TITAN AMERICA

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July 21, 2011

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United States Environmental Protection Agency, Region 4
Air, Pesticides, and Toxic Management Division
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

VIA CERTIFIED U.S. MAIL, No. (USEPA, FDEP & DERM)

Re: Submittal of §63.10(d) (5) Periodic Startup, Shutdown, and Malfunction Report
Tarmac America LLC, Medley, FL

In accordance with the provisions of 40 CFR Part 63.10(d) (5) (i), **Tarmac America, LLC** is submitting this periodic *Startup, Shutdown, and Malfunction Report* for the **Pennsuco** Complex.

Reports are only required if a startup, shutdown, or malfunction (SSM) occurred during the reporting period. This report also includes a summary of the startup and shutdown events where the SSM Plan was not followed, and an exceedance of the relevant standard occurred. In the event of such occurrences, Tarmac America, LLC submitted to your office within seven working days after the end of the event when the SSM Plan was *not* followed.

By signing this letter, I certify that, having been duly authorized by Tarmac America, LLC, VP Cement & Agg. Operations, I am a responsible official as that term is defined in 40 CFR 63.2. I further certify, based on reasonable inquiry, that the enclosed Startup, Shutdown, and Malfunction Report is to the best of my knowledge and belief true, accurate, and complete.

Muhammad Khan, E.I.
Environmental Engineer

Kevin Baird
VP Cement & Agg. Operations

PERIODIC SSM Report

Actions taken in response to startup and shutdown events during the reporting period were consistent with those outlined in the facility's SSM Plan, with the exception of those startup and shutdown events where the SSM plan was not followed and an exceedance of the relevant standard occurred. Startup and shutdown events where the SSM Plan **was *not*** followed and an exceedance of the relevant standard occurred are none.

PERIODIC SSM Report

Actions taken in response to malfunction event during this reporting period were consistent with those outlined in the facility's SSM Plan, with the exception of the following events. Malfunction events where the SSM Plan **was *not*** followed and excess emissions occurred are listed below:

TABLE 2. MALFUNCTIONS WHERE SSM PLAN NOT FOLLOWED

Date	Emission Unit Number/ Description	Duration	Reasons for Not Following SSM Plan	Exceedances
3/9/2011	EU 028	6 Minutes	Coal Mill Start up	Opacity 33.1 %
3/9/2011	EU 028	6 Minutes	Coal Mill Start up	Opacity 36.4 %
3/21/2011	EU 028	6 Minutes	Coal Mill Start up	Opacity 11.2 %
04/02/2011	EU 028	6 Minutes	Adjust O2 for the Coal Mill	Opacity 13.85%
05/20/2011	EU 028	6 Minutes	Coal Mill Startup caused the Opacity	Opacity 30.15%
05/30/2011	EU 028	6 Minutes	Coal Mill Startup caused the Opacity	Opacity 29.81%
05/30/2011	EU 028	6 Minutes	Adjust O2 for the Coal Mill	Opacity 10.36%

PERIODIC SSM Report

Malfunction events during this reporting period where the SSM Plan **was** followed and excess emissions occurred are none.

TABLE 3. MALFUNCTIONS WHERE SSM PLAN NOT FOLLOWED

Date	Emission Unit Number/ Description	Duration	Reasons for Exceedances	Exceedances
3/7/2011	EU 028	24 Hr Avg	Kiln Shutdown due to maintenance	NOx 830.012 (lbs/hr)
05/31/2011	EU 028	6 Minutes	Kiln Shutdown	Opacity 15.86 %

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Re: *Submittal of §63.10(e) (3) (vi) Summary Report and §63.10(e) (3) (i) Excess Emissions and CMS Performance Report*
Tarmac America LLC – Pennsuco Complex - Medley, Florida

In accordance with the provisions of 40 CFR Part 63.10(e)(3), Tarmac America, LLC. is submitting this summary report for the Pennsuco facility. This report covers the period Jan 1st through June 30th , 2011. Certain affected facilities were subject to NSPS Subpart F through June 13, 2002 after which they were no longer applicable to NSPS Subpart F. On an after June 14, 2002, these affected sources became subject to the reporting requirements under NESHAP Subpart LLL, which requires submission of a semi-annual summary report.

SUMMARY REPORT – GASEOUS AND OPACITY EXCESS EMISSIONS AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Name and address (physical location) of the source:
Tarmac America, LLC
11000 NW 121st Way
Medley, Florida 33178

Hazardous Air Pollutants monitored at the source:
- Opacity, as a surrogate for metal HAPs
- Temperature, as a surrogate for dioxin/furan emissions

Description of the process units:
The primary affected source at the facility is the kiln, which is use to produce clinker by heating limestone and other materials for subsequent production of Portland Cement. Emissions from the kiln are controlled by a baghouse and exhausted through the main stack. Clinker from the kiln is sent through a clinker cooler, which is controlled by the main baghouse before exhausting to the atmosphere. There is also several material handling points within the plant that are potential sources of emissions.

Emission and operating parameter limitations specified in standard:
Per the list of relevant standards in Table 1 of 40 CFR 63.1342,
- Main stack exhaust is limited to 0.40 ng TEQ/dscm for dioxin/furan emissions
- Main stack exhaust is limited to 10% opacity on a six-minute block average basis
- All other exhausts are limited to 5% opacity on a six-minute block average basis

Other Required Information:

The Continuous Opacity Monitor System (COMs) manufacturer and model information are:

Location	Emission Unit Number	Model Number	Serial Number
Main Stack	EU 028	Durag DR-290AW	410705

The Continuous Opacity Monitor System (COMS) certifications for the main stack were performed October 10, 2006.

ADDITIONAL INFORMATION REQUIRED BY NESHAP SUBPART LLL

Per 40 CFR 63.1354(b)(9), TARMAC AMERICA, LLC is submitting the following information.

- Exceedances of maximum control device inlet temperature sensors – None
- Failures to calibrate thermocouples – None

- Results of any combustion system components inspections conducted: None

- Failure to comply with any provision of the operations and maintenance plan: Seven (7) incidents discussed in Table 2 of the Periodic Start-up, Shutdown, and Malfunction Report.

Tarmac America, LLC is submitting the startup, shutdown, and malfunction report with this report under separate cover. As noted in §63.10(d) (5) (i), the startup, shutdown, and malfunction report can be submitted simultaneously with the summary report.

By signing this letter, I certify that I am a responsible official as that term is defined in 40 CFR 63.2. I further certify, based on reasonable inquiry that the enclosed report is to the best of my knowledge and belief true, accurate, and complete.

Sincerely,

Muhammad Khan, E.I.
Environmental Engineer

Kevin Baird
VP Cement & Agg. Operations

JAN1 – JUNE 30, 2010 NESHAP SUBPART LLL OPACITY AND CMS REPORTS

Continuous Emission Monitor Report Summary
Thermocouple Excess Emission and Monitoring System Performance

Pollutant:	APCD Temperature
Temperature Limitation:	241.2^{0}F & 421.1^{0}F
Reporting Period:	Jan 1, 2011 through Jun 30, 2011
Company Name:	Tarmac America LLC
Address:	Medley, FL
Process Unit Description:	Main Baghouse (EU 028)
1) Instrument Manufacturer:	Pyco
Instrument Model / ID:	Type K Probe / SO# 20463
Certificate No:	11408
Performance Evaluation:	06/20/2011
Install Date:	06/30/2011
Total Source Operating Time:	117,712 Minutes
Total Minutes in Reporting Period:	260,460 Minutes

CEMS (RFD) Performance Summary

	Duration (1)	**% Unavailable** (2)
1. TC downtime in reporting period due to:		
a. Monitor Equipment Malfunction	0	0
b. Non-Monitor CMS Malfunction	0	0
c. Calibration/QA	60	0.051
d. Other Known Causes	0	0
e. Other Unknown Causes	0	0
2. Total COMS downtime:	**60**	**0.051**

Emission Summary Data

	Duration (1)	**% Excess Emissions** (3)
1. Excess emissions in reporting period due to:		
a. Startup/shutdown	0	0
b. Control Equipment Malfunction	0	0
c. Process Problems	0	0
d. Other Known	0	0
e. Other Unknown	0	0
2. Total duration of excess emissions	**0**	**0.0**

(1) All duration reported in 1-minute periods
(2) % Unavailable is calculated by the following formula:
% Unavailable = CEMS downtime during source operating time/ source operating time * 100
(3) % Excess Emissions is calculated by the following formula:
% Excess Emissions = Total duration of excess emissions/source operating time * 100

Continuous Emission Monitor Report Summary
Opacity Excess Emission and Monitoring System Performance

Pollutant: Particulate Matter
Emission Limitation: 10 %
Reporting Period: January 1 through June 30, 2011
Company Name: Tarmac America LLC
Address: Medley, FL
Process Unit Description: Main Stack (EU 028)
Instrument Manufacturer: Durag
Instrument Model: DR-290AW
Serial Number: 410705
Last Performance Evaluation: 06/20/2011
Total Source Operating Time: 117,712 Minutes
Total Minutes in Reporting Period: 260,460 Minutes

COMS Performance Summary

	Duration (1)	**% Unavailable** (2)
1. COMS downtime in reporting period due to:		
a. Monitor Equipment Malfunction	0	0
b. Non-Monitor COM Malfunction	0	0
c. Calibration/QA	504	0.428
d. Other Known Causes	0	0
e. Other Unknown Causes	0	0
2. Total COMS downtime:	**504**	**0.428**

Emission Summary Data

	Duration (1)	**% Excess Emissions** (3)
1. Excess emissions in reporting period due to:		
a. Startup/shutdown	0	0
b. Control Equipment Malfunction	246	0.209
c. Process Problems	48	0.041
d. Maintenance	66	0.056
e. Other Unknown	0	0
2. Total duration of excess emissions:	**360**	**0.305**

(1) All duration reported in 1-minute periods
(2) % Unavailable is calculated by the following formula:
% Unavailable = CEMS downtime during source operating time/ source operating time * 100
(3) % Excess Emissions is calculated by the following formula:
% Excess Emissions = Total duration of excess emissions/source operating time * 100