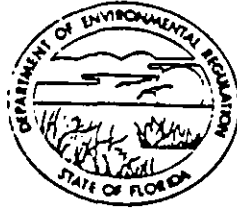


STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

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MAR 29 1990

DER-BAQM.

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. AC 27-173474

Applicant's Name: Florida Mining & Materials

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above reference license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 3rd day of May 1990.

The undersigned is authorized to make this waiver on behalf of the applicant.

This waiver is intended only to extend the 90 day period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes, by 30 days.

James S. Alves
Signature
James S. Alves
Hopping Boyd Green & Sams

Please Type Name of Signee
P. O. Box 6526, Tallahassee, FL 32314
March 28, 1990

Date

Sworn to and subscribed
before me this 28th day
of March 1990.

Alvin B. Barber
Notary Public

My commission expires: My Commission Expires May 17, 1990
Notary Public, State of Florida
Bonded thru Froy Fair Insurance, Inc.

DER Form 17-1.201(8)

Effective November 30, 1982

Page 1 of 2

Patly -
Glad we got this -
I'll talk to Peter on
what they intend to do.

3/30

Clan

Section 120.60, Florida Statutes

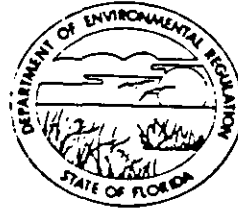
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Section 403.0876, Florida Statutes

Permits; processing. ---Within 30 days after receipt of an application for a permit under this chapter, the department shall review the application and shall request submittal of all additional information the department is permitted by law to require. If the applicant believes any departmental request for additional information is not authorized by law or departmental rule, the applicant may request a hearing pursuant to s. 120.57. Within 30 days after receipt of such additional information, the department shall review it and may request only that information needed to clarify such additional information or to answer new questions raised by or directly related to such additional information. If the applicant believes the request of the department for such additional information is not authorized by law or departmental rule, the department, at the applicant's request, shall proceed to process the permit application. Permits shall be approved or denied within 90 days after receipt of the original application, the last item of timely requested additional material, or the applicant's written request to begin processing the permit application.

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BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

RECEIVED

MAR 29 1990

DER-BAQINI

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. AC 27-173474

Applicant's Name: Florida Mining & Materials

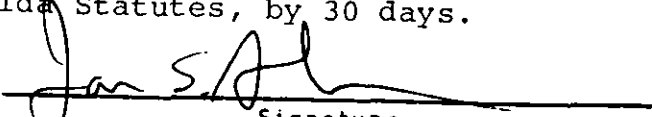
The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above reference license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 3rd day of May 1990.

The undersigned is authorized to make this waiver on behalf of the applicant.

This waiver is intended only to extend the 90 day period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes, by 30 days.


Signature

James S. Alves
Hopping Boyd Green & Sams

Please Type Name of Signee
P. O. Box 6526, Tallahassee, FL 32314
March 28, 1990

Date

Sworn to and subscribed
before me this 28th day
of March 1990.


Notary Public

Notary Public, State of Florida
My Commission Expires May 17, 1990
Bonded thru Troy Fair - Insurance Inc.

My commission expires: My

DER Form 17-1.201(8)

Effective November 30, 1982

Section 120.60, Florida Statutes

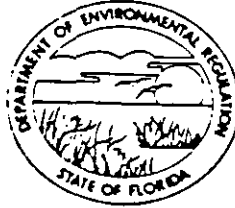
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Section 403.0876, Florida Statutes

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DEPARTMENT OF ENVIRONMENTAL REGULATION

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TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

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FEB 12 1990

DER-BAQM

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTIONS 120.60(2) AND 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No. AC 27-138850

Applicant's Name: Florida Mining & Materials

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above reference license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 3rd day of April 1990.

The undersigned is authorized to make this waiver on behalf of the applicant.

This waiver is intended only to extend the 90 day period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes, by 30 days.

Peter C. Cunningham
Signature

Peter C. Cunningham

Please Type Name of Signee
Hopping Boyd Green & Sams
P. O. Box 6526, Tallahassee, FL 32314

2/12/90 Date

Sworn to and subscribed
before me this 12th day
of February 1990.

Gloria S. Barber
Notary Public

My commission expires: My Commission Expires May 17, 1990
Notary Public, State of Florida
Funded thru Troy Inc. - Insurance Inc.

DER Form 17-1.201(8)

Effective November 30, 1982

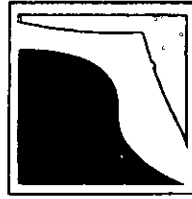
Page 1 of 2

Section 120.60, Florida Statutes

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FLORIDA MINING & MATERIALS

CONSTRUCTION MATERIALS DIVISION

P. O. BOX 6, BROOKSVILLE, FLORIDA 34605-0006
TELEPHONE (904) 796-7241

C. M. COLEMAN, JR.
VICE PRESIDENT & GENERAL MANAGER

March 20, 1990

Mr. C. H. Fancy, P. C., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 338
Tallahassee, Florida 32399-2400

Re: Amendment of Permit No. AC 27-138850
New Permit No. AC 27-173474

Dear Mr. Fancy:

Florida Mining & Materials submitted an application to amend the referenced Department Air Permit for its Brooksville Cement Plant Kiln No. 2 on December 1, 1989. While the Department did not request any additional information, the Region IV office of the U. S. Environmental Protection Agency commented on the application by letter dated January 10, 1990. We have reviewed Mr. Miller's comment letter and would like to take this opportunity to respond.

The Region IV letter states that the "netting calculation" contained in Florida Mining's application was incorrect, and that the correct calculation "should be proposed allowable emission - existing actual emissions (based on data)." Florida Mining believes the approach set forth in its application is valid under the Department's rules. In an effort to avoid delay in the permitting process, however, our consultant has performed the emission comparisons calculation in the manner suggested by Region IV. Accordingly, please find attached a permit application addendum submitted in response to Region IV's comment letter.

Florida Mining is prepared to accept the "Current Proposed Allowable Emissions" as set forth in Table 3 of the addendum, in the amended construction permit for Kiln No. 2. These emission rates ensure that the permit amendment will not result in a significant net emissions increase based on a comparison of past actual emissions (utilizing statistical analysis of historical emissions testing data) and proposed allowable emissions. Please note that Florida Mining has revised the requested annual hours of operation for Kiln No. 2 from

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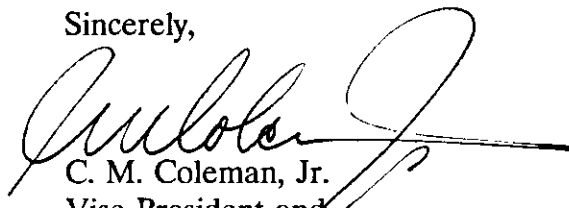
Mr. C. H. Fancy, P. E., Chief
March 5, 1990
Page 2

from 8400 hours per year to 8200 hours per year.

In closing, I would emphasize that Florida Mining's decision to revise the application in response to Region IV's comment should not be construed as agreement that other emission comparison approaches are incorrect. In fact, the Region IV approach could penalize a facility that has maintained emission rates lower than those required by permit conditions established to reflect Best Available Control Technology.

Please do not hesitate to call me or Joe Tessitore (404/851-1484) if you or your staff have any questions regarding this submittal.

Sincerely,



C. M. Coleman, Jr.
Vice President and
General Manager

CMC/mmfm

Enclosures

cc: John Reynolds

B. Thomas, SW Dist.
B. Miller, EPA

PERMIT APPLICATION ADDENDUM

**FLORIDA MINING AND MATERIALS
NO. 2 KILN**

March 21, 1990

*This document is submitted in addendum to the
Application to Amend Air Pollution Source Permit,
December 1, 1989.*

Cross/Tessitore & Associates, P.A.
4763 South Conway Road, Suite F.
Orlando, Florida 32812
(407) 851-1484
F03.178/R5108.Doc

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1.0 INTRODUCTION

The analysis provided here is offered in response to comments made by the Region IV Office of the U.S. Environmental Protection Agency on the Application to Amend Air Pollution Source Permit submitted for Florida Mining and Materials No. 2 Kiln, to the Florida Department of Environmental Regulation on December 1, 1989.

These comments focused on calculations included in the application to determine the net annual emissions increases which would result from the proposed permit amendments. In specific, the new annual increases calculated were due to the proposed increase in annual hours of production. For purposes of calculating net increases, it was assumed that current actual emissions are essentially equal to the current permitted allowable emissions in lbs/hr. Comments issued by U.S. EPA, however, indicated that actual emissions should be based on existing operating data. The following analysis, therefore, provides revised calculations to comply with this requirement.

2.0 METHODOLOGY

The first step in revising the previously submitted emissions calculations was to establish values for current actual emissions of each regulated compound. As required, historical operating data was used as a basis for determining these values. Included in Appendix A is a summary of emissions testing results for the No. 2 Kiln. From this data, the mean tested emissions rate was calculated for Particulate, Sulfur Dioxide, and Nitrogen Dioxide (NO_x). The standard deviation was then calculated for each of these three sets of data, according to the following equation:

$$SD = \frac{(\sum (v_i - \bar{v})^2)^{\frac{1}{2}}}{(n - 1)^{\frac{1}{2}}}$$

Where SD = Standard Deviation
 V_i = Data Point
 \bar{v} = Mean
 n = Number of Data Points

The test results included in Appendix A actually represents only a sample of the entire population of operating data which could be obtained. Further, testing is often conducted during only optimum operating conditions. It was, therefore, necessary to adjust the mean tested emission rates to be more representative of actual operating conditions.

It is assumed that, throughout the typical operating year, actual emissions may vary as much as three standard deviations above the mean tested emissions rate for each compound. Therefore, the following equation was used to calculate actual emissions for Particulate, Sulfur Dioxide, and Nitrogen Dioxide (NO_x):

$$\text{Actual Emissions} = \bar{V} + 3(SD)$$

Sufficient test data was not available for Volatile Organic Compounds and Carbon Monoxide to establish a reliable statistical value for actual emissions. However, calculations which were included in the December 1, 1989 permit application provide a basis for actual emissions rates of these compounds. Table 1 provides a summary of actual emissions for each regulated compound.

The next step in revising the emissions calculations was to determine values for proposed allowable emissions for each compound. Florida Mining and Materials does not wish to propose a net emissions increase which would result in a Prevention of Significant Deterioration (PSD) review. Therefore, Table 2 was developed to calculate the maximum allowable emissions rate for PSD. In this analysis, the following procedures were followed:

- 1) The actual emissions rate for each compound was multiplied by the actual hours of operation in 1989 to determine the annual actual emissions rate in ton/yr.
- 2) This value was then increased by the PSD significant emissions rate to obtain the annual emissions rate allowable for PSD.
- 3) This annual allowable emissions rate was used, along with the proposed operating schedule of 8,200 hrs/yr, to obtain an allowable emissions rate on an hourly basis.

It should be noted that the proposed operating schedule has been reduced from 8,400 hrs/yr in the December 1, 1989 permit application to 8,200 hrs/yr.

Given the values for PSD in Table 2, it was then necessary to establish what levels should be proposed as allowable emissions. This was achieved by using the following criteria:

- 1) For Particulate, Sulfur Dioxide, and Nitrogen Dioxide (NO_x), the allowable emissions for PSD from Table 2 were compared with the current permitted allowable levels. Of these two values, the lesser was selected as the proposed allowable emissions rate.
- 2) For Volatile Organic Compounds and Carbon Monoxide, the actual emissions rate calculated in the December 1, 1989 permit application and listed in Table 1, was established as the proposed allowable emissions rate.

A summary of the proposed allowable emissions for each compound is provided in Table 3. Table 4 presents a revised version of Table III-2, submitted in the December 1, 1989 Permit Application.

TABLE 1
ACTUAL EMISSIONS SUMMARY

	Mean Tested Emissions Rate (lb/hr)	Standard Deviation (lb/hr)	Actual Emissions (lb/hr)
Particulate	7.31	2.75	15.56
Sulfur Dioxide	3.64	2.80	12.03
Nitrogen Dioxide (NO _x)	149.70	32.35	246.76
Volatile Organic Compounds*	----	----	7.44 *
Carbon Monoxide*	----	----	79.2 *

* Actual emissions for these compounds are based on calculations provided in the December 1, 1989 Permit Application.

TABLE 2
CALCULATED ALLOWABLE EMISSIONS FOR PSD
(Actual Emissions During History of Kiln #2 with Proposed 8200 Hours per Year Operation)

Parameter	Actual Emissions Rate (lb/hr)	1989 Actual Operating Hours (hrs/yr)	Annual Actual Emissions Rate (ton/yr)	PSD Significant Emissions (ton/yr)	Allowable Emissions Rate (ton/yr)	Allowable Emissions Rate (lb/hr)*
Particulate	15.56	7892.7	61.41	25	86.41	21.08
▶ Sulfur Dioxide	12.03	7892.7	47.47	40	87.47	21.33
Nitrogen Dioxide (NO _x)	246.76	7892.7	973.80	40	1013.80	247.27
Volatile Organic Compounds	7.44	7892.7	29.36	40	69.36	16.92
Carbon Monoxide	79.2	7892.7	312.55	100	412.55	100.62

* Calculated based on proposed schedule of 8200 hours/yr.
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TABLE 4
AIRBORNE EMISSIONS COMPARISON*

Parameter	Current Actual Emissions		Proposed Allowable Emissions		Actual Emissions Increase T/yr	Significant Net** Increase T/yr
	lb/hr	T/yr	lb/hr	T/yr		
Particulate	15.56	61.41	21	86.10	24.69	25
Sulfur Dioxide	12.03	47.47	12	49.20	1.73	40
Nitrogen Dioxide (NO _x)	246.76	973.80	247	1012.7	37.92	40
Volatile Organic Compounds	7.44	29.36	7.44	30.50	1.14	40
Carbon Monoxide	79.2	312.55	79.2	324.72	12.17	100

* Revised from Table III-2 in the December 1, 1989 Permit Application.

** Based on PSD significance criteria.

TABLE 3
PROPOSED ALLOWABLE EMISSIONS

	Current Proposed Allowable Emissions (lb/hr)	Previous Proposed⁽³⁾ Allowable Emissions (lb/hr)
Particulate	21 ⁽¹⁾	21.6
Sulfur Dioxide	12 ⁽²⁾	12.0
Nitrogen Dioxide (NO _x)	247 ⁽¹⁾	244.0
Volatile Organic Compounds	7.44 ⁽³⁾	7.44
Carbon Monoxide	79.2 ⁽³⁾	79.2

(1) Calculated based on actual emissions rate, PSD significant emissions rate, and a proposed operating schedule of 8,200 hrs/yr.

(2) Based on current permit limit.

(3) As proposed in December 1, 1989 Permit Application.

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APPENDIX A
OPERATING DATA

TABLE A-1
 EMISSIONS TESTING SUMMARY 1
 NO. 2 KILN

Testing Date	Kiln Feed (ton/hr)	Gas Flow Rate		Stack Temp. (°F)	Particulate Emissions	
		(ACFM)	(SCFM)		(gr/dscf)	(lb/hr)
09/23/82	112	227,458	145,524	265	0.0055	6.5
10/11/82	108	225,887	147,768	249	N/A	N/A
04/16/84	111	228,166	153,810	223	0.0065	8.66
04/22/85	113	219,461	143,475	268	0.0111	13.47
04/28/86	120	217,356	148,696	231	0.0048	6.15
08/20/86	120	N/A	148,033	N/A	N/A	N/A
04/13/87	129	210,073	143,723	234	0.0031	3.83
09/23/87	120.1	220,836	149,441	234	N/A	N/A
03/28/88	124	227,058	179,642	230	0.0036	4.8
06/29/88	122.5	235,856	161,250	229	N/A	N/A
05/22/89	120	273,638	177,707	281	0.0052	7.83
05/23/89	138.5	268,282	174,255	269	0.004686	7.00
10/17/89 through 10/19/89	118.2	287,684	188,945	270	0.00468	7.51

TABLE A-2
EMISSIONS TESTING SUMMARY 2
NO. 2 KILN

Testing Date	Sulfur Dioxide Emissions (lb/hr)	Nitrogen Oxide (NO _x) Emissions (lb/hr)	Volatile Organic Compounds Emissions (lb/hr)	Carbon Monoxide Emissions (lb/hr)
09/23/82	N/A	74.75	N/A	N/A
10/11/82	3.6*	N/A	N/A	N/A
04/16/84	4.63	141.2	N/A	N/A
04/22/85	9.53	128.4	N/A	N/A
04/28/86	2.4	N/A	N/A	N/A
08/20/86	N/D	111.9	N/A	N/A
04/13/87	4.77	172.81	N/A	N/A
09/23/87	N/D	N/A	N/A	N/A
03/28/88	N/D	N/A	N/A	N/A
06/29/88	N/A	117	N/A	N/A
05/22/89	1.98	127.2	N/A	N/A
05/23/89	1.61	181.8	N/A	44.8
10/17/89 through 10/19/89	0.566**	135	4.5	37.4

* Discarding Run No. 3 (Raw Mill down), average measured emissions = 1.00 lb/hr

** Value represents average of three runs. Data for this test date previously submitted in December 1, 1989 Permit Application represented only test runs conducted while raw mill was down.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

JAN 10 1990

4APT-APB-cdw

Ms. Patricia G. Adams
Planner
Bureau of Air Quality Management
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Florida Mining and Materials (PSD-FL-124)

Dear Ms. Adams:

This is to acknowledge receipt of the application for a proposed amendment to the above referenced permit dated December 7, 1989. As discussed between Mr. Barry Andrews of FDER and Mr. Gregg Worley of my staff on January 8, 1990, we have the following comment.

The netting calculation performed by the applicant was incorrect. The applicant used permitted allowable emissions as actual emissions rather than using existing emissions based on the previous two years of operating data. The correct calculation should be proposed allowable emissions-existing actual emissions (based on data).

The emissions changes should be evaluated correctly to determine whether the proposed change is significant for any pollutant.

Thank you for the opportunity to review this package. Any questions or comments may be directed to Mr. Gregg Worley of my staff at (404) 347-2864.

Sincerely yours,

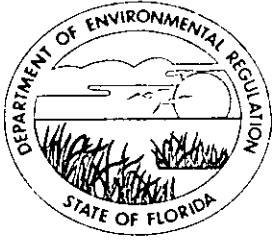
Bruce P. Miller, Chief
Air Programs Branch
Air, Pesticides, and Toxics
Management Division

copied: J. Reynolds
B. Andrews
C. Holladay
R. Thomas, SW Dist.
CHF/BT

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JAN 12 1990

DER-BAQM



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

December 7, 1989

Mr. Wayne Aronson, Chief
Program Support Section
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Dear Mr. Aronson:

RE: Florida Mining & Materials
Permit Amendment
PSD-FL-124

Enclosed for your review and comment is the above referenced PSD permit amendment request. If you have any comments or questions, please contact John Reynolds at the above address or at (904)488-1344.

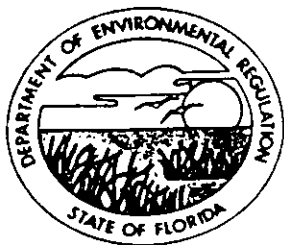
Sincerely,

Patricia G. Adams

Patricia G. Adams
Planner
Bureau of Air Regulation

/pa

Enclosure



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garnity, Deputy Assistant Secretary

November 21, 1989

RECEIVED

NOV 27 1989

DER-BAQM

Mr. Joseph L. Tessitore
Vice President
Cross/Tessitore & Associates
4763 South Conway Road
Suite F
Orlando, FL 32812

Dear Mr. Tessitore:

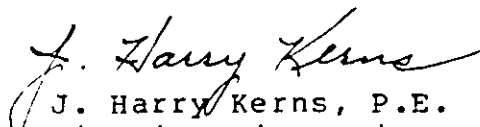
Re: Florida Mining & Materials
Kiln No. 2 Permit AC27-138850

In your letter of November 3, 1987 you requested permission to use Flotite as required and to operate on occasions without the raw mill in order to develop operating parameters pursuant to submittal of an application for modification of the above referenced construction permit.

As you know we cannot authorize you to operate in a manner that is not consistent with your construction permit. However, it is possible that a test plan describing the parameters, schedule and duration can be approved.

If you still wish to proceed with the described test, please submit a justifiable test plan along with available backup information.

Sincerely,


J. Harry Kerns, P.E.
District Air Engineer

JHK/mbq

cc: Bill Thomas, Tampa
Clair Fancy ✓