



4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

KA 307-04-04
April 7, 2005

Via Email and USPS

RECEIVED

APR 12 2005

BUREAU OF AIR REGULATION

Trina Vielhauer
Florida Dept. of Environmental Protection
Twin Towers Office Bldg
2600 Blair Stone Road
Tallahassee, FL 32399-2400

**RE: *Rinker/Florida Crushed Stone
Brooksville Cement Plant
Kiln No. 1
Request for a Minor Air Construction Permit Amendment to Address
Dioxin/Furan Related Matters***

Dear Trina:

This is a follow up confirmation to my handwritten memo to you of April 6, 2005 addressing the above captioned matter. This letter will confirm that the Rinker Materials Corporation (Rinker) will agree to a minor air construction permit amendment for the company's existing Brooksville cement plant (the No. 1 Kiln System) to incorporate a permit condition that will restrict the cement plant operations in a manner that will assure compliance with the D/F emission limits of the National Emissions Standards for Hazardous Pollutants (NESHAP) for Portland cement plants (40 CFR 63, Subpart LLL), and corresponding air permit conditions.

Specifically, Rinker agrees to accept a permit condition that complies with the following:

For Kiln No. 1 to operate during periods of time when the co-located CPL power plant is not operating and during times the power plant is starting up, the No. 1 Raw Mill shall operate at all times, except that periods of raw mill downtime, not to exceed ten consecutive hours, are authorized.

For purposes of this condition, power plant start up is defined as the period beginning with the initiation of firing either fuel oil or coal following periods of power plant down time and continuing for 72 consecutive hours.

The raw mill operating limits specified herein do not apply during the start up of the cement plant.

The conditions herein may be amended if Rinker provides the Department with other assurances, acceptable to the Department, that the permitted dioxin/furan emission limits will be complied with during the above described conditions.


Trina Vielhauer
April 7, 2005

3

We appreciate the effort that you and your staff have expended on this matter. If there are questions or comments regarding this agreement or if the suggested permit condition is substantially altered, please contact me at 352-377-5822 or jkoogler@kooglerassociates.com.

Very truly yours,

KOOGLER & ASSOCIATES, INC.



John B. Koogler, Ph.D., P.E.
Florida Professional Engineer
Registration No. 12925

JBK/lt

cc: Greg DeAngelo, FDEP
Jim Pennington, FDEP
Bobby Bull, FDEP
Charles Allen, Rinker
Scott Benyon, Rinker
Mike Vardeman, Rinker
Segundo Fernandez, OHFC
David Dee, Landers & Parsons
Don Elias, RTP Environmental Associates





RTP ENVIRONMENTAL ASSOCIATES INC.®

AIR · WATER · SOLID WASTE CONSULTANTS

3115 Northington Court Suite 141

Florence, Alabama 35630

(www.rtpenv.com)

Phone: (256) 740-5522

Fax: (256) 740-5530

e-mail: bandrews@rtpenv.com

June 29, 2005

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JUN 30 2005

BUREAU OF AIR REGULATION

James K. Pennington, P.E.
Administrator, North Permitting Section
Division of Air Resource Management
Department of Environmental Protection
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

**Re: Comments on Draft Permit and BACT Determination
DEP File No. 0530021-009-AC (PSD-FL-351)
Proposed New Kiln (Cement Plant #2) at the Florida Crushed Stone
Brooksville Facility
Hernando County, Florida**

Dear Jim:

Enclosed are four original signed and sealed copies of the letter which provides responses to the draft permit for the proposed new kiln (Cement Plant #2) at the Florida Crushed Stone Brooksville Facility. I understand from talking to Don Elias that four is the number of originals that FDEP needs to continue with processing the permit application.

RTP and Florida Crushed Stone appreciate the expedited attention that has been given to processing this permit application. If you require additional information or have questions please contact Charles Allen at (352) 799-7881 or Don Elias at (732) 968-9600.

Sincerely,

Barry D. Andrews, P.E.



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June 29, 2005

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Administrator, North Permitting Section
Division of Air Resource Management
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JUN 30 2005

BUREAU OF AIR REGULATION

Re: Comments on Draft Permit and BACT Determination
DEP File No. 0530021-009-AC (PSD-FL-351)
Proposed New Kiln (Cement Plant #2) at the Florida Crushed Stone Brooksville Facility
Hernando County, Florida

Dear Mr. Pennington:

Florida Crushed Stone Company (FCS) has reviewed the Department's draft PSD permit and supporting documentation for FCS's proposed cement plant in Brooksville, Florida. This letter contains FCS's comments concerning the draft permit, as well as a couple of comments on the Department's Best Available Control Technology Determination. FCS's comments are ordered by page number from the draft permit and also reference the section or permit condition. Underlining indicates any requested changes to language.

DRAFT PSD PERMIT

1. Page 2, Facility Description, Paragraph 2

The production and processing limits listed at the end of this paragraph should be noted as informational and not as limits, except for the clinker production. The clinker production rate can be checked by an inspector and thus affords the necessary practical enforceability. The other values increase the complexity of the permit without adding additional assurances of compliance with the emission standards. However, if the Department believes the production levels (not limits) should be added for informational purposes, the correct values are as follows:

Line 2 will have a capacity of 214.9 tons per hour of material fed (dry basis) to the preheater, 125 tons per hour of clinker production, and 240 tons per hour of cement production (30 day average).

Daily and annual rates are 1,756,380 tons per year (4,812 tons/day) of material fed to the preheater (dry basis), 1,022,000 tons per year (2,800 tons/day) of clinker production, and 1,301,138 tons per year (5,760 tons/day) of cement production.

The plant will also include a coal processing operation that will crush coal and petroleum coke and will have an annual processing capacity of 165,000 tons of coal and petroleum coke. The new raw material and handling storage shall not process more than 276 tons per hour of raw material (2,417,760 tons per year) in any consecutive 12-month period.

2. Page 3, Section I, Regulatory Classification, Paragraph 4

It should be stated that the facility is assumed to be a major source of hazardous air pollutants, because the facility is assumed to be a major source of hydrochloric acid (HCl). It should be noted that test data is not available to confirm this assumption. Recent data for similar facilities indicate that Portland cement plants may not be a major source of HCl.

3. Page 6, Section II, Condition 8

It is requested that the first sentence of the condition be changed to read:

“The permittee shall submit an application to the Department when there is any modification to this facility that would require a permit under State or Federal regulations.”

4. Page 7, Section II, Condition 11.b

Because of the large geographical buffer zone between the material storage area and the property boundary, the fugitive emissions from these sources will not significantly affect ambient air quality. In fact, the current ambient PM10 monitoring program has demonstrated that air quality is safely below the standards, and that the current material handling practices are adequate. Therefore, FCS requests that the first bullet in this condition be revised to:

“FCS will utilize material handling precautions similar to those currently used for Kiln 1”.

5. Page 11, Section III, Condition 2

Regarding Condition 2a, the use of SNCR to control NOx emissions will give FCS the option of operating the kiln with oxidizing conditions at the back end of the kiln (the end of the kiln where the gases exit and the end of the kiln into which whole tire derived fuel will be introduced). The oxidizing condition will likely allow FCS to use more whole tire derived fuel, and FCS requests an upper limit on the heat input provided by whole tire derived fuel of 40 percent.

Regarding condition 2b, it is requested that the sentence “Flyash shall not exceed 15.0 tons/hr.” be deleted. The feed rate will depend on the quality (e.g., Btu value) of the ash and may change. If the Department believes that this condition must be included, the value should be revised to 25 tons/hr.

6. Page 11, Section III, Condition 3

“Used oil” and “oil fuels” should be deleted to be consistent with Specific Condition 2, which allows on-spec oil and distillate oil to be used as fuel.

7. Page 11, Section III, Condition 4

As noted in Comment 1, FCS believes that these production limits are duplicative and unnecessary for compliance purposes. The clinker production rate affords practical enforceability, while the additional limitations will not provide additional assurance that the facility is complying with its emission limits. If the Department still believes that these Process Rate Limitations are needed, the correct values are presented in Comment 1.

8. Page 12, Section III, Condition 4

The formula for Clinker Production should read:

Clinker Production = [(Preheater Feed)(Kiln Feed LOI Factor plus kiln feed loss from preheater) + (Fly Ash Injection)(Fly Ash LOI Factor)]

9. Page 12, Section III, Condition 9

To be consistent with page 8 of the *Best Available Control Technology Determination* prepared by the Department, the first sentence should read:

“The owner or operator shall install selective noncatalytic reduction (SNCR) and multistage combustion (MSC) or equivalent system as needed to supplement the controls.”

10. Page 12, Section III, Condition 9

It is requested that the fifth sentence of the condition be changed to read:

“The owner or operator shall use hydrated lime injection or other control techniques when necessary to achieve the SO₂ emission limits.”

11. Page 13, Section III, Condition 11

It is requested that the first two sentences in Specific Condition 11 be changed to read:

Performance Testing: The owner or operator shall notify the Department at least 60 days prior to initiating a change in feed or fuel that may adversely affect compliance with D/F or PM emission limiting standards, or as soon as practical where 60 days advance notice is not feasible. For purposes of this condition, such change may include a physical or chemical change in feed or fuel or a change in the LOI of the flyash.

This proposed language is consistent with the language of 40 CFR 60.1349(e)(3)(i). In the proposed language, a change in a “supplier of feed or fuel” has been eliminated because a supplier can be changed without affecting the physical or chemical characteristics of feed or fuel, or adversely affecting compliance with D/F or PM limiting standards.

12. Page 13, Section III, Condition 12

As requested and discussed in the permit application, the CO and VOC emission limits should be 4.0 and 0.19 lb/ton clinker, respectively, and the averaging period for SO₂ and CO should be a 30-day average. The averaging time for the CO limit should match the VOC and NO_x limits, because these pollutants are interrelated in their formation and control. The SO₂ limit should be 30 days, as is typical for most combustion sources that utilize coal as a fuel.

FCS is proposing an aggressive NO_x limit, based on the use of innovative combustion and emissions control systems. Efforts to reduce NO_x emissions through combustion controls such as MSC and the application of SNCR typically result in higher CO and VOC emissions. There is very little data to show that the Department's proposed CO and VOC limits are consistently achievable with the proposed control systems under all operational conditions. Less than a month of data is available from the tests of SNCR at Suwanee American and Florida Rock. There are no data available to show whether emissions will increase over time or when the facility is operating under a wider range of conditions. A two year study period is proposed to allow for a variety of operating conditions to be verified by actual plant operation. Consequently, FCS believes there are inadequate data to support the limits for CO and VOC that have been proposed by the Department. Significantly, as noted on Page BD-19, the 0.12 lb/ton limit for VOC in the Draft permit is "...approximately equal to the 0.11 lb/ton limit proposed as LAER for the St Lawrence Cement project in New York." The Rinker project is subject to BACT, not LAER.

FCS suggests footnotes similar to that for NO_x, which proposes lower rates after a period of initial operation. It is requested that the footnotes for the table be changed for CO and VOC as follows:

² CO emissions shall not exceed 4.0 lb/ton of clinker and 466.7 lb/hr (30-day block average) during the first two years of operation after initial startup. Commencing two years after initial plant startup, emissions of CO shall not exceed the limits shown in the table if these limits are shown to be achievable by actual plant performance.

³ VOC emissions shall be expressed as propane. VOC emissions shall not exceed 0.19 lb/ton of clinker and 22.17 lb/hr (30-day block average) during the first two years of operation after initial startup. Commencing two years after initial plant startup, emissions of VOC shall not exceed the limits shown in the table if these limits are shown to be achievable by actual plant performance.

Finally, please include the following clarifying language. In the first sentence of the second paragraph, please revised "Emissions from this unit shall not exceed the following limits for the following pollutants" to "Emissions from this unit shall not exceed the following limits for the following pollutants, excluding periods of startup, shutdown and malfunction as defined in Condition 14 below".

13. Page 13, Section III, Condition 12

In the table, the basis for the mercury limit is not BACT.

14. Page 14, Section III, Condition 12

In the paragraph below the table, the annual emissions presented by the Department do not represent the facility's total potential to emit because they do not include startup and shutdown emissions. Consequently, the annual emissions presented in this paragraph should be considered informational only, not emission limits.

In the same paragraph, the parenthetical statement after NO_x should read "(after 180 days)."

15. Page 14, Section III, Condition 13

In the application, the discussion of malfunctions is based on 7 hours per "event" Therefore, in the third sentence of this Condition; each event should be 7 hours per calendar day, instead of 6 hours.

16. Page 14, Section III, Condition 14

FCS is proposing a new Condition 14 to address startup, shutdown and malfunctions as follows (the addition of this Condition will require the permit Conditions following it to be renumbered; however, in the draft permit there is no Condition 20, therefore only permit Conditions 14-19 in Section III need to be renumbered). The ambient air quality analyses presented in the Application considered higher emissions for these periods (as listed below), and demonstrated compliance with all ambient standards. These additional operating conditions should be specified as allowable in the permit.

<u>POLLUTANT</u>	<u>POTENTIAL EMISSIONS</u>
<u>SO₂</u>	<u>57.5 lb/hour</u>
<u>NO_x</u>	<u>1000 lb/hour</u>
<u>CO</u>	<u>1000 lb/hour</u>
<u>VOC</u>	<u>71.3 lb/hour</u>

Periods of Startup, Shutdown and Malfunction: The owner or operator shall not cause, permit, or allow the total operating time during periods of startup, shutdown, and malfunction to exceed 336 hours per year on a rolling 365-day total. Within one working day of a malfunction, the permittee shall notify the Department's Southwest District.

17. Page 14, Section III, Condition 15

As mentioned in our comment #11, the averaging period for SO₂ and CO is requested to be a 30-day average.

18. Page 15, Section III, Condition 19

It is requested that the following be added after the table:

“If all of the secondary fuels listed above are not available at the time of testing, the tests shall be based on the fuels that are available. If another secondary fuel becomes available in the future, additional tests shall be conducted with that fuel, if such tests are deemed necessary by the Department, before that fuel is used.”

19. Page 16, Section III, Condition 24, First Paragraph

It is requested that the second sentence read as follows:

“The owner or operator shall maintain records of the quantity and representative analysis of fuels purchased, and such records shall include the sulfur content and heat content of the fuel. For coal, natural gas, fuel oil, and propane, the records also shall include the proximate and ultimate analyses.”

20. Page 19, Section III, Subsection B, Condition 2, Paragraph 2

The first sentence should read:

“Initial and annual compliance testing for PM and PM10 emissions from these emission units...”

21. Page 20, Section III, Subsection C, Condition 2

The emissions from the coal handling and grinding operations are limited by the baghouse grain loading and baghouse flow rates, and do not depend upon the process rate throughput. Therefore, FCS requests that these process rate limits be deleted, as there are other enforceable limits on these units. However, if the Department believes that this condition must be included, the limits should be revised to 20 tons/hr and 165,000 tons per year.

BACT DETERMINATION

22. Page BD-3, Last Sentence

The dioxin emissions stated in the Department’s BACT determination (0.00105 pounds per year) are based on units with a baghouse inlet temperature >204 C. As noted in the application, FCS’s proposed inlet temperature will be < 204 C and the emissions are limited to 0.00236 pounds per year in accordance with the NESHAP requirements in 40 CFR 63.1343.

23. Page BD-8, Particulate Matter (PM and PM₁₀)
Refer to comment number 4.

Thank you for your review and consideration of FCS's comments. Please do not hesitate to contact Charles Allen at (352) 799-7881 or me at (732) 968-9600 if you require further information.

Sincerely,

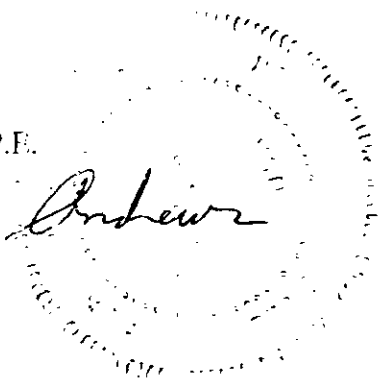
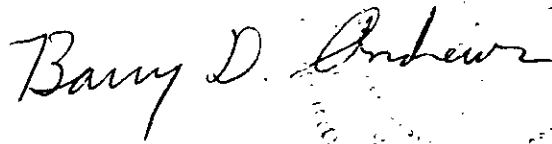


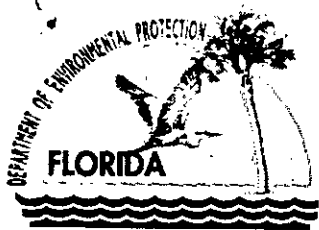
Donald F. Elias / BDA
Principal

Cc: C. Allen
S. Benyon
M. Vardeman
D. Dee
M. Podrez
pf RMBR

SEAL

Barry D. Andrews, P.E.





Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

January 19, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Charles Allen
Rinker Materials of Florida, Inc.
13011 Cement Plant Road
Brooksville, FL 34601

Re: Request for Additional Information
DEP File No. 0530021-009-AC (PSD-FL-351)
Proposed New Kiln (Cement Plant #2) at the Florida Crushed Stone Brooksville Facility in Hernando County, Florida

Dear Mr. Allen:

On December 20, 2004, we received from RTP Environmental Associates, Inc. your application for an air construction permit for a new kiln at the Brooksville cement plant located at 13011 Cement Plant Road, Brooksville, Hernando County. Also, on December 20, we received the correct PSD permit processing fee.

Pursuant to Rule 62-4.055, F.A.C., Permit Processing, the Department requests submittal of additional information prior to processing the application. For responses to any of the items below that require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Provide manufacturer's certification that will confirm the maximum design capacity of the kiln in tons per hour of dry feed and in tons per hour of clinker produced. Provide a similar certification for heat input for the kiln and precalciner burners. Rule 62-4.070, F.A.C.
2. Provide details on the kiln burner and describe where air and fuel will be introduced and how they are staged to minimize NO_x formation. Please indicate the type of burner that will be used. Explain why the flue gas needs reheating for use with an SCR system.
Rules 62-212.400 and 62-4.070(1), F.A.C.
3. Describe the manner in which the precalciner vessel(s) will operate at the facility.
Rules 62-212.400 and 62-4.070(1), F.A.C.
4. Please provide information on CO and VOC control options, and details of both why CO and VOC will require a higher emission limit than has currently been permitted. 62-4.070(1), F.A.C.
5. Please provide information justifying a proposed limit of 0.2lb/ton for both PM and PM₁₀.
62-4.070(1), F.A.C.
6. Please assess the use of "high-efficiency bag filter, outfitted with teflon-coated fiberglass bags" and/or HEPA filters as secondary controls of particulate matter from the kiln system. What percentage, if any, of the collected fines will be recycled into the process? Rule 62-212.400, F.A.C.

"More Protection, Less Process"

Printed on recycled paper.

7. Submit a projected chemical analysis of the raw materials and additives likely to be used at this plant. Provide a proximate and ultimate analysis of the fuels proposed. Rule 62-4.070(1), F.A.C
8. Please indicate if you intend to add any storage tanks meeting the applicability requirements under 40 CFR 60, Subpart Kb. Rule 62-4.070(1), F.A.C.
9. Describe the primary fuel firing scenarios and describe the ratio of heat input at various fuel mixtures. Detail why heat input ratios might change under normal operating conditions and emissions. Provide an estimate of pollutant emissions under each scenario. Define the combustion practices that will be used to control CO and VOC. Rule 62-4.070(1), F.A.C.
10. Part D [Segment (Process/Fuel) Information] of Section 1 in the application indicates only three segments. However in Section 4.0 of the BACT Determination, other fuels are listed as fuels for the kiln and pre-calciner. Provide a list all fuels the facility intends to use for the kiln, pre-calciner and all other emissions units. Explain in what combinations or maximum amounts/percentages these fuels will be used. Explain how the different fuel types/combinations may affect emission rates, operation of control equipment (fabric filter (PM/PM10) and SNCR (NOx)) and affect control of combustion in the kiln (as Good Combustion Practice is the proposed BACT technology for CO and VOC, and Multistage Combustion is a component of the BACT for NOx). Rule 62-4.070(1), F.A.C.
11. Please explain the SO₂ emissions limit of 0.23 lb/hr. Provide information on the increase of SO₂ by co-firing different fuels with the coal in the kiln, and how this will effect your BACT determination for SO₂. Consider the possibility of hydrated lime injection for added SO₂ control when the raw mill is off, or raw material with higher sulfur is encountered, or if excess SO₂ from burning high sulfur fuel causes a break through in the calciner. Rule 62-4.070(1), F.A.C.
12. Provide the volume and residence time of material in the calciner with the production rate of 125 tons per hour for the new kiln. Rule 62-4.070(1), F.A.C.
13. For NO_x, SO₂, and CO, please justify the significantly higher emission rates for startup, shutdown, and non routine activities. Rule 62-4.070(1), F.A.C.
14. Estimate the impact of mercury deposition in the vicinity of this facility. Please provide reasonable assurance that the 26 lb/year of mercury emissions will not be exceeded. Also, provide reasonable assurance that the lead PSD significance levels will not be exceeded. Advise of any methods that will be undertaken to minimize mercury emissions such as raw material selection or transferring some baghouse dust straight to product. Rule 62-4.070(1), F.A.C.
15. Part D [Segment (Process/Fuel) Information] of Section 1 in the application indicates the kiln will have a maximum of 6 startups lasting 12 hours per year. However, throughout the application and in the BACT Determination, startup/shutdown and non routine emissions estimates vary based on 4 events each month lasting 7 hours for a total of 28 hours a month. Please explain the discrepancy. Explain the NO_x, SO₂, and CO calculations used for startup, shutdown and non routine emissions. The application states 750 hours for these periods, but the calculations are based on the 28 hours a month (336 hours/year). Explain the discrepancy. How many startup and shutdown events will normally occur each year? Describe the nature and duration of emissions, particularly from the in-line kiln/raw mill and clinker cooler, during startup and shutdown. Describe procedures used to minimize excess emissions during these events. Rules 62-4.070(1) and 62-210.700, F.A.C.
16. Provide additional BACT incremental control and economic analysis for controlling SO₂, PM, and CO. Explain cost savings and analysis between different types of controls and the level of each of the controls for these pollutants. Rule 62-4.070, F.A.C.

17. Please provide manufacturer, model numbers and design specifications for the fabric filters, ESPs, continuous monitoring systems used for these systems. Rules 62-4.070 and 62-212.400, F.A.C.
18. Does Florida Crushed Stone or its parent company have any current violations of Department regulations at any of their facilities? Please provide all documentation in relation to these violations. Rule 62-4.070(5), F.A.C.
19. Rule 62-212.400(5)(h) 5, F.A.C. requires the applicant to provide information relating to the air quality impact of, and the nature and extent of, all general commercial, residential, industrial and other growth which has occurred since August 7, 1977, in the area the facility or modification would affect. Please provide this information. The additional impacts section 7.0 does not adequately address this requirement.
20. Please update the application with the detailed building structure information used in the modeling to determine downwash impacts. This information should include building dimensions for all buildings used in the modeling analyses. In addition, please provide the detailed facility layout to scale of the facility showing the exact location of the modeling origin in meters and the location from this modeling origin of each building and stack. All stacks and buildings should be labeled. In addition, a grid with 100 meter spacing should be overlaid over this plot plan so that the information on the plot plan can be easily correlated with the information in the BPIP files. Additionally fence lines or physical barriers which preclude access to non-ambient air should be shown. Non-ambient air is the atmosphere over land owned or controlled by the source and to which public access is precluded by a fence or other physical barrier
21. The worst case operational scenarios should be used in the impact modeling. Emissions rates based on a 30 day average limit are not appropriate for evaluating the impacts on short-term standards and increments. Please provide short-term modeling based on the worst case 3 and 24 hour emission rates expected.
22. The United States Fish and Wildlife Service (FWS) has established a concern threshold for nitrogen deposition in the Chassahowitzka Class I area and requires an evaluation of this deposition. Please provide this evaluation.
23. The emission sources used for both the NAAQS and PSD compliance modeling were selected based on the 20D rule. This rule does not consider the additive effects of a number of sources located in the same general location. Review of the 20D rule eliminated sources reveals a few PM₁₀ sources that may need to be included in the impact modeling emission inventories. In addition, the application of the 20D rule starts at the edge of the significant impact area (5 km in this case) instead of at the center of the facility. This means that all sources within the significant impact area should be modeled. Please provide a detailed table showing how the 20 D rule was applied to the cumulative PM inventory submitted with this application.
24. The preferred ambient background concentrations for the NAAQS compliance demonstration should be the maximum annual concentration measured at a representative monitoring location. An average of the highest concentrations over several years is not appropriate for this assessment.
25. Please provide a detailed list of the parameters used in the fugitive PM₁₀ modeling. Please provide the value and supporting information for the silt loading factor used to estimate the paved road emissions inputs in this modeling. The details of the PM₁₀ point, area and volume sources associated with the facility, including existing sources, along with associated stack parameters should be provided. In addition, have all quantifiable fugitive emissions, other than paved road emissions been

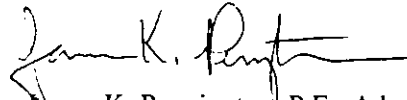
included in the PM₁₀ modeling analysis? Also provide information on the precautions to prevent emissions of unconfined particulate matter.

26. The kiln stack temperature used in the air quality modeling is 560.9 degrees K, which is at least 100 degrees K hotter than the projected temperatures for similar kilns in the area, including the existing kiln at Florida Crushed Stone. Please explain.

Since the application is not complete, an *incomplete application* has been provided to the Federal Land Manager in accordance with Rule 62-212.400(4)(a)2., F.A.C. Federal Land Manager Participation. The FLM is responsible for demonstrating to the Department whether emissions from the facility will have an adverse impact on the air quality-related values (AQRVs including visibility) of the Federal Class I Area. The Department must consider such a demonstration in its Preliminary Determination if it is received within 30 days after the Department sends a complete application to the FLM.

We will forward any comments received from other agencies as soon as we receive them. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call Bobby Bull at 850-921-9585. Matters regarding modeling issues should be directed to Cleve Holladay at 850/921-8986.

Sincerely,



James K. Pennington, P.E., Administrator
North Permitting Section

JKP/rlb

Eddie Allsopp, III, Rinker Materials of Florida, Inc.
Barry D. Andrews, P.E., RTP Environmental Associates, Inc.
Jerry Kissell, Florida DEP- SWD
David Zell, Florida DEP- SWD
John Bunyak, NPS
Jim Little, EPA



RTP ENVIRONMENTAL ASSOCIATES, INC. ®

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LETTER OF TRANSMITTAL

239 US Highway 22 East (732) 968-9600 Voice
Green Brook, NJ 08812 (732) 968-9603 Fax

RECEIVED

JAN 18 2005

BUREAU OF AIR REGULATION

To: James Pennington
Florida Department of
Environmental Protection
111 South Magnolia St.
Tallahassee, FL 32301

Date: January 14, 2005
Project: RMBR

We Are Sending You:

Via: 1st Class Mail

United Parcel Service

Attached

Federal Express

Tracking #:

Under Separate Cover

Hand Delivery

Other _____

Copies	Date	No.	Description
1 ea			Certification Forms (Originals) for the Rinker Materials PSD Application

These are Transmitted as Checked Below:

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> For Approval | <input type="checkbox"/> For Review and Comment | <input type="checkbox"/> Resubmit ____ Copies for Approval |
| <input type="checkbox"/> For Your Use | <input type="checkbox"/> Copies Returned After Loan | <input type="checkbox"/> For Signature |
| <input type="checkbox"/> As Requested | <input type="checkbox"/> Returned for Corrections | <input type="checkbox"/> For Signature and Submittal to State |

Remarks:

Copy to:


Signed: _____

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

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

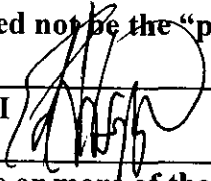
1. Owner/Authorized Representative Name: Charles Allen
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Rinker Materials Street Address: 13011 Cement Plant Road City: Brooksville State: Florida County: Hernando Zip Code: 34601
3. Owner/Authorized Representative Telephone Numbers... Telephone: (532) 799 - 7881 ext. Fax: (532) 799 - 6088
4. Owner/Authorized Representative Email Address: callen@rinker.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature <u>1-03-05</u> Date

RECEIVED
JAN 18 2005
BUREAU OF AIR REGULATION

APPLICATION INFORMATION

Application Responsible Official Certification

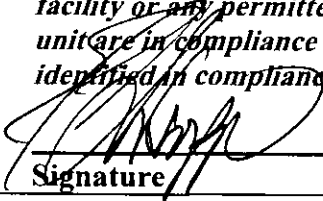
Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Eddie Allsopp, III 
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: Rinker Materials of Florida, Inc. Street Address: 1501 Belvedere Road City: West Palm Beach State: Florida Zip Code: 33406
4. Application Responsible Official Telephone Numbers... Telephone: (561) 820 - 8343 ext. Fax: (561) 659 - 4361
5. Application Responsible Official Email Address: callsopp@rinker.com

APPLICATION INFORMATION

6. Application Responsible Official Certification:

I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.


Signature

1/03/05
Date

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) - C. Date of Delivery</p> <p><i>Charles Davis</i> <i>12-5-05</i></p>
<p>1. Article Addressed to: Mr. Charles Allen Rinker Materials of Florida, Inc. 13011 Cement Plant Road Brooksville, Florida 34601</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7000 1670 0013 3110 2271</p>
<p>PS Form 3811, August 2001</p>	<p>Domestic Return Receipt 102595-02-M-1540</p>

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 1670 0013 3110 2271

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Mr. Charles Allen
Rinker Materials of Florida, Inc.
13011 Cement Plant Road
Brooksville, Florida 34601

PS Form 3800, May 2000 See Reverse for Instructions