



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

March 5, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Scott Quaas, Environmental Manager
Tarmac America, Inc.
455 Fairway Drive
Deerfield Beach, Florida 33441

Re: Permit Application for Kiln No. 2 Indirect Firing Modification (0250020-007-AC)

Dear Mr. Quaas:

The Department's Bureau of Air Regulation in Tallahassee will be processing Tarmac's application to install a pulverized coal bin with associated transfer equipment and a baghouse for the conversion of Kiln No. 2 to indirect firing.

According to the agreement between Metro-Dade DERM and Tarmac, the BACT limits in permit AC 13-169901 (PSD-FL-142) will apply when the indirect firing retrofit project has been completed. Therefore, there is no need to do another BACT determination and the emission limits will be the same as before. An event that would trigger a PSD application and a new BACT determination would be a modification such as a production increase resulting in PSD-significant increases in emissions. The new coal bin baghouse emissions will be well below PSD-significant levels.

Since the expiration date of AC 13-169901 has passed, the new construction permit should encompass the entire Kiln No. 2 operation (i.e., more than just the new coal bin and baghouse) so that performance tests are required to demonstrate compliance after the retrofit is done. This means that the application must show complete pollutant information and should contain more drawings and a detailed description of the work to be performed. We note a minor error in the calculation of emissions on page III. Part 9b-1 field 8 (3.94 lb/hour should be 0.94 lb/hour). Amendments to the Title V permit will be required as well. As far as the fee is concerned, it is sufficient for the new baghouse emission increase (less than five tons per year) and since we are not requiring a new BACT review there is no need for a higher fee.

Processing of the application will be continued upon receipt of the requested information. If any further input is required we will advise you by March 17. If there are any further questions, please contact me or John Reynolds at 850/488-1344.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

AAL/JR

- c: I. Goldman, SED
- B. Beals, EPA
- D. Buff, Golder Assoc.

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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