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FEB 23 1996

Tallahassee
BUREAU OF
AIR REGULATION

February 22, 1996

Mr. James Pennington, P.E.
Administrator, Compliance and Enforcement
Division of Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road
MS 5505
Tallahassee, FL 32399-2400

Re: Rinker Materials Consent Order

Dear Jim:

Here are the emissions figures that we have been promising to provide regarding nitrogen oxide (NOx) emissions at CSR-Rinker Materials' Miami cement plant. I apologize for our delay in getting this information to the Department.

We calculate that current emissions of NOx from the existing direct-fired, wet process kilns (fired at oxygen levels of approximately 2.5 per cent) average approximately 4700 tons per year (tpy). This average is based on normal operations, upset, and hard burning conditions. In light of this historic experience, we would propose an interim emissions limitation for the plant of 3.6 lbs. of NOx per MMBTU based on a 30 day rolling average. This interim limitation would be applicable during the time between the execution of the consent order and the inauguration of the selected alternative for plant modification. With careful attention to best operating practices, we believe that the plant's actual NOx emissions can be kept below this interim "not-to-exceed" limitation.

As to what emissions could be expected in the event the existing kilns are converted from direct to indirect firing, we believe it is reasonable to project that indirect firing could reduce annual NOx emissions approximately 40-45 per cent compared to historic levels. Such a reduction would result in emissions within the range of 1.9-2.0 lbs. of Nox per MMBTU, calculated on a 30 day rolling average basis. This range of emissions, however, could only be achieved with the fitting of new, more

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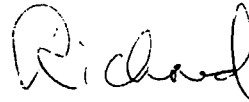
efficient burners and burner controls capable of maintaining oxygen levels at between 1.5 and 2.0 per cent.

Finally, as to what emission levels could be achieved by modernizing the facility utilizing an indirect-fired, dry process system with preheater and precalciner, we expect that it may be possible to achieve a greater reduction in NOx emissions than would result from adopting the indirect firing option. Because the average NOx emission rate that would be achieved by such a conversion would vary rather widely depending upon the design and performance parameters implemented in a reconstruction, we can only offer a preliminary estimate that the system would have an emission rate less than 2.0 lbs. per MMBTU. The final NOx emission rate would have to be determined by permit when the design of the new system is finalized.

We hope this information demonstrates that the approach we have proposed in our draft consent order will allow substantial reductions in long-term NOx emissions from Rinker's Miami plant. We appreciate the Department's willingness to entertain our phased approach and its recognition that substantial capital investment is needed by Rinker to achieve reductions of the magnitude we are contemplating.

Please call me if there are any questions concerning this letter. We look forward to execution of the consent order as soon as practicable.

Sincerely,



Richard T. Donelan
Attorney for Rinker Materials

cc: Mike Vardeman
Scott Benyon