

**DRAFT**

Mr. Bill Thomas  
Bureau of Air Quality Management  
State of Florida  
Department of Environment Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301-8241

Dear Mr. Thomas:

Thank you for sending us a copy of the Technical Evaluation and Preliminary Determination for the proposed NRG/Recovery Group Inc. cogeneration facility near Okahumpka in Lake County, Florida. The project would be located approximately 70 kilometers east of Chassahowitzka Wilderness Area, a Federal class I area administered by the U.S. Fish and Wildlife Service. It appears that our comments on the application did not reach your office prior to the completion of the preliminary determination. Enclosed is a copy of our technical review performed on the original application. We have not changed it as the comments are still valid for the preliminary determination.

A summary of our findings follows. It appears that the FDER BACT determination for NRG is inconsistent with the past determinations made for the proposed Palm Beach County and Collier County resource recovery facilities. For example, in the Palm Beach County and Collier County reviews, the FDER determined dry scrubbing was BACT for acid gases control. However due to NRG's economic concerns and uncertainty associated with acid gas control technologies, the FDER states that more information is needed that would justify requiring this type of control for the NRG facility. We feel that dry scrubbing is BACT for acid gases control and should be required of NRG.

Our conclusions after review of the FDER preliminary determination remain the same. We do not feel that the air quality related values in Chassahowitzka Wilderness Area will be adversely affected by the proposed project. However, these comments along with the comments provided previously regarding the proposed control technology and air quality analysis should be addressed before the PSD permit is granted for the proposed project.

If you have any questions regarding the enclosed comments, please contact Bud Rolofson of our Air Quality staff in Denver at (303) 236-8765.

Sincerely,

Regional Director  
Region 4

Enclosure

bcc: Region 4: Air Quality Coordinator                      EPA Region IV  
Chassahowitzka: Refuge Manager      AQD-DEN: Rolofson

DER  
SEP 26 1986  
BAQM

Technical Review of Permit Application  
for Lake County Waste to Energy Facility

by

The National Park Service Air Quality Division  
for the U.S. Fish and Wildlife Service

NRG/Recovery Group Inc. (NRG) is proposing to construct a resource recovery facility on a site on Jim Rogers Road near Okahumpka in Lake County, Florida. This location is approximately 70 km east of Chassahowitzka Wilderness Area, a Prevention of Significant Deterioration (PSD) class I area administered by the Fish and Wildlife Service (FWS).

The purpose of the facility is to dispose of solid waste generated in the immediate area. The project will be a mass-burn facility with two 250 ton per day (TPD) refuse fired incinerator/boilers that will generate steam and approximately 12.3 megawatts of electricity. The emissions from the proposed facility are estimated as follows; 60.0 tons per year (TPY) of particulate matter (PM), 547.0 TPY of sulfur dioxide (SO<sub>2</sub>), 455.0 TPY of nitrogen oxides (NO<sub>x</sub>), 36.0 TPY of volatile organic compounds (VOC), 101.0 TPY of carbon monoxide (CO), 820.0 TPY of hydrogen chloride (HCl), 1.1 TPY of lead (Pb), 5.5 TPY of fluoride (F), 0.0001 TPY of beryllium (Be), 0.6 TPY of mercury (Hg), and 4.0 TPY of sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>). Under PSD regulations, these emission rates are considered significant for all except VOC, Be, H<sub>2</sub>SO<sub>4</sub> and HCl (which is not a regulated pollutant) and therefore require new source review. Following are our comments on the best available control technology, air quality and air quality related values analyses with respect to the proposed project's impacts on Chassahowitzka Wilderness Area.

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) ANALYSIS

The major sources of emissions at the proposed facility are the two associated boilers. Therefore, our review will focus on emission controls on these units. Our BACT review for the proposed boilers is similar to the reviews we performed for the proposed Collier County and South Broward County resource recovery facilities. These reviews were submitted to the Florida Department of Environmental Regulation (FDER) previously. We again reference the publication entitled, "Air Pollution Control at Resource Recovery Facilities". This document was published in May 1984 by the California Air Resources Board (CARB) and discusses resource recovery facilities in detail. As of 1984, all refuse burning facilities with applications pending in California are proposing control technologies that are the same as, or more stringent than, the guideline emission limits discussed in this report.

For a new major source, a BACT analysis is required for each regulated pollutant emitted in significant amounts. For the proposed facility, the following pollutants will be emitted in significant amounts and require BACT review: PM, SO<sub>2</sub>, NO<sub>x</sub>, CO, Pb, F, and Hg.

### Particulate Matter

NRG is proposing to use electrostatic precipitators (ESPs) to minimize PM emissions generated by combustion of the solid waste in the boilers. Each ESP will be designed to reduce the exhaust gas PM concentration to 0.03 grains per dry standard cubic foot (gr/dscf). NRG states that ESPs with an outlet grain loading of 0.03 gr/dscf are best available control technology for the proposed facility. This is the same rate that Collier County proposed as BACT in their recent PSD application for a resource recovery facility. However, the rate determined by the FDER to be BACT and specified in the draft permit for the Collier County facility was 0.02 gr/dscf. Therefore, as a minimum, NRG should also be required to meet the 0.02 gr/dscf rate. However, as we discussed in our review of the Collier County facility, we feel a 0.01 gr/dscf rate is BACT. Based on information provided in the CARB document mentioned above, an emission limit of 0.01 gr/dscf can be achieved with high efficiency control devices such as ESPs or baghouses. This is the guideline emission limit proposed by the CARB for new resource recovery facilities in California and should be considered as the BACT limit for Florida facilities as well. The 0.01 gr/dscf rate is also the rate specified in the Maine Department of Environmental Protection's recent license to Penobscot Energy Recovery Company for a resource recovery facility in Orrington, Maine. Therefore, we recommend the FDER specify 0.01 gr/dscf as the PM BACT limit for NRG.

### Sulfur Dioxide

NRG is proposing no control devices for limiting SO<sub>2</sub> emissions; rather, they are proposing the firing of low sulfur refuse as BACT for the proposed facility. The resulting BACT limit is 0.6 pounds per million Btu heat input (lb/10<sup>6</sup> Btu). As an alternative to the proposed low sulfur refuse firing, NRG discussed the spray dryer scrubbing system, which could achieve at least a 70 percent reduction in SO<sub>2</sub> emissions and a 90 percent reduction of acid gases. NRG decided against the spray dryer system because of the added costs associated with such a system. NRG estimated the incremental cost for SO<sub>2</sub> and acid gas removal at \$1,200 per ton of pollutant removed, and felt that such costs would impose an unreasonable economic burden on the residents of Lake County.

In North Broward County's recent application for a resource recovery facility, they pointed out that the EPA, in evaluating the costs/benefits of various control technologies, uses economic indicators such as dollars per ton of pollutant removed. North Broward County references \$1,250-\$2,000 per ton of SO<sub>2</sub> removed as the range the EPA considers as reasonable. Therefore, since the \$1,200 per ton rate quoted by NRG is less than the lower end of the EPA range, the costs associated with a dry scrubber system appears to be reasonable.

In addition, the emission guideline recommended in the CARB document is 30 ppm, which corresponds to an SO<sub>2</sub> emission rate of approximately 0.08 lb/10<sup>6</sup> Btu. To achieve this emission level, which is significantly more stringent than the rate proposed by NRG, flue gas controls such as wet or dry scrubbing are required. Dry scrubbing processes have been effectively employed at pilot and full-scale refuse burning facilities in Europe, Japan, and the United States. Wet scrubbers have also been employed at full-scale refuse burning

facilities. Also, applicants for two resource recovery facilities in Maine recently proposed the use of spray dryer scrubbers to minimize SO<sub>2</sub> and acid gas emissions. The resulting SO<sub>2</sub> emissions from the PERC facility referenced above were estimated to be 0.067 lb/10<sup>6</sup> Btu after the scrubbing. The SO<sub>2</sub> emissions from Regional Waste Systems' (RWS) proposed facility in Portland, Maine, were estimated to be 0.074 lb/10<sup>6</sup> Btu.

Finally, it is our understanding that a flue gas scrubbing system will be installed at the Palm Beach County resource recovery facility. In addition, for the Collier County resource recovery facility, the FDER made a preliminary determination that flue gas scrubbing or similar technology was BACT for control of acid gases. The FDER also indicated that the installation of an acid gas removal system would also provide control for SO<sub>2</sub> emissions. We assume that the FDER will make a similar determination for NRG and require flue gas scrubbing for the proposed facility. Therefore, because the flue gas scrubbing system required for control of acid gases will also reduce SO<sub>2</sub> emission, we recommend the FDER specify SO<sub>2</sub> limits for NRG that reflect the SO<sub>2</sub> reductions achievable with a flue gas scrubbing system, and are comparable with the above CARB limits.

#### Nitrogen Oxides and Carbon Monoxide

The two primary variables that affect the formation of NO<sub>x</sub> from resource recovery boilers are the temperature and the concentration of oxygen in the combustion zone. NRG is proposing design and good combustion practices as NO<sub>x</sub> BACT. Combustion controls include use of low excess air, limiting peak combustion temperature, and good air/fuel mixing in the combustion chamber. NRG determined that a NO<sub>x</sub> emission rate of 5.0 lb/ton (0.50 lb/10<sup>6</sup> Btu) represents BACT for the proposed facility. We agree with NRG that the proposed use of combustion controls represent BACT. However, based on information presented in the CARB report and other reports referenced in North Broward County's recent PSD application, we feel combustion controls can reduce NO<sub>x</sub> emissions to the 3.0 lb/ton or lower range. For example, on page 4-10 of North Broward County's PSD application it states that Camp, Dresser and McKee (1984) reported emission factors for five operating solid waste fired facilities in the United States ranging from 2.1 to 4.6 lb/ton. Three other facilities were permitted at a rate of about 3.0 lb/ton. The application also states that Henningson, Durham, and Richardson (1985b) surveyed eleven solid waste incinerators throughout the United States and found NO<sub>x</sub> emissions ranging between 1.1 and 4.7 lb/ton. In addition, A.D. Little's (1981) survey showed emissions to range from 0.7 to 4.4 lb/ton. Based on this information, we feel a 3.0 lb/ton or lower NO<sub>x</sub> emission limitation represents BACT.

CO emissions result primarily from incomplete combustion. NRG is proposing as BACT a combustion control system that will insure sufficient mixing of the solid waste fuel and air so that the emissions of products of incomplete combustion are minimized. We agree with NRG that the proposed combustion controls represent BACT for CO emissions from the proposed facility.

#### Other Pollutants

Other pollutants emitted from the proposed facility that require BACT review include, Pb, F, and Hg. In addition, although presently not a regulated pol-

lutant, significant amounts of hydrogen chloride (HCl) can be emitted from municipal incinerators and should be minimized.

Lead is emitted in the solid phase. Therefore, the ESPs proposed to control PM emissions will also control lead emissions. We agree that the proposed ESPs represent BACT for lead emissions.

Fluorides, and HCl are emitted primarily in the gaseous phase. NRG did not propose additional controls for these pollutants. However, assuming the FDER determines dry scrubbing is BACT for acid gas control, as they did for the Palm Beach County and Collier County resource recovery facilities, these emissions would be reduced by as much as 90 percent. We feel a dry scrubbing system or equivalent is BACT for these pollutants.

#### AIR QUALITY ANALYSIS

The ISCST model was used to predict maximum short and long-term air quality impacts in the vicinity of the proposed resource recovery project and in the Chassahowitzka Wilderness Area (CWA). The proposed project is predicted to add 4.3, 0.8 and 0.04 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) of  $\text{SO}_2$  for the 3-hour, 24-hour and annual averaging times to CWA. NRG states they are the only increment consuming source in the area. If this is true, these levels represent the total class I increment consumption at CWA. These levels represent 2%, 16%, and 17.2% of the 3-hour, 24-hour, and annual allowable increment, respectively. Background concentration levels were not provided in the permit application (but were assumed to be very low in the area). Therefore, total concentration (background plus increment consuming sources) levels in CWA could not be determined. Any future applications in this area should include a detailed cumulative analysis in order to keep track of increment consumption in CWA. Accurate annual average concentration values (from all sources) are essential in assessing potential air quality impacts in CWA.

We would like to know if NRG is indeed the only increment consuming source in the area. In 1981 we received PSD applications for the Florida Mining Portland cement plant located 7 miles from CWA, the Tampa Electric power generating facility located 56 miles from CWA, the Transgulf Pipeline Company petro products transfer terminal located 70 miles from CWA, the Conserve Inc. sulfuric acid plant located 97 km from CWA, the City of Tampa refuse to energy project located 89 km from CWA, and the Brewster Phosphates rock dryer fuel conversion plant located 100 km from CWA.

Maximum concentrations for Pb were calculated by ratioing the  $\text{SO}_2$  impact analysis results giving an annual and 24-hour averaging concentration value of 0.002 and 0.06  $\text{Mg}/\text{m}^3$ , respectively. No further analysis was done for Pb in CWA. The only non-criteria pollutants being emitted in significant amounts are Hg and  $\text{F}^-$ . The applicant did not do a modeling analysis for these pollutants.

On page 44 the applicant indicates no further modeling for  $\text{NO}_2$ , PM or CO was required because the maximum predicted concentrations for each pollutant was less than their significant impact levels. It appears the applicant is misinterpreting EPA's meaning of "insignificant". Referring to the significant

levels EPA states, "... since the 1977 Amendments provide special concern for class I areas, any reasonably expected impacts for these areas, must be considered irrespective of the 50 kilometer limitation or the above significance levels". (See June 19, 1978, Federal Register, Page 26398). Since the proposed facility is to be located near CWA, a class I area, the applicant should not be referencing the EPA significant levels, and should perform a cumulative air quality analysis including the proposed source and previously permitted sources for all pollutants from this facility subject to PSD review.

A level-1 visibility analysis was performed and indicated that the proposed project would not cause visibility impairment in CWA.

#### AIR QUALITY RELATED VALUES - ANALYSIS

The CWA is comprised mainly of estuarine salt marshes, tidal streams and shallow bays with a border of hardwood swampland. The refuge was established for the purpose of migratory bird conservation. The CWA provides habitat for 6 federally threatened and endangered species - the American alligator, the bald eagle, eastern brown pelican, eastern indigo snake, Florida manatee, and the green turtle.

The proposed project would add low amounts of SO<sub>2</sub> to the CWA. Without the background levels present in the area, it is difficult to determine what the impact on the resources of CWA would be. If the background levels are indeed low, the emissions from the proposed source would not adversely affect the resources. We would appreciate receiving any information FDER may have on the SO<sub>2</sub> levels in the area.

In the winter of 1983/84, a freeze destroyed the upper canopy of the black mangroves in CWA. This is a favorite nesting area for the federally listed endangered eastern brown pelican. Until these trees recover, the breeding population of eastern brown pelicans has been displaced north to Cedar Keys National Wildlife Refuge (Cedar Keys). Cedar Keys is already one of the major breeding areas for the eastern brown pelican. In 1983 a peak population of 1775 birds produced 1750 offspring, and in 1985, a peak population of 1500 birds produced 1050 birds.

Although Cedar Keys is a class II area, it is extremely important as a breeding ground. We would like to request that future PSD permit applications in the area of Cedar Keys be forwarded to our office for review, and address the effects of the proposed project on the resources of Cedar Keys.

#### CONCLUSION

Based on the information provided, we would not expect emissions from the proposed facility to adversely impact the air quality or air quality related values of Chassahowitzka Wilderness Area. However, we have several comments regarding the proposed control technology and air quality analyses that should be addressed before the PSD permit is granted for the proposed project.

LITERATURE CITED

A.D. Little, Inc. 1981. Municipal Incinerator Emission Estimates.

Camp, Dresser & McKee, Inc. 1984. Solid Waste Energy Recovery Facility Application for Power Plant Site Certification, Hillsborough County Board of County Commissions.

Henningson, Durham, and Richardson. 1983. Revised Application for Power Plant Siting, for the Third Boiler Expansion at the Pinellas County Resource Facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET  
ATLANTA, GEORGIA 30365

4APT-AP/lms

SEP 19 1986

Mr. C. H. Fancy, Deputy Chief  
Bureau of Air Quality Management  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32301

RE: Lake County Solid Waste Energy Recovery Facility  
PSD-FL-113

Dear Mr. Fancy:

This is to acknowledge receipt of your August 15, 1986, PSD preliminary determination for the above referenced facility to be located in Okahampka, Florida. By letter dated July 7, 1986, we commented on your PSD preliminary determination for the same facility employing acid gas control. In an addendum to that letter, we do not concur with the applicant's conjecture that municipal solid waste incineration with acid gas control is not economically feasible. Other facilities of this size have demonstrated that acid gas control using alternative incineration technologies is feasible (e.g., Collier County project). We are therefore recommending to the applicant that fluidized bed burning with acid gas control be studied for its economic advantage over the present proposal.

If you have any questions or comments, you may contact Michael Brandon, of my staff, at (404) 347-4253.

Sincerely yours,

*Bruce P. Miller*

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

DER  
SEP 22 1986  
BAQM



# Lake Region News

Published Weekly  
Eustis, Lake County, Florida

Rec'd 8/2/86  
DER  
BAQM

Duplicate Copy

## PROOF OF PUBLICATION

STATE OF FLORIDA,  
COUNTY OF LAKE:

Before the undersigned authority personally appeared Frederick C. Drew, who on oath says that he is General Manager of EUSTIS LAKE REGION NEWS, a weekly newspaper published at Eustis, in Lake County, Florida; that the attached copy of advertisement,

being a NOTICE in the matter of State of Florida Department of Environmental Regulations

in the Circuit Court, was published in said newspaper in the issues of:

August 16, 1986	19
19	19
19	19
19	19

Affiant further says that the said Eustis Lake Region News is a newspaper published at Eustis, in said Lake County, Florida, and that the said newspaper has heretofore been continuously published in said Lake County, Florida, each week and has been entered as second class mail at the post office in Eustis, in said Lake 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 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 the said newspaper.

Sworn to and subscribed before me this 16th day of August, A.D. 1986. My commission expires August 22, 1987.

Pub. Cost, \$ 18.52

*Frederick C. Drew*  
*Brenda Endres*

### STATE OF FLORIDA Department of Environmental Regulation Notice of Proposed Agency Action on Permit Application

The Department of Environmental Regulation gives notice of its intent to issue a permit to NRG/Recovery Group to construct two 250 ton per day incinerators that will burn municipal solid waste and wood chips. The project will be located on Jim Rogers Road, Okahumpka, Lake County, Florida. A determination of best available control technology (BACT) was required. Electrostatic precipitators were determined to represent BACT for this facility. However, the department has initiated rulemaking for municipal solid waste incinerators which could ultimately result in more stringent air emission limitations. Space will be provided to allow for the retrofit of additional air pollution control equipment, as may be required by rule.

This application was reviewed under Florida Administrative Code Rule 17-2.500, Prevention of Significant Deterioration. Emission of air pollutants, in tons per year, will increase by the following amounts:

PM	SO2	NOx	CO
60	256	456	412
VOC	Pb	Fl	Be
37	1.5	5.5	9.2xE-5

The maximum percentages of allowable PSB increments consumed by the proposed project will be as follows:

	Annual	24-Hour	3-Hour
Class I			
PM	<20	<10	N/A
SO2	<450	20	16
Class II			
PM	<5	5	N/A
SO2	5	23	10

Persons whose substantial interests are affected by the department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application 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:  
Dept. of Environmental Regulation  
St. Johns River District  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803  
Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301  
Leesburg Library  
204 N. 5th Street  
Leesburg, Florida

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. The comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

August 20, 1986

Mr. James D. Mins  
Withlatchoochee Regional Planning Council  
1241 S.W. 10th Street  
Ocala, Florida 32674

Dear Mr. Mins:

RE: Preliminary Determination - NRG/Recovery Group  
Waste-to-Energy Facility, Lake County

I wish to bring to your attention that NRG/Recovery Group proposes to construct a solid waste energy recovery facility in Lake County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, under the authority delegated by the U.S. Environmental Protection Agency, has reviewed the proposed construction under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21) and reached a preliminary determination of approval, with conditions, for this construction.

Please also be aware that the attached Public Notice announcing the preliminary determination, the availability of pertinent information for public scrutiny and the opportunity for public comment will be published in the near future in a newspaper of general circulation in Lake County. This notice has been mailed to you for your information and in accordance with regulatory requirements. You need take no action unless you wish to comment on the proposed construction. If you have any questions, please feel free to call Mr. Bill Thomas or myself at (904)488-1344.

Sincerely,

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

CHF/pa  
Enclosure

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

August 20, 1986

Mr. Ron Fahs  
State A-95 Coordinator  
Florida State Planning and  
Development Clearinghouse  
Office of Planning and Budget  
The Capitol  
Tallahassee, Florida 32301

Dear Mr. Fahs:

RE: Preliminary Determination - NRG/Recovery Group  
Waste-to-Energy Facility, Lake County

I wish to bring to your attention that NRG/Recovery Group proposes to construct a solid waste energy recovery facility in Lake County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, under the authority delegated by the U.S. Environmental Protection Agency, has reviewed the proposed construction under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21) and reached a preliminary determination of approval, with conditions, for this construction.

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Sincerely,

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

CHF/pa  
Enclosure

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

August 20, 1986

Lake County Board of County  
Commissioners  
315 W. Main Street  
Tavares, Florida 32778

Dear Commissioners:

RE: Preliminary Determination - NRG/Recovery Group  
Waste-to-Energy Facility, Lake County

I wish to bring to your attention that NRG/Recovery Group proposes to construct a solid waste energy recovery facility in Lake County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, under the authority delegated by the U.S. Environmental Protection Agency, has reviewed the proposed construction under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21) and reached a preliminary determination of approval, with conditions, for this construction.

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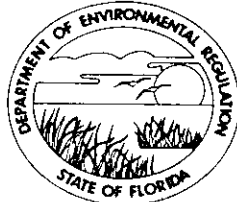
Sincerely,

*William Thomas*  
for C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/pa  
Enclosure

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR  
VICTORIA J. TSCHINKEL  
SECRETARY

August 20, 1986

Chassahowitzka National Wildlife Refuge  
Route 2, Box 44  
Homosassa, Florida 32646

RE: Preliminary Determination - NRG/Recovery Group  
Waste-to-Energy Facility, Lake County

I wish to bring to your attention that NRG/Recovery Group proposes to construct a solid waste energy recovery facility in Lake County, Florida, and that emissions of air pollutants will thereby be increased. The Florida Department of Environmental Regulation, under the authority delegated by the U.S. Environmental Protection Agency, has reviewed the proposed construction under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21) and reached a preliminary determination of approval, with conditions, for this construction.

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Sincerely,

*William Hanks*  
for C. H. Fancy, P.E.  
Deputy Chief  
Bureau of Air Quality  
Management

CHF/pa  
Enclosure  
cc: U.S. Fish and Wildlife Service Region 4

State of Florida  
 Department of Environmental Regulation  
 Notice of Proposed Agency Action  
 on Permit Application

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<u>PM</u>	<u>SO<sub>2</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>	<u>Pb</u>	<u>F1</u>	<u>Be</u>
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The maximum percentages of allowable PSD increments consumed by the proposed project will be as follows:

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<u>Class I</u>			
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SO <sub>2</sub>	<<50	20	16
<u>Class II</u>			
PM	<5	5	N/A
SO <sub>2</sub>	5	23	10

Persons whose substantial interests are affected by the department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General

Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application 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:

Dept. of Environmental Regulation  
St. Johns River District  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803

Dept. of Environmental Regulation  
Bureau of Air Quality Management  
2600 Blair Stone Road  
Tallahassee, Florida 32301

Leesburg Library  
204 N. 5th Street  
Leesburg, Florida

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING  
2600 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM  
GOVERNOR

VICTORIA J. TSCHINKEL  
SECRETARY

August 15, 1986

Mr. Erick Erickson  
Director  
Leesburg Library  
204 N. 5th Street  
Leesburg, Florida 32748

Dear Mr. Erickson:

RE: Revised Preliminary Determination - NRG/Recovery Group  
Waste-to-Energy Facility, Lake County

The Bureau of Air Quality Management needs to make the enclosed information available for public inspection pursuant to Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21, Paragraph (q)). A notice directing people to the library will be published in a local newspaper in the near future.

The information must be available upon request for a period of at least 30 days from the notice date. At the end of the period, we will forward to you a Final Determination on the permit application which must be available for an additional 30 days.

We appreciate your help in providing this valuable public service, and your assistance does not necessarily constitute an endorsement of the project. Should you have any questions, please call me at (904)488-1344.

Sincerely,

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

CHF/pa

Enclosure