Meeting on 2/12/92 @ BAR

McGill - Southdown / FM&M
Orikoogler - K & Assoc / PE of record
John Reynolds
Cleve Holladay
Me

Emission changes resulting from the proposed permit are summarized below:

	Current Allowable lb/hr	Current Allowable T/yr	Current Actual(1) lb/hr	Current Actual(1) T/yr	New Allowable(2) lb/hr	New Allowable(2) T/yr	Net Increase T/yr	Significant Increase T/yr
PM	21.6	85.3	7.7	30.4	13.5	55.3	24.9	25
SO_2	12.0	47.4	1.8	7.1	11.5	47.0	39.9	40
NOx	250.0	987.0	158.4	625.4	162.3	665.3	39.9	40
VOC	2.7	10.7	5.4	21.3	7.4	31.2	9.9	40
CO	8.9	35.1	41.1	162.3	64.0	262.2	99.9	100

(1) Based on the highest two 1989 stack test results
(2) New allowable (8200 hrs) vs. current actual 7896 (hrs)

It is presumed that the applicant will accept reductions in allowable emission limits that are necessary to avoid PSD review for particulate matter (PM), SO_2 and NOx. Any emission increase above these levels would require another evaluation including a Best Available Control Technology (BACT) determination, additional $4,000 application fee, and perhaps additional air modeling data (this evaluation does not address the air modeling data submitted with this application).

There is no objection to the request to use Flolite re-refined oil. This fuel has already been approved for use in kiln No. 1 at this facility.

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for each of the regulated air pollutants. Although the kiln is a major source, the proposed increases in emissions are less than the significant levels listed in Table 500-2 and therefore the proposed modification is not subject to the new source review requirements of F.A.C. Rule 17-2.500. Applicable rules are F.A.C. Rule 17-2.600(7)(b) and F.A.C. Rule 17-2.660, Standards of Performance for New Stationary Sources, Section 60.60, Subpart F, Portland Cement Plants.

IV. Conclusion

Based on the information provided by Florida Mining and Materials, the Department has reasonable assurance that the modification to kiln No.2, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

James K. Pennington
No. 34536
4/26/90

	Maximum allowable increase (micrograms per cubic meter)
n	19
	37
	20
	91
	325
nean	25

riance by Gov- and Manager's r or operator of r modification ved under para- ction may dem- ernor that the constructed by m allowable in- de for a period r less applicable d, in the case of ss I areas, that lause would not r quality related ncluding visibili- er consideration lanager's recom- d subject to his ter notice and a variance from ble increase. If ed, the Adminis- permit to such pursuant to the graph (q)(7) of That the appli- this section are

Governor with rrence. In any nor recommends he Federal Land cur, the recom- vernor and the r shall be trans- t. The President vernor's recom- 's that the vari- l interest. If the the Administra- mit pursuant to paragraph (q)(7) *ed.* That the ap-

plicable requirements of this section are otherwise met.

(8) *Emission limitations for Presidential or gubernatorial variance.* In the case of a permit issued pursuant to paragraph (q) (5) or (6) of this section the source or modification shall comply with such emission limitations as may be necessary to assure that emissions of sulfur dioxide from the source or modification would not (during any day on which the otherwise applicable maximum allowable increases are exceeded) cause or contribute to concentrations which would exceed the following maximum allowable increases over the baseline concentration and to assure that such emissions would not cause or contribute to concentrations which exceed the otherwise applicable maximum allowable increases for periods of exposure of 24 hours or less for more than 18 days, not necessarily consecutive, during any annual period:

MAXIMUM ALLOWABLE INCREASE

[Micrograms per cubic meter]

Period of exposure	Terrain areas	
	Low	High
24-hr maximum	36	62
3-hr maximum	130	221

(q) *Public participation.* The Administrator shall follow the applicable procedures of 40 CFR part 124 in processing applications under this section. The Administrator shall follow the procedures at 40 CFR 52.21(r) as in effect on June 19, 1979, to the extent that the procedures of 40 CFR part 124 do not apply.

(r) *Source obligation.* (1) Any owner or operator who constructs or operates a source or modification not in accordance with the application submitted pursuant to this section or with the terms of any approval to construct, or any owner or operator of a source or modification subject to this section who commences construction after the effective date of these regulations without applying for and receiving approval hereunder, shall be subject to appropriate enforcement action.

(2) Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Administrator may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

(3) Approval to construct shall not relieve any owner or operator of the responsibility to comply fully with applicable provisions of the State implementation plan and any other requirements under local, State, or Federal law.

(4) At such time that a particular source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements or paragraphs (j) through (s) of this section shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(s) *Environmental impact statements.* Whenever any proposed source or modification is subject to action by a Federal Agency which might necessitate preparation of an environmental impact statement pursuant to the National Environmental Policy Act (42 U.S.C. 4321), review by the Administrator conducted pursuant to this section shall be coordinated with the broad environmental reviews under that Act and under section 309 of the Clean Air Act to the maximum extent feasible and reasonable.

(t) *Disputed permits or redesignations.* If any State affected by the redesignation of an area by an Indian Governing Body, or any Indian Governing Body of a tribe affected by the redesignation of an area by a State, disagrees with such redesignation, or if a permit is proposed to be issued for any major stationary source or major modification proposed for construction in any State which the Governor of an affected State or Indian Governing Body of an affected tribe determines will cause or contribute to a cumulative change in air quality in excess of that allowed in this part within the affected State or Indian Reservation, the Governor or Indian Governing Body may request the Administrator to enter into negotiations with the parties involved to resolve such dispute. If requested by any State or Indian Governing Body involved, the Administrator shall make a recommendation to resolve the dispute and protect the air quality related values of the lands involved. If the parties involved do not reach agreement, the Administrator shall resolve the dispute and his determination, or the results of agreements reached through other means, shall become part of the applicable State implementation plan and shall be enforceable as part of such plan. In resolving such disputes relating to area redesignation, the Administrator shall consider the extent to which the lands involved are of sufficient size to allow effective air quality management or have air quality related values of such an area.

(u) *Delegation of authority.* (1) The Administrator shall have the authority to delegate his responsibility for conducting source review pursuant to this section, in accordance with paragraphs (v) (2) and (3) of this section.

(2) Where the Administrator delegates the responsibility for conducting source review under this section to any agency other than a Regional Office of the Environmental Protection Agency, the following provisions shall apply:

(i) Where the delegate agency is not an air pollution control agency, it shall consult with the appropriate State and local air pollution control agency prior to making any determination under this section. Similarly, where the delegate agency does not have continuing responsibility for managing land use, it shall consult with the appropriate State and local agency primarily responsible for man-

December 31, 1991

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Meeting Pertaining to Permits For Kilns # 1 & 2
Florida Mining and Materials (FM&M)

Dear Mr. Fancy:

As a follow up to my telephone conversation this morning, with Mr. John Reynolds of your office, I am writing to request a meeting with yourself, Mr. Reynolds and appropriate members of your staff on Friday, January 10, 1992 at 9:00 a.m. to discuss some permitting issues related to FM&M's kilns and auxiliary equipment. Specifically, we would like to discuss the operating hours and process feed rates for Kiln # 1, and the NO_x limits for Kiln # 2.

Mrs. Barbara Berardi and I from Southdown Inc. and Mr. Don Kelley, Plant Manager of FM&M will attend this meeting. Please call me at (713) 653-8098 if this presents a conflict with your schedule.

Sincerely,

Amarjit S. Gill

Amarjit S. Gill, P.E.
Senior Air Permitting Engineer

Southdown, Inc.
CITICORP CENTER, SUITE 2400, 1200 SMITH STREET, HOUSTON, TEXAS 77002-4486
TELEPHONE: (713) 650-6200