



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

MAY 30 1988

REF: 4AH-AF

Mr. Joe Allen
Lonestar Florida/Pennsuco, Inc.
411 West Putnam Avenue
Greenwich, Connecticut 06830

Re: Proposed Fuel Conversion
Kilns and Addition of Coal
Handling System
PSD-FL-050

Dear Mr. Allen:

EPA Region IV has reviewed your application to convert the type of fuel used in the kilns at your plant under the provisions of Prevention of Significant Deterioration Regulations (40 CFR 52.21) and has made a preliminary determination of approval with conditions. Please find enclosed two copies of the Preliminary Determination.

A public notice will be run in the near future in a local newspaper, the Miami Herald. A copy of the summary and your application will be open to the public review and comment for a period of 30 days. The public can also request a public hearing to review and discuss specific issues. At the end of this period, EPA will evaluate the comments received and make a final determination regarding the proposed construction.

Should you have questions regarding this information, please contact Mr. Kent Williams of my staff at 404/881-4552 or Mr. Jeffrey L. Shumaker of TRW Inc. at 919/541-9100. TRW is under contract to EPA and its personnel are acting as authorized representatives of the Agency in providing aid to the Region IV PSD program.

Sincerely yours,

Tommie A. Gibbs, Chief
Air Facilities Branch

TAG:JLS:jt

Enclosure

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO.
ACTION DATE

1. TO: (NAME, OFFICE, LOCATION)

RAHEL

STARNES

INITIAL
DATE

2.

BLOMIEL

THOMAS

INITIAL
DATE

3.

BARKER

GEORGE

INITIAL
DATE

4.

Hodge

INITIAL
DATE

REMARKS:

- 1) Advise on review Engineer of Thomas
- 2) File. Lincoln

- INFORMATION
- REVIEW & COMMENT
 - REVIEW & FILE
 - REVIEW & FORWARD
 - INFORMATION
 - REVIEW & COMMENT
 - REVIEW & COMMENT
 - FOR BY INFORMATION
 - FOR YOUR INFORMATION
 - FOR ACTION
 - FOR INFORMATION & FILE
 - REVIEW & FORWARD
 - FOR ACTION
 - FOR INFORMATION
 - FOR ACTION
 - FOR ACTION
 - FOR ACTION

FROM:

STEVE SMALLWOOD

Smallwood

DATE: 6-9-68



PM
5-4-89
Atlanta, GA

file copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4APT-APB-cdw

MAY 8 1989

Mr. Scott Quaas
Environmental Specialist
Tarmac Florida, Inc.
P.O. Box 2998
Hialeah, Florida 33012

RECEIVED

MAY 11 1989

DER-BAQM

Re: Lonestar/Tarmac, Florida Cement, Inc.
Pennsuco Cement Production Plant (PSD-FL-050)

Dear Mr. Quaas:

This is to confirm the recent telephone conversation with Mark Armentrout of my staff regarding your March 22, 1989, letter to me which contained emission test data for Pennsuco Cement Plant's No. 3 kiln.

As you recall, Mr. Armentrout reiterated that PSD regulations require that net emission increases (or decreases) be determined by obtaining the difference in new allowable emission rates and either old actual emissions or old allowable emissions, whichever is lower. In this case, the current allowable emission rates and the old actual emission data contained in your March 22 were used. According to our calculations, particulate matter (PM), sulfur dioxide (SO₂), and nitrogen oxides (NO_x) will be subject to a PSD review.

EPA will consider modifying the permit to allow burning of petroleum contaminated soil if the current allowable emission rates for these pollutants are lowered such that the significance levels are not exceeded, thus avoiding a PSD review. However, it appears that a PSD review will be required for benzene, since it is unlikely that the kiln will be capable of destructing 100 percent of the benzene contained in the petroleum contaminated soil.

By copy of this letter we are notifying the Florida Department of Environmental Regulation of this matter.

If you have any comments or questions, please feel free to contact me or Mr. Armentrout of my staff at (404) 347-2864.

Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

copied: L. Brooks, SE Dir.
P. Strong, OERM
CHF/BT

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

AIR-4

Mr. C.H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Dept. of Environ. Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400



U.S. OFFICIAL MAIL

PENALTY
FOR
PRIVATE
USE \$300
P.B. METER
6250488


U.S. POSTAGE

0.25



SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. Restricted Delivery
 †(Extra charge)† †(Extra charge)†

3. Article Addressed to: Mr. Albert W. Townsend Group Manager, Real Estate & Environmental Tarmac Florida, Inc. 455 Fairway Drive Hillsboro Executive Center North Deerfield Beach, FL 33441	4. Article Number P 702 175 483 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid) 
6. Signature - Agent X <i>John Self</i>	
7. Date of Delivery <i>05-18-88</i>	

PS Form 3811, Mar. 1987 * U.S.G.P.O. 1987-178-288 **DOMESTIC RETURN RECEIPT**

P 702 175 483
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

Send to Albert W. Townsend, Group Mgr. Tarmac Florida, Inc. Street and No. 455 Fairway Drive P.O., State and ZIP Code Hillsboro Executive Ctr. N. Deerfield Beach, FL 33441	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

PS Form 3800, June 1985
 Postmark or Date Mailed: 05/13/88
 Permit: Kiln No. 3 Fuel Mod.



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345 COURTLAND STREET
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4APT-APB-cdw

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Sincerely yours,

Bruce P. Miller

Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

cc: Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

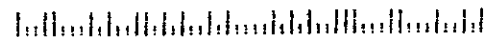
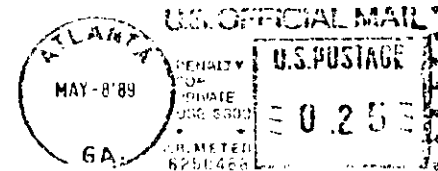
Handwritten notes:
1. Dishes of Soil
4. Soil CEM
2. F / BT

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA, GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

AIR-4

Mr. C.H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Dept. of Environ. Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400





Tarmac

TARMAC FLORIDA, INC.

P.O. Box 2998
Hialeah, Florida 33012

March 22, 1989

RECEIVED

APR 3 1989

DER - BAQM

Mr. Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division
U.S. Environmental Protection Agency
345 Courtland Street
Atlanta, Georgia 30365

RE: Tarmac Florida, Inc.
Pennsuco Cement Production Plant
PSD-FL-050

Dear Mr. Miller:

I have reviewed your January 19, 1989 letter addressed to Ms. Stephanie Brooks of the Florida Department of Environmental Regulation (FDER) regarding the proposed burning of petroleum-contaminated soils at the referenced facility. Tarmac has requested the FDER to modify our State operation permit to allow the burning of petroleum contaminated soils in Kiln No. 3 at the production plant. While all correspondence to the FDER regarding the proposed trial burns of the soils were copied to EPA-Region IV, no request for PSD permit modification was anticipated as there was no reason to believe that allowable emission rates for regulated pollutants would be exceeded. The compliance test conducted August 8, 1989 confirmed that belief. Tarmac, therefore, was somewhat surprised by receipt of your January 19th letter, and your determination a PSD review would be required for PM and SO₂ based on calculations that net emissions increase of those pollutants exceeded their respective significance levels.

Tarmac believes the use of only three (3) compliance tests to determine the "actual emissions" as defined by PSD regulations, one of which did not include PM testing, does not provide a representative measure of normal source operation. Because compliance tests at the Pennsuco production facility are normally conducted only once per year, a two-year period does not provide

Mr. Bruce P. Miller, Chief
Air Programs Branch
U.S. EPA - Region IV
March 22, 1989

-Page Two-

a representative sampling of source specific emissions. Tarmac respectfully requests that a different time period be used for the PSD review determination. The attached sheet *Kiln #3 Compliance Emission Test Data* provides test data for the facility since the last PSD permit revision requested in 1982. The average of the data for these tests were subtracted from the actual emissions during the August 1988 test conducted using contaminated soils. The results from calculations of the "recent actual" minus the "old actual" in tons per year are below the significance levels for the respective pollutants. Accordingly, no PSD review should be required for the facility to burn petroleum contaminated soils at the rate tested during the August 1988 trial burn.

Tarmac would appreciate your review of the above and the enclosed emission data and advising me as to your final decision concerning PSD applicability. Should you or your staff require additional information or have any questions please do not hesitate to call me at (305)823-8800.

Sincerely,



Scott Quaas
Environmental Specialist

cc: A. Townsend - Tarmac, Corporate
D. Stotts - Peoples, Earl & Blank
C. Fancy - FDER, Tallahassee
S. Brooks - FDER, W. Palm Beach



Tarmac

Kiln #3 Compliance Emission Test Data

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*****
*       TARMAC FLORIDA, INC.       *
* AIR EMISSION SOURCE INVENTORY *
*****

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Test Date	Clinker Produced	Kiln Feed	TSP	TSP Allowable ¹	SO2	SO2 Allowable ²	NOx	NOx Allowable ³
03/18/83	90.4	138.8	12.17	41.64	160.49	415.84	NA	NA
03/05/84	89.2	137.0	20.08	41.10	748.30*	410.32	NA	NA
05/16/85	87.5	133.0	26.27	39.90	495.95*	400.00	749.15*	592.00
05/31/85	87.6	132.8	16.81	39.84	388.58	400.00	681.42*	592.00
08/30/85	86.7	133.0	19.90	39.90	380.50	398.82	581.04	586.95
12/18/86	85.3	133.5	15.33	40.05	164.29	392.40	657.55*	577.50
04/28/87	85.9	130.7	NA	NA	288.42	395.14	417.22	581.54
12/22/87	87.4	133.1	18.62	39.93	364.14	402.04	504.44	591.69
07/05/88	85.1	133.5	<u>12.62</u>	39.91	<u>323.88</u>	391.46	<u>454.30</u>	576.12

* not used in average

AVERAGE > [17.73] [295.76] [489.25]

! Test with
! contaminated
! soil.
!

! 08/09/88 86.4 132.9 [22.92] 39.87 [281.06] 397.44 [474.37] 584.92 !

RECENT ACTUAL
- OLD ACTUAL

(LBS/HR) > [5.19] [-14.70] [-14.88]

(TPY)⁴ > [20.34] [-57.61] [-58.31]

¹ permit limit -- 0.3 lb/ton of dry feed to kiln
² permit limit -- 4.60 lb/ton of clinker produced
³ permit limit -- 6.77 lb/ton of clinker produced
⁴ based on average operating hours 1983-1988 = 7838 hours