

Memorandum

Florida Department of
Environmental Protection

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BUREAU OF
AIR REGULATION

To: Al Linero
John Reynolds

February 3, 1999

From: Jerry Kissel 

Subject: Coronet Industries, Project 0570075-009 AC (Kilns 6 & 7, emission unit 005)

Ref: My prior memo to Al Linero on this subject January 8, 1999

Since my memo, we have learned that the oil burners, fuel tank, etc. have been removed and the kilns can only fire natural gas.

If you believe it is permissible to allow Coronet to surrender their past construction permit, I believe it would be reasonable for us (Southwest District) to issue a new construction permit for an increase in production and fuel use (natural gas only). Note that this change does not appear to meet the definition of modification under 210.200(188)(a)2 which says that "...a change in the method of operation [i.e., a modification] shall not include an increase in the hours of operation or in the production rate..." It appears that the increase in natural gas usage would also be allowed, although not specifically mentioned in the above sentence as it is integrally tied to the production rate.

We've set this up as your call, though, so please let me know what you think. EPC may have some further thoughts on this also - Coronet visited EPC on this subject since my 1/8/99 memo.

c S. Cullen, Koogler & Associates
R. Kirby, EPC
F. Sweat, Coronet
W. Schroeder, DEP