

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

FROM: *for* Clair Fancy *JKP*

DATE: August 8, 1995

SUBJECT: Wheelabrator Ridge, Auburndale increase from 9 to 16.9 percent
tires. AC53-206244, PSD-FL-183(A)

Attached is an amendment to Wheelabrator Ridge's air construction permit for a 50 MW tire, landfill gas, wood and vegetative debris burning facility. The proposed amendment will allow Wheelabrator to increase the fraction of tires burned from 9 percent to 16.9 percent (from 20 percent to 40 percent as heat input). Results from a test burn indicate that the facility will continue to operate within its presently allowable emissions limits.

The construction permit is still active because of the need to conduct a year-long emissions measurement program in order to propose a final BACT emissions limit for SO₂. This amendment was processed now, rather than after the final BACT determination, because tires burn better than much of the wood and vegetative debris being burned this summer.

CHF/al/w

Attachment



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Williams:

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

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 16.9 percent tires (percent by weight equivalent to 40 percent tires based on heat content). The 16.9 percent tire weight limitation is equivalent to a tire firing rate of 16,900 pounds of tires per hour. Propane may be used as a startup, shutdown, and combustion stabilization fuel.

Mr. Rodney Williams
 Wheelabrator Ridge, Inc.
 August 8, 1995
 Page 2 of 4

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 ₁₀	12.6	55.2
SO ₂	109.4	479.2
NO _x	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 ₁₀	12.6	55.2
SO ₂	72.0†	315.4
NO _x	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. †Based on a 30-day rolling average. The feasibility of establishing startup/shutdown limits, hourly limits, or rolling average limits in addition to

Mr. Rodney Williams
Wheelabrator Ridge, Inc.
August 8, 1995
Page 3 of 4

or in lieu of the above limits will be determined after analysis of the emission testing program.

C. Attachments to be Incorporated:

- Wheelabrator letter dated April 27, 1995
- DEP letter dated July 3, 1995
- Wheelabrator letter dated July 17, 1995
- DEP letter dated July 17, 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

Mr. Rodney Williams
Wheelabrator Ridge, Inc.
August 8, 1995
Page 4 of 4

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 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

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 8-9-95 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

8-8-95
Date

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

ATTACHMENTS AVAILABLE UPON REQUEST

Is your RETURN ADDRESS completed on the reverse side?

SENDER: • 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: <i>Rodney Williams, Plant Mgr Wheelabrator Ridge Energy 3131 K-Ville Avenue Auburndale, FL 33823</i>		4a. Article Number <i>2392 979 018</i>	
		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	
5. Signature (Addressee)		7. Date of Delivery <i>8/16/95</i>	
6. Signature (Agent) <i>Linda Colon</i>		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: 1993-352-714 **DOMESTIC RETURN RECEIPT**

2 392 979 018



Receipt for Certified Mail

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

PS Form 3800, March 1993

Sent to	<i>Rodney Williams, Plant Mgr</i>	
Street and No.	<i>3131 K-Ville Avenue</i>	
P.O., State and ZIP Code	<i>Auburndale, FL 33823</i>	
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	<i>Sent 8/18/95 AC 93-206244 PSD FL-183(A) Final Enclosure</i>	