

Lee County W-to E

4-1-92

Clair Fancy	FD/R/BAK	904 488 1344
Richard Donelan	DER/OGC	(904) 488-9730
Dany Cur	O.M.S.	201 882-7248
J.R. Freshner	Opden Martin	813-684-5688
Donald F. Elias	RTP ENV. Assoc. Inc.	(908) 968-9600
David S. Dee	Coakley, Fields, et al.	(904) 224-1585
Paul Chrostowski	Clement	703 934 3480
Buck Owen	DER Siting	(904) 487-6472
Barry Andrews	DER/BAK	(904) 488-1344

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

4APT-AEB

JAN 22 1992

RECEIVED

JAN 28 1992

Division of Air
Resources Management

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: Lee County, FL Energy Recovery Facility (PSD-FL-151)

Dear Mr. Fancy:

This is to acknowledge receipt of your Technical Evaluation and Preliminary Determination for the above referenced facility's proposed Prevention of Significant Deterioration (PSD) permit, received in our office on December 30, 1991. The proposed energy recovery facility will consist of three stoker waterwall combustion/steam generation units permitted to operate at a capacity of 660 tons per day (tpd) each, for a total facility capacity not to exceed 1980 tpd. Two units will be constructed initially, with the third unit being installed in the future. Each unit is capable of generating approximately 15 megawatts (MW) net.

Your determination proposes the use of a dry lime scrubber followed by a fabric filter (baghouse) for the control of particulates, acid gases and metals. NO_x emissions will be controlled by the selective noncatalytic reduction (SNCR) process. To limit emissions of dioxins/furans, your determination proposes the use of proper combustion practices. Mercury emissions will be controlled by injecting activated carbon, sodium sulfide, or a combination of both, into the flue gas prior to the dry scrubber and baghouse and through a battery collection program. Furthermore, Lee County has agreed to a biomonitoring program to evaluate the mercury content of fish and oysters in the vicinity of the proposed facility.

We have reviewed the package as submitted and are recommending the following changes to the Conditions of Certification (reference pages 8 and 9). These changes should alleviate any compliance/enforcement questions concerning emissions standards and are as follows:

- (4) SO₂: 30 ppm_v corrected to 7% O₂, 24 hour daily geometric average or at least 80% removal efficiency, whichever is least restrictive. In no case shall they exceed 0.150 lb/MMBtu per unit, 41 lbs/hr/unit, and 163.3 tons/year per unit.

This deletes the "or" in Line 4.

- (8) HCl: 25 ppm_v at 7% O₂, or at least 95% removal efficiency, whichever is least restrictive. In no case shall they exceed 0.0644 lb/MMBtu, 17.7 lbs/hr/unit, and 70.7 tons/year per unit.

This deletes the "or" in Line 3.

- (9) H₂SO₄ (sulfuric acid mist): In no case shall they exceed 0.0358 lb/MMBtu, 9.85 lbs/hr/unit and 39.3 tons/year per unit.

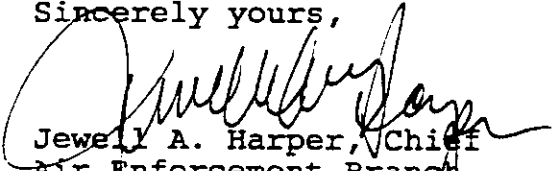
This deletes the "or" in Line 1.

- (10) *F (fluoride): 5.0 ppm_v at 7% O₂. In no case shall they exceed 0.0035 lb/MMBtu, 0.96 lbs/hr/unit and 3.8 tons/year per unit.

This deletes the "or" in Line 2.

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

Sincerely yours,


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

cc: M. Bennett
J. Rogers
D. Kinsler, A. Dist.
C. Slower, NPS
G. Hill, CFWES&C
CHF/BA/PL

NOTICE OF CERTIFICATION HEARING ON LEE COUNTY'S APPLICATION TO CONSTRUCT AND OPERATE AN ELECTRICAL POWER PLANT (RESOURCE RECOVERY FACILITY) ON A SITE TO BE LOCATED NEAR FORT MYERS, FLORIDA

On October 29, 1992 Lee County filed an application (DER File No. PA-90 30) for authorization to construct and operate an electrical power plant (resource recovery facility) near Fort Myers, in Lee County, Florida. Lee County's application now is pending before the Florida Department of Environmental Regulation and other agencies, pursuant to the Florida Resource Recovery Act, Chapter 403, Part II, Florida Statutes.

2. Lee County's proposed facility will be located on a site east of Fort Myers in central Lee County, Florida. The site is located on Buckingham Road and is approximately 2.5 miles east of the intersection of Interstate 75 and State Road 82. The facility will include a waste burn (resource recovery) incinerator facility that will burn municipal solid waste to produce electrical energy. The facility also will include steam generators, electrical generator, waste unloading facilities, and cooling tower. The facility will burn municipal solid waste at an annual rate of 1200 tons per day and will produce approximately 40 megawatts (MW) of electricity. The facility is designed so that it can be expanded in the future, if necessary, to combust 1800 tons per day and generate an ultimate use capacity of 60 MW of electricity. The project's associated linear facilities will include one 138 kV transmission line which will connect the resource recovery facility with the Florida Power and Light Company's existing Buckingham substation.

3. The application is available for public inspection and copying at the following addresses:

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

State of Florida Department of Environmental Regulation
South Florida District Office
2769 Bay Street
Fort Myers, Florida 33901-2896

Lee County Fort Myers Public Library
1050 Lee Street
Fort Myers, Florida 33901

Lee County Utilities Department
2176 McCracken Boulevard
Fort Myers, Florida 33901

4. The Department of Environmental Regulation (DER) and other agencies are evaluating the application for the proposed power plant. The report and recommendations of the Florida Department of Environmental Regulation concerning this project will be available for inspection at the locations identified in paragraph no. 3, above, on or about August 1, 1993.

5. Certification of this power plant would allow construction and operation of a new source of air pollution which would consume an increment of resource. The Department's review will result in an assessment of the prevention of significant deterioration (PSD) impacts and a determination of the best available control technology (BACT) necessary to control the emission of air pollutants from this source. The County has proposed to use good engineering practices, a dry scrubber, a filter fabric incinerator, and a selective noncatalytic reduction system as BACT. The County also will use a mercury control device to further reduce facility emissions.

6. Pursuant to Section 403.508, Florida Statutes, a certification hearing will be conducted by the Division of Administrative Hearings at the Sheraton Harbor Place, 2500 Edwards Drive, Fort Myers, Florida beginning on September 9, 1991, at 10 AM. The hearing will continue from day to day until completed. The Hearing Officer will receive comments and testimony from the parties, the public, and the affected agencies at the certification hearing. The Hearing Officer will take written or oral testimony on the merits of the proposed resource recovery plant or any other matter appropriate to the consideration of the site. Need for the facility has been predetermined by the Florida Resource Commission in a separate hearing.

The Hearing Officer will accept comments from the public beginning at 6:30 PM in the evening of Tuesday, September 10, 1991. This portion of this certification hearing also will be conducted at the Sheraton Harbor Place, 2500 Edwards Drive, Fort Myers.

8. Sections 403.508(4) and (5), Florida Statutes, provide as follows:

- (a) Parties to the proceeding shall include:
 1. the applicant;
 2. the Public Service Commission;
 3. the Department of Community Affairs;
 4. the Department of Natural Resources;
 5. the Game and Fresh Water Fish Commission;
 6. the water management district;
 7. the department;
 8. the regional planning council;
 9. the local government.

(b) Any party listed in paragraph (a) other than the department or the applicant may waive its right to participate in these proceedings. If such listed party fails to file a notice of its intent to be a party on or before the 90th day prior to the certification hearing, such party shall be deemed to have waived its right to be a party.

(c) If the listing party in paragraph (a) fails to file a notice of its intent to be a party at least 15 days prior to the date of the land use hearing, the following shall also be parties to the proceeding:

1. Any agency not listed in paragraph (a) as to matters within its jurisdiction.
2. Any domestic nonprofit corporation or association formed, in whole or in part, to promote conservation of natural beauty, to protect the environment, personal health, or other biological values; to preserve historical sites; to prevent or reduce air pollution; or to promote comprehensive planning or orderly development; or the area in which the proposed electrical power plant is to be located.
- (d) Notwithstanding paragraph (a), failure of an agency described in subparagraph (c) to file a notice of intent to be a party within the time provided herein shall constitute a waiver of the right of that agency to participate as a party in the proceeding.
- (e) Other parties may include any person, including those persons enumerated in paragraph (a) who have failed to timely file a notice of intent to be a party, whose substantial interests are affected and being determined by the proceeding and who timely file a motion to intervene pursuant to chapter 120 and applicable rules. Intervention pursuant to this paragraph may be granted at the discretion of the designated hearing officer and upon such conditions as he may prescribe any time prior to 30 days before the commencement of the certification hearing.
- (f) Any agency, including those whose properties or works are being affected pursuant to paragraph (a), shall be made a party upon the request of the department or the applicant.
- (g) When appropriate, any person may be given an opportunity to present oral or written communications to the designated hearing officer. If the designated hearing officer proposes to consider such communications, then all parties shall be given an opportunity to cross examine or challenge or rebut such communications.

9. Those wishing to intervene in these proceedings should be represented by an attorney or other person who can be determined to be qualified to appear in administrative proceedings pursuant to Chapter 120, Florida Statutes, or Chapter 17-103.020, Florida Administrative Code.

10. If any party intends to use written direct testimony of the certification hearing, the written testimony must be made available for public inspection at the locations identified in paragraph no. 3, above, at least five days before the hearing.

11. Written comments, notices or petitions filed prior to the hearing may be sent to the Hearing Officer, Ms. Diana Keeling, at the Division of Administrative Hearings, 1230 Apalachee Parkway, DeLoach Building, Tallahassee, Florida 32399. All submissions should refer to DOAH Case No. 90-3942EPF. Copies of such submissions should be forwarded by U.S. Mail to all the other parties to the proceeding, including the Department of Environmental Regulation and Lee County, for a list of parties and further information concerning the power plant siting process, contact Mr. Hamilton S. Over Jr. at the Florida Department of Environmental Regulation, 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32399-2400 or call (904) 438-2244.

12. Lee County's application for the proposed electrical power plant also is subject to U.S. Environmental Protection Agency (EPA) regulations for the Prevention of Significant Deterioration (PSD) of air quality, which are codified at 40 CFR 52.21 and Florida Administrative Code Chapter 17.2. In general, these regulations provide that a permit must be obtained from DER before construction may begin on a source of air pollution that is subject to PSD review. The permit can be issued only if the new construction has been determined by DER to comply with the requirements of the PSD regulations. These PSD regulations include a construction halt rule determined by DER to comply with the requirements of the new source. The PSD regulations also require the application of Best Available Control Technology (BACT).

13. The DER has been granted a delegation of authority from EPA for the purposes of conducting the PSD review of this and other sources. Acting pursuant to the delegation of authority, the DER will prepare a draft permit which will be included in the DER's final analysis and report. DER cannot issue the permit unless DER makes a preliminary determination that the proposed construction will comply with all applicable PSD regulations.

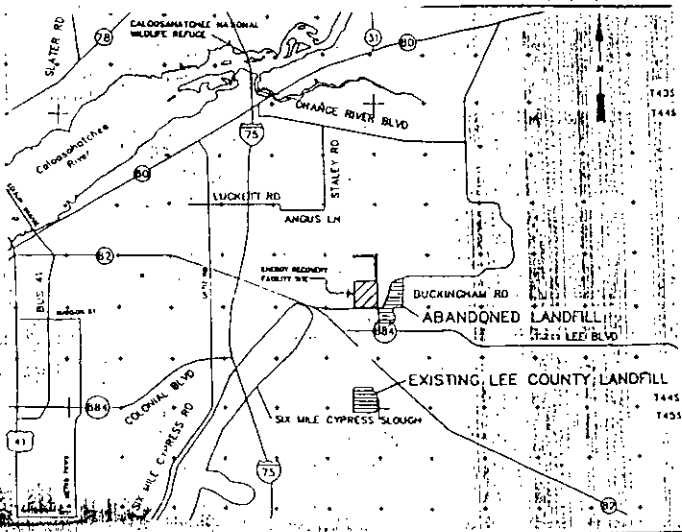
14. The County's application indicates that the proposed power plant will consume less than 3% of any applicable Class II PSD increment, as shown in the following table:

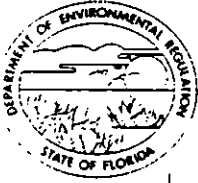
Pollutant	Averaging Period	Total Impact As a Percent of Class II Increment
Sulfur Dioxide (SO ₂)	Annual/24 hour	1.0
	3 hour	2.4
Total Suspended Particulate	Annual/24 hour	0.13
	24 hour	0.9
Methane (TSP)	Annual	0.5
Formaldehyde	24 hour	0.5
Nitrogen Dioxide (NO ₂)	Annual	0.5

The proposed facility will be located approximately 88 kilometers from the nearest Class I area (the Everglades National Park). The application indicates that the proposed facility's maximum impact on the nearest Class I area will be less than 4% of the applicable Class I increment, as shown in the following table:

Pollutant	Averaging Time	Impact as % of PSD Class I Increment
SO ₂	Annual/24 hour	0.3
	3 hour	2.4
TSP	Annual/24 hour	0.02
	24 hour	0.2
PM ₁₀	Annual/24 hour	0.02
	24 hour	0.2
NO ₂	Annual	0.5

15. Lee County's application states that the construction and operation of the proposed facility will not cause a violation of any ambient air quality standard nor will it cause an exceedance of any PSD increment and, therefore, the DER should recommend approval of this project. Persons who do not consent on this issue may do so at the certification hearing or by submitting written comments to the Hearing Officer and DER within 30 days after DER's report is received in the DER office in Fort Myers, Florida. As previously noted, the DER report and recommendations should be available for inspection at the DER office in Fort Myers and at the other locations identified in paragraph number 3, above, on or about August 1, 1991.





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: Hamilton S. Oven
THRU: Clair Fancy *CHF*
FROM: Mirza Baig *MB* *SR*
DATE: January 10, 1992
SUBJ: Lee County Resource Recovery Facility
DER Case No. PA 90-30

This is in regards to a request received on December 30, 1991, from Mr. David Dee to amend Section XIV A of the conditions of certification, specifically to increase steam production from 152,000 lbs/hour at 865 psig and 830°F to 186,197 lbs/hour at 865 psig and 830°F.

Bureau
The Department has reviewed their request (letter dated December 17, 1991) and will have no objections to an increase in steam production rate provided this change in the steam production rate simply reflects the selection of a specific boiler vendor's equipment and the improved efficiency their equipment affords, and does not reflect any changes in predicted and allowable emissions as previously submitted and approved by the Department.

Accordingly, Section XIV A of the proposed conditions of certification shall read as follows:

"Each combustor unit is designed to produce a maximum of 186,197 lbs of steam per hour at 865 psig and 830°F."

All other permit conditions of certification remain as issued.

If you have any questions, please feel free to contact me.

CHF/MB/t

cc: D. Knowles, S. District
R. Donelan, OGC

Kevin L. Erwin Consulting Ecologist, Inc. Ecologists • Biologists • Computer Scientists

RECEIVED
Division of
Resources Management
JAN 17 1992

January 8, 1992

Mr. David Ferrell
U.S. Fish & Wildlife Service
P.O. Box 2676
Vero Beach, Florida 32961-2676

Dr. Charles Facemire
U.S. Fish & Wildlife Service
4401 North Fairfax Drive, Suite 330
Arlington, Virginia 22203

Re: Lee County Resource Recovery Facility
Biomonitoring Protocol
DER File Number PA 90-30

Pursuant to the December 18, 1991 meeting between the U.S. Fish and Wildlife Service (USFWS) and representatives of Lee County in Vero Beach, Florida we are transmitting to you the requested Biomonitoring Protocol for the proposed Lee County Resource Recovery Facility. A draft copy of the protocol was sent to you last week and we received comments from Dr. Charles Facemire on January 7, 1992. We have revised the draft per the changes recommended by Dr. Facemire.

It is our understanding that the USFWS concerns about the Resource Recovery Facility would be satisfactorily addressed if Lee County conducted a biomonitoring program. The Biomonitoring Protocol outlines the biomonitoring program to evaluate the mercury content of fish and oysters in the vicinity of the proposed facility. The monitoring program would provide the USFWS with a data base to use when determining whether there may be any adverse impacts caused by the Resource Recovery Facility.

A prompt review process is very important to Lee County. Upon receipt of the enclosed Biomonitoring Protocol we hope the USFWS will take action as soon as possible so that Lee County can stay on schedule for the construction of the facility.

If there are any questions, please call me as soon as possible.

Sincerely,

KEVIN L. ERWIN CONSULTING ECOLOGIST, INC.

William R. Cox
William R. Cox
Ecologist

WRC:bb
Enclosure

- cc: David Dee, w/encl.
- Bruce Miller, w/encl.
- Don Elias, w/encl.
- George Riley, w/encl.
- Buck Oven, w/encl.
- Paul Chrostowski, w/encl.
- Lindsay Sampson, w/encl.
- John Hall, w/encl.
- Joe Treshler, w/encl.

RESOURCE RECOVERY SITE BIOMONITORING PROTOCOL

Lee County has proposed to construct a 1,200 ton-per-day waste-to-energy (WTE) facility on a site located approximately one mile east of Fort Myers, Florida. The site is near the headwaters of Six Mile Cypress Slough. The air emissions from the facility are expected to be far below any level that might result in adverse impacts on human health or the environment.

Clement International Corporation (CIC) determined that there would be no adverse ecological impacts from emissions from the facility (CIC 1991). However, during a recent meeting on December 18, 1991, in Vero Beach with the U.S. Fish and Wildlife Services (USFWS) and the permit applicant, concerns were voiced by the USFWS for certain listed wildlife species. The species of concern discussed at the meeting were the Florida panther (*Felis concolor coryi*), wood stork (*Mycteria americana*), and bald eagle (*Haliaeetus leucocephalus leucocephalus*). The USFWS stated that these species may be affected by potential mercury emissions from the facility. The basis for this statement by the USFWS is that elevated mercury concentrations have been reported in environmental media throughout Florida and mercury baseline data are lacking in the Fort Myers area.

The USFWS stated that the applicant should provide biomonitoring for mercury for both pre-and post-construction periods for indicator wildlife species. During the December 18, 1991 meeting between the USFWS, the applicant, and the applicant's consultants, it was agreed that the biomonitoring would be conducted at Six Mile Cypress Slough and Tarpon Bay at Sanibel Island. It was discussed and agreed upon at the meeting that the biomonitoring program would provide background and trend data, but would not necessarily provide "cause-effect" relationships. The proposed biomonitoring program is described below.

METHODS

Biomonitoring will be conducted by the use of indicator species such as shellfish and fin-fish. Indicator species were selected to provide baseline and trend data for mercury in the local environment. Indicator species selected are the coon oyster (*Crassostrea virginica*)¹, the largemouth bass (*Micropterus salmoides*), and the mosquitofish (*Gambusia affinis*). The coon oyster would be collected for analysis at three sampling stations at Tarpon Bay on Sanibel Island and the fin-fish would be collected at Six Mile Cypress Slough. Shellfish, such as the coon oyster, are long-lived, bottom-dwelling filter-feeders that can accumulate toxic metals, pesticides and other hazardous substances from the sediment and surrounding water even when these pollutants are present at concentrations below the levels detectable by chemical analysis of grab water samples.

¹ A positive identification of the oyster to be used for mercury tissue analysis at Sanibel Island was not made at the time of writing of this protocol. The scientific name of the oyster currently being monitored for toxic analysis by the USFWS at Sanibel Island will be confirmed prior to sample collection to maintain continuity of the USFWS biomonitoring program.

For fin-fish biomonitoring, a predator fish (largemouth bass) and an intermediate trophic level fish (mosquitofish) were selected. Predator fish represent the highest trophic level in the aquatic ecosystem and are likely to have the highest biomagnification of toxicants (i.e., mercury) which are passed up through the food chain. Analysis of indicator species will provide useful information for baseline and long-term trends in the presence of mercury in biota in local surface waters.

Shellfish and fin-fish would be sampled in March and September. The coon oyster would be sampled from three sampling stations at Tarpon Bay on Sanibel Island. Five coon oysters would be collected from each sampling location for total mercury analysis. The largemouth bass and mosquitofish would be collected from Six Mile Cypress Slough. A total of 10 bass at a minimum of 10 inches to 12 inches in length, would be collected each time. A total of 10 grams of mosquitofish will be collected per sample for a total of 10 samples per season. Consequently, a total of 35 samples would be collected each sampling period as follows:

<u>STATION</u>	<u>SEPTEMBER</u>	<u>MARCH</u>
TARPON BAY on SANIBEL ISLAND		
Refuge Manager Home	5 oysters	5 oysters
Water Control Structure #1	5 oysters	5 oysters
Water Control Structure #6	5 oysters	5 oysters
SIX MILE CYPRESS SLOUGH		
	10 largemouth bass	10 large- mouth bass
	10 mosquitofish samples (10 g. each)	10 mosquito- fish samples (10 g. each)
Total Samples Per Season	35	35

Sanibel Island (Tarpon Bay) oyster samples will be collected by wildlife refuge personnel. Oyster samples will be manually collected at low tide and placed in a labeled ziplock bag and placed on ice in the field. These collected samples will be immediately taken to the laboratory, shucked, and frozen. After shucking the oyster, samples should be placed in ziplock bags or glass jars and double labeled. A label should be placed on the outside and inside of the bags or jars. Six Mile Cypress Slough fin-fish will be collected by Lee County personnel. Fin-fish samples will be collected by electrofishing or some other suitable collecting method for largemouth bass and by dip netting for mosquitofish. Fin-fish samples will be placed on ice following collection. These collected samples will be immediately returned to the laboratory and either placed in 1-gallon ziplock bags or double wrapped in aluminum foil with the shiny side of the foil facing outward. The samples will be double labeled. One label will be placed inside of the plastic bag or aluminum foil wrapping and one label will be placed on the outside of the plastic bag or aluminum foil.

The samples will be immediately frozen and shipped in an ice chest with dry ice to the USFWS office in Vero Beach, Florida. The samples will be sent with a chain of custody form. The USFWS will ship the samples from Vero Beach to the Patuxant Analytical Control Facility for total mercury laboratory analysis. Total mercury will be measured at a detection limit of 0.05 ppm or less using a method which requires digestion either by microwave in a sealed container, or by reflux using water condensers. After digestion by one of these methods, analysis will be performed by cold vapor atomic absorption.

Pre-construction sampling will be initiated within 6 months after the County commences construction of the facility and will be conducted each September and March until the facility starts operation. Post-construction monitoring and analysis will be conducted twice each year (September and March) for up to five years. Thereafter, the County and USFWS will evaluate the data and determine whether the biomonitoring should be reduced or eliminated.

DATA ANALYSIS AND REPORTING

The USFWS will conduct the laboratory analysis for total mercury at approximately fifty dollars (\$50.00) per sample. Lee County will pay for all shipping costs associated with sample collection and analysis. The Lee County Solid Waste Division will promptly reimburse the USFWS for the cost of the laboratory analysis upon receipt of an appropriate billing statement from the USFWS. The USFWS will prepare any appropriate data summary or analysis and will provide such data each year to Lee County Solid Waste Division. Data will be placed in the STORET data base for public access. Data will be transformed (\log_{10} transformation) prior to analysis (Facemire 1991).

REFERENCES

Clement International Corporation (CIC). 1991. Lee County Board of County Commissioners, Ecological Assessment For The Proposed Lee County Waste-To-Energy Facility. December, 1991.


Facemire, C.F. 1991. Toxicologist, Environmental Contaminants Division, U.S. Fish and Wildlife Service, Arlington, Virginia. Telephone Communication. December 23, 1991.

OGDEN MARTIN SYSTEMS, INC.

P.O. BOX 0709
BRANDON, FL 33509-0709

JOSEPH R. TRESHLER
GENERAL MANAGER
MARKETING AND OPERATIONS
SOUTHEASTERN UNITED STATES
(813) 684-5688
FAX (813) 684-7964

*Patty
for file and
distribute, if
this has not been
done*



AN OGDEN PROJECTS
COMPANY

RECEIVED
JAN 9 1992
Division of Air
Resources Management

*Prater
1/10/92*

January 3, 1992

Mr. Preston Lewis
Central Air Permitting
Bureau of Air Quality Management
Florida DER
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee FL 32301

**Re: Lee County Resource Recovery Facility
DER Case No. PA90-13**

Dear Mr. Lewis,

As a follow-up to our conversation of January 2, 1992, I am writing to confirm to you our intention to select Lancaster Distral as our boiler equipment vendor for the Lee County Project. For your convenience, I have attached a copy of my letter sent December 17, 1991 to David Dee, Esq. (Permitting Attorney for Lee County Florida) notifying him of specific information regarding our intended boiler equipment vendor.

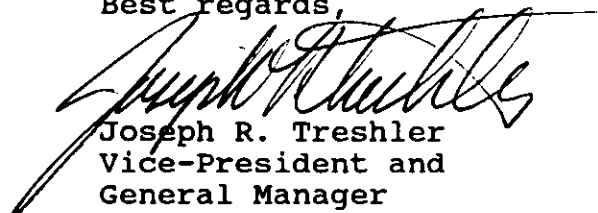
Ogden Martin Systems, Inc. competitively bids the supply of boiler equipment for each Resource Recovery Facility (RRF) project on an individual project basis. Once proposals are received from pre-qualified boiler equipment vendors, the performance characteristics of each vendors equipment is evaluated and compared to the other vendor proposals received. Compliance with the primary technical and environmental requirements established within the equipment specifications are verified and individual differences within a vendor's proposal which directly effects the performance efficiency of their equipment are noted. For our initial submittal to the client on a given project, we take the most conservative approach and utilize the most conservative steam production guarantee supplied to us of all proposals received in compliance with the balance of all technical specifications for the boiler equipment. We do this because we do not award a contract for boiler equipment at the point in time when we are submitting a proposal for an RRF project.

Mr. P. Lewis
January 2, 1992
Page 2

Once awarded an RRF project, we base our selection and award of the boiler equipment contract on a comprehensive review of all aspects of the vendor's proposal, including equipment efficiency, price, contractual terms, past performance on similar projects, etc., to arrive at the best overall equipment selection capable of meeting all technical and environmental requirements of the project.

I hope this further explanation answers your question on our notification to Mr. Dee. Please feel free to contact me at any time with any further information requests.

Best regards,



Joseph R. Treshler
Vice-President and
General Manager

JRT/ejs
Attachment

cc: G. Crane
D. Dee
J. Kowal
D. Owen
L. Montresor
P. Young

lewis.ltr

OGDEN MARTIN SYSTEMS, INC.

P.O. BOX 0709
BRANDON, FL 33509-0709

JOSEPH R. TRESHLER
GENERAL MANAGER
MARKETING AND OPERATIONS
SOUTHEASTERN UNITED STATES
(813) 684-5688
FAX (813) 684-7904



OGDEN PROJECTS
COMPANY

December 17, 1991

David Dee, Esquire
Carlton Fields
PO Drawer 190
Tallahassee, Florida 32302

Re: Lee County Resource Recovery Facility
DER Case No. PA 90 - 13

Dear Mr. Dee:

Ogden Martin Systems, Inc. is pleased to advise you that we have completed our evaluation of potential boiler vendors for the Lee County Solid Waste Resource Recovery Facility Project. We wish to notify you of more specific information regarding one of the proposed Conditions of Certification for this Project. Section XIV.A of the Conditions provides that:

"Each combustor unit is designed to produce a maximum of 152,000 lbs of steam per hour at 865 psig and 830° F."

Based on our final negotiations with the various boiler vendors and our ultimate selection of the best qualified firm, the vendor has advised us that he will guarantee a steam production rate of 169,270 lbs per hour at 100% of the Maximum Continuous Rating (MCR) for each combustion (combustor) unit. At 110% of MCR, the guaranteed steam production rate for each unit would be 186,197 lbs/hr. Accordingly, we request that Section XIV.A be revised to reflect 186,197 lbs of steam/hr per combustion unit rather than 152,000 lbs per hour. This change in the steam production rate simply reflects the selection of a specific boiler vendor's equipment and the improved efficiency their equipment affords. Specific establishment of this guaranteed steam production rate does not reflect any change in any predicted emissions from the Facility so long as the individual combustion units are operated within the 110% MCR value stated herein.

David Dee
December 17, 1991
Page 2

Thank you for your help in resolving this issue. Please advise me of any questions you may have regarding this subject.

Best regards,

Joseph R. Treshler (es)

Joseph R. Treshler
Vice-President and
General Manager

JRT/ejs

jrt91138

OGDEN MARTIN SYSTEMS
OF HILLSBOROUGH, INC.

P.O. BOX 709
BRANDON, FLORIDA 33509-0709
(813) 684-5688
FAX NO: 813-684-7964



To: Mr. Guston Lewis LOCATION: FDER - Bureau of Air Quality Mgmt.
Telecopy Number: 904-922-6979
From: JRTresler / E Staff
Date: 1/3/92 Time: 5:00 pm
Pages to Follow: 4

Message:

IN THE EVENT OF INCOMPLETE RECEIPT,
PLEASE CONTACT _____ AT _____

TRANSMISSION REPORT

THIS DOCUMENT (REDUCED SAMPLE ABOVE)
WAS SENT

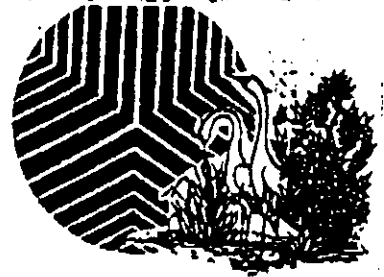
** COUNT **
5

*** SEND ***

NO	REMOTE STATION I. D.	START TIME	DURATION	#PAGES	COMMENT
1	DIV OF AIR RES MGMT	1- 3-92 4:53PM	3:07"	5	

TOTAL 0:03:07" 5

BRANDEN MARTIN SYSTEMS OF HILLSBOROUGH, INC.



P.O. BOX 709
BRANDON, FLORIDA 33508-0709
(813) 684-5622
FAX NO: 813-684-7964

To: Mr. Guston Lewis LOCATION: FDER - Bureau of Air Quality Mgmt.

Telecop Number: 904-922-6979

From: JR Traskler / E Stoff

Date: 1/3/92 Time: 5:00 pm

Pages to Follow: 4

Message:

Note: I have made a copy of this letter for my file. muza

IN THE EVENT OF INCOMPLETE RECEIPT,

PLEASE CONTACT _____ AT