



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 28 1984

REF: 4AW-AM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

REC'D
DEP
JAN 7 1985
BAQM

Mr. Albert W. Townsend, Manager
Real Estate and Environmental Affairs
Lonestar Florida Pennsuco Inc.
P. O. Box 122035 - PVS
Hialeah, Florida 33012

RE: PSD-FL-050, Lonestar Florida/Pennsuco, Inc.

Dear Mr. Townsend:

This office has reviewed your March 23, 1984, request for a revision of the above referenced PSD permit for cement kiln Nos. 1, 2, and 3, at your Hialeah, Florida, facility. In accordance with the Florida Department of Environmental Regulation final determination dated November 9, 1984, we hereby revise your federal PSD permit (PSD-FL-050) issued on July 8, 1980, as outlined below.

I. Specific Conditions 4, 5, and 6 are changed as follows:

4. Emissions of sulfur dioxide from Nos. 1 and 2 kilns shall not exceed 125.0 pounds per hour from each kiln at the maximum operating rate of 25 tons per hour of clinker produced per kiln. At lesser operating rates, the emissions of sulfur dioxide shall not exceed 5.0 pounds per ton of clinker produced. ✓
5. Emissions of sulfur dioxide from No. 3 kiln shall not exceed 400 pounds per hour at the maximum operating rate of 87.5 tons per hour of clinker produced. At lesser operating rates, the emissions of sulfur dioxide shall not exceed 4.6 pounds per ton of clinker produced. ✓
6. The coal used to fuel kilns Nos. 1, 2, and 3 shall have a sulfur content of less than 1.75 percent (monthly average) and a 2.0 percent maximum; or the sulfur content, determined once by the stack test program described below, that consistently meets the revised sulfur dioxide emission standards, whichever sulfur content is most restrictive. ✓

II. TEST PROGRAM

In establishing the maximum sulfur content of the coal that can be used in each kiln, the Company shall conduct a test series on the kilns while they are operating near maximum production.

The test series shall consist of a minimum of three separate compliance tests, each test at least 168 hours after the preceding test, and using fuel with a constant (\pm 0.25 percent) sulfur content. All test results for coal of this sulfur content must be below the BACT standards.

If test results show the SO₂ emissions from a kiln do not meet the BACT standard, then the Company shall reduce the sulfur content of the coal burned in this kiln by at least 0.25 percent (average) and repeat the test series until the emissions consistently comply with the revised BACT standards.

The Company shall maintain a record of these test results for review during subsequent inspections.

In addition, for each test sample, the Company shall measure or estimate and record the following parameters:

- a. feed rate (TPH);
- b. sulfur content of feed;
- c. coal rate (TPH);
- d. sulfur content of coal; and
- e. oxygen content of flue gas

III. Specific Conditions 13 and 14 are hereby added as follows:

13. Only two kilns will be operated with coal as fuel at the same time. The Company shall maintain a log or logs that show(s), as a minimum: the operational status of all three kilns at any time; when each kiln is placed in service; the clinker, feed, and fuel feed rates to each kiln; and when the kiln is taken out of service.

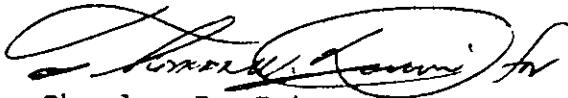
14. Continuous oxygen monitors shall be properly installed, operated and maintained on kilns 1 and 2 after their conversion to coal firing and on kiln 3. The monitors shall be certified and calibrated in accordance with 40 CFR §60, Appendix B, Performance Specification 3. A record of excess oxygen for each of the coal-fired kilns and fuel/raw feed sulfur input shall be maintained on the premises for viewing during subsequent compliance inspections.

*Extra
condition*

The PSD permit revisions contained herein are effective as of the date of issuance of this letter and become a binding part of Federal PSD permit PSD-FL-050 issued on July 8 1980, unless a written objection is received at the above address within ten (10) days after receipt of this letter. Please be advised that the terms and conditions specified in the original July 8, 1980, federal PSD permit are still in force and effect, except as outlined above. Notice of this revised permit will be published in the Federal Register in the near future. In addition, please be advised that this revised permit does not preclude obtaining valid state and local permits for this coal conversion project.

If you have any questions regarding this matter, please feel free to contact Mr. James T. Wilburn, Chief, Air Management Branch, at 404/881-3043.

Sincerely yours,



Charles R. Jeter
Regional Administrator

cc: Mr. C. H. Fancy, P.E., Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental
Regulation

4AW-AM

DEC 17 1982
Mr. Scott Quaas, Environmental/Specialist
Lonestar Florida/Pennsuco, Inc.
Cement and Aggregate Division
Post Office Box 122035
Palm Village Station
Hialeah, Florida 33012

Dear Mr. QUAAAS:

This is in response to your November 19, 1982, submittal to Mr. Thomas W. Devine concerning the sulfur dioxide (SO₂) emission limitations on Lonestar's Kilns 1, 2, and 3 and a request for revising these limitations from those appearing in your present PSD permit (PSL-FL-050).

Since the State of Florida has been granted partial delegation of authority regarding PSD reviews, we have forwarded a copy of this submittal to them. Florida will be responsible for performing the technical review and preparing a preliminary determination. Following this determination, Florida will initiate a public notice and 30-day comment period. EPA will also be afforded an opportunity to review and comment on this determination. A final determination on your permit revision request will be made after the conclusion of the public comment period.

If you have any questions or comments concerning this matter, please contact Mr. Richard S. DuBoise, Chief, Air Engineering Section at (404) 881-7654.

Sincerely yours,

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

cc: Mr. Clair Fancy, Deputy Bureau Chief
FL Dept. of Environmental Regulation

Mr. Anthony J. Clemente, P.E., Acting Director
Metropolitan Dade County Dept. of Environmental Resources

Mr. Warren G. Strahm, Subdistrict Manager
FL Dept. of Environmental Regulation



United States Department of the Interior

NATIONAL PARK SERVICE
SCIENCE PUBLICATIONS OFFICE

75 Spring Street, S.W.
Atlanta, Georgia 30303

IN REPLY REFER TO:

N3615(475)

SEP 25 1984

DER

Mr. C. H. Fancy, P.E.
Deputy Bureau Chief
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

SEP 28 1984

BAQM

Dear Mr. Fancy:

Thank you for sending us information regarding your preliminary approval of Lonestar Florida Pennsuco's (Lonestar) permit modification request. As we understand it, Lonestar was granted a permit in 1980 for the fuel conversion of three existing kilns from gas/oil firing to coal firing, but is now requesting an increase in the allowable sulfur dioxide (SO₂) limit. The Lonestar facilities, which are located in Hialeah, Florida, are 30 kilometers northeast of Everglades National Park, a mandatory class I area.

You indicate that original stack tests performed, while the kilns were firing oil, show that 91.3 percent of the potential SO₂ was absorbed by the aggregate processed in kilns 1 and 2, and 98.7 percent in kiln 3. The emission limitations for the fuel conversion permit were based on these data. Actual stack test data for coal firing indicate that the observed SO₂ removal is only approximately 75 percent. Consequently, Lonestar is requesting the SO₂ allowable limit in their permit be increased by 1,688 tons per year.

In the information you provided, there was little discussion regarding the large discrepancy in the test data (75 percent versus 98.7 percent). We would like to know if the difference is attributable entirely to the fuel change, if the coal-fired tests were properly conducted and were representative of normal operation, and if the kilns were being operated in the same manner as when the oil-fired tests were performed.

We note that the predicted SO₂ concentrations in Everglades National Park were made assuming a zero micrograms per cubic meter (ug/m³) background concentration. Using this assumption, Lonestar predicts an annual SO₂ concentration of 0.4 ug/m³ in the park. Although we do not expect this concentration to have an adverse impact on park resources, please note for future permits that SO₂ monitoring has been done in the park, and these data indicate that background levels, although low, are not zero ug/m³. Future permits should include the background concentrations in any impact discussion.

Handwritten notes:
We are...
Actual...
mean was 7.0g/m

The applicant asserts that "Lonestar and Dade County Resource Recovery were determined to be the only significant increment consuming sources in the area." This implies that an analysis was performed to define some impact area. This analysis should be included in the application.

If you have any questions regarding this matter, please contact Mark Scruggs of our Air and Water Quality Division at (303) 234-6620.

Sincerely,

C. W. Ogle

Acting Regional Director
Southeast Region

10-2-84

Clara,

I went over Park letter
and Tom Trubbs comments
with Scott Quince of Co.
He is going to respond
to 3rd of Paul Service
letter and, also, propose a
state first program. We need
to wait for his reply. And



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

AUG 29 1984

REF: 4AW-AM

Mr. C. H. Fancy, P.E.,
Deputy Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

SEP 4 1984

RE: PSD-FL-050, Lonestar Florida Pennsuco, Inc.

Dear Mr. Fancy:

This is to acknowledge receipt of your letter of transmittal dated August 6, 1984, regarding the preliminary determination for the sulfur dioxide BACT and PSD permit revisions for the above company's cement kilns.

We have reviewed the proposal and concur with your determination on the revised BACT for sulfur dioxide and the modification of permit conditions for sulfur dioxide. Please advise us and submit a copy of the final determination when it is issued.

It is our understanding that once the final determination is issued by your agency, EPA will issue a permit modification for the above referenced facility and incorporate it as part of the original PSD permit issued on July 8, 1980. If this procedure deviates from your understanding, please let us know.

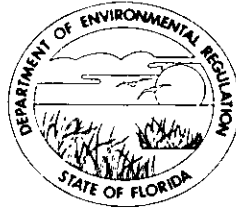
Sincerely yours,

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

Waste from the day

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

July 30, 1984

Mr. Scott Quaas
Environmental Specialist
Lonestar Florida Pennsuco, Inc.
P. O. Box 122035 - PVS
Hialeah, Florida 33012

Dear Mr. Quaas:

The department acknowledges receipt of your July 3, 1984, request for an alternate particulate emission test procedure for the No. 3 kiln. In order to give consideration to all factors that may influence our decision on this matter, we request you furnish the following additional information.

1. What are the physical constraints that prevent your Company from relocating the stack gas monitor that was installed in the NW sampling port?
2. What would it cost to install another test port in the stack? Please document this cost if you believe it is prohibitive.
3. Please provide sketches (elevation and plan) of the stack that includes the test ports and shows the restriction caused by the stack gas monitor that was installed in one of the test ports.
4. Please provide copies of stack test data field sheets that show the pitot tube readings at each test point before and after the kiln was converted to coal fuel.
5. If the data is available, please provide the particle size distribution of the particulate matter in the emissions for kiln 3 when it is firing coal.

Mr. Scott Quaas
Page Two
July 30, 1984

We will resume processing your request for an alternate test procedure as soon as we receive the information requested above. If you have any questions on this matter, please write to me or call Willard Hanks at (904)488-1344.

Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/WH/s

cc: T. Tittle

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION
INTEROFFICE MEMORANDUM

For Routing To District Offices And/Or To Other Than The Addressee		
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
To: _____	Loctn.: _____	
From: _____	Date: _____	
Reply Optional []	Reply Required []	Info. Only []
Date Due: _____	Date Due: _____	

TO: Tom Tittle SE District
Patrick Wong DERM

FROM: Ed Palagyi EP

DATE: JUNE 18, 1984

SUBJ: BACT DRAFT- Lonestar F1 Pennsuco

Enclosed is a preliminary BACT for Lonestar. Please review upon receipt if all possible. If you have any comments, changes, or revisions please call me at Sun Com 278-1344.

The goal is to get the finished document to EPA before July 1. A quick reply would be greatly appreciated:

attachment:

cc: Cleve Holladay /
Willard Hanks



LONESTAR FLORIDA PENNSUCO, INC.

Cement & Aggregate Plant
11000 N. W. 121 Way
Medley, Florida 33178
P. O. Box 122035 - PVS
Hialeah, Florida 33012
(305) 823-8800

May 22, 1984

DER
MAY 29 1984
BAQM

Mr. Clair Fancy, Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Re: PSD-FL-050

Dear Mr. Fancy:

With regard to my recent SO₂ emission limitation revision request, could you please advise me of the status of your review and/or whether additional information is needed. As this matter has been under review for over one (1) year we are anxious to bring it to a final conclusion.

Please contact me as soon as possible.

Sincerely,

Scott Quaas
Environmental Specialist

We will draft a
BACT in order to trigger
the

We will continue
processing your
request to revise
the federal PSD
permit and plan
to have a draft
preliminary determination
by June, 1984.

Until ~~the~~ ^{you} most recent
revision we have
been unable to issue
the permit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 11 1984

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

REF: 4AW-AM

Mr. Scott Quaas
Lonestar Florida Pennsuco, Inc.
P. O. Box 122035 - PVS
Hialeah, Florida 33012

RE: PSD-FL-050 Lonestar Florida Pennsuco, Inc.

DER
APR 16 1984
BAQM

Dear Mr. Quaas:

This is to acknowledge receipt of your March 23, 1984, letter concerning revisions to the SO₂ emission limitations for kilns 1, 2, and 3 as contained in the above referenced PSD permit. This request supersedes your November 19, 1982, request for revisions to the SO₂ emission limitations for the kilns and will be considered in lieu of the previous submittal.

In our letter to you dated December 17, 1982, you were informed that the Florida Department of Environmental Regulation (DER) would be responsible for performing the technical review of that request for revising the SO₂ emission limitations for the kilns. We will, therefore, proceed in the same manner with this request as we have in the past. The Florida DER will prepare a preliminary determination. Following this determination, Florida will initiate a public notice and 30-day comment period. EPA will also be afforded an opportunity to review and comment on this determination. A final determination on your permit revision request will be made after the conclusion of the public comment period.

If you have any questions or comments concerning this matter, please contact Mr. Wayne J. Aronson, Team Leader, New Source Review Team at (404) 881-7654.

Sincerely yours,

James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

cc: Mr. Clair Fancy, Deputy Bureau Chief
FL Dept. of Environmental Regulation

Mr. Anthony J. Clemente, P.E., Director
Metropolitan Dade County Dept. of Environmental Resources

Mr. Roy Duke, District Manager
FL Dept. of Environmental Regulation



LONESTAR FLORIDA PENNSUCO, INC.

Cement & Aggregate Plant
11000 N. W. 121 Way
Medley, Florida 33178
P. O. Box 122035 - PVS
Hialeah, Florida 33012
(305) 823-8800

March 23, 1984

Mr. James Wilburn, Chief
Air Management Branch
Environmental Protection Agency - Region IV
345 Courtland Street
Atlanta, Georgia 30365

DER
MAR 27 1984
BAQM

Re: Request for Revision of Coal Conversion Permit #PSD-FL-050

Dear Mr. Wilburn,

In our revision submittal dated November 19, 1982, Lonestar requested a change to the SO₂ emission limiting standards in the above PSD permit as follows:

Kiln 1	100 lbs/hr
Kiln 2	100 lbs/hr
Kiln 3	400 lbs/hr

You advised me on December 17, 1982 that the Florida Department of Environmental Regulation (FDER) would be responsible for performing the technical review and preparing a determination. Subsequently, Lonestar has submitted additional information to both the state and county regulatory agencies, as requested by those agencies, to clarify remaining issues. Additionally, it was our understanding that the State intended to approve our revision request.

However, in a letter dated December 28, 1983, the FDER advised Lonestar of a change in their interpretation of the Dade County short-term SO₂ standard and the comparison of modeling concentrations to that short-term standard.

*Some modeling as before
only w/ different scenarios*

Mr. James Wilburn
 March 23, 1984
 Page Two

The FDER indicated they must compare the predicted highest concentrations at each receptor site to Dade County standards not the second-highest concentrations as used in state and federal regulations. When the modeling submitted by Lonestar was re-evaluated, a violation of the 4-hour Dade County SO₂ standard was predicted.

In view of this recent interpretation, Lonestar has completed a revised air modeling evaluation of three emission scenarios to determine maximum predicted concentrations when the kilns are burning either coal or natural gas. The fuels burned and associated maximum SO₂ emissions for each of the kilns are as follows:

		Maximum SO ₂ emissions (lbs/hr), and fuel burned.			
Emission Scenarios		Kiln 1	Kiln 2	Kiln 3	TOTAL
<i>Only 2 kilns can burn coal at the same time</i>	1	<u>125</u> (coal)	9 (natural gas)	400 (coal)	525
	2	9 (natural gas)	<u>125</u> (coal)	400 (coal)	525
	3	<u>125</u> (coal)	<u>125</u> (coal)	off - line	250

Attached is a summary of maximum SO₂ concentrations predicted for each scenario due to Lonestar and other nearby sources. The supportive computer model printouts will be forwarded under separate cover. As the air dispersion modeling results depict, Lonestar may operate Kiln 1, Kiln 2 and Kiln 3 under any of the three emission scenarios modeled and will comply, as before, with Federal and State Ambient Air Quality Standards (AAQS), and also comply with the Dade County AAQS as currently interpreted.

Lonestar respectively requests that our emission limiting standards be revised to reflect the emissions outlined in the above three scenarios. As this matter has been under review for one year, we believe an expeditious conclusion of our permit revision request is now warranted.

$$\text{Max Increase } SO_2 = \frac{525 \text{ lb}}{\text{hr}} \times \frac{8760 \text{ hr}}{\text{yr}} \times \frac{\text{Ton}}{2000 \text{ lb}} = 2300 \text{ TPY}$$

Mr. James Wilburn
March 23, 1984
Page Three

Re: Request for Revision of Coal Conversion Permit #PSD-FL-050

Should you need any further information from me, please don't hesitate to call.

Sincerely,



Scott Quaas
Environmental Specialist

SQ:elvy

cc: S. Smallwood - DER, Tallahassee ✓
A. Clemente - Dade County DERM
R. Duke - DER, West Palm Beach
B. Voshell - EPA
C. D. Coppinger
R. F. Scully
A. Townsend

file

Summary of Maximum Sulfur Dioxide Concentrations
Due to Lonestar and Other Nearby Sources

SO₂ Concentrations (ug/m³)*
for Averaging Periods of :

Scenario	Annual	24-hour		4-Hour Highest	3-hour		
		Highest	Highest, Second Highest		Highest, Second Highest	1-hour Highest	
<u>1-Kiln #1 and Kiln #3 on coal, Kiln #2 on gas</u>							
Total-All Sources	2.4	15.7	13.4	52.7	52.3	127.2	
Lonestar contribution	---	14.3	13.4	52.4	52.0	127.2	
<u>2-Kiln #2 and Kiln #3 on coal, Kiln #1 on gas</u>							
Total-All Sources	2.5	16.2	14.0	54.2	53.5	128.0	
Lonestar contribution	---	14.7	14.0	53.9	53.2	128.0	
<u>3-Kiln #1 and Kiln #2 on coal, Kiln #3 off-line</u>							
Total-All Sources	2.2	15.4	13.2	50.4	46.2	101.6	
Lonestar contribution	---	15.4	12.4	50.4	45.8	100.4	
Dade County AAQS	8.6	28.6	NA	57.2	NA	286	
Florida AAQS	60	NA	260	NA	1300	NA	

Note: NA = Not Applicable

*Highest 1-, -4, and 24-hour concentrations are compared to Dade County AAQS, which are not to be exceeded. Highest, second-highest 3- and 24-hour concentrations are compared to Florida AAQS, which are not to be exceeded more than once per year.

Source: ESE, 1984



Wayne Arcenson *Called 1/18/84*
404-881-7654 *C/love*

R.H. Fancy
FYT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Patt Wong

REGION IV

Blomel is dead

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4AW-AM

FEB 17 1984

Mr. Steve Smallwood, P.E., Chief
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

DER
BAQM

Dear Mr. Smallwood:

The purpose of this letter is to provide you with the Environmental Protection Agency's (EPA) comments on the present sources in violation of the air pollution requirements in the State of Florida. In your letter to me dated August 30, 1983, you indicated that acceptable Delayed Compliance Orders (DCO) would be issued to Boise Cascade and Arnold Cellophane within two (2) or three (3) months, respectively, of the date of the aforementioned letter.

We understand that your agency has had problems resolving the legal and technical issues involved in issuing their DCO's. However, since the meeting between the Florida Department of Environmental Regulation (FDER) and EPA staffs on January 19, 1984, we feel that FDER has sufficient information to issue an acceptable DCO. To date, FDER has not submitted an acceptable DCO on the aforementioned sources or Continental Can. Therefore, if an acceptable DCO is not issued by March 16, 1984, to Boise Cascade, Arnold Cellophane, and Continental Can, EPA will initiate independent federal enforcement action. Please submit to EPA copies of all the DCO's and keep EPA informed of any subsequent actions resulting from the issuance of the DCO's.

In your August 30, 1983, letter you indicated that a preliminary determination for the federal PSD permit modification would be issued to Lonestar Pennsoco around September 15, 1983. To date it has not been submitted. It is our understanding that the difference in interpretation of the ambient standards between Dade County and the State of Florida has now been resolved and that a new permit can be issued within the next 30 days. Therefore, if the federal permit modification has not been issued by March 16, 1984, EPA will initiate independent federal enforcement action. Please submit the technical information necessary to support the issuance of the PSD Permit modification.

2/23
See me on this -
Alan

Need one paragraph input for Bill B. on this. Need to get out where this statement came from.

one of small units on natural gas

It is our understanding, based upon a telephone conversation on February 6, 1984, between Mr. Bill Voshell of my staff and Mrs. Cynthia Christen, Assistant General Counsel for the State of Florida, that a Consent Order in reference to Ciba-Geigy was signed on January 23, 1984, and that subsequently a permit was issued. Please submit to EPA a copy of the Consent Order and a copy of the permit for our records.

Since receipt of your letter dated August 30, 1983, EPA has not received any further information regarding the Orlando Utilities Commission (OUC) Indian River - Unit No. 2. Please provide EPA with any agreements, commitments, requirements, or mechanisms by which FDER is to bring OUC into compliance. If EPA is not informed by March 16, 1984, EPA will issue a Section 114 letter requesting OUC to test for particulate emissions.

It has come to my attention that an Administrative Order was issued to Yorke-Doliner on November 16, 1983, by FDER. Please submit to EPA a copy of the Administrative Order by March 1, 1984, and keep EPA informed of any subsequent action resulting from issuance of the order. In addition, please provide copies of any future Administrative Orders that are issued by FDER.

Should you have any questions regarding this letter, please feel free to contact me at (404) 881-3043 or Mr. Bert Cole, Acting Chief, Southern Compliance Unit at (404) 881-4298.

Sincerely yours,

James T. Wilburn
James T. Wilburn, Chief
Air Management Branch
Air and Waste Management Division

cc: William Blommel
Environmental Administrator
Florida Department of Environmental Regulation

Bill Voshell ^{the one to talk to}
Both permits same-state & federal
Southern Compliance Unit

*Within 60 days
Significant violators list*

Send information on technical justification
The federal permit ~~on federal per~~ of federal permit.

Then mention that if issued now federal permit would be ~~less~~ greater than than state.

Of want can be same in next two months

Make SCU make choice
Do they want us to ~~see~~ issue federal permit