

From: Don Bryan [don.b@tfp-hi.com]
Sent: Tuesday, April 24, 2007 4:47 PM
To: Matsumura, April Mido
Subject: Tradewinds Air permit

April

Your memo of last week (April 20) informed us of your decision to base the HAP emissions estimates for the Tradewinds Mill solely on AP-42 factors, with the exception that Tradewinds may propose a different emission factor for hydrogen chloride (HCl) that will avoid causing the project to reach the Major Source thresholds of 10 tpy for one HAP or 25 tpy for all HAPS. We understand that use of an alternate factor in this manner will lead to a permit condition requiring verification by source testing. Tradewinds wishes to pursue this option. Our proposed emission factor and the rationale for its selection are described below.

Based on the HAP emissions table attached to your e-mail of April 5, which assumes year-round full load operation of the boiler (8,760 hours per year x 132.4 MMBtu/hr), the total HAP emissions for the boiler and dryer calculated by AP-42 factors add up to about 24.73 tons and 5.36 tons, respectively. We think you meant these totals to be 22.15 and 7.93 tons, respectively because you had the 2.57 tons of methanol in the boiler column instead of the dryer column where it should be.

Tradewinds proposes to accept a permit limit on boiler HCl emissions that will bring the maximum potential emissions of this compound below 10 tpy and the total potential project HAP emissions below 25 tpy. Based on your assumption of continuous, full-load operation for the entire year, the HCl emission factor that would accomplish both these objectives with a margin of safety (total HAPS below 24 tpy) is 0.008 lb/MMBtu. By our calculations, using this emission factor reduces the estimated HCl emissions from the boiler to 4.64 tpy and total project HAPs to 23.84 tons (including the 7.93 tons for the dryer).

The proposed HCl emission factor is about 12 times higher than the NCASI factor used in our application (0.00067 lb/MMBtu), which we believe was technically justified for the reasons presented previously. However, in the interest of expediting the permit review and ensuring that the mill will be permitted as a minor source of HAPs, Tradewinds will agree to conduct source testing for HCl after boiler commissioning to demonstrate that actual emissions will not exceed 0.008 lb/MMBtu. We believe that such testing will demonstrate that actual emissions are well below this level.

Please let me know if you have any questions or concerns regarding this or any other aspect of your permit evaluation. We appreciate having the opportunity to discuss issues such as the one described above as this process continues.

Best Regards - Don Bryan