



November 6, 1995

Mr. A. A. Linero, P.E.
Administrator, New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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BUREAU OF
AIR REGULATION

Re: Tarmac Florida, Inc.
Slag Dryer
AC13-273887; PSD-FL-230

Dear Mr. Linero:

Tarmac Florida, Inc. was recently issued the above referenced air construction permit for a slag dryer. Specific Condition 15 of the permit requires that Tarmac submit a test plan and methodology for establishing the PM/PM10 emission limit for the slag dryer. The plan is to be submitted to the Department within 15 days after issuance of the permit (i.e., by November 12, 1995). Source testing is to be completed within 60 days after acceptance of a test plan by the Department. The permittee is to submit the test report and results to the Department within 45 days of completion of the source tests. The Department will revise the PM/PM10 emission limits, if appropriate, based upon the test plan and source test data.

The purpose of this correspondence is to present the proposed test plan and methodology for establishing the PM/PM10 emission limit for the slag dryer:

PROPOSED TEST PLAN AND METHODOLOGY FOR PM/PM10

1. TEST PLAN

- A. A series of three (3) particulate matter (PM) tests will be conducted on the outlet of the slag dryer baghouse. Each test will be conducted approximately 60 days apart, with the first test being conducted at the middle of November 1995, the second around the middle of January 1996, and the third around the middle of March 1996. This interval testing will provide test results reflecting variability in raw materials and climatic conditions, and thereby provide a more representative sample set.
- B. Each test will consist of three (3) individual test runs for PM. The test runs will be performed using EPA Method 5. Concurrent visible emissions test will be conducted along with the PM tests. The data set upon which to base a PM/PM10 emission limit will therefore consist of a total of nine (9) individual test runs for PM and visible emissions.

2. METHODOLOGY FOR ESTABLISHING PM/PM10 EMISSION LIMIT

The PM test data will be summarized in tabular form for evaluation. The average, standard deviation, and 95 percent confidence interval will be calculated based on the nine test runs. The 95 percent confidence interval will be used as a guideline in proposing a PM/PM10 emission limit. Other factors will also be considered in recommending the emission limit, i.e., variability of data, representativeness

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of data, process conditions, and climatic conditions. Tarmac will submit the recommended PM/PM10 emission limit to the Department for consideration.

The above plan as proposed will require an amendment of Specific Condition 15 to allow source testing to be completed within 180 days of issuance of the permit. We feel this is necessary to obtain a representative data set which reflects varying raw material characteristics and climatic conditions. However, this will not affect the permit expiration date of July 1, 1996.

Thank you for consideration of this plan, and please call if you have any questions concerning this information. We look forward to receiving written confirmation of the acceptability of the test plan.

Sincerely,

David A. Buff

David A. Buff, P.E.
Florida P.E. #19011

DB/arz

cc: Al Townsend
Scott Quass
Jim Alves
File (2)

*cc: Dade Co.
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