

From: [Linero, Alvaro](#)
To: [Scearce, Lynn](#)
Subject: Request for Approval of NO2 Tier 3 modeling procedure
Date: Friday, December 20, 2013 9:02:07 AM
Attachments: [Tier 3 Approval Letter.PDF](#)

Lynn:

Can you post the attachment in the files for the Jax Lime project.

I don't mind if it is posted once for the attachment and again for the email.

Thanks.

Al.

From: Krivo, Stan [mailto:Krivo.Stanley@epa.gov]
Sent: Wednesday, December 11, 2013 8:49 AM
To: Krivo, Stan; Linero, Alvaro; Davis, Scott; Johnson, Brenda C.
Cc: John Shrock; Pell, Leigh; Rogers, Tom; Hazziez, Natasha
Subject: RE: Request for Approval of NO2 Tier 3 modeling procedure

Al,

Attached is the signed letter providing conditional approval of the use of the Tier 3 NO2 modeling procedure for the Jacksonville Lime PSD permit application.

Thanks for your help is resolving this issue.

...sjk

From: Krivo, Stan
Sent: Wednesday, December 11, 2013 6:47 AM
To: 'Linero, Alvaro'; Davis, Scott; Johnson, Brenda C.
Cc: John Shrock; Pell, Leigh; Rogers, Tom
Subject: RE: Request for Approval of NO2 Tier 3 modeling procedure

Al,

The letter has been prepared and is currently going through our review/signoff procedure. Our division director is the authorized person for this approval. Depending on everyone's availability and schedule, I expect the letter will complete the signoff this week.

I will let you know the progress – will fax/email a copy when complete.

Note that I have not received any additional air quality modeling report or information on this project. All the documents I have been reviewing for this project were modeling protocols. I provided review comments on Jacksonville Lime's March 2013 Supplemental Dispersion Modeling Protocol and supplemental 8 August 2013 email in August 2013. These review comments included

general (non-Tier 3) comments on the proposed modeling procedures. I have not received the resultant air quality impact assessment report/document supporting the PSD permit application for this facility.

Thanks....sjk

From: Linero, Alvaro [<mailto:Alvaro.Linero@dep.state.fl.us>]
Sent: Tuesday, December 10, 2013 2:18 PM
To: Krivo, Stan; Davis, Scott; Johnson, Brenda C.
Cc: John Shrock; Pell, Leigh; Rogers, Tom
Subject: RE: Request for Approval of NO2 Tier 3 modeling procedure

Hi Stan:

It has been a while since we and Jacksonville Lime requested consideration of Tier 3 for the project.

I'm sure all the great data we acquired from the power plants located in Jacksonville justifies the presumed low NO2/NOx in-stack ratios.

I believe the company agreed to the higher range of 0.14 (NO2/NOx) for emissions from the lime facility kiln stack.

We had planned to issue a draft permit on or about December 15 premised on approval of Tier 3 for this project.

Any idea when we can expect concurrence/approval?

Thank you.

Al Linero.

A.A. Linero, P.E.
State of Florida DEP
Office of Permitting and Compliance
850-717-9076

From: Rogers, Tom
Sent: Wednesday, October 16, 2013 2:11 PM
To: Krivo.Stanley@epamail.epa.gov
Cc: ScottR Davis; John Shrock; Linero, Alvaro; Pell, Leigh
Subject: Request for Approval of NO2 Tier 3 modeling procedure

Stan,

Attached is the modeling protocol submitted by the applicant, and request for approval of a non-guideline modeling technique for the proposed Jacksonville Lime facility to be located in Jacksonville, Florida. The non-guideline modeling approach is for the use of the OLM Tier 3

procedure for the evaluation of projected NO₂ concentrations against the NAAQS. The company proposes to use the EPA Tier 3 default NO₂/NO_x in-stack ratio of 0.5 for all of the modeled sources in the cumulative analysis except for the sources at Jacksonville Lime and the coal boilers at the nearby JEA Northside power plant. In these cases, specific stack NO₂/NO_x ratios obtained from data at these and similar sources is proposed to be used.

The NO₂/NO_x ratios for the proposed Jacksonville Lime kilns derive from data taken at similar kilns operated by the parent company in other states. The department has reviewed these data and has concluded the ratios are appropriate to use for this project.

The NO₂/NO_x ratios for two of the coal boilers at the JEA facility (units 16 and 17) derive from data taken at similar coal boilers at the Seminole power plant located in Palatka, Florida. These boilers have the same basic configuration as those located at JEA. The data would indicate that a ratio of 2 percent or less is appropriate, but a conservative value of 10 percent is proposed to be used. It should be noted that direct measurement of these ratios from the JEA units 16 and 17 will be made in a test to occur in November. We can report the results of this test to you once we have these data. Direct measurement of NO₂/NO_x ratios are available for two circulating fluidized bed coal-fired boilers at the JEA facility (units 1 and 2). These data indicate average values well below 1 percent, but a value of 10 percent is proposed for the modeling evaluation. The department has evaluated these data and has further evaluated data from many other coal-fired boilers, and has concluded that the NO₂/NO_x ratios for these types of sources is almost always less than 5 percent, and often less than 2 percent.

See the modeling protocol for additional information. The department recommends that the proposed use of the Tier 3 modeling approach be approved, along with the proposed NO₂/NO_x ratios.

Regards,
Tom

Thomas G. Rogers
Environmental Consultant
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Business Planning
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