

CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812

RECEIVED
NOV 28 1990

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DER - BAQM November 26, 1990

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

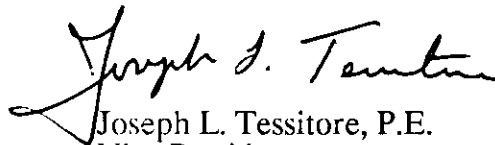
Subject: Florida Mining and Materials
Completeness Review of Application to Construct/Modify
AC27-186923 (No. 1 Kiln)
C/TA # F03.182

Dear Mr. Fancy:

Our initial response to the subject item on November 20, 1990, included Table 1, "Kiln No. 1 Calculated Potential Emissions Summary". In this table, the first compound is listed erroneously as Nitrogen Dioxide instead of Particulates. Attached is a revised Table 1 which should be substituted for the original table.

If you have any questions and/or require any additional data, please do not hesitate to call upon me.

Sincerely,


Joseph L. Tessitore, P.E.
Vice President

JLT/kp
Encl: a/s
cc: C.M. Coleman
C5522.Doc

TABLE 1
KILN NO. 1 CALCULATED POTENTIAL EMISSIONS SUMMARY

<u>Compound</u>	<u>Kiln Feed Rate (ton/hr)</u>	<u>Tested Emissions Rate (lb/hr)</u>	<u>Proposed Kiln Feed Rate (ton/hr)</u>	<u>Calculated Emissions Rate (lb/hr)</u>
Particulate	130.9	22.72	130	22.6
PM ₁₀	130.9	22.72	130	22.6
Sulfur Dioxide	125.5	2.24	130	2.3
Nitrogen Dioxide	119.6	355.04	130	385.9
Carbon Monoxide	121.6	56.80	130	60.7
Volatile Organic Compounds	125.5	8.80	130	9.1

CROSS/TESSITORE & ASSOCIATES, P.A.

4763 South Conway Road, Suite F.
Orlando, Florida 32812

Telephone: 407-851-1484

Fax#: 407-855-0369

C/TA PROJECT NUMBER: F03,182

URGENT FACSIMILE DOCUMENT

ATTN: MR. C.H. FANCY/MR. BRUCE MITCHELL FAX#: 904-922-6979

FROM: MR. JOSEPH TESSITORE FAX#: 407-855-0369

SUBJECT: FLORIDA MINING AND MATERIALS

DATE: NOVEMBER 26, 1990

NO. OF PAGES (INCLUDING THIS SHEET): 4 HARD COPY TO FOLLOW

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407/851-1454

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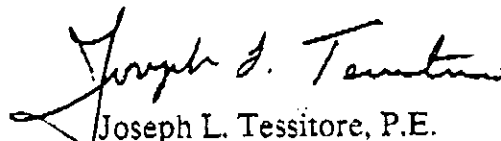
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Joseph L. Tessitore, P.E.
Vice President

JLT/kp
Encl: a/s
cc: C.M. Coleman
C5522.Doc

cc: B. Mitchell
E. Thomas, SW Dist.

REGISTERED PROFESSIONAL ENGINEERS

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REVISED TABLE

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ORIGINAL TABLE

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CROSS/TESSITORE & ASSOCIATES, P.A.

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November 20, 1990

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

Subject: Florida Mining and Materials
Completeness Review of Application to Construct/Modify
AC27-186923 (No. 1 Kiln)
C/TA # F03.182

Dear Mr. Fancy:

This submission is in response to your letter of October 23, 1990 regarding the Department's completeness review of Florida Mining and Materials' (FM&M) Application to Construct/Modify AC27-186923.

1. **Calculate the potential emissions of all pollutants (i.e., PM, PM₁₀, SO₂, NO_x, CO, VOC, etc.) expected to be emitted from the No. 1 kiln and based on new input rates of raw materials.**

The calculated potential emissions for the above pollutants from Kiln No. 1 at the increased feed rate, are presented in Table 1. It should be emphasized that Kiln No. 1 has not been required to test for PM₁₀, SO₂, NO_x, VOC and CO for compliance and the "Tested Emission Rates" presented in the table are based on very limited and preliminary testing. These results were obtained at various kiln feed rates, and the test results were adjusted to reflect emissions at the proposed 130 ton/hr feed rate.

2. **Referencing #1 above, calculate the potential pollutant emissions on each of the fuels (i.e., coal, fuel oil, and flolite) and at their maximum firing rates.**

The potential pollutant emission with the above fuels at their maximum firing rates, are not expected to be significantly different than those

presented in Table 1. Again, it must be emphasized that the Kiln No. 1 system was not required to be tested for the pollutants listed in Item 1 above for the various fuel firing modes, and therefore, complete data is not available. However; in order to obtain meaningful data, FM&M proposes to conduct performance testing of subject kiln. This performance testing would be based on the operating conditions and protocol, as presented in Table 2.

Table 2 shows that the kiln will be tested in three (3) operating modes as follows:

- A) Kiln Warm-up: Kiln No. 1 firing flolite to reach process temperature without process feed.
- B) Baseline Operation: Kiln No. 1 firing coal only at a process feed rate of ≥ 130 tons/hr.
- C) Temporary Operation: Kiln No. 1 firing coal and flolite at a process feed rate of ≥ 130 tons/hr. This condition is considered temporary and flolite is used simply to supplement the heat input when firing coal.

For each of the above operating modes, the kiln will be tested for PM, PM₁₀, SO₂, NO_x, CO, and VOC, as presented in Table 2.

3. What is the maximum input rate of raw materials in TPH-dry?

130 TPH.

4. What is the gas flow rate in dscfm?

196,176 dscfm.

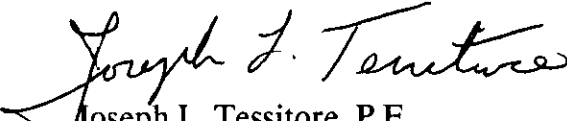
In conclusion, based on the lack of substantial testing data for Kiln No. 1 operating at the increased process feed rates and various fuel firing modes, the following is presented:

- 1) FM&M requests permission to conduct performance testing for the parameters, process feed rate, and fuel firing modes, as presented in Table 2.
- 2) Upon receipt of permission for the above, FM&M will submit a detailed testing protocol for FDER approval.
- 3) Upon approval, the testing will be conducted and results will be submitted to FDER for evaluation.

- 4) Based on testing results, FM&M will request an operating permit allowing the use of flolite and increased kiln process feed rate consistent with the above testing results.

If you have any questions and require any additional data, please do not hesitate to call upon me.

Sincerely,


Joseph L. Tessitore, P.E.
Vice President

JLT/kp
Encl: a/s
cc: C.M. Coleman
C5522.Doc

B. Mitchell
B. Thomas, SW Dist



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4763 S. CONWAY ROAD, SUITE F
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Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

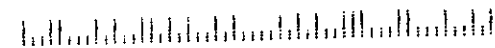


TABLE 1
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Carbon Monoxide	121.6	56.80	130	60.7
Volatile Organic Compounds	125.5	8.80	130	9.1

TABLE 2
PROPOSED PERFORMANCE TEST MATRIX

TEST CONDITIONS

<u>Case</u>	<u>Operating Mode</u>	<u>Kiln Feed Rate T/Hr</u>	<u>Fuel Firing Rates mmBtu/hr</u>		
			<u>Flolite</u>	<u>No. 2 Fuel Oil</u>	<u>Coal</u>
1*	Kiln Warm-up	0	300	0	0
2	Baseline Operation	130	0	0	300
3*	Temporary Operation	130	60	0	240

TEST PARAMETERS

PM₁₀

Particulate (pm)

Sulfur Dioxide (SO₂)

Nitrogen Dioxide (NO_x)

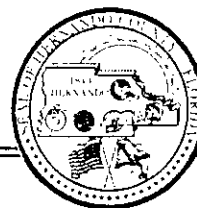
Carbon Monoxide (CO)

Volatile Organic Compounds (VOC)

* Cases 1 and 3 combined are limited to 250 hours per year.

Board of County Commissioners

Hernando County



20 North Main Street, Room 460
Brooksville, FL 34601

November 1, 1990

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NOV 13 1990
DER - BAQM
(904)-754-4000
(904)-754-4002

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

Dear Mr. Fancy:

Mr. Segundo Fernandez of Oertel, Hoffman, Fernandez & Cole, P.A. is acting as the County's representative for air sources in Hernando County as related to Florida Mining and Materials and Florida Crushed Stone. Mr. Fernandez' firm will review all permitting documents to ensure that the County's interests are protected. Please forward all correspondence relating to these facilities to the attention of Mr. Segundo Fernandez, P.A. at the following address:

Oertel, Hoffman, Fernandez, and Cole, P.A.
2700 Blair Stone Road
Post Office Box 6507
Tallahassee, FL 32314-6507

Mr. Bruce Mitchell of your staff indicated that DER is required to copy the County but is not required to copy the County's legal representative. The County is requesting that you forward the County's official notification to Mr. Fernandez.

If you should need any additional information, please contact me.

Sincerely,

Hernando County Board of
County Commissioners

Henry D. Ledbetter
Chairman

KPL/mre

cc: Richard Garrity, DER (Tampa Office)
Charles B. Hetrick, County Administrator
R. Bruce Snow, County Attorney
Segundo Fernandez, P.A., OHF&C
Larry Jennings, Planning Department Manager

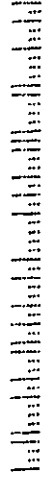
B. Mitchell
J. Reynolds
OHF/BA

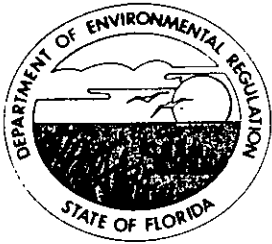
Board of County Commissioners
Hernando County

20 North Main Street, Room 460
Brooksville, Florida 34601



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





Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

October 23, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Henry E. Andre - Vice President
Florida Mining and Materials
Post Office Box 6
Brooksville, Florida 34605-0006

Dear Mr. Andre:

Re: Completeness Review of Application to Construct/Modify
AC 27-186923

The Department has reviewed the above referenced application package received September 25, 1990, which requests a modification of the existing facility. Based on a technical review of the application package, it is deemed incomplete. Please submit to the Department's Bureau of Air Regulation the following information, including all reference material, assumptions and calculations, and the status will, again, be ascertained:

1. Calculate the potential emissions of all pollutants (i.e., PM, PM₁₀, SO₂, NO_x, CO, VOC, etc.) expected to be emitted from the No.1 kiln and based on new input rates of raw materials.
2. Referencing #1 above, calculate the potential pollutant emissions on each of the fuels (i.e., coal, fuel oil, and flolite) and at their maximum firing rates.
3. What is the maximum input rate of raw materials in TPH-dry?
4. What is the gas flow rate in dscfm?

If there are any questions, please call Bruce Mitchell at 904-488-1344 or write to me at the above address.

Sincerely,

Barry D. Anderson
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/plm

c: B. Thomas, SW Dist.
J. Tessitore, CIT & A
K. Liles, HC

P 256 396 216

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

Sent to Mr. Henry E. Andre, FM&M	
Street and No. P. O. Box 6	
P.O., State and ZIP Code Brooksville, FL 34605-0006	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 10-23-90 Permit: AC 27-186923	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to: Mr. Henry E. Andre - Vice Pres. Florida Mining and Materials P. O. Box 6 Brooksville, FL 34605-0006</p>	<p>4. Article Number P 256 396 216</p> <p>Type of Service: <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</p> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>.</p>
<p>5. Signature - Addressee X <i>S. Adam Schuman</i></p> <p>6. Signature - Agent X</p> <p>7. Date of Delivery 10-25-90</p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>