



File

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
July 17, 1995

Virginia B. Wetherell
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: Amendment of Permit No. AC53-206244, PSD-FL-183(A)

Dear Mr. Williams:

Enclosed is one copy of the Draft Permit Amendment, Intent to Issue, and Notice of Intent to Issue for the Ridge Generation Station located in Polk County, Florida. This amendment allows the facility to burn up to 16.9 percent tires (40 percent of heat input). All of the interim air pollution limits (except for sulfur dioxide) remain the same as in the original permit. The interim sulfur dioxide limit has been reduced to 72 pounds per hour on a 30-day rolling average

Pursuant to discussions with your consultant and company personnel we still need to review the recently submitted long term emissions monitoring data prior to setting a final Best Available Control Technology (BACT) and permit sulfur dioxide limit. It may be higher or lower than the revised interim limit and may be expressed on a different basis. BACT limits are generally related to cost-effectiveness of control and not just a statistically probable value. Therefore we expect Wheelabrator Ridge to minimize any actual emissions increase caused by burning additional tires.

Please submit any comments you may have concerning the Department's proposed action to Mr. A. A. Linero, P. E., at the above address. If you have any questions regarding this matter, please call Mr. Linero at (904) 488-1344.

Sincerely,

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

CHF/aal/w

cc: Steve Smallwood, P. E.
Bill Thomas, SWD
John Reynolds, BAR
Jewell Harper, EPA
John Bunyak, NPS

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

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT AMENDMENT

PSD-FL-183(A)
AC53-206244

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment to Wheelabrator Ridge Energy, Inc., 3131 K-Ville Avenue, Auburndale Florida 33823. This recently constructed and permitted facility consists of a stoke boiler which combusts waste wood, landfill gas, and up to 9 percent tires (by weight) while generating up to 50 megawatts of electric power. The amendment will allow the facility to burn up to 16.9 percent tires (40 percent of heat input). Emissions of acid gasses, metals, and particulate matter are controlled by a lime spray dryer/fabric filter and a selective non-catalytic reduction unit. Recent testing showed that emissions when burning 16.9 percent tires will be within the present permit limits. Additionally the applicant has agreed to reduce its interim sulfur dioxide emission limit from 109.4 pounds per hour to 72 pounds per hour.

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, within 14 days of publication of this notice. 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 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 Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application/ request 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 publication of this notice 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, Florida Administrative Code.

The application/request is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Central District
Suite 200B
7825 Baymeadows Way
Jacksonville, Florida 32256-7577

Any person may send written comments on the proposed action to Administrator, New Source Review Section at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 . All comments received within 14 days of the publication of this notice will be considered in the Department's final determination.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

DEP File No. AC53-206244 PSD-FL-183(A)
Polk County

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

INTENT TO ISSUE PERMIT AMENDMENT

The Department of Environmental Protection (Department) gives notice of its intent to issue a permit amendment (copy attached) to the applicant as detailed in the application/request specified above for the reasons stated in below.

The applicant, Wheelabrator Ridge Energy, Inc., applied on May 5, 1995 to the Department to amend the current air construction permit issued for its facility located in Polk County pursuant to Prevention of Significant Deterioration (PSD permit). The amendment will allow the applicant to increase the amount of tires burned at its recently construction facility from 9 percent (by weight) to 16.9 percent (40 percent of heat input) while generating up to 50 megawatts of electric power.

The facility demonstrated that it could comply with previously set interim emission limits under both the 9 percent and 16.9 percent tire burning scenarios. The Department chose to lower the existing interim sulfur dioxide limitation and allow the facility to operate as requested while a final Best Available Control Technology (BACT) determination is conducted.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a permit amendment and public notice is required for the proposed work.

Pursuant to Section 403.815, F.S., and Rule 62-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit Amendment. The notice shall be published one time only within 30 days in the legal ad section of a newspaper of general circulation in the area affected. For

the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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, 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 permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of their receipt of this intent, whichever first occurs. 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 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 intent. Persons whose substantial interests will be affected

by any decision of the Department with regard to the application/ request 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 intent 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

C. H. Fancy ^{7/17} P.E. for

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this INTENT TO ISSUE PERMIT AMENDMENT all copies were mailed by certified mail before the close of business on 7-18-95 to the listed persons.

Clerk Stamp
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.

Ken Joken 7-18-95
Clerk Date

Copies furnished to:

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



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August xx, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

DRAFT

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 18.0 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.

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

Printed on recycled paper.

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 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	63.0 †	275.9
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

DRAFT

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 May 5, 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;
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- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
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- (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 xx, 1995
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DRAFT

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

Mr. Rodney Williams
Wheelabrator Ridge, Inc.
August xx, 1995
Page 5 of 5

DRAFT

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

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

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. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Rodney Williams, Plant Mgr.
 Wheelabrator Ridge Energy
 3131 K-Ville Ave
 Auburndale, FL

4a. Article Number
 Z 392 979 061

- 4b. Service Type
- Registered Insured
 - Certified COD
 - Express Mail Return Receipt for Merchandise

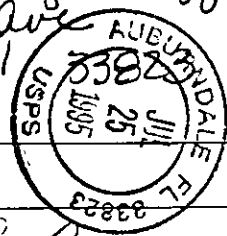
7. Date of Delivery

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Linda Colon



PS Form 3811, December 1991 U.S. GPO: 1993-352-714 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

Z 392 979 061



Receipt for Certified Mail

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

PS Form 3800, March 1993

To: Rodney Williams	
Street and No: Wheelabrator Ridge	
City, State and ZIP Code: Auburndale, GA	
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	7-18-95
AC 53-206244	
PSD-F1-183(A)	