

CORONET INDUSTRIES, INC.

RECEIVED

MAY 10 2002

May 6, 2002

Re: FDEP letter dtd. April 5, 2002
Notification of categorical source of hazardous air pollutants

BUREAU OF AIR REGULATION

Dear Ms. Phillips:

In accordance with the letter referenced above, please note that Coronet Industries, Inc. is in the affected category of **Industrial, Commercial & Institutional Boilers and Indirect-fired Process Heaters**. As such, the following information is provided:

- (1) Facility Name: Coronet Industries, Inc.
Facility I.D. No.: 0570075
P.O. Box 760
4082 Coronet Road
Plant City, FL 33564

Facility Description: Coronet Industries, Inc. is an animal feed defluorination facility. A proprietary mixture of phosphate rock, phosphoric acid, and soda ash is defluorinated in kilns and reactors before use as an animal feed supplement. The final product is called "CDP", (Coronet Defluorinated Product).

Fluorine compounds are recovered from Kiln and reactor exhaust gases, and are used to produce various fluoride salts (potassium fluoborate [KBF₄] and others) in two fluoride salts plants.

- (2.) Relevant industry type source category: Industrial, Commercial & Institutional Boilers and Indirect-fired Process Heaters
- (3.) Relevant emission units:

EU019: 200 HP Kewanee Boiler for Defluorinating Plant
EU020: 100 HP Kewanee Boiler for Defluorinating Plant
- (4.) To date, Coronet Industries, Inc. is not aware of any affected sources for which a 112(g) MACT determination has been made.

For additional information, please contact our Environmental Department at 813-719-7229.

Sincerely,
Coronet Industries, Inc.


Jim Baker, P.E.
Environmental Manager


Mike Nagashima
Chief Operating Officer
Responsible Officer



Department of Environmental Protection

Jeb Bush
Governor

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

April 5, 2002

To the Title V Air Permitting Contact Person:

Our records indicate that your facility may be a major source of hazardous air pollutants and may be in the affected **Industrial, Commercial & Institutional Boilers and Indirect-fired Process Heaters** source category. Therefore, **you must notify us by May 15, 2002 if you think** your facility is a major source of hazardous air pollutants and is in an affected industry type source category. A list of affected industry type source categories is printed on the reverse side of this letter.

The Clean Air Act (CAA), as amended in 1990, requires that the USEPA publish federal regulations by May 15, 2002 to determine the maximum achievable control technology (MACT) to reduce emissions of hazardous air pollutants (HAPs) from certain industry type source categories at facilities that emit major amounts of hazardous air pollutants. A major amount of hazardous air pollutants is considered to be 10 tons per year or more of a single hazardous air pollutant, or 25 tons per year or more of a combination of hazardous air pollutants. However, the USEPA is not likely to publish the federal MACT regulations until May 15, 2004 instead of May 15, 2002, the MACT "hammer" date. As a result, Section 112(j) of the Clean Air Act must be initiated.

If you think your facility is a major source of hazardous air pollutants and is in an affected industry type source category, you must submit to our office and the USEPA by **May 15, 2002** the following **112(j) notification information**, which may be in letter format:

- (1) The name, address (physical location), and brief description of the major source (facility);
- (2) An identification of the relevant industry type source category(ies) [See list on reverse side of this letter.];
- (3) A list of the emission units belonging to the relevant industry type source category(ies); and
- (4) An identification of any affected sources for which a section 112(g) MACT determination has been made.

This submittal must be signed by the Title V permit Responsible Official. The mailing addresses for the 112(j) contacts at our office and the USEPA are:


Ms. Cindy Phillips, P.E.
FDEP Bureau of Air Regulation
MS 5505
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Mr. Doug Neeley
Air, Pesticides, and Toxics Management Division
USEPA Region IV
61 Forsyth Street, SW
Atlanta, GA 30303-8960

This notification requirement does not affect the processing of any Title V permits that are undergoing renewal now or in the near future. Any newly applicable NESHAP requirements that may be promulgated by May 2004 will be incorporated into your Title V permit through the procedures specified in 40 CFR 70.7 (f), *Reopening for cause*. As before, any new construction or reconstruction that, by itself, will emit a major amount of hazardous air pollutants, will likely require a 112(g) Case-by-case MACT determination during the construction permitting process.

If you have any questions, please contact Ms. Cindy Phillips at 850-921-9534 or Cindy.Phillips@dep.state.fl.us.

Sincerely,


Scott M. Sheplak, P.E. Administrator
Title V Section, Bureau of Air Regulation

"More Protection, Less Process"



Florida Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David Struhs
Secretary

F A X T R A N S M I T T A L S H E E T

DATE: 5/6/02

TO: _____

PHONE: _____

FAX: 813-754-8558

FROM: Cindy Phillip
Division of Air Resources Management

PHONE: 921-9534

FAX: 850.922.6979

RE: _____

CC: _____

Total number of pages including cover sheet: 5

Message

If there are any problems with this fax transmittal, please call the above phone number.

"Protect, Conserve, and Manage Florida's Environmental and Natural Resources"

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THE UPCOMING INDUSTRIAL BOILER & PROCESS HEATER MACT STANDARDS

Air Toxics Implementation Workshop
April 9, 2002
Cary, North Carolina

Presentation Outline

- Summarize the status of the Industrial Boiler and Process Heater MACT rulemaking

Status of Industrial Boiler MACT

- Source categories included:
 - Industrial Boilers
 - Institutional/Commercial Boilers
 - Process Heaters
- Major source MACT only
- Subcategorizing by fuel type, size, and use

Industrial Boilers plus Process Heaters ?

- Boilers and "indirect-fired" process heaters are similar combustion devices
 - Combust similar fuels to heat water (steam) or other materials
 - Both transfer heat indirectly
 - Fuel-related emissions are the same
 - Organic HAPs are similar

Potential Affected Major Sources

- Total: 57,000 units (42,000 boilers, 15,000 process heaters)
 - 2,500 coal-fired units
 - 46,800 gas-fired units
 - 700 wood-fired units
 - 6,000 oil-fired units
 - 1,200 mixed fuel-fired units
- Based on size or colocation

Emission Controls

- Various controls and combination are used
- Metals and particulate matter
 - Fabric filters, ESP, scrubbers
- Acid gases (HCl)
 - Scrubbers (Wet and Dry)
- Mercury
 - Fabric filters
- Organic HAPs (Dioxins, Formaldehyde)
 - CO monitoring and limit

Databases

- Inventory database (fossil fuel)
- Survey database (nonfossil fuel)
- Emission database
- Can be downloaded from EPA's website at:
 - <http://www.epa.gov/ttn/atw/combust/iccrarch/iccrarch.html>
 - Microsoft ACCESS is the database software

What units will the MACT cover?

- All industrial boilers located at major sources
- All commercial and institutional boilers located at major sources
- All process heaters located at major sources

What units will the MACT not cover?

- Fossil fuel-fired electric utility boilers
- Boilers burning municipal waste
- Boilers burning hazardous waste
- Boilers burning medical waste
- Black liquor recovery boilers
- Hot water heaters
- Waste heat boilers

Preliminary Baseline Emissions

- HCl = 66,000 tpy
- Lead = 175 tpy
- Chromium = 200 tpy
- PAH = 580 tpy
- Formaldehyde = 3,850 tpy
- Mercury = 14 tpy
- Particulate Matter = 1,000,000 tpy

Preliminary Subcategories

- Three main subcategories selected based on fuel type:
 - Solid fuel-fired units
 - Liquid fuel-fired units
 - Gaseous fuel-fired units
- Additional subcategories to analyze impacts on small businesses
 - Subcategories based on size
 - Greater than 10 million Btu/hr heat input
 - Less than 10 million Btu/hr heat input
 - Subcategories based on use
 - Limited-use (less than 10% capacity factor)
- Total of 9 subcategories

MACT Floor Results

- Preliminary MACT floors based on control technologies for existing sources
 - For solid fuel boilers
 - Large units - Baghouse (metals)/scrubber (HCl)
 - Small units - No Floor
 - Limited-use Units - ESP
 - For liquid fuel units - No Floor
 - For gaseous fuel units - No Floor
- MACT floors are actually emissions levels

MACT Floor - New Units

- Based on control technologies, state regulations, and new source performance standard (NSPS)
- Solid and Liquid fuel units
 - Large units -- Baghouse/scrubber/CO limit
 - Small units -- Baghouse/scrubber
 - Limited-use Units -- Baghouse/scrubber/CO limit
- Gaseous fuel units
 - Large/limited use units -- CO limit
 - Small units -- No Floor
- MACT floors are actually emissions levels

Preliminary MACT Floor Levels

- Based on review of emission database
- Existing large solid fuel-fired units
 - PM -- about 0.07 lb/million Btu
 - HCl -- about 0.09 lb/million Btu (90 ppm)
 - Hg -- about 4 lb/trillion Btu
- New large solid fuel-fired units
 - PM -- about 0.01 lb/million Btu
 - HCl -- about 0.02 lb/million Btu (20 ppm)
 - CO -- 200 ppm @ 3% oxygen
 - Hg -- about 1 lb/trillion Btu

Preliminary MACT Floor Findings

- Estimated annual costs to meet existing MACT floor emission levels
 - 30 million Btu/hr wood unit/cyclone - \$100K (ESP)
 - 180 million Btu/hr wood unit/cyclone - \$300K (scrubber)
 - 54 million Btu/hr coal unit/cyclone - \$250K (venturi)
 - 600 million Btu/hr coal unit/baghouse - \$500K (scrubber)

Beyond the Floor Control Options

- For solid fuel boilers -- fuel switching (Hg)/GCP
- For liquid fuel boilers -- ESP (metals)/GCP
- For gaseous fuel boilers -- GCP

Provisions Being Considered

- Alternate metal standard
 - minimize impacts on small businesses
 - sensitive to sources burning fuel with little metals, but emitting PM to require control
 - sum of 8 selected metals: arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium
 - will be based on review of emission database

Schedule

- Proposal in Summer 2002

INFORMATION AND CONTACT

- Information on the MACT rulemaking for industrial, commercial, and institutional boilers and process heaters is available on EPA's web site at:
 - www.epa.gov/ttn/atw/combust/boiler/boilerpg.html
- Contact: Jim Eddinger
919-541-5426
eddingcr.jim@epa.gov