

# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

May 21, 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: Request for Authorization 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 (AO 39-205360)

Attached is one copy of the proposed performance test authorization amendment to operation permit, No. AO 39-205360, for Timber Energy Resources, Inc. (TERI), to conduct pollutant emissions tests on the facility's No. 1 boiler. The proposed performance tests for pollutant emissions will be conducted at baseline conditions (100% wood/wood waste) and while firing a combination of wood/wood waste and ITT Rayonier's clarifier residue (residue). 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.

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 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.

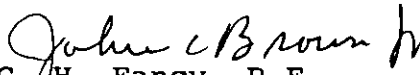
The emissions tests are being proposed in order to gather data regarding pollutant emissions while firing a combination of wood/wood waste and residue. Screening for a modification and Prevention of Significant Deterioration (PSD) will be in accordance with Chapter 403, Florida Statutes; Florida Administrative Code (F.A.C.) Chapters 17-210 thru 17-297, and 17-4; and, Title 40 Code of Federal Regulations (CFR; July, 1992 version). If, after the performance test results are evaluated by the Department's Bureau of Air Regulation and Northwest District and other potentially affected parties (i.e., U.S. EPA, National Park Service, etc.) and it is

Mr. Edwin L. Peters  
Amendment to AO 39-205360  
May 21, 1993  
Page Two

determined that actual pollutant emissions [baseline @ 100% wood/wood waste vs. wood/wood waste-residue combination] did not increase, then the Department will issue an amendment to the construction permit, No. AC 39-090091, authorizing continuous firing of a wood/wood waste-residue combination in the facility's No. 1 boiler. However, if there is an actual emissions increase in pollutant emissions, TERI will not be permitted to fire the residue in the facility's No. 1 boiler without further emissions evaluation by the Department and affected parties.

If there are any questions, please call Mr. Preston Lewis at (904)488-1344 or submit any written comments you wish to have considered concerning the Department's proposed action to me.

Sincerely,

  
C.H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/BM/rbm

Attachments

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

BEFORE THE STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of  
Application/Request for Permit Amendment by:

Timber Energy Resources, Inc.  
P. O. Box 199  
Telogia, Florida 32360

DER File No. AO 39-205360

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INTENT TO ISSUE

The Department of Environmental Regulation (Department) hereby gives notice of its intent to issue to Timber Energy Resources, Inc. (TERI), an amendment to the operation permit, No. AO 39-205360, authorizing performance tests for pollutant emissions while firing wood/wood waste with ITT Rayonier's clarifier residue (residue) in the facility's No. 1 boiler, as detailed in the application/request package specified above. The Department is issuing this Intent to Issue for the reasons stated below and in the attached proposed amendment.

The applicant, TERI, submitted a request on February 10, 1993, to the Department's Bureau of Air Regulation (BAR) for authorization to conduct pollutant emissions tests on the facility's No. 1 boiler while firing a wood/wood waste-residue combination. The performance tests for pollutant emissions will be conducted at baseline conditions (100% wood/wood waste) and while firing a combination of wood/wood waste and residue.

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 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) will be in accordance with Chapter 403, Florida Statutes (F.S.); Florida Administrative Code (F.A.C.) Chapters 17-210 thru 17-297, and 17-4; and, Title 40 Code of Federal Regulations (CFR; July, 1992 version). If, after the performance test results are evaluated by the Department's BAR and Northwest District and other potentially affected parties (i.e., U.S. EPA, National Park Service, etc.) and it is determined that actual

pollutant emissions [baseline @ 100% wood/wood waste vs. wood/wood waste-residue combination] did not increase, then an amendment to the construction permit, No. AC 39-090091, will be issued with certain Specific Conditions authorizing continuous firing of a wood/wood waste-residue combination in the facility's No. 1 boiler. However, if there is an actual emissions increase in pollutant emissions, TERI will not be permitted to fire the residue in the facility's No. 1 boiler without further emissions evaluation by the Department and affected parties.

The proposed project will occur at the applicant's facility located off State Road 65 south of Telogia, Liberty County, Florida.

The Department has permitting jurisdiction under Chapter 403, F.S.; F.A.C. Chapters 17-210 thru 17-297, and 17-4; and, 40 CFR (July, 1992 version). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed activity.

Pursuant to Section 403.815, F.S., and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue a Permit Amendment. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be the one with significant circulation in the area that may be affected by the permitting action. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 (904-488-1344), within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the amendment.

The Department will issue the permit amendment with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition

within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

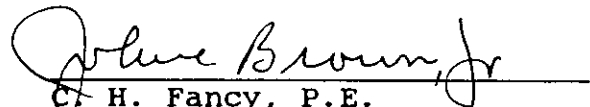
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

Copies furnished to:

E. Middleswart, NWD

J. Koogler, Ph.D., P.E., K&A

J. Braswell, Esq., DER

J. Guidry, P.E., TSI

J. Neubauer, NWDB

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on May 21, 1993.

FILING AND ACKNOWLEDGMENT  
FILED, on this date, pursuant to  
§120.52(9), Florida Statute, with  
the designated Department Clerk,  
receipt of which is hereby  
acknowledged.

Charlotte J. Hayes 5/21/93  
Clerk Date

State of Florida  
Department of Environmental Regulation  
Notice of Intent to Issue

Timber Energy Resources, Inc.

Amendment to AO 39-205360

The Department of Environmental Regulation (Department) hereby gives notice of its intent to issue to Timber Energy Resources, Inc. (TERI), an amendment to the operation permit, No. AO 39-205360, authorizing performance tests for pollutant emissions while firing wood/wood waste with ITT Rayonier's clarifier residue (residue) in the facility's No. 1 boiler, as detailed in the application/request package. The Department is issuing this Intent to Issue for the reasons stated below and in the proposed amendment.

The applicant, TERI, Post Office Box 199, Telogia, Florida 32360, submitted a request on February 10, 1993, to the Department's Bureau of Air Regulation (BAR) for authorization to conduct pollutant emissions tests on the facility's No. 1 boiler. The performance tests for pollutant emissions will be conducted at baseline conditions (100% wood/wood waste) and while firing a combination of wood/wood waste and residue.

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 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) will be in accordance with Chapter 403, Florida Statutes (F.S.); Florida Administrative Code (F.A.C.) Chapters 17-210 thru 17-297, and 17-4; and, Title 40 Code of Federal Regulations (CFR; July, 1992 version).

If, after the performance test results are evaluated by the Department's BAR and Northwest District and other potentially affected parties (i.e., U.S. EPA, National Park Service, etc.) and it is determined that actual pollutant emissions [baseline @ 100% wood/wood waste vs. wood/wood waste-residue combination] did not increase, then an amendment to the construction permit, No. AC 39-090091, will be issued with certain Specific Conditions authorizing continuous firing of a wood/wood waste-residue combination in the

facility's No. 1 boiler. However, if there is an actual emissions increase in pollutant emissions, TERI will not be permitted to fire the residue in the facility's No. 1 boiler without further emissions evaluation by the Department and affected parties.

The proposed project will occur at the applicant's facility located off State Road 65 south of Telogia, Liberty County, Florida.

The Department has permitting jurisdiction under Chapter 403, F.S.; F.A.C. Chapters 17-210 thru 17-297, and 17-4; and, 40 CFR (July, 1992 version). The project is not exempt from permitting procedures. The Department has determined that a permit amendment is required for the proposed activity.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

The Petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be



filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The amendment request/application package is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation  
Bureau of Air Regulation Office  
Magnolia Park Courtyard  
111 South Magnolia Drive  
Tallahassee, Florida

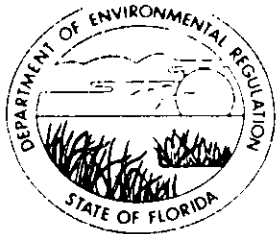
Department of Environmental Regulation  
Northwest District Office  
160 Governmental Center  
Pensacola, Florida 32501-5794

Department of Environmental Regulation  
Northwest District Branch Office  
2815 Remington Green Circle  
Tallahassee, Florida 32308

Any person may send written comments on the proposed action to Mr. Preston Lewis at the Department's Tallahassee address. All comments received within 14 days of the publication of this notice will be considered in the Department's final action.

### 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 Month Day, 1993.
10. Final Determination dated Month Day, 1993.



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# Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

June xx, 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

DRAFT

Mr. Edwin L. Peters  
Amendment to AO 39-205360  
June xx, 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).

# DRAFT

Mr. Edwin L. Peters  
Amendment to AO 39-205360  
June xx, 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.).
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.

# DRAFT

Mr. Edwin L. Peters  
Amendment to AO 39-205360  
June xx, 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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.  
ATLANTA, GEORGIA 30365

APR 4 1990

4APT-AEB

Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental  
Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

~~RECEIVED~~

APR 09 1990

DER-BAQM

RE: Florida Crushed Stone (PSD-FL-091)

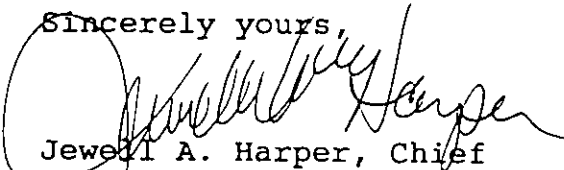
Dear Mr. Fancy:

This is to acknowledge receipt of your letter dated March 15, 1990, transmitting a request by Florida Crushed Stone to amend their prevention of significant deterioration (PSD) permit to allow the burning of tire derived fuel (TDF) in their cement kiln. The current permit for the source limits the fuel of the kiln to coal only. As discussed between Mr. Bruce Mitchell of your staff and Mr. Gregg Worley of my staff on March 30, 1990, we have the following comments.

Under the scenario presented by the source, the switch to the use of TDF in the kiln would not constitute a major modification for the purposes of PSD provided that the increase in pollutants due to the fuel switch did not exceed significant emissions increase levels. It is important to note that the change in emissions must be evaluated from "old actual" to "new allowable" emissions. The old actual emissions must be based on the previous two years of operating data unless some other period is deemed to be more representative of normal operating conditions. The new allowable emissions will be those emissions which are reflected in the amended permit. Also, it was noted that the list of pollutants to be tested did not include benzene. Since benzene is a pollutant regulated under the Clean Air Act for which a significant emissions rate has not been established, any increase of emissions of benzene would subject the source to PSD.

Thank you for the opportunity to review and comment on this package. If you have any further questions or comments, please do not hesitate to contact Mr. Gregg Worley of my staff at 404/347-2864.

Sincerely yours,

  
Jewell A. Harper, Chief  
Air Enforcement Branch  
Air, Pesticides and Toxics  
Management Division

copied via CHF request


BAR copy sent 2/24/91

Is your RETURN ADDRESS completed on the reverse side?

<b>SENDER:</b> • 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): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> 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 230 524 304	
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
		7. Date of Delivery 5-21-93	
5. Signature (Addressee) Y		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent) Kathleen Bailey			

Thank you for using Return Receipt Service.

P. 230 524 304



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

To: Mr. Edwin L. Peters, Timber	
Street and No. Energy Resources	
P. O. Box 199	
P.O., State and Zip Code: Telogia, FL 32360	
Postage	\$
Certification 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: 5-21-93	
Permit: A039-205360	

PS Form 3800, June 1991