AMERICAN PREMIER, INC.

901 East Eighth Avenue
King of Prussia, PA 19406
Phone: (610) 337-1100
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Armando – please draft appropriate response. AGT 11/12

November 4, 1996

Ed M — agreed comments reasonable. 11/12

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

RE: Draft Air Emission Permit
Premier Services Corporation
Air Permit No: 0450001-001-AC

Dear Mr. Middleswart:

Please accept this correspondence as Premier Services Corporation's (PSC) written comments to the draft Air Emissions Permit (Air Permit No. 0450001-001-AC) issued to the PSC facility located on State Road 382 N in Port St. Joe, Gulf County, Florida. This draft permit, upon final approval, will permit PSC to construct and operate a dust collector to limit particulate emissions from the #1 and 2 finished product storage bins.

PSC's comments are as follows:

- Specific Condition #8 states that "the Permittee (PSC) shall develop and implement the plan presented in Attachment G of the construction permit application to continuously monitor the performance of the dust collector. The finalized plan shall be submitted to the department for approval within 90 days of issuance of this permit."

  You will be advised that the preventative maintenance plan (plan) presented as Attachment G of the construction permit application does represent PSC's finalized plan. Therefore, PSC requests that the Department accept the plan provided as our final plan for approval with the below noted revision.

  PSC does not believe that on a monthly basis, the baghouses should be inspected for torn, obstructed or otherwise malfunctioning filters. By monitoring the baghouse's daily operating parameters (air pressure drop across the baghouse and qualitative observations of opacity from the dust collector vent), PSC believes that a torn, obstructed or otherwise malfunctioning filter will be so noted. If on a daily basis there is not a visible plume and the pressure differential is operating within allowable limits, one can assume the there are no filters torn, obstructed, or otherwise malfunctioning. PSC requests that these above mentioned monthly observations be excluded from the preventative maintenance plan.

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- Specific Condition #11 established the annual allowable particulate emissions at 0.1 T/yr. This value was provided in the permit application by PSC. The value was calculated using AP-42 emission factors based on the assumed process throughputs.

  Although the AP-42 emission factors are conservative, PSC would prefer to limit it's emissions based on the equipment's operational capacity rather than the assumed operating scenario to provide the Plant needed operational flexibility. Instead of using the AP-42 emission factors, PSC has calculated the annual particulate emissions using a grain loading standard of 0.02 grains/acf (assuming the inlet concentration is 20 grains or less actual cubic feet) provided by the baghouse's manufacturer. The particulate emissions from this source using this standard was determined to be 0.82 T/yr. Since these higher calculated emissions would provide the Plant needed operational flexibility, PSC requests that the particulate emissions of the source be increased to 0.82 T/yr. for Specific Condition #11.

- PSC request further clarification with regards to Administrative item #16. PSC does not believe that an operational permit is required for this source. As discussed in both the permit application for this source and the Title V permit application, this source is grouped with the other dust collectors at the Plant as a single emission unit (EU-09) in the Title V permit application.

  Submitting an operating permit within 75 days of completion of construction of this source would appear to be repetitive since this source along with the other permitted and unpermitted sources will become part of the Title V operation permit once issued. Therefore, PSC requests that the terms of this construction permit be effective until issuance of the Title V permit and the requirement to provided a operating permit application be waived.

Please take these above comments into consideration before issuing the final construction permit. If there are any questions or comments concerning these matters, please contact me at your earliest convenience at (610) 337-1100, ext. 558.

Sincerely,

Thomas F. Turpin

Thomas F. Turpin
Corporate Environmental Management

cc: Steve Becker, KOP
Robert Fox, P.E., ERM-South, Inc
Ron Olsen, ERM-South, Inc.
Jim Williams, Port St. Joe