

NEW MAILING ADDRESS

TARMAC FLORIDA, INC.

11000 NW 121 Way Miami, Florida 33178

15 April 1991

Mr. Barry Andrews
Bureau of Air Regulation
Fla. Dept. of Environmental Regulation
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE:

Pennsuco Cement & Supply

Kiln No. 3

Application To Modify Permit

Dear Mr. Andrews:

Please find enclosed a check in the amount of \$500.00 as requested for additional fees related to the permit processing of our application submitted for the above facility. Also please note our new mailing address above for all correspondence regarding environmental matters. Should you need anything further please do not hesitate to call me at (305)823-8800.

Sincerely,

Scott Quaas

Environmental Specialist

CC: D. Buff - KBN Engineering



Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400 Lawton Chiles, Governor - Carol M. Browner, Secretary

March 21, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Quaas:

The Bureau of Air Regulation received your application to modify kiln No. 3. A preliminary review indicates that this project is subject to PSD based on a 97.9 TPY increase in NOx emissions. Before further processing can take place, you will need to submit an additional \$500 fee pursuant to 17-4.050(5)(b).

If you have any questions, please contact Barry Andrews at the above address or call (904)488-1344.

Sincerely,

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/kt

cc: A. Townsend

D. Buff

S. Brooks

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Florida Department of Environmental Protection

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

Virginia B. Wetherell Secretary

July 20, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Scott Quaas Tarmac Florida, Inc. 11000 Northwest 121 Way Miami, Florida 33178

Dear Mr. Quaas:

Re.: File No. AC 13-194142, Kiln No. 3 Modification

On April 17, 1991, you submitted an application for permit to decontaminate soil in kiln No. 3 of Tarmac's Portland cement plant. The Department requested additional information on your proposed project in a letter dated May 16, 1991.

As of this date, you have not provided the additional information we requested to evaluate the proposed soil decontamination operation. We request you provide the information or withdraw this application by September 1, 1993. If you do not respond to this request, the Department will assume your plans to decontaminate soil have changed and will deny the permit.

Sincerely,

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

c: I. Goldman, SED

P. Wong, DERM



Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400 Lawton Chiles, Governor Carol M. Browner, Secretary

May 16, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Scott Quaas, Environmental Specialist Tarmac Florida, Inc. 11000 Northwest 121 Way Miami, Florida 33178

Dear Mr. Quaas:

Re: File No. AC 13-194142, Kiln No. 3 Modification

The Department has established a posture and precedent in its permitting of sources to potentially burn tire derived fuel. We require a test burn first for verification of pollutant emissions and then evaluate the results for permitting action. Please advise if this is acceptable; otherwise, the Bureau may not have reasonable assurances under the current application package and may consider recommending denial.

The Department has made a preliminary review of the application for permit to modify kiln No. 3 at your Portland cement plant located at 11000 Northwest 121 Way, Medley, Dade County, Florida 33012. Before this application can be processed, we need the following information:

- Please provide copies of the current permits to operate kiln No. 3 and its cooler.
- 2. Describe how excess dust from the ESP will be removed from the system and disposed of. What precautions will be used to minimize unconfined emissions while handling this dust?
- 3. Will the emissions of any air pollutant from the cooler change as a result of the proposed modification? If so, by how much?
- 4. Please provide a sketch and description of the material handling equipment, including the seals on the kiln, that will be used to feed the tires to the kiln.
- 5. What complete and incomplete products of combustion will be emitted from the burning of tires?
- 6. What currently unregulated pollution will be emitted from tire and soil burning? Provide initial estimates of the maximum emissions of metals, PCDD, PCDFS, polynuclear aromatic



hydrocarbons, benzene, semi-volatile organic compounds, VOC, PCB, dioxins, furans, and TSCA substances from the burning of tires and soil in kiln No. 3. Include a table showing the change from the current actual to new allowable emissions being requested.

- 7. What is the maximum concentrations of these pollutants in the ambient air for 8-hr, 24-hr, and annual average time periods?
- 8. Will the emissions of any air pollutant from the modified kiln cause an exceedance of the no-threat level for a toxic material?
- 9. Why was kiln No. 3 connected to the ESP for kiln No. 4?
- 10. What is the difference between the two ESP units (kiln 3 ESP and kiln 4 ESP)?
- 11. Which ESP was used to obtain the data presented in the application?
- 12. What will be the source of the contaminated soil to be treated in kiln No. 3?
- 13. Will the contaminated soil contain "off-spec" petroleum products or hazardous waste (40 CFR 261.3)?
- 14. What contaminants will be in the soil and what will be the maximum concentration of the contaminant? List all constituents and their CASR number.
- 15. Will the plant meet all the requirements of F.A.C. Chapter 17-775?
- 16. How will the contaminated soil be brought into the plant, stored, transported to the process equipment, and what precautions will be used to minimize unconfined emissions of PM and VOC?
- 17. What is the minimum destruction efficiency by the kiln of the VOC in the soil?
- 18. What temperature, residence time, and percent oxygen will the VOC vapors from the soil be exposed to?
- 19. Please provide plots showing the temperatures and residence times of both solids and gases as they flow through the kiln.

 Note on the plot where the tires and soil will enter the kiln.

Mr. Scott Quaas Page 3 of 3

- 20. Investigate the feasibility of adding the contaminated soil with the tires in the center of the kiln.
- 21. Please make a BACT recommendation for controlling NOx when the kiln is burning fuel oil, tires, and natural gas.
- 22. What is the maximum nitrogen content of the coal, fuel oil, and tires that will be burned in this kiln?
- 23. Please provide a plan and schedule to establish good combustion practice to minimize NOx, CO, and VOC emissions from kiln No. 3.
- 24. What is the cumulative NOx increment consumption on the Everglades Class I area resulting from this project?

We will resume processing the application after the requested information is received. If you have any questions on this matter, please write to me or call Bruce Mitchell (TDF) or Willard Hanks (soil decontamination) at 904-488-1344.

Sincerely,

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/WH/plm

c: S. Brooks, SE Dist.

D. Buff, P.E.

D. Ehlenbeck, BWC

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RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED

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(See Reverse)

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Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400 Lawton Chiles, Governor Carol M. Browner, Secretary

April 24, 1991

Ms. Jewell A. Harper, Chief Air Enforcement Branch U.S. EPA, Region IV 345 Courtland Street, N.E. Atlanta, Georgia 30365

Dear Ms. Harper:

RE: Tarmac Florida, Inc.
Dade County, PSD-FL-175

Enclosed for your review and comment is the above referenced PSD permit application. If you have any comments or questions, please contact Willard Hanks, Barry Andrews or Cleve Holladay at the above address or at (904)488-1344.

Sincerely,

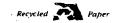
Patricia G. Adams

Planner

Bureau of Air Regulation

/pa

Enclosure





Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400 Lawton Chiles, Governor Carol M. Browner, Secretary

April 24, 1991

Mrs. Christine Shaver, Chief Permit Review and Technical Support Branch National Park Service-Air Quality Division P. O. Box 25287 Denver, Colorado 80225

Dear Mrs. Shaver:

RE: Tarmac Florida, Inc.
Dade County, PSD-FL-175

Enclosed for your review and comments is the above referenced PSD permit application. If you have any comments or questions, please contact Barry Andrews, Willard Hanks, or Cleve Holladay at the above address or at (904)488-1344.

Sincerely,

Patricia G. Adams

Planner

Bureau of Air Regulation

Patricia G. adams

/pa

Enclosure