# MEMORANDUM

**DATE:**      November 13, 2008

**TO:**        Al Linero, P.E. - FDEP

**FROM:**      Diana M. Lee, P.E.              **THRU:** Sterlin Woodard, P.E.

**SUBJECT:**   EnviroFocus Technologies, LLC. PSD Construction Permit Application

On October 15, 2008, the EPC received a copy of EnviroFocus' response to the Department's Request for Additional Information letter, dated September 12, 2008. Based on our review of the response, we have the following comments/questions:

1.  According to EnviroFocus, as stated on Page 6, Section 2.31 of the Application, molten lead from the reverb Furnace will be conveyed to the Refining Kettles through channels called launders.   In response to EPC's Question #1, EnviroFocus stated that the launders will be heated by natural-gas fired pipe burners.  There will be 3 pipe manifolds with a maximum capacity of 150,000 BTU/hr each.  Manufacturer's information was provided in Attachment K.  EPC staff reviewed Attachment K, in which it shows on Section 4.2, a table with information for three Line Burner assemblies with a 1.5, 2 and 3 inch inlets with a corresponding maximum BTU/hr for each depending on the % primary air in the premix. The lowest BTU/hr value is 170,000.  In addition, Figure 6 shows different pipe sizes with a corresponding cubic feet per hour value.

    Pursuant to Rule 62-4.070(3), F.A.C., please clarify and provide specific information on the line burner assembly, that includes the specific pipe size, that will be used for the pipe burners to heat the launders.  In addition, since the lead will be in molten state, it is reasonable to believe that lead emissions will be emitted from the molten lead in transit from the reverb furnace to the refining kettles.  Please explain if there are emissions associated from this operation (tapping), and if so, please calculate these emissions and re-submit the calculations in accordance with 62-4.055(1), F.A.C and Rule 62-4.070(1), F.A.C., and revise the Application accordingly.

2.  In response to EPC Questions 3-5, EnviroFocus provided an explanation on the emissions inventory in Appendix B.  According to EnviroFocus, Appendix B of the permit application consists of several parts.  The first part is a spreadsheet consisting of 18 tables showing how the future actual and potential emissions from the facility were estimated.  Following those tables, is a set of spreadsheets that show how the baseline emissions were developed.  The test data used in this Section is from previous tests performed at the Tampa facility.  The baseline emissions were calculated over a 24-month period of operation at the Tampa facility using emissions factors from stack tests at the Tampa facility over a five year period to determine PSD applicability.

    EPC review of the spreadsheet titled "Baseline Emissions and Comparison with PSD Threshold" shows under pollutant SO2 an Emission Unit titled "Sulfur refinery usage". Similarly, under NOx, there is an Emission Unit titled "Niter refinery usage".  The current Title V Permit, Permit No. 0570057-016-AV, does not include or reflect either one of these operations at the Tampa facility.  Also, under PM/PM10 and Lead, emission unit "Breaker

Fugitives", emissions were calculated to be 4.58 TPY and 0.058 TPY, respectively. In accordance with Rules 62-210.200(36)(b) and 62-210.370(2)(d), F.A.C., baseline actual emissions must be calculated over a 24-month period in which the emission unit at the Tampa facility actually emitted the pollutant using site-specific emission factors based upon all stack test conducted at the Tampa facility during at least a five year period encompassing the period over which the baseline emissions are being computed.

Pursuant to Rule 62-4.070(1), F.A.C., please provide an explanation on the sulfur refinery and the niter refinery usages, and the basis for the emission factor and 24-month production values. Also, for the breaker fugitives, please explain the basis for the PM/PM10 and lead emission factors and the 24-month production value. Pursuant to Rule 62-212.400, F.A.C., please re-evaluate and re-submit the "Baseline Emissions and Comparison with PSD Threshold" calculations, as part of the PSD applicability analysis, and revise the Application accordingly.