

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN RE: SITE CERTIFICATION,)
 NORTH BROWARD COUNTY))
 RESOURCE RECOVERY) DEP CASE NO. PA 86-22
 PROJECT))
))
_____)

PROPOSED AGREEMENT FOR MODIFICATION
OF SITE CERTIFICATION, INCLUDING
ADDITIONAL CONDITIONS OF CERTIFICATION,
FOR ASH REUSE PROCESS FACILITY

4/18/94

I.

Wheelabrator North Broward Inc. (WNB), hereby requests a modification of the site certification, including conditions of certification, for the North Broward County Resource Recovery Project pursuant to Section 403.516.(1)(b), Florida Statutes (F.S.) and Rule 17-17.211, Florida Administrative Code (F.A.C.). Those provisions authorize the Department of Environmental Protection (DEP) to modify the certification after public notice and opportunity for review by the public and by the parties to the original certification proceeding and upon no objection to the proposed modification being raised by those persons. This agreement for modification would authorize the construction and operation of an ash reuse processing facility to be located within the certified Project site to facilitate the recycling of municipal

solid waste combustor ash residue. In addition, WNB proposes to incorporate into the certification the relevant conditions contained in Department Permit Number AO 06-208187 contained in Appendix B of this submittal, which was previously issued for an onsite lime silo and ash handling system. WNB also is proposing to include in the conditions of certification an additional condition addressing testing of ash residue as previously suggested by the Department of Environmental Protection. In support of this modification, WNB states:

II.

On March 9, 1987, a final Site Certification Order was issued by the Siting Board, pursuant to Chapter 403, Part II, F.S., authorizing the construction and operation of the North Broward Resource Recovery Project, subject to the provisions of the certification order and to the conditions of certification included in that order. Subsequent modifications of site certification were issued on April 12, 1988 and February 1, 1989 to revise the project site layout and the air emissions limits in conformance with the separate prevention of significant deterioration permit based upon the installation of acid gas scrubbers at the Project. That certification, as modified, authorized the construction and operation of a mass-burn resource recovery facility at a site in Broward County, Florida. The facility came on line in June of 1991. All tests demonstrating facility compliance were completed on October 10, 1991, and the facility has been operating in compliance with all operating permits since that time. The

} Concerned
existing
equipment
v.s.
new
equipment

facility converts up to 2419 tons per day of municipal solid waste to electricity.

WNB has identified several additional needed modifications to the certification including additional conditions of certification to allow construction and operation of a new ash processing facility within the certified site and to incorporate several recent regulatory authorizations for the Project.

this new facility is not part of the power generation process, i.e. not subject to certification per se?

On May 14, 1992, the Department of Environmental Protection issued to WNB an operation permit No. AO 06-208187 for a 236 ton lime storage silo and an ash handling system. Copies of that permit are contained in Appendix B of this Request for Modification of Certification. WNB requests that the non-procedural terms and conditions of that permit be incorporated into this permit, whereupon WNB would return the issued permit to the Department. Such consolidation of that permit authorization into the certification will place all of the relevant state-imposed limitations and conditions for the Project into a single authorization. The proposed conditions of certification attached hereto reflect the pertinent conditions from that existing permit.

The Department of Environmental Protection has recently indicated that the required testing of ash residue from the Project should be revised during the next certification modification to allow use of a revised test under Rule 17-702, FAC. A copy of that letter is included in Appendix C of the Modification Request.

Separate issue - NOT RELATED TO CONSTRUCTION OF A NEW FACILITY.

III.

The ash reuse processing facility will be constructed on a

less than one-acre parcel of the existing site, adjacent to the existing resource recovery units. The proposed enclosed facility will process ash from the existing units for use as landfill cover or, as markets develop, for use as a construction aggregate. Such uses have been approved by the Department of Environmental Protection as indicated in the attached appendix of this modification request. Such recycling of ash will reduce the amount of material currently being landfilled, extending the useful life of the landfill. Minimal offsite and onsite impacts will occur, principally due to the development and operation of the small project site. No changes to other onsite facilities will be required as a result of the project. The details of the project and its impacts are described in this Request for Modification of Site Certification.

NOT A
PART OF
THE POWER
GENERATING
PROCESS.

IV.

WNB proposes that additional and modified conditions of certification be imposed as part of the approval of this modification. A proposed set of revised and additional conditions of certification is appended to this request, which incorporates conditions from the previously issued Department air operation permit for the lime silo and ash handling system. These conditions address principally the air emissions of particulate matter from the existing ash handling system and the proposed new ash treatment facility. A condition to address the revised testing of ash residue is also proposed.

This could be issued as a
MODIF. to SITE CERTIF.

Request For Relief

Accordingly, Wheelabrator North Broward, Inc. requests that


1. All parties to the original certification proceeding agree to, or otherwise do not object to, this proposed modification and the attached additional provisions of the certification and the conditions of certification within thirty (30) days of submittal of this proposed Agreement, as provided for in Section 403.516(1) (b), F.S.;

2. Upon no objection being raised by the parties as provided above or by a substantially affected person within forty-five (45) days of public notice of this proposed modification, the Department of Environmental Protection issue an order modifying the terms and conditions of the certification, pursuant to Section 403.516.(1) (b), F.S., and incorporating the proposed additional and modified conditions of certification; and

3. The Department of Environmental Protection grant such other relief as may be appropriate, including necessary additional conditions of certification proposed by agency parties.

Respectfully submitted this 18th day of April, 1994.

HOPPING BOYD GREEN & SAMS


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Attorney for Wheelabrator
North Broward, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing and attachment
have been furnished to the following on this 18th day of

April, 1994:

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Attorney

Proposed Revised and Additional Conditions of Certification

**North Broward Resource Recovery Facility
PA 86-22**

1. **ADDITIONAL AUTHORIZED FACILITIES:**

Ash Handling System Particulate Control¹

Particulate emissions from the ash handling system are controlled by a baghouse with an outlet grain loading not to exceed 0.01 gr/dscf or 3 tons per year.

Lime Silo Particulate Control¹

Particulate emissions from the unloading of pebble lime into a storage silo are controlled with a baghouse having an outlet loading design not to exceed 0.021 tons/per year.

Ash Reuse Process Facility

Particulate emissions from the ash processing addition will be controlled using a baghouse system with a minimum removal efficiency of 99.9%.

2. **REVISED CONDITIONS OF CERTIFICATION:**

Condition of Certification XIV., E.5., Solid/Hazardous Waste is revised to read as follows:

Ash, prior to transport to the landfill or processed into landfill daily cover or construction aggregate shall be stored in an enclosed building on an impervious surface or by another method approved by the Southeast District Office. Final disposal of the unprocessed ash shall be into ~~the~~ a lined landfill or by another method approved by the Southeast District Office. Any leachate generated within the building shall be collected and reused within the facility or disposed of by a method approved by the Southeast District Office. The Southeast District Office shall notify the SFWMD of the plans and specifications regarding the above referenced method.

Conditions XIV., E. Solid/Hazardous Waste, 8 is revised to read as follows:

8. The sampling analysis and reporting of results of municipal solid waste combustor ash residue will be in accordance with F.A.C. Chapter 17-702.

¹ Previously permitted, constructed and placed in operation under DEP permit AO 06-208187. Permit contained in Appendix B of Modification Request

9. Deleted.

10. Deleted.

Conditions XIV., E. Solid/Hazardous Waste 12 is added to read as follows:

12. Chemical and physical properties of the processed ash shall be determined and reported in accordance with F.A.C. Chapter 17-702 and reported to the department.

3. ADDITIONAL SPECIFIC CONDITIONS OF CERTIFICATION:

Condition XIV., A. Air, 6. is added to read as follows:

6. Ash Handling, Reuse Facility, Lime Silo²

- a. Wheelabrator North Broward, Inc.'s fly ash handling system and the lime silo shall be allowed to operate continuously (i.e. 8,760 hrs./yr.).
- b. Particulate emissions from the fly ash handling system, and lime silo baghouses shall not exceed 0.01 gr./dscf, nor 3.0 tons/year and 0.021 tons/year, respectively.
- c. The ash reuse facility shall be allowed to operate up to 6000 hrs/yr at a maximum process rate of 260,000 lb/hr of ash residue.³
- d. Particulate emissions from the ash reuse process facility shall not exceed 0.01 gr./dscf. nor 11.7 tons/yr.³
- e. Visible emissions from the fly ash handling system and the ash reuse process facility shall not exceed 5% opacity.
- f. Visible emissions from the lime silo baghouse shall not exceed 5% opacity.
- g. Compliance with the particulate and visible emissions test shall be determined annually using EPA Methods 1, 2, 3, 4, 5 and 9 contained in F.A.C. Rule 17-297. The visible emissions test for the fly ash handling system and ash

² Unless otherwise indicated, these proposed specific conditions are consistent with the existing permit conditions in DEP permit AO 06-208187. Permit contained in Appendix B of Modification Request.

³ New specific condition not contained in DEP permit AO 06-208187. Permit can be found in Appendix B of Modification Request.

processing facility conducted along with the particulate tests shall be for at least 60 minutes. The visible emissions tests for the lime silo shall be conducted for the entire truck unloading operation. The minimum requirements for stack sampling facilities, source sampling and reporting shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A. A stack drawing showing sampling locations for the proposed ash processing facility baghouse shall be submitted to the Department at least 90 days prior to testing.

- h. The maximum allowable emission rate for particulate matter for the lime silo is 0.021 tons/year. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Department, pursuant to the authority granted under F.A.C. Rule 17-2.700(3)(d), hereby waives the requirement for a stack test. The alternate standard set forth by this provision establishes a visible emission not to exceed an opacity of 5%.
- i. Should the Department have any reason to believe the particulate emission standard is not being met for the lime silo, the Department may require that compliance with the particulate emission standards be demonstrated by testing in accordance with F.A.C. Rule 17-297.
- j. No objectionable odors from this facility will be allowed.
- k. The Southeast District Office of the DEP shall be given written notice at least 15 days prior to compliance testing.
- l. All conveyor loading points, transfer points and all ash processing equipment shall be properly enclosed. The facility shall be operated by personnel properly trained for the equipment herein. The Department shall be notified in writing on how the facility will be staffed and trained.
- m. Reasonable precautions shall be taken during operation to prevent and control generation of unconfined emissions of particulate matter in accordance with the provisions in F.A.C. Rule 17-2.610(3). Such reasonable precautions shall be: application of water or chemicals to control fugitive emissions from activities such as vehicular movement, loading, unloading, storage and handling.
- n. The permittee shall comply with all applicable provisions of Florida Administrative Code Chapters 17-4 and 17-210 to 297.