



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 21, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Kelly:

Re: Southdown, Inc. Modification of Permits
Kilns 1 and 2, Coolers 1 and 2
Permit No. 001-0530010 AC (PSD-FL-233)

Further to our letter of March 8, 1996, the Department has reviewed the request to modify the above referenced permits. Based on a technical review, the application is deemed incomplete. Pursuant to Rules 62-210, 62-212, 62-272, 62-275, 62-296, 62-297 and 62-4.070, F.A.C., please submit the following information to the Department, including all assumptions, reference materials and calculations:

GENERAL

1. The information requested in our letter of March 8 to allow a determination as to the applicability of Prevention of Significant Deterioration (PSD). Without that information, it is not at all clear that the request is a PSD matter and insufficient reasons are presented to warrant any amendment of existing limits.
2. Does this facility comply with all the Hernando County air pollution control regulations? Please provide brief input so we can respond to the attached letter from the County.

EMISSION DATA

3. Submit existing test data (last five years) for NO_x, SO₂, PM/PM₁₀, Sulfuric Acid Mist, CO, and VOC, Pb , as well any non-criteria PSD pollutants for kilns No. 1 and No. 2. This is necessary to calculate all contemporaneous emissions changes.

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4. Submit existing data for all other HAPs pollutants that have been tested at this facility in the past five years. Include dates, baseline conditions, production rates and fuel burned.

PROCESS EVALUATION

5. Submit for this facility an operation and maintenance plan for the particulate control devices, the collection systems, and the processing systems. The Operation and Maintenance plan shall also include identification of control device(s) for each emissions unit (manufacturer, model name, number, etc.).

6. Indicate the performance parameters of the control devices (baghouses) used on the kilns and coolers, such as:

Bag pressure drop

Gas flowrate: direct method preferred; indirect method acceptable

Air to Cloth ratio

Bag Weave

Bag Material

Gas Temperature, inlet and outlet

Bag cleaning conditions:

Pulse: Air Pressure

Shake: Shaker motor current

Reverse: Reverse air fan current

Bag Cleaning cycle:

Shake: Duration, frequency, and delay periods

Reverse: Duration, frequency, and delay periods.

Please submit an outline of the record of inspections, maintenance and performance data.

7. Submit design specifications for the kiln and cooler stack transmissometers. When were they certified? How often have they been audited?

8. Describe procedures used for startup and shutdown of the process equipment to minimize excess emissions.

9. Include a detailed engineering design specification of the control devices (baghouses) used at this facility. If these designs have already been submitted with a previous application, please indicate the appropriate permit number.

10. Include a detailed process flow diagram of the facility. If this process flow diagram has already been submitted with a previous application, please indicate the appropriate permit number.

11. Describe good combustion practices to minimize NO_x, CO, and VOC emissions from the kiln.
12. Submit a detailed analysis of specifications and quantities of the different fuels to be burned at each kiln.
13. Submit a detailed analysis of the components of all the feedstreams. Indicate the precise mix proportion for the raw mill feed.
14. Describe how captured dust from the baghouses (Kiln No.1 and Kiln No.2) is removed from the system and disposed. What precautions are used to minimize unconfined emissions while handling the dust?
15. What reasonable precautions are used to minimize unconfined particulate matter emissions from this plant (quarries, haul roads, CKD handling system equipment, dust disposal piles, manufacturing area, etc.)?
16. Is this facility subject to 40 CFR 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants?
17. Is any storage tank at this facility subject to 40 CFR 60, Subpart K, Ka, or Kb? What is the capacity of each tank used to storage the different fuel at this facility?
18. It is our understanding that this facility stopped burning tires and flolite in the two kilns. Please verify and advise if the permit should be amended accordingly.

BACT EVALUATION

19. Although this facility is already operating, and Southdown is proposing emission increases only for CO, VOC and PM/PM₁₀, the Department will consider revising limits for SO₂, NO_x and other PSD pollutants as part of the review. Based on this rationale, the BACT analysis must be expanded to cover all PSD pollutants emitted at this facility.

COAL PREPARATION PLANT

20. Describe how coal is being handled at this facility. Is this facility subject to 40 CFR 60, Subpart Y?

COAL ASH HANDLING

21. Describe how coal ash is being handled at this facility? Submit an analysis of the coal ash being used.

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AIR QUALITY ANALYSIS

22. Perform an expanded Air Quality Related Values analysis to address impacts of the proposed changes on soils, vegetation, and visibility in the Class II area in the vicinity of the plant.

We will resume processing the application as soon as we receive the responses from our first letter. Please provide the information requested in the present letter in a timely fashion so we can continue processing the permit application thereafter.

If you have any questions on this matter write to me or call Teresa Heron (Review Engineer) or Cleve Holladay (meteorologist) at (904) 448-1344.

Sincerely,

Willard Hanks
for
A. A. Linero, P.E.
Administrator
New Source Review Section

AAL/th/t

cc: J. Harper, EPA
J. Bunyak, NPS
B. Thomas, SWD
L. Garcia, HCEPD
A. Gill, Southdown
J. Koogler, P.E.

Is your RETURN ADDRESS completed on the reverse side?

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 will show to whom the article was delivered and the date delivered.

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

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Don Kelly, Plant Mgr
 Southtown, Inc
 PO Box 6
 Brooksville, FL
 34605-0006

4a. Article Number
 Z 127 633 192

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

7. Date of Delivery
 MAR 25 1996

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)
 34601

6. Signature (Agent)
[Signature]

Thank you for using Return Receipt Service.

Z 127 633 192



Receipt for Certified Mail

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

Sent to <i>Don Kelly</i>	
Street and No. <i>Southtown Inc</i>	
P.O. State and ZIP Code <i>Brooksville FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>2-21-96</i>

PS Form 3800, March 1993

PSD-F1-233

Board of County Commissioners

Hernando County

PLANNING DEPARTMENT

Government Center / Administration Building
20 North Main Street, Room 262
Brooksville, Florida 34601 - 2828



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

March 8, 1996

Mr. Cleve Holladay
Bureau Air Regulation
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Southdown, Inc. Brooksville Plant, Hernando County
Permit Number 0530010-001-AC
PSD-FL-233

Dear Mr. Holladay:

Hernando County staff have reviewed the above referenced PSD application. Our comments and questions are provided below.

1. Based on our staff review of the application it appears that Southdown is requesting that they be allowed the same BACT emission rates as Florida Crushed Stone was allowed in their recent AC permit. These requested BACT emission rates result in significant increases in the annual emissions of PM/PM10 and CO. Are the two operations similar enough to warrant equivalent BACT emission rates?
2. Why is there no emission limit for VOCs for Kiln #1? Could a VOC emission limit be established for Kiln #1 during this permitting process?
3. Has the National Park Service (NPS) been notified of the proposed modification? Please copy this Department on any correspondence between your agency and the NPS.
4. According to AC27-258571 (Specific condition #14), the CO emission rate shall not exceed 57.7 lbs/hr, 234.4 tons per year while firing waste tire derived fuel with coal. This limit was requested by the permittee (Southdown) to avoid new source review requirements pursuant to Rules 62-212.400(2)(d) and (g) and 62-212.400(5), FAC. Does the proposed

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BUREAU OF
AIR REGULATION

CO emission increase require NSR review? Is NSR review different from PSD review?

5. The net increase in annual emissions for CO from 496.8 TPY to 1439 TPY is more than than a 200% increase. To the lay person, it certainly seems that an increase in emissions of this magnitude could have significant negative impacts on the air quality in the vicinity of the source. Please address these increases and explain why they will or will not have significant impacts on ambient air quality

I would appreciate a written response from DEP staff regarding these questions and comments so that we may include them in our files. I realize these questions may be simple and a result of our staff's inexperience in air permitting, however, by answering these questions, you enable us to answer questions brought up by our Board of County Commissioners. Additionally, please note that these are initial comments and questions by staff, and do not reflect comments or questions that may be submitted at a later date following review by the Board of County Commissioners.

If you have any questions or would like to discuss this information, please contact Ms. Lizanne Garcia at (352)754-4057 (SunCom 669-4057).

Thank you for your cooperation in this matter.

Sincerely,



Lawrence Jennings
Department Director

KLG

pc: Charles Hetrick, County Administrator
T. Heron, DEP Bureau of Air Regulation

cc: EPA
NPS
SWD
Koosler & Assoc.



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

March 8, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Dear Mr. Kelly:

RE: Modification of Permit AC27-258569, -258570, -258571, -258572
Kilns 1 and 2, Coolers 1 and 2 (PSD-FL-233)

The Department is in receipt of your application dated February 22, 1996 requesting changes in the permitted carbon monoxide and particulate emission limitations for the subject kilns and coolers. The staff has started its review and will prepare a more detailed completeness letter shortly. In the meantime we wanted to pass along to you some concerns following a cursory review.

It is not clear what specific modification or operational change is responsible for triggering PSD review. The "correction" of limits to comply with recent BACT determinations at similar facilities is not a sufficient reason to amend a previous determination which was made specifically to avoid PSD. To conform to recent BACT determinations, we would necessarily need to look at all emitted pollutants including SO₂ and NO_x, as well as the ones for which changes have been requested.

In reviewing the existing permits which Southdown provided in the application, we note that there are various references to triggering PSD if emissions increase beyond certain values as a result of burning tires. We understand that Southdown is not burning tires now.

Please provide a chronological listing of the emission limitations (SO₂, CO, NO_x, PM, VOC) for each kiln and cooler as they have been amended by the various permitting actions by the Department. Include the activity which required the amendments and whether or not Southdown is still authorized to engage in the activity. This will aid us in determining exactly what has caused the requested emission increases.

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With respect to increasing visible emissions we need to know what fraction of the time Southdown exceeds (or plans to exceed) the presently applicable 10 percent opacity limit. We would prefer not to increase the 10 percent standard to 20 percent especially if such an increase is not needed at all times. Please provide assurances that Southdown can meet the permitted and requested PM limits while exhibiting an opacity of 20 percent.

If you have any questions regarding this matter, please call Teresa Heron or Al Linero at (904)488-1344.

Sincerely,



C. H. Fancy
Chief
Bureau of Air Regulation

CHF/th/t

cc: J. Harper, EPA
P. Bunyak, NPS
J. Braswell, DEP
W. Thomas, SWD
J. Koogler, P.E.
A. Gill, Southdown