

P 062 921 963



Receipt for Certified Mail

No Insurance Coverage Provided
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(See Reverse)

PS Form 3800, June 1991

Sender's Name	Don Kelley
Street and No.	Shelburne, Vt
P.O., State and ZIP Code	Brooksville, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	2-1-93 AC 27-212352 PSD-FL-188

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. Show to whom, date and address of delivery.
2. Restricted Delivery.

3. Article Addressed to:
Don Kelley, Plant Mgr.
Shelburne, Vt.
P O BOX 6
Brooksville, FL 34605-0006

4. Type of Service:	Article Number
<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input checked="" type="checkbox"/> Express Mail	P062 921 96

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X

6. Signature - Agent
X *H. Stevenson*

7. Date of Delivery
2/3/93

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

In the matter of an
Application for Permits by:

DER File No. AC 27-212252
PSD-FL-188
Hernando County

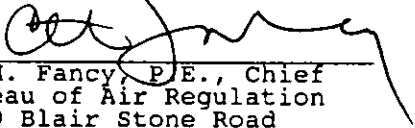
Mr. Don Kelly
Plant Manager
Southdown, Inc. dba FM&M
Post Office Box 6
Brooksville, Florida 34605-0006

Enclosed is Permit Number AC 27-212252, PSD-FL-188, to allow in increase in the NOx allowable emissions for the No. 2 cement kiln at the existing Southdown, Inc. facility in Brooksville, Hernando County, Florida. This permit is issued pursuant to Section(s) 403, Florida Statutes.

Any party to this Order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

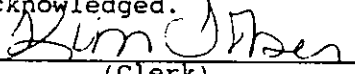

C. H. Fancy, P.E., Chief
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400
904-488-1344

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 2-1-93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to
§120.52(11), Florida Statutes,
with the designated Department
Clerk, receipt of which is hereby
acknowledged.


Kim Jones 2-1-93
(Clerk) (Date)

Copies furnished to:

B. Thomas, SW District
J. Koogler, P.E., K&A
J. Harper, EPA
J. Bunyak, NPS
C. Hetrick, HCBCC
D. Beason, Esq., DER
D. Dee, Esq., CFWES&C

Final Determination

Southdown, Inc./dba Florida Mining & Materials
Hernando County
Brooksville, Florida

Construction Permit No.
AC 27-212252
PSD-FL-188

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

January 12, 1993

Final Determination

Southdown, Inc./dba Florida Mining & Materials

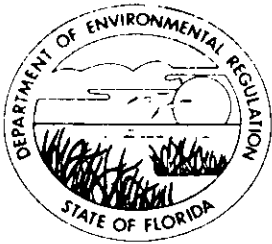
Hernando County

AC 27-212252

PSD-FL-188

The construction permit application package has been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Tampa Tribune on November 26, 1992. The Technical Evaluation and Preliminary Determination of the construction permits was distributed on November 12, 1992, and available for public inspection at the Department's Southwest District office and Bureau of Air Regulation office and the Hernando County Government Center Planning office.

There were no comments received during the public notice period. Therefore, it is recommended that the construction permit be issued as drafted.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:

Southdown, Inc. dba
Florida Mining & Materials
P. O. Box 6
Brooksville, Florida
34605-0006

Permit Number: AC 27-212252
PSD-FL-188

Expiration Date: December 31, 1993

County: Hernando

Latitude/Longitude: 28°38'34"N
82°28'25"W

Project: No. 2 Cement Kiln
Modification

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.); Florida Administrative Code (F.A.C.) Chapters 17-210 thru 17-297 and 17-4; and, 40 CFR (July, 1991 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the No. 2 cement kiln to allow a significant increase in nitrogen oxides (NOx) above the previous actuals (625.4 TPY vs. 1025 TPY). The kiln's primary fuel is coal having a maximum allowable sulfur content of 1%, by weight. Flolite, a re-refined oil blend, is used as a backup fuel and during startups, shutdowns, and malfunctions. The kiln has a maximum process input rate of 130 tons per hour (clinker product weight of 79.6 tons per hour), 30-day rolling average, and a maximum heat input rate of 300.0 MMBtu/hr. A Fuller Reverse Air baghouse control system is used to control particulate matter and visible emissions. The facility is located in Brooksville, Hernando County, Florida. The UTM coordinates are Zone 17, 356.0 km East and 3169.9 km North.

The Source Industrial Code: 3241 Cement Manufacturing

The Source Classification Code numbers are:

- o 3-05-006-06 Cement Mfg-Dry Process Tons Cement Produced
- o 3-90-002-01 Bitum. Coal-Cement Kiln Tons Burned
- o 3-90-013-89 Liquid Waste-General 1000 Gals Burned

The source shall be modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Southdown, Inc. dba Florida Mining & Materials application received on April 22, 1992.
2. DER's transmittal letter of April 23, 1992.

PERMITTEE:
Southdown, Inc. dba
Florida Mining and Materials

Permit Number: AC 27-212252
PSD-FL-188
Expiration Date: December 31, 1993

Attachments cont.:

3. Dr. John B. Koogler's letter with enclosure received May 5, 1992.
4. Mr. James W. Pulliam, Jr.'s letter received via the FAX on May 15, 1992.
5. Mr. Charles B. Hetrick's letter received May 20, 1992.
6. Mr. C. H. Fancy's incompleteness letter with attachments mailed May 22, 1992.
7. Mr. Howard L. Rhodes's letter with enclosure mailed June 2, 1992.
8. Dr. John B. Koogler's letter with enclosures received June 24, 1992.
9. FAX received July 24, 1992, from Mr. Pradeep Raval.
10. FAX received July 24, 1992, from Mr. Gary Maier.
11. Mr. Charles B. Hetrick's letter received July 27, 1992.
12. Mr. James W. Pulliam, Jr.'s letter received August 20, 1992.
13. Technical Evaluation and Preliminary Determination dated September 21, 1992.
14. Dr. John B. Koogler's letter received October 14, 1992.
15. Dr. John B. Koogler's received October 19, 1992.
16. Response from the National Park Service received via the phone on October 20, 1992, by Mr. Preston Lewis.
17. Mr. Brian L. Beals's letter received October 21, 1992.
18. Revised Technical Evaluation and Preliminary Evaluation dated October 28, 1992.
19. Public Notice received December 18, 1992.
20. Mr. Brian L. Beals's letter received January 8, 1993.
21. Final Determination dated January 12, 1993.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

PERMITTEE:
Southdown, Inc. dba
Florida Mining and Materials

Permit Number: AC 27-212252
PSD-FL-188
Expiration Date: December 31, 1993

GENERAL CONDITIONS:

This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

PERMITTEE:
Southdown, Inc. dba
Florida Mining and Materials

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PSD-FL-188
Expiration Date: December 31, 1993

GENERAL CONDITIONS:

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and,
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with F.A.C. Rules 17-4.120 and 17-30.300, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit constitutes compliance with:

- a. New Source Performance Standards (NSPS), 40 CFR 60.60, Subpart F, Portland Cement Plants;
- b. Prevention of Significant Deterioration; and,
- c. Best Available Control Technology (BACT).

PERMITTEE:
Southdown, Inc. dba
Florida Mining and Materials

Permit Number: AC 27-212252
PSD-FL-188
Expiration Date: December 31, 1993

GENERAL CONDITIONS:

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and,
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The annual hours of operation of the No. 2 cement kiln shall not exceed 8200.

2. The No. 2 kiln's total process feed rate shall not exceed 130 tons per hour (wet basis), yielding a maximum clinker product weight of 79.6 tons per hour (dry basis), averaged on a rolling 30-day production period.

PERMITTEE:
Southdown, Inc. dba
Florida Mining and Materials

Permit Number: AC 27-212252
PSD-FL-188
Expiration Date: December 31, 1993

SPECIFIC CONDITIONS:

3. The No. 2 kiln's fuel input rate shall not exceed 300.0 MMBtu per hour. The sulfur content of the coal shall not exceed 1.0 percent, by weight, using ASTM D3177-75. Coals with heating values lower than 12,500 Btu per pound shall be fired only if the sulfur content to heat value ratio of the coal does not exceed 0.83 pounds of sulfur per MMBtu of heat input.

4. The total combined times when using Flolite, a re-refined oil blend, during startup periods (no coal used), idle times (maximum allowable process heat input of 300.0 MMBtu maintained but no process feed input), and as a limited supplemental fuel with coal (coal unable to sustain maximum allowable process heat input requirement), shall not exceed 250 hours per year. The Flolite shall not contain more than 1 percent sulfur, by weight. The maximum allowable Flolite usage rate is 2069 gals/hr (@ 145,000 Btu/gal). At all times, the Flolite shall contain no higher concentration of metals or toxics than the following:

Cadmium - 0.3 ppm; Lead - 5.0 ppm; and, Arsenic - 1.0 ppm.

5. Emissions from the No. 2 cement kiln shall not exceed the following:

Pollutant	Maximum Allowable Emissions	
	lbs/hr	tons per year
PM	13.5	55.35
SO ₂	11.5	47.15
NOx	250.0, 30-day avg.	1025.0
VOC	7.4	30.34
CO	64.0	262.4
VE	< 10% opacity	

Note: Except for NOx, the emission limitations were established in construction permit No. AC 27-173474 (PSD-FL-124A), issued July 20, 1990.

6. Annual compliance shall be demonstrated, in accordance with F.A.C. Rule 17-297 and 40 CFR 60, Appendix A (July, 1991 version), using the following:

- EPA Method 5 for PM (particulate matter)
- EPA Method 6 or 6C for SO₂ (sulfur dioxide)
- EPA Method 7E for NOx (nitrogen oxides; continuous 30-day period average)
- EPA Method 9 for VE (visible emissions)
- EPA Method 10 for CO (carbon monoxide)
- EPA Method 25A for VOC (volatile organic compounds)

PERMITTEE:
Southdown, Inc. dba
Florida Mining and Materials

Permit Number: AC 27-212252
PSD-FL-188
Expiration Date: December 31, 1993

SPECIFIC CONDITIONS:

7. The No. 2 kiln's total process input rate and clinker production rate shall be monitored and recorded daily in accordance with 40 CFR 60.63. The coal feed rate to the kiln and the average coal sulfur content and heating value (Btu/lb) of each coal shipment shall be determined and recorded. If coal of sulfur content exceeding 1.0 percent, by weight, is fired in the kiln, (due to variability in the sulfur content of coal within a shipment) samples will be taken of coal entering the kiln at a minimum frequency of once per hour and analyzed for sulfur content. The average sulfur content of samples taken within each 3-hour period shall not exceed 1.0 percent, by weight.

8. The permittee shall comply with all of the applicable provisions and requirements of F.A.C. Chapters 17-210 thru 17-297 and 17-4; and, 40 CFR (July, 1991 version).

9. The DER's Southwest District office shall be notified in writing at least 15 days prior to compliance testing. Test reports shall be submitted to the DER's Southwest District office within 45 days of compliance test completion.

10. A continuous kiln exhaust gas oxygen monitor and data recorder shall be operated, calibrated and maintained. Data from the recorder shall be kept on file for the previous two years of operation and made available upon request.

11. The permittee shall apply reasonable work practices to minimize fugitive PM emissions, including the following:

- a. All permanent haul roads shall be paved;
- b. Temporary haul roads shall be watered or treated with chemical dust suppressants at regular intervals;
- c. All non-covered raw materials storage areas shall be maintained so as to minimize PM fugitive emissions;
- d. Coal stored at or above natural grade shall be compacted, turned and/or watered as necessary to minimize fugitive PM emissions from the pile, and aligned with the predominant wind direction to minimize wind erosion;
- e. Abandoned haul roads and other disturbed areas shall be revegetated within 60 days of the date active service ends; and,
- f. All cement products shall be transferred to transport trucks through a loading spout.

PERMITTEE:
Southdown, Inc. dba
Florida Mining and Materials

Permit Number: AC 27-212252
PSD-FL-188
Expiration Date: December 31, 1993

SPECIFIC CONDITIONS:

12. Any change in the method of operation, fuels, equipment, startup, or operating hours, pursuant to the F.A.C Rule 17-296.200, Definitions-Modification, shall be submitted for evaluation and approval to the DER's Bureau of Air Regulation (BAR) office.

13. The No. 2 kiln and its associated equipment are subject to the applicable provisions of F.A.C. Rules 17-210.650: Circumvention; 17-210.700: Excess Emissions; and, 17-4.130: Plant Operations-Problems.

14. Specific conditions of this permit supercedes those of the current permit No. AC 27-173474.


15. An annual operation report (AOR) shall be submitted to the Department's Southwest District office by March 1 reporting the kiln's averaged process input rate and clinker production of each month of the previous year. The AOR shall contain the total time that the kiln was firing Flolite during the previous year.

16. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAR prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

17. An application for an operation permit must be submitted to the DER's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed and noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rules 17-4.055 and 17-2.220).

Issued this 26th day
of January, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Carol M. Browner, Secretary

Best Available Control Technology (BACT) Determination
Southdown, Inc. dba Florida Mining & Materials
Hernando County

The applicant proposes an increase in the allowable nitrogen oxide (NOx) emission limitation to 250 lbs/hr (8200 hrs/yr), which results in a significant increase in emissions. The purpose for the increase is to adjust the cement kiln's allowable limit upward to compensate for potential peaks in NOx emissions that would be in violation with the current allowable limitation of 162.3 lbs/hr (8200 hrs/yr). Due to source obligation, the base limitation used for evaluation purposes was 158.4 lbs/hr (7896 hrs/yr). The facility is located in an area designated attainment for all of the criteria pollutants.

The applicant has indicated the maximum net change in pollutant emissions is as follows:

<u>Pollutant</u>	<u>Max. Net Increase in Emissions (TPY)</u>	<u>PSD Significant Emission Rate (TPY)</u>
NOx	399.6	40

Rule 17-2.500(2)(f)(3) of the Florida Administrative Code (F.A.C.) requires a BACT review of all regulated pollutants emitted in an amount equal to or greater than the significant rates listed in Table 500-2, F.A.C. Chapter 17-2.

BACT Determination Requested by the Applicant:

No. 2 Cement Kiln

NOx 250 lbs/hr, 30-day average

Date of Receipt of a BACT Application:

April 22, 1992

Review Group Members:

This determination was based on comments received from the applicant and the Permitting and Standards Section.

BACT Determination Procedure

In accordance with Florida Administrative Code Chapter 17-2, Air Pollution, this BACT determination is based on the maximum degree of reduction of each pollutant emitted which the Department, on a case by case basis, taking into account energy, environmental and economic impacts, and other costs, determines is achievable through application of production processes and available methods, systems, and techniques. In addition, the regulations state that in making the BACT determination the Department shall give consideration to:

- (a) Any Environmental Protection Agency determination of Best Available Control Technology pursuant to Section 169, and any emission limitation contained in 40 CFR Part 60 (Standards of Performance for New Stationary Sources) or 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (b) All scientific, engineering, and technical material and other information available to the Department.
- (c) The emission limiting standards or BACT determinations of any other state.
- (d) The social and economic impact of the application of such technology.

The EPA currently stresses that BACT should be determined using the "top-down" approach. The first step in this approach is to determine for the emission source in question the most stringent control available for a similar or identical source or source category. If it is shown that this level of control is technically or economically infeasible for the source in question, then the next most stringent level of control is determined and similarly evaluated. This process continues until the BACT level under consideration cannot be eliminated by any substantial or unique technical, environmental, or economic objections.

BACT Analysis:

A. No. 2 Cement Kiln

NOx emissions potentially can be controlled by post-combustion reduction systems (i.e., selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR)). Such add-on systems have been proposed or recommended for such source categories as municipal

BACT Determination
Southdown Inc., dba FM&M
AC 27-212252 & PSD-FL-188
Page 4

Details of the Analysis May be Obtained by Contacting:

Bruce Mitchell, Permitting Engineer
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400


Recommended by:



C. H. Fancy, P.E., Chief
Bureau of Air Regulation

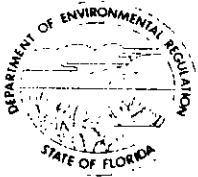
January 14, 1993
Date

Approved by:



Carol M. Browner, Secretary
Dept. of Environmental Regulation


Jan 26, 1993
Date



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol Browner
FROM: Howard L. Rhodes 
DATE: January 11, 1993
SUBJ: Approval of Construction Permit No. AC 27-212252
PSD-FL-188
Southdown, Inc./dba Florida Mining & Materials

Attached for your approval and signature is a construction permit prepared by the Bureau of Air Regulation for the above referenced company to allow an increase in the NOx allowable emissions for the No. 2 cement kiln.

Southdown, Inc./dba FM&M is a major existing facility that produces cement from raw materials. The facility is located off U.S. Highway 98 northwest of Brooksville, Hernando County, Florida.

On November 7, 1988, FM&M received a construction permit (AC 27-138850 and PSD-FL-124) for the No. 2 cement kiln, which included a PSD-BACT determination. The BACT established a NOx emission limitation of 250 lbs/hr. In 1989, FM&M applied for a modification to the No. 2 cement kiln, which required an evaluation of previous actual emissions to future allowable emissions. Based on tests, the NOx level established as actuals was 158.4 lbs/hr and the new allowable emission limitation was established at 162.3 lbs/hr (i.e., 39.9 TPY increase; AC 27-173474: July 25, 1990). Continuous monitoring and subsequent tests have revealed that there are some fluctuations in NOx emissions under steady state operations which, at times, have placed the source in potential violation with the limitation. Consequently, FM&M has requested that the NOx emission limitation be reestablished at the previous PSD-BACT level of 250 lbs/hr, which is the purpose of this permitting activity. Modeling has shown that the 250 lbs/hr level does not violate standards or increment.

There were no comments received during the public notice period.

I recommend your approval and signature.

HLR/BM/rbm