Golder Associates Inc.

6241 NW 23rd Street, Suite 500 Gainesville, FL 32653-1500 Telephone (352) 336-5600 Fax (352) 336-6603

May 13, 1997

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

RE: Tarmac Florida, Inc.

Slag Dryer

Draft Permit No. 0250020-001-AC, PSD-FL-236

RECEIVED
MAY 1 4 1997
BUREAU OF
AIR REGULATION

Dear Mr. Linero:

Presented in this correspondence are comments concerning the draft construction permit for Tarmac's new slag dryer. The draft permit was issued by the Department on March 3, 1997. The comments are presented in the same order as the various sections of the draft permit.

Technical Evaluation and Preliminary Determination

page 1 of 3: I.C. Project - Please note that Tarmac has slightly modified the proposed location of the new slag dryer such that only one conveyor will be required from the dryer to the existing clinker handling system. As a result of this, the baghouse serving the conveyor transfer point will no longer be required. Therefore, this emission point should be eliminated from the construction permit. A revised emission unit form for the slag dryer is attached, as well as two revised tables from Attachment A of the application, and a revised plot plan and flow diagram reflecting these changes. The changes result in a decrease in potential emissions from the slag dryer system.

Draft Permit

Page 3 of 5: A.1. - The reference to permit no. AC13-234568 should be deleted from this condition. This permit is for the aggregate plant, and was relevant to the original slag dryer construction permit, when the slag dryer was being located in the aggregate plant and using aggregate plant conveyors. Now the slag dryer is located in the cement plant, and none of the aggregate plant conveyors will be utilized for the dried slag.

Page 3 of 5: A.3. - The basis for requiring a minimum stack height and maximum stack diameter for the dryer are questioned. Although Tarmac is planning on a stack height of at least 30 feet, the actual stack diameter could potentially be larger than 4 feet. However, such a change would not affect emissions and would minimally affect atmospheric dispersion. It is requested that this condition be deleted.

Page 3 of 5: A.4. - PSD is a preconstruction review program. It is not clear how the slag operation can be operated so that it can comply with the PSD requirements.

A.A. Linero Page 2 May 13, 1997

Page 3 of 5: A.6. - The slag conveyor transfer point and associated baghouse has been removed from the project. Therefore, this condition should be deleted.

Page 4 of 5: A.9.d. - The opacity limit should be shifted to the right to align with the other opacity limits shown in this condition.

Table 1: The dry slag conveying system emission point should be removed from the table. In addition, the following maximum process rate for the slag dyer should be 125.0 TPH.

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

Sincerely,

· David a. Buff David A. Buff, P.E. Principal Engineer

Florida P.E. #19011 (SEAL)

DB/arz

cc: Al Townsend

Scott Quass

Jim Alves

File (2)

CC: W. Hanks, BAR 5ED Dade Co NP5

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through L as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application. Some of the subsections comprising the Emissions Unit Information Section of the form are intended for regulated emissions units only. Others are intended for both regulated and unregulated emissions units. Each subsection is appropriately marked.

A. TYPE OF EMISSIONS UNIT (Regulated and Unregulated Emissions Units)

Type of Emissions Unit Addressed in This Section

l.	R	egulated or Unregulated Emissions Unit? Check one:
(x]	The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
[]	The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.
2.	Si	ngle Process, Group of Processes, or Fugitive Only? Check one:
[x]	This Emissions Unit information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
]]	This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
]]	This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

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Emissions	Unit	Information	Section	1	of 4	
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B. GENERAL EMISSIONS UNIT INFORMATION (Regulated and Unregulated Emissions Units)

Emissions Unit Description and Status

	s Unit Addressed in This Section sys., Storage Pile & #2 Fuel Oil Tai	
2. Emissions Unit Identifica	ation Number: [x] No Corr	responding ID [] Unknown
3. Emissions Unit Status Code: C	4. Acid Rain Unit? [] Yes [X] No	5. Emissions Unit Major Group SIC Code: 32
6. Emissions Unit Comment Fuel oil tank will be 10,00	t (limit to 500 characters): O gallons capacity, and not subje	ect to NSPS.

Emissions Unit Control Equipment Information

Δ.	

1. Description (limit to 200 characters):

Fabric Filter

2. Control Device or Method Code: 16

В.

1. Description (limit to 200 characters):

2. Control Device or Method Code:

C.

1. Description (limit to 200 characters):

2. Control Device or Method Code:

Emissions	Unit	Information	Section	1	of	4
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C. EMISSIONS UNIT DETAIL INFORMATION (Regulated Emissions Units Only)

Emissions Unit Details

1.	Initial Startup Date:		
2.	Long-term Reserve Shutdown Date:	- ·	
3.	Package Unit: Manufacturer:	Model Number:	
4.	Generator Nameplate Rating:	MW	
5.	Incinerator Information: Dwell Temperature: Dwell Time: Incinerator Afterburner Temperature:	°F seconds °F	

Emissions Unit Operating Capacity

1. Maximum Heat Input Rate:		57	mmBtu/hr
2. Maximum Incineration Rate:	lbs/hr		tons/day
3. Maximum Process or Throughput Rate:		125	tons/hr
4. Maximum Production Rate:			
5. Operating Capacity Comment (limit to 20	00 characters)	:	
		٠.	

Emissions Unit Operating Schedule

1. Requested Maximum Operating Schedule:							
24	hours/day	7	days/week				
52	weeks/yr	3,120	hours/yr				

D. EMISSIONS UNIT REGULATIONS (Regulated Emissions Units Only)

<u>Rule Applicability Analysis</u> (Required for Category II Applications and Category III applications involving non Title-V sources. See Instructions.)

Not Applicable	
	;

Emissions Unit Information Section _	_1	of	4	
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<u>List of Applicable Regulations</u> (Required for Category I applications and Category III applications involving Title-V sources. See Instructions.)

62-296.320(4)(a) Process Weight Table
62-296.320(4)(b) Visible Emissions

Emissions Unit Information Section	1 0	f _	4
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E. EMISSION POINT (STACK/VENT) INFORMATION (Regulated Emissions Units Only)

Emission Point Description and Type

_										
1.		enti uos	fication of	of Po	oint on I	Plot Plar	or Flo	w Diagra	ım:	
2.	En	niss	ion Point	Ty	e Code	e:				
	[]	1	[] 2		[x]3	3	[]	4
3.	De to	escr 100	iptions of Characte	En ers p	issions er poin	Points (it):	Compris	sing this	Emissio	ons Unit for VE Tracking (limit
	Si	lag	Dryer; Sla	ıg ha	andling	and stor	age ope	erations		
			<u>.</u>					_		
4.	ID	Nu	ımbers or	De	scriptio	ns of En	nission l	Units wit	h this l	Emission Point in Common:
								·		
5.	Di:		arge Type			г	7 7 7	r	10	
	[]]]]		[] F x] V	[] H] W	l] P	
6	Sta	ıck	Height:							feet
			————						30	reet
7.	Ex	it D	iameter:			_			4	feet
8.	Exi	it T	emperatu	re:					300	°F

Source	Information	Section	1	of	4
Over CC.	THINKSTIVE	Cection		vı	

					(
9.	Actual Volu	metric Flow Rate:	44,486	acfm	
10.	Percent Wat	er Vapor:	10	%	
11.	Maximum D	ry Standard Flow Rate:	27,820	dscfm	
12.	Nonstack Er	nission Point Height:		feet	
13.	Emission Po	int UTM Coordinates:			
	Zone:	East (km):	North	(km):	
14.	Emission Po	int Comment (limit to 200 ch	naracters):		
	Stack data r	epresentitive of slag dryer.			
		4			
		•			
	,				

Emissions Unit Information Section 1 of 4	Emissions	Unit	Information	Section	1	of	4
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F. SEGMENT (PROCESS/FUEL) INFORMATION (Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment ____ of ____ 5

1.	1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):				
	Material Products; Cement Manufacturi	ng Wet Process; Raw material grinding and drying			
		•			
2.	Source Classification Code (SCC):				
	•	-05-006-13			
3.	SCC Units:				
	tons cement produced				
4.	Maximum Hourly Rate:	5. Maximum Annual Rate:			
	125	300,000			
6.	Estimated Annual Activity Factor:				
7.	Maximum Percent Sulfur:	8. Maximum Percent Ash:			
9.	Million Btu per SCC Unit:				
	Diamon 2ta por 500 ome.				
10	IO Someont Command (limit to 200 days)				
10.	10. Segment Comment (limit to 200 characters):				
	Raw material is blast furnace slag. Maximum rates reflect slag throughput.				

Segment Description and Rate: Segment 2 of 5

Segment Description (Process/Fuel Ty (limit to 500 characters): Mineral Products; Fuel-Fired Equipment	ype and Associated Operating Method/Mode) ; Process Heaters; Distillate Oil
2. Source Classification Code (SCC):	3-05-900-01
3. SCC Units: 1000 gall	lons burned
4. Maximum Hourly Rate: 0.41	5. Maximum Annual Rate:
6. Estimated Annual Activity Factor:	
7. Maximum Percent Sulfur: 0.2	8. Maximum Percent Ash:
9. Million Btu per SCC Unit:	140
 Segment Comment (limit to 200 char No. 2 fuel oil burning in slag dryer. 	acters):

F. SEGMENT (PROCESS/FUEL) INFORMATION (Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment __3 __ of __5

1.	1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):				
	Material Products: Fuel-Fired Equipment; Process Heaters Natural Gas				
2.	Source Classification Code (SCC):				
_		-05-900-03 			
3.	SCC Units:				
	Million Cubic Feet				
4.	Maximum Hourly Rate:	5. Maximum Annual Rate:			
	0.057	179			
6.	Estimated Annual Activity Factor:				
7.	Maximum Percent Sulfur:	8. Maximum Percent Ash:			
9.	Million Btu per SCC Unit:				
	•	1,000			
10.	Segment Comment (limit to 200 chara	acters):			
	Maximum Annual Rate = 224.6 (rounded to 225). Natural gas burning in slag dryer.				

Segment Description and Rate: Segment 4 of 5

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):

Petroleum Product Storage - Fixed Roof Tanks. Distillate Fuel #2 - Working Loss.

2. Source Classification Code (SCC):

4-03-010-21

3. SCC Units:

1000 gallons throughput

4. Maximum Hourly Rate:

. N 41

5. Maximum Annual Rate:

1,281

- 6. Estimated Annual Activity Factor:
- 7. Maximum Percent Sulfur:

8. Maximum Percent Ash:

- 9. Million Btu per SCC Unit:
- 10. Segment Comment (limit to 200 characters):

F. SEGMENT (PROCESS/FUEL) INFORMATION (Regulated and Unregulated Emissions Units)

Segment Description and Rate: Segment ____ of ____ 5

_					
1.	1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):				
	Petroleum Product Storage - Fixed Roo	f Tanks. Distillate Fuel #2 - Breathing Loss			
ĺ					
2	Source Classification Code (SCC):				
~.		-03-010-19			
3.	SCC Units:				
	1,000 gallons				
4.	Maximum Hourly Rate:	5. Maximum Annual Rate:			
		10			
6.	Estimated Annual Activity Factor:				
	•				
7	Maximum Percent Sulfur:	8. Maximum Percent Ash:			
, ,	Maximum I Grownt Buntin	6. Waxiindiii i cicciit Asii.			
	New Proceedings				
9.	Million Btu per SCC Unit:				
10.	Segment Comment (limit to 200 chara	acters):			

Segment Description and Rate: Segment _____ of ____

1. Segment Description (Process/Fuel Type and Associated Operating Method/Mode) (limit to 500 characters):					
2. Source Classification Code (SCC):					
3. SCC Units:					
4. Maximum Hourly Rate:	5. Maximum Annual Rate:				
6. Estimated Annual Activity Factor:					
7. Maximum Percent Sulfur:	8. Maximum Percent Ash:				
9. Million Btu per SCC Unit:					
10. Segment Comment (limit to 200 chara	acters):				

G. EMISSIONS UNIT POLLUTANTS (Regulated and Unregulated Emissions Units)

Pollutant Emitted	Primary Control Device Code	Secondary Control Device Code	4. Pollutant Regulatory Cod
PM PM10	016 016		EL EL
SO2	010		ns
NOX			ns ns
			,
		•	

Emissions Unit Information Section 1	of	4
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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: PM				
2. Total Percent Efficiency of Control: %				
3. Potential Emissions: 9.5 lb/hour 14.9 tons/year				
4. Synthetically Limited? [x] Yes [] No				
5. Range of Estimated Fugitive/Other Emissions:				
[] 1 [] 2 [] 3 tototons/yr				
6. Emission Factor:				
Reference: See Attachment A				
7. Emissions Method Code:				
[x]0 []1 []2 []3 []4 []5				
8. Calculation of Emissions (limit to 600 characters):				
Slag Dryer: 0.04 gr/dscf x 27,820 dscfm x 60 min/hr \div 7000 gr/lb = 9.54 lb/hr; 9.54 lb/hr x 3120 hr/yr x ton/2000 lb = 14.9 TPY. Fugitive emissions: estimated in Table 3-2, see Attachment A.				
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):				
Slag dryer is limited to 3,120 hours per year. Potential emissions above do not include fugitives.				

Emissions Unit Information Section	1	of _	4	F
Allowable Emissions (Pollutant iden	tified o	n fron	t page)	

1.84			
1.	Basis for Allowable Emissions Code: OTHER		
2.	Future Effective Date of Allowable Emissions:		
3.	Requested Allowable Emissions and Units:		
	0.04 gr/dscf		
4.	Equivalent Allowable Emissions: 9.54	lb/hour	14.9 tons/year
5.	Method of Compliance (limit to 60 characters):		
	EPA Method 9 and Method 5		
6.	Pollutant Allowable Emissions Comment (Desc. (limit to 200 characters):	of Related Operati	ng Method/Mode)
	Proposed BACT limit for slag dryer.		
В.			
1.	Basis for Allowable Emissions Code:		
2.	Future Effective Date of Allowable Emissions:		
3.	Requested Allowable Emissions and Units:		
4.	Equivalent Allowable Emissions:	lb/hour	tons/year
5.	Method of Compliance (limit to 60 characters):		
	,	•	
6.	Pollutant Allowable Emissions Comment (Desc. (limit to 200 characters):	of Related Operation	ng Method/Mode)

Emissions Unit I	nformation Section	1	of	4	
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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: PM10
2. Total Percent Efficiency of Control: %
3. Potential Emissions: 9.5 lb/hour 14.9 tons/year
4. Synthetically Limited? [x] Yes [] No
5. Range of Estimated Fugitive/Other Emissions:
[] 1 [] 2 [] 3 totons/yr
6. Emission Factor:
Reference: See Attachment A
7. Emissions Method Code:
[x]0 []1 []2 []3 []4 []5
8. Calculation of Emissions (limit to 600 characters):
Slag Dryer: 0.04 gr/dscf x 27,820 dscfm x 60 min/hr \div 7000 gr/lb = 9.54 lb/hr; 9.54 lb/hr x 3120 hr/yr x ton/2000 lb = 14.9 TPY. Fugitive emissions are estimated in Table 3-2, Attachment A.
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters): Slag dryer is limited to 3,120 hours per year. Potential emissions above do not include fugitives.

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Emissions Unit Information Se	ction	1	of _	4
Allowable Emissions (Pollutan	t identific	ed on	front	page)

A.	wadie Emissions (Fonutant identified on froi	it pagej	
1.	Basis for Allowable Emissions Code: OTHER	****	
2.	Future Effective Date of Allowable Emissions:		
3.	Requested Allowable Emissions and Units: 0.04 gr/dscf		
4.	Equivalent Allowable Emissions: 9.5	4 lb/hour	14.9 tons/year
5.	Method of Compliance (limit to 60 characters)	·	
	EPA Method 9 and Method 5		
6.	Pollutant Allowable Emissions Comment (Desc (limit to 200 characters):	of Related	Operating Method/Mode)
	Proposed BACT limit for slag dryer.		
			,
В.			•
1.	Basis for Allowable Emissions Code:		
2.	Future Effective Date of Allowable Emissions:		
3.	Requested Allowable Emissions and Units:		
4.	Equivalent Allowable Emissions:	lb/hour	tons/year
5.	Method of Compliance (limit to 60 characters)		
6.	Pollutant Allowable Emissions Comment (Desc (limit to 200 characters):	c. of Related	Operating Method/Mode)

Emissions	Unit	Information	Section	1	οf	4
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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: SO2	
2. Total Percent Efficiency of Control:	%
3. Potential Emissions: 11.7	lb/hour 18.2 tons/year
4. Synthetically Limited? [x] Yes	[] No
5. Range of Estimated Fugitive/Other Emi	issions:
[]1 []2 []3 _	to tons/yr
6. Emission Factor: 142 (S) lb	n/1000 gal
Reference: AP-42	•
7. Emissions Method Code:	
[]0 []1 []2	[x]3 []4 []5
8. Calculation of Emissions (limit to 600 cl	haracters):
410.6 gal/hr x 142(0.2) lb/1000 gal = 11.7 ll	b/hr; 11.7 lb/hr x 3,120 hr/yr x ton/2000 lb = 18.2 TPY
	,
•	
9. Pollutant Potential/Estimated Emissions	Comment (limit to 200 characters):
Slag dryer is limited to 3,120 hours per yea	ır.

	<u>wable Emissions (Pollutant identified on fro</u>	nt page	
A .			
1.	Basis for Allowable Emissions Code:		
2.	Future Effective Date of Allowable Emissions		
3.	Requested Allowable Emissions and Units:		.,
4.	Equivalent Allowable Emissions:	lb/hour	tons/year
5.	Method of Compliance (limit to 60 characters)):	
6.	Pollutant Allowable Emissions Comment (Des (limit to 200 characters):	c. of Related Oper	ating Method/Mode)
В.			
1.	Basis for Allowable Emissions Code:		
	<u> </u>		
2.	Future Effective Date of Allowable Emissions		
	Future Effective Date of Allowable Emissions Requested Allowable Emissions and Units:		·
3.		lb/hour	tons/year
 3. 4. 	Requested Allowable Emissions and Units:	lb/hour	tons/year

Emissions Unit Information Section ___ 1 __ of ___ 4

Emissions	Unit	Information	Section	1	of	4	
	~	A + TREATH FO TE	~~~~~~		V.		

H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: NOx
2. Total Percent Efficiency of Control: %
3. Potential Emissions: 8.21 lb/hour 12.8 tons/year
4. Synthetically Limited? [x] Yes [] No
5. Range of Estimated Fugitive/Other Emissions:
[]1 []2 []3totons/yr
6. Emission Factor: 20 lb/1000 gal
Reference: AP-42
7. Emissions Method Code:
[]0 []1 []2 [x]3 []4 []5
8. Calculation of Emissions (limit to 600 characters):
410.6 gal/hr x 20 lb/1000 gal = 8.21 lb/hr; 8.21 lb/hr x 3,120 hr/yr x ton/2000 lb = 12.8 TPY
9. Pollutant Potential/Estimated Emissions Comment (limit to 200 characters):
Slag dryer is limited to 3,120 hours per year.

Allo A.	wable Emissions (Pollutant identified on front	page)	
1.	Basis for Allowable Emissions Code:		
2.	Future Effective Date of Allowable Emissions:		
3.	Requested Allowable Emissions and Units:		
4.	Equivalent Allowable Emissions:	lb/hour	tons/year
5.	Method of Compliance (limit to 60 characters):		·
6.	Pollutant Allowable Emissions Comment (Desc. (limit to 200 characters):	of Related Operating	Method/Mode)
В.			
1.	Basis for Allowable Emissions Code:		
2.	Future Effective Date of Allowable Emissions:		
3.	Requested Allowable Emissions and Units:		
4.	Equivalent Allowable Emissions:	lb/hour	tons/year
5.	Method of Compliance (limit to 60 characters):		-

Emissions Unit Information Section ____ of ___ 4

Emissions Unit Information Section	1	of	4	
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H. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION (Regulated Emissions Units Only - Emissions Limited Pollutants Only)

Pollutant Detail Information:

1. Pollutant Emitted: CO		
2. Total Percent Efficiency	of Control:	%
3. Potential Emissions:	2.1 lb/hour	3.2 tons/year
4. Synthetically Limited?	[x] Yes [] No	
5. Range of Estimated Fug	itive/Other Emissions:	
[]1 []2	[] 3	to tons/yr
6. Emission Factor:	5 lb/1000 gal	
Reference: AP-42		
7. Emissions Method Code	»:	
[]0 []1	[]2 [x]3	[]4 []5
8. Calculation of Emissions 410.6 gal/hr x 5 lb/1000		,120 hr/yr x ton/2000 lb = 3.2 TPY
9. Pollutant Potential/Estim Slag dryer is limited to 3,12	ated Emissions Comment (l	imit to 200 characters):

Allowable Emissions (Pollutant identified on	of 4 front page)	Carbon Monoxide
A.		-
1. Basis for Allowable Emissions Code:		
2. Future Effective Date of Allowable Emission	ons:	
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 characte	ers):	,
6. Pollutant Allowable Emissions Comment (I (limit to 200 characters):	Desc. of Related Opera	ting Method/Mode)
В.		,
1. Basis for Allowable Emissions Code:		·
2. Future Effective Date of Allowable Emission	ons:	
3. Requested Allowable Emissions and Units:		
4. Equivalent Allowable Emissions:	lb/hour	tons/year
5. Method of Compliance (limit to 60 charact	ers):	
6. Pollutant Allowable Emissions Comment (I (limit to 200 characters):	Desc. of Related Opera	ting Method/Mode)

Emissions Unit Information Section	1	of	4
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I. VISIBLE EMISSIONS INFORMATION (Regulated Emissions Units Only)

<u>Visib</u>	le Emissions Limitations: Visible Emissions Limitation 1 of 2
1.	Visible Emissions Subtype: VE20
2.	Basis for Allowable Opacity: [x] Rule [] Other
3.	Requested Allowable Opacity Normal Conditions: 20 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4.	Method of Compliance: EPA Method 9
5.	Visible Emissions Comment (limit to 200 characters): Rule 62-296.320(4)(b) - Applicable to Slag Dryer and Storage and Conveying System.
Visib	le Emissions Limitations: Visible Emissions Limitation 2 of 2 Visible Emissions Subtype: VE10
2.	Basis for Allowable Opacity: [x] Rule [] Other
3.	Requested Allowable Opacity Normal Conditions: 10 % Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour
4.	Method of Compliance: EPA Method 9
5.	Visible Emissions Comment (limit to 200 characters): 40 CFR 60, Subpart F, Section 60.62(c) - Applicable to Conveyor Transfer Points.
1	

Emissions	Unit Information S	Section	1	of	4

J. CONTINUOUS MONITOR INFORMATION (Regulated Emissions Units Only)

Cont	tinuous Monitoring System Continuou	is Monitor of
1.	Parameter Code:	2. Pollutant(s):
3.	CMS Requirement: [] Rule []	Other
4.	Monitor Information: Monitor Manufacturer: Model Number:	Serial Number:
5.	Installation Date:	
6.	Performance Specification Test Date:	
7.	Continuous Monitor Comment (limit to	200 characters):
Cont	inuous Monitoring System Continuou	s Monitor of
. I .	Parameter Code:	2. Pollutant(s):
3.	CMS Requirement: [] Rule []	Other
4.	Monitor Information: Monitor Manufacturer: Model Number:	Serial Number:
5.	Installation Date:	
6.	Performance Specification Test Date:	
7.	Continuous Monitor Comment (limit to	200 characters):

K. PREVENTION OF SIGNIFICANT DETERIORATION (PSD) INCREMENT TRACKING INFORMATION

(Regulated and Unregulated Emissions Units)

PSD Increment Consumption Determination

1. Increment Consuming for Particulate Matter or Sulfur Dioxide?

If the emissions unit addressed in this section emits particulate matter or sulfur dioxide, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for particulate matter or sulfur dioxide. Check the first statement, if any, that applies and skip remaining statements

sta	tem	ents.
[x]	The emissions unit is undergoing PSD review as part of this application, or has undergone PSD review previously, for particulate matter or sulfur dioxide. If so, emissions unit consumes increment.
[]	The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after January 6, 1975. If so, baseline emissions are zero, and the emissions unit consumes increment.
[]	The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after January 6, 1975, but before December 27, 1977. If so, baseline emissions are zero, and the emissions unit consumes increment.
[]	For any facility, the emissions unit began (or will begin) initial operation after December 27, 1977. If so, baseline emissions are zero, and emissions unit consumes increment.
[]	None of the above apply. If so, the baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

2. Increment Consuming for Nitrogen Dioxide?

If the emissions unit addressed in this section emits nitrogen oxides, answer the following series of questions to make a preliminary determination as to whether or not the emissions unit consumes PSD increment for nitrogen dioxide. Check first statement, if any, that applies and skip remaining statements.

- [] The emissions unit addressed in this section is undergoing PSD review as part of this application, or has undergone PSD review previously, for nitrogen dioxide. If so, emissions unit consumes increment.
- [] The facility addressed in this application is classified as an EPA major source pursuant to paragraph (c) of the definition of "major source of air pollution" in Chapter 62-213, F.A.C., and the emissions unit addressed in this section commenced (or will commence) construction after February 8, 1988. If so, baseline emissions are zero, and the source consumes increment.
- [] The facility addressed in this application is classified as an EPA major source and the emissions unit began initial operation after February 8, 1988, but before March 28, 1988. If so, baseline emissions are zero, and the source consumes increment.
- [x] For any facility, the emissions unit began (or will begin) initial operation after March 28, 1988. If so, baseline emissions are zero, and the emissions unit consumes increment.
- [] None of the above apply. If so, baseline emissions of the emissions unit are nonzero. In such case, additional analysis, beyond the scope of this application, is needed to determine whether changes in emissions have occurred (or will occur) after the baseline date that may consume or expand increment.

3.	Increment Consuming/EPM SO2 NO2	expanding Code: [x] C [x] C [x] C	[[[]E]E]E	[] Unknown [] Unknown [] Unknown
4.	Baseline Emissions: PM SO ₂ NO ₂	o lb/hour o lb/hour		0 0 0	tons/year tons/year tons/year
5.	PSD Comment (limit to	200 characters):			

33

11/27/96

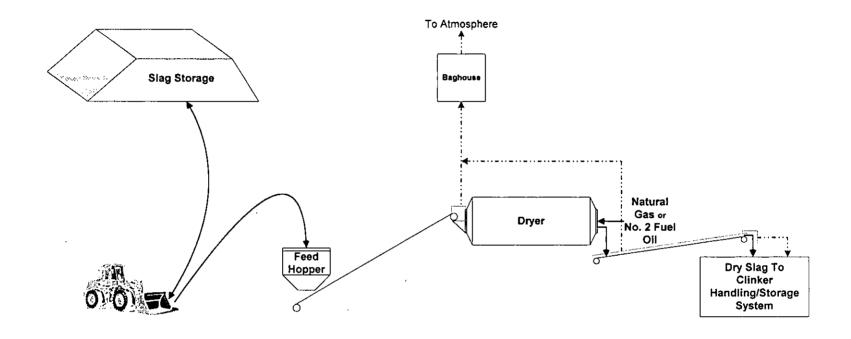
L. EMISSIONS UNIT SUPPLEMENTAL INFORMATION (Regulated Emissions Units Only)

Supplemental Requirements for All Applications

1.	Process Flow Diagram
	[X] Attached, Document ID: Att. A, Fig 2-3 [] Not Applicable [] Waiver Requested
2.	Fuel Analysis or Specification
	[x] Attached, Document ID: Attachment A [] Not Applicable [] Waiver Requested
3.	Detailed Description of Control Equipment
	[X] Attached, Document ID: _Attachment A [] Not Applicable
4.	Description of Stack Sampling Facilities
	[] Attached, Document ID: [x] Not Applicable [] Waiver Requested
5.	Compliance Test Report
	[] Attached, Document ID: [x] Not Applicable [] Previously Submitted, Date:
6.	Procedures for Startup and Shutdown
	[] Attached, Document ID: [X] Not Applicable
7.	Operation and Maintenance Plan
	[] Attached, Document ID: [X] Not Applicable
8.	Supplemental Information for Construction Permit Application
	[X] Attached, Document ID: Attachment A [] Not Applicable
9.	Other Information Required by Rule or Statute
	[] Attached, Document ID: [x] Not Applicable

Additional Supplemental Requirements for Category I Applications Only

10.	Alı	tern	native Methods of Operation
	[]	Attached, Document ID: [x] Not Applicable
11.	Alı	tern	native Modes of Operation (Emissions Trading)
	[]	Attached, Document ID: [x] Not Applicable
12.	Ide	enti	fication of Additional Applicable Requirements
	[]	Attached, Document ID: [x] Not Applicable
13.	Со	mp	liance Assurance Monitoring Plan
	[].	Attached, Document ID: [x] Not Applicable
14.	Ac	id I	Rain Permit Application (Hard Copy Required)
	[]	Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID:
	[]	Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID:
	[]	New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID:
	[]	Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID:
	[x]	Not Applicable

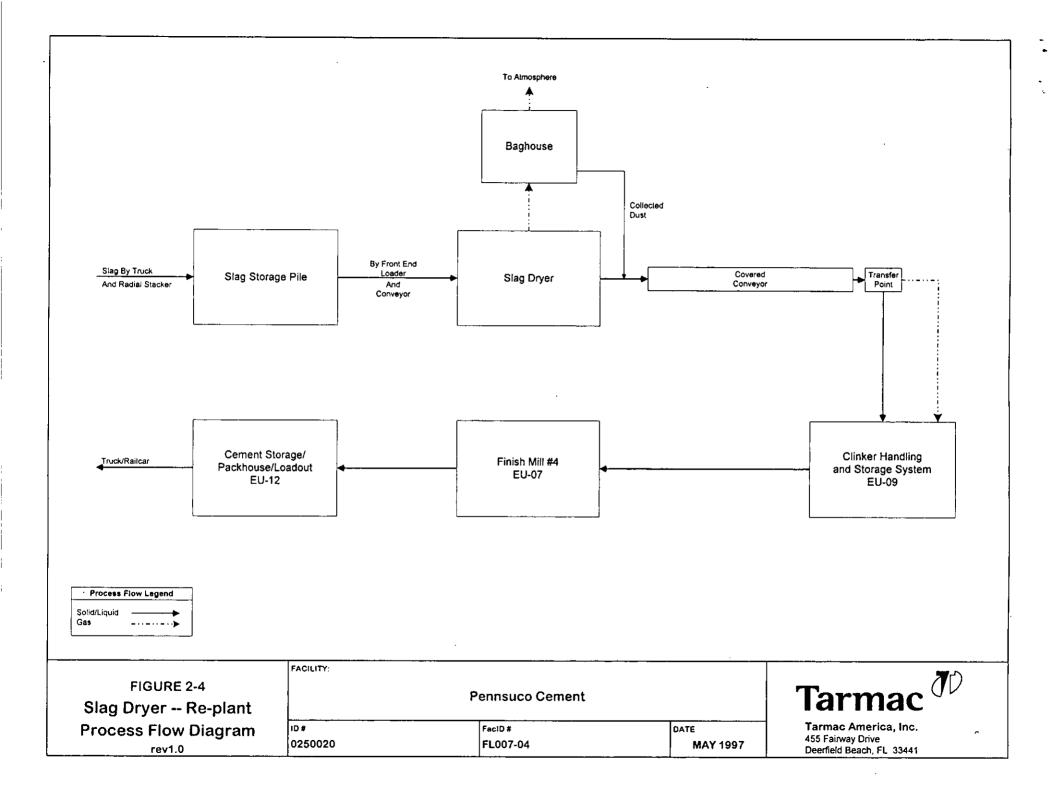


Solid/Liquid Gas

FIGURE 2-3
Slag Dryer -- Re-plant
Process Flow Diagram
rev1.0

Tarmac

Tarmac America, Inc. 455 Fairway Drive Deerfield Beach, FL 33441



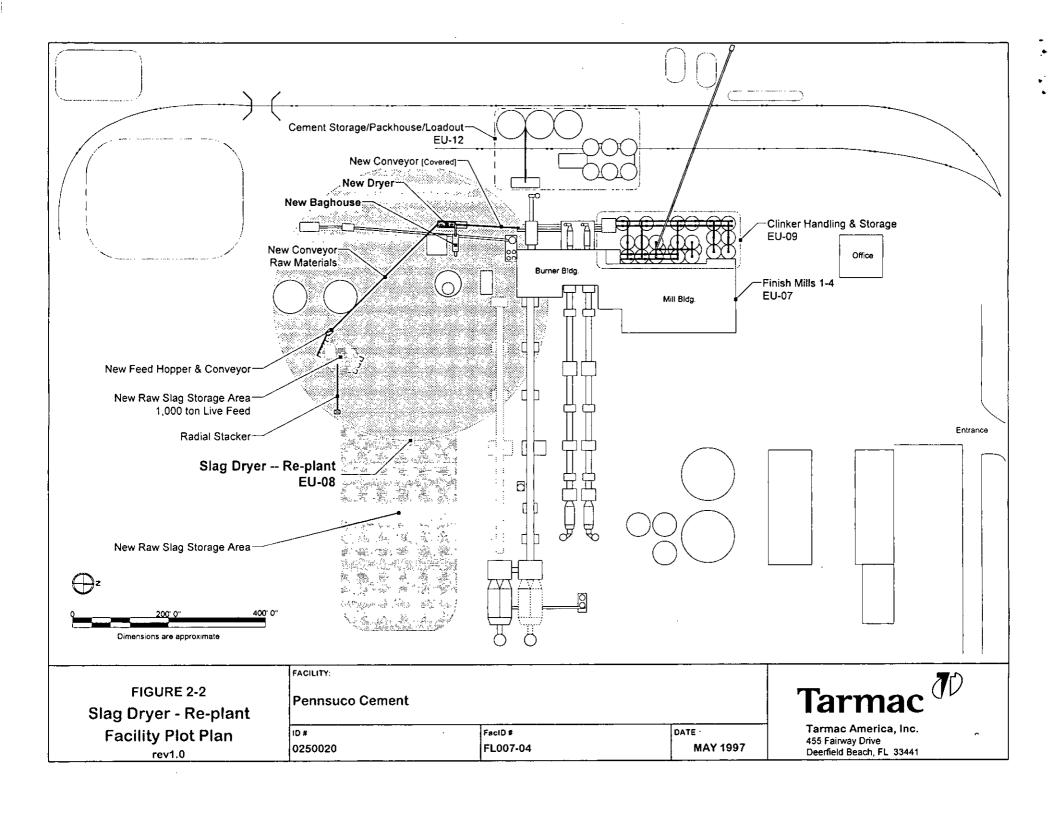


Table 3-4. Future Maximum Particulate Emissions From Affected Point Sources, Tarmac America, Inc. (Revised 5/12/97)

				Maximum					
		Emission	Control	Process	Air Flow				
Application		Point	Equipment	Rate	Rate	PM/PM10 Emission	PM	/PM10 Emission	ons
Unit ID	Emission Unit/Point	ID	Туре	(TPH)	(cfm)	Factor	(lb/hr)	(hr/yr)a	(TPY)
EU 1	Slag Dryer	SLAG	Baghouse	125	27,820(a)	0.04 gr/dscf	9.54	3,120	14.88
EU 2	Clinker Handling System No. 3								
	Conveyor/Bucket Elevator	K-347	Baghouse	125	5,000	0.01 gr/acf	0.43	8,760	1.88
	Conveyor/Bucket Elevator	K-447	Baghouse	125	5,000	0.01 gr/acf	0.43	8,760	1.88
EU 2	Clinker Storage Silos								
	Clinker silos 21, 22, 23, 26, 27 & 28	K-633	Baghouse	212.5	1,500	0.01 gr/acf	0.13	8,760	0.56
EU 3	Finish Mill #4								
	Ball mill/mill sweep	F-430	Baghouse	150	30,000	0.01 gr/acf	2.57	8,760	11.26
	Belt conveyor/separator/cement pump	F-432	Baghouse	150	17,000	0.01 gr/acf	1.46	8,760	6.38
	Clinker/gypsum conveyors	F-603	Baghouse	150	8,000	0.01 gr/acf	0.69	8,760	3.00
	Clinker/gypsum conveyors	F-604	Baghouse	150	8,000	0.01 gr/acf	0.69	8,760	3.00
	Clinker/gypsum conveyors	F-605	Baghouse	150	4,000	0.01 gr/acf	0.34	8,760	1.50
EU 4	Cement Storage Silos 1-9								
	Cement Silos 7-9	F-512	Baghouse	150	10,000	0.01 gr/acf	0.86	8,760	3.75
EU 4	Bulk Cement Loadout Units 1 & 2								
	Railcar/Truck Unit 1	B-110	Baghouse	300	3,000	0.01 gr/acf	0.26	8,760	1.13
	Truck Unit 2	B-210	Baghouse	300	3,000	0.01 gr/acf	0.26	8,760	1.13
TOTAL	•						8.10		50.36

Notes:

⁽a) Airflow reflects dscfm.

Table 4-1. Emissions Increase Associated With Slag Project, Tarmac America, Inc. (Revised 5/12/97)

	_		Affected Point			
	(A)	(B)	(C)	(A-B+C)	PSD	
	Fugitives From	Current	Future	Net Increase	Significant	PSD
	Slag Handling	Actuals	Maximums	In Emissions	Emission Rate	Review
Regulated Pollutant	(TPY)	(TPY)	(TPY)	(TPY)	(TPY)	Applies?
Particulate matter (TSP)	1.78	11.70	50.36	40.4	25	Yes
Particulate matter (PM10)	0.62	11.70	50.36	39.3	15	Yes
Sulfur dioxide			18.19	18.19	40	No
Nitrogen oxides			12.81	12.81	40	No
Carbon monoxide			3.20	3.20	1 00	No
Volatile organic compounds			0.34	0.34	40	No
Sulfuric acid mist			0.08	0.08	7	No
Total reduced sulfur					10	No
Lead			2.7E-04	2.7E-04	0.6	No
Mercury			2.2E-04	2.2E-04	0.1	No
Beryllium			0.0E + 00	0.0E + 00	4.0E-04	No
Fluorides					3	No
Asbestos					0.007	No
Vinyl Chloride					1	No

Certified-RRR Z 784 757 154

April 11, 1997

(954) 481-2800 Fax (954) 421-0296

Tarmac America, inc. 455 Fairway Drive Deerfield Beach, FL 33441^o

Environmental Department Direct line (954.425.4190) Direct fax (954.480.9352)

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

Re: Pennsuco Cement Plant -AP

Dade County

File No. 0250020-001-AC

Dear Mr. Linero:

Please find enclosed the affidavit of publication for the *Notice of Intent to Issue Permit* for the slag dryer at the above named facility. Tarmac will await permit issuance subsequent to the required public comment period. Thank you.

Sincerely,

Allison Taylor

Real Estate/Environmental Asst.

allism Taylor

enc

C:\OFFICE\WPWIN\DOCS\ENV\SLAGNOI.WPD

CC: W. Hanks, BAR O. Rouff, P.E. 5 ED Nade Co NDS RECEIVED

APR 21 1997

BUREAU OF AIR REGULATION

MIAMI DAILY BUSINESS REVIEW

Published Daily except Saturday, Sunday and Legal Holldays Miaml, Dade County, Florida.

STATE OF FLORIDA COUNTY OF DADE:

Before the undersigned authority personally appeared Sookie Williams, who on oath says that she is the Vice President of Legal Advertising of the Miami Delly Business Review this Miami Review, a daily (except Saturday, Sunday and Legal Holldays) newspaper, published at Miami in Dade County, Florida; that the attached copy of advertisement, being a Legal Advertisement of Notice in the matter of

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT DRAFT PERMIT NO. 0250020-001-AC/PSD-FL-236 TARMAC PENNSUCO SLAG DRYING OPERATION DADE COUNTY

in the XXXXX Court, was published in said newspaper in the issues of Mar 26, 1997

Afflant further says that the said Miami Daily Business Review is a newspaper published at Miami in said Dade County, Florida, and that the said newspaper has heretofore been continuously published in said Dade County, Florida, each day (except Saturday, Sunday and Legal Holldays) 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 attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said

26 Sworn to and subscribed before me this,

AY PUD

OF FLOW

(SEAL)
Sookie Williams person

OFFICIAL NOTARY SEAL JANETT LLERENA Me-COMMISSION NUMBER

CC566004 MY COMMISSION EXPIRES JUNE 23,2000

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION DRAFT PERMIT NO. 0250020-001AC/PSD-FL-236 TARMAC PENNSUCO SLAG DRYING OPERATION DADE COUNTY

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit to Tarmac America, Inc., 455 Fairway Drive, Deerfield Beach, Florida 33441, for the Tarmac Pennsuco plant located at 11000 NW 121 Way, Medley, Dade County, Florida, 33178. The permit will authorize the construction of a new blast furnace stag drying operation to replace the one permitted on October 27, 1995. A Best Available Control Technology (BACT) determination was required for particulate matter (PM/PM10) pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD).

The proposed project consists of 125 tons per hour (TPH) blast furnace slag dryer and baghouse. The dryer will use natural gas and No. 2 fuel oil from a new 10,000 gallon storage tank as fuels. Particulate matter emissions from the dryer and dryer conveyor will be controlled with baghouses. 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) of blast furnace slag. The product will be shipped for use as a raw material at concrete batch plants.

Emissions of pollutants from the slag drying operation are estimated to be 43.6 TPY of particulate matter (PM/PM10), 18.2 TPY of sulfur dioxide, 12.8 TPY of nitrogen oxides, 3.2 TPY of carbon monoxide, and less than 1 TPY of volatile organic compounds. Particulate controllimited by use of fabric filters and reasonable precautions.

An air quality impact analysis was not conducted because the increase in emissions is less than 50 TPY for each pollutant. Emissions from the facility will consume PSD increment but will not significantly contribute to or cause a violation of any state or federal ambient air quality standards.

The Department will issue the FINAL Permit, in accordance with the conditions of the DRAFT Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments and requests for public meetings concerning the proposed DRAFT Permit issuance action for a period of 30 (thirty) days from the date of publication of this Notice. Written comments and requests for public meetings should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Permit, the Department shall issue a Revised DRAFT. Permit and require, if applicable, another Public Notice.

The Department will issue FINAL Permit with the conditions of the DRAFT Permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.559 and 120.57 F.S. or a party requests mediation as an alternative remedy under Section 120.573 before the deadline for filing a petition. Choosing mediation will not adversely affect the right to a hearing if mediation does not result in a settlement. The procedures for petitioning for a hearing are set forth below, followed by the procedures for requesting mediation.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57 F.S. The petition must contain the information set forth below and must be filled (received) in the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, telephone: 904/488-9370, fax: 904/487-4938. Petitions

must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition (or a request for mediation, as discussed below) within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition must contain the following information: (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the 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 that the petitioner contends warrant reversal or modification of the Department's action or proposed action; (f) A statement identifying the rules or statutes that the petitioner contends require 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 that the petitioner wants the Department to take with respect to intent.

Because the administrative hearing process is designed to formulate final agency action, the filling of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A person whose substantial interests are affected by the Department's proposed permitting decision, may elect to pursue mediation by asking all parties to the proceeding to agree to such mediation and by filing with the Department a request for mediation and the written agreement of all such parties to mediate the dispute. The request and agreement must be filed in (received by) the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000, by the same deadline as set forth above for the filing of a petition.

A request for mediation must contain the following information: (a) The name, address, and telephone number of the person requesting mediation and that person's representative, if any; (b) A statement of the preliminary agency action; (c) A statement of the relief sought; and (d) Either an explanation of how the requester's substantial interests

will be affected by the action or proposed action addressed in this notice of intent or a statement clearly identifying the petition for hearing that the requester has already filed, and incorporating it by reference.

The agreement to mediate must include the following: (a) The names, addresses, and telephone numbers of any persons who may attend the mediation; (b) The name, address, and telephone number of the mediator selected by the parties, or a provision for selecting a mediator within a specified time; (c) The agreed allocation of the costs and fees associated with the mediation; (d) The agreement of the parties on the confidentiality of discussions and documents introduced during mediation; (c) The date, time, and place of the first mediation session, or a deadline for holding the first session, if no mediator has yet been chosen; (f) The name of each party's representative who shall have authority to settle or recommend settlement; and (g) The signatures of all parties or their authorized representatives.

As provided in Section 120.573 F.S., the timely agreement of all parties to mediate will toll the time limitations imposed by Sections 120.569 and 120.57 F.S. for requesting and holding an administrative hearing. Unless otherwise agreed by the parties, the mediation must be concluded within sixty days of the execution of the agreement. If mediation results in settlement of the administrative dispute, the Department must enter a final order incorporating the agreement of the parties. Persons whose substantial interests will be affected by such modified final decision of the Department have a right to petition for a hearing only in accordance with the requirements for such petitions set forth above. If mediation terminates without settlement of the dispute, the Department shall notify all parties in writing that the administrative hearing processes under Sections 120.569 and 120.57 F.S. remain available for disposition of the dispute, and the notice will specify the deadlines that then will apply for challenging the agency action and electing remedies under those two statutes.

A complete project file 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 "	Department of	
Environmental Protection .	Environmental Protection	Dade County DERM
Bureau of Air Regulation (1)	Southeast District	Penthouse 2
111 S. Magnolia Orive, Sute 4	400 North Congress Avenue	33 S.W. 2nd Avenue
Tallahassee, Flonda 32301	West Palm Beach, Florida 33419-5425	Miemi, Florida 33130 ,
Telephone: 904/488-1344.	Telephone: 561/681-6790	Telephone: 305/372-6925
Fax: 904/922-6979	Fax: 561/681-6755	Fex: 305/372-6954

The complete project file includes the application, technical evaluations, draft permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 904/488-1344, for additional information.

AL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

4APT-ARB

APR 0 3 1997

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

SUBJ: Tarmac America, Inc., Medley, Florida (PSD-FL-236)

Dear Mr. Fancy:

This is to acknowledge receipt of the preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the above referenced facility submitted by your March 3, 1997, letter. The proposed major modification at Tarmac's existing portland cement plant consists of the installation of a new dryer and dry slag conveying system to allow the processing of up to 300,000 tons per year of blast furnace slag from iron foundries. After being dried in the new dryer, the slag will be processed by use of the existing No. 4 finishing mill, clinker silos, cement silos, and loading system. The product will be shipped for use as a raw material at concrete batch plants. Based on the Best Available Control Technology (BACT) analysis, PM emissions from the new dryer and conveyor system will be controlled with fabric filters. The maximum PM emission rate from the slag dryer will be limited to 0.02 gr/dscf or 10 percent opacity. The maximum PM emission rate for the conveyor system will be 0.01 gr/acf or 5 percent opacity. The new slag conveying system will be subject to 40 CFR Part 60, Subpart F - Standards of Performance for Portland Cement Plants. We have reviewed the preliminary determination and draft permit and have no adverse comments.

Thank you for the opportunity to review and comment on the draft permit and supporting information. If you have any questions regarding our review, please contact Mr. Keith Goff of my staff at (404)562-9137.

RECEIVED (h

APR 07 1997

BUREAU OF AIR REGULATION

ce: w. Hanks, BAR

D. Buff, G.A.

R. Douglas Neeley

Sincerely yours,

Chief

Air and Radiation Technology Branch Air, Pesticides, and Toxics Management Division

NP5

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