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September 20, 2001

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BUREAU OF AIR REGULATION

Mallika Muthiah
Chief, Air Facilities Section
Air Quality Management Division
Metropolitan Dade County
Environmental Resources Management
33 S.W. 2nd Avenue, Suite 900
Miami, Florida 33130-1540

Subject: *CSR Rinker Materials Corporation*
Miami Cement Plant
VOC Monitoring Plan

Dear Mallika:

This letter is in response to your letter of July 25, 2001 to Sharon DeHays of CSR Rinker Materials Corporation (Rinker) and will confirm our telephone conversation of September 6, 2001. I would like to begin by apologizing for the time that it has taken to prepare this response, however, there were several issues we needed to discuss with Rinker prior to settling on the VOC plan described herein.

There are three issues, all related to VOC emission monitoring, that I will discuss herein:

- The VOC emission monitoring requirements of permits 0250014-002-AC and 0250014-003-AV;
- The VOC Monitoring Plan transmitted to you under copy of Steve Cullen's letter dated June 13, 2001;
- Future PSD review for VOCs.

Permitted VOC Emission Monitoring Requirements

Regarding continuing reasonable assurance of compliance with the permitted VOC emission limit, it should be noted that both the above-referenced air construction permit and the above-reference Title V air operating permit state:

“VOC emissions shall be tested initially to comply with the conditions of this permit. Thereafter, compliance [with the VOC emission limiting standard] will be assumed provided the CO allowable emission rate is reached.” (Emphasis added.)

Thus, the permit requires only an initial VOC compliance test. If the permittee passes that test the compliance requirement switches to the CO-surrogate compliance standard for VOCs.

On December 21, 2000, emission measurements were conducted at Rinker demonstrating compliance with the permitted VOC emission limit for the kiln system. Therefore, in accordance with permit conditions, Rinker is to demonstrate continuing compliance with the VOC emission limiting standard only by demonstrating continuing compliance with the CO emission limiting standard. In view of permit requirements, the VOC monitoring plan which Rinker voluntarily offered under cover of Mr. Cullen’s letter to you dated July 13, 2001 goes well beyond what the permit actually contemplates and requires for providing reasonable assurance of VOC compliance.

Proposed VOC Monitoring Plan

The monitoring plan outlined by Rinker under cover of Mr. Cullen’s letter of June 13, 2001 was in specific response to your letter of May 14, 2001 requiring that Rinker submit a plan “to provide reasonable assurance of continuous compliance with the VOC limits” within 30 days of receipt of your May 14, 2001 letter. Considering the afore-referenced permit condition which establishes reasonable assurance of compliance with the VOC emission limit, the plan voluntarily offered by Rinker is a very generous show of good faith to provide the Departments additional comfort and assurance that the permitted VOC emission limit is complied with on a continuing basis.

The one specific comment I would like to make regarding the proposed VOC Monitoring Plan and your letter of July 25, 2001 to Sharon DeHays regarding that plan, is related to the terminology “majority of the hydrocarbons measured in the stack gas.” This terminology was used in our proposed VOC Monitoring Plan in the context that the hydrocarbon material contained in the raw meal fed to the preheater represented the majority of the hydrocarbons which are measured in the stack gas from the kiln system. Your letter of July 25, 2001 stated that measuring only the “majority” of hydrocarbons was not sufficient to demonstrate continuing compliance with the VOC emission limit as the VOC compliance test data provided by Rinker showed the measured VOC emission rate to be close to the permitted VOC emission limit. We disagree but understand how

you may have misconstrued the information we provided. To clarify this matter, I would like to expand on our use of the term, "majority."

As pointed out in Section 2.0 of our proposed VOC Monitoring Plan, VOC emission tests and in-process VOC measurements conducted at other dry process Portland cement plants by Koogler & Associates, in addition to the VOC emission measurements made at Rinker, were used as a basis for our proposed plan. What these measurements showed was that the VOC concentration in the gas stream exiting the kiln and precalciner (measured at the base of the preheater) was non-detectable. These measurements demonstrated that the pyroprocessing system (kiln and precalciner) of a dry process Portland cement plant is extremely effective in combusting "virtually all" of the hydrocarbon materials in that system. Hydrocarbon measurements which were made at the top of the preheater tower and in the stack exhausting the kiln system showed varying amounts of hydrocarbons, depending upon test conditions. This being the case, our proposed VOC Monitoring Plan should probably have stated that our experience has demonstrated that "all measurable hydrocarbons" in the stack gas from the kiln system result from hydrocarbon compounds that are in the raw meal fed to the preheater. Such a statement would have better quantified our results and removed the ambiguity that you read into the test plan.

With the clarification that the measurable hydrocarbons found in the stack gas from the kiln system result from hydrocarbon material in the raw meal and the permit requirement for providing reasonable assurance of VOC compliance, it is our firm opinion that the proposed VOC Monitoring Plan is adequate to provide the required reasonable assurance and furthermore, goes well beyond what is required or even contemplated by permit.

Future PSD Review for VOCs

Rinker has discussed an amendment to the permitted annual VOC emission cap with the FDEP Division of Air Resources Management (DARM) in Tallahassee. Specifically, these discussions were with Mr. C.H. Fancy and Mr. A.A. Linero.

The discussion involved a possible increase in the annual VOC emission cap for the Miami cement plant from 60 tons per year to 72 tons per year. This is equivalent to increasing the short-term VOC emission rate from 0.10 pounds per ton of clinker to 0.12 pounds per ton of clinker. The 0.12 pounds of VOC per ton of clinker emission limit is consistent with VOC emission limits approved by FDEP for other recently permitted dry process Portland cement plants in Florida.

The reason for requesting the increase in the annual VOC emission cap as well as the short-term VOC emission limit is to provide Rinker with more flexibility in raw material sourcing; particularly with respect to reused materials, and to bring the operating limits in line with the requirements of other recently permitted Florida cement plants.

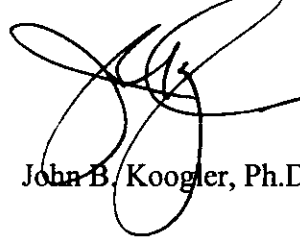
The VOC emission increase of 12 tons per year which Rinker is requesting, while not environmentally significant, will trigger a PSD review. The application for the air construction permit will be prepared and submitted to DARM within the next 30 days. The application will include the usual process description, review of control technology, air quality review and an assessment of secondary impacts. I would expect that during the review process, the Department will also readdress compliance assurance monitoring for VOCs. This assurance monitoring could include the use of a surrogate compound to demonstrate VOC compliance (such as in the current permit), the monitoring of feed material (as our proposed plan offers), or other alternatives.

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I hope the information provided herein adequately addresses your concerns regarding VOC emission compliance at the Rinker Miami Cement Plant. If you have further questions, please do not hesitate to contact me at 352-377-5822 or jkoogler@kooglerassociates.com.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK/jm

cc: Clair Fancy, FDEP Tallahassee
Al Linero, FDEP Tallahassee
Scott Benyon, CSR Rinker
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