

KOUGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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263-03-10
June 4, 2004

Via Email and USPS

RECEIVED

JUN 09 2004

BUREAU OF AIR REGULATION

Mr. Al Linero
FDEP
Twin Towers Office Bldg
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Subject:: *Rinker Materials Corporation
Miami Cement Plant, Miami, Florida
Permit No. 0250014-003-AV
Short-term Tests to Evaluate Kiln Production Capacity*

Dear Al:

This letter will confirm our telephone conversation of June 3, 2004 regarding tests by the Rinker Materials Corporation (Rinker) to evaluate the feasibility of a clinker production rate increase at the Rinker Miami Cement Plant. As you are aware, Department approval for these tests was previously granted but, for operational reasons, Rinker was unable to conduct the tests. The company is now ready to proceed.

Currently the plant is operating under Permit 0250014-003-AV, which limits the preheater feed rate to 220 tons per hour and the clinker production rate to 137 tons per hour; both on a 24-hour basis. Rinker would like to conduct short-term tests at higher production rates to determine the actual production capacity of the kiln system.

By this letter, I am requesting, on behalf of Rinker, Department approval to conduct kiln production rate tests for a 60-day period beginning with the approval of this request. During this test period, Rinker requests approval to operate the kiln system at a preheater feed rate up to 260 tons per hour. This corresponds to a clinker production rate of 162 tons per hour. The requested 260 ton per hour preheater feed rate limit represents an 18 percent increase over the currently permitted 24-hour average feed rate of 220 tons per hour.

The requested maximum test feed rate, representing an 18 percent increase over the permitted feed rate, is consistent with the rate increase recently demonstrated and permitted by Florida Rock Industries at the Thompson S. Baker Cement Plant in Newberry, Florida. At the Florida Rock plant, the permitted clinker production rate was 2300 tons per day (95.83 tons per hour). Testing demonstrated that the kiln system was capable of producing 2650 tons per day of clinker (110.2 tons per hour) on a 24-hour average basis with a peak clinker production of 115 tons per hour. These demonstrated production rate increases were permitted by the Department by Permit 0010087-006-AC/PSD-FL-228C.

The 110.2 ton per clinker production rate at the Florida Rock plant represents a 15 percent increase over the originally permitted rate, and the 115 ton per hour peak clinker production rate represents a 20 percent increase over the originally permitted rate. In the case of Rinker, the 260 ton per hour limit requested during the test period represents an 18 percent increase in feed rate over the presently permitted rate of 220 tons per hour.

As both the Rinker plant and the Florida Rock plant are modern dry process preheater/precalciner plants of the same vintage, it is reasonable to expect that the maximum production capacity of each plant will be approximately the same multiple of the guaranteed, and hence permitted, production rate. This would be expected even though the two plants were designed and constructed by different companies.

It should be noted that no physical construction to the kiln system will take place during the test period. The tests will be conducted strictly to determine the as-built capacity of the kiln system.

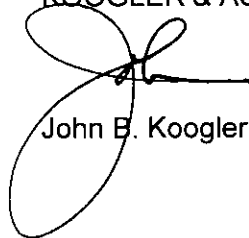
It should also be noted that during the requested tests, the emission limits permitted by Permit 0250014-008-AC will be complied with. These include the PM/PM10, SO₂, NO_x, CO, VOC, acid mist, mercury, lead, and visible emissions limits. The kiln, the clinker cooler, and the raw mill all exhaust through a common stack; therefore compliance with the aforementioned emission limits will assure that the entire kiln/cooler system remains in compliance. The compliance will be demonstrated by the continuous emission rate monitors for SO₂, NO_x, and VOC and the continuous opacity monitor.

Once the as-built capacity of the kiln system is established, Rinker will approach the Department and/or Miami/Dade County to amend the existing plant permit. At that point in time, the permitting details associated with the implementation of a rate increase can be discussed.

I appreciate your willingness to consider this matter again, and based on our telephone conversations, trust that approval for the requested tests can be granted in a relatively short time. If additional information is required to process this request, please do not hesitate to contact me.

Sincerely,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK/llt

cc: Scott Benyon
Mike Vardeman

