



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

March 3, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. George D. Woodward
Plant Manager
Wheelabrator Ridge Energy, Inc.
3131 K-Ville Avenue
Auburndale, Florida 33823

RE: February 19, 1999 Request for Amended Air Construction
Permit No. AC53-206244 (PSD-FL-183A)

Dear Mr. Woodward:

This is in response to Wheelabrator Ridge Energy, Inc.'s referenced letter requesting changes to the subject construction permit. The Department will consider the requests upon receipt of the required fee of \$50 for minor amendments provided under Chapter 62-4 of the Florida Administrative Code.

Your letter provides sufficient information for processing the request. Therefore, the only additional requirement is the receipt of the fee for the permit amendment.

If there are any questions regarding the above, please contact me or John Reynolds at (850) 488-0114.

Sincerely,

A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/r

c: G. Kissel, SWD

Is your RETURN ADDRESS completed on the reverse side.

- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the envelope, or on the back if space 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.

I also wish to receive the following services (for an extra fee):

1. Addressee's Address

2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 George D. Woodward
 Wheelabrator Ridge E.
 3131 K-Ville Ave
 Auburndale, FL
 33823

4a. Article Number
 P 265 659 429

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 3-5-99

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)
 X *[Signature]*

Thank you for using Return Receipt Service.

P 265 659 429

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	
• George Woodward	
Street & Number	
Wheelabrator Ridge	
Post Office, State, & ZIP Code	
Auburndale FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	3-3-99

PS Form 3800 April 1995
 A053-266244
 P26-F1-153A



Wheelabrator Ridge Energy Inc.

A Waste Management Company
3131 K-Ville Avenue
Auburndale, FL 33823

Phone 941.665.2255
Fax 941.665.0400

RECEIVED

FEB 22 1999

**BUREAU OF
AIR REGULATION**

February 19, 1999

Mr. John Reynolds
Mail Stop 5505
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Request for Revisions to PSD Permit No.: AC 53-206244/PSD-FL-183
Ridge Generating Station, Auburndale: Facility ID No.: 1050216

Dear Mr. Reynolds:

During preparation of the facility's Title V permit application and review of the recently issued draft Title V permit, certain items were identified that, if revised, would streamline the facility's compliance with the conditions contained in the draft permit. However, since these revisions are to conditions found in the facility's existing PSD permit, the PSD permit must be revised in order for the Southwest District office to have authority to incorporate these revisions into the Title V permit.

Wheelabrator Ridge Energy Inc. is requesting that four of the conditions in the Ridge Generating Station's PSD permit be revised per the language in the enclosed table. The revisions are being requested for the following reasons, which are more fully discussed in the enclosed table.

1. Establishes averaging times for operational limitations.
2. Deletes duplicate limitations.
3. Allows the use of DEP-approved test methods that have been developed since the issuance of the permit.
4. Deletes reference to two emission points/control devices that are not required for proper operation of the facility.

Mr. John Reynolds
Florida D.E.P.
Revisions to Permit AC 53-206244/PSD-FL-183
Page 2

None of these revisions result in an increase of any permitted limitations or pollutant emissions from the facility.

Please feel free to call Mr. John Neil at 941/665-2255 (Ext. 250) if you have any questions concerning the proposed revisions.

Sincerely,



George D. Woodward, P.E.
Plant Manager

CERTIFIED MAIL: Z 075 834 277

cc: M. Killeen (WESI)
 T. Porter (WESI)
 G. Kissel (DEP Southwest District)

Company: Wheelabrator Ridge Energy Inc.
 Facility ID Number: 1050216
 Permit Issue date: February 14, 1997

Facility: Ridge Generating Station; Auburndale, Florida
 Permit Number: AC 53-206244/PSD-FL-183

Specific Condition No.	Current Language	Proposed Revised Language	Rationale for Revision																																																																		
2	The RGS facility shall be allowed to operate at a maximum capacity of 50 Megawatts (approximately equivalent to 630 MMBtu/hr) for 8,760 hours per year. [Rule 62-210.200(223), F.A.C.]	The RGS facility shall be allowed to operate at a maximum capacity of 50 Megawatts based on a 24-hour block average basis for 8,760 hours per year (50 megawatts is equivalent to approximately 630 MMBtu/hr). [Rule 62-210.200(223), F.A.C.]	Establishes an averaging time for determining compliance with this requirement making the requirement more practically enforceable. It does not change the currently permitted heat input or emission rates.																																																																		
3	Fuel for firing the RGS boiler shall consist only of wood, yard wastes, landfill gas, and up to 16.1 percent tires (percent by weight equivalent to 40 percent tires based on heat content and based on a 24-hour block average). The 16.1 percent tire weight limitation is equivalent to a tire firing rate of 18,505 pounds of tires per hour. 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. [Rule 62-210.200(223), F.A.C.]	Fuel for firing the RGS boiler shall consist only of wood, yard wastes, 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. [Rule 62-210.200(223), F.A.C.]	The lb/hr tire-firing rate and averaging time is sufficient to demonstrate compliance with this requirement. This makes the requirement more practically enforceable. The lb/hr value was calculated using the 16.1% value, therefore, both limitations are not required. It does not change the currently permitted tire firing rate or emission rates.																																																																		
5	<p>The RGS boiler exhaust gases shall not exceed the limits [Rule 62-212.400, F.A.C.]:</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>lb/hr</th> <th>Tons/yr</th> </tr> </thead> <tbody> <tr> <td>SO₂</td> <td>65.0</td> <td>284.7 (30-day rolling avg. CEMS)</td> </tr> <tr> <td>NO_x</td> <td>90.0</td> <td>394.2 (30 day rolling avg. CEMS)</td> </tr> <tr> <td>CO</td> <td>200.0</td> <td>876.0 (30 day rolling avg. CEMS)</td> </tr> <tr> <td>VOC</td> <td>22.1</td> <td>96.8 (EPA Meth. 25A if required)</td> </tr> <tr> <td>HCl</td> <td>5.0</td> <td>21.9 (EPA Meth. 26 if required)</td> </tr> <tr> <td>Hg</td> <td>0.022</td> <td>0.096 (EPA Meth. 101A if required)</td> </tr> <tr> <td>Pb</td> <td>0.25</td> <td>1.1 (EPA Meth. 12 if required)</td> </tr> <tr> <td>Be</td> <td>0.0063</td> <td>0.028 (EPA Meth. 104 if required)</td> </tr> <tr> <td>VE</td> <td colspan="2">10% opacity (EPA Meth. 9 annual)</td> </tr> <tr> <td>PM/PM₁₀</td> <td colspan="2">0.0080 gr/ SCF (corrected to 7% O₂) (EPA Meth. 5 if required).</td> </tr> </tbody> </table>	Pollutant	lb/hr	Tons/yr	SO ₂	65.0	284.7 (30-day rolling avg. CEMS)	NO _x	90.0	394.2 (30 day rolling avg. CEMS)	CO	200.0	876.0 (30 day rolling avg. CEMS)	VOC	22.1	96.8 (EPA Meth. 25A if required)	HCl	5.0	21.9 (EPA Meth. 26 if required)	Hg	0.022	0.096 (EPA Meth. 101A if required)	Pb	0.25	1.1 (EPA Meth. 12 if required)	Be	0.0063	0.028 (EPA Meth. 104 if required)	VE	10% opacity (EPA Meth. 9 annual)		PM/PM ₁₀	0.0080 gr/ SCF (corrected to 7% O ₂) (EPA Meth. 5 if required).		<p>The RGS boiler exhaust gases shall not exceed the limits [Rule 62-212.400, F.A.C.]:</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>lb/hr</th> <th>Tons/yr</th> </tr> </thead> <tbody> <tr> <td>SO₂</td> <td>65.0</td> <td>284.7 (30-day rolling avg. CEMS)</td> </tr> <tr> <td>NO_x</td> <td>90.0</td> <td>394.2 (30 day rolling avg. CEMS)</td> </tr> <tr> <td>CO</td> <td>200.0</td> <td>876.0 (30 day rolling avg. CEMS)</td> </tr> <tr> <td>VOC</td> <td>22.1</td> <td>96.8 (EPA Meth. 25A if required)</td> </tr> <tr> <td>HCl</td> <td>5.0</td> <td>21.9 [EPA Meth. 26 or Meth. 26A (modified) if required]</td> </tr> <tr> <td>Hg</td> <td>0.022</td> <td>0.096 (EPA Meth. 101A or Meth. 29 if required)</td> </tr> <tr> <td>Pb</td> <td>0.25</td> <td>1.1 [EPA Meth. 12 or Meth. 29 if required]</td> </tr> <tr> <td>Be</td> <td>0.0063</td> <td>0.028 (EPA Meth. 104 or Meth. 29 if required)</td> </tr> <tr> <td>VE</td> <td colspan="2">10% opacity (6-minute average COMS)</td> </tr> <tr> <td>PM/PM₁₀</td> <td colspan="2">0.0080 gr/ SCF (corrected to 7% O₂) [EPA Meth. 5 if required].</td> </tr> </tbody> </table>	Pollutant	lb/hr	Tons/yr	SO ₂	65.0	284.7 (30-day rolling avg. CEMS)	NO _x	90.0	394.2 (30 day rolling avg. CEMS)	CO	200.0	876.0 (30 day rolling avg. CEMS)	VOC	22.1	96.8 (EPA Meth. 25A if required)	HCl	5.0	21.9 [EPA Meth. 26 or Meth. 26A (modified) if required]	Hg	0.022	0.096 (EPA Meth. 101A or Meth. 29 if required)	Pb	0.25	1.1 [EPA Meth. 12 or Meth. 29 if required]	Be	0.0063	0.028 (EPA Meth. 104 or Meth. 29 if required)	VE	10% opacity (6-minute average COMS)		PM/PM ₁₀	0.0080 gr/ SCF (corrected to 7% O ₂) [EPA Meth. 5 if required].		<p>Allows the use of the EPA-approved methods for determining compliance using stack testing. These methods are acceptable by FDEP since they have been adopted by reference in state regulations [Rules 62-297.401, F.A.C. and 62-204.800, F.A.C.]</p> <p>The facility is required to use a continuous emission monitoring system for determining compliance with the VE limitation; therefore, an annual observation (Method 9) test is not required.</p>
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Specific Condition No.	Current Language	Proposed Revised Language	Rationale for Revision
6	Visible emissions from the ash handling area vent filter, the lime silo vent filter, and the fuel transfer building vent filter shall not exceed 10 percent opacity. [Rule 62-212.400, F.A.C.]	Visible emissions from the lime silo vent filter shall not exceed 10 percent opacity. [Rule 62-212.400, F.A.C.]	<p>The vents and filters were installed on the ash handling area and fuel transfer building to exhaust particulate matter from these work areas for employee health and safety. Operational experience has shown that the vent/filter systems are ineffective in capturing the particulate matter generated inside the buildings and that the generation of particulate matter inside the buildings is not sufficient to be an employee health and safety issue. Any particulate matter emissions from these buildings are fugitive emissions through open doors and windows.</p> <p>For these reasons, it is requested that the ash handling area vent and filter and the fuel transfer building vent and filter be deleted from the permit as emission points.</p>