



METROPOLITAN DADE COUNTY - FLORIDA

909 S.E. First Avenue
Brickell Plaza, Building - Rm. 402
Miami, Florida 33131
Telephone: 579-2760

ENVIRONMENTAL RESOURCES MANAGEMENT

May 13, 1980

DSR-WPB	Copy <input checked="" type="checkbox"/> Action A	Route #
MI	DIR	DATE
SO2	DIR	DATE
FLD	DIR	DATE
FA	DIR	DATE
REMARKS:		

REC
MAY 11 1980
SAQM

Warren G. Strahm, P.E.
Subdistrict Manager
Department of Environmental Regulation
P.O. Box 3858
West Palm Beach, Florida 33402

Reference: Application for Permits to Modify Three (3) Cement Kilns
and Construct Coal Handling and Grinding Facility

Applicant: Lonestar Florida Pennsuko, Inc.

Location: 11000 N.W. 121 Street, Hialeah, Florida

Dear Mr. Strahm:

The referenced application has been reviewed with regards to the requirements of Chapters 17-2 and 17-4 of the Rules of the State of Florida Department of Environmental Regulation and Chapter 24, Dade County Pollution Control Ordinance. We offer no objections to the issuance of a construction permit for the aforementioned facility provided that the following comments are addressed satisfactorily or included as permit provisos:

1. Due to the increase in sulfur emissions associated with the proposed modification, the impact on Dade County's ambient SO₂ standards has to be addressed. According to an April, 1980 pollutant dispersion modeling study prepared by Environmental Science & Engineering, Inc., the maximum predicted SO₂ concentrations associated with kilns #1,2,& 3 fuel conversion are below Dade County ambient standards. However, the maximum four-hour interaction concentration with Alton Box Board Co., a manufacturing facility located approximately 7.5 kilometers southeast of the applicant, is projected to be 82.72 ug/m³, exceeding the Chapter 24 standard of 57.2 ug/m³. Since Alton Box Board is depicted to exceed the four-hour standard individually and Lonestar's emissions are apparently insignificant (< 5ug/m³) at the interaction receptor location, it is felt the applicant's proposed modification should not be denied on the basis of sulfur dioxide emissions. It is recommended that Alton Box Board demonstrate a SO₂ emissions reduction prior to the renewal of its permit.

RECEIVED
MAY 22 1980

Dept. of Environmental Reg.
West Palm Beach

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP		ACTION NO.	
		ACTION DUE DATE	
1. TO: (NAME, OFFICE, LOCATION)	DER / TALLAHASSEE	INITIAL	
	C. Holladay - BAQM	DATE	
2.		INITIAL	
		DATE	
3.	DER	INITIAL	
		DATE	
4.	OCT 11 1983	INITIAL	
		DATE	
REMARKS: <p style="text-align: center;">BAQM</p> <p>F4I as requested.</p> <p>I'm not too sure if this will help as it refers only to the <u>previously</u> approved SO₂ emission limits (BACT). As discussed w/ Larry George, we should consider FAC rule 17-2.500(d) which implies modeling only changes of lower emissions (since baseline data) to determine user of significant impact (?). The existing violation would still have to be addressed by anyone whose facility significantly impacted a violation (Alton Box, Lancaster (others?)). This may be a conflict in the rule ^(and previously proposed rule) whereby we would be allowing an insignificant increase at a "known point of violation" but requiring the same facility to decrease the same pollutants at the facility through enforcement.</p>		INFORMATION	
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		INITIAL & FORWARD	
		DISPOSITION	
		REVIEW & RESPOND	
		PREPARE RESPONSE	
		FOR MY SIGNATURE	
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		LET'S DISCUSS	
		SET UP MEETING	
		INVESTIGATE & REPT	
		INITIAL & FORWARD	
		DISTRIBUTE	
CONCURRENCE			
FOR PROCESSING			
INITIAL & RETURN			
FROM:		DATE	10/7/83
Tom Little		PHONE	
DER / WPB			