



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

May 20, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Fiona McDonald  
Hydro Aluminum of North America  
801 International Drive, Suite 200  
Linthicum, MD 21090

Re: Melting Furnace Project – St. Augustine Facility 1090013

Dear Ms. McDonald:

The Department's Tallahassee office has been asked to co-review your application for the above project received by the Northeast District Office on May 3. The application asserts that the project is not subject to Prevention of Significant Deterioration (PSD) review since the production increase is being limited at a level below that which would trigger PSD for PM<sub>10</sub> (15 tons per year for particulate matter less than 10 microns). This conclusion is based on emission factors and assumptions that may or may not be sufficiently accurate.

For this reason, the Department requests the following additional information:

1. It is not clear that fugitive emissions have been properly accounted for in the estimates of actual and potential emissions. Please provide an estimate of fugitive emissions for all sources within the facility along with the basis for the estimates.
2. It appears that the potential fuel usage increase will be about 2.8 times the two-year past average. Please explain how this correlates with the projected production increase of 2.1 times the average actual tonnage and explain the apparent discrepancies between the 937,500 gallons for EU 008 in Table 5 vs. the 1,875,000 gal/yr indicated in Figure 2 and the usage figures shown in Table 2.
3. Please provide the basis for the 0.3 lb/ton and 0.15 lb/ton PM factors listed in Table 5 and the basis for the product throughput listed at 62,500 vs. 72,970 tons/yr (8.33 x 8760).
4. Only the first page of the Thorpe Technologies proposal was included in the application. Please provide the remaining pages.
5. In view of the discussion in the application regarding the purported non-applicability of MACT to this facility, the Bureau of Air Regulation would like to take this opportunity to reassess and reaffirm the non-applicability determination, if appropriate. Therefore, please provide copies of any correspondence with the Department related to a determination of MACT non-applicability for the St. Augustine facility.

If you have any questions, please call John Reynolds at 850/921-9530.

Sincerely,

  
James K. Pennington, P.E.  
Administrator  
North Permitting Section

cc: Khalid Al-Nahdy, DEP NED  
Kennard Kosky, P.E.

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**801 International Drive, Suite 200**  
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**Linthicum, MD, 21090**

PS Form 3800, May 2000 See Reverse for Instructions

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1. Article Addressed to:

Ms. Fiona McDonald  
 Hydro Aluminum of North America  
 801 International Drive, Suite 200  
 Linthicum, MD 21090

2. Article Number

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