



Florida Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

May 2, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph R. Treshler
Vice President
Ogden Martin Systems, Inc.
P. O. Box 709
Brandon, Florida 23509-0709

RE: Lee County Solid Waste Energy Recovery Facility
PSD-FL-151

Dear Mr. Treshler:

The review of your September 17, 1993, letter requesting an administrative change to the conditions of the Prevention of Significant Deterioration permit (PSD-FL-151) issued to Lee County Utilities on July 20, 1992, for the waste to energy recovery facility has been completed. You requested that Specific Conditions 4e. of the permit be revised to authorize a higher air-to-cloth ratio for the ash handling building dust collection and ventilation system.

The basis of your request is that the 0.010 grains/dscf is achievable using a standard industrial HVAC baghouse having an air-to-cloth ratio within the range of 8:1 to 10:1.

Based on the foregoing, it is determined that the proposed revision to the Specific Conditions 4e. of PSD-FL-151 is acceptable and will not result in an increase in permitted annual emissions of any pollutant subject to the PSD regulations.

Authority to construct a stationary source was granted for the Lee County Solid Waste Energy Recovery Facility project, subject to the conditions in the permit to construct on July 20, 1992. This administrative change to PSD-FL-151 does not alter the commence construction deadline for this facility. This authority to construct is based solely on the requirements of 40 CFR 52.21, the federal regulations governing significant deterioration of air quality, and in no way affects the approvals under other federal or State regulatory authorities. Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application, may subject Lee County Solid Waste Energy Recovery Facility project to an enforcement action.

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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 applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. 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;
- (g) A statement of the relief sought by petitioner, stating precisely the action the 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 amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/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 amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed

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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.

A copy of this letter shall be attached to the above mentioned permit and shall become a part of this permit.

Sincerely,



Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/TH/bjb

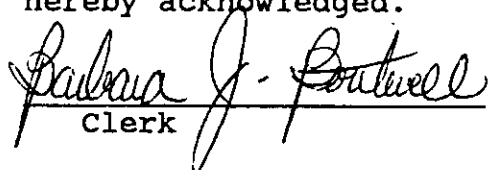
cc: David Knowles, SD
Buck Oven
Richard Donelan

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on 5/5/94 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.

 5/5/94
Clerk Date

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
 Complete items 1 and 2 for address and return address.
 Complete items 3 and 4, if applicable.
 Print your name and address on the reverse of this form so that we can return the card to you.
 Attach this form to the front of the mailpiece.
 Does not permit.
 Write Return Receipt Requested on the mailpiece below the article number.
 The Return Receipt will show to whom the article was delivered and the date delivered.

RECEIVED:
 Also wish to receive the following services (for an extra fee):
 Addressee's Address
 Restricted Delivery
 Consult postmaster for fee

3 Article Addressed to: Mr. Joseph R. Treshler
 Vice President
 Ogdan Martin Systems, Inc.
 350 N. Falkenburg Drive
 Tampa, Florida 33619

4 Article Number: P 872 563 615

5 Signature (Addressee)
Joseph R. Treshler

6 Signature (Agent)
Joseph R. Treshler

7 Date of Delivery: 5/16

8 Addressee's Address (Only if requested and fee is paid)

9 Registered
 Certified
 Express Mail
 Insured
 COD
 Return Receipt for Merchandise

PS Form 3811, December 1991 U.S. GPO: 1993-323-002 DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service

*Re Mailer
 5/11/94
 note address
 blank*

P 872 563 619



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. Joseph R. Treshler	
Street and No. P. O. Box 709	
P.O. State and ZIP Code Brandon, Florida 23509-0709	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 5/5/94 PSD-FL-151	

PS Form 3800, JUNE 1991

P 872 563 615



Receipt for Certified Mail

No Insurance Coverage Provided
 Do not use for International Mail
 (See Reverse)

Sent to Mr. Joseph R. Treshler	
Street and No. 350 N. Falkenburg Drive	
P.O. State and ZIP Code Tampa, Florida 33619	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 5/11/94 PSD-FL-151	

PS Form 3800, JUNE 1991

The Specific Conditions of federal permit PSD-FL-151 shall be modified as follows:

Specific Condition No. 4e

FROM:

4.e Baghouse Operations

All baghouses (except for lime silo dust collector) shall be equipped with pressure drop monitoring equipment. Baghouses shall have a maximum air to cloth ratio of 4:1. Extra bags shall be maintained at the site for emergency purposes.

TO:

4.e Baghouse Operations

All baghouses (except for lime silo dust collector) shall be equipped with pressure drop monitoring equipment. Extra bags shall be maintained at the site for emergency purposes. Baghouse (combustion units) shall have a maximum to cloth ratio of 4:1. Baghouse (ash handling building dust collection system) shall have a maximum air-to-cloth ratio of 10:1.

LEE COUNTY SOLID WASTE RESOURCE RECOVERY FACILITY

EMISSIONS FROM STORAGE SILOS FOR WATER TREATMENT SYSTEM

Carbon Silo:

Delivery Quantity	24 tons
Delivery Frequency	10 per year
Unloading Duration	240 minutes/delivery
Flow Rate During Unloading	700 acfm
Annual Emissions	5 pounds per year

Lime Silo:

Delivery Quantity	18 tons
Delivery Frequency	13 per year
Unloading Duration	240 minutes/delivery
Flow Rate During Unloading	700 acfm
Annual Emissions	7 pounds per year

Soda Ash Silo:

Delivery Quantity	25 tons
Delivery Frequency	19 per year
Unloading Duration	240 minutes/delivery
Flow Rate During Unloading	700 acfm
Annual Emissions	10 pounds per year

— EXHIBIT D —

EXHIBIT E

LEE COUNTY'S PROPOSED MODIFICATIONS TO THE
CONDITIONS OF CERTIFICATION¹

Proposed Modification No. 1

Condition of Certification XV.C.2.d. should state: "20.5
21.4 Feet NGVD.

Proposed Modification No. 2

Specific Condition XV.B.2.c. should state: "A maximum of 6 -
8" x 150' wells cased to 80' withdrawing from the Sandstone
aquifer with a total combined pumping capacity of 175 1,000 gpm
per well."

Proposed Modification No. 3

Condition of Certification XIV.A.3.e. should state: ". . .
Baghouses for the facility's combustion units shall have a
maximum air-to-cloth ratio of 4:1. The baghouse for the ash
handling building's dust collection system shall a maximum air-
to-cloth ratio of 10:1.

Proposed Modification No. 4

Condition of Certification XIV.A.3.e. should state: "All
baghouses (except for the lime solo dust collector and the
baghouses for the silos containing hydrated lime, soda ash, and
activated charcoal for the facility's water treatment system)
shall be equipped with pressure drop monitoring equipment.


Proposed Modification No. 5

Condition of Certification XIV.A.3.a. should state: "During
start-up procedures, propane gas shall be used to preheat the

¹ Language to be added to the existing text of the
Conditions of Certification is underscored. Language to be
deleted from the existing text of the Conditions of Certification
is ~~struck through~~.

combustion zone to achieve a minimum furnace roof temperature of ~~1270°~~F and a minimum temperature of 1800° F above the grate (at a height to be specified by the vendor) prior to ignition of MSW. The appropriate minimum furnace roof temperature shall be established by the Department, based on the test data collected during the facility's initial start-up operations, and shall be correlated to the minimum temperature of 1800 F. above the grate.

During all shut-down procedures, propane gas shall be used to ensure that the temperature above the grate, as specified above, does not drop below 1800° F and the furnace roof temperature is maintained above ~~1270°~~ F the minimum furnace roof temperature, as specified above, while any MSW is still burning.

TO: Howard L. Rhodes
FROM: Clair H. Fancy 
DATE: May 2, 1994
SUBJECT: Amendment of Permit No. PSD-FL-151

Ogden Martin Systems, Inc. has requested that the referenced permit for the Lee County Solid Waste Energy Recovery Project be amended to authorize a higher air-to-cloth ratio for the ash handling building dust collection and ventilation system. The amendment will not allow an increase in permitted annual emissions of any air pollutant.

The Bureau finds their proposal acceptable and has drafted the enclosed amendment to permit No. PSD-FL-151. Because this facility is subject to Florida's Power Plant Certification regulations, we originally requested EPA's review and approval of the enclosed draft amendment.

CHF/TH/bjb

Enclosure