



WHEELABRATOR RIDGE ENERGY INC.
A WASTE MANAGEMENT COMPANY

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October 24, 2000

Mr. A. A. Linero, P.E.
Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

OCT 30 2000

BUREAU OF AIR REGULATION

RE: **Wheelabrator Ridge Energy - Permit AC53-206244 (PSD-FL-183A)**
Permit Clarification - Permitted Wood Fuel Mix - Railroad Ties & Utility Poles

1050216-004-AC

Dear Mr. Linero:

Andrew Thuy Nguyen, Compliance Engineer with the Division of Air Resource Management with the Southwest District of the Florida Department of Environmental Protection, raised the question as to whether Wheelabrator Ridge Energy's (WRE) Ridge Generating Station was permitted to burn a small percentage of railroad ties and utility poles in its fuel mix. Mr. Nguyen requested that WRE contact you and clarify this issue. There is a difference between the PSD fuel condition and the Title V fuel condition that is causing the query.

Per your phone conversation with John Neil on October 24 it was agreed that it is the intent of the department to allow WRE to burn a small percentage of railroad ties and utility poles. This is based on the "Application for Permit to Construct Air Emission Sources (Including Prevention of Significant Deterioration Evaluation)" submitted in December 1991 where WRE defined wood fuels in section 3.2.1 as follows: "wood fuel would include construction and demolition (C & D) material, forest residuals/land clearing, industrial wood wastes, and wood chips derived from processed yard wastes". The industrial wood waste was further described to include materials from pallet companies, sawmill manufacturers of wood products, and may also include a small percentage of railroad ties and utility poles.

In order to eliminate ambiguity in the future WRE is requesting that specific condition 3 of the PSD permit and Emission Condition A.2. of the Title V permit be changed as follows:

From

Specific Condition 3 (PSD)

"Fuel for firing the RGS boiler shall consist only of wood, yard waste, landfill gas and tires. The tire feed rate shall be limited to 18,505 pounds of tires per hour, (based on a 24-hour block average). Propane may be used as a startup, shutdown, and combustion stabilization fuel and

shall not exceed an annual capacity factor of 10 percent of total heat input.”

Emissions Condition A.2. (Title V)

A.2. Methods of Operation – (i.e., Fuels)

Fuel for firing the boiler shall consist only of wood (as defined in 40 CFR 60, Subpart Db) yard waste, landfill gas, and tires. The tire firing rate shall be limited to 18,505 pounds of tires per hour, based on a 24-hour block average. Propane may be used as a startup, shutdown, and combustion stabilization fuel and shall not exceed an annual capacity factor of 10 percent of total heat input.

To

“Fuel for firing the RGS boiler shall consist only of wood, wood waste, yard waste, landfill gas and tires. Wood waste includes but is not limited to wood pallets; construction, renovation, and demolition wastes (which includes railroad ties and telephone poles). The tire feed rate shall be limited to 18,505 pounds of tires per hour, (based on a 24-hour block average). Propane may be used as a startup, shutdown, and combustion stabilization fuel and shall not exceed an annual capacity factor of 10 percent of total heat input.”

If you have any questions please contact John Neil at (863) 665-2255 (Ext. 250).

Sincerely Yours


John N Rivara
Plant Manager

cc: G. Kissel (DEP Southwest District)
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