



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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263-00-09
March 7, 2001

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BUREAU OF AIR REGULATION

Mr. Ray Gorden
MIAMI-DADE COUNTY
ENVIRONMENTAL RESOURCES MANAGEMENT
Air Quality Management Division
33 S.W. 2nd Avenue, Suite 900
Miami, Florida 33130-1540

Subject: CRS Rinker Materials Corporation
Permit No. 0250014-002-AC and 0250014-003-AV
Comment on December 21, 2000 VOC Emission Measurements

Dear Mr. Gorden:

With reference to our recent telephone conversation, I am providing additional information to clarify our VOC, NO_x and CO Emission Measurement Report for the CRS Rinker Materials Corporation Portland Cement Plant dated December 21, 2000. In the report, we reported for the test period the plant production rate (a preheater feed rate of 185.4 tons per hour) the coal firing rate (11.6 tons per hour, or about 290 mm BTU/hr.) and the hourly average emission rates of VOC, NO_x and CO. All of the emission rates were below the maximum hourly emission rates established by the above-captioned Air Construction Permit.

The information that should have been included in our report was the clinker production rate for the test period so that the emission rates of VOC and CO could have been calculated in terms of pounds per ton of clinker. These emission rates (normalized to clinker production) could then have been compared with permitted emission rates based on clinker production.

During the test period (1600-2030 hours on December 21, 2000) the clinker production was determined by dividing the preheater feed rate by the empirical factor 1.55. This results in a clinker production rate for the test period of 119.6 tons per hour. It should be noted that the empirical factor for determining clinker production varies with the mix of raw materials fed to the kiln system. For permitting purposes, we used an average factor of 1.6. CRS Rinker has found that this factor can vary between about 1.5 and 1.7. Thus, the factor of 1.55 determined for the feed materials during the test period is a reasonably expected value.

The following table summarizes the VOC, NO_x and CO emission rates for the December 21, 2000 test period in terms of pounds per ton of clinker, or pounds per million BTU, and provides a comparison with permitted emission limits.

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Compound	Emission Rate		
	Units	Permit Limit	Test Rate
VOC	lb/ton clinker	0.1	0.099
NO _x	lb/mm BTU	1.53	1.11
CO	lb/ton clinker	3.01	0.98

These data demonstrate that the emission rates of VOC, NO_x and CO were not only below the maximum permitted hourly emission rates but were also below the emission rates normalized to clinker production or heat input.

If there are further questions regarding this matter, please do not hesitate to contact me at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:jhm

cc: Al Linero, FDEP, Tallahassee ✓
Mike Vardaman, CRS Rinker





FOWLER WHITE

ATTORNEYS AT LAW

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VIA U.S. MAIL AND TELECOPY

Mr. A.A. Linero, P.E.
Administrator
New Source Review Section
Florida Department of Environmental Protection
Twin Towers Office Building, MS 5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: DEP File No. 0250014-002-AC
CSR Rinker Materials Corporation
Miami Cement Plant
Modernization Project Permit Extension

Dear Mr. Linero:

We represent CSR Rinker Materials Corporation ("CSR"). CSR through their consultants, Koogler and Associates, filed a request with the Department to extend the expiration date on the referenced permit until March 31, 2002, to be consistent with the Compliance Plan of the Proposed Title V Permit No. 0250014-003-AV.

On November 30, 2000 and January 12, 2001, we filed requests to extend the Department's time for responding to CSR's request. The current extension expires on February 28, 2001. It is our understanding that the Department is in the process of revising the permit conditions and expects to complete the revisions either today or in the next couple of days. We would

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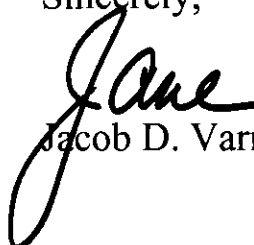
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appreciate having the opportunity to review the proposed revisions before the Department finalizes the revisions. Accordingly, we extend the time period until March 28, 2001 for the Department to take action on this matter.

We trust that you will deem this letter to be an adequate waiver. If it is not, please advise us immediately. Should you have any questions or care to discuss this matter, please call.

Sincerely,


Jacob D. Varn

cc: Steve Cullen
John Koogler
Mike Vardaman
Scott Benyon