



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

December 27, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James S. Jenkins III
Rinker Materials Corporation
Post Office Box 650679
Miami, Florida 33265-0679

Dear Mr. Jenkins:

Re: File No. AC 13-187599, Rock Dryer Modification

The Department has reviewed Mr. William Voshell's November 28, 1990, letter that provided additional information which had been requested on the proposed modification of your stone dryer. We are requesting clarification of the contemporaneous emission change calculations (question No. 2 of our Nov. 1 letter). Actual emission calculations must be based on actual operation parameters (production, hours of operation, etc.). Your historic emission estimates (Attachment F) were based on continuous operation (8,760 hrs/yr) of the stone dryer at its permitted production rate (25 TPH). We suspect that the unit did not operate continuously at its permitted rate. Please recalculate your contemporaneous emission changes using actual emissions as defined in the regulations (F.A.C. Rule 17-2.100(3)). If the calculations show a significant emissions increase of any pollutant (Table 500-2 of Chapter 17-2, F.A.C.), you will need to submit the additional data required by F.A.C. Rule 17-2.500 to confirm that the project will comply with the Prevention of Significant Deterioration regulations.

We will resume processing the application after the requested information is received. If you have any questions on this matter, please write to me or call Willard Hanks at 904-488-1344.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/WH/plm

c: I. Goldman, SE Dist.
P. Wong, DERM
W. Voshell, Rinker

III.B.4. CREDITABLE AMOUNT

As mentioned above, only contemporaneous and creditable emissions changes are considered in determining the source-wide net emissions change. All contemporaneous and creditable emissions increases and decreases at the source must, however, be considered. The amount of each contemporaneous and creditable emissions increase or decrease involves determining old and new actual annual emissions levels for each affected emission unit.

The following basic criteria should be used when quantifying the increase or decrease:

- ▶ For proposed new units which have not begun normal operations, the potential to emit must be used to determine the increase from the units.
- ▶ For an existing unit, actual emissions just prior to either a physical or operational change are based on the lower of the actual or allowable emissions levels. This "old" emissions level equals the average rate (in tons per year) at which the unit actually emitted the pollutant during the 2-year period just prior to the change which resulted in the emissions increase. These emissions are calculated using the actual hours of operation, capacity, fuel combusted and other parameters which affected the unit's emissions over the 2-year averaging period. In certain limited circumstances, where sufficient representative operating data do not exist to determine historic actual emissions and the reviewing agency has reason to believe that the source is operating at or near its allowable emissions level, the reviewing agency may presume that source-specific allowable emissions [or a fraction thereof] are equivalent to (and therefore are used in place of) actual emissions at the unit. For determining the difference in emissions from the change at the unit, emissions after the change are the potential to emit from the units.
- ▶ A source cannot receive emission reduction credit for reducing any portion of actual emissions which resulted because the source was operating out of compliance.
- ▶ An emissions decrease cannot be credited from a unit that has not been constructed or operated.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to:
 Mr. James S. Jenkins III
 Rinker Materials Corp.
 P.O. Box 650679
 Miami, FL 33265-0679

4. Article Number
 P 407 852 907

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
 X *James S. Jenkins III*

6. Signature - Agent
 X

7. Date of Delivery
 JAN - 4 1991

8. Addressee's Address (ONLY if requested and fee paid)

PS Form 3811, Apr. 1989 *U.S.G.P.O. 1989-238-815 DOMESTIC RETURN RECEIPT

P 407 852 907
 RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Sent to
 Mr. James S. Jenkins, Rinker
 Street and No.
 P. O. Box 650679 Materials
 P.O., State and ZIP Code
 Miami, FL 33265-0679

Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date
 Mailed: 1-2-91
 Permit: AC 13-187599

U.S.G.P.O. 1989-234-585
 PS Form 3800, June 1985