

OGDEN MARTIN SYSTEMS, INC.
40 LANE ROAD
FAIRFIELD, N.J. 07007-2615

GARY K. CRANE, PH.D.
EXECUTIVE VICE PRESIDENT
(201) 882-7248

December 16, 1994

Mr. Clair Fancy
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Request for Permit Amendment
Ogden Martin Systems of Lake, Inc.
PSD-FL-113, AC 35-115379 as
Amended by AO 35-193817

Dear Mr. Fancy:

Please find enclosed a request to amend the referenced Ogden Martin Systems of Lake, Inc.'s (OMS Lake) PSD/Air Construction Permit.

As discussed in separate meetings with you and the Department's Orlando Central office, measurement of throughput on a short-term basis has led to substantial confusion regarding appropriate means for OMSL to demonstrate compliance with existing short-term (3 hour) permit averaging period requirements. The reliance on data from crane load cells, an uncertified measuring device subject to inherent limitations and inaccuracy, led to issuance of a warning letter by FDEP's Orlando office, following a September 1994 inspection. The present permit is silent on the means to monitor and document compliance with the stated throughput limit; the purpose of this amendment request is to eliminate the resulting confusion.

It is requested, in an approach consistent with a recent Department decision for the OMS of Hillsborough facility and Federal Standards at 40CFR 60 Subparts Ca and proposed Subpart Cb, that the federally enforceable PSD permit to construct (FL-113, AC 35-115379) be amended to reflect that steamload is the appropriate surrogate for refuse processing rate. Using steamflow is consistent with 40 CFR 60.38b [see also 40 CFR 60.58a subparagraph(h)(6)(I) and subparagraph (j)(1)] which pertains to compliance and performance testing of MWC's.

Crane load cell data is not specified by either permit or regulation, nor are these data intended for compliance monitoring purposes. To our knowledge, no other municipal waste combustor (MWC) in the State of Florida is required by permit or regulation to use crane load cells for operational monitoring.

No relaxation of any existing air or solid waste permit requirement is requested.

As detailed in our November 4, 1994 letter to FDEP's Orlando office, a copy of which was provided to FDEP's Mr. Howard Rhodes (see attached), crane weigh scales systems are subject to error due to various operating realities, such as refuse spillage back into the pit. Additionally, crane load cells are

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not certifiable by the National Bureau of Standards.

In contrast, and parallel to the precedent at Hillsborough County, we have proposed that truck weigh scales be used for accurate long-term measurement of waste throughput. Truck scales are static devices not subject to dynamic loading like refuse crane weigh cell systems and can therefore be certified. The USEPA has formally and clearly indicated its judgement that use of steam load is a more reliable indicator of refuse processing rate on a short-term basis than uncertified crane load cell devices.

Following is suggested language to amend PSD FL-113 (AC 115379):

1. Specific Condition No. 1.a. in Operating permit AO 35-193817 (refer to AC 35-115379 Condition 1b) currently reads:

"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) for each unit. The maximum throughput of biohazardous waste, for Unit 1 only, shall not exceed a total of 2.15 tons/hour and 51.60 tons/day.

Requested amendment to read (highlighted text to be added):

"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 **block** average for each unit **starting at midnight**). Steam flow shall be used as the surrogate parameter for all hourly and daily charging rate limitations. The steam flow shall not exceed 69,000 pounds per hour (3 hour block) per boiler as determined per 40 CFR Part 60.38b or any state adopted equivalent.

Compliance with the 576 tons per day facility-wide nominal processing rate shall be determined on basis of the 52-week rolling average weight of solid waste received and processed at the Facility. The truck weigh scale records shall be used for this purpose.

The maximum throughput of biohazardous waste, for Unit 1 only shall not exceed a total of 2.15 tons/hour and 51.60 tons /day."

Please note the requested 3 hour averaging period is both consistent with the existing PSD permit and more stringent than that specified by the USEPA under the proposed Emissions Guidelines 40 CFR 60.38b (i.e., 4-Hour block).

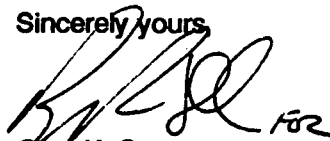
Your prompt attention to this matter is greatly appreciated as at present, OMSL is seeking to reasonably resolve the ongoing dialogue with FDEP's Orlando office on the above referenced warning letter regarding appropriate methods of measuring facility throughput.

To: C. Fancy - FDEP
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Enclosed please find a check for \$250 to cover permit application fees.

If additional technical information is required in support of this request, please let me know, or contact Mr. Jason Gorrie of OMSL at (904) 365-1611.

Sincerely yours


Gary K. Crane,
Executive Vice President

Attachment

cc: C. Boatwright
J. Gorrie
H. Rhodes
J. Treshler

J. Heron
C. Collins
G. Harper
G. Runyard

BEST AVAILABLE COPY

CHECK NO. 000343 DATE 12/16/94
VENDOR

NRG/RECOVERY GROUP, INC.

INVOICE NUMBER	INVOICE DATE	INVOICE DESCRIPTION	GROSS AMOUNT	DISCOUNTS, TAXES RETENTION	NET AMOUNT
121694	12/16/94	PERMIT AMENDMENT			250.00
TOTALS →			GROSS AMOUNT		NET AMOUNT 250.00

NRG/RECOVERY GROUP, INC.
40 LANE ROAD
FAIRFIELD, NJ 07006

CHECK DATE
12/16/94

000343
CHECK NUMBER

000343

50-937
213

The sum of \$250 and 00/100ths

PAY THIS AMOUNT

*****250.00*****

TO THE ORDER OF:

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

THE CHASE MANHATTAN BANK, N.A.
SYRACUSE, NEW YORK

Cary Ruff
[Signature]

Bureau of Air Regulation

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OGDEN MARTIN SYSTEMS, INC.



OGDEN MARTIN SYSTEMS, INC.
1000 W. UNIVERSITY AVENUE
ORLANDO, FLORIDA 32803
TELEPHONE (407) 227-7000
FAX (407) 227-7000

March 8, 1991

Mr. George Cheryan
Florida Department of Environmental Regulation
Central District
2319 Maguire Blvd., Suite 232
Orlando, FL 32803

SUBJECT: LAKE COUNTY WASTE TO ENERGY FACILITY
PERMIT NO. SO35-187342

Dear Mr. Cheryan:

Responding to the February 8, 1991, Operating Permit issued by Mr. A. Alexander of your office and as follow-up to our March 5, 1991 telephone conversation together with Mr. Brian Bahor of Ogden Projects, we request the following clarification be made to the subject permit. We are seeking to clarify use of the term nominal when used with the facility throughput rate of 528 tons per day.

As stated in the enclosed November 8, 1988 permit modification issued by Mr. A. Alexander on this project, the Lake County facility is designed to operate up to a maximum of 576 tons per day of solid waste, computed as an annual average.

[This clarification is requested to maintain consistency between the solid waste permit and conditions in the air permit for this facility (see attached), where the maximum throughput per municipal waste combustor unit shall not exceed 288 tons per day, i.e., 115% of the design rated capacity of 250 tons per day, per unit.]

Your assistance will be greatly appreciated in clarifying the written record to reflect that the actual maximum throughput would be 576 tpd, annual average. The nominal rate of 528 tons per day

Letter to George Cheryan

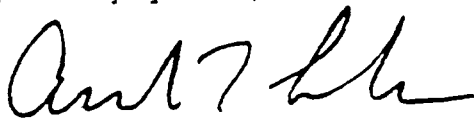
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March 8, 1991

cited in our solid waste permit application and your February 8, 1991 operating permit is essentially the mid-point of the 500 tpd to 576 tpd normal operating range of this facility.

Thank you for your continued assistance.

Very truly yours,



Andrew T. Lehman, Manager
Environmental Compliance

ATL: lkm
correspd.dft
lkm\d

Atta.

cc: R. Tedder (FDER)
C. Fancy (FDER)
G. Ball-Llovera (OMSL)
B. Bahor (OPI)