

① JOHN REYNOLDS

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Florida Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

June 14, 1994

PL INFO.
File w/permit JS

Certified Mail - Return Receipt Requested

Mr. Gary S. Aguinaga
Wheelabrator Ridge Energy Inc.
3131 K-Ville Avenue
Auburndale, Florida 33823

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

Dear Mr. Aguinaga:

We received the proposed test schedule for the above referenced source on June 13, 1994, and have reviewed it. The proposed schedule 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. Those specific test methods include 1) EPA Method 0050 for particulate (PM/PM₁₀), ammonia (NH₃), arsenic (As), and hydrochloric acid (HCl); 2) EPA Method 29 for mercury (Hg), beryllium (Be), and lead (Pb); and, 3) EPA Method 13B for hexavalent chromium (Cr⁺⁶). The use of these proposed methods would require advance approval as alternate sampling procedures pursuant to Rule 17-297.620, F.A.C. A copy of the rule is attached for your information.

Since EPA Method 29 is still a conditional test method which has not been adopted by EPA, it is unlikely that its use will be approved for the measurement of metals. However, the Department may consider approving the use of the RCRA multi-metals method in 40 CFR 266 Appendix IX for the metals cadmium (Cd), chromium (Cr), and zinc (Zn). Please note that EPA Method 13B is for fluoride (F⁻) and not for hexavalent chromium (Cr⁺⁶). EPA Method 23 is for polychlorinated dibenzo-p-dioxins/polychlorinated dibenzofurans and not for polychlorinated biphenyls (PCBs). A description of the proposed test procedures for ammonia (NH₃), hexavalent chromium (Cr⁺⁶), and polychlorinated biphenyls (PCBs) will be required.

The proposed schedule also includes several deviations from the adopted procedures in Chapter 17-297, F.A.C., and 40 CFR 60. The deviations include the proposal to conduct tests for polychlorinated dibenzo-p-dioxins/polychlorinated dibenzofurans that consist of only 1-2 runs, the proposal not to conduct the required EPA Method 9 evaluations concurrent with the particulate testing,

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and the proposal to conduct 15-minute observations using EPA Method 22. These deviations also require approval pursuant to Rule 17-297.620, F.A.C.

The purpose of the six EPA Method 2, 3, and 4 runs is not clear. If these measurements are for the purpose of determining mass emissions, the testing needs to be concurrent with testing for each of the specific pollutants for which a mass emission rate is required. An acceptable compliance test generally consists of three runs. If this testing is for the purpose of certifying continuous emission monitors, then a minimum of 9 runs is required.

Requests for approval of alternate standards and procedures are processed by the Division of Air Resources Management in Tallahassee (specifically the Emissions Monitoring Section). In order to satisfy the demonstration requirements of Rule 17-297.620(2)(d), F.A.C., the Department routinely requires the petitioner to test the source simultaneously using both the adopted procedure and the proposed procedure. The processing of a request for approval of an alternate standard or procedure generally requires a minimum of about 90 days from the date that all of the required information is received.

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
D. McNeal

 *Wheelabrator Ridge Energy Inc.*



State of Florida
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Fax. 813-665-0400

April 4, 1994

Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

RECEIVED

Attn: Mr. W. Thomas

APR 11 1994

Subject: Ridge Generating Station
Air Permit #AC53-206244: Notifications

Bureau of
Air Regulation

Dear Sir:

In accordance with 40 CFR 60.7 and the subject permit, this letter serves as notification of initial start-up of this facility.

Solid fuel firing at Ridge Generating Station commenced on March 30, 1994.

To update my letter of February 17, 1994, our present schedule calls for emissions testing as follows:

Opacity Conditioning Period:	April 17-23, 1994
CEMS 7-Day Drift Test:	May 1-8, 1994
Initial Stack Test Program:	May 9-15, 1994
CEMS Certification (RATA):	May 9-15, 1994

If there are any questions or concerns regarding the above, please call Mr. Gary Aguinaga, Director of Environmental Health and Safety, at (813) 665-2255.

Sincerely,



Rodney Williams
Plant Manager

GA/lc

cc: C. Wilson
G. Aguinaga
J. Rogers
M. Killeen
D. Raymond

J. Goodwin
DEP-Chief Bureau of Air Regulation
EPA IV
Cert. #389 398 502

G. Reynolds
M. Harley
B. Thomas *EW List*