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DIVISION OF AIR
RESOURCE MANAGEMENT

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Tel 941 337 2200
Fax 941 337 2510

August 12, 2003

Mr. Michael G. Cooke, Director
Division of Air Resource Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: **2003 Stack Test Report – Executive Summary Revisions**

Dear Mr. Cooke,

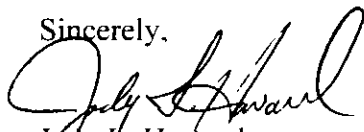
The 2003 Environmental Compliance Stack Test Report and relative accuracy test audit report for the Lee County Solid Waste Resource Recovery Facility was recently submitted to your Office on August 10, 2003. It has come to my attention the Executive Summary (COV Report No. 2916) contained an error in Table 3.3. Also, some operational information in Section 5.0 was inadvertently not included.

Attached please find a corrected copy of Table 3.3, which was revised to reflect the correct names of the Test Participants from Malcolm Pirnie and the Florida Department of Environmental Protection. In addition, revised pages that comprise Section 5.0 are attached, and include the following:

- a) 2003 Compliance Stack Test Parameters;
- b) 2003 Maximum Demonstrated Unit Load, EPA Method 23 Compliance Stack Test Parameters;
- c) 2003 Maximum Demonstrated Particulate Matter Control Device Inlet Temperature, EPA Method 23 Compliance Stack Test Parameters;
- d) 2003 Estimated Carbon Mass Feed Rate (Unit #1); and
- e) 2003 Estimated Carbon Mass Feed Rate (Unit #2).

Some of these pages in Section 5.0 did not print and were not included in the original Executive Summary. Please replace the original Section 5.0 with the pages that are attached. I apologize for this inconvenience. If you have any questions, please feel free to contact me. I can be reached at (239) 337-2200.

Sincerely,


Jody L. Howard
Facility Manager

cc: R. Blackburn, FDEP-SD (w/Encl. – 2 copies)
L. Sampson, LC-SWMD (w/Encl.)
D. Adgate, Covanta (w/o Encl)
B. Macionski, Covanta (w/Encl.)
File

TABLE 3.3

TEST PARTICIPANTS

Covanta Projects, Inc.

Daryll Fickling

Covanta Lee, Inc.

Becky Macionski

Malcolm Pirnie

Sherman Patton

Florida Department of Environmental Protection

Earl F. Baker

TESTAR, Inc.

Gary Williams, PE

Jeff Coppedge

Bill Harris

Sean Daley

Tom McDonald

Chris Harker

2003

Compliance Stack Test Parameters

	Steam Flow <i>klbs/hour</i> <i>(4-hr block avg.)</i>	B/H Inlet Temp <i>deg. Fahrenheit</i> <i>(4-hr block avg.)</i>	Carbon Injection Rate ⁽¹⁾ <i>lbs/hour</i> <i>(equal or exceed established rate)</i>
Unit #1	180	317	33.4
Unit #2	180	317	33.4

(1) In accordance with EPA Federal Implementation plan guidance, the activated carbon injection rate is established based on a total amount of carbon injected during an eight hour period.

2003

Maximum Demonstrated Unit Load EPA Method 23 Compliance Stack Test Parameters

Unit #1*	Date	Time	1 min Avg.	Unit #2	Date	Time	1 min Avg.
<u>Unit #2 - Run 1</u>	06/25/03	0901-1311	163	<u>Run 1</u>	06/25/03	0901-1311	163
		<i>Avg. Rate During Test Period</i>	163			<i>Avg. Rate During Test Period</i>	163
<u>Unit #2 - Run 2</u>	06/25/03	1338-1823	163	<u>Run 2</u>	06/25/03	1338-1823	163
		<i>Avg. Rate During Test Period</i>	163			<i>Avg. Rate During Test Period</i>	163
<u>Unit #2 - Run 3</u>	06/26/03	1142-1642	163	<u>Run 3</u>	06/26/03	1142-1642	163
		<i>Avg. Rate During Test Period</i>	163			<i>Avg. Rate During Test Period</i>	163
<u>Permitted Limit - 110% of the HFHBA is the Maximum Unit Load</u>			180	<u>Permitted Limit - 110% of the HFHBA is the Maximum Unit Load</u>			180
<i>(HFHBA- Highest Four Hour Block Average)</i>			kilo pounds/ hour	<i>(HFHBA- Highest Four Hour Block Average)</i>			kilo pounds/ hour

*In accordance with 40 CFR 60.38(b) the facility continued the alternative test schedule for Dioxin/Furan in the 2003 compliance year. Unit #2 was tested, and the Unit #2 test conditions will apply as the operating limits for Unit #1.

2003

Maximum Demonstrated Particulate Matter Control Device Inlet Temperature EPA Method 23 Compliance Stack Test Parameters

Unit #1*	Date	Time	1 min Avg.	Unit #2	Date	Time	1 min Avg.
<u>Unit #2 - Run 1</u>	06/25/03	0901-1311	282	<u>Run 1</u>	06/25/03	0901-1311	282
		<i>Avg. Rate During Test Period</i>	282			<i>Avg. Rate During Test Period</i>	282
<u>Unit #2 - Run 2</u>	06/25/03	1338-1823	283	<u>Run 2</u>	06/25/03	1338-1823	283
		<i>Avg. Rate During Test Period</i>	283			<i>Avg. Rate During Test Period</i>	283
<u>Unit #2 - Run 3</u>	06/26/03	1142-1642	287	<u>Run 3</u>	06/26/03	1142-1642	287
		<i>Avg. Rate During Test Period</i>	287			<i>Avg. Rate During Test Period</i>	287

Permitted Limit - 30 degrees Fahrenheit above the HFHBA is the Max. FF Inlet Temp.
 (HFHBA- Highest Four Hour Block Average) 317
 degrees Fahrenheit

Permitted Limit - 30 degrees Fahrenheit above the HFHBA is the Max. FF Inlet Temp.
 (HFHBA- Highest Four Hour Block Average) 317
 degrees Fahrenheit

*In accordance with 40 CFR 60.38(b) the facility continued the alternative test schedule for Dioxin/Furan in the 2003 compliance year. Unit #2 was tested, and the Unit #2 test conditions will apply as the operating limits for Unit #1.

2003

Estimated Carbon Mass Feed Rate

EPA Method 29

Unit #1	Date	Time	Hour Avg.
<u>Run 1</u>	06/26/03	0820-1039	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Run 2</u>	06/26/03	1135-1358	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Run 3</u>	06/26/03	1427-1646	33.4
<i>Avg. Rate During Test Period</i>			33.4

EPA Method 23

Unit #1*	Date	Time	1 min Avg.
<u>Unit #2 - Run 1</u>	06/25/03	0901-1311	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Unit #2 - Run 2</u>	06/25/03	1338-1823	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Unit #2 - Run 3</u>	06/26/03	1142-1642	33.4
<i>Avg. Rate During Test Period</i>			33.4

Permitted Limit - operating parameters that are primary indicators of the feed rate must equal the levels documented 33.4
pounds/hour

Permitted Limit - operating parameters that are primary indicators of the feed rate must equal the levels documented 33.4
pounds/hour

*In accordance with 40 CFR 60.38(b) the facility continued the alternative test schedule for Dioxin/Furan in the 2003 compliance year. Unit #2 was tested, and the Unit #2 test conditions will apply as the operating limits for Unit #1.

2003

Estimated Carbon Mass Feed Rate

EPA Method 29

Unit #2	Date	Time	1 Min Avg.
<u>Run 1</u>	06/25/03	0900-1125	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Run 2</u>	06/25/03	1216-1442	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Run 3</u>	06/25/03	1510-1734	33.4
<i>Avg. Rate During Test Period</i>			33.4

Permitted Limit - operating parameters that are primary indicators of the feed rate must equal the levels documented 33.4
pounds/hour

EPA Method 23

Unit #2	Date	Time	1 Min Avg.
<u>Run 1</u>	06/25/03	0901-1311	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Run 2</u>	06/25/03	1338-1823	33.4
<i>Avg. Rate During Test Period</i>			33.4
<u>Run 3</u>	06/26/03	1142-1642	33.4
<i>Avg. Rate During Test Period</i>			33.4

Permitted Limit - operating parameters that are primary indicators of the feed rate must equal the levels documented 33.4
pounds/hour