

Department of Condy Plo read Environmental Protection & Condy Plo read plan progress

Jeb Bush Governor

Southwest District 13051 North Telecom Parking,
Temple Terrace, Florida 33637-0926

December 23, 2005

Colleen M. Castille Secretary

Mr. Michael Gonzales CEMEX Cement, Inc.

JAN 05 2006

P.O. Box 6 Brooksville, Florida 34605

BUREAU OF AIR REGULATION

Dear Mr. Gonzales:

Re: Request for Additional Information (RAI)

Air Construction Permit Application for Clay Shredder System and Concurrent Title V Air Operation Permit Revision (DEP Project Nos.: 1050010-020-AC and 1050010-021-AV)

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On November 23, 2005, the Department received your construction permit application for the construction of a clay shredder and associated fly ash storage and handling equip at your cement manufacturing facility located in Brooksville, Hernando County. The application also requested concurrent processing of a Title V operation permit revision to incorporate the clay shredder system. In order to continue processing the application, the Department will need the following additional information pursuant to Rule 62-4.055(1), F.A.C.

1. Request for Concurrent Title V Revision (Project 021-AV) - Since the clay shredder system has not been built or tested for visible emissions, it cannot be included on the Title V operation permit without a compliance plan that addresses the construction, initial operation and testing of this project in accordance with the following requirement ((underlining added) taken from the DEP Form No. 62-210.900(1) instructions for Section C. (Facility Additional Information - Additional Requirements for Title V Air Operation Permit Applications, Item 3, on page 12 of your application):

Compliance Report and Plan - Provide a report indicating the compliance status of each emissions unit addressed in this application for air permit with respect to each applicable requirement and, for any instance of noncompliance, provide a description of the actions that will be taken to achieve compliance, including a compliance schedule with enforceable milestones. The compliance plan must be at least as stringent as that contained in any judicial consent decree or administrative order to which the Title V source is subject and provide for submission of certified progress reports no less frequently than quarterly.

Note: A compliance report is required for all initial, revision, and renewal Title V air operation permit applications. A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

If you wish to continue with concurrent processing of a Title V revision please submit a compliance plan that meets all of the above requirements. Alternatively you can withdraw the concurrent Title V revision request and resubmit it after the clay shredder system has been constructed, operated and tested in accordance with a final air construction permit.

- 2. <u>Current Use and Handling of Clay (Project 020-AC)</u> Is clay currently being used as a raw material in the kiln mix and if so how is it currently being fed into the process in the absence of this clay shredder? Is all of the equipment Shown on Figure 1 in Attachment A new equipment (except for that specifically noted as Existing) not currently in use at the facility?
- 3. <u>Process Weight Rule Applicability (Project 020-AC)</u> Does the shredder itself have a specific vent or stack emission point, or (as the application implies) are particulate matter emissions from the shredder fugitive in nature?

If the shredder has no specific vent or stack, then in accordance with Rule 62-296.320(4)(a)2., F.A.C., the Process Weight Table PM emission standard (referenced on page 22 of your application) does not apply.

If there is a stack or vent on the shredder, then the Process Weight Table rule would apply and the resulting PM/PM10 limitation of 40.14 lbs/hr and 24.9 TPY, in conjunction with the PM/PM10 emissions from the fly ash dust collector and fugitive emissions from fly ash delivery truck traffic (if applicable), material handling conveyors, and other associated equipment, would result in a PM/PM10 potential to emit (PTE) over the PSD significant levels of 15 TPY of PM10 and 25 TPY of PM, thereby requiring a PSD permit application. To avoid this, you could request a PM/PM10 limitation well below the Process Rate Table limit of 40.14 lbs/hour. This could also remove the necessity of requesting an operating hours limitation of 5,840 hours/yr, with the associated recordkeeping requirements.

- 4. <u>Fly Ash Delivery (Project 020-AC)</u> How will the fly ash to be stored in the fly ash storage silos ("pigs") be delivered to the facility, and transferred into the silos?
- 5. <u>Final Mix (Project 020-AC)</u> What will be the moisture content of the final clay/fly ash mix? Will the belt conveyor that transfers this material to the cement facility hopper be enclosed or covered?
- 6. <u>Potential PM/PM10 Emission Calculations (Table 1 in Appendix A to the application)</u>Please specify which source type was used to obtain the emission factor for Clay
 Shredding from AP-42 Table 11.19.2-2, and explain why this is an appropriate factor
 to estimate PM/PM10 emission from this operation. Please also show how the factor

used in the calculations was adjusted from the AP-42 factor based on the 91% reduction to take into account increased moisture content of clay. Please review the calculation for Process Fugitive Sources. It appears that the tripling adjustment to account for there being three sources of fugitive emissions may have been done twice - one in tripling the lb/hour emission factor (200 x 0.00026 x 3 = 0.156 lb/hr PM) and again in calculating tons/year (0.156 x 5,840 hrs/yr x 1/2000 lbs/ton = 0.4555 TPY x 3 = 1.367 TPY PM). Please correct the calculations if needed.

Rule 62-4.050 F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result, your response to the above requests should be certified by a professional engineer just as the original application was.

"Notice (for Project 020-AC): Pursuant to the provisions of Section 120.600, F.S. and Subsection 62-12.070(5), F.A.C., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available."

(For Project 021-AV) The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6, F.A.C.

If you have any questions on this request, please call me at (813) 632-7600 extension 118 or via email at david.zell@dep.state.fl.us.

Sincerely

David Zell

Air Permitting Engineer Southwest District Office

DRZ/

copies to:

- Neil A. Lofgren, P.E., Koogler & Associates
- LATLinero, FDEP, DARM, Bureau of Air Regulation