differently in the O'Connor Rotary Combustor than raw waste. Will there be any difference when burning wood chips?
10. Will each rotary combustor have the capability to be operated under automatic combustion control (ACC)?
11. Attachment 11.A. in your application refers to the baghouse failure at Gallatin, TN. The control device at Gallatin was a Apitron electrostatically-assisted fabric filter. Submit your data that indicated the baghouse was at fault, not the ESP.
12. Cooper Engineers tested two 165 TPD units (in Japan) with an air pollution control system consisting of a TESI dry scrubber, dry venturi and baghouse. The


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preliminary test results indicate: 99% plus reduction in particulate, HCl gases, and SO₂ emissions; 70% plus reduction in HF gases; 30% reduction in mercury. Submit economic, energy, and environmental impact analysis for the comparison between this system and the control system you proposed on the application.

13. Will your proposed sources burn any sludge from any wastewater treatment plant?
14. Submit fuel sample analysis reports on the proposed fuels: MSW and wood chips. The SO₂ and Pb emissions listed in your application seem much lower than average.
15. Submit revised applications to replace the current applications, the revised ones should include all corrections and additional information required by items 1 thru 14 on this letter.

When the revised applications are received, we will resume processing your applications. If you have any questions on the information we request, please write me at the above address or call Bob King, Review Engineer, at (904)488-1344. Cleve Holladay should be called on any question related to modeling.

Sincerely,


C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality Management

CHF/BK/s

cc: Jack Preece
Peter Cunningham
Alan Richter
Cleve Holladay

No. 0158265
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED—
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

SENT TO F. S. Pollier		
STREET AND NO.		
P.O., STATE AND ZIP CODE		
POSTAGE	\$	
CERTIFIED FEE	¢	
SPECIAL DELIVERY	¢	
RESTRICTED DELIVERY	¢	
OPTIONAL SERVICES RETURN RECEIPT SERVICE	SHOW TO WHOM AND DATE DELIVERED	¢
	SHOW TO WHOM, DATE, AND ADDRESS OF DELIVERY	¢
	SHOW TO WHOM AND DATE DELIVERED WITH RESTRICTED DELIVERY	¢
	SHOW TO WHOM, DATE AND ADDRESS OF DELIVERY WITH RESTRICTED DELIVERY	¢
TOTAL POSTAGE AND FEES	\$	
POSTMARK OR DATE 4/18/84		

PS Form 3800, Apr. 1976

PS Form 3811, Jan. 1979

1. SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

2. The following service is requested (check one.)
 Show to whom and date delivered.....
 Show to whom, date and address of delivery.....
 RESTRICTED DELIVERY
 Show to whom and date delivered.....
 RESTRICTED DELIVERY
 Show to whom, date, and address of delivery.....

(CONSULT POSTMASTER FOR FEES)

3. ARTICLE ADDRESSED TO:
 F. S. Pollier
 Westinghouse Electric Corp.
 P. O. Box 10864
 Pittsburgh, Penn. 15236

4. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 _____ 0158265 _____

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
Rennis J. Ch...

5. DATE OF DELIVERY
 APR 23 1984

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE: _____
 USPS CLERK'S INITIALS _____

RETURN RECEIPT FOR REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-459