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April 26, 1988

Mr. Bill Thomas, P.E. III  
Bureau of Air Quality Management  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Permit Number AC 23-139086  
Smelt Dissolving Tanks 5 & 6

Dear Mr. Thomas:

The purpose of this letter is to provide comments on areas of concern in the above-referenced permit for the Number 5 and 6 smelt dissolving tanks. I believe that the overriding concern of St. Joe Forest Products Company has been resolved by the Department's agreement to delete the reference to new source performance standards and instead to insert the previously agreed particulate emission limit of 0.45 lbs/3000 lbs. of BLS. However, there are a number of other concerns which need to be addressed, both in terms of the technical analysis by the staff and in terms of the permit itself.

COMMENTS ON THE PROPOSED PERMIT

We object to the finding in the description of the source that the Number 5 and 6 smelt dissolving tanks are subject to federal new source standards because new smelt dissolving tanks were installed in 1981 (without green liquor recirculation systems). We have submitted to the Department a reconstruction analysis showing that the cost of installing a new tank was less than 50% of the cost of installing a comparable new smelt dissolving tank system. The slight change in the liquor recirculation system had no effect on emissions or operations. Therefore under Rule 17-2.210, F.A.C., or under 40 CFR 60.15 these sources retain their status as existing sources subject only to the process weight table. Nevertheless we have no objection to meeting the stricter limit which we agreed to several months ago. The limit we are willing to accept in the permit is 0.45 lbs/3000 lbs. of BLS. The following comments will respond to the numbered specific conditions in the proposed permit:

2. We object to the insertion of new source performance standards as the emission limiting standard for the smelt dissolving tanks. Please refer to our comments in the paragraph above.

3. We also object to the NSPS limit required by this condition.

4. We object to the mass emission limit of 0.80 lbs/hr. There is no mass emission limit in Rule 17-2, F.A.C., and thus no authority for it being inserted in the permit.

5. We also object to the insertion of the mass emission limit in this condition for TRS emissions on the same basis expressed in our comments on Condition 4.

7. As we have previously worked out on other permits, we request the deletion in paragraph 7 of the reference to "continuously monitor". We have no objection to the requirement to monitor and record. We would request the deletion of the reference 40 CFR 60 in the last sentence of the paragraph because it is not applicable, as discussed above.

8. We have no objection to this condition if Condition 7 is changed as discussed above.

9. We request the deletion of the word "quarterly".

10. We request the deletion of the reference to 40 CFR 60 because it is inapplicable to an existing source.

11. We request the deletion of the reference to 40 CFR 60.

12. We request that the date for submitting an application for an operating permit be changed from June 11, 1989 to July 7, 1989.

14. We request this paragraph either be deleted or redrafted to reflect staff comments that no ambient or PSD

increment problems are expected to occur as a result of the issuance of this permit. We have submitted appropriate language for this paragraph and would request that be inserted or that this paragraph be eliminated, consistent with the handling of this issue for the Number 6 recovery boiler.

COMMENTS ON TECHNICAL EVALUATION

On page one at the end of the first full paragraph we would request that the Department review the capacity of each source which has an application pending and compare the requested capacity for that source with the capacity in the interim operating permits for those sources. We think the Department will find the statement inaccurate that the plan will result in increased production capacity at the mill, when compared with the interim operating permits.

On page 3, second paragraph, we believe that the ambient PSD increment analysis which was supplied to the Department demonstrates that the Number 5 and 6 smelt dissolving tanks will not cause or contribute to a violation of ambient air quality standards or PSD increments.

On page three, paragraph three, we believe that the reconstruction analysis supplied to the Department demonstrates that the No. 6 smelt dissolving tank replacement, is less than 50% of the cost of constructing a comparable new source and that the analysis was complete in the terms of the first step required by 40 CFR 60.15. It should be noted that additional information was not requested by the Department on that reconstruction analysis.

On page three, paragraph four, since reconstruction does not apply, there has been no rate change, there has been no significant change in the smelt dissolving tanks system, and there has been no increase in emissions, St. Joe asserts that NSPS does not apply.

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On page four, first paragraph (not indented), based upon the discussion regarding the previous page we believe the applicable particulate emission limit should be that previously negotiated and agreed to both by the Department and St. Joe, 0.45 lb/3000 lbs. of BLS. The applicable TRS emission is 0.048 lbs/3000 lbs dry black liquor solids as provided in Rule 17-2.600(4)(c)4.a., F.A.C. No mass TRS emission limit is applicable. We will accept TRS mass emission limits in this permit in spite of our strong reservations in order to expedite the issuance of this permit. However, we do not waive any rights to object to future inappropriate use of mass emission limits unless specific authority is shown.

On page 4, second paragraph, please delete the reference to "continuous" monitoring, except for where continuous TRS monitoring is required. This was discussed at length in the comments on specific condition number 7.

Page 4, third paragraph, because NSPS does not apply, delete the reference to 40 CFR 60.

Page 4, fourth paragraph, the final compliance date of May 12, 1989 is acceptable. Continuous monitoring is not required, nor is there any applicable certification requirement.

On page 6, second paragraph, delete the reference to 40 CFR 60.

On Page 5 under summary of emissions, we would again note that NSPS does not apply and the language should be modified accordingly.

In the Air Quality Analysis section as we discussed in our comments on the permit, there are no unresolved issues of ambient or increment consumption relating to this permit and that should be noted in the staff analysis in this section. We do concur that there is a remaining issue to be resolved as to the slaker.

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On page 6, Conclusion, we reserve the right to object to any later changes the Department or EPA might propose in this permit. We believe that we have demonstrated compliance with all applicable requirements of existing source emission limiting standards, ambient standards and in demonstrating that there would be no violation of PSD increments. We have also demonstrated that NSPS rules are not applicable. Accordingly the permit should be issued with existing source limits for all regulated pollutants. We believe that the Department has arrived at that conclusion based on telephone conversations last week. Should you have any questions regarding this or should we need to meet regarding this permit, we will be glad to answer any questions or meet with you on short notice.

Sincerely,

  
Terry Cole

TC:slt  
819.030

cc: Robert Nedley  
Lewis Taylor  
John Millican