



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. Current Use and Handling of Clay (Project 020-AC) - 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. Process Weight Rule Applicability (Project 020-AC) - 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. Fly Ash Delivery (Project 020-AC) - 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. Final Mix (Project 020-AC) - 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. Potential PM/PM10 Emission Calculations (Table 1 in Appendix A to the application)- 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 ( $200 \times 0.00026 \times 3 = 0.156$  lb/hr PM) and again in calculating tons/year ( $0.156 \times 5,840$  hrs/yr  $\times 1/2000$  lbs/ton = 0.4555 TPY  $\times 3 = 1.367$  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.

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"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
- ~~LAT~~ Linero, FDEP, DARM, Bureau of Air Regulation