

TO: Al Linero

August 18, 1998

FROM: Jerry Kissel 

RECEIVED

REF: Coronet Industries, Kilns 6 & 7  
0570075, e.u. 005, project -009

AUG 20 1998

BUREAU OF  
AIR REGULATION

We'd appreciate your input on a PSD situation as follows:

Permitting history

- o Various operating permits since 1978
- o First construction permit, 2/95 (AC29-259884, later renumbered to 0570005-006-AC) which involved physical changes (a modification) and a production limit of 24.3 tons/hr.
- o An operating permit was issued 7/95 for a maximum of 19.8 tph, based on maximum rates achievable during the AC period.
- o Current application (project 009) is a modification, at the least because it requests an increase in fuel use from 0570005-006-AC. It also requests an increase in production rate to 24.3 tph.

Question

Is the current application subject to PSD analysis (prior actuals compared to requested allowables) for pollutants related to the production increase? We raised the question in an incompleteness letter, and I've attached the consultant's response. Please note that day 90 is September 25.

c: R. Kirby  
W. Schroeder  
W. Thomas

attach

coron898



**KOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**  
 4014 NW THIRTEENTH STREET  
 GAINESVILLE, FLORIDA 32609  
 352/377-5822 • FAX/377-7158

RECEIVED June 23, 1998

JUN 29 1998

D E P

Mr. William Schroeder  
 Air Permitting Engineer  
 FDEP Southwest District  
 3804 Coconut Palm Drive  
 Tampa, Florida 33619

**SUBJECT:** Coronet Industries, Inc.  
 Hillsborough County – Air Permit  
 DEP File No. 0570075-009

Post-it® Fax Note 7671		Date 7/30	# of pages 3
To NOEL M.	From BILL S.		
Co./Dept. EPC	Co. FDEP		
Phone #	Phone #		
Fax #	Fax #		

Dear Mr. Schroeder:

This letter shall provide the additional information requested in your letter dated May 21, 1998. All questions have been reproduced, preserving your numbering. Responses follow each question.

- Information from past Annual Operating Reports, supplied by Hillsborough County EPC, show that the increases requested for sulfur dioxide, particulate matter, and fluorine emissions exceed the amounts required for PSD analysis. Please address this issue.**

**Response**

The emissions increases resulting from the increase in feed rate (from 18.0 tons/hour to 24.3 tons/hour) were evaluated prior to the issuance of permit No. 0570075-006-AC. The increase in production rate was not subject to PSD review, because there were no federally enforceable limitations on production rate.

The current request to amend permit No. 0570075-006-AC requests only a slight increase in permitted heat input – no changes to production rate are requested. The current application represents a minor modification to a major source – therefore PSD review is not applicable.

Prior “actual” emissions are set equal to “allowable” emissions under permit No. 0570075-006-AC. This is because the plant has not operated at the rate authorized by permit No. 0570075-006-AC, and there is no representative emissions data for this production rate. The

emissions increases will be only those increases resulting from the increased fuel use. The current request involves no increase in the permitted emission rates for particulate matter and fluoride emissions, with respect to permit No. 0570075-006-AC. Therefore, only sulfur dioxide increases resulting from the requested increase in fuel use are to be considered. Also, the sulfur content of natural gas is generally considered insignificant, so the sulfur dioxide emissions are only considered with respect to the use of No. 2 fuel oil.

Permit No. 0570075-006-AC	Requested by Applicant, 0570075-009
Heat Input = 110.91 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10 <sup>3</sup> gal. Gallons/yr = 110.91 * 8760/141 = 6891 x 10 <sup>3</sup>	Heat Input = 128.0 MMBtu/hr Hours = 8760 hrs/yr Fuel Heat Content = 141 MMBtu/10 <sup>3</sup> gal. Gallons/yr = (Synthetic Limit) = 7591 x 10 <sup>3</sup>
Increase in fuel use (gal/yr) = 7591 x 10 <sup>3</sup> - 6891 x 10 <sup>3</sup> = 700 x 10 <sup>3</sup>	
SO <sub>2</sub> Emission Factor = 142(%S) lbs/10 <sup>3</sup> gal, at 0.5% S = 71 lbs/10 <sup>3</sup> gal	
Increase in SO <sub>2</sub> Emission Rate = 71 lbs/10 <sup>3</sup> gal x 700 x 1.0 ton/2000 lbs = 25 TPY	

It is important to note that the annual fuel oil use has been synthetically limited to reduce permitting fees – not to avoid PSD review. The requested heat input level without the synthetic limitation would still result in a less than significant increase in SO<sub>2</sub> emissions.

The emissions increase for sulfur dioxide would be only that resulting from the requested increase in fuel oil use. This increase would be less than the PSD significant emission rate.

Please contact me if further information is required.

Sincerely,



Steven C. Cullen, P.E.  
 Koogler & Associates

copy to: Frank Sweat – Coronet Industries