

RECEIVED

JUN 23 1993

Division of Air Resources Management

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

AC 27-222095


License (Permit, Certification) Application No. (PSD-FL-091D)

Applicant's Name: Florida Crushed Stone Co.

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

This waiver shall expire on the 21 day of September 1993.

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



Signature

Tom Mountain

Name (Please Type or Print)

*Copied
Kathy Liles
6/21/93*

Revised April, 1990

cc: Bill Thomas, SWD } - 7-6-93 RA
Bauer

Spoke to Tony Cleveland (OH, A/C) - he said that he and Hernandez Co. had copies of this. 7-6-93 RA

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

Date: 18-Jun-1993 09:26am EST
From: Dea Wahlen TAL
WAHLEN_D
Dept: Office General Counsel
Tel No: (904)488-9730
SUNCOM: 278-9730

TO: Duane Revell TPA
TO: Patty Adams TAL

(REVELL_D @ A1 @ TPA)
(ADAMS_P)

CC: Bruce Mitchell TAL

(MITCHELL_B)

Subject: Florida Crushed Stone

On June 17, 1993, we received from C. Anthony Cleveland, counsel for Hernando County, that county's "request for administrative point of entry to formal administrative proceedings to challenge the Department's decision concerning Permit Nos. AC27-222095 and PSD-FL-091C."

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

Date: 18-Jun-1993 09:24am EST
From: Dea Wahlen TAL
WAHLEN_D
Dept: Office General Counsel
Tel No: (904)488-9730
SUNCOM: 278-9730

TO: Bruce Mitchell TAL

(MITCHELL_B)

Subject: I goofed

Obviously, the e-mail about Florida Crushed Stone I sent minutes ago was in error. Will be sending the same message to Hernando County.

Darn. What a way to end the week.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

RECEIVED

JUN 17 1993

IN RE: FLORIDA CRUSHED STONE COMPANY
REQUEST FOR MODIFICATION OF
PERMIT NOS. AC27-222095 and
PSD-FL-091C

Division of Air
Resources Management

OGC CASE NO. _____

REQUEST FOR ADMINISTRATIVE POINT OF ENTRY

HERNANDO COUNTY, by and through the undersigned attorney, and pursuant to the authority cited herein, hereby requests an administrative point of entry to formal administrative proceedings to challenge the Department's decision in the above-styled proceedings, if necessary, and in support thereof states as follows:

1. On March 23, 1993, Florida Crushed Stone Company (FCS) filed with the Department of Environmental Regulation (DER or Department) a letter requesting amendment of DER Permits AC27-222095 and PSD-FL-091C to authorize the continuous utilization/firing of on-site used oil. FCS proposed to fire the oil in the facility's kiln at a maximum firing rate of not more than 15% of the total Btu heat input from fuel oil use during startup of the unit. See Attachment "A".

2. Subsequent to filing of the request, representatives of Hernando County contacted FCS regarding the potential permit modification. As a result, it appears that the County and FCS are in agreement regarding certain conditions relevant to whether or not used oil to be utilized as proposed by FCS would constitute a hazardous waste as defined in 40 C.F.R. 261.21(1).

3. Subsequently, on May 21, 1993, FCS contacted Department staff and requested that their application for modification of the permit as referenced herein be placed "on hold" to allow FCS to determine whether it wished to meet all of the Department's proposed

conditions. By letter of May 24, 1993, the County requested Department notification in the event that FCS decides to move ahead with its request. See Attachment "B".

4. FCS has not provided any written waiver of the 90-day permit activity time clock, as provided in Section 120.60(2), Florida Statutes. The County is concerned that, in absence of a written waiver, an argument may be created that the requested permit modification was issued by default through expiration of the 90-day time clock in Section 120.60(2), Florida statutes. In any such instance, pursuant to its rights under Section 120.57(1), Florida Statutes, and Section 403.412(5), Florida Statutes, the County wishes to preserve its right to challenge any departmental decision-making, notwithstanding the operation of Section 120.60(2), Florida Statutes.

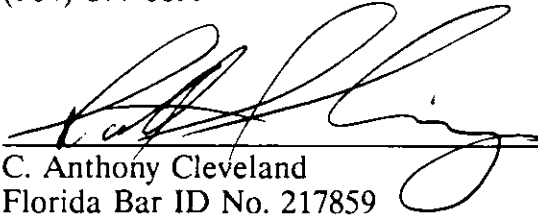
5. In addition, although it appears that the County and FCS are in agreement as to permit conditions of significance to the County's interests, the County wishes to preserve its right to review and challenge any and all proposed agency action in the event that it fails to incorporate the County's understanding with FCS. Thus, this request is filed in an abundance of caution to preserve the County's rights.

6. Accordingly, pursuant to its rights under the Administrative Procedures Act and Florida Administrative Code Rule 17-103.155(5), Hernando County specifically requests that it be provided with notice of intended agency action and a clear point of entry to formal administrative proceedings so that it may, if necessary, file a petition for administrative proceedings with respect to the Department's proposed action.

Respectfully submitted,

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

2700 Blair Stone Road, Suite C
Post Office Box 6507
Tallahassee, Florida 32314-6507
(904) 877-0099


For C. Anthony Cleveland
Florida Bar ID No. 217859

Attorneys for HERNANDO COUNTY

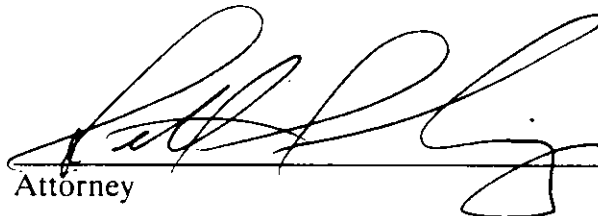
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of the foregoing have been furnished by Hand Delivery to the Agency Clerk, Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and that a true copy of the foregoing has been furnished by United States Mail this 17th day of June, 1993 to:

Dan Thompson, General Counsel
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Bruce Mitchell, P.E. (HAND DELIVERY)
Bureau of Air Regulation
Department of Environmental Regulation
111 South Magnolia Ave.
Tallahassee, FL 32301

Thomas Mountain, Environmental Manager
Florida Crushed Stone Company
Post Office Box 490300
Leesburg, FL 34749-0300


Attorney

SS:cjb/1579.poe



FLORIDA CRUSHED STONE COMPANY
CEMENT / POWER / LIME PLANT

March 18, 1993

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

RECEIVED

MAR 23 1993

Division of Air
Resources Management

Re: Used Oil Utilization/Firing

Mr. Mitchell,

As previously discussed, the FCS Cement Plant located in Hernando County, Florida is considering utilizing the used oil generated at the FCS Brooksville Operations for firing the kiln during start up operations. In response to Mr. Clair Fancy's letter dated January 26, 1993, the following information is provide for you review.

- * The used oil to be utilized would come from the used oil tanks located at the FCS Gregg Mine and the FCS CPL Plant mobile shops only. These sources contain a mixture of mobile, gearbox and bearing oils.
- * The used oil would be mixed with purchased fuel oil used to warm up the kiln in start up operations. The fuel oil tank is a 20,000 gallon tank; inventory is kept above 13,000 gallons at all time. Maximum total used oil generated for both sources combined averages at 30,000 gallons a year. Average fuel use in kiln warm up operations is 300,000 gallons a year. Monthly use of fuel oil varies between 17,000 gals to 32,000 gals. During warm up operations fuel oil firing rates range from 120 gph; and gradually increase to 600 gph during the last two hours of a start up. The maximum rate of used oil fired during warm up operations would be between 10 to 15 percent.
- * The heating value of the used oil is roughly the same as for the purchased fuel oil; therefore, the percent of heat input of the used oil would equal the use rate percentage and would range from 10 to 15 percent.

Page 2.

- * As mentioned above, the only source that will fire/utilize the used oil is the kiln during start up operations.
- * Analyses of the used oil generated at both sources are included. According to the analyses, the used oil from both sources meets RCRA specifications for the fuel recovery of used oil according to 40 CFR 266.4.
- * The two sources mentioned will be the only used oil sources. No off-site generated used oil will be used.

Based on the information provided above, the FCS Cement Plant requests that FDER permits AC27-222095 and PSD-FL-091C be amended to authorize the continuous utilization/firing of on-site used oil in the facility's kiln at a maximum utilization/firing rate not to exceed 15% of the total Btu heat input derived from the use of fuel oil during start up operations. As a specific condition to guarantee compliance, the FCS Cement Plant would be required to record and maintain on file the amount of used oil and purchased fuel oil transferred to the Cement Plant fuel oil tank each month. FCS would be allowed to transfer used oil in amount equal to or less than 15% of the fuel oil purchased at the time in which the purchased fuel oil is delivered. This data would be reported on a quarterly basis in the fuel use and analysis data report currently submitted to the FDER Southwest District Office Air Section.

Please contact me at (904) 799-7881 ext. 205 should have any questions.

Sincerely,



Tom Mountain
Environmental Manager

MAR-02-1993 16:38 FROM ELECTRIC FUELS - LAB TO 19047966281 P.03



Progress Environmental Laboratories

4420 Pendola Point Road
Tampa, Florida 33619
(813) 247-2808
FAX: (813) 246-1537

- CERTIFICATE OF ANALYSIS -
(HRS #B84207 and FDER CompQap #900306G)

To: Florida Crushed Stone
10311 Cement Plant Road
Brooksville, FL 34601

Report Date: 03/02/93

Attn: Butch Wheeler

PEL LAB # : 504236
Client ID : Motor Oil; Gregg Mine
Project ID :
Location : Gregg Mine
Matrix : Oil

Collection Information:
Sample Date: 02/09/93
Sample Time:
Sampled By : K.D.

ND = Less than MDL

***NOTE: EPA Method 602 analyzed on 02/26/93 by B.S.

Lab#	Parameter	Method	Results	Units	MDL
504236	Barium	EPA 6010	12.19	ug/g	0.96
	Cadmium	EPA 6010	0.70	ug/g	0.35
	Chromium	EPA 6010	1.23	ug/g	0.79
	Silver	EPA 6010	ND	ug/g	1.23
	Arsenic	EPA 7060	ND	ug/g	0.21
	Lead	EPA 7421	4.81	ug/g	0.07
	Mercury	EPA 7471	ND	ug/g	0.20
	Selenium	EPA 7740	0.24	ug/g	0.09
	Carbon	LECO CHN 600	77.02	Wt%	0.00
	Hydrogen	LECO CHN 600	12.91	Wt%	0.00
	Total Nitrogen	LECO CHN 600	0.20	Wt%	0.00

Respectfully submitted, Vincent M. Giampa
Vincent M. Giampa, Laboratory Supervisor

MAR-02-1993 16:38 FROM ELECTRIC FUELS - LAB TO 19047966281 P.02



Progress Environmental Laboratories

4420 Pendola Point Road
Tampa, Florida 33619
(813) 247-2806
FAX: (813) 248-1927

- CERTIFICATE OF ANALYSIS -
(HRS #E84207 and FDER CompGap #900306G)

To: Florida Crushed Stone
10311 Cement Plant Road
Brooksville, FL 34601

Report Date: 03/02/93

Attn: Butch Wheeler

PBL LAB # : 504235
Client ID : Motor Oil; C.P.L.
Project ID :
Location : C.P.L.
Matrix : Oil

Collection Information:
Sample Date: 02/09/93
Sample Time:
Sampled By : K.D.

ND = Less than MDL

***NOTE: EPA Method 602 analyzed on 02/26/93 by B.S.

Lab#	Parameter	Method	Results	Units	MDL
504235	Barium	EPA 6010	ND	ug/g	0.77
	Cadmium	EPA 6010	ND	ug/g	0.28
	Chromium	EPA 6010	ND	ug/g	0.63
	Silver	EPA 6010	ND	ug/g	0.98
	Arsenic	EPA 7060	ND	ug/g	0.24
	Lead	EPA 7421	7.14	ug/g	0.08
	Mercury	EPA 7471	ND	ug/g	0.20
	Selenium	EPA 7740	0.12	ug/g	0.07
	Carbon	LECO CHN 600	84.47	wt%	0.00
	Hydrogen	LECO CHN 600	13.31	wt%	0.00
	Total Nitrogen	LECO CHN 600	0.10	wt%	0.00

Respectfully submitted, Vincent M. Giampa
Vincent M. Giampa, Laboratory Supervisor



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 26, 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: Inquiry on the Utilization/Firing of Used Oil

On January 19, 1993, Mr. Tom Mountain spoke with Mr. Bruce Mitchell on the potential use of "used oil". Since the facility is not permitted to fire/utilize "used oil", then submit the following information to the Department's Bureau of Air Regulation and the permitting requirements will be established and you will be advised:

- o What is the source(s) of the "used oil"?
- o What is the maximum quantity of "used oil" that will be fired/utilized (i.e., gals/hr) on a per source basis?
- o On a per source basis, what is the "percent" of the heat input that will be supplemented by the "used oil"?
- o Identify the source or sources that will potentially fire/utilize the "used oil"?
- o Provide an elemental and ultimate analysis of the "used oil" that you plan on firing/utilizing.
- o Will there be any "used oil" generated off-site for this proposal? If so, please explain fully.

If there are any questions, please call Mr. Bruce Mitchell at (90)488-1344 or write to me at the above address.

Sincerely,


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

CHF/BM/rbm

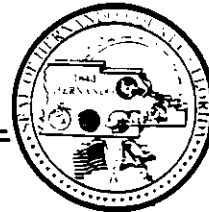
cc: B. Thomas, SWD
C. Hetrick, HCBCC
D. Beason, Esq., DER
T. Mountain, FCSC

Board of County Commissioners

Hernando County

PLANNING DEPARTMENT

Government Center / Administration Building
20 North Main Street, Room 262
Brooksville, Florida 34601-2807



Planning - (904) 754-4057
Fax - (904) 754-4420

May 24, 1993

MAY 27 1993

Mr. Bruce Mitchell
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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

Dear Mr. Mitchell:

Mr. Larry Jennings, Planning Department Director, and I met with Mr. Tom Mountain of Florida Crushed Stone on Friday, May 21. At that time, Mr. Mountain informed us to hold up our review of the letter of modification to burn on-spec used oil as Florida Crushed Stone was unsure it wished to meet the modification's conditions. Staff intends to inform the Board of County Commissioners on May 25 that the company has requested that our review be suspended at this time.

The County is concerned that if action is anticipated at a later date, our opportunity to comment remains. To this end, I am asking that DEP notify the County should Florida Crushed Stone decide to move ahead with its request.

Your assistance is appreciated.

Sincerely,

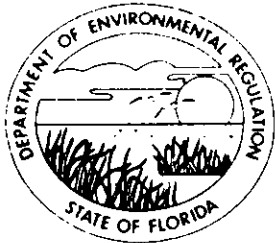
Katherine P. Liles
Environmental Planner

KPL/mfs

pc: Charles B. Hetrick, County Administrator
Tony Cleveland, OHFC

E:\WPDATA\KATHYL\FCSOIL.LTR

Attachment "B"



(F. H. C. C. C.)

Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

June 8, 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: Request to Fire a Used Oil-Purchased Oil Blend as a Start-up Fuel in the Clinker Kiln

The Department has reviewed Mr. Tom Mountain's letter received on March 23, 1993, which requested a permit amendment to fire a used oil-purchased oil blend as a start-up fuel in the facility's clinker kiln. A draft of the Department's Intent to Issue an amendment to construction permit, No. AC 27-222095, was distributed on May 14, 1993, to the Southwest District, and on May 17, 1993, to Hernando County. On May 21, 1993, the Bureau of Air Regulation received a call at 10:21 a.m., from Mr. Tom Mountain, requesting that the draft letter be held from actual distribution until further notice (Mrs. Kathy Liles of Hernando County received the same request). Due to advisement from legal counsel, the Department will need a response from you, by June 21, 1993, either withdrawing the amendment request or receipt of a completed "Waiver of 90 Day Time Limit" form (copy enclosed).

If there are any questions, please call Mr. Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,

for *John C. Brown Jr.*
C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/BM/rbm

Enclosure

cc: B. Thomas, SWD
D. Beason, Esq., DER

C. Hetrick, HCBCC
T. Mountain, FSCS

P 230 523 746



Receipt for Certified Mail

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

PS Form 3800, June 1991

Sent to Mr. Randy Thompson, Fla.	
Street and No. Crushed Stone Co.	
P. O. Box 490300	
P. O. State and ZIP Code Leesburg, FL 34749-0300	
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 Mailed: 6-8-93 Permit: Used Oil	

Is your RETURN ADDRESS completed on the reverse side?

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 will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.	
3. Article Addressed to: Mr. Randy Thompson Environmental Department Florida Crushed Stone Company P. O. Box 490300 Leesburg, FL 34749-0300		4a. Article Number P 230 523 746	
5. Signature (Addressee)		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	
6. Signature (Agent) Bill Westcott		7. Date of Delivery 6-11-93	
8. Addressee's Address (Only if requested and fee is paid)			

Thank you for using Return Receipt Service.

HERNANDO COUNTY PLANNING DEPARTMENT

20 N. Main Street, Room 262

Brooksville, FL 34601

904-754-4057

FAX TRANSMITTAL

DATE: 5/24/93

TRANSMITTAL TO: Bruce Mitchell

COMPANY/AGENCY: DEP

FAX NUMBER: 904-487-4938

BRIEF SUBJECT: FCS - Used oil

NUMBER OF PAGES INCLUDING TRANSMITTAL SHEET: 2

FROM: Kathy Likes

AGENCY: HERNANDO COUNTY PLANNING DEPARTMENT

FAX: 904-754-4420

NOTES: _____

MLG

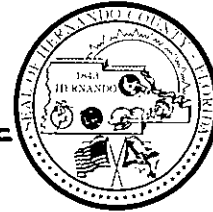
If you do not receive the number of pages listed above, please call 904-754-4057. Thank you.

Board of County Commissioners

Hernando County

PLANNING DEPARTMENT

Government Center / Administration Building
20 North Main Street, Room 262
Brooksville, Florida 34601-2807



Planning - (904) 754-4057
Fax - (904) 754-4420

May 24, 1993

RECEIVED

MAY 27 1993

Division of Air
Resources Management

Mr. Bruce Mitchell
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Mitchell:

Mr. Larry Jennings, Planning Department Director, and I met with Mr. Tom Mountain of Florida Crushed Stone on Friday, May 21. At that time, Mr. Mountain informed us to hold up our review of the letter of modification to burn on-spec used oil as Florida Crushed Stone was unsure it wished to meet the modification's conditions. Staff intends to inform the Board of County Commissioners on May 25 that the company has requested that our review be suspended at this time.

The County is concerned that if action is anticipated at a later date, our opportunity to comment remains. To this end, I am asking that DEP notify the County should Florida Crushed Stone decide to move ahead with its request.

Your assistance is appreciated.

Sincerely,

Katherine P. Liles
Environmental Planner

KPL/mfs

pc: Charles B. Hetrick, County Administrator
Tony Cleveland, OHFC

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KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 521-93-03

May 19, 1993

RECEIVED
MAY 24 1993
Division of Air
Resources Management

Mr. Chi-Sun Lee
Florida Department of
Environmental Regulation
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

Subject: WTDF Performance Test
Southdown, Inc. dba Florida Mining & Materials
Brooksville, Florida

Dear Mr. Lee:

As per your telephone conversation with N. Mason Joye, I would like to confirm that the performance test to evaluate the use of whole-tire derived fuel (TDF) at Florida Mining & Materials has been scheduled for June 8-9, 1993. The performance test will be conducted in accordance with the test protocol approved by the Department.

If you have any questions concerning this schedule, please do not hesitate to give me a call.

Very truly yours,

KOOGLER & ASSOCIATES

Megan E. Miner

c: ~~Mr. Clair Fancy, FDER, Tallahassee~~
~~Mr. Bruce Mitchell, FDER, Tallahassee~~
Ms. Jewell Harper, EPA, Atlanta
Mr. John Bunyak, National Park Service
Mr. Charles Hetrick, HCBC
Mr. D. Beason, Esq., OGC, FDER
Ms. Anetha Lue, P.E., Southdown, Inc.
Mr. Armajit Gill, P.E., Southdown, Inc.
Mr. Don Kelly, Florida Mining & Materials
Mr. Tony Cleveland, Esq., Oertel, Hoffman et al
Mr. David Dee, Esq., Carlton, Fields et al
Mr. David Buff, KBN Engineering, Gainesville



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

FAX TRANSMITTAL FORM

TO: CLAIR FANCY, FDER TALLAHASSEE
BRUCE MITCHELL, FDER TALLAHASSEE
CHI-SUN LEE, FDER TAMPA
CHARLES HETRICK, HERNANDO COUNTY
D. BEASON, OGC, FDER TALLAHASSEE
JEWELL HARPER, EPA, ATLANTA
JOHN BUNYAK, NATIONAL PARK SERVICE
ANETHA LUE, SOUTHDOWN
ARMAJIT GILL, SOUTHDOWN
DON KELLY, FLORIDA MINING & MATERIALS
TONY CLEVELAND, OERTEL, HOFFMAN ET AL
DAVID DEE, CARLTON, FIELDS ET AL
DAVID BUFF, KBN ENGINEERING

FROM: Ms. Megan Miner

PROJECT: 521-93-03

SENT BY: Sonjai

DATE: 19 May 93

FAX PHONE: 904-377-5822

This text being transmitted consists of 1 pages plus this one.

REMARKS: _____

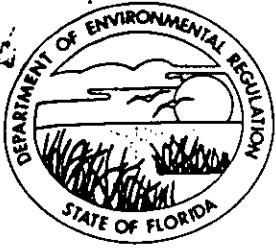
TO: Virginia B. Wetherell
FROM: Howard L. Rhodes
DATE: May 18, 1993
SUBJ: Amendment Letter to the Construction Permit
AC 27-222095 and PSD-FL-091 (PSD-FL-091D)
Florida Crushed Stone Company: Cement Kiln

Attached for your approval and signature is a letter amendment authorizing the firing of a storage tank blend of on-site generated on-spec used oil with purchased fuel oil as a start-up fuel only in Florida Crushed Stone Company's (FCSC) cement kiln. The existing kiln processes raw material to produce clinker with the primary heat source being coal, and supplemented with used tires.

Over the past couple of years, FCSC has conducted tests for a number of pollutants. Each test was conducted under a Department Type I audit (with Department personnel personally witnessing the sampling and analysis). The test results have been evaluated and it appears that there were no increases in the pollutant emissions when comparing a baseline test (coal) and the coal-shredded tire tests. The tests were conducted to establish actual pollutant emissions and future permitting requirements.

It is also important to note that FCSC is the proposed market for tire derived fuel from a "Waste Tire Site Abatement Contract", which would be granted by the Division of Waste Management. The potential waste tire site has over 250,000 tires. This will be the first contract to be authorized to date for which the disposal method is combustion.

I recommend your approval and signature.



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

FAX TRANSMITTAL SHEET

TO: Kathy Hiles

DATE: 5-17-93 PHONE: 904-754-4420

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

FROM: Bruce Mitchell

DEPARTMENT OF AIR RESOURCES MANAGEMENT
MESSAGE CONFIRMATION

MAY-17-'93 MON 14:53

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
041	05-17	14:50	00'02'48	1 904 754 4420		04	00

COMMENTS: Draft amend. pkg for FCSC's request to fire
on-site generated on-spec used oil in a blend with
purchased fuel oil in the cement kiln as a
start-up fuel only. Please respond on any critiques
by the end of the week if possible. *John*

5-17-93
2:53 pm

John K. Hiles -

FAX 904-754-4420

on the way

Bruce Mitchell

PHONE: 904-488-1344

FAX NUMBER: 904/922-6979

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

- o E-mailed to BT/HK/FMcN [5-14-93 p.m. (~5:00)]
- o Spoke to Jim McDonald - OK [5-17-93 @ ~2:15 pm]
- o Called Tony Cheneault's office - to send a runner to pick up draft (5/17/93)
- o FAX'd to Kathy Likas [5/17/93]
- o Spoke to Tom Mountain - status ✓

DRAFT

May 18, 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-Spec 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-spec used oil with purchased fuel oil as a start-up fuel only; and, the maximum on-spec used oil in the final on-spec 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 (on-spec) 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-spec 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 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)
May 18, 1993
Page 2

- o The maximum on-spec used oil shall not exceed 15%, by volume, of the final on-spec used oil-purchased fuel oil storage tank blend.
- o The on-spec used oil-purchased fuel oil blend is to be used only for start-up of the cement kiln.
- o The usage of on-spec used oil shall be in accordance with all applicable provisions of 40 CFR 266, Subpart E (July, 1991 version), in accordance with Florida Administrative Code (F.A.C.) Rules 17-212.400(1)(c) and 17-730.181;
- o The on-spec used oil shall be as defined in 40 CFR 266.40 (July, 1991 version) and shall not exceed the constituent/property levels as specified in 40 CFR 266.40(e); and, total halogens shall be limited to a maximum of 1,000 ppmvd.
- o Analysis and recordkeeping shall be in accordance with 40 CFR 266.43(b)(1) and (6).
- o An ultimate analysis of each delivery/transfer of on-spec used oil to the cement kiln's fuel oil storage tank shall be required and shall establish, at a minimum, the levels of the sulfur content (weight %), metals on a constituent (i.e., arsenic, cadmium, chromium, lead, vanadium, etc.) and weight percent basis, moisture content, total halogens in ppmvd, etc., using the appropriate ASTM Methods (i.e., ASTM D1552-83, ASTM D396-78, ASTM D129-64, etc.) and in accordance with F.A.C. Rule 17-297 and 40 CFR (July, 1991 version); and, the amount of each delivery/transfer of on-spec used oil shall be quantified and recorded; also, all records shall be kept on file for a minimum of three years.
- o The ignitability of the on-spec used oil shall be determined using one of the approved test methods pursuant to 40 CFR 261.21(1); and, a record shall be kept on file for a minimum of three years.
- o A record of each purchased fuel oil delivery/transfer to the cement kiln's storage tank, including the quantity delivered/transferred, shall be kept on file for a minimum of three years.
- o The dates and quantities of both on-spec 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.

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, 1991 version).

DRAFT

Mr. Randy Thompson
Amendment to AC 27-222095 (PSD-FL-091D)
May 18, 1993
Page 3

This letter amendment 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,

Virginia B. Wetherell
Secretary

VW/BM/rbm

Attachments

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



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

FAX TRANSMITTAL SHEET

TO: Bill Thomas / Jim McDonald

DATE: 5-13-93

PHONE: SC/⁷⁴⁴~~744~~ 6083

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 9

FROM: Bruce Mitchell

DIVISION OF AIR RESOURCES MANAGEMENT

COMMENTS: Documents on FESC's request to fire on-site
generated used oil in their kiln as a start-up
fuel. Please advise.
Flunko,
BBM

MESSAGE CONFIRMATION

MAY-13-1993 THU 08:58

TERM ID: DIV OF AIR RES MGMT F-9999

TEL NO: 904-922-6979

NO.	DATE	ST. TIME	TOTAL TIME	ID	DEPT CODE	OK	NG
005	85-13	08:52	00:05:49	913 630 6092		09	00

PHONE: SC/278-1344

FAX NUMBER: 904/922-6979

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



FLORIDA CRUSHED STONE COMPANY
CEMENT / POWER / LIME PLANT

April 7, 1993

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

Re: Request for Amendment to Permit used Oil Utilization/Firing
Florida Crushed Stone Co. / FCS Cement Plant.

Dear Patty,

As requested in your letter dated April 1, 1993, a check in the amount of \$250.00 in payment of the processing fee for the above referenced permit amendment request is included with this letter.

Please contact me at your convenience if there are any questions.

Sincerely,

A handwritten signature in black ink that reads "Tom Mountain". The signature is written in a cursive style with a large, looping initial 'T'.

Tom Mountain
Environmental Manager

copy: C. Allen
B. Mitchell

RECEIVED
DER - MAIL ROOM
1993 APR 14 AM 9:28



FLORIDA CRUSHED STONE COMPANY
CEMENT / POWER / LIME PLANT

April 7, 1993

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

Re: Request for Amendment to Permit used Oil Utilization/Firing
Florida Crushed Stone Co. / FCS Cement Plant.

Dear Patty,

As requested in your letter dated April 1, 1993, a check in the amount of \$250.00 in payment of the processing fee for the above referenced permit amendment request is included with this letter.

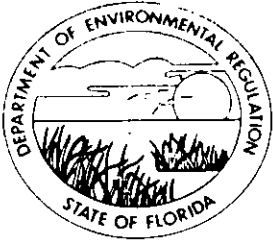
Please contact me at your convenience if there are any questions.

Sincerely,

Tom Mountain

RECEIVED
PER - MAIL ROOM
1003 APR 14 AM 9:28

FLORIDA CRUSHED STONE COMPANY		1031	2657
CPL CASH ACCOUNT PHONE 904 799-7881 P O BOX 1508 BROOKSVILLE, FL 34605		0617	63-134/631 BRANCH 134
		<i>April 7 1993</i>	
PAY TO THE ORDER OF	<i>F.D.E.R.</i>	\$	250.00
<i>Two hundred & fifty + ⁰⁰/₁₀₀</i>		DOLLARS	
Sun Bank and Trust Company Brooksville Office P.O. Box 156 Brooksville, FL 34605-0156			
FOR	<i>Permit Amendment (waste oil)</i>		<i>C. Thomas Kull</i>
⑈002657⑈ ⑆063101344⑆0134100006979⑈			



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

April 1, 1993

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Mountain:

RE: Request for Amendment to Permit
Used Oil Utilization/Firing
Florida Crushed Stone Company

The Bureau of Air Regulation received your March 18, 1993, 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 a permit amendment; 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,

Patricia G. Adams

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/pa

P 062 921 982



Receipt for Certified Mail

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

PS Form 3800, June 1991

To: <i>Tom Mountain</i>	
Sent and to: <i>FL Crushed Stone</i>	
City, State, and 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, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>4-1-93</i>

our RETURN ADDRESS completed on the reverse side.

- 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 will show to whom the article was delivered and the date delivered.

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:
Tom Mountain, EM
Florida Crushed Stone
PO BOX 1508
Brooksville, FL 34605-1508

4a. Article Number
P 062 921 982

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

7. Date of Delivery
4-1-93

5. Signature (Addressee)
[Signature]

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

6. Signature (Agent)
[Signature]

Thank you for using Return Receipt Service.

MAIL ROOM ATTENTION ONLY

P.M.
3-19-93
Tampa, FL

File Copy



FLORIDA CRUSHED STONE COMPANY
CEMENT / POWER / LIME PLANT

March 18, 1993

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

RECEIVED

MAR 23 1993

Division of Air
Resources Management

Re: Used Oil Utilization/Firing

Mr. Mitchell,

As previously discussed, the FCS Cement Plant located in Hernando County, Florida is considering utilizing the used oil generated at the FCS Brooksville Operations for firing the kiln during start up operations. In response to Mr. Clair Fancy's letter dated January 26, 1993, the following information is provide for you review.

- * The used oil to be utilized would come from the used oil tanks located at the FCS Gregg Mine and the FCS CPL Plant mobile shops only. These sources contain a mixture of mobile, gearbox and bearing oils.
- * The used oil would be mixed with purchased fuel oil used to warm up the kiln in start up operations. The fuel oil tank is a 20,000 gallon tank, inventory is kept above 13,000 gallons at all time. Maximum total used oil generated for both sources combined averages at 30,000 gallons a year. Average fuel use in kiln warm up operations is 300,000 gallons a year. Monthly use of fuel oil varies between 17,000 gals to 32,000 gals. During warm up operations fuel oil firing rates range from 120 gph and gradually increase to 600 gph during the last two hours of a start up. The maximum rate of used oil fired during warm up operations would be between 10 to 15 percent.
- * The heating value of the used oil is roughly the same as for the purchased fuel oil; therefore, the percent of heat input of the used oil would equal the use rate percentage and would range from 10 to 15 percent.

Page 2.

- * As mentioned above, the only source that will fire/utilize the used oil is the kiln during start up operations.
- * Analyses of the used oil generated at both sources are included. According to the analyses, the used oil from both sources meets RCRA specifications for the fuel recovery of used oil according to 40 CFR 266.4.
- * The two sources mentioned will be the only used oil sources. No off-site generated used oil will be used.

Based on the information provided above, the FCS Cement Plant requests that FDER permits AC27-222095 and PSD-FL-091C be amended to authorize the continuous utilization/firing of on-site used oil in the facility's kiln at a maximum utilization/firing rate not to exceed 15% of the total Btu heat input derived from the use of fuel oil during start up operations. As a specific condition to guarantee compliance, the FCS Cement Plant would be required to record and maintain on file the amount of used oil and purchased fuel oil transferred to the Cement Plant fuel oil tank each month. FCS would be allowed to transfer used oil in amount equal to or less than 15% of the fuel oil purchased at the time in which the purchased fuel oil is delivered. This data would be reported on a quarterly basis in the fuel use and analysis data report currently submitted to the FDER Southwest District Office Air Section.

Please contact me at (904) 799-7881 ext. 205 should have any questions.

Sincerely,



Tom Mountain

Environmental Manager

Bill Thomas, SWD

Charles Hetrick/Kathy Liles, HCBCC } 3-30-93 RRM

CHF/JS/PL

Bruce Mitchell



Progress Environmental Laboratories

4420 Pendola Point Road
Tampa, Florida 33619
(813) 247-2805
FAX: (813) 248-1537

- CERTIFICATE OF ANALYSIS -
(HRS #E84207 and FDER CompQap #900306G)

To: Florida Crushed Stone
10311 Cement Plant Road
Brooksville, FL 34601

Report Date: 03/02/93

Attn: Butch Wheeler

PEL LAB # : 504236
Client ID : Motor Oil; Gregg Mine
Project ID :
Location : Gregg Mine
Matrix : Oil

Collection Information:
Sample Date: 02/09/93
Sample Time:
Sampled By : K.D.

ND = Less than MDL

***NOTE: EPA Method 602 analyzed on 02/26/93 by B.S.

Lab#	Parameter	Method	Results	Units	MDL
504236	Barium	EPA 6010	12.19	ug/g	0.96
	Cadmium	EPA 6010	0.70	ug/g	0.35
	Chromium	EPA 6010	1.23	ug/g	0.79
	Silver	EPA 6010	ND	ug/g	1.23
	Arsenic	EPA 7060	ND	ug/g	0.21
	Lead	EPA 7421	4.81	ug/g	0.07
	Mercury	EPA 7471	ND	ug/g	0.20
	Selenium	EPA 7740	0.24	ug/g	0.09
	Carbon	LECO CHN 600	77.02	Wt%	0.00
	Hydrogen	LECO CHN 600	12.91	Wt%	0.00
	Total Nitrogen	LECO CHN 600	0.20	Wt%	0.00

Respectfully submitted, Vincent M. Giampa
Vincent M. Giampa, Laboratory Supervisor



Progress Environmental Laboratories

4420 Pendola Point Road
Tampa, Florida 33619
(813) 247-2805
FAX: (813) 248-1537

- CERTIFICATE OF ANALYSIS -
(HRS #E84207 and FDER CompQap #900306G)

To: Florida Crushed Stone
10311 Cement Plant Road
Brooksville, FL 34601

Report Date: 03/02/93

Attn: Butch Wheeler

PEL LAB # : 504235
Client ID : Motor Oil; C.P.L.
Project ID :
Location : C.P.L.
Matrix : Oil

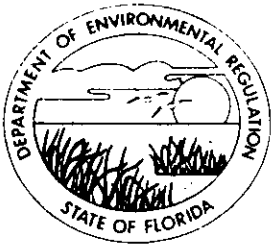
Collection Information:
Sample Date: 02/09/93
Sample Time:
Sampled By : K.D.

ND = Less than MDL

***NOTE: EPA Method 602 analyzed on 02/26/93 by B.S.

Lab#	Parameter	Method	Results	Units	MDL
504235	Barium	EPA 6010	ND	ug/g	0.77
	Cadmium	EPA 6010	ND	ug/g	0.28
	Chromium	EPA 6010	ND	ug/g	0.63
	Silver	EPA 6010	ND	ug/g	0.98
	Arsenic	EPA 7060	ND	ug/g	0.24
	Lead	EPA 7421	7.14	ug/g	0.08
	Mercury	EPA 7471	ND	ug/g	0.20
	Selenium	EPA 7740	0.12	ug/g	0.07
	Carbon	LECO CHN 600	84.47	Wt%	0.00
	Hydrogen	LECO CHN 600	13.31	Wt%	0.00
	Total Nitrogen	LECO CHN 600	0.10	Wt%	0.00

Respectfully submitted, Vincent M. Giampa
Vincent M. Giampa, Laboratory Supervisor



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 26, 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: Inquiry on the Utilization/Firing of Used Oil

On January 19, 1993, Mr. Tom Mountain spoke with Mr. Bruce Mitchell on the potential use of "used oil". Since the facility is not permitted to fire/utilize "used oil", then submit the following information to the Department's Bureau of Air Regulation and the permitting requirements will be established and you will be advised:

- o What is the source(s) of the "used oil"?
- o What is the maximum quantity of "used oil" that will be fired/utilized (i.e., gals/hr) on a per source basis?
- o On a per source basis, what is the "percent" of the heat input that will be supplemented by the "used oil"?
- o Identify the source or sources that will potentially fire/utilize the "used oil"?
- o Provide an elemental and ultimate analysis of the "used oil" that you plan on firing/utilizing.
- o Will there be any "used oil" generated off-site for this proposal? If so, please explain fully.

If there are any questions, please call Mr. Bruce Mitchell at (90)488-1344 or write to me at the above address.

Sincerely,


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

CHF/BM/rbm

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

P 062 921 961



Receipt for Certified Mail

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

PS Form 3800, June 1991

Sent <i>Randy Thompson</i>	
Street and <i>F1 Crushed Stone</i>	
P.O., State and ZIP Code <i>Leesburg, FL</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>1-28-93</i>

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

SENDER: Complete items 1, 2, 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 service(s) requested.

1. Show to whom, date and address of delivery.

2. Restricted Delivery.

3. Article Addressed to:
*Randy Thompson, Env. Dept
Fla. Crushed Stone
PO BOX 490300
Leesburg, FL 34749-0300*

4. Type of Service: <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured <input type="checkbox"/> COD	Article Number <i>062 921 961</i>
--	--	--------------------------------------

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature - Addressee
X

6. Signature - Agent
X Bill Westcott

7. Date of Delivery
2-1-93

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