Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 4, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. James Carter
City Manager
City of Gretna
U.S. Highway 90
Post Office Drawer A
Gretna, FL 32332

Dear Mr. Carter:

RE: City of Gretna Solid Waste Combustor
Air Permit Application AC 20-212334

The Bureau of Air Regulation has reviewed the above referenced permit application and determined this project is subject to review under Prevention of Significant Deterioration (PSD) regulations. Since the processing fee for a PSD review is $7500, an additional $2500 fee is required before further processing can take place. If you have any questions, please write to me at the above address or call me at (904)488-1344.

Sincerely,

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

CHF/pa

cc: E. Middleswart, NW District
D. Buff, P.E.

KBN

May 11, 1992

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

Re: City of Gretna Solid Waste Combustor
Air Permit Application AC 20-212334

Dear Mr. Fancy:

I am writing in response to your letter concerning the level of review for the above-referenced permit application, i.e. whether it should be subject to Prevention of Significant Deterioration (PSD) regulations. In discussions with Mr. Bruce Mitchell, this issue was brought about because of the concern that the project will eventually include an additional combustor to burn municipal solid waste (MSW).

For clarification purposes, the following statements can be included as part of the project description for the proposed project:

1. The proposed combustor will be charged with refused-derived fuel (RDF) and tire-derived fuel (TDF), and there will be no burning of MSW (i.e., solid waste taken directly from the tipping floor of the solid waste processing plant).

2. Typically, the solid waste processing plant will be processing approximately 350 to 500 tons per day (TPD) of MSW. The variation of the solid waste processing amount depends largely on the quantity of RDF that can be produced from MSW processing to meet the fuel requirement for the proposed combustor.

3. The proposed facility is a one-phase project that will include only one combustor. The total charging rate for the combustor will be less than 250 TPD.

Therefore, the proposed facility should be reviewed as a non-PSD source because it does qualify for PSD review under the source applicability rules of Chapter 17-2.500 of the Florida Administrative Code. I hope that the above statements can be viewed as acceptable explanation at this juncture for further permitting review of the permit application.

KBN ENGINEERING AND APPLIED SCIENCES, INC.
1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189

Please call me or Tai Tang if you have further questions on this matter.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer

DAB/mlb

cc: B. Mitchell, DER
T. Tang
J. Carter
J. Matthews
Project File

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____ Location: _____

To: _____ Location: _____

To: _____ Location: _____

From: _____ Date: _____

Interoffice Memorandum

TO: Ed Middleswart

FROM: Mirza Baig MB.

DATE: May 14, 1992

SUBJ: City of Gretna Solid Waste Combustor
AC 20-212334, Gadsden County

The Bureau of Air Regulation received the attached response regarding the above referenced permit application. Since the PSD applicability is an issue with this project, Clair Fancy has decided that this application should be processed in Tallahassee. I would like to respond to this letter by May 22. If you have any comments or questions you would like included in the letter, I would appreciate it if you could fax them to me by Wednesday, May 20.

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

May 15, 1992

Hon. Evelyn Rollins, Mayor
City Hall, Corner of Cedar & Beach
City of Gretna, Fl 32332

Hon. Ms Rollins:

RE: City of Gretna Solid Waste Combustor
Air Permit Application AC 20-212334

Since the Bureau of Air Regulation has received clarification from the Engineer of Record for the above referenced project concerning the PSD fee applicability on May 13, 1992 the Department considers this (5/13/92) to be the date application was received.

If you have any comments regarding this please contact Mr. Mirza P. Baig of my staff, phone, (904) 488-1344.

Sincerely,

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

CHF/MPB/pm

cc: E. Middleswart, N.W. Dist.
D. Buff, P.E.
James Carter, City Mgr.

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 15, 1992

Ms. Jewell A. Harper, Chief
Air Enforcement Branch
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30308

Dear Ms. Harper:

RE: City of Gretna, Solid Waste Conbustor
Gadsden County, AC 20-212334

Enclosed for your review is the above referenced air construction permit application. Please forward your comments to the Department's Bureau of Air Regulation by June 5, 1992. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Mirza Baig or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

Patricia G. Adams

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

CHF/pa

Enclosures

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____ Location: _____

To: _____ Location: _____

To: _____ Location: _____

From: _____ Date: _____

Interoffice Memorandum

TO : Mirza Baig

FROM : Ed Middleswart Edm 5/19

DATE : May 19, 1992

SUBJECT: Gretna MSW Project
AC20-212334, Gadsden County

Per our May 19 telecon I am forwarding some initial thoughts regarding possible incompleteness items for this project.

1) Provide emission rates for all pollutants and provide basis for the estimates. Include estimates of all toxic or potentially toxic emissions (such as dioxins, furans, etc.) in addition to pollutants identified in your application.

2) Describe continuous emissions monitoring or control systems to be used to assure that emissions do not exceed emission factor estimates.

3) Identify all surrogate parameters to be monitored to provide reasonable assurance of continuous compliance with all applicable rules and regulations.

4) Describe methods of measuring and monitoring feed rates of RDF and TDF to assure emissions estimates are not exceeded.

EKM:emc

Department of Environmental Regulation

Routing and Transmittal Slip

To: (Name, Office, Location)

1. Mirza Baig, DARM, BAR, Permitting
2. Tom Powers, Room 310C
3.
4.

Remarks:

RECEIVED
MAY 21 1992
Division of Air
Resources Management

From: Ed Middlesworth, NWD Air

Date 5/19/92

Phone SC 695-8364

NALCO FUELTECH

NALCO FUELTECH
Technology for a renewed environment ™

GENE CAPRIOTTI
CONSULTANT

457 CRESTWOOD LANE
NAPLES, FLORIDA 33962

813-775-2249

FAX: 813-775-9325

RECEIVED
MAY 22 1992
Division of Air Resources Management

MAY 20 1992

MR. PRESTON LEWIS
SUPERVISOR AIR PERMITTING
DEPT. ENVIRONMENTAL REGULATIONS
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32399-2400

LBN SCR/SNCR CONTROL COMBUSTION

GE-W B&C

RE: NOXOUT PROCESS
SNCR NOX CONTROL

DEAR MR. LEWIS,

I APPRECIATE YOUR POSITIVE RESPONSE FOR MORE INFORMATION ABOUT NALCO FUEL TECH'S NOXOUT PROCESS, DURING OUR PHONE CONVERSATION YESTERDAY.

WE ARE HAPPY TO ACCEPT THE OPPORTUNITY TO PROVIDE YOU AND OTHER MEMBERS OF YOUR STAFF WITH ALL AVAILABLE INFORMATION ON THE PROCESS DURING A PRESENTATION TO BE SCHEDULED AT YOUR CONVENIENCE IN EARLY JUNE.

THE PRESENTATION WILL TAKE ABOUT ONE HOUR AND DEPENDING ON QUESTIONS GENERATED, AS MUCH AS TWO HOURS.

WE WILL COVER THE FOLLOWING INFORMATION:

- NALCO FUEL TECH
- DEVELOPMENT OF NOXOUT
- CHEMICAL REACTIONS
- CRITICAL PROCESS PARAMETERS
- APPLICATION
- EXPERIENCE
- COST EFFECTIVENESS

WE WILL REQUIRE AN OVERHEAD PROJECTOR.

IF YOU WOULD ADVISE ME AS SOON AS POSSIBLE OF A SUITABLE TIME DURING THE FIRST TWO WEEKS OF JUNE, WE WILL BE AVAILABLE.

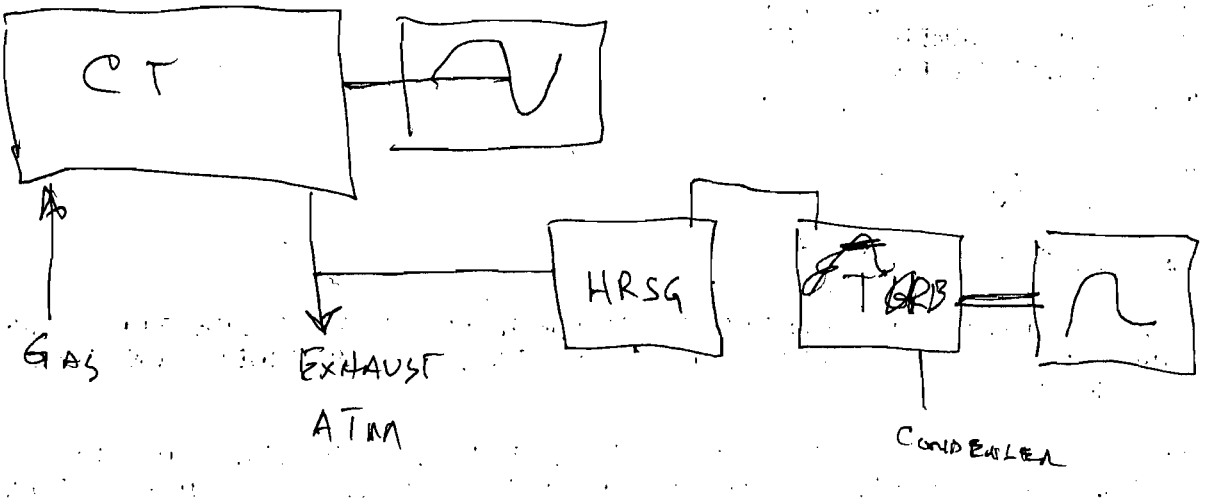
I AM ENCLOSING MY BUSINESS CARD AND IF YOU HAVE ANY QUESTIONS, PLEASE CALL.

VERY TRULY YOURS,

Gene Capriotti

E.J. CAPRIOTTI

COMBINED CYCLE



BACT FLORIDA	GAS	OIL
COMBINED CYCLE		
NO_x	25ppm	42ppm
(LMS600) CO		

BACT NY, VA, WASH, OR., CA	
COMBINED CYCLE	
NO_x	6-9
CO	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

May 26, 1992

MEMORANDUM

SUBJECT: Applicability of Prevention of Significant Deterioration (PSD) and New Source Performance Standards (NSPS) to the Cleveland Electric, Incorporated, Plant in Willoughby, Ohio

FROM: Edward J. Lillis, Chief
Permits Programs Branch, AQMD (MD-15)

TO: George T. Czerniak, Chief
Air Enforcement Branch, Region V

This memorandum responds to your request for a written applicability determination for a Cleveland Electric, Incorporated, facility in Willoughby, Ohio. As discussed below, my staff has determined that this Cleveland Electric facility is subject to a 100 tons per year (tpy), major source applicability threshold for the PSD requirements at 40 CFR 51.21. If this facility has commenced construction with a minor source construction permit from Ohio, but without undergoing new source review (NSR), as required by 40 CFR 52.21, the source may be in violation of Federal PSD requirements. At this time, the Cleveland Electric Plant does not appear to be subject to the current emissions guideline for municipal waste combustors or NSPS of 40 CFR Part 60, subparts Ca and Ea, respectively. This response has been coordinated with the Compliance Monitoring Branch of the Stationary Source Compliance Division (SSCD), to whom your applicability request was addressed, and with the Standards Development Branch of the Emission Standards Division (ESD) on the applicability of NSPS and emissions guidelines.

In reviewing the information forwarded to our office, we have determined that, for PSD applicability purposes, the Cleveland Electric facility is both a municipal waste incinerator and a fuel conversion plant, as listed at 40 CFR 52.21(b)(1)(c)(iii), and would be major if the source "...emits, or has the potential to emit, 100 tpy of any pollutant subject to regulation under the (Clean Air) Act". The facility appears to meet the criteria for both categories by disposing of municipal

waste using combustion and by producing a low heat value fuel gas. While there are no definitions in the PSD regulations for "municipal waste incinerator," "fuel conversion plant," and other categories listed as subject to the 100 tpy, major source threshold, the Environmental Protection Agency (EPA) has relied on case-by-case determinations in assessing source applicability. These assessments are based on precedents established by NSPS and other regulatory definitions, as well as technical analysis of the character and functions of both the proposed source and the listed source categories. We have used these guidelines in determining that the Cleveland Electric plant is considered listed under two source categories for which the lower PSD applicability threshold applies.

The NSPS regulations define "municipal waste combustor" at 40 CFR 60.51a to mean "... any device that combusts solid, liquid, or gasified (municipal solid waste) including, but not limited to, field-erected incinerators (with or without heat recovery), modular incinerators (starved air or excess air), furnaces (whether suspension-fired, grate-fired, mass-fired, or fluidized bed-fired) and gasification/combustion units." The emissions guideline of subpart Ca also incorporates this definition by reference (40 CFR 60.31a). On page 10 of Cleveland Electric's December 20, 1991 permit application submittal, the source is described as consisting of seven units, charging 50 tons per day (tpd) per unit, "...converting municipal solid waste into...fuel gas." For NSPS purposes, the Cleveland Electric source is a municipal waste combustor and would be subject to the NSPS standards of 40 CFR Part 60, subpart Ea, if each unit were not below the 250 tpd of refuse combustion capacity per unit applicability threshold of subpart Ea [40 CFR 60.50a(a)].

A municipal waste incinerator "combusts" solid waste and thus is functionally synonymous with municipal waste combustor. Accordingly, EPA has adopted the NSPS definition of municipal waste combustor for determining if a source is subject to the 100 tpy applicability threshold for PSD in section 169(1) of the CAA. Section 169(1), as amended by Section 305(b) of the CAA Amendments of 1990 [P.L. 101-549, sec. 305(b)], lists "municipal incinerators capable of charging more than 50 tons of refuse per day" as being subject to the 100 ton emissions threshold.[1] Under EPA's sourcewide plant definition [40 CFR 52.21(b)(5 and 6)], the 50 tpd charging rate applies to the sum of all units at the Cleveland Electric facility (which will be capable of

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[1] The EPA considers the revised definition to be effective by operation of law on November 15, 1990.

charging a total of 350 tons of refuse per day). Therefore, the Cleveland Electric facility will be a major source for PSD purposes if the source emits, or has the potential to emit, 100 tpy of any pollutant regulated under the CAA [except HAP's listed under §112(b) of the CAA].

The production of low heat value fuel gas at the Cleveland Electric facility also classifies the source as a fuel conversion plant. Fuel conversion plants obviously include those plants which accomplish a change in state (e.g., solid to liquid to gas) for a fuel. This definition includes conversion of the following fuels: fossil (e.g., coal or oil shale); biomass (e.g., wood or peat); and anthropogenic (e.g., municipal waste derived fuel and inorganic fuel). The majority of such sources are likely to accomplish these changes through either gasification, liquefaction, or solidification. The category of fuel conversion plants may include, but is not limited to, some types of sources within standard industrial classifications 1311, 2819, 2969, 2421, and 2999. Generally, however, applicability for this source category is determined by whether a facility changes the state (e.g., solid to gas) or form (e.g., process sawdust into a pellet) of a fuel. Therefore, the Cleveland Electric facility fits into the fuel conversion plant category as well. In both cases, as a municipal waste incinerator and as a fuel conversion plant, the source is major and subject to PSD requirements if the source has the potential to emit 100 tpy of a regulated pollutant other than a HAP.

If you have any questions concerning our PSD applicability determination, please contact Bill Lamason of my staff at (919) 541-5374. Questions concerning NSPS should be directed to Walt Stevenson, ESD, at (919) 541-5264. On compliance issues, you may contact Clara Poffenberger, SSCD, at (703) 308-8709.

cc: NSR Contacts, EPA Regions I-X.
K. Berry, AQMD
C. Poffenburger, SSCD
W. Stevenson, ESD
B. Tyndall, OGC
J. Domike, OE
B. Lamason, PPB

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

4APT-AEB

JUL - 8 1992

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

RE: City of Gretna Solid Waste Combustor
(Application No. AC 20-212334)

Dear Mr. Fancy:

This is to acknowledge receipt of the air permit application, subsequent correspondence, and additional information packages for the above referenced facility. The proposed project consists of one Auger combustor, with a maximum heat input rate of 128.9 mmBtu per hour, to be fired with refuse derived fuel (RDF) and tire derived fuel (TDF). The unit will have a maximum capacity of 244.95 tons per day when charged with 80% RDF and 20% TDF. The heat generated from the combustor will be used to produce steam to power a 7.4 megawatt generator.

The City of Gretna has submitted this proposed facility for review as a non-Prevention of Significant Deterioration (PSD) source. The applicant proposes to limit NO_x emissions through combustion control and efficient firing of the proposed Auger combustor, to limit SO_2, HCl, and H_2SO_4 mist emissions through the use of a dry lime injection/fabric filter or spray dryer/fabric filter system, to limit CO and VOC emissions through good combustion techniques, and to limit PM/PM_{10}, As, Be, F, Hg, and Pb emissions through the use of a fabric filter system.

We have reviewed the package as submitted and have the following comments on PSD applicability and modeling/monitoring:

PSD Applicability

Contrary to the contentions of the applicant, the proposed facility is subject to full PSD review, on the basis of several definitive factors. From Section 129 of the Clean Air Act Amendments of 1990 (CAAA), municipal waste is defined as refuse (and refuse derive fuel) collected from the general public and from residential, commercial, institutional, and industrial sources. A solid waste incineration unit is defined as a distinct operating unit of any facility which combusts any solid waste material from commercial or industrial establishments or the general public. Thus, the proposed facility is, by definition, a municipal solid waste incinerator.

According to Section 169 of the CAAA, a major emitting facility is defined as "[a]ny of the following stationary sources of air pollutants which emit or have the potential to emit one hundred tons per year of more of any air pollutant from the following types of stationary sources." The list includes "municipal incinerators capable of charging more than fifty tons of refuse per day." Section 165 of the CAAA mandates that all major emitting facilities must receive a preconstruction permit (i.e. a PSD permit). On the basis of these factors, the proposed facility is subject to PSD review and must submit a PSD permit application to FDER. The applicant has the potential to emit significant levels of emissions for a number of regulated pollutants, consequently they are required to complete a Best Available Control Technology (BACT) review for the following pollutants: NO_x, SO_2, CO, PM/PM_{10}, HCl, Pb, dioxins and furans, and As.

There is additional justification for subjecting the applicant to PSD permit review. According to the application package submitted by the City of Gretna, the proposed facility will have the capacity to charge up to 245 tpd, in a combination of TDF and RDF. This would make the facility applicable to PSD review by virtue of EPA's revised definition of a municipal waste combustor, which became effective by operation of law on November 15, 1990. This decision was reiterated during an applicability determination involving the Cleveland Electric facility, as discussed in an EPA memorandum, dated May 26, 1992 (Enclosed). This memorandum, between Edward J. Lillis, Chief of the Permits Programs Branch in EPA's Office of Air Quality Planning and Standards and George T. Czerniak, Chief of the Air Enforcement Branch in EPA Region V, states:

A municipal waste incinerator "combusts" solid waste and thus is functionally synonymous with municipal waste combustor. Accordingly, EPA has adopted the NSPS definition of municipal waste combustor for determining if a source is subject to the 100 tons per year applicability threshold for PSD in section 169(1) of the CAA. Section 169(1), as amended by Section 305(b) of the CAA Amendments of 1990 [P.L. 101-549, sec. 305(b)], lists "municipal incinerators capable of charging more than 50 tons of refuse per day" as being subject to the 100 ton emissions threshold... Therefore, the Cleveland Electric facility will be a major source for PSD purposes if the source emits, or has the potential to emit, 100 tons per year of any pollutant regulated under the CAA [except HAP's listed under Section 112(b) of the CAA].

Modeling/Monitoring

1. The Class I analysis only includes the new source. Additional information should be provided whether there are other increment consuming sources that need to be included in the analysis.

2. On page 27, the wrong upper station (Tallahassee, FL) is listed. The correct station is Waycross, GA.

3. On page 35, the wrong numbers are inserted for the Florida AAQS.

The City of Gretna has not submitted a complete and thorough application for the proposed PSD facility. In conjunction with fulfilling the requirements outlined in the June 12, 1992 correspondence from FDER, the applicant must submit a PSD permit application, including a complete top-down BACT analysis, and correct the previously mentioned modeling/monitoring deficiencies. These steps must be completed prior to further review by EPA staff at Region IV.

Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact either Mr. Lew Nagler for modeling/monitoring or Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

Attachment

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____ Location: _____

To: _____ Location: _____

To: _____ Location: _____

From: _____ Date: _____

Interoffice Memorandum

June 2, 1992

AGENDA FOR JUNE 10, 1992 SEMINAR

Topic: SNCR NOX CONTROL

BY: E. J. Capriotti
Nalco Fuel Tech

A seminar has been scheduled for June 10, 1992 at the BAR'S main conference room (338D), from 9:00 a.m. to 10:30 a.m. Mr. Capriotti plans to cover the following information:

--- Nalco Fuel Tech
--- Development of NOXOUT
--- Chemical Reactions
--- Critical Process Parameters
--- Application
--- Experience
--- Cost Effectiveness

All Permit Engineers, Modelers, Compliance personnel and regulators interested in learning about SNCR NOX Control are encouraged to attend.

Anyone interested in attending this seminar please notify Mirza Baig to ensure that room 338D will have enough space, if not a larger conference room can be found.

June 3, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Honorable Evelyn Rollins, Mayor
City Hall, Corner of Cedar & Beach
City of Gretna, Fl 32332

REF: Gadsden County - A.P.
City of Gretna Resource Recovery Facility
AC 20-212334 (Incinerator)

Dear Ms. Rollins:

The Department has received a permit application to construct a 245 tons/day Municipal Waste Combuster (Incinerator), at the above referenced facility on May 13, 1992 and deemed it incomplete. Please provide the following infprmation:

1. According to the letter dated May 11, 1992 from Mr. David Buff, P.E. the proposed facility will be charged with only (245 TPD) of RDF and TDF. There will be no burning of solid waste taken directly from the tipping floor of the solid waste processing plant. Also the proposed facility is a one-phase project with no future expansion plans. At any time during the operation of this facility if the charging rate reaches or exceeds 250 TPD (20,834 Lbs/Hr) or emission of any regulated pollutant exceeds 250 TPY, according to 40CFR60.15 and Rule 17-2.500(g), F.A.C. NSR requirements (including PSD) will apply to the facility as though construction had not yet

commenced on it. In that case this facility will have to comply with the standards of Subpart Ea and instal additional pollution control devices. Please acknowledge this in your response.

2. How much MSW including waste tires is generated in the City of Gretna ? Do you expect to receive MSW and scrap tires from other sources, and how much from each source ? How much is the tipping fee now and will it increase once this facility becomes operational ? ~~Do you have a~~ firm contract to sell the power generated and the recyclables, if so provide the Dept with a copy of the contracts. ~~What happens to the recyclables if the vendors cannot pick it up for an extended period~~ ? The Department is concerned that the 250 TPD charging limit may be exceeded if a proper response to these questions is not received.

3. Do you expect to receive medical or hazardous waste at this facility, if so how much of each waste will be received ?

4, Submit a make and model No. for the automatic weighing device that feeds the RDF/TDF to the combuster along with the Manufacturer's gaurantee that the weigh scales will always be calibrated to within +or- 2.080 %. If the weigh scales exceed 2.080 % then the charging rate will exceed 250 TPD.

5. The solid waste processing plant is designed to process 500 TPD of MSW. Provide a process flow diagram along with maximum process input rates for this plant. Also provide details of the TIRE de-beading and shredding operations indicating fugitive or other emissions and how they are controlled.

6. Submit a process flow diagram indicating how the two seperate waste streams, the 80-20 and 75-25 mixture of RDF/TDF (heat input ratio) is fed to the combuster, and how can the department be assured that proper heat input ratios are being maintained in each waste stream at all times ?

7. How much steam in Lbs/Hr will be generated and at what pressure and temperature ?

8. Provide detailed drawings of the Auger Combuster System showing the primary and secondary chamber locations and their operating temperatures; location of lime spray injection. Provide material balance for this flow sheet. Which lime injection system do you to install, the dry lime or the spray dryer ?

9. How much natural gas and/or no.2 fuel oil is used in the four auxiliary burners ? What is the maximum sulfur content in these fuels ? Re calculate and submit emission estimates for all pollutants with auxiliary burners in operation.

10. Submit detailed drawings of the following: (a) (Combuster) fabric filter (baghouse), including the specification sheet and (b) the baghouse stack showing sampling location (upstream/downstream distance) and gas flow rates.

11. Submit baghouse specification sheets for the lime silo and flyash storage bin. The Department recommends a filtering area of atleast 250 square feet.

12. How do you propose to control fugitive dust emissions expected from transporting and storage of ashes ?

13. Is the combuster baghouse exhaust fan speed variable or fixed ? Submit the manufacturer's fan (operating) curve.

14. NOX, & SO2, Emissions --- According to the permit application the maximum annual emissions are based on the 1-hour average estimates, but the 1-hour maximum estimates are almost twice the average (for example: NOX 1-hour

annual average is 200 ppm and 1-hour max is 400 ppm; and the SO2 1-hour annual average is 117 ppm and 1-hour maximum is 234 ppm). Do you plan to install continuous emission monitors to demonstrate compliance with the hourly and annual emission rates for NOX, SO2 and CO ? If so submit the make and model No. for these monitors.

15. Submit a plot plan showing the ash transporting and storage system and the roads in the plant yards. How do you plan to control the fugitive emissions generated due to the vehicular traffic ?

June 3, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Honorable Evelyn Rollins, Mayor
City Hall, Corner of Cedar & Beach
City of Gretna, Fl 32332

REF: Gadsden County - A.P.
City of Gretna Resource Recovery Facility
AC 20-212334 (Incinerator)

Dear Ms. Rollins:

The Department has received a permit application to construct a 245 tons/day Municipal Waste Combuster (Incinerator), at the above referenced facility on May 13, 1992 and deemed it incomplete. Please provide the following infprmation:

1. According to the letter dated May 11, 1992 from Mr. David Buff, P.E. the proposed facility will be charged with only (245 TPD) of RDF and TDF. There will be no burning of solid waste taken directly from the tipping floor of the solid waste processing plant. Also the proposed facility is a one-phase project with no future expansion plans. The proposed sourses will be subject to federally enforceable restrictions that will limit the charging rate of the unit to 244.8 TPD (20,400 Lbs/hr) and emissions of regulated pollutants to less than 250 TPY. Pursuant to 40 CFR 60 Subparts A and Ea, any future relaxation of the limits on

charging rate (greater than 20,833 Lbs/hr) will make the facility subject to 40 CFR 60 Subpart Ea. Pursuant to 40 CFR 52.21(r) and Rule 17-2.500(g), F.A.C. , the future relaxation of a restriction on pollutant emissions (of 250 Tons or more a year) will make this facility subject to a full PSD New Source Review (including BACT) , on an "as though never constructed " basis. If there is any potential for the relaxation of restrictions, then it may be to your advantage to consider a full PSD New Source Review and compliance with the requirements of 40 CFR 60 Subpart Ea at this time. Please acknowledge of the implications in writing.

2. How much MSW including waste tires is generated in the City of Gretna ? Do you expect to receive MSW and scrap tires from other sources, who are they and how much from each source ? How much is the tipping fee for each class of waste now and will it increase once this facility becomes operational ? Provide copies of all firm contract(s) or a written statement from potential purchasers, acknowledging their intent to consider the purchase of energy and/or recyclables. How will the recyclables be stored ? Provide details on storage of recyclables for the maximum expected volume. The Department is concerned that the 250 TPD charging limit may be exceeded if a satisfactory response to these questions is not received

3. Identify the source and quantity of medical or hazardous that will be received or combusted at this facility. Do you plan to burn any other type of wastes not already identified ?

4. Submit a make and model No. for the automatic weighing device that feeds the RDF/TDF to the combuster along with the Manufacturer's gaurantee that the weigh scales will always be calibrated to within +or- 2.0 %. If the weigh scales exceed 2.0 % then the charging rate will exceed 250 TPD.

5. The solid waste processing plant is designed to process 500 TPD of MSW. Provide a process flow diagram along with maximum process input rates for this plant. Also provide details of the tire de-beading and shredding operations indicating fugitive or other emissions and how they are controlled. What is the form of RDF/TDF (pellitized, bailed, or briquated)?

6. Submit a process flow diagram indicating how the two seperate waste streams, the 80-20 and 75-25 mixture of RDF/TDF (heat input ratio) is fed to the combuster, and how can the department be assured that proper heat input ratios are being maintained in each waste stream at all times ?

7. What is the quantity, pressure, and temperature of the steam that you propose to generate ? Also provide us with the details of the steam turbine that you propose to install.

8. Provide detailed drawings of the Auger Combuster System showing the primary and secondary chamber locations and their operating temperatures; location of lime spray injection. Provide material balance for this flow sheet. Which lime injection system do you to install, the dry lime or the spray dryer ?

9. How much natural gas and/or no.2 fuel oil is used in the four auxiliary burners ? What is the maximum sulfur content in these fuels ? Re calculate and submit emission estimates for all pollutants with auxiliary burners in operation.

10. Submit detailed drawings of the following: (a) (Combuster) fabric filter (baghouse), including the specification sheet and (b) the baghouse stack showing sampling location (upstream/downstream distance) and gas flow rates.

11. Submit baghouse specification sheets for the lime silo and flyash storage bin. Please submit the preliminary engineering calculations that were used to determine that the proposed filtration area of the baghouses will be adequate.The Department recommends a filtering area of atleast 250 square feet for the lime silo baghouse.

12. How do you propose to control fugitive dust emissions expected from transporting and storage of ashes ?

13. Please describe the type of fans that will be used in the proposed incinerator system. Explain wether the proposed fans will be fixed speed or variable speed fans and provide copies of the manufacturer's curve for each fan for the proposed system.

14. NOX, SO2, & CO Emissions --- Based on the permit application the proposed maximum 1-hour emissions of NOX and SO2 are almost twice the estimated annual average emissions. The maximum hourly emissions of NOX & SO2 would be sufficient to trigger PSD New Source Review if the source were continuously operated at the maximum rate. Please provide and describe the mechanism that will be used to provide the Department with continuous reasonable

assurance (i.e., continuous emission monitoring) that the emissions of NOX, SO2, & CO will not reach the levels that would trigger a full PSD New Source Review. Submit the make and model number of any monitors that you propose to instal

15. Submit a plot plan showing the ash transporting and storage system and the roads in the plant yards. How do you plan to control the fugitive emissions generated due to the vehicular traffic ?

16. Provide emission rates for all pollutants and provide basis for the estimates. Include estimates of all toxic or potentially toxic emissions (such as dioxins, furans, etc.) in addition to to pollutants identified in your application

17. Please be advised that this facility will require a seperate solid waste permit. For details contact the Northwest District office in Pensacola. You may want to contact other Bureaus in the Department for additional permitting requirements.

18. Maximum concentration values for sulfur dioxide emissions in Table 5-5 appear to be in error. Please provide a corrected Table 5-5.

19. See attached sheets.

19. Even though this project is a proposed minor source and is only subject to the provisions of F.A.C. Rule 17-2.520, paragraph (3)(b) of that section states that no permit shall be issued to any source subject to this section unless the Department determines that the construction of the source would not interfere with the attainment and maintenance of any state or national ambient air quality standard or maximum allowable increase. Based on

the air quality modeling and ambient air monitoring results presented in the permit application, we do not have that assurance for particulate matter/PM10, sulfur dioxide, and nitrogen dioxide. Please perform cumulative modeling analyses, including all applicable sources in the area, for all averaging times for these pollutants for Class I and Class II comparison with the PSD increments and with the appropriate ambient air quality standards.

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 10, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Honorable Evelyn Rollins, Mayor
P. O. Box A
Gretna, Florida 32332-1000

Re: Gadsden County - A.P.
City of Gretna Resource Recovery Facility
AC 20-212334 (Incinerator)

Dear Ms. Rollins:

The Department has received a permit application to construct a 245 tons/day Municipal Waste Combustor (Incinerator) for the City of Gretna on May 13, 1992, and deemed it incomplete. Please provide the following information:

1. According to the letter dated May 11, 1992, from Mr. David Buff, P.E. the proposed facility will be charged with only 245 TPD of RDF and TDF. There will be no burning of solid waste taken directly from the tipping floor of the solid waste processing plant. Also, the proposed facility is a one-phase project with no future expansion plans. The proposed sources will be subject to federally enforceable restrictions that will limit the charging rate of the unit to 244.8 TPD (20,400 lbs/hr) and emissions of regulated pollutants to less than 250 TPY. Pursuant to 40 CFR 60 Subparts A and Ea, any future relaxation of the limits on charging rate (greater than 20,833 lbs/hr) will make the facility subject to 40 CFR 60 Subpart Ea. Pursuant to 40 CFR 52.21(r) and Rule 17-2.500(g), F.A.C., the future relaxation of a restriction on pollutant emissions (of 250 tons or more a year) will make this facility subject to a full PSD New Source Review (including BACT), on an "as though never constructed" basis. If there is any potential for the relaxation of restrictions, then it may be to your advantage to consider a full PSD New Source Review and compliance with the requirements of 40 CFR 60, Subpart Ea at this time. Please acknowledge these implications in writing.

2. How much MSW, including waste tires, is generated in the City of Gretna? Do you expect to receive MSW and scrap tires from other sources, who are they and how much from each source? How much is the tipping fee for each class of waste now and will it increase once this facility becomes operational? Provide copies of all firm contract(s) or a written statement from potential purchasers, acknowledging their intent to consider the purchase of energy and/or recyclables. How will the recyclables be stored? Provide details on storage of recyclables for the maximum expected volume. Also, provide us with the names of the owners and operators of this facility. The Department is concerned that the 250 TPD charging limit may be exceeded if a satisfactory answer to these questions has not been fully evaluated by the city.

3. Identify the source and quantity of medical or hazardous waste that will be received or combusted at this facility. Do you plan to burn any other type of wastes not already identified?

4. Submit a make and model number for the automatic weighing device that feeds the RDF/TDF to the combustor along with the manufacturer's guarantee that the weigh scales will always be calibrated to within + or - 2.0%. If the weigh scales exceed 2.0%, then the charging rate will exceed 250 TPD.

5. The solid waste processing plant is designed to process 500 TPD of MSW. Provide a process flow diagram along with maximum process input rates for this plant. Also, provide details of the tire de-beading and shredding operations indicating fugitive or other emissions and how they are controlled. What is the form of RDF/TDF (pellets, bales, or briquettes)?

6. Submit a process flow diagram indicating how the two separate waste streams, the 80-20 and 75-25 mixture of RDF/TDF (heat input ratio) is fed to the combustor, and how can the Department be assured that proper heat input ratios are being maintained in each waste stream at all times?

7. What is the quantity, pressure, and temperature of the steam that you propose to generate? Also, provide us with the details of the steam turbine that you propose to install.

8. Provide detailed drawings of the Auger Combustor System showing the primary and secondary chamber locations and their operating temperatures; also provide the location of the lime spray injection. Provide material balance for this flow sheet. Which lime injection system do you propose to install, the dry lime or the spray dryer?

9. How much natural gas and/or No.2 fuel oil is used in the four auxiliary burners? What is the maximum sulfur content in these fuels? Recalculate and submit emission estimates for all pollutants with auxiliary burners in operation.

10. Submit detailed drawings of the following: (a) (combustor) fabric filter (baghouse), including the specification sheet; and, (b) the baghouse stack showing sampling location (upstream/downstream distance) and gas flow rates.

11. Submit baghouse specification sheets for the lime silo and flyash storage bin. Please submit the preliminary engineering calculations that were used to determine that the proposed filtration area of the baghouses will be adequate.

12. How do you propose to control fugitive dust emissions expected from transporting and storage of ashes? Submit an updated site map. Is this site off of S.R. 12 or U.S. Highway 90?

13. Please describe the type of fans that will be used in the proposed incinerator system. Explain whether the proposed fans will be fixed speed or variable speed fans and provide copies of the manufacturer's curve for each fan for the proposed system.

14. NO_x, SO_2, and CO Emissions - Based on the permit application, the proposed maximum 1-hour emissions of NO_x and SO_2 are almost twice the estimated annual average emissions. The maximum hourly emissions of NO_x and SO_2 would be sufficient to trigger PSD New Source Review if the source was continuously operated at the maximum rate. Please provide and describe the mechanism that will be used to provide the Department with continuous reasonable assurance (i.e., continuous emission monitoring) that the emissions of NO_x, SO_2, and CO will not reach the levels that would trigger a full PSD New Source Review. Submit the make and model number of any monitors that you propose to install.

15. Submit a plot plan showing the ash transporting and storage system and the roads in the plant yards. How do you plan to control the fugitive emissions generated due to the vehicular traffic?

16. Provide emission rates for all pollutants and provide basis for the estimates. Include estimates of all toxic or potentially toxic emissions (such as dioxins, furans, etc.) in addition to pollutants identified in your application.

17. Maximum concentration values for sulfur dioxide emissions in Table 5-5 appear to be in error. Please provide a corrected Table 5-5.

18. Even though this project as proposed will not be subject to PSD review and is only subject to the provisions of F.A.C. Rule 17-2.520, paragraph (3)(b) of that section states that no permit shall be issued to any source subject to this section unless the Department determines that the construction of the source would not interfere with the attainment and maintenance of any state or national ambient air quality standard or maximum allowable increase. Based on the air quality modeling and ambient air monitoring results presented in the permit application, we do not have that assurance for particulate matter/PM_{10}, sulfur dioxide and nitrogen dioxide. Please perform cumulative modeling analysis, including all applicable sources in the area, for all averaging times for these pollutants for comparison with the Class I and Class II PSD increments and with the appropriate ambient air quality standards.

19. Except for the 8 and 24 hour no-threat levels for nickel, the values used by the City of Gretna reflect the correct no-threat levels used by the Department to review permit applications for toxic air emissions. The Department's 8 and 24 hour no-threat levels for nickel are 10 and 2.4, respectively.

20. Please provide comments to the concerns of the United States Department of the Interior Fish and Wildlife Service letter (attached).

21. Please be advised that this facility will require a separate solid waste permit. For details contact the Department's Northwest District office in Pensacola. You may want to contact other Bureaus in the Department for additional permitting requirements.

The processing of your application will continue upon receipt of the above requested information. If you have any questions, please contact Mirza P. Baig at (904) 488-1344.

Sincerely,

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

CHF/MB/plm

cc: Ed Middleswart, P.E., Northwest District
Tom Moody, P.E., Northwest District
David Buff, P.E., KBN
James Carter, Gretna City Manager
John Mathews, Fl. Reduction Corp.
O. C. Allen, Financing Officer, City of Gretna
Chairman, Gadsden County Commission
Jim Lewis, Office of the Secretary, DER
Chris Shaver, Nat'l Park Service, Colorado
Jewell Harper, EPA, Atlanta
James W. Fulliam, Jr.

DRAFT

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL
# of pages ▶ 3

To MIRZA BAIG	From JOHN CANA - FWS
Dept./Agency FL DER	Phone # (303) 969-2957
Fax # (904) 922-6979	Fax # (303) 969-2827

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

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

Dear Mr. Fancy:

This letter relays our comments on the permit application for the solid waste combustor proposed for the city of Gretna. This facility would be designed to burn a combination of municipal waste and shredded auto tires. It would be located in Gadsden County and would potentially impact St. Marks Wilderness Area, a Class I area administered by the U.S. Fish and Wildlife Service, which lies approximately 55 km south of the proposed facility. The information provided to us indicates that this facility will not discharge more than 250 tons per year (TPY) of any criteria pollutants nor will it have a fuel charge rate of more than 250 tons per day (TPD). The proposed facility would emit 249 TPY of nitrogen oxides (NO_x) and 202 TPY of sulfur dioxide (SO_2) and limit waste feed to not more than 244.95 TPD. The proposed combustor is therefore not required to submit a Prevention of Significant Deterioration (PSD) permit application. We do not expect that the proposed waste incinerator will adversely impact the air quality or air quality related values in the wilderness area. However, we do have comments regarding the best available control technology (BACT), air quality modeling, and air quality related values analyses that will assist you in analysis of the potential impacts for this facility.

BACT

We agree that the proposed dry lime injection/baghouse or spray dryer/baghouse system represents BACT to minimize emissions of particulate matter (PM), SO_2, and hydrogen chloride (HCl) from the proposed incinerator. However, we do not agree that the proposed emission rates reflect the levels that can be achieved with these systems. For example, the references listed in Table 2-4, and the emission calculations provided in Appendix A, show that the proposed emission rates are based on a PM concentration of 0.08 grains per dry standard cubic foot (gr/dscf), and SO_2 and HCl collection efficiencies of 75 and 80 percent, respectively. Although the 0.08 gr/dscf rate is equivalent to the New Source Performance Standard (NSPS) for Incinerators (Subpart E), dry scrubber/baghouse systems can reduce incinerator particulate emission to less than 0.01 gr/dscf. In addition, spray dryer/baghouse systems can reduce SO_2 and HCl emissions from resource recovery facilities by up to 90 and 98 percent, respectively. Therefore, we recommend that the facility be required to meet the more stringent emission rates.

DRAFT

AIR QUALITY ANALYSIS

The applicant modeled the facility's impact on the wilderness area using the U.S. Environmental Protection Agency (EPA) Industrial Source Complex Short Term (ISCST) model and 5 years (1982-1986) of National Weather Service meteorological data from Tallahassee, Florida. The applicant only reported the maximum concentrations at the wilderness area. Emissions input into the model were for a "worst case" combination of tires and solid waste. The results predicted that SO_2 emissions from the proposed combustor will have an annual impact of 0.04 ug/m^3, a 24-hr impact of 1.19 ug/m^3 and a 3-hr impact of 5.64 ug/m^3 at the wilderness area. Nitrogen oxide emissions from the proposed combustor will consume 0.05 ug/m^3 of the annual nitrogen dioxide increment of 100 ug/m^3 at the wilderness area. Because the proposed source is not subject to PSD permit application requirements, several analyses required of PSD applicants were not required by The City of Gretna. There was no cumulative increment analysis of all increment-consuming sources, nor a total pollutant loading analysis where newly permitted source (not yet operating) impacts are added to monitored background concentrations to develop a total pollutant loading concentration to the Class I ecosystem. No visibility, soil, or vegetation impact analyses were performed due to the facility's non-PSD status.

Because the source consumes greater than 23 percent of the Class I short term increment, we are concerned that if other increment consuming sources were modeled, that analysis may indicate a much larger portion of the increment has been consumed. Therefore, we request that the Florida Department of Environmental Regulation add this source to the PSD increment tracking inventory.

In conclusion, we recommend that the permit issued by the Florida Department of Environmental Regulation include specific conditions that require submission of a PSD permit application for any exceedance of the fuel charge rate in excess of 250 TPD. The facility should limit its hours of operation to insure that the maximum allowable emissions specified in the permit are not be exceeded. The facility should also limit fuel combusted to municipal waste and rubber tires and use these fuels only in proportions as specified in the permit. Any discharge of a regulated pollutant in excess of 250 TPY will require submission of a PSD permit application by the City of Gretna. Additionally, we ask that you require emission rates and emission collection efficiencies in a range achievable by the controls proposed for the City of Gretna incinerator. The incinerator may also be subject to the NSPS for Municipal Waste Combustors (Subpart Ea). If applicable, these requirements should be part of the City of Gretna permit as well.

Sincerely,

James W. Pulliam, Jr.
Regional Director

DRAFT

cc: Jellell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
345 Courtland Street, NE
Atlanta, Georgia 30365

bcc:
FWS-WASO: Don Voros, Chief, Resource Management
FWS-REG. 4: AQC
FWS-REG. 6: Ty Berry
SAMA: Refuge Manager
AQD-DEN: John Lara

United States Department of the Interior

FISH AND WILDLIFE SERVICE
75 Spring Street, S.W.
Atlanta, Georgia
30303

TAKE PRIDE IN AMERICA

RECEIVED
JUN 22 1992
Division of Air
Resources Management

June 16, 1992

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

Dear Mr. Fancy:

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that the proposed emission rates are based on a PM concentration of 0.08 grains per dry standard cubic foot (gr/dscf), and SO_2 and HCl collection efficiencies of 75 and 80 percent, respectively. Although the 0.08 gr/dscf rate is equivalent to the New Source Performance Standard (NSPS) for Incinerators (Subpart E), dry scrubber/baghouse systems can reduce incinerator particulate emission to less than 0.01 gr/dscf. In addition, spray dryer/baghouse systems can reduce SO_2 and HCl emissions from resource recovery facilities by up to 90 and 98 percent, respectively. Therefore, we recommend that the facility be required to meet the more stringent emission rates.

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In conclusion, we recommend that the permit issued by the Florida Department of Environmental Regulation include specific conditions that require submission of a PSD permit application for any exceedance of the fuel charge rate in excess of 250 TPD. The facility should limit its hours of operation to insure that the maximum allowable emissions specified in the permit are not being exceeded. The facility should also limit fuel combusted to

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Sincerely yours,

John R. Eadie

for James W. Pulliam, Jr.
Regional Director

cc:
Ms. Jewell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
345 Courtland Street, NE
Atlanta, Georgia 30365

cc: M. Baig
C. Holladay
E. Middlesworth, NW Dist.
D. Buff, KBN
CHFPDL

United States Department of the Interior

FISH AND WILDLIFE SERVICE
75 Spring Street, S.W.
Atlanta, Georgia
30303

TAKE PRIDE IN AMERICA

RECEIVED
JUN 22 1992
Division of Air
Resources Management

June 16, 1992

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

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should limit them to 245.0

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that the proposed emission rates are based on a PM concentration of 0.08 grains per dry standard cubic foot (gr/dscf), and SO_2 and HCl collection efficiencies of 75 and 80 percent, respectively. Although the 0.08 gr/dscf rate is equivalent to the New Source Performance Standard (NSPS) for Incinerators (Subpart E), dry scrubber/baghouse systems can reduce incinerator particulate emission to less than 0.01 gr/dscf. In addition, spray dryer/baghouse systems can reduce SO_2 and HCl emissions from resource recovery facilities by up to 90 and 98 percent, respectively. Therefore, we recommend that the facility be required to meet the more stringent emission rates.

agree

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we should do this

In conclusion, we recommend that the permit issued by the Florida Department of Environmental Regulation include specific conditions that require submission of a PSD permit application for any exceedance of the fuel charge rate in excess of 250 TPD. The facility should limit its hours of operation to insure that the maximum allowable emissions specified in the permit are not being exceeded. The facility should also limit fuel combusted to

agree

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They need to be informed of this & may want a permit condition to that effect

Sincerely yours,

John R. Eadie

for James W. Pulliam, Jr.
Regional Director

cc:
Ms. Jewell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
345 Courtland Street, NE
Atlanta, Georgia 30365

cc M. Bair
C Holladay
[illegible] Middlewurth, NW Dist.
J. Ruff, RBW

~~CHF~~ / PL

FYI

A few comments on this one. Clare

Gadsden

CITY OF GRETNA

U.S. Highway 90
Post Office Drawer A
Gretna, Florida 32332
Telephone (904) 856-5257
Fax No. (904) 856-5293

June 26,1992

Florida Department Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Proof of Advertisement of DER Application for Solid Waste Combustor

Dear Mr. Fancy:

Enclosed you will find a copy of the ad that was published in the June 25th, Edition of the Gadsden County Times.

If I can be of further assistance please feel free to call me at the above number.

Sincerely,

Charles Hayes
Assistant Manager

RECEIVED
JUN 30 1992
EA, SOLID WASTE

Department of Environmental Regulation

Routing and Transmittal Slip

To: (Name, Office, Location)

1. Mirza Baig / Patty A.
2.
3.
4.

Remarks:

This got buried in our files.

Sorry!

RECEIVED
JAN 25 1993
Division of Air Resources Management

From: NT Yan

Date 1/22/93

Phone

GADSDEN COUNTY TIMES, INC.
POST OFFICE BOX 790
15 SOUTH MADISON STREET
QUINCY FL 32353-0790

I N V O I C E

BILL TO:
CITY OF GRETNA
P O DRAWER A
GRETNA FL 32332

SHIP TO:
CITY OF GRETNA
P O DRAWER A
GRETNA FL 32332

INVOICE#	DATE	ORDER#	DATE	CUST.#	CUSTOMER P.O. #	TERMS	SALESMAN
4647	6/25/92	4215	6/25/92	1035		DUE ON RECEIPT	TIM

QUANTITY	U/M	ITEM/DESCRIPTION	DISC	UNIT PRICE	AMOUNT
4	EA	145 LOC 01 TIMES LEGAL - FIRST RUN NOTICE OF RECEIPT OF APPLICATION		3.000	12.00
		Subtotal			12.00
		Total Due			12.00

GADSDEN COUNTY TIMES

PUBLISHED WEEKLY

QUINCY, GADSDEN COUNTY, FLORIDA

State of Florida

County of Gadsden:

Before the undersigned personally appeared Timothy O. Matthew who on oath says that he is Publisher of the Gadsden County Times, a weekly newspaper published at Quincy, in Gadsden County, Florida; that the attached copy of advertisement, being a Legal in the matter of

Notice of Receipt of Application - State of Florida Department of Environmental Regulation - Notice of Application - City of Gretna

in the ..... Court, was published in said newspaper in the

issues of June 25, 1992

Affiant further says that the said Gadsden County Times is a newspaper published at Quincy, in said Gadsden County, Florida, and that the said newspaper has heretofore been continuously published in said Gadsden County, Florida, each week and has been entered as second class mail matter at the post office in Quincy, in said Gadsden County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that 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.

Timothy O. Matthew

Sworn to and subscribed before me this 25th

day of June, A. D. 19 92

Mary Kaye Cooksey

(SEAL) NOTARY PUBLIC

MARY KAYE COOKSEY
MY COMMISSION EXPIRES
June 23, 1995
BONDED THRU TROY FAIN INSURANCE, INC.

NOTICE OF RECEIPT OF APPLICATION

State of Florida
Department of Environmental Regulation
Notice of Application

The Department announces receipt of an application for permit from the City of Gretna, to construct a Resource Recovery Facility (incineration) to combust 245 tons/day of municipal solid waste and scrap tires. This proposed project will be located at the City of Gretna Industrial Park on S.R. 12, Gretna, Gadsden County Florida.

This application is being processed and 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 the Bureau of Air Regulation office, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and at the Northwest District office, 160 Governmental Center, Pensacola, Florida 32501-5794. Any comments or objections should be filed in writing with the Department at either address. Comments or objections should be submitted as soon as possible to insure that there is adequate time for them to be considered in the Department's decision on the application.

06-25-92 1t

DATE: July 8, 1992

TO: Clair Fancy

FROM: Preston Lewis

SUBJ: City of Gretna - Democrat contact

Julia Hauserman, Democrat contacted Patty Adams and myself yesterday to review the file on the City of Gretna resource recovery facility application and incompleteness letter. She stated that their interest was prompted by Sen. Pat Thomas concerns. She said he came into the office "raving about it going in". I took it he was concerned or opposed it. Neither Patty or I made statments about the merits or concerns about the facility.

cc Patty Adams
Mirza Baig
Jim Pennington

MEDIA HOT SHEET

Date: 7-8-92

Reporter: JULIE HAUSERMAN

At (Newspaper, T.V., Radio, etc.): TALLAHASSEE DEMOCRAT

From: MIRZA BAIG
Division: AIR
Bureau/Sect.: BAR
Phone: 488-1344

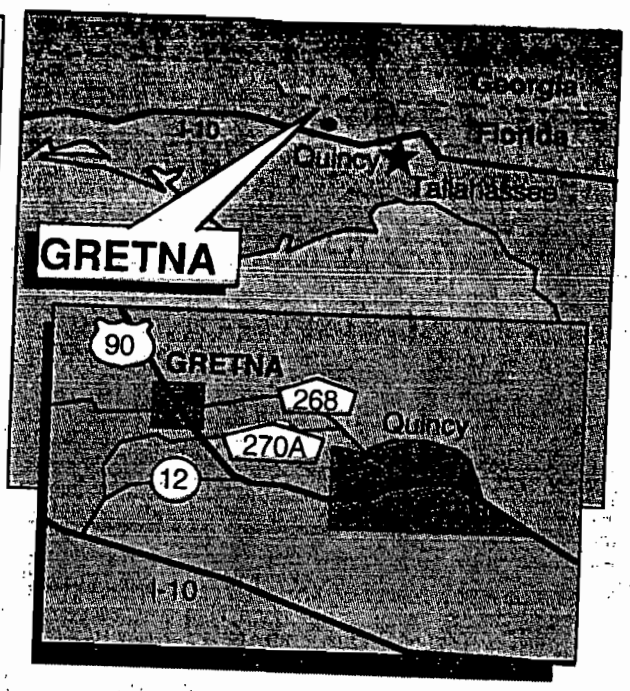
Topic of Call: CITY OF GRETNA RESOURCE RECOVERY FACILITY (PENDING AIR PERMIT APPLICATION)

Questions asked:
1. Is the application complete?
2. What kind of wastes will be combusted?
3. Where is the waste coming from?
4. Why are we processing this application in Tallahassee and not in the District?
5. Is this a major size combustor?
6. What type of pollutants would be emitted?
7. If a permit is issued will this be a safe operation? ETC., ETC.
8. Do they have proper pollution control devices?

Deadline:

Summary of Conversation (use remainder of sheet, and back, if necessary):

DER Employee Interviewed Mirza Baig.



Haze hangs over Gretna burner plan

State officials say the city's application to build a garbage-burning, electricity-generating incinerator is incomplete.

By Julie Hauserman
Democrat staff writer

The city of Gretna wants to build a multimillion-dollar garbage incinerator that's big enough to burn as much as 245 tons a day, producing electricity.

Gretna would collect 500 tons of garbage and old tires every day. It would burn half, then haul off or recycle the rest, according to an application filed with the state Department of Environmental Regulation.

Since Gretna does not produce enough garbage to feed the proposed plant, it's clear that the garbage will be coming from somewhere else.

But Gretna officials won't say exactly where they plan to get the garbage, just where they intend to sell the electricity, or how, specifically, the tiny town intends to pay for the project.

A Dunellon company called Florida Reduction Corp. plans to build the incinerator for Gretna. The company's president, John Matthews, says the garbage would come "from the local area and from the state of Florida."

Matthews said Gretna would eventually own the plant, and would make money selling electricity. He said the project would create between 75 and 110 jobs.

"Believe me, this is a very clean and economical way to dispose of solid waste," he said.

Please see GRETNA, 2C

GRETNA/

Panama City also has a garbage burner

Controversy reigns

Some say it makes sense to burn garbage and keep it out of the landfill, where it can taint groundwater. Others say the incinerators release harmful pollutants like dioxin and mercury.

The Gretna plan, which has been quietly kicking around since April, is already generating controversy.

"I don't want my home county to be the host for all this garbage," said state Sen. Pat Thomas, D-Quincy, who learned about the plan this week.

Thomas lives just two miles from the Gretna Industrial Park on State Road 12, where the plant would sit.

Two years ago, citizen outcry derailed a plan to put a medical-waste burner in the Gadsden County town of Midway.

The Gretna plant would be the second garbage burner in North Florida. Now, the only garbage plant in this part of the state is near Panama City.

Gretna's DER application was prepared by KBN Engineering and Applied Sciences Inc. of Gainesville, but it is unclear who paid for the engineering. Gretna City Manager James Carter said no city money has been spent on the incinerator plan yet.

The applicant is listed as Gretna Mayor Evelyn Rollins. But she said she is unfamiliar with the project's details, and city officials referred all questions to Florida Reduction Corp.

DER has questions

The plant, which would have a 70-foot-high stack, would generate 7.5 megawatts, enough to power 7,000 to 8,000 homes.

DER officials say Gretna's application is incomplete, and the agency has asked for more details.

"We would like to know where the garbage is coming from," said Mirza Baig, a DER air-permitting engineer. "We want to know the whole picture. Among other things, we want to make sure we are not going to have medical waste or hazardous waste coming in."

Matthews said the only hazardous waste at the plant will be household hazardous waste — paint cans, aerosols, and the like. Those items, he said, would be removed before the garbage is burned. Mercury-containing batteries, iron, and most of the plastic would be sorted out, too.

The plant would burn household garbage and shredded tires to make electricity, he said. It would have a scrubber and a "bag house" that would catch and reduce pollution.

Still, according to the application, the Gretna plant would emit about 249 tons of nitrogen oxide each year, 202 tons of sulphur dioxide, and 227 tons of carbon monoxide yearly.

The incinerator ash would be encased in plastic, and used in "outdoor products," Matthews said.

The DER also has concerns about the plant's capacity. At 245 tons per day, the plant falls just under an important regulatory cutoff — 250 tons per day. If it burned just a few more tons, the plant would have to meet more stringent pollution requirements.

Gretna has more regulatory hoops to go through in the next several months before it can move its plan forward. And before the DER issues a construction permit, citizens will have the option of holding a public hearing.

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 13, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Honorable Evelyn Rollins, Mayor
City of Gretna
P. O. Box A
Gretna, FL 32332-1000

RE: Gadsden County - A.P.
City of Gretna Resource Recovery Facility
AC 20-212334

Dear Ms. Rollins:

According to EPA's letter dated July 8, 1992 (copy attached), it has been determined that the above referenced project will be subject to PSD permitting requirements. Consequently, please submit an additional fee of $2,500 to the Department. You should also submit all the necessary PSD information that was not included in the permit application submitted previously on May 13, 1992.

The processing of your application will continue upon receipt of the additional fee and the PSD information. If you have any questions, please contact Mr. Mirza Baig at (904)488-1344.

Sincerely,

James K. Pennington for

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

CHF/MB/pa

cc: Ed Middleswart, NW District
David Buff, P.E., KBN
James Carter, Gretna City Manager
Chairman, Gadsden County Commission
Sen. Pat Thomas
John Mathews, Florida Reduction Group
Jewell Harper, EPA
Chris Shaver, NPS
James W. Pulliam, Jr., FWS

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee
To: Rodney Location:
To: Location:
To: Location:
From: Date:

Interoffice Memorandum

TO: Rodney DeHan

THROUGH: James McNeal

FROM: Paul Lee

DATE: July 15, 1992

SUBJECT: Potential Impact on Ground Water Resource by the Gretna City Municipal Solid Waste and Waste Tire Resource Recovery Incinerator

The City of Gretna has filed a permit application for a resource recovery incinerator. The facility will use municipal solid waste (75-80% of total) and waste tires (20-25% of total) as fuel sources.

The proposed facility (less than 250 Tons Per Year emission of any regulated pollutant and less than 250 Tons Per Day of solid waste burned) will be classified as a "minor" source under federal and State of Florida air pollution control regulations. As such, the facility will not be subject to the prevention of significant deterioration (PSD) provisions of the regulations. However, it will be subject to the federal New Source Performance Standards (NSPS) and state of Florida emission standards that limit emissions of particulate matter (PM) from the combustor.

Before entering the combustion chamber, recyclable materials and some non-combustible debris will be sorted out from the solid waste; and rubber and fiber in the tires will be separated from metal beads, then shredded.

The combustion heat will be used for producing steam to power a 7.5 MW generator. The facility will reduce 148,000 tons per year of municipal solid waste that currently being landfilled.

The facility will incorporate state-of-art air pollution equipment for controlling air emmisions, which includes a unique combustion sytem (three-stage controlled burning and after burner), a baghouse and an acid gas abatement process of device (dry lime injection or spray dryer) to control emissions of particulate matter and acid gases.

The Department's concerns on potential impacts of the facility on ground water include:

1. Water supply for make-up water to the boiler, for the cooling tower, for on-site sanitary system and for

Department of Environmental Regulation

Routing and Transmittal Slip

MIRZA

To: (Name, Office, Location) ~~[illegible]~~ Apk 7/21/92

1. Tom Rogers

2.

3. (Air)

4.

Remarks:

These are our comments on the groundwater impacts of the Solid Waste Combustor in Gretna, per our phone contact. I am also sending a copy to Robert Beining (Domestic Waste Engineer in Pensacola DER District. He promised to coordinate with the district's industrial waste people. I have called Miss Johnson but she does not return her calls.

From: Rodney S. DeHan

Date: 7-20-92

Phone: 8-3601

maintenance are not addressed. The water supply source could be ground water. The source aquifer, the supply well(s), the pumpage and its impact on the regional source aquifer should be presented in detail.

2. Waste water (including storm water) drainage, treatment, recycling, retention and discharge in the facility are not addressed in the permit application. These discharge systems may have adverse effects on ground water and surface water.

3. Particulate matter and acid fall-out and their possible impacts to the rain water, surface water and ground water are also not addressed.

Based on the hydrogeological maps collected in a DER June 1991 publication 'Florida's Ground Water Quality Monitoring Program, Hydrogeological Framework', the area where the facility is to be located has a very low potential for recharge to the Floridan Aquifer (Page 83, Fig. 72). There is a thick (~200-250 feet) intermediate aquifer/confining layer in this area. The surficial aquifer thickness in this area usually is less than 50 feet. Further, the Floridan aquifer has a high piezometric potential, therefore ground water flow is from the Floridan Aquifer toward the overlying intermediate aquifer. From these data, the possible impact of any residual fallout from the air emission from the facility would be limited to the surface water and the surficial aquifer.

The potential impacts to the ground water by the facility water supply system and waste water discharge systems can not be evaluated at this stage, pending further information provided by the applicant.

I have a general reservation on solid waste incineration. Mercury is different from other heavy metals in that it is very volatile, therefore difficult to be scrubbed from the air emission. The attached table indicates that 97.22% of the mercury carried by fuel into the incinerator will be emitted to the atmosphere. In other words, the effectiveness of air emission reduction system for mercury is less than 3%. For other heavy metals, the effectiveness of the air emission reduction system reaches around 95%. Major contributors of Mercury to the solid waste stream are the dry batteries used in flash lights, toys and portable appliances. Batteries should be excluded from the solid waste based on environmental protection.

PZL/lq

Attachments (listed on page three)

Attachments: 5 maps copied from 'Florida's Ground water Quality Monitoring Program, Hydrogeological Framework' DER Publication, June 1991.

A table comparing input amounts of pollutants to the incinerator with fuel, and the output amounts of these pollutants in the air emission.

AIR EMISSION OF DIFFERENT COMPOUNDS
AS COMPARED WITH THEIR AMOUNTS IN THE FUEL

COMPOUND NAME	LB/HR INPUT FROM FUEL	LB/HR OUTPUT IN AIR EMISSION	PERCENTAGE EMISSION/FUEL
LEAD	4.153	0.164	3.95%
ARSENIC	0.08	0.0031	3.88%
CADMIUM	0.148	0.0073	4.93%
CHROMIUM	0.138	0.0013	0.94%
IRON	6.677	0.33	4.94%
NICKEL	0.057	0.0028	4.91%
DIOXINS/FURANS	0.00026	0.000082	31.54%
ZINC	31.62	1.55	4.90%
MERCURY	0.0036	0.0035	97.22%

Fuel Sources for the incinerator are: 80-90% Municipal Solid Waste and 10-20 % waste tires.

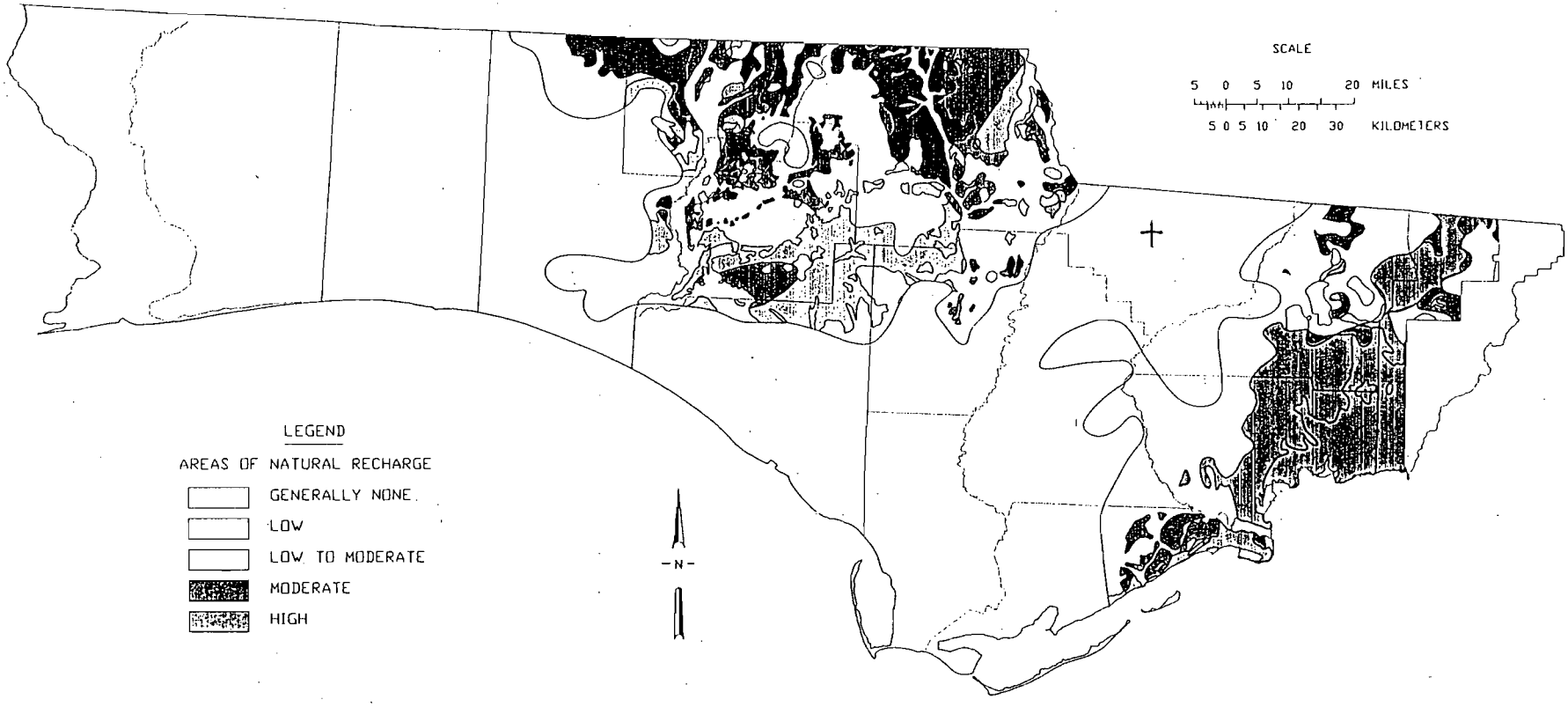


Figure 72. Floridan aquifer system recharge potential, NWFWMD

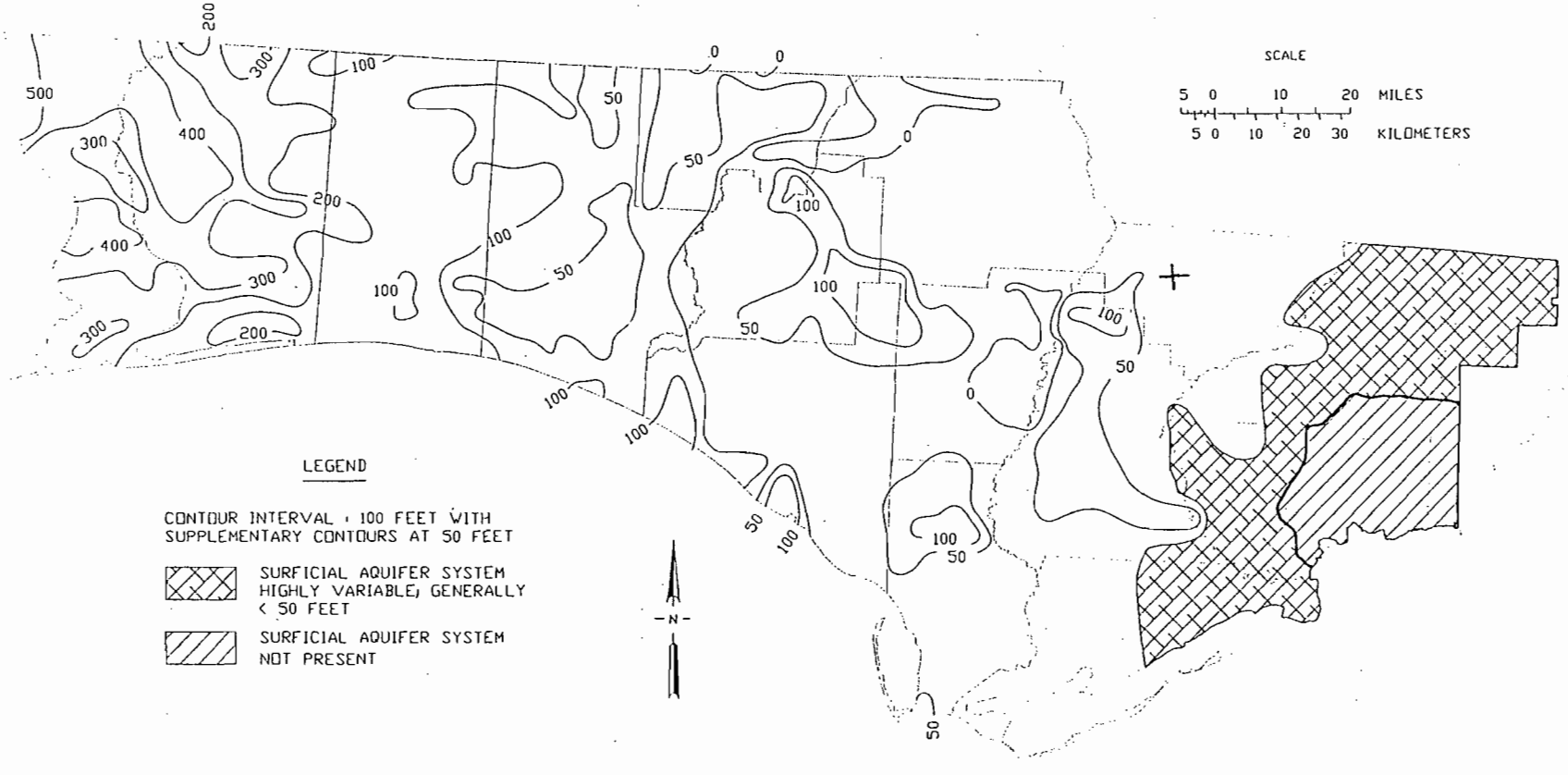


Figure 37. Surficial aquifer system thickness, NWFWMD. This does not represent one continuous aquifer over the extent of the district.

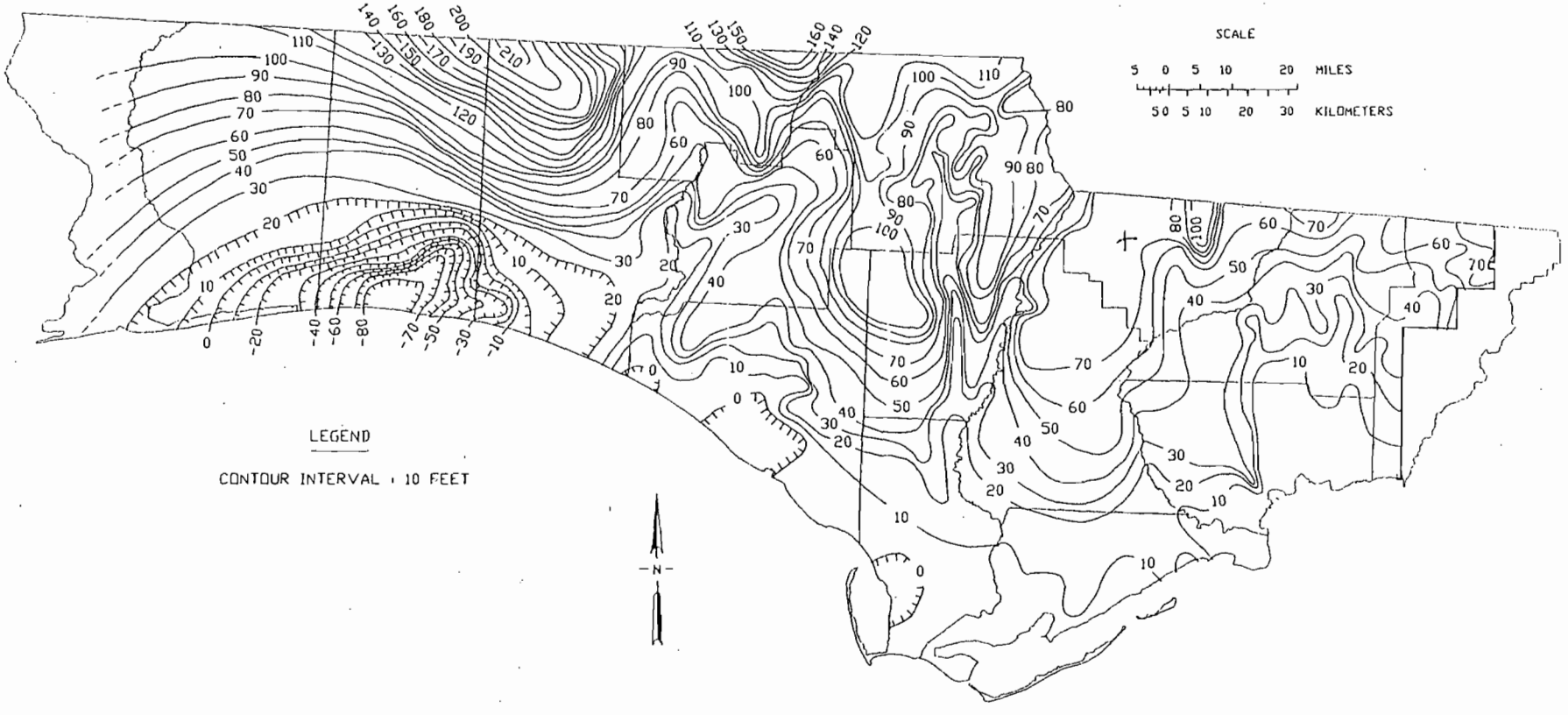


Figure 32. Floridan aquifer system potentiometric surface, NWFWMD (modified from Wagner, 1989)

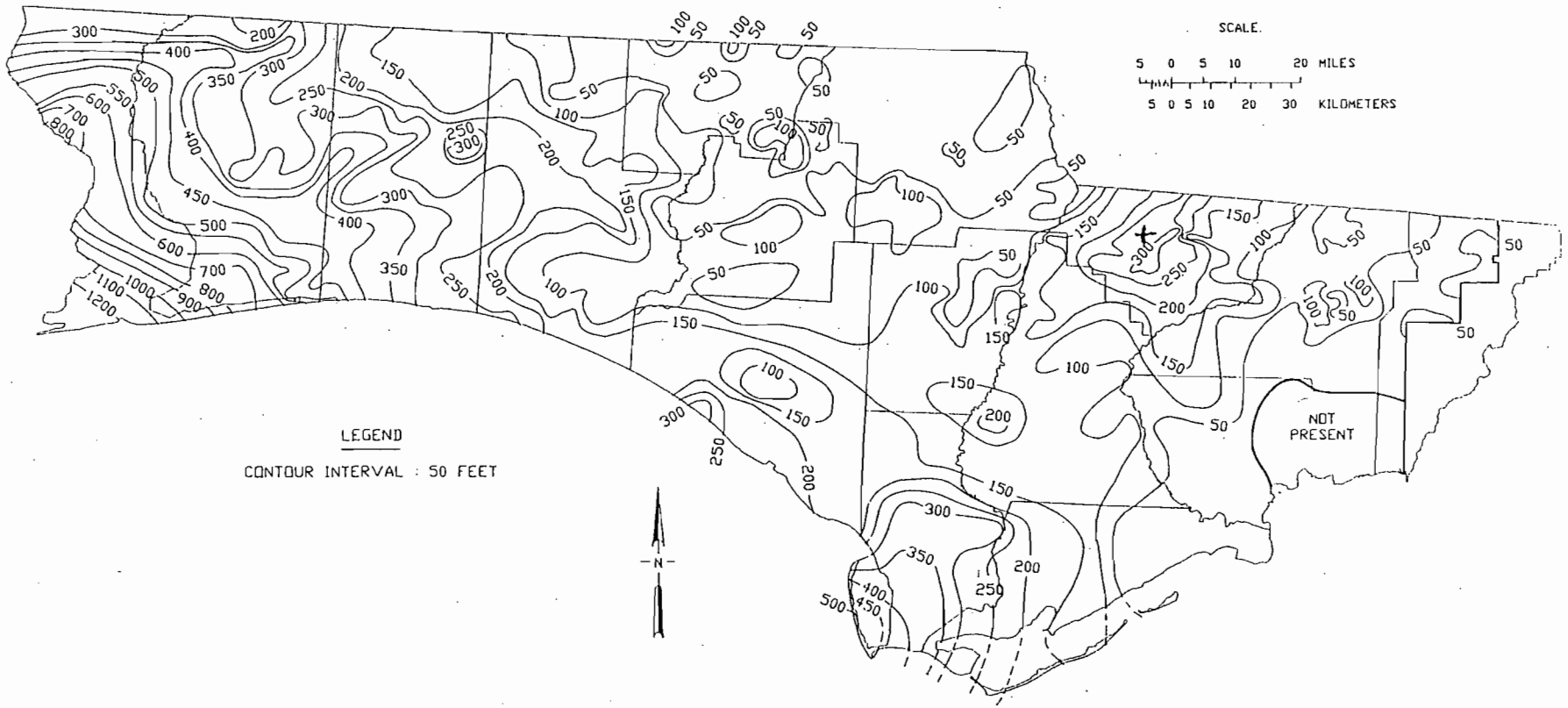


Figure 42. Isopach of the intermediate aquifer system/confining unit, NWFWMD

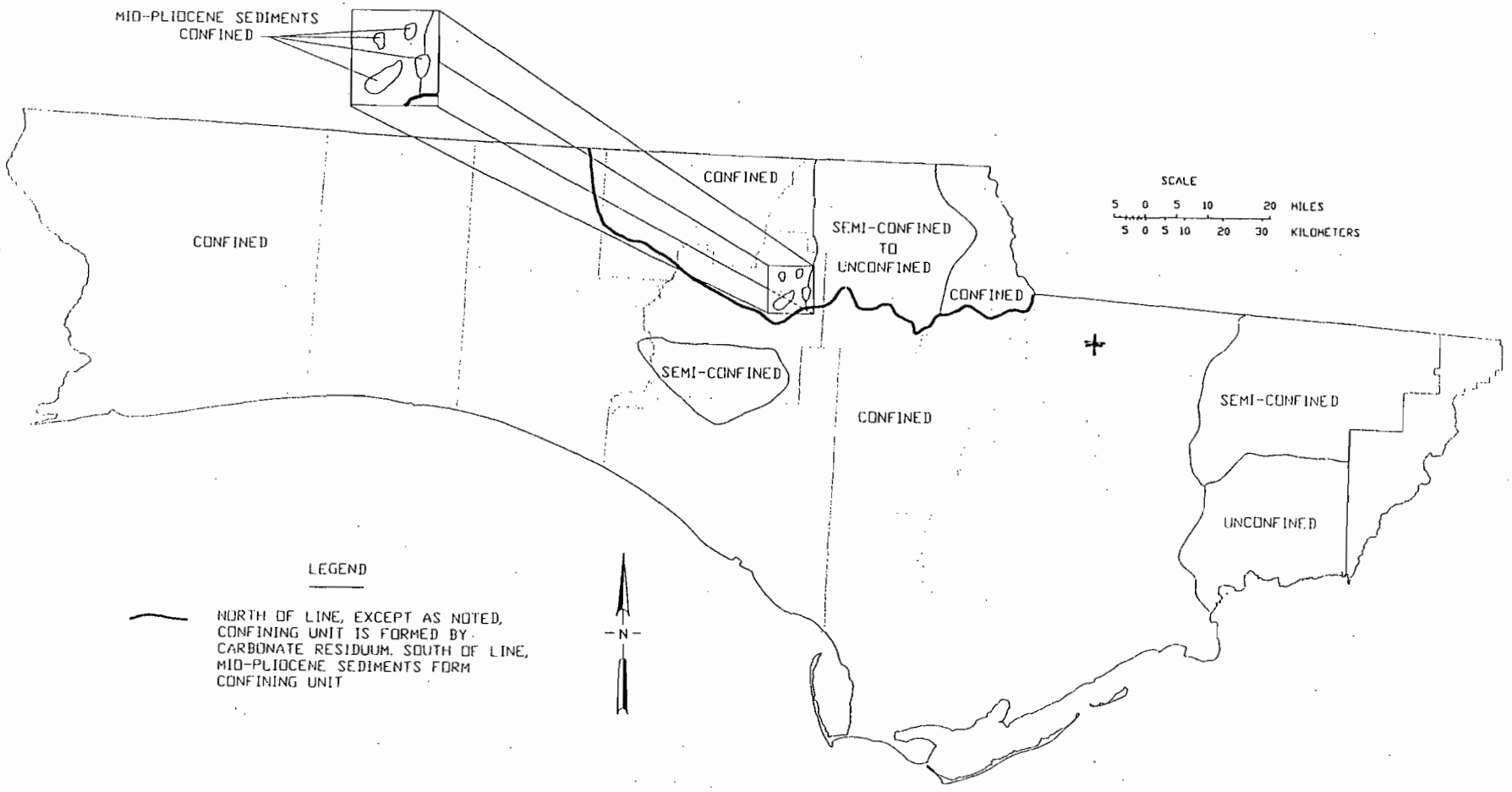


Figure 66. Confinement of the Floridan aquifer system, NWFWMD

Florida Department of Environmental Regulation
Northwest District • 160 Governmental Center • Pensacola, Florida 32501-5794
Lawton Chiles, Governor
Carol M. Browner, Secretary

JUL 2 4 1992

CERTIFIED, RETURN
RECEIPT REQUESTED

Mr. James Carter, Town Manager
Town of Gretna
Post Office Drawer A
Gretna, Florida 32332

Dear Mr. Carter:

The N.W. District has been notified that the Bureau of Air Regulation in Tallahassee is currently processing an application (No. AC20-212334) for a Solid Waste and Waste Tire Resource Recovery Incinerator for the Town of Gretna.

This letter is to notify you, the permittee, that the proposed facility will likely require additional permitting for Domestic Waste, Potable Water and Stormwater. Depending upon the site selected, Water Management (Dredge and Fill) permitting may or may not be required.

Your selected consulting engineer should be taking such concurrent action as is required to obtain the additional permits. Currently, the N.W. District does not have any applications on file relating to your proposed incinerator project. Action should be taken by the Town at this time to obtain these other permits if delays in construction are to be avoided.

If you have any questions, or I can be of further assistance, please call me at (904) 436-8380.

Sincerely,

Robert R. Reining, Jr., P.E.
Domestic Wastewater Section
Supervisor

RRR/rrr
cc: TBO
Rodeny DeHan WFA-BDW&GWR, Twin Towers
Preston Lewis, P.E. ARM-BAR, Twin Towers
David Buff, P.E. - KBN Engineering & Applied Sciences, Inc.
Mark Sowell, P.E. - NWD
John Kintz, P.E. - NWD

Patty, please distribute and file TT

Department of Environmental Regulation

Routing and Transmittal Slip

Charles Pretlow

To: (Name, Office, Location)

1. Preston Lewis, P.E.
2. Permit Section - Room 306B
3.
4.

Remarks:

RECEIVED

JUL 27 1992

Division of Air
Resources Management

From: STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
160 GOVERNMENTAL CENTER
2nd FLOOR
PENSACOLA, FLORIDA 32501

Date JUL 24 1992

Phone

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 31, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John H. Juzwiak
Vice President of Operations & Technology
Conversion Systems, Inc.
200 Welsh Road
Horsham, PA 19044

Dear Mr. Juzwiak:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for the plant that will process nonhazardous stabilized FGD by-product at the Orlando Utility Commission's Stanton Energy Center. This facility is located at 5100 South Alafaya Trail near Orlando, Orange County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Preston Lewis of the Bureau of Air Regulation.

Sincerely,

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

CHF/WH/plm

Attachments

cc: Greg DeMuth, OUC
Charles Collins, CD
Buck Oven, PPC

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DER File No. AC 48-216925
Orange County

Mr. John H. Juzwiak
Conversion Systems, Inc.
200 Welsh Road
Horsham, PA 19044

_____/

INTENT TO ISSUE

The Department of Environmental Regulation gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Conversion Systems, Inc., applied on July 24, 1992, to the Department of Environmental Regulation for a permit to construct a nonhazardous stabilized FGD by-product processing plant at Orlando Utilities Commission's Curtis H. Stanton Energy Center that is located at 5100 South Alafaya Trail, Orlando, Orange County, Florida.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that a construction permit is required for the proposed work.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of 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 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 intent. 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 receipt of this intent 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 a 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed by certified mail before the close of business on 8-7-92 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk 8-7-92
Date

Copies furnished to:

Greg DeMuth, OUC
Charles Collins, CD
Buck Oven, PPC

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To	Location
To	Location
To	Location
From	Date

Interoffice Memorandum

To: File

Thru: G. Preston Lewis

From: Mirza Baig MB

Date: Aug 26, 1992

Subj: Conversation Record with the Governor's Office
City of Gretna RRF AC 20-212334

While reviewing KBN's response (letter dated Aug 5, 1992) to our incompleteness item letter (dated June 10, 1992) for the above referenced project, today, I contacted the Office of the Governor to verify a statement contained in the above mentioned response that "Mr. Robert McKnight of the Executive Office of the Governor has offered assistance in providing additional quantities of MSW for this project".

Mr. McKnight stated to me that this was a misrepresentation of facts, in that The Governor's Office has no quantities of MSW to offer to any organization. Further, Mr. McKnight indicated that the only assistance he provided this project was to brief them on the Governor's recycling initiative and introduce them to local government recycling coordinators, as he would do any citizen. In fact Mr. McKnight further stated that "he would not object if DER denied the permit just on the fact that KBN/City of Gretna made these distorted statements". He also asked me to make a record of this conversation.

cc: Mr. Robert McKnight, The Governor's Office

Patty

United McGill Corporation 1779 Refugee Road, P.O. Box 820, Columbus, Ohio 43216-0820, 614/443-0192, Fax: 614/445-8759

August 28, 1992

Air Permitting Section
Rm. 310C
D.E.R. State of Florida
2600 Blair Stone Rd.
Tallahassee, FL 32399

Sent copy of ITD 9-22-92 PA

Attention: Mirza P. Baig, Air Permit Engineer

Subject: Air Pollution Control Equipment for the Gretna, FL Project

Dear Mr. Baig:

In response to your request, we have enclosed our Fabric Filter installation list and brochure for your information. In addition, we have summarized some of our recent installations:

1. Northern States Power; Wilmarth Generating Plant; Mankato, Minnesota

This plant consists of two RDF fired boilers which were converted from coal firing to RDF firing. Each boiler generates approximately 13 MW. Design flue gas volume was 104,000 ACFM at 450°F. Each boiler burns 10-13 TPH of RDF.

UMC supplied a turnkey APC system consisting of two spray-dryer absorber/fabric filter systems. A pebble lime storage, prep. and feed system was also provided.

The systems started up in October and December of 1990 and both have passed performance test requirements of:

a. PM - .01 gr/dscf.
b. HCl - 90% reduction or 30 ppm - whichever is less stringent.
c. SO_2 - 70% reduction or 40 ppm - whichever is less stringent.

The fabric filters have 16.5 ft. long woven fiberglass bags with a 10% Teflon B coating. Design A/C ratios are 3.35:1 gross A/C and 4.02:1 Net A/C.

2. New Hanover County; Waste-To-Energy Plant; Wilmington, North Carolina

This facility recently increased its waste incineration capacity by adding a new 249 TPD mass-burn incinerator. Design flue gas volume was 96,852 ACFM at 525°F.

UMC supplied a turnkey APC system consisting of a spray dry scrubber fabric filter system with hydrated lime storage, prep., and feed included. We also added spray-dryers and an additional electrical field to the two existing EP systems for their 100 TPD units.

The four compartment fabric filter 19 ft. long, woven fiberglass bags, with a 10% Teflon B coating. Air-to-cloth ratios are 2.65:1 gross and 3.54:1 net.

This unit start up was June 1991 and has since met or exceeded the following performance requirements:

a. PM - 0.01 gr/dscf.
b. HCl - 90% reduction or 50 ppm - whichever is less stringent
c. SO_2 - 70% reduction or 50 ppm - whichever is less stringent.

3. WMI Medical Services of Florida, Inc; Clarcona, Florida

This is a commercial medical waste incineration facility that incinerates approximately 1900 pph of waste. No heat recovery is used.

United McGill supplied everything downstream from incinerator abort stack including:

a. Refractory lined breeching, etc.
b. Evaporative cooler.
c. Two stage dry lime injection system.
d. PM drop out chamber.
e. Fabric filter.
f. I.D. fan and damper.
g. Freestanding steel stack with access, test ports, etc.
h. Complete erection and start-up services.

This system has been operating since June of 1991 and has exceeded the following performance requirements.

a. PM - .015 gr/dscf
b. HCl - 90% reduction or 4 pph, whichever is less stringent.

Because of your close proximity to the WMI installation perhaps you would like to set up a visit. The contact at this site is Sandy Beach and you can reach him at (407) 889-2800. If you have any further questions or need more information, please feel free to call.

Sincerely,

UNITED McGILL CORPORATION

Dan Grieshop

Daniel J. Grieshop
Sales Engineer
Air Pollution Control Group

DJG/mjg/2270C

cc: E. Brabham/FF Correspondence
J. Childress
J. Holloway/Engineered Systems & Equipment

UNITED McGILL CORPORATION
Fabric Filter Installations
Boiler and Waste Incinerator Applications **

In Operation -	In Engineering or Construction - -	Total - -
93 Boilers 11 Incinerators	3 Incinerators	107 Boilers & Incinerators

REPEAT CUSTOMERS

E.I. duPont - 5 Orders, 8 Blrs., 2 Incin.
Catepillar - 2 Orders, 4 Boilers
General Motors - 9 Orders, 12 Blrs., 2 Incin.
Central Soya - 3 Orders, 3 Boilers
Babcock and Wilcox - 3 Orders, 5 Boilers
Keeler Boiler - 3 Orders, 3 Boilers

Ford Motor Company - 2 Orders, 5 Boilers
Fort Howard Paper - 2 Orders, 7 Boilers
Scott Paper Company - 2 Orders, 6 Boilers
Georgia Pacific - 2 Orders, 4 Boilers
Lurgi Corporation - 2 Orders, 3 Boilers
Basic Env. Engr. - 2 Orders, 2 Incin.

Unit No.	Customer	Location	Fuel	Firing	Equipment	Gas Volume	Start up
1	E. I. duPont	Parkersburg, WV	2.5% S, Coal	Sprd. - Stoker	36 A/M I, 5 Compt.	25,200	12/74
2	E. I. duPont	Parkersburg, WV	2.5% S, Coal	Sprd. - Stoker	(2)-42 A/M I, 3 Compt.	5,000	12/74
3	E. I. duPont	Parkersburg, WV	2.5% S, Coal	Sprd. - Stoker	(2)-30 A/M I, 3 Compt.	46,200	12/74
4	E. I. duPont	Parkersburg, WV	2.5% S, Coal	Sprd. - Stoker	(2)-54 A/M I, 3 Compt.	86,000	12/74
5	Lubrizol, Inc.	Painsville, OH	Oil Refuse	Incinerator	39 A/M I	35,000	12/74
6	E. I. duPont	New Johnsonville, TN	Coal	Sprd. - Stoker	(2) -42 A.M I, 3Cpt(19)	65,000	12/75

Unit No.	Customer	Location	Fuel	Firing	Equipment	Gas Volume	Start up
7	E. I. duPont	New Johnsonville, TN	Coal	Sprd. - Stoker	(2) -42 A/M I, 3Cpt(19)	65,000	12/75
8	Caterpillar	Decatur, IL	2% S, Coal	Sprd. - Stoker	9-B/M 196	150,000	11/76
9	Caterpillar	Decatur, IL	2% S, Coal	Sprd. - Stoker	Combined with 8	Incl. In #8	11/76
10	Caterpillar	Decatur, IL	2% S, Coal	Sprd. - Stoker	Combined with 8	Incl. In #8	11/76
11	Simpson Timber	Shelton, WA	Salt/Hog	Dutch Oven	6-B/M 196	100,000	02/76
12	Simpson Timber	Shelton, WA	Salt/Hog	Dutch Oven	8-B/M 196	130,000	03/76
13	Simpson Timber	Shelton, WA	Salt/Hog	Dutch Oven	Combined with 12	Incl. In #12	03/76
14	Simpson Timber	Shelton, WA	Salt/Hog	Dutch Oven	Combined with 12	Incl. In #12	03/76
15	Simpson Timber	Shelton, WA	Salt/Hog	Dutch Oven	Combined with 12	Incl. In #12	03/76
16	Ashland Chem. (1)	Mapleton, IL	3.9% S, Coal	Sprd. - Stoker	4-B/M 196-14	70,000	05/76
17	Ashland Chem. (1)	Mapleton, IL	3.9% S, Coal	Sprd. - Stoker	Combined with 16	Incl. In #16	05/76
18	Uniroyal Chemical	Painseville, OH	3% S, Coal	Pulverized	4-B/M 196-14	32,000	09/77
19	Kingsley AFB	Klamath Falls, OR	.8% S, Coal	Sprd. - Stoker	2-B/M 196-14	24,000	12/76
20	Kingsley AFB	Klamath Falls, OR	.8% S, Coal	Sprd. - Stoker	Combined with 19	Incl. In #19	12/76
21	Kingsley AFB	Klamath Falls, OR	.8% S, Coal	Sprd. - Stoker	Combined with 19	Incl. In #19	12/76
22	Delco-Remy (G.M.)	Anderson, IN	Coal	Sprd. - Stoker	2-B/M 196-14	24,000	02/77
23	Firestone Tire (2)	Pottstown, PA	Coal	Pulverised	(3) 13/12 D/M I	29,000	07/78
24	Georgia-Pacific	Bellingham, WA	Salt/Hog	Dutch Oven	11-B/M 210-14	180,000	01/79
25	Georgia-Pacific	Bellingham, WA	Salt/Hog	Dutch Oven	Combined with 24	Incl. In #24	01/79

Unit No.	Customer	Location	Fuel	Firing	Equipment	Gas Volume	Start up
26	Georgia-Pacific	Bellingham, WA	Salt/Hog	Dutch Oven	Combined with 24	Incl. In #24	01/79
27*	Caterpillar (3)	Decatur, IL	2% S, Coal	Sprd. - Stoker	4-B/M 210-14	59,000	02/81
28*	General Motors (3)	Three Rivers, MI	Coal	Sprd. - Stoker	3-B/M 156-14	30,500	01/81
29	Nana Construction	Prudhoe Bay, AK	Solid Waste	Incinerator	(3)-11/8 D/M I	9,200	12/78
30	Nana Construction	Prudhoe Bay, AK	Solid Waste	Incinerator	(4)-12/8 D/M I	18,300	12/78
31*	Wyoming State (4)	Rawlins, WY	Coal	Sprd. - Stoker	(3)-10/12 D/M I	13,000	11/8(
32*	Wyoming State (4)	Rawlins, WY	Coal	Sprd. - Stoker	(3)-10/12 D/M I	13,000	11/80
33	Tamko Asphalt	Knoxville, TN	Coal	Sprd. - Stoker	24 A/M III	27,200	06/79
34	Scott Paper	Everett, WA	Salt/Hog	Dutch Oven	17-B/M 210-14	260,000	06/79
35	Scott Paper	Everett, WA	Salt/Hog	Dutch Oven	Combined with 34	Incl. In #34	06/79
36	Scott Paper	Everett, WA	Salt/Hog	Dutch Oven	Combined with 34	Incl. In #34	06/79
37	Scott Paper	Everett, WA	Salt/Hog	Dutch Oven	Combined with 34	Incl. In #34	06/79
38	Scott Paper	Everett, WA	Salt/Hog	Dutch Oven	Combined with 34	Incl. In #34	06/79
39	General Motors	Norwood, OH	Coal	Sprd. - Stoker	4-B/M 156-14	41,000	06/79
40	General Motors	Norwood, OH	Coal	Sprd. - Stoker	4-B/M 156-14	41,000	06/79
41	General Motors	Norwood, OH	Coal	Sprd. - Stoker	4-B/M 156-14	41,000	06/79
42	Delco (GM)	Dayton, OH	1% S, Coal	Sprd. - Stoker	4-B/M 210-14	60,000	12/79
43*	Delco (GM) (5)	Dayton, OH	1% S, Coal	Sprd. - Stoker	4-B/M 210-14	60,000	11/80
44	Packard Ele. (GM)(6)	Warren, OH	Coal	Sprd. - Stoker	2-B/M 156-14	17,300	01/80
45*	Central Soya (7)	Marion, OH	Coal	Fluid. Bed	3-B/M 110-14	23,600	07/8

Unit No.	Customer	Location	Fuel	Firing	Equipment	Gas Volume	Start up
46	Central Soya (8)	Delphos, OH	Coal	Sprd. - Stoker	4-B/M 156-14	40,000	03/80
47*	General Motors	Norwood, OH	Coal	Sprd. - Stoker	6-B/M 156-14	65,000	09/81
48*	General Motors	Norwood, OH	Coal	Sprd. - Stoker	6-B/M 156-14	65,000	09/81
49*	Greenwood Mills (9)	Orangeburg, SC	1% S, Coal	Sprd. - Stoker	4-B/M 156-14	35,600	03/81
50*	Greenwood Mills (9)	Orangeburg, SC	1% S, Coal	Sprd. - Stoker	4-B/M 156-14	35,600	03/81
51*	B. F. Goodrich (9)	Louisville, KY	1% S, Coal	Sprd. - Stoker	4-B/M 156-14	72,000	11/81
52*	Merck & Company	Elkton, VA	.6% S, Coal	Sprd. - Stoker	4-B/M 210-19	68,900	06/82
53*	Merck & Company	Elkton, VA	.6% S, Coal	Sprd. - Stoker	4-B/M 210-19	68,900	06/82
54*	Fulton St. Hosp (3)	Fulton, VA	.4% S, Coal	Sprd. - Stoker	3-B/M 156-14	23,000	11/82
55	Ford Motor Co. (6)	Brookpark, OH	Coal	Sprd. - Stoker	2C B/M IV	2,828	08/81
56	Ford Motor Co. (6)	Brookpark, OH	Coal	Sprd. - Stoker	3C B/M IV	4,362	09/81
57	Ford Motor Co. (6)	Brookpark, OH	Coal	Sprd. - Stoker	3C B/M IV	4,362	09/81
58	Ford Motor Co. (6)	Brookpark, OH	Coal	Sprd. - Stoker	3C B/M IV	4,362	10/81
59	Ford Motor Co. (6)	Brookpark, OH	Coal	Sprd. - Stoker	3C B/M IV	5,380	10/81
60*	Australian Iron & Steel (10)	Port Kembla,Australia	Coal	Pulverized	9-B/M210-19	191,840	10/83
61	VM of AM. (6,18)	Sterling Heights, MI	Coal	Sprd. - Stoker	144 D/M I	10,200	11/82
62	VM of AM. (6,18)	Sterling Heights, MI	Coal	Sprd. - Stoker	144 D/M I	10,200	01/83
63	VM of AM. (6,18)	Sterling Heights, MI	Coal	Sprd. - Stoker	144 D/M I	10,200	12/84
64	Occidental Chem (1)	White Springs, FL	Coal/Water	Slurry	4-B/M 210-14	59,000	04/82
65	James River Paper	Fitchburg, MA	Coal	Pulverized	4-BM 156-16.5	50,000	01/82

Unit No.	Customer	Location	Fuel	Firing	Equipment	Gas Volume	Start up
66*	Nissan Motor (12)	Smyrna, TN	Coal	Sprd. - Stoker	4-B/M 210-14	46,800	05/83
67*	Nissan Motor (12)	Smyrna, TN	Coal	Sprd. - Stoker	4-B/M 210-14	46,800	05/83
68*	Nissan Motor (12)	Smyrna, TN	Coal	Sprd. - Stoker	4-B/M 210-14	46,800	08/83
69	Washington Univ (13)	St. Louis, MO	Coal	Sprd. - Stoker	6-B/M 156-14	70,000	07/83
70	Washington Univ (13)	St. Louis, MO	Coal	Sprd. - Stoker	Combined with 69	Incl. In #69	07/83
71	Washington Univ (13)	St. Louis, MO	Coal	Sprd. - Stoker	Combined with 69	Incl. In #69	07/83
72*	Fort Howard Paper	Muskogee, OK	Coal	Pulverized	9-B/M 210-19	205,000	03/84
73*	Gerber Products	Fremont, MI	Coal & Waste	Sprd. - Stoker	4-B/M 210-14	60,000	02/84
74*	Gerber Products	Fremont, MI	Coal & Waste	Sprd. - Stoker	Combined with 73	Incl. In #73	02/84
75	Fort Howard Paper	Green Bay, WI	Coal, Coke	Cyclone	28-B/M 210-19	771,981	05/84
76	Fort Howard Paper	Green Bay, WI	Coal, Coke	Sprd. - Stoker	Combined with 75	Incl. In #75	05/84
77	Fort Howard Paper	Green Bay, WI	Coal, Coke	Sprd. - Stoker	Combined with 75	Incl. In #75	05/84
78	Fort Howard Paper	Green Bay, WI	Coal, Coke	Undfd. Stoker	Combined with 75	Incl. In #75	05/84
79	Fort Howard Paper	Green Bay, WI	Coal, Coke	Undfd. Stoker	Combined with 75	Incl. In #75	05/84
80	Fort Howard Paper	Green Bay, WI	Coal, Coke	Undfd. Stoker	Combined with 75	Incl. In #75	05/84
81*	General Motors (14)	Lordstown, OH	Waste, Paint	Incin. (15)	3-D/M 144-8	20,000	03/87
82*	General Motors (14)	Lordstown, OH	Waste, Paint	Incin. (15)	3-D/M 144-8	20,000	03/87
83*	Central Soya (16)	Chattanooga, TN	Coal	CFB	4-B/M 156-12	36,285	12/85
84*	Scott Paper (17)	Chester, PA	Culm	CFB	16-B/M 210-20	300,000	06/86
85	Georgia Pacific	Bellingham, WA	Salt/Hog	Dutch Oven	4-B/M 210-14	44,000	05/85

Unit No.	Customer	Location	Fuel	Firing	Equipment	Gas Volume	Start up
86	E.I. duPont	New Johnsonville, TN	Coal, 3% S	Sprd. - Stoker	6-B/M 210-14	90,000	12/85
87	E.I. duPont	New Johnsonville, TN	Coal, 3% S	Sprd. - Stoker	6-B/M 210-14	90,000	04/86
88*	General Motors (20)	Ft. Wayne, IN	4.5% S, Coal	CFB	4-B/M 210-16.5	58,557	04/87
89*	General Motors (20)	Ft. Wayne, IN	4.5% S, Coal	CFB	4-B.M 210-16.5	58,557	04/87
90*	Ione Energy (21)	Ione, CA	Lignite	CFB	6-B/M 210-14	83,427	12/86
91*	Mesquite Lake (21) Resource Recovery	Imperial Valley, CA	Manure	Mult. Hearth/CFB	7-B/M 210-19	142,200	01/88
92*	Mesquite Lake (21) Resource Recovery	Imperial Valley, CA	Manure	Mult. Hearth/CFB	Combined with 91	Incl. in #91	01/88
93	College of Wooster (6)	Wooster, OH	Coal	Sprd-Stoker	1-B/M 108-14	6,000	12/87
94*	University of North Carolina	Chapel Hill, NC	Coal	CFB	6-B/M 256-16	107,000	04/91
95*	University of North Carolina	Chapel Hill, NC	Coal	CFB	6-B/M 256-16	107,000	04/91
96*	Midway Enviro. (22)	Stroud, OK	Med. Waste	Incinerator	3-B/M 210-19(24)	41,000	06/8
97*	E.I. duPont (23)	Orange, TX	Haz. Waste	Incinerator	8-B/M 210-14	125,000	08/90
98*	Evanston Hospital (22)	Chicago, IL	Med. Waste	Incinerator	1-DEP 144-12 (24)	9,000	12/89
99	Omega Conversions	Melbourne, Australia	Med. Waste	Incinerator	1-B/M 180-19	15,000	05/91
100	Northern States Power	Mankato, MN	RDF	Boiler	6-B/M 210-16.5(26)	89,000	10/90
101	Northern States Power	Mankato, MN	RDF	Boiler	6-B/M 210-16.5(26)	89,000	12/90
102*	New Hanover Cty.	Wilmington, NC	MSW	Incinerator	4-B/M 256-19(26)	78,360	07/91
103*	Waste Management	Apopka, FL	Med. Waste	Incinerator	1-DEP 144-16.5(24)	36,844	06/91
104	Christ Hospital	Cincinnati, OH	Med. Waste	Incinerator	1-DEP 108-14 (24)	10,120	07/9

Unit No.	Customer	Location	Fuel	Firing	Equipment	Gas Volume	Start up
105	E.I. duPont	Deep Water, NJ	Haz. Waste	Incinerator	4-B/M 210-14	40,600	
106	VA Medical Center	Gainesville, FL	Med. Waste	Incinerator	1-DEP 54-12(24)	6,000	
107	Merck Pharmaceutical (27)	West Point, PA	Pharm. Waste	Incinerator	3-B/M 156-10 (24)	42,630	

** A site is classified as a "boiler" if its primary purpose is to produce steam (even though it may burn waste fuels), and an "incinerator" if its primary purpose is waste disposal (even though it may produce steam).

Notes: * New Sources -- all others are retrofit.

(1) Plant is onw owned by Sherex Chemical.
(2) Plant is now owned by Hooker Chemical.
(3) Sold to Keeler Boiler.
(4) Sold to International Boiler.
(5) Sold to Foster Wheeler.
(6) Side-stream system.
(7) Sold to Johnston Boiler.
(8) Sold to Midwesco Energy Systems.
(9) Sold to Babcock & Wilcox.
(10) Sold to Babcock Australia Ltd.
(11) Division of Hooker Chemical.
(12) Sold to Daniel Construction Company.
(13) Sold to Fred Weber Inc.
(14) Sold to Industronics.
(15) Followed by heat recovery boiler.
(16) Sold to Pyropower Corporation.
(17) Lurgi/CE Boiler, Bechtel A&E.
(18) Now Owned by Chrysler.
(19) Converted to Beta Design.
(20) Sold to Riley Stoker.
(21) Sold to Lurgi Corporation.
(22) Sold to Basic Environmental Engineering.
(23) A & E is Ford Bacon and Davis.
(24) Includes Dry Injection Acid Gas Control.
(25) Modules added 7/88 - 8 B/M 210-19.
(26) Includes Dry Scrubber Acid Gas Control.
(27) Sold to Kennedy Van Saun

(Revised June 2, 1992)
q:\oldff\install.mia

8/28/92 AATA

City of Cerritos - Recommend Denial of application for RRF

(1) Doug Beason

Get copy of Isabelle Medical decision

Draft letter Hand to CMB ASAP

Check Florida 1st and get Doug Beason involved in denial. Get Legal to

Class I impact - Check Clean Air.

Mercury issues and level

Reduction of emissions to avoid PSD is significant enough that the project should be resubmitted

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY-REGION IV
AIR, PESTICIDES AND TOXICS MANAGEMENT DIVISION
AIR ENFORCEMENT BRANCH
345 Courtland Street, N.E.
Atlanta, Georgia 30365
Fax Number: (404) 347-3059

FACSIMILE TRANSMISSION SHEET

DATE: 9-3-92 NUMBER OF PAGES (including this sheet) 5

TO: Mirza Baig PHONE: 904-488-1344

ADDRESS: FDER FAX NO. 904-922-6979

FROM: Scott Davis PHONE: 404-347-5014

If the following pages are received poorly, please call Scott Davis at FTS 404-347-5014 or (404) 347-5014.

SPECIAL INSTRUCTIONS FOR RECEIVER: This is DRAFT only! Do not attach this to your ongoing correspondence. The final letter should be signed and sent to you on 9-8-92.

DRAFT

4APT-AEB

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

RE: City of Gretna Resource Recovery Facility
(Application No. AC 20-212334)

Dear Mr. Fancy:

This is to acknowledge receipt of the letter pertaining to the above referenced facility, dated August 5, 1992, comprising a revised air permit application and responses to previous EPA and FDER correspondence. The proposed project consists of one Auger combustor, with a maximum heat input rate of 128.9 mmBtu per hour, to be fired with refuse derived fuel (RDF) and tire derived fuel (TDF). The unit will have a maximum capacity of 244.95 tons per day (tpd) when charged with 80% RDF and 20% TDF. The heat generated from the combustor will be used to produce steam to power a 7.4 megawatt generator.

The City of Gretna has submitted this proposed facility for review as a non-Prevention of Significant Deterioration (PSD) source. The applicant proposes to limit NO_x emissions through selective noncatalytic reduction (SNCR), to limit PM/PM_{10} emissions through the use of a fabric filter system, to limit SO_2, HCl, Be, F, Pb, Hg, H_2SO_4 mist, and dioxin/furan emissions through the use of a spray dryer scrubber/fabric filter system, and to limit CO and VOC emissions through good combustion techniques.

We have reviewed the package as submitted and have the following comments concerning completeness, compliance with the New Source Performance Standards (NSPS), and mercury:

DRAFT

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Application Completeness

SNCR: In Attachment 1, page 5, of the letter, the applicant states that:

> For the proposed Auger combustion, the application of either the NO_xOUT Process or Thermal DeNO_x will be designed for the afterburner....Vendor of the NO_xOut Process was contacted and they have verbally confirmed that a maximum NO_x removal efficiency of 60% is achievable when the urea injection process is applied to the modular afterburner unit. The final design of the NO_x control system will utilize either one of the two SNCR processes.

We request written confirmation from vendors of *both* SNCR processes guaranteeing that the SNCR control system specifically installed on this facility will have a removal efficiency of not less than 60%. Insufficient justification and deficient NO_x control efficiency will result in NO_x emissions in excess of 100 tons per year (tpy), subjecting the applicant to full PSD review.

MSW Processing Line Mass Balance: In Figure 1 of the letter, recyclables are estimated to be 48% of the total processed MSW (215 tpd of recyclables [43%] and 10 tpd of miscellaneous ferrous metals [5%]). According to the process flow diagram, recyclables and ferrous metals will be processed after reaching the tipping floor. This comingling of recyclables with the remaining waste will make the sorting and separation processes more difficult. Reliable estimates from EPA Headquarters approximate recyclables to be in the range of 25-35% of MSW (based on curbside pickups, a simpler method of obtaining recyclables). Consequently:

-What is the basis for these percentages?
-What materials in the MSW constitute the category of recyclables for the Gretna facility?
-What materials constitute non-combustibles and household hazardous wastes?

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DRAFT

Calculations: Appendix A of the application gives the outlet temperature to be 1,810°F at 170,500 acfm. In the revised calculations in Attachment 1 of the letter, the outlet temperature is calculated as 1,818°F at 170,500 acfm. Which value is correct?

What is the basis for obtaining a value of 130 ppmv for CO emissions at the outlet of the combustor in the revised calculations (Attachment 1, section 2.4)? In Appendix A of the application, the value is 300 ppm (hourly and annual) on the basis of good combustion practices. No justification is given for this lower value, as the combustor, fuel types, rates of firing and combustion temperatures for the process remain the same. A value of 132 ppmv for CO emissions will produce 100 tpy of CO, making the facility subject to full PSD review.

NSPS: Municipal Waste Combustion

EPA suggests the permit drafted for this source include language directing the source to comply with the requirements of the upcoming federal regulations governing municipal waste combustors (MWC's) capable of charging less than 250 tpd of MSW, if the draft permitted limits are less stringent. EPA will be promulgating regulations governing MWC's with combustor units charging less than 250 tpd, on or before October 1, 1992. These regulations will be applicable to units charging between 40 and 250 tpd. The proposed Gretna facility will be subject to the NSPS, as new MWC units will be designated as units commencing construction after December 20, 1989. These emission standards will be based on maximum achievable control technology and will include emission limits for particulate matter, sulfur dioxide, hydrogen chloride, oxides of nitrogen, carbon monoxide, mercury, lead, cadmium, and dioxins and dibenzofurans.

Mercury Emissions

Mercury emissions from municipal waste incinerators are a subject of increasing concern for the citizens of Florida, environmental organizations, and governmental regulatory agencies. Options such as source separation for products containing mercury (dry cell batteries, thermometers, flourescent light bulbs) should be fully addressed and considered for implementation. Additionally, the use of control technology for the reduction of mercury emissions, such as activated carbon injection systems, should be explored.

The City of Gretna has not submitted a complete and thorough application for the proposed facility. Prior to further review by EPA staff at Region IV, the applicant must fully address these previously outlined issues.

DRAFT

Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

DRAFT

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To:	Location:
To:	Location:
To:	Location:
From:	Date:

Interoffice Memorandum

TO: Carol M. Browner

FROM: Howard L. Rhodes

DATE: September 4, 1992

SUBJ: City of Gretna, Proposed Resource Recovery Facility; AC20-212334 - Recommend "Intent to Deny"

The Bureau of Air Regulation is recommending an "Intent to Deny" the construction permit for the above referenced project for the following reasons:

1. Markets For Contaminated Recyclables:

   The City of Gretna produces about 6 tons/day (TPD) of MSW but would like to be permitted for a 500 TPD facility, from which only 246 TPD of MSW will be combusted in the proposed incinerator, and the rest separated and sold as recyclables. In their response, dated Aug. 5, 1992, the applicant states that it does not have firm contracts or written statements from potential purchasers of recyclable materials. This type of information is essential to assure the Department that the facility will operate as intended.

2. Falsely Stated Information:

   In their response, dated Aug. 5, 1992, the applicant states "In addition, Mr. Robert McKnight of the Executive Office of the Governor has offered assistance in providing additional quantities of MSW for this project." When Mr. McKnight was contacted regarding this, he said that this was a misrepresentation of facts, in that the Governor's Office has no quantities of MSW to offer to any organization (see attached memo).

3. Air Emission Equipment/Vendor Design Information:

   The applicant does not have a specific baghouse vendor, make, model number, or emission limit guarantee. The applicant does not want to provide any information as to the type of fans that will be used in the proposed incinerator system.

4. Continuous Emissions Monitoring Equipment/Vendor Design Information:

   The applicant does not have specific vendor (design) information or a guarantee from any specific Continuous Emission Monitor manufacturer that can meet the Department standards to monitor the SO_2 or NOx emissions. The applicant claims that a continuous monitoring system for CO is not necessary. We disagree with this.

5. MSW Weighing Equipment/Vendor Design Information:

   The applicant refuses to provide us with the make and model number for the automatic weighing device that feeds the waste to the combustor, along with the manufacturer's guarantee that the weigh scales will always be calibrated to within + or - 2.0%. If the weigh scales exceed a 2.0% variation, the charging rate would exceed the 250 TPD limitation, thus subjecting this facility to a more stringent requirements of Subpart Ea.

6. Lack of Mercury Emission Control:

   The applicant has not addressed how mercury or other air toxic pollutant emissions will be controlled.

7. Significant Changes Made to the Original Application:

   The applicant has made significant changes to the original construction permit application (reducing SO_2 emissions from 202.4 TPY to 65.7 TPY; NOx emissions from 248.8 TPY to 99.16 TPY; and CO emissions from 227.3 TPY to 98.11 TPY). These reductions have been made to avoid more stringent review and are not consistent with the original application and design parameters. The applicant has failed to provide a vendors guarantee that any SNCR system installed on this facility will have a removal efficiency of not less than 60% for the control of NOx emissions. Insufficient efficiency will result in NOx emissions in excess of 100 TPY, subjecting the facility to a full PSD review.

Due to the above mentioned concerns, I have decided to issue an intent to deny an air construction permit to The City of Gretna.

HLR/MB/plm

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To _____ Location _____

To _____ Location _____

To _____ Location _____

From _____ Date _____

Interoffice Memorandum

To: File

Thru: G. Preston Lewis

From: Mirza Baig MB

Date: Aug 26, 1992

Subj: Conversation Record with the Governor's Office
City of Gretna RRF AC 20-212334

While reviewing KBN's response (letter dated Aug 5, 1992) to our incompleteness item letter (dated June 10, 1992) for the above referenced project, today, I contacted the Office of the Governor to verify a statement contained in the above mentioned response that "Mr. Robert McKnight of the Executive Office of the Governor has offered assistance in providing additional quantities of MSW for this project".

Mr. McKnight stated to me that this was a misrepresentation of facts, in that The Governor's Office has no quantities of MSW to offer to any organization. Further, Mr. McKnight indicated that the only assistance he provided this project was to brief them on the Governor's recycling initiative and introduce them to local government recycling coordinators, as he would do any citizen. In fact Mr. McKnight further stated that "he would not object if DER denied the permit just on the fact that KBN/City of Gretna made these distorted statements". He also asked me to make a record of this conversation.

cc: Mr. Robert McKnight, The Governor's Office

Mirza, you may want to consider the following

1. Question 1 - The following could replace the third sentence on.

The proposed sources will be subject to federally enforceable restrictions that will limit the charging rate of each unit to 250 TPD (20,834 lbs./hr.) and emissions of regulated pollutants to less than 250 TPY. Pursuant to 40 CFR 60 Subparts A and Ea, any future relaxation of the limits on charging rate will make the sources subject to 40 CFR 60 Subpart Ea. Pursuant to 40 CFR 52.21(r) and Rule 17-2.500(g), F.A.C., the future relaxation of a restriction on pollutant emissions will make facility subject to a full PSD new source review (including BACT), on an "as though never constructed" basis. If there is any potential for the relaxation of restrictions, then it may be to your advantage to consider a full PSD new source review and compliance with the requirements of 40 CFR 60 Subpart Ea at this time. Please acknowledge of the implications in writing.

2. The second sentence in question 2 could be changed to read as follows.

Identify each source that will provide MSW and scrap tires for the incinerator which is not in the City of Gretna. Provide the quantity that each source will furnish.

3. The fourth sentence in Question 2 could be changed to read as follows.

Identify each potential purchaser of the energy and recyclables that will be generated by the proposed facility. Provide a written statement from each of the identified potential purchasers acknowledging their intent to consider the purchase of energy and/or recyclables. Please provide copies of any contracts that have been negotiated.

4. Question 3 could be reworded as follows.

Identify the source and quantity of medical waste that will be received at the proposed facility.

5. You may want to find out if the City of Gretna proposes to process soils from petroleum clean-up sites or CERCLA clean-up sites. If so, they will need to identify the quantity and nature of waste.

6. In question 4, is there a reason that you specify a range of 2.080% rather than 2.0%?

7. Question 7 could be ~~re~~ reworded as follows.

What is the quantity, pressure, and temperature of the steam that you propose to generate?

8. Do you want to know what type of steam turbine they propose to install?

9. The second sentence of Question 11 might be reworded as follows.

Please submit the preliminary engineering calculations that were used to determine that the proposed filtration area of the baghouse will be adequate.

10. Question 13 is excellent as you wrote it. The following is just a suggestion.

Please describe the type of fans that will be used in the proposed incinerator system. Explain whether the proposed fans will be fixed speed or variable speed fans and provide copies of the manufacturer's curve for each fan, and the proposed system curves.

11. Would the following be appropriate for Question 14?

Based on the permit application the proposed maximum 1-hour emissions of SO2 and NOx are almost twice the estimated annual average emissions. The maximum hourly emissions of SO2 and NOx would be sufficient to trigger PSD new source review if the source were continuously operated at the maximum rate. Please provide an describe the mechanism that will be used to provide the Department with continuous reasonable assurance (i.e., continuous emission monitoring) that the emissions of SO2, NOx, and CO will not reach the levels that would trigger a full PSD new source review. Submit the make and model number of any monitors that you propose to install.

annual average is 200 ppm and 1-hour max is 400 ppm; and the SO2 1-hour annual average is 117 ppm and 1-hour maximum is 234 ppm). Do you plan to install continuous emission monitors to demonstrate compliance with the hourly and annual emission rates for NOX, SO2 and CO ? If so submit the make and model No. for these monitors.

15. Submit a plot plan showing the ash transporting and storage system and the roads in the plant yards. How do you plan to control the fugitive emissions generated due to the vehicular traffic ?

16. Maximum concentration values for sulfur dioxide emissions in Table 5-5 appear to be in error. Please provide a corrected Table 5-5.

17. (See attached sheets)

John Matthews
Fla Reduction Corp.
904-489-3711

GRETNA

1. Process Input Rate = 20,400 #/Hr. or 10.2 TPH
or 244.8 Tons/Day.

Need a weish scale accurate to within ± 2.090%.
Otherwise it exceeds 250 Tons/day.

2. Are there going to be two seperate piles of
wastes (a) 80-20 Mixture (b) 75-25 Mixture.

3. Solid waste processing plant will be designed to process upto 500 TPD of MSW
Unique handling process - removes 99% of the bead wire & 96% of all wire.
Can process up to 45 TPD of scrap tires
or 3750 #/Hr. of tires.

Page 8, Sec 2.1, 2nd Paragraph.

RDF	TPF
6000 BTU/Lb. - Max	16,250 BTU/Lb. - Max
5500 BTU/Lb. - Avg.	15,500 BTU/Lb. - Avg.

4. 80-20 Ratio is heat input NOT weight %. (10.2 TPH)
9.37 TPH of RDF and 0.83 TPH of TDF.
and 75-25 Ratio: Total of (9.83 TPH.)
8.79 TPH of RDF and 1.04 TPH of TDF.

What % age of the time is allotted to ~~Either~~ type of mixture?

✓5. Auger Combustor System — Need details

✓6. An auxiliary burner is provided in the afterburner for flame stabilization & Temp control which uses natural gas or NO. 2 fuel oil (?).
page 10.

7. Lime Silo. Details of the vent filter.
3.2 TPD of lime.

8. location of lime Spray

✓9. Ash Storage bin — baghouse — specification sheet

10. Fugitive emissions are expected from transporting and Storage of ashes. (What are the controls?)

11. SO_2 emissions. Annual 117 ppm 1-Hr. Max 234 ppm
75% control! (Why 46.2 #/hr & not 92.4 #/hr)
DLI/FF or SD/FF ?

✓12. Where is the waste coming from? Is there any medical waste included? Is there any hazardous waste included? Do you have a contract to sell the power? ~~How~~ is the waste now being handled? How much is the tipping fee now and what will it be when this plant is in operation? Do you have any contracts to sell the recyclables? What happens to the ~~Non~~recyclable waste if vendors do not pick it up?

✓13. Combustor to be equipped with WAPC JET III Fabric filter or Equavalent! Be more precise need a specification sheet for the baghouse.

14. NOx Control: Starved air in primary chamber 17 to 18% O_2 and low excess air in secondary chamber 8% O_2 & 9% CO_2. 1500°F primary chamber temp.

1-Hr. Max	400 ppm	113.6 #/Hr.	—
Annual	200 ppm	56.8	248.8 TPY.

15. CO & VOC

CO: 300 ppm, 1 Hr. Avg. — 51.9 Lbs/Hr. — 227.3 TPY

VOC: 90 ppm, 1-Hr. Avg. — 8.88 Lbs/Hr. — 38.9 TPY.

16. Hcl

Spray dryer designed for 80% removal of Hcl

17. Fan Speed is variable or fixed — Fan Curve?

18. 17-2.500 (2)(g) Relaxation of Restrictions on Pollutant Emitting Capacity.

Source Obligation 40 CFR 52 part 5221 — paran O
40 CFR 60 - Trib 60.14 or 15

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

NAME(S): Mr. Ed Middlesmt, P.E.
Air Program

DEPARTMENT/COMPANY: Pensacola, D.E.R.

DATE: 9-11-92

~~PHONE~~: [CITY OF GRETNA, RRF INTENT TO DENY]

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 8

****

FROM: Mirza Baig

DIVISION OF AIR RESOURCES MANAGEMENT

BUREAU: Air Permitting

OFFICE PHONE: 904-488-1344 FAX PHONE: (904)922-6979

SENDER: Mirza Baig.

COMMENTS: Dear Ed/Andy

If you have any questions or comments I'll be available till atleast 5:30 pm today.

Thanks, Mirza Baig.

HAVE A NICE DAY!

To: Howard C. Rhodes
From: Clair Fancy
Date: Sept 11, 92
Subj: City of Gretna – RRF (AC20-212334)
Intent to Deny.

A construction permit application was received on April 23, 1992 for the above referenced project. The applicant proposed to construct a facility that would receive 500 tons per day (TPD) of Municipal Solid Waste (MSW) from which 245 TPD of MSW would be combusted to generate 7.41 MW and the rest MSW sold as recyclables.

The applicant has failed to assure the Dept. that it has firm contracts to sell the contaminated recyclables / power and does not want to provide details on the pollution control equipment it plans to install. Without these assurances the Air Bureau ~~would not~~ ~~be~~ cannot issue the construction permit. I therefore recommend you to issue an intent to deny.

Mirza 9/23/92

Please summarize the meeting in a memo to Hon. Larry Thomas on City Gretna 9/22/92

Thanks

Preston

CITY OF GRETNA - RRF
REASONS FOR DENIAL

ISSUE (1)

1. Significant Changes Made to the Original Application:

The applicant has made significant changes to the original construction permit application (changing SO_2 emissions from 202.4 TPY to 65.7 TPY; NO_x emissions from 248.8 TPY to 99.16 TPY; and CO emissions from 227.3 TPY to 98.11 TPY). These reductions appear to have been made to avoid more stringent review and are not consistent with original application and design parameters.

ISSUE (2)

2. Market for Contaminated Recyclables:

The City of Gretna produces about 6 tons per day (TPD) of MSW but would like to be permitted for a 500 TPD facility, from which 244.8 TPD of MSW will be combusted in the proposed incinerator, and the rest separated and sold as recyclables. The applicant has failed to provide reasonable assurance that it has firm contracts or written statements from potential recyclable purchasers acknowledging their intent to consider the purchase of contaminated recyclables and/or energy. This type of information is essential to assure the Department that the facility will operate as intended.

3. Air Emissions Equipment/Vendor Design Information:

The applicant has failed to supply the name of a specific baghouse vendor that will guarantee emission limits. The applicant also failed to provide any information as to the type of fans that will be used in the proposed incinerator system. This information is needed to assure the Department that the baghouse and I.D. fans will operate properly.

4. SO_2 and NO_x Continuous Emissions Monitors:

The applicant has failed to supply the Department with design information or guarantee from any continuous emission monitor manufacturer that can meet the Department's standards to monitor the SO_2 and NO_x emissions.

5. Carbon Monoxide (CO) Continuous Emission Monitor:

The applicant claims that a CO continuous emissions monitor (CEM) is not necessary. The applicant has revised CO emission estimates from 227.3 tons per year (TPY) to 98.11 TPY. If the actual CO emission meets or exceeds 100 TPY, this project will be subject to PSD regulations which will be subject to more stringent review. The Department considers installation of a CO CEM to be essential to provide assurance that CO emissions will be less than 100 TPY.

6. NO_X Control System:

The applicant has failed to select a specific Selective Non-Catalytic Reduction (SNCR) process to control the NO_X emissions. The Department would require assurance from either the NO_X OUT process or Thermal $DeNO_X$ vendor that it can guarantee at least a 60% NO_X removal efficiency. If the control efficiency is less than 60%, the NO_X emissions will exceed 100 TPY, subjecting the applicant to full PSD review.

ISSUE

7. MSW Weighing Equipment/Vendor Design Information:

The applicant has failed to provide the Department with a specific vendor for the automatic weighing device that feeds the MSW (RDF/TDF) to the combustor along with the manufacturer's guarantee that the weigh scales can be calibrated to within + or - 2.0%. If the weigh scales exceed a 2.0% limitation, the charging rate would exceed the 250 TPD limitation, thus subjecting this facility to a more stringent requirement of 40CFR60, Subpart Ea. The Department requires this information before a permit can be issued.

8. Lack of Mercury Emission Control:

The applicant has failed to provide the Department with information on how mercury or other air toxic pollutant will be controlled. The Department views that a waste-to-energy facility with a process input rate of 245 TPD of RDF/TDF should be equipped with mercury and other air toxic pollutant control devices.

Pursuant to Section 403.815, Florida Statutes and Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Deny Permit. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

A person whose substantial interests are affected by the Department's permit denial 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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

SEP 11 1992

RECEIVED

SEP 18 1992

Division of Air
Resources Management

4APT-AEB

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

RE: City of Gretna Resource Recovery Facility
(Application No. AC 20-212334)

Dear Mr. Fancy:

This is to acknowledge receipt of the letter pertaining to the above referenced facility, dated August 5, 1992, comprising a revised air permit application and responses to previous EPA and FDER correspondence. The proposed project consists of one Auger combustor, with a maximum heat input rate of 128.9 mmBtu per hour, to be fired with refuse derived fuel (RDF) and tire derived fuel (TDF). The unit will have a maximum capacity of 244.95 tons per day (tpd) when charged with 80% RDF and 20% TDF. The heat generated from the combustor will be used to produce steam to power a 7.4 megawatt generator.

The City of Gretna has submitted this proposed facility for review as a non-Prevention of Significant Deterioration (PSD) source. The applicant proposes to limit NO_x emissions through selective noncatalytic reduction (SNCR), to limit PM/PM_{10} emissions through the use of a fabric filter system, to limit SO_2, HCl, Be, F, Pb, Hg, H_2SO_4 mist, and dioxin/furan emissions through the use of a spray dryer scrubber/fabric filter system, and to limit CO and VOC emissions through good combustion techniques.

We have reviewed the package as submitted and have the following comments concerning completeness, compliance with the New Source Performance Standards (NSPS), and mercury:

Application Completeness

SNCR: In Attachment 1, page 5, of the letter, the applicant states that:

> For the proposed Auger combustion, the application of either the NO_xOUT Process or Thermal $DeNO_x$ will be designed for the afterburner....Vendor of the NO_xOut Process was contacted and they have verbally confirmed that a maximum NO_x removal efficiency of 60% is achievable when the urea injection process is applied to the modular afterburner unit. The final design of the NO_x control system will utilize either one of the two SNCR processes.

We request written confirmation from vendors of *both* SNCR processes guaranteeing that the SNCR control system specifically installed on this facility will have a removal efficiency of not less than 60%. Insufficient justification and deficient NO_x control efficiency will result in NO_x emissions in excess of 100 tons per year (tpy), subjecting the applicant to full PSD review.

MSW Processing Line Mass Balance: In Figure 1 of the letter, recyclables are estimated to be 48% of the total processed MSW (215 tpd of recyclables [43%] and 10 tpd of miscellaneous ferrous metals [5%]). According to the process flow diagram, recyclables and ferrous metals will be processed after reaching the tipping floor. This comingling of recyclables with the remaining waste will make the sorting and separation processes more difficult. Reliable estimates approximate recyclables to be in the range of 25-35% of MSW (based on curbside pickups, a simpler method of obtaining recyclables). Consequently:

-What is the basis for these percentages?
-What materials in the MSW constitute the category of recyclables for the Gretna facility?
-What materials constitute non-combustibles and household hazardous wastes?

Calculations: Appendix A of the application gives the outlet temperature to be 1,810°F at 170,500 acfm. In the revised calculations in Attachment 1 of the letter, the outlet temperature is calculated as 1,818°F at 170,500 acfm. Which value is correct?

What is the basis for obtaining a value of 130 ppmv for CO emissions at the outlet of the combustor in the revised calculations (Attachment 1, section 2.4)? In Appendix A of the application, the value is 300 ppm (hourly and annual) on the basis of good combustion practices. No justification is given for this lower value, as the combustor, fuel types, rates of firing and combustion temperatures for the process remain the same. A value of 132 ppmv for CO emissions will produce 100 tpy of CO, making the facility subject to full PSD review.

NSPS: Municipal Waste Combustion

We suggest that the permit drafted for this source include language directing the source to comply with the requirements of the upcoming federal regulations governing municipal waste combustors (MWC's) capable of charging less than 250 tpd of MSW, if the draft permitted limits are less stringent. EPA will be proposing regulations governing MWC's with combustor units charging less than 250 tpd, on or before October 1, 1992. These regulations will be applicable to units charging between 40 and 250 tpd. The proposed Gretna facility will be subject to the NSPS. These emission standards will be based on maximum achievable control technology and will include emission limits for particulate matter, sulfur dioxide, hydrogen chloride, oxides of nitrogen, carbon monoxide, mercury, lead, cadmium, and dioxins and dibenzofurans.

Mercury Emissions

Mercury emissions from municipal waste incinerators are a subject of increasing concern for the citizens of Florida, environmental organizations, and governmental regulatory agencies. Options such as source separation for products containing mercury (dry cell batteries, thermometers, fluorescent light bulbs) should be fully addressed and considered for implementation. Additionally, the use of control technology for the reduction of mercury emissions, such as activated carbon injection systems, should be explored.

The City of Gretna has not submitted a complete and thorough application for the proposed facility. Prior to further review by my staff at Region IV, the applicant must fully address these previously outlined issues.

Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,

Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: M. Buig
C. Holladay
C. Middleswart, NW Dist.
CHF/PL

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

SEP 11 1992

4APT-AEB

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

RE: City of Gretna Resource Recovery Facility
(Application No. AC 20-212334)

Dear Mr. Fancy:

This is to acknowledge receipt of the letter pertaining to the above referenced facility, dated August 5, 1992, comprising a revised air permit application and responses to previous EPA and FDER correspondence. The proposed project consists of one Auger combustor, with a maximum heat input rate of 128.9 mmBtu per hour, to be fired with refuse derived fuel (RDF) and tire derived fuel (TDF). The unit will have a maximum capacity of 244.95 tons per day (tpd) when charged with 80% RDF and 20% TDF. The heat generated from the combustor will be used to produce steam to power a 7.4 megawatt generator.

The City of Gretna has submitted this proposed facility for review as a non-Prevention of Significant Deterioration (PSD) source. The applicant proposes to limit NO_x emissions through selective noncatalytic reduction (SNCR), to limit PM/PM_{10} emissions through the use of a fabric filter system, to limit SO_2, HCl, Be, F, Pb, Hg, H_2SO_4 mist, and dioxin/furan emissions through the use of a spray dryer scrubber/fabric filter system, and to limit CO and VOC emissions through good combustion techniques.

We have reviewed the package as submitted and have the following comments concerning completeness, compliance with the New Source Performance Standards (NSPS), and mercury:

KBN
904/332-4189
Dai Jang

CITY OF GRETNA MTG 9/22/92

List of Attendants

Name	Company
Tai Tang	KBN Engineering
Bob Tyren	E.I.S. 904 632 2107
Harry Meshaw	EIS 904 632 2107
MIKE HARLEY	DER - 904-488-1344
MIRZA P. BAIG	DER - " -
PRESTON LEWIS	DER/AIR REGULATION/AIR PERMITTING
John Matthews	Fla. Rock Industries
David A. Buff	KBN
Evelyn Rollins	Mayor City of Gretna
HAROLD KNOWLES	CITY OF GRETNA ATTORNEY
Clete Holladay	DER 904-488-1344
Clair Fancy	DER " "
DOUGLAS BERSON	DER/OGC 488-0730

City of Gretna 9/23/92

Marga

See that Jan Roe

Clark gets copies

of the "intent" and the

Summary. Also, copy

her for all future input

from applicant and our response

Thanks

Peter

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee
To: John Brown Location:
To: Preston Location:
To: mirza Location:
From: Date:

Interoffice Memorandum

10/6 No commitment was made to give Herman intent for his project as proposed.
Attorney

To: File

Thru: G. Preston Lewis Preston

From: Mirza P. Baig M.B.

Date: Sept 24, 1992

Subj: Meeting Regarding Intent To Deny
City of Gretna RRF AC 20-212334

An Intent To Deny an air construction permit was issued to the City of Gretna on September 11, 1992 for the above referenced facility. Upon applicant's request a meeting was held on September 22, 1992 to discuss several issues. The following was agreed to:

1. The applicant will submit a justification to the Department why significant changes to the original permit application was made, and provide details of the quantity and the origination of MSW that would be received at this facility, along with reasonable assurance that it has firm contracts or written statements from potential contaminated recyclable purchasers.

2. The applicant will submit a detailed response to the Department regarding the eight reasons mentioned in the "Intent to Deny" letter. The Department will review their response and make a determination on this project.

3. The applicant voluntarily accepted not to publish the notice of "Intent to Deny". Instead, the applicant will publish the notice of "Intent to Issue", if and when instructed by the Department to do so.

4. The applicant will immedietely file for an extension of time with the OGC.

cc: Doug Beason, OGC
Ed. Middleswart, NWD
Jewel Harper, EPA
Chris Shaver, NPS
Tom Moody, NWD
Jan Rae Clark, BSW
Clair Fancy, BAR
Mike Harley, BAR
Howard Rhodes, BAR
G. Neubauer, NWDB
Jim Pennington, BAR
Cleve Holiday, BAR

I N T E R O F F I C E M E M O R A N D U M

Date: 28-Sep-1992 04:42pm EST
From: Rebecca Brown TAL
BROWN_R
Dept: Office General Counsel
Tel No: (904)488-9730
SUNCOM:

TO: Susan Brice PEN (BRICE_S)

CC: Patty Adams TAL (ADAMS_P)

Subject: Extension of Time Request

On September 28, 1992, we received a request for extension of time concerning City of Gretna, Waste To Energy, Permit No. AC20-212334.

I N T E R O F F I C E M E M O R A N D U M

Date: 30-Sep-1992 08:15am EST
From: Preston Lewis TAL
LEWIS_P
Dept: Air Resources Management
Tel No: 904/488-1344
SUNCOM:

TO: Doug Beason TAL (BEASON_D)

CC: Mirza Baig TAL (BAIG_M)
CC: Thomas W. Moody PEN (MOODY_T)
CC: Jan Rae Clark TAL (CLARK_JR)

Subject: RE: City of Gretna/air permit

I agree! The most confusing thing about this application is the source of the refuse, the type of reduce/reuse/recycling plan the users of the facility will practice or plan to implement and where the recyclables (contaminated with food waste and reeking) can be marketed. In order for The Division of Air Resources to have assurance to issue an air permit, the applicant most provide much of the information required for a Solid Waste Facility permit.

CITY OF GRETNA – MEETING

10/13/92 List of attendants

NAME	COMPANY	PHONE
MIRZA P. BAIG	D.E.R./BAR	904-488-1344
John Matthews	Fla. Legislature Gov.	904-488-3711
JAN RAE CLARK	DER/SW	904-922-6104
W. DOUGLAS BEASON	DER/OGC	904-488-9730
John Glunn	DER/BAMA	904-488-6140
David Buff	KBN	904-331-9000
Harry Meshaw	EIS	904 632 2107
JOHN BROWN	FDER/BAR	904 488 9730
PRESTON LEWIS	FDER/BAR	(904) 488-1344

10/13/92

City of Gretna

Source of MW – Need to include in contracts that only waste acceptable to Florida law be accepted.

Need to exclude HW, ~~HHW~~, Bio HAZ Waste

Need to include intents and Contracts as a requirement prior to operating

CITY OF GRETNA – MEETING

10/13/92 List of attendants

NAME	COMPANY	PHONE
MIRZA P. BAIG	D.E.R./BAR	904-488-1344
John Matthews	Fla. Reduction Corp.	904-488-3711
JAN RAE CLARK	DER/SW	904-922-6104
W. DOUGLAS BEASLEY	DER/OGC	904-488-9730
John Glenn	DER/BAMA	904-488-6140
David Buff	KBN	904-331-9000
Harry Meshaw	EIS	904 632 2107
JOHN BROWN	FDER/BAR	904 488 9730
PRESTON LEWIS	FDER/BAR	(904) 488-1344

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 10, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Honorable Evelyn Rollins, Mayor
Post Office Box A
Gretna, Florida 32332-1000

Dear Mayor Rollins:

Re: Gadsden County - A.P.
City of Gretna Resource Recovery Facility
AC 20-212334 (Incinerator)

On October 13, 1992, the Bureau of Air Regulation received your response to the Department's letter of intent to deny a permit for the above referenced project. The data needed to complete the review of your application is inadequate. Please provide the following information:

1. Provide either a copy of a solid waste permit application or a response to the solid waste concerns included in the Department's Intent to Deny a permit.

2. When does the City of Gretna anticipate negotiating reciprocal agreements with all suppliers of municipal solid waste (MSW) allowing approximately 10 to 15 percent (by weight) of all MSW received by Gretna to be returned to the originating source? Provide a copy of proposed contract.

3. Please provide us with any additional information (letters of intent) you may have on the markets for (contaminated) recyclables.

4. Submit the revised emission estimates for all pollutants, including calculation sheets.

5. The original permit application stated that the tire processing operation can handle up to 45 tons per day (TPD) of scrap tires of which approximately 60 percent by weight will become tire derived fuel (TDF). What is the maximum amount of tires in terms of number per hour, TPD and TPY? In the

submittal dated October 12, 1992 why were the tires not included in the projected MSW composition calculations? Submit a composition analysis of TDF. What will be the maximum amount of tires (#/hr) in a ton of TDF? How can you assure the Department that the heat value of TDF and refuse derived fuel (RDF) fed to the combustor will not exceed 128.9 MMBtu/hr on a continuous basis.

6. The Thermo Flex baghouse is designed to handle a flow of 49,600 ACFM with a filtering area of 40,480 sq. feet while the United McGill baghouse is designed to handle a flow of 70,100 ACFM with a filtering area of 20,000 sq. ft. Which baghouse (or equivalent) do you propose to install? Submit a "D" size drawing of the process flow diagram showing all volumetric flow rates (ACFM or DSCFM) and material balance (not in a tabular form) including the wood chipping operation and all storage silos. Provide more details on the TDF/RDF storage/mixing/feeding operations.

7. Provide us with the names and phone numbers of sales persons at the Nalco Fuel Tech and the Merrick Corporation so that we may contact them for more information on the air pollution control equipment.

8. During the October 13, 1992 meeting it was agreed that an activated carbon injection system will be installed to control mercury emissions from this source. Provide us with the details including flow diagram, injection rates and location, etc.

9. The Department needs assurance that all continuous emissions monitoring systems selected for this project will fully comply with all existing EPA and State of Florida rules and regulations including the locations for all continuous emission monitoring systems and source sampling locations. Since this is a "green-field" facility, the Department <u>will not</u> be inclined to waive sampling points, locations, or other requirements pursuant to the provisions for alternate sampling procedures and requirements.

The processing of your application will continue upon receipt of the above requested information. If you have any questions, please contact Mr. Mirza Baig at (904) 488-1344.

Sincerely,

John C. Brown, P.E.
Administrator
Permitting and Standards
Section

JB/kt

cc: Ed Middlewsart, P.E., Northwest District
Tom Moody, P.E., Northwest District
David Buff, P.E., KBN Engineering
James Carter, Gretna City Manager
John Mathews, Fl. Reduction Corp.
O. C. Allen, Financing Officer, City of Gretna
Chairman, Gadsden County Commission
Jim Lewis, Office of the Secretary, DER
Chris Shaver, National Park Service, Colorado
Jewell Harper, EPA, Atlanta
James W. Fulliam, Jr.
Mary Jean Yon, BS&HW, DER
Doug Beason, OGC

Johnathan
Call

12/8/92

O. C. Allen
City of Cretna
942 4012

cc Harold 222-3768 off.
~~Howard~~ Knowles - Attorney
* On NOV 20 letter DER
528 E. PARK AVE 561-0397 Fax
TALLAHASSEE, FL 32302 Phone

Size "D" drawing ? Mirza
Tai Timcat KBN.
#9 ? All A.E.S. 1-4
we will Copy !
Drawings are better

(904) 331-9000
Gainsville

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

NAME(S): Harold Knowles

DEPARTMENT/COMPANY:

DATE: 12-11-92

PHONE: 561-0397 (fax)

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

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FROM: Jonathan Holtom

DIVISION OF AIR RESOURCES MANAGEMENT

BUREAU: Air Regulation

OFFICE PHONE: 488-8163 ext. 95 FAX PHONE: (904) 922-6979

SENDER: Jonathan Holtom

COMMENTS: Call if you have any questions. I'll help if I can.

HAVE A NICE DAY!

Jonathan
Please File

KBN

December 30, 1992

Mr. Preston Lewis, P.E.
Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: City of Gretna Resource Recovery Facility
AC 20-212334 (MSW Incinerator)

Dear Mr. Lewis:

I am writing in reference to the telephone discussions between Mr. Tai Tang, KBN, and yourself concerning the Gretna project during the week of December 13. The City of Gretna (Gretna) intended to file for an extension of time past December 31, 1992 deadline as indicated in the September 24 letter from the Gretna attorney to the Department's Office of General Counsel. This extension would be necessary to facilitate the Department's review process of additional information requested by Department concerning the air permit application.

It is KBN's understanding that Mr. Harold M. Knowles, Esq., the attorney for Gretna, has discussed the request for extension of time with Mr. Douglas Beason, Esq. of the Department. Due to the holiday, it is uncertain if the request for the extension has been formally filed.

As also discussed, KBN would like to meet with you and your staff prior to submittal of the responses to the Department's letter of November 10. I have spoken briefly with Mr. Jonathan Holton during last week concerning the content of the Department's letter. However, further clarification and comments from you will ensure that the information submitted will be sufficient to satisfy all concerns raised by the Department. Therefore, KBN requests an informal meeting with you during the first or second week of January 1993 for this purpose. I will call you next week to arrange an appropriate time.

Your cooperation in this matter is greatly appreciated.

Sincerely,

Tai Tang

Tai T. Tang
Project Manager

TTT/tyf

cc: Douglas Beason, Esq.
Harold M. Knowles, Esq.
David A. Buff, KBN
File (2)

RECEIVED
JAN 0 4 1993
Division of Air
Resources Management

12173A1/4 KBN ENGINEERING AND APPLIED SCIENCES, INC.
1034 Northwest 57th Street Gainesville, Florida 32605 904/331-9000 FAX: 904/332-4189

KBN

FACSIMILE COVER SHEET

DATE: 12/30/92

TO: Preston Lewis

ORGANIZATION: Bureau of Air Reg. FDER

FAX NUMBER: (904) 922-6979 TELEPHONE NUMBER: (904)

FROM: Tai Tong

TOTAL NUMBER OF PAGES: 2 (including cover page)

MESSAGE INSTRUCTIONS:

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cc: Project File ✓ yes no

KBN Engineering and Applied Sciences, Inc.
1034 NW 57th Street, Gainesville, Florida, 32605, U.S.A.
Main Office: Phone (904) 331-9000 FAX (904) 332-4189
Canopy Park: Phone (904) 331-9000 FAX (904) 331-3368

12-19-92

O.G. Allen, Gretna Finance Mayer.
P.O. Box 10572
Tallahassee, Fl. 32302

Phone Conv.

Mr. Allen expressed concerns that Johnnie Matthews of F.R.C. was not sharing information and wanted to make sure that the equipment Mathews is proposing is state of the art and that Gretna will not get stuck with obsolete (Technology + Legislation wise) equipment. He also wanted me to comment on the financial feasibility of this project. Will it be a money maker or a bomb for the city of Gretna. I told him that I was sorry, but those questions were beyond the scope of our function. All we are here to do is to evaluate the application based on current legislation and ensure that the service does in fact comply. The rest of his concerns would have to be addressed internally among those involved in submitting the application.

He had no record of receiving a copy of the Nov 10 letter of information still needed.

Notes by: Jonathan Holton

12/8/92 O. C. Allen 942-4012
City of Gretna - Financing Officer, City of Gretna
Chairman, Gadsden Co. Commision

Is this financially feasible for the city ?
John Mathews asked to do this for the city

City of Gretna is the Owner
Florida Reduction Corp. is the operator
Texas Gulf Industries to own 70% of All issued and outstanding shares of F.R.C.

12-11 Harold Knowles: Sent him a fax of the 11/10/92 letter
↳ O.C. Allen + John Mathews do not get along well. It is very possible that O. C. A. is not being informed of current status.

↳ Gretna Signed a contract (12-10-92) for a vegetable processing + packaging plant to be constructed at the industrial park. (any problems packaging waste emissions with food products ?)

12-11-92

Phone Conv.: Jonathan Holtom to
Harold Knowles - ATTorney for Gretna

Preston asked me to contact him about Nov 10 letter

→ No, he did not receive a copy and would like one. I faxed it to him on 12-11-92

561-0397 (fax #) 222-3768 (off.)
528 E. Park Ave.
Tall., Fl. 32302

Mr. Knowles seemed to be very concerned with getting things done right. He feels that this is a great opportunity for Gretna and wants to make sure that everything is submitted according to our requests so that we have no reason to deny the permit. He is concerned that even if we approve the permit, that someone higher up with a connection to the governor, may still stop aproval.

Point of interest: City of Gretna signed a contract on 12-10-92 for a vegatable processing and packaging plant to be built in the Gretna industrial park. (Isn't this a zoning conflict?)