



# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 17, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Macauley Whiting, Jr., President  
Decker Energy - Ridge, Inc.  
P.O. Box 2397  
Winter Park, Florida 32790

Re: Permit Application AC 53-206244, PSD-FL-183  
Ridge Generating Station

Dear Mr. Whiting:

The Department received the subject application on December 20, 1991, and reviewed it for completeness. Your consultant did a commendable job. Only a few points need to be clarified or expanded. These items are listed below:

1. The flow diagram shows no bypass around the dry scrubber/baghouse. There may be times when the boiler flue gas temperature exceeds the baghouse design temperature. Are there plans to install a bypass and if so, under what conditions would the bypass be open?
2. How many days supply of wood and tires will be stored on site? Will landfill gas be available in sufficient quantities to offset temporary shortages of wood or tires? Are there contingency plans for use of other alternate fuels and if so, what are they?
3. Unreacted ammonia from the SNCR system may pose a difficult control problem due to variability in the fuel mix. Given the public's and the Department's concern about ammonia discharges from phosphate plants in the area, some control system or practice must be in place to effectively prevent ammonia from being detected beyond the RGS property line. The application states that this problem will be minimized through careful attention to combustion control by the operator (i.e. manual adjustments). A properly designed facility should have some control loop or system such that the operator will not have to make very many manual adjustments. The application should address other methods that may prove necessary for controlling ammonia slip.

Mr. Macauley Whiting, Jr  
Page 2 of 2

4. Table B-2 lists essentially the same emission factors for all three fuel types. Typically, one would expect some difference, although small. It would be helpful to include footnoted or numbered references in the discussion so that items such as "test data and other literature" could be properly identified. Also, an explanation of the rationale that went into derivation of the emission rates would be desirable.
5. The flow diagram contains a table showing the process material balance. Review of the application would be facilitated if the diagram also showed process conditions, including flue gas temperatures ahead of and after the baghouse.
6. The predicted maximum SO<sub>2</sub> 24-hour and 3-hour concentrations in the Chassohowitzka PSD Class I area due to the Ridge Generating Station boiler emissions are greater than the National Park Service proposed 24-hour and 3-hour significant impact levels of 0.07 and 0.48 ug/m<sup>3</sup>, respectively. Please perform a cumulative 24-hour and 3-hour SO<sub>2</sub> Class I increment analysis as required by the National Park Service. An air quality related values (AQRVs) should also be done since there are presently no significant impact levels that exempt a proposed PSD project from performing this analysis. The AQRVs analysis includes impacts to soils, vegetation, and wildlife.

If further clarification is needed on any of the above, please contact the permit engineer, John Reynolds, or the permit meteorologist, Cleve Holladay, at 904-488-1344.

Sincerely,



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

CHF/JR/plm

c: W. Thomas, SWD  
T. Fitzpatrick, P.E.  
J. Little, D & M  
M. Killeen, WESI  
J. Harper, EPA  
C. Shaver, NPS

Add Polk County → Donald Martin

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 21-Jun-2000 02:52pm  
**From:** John Reynolds TAL  
REYNOLDS\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9536

**To:** Gerald Kissel TPA ( KISSEL\_G @ A1 @ DEPTPA )

**Subject:** Wheelabrator Ridge Combined Notice

Gerry, please review the attached as soon as you can and let me know if this is OK. Thanks.

June 29, 2000

Certified Mail - Return Receipt Requested

Mr. John N. Rivara  
Plant Manager  
Wheelabrator Ridge Energy, Inc.  
3131 K-Ville Avenue  
Auburndale, Florida 33823

Re: DEP File No's. 1050216-004-AC (PSD-FL-183B) and 1050216-005-AV  
Permit Modification for Ash Building Wet Scrubber

Dear Mr. Rivara:

Enclosed is one copy of the combined Draft PSD Permit Modification/Revised Title V Operation Permit for the Ash Building located at 3131 K-Ville Avenue, Auburndale, Polk County. Also enclosed are the Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit and the Public Notice of Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit.

An electronic version of the above documents is posted on the Division of Air Resources Management's world wide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is <http://www.dep.state.fl.us/air>.

The Public Notice of Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit must be published one time only, as soon as possible, in the legal advertisement section of a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of publication, i.e., newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permits.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A. A. Linero, P.E., Administrator, New Source Review Section at the above letterhead address. If you have any other questions, please contact John Reynolds, Permit Engineer, at 850/921-9536.

Sincerely,

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

CHF/JR

Enclosures

Wheelabrator Ridge Energy, Inc.  
DEP File No's. 1050216-004-AC (PSD-FL-183B)/1050216-005-AV  
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In the Matter of an  
Application for Permit by:

Wheelabrator Ridge Energy, Inc.  
3131 K-Ville Avenue  
Auburndale, Florida 33823

DEP File Nos. 1050216-004-AC (PSD-FL-183B)  
and 1050216-005-AV  
Polk County

**INTENT TO ISSUE PSD PERMIT MODIFICATION/REVISED TITLE V AIR  
OPERATION PERMIT**

The Department of Environmental Protection (Department) gives notice of its intent to issue a combined PSD permit modification/Revised Title V Air Operation Permit for the proposed action as detailed in the Draft permit modification enclosed and for the reasons stated below.

The applicant, Wheelabrator Ridge Energy, Inc., applied on May 2, 2000, to the Department for a PSD permit modification and a revised Title V Air Operation Permit to install a wet scrubber for the Ash Handling Building located at the above address in Auburndale, Polk County. The modification will consist of installing a wet scrubber system to ventilate the ash handling building for employee comfort and safety.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212, and 62-213. The above actions are not exempt from permitting procedures. The Department has determined that a PSD permit modification/Revised Title V Air Operation Permit is required to make the proposed changes.

The Department intends to issue this PSD permit modification/Revised Title V Air Operation Permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-256, 62-257, 62-281, 62-296, 62-297, F.A.C. and 40CFR 52.21.

Pursuant to Sections 403.815 and 403.087, F.S., and Rules 62-110.106(7)(a)1 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "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. If you are uncertain that a newspaper meets

these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/ 922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the Final PSD permit modification/Final Revised Title V Operation Permit in accordance with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed PSD permit modification issuance action for a period of 14 (fourteen) days and the proposed Title V permit issuance action for a period of 30 (thirty) days from the date of publication of the Public Notice of Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall issue a revised Draft permit and require, if applicable, another Public Notice.

The Department will issue the permits with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of

publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. ~~The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.~~

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35,



Wheelabrator Ridge Energy, Inc.

DEP File No's. 1050216-004-AC (PSD-FL-183B)/1050216-005-AV

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Tallahassee, Florida 32399-3000 The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

The following paragraph applies to the Revised Title V Air Operation Permit:

Finally, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street S.W., Washington, D.C. 20460.

Executed in Tallahassee, Florida.

Wheelabrator Ridge Energy, Inc.

DEP File No's. 1050216-004-AC (PSD-FL-183B)/1050216-005-AV

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

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit (including the Public Notice of Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit, and the Draft PSD Permit Modification/revised Title V Air Operation Permit) was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on \_\_\_\_\_ to the person(s) listed:

- Mr. John N. Rivara, WREI \*
- Mr. Bill Thomas, SWD
- Mr. Jeff Spence, PCESD
- Ms. Iris Hill, PCESD
- Mr. Gregg Worley, EPA
- Mr. John Bunyak, NPS
- Ms. Elizabeth Bartlett, EPA (Internet E-mail Memorandum)

Clerk Stamp

**FILING AND  
ACKNOWLEDGMENT FILED,**  
on this date, pursuant to §120.52,  
Florida Statutes, with the designated  
Department Clerk, receipt of which  
is hereby acknowledged.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

**PUBLIC NOTICE OF INTENT TO ISSUE PSD PERMIT  
MODIFICATION/REVISED TITLE V OPERATING PERMIT**

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DEP File Nos. 1050216-004-AC (PSD-FL-183B) and 1050216-005-AV

Wheelabrator Ridge Energy, Inc.  
Wet Scrubber for Ash Handling Building  
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue a PSD Permit Modification/Revised Title V Air Operation Permit for the Wheelabrator Ridge Energy, Inc., Plant located in Auburndale, Polk County. The applicant's mailing address is: 3131 K-Ville Ave., Auburndale, Florida 33823. A Best Available Control Technology (BACT) Determination revision was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

This facility produces electric power using waste wood and tires for fuel. To enhance employee comfort and safety in the Ash Handling Building, the applicant proposes to install an orifice-type wet scrubber to remove particulate matter from the building's ventilation system. No other changes are being requested in this modification/revision. Potential emissions of particulate matter from this modification are estimated at 1.0 lb/hour and 4.5 tons/year.

The Department will issue the permit modification/revision with the proposed changes to permit conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days for the PSD Permit Modification and 30 (thirty) days for the Revised Title V Air Operation Permit from the date of publication of this Public Notice of Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permits and require, if applicable, another Public Notice.

The Department will issue the permits with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision

notice to be published in the newspaper

may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

notice to be published in the newspaper

**The following paragraph applies to the Revised Title V Operating Permit:**

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file 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 Suite 4, 111 S. Magnolia Drive Tallahassee, Florida, 32301 Telephone: 850/488-0114 Fax: 850/922-6979	Polk County Environmental Services Department/Natural Resources Division 4177 Ben Durrance Road Bartow, Florida 33830 Telephone: 863/534-7377 Fax: 863/534-7374	Department of Environmental Protection Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619 Telephone: 813/744-6100 Fax: 813/744-6084
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The complete project file includes the application, Draft permit modification/revision, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, or the Department's reviewing engineer for this project, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

notice to be published in the newspaper

Mr. John N. Rivara  
Permit No. 1050216-004-AC/PSD-FL-183B  
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July XX, 2000

Certified Mail - Return Receipt Requested

Mr. John N. Rivara  
Plant Manager  
Wheelabrator Ridge Energy, Inc.  
3131 K-Ville Avenue  
Auburndale, Florida 33823

Re: DEP File No. 1050216-004-AC (PSD-FL-183B)  
Permit Modification – Wet Scrubber for Ash Handling Building

Dear Mr. Rivara:

As requested, the following permit modification provides for installation of a wet scrubber to remove particulate matter from the Ash Handling Building ventilation system. The changes to the permit are indicated below:

Specific Condition No. 6

Visible emissions from the ash handling area vent filter, the lime silo vent filter, and the fuel transfer building vent filter shall not exceed 10 percent opacity. Particulate matter emissions from the ash handling building scrubber shall not exceed 20 percent opacity, 1.03 lb/hr and 4.51 tons/year. [Rule 62-212.400, F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

This permitting decision is issued pursuant to Chapter 403, Florida Statutes. Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

\_\_\_\_\_  
Howard L. Rhodes, Director  
Division of Air Resources Management

Mr. John N. Rivara  
Permit No. 1050216-004-AC/PSD-FL-183B  
Page

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on \_\_\_\_\_ to the person(s) listed:

Mr. John N. Rivara, WREI\*  
Mr. Bill Thomas, SWD  
Mr. Jeff Spence, PCESD  
Ms. Iris Hill, PCESD  
Mr. Gregg Worley, EPA  
Mr. John Bunyak, NPS

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52,  
Florida Statutes, with the designated Department  
Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)



# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 15-Jun-2000 03:50pm

**From:** Gerald Kissel TPA 813/744-6100

KISSEL\_G@a1.deptpa.dep.state.fl.us

**Dept:**

**Tel No:**

**To:** John Reynolds TAL

( REYNOLDS\_J@A1 )

**CC:** Scott Sheplak TAL

( SHEPLAK\_S@A1 )

**CC:** Alvaro Linero TAL

( LINERO\_A@A1 )

**Subject:** concurrent processing of AC's & AV's

I'm doing a long writeup on the concurrent processing of AC's and AV's which is only about half done, but it's attached anyway just fyi.

Meanwhile, attached is the revised cover letter/intent/public notice for our current case. It essentially uses Wendy Alexander's format for one that she did for Wheelabrator North Broward, with the exception that where her intent and public notice say 'the Dept. will accept written comments on the draft AC/Title V permit for 30 days' this format says 'the Dept will accept written comments on the draft AC for 14 days and the draft AV for 30 days'. This anticipates that the concurrent processing will diverge after the public notice. At that point, the AC will be issued separately, by the PSD section, just as you normally do, and then later, after demonstration of compliance, we'll reactivate the Title V revision process (this may involve a waiver from the applicant because of the time lag) and proceed with the Title V revision. But at least the stage through the public notice will have been completed already and won't have to be duplicated for the Title V revision. It's a little more complicated than that, but generally, it can work in this way.

Also, I believe the PSD permit should (but it's not essential) have operating permit elements in it - like specifying not only the initial compliance test, but annual tests thereafter. Please contact us when you do the actual permit.

I'll be out of the office until June 26.

I'm also sending by regular mail the markup of your cover letter/intent/public notice, so you can see what was changed.

June 13, 2000

To: File

From: J. Kissel

Subject: Concurrent processing of AC's and Title V revisions

This memo outlines some suggestions for processing and includes some formats.

Background

The Title V Application Form [62-210.900(1) 2/11/99] leads the applicant toward common processing of AC's and Title V revisions on the "Purpose of Application" page by including a block to check which says:

- [ ] Title V permit revision or administrative correction to address one or more new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Since AC's and TV revisions both require an Intent, Public Notice, and draft permit, it is desirable from our standpoint to combine the AC and TV revision when we can. There are two main tracks - the TV revision and the admin correction. The admin correction is simpler and discussed first.

Administrative Permit Correction concurrent with AC

If a construction permitting process meets all the Title V processing requirements, the resulting AC can be incorporated into the Title V permit, by issuing a Title V admin permit correction. The rules are specific on this point [ref. 210.360(4) & (5)], but don't get into implementation details.

In most cases, these would seem to be simple changes like increasing a production limit from a prior AC where there are no PSD implications. It seems as if the new AC can either be in typical AC format or in Title V format, which seems preferable. In any case, the AC should include the needed elements for the TV permit, e.g., testing requirements beyond the initial compliance test, since the admin permit correction is not designed to add additional conditions, but rather to provide a processing mechanism to incorporate AC's into TV permits.

Regarding entry of this process in the ARMS system, the ARMS event screen includes a 60 day clock for admin permit corrections. It is not clear from the rule, however (see 210.360), that the 60 day clock refers to this type of admin permit correction, as opposed to the type of admin permit correction to correct minor errors. In fact, if an ARMS project "AV03 Admin Permit Correction" is opened

concurrently with the AC project, the 60 day clock in ARMS on the AV03 project will usually have expired before the AC is issued. Also, AV03's are not designed for incompleteness letters, waivers, etc. - they

6/13/00 AC/TV page 2

seem to be pass/fail, issue or deny. So as a practical matter, the "concurrent processing" can be handled by opening a project for an "AV03 Admin Permit Correction" upon issuance of the AC, and then the Admin Permit Correction can be issued.

#### Title V Revision concurrent with AC

Typically, two ARMS project numbers are assigned when the application is received, one for the AC and one for the TV revision. Then there are two principle tracks for this concurrent processing:

TRACK 1: AC and TV revision processed concurrently through the final simultaneous issuance of the AC and the TV revision. The AC and TV revision can be a common document or separate documents. If a common document, there may have to be places in the permit where there is a statement that 'This condition applies to the AC only...' or 'This condition applies to the AV only...' Also, this can be complicated when a demonstration of compliance is required before issuance of the TV revision; the TV revision could require a compliance plan as part of the permit.

TRACK 2: AC and TV revision processed concurrently through the Intent, Public Notice, and Draft Permits, followed by separate issuance of the AC, and later issuance of the TV revision. This is the more common situation, where the applicant applies for concurrent processing of the AC and TV revision, but since the TV revision process takes much longer (the Proposed Permit step and EPA review adds a couple of months), the applicant would like to get the AC issued separately. This is followed later by the Title V revision. This track is not addressed specifically in the rules, but is not precluded by them. In this case, the AC and TV revisions can be a common document or separate documents through the intent/public notice/draft permit stage, but thereafter must become separate documents for issuance of the AC and the Proposed TV revised permit.

There are various practical difficulties associated with implementing Track 2. Nevertheless, it seems worthwhile to resolve them, because of the efficiency involved in going through the intent/public notice/draft step just once, instead of separately for the AC and the TV revision. Also, since the AC is often issued by the Tall'e PSD section and the corresponding TV revision is issued by the District, this is the case that should be

RFC-822-headers:

Received: from epic50.dep.state.fl.us ([199.73.195.8])  
by mail.epic1.dep.state.fl.us (PMDF V5.2-33 #37976)  
with ESMTP id <01JQMYKH1U4K003MHB@mail.epic1.dep.state.fl.us>; Thu,  
15 Jun 2000 15:53:28 EDT

Received: from deptpa.dep.state.fl.us ([199.73.204.21])  
by mail.epic50.dep.state.fl.us (PMDF V5.2-32 #31508)  
with ESMTP id <01JQMYJ3J3Y8003T4R@mail.epic50.dep.state.fl.us>; Thu,  
15 Jun 2000 15:52:20 -0400 (EDT)

Received: from a1.deptpa.dep.state.fl.us by mail.deptpa.dep.state.fl.us  
(PMDF V5.2-33 #37974) id <01JQMYGA7AYM00088B@mail.deptpa.dep.state.fl.us>;  
Thu, 15 Jun 2000 15:50:04 -0400 (EDT)



RECEIVED

JUL 17 2000

BUREAU OF AIR REGULATION

**WHEELABRATOR RIDGE ENERGY INC.**  
A WASTE MANAGEMENT COMPANY

3131 K-Ville Avenue  
Auburndale, FL 33823  
(863) 665-2255  
(863) 665-0400 Fax

Certified Mail 7000-0520-0014-8793-1144

July 14, 2000

Mr. John Reynolds  
Mail Stop 5505  
Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: Wheelabrator Ridge Energy - Title V Permit No. 1050216-001-AV;  
Modification to PSD Permit AC53-206244 (PSD-FL-183A) and Title V  
Air Operating Permit 1050216-001-AV;  
Construction of High Efficiency Wet Scrubber System for Ash Handling  
Building Ventilation.  
Notice of Publication

Dear Mr. Reynolds:

Attached please find an original and two copies of the proof of publication from the Lakeland Ledger for the Ridge Generating Station draft permit to construct the Ash Handling Building High Efficiency Wet Scrubber.

If you have any questions please contact John Neil at (863) 665-2255 Ext 250.

Sincerely Yours

John N Rivara  
Plant Manager

cc G. Kissel (DEP Southwest District)  
Certified Mail 7000 0520 0014 8793 0741

T. Porter (WESI)

EPA  
NPS  
PCESD

# AFFIDAVIT OF PUBLICATION

## THE LEDGER

### Lakeland, Polk County, Florida

Case No .....

STATE OF FLORIDA)  
COUNTY OF POLK)

Before the undersigned authority personally appeared Nelson Kirkland, who on oath says that he is Classified Advertising Manager of The Ledger, a daily newspaper published at Lakeland in Polk County, Florida; that the attached copy of advertisement, being a

...Public Notice of Intent to Issue PSD Permit.....

in the matter of..... Modification / Revised.....

...Title V Operating Permit... File No. 1050216-004-AC (PSD-FL-183B).....

...and 1050216-005-AV.....

in the.....

Court, was published in said newspaper in the issues of.....

...7-10;2000.....

Affiant further says that said The Ledger is a newspaper published at Lakeland, in said Polk County, Florida, and that the said newspaper has heretofore been continuously published in said Polk County, Florida, daily, and has been entered as second class matter at the post office in Lakeland, in said Polk County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Signed.....  
Nelson Kirkland  
Classified Advertising Manager  
Who is personally known to me.

Sworn to and subscribed before me this 13<sup>th</sup>.....  
day of July..... A.D. 20 00.....

*Jennifer L. Clendening*  
Notary Public



JENNIFER L. CLENDENING

(Seal)  
My Commission Expires 1/10/04.....

76740450

E204

John Neil

### Attach Notice Here

#### PUBLIC NOTICE OF INTENT TO ISSUE PSD PERMIT MODIFICATION/REVISED TITLE V OPERATING PERMIT

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File Nos. 1050216-004-AC (PSD-FL-183B) and 1050216-005-AV

Wheelabrator Ridge Energy, Inc.  
Wet Scrubber for Ash Handling Building  
Polk County

The Department of Environmental Protection (Department) gives notice of its intent to issue a PSD Permit Modification/Revised Title V Air Operation Permit from the Wheelabrator Ridge Energy, Inc. Plant located in Auburndale, Polk County. The applicant's mailing address is: 3131 K-Ville Ave., Auburndale, Florida 33823. A Best Available Control Technology (BACT) Determination revision was not required pursuant to Rule 212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

This facility produces electric power using waste wood and trees for fuel. To enhance employee comfort and safety in the Ash Handling Building, the applicant proposes to install an office-type wet scrubber to remove particulate matter from the building's ventilation system. No other changes are being requested in this modification/revision. Potential emissions of particulate matter from this modification are estimated at 1.0 lb/hour and 4.5 tons/year.

The Department will issue the permit modification/revision with the proposed changes to permit modification/revision unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days for the PSD Permit Modification and 30 (thirty) days for the Revised Title V Air Operation Permit from the date of publication of this Public Notice of Intent to Issue PSD Permit Modification/Revised Title V Air Operation Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Bar Stone Road, Mail Station #5506, Tallahassee, FL 32399-2800. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permits and require, if applicable, another Public Notice.

The Department will issue the permits with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) the name and address of each agency affected and each agency's file or identification number, if known; (b) the name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) a statement of how and when petitioner received notice of the agency action or proposed action; (d) a statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that 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 such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

The following paragraph applies to the Revised Title V Operating Permit:

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7610(d)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661(d)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661(d)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

A complete project file 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  
Suite 4, 111 S. Magnolia Drive  
Tallahassee, Florida, 32301  
Telephone: 850/488-0114  
Fax: 850/922-6979

Polk County Environmental Services  
Department/Natural Resources Division  
4177 Ben Durrance Road  
Bartow, Florida 33820  
Telephone: 863/534-7377  
Fax: 863/534-7374

Department of Environmental Protection  
Southwest District  
3604 Coconut Palm Drive  
Tampa, Florida 33619  
Telephone: 813/744-6100  
Fax: 813/744-6084

The complete project file includes the application, Draft permit modification/revision, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, or the Department's reviewing engineer for this project, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.

E-204 - 7-10, 2000



**WHEELABRATOR RIDGE ENERGY INC.**  
A WASTE MANAGEMENT COMPANY

3131 K-Ville Avenue  
Auburndale, FL 33823  
(863) 665-2255  
(863) 665-0400 Fax

Certified Mail 7000-0520-0014-8793-1113

April 21, 2000

Mr. John Reynolds  
Mail Stop 5505  
Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RECEIVED**

MAY 02 2000

BUREAU OF AIR REGULATION

RE: Wheelabrator Ridge Energy - Title V Permit No. 1050216-001-AV;  
Modification to PSD Permit AC53-206244 (PSD-FL-183A) and Title V  
Air Operating Permit 1050216-001-AV;  
Construction of High Efficiency Wet Scrubber System for Ash Handling  
Building Ventilation.

*1050216-004-AC  
PSD-FL-292*

Dear Mr. Reynolds:

Attached you will find two copies of the Florida Department of Environmental Protection's Form No. 62-210.900(1) "Application for Air Permit - Long Form" for Wheelabrator Ridge Energy. Wheelabrator requests a modification of PSD Permit No. AC53-206244 for the Ridge Generating Station for the construction of a high efficiency wet scrubber system for ventilation of the reconstructed ash handling building. Wheelabrator further requests a modification to Title V Air Operating Permit No. 1050216-001-AV to allow operation of the wet scrubber system. The system is to be installed on the reconstructed ash building to provide ventilation for employee comfort and safety.

Also attached you will find two drawings, one of the proposed location for the scrubber and one of the Tri-Mer Corp high efficiency wet scrubber proposed for installation.

If you have any questions please contact John Neil at (863) 665-2255 Ext 250.

Sincerely Yours

*John N Rivara*  
John N Rivara  
Plant Manager

cc G. Kissel (DEP Southwest District) ✓  
T. Porter (WESI)

*cc: EPA  
NPS  
polk CO  
file*

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 02-Jun-2000 09:38am  
**From:** Gerald Kissel TPA 813/744-6100  
KISSEL\_G@a1.deptpa.dep.state.fl.us  
**Dept:**  
**Tel No:**

**To:** John Reynolds TAL 850/921-9536 ( REYNOLDS\_J@a1 )

**Subject:** Re: Wheelabrator Ridge Energy/Ash Building Scrubber

since this is going to be the precedent case, i wanted to take another look at the language before sending it - i've been out of the office most of this week and haven't gotten to this yet; we'll send it today or Monday



# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 03-May-2000 08:20am  
**From:** Alvaro Linero TAL  
LINERO\_A  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9523

**To:** John Reynolds TAL

( REYNOLDS\_J )

**To:** Kim Tober TAL

( TOBER\_K )

**Subject:** Wheelabrator Ridge

John. You get this one. Work out with Gerry Kissel how to coordinate AC and Title V action so there is only one public notice.

Kim. It looks like they have a Title V permit so no fee is necessary. Work it out with John whether or not copies need to go with EPA. I have nothing to add to any letter to EPA. Send a copy to Polk County and SWD.

Thank you.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 02-May-2000 11:41am  
**From:** Gerald Kissel TPA 813/744-6100  
KISSEL\_G@a1.deptpa.dep.state.fl.us  
**Dept:**  
**Tel No:**

**To:** John Reynolds TAL ( REYNOLDS\_J@A1 )  
**To:** John W. Reynolds TAL ( REYNOLDS\_JW@a1.epic6.dep.state.fl.us )  
**CC:** Alvaro Linero TAL ( LINERO\_A@A1 )

**Subject:** wheel'r app'n (other J Reynolds ignore)

To: John Reynolds cc: Al Linero

On May 1, we recvd a copy of an application dated April 21, submitted to Tall'e by Wheelabrator Ridge for a wet scrubber for the ash bldg. The applicant will be sending you a revised page 4 with the block checked which says that this is also 'a Title V application to be processed concurrently with the AC'. This concurrent processing can get complicated (for us, not for you), but at the least, you can save us some workload by doing a draft and public notice which meets both the AC/PSD requirements AND the Title V requirements. Then you would proceed in your normal process to issue the AC/PSD construction permit, and when we do the subsequent Title V processing, a lot of work will have been saved.

We can e-mail you the draft and public notice language that we've used for this. It may have to be changed a little when a PSD permit is involved.

## Reynolds, John

---

**From:** Linero, Alvaro  
**Sent:** Wednesday, December 20, 2000 2:53 PM  
**To:** Reynolds, John  
**Subject:** FW: Wheelabrator Ridge Energy PSD Mod/Title V Revision

**Sensitivity:** Confidential



D\_RidgeEnergy\_Revi  
sion\_Projec...



D\_RidgeEnergy\_Revi  
sion\_Projec...



D\_RidgeEnergy\_Revi  
sion\_Projec...



D\_RidgeEnergy\_Revi  
sion\_Projec...

John. Can you look this over and let me know what you think? Thanks. Al.

-----Original Message-----

**From:** Quillian, Ann  
**Sent:** Wednesday, December 20, 2000 1:59 PM  
**To:** Linero, Alvaro  
**Cc:** Kissel, Gerald  
**Subject:** Wheelabrator Ridge Energy PSD Mod/Title V Revision  
**Sensitivity:** Confidential

As we discussed recently, please find attached documents for your review regarding the combination PSD Permit Modification (DEP Project 006) and the Revision to the Title V Permit (DEP Project 005) for the Wheelabrator Ridge Energy facility in Polk County.

Jerry has provided the P.E. Certification for these projects. Please let me know any changes that you may have to these documents by December 28, 2000, if at all possible.

The attached electronic files contain the following:

Title V Statement of Basis: 1050216.sob  
Intent to Issue: 1050216i.rev  
DRAFT PSD Modification: 1050216psd.doc  
Revised Draft Title V Revision: 1050216d.rev

Thank you for your assistance.

Ann Quillian, P.E.  
Southwest District

## Reynolds, John

---

**From:** Reynolds, John  
**Sent:** Wednesday, December 20, 2000 3:14 PM  
**To:** Linero, Alvaro  
**Subject:** RE: Wheelabrator Ridge Energy PSD Mod/Title V Revision

**Sensitivity:** Confidential

Al, looks like the proposed changes could be confusing. First, the distinction between wood and wood waste is not clear (actually, all of the wood is waste wood). Secondly, there is no mention of the telephone poles or the Wheelabrator letter requesting the change (the letter should be an attachment to the modification). JR.

-----Original Message-----

**From:** Linero, Alvaro  
**Sent:** Wednesday, December 20, 2000 2:53 PM  
**To:** Reynolds, John  
**Subject:** FW: Wheelabrator Ridge Energy PSD Mod/Title V Revision  
**Sensitivity:** Confidential

John. Can you look this over and let me know what you think? Thanks. Al.

-----Original Message-----

**From:** Quillian, Ann  
**Sent:** Wednesday, December 20, 2000 1:59 PM  
**To:** Linero, Alvaro  
**Cc:** Kissel, Gerald  
**Subject:** Wheelabrator Ridge Energy PSD Mod/Title V Revision  
**Sensitivity:** Confidential

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Revised Draft Title V Revision: 1050216d.rev

Thank you for your assistance.

Ann Quillian, P.E.  
Southwest District