



**Wheelabrator South Broward Inc.**

A Waste Management Company

4400 South State Road 7  
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(954) 581-6606  
(954) 581-6705 Fax

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SEP 21 2001

BUREAU OF AIR REGULATION

September 18, 2001

**Certified #7000 1530 0001 5735 0401**  
**Return Receipt Requested**

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

Re: Wheelabrator South Broward  
Final Comments for PPSC Modifications – 08/05/01  
PA 85-21 (DEP CASE NO. PA 85-21D).

Dear Mr. Fancy:

Please find attached South Broward's final comments to the FDEP modifications on 08/05/01 to the conditions of certifications for the Power Plant Siting Certification, PA 85-21 (DEP CASE NO. PA 85-21D).

If there are any questions, please contact this office at (954) 581-6606.

Sincerely,

William B. Roberts  
General Manager

010918.WBR.ch

Attachment

cc: Jairaj Gosine (with attachment)  
Matt Killeen (w/o attachment)  
Tim Porter (with attachment)  
File: 3.7.3  
5.1.3.2



Waste Management, Inc.

## Final Comments to PPSC Modifications of August 5, 2001

On August 5, 2001, the facility conditions of certifications for the Power Plant Siting Certification, PA 85 21 were modified by the FDEP (DEP CASE NO. PA 85-21D). Notwithstanding the final PPSC modifications, the PPSC still contains some errors and omissions that need to be addressed as noted below.

1. The chart on top of Page 4 of the PPSC modification issued on 08/05/01, references North Broward's boilers and maximum firing rates. This chart needs to be replaced with the correct chart for South Broward's boilers as shown below:

Emissions Unit No.	Emissions Unit Description
001	323.6 MMBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners – Unit #1
002	323.6 MMBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners – Unit #2
003	323.6 MMBtu/hr (maximum) Municipal Waste Combustor & Auxiliary Burners – Unit #3

The permitting note should read as follows:

{Permitting note: Each of the three municipal waste combustors (MWC's) has a nominal design rate capacity of 750 ton MSW per day (a maximum of 863 ton per day), 281 MMBtu per hour with MSW having a heating value of 4,500 Btu per pound. Short term capacity is limited by limiting steam production (maximum of 192,000 lb/hr), which effectively limits heat input.}

2. Condition XIV 1.a. e. (3) on Page 19 of the August 1, 2000, modifications- The references to "oxygen measurements", "pressure and temperature" and carbon injection system operating parameters, temperature of the combustion zone, slake lime utilization and power utilization" should have been removed to make South Broward's PPSC consistent with the North Broward PPSC revision and the final PSD permit revisions of both facilities. The facility requests the correction of this condition in the PPSC.
3. Condition XIV. D. on Page 30 of the August 1, 2000, modifications references a condition that does not exist in the present South Broward PPSC, any South Broward revision, the North Broward PPSC, any North Broward PPSC revision or the final North or South Broward PSD permit revisions. Nor is the condition contained in the Title V operating permit. The facility requests the deletion of this condition from the PPSC.
4. Condition XIV. E. on Page 30 of the August 1, 2000, modifications references a condition that does not exist in the present South Broward PPSC, any South Broward revision, the North Broward PPSC, any North Broward PPSC revision or the final North or South Broward PSD permit revisions. Nor is the condition contained in the Title V operating permit. The facility requests the deletion of this condition from the PPSC.