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Wheelabrator South Broward Inc.

Thomas D. Kirk
Plant Manager

230329

MAR 21 1996

March 13, 1996

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MAILROOM # 2

Mr. Clair Fancy
Division of Air Resources Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

CERTIFIED #P 171 358 692
RETURN RECEIPT REQUESTED

Re: Wheelabrator South Broward Resource Recovery Facility
Request for Alternative Test Method
PSD-FL-105, PPSC PA 85-21

Dear Mr. Fancy:

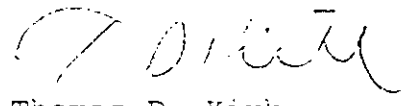
In accordance with Florida Regulation 62-297.620, Wheelabrator South Broward is requesting formal approval for use of an alternate stack testing method. Specifically, we are requesting the use of USEPA continuous monitoring reference test method 7E for oxides of nitrogen (NOx).

Both the PSD permit (PSD FL-105) and the PPSC certificate (PA 85-21) specify the use of USEPA Method 7. However, Florida Rule 62-297.401 has been revised to directly adopt USEPA Method 7E. The USEPA continuous monitoring based reference test method will provide equivalent, if not more representative, NOx emission data. Wheelabrator currently is using USEPA Methods 3A, 6C and 7E at all of our other resource recovery facilities. Additionally, Method 7E was approved by the Department on October 4, 1991 for use at the Wheelabrator North Broward Resource recovery facility, an identical facility. This approval is attached for your reference. USEPA Methods 3A and 6C were approved for stack testing at South Broward in the April 1995 modification to the PPSC. However, Method 7E may have been inadvertently omitted.

I trust this information is sufficient for you to approve the request for the alternative test method.

If further information is required, or if you have any questions, please contact myself or Chuck Faller at 954-581-6606.

Very truly yours,



Thomas D. Kirk
Plant Manager

960313.TDK.ch

cc: Tim Porter
Chuck Faller