



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

# DRAFT

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

December 16, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Mountain  
Environmental Manager  
Florida Crushed Stone Company  
Post Office Box 1508  
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

Re: Amendment to the Construction Permit, No. AC 27-222095 (PSD-FL-091D), to Allow the Firing of a Storage Tank Blend of On-Site Generated On-Specification Used Oil with Purchased Fuel Oil as a Start-up Fuel Only in the Facility's Cement Kiln

The Department has reviewed the request for a construction permit amendment that you provided in a letter received on March 23, 1993. The request was for Florida Crushed Stone Company's (FCSC) cement kiln to be permitted to fire a storage tank blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only; and, the maximum on-specification used oil in the final storage tank blend of on-specification used oil and purchased fuel oil shall not exceed 15%, by volume. Based on a review of the request and discussions with the Department's Southwest District and the Hernando County Planning Department representatives, the request is deemed acceptable. Therefore, the following Specific Conditions and Attachments will be added:

SPECIFIC CONDITION:

No. 19. (new)

The following conditions apply to the firing of a blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only by FCSC's cement kiln:

- o Mr. Tom Mountain's letter with enclosures dated March 18, 1993, and received by the Department on March 23, 1993, is incorporated by reference.
- o The on-specification used oil that will be blended with the purchased fuel oil in the cement kiln's storage tank shall be only from the used oil storage tanks located at the FCSC's Greg Mine and CPL Plant.
- o The maximum on-specification used oil in the final storage tank blend of on-specification used oil and purchased fuel oil shall not exceed 15%, by volume.

Mr. Tom Mountain  
Amendment to AC 27-222095 (PSD-FL-091D)  
December 16, 1993  
Page 2

- o The cement kiln shall be preheated using virgin fuel oil and/or a blend of on-specification used oil and purchased fuel oil with a total sulfur content not to exceed 1.5%, by weight. The constituents/property of the on-specification used oil shall not exceed the following associated allowable levels, as stipulated and defined in 40 CFR 266.40 (July 1, 1992 version), which is adopted by reference in Rule 17-730.181, Florida Administrative Code (F.A.C.):

Constituent/Property      Allowable Concentration

Cadmium	2 ppm maximum
Arsenic	5 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	140 °F minimum

- o Analysis and recordkeeping shall be in accordance with 40 CFR 266.43(b)(1) and (6) (July 1, 1992 version).
- o A sample shall be taken from the outlet of the blend tank on the first working day (i.e., Monday-Friday; exceptions: holidays) of each month if any used oil was placed in the tank the previous month; or, the sample can be taken directly from the used oil delivery-container at the time of delivery/transfer. However, the sampling methodology shall have been established with the Department and Hernando County prior to sampling. Upon taking a sample, the sample shall be analyzed for the following parameters and units and using the following test methods:

<u>Parameter</u>	<u>Unit</u>	<u>Test Method</u>
Cadmium	ppm	EPA SW-846(3040-7130)
Arsenic	ppm	EPA SW-846(3050-7061)
Chromium	ppm	EPA SW-846(3040-7190)
Lead	ppm	EPA SW-846(3040-7420)
Total Halogens	ppm	ASTM E442
Sulfur	%	ASTM D129
Flash Point	°F	ASTM D93
Heat of Combustion	Btu/gal	D287
Density	lbs/gal	

Note: Other test methods may be used only after receiving written approval from the Department.

- o The results of each sample analysis shall be submitted to the Department's Southwest District and the Hernando County Planning offices within 30-days after a sample is taken.

*mobile tank  
after each collection  
to the driver  
of transfer;  
but, no less than  
quantity.*

# DRAFT

Mr. Tom Mountain  
Amendment to AC 27-222095 (PSD-FL-091D)  
December 16, 1993  
Page 3

- o The dates and quantities of both on-specification and purchased fuel oil delivered/transferred to the cement kiln's storage tank shall be reported quarterly (i.e., Jan.-Mar., April-June, July-Sept., and Oct.-Dec.) to the Department's Southwest District and the Hernando County Planning offices and due during the month following the ending quarter.
- o Permittee agrees that the used oil to be blended and burned at this facility shall not be a hazardous waste as defined by Rule 17-730.030, F.A.C., or 40 CFR Part 261 (July 1, 1992 version) and will not include fuels or blended fuels consisting in whole or in part of hazardous waste or which include mixtures of any solid waste generated from the treatment, storage, or disposal of hazardous waste, and such burning shall be in compliance with Section 403.769(3), Florida Statutes.

Attachments to be Incorporated:

- o Mr. C. H. Fancy's letter dated 1/26/93.
- o Mr. Tom Mountain's letter with enclosure received 3/23/93.
- o Mr. C. H. Fancy's letter dated 4/1/93.
- o Mr. Tom Mountain's letter and processing fee received 4/14/93.
- o Mrs. Katherine P. Liles's letter received 5/27/93.
- o Mr. C. H. Fancy's letter dated 6/8/93.
- o Mrs. Katherine P. Liles's Memorandum received 11/19/93, via FAX.
- o Mr. Tom Mountain's letter received 11/29/93.
- o Mr. C. Anthony Cleveland's letter received 12/8/93, via FAX.
- o 40 CFR (July 1, 1992 version).

This letter must be attached to the construction permit, No. AC 27-222095, and federal permit PSD-FL-091 (PSD-FL-091D), and shall become a part of the permits.

Sincerely,

---

Howard L. Rhodes  
Director  
Division of Air Resources Management

HLR/rbm

Attachments

cc: B. Thomas, SW District  
J. Bunyak, NPS  
C. Hetrick, HCBCC  
T. Mountain, FCSC  
D. Beason, Esq., DEP  
J. Harper, EPA  
A. Cleveland, Esq., OHF&C



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Dec. 12, 1993

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RECEIVED

DEC 16 1993  
Division of Air Resources Management  
Virginia B. Wetherell  
Secretary

WAIVER OF 90 DAY TIME LIMIT  
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No.: AC27-222095 (PSD-FLO91D)

Applicant's Name: FLORIDA CRUSHED STONE CO.

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 15th day of December 1993.

The undersigned is authorized to make this waiver on behalf of the applicant.

Tom Mountain  
SIGNATURE

Tom Mountain  
NAME (PLEASE TYPE OR PRINT)

Environmental Manager

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 3

To <i>Tony Cleveland</i>	From <i>Bruce Mitchell</i>
Co. <i>Oertel Hoffman et al</i>	Co. <i>FDEP/DABM/BAR</i>
Dept.	Phone # <i>904-921-9506</i>
Fax # <i>877-0981</i>	Fax # <i>904-922-6979</i>

DEC-09-'93 THU 10:36

TERM ID:

P-9999

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
231	12-09	10:34	00°02'11	9048770981		03	00

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 3

To <i>Tom Mountain</i>	From <i>Bruce Mitchell</i>
Co. <i>FL Crushed Stone Co</i>	Co. <i>FDEP/DABM/BAR</i>
Dept. <i>Environmental</i>	Phone # <i>904-921-9506</i>
Fax # <i>904-796-6281</i>	Fax # <i>904-922-6979</i>

DEC-09-'93 THU 10:41

TERM ID:

P-9999

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
232	12-09	10:38	00°02'28	904 796 6281		03	00

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 3

To <i>Ruthy Hiles</i>	From <i>Bruce Mitchell</i>
Co. <i>Hernando County</i>	Co. <i>FDEP/DABM/BAR</i>
Dept. <i>Planning</i>	Phone # <i>904-921-9506</i>
Fax # <i>904-754-4420</i>	Fax # <i>904-922-6979</i>

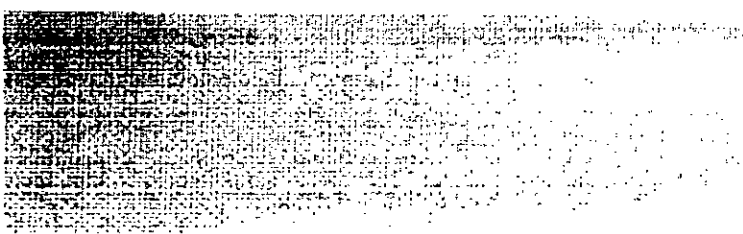
DEC-09-'93 THU 10:45

TERM ID:

P-9999

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
233	12-09	10:42	00°02'16	1 904 754 4420		03	00





# Florida Department of Environmental Protection

# DRAFT

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

December 16, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Mountain  
Environmental Manager  
Florida Crushed Stone Company  
Post Office Box 1508  
Brooksville, Florida 34605-1508

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- o The on-specification used oil that will be blended with the purchased fuel oil in the cement kiln's storage tank shall be only from the used oil storage tanks located at the FCSC's Greg Mine and CPL Plant.
- o The maximum on-specification used oil in the final storage tank blend of on-specification used oil and purchased fuel oil shall not exceed 15%, by volume.

Mr. Tom Mountain  
Amendment to AC 27-222095 (PSD-FL-091D)  
December 16, 1993  
Page 2

- o The cement kiln shall be preheated using virgin fuel oil and/or a blend of on-specification used oil and purchased fuel oil with a total sulfur content not to exceed 1.5%, by weight. The constituents/property of the on-specification used oil shall not exceed the following associated allowable levels, as stipulated and defined in 40 CFR 266.40 (July 1, 1992 version), which is adopted by reference in Rule 17-730.181, Florida Administrative Code (F.A.C.):

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Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	140 °F minimum

- o Analysis and recordkeeping shall be in accordance with 40 CFR 266.43(b)(1) and (6) (July 1, 1992 version).
- o A sample shall be taken from the outlet of the blend tank on the first working day (i.e., Monday-Friday; exceptions: holidays) of each month if any used oil was placed in the tank the previous month; or, the sample can be taken directly from the used oil mobile collection tank after final collection and prior to the time of the initial transfer; but, the sampling frequency shall be no less than quarterly. ~~However,~~ <sup>and</sup> the sampling methodology shall have been established with the Department and Hernando County prior to sampling. Upon taking a sample, the sample shall be analyzed for the following parameters and units and using the following test methods:

<u>Parameter</u>	<u>Unit</u>	<u>Test Method</u>
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Density	lbs/gal	

Note: Other test methods may be used only after receiving written approval from the Department.

- o The results of each sample analysis shall be submitted to the

# DRAFT

Mr. Tom Mountain  
Amendment to AC 27-222095 (PSD-FL-091D)  
December 16, 1993  
Page 3

- Department's Southwest District and the Hernando County Planning offices within 30-days after a sample is taken.
- o The dates and quantities of both on-specification and purchased fuel oil transferred to the cement kiln's storage tank shall be reported quarterly (i.e., Jan.-Mar., April-June, July- Sept., and Oct.-Dec.) to the Department's Southwest District and the Hernando County Planning offices and due during the month following the ending quarter.
  - o Permittee agrees that the used oil to be blended and burned at this facility shall not be a hazardous waste as defined by Rule 17-730.030, F.A.C., or 40 CFR Part 261 (July 1, 1992 version) and will not include fuels or blended fuels consisting in whole or in part of hazardous waste or which include mixtures of any solid waste generated from the treatment, storage, or disposal of hazardous waste, and such burning shall be in compliance with Section 403.769(3), Florida Statutes.

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Howard L. Rhodes  
Director  
Division of Air Resources Management

HLR/rbm

Attachments

cc: B. Thomas, SWD  
C. Hetrick, HCBCC  
J. Harper, EPA  
D. Beason, Esq., DEP  
A. Cleveland, Esq., OHF&C  
J. Bunyak, NPS



Post-It™ brand fax transmittal memo 7671 # of pages ▶ 3

To	Tony Cleveland	From	Bruce Mitchell
Co.	Dentel/Hottelmen et al	Co.	FDEP/DARM/BAR
Dept.		Phone #	904-921-9506
Fax #	877-0981	Fax #	922-6979

DEC-08-'93 WED 08:14  
P-9999

TERM ID:  
TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
209	12-08	08:12	00° 02' 06	9048770981		03	00

12-8-93  
@ 9:40  
30 min I Tony checked -  
his language is being evaluated  
by Kathy and is to respond  
to him today. He will then  
bring me the language to  
be included in the  
amendment.  
Bm

~~Checked 796628~~

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 3

To	Tom Mountain	From	Bruce Mitchell
Co.	FL Cucked Stants	Co.	FDEP/DARM/BAR
Dept.		Phone #	904-921-9506
Fax #	904-754-9836	Fax #	904-922-6979

DEC-08-'93 WED 08:23  
P-9999

TERM ID:  
TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
210	12-08	08:21	00° 02' 20	9047549836		03	00

12-8-93  
@ 10:05  
sent to Brooksville Court - @ a different location than  
FSC. Asked her to throw the document away - to send  
another FAX. Bm

Post-It™ brand fax transmittal memo 7671 # of pages ▶ 3

To	Kathy Hiles	From	Bruce Mitchell
Co.	Herando Co Planning	Co.	FDEP/DARM/BAR
Dept.		Phone #	904-921-9506
Fax #	904-754-4420	Fax #	904-922-6979

DEC-08-'93 WED 09:22  
P-9999

TERM ID:  
TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
212	12-08	09:19	00° 02' 14	1 904 754 4420		03	00



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

# DRAFT

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

December 16, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Randy Thompson  
Environmental Department  
Florida Crushed Stone Company  
Post Office Box 490300  
Leesburg, Florida 34749-0300

Dear Mr. Thompson:

Re: Amendment to the Construction Permit, No. AC 27-222095 (PSD-FL-091D), to Allow the Firing of a Storage Tank Blend of On-Site Generated On-Specification Used Oil with Purchased Fuel Oil as a Start-up Fuel Only in the Facility's Cement Kiln

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No. 19. (new)

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# DRAFT

Mr. Randy Thompson  
Amendment to AC 27-222095 (PSD-FL-091D)  
December 16, 1993  
Page 2

- o The maximum on-specification used oil shall not exceed 15%, by volume, of the final storage tank blend of on-specification used oil and purchased fuel oil.
- o The cement kiln shall be preheated using virgin fuel oil and/or on-specification used oil with a total sulfur content not to exceed 1.5%, by weight. The constituents/property of the on-specification used oil shall not exceed the following associated allowable levels, as stipulated and defined in 40 CFR 266.40 (July 1, 1992 version), which is adopted by reference in Rule 17-730.181, F.A.C.:

Constituent/Property Allowable Concentration

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Flash Point	140 °F minimum

- o Analysis and recordkeeping shall be in accordance with 40 CFR 266.43(b)(1) and (6).
- o A sample shall be taken from the outlet of the blend tank on the first working day (i.e., Monday-Friday; exceptions: holidays) of each month if any used oil was placed in the tank the previous month; or, the sample can be taken directly from the used oil delivery container <sup>at the time of delivery</sup> ~~at the time of delivery~~/transfer. However, the sampling methodology shall have been established with the Department and Hernando County prior to sampling. Upon taking a sample, the sample shall be analyzed for the following parameters and units and using the following test methods:

*blend tank*

<u>Parameter</u>	<u>Unit</u>	<u>Test Method</u>
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Arsenic	ppm	EPA SW-846(3050-7061)
Chromium	ppm	EPA SW-846(3040-7190)
Lead	ppm	EPA SW-846(3040-7420)
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DRAFT

Mr. Randy Thompson  
Amendment to AC 27-222095 (PSD-FL-091D)  
December 16, 1993  
Page 3

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Attachments to be Incorporated:

- o Mr. C. H. Fancy's letter dated January 26, 1993.
- o Mr. Tom Mountain's letter with enclosure received March 23, 1993.
- o Mr. C. H. Fancy's letter dated April 1, 1993.
- o Mr. Tom Mountain's letter and processing fee received April 14, 1993.
- o 40 CFR (July, 1992 version).

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Sincerely,

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Howard L. Rhodes  
Director  
Division of Air Resources Management

HLR/rbm

Attachments

cc: B. Thomas, SW District  
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J. Bunyak, NPS  
J. Harper, EPA  
C. Hetrick, HCBCC  
A. Cleveland, Esq., OHF&C  
T. Mountain, FCSC

OERTEL, HOFFMAN, FERNANDEZ & COLE, P. A.

ATTORNEYS AT LAW

TIMOTHY P. ATKINSON  
M. CHRISTOPHER BRYANT  
R. L. CALEEN, JR.  
C. ANTHONY CLEVELAND  
TERRY COLE  
ROBERT C. DOWNIE, II  
SEGUNDO J. FERNANDEZ  
KENNETH F. HOFFMAN  
KENNETH G. OERTEL  
PATRICIA A. RENOVITCH  
SCOTT SHIRLEY  
THOMAS G. TOMASELLO  
W. DAVID WATKINS

SUITE C  
2700 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301

MAILING ADDRESS:  
POST OFFICE BOX 6507  
TALLAHASSEE, FLORIDA 32314-6507

TELEPHONE (904) 877-0099  
FACSIMILE (904) 877-0981

NORMAN H. HORTON, JR.  
OF COUNSEL

JOHN H. MILLICAN  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BAR)

J. P. SUBRAMANI, PH. D., P. E.  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BAR)

RECEIVED

DEC 10 1993

December 8, 1993

Division of Air  
Resources Management

Mr. Bruce Mitchell  
Bureau of Air Regulation  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: FCSC Permit Amendment

Dear Bruce:

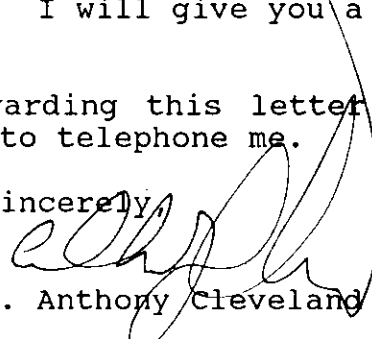
The amendment language which Florida Crushed Stone Company and Hernando County have been able to agree upon is as follows. Under new Specific Condition No. 19, the second bullet will end with the phrase CPL Plant. The phrase "mobile shops" will be dropped. The first sentence of the fourth bullet will be amended to provide as follows, "The cement kiln shall be preheated using virgin fuel oil and/or a blend of on-specification used oil and purchased fuel oil with a total sulfur content not to exceed 1.5%, by weight." A ninth bullet will be added to the amendment which will provide as follows:

- o Permittee agrees that the used oil to be blended and burned at this facility shall not be a hazardous waste as defined by 17-730.030 or 40 CFR Part 261 and will not include fuels or blended fuels consisting in whole or in part of hazardous waste or which include mixtures of any solid waste generated from the treatment, storage, or disposal of hazardous waste, and such burning shall be in compliance with Section 403.769(3), F.S.

The County still has a question regarding the sixth bullet which governs the sampling schedule. I will give you a telephone call regarding this this afternoon.

If you have any questions regarding this letter before I contact you, please do not hesitate to telephone me.

Sincerely,

  
C. Anthony Cleveland

CAC/dg/1579  
C:\Work1\Mitch3Lt.CAC



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

RECEIVED

DEC - 7 1993

Division of Air  
Resources Management  
Virginia B. Wetherill  
Secretary

WAIVER OF 90 DAY TIME LIMIT  
UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No.: AC27-222095 (PSD-FLO91D)

Applicant's Name: FLORIDA CRUSHED STONE Co.

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 10th day of December 1993.

The undersigned is authorized to make this waiver on behalf of the applicant.

Tom Mountain  
SIGNATURE

Tom Mountain  
NAME (PLEASE TYPE OR PRINT)

Environmental Manager

# OERTEL, HOFFMAN, FERNANDEZ & COLE, P. A.

ATTORNEYS AT LAW

TIMOTHY P. ATKINSON  
M. CHRISTOPHER BRYANT  
R. L. CALEEN, JR.  
C. ANTHONY CLEVELAND  
TERRY COLE  
ROBERT C. DOWNIE, II  
SEGUNDO J. FERNANDEZ  
KENNETH F. HOFFMAN  
KENNETH G. OERTEL  
PATRICIA A. RENOVITCH  
SCOTT SHIRLEY  
THOMAS G. TOMASELLO  
W. DAVID WATKINS

SUITE C  
2700 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301

MAILING ADDRESS:  
POST OFFICE BOX 8507  
TALLAHASSEE, FLORIDA 32314-8507

TELEPHONE (904) 877-0099  
FACSIMILE (904) 877-0981

NORMAN H. HORTON, JR.  
OF COUNSEL

JOHN H. MILLICAN  
ENVIRONMENTAL CONSULTANT  
NOT A MEMBER OF THE FLORIDA BAR

J. P. SUBRAMANI, PH. D., P. E.  
ENVIRONMENTAL CONSULTANT  
NOT A MEMBER OF THE FLORIDA BAR

December 8, 1993

Mr. Bruce Mitchell  
Bureau of Air Regulation  
Florida Department of  
Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: FCSC Permit Amendment

Dear Bruce:

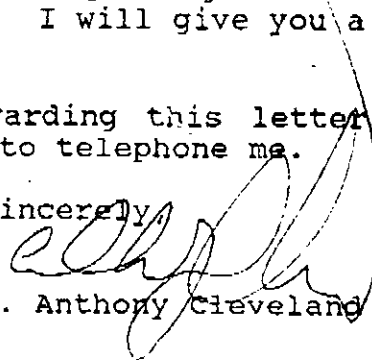
The amendment language which Florida Crushed Stone Company and Hernando County have been able to agree upon is as follows. Under new Specific Condition No. 19, the second bullet will end with the phrase CPL Plant. The phrase "mobile shops" will be dropped. The first sentence of the fourth bullet will be amended to provide as follows, "The cement kiln shall be preheated using virgin fuel oil and/or a blend of on-specification used oil and purchased fuel oil with a total sulfur content not to exceed 1.5%, by weight." A ninth bullet will be added to the amendment which will provide as follows:

- o Permittee agrees that the used oil to be blended and burned at this facility shall not be a hazardous waste as defined by 17-730.030 or 40 CFR Part 261 and will not include fuels or blended fuels consisting in whole or in part of hazardous waste or which include mixtures of any solid waste generated from the treatment, storage, or disposal of hazardous waste, and such burning shall be in compliance with Section 403.769(3), F.S.

The County still has a question regarding the sixth bullet which governs the sampling schedule. I will give you a telephone call regarding this this afternoon.

If you have any questions regarding this letter before I contact you, please do not hesitate to telephone me.

Sincerely,

  
C. Anthony Cleveland

CAC/dg/1579  
C:\Work1\Mitch3Lt.CAC

I N T E R O F F I C E   M E M O R A N D U M

**Date:** 07-Dec-1993 01:39pm EST  
**From:** John Taylor TPA  
TAYLOR\_J@A1@TPA1  
**Dept:** Southwest District Offi  
**Tel No:** 813/744-6100  
**SUNCOM:**

**TO:** Bruce Mitchell TAL

( MITCHELL\_B @ A1 @ DER )

**Subject:** FCSC: amendment-oil usage-AC27-222095

Bruce

I have a copy of the amendment to allow the kiln to fire used oil. You sent a copy to George Richardson, SWD on November 15, and George sent you some comments. If you have revised the amendment, I would like a copy so I can finalize the Air Operation Permit I am working on.

If you have the amendment in All-In-One, I could access your Drawer and get a copy. I am for what ever works, and is easiest for you to do.

Thanks,

John J. Taylor  
SC 542-6100 x 408

813-744-6100

fax 813-744-6083





**FLORIDA CRUSHED STONE COMPANY**

CEMENT / POWER / LIME PLANT

November 17, 1993

**RECEIVED**

NOV 29 1993

Division of Air  
Resources Management

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

RE: Used Oil Amendment: AC27-222095 (PSD - FL 091D)

Dear Bruce:

I have received the draft language for the above referenced amendment provided by your office. Florida Crushed Stone agrees to the language given that the following changes are made:

1. The amendment is to be addressed to:  
Mr. Tom Mountain  
Environmental Manager  
Florida Crushed Stone Company  
P.O. Box 1508  
Brooksville, Florida 34605
2. The last part of Specific Condition 19 at the top of page 3. "and the Hernando County Planning Office" is to be changed to read "and made available to the Hernando County Planning Department upon request."

These changes have been discussed with and accepted by Ms. Kathy Liles of the Hernando County Planning Office.

Sincerely,

A handwritten signature in cursive script that reads "Tom Mountain".

Tom Mountain  
Environmental Manager

TM:sf

cc: K. Liles, Hernando County Planning Department  
A. Cleveland: Ortel, Hoffman, Fernandez & Cole



RECEIVED

NOV 19 1993

Division of Air Resources Management

FLORIDA CRUSHED STONE COMPANY  
CEMENT / POWER / LIME PLANT

November 17, 1993

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

RE: Used Oil Amendment: AC27-222095 (PSD - FL 091D)

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Environmental Manager  
Florida Crushed Stone Company  
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Brooksville, Florida 34605
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These changes have been discussed with and accepted by Ms. Kathy Liles of the Hernando County Planning Office.

Sincerely,

Tom Mountain  
Environmental Manager

TM:sf

Post-It™ brand fax transmittal memo 7671		# of pages	4
To	BRUCE MITCHELL	From	TOM MOUNTAIN
Co.	FDEP	Co.	FCS
Dept.	AIR BUREAU	Phone #	(904) 799-7881
Fax #	(904) 922-6979	Fax #	(904) 796-6281

cc: K. Liles, Hernando County Planning Department  
A. Cleveland: Ortel, Hoffman, Fernandez & Cole

# DRAFT

November 15, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

~~Mr. Randy Thompson  
Environmental Department  
Florida Crushed Stone Company  
Post Office Box 490300  
Leesburg, Florida 34749-0300~~

Mr. Tom Mountain  
Environmental Manager  
Florida Crushed Stone Company  
Post Office Box 1508  
Brooksville, Florida 34605

Dear Mr. ~~Thompson~~ Mountain:

Re: Amendment to the Construction Permit, No. AC 27-222095 (PSD-FL-091D), to Allow the Firing of a Storage Tank Blend of On-Site Generated On-Specification Used Oil with Purchased Fuel Oil as a Start-up Fuel Only in the Facility's Cement Kiln

The Department has reviewed the request for a construction permit amendment that Mr. Tom Mountain provided in a letter received on March 23, 1993. The request was for Florida Crushed Stone Company's (FCSC) cement kiln to be permitted to fire a storage tank blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only; and, the maximum on-specification used oil in the final on-specification used oil-purchased fuel oil storage tank blend shall not exceed 15%, by volume. Based on a review of the request and discussions with the Department's Southwest District and the Hernando County Planning Department representatives, the request is deemed acceptable. Therefore, the following Specific Conditions and Attachments will be added:

**SPECIFIC CONDITION:**

**No. 19. (new)**

The following conditions apply to the firing of a blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only by FCSC's cement kiln:

- o Mr. Tom Mountain's letter with enclosures dated March 18, 1993, and received by the Department on March 23, 1993, is incorporated by reference.
- o The on-specification used oil that will be blended with the purchased fuel oil in the cement kiln's storage tank shall be only from the used oil storage tanks located at the FCSC's Greg Mine and CPL Plant mobile shops.

NOV-15-'93 MON 09:54 ID:

TEL NO:

#859 P04

# DRAFT

Mr. Randy Thompson  
 Amendment to AC 27-222095 (PSD-FL-091D)  
 November 15, 1993  
 Page 3

- o The dates and quantities of both on-specification and purchased fuel oil delivered/transferred to the cement kiln's storage tank shall be reported quarterly in a report to the Department's Southwest District, ~~and the Hernando County Offices~~

*and made available to the Hernando County Planning ~~Department~~ <sup>County</sup> Department upon request.*

**Attachments to be Incorporated:**

- o Mr. C. H. Fancy's letter dated January 26, 1993.
- o Mr. Tom Mountain's letter with enclosure received March 23, 1993.
- o Mr. C. H. Fancy's letter dated April 1, 1993.
- o Mr. Tom Mountain's letter and processing fee received April 14, 1993.
- o 40 CFR (July, 1992 version).

This letter must be attached to the construction permit, No. AC 27-222095, and federal permit PSD-FL-091 (PSD-FL-091D), and shall become a part of the permits.

Sincerely,

\_\_\_\_\_  
 Howard L. Rhodes  
 Director  
 Division of Air Resources Management

HLR/rba

**Attachments**

cc: B. Thomas, SW District  
 D. Beason, Esq., DEP  
 J. Bunyak, NPS  
 J. Harper, EPA  
 C. Hetrick, HCBCC  
 A. Cleveland, Esq., OHP&C  
 T. Mountain, FCSC

*called 8:30  
will be picking up*

**HERNANDO COUNTY PLANNING DEPARTMENT**

20 N. Main Street, Room 262  
Brooksville, FL 34601  
904-754-4057

**FAX TRANSMITTAL**

DATE: 11-19-93

TRANSMITTAL TO: Bruce Mitchell

COMPANY/AGENCY: DE

FAX NUMBER: 278-6579

BRIEF SUBJECT: Florida Crushed Stone Used Oil

NUMBER OF PAGES INCLUDING TRANSMITTAL SHEET: 12

FROM: Kathy Liles

AGENCY: **HERNANDO COUNTY PLANNING DEPARTMENT**

FAX: **904-754-4420**

NOTES:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

If you do not receive the number of pages listed above, please call 904-754-4057. Thank you.

*11-22-93  
3:50  
Spoke w Tony Chouinard  
went over. It was 1-10 with  
him - he's to send me  
403.769(3) Fish  
Bm*


November 19, 1993

**MEMORANDUM**

**FD-151**

**TO:** Honorable Chairman and Members of the Board of County Commissioners

**VIA:** Charles B. Hetrick, County Administrator

**VIA:**  Lawrence Jennings, Department Director  
Planning Department

**FROM:** Katherine P. Liles, AICP, Environmental Planner  
Planning Department

**SUBJECT:** Florida Crushed Stone Used Oil

Attached for consideration by the Board of County Commissioners is a copy of the draft air construction permit amendment to allow Florida Crushed Stone to burn used oil as a start-up fuel in the facility's cement kiln. Also attached is Oertel, Hoffman, Fernandez and Cole's response and Florida Crushed Stone's response to the draft language.

Staff has evaluated all of the attached responses and proposes the following be considered for incorporation or amendment within the permit.

- 1) Staff concurs with Florida Crushed Stone's designation of Tom Mountain as the FCS representative on the permit.
- 2) Staff concurs with Oertel, Hoffman, Fernandez and Cole that language be added to the permit, consistent with that which was included in the Asphalt Pavers permit, which ensures that materials used in the kiln are not classified as a characteristic hazardous waste. In addition, staff recommends that an agreement between Hernando County and FCS be signed which states that FCS will abide by the Hazardous Waste Facility Moratorium Ordinance and not burn used oil in the cement kiln which will violate the provisions of 40CFR 261 and 40CFR 266 Part D and E.
- 3) Staff partially concurs with Florida Crushed Stone's recommendation concerning reportability. FCS wishes to make available to Hernando County the dates and quantities of oil transported to the bulk storage tank upon request versus reporting the data monthly. Staff concurs with the change making information available upon request; however, the data should be made available to "representatives of

E:\WPDATA\KATHYL\FCSOIL.MMO

**Hernando County."**

- 4) Staff concurs with the position of the DEP District Office to amend the draft language to require monthly analyses of the samples.
- 5) A potential conflict arises with the requirement of the sampling of the used oil to occur after it has been blended with virgin fuel oil. The permit solidly states that the used oil is to come from the oil storage tanks located at the facilities' mobile shops; therefore, it is not anticipated that the used oil will be contaminated with other potentially problematic materials. However, virgin oil typically has a lower flashpoint than used oil. Therefore, FCS runs the risk of analyzing a blended sample and being in violation of the County's Hazardous Waste Facility Moratorium Ordinance if that sample falls below a flashpoint of 140 degrees. Staff's position is to allow the blended sample to be used with FCS placed on notice that the blended sample could provide misleading analytical results which could place them in violation of the County's ordinance. Staff would not object to a request by FCS to store the used oil from the mobile shops in a properly conducted bulk storage tank and sample the oil before it is blended, if this change is requested.
- 6) Staff concurs with Oertel, Hoffman, Fernandez and Cole's suggestion that the provision describing the preheating process for the kiln be clarified to reflect the 15% substitution of virgin fuel oil with on-spec used oil (Bullet Number 4 of the proposed amendment). However, this clarification is not essential as page one of the draft amendment clearly states that "the maximum on-specification used oil in the final on-specification used oil/purchased oil fuel oil storage tank blend shall not exceed 15%."

Amendment to the draft proposed language to reflect items 1-6 above should ensure that the permit amendment is acceptable to Hernando County.

**STAFF RECOMMENDATION**

Staff recommends that the Board of County Commissioners concur with the amendments to the draft permit language consistent with items one through six above and that the Board direct Oertel, Hoffman, Fernandez and Cole to coordinate with DEP to finalize the permit language. Staff further recommends that Oertel, Hoffman, Fernandez and Cole be given direction to prepare an agreement for signature by the County and Florida Crushed Stone requiring FCS to meet the requirements of the County's Hazardous Waste Facility Moratorium Ordinance.

NOV 15 1993 MON 09:40 1D:

TEL NO:

4058 P01



Lawton Chiles  
Governor

# Florida Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

## FAX TRANSMITTAL SHEET

TO: Kathy Kite

DATE: 11-15-93 PHONE: 904-754-4420

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: proposal amend. for FCSC to be allowed to  
burn used-oil w/ a start-up fuel as a blend  
with purchased oil

PHONE: 904-921-9506

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.



# DRAFT

November 15, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Randy Thompson  
Environmental Department  
Florida Crushed Stone Company  
Post Office Box 490300  
Leasburg, Florida 34749-0300

Dear Mr. Thompson:

Re: Amendment to the Construction Permit, No. AC 27-222095 (PSD-FL-091D), to Allow the Firing of a Storage Tank Blend of On-Site Generated On-Specification Used Oil with Purchased Fuel Oil as a Start-up Fuel Only in the Facility's Cement Kiln

The Department has reviewed the request for a construction permit amendment that Mr. Tom Mountain provided in a letter received on March 23, 1993. The request was for Florida Crushed Stone Company's (FCSC) cement kiln to be permitted to fire a storage tank blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only; and, the maximum on-specification used oil in the final on-specification used oil-purchased fuel oil storage tank blend shall not exceed 15%, by volume. Based on a review of the request and discussions with the Department's Southwest District and the Hernando County Planning Department representatives, the request is deemed acceptable. Therefore, the following Specific Conditions and Attachments will be added:

SPECIFIC CONDITION:

No. 19. (new)

The following conditions apply to the firing of a blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only by FCSC's cement kiln:

- o Mr. Tom Mountain's letter with enclosures dated March 18, 1993, and received by the Department on March 23, 1993, is incorporated by reference.
- o The on-specification used oil that will be blended with the purchased fuel oil in the cement kiln's storage tank shall be only from the used oil storage tanks located at the FCSC's Greg Mine and CPL Plant mobile shops.

# DRAFT

Mr. Randy Thompson  
 Amendment to AC 27-222095 (PSD-FL-091D)  
 November 15, 1993  
 Page 2

- avg fuel -*
- o The maximum on-specification used oil shall not exceed 15%, by volume, of the final on-specification used oil-purchased fuel oil storage tank blend.
  - o The cement kiln shall be preheated using virgin fuel oil and/or on-specification used oil with a total sulfur content not to exceed 1.5%, by weight. The constituents of the on-specification used oil shall not exceed the following associated allowable levels, as stipulated and defined in 40 CFR 266.40 (July 1, 1992 version), which is adopted by reference in Rule 17-730.181, F.A.C.:

Constituent Maximum Allowable Concentration

Cadmium	2 ppm
Arsenic	5 ppm
Chromium	10 ppm
Lead	100 ppm
Total Halogens	1000 ppm

- o Analysis and recordkeeping shall be in accordance with 40 CFR 266.43(b)(1) and (6).
- o A sample shall be taken from the outlet of the blend tank on the first working day (i.e., Monday-Friday; exceptions: holidays) of each month; and, the sampling container shall be adequate to hold 12 equal samples. The sampling period shall be January thru December. At the end of the sampling period, the aggregate sample shall be analyzed using the following test methods:

<u>Parameter</u>	<u>Unit</u>	<u>Test Method</u>
Cadmium	ppm	EPA SW-846(3040-7130)
Arsenic	ppm	EPA SW-846(3050-7061)
Chromium	ppm	EPA SW-846(3040-7190)
Lead	ppm	EPA SW-846(3040-7420)
Total Halogens	ppm	ASTM E442
Sulfur	%	ASTM D129
Flashpoint	°F	ASTM D93
Heat of Combustion	Btu/gal	D287
Density	lbs/gal	

Note: Other test methods may be used only after receiving written approval from the Department.

- o The results of the analyses of the aggregate sample shall be submitted to the Department's Southwest District and the Hernando County Planning offices by January 31 of the following year.

# DRAFT

Mr. Randy Thompson  
Amendment to AC 27-222095 (PSD-FL-091D)  
November 15, 1993  
Page 3

- o The dates and quantities of both on-specification and purchased fuel oil delivered/transferred to the cement kiln's storage tank shall be reported quarterly in a report to the Department's Southwest District and the Hernando County Offices.

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Planning

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This letter must be attached to the construction permit, No. AC 27-222095, and federal permit PSD-FL-091 (PSD-FL-091D), and shall become a part of the permits.

Sincerely,

---

Howard L. Rhodes  
Director  
Division of Air Resources Management

HLR/rbm

Attachments

cc: B. Thomas, SW District  
D. Beason, Esq., DEP  
J. Bunyak, NPS  
J. Harper, EPA  
C. Hetrick, HCBCC  
A. Cleveland, Esq., OHF&C  
T. Mountain, FCSC



**FLORIDA CRUSHED STONE COMPANY**  
CEMENT / POWER / LIME PLANT

November 17, 1993

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

RE: Used Oil Amendment: AC27-222095 (PSD - FL 091D)

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Sincerely,

Tom Mountain  
Environmental Manager

TM:wf

cc: K. Liles, Hernando County Planning Department  
A. Cleveland: Ortol, Hoffman, Fernandez & Cole

Post-It™ brand fax transmittal memo 7871		# of pages 4
To	KATHY LILES	
From	TOM MOUNTAIN	
Co.	HERNANDO COUNTY	
Dept.	PLANNING DEPT.	
Fax #	754-4420	
Phone #	(904) 799-7881	(904) 796-6881

**OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.**

2700 Blair Stone Road  
Post Office Box 6507  
Tallahassee, Florida 32314-8507

TELEPHONE (904) 877-0099

FACSIMILE (904) 877-0981

**FACSIMILE COVER SHEET**

DATE: 11/18/93 CLIENT NO. 1579

TO: Larry Jennings / Kelly Liles FAX NO. 904/754-4420

FROM: Tony Cleveland

4 PAGES, INCLUDING COVER SHEET  
ARE BEING TRANSMITTED FOR THE  
FOLLOWING REASON(S).

- AS WE DISCUSSED
- AS REQUESTED
- FOR YOUR INFORMATION
- FOR YOUR COMMENTS
- FOR YOUR APPROVAL

- HARD COPY WILL BE SENT:**
- VIA REGULAR MAIL
  - VIA OVERNIGHT MAIL
  - VIA FACSIMILE ONLY

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*This facsimile message may contain privileged and confidential information intended only for the individual named above. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution, or copying of this communication is prohibited. If this communication was received in error, please immediately notify us by telephone and return the original message to us at the address above.*

*If you do not receive all of the pages or if they are not legible, please call (904) 877-0099 and ask to speak with Sharon.*

11/18/93

15:57

OERTEL, HOFFMAN ET AL

002

**OERTEL, HOFFMAN, FERNANDEZ & COLE, P. A.**

ATTORNEYS AT LAW

SUITE C

2700 BLAIR STONE ROAD  
TALLAHASSEE, FLORIDA 32301

MAILING ADDRESS:

POST OFFICE BOX 0807  
TALLAHASSEE, FLORIDA 32314-0807TELEPHONE (904) 877-0000  
FACSIMILE (904) 877-0001NORMAN H. HORTON, JR.  
OF COUNSELJOHN H. MILLIGAN  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BARI)J. N. SUBRAMAN, PH. D., P. E.  
ENVIRONMENTAL CONSULTANT  
(NOT A MEMBER OF THE FLORIDA BARI)M. CHRISTOPHER BRYANT  
R. L. GALESH, JR.  
C. ANTHONY CLEVELAND  
TERRY COLE  
ROBERT G. DOWNIE, II  
SEGUNDO J. FERNANDEZ  
KENNETH F. HOFFMAN  
KENNETH G. OERTEL  
PATRICIA A. RENOVITCH  
SCOTT SHIRLEY  
THOMAS G. TOMABELLO  
W. DAVID WATKINS  
TIMOTHY P. ATKINSON**MEMORANDUM****BY FACSIMILE****ATTORNEY-CLIENT COMMUNICATION  
PRIVILEGED AND CONFIDENTIAL**

**TO:** Larry Jennings  
Kathy Liles

**FROM:** Oertel, Hoffman, Fernandez & Cole, P.A.

**RE:** Florida Crushed Stone Used Oil Amendment

**DATE:** November 18, 1993

We have received and reviewed a copy of the proposed amendment for Florida Crushed Stone's DEP air permit which would authorize the utilization of used oil. Although the draft permit did not specify the 100 degrees Fahrenheit minimum flash point limit required by the used oil rule (40 CFR 266, F.A.C. 17-730.181), Bruce Mitchell at the Florida Department of Environmental Protection has informed me that this was an oversight and that the 100 degree Fahrenheit limit would be added into a final permit. It is noted, however, that liquid waste which has a flash point of 140 degrees Fahrenheit or less is considered a characteristic hazardous waste. To ensure that any DEP permit issued and the County's current moratoria relating to hazardous waste are not in conflict, it is recommended that language comparable to that placed in the Asphalt Pavers, Inc. permit, at the County's request, be added to the Florida Crushed Stone permit. As you recall, that language required Asphalt Pavers, Inc. to agree that reclaimed fuel oil burned at its facility would not be a hazardous waste as defined by 40 CFR 261, and further that such burning would be in compliance with Section 403.769(3), Fla. Stat. That statute provides as follows:

(3) Permits [for used oil recycling facilities] shall  
under this section for the burning

11/18/93

15:58

OERTEL, HOFFMAN ET AL

003

Larry Jennings  
Kathy Liles

(a) a valid department air permit is in effect for the facility; and

(b) the facility burns used oil in accordance with applicable U.S. Environmental Protection Agency regulations, local government regulations, and the requirements of its department air permit. (emphasis added)

We also noted that the sampling required by the draft permit would occur once per month, but analysis of the sampling would occur only once a year. Such a sampling/analysis schedule would not allow a determination to be made that on any given month the fuel burned met the on-spec used oil "maximum allowable concentrations." Bruce Mitchell informed me that a similar concern had been raised by the DEP District Office, and that he intended to modify the draft permit to require monthly analysis. It is further noted, however, that while the draft permit requires that the "maximum on-specification used oil shall not exceed 15%, by volume, of the final on-specification used oil-purchased fuel oil storage tank blend," sampling and analysis is only required subsequent to mixing. Accordingly, the sampling presently mandated by the draft permit will not enable a determination to be made that the used oil itself was "on-specification" prior to the blending. Bruce Mitchell at DEP indicated that this was because the Department was only concerned about the mixture that was actually burned.

Kathy Liles' letter to us, dated May 18, 1993, stated that:

Mr. Mountain wishes to arrange the sampling of the used oil such that it occurs after the used oil has been mixed with bulk deliveries of Number 2 fuel oil. If the only used oil to be processed is oil generated on site, a change in this condition may be acceptable. However, it does raise the question as to how FCS will demonstrate that the ignitability requirement is met.

If the County takes the position that sampling and analysis should occur prior to mixing, and

11/18/93

15:58

CERTEL HOFFMAN ET AL

004

Larry Jennings  
Kathy Liles  
November 18, 1993  
Page 3

Lastly, the draft permit, as noted above, mandates that used oil may not exceed 15% of the blend. The draft permit, however, further states that the "cement kiln shall be preheated using virgin fuel oil and/or on-specification used oil . . ." The use of "and/or" implies that preheating could take place with "on-specification . . ."

PM  
15 Nov '93  
Tampa, FL



Lawton Chiles  
Governor

# Florida Department of Environmental Protection **RECEIVED**

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

NOV 17 1993  
Division of Air  
Resources Management

### WAIVER OF 90 DAY TIME LIMIT UNDER SECTIONS 120.60(2) and 403.0876, FLORIDA STATUTES

License (Permit, Certification) Application No.: A027-23188

Applicant's Name: Florida Crushed Stone Co.

The undersigned has read Sections 120.60(2) and 403.0876, Florida Statutes, and fully understands the applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Sections 120.60(2) and 403.0876, Florida Statutes, waives the right under Sections 120.60(2) and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Sections 120.60(2) and 403.0876, Florida Statutes. Said waiver is made freely and voluntarily by the applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 1st day of December 1993

The undersigned is authorized to make this waiver on behalf of the applicant.

Tom Mountain  
SIGNATURE

Tom Mountain  
NAME (PLEASE TYPE OR PRINT)  
Environmental Manager



I N T E R O F F I C E M E M O R A N D U M

Date: 16-Nov-1993 08:46am EST  
From: John Taylor TPA  
TAYLOR\_J@A1@TPA1  
Dept: Southwest District Offi  
Tel No: 813/744-6100  
SUNCOM: 408

TO: Bruce Mitchell TAL ( MITCHELL\_B @ A1 @ DER )

CC: John Taylor TPA ( TAYLOR\_J@A1@TPA1 )

Subject: FLORIDA CRUSHED STONE - KILN/CLINKER COOLER

BRUCE:

I HAVE BEEN TRYING TO FINALIZE PERMIT A027-231888 FOR SOME TIME NOW. THIS PERMIT IS INTENDED TO BE A NEW OPERATING PERMIT FOR THE CEMENT PLANT KILN/CLINKER COOLER/RAW MILL/LIMESTONE DRYER, LOCATED AT THE FLORIDA CRUSHED STONE FACILITY, HERNANDO COUNTY.

I HAVE TALKED WITH YOU A COUPLE OF TIMES ABOUT THIS PERMIT AND THE ASSOCIATED CONSTRUCTION PERMIT AC27-222095.

1. Preheating Oil: THE LAST TIME I TALKED WITH JOHN KOGLER, HE SAID THAT YOU WERE GOING TO AMEND AC27-222095 TO INCLUDE LANGUAGE TO ALLOW THE USE OF FUEL OIL FOR PREHEATING. IF YOU REMEMBER, THE EXISTING OPERATING PERMIT AND CONSTRUCTION PERMIT SAY NOTHING ABOUT USING PREHEAT OILS. JOHN KOGLER SAID YOU WERE GOING TO USE THE SAME WORDS FOR OIL USAGE AS I PRESENTLY HAVE IN THE DRAFT PERMIT A027-231888, SPECIFIC CONDITION NO. 11.

IF YOU ARE PROCEEDING DOWN THIS PATH, CAN YOU GIVE ME A TIME ESTIMATE ON WHEN THE AC AMENDMENT WILL BE RELEASED ?

2. Process Rates: THE SECOND UNRESOLVED AREA IS PROCESS RATES. THE CHANGE FROM THE PLUS/MINUS 10 PERCENT TOLERANCE IN THE OLD PERMIT TO THE NEW 90 - 100 PERCENT TESTING LANGUAGE HAS CONFUSED MANY AN APPLICANT. BASICALLY, TOM MOUNTAIN SAYS HE NEEDS THE EXTRA 10 PERCENT FOR "WORKING" PROCESS RATES. WITHOUT THE 10 PERCENT, HE SAYS HE WILL BE OUT OF COMPLIANCE. ALSO, A CHANGE TO CONTROLLING THE PREHEATER FEED RATE, IN LIEU OF THE 75 TONS PER HOUR OUTPUT RATE IS PROBABLY A BETTER METHOD. I WOULD LIKE TO RECOMMEND THAT THE AC AMENDMENT ALSO INCLUDE NEW RATES WHICH WILL AUTHORIZE THE ADDITIONAL 10 PERCENT. JOHN KOGLER, TOM MOUNTAIN AND I WILL BE HAPPY TO GIVE YOU EXACT NUMBERS.

OLD RATES: 75 TPH CEMENT PRODUCTION, 123.75 TPH KILN INPUT, 248 MM BTU/HR HEAT INPUT = 10.3 TPH (COAL).

ANY HELP IN THIS AREA WOULD BE APPRECIATED, SINCE BILL THOMAS  
WILL NOT AUTHORIZE THE USE OF HIGHER RATES AT THE DISTRICT LEVEL.

3. Tires: THE TIRE LAUGUAGE SEEMS OKAY AT THIS POINT.

THANKS

JOHN J. TAYLOR  
11/16/93

# DRAFT

November 15, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

~~Mr. Randy Thompson~~  
~~Environmental Department~~  
~~Florida Crushed Stone Company~~  
~~Post Office Box 490300~~  
~~Leesburg, Florida 34749-0300~~

Mr. Tom Mountain  
Environmental Manager  
Florida Crushed Stone Company  
Post Office Box 1508  
Brooksville, Florida 34605

Dear Mr. Thompson: Mountain:

Re: Amendment to the Construction Permit, No. AC 27-222095 (PSD-FL-091D), to Allow the Firing of a Storage Tank Blend of On-Site Generated On-Specification Used Oil with Purchased Fuel Oil as a Start-up Fuel Only in the Facility's Cement Kiln

The Department has reviewed the request for a construction permit amendment that Mr. Tom Mountain provided in a letter received on March 23, 1993. The request was for Florida Crushed Stone Company's (FCSC) cement kiln to be permitted to fire a storage tank blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only; and, the maximum on-specification used oil in the final on-specification used oil-purchased fuel oil storage tank blend shall not exceed 15%, by volume. Based on a review of the request and discussions with the Department's Southwest District and the Hernando County Planning Department representatives, the request is deemed acceptable. Therefore, the following Specific Conditions and Attachments will be added:

SPECIFIC CONDITION:

No. 19. (new)

The following conditions apply to the firing of a blend of on-site generated on-specification used oil with purchased fuel oil as a start-up fuel only by FCSC's cement kiln:

- o Mr. Tom Mountain's letter with enclosures dated March 18, 1993, and received by the Department on March 23, 1993, is incorporated by reference.
- o The on-specification used oil that will be blended with the purchased fuel oil in the cement kiln's storage tank shall be only from the used oil storage tanks located at the FCSC's Greg Mine and CPL Plant mobile shops.

# DRAFT

Mr. Randy Thompson  
 Amendment to AC 27-222095 (PSD-FL-091D)  
 November 15, 1993  
 Page 2

- o The maximum on-specification used oil shall not exceed 15%, by volume, of the final on-specification used oil-purchased fuel oil storage tank blend.
- o The cement kiln shall be preheated using virgin fuel oil and/or on-specification used oil with a total sulfur content not to exceed 1.5%, by weight. The constituents of the on-specification used oil shall not exceed the following associated allowable levels, as stipulated and defined in 40 CFR 266.40 (July 1, 1992 version), which is adopted by reference in Rule 17-730.181, F.A.C.:

Constituent Maximum Allowable Concentration

Cadmium	2 ppm
Arsenic	.5 ppm
Chromium	10 ppm
Lead	100 ppm
Total Halogens	1000 ppm

- o Analysis and recordkeeping shall be in accordance with 40 CFR 266.43(b) (1) and (6).
- o A sample shall be taken from the outlet of the blend tank on the first working day (i.e., Monday-Friday; exceptions: holidays) of each month; and, the sampling container shall be adequate to hold 12 equal samples. The sampling period shall be January thru December. At the end of the sampling period, the aggregate sample shall be analyzed using the following test methods:

<u>Parameter</u>	<u>Unit</u>	<u>Test Method</u>
Cadmium	ppm	EPA SW-846(3040-7130)
Arsenic	ppm	EPA SW-846(3050-7061)
Chromium	ppm	EPA SW-846(3040-7190)
Lead	ppm	EPA SW-846(3040-7420)
Total Halogens	ppm	ASTM E442
Sulfur	%	ASTM D129
Flashpoint	°F	ASTM D93
Heat of Combustion	Btu/gal	D287
Density	lbs/gal	

Note: Other test methods may be used only after receiving written approval from the Department.

- o The results of the analyses of the aggregate sample shall be submitted to the Department's Southwest District and the Hernando County Planning offices by January 31 of the following year.

# DRAFT

Mr. Randy Thompson  
 Amendment to AC 27-222095 (PSD-FL-091D)  
 November 15, 1993  
 Page 3

- o The dates and quantities of both on-specification and purchased fuel oil delivered/transferred to the cement kiln's storage tank shall be reported quarterly in a report to the Department's Southwest District, ~~and the Hernando County Offices~~ *and made available to the Hernando County Planning Department upon request.*
- Attachments to be Incorporated:

- o Mr. C. H. Fancy's letter dated January 26, 1993.
- o Mr. Tom Mountain's letter with enclosure received March 23, 1993.
- o Mr. C. H. Fancy's letter dated April 1, 1993.
- o Mr. Tom Mountain's letter and processing fee received April 14, 1993.
- o 40 CFR (July, 1992 version).

This letter must be attached to the construction permit, No. AC 27-222095, and federal permit PSD-FL-091 (PSD-FL-091D), and shall become a part of the permits.

Sincerely,

\_\_\_\_\_  
 Howard L. Rhodes  
 Director  
 Division of Air Resources Management

HLR/rbm

Attachments

cc: B. Thomas, SW District  
 D. Beason, Esq., DEP  
 J. Bunyak, NPS  
 J. Harper, EPA  
 C. Hetrick, HCBCC  
 A. Cleveland, Esq., OHF&C  
 T. Mountain, FCSC



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

## FAX TRANSMITTAL SHEET

TO: Tom Mountain

DATE: 11-15-93 PHONE: 904-796-6281

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: proposed language on used oil

MESSAGE CONFIRMATION

NOV-15-'93 MON 09:55

TERM ID:

P-8899

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
059	11-15	09:52	00:02:56	904 796 6281		04	00

PHONE: 904-921-9506

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.



# Florida Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

## FAX TRANSMITTAL SHEET

TO: Kathy Liles

DATE: 11-15-93

PHONE: 904-754-4420

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

Kathy Liles  
754-4420  
Tom Mountain  
796-6281

COMMENTS: Proposed amend. for FCSC to be allowed to burn used-oil as a start-up fuel as a blend with purchased oil

MESSAGE CONFIRMATION

NOV-15-'93 MON 09:51

TERM ID:

P-9999

TEL NO:

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
058	11-15	09:48	00:02:43	1 904 754 4420		04	00

PHONE: 904-921-9506

FAX NUMBER: 904/922-6979

If there are any problems with this fax transmittal, please call the above phone number.

# DRAFT

November 15, 1993

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Mr. Randy Thompson  
Environmental Department  
Florida Crushed Stone Company  
Post Office Box 490300  
Leesburg, Florida 34749-0300

Dear Mr. Thompson:

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Mr. Randy Thompson  
Amendment to AC 27-222095 (PSD-FL-091D)  
November 15, 1993  
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Total Halogens	ppm	ASTM E442
Sulfur	%	ASTM D129
Flashpoint	°F	ASTM D93
Heat of Combustion	Btu/gal	D287
Density	lbs/gal	

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# DRAFT

Mr. Randy Thompson  
Amendment to AC 27-222095 (PSD-FL-091D)  
November 15, 1993  
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*Planning*

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Sincerely,

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Howard L. Rhodes  
Director  
Division of Air Resources Management

HLR/rbm

Attachments

cc: B. Thomas, SW District  
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