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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 5th, '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	down
Sulfur Dioxide	lb/hr	74.2	87.3	56.9	72.8	109.4	up
Nitrogen Oxides	lb/hr	78.1	77.0	82.2	79.1	94.5	down
Carbon Monoxide	lb/hr	56.6	64.3	63.7	61.5	315.0	down
Non-Methane Hydrocarbon	lb/hr	1.5	0.9	1.3	1.2	22.1	up
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	up up up
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.

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