



Department of Environmental Protection

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Twin Towers Office Building
 2600 Blair Stone Road
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May 5, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James S. Jenkins, III
 Vice President of Cement Operations
 Rinker Materials Corporation
 1200 Northwest 137th Avenue
 Miami, Florida 33182

Re: DRAFT Permit Modification No. 0250014-006-AC
 Modernization Project. Revisions of Permit Conditions

Dear Mr. Jenkins:

We received a letter dated April 10 from your consultant, Koogler and Associates, specifying the rationale for 11 issues or changes in the draft permit modification. We subsequently met with Mr. Steve Cullen, P.E., of Koogler and Associates and Mr. Mike Vardamen, representing Rinker Materials Corporation (RMC). Based on our review of the letter and our discussions at the meeting, we have the following comments and information requirements:

1. References to the emission guideline applicable to municipal waste combustors will be removed because of the exemption of cement kilns from the regulation.
2. A Public Notice of Intent to Issue will be published by RMC. Objections from the public are limited to only the modifications of the permit, but not the construction of the project as presently permitted.
3. Dade County DERM, who attended the meeting by teleconference, has taken the position that their rules apply to the burning of solid waste materials by resource recycling and management facilities in wellfield protection areas. RMC will work directly with DERM to sort out those issues. In this regard, the addition of permit conditions regarding certain off-site generated wastes (e.g. oil spill wastes, oil filters) is subject to challenge by DERM or the public. Obviously some kind of agreement between DERM and RMC for burning the described wastes needs to be reached apart from this permitting action.
4. We requested a more precise description of where and how the various wastes will be introduced within the pyroprocessing operation and provided your representatives with examples on how they should be presented.
5. It was agreed that sewage sludge will not be processed. Although there are some benefits to introducing this material into the process, there are some potential downsides. These include increased recirculations of various metals within the kiln, potential mild odors, and possible need for increased fan capacity.

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PS Form 3800 April 1995		0250014-006-AC	

Mr. James S. Jenkins, III
May 5, 1998
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6. It was pointed out by the Department that the permitted level of heat input from tires (40 percent) appears high. Our review of various references, reveals that the practical limit is approximately 25-30 percent as a maximum. Based on EPA and State of California documents on tire and tire-derived fuel burning as well as our discussions with industry experts, we suggest that 25 percent is a more reasonable and supportable limit. We therefore request your concurrence in lowering the heat input limit from tires accordingly. Please submit the total weight (tons/hr) of tires.
7. It was agreed that the kiln temperature requirement while burning tires will be deleted with the understanding that tires and tire derived fuel will not be introduced via the precalciner so that it may act somewhat as an afterburner. A protocol describing how and where tires will be introduced and the temperature needed for good combustion should be provided by RMC.
8. It was agreed that in any case, the amount of heat input from wastes that can be characterized as solid waste needs to be limited to less than 30 percent by weight rather than by heat input. This is to insure that the kiln cannot be characterized as a municipal waste combustor per Section 129 of the Clean Air Act. Please submit the total weight (ton/hr) of the plant's fuel stream.
9. Estimates of the expected amount of waste from each category need to be provided. For example, neither RMC nor the Department would actually expect a stream of 30 percent unused diapers to be burned in the kiln. We have supplied Koogler and Associates with examples of permit conditions for combusting similar segregated wastes at resource recovery facilities.
10. Regarding Comment No. 6 contained in the April 10 letter from Koogler and Associates, please provide the kiln's emission characteristics of a shutdown and malfunction and explain the type of malfunction that will be excluded from the daily average. Regarding this comment, the Department has previously negotiated this CEMs requirement with another cement plant and agreed to the condition as written in Rinker's permit. Please refer to the attached December 13, 1996 letter from RTP Environmental Associates Inc. Please be advised that Florida Crushed Stone is also permitted to construct a dry process cement kiln with preheater and precalciner.

The application is incomplete per our discussion with your representatives. We understand that RMC will meet with DERM to resolve any outstanding local issues. If you have any questions regarding this matter, please contact Ms. Teresa Heron at (850)921-9529 or Mr. Joe Kahn at (850)921-9519.

Sincerely,



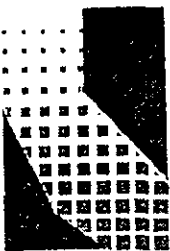
A. A. Linero, P.E. Administrator
New Source Review Section

AAL/aal

cc: Patrick Wong, DERM
Isadore Goldman, DEP
Bob Johns, DERM
Mike Vardeman, RMC
Steve Cullen, P.E., Koogler and Associates

TIRES AS A FUEL SUPPLEMENT: FEASIBILITY STUDY

Report to the Legislature
January 1992



CALIFORNIA INTEGRATED WASTE MANAGEMENT BOARD

**BURNING TIRES FOR FUEL AND TIRE PYROLYSIS:
AIR IMPLICATIONS**

CONTROL TECHNOLOGY CENTER

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U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

Air and Energy Engineering Research Laboratory
Office of Research and Development
U.S. Environmental Protection Agency
Research Triangle Park, NC 27711

December 1991



RTP ENVIRONMENTAL ASSOCIATES INC.®

AIR • WATER • SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East
Green Brook, New Jersey 08812-1909

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DEC 15 1996

BUREAU OF
AIR REGULATION

December 13, 1996

Mr. Clair H. Fancy, P.E.
Bureau of Air Regulation
Florida Dept. of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

We appreciate the Department's efforts in reviewing our application and preparing a draft permit. After careful review, Florida Crushed Stone (FCS) has the following comments on the draft air permit for a second kiln at their Brooksville facility:

- (1) As noted in the application, FCS is requesting authority to construct either a gepol tower (previously permitted) or a precalciner kiln (subject of this draft permit). We request that the permit be worded to allow construction of either kiln to begin within 18 months of the effective date of this permit. This could be accomplished by a minor modification of the original permit (i.e., extending its date) or incorporating the original gepol tower permit into the new precalciner permit.
- (2) The expiration date of this construction permit, November 30, 1998 (i.e., less than two years), is insufficient to allow for construction and shakedown of the proposed facility prior to applying for the operating permit. Therefore, we request that the expiration date be set at five years from the effective date of the final permit.
- (3) Permit condition II.2.2(b) on page 5 is much more restrictive than requirements in the previous permit for the gepol tower kiln. Specifically, the applicant requests that the third through fifth bullet items be deleted. First, the permit application already specifies which materials will be stored in enclosed structures/silos. Also, determination of which materials required special storage was based on 10% moisture content in the previous permit application, not 14% as specified in the draft permit. Second, alignment of the coal pile with the predominant wind direction may not be possible given operational restrictions in the coal handling

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area. Third, the requirement for revegetating haul roads and other disturbed areas is burdensome and may be interpreted to apply to mining operations. In summary, annual visible emission testing is being required as part of this permit for minor and fugitive PM sources, which will ensure that visible emissions are controlled to the degree necessary. Further, FCS maintains an ambient monitoring network that includes particulate monitoring as a further check on particulate emissions and impacts.

- (4) Permit condition III.B11 on page 14 is much more restrictive than requirements in the previous permit for the gepol tower kiln. In the previous permit, production and feed rates were to be calculated and recorded daily, which is reflected in current condition III.B7. It is impractical, if not impossible, to calculate and record hourly production and feed rates. Even if it were somehow possible, the production and feed rates could not be calculated on a real-time basis for use by CEM systems.

Also, the requirement to calculate 24-hour rolling-hourly CEM averages is burdensome and not necessary. As written, we interpret the permit for the gepol tower kiln to require compliance with 24-hour limits to be based on daily block averages consistent with the requirement for production and feed rates to be recorded daily. Most existing permits with CEM requirements or new federal directives require that compliance with 24-hour permit limits based on CEM data be calculated as daily (i.e., block) rather than 24-hour running averages. For example, the recent Emission Guidelines/New Source Performance Standards (EG/NSPS) for municipal waste combustors (MWCs) at 40 CFR Subparts Cb and Eb require compliance based on CEM data to be determined with the daily (i.e., block) averaged geometric mean of hourly arithmetic mean concentrations, which are even less stringent than daily (i.e., block) averaged arithmetic mean averages.

Finally, this condition requires that startup be limited to 2 hours without notifying the Department. As noted in our May 10, 1995 responses for the previous permit, startup from cold conditions can take up to 24 hours (a large amount of time is necessary to heat the large thermal mass of the kiln). Thus, every cold startup would require notification and potentially prior Department approval. We believe that the language in the draft permit is a misinterpretation of FAC 62-210.700, which limits the duration of excess emissions due to startup, shutdown, and malfunctions to two hours in a 24 hour period. During startup and shutdown, emissions will be less than permit limits given in lb/hour values. However, since no feed stock is introduced or clinker produced during the initial warmup phases of a startup, permit limits given in lb/ton are meaningless. We suggest that this condition be reworded as follows:

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- (6) On Table 2-1, please change the required test method for beryllium to Method 29 from Method 104. Thus, compliance with the beryllium emission limit can be determined during the same multi-metals test as required for mercury and lead in order to simplify the initial stack tests procedures and minimize testing costs.
- (7) Permit condition III.C5 on pages 20 and 21 notes that Department establishes a visible emission limitation of 5% opacity in lieu of particulate stack tests. Like specific condition 13 in the gepol tower permit, it should be explicitly stated that visible emissions in excess of 5% opacity are not permit violations, but only require that particulate stack tests be performed.
- (8) Permit condition III.C10(c) on pages 21 and 22 specifies an opacity limit for coal handling equipment and fugitive emissions from coal storage piles, etc. to less than 5% except when adding, moving, or removing coal (during which opacity shall be no more than 20%). To maintain consistency with opacity limits for other fugitive emissions, FCS requests that the "less than 5% opacity" be changed to "10% opacity or less" and revise the entry in the opacity column of Table 1-1 for coal handling and storage fugitive emissions accordingly (i.e., from "5/20/10" to "20/10").

If you have any questions or need any additional information, please feel free to contact either Bryan Adkins of Florida Crushed Stone at 352-799-7881 or myself at 908-968-9600.

Sincerely,

RTP ENVIRONMENTAL ASSOCIATES, INC.®

Donald F. Elias/wec

Donald F. Elias
Principal

DFE/WEC/wec

cc: A. Linero, T. Heron, C. Holladay, H. Oven/FDEP
B. Adkins, C. Allen/FCS
L. Curtin, Esq./Holland & Knight
M. Hober, W. Corbin, M. Lewis, FCS3 Project File/RTP

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