Ed - for your review & comment AA 10/8

Date: 10/8/96 10:29
From: Armando Sarasua PEN
Subject: Premier Services Corporation - Incompleteness Letter Review
To: Andy Allen PEN
CC: Ed Middleswart PEN

File#0450001001, Source ID# 0450001009 Finished Product Bins 1 & 2 Dust Collector

**Please advise** on the following comments/conclusions regarding Premier Services Corporation's (PSC) letter of September 25, 1996, a response to our incompleteness letter of September 5, 1996.

(1) Based on their letter, I shall put in the permit that the maximum allowable operating rate **is 13 Ton/hr**, and the maximum allowable yearly throughput is 113, 880 T/yr (13 T/hr X 8760 hr/yr). Note that these numbers are different from their application amounts of 19.5 T/hr and 170,820 T/yr.

O.K.

(2) PSC does not think that FAC Rule 62-296.320(4)(a)2 applies to the emissions coming from the bin vents. It is my opinion that this emission point(s) [FAC Rule 62-210.200(110)] is an integral part of a process where a chemical or physical change is taking place (the furnaces) and therefore the rule is applicable. As the rule is applicable, they have the choice of either testing for particulate matter or accepting a **5% VE standard.**

process wt. Table

O.K. for Bag House

(3) PSC thinks that emissions from the bin vents are fugitive emissions. FAC Rule 62-210.200(136) defines fugitive emissions. These emissions are NOT fugitives as they ARE passing through a vent(s). The pollutant in question (PM) is entrained in the air escaping from the bin vents. The vents are designed to allow the displaced air (and the entrained pollutant) to pass into the atmosphere.

The above are items **requiring consensus** on our part and discussion with PSC. Please advise ASAP as the clock is running on the permit. Hard copy of this memo to file.

permit could be considered incomplete; but

Since it is an emissions reduction project we need to find a way to expedite the const. permit to install the baghouse to recover the product. We have been allowing the process vent with no bag house for years and now they are going to make it better. No visible material is leaving the property line even without the bag house.

I Recommend issuing permit with the 5% baghouse opacity std.

Andy 10/8/96

Sounds good to me
Ed M
10/8

AMERICAN PREMIER, INC.

901 East Eighth Avenue
King of Prussia, PA 19406
Phone: (610) 337-1100
Fax: (610) 337-1111

Approved RKJ 10/7

September 25, 1996

Ed m 10/1

RECEIVED
SEP 30 1996
Northwest Florida DEP

Mr. Ed K. Middleswart, P.E.
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

**RE: Application for a Construction Permit**
**Premier Services Corporation**
**File No. 0450001001, Source ID 0450001009**

Dear Mr. Middleswart:

This letter is a response to your 5 September, 1996, correspondence concerning an application for a construction permit (application) for the Premier Services Corp. (PSC), Port St. Joe, Florida facility. In your correspondence you indicated that the application was incomplete and to provide the requested information needed to complete the application. Below are the items you have requested and the answer to any questions you may have had as follows:

1

- The maximum operating rate for the storage bins is 13 tons/hr., 6.5 tons/hr. of product from the two furnaces supplying the bins In calculating the maximum throughput rates, our consultant assumed that each of our three (3) furnaces (which is the feed to these bins) would be connected to these two (2) bins; however, one of these furnaces is out-of-service and not expected to be put back into service any time soon. In addition, this third furnace can not physically be connected to the bins.

  For the record, on page III, part 4-1, the maximum throughput of 20 tons/hr. was developed by calculating the maximum throughput of each furnace (6.5 tons/hr.) and rounding the number up to the nearest whole number (20 tons/hr.). On page III, part 8-1, the maximum throughput of 19.5 tons/hr. was developed by calculating the maximum throughput of each furnace (6.5 tons/hr.). Finally, the 4 tons/hr. was a maximum throughput provided on an initial specification sheet to the manufacturer of the dust collector for design purposes. This throughput was later changed to reflect the actual throughput rate (13 tons/hr.).

Th hr/yr
13*8760
= 113880 T/yr

- The equipment was installed approximately thirty-five (35) years ago. I would guess that these bins do not show up on the site layout plans you have on file because they

were not permitted sources. To the best of our knowledge, there has been no control equipment associated with these bins in the past. The filter building located adjacent to these bins house the process equipment that dewaters the magnesium hydroxide to form a magnesium hydroxide slurry by filtration, thus the filter building.

Process wt. Table

2

Is heat applied? If so, is this physical change. Crushing?

- PSC takes exception to the applicability of FAC Rule 62-296.320(4)(a)2 in this case. FAC Rule 62-296.320(4)(a)2 defines applicability as "any emission unit which processes raw materials to produce a finished product through a chemical or physical change." Be advised that the process associated with this permit application consists of a material transfer process, only. There is no raw materials being chemically or physically changed to produce a finished product. In fact, the process of producing this finished product transferred to these storage bins is permitted as sources 10PCY23000106 and 07, this rule is applicable at this point of the operation.

3

- PSC takes exception to the statement, "if the bins are being filled and particulate matter is emitted from the vent or stack on the bins, the emissions are not fugitives." The bins are filled with material using a conveyor or elevator, the emissions associated with this operation are those generated as the materials fill the bins within the bin. This would be defined as a fugitive emission because there is not a discernible vent or stack at this point. The vents associated with the bins are not for the collection of the emissions associated with the filling of the bin but are only a point for air being displaced by the filling of the bin to escape.

✓ You will be advised that as part of a PSC's Title V permit application, submitted June, 1996, Appendix C, provides a description of a compliance schedule that will be followed to reasonably prevent fugitive emission. These reasonable precautions to be taken include: a) the application of water to paved and unpaved areas accommodating vehicular traffic if a visible plume is observed at least 10 feet from the source; b) removal of particulate matter from buildings or work areas to prevent particulates from becoming airborne; and, c) enclosure or covering of conveyor systems where reasonable to do so. PSC does not consider it feasible to install dust collection equipment at these fugitive emission sources.

✓

- Your assumption that a "flop gate" is being used to direct the exhaust air from a filling bin to the dust collector is correct. Both bins can be filled at the same time. However, maximum emission associated with filling the bins at the same time would not change since the process would be divided between the two bins with a common discharge point (i.e., if the two furnaces were being operated at their maximum throughputs and each bin was being filled at an equal rate, 6.5 tons of product would be transferred to each bin per hour for a total of 13 tons/hr.). These emissions would be the same if one bin was being filled by both furnaces operating at their maximum throughput (13 tons/hr.).

- The acceptable range of the gauge reading in accordance with the manufacturers operation and maintenance manual is between 3" to 5" W.G. (inches of water).

If there are any additional questions or comments regarding this permit application, please contact me at your earliest convenience at (610) 337-1100, ext. 553.

Sincerely,

Thomas F. Turpin
Corporate Environmental Manager

cc. Steve Becker, KOP
Jim Williams, Port St. Joe

# Department of Environmental Protection

FILE COPY

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

SEPTEMBER 5, 1996

James O. Williams
Operations Manager
Premier Services Corporation
State Road 382 North
Port St. Joe, Florida 32465

File Number: 0450001001AC
Source I.D.: 0450001009

Dear Mr Williams:

This letter concerns your application for a construction permit for your facility in Port St. Joe, Florida. Your application is incomplete. Please provide the information below promptly. Evaluation of your proposed project will be delayed until all requested information has been received. [FAC Rule 62-4.070, FAC Rule 62-212.300(3)(a)2]

- Application gives a maximum operating rate for the storage bin as 20 Tons/hr on page III. part 4-1, Emissions Unit Detail Information. However, on page III. Part 8-1, Segment Description and Rate, the maximum hourly rate is given as 19.5 Tons/hr, and on Attachment F, Finished Product Bins,Dust Collector Specifications, Process, a rate is given as 4 Tons/hr - 222 Cu. Ft./Hr of feed. Please clarify the maximum operating rate which was used to design the dust collector on this emissions unit.

- A review of the site layouts on file do not reveal the existence of Finished Product Bins 1&2. When was this equipment installed? Has it not had any emissions control equipment associated with it before? What is the function of the filter building next to the bins?

- The particulate emissions standard of FAC Rule 62-296.320(4)(a)2 is applicable in this case. This would allow an emissions rate of 22.64 lb PM/hr, 99.16 T PM/yr uncontrolled. This would also require annual testing for particulate matter. Would you consider a waiver of particulate emissions testing if the baghouse can meet a 5% opacity VE standard.

- Attachment E - Fugitive Emissions Identification states that the dust collector is being installed to control potential fugitive emissions from these bins (1&2). Please note that if the bins are being filled and particulate matter is emitted from a vent or stack on the bins, the emissions are not fugitives. Precautions to prevent fugitive emissions are applicable facility-wide, especially for fugitive emissions from conveying equipment and materials transfer points.

- Attachment F, Finished Product Bins,Dust Collector Specifications, shows a screw conveyor feeding a bucket elevator which then fills the finished product bins. A flop gate seems to be used to direct exhaust air from a filling bin to the dust collector - is this correct? Can both bins be filled at the same time? If so, how does this affect emissions?

- Attachment G, Compliance With General Visible Emissions Standards, addresses daily measurement of pressure drop with a differential pressure gauge. What is the acceptable range of gauge readings for proper baghouse operation?

If you have any questions, please contact Armando Sarasua of this office at (904) 444-8364. When referring to this project, please use the file number and source I.D. number indicated.

Sincerely,

Ed K. Middleswart

Ed K. Middleswart, P.E.
Air Program Administrator

EKM:asc