

METROPOLITAN DADE COUNTY, FLORIDA



Department of Environmental Resources Management
33 S.W. 2nd Avenue
Miami, FL. 33130-1540

SEND TO:

Name: *THERESA HEARN*

Company/Department:

Phone Number:

Fax Number: *850-922-6979*

Message:

THERESA

ATTACHED COPY OF REQUESTED PERMIT

THANKS

EVA

FROM:

Name: *EVA RUNAGA*

Division/Section: *Air Fisheries Section*

Phone Number: *(305) 372-0926*

Fax Number: *(305) 372-6954*

Date: *JULY 15, 1998*

Number of Pages (including this one): *30*

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30308

JUL 8 1980

REF: 4AH-AP

Mr. Albert W. Townsend
Coordinator of Ecological Planning
Lonestar Florida/Pennsuco, Inc.
P. O. Box 122035
Palm Village Station
Hialeah, Florida 33012

RECEIVED

MAY 10 1985

Dept. of Environmental Reg.
West Palm Beach

Re: PSD-FL-050 Fuel Conversion on
3 Kilns

Dear Mr. Townsend:

Review of your February 11, 1980 application to construct a coal handling facility and to convert three existing kilns to coal firing (PSD-FL-050) near Hialeah, Florida has been completed. The construction is subject to rules for the Prevention of Significant Deterioration (PSD) of air quality, contained in 40 CFR 52.21.

It has been determined that the modification, as described in the application meets all applicable requirements of the PSD regulations, subject to the conditions in the conclusion section to the Final Determination (enclosed). EPA has performed the Preliminary Determination concerning the proposed modification, and published a request for public comment on May 29, 1980.

Only one comment was received, that being from your company. In response to that comment, condition 11 has been reworded to clarify the exact definition of what averages constitute a compliance performance test for each of the various pollutants.

Authority to construct a modification to a Stationary Source is hereby issued, subject to the conditions in the Final Determination. This Authority to Construct is based solely on the requirements of 40 CFR 52.21, the Federal regulations governing significant deterioration of air quality. It does not apply to other permits issued by this agency or permits issued by other agencies.

Information regarding EPA permitting requirements can be provided if you contact Mr. Joe Franzmathes, Director, Office of Program Integration and Operations, at (404) 881-3476. Additionally, construction covered by this Authority to Construct must be initiated within 18 months from the receipt of this letter.

The United States Court of Appeals for the D.C. Circuit issued a ruling (December 14, 1979) in the case of Alabama Power Co. vs. Douglas H. Costle (78-1006 and consolidated cases) which has significant impact on the EPA Prevention of Significant Deterioration (PSD) program and permits issued thereunder. The ruling will require modification of the PSD regulations and could affect permits issued under the existing program. You are hereby advised that this permit may be subject to reevaluation. Please be advised that a violation of any condition issued as part of this approval, as well as any construction which proceeds in material variance with information submitted in your application will be subject to enforcement action.

Authority to Construct will take effect on the date of this letter. The complete analysis which justifies this approval has been fully documented for future reference, if necessary. Any questions concerning this approval may be directed to Kent Williams, Chief, New Source Review Section (404) 881-4552.

Sincerely yours,

Thomas W. Devine
Director
Air and Hazardous Materials Division

TWD:JWP:clu

Enclosure

cc: S. Smallwood
Florida Department of Environmental Regulation

J. Shumaker
J. Shumaker
7/1/80

K. Williams
K. Williams
7/2/80

T. Gibbs
T. Gibbs
7/3/80

Devine
Devine
7/8/80

PSD-FL-050
Final Determination

I. Applicant

Lonestar Florida/Pennsuco, Inc.
Cement and Aggregate Division
P. O. Box 122035
Palm Village Station
Hialeah, Florida 33012

II. Location

The proposed modification is located at the applicant's existing Portland Cement Plant at 11000 N.W. 121 Street, Hialeah (Dade County), Florida. The UTM coordinates are: Zone 17-562.75 km East and 2861.65 km North.

III. Project Description

The applicant proposes to convert fuel used in kilns #1, #2, and #3 from the permitted gas or oil firing to coal firing. Each kiln has one emission point. The coal to be fired will have a maximum sulfur content of 2 percent.

Further, the applicant proposes to construct a coal handling system with four (4) emission points. Each of these points are to be controlled by baghouse dust collectors.

A summary of new and modified facilities is shown in Table 1.

IV. Source Impact Analysis

Table 2 summarizes the total potential to emit (uncontrolled) from the proposed modification. The proposed modification has the potential to emit greater than 100 tons per year of particulates (TSP) and sulfur dioxide (SO₂). Therefore, in accordance with the provisions of Title 40, Code of Federal Regulations, Part 52.21 (40 CFR 52.21) promulgated June 19, 1978, a Prevention of Significant Deterioration (PSD) review is required for each of these pollutants.

TABLE 1
SUMMARY OF PROJECT

Facilities	Operating Capacity, Tons/Hour Input	Fuel	Process Weight Tons/Hour	Product Cement Clinker Tons/Hour
New Coal Handling				
Mill A	23	N/A	N/A	N/A
Mill B	75	N/A	N/A	N/A
Feedbin & Elevator	150 ^a	N/A	N/A	N/A
Hopper & Weight Feeder	150 ^a	N/A	N/A	N/A
Modified (After)				
	Feed	Coal (T/hr)		
#1 Kiln	40.5	7.5	48 ^c	25
#2 Kiln	40.5	7.5	48 ^c	25
#3 Kiln	141.75 ^b	23		87.5
		38		137.5
Modified (Before)				
		Gas (MMCF/hr)		
#1 Kiln	40.5	.18	40.5 ^c	25
#2 Kiln	40.5	.18	40.5 ^c	25
#3 Kiln	141.75 ^b	.54		87.5
		.90		137.5

^a Intermittent capacity since average capacity equals the sum of the two mills (38 tons/hr).

^b Basis of particulate emission standard - standards of Performance for New Stationary Sources (NSPS); 40 CFR 60 Subpart F.

^c Basis of particulate emission standard - Florida State Implementation Plan (SIP); 17-2.05 (2) FAC.

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The change in potential nitrogen oxide emissions due to the modification are not quantified. Without data to the contrary, the applicant has assumed the modification is subject to PSD review for nitrogen oxides. All other regulated pollutants are not subject to PSD review because potential emissions increase by less than 100 tons per year.

Full PSD review consists of:

1. Control Technology Review
2. Air Quality Review
 - a. Impact upon Ambient Air Quality
 - b. Impact upon Increment
 - c. Impact upon Soils, Visibility and Vegetation
 - d. Impact upon Class I Areas
3. Growth Analysis

Table 3 summarizes allowable emissions and the various categories of changes that determine the level of PSD review required under the regulations. Each type of facility and each pollutant is classified.

Line E of Table 3 shows that TSP has increased allowable emissions of less than 50 tons per year. With no limits placed upon operating time, 50 tons per year is more restrictive than the additional 100 pounds per hour or 1000 pounds per day criteria. Therefore, consistent with the provisions of 40 CFR 52.21(j) and (k), PSD review for particulates is limited to:

1. Ensuring compliance with State Implementation Plans (SIP) and Federal Regulations (40 CFR Parts 60 and 61), and
2. Impacts upon Class I areas and upon areas of known increment violation.

Table 3 shows that SO₂ increased allowable emissions of 562 tons per year requires full PSD review.

TABLE 2
APPLICABILITY SUMMARY

<u>Facilities</u>	<u>Potential to Emit (Uncontrolled), Tons/Year</u>				
	<u>TSP</u>	<u>SO₂</u>	<u>NO_x</u>	<u>CO</u>	<u>HC</u>
A. New	25100 ^a	0	0	0	0
B. Modified (After)	137313 ^b	612 ^c	(d)	Negl.	Negl.
C. Modified (Before)	137313 ^b	50 ^e	(d)	Negl.	Negl.
Net Increase from Modification ^f	25100	562	(d)	Negl.	Negl.
Accumulated from Previous Modification ^g	N/A	97	N/A	6.6	38
Total Increase	25100	659	(d)	6.6	38

^a Calculated from vender guaranteed controlled emissions (5.7 lb/hr) and assumed 99.9% efficiency.

^b Based on AP-42 Table 8.6-1 uncontrolled emissions 228 pounds of particulate per ton on cement ash in coal is absorbed in the cement product. Substantially less kiln feed ash in required for coal burning.

^c Potential emissions is based on the proposed allowable emission rate which is based on absorption of SO₂ in the clinker of 91.3 percent in kilns #1 and #2 and 98.7 percent in kiln #3.

^d The change in nitrogen oxides emissions are not quantified. Without data to the contrary, the applicant assumed PSD review applies. (See discussion in Section IV, A.4).

^e Based upon test results on existing facilities.

^f Source is subject to PSD review for specific pollutant if potential increased by 100 tons/year or more.

TABLE 3
 ALLOWABLE EMISSIONS, TONS PER YEAR
 (No Limits Upon Hours Per Year)

Facilities	TSP	SO ₂	NO _x
A. New or Reconstructed	25.4		
B. Modified (After)	468.2	612	<2624 ^a
C. Modified (Before)	<u>460.3</u>	<u>50</u>	<u>2624</u>
D. Increases from Modified	7.9	562	NONE
E. Increase New and Modified (A&D)	33.3	562	NONE

^a The applicant will determine minimum NO_x emission rates with performance tests following start-up. The proposed allowable represent the maximum allowable rate.

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It should be noted that the application was reviewed under the Partial Stay of PSD Regulations, published February 5, 1980 and the proposed revisions to the PSD regulations referenced in that partial stay. It was determined that the exemption outlined in the partial stay does not apply and that the proposed modification is subject to review under existing PSD regulations (promulgated 6/19/78) because:

1. The existing source is a major source of particulates as defined in the September 5, 1979 proposed revised regulations (greater than 100 tons of allowable emissions), and the proposed modification would significantly (greater than 10 tons per year) increase allowable emissions of particulates. And further,
2. The proposed modification alone is making the source a major modification because sulfur dioxide emissions increase by greater than 100 tons per year, irrespective of the sulfur dioxide emissions from the existing source.

A. Control Technology Review

Although these facilities are exempt from a Best Available Control Technology (BACT) review for the specific pollutants (TSP) and NO_x , they are required to meet all applicable emission limits and standards of performance under the Florida State Implementation Plan (SIP) and Federal Regulations (40 CFR Parts 60 and 61). In addition, and as discussed later in this section, the modification is subject to BACT review for SO_2 . Several of the facilities proposed for construction are subject to Federal New Source Performance Standards (NSPS) and/or requirements under the Florida SIP. These requirements are referenced in Table 4 which summarizes the allowable emission limits for the proposed emission limits for the proposed new and modified facilities. Only the most stringent requirement of (1) NSPS, (2) Florida SIP, (3) Florida permit, or (4) allowable limit proposed by the applicant is listed.

The limitations upon emissions of nitrogen oxides from the three kilns were proposed by the applicant and are conditions of this permit to ensure the

TABLE 4

SUMMARY OF ALLOWABLE EMISSIONS LIMITS

Facility/Pollutant	Basis for Requirement	Emissions Limits Standard	lbs/hr
23 Ton Mill			
TSP	Proposed by Applicant, Florida BACT	<.01 grains/ACF	≤ 3.1
Opacity	NSPS Subpart Y (40 CFR 60.252)	<20%	-
15 Ton Mill			
TSP	Same	≤.01 grains/ACF	≤2.1
Opacity	Same	<20%	-
Feedbin & Elevator			
TSP	Same	<.01 grains/ACF	≤0.3
Opacity	Same	<20%	-
Hopper & Weight Feeder			
TSP	Same	≤.01 grains/ACF	≤0.3
Opacity	Same	<20%	-
#1 Kiln			
TSP	Florida SIP, Operating Permit	Florida Process Weight Equation	≤32.2
SO ₂	Proposed by Applicant as BACT	≤2% S in Coal, 2.27 lbs/ton ^a	≤56.7
NO _x	Proposed by Applicant	≤4.73 lbs/Ton ^a	<118

TABLE 4
SUMMARY OF ALLOWABLE EMISSIONS LIMITS
(Continued)

Facility/Pollutant	Basis for Requirement	Emissions Limits Standard	lbs/hr
#2 Kiln			
TSP	Florida Permit	Florida Process Weight Equation	≤32.2
SO ₂	Proposed by Applicant as BACT	<2% S in Coal, 2.27 lbs/Ton ^a	≤56.7
NO _x	Proposed by Applicant	<4.79 lbs/Ton ^a	<118
#3 Kiln			
TSP	Florida SIP & Federal NSPS Subpart F (40 CFR 60.62)	≤0.30 lb/Ton feed ^b	≤42.5
SO ₂	Proposed by Applicant as BACT	<2% S in Coal, 0.3 lbs/Ton ^a	≤26.3
NO _x	Proposed by Applicant	<6.77 lbs/Ton ^a	≤592
Opacity	Federal NSPS Subpart F (40 CFR 60.62)	≤20%	-

^a Pounds of pollutant per ton of clinker produced.

^b Pounds of TSP per ton of feed (except fuel).

Lonestar Florida/Pennsuco

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validity of the exemption from further PSD review (no net increase in emissions).

The three kilns emitting increased sulfur dioxide are reviewed for a determination of Best Available Control Technology (BACT). To achieve the limited emissions of Table 4 the following control technologies will be utilized:

1. Coal Handling System - Particulates

All potential particulate emissions points are controlled by baghouse type dust collectors. These are to control 99.9 percent of the particles above 0.5 microns. The exhaust gases will have a maximum concentration of 0.01 grains per actual cubic foot.

These have been proposed to the State of Florida to meet the SIP BACT requirements.

These facilities must not emit gases which exhibit 20 percent opacity or greater. These baghouses and properly ducted dust collection system should comply with this requirement.

2. Kilns - Particulates

The existing kilns will continue to utilize their existing electrostatic precipitators to maintain compliance with the emission standards specified in their operating permits in accordance with the Florida SIP. Number 3 kiln will continue to operate in compliance with the NSPS standards under which it has been certified with continued compliance verified by the State of Florida.

A small increase in allowable TSP emissions is due to the addition of the solid coal to the process weight. The allowable emissions are calculated according to the Florida SIP process weight rule. The actual emissions will probably not increase because the ash introduced with the coal (compared with gas as a fuel) is compensated by a decrease in fly ash in the cement feed materials.

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3. Kilns - Sulfur Dioxide (BACT)

The three kilns are subject to a BACT review for the control of sulfur dioxide.

Sulfur dioxide potentially is derived from sulfur in the process feed materials and from sulfur in the fuel.

The majority of this potential sulfur dioxide combines with the process products (limestone). The efficiency of this absorption is a function of the size and design (mixing of gas and solids) of the kilns and also of the type of particulate control (baghouse is better than electrostatic precipitator - due to intimate contact of gas with fine particles). Since the three kilns and their particulate controls are existing these parameters will not change. The applicant presents test results using oil (2.38% sulfur) as fuel. These results show that 91.3 percent of the potential sulfur dioxide was absorbed by the products in the smaller kilns (#1 and #2), and that 98.7 percent of the potential sulfur dioxide was absorbed in the larger kiln (#3). The applicant proposes BACT be the use of low sulfur coal (maximum 2% sulfur) and a maximum of 2.27 pounds of SO_2 per ton of clinker produced from kiln #1 and #2, and 0.30 pounds of SO_2 per ton of clinker produced from kiln #3.

EPA concurs with the applicant that for the cases of existing kilns with existing particulate control technology these do constitute BACT. Further the applicant used these emission rates at full design operating rates in its air quality presentation.

4. Kilns - Nitrogen Oxides

The applicant has proposed to run tests to optimize operating conditions. The criteria to judge such optimization would be:

- a. satisfactory product,
- b. energy economy,
- c. minimum NO_x emissions, and
- d. continued negligible emissions of carbon monoxide and hydrocarbons.

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The applicant further stipulates that the NO_x emissions shall be less than those from the existing gas fueled operation. These current NO_x emissions have been established by tests to be 6.77 pounds of NO_x per ton of clinker produced from Kiln #3 and 4.7 pounds per ton from Kilns #1 and #2.

The applicant has presented published¹ test data which reports emissions of nitrogen oxides are less using coal than when using gas or oil as a fuel for cement kilns. This report attributes this reduction to the characteristics of the flame. It has been described as a longer, "lazier" flame (with lower temperature in the center of the flame). The conclusion that reduced emissions of nitrogen oxides are experienced when cement kilns are converted from gas to coal fuel has also been reported in reference 2.

The coal to be used in this proposed modification will contain ~1.7 percent nitrogen (compared with ~0 percent for gas or <.5 percent for oil). Therefore, the potential for fuel derived NO_x is greater. The literature² confirms that less than 20 percent of the fuel nitrogen will be converted to nitrogen oxides and that the amount of conversion is a function of the same flame characteristic variables (maximum temperature, and time at high temperature) that control thermally derived NO_x (oxidation of atmospheric nitrogen). AP-42 emission factors and NSPS for large utility boilers seem to indicate the potential for increased NO_x emissions of coal firing over gas firing. Regardless of these factors that indicate nitrogen oxide emissions could increase, the EPA concurs with the applicant that operating conditions can be found which will result in reduced emissions, or at least no net increased emissions. Therefore, with testing to find allowable operating conditions required as a permit condition. No net increase in NO_x emissions will occur and no air quality impact analysis is required for NO_x consistent with paragraph (k) of 40 CFR 52.21.

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B. Air Quality Review - 40 CFR 52.21 (2)

The applicant has demonstrated with the modeling results summarized in Table 5 that the impact upon the annual, 24-hour and 3-hour National Ambient Air Quality Standards for SO₂ and upon the annual and 24-hour Class II increment are below the significance levels as published 43 FR 26398, June 19, 1978.

The modeling was conservatively run upon the total SO₂ emissions from the three kilns rather than only the increase (coal less gas).

The CRSTER model was used to determine maximum predicted annual concentrations and to identify worst-case 24-hour and 3-hour meteorological conditions. The CRSTER was run using five years (1970-1974) of meteorological data. The maximum short term 24-hour and 3-hour predictions were made using the PTMTP-W model.

The lack of significant impact indicated by this modeling eliminates requirements for monitoring detailed NAAQS and increment impact analyses, growth impacts and additional impact analyses upon visibility, soils, and vegetation.

C. Class I Area Impact

The proposed modification is located about 30 km from the Everglades National Park. As discussed previously maximum impacts which occur in the vicinity of the plant are insignificant. On the basis that further dilution will occur over the 30 kilometers, the impact on this Class I area is considered insignificant and detailed assessment of Class I area impacts is not required.

V. Conclusions

EPA Region IV proposes a final determination of approval for construction of the new coal handling facilities and the conversion to coal as a fuel for kilns #1, #2, and #3 by Lonestar Florida/Pennsuco, Inc. as proposed in its application dated February 11, 1980 as amended by letter dated April 25, 1980.

The conditions set forth in the permit are as follows:

TABLE 5
AIR QUALITY IMPACT ANALYSIS

	<u>SO₂, micrograms/meter³</u>		
	<u>Annual</u>	<u>24-hour average^a</u>	<u>3-hour average^a</u>
NAAQS	80	365	1300
Class II Increments	20	91	512
Maximum Predicted Concentration	0.63	4.90	18
Significance Level	1	5	25

^a Not to be exceeded more than once per year.

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1. The modifications and the facilities constructed shall be in accordance with the capacities and specifications stated in the application. Specifically included are the operating capacities listed in Table 1 for new and modified facilities.
2. Particulate emissions from each of the four new emitting points of the coal handling system shall not exceed 0.01 grains per actual cubic foot or the emission limits listed in Table 4.
3. Visible emissions from four emission points of the coal handling system shall be less than 20 percent opacity. Visible emissions from any fugitive sources associated with the coal handling system shall be less than 20 percent opacity. Opacity shall be measured by EPA standard method 9.
4. Emissions of sulfur dioxide from #1 and #2 kilns shall not exceed 56.7 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 2.27 pounds per ton of clinker produced.
5. Emissions of sulfur dioxide from #3 kiln shall not exceed 26.3 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 0.30 pounds per ton of clinker produced.
6. The coal used to fuel kilns #1, #2 and #3 shall have a sulfur content of 2 percent or less.
7. Tests shall be run to optimize the operating conditions toward a minimum emissions of nitrogen oxides. The results of the test shall be analyzed and the resulting optimum operating conditions shall be described to EPA Region IV with a plan describing how continuing compliance will be maintained.

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8. Emissions of nitrogen oxides from #1 and #2 kilns shall be less than 118 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 nitrogen oxides shall not exceed 4.73 pounds per ton of clinker produced.
9. Emissions of nitrogen oxides from #3 kiln shall be less than 592 pounds per hour from each kiln at the maximum operating rate of 87.5 tons per hour of clinker produced. At lesser operating rates the emissions of nitrogen oxides shall not exceed 6.77 pounds per ton of clinker produced.
10. Visible emissions from #3 kiln shall be less than 20 percent opacity as measured by EPA standard method 9.
11. Compliance with all hourly emissions limits (Table 4) shall be determined by performance tests scheduled in accordance the General Conditions attached. The performance tests shall be in accordance with the provisions of reference methods in Appendix A of 40 CFR 60, except as provided under 40 CFR 60.8(b), as follows:
 - a. Method 1 for sample and velocity traverses;
 - b. Method 2 for velocity and volumetric flow rate;
 - c. Method 3 for gas analysis;
 - d. Method 5 for concentration of particulate matter and associated moisture content;
 - e. Method 6 for concentration of SO₂; and
 - f. Method 7 for concentration of NO_x. For Method 7 each run shall consist of at least four grab samples taken at approximately 15-minute intervals. The arithmetic mean of the samples shall constitute the run value.

Lonestar Florida/Plainsuco

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- g. For Method 6, the minimum sampling time shall be 20 minutes and the minimum sampling volume 0.02 dscm (0.71 dscf) for each sample. The arithmetic mean of two samples shall constitute one run. Samples shall be taken at approximately 30-minute intervals.

A compliance test shall consist of the average of at least three (3) consecutive runs.

The processes shall operate within 10 percent of maximum capacity during sampling.

12. The source will comply with the requirements of the attached General Conditions.

REFERENCES

1. Hilovsky, Robert J., PE; NO_x Reductions in the Portland Cement Industry with Conversion to Coal-Firing, Presented at the 1977 EPA Emission Inventory/Factor Workshop, Raleigh, North Carolina. September 13-15, 1977.
2. EPA-450/1-78-001, January 1978, Control Techniques for Nitrogen Oxide Emissions from Stationary Sources.

GENERAL CONDITIONS

1. The permittee shall notify the permitting authority in writing of the beginning of construction of the permitted source within 30 days of such action and the estimated date of start-up of operation.
2. The permittee shall notify the permitting authority in writing of the actual start-up of the permitted source within 30 days of such action and the estimated date of demonstration of compliance as required in the specific conditions.
3. Each emission point for which an emission test method is established in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the permitting authority of the scheduled date of compliance testing at least thirty (30) days in advance of such test. Compliance test results shall be submitted to the permitting authority within forty-five (45) days after the complete testing. The permittee shall provide (1) sampling ports adequate for test methods applicable to such facility, (2) safe sampling platforms, (3) safe access to sampling platforms, and (4) utilities for sampling and testing equipment.
4. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of two (2) years from the date of recording.
5. If, for any reason, the permittee does not comply with or will not be able to comply with the emission limitations specified in this permit, the permittee shall provide the permitting authority with the following information in writing within five (5) days of such conditions:
 - (a) description of noncomplying emission(s),
 - (b) cause of noncompliance,
 - (c) anticipated time the noncompliance is expected to continue or, if corrected, the duration of the period of noncompliance,
 - (d) steps taken by the permittee to reduce and eliminate the noncomplying emission,and
 - (e) steps taken by the permittee to prevent recurrence of the noncomplying emission.

Failure to provide the above information when appropriate shall constitute a violation of the terms and conditions of this permit. Submittal of this report does not constitute a waiver of the emission limitations contained within this permit.

6. Any change in the information submitted in the application regarding facility emissions or changes in the quantity or quality of materials processed that will result in new or increased emissions must be reported to the permitting authority. If appropriate, modifications to the permit may then be made by the permitting authority to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause violation of the emission limitations specified herein.
7. In the event of any change in control or ownership of the source described in the permit, the permittee shall notify the succeeding owner of the existence of this permit by letter and forward a copy of such letter to the permitting authority.
8. The permittee shall allow representatives of the State environmental control agency or representatives of the Environmental Protection Agency, upon the presentation of credentials:
 - (a) to enter upon the permittee's premises, or other premises under the control of the permittee, where an air pollutant source is located or in which any records are required to be kept under the terms and conditions of the permit;
 - (b) to have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit, or the Act;
 - (c) to inspect at reasonable times any monitoring equipment or monitoring method required in this permit;
 - (d) to sample at reasonable times any emission of pollutants;and
 - (e) to perform at reasonable times an operation and maintenance inspection of the permitted source.
9. All correspondence required to be submitted by this permit to the permitting agency shall be mailed to the:

Chief, Air Facilities Branch
Air and Hazardous Materials Division
U.S. Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30308
10. The conditions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

The emission of any pollutant more frequently or at a level in excess of that authorized by this permit shall constitute a violation of the terms and conditions of this permit.

JAN 7 Rec'd

Best Available Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 28 1984

REF: 4AW-AM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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, dated November 9, 1984, Florida facility. In accordance with the (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.

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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:

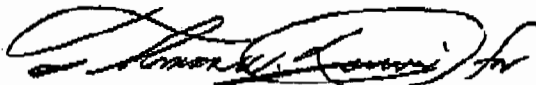
13. Only two kilns will be operated with coal as fuel at the same time. The Company shall maintain a log or logs that show(s), as a minimum: the operational status of all three kilns at any time; when each kiln is placed in service; the clinker, feed, and fuel feed rates to each kiln; and when the kiln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

-3-

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

Table TA-AI-AC1. Summary of Federally Enforceable Air Permits for Emission Units, Tarmac America, Pennsuco

Title V Emission						
Unit	Source Description	Point ID	Permit No.	Date	Agency	Pollutants
1	Coal Handling	G-509/G-521	PSD-FL-050	7/8/80	EPA	VE, PM
	Coal Grinding	G527/576/578/580/582	PSD-FL-050	7/8/80	EPA	VE, PM
	Coal Grinding	G527/576/578/580/582	PSD-FL-142/AC13-169901	2/25/91	DEP	VE
2	Kiln #2	Kiln #2	PSD-FL-142/AC13-169901	2/25/91	DEP	SO2, SAM NOx, CO, VOC PM/PM10
3	Cooler #2	Cooler #2 ESP	None			
4	Kiln #3	Kiln #3	PSD-FL-050	7/8/80	EPA	SO2, NOx, PM
	Kiln #3	Kiln #3	AC13-054054	3/22/85	DEP	SO2
5	Cooler #3	K-332	None			
6	Insufflation System	K-181/K-383/K-396	None			
7	Finish Mill #1	F-130/F-113	None			
	Finish Mill #2	F-230/F-213	None			
	Finish Mill #3	F-330/F-332/F-313	None			
	Finish Mill #4	All	PSD-FL-028	03/19/80	EPA	VE, PM
	Finish Mill #4	All	AC13-21094	11/2/79	DEP	VE
8	Slag Dryer	Slag Dryer Baghouse	PSD-FL-230/AC13-273887	11/15/95	DEP	PM/PM10/VE
	Waste Piles/ Yard	Various	PSD-FL-230/AC13-273887	11/15/95	DEP	
9	Clinker H/S	K-447/K-347	PSD-FL-230/AC13-273887	11/15/95	DEP	VE
	Clinker H/S	K-633	PSD-FL-230/AC13-273887	11/15/95	DEP	VE
	Clinker H/S	K-147/K-247/K-521/K-522	None			
10	Kiln #1	Kiln #1	PSD-FL-050	7/8/80	EPA	SO2, NOx, PM
11	Cooler #1	Cooler #1 ESP	None			
12	Cement Silos 10-12	F-513/F-514/F-515	AC13-21098	11/2/79	11/12/79	VE
	Cement Loadout 3	B-382/B-372/B-374	None			
	Cement Loadout 1, 2	B-110/B-210	AC13-273887	11/15/95	DEP	VE
	Cement Packhouse	B-621	PSD-FL-028	03/19/80	EPA	VE, PM
	Cement Silos 1-9	F-511/F-512	None			
13	Unregulated sources	None				
14	Cement Block Plant	3 baghouses	AC13-242281	3/11/94	DEP	VE
15	Cement Batch Plant	4 baghouses	AC13-158138	5/19/89	DEP	VE

Table TA-AI-AC2 . Summary of Opacity Standards, Tarmac America, Pennsuco.

Emission Unit	Point Description	Point ID	Opacity Limit		Other Requirements
			(%)	Basis	
1	Coal Handling	G-509/G-521	5*	4/8/80 BACT	Method 9 Test
	Coal Grinding	G527/576/578/580/582	5*	4/8/80 BACT	Method 9 Test
	Coal Grinding	G527/576/578/580/582	20	NSPS Subpart Y	Method 9 Test
	Coal Handling/Grinding	All	20	General Std	Method 9 Test
2	Kiln #2	Kiln #2	20	General Std	Method 9 Test
3	Cooler #2	Cooler #2 ESP	20	General Std	Method 9 Test
4	Kiln #3	Kiln #3	10*	NSPS Subpart F	COMS
	Kiln #3	Kiln #3	20	General Std	Method 9 Test
5	Cooler #3	K-332	10*	NSPS Subpart F	COMS
	Cooler #3	K-332	20	General Std	Method 9 Test
6	Insufflation System	K-181/K-383/K-396	20*	General Std	Method 9 Test
7	Finish Mill #1	F-130/F-113	20*	General Std	Method 9 Test
	Finish Mill #2	F-230/F-213	20*	General Std	Method 9 Test
	Finish Mill #3	F-330/F-332/F-313	20*	General Std	Method 9 Test
	Finish Mill #4	All	5*	10/15/79 BACT	Method 9 Test
	Finish Mill #4	F-430	5	11/15/95 BACT	Method 9 Test
	Finish Mill #4	All	5	3/19/80 BACT	Method 9 Test
	Finish Mill #4	All	10	NSPS Subpart F	Method 9 Test
8	Slag Dryer	Slag Dryer Baghouse	10*	11/15/95 BACT	Method 9 Test
9	Clinker H/S	K-447/K-347	10*	11/15/95 BACT	Method 9 Test
	Clinker H/S	K-633	5*	11/15/95 BACT	Method 9 Test
	Clinker H/S	K-147/K-247/K-521/K-522	20*	General Std	Method 9 Test
10	Kiln #1	Kiln #1	20*	General Std	Method 9 Test
11	Cooler #1	Cooler #1 ESP	20*	General Std	Method 9 Test
12	Cement Silos 10,11,12	F-513/F-514/F-515	5*	10/15/79 BACT	Method 9 Test
	Cement Silos 10,11,12	F-513/F-514/F-515	10	NSPS Subpart F	Method 9 Test
	Cement Loadout Unit 3	B-382/B-372/B-374	5*	10/15/79 BACT	Method 9 Test
	Cement Loadout Unit 3	B-382/B-372/B-374	10	NSPS Subpart F	Method 9 Test
	Cement Loadout 1, 2	B-110/B-210	10*	NSPS Subpart F	Method 9 Test
	Cement Packhouse	B-621	10	NSPS Subpart F	Method 9 Test
	Cement Packhouse	B-621	5*	BACT	Method 9 Test
	Cement Silos 1-9	F-511/F-512	20*	General Std	Method 9 Test
13	Waste Piles/ Yard	Various	20*	General Std	
14	Cement Block Plant	3 baghouses	5*	Rule 62-296.414	Method 9 Test
15	Cement Batch Plant	4 baghouses	5*	Rule 62-296.414	Method 9 Test

Notes:

H/S = Handling/Storage

COMS= Continuous Opacity Monitoring Systems

*** Indicates most stringent standard**

Table TA-AI-AC3. Summary of PSD/NSPS/BACT Mass Emission Standards, Tarmac America, Pennsuca.

Emission		Emissions Limit				Other Requirements
Unit	Point Description	Point ID	Pol.	Annual	Basis	
1	Coal Hand/Grind	All baghouses	PM	0.01 gr/dacf	4/8/80 BACT	Method 5/9 Test
2	Kiln #2	Kiln #2 ESP	SO2	788.7 TPY	PSD-FL-142	Method 8 Test
			SAM	23.06 TPY	PSD-FL-142	Method 8 Test
			NOx	448.4 TPY	PSD-FL-142	Method 7 Test
			CO	1363.9 TPY	PSD-FL-142	Method 10 Test
			VOC	113.5 TPY	PSD-FL-142	Method 25 Test
			PM	56.78 TPY*	PSD-FL-142	Method 5 Test
			PM10	Process Wt 48.25 TPY	Rule 62-296.407(1), F.A.C PSD-FL-142	Method 5 Test
3	Cooler #2	Cooler #2 ESP	PM	Process Wt	Rule 62-296.407(1), F.A.C	Method 5 Test
4	Kiln #3	Kiln #3 ESP	SO2	4.8 lb/ton clink	PSD-FL-050, 1/21/86 BACT	Method 6 Test
			PM	0.3 lb/ton feed	PSD-FL-050; NSPS Subpart F	Method 5 Test
			NOx	6.77 lb/ton clink	PSD-FL-050	Method 7/7E Test
5	Cooler #3	K-332	PM	0.1 lb/ton feed	NSPS Subpart F	Method 5 Test
6	Inaufflation System	K-181/K-353/K-396	None	-		
7	Finish Mill #1	F-130/F-113	PM	Process Wt	Rule 62-296.407(1), F.A.C	Method 5/9 Test
			PM	Process Wt	Rule 62-296.407(1), F.A.C	Method 5/9 Test
			PM	Process Wt	Rule 62-296.407(1), F.A.C	Method 5/9 Test
			PM	0.01 gr/dacf	3/19/80 BACT PSD-FL-28	Method 5/9 Test
			PM	0.01 gr/dacf	3/19/80 BACT PSD-FL-28	Method 5/9 Test
			PM	0.01 gr/dacf	3/19/80 BACT PSD-FL-28	Method 5/9 Test
			PM	0.01 gr/dacf	3/19/80 BACT PSD-FL-28	Method 5/9 Test
			PM	0.01 gr/dacf	3/19/80 BACT PSD-FL-28	Method 5/9 Test
			PM	0.01 gr/dacf	11/15/95 BACT	Method 5/9 Test
8	Slag Dryer	Slag Dryer Baghouse	PM	0.04 gr/dacf	11/15/95 BACT	Method 9 Test
			PM10	0.04 gr/dacf	11/15/95 BACT	Method 9 Test
9	Olinker H/S	All	None	-		
10	Kiln #1	Kiln #1	PM	Process Wt	Rule 62-296.407(1), F.A.C	Method 5 Test
			NOx	2 lb/MMBtu	NOx RACT Rule 62-296.570(4)(b)8.	
11	Cooler #1	Cooler #1 ESP	PM	Process Wt	Rule 62-296.407(1), F.A.C	Method 5 Test
12	Cement Silos 10,11,12	F-513/F-514/F-515	None	-		
			None	-		
			None	-		
			PM	0.01 gr/dacf	3/19/80 BACT PSD-FL-28	Method 5/9 Test
			None	-		
13	Waste Piles/ Yard	Various	None	-		
			None	-		
14	Cement Block Plant	3 baghouses	None	-		
15	Cement Batch Plant	4 baghouses	None	-		

H/S = Handling / Storage

clink = clinker

Process Wt = Process Weight Table Standard for PM

* Indicates most stringent limit

Note: Opacity Standards are presented in Table TA-AI-AC2

Table TA-AI-AC4. Summary of Potential Emissions as reflected in Title V Application, Tarmac America, Pennsuco

Title V Emission		Potential Emissions (TPY)							
Unit	Source Description	VE (a)	PM	PM10	SO2	NOx	CO	VOC	SAM
✓01	Coal Handling/Grinding	5%	18.8	18.8	—	—	—	—	—
✓02	Kiln #2	20%	58.8	48.25	768.7	448.4	1,363.9	113.5	23.06
✓03	Cooler #2	20%	115.7	>5	—	—	—	—	—
✓04	Kiln #3	10%	186.6	>5	1,752	2,594	>5	>5	>5
✓05	Cooler #3	10%	62.2	>5	—	—	—	—	—
06	Insufflation System	20%	<5	<5	—	—	—	—	—
07	Finish Mill #1 - #4	5% - 20%	410.5	>5	—	—	—	—	—
08	Slag Dryer	10%	6.15	6.15	>5	>5	>5	>5	>5
✓09	Clinker H/S	5% - 20%	>5	>5	—	—	—	—	—
✓10	Kiln #1	20%	137.1	>5	>5	1,423.5	>5	>5	>5
✓11	Cooler #1	20%	115.7	>5	—	—	—	—	—
12 (b)	Cem. Silos1-12 Loadout 123, P.house	5% - 20%	27	>5	—	—	—	—	—
13	Unregulated sources	%20	>5	>5	—	>5	—	>5	—
14	Cement Block Plant	5%	<5	<5	—	—	—	—	—
15	Cement Batch Plant	5%	<5	<5	—	—	—	—	—

(a) Potential emissions reflect percent opacity.

(b) Potential emissions reflect PM emissions by all sources. Potential emissions of Packhouse are limited by permit to 5.2 TPY.

**MAJOR AIR POLLUTION SOURCE ANNUAL OPERATION LICENSE FEE FORM
SOURCE INFORMATION SHEET**

Facility Name: TARMAC - Pennsuco Cement Plant

Emissions Unit Permit/Certification No.: AO13-238048

Emissions Unit I.D. No. (if known): _____

Brief Description of Source (emission unit regulated individually, or group or emission units regulated collectively): Kiln #3

I. Regulated Air pollutant(s) allowed to be emitted by specific permit condition for this emission unit or group of emissions units (excluding carbon monoxide)	II. Most limiting maximum allowable pollutant emission rate (fill in one column only for each pollutant)				III. Operating conditions - Maximum allowed by permit per year		IV. Operating conditions - Actual documented for reported calendar year		V. Annual emissions to which fees apply		
	pounds per hour	tons per year	tons per unit of material or heat input or product output	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	calculated annual tons of pollutant emissions	actual tons recorded annual emissions using C.E.M. or other DEP approved method	code	
(a)	(b)	(c)	(d) (tons)	(e) (units)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
particulates			1.5e-04	DKF				1057553	158.6	✓	
SO ₂			2.3e-03	CLK				668492	1537.5	✓	
NO _x X 2000			3.4e-03	CLK				668492	2272.9	✓	

Calculations/Comments:

No. 4 of 17 total Source Information Sheets submitted for this facility.

**MAJOR AIR POLLUTION SOURCE ANNUAL OPERATION LICENSE FEE FORM
SOURCE INFORMATION SHEET**

Facility Name: TARMAC - Pennsuco Cement Plant

Emissions Unit Permit/Certification No.: AO13-238048

Emissions Unit I.D. No. (if known): _____

Brief Description of Source (emission unit regulated individually, or group or emission units regulated collectively): Kiln #2 (Includes revisions in AC13-169901)

I. Regulated Air pollutant(s) allowed to be emitted by specific permit condition for this emission unit or group of emissions units (excluding carbon monoxide)	II. Most limiting maximum allowable pollutant emission rate (fill in one column only for each pollutant)				III. Operating conditions - Maximum allowed by permit per year		IV. Operating conditions - Actual documented for reported calendar year		V. Annual emissions to which fees apply		
	pounds per hour	tons per year	tons per unit of material or heat input or product output		hours of operation	amount of material or heat input or product output [in units specified in column (e)]	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	calculated annual tons of pollutant emissions	actual tons recorded annual emissions using C.E.M. or other DEP approved method	code
			(tons)	(units)							
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
particulates	14.4				7884		7713		55.5		
PM10	12.2				7884		7713		47.0		
SO ₂	195.0				7884		7713		752.0	✓	
H ₂ SO ₄	5.9				7884		7713		22.8		
NO _x	113.8				7884		7713		438.9	✓	
VOC	28.8				7884		7713		111.1	✓	

Calculations/Comments:



No. 2 of 17 total Source Information Sheets submitted for this facility.

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**MAJOR AIR POLLUTION SOURCE ANNUAL OPERATION LICENSE FEE FORM
SOURCE INFORMATION SHEET**

Facility Name: TARMAC - Pennsuco Cement Plant

Emissions Unit Permit/Certification No.: AO13-238048

Emissions Unit I.D. No. (if known): _____

Brief Description of Source (emission unit regulated individually, or group or emission units regulated collectively): Kiln #3

I. Regulated Air pollutant(s) allowed to be emitted by specific permit condition for this emission unit or group of emissions units (excluding carbon monoxide)	II. Most limiting maximum allowable pollutant emission rate (fill in one column only for each pollutant)			III. Operating conditions - Maximum allowed by permit per year		IV. Operating conditions - Actual documented for reported calendar year		V. Annual emissions to which fees apply			
	pounds per hour	tons per year	tons per unit of material or heat input or product output	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	calculated annual tons of pollutant emissions	actual tons recorded annual emissions using C.E.M. or other DEP approved method	code	
(a)	(b)	(c)	(d) (tons)	(e) (units)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
particulates			✓ 1.5e-04	DKF				1,085,216	162.8	✓	
SO ₂			✓ 2.3e-03	CLK				677,700	1558.7	✓	
NO _x			✓ 3.4e-03	CLK				677,700	2304.2	✓	

Calculations/Comments:

DKF = dry kiln feed CLK = clinker

No. 4 of 17 total Source Information Sheets submitted for this facility.

**MAJOR AIR POLLUTION SOURCE ANNUAL OPERATION LICENSE FEE FORM
SOURCE INFORMATION SHEET**

Facility Name: TARMAC - Pennsuco Cement Plant

Emissions Unit Permit/Certification No.: AO13-238048

Emissions Unit I.D. No. (if known): _____

Brief Description of Source (emission unit regulated individually, or group or emission units regulated collectively): Kiln #2 (Includes revisions in AC13-169901)

I. Regulated Air pollutant(s) allowed to be emitted by specific permit condition for this emission unit or group of emissions units (excluding carbon monoxide)	II. Most limiting maximum allowable pollutant emission rate (fill in one column only for each pollutant)				III. Operating conditions - Maximum allowed by permit per year		IV. Operating conditions - Actual documented for reported calendar year		V. Annual emissions to which fees apply		
	pounds per hour	tons per year	tons per unit of material or heat input or product output		hours of operation	amount of material or heat input or product output [in units specified in column (e)]	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	calculated annual tons of pollutant emissions	actual tons recorded annual emissions using C.E.M. or other DEP approved method	code
(a)	(b)	(c)	(tons) (d)	(units) (e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
particulates	14.4	✓			7884		7580		54.6	✓	
PM10	12.2	✓			7884		7580		46.2	✓	
SO ₂	195.0	✓			7884		7580		739.1	✓	
H ₂ SO ₄	5.9	✓			7884		7580		22.4	✓	
NO _x	220.0	✓			7884		7580		833.8	✓	
VOC	28.8	✓			7884		7580		109.2	✓	

Calculations/Comments:

No. 2 of 17 total Source Information Sheets submitted for this facility.

o/k

**MAJOR AIR POLLUTION SOURCE ANNUAL OPERATION LICENSE FEE FORM
FEE PAYMENT CALCULATION SHEET**

Facility Name: TARMAC - Pennsuco Cement Plant

Regulated Air pollutant(s) allowed to be emitted by specific permit conditions for this facility (excluding carbon monoxide).	Total facility annual emissions for each pollutant listed in column (a). [Sum of column entries (j) and/or (k) for pollutant on Page(s) B for all emission units at facility]	If amount in column (b) is less than 4000 tons, enter amount in column (c). If the amount in column (b) is equal to or greater than 4000 tons, enter 4000 in column (c).	Multiply amount in column (c) by the applicable fee factor pursuant to Rule 62-213.205, F.A.C. and enter dollar amount in column (d).
(a)	(b)	(c)	(d)
particulate matter	679.6	679.6	\$16,990.00
PM10	47.0	47.0	\$1,175.00
sulfur dioxide [SO ₂]	2289.5	2289.5	\$57,237.50
nitrogen oxides [NO _x]	2711.8	2711.8	\$67,795.00
sulfuric acid mist	22.8	22.8	\$570.00
VOC emissions	111.1	111.1	\$2,777.50
Total Fee Amount (must be no less than \$250.00 minimum fee)			\$146,545.00

**MAJOR AIR POLLUTION SOURCE ANNUAL OPERATION LICENSE FEE FORM
FEE PAYMENT CALCULATION SHEET**

Facility Name: **TARMAC - Pennsuco Cement Plant**

Regulated Air pollutant(s) allowed to be emitted by specific permit conditions for this facility (excluding carbon monoxide).	Total facility annual emissions for each pollutant listed in column (a). [Sum of column entries (j) and/or (k) for pollutant on Page(s) B for all emission units at facility]	If amount in column (b) is less than 4000 tons, enter amount in column (c). If the amount in column (b) is equal to or greater than 4000 tons, enter 4000 in column (c).	Multiply amount in column (c) by the applicable fee factor pursuant to Rule 62-213.205, F.A.C. and enter dollar amount in column (d).
(a)	(b)	(c)	(d)
particulate matter	686.1	686.1	\$17,152.50
PM10	46.2	46.2	\$1,155.00
sulfur dioxide [SO ₂]	2297.8	2297.8	\$57,445.00
nitrogen oxides [NO _x]	3138.0	3138.0	\$78,450.00
sulfuric acid mist	22.4	22.4	\$560.00
VOC emissions	109.2	109.2	\$2,730.00
Total Fee Amount (must be no less than \$250.00 minimum fee)			\$157,492.50 ✓

**MAJOR AIR POLLUTION SOURCE ANNUAL OPERATION LICENSE FEE FORM
SOURCE INFORMATION SHEET**

Facility Name: TARMAC - Pennsuco Cement Plant

Emissions Unit Permit/Certification No.: AO13-238048

Emissions Unit I.D. No. (if known): _____

Brief Description of Source (emission unit regulated individually, or group or emission units regulated collectively): Cooler #3

I. Regulated Air pollutant(s) allowed to be emitted by specific permit condition for this emission unit or group of emissions units (excluding carbon monoxide)	II. Most limiting maximum allowable pollutant emission rate (fill in one column only for each pollutant)			III. Operating conditions - Maximum allowed by permit per year		IV. Operating conditions - Actual documented for reported calendar year		V. Annual emissions to which fees apply		
	pounds per hour	tons per year	tons per unit of material or heat input or product output	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	hours of operation	amount of material or heat input or product output [in units specified in column (e)]	calculated annual tons of pollutant emissions	actual tons recorded annual emissions using C.E.M. or other DEP approved method	code
(a)	(b)	(c)	(tons) (d) (units) (e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
particulates		✓	5.0e-05	DKF			1,085,216	54.3	✓	

Calculations/Comments:

DKF = dry kiln feed

ok

No. 5 of 17 total Source Information Sheets submitted for this facility.

perMits | Events | Payment | Facility | party | Reports | Help | eXit

----- Permitting Application -----

+----- ARMS Facility -----+

| Facility Name: STERLING FIBERS, INC. AIRS ID: 1130003 |
| County: SANTA ROSA Owner: STERLING FIBERS, INC. |
| Office: NW: PENSACOLA Category: POINT |

+----- Project -----+

| AIR Permit #: - - Project #: 005 CRA Reference #: |
| Permit Office: TAL (HEADQUARTERS) Agency Action: Pending |
| Project Name: SANTA ROSA ENERGY LLC-PSD Desc: PSD - New combined cycle c |
| Type/Sub/Req: AC /1A PSD or NAA \$7500 Logged: 09-JUL-1998 |
| Received: 08-JUL-1998 Issued: Expires: OGC: |
| Fee: 7500.00 Fee Recd: Dele: Override: NONE |

+----- Related Party -----+

| Role: APPLICANT Begin: 09-JUL-1998 End: |
| Name: SHIELD, JAMES J Company: SANTA ROSA ENERGY |
| Addr: 650 DUNDEE ROAD, SUITE 150 |
| City: NORTHBROOK State: NJ Zip: 60062- Country: USA |
| Phone: 847-559-9800 Fax: 847-559-1805 |

+----- Processors -----+

| Processor: HERON_T Y Active: 09-JUL-1998 Inactive: |

Enter Project Name.

Count: 1 v

<Replace>

```

aor segment | aor seG poll | sIp segpoll | aor Poll | Activity | >
-----
AOR & SIP
-----
+-----+
| POINT AIRS ID 0250020 OFFICE SEDA SE: DADE |
| NAME TARMAC FLORIDA COUNTY DADE |
| OWNER TARMAC FLORIDA |
+-----+
| EU ID 006 Desc:142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P. |
+-----+
| CA AOR Activity AOR ANNUAL OPERATIN Done Due 30-SEP-1998 CS IN |
+-----+
| AOR Pollutant |
+-----+
| Pollutant/Emis Method Act Emis Sum Actual Annual Emission Calculat |
+-----+
| PM Particulate Matter - 159.970000TPY |
| 1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION MEASUREMENT |
| PM10 Particulate Matter - 135.970000TPY |
| 5 CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM. |
| SO2 Sulfur Dioxide 631.840000TPY |
| 1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION MEASUREMENT |
+-----+
| Pollutant:SO2 Allowable Emissions (TPY): 1752.000000 |
+-----+
Enter Pollutant Code ^
Count: *4 <List><Replace>

```


Allowable | poll Test | test Meth | History | Return | eXit

Emission Unit Pollutant -----

POINT AIRS ID 0250020 OFFICE SEDA SE: DADE
NAME TARMAC FLORIDA COUNTY DADE
OWNER TARMAC FLORIDA

EU ID 006 Desc 142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P.

Pollutant NOX Nitrogen Oxides
Status A ACTIVE # Allow 001 % Control Efficiency
-----Allowable-----

Future Eff Date Allow Seq 001 # of Tests 007
Allow Emission 6.770000 Unit 09 POUNDS PER TON OF PRODUCT
Equivalent 592.000000 Lb/Hr 2592.960000 Ton/Yr *check!*

Compliance Meth
Basis Allowable ESCPSD allow facility/modification to escape PSD precons
Regulation Compl Meth Code 99 OTHER
Compl Test Freq 0 NONE REQUIRED Freq Base Date
Allow Comment

Enter the date Allowable becomes Effective from
Count: *1 <Replace>

```
poll Test | Chg fac/poll | Oper rates | Activity | reLink | Return | >
-----
Emission Unit Pollutant Test
-----
+-----+
| AIRS ID 0250020          OFFICE SEDA    SE: DADE        |
| OWNER TARMAC FLORIDA     NAME TARMAC FLORIDA |
| EU ID 006 Description 142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P. |
| CA      Activity          Due           Done           CS |
+-----+
|  Pollutant NOX          Nitrogen Oxides          Allow Seq 001 |
| Comp Test Fr NONE REQUIRED          Freq Base Dt |
+-----+
| Test Date 03-DEC-1997     Audit Type 3 TYPE III-STACK TEST REVIEW    Result P |
| Receive Dt 26-JAN-1998     Review Dt 12-FEB-1998    Next Test Dt 02-DEC-1999 |
| Test Point |
| Test Meth              Team 1 Air Consulting and Engineering |
+-----+
| Test Allow      6.770000 |
| Actual         5.820000   Unit 09 POUNDS PER TON OF PRODUCT |
| Permit Allow   6.770000   Unit 09 POUNDS PER TON OF PRODUCT |
|                                     % of Test Actual Above/Below Test Allow  -14.03 |
| Comment NOX emissions averaged 355.6 Pounds per Ton. |
+-----+
Enter Test Date
Count: 1           v           <Replace>
```

Allowable	poll Test	test Meth	History	Return	eXit
		Emission Unit	Pollutant		

POINT AIRS ID 0250020	OFFICE SEDA	SE: DADE			
NAME TARMAC FLORIDA			COUNTY DADE		
OWNER TARMAC FLORIDA					

EU ID 006	Desc 142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P.
-----------	---

Pollutant NOX	Nitrogen Oxides				
Status A ACTIVE	# Allow 001	% Control Efficiency			
Pri Cont	Sec Cont				
Reg Class					

Potential Emission	592.000000Lb/Hr	2592.960000Ton/Yr	Synth Ltd		
Emission Method 1	CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION				
Emission Factor	Act Emis	1953.450000Tons/Yr	Year 1997		
Unit	Emis Fac Ref				
Emis Calculation					
Est Fugitive Lower	Upper	Tons/Yr			
Pollutant Comment	(EPA LIM.)ALLOW.EMISS.BASED ON "NO INCREASE IN EMISSIONS"				

At Last Record
 Count: *1 <List><Replace>

Allowable | poll Test | test Meth | History | Return | eXit

 Emission Unit Pollutant

POINT AIRS ID 0250020 OFFICE SEDA SE: DADE
 NAME TARMAC FLORIDA COUNTY DADE
 OWNER TARMAC FLORIDA

EU ID 006 Desc 142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P.

Pollutant PM10 Particulate Matter - PM10
 Status A ACTIVE # Allow 000 % Control Efficiency
 Pri Cont Sec Cont
 Reg Class

Potential Emission	Lb/Hr	Ton/Yr	Synth Ltd
Emission Method			
Emission Factor	Act Emis	135.970000Tons/Yr	Year 1997
Unit		Emis Fac Ref	
Emis Calculation			
Est Fugitive Lower	Upper	Tons/Yr	
Pollutant Comment			

Enter Pollutant Code
 Count: *1 <List><Replace>

Allowable	poll Test	test Meth	History	Return	eXit
		Emission Unit	Pollutant		

POINT AIRS ID 0250020	OFFICE SEDA	SE: DADE			
NAME TARMAC FLORIDA			COUNTY DADE		
OWNER TARMAC FLORIDA					

EU ID 006	Desc 142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P.
-----------	---

Pollutant PM10	Particulate Matter - PM10		
Status A ACTIVE	# Allow 000	% Control Efficiency	

-----Allowable-----		
Future Eff Date	Allow Seq	# of Tests
Allow Emission	Unit	
Equivalent	Lb/Hr	Ton/Yr

Compliance Meth		
Basis Allowable		
Regulation	Compl Meth Code	
Compl Test Freq	Freq Base Date	
Allow Comment		

Enter the date Allowable becomes Effective from
 Count: *0 <Replace>

Allowable | poll Test | test Meth | History | Return | eXit

Emission Unit Pollutant -----

+-----+
POINT AIRS ID 0250020 OFFICE SEDA SE: DADE
NAME TARMAC FLORIDA COUNTY DADE
OWNER TARMAC FLORIDA
+-----+

EU ID 006 Desc 142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P.
+-----+

Pollutant SO2 Sulfur Dioxide
Status A ACTIVE # Allow 001 % Control Efficiency
Pri Cont Sec Cont
Reg Class
+-----+

Potential Emission 400.000000Lb/Hr 1752.000000Ton/Yr Synth Ltd
Emission Method 1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION
Emission Factor Act Emis 631.840000Tons/Yr Year 1997
Unit Emis Fac Ref
Emis Calculation
Est Fugitive Lower Upper Tons/Yr
Pollutant Comment ALLW=4.6 X 87.5=402.5(#/HR), PERMT ALLW NOT MORE THAN 400#
+-----+

Enter Pollutant Code
Count: *1 <List><Replace>

poll Test | Chg fac/poll | Oper rates | Activity | reLink | Return | >
----- Emission Unit Pollutant Test -----

+-----+
| AIRS ID 0250020 OFFICE SEDA SE: DADE |
| OWNER TARMAC FLORIDA NAME TARMAC FLORIDA |
| EU ID 006 Description 142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P. |
| CA Activity Due Done CS |
+-----+

| Pollutant SO2 Sulfur Dioxide Allow Seq 001 |
| Comp Test Fr ANNUALLY Freq Base Dt 31-DEC-1987 |
+-----+

| Test Date 03-DEC-1997 Audit Type 3 TYPE III-STACK TEST REVIEW Result P |
| Receive Dt 26-JAN-1998 Review Dt 12-FEB-1998 Next Test Dt 31-DEC-1998 |
| Test Point |
| Test Meth Team 1 Air Consulting and Engineering |
+-----+

| Test Allow 4.600000 |
| Actual 2.250000 Unit 09 POUNDS PER TON OF PRODUCT |
| Permit Allow 4.600000 Unit 09 POUNDS PER TON OF PRODUCT |
| % of Test Actual Above/Below Test Allow -51.09 |
| Comment SO2 emissions averaged 197.49 pounds per hour. |
+-----+

Enter Test Date
Count: 1 v <Replace>

1997

POINT AIRS ID 0250020 OFFICE SEDA SE: DADE
 NAME TARMAC FLORIDA COUNTY DADE
 OWNER TARMAC FLORIDA

1997

EU ID 006 Desc:142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P.

CA AOR Activity AOR ANNUAL OPERATIN Done Due 30-SEP-1998 CS IN

 AOR Pollutant

Pollutant/Emis Method Act Emis Sum Actual Annual Emission Calculat

NOX	Nitrogen Oxides	1953.450000TPY	
	1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION MEASUREMENT		
PM	Particulate Matter -	159.970000TPY	
	1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION MEASUREMENT		
PM10	Particulate Matter -	135.970000TPY	
	5 CALCULATED USING EMISSION FACTOR OTHER THAN AP-42/FIRE SYSTEM.		

Pollutant:NOX Allowable Emissions (TPY): 2592.960000

Enter Pollutant Code
 Count: 3 v <List><Replace>

	1997	1996	1997
TPY NOx	1953.45	1454.87	1704.16
TPY SO2	631.84	1792.13	1923.91
TPY PM	159.97		
TPY PM10	135.97		


```

+-----+
| POINT AIRS ID 0250020   OFFICE SEDA   SE: DADE   |
| NAME TARMAC FLORIDA     COUNTY DADE   |
| OWNER TARMAC FLORIDA   |
+-----+
  
```

```

+-----+
| EU ID 006 Desc:142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P. |
+-----+
  
```

```

+-----+
| CA      Activity                Done                Due                CS                |
+-----+
|          |          |          |          |          |
|-----+-----+-----+-----+-----+-----+
| Pollutant/Emis Method          Act Emis Sum    Actual Annual Emission Calculat |
+-----+-----+-----+-----+-----+
  
```

```

| NOX      Nitrogen Oxides          1454.870000TPY |
|          1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION MEASUREMENT |
| PM       Particulate Matter -      80.540000TPY |
|          1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION MEASUREMENT |
| SO2     Sulfur Dioxide             1292.130000TPY |
|          1 CALCULATED BASED ON SOURCE TEST OR CONTINUOUS EMISSION MEASUREMENT |
+-----+
  
```

```

|          Pollutant:NOX                Allowable Emissions (TPY): 2592.960000 |
+-----+
  
```

Enter Pollutant Code
 Count: *3

<List><Replace>

year 1996

aor segment | aor seG poll | sIp seg poll | aor Poll | Activity | >
----- AOR & SIP -----

POINT AIRS ID 0250020 OFFICE SEDA SE: DADE
NAME TARMAC FLORIDA COUNTY DADE
OWNER TARMAC FLORIDA

EU ID 006 Desc:142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P.

CA AOR Activity AOR ANNUAL OPERATIN Done Due 30-SEP-1998 CS IN

Year:1997 Oper:Y County:DADE Receive Dt:04-MAR-1998 Review Dt:01-JUL-1998

Permitted Operating:24 Hours/Day Average Operating:24 Hours/Day
Permitted Operating:7 Days/Week Average Operating:7 Days/Week
Permitted Operating:8760 Hours/Year Total Operation:7654 Hours/Year
Average % Operation by Season: DJF: 25 MAM: 25 JJA: 25 SON: 25
AOR & SIP Comment:

Ozone Season Adjustment Factor: Base Year Unit [Y/N]:Y
Average Ozone Season Operation: Hours/Day Days/Week

Enter AOR & SIP Year 'YYYY'
Count: *1

<Replace>

```

aor segment | aor seG poll | sIp seg poll | aor Poll | Activity | >
-----
AOR & SIP
-----
+-----+
| POINT AIRS ID 0250020 OFFICE SEDA SE: DADE |
| NAME TARMAC FLORIDA COUNTY DADE |
| OWNER TARMAC FLORIDA |
+-----+
| EU ID 006 Desc:142 TPH KILN #3 W/DROPOUT BOX& DUAL CHAMBER E.S.P. |
+-----+
| CA Activity Done Due CS |
+-----+
| Year:1996 Oper:Y County:DADE Receive Dt:03-APR-1997 Review Dt:11-JUN-1997 |
+-----+
| Permitted Operating:24 Hours/Day Average Operating:24 Hours/Day |
| Permitted Operating:7 Days/Week Average Operating:7 Days/Week |
| Permitted Operating:8760 Hours/Year Total Operation:7858 Hours/Year |
| Average % Operation by Season: DJF: 25 MAM: 25 JJA: 25 SON: 25 |
| AOR & SIP Comment: |
+-----+
| Ozone Season Adjustment Factor: Base Year Unit [Y/N]:Y |
| Average Ozone Season Operation: Hours/Day Days/Week |
+-----+
Enter AOR & SIP Year 'YYYY'
Count: *1 <Replace>

```

History | Fugitive | Poten Emis | Capped EU | Return | eXit

----- Facility Pollutant -----

POINT AIRS ID 0250020	OFFICE SEDA	SE: DADE
NAME TARMAC FLORIDA		COUNTY DADE
OWNER TARMAC FLORIDA		

Pollutant SAM	Sulfuric Acid Mist
Poll Class B	ACTUAL AND POTENTIAL EMISSIONS BELOW ALL APPLICABLE MAJOR SOURCE THRESHOLDS

Emission CAP	Pounds/Hr	Tons/Yr
Basis		
Regulation		
Comment		

Act Emis Year1997	Actual Emission	0.620000Tons/Yr
Potential Sum	23.060000Tons/Yr HAP Pot SubTotal	0.000000Tons/Yr

Enter Pollutant Code
 Count: 6 ^ v

<List><Replace>

History | Fugitive | Poten Emis | Capped EU | Return | eXit
 ----- Facility Pollutant -----

POINT AIRS ID 0250020 OFFICE SEDA SE: DADE
 NAME TARMAC FLORIDA COUNTY DADE
 OWNER TARMAC FLORIDA

Pollutant PM10 Particulate Matter - PM10
 Poll Class B ACTUAL AND POTENTIAL EMISSIONS BELOW ALL APPLICABLE MAJOR
 SOURCE THRESHOLDS

Emission CAP	Pounds/Hr	Tons/Yr
Basis		
Regulation		
Comment		

Act Emis Year1997	Actual Emission	249.600000Tons/Yr
Potential Sum	55.690000Tons/Yr HAP Pot SubTotal	0.000000Tons/Yr

Enter Pollutant Code
 Count: 5 ^ v

<List><Replace>

History | Fugitive | Poten Emis | Capped EU | Return | eXit

----- Facility Pollutant -----

POINT AIRS ID 0250020	OFFICE SEDA	SE: DADE
NAME TARMAC FLORIDA		COUNTY DADE
OWNER TARMAC FLORIDA		

Pollutant CO Carbon Monoxide
 Poll Class B ACTUAL AND POTENTIAL EMISSIONS BELOW ALL APPLICABLE MAJOR
 SOURCE THRESHOLDS

Emission CAP	Pounds/Hr	Tons/Yr
Basis		
Regulation		
Comment		

Act Emis Year1997	Actual Emission	52.180000Tons/Yr
Potential Sum	1367.100000Tons/Yr HAP Pot SubTotal	0.000000Tons/Yr

Enter Pollutant Code

Count: 4 v

<List><Replace>

History | Fugitive | Poten Emis | Capped EU | Return | eXit

----- Facility Pollutant -----

POINT AIRS ID 0250020 OFFICE SEDA SE: DADE
NAME TARMAC FLORIDA COUNTY DADE
OWNER TARMAC FLORIDA

Pollutant NOX Nitrogen Oxides
Poll Class A ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE
MAJOR SOURCE THRESHOLDS.

Emission CAP Pounds/Hr Tons/Yr
Basis
Regulation
Comment

Act Emis Year1997 Actual Emission 2714.280000Tons/Yr
Potential Sum 3065.300000Tons/Yr HAP Pot SubTotal 0.000000Tons/Yr

Enter Pollutant Code
Count: 4 ^ v

<List><Replace>

History | Fugitive | Poten Emis | Capped EU | Return | eXit

----- Facility Pollutant -----

POINT AIRS ID 0250020	OFFICE SEDA	SE: DADE
NAME TARMAC FLORIDA		COUNTY DADE
OWNER TARMAC FLORIDA		

Pollutant PM Particulate Matter - Total
 Poll Class A ACTUAL OR POTENTIAL EMISSIONS ARE ABOVE THE APPLICABLE
 MAJOR SOURCE THRESHOLDS.

Emission CAP	Pounds/Hr	Tons/Yr
Basis		
Regulation		
Comment		

Act Emis Year1997	Actual Emission	318.340000Tons/Yr
Potential Sum	970.098000Tons/Yr HAP Pot SubTotal	0.000000Tons/Yr

Enter Pollutant Code

Count: 4 ^ v

<List><Replace>

Date: 7/13/98 9:37:36 AM
From: Alvaro Linero TAL
Subject: Tarmac Conversion to Dry Cement Process
To: See Below

Teresa. Please review the application received June 30 by Miami-Dade DERM to convert the three wet process cement kilns at Tarmac in Medley to the dry process. Provide comments directly to Eva Kunath regarding PSD applicability or on any information required to make that determination. Consider anything related to reconstruction from an NSPS or PSD point of view. Tarmac believes they net out of PSD. If so, then Miami-Dade DERM will process the application.

Cindy. I note that the source is major for HAPS (HCl > 10 TPY, HAPS > 25 TPY). Please send Eva any comments advising on the applicability of any MACT/NESHAP or questions to determine applicability. I will send you a copy of the key parts of the application. See Teresa if you want to look at the whole thing.

John (and Beth). I'll send you the key parts of the application. Feel free to submit any comments directly to Miami-Dade DERM.

Day 30 for Miami-Dade DERM is July 30. I suggest sending Eva your comments by July 24 if not sooner. Please interact directly with Eva on this. Thank you. Al Linero.

To: Teresa Heron TAL
To: Cindy Phillips TAL
To: John Glunn TAL
CC: Scott Sheplak TAL
CC: Larry George TAL
CC: Elizabeth Hardin TAL
CC: Clair Fancy TAL
CC: Matilde Kunath MIAMI
CC: Frank Echanique MIAMI
CC: Ewart Anderson MIAMI

Tarmac { 050
 142
 142A
 236
 230
 175 } K1