



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7156

KA 521-92-04

October 13, 1992

RECEIVED

001 11002

Division of Air
Resources Management

Mr. Clair Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Southdown, Inc. (dba Florida Mining & Materials)
Proposed Permit Modification No. 2 Kiln
AC27-212252, PSD-FL-188

Dear Mr. Fancy:

Southdown has received the Technical Evaluation and Preliminary Determination and proposed permit modification for No. 2 cement kiln at the FM&M facility located in Brooksville, Florida.

Upon reviewing the proposed permit and technical evaluation a few items, for which changes are needed or requested, were identified. These items are noted below.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. Section I.C.

Southdown would like to clarify that the actual feed rate to the kiln is 130 tons/hr, based on a measured preheater feed rate of 145 tons/hr.

2. Section I.C.

The kiln heat input rate, stated as "300,000 MMBTU/hr", should be corrected to "300 MMBTU/hr".

3. Section I.C. - Paragraph 3

The kiln oxygen analyzer, stated as being located in the kiln exhaust, is actually located at the kiln feed inlet. The oxygen analyzer is calibrated but it is not a certified oxygen monitor. Records of the instrument calibration will be maintained and logs of the oxygen concentration data will be maintained as required by the existing and proposed permits for this source. It is assumed that FDER was referring to the system presently in place and that a new analyzer is not being required by the permit. Use of the existing oxygen analyzer would be accurately reflected by modifying the phrase "in the stack" to "in the kiln inlet." It should be noted that the combustion gases from the process leave the kiln at the kiln inlet.

4. Section II - Paragraph 8A

The oxygen analyzer is incorrectly referred to as a CEM (see Item 3). Please modify the paragraph to read:

"The kiln exhaust gas oxygen analyzer located at the kiln inlet shall be calibrated, operated"

5. Section III - Paragraph 5

The cost of installing and maintaining a NOx CEM on a year-round basis does not seem to be justified. It is requested that FDER allow demonstration of compliance with the NOx emission limit by the use of a NOx analyzer to determine the NOx emissions based on a 30-day average. This would allow FDER to ensure that the kiln operation is in compliance with the permit limit while avoiding the expenditure of purchasing a NOx CEM system for the kiln. Thus, it is requested that this paragraph be modified as follows:

"... For compliance verification purposes, a 30-day test for NOx emissions shall be conducted within 30 days of the issuance of this permit and annually thereafter. Testing shall be in accordance with the requirements of the permit."

PERMIT NO. AC27-212252, PSD-FL-188

6. Specific Condition No. 3

The basis for the kiln maximum fuel input rate is listed in this condition. It is preferred that this basis ("24,000 lbs/hr of coal with a heating value of 12,500 BTU/lb") be deleted from this permit condition. This would serve to prevent confusion in the future, since these numbers may be mistakenly applied as additional permit limits on the kiln heat input.

7. Specific Condition No. 5

The tons per year of allowable SO₂ emissions were stated as 47.0 tons/year SO₂ in the existing permit instead of 47.15 tons/year. A correction of this error in the proposed permit at this time seems appropriate.

8. Specific Condition No. 6

It is requested that the permit limit for NO_x of 250.0 lbs/hr be based on a 30-day average and that the averaging period be stated in Specific Condition No. 6.

9. Specific Condition No. 6

It is requested that EPA Method 7E be required, in place of Method 7, to allow the use of a continuous NO_x analyzer for compliance testing. Method 7E is capable of more reliable results than Method 7. We are also requesting that a 30-day average of the NO_x CEM data be used for the annual compliance test provided that the CEM calibration and maintenance during the 30-day period meet the applicable standards of 40CFR60.

10. Specific Condition No. 6

It is requested that EPA Method 6C be required, in place of Method 6, for annual SO₂ compliance testing.



11. Specific Condition No. 10

This condition refers to a CEM for oxygen and NOx concentration determination. A modification of this section is requested to reflect the present monitoring system. The following language is suggested:

"Emissions of NOx will be minimized through proper operation practices. A continuous kiln exhaust gas oxygen monitor and data recorder shall be operated, calibrated and maintained. Data for the recorder shall be kept for the most recent two year period and made available upon request."

12. Specific Condition No. 11(d)

A deletion of the minimum moisture content required to the coal storage pile is requested. The "8 percent" moisture, referred to in this condition, is based on the moisture content of the delivered coal rather than the stored coal. If an 8% surface moisture content were to be maintained, the facility would be required to add quantities of moisture to the coal which would lead to operational problems such as handling and low coal heating values. This issue has previously been discussed with FDER on the existing permit for Kiln No. 2 and the following changes were agreed to with FDER:

"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 shall be aligned with the predominant wind direction to minimize wind erosion."

13. Specific Condition 11(c)

For the reasons stated above, condition 11(c), which requires the storage of all materials with less than 14% moisture to be "stored below natural grade in silos or enclosed structures;" is requested to be modified as follows:

"All non-covered raw materials storage areas shall be maintained so as to minimize particulate matter fugitive emissions."

14. Specific Condition No. 11(f)

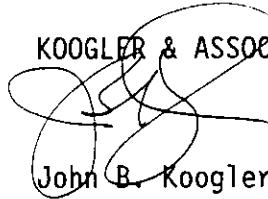
Condition 11(f) refers to a "pneumatic conveying system" for loading cement products to transport trucks. A pneumatic conveying system has never been used at this facility for truck loading. The cement is released into the truck by gravity feed through a loading spout at the base of the storage units. Emissions from the unloading operation are controlled by use of a baghouse (Permit No. A027-194633). Therefore, please modify this condition as follows:

"All cement products shall be transferred to transport trucks through a loading spout."

Please note that the requested amendments will not reduce the operational requirements for compliance with the proposed permit emission limits.

Very truly yours,

KOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:PAR:wa

c: Mr. Don Kelly, FM&M
Mr. Amarjit S. Gill, Southdown
Ms. Anetha Lue, Southdown

R. Mitchell
B. Shen...
J. Kelly
R. Mitchell

ATTACHMENT 15



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
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KA 521-92-04

October 16, 1992

RECEIVED

OCT 19 1992

Division of Air
Resources Management

Mr. Bruce Mitchell
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Southdown, Inc. (dba Florida Mining & Materials)
Proposed Permit Modification No. 2 Kiln
Permit File No. AC27-212252, PSD-FL-188
Hernando County, Florida

Dear Mr. Mitchell:

This is a follow up to our meeting on October 14, 1992, concerning the FDER Intent to Issue for the above project. The information provided below will supplement the comments submitted by Southdown on October 14.

Southdown, Inc. requests a revision to the BACT originally proposed to FDER to reflect a nitrogen oxides (NOx) emission limit of 250.0 pounds per hour, based on a 30-day average rather than the originally requested 30-day rolling average. The revised emission limit is in line with our recent comments regarding the cost associated with demonstrating compliance with a 30-day rolling average emission limit and the absence of specific state and federal regulations requiring continuous nitrogen oxides monitoring at cement plants. Southdown will conduct an annual NOx compliance test using EPA Method 7E for a 30-day period to demonstrate compliance with the above stated NOx emission limit.

The following information is submitted in support of our comments dated October 14, 1992, that FDER not require the installation and operation of a NOx Continuous Emission Monitor (CEM).

Southdown obtained cost estimates, from vendor information, for a NOx CEM. Although the following costs may vary somewhat depending on the vendor, they provide a reasonable estimate of the costs involved.

Mr. Bruce Mitchell
Florida Department of
Environmental Regulation

October 16, 1992
Page 2

NOx CEM Cost	=	\$150,000
Flowmeter Cost	=	\$ 40,000
Annual Calibration and Certification Costs	=	<u>\$ 20,000</u>
TOTAL COST (1)	=	\$210,000

(1) This total does not include annual repair and maintenance related costs, which are difficult to predict.

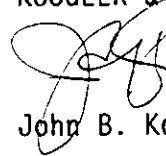
In comparison, the costs associated with a 30-day compliance test using EPA Method 7E is about \$10,000.

In addition to the high cost, as a reason for not requiring a NOx CEM, please note that a NOx CEM is not required by the federal regulations in 40CFR60, Subpart F or the state of Florida regulations under Florida Administrative Code Rule 17-2.600(7), applicable to cement kilns.

If additional information is required by FDER to support the NOx emission limit and compliance test procedure proposed above, please do not hesitate to give me a call.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:PAR:wa

c: Mr. Don Kelly, FM&M
Mr. Amarjit S. Gill, Southdown
Ms. Anetha Lue, Southdown

Handwritten notes and stamps, including a date stamp that appears to be 10/16/92.



ATTACHMENT 17



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

OCT 21 1992

4APT-AEB

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Southdown Inc., Florida Mining and Materials
PSD Permit Modification (PSD-FL-188)

Dear Mr. Fancy:

This is to acknowledge receipt of the preliminary determination and draft Prevention of Significant Deterioration (PSD) permit for the proposed modification to the above referenced facility, by your letter dated September 21, 1992. The proposed modification will increase the nitrogen oxides emission limit of the No. 2 cement kiln at the facility.

The proposed emission limit for the No. 2 cement kiln will be 250.0 pounds per hour (30-day rolling average); presently the kiln is permitted at 162.3 pounds per hour (30-day average). Southdown proposes to limit NO_x emissions through the use of proper operation practices and by controlling the excess combustion air.

We have reviewed the package as submitted and have no adverse comments. Thank you for the opportunity to review and comment on this package. If you have any questions or comments, please contact Mr. Scott Davis of my staff at (404) 347-5014.

Sincerely yours,

Brian L. Beals, Chief
Source Evaluation Unit
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

*cc: B. Mitchell
S. [unclear]
K. [unclear]
J. [unclear]
B. Mitchell, DPE
C. [unclear]
JE/PL*

RECEIVED

OCT 23 1992

Division of Air
Resources Management



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

OCT 21 1992

4APT-AEB

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

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Sincerely yours,

Brian L. Beals, Chief
Source Evaluation Unit
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

cc: B. Mitchell
C. Halladay
B. Thomas, SWDitz.
G. Koogler, P.E.
B. Mitchell, NPS
C. Petrick, HC BCC
JB/PL

RECEIVED

OCT 23 1992

Division of Air
Resources Management

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHDOWN, INC. d\b\a FLORIDA
MINING AND MATERIALS,

Petitioner,

vs.

OGC CASE NO. 92-1834

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION,

Respondent.

ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING

This cause has come before me upon receipt of a request made by Petitioner, Southdown, Inc. d\b\a Florida Mining and Materials, pursuant to Florida Administrative Code Rule 17-103.070, to grant an extension of time to file a petition for administrative hearing concerning the Department's Application No. AC27-212252. See Exhibit 1 attached.

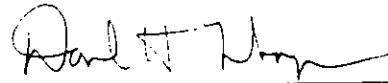
Counsel for Petitioner has discussed this request with counsel for Respondent, State of Florida Department of Environmental Regulation (DER), and the DER has no objection to it. Therefore,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until December 14, 1992, to file a petition in this matter. Filing shall be complete upon receipt by the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DONE AND ORDERED on this 19th day of October, 1992, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



DANIEL H. THOMPSON
General Counsel

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to:

John B. Koogler
4014 N.W. 13th St.
Gainesville, FL 32609

on this 21st day of October, 1992.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



W. DOUGLAS BEASON
Assistant General Counsel

2600 Blair Stone Road
Tallahassee, FL 32399-2400
Telephone: (904) 488-9730

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

OCT 5 1992
By Fax 10-2-92
Dept. of Environmental
Office of General Court

In the Matter of an Application
for Air Permit by

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

DER File No. AC27-212252

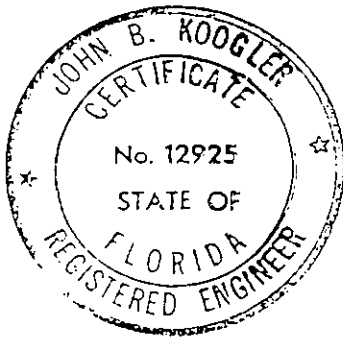
Hernando County - AP

MOTION FOR EXTENSION OF TIME

The Applicant, Southdown, Inc. by and through its undersigned Engineer of Record and pursuant to Rule 17-103.070, FAC, requests the Secretary of DER to grant a 60-day extension of time in which to file a petition. The additional time will allow Southdown to submit additional information to FDER on the No. 2 Cement Kiln permit application review.

Ms. Patty Adams of the FDER Permitting staff has indicated that she has no objection to such an extension.

Dated the 2nd day of October 1992 in Gainesville, Alachua County, Florida.



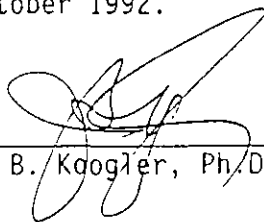
Koogler & Associates
Environmental Services

A handwritten signature in black ink, appearing to read "J. Koogler", written over a horizontal line.

John B. Koogler, Ph.D., P.E.
Florida Registration No. 12925
4014 N.W. 13th Street
Gainesville, FL 32609
(904) 377-5822
Engineer of Record for
Southdown, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Mr. Douglas Beason, OGC, DER, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Bruce Mitchell, FDER Tallahassee Office, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 and Mr. Don Kelly, Southdown, Inc., P.O. Box 6, Brooksville, Florida 34605-0006 and Ms. Anetha Lue, Southdown, Inc., 1200 Smith Street, Suite 2400, Houston, Texas 77002 by FAX and by U.S. Mail, this 2nd day of October 1992.



John B. Kogler, Ph.D., P.E.

State of Florida
Department of Environmental Regulation

District Routing Slip

To: Bill Thomas Date: 10-19-92

CC To:

	Pensacola	Northwest District	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Apalachicola	Northwest District Satellite Office	
X	Tampa	Southwest District	
	Punta Gorda	Southwest District Branch Office	
	Bartow	Southwest District Satellite Office	
	Orlando	Central District	
	Melbourne	Central District Satellite Office	
	Jacksonville	Northeast District	
	Gainesville	Northeast District Branch Office	
	Fort Myers	South District	
	Marathon	South District Branch Office	
	West Palm Beach	Southeast District	
	Port St. Lucie	Southeast District Branch Office	

Reply Optional Reply Required Info Only
Date Due _____ Date Due _____

Comments:

Comments being considered as a basis to revise and reissue the Intent package mailed out 9/21/92

From: R. Bunn Mitchell
C. H. Fancy Tel.: 278-1344

RECEIVED

OCT 19 1992

Division of Air Resources Management

Materials)

In
88

4, 1992, concerning the information provided shutdown on October 14.

originally proposed to limit of 250.0 pounds per originally requested 30- it is in line with our ed with demonstrating a limit and the absence ing continuous nitrogen [] conduct an annual NOx / period to demonstrate it.

t of our comments dated [] lation and operation of

10-31-90

Shutdown obtained cost estimates, from vendor information, for a NOx CEM. Although the following costs may vary somewhat depending on the vendor, they provide a reasonable estimate of the costs involved.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

NAME(S): Katly Hiles

DEPARTMENT/COMPANY: HCBC-Planning Dept.

DATE: 10-19-92

PHONE: 904-754-4420

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

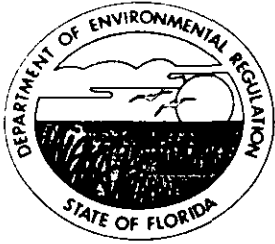
BUREAU: of Air Regulation

OFFICE PHONE: 904-488-1344 FAX PHONE: (904)922-6979

SENDER: Same

COMMENTS: Comments being considered as a basis to
revise and reissue the Intent package mailed-out
September 21, 1992

HAVE A NICE DAY!



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

NAME(S): Brian Mitchell

DEPARTMENT/COMPANY: NBS - Air

DATE: October 19, 1992

PHONE: 303-964-2822

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

BUREAU: of Air Regulation

OFFICE PHONE: 904-488-1347 FAX PHONE: (904)922-6979

SENDER: Same

COMMENTS: Comments being considered as a basis to
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September 21, 1992

HAVE A NICE DAY!



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL SHEET

NAME(S): Jewell Hanger

Gregg Worley

DEPARTMENT/COMPANY: US EPA, Region II

DATE: 10-19-92

PHONE: 404-347-3059

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 3

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

BUREAU: of Air Regulation

OFFICE PHONE: 904-487-1344 FAX PHONE: (904)922-6979

SENDER: Sam

COMMENTS: Comments being considered as a basis to
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September 21, 1992

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ENVIRONMENTAL SERVICES

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KA 521-92-04

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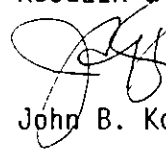
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c: Mr. Don Kelly, FM&M
Mr. Amarjit S. Gill, Southdown
Ms. Anetha Lue, Southdown



MESSAGE CONFIRMATION

OCT-19-'92 MON 14:57

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-932-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
804	10-19	14:54	00:02:08	1 904 754 4420		03	00

MESSAGE CONFIRMATION

OCT-19-'92 MON 15:00

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-932-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
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MESSAGE CONFIRMATION

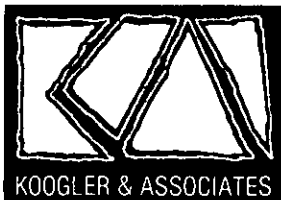
OCT-19-'92 MON 15:03

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-932-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
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File Copy



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
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GAINESVILLE, FLORIDA 32609
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QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL
PACKAGE
TRACKING NUMBER

2226676782

2069M

2226676782

RECIPIENT'S COPY

From (Your Name) Please Print <i>Radcoy Laval</i>		Your Phone Number (Very Important) <i>704-377-5827</i>		To (Recipient's Name) Please Print <i>Brigitte Mitchell</i>		Recipient's Phone Number (Very Important)			
Company <i>ROBBLER & ASSOC</i>		Department/Floor No		Company <i>FEDEX</i>		Department/Floor No			
Street Address <i>4 NW 13TH ST</i>				Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes) <i>2400 Blair Stone Rd</i>					
City <i>INSVILLE</i>		State <i>FL</i>		City <i>Tallahassee FL</i>		State <i>FL</i>			
ZIP Required <i>32609</i>		ZIP Required <i>32391</i>		YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.) <i>521-92-04</i>					
PAYMENT 1 <input type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct No 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct No 4 <input type="checkbox"/> Bill Credit Card 5 <input type="checkbox"/> Cash/Check				IF HOLD FOR PICK-UP, Print FEDEX Address Here Street Address City State ZIP Required					
4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES WEIGHT In Pounds Only		YOUR DECLARED VALUE			
Priority Overnight (Delivers by next business morning) 11 <input type="checkbox"/> YOUR PACKAGING 16 <input type="checkbox"/> FEDEX LETTER 12 <input type="checkbox"/> FEDEX PAK 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE		Standard Overnight (Delivers by next business afternoon) 51 <input type="checkbox"/> YOUR PACKAGING 56 <input type="checkbox"/> FEDEX LETTER 52 <input type="checkbox"/> FEDEX PAK 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE		1 <input type="checkbox"/> HOLD FOR PICK-UP (Fill in Box #) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> 6 <input type="checkbox"/> DRY ICE _____ Lbs 7 <input type="checkbox"/> OTHER SPECIAL SERVICE _____ 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		Total Total Total DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> _____ lbs 3 x <i>W</i> x <i>H</i> =		Emp No Date Federal Express Use <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg To Del <input type="checkbox"/> Chg To Hold Street Address City State Zip Received By <input checked="" type="checkbox"/> Date/Time Received FedEx Employee Number Base Charges Declared Value Charge Other 1 Other 2 Total Charges	
Economy Two-Day (Delivers by second business day) 30 <input type="checkbox"/> ECONOMY		Government Overnight (Restricted to authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE		Freight Service (for Extra Large or any package over 150 lbs) 70 <input type="checkbox"/> OVERNIGHT FREIGHT 80 <input type="checkbox"/> TWO-DAY FREIGHT		REVISION DATE 6/91 PART 413/204 FXEM 2/92 FORMAT #059 099 © 1990-91 FEDEX PRINTED IN U.S.A.			

Mr. Bruce Mitchell
Florida Department of
Environmental Regulation

October 16, 1992
Page 2

NOx CEM Cost	=	\$150,000
Flowmeter Cost	=	\$ 40,000
Annual Calibration and Certification Costs	=	<u>\$ 20,000</u>
TOTAL COST (1)	=	\$210,000

(1) This total does not include annual repair and maintenance related costs, which are difficult to predict.

In comparison, the costs associated with a 30-day compliance test using EPA Method 7E is about \$10,000.

In addition to the high cost, as a reason for not requiring a NOx CEM, please note that a NOx CEM is not required by the federal regulations in 40CFR60, Subpart F or the state of Florida regulations under Florida Administrative Code Rule 17-2.600(7), applicable to cement kilns.

If additional information is required by FDER to support the NOx emission limit and compliance test procedure proposed above, please do not hesitate to give me a call.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:PAR:wa

c: Mr. Don Kelly, FM&M
Mr. Amarjit S. Gill, Southdown
Ms. Anetha Lue, Southdown

Jewell Hanger / Quiss Worley, EPA } FAX'd 10/19/92 BRL
Brian Mitchell, NPS }
Ruthy Liles, HCBCC }
Bill Thomas, SWD mailed 10/19/92 BRL





KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158

KA 521-92-04

October 13, 1992

RECEIVED

OCT 14 1992

Division of Air
Resources Management

Mr. Clair Fancy
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Southdown, Inc. (dba Florida Mining & Materials)
Proposed Permit Modification No. 2 Kiln
AC27-212252, PSD-FL-188

Dear Mr. Fancy:

Southdown has received the Technical Evaluation and Preliminary Determination and proposed permit modification for No. 2 cement kiln at the FM&M facility located in Brooksville, Florida.

Upon reviewing the proposed permit and technical evaluation a few items, for which changes are needed or requested, were identified. These items are noted below.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

1. Section I.C.

Southdown would like to clarify that the actual feed rate to the kiln is 130 tons/hr, based on a measured preheater feed rate of 145 tons/hr.

2. Section I.C.

The kiln heat input rate, stated as "300,000 MMBTU/hr", should be corrected to "300 MMBTU/hr".

3. Section I.C. - Paragraph 3

The kiln oxygen analyzer, stated as being located in the kiln exhaust, is actually located at the kiln feed inlet. The oxygen analyzer is calibrated but it is not a certified oxygen monitor. Records of the instrument calibration will be maintained and logs of the oxygen concentration data will be maintained as required by the existing and proposed permits for this source. It is assumed that FDER was referring to the system presently in place and that a new analyzer is not being required by the permit. Use of the existing oxygen analyzer would be accurately reflected by modifying the phrase "in the stack" to "in the kiln inlet." It should be noted that the combustion gases from the process leave the kiln at the kiln inlet.

4. Section II - Paragraph 8A

The oxygen analyzer is incorrectly referred to as a CEM (see Item 3). Please modify the paragraph to read:

"The kiln exhaust gas oxygen analyzer located at the kiln inlet shall be calibrated, operated"

5. Section III - Paragraph 5

The cost of installing and maintaining a NOx CEM on a year-round basis does not seem to be justified. It is requested that FDER allow demonstration of compliance with the NOx emission limit by the use of a NOx analyzer to determine the NOx emissions based on a 30-day average. This would allow FDER to ensure that the kiln operation is in compliance with the permit limit while avoiding the expenditure of purchasing a NOx CEM system for the kiln. Thus, it is requested that this paragraph be modified as follows:

"... For compliance verification purposes, a 30-day test for NOx emissions shall be conducted within 30 days of the issuance of this permit and annually thereafter. Testing shall be in accordance with the requirements of the permit."

PERMIT NO. AC27-212252, PSD-FL-188

6. Specific Condition No. 3

The basis for the kiln maximum fuel input rate is listed in this condition. It is preferred that this basis ("24,000 lbs/hr of coal with a heating value of 12,500 BTU/lb") be deleted from this permit condition. This would serve to prevent confusion in the future, since these numbers may be mistakenly applied as additional permit limits on the kiln heat input.

7. Specific Condition No. 5

The tons per year of allowable SO₂ emissions were stated as 47.0 tons/year SO₂ in the existing permit instead of 47.15 tons/year. A correction of this error in the proposed permit at this time seems appropriate.

8. Specific Condition No. 6

It is requested that the permit limit for NO_x of 250.0 lbs/hr be based on a 30-day average and that the averaging period be stated in Specific Condition No. 6.

9. Specific Condition No. 6

It is requested that EPA Method 7E be required, in place of Method 7, to allow the use of a continuous NO_x analyzer for compliance testing. Method 7E is capable of more reliable results than Method 7. We are also requesting that a 30-day average of the NO_x CEM data be used for the annual compliance test provided that the CEM calibration and maintenance during the 30-day period meet the applicable standards of 40CFR60.

10. Specific Condition No. 6

It is requested that EPA Method 6C be required, in place of Method 6, for annual SO₂ compliance testing.



11. Specific Condition No. 10

This condition refers to a CEM for oxygen and NOx concentration determination. A modification of this section is requested to reflect the present monitoring system. The following language is suggested:

"Emissions of NOx will be minimized through proper operation practices. A continuous kiln exhaust gas oxygen monitor and data recorder shall be operated, calibrated and maintained. Data for the recorder shall be kept for the most recent two year period and made available upon request."

12. Specific Condition No. 11(d)

A deletion of the minimum moisture content required to the coal storage pile is requested. The "8 percent" moisture, referred to in this condition, is based on the moisture content of the delivered coal rather than the stored coal. If an 8% surface moisture content were to be maintained, the facility would be required to add quantities of moisture to the coal which would lead to operational problems such as handling and low coal heating values. This issue has previously been discussed with FDER on the existing permit for Kiln No. 2 and the following changes were agreed to with FDER:

"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 shall be aligned with the predominant wind direction to minimize wind erosion."

13. Specific Condition 11(c)

For the reasons stated above, condition 11(c), which requires the storage of all materials with less than 14% moisture to be "stored below natural grade in silos or enclosed structures;" is requested to be modified as follows:

"All non-covered raw materials storage areas shall be maintained so as to minimize particulate matter fugitive emissions."

14. Specific Condition No. 11(f)

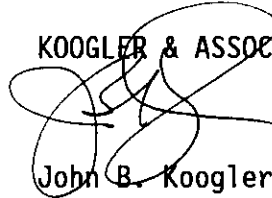
Condition 11(f) refers to a "pneumatic conveying system" for loading cement products to transport trucks. A pneumatic conveying system has never been used at this facility for truck loading. The cement is released into the truck by gravity feed through a loading spout at the base of the storage units. Emissions from the unloading operation are controlled by use of a baghouse (Permit No. A027-194633). Therefore, please modify this condition as follows:

"All cement products shall be transferred to transport trucks through a loading spout."

Please note that the requested amendments will not reduce the operational requirements for compliance with the proposed permit emission limits.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:PAR:wa

c: Mr. Don Kelly, FM&M
Mr. Amarjit S. Gill, Southdown
Ms. Anetha Lue, Southdown
B. Mitchell
B. Shomen, SW Dist
C. Retrick, HC
J. Harper, EPA
B. Mitchell, UPS

