



October 19, 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

RECEIVED
OCT 23 1995
BUREAU OF
AIR REGULATION

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

Dear Mr. Linero:

The purpose of this correspondence is to present additional comments to the Department regarding the Technical Evaluation and Preliminary Determination (TE&PD) dated September 13, 1995, concerning the above referenced air construction permit for Tarmac Florida, Inc. These comments are in response to further conversations with the Department's air permitting engineer (Willard Hanks) concerning KBN's comment letter dated October 6, 1995.

Best Available Control Technology Evaluation

In our previous comment letter, concern was expressed over the uncertainty of meeting the Department's proposed BACT PM emission limit of 0.02 gr/dscf, primarily on the basis of a lack of any available comparative data from an operating slag dryer. Based on these concerns, it was requested that the BACT determination and PM emission limit be reworded to allow the BACT to be revised if the initial stack testing indicates that an 0.02 gr/dscf outlet grain loading is not achievable. The Department may be agreeable to testing to set the BACT emission limit, provided the Department signs off on the test plan and methodology for setting the limit. Suggested wording to this affect is provided below in the specific conditions.

Specific Condition 5

Concern was expressed over the Department's proposed visible emission limit of 5 percent opacity for the slag dryer. Tarmac requested a visible emission limit of 10 percent opacity. This would allow a slight visible emission during normal operation. This requested limit and the wording of Specific Condition 5 to allow setting the BACT emission limit through testing is provided below:

The particulate matter emissions (total PM and PM10) from the baghouse serving the slag dryer shall not exceed 0.04 gr/dscf, 4.1 lbs/hr, and 6.15 TPY. The visible emissions from the baghouse shall not exceed 10 percent opacity. Based on source testing following initial startup of the slag dryer, these emission limits may be revised downwards. The permittee shall submit a test plan and methodology for establishing a BACT emission limit to the Department within 15 days after issuance of this permit. Source testing shall be completed within 60 days after acceptance of a test plan by the Department. The permittee shall submit the test report and results to the Department within 45 days of completion of the

15007A/5

KBN ENGINEERING AND APPLIED SCIENCES, INC.

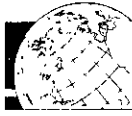
6241 Northwest 23rd Street,
Suite 500
Gainesville, Florida 32553-1500
904-336-5600 FAX 904-336-6603

5405 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
407-994-9910
FAX 407-994-9393

7785 Baymeadows Way,
Suite 105
Jacksonville, Florida 32256
904-739-5600 FAX 904-739-7777

1616 "P" Street N.W., Suite 350
Washington, D.C. 20036
202-462-1100
FAX 202-462-2270



source tests. The Department will revise the PM/PM10 emission limits, if appropriate, based upon the test plan and source test data.

Specific Condition 7

In the application, the PM emissions for the No. 4 Finish Mill was stated as 0.01 gr/acf. This should be reflected in Specific Condition 7. The draft permit specifies an emission limit of 0.02 gr/dscf, which would result in mass emissions greater than 2.57 lb/hr, as shown below:

$$30,000 \text{ acfm @ } 90^{\circ}\text{F and 5 percent moisture} = 27,360 \text{ dscfm}$$

$$27,360 \text{ dscfm} \times 0.02 \text{ gr/dscf} / 7000 \text{ gr/lb} \times 60 \text{ min/hr} = 4.69 \text{ lb/hr}$$

Therefore, please revise Specific Condition 7 to read "0.01 gr/acf."

Specific Condition 8

Tarmac previously submitted revised wording for this condition in order to clarify the methods for fugitive dust control. Based on our further discussions with the Department, the following wording is offered:

8. Unconfined PM emissions from the slag storage and handling shall be minimized by applying the following reasonable precautions:
 - A. Paved parking and traffic areas shall be well maintained and kept free of particulate matter build-up. Power washers and/or vacuum type sweeper(s) shall be used to clean the paved areas. Sweeper(s) shall be maintained and operated such that visible emissions from the sweeper(s) do not exceed 5 percent opacity.
 - B [no change]
 - C. [no change]
 - D. Wind breaks, enclosures or covers shall be used to control unconfined PM emissions from handling the dried slag in the slag storage area.

Specific Condition 9

Although the current visible emission limit for Cement Storage Silos 1-9 is 20 percent, Tarmac is willing to voluntarily accept a 5 percent opacity limit for Silos 1-9. This limit will insure that the baghouses serving the silos are well operated and maintained.

Specific Condition 15

Consistent with our previous requested, it is requested that in accordance with Rule 62-297.620(4), the annual compliance tests for PM be waived if visible emissions from the slag dryer do not exceed 5 percent opacity.

Mr. A. A. Linero, P.E.

Page 3

October 19, 1995



Thank you for consideration of these comments, and please call if you have any questions concerning this information. We look forward to receiving the final construction permit for the slag dryer in the near future.

Sincerely,

David A. Buff

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

S E A L

DB/ej

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

cc: W. Hanks, BAR
D. Knowles, SED
NPS
EPA
E. Anderson, DERM



xtra

RECEIVED
OCT 23 1995
BUREAU OF
AIR REGULATION

October 19, 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

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

Dear Mr. Linero:

The purpose of this correspondence is to present additional comments to the Department regarding the Technical Evaluation and Preliminary Determination (TE&PD) dated September 13, 1995, concerning the above referenced air construction permit for Tarmac Florida, Inc. These comments are in response to further conversations with the Department's air permitting engineer (Willard Hanks) concerning KBN's comment letter dated October 6, 1995.

Best Available Control Technology Evaluation

In our previous comment letter, concern was expressed over the uncertainty of meeting the Department's proposed BACT PM emission limit of 0.02 gr/dscf, primarily on the basis of a lack of any available comparative data from an operating slag dryer. Based on these concerns, it was requested that the BACT determination and PM emission limit be reworded to allow the BACT to be revised if the initial stack testing indicates that an 0.02 gr/dscf outlet grain loading is not achievable. The Department may be agreeable to testing to set the BACT emission limit, provided the Department signs off on the test plan and methodology for setting the limit. Suggested wording to this affect is provided below in the specific conditions.

Specific Condition 5

Concern was expressed over the Department's proposed visible emission limit of 5 percent opacity for the slag dryer. Tarmac requested a visible emission limit of 10 percent opacity. This would allow a slight visible emission during normal operation. This requested limit and the wording of Specific Condition 5 to allow setting the BACT emission limit through testing is provided below:

The particulate matter emissions (total PM and PM10) from the baghouse serving the slag dryer shall not exceed 0.04 gr/dscf, 4.1 lbs/hr, and 6.15 TPY. The visible emissions from the baghouse shall not exceed 10 percent opacity. Based on source testing following initial startup of the slag dryer, these emission limits may be revised downwards. The permittee shall submit a test plan and methodology for establishing a BACT emission limit to the Department within 15 days after issuance of this permit. Source testing shall be completed within 60 days after acceptance of a test plan by the Department. The permittee shall submit the test report and results to the Department within 45 days of completion of the

15007A/5

KBN ENGINEERING AND APPLIED SCIENCES, INC.

6241 Northwest 39th Street,
Suite 500
Gainesville, Florida 32653-1500
904-336-5600 FAX 904-336-6608

5-05 First Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1715

1-01 First Moor Road, Suite 105
Boca Raton, Florida 33487
407-994-8010
FAX 407-994-8892

7755 Bernardino Way,
Suite 105
Jacksonville, Florida 32256
904-739-3900 FAX 904-739-7777

1815 W Street N.W., Suite 500
Washington, D.C. 20036
202-462-1100
FAX 202-462-3200



source tests. The Department will revise the PM/PM10 emission limits, if appropriate, based upon the test plan and source test data.

Specific Condition 7

In the application, the PM emissions for the No. 4 Finish Mill was stated as 0.01 gr/acf. This should be reflected in Specific Condition 7. The draft permit specifies an emission limit of 0.02 gr/dscf, which would result in mass emissions greater than 2.57 lb/hr, as shown below:

$$30,000 \text{ acfm @ } 90^{\circ}\text{F and 5 percent moisture} = 27,360 \text{ dscfm}$$

$$27,360 \text{ dscfm} \times 0.02 \text{ gr/dscf} / 7000 \text{ gr/lb} \times 60 \text{ min/hr} = 4.69 \text{ lb/hr}$$

Therefore, please revise Specific Condition 7 to read "0.01 gr/acf."

Specific Condition 8

Tarmac previously submitted revised wording for this condition in order to clarify the methods for fugitive dust control. Based on our further discussions with the Department, the following wording is offered:

8. Unconfined PM emissions from the slag storage and handling shall be minimized by applying the following reasonable precautions:
 - A. Paved parking and traffic areas shall be well maintained and kept free of particulate matter build-up. Power washers and/or vacuum type sweeper(s) shall be used to clean the paved areas. Sweeper(s) shall be maintained and operated such that visible emissions from the sweeper(s) do not exceed 5 percent opacity.
 - B. [no change]
 - C. [no change]
 - D. Wind breaks, enclosures or covers shall be used to control unconfined PM emissions from handling the dried slag in the slag storage area.

Specific Condition 9

Although the current visible emission limit for Cement Storage Silos 1-9 is 20 percent, Tarmac is willing to voluntarily accept a 5 percent opacity limit for Silos 1-9. This limit will insure that the baghouses serving the silos are well operated and maintained.

Specific Condition 15

Consistent with our previous requested, it is requested that in accordance with Rule 62-297.620(4), the annual compliance tests for PM be waived if visible emissions from the slag dryer do not exceed 5 percent opacity.



Thank you for consideration of these comments, and please call if you have any questions concerning this information. We look forward to receiving the final construction permit for the slag dryer in the near future.

Sincerely,

David A. Buff

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

S E A L

DB/ej

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

cc: W. Hanko, BAR
D. Knowles, SED
NPS
EPA
E. Anderson, DERM



October 19, 1995

extra
Rec'd 10/23

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

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

Dear Mr. Linero:

The purpose of this correspondence is to present additional comments to the Department regarding the Technical Evaluation and Preliminary Determination (TE&PD) dated September 13, 1995, concerning the above referenced air construction permit for Tarmac Florida, Inc. These comments are in response to further conversations with the Department's air permitting engineer (Willard Hanks) concerning KBN's comment letter dated October 6, 1995.

Best Available Control Technology Evaluation

In our previous comment letter, concern was expressed over the uncertainty of meeting the Department's proposed BACT PM emission limit of 0.02 gr/dscf, primarily on the basis of a lack of any available comparative data from an operating slag dryer. Based on these concerns, it was requested that the BACT determination and PM emission limit be reworded to allow the BACT to be revised if the initial stack testing indicates that an 0.02 gr/dscf outlet grain loading is not achievable. The Department may be agreeable to testing to set the BACT emission limit, provided the Department signs off on the test plan and methodology for setting the limit. Suggested wording to this affect is provided below in the specific conditions.

Specific Condition 5

Concern was expressed over the Department's proposed visible emission limit of 5 percent opacity for the slag dryer. Tarmac requested a visible emission limit of 10 percent opacity. This would allow a slight visible emission during normal operation. This requested limit and the wording of Specific Condition 5 to allow setting the BACT emission limit through testing is provided below:

The particulate matter emissions (total PM and PM10) from the baghouse serving the slag dryer shall not exceed 0.04 gr/dscf, 4.1 lbs/hr, and 6.15 TPY. The visible emissions from the baghouse shall not exceed 10 percent opacity. Based on source testing following initial startup of the slag dryer, these emission limits may be revised downwards. The permittee shall submit a test plan and methodology for establishing a BACT emission limit to the Department within 15 days after issuance of this permit. Source testing shall be completed within 60 days after acceptance of a test plan by the Department. The permittee shall submit the test report and results to the Department within 45 days of completion of the

15007A/5

KBN ENGINEERING AND APPLIED SCIENCES, INC.

5241 Northwest 23rd Street,
Suite 500
Gainesville, Florida 32608-1100
800-335-5500 FAX 904-335-5500

1000 West Cypress Street,
Suite 211
Tallahassee, Florida 32302
904-291-1716 FAX 904-291-1716

1801 Clark Moore Road, Suite 105
Boca Raton, Florida 33437
107-99-19610
FAX 407-991-9883

7755 Bismarckway, Suite 105
Jacksonville, Florida 32255
904-738-5500 FAX 904-738-7777

1515 P Street N.W., Suite 350
Washington, D.C. 20035
202-462-1100
FAX 202-462-2270



source tests. The Department will revise the PM/PM10 emission limits, if appropriate, based upon the test plan and source test data.

Specific Condition 7

In the application, the PM emissions for the No. 4 Finish Mill was stated as 0.01 gr/acf. This should be reflected in Specific Condition 7. The draft permit specifies an emission limit of 0.02 gr/dscf, which would result in mass emissions greater than 2.57 lb/hr, as shown below:

$$30,000 \text{ acfm @ } 90^{\circ}\text{F and 5 percent moisture} = 27,360 \text{ dscfm}$$

$$27,360 \text{ dscfm} \times 0.02 \text{ gr/dscf} / 7000 \text{ gr/lb} \times 60 \text{ min/hr} = 4.69 \text{ lb/hr}$$

Therefore, please revise Specific Condition 7 to read "0.01 gr/acf."

Specific Condition 8

Tarmac previously submitted revised wording for this condition in order to clarify the methods for fugitive dust control. Based on our further discussions with the Department, the following wording is offered:

8. Unconfined PM emissions from the slag storage and handling shall be minimized by applying the following reasonable precautions:
 - A. Paved parking and traffic areas shall be well maintained and kept free of particulate matter build-up. Power washers and/or vacuum type sweeper(s) shall be used to clean the paved areas. Sweeper(s) shall be maintained and operated such that visible emissions from the sweeper(s) do not exceed 5 percent opacity.
 - B. [no change]
 - C. [no change]
 - D. Wind breaks, enclosures or covers shall be used to control unconfined PM emissions from handling the dried slag in the slag storage area.

Specific Condition 9

Although the current visible emission limit for Cement Storage Silos 1-9 is 20 percent, Tarmac is willing to voluntarily accept a 5 percent opacity limit for Silos 1-9. This limit will insure that the baghouses serving the silos are well operated and maintained.

Specific Condition 15

Consistent with our previous requested, it is requested that in accordance with Rule 62-297.620(4), the annual compliance tests for PM be waived if visible emissions from the slag dryer do not exceed 5 percent opacity.

Mr. A. A. Linero, P.E.

Page 3

October 19, 1995



Thank you for consideration of these comments, and please call if you have any questions concerning this information. We look forward to receiving the final construction permit for the slag dryer in the near future.

Sincerely,

David A. Buff

David A. Buff, P.E.

Florida P. E. #19011

S E A L

DB/ej

cc: Al Townsend

Scott Quass

Jim Alves

File (2)



Tarmac America, Inc.

455 Fairway Drive
Deerfield Beach, FL 33441

Telephone: 305 481 2800
Facsimile: 305 480 9352

CERTIFIED MAIL - RRR
Z 056 630 850

RECEIVED

OCT 23 1995

BUREAU OF
AIR REGULATION

18 October 1995

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

RE: **Pennsuco Cement Plant**
Dade County - AP
File No. AC13-273887 [PSD-FL-230]

Dear Mr. Linero:

Please find enclosed the affidavit of publication for the *Notice of Intent to Issue Permit* for the blast furnace at the above named facility. Scott Quaas will await permit issuance subsequent to the required public comment period.

Sincerely,

Regina Peklenk
Administrator Environmental/Real Estate
Technical Services, Florida Region

RP/ad

Enclosure

CC: W. Hanks, BAR
C. Holladay, BAR
S. Brooks, SED
D. Knowles

E. Anderson, DERM
D. Buff, KBN
NPS
EPA

PUBLISHED DAILY
MIAMI-DADE-FLORIDA

STATE OF FLORIDA
COUNTY OF DADE



The Miami Herald Publishing Company

Before the undersigned authority
personally appeared:

OLGA L. ARCIA

who on oath says that he/she is:

CUSTODIAN OF RECORDS

of The Miami Herald, a daily news-
paper published at Miami in Dade
County, Florida; that the attached
copy of advertisement was published
in said newspaper in the issues of:

SEPTEMBER 18, 1995

Affiant further says that the said
The Miami Herald is a newspaper
published at Miami, in the said
Dade County, Florida and that the
said newspaper has heretofore been
continuously published in said Dade
County, Florida each day and has
been entered as second class mail
matter at the post office in Miami,
in said Dade County, Florida, for a
period of one year next preceding
the first publication of the at-
tached copy of advertisement; and
affiant further says that he has
neither paid nor promised any per-
son, firm or corporation any dis-
count, rebate, commission or refund
for the purpose of securing this
advertisement for publication in
the said newspaper(s).

Olga L. Arcia

Sworn to and subscribed before me
this 18th day of September A.D. 1995

My Commission
expires:

Virginia J. Gallon

Virginia J. Gallon

Notary

One Herald Plaza, Miami, Florida 33132-1693 (305) 350-

STATE OF FLORIDA
DEPARTMENT OF
ENVIRONMENTAL
PROTECTION
NOTICE OF INTENT
TO ISSUE PERMIT
AC 13-273887/
PSD-FL-230

The Department of
Environmental Protection
hereby gives notice of its
intent to issue an air pollution
source construction permit to
Tarmac Florida, Inc. 455
Fairway Drive, Deerfield
Beach, Florida 33441. The
permit will authorize the
construction of a blast
furnace slag processing
operation at the existing
Pennaco Cement Plant
located at 11000 NW 121
Way, Medley, Dade County,
Florida 33178.

The proposed facility will
increase the emissions of
particulate matter (PM10) by
27.9 tons per year (TPY),
which is above the significant
emission rate. This increase
subjects the facility to the
Prevention of Significant
Deterioration (PSD)
regulations. The allowable
emissions of PM10 are set by
a Best Available Control
Technology (BACT)
determination. The emissions
will not cause or contribute to
a violation of any
quality standard or PSD
increment.

The Department is issuing
this intent to issue for the
reasons stated in the
Technical Evaluation and
Preliminary Determination.

A person whose substantial
interests are affected by the
Department's proposed
permitting decision may
petition for an administrative
proceeding (hearing) in
accordance with Section
120.57, Florida Statutes. The
petition must contain the
information set forth below
and must be filed (received) in
the Office of General Counsel
of the Department at 2800
Blair Stone Road,
Tallahassee, Florida
32399-2400, within 14 days
of publication of this
notice. Petitioner shall mail a
copy of the petition to the
applicant at the address
indicated above at the time
of filing. Failure to file a
petition within this time
period shall constitute a
waiver of any right such
person may have to request
an administrative
determination (hearing) under
Section 120.57, F.S.

The Petition shall contain
the following information:
(a) The name, address and
telephone number of each
petitioner; the applicant's
name and address; the
Department Permit File
Number; and the county in
which the project is
proposed; (b) A statement of
how and when each
petitioner received notice of
the Department's action or
proposed action; (c) A
statement of how each
petitioner's substantial
interests are affected by the
Department's action or
proposed action; (d) A
statement of the material
facts disputed by Petitioner,
if any; (e) A statement of the
facts which petitioner
contends warrant reversal or
modification of the
Department's action or
proposed action; (f) A
statement of which rules or
statutes petitioner contends
required reversal or
modification of the
Department's action or
proposed action; and
(g) A statement of the
relief sought by the
petitioner, stating precisely
the action petitioner wants
the Department to take with
respect to the
Department's action or
proposed action.

If a petition is filed,
the administrative hearing
process is designed to
formulate agency action.
Accordingly, the
Department's final action
may be different from the
position taken by it in this
Notice. Persons whose
substantial interests will be
affected by any decision of
the Department with regard
to the application have the
right to petition to become a
party to the proceeding. The
petition must conform to the
requirements specified above
and be filed (received) within
14 days of receipt of this
notice in the Office of
General Counsel at the above
address of the Department.
Failure to petition within the
allowed time frame
constitutes a waiver of any
right such person has to
request a hearing under
Section 120.57, F.S., and to
participate as a party to this
proceeding. Any subsequent
intervention will only be at
the approval of the presiding
officer upon motion filed
pursuant to Rule 28-5.207,
Florida Administrative Code.

The application is available
for public inspection during
normal business hours, 9:00
a.m. to 5:00 p.m., Monday
through Friday, except legal
holidays, at:

Department of Environmental
Protection
Bureau of Air Regulation
1115 Magnolia Drive,
Suite 4
Tallahassee, Florida 32301

Department of Environmental
Protection
Southeast District
1800 S. Congress Avenue
Suite A
West Palm Beach, Florida
33408

Dade County Department of
Environmental
Resources
Management
33 S.W. 2nd Avenue
Suite B-223
Miami, Florida 33130

Any person may send
written comments on the
proposed action to Mr. A. A.
Liner, P.E., Administrator,
New Source Review Section,
at the Department of
Environmental Protection,
Bureau of Air Regulation, Mail
Station 5806, 2800 Blair
Stone Road, Tallahassee,
Florida 32399-2400. All
comments received within
30 days of the publication of
this notice will be considered
in the Department's final
determination.

Further, a public hearing can
be requested by any
person(s). Such request must
be submitted within 30 days
of this notice.



October 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

RECEIVED

OCT 9 1995

Bureau of
Air Regulation

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

Dear Mr. Linero:

The purpose of this correspondence is to present comments to the Department regarding the Technical Evaluation and Preliminary Determination (TE&PD) dated September 13, 1995, concerning the above referenced air construction permit for Tarmac Florida, Inc. The comments are presented below, in the order in which they appear in the TE&PD.

Best Available Control Technology Evaluation

The Department's BACT determination concludes that Tarmac's proposed baghouse control technology represents BACT. However, Tarmac has some concern over the PM emission limit specified by the Department. Tarmac proposed a PM emission limit of 0.04 gr/dscf for the slag dryer, whereas the Department has specified a limit of 0.02 gr/dscf. It is acknowledged that a well designed and operated baghouse can generally meet an outlet grain loading of 0.02 gr/dscf. However, in the case of the slag dryer, there are several unknowns. First, the efficiency of a baghouse is dependent on the particle size of the PM in the gas stream. This is an unknown at present since there is no available comparative data from an operating slag dryer. Secondly, the baghouse unit is a pre-NSPS unit designed to control PM emissions from an asphalt concrete plant. The NSPS which were subsequently promulgated for asphalt plants specified a PM limit of 0.04 gr/dscf.

The Department makes the observation in the BACT discussion that the PM emissions for the No. 4 Finish Mill are approximately 0.02 gr/dscf, therefore the slag dryer should be able to meet a similar limit. However, the air to cloth ratio for the No. 4 Finish Mill is 5:1 (30,000 acfm and 6,000 sq. ft. cloth area), whereas the ratio for the slag dryer is 6.5:1 (20,000 acfm and 3,400 sq. ft. cloth area). The lower air to cloth ratio for the finish mill would result in lower PM emissions from the finish mill, other factors being equal.

Based on these concerns, it is requested that the BACT determination and PM emission limit be reworded to allow the BACT to be revised if the initial stack testing indicates that the 0.02 gr/dscf outlet loading is not achievable. Of course, the testing would have to be valid, and provided proper operation and maintenance procedures are followed. Suggested wording is provided below in the specific conditions.

Specific Condition 5

The Department has specified a visible emission limit of 5% opacity for the slag dryer. The regulatory basis for this limit is not clear, since it is not discussed in the BACT determination. The DEP rules would limit

15007A/4

KBN ENGINEERING AND APPLIED SCIENCES, INC.

6241 Northwest 23rd Street,
Suite 500
Gainesville, Florida 32653-1500
904-336-5600 FAX 904-336-6603

5405 West Cypress Street,
Suite 215
Tampa, Florida 33607
813-287-1717 FAX 813-287-1716

1801 Clint Moore Road, Suite 105
Boca Raton, Florida 33487
407-994-9910
FAX 407-994-9393

7785 Baymeadows Way,
Suite 105
Jacksonville, Florida 32256
904-739-5600 FAX 904-739-7777

1616 'P' Street N.W., Suite 450
Washington, D.C. 20036
202-462-1100
FAX 202-462-2270

Mr. A. A. Linero, P.E.

Page 3

October 6, 1995



Thank you for consideration of these comments, and please call if you have any questions concerning this information.

Sincerely,

David A. Buff

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

SEAL

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

DB/ejh

cc: J. Brooks, SFD
E. Anderson, DERM
NPS
EPA
D. Buff, KBN

RECEIVED

SEP 27 1995

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of
Air Regulation

In the Matter of an
Application for Permit by:

DEP File No. AC 13-273887
PSD-FL-230
Dade County

Tarmac Florida, Inc.
455 Fairway Drive
Deerfield Beach, Florida 33441

OGC Case No. 95-_____

REQUEST FOR EXTENSION OF TIME

Tarmac Florida, Inc. ("Tarmac"), by and through undersigned counsel, hereby requests an extension of time, through November 15, 1995, to file a petition for formal administrative proceedings in accordance with Section 120.57(1), Florida Statutes, regarding a proposed air construction permit for a blast furnace slag processing operation at the Pennsuko Cement Plant in Medley, Dade County, Florida [DEP File No. AC 13-273887/PSD-FL-230]. This request for an extension of time is filed pursuant to Rule 62-103.070, Florida Administrative Code. In support of the request, Tarmac states:

1. On September 15, 1995, Tarmac received the Department's Notice of Intent to Issue the above-referenced permit [DEP File No. AC 13-273887/PSD-FL-230]. Under the terms of the notice, Tarmac has until October 2, 1995, to file a petition for administrative proceedings on the proposed permit.

2. The proposed permit contains twenty-one specific conditions, some of which appear to warrant clarification, revision, or other change.

3. Representatives of Tarmac have been or will be conferring with representatives of the Department in an attempt to reach agreement on mutually acceptable permit language. However, additional time is needed to reach such an agreement.

4. This request is filed simply as a protective measure to avoid waiver of Tarmac's right to challenge objectionable conditions in the proposed permit. Grant of this request will not prejudice either party, but will further their mutual interest and likely avoid the need to initiate formal administrative proceedings.

5. I hereby certify that I have attempted to confer with Jefferson M. Braswell, Esq., of the Department's Office of General Counsel, but was not able to reach Mr. Braswell to determine the Department's position on the requested extension.

WHEREFORE, Tarmac respectfully requests that the Department enter an order granting it through and until November 15, 1995, to file a petition for formal administrative proceedings regarding the proposed air construction permit [DEP File No. AC 13-273887/PSD-FL-230] for a blast furnace slag processing operation at the Pennsuco Cement Plant in Medley, Dade County, Florida.

Respectfully submitted this 27th day of September, 1995.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

James S. Alves
Gary V. Perko
Post Office Box 6526
123 South Calhoun Street
Tallahassee, Florida 32314
(904) 222-7500

Attorneys for TARMAC FLORIDA, INC.



the slag dryer to a VE limit of 20% (Rule 62-296.310). A VE limitation of 5% would essentially allow no visible emissions from the dryer at any time, except during startup, shutdown or malfunction. As discussed above, there are several uncertainties associated with the slag dryer and baghouse operation. Therefore, Tarmac requests a visible emission limit of 10% opacity. This would allow a slight visible emission during normal operation.

As discussed above, Tarmac has a concern over the ability of the existing baghouse system to meet a PM emission limit of 0.02 gr/dscf. Tarmac requests that this limit be revisited, if compliance testing indicates that this limit is not achievable. Suggested wording of this condition follows:

The particulate matter emissions (total PM and PM10) from the baghouse serving the slag dryer shall not exceed 0.02 gr/dscf, 2.1 lbs/hr, and 3.1 TPY, or 10 percent opacity. If the initial compliance test for PM/PM10 under this permit demonstrates that this limit is not achievable, the Department may revise the emission limit, not to exceed 0.04 gr/dscf, 4.1 lbs/hr, and 6.15 TPY.

Specific Condition 8

The beginning statement in this condition is somewhat vague, in that it refers to the "yard". It is requested that the following wording be used for clarification:

8. Unconfined PM emissions from the slag storage area shall be minimized by applying the following reasonable precautions:

Paragraphs A. and D. of this condition are prescriptive and do not allow Tarmac the flexibility to implement the most efficient and cost effective fugitive dust control methods. Paragraph A. requires vacuum sweepers to be used to clean the paved areas. Paragraph D. imposes substantial requirements on the slag storage area by requiring wind breaks, enclosures or covers. Periodic watering or other measures may be sufficient to control fugitive emissions in these areas, depending upon operating conditions and weather.

Based on the above concerns, it is requested that paragraph D. be deleted, and paragraph A. be revised to read as follows:

- A. Paved parking and traffic areas shall be well maintained and kept free of particulate matter build-up. Vacuum type sweepers, water sprinklers, wind breaks, enclosures or covers shall be used as necessary to control unconfined particulate matter emissions from the paved parking areas and from handling dried slag in the slag storage area. Sweeper(s) shall be maintained and operated such that visible emissions from the sweeper(s) do not exceed 5% opacity.

Specific Condition 9

It is noted that the current visible emission limit for Cement Storage Silos 1-9 is 20%. The current limit for Clinker Storage Silos 21-23 and 26-28 is 5% opacity.

Specific Condition 15

It is requested that, in accordance with Rule 62-297.620(4), that annual compliance tests for PM be waived if visible emissions from the slag dryer do not exceed 5% opacity.

DRAFT

Permittee:
Tarmac Florida, Inc.

Permit Number: AC 13-273887
(PSD-FL-230)
Expiration Date: 07/01/96

GENERAL CONDITIONS:

credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of non-compliance; and,
- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

DRAFT

Permittee:
Tarmac Florida, Inc.

Permit Number: AC 13-273887
(PSD-FL-230)
Expiration Date: 07/01/96

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of



Department of Environmental Protection

DRAFT

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

Permittee:
Tarmac Florida, Inc.
455 Fairway Drive
Deerfield Beach, FL 33441

Permit Number: AC 13-273887
(PSD-FL-230)
Expiration Date: 07/01/96
Latitude/Longitude: 25°52'26"
80°22'27"
Project: Blast Furnace Slag
Processing Operation

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-212 and 62-4, Florida Administrative Code (F.A.C.). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Construct a Blast Furnace Slag Processing Operation at the existing Pennsuco Cement Plant located at 11000 N.W. 121 Way, Medley, Dade County, Florida 33178. The UTM coordinates of this site are Zone 17, 562.8 km E and 2861.7 km N.

Major components of the proposed blast furnace slag processing operation are a new 10,000 gallon fuel storage tank and a used 150 ton per hour (TPH) asphalt dryer with a baghouse. The slag processing operation will use the Portland cement plant's existing Clinker Silos (Nos. 21, 22, 23, 26, 27, and 28 for dried slag storage), Cement Silos (Nos. 7, 8, and 9 for the ground slag storage), No. 4 Finish Mill, and Bulk Cement Loadout Units Nos. 1 and 2.

The emission units shall be constructed and operated in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application received July 10, 1995.
2. DEP letter dated July 24, 1995.
3. KBN letter dated August 11, 1995.

15007Y/F1
08/11/95

Table 3-1. Maximum Emissions Due to Fuel Combustion for Slag Dryer,
Tarmac Florida

Parameter	No. 2 Fuel Oil		
OPERATING DATA			
Operating Time (hr/yr)	3,000		
Heat Input Rate (MMBtu/hr)	52.0		
Fuel Oil Use (gal/hr) ^a	371.4		
Fuel Oil Use (gal/yr)	1,114,286		
Maximum Sulfur Content (Wt %)	0.2		
Pollutant	Emission Factor ^b	Maximum Emissions	
		lb/hr	TPY
EMISSIONS DATA			
SO ₂ :	142*S lb/Mgal ^c	26.37	39.55
NO _x :	20 lb/Mgal	7.43	11.14
CO:	5 lb/Mgal	1.86	2.79
NM VOC:	0.2 lb/Mgal	0.074	0.11
Sulfuric Acid Mist:	0.1225 lb/Mgal	0.046	0.068
Lead-Total:	8.9E-06 lb/MMBtu	4.63E-04	6.94E-04
Mercury:	3.0E-06 lb/MMBtu	1.56E-04	2.34E-04
Beryllium:	2.5E-06 lb/MMBtu	1.30E-04	1.95E-04

Note: NA = not applicable.

^a Based on 140,000 Btu/gal for 0.5% S oil.

^b Emission factors based on AP-42.

^c "S" denotes the weight % sulfur in fuel oil; max sulfur content = 0.5%

The visible emissions standards for these operations will be:

Storage Piles - 20 percent opacity
Belt Conveyer Transfer Points - 10 percent opacity
Finish Mill Baghouse - 5 percent opacity
Silo Baghouses - 5 percent opacity
Bulk Loadout Operation - 10 percent opacity

IV. AIR QUALITY IMPACT ANALYSIS

The increase in emissions from the blast furnace slag processing operation will not cause a violation of any ambient air quality standard.

V. CONCLUSION

On the basis of the information provided by Tarmac Florida, Inc., the Department has reasonable assurance that the proposed blast furnace slag processing operation, as described in this evaluation and subject to the conditions proposed within, will not cause a violation of any air quality standard, PSD increment, or other technical provision of Chapter 62-212 of the Florida Administrative Code.

oaj 9/13

Table 4-1. Emissions Increase Associated With Slag Project, Tarmac Florida, Inc.

Regulated Pollutant	Cement Production Facilities				(A+B-C+D) Net Increase In Emissions (TPY)	PSD Significant Emission Rate (TPY)	PSD Review Applies?
	(A) Slag Dryer Emissions (TPY)	(B) Fugitives From Slag Handling (TPY)	(C) Current Actuals (TPY)	(D) Future Maximums (TPY)			
Particulate matter (TSP)	6.15	7.96	9.64	31.72	36.2	25	Yes
Particulate matter (PM10)	6.15	2.79	9.64	31.72	31.0	15	Yes
Sulfur dioxide	39.60	--	--	--	39.6	40	No
Nitrogen oxides	11.14	--	--	--	11.1	40	No
Carbon monoxide	2.79	--	--	--	2.8	100	No
Volatile organic compounds	0.11	--	--	--	0.11	40	No
Sulfuric acid mist	0.068	--	--	--	0.07	7	No
Total reduced sulfur	--	--	--	--	--	10	No
Lead	0.0007	--	--	--	0.0007	0.6	No
Mercury	0.0002	--	--	--	0.0002	0.1	No
Beryllium	0.0002	--	--	--	0.0002	0.0004	No
Fluorides	--	--	--	--	--	3	No
Asbestos	--	--	--	--	--	0.007	No
Vinyl Chloride	--	--	--	--	--	1	No

III. TECHNICAL EVALUATION

Up to 300,000 TPY of blast furnace slag will be hauled to the plant by trucks. The slag will contain 6 to 10 percent moisture. The applicant stated that the storage and handling of the slag will not cause a fugitive dust problem. Should a problem develop, the applicant will apply water to the slag or take additional measures to maintain the visible emissions from handling the slag below 20 percent opacity. The additional measures could include the installation of permanent water applicators for the undried slag and the barriers to reduce the wind across the dried slag.

Front-end loaders will transfer the slag to a hopper that discharges to a conveyor that takes the slag to the 150 TPH (design) asphalt plant dryer. The average processing rate is expected to be 100 TPH. No. 2 fuel oil containing a maximum of 0.5 percent sulfur from a new 10,000 gallon (maximum) fuel oil storage tank will be consumed by the dryer at a maximum rate of 52 MMBtu/hr (approximately 371.4 GPH). Maximum annual fuel consumption by this dryer will be 1,114,286 GPY. The estimated emissions of the products of combustion from this fuel are shown in Table 3-1 (revised August 11, 1995) from the application.

Particulate matter (PM) emissions from the dryer will be controlled by a Flex-Kleen baghouse that has a 6.48:1 air to cloth ratio. The applicant proposed an emission limit of 0.04 gr/dscf which is the new source performance standard for asphalt concrete plants. The Department's Best Available Control Technology (BACT) determination set the emission standard for PM at 0.02 gr/dscf. This standard is equivalent to 2.1 lbs/hr and 3.1 TPY PM emission from the proposed dryer. See the attached BACT for more information on this limit.

The slag leaving the dryer, which contains about 5 percent moisture, is placed in open storage piles. The Department will require reasonable precautions to prevent visible emissions from the handling of the dried slag in the yard. These precautions may include wind breaks, enclosures or other means to minimize unconfined emissions.

Front-end loaders transfer the dried slag to the existing conveyor which will deliver it to the existing clinker silos. It is later transferred and ground in Finishing Mill No. 4. The application states that the allowable emissions from the baghouse controlling this mill will be reduced to 0.01 grains per actual cubic foot (gr/acf). The ground slag from the mill will be sent to the existing cement silos and shipped out of the plant by Bulk Loadout Units Nos. 1 and 2.

Table 3-2. Fugitive Dust Emissions For Slag Project, Tarmac Florida, Inc.

SOURCE	TYPE OF OPERATION	M MOISTURE CONTENT (%)	U WIND SPEED (MPH)	UNCONTROLLED EMISSION FACTOR* (LB/TON)	CONTROL	CONTROL EFFICIENCY (%)	CONTROLLED EMISSION FACTOR (LB/TON)	ACTIVITY FACTOR	MAXIMUM ANNUAL PM(TSP) EMISSIONS (TONS/YR)	PM10 SIZE MULT.	MAXIMUM ANNUAL PM10 EMISSIONS (TONS/YR)
TRUCK DUMP	BATCH DROP	6	9	0.00148	NONE	0	0.00148	300,000 TPY	0.221	0.35	0.077
FRONTEND LOADER-TO-HOPPER	BATCH DROP	6	9	0.00148	NONE	0	0.00148	300,000 TPY	0.221	0.35	0.077
HOPPER-TO-BELT	CONTINUOUS DROP	6	9	0.00148	NONE	0	0.00148	300,000 TPY	0.221	0.35	0.077
DRYER-TO-RADIAL STACKER	CONTINUOUS DROP	3	9	0.00389	NONE	0	0.00389	300,000 TPY	0.584	0.35	0.204
RADIAL STACKER-TO-STORAGE PILE	CONTINUOUS DROP	3	9	0.00389	NONE	0	0.00389	300,000 TPY	0.584	0.35	0.204
FRONTEND LOADER-TO-HOPPER	BATCH DROP	3	9	0.00389	NONE	0	0.00389	300,000 TPY	0.584	0.35	0.204
HOPPER-TO-CONVEYOR Y76	CONTINUOUS DROP	3	9	0.00389	NONE	0	0.00389	300,000 TPY	0.584	0.35	0.204
CONVEYOR Y76-TO-Y75	CONTINUOUS DROP	3	9	0.00389	PARTIAL ENCLOSURE	50	0.00195	300,000 TPY	0.292	0.35	0.102
CONVEYOR Y75-TO-Y78	CONTINUOUS DROP	3	9	0.00389	PARTIAL ENCLOSURE	50	0.00195	300,000 TPY	0.292	0.35	0.102
CONVEYOR Y78-TO-Y79	CONTINUOUS DROP	3	9	0.00389	PARTIAL ENCLOSURE	50	0.00195	300,000 TPY	0.292	0.35	0.102
CONVEYOR Y79-TO-Y102	CONTINUOUS DROP	3	9	0.00389	PARTIAL ENCLOSURE	50	0.00195	300,000 TPY	0.292	0.35	0.102
CONVEYOR Y102-TO-CLINKER SILOS	CONTINUOUS DROP	3	9	0.00389	PARTIAL ENCLOSURE	50	0.00195	300,000 TPY	0.292	0.35	0.102
SLAG STORAGE PILES (2)	WIND EROSION	--	--	--	NONE	0	--	--	0.027 ^d	0.5	0.014
SLAG STORAGE PILES MAINTENANCE	VEHICULAR TRAFFIC	--	--	0.96 ^b	WATERING	50	0.93 ^b	15,000 VMT ^c	3.470 ^d	0.35	1.215
TOTAL									7.958		2.790

Notes/References

* Batch Drop and Continuous Drop Emission Factors are computed from AP-42 (USEPA, 1988), Section 11.2.3:

$$E = 0.0032 \times (U/5)^{1.3} / (M/2)^{1.4} \text{ lb/ton}$$

^b Pound per Vehicle Mile Travel (lb/VMT), see Appendix for derivation.

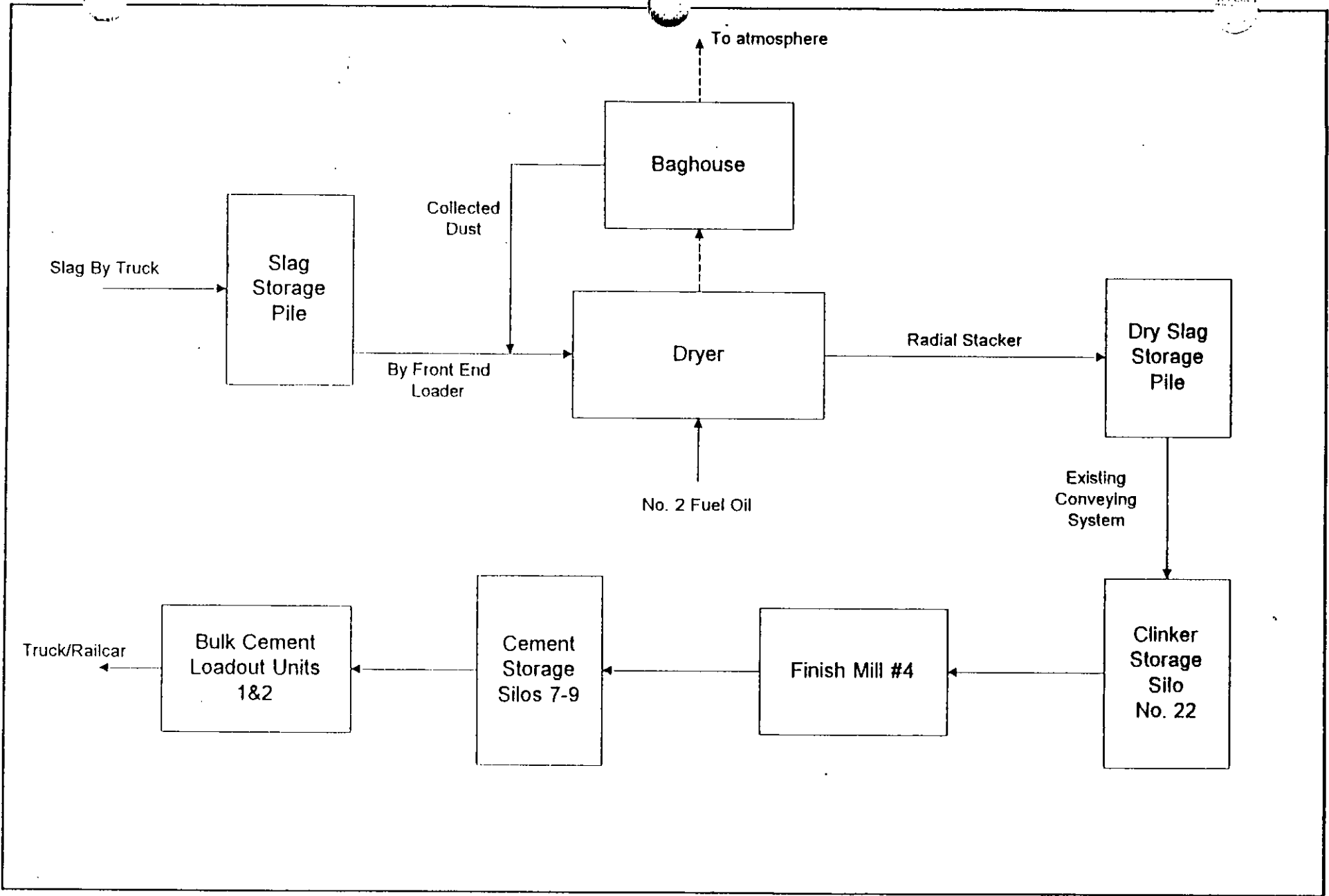
^c Based on vehicle operating 3,000 hrs/yr @ 5 mph.

^d Refer to Appendix for derivation.

10

Table 3-4. Future Maximum Particulate Emissions From Cement Production Facilities, Tarmac Florida, Inc.

Emission Unit/Point	Emission Point ID	Control Equipment Type	Maximum Process Rate (TPH)	Air Flow Rate (cfm)	PM Emission Factor	PM Emissions		
						(lb/hr)	(hr/yr)	(TPY)
<u>Clinker Storage Silos</u>								
Clinker silos 21, 22, 23, 26, 27 & 28	K-633	Baghouse	150.0	1,500	0.01 gr/acf	0.13	8,760	0.56
<u>Finish Mill #4</u>								
Ball mill/mill sweep	F-430	Baghouse	150.0	30,000	0.01 gr/acf	2.57	8,760	11.26
Belt conveyor/separator/cement pump	F-432	Baghouse	150.0	17,000	0.01 gr/acf	1.46	8,760	6.38
Clinker/gypsum conveyors	F-603	Baghouse	150.0	8,000	0.01 gr/acf	0.69	8,760	3.00
Clinker/gypsum conveyors	F-604	Baghouse	150.0	8,000	0.01 gr/acf	0.69	8,760	3.00
Clinker/gypsum conveyors	F-605	Baghouse	150.0	4,000	0.01 gr/acf	0.34	8,760	1.50
<u>Cement Storage Silos 1-9</u>								
Cement Silos 7-9	F-512	Baghouse	150.0	10,000	0.01 gr/acf	0.86	8,760	3.75
<u>Bulk Cement Loadout Units 1 & 2</u>								
Railcar/Truck Unit 1	B-110	Baghouse	300.0	3,000	0.01 gr/acf	0.26	8,760	1.13
Truck Unit 2	B-210	Baghouse	300.0	3,000	0.01 gr/acf	0.26	8,760	1.13
TOTAL =						7.24		31.72



4

Figure 2-3 Flow Diagram of Slag Processing System, Tarmac Florida

Process Flow Legend Gas → Solid/Liquid →	<i>Emission Unit:</i>
	<i>Process Area:</i>
	<i>Filename:</i> TARMAC1.VSD
	<i>Latest Revision Date:</i> 6/27/95

KBN Engineering and Applied Sciences, Inc.

Based on a fuel consumption of 371.4 gallons per hour (GPH) of No. 2 fuel oil (52 MMBtu/hr heat input) for 3,000 hrs/yr and AP-42 emission factors, the emissions of the products of combustion from the dryer will be 26.4 lbs/hr and 39.6 TPY sulfur dioxide (SO₂), 7.43 lbs/hr and 11.14 TPY nitrogen oxides (NO_x), 1.86 lbs/hr and 2.79 TPY carbon monoxide (CO), and smaller quantities of volatile organic compounds (VOC), sulfuric acid mist (SAM), lead, mercury, and beryllium.

Based on the procedures listed in AP-42, fugitive dust emissions from the handling and storage of the slag were estimated to be 7.958 TPY PM and 2.790 TPY PM₁₀. Emissions of particulate matter (PM) from the silos, mill, conveyers, and loadout units were estimated at 31.72 TPY. Tables 3-2 and 3-4 of the application summarize these emission estimates.

The proposed increase in emissions from the facility resulting from the blast furnace slag processing operation (36.2 TPY PM and 31.0 TPY PM₁₀) exceed the significant emissions rates listed in Chapter 212, F.A.C. The increase in emissions of the other air pollutants that will be emitted by the proposed slag processing plant are less than the significant emissions rates. Table 4-1 (revised August 11, 1995) from the application is a summary of the requested increase in emissions from the proposed slag operation.

II. RULE APPLICABILITY

The proposed project, construction of a blast furnace slag processing operation at an existing Portland cement plant (SIC 3241), is subject to the preconstruction requirements under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4 and 62-212, Florida Administrative Code (F.A.C.).

The Portland cement plant is located in Dade County. This air quality area is designated attainment/maintenance for ozone (Rule 62-275.420, F.A.C.) and is attainment for the other criteria pollutants (Rule 62-275.400, F.A.C.).

The Portland cement plant is a major facility. The proposed furnace slag processing operation will increase emissions of particulate matter, both PM and PM₁₀, by more than the significant emission rates. Therefore, the proposed project is subject to the New Source Review (NSR) requirements pursuant to Rule 62-212.400(5), F.A.C., which requires a Best Available Control Technology (BACT) determination for PM and PM₁₀. The net emissions increase of all pollutants due to the proposed slag processing operation is less than 50 TPY. Therefore the project is exempt from the requirements of Rule 62-212.400(5)(d), (e), (f), and (g), F.A.C., which are requirements for ambient impact analysis, additional impact analysis, preconstruction air quality monitoring analysis, and post construction monitoring (Rule 62-212.400(3)(d), F.A.C.).

Technical Evaluation
and
Preliminary Determination

Tarmac Florida, Inc.
Pennsuco Cement Plant
Medley, Florida
Dade County

Blast Furnace Slag Processing Operation

Department File No. AC 13-273887
PSD-FL-230

Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation

September 13, 1995

I. GENERAL INFORMATION

A. Applicant

Tarmac Florida, Inc.
455 Fairway Drive
Deerfield Beach, Florida 33441

B. Request

On July 10, 1995, Tarmac Florida, Inc. submitted an application for an air construction permit to build a blast furnace slag processing operation at the Pennsuco Cement Plant (SIC 3241) located in Medley, Dade County, Florida. The UTM coordinates of this site are Zone 17, 562.8 km E and 2861.7 km N. The application was complete on August 14, 1995.

C. Project

The applicant proposes to process 300,000 ton per year (TPY) blast furnace slag at an existing Portland cement plant. The proposed slag processing operation will have a new 10,000 gallon fuel oil storage tank and an existing 150 ton per hour (TPH) slag dryer (asphalt plant dryer built in 1972) that uses 52 million British thermal units per hour (MMBtu/hr) heat input from No. 2 fuel oil. The particulate emissions will be controlled by a baghouse. The blast furnace slag processing operation will use the existing Clinker Storage Silos (Nos. 21, 22, 23, 26, 27, and 28), Finishing Mill No. 4, Cement Storage Silos 1, 2, 3, 4, 5, 6, 7, 8, and 9, and Bulk Loadout Units 1 and 2 at the Portland cement plant. The emissions from the silos and mill are controlled with baghouses.

The slag will be brought to the plant in trucks, dried in the asphalt plant dryer, and ground, stored, handled and shipped in the existing finish mill, clinker and cement silos, and loadout units.

The process flow diagram on the following page gives an overview of the proposed process.

D. Emissions

Air pollutants will be emitted from the dryer and during the handling, grinding, and storage of the slag.

The dryer will emit particulate matter (PM and PM10) along with the products of combustion of the No. 2 fuel oil. The applicant requested a particulate matter emission standard of 0.04 grains per dry standard cubic foot (gr/dscf) for the baghouse serving the modified dryer. With the estimated gas flow of 12,000 dscfm and using a maximum of 3,000 hrs/yr operation, the PM emissions at this concentration would be 4.1 lbs/hr and 6.15 TPY.

Tarmac Florida, Inc.
AC 13-273887
PSD-FL-230

Dade County Department of Environmental
Resources Management
33 S.W. 2nd Avenue
Suite 9-223
Miami, Florida 33130

Any person may send written comments on the proposed action to Mr. A. A. Linero, P.E., Administrator, New Source Review Section, at the Department of Environmental Protection, Bureau of Air Regulation, Mail Station 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. All comments received within 30 days of the publication of this notice will be considered in the Department's final determination.

Further, a public hearing can be requested by any person(s). Such request must be submitted within 30 days of this notice.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT

AC 13-273887/PSD-FL-230

The Department of Environmental Protection gives notice of its intent to issue an air pollution source construction permit to Tarmac Florida, Inc., 455 Fairway Drive, Deerfield Beach, Florida 33441. The permit will authorize the construction of a blast furnace slag processing operation at the existing Pennsuco Cement Plant located at 11000 NW 121 Way, Medley, Dade County, Florida 33178. The proposed operation will consist of a 150 ton per hour (TPH) blast furnace slag dryer. The dryer will use No. 2 fuel oil from a new 10,000 gallon storage tank. Particulate matter emissions will be controlled with a baghouse. Subsequent material processing will be accomplished through the use of the existing No. 4 finishing mill, clinker silos, cement silos, and loading system. The operation will process 300,000 tons per year (TPY) blast furnace slag. The product will be shipped for use as a raw material at concrete batch plants.

The proposed facility will increase the emissions of particulate matter (PM10) by 27.9 tons per year (TPY) which is above the significant emission rate. This increase subjects the facility to the Prevention of Significant Deterioration (PSD) regulations. The allowable emissions of PM10 are set by a Best Available Control Technology (BACT) determination. The emissions will not cause or contribute to a violation of any air quality standard or PSD increment.

The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

Tarmac Florida, Inc.
AC 13-273887
PSD-FL-230

The Petition shall contain the following information; (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed; (b) A statement of how and when each petitioner received notice of the Department's action or proposed action; (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action; (d) A statement of the material facts disputed by Petitioner, if any; (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement of which rules or statutes Department's action or proposed action; and, (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Department of Environmental Protection
Southeast District
1900 S. Congress Avenue
Suite A
West Palm Beach, Florida 33406

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one true and correct copy of the foregoing motion was hand-delivered to Kathy Carter, Clerk, Department of Environmental Protection, 3900 Commonwealth Blvd., Tallahassee, FL 32399-2400, and a true and correct copy was sent to the following this 27 day of September, 1995.

BY HAND-DELIVERY

Jefferson M. Braswell, Esquire
Office of General Counsel
Department of Environmental Protection
3900 Commonwealth Blvd., Room 353-3
Tallahassee, Florida 32399-3000

Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Division of Air Resources Management
Department of Environmental Protection
111 South Magnolia, Suite 4
Tallahassee, FL 32301



Attorney