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Department of Environmental Protection

Lawton Chiles
Governor

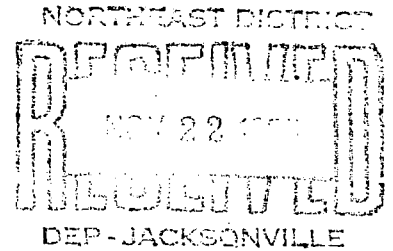
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 17, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206



Dear Mr. Baker:

Re: DEP File PSD-FL-228, AC 01-267311
Florida Rock Industries, Proposed Cement Plant

Enclosed is the Department's response to comments submitted on November 1, 1995 on your behalf by Oertel, Hoffman, Fernandez and Cole about the Department's draft permit for the planned cement plant in Alachua County. We prepared our response in the form of an Interim Determination indicating our intended changes in the draft permit. We also addressed comments from the Department's Northeast District.

Please note that we expect additional comments based on a public hearing to be held in Alachua County. We will issue our Final Determination after consideration of those comments, comments included in the Haile Community Association's petition for an administrative hearing, and the disposition of that administrative hearing request.

If you have any questions regarding this matter, please call Ms. Teresa Heron or Mr. A. A. Linero at (904)488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/aal/l

Enclosure

John D. Baker
November 17, 1995
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cc: Ernie Frey, NED
Jeff Braswell, DEP
Pat Reynolds, NED
Arthur Saarinen, HCA
Mona Sullivan, Alachua County
Segundo Fernandez, OHF&C
Priscilla Harris, Esq.
John Koogler, K & A

Interim Determination

**Florida Rock Industries, Inc.
Newberry, Alachua County, Florida**

**Portland Cement Plant
AC 01-267311
PSD-FL-228
Alachua County**

**Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation**

November 17, 1995

INTERIM DETERMINATION

Florida Rock Industries
PSD-FL-228/AC01-267311
Alachua County

The Florida Rock Industries (FRI) application for a permit to construct a dry process portland cement kiln with a maximum clinker production capacity of 95.8 tons per hour (TPH) and associated equipment consisting of a clinker cooler, preheater/precalciner, crushers, raw mill, finish mill, material and fuel handling equipment, silos, and shipping facilities near Newberry, Alachua County was reviewed by the Bureau of Air Regulation in Tallahassee. The Technical Evaluation and Preliminary Determination for the permit was distributed on September 29, 1995. The Notice of Intent was published in the Gainesville Sun on October 3, 1995. Copies of the evaluation were available for inspection at the Department's offices in Gainesville, Jacksonville, and Tallahassee as well as at the Alachua County Environmental Protection Department.

No adverse comments were submitted by either the U.S. Department of Interior or the U.S. Environmental Protection Agency. Comments were submitted by the Department's Northeast District Solid Waste Section.

Comments regarding the Best Available Control Technology (BACT) Determination and the Specific Conditions of the proposed permit were submitted by Mr. Segundo Fernandez of Oertel, Hoffman, Fernandez & Cole, P.A. (OHF&C) on behalf of FRI in a letter dated November 1, 1995. Additionally, OHF&C filed for an extension of final date to petition for an administrative hearing to preserve their clients rights while a seeking resolution of the disputed issues with the Department. This Interim Determination reflects the resolution of most of those issues as well as the those of the Department. It will be revised (as a Final Determination) at a later date, as necessary, based on a public hearing to be held in Newberry, Florida and a possible administrative hearing requested by the Haile Community Association.

The Department held a meeting with FRI on October 24, 1995 to discuss the issue of the Best Available Control Technology (BACT) Determination for nitrogen oxides (NOx) with which FRI disagreed. The Bureau has considered the technical arguments presented by FRI as well as their comments submitted through OHF&C, those of the Northeast District and made the interim changes discussed below.

OHF&C/FRI recommended a number of miscellaneous changes in the Technical Evaluation and Preliminary Determination as well as in the Best Available Control Technology (BACT) documents.

The requested revisions of the specific conditions of the permit are discussed and the Department's response and any changes agreed to are as follows:

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DEP PERMIT NUMBER PSD-FL-228 and AC01-267311

A. SPECIFIC CONDITION 3

FRI/OHF&C COMMENTS:

Delete hourly production rate on an annualized basis. Specify dry feed rate into kiln as basis for estimating clinker production. Dry feed monitoring is already required by the New Source Performance Standard for Cement Kilns.

DEPARTMENT RESPONSE:

Department agrees that the maximum hourly clinker production rate, together with the total annual clinker production limit are sufficient and that an average annualized hourly production rate is redundant. The Department agrees to methodology relating dry feed rate to clinker production rate. It would be difficult to measure clinker production rate directly because gypsum is mixed with clinker in the finish mill and the product is cement. Condition 3 is changed as follows:

FROM:

3. The kiln clinker production rate shall not exceed 95.8 tons per hour (TPH) and 2300 tons per day (TPD). On an annual basis, the clinker production rate shall not exceed 81.3 TPH, 1,952 TPD, and 712,500 tons per year (TPY). Continuous operation is allowed (8,760 hours per year) as long as the 712,500 TPY limit is not exceeded. [Rule 62-212.200(58), F.A.C.]

TO:

3. The kiln clinker production rate shall not exceed 95.8 tons per hour (TPH) and 2300 tons per day (TPD). On an annual basis, the clinker production rate shall not exceed 712,500 tons per year (TPY). The clinker production rate will be determined as a function of the preheater dry feed rate. The preheater dry feed rate is limited to 149.9 TPH and 1,114,350 TPY. Continuous operation is allowed (8,760 hours per year) as long as the 712,500 TPY clinker limit is not exceeded. [Rule 62-212.200(58), F.A.C.]

B. SPECIFIC CONDITION 4

FRI/OHF&C COMMENTS

Remove sulfur limit for coal as unnecessary in view of continuous SO₂ limit. Describe tire feed point near the kiln calciner burner instead of into the kiln calciner.

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DEPARTMENT RESPONSE:

The Department included an emission limit based on SO₂ emissions per ton of clinker produced. Sulfur dioxide emissions are apparently not very sensitive to the sulfur content in the coal but rather to the balance between alkali and sulfur in the kiln feed and kiln operating conditions. The continuous emission monitoring system will insure compliance with the sulfur dioxide emission standard. The Department will remove the coal sulfur limit and specify the tire feed point as follows:

FROM:

4. Fuels fired in the pyroprocessing system (kiln and calciner) shall not exceed a total maximum heat input of 364 MMBtu/hr and shall consist only of coal, whole tires, and unused No. 2 fuel oil which may also be fired in the Raw Mill Air Heater. All fuel usage shall be in compliance with the following limits and conditions: [Rule 62-212.200(58), F.A.C.]

a. The maximum sulfur content of the coal fired in the pyroprocessing system shall not exceed 0.75% sulfur, by weight. The coal usage rate shall not exceed 14.0 TPH. The coal sulfur content shall be determined using ASTM Method D-2234, D-3173, D-3176, D-3177 or D-4239.

b. Whole tires fired may be fed continuously to the kiln calciner burner at a rate not to exceed 109.2 MMBtu/hr (30% of total kiln fuel input) or 4.2 TPH. and 36,792 TPY. Before initiating tire firing, the gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum of 1,440 degrees F for at least one hour.

c. No. 2 fuel oil fired shall not exceed a maximum sulfur content of 0.05% by weight (certified by fuel supplier) and usage shall not exceed 2,486,000 gallons per year for the Raw Mill Air Heater and 125,000 gallons per year for kiln startup.

TO:

4. Fuels fired in the pyroprocessing system (kiln and calciner) shall not exceed a total maximum heat input of 364 MMBtu/hr and shall consist only of coal (usage rate shall not exceed 14.0 TPH), whole tires, and unused No. 2 fuel oil which may also be fired in the Raw Mill Air Heater. All fuel usage shall be in compliance with the following limits and conditions: [Rule 62-212.200(58), F.A.C.]

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a. Whole tires fired may be fed continuously through an air lock near the kiln calciner burner at a rate not to exceed 109.2 MMBtu/hr (30% of total kiln fuel input) or 4.2 TPH. and 36,792 TPY. Before initiating tire firing, the gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum of 1,440 degrees F for at least one hour.

b. No. 2 fuel oil fired shall not exceed a maximum sulfur content of 0.05% by weight (certified by fuel supplier) and usage shall not exceed 2,486,000 gallons per year for the Raw Mill Air Heater and 125,000 gallons per year for kiln startup.

C. SPECIFIC CONDITION 5/Table II

OHF&C/FRI COMMENTS

FRI indicated that proposed nitrogen oxide (NO_x) BACT limit of 2.5 pounds per ton of clinker (lb/ton clinker) is too stringent particularly with continuous monitoring. The kiln manufacturer, Polysius, would not guarantee a NO_x limit less than approximately 4 lb/ton clinker, nor would they agree to a guarantee for the performance of their system (including quality of cement) in conjunction with Selective Non-Catalytic Reduction (SNCR). FRI and Polysius claimed that the higher moisture of limestone in Florida compared with California (source of NO_x BACT determination) results in greater consumption of fuel and, therefore, higher NO_x emissions per ton of clinker produced. They also claim that the lower volatility of Eastern coal results in higher NO_x emissions. Their position is that the 2.5 lb/ton clinker limit for the California plant equates to 3.8 lb/ton at the Newberry site.

FRI also requests that the Department postpone setting the final NO_x and SO₂ limits for a period of two years following startup.

DEPARTMENT RESPONSE:

The Department agrees that there should be a correction to equalize the emission limits from the Monterrey (California) Plant to Florida conditions with respect to the extra heat required to dry the limestone but not to correct for fuel volatility. This corresponds to a NO_x limit of 2.8 pounds per ton clinker. The Department rejects the manufacturer's claims that it cannot guarantee a lower NO_x limit than 4 lb/ton clinker.

The Department will allow a period of two years after startup for FRI to comply with a NO_x limit of 2.8 lb/ton clinker. This will provide FRI and Polysius time to fully assess the performance of

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the kiln without add-on NO_x control equipment and to design, install and test any additional equipment to comply the the Department's revised BACT limit. During the interim period, the limit will be 3.8 lb/ton clinker.

The Department believes that it will still be possible to set a final SO₂ limit soon after startup of the facility and that it should be possible to reasonably predict the effects of additional NO_x control projects (if needed) on SO₂ emissions. Therefore no changes in the required compliance schedule will be made for any pollutant except NO_x. Thus Condition 5 and Table II are amended as follows:

FROM:

5. Emissions from the facility shall comply with the pollutant limits specified in attached Tables I and II. Following completion of the performance tests required herein, the interim SO₂ emission limit may be revised based on the test results (and alkali/sulfur materials ratios) such that overall control attained for all air pollutants including, SO₂, NO_x, VOC, and CO, is optimized. The Department shall issue the final SO₂ emission limits within 120 days following receipt of all test results required by this permit. Any changes will be publicly noticed.

TO:

5. Emissions from the facility shall comply with the pollutant limits specified in attached Tables I and II. Following completion of the performance tests required herein, the interim SO₂ emission limit may be revised based on the test results (and continuous emission monitoring data) such that overall control attained for all air pollutants including, SO₂, NO_x, VOC, and CO, is optimized. The Department shall issue the final SO₂ emission limits within 120 days following receipt of all test results required by this permit. Any changes will be publicly noticed.

FROM:

POLLUTANT	BACT EMISSION LIMIT		EMISSION RATE		BASIS
	lb/ton clinker	lb/ton dry feed	lbs/hr	tons/yr	
NO _x (kiln)	2.50	1.60	245.17	915.53	BACT

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TO:

	BACT EMISSION LIMIT		EMISSION RATE		BASIS
	lb/ton clinker	lb/ton dry feed	lbs/hr	tons/yr	
POLLUTANT					
NO _x (kiln)**	2.8	1.8	268.3	1018	BACT

****Note:** During first two years after startup, kiln shall not exceed a NO_x limit of 3.8 lb/ton clinker and 2.8 lb/ton clinker thereafter. The Department may revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on compliance test and continuous emission monitoring data.

D. SPECIFIC CONDITION 6

OHF&C/FRI COMMENTS:

Clarify test methods to more accurately indicate their specific purposes - NSPS, BACT limits, process control and optimization, etc.

DEPARTMENT RESPONSE:

The Department concurs with FRI rationale regarding continuous emission monitors and test methods. However, the Department disagrees with the proposed two years compliance period to determine compliance with the BACT emission limits. The compliance period will not be changed for any pollutant, except that the NO_x limit during the first two years after start up, shall not exceed a maximum of 3.8 lb/ton clinker. Thereafter this limit shall not exceed 2.8 lb/ton clinker (30-day rolling average). The Department may lower this limit to less than 2.8 lb/ton clinker (30-day rolling average) based on compliance test and continuous emission monitoring data. Specific Condition No. 6 is therefore changed as follows:

FROM:

6. EPA-reference methods for sampling pollutants shall consist of 3 consecutive test runs, each of one hour duration, shall be performed on the kiln and cooler stacks for each pollutant specified in Tables I and II.

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Continuous monitoring equipment shall be installed, operated, and used to determine compliance for NO_x and SO₂. Continuous emission monitors shall be installed and certified, before the initial performance test, and operated in compliance with 40 CFR 60, Appendix F, Quality Assurance Procedures (1994 version) or other Department approved QA plan; 40 CFR 60 Appendix B, Performance Specification 1, 2, and 3 (1994 version).

Continuous opacity monitors shall be installed, operated, and maintained at both stacks pursuant to 40 CFR 60.63.

Continuous monitors shall be installed for CO and/or O₂ for use in determining plant operating parameters to optimize emissions of CO, NO_x, and SO₂ and to set a final SO₂ limit.

Performance tests shall begin within 60 days after achieving and maintaining the permitted production rate, but not later than 180 days after initial operation at that rate, using the following EPA reference methods:

- Method 5 Determination of Particulate Matter Emissions from Stationary Sources
- Method 9 Visual Determination of the Opacity of Emissions from Stationary Sources
- Method 10 Determination of Carbon Monoxide Emissions from Stationary Sources
- Method 22 Visual Determination of Fugitive Emissions from Material Sources
- Method 25 Determination of Volatile Organic Compound Emissions from Stationary Sources
- Method 104 Determination of Beryllium Emissions from Stationary Sources (40 CFR 61, Appendix B)

The manual stack tests shall be conducted while firing both primary fuels at permitted capacity (70% coal and 30% tires) and while all continuous monitoring systems are functioning properly, and with all process units operating at their permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the units may be tested at less than 90% of the maximum operating rate allowed by the permit. In this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the units are so limited, then operation at higher capacities (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.340(1)(a), F.A.C.]

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TO:

6. EPA-reference methods for sampling pollutants shall consist of 3 consecutive test runs, each of one hour duration, shall be performed on the kiln and cooler stacks for each pollutant specified in Tables I and II.

Continuous monitoring equipment shall be installed, operated, and used to determine compliance with the emission limits for NO_x and SO₂ from the kiln. Since the emission limits are on a mass basis, a continuous flow monitor will be installed. Continuous emission monitors shall be installed and certified, before the initial performance test, and operated in compliance with 40 CFR 60, Appendix F, Quality Assurance Procedures (1994 version) or other Department approved QA plan; 40 CFR 60 Appendix B, Performance Specification 1, 2, and 3 (1994 version).

Continuous opacity monitors shall be installed, operated, and maintained at the kiln/raw mill ESP stack and the clinker cooler ESP stack pursuant to 40 CFR 60.63. A continuous monitor for temperature shall be installed, operated, and maintained at the coal mill baghouse exhaust [8-17] pursuant to 40 CFR 60.253.

Continuous monitors shall be installed for CO and/or O₂ for use in determining plant operating parameters to optimize emissions of CO, NO_x, and SO₂ and to set a final SO₂ limit. These monitors (CO and/or O₂) are process monitors and are not subject to 40 CFR 60, Appendix B.

Performance tests shall begin within 60 days after achieving and maintaining the permitted production rate, but not later than 180 days after initial operation at that rate, using the following EPA reference methods:

- Method 5 Determination of Particulate Matter Emissions from Stationary Sources
- Method 9 Visual Determination of the Opacity of Emissions from Stationary Sources
- Method 10 Determination of Carbon Monoxide Emissions from Stationary Sources
- Method 22 Visual Determination of Fugitive Emissions from Material Sources
- Method 25A Determination of Volatile Organic Compound Emissions from Stationary Sources
- Method 104 Determination of Beryllium Emissions from Stationary Sources (40 CFR 61, Appendix B)

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The manual stack tests shall be conducted while firing both primary fuels at permitted capacity (70% coal and 30% tires) and while all continuous monitoring systems are functioning properly, and with all process units operating at their permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the units may be tested at less than 90% of the maximum operating rate allowed by the permit. In this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the units are so limited, then operation at higher capacities (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.340(1)(a), F.A.C.]

At least 30 days prior to conducting the initial performance tests required by this permit, the permittee shall submit to the DEP's Northeast district office, for their review and approval, a protocol outlining the procedures to be followed, test methods and any variations with those required by the reference methods.

The maximum allowable emission rate from the twenty (20) baghouses is limited to 0.01 grains/dscf. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, and because baghouse control devices are utilized, the Department, pursuant to the authority granted under Rule 62-297.620 (4), F.A.C., hereby allows a visible emission limitation not to exceed an opacity of 5% in lieu of the particulate stack test.

Should the Department have reason to believe the particulate emission standard is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by testing in accordance with Rule 62-297., F.A.C.

E. BACT DETERMINATION FOR MINOR SOURCES CONTROLLED BY BAGHOUSES

OHF&C/FRI COMMENTS:

To set an opacity limitation of 5% in lieu of stack testing for the twenty baghouses. They state that the BACT limit for the process baghouses as listed in the BACT Determination is 10%.

DEPARTMENT RESPONSE:

The Department agrees with the applicant. The Department intention is to limit minor sources controlled by baghouses to a 5% opacity standard. The 10% opacity limitation was a typographical error.

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This limitation, 5% opacity, is set in Table I., Allowable Opacity Limitations. The final BACT Determination will be corrected to 5% opacity to reflect the intended Department emission limit.

F. SPECIFIC CONDITION 7

OHF&C/FRI COMMENTS:

To change the recordkeeping provisions from 5 to 2 years.

DEPARTMENT RESPONSE:

The Department will not change this condition. The Department has elected to require 5 years of recordkeeping to be consistent with the new Title V requirements.

G. SPECIFIC CONDITION 9

OHF&C/FRI COMMENTS:

FRI requested that the quarterly submittal of records be applied to the excess emission report only in accordance with 40 CFR 60.7.

DEPARTMENT RESPONSE:

The Department agrees with FRI rationale. However, the 5 years recordkeeping provision will remain unchanged. Specific Condition No. 9 will be changed as follows:

FROM:

9. All measurements, records, and other data required to be maintained by the permittee shall be reported to the Northeast District office on a quarterly basis with the start of commercial operation in accordance with 40 CFR 60.7. All measurements, records and other data required to be maintained by the permittee shall be retained for at least 5 years following the date on which such measurements, records, or data are recorded. The data shall be available to Department staff as requested. [40 CFR 60.7]

TO:

9. An excess emission report shall be supplied to the Northeast District office on a quarterly basis with the start of commercial operation in accordance with 40 CFR 60.7. All measurements, records and other data required to be maintained by the permittee shall be retained for at least 5 years following the date on which such measurements, records, or data are recorded. The data shall be available to Department staff as requested. [40 CFR 60.7]

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H. SPECIFIC CONDITION 10

OHF&C/FRI COMMENTS:

To change this condition since the coal shipped and received is wet. They state that NSPS, Subpart Y, allows an opacity limitation of 20%.

DEPARTMENT RESPONSE:

This condition will not be changed. A similar facility is meeting the standard set in this condition.

I. SPECIFIC CONDITION 12

OHF&C/FRI COMMENTS:

FRI indicated that there is no link between excess emissions and the use of tires as fuel and therefore no reason to stop feeding tires when excess emissions are experienced.

DEPARTMENT RESPONSE:

The Department agrees with FRI and will rely on compliance procedures and rule provisions (Rules 62-210.700) related to excess emissions and malfunctions to insure the emissions limits are met while leaving it to FCS to determine the best way to remedy emission limit exceedances. Therefore, Condition 12 is deleted as follows:

~~12. In the event of any malfunction resulting in failure of emission control equipment or any malfunction of process equipment resulting in kiln emissions exceeding limits set forth in Tables I and II, the operator shall immediately stop the feeding of tires into the kiln and shall not resume the firing of tires until the emission control equipment has been put into proper working order. [Rules 62-212-200(50), 62-212-200(107)].~~

J. SPECIFIC CONDITIONS 18, 19 and 20 - SOLID WASTE REVIEW

OHF&C/FRI COMMENTS:

FRI stated that gypsum, coal ash and other types of iron oxide intended for use as raw materials are defined as recyclable materials and not as solid waste under F.A.C. Rule 62-701. FRI asked for a description of Contingent Management Practice for Cement Kiln Dust (CKD) contained in Specific Condition 19. In

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addition, FRI requested to delete Specific Condition 20 related to disposition of CKD and other baghouse catches which may come into contact with the ground.

DEPARTMENT (NE DISTRICT SOLID WASTE SECTION) COMMENTS:

Indicated that Specific Condition 16 does not reflect the information that the permittee agreed to in the RAI. Requested that it be corrected.

Indicated that Specific Condition 20 would allow the Permittee to use ESP and baghouse catches including selling or reusing it anywhere, for any purpose. Requested that it be revised to the version originally proposed by the District.

DEPARTMENT (NEW SOURCE REVIEW SECTION) RESPONSE:

The Department (NEW SOURCE REVIEW SECTION) will incorporate Solid Waste Conditions as requested by the NE Solid Waste Section. If any further changes are requested by the applicant, they will be addressed by the Northeast Solid Waste Section. The revised Solid Waste conditions are as follows:

FROM:

16. The permittee shall limit the number of tires on site in order to protect against fires and mosquitoes. The permittee shall develop a program, for review and approval by the Department, which prevents breeding of mosquitoes due to tire handling at the site. The plan will include at least receiving, handling, treatment, storage, and inventory turnover provisions. This program shall be a condition of the operating permit.

20. In the event that baghouse or ESP catches come in contact with the soil, the waste shall be collected and a hazardous waste determination performed for metals in accordance with 40 CFR 262.11 and FAC Rule 62-730.160. If the material is not hazardous, it shall be reused, sold or disposed a permitted lined landfill. If the material is hazardous, it shall be disposed in a permitted hazardous waste disposal facility.

TO:

16. The Permittee shall not place waste tires on the ground. Waste tires shall be received in closed vans and unloaded directly into the tire feeding hopper. Also, in order to control mosquitoes at the site, waste tires shall be sprayed with an insecticide prior to receipt at the facility.

Revised Preliminary Determination
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20. In the event that baghouse or ESP catches come in contact with the soil, the waste shall be collected and a hazardous waste determination performed for metals in accordance with 40 CFR 262.11 and FAC Rule 62-730.160. If the hazardous waste determination indicates that the material is hazardous, it shall be disposed of in a permitted hazardous waste disposal facility. If the material is not hazardous, the waste material is a solid waste as defined in FAC Chapter 62-701 and must be disposed of in a permitted, lined landfill. The Permittee shall contact the Solid Waste Section, Northeast District Office, at telephone number (904) 448-4320, prior to disposal of the fugitive baghouse or ESP catches which are to be disposed of as solid waste.

CONCLUSION:

The Department intends to issue the Federal construction permit, PSD-FL-228, and State permit, AC01-267311, with the changes noted above as well as changes in consideration of public comments expected from a future public hearing, comments received in a recently filed petition for an administrative hearing, and the disposition of that petition. The BACT determination will be finalized in conjunction with the preparation of the Final Determination and Permit.