



Lawton Chiles
Governor

Florida Department of Environmental Protection

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

Virginia B. Wetherell
Secretary

July 23, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Edwin L. Peters
General Manager
Timber Energy Resources, Inc.
Post Office Box 199
Telogia, Florida 32360

Dear Mr. Peters:

Re: Letter Amendment to the Operation Permit, No. AO 39-205360, to Authorize Timber Energy Resources, Inc., to Conduct Pollutant Emissions Performance Tests While Firing a Combination of Wood/Wood Waste and ITT Rayonier's Clarifier Residue in Timber Energy Resources, Inc.'s No. 1 Boiler

The Department has reviewed the request received February 10, 1993, submitted by Mr. Jerome J. Guidry on behalf of Timber Energy Resources, Inc. (TERI); and, supplemental information received March 22 and May 10, 1993, submitted by Dr. Thomas A. Herbert and Mr. Jerome J. Guidry, respectively. We have also considered the Department's legal authority to allow TERI to conduct performance tests for pollutant emissions while firing wood/wood waste with ITT Rayonier's clarifier residue (residue) in the facility's No. 1 boiler. Paragraph 403.061(15), Florida Statutes (F.S.) authorizes the Department to consult with any person proposing to construct, install, or otherwise acquire a pollution control device or system concerning the efficacy of such device or system, or the pollution problem which may be related to the source, device, or system. Paragraph 403.061(16), F.S., authorizes the Department to encourage voluntary cooperation by persons in order to achieve the purposes of the state environmental control act. Paragraph 403.061(18), F.S., authorizes the Department to encourage and conduct studies, investigations, and research relating to the causes and control of pollution. Florida Administrative Code (F.A.C.) Rule 17-210.700(5) authorizes the Department to consider variation in industrial equipment and make allowances for excess emissions that provide practical regulatory controls consistent with the public interest.

In accordance with the provisions of Paragraphs 403.061(15), (16), and (18), F.S., and F.A.C. Rule 17-210.700(5), you are hereby authorized to conduct performance tests for pollutant emissions on the facility's No. 1 boiler while firing 1) 100% wood/wood waste and 2) wood/wood waste-residue combination. The No. 1 boiler is permitted at a maximum heat input rate of 230 MMBtu/hr (wood/wood waste input/feed rate of 23.42 tons/hr @ a heating value of ~10

Mr. Edwin L. Peters
Amendment to AO 39-205360
July 23, 1993
Page 2

MMBtu/ton). For the proposed combination fuel test, the maximum input/feed rate of the residue will be 2.5 tons/hr as received (the residue has a heating value of 2,990 Btu/lb as received and 7,790 Btu/lb dry). The No. 1 boiler's total heat input rate for each of the proposed tests shall be essentially equivalent or the test results may be deemed invalid for comparative purposes, which is the sole reason for authorizing and conducting these tests. The No. 1 boiler was permitted under the construction permit, No. AC 39-090091, and is not permitted to fire the residue in accordance with the referenced permit.

Screening for a modification and Prevention of Significant Deterioration (PSD) shall be in accordance with Chapter 403, F.S.; F.A.C. Chapters 17-210 thru 17-297, and 17-4; and, Title 40 Code of Federal Regulations (CFR; July, 1992 version), which will compare the actual pollutant emissions of the baseline tests (100% wood/wood waste) to the actual pollutant emissions of the performance tests while firing a wood/wood waste-residue combination. The performance test results will be evaluated by the Department's Bureau of Air Regulation (BAR) and Northwest District and other potentially affected parties (i.e., U.S. EPA, National Park Service, etc.).

The performance tests shall be subject to the following conditions:

1. The permittee shall notify, in writing, the Department's Northwest District and Bureau of Air Regulation (BAR) offices at least 15 days prior to commencement of the performance tests. A written report shall be submitted to these offices within 45 days upon completion of the last test run.
2. The results from the baseline pollutant emissions tests (100% wood/wood waste) shall be compared to the wood/wood waste-residue combination pollutant emission tests to determine if:
 - a) PSD or non-PSD emissions review is required where actual emissions increased (baseline versus wood/wood waste-residue combination), which includes a construction permit application and the appropriate processing fee; or,
 - b) the construction permit, No. AC 39-090091, can be amended to allow the firing of a wood/wood waste-residue combination in the facility's No. 1 boiler on a continuous basis.
3. All pollutant emissions results shall be compared to "actual emissions" for PSD review purposes (see Region IV, U.S. EPA's letter dated April 4, 1990).

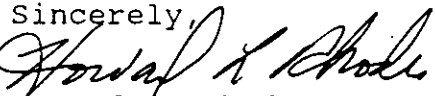
Mr. Edwin L. Peters
Amendment to AO 39-205360
July 23, 1993
Page 3

4. The contents of Mr. Jerome J. Guidry's letter with enclosure received February 10, 1993, Dr. Thomas A. Herbert's letter with enclosures received March 11, 1993, and Mr. Jerome J. Guidry's letter received May 5, 1993 (FAX; hard copy received May 10), are adopted by reference, with the following exceptions:
 - o The time frame that will be permitted to execute the compatibility evaluations and performance tests is 14 calendar days from the first day of introducing the residue into the No. 1 boiler; and, notification shall be submitted to the Department's Northwest District of this date.
 - o If additional time is needed, the permittee shall request an extension of time and provide the Department with documentation of the progress accomplished to date and shall identify what is left to be done to complete the performance tests.
 - o Accountability of the No. 1 boiler's operations (i.e., steam generation and total Btu heat input) during the performance tests shall be required.
 - o A Type I audit is required and shall be coordinated with the Department's Northwest District office. The "Compliance Verification Audit Handbook", dated March, 1982, will be used as a guidance for performing the audit.
 - o Documentation of the actual firing rates, by weight, of each and separate fuel stream 1) 100% wood/wood waste and 2) wood/wood waste-residue combination shall be required.
 - o The Department will take the responsibility of providing a cover letter to and mailing the performance test results to the reviewing parties (i.e., Department's Northwest District, U.S. EPA, National Park Service, etc.).
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5. These authorized performance tests shall not result in the release of objectionable odors pursuant to F.A.C. Rule 17-296.320(2).
6. Performance testing shall immediately cease upon the occurrence of a valid environmental complaint by a citizen or other party, or a nuisance or danger to public health or welfare. Performance testing shall not resume until appropriate measures to correct the problem have been implemented.
7. The performance tests for pollutant emissions shall be conducted under the direct supervision and responsible charge of a professional engineer registered in Florida.

Mr. Edwin L. Peters
Amendment to AO 39-205360
July 23, 1993
Page 4

8. This Department action is just to authorize the performance tests for pollutant emissions on the facility's No. 1 boiler while firing a wood/wood waste-residue combination. Any firing of the residue after the last performance test run is completed will be deemed a violation of the past construction permit, No. AC 39-090091, and operation permit, No. AO 39-205360.
9. Complete documentation (recording) of any firing of the residue in the facility's No. 1 boiler shall be required (i.e., testing results; materials utilized, by weight; etc.) and kept on file for a minimum of two years.
10. The Department' BAR and Northwest District shall be notified in writing on the date of the last test run completion.
11. The performance tests shall be conducted while the No. 1 boiler is operating at 90-100% of the permitted capacity.
12. Operation Permit, No. AO 39-205360, and all related material are incorporated by reference. This authorization to conduct performance tests does not permit the violation of any permit condition or Department regulations.
13. Samples of the scrubber medium shall be taken before and after each performance test. The samples shall be tested for pH, metals, and VOCs.
14. Attachments (See Attachment Section) are incorporated.

The Department has relied on the information referenced in the attachments in authorizing this permit amendment to the operation permit, No. AO 39-205360. This letter amendment and its Attachments must be attached to the air operation permit, No. AO 39-205360, and shall become a part of the permit.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/BM/rbm

Attachments

cc: E. Middleswart, NWD
J. Koogler, Ph.D., P.E., K&A
J. Braswell, Esq., DER
J. Guidry, P.E., TSI
J. Neubauer, NWDB

Attachment Section

1. Mr. Jerome J. Guidry's letter with enclosure received February 10, 1993.
2. Mr. C. H. Fancy's letter with enclosures dated March 11, 1993.
3. Dr. Thomas A. Herbert's letter with enclosures received March 22, 1993.
4. Mr. Jerome J. Guidry's letter received May 5, 1993, via FAX (hard copy received May 10, 1993).
5. 40 CFR (July, 1992 version).
6. Ms. Jewell A. Harper's letter dated April 4, 1990.
7. Compliance Verification Audit Handbook (March, 1982).
8. Intent to Issue package dated May 13, 1993.
9. Public Notice received July 14, 1993.
10. Final Determination dated July 23, 1993.

ATTACHMENT 10

Final Determination

July 23, 1993

Timber Energy Resources, Inc.

AO 39-205360 Amendment

The operation permit amendment application package has been reviewed by the Department. The Department's Intent to Issue was distributed on May 21, 1993, and available for public inspection at the Department's Northwest District office, Northwest District Branch office, and Bureau of Air Regulation office. Public Notice of the Department's Intent to Issue was published in the Tallahassee Democrat on June 5, 1993.

There were no comments received during the public notice period. Therefore, it is recommended that the operation permit amendment be issued as drafted.

Florida Department of
Environmental Protection

Memorandum

TO: Howard L. Rhodes
FROM: Clair Fancy *CHF*
DATE: July 22, 1993
SUBJ: Approval of an Operation Permit Amendment
AO 39-205360
Timber Energy Resources, Inc: No. 1 Boiler

Attached for your approval and signature is an operation permit amendment prepared by the Bureau of Air Regulation for the above referenced company to conduct a battery of pollutant emissions tests while firing a combination of 100% wood/wood waste and a combination of wood/wood waste and ITT Rayonier's clarifier residue in their No. 1 boiler. The purpose for the tests is to identify the pollutants emitted from the process and to assess the future control needs if the material is to be co-fired on a regular basis.

Timber Energy Resources, Inc.'s No. 1 boiler normally fires wood/wood waste to provide heat for steam production. If the test results are favorable, then the utilization of the clarifier residue on a regular basis will remove the need for landfilling this material in the future. The facility is located outside of Telogia, Liberty County, Florida.

The project has been evaluated for hazardous waste concerns by the Department's Hazardous Waste Section and the material, as presented in the documents supplied by the applicant/applicant's representative, was deemed to be a nonhazardous waste.

I recommend your approval and signature.

CHF/BM/rbm

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Edwin L. Peters
General Manager
Timber Energy Resources, Inc.
P. O. Box 199
Telogia, FL 32360

4a. Article Number
P 230 523 756

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

5. Signature (Addressee)

6. Signature (Agent)
K. Babu


7. Date of Delivery
8-3-93

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1991 *U.S. GPO: 1992-323-402 **DOMESTIC RETURN RECEIPT**

Thank you for using Return Receipt Service.

P 230 523 756

 **Receipt for Certified Mail**
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	
Mr. Edwin L. Peters, Timber	
Street and No	
P O Box 199 Energy Resources	
P O, State and ZIP Code	
Telogia, FL 32360	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
Mailed: 8-2-93	
Permit: A0 39-205360	

PS Form 3800, June 1991