



ENVIRONMENTAL RESOURCES MANAGEMENT
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July 25, 2001

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AUG 01 2001

BUREAU OF AIR REGULATION

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

Subject: Response Letter Dated June 13, 2001 from Steve C. Cullen Regarding proposed VOC Monitoring Plan at CSR Rinker located at near or in the vicinity of 1200 NW 137 Avenue, Miami
DERM's Letter Dated May 14, 2001

Dear Ms. DeHays:

The Department has reviewed the proposal for providing reasonable assurance of continuous compliance with VOC permit limits, included in Steve C. Cullen's letter of June 13, 2001. The VOC monitoring plan, included as an enclosure in Mr. Cullen's letter, proposes a sampling and analysis of the raw meal fed to the preheater in conjunction with quarterly emissions testing.

The raw meal fed to the preheater contains only the 'majority' of hydrocarbons, as stated in the submitted VOC monitoring plan, and not the total of hydrocarbon compounds that will be measured in the stack gas from the kiln system. It is DERM's assessment that because the initial test of stack emissions resulted in measurements extremely close to the permit limit, the proposal to analyze the 'majority' of the source of hydrocarbons is not sufficient in demonstrating continuous compliance with VOC permit limits. Additionally, quarterly emissions testing, in conjunction with or separate from the raw material sampling and analysis, is also not sufficient to provide reasonable assurance of compliance with VOC permit limits.

The Department requests that you submit an alternative plan of action to address these concerns within 30 days of receipt of this letter. If you have any questions on the above please call me at (305) 372-6925.

Sincerely,

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

Copy: Steve C. Cullen, P.E., Koogler & Associates
Alvaro Linero, Florida Department of Environmental Protection