



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

August 14, 1992

MEMORANDUM:

SUBJECT: Proposal to Allow an Increase in the GEP Stack Height  
at the Dade County Resource Recovery Facility, Dade  
County, Florida.

FROM: Lewis H. Nagler *LN*  
Regional Meteorologist

TO: Gwenn Jacobs  
SO<sub>2</sub>/Particulate Matter Programs Branch

The Dade Resource Recovery Facility (RRF) has submitted a PSD application to add two new boilers and to modify the existing four boilers. Based on emission increases for the proposed project, only NO<sub>x</sub> and CO are subject to PSD review.

The existing boilers (units 1-4) vent through two 150 foot stacks. Two new 250 foot stacks will be built with dual liners (one boiler per liner). The current stacks must be removed in order to remove the existing control equipment which will be replaced by more stringent emission control devices. SO<sub>2</sub> emissions will be reduced from the existing four units from 1574.2 TPY to 858.4. Total emissions after the modifications to units 1-4 and the addition of two new boilers will total 1456.8 TPY.

In addition to the modifications to units 1-4, two new boilers will be added which will vent through a third 250 foot dual liner stack. The building dimensions of the new boiler building will be 146 feet high by 141 long by 136 wide. All stacks are within the influence of this building. The existing boiler building for units 1-4 has a height of 118 feet. GEP for the existing stacks is 295 feet. GEP for the new stacks will be 354 feet.

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In light of the June 29, 1992 memorandum from John Calcagni on credit for stack height increases due to the siting of new nearby structures, my position is that the existing stacks can be given credit for the stack height increase up to the 250 feet proposed. Mr. Calcagni's memorandum was silent on the issue of whether a stack must be built up to the calculated GEP height in order to be given additional stack height credit (note that the existing stacks were constructed to less than the old GEP height). Unless you provide me information to the contrary by September 4, 1992, I will proceed with notifying the Florida DER that the 250 foot stack height can be used in the modeling analysis, rather than the de minimis 213 foot height which our previous guidance would have required. Two figures showing profiles of the Dade RRF complex are enclosed.

enc.

cc: Dean Wilson (MD-14)