



United States Department of the Interior  
FISH AND WILDLIFE SERVICE



IN REPLY REFER TO:

MAILING ADDRESS:  
Post Office Box 25486  
Denver Federal Center  
Denver, Colorado 80225

STREET LOCATION:  
134 Union Blvd.  
Lakewood, Colorado 80228

RW Air Quality  
Mail Stop 60130

MAY 24 1991

RECEIVED

MAY 30 1991

Mr. C.H. Fancy, P.E., Deputy Chief  
Bureau of Air Quality Management  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Division of Air  
Resources Management

Dear Mr. Fancy:


We have reviewed the information that you forwarded to us regarding Florida Mining and Materials' (FM&M) request to conduct performance tests while burning Tire Derived Fuel (TDF) and/or used oil with coal in Kilns 1 and 2 at their Brooksville, Florida, cement plant. The FM&M facility is located approximately 25 km southeast of the Chassahowitzka Wilderness Area, a class I air quality area administered by the U.S. Fish and Wildlife Service.

Florida Mining and Materials expects that actual pollutant emissions would not increase as a result of firing these fuel mixtures. We are pleased to see that the conditions you specified for the proposed performance tests are very extensive and complete. If the performance tests confirm FM&M's assertion that actual emissions of the listed pollutants would not increase, then we would not object to the firing of these fuels in the kilns on a continuous basis. However, given the proximity of the Chassahowitzka Wilderness Area and the toxic nature of the pollutants to be tested (i.e., heavy metals, dioxins, furans, benzene, polynuclear aromatic hydrocarbons, etc.), we would be concerned about potential impacts on sensitive resources at the wilderness area if the emissions of these pollutants would increase. Consequently, if the performance tests show that emissions would increase as a result of firing TDF and used oil in the kilns, FM&M should perform a thorough assessment of the potential effects of the emission increases on resources at the wilderness area. We ask that you then provide us ample opportunity to review this assessment to determine if such impacts would be adverse, before you permit FM&M to burn these fuels continuously.

We understand that Florida Crushed Stone (FCS) has also requested a permit amendment to allow burning of TDF in a kiln at their Brooksville cement plant. If the emissions of toxic pollutants would increase as a result of FCS burning TDF, we would have the same concerns as those discussed above for the FM&M proposal.

We appreciate you keeping us informed about permitting activities that could impact our resources. We will await the results of the FM&M performance tests. In the meantime, if you have any questions regarding this matter, please contact John Bunyak of our Air Quality Office at (303) 969-2071.

Sincerely,



Wilbur N. Ladd, Jr.  
Assistant Regional Director  
Refuges and Wildlife, Region 6

cc: B. Mitchell  
B. Thorners, SW Dist.  
C. Detrick, HCBCC  
C. Coleman, FM&M  
Q. Jessitore, CT/A  
P. Cunningham, HBB&S  
N. Stone FCS  
A. Koogler, R&A  
J. Sellers, H&K  
CHF/BA