

cc Fancy Goldman Donelan

WHEELABRATOR NORTH BROWARD INC.

2600 N.W. 48th Street
Pompano Beach, FL 33073
305-971-8701 - Tel.
305-971-8703 - Fax

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JUN 21 1993

June 7, 1993

CERTIFIED MAIL # P 104 041
Division of Air Resources Management

Mr. Hamilton S. Oven, P.E.
Administrator, Siting Coordination Office
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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JUN 15 1993

RE: North Broward County Resource Recovery Project
PPSC: 86-22, PSD-FL-112

D. E. R.
SITING COORDINATION

Dear Buck:

This correspondence is submitted to request the Department's guidance and assistance regarding an approach to change the short term heat input, limitation for each Resource Recovery Boiler at the North Broward Facility.

The emergency modification granted by the department on 9/1/92 temporarily increased the maximum heat input rate for each Resource Recovery Boiler, to the actual design heat input for the North Broward Facility of 323.73×10^6 Btu/hr. This design rate is identical to that allowed by the South Broward facility (P.A. 85-21). The current permitted heat input of 302.5×10^6 Btu/hr is an artifact of adjusting the maximum heat input for the original site certification of four units to three units (i.e., $226.9 \times 10^6 \times 4/3 = 302.5 \times 10^6$ Btu/hr). As previously discussed, the facility was constructed identical to the South Broward facility, but is currently operated at this lower capacity.

Wheelabrator North Broward Inc. would like the ability to operate at the design heat input rate of 323.73×10^6 Btu/hr. However, prior to requesting a modification of the certification pursuant to 403.516 Florida Statutes, we request a determination regarding our proposed approach. It is desired to modify Specific Condition XIV.A.1 as follows:

c. The Resource Recovery Boilers shall not be loaded to excess of their rated nameplate capacity of 71,917 pounds of MSW per hour or 323.73×10^6 Btu per hour each. The annual heat input for the entire facility shall not exceed $7,949,700 \times 10^6$ Btu. The temperature of the flue gas exiting the combustion chamber of the resource recovery boilers shall be equal to or greater than 1800 degrees F.

Retaining the authorized annual heat input for the facility of $7,949,700 \times 10^6$ Btu/hr (i.e 302.5×10^6 Btu/hr x 3 units x 8760 hr/yr) will not result in an increase of permitted annual emissions. Using this approach, it is our understanding that both the New Source Performance Standards (NSPS), Subpart Ea and Prevention of Significant Deterioration (PSD) would not be applicable.

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The change in the permitted short term heat input is accomplished without any capital expenditure for the facility. In addition, as stated above, this will not result in an increase of annual permitted emissions and therefore, the increase in the short term heat input would not be a "modification" under the PSD Regulations.

We would like to meet with you at your earliest convenience to discuss the final details for seeking the requested change.

Sincerely,



Paul F. Claerbout
Plant Manager

PFC521/dep

cc: E. Selya
EHS 3.12 FDER
EHS 1.1.1
F. Ferraro WESI
T. Porter WESI
M. Williams FDER, S.E.
W. Ferguson WESI
T. Kirk WSB
T. Henderson BCOIWM