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July 17, 2000

Clair Fancy, P.E.  
Division of Air Resources Management  
Florida Department of Environmental  
Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

JUL 20 2000

BUREAU OF AIR REGULATION

RE: Gulf Coast Recycling AC Permit Application - Refining Kettles

Dear Mr. Fancy:

We are forwarding a copy of GCR's AC Permit Application to construct six new 78 Ton Refining Kettles to replace the three existing 72 Ton Refining Kettles at their Tampa Facility. They also want to replace the existing baghouse with a newer one to control the six new kettles. GCR told us that these new kettles will have a higher capacity, but they are willing to operate them at a lower process rate until the new blast furnace is constructed (GCR is planning to submit a PSD Permit Application for a new blast furnace around October 1 of this year). Once the blast furnace is permitted, GCR will then request an increase in production rate.

However, it is our opinion that the construction of the six new kettles and blast furnace is one project, and should be permitted as such. To issue and AC Permit for these new kettles and artificially limit their production until the new blast furnace is permitted and constructed, would result in the issuance of a "Sham Permit" under the EPA's NSR/PSD Policy. Both the refining kettles and blast furnace would require BACT on all the pollutant that caused a significant increase. We are, therefore, transferring the permit application to you for your follow-up. We have stated our position to GRC, however, if you have another position, please let us know.

Sincerely,

Alice H. Harman, P.E.  
Chief, Air Permitting Section

cc: Sterlin Woodard, P.E., EPCHC  
Joyce Morales, Gulf Coast Recycling