



# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

December 31, 1996

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

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

Re: Rinker Materials Corporation, Miami Cement Plant  
File No. 0250014-002-AC

Dear Mr. Jenkins:

The Department received your application for the modernization of the existing cement plant in Miami, Dade County, Florida on December 4, 1996. Based on a technical review, the application is incomplete. Pursuant to Rules 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., please submit the following information, including all assumptions, reference materials and calculations:

## GENERAL

1. Pursuant to Rule 62-212.400 (2)(e), F.A.C., please recalculate the net emission increases (sum of all 5 year contemporaneous creditable increases and decreases in the actual emissions of the facility) for all affected PSD pollutants listed in Table 62-212.400-2, F.A.C., to determine PSD applicability.
2. Pursuant to Rule 62-212.400(2)(d)4.(ii), F.A.C., if the facility to be modified is within 10 km of a Class I area and if the proposed modification results in a net emission increase (as set forth in Rule 62-212.400 (2) (e)1., F.A.C.) of any pollutant regulated under the Act, which increase would have an impact on the affected *Class I area* equal to or greater than 1.0 microgram per cubic meter (24-hour average), this modification shall be subject to the preconstruction review requirements of the PSD regulations. Calculate the impact of any emission increase on the Everglades National Park.
3. Does this facility comply with the Dade County air pollution control regulations?

## EMISSION UNIT NO. 1

4. Explain the proposed reasonable precautions taken to minimize proposed fugitive emissions from unpaved roads (357.43 TPY(actual) vs. 31.91 TPY (proposed)). Please refer to Appendix 2 of application.
5. Estimate fugitive emissions from emission unit No. 1, Raw Materials Handling, (unloading of produced and purchased materials from truck and conveyor systems)
6. What are the components (metals, halogens, PCBs) of the waste soil listed in page 20 of the application ?
7. Provide documentation to ensure that materials proposed for use in the industrial process are non-hazardous.

8. Submit a detailed analysis of the components of all feedstreams. Indicate the precise mix proportion for the raw mill feed.

PROCESS EVALUATION AND EMISSION UNIT NO. 2

9. Provide a manufacturer's certification that will confirm that the maximum design capacity of the kiln is 220 tons per hour of dry kiln feed.
10. Please state the different operating rates that this facility will be use.
11. What is the "dry kiln feed rate" (40 CFR 60, Subpart F ) and the "dry preheater feed".
12. Explain how the fuels listed on pages 47 through 54 are going to be used (start up, main, supplementary or emergency fuels) and the proposed annual heat input usage (20%, 40 % , etc.) . If these fuels have been permitted before, list the permit number and state the specific condition that restricted fuel usage (rate, sulfur content, etc.).
13. Provide reasonable assurance that the emissions of hazardous air pollutants (HAPs) will decrease. Refer to Page 1 of the REPORT.
14. Estimate the net increase or decrease pursuant to Rule 62-212.400 (2)(e), F.A.C., for the non-criteria PSD pollutants (lead, mercury, beryllium, etc.) in tons per year. Show basis of calculations. No calculations were provided for the pollutants (VOC, HAPs, H106, PB, H017, and H150) mentioned on page 14 of the application.
15. Submit any existing data for all other HAPs pollutants that have been tested at this facility in the past five years. Include dates, baseline conditions, production rates, and fuel burned.
16. Estimate fugitive emissions s from petroleum storage activities.
17. Are the proposed emissions based on the worst case scenario? What is the worst case scenario?
18. Low pollutants rates are more typical a dry process kilns with a preheater and a precalciner. However, the proposed emission rates do not reflect the efficiency of this dry process. Please reevaluate your proposal and submit a more realistic pollutant emission rates that will reflect the efficiency of the proposed dry process.
19. Provide a detailed process flow diagram of the facility.
20. Describe good combustion practices that will be used to minimize NOx, CO and VOC emissions.
21. Submit a detailed analysis of specifications and quantities of the different fuels to be burned at each combustion source at this facility. Discuss any blending of fuel types.
22. Describe how captured dust from the baghouse (kiln) is removed and disposed from the system (CKD handling system equipment). What precautions are used to minimize unconfined emissions while handling the dust?
23. Describe procedures used to startup and shutdown of the process equipment to minimize excess emissions.

CONTROL EQUIPMENT AND EMISSIONS UNITS 3 AND 4

24. It is not clear from the description of the project if the baghouses to be used in the modernized plant are part of the existing operation. Are the baghouses described in page 24 of the application new ?

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25. Are the proposed baghouses' particulate matter emissions calculated using a 0.01 gr/dscf emission rate (refer to last page of application)? Calculate the flow (dscfm) for each baghouse. Show any estimates used in these calculations. Specify, if possible, the stack location in the process flow diagram.
26. Emissions from proposed baghouses do not relate to that provided for plant components.
27. Submit design specifications for the kiln and cooler stack transmissometers.
28. The detailed description of the control equipment (page 70 of the application) was not included. Include a detailed engineering design specification of the control devices (baghouses) used at this facility. Please include for each baghouse, as a minimum, the following information:
  - Design Emission rate for particulate matter (before and after proposed controls)
  - Baghouse operation temperature (F) range
  - Number of separate baghouses
  - Number of isolated compartments per baghouses
  - Design criteria for air to cloth ratio or range of acceptable ratios
  - Cloth description
  - Type of bag cleaning under consideration and subsequent cleaning controls
  - Strategy for detecting and replacing faulty bags
  - Description of ash handling and disposal system
  - Nature and terms of performance guarantee

We will resume processing the application after the requested information is received. If you have any questions regarding this matter, please call Teresa Heron (Review Engineer) or Cleve Holladay (Meteorologist) at (904) 488-1344.

Sincerely,



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

AAL/th/t

cc: John Koogler, PE  
Brian Beals, EPA  
John Bunyak, NPS  
Ewart L. Anderson, DERM  
Joe Kahn, SED

P 265 659 123

7/98

no green card

US Postal Service

**Receipt for Certified Mail**

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Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees		\$
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		0250014-002-AC

PS Form 3800, April 1995

METROPOLITAN DADE COUNTY, FLORIDA



Department of Environmental Resources Management  
33 S.W. 2nd Avenue  
Miami, FL. 33130-1540

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**SEND TO:**

Name: *Ms. TERESA HEARD*

Company/Department: *FDEP*

Phone Number:

Fax Number: *904-922-6979*

Message:

*Ms. TERESA HEARD:*

*ATTACHED RELOCATION COMMENTS*

*THANKS*

*EVO*

**FROM:**

Name: *EVA KUWATH*

Division/Section: *AIR QUALITY MANAGEMENT DIVISION*

Phone Number: *(305) 372-6952*

Fax Number: *(305) 372-6954*

Date: *DECEMBER 18, 1996*

Number of Pages (including this one): *2*

# Memorandum

DATE: December 18, 1996  
TO: Teresa Heron, Air Permitting Engineer  
FROM: Ewart L. Anderson, P.E. *For Eva Karath*  
RE: Rinker Materials Corporation, Miami Cement Plant

As per your request we are providing the following comments on Rinker Materials Corporation application for a Miami Cement Plant located at 1200 NW 137th Avenue, Miami, Florida 33182.

- 1) Emission from proposed baghouses does not relate to that provided for plant components.
- 2) On page 61 there is mention of OGC Case No. 96-1751 we are not able to comment because there is no copy of the document.
- 3) No calculations are provided for pollutants mentioned on page 14 for the following: VOC, HAPS, H106, H017, PB and H150.
- 4) PSD review should take into consideration that plant is located within 10 kilometers of a Class 1 area.
- 5) Plant is a baseline source based on its proposed construction after incept of PSD rules.
- 6) Provide documentation and operational procedures to ensure that materials proposed for use in the industrial process are non-hazardous.