



RECEIVED

MAR 24 2000

BUREAU OF AIR REGULATION

WHEELABRATOR SOUTH BROWARD INC.  
A WASTE MANAGEMENT COMPANY

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

March 22, 2000

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

**BEST AVAILABLE COPY**

Wheelabrator Technologies Inc.  
 4 Liberty Lane West  
 Hampton, NH 03842  
 603-929-3000

CHECK NO. - 34594  
 CHECK DATE - 03/21/00

DETACH STATEMENT BEFORE DEPOSITING

STUB 1 OF 1

INVOICE NUMBER	DATE	DESCRIPTION	GROSS AMOUNT	DEDUCTIONS	AMOUNT PAID
030900	030900	MOD. ASH SYS CONST. PERMIT	250.00		250.00
			250.00		250.00

THE FACE OF THIS DOCUMENT CONTAINS SECURITY PRINTING. THE BACK OF THIS DOCUMENT FEATURES SECURITY PRINTING. HOLD AT AN ANGLE TO VIEW.

Wheelabrator Technologies Inc.  
 4 Liberty Lane West  
 Hampton, NH 03842  
 603-929-3000

BANK OF AMERICA  
 COMMERCIAL DISBURSEMENT ACCOUNT  
 NORTHBROOK, IL

70-2328  
 0719

CHECK NUMBER 34594  
 00034594

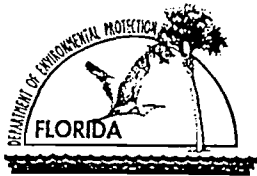
400012      DATE 03/21/00      AMOUNT \$\*\*\*\*\*250.00

PAY TWO HUNDRED FIFTY AND 00/100 \*\*\*\*\*

TO THE ORDER OF  
 FLORIDA DEPT. OF ENVIRONMENTAL PROTECTIO  
 2600 BLAIR STONE ROAD  
 DIRECTOR OF DIVISION OF WASTE MANAGEMENT  
 TALLAHASSEE FL 32393 2400  
 US

BY \_\_\_\_\_ MP  
*Richard T. Felgo*  
 BY \_\_\_\_\_ MP  
 RESCO HOLDINGS, INC.





# Department of Environmental Protection

## Division of Air Resources Management

### APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

#### I. APPLICATION INFORMATION

##### Identification of Facility

1. Facility Owner/Company Name: Wheelabrator South Broward, Inc.	
2. Site Name: Wheelabrator South Broward, Inc.	
3. Facility Identification Number: <span style="float: right;"><input checked="" type="checkbox"/> Unknown</span>	
4. Facility Location: Street Address or Other Locator: 4400 South State Road 7 City: Ft. Lauderdale      County: FL      Zip Code: 33314	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

##### Application Contact

1. Name and Title of Application Contact: Mr. Jairaj Gosine	
2. Application Contact Mailing Address: Organization/Firm: Wheelabrator South Broward, Inc. Street Address: 4400 State Road 7 City: Ft. Lauderdale    State: FL      Zip Code: 33314	
3. Application Contact Telephone Numbers: Telephone: (954) 581 - 6606      Fax: (954) 581 - 6705	

##### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

**Purpose of Application**

**Air Operation Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: \_\_\_\_\_

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: \_\_\_\_\_

Operation permit number to be revised: \_\_\_\_\_

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

Operation permit number to be revised/corrected: \_\_\_\_\_

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: AC187001

Reason for revision: Removal of MAC Filter Model 120 LST 100 baghouse

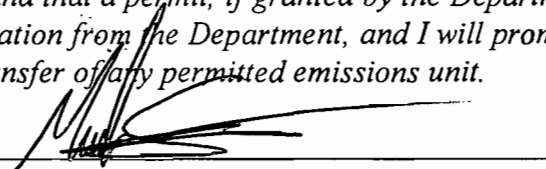
See attached Engineer's Certification & Supplement

**Air Construction Permit Application**

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

**Owner/Authorized Representative or Responsible Official**

1. Name and Title of Owner/Authorized Representative or Responsible Official: Mark Santella
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: Wheelabrator South Broward, Inc. Street Address: 4400 South State Road 7 City: Ft. Lauderdale State: FL Zip Code: 33314
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (954) 581 - 6606 Fax: (954) 581 - 6705
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [✓], if so) or the responsible official (check here [ ], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained<sup>2</sup>so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  Signature  Date 3/21/00

\* Attach letter of authorization if not currently on file.

**Professional Engineer Certification**

1. Professional Engineer Name: Richard G. Smith, PE Registration Number: 39089
2. Professional Engineer Mailing Address: Organization/Firm: ARCADIS Geraghty & Miller, Inc. Street Address: 14497 No. Dale Mabry Hwy., Suite 115 City: Tampa State: FL Zip Code: 33618
3. Professional Engineer Telephone Numbers: Telephone: (813) 961 - 1921 Fax: (813) 963 - 1447

4. Professional Engineer Statement:

*I, the undersigned, hereby certify, except as particularly noted herein\*, that:*

*(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and*

*(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.*

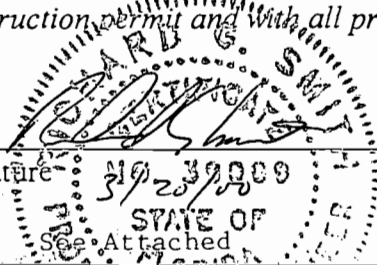
*If the purpose of this application is to obtain a Title V source air operation permit (check here [  ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.*

*If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [  ], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.*

*If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [  ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.*

Signature

(seal)



Date


*March 20, 2000*

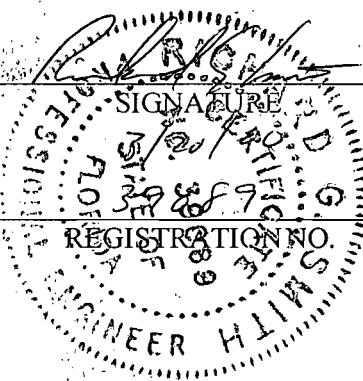
\* Attach any exception to certification statement.

**Attachment to Professional Engineer Statement**  
**[DEP Form No. 62-210.900(1)]**

I, the undersigned, hereby certify that:

1. An inspection of the Ash Handling System as described in Permit No. AC187001 has been conducted to determine if the process is a particulate matter emission source.
2. The ash handling system combines the ash from several locations including the scrubber, furnace bottom ash (wet), and baghouse flyash resulting in a final mixture containing approximately 20% moisture. The mixture is fed into a conditioning system and the pellitized ash is loaded into trucks for disposal.
3. That none of the ash handling activities including the transfer equipment, pellitizer and truck loading station generate a visible particulate emission.
4. The wet processing of the flyash material suppresses the release of particulate emissions and no visible particulate emissions are apparent, and therefore, a baghouse or similar device is not necessary for the Ash Handling System.

  
\_\_\_\_\_  
SIGNATURE

  
\_\_\_\_\_  
REGISTRATION NO.

The seal is circular with a dotted border. The text inside the seal includes "PROFESSIONAL ENGINEER", "STATE OF NEW YORK", "SMITH", and "39889".

March 20, 2000  
DATE

(seal)

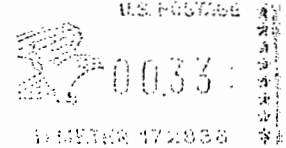


**WHEELABRATOR SOUTH BROWARD INC.**  
A WASTE MANAGEMENT COMPANY

4400 South State Road 7  
Ft. Lauderdale, FL 33314



A



**Wendy Alexander**  
**Florida Department of Environmental Protection**  
**Twin Towers office Building**  
**2600 Blair Stone Road**  
**Tallahassee, FL 32399-2400**

32399-6542 01







**WHEELABRATOR SOUTH BROWARD INC.**  
A WASTE MANAGEMENT COMPANY

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

December 16 1999

**Certified #Z 126 728 520**  
**Return Receipt Requested**

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**RECEIVED**

**DEC 20 1999**

**BUREAU OF AIR REGULATION**

Re: Draft Title V Permit No. 0112119-002-AV  
Wheelabrator South Broward

Dear Mr. Sheplak:

Below are Wheelabrator South Broward's comments to draft Title V, Permit No. 0112119-002-AV:

- 1) Timing of Permit Issuance- We believe it would be more effective to delay issuance of the final Title V permit until after the effective date of the Subpart Cb requirements and after the Power Plant Siting Certification is modified to incorporate the latest PSD permit revisions (PSD-FL-105(B)). This would greatly simplify the permit by eliminating the current 2 tier structure of the proposed Title V permit for pre and post Subpart Cb retrofit requirements (Subsections "A" and "B" General Conditions) and avoid a near future amendment to reflect the PPSC modifications that are currently in progress.
- 2) Page 5 Permitting Note- Subsection A conditions should remain in effect until the retrofit is complete and *initial performance tests* are completed. Also Beryllium NESHAPS should not be referenced. See next comment.
- 3) A.1, A.9, A.21 and A.22 - Beryllium NESHAPS- 40 CFR 61 Subpart C is not applicable to the facility because the facility does not accept Beryllium containing wastes generated by any of the Subpart C regulated sources (extraction plants, ceramic plants, foundries, and propellant plants which process beryllium or beryllium compounds). It was not EPA's intent to regulate MWCs under this NESHAPS as stated in the preamble to Subpart C.
- 4) A.30 - 40 CFR 60.11(d) is a general NSPS requirement that applies only to the Subpart E and Subpart Db particulate limits.

Mr. Scott M. Sheplak, P.E.

Page 2 of 5

- 5) A.36- A.42; The 40 CFR 60.13 general NSPS CEM requirements do not apply until Subpart Cb requirements become effective. There are no NSPS CEM requirements under subparts E and Db.
- 6) A.43- Footnote 2 should specify also that a 1 hour continuous average constitutes 1 test run. Footnote 3 should apply to Method 7 not 7E.
- 7) A.44- The test method for VOC should be EPA Method 25A which has been used in all annual performance tests to date. Method 25A provides a continuous total hydrocarbon measurement and is best suited for MWCs using a heterogeneous fuel. Method 18 is for specific hydrocarbons using GC/FID, requires multiple calibration standards and is not a continuous measurement.
- 8) A.48- The fugitive ash requirements are for Subpart Cb which do not become effective until after initial Subpart Cb performance tests are completed.
- 9) A.49- A .59 : These conditions reference the general NSPS requirements and therefore apply only to the applicable Subpart E and Db limits.
- 10) A. 62 is not applicable. See comment 3 above.
- 11) A.63 is not applicable since there are no limits based at 50 % excess air.
- 12) A.69 correct reference is PSD-FL-105 (B).
- 13) Subsection B emission unit description- 2nd full paragraph exit temperature limit of < 300 deg F should be eliminated. It will be replaced by the Subpart Cb temperature limit tied to annual dioxin performance tests.
- 14) Permitting Notes and B.1 and B.2 : 40 CFR 61, Subpart C Beryllium is not applicable. See comment 3 above.
- 15) B.10- Paragraphs (b) (1) and (2) do not apply. These conditions describe the method for determining whether a MWC unit is large or small (greater than 250 tpd) for regulations under Subparts Eb and Cb. Since the South Broward facility is already subject to Subpart Cb these conditions are not applicable.
- 16) B.19- Paragraph (3): Currently CO and O2 are monitored downstream of the combustor outlet at the fabric filter exit. This alternative location has been approved by EPA as technically equivalent to meet Subpart Eb/Cb requirements provided that O2 is measured at the same location.

- 17) B.36- The reference to Condition A.53 is an error and can be deleted. Reference to specific condition A.50 should be changed to B.67 since B.67 is the correct reference for performance testing.
- 18) B.38- Beryllium lb/mmBtu emission limit was changed to 0.001 mg/dscm @ 7% O<sub>2</sub> equivalent limit in latest PSD revision PSD-FL-105(B).
- 19) B.39 and B.40- NESHAPS Beryllium limit should not be applicable per comment 3 above.
- 20) B.41 and B.42- Fluoride limit should be expressed as 4.454 mg/dscm @7% O<sub>2</sub> consistent with other concentration based limits. Applicable requirement reference should be PSD-FL-105(B). PA 85-21 VOC and sulfuric acid mist lb/MMBtu limits should be converted to 22 ppm @ 7% O<sub>2</sub> and 13 ppm @ 7% O<sub>2</sub> equivalent limits respectively for compliance purposes. Equivalent limits are calculated using the EPA Method 19 F-Factor of 9570.
- 21) B.45- Paragraph (1), first sentence should read: " ...the standards under 40 CFR 60 **Subpart Cb** apply at all times except during periods...".
- 22) B.48 - 40 CFR 60 subparts Eb/Cb have modified Rule 62-210-700(1) in that startup/shutdown or malfunction events shall not exceed 3 hours in duration. More importantly, Rule 62-210-700(1) cannot apply to excess emissions of CO, SO<sub>2</sub> and NO<sub>x</sub> since excess emissions under Subpart Cb and PSD-FL-105(B) are defined by averaging times longer than 2 hours.
- 23) B.64- In Paragraph (5) (iii) the 7 ng/dscm limit for the reduced dioxin testing schedule is changed to 15 ng/dscm per condition B.63 and 40 CFR 60.38b(b).
- 24) B.69- This condition can be eliminated since the Subpart C Beryllium NESHAPS is not applicable to the facility. Otherwise Method 29 is already approved in lieu of Methods 103 or 104 for Beryllium testing per Condition B.68.
- 25) B.71- The appropriate test method for VOC is Method 25A which provides continuous total hydrocarbon data. See comment 7. This condition should not be federally enforceable as with all other PA 85-21 requirements.
- 26) B.72- This condition should not be federally enforceable as with all other PPSC conditions under PA 85-21.

- 27) B. 82- This condition can be eliminated since it is no longer required by the recently approved PSD modifications under PSD-FL-105(B). For the same reason appendix EFF can also be eliminated.
- 28) B. 83- Subpart Cb only requires that SO<sub>2</sub> monitors be located upstream of the acid gas control device (inlet to scrubbers) if compliance with the SO<sub>2</sub> limit will be demonstrated using the alternative SO<sub>2</sub> % reduction criterion. If compliance is to be demonstrated on the outlet concentration only, then only SO<sub>2</sub> monitors located downstream of the fabric filter are required. Condition B. 83 should be modified to only require inlet SO<sub>2</sub> monitors if the % reduction option will be used. Last sentence suggested language would be as follows: " SO<sub>2</sub> monitors shall be located downstream of the baghouse if compliance will be determined on a concentration basis or upstream of the scrubbers and downstream of the baghouse if compliance will be determined using % reduction. "
- 29) Reporting and Record Keeping Requirements-There are conflicts in the reporting requirements. Conditions B.96, B.97 and B.111 specify the submittal of excess emission reports on a calendar quarter basis within 30 days after the last month in the quarter and in the format specified in 40 CFR 60.7. Subpart Cb requires submittal of annual and semiannual reports by February 1 and August 1 with specific contents specified under Conditions B.103 and B. 104. Given that the PSD permit has been revised to incorporate the Subpart Cb limits and operating requirements, the two different reporting requirements should be streamlined into a single reporting requirement based on Subpart Cb. Also condition B.111 references Rule 62-204-800(8) as a basis for submittal of quarterly reports. Since this rule has a direct reference to Subpart Cb, there is no quarterly excess emission submittal requirement but an annual and semiannual requirement.
- 30) B.112- Paragraph (b) specifies submittal of test reports no later than 45 days after test completion. This 45 day requirement cannot be met given the dioxin test requirements under Subpart Cb. Dioxin analyses take approximately 30 days to complete after receipt of samples given the inherent complexity of the analysis, detailed QA/QC review of the lab data packages and short supply of qualified labs that can perform high resolution GC/MS analysis. A 60 day test report submittal date would minimize enforcement exposure to late test reports.
- 31) Subsection C- Emissions Unit 005, the MAC Filter baghouse (Model 120 LST100) is no longer in operation and has been dismantled following DEP notification. The baghouse proved unnecessary in controlling fugitive fly ash since building enclosures and ash conditioning proved to be effective by themselves. Fugitive emissions from the ash handling system will be regulated by the Subpart Cb fugitive ash emission standard under condition B.36 (40 CFR 60.36b and 40 CFR 60.55b).
- 32) Condition C.1(2)- Based on Comment 28, the PTE parameters for ash handling system are no longer required since there is no discrete emission point.

Mr. Scott M. Sheplak, P.E.  
Page 5 of 5

- 33) Conditions C.4, C.5 and C.6- Language relating to the ash handling system can be deleted based on comment 28 above.
- 34) Table 1-1 Summary of Air Pollutant Standards and Terms- Standards for Be and Fl for all units should be expressed in mg/dscm at 7% O2 per PSD-FL-105(B) and comment 19 above.
- 35) Table 2-1 Summary of Compliance Requirements- Test method corrections are as follows: VE = Method 9, PM, PM10 = Method 5, Hg and Pb = Method 29 only ( Cannot use M-12 or 101A under Subpart Cb), Be = Method 29 only per comment 24 above. Lime silo Method 5 is only conducted at request of DEP should opacity exceed 5%. There is no defacto annual Method 5 test requirement. Ash handling system should be Method 22 under the Subpart Cb fugitive ash standard. Note 2 correct reference to reduced dioxin test schedule is 40 CFR 60.38b(b).
- 36) Appendix H-1 Permit History- PSD-FL-105(B) should be incorporated in table.

Sincerely,

*William F. Buckley*

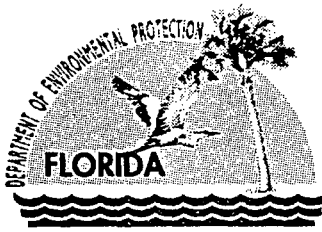
-for

Mark Santella  
Plant Manager

991216.MS.ch

cc: Jairaj Gosine  
Matt Killeen  
Tim Porter  
Jeff Turpin  
Scott Shannon  
File: 3.7.3  
5.1.3.2

12/



# Department of Environmental Protection

Jeb Bush  
Governor

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

David B. Struhs  
Secretary

May 15, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. William Roberts  
General Manager  
Wheelabrator South Broward Inc.  
4400 South State Road 7  
Ft. Lauderdale, Florida 33314

Re: Request for Additional Information on Permission to Burn Canker Waste Material

Dear Mr. Roberts:

The Department has received your request dated April 17, 2002 for permission to burn waste associated with the Department of Agriculture and Consumer Services Citrus Canker Eradication Program

After further review of your request, we have determined that this type of waste material does not fall under the intent of condition B.15.(6)(h) of your Title V permit. The Department does not consider citrus canker waste to be substantially similar to materials found in municipal solid waste. In order to properly evaluate your request, we require additional information.

Please provide an application for a Title V permit revision which includes the certifications by the responsible official and a professional engineer registered in Florida, an estimate of the quantity of waste per delivery to the facility and the estimated number of deliveries per month, a description of how the waste will be handled at the resource recovery facility, a description of the type of wastes to be accepted along with the description of any materials applied to the waste, and an estimate of the emissions produced from the combustion of these materials.

When all of the requested information has been received, we will be able to begin processing your request. If you should have any questions, please call Edward J. Svec at 850/921-8985.

Sincerely,

Scott M. Sheplak, P.E.  
Administrator  
Title V Section

cc:

C. H. Fancy, DEP BAR  
Tom Tittle, DEP SED  
Daniela Banu, Broward County DPEP

*Mailed 5/15/02*  
*cc: Ed Svec*  
*Reading file*

"More Protection, Less Process"

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. William Roberts  
 General Manager  
 Wheelabrator South Broward, Inc.  
 4400 South State Road 7  
 Ft. Lauderdale, Florida 33314

2. Article Number (Copy from service label)

7000 0520 0020 9371 2967

Form 3811, July 1999

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

B. Date of Delivery

5/17

C. Signature  
X *B. Rivera*

- Agent  
 Addressee

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

Mr. William Roberts, General Manager

7000 0520 0020 9371 2967

Postage \$

Certified Fee

Return Receipt Fee (Endorsement Required)

Restricted Delivery Fee (Endorsement Required)

Total Postage & Fees \$

Postmark Here

Recipient's Name (Please Print Clearly) (To be completed by mailer)

Mr. William Roberts, General Manager

Street, Apt. No., or PO Box No.

4400 South State Road

City, State, ZIP+4

Ft. Lauderdale, Florida 33314

PS Form 3800, February 2000

See Reverse for Instructions



**Wheelabrator South Broward Inc.**

A Waste Management Company

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

**RECEIVED**

**APR 23 2002**

**BUREAU OF AIR REGULATION**

**Certified #7001 1940 0006 1766 6792**

**Return Receipt Requested**

April 17, 2002

Mr. Scott M. Sheplak P.E.  
Administrator, Title V Section  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Wheelabrator South Broward  
Title V Permit No: 0112119-002-AV  
Request for Permission to Burn Citrus Canker Waste Material

Dear Mr. Sheplak:

The Florida Department of Agriculture and Consumer Services requested that our facility be one of the designated sites to incinerate waste associated with their Citrus Canker Eradication Program. The special permit request is attached to this letter.

The facility is requesting permission to accept this fuel under the condition specified under B.15 (6) (h) in our Title V permit. The condition states "Waste materials generated by manufacturing, industrial or agricultural activities, provided that these items or materials are substantially similar to items or materials that are found routinely in MSW, subject to prior approval of the Department."

If there are any questions, or if further information is required, please feel free to contact this office (954) 581-6606.

Sincerely,

William Roberts  
General Manager

Attachment

020417a.WB.ch

cc: Jairaj Gosine (w/enclosure)  
Matt Killeen  
Timothy Porter  
File: 5.1.3.2





**CITRUS CANCKER ERADICATION PROGRAM**

**SPECIAL PERMIT - DISPOSAL SITE**

Section 581.031(17), F. S.

The holder of this Permit Wheelabrator South Broward Inc  
is authorized to receive the regulated material described below, from the property of origin to the  
designated below, for further handling or disposal under the authority of Section 581.031(17),  
F.S., and Rule Chapter 5B-58, F.A.C.

Type of Material Citrus

Property of Origin Any

Designated Destination (Property Legal Description): 4400 S State RD 7  
County: Broward

Property Owner's Signature \_\_\_\_\_

Phone #: \_\_\_\_\_  
(954) 581-6606

Inspector's Comments: \_\_\_\_\_

4/2/02  
Date

Heydrick Rodriguez  
Approved by

DUS  
Title

**NOTE:**

1. All material transported is to be secured with a full cover to prevent loss of material and/or debris in route to designated area.
2. Authorization must be obtained prior to burning any material. Contact Local Division of Forestry Office for information.
3. This Permit remains the property of the Issuing Agency and it is subject to revocation at any time.

DACS-08126 Revised 6/99

Barbara / File



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400  
Certified Mail -- Return Receipt Requested

David B. Struhs  
Secretary

August 22, 2000

Mr. Mark Santella  
Plant Manager  
Wheelabrator South Broward, Inc.  
4400 South State Road 7  
Fort Lauderdale, FL 33314

Re: DEP File No. 0112119-004-AC, PSD-FL-105C  
Modification to Permit No. PSD-FL-105B  
Wheelabrator South Broward

Dear Mr. Santella:

We are in receipt of your request for a minor modification to the referenced facility PSD permit for the construction of two minor source wet scrubbers dated July 24, 2000, and received by the Department on July 27, 2000. However, we must deem your application incomplete due to the following reasons:

1. Please submit you application using the proper Department form No. 62-210.900(1). The form is available on the Department's Internet web site: [www.dep.state.fl/air](http://www.dep.state.fl/air).
2. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please ensure that the completed application is so certified.

Please also note that we are advising applicants that Rule 62-4.055(1), F.A.C. requires a response to requests for information within 90 days. When we receive the above mentioned items, we will continue processing your application. If you have questions, please contact Tom Cascio at 850/921-9526.

Sincerely,

Scott M. Sheplak, P.E.  
Administrator  
Title V Section

cc: Jarrett Mack, Broward County  
Isidore Goldman, SE District

"More Protection, Less Process"

Printed on recycled paper.

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- Complete items 1 and/or 2 for additional services.
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- Print your name and address on the reverse of this form so that we can return this card to you.
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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:

Mr. Mark Santella  
 Wheelabrator South Broward, Inc.  
 4400 S. State Rd. 7  
 Fort Lauderdale, FL 33314

4a. Article Number

P 265 657 775

4b. Service Type

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

7. Date of Delivery

8/28

5. Received By: (Print Name)

Carlos Duarte

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

6. Signature: (Addressee or Agent)

X Duarte

PS Form 3811, December 1994

102595-97-B-0179

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P 265 657 775

US Postal Service

**Receipt for Certified Mail**

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Mr. Mark Santella  
 Wheelabrator South Broward, Inc.  
 4400 S. State Rd. 7  
 Fort Lauderdale, FL 33314

PS Form 3800, April 1995

Certified Fee	
Special Delivery Fee	
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# INTEROFFICE MEMORANDUM

*-file-*  
e-mail receipt  
of comments

**Date:** 08-Aug-2000 09:35am

**From:** jgosine  
jgosine@wm.com

**Dept:**

**Tel No:**

**To:** Scott.sheplak ( Scott.sheplak@dep.state.fl.us )  
**CC:** msantella ( msantella@wm.com )  
**CC:** mkilleen ( mkilleen@wm.com )

**Subject:** Wheelabrator South Broward's Comments to Revised Draft Title V permit # 0112119-002-AV

Attached to this e-mail is a letter summarizing Wheelabrator South Broward's Comments to Revised Draft Title V permit # 0112119-002-AV that was published in the Sun Sentinel on July 9, 2000. A hard copy of the letter will be mailed to you today.

(See attached file: Draft Tittle V Comments (2nd Draft) - SB.doc)



RECEIVED

AUG 11 2000

BUREAU OF AIR REGULATION

**WHEELABRATOR SOUTH BROWARD INC.**  
A WASTE MANAGEMENT COMPANY

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

**Certified #Z 126 728 316**  
**Return Receipt Requested**

August 7, 2000

Mr. Scott M. Sheplak P.E.  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Re: Wheelabrator South Broward  
Comments to Draft Title V Permit

Dear Mr. Sheplak:

Below are Wheelabrator South Broward's comments to Revised Draft Title V permit No. 0112119-002-AV that was published in the Sun Sentinel on July 9, 2000:

1) Page 30, B.11 Capacity- Paragraph (b) is not applicable. Municipal waste combustor operating capacity defined under 40 CFR 60.51b specifically excludes MWCs constructed before September 20, 1994.

2) Page 38, Emission Limitations and Standards- Permitting Note: Last sentence of permitting note should reference PSD -FL- 105(B).

3) Pages 38-40, Condition B.34: This condition should only reference 40 CFR 60.33b as basis for limit consistent with other Cb limits incorporated into PSD FL-105(B).

4) Page 42, Condition B.44: Condition 44 limits excess opacity emissions to 2 hours in a 24-hour period. This is inconsistent with Condition B.47 which allows excess emissions for 3 hours in a 24 hour period.

5) Page 55, Condition B.78; Condition 78 should be modified since the requirement to calculate a 12% CO<sub>2</sub> F-Factor was deleted in PSD-FL-105 (B) when lb/mmbtu limits were changed to concentration based limits. Compliance with emission limit in lb/mmbtu (see condition B.39) should be based on the EPA F-Factor of 9570 dscf/mmbtu from 40 CFR 60 Appendix A, Method 19. This F-Factor was used to convert Subpart Cb limits to equivalent lb/mmbtu values in PSD FL-105 (B).

6) Page 55, Condition B.79: Condition 1.d.(3) of PSD FL-112(B), the basis for Condition B.79, was added to the PSD to reflect the incorporation of the Cb requirements and therefore was to provide the same monitoring flexibility that Subpart Cb allows. Consequently, the location of SO<sub>2</sub> monitors upstream of scrubber would not be required if SO<sub>2</sub> removal efficiency would not be used for determining compliance with the alternative removal limit. Furthermore, SO<sub>2</sub> monitors are not required under Specific Condition 9 of PSD FL-105 (B), which specifies the

Mr. Scott M. Sheplak P.E.

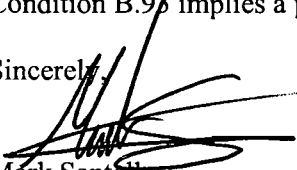
Page 2 of 2

PSD continuous monitoring requirements. PSD specific condition 9 was inexplicably left out of the Title V permit. PSD Condition 9 should be incorporated in the Title V permit to preserve the option for omitting SO2 monitors upstream of the scrubber. It was our intent under PSD FL-105 (B), which incorporated the Subpart Cb requirements to make the inlet SO2 monitors optional (as Cb allows) which we thought was done.

7) Page 41, Permitting Note: The equivalent emissions were calculated using an F-Factor of 14,389 dscf/mmbtu at 7% O2 and not 15,239 dscf/mmbtu at 7%O2. The 14.439 dscf/mmbtu F-Factor is based on the EPA Method 19 F-Factor of 9570 dscf/mmbtu converted to 7%O2.

8) Page 58, Condition B.92, paragraph (6): The SO2 limit under Condition B.31 specifies a concentration limit or % removal while there is no maximum ppm limit for SO2. Paragraph (6) of Condition B.92 implies a ppm limit only for SO2 and this should be clarified.

Sincerely,

  
Mark Santella  
Plant Manager

000807.MS.ch

Enclosures

cc:     Jairaj Gosine  
          Matt Killeen  
          Timothy Porter  
          Scott Shannon  
          File: 3.7.3  
          File: 5.1.3.2

8/14/00 cc: *Wendy Alexander*  
*Scott Sheplak*



**WHEELABRATOR SOUTH BROWARD INC.**  
 A WASTE MANAGEMENT COMPANY  
 4400 South State Road 7  
 Ft. Lauderdale, FL 33314



**CERTIFIED**

Z 126 728 316

ISS#406 FT LAUDERDALE FL 333 08-09-00 10:11

**MAIL**

A

Mr. Scott M. Sheplak P.E.  
 Florida Department of Environmental Protection  
 Twin Towers Office Building  
 2600 Blair Stone Road  
 Tallahassee, FL 32399-2400

32399-6542 01





RECEIVED

JUN 22 2000

BUREAU OF AIR REGULATION

WHEELABRATOR SOUTH BROWARD INC.  
A WASTE MANAGEMENT COMPANY

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

June 8, 2000

**Certified #Z 126 728 303**  
**Return Receipt Requested**

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, FL 32301

Re: Wheelabrator South Broward  
Draft Title V Permit

Dear Mr. Sheplak:

Wheelabrator South Broward is formally requesting a change to the requirements contained in Rule 62-210.700(1), F.A.C. The current requirement in this section reads:

*"Excess emissions resulting from start-up, shutdown, or malfunction of any emissions units shall be permitted provided (1) best operational practices to minimize emissions are adhered to, and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours on any 24-hour period unless specifically authorized by the Department for longer duration."*

The Emissions guidelines for large MWCs, promulgated as 40 CFR 60 Subpart Cb, and adopted as Rule 62-204.800(8) (b), F.A.C., has significantly increased the stringency of the standards applied to the facility and increased the complexity of the control equipment. This is discussed in the EPA Background Information Documents and the Emissions Guidelines, which specifically allow for three hours of excess emissions in any 24-hour period during start-ups, shutdowns and malfunctions.

The facility's current Power Plant Siting Certification (PA 85-21) is being modified by the FDEP. While the current PPSC does contain the two hour notification requirement, Section XII.B. of the proposed modified PPSC reads:

[Faint, illegible text from the proposed modified PPSC]

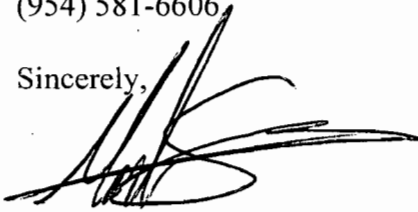


Mr. Scott M. Sheplak, P.E.  
Page 2 of 2

*"This certification shall be automatically modified to conform to any subsequent amendments, modifications, or renewals made by DEP under a federally or approved program to any separately issued Prevention of Significant Deterioration (PSD) permit, Title V Air Permit, or National Pollutant Discharge Elimination System (NPDES) permit for the certified facility."*

If there are any questions, or if further information is required, I may be contacted at (954) 581-6606.

Sincerely,



Mark Santella  
Plant Manager

000608.MS.ch

cc: Jairaj Gosine  
Matt Killeen  
Tim Porter  
William Roberts  
File: 3.7.3  
5.1.3.2

6/23/00 cc: Scott Sheplak  
Wendy Alexander

**CERTIFIED**



**WHEELABRATOR SOUTH BROWARD INC.**  
A WASTE MANAGEMENT COMPANY

4400 South State Road 7  
Ft. Lauderdale, FL 33314

Z 126 728 304

155#405 FT LAUDERDALE FL 333 06-20-00 10:15

**MAIL**

A

Mr. Scott M. Sheplak  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

32399X2400



**CERTIFIED**



**WHEELABRATOR SOUTH BROWARD INC.**  
A WASTE MANAGEMENT COMPANY

4400 South State Road 7  
Fr. Lauderdale, FL 33314

Z 126 728 303

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Mr. Scott M. Sheplak,  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, FL 32301

HMR  
6/13  
01

32301-2956 18



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*Mr. Brett M. Sheplak, P.E.*  
*FDEP*  
*Bureau of Air Regulation*  
*111 South Magnolia St.*  
*Suite 4*  
*Tallahassee, FL 32301*

4a. Article Number  
*Z 126 728 303*

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

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6. Signature: (Addressee or Agent)  
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118

File -



**WHEELABRATOR SOUTH BROWARD INC.**  
A WASTE MANAGEMENT COMPANY

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

FAX COVER SHEET

DATE: 6/21/00

PLEASE DELIVER AS SOON AS POSSIBLE TO:

NAME: Wendy Alexander

FROM: Chuck Fuller

FAX #: (954) 581-6705

NUMBER OF PAGES INCLUDING COVER SHEET: 3

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IF YOU HAVE PROBLEMS RECEIVING THIS FAX  
PLEASE CALL (954) 581-6606



**WHEELABRATOR SOUTH BROWARD INC.**  
A WASTE MANAGEMENT COMPANY

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

June 8, 2000

**Certified #Z 126 728 303**  
**Return Receipt Requested**

Mr. Scott M. Sheplak, P.E.  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
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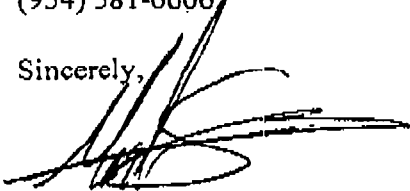
Mr. Scott M. Sheplak, P.E.

Page 2 of 2

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Plant Manager

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cc: Jairaj Gosine  
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File: 3.7.3  
5.1.3.2