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MAR 27 2000

BUREAU OF AIR REGULATION

WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

2600 N.W. 48th Street
Pompano Beach, FL 33073
(954) 971-8701
(954) 971-8703 Fax

March 21, 2000

Certified Mail #Z 239 398 009

Mr. C. H. Fancy, P. E.
Chief Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Wheelabrator North Broward
Ash Handling System Construction Permits

Dear Mr. Fancy:

As per your letter dated February 8, 2000, please find enclosed Wheelabrator North Broward's request to delete the ash handling system requirements from the air construction permit, permit No. AC06-186997. Also enclosed are the professional engineer and responsible official certifications, as well as the Air Construction Permit processing fee of \$250.00.

If there are any questions, or if additional information is required, please contact me at (954) 971-8701.

Sincerely,

William Roberts
Regional Manager

cc: Chuck Faller (with)
Matt Killeen (without)
Tim Porter (without)
Scott Shannon (without)
Jeff Turpin (without)
Wendy Alexander - FDEP - Tallahassee (without)
File: 3.7.3
5.1.3.2

s:000321



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MAR 27 2000

WHEELABRATOR SOUTH BROWARD INC.
A WASTE MANAGEMENT COMPANY

4400 South State Road 7
Ft. Lauderdale, FL 33314
(954) 581-6606
(954) 581-6725 Fax

March 22, 2000

BUREAU OF AIR REGULATION

Certified #Z 126 728 254
Return Receipt Requested

Mr. C. H. Fancy, P.E.
Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Wheelabrator South Broward
Ash Handling System Air Construction Permits

Dear Mr. Fancy:

As per your letter dated February 8, 2000, please find enclosed Wheelabrator South Broward's request to delete the ash handling system requirements from the air construction permit, permit No. AC06-187001. Also enclosed is the professional engineer and responsible official certifications, as well as the Air Construction Permit processing fee of \$250.00.

If there are any questions, or if additional information is required, please contact me at (954) 581-6606.

Sincerely,

Mark Santella
Plant Manager

Enclosures

000322.MS.ch

cc: Wendy Alexander – FDEP – Tallahassee (without)
Jairaj Gosine (with)
Matt Killeen (without)
Tim Porter (without)
Scott Shannon (without)
Jeff Turpin (without)
File: 3.7.3
5.1.3.2



1/25 CA 16-150071
CP: AZ 3 3:22

WHEELABRATOR SOUTH BROWARD INC.
A WASTE MANAGEMENT COMPANY

4400 South State Road 7
Ft. Lauderdale, FL 33314
(954) 581-6606
(954) 581-6705 Fax

January 19, 2000

Certified #Z 126 756 900
Return Receipt Requested

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JAN 24 2000

BUREAU OF AIR REGULATION

Re: Wheelabator South Broward
Ash Handling System Minor Source Permit

Dear Mr. Fancy:

This letter is to clarify the actions taken by Wheelabator South Broward with regard to the dismantling of the permitted ash handling system baghouse minor air pollution source. The source was constructed under permit AC 06-187001 and was issued operating permit AO 06-208864. The baghouse was not needed to control potential ash handling system emissions since ash handling system enclosures and ash conditioning proved to be effective. In June of 1997 Chuck Faller of this office contacted the Southeast District Office to inquire as to what actions this facility need take to dismantle the source. It was Mr. Faller's understanding that a Notice of Asbestos Removal Project form need be completed and notice given to the Department at least ten (10) days prior to dismantling.

The Notice of Asbestos Removal Project was completed on June 24, 1997 and submitted to the FDEP in Tallahassee on March 4, 1999. A copy of that submittal is attached for your reference. The source was dismantled on March 25, 1999. The ash handling building has been sealed at the point of the old baghouse and no emissions are generated at this point.

It should be noted that the ash handling system is regulated under the facility PSD permit. The PSD permit was recently revised to incorporate additional ash handling system emission limits and compliance tests as specified under 40 CFR 60.36b Subpart Cb MWC Emission Guidelines. The dismantled baghouse is not required to comply with these requirements. Given the inclusion of the ash handling system in the PSD permit without a baghouse, we believed that dismantling of the baghouse was tacitly approved. Because of this we commented on the draft Title V permit that the proposed permit conditions for the baghouse had become obsolete and did not need to be incorporated into the final Title V permit.

Mr. C. H. Fancy, P.E., Chief
Page 2 of 2

With the submittal of our comments to the draft Title V permit, Wendy Alexander from the FDEP's Title V section indicated that a modification to the ash handling system baghouse construction permit may have been required prior to dismantling.

Wheelabrator is submitting this letter to request what additional action or information may be required by the Department to expeditiously resolve the ash handling system baghouse issue.

After your review of this letter, please contact me at your earliest convenience at (954) 581-6606 to discuss the appropriate course of action. Thank you for your cooperation in this matter.

Sincerely,



Mark Santella
Plant Manager

000119.MS.ch

Attachments

cc: Jairaj Gosine
 Matt Killeen
 Tim Porter
 Tom Tittle – FDEP – West Palm Beach



Wheelabrator South Broward Inc.

A Waste Management Company
4400 South State Road 7
Ft. Lauderdale, FL 33314

Phone 954 581 6606
Fax 954 581 6705

Thomas D. Kirk
General Manager

March 19, 1999

**Certified #Z 126 756 819
Return Receipt Requested**

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Wheelabrator South Broward
Demolition Notice

Dear Sirs:

Due to a typographical error, the demolition of the South Broward system will be conducted on March 25, 1999, instead of March 24, 1999, as previously reported.

Very truly yours,

Thomas D. Kirk
General Manager

990319.TDK.ch

cc: **Chuck Faller**
Bill Hagne - DNRP
Matt Killeen
Terri Long
Tim Porter



Wheelabrator South Broward Inc.

A Waste Management Company
4400 South State Road 7
Ft. Lauderdale, FL 33314

Phone 954 581 6606
Fax 954 581 6705

Thomas D. Kirk
General Manager

March 4, 1999

Certified #Z 126 756 815
Return Receipt Requested

Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Wheelabrator South Broward
Demolition Notice

Dear Sirs:

Please find attached the Notice of Asbestos Removal Project form for the removal of the ash system vent fabric filter baghouse at the South Broward facility. This minor source is presently permitted under permit no. A006208864. Also included is a report from Becky White, CIH, indicating the lack of asbestos in the source to be demolished.

If there are any questions, or if further information is required, please contact this office at (954) 581-6606, extension 210.

Very truly yours,

Thomas D. Kirk
General Manager

Enclosures

Cc: **Chuck Faller** (with)
Bill Hagne - DNRP (with)
Matt Killeen (without)
Terri Long (without)
Tim Porter (without)



NOTICE OF ASBESTOS REMOVAL PROJECT

TYPE OF NOTICE: Original Revised Cancelled

I. Facility Name WHEELABRATOR SOUTH BROWARD
 Address 4400 SOUTH STATE ROAD 7
 City FT. LAUDERDALE State FLORIDA Zip 33314
 Site ASH SYSTEM FABRIC FILTER BAGHOUSE Surveyed by BECKY WHITE
 Building Size _____ (Square Feet) # of Floors N/A Age in Years 8 Prior Use N/A

II. Fee Receipt Will Be Sent to Address in Block Below: (Print or Type)

<u>N/A</u>	OWNER PROJECT NUMBER
	Fee Check Number <u>N/A</u>
	Other <u>N/A</u>

III. Facility Owner WHEELABRATOR SOUTH BROWARD Phone (954) 581-6606
 Address 4400 S. St. Rd 7
 City Ft. Lauderdale State FL. Zip 33314

IV. Contractor's Name WHEELABRATOR SOUTH BROWARD
 Address 4400 S. St. Rd 7
 City Ft. Lauderdale State FL. Zip 33314
 Phone (954) 99 581-6606 Florida License No.: N/A

V. Demolition Removal Demolition with no ACM Emergency Annual

Removal: Start Date	Finish Date	Demolition: Start Date <u>3/24/99</u>	Finish Date <u>3/24/99</u>
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VI. REMOVAL/DEMOLITION PROCEDURES TO BE USED

<input checked="" type="checkbox"/> Strip & Removal	<input type="checkbox"/> Glove Bag	<input type="checkbox"/> Bulldozer	<input type="checkbox"/> Wrecking Ball
<input type="checkbox"/> Wet Method	<input type="checkbox"/> *Dry Method	<input type="checkbox"/> Explode	<input type="checkbox"/> Burn Down

*MUST OBTAIN PRIOR DEP APPROVAL BEFORE USING A DRY METHOD!

VII. Waste Disposal Site Name N/A Class _____
 Address _____ City _____ State _____

VIII. Fee Calculation & Type of RACM in Renovations or ACM in Demolitions

RACM? (circle Yes or No)
 _____ Square Feet Surfacing Material Yes _____ No _____
 _____ Linear Feet Pipe Yes _____ No _____
 _____ Square Feet Cementitious Material Yes _____ No _____
 _____ Square Feet Resilient Flooring Yes _____ No _____
 _____ Square Feet Asphalt Roofing Yes _____ No _____
 _____ Total RACM (square + linear feet)

IX Asbestos Waste Transporter
Name <u>N/A</u>
Phone (____) _____

X Procedures for Unexpected RACM
<u>N/A</u>

\$ N/A Enclosed (See Fee Schedule) Check if Demolition Only

I certify that the above information is correct.
[Signature] (Signature of Owner/Operator) 3/4/99 (Date)

DEP USE ONLY		
Postmark	NEHAP ... Yes ... No ...	Deposit No.
Fee Received \$	APIS #	Date Received

GRW Consulting Co.

Industrial Hygiene/Safety

July 8, 1997

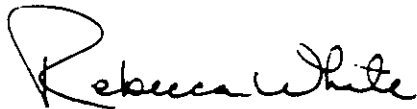
Mr. Chuck Faller
Director, Environmental Health and Safety
Wheelabrator South Broward, Incorporated
4400 South State Road 7
Ft. Lauderdale, Florida 33314

Dear Mr. Faller,

On June 24, 1997, I visually inspected the ash handling dust collector located above the ash conditioner room. Based upon the visual inspection, date of construction (1989), review of the construction specifications and the MSDS' of the insulation and gasket materials, it is felt, with reasonable certainty, that asbestos-containing materials (ACM) are not present in, or on, any part of the dust collector.

I have enclosed the signed copy of the Florida Department of Environmental Protection's Notice of Asbestos Removal Project.

Sincerely,



Rebecca White, CIH, CSP

