Florida Department of Environmental Protection
Northwest District
160 W. Government Street, Room 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

February 14, 2011

By Electronic Mail, Received Receipt Requested
BrianS@andersoncolumbia.com

Mr. Brian P. Schreiber, Secretary
Anderson Columbia Co., Inc.
Post Office Box 1829
Lake City, Florida 32056

Dear Mr. Schreiber:

This is to acknowledge receipt of your application for an air construction permit, DEP file number 7775064-008-AC, for a Lime Silo Addition at the Anderson Columbia Co., Inc., Plant #16 in Marianna, Jackson County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your application for permit is incomplete. Please provide the information listed below within 90 days of receipt of this letter. Evaluation of your proposed project will be delayed until all requested information has been received. References made below to "Application" refer to DEP Form No. 62-210.900(3), Effective 2/11/1999 and its instructions.

1. Please provide correct facility latitude and longitude coordinates from Application Section II, Subsection A., Facility Location and Type, Item 2, page 7. The ones that are listed in this application are the same ones that were determined to be incorrect in the application submittal for 7775064-007-AO.
2. Please provide the complete list of facility pollutants from Application Section II, Subsection B, Facility Pollutants, page 9. As required in the instructions, please provide "the identification code as listed in Appendix D of each pollutant the facility emits, or has the potential to emit, or, after any proposed construction or modification, would emit or have the potential to emit in a major amount; each pollutant for which the facility's emissions are, or would be, synthetically limited to less than a major amount…."
3. Please provide an updated Facility Plot Plan and Process Flow Diagram, from Application Section II, Subsection C., Facility Supplemental Information, Items 2 and 3, page 10. This project alters the supplemental information submitted with the application for 7775064-007-AO by adding the lime silo; therefore, the information should be updated accordingly. Please clearly identify the location of the new emission point on the updated diagrams.

4. Please provide the segment information required in Application Section III, Subsection C, page 14 (missing). As stated in the instructions, "the purpose of this section of the form is to provide information on the raw materials, processes, fuels, stored volatile organic liquids (VOLs), products and other activities associated with the emissions unit addressed in this section in a format consistent with the EPA Source Classification Code (SCC) system." Provision of this information may also help with the next item.
5. Please explain the origin of the emission factors used in Application Section III, Subsection D, Item 8, page 15. The PM/PM10 calculations use the emission factors of 0.003 grains/dscf and 0.001 grains/dscf, respectively, and AP-42 Table 11.12-2 is cited as the reference. However, the emission factors in Table 11.12-2 are in units of lb/ton of pollutant loaded, so it is not clear how this was converted to a grains/dscf emission factor. It will help to avoid confusion if the emission factor used corresponds with the SCC code listed in Subsection C, as described above.
6. Please also note in Application Section III, Subsection D, Potential Emissions Item 2, Page 15 that the correct Pollutant Regulatory Code is "NS," since there are no unit-specific emission limits associated with the lime silo. Also, Item 9, Emissions Method Code, is listed as "0," indicating that allowable emissions were used to estimate potential emissions. If AP-42 factors are actually used, then Item 9 probably should be either "3" or "4," depending on which emission factors are used.
7. Please submit an updated Operation and Maintenance Plan (OMP) as required by Application Section III, Subsection G, Item 7, page 17. The OMP should address proper operation of the baghouse, routine checks, and replacement criteria, as appropriate, including corrective actions to be taken in the event of a malfunction, such as, but not limited to: "In the event visible emissions are detected from the lime silo baghouse vent, its operation will be immediately stopped and appropriate actions taken to correct the problem."

As you are aware, 7775064-007-AO is currently under review by the Department. There is a potential opportunity to save your facility additional time and money by incorporating this revision for adding the lime silo into the pending operating permit. Two things are needed to make this possible. First, the construction and compliance testing of the lime silo would need to occur within a reasonable time period (the application indicates that construction could be completed by 3/15/11). Second, the Department would need a waiver of the 90-day clock for 7775064-007-AO, in writing, from the Authorized Representative. If we proceed with each permit separately, you will need to come back for an operating permit revision (another application and fee)

once the lime silo is constructed and tested. Please let us know how you would prefer to proceed.

Professional Engineer (P.E.) Certification Statement**:** Rule 62-4.050(3), Florida Administrative Code (F.A.C.), requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, at a minimum your response to the above should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page from the Non-Title V application form, DEP Form No. 62-210.900(3) (enclosed).

When referring to this project, please use the file number indicated above. The Department must receive a response from you within 90 days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-4.055(1), F.A.C.

If you have any questions, please contact Teresa Knepper at 850/595-0670 or teresa.knepper@dep.state.fl.us.

Sincerely,

/s/

Rick Bradburn
Air Program Administrator

RB/tk/c

c: E. Tony Williams, P.E.; Anderson Columbia: TonyW@andersoncolumbia.com
Scott Cleveland, Anderson Columbia: ScottC@andersoncolumbia.com
DEP Northwest District Branch Office, Panama City