



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 527-92-04

March 14, 1994

RECEIVED

MAR 16 1994

Bureau of
Air Regulation

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to
File a Petition
Piney Point Phosphates, Inc.

Dear Mr. Congden:

Attached is a request for an extension of time to file for a hearing in accordance with Rule 17-103.070, FAC.

If you have any questions concerning this request, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES


John B. Koogler, Ph.D., P.E.

JBK:par
Enc.

c: Ms. Patty Adams, FDEP
Mr. Ivan Nance, PPP
Ms. Sue Bidwell, PPP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

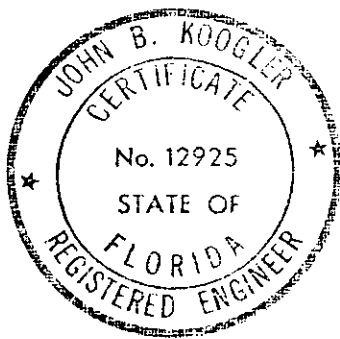
DEP File No. AC41-232096
Manatee County - AP

MOTION FOR EXTENSION OF TIME

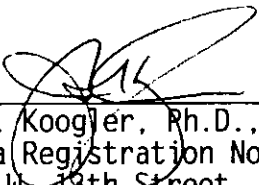
The Applicant, Piney Point Phosphates, Inc., by and through its undersigned Engineer of Record and pursuant to Rule 17-103.070, FAC, requests the Secretary of DEP to grant a 60-day extension of time in which to file a petition. The additional time will allow Piney Point Phosphates to evaluate DEP comments and submit additional information on the boiler permit application review.

Ms. Patty Adams, Projects Coordinator, DEP, has indicated that she has no objection to such an extension.

Dated the 14th day of March, 1994 in Gainesville, Alachua County, Florida.



Koogler & Associates
Environmental Services

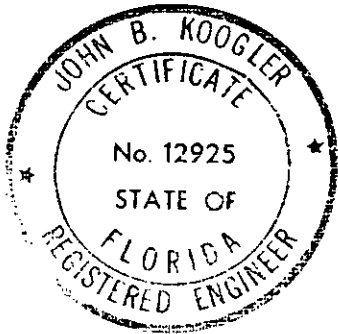


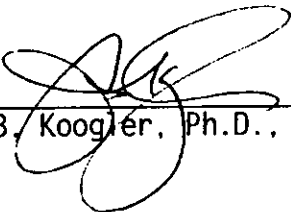
John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
Piney Point Phosphates, Inc.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, OGC, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Ms. Patty Adams, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Ivan Nance, Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 by FAX and U.S. Mail, this 14th day of March 1994.





John B. Koogler, Ph.D., P.E.





KOGGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

PROJECT 527-92-04

FAX TRANSMITTAL FORM

TO: William Congden

Cathy Adams

Ivan Vance

Sue Redwell

FROM: John Kogler

SENT BY: Nerdy

DATE: 3/14/04

FAX PHONE: 904-377-7158 VOICE PHONE: 904-377-5822

The text being transmitted consists of 3 pages PLUS this one.

REMARKS: _____



United States Department of the Interior

FISH AND WILDLIFE SERVICE
1875 Century Boulevard
Atlanta, Georgia 30345

IN REPLY REFER TO:

January 20, 1994

RECEIVED

JAN 25 1994

Bureau of
Air Regulation

Mr. Clair H. Fancy
Chief, Bureau of Air Regulation
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration Application, Preliminary Determination, and Technical Evaluation for Piney Point Phosphates (PPP). PPP proposes to modify the construction permit for a 190 MMBtu process steam boiler by increasing the hours of operation from 876 to 8,760 hours/yr. The boiler is located at a facility approximately 109 km south of the Chassahowitzka Wilderness Area (WA), a Class I air quality area administered by the Fish and Wildlife Service. The project would result in significant increases in emissions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x). Emissions of particulate matter (PM) would increase slightly.

Best Available Control Technology Analysis

PPP proposes to use No. 2 fuel oil with a maximum sulfur content of 0.05 percent to minimize SO₂ emissions. We agree that this low sulfur fuel represents SO₂ best available control technology (BACT) for this project.

The FDER has determined that 0.15 lb/MMBtu represents BACT for NO_x emissions. We agree that BACT should be at least 0.15 lb/MMBtu. Wisconsin required boilers at Consolidated Paper and Appleton Paper Companies to meet a limit of 0.05 lb/MMBtu (0.095 at low loads). In addition, they are currently reviewing a Consolidated Paper application in which 0.05 lb/MMBtu will be required at all times due to the availability of better burners. This lower NO_x limit may be feasible for the PPP boiler. We suggest that FDER consult with the state of Wisconsin.

Air Quality Modeling Analysis

The Class I air quality analysis contained in FDER's preliminary determination for the proposed 190 Mmbtu/hour boiler was not performed correctly. FDER's modeling analysis assumed offsetting

emissions and impacts from a proposed 135 Mmbtu/hour boiler which was never built. This type of "paper offset" is not acceptable. Therefore, we performed the Class I impact analysis for the proposed boiler.

We modeled impacts from the proposed 190 Mmbtu/hour boiler with the EPA Industrial Source Complex Short Term (ISCST) model using National Weather Service data (1982-86) from Tampa, Florida, and FDER's proposed SO₂, NO_x, and PM emission rates. Concentrations of SO₂, NO₂, and PM were calculated at 13 discrete receptors at Chassahowitzka WA. The modeling analysis indicates that the proposed boiler will not significantly impact the wilderness area for the short term Class I SO₂ and PM increments; nor the SO₂, NO₂, and PM annual increments.

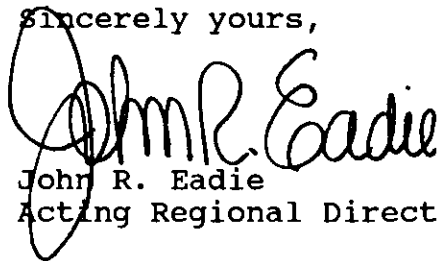
The visibility analysis performed with the EPA VISCREEN model indicates that there should be no impact of a coherent visible plume from the project at Chassahowitzka WA.

Air Quality Related Values Analysis

PPP incorrectly applied Class I significant impact levels. PPP concluded that there would be no adverse impacts to air quality related values (AQRVs) at Chassahowitzka WA, because the project's predicted impacts are less than the recommended Class I significant impact levels. In a phone conversation several months ago with Mr. Cleve Holladay of your office, we emphasized that it is the Federal Land Manager's responsibility to make this determination. We advised Mr. Holladay that because of the relatively low impacts from the project and the distance to the wilderness area, a more extensive AQRV analysis would not be required of PPP. However, we ask that FDER require future applicants to consider cumulative impacts to AQRVs even if a proposed project is not predicted to exceed Class I significant impact levels.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at 303/969-2071.

Sincerely yours,



John R. Eadie
Acting Regional Director

cc: C. Logan
C. Holladay
B. Thomas, SW Dist
R. Baum, Mamatee Co.
G. Harper, EPA
J. Koogler, KVA

*Patty
copy & file*



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ENVIRONMENTAL SERVICES
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GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 527-92-04

January 18, 1994

RECEIVED

JAN 19 1994

Bureau of
Air Regulation

Mr. Preston Lewis
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Comments on FDEP's Intent to Issue and
Submittal of Additional Information
Piney Point Phosphates, Inc.
Boiler Permit Application
Permit File Nos. AC41-232096, PSD-FL-205

Dear Mr. Lewis:

The following comments and additional information are in response to the FDEP's Technical Evaluation and Preliminary Determination for the above Piney Point Phosphates, Inc. (PPP) project.

GENERAL

1. General Comment:

The correct name of the company is Piney Point Phosphates, Inc.

NOTICE OF INTENT TO ISSUE PERMIT

2. 1st Paragraph, Line 8:

As the proposed project is expected to consume approximately 0.3% of the allowable Class I PSD NOx increment and 10% of the allowable Class II PSD NOx increment, it may be necessary to reword the Notice for the sake of accuracy.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

3. Page 2, Sec. I.B., Line 9:

The sulfuric acid plant is the primary source of steam at the plant. The proposed boiler will serve as a back-up steam supply during periods of sulfuric acid plant start-up and shutdown.

4. Page 2, Sec. II, Paragraph 1, Line 3:

As a result of the proposed project, the allowable fuel consumption will increase from 684 gallons per hour (for the existing boiler) to 1349 gallons per hour (for the proposed boiler), an increase of 665 gallons per hour.

5. Page 3, Paragraph 1, Line 3:

The proposed boiler will not be utilized as the primary source of steam at the facility (see Comment No. 3).

6. Page 3, Paragraph 2, Net Emission Table:

The significant emission rate for NO_x is 40 tons per year, in accordance with Table 212.400-2, Florida Administrative Code (FAC).

7. Page 3, Paragraph 2, Allowable Emission Table:

The allowable NO_x emissions (lbs/hr, tons/yr) in this condition are not in agreement with the emission limitation of 0.2 pounds/MMBtu, stated in the "DEP BACT Determination" on page 2 of the BACT determination document. PPP is in agreement with the "DEP BACT Determination" on page 2. The corresponding maximum allowable NO_x emission rates should read 38 lbs/hr and 166.4 tpy.

DRAFT PERMIT

8. Page 1, Paragraph 2, Line 6:

The sentence should be reworded to reflect that the boiler may be operated for upto 8760 hours per year.

9. Page 5, Specific Condition (S.C.) No. 2, Line 8:

A typographical error needs to be corrected to reflect the use of a fuel which is defined in 40CFR60.41b as a very low sulfur oil.

10. Page 5, S.C. No. 2, Line 9:

It is not clear what the Department is requiring in terms of engineering plans for the proposed project. Based on FDEP requirements for package boilers in the past, it is anticipated that a manufacturer's brochure on the boiler will suffice.



11. Page 6, S.C. No. 6, Line 4:

A typographical error needs to be corrected to reflect a rule requirement in 40CFR60.48b(a).

12. Page 6, S.C. No. 8:

Please indicate the rule requirement or the need for this permit condition, especially the requirements for an O&M plan and monitoring of emission control equipment efficiency. As the source will comply with all the applicable NSPS requirements, it is requested that this condition be deleted.

13. Page 7, S.C. No. 13:

The NOx emission limits (lbs/hr, tons/yr) in this condition should be corrected to match the emission limitation of 0.2 pounds/MMBtu, stated in the "DEP BACT Determination" on page 2 of the BACT determination document. PPP is in agreement with the "DEP BACT Determination" on page 2. The corresponding maximum allowable NOx emission rates should read 38 lbs/hr and 166.4 tpy.

14. Page 7, S.C. No. 15, Line 11:

A typographical error needs to be corrected to reflect a rule requirement in 40CFR60.46b.

15. Page 7, S.C. No. 16, Line 8:

It is not clear why FDEP is requiring a test protocol or its submittal 90 days prior to testing. The test requirements and procedures have already been referenced by rule in the same condition. Furthermore, in past permits for similar sources FDEP has not chosen not to burden itself and the permittees with such a requirement. Therefore, it is requested that the last sentence on Page 7 be deleted.

16. Page 8, S.C. No. 16:

In accordance with NSPS requirements, the wording for the test method for sulfur dioxide should be corrected to read as follows:

"Use of fuel receipts in accordance with 40CFR60.42b(j)(2) and 40CFR60.49b(r)."



17. Page 8, S.C. No. 16:

It is also requested that the following sentence, included in many other FDEP permits, be added at the end of the S.C. to provide flexibility:

"The permittee may use either the test methods prescribed above or other methods with FDEP approval."

18. Page 8, S.C. No. 18, Line 3:

The 15-day requirement in this condition conflicts with the 30-day requirement in S.C. No. 30. It is suggested that a 30-day notification be a requirement of both S.C. No. 18 and 30.

19. Page 9, S.C. No. 24, Line 3:

As the information in parenthesis regarding the contents of the fuel analysis is inaccurate and unnecessary, it is requested that it be deleted.

20. Page 9, S.C. No. 25, Line 5:

A typographical error needs to be corrected to reflect a rule requirement in 40CFR60.49b(o).

21. Page 10, S.C. No. 30, last line:

See Comment No. 18.

22. Page 11, S.C. No. 34, Line 1:

A typographical error needs to be corrected to reflect submittals to the Southwest District Office.

BACT DETERMINATION

23. Page 2, Paragraph 1, Line 4:

A typographical error needs to be corrected to reflect that fuel oil is the fuel source.



Mr. Preston Lewis
Florida Department of
Environmental Protection

January 18, 1994
Page 5

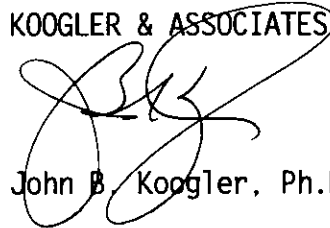
24. Pages 2 and 3:

PPP is in agreement with the "DEP BACT Determination" for NOx of 0.20 pounds/MMBtu stated on Page 2 of the BACT Determination document. However, the last sentence of the "BACT Determination Rationale" (on Page 3) refers to a NOx limitation of 0.15 lbs/MMBtu.

If there are any questions, please do not hesitate to give Pradeep Raval, or myself a call.

Very truly yours,

KOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:par

c: Ms. Susanne Bidwell
Mr. Ivan Nance

C. Logan

C. Holladay

B. Thomas, see Dist.

R. Brown, Manatee Co.

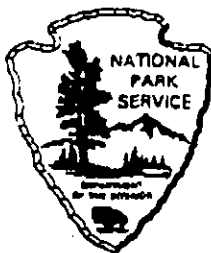
G. Harph, EPA

G. Runyak, NPS



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*FVI/VC
AL*



National Park Service

AIR QUALITY DIVISION

P.O. Box 25287 Denver, CO 80225-0287

FACSIMILE COVER SHEET

Date: 1-18-94

Telephone: (303) 969-2070

Fax: (303) 969-2822

To: Cleve Holladay
Charles Log

From: Ellen Porter

Subject: Piney Point Phosphates, Manatee County Memo and Letter

Number of pages: 3
(including this cover sheet)

Office location: Room 215, 12795 W. Alameda Parkway, Lakewood, CO 80228



United States Department of the Interior

FISH AND WILDLIFE SERVICE

WASHINGTON, D.C. 20240



ADDRESS ONLY THE DIRECTOR,
FISH AND WILDLIFE SERVICE

January 14, 1994

Memorandum

To: Regional Director, Region 4

From: Chief, Air Quality Branch

Subject: Permit Review - Piney Point Phosphates, Manatee County,
Palmetto, Florida

We have reviewed the material that the Florida Department of Environmental Regulation (FDER) forwarded to us regarding Piney Point Phosphates (PPP), Manatee County, Palmetto, Florida, located 109 km south of Chassahowitzka Wilderness Area (WA). PPP proposes to modify the construction permit for a proposed 190 MMBtu/hr process steam boiler by increasing the hours of operation from 876 to 8760 hr/yr. The increase would result in significant increases in emissions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x). Emissions of particulate matter (PM/PM₁₀) would increase slightly.

Pollutant	Pounds per Hour	Tons per Year
NO _x	28.5	124.8
SO ₂	9.6	42.0
PM/PM ₁₀	2.7	11.8

We agree that using No. 2 fuel oil with a maximum sulfur content of 0.05% represents SO₂ best available control technology (BACT) for this project. We agree that an emission rate of 0.15 lb/MMBtu represents BACT for NO_x, but suggest that lower rates may be achievable.

FDER's Class I air quality modeling analysis was not done correctly, as it assumed offsetting emissions and impacts from a proposed 135 MMBtu boiler that was never built. Therefore, we performed the analysis. The analysis predicted that emissions from the proposed boiler would result in concentrations of nitrogen dioxide (NO₂), SO₂, and PM at Chassahowitzka WA well below the recommended Class I significant impact levels.

The WISCREEN analysis indicated that there should be no impact of a coherent visible plume at Chassahowitzka WA from the project.

We remind FDER that it is incorrect to conclude that because predicted impacts are below significant impact levels, then no adverse impacts to air quality related values will occur. This determination must be made by the Federal Land Manager on a case by case basis.

In conclusion, because of the relatively low emissions, and the distance from the wilderness area, we do not anticipate that resources at Chassahowitzka WA will be adversely affected by emissions from the proposed PPP project.

We ask that you sign the attached letter and forward it to the State. If you have questions, please contact me or Ellen Porter at (303) 969-2071.

Sandra V. Silva

Sandra V. Silva

Attachment

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

Dear Mr. Fancy:

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Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ellen Porter of our Air Quality Branch in Denver at (303) 969-2071.

Sincerely,

James W. Pulliam, Jr.
Regional Director

cc: Jewell Harper, Chief
Air Enforcement Branch
Air, Pesticides and Toxic Management Division
U.S. EPA, Region 4
545 Courtland Street, NE
Atlanta, Georgia 30365

See:

FWS-REG 4: AQC

CHAS: Refuge Manager

AQP-DEN: Ellen Porter

National Park Service - AIR

P.O. Box 25287

Denver, CO 80225

I N T E R O F F I C E M E M O R A N D U M

Date: 03-Jan-1994 11:07am ES
From: Holly Burnaman TAL
BURNAMAN_H
Dept: Office General Counsel
Tel No: 904/488-9730
SUNCOM:

TO: Cleve Holladay TAL
TO: Charles Logan TAL
TO: Patty Adams TAL

(HOLLADAY_C)
(LOGAN_C)
(ADAMS_P)

CC: Duane Revell TPA

(REVELL_D @ A1 @ TPA1)

Subject: PINEY POINT PHOSPHATES INC

ON DECEMBER 27, 1993, WE RECEIVED A REQUEST FOR EXTENSION OF
TIME FROM PINEY POINT PHOSPHATES ON PERMIT NO. AC41-232096.



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 527-92-04

December 23, 1993

REC'D
DEC 28 1993

HAZARDOUS WASTE
PERMITTING

Mr. William Congden, Esq.
Office of General Counsel
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to
File a Petition
Piney Point Phosphates, Inc.

Dear Mr. Congden:

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If you have any questions concerning this request, please do not hesitate
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Very truly yours,

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John B. Koogler, Ph.D., P.E.

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c: Mr. Doug Outlaw, FDEP
Mr. Ivan Nance, PPP
Ms. Sue Bidwell, PPP

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ENGINEER
DEC 28 1993
HAZARDOUS WASTE
PERMITTING

In the Matter of an Application
for Air Permit by

Piney Point Phosphates, Inc.
13300 US Highway 41 North
Palmetto, Florida 34221-8662

DEP File No. AC41-232096
Manatee County - AP

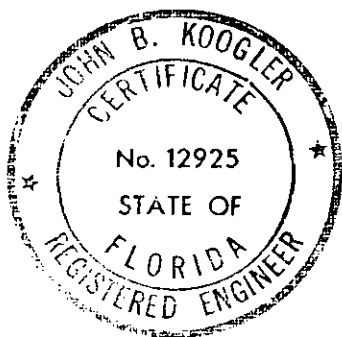
MOTION FOR EXTENSION OF TIME

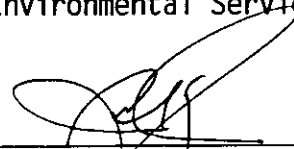
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Mr. Doug Outlaw, BACT Coordinator, DEP, has indicated that he has no objection to such an extension.

Dated the 23th day of December, 1993 in Gainesville, Alachua County, Florida.

Koogler & Associates
Environmental Services



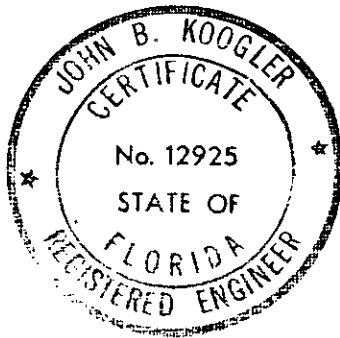


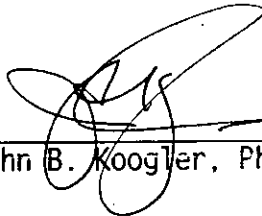
John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
Piney Point Phosphates, Inc.



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. William Congden, OGC, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Doug Outlaw, DEP, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Ivan Nance, Piney Point Phosphates, Inc., 13300 US Highway 41 North, Palmetto, Florida 34221-8662 by U.S. Mail, this 23rd day of December 1993.





John B. Koogler, Ph.D., P.E.

