



LEE COUNTY
SOUTHWEST FLORIDA

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March 18, 2008

Mr. Scott Sheplack
Department of Environmental Protection
Bureau of Air Regulations
2600 Blair Stone Rd., MS #5505
Tallahassee, FL 32399-2400

**Subject: Lee County Waste To Energy Plant, Waste Tire Combustion Test
PSD Permit No. FL-PSD-151-D**

Dear Mr. Sheplack:

On March 7, 2008, the Lee County WTE facility performed a one-hour test burn combusting municipal solid waste and waste tires in (the new) Combustion Unit No. 3. This test was performed in accordance with Section III, Specific Condition B.24 of the subject permit in order to demonstrate the unit's ability to meet the appropriate emission requirements while burning a 5% (by weight) load of waste tires. Mr. Wayne Lewis, with the DEP's South District Office witnessed the additions of the waste tires to the feed chute during the test period and was provided a copy of the CEM data at that time.

The results provided by the CEM data indicate that all related emissions (i.e. SO₂, Opacity, CO, and NO_x) were all within normal range and that there were no emission exceedences during the test period. Lee County hereby confirms that it has met the requirements of Specific Condition B.24 and that it is now permitted to combust up to 5% by weight of waste tires in all three combustion units at its WTE facility. (Note: combustion tests previously performed for Units 1 and 2.) Record-keeping will also be maintained in accordance with the referenced permit condition.

Attached to this letter please find the following documents:

- 1) Information indicating the number and weight of tires burned and the waste tire feed-rate.
- 2) Summary information indicating the weight of the solid waste burned.
- 3) Copy of crane weight print-out from the charging crane load cells.
- 4) CEM data from the period 09:00 to 11:00 during and after the test period.
- 5) CEM Data Calibration Summary recorded prior to the test period.

RECEIVED

MAR 27 2008

BUREAU OF AIR REGULATION

Mr. Scott Sheplack
March 18, 2008
Page 2 of 2

Lee County appreciates that DEP's representative, Mr. Wayne Lewis, was able to review the performance of this test as requested. Please give me a call at 239-338-3302 if you have any questions.

Sincerely,



Lindsey J. Sampson, Director
Solid Waste Division

w/ Attachments

cc: Mr. Ajaya Satyal, DEP South District
Mr. Wayne Lewis, " "
Mr. George Ball-llovera, Covanta Lee
Ms. Becky Maconski, Covanta Lee
Mr. Kirk Dunbar, HDR
II E 105

Lee County Solid Waste Resource Recovery Facility
MWC UNIT #3 Waste Tire Combustion Allowance - TEST BURN

DATE: 3/7/2009/8

START TIME: 0910 hours

Weight of Tires: 100 Tires equivalent to 2000 lbs

GENERAL INFO

2.2	<i>Tires per Minute</i>
20.0	<i>lbs per Tire</i>

Time Interval <i>(minutes)</i>	Tires <i>(Number, #)</i>	Weight of Tires <i>(lbs)</i>	Recorded <i>(Number of Tires)</i>
10	22	433	22
20	22	433	22
30	22	433	22
40	22	433	22
50	22	433	22
60	22	433	22
# Tires Fed in 1-hour	130	2600	132

END TIME: 1009 hours

	Pounds	Tons
Weight of Tires processed in 1-hour	2600	1.3
Weight of Refuse processed in 1-hour	46150	23.075
PERCENTAGE OF TIRES (%)	5.63	5.63

DATE 3/7/2008

<u>Time</u>	<u>Unit # 3</u>	
0910	5700	
0921	7600	
0927	7250	
0932	9050	
0946	8100	
0958	8450	
Total	46,150	<u>lbs</u>
Total	23.075	<u>Tons</u>

09:14 03/07/08
ID 001727
CH 2 AD G+07400 1b

09:17 03/07/08
ID 001727
CH 1 AD G+09100 1b

09:21 03/07/08
ID 001727
CH 3 AD G+07600 1b

09:23 03/07/08
ID 001727
CH 1 AD G+07150 1b

09:27 03/07/08
ID 001727
CH 3 AD G+07250 1b

09:29 03/07/08
ID 001727
CH 2 AD G+07050 1b

09:32 03/07/08
ID 001727
CH 3 AD G+09050 1b

09:35 03/07/08
ID 001727
CH 1 AD G+07200 1b

09:39 03/07/08
ID 001727
CH 2 AD G+08800 1b

09:46 03/07/08
ID 001727
CH 3 AD G+08100 1b

09:49 03/07/08
ID 001727
CH 2 AD G+07700 1b

09:52 03/07/08
ID 001727
CH 1 AD G+05550 1b

09:56 03/07/08
ID 001727
CH 2 AD G+04000 1b

09:58 03/07/08
ID 001727
CH 3 AD G+08450 1b

10:00 03/07/08
ID 001727
HOURLY
CH 1 +00045900 1b

CH 2 +00050850 1b
CH 3 +00046150 1b

10:01 03/07/08
ID 001727
CH 2 AD G+08400 1b

10:03 03/07/08
ID 001727
CH 1 AD G+03100 1b

10:09 03/07/08
ID 001727
CH 3 AD G+08100 1b

Data Summary Report

COVANTA
ENERGY

See Unit by Solid Waste
Resource Recovery Factor

Company: Covanta Lee, Inc.
10500 Buckingham Road
Fort Myers, FL 33905

Data Group: U3_1 MIN DATA

Report Name: No Title

Start of Report: 03/07/2008 09:00

End of Report: 03/07/2008 11:00

Validation: Valid Data Only

① ② ③ ④ ⑤ ⑥ ← See Below

Group#-Channel#	G7-C9	G7-C10	G7-C11	G7-C13	G7-C14	G7-C15
Long Descrip.	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min
Short Descrip.	COsc Sel	SO2ec	SO2sc	NOXsc	Opacity	Steam Fl
Units *	ppm	ppmc	ppmc	ppmc	%	K#/Hr
Range	0-2000	0-5000	0-2000	0-2500	0-100	0-250
03/07/2008 09:00	7		0	118	0.4	160.5
03/07/2008 09:01	7		0	113	0.4	161.9
03/07/2008 09:02	7	15	0	133	0.4	167.2
03/07/2008 09:03	7	14	0	123	0.4	166.3
03/07/2008 09:04	9	15	0	128	0.4	165.5
03/07/2008 09:05	8	13	0	125	0.4	167.6
03/07/2008 09:06	6	10	0	120	0.4	168.9
03/07/2008 09:07	9	10	0	117	0.4	167.7
03/07/2008 09:08	8	10	0	110	0.4	167.2
03/07/2008 09:09	9	10	0	119	0.4	170.0
03/07/2008 09:10	9	11	0	118	0.4	172.4
03/07/2008 09:11	10	11	0	101	0.4	171.8
03/07/2008 09:12	10	10	0	133	0.4	177.1
03/07/2008 09:13	8	8	0	111	0.4	173.4
03/07/2008 09:14	9	10	0	117	0.4	172.8
03/07/2008 09:15	11	11	0	111	0.4	171.9
03/07/2008 09:16	9	9	0	108	0.5	170.4
03/07/2008 09:17	11	9	0	123	0.5	169.2
03/07/2008 09:18	14	8	0	114	0.4	162.9
03/07/2008 09:19	16	8	0	91	0.4	154.1
03/07/2008 09:20	12	7	0	102	0.4	152.0
03/07/2008 09:21	10	8	0	109	0.4	152.5
03/07/2008 09:22	13	9	0	115	0.4	152.8
03/07/2008 09:23	11	10	0	131	0.4	155.9
03/07/2008 09:24	9	9	0	134	0.4	158.3
03/07/2008 09:25	10	10	0	126	0.4	156.4
03/07/2008 09:26	13	11	0	139	0.4	157.8
03/07/2008 09:27	15	9	0	123	0.5	155.5
03/07/2008 09:28	13	9	0	118	0.4	155.4
03/07/2008 09:29	15	13	0	141	0.5	161.6
03/07/2008 09:30	21	14	0	147	0.4	162.1
03/07/2008 09:31	19	11	0	121	0.4	160.4
03/07/2008 09:32	12	11	0	133	0.4	163.9
03/07/2008 09:33	14	13	0	128	0.4	163.5
03/07/2008 09:34	16	13	0	123	0.4	164.7
03/07/2008 09:35	16	17	0	131	0.4	170.4
03/07/2008 09:36	15	13	0	133	0.4	171.7
03/07/2008 09:37	17	12	0	126	0.4	167.3
03/07/2008 09:38	18	11	0	118	0.4	164.0
03/07/2008 09:39	15	13	0	120	0.4	167.4

Group#-Channel#	G7-C9	G7-C10	G7-C11	G7-C13	G7-C14	G7-C15
Long Descrip.	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min	U-3 1Min
Short Descrip.	COsc Sel	SO2ec	SO2sc	NOXsc	Opacity	Steam Fl
Units	ppm	ppmc	ppmc	ppmc	%	K#/Hr
Range	0-2000	0-5000	0-2000	0-2500	0-100	0-250
03/07/2008 09:40	14	15	0	141	0.4	169.1
03/07/2008 09:41	18	15	0	124	0.4	163.5
03/07/2008 09:42	17	15	0	119	0.4	160.0
03/07/2008 09:43	13	14	0	125	0.4	160.0
03/07/2008 09:44	11	13	0	129	0.4	158.8
03/07/2008 09:45	14	14	0	126	0.4	156.9
03/07/2008 09:46	13	14	0	135	0.4	159.1
03/07/2008 09:47	10	15	0	137	0.4	162.5
03/07/2008 09:48	10	16	0	142	0.4	164.9
03/07/2008 09:49	12	16	0	126	0.4	165.3
03/07/2008 09:50	11	17	0	141	0.4	169.0
03/07/2008 09:51	9	15	0	124	0.4	164.0
03/07/2008 09:52	13	14	0	128	0.4	160.8
03/07/2008 09:53	19	16	0	124	0.4	160.2
03/07/2008 09:54	18	20	0	132	0.4	167.8
03/07/2008 09:55	14	21	0	142	0.4	173.8
03/07/2008 09:56	19	23	0	138	0.4	176.6
03/07/2008 09:57	23	26	0	126	0.4	177.9
03/07/2008 09:58	23	30	0	130	0.4	181.0
03/07/2008 09:59	18		0	136	0.4	180.3
03/07/2008 10:00	27		0	105	0.4	174.0
03/07/2008 10:01	34		0	93	0.4	162.9
03/07/2008 10:02	26	22	0	91	0.5	157.9
03/07/2008 10:03	24	23	0	97	0.5	155.5
03/07/2008 10:04	31	27	0	114	0.4	156.6
03/07/2008 10:05	28	32	0	117	0.4	161.5
03/07/2008 10:06	20	32	0	136	0.4	168.8
03/07/2008 10:07	22	33	0	133	0.4	169.8
03/07/2008 10:08	23	32	0	134	0.4	167.2
03/07/2008 10:09	25	34	0	134	0.4	165.8
03/07/2008 10:10	24	35	0	128	0.4	162.9
03/07/2008 10:11	29	38	0	136	0.4	162.5
03/07/2008 10:12	39	37	0	125	0.4	162.1
03/07/2008 10:13	31	34	0	141	0.5	167.4
03/07/2008 10:14	23	29	0	126	0.4	164.0
03/07/2008 10:15	31	27	0	110	0.4	159.3
03/07/2008 10:16	33	24	0	102	0.4	155.9
03/07/2008 10:17	32	27	0	103	0.4	157.1
03/07/2008 10:18	25	28	0	108	0.4	160.7
03/07/2008 10:19	26	32	0	126	0.4	167.6
03/07/2008 10:20	26	30	0	133	0.4	172.3
03/07/2008 10:21	22	28	0	132	0.4	174.2
03/07/2008 10:22	72	29	0	116	0.4	175.2
03/07/2008 10:23	109	30	0	94	0.4	179.2
03/07/2008 10:24	30	26	0	100	0.4	180.3
03/07/2008 10:25	23	24	0	105	0.5	179.9
03/07/2008 10:26	20	25	0	112	0.4	179.8
03/07/2008 10:27	21	25	0	107	0.4	175.1
03/07/2008 10:28	28	26	0	108	0.4	174.9
03/07/2008 10:29	25	27	0	99	0.4	172.3
03/07/2008 10:30	28	29	0	114	0.4	170.7

Group#-Channel#	G7-C9	G7-C10	G7-C11	G7-C13	G7-C14	G7-C15
Long Descrip.	U-3 lMin	U-3 lMin	U-3 lMin	U-3 lMin	U-3 lMin	U-3 lMin
Short Descrip.	COsc Sel	SO2ec	SO2sc	NOXsc	Opacity	Steam Fl
Units	ppm	ppmc	ppmc	ppmc	%	K#/Hr
Range	0-2000	0-5000	0-2000	0-2500	0-100	0-250
03/07/2008 10:31	28	28	0	109	0.4	168.0
03/07/2008 10:32	24	27	0	112	0.4	165.3
03/07/2008 10:33	24	28	0	114	0.4	164.8
03/07/2008 10:34	21	26	0	123	0.4	163.7
03/07/2008 10:35	28	27	0	114	0.4	160.1
03/07/2008 10:36	27	33	0	120	0.4	161.0
03/07/2008 10:37	25	42	0	112	0.4	165.8
03/07/2008 10:38	21	35	0	127	0.4	168.2
03/07/2008 10:39	20	32	0	112	0.4	160.6
03/07/2008 10:40	26	32	0	90	0.4	153.0
03/07/2008 10:41	32	36	0	104	0.4	153.5
03/07/2008 10:42	33	39	0	115	0.4	159.2
03/07/2008 10:43	25	39	0	124	0.4	164.9
03/07/2008 10:44	24	40	0	128	0.4	168.5
03/07/2008 10:45	19	37	0	117	0.4	162.7
03/07/2008 10:46	22	37	0	105	0.4	159.7
03/07/2008 10:47	22	37	0	117	0.4	161.4
03/07/2008 10:48	19	38	0	143	0.4	168.3
03/07/2008 10:49	14	40	0	145	0.4	172.6
03/07/2008 10:50	14	37	0	137	0.4	172.9
03/07/2008 10:51	17	37	0	109	0.4	165.5
03/07/2008 10:52	17	48	0	117	0.4	165.5
03/07/2008 10:53	16	44	0	135	0.4	166.9
03/07/2008 10:54	18	45	0	133	0.4	169.2
03/07/2008 10:55	18	44	0	137	0.4	169.8
03/07/2008 10:56	19	44	0	129	0.4	169.2
03/07/2008 10:57	21	43	0	129	0.4	167.0
03/07/2008 10:58	21	42	0	127	0.4	161.9
03/07/2008 10:59	19		0	123	0.4	163.6
03/07/2008 11:00	14		0	140	0.4	166.9
Period Average =	20	23	0	122	0.4	165.6
Period Max Value =	109	48	0	147	0.5	181.0
Period Min Value =	6	7	0	90	0.4	152.0
Period Totals =	2.3720E+3	2.6260E+3	0.0000E+0	1.4702E+4	4.9200E+1	2.0037E+4
Period % Recovery =	100.0	95.0	100.0	100.0	100.0	100.0

- ① CO AT STACK
 - ② SO₂ AT BOILER ECONOMIZER OUTLET (BEFORE SCRUBBER)
 - ③ SO₂ AT STACK
 - ④ NO_x AT STACK
 - ⑤ OPACITY AT STACK
 - ⑥ BOILER STEAM GENERATION
- * ALL CONCENTRATIONS (PPM) CORRECTED TO 7% O₂ EQUIVALENT

Daily Calibration Summary

COVANTA

10000
 10000
 10000

Company: Covanta Lee, Inc.
 10500 Buchingham Road
 Fort Myers, FL

Stack ID #: UNIT #3
 Start of Report: 03/07/08 00:00
 End of Report: 03/07/08 23:59

TYPE	PARAMETER	START	STOP	EXPECT.	ACTUAL	ERROR	% FS	STATUS
Zero	COSH 3	03/07/08 06:48	03/07/08 06:53	0.00	1.00	1.00	0.0	OK
Span		03/07/08 06:53	03/07/08 06:58	1094.0	1072.0	-22.00	-1.1	
Zero	COSL 3	03/07/08 06:48	03/07/08 06:53	0.00	0.00	0.00	0.0	OK
Span		03/07/08 06:58	03/07/08 07:03	275.00	279.30	4.30	0.8	
Zero	NH3S 3	03/07/08 06:48	03/07/08 06:53	0.00	0.00	0.00	0.0	OK
Span		03/07/08 07:03	03/07/08 07:12	55.30	62.32	7.02	3.5	
Zero	NOXS 3	03/07/08 06:48	03/07/08 06:53	0.00	-0.30	-0.30	-0.0	OK
Span		03/07/08 06:53	03/07/08 06:58	269.00	268.30	-0.70	-0.1	
Zero	O2E 3	03/07/08 06:35	03/07/08 06:40	0.00	0.10	0.10	0.4	OK
Span		03/07/08 06:45	03/07/08 06:50	13.00	12.90	-0.10	-0.4	
Zero	O2S 3	03/07/08 06:48	03/07/08 06:53	0.00	-0.10	-0.10	-0.4	OK
Span		03/07/08 06:58	03/07/08 07:03	13.00	12.80	-0.20	-0.8	
Zero	OPS 3	03/07/08 07:01	03/07/08 07:02	0.00	0.00	0.00	0.0	OK
Span		03/07/08 07:04	03/07/08 07:05	45.50	45.60	0.10	0.1	
Zero	SO2E 3	03/07/08 06:35	03/07/08 06:40	0.00	-0.20	-0.20	-0.0	OK
Span		03/07/08 06:40	03/07/08 06:45	560.00	539.10	-20.90	-2.0	
Zero	SO2S 3	03/07/08 06:48	03/07/08 06:53	0.00	-1.00	-1.00	-0.2	OK
Span		03/07/08 06:53	03/07/08 06:58	276.00	267.00	-9.00	-2.2	