



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 6, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ms. D. Anetha Lue, P.E.
Manager, Air Permitting
Southdown, Inc.
1200 Smith Street, Suite 2400
Houston, Texas 77002

Dear Ms. Lue:

Re: Request to Amend Construction Permit No. AC 27-186923
Cement Kiln #1

The Department has reviewed your letter and processing fee received August 10, 1992, requesting that the clinker product rate of the #1 cement kiln be deleted from a condition in the above referenced construction permit. Based on a review of the files regarding the #1 Cement Production Line and Handling System (CPLHS), the following information is pertinent:

- o On September 25, 1990, the Department received an application for a modification to fire Flolite in the #1 Cement Kiln. The proposed potential and subsequent allowable pollutant emissions (i.e., particulate matter and sulfur dioxide) were based on the proposed maximum 79.6 tons/hr clinker product rate and the AP-42 Emission Factors reference series for Cement Plants and Residual Oil-fired Sources (Tables 8.6-1 and 1.3-1, respectively).

On March 8, 1991, the Department issued a construction permit, No. AC 27-186923, for the modification and included federally enforceable conditions, related to the operation of the source, for reasonable assurance purposes. One such condition, Specific Condition No. 2, established a maximum allowable raw material feed rate into the #1 cement kiln of 130 tons/hr (wet basis) and the associated maximum clinker product rate of 79.6 tons/hr (dry basis).

- o On January 18, 1991, the Department received application packages for modifications of the #1 CPLHS's auxiliary sources (i.e., clinker cooler, raw mill, blending and storage silos, and clinker storage silos).

Ms. D. Anetha Lue

#1 Cement Kiln Amendment Request: AC 27-186923

October 6, 1992

Page 2 of 3

On December 13, 1991, the Department issued construction permits, Nos. AC 27-191611, -191612, -191615 and -191616, for the modification of the #1 CPLHS's auxiliary sources, referenced above, which included federally enforceable conditions for reasonable assurance purposes. In the permits for the #1 clinker cooler and clinker storage silos, the maximum allowable feed rate of clinker product was established at 84 tons/hr as a Specific Condition (#2 in both).

- o The #1 cement kiln is connected in series with the #1 clinker cooler, which is connected in series with the #1 clinker storage silos. Since it appears that the #1 CPLHS is not connected to the #2 CPLHS, except for the raw material feed into the raw mills, then the #1 clinker cooler and other #1 auxiliary sources do not receive clinker product without their #1 cement kiln operating.
- o It is apparent that there is an incompatibility between the the permitted operation capacities of the #1 cement kiln and its associated clinker storage silos (i.e., 79.9 vs. 84 tons/hr). As stated before, the operation of the #1 clinker cooler and the associated #1 clinker storage silos depend on the product output of the #1 cement kiln.
- o The manual, AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants, EPA 450/4-90-003, bases the pollutant emission factors for "cement kilns-dry process" on "tons cement produced".

Since the product yield of the #1 cement kiln is the factor used in estimating the potential pollutant emissions for it and associated sources operating in series with it, the Department cannot justify deleting the federally enforceable condition establishing the allowable maximum clinker product of the #1 cement kiln. However, if an increase in the clinker product is desired, then an application for a modification shall be submitted along with the appropriate processing fee to the Department's Bureau of Air Regulation office.

Ms. D. Anetha Lue

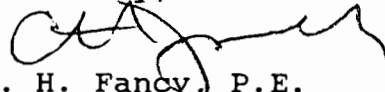
#1 Cement Kiln Amendment Request: AC 27-186923

October 6, 1992

Page 3 of 3

If there are any questions, please call Bruce Mitchell at (904)48-1344 or write to me at the above address.

Sincerely,



C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/BM/rbm

Attachments

cc: B. Thomas, SWD
C. Hetrick, HCBCC
D. Beason, Esq., DER

P 062 921 894

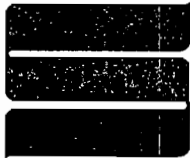


Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to <i>Anetha Lee, PE</i>	
Street and no. <i>Southdown Ave</i>	
City, State, and ZIP Code <i>Houston, TX</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>10-6-92</i>	
<i>AC 27-186923</i>	

PS Form 3800, June 1991



RECEIVED
DER - MAIL ROOM
1992 AUG 10 AM 11:38

August 6, 1992

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

RE: Request for Permit Amendment, AC27-186923

Dear Mr. Fancy:

A processing fee of \$250 is enclosed for the Permit Amendment on Brooksville Cement Kiln #1. Please contact me if you have any questions at (713) 653-8056.

Sincerely,

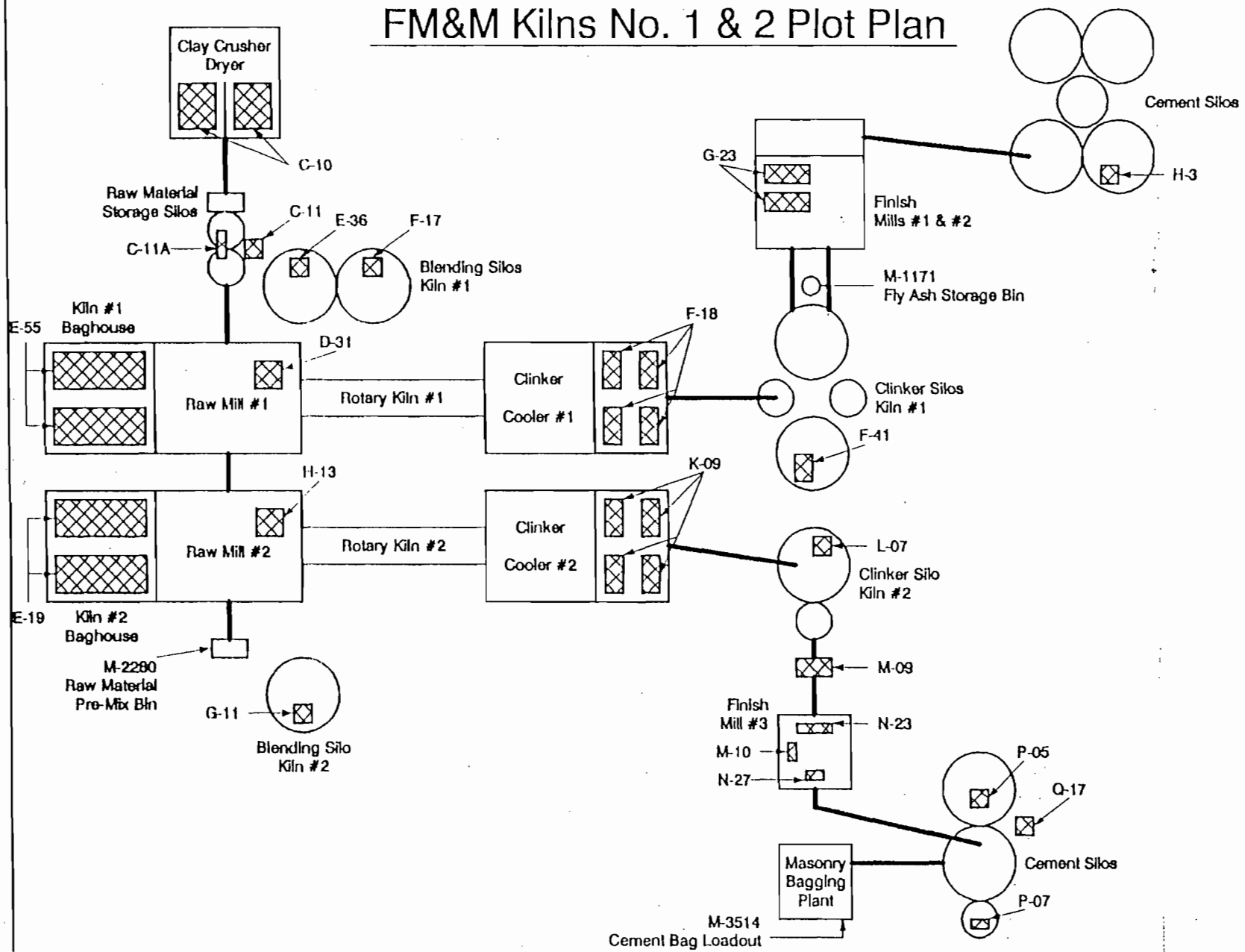
D. Anetha Lue, P.E.
Manager, Air Permitting

DAL:tds

AL108AL0000.LTR

DRAWN ON Pittsburgh National Bank JEANNETTE, PENNSYLVANIA IN COOPERATION WITH WELLS FARGO BANK, N.A. #4759-006604		SOUTHDOWN, INC. 1200 SMITH STREET, SUITE 2400 HOUSTON, TEXAS 77002		60-162 / 433
		No. 038280		
PAY TO THE ORDER OF		DATE OF CHECK	CHECK NO.	AMOUNT OF CHECK
FLORIDA DEPT OF ENVIRONMENTAL BUREAU OF AIR REGULATION TWIN TOWERS OFFICE BLDG 2600 BLAIR STONE ROAD TALLAHASSEE FL 32399-2400		7 24 92	38280	*****250.00
		VOID AFTER 90 DAYS SOUTHDOWN, INC.		

FM&M Kilns No. 1 & 2 Plot Plan



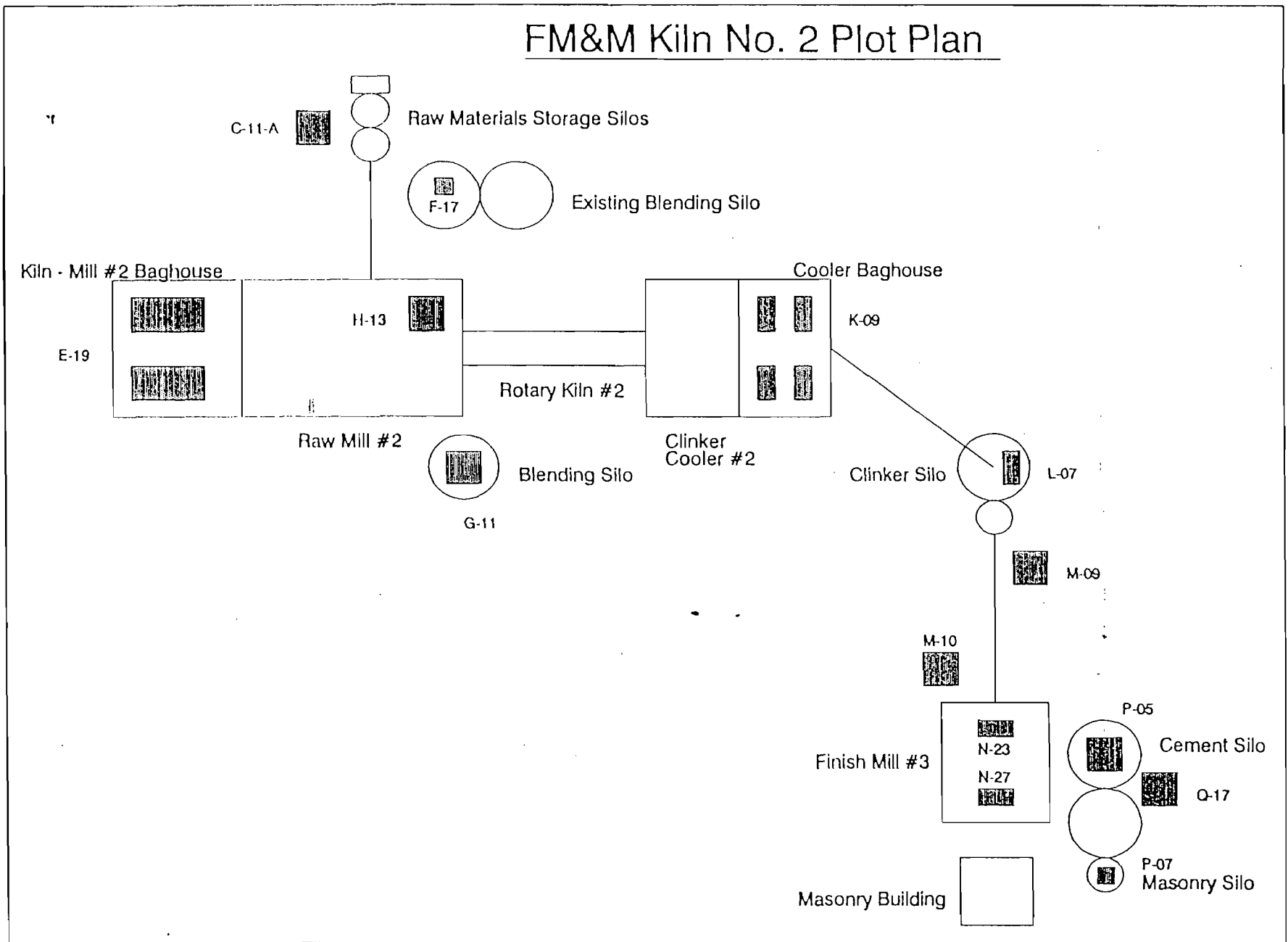
FMM1&2PL.DRW

C
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Cross/Tessitore & Assoc., P.A.
Environmental Engineers Orlando, Florida

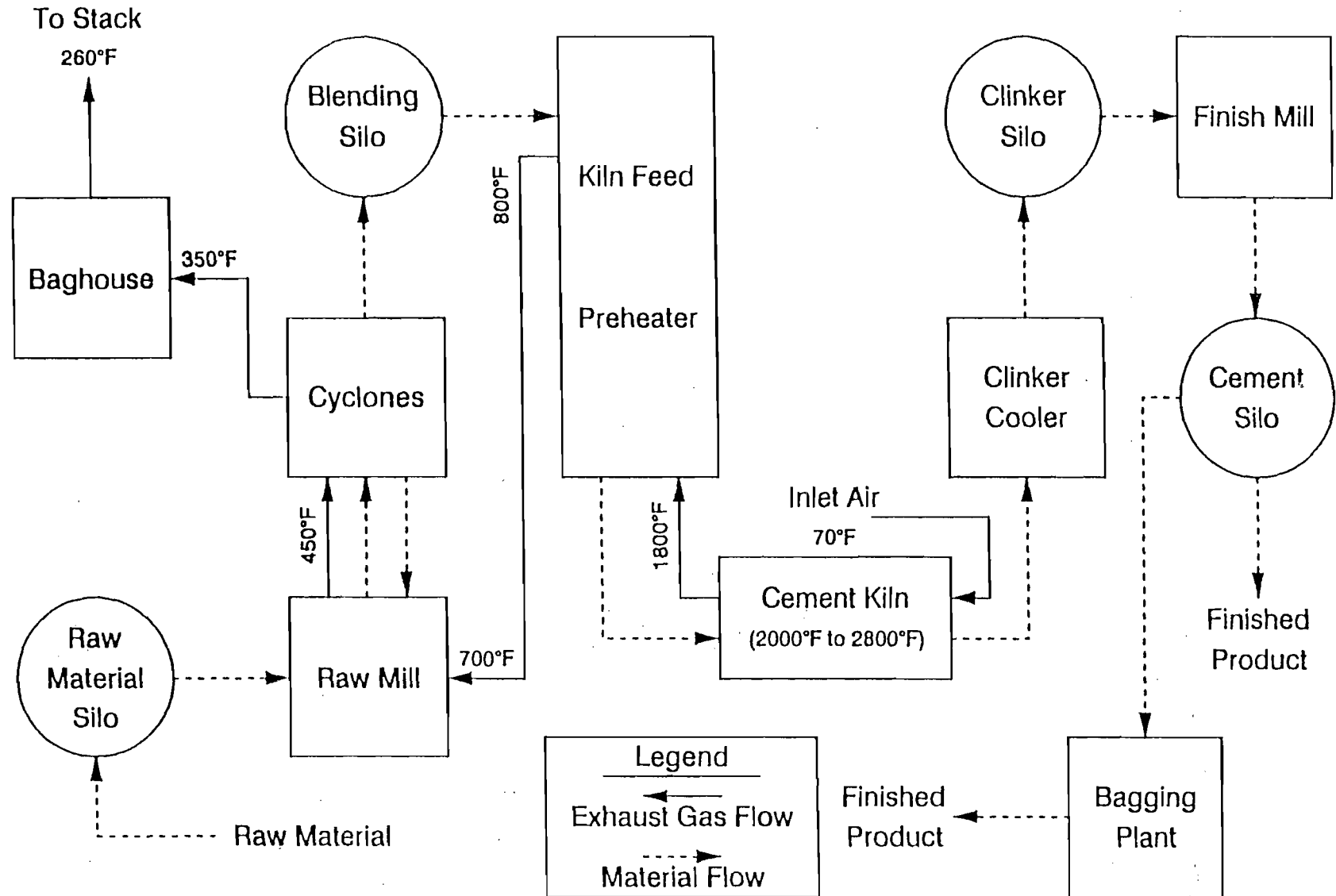
FIGURE V-6

FM&M Kiln No. 2 Plot Plan



54

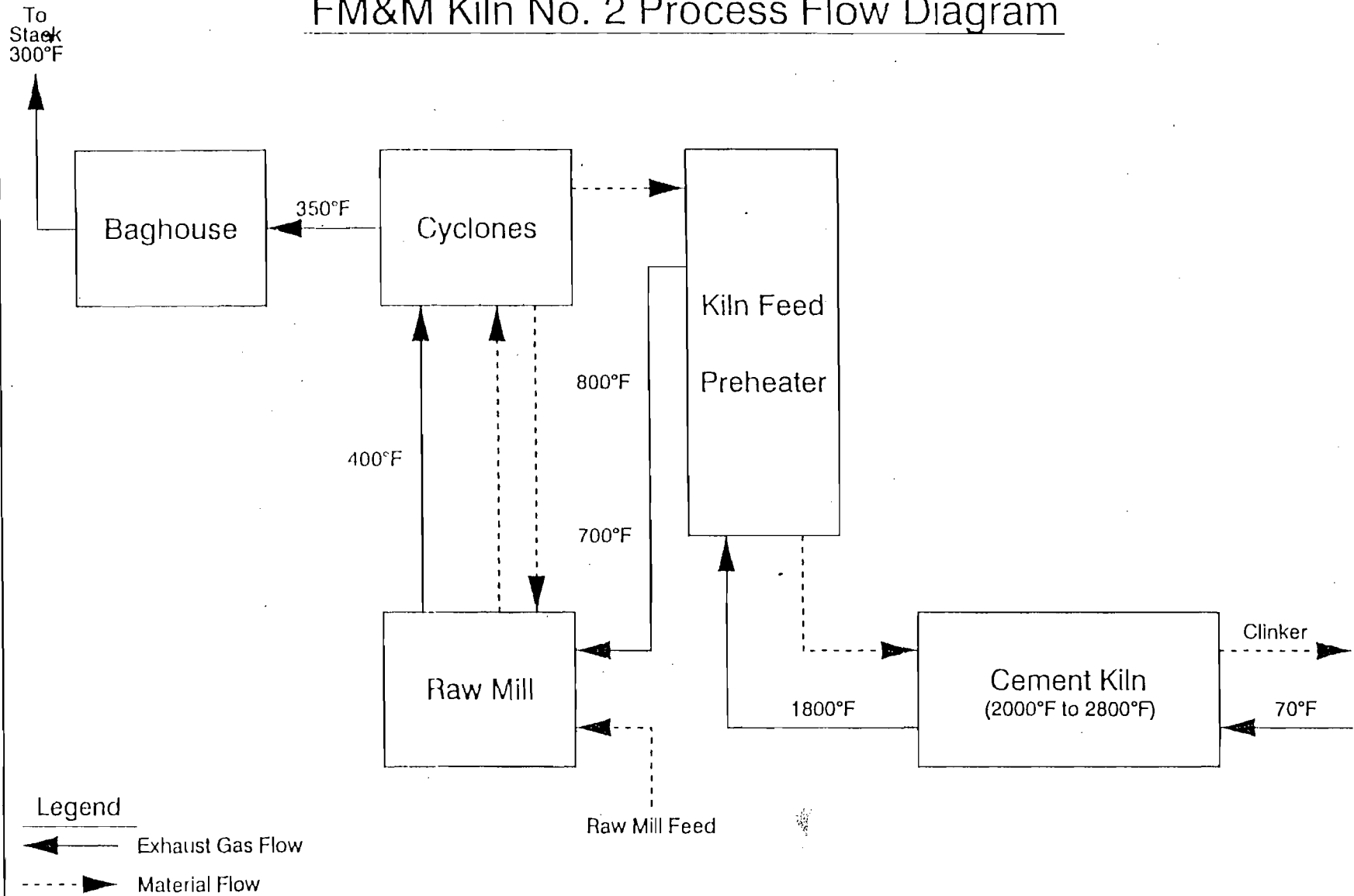
FM&M Kiln No. 1 Process Flow Diagram

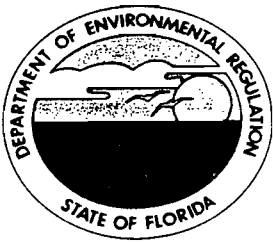


FMM1FLOW.DRW

C
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Cross/Tessitore & Assoc., P.A.
Environmental Engineers Orlando, Florida

Figure V-4
 FM&M Kiln No. 2 Process Flow Diagram





Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 7, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

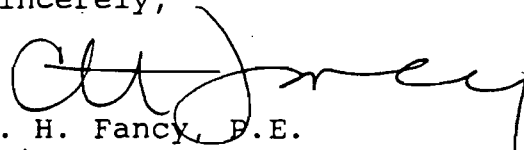
D. Anetha Lue, P.E.
Manager, Air Permitting
Southdown, Inc.
1200 Smith Street, Suite 2400
Houston, TX 77002

Dear Ms. Lue:

RE: Florida Mining and Materials Brooksville Cement Kiln #1
Request for Permit Amendment, AC 27-186923

The Bureau of Air Regulation received your June 26, 1992, request for the above referenced project. On October 30, 1991, Rule 17-4.050(4)(o), F.A.C., was changed to require a \$250 processing fee for permit amendments; therefore, we will not be able to take action on your request until the fee is received. If you have any questions, please call Patty Adams at (904)488-1344.

Sincerely,


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

CHF/pa

cc: Bruce Mitchell

L. Hetrick, HCBCC 8-25-92 Pa

P 710 058 544



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to D. Anetha Lue, Southdown	
Street & No. 1200 Smith Street, Ste 2400	
P.O., State & ZIP Code Houston TX 77002	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 7-9-92 Permit: AC 27-186923	

PS Form 3800, June 1990

SENDER:

- Complete items 1 and/or 2 for additional services:
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
 - Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
D. Anetha Lue, P.E.
Manager, Air Permitting
Southdown, Inc.
1200 Smith Street, Suite 2400
Houston, TX 77002

4a. Article Number
P 710 058 544

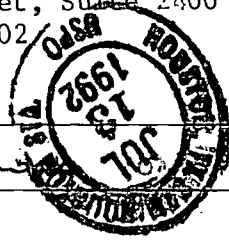
4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
JUL 13 1992

5. Signature (Addressee)
E. Glanville

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)





RECEIVED

JUN 29 1992

Division of Air
Resources Management

RECEIVED
JUN 26 1992
June 26, 1992
Division of Air
Resources Management

Mr. C. H. Fancy
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Re: Florida Mining & Materials Brooksville Cement Kiln #1 -
Request for Permit Amendment, Permit No. A027-213207

Dear Mr. Fancy:

The operating permit for Florida Mining & Materials Kiln #1 was issued by Florida Department of Environmental Regulation on June 16, 1992. Southdown Inc. dba Florida Mining & Materials requests an amendment of Specific Condition No. 4 of this permit.

Specific Condition No. 4 presently states that the operation of the kiln shall be limited in the following manner-

"The Kiln No. 1 process feed rate shall not exceed 130 tons per hour, yielding a maximum clinker production rate of 79.6 tons per hour, averaged on a rolling 30-day production period. [Construction Permit No. AC27-186923]."
(emphasis added)

Southdown is requesting that the production rate be limited by the process feed rate to the kiln only, and that the additional requirement to limit production based on clinker production rate be deleted from the permit. Thus the amended permit would state that-

"The Kiln No. 1 process feed rate shall not exceed 130 tons per hour averaged on a rolling 30-day production period. [Construction Permit No. AC27-186923]."

This request is based on the fact that the production rate is limited by only one of these interdependent variables, and the fact that direct measurement of the process feed rate only is available.

Please note that the requested amendment will not alter the operation of the kiln in any way, and that this change will only serve to make the permit more applicable to the existing system.

Should it be necessary to amend the construction permit for this kiln (AC 27-186923) in order to effect the change, please proceed accordingly.

Please contact me at (713)650-8056 with any questions regarding this request. Thank you for your attention to this matter.

Sincerely,



D. Anetha Lue, P.E.
Manager, Air Permitting

cc: B. Mitchell
B. Thomas, SW Dist
C. Hetrick, HC BCC r-25-92 RR

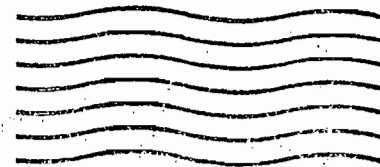
bcc: Jeet Gill
Don Kelly
Matt Stone



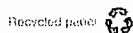
Brooksville Cement

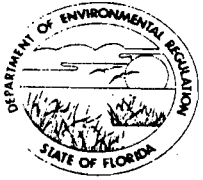
A Southdown Company

P.O. Box 6 • Brooksville, Florida 34605-0006



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





State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Steve Smallwood
FROM: Clair Fancy *CF*
DATE: March 31, 1992
SUBJ: Amendment to Construction Permit-Expiration Date Extension
Florida Mining & Materials-Kiln No. 1
AC 27-186923

Attached for your approval and signature is a letter amending the above referenced construction permit extending the expiration date. There is no controversy associated with this action.

I recommend approval and signature of this amendment.

SS/CHF/rbm

Attachment

(OK)



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 31, 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Don Kelly
Plant Manager
Florida Mining & Materials
Post Office Box 6
Brooksville, Florida 34605-0006

Dear Mr. Kelly:

Re: Amendment to Construction Permit-Expiration Date Extension
AC 27-186923: Kiln No. 1

The Department has reviewed the above request contained in Mr. Amarjit S. Gill's letters received March 30 (FAX) and 31, 1992. The request is acceptable and the following will be changed and added:

1. Expiration Date

From: May 31, 1992
To: May 31, 1993

2. Attachments to be Incorporated

- o Mr. Amarjit S. Gill's letter received March 30, 1992, via FAX.
- o Mr. Amarjit S. Gill's letter and processing fee received March 31, 1992.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the amendment applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

Mr. Don Kelly

Page 2

The Petition shall contain the following information;

(a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit Amendment File Number and the county in which the project is proposed;

(b) A statement of how and when each petitioner received notice of the Department's action or proposed action;

(c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;

(d) A statement of the material facts disputed by Petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;

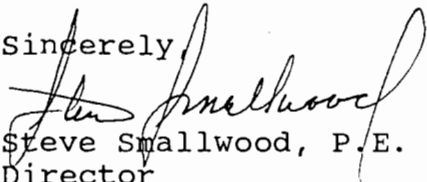
(f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This letter must be attached to the construction permit, No. AC 27-186923, and shall become a part of the permit.

Sincerely,


Steve Smallwood, P.E.

Director

Division of Air Resources
Management

Mr. Don Kelly
Page 3

SS/BM/rbm

Attachments

cc: B. Thomas, SWD
C. Hetrick, HCBCC
J. Tessitore, P.E., C/T&A
J. Koogler, Ph.D., P.E., K&A
A. Gill, P.E., SI
G. Smallridge, Esq., DER

P 832 538 942



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1990

Sent to <i>Don Kelley</i>	
Street & No. <i>Gla. Mining & Mat.</i>	
P.O., State & ZIP Code <i>Brooksville, FL</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date <i>4-14-92</i> <i>AC 27-186923</i>	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to
Mr. Don Kelley
Plant Manager
Gla. Mining & Materials
P.O. Box 6
Brooksville, FL 34605-0006

4a. Article Number
P 832 538 942

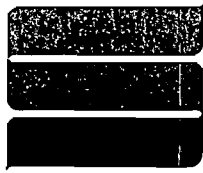
4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
4-20-92

5. Signature (Addressee)

6. Signature (Agent)





RECEIVED
DER - MAIL ROOM
1992 MAR 31 AM 11:03

March 30, 1992

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, Florida 32399-2400

Subject: Florida Mining and Materials
Brooksville Cement Plant
Cement Kiln #1: Permit No. AC27-186923
Request For An Extension In Expiration Date

Dear Mr. Fancy:

In response to Mr. Peter Cunningham's letter dated September 26, 1991, the Florida Department of Environmental Regulation approved an extension in the expiration date, by letter dated October 8, 1991, from December 31, 1991 to March 31, 1992, for Florida Mining & Materials' construction permit AC27-186923 for Kiln No. 1.

Emission testing, required by Specific Condition 12 was completed on February 28, 1992. In accordance with Specific Condition No. 10, Southdown will be submitting the test report by April 13, 1992. At that time an application for a permit-to-operate will also be submitted in accordance with Specific Condition 15.

Therefore, it is requested that the expiration date for construction permit AC27-186923 for Kiln No. 1, be extended by six months, from March 31, 1992 to September 30, 1992. A check for \$50.00 is enclosed as the processing fee for this minor modification. If you need additional information please call me at (713) 653-8098.

Sincerely,

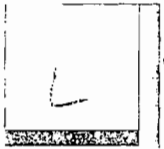
Amarjit S. Gill
Amarjit S. Gill, P.E.
Senior Air Permitting Engineer

c: Mr. Steve Smallwood, P.E., Director
Div. of Air Resources Management, FDER

001031

BEST AVAILABLE COPY

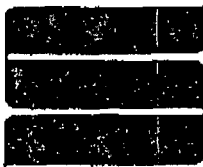
0079 4532 720	REFERENCE NUMBER	
	NAME	TELEPHONE
	COMPANY	
	STREET ADDRESS	
	CITY	STATE ZIP CODE
	NAME	TELEPHONE
	COMPANY	
	STREET ADDRESS	DEPT./FLOOR
	CITY	STATE ZIP CODE



UPS SHIPPER NUMBER
N773--X73

TRACKING
0079 4532 720





ENVIRONMENTAL AFFAIRS DEPARTMENT
Telecopy Number (713) 653-8567

High Priority Medium Priority Normal Priority

DATE: 3/30/92 TOTAL PAGES: 2

TO: MR. BRUCE MITCHELL

AT: FLORIDA DEPT. OF ENV. REGULATION

FAX NO: (904) 922-6979

FROM: AMARJIT SINGH GILL

If problems occur during transmlsion, please phone (713) 653-6200.

MESSAGE: LETTER & CHECK WILL ALSO BE SENT
BY OVERNIGHT MAIL.

Jeet Gill

The information contained in this facsimile message is intended only for the personal and confidential use of the designated recipient(s) named above. If the reader of this message is not the intended recipient(s) or an agent responsible for delivering it to the intended recipient(s), you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us by mail. Thank you.

Environmental Affairs Group: Barbara R. Berardi / Leslie M. Cook / Lillian F. DePrimo / Amarjit ("Jeet") S. Gill / Daniel W. Heintz / Linda Ingram / Janet Krolczyk / Beth Panuska / Philip W. Sadowski / Victor Saufley / L. Diane Schenke / Carl Staszak / Mike A. Tilton

DRAWN ON
Pittsburgh National Bank
JEANNETTE, PENNSYLVANIA
IN COOPERATION WITH
WELLS FARGO BANK, N.A.
#4759-006604

SOUTHDOWN, INC.

60 162 / 433

No. 022842

DATE OF CHECK			CHECK NO.	AMOUNT OF CHECK
03	30	92	22842	\$*****50.00

VOID AFTER 90 DAYS
SOUTHDOWN, INC.

PAY
TO THE
ORDER OF

Florida Dept. of Environmental
Bureau of Air Regulation
Twin Towers Office Bldg.
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Karen A. Turtshell

Brooksville Cement Plant
Cement Kiln #1: Permit No. AC27-186923
Request For An Extension In Expiration Date

Dear Mr. Fancy:

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Therefore, it is requested that the expiration date for construction permit AC27-186923 for Kiln No. 1, be extended by six months, from March 31, 1992 to September 30, 1992. A check for \$50.00 is enclosed as the processing fee for this minor modification. If you need additional information please call me at (713) 653-8098.

Sincerely,

Amarjit Singh Gill
Amarjit S. Gill, P.E.
Senior Air Permitting Engineer

c: Mr. Steve Smallwood, P.E., Director
Div. of Air Resources Management, FDER

001031

Southdown, Inc.

CITICORP CENTER, SUITE 2400, 1200 SMITH STREET, HOUSTON, TEXAS 77002-4486
TELEPHONE: (713) 650-6200



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Steve Smallwood
FROM: Clair Fancy *CS*
DATE: October 7, 1991
SUBJ: Construction Permit Expiration Date Extension
Florida Mining & Materials
AC 27-186923

For your approval and signature is a letter containing an amendment that was prepared by the Bureau of Air Regulation to extend the expiration date of the above referenced construction permit. The facility is located in Brooksville, Hernando County, Florida. There is no controversy associated with this action.

I recommend your approval and signature.

Attachment

SS/BM/rbm

OFF- OK [Signature] 10-9-91



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

October 8, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Don Kelly, Plant Manager
Florida Mining & Materials
Post Office Box 6
Brooksville, Florida 34605-0006

Dear Mr. Kelly:

Re: Expiration Date Extension for Construction Permit
AC 27-186923

The Department has reviewed the above request contained in Mr. Peter C. Cunningham's letter received September 27, 1991. The request is acceptable and the following will be changed and added:

1. Expiration Date

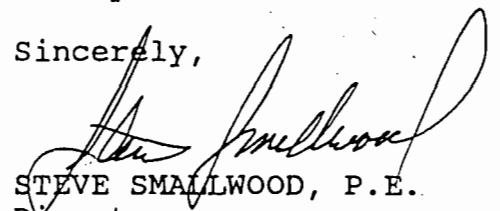
From: December 31, 1991
To: March 31, 1992

2. Attachment to be Incorporated

- o Mr. Peter C. Cunningham's letter received September 27, 1991.

This letter must be attached to the construction permit, No. AC 27-186923, and shall become a part of the permit.

Sincerely,



STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/BM/rbm

Attachment

cc: B. Thomas, SW District
J. Tessitore, P.E., C/T&A
C. Hetrick, HCBCC
P. Cunningham, Esq., HBG&S

P 617 884 170



Certified Mail Receipt
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Service to	Don Kelly
Street & No.	Fla. Mining & Materials
P.O. State & ZIP Code	Brooksville, FL
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	10-10-91 AC 27-186923

PS Form 3800, June 1990

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
- Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Mr. Don Kelly, Plant Mgr.
Fla. Mining & Materials
P.O. Box 8
Brooksville, FL
34605-0006

4a. Article Number
P 617 884 170

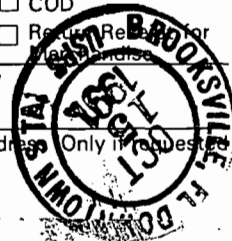
- 4b. Service Type
- Registered
 - Insured
 - Certified
 - COD
 - Express Mail
 - Registered Mail for Return Receipt

7. Date of Delivery
10-18-91

5. Signature (Addressee)
Betty Co. [Signature]

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)



HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

123 SOUTH CALHOUN STREET

POST OFFICE BOX 6526

TALLAHASSEE, FLORIDA 32314

(904) 222-7500

FAX (904) 224-8551

CARLOS ALVAREZ
JAMES S. ALVES
BRIAN H. BIBEAU
KATHLEEN BLIZZARD
ELIZABETH C. BOWMAN
WILLIAM L. BOYD, IV
RICHARD S. BRIGHTMAN
PETER C. CUNNINGHAM
THOMAS M. DeROSE
WILLIAM H. GREEN
WADE L. HOPPING
FRANK E. MATTHEWS
RICHARD D. MELSON
WILLIAM D. PRESTON
CAROLYN S. RAEPPLE
GARY P. SAMS
ROBERT P. SMITH, JR.
CHERYL G. STUART

RICHARD W. MOORE
ANGELA R. MORRISON
MARIBEL N. NICHOLSON
DIANA M. PARKER
LAURA BOYD PEARCE
GARY V. PERKO
MICHAEL P. PETROVICH
DAVID L. POWELL
DOUGLAS S. ROBERTS
CECELIA C. SMITH

OF COUNSEL
W. ROBERT FOKES

September 26, 1991

RECEIVED

SEP 27 1991

Division of Air
Resources Management

BY HAND DELIVERY

Clair Fancy, P.E., Bureau Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
2600 Blair Stone Road, Room 338
Tallahassee, Florida 32399-2400

Re: Florida Mining & Materials
Brooksville Cement Plant
Kiln No. 1; Permit No. AC27-186923

Dear Clair:

I am writing on behalf of Florida Mining & Materials ("FMM") regarding the referenced air construction permit for Kiln No. 1 at the Brooksville Cement Plant, which was issued by the Department on March 12, 1991. The expiration date for this permit is December 31, 1991. Pursuant to Specific Condition 14 of the permit, and for the reasons set forth below, FMM hereby requests an extension of the permit expiration date to March 31, 1991.

As you will recall, the construction permit authorized use of Flolite in Kiln No. 1 and revised certain restrictions on production rate and annual hours of operation, in accordance with FMM's application. Specific Condition 12 of the permit provides as follows:

12. For PSD purposes and one time requirement, the permittee shall test for all pollutant emissions expected from the No. 1 kiln while firing the Flolite in all of its firing modes. At a minimum, the permittee shall test for the pollutants PM, PM₁₀, SO₂, NO_x, CO, and VOC using EPA Methods 5,

Clair Fancy, P.E., Bureau Chief
September 26, 1991
Page 2

201 or 201A, 6, 7, 10, and 25, respectively, or any other test method or equivalent that has received prior approval by the Department. An ultimate analysis of the particulate filter shall also be required. The test methods shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR (July, 1989 version).

In addition, Specific Condition 15 of the permit requires FMM to submit an application for an air operation permit for Kiln No. 1 at least 90 days prior to the construction permit expiration date. That application must include, among other items, "compliance test reports as required by this permit".

Assuming that the emissions testing required by Specific Condition 12 of the permit is considered "compliance testing", the test reports would have to be included in FMM's application for an operation permit, which is to be submitted by September 30, 1991. Unfortunately, completion of this emissions testing has been precluded because of delays in the issuance of Department permits that would adjust certain production rate restrictions for four "auxiliary sources" associated with Kiln No. 1. While the Department proposed issuance of these permits (AC27-191611 for Clinker Cooler No. 1; AC27-191616 for the Clinker Storage Silo; AC27-191615 for the Blending and Storage Silos; AC27-191612 for Raw Mill No. 1), final agency action has not been taken on them due to a third party request for an administrative hearing that is still pending. The production rate restrictions in the air operation permits for these sources thus remain in effect. As a result, Kiln No. 1 cannot be operated at the increased production rate authorized under permit No. AC27-186923, and emissions testing of Kiln No. 1 at the newly permitted capacity cannot be performed.

These circumstances constitute good cause for an extension of the expiration date for the Kiln No. 1 construction permit. An extension of 90 days, to March 31, 1991 will allow time for the required emissions testing and submission of an operation permit application by December 31, 1991, assuming the auxiliary source permit proceedings are resolved in the near future.

Please do not hesitate to call me if you or members of your staff have any questions regarding this request. As

Clair Fancy, P.E., Bureau Chief
September 26, 1991
Page 3

always, your consideration in this matter is much appreciated.

Sincerely,

Peter C. Cunningham lcb
Peter C. Cunningham

FancyLtr:PCC/gbb

cc: Bruce Mitchell
Douglas Beason, Esquire
Bill Thomas
Joe Tessitore
Diane Schenke, Esquire
CHF/BA/PL

C.D 4A
~#18

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS
123 SOUTH CALHOUN STREET
POST OFFICE BOX 6526
TALLAHASSEE, FLORIDA 32314
(904) 222-7500
FAX (904) 224-8551

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DAVID L. POWELL
DOUGLAS S. ROBERTS
CECELIA C. SMITH
OF COUNSEL
W. ROBERT FOKES

July 29, 1991

RECEIVED

JUL 29 1991

Division of Air
Resources Management

BY HAND DELIVERY

Mr. Steve Smallwood
Director, Division of Air Resources
Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Mining & Materials;
Request For Approval of New Stack at
Brooksville Cement Plant Kiln No. 1
Permit No. AC 27-186923

Dear Steve:

I am writing on behalf of Florida Mining & Materials (FMM) to clarify a statement made in your letter of June 25, 1991 to Mr. Don Kelly, Manager of the Brooksville Cement Plant, regarding the referenced matter. Your letter indicated that the Department does not object to FMM's request to construct a new stack for Kiln No. 1, but noted that "you will not be able to take credit for the increased plume rise by combining the 16 baghouse system flues (i.e., in any future modeling demonstrations)."

Joe Tessitore and I contacted Tom Rogers of the Bureau of Air Monitoring and Assessment to discuss this statement, and based upon that conversation we understand that it is intended solely to acknowledge that provisions of the Department's stack height rule (Florida Administrative Code Rule 17-2.270) may, in some cases, prohibit taking credit for certain "dispersion techniques" in modeling demonstrations. Mr. Rogers agreed that credit can be taken for the new stack height (150 feet), and that the referenced rule only precludes modeling credit for any increased "plume rise" that is associated with a new stack configuration. The attached letter from Mr. Tessitore sets forth pertinent facts about the new stack proposed for Kiln No. 1 which


Mr. Steve Smallwood
July 29, 1991
Page 2

demonstrate that there will be no increase in exhaust gas temperature and no increase (in fact a reduction) in exhaust gas exit velocity. Consequently, FMM understands that full modeling credit may be taken for the new stack parameters, which is the approach taken in the modeling analysis presented in the pending application (dated June 7, 1991) for approval of a test burn of solid hazardous waste fuel at Kiln No. 1.

In reliance upon this understanding, FMM intends to commence construction of the new stack for Kiln No. 1, at a cost of approximately \$1.3 million, within one week of the date of this letter unless the Department advises of any disagreement with FMM's analysis regarding the modeling credit allowable for the new stack.

The Department's continued consideration in this matter is much appreciated. Should you or members of your staff have any questions, please do not hesitate to call me.

Sincerely,



Peter C. Cunningham

/kkm:Smallwood

cc: Clair Fancy
Tom Rogers
Diane Schenke, Esquire
Don Kelly
Joe Tessitore

Attachment



CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

RECEIVED

JUL 23 1991

Hopping Boyd
Green & Sams

July 22, 1991

Mr. Peter C. Cunningham
Hopping Boyd Green & Sam
123 South Calhoun Street
Post Office Box 6526
Tallahassee, Florida 32314

Subject: Florida Mining & Materials
(C/TA # F03.360)

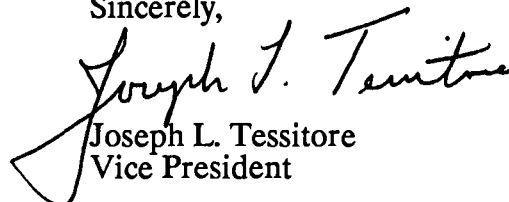
Dear Mr. Cunningham:

This letter is to address the statement contained in the June 25 letter from Mr. Steve Smallwood (FDER) regarding increased plume rise resulting from the proposed No. 1 Cement Kiln Stack modification. This modification will consist of combining the exhaust gas flows currently exiting 16 baghouse vents to one common stack. The letter from Mr. Smallwood states that credit cannot be taken for increased plume rise resulting from this modification. I have reviewed DER 17-2.270 Stack Height Policy which provides the relevant regulation and provides a description of dispersion techniques to effect such plume rise. I have concluded that there would be no increase in plume rise, associated with the proposed stack modification, as disallowed by the referenced regulation. The following facts support this conclusion:

- 1) The proposed stack height (150 ft) is less than 65 meters.
- 2) The proposed stack modification will not affect the exhaust gas flow temperature.
- 3) The proposed stack modification will effect a reduction in exhaust gas exit velocity, thus resulting in a decrease in plume rise due to the velocity component. The attached analysis provides supporting calculations for comparing current and proposed exit velocities.

Should you have any questions or comments regarding this information, please do not hesitate to contact me.

Sincerely,


Joseph L. Tessitore
Vice President

JLT/slw
cc: Diane Schenke, Southdown
C3576.Doc

REGISTERED PROFESSIONAL ENGINEERS

Federal ID # 59-1638534

NO. 1 CEMENT KILN

Current Velocity: (16 Baghouse Vents)

Total Exhaust Flow = 275,000 ACFM

Existing Baghouse Vent Dimensions = 35" x 22"

Existing Baghouse Vent Cross Sectional Area = 5.35 sf (per vent 16 total)

$$\begin{aligned}\text{Velocity} &= \frac{(275,000 \text{ CF/M})}{(60 \text{ S/M}) (16) (5.35 \text{ sf})} \\ &= 53.5 \text{ FPS}\end{aligned}$$

Proposed Velocity: (Single Common Stack)

Total Exhaust Flow = 275,000 ACFM

Proposed Baghouse Stack Diameter = 13.0 ft

Proposed Baghouse Stack Cross Sectional Area = 132.73 sf

$$\begin{aligned}\text{Velocity} &= \frac{(275,000 \text{ CF/M})}{(60 \text{ S/M}) (132.73 \text{ sf})} \\ &= 34.5 \text{ FPS}\end{aligned}$$

Current Velocity > Proposed Velocity

Thus no increase in Plume Rise due to Velocity Change from Stack Modification



Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
TO: _____	LOCTN: _____
TO: _____	LOCTN: _____
TO: _____	LOCTN: _____
FROM: _____	DATE: _____

TO: Revenue Section
Bureau of Finance and Accounting

FROM: Cost Center Air Regulation

SUBJECT: Cash Listing Number # 00102 Dated 06-28-91

The cash listing received from your office has been checked and confirmed to be correct in all areas.

7-8-91
Date

R. Bruce Mitchell
Signature of Verifying Party

RECEIVED
 ACCOUNTING & BUDGETING
 91 JUL -2 PM 1:13
 DEPARTMENT OF ENVIRONMENTAL REGULATION

The cash listing received from your office has been checked and found to contain one or more discrepancies. A corrected cash listing is attached. Please adjust your records accordingly.

Date

Signature of Verifying Party

Number of remittances in this cash listing _____.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Cost Center Air Regulation

FROM: Revenue Section
Bureau of Finance and Accounting

DATE: 006-28-91

SUBJECT: Cash Listing # 0102, Deposit # 0586

Please respond to the items marked below and return to the Revenue Section of the Bureau of Finance and Accounting.

- 0 The monies on the attached cash listing have been deposited for your area by the Bureau of Finance and Accounting. A transaction needs to be recorded in PATS for:

<u>Applicant</u>	<u>Amount</u>	<u>Date Received</u>
Cross/Tessitore & Assoc. P.A.	\$ 250.00	

RECEIVED
 ACCOUNTING & MEMORANDUM
 91 JUL -2 PM 1:33
 DEPARTMENT OF ENVIRONMENTAL REGULATION

Please enter the transaction(s) and attach a copy of this memo to the PATS cash listing reflecting the payment(s).

- 0 Receipt number _____ on your cash listing number _____ is out of balance by \$ _____. Please correct and forward a corrected cash listing to the Bureau of Finance and Accounting.
- 0 Other:

jo/dg

Attachment(s)



CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

RECEIVED
DER - MAIL ROOM
1991 JUN 28 AM 10:13

June 26, 1991

Mr. Bruce Mitchell
Bureau of Air Quality
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Florida Mining and Materials
No. 1 Cement Kiln, Permit AC27-186923
(C/TA # F03.360)

Dear Mr. Mitchell:

Please find enclosed a check (No. 5504) for a permit fee of \$250.00 required for the Florida Mining and Materials No. 1 Cement Kiln permit amendment for stack modification.

Should you have any questions or require any further information, please do not hesitate to contact me.

Sincerely,

Patricia Kay Rykowski

Patricia Kay Rykowski
Project Engineer

PKR:slw
Enc: a/s
C3518.DOC

RECEIVED
ACCOUNTING & DIRECTOR'S
91 JUL -2 PM 1:13
DEPARTMENT OF
ENVIRONMENTAL
REGULATION

~~1033~~
1031

**CROSS/TESSITORE
& ASSOCIATES, P.A.**

4763 S. CONWAY ROAD, STE. F
ORLANDO, FL 32812
PHONE 407-851-1484

5504

63-751/631
Branch 413

June 26 19 91

PAY TO THE ORDER OF Florida Dept. of Environmental Regulations

\$ 250.00

Two hundred fifty and no/100

DOLLARS



First Union National Bank
of Florida
Apopka, Florida 32703

Joseph J. Tentone
Margaret F. Cross

FM&M No. 1 Cement Kiln Stack Modif.

Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Florida Mining and Materials
No. 1 Cement Kiln, Permit AC27-186923
(C/TA # F03.360)

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Should you have any questions or require any further information, please do not hesitate to contact me.

Sincerely,

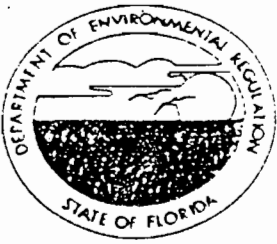
Patricia Kay Rykowski

Patricia Kay Rykowski
Project Engineer

PKR:slw
Enc: a/s
C3518.DOC

1033
1031

RECEIVED
ACCOUNTING & BUDGETING
91 JUL - 2 PM 1:13
DEPARTMENT OF ENVIRONMENTAL REGULATION



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

FAX TRANSMITTAL LETTER

DATE: 7-2-91

TO:

NAME: Mr. Joe Tessitore

AGENCY: Cross / Tessitore + Associates

TELEPHONE: (407) 855-0369

OF PAGES (INCLUDE COVER SHEET): 2

FROM:

NAME: Bruce Mitchell

AGENCY: DER / DARM / BAR

IF ANY PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY. PHONE NO. 904-488-1344

SENDER'S NAME: Same

COMMENTS: FM + M: #1 kiln stack issue

MESSAGE CONFIRMATION

JUL-02-'91 TUE 10:57

TERM ID: DIV OF AIR RES MGMT P-9999

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
094	07-02	10:56	00'01'20	407 855 0369		02	00

Department of Environmental Regulation

Daily Cash Listing # 0102

Date Received 06-28-91

DEP# 0586

Bureau of Accounting & Budgeting (Revenue Section)

Date Bureau of Air Regulation Received _____

Listor's Signature Lil Sweeney

Signature of Receiver _____

REMITTED BY	CHECK NUMBER	AMOUNT	RECEIPT NUMBER	REVENUE CODE	FILE NUMBER
Cross/Tessitore & Associates P.A.	# 5504	\$ 250.00	✓ # 151288	001031	AC 27-199175

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 151288

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Cross/Tessitore & Assoc / FL Mining + Materials Date 07-08-91

Address 4763 Conway Road, Suite F Orlando, FL 32812 P.O. Box 6 Brooksville, FL 34605-0006 Dollars \$ 250.00

Applicant Name & Address Mr. Don Kelly (FM41A)

Source of Revenue ✓ # 5504

Revenue Code 001031 Application Number AC 27-186923 amendment
AC 27-199175 - (subcode M-1)

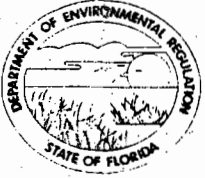
By R Bruce Mitchell

DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED
BUREAU OF ACCOUNTING & BUDGETING
91 JUL -2 PM 1:13

Total this Page

\$ 250.00



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Carol Browner

for FROM: Steve Smallwood *CSJ*

DATE: March 1, 1991

SUBJ: Approval of Construction Permit No. AC 27-186923
Florida Mining and Materials
No. 1 Kiln

Attached for your approval and signature is a permit for a modification prepared by the Bureau of Air Regulation (BAR) for the above referenced company to be allowed to fire a re-refined oil (Flolite) in the No. 1 Kiln at their facility located in Brooksville, Hernando County, Florida. There were no written comments received during the public notice period. However, a letter was received via FAX on March 1, 1991, from Mr. Joseph L. Tessitore (P.E. of record), requesting that all references to the clinker cooler be deleted from this permit because of a current permitting action on this source. The BAR agrees with the request and all references to the clinker cooler will be deleted in the final permit for signature. Also, a correction to an ASTM citing was made; and, an additional clarification relating to metals and toxics was made.

Day 90, after which this permit will be issued by default, is May 2, 1991.

I recommend your approval and signature.

CF/BM/rbm



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
NOTICE OF PERMIT

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

March 12, 1991

Enclosed is construction permit AC 27-186923 for Florida Mining and Materials to burn flolite in the No. 1 kiln at their facility in Hernando County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Barry D. Anderson

for C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

Copy furnished to:

B. Thomas, SW District
J. Tessitore, P.E.
C. Hetrick, Hernando County

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of buisness on 3-13-91.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kuni Jaber
Clerk

3-13-91
Date

Final Determination

Florida Mining and Materials
Hernando County
Brooksville, Florida

Construction Permit
No. AC 27-186923

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

March 1, 1991

Final Determination

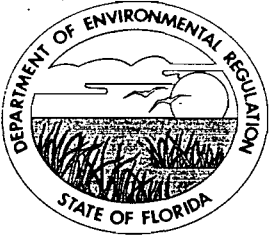
The construction permit application package and supplementary material have been reviewed by the Department. Public Notice of the Department's Intent to Issue was published in The Sun-Journal on January 29, 1991. The Technical Evaluation and Preliminary Determination were available for public inspection at the Department's Southwest District office and the Department's Bureau of Air Regulation (BAR) office.

There were no written comments received during the public notice period. However, a letter was received via FAX on March 1, 1991, from Mr. Joseph L. Tessitore (P.E. of record), requesting that all references to the clinker cooler be deleted from this permit because of a current permitting action on this source. The BAR agrees with the request and all references to the clinker cooler will be deleted in the final permit for signature. Also, the citing for the ASTM for sulfur content in coal will be corrected in Specific Condition No. 3 from ASTM-D-3177-84 to ASTM D3177-75; and, further clarification of the allowable specific concentrations of metals and toxics in Flolite will be included in Specific Condition No. 4 and will be as follows: Cadmium - 0.3 ppm; Lead - 5.0 ppm; and, Arsenic - 1.0 ppm.

Attachment to be Incorporated

9. Mr. J. L. Tessitore's letter dated February 28, 1991, and received via FAX on March 1, 1991.

Therefore, it is recommended that the construction permit be issued as drafted, with the above changes incorporated.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

PERMITTEE:
Florida Mining and Materials
P. O. Box 6
Brooksville, Florida
34605-0006

Permit Number: AC 27-186923
Expiration Date: December 31, 1991
County: Hernando
Latitude/Longitude: 28°38'34"N
82°28'25"W
Project: Modification to burn
Flolite in Kiln No. 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4, and 40 CFR (July, 1989 version). The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the No. 1 kiln to burn Flolite during startup, idle times, and as a limited supplemental fuel with coal (maximum of 250 hrs/yr). The kiln has a maximum process input rate of 130 tons per hour (product weight of 79.6 tons per hour) and maximum heat input rate of 300.0 MMBtu/hr. No. 6 fuel oil will be used as a backup fuel. The facility is located in Brooksville, Hernando County, Florida. The UTM coordinates are Zone 17, 356.0 km East and 3169.9 km North.

The Source Industrial Code: 3241 Cement Manufacturing

The source shall be modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Florida Mining & Materials (FM&M) application received on September 25, 1990.
2. DER's incompleteness letter dated October 23, 1990.
3. FM&M's response received November 26, 1990.
4. FM&M's response received via FAX November 26, 1990.
5. FM&M's response received via FAX January 2, 1991.
6. FM&M's response received via FAX January 7, 1991.
7. FM&M's response received January 9, 1991.
8. Technical Evaluation and Preliminary Determination dated January 18, 1991.
9. Mr. J. L. Tessitore's letter dated February 28, 1991, and received via FAX on March 1, 1991.

PERMITTEE: Permit Number: AC 27-186923
Florida Mining and Materials Expiration Date: December 31, 1991

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:

Florida Mining and Materials

Permit Number: AC 27-186923

Expiration Date: December 31, 1991

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE: Florida Mining and Materials **Permit Number:** AC 27-186923
Expiration Date: December 31, 1991

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes compliance with New Source Performance Standards (NSPS).

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

PERMITTEE: Permit Number: AC 27-186923
Florida Mining and Materials Expiration Date: December 31, 1991

GENERAL CONDITIONS:

- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. Continuous operation is permitted (i.e., 8760 hrs/yr).
2. The No. 1 kiln's total process input rate shall not exceed 130 tons per hour (wet basis), yielding a maximum clinker product weight of 79.6 tons per hour (dry basis).
3. Except during startup, the No. 1 kiln's maximum process heat input rate shall not exceed 300.0 MMBtu per hour (based on firing a maximum of 24,000 lbs/hr coal with a heating value of 12,500 Btu/lb). The sulfur content of the coal shall not exceed 1.0 percent by weight using ASTM D3177-75. Coals with heating values

PERMITTEE:

Permit Number: AC 27-186923

Florida Mining and Materials

Expiration Date: December 31, 1991

SPECIFIC CONDITIONS:

lower than 12,500 Btu per pound shall be fired only if the sulfur content to heat value ratio of the coal does not exceed 0.83 pounds of sulfur per MMBtu of heat input.

4. The total combined times when using Flolite during startup periods (no coal used), idle times (maximum allowable process heat input of 300.0 MMBtu maintained but no process feed input), and as a limited supplemental fuel with coal (coal unable to sustain maximum allowable process heat input requirement), shall not exceed 250 hours per year. Other than coal, permitted fuels shall consist of either Flolite (re-refined oil blend) containing no more than 1 percent sulfur, by weight, or No. 6 fuel oil containing no more than 0.77 percent sulfur, by weight. Maximum Flolite usage rate is 2069 gals/hr (@ 145,000 Btu/gal). Maximum No. 6 fuel oil usage rate is 1974 gals/hr (@ 152,000 Btu/gal). At all times, the Flolite shall contain no higher concentration of metals or toxics than stated in the certified analysis submitted with Exhibit III of the application and listed in the following:

Cadmium - 0.3 ppm; Lead - 5.0 ppm; and, Arsenic - 1.0 ppm.

5. Particulate matter (PM) emissions from the No. 1 kiln shall not exceed 0.15 kg/metric ton of feed (dry basis) to the kiln (0.30 lb/ton; 39.0 lbs/hr, 169.8 TPY).

6. Visible emissions (VE) from the No. 1 kiln shall not exceed 20% opacity.

7. Compliance shall be demonstrated, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A (1989), using EPA Method 5 for PM and EPA Method 9 for VE.

8. The No. 1 kiln's total process input rate and clinker production rate shall be monitored and recorded daily in accordance with 40 CFR 60.63. The coal feed rate to the kiln and the average coal sulfur content and heating value (Btu/lb) of each coal shipment shall be determined and recorded. If coal of sulfur content exceeding 1.0 percent, by weight, is fired in the kiln, (due to variability in the sulfur content of coal within a shipment) samples will be taken of coal entering the kiln at a minimum frequency of once per hour and analyzed for sulfur content. The average sulfur content of samples taken within each 3-hour period shall not exceed 1.0 percent, by weight.

PERMITTEE: Florida Mining and Materials Permit Number: AC 27-186923
Expiration Date: December 31, 1991

SPECIFIC CONDITIONS:

9. The applicant shall comply with all of the applicable provisions and requirements of F.A.C. Chapters 17-2 and 17-4, and 40 CFR (July, 1989 version).

10. The DER's Southwest District office shall be notified in writing at least 15 days prior to compliance testing. Test reports shall be submitted to the DER's Southwest District office within 45 days of compliance test completion.

11. Any change in the method of operation, fuels, equipment, startup, or operating hours, pursuant to the term "modification" (F.A.C. Rule 17-2.100), shall be submitted for evaluation and approval to the DER's Bureau of Air Regulation (BAR) office.

12. For PSD purposes and one time requirement, the permittee shall test for all pollutant emissions expected from the No. 1 kiln while firing the Flolite in all of its firing modes. At a minimum, the permittee shall test for the pollutants PM, PM₁₀, SO₂, NO_x, CO, and VOC using EPA Methods 5, 201 or 201A, 6, 7, 10, and 25, respectively, or any other test method or equivalent that has received prior approval by the Department. An ultimate analysis of the particulate filter shall also be required. The test methods shall be in accordance with F.A.C. Rule 17-2.700 and 40 CFR (July, 1989 version).

13. The No. 1 kiln and its associated equipment are subject to the applicable provisions of F.A.C. Rules 17-2.240: Circumvention; 17-2.250: Excess Emissions; 17-2.700: Stationary Source Emission Test Procedures; and, 17-4.130: Plant Operations-Problems.

14. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the BAR prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

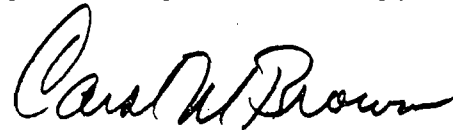
15. An application for an operation permit must be submitted to the DER's Southwest District office at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed and noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

PERMITTEE: Permit Number: AC 27-186923
Florida Mining and Materials Expiration Date: December 31, 1991

SPECIFIC CONDITIONS:

Issued this 8th day
of March, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



Carol M. Browner, Secretary

P 256 396 243

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

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

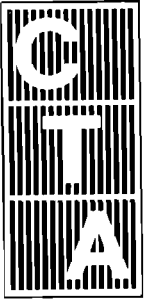
PS Form 3800, June 1985

Sent to	Henry Andre	
Street and No.	FIA Mining & Mat.	
P.O., State, and ZIP Code	Brooksville, FL	
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	3-13-91	
	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)

3. Article Addressed to: Henry E. Andre, VP FIA Mining & Materials P.O. Box 6 Brooksville, FL 32605-0006	4. Article Number P 256 396 243
5. Signature - Addressee X [Signature]	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
6. Signature - Agent X	Always obtain signature of addressee or agent and DATE DELIVERED.
7. Date of Delivery 3-26-91	8. Addressee's Address (ONLY if requested and fee paid)



CROSS/TESSITORE & ASSOCIATES, P.A.

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

RECEIVED
10/28/90

NOV 28 1990

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

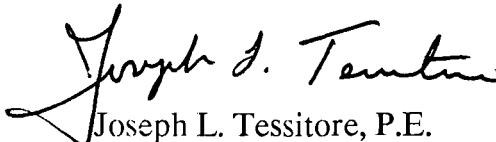
Subject: Florida Mining and Materials
Completeness Review of Application to Construct/Modify
AC27-186923 (No. 1 Kiln)
C/TA # F03.182

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

Compound	Kiln Feed Rate (ton/hr)	Tested Emissions Rate (lb/hr)	Proposed Kiln Feed Rate (ton/hr)	Calculated Emissions Rate (lb/hr)
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

NO

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NOV 26 1990
DER-BAQM

CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S CONWAY ROAD SUITE F
ORLANDO, FLORIDA 32812
407/851-1484



November 26, 1990

RECEIVED
NOV 26 1990
DER-BAQ

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

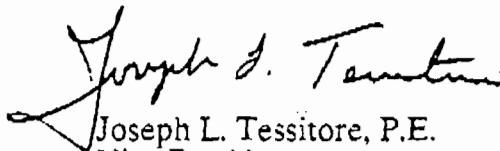
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Completeness Review of Application to Construct/Modify
AC27-186923 (No. 1 Kiln)
C/TA # F03.182

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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

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

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REVISED TABLE

RECEIVED

NOV 26 1990

DER - BAQM

TABLE 1
KILN NO. 1 CALCULATED POTENTIAL EMISSIONS SUMMARY

<u>Compound</u>	Kiln Feed Rate (ton/hr)	Tested Emissions Rate (lb/hr)	Proposed Kiln Feed Rate (ton/hr)	Calculated Emissions Rate (lb/hr)
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ORIGINAL TABLE

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NOV 26 1990
DER - BAQM



CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

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NOV 26 1990

DER - BAQM

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.

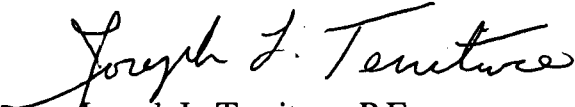
In conclusion, based on the lack of substantial testing data for Kiln No. 1 operating at the increased process feed rates and various fuel firing modes, the following is presented:

- 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



CROSS/TESSITORE & ASSOCIATES, P.A.
4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812



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



TABLE 1
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TABLE 2
PROPOSED PERFORMANCE TEST MATRIX

TEST CONDITIONS

Case	Operating Mode	Kiln Feed Rate T/Hr	Fuel Firing Rates mmBtu/hr		
			Flolite	No. 2 Fuel Oil	Coal
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

RECEIVED
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

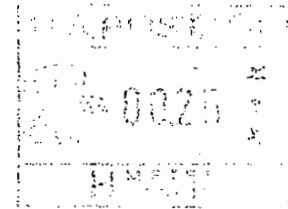
KPL/mre

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

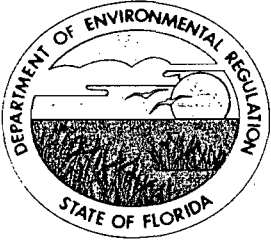
Board of County Commissioners
Hernando County

20 North Main Street, Room 460
Brooksville, Florida 34601



Mr. Clare 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 Twachtman, 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,

 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	S
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	S
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)

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



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 8, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. C. M. Coleman, Jr.
Vice President and General Manager
Florida Mining and Materials
P. O. Box 6
Brooksville, Florida 34605-0006

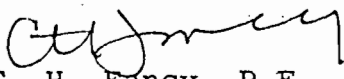
Dear Mr. Coleman:

Re: Construction Permit Application to Burn Flolite in Kiln No. 1

This is in response to your May 21, 1990, letter requesting an amendment of your pending construction permit application to burn Flolite oil in kiln No. 1. The original application and proposed permit stated that Flolite would be used only on startup at a rate of 52.5 gallons/hour. The May 21 request for an increase to 2,069 gallons of Flolite per hour does not specify the number of hours Flolite is to be burned. We suggest that the construction application for burning Flolite in kiln No. 1 be revised and resubmitted since this is a significant departure from the original application. Also, there is the matter of the additional processing fee and another public notice (see attached letter dated April 30, 1990).

If you have questions, please call me or Patty Adams at (904)488-1344.

Sincerely,


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

CHF/JR/plm

Attachment

c: B. Thomas, SW District
J. Tessitore, P.E.
P. Cunningham

P 423 104 518

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

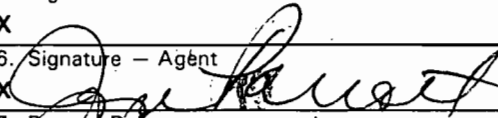
PS Form 3800, June 1985

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

Sent to Mr. C. M. Coleman, FMM	
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: 6-15-90 Permit: AC 27-169616	

SENDER'S 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)

3. Article Addressed to: Mr. C. M. Coleman, Jr. Vice President and General Manager Florida Mining and Materials P. O. Box 6 Brooksville, FL 34605-0006	4. Article Number P 423 104 518 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
5. Signature - Addressee X	Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature - Agent X 	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery 6-18-90	



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

April 30, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph L. Tessitore, P.E.
Cross/Tessitore and Associates
4763 S. Conway Road
Box 12, Suite F
Orlando, Florida 32812

Dear Mr. Tessitore:

On September 5, 1989, Florida Mining and Materials submitted an application to renew permit No. AO 27-89814 for kiln No. 1 to the DER Southwest District. Since the application requested a modification to burn Flolite, it was sent to the Bureau of Air Regulation (BAR) in Tallahassee. The BAR began processing a construction permit application under the originally assigned number (AO-27-169616) and fee (\$750), unaware that the district had issued the renewal permit on January 24, 1990, under the same number.

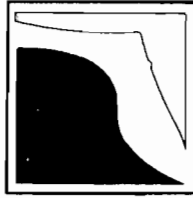
Since the renewed operation permit does not authorize the use of Flolite in kiln No. 1, a new construction permit is still required for this activity and will require a processing fee of \$200 as well as a public notice. As soon as the fee is received the BAR will reissue the intent and the draft construction permit under a new number. After the public notice period and final issuance, the operation permit can be amended to include the use of Flolite. If you have any questions, please call me or Patty Adams at (904)488-1344.

Sincerely,

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

CHF/PA/t

cc: B. Thomas, SW District



FLORIDA MINING & MATERIALS

CONSTRUCTION MATERIALS DIVISION

P. O. BOX 6, BROOKSVILLE, FLORIDA 34605-0006
TELEPHONE (904) 796-7241

C. M. COLEMAN, JR.
VICE PRESIDENT & GENERAL MANAGER

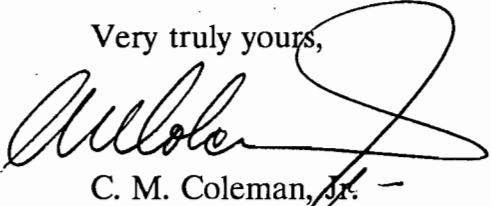
May 21, 1990

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, Florida 32399-2400

Dear Mr. Fancy:

This letter is a request to include the use of Flolite, a re-refined oil, as an alternative fuel in the No.1 kiln at Florida Mining's Brooksville Cement Plant. Please amend the construction permit application to include the use of Flolite at the rate of 2,069 gallons/hour. In addition, please amend the existing construction permit, #AC-272255, dated December 18, 1973, to conform to the amended application.

Very truly yours,



C. M. Coleman, Jr.

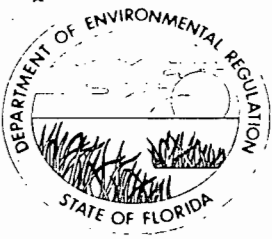
CMC,Jr:gm

cc: J. Reynolds
B. Andrews
B. Thomas, SW Dist.

RECEIVED

MAY 22 1990

DER-BAQM



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

January 9, 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:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Florida Mining and Materials to burn flolite oil for startup of kiln No. 1 at the facility near Brooksville, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Regulation.

Sincerely,


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

CHF/JR/plm

Attachments

c: B. Thomas, SW Dist.
J. Tessitore, P.E.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Florida Mining and Materials
Post Office Box 6
Brooksville, Florida 34605-0006

DER File No. AC 27-169616

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Florida Mining and Materials, applied on September 5, 1989, to the Department of Environmental Regulation for a permit to modify kiln No. 1 at their cement plant to burn re-refined oil during startup only. The applicant's facility is located off U.S. Highway 98 Northwest of Brooksville, Hernando County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office in General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such

person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



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

Copies furnished to:

B. Thomas, SW Dist.
J. Tessitore, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 1-10-90.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kym Deben
Clerk

1-10-90
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Florida Mining and Materials, Post Office Box 6, Brooksville, Florida 34605-0006, to modify kiln No. 1 at their cement plant to burn re-refined oil during startup only. A determination of Best Available Control Technology (BACT) was not required. The applicant's facility is located off U.S. Highway 98 Northwest of Brooksville, Hernando County, Florida. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the

Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of publication of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Southwest District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Florida Mining and Materials
Brooksville, Hernando County, Florida

Modification to Burn Flolite in Kiln No. 1
Permit No. AC 27-169616

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

January 9, 1990

I. Application

A. Applicant

Florida Mining and Materials
Post Office Box 6
Brooksville, Florida 34605-0006

B. Request

The Department received an application on September 5, 1989, for a permit to burn Flolite (blend of virgin and re-refined oils) in place of No. 6 fuel oil in Kiln No. 1 at the applicant's cement plant in Brooksville, Florida. After receiving additional information on November 1, 1989, the application was deemed complete on November 1, 1989.

C. Classification/Location

The applicant's cement manufacturing facility (SIC Code 3241) is located off U.S. Highway 98 Northwest of Brooksville, Florida, with latitude of 28°38'34" N and longitude of 82°28'25"W. The UTM coordinates of the site are: Zone 17, 356.0 km E and 3169.9 km N.

II. Project Description/Emissions

It is proposed to burn an on-specification used oil blend (Flolite) in place of the currently permitted No. 6 fuel oil in Kiln No. 1. Although the application states that Flolite will be used for up to 7,920 hrs/yr, the applicant subsequently explained that Flolite will be used only 250 hours or less (startup only). No. 6 fuel oil will be used only as a backup fuel. Coal is the primary fuel source.

Flolite is a blend of virgin fuel oils and re-refined used oil (mainly used motor oil) resulting in a product with the physical specifications of No. 5 fuel oil. Emissions from the combustion of Flolite instead of No. 6 oil on startup will result in a slight increase in SO₂ emissions (2.0 lbs/hr or 0.25 ton/yr) and essentially no increase in emissions of other regulated air pollutants. Specification data for Flolite indicate no need for concern about excessive emissions of toxics or metals.

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for each of the regulated air pollutants. Although the kiln is a major source, the proposed increase in emissions is insignificant and therefore the proposed

modification is not subject to the new source review requirements of F.A.C. Rule 17-2.500. Applicable rules are F.A.C. Rule 17-2.520, Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C. Rule 17-2.600(7)(b) and F.A.C. Rule 17-2.660, Standards of Performance for New Stationary Sources, Section 60.60, Subpart F, Portland Cement Plants.

IV. Conclusion

Based on the information provided by Florida Mining and Materials, the Department has reasonable assurance that the modification to burn Flolite, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:
Florida Mining and Materials
P. O. Box 6
Brooksville, Florida
34605-0006

Permit Number: AC 27-169616
Expiration Date: September 30, 1990
County: Hernando
Latitude/Longitude: 28°38'34"N
82°28'25"W
Project: Modification to burn
Flolite oil in Kiln No. 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

For the modification of the No. 1 kiln to burn Flolite oil during startup only. The facility is located in Brooksville, Hernando County, Florida. The UTM coordinates are Zone 17, 356.0 km East and 3169.9 km North.

The source shall be modified in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Florida Mining & Materials (FM&M) application received on September 5, 1989.
2. DER's incompleteness letter dated October 4, 1989.
3. FM&M's response received November 1, 1989.

PERMITTEE:

Florida Mining and Materials

Permit Number: AC 27-169616

Expiration Date: September 30, 1990

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE: Permit Number: AC 27-169616
Florida Mining and Materials Expiration Date: September 30, 1990

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE: Florida Mining and Materials Permit Number: AC 27-169616
Expiration Date: September 30, 1990

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes compliance with New Source Performance Standards (NSPS).

14. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

PERMITTEE:

Permit Number: AC 27-169616

Florida Mining and Materials Expiration Date: September 30, 1990

GENERAL CONDITIONS:

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The annual hours of operation of Kiln No. 1 shall not exceed 7920.

2. The No. 1 kiln feed rate shall not exceed 120 tons per hour (wet basis), yielding a maximum clinker-production rate of 71 tons per hour (dry basis).

3. Except during startup, the No. 1 kiln fuel input rate shall not exceed 208.1 MMBTU per hour based on firing 16,800 lbs/hr coal with a heating value of 12,387 BTU/lb. The sulfur content of the coal shall not exceed 1.0 percent by weight using ASTM-D-3177-84.

PERMITTEE:

Florida Mining and Materials

Permit Number: AC 27-169616

Expiration Date: September 30, 1990

SPECIFIC CONDITIONS:

Coals with heating values lower than 12,387 BTU per pound shall be fired only if the sulfur content to heat value ratio of the coal does not exceed 0.83 pounds of sulfur per MMBTU of heat input.

4. During startup periods that are to exceed no more than 250 hours per year, additional fuel input shall not exceed 7.62 MMBTU per hour. Additional startup fuel shall consist of either Flolite re-refined oil blend containing no more than 1 percent sulfur by weight, or No. 6 fuel oil containing no more than 0.77 percent sulfur by weight. At all times the Flolite oil shall contain no higher concentration of metals or toxics than stated in the certified analysis submitted with Attachment 3 of the application.

5. Particulate matter (PM) emissions from the No. 1 kiln shall not exceed 0.30 lb/ton of feed (dry basis) to the kiln; 33 lbs/hr; 130.7 tons/yr.

6. Visible emissions (VE) from the No. 1 kiln shall not exceed 10% opacity.

7. Compliance shall be demonstrated, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60 Appendix A (1989), using EPA Method 5 for PM and DER Method 9 for VE.

8. The kiln feed rate and clinker production rate shall be monitored and recorded daily in accordance with 40 CFR 60.63. The coal feed rate to the kiln and the average coal sulfur content and heating value (BTU/lb) of each coal shipment shall be determined and recorded. If coal of sulfur content exceeding 1.0 percent by weight is fired in the kiln (due to variability in the sulfur content of coal within a shipment) samples will be taken of coal entering the kiln at a minimum frequency of once per hour and analyzed for sulfur content. The average sulfur content of samples taken within each 3-hour period shall not exceed 1.0 percent by weight.

9. The applicant shall comply with all of the applicable provisions and requirements of F.A.C. Chapters 17-2, 17-4, and 40 CFR 60 Subpart F.

10. DER's Southwest District office shall be notified at least 15 days prior to compliance testing. Test reports shall be submitted to DER's Southwest District office within 30 days of compliance test completion.

PERMITTEE: Florida Mining and Materials Permit Number: AC 27-169616
Expiration Date: September 30, 1990

SPECIFIC CONDITIONS:

11. Any change in the method of operation, fuels, equipment, startup or operating hours during the period of this permit shall be submitted for approval to DER's Bureau of Air Regulation office.

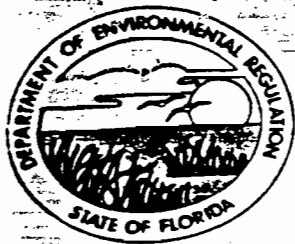
12. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

13. An application for an operation permit must be submitted to the Department's Southwest District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Dale Twachtmann, Secretary



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

PERMITTEE:

Florida Mining & Materials
Post Office Box 6
Brooksville, FL 34605-0006

PERMIT/CERTIFICATION

Permit No.: A027-169616
County: Hernando
Expiration Date: 01-18-95
Project: Rotary Kiln No. 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 & 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the operation of the rotary kiln No. 1, the air suspension preheater, and the raw material grinding mill in a portland cement plant. The particulate emissions and the product of combustion from the rotary kiln pass through the suspension preheater and raw material grinding mill before being exhausted to the Western Precipitation baghouse, equipped with 16 separate compartments and stacks. The kiln is fired on coal or No. 6 fuel oil.

Location: U.S. Highway 98, NW of Brooksville, Hernando County

UTM: 17-356.0 E 3169.9 N NEDS NO: 0010 Point ID: 03

Replaces Permit No.: A027-89814

DEPARTMENT OF ENVIRONMENTAL REGULATION

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)	Initial
<i>Mr. Bruce Mitchell</i>	Date
2.	Initial
<i>DARM - BAR</i>	Date
3.	Initial
<i>DER - Tallahassee</i>	Date
4.	Initial
<i>Twin Towers</i>	Date

REMARKS:

Copies of the permits you requested.

Good Luck.

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

RECEIVED

OCT 18 1990

DER - BAQM

FROM:

Jim McDonald

DATE

10-15-90

PHONE

PERMITTEE:
Florida Mining & Materials

Permit/Certification No.: AD27-169616
Project: Rotary Kiln No. 1

SPECIFIC CONDITIONS:

1. A part of this permit is the attached 15 General Conditions.
2. This source is subject to the New Source Performance Standards (NSPS), established for Portland Cement Plants (40 CFR 60, Subpart F), which is adopted by reference in Section 17-2.660, F.A.C. The NSPS sets a particulate emission limit of 0.30 pounds per ton of feed (dry basis) to the kiln and a visible emission limit of no greater than 10% opacity.
3. Test the emissions for the following pollutant(s) at intervals of 12 months from the date November 28, 1989 and submit a copy of the test data to the Air Section of the Southwest District Office within forty-five days of such testing (Section 17-2.700(2), Florida Administrative Code (F.A.C.)).

<input checked="" type="checkbox"/> Particulates	<input type="checkbox"/> Sulfur Oxides
<input type="checkbox"/> Fluorides	<input type="checkbox"/> Nitrogen Oxides
<input checked="" type="checkbox"/> Opacity	<input type="checkbox"/> Hydrocarbons
4. Compliance with the emission limitations of Specific Condition No. 2 shall be determined using EPA Methods 1,2,3,5 and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Section 17-2.700, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Section 17-2.700, F.A.C. and 40 CFR 60, Appendix A.
5. Testing of emissions must be accomplished within $\pm 10\%$ of the permitted capacity of 120 tons per hour material input. A compliance test submitted at operating rates less than 90% of the permitted capacity will automatically constitute an amended permit at the lesser rate plus 10% until another test showing compliance at a higher rate is submitted. Failure to submit the input rates and actual operating conditions may invalidate the test (Subsection 403.161(1)(c), Florida Statutes).
6. Test for particulates shall be conducted in the following manner:
 - A. Four baghouse exits will be selected at random by the Department personnel in advance of testing. If the testing requires more than 72 hours, exits originally selected may be replaced by other exits.
 - B. Total gas flow rate to the baghouse will be accurately determined before and after each test run. Each test run will consist of one complete sample from one exit.

PERMITTEE:
Florida Mining & Materials

Permit/Certification No.: A027-169616
Project: Rotary Kiln No. 1

SPECIFIC CONDITIONS:

- C. Each test run will consist of a 48 point test traverse (or less if a longer stack extension is used, Method No. 1 will be used to determine the number of test points).
- D. Each test run will consist of two complete baghouse cycles of 56 minutes each for a total of 112 minutes of sample time for each run. Sampling will be discontinued during the four minute cleaning cycle.
- E. The particulate emissions in pounds per hour will be determined from each stack as well as the kiln feed in tons per hour (dry basis) during the test. The emissions in pounds per ton of kiln feed will be determined as follows:

$$E = \frac{(M)}{(P)} \frac{(V1)}{(V2)}$$

E = Particulate emissions, lbs./ton kiln feed

M = Particulate emissions from the compartment tested, lb/hr

P = Kiln feed, tons/hour (dry basis)

V1 = Total gas flow rate determined at inlet, DSCFH

V2 = Measured gas flow rate from sampled compartment, DSCFH

V1/V2 = Not to exceed 17.5

The emissions will be the average of the results (lbs./ton kiln feed) from the four test runs.

- F. All other requirements of test Methods 1, 2, 3, and 5 remain in effect.
- G. If reasonable doubt of compliance exists after the tests are conducted using this alternate procedure, stack tests will be required on all baghouse exits.
- H. Compliance must be met at all times.

7. Test each emission point for visible emissions when stack tests are being conducted.

8. The permittee shall record the daily production rates and kiln feed rates.

PERMITTEE:
Florida Mining & Materials

Permit/Certification No.: A027-169616
Project: Rotary Kiln No. 1

SPECIFIC CONDITIONS:

9. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following:


- (A) Annual amount of materials and/or fuels utilized.
- (B) Annual emissions (provide a copy of the calculation sheet(s) and basis for calculations).
- (C) Any changes in the information contained in the permit application.

10. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Section 17-2.610(3), F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling.

11. Four applications to renew this operating permit shall be submitted to the Department sixty (60) days prior to the expiration date of this permit.

Issued this 23 day of Jan.
1990

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATION

For 
Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

P 938 762 804

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

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: 1-10-90 Permit: AC 27-169616	

PS Form 3800, June 1985

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)

3. Article Addressed to: Mr. Henry E. Andre, Vice-Pres. Florida Mining and Materials P. O. Box 6 Brooksville, FL 34605-0006	4. Article Number P 938 762 804
	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
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Address X <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>[Signature]</i>	
7. Date of Delivery	



Best Available Copy
CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

RECEIVED
DER - MAIL ROOM
1990 SEP 25 AM 10:12

September 24, 1990

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
Division of Air Resources Management
Permitting and Standards Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

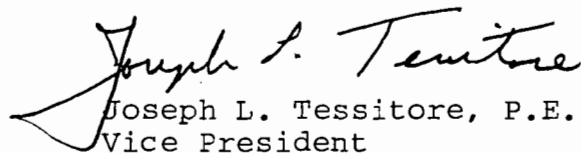
Subject: Florida Mining and Materials
Construction Permit Application to Burn Flolite in
Kiln No. 1.

Dear Bruce:

Attached is the subject application as requested in C. H. Fancy's letter of June 8, 1990. Also included is the additional processing fee as requested.

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/dlk
Enc. a/s
C3319.Doc

B. Charles, 2000 Blair

RECEIVED

SEP 25 1990

DER-BAQ*iv*

**APPLICATION TO AMEND PERMIT
A027-169616 FOR
UTILIZATION OF FLOLITE
IN CEMENT KILN NO. 1**

**FLORIDA MINING AND MATERIALS
BROOKSVILLE, FLORIDA**

September 24, 1990

**Cross/Tessitore & Associates, P.A.
4763 South Conway Road, Suite F
Orlando, Florida 32712
(407)851-1484**

\$200pd.
9-25-90
Receipt # 151176

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION



AC 27-166923

Bob Martinez
GOVERNOR
Dale Twachtman
SECRETARY
Alex Alexander
DISTRICT MANAGER

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Portland Cement Plant New¹ Existing¹
APPLICATION TYPE: Construction Operation Modification
COMPANY NAME: Moore McCormack, Inc. d/b/a Florida Mining & Materials COUNTY: Hernando
Identify the specific emission point source(s) addressed in this application (i.e. Lime
Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) No. 1 Cement Kiln
SOURCE LOCATION: Street U.S. Highway 98 City N.W. of Brooksville
UTM: East 17-356.00 North 3169.89
Latitude 28 ° 38 ' 34 "N Longitude 82 ° 29 ' 25 "W
APPLICANT NAME AND TITLE: H. E. Andre, Vice President, Operations Cement and Aggregates
APPLICANT ADDRESS: P.O. Box 6, Brooksville, Florida 34605-0006

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Moore McCormack, Inc. d/b/a Florida Mining & Materials

I certify that the statements made in this application for a Modification permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: H. E. Andre

H.E. Andre, Vice President, Operations Cement and Aggregates
Name and Title (Please Type)

Date: 9/20/90 Telephone No. (904)796-7241

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

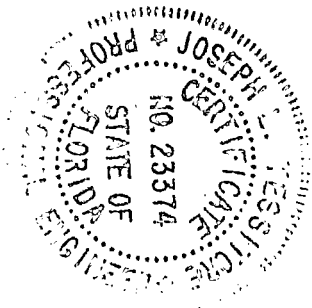
¹ See Florida Administrative Code Rule 17-2.100(5) and (104)

1991/10/14

1991/10/14

SEP 21 1990

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed Joseph L. Tessitore
 Joseph L. Tessitore, P.E.
 Name (Please Type)

Cross/Tessitore and Associates, P.A.
 Company Name (Please Type)

4763 S. Conway Road, Orlando, Florida 32812
 Mailing Address (Please Type)

Florida Registration No. 23374 Date: 9/24/90 Telephone No. (407)851-1484

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

See Attached Project Description

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction Existing Completion of Construction Existing

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.) The following information represents the initial costs associated with the existing baghouse system. No additional air pollution equipment will be required for the subject modification.

Baghouse Equipment	\$ 582,000.00
Erection	\$ 640,000.00
TOTAL	\$1,286,000.00

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

See Table II-1

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;
if power plant, hrs/yr _____; if seasonal, describe: _____

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO
 - a. If yes, has "offset" been applied? _____
 - b. If yes, has "Lowest Achievable Emission Rate" been applied? _____
 - c. If yes, list non-attainment pollutants. _____
2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. NO
3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. NO
4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? YES
5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? NO

- H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? NO
- a. If yes, for what pollutants? _____
 - b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Limestone	Particulate	0.02	207,640	
Sand/Clay	Particulate	0.08	20,774	SEE SUPPLEMENTAL
Fly Ash	Particulate	0.14	26,182	INFORMATION:
Staurolite	Particulate	1.40	2,704	Section V
Mill Scale	Particulate	1.40	2,704	Figure V-4

B Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 260,000

2. Product Weight (lbs/hr): 159,250

C Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission ¹		Allowed Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
			See Table III-1				

¹ See Section V, Item 2.

² Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³ Calculated from operating rate and applicable standard.

⁴ Emission, if source operated without control (See Section V, Item J).

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)
Fuller Dracco				
Joy Western baghouse	Particulate	99.5%	≥ 10 Micron	Manufacturer's Data

E. Fuels ---See Table III-2

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis: See Table III-2

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average _____ Maximum _____

G. Indicate liquid or solid wastes generated and method of disposal.

Solids collected from the fabric filter during normal operation will be returned
to the kiln feed and recycled through the system.

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: 70 ft. Stack Diameter: 3.0 (each vent) ft.
 Gas Flow Rate: 250,000 ACFM 1 DSCFM Gas Exit Temperature: ~ 260 °F.
 Water Vapor Content: ~ 10 % Velocity: 69 FPS

SECTION IV: INCINERATOR INFORMATION
 NOT APPLICABLE

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

NOT APPLICABLE

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, wash, etc.):

NOT APPLICABLE

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

See Table V-1 and Emissions Calculations

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

NOT APPLICABLE

Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

Has EPA declared the best available control technology for this class of sources (if yes, attach copy)

Yes No

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

What emission levels do you propose as best available control technology?

Contaminant

Rate or Concentration

Contaminant	Rate or Concentration

Describe the existing control and treatment technology (if any).

1. Control Device/System:

2. Operating Principles:

3. Efficiency:*

4. Capital Costs:

Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant

Rate or Concentration

NOT APPLICABLE

10. Stack Parameters

a. Height:

ft.

b. Diameter:

ft.

c. Flow Rate:

ACFM

d. Temperature:

°F.

e. Velocity:

FPS

E. Describe the control and treatment technology available (As many types as applicable use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Cost:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

- a. Control Device:
- b. Operating Principles:
- c. Efficiency:¹
- d. Capital Costs:
- e. Useful Life:
- f. Operating Cost:
- g. Energy:²
- h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

F Describe the control technology selected:

- 1. Control Device:
- 2. Efficiency:¹
- 3. Capital Cost:
- 4. Useful Life:
- 5. Operating Cost:
- 6. Energy:²
- 7. Maintenance Cost:
- 8. Manufacturer:
- 9. Other locations where employed on similar processes:
- a. (1) Company:
- (2) Mailing Address:
- (3) City:
- (4) State:

¹ Explain method of determining efficiency.
² Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

NOT APPLICABLE

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

NOT APPLICABLE

(8) Process Rate:¹

10. Reason for selection and description of systems:

Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

NOT APPLICABLE

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

NOT APPLICABLE

2. Instrumentation, Field and Laboratory

- a. Was instrumentation EPA referenced or its equivalent? [] Yes [] No
- b. Was instrumentation calibrated in accordance with Department procedures?
[] Yes [] No [] Unknown

3. Meteorological Data Used for Air Quality Modeling

- 1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year
- 2. Surface data obtained from (location) _____
- 3. Upper air (mixing height) data obtained from (location) _____
- 4. Stability wind rose (STAR) data obtained from (location) _____

4. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

5. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ²	_____ grams/sec

6. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

Attach all other information supportive to the PSD review.

7. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

8. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

PROJECT DESCRIPTION

The subject of this application is the proposed addition of Flolite to the fuels currently used by the Florida Mining & Materials No. 1 Kiln. Flolite is a re-refined "on-spec" product which is similar to No. 5 fuel oil.

As proposed, Flolite would be mainly used during start-up of kiln operations and during periods when raw materials feed is stopped and the kiln temperature must be maintained. Flolite would be used at rates of up to 2069 gal/hr during these periods and for approximately 250 hrs/yr.

The proposed utilization of Flolite will not result in an increase in emissions of particulate, sulfur dioxide, carbon monoxide, volatile organic compounds or nitrogen dioxide (NO_x).

The sulfur content of Flolite is consistent with that of the coal currently used, therefore emissions of sulfur dioxide should remain unchanged. Emissions of nitrogen dioxide (NO_x) may actually decrease, due to the reduced excess air required for combustion of liquid rather than solid fuels.

TABLE II-1
PERMITTING AND COMPLIANCE ACTIVITIES

<u>Activity</u>	<u>Number</u>	<u>Issued</u>	<u>Expired</u>
Construction Permit	AC27-2255	December 18, 1973	March 1, 1976
Construction Permit Extension	AC27-2255	--	--
Operating Permit	A027-20213	August 13, 1979	August 7, 1984
Operating Permit	A027-89814	October 5, 1984	October 3, 1989
Operating Permit	A027-169616	January 24, 1990	January 18, 1995

TABLE III-1
REGULATED EMISSIONS SUMMARY

Parameter	Current Allowable Emissions		Allowed Emission Rate Per Rule 17-2	Potential Emissions	
	lbs/hr	T/yr		lbs/hr	T/yr
Particulate	36.0	----	N/A	36.0	151.2
Opacity	10%	----	Rule 17-2.660	10%	----

TABLE III-2

FUELS DATA

Fuel Type	Heat Capacity		Sulfur Content ²	Maximum Usage Rate	Maximum Heat Input (Btu/hr)
Current:					
Coal	12,500	Btu/lb	1.0 %	12 T/hr	3.0×10^8
No. 6 Diesel Oil	152,000	Btu/gal	0.77 %	1974 T/hr	3.0×10^8
Proposed:					
Flolite ¹	145,000	Btu/gal	1.0 %	2069 gal/hr	3.0×10^8
Coal	12,500	Btu/lb	1.0 %	12 T/hr	3.0×10^8
No. 6 Diesel Oil	152,000	Btu/gal	0.77 %	1974 T/hr	3.0×10^8

(1) Flolite would be mainly used during start-up of kiln operations and during periods when raw materials feed is stopped and kiln temperature must be maintained, and Flolite is normally used only as a substitute for coal. In cases where Flolite and coal are used concurrently, the maximum heat input rate will not exceed 3.0×10^8 Btu/hr.

(2) Values shown are approximate.

EXHIBIT III-1
FLOLITE MANUFACTURER'S DATA

FLOLITE

TYPICAL SPECIFICATIONS

GENERAL - Flolite has the normal specifications of #5 fuel oil; however, it has a constant viscosity designed to meet the needs of individual customers.

<u>ANALYSIS</u>	<u>TYPICAL SPECIFICATIONS</u>
API GRAVITY @ 60°F	18 - 29
SULFUR % WT	1.0% Maximum
B S & W	1.0% Maximum
WATER BY DISTILLATION	1.0% Maximum
BTU/GAL	Approx. 145,000 +
VANADIUM	50 - 100 PPM
TOX	Below 500 PPM
PCB's	Below detectable limits (0.5 PPM)
CCR	1.5%
ASPHALTENES	0.5%
METALS	Below EP toxicity Maximum levels.

7-24-89

BEST AVAILABLE COPY



INTERNATIONAL PETROLEUM CORPORATION

October 25, 1989

Cross/Tessitore & Associates, P.A.
Attn: Mr. Greg Gonzales
4763 South Conway Road, Suite F
Orlando, Florida 32812

Subject: International Petroleum Corporation "Flolite"

Dear Mr. Gonzales:

Our "Flolite" product is a blend of "on-specification" re-refined oil and virgin fuel oils. We do not sell any off specification product. The precise formulation is proprietary information; however, virgin fuel normally constitutes less than 50% of the blended product. I am attaching a release from the Federal E.P.A. which states their position that our finished product is equivalent to virgin fuel oils.

The feedstock for our finished product is predominantly used motor oils. This feedstock undergoes four filtration steps, an atmospheric distillation process and a vacuum distillation process.

A copy of a certified analysis of our finished product is attached and is indicative of our typical specifications for finished product.

A copy of the D.E.R. approval for use of our product is also attached.

The following comments are in response to your specific questions.

1. "Flolite" is "on-spec" product and has the physical characteristics of # 5 oil.
2. "BS&W" refers to "Bottom Sediment and Water". This is a normal test for fuel oils. Product is usually heavily discounted if it exceeds 1.0% because it provides less BTU/gallon and is more difficult to burn. The lowest percentage is the best product. "CCR" is an abbreviation for "Conradson Carbon Residue". This is a frequently used test where a specific amount of fuel is heated and burned for a specified time. The unburned portion is the carbon residue. Most # 5 oils run in the 7 - 12% range. The lowest % is the best product.

105 South Alexander Street, Plant City, Florida 33566
Area Code (813) 229-1739 Fla WATS 800-282-9585



INTERNATIONAL PETROLEUM CORPORATION

Cross/Tessitore & Associates, P.A.

Page 2

3. PNA's are present in all fuel oils at varying levels. The cost of the test to determine precise percentages is very expensive and requires very elaborate, complex equipment and highly trained personnel. Heavy hydro-treating, which is sometimes used in processing oils, reduces but does not eliminate PNA's. These hydro-treated oils usually become lubricating oils and make up part of our feedstock. Our distillation processes remove the more volatile materials and a high percentage of aromatics which causes the PNA content of our re-refined product to be lower than virgin oils.

Sincerely,

Don Van Sickle
Director of Marketing

DVS:pw

Encl.



INTERNATIONAL PETROLEUM CORPORATION

MATERIAL SAFETY DATA SHEET

INTERNATIONAL PETROLEUM CORPORATION FUEL OIL - FLOLITE

DANGER! PROLONGED AND REPEATED CONTACT WITH SKIN
CAN BE HARMFUL
COMBUSTIBLE
KEEP OUT OF REACH OF CHILDREN

TYPICAL COMPOSITION

A mixture of Petroleum Residual (atmospheric or vacuum) and Cutter Stocks (lt. cycle oils, diesel, jet or re-refined oil) blended to meet specifications.

EXPOSURE STANDARD

No OSHA exposure standard of Threshold Limite Value has been established for this material. However, due to the possible carcinogenic effect, exposure should be reduced to the lowest feasible leve.

PHYSIOLOGICAL & HEALTH EFFECTS

EMERGENCY & FIRST AID PROCEDURES

Expected to cause no more than minor irritation.

Eyes

Wash eyes with fresh water for eye at least 15 minutes. If irritation continues, see a doctor.

Not expected to be irritating to the skin but minor irritation may be noted following prolonged or frequently repeated contact. Prolonged or repeated contact with the skin may eventually lead to skin cancer. See additional Health Data.

Skin

Remove and launder contaminated clothing. Wash thoroughly with soap and water following skin contact.

Not expected to be acutely toxic by inhalation.

Inhalation

Since this material is not expected to be an inhalation problem, no first aid procedures are required.

Not expected to be acutely toxic by ingestion.

Ingestion

If swallowed, give a large amount of water to drink, make person vomit and call a doctor.

BEST AVAILABLE COPY

This product may contain significant amounts of polynuclear aromatic hydrocarbons (PNA's) which have been shown to cause skin cancer after prolonged and frequent contact with the skin of test animals. Brief or intermittent skin contact with this product is not expected to have serious effects if the skin is washed off. While skin cancer is unlikely to occur in human beings following use of this product, skin contact should be reduced to a minimum.

SPECIAL PROTECTIVE INFORMATION

Eye Protection: Chemical safety goggles must be worn if there is a likelihood of exposure.
Skin Protection: When handling this material, wear impervious protective cloths, which may include neoprene or rubber gloves, apron, overshoes, goggles and complete facial protection.

Respiratory Protection: This material may be an inhalation hazard and unless ventilation is adequate, the use of an approved respirator is recommended.

Ventilation: Use this material only in well ventilated areas.

Other: If eye or skin contact does occur, washing facilities for eyes and skin should be available nearby.

FIRE PROTECTION

Liquid evaporates and forms vapor which can catch fire and burn with explosive violence. Invisible vapor spreads easily and can be set on fire by many sources such as pilot lights, welding equipment, and electrical motors and switches. Fire hazard is greater as liquid temperature raises above 85 F.

Flash Point: (P-M) 55 C (Min.)

Autoignition Temp.: NDA

Flammability Limits: NDA

Extinguishing Media: CO₂, Dry Chemical, Foam, Water Spray.

Special Fire Fighting Procedures: For fires involving this material, do not enter any enclosed or confined fire space without proper protective equipment, including self-contained breathing apparatus. See Hazardous Decomposition products. Read the entire bulletin.

The above information is based on data of which we are aware and is believed to be correct as of the date hereof. Since the information contained herein may be applied under conditions below our control and with which we may be unfamiliar and since data made available subsequent to the data hereof may suggest modifications of the information, we do not assume any responsibility for the results of its use. This information is furnished upon the condition that the person receiving it shall make his own determination of the suitability of the material for this particular purpose.

Environment Impact: This material may be classed as a water pollutant and should be kept out of sewage and drainage systems and all bodies of water.

Precautions if Material is Released or Spilled: Eliminate all open flames in vicinity of spill or released vapor. Clean up spills as soon as possible. Absorb large spills with absorbent clay, diatomaceous earth or other suitable material.

Waste Disposal Methods: Place contaminated materials in disposable containers and bury in an approved dumping area.

REACTIVITY DATA

Stability (Thermal, Light, Etc.): Stable.

Incompatibility (Materials to avoid): May react with strong oxidizing materials.

Hazardous Decomposition Products: Normal combustion forms carbon dioxide and water vapor and oxides of sulfur; incomplete combustion can produce carbon monoxide.

Hazardous Polymerization: Will not occur.

PHYSICAL PROPERTIES

Solubility: Insoluble in water; miscible with hydrocarbons.

Appearance (Color, Odor, etc.): Black liquid.

Boiling Point: NDA

Melting Point: n/a

Gravity (API): NDA

Vapor Pressure (mm Hg & Temp.): NDA

Vapor Density (Air=1): NDA

Percent Volatile (Volume %): NDA

Evaporation (=1): NDA

Pour Point: Below +6 C

Viscosity: 4.4 to 38.0 cSt @ 50 C
45 to 300 SUS @ 100 F

% Sulfur: 1.9 (Max.)

n/a = Not Applicable

NDA = No Data Available

SPECIAL PRECAUTIONS

DO NOT USE OR STORE near flame, sparks or hot surfaces. USE ONLY IN WELL VENTILATED AREA.

TABLE V-1
PROCESS DATA

Kiln Feed Rate	130 T/hr
Clinker Production Rate	79.6 T/hr
Maximum Heat Input	3.0×10^8 Btu/hr

EMISSIONS CALCULATIONS

PARTICULATE

The anticipated emissions rate for particulate is the same as the currently permitted level. In order to determine the efficiency of the air pollution control device, the potential emission loading to the baghouse is calculated based on an emissions factor from the EPA Guidance Document AP-42, Table 8.6-1.

Calculation of Allowable Emissions:

Allowable Emissions = 36.0 lb/hr
(Permit A027-169616)

Calculation of Potential Emissions:

Potential Emissions = 36.0 lb/hr
= 157.7 T/yr

Calculation of Control Device Removal Efficiency:

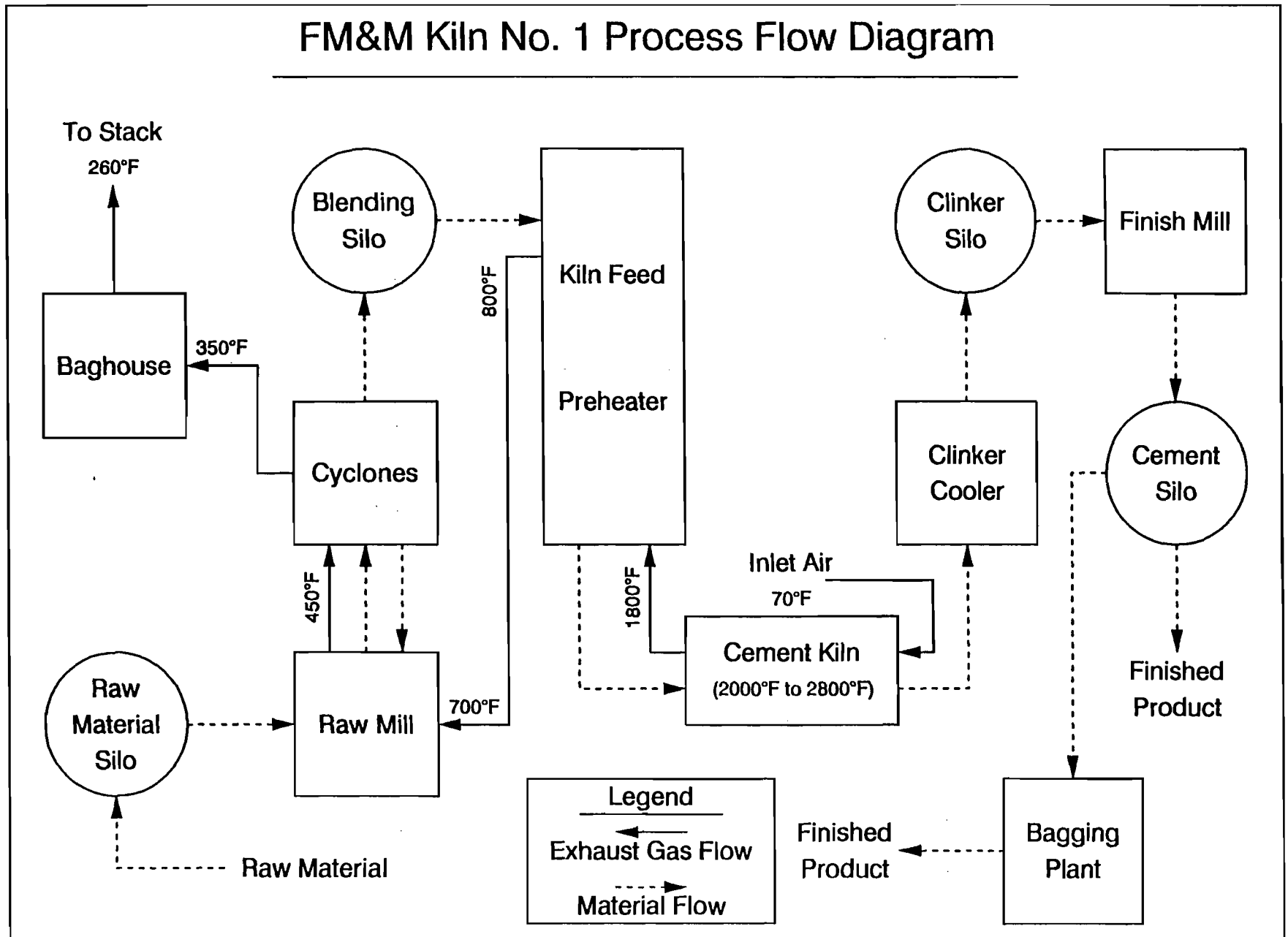
Uncontrolled Emissions Factor = 245.0 lb/ton clinker

Production Rate = 79.6 T/hr clinker

Potential Emission Loading to Baghouse = (245 lb/ton) x (79.6 T/hr)
= 19,502.0 lb/hr

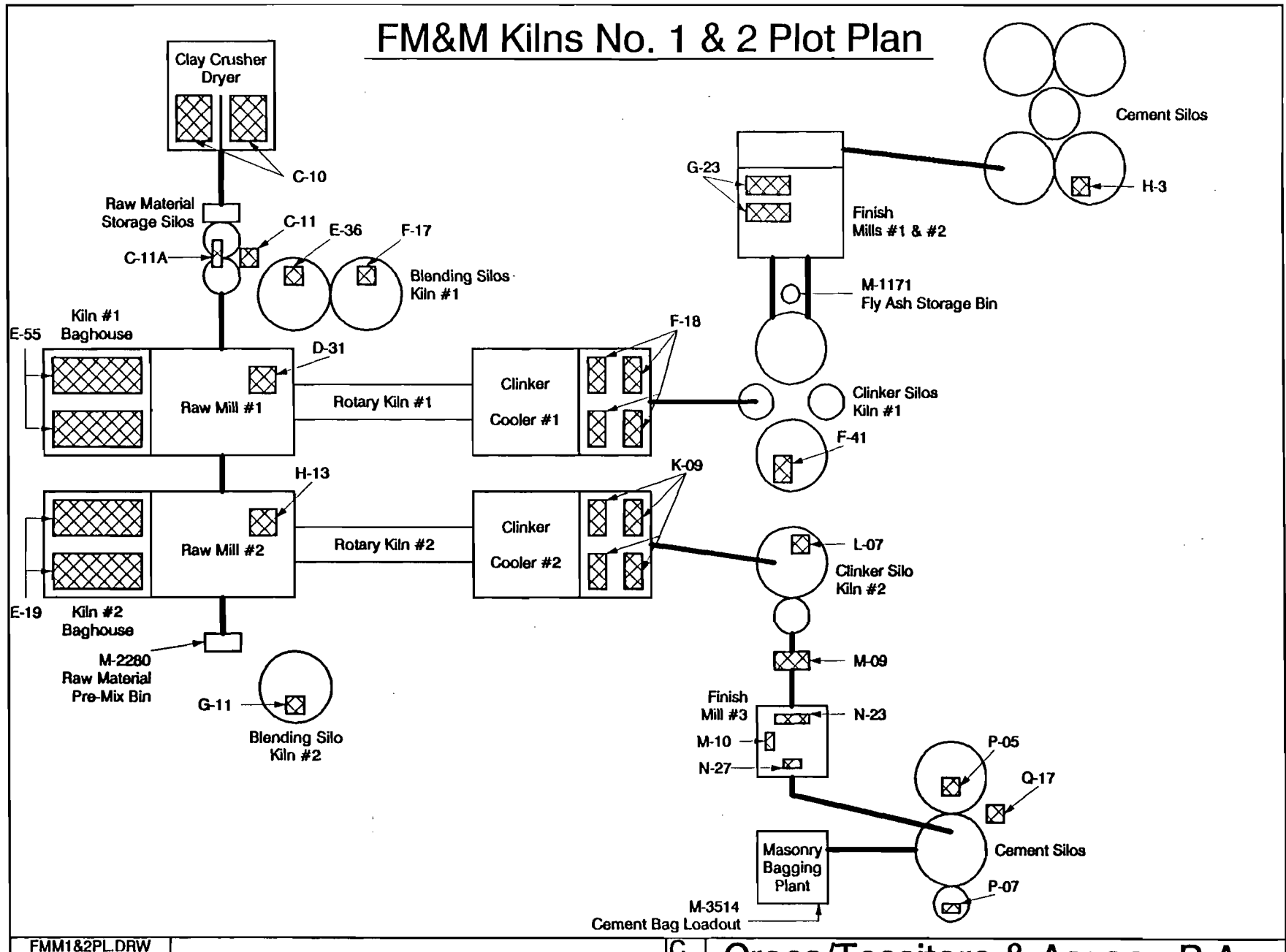
Control Device Removal Efficiency = (19,502 lb/hr - 36.0 lb/hr)
- (19,502 lb/hr)
= 99.8%

FIGURE V-1



25

FIGURE V-3



27

FMM1&2PL.DRW

VENDOR NO.	INVOICE DATE	DOCUMENT NO.	REMARKS	GROSS	DISCOUNT	NET AMOUNT
18126	9 20 90	90228	FLOLITE PERMIT	200.00	.00	200.00
	9 20 90	23728	** TOTAL	200.00	.00	200.00

DETACH BEFORE DEPOSITING

FLORIDA MINING & MATERIALS
A SOUTHDOWN COMPANY

P.O. BOX 6
BROOKSVILLE, FLORIDA 34605-0006

United Bank of Grand Junction, N.A.
GRAND JUNCTION, COLORADO 81501
PAYABLE IF DESIRED THROUGH
WELLS FARGO BANK, N.A.

FLORIDA MINING & MATERIALS
A SOUTHDOWN COMPANY
P.O. BOX 6
BROOKSVILLE, FLORIDA 34605-0006

82-91
1021

No. 023728

DATE OF CHECK	CHECK NO.	AMOUNT OF CHECK
9 20 90	23728	*****200.00

PAY TO THE ORDER OF
FLA DEPT OF ENVIRONMNTL REGLTN
4520 OAK FAIR BLVD
TAMPA FL 33610

FLORIDA MINING & MATERIALS

James L. Anderson
Karen A. Tuttle



BEST AVAILABLE COPY

FEDERAL
QUESTIONS? CALL 800-238-5355 TOLL FREE.

AIRBILL PACKAGE TRACKING NUMBER 6828077506

6828077506

RECIPIENT'S COPY

Date: 9/24/90

From (Your Name) Please Print: e Tessitore	Your Phone Number (Very Important): (407) 891-1484	To (Recipient's Name) Please Print: Mr. Bruce Mitchell	Recipient's Phone Number (Very Important): (904) 488-
Company: ISS-TESSITORE & ASSOCIATES	Department/Floor No.:	Company: FOUR FEDEX	Department/Floor No.:
Street Address: 13 S CONWAY RD STE F	City: LANDO FL	Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.): 2600 Blair Stone Road	City: Tallahassee FL
State: FL	ZIP Required: 32012	State: FL	ZIP Required: 32399-24

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)
182

IF HOLD FOR PICK-UP, Print FEDEX Address Here

Street Address:
City:
State:
ZIP Required:

PAYMENT 1 Bill Sender 2 Bill Recipient's FedEx Acct No 3 Bill 3rd Party FedEx Acct. No. 4 Bill Credit Card
5 Cash

<p>4 SERVICES (Check only one box)</p> <p>Priority Overnight Service (Delivery by next business morning!)</p> <p>Standard Overnight Service (Delivery by next business afternoon!)</p> <p>11 <input type="checkbox"/> YOUR PACKAGING 51 <input type="checkbox"/></p> <p>16 <input type="checkbox"/> FEDEX LETTER* 56 <input type="checkbox"/> FEDEX LETTER*</p> <p>12 <input type="checkbox"/> FEDEX PAK* 52 <input type="checkbox"/> FEDEX PAK*</p> <p>13 <input type="checkbox"/> FEDEX BOX 53 <input type="checkbox"/> FEDEX BOX</p> <p>14 <input type="checkbox"/> FEDEX TUBE 54 <input type="checkbox"/> FEDEX TUBE</p> <p>Economy Service (formerly Standard Air) (Delivery by second business day!)</p> <p>30 <input type="checkbox"/> ECONOMY SERVICE</p> <p>Heavyweight Service (for Extra Large or any Package over 150 lbs.)</p> <p>70 <input type="checkbox"/> HEAVYWEIGHT**</p> <p>80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT**</p> <p>† Delivery commitment may be later in some areas. **Declared Value Limit \$100. **Call for delivery schedule.</p>	<p>DELIVERY AND SPECIAL HANDLING</p> <p>1 <input type="checkbox"/> HOLD FOR PICK-UP (if in Box H)</p> <p>2 <input checked="" type="checkbox"/> DELIVER WEEKDAY</p> <p>3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available for all locations)</p> <p>4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) (CSS not available for Dangerous Goods Shipments)</p> <p>5 <input type="checkbox"/> CONSTANT SURVEILLANCE SVC. (CSS) (Extra charge) (Release Signature Not Applicable)</p> <p>6 <input type="checkbox"/> DRY ICE Lbs</p> <p>7 <input type="checkbox"/> OTHER SPECIAL SERVICE</p> <p>8 <input type="checkbox"/></p> <p>9 <input type="checkbox"/> CALIFORNIA PICK-UP</p> <p>10 <input type="checkbox"/></p> <p>11 <input type="checkbox"/></p> <p>12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)</p>	<p>PACKAGES WEIGHT YOUR DECLARED VALUE</p> <p>12 Total Total Total</p>	<p>Emp. No. _____ Date _____</p> <p><input type="checkbox"/> Cash Received</p> <p><input type="checkbox"/> Return Shipment</p> <p><input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del <input type="checkbox"/> Chg. To Hold</p> <p>Street Address _____</p> <p>City _____ State _____ Zip _____</p> <p>Received By: X</p> <p>Date/Time Received _____ FedEx Employee No. _____</p>	<p>Federal Express U.S. Basic Charges</p> <p>Declared Value Charge</p> <p>Other _____</p>
			<p>5 Release Signature: _____</p>	<p>U.S. MAIL PERMITTED</p>

file copy



CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

October 30, 1989

RECEIVED

NOV 1 1989

DER-BAQM

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

SUBJECT: Florida Mining and Materials Kiln No. 1
Permit No. A027-89814 October 4, 1989
Correspondence Letter.
C/TA# F03.182

Dear Mr. Fancy:

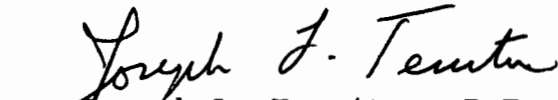
This correspondence is to address your letter of October 4, 1989 concerning the subject source. In response to your request for additional information, the following is submitted:

1. The original construction permit number for Kiln No. 1 is AC27-2255 (see Attachment 1).
2. An explanation of "BS&W" and "CCR" in the Flolite specification is as follows: 1) "BS&W" refers to bottom sediment and water; 2) "CCR" is an abbreviation for Conradson Carbon Residue (see Attachment 2). Also, the identity and levels of all known metals contained in Flolite are listed in Attachment 3.
3. A list of all known Polynuclear Aromatic Hydrocarbons (PNA's) contained in the Flolite and their levels is addressed in Attachment 2. Item 3 of Attachment 2 states the PNA values in Flolite are less than PNA values in virgin oils.

It should be noted that the Flolite oil will be utilized as a supplemental fuel source for the start up and warming of the kiln only. The kiln will operate in this mode approximately 250 hr/yr. Also Flolite is an "on spec" product and considered equivalent to No. 5 virgin fuel oil.

Should you have any questions, please do not hesitate to call.

Sincerely,


Joseph L. Tessitore P.E.
Vice President

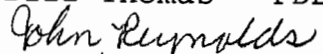
JLT/bdf

ENC. a/s

CC: Henry Andre - FM&M

Bill Thomas - FDER Tallahassee

Bill Thomas - FDER Tampa


CHF/BT



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

October 4, 1989

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: Permit Modification to Burn Flolite in Kiln No. 1
AO 27-89814

This is to provide notice that the following additional information is required for preliminary review of the above application received on September 5, 1989:

1. The original construction permit number for kiln No. 1.
2. An explanation of "B S & W" and "CCR" in the Flolite Specification and the identity and levels of all known metals contained in the Flolite.
3. A list of all known polynuclear aromatic hydrocarbons (PNA's) contained in the Flolite and their levels.

This additional information is required in order to process your application. If you have any questions, please call John Reynolds at (904)488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Bureau of Air Regulation

CHF/JR/t

cc: G. Richardson, SW District

P 938 762 701

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

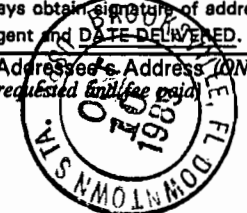
(See Reverse)

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: 10-4-89 Permit: AO 27-	

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 the 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)

3. Article Addressed to: Mr. Henry E. Andre, Vice Pres. Florida Mining & Materials P. O. Box 6 Brooksville, FL 34605-0006		4. Article Number P 938 762 701	
		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	
		Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Address X		8. Addressee's Address (ONLY if requested and fee paid) 	
6. Signature - Agent X <i>[Signature]</i>			
7. Date of Delivery			



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

APPLICANT:

Florida Mining & Materials Corp.
P.O. Box 6
Brooksville, Fla. 33512

PERMIT/CERTIFICATION
NO. A027-20213

COUNTY: Hernando

PROJECT: Kiln Baghouse
E-55

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the operation of the rotary kiln preheater exhaust gases baghouse (E-55).

Located at U.S. Hwy 98, N.W. of Brooksville, Hernando County.

UTM: 17-356.2E 3103.7N

Replaces Permit NO: AC27-2255 NEDS NO: 0010 Point ID: 03

Expires: August 7, 1984

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

Appl. Name: Florida Mining & Materials Corp.

Project: Kiln Baghouse E-55

Page 3 of 4 of Permit No.: AO27-20213

Revised: August 27, 1979

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- () Determination of Best Available Control Technology (BACT)
- () Determination of Prevention of Significant Deterioration (PSD)
- () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

SPECIFIC CONDITIONS:

1. Submit for this facility, each calendar year, on or before March 1, an emission report for the preceding calendar year containing the following information as per Chapter 17-4.14, F.A.C.
 - (A) Annual amount of materials and/or fuels utilized.
 - (B) Annual emissions (note calculation basis).
 - (C) Any changes in the information contained in the permit application.
2. Test for particulate emissions at intervals of 12 months from date of 9/9/78 and submit a copy of the test data to the District Engineer of this agency within fifteen days of such testing. (Chapter 12-2.08(1)F.A.C.
3. Tests for particulates shall be conducted in the following manner:
 - A. Four baghouse exits will be selected at random by State of Florida personnel in advance of testing. If the testing requires more than 72 hours, exits originally selected may be replaced by other exits.
 - B. Total gas flow rate to the baghouse will be accurately determined before and after each test run. Each test run will consist of one complete sample from one exit.
 - C. Each test run will consist of a 48 point test traverse (or less if a longer stack extension is used, Method 1 will be used to determine the number of test points).
 - D. Each test run will consist of two complete baghouse cycles of 56 minutes each for a total of 112 minutes of sampling time for each run. Sampling will be discontinued during the four minute cleaning cycle.

Appl Name: Florida Mining & Materials Corp.
Project: Kiln Baghouse E-55
Page 4 of 4 of Permit NO: AO27-20213
Revised: August 27, 1979

E. The particulate emissions in pounds per hour will be determined from each stack as well as the kiln feed in tons per hour during the test. The emissions in pounds per ton of kiln feed will be determined as follows:

$$E = \frac{(M)}{(P)} \frac{(V_1)}{(V_2)}$$

E = Particulate emissions, lb/ton kiln feed

M = Particulate emissions from the compartment tested, lb/hr.

P = Kiln feed, tons/hr (dry basis)

V₁ = Total gas flow rate determined at inlet, DSCFH

V₂ = Measured gas flow rate from sampled compartment, DSCFH

V₁/V₂ = not to exceed 17.5

The emissions will be the average of the results (lb/ton kiln feed) from the four test runs

F. All other conditions as per process and test Methods 1, 2, 3, and 5 remain in effect.

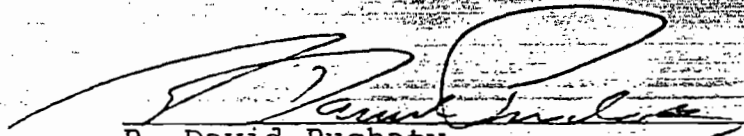
G. If reasonable doubt of compliance exists after the tests are conducted using the alternate procedure, tests will be ordered incorporating the particulate emissions from all baghouse exits.

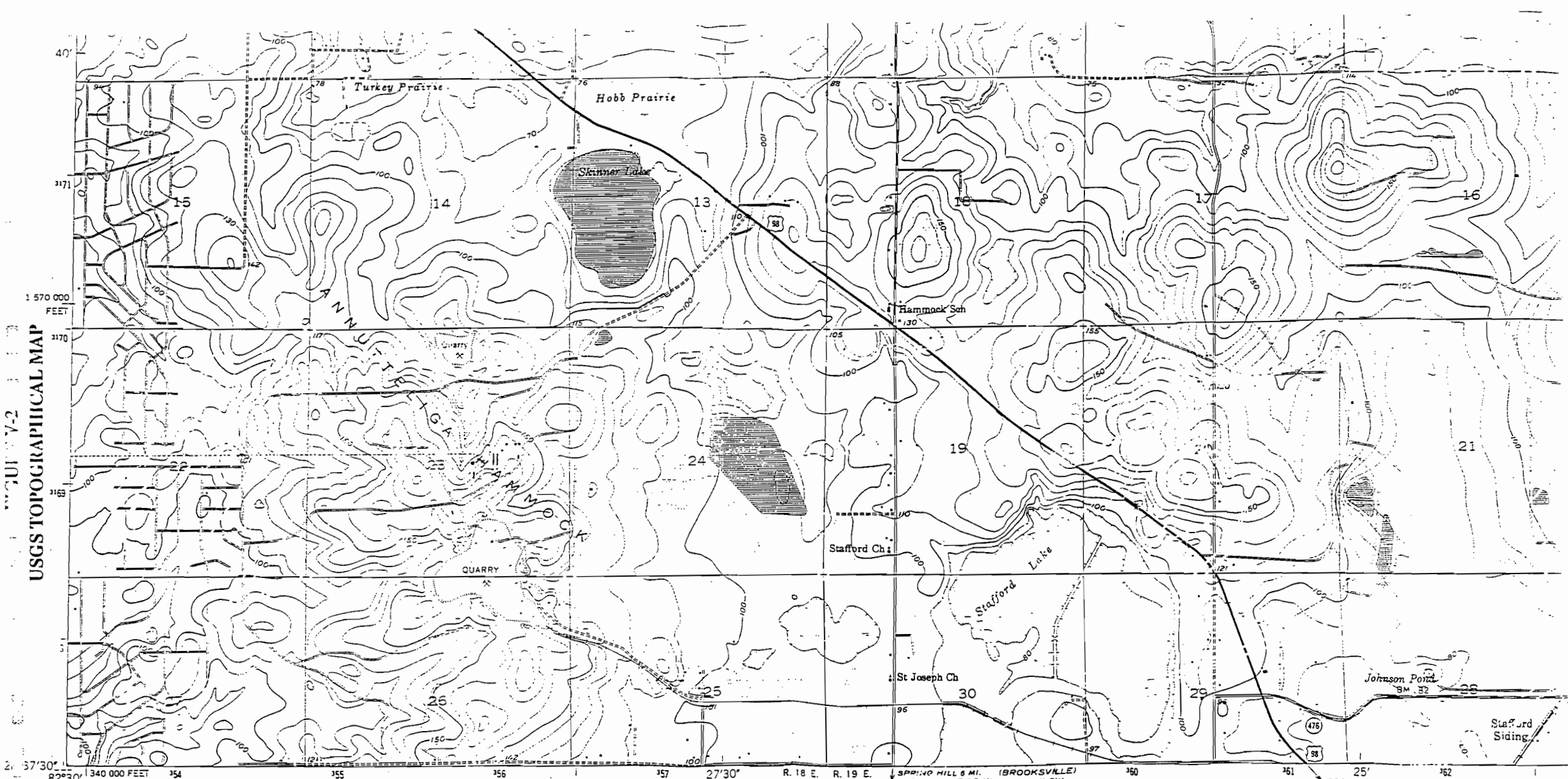
H. Compliance must be met at all times.

4. Test each emission point for plume density (visible emissions) when stack tests are being conducted. No stack shall exceed 10% opacity.

Expiration Date: August 7, 1984 Issued this 13th of August 1979 Revised August 27, 1979

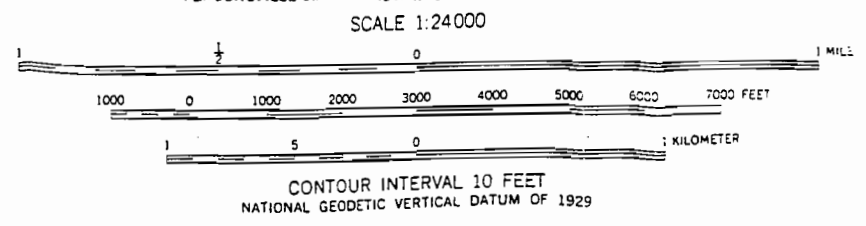
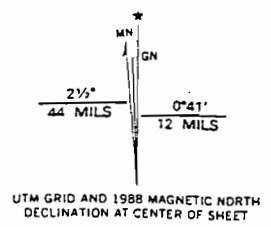
STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION


P. David Puchaty
District Manager



USGS TOPOGRAPHICAL MAP

Mapped, edited, and published by the Geological Survey
 Control by USGS and USC&GS
 Topography from aerial photographs by Kelsh plotter
 Aerial photographs taken 1951. Field check 1954
 Polyconic projection. 1927 North American datum
 10,000-foot grid based on Florida coordinate system,
 west zone
 1000-meter Universal Transverse Mercator grid ticks,
 zone 17, shown in blue
 To place on the predicted North American Datum 1983,
 move the projection lines 27 meters south and
 15 meters west as shown by dashed corner ticks
 There may be private inholdings within the boundaries of
 the National or State reservations shown on this map



THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
 FOR SALE BY U. S. GEOLOGICAL SURVEY
 DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
 A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple compiled from aerial photographs
 other sources. This information not field checked.

RECEIVED OCT 07 1989



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

October 4, 1989

*Gry: Please contact
Hank & handle*

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: Permit Modification to Burn Flolite in Kiln No. 1
AO 27-89814

This is to provide notice that the following additional information is required for preliminary review of the above application received on September 5, 1989:

1. The original construction permit number for kiln No. 1.
2. An explanation of "B S & W" and "CCR" in the Flolite Specification and the identity and levels of all known metals contained in the Flolite.
3. A list of all known polynuclear aromatic hydrocarbons (PNA's) contained in the Flolite and their levels.

This additional information is required in order to process your application. If you have any questions, please call John Reynolds at (904)488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Bureau of Air Regulation

CHF/JR/t

cc: G. Richardson, SW District

ATTACHMENT 1

STATE OF FLORIDA
DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT

FOR Florida Mining and Materials Corp.
P.O. Box 23965
Tampa, Florida 33622

PERMIT NO. AC 27-2255

DATE Dec. 18, 1973

PURSUANT TO THE PROVISION OF SECTION 403.061(16) OF CHAPTER 403, FLORIDA STATUTES, AND CHAPTER 17.4, FLORIDA ADMINISTRATIVE CODE, THIS PERMIT IS ISSUED TO:
T. E. Bronson, President

FOR THE CONSTRUCTION OF:
Cement plant rotary kiln, preheater and dryer with dust control unit E-55

LOCATED AT: NW of Brooksville, Hernando Co.
UTM: 17-356.200E, 3170.367N

IN ACCORDANCE WITH THE APPLICATION DATED June 27, 1973

AND IN CONFORMITY WITH THE STATEMENTS AND SUPPORTING DATA ENTERED THEREIN, ALL OF WHICH ARE FILED WITH THE DEPARTMENT AND ARE CONSIDERED A PART OF THIS PERMIT.

THIS PERMIT SHALL BE EFFECTIVE FROM THE DATE OF ITS ISSUANCE UNTIL March 1, 1976 AND SHALL BE SUBJECT TO ALL APPLICABLE LAWS OF THE STATE AND THE RULES AND REGULATIONS OF THE DEPARTMENT.

CHIEF, BUREAU OF PERMITTING

T. E. Hunnicutt
T. E. HUNNICUTT
PROFESSIONAL ENGINEER

EXECUTIVE DIRECTOR

STATE OF FLORIDA

DEPARTMENT OF POLLUTION CONTROL

CONSTRUCTION PERMIT PROVISOS

BEST AVAILABLE COPY

AIR POLLUTION SOURCES

Permit No. AC27-2252-AC27-2262 Date: 12/18/73

- [X] 1. Construction of this installation shall be completed by January 1, 1976.
- [X] 2. This installation shall be operated by a competent and qualified person. Operations shall be conducted according to the best accepted practices and the recommendations of the Department of Pollution Control.
- [X] 3. This construction permit is issued with the understanding that the owner may need to comply with county, municipal, or other local regulations prior to construction.
- [X] 4. The applicant shall continue the retention of the engineer of record for the inspection of the construction of this project. Upon completion the engineer shall inspect for conformity to construction permit applications and associated documents. A report of such inspection shall be submitted by the engineer to the Department of Pollution Control for consideration toward the issuance of an operation permit. Notification of the pending completion of this project shall be transmitted in writing to the Department by the engineer approximately two weeks before the completion of construction.
- [X] 5. This construction permit expires on March 1, 1976 following an initial period of operation for appropriate testing to determine compliance with the Rules of the Florida Pollution Control Board.
- [X] 6. Detailed plans and specifications for this report shall be available upon request by the Department of Pollution Control.
- [X] 7. This facility shall be tested for total particulate emissions within 60 days after it is placed in operation. These test results are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC West Central Florida Regional Office P.O. Box 9205, Winter Haven, Florida 33880.
- [] 8. The operation of this installation shall be observed for visible emissions in accordance with Method 9 - Visible Determination of the Opacity of Emissions from Stationary Sources (Federal Register, December 23, 1971). The observation results are required prior to our issuance of an operation permit, and shall be submitted in duplicate to the DPC West Central Florida Regional Office,
- [] 9. Stack sampling for total particulate or other contaminant emissions shall be conducted if found by the DPC West Central Florida Regional Office to be necessary as a basis for the issuance of an operation permit.
- [X] 10. Satisfactory ladders, platforms, and other safety devices shall be provided/available as well as necessary ports to facilitate the carrying out of an adequate sampling program.

Page Two

- [] 11. The following items are required prior to our issuance of an operation permit in addition to the engineer of record's report of inspection:
- (a) An emission report for total particulates and sulfur oxides based upon actual operations.
 - (b) A tabular summary of actual records of frequencies and durations of soot blowing as well as boiler blowdown characteristics and disposal practices.

These items are required prior to our issuance of an operation permit and shall be submitted in duplicate to the DPC _____ Florida Regional Office, _____

- [xx] 12. There shall be no discharges of liquid effluents or contaminated runoff from the plant site.
- xxx] 13. All fugitive dust generated at this site shall be adequately controlled.
- (X) 14. A network for monitoring total suspended particulates around the plant site shall be installed at least three months prior to plant startup. The number and location of monitors shall be approved by the Department.
- (X) 15. All equipment shall be maintained so as to minimize air pollutant emissions from the plant. The control equipment maintenance schedule shall be reviewed and approved by the Department before an operating permit is issued.
- (X) 16. If air quality standards are violated as a result of this cement plant's operation as specified in the permit application, stack heights shall be increased to reduce ambient air pollution to acceptable levels.

ATTACHMENT 2

RECEIVED OCT 25 1989



INTERNATIONAL PETROLEUM CORPORATION

October 25, 1989

Cross/Tessitore & Associates, P.A.
Attn: Mr. Greg Gonzales
4763 South Conway Road, Suite F
Orlando, Florida 32812

Subject: International Petroleum Corporation "Flolite"

Dear Mr. Gonzales:

Our "Flolite" product is a blend of "on-specification" re-refined oil and virgin fuel oils. We do not sell any off specification product. The precise formulation is proprietary information; however, virgin fuel normally constitutes less than 50% of the blended product. I am attaching a release from the Federal E.P.A. which states their position that our finished product is equivalent to virgin fuel oils.

The feedstock for our finished product is predominantly used motor oils. This feedstock undergoes four filtration steps, an atmospheric distillation process and a vacuum distillation process.

A copy of a certified analysis of our finished product is attached and is indicative of our typical specifications for finished product.

A copy of the D.E.R. approval for use of our product is also attached.

The following comments are in response to your specific questions.

1. "Flolite" is "on-spec" product and has the physical characteristics of # 5 oil.
2. "BS&W" refers to "Bottom Sediment and Water". This is a normal test for fuel oils. Product is usually heavily discounted if it exceeds 1.0% because it provides less BTU/gallon and is more difficult to burn. The lowest percentage is the best product. "CCR" is an abbreviation for "Conradson Carbon Residue". This is a frequently used test where a specific amount of fuel is heated and burned for a specified time. The unburned portion is the carbon residue. Most # 5 oils run in the 7 - 12% range. The lowest % is the best product.



INTERNATIONAL PETROLEUM CORPORATION

Cross/Tessitore & Associates, P.A.

Page 2

3. PNA's are present in all fuel oils at varying levels. The cost of the test to determine precise percentages is very expensive and requires very elaborate, complex equipment and highly trained personnel. Heavy hydro-treating, which is sometimes used in processing oils, reduces but does not eliminate PNA's. These hydro-treated oils usually become lubricating oils and make up part of our feedstock. Our distillation processes remove the more volatile materials and a high percentage of aromatics which causes the PNA content of our re-refined product to be lower than virgin oils.

Sincerely,

Don Van Sickle
Director of Marketing

DVS:pw

Encl.

ATTACHMENT 3



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

January 23, 1989

Mr. A. M. Malatino, President
International Environmental Services, Inc.
105 S. Alexander Street
Plant City, Florida 33566

Dear Mr. Malatino:

In reference to the analysis (enclosed) on the re-refined oil submitted on January 13, I do not have any objections to the use of this product as a phosphate flotation oil.

Phosphate companies using this re-refined oil annually would not be required to register with the Department as a used oil collection and recycling facility. Also, annual reports and recordkeeping would not be required of them.

If you have any further questions or comments, please let me know.

Sincerely,

David H. Kelley
Environmental Specialist
Bureau of Waste Planning
and Regulation

DHK/ps

Enclosure

cc: Clabe Polk

INTERNATIONAL ENVIRONMENTAL SERVICES, INC.

105 South Alexander St. • Plant City, Florida 33566 • (813) 754-2373
Tampa (813) 229-0879 • Miami Office 1-800-537-9875 • FAX (813) 754-3789
Florida Wats 1-800-762-1104

BEST AVAILABLE COPY



CERTIFIED ANALYSIS

TO: INTERNATIONAL ENVIRONMENTAL SERVICES PROJECT NO. IES #5 OIL
ATTN: MR. TONY MALATINO
105 SOUTH ALEXANDER STREET
PLANT CITY, FL. 33566

SAMPLED BY: IES

DATE COLLECTED: 1-04-89

IDENTIFICATION: RE-REFINED OIL

DATE COMPLETED: 1-10-89

API GRAVITY AT 60 DEGREES F	25-28
SULFUR	0.50%
VISCOSITY SSU AT 100 DEGREES F	240
POUR POINT, DEGREES F	0 DEGREES F
ASPHALTINES	<1.0%
SEDIMENT BY EXTRACTION	TRACE
WATER BY DISTILLATION %	TRACE
TOTAL BOTTOM SEDIMENT AND WATER	1.0% MAX
CADMIUM PPM	<0.3
LEAD PPM (LEACHABLE) BY E. P. TOXICITY	<5.0
ARSENIC PPM	<1.0
CHROMIUM PPM	<1.3
POLYCHLORINATED BIPHENYLS (PCB'S)	BDL*
FLASHPOINT	150 DEGREES MIN

* BELOW DETECTION LIMIT (1.0 PPM)

Results expressed in mg/l (ppm) ug/l (ppb)
 mg/kg (ppm) ug/kg (ppb)

State of Florida Certification: EB4160 and HRS 8430B

METHODS:

"Standard Methods for the Examination of Water and Wastewater", Latest Edition, APHA, AWWA, and WPCF and/or other EPA approved methods which meet FDER protocol, unless otherwise designated.

QUALITY CONTROL:

Quality Assurance Project Plan No. 870319G.
Quality Assurance Quality Control No. 87319G.

Certified by:

Chemist

ATTACHMENT 4

NOTE NEXT TO LAST PARAGRAPH
ON PAGES 2 AND 3. *02*INFORMATION BULLETIN FOR PUBLIC RELEASE:
EPA CONCERNS ABOUT THE USED OIL RECYCLING SYSTEM

The Environmental Protection Agency (EPA) is becoming increasingly concerned about disruptions in the used oil recycling system that are occurring because of the fall in virgin fuel oil prices and because of misunderstanding and confusion about EPA's regulations.

There are only a few presently effective requirements for used oil management. Used oil generators should not mix spent solvents with used oils. These mixtures must be managed as hazardous wastes. Used oil fuel dealers must register with EPA. They may sell off-specification used oil fuels (used oil fuels with high metals concentrations) only to industrial burners. On-specification used oil fuels may be sold to anyone. Off-specification used oil burners must register with the Agency.

Background

In 1980 and 1984 Amendments to the Resource Conservation and Recovery Act (RCRA), Congress directed EPA to consider regulating used oils to protect human health and the environment. At the same time, however, EPA must consider the impacts of regulations on used oil recycling, on small businesses, and small generators. EPA has divided the used oil regulatory program into three stages.

(1) EPA has begun regulation of used oil recycling with a rule to

- discourage mixing hazardous wastes, such as spent solvents, into used oils; and
- ban the combustion of used oil fuels with high metals concentrations in non-industrial facilities, such as schools and apartments.

This rule was proposed on January 11, 1985; promulgated on November 29, 1985; and became fully effective on May 29, 1986.

withdrawn
EPA
11/86 (2) We have also begun the next stage of regulating the used oil system with the proposed listing and management standards published on November 29, 1985. EPA is now evaluating the many public comments received in response to this notice (and a supplementary March 10, 1986 notice). We expect to make final decisions this fall. These final rules will be effective six months after publication.

delayed (3) In a final stage, EPA expects to control combustion devices that burn used oil fuels with high metals content. The rules are expected to be proposed this fall, at the earliest. Final decisions should be completed by the end of 1987. Again, final rules will be effective six months after that.

Current Problems

There are two major problems in the used oil recycling system. First, generators are confused about the status of used oil. Many are surprised that they often must pay to have used oil hauled away. Second, industrial burners are confused about the status of used oil. Many have stopped burning used oil.

Used Oil Generators

Used oil is commonly produced from engine, machine, and vehicle maintenance. Used oils are typically recycled -- usually as fuel, either on-site or after sale to used oil collectors. In the past, generators were paid as much as forty cents per gallon for used oil (in mid-1985, twenty cents per gallon was most typical). The price paid to generators was high because virgin fuel prices were high. The recent fall in virgin fuel prices has depressed used oil prices. Because of this, some generators are now paying for used oil pickups.

The only Federal rule that currently applies to used oil generators is the prohibition on mixing hazardous wastes, such as spent solvents, with used oil. The resulting mixture (regardless of halogen concentrations) is regulated as a hazardous waste, and the facility has to comply with hazardous waste generator regulations. Used oil itself is not currently listed as a Federal hazardous waste. There are no other used oil rules that apply to used oil generators.

Used Oil Collectors, Processors, and Marketers

Used oil businesses have greater responsibilities under EPA's regulatory framework. When these facilities sell (or use) as fuel used oil that contains toxic metals, they are responsible for sending it to the proper type of burner. These "off-specification" used oils may be sold only to industrial burners. Used oil may be off-specification because of arsenic, cadmium, chromium, lead, inorganic halogens, or flashpoint. Facilities selling off-spec used oils must notify EPA.

Used oil fuels that are on-specification are essentially equivalent to virgin fuels. Under the used oil rules, on-spec oil is totally exempt from regulation. Facilities that are the first to claim that used oil fuels meet the specification must also notify the Agency.

Because these used oil businesses control the quality and destinations of recycled used oils, EPA's upcoming regulatory strategy focuses on these facilities. We have proposed specific requirements for these facilities. The Agency is evaluating the comments received on the proposal.

Used Oil Burners

The final rule of November 29 required industrial facilities that wished to burn off-specification used oil to notify the Agency. We wanted to establish some accountability and a means of tracking the sale of off-specification fuels to the proper facilities. The notification is merely a one-time requirement that serves the limited purpose of aiding in implementation of the ban on burning off-specification used oil fuels in non-industrial boilers. By notifying, burners do not indicate that they are burning hazardous waste. Nor does notification bind burners to follow any particular standards for burning or storing the used oil fuel. For our convenience, we suggested that facilities notify the Agency using a modified hazardous waste notification form (Form 8700-12). Our intent was not to suggest that off-specification used oil fuels were hazardous wastes, nor that these facilities were hazardous waste facilities. Facilities are free to notify using other means, provided that all required information is provided.

The only Federal requirements from the November 29 final rule that apply to burners who purchase or receive off-specification used oil fuel are limited "paperwork" standards, namely:

1. to notify the Agency as an off-specification used oil burner (§266.44(b))(a one-time requirement),
2. to inform used oil suppliers that the burner has notified the Agency, and will burn off-spec oil in an industrial device only (§266.44(c)), and
3. to keep invoices of shipments received (§266.44(e)).

At this time, there are no other Federal requirements that apply. Used oil is not now a Federally-listed hazardous waste. The November 29 final rule does not impose any Federal storage requirements for used oils. EPA does not require used oil facilities to obtain liability insurance for storage or burning of used oil. The November 29 final rule does not require facilities burning off-spec used oil fuel to have air pollution control devices.

Used oil fuels that meet the fuel specifications are totally exempt from regulation. Burners of on-spec oil need not notify the Agency. We judge specification used oil fuels to be essentially equivalent to virgin fuel oils. There are no plans to change this finding.

For Further Information

EPA is concerned about the current state of the used oil recycling system. We will continue to consider impacts on used oil recycling in our deliberations. If you have additional questions, please contact the RCRA/Superfund Hotline (800/424-3346 or 202/382-3000).

P 256 396 243

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	Henry Andre	
Street and No.	FIA Mining & Mat.	
P.O., State, and ZIP Code	Brooksville, FL	
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	3-13-91 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)

3. Article Addressed to: Henry E. Andre, VP FIA Mining & materials P.O. Box 6 Brooksville, FL 34605-0006	4. Article Number P 256 396 243 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
5. Signature - Addressee X Betty Sp Ellen	Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature - Agent X	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery 3-26-91	

P 617 884 170



Certified Mail Receipt
No Insurance Coverage Provided
-Do not use for International Mail
(See Reverse)

PS Form 3800, June 1990

Send to	Don Kelly
Street & No.	Fla. Mining
P.O. State & ZIP Code	Brooksville, Fl
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date	10-10-91 AC 27-186923

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- Addressee's Address
 - Restricted Delivery
- Consult postmaster for fee.

3. Article Addressed to:
Mr. Don Kelly, Plant Mgr.
Fla. Mining & Materials
P.O. Box 8
Brooksville, Fl
34605-0006

4a. Article Number
P 617 884 170

- 4b. Service Type
- | | |
|---|--|
| <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 Mailed Article |

7. Date of Delivery
10-18-91

5. Signature (Addressee)
Betty Jo Isaac

6. Signature (Agent)

8. Addressee's Address (Only if requested and fee is paid)



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)

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

P 938 762 701

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

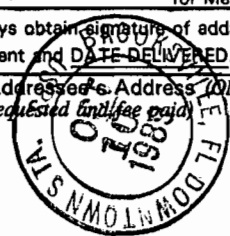
(See Reverse)

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	S
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	S
Postmark or Date Mailed: 10-4-89 Permit: A0 27-	

SENDER: Complete items 1 and 2 when additional services are desired, and complete 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent the 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)

3. Article Addressed to: Mr. Henry E. Andre, Vice Pres. Florida Mining & Materials P. O. Box 6 Brooksville, FL 34605-0006	4. Article Number P 938 762 701
	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
Always obtain signature of addressee or agent and DATE DELIVERED.	
5. Signature - Address X	8. Addressee's Address (ONLY if requested and fee paid) 
6. Signature - Agent X <i>[Signature]</i>	
7. Date of Delivery	

P 423 104 518

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

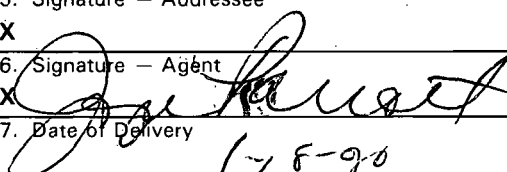
*U.S.G.P.O. 1989-234-555

 PS Form 3800, June 1985

Sent to Mr. C. M. Coleman, FMM	
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: 6-15-90 Permit: AC 27-169616	

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)

3. Article Addressed to: Mr. C. M. Coleman, Jr. Vice President and General Manager Florida Mining and Materials P. O. Box 6 Brooksville, FL 34605-0006	4. Article Number P 423 104 518 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
5. Signature - Addressee X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X 	
7. Date of Delivery 6-15-90	

P 710 058 544



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1990

Sent to D. Anetha Lue, Southdown	
Street & No. 1200 Smith Street, Ste 2400	
P.O., State & ZIP Code Houston TX 77002	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Address of Delivery	
TOTAL Postage & Fees	\$
Postmark or Date Mailed: 7-9-92 Permit: AC 27-186923	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece next to the article number.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
D. Anetha Lue, P.E.
Manager, Air Permitting
Southdown, Inc.
1200 Smith Street, Suite 2400
Houston, TX 77002

4a. Article Number
P 710 058 544

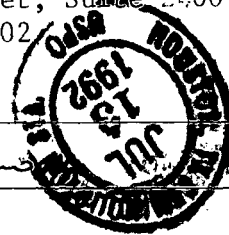
4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery
JUL 13 1992

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)



P 938 762 804

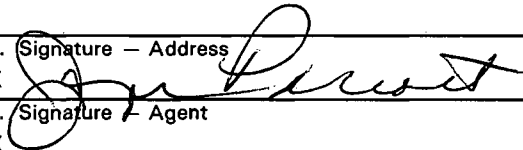
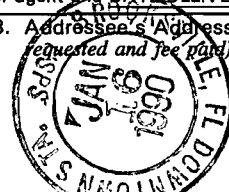
RECEIPT FOR CERTIFIED MAIL

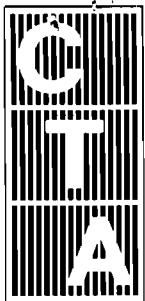
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

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: 1-10-90 Permit: AC 27-169616	

<p>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.</p> <p>1. <input type="checkbox"/> Show to whom delivered, date, and addressee's address. (Extra charge) 2. <input type="checkbox"/> Restricted Delivery (Extra charge)</p>	
<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 938 762 804</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 DATE DELIVERED.</p>
<p>5. Signature - Address X </p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p> 
<p>6. Signature - Agent X</p>	
<p>7. Date of Delivery</p>	



CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

RECEIVED
DER - MAIL ROOM

1990 SEP 25 AM 10:12

September 24, 1990

Mr. Bruce Mitchell
Florida Department of Environmental Regulation
Division of Air Resources Management
Permitting and Standards Section
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

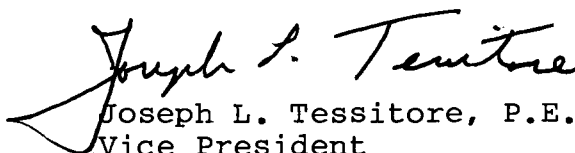
Subject: Florida Mining and Materials
Construction Permit Application to Burn Flolite in
Kiln No. 1.

Dear Bruce:

Attached is the subject application as requested in C. H. Fancy's letter of June 8, 1990. Also included is the additional processing fee as requested.

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/dlk
Enc. a/s
C3319.Doc

B. Thomas, SW Dist

RECEIVED

SEP 25 1990

DER-BAQ/VI



QUESTIONS? CALL 800-238-5355 TOLL FREE

AIRBILL
PACKAGE
TRACKING NUMBER

6828079506

53M

6828079506

RECIPIENT'S COPY

Date 9/24/90			
From (Your Name) Please Print e Tessitore		To (Recipient's Name) Please Print Mr. Bruce Mitchell	
Your Phone Number (Very Important) 407-851-1484		Recipient's Phone Number (Very Important) 904-488-	
Company ISS-TESSITORE & ASSOCIATES		Company FEDER	
Street Address 13 S CONWAY RD STE F		Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 2600 Blair Stone Road	
City State ZIP Required TANDU FL 32811		City State ZIP Required Tallahassee FL 32399-24	

YOUR INTERNAL BILLING REFERENCE INFORMATION (First 24 characters will appear on invoice.)

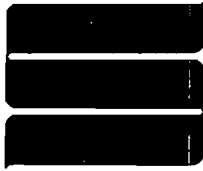
.182

IF HOLD FOR PICK-UP, Print FEDEX Address Here.

Street Address		
City	State	ZIP Required

PAYMENT 1 <input checked="" type="checkbox"/> Bill Sender	2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No.	3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No.	4 <input type="checkbox"/> Bill Credit Card
5 <input type="checkbox"/> Cash			

SERVICES (Check only one box)		DELIVERY AND SPECIAL HANDLING		PACKAGES	WEIGHT in Pounds Only	YOUR DECLARED VALUE	OVER SIZE	Emp. No.	Date	Federal Express Use	
Priority Overnight Service (Delivery by next business morning) <input checked="" type="checkbox"/> YOUR PACKAGING 51 <input type="checkbox"/> FEDEX LETTER 56 <input type="checkbox"/> FEDEX PAK 52 <input type="checkbox"/> FEDEX BOX 53 <input type="checkbox"/> FEDEX TUBE 54 Economy Service (formerly Standard Air) (Delivery by second business day) <input type="checkbox"/> ECONOMY SERVICE 70 Heavyweight Service (for Extra Large or any package over 150 lbs.) <input type="checkbox"/> HEAVYWEIGHT 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT	Standard Overnight Service (Delivery by next business afternoon) <input type="checkbox"/> FEDEX LETTER 56 <input type="checkbox"/> FEDEX PAK 52 <input type="checkbox"/> FEDEX BOX 53 <input type="checkbox"/> FEDEX TUBE 54 <input type="checkbox"/> HEAVYWEIGHT 80 <input type="checkbox"/> DEFERRED HEAVYWEIGHT	1 <input type="checkbox"/> HOLD FOR PICK-UP (Fall in Box H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 5 <input type="checkbox"/> CONSTANT SURVEILLANCE SVC. (CSS) 6 <input type="checkbox"/> DRY ICE 7 <input type="checkbox"/> OTHER SPECIAL SERVICE 8 <input type="checkbox"/> 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) 10 <input type="checkbox"/> 11 <input type="checkbox"/> DESCRIPTION 12 <input type="checkbox"/> HOLIDAY DELIVERY (if allowed) (Extra charge)		12						<input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del <input type="checkbox"/> Chg. To Hold Street Address City State Zip Received By Date/Time Received FedEx Employee Number Release Signature Date/Time	Base Charges Declared Value Charge Other 1 Other 2 Total Charges REVISION DATE 11/89 PART #119501 FXEM 2/90 FORMAT #014 © 1989 F.E.C. PRINTED IN U.S.A.
DIM SHIPMENT (Heavyweight Services Only)											
Received At:											
<input type="checkbox"/> Regular Stop <input type="checkbox"/> Drop Box <input type="checkbox"/> On-Call Stop <input type="checkbox"/> B.S.C. <input type="checkbox"/> Station											



RECEIVED
DER - MAIL ROOM
1992 MAR 31 AM 11:03

March 30, 1992

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, Florida 32399-2400

Subject: Florida Mining and Materials
Brooksville Cement Plant
Cement Kiln #1: Permit No. AC27-186923
Request For An Extension In Expiration Date

Dear Mr. Fancy:

In response to Mr. Peter Cunningham's letter dated September 26, 1991, the Florida Department of Environmental Regulation approved an extension in the expiration date, by letter dated October 8, 1991, from December 31, 1991 to March 31, 1992, for Florida Mining & Materials' construction permit AC27-186923 for Kiln No. 1.

Emission testing, required by Specific Condition 12 was completed on February 28, 1992. In accordance with Specific Condition No. 10, Southdown will be submitting the test report by April 13, 1992. At that time an application for a permit-to-operate will also be submitted in accordance with Specific Condition 15.

Therefore, it is requested that the expiration date for construction permit AC27-186923 for Kiln No. 1, be extended by six months, from March 31, 1992 to September 30, 1992. A check for \$50.00 is enclosed as the processing fee for this minor modification. If you need additional information please call me at (713) 653-8098.

Sincerely,

Amarjit S. Gill, P.E.
Senior Air Permitting Engineer

c: Mr. Steve Smallwood, P.E., Director
Div. of Air Resources Management, FDER

001031

0079 4532 720 TRACKING NO.	REFERENCE NUMBER	<i>(Copy Carrier)</i>	
	NAME	<i>Scott Gidd</i>	TELEPHONE
	COMPANY	<i>SOUTHMAN INC</i>	
	STREET ADDRESS	<i>1200 Smith</i>	
	CITY	STATE	ZIP CODE
	<i>HOUSTON</i>	<i>TX</i>	<i>77002</i>
	NAME	<i>C. H. Jancovics</i>	
	COMPANY	<i>Florida Dept of Civil Regulation</i>	
	STREET ADDRESS	DEPT./FLOOR	
	<i>4000 Blair Stone Road</i>		
CITY	STATE	ZIP CODE	
<i>Tallahassee, FL</i>	<i>32309</i>	<i>32309</i>	

L	UPS SHIPPER NUMBER
	N770--876
TRACKING NO.	0079 4532 720



Board of County Commissioners

Hernando County



20 North Main Street, Room 460
Brooksville, FL 34601

November 1, 1990

RECEIVED
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

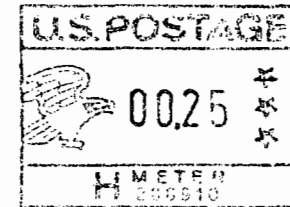
KPL/mre

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

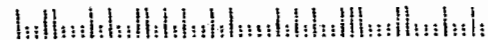
B. Mitchell
J. Reynolds
CHF/139

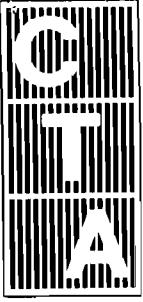
Board of County Commissioners
Hernando County

20 North Main Street, Room 460
Brooksville, Florida 34601



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





CROSS/TESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

RECEIVED

NOV 26 1990

DER-BAQM

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



CROSS/TESSITORE & ASSOCIATES, P.A.
4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812



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



P 832 538 942



Certified Mail Receipt

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

PS Form 3800, June 1990

Sent to	Don Kelly	
Street & No.	Gla. Mining & Mat.	
P.O., State & ZIP Code	Brooksville, FL	
Postage		\$
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Address of Delivery		
TOTAL Postage & Fees		\$
Postmark or Date	4-14-92 AC 27-186923	

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to
 Mr. Don Kelly
 Plant Manager
 Gla. Mining & Materials
 P.O. Box 6
 Brooksville, FL 34605-0006

4a. Article Number
P 832 538 942

4b. Service Type

<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

7. Date of Delivery
4-20-92

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)



RECEIVED

JUN 29 1992

Division of Air
Resources Management

RECEIVED

JUN 26 1992
June 26, 1992
Division of Air
Resources Management

Mr. C. H. Fancy
Bureau of Air Regulation
Florida Department of Environmental Regulation
Twin Towers Office Bldg.
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Re: Florida Mining & Materials Brooksville Cement Kiln #1 -
Request for Permit Amendment, Permit No. A027-213207

Dear Mr. Fancy:

The operating permit for Florida Mining & Materials Kiln #1 was issued by Florida Department of Environmental Regulation on June 16, 1992. Southdown Inc. dba Florida Mining & Materials requests an amendment of Specific Condition No. 4 of this permit.

Specific Condition No. 4 presently states that the operation of the kiln shall be limited in the following manner-

"The Kiln No. 1 process feed rate shall not exceed 130 tons per hour, yielding a maximum clinker production rate of 79.6 tons per hour, averaged on a rolling 30-day production period. [Construction Permit No. AC27-186923]." (*emphasis added*)

Southdown is requesting that the production rate be limited by the process feed rate to the kiln only, and that the additional requirement to limit production based on clinker production rate be deleted from the permit. Thus the amended permit would state that-

"The Kiln No. 1 process feed rate shall not exceed 130 tons per hour averaged on a rolling 30-day production period. [Construction Permit No. AC27-186923]."

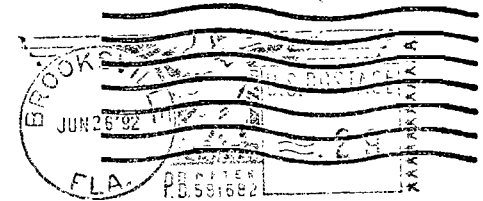
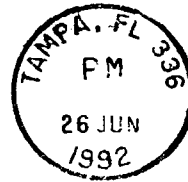
This request is based on the fact that the production rate is limited by only one of these interdependent variables, and the fact that direct measurement of the process feed rate only is available.



Brooksville Cement


A Southdown Company

P.O. Box 6 • Brooksville, Florida 34605-0006



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



Recycled paper 

P 062 921 894



Receipt for Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to <i>Ornelha Lee, PE</i>	
Street and No. <i>Southdown, Inc</i>	
City, State and ZIP Code <i>Houston, TX</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>10-6-92</i> <i>AC 27-186923</i>	

PS Form 3800, June 1991

Department of Environmental Regulation

Daily Cash Listing # 0102

Date Received 06-28-91

DEP# 0586

Bureau of Accounting & Budgeting (Revenue Section)

Date Bureau of Air Regulation Received _____

Listor's Signature Lil Sweeney

Signature of Receiver _____

REMITTED BY	CHECK NUMBER	AMOUNT	RECEIPT NUMBER	REVENUE CODE	FILE NUMBER
Cross/Tessitore & Associates P.A.	# 5504	\$ 250.00	✓ # 151288	001031	AC 27-199175

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

No. 151288

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from Cross/Tessitore & Assoc / FL Mining + Materials Date 07-08-91
 Address 4763 Conway Road, Suite F Orlando, FL 32812 P.O. Box 6 Brooksville, FL 34605-0006 Dollars \$ 250.00

Applicant Name & Address Mr. Don Kelly (FMA-1A)

Source of Revenue ✓ # 5504

Revenue Code 001031 Application Number AC 27-186923 amendment
AC 27-199175 - (subcode M-1)

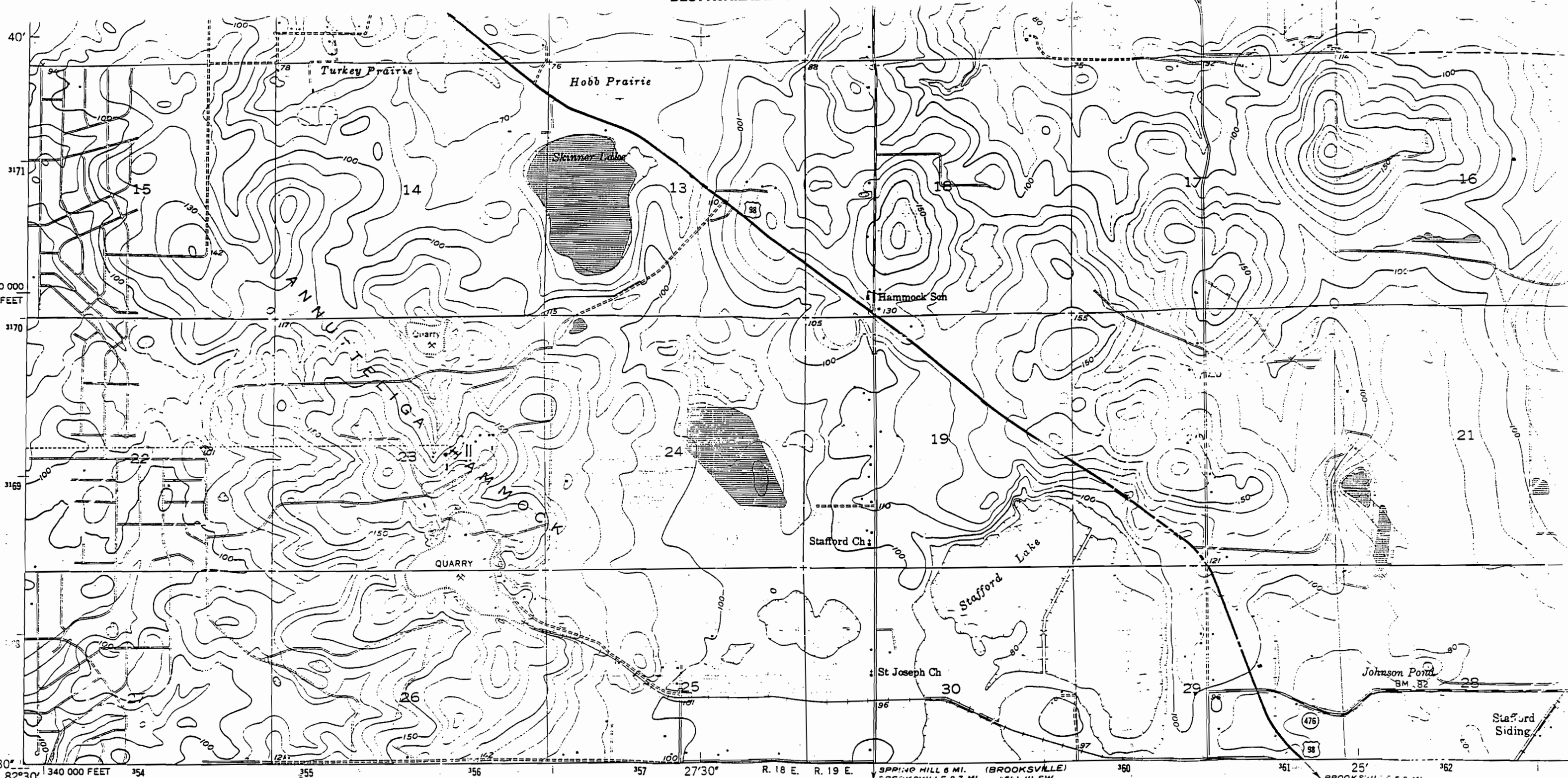
By R Bruce Mitchell

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USGS TOPOGRAPHICAL MAP



WEE WACHEE SPRING 441 11 SE

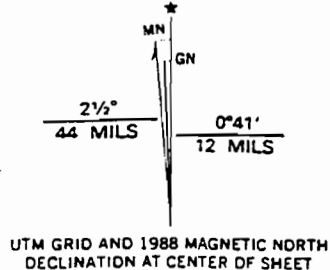
Mapped, edited, and published by the Geological Survey

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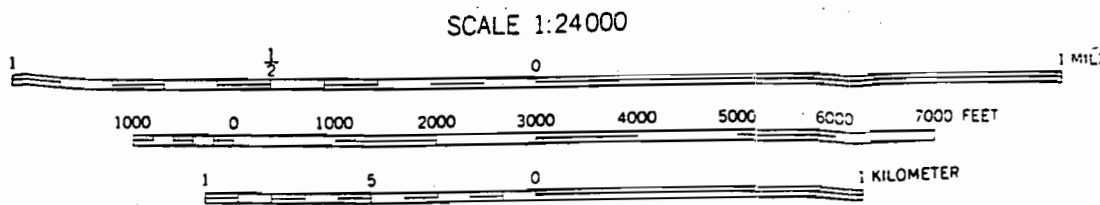
Topography from aerial photographs by Kesh plotter
Aerial photographs taken 1951. Field check 1954

Polyconic projection. 1927 North American datum
10,000-foot grid based on Florida coordinate system,
west zone
1000-meter Universal Transverse Mercator grid ticks,
zone 17, shown in blue

To place on the predicted North American Datum 1983,
move the projection lines 27 meters south and
16 meters west as shown by dashed corner ticks
There may be private inholdings within the boundaries of
the National or State reservations shown on this map



UTM GRID AND 1988 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET



SCALE 1:24000
CONTOUR INTERVAL 10 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929



QUADRANGLE LOCATION

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY
DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

Revisions shown in purple compiled from aerial photographs
other sources. This information not field checked.