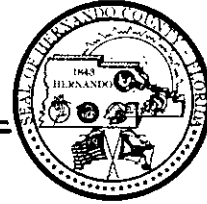


# Board of County Commissioners

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

April 28, 1995

RECEIVED

MAY 2 1995

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

Bureau of  
Air Regulation

RE: Florida Crushed Stone Company  
New Cement Kiln, Hernando County, PSD-FL-227

Dear Ms. Adams:

Hernando County staff have reviewed the above referenced PSD application. Our comments and questions are provided below.

1. The VOC pollutant emissions for the Unit I Kiln are 27.8 tpy and the power plant VOC emissions are 15.33 tpy. Alone these values are below the 40 tpy PSD significant emission rate, however cumulatively, they equal 43.36 tpy. Was a PSD review performed when the Unit I kiln and the power plant were initially constructed?
2. The application indicated that the Unit II kiln would utilize a mix of fuels, including gas. Will additional permitting be required should FCS begin utilizing natural gas as a fuel source?
3. Chemical equation (1) on page 4-17 does not balance for nitrogen.
4. The applicant used five years of meteorologic data from Tampa International Airport for the years 1982-1986. Is this the closest data point for the project site? Would more recent data be more representative of conditions at the site?
5. The applicant is utilizing ambient air data for the northern-Pinellas, southern-Pasco county area for PM<sub>10</sub>, NO<sub>x</sub>, CO, ozone and lead. Is this less restrictive for the applicant than using data from Hernando County, if data were available?
6. The maximum increase in facility impacts for the 3-hour and 24-hour SO<sub>2</sub> and annual NO<sub>x</sub> in the Class I area are greater than the SILs typically used by the national Park Service. However, they are below the draft SILs proposed by EPA. Which SILs will DEP use in reviewing the application? Has the National Park Service been notified of the proposed modification?

E:\WPDATA\KLG\DEPPERMT\NWKILN.DEP

Page Two  
April 28, 1995  
Ms. Patricia Adams

7. Since Hernando County adopted an Air Toxics and Hazardous Waste Fuel Burning Facility Moratorium, on May 15, 1990, there is concern regarding the use of on-specification used oil which may be presumed to be a hazardous waste. On-specification used oil is presumed to be a hazardous waste if total halogens exceed 1000 ppm. Further, used oil may be a characteristic hazardous waste if the flash point is less than 140° F. Therefore, Hernando County requests that any permit issued to FCS for the Unit II kiln include a specific condition which limits total halogens to 1000 ppm and sets the minimum flash point at 140° F, thereby removing any implication that the fuel may be a hazardous waste.
  
8. The FDEP guidance document on Burning Used Oil Containing Low Concentrations of PCBs (copy enclosed), dated March 31, 1994, stated that industrial furnaces, including cement kilns, can only burn used oil containing less than 50 ppm PCBs while operating at their normal temperatures. Also pursuant to the Guidance document, cement kilns cannot burn used oil containing PCBs above the detection limit of 2 ppm during startup or shutdown. **Based on the Guidance Document and on knowledge of previous air permits issued in Hernando County, we request a maximum allowable level of <2 ppm for PCBs for the on-specification used oil.**

I would appreciate a written response to these questions and comments so that we may include them in our files. Please note that these are initial comments and questions by staff, and do not reflect comments or questions that may be submitted at a later date following review by the Board of County Commissioners.

If you have any questions or would like to discuss this information, please contact Ms. Lizanne Garcia at (904)754-4057 (SunCom 669-4057).

Thank you for your cooperation in this matter.

Sincerely,



Lawrence Jennings,  
Department Director

KLJ:tag

Enclosure

Florida Department of  
Environmental Protection

Memorandum

DARM-PER/GEN-10

TO: John Ruddell, Director  
Division of Waste Management  
  
District Air Program Administrators  
County Air Program Administrators  
Bureau of Air Regulation Engineers

FROM: Howard L. Rhodes, Director *HLR*  
Division of Air Resources Management

DATE: March 31, 1994

SUBJECT: Guidance on Burning Used Oil  
Containing Low Concentrations of PCBs

The Department will use the 40 CFR 761 federal regulations on polychlorinated biphenyls (PCBs) as the basis for regulating the burning of "on-specification" used oil containing less than 50 ppm PCBs.

Used oil containing less than 50 ppm PCBs is an excluded product. Excluded PCBs products as applied to used oil means: oils which have a concentration of less than 50 ppm PCBs; were legally available before October 1, 1984; and have not been mixed with a material containing more than 50 ppm PCBs.

Used oil containing 50 ppm or more PCBs is not an excluded PCB product and is subject to the Toxic Substance Control Act (TSCA) regulations, 40 CFR 761. These regulations specify precisely how PCB contaminated material can be disposed of. EPA would be involved in approving the burning of used oil containing more than 50 ppm PCBs.

The following is a brief summary of the federal regulations (40 CFR 761) concerning burning of used or waste oil (products primarily derived from petroleum which include but are not limited to fuel oils, motor oils, gear oils, cutting oils, transmission fluids, hydraulic fluids, dielectric fluids, etc.) with low concentrations (less than 50 ppm) of PCBs for energy recovery.

40 CFR 761, Polychlorinated Biphenyls; Exclusions, Exemptions and Use Authorizations, includes requirements for the burning of used oil with low concentrations of PCBs (less than 50 ppm) for energy recovery. Some of the requirements, explained in the preamble of this federal rule that was published in the June 27, 1988, Federal Register, are:

1. For regulatory purposes used oil fuel is presumed to contain PCBs above the detection limit of 3 ppm. These regulations define detectable as meaning the practical limit of quantification. 40 CFR 761.30(e)-2.

2. The detection limit is defined as 2 ug/g from any resolvable gas chromatographic peak, i.e. 2 ppm. The American Society of Testing and Materials (ASTM) analytical methods for PCBs referenced in 40 CFR 761.60(a)(3)(iii)(B)(6) is ASTM D-808-81 for chlorine. (Note that some regulations list a lower PCB detection concentration with a different analytical method). (40 CFR 761.3)
3. A claim that used oil fuel does not contain quantifiable levels ( $\geq 2$  ppm) of PCBs must be documented by analysis or other information. The first person making the claim that the used oil does not contain PCBs is responsible for furnishing the documentation. The documentation can be tests, personal or special knowledge of the source and composition of the used oil, or a certification from the person generating the used oil claiming that the oil contains no detectable PCBs. (40 CFR 761.20(e)(2)(i))
4. Used oil containing less than 50 ppm PCBs is an excluded PCB product, but is subject to restrictions on use of PCB containing oil as a fuel. (40 CFR 761.3 (4) and 761.20(e))
5. Used oil containing less than 50 ppm PCBs may be burned in an industrial/electrical utility boiler or industrial furnace and other equipment as defined in 40 CFR 260.10 or referenced in Volumes I or II of PB-87-173-837, National Technology Information Service (NTIS), without a federal permit. (40 CFR 761.20(e)(3))
6. Used oil containing any detectable quantities of PCBs ( $\geq 2$  ppm) cannot be used as a sealant, coating, or dust control agent and cannot be burned in a non-industrial boiler or furnace (boilers in hotels, offices, laundries, service stations, greenhouses, colleges, hospitals, schools, prisons, etc.). (40 CFR 761.20(e))
7. RCRA approved boilers (industrial boilers and electric utilities) and industrial furnaces (cement kilns, phosphate kilns, aggregate kilns, blast furnaces, asphalt plants, phosphate rock dryers, etc.) are among the facilities that can burn used oil with less than 50 ppm PCBs for energy recovery. They can only burn used oil while operating at their normal temperature. They cannot burn used oil containing PCBs during startup or shutdown. (40 CFR 761.20(e)(3))

John Ruddell  
March 31, 1994  
Page Three

8. Automobile manufacturers may burn used oil containing PCBs that they generate in their own space heaters. Other space heaters are not allowed to burn used oil containing detectable quantities of PCBs ( $\geq 2$  ppm). (40 CFR 761.20(e)(1)(iii))
9. An eligible burner (person burning the used oil) must provide the marketer (person selling the used oil) with a one time written notice certifying that he will burn the used oil that is presumed to contain low concentrations of PCBs (2 to 50 ppm) in a qualified combustion device (40 CFR 279.61 and 40 CFR 260.10). The notice must state that EPA has been given a description of the used oil management activities and an industrial/electrical utility boiler or industrial furnace will be used to burn the oil. (40 CFR 761.20(e)(3))

Our only grounds at this time to limit the burning of used oil containing less than 50 ppm PCBs would need to be based on federal regulations or public health concern. The applicant will need to furnish the maximum PCBs content of the used oil that the source will burn for the Department to determine which regulations are applicable. Only industrial/electric utility boilers and industrial furnaces can burn used oil containing 2 to 50 ppm PCBs in Florida. EPA has concluded that the burning of used oil containing less than 50 ppm in an utility or industrial boiler and furnace is unlikely to cause unreasonable risk of injury to human health or the environment.

Based on this information, the Division of Air Resources Management has concluded that the burning of used oil with a PCB content of less than 50 ppm is allowed in a industrial/electric utility boiler or an industrial furnace by the federal regulations. "On-specification" used oil containing less than 2 ppm PCBs can be burned in any combustion device (industrial or nonindustrial) if authorized by a Department permit. The PCB content shall be determined using EPA, DEF, or ASTM approved methods.

For used oil containing 2 to 50 ppm PCBs, the Department's air permits must specifically state in a permit condition that used oil can be burned and if the used oil is "on-specification" or "off-specification". It should specify the maximum concentration of PCBs (<50 ppm unless otherwise specified by the applicant). It should also include the maximum quantity of used oil to be burned. The permit shall also require a copy of any applicable marketer's notice or EPA notification for the Department's files. No additional public notice shall be required for a source as described above to burn used oil containing up to 50 ppm PCBs.

HLR/CHF wr

TO: Buck Oven

THRU: Clair Fancy  
Al Linero

FROM: Teresa Heron  
Cleve Holladay

DATE: April 20, 1995

SUBJ: Florida Crushed Stone  
Incompleteness/Insufficiency Review  
File No. PSD-FL-227 and PA 82-17

The Bureau of Air Regulation has reviewed this application for incompleteness/insufficiency and has compiled the following comments. Please submit these comments to Florida Crushed Stone as part of the Department's incompleteness/insufficiency response.

**EMISSION DATA**

1. What are the contemporaneous emission changes of all criteria and noncriteria pollutants associated with this project? Please supply calculations for these changes that compare representative past actual emissions with the future potential emissions being requested for these pollutants. Include all assumptions, reference material and calculations.
2. How will fugitive and unconfined emissions from the different steps in the process be controlled? Quantify these emissions (identify the location).
3. Per the 1990 Clean Air Act Amendments (CAAA), EPA is to issue a Maximum Achievable Control Technology (MACT) standard by November 15, 1997, applicable to cement plants. Per Title III (Air Toxics) of the CAAA's 189 Hazardous Air Pollutants (HAPs) are now regulated air pollutants. Please provide the emission rates and ambient maximum 8 hour, 24 hour and average annual concentrations for HAPs emitted from cement manufacturing, including the tire burning scenario.
4. On February 7, 1995, EPA issued a regulatory determination on Cement Kiln Dust (CKD) which was required by RCRA Subtitle C. Accordingly, EPA will develop CKD regulations. Although the

Buck Oven  
April 20, 1995  
Page Two

present status of CKD will be maintained until such rules are written, we encourage the applicant to develop a multipathway health risk assessment to address the potential for indirect health and environmental effects from the kiln's emissions. EPA's Region VII Office (Kansas City, KA) is developing a generic workplan for cement kilns burning hazardous waste in their region. The workplan uses a tiering approach to expedite the process. We suggest you review the draft document (a copy is available from this office, if requested) developed by the EPA Region VII Office as a possible mechanism for developing a less time and resource intensive protocol for completing a risk assessment.

5. What additional assurance can you provide the Department that the operation of this facility will not be a threat to human health and welfare (such as by the fuels burned, etc.)?

6. Are there any emissions of VOC's from storage tanks associated with this project? If so, please quantify.

#### PROCESS EVALUATION

7. On the flow diagram and plot plan, show what process and control equipment is affected by this application. Show which baghouses, as described in your report, will be used (Table 3-2). Any changes? Any additions?

8. Submit design specifications of each baghouse that will be used. How was the flow (dscfm) calculated for each baghouse? Show any estimates used in this calculations.

9. What reasonable precautions will be used to minimize unconfined particulate matter emissions from the plant (quarries, haul roads, CKD handling equipment, dust disposal piles, manufacturing area, etc.).

10. Group each new emission point by unit category (raw material handling, raw mill system, kiln system, etc.). This approach will help in the writing of the permit conditions.

11. Describe procedures for startup and shutdown of the process equipment to insure minimization of excess emissions.

12. Provide a plan to establish good combustion practice to minimize NOx, CO and VOC emissions from the kiln. Ultimately, such a plan should be reflected in the plant operating procedures.

Buck Oven  
April 20, 1995  
Page Three

13. Provide a fuel analysis for the tire-derived-fuel (TDF) and for each grade of oil which is to be burned at the different combustion sources at this facility.

14. Specify the quantities of each fuel and the different mixtures of fuels that may be burned at each combustion source at this facility (consumption rate, percentage, etc.)

#### **BACT EVALUATION**

15. Explain the NOx controls proposed for each combustion source. Provide drawings and design details (text) for any low NOx burners, staged combustion, or other methods used to lower free O<sub>2</sub> available for NOx formation.

16. Explore the option of utilizing an electrostatic precipitator and discuss the benefits/problems of this approach compared to the baghouse. Include a discussion of SO<sub>2</sub> control and HAPs and any effects on start-up emissions of particulate matter and visible emissions. What is the actual SO<sub>2</sub> removal of the system?

17. Discuss feasibility of using cleaner fuels, such as natural gas or No. 2 fuel oil at 0.05% sulfur, to minimize SO<sub>2</sub> and NOx emissions. For reference, permitted NOx emissions are 3.14 lbs/ton of clinker at Florida Mining and Materials (2/93) and permitted SO<sub>2</sub> emissions are 0.31 lb/ton of clinker at Ash Grove Cement (6/90). Investigate any emerging technology for the control of NOx.

18. The BACT analysis must be expanded. BACT is done on a case-by-case basis and, at a minimum should include a technical, economic, and environmental analysis of any applicable control technology. Please refer to EPA New Source Review Workshop Manual.

#### **APPLICATION FORM**

19. Submit a signed copy of page 7 of DEP Form No. 62-210.900(1) with the professional engineer seal.

20. Complete questions 4 and 5 of page 22 of the application.

21. Complete pages 28, 30, 32, 34 of the application form No. 62-210.900(1). There are also few other blank fields throughout out the application that need to be completed.



Buck Oven  
April 20, 1995  
Page Four

22. The modification of this facility appears to be subject to New Source Performance Standards 40 CFR 60, Subpart Y Coal Preparation Plants and 40 CFR 60, Subpart OOO Nonmetallic Mineral Processing Plant. Please address all requirements in these regulations when preparing your response to this letter.

#### GENERAL

23. Will the proposed project comply with all of Hernando County's air pollution control regulations. Please see attached copy of the County regulation that may apply to your proposal. This ordinance was filed with the Secretary of State on May 17, 1990.

24. Please address the comments in the attached National Park Service correspondence. Also be advised that we are still waiting for comments from EPA. As soon as we receive their information, it will be forwarded to you.

#### AIR QUALITY ANALYSIS

25. Address any contemporaneous changes, if any, in emissions due to the proposed megawatt increase in the power plant and consider the impact of these changes in the air quality analysis. In addition, are there any contemporaneous changes in emissions from cement kiln I due to the proposed megawatt increase in the power plant? If there are, then these changes should also be considered in the air quality impact analysis.

26. Include particulate emissions from additional minor particulate source operations proposed to be constructed with cement kiln II (listed in Table 3-2 of the PSD report) in the PM<sub>10</sub> significant impact area modeling to determine whether further PM<sub>10</sub> modeling is necessary.

If you have any questions on this matter, please write to A. A. Linero or call Marty Costello, P.E. (BACT engineer), Cleve Holladay (meteorologist) or Teresa Heron (review engineer) at (904) 488-1344.

TH/CH/t

#### Attachments

cc: B. Thomas, SWD  
J. Harper, EPA  
J. Bunyak, NPS  
L. Roberts, P.E.



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1875 Century Boulevard  
Atlanta, Georgia 30345

APR 10 1995

IN REPLY REFER TO:

Mr. Clair H. Fancy  
Chief, Bureau of Air Regulation  
Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399

Dear Mr. Fancy:

We have reviewed the Prevention of Significant Deterioration (PSD) Application for the new cement kiln (kiln #2) proposed by Florida Crushed Stone (FCS) Company. The kiln would be located 20 km southeast of Chassahowitzka Wilderness Area (WA), a Class I air quality area, administered by the Fish and Wildlife Service (Service). The new kiln would emit significant amounts of PM-10, sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and carbon monoxide. FCS currently operates kiln #1 at the site.

We understand that another PSD application has been submitted for a modification to the power plant on the FCS property. This application was submitted by Central Power and Lime, formerly Florida Crushed Stone. Both Central Power and Lime and Florida Crushed Stone are under common ownership/control, and therefore emissions from both proposed projects should be considered together for PSD review.

### Air Quality Analysis

The air quality impact analysis for the proposed cement kiln is incomplete. The information in the permit application and the additional modeling analysis (March 21, 1995) is insufficient to determine whether emissions from the proposed new kiln (kiln #2) and other sources at the facility (kiln #1 and the power plant) would have a significant impact at Chassahowitzka WA. We understand that your office will be requiring additional modeling to be performed before the application is deemed complete. We request that FCS model Class I area impacts using revised facility emission rates specified by your office. Upon review of the revised modeling analysis, we will determine if a cumulative SO<sub>2</sub> Class I increment analysis is required. Also, if there is a change in the facility's NO<sub>x</sub> or PM-10 emission rates from the present analysis, those Class I impacts must also be recalculated. The March 21, 1995, analysis indicates that a cumulative nitrogen dioxide (NO<sub>2</sub>) Class I increment analysis is required because predicted NO<sub>2</sub> impacts exceed the Service Class I significant level of 0.025 micrograms per cubic meter.

The revised air quality impact analysis should also include annual impacts from lead (Pb), beryllium (Be), and mercury (Hg) emissions to the Class I area. The effects on resources from these pollutants should be addressed in the air quality related values analysis.

The VISCREEN analysis was incorrectly done. The emissions of sulfuric acid mist ( $H_2SO_4$ ) from the proposed kiln should be included in the analysis as primary sulfate ( $SO_4$ ). Also, the VISCREEN 2 analysis applied wind speed changes to the meteorological data that are inappropriate. The Environmental Protection Agency document on VISCREEN (Workbook for Plume Visual Impact Screening and Analysis, EPA-450/4-88-015, September 1988) does not indicate that compensation to wind speeds, using wind speed profile adjustments calculations, are to be applied. The revised VISCREEN analysis should not apply these wind speed profile changes. In addition, the analysis assumed a background visual range (BVR) of 25 km. The analysis should be done using a BVR of 65 km, the 90th percentile annual visual range for the wilderness area.

Due to the complex nature of this permit application, please require the applicant to submit, in addition to the written analysis, the modeling input and output files to us on a 3.5 floppy disk(s) for both the increment and visibility modeling analyses.

#### Best Available Control Technology

The Best Available Control Technology analysis appears to be complete.

#### Air Quality Related Values Analysis

No Class I Air Quality Related Values analysis was done, and thus, this part of the application is incomplete.

Thank you for giving us the opportunity to comment on this permit application. We appreciate your cooperation in notifying us of proposed projects with the potential to impact the air quality and related resources of our Class I air quality areas. If you have questions, please contact Ms. Ellen Porter of our Air Quality Branch in Denver at telephone number 303/969-2617.

Sincerely yours,

*Jeffrey S. Haskell*

Noreen K. Clough  
Regional Director

cc: J. Heron  
C. Halladay  
B. Owen  
J. Mountain, FCS  
G. Kissel, SW Dist  
G. Huppel, EPA  
Hunards Co (5-3345)

**AGENDA FOR APRIL 11, 1995 MEETING  
CONCERNING FLORIDA CRUSHED STONE PERMIT APPLICATION**

- I. STATUS OF AIR PERMIT
  - A. Modeling Review
  - B. Engineering Review
  - C. NPS/Class I Issues
  
- II. FORM OF AIR PERMIT
  
- III. PPSA PROCESS
  - A. Public Information/Outreach
  - B. Local Approvals
  - C. Hearing Requirements
  
- IV. SCHEDULE

**AGENDA FOR APRIL 11, 1995 MEETING  
CONCERNING FLORIDA CRUSHED STONE PERMIT APPLICATION**

**I. STATUS OF AIR PERMIT**

- A. Modeling Review
- B. Engineering Review
- C. NPS/Class I Issues

*Drapo emission rate  
50 → 45 → 25 lb/hr*

**II. FORM OF AIR PERMIT**

**III. PPSA PROCESS**

- A. Public Information/Outreach
- B. Local Approvals
- C. Hearing Requirements

**IV. SCHEDULE**

## #1a Crushed Stone

- Are the engines full oil & on specification used oil only used for start-up?
- Actual volumetric flow rate at different scenarios.

**Florida Department of Environmental Protection**

**Meeting Sign-In Sheet**

Re: FIA Crushed Stone

Date: \_\_\_\_\_

Name	Representing	Telephone
William Corbin	RTP Env Assoc.	908-968-9600
Larry Curtin	HAK	224-7000
Clare Holladay	DEP/BARM/BAR/NSRS	904-488-1344
Don Lacey	CORPORATE ENGINEERING ASSOC	904 796-9428
Tom Mountain	Florida Crushed Stone Co.	(904) 799-7881
Buck Owen	DEP - Siting	(904) 4870472
Donald F. Slias	RTP Environmental Assoc, Inc	(908) 968-9600
Al Linero	DEP / BAR - New Source Review	(904) 488-1344
Martin Costello	" "	" "
TERESA HERON	" " "	" "
Clair Rancy	" " "	" "



RTP ENVIRONMENTAL ASSOCIATES INC.

AIR • WATER • SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East • Green Brook, New Jersey 08812

(908) 968-9600

LETTER OF TRANSMITTAL

TO Mr. Cleve Holladay
Florida Dept. Environ. Protection
111 S. Magnolia, Suite 4
Tallahassee, FL 32301

Date: 03-22-95 Proj. ID: FCS

WE ARE SENDING YOU: [X] Attached [ ] Under separate cover
VIA: [ ] 1st Class Mail [X] Federal Express [ ] Hand Delivery [ ] Other
THE FOLLOWING ITEMS: a.m. Delivery

Table with 4 columns: Copies, Date, No., Description. Includes 'Modeling Outputs and Diskettes for Florida Crushed Stone Application' and a 'RECEIVED' stamp dated MAR 23 1995 from the Bureau of Air Regulation.

THESE ARE TRANSMITTED AS CHECKED BELOW:

- For approval, For review and comment, Resubmit \_\_\_ copies for approval, For your use, Copies returned after loan, For signature, As requested, Returned for corrections

REMARKS Please note that this information is being shipped to your office in two boxes.
The Fedex shipper numbers are 1276300340 and 1276300336. Should you not receive both these boxes in the a.m. delivery, please call Mary Jordan at (908) 968-9600.

COPY TO:

SIGNED: Mary P. Jordan

If enclosures are not as noted, kindly notify us at once.





RTP ENVIRONMENTAL ASSOCIATES INC.

AIR • WATER • SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East • Green Brook, New Jersey 08812

(908) 968-9600

LETTER OF TRANSMITTAL

TO Mr. Cleve Holladay
FDEP Two Tower Office Building
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

Date: 03-21-95 Proj. ID: ECS

RECEIVED

WE ARE SENDING YOU: [X] Attached [ ] Under separate cover

VIA: [ ] 1st Class Mail [X] Federal Express [ ] Hand Delivery [ ] Other

MAR 22 1995

THE FOLLOWING ITEMS:

Table with 4 columns: Copies, Date, No., Description. Includes entries for 'Letter from D. Elias RE: Florida Crushed Stone' and 'Copies of above letter for C. Fancy and T. Rogers'. Bureau of Air Regulation stamp.

THESE ARE TRANSMITTED AS CHECKED BELOW:

- For approval, For review and comment, Resubmit \_\_\_ copies for approval, For your use, Copies returned after loan, For signature, As requested, Returned for corrections

REMARKS

COPY TO:

Fed Exp # 10344617-1
RTP Env

SIGNED: Mary P. Jordan

If enclosures are not as noted, kindly notify us at once.



# RTP ENVIRONMENTAL ASSOCIATES INC.®

AIR • WATER • SOLID WASTE CONSULTANTS

239 U.S. Highway 22 East  
Green Brook, New Jersey 08812-1909

(908) 968-9600  
Fax: (908) 968-9603

March 21, 1995

Mr. Cleve Holladay  
Florida Department of Environmental Protection  
Twin Tower Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED

MAR 22 1995

Bureau of  
Air Regulation

Dear Mr. Holladay:

Last week an air permit application was submitted for a second cement kiln at the Florida Crushed Stone facility in Brooksville, Florida. Modeling analyses were performed for two facility configurations for which the second cement kiln would increase facility impacts:

- (1) Case 1 - increases in facility impacts due to the proposed kiln when the existing kiln only is operating; and
- (2) Case 2 - increases in facility impacts due to the proposed kiln when the existing kiln and power plant are operating.

As shown on Table 6-8 of the permit application (copy attached), maximum increases in facility Class I SO<sub>2</sub> and NO<sub>x</sub> impacts are greater than the National Park Service (NPS) significant impact levels (SILs) but less than the USEPA draft Class I SILs proposed by the New Source Review Reform Committee last summer. It should be noted that for Case 2, two cement kilns operating with the power plant, is the facility configuration most likely to occur the majority of the time. For this operating scenario, no increases in facility Class I impacts greater than the NPS SILs were predicted. Case 1, two cement kilns operating without the power plant, is unlikely to occur for a significant portion of the year but was analyzed in the permit application since it is a plausible source configuration.

For Case 1, the number of receptor-periods and the number of periods with impacts greater than the NPS SILs (based on the "traditional" set of 13 receptors for the Chassahowitzka NWA) were as follows:

	--No. of Receptor-Periods-- ---greater than NPS SILs---		-----No. of Periods----- ---greater than NPS SILs---	
	<u>24-Hour SO<sub>2</sub></u>	<u>3-Hour SO<sub>2</sub></u>	<u>24-Hour SO<sub>2</sub></u>	<u>3-Hour SO<sub>2</sub></u>
1982	56	3	28	3
1983	35	0	18	0
1984	46	1	32	1
1985	44	2	24	2
1986	37	1	21	1

- 2 -

These impacts, the periods of occurrences, and the Class I receptor locations are attached on Tables 1 through 5 for Tampa meteorological data from 1982 through 1986, respectively.

Additionally, the permit application only gives increases in facility Class I impacts and does not provide facility impacts. As you have requested, we have attached on Tables 6 and 7 the maximum facility Class I impacts for both Cases 1 and 2. Table 6 shows the maximum impacts by year for each year of meteorological data for a unitized facility emission rate of 1 gram/second. Table 7 shows the maximum overall Class I facility impacts for all criteria pollutants. These impacts are compared on Table 7 to the maximum increases in facility impacts given on Table 6-8 of the air permit application. As can be seen on Table 7, the magnitude of facility impacts is comparable to the increases in facility impacts given earlier. Both are very small when compared to the Class I increments, primarily due to the tall GEP stack height.

Finally, it is our understanding that at least three previous applications have performed additional analyses demonstrating compliance within the Class I areas. Additionally, several of the major utility sources impacting Chassahowitzka are reducing SO<sub>2</sub> emissions. Due to the GEP stack at FCS, our impacts, even under worst-case conditions are minor. This opinion is confirmed by the consensus Class I significance levels released by the New Source Review Reform Committee. Any additional modeling would only add unnecessary delays.

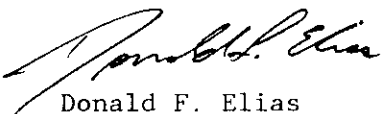
Based on the above facts, we feel that no further modeling should be required. Please confirm this determination.

We are sending you separately two boxes containing the 3.5" diskettes and printed outputs of the modeling runs.

We would be happy to meet with you and/or the Park Service, either telephonically or in person, to discuss the results should you feel it would be helpful. If you require any additional information or have any questions concerning these analyses, please feel free to contact either William E. Corbin or myself at the above telephone number.

Sincerely,

RTP ENVIRONMENTAL ASSOCIATES, INC.



Donald F. Elias  
Principal

DFE/WEC/wec

cc: T.Mountain/L.Curtin, FCS  
C.Fancy/T.Rogers, FDEP  
M.Hober/W.Corbin/FCS Project File, RTP

*G. Kissel, SW Dept*  
*G. Naylor, EPA*  
*G. L... OAS*  
*C. K... Alameda Co*

TABLE 1  
1982 INCREASES IN CLASS I IMPACTS GREATER THAN NPS SILs  
FOR TWO OPERATING KILNS

24-HOUR			24-HOUR		
PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X, Y(m) (TOP 50)	PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X, Y(m) (TOP 50)
82010724	0.06955	-18000, 11500 (53)	82122424	0.11295	-16300, 15800 ( 3)
82013024	0.07244	-19700, 7300 (42)	"	0.09118	-17000, 13700 (15)
82021424	0.08604	-19700, 3200 (24)	"	0.08781	-17600, 18100 (19)
82030624	0.09031	-18900, 20900 (17)	"	0.08690	-21000, 20900 (20)
82040224	0.07174	-18000, 11500 (43)	"	0.08618	-23500, 20900 (23)
82041624	0.06917	-28500, 20900 (55)	82122524	0.10595	-19700, 3200 ( 6)
82042524	0.07086	-17000, 13700 (48)	"	0.07947	-18000, 11500 (30)
82050724	0.07901	-19700, 5200 (31)	"	0.07353	-19700, 5200 (39)
82051324	0.09198	-19700, 3200 (14)	82122624	0.07817	-19700, 5200 (32)
"	0.07065	-19700, 7300 (49)	82122724	0.08409	-18000, 11500 (26)
82051724	0.11085	-19700, 3200 ( 4)	"	0.07090	-17000, 13700 (47)
"	0.08658	-19700, 5200 (21)			
82052424	0.07703	-18000, 11500 (34)			
82060324	0.07736	-18000, 11500 (33)			
"	0.07632	-19700, 5200 (36)			
"	0.06955	-17000, 13700 (54)			
82060424	0.10391	-17000, 13700 ( 7)			
"	0.10120	-16300, 15800 (10)			
"	0.09350	-17600, 18100 (12)			
"	0.08630	-21000, 20900 (22)			
"	0.07097	-18900, 20900 (46)			
"	0.07034	-23500, 20900 (50)			
"	0.07006	-26000, 20900 (52)			
82060724	0.08102	-19700, 3200 (28)			
82073124	0.07023	-18000, 11500 (51)			
82090124	0.09082	-19700, 3200 (16)			
"	0.07394	-19700, 5200 (38)			
82101224	0.10122	-19700, 5200 ( 9)			
"	0.08947	-19700, 3200 (18)			
82110124	0.07981	-19700, 3200 (29)			
82111224	0.10334	-17000, 13700 ( 8)			
"	0.07621	-26000, 20900 (37)			
"	0.07137	-28500, 20900 (45)			
82112724	0.08298	-19700, 5200 (27)			
82120124	0.07305	-19300, 9400 (41)			
82120224	0.11507	-19700, 7300 ( 2)			
"	0.09406	-19300, 9400 (11)			
"	0.08527	-19700, 5200 (25)			
82120324	0.15604	-18000, 11500 ( 1)			
"	0.10930	-19300, 9400 ( 5)			
"	0.07343	-19700, 7300 (40)			
82120424	0.09221	-17000, 13700 (13)			
"	0.07682	-18000, 11500 (35)			
"	0.07147	-26000, 20900 (44)			
"	0.06890	-28500, 20900 (56)			

3-HOUR		
PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X, Y(m) (TOP 50)
82051709	0.52051	-19700, 3200 (2)
82060709	0.49960	-19700, 3200 (3)
82111209	0.54321	-17000, 13700 (1)

**TABLE 2**  
 1983 INCREASES IN CLASS I IMPACTS GREATER THAN NPS SILs  
 FOR TWO OPERATING KILNS

PERIOD (YYMMDDHH)	24-HOUR CONC	LOCATION (RANK)
	( $\mu\text{g}/\text{m}^3$ )	X,Y(m) (TOP 50)
83012024	0.11516	-19300, 9400 ( 5)
"	0.09955	-19700, 7300 ( 8)
83022024	0.08963	-19700, 5200 (14)
"	0.07689	-19700, 3200 (29)
83022724	0.12978	-19700, 5200 ( 2)
"	0.09633	-19700, 3200 (11)
83030524	0.16871	-17000,13700 ( 1)
"	0.12025	-26000,20900 ( 4)
"	0.09869	-23500,20900 ( 9)
"	0.08379	-28500,20900 (19)
"	0.08209	-16300,15800 (24)
83041424	0.10479	-16300,15800 ( 7)
"	0.09505	-21000,20900 (12)
"	0.09274	-17600,18100 (13)
83042824	0.07077	-23500,20900 (32)
83050724	0.09857	-17000,13700 (10)
"	0.08677	-18000,11500 (16)
"	0.08181	-19300, 9400 (26)
"	0.07899	-23500,20900 (28)
83051024	0.12422	-19300, 9400 ( 3)
"	0.07427	-17000,13700 (30)
83051324	0.07046	-19300, 9400 (33)
83051824	0.08611	-19700, 5200 (17)
"	0.08314	-19700, 3200 (20)
83061724	0.07094	-19700, 5200 (31)
83062024	0.08261	-19700, 7300 (22)
"	0.06862	-18000,11500 (35)
83073024	0.10627	-19700, 3200 ( 6)
83082624	0.08275	-18000,11500 (21)
83091824	0.08148	-19700, 3200 (27)
83102324	0.08743	-21000,20900 (15)
"	0.08247	-17600,18100 (23)
"	0.08202	-16300,15800 (25)
83112024	0.08493	-18900,20900 (18)
83122724	0.07014	-19300, 9400 (34)

TABLE 3  
1984 INCREASES IN CLASS I IMPACTS GREATER THAN NPS SILs  
FOR TWO OPERATING KILNS

24-HOUR			3-HOUR		
PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X,Y(m) (TOP 50)	PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X,Y(m) (TOP 50)
84011024	0.07283	-18000,11500 (35)	84081309	0.50744	-18000,11500 (1)
84012324	0.07122	-19700, 3200 (40)			
84012624	0.06882	-18000,11500 (44)			
84021024	0.08356	-19700, 5200 (19)			
84021124	0.08768	-19700, 3200 (13)			
"	0.08235	-19700, 5200 (20)			
84021224	0.10498	-19700, 5200 ( 4)			
"	0.09147	-19700, 3200 ( 9)			
84022124	0.08745	-19700, 5200 (14)			
84022624	0.11657	-16300,15800 ( 1)			
"	0.08619	-17600,18100 (16)			
"	0.08418	-21000,20900 (18)			
"	0.08026	-23500,20900 (24)			
"	0.07429	-17000,13700 (32)			
84030524	0.08687	-17600,18100 (15)			
"	0.08430	-18900,20900 (17)			
"	0.07901	-16300,15800 (27)			
"	0.07022	-21000,20900 (43)			
84031224	0.10121	-19700, 3200 ( 6)			
84050124	0.07092	-19300, 9400 (42)			
84050724	0.07095	-18900,20900 (41)			
84052224	0.09400	-18000,11500 ( 8)			
84052424	0.09136	-18000,11500 (10)			
84052824	0.06846	-19300, 9400 (45)			
84060724	0.08231	-19700, 3200 (21)			
84060824	0.07227	-19700, 3200 (38)			
84060924	0.11139	-19700, 3200 ( 2)			
84061624	0.10255	-19700, 3200 ( 5)			
84061724	0.08058	-19700, 5200 (23)			
"	0.07405	-19700, 3200 (33)			
84070524	0.07978	-18000,11500 (25)			
84072124	0.08156	-19700, 3200 (22)			
84072324	0.07161	-19700, 5200 (39)			
84072824	0.07724	-17000,13700 (28)			
84072924	0.07263	-19300, 9400 (37)			
84081324	0.07617	-18000,11500 (29)			
84082324	0.07603	-19700, 3200 (30)			
84102024	0.07307	-17000,13700 (34)			
84102824	0.10646	-18000,11500 ( 3)			
84112724	0.09626	-17000,13700 ( 7)			
"	0.07445	-28500,20900 (31)			
"	0.07265	-18000,11500 (36)			
"	0.06834	-26000,20900 (46)			
84122824	0.07901	-19700, 5200 (26)			
84123124	0.08883	-16300,15800 (11)			
"	0.08770	-23500,20900 (12)			

TABLE 4  
1985 INCREASES IN CLASS I IMPACTS GREATER THAN NPS SILs  
FOR TWO OPERATING KILNS

24-HOUR			3-HOUR		
PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X,Y(m) (TOP 50)	PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X,Y(m) (TOP 50)
85010124	0.09213	-18000,11500 (12)	85050209	0.55397	-16300,15800 (1)
85021024	0.07073	-19700, 5200 (32)	85083003	0.49419	-17000,13700 (2)
85022124	0.07348	-19700, 5200 (27)			
85022224	0.07597	-19700, 3200 (25)			
85032124	0.07035	-17000,13700 (35)			
85041124	0.10690	-19700, 3200 ( 5)			
"	0.09070	-19700, 5200 (13)			
85041324	0.09956	-19700, 5200 ( 6)			
85041824	0.09390	-19700, 3200 (10)			
85050224	0.08927	-16300,15800 (15)			
"	0.07498	-21000,20900 (26)			
"	0.07274	-17600,18100 (28)			
85060624	0.07020	-28500,20900 (38)			
85061524	0.07865	-16300,15800 (24)			
"	0.07126	-21000,20900 (31)			
"	0.07044	-17600,18100 (34)			
85072024	0.10862	-18000,11500 ( 4)			
"	0.07051	-28500,20900 (33)			
85072224	0.08985	-19700, 5200 (14)			
"	0.08095	-19700, 3200 (19)			
85072624	0.07910	-19700, 3200 (22)			
85072724	0.08902	-19300, 9400 (16)			
85073024	0.06919	-18000,11500 (40)			
85083024	0.19581	-17000,13700 ( 1)			
"	0.14318	-26000,20900 ( 2)			
"	0.11800	-28500,20900 ( 3)			
"	0.09814	-23500,20900 ( 7)			
"	0.09225	-16300,15800 (11)			
"	0.07924	-17600,18100 (21)			
"	0.07022	-21000,20900 (37)			
85090224	0.09722	-19300, 9400 ( 8)			
"	0.06875	-19700, 7300 (43)			
85102724	0.07905	-16300,15800 (23)			
"	0.07271	-17000,13700 (29)			
"	0.06890	-23500,20900 (42)			
85102824	0.09638	-17000,13700 ( 9)			
"	0.06869	-26000,20900 (44)			
85111624	0.08443	-19700, 5200 (18)			
85112024	0.07226	-19700, 5200 (30)			
"	0.06961	-19700, 7300 (39)			
85112524	0.07950	-19700, 3200 (20)			
85112824	0.08615	-16300,15800 (17)			
"	0.07033	-21000,20900 (36)			
"	0.06902	-17600,18100 (41)			

**TABLE 5**  
 1986 INCREASES IN CLASS I IMPACTS GREATER THAN NPS SILs  
 FOR TWO OPERATING KILNS

24-HOUR			3-HOUR		
PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X,Y(m) (TOP 50)	PERIOD (YYMMDDHH)	CONC ( $\mu\text{g}/\text{m}^3$ )	LOCATION (RANK) X,Y(m) (TOP 50)
86031024	0.10019	-17000,13700 ( 5)	86061509	0.53123	-19700, 3200 (1)
"	0.07738	-26000,20900 (20)			
86031324	0.12081	-17000,13700 ( 1)			
"	0.09087	-16300,15800 ( 6)			
"	0.08765	-17600,18100 ( 8)			
"	0.08198	-18900,20900 (12)			
"	0.07998	-26000,20900 (16)			
"	0.07203	-21000,20900 (32)			
"	0.07026	-23500,20900 (35)			
86031824	0.10409	-17000,13700 ( 4)			
"	0.08636	-16300,15800 ( 9)			
"	0.08278	-23500,20900 (10)			
"	0.07686	-19700, 5200 (23)			
"	0.07168	-26000,20900 (33)			
86040524	0.07501	-19700, 3200 (24)			
86052524	0.07800	-18000,11500 (18)			
86052724	0.06863	-19300, 9400 (36)			
86052824	0.07349	-18000,11500 (27)			
86060324	0.08118	-19700, 5200 (14)			
86061324	0.07712	-19700, 5200 (21)			
86061424	0.08268	-17000,13700 (11)			
"	0.07432	-28500,20900 (26)			
"	0.07309	-18000,11500 (28)			
86061524	0.07688	-19700, 3200 (22)			
86070524	0.10590	-19300, 9400 ( 3)			
86070924	0.07209	-18000,11500 (30)			
86080824	0.07458	-17000,13700 (25)			
86081024	0.08142	-18000,11500 (13)			
86081224	0.08955	-19300, 9400 ( 7)			
86092524	0.06805	-19700, 7300 (37)			
86110724	0.08026	-19700, 3200 (15)			
86112424	0.10648	-17000,13700 ( 2)			
"	0.07987	-26000,20900 (17)			
86112524	0.07796	-17000,13700 (19)			
"	0.07206	-16300,15800 (31)			
"	0.07125	-23500,20900 (34)			
86120924	0.07248	-19300, 9400 (29)			



TABLE 6  
MAXIMUM CLASS I FACILITY IMPACTS<sup>a</sup>

Year/ Avg. Time	Case 1 - 2 Cement Kilns		Case 2 - 2 Cement Kilns + Power Plant	
	Conc.	X,Y Coord(m)	Conc.	X,Y Coord(m)
82/Annual	<u>0.00281</u>	-19700, 3200	<u>0.00150</u>	-19700, 3200
1-hr MAX	<u>0.23413</u>	-19700, 5200	0.11304	-16300,15800
H2H	0.18709	-16300,15800	0.09989	-16300,15800
3-hr MAX	0.10762	-19700, 3200	0.05911	-19700, 5200
H2H	0.09399	-19700, 3200	0.05169	-17000,13700
8-hr MAX	0.05888	-18000,11500	0.03568	-18000,11500
H2H	0.05166	-19700, 5200	0.02670	-18000,11500
24-hr MAX	0.03357	-18000,11500	0.01881	-18000,11500
H2H	0.02330	-19700, 3200	0.01451	-16300,15800
83/Annual	0.00248	-18000,11500	0.00140	-18000,11500
1-hr MAX	0.20765	-18000,11500	0.11773	-19700, 3200
H2H	0.19031	-19700, 5200	0.10506	-19700, 3200
3-hr MAX	<u>0.11958</u>	-19700, 7300	<u>0.06603</u>	-19700, 3200
H2H	0.07716	-17000,13700	<u>0.06054</u>	-18000,11500
8-hr MAX	0.07336	-16300,15800	0.03544	-21000,20900
H2H	<u>0.06343</u>	-16300,15800	<u>0.03387</u>	-16300,15800
24-hr MAX	0.03670	-17000,13700	0.02258	-17000,13700
H2H	<u>0.02593</u>	-16300,15800	0.01526	-19300, 9400
84/Annual	0.00270	-19700, 3200	0.00146	-19700, 3200
1-hr MAX	0.21376	-19700, 5200	0.12348	-19700, 3200
H2H	0.18554	-19700, 5200	0.11072	-19700, 3200
3-hr MAX	0.11882	-18000,11500	0.05892	-16300,15800
H2H	0.09357	-19700, 5200	0.05676	-19700, 5200
8-hr MAX	<u>0.08044</u>	-19700, 3200	0.03517	-16300,15800
H2H	0.05364	-19700, 3200	0.03115	-19700, 3200
24-hr MAX	0.02985	-19700, 5200	0.01681	-19700, 3200
H2H	0.02448	-19700, 3200	0.01563	-19700, 3200
85/Annual	0.00229	-19700, 3200	0.00126	-19700, 3200
1-hr MAX	0.21910	-19700, 3200	0.11628	-19700, 7300
H2H	<u>0.20452</u>	-17000,13700	<u>0.11387</u>	-19700, 7300
3-hr MAX	0.11204	-17000,13700	0.06208	-17000,13700
H2H	0.09329	-17000,13700	0.05058	-17000,13700
8-hr MAX	0.06786	-17000,13700	<u>0.03789</u>	-19700, 5200
H2H	0.05328	-17000,13700	0.03145	-17000,13700
24-hr MAX	<u>0.04389</u>	-17000,13700	<u>0.02481</u>	-17000,13700
H2H	0.02164	-18000,11500	0.01327	-17000,13700
86/Annual	0.00260	-18000,11500	0.00145	-17000,13700
1-hr MAX	0.19969	-19700, 5200	<u>0.12465</u>	-18000,11500
H2H	0.18416	-19700, 3200	0.10718	-18000,11500
3-hr MAX	0.10964	-19700, 3200	0.05952	-18900,20900
H2H	<u>0.09665</u>	-18000,11500	0.05355	-17000,13700
8-hr MAX	0.05026	-19700, 7300	0.03341	-17000,13700
H2H	0.05014	-19700, 7300	0.02973	-17000,13700
24-hr MAX	0.02530	-17000,13700	0.01740	-17000,13700
H2H	0.02390	-17000,13700	<u>0.01631</u>	-17000,13700

<sup>a</sup>Facility class I impacts in ug/m<sup>3</sup> for a facility emission rate of 1 gram/second. Maximum and maximum second-highest impacts are underlined. X,Y coordinates are in meters east and north of the facility stack.

**TABLE 7**  
**MAXIMUM FACILITY CLASS I IMPACTS AND**  
**MAXIMUM INCREASES IN FACILITY CLASS I IMPACTS<sup>a</sup>**

Pollutant/ <u>Avg. Time</u>	Case 1 - 2 Cement Kilns		Case 2 - 2 Cement Kilns + Power Plant		
	<u>Maximum</u> <u>Impacts</u>	<u>Maximum</u> <u>Increases</u>	<u>Maximum</u> <u>Impacts</u>	<u>Maximum</u> <u>Increases</u>	
SO <sub>2</sub>	3-hr MAX	1.431	0.554	6.872	0.372
	3-hr H2H	1.157	0.500	6.301	0.341
	24-hr MAX	0.525	0.196	2.582	0.064
	24-hr H2H	0.310	0.115	1.697	0.053
	Annual MAX	0.034	0.011	0.156	< 0.0
NO <sub>2</sub>	Annual MAX	0.254	0.091	0.296	0.040
PM	24-hr MAX	0.547	0.221	0.425	0.119
	24-hr H2H	0.323	0.130	0.280	0.085
	Annual MAX	0.035	0.013	0.026	0.007

<sup>a</sup>Impacts given in ug/m<sup>3</sup>.

**TABLE 6-8**  
**MAXIMUM INCREASES IN FACILITY IMPACTS DUE TO PROPOSED MODIFICATION<sup>a</sup>**  
**COMPARED TO SIGNIFICANT IMPACT LEVELS**

\*\*\*\*\* CLASS II MAXIMUM INCREASES \*\*\*\*\*

Pollutant/ Avg. Time	-----Facility Configuration-----		Class II SILs	Maximum Percent of SILs	
	(CP1 + CP2) -(CP1)	(PP + CP1 + CP2) -(PP + CP1)			
SO <sub>2</sub>	3-hour	2.393	1.193	25	9.6%
	24-hour	0.590	0.178	5	11.8%
	Annual	0.040	0.003	1	4.0%
NO <sub>2</sub>	Annual	0.341	0.128	1	34.1%
PM <sub>10</sub> /TSP	24-hour	0.633	0.328	5	12.7%
	Annual	0.047	0.024	1	4.7%
CO	1-hour	14.467	8.260	2000	0.7%
	8-hour	3.829	1.460	500	0.8%

\*\* CLASS I MAXIMUM INCREASES COMPARED TO NPS SIGNIFICANT IMPACT LEVELS \*\*

Pollutant/ Avg. Time	----- Facility Configuration-----		National Park Service Class I SILs	Maximum Percent of SILs	
	(CP1 + CP2) -(CP1)	(PP + CP1 + CP2) -(PP + CP1)			
SO <sub>2</sub>	3-hour	0.554	0.372	0.48	115.4%
	24-hour	0.196	0.064	0.068	288.2%
	Annual	0.011	< 0.0	0.025	44.0%
NO <sub>2</sub>	Annual	0.091	0.040	0.025	364.0%
PM <sub>10</sub>	24-hour	0.221	0.119	0.27	81.8%
	Annual	0.013	0.007	0.080	16.3%
TSP	24-hour	0.221	0.119	0.33	67.0%
	Annual	0.013	0.007	0.083	15.7%

\*\* CLASS I MAXIMUM INCREASES COMPARED TO EPA SIGNIFICANT IMPACT LEVELS \*\*

Pollutant/ Avg. Time	-----Facility Configuration-----		USEPA Draft Proposed Class I SILs	Maximum Percent of SILs	
	(CP1 + CP2) -(CP1)	(PP + CP1 + CP2) -(PP + CP1)			
SO <sub>2</sub>	3-hour	0.554	0.372	1.0	55.4%
	24-hour	0.196	0.064	0.2	98.0%
	Annual	0.011	< 0.0	0.1	11.0%
NO <sub>2</sub>	Annual	0.091	0.040	0.1	91.0%
PM <sub>10</sub>	24-hour	0.221	0.119	0.3	73.7%
	Annual	0.013	0.007	0.2	6.5%
TSP	24-hour	0.221	0.119	0.4	55.3%
	Annual	0.013	0.007	0.2	6.5%

<sup>a</sup>Impacts and significant impact levels (SILs) shown in ug/m<sup>3</sup>. Impacts are maximum short-term and long-term increases in facility impacts due to proposed modification.

Law Offices

# HOLLAND & KNIGHT

A Partnership Including Professional Corporations

315 South Calhoun Street  
Suite 600  
P.O. Drawer 810 (ZIP 32302-0810)  
Tallahassee, Florida 32301

904-224-7000  
FAX 904-224-8832

March 20, 1995

Atlanta	Orlando
Fort Lauderdale	St. Petersburg
Jacksonville	Tampa
Lakeland	Washington, D.C.
Miami	West Palm Beach

LAWRENCE N. CURTIN  
904-425-5678

## VIA HAND DELIVERY

Mr. Hamilton S. Oven, Jr., P.E.  
Office of Siting Coordination  
Department of Environmental Protection  
Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Suite 953A  
Tallahassee, Florida 32399-3000

# RECEIVED

MAR 22 1995

Bureau of  
Air Regulation

Re: Central Power & Lime, Inc. -- Conditions of  
Certification; PA 82-17

Dear Buck:

As you know, last week an Application was filed with the Department for authorization to construct a second cement plant at the site of the existing CPL cogeneration facility in Hernando County, Florida. The permit application was submitted to the Bureau of Air Quality Management for processing, in accordance with our earlier meetings with you, Clair Fancy and others. The Application is for a 600,000 ton per year cement plant. A copy of the Application is enclosed for your files.

We have reviewed the Conditions of Certification for the cogeneration facility, and have discussed the matter with you and with Clair Fancy at various meetings. Since the construction will be at the site of a certified cogeneration facility, you will be involved in the review. With respect to the air emissions, we have not identified any specific Conditions of Certification that will require modification. However, some language may be required to reflect the additional facility. Additionally, the enclosed Application materials and subsequent submittals should be considered as an update to the Site Certification Application.

We have identified changes to the water balance at the facility as a result of this proposal and other activities. I have enclosed for your review, and appropriate distribution, a report from Imperial Testing Laboratories that details these modifications. A revised Water Use Plan is included. In summary, the construction and operation of the proposed new kiln is not expected to have any impact on water supply. The net effect of all of the changes is a reduction in the currently approved groundwater

Mr. Hamilton S. Oven, Jr., P.E.  
March 20, 1995  
Page 2

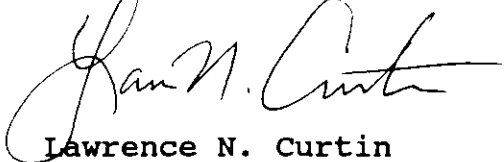
withdrawal requirements. This reduction is approximately 1.2 million gallons per day. In connection with the authorization of construction of the additional cement plant, the Conditions of Certification should be modified to reflect this reduction.

We understand there is no need to submit an additional modification fee at this time since a substantial portion of a previously submitted modification fee remains at the Department. We will keep you advised of the progress and will plan to schedule a meeting with you at the appropriate time to discuss any questions you may have or additional information you may require.

Please do not hesitate to contact us to discuss the matter.

Sincerely,

HOLLAND & KNIGHT



Lawrence N. Curtin

Attachments

cc w/o enc:

Mr. Clair Fancy  
Mr. Tom Mountain

LNC/mrh  
TAL-59833



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 14, 1995

Mr. Charles B. Hetrick  
County Administrator  
Hernando County Government Center  
20 N. Main Street, Room 461  
Brooksville, FL 34601

RE: Florida Crushed Stone Company  
New Cement Kiln  
Hernando County, PSD-FL-227

Dear Mr. Hetrick:

Enclosed for your review and comment is the above referenced PSD application. Please forward your comments to the Department's Bureau of Air Regulation as soon as possible. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Teresa Heron or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

*for* *Patricia G. Adams*  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

Enclosures

cc: Teresa Heron  
Cleve Holladay



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 14, 1995

Ms. Jewell A. Harper, Chief  
Air Enforcement Branch  
U.S. EPA, Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30308

RE: Florida Crushed Stone Company  
New Cement Kiln  
Hernando County, PSD-FL-227

Dear Ms. Harper:

Enclosed for your review and comment is the above referenced PSD application. Please forward your comments to the Department's Bureau of Air Regulation as soon as possible. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Teresa Heron or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

*Patricia G. Adams*

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

CHF/pa

Enclosures

cc: Teresa Heron  
Cleve Holladay



# Department of Environmental Protection

Lawton Chiles  
Governor

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

Virginia B. Wetherell  
Secretary

March 14, 1995

Mr. John Bunyak, Chief  
Policy, Planning and Permit Review Branch  
National Park Service-Air Quality Division  
P. O. Box 25287  
Denver, Colorado 80225

RE: Florida Crushed Stone Company  
New Cement Kiln  
Hernando County, PSD-FL-227

Dear Mr. Bunyak:

Enclosed for your review and comment is the above referenced PSD application. Please forward your comments to the Department's Bureau of Air Regulation as soon as possible. The Bureau's FAX number is (904)922-6979.

If you have any questions, please contact Teresa Heron or Cleve Holladay at (904)488-1344 or write to me at the above address.

Sincerely,

*Patricia G. Adams*  
C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/pa

Enclosures

cc: Teresa Heron  
Cleve Holladay



Law Offices

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March 13, 1995

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**LAWRENCE N. CURTIN**  
904-425-5678

Mr. Clair Fancy  
Department of Environmental  
Protection  
111 South Magnolia, Suite 4  
Tallahassee, Florida

RECEIVED

MAR 13 1995

Bureau of  
Air Regulation

Re: Florida Crushed Stone Company -- Application to  
Construct a Second 600,000 Ton Per Year Cement Kiln  
at the Florida Crushed Stone Company Facility In  
Brooksville, Florida

Dear Clair:

Enclosed for processing are the original and 6 copies  
of Florida Crushed Stone Company's Application to construct a  
second 600,000 ton per year cement kiln at the site of the  
cogeneration facility located in Brooksville, Florida. In  
accordance with our earlier meetings with you and Buck Oven, we  
understand that a separate processing fee is not required for this  
Application, and that any charges will be deducted from the fee  
already paid for our currently pending Modification to the  
Conditions of Certification for the cogeneration facility.

We will be in contact with Buck Oven this week to discuss any  
related matters concerning the Conditions of Certification. We  
will coordinate any changes with both of you.

If you have any questions or require additional information,  
please contact me or Tom Mountain at (904) 799-7881.

Sincerely,

Holland & Knight

*Lawrence N. Curtin (LNC)*

Lawrence N. Curtin

cc: Mr. Tom Mountain

LNC/mrh  
TAL-59812

*J. Cron*  
*C. Holladay*  
*A. Kissel*  
*C. Metrick*  
*G. Harper*  
*G. Bunyak*