

Mitchell, Bruce

From: Mitchell, Bruce
Sent: Wednesday, March 10, 2010 1:53 PM
To: 'Liang, Kit'
Cc: Koerner, Jeff
Subject: RE: SWA Air Permit No. 0990234-015-AC/PSD-FL-108H - Clarification

3/10/2010

Good afternoon, Kit. After discussions with Jeff, we concur with you that the CO limits are to be viewed as a 'block average' and are as follows: 400 ppmvd corrected to 7% O₂, 4-hr block average, and 200 ppmvd corrected to 7% O₂, 24-hr block average. The CO CEMS measurement timeframe is midnight-to-midnight and, as such, is a 24-hr block average (see specific condition #14, in AC Permit PSD-FL-108A, issued January 14, 1992). Take care.

Bruce

From: Liang, Kit [mailto:KLiang@PIRNIE.COM]
Sent: Tuesday, March 09, 2010 11:56 AM
To: Mitchell, Bruce
Subject: SWA Air Permit No. 0990234-015-AC/PSD-FL-108H - Clarification

Hi Bruce,

The Solid Waste Authority permit for the refurbishment of the boilers does not specify what the 4-hour CO average permit limit is based upon under the Revised Conditions to Previous Permits, Specific Condition 3.c.. Please confirm that the 400 ppmvd **4-hour CO average** is based upon a **block average** since the Cb regulations are based upon block averages and the all the Title V references to CO limits are based on block average.

Thanks,
Kit

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3/10/2010