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DER-BAQM May 12, 1988

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Mr. Clair Fancy
Deputy Bureau Chief
Bureau of Air Quality Monitoring
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Fl 32399-2400

Re: St. Joe Forest Products Co
Lime Kiln Construction Permits
AC 23-136376, AC 23-136377
AC 23-136328

Dear Mr. Fancy:

This letter is to submit comments on the proposed referenced permits.

The expiration date for all permits should be changed to April 27, 1990 to provide 30 days after getting the final test report to file the operating permit application.

Comments on Technical Evaluation

In the first paragraph and the last paragraph on page one, the statements that freshwater and/or caustic soda will be used to control SO₂ are incorrect. Any effect on SO₂ is incidental and may be beneficial but SO₂ is not a regulated pollutant for lime kilns and there is no requirement to control. Please delete SO₂ from these paragraphs.

On the second page under Rule Applicability in the sixth paragraph it should be clear that the SO₂ requirements are as they are imposed by PSD and the permit fee.

On page three in table 1, total potential SO₂ emissions are shown as 93.0 TPY. This is an error. As shown in the emission calculations (P4-7) submitted with the permit applications, the total potential SO₂ emissions from incinerating TRS is 31.03 tons per year which is less than 40 TPY. SO₂ modeling, though not required of the lime kilns, has been done and the results

indicate that the facility is not expected to cause or contribute to any SO₂ PSD increment or ambient air quality violation.

On page four in paragraph one, the visible emission standard is established at less than 20% opacity. St. Joe Forest Products Company currently is operating the lime kilns under operating permits AO 23-27171, AO 23-27172 and AO 23-27173. These permits have specific condition number 25 which reads as follows:

If the Department observes visible emission in excess of 20% opacity it shall be considered good reason to believe that the applicable mass emission standard is in danger of being violated. The permittee shall be required to run a special compliance test in accordance with Florida Administrative Rule 17-2.700(2)(b). Such test shall be conducted within 14 days after the Department has notified the permittee of the applicability of this permit condition.

We request that this permit condition be incorporated in these three permits.

Paragraph five on page four is incorrect and should be deleted.

In the first paragraph on page six it appears that the word "violation" should have followed "standard"; please change accordingly or explain to us. The additional modeling mentioned in this paragraph has been completed and submitted to the department.

Comments on Draft Specific Conditions

Specific conditions 1, 2, 5, 7, 8, 9, 10, 11, 13 and 15 are acceptable as written.

Specific Condition 3 - The BTU content of fuel oil and gas varies, please delete the volume numbers and use MMBTU numbers only in this specific condition.

- Specific Condition 4 -
- a) Acceptable as written
 - b) Request addition of S.C. 25 from the current operating permits

- c) Substitute MMBTU numbers for mass numbers

- Specific Condition 6 -
- a) Acceptable as written
 - b) Request addition of S.C. 25 from current operating permit
 - c) Acceptable as written

Specific Condition 12 - Acceptable as written except all that the tests will show is before and after SO₂ emissions.

Specific Condition 14 - In the last sentence please delete "until its expiration date". Change to read "in accordance with" F.A.C. Rules 17-2 and 17-4.

The comments on specific conditions are intended to apply to all three lime kiln draft permits.

We hope that this will be sufficient to quickly process and issue the permits so that we may get about our responsibility of reducing TRS emissions for all identified sources at the facility within the time frames allowed.

Sincerely,


Terry Cole

TC:slt
819.070

cc: Robert Nedley
John Millican

Lewis Taylor
Bill Thomas
Betsy Pittman