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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

DEC - 3 1987

4APT/APB-aes

Mr. Steve Smallwood, P.E, Chief  
Bureau of Air Quality Management  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Lake County Waste to Energy Facility, PSD-FL-113

Dear Mr. Smallwood:

This is to acknowledge receipt of your November 2, 1987, transmittal of the above referenced company's request for a PSD permit revision. This request is the result of negotiations between LGM Engineers Constructors and EPA Region IV and has our full concurrence. We hope that this resolves any concern you may have as expressed in your August 14, 1987, letter regarding this facility.

Please submit copies of the revised PSD permits for this source when they are issued.

Sincerely,

*Bruce P. Miller*

Bruce P. Miller, Chief  
Air Programs Branch  
Air, Pesticides, and Toxics  
Management Division

DER

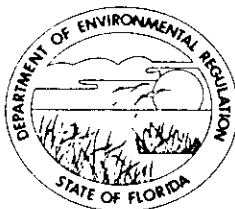
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BAQM

Copied: CHF/BT  
Pradep Rana  
Barry Andrews  
Jon Rogus } 12/9/87 *mr*

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

November 2, 1987

Mr. Wayne Aronson  
Chief  
Program Support Section  
U.S. EPA, Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Lake County Waste to Energy Facility  
State Construction Permit Numbers: AC 35-115379  
Federal PSD Number: PSD-FL-113

Please review and comment on the revised Lake County Waste to Energy Facility application due to additional EPA requirements for acid gas control and a request to increase the NOx BACT standards. If you have any comments or questions, please contact Pradeep Raval or Tom Rogers by November 25, 1987, at the above address or at (904)488-1344.

Sincerely,

Margaret V. Janes  
Planner  
Bureau of Air Quality  
Management

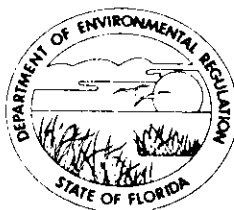
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cc: Pradeep Raval  
Tom Rogers  
Miguel Flores, NPS  
Tom Sawicki, CF Dist.

Enclosures

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

November 2, 1987

Mr. Miguel Flores, Chief  
Permit Review and Technical  
Support Branch  
National Park Service-Air  
Post Office Box 25287  
Denver, Colorado 80225

Dear Mr. Flores:

RE: Lake County Waste to Energy Facility  
State Construction Permit Number: AC 35-115379  
Federal PSD Permit: PSD-FL-113

Please review and comment on the revised Lake County Waste to Energy Facility application due to additional EPA requirements for acid gas control and a request to increase the NOx BACT standards. This facility is within 100 kilometers of the Chassahowitzka Class I area. If you have any comments or questions, please contact Pradeep Raval or Tom Rogers at the above address or at (904)488-1344.

Sincerely,

Margaret V. Janes  
Planner  
Bureau of Air Quality  
Management

/mj

enclosure

cc: Pradeep Raval  
Tom Rogers  
Wayne Aronson, EPA  
Tom Sawicki, CF Dist.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV  
345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

OCT 28 1987

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Walt Walters  
NRG/Recovery Group, Inc.  
1616 Athens Street  
Lakeland, Florida 33802

DER  
NOV 2 1987  
BAQM

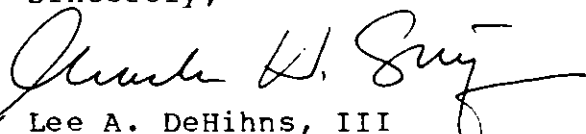
RE: Lake County Waste to Energy Facility

Dear Mr. Walters:

In accordance with the agreement reached between representatives of NRG and Region IV, I have issued the enclosed Administrative Order pursuant to Section 167 of the Clean Air Act. This Order supersedes the prior Order in this matter issued on June 3, 1987, by the Regional Administrator. It defines what the parties have agreed represents Best Available Control Technology (BACT) for the proposed Lake County facility. I understand you have already begun preparation of an application to the Florida Department of Environmental Regulation to amend the Prevention of Significant Deterioration permit to reflect this agreement on BACT, as required by this Order.

I appreciate the cooperation of NRG and its representatives in the amicable resolution of this matter.

Sincerely,

  
for Lee A. DeHihns, III  
Acting Regional Administrator

Enclosure

cc: Les Oakes, Esq.  
Dale Twachtmann  
Steve Smallwood, P.E.

BEFORE THE  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

In the matter of: )  
)  
LAKE COUNTY WASTE TO ENERGY FACILITY )  
) Order  
OKAHUMPKA, FLORIDA )  
PROCEEDINGS UNDER )  
SECTION 167 OF THE CLEAN )  
AIR ACT, AS AMENDED, 42 U.S.C. §7477 )

ADMINISTRATIVE ORDER

This Administrative Order is issued this date by the Acting Regional Administrator, Region IV, United States Environmental Protection Agency (EPA), pursuant to Section 167 of the Clean Air Act (the Act), 42 U.S.C. §7477.

FINDINGS OF FACT

1. The NRG/Recovery Group, Inc., (NRG), proposes to construct and operate a Lake County Waste to Energy Facility (Lake County) in Okahumpka, Lake County, Florida. The Lake County facility will consist of two mass burn incinerators which will each incinerate approximately 250 tons per day of municipal solid waste. These incinerators will be fueled with a combination of municipal solid waste and wood chips. These incinerators will emit particulate matter, sulfur dioxide (SO<sub>2</sub>), nitrogen oxides, carbon monoxide, volatile organic compounds, lead, beryllium, fluoride, sulfuric acid mist, mercury, dioxins, dibenzofurans, and hydrogen chloride. All of the aforementioned

pollutants are regulated by the Act except dioxins, dibenzofurans, and hydrogen chloride.

2. The area of construction of the Lake County Waste to Energy Facility is located in an attainment area for all pollutants regulated by the Act. [40 Code of Federal Regulations (C.F.R.) §81.310] The facility is considered a major stationary source because its potential emissions (which are subject to regulations under the Act) are above the Prevention of Significant Deterioration (PSD) of Air Quality threshold level. Consequently, this facility is regulated under the PSD rules and regulations.

3. On March 11, 1986, NRG applied to the Florida Department of Environmental Regulation (DER) for a PSD permit to construct and operate two 250 tons per day municipal solid waste energy recovery units at its Lake County facility located on Jim Rogers Road in Okahumpka, Florida, pursuant to the Florida State Implementation Plan (SIP) [Florida Administrative Code (F.A.C.) Rule 17-2.500 et seq.].

4. On May 20, 1986, in response to said PSD application, the Florida DER issued a Preliminary Determination which contained, in the State's judgment, the Best Available Control Technology (BACT) for the proposed incinerators. The BACT Determination contained emission limits for all applicable pollutants regulated by the Act and contemplated that a baghouse

(to control particulates) in combination with a scrubber (to control acid gases) constituted BACT.

5. On July 2, 1986, EPA notified the Florida DER that the SO<sub>2</sub> emission limit contained in the Florida DER BACT Determination may not adequately reflect BACT (i.e., proposed SO<sub>2</sub> emission limit not sufficiently stringent) and that the BACT Determination should also consider the effect of controlling SO<sub>2</sub> on unregulated pollutants such as hydrogen chloride and dioxin. Furthermore, EPA informed DER that it was EPA policy that the control of nonregulated air pollutants may be considered in imposing a more stringent BACT limit on regulated pollutants, if there is a reduction in the unregulated air pollutants which can be directly attributed to the control device selected for the abatement of the regulated pollutants.

6. On August 15, 1986, DER issued a second PSD Preliminary Determination with a modified BACT Determination. The modified BACT Determination no longer contained the requirement for acid gas controls, but only required that the applicant leave space for the acid gas control equipment in the event there would be a future state rule change for resource recovery facilities. Removal of the requirement to employ acid gas control meant the modified BACT Determination could not adequately address EPA's concern about a more stringent SO<sub>2</sub> emission limit.

7. On September 19, 1986, EPA notified DER that EPA was not persuaded by Lake County's contention that municipal solid waste incineration with acid gas control is not economically feasible.

8. On September 24, 1986, the Florida DER issued its Final Determination and PSD permit to the NRG for the proposed Lake County facility. The Final Determination and State PSD permit did not require the installation of acid gas control.

9. On October 23, 1986, EPA notified the Florida DER that EPA did not concur with DER's Final Determination of BACT.

10. On February 11, 1987, EPA notified Florida DER that the DER PSD permit issued to the NRG for the Lake County facility on September 24, 1986, was deficient and that EPA may initiate appropriate enforcement action against the Lake County facility to prevent or delay the construction of the facility.

11. On February 11, 1987, EPA notified the NRG that the Florida DER PSD permit was deficient and that unless the DER PSD permit was modified to reflect what EPA concluded represents BACT, EPA may initiate appropriate enforcement action to prevent or delay the construction of the facility.

12. On June 3, 1987, the Regional Administrator, Region IV, issued an order pursuant to Section 167 of the Act. That order prohibited the commencement of any construction of a



permanent nature on the Lake County facility until a PSD permit was issued incorporating all of the requirements for PSD under Part C of the Act, the Florida SIP, and Region IV's BACT determination. The Order also required that a certification be submitted to EPA that construction of the Lake County facility would not commence until such a PSD permit was issued.

13. On June 12, 1987, NRG submitted the required certification to Region IV.

14. On July 1, 1987, Region IV and NRG began meeting to identify emission limitations that would, in Region IV's judgment, represent BACT for the Lake County facility. On October 8, 1987, Region IV and NRG agreed that the emission limitations and conditions contained in Appendix A to this order represent BACT for the Lake County facility.

15. NRG has agreed to apply to the Florida DER to amend the PSD permit issued on September 24, 1986. The application will request that the PSD permit be amended to incorporate the emission limitations and conditions contained in Appendix A.

16. Region IV and NRG have agreed that construction of the Lake County facility in accordance with the requirements of Appendix A would constitute construction in conformance with Part C of the Act and the Florida SIP.

CONCLUSIONS OF LAW

1. The Administrator of the EPA pursuant to his authority under Section 109 of the Act, 42 U.S.C. §7409, promulgated National Primary and Secondary Ambient Air Quality Standards (NAAQS) for certain criteria pollutants, including total suspended particulate matter, sulfur oxides (SO<sub>2</sub>), nitrogen oxides, carbon monoxide, ozone, and lead. (40 C.F.R. §§50.4 - 50.12)

2. Pursuant to Section 110 of the Act, 42 U.S.C. §7410, the Administrator of EPA, in 45 Federal Register 52676 (August 7, 1980), promulgated amended regulations for PSD in areas where the existing air quality is better than said ambient standards and incorporated said regulations into the various implementation plans of each state. The relevant regulations are codified at 40 C.F.R. §51.24.

3. The Florida SIP contains federally approved PSD regulations, based on the above-referenced PSD regulations, for such attainment or "clean air" areas. (F.A.C. Rule 172.500)

4. The area of construction for the Lake County Waste to Energy facility is an attainment area for NAAQS for all pollutants. (40 C.F.R. §81.310)

5. NRG is the owner and operator of the major emitting

resource recovery facility in Lake County, Florida, and proposes to construct said facility site.

6. Region IV finds the Florida DER PSD permit issued September 24, 1986, for the Lake County facility does not require that the facility be constructed in conformance with the requirements of Part C of the Act. Specifically, the permit does not require the installation of acid gas control equipment or adequately explain its failure to do so, and does not require sufficiently stringent emission limitations for particulate matter and SO<sub>2</sub>. Accordingly, the permit does not reflect BACT as required by the Act.

7. The construction of the Lake County facility in accordance with the Florida DER PSD permit issued September 24, 1986, would violate Section 165(a) of the Act. Consequently, the issuance of this order, pursuant to Section 167 of the Act, 42 U.S.C. §7477, is required to prevent such construction.

8. The construction of the Lake County facility in accordance with the emission limitations and conditions of Appendix A would constitute construction in conformance with Part C of the Act and the Florida SIP.

9. The authority of the Administrator of EPA pursuant to §113(a) of the Act, 42 U.S.C. §7413(a), to make findings of violation of the Florida SIP, to issue notices of violation and to confer with the alleged violator has been delegated, first,

to the Regional Administrator [earlier delegation consolidated to Delegations Manual, No. 7-6 (July 25, 1984)] and second, to the Director, Air, Pesticides, and Toxics Management Division, Region IV [earlier delegation consolidated in Region IV Delegation Manual, No. 4-2 (March 15, 1985)].

10. The authority of the Administrator of EPA to issue orders pursuant to Section 167 of the Act, 42 U.S.C. §7477, was delegated to the Regional Administrator [earlier delegation consolidated to Delegations Manual, No. 7-38 (July 25, 1984)]. The Regional Administrator, Region IV, has also consulted with the Associate Enforcement Counsel for Air and the Director of the Stationary Source Compliance Division pursuant to delegation requirement.

ORDER

Consequently, based upon investigation and analysis of all relevant facts, including any good faith efforts to comply, and pursuant to Section 167 of the Clean Air Act, 42 U.S.C. §7477, it is hereby ORDERED:

1. The order issued by the Regional Administrator on June 3, 1987 in this matter is, as of the date of this order, superseded by this order.

2. NRG shall not commence construction of a permanent nature of the Lake County facility unless the construction is designed and intended to conform to the emission limitations

and conditions in Appendix A. Construction of a permanent nature includes, but is not limited to, installation of building supports and foundations, paving, laying of underground pipe, construction of permanent storage and activities of a similar nature.

3. If NRG elects to commence construction of a permanent nature as allowed by Paragraph 2 above, it shall, at least ten days prior to commencement of construction, certify that the construction is designed and intended to conform to the emission limitations and conditions in Appendix A. This certification must be submitted to:

Winston A. Smith, Director  
Air, Pesticides and Toxics Management  
Division  
U.S.E.P.A.  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

4. If NRG elects to commence construction of a permanent nature as allowed by Paragraph 2 above, it shall, within twenty days of receipt of this order, apply to the Florida DER to have the PSD permit issued September 24, 1986, to NRG amended to incorporate the emission limitations and conditions contained in Appendix A.

5. NRG shall not operate the Lake County facility unless and until it receives a valid PSD permit from Florida DER which requires the Lake County facility to meet the emission limitations and conditions contained in Appendix A.



## A P P E N D I X A

### Specific Conditions

#### 1. Municipal Waste Combustor Design

- a. Each of the two municipal waste combustors (MWC) shall have a design rated capacity of 250 tons Municipal Solid Waste (MSW) per day, 104 million BTU input per hour and 60,200 pounds steam output per hour with MSW having a heating value of 5,000 BTU per pound.
- b. The maximum individual MWC throughput shall not exceed 288 tons per day, 120 million BTU per hour and 69,000 pounds steam per hour, (3-hour average).
- c. The design furnace mean temperature at the fully mixed zone of the incinerator shall be not less than 1,800°F.
- d. The normal operating range shall be 80% to 115% of design rated capacity.
- e. The MWC shall be fueled with municipal solid waste or wood chips. Other wastes shall not be burned without specific prior written approval of Florida DER.
- f. Auxiliary fuel burners shall be fueled only with distillate fuel oil or gas (e.g., natural or propane). The annual capacity factor for fuel oil or gas shall be less than 10%, as determined by 40 C.F.R. §60.43b(d). If the annual capacity factor for fuel oil or gas is greater than 10%, the facility shall be subject to 40 C.F.R. §60.44b standards for nitrogen oxides.
- g. Auxillary fuel burner(s) shall be used at start up during the introduction of MSW fuel until design furnace gas temperature is achieved.

#### 2. Air Pollution Control Equipment Design

- a. Each MWC shall be equipped with a particulate emission control device.
- b. Each MWC shall be equipped with an acid gas control device designed to remove at least 90% of acid gases and 70% sulfur dioxide emissions.
- c. The acid gas emission control system shall be designed to be capable of cooling flue gases to an average temperature not exceeding 300°F (3-hour rolling average).

3. Flue gas emissions from each unit shall not exceed the following:

- a. Particulate: 0.0150 grains/dscf corrected to 12% CO<sub>2</sub>.
- b. Sulfur Dioxide: 60 ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>, 6-hour rolling average;  
or  
70% reduction of uncontrolled SO<sub>2</sub> emissions, 6-hour rolling average. Not to exceed 120 ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>, 6-hour rolling average.
- c. Nitrogen Oxides: 385 ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>.
- d. Carbon Monoxide: 200 ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>, 4-hour rolling average.
- e. Volatile Organic Compounds: 70 ppm<sub>dv</sub> as carbon corrected to 12% CO<sub>2</sub>.
- f. Lead:  $3.1 \times 10^{-4}$  gr/dscf corrected to 12% CO<sub>2</sub>.
- g. Fluoride:  $1.5 \times 10^{-3}$  gr/dscf corrected to 12% CO<sub>2</sub>.
- h. Beryllium:  $2.0 \times 10^{-7}$  gr/dscf corrected to 12% CO<sub>2</sub>.
- i. Mercury:  $3.4 \times 10^{-4}$  gr/dscf corrected to 12% CO<sub>2</sub>.
- j. Visible Emissions: Opacity of MWC emissions shall not exceed 15% opacity (6-minute average), except for one 6-minute period per hour of not more than 20% opacity. Excess emissions resulting from startup or shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to, and the duration of excess emissions are minimized.



For each pollutant for which a continuous emission monitoring system is required in Condition 5., the emission averaging time specified above shall be used to establish operating limits and reportable excess emissions.

Compliance with the permit emission limits shall be determined by EPA reference method tests included in 40 C.F.R. Parts 60 and 61 and listed in Condition 4. of this permit or by equivalent methods approved by Florida DER.

For the purpose of establishing specific increment consumption for TSP and SO<sub>2</sub> at the facility, an hourly emission rate shall be established for each pollutant at the time of performance testing using flue gas flow rates (corrected to 12% CO<sub>2</sub> and prorated to 115% rated furnace capacities) and the applicable concentration limits established above for TSP and SO<sub>2</sub>.

The units are subject to 40 C.F.R. Part 60, Subpart E and Subpart Db, New Source Performance Standards (NSPS), except that where requirements within the permit are more restrictive, the requirements of the permit shall apply.

#### 4. Compliance Tests

- a. Initial compliance tests for particulate matter, SO<sub>2</sub>, nitrogen oxides, CO, VOC, lead, fluorides, mercury and beryllium shall be conducted in accordance with 40 C.F.R. §60.8 (a), (b), (d), (e) and (f).
- b. Annual compliance test(s) for particulate matter and nitrogen oxides shall be performed. Test(s) may be performed in the common stack.
- c. Compliance with the opacity standard shall be determined in accordance with 40 C.F.R. §60.11(b) and (e).
- d. Compliance with the requirement for 70% control of sulfur dioxide emissions will be determined by using the test methods in Condition 4.e. below or a continuous emission monitoring system for SO<sub>2</sub> emissions before and after the air pollution control equipment which meets the requirements of Performance Specification 2 of 40 C.F.R. 60, Appendix B.
- e. The following test methods and procedures of 40 C.F.R. Parts 60 and 61 or equivalent methods having prior approval of Florida DER shall be used for compliance testing:
  - (1) Method 1 for selection of sample site and sample traverses.

- (2) Method 2 for determining stack gas flow rate.
- (3) Method 3 or 3A for gas analysis for calculation of percent O<sub>2</sub> and CO<sub>2</sub>.
- (4) Method 4 for determining stack gas moisture content to convert the flow rate from actual standard cubic feet to dry standard cubic feet.
- (5) Method 5 or Method 17 for concentration of particulate matter.
- (6) Method 9 for visible determination of the opacity of emissions as required in this permit in accordance with 40 C.F.R. 60.11.
- (7) Method 6, 6C, or 8 for concentration of SO<sub>2</sub>.
- (8) Method 7, 7A, 7B, 7C, 7D or 7E for concentration of nitrogen oxides.
- (9) Method 10 for determination of CO concentration.
- (10) Method 12 for determination of lead concentration.
- (11) Method 13B for determination of fluoride concentrations.
- (12) Method 25 or 25A for determination of VOC concentration.
- (13) Method 101A for determination of mercury emission rate.
- (14) Method 104 for determination of beryllium emission rate.

5. Continuous Emission Monitoring

Continuous emission monitors for opacity, oxygen, carbon monoxide, carbon dioxide, and sulfur dioxide shall be installed, calibrated, maintained and operated for each unit.

- a. Each continuous emission monitoring system (CEMS) shall meet performance specifications of 40 C.F.R. 60, Appendix B. The SO<sub>2</sub> CEMS sample point shall be located downstream of control devices for each unit.
- b. CEMS data shall be recorded during periods of startup, shutdown and malfunction but shall be excluded from emission averaging calculations for CO, SO<sub>2</sub> and opacity.

- c. A malfunction means any sudden and unavoidable failure of air pollution control equipment or process equipment to operate in a normal or usual manner. Failures that are caused entirely or in part by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.
- d. The procedures under 40 C.F.R. 60.13 shall be followed for installation, evaluation and operation of all CEMS.
- e. Opacity monitoring system data shall be reduced to 6-minute averages, based on 36 or more data points, and gaseous CEMS data shall be reduced to 1-hour averages, based on 4 or more data points, in accordance with 40 C.F.R. §60.13(h).
- f. Average CO and SO<sub>2</sub> emission concentrations, corrected for CO<sub>2</sub>, shall be computed in accordance with the appropriate averaging time periods included in Condition 3.
- g. For purposes of reports required under this permit, excess emissions are defined as any calculated average emission concentration, as determined pursuant to Condition 5. herein, which exceeds the applicable emission limit in Condition 3.

6. Operations Monitoring

- a. Devices shall be installed to continuously monitor and record steam production, furnace exit gas temperature (FEGT) and flue gas temperature at the exit of the acid gas control equipment. An FEGT to combustion zone correlation shall be established to relate furnace temperature at the temperature monitor location to furnace temperature in the overfire air fully mixed zone.
- b. The furnace heat load shall be maintained between 80% and 115% of the design rated capacity during normal operations. The lower limit maybe extended provided compliance with the carbon monoxide emissions limit and the FEGT within this permit at the extended turndown rate are achieved.

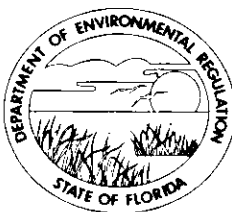
7. Reporting

- a. Fifteen (15) days prior notification of compliance test shall be given to the Florida DER district office.
- b. The results of compliance test shall be submitted to the Florida DER office within 45 days after completion of the test.

- c. The owner or operator shall submit excess reports for any calendar quarter during which there are excess emissions from the facility. If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period. The report shall include the following:
- (1) The magnitude of excess emissions computed in accordance with 40 C.F.R. §60.13(h), any conversion factors used, and the date and time of commencement and completion of each period of excess emissions (60.7(c)(1)).
  - (2) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace boiler system. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measure adopted (60.7(c)(2)).
  - (3) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments (60.7(c)(3)).
  - (4) When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report (60.7(c)(4)).
  - (5) The owner or operator shall maintain a file of all measurements, including continuous monitoring systems performance evaluations; monitoring systems or monitoring device calibration; checks; adjustments and maintenance performed on these systems or devices; and all other information required by this permit recorded in a permanent form suitable for inspection (60.7(d)).

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ  
GOVERNOR  
DALE TWACHTMANN  
SECRETARY

October 28, 1987

NRG Recovery Group  
C/O J. Michael Colvin  
Vice President  
LGM Engineers Constructors  
1330 West Peachtree Street  
Atlanta, Georgia 30367

Dear Mr. Colvin:

We are in receipt of your application for a waste-to-energy facility permit filed with this office on October 27, 1987. That application did not include a check in payment of the permit application fee. The fee for processing of this permit application is \$1,000.00.

Section 403.087(5), Florida Statutes (1986), provides that the Department shall not process a permit application unless the application is accompanied by the appropriate permit processing fee. In accordance with that section, we will hold your permit application until we receive your check. If you wish the Department to process the application, please forward the appropriate fee as soon as possible.

Sincerely,

C.H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

cc: Bill Thomas, SW Dist.