

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 6, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ms. D. Anetha Lue, P.E.
Manager, Air Permitting
Southdown, Inc.
1200 Smith Street, Suite 2400
Houston, Texas 77002

Dear Ms. Lue:

Re: Request to Amend Construction Permit No. AC 27-186923
Cement Kiln #1

The Department has reviewed your letter and processing fee received August 10, 1992, requesting that the clinker product rate of the #1 cement kiln be deleted from a condition in the above referenced construction permit. Based on a review of the files regarding the #1 Cement Production Line and Handling System (CPLHS), the following information is pertinent:

- o On September 25, 1990, the Department received an application for a modification to fire Flolite in the #1 Cement Kiln. The proposed potential and subsequent allowable pollutant emissions (i.e., particulate matter and sulfur dioxide) were based on the proposed maximum 79.6 tons/hr clinker product rate and the AP-42 Emission Factors reference series for Cement Plants and Residual Oil-fired Sources (Tables 8.6-1 and 1.3-1, respectively).

On March 8, 1991, the Department issued a construction permit, No. AC 27-186923, for the modification and included federally enforceable conditions, related to the operation of the source, for reasonable assurance purposes. One such condition, Specific Condition No. 2, established a maximum allowable raw material feed rate into the #1 cement kiln of 130 tons/hr (wet basis) and the associated maximum clinker product rate of 79.6 tons/hr (dry basis).

- o On January 18, 1991, the Department received application packages for modifications of the #1 CPLHS's auxiliary sources (i.e., clinker cooler, raw mill, blending and storage silos, and clinker storage silos).

Ms. D. Anetha Lue

#1 Cement Kiln Amendment Request: AC 27-186923

October 6, 1992

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On December 13, 1991, the Department issued construction permits, Nos. AC 27-191611, -191612, -191615 and -191616, for the modification of the #1 CPLHS's auxiliary sources, referenced above, which included federally enforceable conditions for reasonable assurance purposes. In the permits for the #1 clinker cooler and clinker storage silos, the maximum allowable feed rate of clinker product was established at 84 tons/hr as a Specific Condition (#2 in both).

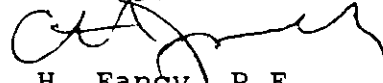
- o The #1 cement kiln is connected in series with the #1 clinker cooler, which is connected in series with the #1 clinker storage silos. Since it appears that the #1 CPLHS is not connected to the #2 CPLHS, except for the raw material feed into the raw mills, then the #1 clinker cooler and other #1 auxiliary sources do not receive clinker product without their #1 cement kiln operating.
- o It is apparent that there is an incompatibility between the the permitted operation capacities of the #1 cement kiln and its associated clinker storage silos (i.e., 79.9 vs. 84 tons/hr). As stated before, the operation of the #1 clinker cooler and the associated #1 clinker storage silos depend on the product output of the #1 cement kiln.
- o The manual, AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, EPA 450/4-90-003, bases the pollutant emission factors for "cement kilns-dry process" on "tons cement produced".

Since the product yield of the #1 cement kiln is the factor used in estimating the potential pollutant emissions for it and associated sources operating in series with it, the Department cannot justify deleting the federally enforceable condition establishing the allowable maximum clinker product of the #1 cement kiln. However, if an increase in the clinker product is desired, then an application for a modification shall be submitted along with the appropriate processing fee to the Department's Bureau of Air Regulation office.

Ms. D. Anetha Lue
#1 Cement Kiln Amendment Request: AC 27-186923
October 6, 1992
Page 3 of 3

If there are any questions, please call Bruce Mitchell at
(904)48-1344 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
C. Hetrick, HCBCC
D. Beason, Esq., DER

P 062 921 894



**Receipt for
Certified Mail**

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

PS Form 3800, June 1991

Sent to <i>Anetha Lee, PE</i>	
Street and No. <i>Southdown Ave</i>	
City, State, and ZIP Code <i>Houston, TX</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>10-6-92</i> <i>AC 27-186923</i>	



RECEIVED
DER - MAIL ROOM
1992 AUG 10 AM 11:38

August 6, 1992

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, FL 32399-2400

RE: Request for Permit Amendment, AC27-186923

Dear Mr. Fancy:

A processing fee of \$250 is enclosed for the Permit Amendment on Brooksville Cement Kiln #1. Please contact me if you have any questions at (713) 653-8056.

Sincerely,

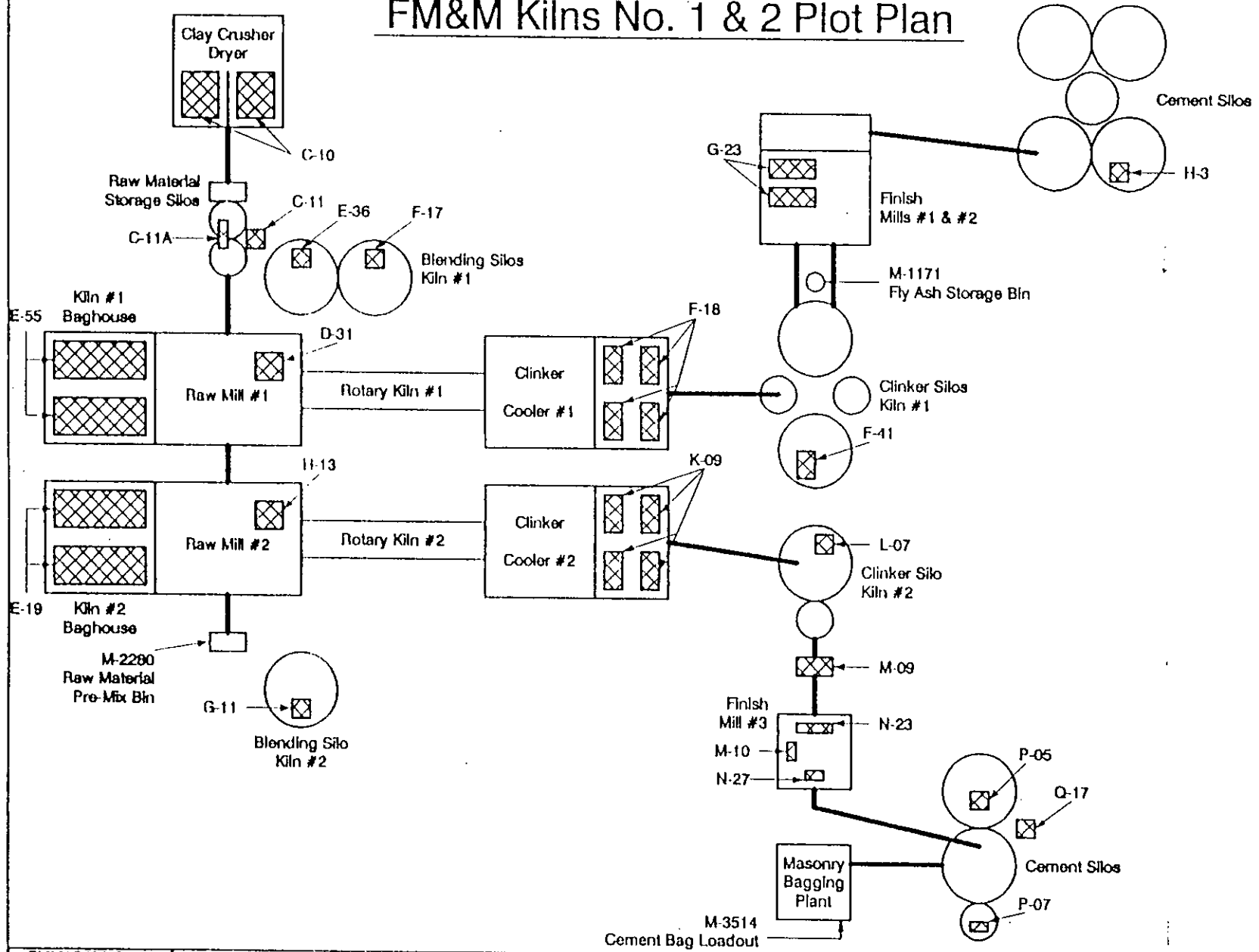
D. Anetha Lue, P.E.
Manager, Air Permitting

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DRAWN ON Pittsburgh National Bank JEANNETTE, PENNSYLVANIA IN COOPERATION WITH WELLS FARGO BANK, N.A. #4759-006604	SOUTHDOWN, INC. 1200 SMITH STREET, SUITE 2400 HOUSTON, TEXAS 77002	60-162 / 433						
		No. 038280						
<table border="1"> <thead> <tr> <th>DATE OF CHECK</th> <th>CHECK NO.</th> <th>AMOUNT OF CHECK</th> </tr> </thead> <tbody> <tr> <td>7 24 92</td> <td>38280</td> <td>*****250.00</td> </tr> </tbody> </table>			DATE OF CHECK	CHECK NO.	AMOUNT OF CHECK	7 24 92	38280	*****250.00
DATE OF CHECK	CHECK NO.	AMOUNT OF CHECK						
7 24 92	38280	*****250.00						
VOID AFTER 90 DAYS SOUTHDOWN, INC.								
PAY TO THE ORDER OF	FLORIDA DEPT OF ENVIRONMENTAL BUREAU OF AIR REGULATION TWIN TOWERS OFFICE BLDG 2600 BLAIR STONE ROAD TALLAHASSEE FL 32399-2400	 <hr/>						
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FM&M Kilns No. 1 & 2 Plot Plan

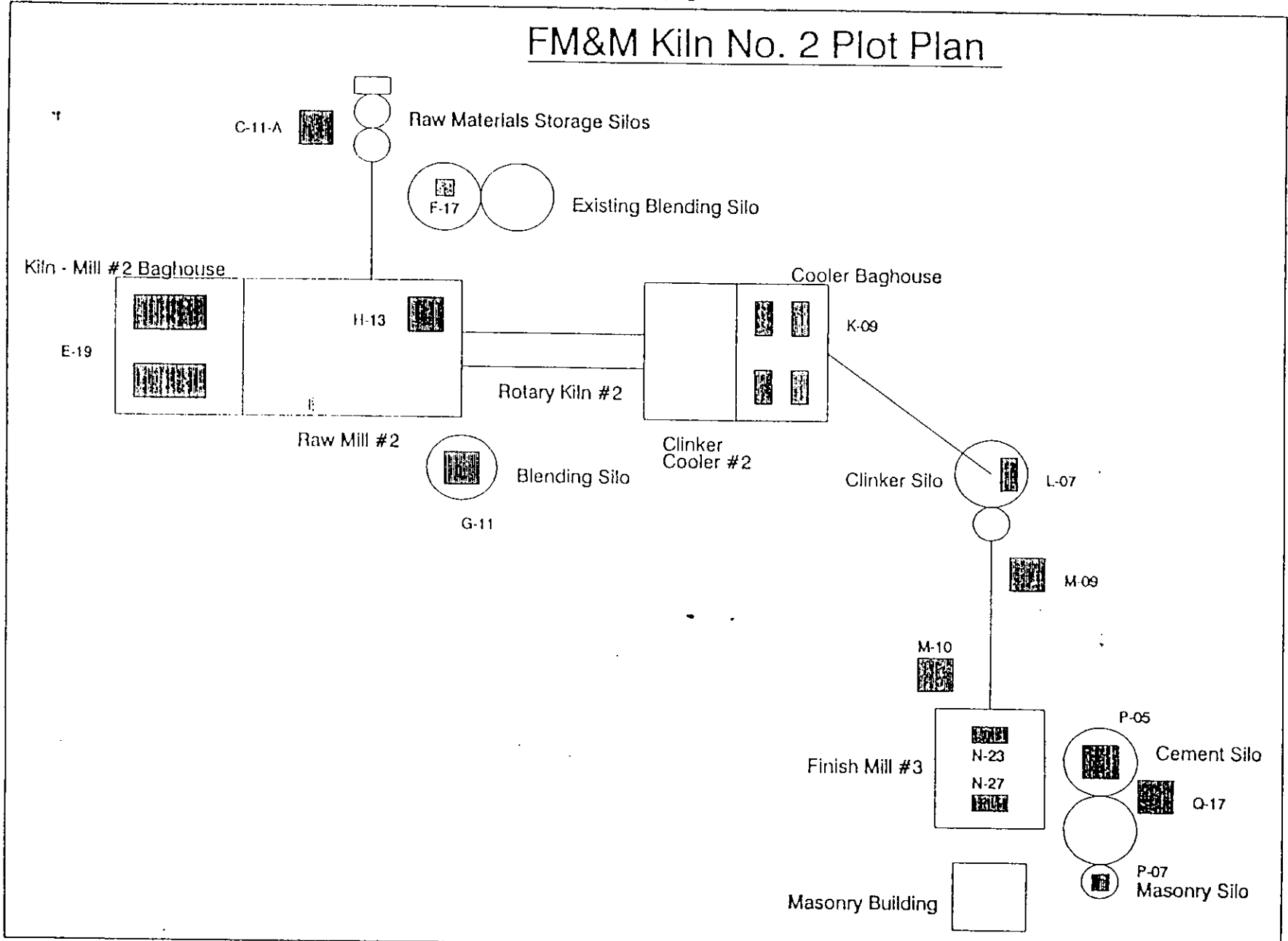


FMM1&2PL DRW

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Cross/Tessitore & Assoc., P.A.
Environmental Engineers Orlando, Florida

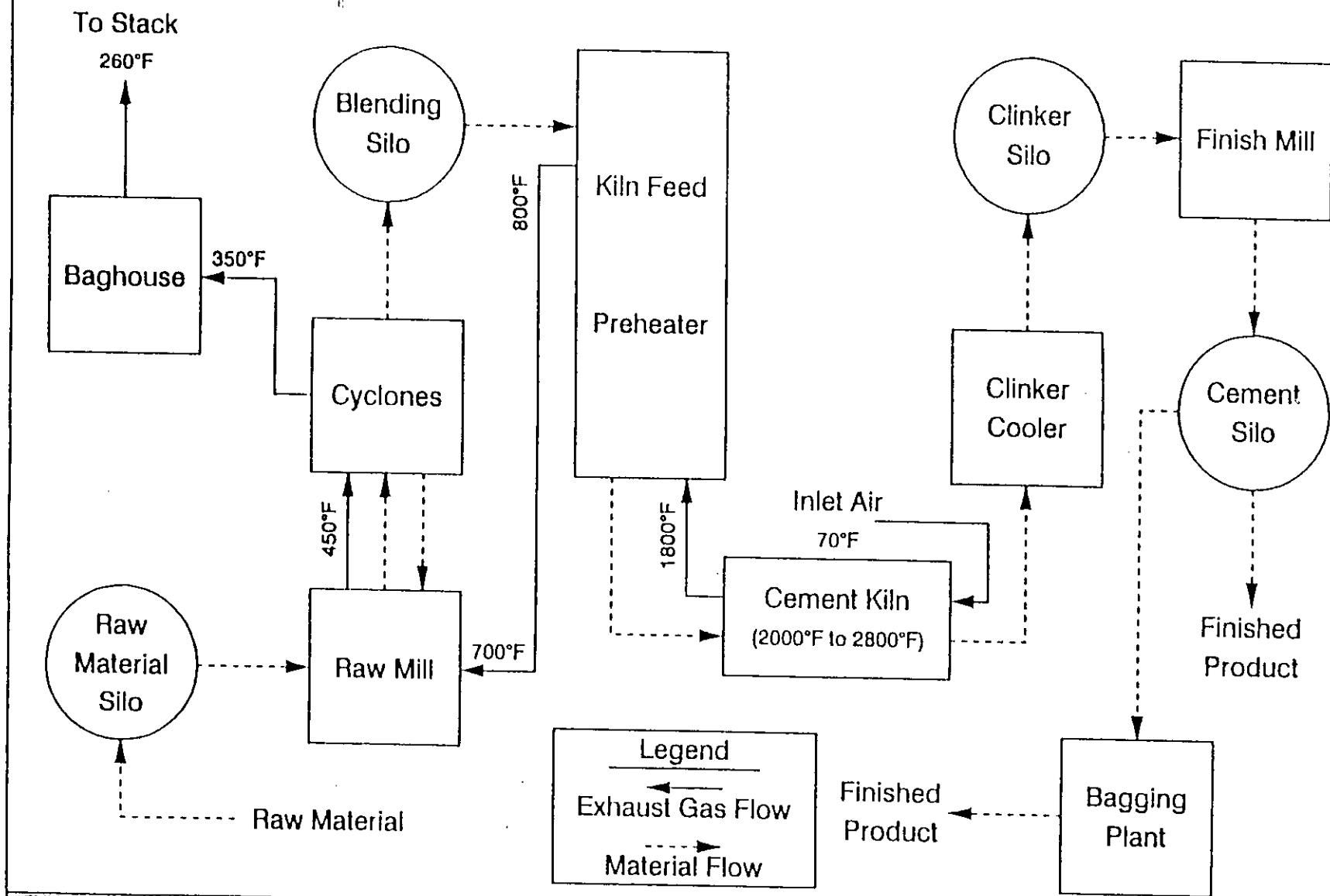
FIGURE V-6

FM&M Kiln No. 2 Plot Plan



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FM&M Kiln No. 1 Process Flow Diagram

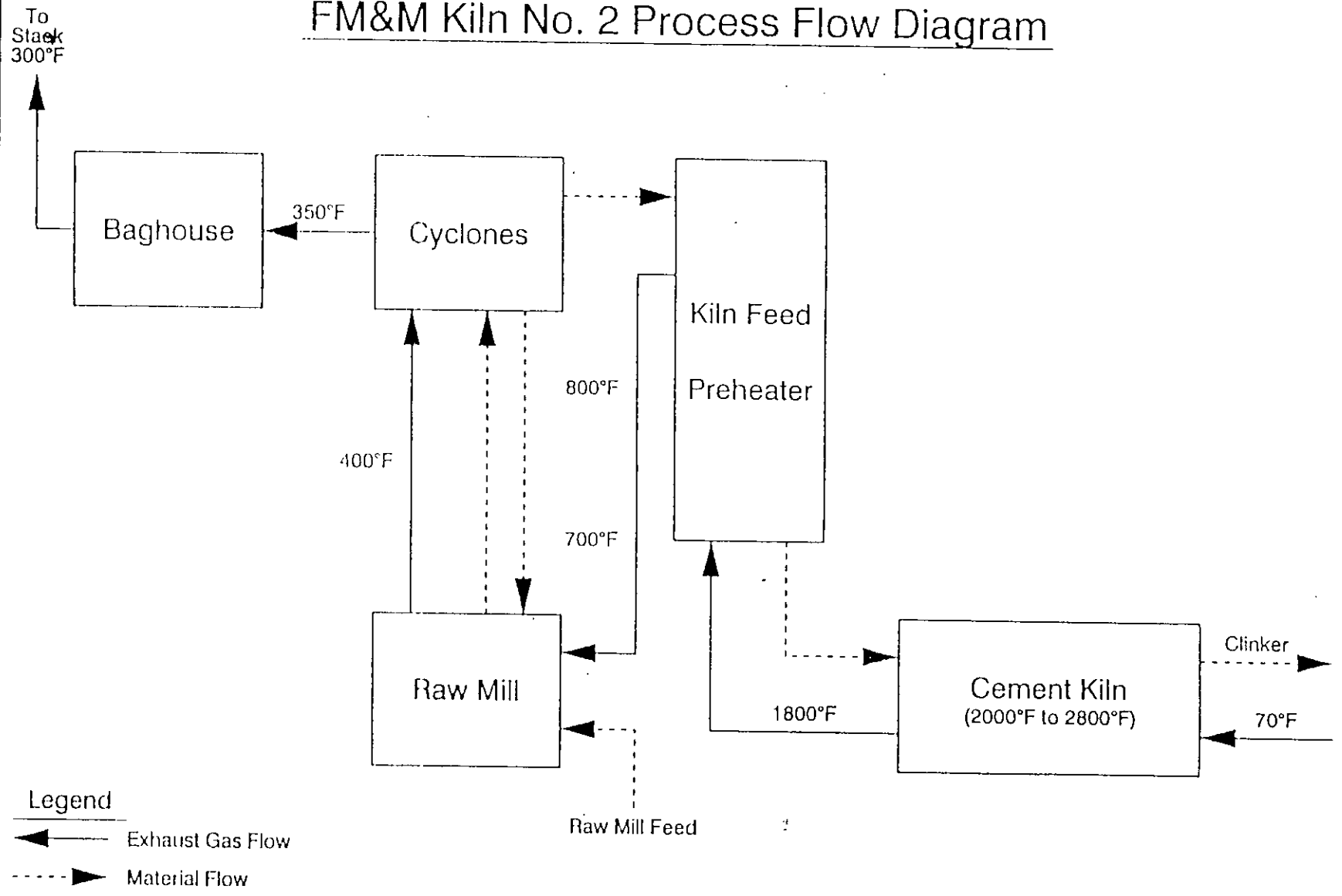


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Cross/Tessitore & Assoc., P.A.
 Environmental Engineers Orlando, Florida

Figure V-4
 FM&M Kiln No. 2 Process Flow Diagram



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Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 7, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED


D. Anetha Lue, P.E.
Manager, Air Permitting
Southdown, Inc.
1200 Smith Street, Suite 2400
Houston, TX 77002

Dear Ms. Lue:

RE: Florida Mining and Materials Brooksville Cement Kiln #1
Request for Permit Amendment, AC 27-186923

The Bureau of Air Regulation received your June 26, 1992, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$250 processing fee for permit amendments; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,


C. H. Fancy, P.E.
Chief

Bureau of Air Regulation

CHF/pa

cc: Bruce Mitchell

C. Hetrick, HCBCC 8-25-92 Pa

P 710 058 544



Certified Mail Receipt

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

PS Form 3800, June 1990

Sent to D. Anetha Lue, Southdown	
Street & No. 1200 Smith Street, Ste 2400	
P.O., State & ZIP Code Houston TX 77002	
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: 7-9-92 Permit: AC 27-186923	

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 next to the article number.

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:

D. Anetha Lue, P.E.
 Manager, Air Permitting
 Southdown, Inc.
 1200 Smith Street, Suite 2400
 Houston, TX 77002

4a. Article Number

P 710 058 544

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

JUL 13 1992

5. Signature (Addressee)

E. Glan

6. Signature (Agent)

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





RECEIVED

JUN 29 1992

Division of Air
Resources Management

RECEIVED

JUN 26 1992

June 26, 1992
Resource Management

Mr. C. H. Fancy
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Re: Florida Mining & Materials Brooksville Cement Kiln #1 -
Request for Permit Amendment, Permit No. A027-213207

Dear Mr. Fancy:

The operating permit for Florida Mining & Materials Kiln #1 was issued by Florida Department of Environmental Regulation on June 16, 1992. Southdown Inc. dba Florida Mining & Materials requests an amendment of Specific Condition No. 4 of this permit.

Specific Condition No. 4 presently states that the operation of the kiln shall be limited in the following manner-

"The Kiln No. 1 process feed rate shall not exceed 130 tons per hour, yielding a maximum clinker production rate of 79.6 tons per hour, averaged on a rolling 30-day production period. [Construction Permit No. AC27-186923]."
(emphasis added)

Southdown is requesting that the production rate be limited by the process feed rate to the kiln only, and that the additional requirement to limit production based on clinker production rate be deleted from the permit. Thus the amended permit would state that-

"The Kiln No. 1 process feed rate shall not exceed 130 tons per hour averaged on a rolling 30-day production period. [Construction Permit No. AC27-186923]."

This request is based on the fact that the production rate is limited by only one of these interdependent variables, and the fact that direct measurement of the process feed rate only is available.

Please note that the requested amendment will not alter the operation of the kiln in any way, and that this change will only serve to make the permit more applicable to the existing system.

Should it be necessary to amend the construction permit for this kiln (AC 27-186923) in order to effect the change, please proceed accordingly.

Please contact me at (713)650-8056 with any questions regarding this request. Thank you for your attention to this matter.

Sincerely,



D. Anetha Lue, P.E.
Manager, Air Permitting

cc: B. Mitchell
B. Thomas, SW Dist
C. Hettrick, HC BCC 2-25-92 PPH

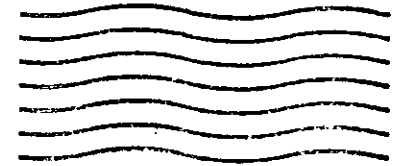
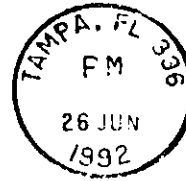
bcc: Jeet Gill
Don Kelly
Matt Stone



Brooksville Cement

A Southdown Company

P.O. Box 6 • Brooksville, Florida 34605-0006



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

