

Walker, Elizabeth (AIR)

From: Arif, Syed
Sent: Monday, July 26, 2010 10:17 AM
To: Walker, Elizabeth (AIR)
Subject: FW: Comment on Draft Permit 0570005-035-AC and PSD-FL-355A

Elizabeth,

This might be the only document that might be missing in the official folder. I don't believe Pradeep submitted a hard copy of the comments on this project.

Syed

From: Pradeep Raval [mailto:praval@kooglerassociates.com]
Sent: Tuesday, June 29, 2010 9:48 AM
To: Arif, Syed
Cc: 'Brunk, Ron'
Subject: Comment on Draft Permit 0570005-035-AC and PSD-FL-355A

Syed: This comment is submitted in response to FDEP's Draft Permit 0570005-035-AC and PSD-FL-355A for CFI's clarifiers project.

As per our discussion, CFI plans to operate the clarifiers continuously. The acid to be clarified will continue to flow into the clarifiers and the clarified acid will continue to flow out. Therefore, CFI proposes to conduct the requested two initial tests for informational purposes, with the test reports to be submitted to you, using EPA Method 13B on each PAP stack in the following way:

One test would be conducted with the clarifiers operating normally and with the dampers on the air exhaust in open position. The second test would be conducted soon after, with the clarifiers operating normally but with the damper on the exhaust closed as much as possible. The damper may not be closed all the way as that would result in a build up of fumes and result in fugitive emissions from the clarifiers. Please note that the clarifiers will only be operated with the dampers in open position after this initial testing is completed as this would reflect normal operating conditions.

We therefore request that the Specific Condition 7 be reworded to state: "annual compliance testing shall be conducted under normal operating conditions".

Please let me know if you have any questions.

Regards,

Pradeep Raval

Koogler and Associates, Inc.

4014 NW 13th Street

Gainesville, FL 32609

tel: 352-377-5822

cell: 352-317-8635

fax: 352-377-7158

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