



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

May 4, 1998

RECEIVED

MAY 06 1998

BUREAU OF
AIR REGULATION

Mr. John B. Koogler, Ph.D., P.E.
Koogler & Associates
4014 NW Thirteenth Street
Gainesville, Florida 32609

Re: Florida Crushed Stone company, PA 82-17

Dear Mr. Koogler:

Please see the attached Memo from John Reynolds is response to your letter dated March 30, 1998. You may wish to discuss the matter with the Bureau of Air Regulation.

Sincerely,

Hamilton S. Oven
Hamilton S. Oven, P.E.
Administrator, Siting
Coordination Office

Attach:

cc: John Reynolds
David Zell

Florida Department of
Environmental Protection

Memorandum

TO: Buck Oven
THRU: Al Linero *Al Linero 4/8*
FROM: John Reynolds *JR*
DATE: April 8, 1998
SUBJ: Florida Crushed Stone/Central Power & Lime
Request for Amendment of Annual Testing Requirement
PSD-FL-090/PA 82-17

DEPARTMENT OF
ENVIRONMENTAL PROTECTION
APR 9 1998
SITING COORDINATION

The request is made for amendment of the annual testing requirements for the cement kiln and power plant such that there would be no specific test requirements for the power plant when operating alone. The justification given in the March 30 letter is based primarily on two factors: (1) the cement kiln and the power plant are operated jointly 97% of the time, and (2) there are no New Source Performance Standards that apply to the power plant.

Before the PSD permit was issued, the EPA made a determination (see attached letter dated January 27, 1983) stating that NSPS applicability would be triggered by any physical or operational change resulting in an increase in emissions of a pollutant regulated under 40CFR60, Subpart Da. The EPA stated that, although the relocation and rebuilding of this very old boiler ("1944 model") did not alter its status as an existing source, it would be considered as a modified source (subject to Subpart Da) if its emissions in the new location are higher than those at the former location. I did not find evidence in the file as to whether a comparison of emissions at the former location was ever made. Nonetheless, subsequent increases in heat input to the boiler have occurred of a magnitude sufficient to conclude that actual emissions must have increased at the relocated site relative to the former site. Consequently, the Department should re-examine NSPS applicability for this facility (perhaps during the review of their Title V permit), and at the very least require annual testing of the boiler operating alone.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4AW-AM

JAN 27 1983

Mr. Clair Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER

DAQM

Dear Mr. Fancy:

This letter is in answer to your letter of January 5, 1983 in which you requested an applicability determination under 40CFR Part 60 for an electric steam generating unit.

As you stated in your letter, the situation involves an application to construct a 125 megawatt electric co-generating plant in conjunction with a Portland cement plant. Approximately 100 megawatts will be sold on the Florida electric power grid. The boiler was operated in another state from 1944 to 1977 and has been rebuilt, however the applicant contends that the changes were not of sufficient magnitude to be a reconstruction as defined in 40CFR60.15. Your basic question is whether the proposed power plant would be subject to 40CFR60, Subpart Da?

Based on the information supplied, the power plant would not be subject to Subpart Da, however, we would encourage you to thoroughly investigate the applicant's contention that previous changes were not of sufficient magnitude to be a reconstruction under 40CFR60.15. You might want to ask for cost records from the applicant that would support his contention. I am also enclosing two EPA memorandums which discuss a reconstruction applicability determination previously made for a nitric acid plant. The important point to note in this determination is that a plant cannot be classified as a relocated facility (i.e. existing facility) if the facility is constructed by combining components from two or more existing facilities. If the proposed power plant is constructed by using components from two or more existing units, then the provisions of 40CFR60, Subpart Da would apply.

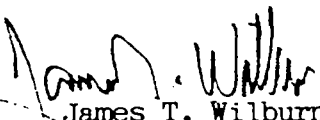
In addition, under the "modification" section (40CFR60.14), any physical or operational change in an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of Section 111 of the Clean Air Act. Upon modification, an existing facility shall

become an affected facility for each pollutant to which a standard applies and for which there is an increase in the emission rate to the atmosphere. We recommend that previous emission data be obtained to insure that there will be no increase in emissions which would trigger the modification provision of 40CFR60.

We also note from your letter that the power plant may be operated when the cement plant is down, therefore, we recommend that during the compliance demonstration, testing should occur during all modes of operation.

If we can be of further assistance in this matter, please call Mr. Brian Beals of my staff at 404/881-4901.

Sincerely,



James T. Wilburn, Chief
Air Management Branch
Air & Waste Management Division

Enclosure