



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

JUL 28 1980

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DEPT. OF
ENVIRONMENTAL REGULATION

REF: 4AH-AF

Mr. R. W. Galphin, General Manager
Container Corporation of America
North Eighth Street
Fernandina Beach, Florida 32034

Re: PSD-FL-062
Coal/Wood Waste
Power Boiler #7



Dear Mr. Galphin:

Your application for a permit to construct Power Boiler #7 is being reviewed under the Prevention of Significant Deterioration (PSD) regulations published June 19, 1978 (43 FR 26388).

Additional information is required to complete a determination of BACT for SO₂ for the proposed coal fired boiler (1021 MMBtu per hour). The analysis and data submitted was insufficient to conclude that low sulfur coal firing and an emission limit of 1.2 lbs/MMBtu represent BACT. In fact, the information submitted indicates use of a flue gas desulfurization system to achieve lower emission limits and allow the use of more plentiful higher sulfur coals is feasible. To more fully evaluate this possibility, additional analysis of the control technology options is required.

Other control technology options to be analyzed should be selected on the basis of constraints pertinent to your particular plant. However, option selection should also be consistent with the following critical parameter guidelines:

1. Coal sulfur contents ranging up to at least 4 percent by weight;
2. Minimum SO₂ removal efficiencies of 70 to 90 percent; and
3. Maximum allowable emission rates ranging from 0.6 to 1.2 pounds per million Btu.

At least two additional control options should be analyzed. The economic analysis can follow the format used in Table 4-10 of your application to show capital and total annualized cost. Additional data required for the sulfur recovery system analyzed in your application and for the new options to be analyzed are:

1. Sulfur content of coal, percent;
2. Heat content of coal, Btu per pound of coal;
3. Price of coal in dollars per ton and dollars per million Btu;
4. Control efficiency of SO₂ removal, percent;
5. Emissions of SO₂, pounds SO₂/10⁶ Btu;
6. Amount and cost of energy consumed by control system.

If you have questions, please feel free to call Mr. Kent Williams of my staff at 404/801-4552 or Mr. Jeffrey L. Shumaker of TRW, Inc. at 919/541-9100. TRW is under contract to EPA and its personnel are acting as authorized representatives of the Agency in providing aid to the Region IV PSD review program.

Sincerely,

Tommie A. Gibbs

Tommie A. Gibbs, Chief
Air Facilities Branch

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