


TO: A. Linero & Scott Sheplak

FROM: J. Kissel 

DATE: September 10, 1997

SUBJECT: Attached letter re Fla. Crushed Stone/Central P&L

The attached letter requests an amendment "either in the existing permits or in the Title V permits".

I'd like to treat this as a supplement to the Title V application to be addressed in the Title V permit, but since this facility is under PPS, I wanted to run this by you, Al, in case you think Tall'e should take any permitting action on this request. Until the Title V permit is issued, we at the SWD could just give them an authorization letter for the next test cycle.

We'll proceed as above unless I hear differently from either of you.

(Scott: There's been some prior conversations and e-mails on whether Florida Crushed Stone (0530021), Central Power and Lime (0530032), and Chemical Lime (0530005) should be considered as one facility, and who should process the Title V permit. Since Central Power and Lime is permitted under Power Plant Siting, it seems that it should be a Tall'e Title V project, but it would not have to meet the Acid Rain deadline and could be done next year.)

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SEP 17 1997

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KA 307-97-07

September 2, 1997

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Department of Environmental Protection  
SOUTHWEST DISTRICT

BY \_\_\_\_\_

Mr. David Zell  
Florida Department of  
Environmental Protection  
Southwest District Office  
3804 Coconut Palm Drive  
Tampa, Florida 33619-8318

Subject: Florida Crushed Stone Company/  
Central Power & Lime  
Hernando County  
Permits A027-231888A and AC27-222095 - Cement Plant  
PA82-17D - Power Plant  
Permit PSD-FL-090B - Project

Dear Mr. Zell:

On behalf of Florida Crushed Stone Company (FCS) and Central Power & Lime (CPL), I would like to clarify by permit amendment the compliance testing requirements for the FCS cement plant and the CPL power plant. As you are aware, the cement kiln, clinker cooler, raw mill, and limestone dryer associated with the cement plant and the CPL power plant all discharge through a common baghouse and stack. The permits for the facility specify emission limiting standards for the cement plant while operating alone, the power plant while operating alone, and for the cement plant and power plant when operating together. By far, the most common operating scenario is for the cement plant and power plant to operate together.

The current cement plant operating permit (A027-231888A at Specific Condition 19) requires compliance testing on an annual basis (within 60 days prior to May 1) when only the cement plant sources are operating (the kiln, cooler, raw mill and limestone dryer). The permits are less specific regarding compliance testing requirements for the power plant and for the power plant and cement plant operating together.

Historically, FCS/CPL has conducted annual compliance testing for the regulated air pollutants (particulate matter, sulfur dioxide, nitrogen oxides and opacity) with the cement plant and power plant operating together. Difficulties have arisen in scheduling annual compliance testing with only the cement plant operating because of the reliability factor associated with the power plant. The fact is the power plant has a scheduled six-week outage only every two years for maintenance. With this schedule, it is impossible to conduct compliance testing with the

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Florida Department of  
Environmental Protection

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cement plant sources only operating every year. This matter has been discussed with the Department in the past and the Department has been understanding of operational conditions at FCS/CPL and has either waived or delayed compliance testing of the cement plant sources only (see attached FDEP letter dated April 5, 1995).

Regarding compliance testing when the power plant only is operating, FCS/CPL has had an informal understanding with the Department that if emissions measured with the cement plant and power plant operating together were less than, or "near", the limits permitted for the power plant operating alone, the presumption would be that the power plant operating alone was in compliance. This understanding has never been committed to writing and no specific limits have been established to evaluate how this understanding would be implemented if emissions measured during joint operations fell outside of "near" as referenced in the verbal understanding.

The flexibility the Department has granted in past compliance testing is within the jurisdiction of the Department. Rule 62-297.310(7)(a)(4), F.A.C. states:

During each federal fiscal year (October 1-September 30), unless otherwise specified by rule, order or permit, the owner or operator of each emission unit shall have a formal compliance test conducted for:

- a. Visible emissions, ...
- b. Each of the following pollutants, if there is an applicable standard, and if the emission unit emits or has the potential to emit; ... 100 tons per year or more of any other regulated air pollutant; and
- c. Each NESHAP pollutant, ....

[Emphasis added]

Rather than continuing to address the necessity of waivers on a case-by-case basis and consistent with the request in the Department's April 5, 1995, letter, we are requesting that the compliance testing requirements of the cement plant and power plant be amended either in the existing permits or in the Title V operation permits which will be issued in the not too distant future.

