PERMITTEE

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PERMITTING AUTHORITY

Florida Department of Environmental Protection
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399

PROJECT

Air Permit No. 1070005-066-AC
Minor Source Air Construction Permit
Palatka Mill

This is the final air construction permit, which authorizes the replacement of the No. 4 combination boiler (EU 016) fuel oil burners with natural gas burners, upgrade of the existing mechanical dust collection system, replacement of the existing steam turbine-driven induced draft fan-drive with an electric fan motor and fan and partial replacement of 28 continuous tube sections in the boiler's superheater section.

NOTICE AND PUBLICATION

The Department distributed a draft minor source air construction permit package on March 10, 2011. The applicant published the Public Notice in the Palatka Daily News on March 12, 2011. The Department received the proof of publication on March 22, 2011. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

Applicant

On March 23, 2011, the Department received comments from the applicant. The following summarizes the comments and the Department's response.

1. *Comment:* Section 1, Facility Description: The emissions unit list does not include all EU's listed on our current Title V permit. Those missing are 039-Bark Hog, 047-BSW lines 3, 5, 6, &7, 048-O2 DeLig system, and 050-Converting.

Response: These emission units have been added to the emissions unit list in Section 1.

2. *Comment:* Section 1, General Information – Proposed project description: The descriptions say that the existing steam driven induced draft fan-drive is being replaced with an electric motor. Actually, the fan will be replaced also (with no capacity increase), so we suggest it be revised as: "replace the existing steam-driven induced draft fan-drive with an electric fan motor and fan".

Response: The language in the General Information is revised to reflect the requested language.

3. *Comment:* Section 3, A – emissions unit description says that the unit continuously monitors for TRS emissions. This is incorrect; there is no TRS CEMS on the #4 Combination Boiler. Also, the last statement in the description which begins with "This project includes…" should be revised to include the replacement of the ID fan, and the partial replacement (28 tube sections) of the superheater.

Response: Reference to continuous TRS emissions monitoring has been removed from the description. Language adding the fan replacement and tube section replacement has been added to the description.

4. *Comment:* Section 3, Permit Condition A.2.c should be revised to read "Replace the existing steam turbine-driven on the Induced Draft (ID) fan for the No. 4 Combination Boiler with an electric motor ID fan."

Response: The language in Condition A.2.c is revised to reflect the requested language.

5. *Comment:* Section 3, Permit Condition A.4 lists an incorrect maximum heat input rate for bark/wood firing. The rate is listed as 564.0 MMBtu/hr, but should be 512.7 MMBtu/hr.

Response: The language in Condition A.4 is revised to reflect the requested language.

6. *Comment:* Technical Evaluation and Preliminary Determination (TEPD), Section 1, Paragraph 2 of the Project Description (top of page 9): The first sentence says that the replacement of the 28 tube sections of the superheater section was originally permitted in permit No. 1070005-045-AC. Actually, the modification to the dust collection system was part of that permit along with the gas conversion, and the superheater section modification should be referenced in the second sentence along with the ID fan replacement.

Response: This final determination will clarify the dust collection system was also part of the 1070005-045-AC project along with the gas conversion and superheater section modification.

7. *Comment:* TEPD, Table 1: The 'could have accommodated' emissions for CO and VOC are added to the baseline actual emissions. We suggest including it as a separate column to clearly identify the portions that are baseline emissions and could have accommodated emissions.

Response: The Department understands the permittee's concern for distinguishing the emissions. The determination has been revised to show baseline emissions and 'could have accommodated' emissions.

8. *Comment:* TEPD, In Paragraph 4 of Section 3. Department Review of the Technical Evaluation, it is stated, "The permittee considered the restored bark rate as 'could have accommodated' rate in its review of potential emissions." However, we excluded the restored bark rate from 'could have accommodated' because it is clearly related to the project. We suggest updating the sentence to read, "The permittee excluded the restored bark rate when determining the 'could have accommodated' rate in its review of projected actual emissions, as it is related to the project."

Response: The language in the TEPD was revised as requested by the permittee.

9. *Comment:* TEPD, Section 3, Paragraph 4: The first two sentences should be revised similarly to the second bullet above to reflect that the ID fan will also be replaced, not just the drive type.

Response: The determination will reflect the replacement of the existing fan with the ID fan.

10. *Comment:* TEPD, Section 3, Paragraph 5 states that the replacement of the 28 continuous tube sections of the superheater was previously permitted under permit no. 1070005-038-AC, PSD-FL-380. Review of this permit does not support this. While the replacement of tubes in the #4 Recovery Boiler (EU ID 018) was covered, there was no mention of tube replacement for the #4 Combination Boiler. However, this correction has no effect on the current permitting action which will authorize the superheater tube replacement.

Response: The superheater section modification was originally permitted under Air Construction Permit 1070005-045-AC as indicated in Comment 6.

The Department will update the TEPD and replace it in the draft documents available on the DARM website.

CONCLUSION

The final action is to issue the permit with the minor changes, corrections and clarifications as described above.