

## Reynolds, John

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**From:** Mitchell, Bruce  
**Sent:** Tuesday, January 23, 2001 10:15 AM  
**To:** Wider, Russell  
**Cc:** Sheplak, Scott; Reynolds, John; Linero, Alvaro; Fancy, Clair  
**Subject:** Pre-DRAFT Title V Operation Permit Comments: Florida Rock Industries, Inc.: 0010087-002-AV.

1/23/01

I have attached a draft of the comments of the above referenced pre-DRAFT Title V Operation Permit that have been collectively identified by me, Russell and John. This is my version of the discussions that I have had with you/them. Please check the comments listed against what you have and provide me with any suggestions/critiques/edits that you might have so we can provide Leslie Maybin and Chris Kirts (NED) the comments today, as promised; and, it is hoped that we can call them and discuss each comment with them for understanding (hope to do this this afternoon, also). Many thanks.



0010087.doc

Bruce

TO: Leslie Maybin/Chris Kirts, Northeast District

FROM: Bruce Mitchell/Russell Wider/John Reynolds, BAR

DATE: January 23, 2001

SUBJ: Pre-DRAFT Title V Operation Permit Review: 0010087-002-AV  
Florida Rock Industries, Inc.  
Alachua County

Thank you for using the formats, for it made readability much easier. The comments that we have are provided and look forward to discussing them with you.

A. (xxxxxxd.doc)

1. Section I. Facility Information. Subsection A. Facility Description.

a. The PSD permit number is: PSD-FL-228 (not "288"). It is recommended that you reference it, the AC and the BACT, including their dates of issuance, in the 4th paragraph, such as:

.....Plants; and, AC01-267311/PSD-FL-228 and BACT, issued 12/23/96 and 12/20/96, respectively. This facility .....

2. Section II. Facility-wide Conditions.

a. Condition 2.

(1) Remove the qualifying phrase, "[**Not federally enforceable.**]", for it was in Specific Condition #14 in AC01-267311/PSD-FL-228. Therefore, the condition is "federally enforceable"; and, add the following to the justification:

[Rule ....., F.A.C.; and, AC01-267311/PSD-FL-228]

b. Condition 5.

(1) In the 1st sentence after the E.U. ID listing and brief description, change the PSD permit number to "228" from "288"; and, a search and replace needs to be done throughout the permit, for it is listed as such in several justifications and elsewhere.

(2) #1 of the Compliance Plan (CP): Recommend a period after 12/23/96 and delete the rest of the sentence.

(3) #2 of the CP: Recommend to start the beginning of the sentence as (while deleting up the word "authorize"):

2. An air construction permit shall be obtained to authorize.....

.....  
permit. Deadline date is 12/31/01.

(4) #3 of the CP: Provide a scope of the VOC monitoring that is/will be required with some specific timeframes/dates established.

(5) #4 of the CP: Provide when the beryllium tests are to begin.

c. Condition 6. Remove the qualifying phrase, "[**Not federally enforceable.**]", for it was SIP approved in March of 1972. Therefore, the condition is "federally enforceable" as it is written. Also, delete the contents of the justification after "F.A.C.", because nothing was recommended by the applicant.

3. Section III. Emission Unit(s) and Conditions.

a. General.

(1) In your justifications, it is recommended that you make the following edits:

FROM: [Air Construction Permit AC01-267311/PSD-FL-288]  
TO: [AC01-267311/PSD-FL-228]; and,

FROM: [Air Construction Permit AC01-267311/PSD-FL-288, BACT Determination dated December 20, 1996]  
TO: [AC01-267311/PSD-FL-228 and BACT]

(2) Tables I and II of AC01-267311/PSD-FL-228 were not identified nor incorporated in any part of the permit (see Specific Condition #5 of AC01-267311/PSD-FL-228). It is recommended that the following "new" Specific Condition be placed at the beginning of each Subsection's Specific Conditions under the title "**General**" and as follows:

**General.**

A.0. Tables I and II of AC01-267311/PSD-FL-228 are incorporated by reference.

or,

**General.**

B.0. Tables I and II of AC01-267311/PSD-FL-228 are incorporated by reference.

b. Subsection A.

(1) Specific Conditions (SCs) A.2., A.3. and A.5. Edit the justifications as recommended above in A.3.a.(2).

(2) SC A.4. Delete the text after the word "annually" and place a period here; and, the actual testing dates go **only** in Table 2-1, not in the Title V permit. In addition, the frequency requirements are contained in Rule 62-297.310(7)(a)4., F.A.C., which is cited in Subsection I. Finally, the justification for this condition should be:

[Rule 62-297.310(7)(a)4., F.A.C.]

(3) SC A.5. It is recommended that you change "as outlined in" to "in accordance with" or "pursuant to" for consistency purposes; and, it is recommended that you do a search throughout the permit to replace the many uses of it in several SCs.

(4) SC A.6. Since SCs I.13. and I.14. are identical and one will be deleted, then change the SC to read as:

Common conditions I.1. - I.13.

c. Subsection B.

- (1) SC B.1. Add the following reference in the justification:  
[Rules62-....., F.A.C.; and, AC01-267311/PSD-FL-228]
- (2) SC B.2. Due to SC #4.c. of AC01-267311/PSD-FL-228, change "280" to 2,486,000; change "hour" to "year"; change "shall" to "is allowed to"; and, edit the justification as recommended above in A.3.a.(2).
- (3) SCs B.4., B.6., B.8. and B.10. Edit the justifications as recommended above in A.3.a.(2).
- (4) SC B.6. Recommend that you change the title from "**Sulfur Dioxide.**" To "**Sulfur Content - Fuel Oil.**"; insert "unused No. 2" between "the and fuel" ; and, place a period after "weight", while deleting the rest of the text.
- (4) SC B.7. Delete the text after the word "annually" and place a period here; and, the actual testing dates go **only** in Table 2-1, not in the Title V permit. In addition, the frequency requirements are contained in Rule 62-297.310(7)(a)4., F.A.C., which is cited in Subsection I.
- (5) SC B.8. The justification cited is the PSD rule "Rule 62-212.400, F.A.C." It is recommended that you delete everything except for "AC01-267311/PSD-FL-228".
- (6) SC B.12. See response A.3.b.(4).

d. Subsection C.

- (1) SCs C.1., C.2., C.3., C.6. thru C.17., C.19. thru C.32., and C.34. Edit the justifications as recommended above in A.3.a.(2).
- (2) SC C.4. Due to SC #3 of AC01-267311/PSD-FL-228, add to the condition the following text:  
..... hours/year, as long as the 712,500 TPY clinker limit is not exceeded.
- (3) SC C.5. Due to SC #4.d. of AC01-267311/PSD-FL-228, insert "of mercury compounds (as Hg)" between "input and in"; also, add the following justification:  
[AC01-267311/PSD-FL-228]
- (4) SC C.7. Due to SC #5 and Table II of AC01-267311/PSD-FL-228, change "30 lb/hr" to "30.00 lbs/hr".
- (5) SC C.9. Due to the BACT, change "(24-hr average)" to "(24-hr rolling average)". When does the testing and monitoring begin or when is the data from the testing and monitoring due?...some timeframe needs to be established here...SC C.14. establishes that a compliance test was conducted on 7/21/2000.
- (6) SC C.10. When is the startup date? ...there needs to be a startup date established here...SC C.14. establishes that a compliance test was conducted on 7/21/2000.
- (7) SC C.13. When is the starting date? ...there needs to be a starting date established here...SC C.14. establishes that a compliance test was conducted on 7/21/2000.
- (8) SC C.16. "Immediately" needs to be defined.
- (9) SC C.18.
  - (a) Table Note #1. Rule 62-297.310(7)(a)4., F.A.C., establishes the testing frequency.
  - (b) Table Note #2. Delete "within 60 days prior to the anniversary test date" and place any requirement related to this in Table 2-1.
  - (c) Table Note #3. The text ends with something missing from a citing from the CFR?  
....and 40 CFR   ?
- (10) SC C.19. This text is not consistent with SC #6 of AC01-267311/PSD-FL-228, nor is it consistent with Common Condition I.8.? It should be consistent with the SIP AC.
- (11) SCs C.21., C.22., C.27. and C.28. See response A.3.b.(3).
- (12) SC C.30. If the initial testing has been completed, then delete the ending statement of the SC, for it would be obsolete; and, if not, leave as stated.

- (13) SC C.35. Replace entire text with SC #7 of AC01-267311/PSD-FL-228.
- (14) SC C.36. Due to SC #4.d. of AC01-267311/PSD-FL-228, insert "and tires" between "coal and to".
- (15) SC C.37. See response A.3.b.(4).

e. Subsection D.

- (1) SCs D.1. thru D.11. Edit the justifications as recommended above in A.3.a.(2).
- (2) SCs D.9. thru D.11. See response A.3.b.(3).
- (3) SC D.12. Shift the justification to the left side by using the "Return Key" and change the justification as follows:
  - FROM: [F.A.C., 62-297.620(4)]
  - TO: [Rule 62-297.620(4), F.A.C.]
- (4) SC D.16. See response A.3.b.(4).

f. Subsection E.

- (1) SCs E.3. thru E.6. Edit the justifications as recommended above in A.3.a.(2).
- (2) SC E.5. See response A.3.b.(3).
- (3) SC E.7. See response A.3.b.(4).

g. Subsection F.

- (1) SCs F.3. thru F.6. Edit the justifications as recommended above in A.3.a.(2).
- (2) SC F.4. The "{Permitting note: .....}" references Condition "F.5." and should be referencing "F.4".
- (3) SC F.5. See response A.3.b.(3).
- (4) SC F.7. See response A.3.b.(4).

h. Subsection G.

- (1) SCs G.3. thru G.7. Edit the justifications as recommended above in A.3.a.(2).
- (2) SC G.5. The reference to "Facility-wide Conditions, Condition No. 9" we believe should be "No. 7".
- (3) SC G.6. See response A.3.b.(3).
- (4) SC G.8. See response A.3.b.(4).

i. Subsection H.

- (1) SCs H.1. thru H.4. The recommended way to reference rules and chapters are:
  - Chapter 62-xxx, F.A.C.
  - Rule 62-296.xxx, F.A.C.
- (2) SCs H.1. thru H.4. Edit the justifications as recommended above in A.3.a.(2).
- (3) SC H.2. In the last line, "SEP" should be "ESP".

j. Subsection I.

- (1) SCs I.1. thru I.5. Edit the justifications as recommended above in A.3.a.(2).
- (2) SC I.4. In the justification, insert "and" between the cited rules, delete the comma, and add ", F.A.C.; and," after the last rule citing.
- (3) SCs I.13. thru I.15. Since the SC I.13. and I.14. are identical texts, it is recommended that SC I.13. be deleted, and SC I.14. and SC I.15. be renumbered to SC I.13. and SC I.14., respectively.
- (4) SC I.14. (was SC I.15.). In the preceding header, "**Monitoring of Opertaions**", "Operations" is misspelled. Also, there appears to be some text missing?

k. Subsection J.

- (1) SC J.1. The reference to emissions units is usually as "Eus".

l. Subsection K.

- (1) General. It was difficult to determine which affected EU(s) go/goes with each SC.
- (2) SC K.2. The VE limit is less stringent than the one established in Table I, AC01-267311/PSD-FL-228. A Title V Permit cannot relax a SIP AC limit.
- (3) SC K.3. The VE limit is less stringent than the one established in Table I, AC01-267311/PSD-FL-228. A Title V Permit cannot relax a SIP AC limit.
- (4) SC K.4. Table Notes "e" and "i" are not consistent with Table 1 of AC01-267311/PSD-FL-228. A Title V Permit cannot relax a SIP AC limit.
- (5) SC K.5. The PM limit is less stringent than the one established in Table II: BACT, AC01-267311/PSD-FL-228. A Title V Permit cannot relax a SIP AC limit.
- (6) SCs K.5., K.6. and K.8. These SCs should be placed under the header "**Emission Limit and Standards**", and renumbered to K.4 thru K.6, respectively; and, all subsequent SCs should be renumbered where appropriate.
- (7) SC K.6. (new SC K.5.). To what EU(s) does this condition apply?
- (8) SCs K.7. (new K.8.) and K.10. See response A.3.b.(3).
- (9) SC K.8. (new SC K.6.). The exponent appears as a number.