

DATE NOTICE OF PROPOSED RULE DEVELOPMENT  
PUBLISHED IN THE FAW: August 1, 1997

DEPARTMENT OF ENVIRONMENTAL PROTECTION  
DOCKET NO.: 97-28R

RULE TITLE: Prevention of Significant Deterioration (PSD)      RULE NO.: 62-212.400

PURPOSE AND EFFECT: The rule would be modified to reflect recent EPA rule amendments and guidance relating to pollutants subject to PSD review.

SUMMARY: The proposed amendments will bring the state's PSD preconstruction review rule into conformity with recently amended EPA rules and EPA guidance.

SUMMARY OF STATEMENT OF ESTIMATED REGULATORY COSTS: None.

Any person who wishes to provide a proposal for a lower cost regulatory alternative must do so within 21 days of this notice.

SPECIFIC AUTHORITY: 403.061 FS.

LAW IMPLEMENTED: 403.021, 403.031, 403.061, 403.087 FS.

A hearing will be held before the Environmental Regulation Commission at the time, date, and place shown below:

TIME AND DATE: 9:00 a.m., December 4, 1997

PLACE: Department of Environmental Protection, Room 609, Twin Towers, 2600 Blair Stone Road, Tallahassee, Florida

If an accommodation is needed for a disability in order to participate in this activity, please notify the Personnel Services Specialist at (850)488-2996/(800)955-8771 (TDD), at least 48 hours prior to the event.

THE PERSON TO BE CONTACTED REGARDING THE PROPOSED RULE IS: Larry George, Department of Environmental Protection, Division of Air Resources Management, Twin Towers Office Building, 2600 Blair Stone Road, Mail Station 5500, Tallahassee, Florida 32399-2400. Phone number (850)488-0114

THE FULL TEXT OF THE PROPOSED RULE IS:

62-212.400 Prevention of Significant Deterioration (PSD).

(2) Applicability. This subsection establishes the criteria for determining whether or not a proposed new facility or modification to a facility is subject to the preconstruction review requirements of this rule, either in whole or in part. The preconstruction review requirements of this rule include the applicable provisions of: Rules 62-212.400(4), F.A.C., General Provisions; 62-212.400(5), F.A.C., Preconstruction Review Requirements; 62-212.400(6), F.A.C., Best Available Control Technology (BACT); and 62-212.400(7)(6), F.A.C., Construction/Operation Permit Requirements; all as modified by the applicable provisions of Rule 62-212.400(3), F.A.C., Exemptions and Exclusions. A proposed new facility or modification that is not subject to the preconstruction review

requirements of this rule, either in whole or in part, may be subject to review requirements under other rules of this chapter.

TABLE 212.400-2  
REGULATED AIR POLLUTANTS -  
SIGNIFICANT EMISSION RATES

Pollutant	Significant Emission Rate (Tons Per Year)
Carbon monoxide	100
Nitrogen oxides	40
Sulfur dioxide	40
Ozone	40 VOC
Particulate matter	25
PM <sub>10</sub>	15
Total reduced sulfur (including H <sub>2</sub> S)	10
Reduced sulfur compounds (including H <sub>2</sub> S)	10
Sulfuric acid mist	7
Fluorides	3
Vinyl chloride	†
	(Pounds Per Year)
Lead	1200
Mercury	200
Asbestos	††
Beryllium	0.8
<u>Municipal waste combustor organics (measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans)</u>	(Megagrams per Year) 3.2 x 10 <sup>-6</sup> (Tons per Year) 3.5 x 10 <sup>-6</sup>
<u>Municipal waste combustor metals (measured as particulate matter)</u>	(Megagrams per Year) 14 (Tons per Year) 15
<u>Municipal waste combustor acid gases (measured as sulfur dioxide and hydrogen chloride)</u>	(Megagrams per Year) 36 (Tons per Year) 40
<u>Municipal solid waste landfill emissions (measured as nonmethane organic compounds)</u>	(Megagrams per Year) 45 (Tons per Year) 50

61G5-18.001 Who May Apply.

(1) Individuals desiring to be licensed as a cosmetologist shall meet all required qualifications as specified in §477.019, F.S.

(2) If an applicant for licensure by examination meets all required qualifications except the required minimum hours of training, he or she shall be entitled to take the licensure examination to practice cosmetology if the applicant has received a minimum of 1,000 hours of training established by the Board, and has been certified by the Director of the school or program in which he or she is currently enrolled to have achieved the minimum competency standards of performance as prescribed in Chapter 61G5-22, F.A.C. for the hours completed.

THE PERSON TO BE CONTACTED REGARDING THE PROPOSED RULE IS: Ed Broyles, Executive Director, Board of Cosmetology, Northwood Centre, 1940 N. Monroe Street, Tallahassee, Florida 32399-0750

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

Board of Funeral Directors and Embalmers

RULE NO.: 61G8-23.004  
 RULE TITLE: Direct Disposal Establishments

NOTICE OF ADDITIONAL PUBLIC HEARING

The Board of Funeral Directors and Embalmers hereby gives notice of an additional public hearing on the above-referenced rule to be held on February 16, 1998 at 1:00 p.m., at Radisson Riverwalk Hotel, 1515 Prudential Drive, Jacksonville, Florida 32207. The rule was originally published in Vol. 23, No. 40, of the October 3, 1997, Florida Administrative Weekly.

THE PERSON TO BE CONTACTED REGARDING THE PROPOSED RULE IS: Sue Foster, Executive Director, Board of Funeral Directors and Embalmers, Northwood Centre, 1940 N. Monroe Street, Tallahassee, Florida 32399-0750

Any person requiring a special accommodation at this hearing because of a disability or physical impairment should contact the Board's Executive Director at least five calendar days prior to the hearing. If you are hearing or speech impaired, please contact the Board office using the Florida Dual Party Relay System which can be reached at 1(800)955-8770 (Voice) and 1(800)955-8771 (TDD).

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

Board of Funeral Directors and Embalmers

RULE NO.: 61G8-32.002  
 RULE TITLE: Approved Courses

NOTICE OF WITHDRAWAL

NOTICE IS HEREBY GIVEN that the above rule, as noticed in Vol. 23, No. 33, of the Florida Administrative Weekly on August 15, 1997, has been withdrawn.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DOCKET NO.: 97-27R

RULE CHAPTER NO.: 62-210  
 RULE CHAPTER TITLE: Stationary Sources - General Requirements

RULE NOS.: 62-210.200  
 62-210.300  
 RULE TITLES: Definitions  
 Permits Required

NOTICE OF CHANGE

The Department has made a change to the proposed rule which appeared in the Florida Administrative Weekly, Vol. 23, No. 44, dated October 31, 1997, page 5910, so that the following sections will read as set forth below:

62-210.200 Definitions.

(244) "Regulatory Requirement" - Either (a) or (b), below, as applied to a facility that is not a Title V source or to any emissions unit within such facility.

(a) "Facility-Level Regulatory Requirement" - A requirement that may be applicable to any emissions unit or pollutant-emitting activity within a facility but which is not considered a unit-specific regulatory requirement, such as Facility-level regulatory requirements include the following:

5. Rule 62-296.320(4)(b), F.A.C., General Visible Emissions Standard, except Rule 62-296.320(4)(b)2., F.A.C.; and

6. Rule 62-296.320(4)(c), F.A.C., Unconfined Emissions of Particulate Matter, and:

7. Rule 62-4.160, F.A.C., except Rule 62-4.160(13), F.A.C.

Specific Authority 403.061 FS. Law Implemented 403.021, 403.031, 403.061, 403.087, F.S. History-Formerly 17-2.100; Amended 2-9-93, 11-28-93, Formerly 17-210.200, Amended 11-23-94, 4-18-95, 1-2-96, 3-13-96, 3-21-96, 8-15-96, 10-7-96, 10-15-96.

62-210.300 Permits Required.

(3)(b) i.e. In the case of a proposed new pollutant-emitting activity, such activity would not constitute a modification of any existing non-exempt emissions unit.

Specific Authority: 403.061 FS. Law Implemented: 403.021, 403.031, 403.061, 403.087 FS. History-Formerly 17-2.210; Amended 11-28-93; Formerly 17-210.300; Amended 11-23-94, 4-2-95, 4-18-95, 10-16-95, 1-2-96, 3-13-96, 3-21-96, 5-13-96, 8-15-96, 10-7-96.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DOCKET NO.: 97-28R

RULE NO.: 62-212.400  
 RULE TITLE: Prevention of Significant Deterioration

NOTICE OF CHANGE

The Department has made a change to the proposed rule which appeared in the Florida Administrative Weekly, Vol. 23, No. 44, dated October 31, 1997, page 5914, so that the following sections will read as set forth below:

62-212.400 Prevention of Significant Deterioration (PSD).

TABLE 212.400-2  
REGULATED AIR POLLUTANTS -  
SIGNIFICANT EMISSION RATES

Pollutant	Significant Emission Rate (Tons Per Year)
Carbon monoxide	100
Nitrogen oxides	40
Sulfur dioxide	40
Ozone	40 VOC
Particulate matter	25
PM <sub>10</sub>	15
Total reduced sulfur (including H <sub>2</sub> S)	10
Reduced sulfur compounds (including H <sub>2</sub> S)	10
Sulfuric acid mist	7
Fluorides	3
Lead	(Pounds Per Year) 1200
Mercury	200
Municipal waste combustor organics (measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans)	(Megagrams per Year) 3.2 x 10 <sup>-6</sup>
	(Tons per Year) 3.5 x 10 <sup>-6</sup>
Municipal waste combustor metals (measured as particulate matter)	(Megagrams per Year) 14
	(Tons per Year) 15
Municipal waste combustor acid gases (measured as sulfur dioxide and hydrogen chloride)	(Megagrams per Year) 36
	(Tons per Year) 40
Municipal solid waste landfill emissions (measured as nonmethane organic compounds)	(Megagrams per Year) 45
	(Tons per Year) 50

TABLE 212.400-3  
DE MINIMIS AMBIENT IMPACTS

Pollutant	Concentration (Micrograms Per Cubic Meter)	Averaging Period
Nitrogen dioxide	14	Annual
Lead	0.1	Quarterly
Sulfur dioxide	13	24-hour
PM <sub>10</sub>	10	24-hour
Fluorides	0.25	24-hour
Mercury	0.25	24-hour
Carbon monoxide	575	8-hour
Hydrogen sulfide	0.2	1-hour
Ozone	No de minimis air quality level is provided for ozone. However, any net increase of 100 tons per year or more of volatile organic compounds subject to preconstruction review would be required to perform an ambient impact analysis, including the gathering of ambient air quality data.	

Specific Authority 403.061 FS. Law Implemented 403.021, 403.031, 403.061, 403.067 FS. History-Formerly 17-2.500, Amended 2-2-93, Formerly 17-212.400, Amended 11-23-94, 1-1-96

DEPARTMENT OF HEALTH

Board of Clinical Social Work, Marriage and Family Therapy, and Mental Health Counselors

RULE NOS.:

RULE TITLES:

64B4-4.0021

Application and Examination Fee for Certification of Education and Subsequent Examination

64B4-4.015

Registered Intern Registration Fee and Subsequent Examination Fee

NOTICE OF ADDITIONAL PUBLIC HEARING

The Board of Clinical Social Work, Marriage and Family Therapy, and Mental Health Counselors hereby gives notice of an additional public hearing on the above-referenced rules to be held on January 31, 1998 at 9:00 a.m., at The DoubleTree Guest Suites/Busch Gardens, 11310 North 30th Street, Tampa,

ATTACHMENT C

MIAMI-DADE COUNTY, FLORIDA



May 14, 2001

RECEIVED

ENVIRONMENTAL RESOURCES MANAGEMENT  
AIR QUALITY MANAGEMENT DIVISION33 S.W. 2nd AVENUE  
SUITE 900

MIAMI, FLORIDA 33130-1540

TELEPHONE: (305) 372-6925

FAX: (305) 372-6954

MAY 16 2001

Ms Sharon DeHays  
Vice President of Cement Operations  
CSR Rinker Materials Corporation  
1200 NW 137 Avenue  
Miami, Florida 33182

BUREAU OF AIR REGULATION

Subject: Compliance test results for CSR Rinker located at near or in the vicinity of 1200 NW  
137 Avenue, Miami

Dear Ms. DeHays:

The Department has reviewed the results of the VOC and beryllium tests conducted at the above referenced facility and have the following concerns:

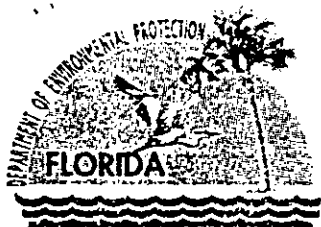
- The test results indicate a VOC concentration of 0.099 pounds per ton of clinker, nearly the permitted limit of 0.1 pounds per ton of clinker. In order to provide reasonable assurance of continuous compliance with the VOC limits set forth in the aforementioned permit, the Department is requesting that you submit to this office, a plan of action to address these concerns within 30 days of receipt of this letter. The plan of action shall include the method to be utilized to demonstrate continuous compliance, such as continuous emissions monitoring, and a timeline for implementation of the plan of action.
- The beryllium concentration during the test averaged 0.000135 pound per hour. Be advised that this concentration is in excess of the permitted limit of 0.000090 pounds per hour as set forth in permit # 02500614-002-AC, and is therefore a violation of a permit condition and must be corrected. Since beryllium emissions are no longer regulated by the rules of the Florida Department of Environmental Protection (FDEP), you must request a permit modification in order to correct said violation. This request shall be submitted to Mr. Alvaro Linero of the FDEP main office in Tallahassee.

If you have any questions on the above please call the Air Facilities Section at 305-372-6925.

Sincerely,

*Mallika Muthiah*  
Mallika Muthiah, P.E., Chief  
Air Facilities Section

ATTACHMENT D



Jeb Bush  
Governor

# Department of Environmental Protection

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

David B. Struhs  
Secretary

May 25, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Sharon DeHays  
Vice President of Cement Operations  
Rinker Materials Corporation  
1200 Northwest 137th Avenue  
Miami, Florida 33182

Re: DEP File No. 0250014-007-AC Modernization Project  
Letters Requesting Extension and Modification of permit

Dear Ms. DeHays:

This is to acknowledge receipt of Mr. Varn's letter dated May 24, 2001 requesting that the Department extend the time for taking final action until June 30, 2001. We acknowledge receipt of Dr. Koogler's April 6 and May 22, 2001 letters requesting several modifications of the permit conditions including removal of the Beryllium (Be) limits. We intend to consolidate any previous requests with the present into a single permitting action. Therefore, we are re-starting the permit processing clock.

Before we can finalize this permitting action, we need the following information:

- Beryllium calculations expressed as ug/dscm at 7 percent oxygen
- Response to DERM's letter of May 14, 2001

Although we are restarting the permitting clock, we need your prompt responses in order to close out these issues at the earliest possible date.

As previously discussed, we will be consolidating all requests on a single action that will need to be publicly noticed pursuant to Chapter 50, F.S. The additional requests make the waiver of the processing clock a moot matter.

If you have any questions regarding this matter, please contact me or Teresa Heron at 850/921-9529.

Sincerely,

A. A. Linero, P.E. Administrator  
New Source Review Section

AAL/th

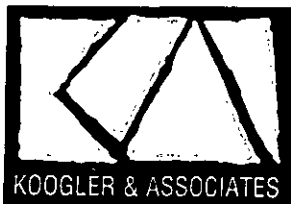
cc: Jack Varn, Fowler & White  
John Koogler, P.E., K&A  
Patrick Wong, Miami-Dade DERM

"More Protection, Less Process"

Printed on recycled paper.

ATTACHMENT E





**KOOGLER & ASSOCIATES**

**ENVIRONMENTAL SERVICES**  
4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

263-01-01  
April 6, 2001

Mr. John Reynolds  
Florida Department of  
Environmental Protection  
Division of Air Resources Management  
111 S. Magnolia Drive, Suite 23  
Tallahassee, Florida 32301

**Subject: CSR Rinker Materials Corporation  
Permit No 0250014-002-AC  
Comments on Department Suggested Permit Amendments  
and an Amendment to Change Basis of SO<sub>2</sub> and NO<sub>x</sub> Emission Limits**

Dear Mr. Reynolds:

Following are our comments on the Department suggested amendments to the above captioned permit issued to the CSR Rinker Materials Corporation (Rinker) for the construction and initial operation of a 3300 ton per day (clinker) Portland cement plant in Dade County, Florida. The Department amendments are those contained in the Draft Permit Amendment addressed to Sharon DeHays from Howard Rhodes dated March 15, 2001. Our most substantive comment is related to the proposal to install a VOC Continuous Emission Monitoring System (CEMS) to provide the Department with reasonable assurance that the VOC emission limit for the plant will be met on a continuing basis. We are offering an alternative procedure to provide the Department with reasonable assurance that the VOC emission limit can be met on a continuing basis, and are also addressing issues raised regarding clinker production rates. Rinker has no objection to the Department amendments related to alternative fuels.

In addition to the amendments suggested by the Department, Rinker is suggesting an amendment changing the units of measurement of the SO<sub>2</sub> and NO<sub>x</sub> emission limits (Table 1-2) from pounds per million BTU to pounds per ton of clinker. The maximum permitted emission rates of SO<sub>2</sub> and NO<sub>x</sub> will remain unchanged. The suggestion to change the units of measurement of these limits is to provide consistency and conformity with permit conditions developed by the Department for other like cement plants in the state..

**Alternative to VOC CEMS**

As an alternative to installing a CEMS to measure VOC emissions, Rinker proposes to establish a program of monitoring feed materials for hydrocarbon content.

VOC emission measurements have been conducted at the Rinker plant (December 21, 2000) demonstrating compliance with the VOC emission limiting standard. These tests, plus the VOC emission tests and in-process VOC measurements conducted at other dry process Portland cement plants using precalciner technology demonstrate that the pyro-processing system (the kiln and precalciner) is quite efficient at reducing hydrocarbon compounds in exhaust gases to trace levels. Other information provided to the Department has conclusively demonstrated that the majority of VOCs measured in the stack gas from the kiln system result from hydrocarbon compounds that are in the raw meal fed to the preheater. As the raw meal is heated (during its passage downward through the preheater), hydrocarbons in the raw meal are volatilized and appear as VOCs in the stack gas. Thus, as an alternative to the VOC CEMS and to provide the Department with reasonable

assurance that the VOC emission limiting standard will be met on a continuing basis, Rinker proposes the following:

1. Each order of feed material obtained from an off-site source (mill scale, flyash, etc.) will be tested upon receipt by Rinker for Total Recoverable Petroleum Hydrocarbons (TRPH) using the test method FL-PRO. Feed materials derived on-site (limestone, etc.) will be tested monthly for TRPH using the test method FL-PRO.
2. Additionally, Rinker will sample the blended preheater feed from the homogenizing silo on a daily basis, composite samples over a one week period, and analyze the weekly composited sample for TRPH using the FL-PRO test method. A record of all test results will be maintained by Rinker, and will be available to the Department and DERM for review.

This proposed condition requires Rinker to monitor individual feed materials as well as the blended material fed to the preheater on a regular basis for hydrocarbon products.

As information provided to the Department has demonstrated that hydrocarbon compounds in feed material are the predominant source of VOC emissions from dry process Portland cement plants, the monitoring plan proposed by Rinker will be adequate to provide the Department with reasonable assurance that abnormal levels of hydrocarbons are not present in the feed materials, and hence will not be present in the stack gas from the kiln system.

#### **Preheater Feed to Clinker Conversion Factor**

As we have discussed, the empirical factor Rinker uses to convert preheater feed to the clinker production (on a short term basis) is a divisor which will range from approximately 1.5 to 1.7. In other words, the preheater feed rate divided by this empirical factor will provide the most accurate short-term measure of clinker production available. For permitting purposes, Rinker used an average factor of 1.6; the permitted preheater feed rate of 220 tons per hour divided by 1.6 yields the permitted clinker production rate of 137 tons per hour.

As the empirical factor varies with variations in feed materials and fuel, changes in raw meal mix ratios and/or various operating parameters, Rinker determines the empirical factor on a periodic basis and calculates clinker production for the period as the preheater feed rate divided by this factor.

For compliance purposes, Rinker has no objection to providing the Department or DERM with the value of this empirical factor when they are providing notification of a scheduled compliance test. This factor will then be used to calculate clinker production rate as required in the compliance test report.

#### **Alternative Fuels**

Rinker does not object to the elimination of POTW sewage sludge as alternative fuels for the cement plant, nor to the elimination, at this time, of whole tires or tire derived fuel as alternative fuels. Rinker does, however, reserve the right to request an Amendment to the above captioned permit at a later date, directly from DERM, which will allow the use of whole tires and/or tire derived fuel as alternative fuels.

#### **SO<sub>2</sub> and NO<sub>x</sub> Emission Limits**

The SO<sub>2</sub> and NO<sub>x</sub> emission limiting standards for the kiln system (Table 1-2 of the above captioned permit) are listed as 0.7 and 1.53 pounds per mmbTU, respectively. Further, the maximum SO<sub>2</sub> and NO<sub>x</sub> emissions are limited to 306 pounds per hour (1340 tpy) and 671 pounds per hour (2940 tpy).



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respectively. Compliance with both of these emission limits is to be demonstrated by Continuous Emission Monitoring Systems (CEMS). It is our understanding that the basis for these emission limits (pounds per mmbTU) could be a general Dade County ordinance limiting sulfur dioxide emissions based on heat input and a RACT rule applicable to Dade County which limits NO<sub>x</sub> emissions based on heat input.

The convention within the cement industry is to limit SO<sub>2</sub> and NO<sub>x</sub> emissions (and other emissions) based on clinker production; i.e., a limit with units pounds per ton of clinker. This convention is even reflected in the above captioned permit in Specific Condition B.11 (page 9 of 17). This condition states:

Every day, the 24-hour average SO<sub>2</sub> and NO<sub>x</sub> emission rate for the previous day shall be calculated. Emissions shall be calculated in units of pounds per hour and pounds per ton of clinker...

The last paragraph in Specific Condition B.11 also states:

Mass emission rates (lb/hr, and lb/ton clinker) shall be calculated based on source specific and fuel specific F factors calculated using 40 CFR 60, Appendix A, Method 19. These F factors shall be recalculated when fuel properties vary significantly from those used in previously calculated F factors, but not less than once per year.

To make the SO<sub>2</sub> and NO<sub>x</sub> emission limits in the above captioned permit consistent with the intent of Specific Condition B.11 of the permit and consistent with the convention adopted by the Department for other like cement plants, it is requested that the units of measurement for the SO<sub>2</sub> and NO<sub>x</sub> emission limits in Table 1-2 be changed from pounds per million BTU to pounds per ton of clinker. It is also suggested that the last paragraph of Specific Condition B.11 be amended to eliminate any reference to F factors as Rinker has installed a Continuous Flow Rate Monitoring System (CFRMS) with data from this CFRMS being used to calculate mass emission rates. Because of the carbon dioxide generated during the production of Portland cement, the CFRMS is much more accurate for determining stack gas flow rate than the F factor.

To convert the units of measurement of the SO<sub>2</sub> and NO<sub>x</sub> emission limits, the following is suggested. The maximum permitted heat input rate to the plant (438 mmbTU per hour), the maximum clinker production rate (137 tons per hour) and the maximum SO<sub>2</sub> and NO<sub>x</sub> emission rates (306 pounds per hour and 671 pounds per hour, respectively), are all related in that they represent the maximum emissions expected at the maximum production rate and the maximum heat input rate.

If the maximum sulfur dioxide and nitrogen oxides emission rates (pounds per hour) are divided by the maximum permitted heat input rate of 438 mmbTU per hour, the presently permitted SO<sub>2</sub> and NO<sub>x</sub> emission limits of 0.7 and 1.53 pounds per mmbTU, are obtained. To convert the SO<sub>2</sub> and NO<sub>x</sub> emission limits to pounds per ton of clinker it is proposed that the maximum SO<sub>2</sub> emission rate (306 pounds per hour) be divided by the maximum permitted clinker production (137 tons per hour) to yield 2.23 pounds of SO<sub>2</sub> per ton of clinker. Similarly, for NO<sub>x</sub>, it is suggested that the maximum emission rate (671 pounds per hour) be divided by the maximum permitted clinker production rate (137 tons per hour) to yield 4.90 pounds of NO<sub>x</sub> per ton of clinker. If both of the proposed SO<sub>2</sub> and NO<sub>x</sub> emission limits (pounds per ton of clinker) are multiplied by the maximum annual permitted clinker production rate (1.2 million tons per year), the annual SO<sub>2</sub> and NO<sub>x</sub> emission caps contained in Table 1-2 (1340 tpy and 2940 tpy, respectively) are obtained; demonstrating the equivalency of the proposed emission limits with the permitted limits.

Mr. John Reynolds  
April 6, 2001

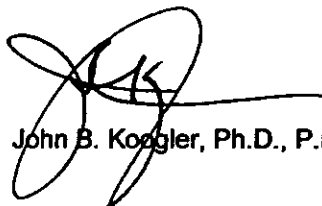
Page Four

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I appreciate your review and consideration of these comments. If our suggested alternative for VOC emission monitoring and our and our suggestion for the change in units of measurement for the SO<sub>2</sub> and NO<sub>x</sub> emission limits are acceptable, please provide written confirmation as soon as possible. If there are concerns regarding either proposed alternative, we would appreciate meeting with you at the earliest possible date, as we have discussed, so these matters can be resolved as expeditiously as possible.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK/jm

cc: Scott Benyon, CSR Rinker, West Palm Beach  
Mike Vardeman, CSR Rinker, Miami  
Jake Varn, Fowler & White



Sheet1

TO JOHN KLOOGER

FROM ADRIANA PEREZ

PAGES: 2

United States  
Environmental Protection  
Agency

Office of Water  
Engineering and Analysis Center  
Washington, DC 20460

EPA-823-R-01-004  
April 2001



**Method 1664:  
N-Hexane Extractable Material (HEM)  
and Silica Gel Treated N-Hexane  
Extractable Material (SGT-HEM)  
by Extraction and Gravimetry  
(Oil and Grease and Total Petroleum  
Hydrocarbons)**

ATTACHMENT F

5122101  
Nolan

March 15, 2001

**DRAFT**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Sharon DeHays  
Vice President of Cement Operations  
CSR Rinker Materials Corporation  
1200 Northwest 137th Avenue  
Miami, Florida 33182

Re: DEP File No. 0250014-002-AC  
Modernization Project/Permit Extension

Dear Ms. DeHays:

This is pursuant to your permit extension request dated September 7, 2000 as well as some remaining issues effecting changes to the construction permit. These changes relate to reasonable assurance provisions of the Department's rules and are predicated on the presumption that all physical construction required to make cement is complete and that initial stack testing is also complete. CSR Rinker has received a Title V operation permit from the Miami-Dade Department of Air Resources Management (DERM) including a compliance plan addressing the remaining requirements to be fulfilled and deadlines for completion of any remaining construction. The Title V permit will need to be revised to reflect these changes to the construction permit.

The Department met with CSR Rinker representatives on November 29 regarding the status of construction. It was agreed that CSR Rinker would not object to removal of authorization to burn tires at the facility since construction of the tire handling and feed system has not begun and it is unlikely that such a project could be completed within the time requested by CSR Rinker for this extension. The Department advised CSR Rinker that it may request a permit modification in the future directly from DERM.

CSR Rinker had previously agreed with DERM and the Department that sewage sludge will not be burned in the process. Therefore, authorization to burn sewage sludge has been removed from the permit.

Pursuant to the VOC test results submitted on February 28, 2001, the Department is adding a requirement for continuous monitoring of VOC emissions and a requirement for establishing the clinker production rate prior to conducting any emission tests. A continuous VOC monitor must be installed and operating by December 31, 2001. The test results show that the facility is very close to being non-compliant with the permit limit of 0.1 lb VOC/ton clinker. Rule 62-4.080, F.A.C., provides additional time for the facility to comply with new conditions that are necessary to provide reasonable assurance for compliance. Therefore, the expiration date is hereby extended to December 31, 2001 and the permit is otherwise modified as indicated below:

**B.5 Fuel Combustion**

- (1) Fuels fired in the pyroprocessing system (kiln and precalciner) shall not exceed a total heat input rate of 437 MMBtu/hr and shall consist only of:
  - a. Bituminous coal, natural gas, petroleum coke, propane, No. 2 fuel oil, residual fuel oil, on-specification and off-specification used oil.
  - b. ~~Whole tires and tire derived fuel (up to 40% total heat input) may be used as a supplemental fuel, but not as a start-up fuel.~~



- c. Combustion of non-hazardous solid waste, oil filters, booms and rags from spill clean up, generated on site. This non-hazardous solid waste material shall be used as supplemental fuel not as a start-up fuel.
- d. Combustion of non-hazardous solid waste (up to 10% of total heat input on a 24-hour basis) may be used as supplemental fuel: unused diapers, papers products, non-chlorinated plastic waste, ~~sewage sludge from publicly owned treatment works (POTW).~~ This non-hazardous solid waste material shall be not be used as a start-up fuel.
- e. ~~The combined percent heat input from tires, tire derived fuel and solid waste shall not exceed 40 percent of the total heat input from all fuels on a 24-hour basis.~~

*COAL AND PETROLEUM COKE*

- (2) The coal usage rate shall not exceed 16.8 TPH based on a 24-hour average. The petroleum coke usage rate shall not exceed 14.6 TPH on a 24 hour basis.

*~~TIRES SOLID WASTE~~*

- (3) ~~Whole tires and tire derived fuel along with the p~~Permitted non-hazardous solid waste material may be fed continuously at the kiln inlet at the base of the precalciner at a rate not to exceed ~~174.8~~ 44 MMBtu/hr (40 10% of total kiln and precalciner fuel input) on a 24-hour basis.
- (4) ~~Before initiating tire firing, the gases exiting the kiln shall reach a minimum temperature of 1400 degrees F for one hour and the oxygen level in the kiln, as measured at the cement plant induced draft fan, shall reach at least 3 percent (1-hour average). Upon reaching steady state conditions, and within 6 hours, gases exiting the kiln shall be maintained at an outlet temperature of at least 1750 degrees F.~~

- B.13 For emissions other than NO<sub>x</sub> and SO<sub>2</sub>, compliance with the allowable emission limiting standards listed in Table 1-2 shall be determined by using the following reference methods as described in 40 CFR 60, Appendix A (1996, version) and 40 CFR 61 Appendix B 1996, version) adopted by reference in Chapter 62-204, F.A.C.

- Method 5** Determination of Particulate Matter Emissions from Stationary Sources (I) and (A).
- Method 8** Determination of Sulfuric Acid Mist from Stationary Sources (I).
- Method 9** Visual Determination of the Opacity of Emissions from Stationary Sources (I) and (A).
- Method 10** Determination of Carbon Monoxide Emissions from Stationary Sources (I) and (A).
- Method 25 or 25A** Determination of Volatile Organic Compound Emissions from Stationary Sources (I) and (A).
- Method 29** Determination of Lead, Beryllium, and Mercury from Stationary Sources (I).

Emission testing shall be performed at the kiln/cooler main stack during a period when the kiln precalciner, cooler, raw mill and preheater are operating simultaneously and under normal operating conditions. EPA-reference methods for sampling pollutants shall be as specified in 40 CFR 60, Appendix A. Prior to any emission testing to demonstrate compliance with any emission limit, the permittee shall determine the clinker production rate for the test according to a factor based on the preheater/precalciner feed rate and notify the appropriate local compliance agency in advance of the commencement of any test(s). That rate of clinker production shall be used to determine compliance with all clinker-based emission limits in the permit for that test.

These emission units shall comply with all applicable requirements of Rule 62-297.310, F.A.C. General Test Requirements and 40 CFR 60.8. Performance Tests. Table 2-1, Compliance Requirements (attached) also lists the EPA methods.

Testing of emissions shall be conducted with the emission unit operating at capacity and under the different permitted fuels scenarios (petroleum coke, coal, on or off specification used oil, ~~TDF~~, solid waste, etc.) as specified in Specific Condition No.B.5. Fuel Combustion. The permittee shall provide DERM with a *protocol* that will outline the different fuel scenarios (% of total heat input)

that this unit will be burning. Rinker shall obtain the test data necessary to determine whether this kiln is capable of accommodating the burning of coal or petroleum coke and all of the other supplemental fuels specified on Specific Condition B.5. Fuel Combustion. The fuel scenarios tested shall represent the actual combustion percentage (% of total heat input) that is going to be maintained while burning supplemental fuels during normal operation. The frequency of testing shall be determined by DERM.

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 unit 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 unit is so limited, then operation at higher capacities is allowed for no more than fifteen consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C., and 40 CFR 60 Appendix A and 40 CFR 60.8, Subpart A].

~~B.20 In order to document compliance with Specific Condition No. B5(3) Tires:~~

- ~~(1) A log shall be established and maintained for the hours of operation using tires as supplemental fuel. The log shall include the daily tire usage (hours) as supplemental fuel at the facility, a monthly running total of the tire usage (hours), and a cumulative 12 month running total (hours), to ensure that the annual limit is not exceeded.~~
- ~~(2) A log shall be maintained that includes the date of all tire deliveries to the facility, and the total quantity (nearest 0.1 tons) of tires received.~~
- ~~(3) A tire usage control system shall be installed to assure that the tire usage as supplemental fuel at the facility does not exceed the maximum of 178.4 million Btu heat input to the kiln and precalciner or 6.7 tons per hour. The control system shall include a verification method and a log that insures and documents that the tires usage and heat input limits are not exceeded.~~
- ~~(4) A log for the utilization rate (tons per hour) of tires shall be maintained. The utilization rate of tires as supplemental fuel shall be determined by a continuous weighing method and shall be recorded.~~
- ~~(5) All logs shall be maintained on file for at least five (5) years and shall be made available to the Department upon request.~~

B.20 By December 31, 2001, permittee shall install, calibrate, maintain and operate a continuous emission monitoring system in the kiln/raw mill stack to measure and record the emissions of VOC from the kiln/raw mill. The CEM system shall be installed, certified, operated and maintained in accordance with Performance Specification 8A of Appendix B of 40 CFR 60. The CEM system shall include an oxygen monitor, which shall be installed, certified, operated and maintained in accordance with Performance Specification 3 of Appendix B of 40 CFR 60. The CEM system's data shall be quality assured using the procedures of Appendix F of 40 CFR 60. The owner or operator shall report no later than the 10th day following each calendar quarter a summary of the daily average VOC emissions reported by the CEMS system for the days of that calendar quarter to the Department's Northeast District Office. These results should be reported as ppm of propane corrected to 7 percent oxygen, pounds per hour of VOC as propane, and pounds of VOC as propane per ton of clinker. [Rule 62-4.070, F.A.C.]

B.26 This facility shall maintain a central file containing all measurements, records, and other data that are required to be collected pursuant to the various specific conditions of this permit. Operators shall keep a daily Operation and Maintenance log to include, at a minimum, the following information:

- The data collected from in-stack monitoring instruments
- The records on daily feed rates and clinker production rate

- The amount and type of fuel burned
- ~~Total quantity (by weight) of tires used as supplemental fuel~~
- ~~The firing rate of whole tires shall be quantified (weighed) continuously and recorded~~
- Calibration logs for all instruments
- Maintenance/repair logs for any work performed on equipment or instrument which is subject to this permit;
- Total coal, petroleum coke, natural gas, solid waste material, and oil usage.

All measurements, records, and any other data required to be maintained by CSR Rinker shall be retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These data shall be made available to the FDEP and to DERM upon request. DERM shall be notified in writing at least 15 days prior to the testing (auditing) of any instrument required to be operated by these specific conditions in order to allow witnessing by authorized personnel. [Rule 62-4.070(3), F.A.C.]

- B.27 The Permittee shall comply with Rules 62-701 and 62-711, F.A.C. All original submittals in response to this Specific Condition shall be submitted to:

~~Waste Tire Financial Coordinator  
Solid Waste Management Section  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400~~

Solid Waste Section  
Department of Environmental Protection  
Southeast District Office  
P O Box 15425  
West Palm Beach, Florida 33416

- B.28 ~~The maximum allowable number of waste tires stored on site at any time is 28,000. Only whole waste tires shall be stored on site.~~

- B.29 ~~No processed waste tires shall be stored or burned at this site at any time unless the permittee obtains a permit modification from the Department. Waste tires shall only be received in enclosed trailers from registered waste tire collectors who possess valid registrations pursuant to Rule 62-711, F.A.C.~~

- B.30 ~~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.~~

- B.31 ~~The Permittee shall document the number of tires burned during a week and then establish storage and inventory based on a typical weekly requirement. The Permittee shall keep all documentation concerning tire inventory at the site and make the information available for Department review during inspections.~~

In accordance with the Title V Compliance Plan, CSR Rinker must provide details to DERM regarding any system to introduce approved solid waste fuels into the pyroprocessing system prior to initiation of construction. The Title V Operation Permit requires completion of construction related to solid waste use by March 31, 2002.

A copy of this Permit Modification shall be attached to the referenced construction permit and shall become part of the permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within

Ms. Sharon DeHays

March 15, 2001

Page Six

fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Ms. Sharon DeHays  
March 15, 2001  
Page Six

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This Permit Amendment constitutes final agency action unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition that conforms to Rule 62-110.106, F.A.C. Upon timely filing of a petition or a request for an extension of time this Notice will not be effective until further Order of the Department.

If either a petition for administrative hearing or a request for extension of time is not timely filed with the Department, then this Permit Amendment shall constitute final agency action. Any party to this order would then have the right to seek judicial review pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000; and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice of appeal must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director  
Division of Air Resources  
Management

#### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Permit Amendment was sent by certified mail (\*) and copies were mailed by U.S. Mail before the close of business on \_\_\_\_\_ to the person(s) listed:

Sharon DeHays, CSR Rinker\*  
H. Patrick Wong, Miami-Dade DERM  
Steve Cullen, P.E., K&A

Clerk Stamp

**FILING AND ACKNOWLEDGMENT**  
**FILED**, on this date, pursuant to §120.52,  
Florida Statutes, with the designated Department  
Clerk, receipt of which is hereby acknowledged.

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

ATTACHMENT G

6. On or before March 1 of each calendar year, a completed DEP Form 62-210.900(5), Annual Operations Report Form for Air Pollutant Emitting Facility shall be submitted to the Department [Rule 62-210.370(3) F.A.C.]

7. Compliance Plan. This plan is for the following Emissions Units:

016	Raw Material Handling (Fugitive)
017	Raw Material Handling (Baghouses)
018	In-Line Kiln/Raw Mill and Clinker Cooler
019	Finish Mill System
020	Coal Mill System

**FAXED**  
6-4-01  
to Tim Atkinson

These emissions units are being constructed under the authority of Air Construction Permit, No. 0250014-002-AC dated September 11, 1997.

The existing wet process kilns were shut down permanently in accordance with provisions from the Rules for the Prevention of Significant Deterioration (PSD) that allowed the modernization project to net out of PSD Review and a determination of Best Available Control Technology (BACT).

The dry process kiln (Kiln #2) was operational before the date that this Compliance Plan was drafted (September 6, 2000). The new kiln has not yet achieved its maximum authorized production rate while using the typical conventional fuels. In September, 2000, Rinker plans to conduct the tests required by the applicable New Source Performance Standards under 40 CFR 60 using the conventional fuels for the new kiln including coal and used oil.

The NSPS tests may have to be conducted at less than design or permitted capacity. Also, by the test date, the company will not have completed all contemplated construction associated with use of authorized waste fuels, such as tires, etc. Additional on-going construction activities and testing will occur to insure that the manufacturer meets contract production guarantees. Thereafter, additional construction will occur to install and test systems to burn the additional waste fuels.

The following conditions clarify the scope of such activities that may continue following issuance of the Title V permit. These must be completed by March 2002, or Rinker must apply for a construction permit limited to the scope of such projects:

1. The permittee shall comply with all of the terms and conditions of air construction permit No. 0250014-002-AC dated September 11, 1997.
2. The permittee shall comply with all applicable terms and conditions of Consent Order OGC CASE No. 96-1751 dated September 5, 1996.
- ✓ 3. All construction activities authorized by Permit 0250014-002-AC and by this compliance plan shall be completed by March 31, 2002. Any additional construction (including continuance of construction) shall require an application and a public notice.
4. The permittee may conduct the following construction activities without obtaining any construction permits:

- a) Minor projects such as kiln duct reconfiguration to remedy problems associated with plugging within the pyro-processing system.
  - b) Installation of a bypass to reduce problematic recirculating streams, such as chlorides, provided that all permit conditions (especially fuel use, production, and emission limits) are met. The dust collected from the bypass shall be re-introduced into the process. Rinker shall provide details to DERM prior to initiation of construction of a bypass.
  - c) Install a tire or tire derived fuel introduction system. Rinker shall provide details for approval to DERM of the systems prior to the initiation of construction.
  - d) A system to introduce other approved waste fuels. Rinker shall provide details to DERM of the systems prior to the initiation of construction.
5. Performance testing shall be conducted in accordance with conditions 12 (d) of the Consent Order OGC CASE No. 96-1751 dated September 5, 1996.
  6. Per conditions 12 (d) of the Consent Order, the permittee shall submit the certification of completion of construction under a seal of a P.E. registered in the State of Florida.
  7. Per conditions 12 (d) of the Consent Order, the permittee shall submit a notification of the performance testing date within 14 days of submittal of the certificate of completion of construction; and, the performance test shall be conducted within 45 days of the submittal of the certificate of completion of construction, unless an alternative date is authorized by DERM.
  8. Compliance with the NOx standard shall be demonstrated by the applicable date established in condition 12(e) of the Consent Order.
  9. The performance test results shall be submitted no later than 45 days after the last sampling run of the test is completed in accordance with Rule 62-297-310(8), F.A.C.
  10. Once commercial product is being made with the new emissions units, referenced above, the existing emissions units, those whose contemporaneous emissions decreases were used in the evaluation and permitting of the above referenced emissions units, shall cease operation and, if there are any contemporaneous emissions still remaining, then the Title V permit shall recognize them for a period not to exceed 5 years from the date that the air construction permit, No. 0250014-002-AC, was issued/clerked.
  11. After each modification is accomplished, the P.E. of record shall submit a certificate of completion of construction, a notification of a performance testing date pursuant to Rule 62-297.310(7)(a)9., F.A.C., and the performance test results shall be submitted no later than 45 days after the last sampling run of the test is completed in accordance with Rule 62-297-310(8), F.A.C.
  12. The permittee is not permitted to operate the existing wet process kilns and the dry process kiln simultaneously for making commercial product.
  13. This permit does not authorize operation of kiln Nos. 1 and 2. They can not be reactivated without obtaining appropriate air construction permit(s).
  14. The permittee shall submit reports of the construction milestones on a quarterly basis.  
[Rules 62-213.440(2), 62-212.400(5), 62-212.400(7)(b), 62-213.420(1)(a)5. and 62-213.440(2), F.A.C.; 0250014-002-AC; and, Consent Order OGC CASE No. 96-1751]





**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**  
4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

June 13, 2001

Mallika Muthiah, P.E.  
Chief, Air Facilities Section  
Air Quality Management Division  
Environmental Resources Management  
Miami-Dade County  
33 SW 2<sup>nd</sup> Avenue, Suite 900  
Miami, Florida 33130-1540

**Subject:** Response to DERM's Letter Dated May 14, 2001

Dear Ms. Muthiah:

This letter responds to your letter of May 14, 2001. Two items were mentioned in your letter: Reasonable assurance of compliance with the VOC emission limit and beryllium emissions.

DERM's request for the first item, VOC compliance, follows:

*In order to provide reasonable assurance of continuous compliance with the VOC limits set forth in the aforementioned permit, the Department is requesting that you submit to this office, a plan of action to address these concerns within 30 days of receipt of this letter. The plan of action shall include the method to be utilized to demonstrate continuous compliance, such as continuous emissions monitoring, and a timeline for implementation of the plan of action.*

A VOC Monitoring Plan has been voluntarily prepared, and is attached to this letter.

DERM's request for the second item, beryllium emissions, follows:

*Since beryllium emissions are no longer regulated by the rules of the Florida Department of Environmental Protection (FDEP), you must request a permit modification in order to correct said violation. This request shall be submitted to Mr. Alvaro Linero of the FDEP main office in Tallahassee.*

The specified request was submitted to Mr. Linero on May 22, 2001 and a copy was sent to Frank Echanique of your staff (see copy attached).

Please contact me if you require further information.

Sincerely,

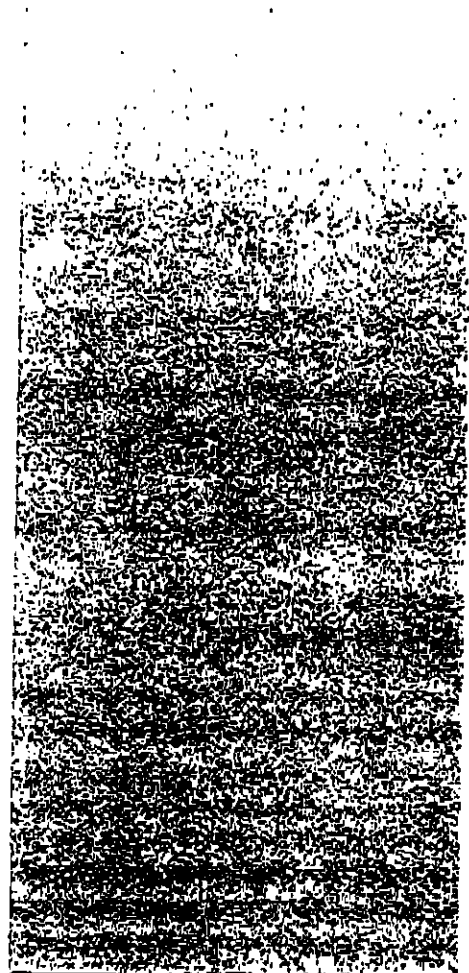
Steven C. Cullen, PE

# VOC Monitoring Plan

**CSR Rinker Materials Corp.  
Miami Cement Plant**

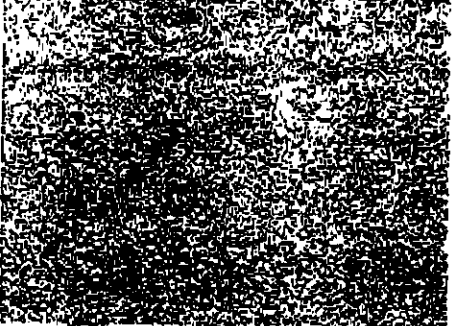


**June 2001**



**KOOGLER & ASSOCIATES  
ENVIRONMENTAL SERVICES**

**4014 NW THIRTEENTH STREET  
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RECEIVED TIME SEP. 14. 8:43AM

PRINT TIME SEP. 14. 8:47AM

VOC Monitoring Plan  
CSR Rinker Materials Corporation  
Miami Cement Plant

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**1.0 INTRODUCTION**

This VOC Monitoring Plan ("Plan") was prepared in response to the letter of May 14, 2001; from the Miami-Dade County Environmental Resources Management Air Facilities Section ("DERM") to Sharon DeHays, Vice President of Cement Operations for CSR Rinker Materials Corporation ("Rinker"). The letter discussed VOC compliance test results from sampling and analysis conducted on December 21, 2000, at the Miami Cement Plant.

DERM's letter requested the following action as related to the VOC compliance test results:

*In order to provide reasonable assurance of continuous compliance with the VOC limits set forth in the aforementioned permit, the Department is requesting that you submit to this office, a plan of action to address these concerns within 30 days of receipt of this letter. The plan of action shall include the method to be utilized to demonstrate continuous compliance, such as continuous emissions monitoring, and a timeline for implementation of the plan of action.*

This VOC Monitoring Plan has been voluntarily prepared in response to DERM's request.

**2.0 METHODS TO BE UTILIZED TO DEMONSTRATE COMPLIANCE**

VOC emission measurements conducted at the Rinker plant (December 21, 2000) demonstrated compliance with the permitted VOC emission limiting standard. These tests, plus the VOC emission tests and in-process VOC measurements conducted at other dry process Portland cement plants using precalciner technology demonstrate that the pyro-processing system (the kiln and precalciner) is quite efficient at reducing hydrocarbon compounds in exhaust gases to trace levels. Other information provided to the Department has conclusively demonstrated that the majority of the hydrocarbons measured in the stack gas from the kiln system result from hydrocarbon compounds that are in the raw meal fed to the preheater. As the raw meal is heated (during its passage downward through the preheater), hydrocarbons in the raw meal are volatilized and appear in the stack gas. Thus, to provide the Department with additional assurance that the VOC emission limiting standard will be met on a continuing basis, Rinker proposes to add the following two methods:

- Raw material sampling and analysis
- Emission testing

These additional monitoring methods, as described below, will provide further assurance (beyond that required by existing permit conditions) that anomalous levels of

hydrocarbons are not present in the raw/feed materials, and hence will not be present in the stack gas of the kiln system.

**2.1 Raw Material Sampling and Analysis**

Rinker proposes to establish a program of monitoring feed materials for hydrocarbon content for one year.

1. Each order of feed material obtained from an off-site source (mill scale, flyash, sand, and etc.) will be tested upon receipt by Rinker for Total Recoverable Petroleum Hydrocarbons (TRPH) using the test method FL-PRO. Feed materials derived on-site (limestone, etc.) will be tested monthly for TRPH using the test method FL-PRO.
2. Additionally, Rinker will sample the blended preheater feed from the homogenizing silo on a daily basis, composite samples over a one week period, and analyze the weekly composited sample for TRPH using the FL-PRO test method. A record of all test results will be maintained by Rinker, and will be available to DERM for review.

This method allows Rinker to monitor individual feed materials as well as the blended material fed to the preheater for hydrocarbons on a regular basis, and to take appropriate action should materials with anomalous levels of hydrocarbons be encountered.

**2.2 Emission Testing**

In order to provide assurance beyond reasonable assurance that the plant is operating in compliance with the applicable VOC permit limits, Rinker proposes to conduct quarterly emission testing for VOC for one year (four sampling events).

This testing is in addition to, and separate from emission testing required by permits or administrative regulations, except that one of the quarterly sampling events will be used to demonstrate annual VOC compliance in the Federal fiscal year beginning October 1, 2001.

As in the previous sampling, EPA Reference Test Method 25A (40CFR60, Appendix A) will be used for the quarterly VOC emission testing. Notification will be provided to DERM 14 days before any emission testing under this plan.

**3.0 TIMELINE FOR IMPLEMENTATION**

The raw material sampling can be implemented within 30 days after the Plan is approved. The first quarterly emission testing event can be conducted in September 2001.

A proposed schedule for implementation follows:

- July 1, 2001: Begin raw material sampling for per-order, weekly, and monthly samples
- September 15, 2001: First quarterly emission test event
- December 15, 2001: Second quarterly emission test event and annual compliance testing
- March 15, 2002: Third quarterly emission test event
- June 15, 2002: Fourth (final) quarterly emission test event
- June 30, 2002: Conclude raw material sampling

**4.0 PLAN CERTIFICATION**

I, the undersigned, am the responsible official as defined in Chapter 62-210.200, F.A.C., of the Title V source for which this VOC Monitoring Plan is being submitted. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made and data contained in this Compliance Plan are true, accurate, and complete.

Scott Benyon – Vice President  
CSR Rinker Materials Corporation  
1200 NW 137<sup>th</sup> Avenue  
Miami, Florida 33182

Date

Telephone: (305) 229-2951

Fax: (305) 229-8015