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Division of Air
Resources Management

October 23, 1991



Rinker Materials

Rinker Materials Corporation
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Miami, FL 33182

P.O. Box 650679
Miami, FL 33265-0679

Facsimile (305) 223-5403
Telephone (305) 221-7645

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Mr. Claire Fancy
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RE: Stone Dryer Modification Permit No.: AC 13-187599

After speaking with Willard Hanks and further reviewing the specific conditions in the final determination and permit to construct with Ron Hawks and Bill Voshell the following conditions are reviewed for problems as changed.

Specific Condition #3. Construction Requirement

The state policy mandates a 95% minimum on destruction capability for VOC's. This condition has been changed to require a 98.8% capability. We can find no reason for this change and request it be returned to 95%. Although the unit being constructed will destroy VOC's greater than 95%, the permit should not reflect more than the required policy limit.

Specific Condition #10. Operation Requirements

FAC 17-775 specifies the way soils shall be received and stored prior to final processing. No requirement for plastic sheets covering these materials is made in this rule. The facility currently being constructed will meet the requirements as specified in FAC 17-775. It is a roofed enclosure with three walls, leachate collection and impermeable floor. Rinker should not be required to place plastic over these materials when in this facility. The areas where this is required is at a job site or some exposed area.

Specific Condition #17

The soils immediately leaving the dryer are more than 600 degrees fahrenheit and will go into stainless steel sampling cans until cool. The protocol for this sampling was required in FAC 17-775 to demonstrate the soils meet clean fill standards. As stated glass jars would break when the materials coming out of the dryer are placed in them.



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**RETURN RECEIPT
REQUESTED**

*Fold at line over top of envelope to the right
of the return address*

CERTIFIED

P 328 309 201

MAIL



FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
Mr. Claire Fancy
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

October 23, 1991
Mr. Claire Fancy
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Specific Condition #28

The conversion of the dryer includes the ability to operate at varying tonnages to enable more highly contaminated soils to be appropriately decontaminated and the VOC's destroyed concurrently. Rinker's intention has always been to operate at tonnages or temperatures necessary to decontaminate the soils and destroy the VOC's Rinker would have to get FDER approval to operate at a lower rate as this condition is written.

Specific Condition #32

Due to the variety of delays in permitting for Rinker's Materials Substitution operations at State and County level Rinker is by separate letter requesting an extension of this permit until June 15, 1992 to complete construction and start-up.

If there are questions or comments please contact me at 1-305-221-7645. Thank you for your help in this matter.

Very truly yours,



Michael D. Vardeman
Manager Materials Substitution

MDV:lg

cc: W. Hanks
S. Brooks, SE Dist
P. Wong, DERM



Rinker Materials

CSIMILE

**TRANSMISSION
CEMENT DIVISION OFFICE**

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TO: *Willard Hankins*

DATE: *10/14/91*

LOCATION: *FDER
TALLAHASSEE*

FROM: *MP Hankins*

FAX NUMBER

NO. OF PAGES: *2*
(Including this page)

904-922-6973

Letter with comments to follow

- for notes purpose only.

10-14-91

Mike V. said he had problems with some of the specific conditions, including requiring 98.8% destruction efficiency. Told him to request ext. in time to file for hearing and send letter describing problems.

MPH



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October 14, 1991

State of Florida
Department of Environmental Regulation
Att: C.H. Fancy, P.E., Chief Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Sir:

This letter is follow up for discussions with Willard Hanks on October 10, 1991 of your section in reference to questions Rinker has regarding changes in the Notice of Permit DER File No. AC13-187599.

Mr. Hanks wanted time to review the issues in question.

Your assistance in this matter is appreciated.

Very truly yours,

Michael D. Vardeman
Manager Material Substitution

MDV:lg