

Department of Environmental Protection

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Southwest District
3804 Coconut Palm Drive
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Secretary

Received Dec 22, 97

FACSIMILE TRANSMISSION SHEET

DATE 12/17/97

*Talked to Zell
David Zell
on 12/22
at 2:11:50am*

To: Al Linero and Teresa Heron, DARM/BAR NSR Section

Phone #: Fax #: (850) 922-6979

From: David Zell - Permit Engineer

DEP Southwest District Office - Air Program

Phone: (813) 744-6100 Ext. 118

Operator: DRZ

Subject: Southdown, Inc. - Revised Title V Application w/ Modification Requests

Attached is a copy of the October 20, 1997 cover letter that accompanied Southdown's ELSA electronic submittal of their revised Title V application (which by the way we cannot view or print because EARS is non-functional in the SWD !). In the letter they reference modifications made in BAR-issued construction permit 0530010-003-AC (PSD-FL-233) (issued on June 27, 1997) and request that certain changes be made to the operating hour and operating rate limitations of other Kiln No. 1 emission units "to reflect the provisions of PSD-FL-233". In addition they request changes to testing frequency on both kilns and clinker coolers and request the lowering of a PM limit on a cement silo baghouse. It appears from the language of the letter ("As part of this Title V application ...") that they are requesting that these changes be made as part of the Title V permitting process.

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All of the operating hour and process rate limitations to be changed (as well as the PM limit to be lowered) were established in construction permits. We feel that this makes these changes modifications requiring a construction permit. Southdown claims that the changes do not trigger a PSD review because they will not in result a significant net increase of PM or PM10 (spreadsheet attached to letter shows PM increase of 17.5 TPY and PM10 increase of 14.89 TPY). We wonder why these modifications were not processed as part of the PSD-FL-233 application (did this subject of additional modifications to other EU's associated with Kiln No. 1 come up during processing of the application?) and whether emission increases associated with the requested set of modifications are not really a part of the PSD-FL-233 project. Please let us know your thoughts on these issues. (AC required? PSD review triggered? Link to PSD-FL-233?)

The testing frequency requirement for the kilns and clinker coolers was just recently established by BAR in Specific Condition No. 5.1 of PSD-FL-233. We question whether it is appropriate for the District to consider making this change so soon after the PSD permit was issued. Is Southdown possibly sidestepping BAR NSR Section by requesting this change from the District? Was the change requested by Southdown during the PSD permit processing and intentionally not granted by BAR? Would a change in test frequency be considered as a modification of the PSD permit thereby requiring an AC? In addition to the above questions, we have no precedent for using a '80% of the limit' criteria for reducing test frequency from annually to once every 5 years based on one compliance test. In the past when we have reduced test frequency it has been based upon a history of testing at levels significantly lower than 80% of the allowable. Southdown references as its main justification the upcoming MACT rule for cement plants (which we have not seen yet to my knowledge). Please comment on the above issues and how you feel that we should handle this testing frequency request.

Thank you very much for your assistance and cooperation.

Total Number of Pages, Including Cover Page: 6

DEP SWD Air Program Fax Number : (813) 744-6458



RECEIVED
NOV 05 1997
Department of Environmental Protection
BY SOUTHWEST DISTRICT

October 20, 1997

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Re: Southdown Inc. Title V Permit Application Revision

Dear Dr. Garrity:

Enclosed is a revised submission of Southdown's application (4 copies) for a Title V permit for our Portland cement manufacturing plant near Brooksville originally filed on June 13, 1996. We are submitting Section I and a resigned Compliance Statement (Attachment H) in hard copy, and Sections II and III in ELSA 1.3b.

The major reason for this revised submission is to reflect the provisions of PSD-FL-233 issued on June 20, 1997. One of the significant changes in this Prevention of Significant Deterioration (PSD) permit is to increase the permitted hours for the No. 2 kiln and clinker cooler from 8200 to 8760 h/yr. As part of this Title V application, Southdown is requesting that the allowed operating hours for six other sources related to the No. 2 kiln system also be increased from 8200 to 8760 hours per year. To be consistent, it is also necessary to increase the permitted throughput for the No. 3 clinker silo (LO7) from 84 tons/h to 100 tons/h. Finally, Southdown is requesting that the throughput limits for the No. 1 kiln clinker silos (F31) be increased to 8760 h/yr and 100 tons/h to be consistent with the permitted hours and throughputs for the other units in the No. 1 kiln system. The enclosed spreadsheet shows that this increase will not result in a significant net increase of either particulate matter or PM₁₀, and thus does not trigger PSD review. The ELSA forms have been completed using 8760 hours per year for these sources.

We have also corrected and updated several regulatory citations for applicable Florida rules. Except for an updated schedule for evaluating compliance issues related to fugitive emissions from the clinker reclaim (Document G) and a resigned compliance statement (Document H), the other enclosed documents are unchanged and are not being resubmitted.

For several sources, this application also requests changes to the testing frequency specified in PSD-FL-233 based on FAC 62-297.310(4) and the upcoming maximum achievable control technology (MACT) rule for Portland cement plants. For pollutants with allowable emissions greater than 100 tons/yr, this application generally reflects an annual compliance test pursuant to FAC 62-297.320(4). Because FAC 62-297 allows the DEP to establish other testing frequencies by permit, Southdown requests that if the initial compliance test for the kiln main stacks is less than 80 percent of the allowable emission limits for particulate matter, the Method 5 testing frequency for these sources be established at once every 5 years. This is consistent with the Method 5 testing frequency in the upcoming Portland cement MACT rule. Also, these stacks have continuous opacity monitors (COMs) that provide a continuous measure of particulate matter compliance. Method 9 opacity tests would be conducted on an annual basis. We believe these conditions would provide adequate assurance of compliance without the expense of an annual Method 5 test.

Because FAC 62-297.310(4) does not require an annual compliance test for SO₂ from the kiln stacks or particulate matter from the clinker cooler stacks (because potential emissions are less than 100 tons/yr for each pollutant), we are requesting a change in the testing frequency to once every 5 years as provided in the upcoming MACT rule.

For baghouse H3 (serving the cement silos for kiln No. 1, Unit 13) Southdown is requesting an allowable emission rate that is substantially more stringent than the limit in the current permit (AC 27-259945). The requested limits (2.22 lb/h and 9.7 tons/yr, compared to 36.05 lb/h and 157.9) are based on an estimated grain loading of 0.02 gr/dscf. These limits are being requested to avoid any obligation for an annual Method 5 test for this source. An annual Method 9 opacity test will, of course, be performed. This application reflects all of the requested changes discussed above.

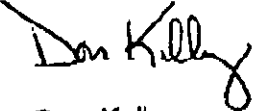
Finally, this application reflects the applicability of EPA's recently signed Compliance Assurance Monitoring (CAM) rule (40 CFR Part 64) to all of the sources controlled by baghouses at the plant. As provided in 40 CFR 64.5, however, no Part 70 permit submission is required until the Title V permit is renewed or significantly modified (as long as your office finds this application complete by mid-April 1998). Thus, this application does not have information specifically related to compliance with the CAM rule.

Dr. Richard D. Garrity

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October 20, 1997

If you have any questions or require further information, please call Matt Stone at (352) 796-7241.

Sincerely yours,



Don Kelly
Plant Manager

DKB/tlp

Enclosure

PARTICULATE EMISSION INCREASES FOR SOUTHDOWN-BROOKSVILLE

ARMS No	EPN No.	Baghouse ID No.	Source Description	Material	Flow Rate (acfm)	Temp. (F)	Grain Loading (gr/acft)	Flow Rate (Hscfm)	Actual Operating Hours (hrs/yr)	Requested Maximum Hours (hrs/yr)	Actual TSP Emissions (Ton/yr)	Allowable Potential TSP Emissions (Ton/yr)	Actual PM10 Emissions (Ton/yr)	Allowable PM10 Emissions (Ton/yr)	TSP Emissions Increase (Ton/yr)	PM10 Emissions Increase (Ton/yr)
012	EPN 12	G11	#2 Kiln Bleeding Silo	Raw Meal	11000	200	0.01	8900	8000	8780	3.77	4.89	3.21	4.13	1.09	0.93
018	EPN 16	L07	#3 Clinker Silo	Clinker	8500	185	0.01	6958	8000	8740	2.91	8.35	2.48	5.40	3.44	2.92
017	EPN 17	M09	Gypsum Hopper Transfer Belt	Gypsum	3000	150	0.01	2597	8790	8780	6.87	2.25	0.74	1.90	1.38	1.16
018	EPN 18	M10	#3 Finish Mill Dry Tank	Cement	8500	140	0.01	7480	8790	8780	2.47	8.35	2.10	5.40	3.80	3.30
019	EPN 19	N23	#3 Finish Mill	Cement	48000	200	0.01	36300	8790	8790	13.30	17.52	11.38	14.89	4.13	3.51
013	EPN 13	H13	#2 Kiln Feed	Raw Meal	6000	130	0.01	5169	8000	8740	2.08	4.47	1.75	3.80	2.41	2.03
008	EPN 08	F31	Clinker Silos 1 & 2	Clinker	15000	200	0.01	12000	8000	8790	3.14	8.35	4.37	5.40	1.21	1.03
TOTAL											30.62	48.14	26.03	40.92	17.82	14.85

NOTE:

ACTUAL EMISSIONS BASED ON ENGINEERING ESTIMATE OF GRAIN LOADING, FLOW RATE, AND TEMPERATURE AND ACTUAL OPERATING HOURS

PM10 ACTUAL EMISSIONS BASED ON A PM10 FRACTION OF TSP = 85%

ALLOWABLE/POTENTIAL EMISSIONS BASED ON HOURLY EMISSION LIMITS AND 8760 HOURS.
EMISSIONS INCREASE = ALLOWABLE - ACTUAL