From: Frank Burbach
To: Read, David
Subject: (Archived w/ Attachments) EFT Reallocation of SO2 Allowable Emissions
Date: Wednesday, June 27, 2012 12:44:13 PM
Attachments: image001.jpg

David,

Per your request, this email summarizes the permit changes EnviroFocus would like to request. As I mentioned on the phone, the expansion project for which DEP issued PSD Permit No. PSD-FL-404 (File No. 0570057-020-AC) is nearing completion. Recently, the plant discovered that there are SO2 emissions at the Hygiene Stack that were not accounted for when the PSD avoidance limits were established in the permit. The Hygiene Stack serves the hoods that capture the tapping and charging emissions from the furnaces (process fugitives) in addition to the refining emissions from the kettles. However, the SO2 limit of 7.94 lb/hr, established in Condition C9 of the permit, only accounted for the SO2 emissions from the refining kettles. Therefore, EnviroFocus would like to have the limit increased to accommodate the SO2 emissions present in the process fugitive gases. In order to maintain compliance with the overall plant-wide PSD-avoidance limit, EnviroFocus proposes to reduce the SO2 limit on the Process Stack, which serves the directly-evacuated emissions from the furnaces, such that the total SO2 emission limit remains the same. The SO2 emission limit on the Process Stack is currently listed in Condition B15 as 194.3 lb/hr.

Based on plant's analysis, proper operation of the furnaces should limit the fugitive SO2 emissions to 2% of the total uncontrolled emissions produced by the furnaces, which was estimated in the PSD permit application to be 1669.6 lb/hr maximum. This results in a maximum SO2 emission rate from process fugitives of 33.39 lb/hr. Therefore, EnviroFocus would like the limit on the Hygiene Stack to be revised to 41.33 lb/hr (7.94 + 33.39). The limit on the Process Stack would then be reduced to 160.91 lb/hr (194.3 – 33.39). Evidence from the CEMS on the Process Stack indicates that this new limit is readily achievable.

As we discussed earlier, EnviroFocus will begin preparing the appropriate permit application package immediately, but would like Florida DEP's direction as to what type of application and accompanying documentation is needed for this request. Please feel free to contact me if you need any additional information.

Thanks,

Frank

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