



Wheelabrator Ridge Energy Inc.

A Waste Management Company
3131 K-ville Avenue
Auburndale, FL 33823

Phone 941.665.2255
Fax 941.665.0400

RECEIVED

MAY 18 1999

**BUREAU OF
AIR REGULATION**

Certified Mail Z 075-834-366

May 11, 1999
Mr. John Reynolds
Mail Stop 5505
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Correction to Specific Condition 5; Revised Wheelabrator Ridge Energy - PSD
Permit AC53-206244(PSD-FL-183A) Modified March 31, 1999

Dear Mr Reynolds:

While reviewing the Proposed Title V and the March 31, 1999 modification made to the Wheelabrator Ridge Energy PSD permit I noticed an error in Specific Condition 5 of the PSD Permit.

The line for Be in the table of Specific Condition 5 reads:

| | | | |
|----|--------|-------|---------------------------------|
| Be | 0.0063 | 0.028 | EPA Method 104 if test required |
|----|--------|-------|---------------------------------|

This line should read:

| | | | |
|----|--------|-------|---------------------------------------|
| Be | 0.0063 | 0.028 | EPA Method 29 or 104 if test required |
|----|--------|-------|---------------------------------------|

This correction would make this line consistent with the Mercury (Hg) and Lead (Pb) lines of Specific Condition 5.

If you have any additional questions, please call John Neil at (941) 665-2255 Ext. 250.

Sincerely,

George D. Woodward, P.E.
Plant Manager

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



September 29, 1995

State of Florida
Department of Environmental Protection
Chief Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

OCT 3 1995

Bureau of
Air Regulation

Attn: Mr. Al Linero

Subject: Ridge Generating Station
Air Construction Permit #AC53-206244/PSD-FL-183(A)
Confirmation that Application for Operating Permit is Not
Required/Request for Extension of Construction Permit

Dear Mr. Linero:


This letter is intended to confirm the results of our September 28, 1995 telephone conversation with you. In that call you confirmed that Ridge Generating Station is not required to submit the application for an operating permit at this time. The submittal of this application is referenced in Specific Condition #19 of the subject construction permit. You also indicated that the Department would inform the Facility of any future requirement to submit this application.

Based on discussions with Scott Sheplak and yourself, we understand that FDEP is proposing F.A.C. Rule Number 62-213.420 to automatically extend current air construction permits expiring between September 1, 1995 and November 1, 1996 until the Title V permit applications are submitted in June of 1996. The Ridge Generating Station would be covered by this rule because the current air construction permit expires on December 31, 1995.

Specific Condition #18 of the current permit requires that any request for an extension of the construction permit must be submitted at least 60 days before the expiration of the permit. Since there is uncertainty associated with the timing for a rule change which would automatically extend the expiration date of the construction permit, this letter also serves as a request for an extension of the construction permit expiration date until November 1, 1996.

If this letter is not an accurate representation of our understanding related to the application for an operating permit, or if you have any questions or comments related to our request for an extension of the construction permit, please call Chuck Davis of my staff at (941) 665-2255.

Sincerely,


Rodney Williams
Plant Manager


cc: J. Reynolds
S. Sheplak
M. Killeen

G. Aguinaga
C. Davis

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes

FROM:  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.

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

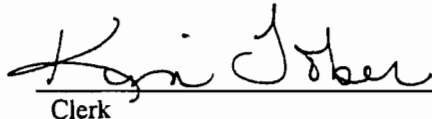
HLR/aal/kw

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. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Rodney Williams, Plant Mgr
Wheelabrator Ridge Energy
3131 K-Ville Avenue
Auburndale, FL 33823

4a. Article Number
2392 979 018

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

7. Date of Delivery
8/16/95

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.

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, Plt. 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>Sept 8/18/95 AC53-206244 PSD FL-183(A) Final Amendment</i> | |



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Werherell
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 ^{16.9}~~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.

Mr. Rodney Williams
 Wheelabrator Ridge, Inc.
 August xx, 1995
 Page 2 of 5

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 | 77.1 | 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.



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 † 72.0 † | 479.2 315.4 |
| 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 xx, 1995
 Page 2 of 5

DRAFT

B. Emissions Limits:

Specific Condition No. 5 is amended as follows:

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|---------------------|----------------|----------------|
| 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 † 72.0 † | 275.9 315.4 |
| 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 xx, 1995
 Page 3 of 5

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~~ ^{RECEIVED} May 5, 1995
- DEP letter dated July 3, 1995
- Wheelabrator letter dated July 17, 1995
- DEP letter dated July 17, 1995

① WHILE IT WAS PROBABLY RECEIVED ON MAY 5, IT IS ACTUALLY DATED APRIL 27, 1995

② CAN CHANGE DATE TO "RECEIVED" OR CHANGE DATE TO APRIL 27, 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

July 24, 1995

RECEIVED

JUL 27 1995

Bureau of
Air Regulation

Mr. A. A. Linero
Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Ridge Generating Station
Permit Number AC53-206244 PSD-FL-183(A)
Proof of Publication

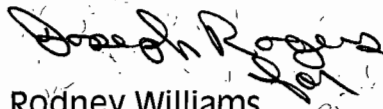
Dear Mr. Linero:

As required by your letter of July 17, 1995, the Facility has published the Department's "Notice of Intent to Issue Permit". The Notice was published in the Lakeland Ledger on Saturday, July 22, 1995. Enclosed is a copy of the Notice, which serves as proof of publication. We will forward the original Affidavit of Publication when it is received from the Ledger.

We look forward to receiving your final authorization to proceed with the interim air pollution limits allowing the Facility to burn up to 16.9 percent tires (40 percent of heat input) with a sulfur dioxide limit of 72 pounds per hour on a 30-day rolling average, following the 14-day period which will end on August 5, 1995.

If there are any questions or concerns regarding this submittal, please contact Chuck Davis at (941) 665-2255.

Sincerely,



Rodney Williams
Plant Manager

/lc

Attachment

cc: C. Davis
M. Killeen
F. Ferraro
W. Ferguson
S. Smallwood (D & M)
J. Rogers

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 2500 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 warrants 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
Suits 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 Regulations, Mail Station 5505, 3600 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.



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;

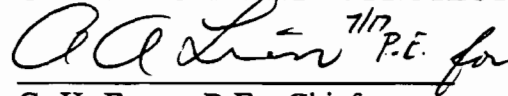
- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) 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

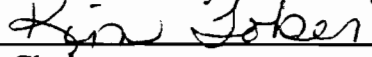
 P.E. for

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.

 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.

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;
- (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 xx, 1995
Page 4 of 5

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

2 392 979 061

4b. Service Type

- Registered Insured
- Certified COD
- Express Mail Return Receipt for Merchandise

7. Date of Delivery

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

5. Signature (Addressee)

6. Signature (Agent)

Linda Colon



Thank you for using Return Receipt Service.

2 392 979 061



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</i> |
| Street and No. | | <i>Wheelabrator Ridge</i> |
| City, State and ZIP Code | | <i>Auburndale, GA</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>7-18-95</i> | |
| <i>AC 53-206244</i> | | |
| <i>PSD-FI-183(A)</i> | | |

Check Sheet

Company Name: Ridge Generating Station
Permit Number: AC 53-206244
PSD Number: PSD-FL-183
Permit Engineer: _____

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Waiver of Department Action
- Department Response
- Other

Blueprint
Cross References:

Intent:

- Intent to Issue *Revised*
- Notice of Intent to Issue "
- Technical Evaluation "
- BACT or LAER Determination "
- Unsigned Permit "

Correspondence with:

- EPA
- Park Services
- Other
- Proof of Publication *Revised*
 - Petitions - (Related to extensions, hearings, etc.)
 - Waiver of Department Action
 - Other

Final

Determination:

- Final Determination
- Signed Permit
- BACT or LAER Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

In the folder labeled as follows there are documents, listed below, which were not reproduced in this electronic file. That folder can be found in one of the file drawers labeled Supplementary Documents Drawer. Folders in that drawer are arranged alphabetically, then by permit number.

Folder Name: Ridge Generation Station

Permit(s) Numbered:

| | | | |
|-----|----|---|--------|
| AC | 53 | - | 206244 |
| PSD | FL | - | 183 |

Period during
which document
was received:

Detailed Description

| | | |
|------------------------------|----|---|
| APPLICATION 20 MARCH 1992 | 1. | 30"x42" XEROX COPY: FLOW DIAGRAM (DRAWING NUMBER: 911000-MPI-010) REVISION D |
|------------------------------|----|---|