



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

July 5, 1988

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division
U.S. EPA - Region IV
345 Courtland Street, Northeast
Atlanta, Georgia 30365

Dear Bruce:

This letter is in response to EPA's June 14, 1988, letter to Gardinier, Inc., concerning the modification to PSD permit PSD-FL-026. We had assumed that the ultimate acceptance of the representative period for actual emissions is FDER's responsibility (see attached letter dated July 27, 1987).

We would like to have clarification regarding the modified SO₂ limits since 32.4 lbs/hr (higher than our limit of 31.8 lbs/hr) does not equate with "458.4 lbs/day or 83.7 tons/year" (unless a 14 hour day is assumed). Should "or" be "and" since an annual standard alone is not considered to be federally enforceable?

Your response to these comments will be appreciated.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/plm

Attachment

cc: W. Thomas, S.E. District
J. Campbell, EPCHC
E. O. Morris, Gardinier



ATLANTA, GA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DER

JUL 29 1987

BAQM

JUL 27 1987

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: Gardinier Inc. - Proposed No. 5 DAP Plant Modification

Dear Mr. Fancy:

This is in regard to your letter of June 29, 1987, regarding Gardinier's response to FDER comments on their application of May 26, 1987. In our review of the application submitted to EPA on June 2, 1987, we had questions as to the use of actual emissions for netting calculations as addressed in your June 8, 1987, letter to Gardinier. Therefore, their response of June 22, 1987, is crucial in determining the acceptance of their proposed actual emissions decreases.

In their proposal, 1979 actual emissions are used for TSP and 1981 actual emissions are used for SO₂. The regulations state that actual emissions are generally the most recent two year average of actual emissions. Therefore, the company's use of highest actual emissions in two separate years over a ten year period does not appear to represent actual emissions at this facility. We would assume that a contemporaneous and continuous time period would be used in assessing actual emissions from this source. Therefore, if the years 1979 and 1981 are the boundaries of the continuous time period a three year average should be used. However, the ultimate acceptance of the representative period for actual emissions is FDER's responsibility.

If you have any comments or questions regarding this letter, please contact Mr. Michael Brandon at (404) 347-2864.

Sincerely,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

Copied: John Reynolds
Miguel Flores
CHF/BT
Bill Thomas - SW Dist

7/31/87