

INTEROFFICE MEMORANDUM

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TO: Clair Fancy

FROM: Ed Palagyi *EP*

DATE: February 17, 1983

SUBJ: Letter from Florida Mining & Mining Materials Corporation  
requesting change in permit conditions.

The following are my comments to Mr. Rhineberger's letter dated January 13, 1983.

In Section 111-C of the construction application (AC 27-30449) for the clinker cooler the applicant requested a particulate emission limit of 7.1 pounds per hour. The requested emission rate is more stringent than the 12 pounds per hour allowed by NSPS. Since the data indicated the requested emission rate was attainable using the proposed control device, the department saw no reason not to grant the requested lower emission limit.

However, in retrospect, the applicant had requested the NSPS particulate standard of 0.1 pound per ton of kiln feed, but, instead used the clinker cooler feed rate of 71 tons per hour in determining the emission rate. I think this 71 ton figure should have been 73.5 tons which I base on the assumption that all the kiln product discharges to the clinker cooler. Whichever feed rate is correct is inconsequential since the NSPS emission factor for the clinker cooler is based on the kiln feed rate, which is 120 TPH.

Or, in a nutshell, the department granted the clinker cooler particulate emission rate requested by the applicant.

The Permitted No. 2 kiln particulate emission limit was based on a BACT determination. The applicant in his application (AC 27-30450) had requested the NSPS emission of 0.3 pounds particulate matter per ton kiln feed, or 36 pounds per hour. I see no reason why the permitted rate of 24 pounds PM per hour would not be attainable using the proposed control device.

Lets explore the competitive advantage argument. First, the control device efficiencies required: To achieve the particulate emission rate of 24 lb/hr and 36 lb/hr from No. 2 kiln would require a control device efficiency of 99.9602% and 99.9404%, a difference of 0.0198%. To achieve the particulate emission rate of 7.1 lb/hr and 12 lb/hr from the clinker cooler would require a control device efficiency of 99.9455% and 99.9078%, a difference of 0.0377%. I do not believe the cost of a control device would

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be increased or decreased based on difference in the efficiency required. In either case, maintainance and operating cost would be the same. The facility is scheduled to be completed in 1983, I would assume the control devices have already been purchased.

The material collected in the control device is returned to the process. This equates to an additional 45 TPY of recycle from the kiln and 19 TPY from the clinker cooler. This is based upon the difference between permitted and NSPS particulate emission rates.

Since net return is based upon the amount of product sold, I would say that Florida Mining & Material Corporation has the competitive advantage. I would be interested in receiving a copy of the cost analysis upon which Mr. Rhineberger based his conclusion.

The opacity standard for the kiln, clinker cooler and Raw Mill are more stringent for Florida Crushed Stone. The difference between 0% and <5% opacity for the other sources requires no further comment.

I would also mention that if the State permits were changed, the Federal permit, PSD-FL-063, would still apply. The emission limits are the same, so changing the State permit would still subject the facility to the Federal emission limits, so making any changes to the State permits would not change the source emission limits.