

Memorandum

Florida Department of
Environmental Protection

Rec'd 3 Apr '98

TO: John Reynolds
David Zell

FROM: Buck Oven HSO

DATE: April 2, 1998

SUBJECT: Florida Crushed Stone/Central Power & Lime
Request to Modify Conditions, PA 82-17, AO27-321888A, AC27-222095, &
PSD-FL-090B

Please review and comment on the attached letter from John Koogler and return your comments to me.

Attch:

cc: Al Linero
Bill Thomas
Mike Harley



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

March 30, 1998

Mr. Hamilton S. "Buck" Oven, Jr., P.E.
Administrator, Power Plant Siting

Florida Department of
Environmental Protection

2600 Blair Stone Road, Mail Stop 48
Tallahassee, Florida 32399-2400

DEPARTMENT OF
ENVIRONMENTAL PROTECTION
APR 01 1998
SITING COORDINATION

SUBJECT: Florida Crushed Stone Company/Central Power & Lime
Hernando County
Permits AO27-231888A and AC27-222095 - Cement Plant
PA82-17D - Power Plant
Permit PSD-FL-090B - Project

Dear Mr. Oven:

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. This request was previously submitted to Mr. David Zell of the Florida Department of Environmental Protection's Southwest District. Mr. Zell, in consultation with John Reynolds (FDEP Tallahassee DARM) and Pat Comer (FDEP Tallahassee OGC), concluded that this request should be refiled with your office.

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 (AO27-231888A 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. This is shown in the following table:

CALENDAR YEAR	OPERATING SCENARIO DURING COMPLIANCE TESTING
1987	Cement Plant Only
1988	Cement Plant and Power Plant Together
1989	Cement Plant Only Power Plant Only
1991	Cement Plant and Power Plant Together Cement Plant Only
1992	Cement Plant and Power Plant Together Cement Plant Only
1993	Cement Plant and Power Plant Together
1994	Cement Plant and Power Plant Together Cement Plant Only
1995	Cement Plant and Power Plant Together Power Plant Only (NOx)
1996	Cement Plant and Power Plant Together Cement Plant Only
1997	Cement Plant and Power Plant Together
1998 (Anticipated)	Cement Plant and Power Plant Together Cement Plant Only

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 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).

Central Power & Lime recently received a letter from the FDEP Southwest District (see attached FDEP letter dated December 8, 1997). This letter outlined specific testing problems being experienced by the Southwest District. Two of these problems are pertinent to FCS/CPL and this request:

- Testing outside the time period specified in the permit
- Tests delayed because of operational requirements

It is hoped that all of the applicable requirements, regulations, and permit conditions relating to compliance testing can be clarified and reconciled. FCS/CPL believe that this should be accomplished before issuance of any of the various Title V permits for this facility.

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 in the existing permits, and prior to the Title V operation permits which will be issued in the not too distant future.

In proposing amended compliance test requirements, we looked at the planned operating schedule of the FCS/CPL cement plant and power plant. Annually, the cement plant is scheduled for a 7-10 day outage for maintenance, normally during the last quarter of the calendar year. With the power plant, there is a planned outage of approximately six weeks every two years for maintenance. A power plant outage is in effect at the time of this writing, and the cement plant only will be tested during this outage.

Consistent with the requirements of Rule 62-297.310(7)(a)4, F.A.C. and the planned operating schedules of the cement plant and the power plant, the following compliance test requirements are proposed:

Combined Cement Plant/Power Plant Operation

- Test the main plant stack emissions for the following pollutants during each federal fiscal year (October 1-September 30):

Particulate Matter (PM)
Opacity (VE)
Nitrogen Oxides (NOx)
Sulfur Dioxide (SO₂)

All emission testing should be performed at the main plant stack during a period when the cement plant, clinker cooler, raw mill and limestone dryer are operating simultaneously and under normal operating conditions (as currently defined in Specific Condition No. 23 of Permit AO27-231888A), and when the power plant is operating under normal operating conditions and within 90-100 percent of the rate defined in Specific Condition G.1. of PSD-FL-090 as amended August 8, 1995.

Note 1: The note pertaining to the operation of the limestone dryer included as part of Specific Condition 19 of Permit AO27-231888A should be incorporated here.

Note 2: If it is necessary to specify a test date either in amendments to existing permits or in the forthcoming Title V operating permit, it is requested that the period be specified as "within 60 days prior to the date of May 1".

Cement Plant

- Test the main plant stack emissions for the following pollutants every two years during the scheduled outage of the CPL power plant: (the remainder of Specific Condition 19 of Permit AO27-231888A should be incorporated here).

Power Plant

- It is suggested that there be no specific test requirements for the power plant when operating alone as the power plant is scheduled to operate jointly with the cement plant approximately 97 percent of the time (all but 7-10 days per year) and because of the fact there are no New Source Performance Standards applicable to the power plant. Demonstration of compliance with the cement plant and power plant operating jointly, coupled with the compliance demonstration for the cement plant every two years, should provide the Department with reasonable assurance that the joint FCS/CPL facility is operating in compliance with applicable emission limiting standards.

I appreciate your review and consideration of this request. If you have any questions regarding these matters or if additional information is required, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

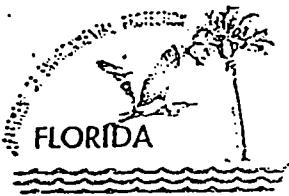


John B. Koogler, Ph.D., P.E.

JBK:scc

Enclosures: FDEP letter dated April 5, 1995
FDEP letter dated December 8, 1997

Copies to: Mr. Joe Piermatteo, FCS
Mr. Ron Aliff, FCS
Mr. Charles Allen, FCS
Mr. David Zell, FDEP-SWD



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

April 5, 1995

Mr. Tom Mountain
Florida Crushed Stone
Post Office Box 1508
10311 Cement Plant Road
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

In response to your letter dated March 30, 1994, the Department will waive the annual compliance test required by permit A027-231888 due to the financial and operational problems that it would necessitate. The Department understands that the source will be tested during the next scheduled Power Plant outage that should be in March 1996. Should your schedule change and a Power Plant shut down be scheduled prior to that time please schedule a compliance test for that shut down. Notify the Department 15 days prior to the next compliance test.

Since this situation may arise again please submit an application to the Department to change permit A027-231888 to require compliance testing that reflects actual operating conditions including Power Plant scheduled outages.

If you should have any questions, please call me at (813)744-6100 extension 119.

Sincerely,

W. A. Prosés
Air Compliance Supervisor

cc: John B. Koogler, Ph.D., P.E. Koogler & Associates



Department of Environmental Protection

JBK ✓
COPY (SCC) ✓
PAR ✓
MIT ✓

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

Bryan E. Adkins
Central Power & Lime, Inc.
P O Box 1508
Brooksville, FL 34605-1508

December 8, 1997

The purpose of this letter is to ask your assistance in solving a problem which has become more prevalent over the last few years. We have noticed that, for some of our permitted facilities, there is a declining trend in the rate of full compliance with their testing requirements. We believe that much of the problem can be attributed to a lack of attention to details of changing permit requirements and failure to understand the implications of missing a required test date (e.g., new EPA guidance will soon cause us to consider a facility which tests more than five days late to be significantly out of compliance). Therefore, we are asking that you take a little time to review your testing requirements, ask us about any points you do not understand, and do the necessary planning to ensure that you do not enter an out-of-compliance condition. For our part, we pledge to work with you to, wherever possible, rationalize your annual testing schedule and find ways to anticipate tests which are about to go overdue so we can help you to avoid the embarrassment and expense of being found to have violated your testing requirements. Please direct any questions to Joe Cox, our data systems person, at (813) 744-6100, extension 129.

As a first step in this process, you may find it helpful to go through all of the permits which are currently in force for your facility and make a list of all testing requirements, including the dates when the tests are to be accomplished. In most cases, the permit will contain one or more specific conditions which specify that testing will be accomplished in a 60-day period ending with a specific date. Caution: these dates may change when a permit is amended or renewed.

The following paragraphs outline some of the specific testing problems we are experiencing and some comments on the action you should take if one or more of these situations applies to you:

a. **Test report unclear.** Although not normally a reason to reject the test, reports frequently contain incomplete or confusing information with regard to designation of the equipment tested—and this leads to delays in processing the report and calls or letters to get the missing information or clarify ambiguous comments. Please ensure that all correspondence about tests (or any other matter regarding your permits) includes a clear statement of your facility's seven-digit A/R/S identification number (in the case of this facility, that is 0530032) and the emission unit numbers of the unit or units tested. You can find the emission unit number or numbers near the beginning of your permit—after the process description and before the first specific condition. It is very important to use these numbers, since there are sometimes facilities with similar names and your name for a piece of equipment may not coincide with its emission unit number (what you call "Unit 2" in the plant may be "Emission Unit 005" in the permit and our database). Imprecise terminology may cause a test to be credited to the wrong facility or emission unit, or use time we could devote to identifying test requirements about to go overdue so we can warn you.

b. **Testing outside the time period specified in the permit.** Some facilities manage to test each year, but perform some of their tests outside the specified testing window. If your test is delayed for some reason (e.g., the emission unit was not operating during that period) one year, the next year's test is not slipped to occur one year later. In cases where you would like to move one or more tests to allow you to consolidate your testing requirements, please contact our office

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and we will try to amend your permit to allow that. Moving test dates without coordinating a permit change could result in having to retest, and we want to help you avoid that expense.

c. Tests delayed because of operational requirements. Sometimes, tests must be delayed for reasons beyond your control (e.g., the equipment is broken down or raw materials are unavailable). In these cases, you should send us a letter as soon as you recognize the problem and coordinate a new testing date. We can grant a reasonable delay and take the necessary steps to keep your facility from being designated out of compliance. Where possible, you should plan outages to avoid this problem or request testing slightly early to avoid going overdue.

d. Tests not required because of special conditions. A few permits contain special conditions which can negate the need for a test. For example, some dual-fueled (oil and gas) equipment does not require a visible emissions test if oil is burned for less than 400 hours in the year preceding the test date. In cases such as this, you should send a letter certifying that you have met the requirements for waiver of the test. Please do not assume that we know you are burning only gas—we need a document to form the basis for moving the date of the next required test to the following year.

e. Test notification not timely. Generally, permits require that you notify our office at least 15 days prior to conducting a test. We need this time to plan our attendance at some of the tests (we are required to audit a portion of the tests conducted in our District). Sometimes, circumstances arise which make it difficult for you to comply with this requirement. In those situations, please call our office as soon as you are aware of the problem and we will try to work with you to find a mutually acceptable solution; however, do not assume that we will be able to accommodate you, especially in cases where the reason for the problem is simply failure to adequately plan ahead.

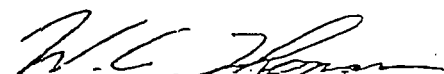
f. Required submittals not included with report. Some permits require the submission of additional information, such as process rates or fuel analyses, with the test report. Failure to submit this information could invalidate the test and require you to go to the expense of conducting another test. Since reports frequently arrive at our office after the end of the testing window, rejection of a test would probably mean that your facility would not have met its obligation to demonstrate compliance with the permit. Please ensure that the test team conducting your test understands and complies with all of the provisions in your permits which affect the test.

Again, if you have any questions about any of the situations listed above, or any other matter, please call or send us a letter asking for clarification. It is very important that you understand all of the conditions in your permit.

We would also like to take this opportunity to let you know that there is serious consideration being given to holding one or more seminars in mid-January to discuss tools and techniques for completion of Annual Operating Reports. If this seminar does take place, it will be an opportunity to get help in locating sources of information and ensure you understand all of the instructions for completion of the report.

Thank you in advance for your support of our efforts to help you comply with your testing and reporting requirements. Together, we can make Florida's compliance rate the best in EPA Region 4.

Sincerely,



William C. Thomas
Air Program Administrator