M E M O R A N D U M

TO: Anchor Glass Container Corp. – Air Quality Permitting File

FROM: Gloria Hunter-Barnes, Environmental Quality Division (EQD), Environmental Engineer

DATE: June 16, 2011

RE: EQD's Response to Comments from Anchor Glass Regarding Draft Air Construction Permit No. 0310005-012-AC

The Environmental Quality Division (Permitting Authority) received comments in a letter dated June 3, 2011 from Anchor Glass Container Corporation regarding Draft Air Construction Permit No. 0310005-012-AC (issued on April 20, 2011). The following are responses to each comment in the order that the comment was received. The comments will not be restated.

Responses to Comments Relating to the Technical Evaluation & Preliminary Determination

Comment 1

Response: Based upon the comment received, **Section I., Subsection B. Project** is changed as follows:

From: On August 18, 2010, Anchor Glass Container Corporation submitted an application for a construction permit for the modification of Glass Melting Furnace No. 4, located at Jacksonville Plant 07, 2121 Huron St., Jacksonville, Florida. The modification includes the complete replacement of the furnace glass contact and superstructure refractory bricks; the rearrangement of the furnace regenerator system from 4 passes to 2 passes; the relocation of the furnace binding steel to allow installation of additional insulation; widening of the combustion air ports; and changes in the furnace superstructure to allow future installation of oxy/fuel burners.

To: On August 18, 2010, Anchor Glass Container Corporation submitted an application for a construction permit for the modification of Glass Melting Furnace No. 4, located at Jacksonville Plant 07, 2121 Huron St., Jacksonville, Florida. The project includes the complete replacement of the furnace glass contact and superstructure refractory bricks; the rearrangement of the furnace regenerator system from 4 passes to 2 passes; the relocation of the furnace binding steel to allow installation of additional insulation; widening of the combustion air ports; and changes in the furnace superstructure to allow future installation of oxy/fuel burners. Comments to the draft air construction permit were received from Anchor Glass Container Corporation on June 3, 2011. Subsequently, the draft air construction permit was revised.

Comment 2

Response: Upon review, the Permitting Authority determined that the **Section II. Rule Applicability** statements are appropriate and complete, therefore no change was made based on the comment.

Comment 3

Response: Based upon the comment received, **Section III., Subheading <u>Record-keeping and Reporting Requirements</u>** is hereby changed as follows:

From: In order to provide reasonable assurance that applicable PSD significant emission rates are not exceeded with the modification and operation of Glass Melting Furnace No. 4, restrictions have been placed on the following parameters:

a. Process weight rate (including the percentage of cullet processed)
b. Glass pull rate
c. Heat input rate from natural gas and propane
d. Heat input from the electrical boost system

These restrictions are in the Emission Limitations listed above.

To: The restrictions placed on the following parameters have been retained from previous permits (Permit Nos. 0310005-004-AC and 0310005-006-AV) in order to provide reasonable assurance that applicable PSD significant emission rates are not exceeded with the modification and operation of Glass Melting Furnace No. 4:

a. Process weight rate (including the percentage of cullet processed)
b. Glass pull rate
c. Heat input rate from natural gas and propane
d. Heat input from the electrical boost system

These restrictions are in the Emission Limitations listed above.

Comment 4

Response: The Permitting Authority is requiring that annual stack test data (the most reliable data) be used for calculating and maintaining records of annual emissions for the PSD pollutants cited in accordance with Rule 62-212.300(1)(e), FAC. Therefore, the suggested change to **Section III., Subheading <u>Record-keeping and Reporting Requirements</u>** was not made.

<u>Responses to Comments Relating to the Draft Air Construction Permit</u>

Comment 5

Response: Based upon the comment received, **Section I., Subsection A. Project and Facility Description** is hereby changed as follows:

From: This permit is for the modification of Glass Melting Furnace No. 4 which includes the complete replacement of the furnace glass contact and superstructure refractory bricks; the rearrangement of the furnace regenerator system from 4 passes to 2 passes; the relocation of the furnace binding steel to allow installation of additional insulation; widening of the combustion air ports; and changes in the furnace superstructure to allow future installation of oxy/fuel burners.

To: This permit is for the modification of Glass Melting Furnace No. 4. The project includes the complete replacement of the furnace glass contact and superstructure refractory bricks; the rearrangement of the furnace regenerator system from 4 passes to 2 passes; the relocation of the furnace binding steel to allow installation of additional insulation; widening of the combustion air ports; and changes in the furnace superstructure to allow future installation of oxy/fuel burners.

Comment 6

Response: Upon review, the Permitting Authority determined that the rule applicability statements under **Section I., Subsection A. Project and Facility Description** are appropriate and complete, therefore no change was made based on the comment.

Comment 7

Response: The Permitting Authority agrees with the comment and has made the following change to **Section II., Subsection B. Specific Condition No. 7**:

From: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for a Title V Air Operating Permit with compliance records and test results, to the Permitting Authority, at least 90 days prior to the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid Title V operation permit to operate.
[Rule 62-213.420(1)(a), FAC and Rule 2.501, JEPB]

To: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for a Title V Air Operating Permit with compliance records and test results, to the Permitting Authority, at least 90 days prior to the expiration date of the construction permit. An applicant making timely and complete application for an operation permit shall continue to operate the source under the authority and provisions of any existing valid permit until the conclusion of proceedings associated with its permit application or until the new permit becomes effective, whichever is later, provided the applicant complies with all the provisions of subparagraphs 62-213.420(1)(b)3., FAC.
[Rule 62-213.420(1)(a)1. and (b)2., FAC and Rule 2.501, JEPB]

Comment 8

Response: The Permitting Authority references the origin and authority (i.e., the rule or regulation) of the applicable requirements contained in the specific condition. Therefore, the suggested changes to **Section III. Emissions Unit(s) and Conditions, Specific Condition Nos. 3, 4, 5 and 10** were not acceptable.

Comment 9

Response: The Permitting Authority agrees with the comment and has changed **Specific Condition No. 10** under **Section III. Emissions Unit(s) and Conditions** to the following:

From: PM and VE compliance testing shall be conducted concurrently and shall be conducted a minimum of 135 days prior to the expiration date of this permit. PM testing minimum sample volume shall be 25 dry standard cubic feet per run. VE testing shall be conducted for a minimum period of 60 minutes. Compliance testing shall be conducted while processing the minimum percentage of cullet, maximum natural gas heat input rate and maximum electric boost heat input rate used during normal operations.
[Rule 62-297.310(7)(a), FAC, Rule 62-297.310(4)(a)(2), FAC and Rule 2.1201, JEPB]

To: PM and VE compliance testing shall be conducted concurrently and shall be conducted a minimum of 135 days prior to the expiration date of this permit. PM testing minimum sample volume shall be 25 dry standard cubic feet per run. VE testing shall be conducted for a minimum period of 30

minutes. Compliance testing shall be conducted while processing the minimum percentage of cullet, maximum natural gas heat input rate and maximum electric boost heat input rate used during normal operations.
[Rule 62-297.310(4)(a)(2), FAC and Rule 2.1201, JEPB]

Comment 10

Response: The Permitting Authority agrees with the comment regarding the rule citation and has changed **Specific Condition No. 11** under **Section III. Emissions Unit(s) and Conditions** as follows:

From: SO_2 and NO_x compliance testing on the furnace shall be conducted a minimum of 135 days prior to the expiration date of this permit. Compliance testing shall be conducted while processing the minimum percentage of cullet, maximum natural gas heat input rate and maximum electric boost heat input rate used during normal operations.
[Rule 62-297.310(7)(a), FAC and Rule 2.1201, JEPB]

To: SO_2 and NO_x compliance testing on the furnace shall be conducted a minimum of 135 days prior to the expiration date of this permit. Compliance testing shall be conducted while processing the minimum percentage of cullet, maximum natural gas heat input rate and maximum electric boost heat input rate used during normal operations.
[Rule 62-212.300(1)(e)1., FAC and Rule 2.401, JEPB]

Comment 11

Response: The Permitting Authority references the origin and authority (i.e., the rule or regulation) of the applicable requirements contained in the specific condition in accordance with 40 CFR 70.6(a)(1)(i). Therefore, based upon the comment, the following change was made to **Specific Condition No. 12** under **Section III. Emissions Unit(s) and Conditions**:

From: In order to provide reasonable assurance that applicable PSD significant levels are not exceeded with the modification and operation of Glass Melting Furnace No. 4, restrictions have been placed on the following parameters:

a. Process weight rate (including the percentage of cullet processed)
b. Glass pull rate
c. Heat input rate from natural gas and propane
d. Heat input from the electrical boost system

These restrictions are in the Emission Limitations and Standards specific conditions listed above.
[Rule 62-212.300(1)(e), FAC, Rule 62-213.440(1)(b), FAC, Rule 2.401, JEPB and Rule 2.501, JEPB]

To: The restrictions placed on the following parameters have been retained from previous permits (Permit Nos. 0310005-004-AC and 0310005-006-AV) in order to provide reasonable assurance that applicable PSD significant emission rates are not exceeded with the modification and operation of Glass Melting Furnace No. 4:

a. Process weight rate (including the percentage of cullet processed)
b. Glass pull rate
c. Heat input rate from natural gas and propane
d. Heat input from the electrical boost system

These restrictions are in the Emission Limitations and Standards specific conditions listed above. [Rule 62-212.300(1)(e), FAC, Rule 62-213.440(1)(b), FAC, Rule 2.401, JEPB and Rule 2.501, JEPB]

Comment 12

Response: The Permitting Authority references the origin and authority (i.e., the rule or regulation) of the applicable requirements contained in the specific condition. Therefore, based upon the comment no change was made.

Comment 13

Response: The Permitting Authority is requiring that annual stack test data (the most reliable data) be used for calculating and maintaining records of annual emissions for the PSD pollutants cited. Therefore, no change was made based on the comment.

Conclusion

Draft Air Construction Permit No. 0310005-012-AC is re-issued with the changes noted above.