

## Koerner, Jeff

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**From:** Buff, Dave [DBuff@GOLDER.com]  
**Sent:** Monday, January 29, 2007 3:40 PM  
**To:** Koerner, Jeff  
**Cc:** dgriffin@ussugar.com; pbriggs@ussugar.com; Booth, Claire  
**Subject:** RE: Comments on Draft Permit for Boiler 8 Heat Input Increase

Jeff, in regard to the first comment, the 7% O2 goes specifically with the 270,000 dscfm, as noted in the application form. This is specified this way to be consistent with the Boiler MACT CO limit, which is specified at 7% O2. However, the acfm is given in the application form is actually at 5.5% O2, which is the typical actual oxygen content of the flue gas stream.

Your other two comments are correct and acknowledged. On the PM limit, I had used the 1-hour max heat input of 1185 MMBtu/hr, and this just happened to equal 29.6 lb/hr, hence my confusion. The 26.9 lb/hr is correct for 1077 MMBtu/hr.

Thanks for the help on this!

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-----Original Message-----

**From:** Koerner, Jeff [mailto:Jeff.Koerner@dep.state.fl.us]  
**Sent:** Saturday, January 27, 2007 2:39 PM  
**To:** Booth, Claire  
**Cc:** Buff, Dave; dgriffin@ussugar.com; pbriggs@ussugar.com  
**Subject:** Comments on Draft Permit for Boiler 8 Heat Input Increase

Claire,

Page 5 of 16, EU Description: The correct actual oxygen content is "5.5%".

Response: The application submitted for this project identifies the maximum flow rates as 395,000 acfm and 270,000 dscfm based on the maximum 24-hour heat input rate and 7% oxygen. I don't plan to make a change unless I hear back from you.

Page 7 of 16, Condition 7e, PM Standard: The correct mass emissions rate is 29.6 lb/hour and not 26.9 lb/hour. Response: The first paragraph in Condition 7 states, "The mass emission rates (pounds per hour) are based on

the maximum 24-hour heat input rate." The new 24-hour heat input rate is specified as "1077 MMBtu/hour". So, the mass emissions rate would be:  $(0.025 \text{ lb PM/MMBtu})(1077 \text{ MMBtu/hour}) = 26.9 \text{ lb/hour}$ . Tests must be conducted within 90% of permitted capacity, which is defined in this permit as the 24-hour heat input rate (1077 MMBtu/hour). I don't plan to make a change unless I hear back from you.

Page 16 of 16, Conditions 2-4, Bagacillo Cyclone: This was originally built in 1941 and operation will not change as a result of the Boiler 8 heat input increase. You request that the opacity standard be removed and that the unit remain as an unregulated unit. There are preliminary plans to replace this unit. A new application will be submitted to authorize any construction.

Response: I plan will remove the opacity standard and V.E. testing requirement. This will require a revised draft permit for publication.

I've prepared the revised draft package based on my responses above. Please let me know if you agree with the above.

Thanks

Jeff Koerner, BAR - Air Permitting North  
Florida Department of Environmental Protection  
850/921-9536