



WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

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

08 June, 2000

CERTIFIED MAIL # Z 239 398 029

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

RECEIVED

JUN 23 2000

BUREAU OF AIR REGULATION

Re: Wheelabrator North Broward
Draft Title V permit

Dear Mr. Sheplak:

Wheelabrator North 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 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 86-22) 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:

"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) 971-8701.

Sincerely,

William Roberts
Regional Manager

cc: Chuck Faller
Tim Porter
Matt Killeen
File: 3.7.3
5.1.3.2

s: 060800

RECEIVED

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

Wheelabrator Technologies Inc.

4 Liberty Lane West
Hampton, NH 03842
603-929-3000

CHECK NO. - 32935

CHECK DATE - 03/14/00

DETACH STATEMENT BEFORE DEPOSITING

STUB 1 OF 1

INVOICE NUMBER	DATE	DESCRIPTION	GROSS AMOUNT	DEDUCTIONS	AMOUNT PAID
031000	031000		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 32935

00032935

DATE

AMOUNT

185973 03/14/00 \$*****250.00

PAY

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

TO THE ORDER OF

FL DEPT ENVIRONMENTAL PROTECT
2600 BLAIR STONE ROAD
TALLAHASSEE FL 32399-2410
US

BY _____ MP

Richard T. Kellogg
BY _____ MP
RESOCO HOLDINGS, INC.

⑈032935⑈ ⑆071923284⑆ 87652⑈02349⑈



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 North Broward, Inc.	
2. Site Name: Wheelabrator North Broward, Inc.	
3. Facility Identification Number: <input checked="" type="checkbox"/> Unknown	
4. Facility Location: Street Address or Other Locator: 2600 NW 48th Street City: Pompano Beach County: Broward Zip Code: 33073	
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. Chuck Faller	
2. Application Contact Mailing Address: Organization/Firm: Wheelabrator North Broward, Inc. Street Address: 2600 NW 48th Street City: Pompano Beach State: FL Zip Code: 33073	
3. Application Contact Telephone Numbers: Telephone: (954) 971 - 8701 ext. 250 Fax: (954) 971 - 8703	

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: AC 06-186997

Reason for revision: Removal of MAC Filter Model 120 LST 100 Baghouse
(see attached Engineer's Certification of 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.

4. Professional Engineer Statement:

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

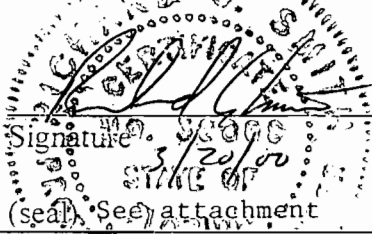
(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions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

A circular professional engineer seal for the State of Florida. The seal contains the text "STATE OF FLORIDA" around the perimeter and "Professional Engineer" in the center. A signature is written across the seal, and the date "3/20/00" is stamped over it. Below the seal, the text "(seal) See attachment" is printed.


March, 2000
Date

* Attach any exception to certification statement.


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

I, the undersigned, hereby certify that:

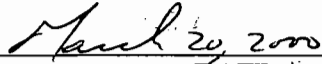
1. An inspection of the Ash Handling System as described in Permit No. AC 06-186997 has been conducted to determine if the process is a particulate matter emission source.
2. The ash handling system combines the ash from several locations including the scrubber, furnace bottom ash (wet), and baghouse 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



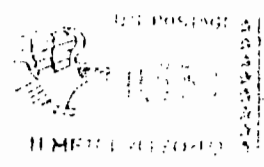
REGISTRATION NO.



DATE

(seal)

WHEELABRATOR NORTH BROWARD INC.
2600 N.W. 48th STREET
POMPANO BEACH, FL 33073



A

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR ROAD
TALLAHASSEE, FL 32399-2400
ATTN: WENDY ALEXANDER

32399-2400



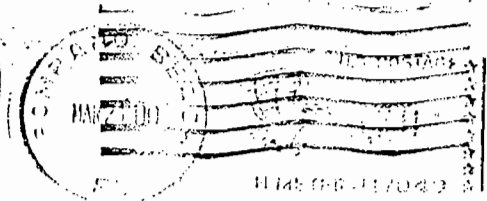
WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY
2600 N.W. 48th Street
Pompano Beach, FL 33073



CERTIFIED

Z 239 398 009

MAIL



A

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

32399-2400





RECEIVED

DEC 20 1999

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

December 15, 1999

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

Certified Mail P 082 970 898
Return Receipt

Re: Draft Title V Permit No. 0112120-001-AV
Wheelabrator North Broward

Dear Mr. Sheplak:

Below are Wheelabrator North Broward's comments to draft Title V permit No. 0112120-001-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-112B). 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.10, A.22 and A.23 - 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.31 - 40 CFR 60.11(d) is a general NSPS requirement which applies only to the Subpart E and Subpart Db particulate limits since these are the only applicable NSPS requirements.

- 5) A.37- A.43; The 40 CFR 60.13 General NSPS monitoring requirements do not apply until the Subpart Cb requirements become effective. There are no NSPS CEM requirements under Subparts E and Db.
- 6) A.44- Footnote 2 should specify also that a 1-hour continuous average constitutes 1 test run. Footnote 3 should apply to Method 7 not 7E and footnote 4 should be added to Methods 6C and 7E to allow the use of CEM relative accuracy results for determining compliance under 40 CFR 60 Appendix B. This footnote is in the South Broward draft permit.
- 7) A.45-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 combusting a heterogeneous fuel. Method 18 is for specific hydrocarbons using GC/FID, requires multiple calibration standards and is not a continuous measurement. Test Method for Arsenic should be Method 29
- 8) A.49-The fugitive ash requirements are for Subpart Cb which do not become effective until after initial Subpart Cb performance tests are completed.
- 9) A.50- A .60: These conditions reference the general NSPS requirements and therefore apply only to the Subpart E and Db particulate limits.
- 10) A. 64 is not applicable. See comment 3 above.
- 11) A.65 is not applicable since there are no limits based at 50 % excess air.
- 12) 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.
- 13) Permitting Notes: 40 CFR 61, Subpart C Beryllium is not applicable. Please see comment 3 above.
- 14) B.1 and B.2- References to 40 CFR 61 NESHAPS should be deleted. See comment 3 above.
- 15) B.12- 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 regulation under Subparts Eb and Cb. Since the North Broward facility is already subject to Subpart Cb, these conditions are not applicable.
- 16) B.21- 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.52 is an error and can be deleted. Reference to specific condition A.49 should be changed to B.69 since B.69 is the correct reference for performance testing.
- 18) B.40-Beryllium lb/mmbtu emission limit was changed to 0.001 mg/dscm @ 7%O2 equivalent limit in latest PSD revision PSD-FL-112 (B).
- 19) B.39 and B.40- NESHAPS Beryllium limit should not be applicable per comment 3 above.
- 20) B.43 and B.44- Fluoride limit should be expressed as 4.454 mg/dscm @7%O2 consistent with other concentration based limits. PA 86-22 VOC and Sulfuric acid mist lb/MMBtu limits should be converted to 22 ppm @ 7% O2 and 13 ppm @ 7% equivalent limits respectively for compliance purposes. Equivalent limits are calculated using the EPA Method 19 F-Factor of 9570.
- 21) B.47- Paragraph (1), first sentence should read: " the standards under 40 CFR 60 Subpart Cb apply at all times except during periods".

22) B.50 - 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, SO₂ and NO_x since excess emissions under Subpart Cb and PSD-FL-112 (B) are defined by averaging times longer than 2 hours. Excess emission averaging times for CO and SO₂ and NO_x are 4 hour block and 24 hour block respectively-any excess emission is already over 2 hours in length.

23) B.66- 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.71-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.73-The appropriate test method for VOC is Method 25A, which provides continuous total hydrocarbon data. See comment 7. The test method for Arsenic should be Method 29. This Condition should not be federally enforceable as with all PA-86-22 based requirements.

23) B.74-This condition should not be federally enforceable as with all other PPSC conditions under PA 86-22.

24) B. 84-This condition can be eliminated since it is no longer required by the recently approved PSD modifications under PSD-FL-112 (B). For the same reason Appendix EFF can also be eliminated.

25) B. 85- Subpart Cb only requires that SO₂ monitors be located upstream of the acid gas control device (inlet to scrubbers) if compliance with the SO₂ limit will be demonstrated using the alternative SO₂ % reduction criterion. If compliance is to be demonstrated on the outlet concentration only, then only SO₂ monitors located downstream of the fabric filter are required. Condition B. 83 should be modified to only require inlet SO₂ monitors if the % reduction option will be used. Last sentence suggested language would be as follows: " SO₂ monitors shall be located downstream of the bag house if compliance will be determined on a concentration basis or upstream of the scrubbers and downstream of the bag house if compliance will be determined using % reduction. "

26) Report and Record Keeping Requirements-There are conflicts in the reporting requirements. Conditions B.98, B.99 and B.13 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.105 and B. 106. 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.113 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.

27) B.114- 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.

28) Subsection C- Emissions Unit 005, the MAC Filter bag house (Model 120 LST100) is no longer in operation and has been dismantled following DEP notification. The bag house 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.39 (40 CFR 60.36b and 40 CFR 60.55b).

29) 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.

30) Conditions C.4, C.5 and C.6- Language relating to the ash handling system can be deleted based on comment 28 above.

31) Table 1-1 Summary of Air Pollutant Standards and Terms- Standards for Be and FI for all units should be expressed in mg/dscm at 7%O2 per PSD-FL-112 (B) and comment 19 above respectively.

32) 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).

33) Appendix H-1 Permit History- PSD-FL-112 (B) should be incorporated in table.

Sincerely,

Paul Guyo for William Roberts

William Roberts
Regional Manager

Cc: Chuck Faller
Tim Porter
Matt Killeen
Jeff Turpin
Scott Shannon
File; 3.7.3
5.1.3.2



WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

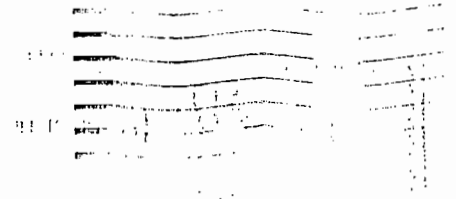
2600 N.W. 48th Street
Pompano Beach, FL 33073



CERTIFIED

P 082 970 898

MAIL



Scott M. Sheplak, P.E.
FL Dept. of Environmental Prot.
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

A

8



RECEIVED

AUG 10 2000

August 8, 2000

BUREAU OF AIR REGULATION

WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

2600 N.W. 48th Street
Pompano Beach, FL 33061
(954) 971-8701
(954) 971-8703 Fax

RECEIVED

AUG 10 2000

BUREAU OF AIR REGULATION

CERTIFIED MAIL # Z 239 397 984

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 North Broward
Comments to Draft Title V Permit

Dear Mr. Sheplak:

Below are Wheelabrator North Broward's comments to Revised Draft Title V permit No. 0112120-001-AV that was published in the Sun Sentinel on July 9, 2000:

- 1) Page 30, B.12 Capacity- Paragraph (b) is not applicable. Municipal waste combustor operating capacity defined under 40 CFR 60.51b specifically excludes MWC's constructed before September 20, 1994.
- 2) Page 38, Emission Limitations and Standards- Permitting Note: Last sentence of permitting note should reference PSD -FL- 112(B).
- 3) Pages 38-40, Condition B.35: This condition should only reference 40 CFR 60.33b as basis for limit consistent with other Cb limits incorporated into PSD FL-112 (B).
- 4) Page 42, Condition B.45: 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.79; Condition 79 should be modified since the requirement to calculate a 12% CO2 F-Factor was deleted in PSD-FL-112 (B) when lb/mmbtu limits were changed to concentration based limits. Compliance with emission limit in lb/mmbtu (see condition B.40) 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-112 (B).
- 6) Page 55, Condition B.80: Condition 1.d.(3) of PSD FL-112(B), the basis for Condition B.80, 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 SO2 monitors upstream of scrubber would not be required if SO2 removal efficiency would not be used for determining compliance with the alternative removal limit. Furthermore, SO2 monitors



WHELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

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

Page Two

are not required under Specific Condition 9 of PSD FL-112 (B), which specifies the 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-112 (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 a F-Factor of 14,389 dscf/mmbtu at 7% O₂ and not 16,673 dscf/mmbtu at 7%O₂. The 14.439 dscf/mmbtu F-Factor is based on EPA Method 19 F-Factor of 950 dscf/mmbtu converted to 7%O₂.

8) Page 59, Condition B.93, paragraph (6): The SO₂ limit under Condition B.32 specifies a concentration limit or % removal and there is no maximum ppm limit for SO₂. Paragraph (6) of Condition 93 implies a ppm limit only for SO₂ and this should be clarified.

Sincerely,

A handwritten signature in black ink that reads "Paul Guy for". The signature is written in a cursive, flowing style.

William Roberts
Regional Manager

Enclosures

Cc: Chuck Faller
Timothy Porter
Matt Killeen
Scott Shannon
File: 3.7.3
File: 5.1.3.2

INTEROFFICE MEMORANDUM

-file-
e-mail receipt
of comments.

Date: 08-Aug-2000 09:28am
From: cfaller
cfaller@wm.com
Dept:
Tel No:

To: scott.sheplak (scott.sheplak@dep.state.fl.us)

Subject: North Broward Draft Title V Comments

Please find attached Wheelabrator North Broward's comments to the Draft Title V permit, which was published in the local newspaper on July 9, 2000. A signed, hard-copy of this letter will be sent to your attention by certified mail today. (See attached file: Draft Title V Comments (2nd Draft) - NB.doc)



RECEIVED

JUL 17 2000

WHEELABRATOR NORTH BROWARD, INC.
WASTE MANAGEMENT COMPANY

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

BUREAU OF AIR REGULATION

July 13, 2000

CERTIFIED MAIL # Z 239 397 969

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

Re: Wheelabrator North Broward

Draft Title V Permit
Proof of Publication

Dear Mr. Sheplak:

Please find enclosed Wheelabrator North Broward's proof of publication of the "Public Notice of Intent to Issue a Combined Air Construction Permit/Title V Operation Permit".

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

Sincerely,

William Roberts
Regional Manager

Enclosures

cc: Chuck Faller (with)
Matt Killeen (without)
Tim Porter (without)
File 3.7.3
File 5.1.3.2.

6/20/00 cc: Wendy Alexander

s:071300

S U N - S E N T I N E L
PUBLISHED DAILY
FORT LAUDERDALE, BROWARD COUNTY, FLORIDA
BOCA RATON, PALM BEACH COUNTY, FLORIDA
MIAMI, DADE COUNTY, FLORIDA

STATE OF FLORIDA
COUNTY OF BROWARD/PALM BEACH/DADE
BEFORE THE UNDERSIGNED AUTHORITY PERSONALLY APPEARED

.....*CHRIS BULL*..... WHO ON OATH SAYS THAT
HE/SHE IS A DULY AUTHORIZED REPRESENTATIVE OF THE
CLASSIFIED DEPARTMENT OF THE SUN-SENTINEL, DAILY
NEWSPAPER PUBLISHED IN BROWARD/PALM BEACH/DADE COUNTY,
FLORIDA THAT THE ATTACHED COPY OF ADVERTISEMENT, BEING A

NOTICE

IN THE MATTER OF

NORTH

IN THE CIRCUIT COURT, WAS PUBLISHED IN SAID NEWSPAPER IN
THE ISSUES OF

C , 07/09, 1 X

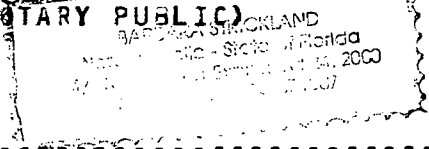
76790100

AFFIANT FURTHER SAYS THAT THE SAID SUN-SENTINEL IS A
NEWSPAPER PUBLISHED IN SAID BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA, AND THAT THE SAID NEWSPAPER HAS HERETOFORE
BEEN CONTINUOUSLY PUBLISHED IN SAID BROWARD/PALM BEACH/DADE
COUNTY, FLORIDA, EACH DAY, AND HAS BEEN ENTERED AS SECOND
CLASS MATTER AT THE POST OFFICE IN FORT LAUDERDALE, IN SAID
BROWARD COUNTY, FLORIDA, FOR A PERIOD OF ONE YEAR NEXT
PRECEDING THE FIRST PUBLICATION OF THE ATTACHED COPY OF
ADVERTISEMENT; AND AFFIANT FURTHER SAYS THAT HE/SHE HAS
NEITHER PAID NOR PROMISED ANY PERSON, FIRM OR CORPORATION
ANY DISCOUNT, REBATE, COMMISSION OR REFUND FOR THE PURPOSE
OF SECURING THIS ADVERTISEMENT FOR PUBLICATION IN SAID
NEWSPAPER.

.....*Chris Bull*.....
(SIGNATURE OF AFFIANT)

SWORN TO AND SUBSCRIBED BEFORE ME
THIS 09 DAY OF JULY
A.D. 2000

.....*Barbara Stickland*.....
(SIGNATURE OF NOTARY PUBLIC)



.....
(NAME OF NOTARY TYPED, PRINTED OR STAMPED)

PERSONALLY KNOWN OR

PRODUCED IDENTIFICATION

**PUBLIC NOTICE OF INTENT TO ISSUE
A COMBINED AIR CONSTRUCTION PERMIT/TITLE V OPER-
ATION PERMIT
STATE OF FLORIDA DEPARTMENT OF ENVIRONMEN-
TAL PROTECTION**

Air Construction Permit No.: 0112120-002-AC
Revised DRAFT Title V Operation Permit No.: 0112120-
001-AV
North Broward Waste-to-Energy Facility Broward
County

The Department of Environmental Protection (permitting
authority) gives notice of its intent to issue a combined Air
Construction Permit/Title V Operation Permit to Wheel-
abrator North Broward, Inc. for the North Broward Waste-
to-Energy Facility located at 2600 N.W. 48th Street, Pom-
pano Beach, Broward County. The applicant's name and
address are: Wheelabrator North Broward, Inc., 2600 N.W.
48th Street, Pompano Beach, Florida, 33073.

The permitting authority will issue the combined Draft
Air Construction Permit/Title V PROPOSED Operation
Permit, and subsequent combined Final Air Construction
Permit/Title V FINAL Operation Permit, in accordance with
the conditions of the combined Draft Air Construction Per-
mit/Title V Operation Permit unless a response received in
accordance with the following procedures results in a dif-
ferent decision or significant change of terms or condi-
tions. The permitting authority has determined that a com-
bined Air Construction Permit/Revised DRAFT Title V
Operation Permit are required in order to: 1) remove a bag
house filter system from an emissions unit/activity, the Unit
005 Ash Handling System (including conveyors, metal re-
covery area, ash conditioning building, and ash loadout)
and 2) remove air construction permit conditions associat-
ed with the bag house filter system.

The permitting authority will accept written comments
concerning the proposed combined Draft Air Construction
Permit/Revised DRAFT Title V Operation Permit issuance
action for a period of 30 (thirty) days from the date of
publication of this Notice. Written comments should be
provided to the Department's Bureau of Air Regulation,
2600 Blair Stone Road, Mail Station #5505, Tallahassee,
Florida 32399-2400. Any written comments filed shall be
made available for public inspection. If written comments
received result in a significant change in this combined
Draft Air Construction Permit/Revised DRAFT Title V Oper-
ation Permit, the permitting authority shall issue a com-
bined Revised Draft Air Construction Permit/Revised
DRAFT Title V Operation Permit and require, if applicable,
another Public Notice.

A person whose substantial interests are affected by the
proposed permitting decision may petition for an adminis-
trative hearing in accordance with Sections 120.569 and
120.57 of the Florida Statutes (F.S.). The petition must
contain the information set forth below and must be filed
(received) in Office of General Counsel of the Department
of Environmental Protection, 3900 Commonwealth Boule-
vard, Mail Station #35, Tallahassee, Florida 32399-3000
(Telephone: 850/488-9730; Fax: 850/487-4938). Petitions
filed by any persons other than those entitled to written
notice under Section 120.60(3), F.S., must be filed within
fourteen days of publication of the public notice or within
fourteen days of receipt of the notice of intent, whichever
occurs first. Under Section 120.60(3), F.S., however, any
person who asked the permitting authority for notice of
agency action may file a petition within fourteen days of
receipt of that notice, regardless of the date of publication.
A petitioner shall mail a copy of the petition to the ap-
plicant at the address indicated above, at the time of filing.
The failure of any person to file a petition within the ap-
plicable time period shall constitute a waiver of that person's
right to request an administrative determination (hearing)
under Sections 120.569 and 120.57, F.S., or to intervene in
this proceeding and participate as a party to it. Any subse-
quent intervention will be only at the approval of the pre-
siding officer upon the filing of a motion. In compliance
with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the
permitting authority's action is based must contain the
following information:

- (a) The name and address of each agency affected and
each agency's file(s) or identification number(s), if known;
- (b) The name, address and telephone number of the
petitioner; name address and telephone number of the
petitioner's representative, if any, which shall be the ad-
dress for service purposes during the course of the pro-
ceeding; and an explanation of how petitioner's substantial
rights will be affected by the agency determination;
- (c) A statement of how and when the petitioner received
notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If
there are none, the petition must so state;
- (e) A concise statement of the ultimate facts alleged, as
well as the rules and statutes which entitle petitioner to
relief;
- (f) A statement of the specific rules or statutes the peti-
tioner contends require reversal or modification of the
agency's proposed action; and,
- (g) A statement of the relief sought by the petitioner,
stating precisely the action petitioner wishes the agency to
take with respect to the agency's proposed action.

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

Because the administrative hearing process is designed
to formulate final agency action, the filing of a petition
means that the permitting authority's final action may be
different from the position taken by it in this notice of
intent. Persons whose substantial interests will be affected
by any such final decision of the permitting authority on the
application have the right to petition to become a party to
the proceeding, in accordance with the requirements set
forth above.

Mediation is not available for this proceeding.

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

A complete project file is available for public inspection
during normal business hours, 8:00 a.m. to 5:00 p.m.,
Monday through Friday, except legal holidays, at:

Permitting Authority:
Department of Environmental Protection
Bureau of Air Regulation

111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32301
Telephone: 850/488-0114
Fax: 850/922-6979
Affected District/Local Programs:
Department of Environmental Protection
Southeast District Office
400 North Congress Avenue
West Palm Beach, Florida 33416-5425
Telephone: 561/681-6600
Fax: 561/681-6755
Broward County Department of Natural Resource Pro-
tection Air Quality Division
218 Southeast First Avenue
Ft. Lauderdale, Florida 33301
Telephone: 954/519-1220
Fax: 954/519-1495

The complete project file includes the Technical Evalua-
tion and Preliminary Determination, combined Draft Air
Construction Permit/ Revised DRAFT Title V Operation
Permit, the application, and the information submitted by
the responsible official, exclusive of confidential records,
under Section 403.111, F.S. Interested persons may con-
tact Scott M. Sheplak, PE at the above address or call
850/921-9532, for additional information.
July 9, 2000



WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY
2600 N.W. 48th Street
Pompano Beach, FL 33073



CERTIFIED

Z 239 397 969

MAIL



Scott M. Sheplak, P.E.
FL Dept. of Environmental Prot.
Twinn Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

32399-6342 01





WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

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

08 June, 2000

CERTIFIED MAIL # Z 239 398 029

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

RECEIVED

JUN 23 2000

BUREAU OF AIR REGULATION

RECEIVED
JUN 22 2000
Bureau of Air Monitoring
& Mobile Sources

Re: Wheelabrator North Broward
Draft Title V permit

Dear Mr. Sheplak:

Wheelabrator North 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 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 86-22) 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:

"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) 971-8701.

Sincerely,

William Roberts
William Roberts
Regional Manager

cc: Chuck Faller
Tim Porter
Matt Killeen
File: 3.7.3
5.1.3.2

s: 060800

6/23/00 cc: *Scott Sheplak*
Wendy Alexander



WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

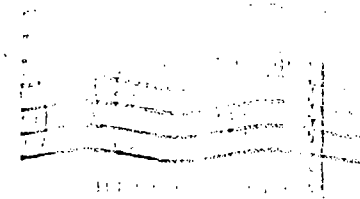
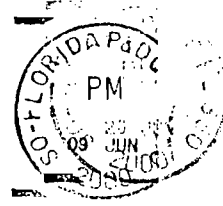
2600 N.W. 48th Street
Pompano Beach, FL 33073



CERTIFIED

Z 239 398 029

MAIL



Deputy Chief Compliance
Ambient Monitoring Bureau of Air
Quality Management
2600 Blair Stone Road
Tallahassee, FL. 32399-2400

A

32399-2400





WHEELABRATOR NORTH BROWARD, IN
A WASTE MANAGEMENT COMPANY

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

COVER SHEET

TO: Wendy Alexander DATE: 6/21/00

FAX NUMBER OF RECEIVER: 850-922-6979 PAGES: 2 (including cover)

FROM

- William Roberts*
Plant Manager
- Paul Grego*
Operations Mngr
- Michael Irwin*
Controller
- Chuck Faller*
E.H & S Director
- Kelby Bello*
Accountant
- Olivia Smith*
Accounts Payable
- Chris Leyen*
Maint. Supervisor
- Sally Alvarez*
Human Resources
- Dean Satterly*
E & I
- Ruth Rivera*
Accounts Receivable
- _____
Other

SHOULD YOU HAVE ANY PROBLEMS, CALL SENDER AT (954) 971-8701 EXT. 0

CONTENTS OF TRANSMITTAL: _____



WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

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

08 June, 2000

CERTIFIED MAIL # Z 239 398 029

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

Re: Wheelabrator North Broward
Draft Title V permit

Dear Mr. Sheplak:

Wheelabrator North 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 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 86-22) 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:

"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) 971-8701.

Sincerely,

William Roberts
Regional Manager

cc: Chuck Faller
Tim Porter
Matt Killeen

File: 3.7.3
5.1.3.2

s: 060800

Barbara / File

-File-



RECEIVED

SEP 26 2000

**DIVISION OF AIR
RESOURCES MANAGEMENT**

WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

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

CERTIFIED MAIL #239 397 939

October 14, 2000

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

Re: Wheelabrator North Broward
Compliance with required Construction Completion Date of September 13, 2000 for
Selective Non-Catalytic Reduction (SNCR) System for NOx

Dear Mr. Hewett:

As required by 40 CFR Subpart Cb, construction of the facility SNCR system for NOx was completed on
September 13, 2000.

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

Sincerely,

William Roberts

William Roberts
General Manager

cc: Chuck Faller
Scott Shannon - MPI
Terri Long - FDEP - West Palm Beach
Matt Killeen
Tim Porter
Jeff Turpin - BCOIWM
File: 3.7.3
File: 5.1.3.2

xc: *Isidore Goldman, SED*
Jarret Mack, Broward County

Al Livero, DEP

s:091400

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. William Roberts
Regional Manager
Wheelabrator North Broward, Inc.
2600 N.W. 48th Street
Pompano Beach, FL 33073

Re: DEP File No. 0112120-003-AC, PSD-FL-122C
Modification to Permit No. PSD-FL-122B
Wheelabrator North Broward

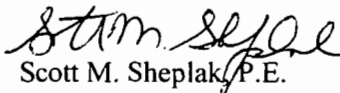
Dear Mr. Roberts:

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 your 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.
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.

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- 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:

Mr. William Roberts
Wheelabrator North Broward, Inc.
2600 NW 48 St.
Pompano Beach, FL 33073

4a. Article Number

P 265 657 774

4b. Service Type

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

7. Date of Delivery

8/25/00

5. Received By: (Print Name)

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

6. Signature: (Addressee or Agent)

X *W. Roberts*

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

P 265 657 774

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Mr. William Roberts
Wheelabrator North Broward, Inc.
2600 NW 48 St.
Pompano Beach, FL 33073

PS Form 3800, April 1995

Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	08-23-00 584



RECEIVED

APR 17 2008

BUREAU OF AIR REGULATION

WHEELABRATOR NORTH BROWARD
A WASTE MANAGEMENT COMPANY

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

April 14, 2008

CERTIFIED MAIL #7006 0810 0002 6561 3146

Mr. Lee Hoefert
Air Program Administrator
Florida Department of Environmental Protection
Southeast District
400 North Congress Ave., Suite 200
West Palm Beach, FL 33401

Re: Wheelabrator North Broward
F.A.C. 62-296.416 Quarterly Mercury Stack Testing
Second Quarter of 2008, Notification

Dear Mr. Hoefert:

As required by F.A.C. 62-296.416, Wheelabrator North Broward will be conducting quarterly mercury stack testing on June 26 and 27, 2008. Tentatively, testing will be conducted on Unit #1.

If there are any questions, please contact this office at (954) 971-8701.

Sincerely,

Scott McIlvaine
Plant Manager

cc: USEPA, Region IV, Pesticides and Toxics Management Division, Air & EPCRA Enforcement
Branch, Air Enforcement Section CERTIFIED MAIL #7006 0810 0002 6561 3153
FDEP, Tallahassee, Bureau of Air Regulation, New Source Review Section,
CERTIFIED MAIL #7006 0810 0002 6561 3160
Broward County Department of Planning and Environmental Protection, Air Quality Division
CERTIFIED MAIL #7006 0810 0002 6561 3177

Chuck Faller
Scott McIlvaine
Tim Porter
Sandy Gutner - MPI
Ram Tewari -BCWRS
File: 3.7.2
5.1.3.2

INTEROFFICE MEMORANDUM

Date: 15-May-2000 03:42pm
From: Wendy Alexander TAL
ALEXANDER_W
Dept: Air Resources Management
Tel No: 850/921-9527

To: Hamilton Oven TAL (OVEN_H)
CC: Scott Sheplak TAL (SHEPLAK_S)

Subject: North & South Broward RRFs

Buck,

Scott Sheplak forwarded this message to me because I am writing the Title V Air Operation Permits for the North & South Broward RRFs. The 1996 Title V permit applications list 68.5 MW for the generator nameplate rating for each facility. I reviewed the PSD files for these facilities and discovered a Final Order of Certification for South Broward dated 06/09/86 that described a facility consisting of three 750 TPD incinerators capable of disposing of 2,250 TPD waste and generating 68.5 MW of electrical power. I also found a Public Notice of a certification hearing for South Broward dated 09/30/85 that described a 68.5 MW facility. I am unable to locate a modification or other document requiring 55.5 MW for this facility.

Wendy Alexander

Teresa

We have a problem with Wheelabrator's numbers for that part of the Order. The Siting Board certified the facility as 55.5 MW and 2200 TPD. They built a facility with a 68.5 MW generator capable of burning 2240 TPD. They may be in violation of the certification.



WHEELABRATOR NORTH BROWARD, INC.
A WASTE MANAGEMENT COMPANY

2600 N.W. 48th Street
Pompano Beach, FL 33073

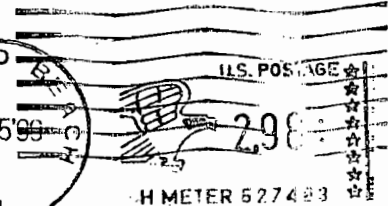
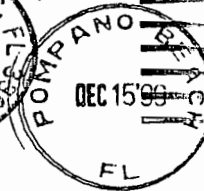


CERTIFIED

P 082 970 898

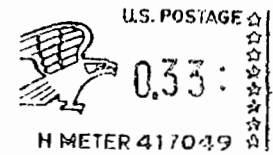
MAIL

Scott M. Sheplak, P.E.
FL Dept. of Environmental Prot.
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400



A

WHEELABRATOR NORTH BROWARD INC.
2600 N.W. 48th STREET
POMPANO BEACH, FL 33073



A

**FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR ROAD
TALLAHASSEE, FL 32399-2400
ATTN: WENDY ALEXANDER**

32399-2400

