



Wheelabrator Ridge Energy Inc.

3131 K-ville Avenue  
Auburndale, FL 33823  
Tel. 813-665-2255  
Fax. 813-665-0400

July 19, 1995

RECEIVED

JUL 24 1995

State of Florida  
Department of Environmental Protection  
Chief Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Bureau of  
Air Regulation

Re: Ridge Generating Station  
Air Permit #AC53-206244, PSD-FL-183

Dear Sir:

In accordance with 40 C.F.R. 60.50a(d), 60.59a(b)(14), and 60.59a(m), enclosed please find data summarizing the daily weight of MSW and other fuels fired during the Second Quarter 1995. Our percentage of MSW combusted continues to be under 30%, so we remain subject only to the record keeping and reporting requirements for co-fired combustors under the MWC NSPS, 40 C.F.R. Part 60, Subpart Ea.

If you have any questions regarding this submittal, please contact Chuck Davis at (941) 665-2255.

Sincerely,

Rodney Williams  
Plant Manager

CC: EPA Region IV  
B. Proses, DEP S.W. District

Certification # P 013 080 057

# WHEELABRATOR RIDGE ENERGY

## APRIL '95 STATS

19-Jul

		MSW PROCESSED		TOTAL MSW	OTHER FUELS PROCESSED		TOTAL PROCESSED
		YARDWASTE TONS	TIRES TONS	PROCESSED TONS	WOOD TONS	PROPANE TONS	TONS
1st Qtr		7495.85	7181.40	14677.25	79575.84	344.30	94597.39
SUN							
MON							
TUE							
WED							
THU							
FRI							
SAT	1	62.26	103.12	165.38	937.15	4.43	1106.96
SUN	2	0.00	0.00	0.00	0.00	5.06	5.06
MON	3	0.00	0.00	0.00	0.00	0.00	0.00
TUE	4	0.00	0.00	0.00	0.00	0.00	0.00
WED	5	0.00	0.00	0.00	0.00	0.00	0.00
THU	6	0.00	0.00	0.00	0.00	0.00	0.00
FRI	7	0.00	0.00	0.00	0.00	0.00	0.00
SAT	8	0.00	0.00	0.00	0.00	0.00	0.00
SUN	9	5.50	17.70	23.20	88.34	21.52	133.06
MON	10	50.39	73.90	124.29	809.28	4.20	937.77
TUE	11	48.10	82.24	130.34	772.47	1.90	904.71
WED	12	54.67	107.55	162.22	878.01	0.63	1040.86
THU	13	33.35	47.14	80.49	535.62	12.66	628.77
FRI	14	67.11	90.33	157.44	1077.74	0.63	1235.81
SAT	15	62.69	84.49	147.18	1006.67	0.00	1153.85
SUN	16	61.28	103.78	165.06	857.88	0.00	1022.94
MON	17	64.87	99.19	164.06	908.20	0.00	1072.26
TUE	18	70.77	123.55	194.32	990.86	0.00	1185.18
WED	19	73.38	116.52	189.90	1027.30	0.00	1217.20
THU	20	39.72	85.06	124.78	556.09	6.96	687.83
FRI	21	77.49	59.78	137.27	1084.94	2.53	1224.74
SAT	22	73.39	50.76	124.15	1027.41	1.27	1152.83
SUN	23	203.08	43.49	246.57	1105.37	0.00	1351.94
MON	24	185.81	71.01	256.82	1011.38	0.00	1268.20
TUE	25	184.44	89.23	273.67	1003.95	0.63	1278.25
WED	26	169.00	100.58	269.58	919.91	0.00	1189.49
THU	27	160.15	90.85	251.00	871.71	0.00	1122.71
FRI	28	18.22	20.77	38.99	99.20	1.27	139.46
SAT	29	0.00	0.00	0.00	0.00	15.13	15.13
SUN	30	90.35	101.75	192.10	713.48	10.13	915.71
MTD		1856.05	1762.79	3618.84	18282.93	88.96	21990.73
				16.46%	83.14%	0.40%	100.00%

		YARDWASTE TONS	TIRES TONS	TOTAL MSW PROCESSED TONS	WOOD TONS	PROPANE TONS	TOTAL PROCESSED TONS
WK	1	62.26	103.12	165.38	937.15	4.43	1106.96
WK	2	0.00	0.00	0.00	0.00	5.06	5.06
WK	3	321.83	503.35	825.18	5168.11	41.55	6034.84
WK	4	460.90	638.64	1099.54	6452.68	10.76	7562.98
WK	5	920.71	415.93	1336.64	5011.51	17.03	6365.18
WK	6	90.35	101.75	192.10	713.48	10.13	915.71
MTD		1856.05	1762.79	3618.84	18282.93	88.96	21990.73
				15.69%	83.94%	0.37%	100.00%
YTD		9351.90	8944.19	18296.09	97858.77	433.26	116588.12

# WHEELABRATOR RIDGE ENERGY

## MAY '95 STATS

19-Jul

	YARDWASTE PROCESSED TONS	MSW TIRES PROCESSED TONS	TOTAL MSW PROCESSED TONS	OTHER FUELS WOOD PROCESSED TONS	PROPANE PROCESSED TONS	TOTAL PROCESSED TONS
SUN						
MON 1	114.20	91.68	205.88	901.81	9.07	1116.76
TUE 2	111.65	93.46	205.11	881.67	4.43	1091.21
WED 3	129.08	107.71	236.79	1019.35	0.00	1256.14
THU 4	115.66	104.47	220.13	913.36	0.00	1133.49
FRI 5	104.88	86.68	191.56	828.23	0.00	1019.79
SAT 6	141.85	105.40	247.25	1120.16	0.00	1367.41
SUN 7	198.75	107.09	305.84	1044.57	0.00	1350.41
MON 8	204.00	81.59	285.59	1072.18	0.00	1357.77
TUE 9	225.61	87.95	313.56	1185.72	0.00	1499.28
WED 10	198.59	107.59	306.18	1043.73	0.00	1349.91
THU 11	199.86	102.74	302.60	1050.39	0.00	1352.99
FRI 12	65.44	38.20	103.64	343.93	6.33	453.90
SAT 13	197.70	107.47	305.17	1039.02	0.00	1344.19
SUN 14	112.54	107.36	219.90	1061.83	0.00	1281.73
MON 15	114.86	102.29	217.15	1083.74	0.00	1300.89
TUE 16	114.85	107.10	221.95	1083.67	0.00	1305.62
WED 17	111.53	106.21	217.74	1052.30	0.63	1270.67
THU 18	106.26	100.32	206.58	1002.58	0.00	1209.16
FRI 19	76.38	58.34	134.72	720.71	0.00	855.43
SAT 20	88.08	99.06	187.14	831.01	26.55	1044.70
SUN 21	200.06	93.29	293.35	1073.42	0.00	1366.77
MON 22	204.23	65.94	270.17	1095.79	0.00	1365.96
TUE 23	251.41	28.88	280.29	1348.96	0.00	1629.25
WED 24	229.02	93.54	322.56	1228.81	0.00	1551.37
THU 25	154.74	96.72	251.46	830.23	5.06	1086.75
FRI 26	179.69	101.87	281.56	964.11	1.27	1246.94
SAT 27	177.48	90.51	267.99	952.28	0.00	1220.27
SUN 28	139.46	91.80	231.26	888.08	0.00	1119.34
MON 29	138.16	106.36	244.52	879.78	10.13	1134.43
TUE 30	112.74	85.85	198.59	717.90	12.90	929.39
WED 31	89.97	62.72	152.69	572.91	10.13	735.73
THU						
FRI						
SAT						

MTD	4608.72	2820.19	7428.91	29832.24	86.51	37347.66
			19.89%	79.88%	0.23%	100.00%

	YARDWASTE PROCESSED TONS	TIRES PROCESSED TONS	TOTAL MSW PROCESSED TONS	OTHER FUELS WOOD PROCESSED TONS	PROPANE PROCESSED TONS	TOTAL PROCESSED TONS
WK 1	717.32	589.40	1306.72	5664.58	13.50	6984.80
WK 2	1289.95	632.63	1922.58	6779.54	6.33	8708.45
WK 3	724.50	680.68	1405.18	6835.84	27.19	8268.21
WK 4	1396.62	570.75	1967.37	7493.61	6.33	9467.31
WK 5	480.34	346.73	827.07	3058.66	33.16	3918.89
MTD	4608.72	2820.19	7428.91	29832.24	86.51	37347.66
			16.71%	82.95%	0.34%	100.00%
YTD	13960.62	11764.38	25725.00	127691.01	519.77	153935.78

# WHEELABRATOR RIDGE ENERGY

## JUNE '95 STATS

19-Jul

		MSW		TOTAL MSW		OTHER FUELS		
	YARDWASTE PROCESSED TONS	TIRES PROCESSED TONS	TOTAL MSW PROCESSED TONS	WOOD PROCESSED TONS	PROPANE PROCESSED TONS	TOTAL PROCESSED TONS		
SUN								
MON								
TUE								
WED								
THU 1	101.34	67.25	168.59	645.28	15.83	829.70		
FRI 2	106.04	74.00	180.04	675.20	5.87	861.11		
SAT 3	133.69	99.39	233.08	851.32	0.38	1084.78		
SUN 4	132.25	103.88	236.13	729.99	0.63	966.75		
MON 5	99.96	88.92	188.88	551.75	10.76	751.39		
TUE 6	65.66	37.91	103.57	362.41	0.63	466.61		
WED 7	68.72	37.96	106.68	379.32	0.00	486.00		
THU 8	0.00	0.00	0.00	0.00	0.00	0.00		
FRI 9	0.00	0.00	0.00	0.00	1.87	1.87		
SAT 10	133.60	55.22	188.82	737.41	6.33	932.56		
SUN 11	49.88	63.55	113.43	578.62	12.03	704.08		
MON 12	72.78	81.44	154.22	844.30	0.00	998.52		
TUE 13	68.20	88.17	156.37	791.12	0.00	947.49		
WED 14	69.78	67.54	137.32	809.52	6.96	953.80		
THU 15	74.88	72.87	147.75	868.66	0.00	1016.41		
FRI 16	68.56	82.36	150.92	795.35	0.00	946.27		
SAT 17	68.49	57.37	125.86	794.48	5.70	926.04		
SUN 18	174.55	72.87	247.42	718.76	0.00	966.18		
MON 19	171.14	75.25	246.39	704.72	10.13	961.24		
TUE 20	174.05	107.50	281.55	716.72	0.00	998.27		
WED 21	158.60	104.58	263.18	653.11	0.00	916.29		
THU 22	50.88	16.96	67.84	209.51	0.00	277.35		
FRI 23	0.00	0.00	0.00	0.00	12.03	12.03		
SAT 24	202.81	77.04	279.85	835.13	6.33	1121.31		
SUN 25	103.70	85.36	189.06	949.95	0.00	1139.01		
MON 26	94.43	77.89	172.32	865.02	0.00	1037.34		
TUE 27	113.10	74.06	187.16	1036.02	0.00	1223.18		
WED 28	105.54	66.16	171.70	966.81	0.63	1139.14		
THU 29	98.54	70.33	168.87	902.62	0.00	1071.49		
FRI 30	100.69	93.99	194.68	922.34	0.00	1117.02		
SAT								

MTD	2861.85	1999.82	4861.67	19895.45	96.11	24853.23
			19.56%	80.05%	0.39%	100.00%

		MSW		TOTAL MSW		OTHER FUELS		
	YARDWASTE PROCESSED TONS	TIRES PROCESSED TONS	TOTAL MSW PROCESSED TONS	WOOD PROCESSED TONS	PROPANE PROCESSED TONS	TOTAL PROCESSED TONS		
WK 1	341.06	240.64	581.70	2171.81	22.08	2775.59		
WK 2	500.19	323.89	824.08	2760.88	20.23	3605.19		
WK 3	472.57	513.30	985.87	5482.05	24.69	6492.61		
WK 4	932.02	454.20	1386.22	3837.96	28.49	5252.67		
WK 5	616.01	467.79	1083.80	5642.75	0.63	6727.18		
MTD	2861.85	1999.82	4861.67	19895.45	96.11	24853.23		
			17.11%	82.55%	0.34%	100.00%		
YTD	16822.47	13764.20	30586.67	147586.46	615.88	178789.01		

RECEIVED

JUL 20 1995

Bureau of  
Air Regulation

July 17, 1995

State of Florida  
Department of Environmental Protection  
Chief Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Ridge Generating Station--Request for Permit Amendment to increase  
Tire Burning  
Air Permit #AC53-206244, PSD-FL-183

Attn: Mr. A. Linero

Dear Mr. Linero:

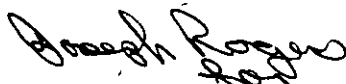
Pursuant to Facility correspondence dated April 17, 1995 and June 29, 1995, Department correspondence of July 3, 1995, and subsequent verbal communication with the Department, the Facility is willing to accept a revised SO<sub>2</sub> permit limit on an interim basis. It is our understanding that the Department will amend the subject permit to allow the combustion of 40% tires by heat input (approximately 16.9% by weight) with an interim SO<sub>2</sub> emission limit of 72 lb/hr, based on a 30-day rolling average.

It is also our understanding that if the CEMS data generated during this interim period demonstrates that higher SO<sub>2</sub> permit limits are justified, then the Department will consider this data prior to establishing a final permit limit for SO<sub>2</sub>.

We look forward to your early favorable reply. Upon receipt, we will publish the required 14-day public notice.

If you have any questions concerning this submittal, please do not hesitate to contact Gary Aguinaga at (941) 665-2255, or Matt Killeen at (603) 929-3420.

Sincerely,



Rodney Williams  
Plant Manager

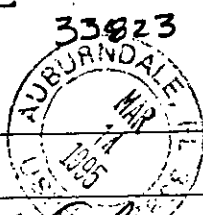
cc: F. Ferraro  
G. Aguinaga  
J. Rogers

M. Killeen  
C. Davis  
J. Goodwin

Certification #P 013 080 055

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • 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 mailpiece, 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. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Rodney Williams, Plant Mgr. Wheelabrator Ridge Energy 3131 K-ville Ave Auburndale, FL 33823		4a. Article Number P 872 563 675	
5. Signature (Addressee)		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
6. Signature (Agent) Linda K. Colon		7. Date of Delivery	
PS Form 3811, December 1991		8. Addressee's Address (Only if requested and fee is paid)	



Thank you for using Return Receipt Service.

PS Form 3811, December 1991    ★U.S. GPO: 1992-323-402    **DOMESTIC RETURN RECEIPT**

P 872 563 675



**Receipt for Certified Mail**  
 No Insurance Coverage Provided  
 Do not use for International Mail  
 (See Reverse)

PS Form 3800, JUNE 1991

Recipient Rodney Williams	
Street and No. Wheelabrator Ridge	
P.O., State and 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, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	3-8-95
proceed w/ testing	



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July 6, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Rodney Williams  
Plant Manager  
Wheelabrator Ridge Energy, Inc.  
3131 K-Ville Avenue  
Auburndale, Florida 33823

\* Not  
Signed

DRAFT

Dear Mr. Williams:

RE: Amendment to Construction Permit No. AC 53-206244, PSD-FL-183

The Department has reviewed your May 5, 1995 request to amend the tire firing capacity permit requirements and the interim emissions limits of the subject permit. The Department's determination on this amendment request is as follows:

**A. Firing Capacity:**

**Specific Condition No. 3 is amended as follows:**

**From:**

3. Fuel for firing the RGS boiler shall consist only of wood, landfill gas, and up to 9.0 percent tires (percent by weight equivalent to 20 percent tires based on heat content). The 9.0 percent tire weight limitation is equivalent to a tire firing rate of 9,000 pounds of tires per hour. Propane may be used as a startup, shutdown, and combustion stabilization fuel.

**To:**

3. Fuel for firing the RGS boiler shall consist only of wood, landfill gas, and up to 18.0 percent tires (percent by weight equivalent to 40 percent tires based on heat content). The 18.0 percent tire weight limitation is equivalent to a tire firing rate of 18,000 pounds of tires per hour. Propane may be used as a startup, shutdown, and combustion stabilization fuel.

**DRAFT**

**B. Emissions Limits:**

**Specific Condition No. 5 is amended as follows:**

**From:**

5. Initially, the RGS boiler exhaust gases shall not exceed the limits shown below. Following completion of the emission testing program required in Specific Condition No. 8, these limits may be revised.

<u>Pollutant</u>	<u>lbs/hr*</u>	<u>tons/yr</u>
PM/PM <sub>10</sub>	12.6	55.2
SO <sub>2</sub>	109.4	479.2
NO <sub>x</sub>	94.5	413.9
CO	315.0	1379.7
VOC	22.1	96.8
HCl	5.0	22.1
Hg	0.022	0.097
Pb	0.25	1.1
Be	0.0063	0.03

\*Based on 24 hour average. The feasibility of establishing startup/shutdown limits, hourly limits, or rolling average limits in addition to or in lieu of the above limits will be determined after analysis of the emission testing program.

**To:**

5. Initially, the RGS boiler exhaust gases shall not exceed the limits shown below. Following completion of the emission testing program required in Specific Condition No. 8, these limits may be revised.

<u>Pollutant</u>	<u>lbs/hr*</u>	<u>tons/yr</u>
PM/PM <sub>10</sub>	12.6	55.2
SO <sub>2</sub>	<b>63.0</b>	<b>275.9</b>
NO <sub>x</sub>	94.5	413.9
CO	315.0	1379.7
VOC	22.1	96.8
HCl	5.0	22.1
Hg	0.022	0.097
Pb	0.25	1.1
Be	0.0063	0.03

\*Based on 24 hour average. The feasibility of establishing startup/shutdown limits, hourly limits, or rolling average limits in addition to or in lieu of the above limits will be determined after analysis of the emission testing program.



**DRAFT**

**C. Attachments to be Incorporated:**

- Wheelabrator letter dated May 5, 1995
- DEP letter dated July 3, 1995

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this

Mr. Rodney Williams  
Wheelabrator Ridge, Inc.  
July 6, 1995  
Page 4 of 4

**DRAFT**

amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter amendment must be attached to the construction permit, No. AC 53 - 206244, PSD-FL-183 and shall become part of the permit.

Sincerely,

Howard L. Rhodes  
Director  
Division of Air Resources  
Management

HLR/AAL/kw

Attachment

cc: B. Thomas, SWD  
J. Reynolds, BAR  
S. Smallwood, P. E.  
J. Harper, EPA  
J. Bunyak, NPS

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy clerk hereby certifies that this AMENDMENT and all copies were mailed by certified mail before the close of business on \_\_\_\_\_ to the listed persons.

**FILING AND ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52(11),  
Florida Statutes, with the designated  
Department Clerk, receipt of which is  
hereby acknowledged.

\_\_\_\_\_  
Clerk

\_\_\_\_\_  
Date



*file*

# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

July 3, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Rodney Williams  
Plant Manager  
Wheelabrator Ridge Energy Inc.  
3131 K-Ville Avenue  
Auburndale, FL 33823

RE: Ridge Generating Station Permit Number AC53-206244, PSD-FL-183  
Request for Permit Amendment to Increase Tire Burning

Dear Mr. Williams:

The Department reviewed your request dated April 27, 1995 to increase the fraction of tires burned at your facility from 20 to 40 percent (%) and may not be able to approve it as an amendment under the conditions resulting from the recent testing. The reasons are that the sulfur dioxide (SO<sub>2</sub>) emission rate of 72.8 lb/hr under the 40% scenario exceeds the Best Available Control Technology (BACT) level of 63 lb/hr proposed by the Department in the original permit as well as the emission rate of 47.6 lb/hr measured under the 20% mode.

Wheelabrator apparently presumed that the allowable (and actual) emissions are 109.4 lb/hr based on the BACT level of 479.2 tons per year (TPY) originally proposed by the company and which has served as the interim emission limit until completion of the ongoing test program. The Department may indeed presume that actual emissions are the same as allowable emissions particularly in cases where a facility has not yet operated or operated for a very short period of time.

The Department, however, recommends that Wheelabrator commit to the interim limit of 63 lb/hr (275.9 TPY) as proposed by Department in its BACT determination. The final value can be set as previously agreed after Wheelabrator submits the rest of the data from the ongoing test program.

Based on your favorable reply, we will be able to issue an amendment of the original permit based on the enclosed draft. However our Notice will still need to be published.

We welcome your thoughts. If you have any questions on this matter, please call me or A. A. Linero at (904)488-1344.

Sincerely,

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/aal/l

cc: Steve Smallwood, P.E. *by Hand Delivery - U.A.L. 7/3/95*  
Bill Thomas, SWD  
John Reynolds, BAR

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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PS Form 3800, Marc. 1993

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Mr. Rodney Williams	
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3131 K-Ville Avenue	
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Auburndale, FL 33823	
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5 July 1995	
AC53-206244 PSD-FL-183	
Permit Draft Amendment	



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0102859

3131 K-ville Avenue  
Auburndale, FL 33823  
Tel 813-665-2255  
Fax. 813-665-0400

April 27, 1995

Mr. Clair Fancy, P.E.  
Chief, Bureau of Air Regulation  
Florida Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

May 5<sup>th</sup>, '95

Re: Ridge Generating Station  
Permit Number AC53-206244 PSD-FL-183  
Request for Permit Amendment

Dear Mr. Fancy:

Ridge Generating Station L.P. requests that Specific Condition #3 of the subject permit be amended to increase Ridge Generating Station's permitted tire firing capacity from 20 percent to 40 percent by heat input. Enclosed is the \$250.00 fee required to process this request.

Department approval to conduct special testing at 40% tires was received on February 9, 1995. Testing was conducted at the 40% heat input level during the first week of March, 1995. Test results clearly indicate that the facility emission limits can be met at the increased tire firing rate. Enclosed is data summarizing stack test results at 40% tires/60% wood and at 20% tires/80% wood.

Since increasing the percentage of tires combusted from 20% to 40% (heat input basis) does not result in any of the regulated air pollutants exceeding their maximum allowable BACT emission limits in the permit, it is appropriate to process this request as a permit amendment. Pursuant to Rule 62-212.200 (Definitions) (2) ("Actual Emissions"), (b) "The Department may presume that source specific allowable emissions for a source are equivalent to the actual emissions of the source provided that, for any air pollutant that is regulated by the EPA under the Clean Air Act, such source specific allowable emissions limits are federally enforceable." Rule 62-212.200 (Definitions), (2) ("Actual Emissions"), (c) states that "for a source which has not completed start-up and testing on a particular date, actual emissions shall equal the potential emissions at the source on that date."

The Facility has not completed start-up and testing, since the comprehensive emissions test program required by Specific Condition #8 of the subject permit has not yet been completed. The emission limits in the permit are federally enforceable. The potential emissions are the federally enforceable limits in the permit. The test data demonstrates that all of the federally enforceable BACT emission limits in the permit would be met. There are both operational and environmental benefits to burning a higher percentage of tires. Therefore, the facility's allowable emissions are its current "actual emissions."

Since the facility is not requesting an increase in any of the allowable emission limits, the requested change does not result in a "net emissions increase." If there is not a "net emissions increase," the proposed change in the method of operations is not a "modification." Therefore, the Department can process the requested change as an amendment to the permit.

Based on the above, it is requested that Specific Condition #3 of the subject permit be amended to read as follows:

**Fuel for firing the RGS boiler shall consist only of wood, landfill gas, and up to 16.1 percent tires by weight (equivalent to 40 percent tires based on heat content). The 16.1 percent tire weight limitation is equivalent to 18,505 pounds of tires per hour. Propane may be used as a startup, shutdown, and combustion stabilization fuel.**

Thank you for your early response to this request. This change is important to the Facility now because it will improve current operational flexibility and efficiency. It will also help to more rapidly alleviate the tire disposal problem in Florida. Facility representatives would be very happy to meet with you if you have questions related to this submittal or if you require additional information. Please do not hesitate to contact Gary Aguinaga at (813) 665-2255.

Sincerely,



Rodney Williams  
Plant Manager

Certification # P 013 080 037

cc: B. Proses (DEP, SW District)  
W. Ferguson  
F. Ferraro  
M. Killeen  
G. Aguinaga  
S. Smallwood

**Wheelabrator Ridge Energy, Inc. - Summary of Results**

**Condition I - 80% Wood/20% Tires at 100% Load**

**February/March 1995**

POLLUTANT	UNITS	TEST RESULT				PERMIT LIMIT	COMMENT
		Rep. 1	Rep. 2	Rep. 3	Average*		
Particulate/PM10	lb/hr	2.2	2.0	1.1	1.8	12.6	
Sulfur Dioxide	lb/hr	68.9	40.6	33.2	47.6	109.4	
Nitrogen Oxides	lb/hr	82.4	86.6	84.3	84.4	94.5	
Carbon Monoxide	lb/hr	58.0	72.8	46.8	59.2	315.0	
Non-Methane Hydrocarbon	lb/hr	3.2	2.7	1.3	2.4	22.1	
Hydrogen Chloride	lb/hr	0.1	0.5	0.1	0.2	5	Rep. 1 & 3 were Non-Detect
Mercury	lb/hr	8.0E-04	8.7E-04	8.7E-04	8.5E-04	0.022	Rep. 1,2 & 3 were Non-Detect
Lead	lb/hr	1.8E-03	8.8E-03	5.6E-04	3.7E-03	0.25	
Beryllium	lb/hr	1.9E-05	1.9E-05	1.8E-05	1.9E-05	0.0063	Rep. 1,2 & 3 were Non-Detect

\* - Non Detect values used in averages for worst case.

**Condition III - 60% Wood/40% Tires at 100% Load**

**February/March 1995**

POLLUTANT	UNITS	TEST RESULT				PERMIT LIMIT	COMMENT
		Rep. 1	Rep. 2	Rep. 3	Average*		
Particulate/PM10	lb/hr	0.43	2.0	1.82	1.4	12.6	
Sulfur Dioxide	lb/hr	74.2	87.3	56.9	72.8	109.4	
Nitrogen Oxides	lb/hr	78.1	77.0	82.2	79.1	94.5	
Carbon Monoxide	lb/hr	56.6	64.3	63.7	61.5	315.0	
Non-Methane Hydrocarbon	lb/hr	1.5	0.9	1.3	1.2	22.1	
Hydrogen Chloride	lb/hr	0.1	0.2	0.2	0.2	5	
Mercury	lb/hr	9.1E-04	9.0E-04	8.0E-04	8.7E-04	0.022	Rep. 1,2 & 3 were Non-Detect
Lead	lb/hr	4.0E-03	6.1E-04	2.2E-04	1.6E-03	0.25	
Beryllium	lb/hr	1.8E-05	1.8E-05	1.8E-05	1.8E-05	0.0063	Rep. 1,2 & 3 were Non-Detect

\* - Non Detect values used in averages for worst case.

a:\feb95.wk4

RIDGE GENERATING STATION, L.P.  
3131 K-VILLE AVENUE  
AUBURNDALE, FL 33823  
(813) 665-2255

BARNETT BANK  
AUBURNDALE, FLORIDA 33823  
63-600/631 - 6

0102869

1152

April 28, 1995

PAY TO THE ORDER OF Florida Department of Environmental Protection \$ 250.00

Two-hundred and fifty 00/100 ----- DOLLARS

MEMO Air Permit Amendment Request

RC Williams

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1396104015⑈



