



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

July 11, 1994

Certified Mail - Return Receipt Requested

Mr. John P. Goodwin
Wheelabrator Environmental Systems, Inc.
Liberty Lane
Hampton, New Hampshire 03842

RE: Initial Compliance Test-Ridge Generating Station-AC 53-206244

Dear Mr. Goodwin:

We received your June 23 letter about the proposed procedures for conducting compliance tests at the above referenced source. The use of a different test method to measure a pollutant for which there is an adopted method in Chapter 17-297, F.A.C., requires approval pursuant to Rule 17-297.620, F.A.C. The modification of an adopted procedure also requires approval pursuant to Rule 17-297.620, F.A.C. Alternate standards and procedures are approved on an individual source-by-source basis. Therefore, the issuance of an Order approving the use of an alternate sampling procedure at one facility (i.e., South Broward) does not automatically sanction its use at another facility (i.e., Ridge Energy).

The proposal still includes test methods which are different from those required by the permit and which have not been adopted in Chapter 17-297, F.A.C. The Department has adopted EPA Methods 5 and 17 for particulate, EPA Method 12 for lead (Pb), EPA Method 104 for beryllium (Be), EPA Method 108 for arsenic (As), and EPA Method 26 for hydrochloric acid (HCl) in Rule 17-297, F.A.C. The use of EPA Method 0050 for particulate and hydrochloric acid; and the method in 40 CFR 266, Appendix IX Section 3.1 for arsenic (As), beryllium (Be), and lead (Pb) will require approval as alternate sampling procedures. EPA Method 23 is for the measurement of polychlorinated dibenzo-p-dioxins/polychlorinated dibenzofurans (PCDFs/PCDDs) and the incorporation of any deviations for the measurement of polychlorinated biphenyls (PCBs) will also require prior approval as an alternate sampling procedure.

The Department will consider approval of the proposed methods if the information required by Rule 17-297.620, F.A.C., is provided. The additional information should include detailed descriptions of

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the sampling and analytical procedures for polychlorinated biphenyls (PCBs) and ammonia (NH₃). Please furnish a copy of the results of the EPA Method 301 validation procedure for ammonia (NH₃). A letter requesting guidance concerning the most appropriate sampling and analytical procedures for polychlorinated biphenyls (PCBs) and ammonia (NH₃) is being sent to EPA. EPA has recently adopted Method 26A for the measurement of halogens. Since EPA Method 26A has not yet been adopted by the Department, its use for the measurement of halogens and particulate would require approval as an alternate sampling procedure. The Department is more likely to consider approval of EPA Method 26A than EPA Method 0050.

If you have any questions, please call Ramesh Menon at (904) 488-1344 or write to me.

Sincerely,



Michael D. Harley, P.E., DEE
P.E. Administrator
Emissions Monitoring Section

Enclosure

cc: C. Fancy
J. Brown
J. Pennington
W. Thomas, S.W. District
D. McNeal, EPA Region IV