



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
75 Spring Street, S.W.  
Atlanta, Georgia  
30303

August 18, 1992

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AUG 20 1992

Division of Air  
Resources Management

Mr. C. 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

Dear Mr. Fancy:

We have completed our review of the additional material that you sent us regarding a proposal by Southdown, Inc., to modify their existing Prevention of Significant Deterioration permit.

We are pleased that the State has responded to our completeness comments by sending us the additional information. Pursuant to our review of the additional material and telephone conversations between the State staff and my staff in the Air Quality Branch, we are satisfied that the Southdown, Inc., application is complete.

We look forward to reviewing the State's preliminary determination and the Southdown, Inc., permit application during the public comment period. If you have any further questions regarding this matter, please contact Bud Rolofson of our Air Quality Branch in Denver at 303/696-2071.

Sincerely yours,

James W. Pulliam, Jr.  
Regional Director

cc:

Jewell Harper, Chief  
Air Enforcement Branch  
Air, Pesticides and Toxic Management Division  
U.S. EPA, Region 4  
345 Courtland Street, NE.  
Atlanta, Georgia 30365

Cleve Holladay  
B. Mitchell  
C. Hetrick, HCBEC  
B. Thomas, SWD

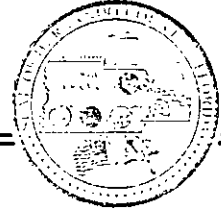
} 4-25-92 RAR

# Board of County Commissioners

Hernando County

PLANNING DEPARTMENT

Government Center / Administration Building  
20 North Main Street, Room 262  
Brooksville, Florida 34601-2807



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AUG 06 1992

Planning - (904) 754-4057  
Fax - (904) 754-4420

Division of Air  
Resources Management

July 30, 1992

Mr. Cleve Halliday  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

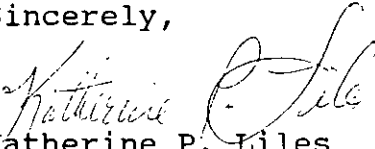
Dear Mr. Halliday:

RE: Permit Modification Request for Kiln No. 2, Southdown, Inc.,  
dba Florida Mining and Materials, Permit File No. AC27-212252  
and PSD-FL-188

In review of the materials provided as a result of DER's May 22, 1992 letter of incompleteness by Koogler and Associates, County staff noted that the NO2 emission source inventory used in the air dispersion modeling was provided by your office. The County would appreciate receiving a copy of the inventory for our records.

Your assistance in providing this information is greatly appreciated.

Sincerely,

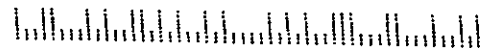
  
Katherine P. Liles  
Environmental Planner

KPL/mfs

*Board of County Commissioners*

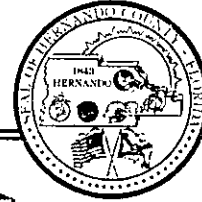
PLANNING DEPARTMENT  
Government Center / Administration Building  
20 North Main Street, Room 262  
Brooksville, Florida 34601

Mr. Cleve Halliday  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400



# Board of County Commissioners

Hernando County



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JUL 27 1992  
Division of Air  
Resources Management  
JUL 21, 1992

2040 Main Street, Room 460  
Brooksville, FL 34601  
(904) 754-4000  
FAX (904) 754-4477

Mr. C.H. Fancy  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Mr. Fancy:

RE: Completeness Letter on FM&M's Request for a Modification to No. 2 Kiln: AC27-212252 and PSD-FL-188

Hernando County staff received word from Mr. Bruce Mitchell of your office that the above mentioned permit modification is anticipated to be deemed complete by July 24, 1992. However, in a review of our file, one condition of the incompleteness letter of May 22 is that the applicant address the comments contained in letters from Hernando County and the National Park Service. The County has not received any of the materials submitted by Florida Mining and Materials (FMM) in response to DER's letter of incompleteness.

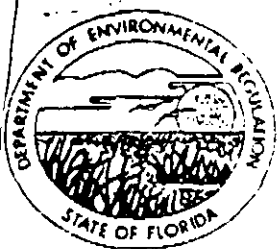
The County's unanswered questions may be raised once again upon issuance of a Notice of Intent; however, answers to our questions are preferred prior to that point to avoid initiation of any formal legal mechanism within the permitting process. If your office has received a full response to the May 22 incompleteness letter, please forward or FAX (904/754-4420) a copy of the package to us to allow our staff to evaluate the response.

As the County previously indicated, a meeting attended by DER representatives may be necessary to resolve any remaining questions. If a meeting is required to resolve outstanding issues, it will be requested by the County once the Notice of Intent is published.

Very truly yours,

CHARLES B. HETRICK  
County Administrator

cc: Bruce Mitchell, DER, Tallahassee  
Tony Cleveland, OHFC  
Lawrence Jennings  
Katherine Liles



# Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

## FACSIMILE TRANSMISSION SHEET

7-24-92

Date

TO: Bruce Mitchell

Dept.: BAR

Phone: \_\_\_\_\_

FROM: Gary Maier

Dept.: DER, Southwest District

Phone: (813) 620-6100 SunCom 542-6100

EXT. 408

OPERATOR: G.M. EXT. \_\_\_\_\_

SUBJECT: FM & M No. 2 Kiln (Day 30 = 7-24-92)

Total Number of Pages, Including Cover Page: 1

Bruce

Harry Kerns asked me to contact you regarding your processing of an application from Florida Mining, (No. 2 kiln). I have no comments for you. I do not think anyone else in the S.W. District has comments at this time either. Thank you for checking with us.

Air Program FAX Number is (813) 620-6092

SunCom 542-6092

Gary Maier

Bruce Mitchell

BAR, FDER

7/24/92

Subj.: Southdown Inc  
No 2 kiln NO<sub>x</sub> modification

This is a follow up to conversation today with Cleve on the availability of low-NO<sub>x</sub> burners for a 300,000 BTU/hr cement kiln using coal/oil:

Name & Co.	Tel #	Availability of Low-NO <sub>x</sub> Burner
Gary Morely, Polysius (kiln mfr.)	404 955 3660	NO
Frank Binkiewicz, Babcock & Wilcox	813 576 6770	NO (only boilers) none for kilns
Roy Fraunhofer, Peabody Specialty Systems	203 327 7000	NO (none for kilns)
Dean Pickett, ABB Construction Engrs	404 394 2616	NO (none for kilns)

Awaiting response from other "phone message" later next week but doesn't seem like anybody has one. Will keep you informed. Take care, *BR*



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**  
4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

FAX TRANSMITTAL FORM

TO: BRUCE MITCHELL  
BAR / DARM

FROM: PRABEER RAVAL

PROJECT: 521-92-04

SENT BY: R

DATE: 7/24/92

FAX PHONE: 904-377-7158

The text being transmitted consists of 1 page/  
PLUS this one.

REMARKS: HOPE THIS HELPS.  
R





State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

# Interoffice Memorandum

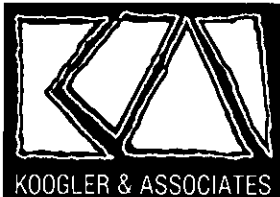
TO: Main File: FM&M/Southdown  
AC 27-212252 and PSD-FL-188  
No. 2 Kiln NOx modification

FROM: Bruce Mitchell *BM*

DATE: July 20, 1992

SUBJ: Notification of the 30-day completeness review clock on  
the compny's last submittal to the Department

This afternoon I called for Mrs. Kathy Liles, who works with the Hernando County's Planning Office. I was only able to speak with a co-worker of Kathy's because Kathy was attending a meeting. However, I was assured that Kathy would get my message, which is that the 30-day completeness review clock for the last submittal to the Department to the above referenced permitting activity would be concluding on July 24, 1992.



KOOGLER & ASSOCIATES  
ENVIRONMENTAL SERVICES  
4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
904/377-5822 • FAX 377-7158

KA 521-92-04

June 23, 1992

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JUN 24 1992

Bureau of  
Air Regulation

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

Subject: Permit Modification Request for Kiln No. 2  
Southdown, Inc. dba Florida Mining & Materials  
Permit File No. AC27-212252 and PSD-FL-188

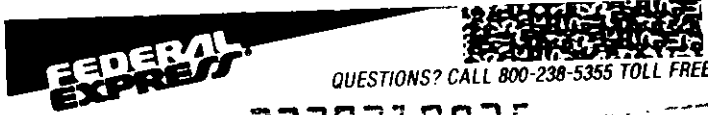
Dear Mr. Fancy:

This is in response to your letter dated May 22, 1992 requesting additional information on the above project. The responses are presented below in the order of the questions raised by FDER.

1. Due to source obligation, the NO<sub>x</sub> emission evaluation has to begin from the previously established "actuals" of 158.4 lbs/hr (@ 7896 hrs/yr; 625/4 tons/yr; AC27-173474-signed July 20, 1990) instead of the previous allowables of 162.3 lbs/hr. Therefore, please correct and reevaluate the proposal under this direction.

RESPONSE: The revision of the nitrogen oxides (NO<sub>x</sub>) emission evaluation based on an actual NO<sub>x</sub> emission rate of 158.4 pounds per hour, in place of the previous allowable emission rate of 162.3 pounds per hour, affect three analyses presented in the permit modification request. The following analyses have been revised and are discussed below:

- a. NO<sub>x</sub> emissions increase;
- b. Ambient air quality impact analysis; and,
- c. Visibility impairment analysis.



QUESTIONS? CALL 800-238-5355 TOLL FREE

AIRBILL  
PACKAGE  
TRACKING NUMBER 2229319035

69M  
2229319035

RECIPIENT'S COPY

From (Your Name) Please Print <i>John Kogler</i>		Your Phone Number (Very Important) <i>705-377-8222</i>		To (Recipient's Name) Please Print <i>Mr. Clair Fancy</i>		Recipient's Phone Number (Very Important)			
Company <i>KOGLER &amp; ASSOC</i>		Department/Floor No		Company <i>FL Dept. of Env. Reg.</i>		Department/Floor No			
Street Address <i>4014 NW 13TH ST</i>		City <i>GAINSVILLE</i>		City <i>Tallahassee FL</i>		State <i>FL</i>			
State <i>FL</i>		ZIP Required <i>32609</i>		State <i>FL</i>		ZIP Required <i>32399</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				IF HOLD FOR PICK-UP, Print FEDEX Address Here					
5 <input type="checkbox"/> Cash <input type="checkbox"/> Check				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 Ounces			
Priority Overnight (Delivery 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 Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY Standard Overnight (Delivery 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 Government Overnight (Restricted to authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE Freight Service (For Extra Charge on any package over 150 lbs) 70 <input type="checkbox"/> OVERNIGHT FREIGHT 80 <input type="checkbox"/> TWO-DAY FREIGHT <small>(Confirmed reservation required)</small> <small>† Delivery commitment may be later in some areas</small>		1 <input type="checkbox"/> HOLD FOR PICK-UP (If in Box H) 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 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"/> DELIVERY 12 <input type="checkbox"/> HOLIDAY DELIVERY (If observed) (Extra charge)		Total Total Total DIM SHIPMENT (Chargeable Weight) lbs. 1 <input type="checkbox"/> Regular Stop 2 <input type="checkbox"/> On-Call Stop 3 <input type="checkbox"/> Signature 4 <input type="checkbox"/> BSC 5 <input type="checkbox"/> Station 6 <input type="checkbox"/> Drop Box		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 X Date/Time Received FedEx Employee Number Release Signature FedEx Emp No Date/Time		Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 6/91 PART #137204 FEDEX 2/92 FORMAT #099 <b>099</b> © 1990-91 FEDEX PRINTED IN U.S.A.	

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JUN 24 1992

BANK

### Nitrogen Oxides Emission Increase

The revised net NOx emission increases from the proposed project are:

$$\begin{aligned}\text{Hourly NOx increase} &= (250.0 - 158.4) \text{ lbs/hr} \\ &= 91.6 \text{ lbs/hr}\end{aligned}$$

$$\begin{aligned}\text{Annual NOx increase} &= (1025.0 - 625.4) \text{ tons per year} \\ &= 399.6 \text{ tpy}\end{aligned}$$

While the revised emission increases are slightly higher than the 87.7 pounds per hour and 359.6 tons per year presented in the application, it should be noted that the PSD rule applicability will remain unchanged.

### Ambient Air Quality Impact Analysis

Air dispersion modeling was conducted using the EPA approved ISC-ST2 model with the revised "actual" NOx emission rate of 158.4 pounds per hour. The Class I area PSD increment analysis included the nitrogen dioxide emission source inventory provided by Mr. Cleve Holladay of FDER.

The Class II area modeling results summarized in Table 1 show that the maximum predicted ambient air quality impacts from the proposed project are less than significant, as defined by FAC Rule 17-2.100, and also below the FDER No-Threat-Levels.

The Class I area modeling results summarized in Table 2 show that the maximum predicted cumulative PSD increment consumption (including the proposed project) is 0.32  $\mu\text{g}/\text{m}^3$ , or about 13 percent of the allowable Class I area nitrogen dioxide increment.

The computer modeling output is presented in the Appendix. A diskette is also enclosed.

### Visibility Analysis

The VISCREEN analysis, conducted in accordance with the EPA modeling guidelines, was revised based on the approach recommended by FDER and the National Park Service. The visibility impact of the proposed NOx increase was further compared with the visibility impact of the total emissions from Kiln No. 2.

As the proposed project had exceeded the Level 1 visibility screening test criteria, a Level 2 visibility analysis was performed. The results presented in Table 3 show that the requested increase in the allowable NOx emissions is not expected to result in adverse visibility impacts in the Class I area.



The computer output is presented in the Appendix.

2. Please redo the NO<sub>2</sub> PSD Class I cumulative increment modeling using the corrected input value referenced in Comment #1 above and all of the increment consuming sources previously identified.

RESPONSE: See Response 1.

3. The proposed project fails a Level 1 visibility screening test using the recommended default values in the VISCREEN model. Therefore, please perform a Level 2 visibility screening analysis (and, if necessary, a Level 3) for the project.

RESPONSE: See Response 1.

4. Please address the comments contained in the attached letters (i.e., Hernando County and National Park Service). Where the comment(s) is/are duplicated, please refer to a previous answer.

Hernando County Board of County Commissioners Questions:

- A. Describe the history of NO<sub>x</sub> emissions from Kiln No. 2 including any changes in permitted emission rates, the reasons for those changes, and any violations of emission levels.

RESPONSE: The requested information is presented in Attachment 1.

- B. Provide the history of NO<sub>x</sub> emissions related to Kiln No. 1 and describe any restrictions of NO<sub>x</sub> emissions from said kiln.

RESPONSE: A history of NO<sub>x</sub> emissions for Kiln No. 1 is not available since annual NO<sub>x</sub> emission testing is not required by the air permit for Kiln No. 1. A single NO<sub>x</sub> emission determination for Kiln No. 1 was performed on February 28, 1992 in keeping with permit requirements for this unit. This information was submitted to FDER and showed an average of 321.8 pounds per hour of NO<sub>x</sub> at a 130 tons per hour kiln feed rate.



- C. Provide a summary of the results of oxygen levels taken from the continuous exhaust gas oxygen monitor. Identify the point at which the oxygen levels would be representative of excess air in the kiln.

RESPONSE: Excess oxygen levels representative of typical unit operation are submitted to the FDER as part of the annual air compliance test for Kiln No. 2. The information submitted to FDER for the March 24, 1992 compliance test indicates average excess oxygen levels of 0.922 percent at a raw material feed rate of 140.88 tons per hour to the preheater. The excess oxygen is determined by a probe located at the feed inlet to the kiln. The excess oxygen at this point represents excess combustion air supplied to the kiln.

Response 1 addresses the National Park Service comments on the proposed project.

If you have questions, please do not hesitate to give me call.

Very truly yours,

KOGLER & ASSOCIATES

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

JBK:wa  
Enc.

- c: Mr. D. Kelly, Southdown  
Ms. A. Lue, Southdown  
Mr. A. Gill, Southdown  
Mr. B. Thomas, FDER, Tampa  
Ms. C. Shaver, NPS  
Ms. J. Harper, EPA  
Mr. C. Hetrick, HCBC  
Mr. G. Smallridge, FDER, OGC  
*B. Mitchell*  
*C. Halladay*



TABLE 1  
SUMMARY OF NITROGEN OXIDES IMPACT ANALYSIS  
SOUTHDOWN, INC.  
HERNANDO COUNTY, FLORIDA

METEOROLOGICAL DATA	CLASS II AREA NITROGEN OXIDES IMPACT ( $\mu\text{g}/\text{m}^3$ )*		
	ANNUAL	8-HOUR	24-HOUR
1982	0.53	11.77	5.26
1983	0.36	10.48	6.18
1984	0.46	16.43	5.37
1985	0.46	12.79	8.90
1986	0.49	11.45	5.14
Significant Impact 17-2.100, FAC	1.0	NA	NA
De minimis Impact 17-2.500(3)(e)1, FAC	14	NA	NA
Ambient Standard 17-2.300(3)(e), FAC	100	NA	NA
PSD Increment, Class II 17-2.310, FAC	25	NA	NA
FDER No-Threat Levels (Permitting Guidelines)	NA	60.0	14.4

\* The maximum predicted impacts are based on the increase in NOx emissions from Kiln No. 2 of 91.6 lbs/hr (11.55 g/s).



TABLE 2  
SUMMARY OF NITROGEN OXIDES CLASS I AREA INCREMENT CONSUMPTION

SOUTHDOWN, INC.  
HERNANDO COUNTY, FLORIDA

METEOROLOGICAL DATA	CUMULATIVE NITROGEN DIOXIDE INCREMENT CONSUMPTION ( $\mu\text{g}/\text{m}^3$ ) ANNUAL
1982	0.32
1983	0.28
1984	0.29
1985	0.29
1986	0.30
Class I PSD Increment 17-2.310, FAC	2.5





TABLE 3  
VISIBILITY ANALYSIS RESULTS

SOUTHDOWN, INC.  
HERNANDO COUNTY, FLORIDA

Asterisks (\*) indicate plume impacts that exceed screening criteria

Maximum Visual Impacts INSIDE Class I Area  
Screening Criteria ARE NOT Exceeded

Backgrnd	Theta	Azi	Distance	Alpha	Delta E		Contrast	
					Crit	Plume	Crit	Plume
SKY	10.	115.	18.1	54.	2.00	.714	.05	-.002
SKY	140.	115.	18.1	54.	2.00	.232	.05	-.002
TERRAIN	10.	84.	16.1	84.	2.00	.209	.05	.001
TERRAIN	140.	84.	16.1	84.	2.00	.068	.05	.001

Maximum Visual Impacts OUTSIDE Class I Area  
Screening Criteria ARE NOT Exceeded

Backgrnd	Theta	Azi	Distance	Alpha	Delta E		Contrast	
					Crit	Plume	Crit	Plume
SKY	10.	25.	11.5	144.	2.00	.836	.05	-.003
SKY	140.	25.	11.5	144.	2.00	.272	.05	-.003
TERRAIN	10.	5.	5.0	164.	2.00	.383	.05	.002
TERRAIN	140.	5.	5.0	164.	2.00	.126	.05	.002

NOTE: The above analysis is based on the increase in NOx emissions from Kiln No. 2 of 91.6 lbs/hr (11.55 g/s).



ATTACHMENT 1  
NITROGEN OXIDES EMISSION HISTORY



SOUTHDOWN, INC.

BROOKSVILLE PLANT  
Kiln No. 2

Permitted Emissions for NOx

Date	NOx Permitting Activity	NOx Limit	Kiln Feed Rate	Kiln Operating Hours
May 12, 1980	Application for Permit to Construct Kiln No. 2 and Associated Equipment	195.3 lb/hr 771.0 tn/yr	120 tn/hr	8,760
July 25, 1981	Construction Permit No. AC27-30450 •PSD-FL-063 (PSD Review)	195.3 lb/hr 771.0 tn/yr	120 tn/hr	7,896
August 29, 1983	Operating Permit No. AC27-65207	195.3 lb/hr 771.0 tn/yr	120 tn/hr	7,896
August 28, 1987	Application for Construction Permit •To increase NOx Limits	330.0 lb/hr 1247.4 tn/yr	120 tn/hr	7,896
November 3, 1988	Construction Permit AC27-138850 •PSD-FL-124 (PSD Review) •BACT determined for NOx •PSD Compliance for NOx was established	250.0 lb/hr 987.0 tn/yr	120 tn/hr	7,896
December 1, 1989	Application to amend Permit AC27-138850 •To increase operating hours	244.0 lb/hr 1025.0 tn/yr	130 tn/hr	8,400
March 21, 1990	Addendum to Application to Amend Permit No. AC27-138850	247.0 lb/hr	130 tn/hr	8,200
July 25, 1990	Construction Permit No. AC27-173474	162.3 lb/hr 665.3 tn/yr	130 tn/hr	8,200
May 9, 1991	Operating Permit No. AC27-194660	162.3 lb/hr 665.3 tn/yr	130 tn/hr	8,200

SOUTHDOWN, INC.

BROOKSVILLE PLANT  
Kiln No. 2

Discussion of Permitted NOx Emissions

Date	NOx Permitting Activity	NOx Limit	Kiln Feed Rate	Kiln Operating Hours
May 12, 1980	Application for Permit to Construct Kiln No. 2 and Associated Equipment	195.3 lb/hr 771.0 tn/yr	120 tn/hr	8,760
July 25, 1981	Construction Permit No. AC27-30450 •PSD-FL-063 (PSD Review)	195.3 lb/hr 771.0 tn/yr	120 tn/hr	7,896
August 29, 1983	Operating Permit No. AC27-65207	195.3 lb/hr 771.0 tn/yr	120 tn/hr	7,896
<ul style="list-style-type: none"> <li>• In 1984 and 1985, compliance testing showed NOx emission rates below the permitted levels of 195.3 lb/hr.</li> <li>• In April and May 1986, compliance testing demonstrated NOx emission rates of 403 lb/hr and 244 lb/hr. This exceedence was due primarily to the high ammonia concentration in the fly ash from Tampa Electric. To verify this, all fly ash containing ammonia was flushed from the kiln system. The kiln system was then retested in August 1986. The resulting NOx emissions were considerably below the 195.3 lb/hr limit.</li> <li>• In November 1986, FDER and FMM met to discuss the matter. FMM agreed to submit an application to increase the NOx emission limits, and to comply with the current NOx emission limit by limiting the amount of the particular fly ash until permit approval is obtained. As a result of the meeting, this issue was resolved and a Consent Order was issued.</li> <li>• <b>January 12, 1987 -- FDER Issued Consent Order No. 06C-86-1471 for NOx exceedence during compliance testing in April and May 1986. FMM paid a \$13,560 fine in settlement.</b></li> </ul>				
<p><b>NOTE: Southdown, Inc. acquired the Brooksville plant on April 7, 1988.</b></p>				

Date	NOx Permitting Activity	NOx Limit	Kiln Feed Rate	Kiln Operating Hours
August 28, 1987	Application for Construction Permit •To increase NOx Limits	330.0 lb/hr 1247.4 tn/yr	120 tn/hr	7,896
November 3, 1988	Construction Permit AC27-138850 •PSD-FL-124 (PSD Review) •BACT determined for NOx •PSD Compliance for NOx was established	250.0 lb/hr 987.0 tn/yr	120 tn/hr	7,896
<ul style="list-style-type: none"> <li>• In August 1987, FMM submitted an application to increase the NOx from 195.3 lb/hr to 330 lb/hr (an emission level of 330 lb/hr allows 195.3 lb/hr due to combustion of NOx and 134.7 lb/hr due to fly ash contribution). The proposed increase was not a result of a higher production rate or change in operations.</li> <li>• BACT analysis for NOx was submitted with the permit application (see Attachment 1).</li> <li>• BACT determination was issued by FDER on November 3, 1988 (see Attachment 2).</li> <li>• Actual emissions of NOx will be minimized through the use of low excess air firing. A continuous kiln exhaust gas oxygen monitor shall be installed, calibrated, operated and maintained in proper working order.</li> </ul>				

Date	NOx Permitting Activity	NOx Limit	Kiln Feed Rate	Kiln Operating Hours
December 1, 1989	Application to amend Permit AC27-138850 •To increase operating hours	244.0 lb/hr 1025.0 tn/yr	130 tn/hr	8,400
March 21, 1990	Addendum to Application to Amend Permit No. AC27-138850	247.0 lb/hr	130 tn/hr	8,200
July 25, 1990	Construction Permit No. AC27-173474	162.3 lb/hr 665.3 tn/yr	130 tn/hr	8,200
May 9, 1991	Operating Permit No. AC27-194660	162.3 lb/hr 665.3 tn/yr	130 tn/hr	8,200
<ul style="list-style-type: none"> <li>• On October 20, 1989, FMM met with FDER and advised that the plant was having difficulty in complying with the stringent air permit limitations.</li> <li>• FDER indicated that the plant could increase the permitted hours of operation without triggering PSD if it could show a lower pounds per hour of emissions.</li> <li>• FMM provided test data showing low NOx levels which became FMM permit limitations.</li> <li>• By letter dated January 10, 1990, EPA, Region IV, advised that the netting calculations performed by applicant were incorrect. EPA alleged that FMM used permitted allowable emissions as actual emissions rather than using existing emissions based on the previous two years of operating data.</li> <li>• FMM submitted an Addendum to its Application in response to EPA comments and accepted the emission calculations in the manner suggested, in an effort to avoid delay in the permitting process. FMM revised the annual hours of operation from 8,400 hours to 8,200 hours/year as requested.</li> <li>• FMM advised that the new proposed limits on NOx of 162.3 lb/hr are severely restrictive and difficult to achieve. FMM advised that the 250.0 lb/hr limit will be pursued with EPA, Region IV.</li> <li>• EPA's Final Determination indicated that EPA's policy on netting calculations will not allow an increase in the proposed limit. To obtain a higher limit, the application would have to be refiled under the PSD rule.</li> <li>• On July 25, 1990, FDER issued a construction permit and, based upon the highest two 1989 stack test results, concluded that the new allowable NOx limit should be 162.3 lb/hr.</li> <li>• Permit issuance resulted in a 25% reduction in the NOx limit for a 3% increase in operating hours.</li> <li>• In 1991, FMM demonstrated compliance with the NOx emission limit of 162 lb/hr with a 110 lb/hr emission rate. The permit limit of 162 lb/hr represents 2 lb/tn of clinker. This may be the lowest NOx limit for a cement kiln in the country.</li> </ul>				

ATTACHMENT 1

Included with FM&M  
Submittal dated April 20, 1988,  
submitting additional information  
to be included with  
Permit Application dated  
August 28, 1987.

BACT Analysis For NOx

A summary of NOx emission factors and the associated pollution control systems for Portland Cement Plants are enclosed for permitted Florida facilities and nationwide facilities. This data shows that the NOx emission factors range from 2.50 lbs of NOx per ton of clinker to 7.98 lbs. of NOx per ton of clinker. The proposed FM&M emission rate of 320 lbs. per hour is the lowest emission rate for Florida facilities. The proposed FM&M emission factor of 4.65 lbs. of NOx per ton of clinker is in the mid range of values on a nationwide basis.

An important consideration is that the original NOx emission rate of 195 lbs per hour is the lowest in the nation and the resulting emission factor of 2.75 lbs. of NOx per ton of clinker is one of the lowest in the nation. Actual testing of the FM&M facility prior to the addition of ammonia to the flyash shows emission rates between 11.9 to 141.2 lbs. per hour. Unfortunately, the addition of ammonia to the fly ash results in a substantial increase in NOx emissions. These emissions are not directly controlled by combustion refinement but are more a product of high kiln temperatures and the ammonia source of nitrogen.

The alternatives to using ammonia fly ash in the kiln are (1) disposing of the fly ash in a landfill or other containment area (2) the elimination of ammonia from the flyash. The placing of ammonia contaminated flyash in a landfill provides for potential serious groundwater contamination. The elimination of ammonia from the flyash would result in serious H<sub>2</sub>SO<sub>4</sub> mist emissions from Tampa Electric Big Bend 3. The use of this flyash in a cement product provides for the best overall solution with a minimal environmental impact. This is especially true when the ground level impact is considered.

**FDER BACT DETERMINATION**  
Issued by FDER on November 3, 1988  
(November 3, 1988)

**BACT Determined by FDER**

- 12.0 lb/hr                      SO<sub>2</sub>
- 250.0 lb/hr                    NO<sub>x</sub>

- Based on the application's operating schedule of 7,560 hr/yr, the proposed increases (20 lb/hr for SO<sub>2</sub> and 330 lb/hr for NO<sub>x</sub> in hourly emission limitations would result in annual emission increases of 64.3 and 509.2 tn/yr. These annual increases each exceed the 40 tons per year significant emission increase, thus requiring a BACT determination.

**BACT Determination Rationale:**

- Compliance Testing results for a four (4) year period beginning April 1983 indicate that the SO<sub>2</sub> emissions range from a low of 2.4 lb/hr to a high of 11.99 lb/hr with the highest measurement occurring back in April of 1983.
- Based on this finding, it appears that the requested level of 20 lb/hr is much higher than would be expected from the facility. FDER judges that 12.0 lb/hr appears to be more reasonable.
- Compliance Testing results for a four (4) year period referred to above indicate that NO<sub>x</sub> emissions ranged from a low of 111.9 lb/hr to a high of 403 lb/hr. Of the six measurements, the highest reading of 403 lb/hr was well above the other measurements which averaged 159.6 lb/hr.
- Based on the test data, FDER judges BACT to be 250.0 lb/hr. FDER believes the 403.0 reading should not be judged to be representative of the multi-year operation. In addition, FDER states that this NO<sub>x</sub> emission level is quite typical as BACT for other cement kilns of similar size.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

MAY 29 1992

4APT-AEB

RECEIVED

JUN 1 1992

Division of Air  
Resources Management

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)

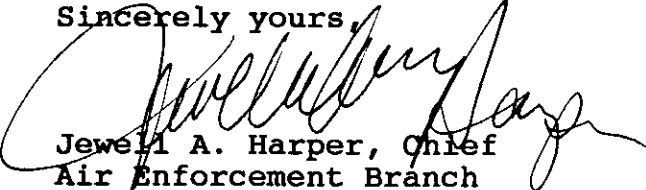
Dear Mr. Fancy:

This is to acknowledge receipt of the Prevention of Significant Deterioration (PSD) permit modification package for the above referenced facility, by your letter dated April 23, 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; presently the kiln is permitted at 162.3 pounds per hour (both on 30-day averages). Southdown proposes to limit NO<sub>x</sub> 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,

  
Jewell A. Harper, Chief  
Air Enforcement Branch  
Air Pesticides, and Toxics  
Management Division

cc: D. Mitchell  
C. Holladay  
B. Thomas, SW Dist  
C. Sharer, NPS  
C. Detrick, HCBCC  
CAF/BR/PL

P 710 058 486



### Certified Mail Receipt

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sender	
Charles Netrick	
Street & No.	
Hernando Cty Board of CC's	
PO, State & 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, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	6-5-92
AC 27-212252	
PSD-FI-188	

PS Form 3800, June 1990

#### SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Charles B. Netrick  
 Hernando Cty Board of CC's  
 20 N main St - Rm 460  
 Brooksville, FL 34601

4a. Article Number  
 P 710 058 486

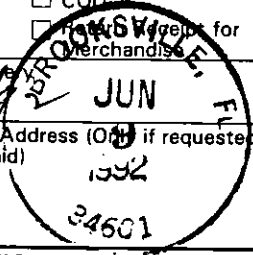
4b. Service Type  
 Registered     Insured  
 Certified     COD  
 Express Mail     Return Receipt for Merchandise

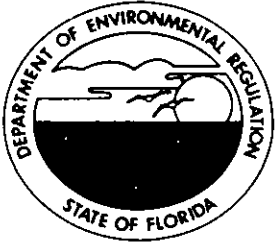
7. Date of Delivery  
 6/9/92 JUN

5. Signature (Addressee)  
 [Signature]

8. Addressee's Address (Only if requested and fee is paid)  
 1592

6. Signature (Agent)  
 [Signature]





# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 2, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Charles B. Hetrick  
County Administrator  
Hernando County Board of County Commissioners  
20 N. Main Street, Room 460  
Brooksville, Florida 34601

Dear Mr. Hetrick:

Re: Completeness Letter on FM&M's Request for a Modification  
No. 2 Kiln: AC 27-212252 and PSD-FL-188

The Department has reviewed your letter, which was received May 22, 1992, regarding the above referenced project currently being evaluated by the Department's Bureau of Air Regulation and Southwest District. As you can see by the enclosure, your letter was attached to the Department's incompleteness letter, that was sent on May 22, 1992, and requires a response on the contents of your letter.

You also raised a point of having an informal meeting prior to the Department issuing its Intent. As was done in April, we feel that informal meetings, as opposed to administrative hearings, is an excellent way to resolve certain issues. However, a meeting seems premature until the Department's Intent is prepared. The Department will issue its Intent after the application is deemed complete, and await your comments to see if there is a need to hold such a meeting.

If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

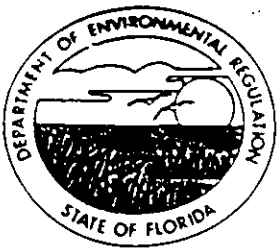
Sincerely,

Howard L. Rhodes, P.E.  
Interim Director  
Division of Air Resources  
Management

HLR/rbm

Enclosure

cc: B. Thomas, SW District  
W. Congdon, Esq., DER  
D. Beason, Esq., DER



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 22, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Kelly, Plant Manager  
Florida Mining & Materials  
Post Office Box 6  
Brooksville, Florida 34605-0006

Dear Mr. Kelly:

Re: Completeness Review for a Modification Request  
Kiln No. 2  
AC 27-212252 and PSD-FL-188

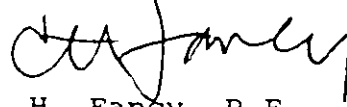
The Department has reviewed the application package and supplementary information received on April 22 and May 5, 1992, respectively. Based on a technical review of the material, the application package is deemed incomplete. Therefore, please submit to the Department's Bureau of Air Regulation the following information, including all calculations, assumptions and reference material, and the status will, again, be ascertained:

1. Due to source obligation, the NO<sub>x</sub> emission evaluation has to begin from the previously established "actuals" of 158.4 lbs/hr (@ 7896 hrs/yr; 625.4 tons/yr; AC 27-173474-signed July 20, 1990) instead of the previous allowables of 162.3 lbs/hr. Therefore, please correct and reevaluate the proposal under this direction.
2. Please redo the NO<sub>2</sub> PSD Class I cumulative increment modeling using the corrected input value referenced in comment # 1 above and all of the increment consuming sources previously identified.
3. The proposed project fails a Level 1 visibility screening test using the recommended default values in the VISCREEN model. Therefore, please perform a Level 2 visibility screening analysis (and, if necessary, a Level 3) for the project.
4. Please address the comments contained in the attached letters (i.e., Hernando County and National Park Service). Where the comment(s) is/are duplicated, please refer to a previous answer.

Mr. Don Kelly  
Page 2

If there are any questions, please call Bruce Mitchell or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,



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

CHF/BM/rbm

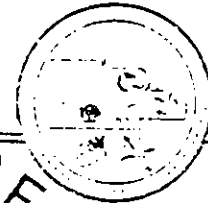
Attachments

cc: B. Thomas, SWD  
J. Koogler, Ph.D., P.E., K&A  
C. Shaver, NPS  
J. Harper, EPA  
C. Hetrick, HCBCC  
G. Smallridge, Esq., DER

Attachments

# Board of County Commissioners

Hernando County



20 N. Main Street, Room 460  
Brooksville, FL 34601

May 13, 1992 (904) 754-4600

FAX (904) 754-4477

RECEIVED  
MAY 18 1992  
Division of Air  
Resources Management

Secretary Carol Browner  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Secretary Browner:

At the request of Mr. Clare Fancy of the Bureau of Air Regulation, Hernando County staff has reviewed the application for Florida Mining and Materials Kiln No. 2 Modification (AC 27212252, PSD-FL-188). Several questions resulted as part of the review, and the need for additional information was identified.

- 1) Describe the history of NOX emissions from kiln #2 including any changes in permitted emission rates, the reasons for those changes, and any violations of emission levels.
- 2) Provide the history of NOX emissions related to kiln #1 and describe any restrictions of NOX emissions from said kiln.
- 3) Provide a summary of the results of oxygen levels taken from the continuous exhaust gas oxygen monitor. Identify the point at which the oxygen levels would be representative of excess air in the kiln.

The Hernando County Board of County Commissioners addressed the modification in a Board meeting on May 12, 1992 and requested that the Department of Environmental Regulation schedule an informal meeting in Hernando County prior to issuance of any Intent in order to discuss the additional information needed. This meeting would also allow for questions raised by residents of the County during the May 12 meeting to be answered. Attendance by members of the Bureau of Air Regulation, the Office of General Counsel, and the Tampa District Office would be beneficial.

Please contact the County to discuss the logistics of establishing this meeting. Your assistance is appreciated.

Sincerely,

Charles B. Hetrick  
County Administrator

cc: Lawrence Jennings, Planning Department Manager  
Tony Cleveland, Oertel, Hoffman, Fernandez and Cole, P.A.  
Clare Fancy, DER, Tallahassee  
Richard Garrity, DER, Tampa

5/17/92

*Brown*  
Do you have  
a copy of this?  
*Preston*

**DRAFT**

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

Dear Mr. Fancy:

We have completed our review of the material that you sent us regarding Southdown Inc.'s proposal to modify their existing Prevention of Significant Deterioration (PSD) permit. Southdown Inc., doing business as Florida Mining and Materials (FMM), operates a portland cement manufacturing facility and is proposing to increase the allowable emission rate of nitrogen oxides (NO<sub>x</sub>) from the existing No. 2 cement kiln from 162.3 to 250.0 pounds per hour, 30-day average. The higher allowable hourly emission rate will result in a significant increase in NO<sub>x</sub> emissions from the No. 2 kiln from 665.4 to 1025.0 tons per year. The facility is located near Brooksville, Florida, approximately 14 km east of the Chassahowitzka Wilderness Area, a Class I air quality area administered by the U.S. Fish and Wildlife Service.

We are pleased that the State required the applicant to submit additional analyses regarding cumulative increment consumption and visibility impacts. However, we do have some concerns regarding these analyses and the completeness of the application.

It should be made clear that the Class I PSD increment is for nitrogen dioxide (NO<sub>2</sub>) and not for NO<sub>x</sub> as referred to in the application and the supplemental analyses. The technique of summing previously modeled maximum impacts from other increment-consuming sources to predict the total NO<sub>2</sub> increment consumption is unconventional and it is not clear that all analyses used the same meteorological data set. If all analyses used the same meteorological data, we are willing to accept the analysis as an initial impact estimate for this application because there are a limited number of NO<sub>x</sub> sources in the area and the total estimated impacts are low (0.19 ug/m<sup>3</sup> annual average).

A visibility analysis was performed by the applicant as a supplemental analysis. The results are characterized as potential impacts from the proposed modification using VISCREEN Level 1 analysis. These results are neither a Level 1 or Level 2 analysis. Any changes to the default meteorological inputs used for the wind speed voids it as a Level 1 screening analysis. As indicated in the Environmental Protection Agency's Workbook for Plume Visual Impact Screening and Analysis (September 1988) "For Level-1 plume visual impact screening, the analyst should use the default input offered in Viscreen." Therefore, we performed an analysis using the screening Level 1 as recommended in the September 1988 workbook.



**DRAFT**

Our results showed that the proposed project fails the Level-1 screening test.

The next step is to perform a Level-2 screening analysis. This involves the use of less conservative assumptions as input to the model. For a Level-2 screening analysis the workbook calls for "the worst-case wind direction and speed and atmospheric stability". It recommends as important input "the joint frequency distribution of these parameters as measured at or near the location of the emission source." The applicant's analysis used a higher wind speed than the Level-1 default value and justified it by stating that it is "a more realistic wind speed." This is not a criteria for input in VISCREEN screening analyses.

The applicant needs to perform a Level-2 (and if necessary a Level-3) analysis for the proposed project according to the specifications in the workbook. Until this is done one cannot conclude that the proposed project will not impair visibility in the Chassahowitzka Wilderness Area.

We appreciate the opportunity to comment on the completeness of FMM's permit application. If you have any further questions regarding this matter, please contact Bud Rolofson of our Air Quality office in Denver at (303) 969-2071.

Sincerely,

James W. Fulliam, Jr.  
Regional Director

cc: Jellell Harper, Chief  
Air Enforcement Branch  
Air, Pesticides and Toxic Management Division  
U.S. EPA, Region 4  
345 Courtland Street, NE  
Atlanta, Georgia 30365

bcc:  
FWS-WASO: Don Veros, Chief, Resource Management  
FWS-REG. 4: AQC  
FWS-REG. 6: Ty Berry  
CHAS: Refuge Manager  
AQD-DEN: Bud Rolofson  
National Park Service - AIR  
P.O. Box 25267  
Denver, CO 80225

Preston



United States Department of the Interior

NATIONAL PARK SERVICE  
AIR QUALITY DIVISION  
P.O. BOX 25287  
DENVER, CO 80225

IN REPLY REFER TO:

DATE: 3/15/92

TIME: 11:30 AM

FAX PHONE NO. FTS 327-2822 or (303) 969-2822

NUMBER OF PAGES TO FOLLOW: 2

TO: Clair Fancy  
FDEP PHONE: 922-8979

FROM: Rud Polheim - FWS  
PHONE: 303-969-2804

SUBJECT: Southdown Completeness Review

REMARKS: We are sending an unsigned draft for  
your use. Signed copy will follow

*S. Smallwood  
Judy Rogers handle*

# Board of County Commissioners

Hernando County



20 N. Main Street, Room 460  
Brooksville, FL 34601

May 13, 1992

(904) 754-4000

FAX (904) 754-4477

Secretary Carol Browner  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Secretary Browner:

At the request of Mr. Clare Fancy of the Bureau of Air Regulation, Hernando County staff has reviewed the application for Florida Mining and Materials Kiln No. 2 Modification (AC 27212252, PSD-FL-188). Several questions resulted as part of the review, and the need for additional information was identified.

- 1) Describe the history of NOX emissions from kiln #2 including any changes in permitted emission rates, the reasons for those changes, and any violations of emission levels.
- 2) Provide the history of NOX emissions related to kiln #1 and describe any restrictions of NOX emissions from said kiln.
- 3) Provide a summary of the results of oxygen levels taken from the continuous exhaust gas oxygen monitor. Identify the point at which the oxygen levels would be representative of excess air in the kiln.

The Hernando County Board of County Commissioners addressed the modification in a Board meeting on May 12, 1992 and requested that the Department of Environmental Regulation schedule an informal meeting in Hernando County prior to issuance of any Intent in order to discuss the additional information needed. This meeting would also allow for questions raised by residents of the County during the May 12 meeting to be answered. Attendance by members of the Bureau of Air Regulation, the Office of General Counsel, and the Tampa District Office would be beneficial.

Please contact the County to discuss the logistics of establishing this meeting. Your assistance is appreciated.

Sincerely,

Charles B. Hetrick  
County Administrator

cc: Lawrence Jennings, Planning Department Manager  
Tony Cleveland, Oertel, Hoffman, Fernandez and Cole, P.A.  
Clare Fancy, DER, Tallahassee  
Richard Garrity, DER, Tampa

RECEIVED

MAY 22 1992

Division of Air  
Resources Management

Department of Environmental Regulation  
**Routing and Transmittal Slip**

To: (Name, Office, Location)

1. ~~Clay~~ AI: DARM 577
2. Due: 6-2-92
3. Preston 5/27
- 4.

Remarks:

Draft response for Howard's  
signature.

pls have Bruce  
draft response

Clay

From:

Judy

Date

5-26

Phone

Department of Environmental Regulation  
*Helvia* Mail Response — Action Slip

Date out: 5.21

Action Item No. 5.050

DATE DUE: 6.4.92

**TO:**

- Mark Latch     Richard Harvey     Dan Thompson     Mike Peyton   
Steve Smallwood     John Ruddell     Mimi Drew     Gil Bergquist   
Dana Minerva     Other \_\_\_\_\_

**RECEIVED**

~~MAY 22 1992~~

**ACTION:**

- Handle     Draft Resp. CMB     Draft for Gov.     Respond, Your Signature   
Other \_\_\_\_\_

Division of Air  
Resources Management

(ITEMS for Secretary's Signature **MUST** be reviewed by Division and Secretary's Staff)  
Draft Reviewed by (Div.) \_\_\_\_\_ Date \_\_\_\_\_    Reviewed by (O.Sec.) \_\_\_\_\_ Date \_\_\_\_\_

Return to Doris Hayes **NO LATER THAN:** 6.4.92

P 710 058 535



**Certified Mail Receipt**

No Insurance Coverage Provided  
Do not use for International Mail  
(See Reverse)

Sent to	
Mr. Don Kelly, Plant Mgr.	
Street & No. FM&M	
P.O. Box 6	
P.O. State & ZIP Code Brooksville, FL 34605-0006	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date mailed: 5/22/92	
AC 27-212252 and PSD-FL-188	

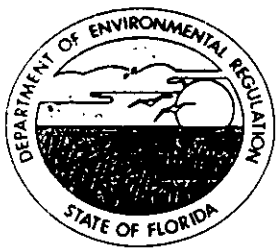
PS Form 3800, June 1990

<b>SENDER:</b> • Complete items 1 and/or 2 for additional services. • Complete items 3, and 4a & b. • Print your name and address on the reverse of this form so that we can return this card to you. • Attach this form to the front of the mailpiece, or on the back if space does not permit. • Write "Return Receipt Requested" on the mailpiece next to the article number.		I also wish to receive the following services (for an extra fee): 1. <input checked="" type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Don Kelly, Plant Mgr. FM&M P.O. Box 6 Brooksville, FL 34605-0006		4a. Article Number P 710 058 535	
		4b. Service Type <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise	
		7. Date of Delivery 5-26-92	
5. Signature (Addressee)		8. Addressee's Address (Only if requested and fee is paid)	
6. Signature (Agent) 			

PS Form 3811, October 1990

U.S. GPO: 1990-273-861

**DOMESTIC RETURN RECEIPT**



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

May 22, 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Kelly, Plant Manager  
Florida Mining & Materials  
Post Office Box 6  
Brooksville, Florida 34605-0006

Dear Mr. Kelly:

Re: Completeness Review for a Modification Request  
Kiln No. 2  
AC 27-212252 and PSD-FL-188

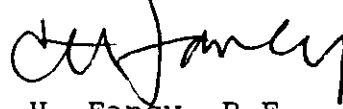
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2. Please redo the NO<sub>2</sub> PSD Class I cumulative increment modeling using the corrected input value referenced in comment # 1 above and all of the increment consuming sources previously identified.
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4. Please address the comments contained in the attached letters (i.e., Hernando County and National Park Service). Where the comment(s) is/are duplicated, please refer to a previous answer.

Mr. Don Kelly  
Page 2

If there are any questions, please call Bruce Mitchell or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,



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

CHF/BM/rbm

Attachments

cc: B. Thomas, SWD  
J. Koogler, Ph.D., P.E., K&A  
C. Shaver, NPS  
J. Harper, EPA  
C. Hetrick, HCBCC  
G. Smallridge, Esq., DER

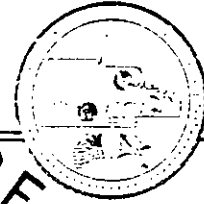
Ready file }  
Bruce } 5-22-92 agm  
Cleve }



Attachments

# Board of County Commissioners

Hernando County



20 N. Main Street, Room 460  
Brooksville, FL 34601

May 13, 1992 (904) 754-4000

FAX (904) 754-4471

RECEIVED  
MAY 18 1992  
Division of Air  
Resources Management

Secretary Carol Browner  
Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Dear Secretary Browner:

At the request of Mr. Clare Fancy of the Bureau of Air Regulation, Hernando County staff has reviewed the application for Florida Mining and Materials Kiln No. 2 Modification (AC 27212252, PSD-FL-188). Several questions resulted as part of the review, and the need for additional information was identified.

- 1) Describe the history of NOX emissions from kiln #2 including any changes in permitted emission rates, the reasons for those changes, and any violations of emission levels.
- 2) Provide the history of NOX emissions related to kiln #1 and describe any restrictions of NOX emissions from said kiln.
- 3) Provide a summary of the results of oxygen levels taken from the continuous exhaust gas oxygen monitor. Identify the point at which the oxygen levels would be representative of excess air in the kiln.

The Hernando County Board of County Commissioners addressed the modification in a Board meeting on May 12, 1992 and requested that the Department of Environmental Regulation schedule an informal meeting in Hernando County prior to issuance of any Intent in order to discuss the additional information needed. This meeting would also allow for questions raised by residents of the County during the May 12 meeting to be answered. Attendance by members of the Bureau of Air Regulation, the Office of General Counsel, and the Tampa District Office would be beneficial.

Please contact the County to discuss the logistics of establishing this meeting. Your assistance is appreciated.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles B. Hetrick".

Charles B. Hetrick  
County Administrator

cc: Lawrence Jennings, Planning Department Manager  
Tony Cleveland, Oertel, Hoffman, Fernandez and Cole, P.A.  
Clare Fancy, DER, Tallahassee  
Richard Garrity, DER, Tampa

5/17/92

*Brown*  
Do you have  
a copy of this?  
*Preston*

**DRAFT**

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

Dear Mr. Fancy:

We have completed our review of the material that you sent us regarding Southdown Inc.'s proposal to modify their existing Prevention of Significant Deterioration (PSD) permit. Southdown Inc., doing business as Florida Mining and Materials (FMM), operates a portland cement manufacturing facility and is proposing to increase the allowable emission rate of nitrogen oxides (NO<sub>x</sub>) from the existing No. 2 cement kiln from 162.3 to 250.0 pounds per hour, 30-day average. The higher allowable hourly emission rate will result in a significant increase in NO<sub>x</sub> emissions from the No. 2 kiln from 665.4 to 1025.0 tons per year. The facility is located near Brooksville, Florida, approximately 14 km east of the Chassahowitzka Wilderness Area, a Class I air quality area administered by the U.S. Fish and Wildlife Service.

We are pleased that the State required the applicant to submit additional analyses regarding cumulative increment consumption and visibility impacts. However, we do have some concerns regarding these analyses and the completeness of the application.

It should be made clear that the Class I PSD increment is for nitrogen dioxide (NO<sub>2</sub>) and not for NO<sub>x</sub> as referred to in the application and the supplemental analyses. The technique of summing previously modeled maximum impacts from other increment-consuming sources to predict the total NO<sub>2</sub> increment consumption is unconventional and it is not clear that all analyses used the same meteorological data set. If all analyses used the same meteorological data, we are willing to accept the analysis as an initial impact estimate for this application because there are a limited number of NO<sub>x</sub> sources in the area and the total estimated impacts are low (0.19 ug/m<sup>3</sup> annual average).

A visibility analysis was performed by the applicant as a supplemental analysis. The results are characterized as potential impacts from the proposed modification using VISCREEN Level 1 analysis. These results are neither a Level 1 or Level 2 analysis. Any changes to the default meteorological inputs used for the wind speed voids it as a Level 1 screening analysis. As indicated in the Environmental Protection Agency's Workbook for Plume Visual Impact Screening and Analysis (September 1988) "For Level-1 plume visual impact screening, the analyst should use the default input offered in Viscreen." Therefore, we performed an analysis using the screening Level 1 as recommended in the September 1988 workbook.

**DRAFT**

Our results showed that the proposed project fails the Level-1 screening test.

The next step is to perform a Level-2 screening analysis. This involves the use of less conservative assumptions as input to the model. For a Level-2 screening analysis the workbook calls for "the worst-case wind direction and speed and atmospheric stability". It recommends as important input "the joint frequency distribution of these parameters as measured at or near the location of the emission source." The applicant's analysis used a higher wind speed than the Level-1 default value and justified it by stating that it is "a more realistic wind speed." This is not a criteria for input in VISCREEN screening analyses.

The applicant needs to perform a Level-2 (and if necessary a Level-3) analysis for the proposed project according to the specifications in the workbook. Until this is done one cannot conclude that the proposed project will not impair visibility in the Chassahowitzka Wilderness Area.

We appreciate the opportunity to comment on the completeness of FMM's permit application. If you have any further questions regarding this matter, please contact Bud Rolofson of our Air Quality office in Denver at (303) 969-2071.

Sincerely,

James W. Pulliam, Jr.  
Regional Director

cc: Jellell Harper, Chief  
Air Enforcement Branch  
Air, Pesticides and Toxic Management Division  
U.S. EPA, Region 4  
345 Courtland Street, NE  
Atlanta, Georgia 30365

bcc:  
FWS-WASO: Don Voros, Chief, Resource Management  
FWS-REG. 4: AQC  
FWS-REG. 6: Ty Berry  
CHAS: Refuge Manager  
AQD-DEN: Bud Rolofson  
National Park Service - AIR  
P.O. Box 25287  
Denver, CO 80225

Preston



United States Department of the Interior

NATIONAL PARK SERVICE  
AIR QUALITY DIVISION  
P.O. BOX 25287  
DENVER, CO 80225

IN REPLY REFER TO:

DATE: 5/15/92

TIME: 11:30 AM

FAX PHONE NO. FTS 327-2822 or (303) 969-2822

NUMBER OF PAGES TO FOLLOW: 2

TO: Clair Fancy  
FDEP PHONE: 922-1979

FROM: Bob Robinson - FWS  
PHONE: 303-969-2804

SUBJECT: Southdown Completeness Review

REMARKS: We are sending an unsigned draft for  
your use. Signed copy will follow

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Hernando County



20 N. Main Street, Room 460  
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May 13, 1992 (904) 784-4009

FAX (904) 754-4477

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5/17/92

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*Preston***DRAFT**

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Air Enforcement Branch  
Air, Pesticides and Toxic Management Division  
U.S. EPA, Region 4  
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CHAS: Refuge Manager  
AQD-DEN: Bud Rolofson  
National Park Service - AIR  
P.O. Box 25287  
Denver, CO 80225

cc: B... }  
C... } 5-20-92 RR



Preston



United States Department of the Interior

NATIONAL PARK SERVICE  
AIR QUALITY DIVISION  
P.O. BOX 25287  
DENVER, CO 80225

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TO: Clair Fancy  
FDER PHONE: 922-6979

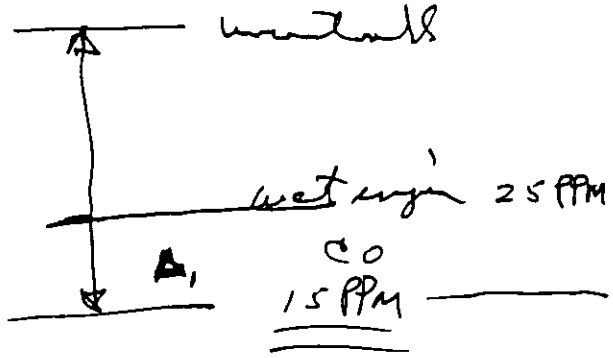
FROM: Bud Roloffson - FWS  
PHONE: 303-969-2804

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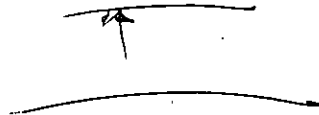
REMARKS: We are sending an unsigned draft for  
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TPY reduce

Cost



7000 ↑





**KOOGLER & ASSOCIATES**  
 ENVIRONMENTAL SERVICES  
 4014 NW THIRTEENTH STREET  
 GAINESVILLE, FLORIDA 32609  
 904/377-5822 • FAX 377-7158

KA 521-91-04

May 4, 1992

**RECEIVED**  
 MAY 05 1992  
 Division of Air  
 Resources Management

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

Subject: Class I NOx Impacts  
 No. 2 Cement Kiln Modification  
 Southdown, Inc.  
 Permit File No. AC27-212252, PSD-FL-188

Dear Mr. Fancy:

This is a follow up to our meeting on April 22, 1992, with Mr. Cleve Holladay and Mr. Bruce Mitchell concerning the changes to the Southdown dba Florida Mining and Materials No. 2 cement kiln nitrogen oxides emission limit and the corresponding Class I NOx PSD increment consumption and visibility impacts.

PSD Increment Analysis

The fraction of the Class I NOx PSD increment consumed at the Chassahowitzka National Wildlife Refuge can be conservatively estimated by adding previously modeled maximum impacts from sources consuming the increment to the maximum predicted impact from the proposed project.

The modeling conducted for the Pasco County cogeneration facility in June 1991 included the following NOx increment consuming sources:

Source	NOx Emission Rate Modeled (g/s)	Approximate Distance to Class I Area (km)
Lake Co. Cogeneration	11.64	90
Pasco Co. Cogeneration	11.64	50
City of Lakeland	21.04	90
Pasco Co. RRF	40.57	30
Enron-Silver Springs	1.33	70

The maximum predicted Class I impact from the above sources was  $0.13 \mu\text{g}/\text{m}^3$ . The maximum predicted Class I impact from the proposed Southdown project is  $0.06 \mu\text{g}/\text{m}^3$  (annual average). The maximum (worst-case) Class I NOx impact can be estimated to be the sum of the two impacts, or  $0.19 \mu\text{g}/\text{m}^3$  (annual average).

The projected worst-case NOx Class I impact of  $0.19 \mu\text{g}/\text{m}^3$  is approximately eight percent of the allowable Class I increment of  $2.5 \mu\text{g}/\text{m}^3$ .

The above analysis indicates that the proposed Southdown project will not cause or contribute to a Class I area PSD increment violation for NOx.

### Visibility Impacts

Visibility impairment can be quantified by evaluating such issues as the reduction of visual range, the perceptibility of plume shapes and haze layers, atmospheric discoloration and plume-influenced visual contrast of distant objects.

The EPA approved VISCREEN (plume visual impact screening) model was used to determine the visibility impacts of the proposed increase in NOx emissions from Southdown's No. 2 cement kiln.

The Level-I plume visual impact screening uses the VISCREEN model to obtain a conservative estimate of plume visual impacts. If a Level-I analysis indicates that a project will not cause adverse visibility impairment, a more rigorous Level-II or Level-III analysis is not required. The Level-I analysis provides a conservative estimate of visual impact (impacts that would be larger than those calculated with more realistic input and modeling assumptions) because it is based on worst-case meteorological conditions; extremely stable (F) atmospheric conditions coupled with a very low wind speed persisting for 12 hours with a wind that would transport the plume directly adjacent to the observer. The Level-I analysis also includes the use of default parameters reducing the model input requirements to emission rates of particulates and nitrogen oxides and distances between the observer and the Class I area boundaries.

The VISCREEN modeling conducted for the proposed project used the Level-I features and default options for all parameters except wind speed. In place of a 1.0 meter per second default wind speed, a more realistic average wind speed of 3.13 meters per second (seven miles per hour) was used. This wind speed is representative of Tampa, Gainesville and Orlando meteorological data with winds in the direction of the Class I area.



Mr. Cleve Holladay  
Florida Department of  
Environmental Regulation

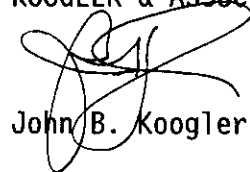
May 4, 1992  
Page 3

The results of VISCREEN modeling (attached) demonstrate that the NOx emission increase from the proposed project will not have a significant impact on visibility at the Chassahowitzka National Wildlife Refuge.

If you have any questions, please do not hesitate to give me a call.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK:wa  
Enc.

c: Mr. Don Kelly, Southdown  
Mr. Amarjit S. Gill, Southdown  
Mr. Cleve Holladay, FDER, Tallahassee  
Mr. Bruce Mitchell, FDER, Tallahassee

*B. Thomas, SA Dist,*  
*J. Harper, EPA*  
*C. Shaver, NPS*  
*C. Nettick, HCIBCE*  
*CHF/BA/PL*



Visual Effects Screening Analysis for  
 Source: FLORIDA MINING  
 Class I Area: Chassahowitzka

\*\*\* User-selected Screening Scenario Results \*\*\*

Input Emissions for

Particulates	.00	G /S	
NOx (as NO2)	11.06	G /S	(net increase from proposed project)
Primary NO2	.00	G /S	
Soot	.00	G /S	
Primary SO4	.00	G /S	

PARTICLE CHARACTERISTICS

	Density	Diameter
	=====	=====
Primary Part.	2.5	6
Soot	2.0	1
Sulfate	1.5	4

Transport Scenario Specifications:

Background Ozone:	.04 ppm
Background Visual Range:	25.00 km
Source-Observer Distance:	14.00 km
Min. Source-Class I Distance:	14.00 km
Max. Source-Class I Distance:	28.00 km
Plume-Source-Observer Angle:	11.25 degrees
Stability:	6
Wind Speed:	3.13 m/s

R E S U L T S

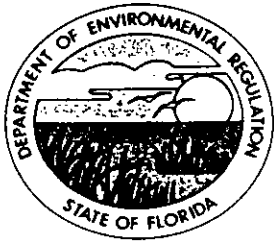
Asterisks (\*) indicate plume impacts that exceed screening criteria

Maximum Visual Impacts INSIDE Class I Area  
 Screening Criteria ARE NOT Exceeded

						Delta E	Contrast
						=====	=====
Backgrnd	Theta	Azi	Distance	Alpha	Crit	Plume	Crit
=====	=====	=====	=====	=====	=====	=====	=====
SKY	10.	125.	16.6	44.	2.00	.801	.05
SKY	140.	125.	16.6	44.	2.00	.260	.05
TERRAIN	10.	84.	14.0	84.	2.00	.237	.05
TERRAIN	140.	84.	14.0	84.	2.00	.077	.05

Maximum Visual Impacts OUTSIDE Class I Area  
 Screening Criteria ARE NOT Exceeded

						Delta E	Contrast
						=====	=====
Backgrnd	Theta	Azi	Distance	Alpha	Crit	Plume	Crit
=====	=====	=====	=====	=====	=====	=====	=====
SKY	10.	15.	8.2	154.	2.00	.995	.05
SKY	140.	15.	8.2	154.	2.00	.324	.05
TERRAIN	10.	5.	4.4	164.	2.00	.566	.05
TERRAIN	140.	5.	4.4	164.	2.00	.185	.05



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 23, 1992

Ms. Jewell A. Harper, Chief  
Air Enforcement Branch  
U.S. EPA, Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30308

Dear Ms. Harper:

RE: Southdown, Inc., dba Florida Mining and Materials  
No. 2 Kiln Modification  
Hernando County, PSD-FL-188

The Department has received the above referenced PSD application package. Please review this package and forward your comments to the Department's Bureau of Air Regulation by May 18, 1992. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact John Reynolds or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

*Patricia G. Adams*  
for C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

Enclosures



# Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

April 23, 1992

Mr. Charles B. Hetrick  
County Administrator  
Hernando County Government Center  
20 N. Main Street, Room 461  
Brooksville, FL 34601

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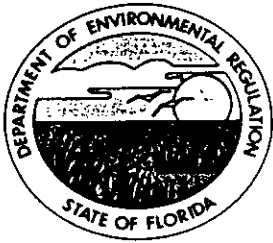
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*for* C. H. Fancy, P.E.  
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Lawton Chiles, Governor

Carol M. Browner, Secretary

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Mr. Bill Thomas  
District Air Program Administrator  
Southwest District  
4520 Oak Fair Blvd.  
Tampa, Florida 33610-7347

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Lawton Chiles, Governor

Carol M. Browner, Secretary

April 23, 1992

Mrs. Chris Shaver, Chief  
Permit Review and Technical Support Branch  
National Park Service-Air Quality Division  
Post Office Box 25287  
Denver, Colorado 80225

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Attendees

4/22/92 @ BAR @ Southdown Inc. (a.k.a. FL Mining & Materials)

Bruce Mitchell	FDER/DARM/BAR	904-488-1344
John Reynolds	DIER	"
Pradeep Ravel	Koofar & Assoc.	904 377 5822
AMARJIT SINGH GILL	SOUTHDOWN, INC.	713 653-8098
Clive Holladay	FDER/DARM/BAR	904-488-1344