



KA 307-05-04/308-05-03
March 7, 2006

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

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400

RECEIVED

MAR 08 2006

BUREAU OF AIR REGULATION

**RE: DRAFT Title V Permit Renewal (Facility ID No. 0530021); Comments
Florida Crushed Stone Company, Brooksville Cement and Power Plants**

Dear Bruce:

Florida Crushed Stone Company and Central Power and Lime (FCS/CPL) have reviewed the DRAFT Title V Permit (DEP Project No. 0530021-011-AV) issued by the Department on December 14, 2005. FCS/CPL are submitting the following comments on the DRAFT permit. The comments are briefly described below and are contained in the attached copy of the DRAFT Title V Permit.

DRAFT Title V Permit

Section I. Subsection A. Facility Description, Page 2

FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. This sentence was revised to reflect this.

Section I. Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s)

The facility ID numbers and emission unit descriptions have been clarified for EU 009, 010, 014, and 021.

Section I. Subsection B, Page-8

The facility ID numbers and emission unit descriptions have been clarified for EU 009/K-07&L-03, EU 010/L-06 to L-05&L-07, EU 014/Q-17 and EU 021/Q-18.

Section I. Subsection B, Pages 8-10

The terminology “actual” has been changed to “design” since the flow rates are design flow rates for all emission units. Also “maximum” has been changed to “corresponding to” for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Section I. Subsection B, Page 9

The emission unit descriptions have been clarified for EU 009 (Clinker Cooler Discharge with Baghouse), EU 010 (Clinker Storage Silos with Baghouse), EU 014 (Cement Storage Silos #1 and #2 A-Side Discharge System with Baghouse), and EU 021 (Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse).

Section II. Subsection B, Page 11, Condition B.3., Permitted Capacity

The emission unit descriptions have been clarified for EU 009, 010, 014, and 021.

Section II. Subsection B, Page 12, Condition B.4.

The emission unit name has been revised for the Silo #3 Discharge System.

Section II. Subsection B, Page 12, Condition B.7., Emission Limitations

The emission unit descriptions have been clarified for EU 009, 010, 014, and 021.

Section II. Subsection B, Page 16, Condition B.21(a) and (a)3.

This condition has been revised to reflect two minor editorial comments.

Section II. Subsection D, Page 22, Clinker Receiving/Handling System

FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. The emission unit description was revised to reflect this.

Additionally, Condition D.0. was deleted since the requirement to notify the Department prior to operation of the water spray system (which was proposed in lieu of the Johnston-Marsh on

equivalent dust suppression system) would no longer be required. This requirement was added as a condition of using the water spray system instead of the Johnston-Marsh dust suppression system.

Section II. Subsection D, Page 24, Condition D.14.

The paragraph was revised to reflect a minor editorial change.

Section II. Subsection D, Page 24, Condition D.15.

The page break was removed.

Section II. Subsection D, Page 25, Condition D.19.

The page break was removed.

Section II. Subsection D, Page 26, Condition D.19(c).

The sentence was revised to reflect a minor editorial change.

Section II. Subsection D, Page 28, Condition D.23.

The rule citation was corrected from 62-206 to 62-204, F.A.C.

Section II. Subsection D, Page 30, Condition D.28(c)20.

The page break was removed.

Section II. Subsection D, Page 32

In the emission unit description, the plant design rate has been corrected to 83 TPH (or 1992 TPD). The terminology “actual” has been changed to “design” since the flow rates are design flow rates for all emission units. Also “maximum” has been changed to “corresponding to” for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Section II. Subsection D, Page 33, Condition F.6.b.1.

FCS has deleted “and during times of power plant startup” as compliance was demonstrated under this operating scenario on December 12-13, 2005. There is no reason therefore, to restrict operation under this scenario and condition F.6.b.3. allows for condition F.6.b.1 amendments.

Section II. Subsection D, Page 34, Condition F.7.

The sentence has been clarified to reflect the correct terminology and rate. The preheater feed rate is a parameter that is measured and this is limited by condition F.3. and corresponds to the kiln feed rate of 127 TPH.

Section II. Subsection D, Page 35, Condition F.11.

CPL name was revised.

Section II. Subsection D, Page 37, Condition F.16.

The rule citation “63 CFR 63.1345” was corrected to “40 CFR 63.1345”.

Section II. Subsection D, Page 39, Condition F.18. and F.19.

These conditions were revised to allow the use of test methods 6C and 7E for SO₂ and NO_x, respectively. Both method 6C and 7E have been used for compliance for years with Department approval.

Section II. Subsection D, Page 44, Condition F.29.

The sentence was clarified to state that the materials fed to the kiln are continuously measured to estimate clinker production. Clinker is not directly measured due to its high temperature, rather is estimated using the measured amounts of material fed to the preheater.

Section II. Subsection D, Page 44-45, Condition F.31.

This condition states that a mass emissions rate is calculated from a FDEP approved conversion factor in the first sentence and then states in the second sentence that a flow monitor must be used. This condition has been revised to state that a flow monitor or FDEP approved conversion factor can be used. FCS/CPL will be submitting data to support an acceptable conversion factor.

Section II. Subsection D, Page 45, Condition F.32.

A statement was added to allow the use of a flow monitor or a FDEP approved conversion factor. FCS requests to have the references to 40 CFR 60.45 and to 40 CFR 60.13 removed. This is because 40 CFR 60.45 does not apply to cement plants and the NESHAP supersedes the NSPS requirement of 40 CFR 60.13. The reference to 40 CFR 63.1350 is already cited in this condition.

Section II. Subsection D, Page 46, Condition F.39.

The page break was deleted.

Section II. Subsection D, Page 51, Emission Unit Description

The terminology “actual” has been changed to “design” since the flow rates are design flow rates for all emission units. Also “maximum” has been changed to “corresponding to” for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Section II. Subsection I, Page 58, Power Plant Boiler

A minor typographical error was corrected in the emission unit description.

Section II. Subsection I, Page 61, Condition I.7.b.

A minor typographical error was corrected.

Section II. Subsection I, Page 61, Condition I.19.

This condition was revised to allow the use of test method 6C in addition to test method 6 for SO₂. Method 6C has been used for compliance for years with Department approval.

Section II. Subsection I, Page 61, Conditions I.21, I.22, and I.24.

The reference to 40 CFR 60.8 was replaced with 40 CFR 60, Appendix A, since the NSPS does not apply. 40 CFR 60, Appendix A provides the technical requirements without a non-applicable rule reference.

Section II. Subsection I, Page 61, Conditions I.26.

The rule citation for 40 CFR 60.46 was removed since it does not apply.

Section II. Subsection I, Page 62, Condition I.29.

A minor typographical error was corrected.

Section II. Subsection I, Pages 63-64, Condition I.34.

The numbering of this condition was revised.

Section II. Subsection I, Page 65, Condition I.41.

A statement was added to allow the use of a flow monitor or a FDEP approved conversion factor as previously described.

Although the permit contained a requirement to comply with the "applicable" requirements of 40 CFR 60.45 and 60.13, this requirement has proven to be a source of confusion because the power plant is not subject to the New Source Performance Standards (see PA 82-17, June 13, 1983 at 29; BACT Determination, May 20, 1983 at 1). The original reference to these provisions was thus in error. Moreover, as these provisions in fact are not applicable to the plant, the vague reference to the "applicable" parts of these sections creates uncertainty as to what the facility is required to do on a going forward basis with respect to the monitoring equipment. It has been the facility's understanding, based on the history of the facility and prior communications with the FDEP, that the intent of this provision was to require the facility to comply with applicable Florida regulations as well as the performance standards set forth in 40 CFR Part 60 Appendix B. Accordingly, FCS requests, in the interest of clarifying Section I.41., that the reference to the applicable requirements of 40 CFR 60.45 and 60.13 be deleted and that Section I.41. be revised to make it clear that the monitoring devices meet the applicable requirements of Chapter 62-297, F.A.C. and 40 CFR Part 60 Appendix B.

The statement "The permittee shall provide the Department with 30 days notice on each certification." has been removed since FCS provided the required initial certification for SO₂ and opacity in 1991.

Clarification has been added to this permit condition for the certification of each device and to note that this emission unit is not subject to the NSPS.

Statement of Basis

Page 1 of 5

FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. This sentence was revised to reflect this installation.

Pages 1-3 of 5

The terminology "actual" has been changed to "design" since the flow rates are design flow rates for all emission units. Also "maximum" has been changed to "corresponding to" for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Page 2 of 5

The emission unit descriptions have been clarified for EU 009 (Clinker Cooler Discharge with Baghouse), EU 010 (Clinker Storage Silos with Baghouse), EU 014(Cement Storage Silos #1 and #2 A-Side Discharge System with Baghouse), and EU 021(Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse).

Very truly yours,

KOOGLER & ASSOCIATES



Fawn W. Bergen, P.E.
Project Engineer

FB

Enclosure: Draft Title V Permit Comments
Statement of Basis Comments

cc: C. Allen, FCS
J. Daniel, FCS
H. Eisenberg, Skadden, Arps
J. Koerner, FDEP
R. Moreno, Delta Power
T. Mountain, Coastal Engineering
B. Noble, Delta Power
S. Rahman, Delta Power
M. Vardeman, Rinker



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 308-05-03

March 3, 2006

Teri Donaldson, Esquire
Office of General Counsel
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Second Extension of Time to File a Petition
Florida Crushed Stone Company
Brooksville Cement and Power Plants, Hernando County
DEP File No. 0530021-011-AV

Dear Ms. Donaldson:

Attached is a request for a second extension of time to file for a hearing in accordance with Rule 28-106, FAC.

Mr. Bruce Mitchell, the permitting engineer, has been notified of this extension.

If you have any questions concerning this request, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

Fawn W. Bergen, P.E.

FWB
Encl.

C: J. Daniel, FCS Brooksville
B. Mitchell, FDEP
M. Vardeman, Rinker

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

Florida Crushed Stone Company
PO Box 1508
Brooksville, Florida 34605

FDEP File No. 0530021-011-AV

MOTION FOR EXTENSION OF TIME

The Applicant, Florida Crushed Stone Company, by and through its undersigned Engineer of Record and pursuant to Rule 28-106, FAC, requests the Secretary of FDEP to grant a 45-day second extension of time in which to file a petition. This will allow submittal of additional information to FDEP on the permit application review and allow time to resolve issues of concern.

Dated the 3rd day of March, 2006, in Gainesville, Alachua County, Florida.

Koogler & Associates, Inc.
Environmental Services




Fawn W. Bergen, P.E.
Engineer of Record
Florida Registration No. 61614
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Teri Donaldson, Office of the General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and Mr. Bruce Mitchell, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399, Mr. Michael Vardeman, Rinker Materials Corporation, 1200 NW 137th Avenue, Miami, Florida 33182, and Mr. James Daniel, Florida Crushed Stone Company, PO Box 1508, Brooksville, Florida 34605, by FAX and by UPS, this 3rd day of March, 2006.



Fawn W. Bergen, P.E.

Florida Registration No. 61614





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DEC 01 2005

Letter of Transmittal

BUREAU OF AIR REGULATION

DEC 2005

DATE:	11/30/05	PROJECT NO:	BUREAU OF AIR REGULATION 3080503/3070504
TO:	FDEP Tallahassee		
ATTENTION:	Mr. Bruce Mitchell		
REGARDING:			
Waiver of time period to issue draft Title V permit—Florida Crushed Stone Brooksville.			

WE ARE FORWARDING TO YOU THE FOLLOWING:

Copies	Description
1	Waiver request

THESE ARE TRANSMITTED BY:

<input type="checkbox"/> REGULAR MAIL	<input type="checkbox"/> DELIVERED
<input type="checkbox"/> OVERNIGHT	<input type="checkbox"/> CLIENT PICK UP
<input checked="" type="checkbox"/> 2 DAY	<input type="checkbox"/> OTHER: _____

REMARKS:

This is a hard-copy follow-up to the fax sent to you on November 30, 2005.

cc: _____ SIGNED: _____

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DEC 01 2005

BUREAU OF AIR REGULATION

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WAIVER OF 90 DAY TIME LIMIT FOR ISSUANCE OF PERMIT
UNDER SECTIONS 120.60(1) and 403.0876, FLORIDA STATUTES

Applicant: **Florida Crushed Stone Company—Brooksville Cement & Power Plants**

DEP File No.: **0530021-011-AV**

The undersigned has read Sections 120.60(1) and 403.0876, Florida Statutes (F.S.), and fully understands the applicant's rights under those sections.

With regard to the above referenced permit application, the applicant hereby, with full knowledge and understanding of its rights under Sections 120.60(1) and 403.0876, F.S., waives the right under those statutes to have the application for a permit issued or denied by the State of Florida Department of Environmental Protection within the ninety day time period proscribed in those sections. Said waiver is made freely and voluntarily by the applicant, is in its self-interest, and is made without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on December 31, 2005.

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

 11/30/05
Signature/Date

Fawn W. Bergen, P.E.
Name/Title (please print)



Project No. 3080503-
3070504

Fax

To:	Bruce Mitchell, FDEP	
Fax No.:	850-921-9533	
From:	Fawn Bergen, P.E.	Fax No.: 352-377-7158
Date:	November 30, 2005	Time: 10:59 AM
Sent By:	FWB	

*This message consists of 1 page(s) PLUS this cover sheet.
If you experience difficulties with this transmission, please call 352-377-5822.*

Remarks:

Bruce—Here is the waiver extending the time period until December 31, 2005. Thanks again for all of your help!

-Fawn

Original document will not follow by mail.

This message is intended for use only by the individual to whom it has been addressed, and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at 352-377-5822 so we can prevent any recurrence. Thank you.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

WAIVER OF 90 DAY TIME LIMIT FOR ISSUANCE OF PERMIT
UNDER SECTIONS 120.60(1) and 403.0876, FLORIDA STATUTES

Applicant: **Florida Crushed Stone Company—Brooksville Cement & Power Plants**

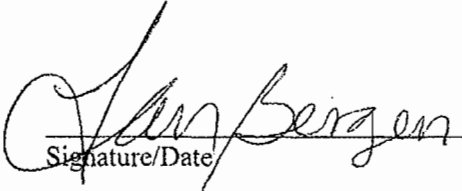
DEP File No.: **0530021-011-AV**

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With regard to the above referenced permit application, the applicant hereby, with full knowledge and understanding of its rights under Sections 120.60(1) and 403.0876, F.S., waives the right under those statutes to have the application for a permit issued or denied by the State of Florida Department of Environmental Protection within the ninety day time period proscribed in those sections. Said waiver is made freely and voluntarily by the applicant, is in its self-interest, and is made without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on December 31, 2005.

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

 11/30/05
Signature/Date

Fawn W. Bergen, P.E.
Name/Title (please print)



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

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400

KA 263-05-03
October 20, 2005

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OCT 21 2005

BUREAU OF AIR REGULATION

**RE: Title V Renewal Application (Facility ID No. 0530021); PM CAM Plan for the Power Plant Boiler
Florida Crushed Stone Company, Brooksville Cement and Power Plants**

Dear Bruce:

This letter serves as a follow-up to a recent telephone conversation that we had regarding the particulate matter (PM) compliance assurance monitoring (CAM) plan for the Power Plant Boiler at Florida Crushed Stone's Brooksville Cement and Power Plants. Attached to this letter is the requested CAM plan for the Power Plant Boiler for PM emissions.

If you have any questions regarding this submittal, please feel free to contact me at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES

Fawn W. Bergen, P.E.
Project Engineer

FB

Enclosure: CAM Plan

cc: J. Holtom, FDEP
R. Peltage, FCS-Brooksville
T. Mountain, Coastal Engineering
M. Vardeman, Rinker-Miami

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Fawn Bergen, PE Registration Number: 61614
2. Professional Engineer Mailing Address... Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377 - 5822 ext. 29 Fax: (352) 377 - 7158
4. Professional Engineer Email Address: fbergen@kooglerassociates.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature <u><i>Fawn Bergen</i></u> Date <u><i>10/20/05</i></u> (seal) NO. 61614

* Attach any exception to certification statement.

Attachment FCB-EU15-ITV2
Compliance Assurance Monitoring Plan for PM/PM₁₀
Power Plant Boiler

I. Background

a. Emissions Unit

Description: Power Plant Boiler

EU Identification: EU 018

Facility: Florida Crushed Stone Company
Brooksville Cement and Power Plants

b. Applicable Regulations, Emission Limits, and Monitoring Requirements

Permit No.: 0530021-007-AV

Regulated Pollutant: PM/PM₁₀

Emission Limit: 0.015 lb/MMBtu while burning No. 2 fuel oil; 0.0135 lb/MMBtu (25.0 lb/hr @1,850 MMBtu/hr heat input), averaging time per 40 CFR 60.46 for the Power Plant Boiler only; and 0.0135 lb/MMBtu (25.0 lb/hr @1,850 MMBtu/hr heat input) plus 0.3 lb/ton from the Cement Kiln I and 0.1 lb/ton from the Clinker Cooler (kiln feed dry basis), averaging time per 40 CFR 60.46. [PA 82-17 and PA 82-17E; PSD-FL-090 and PSD-FL-090D; and, BACT]

Monitoring: Currently required to continuously monitor SO₂ emissions and opacity.

c. Control Technology

The Power Plant Boiler currently utilizes a dry limestone injection scrubbing system to control SO₂ emissions and a baghouse to control PM/PM₁₀ emissions.

II. Monitoring Approach

	Indicator No. 1	Indicator No. 2
I. Indicator Measurement Approach	Pressure drop across baghouse.	Change in duct opacity.
	The pressure drop across the baghouse is measured with a differential pressure transmitter.	Continuous opacity monitoring systems (COMS).
II. Indicator Range	An excursion is defined as a pressure drop outside of the range of 0 to 10 inches of water . Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as any sudden and sustained step-change (increase) in opacity as documented by the trend of the consecutive 6-minute averages (other than startup and shutdown periods). Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representativeness B. Verification of Operational Status C. QA/QC Practices D. Monitoring Frequency Data Collection Procedures Averaging Period	Based on available data under normal operation, the pressure drop range is between 0 to 10 inches of H ₂ O.	Based on available data under normal operation, opacity varies with load and operating conditions. Variability is typically a gradual increase or decrease, with occasional sudden spikes and dips. A sudden and sustained step-increase in opacity could indicate a failure in one or more baghouse compartments.
	N/A	N/A
	The differential pressure transmitter is calibrated every 2 years according to the manufacturer's specification.	The COM system is audited quarterly.
	Pressure drop is monitored continuously.	Opacity is monitored continuously.
	Readings are recorded once every 5 seconds by the computer system.	The COMS collects data that are reduced to 6-minute averages. Consecutive 6-minute averages are tracked through the computerized system and COM software.
	1-hour average of 5-second readings.	None.

III. Justification

a. Background

This emissions unit is a net delivered 150 megawatt (MW) fossil fuel fired boiler. Control equipment includes a dry limestone injection scrubbing system followed by a fabric filter baghouse system. A differential pressure transmitter is used to measure pressure drop across the baghouse. Opacity is continuously monitored with the COMS.

b. Rationale for Selection of Performance Indicators

In general, baghouses are designed to operate at a relatively constant pressure drop. Monitoring pressure drop provides a means of detecting a change in operation that could lead to an increase in emissions. An increase in pressure can indicate that the cleaning cycle is not frequent enough, cleaning equipment is damaged, the bags are becoming blinded, or the airflow has increased. A decrease in pressure drop may indicate broken or loose bags. A pressure drop across the baghouse also serves to indicate that there is airflow through the control device.

A sudden sustained step-increase in opacity could indicate a failure in one or more of the baghouse compartments.

c. Rationale for Selection of Indicator Ranges

The indicator range chosen for the baghouse pressure drop is between 0 to 10 inches of H₂O. An excursion triggers an inspection, corrective action, and a reporting requirement. The pressure drop is continuously recorded every 5 seconds and hourly averages are computed. The differential pressure transmitter is calibrated every two years according to manufacturer's specifications.

The baghouse is a self-cleaning system. Approximately every 45-50 minutes, the bags self-clean. The bag cleaning cycle does not begin based on pressure drop, but rather begins based on the time since it was last cleaned. Therefore, the maximum pressure drop of the proposed indicator range is based on operational data indicative of a problem with the baghouse instead of a manufacturer's specification for the bags to begin their cleaning cycle.

The minimum pressure drop of 0 inches of H₂O was selected because a low pressure drop for this baghouse system does not indicate a problem with PM emissions. It could indicate a problem with opacity, but opacity is continuously monitored with a COMS.



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
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KA 124-05-02
October 20, 2005

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OCT 21 2005

BUREAU OF AIR REGULATION

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400

**RE: Title V Renewal Application (Facility ID No. 0530021); SO₂ and NO_x CEMS
Florida Crushed Stone Company, Brooksville Cement and Power Plants**

Dear Bruce:

This letter serves as a follow-up to a recent telephone conversation that we had regarding the purpose of the sulfur dioxide (SO₂) and nitrogen dioxide (NO_x) continuous emissions monitoring systems (CEMS) on the Cement Kiln/Power Plant Boiler stack at Florida Crushed Stone Company's (FCS's) Brooksville Cement and Power Plant. The intent of the CEMS at the FCS Brooksville facility was never to demonstrate compliance with the permitted emission limits. They were intended for reasonable assurance to the Department that the emission limiting standards were being met. The attached report summarizes the history, permit requirements, and discussion about the intent of the CEMS.

If you have any questions regarding this report, please feel free to contact me or Dr. John Koogler, PE, at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES

Fawn W. Bergen, P.E.
Project Engineer

FB

Enclosure: Report

REVIEW OF CONTINUOUS EMISSION MONITORING REQUIREMENTS AT FCS

During the original permitting of the Florida Crushed Stone Cement Plant/ Power Plant Complex in 1983, there was considerable discussion regarding an acceptable sulfur dioxide emission rate from the complex. Florida Crushed Stone (FCS) agreed during the permitting process to control SO₂ emissions by limestone injection. The sulfur dioxide emission limit agreed upon and reflected in the original power plant site certification (Case No. PA82-17, dated June 13, 1983) envisioned a 30 percent overall SO₂ removal efficiency. To verify this efficiency, it was required that FCS install a continuous SO₂ monitor. Specifically, the site certification stated:

... The Department has determined that the power plant and cement plant, operating together, shall not be allowed to emit SO₂ in excess of 1250 pounds per hour (the equivalent of a 30% overall in-process SO₂ removal efficiency). To verify these limits, the Department has determined that BACT will include the installation of a continuous SO₂ monitor. The analyzer data will produce a record of SO₂ emissions during the various operating modes. These data would not be obtainable with periodic manual stack tests.

The specific air monitoring requirements of the site certification were detailed in Section I of Appendix I of the site certification. In Section I.B., Air Monitoring Program, the requirements for continuous monitors were detailed. These requirements specified that FCS:

*... install and operate continuous monitoring devices for the boiler exhaust for sulfur dioxide and opacity to demonstrate compliance with the pound-per-hour SO₂ emission limits and visible emission limits respectively,
.... The monitoring devices shall meet the applicable*

requirements of Section 17-2.710, F.A.C., and 40 CFR 60.45, and 40 CFR 60.13 including certification of each device. [Note: The requirements of 17-2.710, F.A.C., 40 CFR 60.45 and 40 CFR 60.13 were as of June 1983.]

The federal rules referenced in the site certification specify that the SO₂ monitor be installed and certified in accordance with whatever requirements existed at the time. It is likely that the installation and certification would have been in accordance with 40 CFR 60, Appendix B which became effective in March 1983. Based on this certification, the monitor could have been used for reasonable assurance but not for compliance, as discussed below.

At the time of site certification (June 13, 1983), neither 40 CFR 60, Appendix F (Quality Assurance Procedures for Continuous Emission Monitors) nor 40 CFR 75 (Continuous Emission Monitoring) had been promulgated. 40 CFR 60, Appendix F was promulgated in December 1987 and 40 CFR 75 was promulgated in January 1993. Thus, even with the continuous SO₂ emission monitor installed and certified in accordance with 40 CFR 60, there was no mechanism for verifying the quality of the data generated by the monitor on a continuing basis. For this reason, the SO₂ monitoring data (measured stack gas concentrations of SO₂ in parts per million) could not have been used for compliance even if the emission limit was a concentration limit (ppm).

Furthermore, for the continuously monitored sulfur dioxide concentrations to be used to demonstrate compliance with the "pound-per-hour" SO₂ emission limit, FCS would have also been required to install a continuous stack gas flow monitor and such monitors were either nonexistent or unreliable in 1983 (see the reference to the promulgation of 40 CFR 75 above).

Elsewhere in the Site Certification document, compliance based on specific EPA test methods was addressed. In Section I.C., Stack Testing, of Appendix I there was a requirement for annual compliance tests for particulate matter, SO₂, NO_x, and visible emissions, in accordance with the requirements of 40 CFR 60.46. As these tests were to be performed in accordance with recognized manual EPA test methods (including the measurement of stack gas

flow) the results of these tests would have been the only verifiable demonstration of compliance available for FCS to provide the Department.

In related permit documents, the original air construction permits for the kiln/raw mill and cooler (AC27-61016, dated November 10, 1983 and Permit AC27-118674, dated August 26, 1986) both specify that compliance with the SO₂ and NO_x emission limiting standards be demonstrated with EPA Methods 6 and 7, respectively.

While not documented by permit, there were discussions between FCS and FDEP, once the cement plant and power plant became operational, as to how the SO₂ emission rate (pounds per hour) was to be determined from the continuous SO₂ monitoring data. The discussions revolved around the use of a calculated flow using an "F" factor or some modification thereof to account for the CO₂ generated by the cement plant.

It wasn't until permits were issued to Florida Crushed Stone authorizing the use of tire derived fuel that continuous NO_x monitoring was required and a method to convert the stack gas concentrations (of NO_x) to a mass emission rate was specified. Permit AC27-222095, issued December 21, 1992, was the construction permit authorizing the use of tire derived fuel. Specific Condition 10 of that permit required FCS to install a continuous NO_x monitor in the kiln/cooler/power plant stack and to convert the measured concentrations to a mass emission rate (pounds per hour) using an FDER approved conversion factor. The condition further required FCS to install a stack gas flow monitor within six months following the promulgation of 40 CFR 75 (Continuous Emission Rate Monitoring). This flow rate monitor was to be used in place of the "FDER approved conversion factor" to convert the NO_x concentrations to a mass emission rate.

The language of Specific Condition 10 of Permit AC27-222095 (December 1992), requiring the installation of a continuous flow rate monitor only after the promulgation of 40 CFR 75, supports the fact that neither technology nor procedures for continuous flow rate monitoring existed at the time the original power plant site certification document was signed in 1983. This in turn supports the fact that there was no reliable way to convert the monitored

stack gas SO₂ concentration to a mass emission rate (pounds per hour) in 1983; and therefore the SO₂ monitoring could have been required only for reasonable assurance.

Air Operating Permit AO27-231888 (issued March 11, 1994 to replace AC27-222095) repeats the requirement to install a continuous NO_x monitor in the kiln/cooler/power plant stack and to install a continuous flow rate monitor upon promulgation of 40 CFR 75. It should be noted that neither the air construction permit nor the air operating permit specify that the NO_x emission monitoring was to be used for compliance purposes. Specifically, Permit AO27-231888 (Specific Condition 23) specifies that the compliance with the SO₂ and NO_x emission limiting standards shall be determined using EPA Methods 6 and 7E respectively.

It is interesting to note that Permit AO27-231888 (issued for the cement plant) also incorporates the power plant siting requirement to continuously monitor sulfur dioxide emissions. The validity of this condition is questionable as it had not appeared in any prior air construction permit for the cement plant.

The other thing that Permit AO27-231888 specified (for the first time in any permit) was the use of the unmodified "F" factor for converting the NO_x concentrations to mass emission rates prior to the promulgation of 40 CFR 75. As stated previously, the "F" factor without a modification is not a valid factor for this conversion as it does not take into consideration the CO₂ generated by the cement plant. With such an error, the converted data could never have been used for compliance.

The original Title V Permit (0530021-002-AV issued October 26, 2000) required continuous monitors for both NO_x (Condition E.27) and SO₂ (Condition E.29). In neither case was it specified that these monitors were to be for compliance purposes. Conditions E.15 and E.16 address compliance demonstration for SO₂ and NO_x and specify EPA Methods 6 and 7 respectively.

In conclusion, it is apparent that the monitoring of SO₂ emissions from the power plant as required by the power plant site certification could not have been for compliance purposes as

there was neither the technology nor the procedures for reliable stack gas flow rate monitoring at the time of site certification in 1983. The only legitimate purpose for the monitoring would have been to provide the Department reasonable assurance that the 30 percent SO₂ reduction was being achieved. Department permits issued up to 10 years after the original site certification still referred to the use of a "Department approved conversion factor" to convert monitored stack gas concentrations to a mass (pound-per-hour) emission rate. Certainly the use of the Department envisioned "F" factor for determining flow would not have been reliable enough to use in conjunction with the monitored SO₂ data for compliance purposes as this factor does not take into consideration the CO₂ generated by the cement plant.

Regarding NO_x monitoring, none of the references to the NO_x monitor (first required in conjunction with the use of tire derived fuel in 1993) indicate that this monitor was to be used for compliance purposes. The NO_x monitor was obviously intended to provide reasonable assurance that the NO_x emission limit was continually met while firing tires as a supplemental fuel in the cement plant.

The only consistent reference to compliance demonstration in all Department issued permits and in the site certification document is the reference to the use of manual or instrumental EPA test methods (Method 1-7E), all described in 40 CFR 60, Appendix A. Because of this consistency and because of the inadequacies related to the flow rate determination required to convert the continuous SO₂ and NO_x monitoring data to mass emission rates (pounds per hour), it is apparent that the SO₂ and NO_x continuous monitors were always meant only to provide the Department with reasonable assurance that emission limiting standards were being met; not to demonstrate compliance with emission limiting standards.

STATEMENT OF BASIS

Florida Crushed Stone Company
Brooksville Cement and Power Plants
Facility ID No.: 0530021
Hernando County

Title V Air Operation Permit Renewal
DRAFT Permit No.: 0530021-011-AV

The initial Title V Air Operation Permit became effective October 18, 2000. This permitting action is for the renewal of the Title V Air Operation Permit and the incorporation of the terms and conditions established in Air Construction (AC) Permit, No. 0530021-010-AC, issued 05/16/2005. The renewal is being issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The facility is an integrated facility that includes a Portland cement manufacturing plant, a power plant, and a coal yard. The power boiler is a coal fired unit that is allowed to generate a net delivered 150 MW. The cement kiln 1, in-line kiln/raw mill and clinker cooler 1 share a common baghouse fabric filter system (for particulate matter emissions control) and stack with the power plant; and, dry limestone injection is used to control SO₂ emissions from the power boiler, which is then collected in the common baghouse fabric filter system. Waste heat from the kiln is used to provide heat to the raw mill and the kiln preheater, which is used to drive off moisture from the materials used for making clinker. All of the materials handling activities are controlled by fabric filter baghouse control systems, except for the Clinker Receiving/Handling System and the coal yard activities. For the Clinker Receiving/Handling System, the fugitive particulate matter emissions generated from the transfer of clinker from the receiving hopper to the belt conveyor are controlled using ~~a Johnston-Marsh or equivalent dust suppression system~~. Water sprays or chemical wetting agents and stabilizers will be used at the coal receiving area, the coal storage area, and the coal transfer system to control fugitive particulate matter emissions and minimize visible emissions. All fly ash handling systems (including transfer and silo storage) will be totally enclosed and vented (including pneumatic system exhaust) through fabric filters.

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A CAM plan was required for particulate matter for the shared baghouse control system of the cement kiln 1, in-line kiln/raw mill, clinker cooler 1 and the power plant.

Brooksville Cement Plant 1:

The following emissions units are regulated under Rule 62-297.620(4), F.A.C., Exceptions and Approval of Alternate Procedures and Requirements; Rules 62-212.400 and 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD-FL-091) and Best Available Control Technology, respectively; Power Plant Siting: PA 82-17 and PA 82-17(A thru K); 40 CFR 60, Subpart F, Standards of Performance for Portland Cement Plants, adopted in Rule 62-204.800, F.A.C.; and, 40 CFR 63, Subpart LLL, National Emissions Standards for Hazardous Air Pollutants from Portland Cement Manufacturing Industry, adopted in Rule 62-204.800, F.A.C., by June 10, 2002.

Filter Dust Bin with Baghouse. This emissions unit is a storage bin for fines (dust). The particulate matter (PM) emissions from the materials being transferred are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The ~~design~~ volumetric flow rate is 6,800 acfm; and, the ~~corresponding~~ dry standard flow rate is 6,686 dscfm.

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Fly Ash/Equilibrium Catalyst Bin with Baghouse. This emissions unit is a storage bin for fly ash/equilibrium catalyst. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The ~~design~~ volumetric flow rate is 4,200 acfm; and, the ~~corresponding~~ dry standard flow rate is 4,130 dscfm.

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STATEMENT OF BASIS

Florida Crushed Stone Company

DRAFT Title V Permit Renewal No.: 0530021-011-AV

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Raw Meal Transfer with Baghouse. This emissions unit is an activity of raw meal being transferred from the storage bins to the raw mill. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 70 feet, with an exit diameter of 1.0 feet and an exit temperature of 180 °F. The **design** volumetric flow rate is 1,200 acfm; and, the **corresponding** dry standard flow rate is 970 dscfm.

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Two Blend Storage Silos with Baghouse. This emissions unit is two storage silos for the raw meal being transferred from the raw mill. The PM emissions are controlled by a single low temperature baghouse fabric filter system. The stack height is 240 feet, with an exit diameter of 3.5 feet and an exit temperature of 180 °F. The **design** volumetric flow rate is 17,000 acfm; and, the **corresponding** dry standard flow rate is 13,745 dscfm.

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Kiln Feed Surge Bin with Baghouse. This emissions unit is an activity of materials being pre-heated in the pre-heater and transferred to the kiln. The PM emissions are controlled by a medium temperature baghouse fabric filter system. The stack height is 50 feet, with an exit diameter of 2.0 feet and an exit temperature of 200 °F. The **design** volumetric flow rate is 6,000 acfm; and, the **corresponding** dry standard flow rate is 4,704 dscfm.

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Clinker Cooler Discharge with Baghouse. This emissions unit is an activity of clinker transfer from the clinker cooler to the deep bucket conveyor (L-03), which conveys clinker to clinker storage. The PM emissions are controlled by a medium temperature baghouse fabric filter system. The stack height is 10 feet, with an exit diameter of 1.0 feet and an exit temperature of 250 °F. The **design** volumetric flow rate is 5,100 acfm; and, the **corresponding** dry standard flow rate is 3,717 dscfm.

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Clinker Storage Silos with Baghouse. This emissions unit is an activity of clinker being transferred to the finish mill. The PM emissions are controlled by a single medium temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 1.5 feet and an exit temperature of 200 °F. The **design** volumetric flow rate is 2,600 acfm; and, the **corresponding** dry standard flow rate is 2,038 dscfm.

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Gypsum and Limestone Bins with Baghouse. This emissions unit is an activity of gypsum and limestone being stored and transferred. The PM emissions are controlled by a single medium temperature baghouse fabric filter system. The stack height is 135 feet, with an exit diameter of 1.5 feet and an exit temperature of 200 °F. The **design** volumetric flow rate is 5,000 acfm; and, the **corresponding** dry standard flow rate is 3,920 dscfm.

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Silo Discharge with Baghouse. This emissions unit is an activity of clinker, gypsum or limestone being transferred from their silos. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 135 feet, with an exit diameter of 2.5 feet and an exit temperature of 100 °F. The **design** volumetric flow rate is 9,000 acfm; and, the **corresponding** dry standard flow rate is 8,316 dscfm.

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Finish Mill with Baghouse. This emissions unit combines clinker and gypsum to form cement. The PM emissions are controlled by a medium temperature baghouse fabric filter system. The stack height is 70 feet, with an exit diameter of 5.0 feet and an exit temperature of 210 °F. The **design** volumetric flow rate is 40,000 acfm; and, the **corresponding** dry standard flow rate is 30,892 dscfm.

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Cement Storage Silos #1 & #2 A-Side Discharge System with Baghouse. This emissions unit activity is the unloading of cement from the two storage silos. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 50 feet, with an exit diameter of 1.5 feet and an exit temperature of 160 °F. The **design** volumetric flow rate is 3,200 acfm; and, the **corresponding** dry standard flow rate is 2,671 dscfm.

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Cement Storage Silos #1 & #2 with Baghouse. These emissions units are an activity of cement being pneumatically transferred to two storage silos from the finish mill. The PM emissions are controlled by a single low temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 2.0 feet and an exit temperature of 180 °F. The **design** volumetric flow rate is 7,400 acfm; and, the **corresponding** dry standard flow rate is 5,983 dscfm.

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Iron Ore Bin with Baghouse. This emissions unit is an activity of iron ore being stored in a bin. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 51 feet, with an exit diameter of 1.5 feet and an exit temperature of 180 °F. The design volumetric flow rate is 3,600 acfm; and, the corresponding dry standard flow rate is 2,911 dscfm.

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Finish Mill Feed Belt with Baghouse. This emissions unit is an activity of transferring clinker, gypsum or limestone to the finish mill. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 29 feet, with an exit diameter of 2.0 feet and an exit temperature of 85 °F. The design volumetric flow rate is 9,000 acfm; and, the corresponding dry standard flow rate is 8,820 dscfm.

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Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse. This emissions unit was used for the unloading of lime. Now, this emissions unit is used for the unloading of cement from a storage silo. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 50 feet, with an exit diameter of 1.5 feet and an exit temperature of 160 °F. The design volumetric flow rate is 10,000 acfm.

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Cement Storage Silo #3 with Baghouse. This emissions unit was used for the storage of lime. Now, this emissions unit is an activity of cement being pneumatically transferred to a silo from the finish mill. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 2.0 feet and an exit temperature of 180 °F. The design volumetric flow rate is 5,300 acfm.

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Cement Storage Silo #4 and Truck Loadout System with Baghouse. This emissions unit is an activity of cement being pneumatically transferred to the silo from the finish mill and cement loaded into trucks. The PM emissions are controlled by a single low temperature baghouse fabric filter system. The stack height is 75 feet, with an exit diameter of 0.8 feet and an exit temperature of 77 °F. The design volumetric flow rate is 860 acfm; and, the corresponding dry standard flow rate is 829 dscfm.

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Cement Storage Silo and Railcar Loadout System with Baghouses. This emissions unit is an activity of cement being pneumatically transferred to the railcar silo from cement storage silos #1, #2, and #3. The PM emissions are controlled by two low temperature baghouse fabric filter systems. One stack height is 80 feet, with an exit diameter of 1.5 feet and an exit temperature of 77 °F, design volumetric flow rate is 6,000 acfm and, the corresponding dry standard flow rate is 5,899 dscfm; and, the other (Z-18) stack height is 10 feet, with an exit diameter of 0.5 feet and an exit temperature of 77 °F, design volumetric flow rate is 500 acfm and, the corresponding dry standard flow rate is 490 dscfm.

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Clinker Receiving/Handling System. This emissions unit is an integrated system for handling clinker that includes a below-grade truck unloading hopper, a belt conveyor, and a deep-bucket conveyor. The fugitive particulate matter emissions generated from the transfer of clinker from the receiving hopper to the belt conveyor shall be controlled by the use of a Johnston-Marsh or equivalent dust suppression system. This emissions unit is regulated under Rules 62-212.400 and 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD-FL-091) and Best Available Control Technology, respectively; Power Plant Siting: PA 82-17; 40 CFR 60, Subpart F, Standards of Performance for Portland Cement Plants, adopted in Rule 62-204.800, F.A.C.; and, 40 CFR 63, Subpart LLL, National Emissions Standards for Hazardous Air Pollutants from Portland Cement Manufacturing Industry, adopted in Rule 62-204.800, F.A.C., by June 10, 2002.

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Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I with Baghouse. The cement plant is designed for 83 TPH tons/day of cement clinker product. Electrical power and heat is supplied by a 150 MW power plant (Brooksville Power Plant). The cement kiln I, clinker cooler I and raw mill share a common baghouse fabric filter system (for particulate matter emissions control) and stack with the power plant. Waste heat from the kiln is used to provide heat to the raw mill and the kiln preheater, which is used to drive off moisture from the materials used for making clinker. The movement of raw materials, recycled materials, and product will be through enclosed transfer systems. All gas streams from the various transfer systems will vent through a baghouse system into the ambient air. The existing site is zoned for mining, so limestone and clay used in the production of cement will be supplied on site.

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STATEMENT OF BASIS

Florida Crushed Stone Company
DRAFT Title V Permit Renewal No.: 0530021-011-AV
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The kiln is allowed to fire bituminous coal, distillate and residual fuel oil, on-specification used oil, and shredded and whole tires. Continuous monitors are operated for opacity, NO_x, SO₂, and O₂; in addition, a flow monitor is required; and, the opacity and SO₂ CEMs are used for compliance purposes. The stack height is 300 feet, with an exit diameter of 16.0 feet and an exit temperature of 220° F. The design volumetric flow rate is 577,700 acfm; and, the corresponding dry standard flow rate is 376,796 dscfm. This emissions unit activity is regulated under Rules 62-212.400 and 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD-FL-091, -091A, B, C & D) and Best Available Control Technology, respectively; Power Plant Siting: PA 82-17 and PA 82-17(A thru K); 40 CFR 60, Subpart F, Standards of Performance for Portland Cement Plants, adopted in Rule 62-204.800, F.A.C.; and, 40 CFR 63, Subpart LLL, National Emissions Standards for Hazardous Air Pollutants from Portland Cement Manufacturing Industry, adopted in Rule 62-204.800, F.A.C., by June 10, 2002.

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Brooksville Power Plant:

The following emissions units are regulated under Rule 62-297.620(4), F.A.C., Exceptions and Approval of Alternate Procedures and Requirements; Rules 62-212.400 and 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD-FL-090 and PSD-FL-091) and Best Available Control Technology (BACT), respectively; and, Power Plant Siting: PA 82-17 and PA 82-17(A thru K).

Limestone Rock Bin with Baghouse. This emissions unit is a storage bin for limestone rock. The particulate matter (PM) emissions from the materials being stored are controlled by a low temperature baghouse fabric filter system. The stack height is 100 feet, with an exit diameter of 2.5 feet and an exit temperature of 70 °F. The design volumetric flow rate is 10,500 acfm.

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Contaminated Fly Ash & Filter Dust Bin with Baghouse. This emissions unit is a storage bin for contaminated fly ash and filtered dust. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 1.5 feet and an exit temperature of 180 °F. The design volumetric flow rate is 11,000 acfm.

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Limestone Screening System with Baghouse. This emissions unit is the operation of the limestone screening system to size limestone. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 30 feet, with an exit diameter of 2.0 feet and an exit temperature of 150 °F. The design volumetric flow rate is 3,000 acfm.

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Limestone Fines Storage Bin with Baghouse. This emissions unit is the operation of a storage bin for dried limestone fines for the cement plant. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 150 feet, with an exit diameter of 3.5 feet and an exit temperature of 100 °F. The design volumetric flow rate is 19,000 acfm.

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Lime Dust Storage Bin with Baghouse. This emissions unit is a storage bin for lime dust. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 100 feet, with an exit diameter of 2.5 feet and an exit temperature of 120 °F. The design volumetric flow rate is 6,300 acfm.

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Power Plant Boiler with Dry Limestone Injection Scrubbing followed with a Baghouse System: This emissions unit is a net delivered 150 MW fossil fuel fired boiler with a 320 foot stack. The primary fuel burned is coal, with new distillate No. 2 fuel oil used for startup. Control activity includes dry limestone injection scrubbing followed with a fabric filter baghouse system. The exit diameter is 16 feet and the exit temperature is 300 °F. The volumetric flow rate is 840,000 acfm. This emissions unit is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD-FL-090 and PSD-FL-090D); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT); and, Power Plant Siting: PA 82-17 and PA 82-17(A thru K).

STATEMENT OF BASIS

Florida Crushed Stone Company

DRAFT Title V Permit Renewal No.: 0530021-011-AV

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Brooksville Cement Plant I/Power Plant:

The following emissions unit/activity is regulated under Rule 62-210.300, F.A.C., Permits Required; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD-FL-090); and, Power Plant Siting: PA 82-17 and PA 82-17E.

Coal Receiving, Handling and Transfer Activities (fugitives). This emissions unit is an activity of receiving, storage, and transferring/conveying 568,300 tons per year of coal to the Florida Crushed Stone Company's cement plant I/power plant (C/P plants). The coal will be received in unit trains and will be bottom-dumped from moving rail cars through an open elevated trestle to a coal receiving area. From this area, the coal will be moved to a storage area by a bulldozer with the storage pile being shaped and compacted during the transfer. The resulting coal storage area will cover approximately 7.8 acres and will be approximately 10 feet high. The coal storage area will have a capacity of approximately 55,000 tons. The coal will be recovered from the coal storage pile by a rubber tired front-end loader and transferred to a receiving hopper. The maximum daily coal transfer rate from the storage pile to the C/P plants receiving system will be 1,740 tons per day. From the receiving hopper, the coal will be transferred by covered conveyor belt to a screening system and then to one of five coal bins that will supply the C/P plants. Water sprays or chemical wetting agents and stabilizers will be used at the coal receiving area, the coal storage area, and the coal transfer system to control fugitive particulate matter emissions and minimize visible emissions. All conveyors and conveyor transport points will be enclosed to minimize fugitive particulate matter emissions (except those directly associated with the coal stacker/reclaimer or emergency stockout stacker/reclaimer or emergency stockout). The inactive coal storage piles will be shaped, compacted and oriented to minimize wind erosion. Water sprays or chemical wetting agents and stabilizers will be applied to the storage piles, handling equipment, etc. during dry periods and as necessary to all coal handling facilities to minimize visible emissions.

Based on the Title V permit applications received April 18, 2005, this facility is a major source of hazardous air pollutants (HAPs).

Miscellaneous:

1. For clarity, a "Permitting Note" was added to Specific Condition F.10., Dioxins/Furans., as follows:
{Permitting Note: This emissions limitation applies when the existing in-line kiln/raw mill are operating alone and when operating along with any other emissions unit(s).}

2. Because a federally enforceable requirement imposes that a SO₂ and an opacity continuous emissions monitoring system in Specific Condition F.32. be calibrated and maintained per the appropriate regulations cited, then the redundancy of Specific Condition F.33. is not needed; and, the original Specific Condition came from an air operation permit, No. AO27-231888A. Therefore, the following is changed:

FROM:

F.33. The owner or operator shall install, calibrate, maintain, and operate a continuous emissions monitoring system to measure SO₂ emissions from the cement kiln and clinker cooler control device stack. The calibration of the continuous monitoring system shall be in accordance with 40 CFR 60, Appendix B, Performance Specification 2. [Rule 62-4.070(3), F.A.C.; 40 CFR 60, Appendix B; and, AO27-231888A]

TO:

F.33. Reserved.

3. The text related to the "Delegation of Authority" located at Specific Conditions B.29., D.29. and F.44., will be deleted from the permit because it is not considered to be an applicable requirement of the facility and appropriate in the permit. Therefore, each Specific Condition will be replaced with "Reserved".

Florida Crushed Stone Company
Brooksville Cement and Power Plants
Facility ID No.: 0530021
Hernando County

Title V Air Operation Permit Renewal
DRAFT Permit No.: 0530021-011-AV

Permitting Authority:

State of Florida
Department of Environmental Protection
Division of Air Resources Management
Bureau of Air Regulation
Title V Section
Mail Station #5505
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 850/488-0114
Fax: 850/922-6979

Compliance Authority:

State of Florida
Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6458

Florida Crushed Stone Company
Brooksville Cement and Power Plants

Title V Air Operation Permit Renewal
DRAFT Permit No.: 0530021-011-AV

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Permittee:

Florida Crushed Stone Company
Post Office Box 1508
Brooksville, Florida 34605-1508

DRAFT Permit No.: 0530021-011-AV**Facility ID No.:** 0530021**SIC Nos.:** 32; 3241**Project:** Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit and to incorporate the terms and conditions established in an Air Construction Permit, No. 0530021-010-AC. This facility is located off Cobb Road 2 miles Northwest of Brooksville, Brooksville, Hernando County. UTM Coordinates are: Zone 17; 360.00 km East; and, 3162.50 km North; Latitude: 28° 35' 00" North; and, Longitude: 82° 25' 53" West.

The permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-212 and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Appendix I-I, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-5, TITLE V CONDITIONS (version dated 03/28/05)
APPENDIX SS-1, STACK SAMPLING FACILITIES (dated 10/07/96)
TABLE 297.310-1, CALIBRATION SCHEDULE (dated 10/07/96)
Attachment "40 CFR 60, Subpart A"
Attachment "40 CFR 63, Subpart A"
FIGURE 1 - SUMMARY REPORT - GASEOUS AND OPACITY EXCESS EMISSIONS
AND MONITORING SYSTEMS PERFORMANCE REPORT (40 CFR 60, July 1996)
Alternate Sampling Procedure: ASP Number 97-B-01
Attachment O & M (Operation & Maintenance Plan)

Permit Effective Date: (Day 55 of EPA's review clock of PROPOSED permit)**Permit Renewal Application Due Date:** (180 days before Expiration Date)**Permit Expiration Date:** (5 yrs from "Effective Date")

Michael G. Cooke, Director
Division of Air Resource Management

MGC/jk/bm

Section I. Facility Information.

Subsection A. Facility Description.

The facility is an integrated facility that includes a Portland cement manufacturing plant, a power plant, and a coal yard. The power boiler is a coal fired unit that is allowed to generate a net delivered 150 MW. The cement kiln I, in-line kiln/raw mill and clinker cooler I share a common baghouse fabric filter system (for particulate matter emissions control) and stack with the power plant; and, dry limestone injection is used to control SO₂ emissions from the power boiler, which is then collected in the common baghouse fabric filter system. Waste heat from the kiln is used to provide heat to the raw mill and the kiln preheater, which is used to drive off moisture from the materials used for making clinker. All of the materials handling activities are controlled by fabric filter baghouse control systems, except for the Clinker Receiving/Handling System and the coal yard activities. For the Clinker Receiving/Handling System, the fugitive particulate matter emissions generated from the transfer of clinker from the receiving hopper to the belt conveyor are controlled using a ~~Johnston-Marsh or equivalent dust suppression system;~~ and, other types of particulate matter control may be required depending on how the system is actually operated. Water sprays or chemical wetting agents and stabilizers will be used at the coal receiving area, the coal storage area, and the coal transfer system to control fugitive particulate matter emissions and minimize visible emissions. All fly ash handling systems (including transfer and silo storage) will be totally enclosed and vented (including pneumatic system exhaust) through fabric filters.

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Based on the Title V permit applications received April 18, 2005, this facility is a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No./Facility ID No.	Brief Description
Brooksville Cement Plant I	
-001/D-75	Filter Dust Bin (was Pre-Mix Bin) with Baghouse
-002/D-67	Fly Ash/Equilibrium Catalyst Storage Silo with Baghouse
-004/F-14	Raw Meal Transfer with Baghouse
-006/G-12 (A & B)	Two Blend Silos with Baghouse
-007/H-15	Kiln Feed Surge Bin (was Kiln Feed Bin) with Baghouse
-008/S-04	Clinker Receiving/Handling System
-009/K-07 & L-03	Clinker Cooler Discharge with Baghouse
-010/L-06 to L-05 & L-07	Clinker Storage Silos with Baghouse
-011/L-08	Gypsum and Limestone Bins (was Clinker Silo) with Baghouse
-012/M-08	Silo Discharge with Baghouse
-013/N-13	Finish Mill with Baghouse
-014/Q-17	Cement Storage Silos #1 & #2 A-Side Discharge System with Baghouse
-015/Q-15	Cement Storage Silos #1 & #2 with Baghouse
-017/D-63	Iron Ore Bin with Baghouse
-019/M-05	Finish Mill Feed Belt with Baghouse
-020/	Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I with Baghouse
-021/Q-18	Cement Storage Silos #1, #2, & #3 B-Side Discharge System with Baghouse
-022/Z-15	Cement Storage Silo #3 with Baghouse
-023/	Cement Storage Silo #4 and Truck Loadout Sys. with Baghouse
-024/Z-18	Cement Storage Silo and Railcar Loadout Sys. with Baghouses

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Brooksville Power Plant	
-035/D-38	Limestone Rock Bin Baghouse
-036/D-31	Contaminated Fly Ash & Filter Dust Bin
-037/D-39	Limestone Screening System
-038/D-13	Limestone Fines Storage Bin
-039/Z-31	Lime Dust Storage Bin
-018	Power Plant Boiler
Brooksville Cement Plant I/Power Plant	
-042	Coal Receiving, Handling and Transfer System (fugitives)

Insignificant Emissions Units and/or Activities. For the Insignificant Emissions Units and/or Activities, see Appendix I-1 (attached).

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1: Abbreviations, Acronyms, Citations, and Identification Numbers.

Appendix H-1: Permit History/ID Number Changes.

These documents are on file with the permitting authority:

Mr. Dick Arbes letter dated October 13, 1997, regarding the intent to eliminate the requirement of ambient monitoring.

Initial Title V Permit, Project No. 0530021-002-AV, issued October 18, 2000.

Title V Permit Revision, Project No. 0530021-007-AV, issued July 9, 2003.

Air Construction Permit, Project No. 0530021-010-AC, issued May 16, 2005.

Application for Title V Permit Renewal received April 18, 2005.

Mr. Michael G. Cooke's letter dated June 27, 2005, to Dr. John Koogler.

"Waiver of 90-day Time Limit for Issuance of Permit" received July 12, 2005, via the fax.

E-mail received from Ms. Fawn Bergen, P.E., on August 10, 2005.

Conditions of Certification: PA 82-17K, modified September 14, 2005.

"Waiver of 90-day Time Limit for Issuance of Permit" received September 26, 2005, via the fax. Letter with documents received from Ms. Fawn Bergen, P.E., on October 21, 2005.

E-mail with attachment received from Ms. Fawn Bergen, P.E., on November 30, 2005.

"Waiver of 90-day Time Limit for Issuance of Permit" received November 30, 2005, via the fax.

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-5, TITLE V CONDITIONS, is a part of this permit.

{Permitting Note: APPENDIX TV-5, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. No person shall cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

[Rule 62-296.320(2), F.A.C.; and, AC27-199744]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard.

Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.

[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. Prevention of Accidental Releases (Section 112(r) of CAA).

a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 1515
Lanham-Seabrook, MD 20703-1515
Telephone: 301/429-5018

and,

b. The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

5. Unregulated Emissions Units and/or Activities. Appendix U-1, List of Unregulated Emissions Units and/or Activities, is a part of this permit. There are none listed at this time.

[Rule 62-213.440(1), F.A.C.]

6. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.

[Rules 62-213.440(1), 62-213.430(6) and 62-4.040(1)(b), F.A.C.]

7. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

{Permitting note: The Department has not required or deemed anything necessary to date.}
[Rule 62-296.320(1)(a), F.A.C.]

8. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility during operations include: chemical or water application of dust suppressants on roads and construction sites, landscaping and planting of vegetation.

[Rule 62-296.320(4)(c)2., F.A.C.; and, AC27-118672, -118673, -118675, -118677, -118678, -118683, -118685, -118686, -118687, -118688, -118689, -118690, -189081, -199744 & -228926]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.

[Rule 62-213.440, F.A.C.]

10. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Southwest District office at the following address:

Department of Environmental Protection
Southwest District Office
3804 Coconut Palm Drive
Tampa, Florida 33619-8218
Telephone: 813/744-6100
Fax: 813/744-6458

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: 404/562-9155
Fax: 404/562-9163

12. The facility ID of 0530021 is the consolidated ID of 0530021, 0530005 and 0530032, and will be used for all future permitting activities.

[Rule 62-4.070(3), F.A.C.]

13. PM₁₀ Ambient Monitoring. The permittee shall install and operate four (4) ambient monitoring devices for particulate matter (PM₁₀) in accordance with EPA quality assurance procedures and reference methods in 40 CFR 53. The monitoring devices shall be operated at three locations (one location will have two monitors for quality assurance purposes) approved by Hernando County. The frequency of operation of the monitors shall be every six (6) days. The ambient monitoring program shall begin December 31, 2000.

[Applicant requested July 6, 2000, via facsimile]

14. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-5, TITLE V CONDITIONS)}

15. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
[Rule 62-213.420(4), F.A.C.]

Subsection A. Reserved.

Subsection B. This section addresses the following emissions units.

Brooksville Cement Plant 1	
E.U. ID No./Facility ID No.	Brief Description
-001/D-75	Filter Dust Bin with Baghouse
-002/D-67	Fly Ash/Equilibrium Catalyst Bin with Baghouse
-004/F-14	Raw Meal Transfer with Baghouse
-006/G-12 (A & B)	Two Blend Silos with Baghouse
-007/H-15	Kiln Feed Surge Bin with Baghouse
-009/K-07 & L-03	Clinker Cooler Discharge with Baghouse
-010/L-06 to L-05 & L-07	Clinker Storage Silos with Baghouse
-011/L-08	Gypsum and Limestone Bins with Baghouse
-012/M-08	Silo Discharge with Baghouse
-013/N-13	Finish Mill with Baghouse
-014/Q-17	Cement Storage Silos #1 & #2 A-Side Discharge System with Baghouse
-015/Q-15	Cement Storage Silos #1 & #2 with Baghouse
-017/D-63	Iron Ore Bin with Baghouse
-019/M-05	Finish Mill Feed Belt with Baghouse
-021/Q-18	Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse
-022/Z-15	Cement Storage Silo #3 with Baghouse
-023/	Cement Storage Silo #4 and Truck Loadout System with Baghouse
-024/Z-18	Cement Storage Silo and Railcar Loadout System with Baghouses

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Filter Dust Bin with Baghouse. This emissions unit is a storage bin for fines (dust). The particulate matter (PM) emissions from the materials being transferred are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The design volumetric flow rate is 6,800 acfm; and the corresponding dry standard flow rate is 6,686 dscfm.

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Fly Ash/Equilibrium Catalyst Bin with Baghouse. This emissions unit is a storage bin for fly ash/equilibrium catalyst. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The design volumetric flow rate is 4,200 acfm; and the corresponding dry standard flow rate is 4,130 dscfm.

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Raw Meal Transfer with Baghouse. This emissions unit is an activity of raw meal being transferred from the storage bins to the raw mill. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 70 feet, with an exit diameter of 1.0 feet and an exit temperature of 180 °F. The design volumetric flow rate is 1,200 acfm; and the corresponding dry standard flow rate is 970 dscfm.

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Two Blend Storage Silos with Baghouse. This emissions unit is two storage silos for the raw meal being transferred from the raw mill. The PM emissions are controlled by a single low temperature baghouse fabric filter system. The stack height is 240 feet, with an exit diameter of 3.5 feet and an exit temperature of 180 °F. The design volumetric flow rate is 17,000 acfm; and the corresponding dry standard flow rate is 13,745 dscfm.

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Kiln Feed Surge Bin with Baghouse. This emissions unit is an activity of materials being pre-heated in the pre-heater and transferred to the kiln. The PM emissions are controlled by a medium temperature

baghouse fabric filter system. The stack height is 50 feet, with an exit diameter of 2.0 feet and an exit temperature of 200 °F. The design volumetric flow rate is 6,000 acfm; and the corresponding dry standard flow rate is 4,704 dscfm.

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Clinker Cooler Discharge with Baghouse. This emissions unit is an activity of clinker transfer from the clinker cooler to the deep bucket conveyor (L-03), which conveys clinker to clinker storage. The PM emissions are controlled by a medium temperature baghouse fabric filter system. The stack height is 10 feet, with an exit diameter of 1.0 feet and an exit temperature of 250 °F. The design volumetric flow rate is 5,100 acfm; and the corresponding dry standard flow rate is 3,717 dscfm.

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Clinker Storage Silos with Baghouse. This emissions unit is an activity of clinker being transferred to the finish mill. The PM emissions are controlled by a single medium temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 1.5 feet and an exit temperature of 200 °F. The design volumetric flow rate is 2,600 acfm; and the corresponding dry standard flow rate is 2,038 dscfm.

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Gypsum and Limestone Bins with Baghouse. This emissions unit is an activity of gypsum and limestone being stored and transferred. The PM emissions are controlled by a single medium temperature baghouse fabric filter system. The stack height is 135 feet, with an exit diameter of 1.5 feet and an exit temperature of 200 °F. The design volumetric flow rate is 5,000 acfm; and the corresponding dry standard flow rate is 3,920 dscfm.

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Silo Discharge with Baghouse. This emissions unit is an activity of clinker, gypsum or limestone being transferred from their silos. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 135 feet, with an exit diameter of 2.5 feet and an exit temperature of 100 °F. The design volumetric flow rate is 9,000 acfm; and the corresponding dry standard flow rate is 8,316 dscfm.

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Finish Mill with Baghouse. This emissions unit combines clinker, limestone and gypsum to form cement. The PM emissions are controlled by a medium temperature baghouse fabric filter system. The stack height is 70 feet, with an exit diameter of 5.0 feet and an exit temperature of 210 °F. The design volumetric flow rate is 40,000 acfm; and the corresponding dry standard flow rate is 30,892 dscfm.

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Cement Storage Silos #1 & #2 A-Side Discharge System with Baghouse. This emissions unit activity is the unloading of cement from the three storage silos. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 50 feet, with an exit diameter of 1.5 feet and an exit temperature of 160 °F. The design volumetric flow rate is 3,200 acfm; and the corresponding dry standard flow rate is 2,671 dscfm.

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Cement Storage Silos #1 & #2 with Baghouse. This emissions unit is an activity of cement being pneumatically transferred to two storage silos from the finish mill. The PM emissions are controlled by a single low temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 2.0 feet and an exit temperature of 180 °F. The design volumetric flow rate is 7,400 acfm; and the corresponding dry standard flow rate is 5,983 dscfm.

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Iron Ore Bin with Baghouse. This emissions unit is an activity of iron ore being stored in a bin. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 51 feet, with an exit diameter of 1.5 feet and an exit temperature of 180 °F. The design volumetric flow rate is 3,600 acfm; and the corresponding dry standard flow rate is 2,911 dscfm.

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Finish Mill Feed Belt with Baghouse. This emissions unit is an activity of transferring clinker, gypsum or limestone to the finish mill. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 29 feet, with an exit diameter of 2.0 feet and an exit temperature of 85 °F. The design volumetric flow rate is 9,000 acfm; and the corresponding dry standard flow rate is 8,820 dscfm.

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Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse. This emissions unit was used for the unloading of lime. Now, this emissions unit is used for the unloading of cement from a storage silo. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 50 feet, with an exit diameter of 1.5 feet and an exit temperature of 160 °F. The design volumetric flow rate is 10,000 acfm.

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Cement Storage Silo #3 with Baghouse. This emissions unit was used for the storage of lime. Now, this emissions unit is an activity of cement being pneumatically transferred to a silo from the finish mill. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 2.0 feet and an exit temperature of 180 °F. The design volumetric flow rate is 5,300 acfm.

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Cement Storage Silo #4 and Truck Loadout System with Baghouse. This emissions unit is an activity of cement being pneumatically transferred to the silo from the finish mill and cement loaded into trucks. The PM emissions are controlled by a single low temperature baghouse fabric filter system. The stack height is 75 feet, with an exit diameter of 0.8 feet and an exit temperature of 77 °F. The design volumetric flow rate is 860 acfm; and, the maximum dry standard flow rate is 829 dscfm.

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Cement Storage Silo and Railcar Loadout System with Baghouse. This emissions unit is an activity of cement being pneumatically transferred to the railcar silo from the cement storage silos #1, #2, and #3. The PM emissions are controlled by two low temperature baghouse fabric filter systems. One stack height is 80 feet, with an exit diameter of 1.5 feet and an exit temperature of 77 °F, design volumetric flow rate is 6,000 acfm and, the corresponding dry standard flow rate is 5,899 dscfm; and, the other (Z-18) stack height is 10 feet, with an exit diameter of 0.5 feet and an exit temperature of 77 °F, design volumetric flow rate is 500 acfm and, the corresponding dry standard flow rate is 490 dscfm.

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{Permitting note: These emissions units are regulated under Rule 62-297.620(4), F.A.C., Exceptions and Approval of Alternate Procedures and Requirements; Rules 62-212.400 and 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD-FL-091) and Best Available Control Technology, respectively; Power Plant Siting: PA 82-17; and, 40 CFR 63, Subpart LLL, National Emissions Standards for Hazardous Air Pollutants from Portland Cement Manufacturing Industry, adopted in Rule 62-204.800, F.A.C. (effective June 10, 2002).}

The following Specific Conditions apply to the emissions unit(s) listed above:

General

B.0. Reserved.

B.1. Exemption From New Source Performance Standards. Except as provided in paragraphs 40 CFR 63.1356(a)(1) and (a)(2), any affected source subject to the provisions of 40 CFR 63, Subpart LLL is exempted from any otherwise applicable new source performance standard contained in 40 CFR Part 60, Subpart F.
 [Rule 62-204.800, F.A.C.; and, 40 CFR 63.1356]

B.2. The emissions units are subject to **Attachment "40 CFR 63, Subpart A"** and it is attached.

Essential Potential to Emit (PTE) Parameters

B.3. Permitted Capacity. The maximum process/transfer/throughput rates are:

E.U. ID No.	Brief Description	Maximum Rate
-001	Filter Dust Bin with Baghouse	450 tons/hour (TPH)
-002	Fly Ash/Equilibrium Catalyst Bin with Baghouse	25 TPH
-004	Raw Meal Transfer with Baghouse	138 TPH
-006	Two Blend Silos with Baghouse	138 TPH
-007	Kiln Feed Surge Bin with Baghouse	138 TPH
-009	Clinker Cooler Discharge with Baghouse	83 TPH
-010	Clinker Storage Silos with Baghouse	83 TPH
-011	Gypsum and Limestone Bins with Baghouse	75 TPH
-012	Silo Discharge with Baghouse	122 TPH
-013	Finish Mill with Baghouse	125 TPH; 876,000 TPY
-014	Cement Storage Silos #1 & #2 A-Side Discharge System with Baghouse	300 TPH
-015	Cement Storage Silos #1 & #2 with Baghouse	125 TPH each 876,000 TPY each
-017	Iron Ore Bin with Baghouse	100 TPH
-019	Finish Mill Feed Belt with Baghouse	120 TPH
-021	Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse	300 TPH
-022	Cement Storage Silo #3 with Baghouse	125 TPH; 876,000 TPY
-023	Cement Storage Silo #4 and Truck Loadout System with Baghouse	47 TPH: silo 390 TPH: trucks
-024	Cement Storage Silo and Railcar Loadout System with Baghouses	30 TPH: silo 100 TPH: railcars

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[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; 0530021-003-AO; 0530021-004-AO; 0530021-006-AC/0530021-007-AV]

B.4. Hours of Operation.

- a. The emissions units listed in Specific Condition B.3. are allowed to operate continuously, i.e., 8,760 hours/year, except for the Cement Storage Silos #1, #2, and #3 B-Side Discharge System, the Cement Storage Silo #3, and the Cement Storage Silo #4 and Truck Loadout System.
- b. The Cement Storage Silos #1, #2, and #3 B-Side Discharge System, the Cement Storage Silo #3, and the Cement Storage Silo #4 and Truck Loadout System are allowed to operate 7,884 hours/year. [AC27-091432, -091433, -118672, -118673, -118675, -118677, -118678, -118683, -118685, -118686, -118687, -118688, -118689, -118690, -189081, -199744 & -228926]

B.5. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition B.14. [Rule 62-297.310(2), F.A.C.]

B.6. Method of Operation. The emissions units either process or transfer materials used in the production of Portland cement. The fly ash handling system (including transfer and silo storage) will be totally enclosed and vented (including pneumatic system exhaust) through fabric filters. [Rule 62-213.410, F.A.C.; PA 82-17 and PA 82-17E; and, PSD-FL-090 and 091]

Emission Limitations

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition B.7. is based on the specified averaging time of the applicable test method.}

B.7. Particulate Matter. The maximum allowable particulate matter emissions are:

E.U. ID No.	Brief Description	Maximum Allowable Limits
-001	Filter Dust Bin with Baghouse	0.015 gr/acf; 0.7 lb/hr; 3.07 TPY
-002	Fly Ash/Equilibrium Catalyst Bin with Baghouse	0.015 gr/acf; 0.4 lb/hr; 1.75 TPY
-004	Raw Meal Transfer with Baghouse	0.015 gr/acf; 0.2 lb/hr; 0.88 TPY
-006	Two Blend Silos with Baghouse	0.015 gr/acf; 2.2 lbs/hr; 9.64 TPY
-007	Kiln Feed Surge Bin with Baghouse	0.015 gr/acf; 0.8 lb/hr; 3.50 TPY
-009	Clinker Cooler Discharge with Baghouse	0.015 gr/acf; 0.66 lb/hr; 2.9 TPY
-010	Clinker Storage Silos with Baghouse	0.015 gr/acf; 0.3 lb/hr; 1.31 TPY
-011	Gypsum and Limestone Bins with Baghouse	0.015 gr/acf; 0.6 lb/hr; 2.63 TPY
-012	Silo Discharge with Baghouse	0.015 gr/acf; 1.2 lbs/hr; 5.26 TPY
-013	Finish Mill with Baghouse	0.015 gr/acf; 5.1 lbs/hr; 22.34 TPY
-014	Cement Storage Silos #1 & #2 A-Side Discharge Sys. with Baghouse	0.015 gr/acf; 0.4 lb/hr; 1.75 TPY
-015	Cement Storage Silos #1 & #2 with Baghouse	0.015 gr/acf; 1.0 lb/hr; 4.38 TPY
-017	Iron Ore Bin with Baghouse	0.015 gr/acf; 0.5 lb/hr; 2.19 TPY
-019	Finish Mill Feed Belt with Baghouse	1.16 lbs/hr; 5.08 tons/rolling 12-months
-021	Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse	0.015 gr/acf; 1.29 lbs/hr; 5.1 TPY
-022	Cement Storage Silo #3 with Baghouse	0.015 gr/acf; 0.68 lb/hr; 2.7 TPY
-023	Cement Storage Silo #4 and Truck Loadout Sys. with Baghouse	0.015 gr/acf; 0.11 lb/hr; 0.44 TPY
-024	Cement Storage Silo and Railcar Loadout Sys. with Baghouses	0.02 gr/acf

Deleted: to Deep Bucket Conveyor
 Deleted: & Finish Mill Storage Silo

[PSD-FL-090 & PSD-FL-091 and BACT; PA 82-17; and, AC27-091432, -091433, -118672, -118673, -118675, -118677, -118678, -118683, -118685, -118686, -118687, -118688, -118689, -118690, -189081, -199744 & -228926; and, 0530021-006-AC]

B.8. Visible Emissions. Visible emissions shall not exceed 5 percent opacity, since each emissions unit's potential particulate matter emissions are less than 100 TPY and is equipped with a baghouse control system. As long as the visible emissions do not exceed 5 percent opacity, compliance is assumed for the particulate matter limitations established in Specific Condition **B.7**. See Specific Condition **B.12**.

If the Department has reason to believe that the particulate matter weight emissions standard in Specific Condition **B.7** is not being met, it shall require that compliance be demonstrated by the test method specified in Specific Condition **B.11**.

[PSD-FL-090 & PSD-FL-091 and BACT; PA 82-17; AC27-091432, -091433, -118672, -118673, -118675, -118677, -118678, -118683, -118685, -118686, -118687, -118688, -118689, -118690, -189081, -199744 & -228926; 0530021-007-AV; and, Rule 62-297.620(4), F.A.C.]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

B.9. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.10. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

B.11. Particulate Matter. Particulate matter emissions compliance testing shall be demonstrated using EPA Method 5 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions **B.7** and **B.8**.

[Rules 62-204.800 and 62-297.401, F.A.C.]

B.12. Visible Emissions. Visible emissions compliance testing shall be demonstrated annually using EPA Method 9 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions **B.8** and **B.18**.

[Rules 62-204.800 and 62-297.401, F.A.C.; and, 40 CFR 63.1349(b)(2)]

B.13. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic

mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

B.14. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

B.15. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

B.16. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

B.17. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

B.18. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate.

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

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; or, 100 tons per year or more of any other regulated air pollutant; and,

c. Each NESHAP pollutant, if there is an applicable emission standard.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved; and, 40 CFR 63.1349(c)]

B.19. The owner or operator of an affected emissions unit subject to 40 CFR 63, Subpart LLL, shall demonstrate initial compliance with the emission limits of 40 CFR 63.1347 and 40 CFR 63.1348 (See Specific Condition **B.8.**) using the test methods and procedures in paragraph 40 CFR 63.1349(b) and 40 CFR 63.7. Performance test results shall be documented in complete test reports that contain the information required by paragraphs 40 CFR 63.1349(a)(1) through (a)(10), as well as all other relevant information. The plan to be followed during testing shall be made available to the Administrator prior to testing, if requested.

(1) A brief description of the process and the air pollution control system;

- (2) Sampling location description(s);
- (3) A description of sampling and analytical procedures and any modifications to standard procedures;
- (4) Test results;
- (5) Quality assurance procedures and results;
- (6) Records of operating conditions during the test, preparation of standards, and calibration procedures;
- (7) Raw data sheets for field sampling and field and laboratory analyses;
- (8) Documentation of calculations;
- (9) All data recorded and used to establish parameters for compliance monitoring; and
- (10) Any other information required by the test method.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1349(a)]

Monitoring of Operations

B.20. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

B.21.(a) The owner or operator of each Portland cement plant shall prepare for each affected source subject to the provisions of 40 CFR 63, Subpart LLL, a written operations and maintenance plan.

Appendix O & M (Operation & Maintenance Plan) (attached) is a part of this permit and this subsection. The plan shall be submitted to the Administrator for review and approval as part of the application for a 40 CFR Part 70 permit and shall include the following information:

(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emission limits and operating limits of 40 CFR 63.1347 and 40 CFR 63.1348 (See Specific Condition **B.8.**);

(2) Corrective actions to be taken when required by paragraph 40 CFR 63.1350(e); and

(3) Procedures to be used to periodically monitor affected sources subject to opacity standards under 40 CFR 63.1348 (See Specific Condition **B.8.**). Such procedures must include the provisions of paragraphs 40 CFR 63.1350(a)(4)(i) through (a)(4)(iv).

(i) The owner or operator must conduct a monthly 1-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A, 40 CFR Part 60. The test must be conducted while the affected source is in operation.

(ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iii) If no visible emissions are observed during the semi-annual test for any affected source, the owner or operator may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the owner or operator

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(3) Not Applicable

must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iv) If visible emissions are observed during any Method 22 test, the owner or operator must conduct a 6-minute test of opacity in accordance with Method 9 of Appendix A, 40 CFR Part 60. The Method 9 test must begin within one hour of any observation of visible emissions.

(v) The requirement to conduct Method 22 visible emissions monitoring under this paragraph shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.

(b) Failure to comply with any provision of the operations and maintenance plan developed in accordance with paragraph 40 CFR 63.1350(a) shall be a violation of the standard.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1350(a)(1), (2) & (4) and (b)]

B.22. Finish Mill: Opacity Monitoring. The owner or operator of a finish mill shall monitor opacity by conducting daily visual emissions observations of the mill sweep and air separator PMCDs (PM control devices) of this affected source, in accordance with the procedures of Method 22 of Appendix A, 40 CFR Part 60. The Method 22 test shall be conducted while the affected source is operating at the representative performance conditions. The duration of the Method 22 test shall be six (6) minutes. If visible emissions are observed during any Method 22 visible emissions test, the owner or operator must:

- (1) Initiate, within one-hour, the corrective actions specified in the site specific operating and maintenance plan developed in accordance with paragraphs 40 CFR 63.1350(a)(1) and (a)(2); and
- (2) Within 24 hours of the end of the Method 22 test in which visible emissions were observed, conduct a follow-up Method 22 test of each stack from which visible emissions were observed during the previous Method 22 test. If visible emissions are observed during the follow-up Method 22 test, conduct a visual opacity test of each stack from which visible emissions were observed during the follow-up Method 22 test in accordance with Method 9 of Appendix A, 40 CFR Part 60. The duration of the Method 9 test shall be thirty minutes.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1350(e)]

B.23. The owner or operator of an affected source subject to a limitation on opacity under 40 CFR 63.1348 (See Specific Condition **B.8.**) shall monitor opacity in accordance with the operation and maintenance plan developed in accordance with paragraph 40 CFR 63.1350(a). See Specific Condition

B.21.

[Rule 62-206.800, F.A.C.; and, 40 CFR 63.1350(j)]

Notification, Recordkeeping and Reporting Requirements

B.24. Notification requirements.

(a) The notification provisions of 40 CFR 63, Subpart A, are contained in Appendix 40 CFR 63, Subpart A (attached), and are applicable. If any State requires a notice that contains all of the information required in a notification listed in 40 CFR 63.1353, the owner or operator may send the Administrator a copy of the notice sent to the State to satisfy the requirements of 40 CFR 63.1353 for that notification.

(b) Each owner or operator subject to the requirements of 40 CFR 63, Subpart LLL shall comply with the notification requirements in 40 CFR 63.9 as follows:

- (1) Initial notifications as required by 40 CFR 63.9(b) through (d). For the purposes of 40 CFR 63, Subpart LLL, a Title V or 40 CFR Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b), provided the same information is contained in the permit application as required by 40 CFR 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under 40 CFR Part 70 and has received delegation of authority from the EPA. Permit applications shall be submitted by the same due dates as those specified for the initial notification.
- (2) Notification of performance tests, as required by 40 CFR 63.7 and 63.9(e).
- (3) Notification of opacity and visible emission observations required by 40 CFR 63.1349 in accordance with 40 CFR 63.6(h)(5) and 63.9(f).
- (4) Reserved.
- (5) Notification of compliance status, as required by 40 CFR 63.9(h).

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1353(a) and (b)(1), (2), (3) & (5)]

B.25. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

B.26. Reporting Requirements.

(a) The reporting provisions of 40 CFR 63, Subpart A, are contained in Appendix 40 CFR 63, Subpart A (attached), and are applicable. If any State requires a report that contains all of the information required in a report listed in 40 CFR 63.1354, the owner or operator may send the Administrator a copy of the report sent to the State to satisfy the requirements of 40 CFR 63.1354 for that report.

(b) The owner or operator of an affected source shall comply with the reporting requirements specified in 40 CFR 63.10 of the general provisions of 40 CFR Part 63, Subpart A, as follows:

- (1) As required by 40 CFR 63.10(d)(2), the owner or operator shall report the results of performance tests as part of the notification of compliance status.
- (2) As required by 40 CFR 63.10(d)(3), the owner or operator of an affected source shall report the opacity results from tests required by 40 CFR 63.1349.
- (3) As required by 40 CFR 63.10(d)(4), the owner or operator of an affected source who is required to submit progress reports as a condition of receiving an extension of compliance under 40 CFR 63.6(i) shall submit such reports by the dates specified in the written extension of compliance.
- (4) As required by 40 CFR 63.10(d)(5), if actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the owner or operator shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports; and

(5) Any time an action taken by an owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the owner or operator shall make an immediate report of the actions taken for that event within 2 working days, by telephone call or facsimile (FAX) transmission. The immediate report shall be followed by a letter, certified by the owner or operator or other responsible official, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1354(a) and (b)(1) thru (5)]

B.27. Recordkeeping Requirements.

(a) The owner or operator shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355 recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent five years of data shall be retained on site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.

(b) The owner or operator shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (b)(3); and

- (1) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9;
- (2) All records of applicability determination, including supporting analyses; and
- (3) If the owner or operator has been granted a waiver under 40 CFR 63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements.

[Rules 62-204.800 and 62-213.440, F.A.C.; and, 40 CFR 63.1355(a) and (b)]

B.28. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.
2. The facility at which the emissions unit is located.
3. The owner or operator of the emissions unit.
4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.

9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous

B.29. Reserved.

Subsection C. Reserved.

Subsection D. This section addresses the following emissions unit.

Brooksville Cement Plant I	
E.U. ID No./Facility ID No.	Brief Description
-008/S-04	Clinker Receiving/Handling System

This emissions unit is an integrated system for handling clinker that includes a below-grade truck unloading hopper, a belt conveyor, and a deep-bucket conveyor. The fugitive particulate matter emissions generated from the transfer of clinker from the receiving hopper to the belt conveyor shall be controlled by the use of ~~a Johnston-Marsh or equivalent dust suppressant system.~~

{Permitting note: This emissions unit is regulated under Rules 62-212.400 and 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD-FL-091) and Best Available Control Technology, respectively; Power Plant Siting: PA 82-17; and, 40 CFR 63, Subpart LLL, National Emissions Standards for Hazardous Air Pollutants from Portland Cement Manufacturing Industry, adopted in Rule 62-204.800, F.A.C. (effective June 10, 2002);

Comment [FB1]: FCS will install a Johnston-Marsh or equivalent dust suppressant system to control PM emissions.

Deleted: of some type of wetting agent

Deleted: ; and, other types of particulate matter control may be required depending on how the system is actually operated

The following Specific Conditions apply to the emissions unit listed above:

General

D.0.

D.1. Exemption From New Source Performance Standards. Except as provided in paragraphs 40 CFR 63.1356(a)(1) and (a)(2), any affected source subject to the provisions of 40 CFR 63, Subpart LLL is exempted from any otherwise applicable new source performance standard contained in 40 CFR Part 60, Subpart F.
 [Rule 62-204.800, F.A.C.; and, 40 CFR 63.1356]

D.2. The emissions unit is subject to **Attachment "40 CFR 63, Subpart A"** and it is attached.

Essential Potential to Emit (PTE) Parameters

D.3. Permitted Capacity. The maximum process/transfer/throughput rate of clinker is 100 tons/hour.
 [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and, 0530021-002-AV]

D.4. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
 [AC27-118680]

D.5. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition **D.15**.
 [Rule 62-297.310(2), F.A.C.]

Comment [FB2]: Since FCS will install a Johnston-Marsh or equivalent dust suppressant system to control PM emissions, this requirement is not necessary.

Deleted: Due to the very intermittent use of this operation, the Department's Southwest District office, specifically the Compliance Section, shall be notified upon any anticipated use of this operation in order to be able to witness the actual operation for compliance purposes.*
 [Rule 62-4.070(3), F.A.C.]

Deleted: ;

D.6. Method of Operation. The emissions unit receives clinker from trucks from a below-grade receiving hopper and transfers the clinker using a belt conveyor and a deep-bucket conveyor system. [Rule 62-213.410, F.A.C.; and, AC27-118680]

Emission Limitations

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition D.7. is based on the specified averaging time of the applicable test method.}

D.7. Particulate Matter. The allowable particulate matter emissions from the clinker handling system shall not exceed 0.7 lb/hr. [AC27-118680]

D.8. Visible Emissions. Visible emissions shall not exceed 10 percent opacity. Compliance with the particulate matter emissions limit in Specific Condition D.7. shall be assumed if the visible emissions limit in this condition is met.

However, if visible emissions exceed 10 percent opacity, then the owner or operator shall install hoods, ducts, and air pollution control equipment that will reduce the particulate matter emissions to the standard listed in Specific Condition D.7. Also, see Specific Condition D.30. [AC27-118680; and, 40 CFR 63.1348]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS or NESHAP provision.}

D.9. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

D.10. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition D.11. is based on the specified averaging time of the applicable test method.}

D.11. Particulate Matter. Particulate matter emissions compliance shall be demonstrated using EPA Method 5 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions D.7. and D.8. [Rules 62-204.800 and 62-297.401, F.A.C.]

D.12. Visible Emissions. Visible emissions compliance shall be demonstrated annually using DEP Method 9 pursuant to Chapter 62-297, F.A.C. See Specific Conditions D.8., D.13. and D.19. [AC27-118680; Rule 62-297.401, F.A.C.; and, 40 CFR 63.1349(b)(2)]

D.13. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
 - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
 - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.

[Rule 62-297.401, F.A.C.]

D.14. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

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D.15. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

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D.16. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.
[Rule 62-297.310(3), F.A.C.]

D.17. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

(e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.
[Rule 62-297.310(4), F.A.C.]

D.18. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

D.19. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

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(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate.

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

- a. Visible emissions, if there is an applicable standard;
- b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; or, 100 tons per year or more of any other regulated air pollutant; and,
- c. Each NESHAP pollutant, if there is an applicable emission standard.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a baghouse or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

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[Rule 62-297.310(7), F.A.C.; SIP approved; and, 40 CFR 63.1349(c)]

D.20. The owner or operator of an affected source subject to 40 CFR 63, Subpart LLL, shall demonstrate initial compliance with the emission limits of 40 CFR 63.1348 (See Specific Condition **D.8.**) using the test methods and procedures in paragraph 40 CFR 63.1349(b) and 40 CFR 63.7. Performance test results shall be documented in complete test reports that contain the information required by paragraphs 40 CFR 63.1349(a)(1) through (a)(10), as well as all other relevant information. The plan to be followed during testing shall be made available to the Administrator prior to testing, if requested.

- (1) A brief description of the process and the air pollution control system;
- (2) Sampling location description(s);
- (3) A description of sampling and analytical procedures and any modifications to standard procedures;
- (4) Test results;
- (5) Quality assurance procedures and results;
- (6) Records of operating conditions during the test, preparation of standards, and calibration procedures;
- (7) Raw data sheets for field sampling and field and laboratory analyses;
- (8) Documentation of calculations;
- (9) All data recorded and used to establish parameters for compliance monitoring; and
- (10) Any other information required by the test method.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1349(a)]

Monitoring of Operations

D.21. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

D.22.(a) The owner or operator of each Portland cement plant shall prepare for each affected source subject to the provisions of 40 CFR 63, Subpart LLL, a written operations and maintenance plan. Appendix O & M (Operation & Maintenance Plan) (attached) is a part of this permit and this subsection. The plan shall be submitted to the Administrator for review and approval as part of the application for a 40 CFR Part 70 permit and shall include the following information:

(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emission limits and operating limits of 40 CFR 63.1348 (See Specific Condition **D.8.**); and

(4) Procedures to be used to periodically monitor affected sources subject to opacity standards under 40 CFR 63.1348 (See Specific Condition **D.8.**). Such procedures must include the provisions of paragraphs 40 CFR 63.1350(a)(4)(i) through (a)(4)(iv).

(i) The owner or operator must conduct a monthly 1-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A, 40 CFR Part 60. The test must be conducted while the affected source is in operation.

(ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iii) If no visible emissions are observed during the semi-annual test for any affected source, the owner or operator may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iv) If visible emissions are observed during any Method 22 test, the owner or operator must conduct a 6-minute test of opacity in accordance with Method 9 of Appendix A, 40 CFR Part 60. The Method 9 test must begin within one hour of any observation of visible emissions.

(v) The requirement to conduct Method 22 visible emissions monitoring under this paragraph shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.

(b) Failure to comply with any provision of the operations and maintenance plan developed in accordance with paragraph 40 CFR 63.1350(a) shall be a violation of the standard.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1350(a)(1) & (4) and (b)]

D.23. The owner or operator of an affected source subject to a limitation on opacity under 40 CFR 63.1348 (See Specific Condition **D.8.**) shall monitor opacity in accordance with the operation and maintenance plan developed in accordance with paragraph 40 CFR 63.1350(a). See Specific Condition **D.22.**

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1350(j)]

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Notification, Recordkeeping and Reporting Requirements

D.24. Notification requirements.

(a) The notification provisions of 40 CFR 63, Subpart A, are contained in Appendix 40 CFR 63, Subpart A (attached), and are applicable. If any State requires a notice that contains all of the information required in a notification listed in 40 CFR 63.1353, the owner or operator may send the Administrator a copy of the notice sent to the State to satisfy the requirements of 40 CFR 63.1353 for that notification.

(b) Each owner or operator subject to the requirements of 40 CFR 63, Subpart LLL shall comply with the notification requirements in 40 CFR 63.9 as follows:

(1) Initial notifications as required by 40 CFR 63.9(b) through (d). For the purposes of 40 CFR 63, Subpart LLL, a Title V or 40 CFR Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b), provided the same information is contained in the permit application as required by 40 CFR 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under 40 CFR Part 70 and has received delegation of authority from the EPA. Permit applications shall be submitted by the same due dates as those specified for the initial notification.

(2) Notification of performance tests, as required by 40 CFR 63.7 and 63.9(e).

(3) Notification of opacity and visible emission observations required by 40 CFR 63.1349 in accordance with 40 CFR 63.6(h)(5) and 63.9(f).

(4) Reserved.

(5) Notification of compliance status, as required by 40 CFR 63.9(h).

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1353(a) and (b)(1), (2), (3) & (5)]

D.25. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.

[Rule 62-210.700(6), F.A.C.]

D.26. Reporting requirements.

(a) The reporting provisions of 40 CFR 63, Subpart A, are contained in Appendix 40 CFR 63, Subpart A (attached), and are applicable. If any State requires a report that contains all of the information required in a report listed in 40 CFR 63.1354, the owner or operator may send the Administrator a copy of the report sent to the State to satisfy the requirements of 40 CFR 63.1354 for that report.

(b) The owner or operator of an affected source shall comply with the reporting requirements specified in 40 CFR 63.10 of the general provisions of 40 CFR Part 63, Subpart A, as follows:

(1) As required by 40 CFR 63.10(d)(2), the owner or operator shall report the results of performance tests as part of the notification of compliance status.

(2) As required by 40 CFR 63.10(d)(3), the owner or operator of an affected source shall report the opacity results from tests required by 40 CFR 63.1349.

(3) As required by 40 CFR 63.10(d)(4), the owner or operator of an affected source who is required to submit progress reports as a condition of receiving an extension of compliance under 40 CFR 63.6(i) shall submit such reports by the dates specified in the written extension of compliance.

(4) As required by 40 CFR 63.10(d)(5), if actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the owner or operator shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports; and

(5) Any time an action taken by an owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the owner or operator shall make an immediate report of the actions taken for that event within 2 working days, by telephone call or facsimile (FAX) transmission. The immediate report shall be followed by a letter, certified by the owner or operator or other responsible official, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1354(a) and (b)(1) thru (5)]

D.27. Recordkeeping Requirements.

(a) The owner or operator shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355 recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent **five** years of data shall be retained on site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.

(b) The owner or operator shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (b)(3); and

(1) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9;

(2) All records of applicability determination, including supporting analyses; and

(3) If the owner or operator has been granted a waiver under 40 CFR 63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements.

[Rules 62-204.800 and 62-213.440, F.A.C.; and, 40 CFR 63.1355(a) and (b)]

D.28. Test Reports.

(a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.

(b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

(c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

1. The type, location, and designation of the emissions unit tested.

2. The facility at which the emissions unit is located.

3. The owner or operator of the emissions unit.

4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.

5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.

6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
8. The date, starting time and duration of each sampling run.
9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
10. The number of points sampled and configuration and location of the sampling plane.
11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
12. The type, manufacturer and configuration of the sampling equipment used.
13. Data related to the required calibration of the test equipment.
14. Data on the identification, processing and weights of all filters used.
15. Data on the types and amounts of any chemical solutions used.
16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Miscellaneous

D.29. Reserved.

D.30. A water spray system shall be installed and used as necessary to control fugitive dust emissions during clinker unloading operations from train cars or trucks to the receiving hopper.

[AC27-118680]

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Subsection E. Reserved.

Subsection F. This section addresses the following emissions units.

Brooksville Cement Plant I	
E.U. ID No./Facility ID No.	Brief Description
-020/	Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I with Baghouse

The cement plant is designed for **83 TPH** of cement clinker product. Electrical power and heat is supplied by a 150 MW power plant (Brooksville Power Plant). The cement kiln I, in-line kiln/raw mill and clinker cooler I share a common baghouse fabric filter system (for particulate matter emissions control) and stack with the power plant. Waste heat from the kiln is used to provide heat to the raw mill and the kiln preheater, which is used to drive off moisture from the materials used for making clinker. The movement of raw materials, recycled materials, and product will be through enclosed transfer systems. All gas streams from the various transfer systems will vent through a single baghouse system into the ambient air. The existing site is zoned for mining, so limestone and clay used in the production of cement will be supplied on site. The kiln is allowed to fire bituminous coal, distillate and residual fuel oil, on-specification used oil, and shredded and whole tires. Continuous monitors are operated for opacity, NO_x, SO₂, and O₂. The stack height is 300 feet, with an exit diameter of 16.0 feet and an exit temperature of 220 °F. The **design** volumetric flow rate is 577,700 acfm; and the **corresponding** dry standard flow rate is 376,796 dscfm.

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{Permitting note: This emissions unit activity is regulated under Rules 62-212.400 and 62-212.400(6), F.A.C., Prevention of Significant Deterioration (PSD-FL-091, -091A, B, C & D) and BACT, respectively; Power Plant Siting: PA 82-17 and PA 82-17(A thru K); and, Maximum Available Control Technology (MACT), 40 CFR 63, Subpart LLL, National Emissions Standards for Hazardous Air Pollutants from Portland Cement Manufacturing Industry, adopted in Rule 62-204.800, F.A.C. (effective June 10, 2002);

The following Specific Conditions apply to the emissions unit(s) listed above:

General

F.0. Performance Testing. The owner or operator shall notify the Department prior to initiating any significant change in the feed or fuel used in the most recent compliant performance test for D/F or PM. For purposes of this condition, significant means any of the following: a physical or chemical change in the feed or fuel; the use of a raw material not previously used; a change in the LOI of the fly ash; a change between non-beneficiated fly ash and beneficiated fly ash. Based on the information provided, the Department will promptly determine if performance testing pursuant to 40 CFR 63.1349 will be required for the new feed or fuel. A significant change shall not include switching to a feed/fuel mix for which the permittee already tested in compliance with the dioxin/furan and PM emission limits. [62-4.070(3), F.A.C.]

F.1. Exemption From New Source Performance Standards. Except as provided in paragraphs 40 CFR 63.1356(a)(1) and (a)(2), any affected source subject to the provisions of 40 CFR 63, Subpart LLL is exempted from any otherwise applicable new source performance standard contained in 40 CFR Part 60, Subpart F. [Rule 62-204.800, F.A.C.; and, 40 CFR 63.1356]

F.2. Attachments.

- a. The emissions units are subject to **Attachment "40 CFR 63, Subpart A"** and it is attached.
- b. The emissions units are subject to the **Appendix O & M (Operation & Maintenance Plan)** and it is attached.

Essential Potential to Emit (PTE) Parameters

F.3. Permitted Capacity.

- a. For the cement kiln I, the maximum dry feed rate to the kiln is 127.0 tons/hour (138.0 tons/hour feed rate to the preheater).
- b. For the clinker cooler I, the maximum clinker production rate is 83.0 tons/hour.
- c. For the in-line kiln/raw mill, the maximum processing rate is 138 tons/hour (dry basis).
[AC27-61016/PSD-FL-091; and, Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

F.4. Hours of Operation.

- a. The emissions units are allowed to operate continuously, i.e., 8,760 hours/year.
- b. Shredded and whole tire (TDF) utilization shall not exceed 8,300 hours/year.
[AC27-61016/PSD-FL-091; AC27-118674/PSD-FL-091A & B; and, AC27-222095/PSD-FL-091C]

F.5. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition **F.22.**

[Rule 62-297.310(2); F.A.C.]

F.6. Methods of Operation.

a. Fuels.

1. The only fuels allowed to be fired are coal, No. 2 distillate fuel oil, residual fuel oil, "on-specification" used oil, and TDF.
2. The maximum coal consumption in the cement kiln I is 10.3 tons/hour.
3. The new No. 2 fuel oil shall be used for the cement kiln I's startup/preheating operation.
3. "On-specification" used oil is allowed to be fired as a blend with purchased fuel oil as a startup fuel only. The maximum on-specification used oil in the final storage tank blend of on-specification used oil and purchased oil shall not exceed 15%, by volume.
4. The cement kiln I's maximum utilization/firing rate of TDF shall not exceed 15.0 percent of the total Btu heat input, or 1.33 tons/hour. The TDF may be introduced at the base of the preheater (i.e., kiln I's inlet). The firing of the TDF shall not commence or be conducted unless the kiln I has reached an operating temperature, which shall be measured at the cement kiln I's inlet, of at least 1400° F for one hour and the oxygen level in the kiln, as measured at the cement plant's induced draft fan, is at least 3 percent (1-hour average).

[Rule 62-213.410, F.A.C.; AC27-61016/PSD-FL-091; AC27-118674/PSD-FL-091A & B; and, AC27-222095/PSD-FL-091C & D]

b. Limitations on Operation to Minimize Dioxin/Furan Formation.

1. For kiln I to operate during times the power plant is not operating, the raw mill down time shall not exceed 10 consecutive hours (i.e. If the raw mill is down for 10 consecutive hours or more, the facility will cease operating kiln I.). ~~Power plant startup is defined as the period beginning with the initiation of fuel firing, either oil or coal, and continuing for 72 consecutive hours.~~
2. The 10-hour limitation on the raw mill down set forth in Specific Condition **F.6.b.1.**, above, does not apply during startup of the cement plant.

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3. The requirements of Specific Condition F.6.b.1., above, may be amended if the permittee provides the Department with other reasonable assurances, acceptable to the Department, that dioxin/furan emission limits will be met during power plant down or in startup mode with the raw mill down.

[0530021-010-AC]

Emission Standards and Operating Limitations

{Permitting Note: Unless otherwise specified, the averaging time for Specific Conditions F.7. and F.10. are based on the specified averaging time of the applicable test method.}

F.7. Emission Limits.

a. Cement Plant I: Particulate Matter (PM), Sulfur Dioxide (SO₂) and Nitrogen Oxides (NO_x). Based on a maximum ~~preheater feed rate of 138 TPH~~ to the kiln I and when only the cement plant I is in operation, the allowable pollutant emissions from the cement kiln I and/or clinker cooler I (from the main baghouse stack) shall not exceed the following:

Pollutant	Maximum Emission Limits		Maximum Allowable Emission Limits	
	lb/ton of kiln feed		lbs/hr	tons/yr
PM (kiln I or in-line kiln/ raw mill)	0.30		37.1	162
PM (clinker cooler I)	0.10		12.4	54
PM (combined total: kiln I or in-line kiln/raw mill and clinker cooler I)	0.40		49.5	216
SO ₂	0.6		50.0	219
NO _x	2.9		359.0	1572

Comment [FB3]: Preheater feed rate is parameter measured and this rate is limited by condition F.3 and corresponds to the kiln feed rate of 127.0
~~Deleted: dry feed rate of 127.0~~
~~Deleted: tons/hr~~

[AC27-61016/PSD-FL-091 and BACT; AC27-118674; 40 CFR 63.1343(a) and (b)(1); and, 40 CFR 63.1345(a)(1)]

b. Combined Cement Plant I and Power Plant Boiler: PM/PM₁₀. PM/PM₁₀ emissions from the combined cement plant I and power plant boiler shall not exceed 0.0135 pound per MMBtu heat input (25.0 pounds per hour at 1850 MMBtu/hr heat input) plus 0.3 pound from cement kiln I and 0.1 pound from clinker cooler I per ton of kiln I's feed (dry basis), averaging time per 40 CFR 60.46.
 [PA 82-17 and PA 82-17E; PSD-FL-090 and PSD-FL-090D; and, BACT]

c. Combined Cement Plant I and Power Plant Boiler: SO₂. SO₂ emissions from the combined cement plant I and power plant boiler shall not exceed 1.2 pounds per MMBtu heat input, maximum two hour average, and 781 pounds per hour, maximum three hour average.
 [PA 82-17 and PA 82-17E; PSD-FL-090 and PSD-FL-090D; and, BACT]

d. Combined Cement Plant I and Power Plant Boiler: NO_x. NO_x emissions from the combined cement plant I and power plant boiler shall not exceed 0.7 pound per MMBtu heat input plus 2.9 pounds per ton of kiln I's feed (dry basis), averaging time per Chapter 62-297, F.A.C., not to exceed 1205 pounds per hour.
 [PA 82-17 and PA 82-17E; PSD-FL-090 and PSD-FL-090D; and, BACT]

e. Combined Cement Plant I and Power Plant Boiler: Total Fluorides. Total fluoride emissions from the combined cement plant I and power plant boiler shall not exceed 0.7 pound per hour.
 [PSD-FL-090]

f. Combined Cement Plant I and Power Plant Boiler: Sulfuric Acid Mist. Sulfuric acid mist emissions from the combined cement plant I and power plant boiler shall not exceed 1.7 pounds per hour.
[PSD-FL-090]

g. Combined Cement Plant I and Power Plant Boiler: Beryllium. **Reserved**.
[PSD-FL-090(A) & 091(E); and, 0530021-006-AC]

h. Combined Cement Plant I and Power Plant Boiler: Mercury. Mercury emissions from the combined cement plant I and power plant boiler shall not exceed 0.03 pound per hour.
[PSD-FL-090]

F.8. Visible Emissions.

a. Cement Plant I: Visible Emissions. Visible emissions from the cement kiln I, clinker cooler I, or in-line kiln/raw mill shall not exceed 10 percent opacity.
[AC27-61016/PSD-FL-091 and BACT; AC27-118674; and, 40 CFR 63.1345(a)(2)]

b. Cement Plant I: Visible Emissions. For purposes of the MACT at 40 CFR 63, Subpart LLL, visible emissions from the cement kiln I or in-line kiln/raw mill shall not exceed 20 percent opacity.
[40 CFR 63.1343(b)(2)]

c. Combined Cement Plant I and Power Plant Boiler. Visible emissions from the combined cement plant I and power plant boiler shall not exceed 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.
[PA 82-17; PSD-FL-090; and, BACT]

F.9. Sulfur Dioxide - Sulfur Content. The maximum sulfur content of virgin fuel oil and/or the blend of on-specification used oil and purchased fuel oil is 1.5%, by weight, for the purpose of preheating the cement kiln I.
[AC27-222095/PSD-FL-091D]

F.10. Dioxins/Furans.

a. 0.20 ng per dscm (8.7×10^{-11} gr per dscf)(TEQ) corrected to seven percent oxygen; or
b. No owner or operator of an existing in-line kiln/raw mill shall cause to be discharged into the atmosphere from these affected emissions units, any gases which contain dioxins/furans in excess of 0.40 ng/dscm (1.7×10^{-10} gr/dscf) (TEQ) corrected to seven percent oxygen, when the average of the performance test run average temperatures at the inlet to the particulate control device is 204 °C (400 °F) or less.

{Permitting Note: This emissions limitation applies when the existing in-line kiln/raw mill are operating alone and when operating along with any other emissions unit(s).}

[Rules 62-4.070(3) and 62-204.800, F.A.C.; and, 40 CFR 63.1343(a) and (b)(3)(i) & (ii)]

F.11. "On-Specification" Used Oil. The burning of "on-specification" used oil is allowed at this facility in accordance with all other conditions of this permit and the following additional conditions:

a. Only "on-specification" used oil generated at the Florida Crushed Stone Company's Gregg Mine and the Cement Plant and Power Plant Complex can be blended with the purchased fuel oil, which is to be used only as a startup fuel for preheating the cement kiln I. "On-specification" used oil is

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defined as each used oil delivery that meets the 40 CFR 279 (Standards for the Management of Used Oil) specifications listed below. Used oil that does not meet all of the following specifications is considered "off-specification" oil and shall not be fired.

<u>Constituent/Property</u>	<u>Allowable Level</u>
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	140 °F minimum

* As determined by approved methods specified in EPA Publication SW-846 (Test Methods for Evaluating Solid Waste, Physical/Chemical Methods).

b. Permittee agrees that the used oil to be blended and burned at this facility shall not be a hazardous waste as defined in Rule 62-210.200, F.A.C., or 40 CFR Part 261, and will not include fuels or blended fuels consisting in whole or part of hazardous waste or which include mixtures of any solid waste generated from the treatment, storage, or disposal of hazardous waste, and such burning shall be in compliance with Section 403.769(3), F.S.

[AC27-222095/PSD-FL-091D; and, 40 CFR 279.11]

F.12. Operating Limits for Kilns and In-line Kiln/Raw Mills.

(a) The owner or operator of a kiln subject to a D/F emission limitation under 40 CFR 63.1343 must operate the kiln such that the temperature of the gas at the inlet to the kiln particulate matter control device (PMCD) does not exceed the applicable temperature limit specified in paragraph 40 CFR 63.1344(b). The owner or operator of an in-line kiln/raw mill subject to a D/F emission limitation under 40 CFR 63.1343 must operate the in-line kiln/raw mill, such that,

(1) When the raw mill of the in-line kiln/raw mill is operating, the applicable temperature limit for the main in-line kiln/raw mill exhaust, specified in paragraph 40 CFR 63.1344(b) and established during the performance test when the raw mill was operating is not exceeded.

(2) When the raw mill of the in-line kiln/raw mill is not operating, the applicable temperature limit for the main in-line kiln/raw mill exhaust, specified in paragraph 40 CFR 63.1344(b) and established during the performance test when the raw mill was not operating, is not exceeded.

(b) The temperature limit for affected sources meeting the limits of paragraph 40 CFR 63.1344(a) or paragraphs 40 CFR 63.1344(a)(1) and (a)(2) is determined in accordance with 40 CFR 63.1349(b)(3)(iv). [Rule 62-204.800, F.A.C.; and, 40 CFR 63.1344(a)(1) & (2) and (b)]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

F.13. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

F.14. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.
[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

F.15. PM, NO_x, SO₂, and Visible Emissions. The permittee shall annually conduct:

- a. Performance tests on the main stack for PM, NO_x, SO₂, and visible emissions:
- (1) during normal operations when the power plant and cement plant I are operating in combination; and,
 - (2) at or near maximum production when the cement plant I is operating alone.

[PSD-FL-090 and PSD-FL-091; PA 82-17E; and, Rule 62-297.310(7), F.A.C.]

F.16. Initial and Subsequent Performance Testing.

(a) The owner or operator of an affected emissions unit subject to 40 CFR 63, Subpart LLL, shall demonstrate initial compliance with the emission limits of 40 CFR 63.1343 and ~~40~~ CFR 63.1345 (See Specific Conditions **F.7.**, **F.8.** and **F.10.**) using the test methods and procedures in paragraph 40 CFR 63.1349(b) and 40 CFR 63.7. Performance test results shall be documented in complete test reports that contain the information required by paragraphs 40 CFR 63.1349(a)(1) through (a)(10), as well as all other relevant information. The plan to be followed during testing shall be made available to the Administrator prior to testing, if requested.

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- (1) A brief description of the process and the air pollution control system;
- (2) Sampling location description(s);
- (3) A description of sampling and analytical procedures and any modifications to standard procedures;
- (4) Test results;
- (5) Quality assurance procedures and results;
- (6) Records of operating conditions during the test, preparation of standards, and calibration procedures;
- (7) Raw data sheets for field sampling and field and laboratory analyses;
- (8) Documentation of calculations;
- (9) All data recorded and used to establish parameters for compliance monitoring; and
- (10) Any other information required by the test method.

(b) Performance tests to demonstrate initial compliance with 40 CFR 63, Subpart LLL, shall be conducted as specified in paragraphs 40 CFR 63.1349(b)(1) through (b)(3).

(1) The owner or operator of a kiln subject to limitations on particulate matter emissions shall demonstrate initial compliance by conducting a performance test as specified in paragraphs 40 CFR 63.1349(b)(1)(i) through (b)(1)(iii). The owner or operator of an in-line kiln/raw mill subject to limitations on particulate matter emissions shall demonstrate initial compliance by conducting separate performance tests as specified in paragraphs 40 CFR 63.1349(b)(1)(i) through (b)(1)(iii) while the raw mill of the in-line kiln/raw mill is under normal operating conditions and while the raw mill of the in-line kiln/raw mill is not operating. The owner or operator of a clinker cooler subject to limitations on particulate matter emissions shall demonstrate initial compliance by conducting a performance test as specified in paragraphs 40 CFR 63.1349(b)(1)(i) through (b)(1)(iii). The opacity exhibited during the period of the Method 5 of Appendix A, 40 CFR Part 60 performance tests required by paragraph 40 CFR 63.1349(b)(1)(i) shall be determined as required in paragraph 40 CFR 63.1349(b)(1)(v).

(i) EPA Method 5 of Appendix A, 40 CFR Part 60, shall be used to determine PM emissions.

Each performance test shall consist of three separate runs under the conditions that exist when

the affected source is operating at the representative performance conditions in accordance with 40 CFR 63.7(e) (See Specific Condition **F.24.**). Each run shall be conducted for at least one hour, and the minimum sample volume shall be 0.85 dscm (30 dscf). The average of the three runs shall be used to determine compliance. A determination of the particulate matter collected in the impingers ("back half") of the Method 5 particulate sampling train is not required to demonstrate initial compliance with the PM standards of 40 CFR 63, Subpart LLL. However this shall not preclude the permitting authority from requiring a determination of the "back half" for other purposes.

(ii) Suitable methods shall be used to determine the kiln or in-line kiln/raw mill feed rate, except for fuels, for each run.

(iii) The emission rate, E, of PM shall be computed for each run using Equation 1:

$$E = (c_s Q_{sd}) / P \quad \text{(Equation 1)}$$

Where: E = emission rate of particulate matter, kg/Mg of kiln feed.

c_s = concentration of PM, kg/dscm.

Q_{sd} = volumetric flow rate of effluent gas, dscm/hr.

P = total kiln feed (dry basis), Mg/hr.

(v) Except as provided in paragraph 40 CFR 63.1349(b)(1)(vi) the opacity exhibited during the period of the Method 5 performance tests required by paragraph 40 CFR 63.1349(b)(1)(i) shall be determined through the use of a continuous opacity monitor (COM). The maximum six-minute average opacity during the three Method 5 test runs shall be determined during each Method 5 test run, and used to demonstrate initial compliance with the applicable opacity limits of 40 CFR 63.1343(b)(2) or 40 CFR 63.1345(a)(2). See Specific Conditions **F.8.** and **F.15.**

(3) The owner or operator of an affected source subject to limitations on D/F emissions shall demonstrate initial compliance with the D/F emission limit by conducting a performance test using Method 23 of Appendix A, 40 CFR Part 60. The owner or operator of an in-line kiln/raw mill shall demonstrate initial compliance by conducting separate performance tests while the raw mill of the in-line kiln/raw mill is under normal operating conditions and while the raw mill of the in-line kiln/raw mill is not operating (See Specific Condition **F.22.**).

(i) Each performance test shall consist of three separate runs; each run shall be conducted under the conditions that exist when the affected source is operating at the representative performance conditions in accordance with 40 CFR 63.7(e) (See Specific Condition **F.24.**). The duration of each run shall be at least three hours and the sample volume for each run shall be at least 2.5 dscm (90 dscf). The concentration shall be determined for each run and the arithmetic average of the concentrations measured for the three runs shall be calculated and used to determine compliance.

(ii) The temperature at the inlet to the kiln or in-line kiln/raw mill PMCD, must be continuously recorded during the period of the Method 23 test, and the continuous temperature record(s) must be included in the performance test report.

(iii) One-minute average temperatures must be calculated for each minute of each run of the test.

(iv) The run average temperature must be calculated for each run, and the average of the run average temperatures must be determined and included in the performance test report and will determine the applicable temperature limit in accordance with 40 CFR 63.1344(b).

(c) Except as provided in paragraph 40 CFR 63.1349(e), performance tests required under paragraphs 40 CFR 63.1349(b)(1) shall be repeated every five years. See Specific Conditions **F.15.** and **F.26.**

(d) Performance tests required under paragraph 40 CFR 63.1349(b)(3) shall be repeated every 30 months.

- (e) (1) If a source plans to undertake a change in operations that may adversely affect compliance with an applicable D/F standard under this subpart, the source must conduct a performance test and establish new temperature limit(s) as specified in paragraph 40 CFR 63.1349(b)(3).
- (2) If a source plans to undertake a change in operations that may adversely affect compliance with an applicable PM standard under 40 CFR 63.1343, the source must conduct a performance test as specified in paragraph 40 CFR 63.1349(b)(1).
- (3) In preparation for and while conducting a performance test required in paragraph 40 CFR 63.1349(e)(1), a source may operate under the planned operational change conditions for a period not to exceed 360 hours, provided that the conditions in paragraphs 40 CFR 63.1349(e)(3)(i) through (iv) are met. The source shall submit temperature and other monitoring data that are recorded during the pretest operations.
- (i) The source must provide the Administrator written notice at least 60 days prior to undertaking an operational change that may adversely affect compliance with an applicable standard under this subpart, or as soon as practicable where 60 days advance notice is not feasible. Notice provided under this paragraph shall include a description of the planned change, the emissions standards that may be affected by the change, and a schedule for completion of the performance test required under paragraph 40 CFR 63.1349(e)(1), including when the planned operational change period would begin.
- (ii) The performance test results must be documented in a test report according to paragraph 40 CFR 63.1349(a).
- (iii) A test plan must be made available to the Administrator prior to testing, if requested.
- (iv) The performance test must be conducted, and it must be completed within 360 hours after the planned operational change period begins.

[Rules 62-204.800 and 62-297.310(7)(a)4., F.A.C.; and, 40 CFR 63.1349(a); (b)(1)(i), (ii), (iii) & (v); (b)(3)(i), (ii), (iii) & (iv); (c); (d); and, (e)]

F.17. Visible Emissions.

(a) Visible emissions performance testing shall be demonstrated using EPA Method 9 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions **F.8.**, **F.15.** and **F.26.**
[Rules 62-204.800, 62-297.310(7) & 62-297.401, F.A.C.; and, 40 CFR 63.1349]

F.18. Sulfur Dioxide. Compliance with the sulfur dioxide emission limits in Specific Condition **F.7.** shall be demonstrated using EPA Method 6 **or 6C** pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions **F.15.** and **F.26.**
[Rules 62-297.310(7) & 62-297.401, F.A.C.; AC27-61016/PSD-FL-091; and, AC27-118674]

F.19. Nitrogen Oxide. Compliance with the nitrogen oxide emission limits in Specific Condition **F.7.** shall be demonstrated using EPA Method 7 **or 7E** pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions **F.15.** and **F.26.**
[Rules 62-297.310(7) & 62-297.401, F.A.C.; AC27-61016/PSD-FL-091; and, AC27-118674]

F.20. On-specification Used Oil. Fuel analysis shall be in accordance with 40 CFR 266.43(b)(1) & (6). A sample shall be taken from the outlet of the blend tank on the first working day (i.e., Monday - Friday; exceptions: holidays) of each month, if any used oil was placed in the blend tank the previous month; or, the sample can be taken directly from the used oil mobile collection tank after final collection and prior to the time of initial transfer; but, that sampling frequency shall be no less than quarterly and the sampling methodology shall have been established with the Department and Hernando County prior to

sampling. Upon taking a sample, the sample shall be analyzed for the following constituent/property and associated unit and using the following test methods (or their latest version):

<u>Constituent/Property</u>	<u>Unit</u>	<u>Test Method</u>
Arsenic	ppm	EPA SW-846 (3040-7130)
Cadmium	ppm	EPA SW-846 (3040-7130)
Chromium	ppm	EPA SW-846 (3040-7130)
Lead	ppm	EPA SW-846 (3040-7130)
Total Halogens	ppm	ASTM E442
Sulfur	%	ASTM D2622-92, ASTM D4294-90, or both ASTM D4057-88 & ASTM D129-91
Flash Point	°F	ASTM D93
Heat of Combustion	Btu/gal	ASTM D240-76
Density	lbs/gal	ASTM D1298-80

Note: Other test methods may be used only after receiving written approval from the Department.
[AC27-222095 and PSD-FL-091D]

F.21. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.
[Rule 62-297.310(1), F.A.C.]

F.22. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rules 62-297.310(2) & (2)(b), F.A.C.]

F.23. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.
[Rule 62-297.310(3), F.A.C.]

F.24. Applicable Test Procedures.

(a) Required Sampling Time.

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) **Minimum Sample Volume.** Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) **Required Flow Rate Range.** For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) **Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

(e) **Allowed Modification to EPA Method 5.** When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.
[Rule 62-297.310(4), F.A.C.]

F.25. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

F.26. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

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

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental-lead; or 100 tons per year or more of any other regulated air pollutant; and,

c. Each NESHAP pollutant, if there is an applicable emission standard.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; SIP approved; 40 CFR 63.1349(c); and, AC27-118674]

Monitoring of Operations

F.27. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

F.28. Monitoring Requirements.

(a) The owner or operator of each Portland cement plant shall prepare for each affected emissions unit subject to the provisions of 40 CFR 63, Subpart LLL, a written operations and maintenance plan. The plan shall be submitted to the Administrator for review and approval as part of the application for a 40 CFR Part 70 permit and shall include the following information:

- (1) Procedures for proper operation and maintenance of the affected emissions unit and air pollution control devices in order to meet the emission limits and operating limits of 40 CFR 63.1343 through 40 CFR 63.1348;
- (2) Corrective actions to be taken when required by paragraph 40 CFR 63.1350(e);
- (3) Procedures to be used during an inspection of the components of the combustion system of each kiln and each in-line kiln raw mill located at the facility at least once per year.

- (4) Procedures to be used to periodically monitor affected sources subject to opacity standards under 40 CFR 63.1348. Such procedures must include the provisions of paragraphs 40 CFR 63.1350(a)(4)(i) through (a)(4)(iv).
- (i) The owner or operator must conduct a monthly 1-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A to 40 CFR Part 60. The test must be conducted while the affected source is in operation.
 - (ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (iii) If no visible emissions are observed during the semi-annual test for any affected source, the owner or operator may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (iv) If visible emissions are observed during any Method 22 test, the owner or operator must conduct a 6-minute test of opacity in accordance with Method 9 of appendix A to 40 CFR Part 60. The Method 9 test must begin within one hour of any observation of visible emissions.
 - (v) The requirement to conduct Method 22 visible emissions monitoring under this paragraph shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.
 - (vi) If any partially enclosed or unenclosed conveying system transfer point is located in a building, the owner or operator of the Portland cement plant shall have the option to conduct a Method 22 visible emissions monitoring test according to the requirements of paragraphs 40 CFR 63.1350(a)(4)(i) through (iv) for each such conveying system transfer point located within the building, or for the building itself, according to paragraph 40 CFR 63.1350(a)(4)(vii).
 - (vii) If visible emissions from a building are monitored, the requirements of paragraphs 40 CFR 63.1350(a)(4)(i) through (iv) apply to the monitoring of the building, and you must also test visible emissions from each side, roof and vent of the building for at least 1 minute. The test must be conducted under normal operating conditions.
- (b) Failure to comply with any provision of the operations and maintenance plan developed in accordance with paragraph 40 CFR 63.1350(a) shall be a violation of the standard.
- (c) The owner or operator of a kiln or in-line kiln/raw mill shall monitor opacity at each point where emissions are vented from these affected sources in accordance with paragraphs 40 CFR 63.1350(c)(1) and (c)(3).
- (1) The owner or operator shall install, calibrate, maintain, and continuously operate a continuous opacity monitor (COM) located at the outlet of the PM control device to continuously monitor the opacity. The COM shall be installed, maintained, calibrated, and operated as required by Subpart A, general provisions of this 40 CFR Part 63, and according to PS-1 of Appendix B, 40 CFR Part 60.
 - (3) To remain in compliance, the opacity must be maintained such that the 6-minute average opacity for any 6-minute block period does not exceed 20 percent. If the average opacity for any 6-minute block period exceeds 20 percent, this shall constitute a violation of the standard.
- (d) The owner or operator of a clinker cooler shall monitor opacity at each point where emissions are vented from the clinker cooler in accordance with paragraphs 40 CFR 63.1350(d)(1) and (d)(3).
- (1) The owner or operator shall install, calibrate, maintain, and continuously operate a COM located at the outlet of the clinker cooler PM control device to continuously monitor the opacity. The COM

shall be installed, maintained, calibrated, and operated as required by Subpart A, general provisions of 40 CFR Part 63, and according to PS-1 of Appendix B, 40 CFR Part 60.

(3) To remain in compliance, the opacity must be maintained such that the 6-minute average opacity for any 6-minute block period does not exceed 10 percent. If the average opacity for any 6-minute block period exceeds 10 percent, this shall constitute a violation of the standard.

(f) The owner or operator of an affected source subject to a limitation on D/F emissions shall monitor D/F emissions in accordance with paragraphs 40 CFR 63.1350(f)(1) through (f)(6).

(1) The owner or operator shall install, calibrate, maintain, and continuously operate a continuous monitor to record the temperature of the exhaust gases from the kiln and in-line kiln/raw mill at the inlet to, or upstream of, the kiln and/or in-line kiln/raw mill PM control devices.

(i) The recorder response range must include zero and 1.5 times either of the average temperatures established according to the requirements in 40 CFR 63.1349(b)(3)(iv).

(ii) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.

(2) The owner or operator shall monitor and continuously record the temperature of the exhaust gases from the kiln and in-line kiln/raw mill at the inlet to the kiln and/or in-line kiln/raw mill PMCD.

(3) The three-hour rolling average temperature shall be calculated as the average of 180 successive one-minute average temperatures.

(4) Periods of time when one-minute averages are not available shall be ignored when calculating three-hour rolling averages. When one-minute averages become available, the first one-minute average is added to the previous 179 values to calculate the three-hour rolling average.

(5) When the operating status of the raw mill of the in-line kiln/raw mill is changed from off to on, or from on to off the calculation of the three-hour rolling average temperature must begin anew, without considering previous recordings.

(6) The calibration of all thermocouples and other temperature sensors shall be verified at least once every three months.

(i) The owner or operator of any kiln or in-line kiln/raw mill subject to a D/F emission limit under 40 CFR 63, Subpart LLL, shall conduct an inspection of the components of the combustion system of each kiln or in-line kiln raw mill at least once per year.

(k) The owner or operator of an affected source subject to a particulate matter standard under 40 CFR 63.1343 shall install, calibrate, maintain and operate a particulate matter continuous emission monitoring system (PM CEMS) to measure the particulate matter discharged to the atmosphere. All requirements relating to installation, calibration, maintenance, operation or performance of the PM CEMS and implementation of the PM CEMS requirement are deferred pending further rulemaking.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1350(a)(1), (2) & (3); (b); (c)(1) & (3); (d)(1) & (3); (f); (i); and, (k)]

F.29. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal used in the kiln I, materials fed to the kiln ~~[in order to estimate clinker production,~~
[AC27-61016/PSD-FL-091; and, AC27-118674]

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F.30. The utilization/firing rate of TDF shall be quantified (weighed) continuously and recorded.
[AC27-222095 and PSD-FL-091C]

F.31. Nitrogen Oxide. The owner or operator shall continuously monitor NO_x concentrations in the stack gases in the CP (cement and power) main plant stack, and convert the same to a mass emission rate (lbs/hr on a 1-hour average) using a FDEP approved conversion factor ~~or a flow monitor. The stack gas flow determined by the approved conversion factor or flow monitor and data from the,~~ NO_x emissions

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monitor (EPA-approved or equivalent) ~~operating~~ in the CP main plant stack ~~shall be used~~ to continuously ~~determine~~ the stack gas flow rate and NO_x concentration. The monitors shall be maintained and calibrated periodically to insure adequate data. The data shall be recorded on an hourly basis and used in the determination of NO_x stack emissions. The calibration of the continuous monitoring system for NO_x shall be in accordance with 40 CFR 60, Appendix B, Performance Specification 2. [AC27-222095 and PSD-FL-091C; and, 40 CFR 60, Appendix B]

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F.32. Sulfur Dioxide and Opacity. The permittee shall operate and maintain continuous monitoring devices for the power boiler/cement plant I main stack exhaust for sulfur dioxide and opacity to demonstrate compliance with the pound per hour SO₂ emissions limits and the visible emissions limits, respectively, in Specific Conditions **F.7.** and **F.8.**, respectively. ~~The owner or operator shall continuously monitor SO₂ concentrations in the stack gases in the CP (cement and power) main plant stack, and convert the same to a mass emission rate (lbs/hr) using a FDEP approved conversion factor or a flow monitor.~~ The monitoring devices shall meet the applicable requirements of Chapter 62-297, F.A.C. ~~and 40 CFR 60, Appendix B,~~ including certification of each device. The permittee shall provide the Department with 30 days notice on each certification. [PA 82-17 & PA 82-17K; 40 CFR 60, Appendix B; Rule 62-297.520, F.A.C.; PSD-FL-090; and, 40 CFR 63.1350(c)(1)]

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F.33. Reserved.

F.34. The owner or operator shall install, calibrate, maintain, and operate a continuous emissions monitoring system to measure O₂ emissions in the cement kiln and clinker cooler control device stack; and, the boiler stack. The calibration of the continuous monitoring system shall be in accordance with 40 CFR 60, Appendix B, Performance Specification 3. The oxygen monitor shall be used with automatic feedback or manual controls to continuously maintain air/fuel ratio parameters at an optimum. [Rule 62-297.520, F.A.C.; 40 CFR 60, Appendix B; PA 82-17 & PA 82-17E; and, AC27-222095]

Notification, Recordkeeping and Reporting Requirements

F.35. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

F.36. The records of fuel usage with the fuel analysis and the daily production rates (including clinker production rate) and kiln feed rates shall be recorded and reported quarterly to the Department's Southwest District office. [AC27-61016/PSD-FL-091; AC27-118674]

F.37. The quantity of all deliveries of TDF shall be documented and kept on record/file. [AC27-222095 and PSD-FL-091C]

F.38. On-specification Used Oil.

- a. The results of each sample analysis shall be submitted to the Department's Southwest District and the Hernando County Planning offices within 30-days after the sample is taken.
- b. The dates and quantities of both on-specification used oil and purchased fuel oil transferred to the cement kiln's storage tank shall be reported quarterly (i.e., Jan.-Mar., April-June, July-Sept., and Oct.-Dec.) to the Department's Southwest District and the Hernando County Planning offices and due during the month following the ending quarter.

[AC27-222095 and PSD-FL-091D]

F.39. Notification requirements.

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(a) The notification provisions of 40 CFR 63, Subpart A, are contained in Appendix 40 CFR 63, Subpart A (attached), and are applicable. If any State requires a notice that contains all of the information required in a notification listed in 40 CFR 63.1353, the owner or operator may send the Administrator a copy of the notice sent to the State to satisfy the requirements of 40 CFR 63.1353 for that notification.

(b) Each owner or operator subject to the requirements of 40 CFR 63, Subpart LLL shall comply with the notification requirements in 40 CFR 63.9 as follows:

(1) Initial notifications as required by 40 CFR 63.9(b) through (d). For the purposes of 40 CFR 63, Subpart LLL, a Title V or 40 CFR Part 70 permit application may be used in lieu of the initial notification required under 40 CFR 63.9(b), provided the same information is contained in the permit application as required by 40 CFR 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under 40 CFR Part 70 of this chapter and has received delegation of authority from the EPA. Permit applications shall be submitted by the same due dates as those specified for the initial notification.

(2) Notification of performance tests, as required by 40 CFR 63.7 and 63.9(e).

(3) Notification of opacity and visible emission observations required by 40 CFR 63.1349 in accordance with 40 CFR 63.6(h)(5) and 63.9(f).

(4) Notification, as required by 40 CFR 63.9(g), of the date that the continuous emission monitor performance evaluation required by 40 CFR 63.8(e) of this part is scheduled to begin.

(5) Notification of compliance status, as required by 40 CFR 63.9(h).

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1353]

F.40. Reporting requirements.

(a) The reporting provisions of 40 CFR 63, Subpart A, are contained in Appendix 40 CFR 63, Subpart A (attached), and are applicable. If any State requires a report that contains all of the information required in a report listed in 40 CFR 63.1354, the owner or operator may send the Administrator a copy of the report sent to the State to satisfy the requirements of 40 CFR 63.1354 for that report.

(b) The owner or operator of an affected source shall comply with the reporting requirements specified in 40 CFR 63.10 of the general provisions of 40 CFR Part 63, Subpart A, as follows:

(1) As required by 40 CFR 63.10(d)(2), the owner or operator shall report the results of performance tests as part of the notification of compliance status.

(2) As required by 40 CFR 63.10(d)(3), the owner or operator of an affected source shall report the opacity results from tests required by 40 CFR 63.1349.

(3) As required by 40 CFR 63.10(d)(4), the owner or operator of an affected source who is required to submit progress reports as a condition of receiving an extension of compliance under 40 CFR 63.6(i) shall submit such reports by the dates specified in the written extension of compliance.

(4) As required by 40 CFR 63.10(d)(5), if actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the owner or operator shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports; and

(5) Any time an action taken by an owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the owner or operator shall make an immediate report of the actions taken for that event within 2 working days, by telephone call or facsimile (FAX) transmission. The immediate report shall be followed by a letter, certified by the owner or operator or other responsible

official, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

(6) As required by 40 CFR 63.10(e)(2), the owner or operator shall submit a written report of the results of the performance evaluation for the continuous monitoring system required by 40 CFR 63.8(e). The owner or operator shall submit the report simultaneously with the results of the performance test.

(7) As required by 40 CFR 63.10(e)(2), the owner or operator of an affected source using a continuous opacity monitoring system to determine opacity compliance during any performance test required under 40 CFR 63.7 and described in 40 CFR 63.6(d)(6) shall report the results of the continuous opacity monitoring system performance evaluation conducted under 40 CFR 63.8(e).

(8) As required by 40 CFR 63.10(e)(3), the owner or operator of an affected source equipped with a continuous emission monitor shall submit an excess emissions and continuous monitoring system performance report for any event when the continuous monitoring system data indicate the source is not in compliance with the applicable emission limitation or operating parameter limit.

(9) The owner or operator shall submit a summary report semiannually which contains the information specified in 40 CFR 63.10(e)(3)(vi). In addition, the summary report shall include:

- (i) All exceedances of maximum control device inlet gas temperature limits specified in 40 CFR 63.1344(a) and (b);
- (ii) All failures to calibrate thermocouples and other temperature sensors as required under 40 CFR 63.1350(f)(7) of 40 CFR 63, Subpart LLL; and
- (iii) All failures to maintain the activated carbon injection rate, and the activated carbon injection carrier gas flow rate or pressure drop, as applicable, as required under 40 CFR 63.1344(c).
- (iv) The results of any combustion system component inspections conducted within the reporting period as required under 40 CFR 63.1350(i).
- (v) All failures to comply with any provision of the operation and maintenance plan developed in accordance with 40 CFR 63.1350(a).

(10) If the total continuous monitoring system downtime for any CEM or any continuous monitoring system (CMS) for the reporting period is ten percent or greater of the total operating time for the reporting period, the owner or operator shall submit an excess emissions and continuous monitoring system performance report along with the summary report.

[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1354(a) and (b)(1) thru (10)]

F.41. Recordkeeping Requirements.

(a) The owner or operator shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355 recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent **five** years of data shall be retained on site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.

(b) The owner or operator shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (b)(3); and

- (1) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9;
- (2) All records of applicability determination, including supporting analyses; and
- (3) If the owner or operator has been granted a waiver under 40 CFR 63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements.

[Rules 62-204.800 and 62-213.440, F.A.C.; and, 40 CFR 63.1355(a) and (b)]

F.42. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

F.43. An Annual Operation Report (AOR) shall be submitted to the Department's Southwest District office by March 1 reporting the kiln's averaged process input rate and clinker production of each month of the previous year.- The AOR shall also contain the total amount, separately and by weight, of shredded and whole tires utilized/fired during the previous year.
[AC27-222095 and PSD-FL-091C]

Miscellaneous

F.44. Reserved.

F.45. For PSD tracking purposes only, the potential total hydrocarbon emissions are 22.8 tons/year.
[AC27-222095 and PSD-FL-091C]

F.46. Compliance Plan. "Appendix CP, Compliance Plan", is incorporated by reference and is a part of the permit.
[Rule 62-213.440(2), F.A.C.]

Subsection G. Reserved.

Subsection H. This section addresses the following emissions units.

Brooksville Power Plant	
E.U. ID/Facility ID No.	Brief Description
-035/D-38	Limestone Rock Bin with Baghouse
-036/D-31	Contaminated Fly Ash & Filter Dust Bin with Baghouse
-037/D-39	Limestone Screening System with Baghouse
-038/D-13	Limestone Fines Storage Bin with Baghouse
-039/Z-31	Lime Dust Storage Bin with Baghouse

Limestone Rock Bin with Baghouse. This emissions unit is a storage bin for limestone rock. The particulate matter (PM) emissions from the materials being stored are controlled by a low temperature baghouse fabric filter system. The stack height is 100 feet, with an exit diameter of 2.5 feet and an exit temperature of 70 °F. The design volumetric flow rate is 10,500 acfm.

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Contaminated Fly Ash & Filter Dust Bin with Baghouse. This emissions unit is a storage bin for contaminated fly ash and filtered dust. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 200 feet, with an exit diameter of 1.5 feet and an exit temperature of 180 °F. The design volumetric flow rate is 11,000 acfm.

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Limestone Screening System with Baghouse. This emissions unit is the operation of the limestone screening system to size limestone. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 30 feet, with an exit diameter of 2.0 feet and an exit temperature of 150 °F. The design volumetric flow rate is 3,000 acfm.

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Limestone Fines Storage Bin with Baghouse. This emissions unit is the operation of a storage bin for dried limestone fines for the cement plant. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 150 feet, with an exit diameter of 3.5 feet and an exit temperature of 100 °F. The design volumetric flow rate is 19,000 acfm.

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Lime Dust Storage Bin with Baghouse. This emissions unit is a storage bin for lime dust. The PM emissions are controlled by a low temperature baghouse fabric filter system. The stack height is 100 feet, with an exit diameter of 2.5 feet and an exit temperature of 120 °F. The design volumetric flow rate is 6,300 acfm.

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{Permitting note: These emissions units are regulated under Rule 62-297.620(4), F.A.C., Exceptions and Approval of Alternate Procedures and Requirements; Rules 62-212.400 and 62-212.410, F.A.C., Prevention of Significant Deterioration (PSD-FL-090 and PSD-FL-091) and Best Available Control Technology (BACT), respectively; and, Power Plant Siting: PA 82-17.}

The following Specific Conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

H.1. Permitted Capacity. The maximum process/transfer/throughput rates are:

E.U. ID No.	Brief Description	Maximum Rate
-035/D-38	Limestone Rock Bin with Baghouse	400 tons/hour
-036/D-31	Contaminated Fly Ash & Filter Dust Bin with Baghouse	100 tons/hour
-037/D-39	Limestone Screening System with Baghouse	160 tons/hour
-038/D-13	Limestone Fines Storage Bin with Baghouse	100 tons/hour
-039/Z-31	Lime Dust Storage Bin with Baghouse	30 tons/hour

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; PSD-FL-090 and PSD-FL-091; and, PA 82-17]

H.2. Hours of Operation.

a. The Limestone Rock Bin and Contaminated Fly Ash & Filter Dust Bin operations are allowed to operate continuously, i.e., 8,760 hours/year.

b. The Limestone Screening System, Limestone Fines Storage Bin and Lime Dust Storage Bin operations are allowed to operate 7,884 hours/year.

[AC27-118676, -118681, -091426, -091427, -091429, & -091430]

H.3. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition **H.12.**

[Rule 62-297.310(2), F.A.C.]

H.4. Method of Operation. The emissions units either process or transfer materials used in the injection of limestone for SO₂ control for the power boiler. The fly ash handling system (including transfer and silo storage) will be totally enclosed and vented (including pneumatic system exhaust) through fabric filters.

[Rule 62-213.410, F.A.C.; PA 82-17 and PA 82-17E; and, PSD-FL-090]

Emission Limitations

{Permitting Note: Unless otherwise specified, the averaging time for Specific Condition H.5. is based on the specified averaging time of the applicable test method.}

H.5. Particulate Matter. The maximum allowable particulate matter emissions are:

E.U. ID No.	Brief Description	Maximum Allowable Limits
-035/D-38	Limestone Rock Bin with Baghouse	0.015 gr/acf; 1.1 lbs/hr; 4.1 TPY
-036/D-31	Contaminated Fly Ash & Filter Dust Bin with Baghouse	0.02 gr/acf; 1.41 lbs/hr; 5.4 TPY
-037/D-39	Limestone Screening System with Baghouse	0.015 gr/acf; 0.77 lb/hr; 3.04 TPY
-038/D-13	Limestone Fines Storage Bin with Baghouse	0.015 gr/acf; 0.77 lb/hr; 3.04 TPY
-039/Z-31	Lime Dust Storage Bin with Baghouse	0.015 gr/acf; 1.16 lbs/hr; 4.56 TPY

[PSD-FL-090 & PSD-FL-091 and BACT; PA 82-17; and, AC27-118676, -118681, -091426, -091427, -091429, & -091430]

H.6. Visible Emissions. Visible emissions shall not exceed 5 percent opacity, since each emissions unit's potential particulate matter emissions are less than 100 TPY and is equipped with a baghouse control system. As long as the visible emissions do not exceed 5 percent opacity, compliance is assumed for the particulate matter limitations established in Specific Condition **H.5**. See Specific Condition **H.10**.

If the Department has reason to believe that the particulate matter weight emissions standard in Specific Condition **H.5** is not being met, it shall require that compliance be demonstrated by the test method specified in Specific Condition **H.9**.

[Rule 62-297.620(4), F.A.C.; and, AC27-118676, -118681, -091426, -091427, -091429, & -091430]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

H.7. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

H.8. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

H.9. Particulate Matter. Particulate matter emissions compliance testing shall be demonstrated using EPA Method 5 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions **H.5** and **H.6**.

[Rules 62-204.800 and 62-297.401, F.A.C.]

H.10. Visible Emissions. Visible emissions compliance testing shall be demonstrated annually using EPA Method 9 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. See Specific Conditions **H.6** and **H.16**.

[Rules 62-204.800 and 62-297.401, F.A.C.]

H.11. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic

mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

H.12. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

H.13. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

H.14. Applicable Test Procedures.

(a) **Required Sampling Time.**

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

2. **Opacity Compliance Tests.** When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.

(b) **Minimum Sample Volume.** Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.

(c) **Required Flow Rate Range.** For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

(d) **Calibration of Sampling Equipment.** Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1 (attached).

(e) **Allowed Modification to EPA Method 5.** When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

[Rule 62-297.310(4), F.A.C.]

H.15. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.

[Rule 62-297.310(6), F.A.C.]

H.16. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate.

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

a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; or, 100 tons per year or more of any other regulated air pollutant; and,

c. Each NESHAP pollutant, if there is an applicable emission standard.

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

Monitoring of Operations

H.17. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

Recordkeeping and Reporting Requirements

H.18. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

H.19. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
 1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.

18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed-calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rules 62-213.440 and 62-297.310(8), F.A.C.]

Subsection I. This section addresses the following emissions unit.

Brooksville Power Plant	
E.U. ID/Facility ID No.	Brief Description
-018	Power Plant Boiler with Dry Limestone Injection Scrubbing followed with a Baghouse System

This emissions unit is a net delivered 150 MW fossil fuel fired boiler with a 320 foot stack. The primary fuel burned is coal, with new distillate No. 2 fuel oil used for startup. Control activity includes dry limestone injection scrubbing followed with a fabric filter baghouse system. The exit diameter is 16 feet and the exit temperature is 300°F. The volumetric flow rate is 840,000 acfm.

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{Permitting note: This emissions unit is regulated under Rule 62-296.405, F.A.C., Fossil Fuel Steam Generators with more than 250 million Btu per Hour Heat Input; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD-FL-090 and PSD-FL-090D); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT); and, Power Plant Siting: PA 82-17 and PA 82-17(A thru K.)

The following Specific Conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

I.1. Permitted Capacity. The heat input rate of the power plant boiler, with or without the cement kiln I operating, shall not exceed the maximum necessary to produce 150 MW (net delivered) of power and shall in no case exceed 1850 MMBtu/hr, maximum three-hour average.
[PA 82-17E; and, PSD-FL-090D]

I.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200(PTE); and, PA 82-17]

I.3. Emissions Unit Operating Rate Limitation After Testing. See Specific Condition **I.30**.
[Rule 62-297.310(2), F.A.C.]

I.4. Methods of Operation - Fuels.

- a. The primary fuel allowed to be burned is coal.
- b. New distillate No. 2 fuel oil is allowed for startup purposes. Any fuel oil to be fired in the unit shall be "new oil", which means an oil which has been refined from crude oil and not been used.
[Rule 62-213.410, F.A.C.; PSD-FL-090 and PSD-FL-090D; and, PA 82-17 and PA 82-17E]

Emission Limitations and Standards

{Permitting Note: Unless otherwise specified, the averaging time for Specific Conditions I.7. thru I.11. and I.13. are based on the specified averaging time of the applicable test method.}

I.5. Any fuel oil to be fired in the unit shall be "new oil", which means an oil which has been refined from crude oil and not been used. The quantity of fuel oil used by the boiler shall not cause the allowable emissions limits listed in the table below to be exceeded. Such emissions may be calculated in accordance with the latest edition of AP-42.

Allowable Emissions Limits	
Pollutant	lb/MMBtu
Particulate Matter	0.015
Sulfur Dioxide	0.31
Nitrogen Oxides	0.16
Visible Emissions	Maximum 20% Opacity

{Permitting note: This table applies when **only** fuel oil is being fired.}

[PA 82-17]

I.6. Visible Emissions.

- a. **Power Plant Boiler: Visible Emissions.** When burning coal only, visible emissions shall not exceed 20% opacity, 6-minute average, except for one 6-minute period per hour for not more than 27% opacity.
- b. **Combined Cement Plant I and Power Plant Boiler: Visible Emissions.** Visible emissions from the combined cement plant I and power plant boiler shall not exceed 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity.

[PA 82-17; PSD-FL-090; and, BACT]

I.7. Particulate Matter (PM/PM₁₀).

- a. **Power Plant Boiler: PM/PM₁₀.** PM/PM₁₀ emissions from the power plant boiler when burning coal shall not exceed 0.0135 pound per MMBtu heat input (25.0 pounds per hour at 1850 MMBtu/hr heat input), averaging time per 40 CFR 60.46.
- b. **Combined Cement Plant I and Power Plant Boiler: PM/PM₁₀.** PM/PM₁₀ emissions from the combined cement plant I and power plant boiler shall not exceed 0.0135 pound per MMBtu heat input (25.0 pounds per hour at 1850 MMBtu/hr heat input) plus 0.3 pound from cement kiln I and 0.1 pound from clinker cooler I per ton of kiln I's feed (dry basis), averaging time per 40 CFR 60.46.

[PA 82-17 and PA 82-17E; PSD-FL-090 and PSD-FL-090D; and, BACT]

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I.8. Sulfur Dioxide (SO₂).

- a. **Power Plant Boiler: SO₂.** SO₂ emissions from the power plant boiler while burning coal shall not exceed 1.2 pounds per MMBtu heat input, maximum two hour average, and 770 pounds per hour, maximum three hour average.
- b. **Combined Cement Plant I and Power Plant Boiler: SO₂.** SO₂ emissions from the combined cement plant I and power plant boiler shall not exceed 1.2 pounds per MMBtu heat input, maximum two hour average, and 781 pounds per hour, maximum three hour average.

[PA 82-17 and PA 82-17E; PSD-FL-090 and PSD-FL-090D; and, BACT]

I.9. Nitrogen Oxides (NO_x).

a. Power Plant Boiler: NO_x. NO_x emissions from the power plant boiler while burning coal shall not exceed 0.7 pound per MMBtu heat input, averaging time per Chapter 62-297, F.A.C., not to exceed 846 pounds per hour.

b. Combined Cement Plant I and Power Plant Boiler: NO_x. NO_x emissions from the combined cement plant I and power plant boiler shall not exceed 0.7 pound per MMBtu heat input plus 2.9 pounds per ton of kiln I's feed (dry basis), averaging time per Chapter 62-297, F.A.C., not to exceed 1205 pounds per hour.

[PA 82-17 and PA 82-17E; PSD-FL-090 and PSD-FL-090D; and, BACT]

I.10. Combined Cement Plant I and Power Plant Boiler: Total Fluorides. Total fluoride emissions from the combined cement plant I and power plant boiler shall not exceed 0.7 pound per hour.

[PSD-FL-090]

I.11. Combined Cement Plant I and Power Plant Boiler: Sulfuric Acid Mist. Sulfuric acid mist emissions from the combined cement plant I and power plant boiler shall not exceed 1.7 pounds per hour.

[PSD-FL-090]

I.12. Combined Cement Plant I and Power Plant Boiler: Beryllium. Reserved.

[PSD-FL-090(A) & 091(E); and, 0530021-006-AC]

I.13. Combined Cement Plant I and Power Plant Boiler: Mercury. Mercury emissions from the combined cement plant I and power plant boiler shall not exceed 0.03 pound per hour.

[PSD-FL-090]

Excess Emissions

{Permitting note: The Excess Emissions Rule at Rule 62-210.700, F.A.C., cannot vary any requirement of an NSPS, NESHAP, or Acid Rain program provision.}

I.14. Excess emissions resulting from startup, shutdown, or malfunction of any emissions unit shall be permitted provided (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

I.15. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited.

[Rule 62-210.700(4), F.A.C.]

Test Methods and Procedures

I.16. PM, NO_x, SO₂, and Visible Emissions. The permittee shall annually conduct (See Specific Condition **I.30**):

a. Performance tests on the main stack for PM, NO_x, SO₂, and visible emissions:

(1) during normal operations when the power plant and cement plant I are operating in combination; and,

(2) at or near 1,850 MMBtu/hr heat input when the power plant is operating alone.

[PSD-FL-090 and PSD-FL-091; PA 82-17 and PA 82-17E; and, Rule 62-297.310(7), F.A.C.]

I.17. Visible Emissions.

a. Compliance with the visible emissions limits in Specific Condition **I.6.** shall be demonstrated in accordance with EPA Method 9 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. [Rule 62-297.401, F.A.C.; PA 82-17 and PA 82-17E; PSD-FL-090; and, 40 CFR 60, Appendix A]

I.18. Particulate Matter (PM/PM₁₀). Compliance with the PM/PM₁₀ emissions limits in Specific Condition **I.7.** shall be demonstrated in accordance with EPA Method 5 or 17 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. [Rules 62-204.800 and 62-297.401, F.A.C.; 40 CFR 60.46; PA 82-17 and PA 82-17E; PSD-FL-090; and, 40 CFR 60, Appendix A]

I.19. Sulfur Dioxide. Compliance with the SO₂ emissions limits in Specific Condition **I.8.** shall be demonstrated in accordance with EPA Method 6 or 6C pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. [Rule 62-297.401, F.A.C.; PA 82-17 and PA 82-17E; PSD-FL-090; and, 40 CFR 60, Appendix A]

I.20. Nitrogen Oxide. Compliance with the NO_x emissions limits in Specific Condition **I.9.** shall be demonstrated in accordance with EPA Method 7 or 7E pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C. [Rule 62-297.401, F.A.C.; PA 82-17 and PA 82-17E; PSD-FL-090; and, 40 CFR 60, Appendix A]

I.21. Total Fluorides. Compliance with the fluoride emissions limit in Specific Condition **I.10.** shall be demonstrated, if required by EPA, in accordance with EPA Method 13A or 13B, and 40 CFR 60, Appendix A, [PSD-FL-090; and, 40 CFR 60, Appendix A]

Comment [FB4]: NSPS does not apply.

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I.22. Sulfuric Acid Mist. Compliance with the sulfuric acid mist emissions limit in Specific Condition **I.11.** shall be demonstrated, if required by EPA, in accordance with EPA Method 8, and 40 CFR 60, Appendix A, [PSD-FL-090; and, 40 CFR 60, Appendix A]

Comment [FB5]: NSPS does not apply.

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I.23. Beryllium. Reserved.
[PSD-FL-090(A) & 091(E); and, 0530021-006-AC]

I.24. Mercury. Compliance with the mercury emissions limit in Specific Condition **I.13.** shall be demonstrated, if required by EPA, in accordance with EPA Method 101A, and 40 CFR 60, Appendix A, [PSD-FL-090; and, 40 CFR 60, Appendix A]

Comment [FB6]: NSPS does not apply.

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I.25. EPA Methods 1 and 2 shall be used for determining stack gas velocity when required in Specific Conditions **I.18.** through **I.24.**
[PSD-FL-090; and, 40 CFR 60, Appendix A]

I.26. Performance tests shall be conducted and data reduced in accordance with methods and procedures outlined in Chapter 62-297, F.A.C.
[PA 82-17 and PA 82-17E; and, PSD-FL-090]

Comment [FB7]: This should reference the NSPS for power plants.

Deleted: 40 CFR 60.46 and C

I.27. Performance tests shall be conducted under such conditions as the Department shall specify based on representative performance of the facility (See Specific Condition **I.30.**). The permittee shall make

available to the Department such records as may be necessary to determine the conditions of the performance tests.

[PA 82-17 and PA 82-17E; and, PSD-FL-090]

I.28. The permittee shall provide 30 days notice of the performance tests or 10 working days for stack tests in order to afford the Department the opportunity to have an observer present.

[PA 82-17]

I.29. Required Number of Test Runs. For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five day period allowed for the test, the Secretary or his or her designee may accept the results of the two complete runs as proof of compliance, provided that the arithmetic mean of the results of the two complete runs is at least 20 percent below the allowable emission limiting standards.

[Rule 62-297.310(1), F.A.C.]

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I.30. Operating Rate During Testing. Testing of emissions shall be conducted with each emissions unit operation at permitted capacity, which is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the emissions unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.

[Rules 62-297.310(2) & (2)(b), F.A.C.]

I.31. Calculation of Emission Rate. The indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the separate test runs unless otherwise specified in a particular test method or applicable rule.

[Rule 62-297.310(3), F.A.C.]

I.32. Applicable Test Procedures.

(a) **Required Sampling Time.**

1. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
2. Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:

- c. The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
- (b) Minimum Sample Volume. Unless otherwise specified in the applicable rule, the minimum sample volume per run shall be 25 dry standard cubic feet.
- (c) Required Flow Rate Range. For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.
- (d) Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
- (e) Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.
[Rule 62-297.310(4), F.A.C.]

1.33. Required Stack Sampling Facilities. When a mass emissions stack test is required, the permittee shall comply with the requirements contained in Appendix SS-1, Stack Sampling Facilities, attached to this permit.
[Rule 62-297.310(6), F.A.C.]

1.34. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

1. For excess emission limitations for particulate matter specified in Rule 62-210.700, F.A.C., a compliance test shall be conducted annually while the emissions unit is operating under soot blowing conditions in each federal fiscal year during which soot blowing is part of normal emissions unit operation, except that such test shall not be required in any federal fiscal year in which a fossil fuel steam generator does not burn liquid fuel for more than 400 hours other than during startup.

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2. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

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a. Did not operate; or

b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.

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

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a. Visible emissions, if there is an applicable standard;

b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and

c. Each NESHAP pollutant, if there is an applicable emission standard.

4. An annual compliance test for particulate matter emissions shall not be required for any fuel burning emissions unit that, in a federal fiscal year, does not burn liquid fuel, other than during startup, for a total of more than 400 hours.

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5. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

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(b) Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

Monitoring of Operations

I.35. Samples of each shipment received of all fuel oil and coal fired shall be taken and an ultimate analysis obtained including the heating value on a moisture free basis. Accordingly, samples shall be taken of each fuel shipment received. Coal sulfur content shall be determined and recorded on a daily basis.

[PA 82-17 and PA 82-17E; and, PSD-FL-090]

I.36. The permittee shall maintain a daily log of the amounts and types of fuel used and copies of the ultimate fuel analyses containing the heating value on a moisture free basis.

[PA 82-17 and PA 82-17E]

I.37. Instruments shall be installed, calibrated and maintained to continuously measure the amounts of coal and limestone used in the power boiler.

[PA 82-17 and PA 82-17E; and, PSD-FL-090]

I.38. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

I.39. The permittee shall have available a written plan or procedure that will allow the permittee to monitor emission control equipment efficiency and enable the permittee to return malfunctioning equipment to proper operation as expeditiously as possible.
[PA 82-17 and PA 82-17E; and, PSD-FL-090]

Continuous Monitoring Requirements

I.40. A flue gas oxygen meter shall be operated and maintained to continuously monitor a representative sample of the flue gas. The oxygen monitor shall be used with automatic feedback or manual controls to continuously maintain air/fuel ratio parameters at an optimum. See Specific Condition **F.34**.
[PA 82-17 and PA 82-17E; and, PSD-FL-090]

I.41. The permittee shall operate and maintain continuous monitoring devices for the power boiler/cement plant I main stack exhaust for sulfur dioxide and opacity to demonstrate compliance with the pound per hour SO₂ emissions limits and the visible emissions limits, respectively, in Specific Conditions **I.8.** and **I.6.**, respectively. The monitoring devices shall meet the applicable requirements of Chapter 62-297, F.A.C. and 40 CFR 60, Appendix B, including certification of each device pursuant to 40 CFR Part 60, Appendix B. The owner or operator shall continuously monitor SO₂ concentrations in the stack gases in the CP (cement and power) main plant stack, and convert the same to a mass emission rate (lbs/hr) using a FDEP approved conversion factor or a flow monitor. See Specific Condition **F.32**.
Note that Emission Unit 018 is not subject to NSPS.
[PA 82-17 and PA 82-17K; Rule 62-297.520, F.A.C.; and, PSD-FL-090]

Deleted: . 40 CFR 60.45, and 40 CFR 60.13.

Deleted: The permittee shall provide the Department with 30 days notice on each certification.

Recordkeeping and Reporting Requirements

I.42. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department.
[Rule 62-210.700(6), F.A.C.]

I.43. Submit to the Department a written report of emissions in excess of emission limiting standards as set forth in Rule 62-296.405(1), F.A.C., for each calendar quarter. The nature and cause of the excess emissions shall be explained. This report does not relieve the owner or operator of the legal liability for violations. All recorded data shall be maintained on file by the Source for a period of five years.
[Rules 62-213.440 and 62-296.405(1)(g), F.A.C.]

I.44. The records of coal and limestone used in the power boiler and fuel analyses shall be reported quarterly to the Department's Southwest District office.
[PA 82-17 and PA 82-17E; and, PSD-FL-090]

I.45. Stack monitoring, fuel usage, and fuel analyses data shall be reported to the Department's Southwest District office and to the Hernando County Health Department on a quarterly basis.
[PA 82-17 and PA 82-17E; and, PSD-FL-090]

I.46. Records of all fuel analyses and the daily log of the amounts and types of fuel used shall be kept for public inspection for a minimum of 5 (five) years after the data are recorded.
[PA 82-17 and PA 82-17E; PSD-FL-090; and, Rule 62-213.440, F.A.C.]

I.47. A written report of the results of all performance tests shall be furnished to the Department within 45 days of completion of the tests.

[PA 82-17 and PA 82-17E; PSD-FL-090; and, Rule 62-297.310(8), F.A.C.]

I.48. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
 1. The type, location, and designation of the emissions unit tested.
 2. The facility at which the emissions unit is located.
 3. The owner or operator of the emissions unit.
 4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 8. The date, starting time and duration of each sampling run.
 9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 10. The number of points sampled and configuration and location of the sampling plane.
 11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 12. The type, manufacturer and configuration of the sampling equipment used.
 13. Data related to the required calibration of the test equipment.
 14. Data on the identification, processing and weights of all filters used.
 15. Data on the types and amounts of any chemical solutions used.
 16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
 18. All measured and calculated data required to be determined by each applicable test procedure for each run.
 19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
 20. The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
 21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

Subsection J. This section addresses the following emissions unit/activity.

Brooksville Cement Plant I/Power Plant	
E.U. ID/Facility ID No.	Brief Description
-042/	Coal Receiving, Handling and Transfer Activities (fugitives)

Coal Receiving, Handling and Transfer Activities (fugitives). This emissions unit is an activity of receiving, storage, and transferring/conveying 568,300 tons per year of coal to the Florida Crushed Stone Company's cement plant I/power plant (C/P plants). The coal will be received in unit trains and will be bottom-dumped from moving rail cars through an open elevated trestle to a coal receiving area. From this area, the coal will be moved to a storage area by a bulldozer with the storage pile being shaped and compacted during the transfer. The resulting coal storage area will cover approximately 7.8 acres and will be approximately 10 feet high. The coal storage area will have a capacity of approximately 55,000 tons. The coal will be recovered from the coal storage pile by a rubber tired front-end loader and transferred to a receiving hopper. The maximum daily coal transfer rate from the storage pile to the C/P plants' receiving system will be 1,740 tons per day. From the receiving hopper, the coal will be transferred by covered conveyor belt to a screening system and then to one of five coal bins that will supply the C/P plants. Water sprays or chemical wetting agents and stabilizers will be used at the coal receiving area, the coal storage area, and the coal transfer system to control fugitive particulate matter emissions and minimize visible emissions. All conveyors and conveyor transport points will be enclosed to preclude particulate matter emissions (except those directly associated with the coal stacker/reclaimer or emergency stockout stacker/reclaimer or emergency stockout). The inactive coal storage piles will be shaped, compacted and oriented to minimize wind erosion. Water sprays or chemical wetting agents and stabilizers will be applied to the storage piles, handling equipment, etc. during dry periods and as necessary to all coal handling facilities to minimize visible emissions.

{Permitting Note: This emissions unit/activity is regulated under Rule 62-210.300, F.A.C., Permits Required; Rule 62-212.400, F.A.C., Prevention of Significant Deterioration (PSD-FL-090); and, Power Plant Siting: PA 82-17 and PA 82-17E.}

The following Specific Conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

J.1. Hours of Operation. The emissions unit/activity is allowed to operate continuously, i.e., 8,760 hours/year.
[AC27-117650]

J.2. Method of Operation. This emissions unit is an activity of receiving, storage, and transferring/conveying coal to the Florida Crushed Stone's C/P plants.
[Rule 62-213.410, F.A.C.]

Emission Limitations

J.3. Visible Emissions. Visible emissions shall not exceed 10 % opacity from the receiving, handling or transferring of coal.
[AC27-117650]

J.4. Water sprays or chemical wetting agents and stabilizers shall be applied to the storage piles, handling equipment, etc. during dry periods and as necessary to all coal handling facilities to minimize visible emissions.

[PSD-FL-090]

J.5. Unconfined Emissions of Particulate Matter.

a. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or, industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emissions.

b. The permittee shall take reasonable precautions and work practices to prevent fugitive particulate matter emissions at the site, such as the application of water, wetting agents and/or dust suppressants on roads and any construction activity, landscaping or the planting of vegetation, and enclosure or covering of conveyor systems.

[AC27-117650; PSD-FL-090; PA 82-17 and PA 82-17E; and, Rule 62-296.320(4)(c)1. & 3., F.A.C.]

J.6. Water sprays or chemical wetting agents and stabilizers will be used at the coal receiving area, the coal storage area, and the coal transfer system to control fugitive particulate matter emissions.

[PA 82-17 and PA 82-17E; PSD-FL-090; and, Rule 62-296.320(4)(c)3., F.A.C.]

J.7. All conveyors and conveyor transport points will be enclosed to preclude particulate matter emissions (except those directly associated with the coal stacker/reclaimer or emergency stockout stacker/reclaimer or emergency stockout).

[PA 82-17 and PA 82-17E; PSD-FL-090; and, Rule 62-296.320(4)(c)3., F.A.C.]

J.8. The inactive coal storage piles will be shaped, compacted and oriented to minimize wind erosion.

[PSD-FL-090; and, Rule 62-296.320(4)(c)3., F.A.C.]

J.9. A water spray system shall be installed and used as necessary to control fugitive dust emissions during coal unloading operation from train cars to the receiving area.

[AC27-117650; and, Rule 62-296.320(4)(c)3., F.A.C.]

J.10. The following table reflects the total projected/potential particulate matter emissions from the receiving, handling and transferring of coal. Compliance with these particulate matter emission projections will be presumed if the 10% visible emissions limit is met and the work practices are observed:

<u>Activity</u>	<u>lbs/hr</u>	<u>TPY</u>
"Receiving"	0.60	0.03
"Receiving and Storage"		
Transfer	<0.01	0.004
Traffic	0.75	0.81
"Storage to C/P Plants System"		
Transfer	0.01	0.012
Traffic	1.10	2.413
"C/P Plants System"		
Four Transfers	0.01	0.017
<u>Wind Erosion from Storage</u>	<u>0.26</u>	<u>0.056</u>
<u>Total</u>	<u>2.74</u>	<u>3.3</u>

[AC27-117650]

Test Methods and Procedures

J.11. Visible Emissions. Visible emissions shall be demonstrated using DEP Method 9 pursuant to Chapter 62-297, F.A.C. See Specific Conditions **J.3.** and **J.12.**
 [AC27-117650; Rule 62-297.401, F.A.C.]

J.12. DEP Method 9. The provisions of EPA Method 9 (40 CFR 60, Appendix A) are adopted by reference with the following exceptions:

1. EPA Method 9, Section 2.4, Recording Observations. Opacity observations shall be made and recorded by a certified observer at sequential fifteen second intervals during the required period of observation.
2. EPA Method 9, Section 2.5, Data Reduction. For a set of observations to be acceptable, the observer shall have made and recorded, or verified the recording of, at least 90 percent of the possible individual observations during the required observation period. For single-valued opacity standards (e.g., 20 percent opacity), the test result shall be the highest valid six-minute average for the set of observations taken. For multiple-valued opacity standards (e.g., 20 percent opacity, except that an opacity of 40 percent is permissible for not more than two minutes per hour) opacity shall be computed as follows:
 - a. For the basic part of the standard (i.e., 20 percent opacity) the opacity shall be determined as specified above for a single-valued opacity standard.
 - b. For the short-term average part of the standard, opacity shall be the highest valid short-term average (i.e., two-minute, three-minute average) for the set of observations taken.

In order to be valid, any required average (i.e., a six-minute or two-minute average) shall be based on all of the valid observations in the sequential subset of observations selected, and the selected subset shall contain at least 90 percent of the observations possible for the required averaging time. Each required average shall be calculated by summing the opacity value of each of the valid observations in the appropriate subset, dividing this sum by the number of valid observations in the subset, and rounding

the result to the nearest whole number. The number of missing observations in the subset shall be indicated in parenthesis after the subset average value.
[Rule 62-297.401, F.A.C.]

J.13. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) **General Compliance Testing.**

3. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:

a. Did not operate.

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

a. Visible emissions, if there is an applicable standard;

9. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) **Special Compliance Tests.** When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

(c) **Waiver of Compliance Test Requirements.** If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.

[Rule 62-297.310(7), F.A.C.; and, SIP approved]

Reporting and Recordkeeping Requirements

J.14. Test Reports.

- (a) The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- (b) The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- (c) The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed.

[Rule 62-297.310(8), F.A.C.]

Florida Crushed Stone Co (FCS) Brooksville Cement & Power Plants
 0530021-011-AV OGC # 06-0026

(Bruce)

	2006							
	6-Jan	Case opened in OGC notified today by Lea and rec'd our copy of the request by fax						
	10-Jan	Trina asked that I call Fawn Bergen @ Koogler and request a clarification on why the challenge had been filed -- requesting that the reply be by e-mail or hard copy letter						
	11-Jan	Ms. Bergen did reply -- main reason is to allow add'l time for the power Plant (which is under different ownership than the Cement Plant) to review the DRAFT TV permit. With the change of ownership for the power plant, things have been hectic and we wanted to allow those folks time to completely review the document. There are a few items in the permit that we will be commenting on. We will submit comments once the power plant has sufficiently reviewed the document. (end quote)						
	13-Jan	Trina said to go ahead and grant their request for 60 days notified Pat Comer of this and also send her a copy of the response from Fawn Bergen of Koogler						
	17-Jan	Valerie asked that I send her a draft copy of the order to grant -- I had gotten the draft up just in case --- sent it over today						
	18-Jan	Pat issued the order to grant rec'd our copy of same today copies to Trina, Patty, Jeff and Bruce updated notes, list, book and LCT						
		Expiration date is March 6th, 2006						
	27-Feb	One week notice to Bruce						
	3-Mar	Bruce received in a fax copy from Fawn Bergen of Koogler of another request for extension of time....OGC will probably receive the request today also 2nd request -----asked for another 45 days notified Trina of their request Trina, Jeff and Bruce concur that the request will be denied with some days to reply and informed Pat of this by conf. Call probably will receive my copy from Lea on Monday Pat had called Bruce earlier today to see what he wanted to do about their request						

YOUNG VAN ASSENDERP P.A.

ATTORNEYS AT LAW

ATTORNEYS:

TASHA O. BUFORD
DAVID S. DEE
RONALD A. LABASKY
JOHN T. LAVIA, III
PHILIP S. PARSONS
TIMOTHY R. QUALLS
KENZA VAN ASSENDERP
ROBERT SCHEFFEL WRIGHT
ROY C. YOUNG

GALLIE'S HALL
225 SOUTH ADAMS STREET
SUITE 200
POST OFFICE BOX 1833
(ZIP 32302-1833)
TALLAHASSEE, FLORIDA 32301

TELEPHONE: (850) 222-7206
TELECOPIER: (850) 561-6834
April 27, 2006

OF COUNSEL ATTORNEYS:

DANIEL H. COX
DAVID B. ERWIN
JOSEPH W. LANDERS, JR.

GEORGE ANN C. BRACKO
EXECUTIVE DIRECTOR

VIA FACSIMILE & U.S. MAIL (245-2302)

Patricia E. Comer, Esq.
Office of General Counsel
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 35
Tallahassee, Florida 32399-3000

RECEIVED

MAY 01 2006

BUREAU OF AIR REGULATION

Re: Withdrawal of Florida Crushed Stone Company's Petition
for Formal Administrative Hearing--OGC File No. 06-0026

Dear Pat:

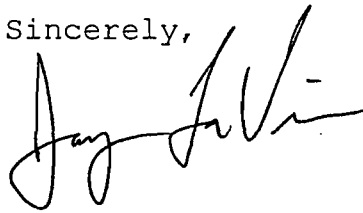
I am writing in my capacity as environmental counsel for Florida Crushed Stone Company ("FCS"). On March 20, 2006, FCS filed a Petition for Formal Administrative Hearing ("Petition") concerning DEP's "Intent to Issue Title V Air Operation Permit Renewal" and the draft Title V Air Operation Permit Renewal (the "Draft Permit") for FCS's Portland cement manufacturing plant, power plant and coal yard in Hernando County. FCS filed the Petition because it had concerns about some of the provisions of the Draft Permit.

As we recently discussed, FCS has worked closely with DEP staff and resolved FCS' concerns about the Draft Permit. Accordingly, FCS hereby withdraws its Petition for Formal Administrative Hearing concerning the Draft Permit (OGC File No. 06-0026).

Patricia E. Comer, Esq.
April 27, 2006
Page 2

Thank you for your assistance and cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. LaVia, III". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

John T. LaVia, III

cc: Charles Allen
Bruce Mitchell, DEP
John Koogler

Gibson, Victoria

From: Gibson, Victoria
Sent: Tuesday, March 21, 2006 12:07 PM
To: Mitchell, Bruce; Koerner, Jeff
Subject: OGC List for March 21st

Attachments: March OGC List .doc

FCS has filed for a hearing.



March OGC List
.doc (57 KB)

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF GENERAL COUNSEL**

3900 Commonwealth Boulevard, M.S. 35
Marjory Stoneman Douglas Building
Tallahassee, Florida 32399-3000

FACSIMILE TRANSMITTAL

To: Vickie Gibson

Fax: 921-9533

From: Lea Crandall

Phone: 245-2212

Pages: 16 Pages Including Cover Date: 3/20/06

RE: Florida Crushed Stone

Comments: _____

Original WILL follow VIA United States Postal Service

Overnight Delivery

Original will NOT follow

The information contained in this facsimile message is attorney privileged and confidential, intended only for the use of individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify sender by telephone and return the original to us at the above address via United States Postal Service.

YOUNG VAN ASSENDERP P.A.**ATTORNEYS AT LAW****ATTORNEYS:**

TASHA O. BUFORD
DAVID S. DEE
RONALD A. LABASKY
JOHN T. LAVIA, III
PHILIP S. PARSONS
TIMOTHY R. QUALLS
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ROBERT SCHEFFEL WRIGHT
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GALLIE'S HALL
225 SOUTH ADAMS STREET
SUITE 200
POST OFFICE BOX 1833
(ZIP 32302-1833)
TALLAHASSEE, FLORIDA 32301

TELEPHONE: (850) 222-7206
TELECOPIER: (850) 561-6834

OF COUNSEL ATTORNEYS:

DANIEL H. COX
DAVID B. ERWIN
JOSEPH W. LANDERS, JR.

GEORGE ANN C. BRACKO
EXECUTIVE DIRECTOR

March 20, 2006

VIA HAND DELIVERY

Lea Crandall, Clerk
Department of Environmental Protection
3900 Commonwealth Boulevard
Room 659
Tallahassee, FL 32399

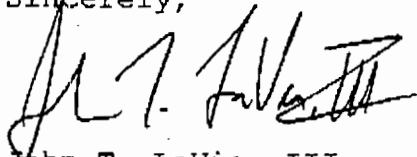
Re: DEP Permit No. 0530021-011-AV
OGC File No. 06-0026

Dear Ms. Crandall:

Enclosed herewith please find a copy of Florida Crushed Stone Company's ("FCS") Petition for Formal Administrative Hearing concerning the above-referenced DEP permit. FCS is filing the Petition to preserve its right to contest several conditions contained in DEP's draft permit. FCS has submitted comments to DEP addressing the conditions in the draft permit and is currently negotiating with DEP staff concerning those comments. While these negotiations are ongoing, FCS does not object to DEP holding the Petition and not forwarding it to the Division of Administrative Hearings.

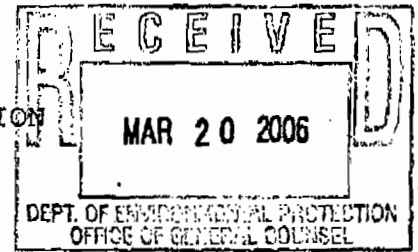
Please call if you have any questions.

Sincerely,



John T. LaVia, III

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



FLORIDA CRUSHED STONE)
COMPANY,)
)
Petitioner,)
)
v.)
)
DEPARTMENT OF ENVIRONMENTAL)
PROTECTION,)
)
Respondent.)

DEP Draft Permit No. 0530021-011-AV
OGC File No. 06-0026

FLORIDA CRUSHED STONE COMPANY'S
PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner, Florida Crushed Stone Company ("FCS"), respectfully submits this petition for a formal administrative hearing, pursuant to the Florida Department of Environmental Protection's Order Denying Second Request for Extension of Time to File Petition for Hearing, and in accordance with Sections 120.569 and 120.57(1), Florida Statutes, and Rule 28-106.201, Florida Administrative Code ("F.A.C."). In support of this petition, FCS says:

The Parties

1. Petitioner, FCS is a Florida corporation. FCS's mailing address is Post Office Box 1508, Brooksville, Florida 34605-1508 and FCS's telephone number is 352-799-7881. For the purposes of this proceeding, all legal papers and correspondence should be served upon FCS's environmental counsel, Mr. David S. Dee. Mr. Dee's address and telephone number are provided below.

2. Respondent, the Florida Department of Environmental Protection (the "Department" or "DEP"), is an agency of the State of Florida. The Department's address is 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-2400. The telephone number for the Department's Office of General Counsel is (850) 245-2242.

Notice of Agency Action

3. FCS previously obtained a Title V permit for an integrated facility that includes a Portland cement manufacturing plant, a power plant and a coal yard (collectively the "Facility"), which is located off Cobb Road approximately two miles northwest of Brooksville in Hernando County, Florida. On April 18, 2005, FCS filed an application with the Department to renew its Title V air operation permit for the Facility. On December 27, 2005, FCS received a copy of DEP's "Intent to Issue Title V Air Operation Permit Renewal" (the "Notice of Intent") and the draft Title V Air Operation Permit Renewal for the Facility (DEP Permit No. 0530021-011-AV) (the "Draft Permit"). The Draft Permit contained a number of provisions that were inconsistent with FCS's application or otherwise inappropriate. Accordingly, on January 4, 2006, FCS requested an extension of time to file a petition for a formal administrative hearing concerning the Draft Permit. By order dated January 18, 2006, the Department granted FCS's request and extended the time for FCS to file a petition for formal administrative

hearing until March 6, 2006.

4. On March 3, 2006, FCS requested a second extension of time to file a petition for formal administrative hearing concerning the Draft Permit. On March 8, 2006, the Department issued an order denying FCS's second request for an extension of time to file a petition for a formal administrative hearing concerning the Draft Permit. The Department's order provides that FCS shall have until March 20, 2006 to file a petition for an administrative hearing in this case. Accordingly, this petition is timely filed.

FCS's Comments Concerning the Draft Permit

5. On March 7, 2006, FCS's consultant, Koogler and Associates, submitted comments ("FCS's Comments") concerning the Draft Permit to the Department. FCS's Comments are attached hereto as Exhibit A and incorporated herein by reference.

FCS's Substantial Interests

6. FCS is the applicant for the Title V air operation permit renewal that is the subject of this petition. As the applicant for the permit renewal, FCS's substantial interests are materially and adversely affected by the Department's proposed action.

Disputed Issues of Material Fact

7. Based on its preliminary review of the Draft Permit, FCS raises the following disputed issues of material fact in this case:

- a. Whether the Draft Permit imposes conditions and limitations on the Facility that are unnecessary, unauthorized, erroneous, or inappropriate.
- b. Whether the Department is acting in an arbitrary or unlawful manner in attempting to impose unnecessary, unauthorized, erroneous and inappropriate conditions in the Draft Permit.
- c. Whether the Department should accept FCS's Comments concerning the Draft Permit and revise the Draft Permit to incorporate FCS's Comments.

8. FCS reserves its right to raise additional disputed issues of material fact that may be identified through discovery in this case.

Ultimate Facts Which Entitle FCS to Relief

9. FCS is entitled to relief in this case because FCS has provided reasonable assurance in its application that the Facility will comply with all applicable Department rules and requirements. The Department's attempt to impose unnecessary, unauthorized, erroneous, and inappropriate conditions in the Draft Permit is arbitrary and unlawful. The Department should modify the Draft

Permit to incorporate FCS's Comments.

Rules and Statutes Entitling FCS to Relief

10. Based on the facts in this case, FCS is entitled to relief pursuant to Chapters 120 and 403, Florida Statutes, and Chapters 28-106, 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.

11. The above-cited provisions of Part 62 of the Florida Administrative Code relate to the Department's authority to issue the Draft Permit and to otherwise regulate the Facility. As such, these rules provide the basis for relief requested by FCS herein.

Relief Requested

WHEREFORE, FCS respectfully requests:

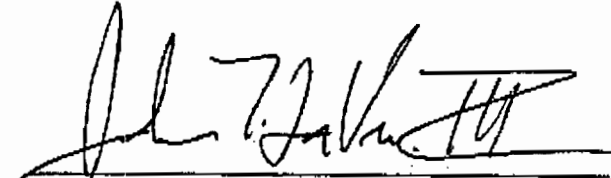
- a. the Department to accept FCS's Comments concerning the Draft Permit and to revise the Draft Permit to be consistent with the FCS's Comments; or alternatively,
- b. the Department to forward this petition to the Division of Administrative Hearings for the assignment of an Administrative Law Judge;
- c. the Administrative Law Judge to conduct a formal administrative hearing pursuant to Sections 120.569 and 120.57(1), Florida Statutes;

d. the Administrative Law Judge to issue a recommended order finding that certain conditions in the Proposed Permit are unnecessary, unauthorized, erroneous, or inappropriate, and finding that FCS has provided reasonable assurance that the Facility will comply with all applicable Department rules and regulations without those conditions; and

e. the Department to issue a final order granting FCS's application for a Title V permit renewal for the Facility without the unnecessary, unauthorized, erroneous or inappropriate conditions.

Respectfully submitted,

YOUNG VAN ASSENDERP



DAVID S. DEE
 Florida Bar No. 281999
 JOHN T. LaVIA, III
 Florida Bar No. 853666
 225 South Adams Street
 Suite 200 (32301)
 Post Office Box 1833
 Tallahassee, Florida 32302
 Phone: 850/222-7206
 FAX: 850/561-6834

ATTORNEYS FOR FLORIDA CRUSHED
 STONE COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Florida Crushed Stone Company's Petition for Formal Administrative Hearing have been furnished by hand delivery to the Clerk's Office, Department of Environmental Protection, 3900 Commonwealth Boulevard, Room 659, Tallahassee, Florida on this 20th day of March, 2006.



Attorney



KA 307-05-04/308-05-03
March 7, 2006

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

Mr. Bruce Mitchell
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, FL 32399-2400

**RE: DRAFT Title V Permit Renewal (Facility ID No. 0530021); Comments
Florida Crushed Stone Company, Brooksville Cement and Power Plants**

Dear Bruce:

Florida Crushed Stone Company and Central Power and Lime (FCS/CPL) have reviewed the DRAFT Title V Permit (DEP Project No. 0530021-011-AV) issued by the Department on December 14, 2005. FCS/CPL are submitting the following comments on the DRAFT permit. The comments are briefly described below and are contained in the attached copy of the DRAFT Title V Permit.

DRAFT Title V Permit

Section I. Subsection A. Facility Description, Page 2

FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. This sentence was revised to reflect this.

Section I. Subsection B. Summary of Emissions Unit ID No(s) and Brief Description(s)

The facility ID numbers and emission unit descriptions have been clarified for EU 009, 010, 014, and 021.

Section I. Subsection B. Page 8

The facility ID numbers and emission unit descriptions have been clarified for EU 009/K-07&L-03, EU 010/L-06 to L-05&L-07, EU 014/Q-17 and EU 021/Q-18.

Exhibit A

Section I. Subsection B. Pages 8-10

The terminology "actual" has been changed to "design" since the flow rates are design flow rates for all emission units. Also "maximum" has been changed to "corresponding to" for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Section I. Subsection B. Page 9

The emission unit descriptions have been clarified for EU 009 (Clinker Cooler Discharge with Baghouse), EU 010 (Clinker Storage Silos with Baghouse), EU 014 (Cement Storage Silos #1 and #2 A-Side Discharge System with Baghouse), and EU 021 (Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse).

Section II. Subsection B. Page 11. Condition B.3., Permitted Capacity

The emission unit descriptions have been clarified for EU 009, 010, 014, and 021.

Section II. Subsection B. Page 12. Condition B.4.

The emission unit name has been revised for the Silo #3 Discharge System.

Section II. Subsection B. Page 12. Condition B.7., Emission Limitations

The emission unit descriptions have been clarified for EU 009, 010, 014, and 021.

Section II. Subsection B. Page 16. Condition B.21(a) and (a)3.

This condition has been revised to reflect two minor editorial comments.

Section II. Subsection D. Page 22. Clinker Receiving/Handling System

FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. The emission unit description was revised to reflect this.

Additionally, Condition D.0. was deleted since the requirement to notify the Department prior to operation of the water spray system (which was proposed in lieu of the Johnston-Marsh of



equivalent dust suppression system) would no longer be required. This requirement was added as a condition of using the water spray system instead of the Johnston-Marsh dust suppression system.

Section II, Subsection D, Page 24, Condition D.14.

The paragraph was revised to reflect a minor editorial change.

Section II, Subsection D, Page 24, Condition D.15.

The page break was removed.

Section II, Subsection D, Page 25, Condition D.19.

The page break was removed.

Section II, Subsection D, Page 26, Condition D.19(c).

The sentence was revised to reflect a minor editorial change.

Section II, Subsection D, Page 28, Condition D.23.

The rule citation was corrected from 62-206 to 62-204, F.A.C.

Section II, Subsection D, Page 30, Condition D.28(c)20.

The page break was removed.

Section II, Subsection D, Page 32

In the emission unit description, the plant design rate has been corrected to 83 TPH (or 1992 TPD). The terminology "actual" has been changed to "design" since the flow rates are design flow rates for all emission units. Also "maximum" has been changed to "corresponding to" for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Section II, Subsection D, Page 33, Condition F.6.b.1.

FCS has deleted "and during times of power plant startup" as compliance was demonstrated under this operating scenario on December 12-13, 2005. There is no reason therefore, to restrict operation under this scenario and condition F.6.b.3. allows for condition F.6.b.1 amendments.

Section II, Subsection D, Page 34, Condition F.7.

The sentence has been clarified to reflect the correct terminology and rate. The preheater feed rate is a parameter that is measured and this is limited by condition F.3. and corresponds to the kiln feed rate of 127 TPH.

Section II, Subsection D, Page 35, Condition F.11.

CPL name was revised.

Section II, Subsection D, Page 37, Condition F.16.

The rule citation "63 CFR 63.1345" was corrected to "40 CFR 63.1345".

Section II, Subsection D, Page 39, Condition F.18, and F.19.

These conditions were revised to allow the use of test methods 6C and 7E for SO₂ and NO_x, respectively. Both method 6C and 7E have been used for compliance for years with Department approval.

Section II, Subsection D, Page 44, Condition F.29.

The sentence was clarified to state that the materials fed to the kiln are continuously measured to estimate clinker production. Clinker is not directly measured due to its high temperature, rather is estimated using the measured amounts of material fed to the preheater.

Section II, Subsection D, Page 44-45, Condition F.31.

This condition states that a mass emissions rate is calculated from a FDEP approved conversion factor in the first sentence and then states in the second sentence that a flow monitor must be used. This condition has been revised to state that a flow monitor or FDEP approved conversion factor can be used. FCS/CPL will be submitting data to support an acceptable conversion factor.

Section II, Subsection D, Page 45, Condition F.32.

A statement was added to allow the use of a flow monitor or a FDEP approved conversion factor. FCS requests to have the references to 40 CFR 60.45 and to 40 CFR 60.13 removed. This is because 40 CFR 60.45 does not apply to cement plants and the NESHAP supersedes the NSPS requirement of 40 CFR 60.13. The reference to 40 CFR 63.1350 is already cited in this condition.



Section II, Subsection D, Page 46, Condition F.39.

The page break was deleted.

Section II, Subsection D, Page 51, Emission Unit Description

The terminology "actual" has been changed to "design" since the flow rates are design flow rates for all emission units. Also "maximum" has been changed to "corresponding to" for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Section II, Subsection I, Page 58, Power Plant Boiler

A minor typographical error was corrected in the emission unit description.

Section II, Subsection I, Page 61, Condition I.7.b.

A minor typographical error was corrected.

Section II, Subsection I, Page 61, Condition I.19.

This condition was revised to allow the use of test method 6C in addition to test method 6 for SO₂. Method 6C has been used for compliance for years with Department approval.

Section II, Subsection I, Page 61, Conditions I.21, I.22, and I.24.

The reference to 40 CFR 60.8 was replaced with 40 CFR 60, Appendix A, since the NSPS does not apply. 40 CFR 60, Appendix A provides the technical requirements without a non-applicable rule reference.

Section II, Subsection I, Page 61, Conditions I.26.

The rule citation for 40 CFR 60.46 was removed since it does not apply.

Section II, Subsection I, Page 62, Condition I.29.

A minor typographical error was corrected.



Section II, Subsection I, Pages 63-64, Condition I.34.

The numbering of this condition was revised.

Section II, Subsection I, Page 65, Condition I.41.

A statement was added to allow the use of a flow monitor or a FDEP approved conversion factor as previously described.

Although the permit contained a requirement to comply with the "applicable" requirements of 40 CFR 60.45 and 60.13, this requirement has proven to be a source of confusion because the power plant is not subject to the New Source Performance Standards (see PA 82-17, June 13, 1983 at 29; BACT Determination, May 20, 1983 at 1). The original reference to these provisions was thus in error. Moreover, as these provisions in fact are not applicable to the plant, the vague reference to the "applicable" parts of these sections creates uncertainty as to what the facility is required to do on a going forward basis with respect to the monitoring equipment. It has been the facility's understanding, based on the history of the facility and prior communications with the FDEP, that the intent of this provision was to require the facility to comply with applicable Florida regulations as well as the performance standards set forth in 40 CFR Part 60 Appendix B. Accordingly, FCS requests, in the interest of clarifying Section I.41., that the reference to the applicable requirements of 40 CFR 60.45 and 60.13 be deleted and that Section I.41. be revised to make it clear that the monitoring devices meet the applicable requirements of Chapter 62-297, F.A.C. and 40 CFR Part 60 Appendix B.

The statement "The permittee shall provide the Department with 30 days notice on each certification." has been removed since FCS provided the required initial certification for SO₂ and opacity in 1991.

Clarification has been added to this permit condition for the certification of each device and to note that this emission unit is not subject to the NSPS.



Statement of Basis**Page 1 of 5**

FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. This sentence was revised to reflect this installation.

Pages 1-3 of 5

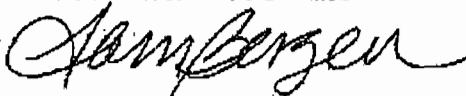
The terminology "actual" has been changed to "design" since the flow rates are design flow rates for all emission units. Also "maximum" has been changed to "corresponding to" for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Page 2 of 5

The emission unit descriptions have been clarified for EU 009 (Clinker Cooler Discharge with Baghouse), EU 010 (Clinker Storage Silos with Baghouse), EU 014 (Cement Storage Silos #1 and #2 A-Side Discharge System with Baghouse), and EU 021 (Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse).

Very truly yours,

KOOGLER & ASSOCIATES



Fawn W. Bergen, P.E.
Project Engineer

FB

Enclosure: Draft Title V Permit Comments
Statement of Basis Comments

cc: C. Allen, FCS
J. Daniel, FCS
H. Eisenberg, Skadden, Arps
J. Koerner, FDEP
R. Moreno, Delta Power
T. Mountain, Coastal Engineering
B. Noble, Delta Power
S. Rahman, Delta Power
M. Vardeman, Rinker



Gibson, Victoria

From: Gibson, Victoria
Sent: Wednesday, March 08, 2006 3:01 PM
To: Koerner, Jeff
Subject: FCS

Hi,

Pat Comer has issued the denial for Florida Crushed Stone today. They have until 3/20 to reply on 0530021-011-AV.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA CRUSHED STONE COMPANY,
BROOKSVILLE CEMENT AND POWER PLANTS,

Petitioner,

vs.

OGC No. 06-0026
DEP Permit 0530021-011-AV

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

**ORDER DENYING SECOND REQUEST FOR
EXTENSION OF TIME TO FILE PETITION FOR HEARING**

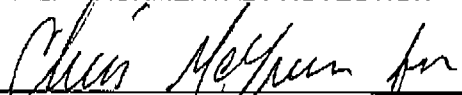
This cause has come before the Florida Department of Environmental Protection (Department) on receipt of a second request made by Petitioner, Florida Crushed Stone Company, to grant an additional 45-day extension of time to file a petition for administrative hearing to allow time to provide certain information to the FDEP on several specific permit conditions for its facility in Hernando County, Florida. Petitioner was previously granted a 60-day extension on this matter. The second request for extension of time provides no information beyond that recited herein and no information other than that provided by the Petitioner's first request for extension. Because the request fails to show good cause for the extension of time,

IT IS ORDERED:

The request for a second extension of time to file a petition for administrative proceeding is DENIED. The Petitioner shall have until **March 20, 2006**, to file a petition in this matter. Filing shall be complete upon receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 14 day of March, 2006, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard MS - 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

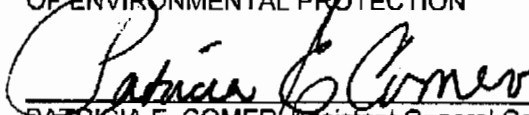
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
 U. S. Mail facsimile only, this 8th day of March, 2006, to:

Fawn W. Bergen, P.E
Koogler & Associates, Inc.
4014 N.W. 13th Street
Gainesville, FL 32609

facsimile: 352-377-5822

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



PATRICIA E. COMER, Assistant General Counsel
FL Bar 0224146
Department of Environmental Protection
3900 Commonwealth Boulevard – MS 35
Tallahassee, Florida 32399-3000
Telephone: (850) 245-2288
Facsimile: (850) 245-2302

with a courtesy copy to:

Trina L. Vielhauer, Chief
Bureau of Air Regulation

facsimile: 850-921-9533



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 308-05-03

March 3, 2006

Teri Donaldson, Esquire
Office of General Counsel
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Second Extension of Time to File a Petition
Florida Crushed Stone Company
Brooksville Cement and Power Plants, Hernando County
DEP File No. 0530021-011-AV

Dear Ms. Donaldson:

Attached is a request for a second extension of time to file for a hearing in accordance with Rule 28-106, FAC.

Mr. Bruce Mitchell, the permitting engineer, has been notified of this extension.

If you have any questions concerning this request, please do not hesitate to contact me.

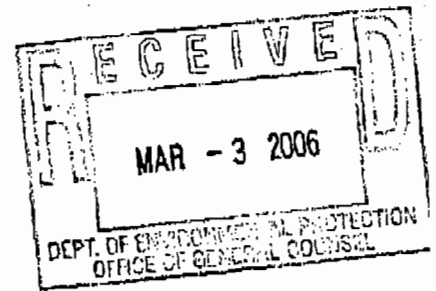
Very truly yours,

KOOGLER & ASSOCIATES

Fawn W. Bergen, P.E.

FWB
Encl.

C: J. Daniel, FCS Brooksville
B. Mitchell, FDEP
M. Vardeman, Rinker



STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

Florida Crushed Stone Company
PO Box 1508
Brooksville, Florida 34605

FDEP File No. 0530021-011-AV

MOTION FOR EXTENSION OF TIME

The Applicant, Florida Crushed Stone Company, by and through its undersigned Engineer of Record and pursuant to Rule 28-106, FAC, requests the Secretary of FDEP to grant a 45-day second extension of time in which to file a petition. This will allow submittal of additional information to FDEP on the permit application review and allow time to resolve issues of concern.

Dated the 3rd day of March, 2006, in Gainesville, Alachua County, Florida.

Koogler & Associates, Inc.
Environmental Services

Fawn W. Bergen, P.E.
Engineer of Record
Florida Registration No. 61614
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Teri Donaldson, Office of the General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and Mr. Bruce Mitchell, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399, Mr. Michael Vardeman, Rinker Materials Corporation, 1200 NW 137th Avenue, Miami, Florida 33182, and Mr. James Daniel, Florida Crushed Stone Company, PO Box 1508, Brooksville, Florida 34605, by FAX and by UPS, this 3rd day of March, 2006.



Fawn W. Bergen, P.E.

Florida Registration No. 61614



**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF GENERAL COUNSEL**

3900 Commonwealth Boulevard, M.S. 35
Marjory Stoneman Douglas Building
Tallahassee, Florida 32399-3000

FACSIMILE TRANSMITTAL

To: Vickie Gibson

Fax: 921-9533

From: Lea Crandall

Phone: 245-2212

Pages: 4 Pages Including Cover

Date: 3/6/06

RE: Florida Rock

Comments: _____

Original WILL follow VIA United States Postal Service

Overnight Delivery

Original will NOT follow

The information contained in this facsimile message is attorney privileged and confidential, intended only for the use of individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify sender by telephone and return the original to us at the above address via United States Postal Service.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**FLORIDA CRUSHED STONE COMPANY,
BROOKSVILLE CEMENT AND POWER PLANTS,**

Petitioner,

vs.

**OGC #06-0026
DEP Permit 0530021-011-AV**

DEPARTMENT OF ENVIRONMENTAL
PROTECTION,

Respondent.

**ORDER GRANTING REQUEST FOR EXTENSION
OF TIME TO FILE PETITION FOR HEARING**


This cause has come before the Florida Department of Environmental Protection upon receipt of a request made by Petitioner, Florida Crushed Stone Company, to grant an extension of time to file a petition for an administrative hearing to allow time to provide certain information to the FDEP on several specific permit conditions for its facility in Hernando County, Florida. Because the request shows good cause for the extension of time,

IT IS ORDERED:

The request for an extension of time to file a petition for administrative proceeding is granted. Petitioner shall have until **March 6, 2006**, to file a petition in this matter. Filing shall be complete upon receipt by the Office of General Counsel, Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000.

DONE AND ORDERED on this 18th day of January, 2006, in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



JACK CHISOLM, Deputy General Counsel
3900 Commonwealth Boulevard, M.S. 35
Tallahassee, Florida 32399-3000
850-245-2242 facsimile 850-245-2302

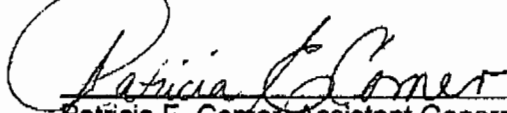
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via
_ U. S. Mail _ facsimile _ **only**, this 18th day of January, 2006, to:

Fawn W. Bergen, P.E
Koogler & Associates, Inc.
4014 N.W. 13th Street
Gainesville, FL 32609

facsimile: 352-377-5822

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Patricia E. Comer, Assistant General Counsel

FL Bar 0224146
Department of Environmental Protection
3900 Commonwealth Boulevard – MS 35
Tallahassee, Florida 32399-3000
Telephone: (850) 245-2288
Facsimile: (850) 245-2302

with a courtesy copy to:

Trina L. Vielhauer, Chief
Bureau of Air Regulation

facsimile: 850-921-9533

Gibson, Victoria

From: Comer, Patricia
Sent: Tuesday, January 17, 2006 12:06 PM
To: Gibson, Victoria
Subject: RE: Florida Crushed Stone -- Extension of time

I can access LCT, thanks. I just don't have any documents or any file yet for FI Crushed Stone probably because it takes a while from something opening a case being received by the clerk's office on the sixth floor to us getting a file opened and assigned here on three. If Valerie has the order draft all's fine.

Thanks
Pat

From: Gibson, Victoria
Sent: Tuesday, January 17, 2006 11:49 AM
To: Comer, Patricia
Subject: RE: Florida Crushed Stone -- Extension of time

Okay, I did send over to Valerie this morning the draft order to grant for FCS. Are you able to access LCT yet? If not, I will fax you a copy of that screen as well. What is your fax #?

Vickie

From: Comer, Patricia
Sent: Tuesday, January 17, 2006 11:40 AM
To: Gibson, Victoria
Subject: RE: Florida Crushed Stone -- Extension of time

/Vickie
Can you send what you have? I don't have any case file yet. Thanks
Pat

From: Gibson, Victoria
Sent: Friday, January 13, 2006 1:27 PM
To: Comer, Patricia
Subject: Florida Crushed Stone -- Extension of time

Hi,

I just so happen to have this draft order to grant ready to go on 0530021-011-AV; so if it is of any help to you or Valerie.....let me know and I will e-mail over to you.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

Gibson, Victoria

From: Gibson, Victoria
Sent: Tuesday, January 17, 2006 9:38 AM
To: Miskelley, Valerie
Subject: RE: Florida Crushed Stone

Attachments: Ord Grant FCS.doc

Yes, I have drafted this order; just in case. Here it is attached for your convenience:



Ord Grant FCS.doc
(34 KB)

I used Jack's signature line so you'll probably need to change one or all of those.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

From: Miskelley, Valerie
Sent: Tuesday, January 17, 2006 9:26 AM
To: Gibson, Victoria
Subject: RE: Florida Crushed Stone

Vickie,
Pat thought maybe you had already drafted the order granting the extension of time. If you have, could you email it to me so we can send it. If not, let me know and I will draft it.

Thanks,
Valerie

-----Original Message-----

From: Gibson, Victoria
Sent: Friday, January 13, 2006 1:12 PM
To: Comer, Patricia
Cc: Miskelley, Valerie; Vielhauer, Trina
Subject: Florida Crushed Stone
Importance: High

Good afternoon.

Trina wishes to grant the extension of time request on the following facility:

Florida Crushed Stone -- Brooksville Cement and Power Plants

0530021-011-AV OGC # 06-0026

60 days requested; which will be fine to grant as an extension of time

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, January 13, 2006 1:26 PM
To: Mitchell, Bruce
Subject: FCS -- Extension of time

Hi,

Would you please provide the name, title and fax # for the R.O. on permit # 0530021-011-AV?

I will be sure to have him receive a copy of the extension of time.....or if there is someone else you would like to receive a copy; just let me know.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, January 13, 2006 1:14 PM
To: Comer, Patricia
Cc: Vielhauer, Trina; Miskelley, Valerie
Subject: FW: Florida Crushed Stone--Request for Extension
Importance: High

Pat and Valerie,

Attached is an e-mail that needs to be part of your file on FCS 0530021-011-AV

Have a great long weekend!!!

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

From: Gibson, Victoria
Sent: Wednesday, January 11, 2006 11:44 AM
To: 'fbergen@kooglerassociates.com'
Subject: RE: Florida Crushed Stone--Request for Extension

Thank you very much for your reply.

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

From: Fawn Bergen [mailto:fbergen@kooglerassociates.com]
Sent: Wednesday, January 11, 2006 11:04 AM
To: Gibson, Victoria
Cc: 'John Koogler'; 'Vardeman, Mike'; 'Daniel, James S.'
Subject: Florida Crushed Stone--Request for Extension

Hi Ms. Gibson-

I received your message yesterday (at Trina Vilhauer's request) about the reasoning for our request for an extension for the DRAFT Title V permit renewal project. The main reason that we have requested an extension is to allow additional time for the Power Plant (which is under different ownership than the Cement Plant) to review the DRAFT Title V permit. With a change of ownership for the power plant, things have been hectic and we wanted to allow those folks time to completely review the document. There are a few items in the permit that we will be commenting on. We will submit comments once the Power Plant has sufficiently reviewed the document.

Please let me know if there are further questions.

Regards,

Fawn W. Bergen, PE
Project Engineer
Koogler & Associates, Inc.
4014 NW 13th Street
Gainesville, FL 32609
(352)377-5822 x29
(352)377-7158 fax
fbergen@kooglerassociates.com

Gibson, Victoria

From: Gibson, Victoria
Sent: Friday, January 13, 2006 1:12 PM
To: Comer, Patricia
Cc: Miskelley, Valerie; Vielhauer, Trina
Subject: Florida Crushed Stone

Importance: High

Good afternoon.

Trina wishes to grant the extension of time request on the following facility:

Florida Crushed Stone -- Brooksville Cement and Power Plants

0530021-011-AV . OGC # 06-0026

60 days requested; which will be fine to grant as an extension of time

Vickie

Victoria Gibson, Administrative Secretary for
Trina Vielhauer, Chief
DEP/Bureau of Air Regulation
victoria.gibson@dep.state.fl.us
850-921-9504 fax 850-921-9533

Gibson, Victoria

From: Fawn Bergen [fbergen@kooglerassociates.com]
Sent: Wednesday, January 11, 2006 11:04 AM
To: Gibson, Victoria
Cc: 'John Koogler'; 'Vardeman, Mike'; 'Daniel, James S.'
Subject: Florida Crushed Stone--Request for Extension

Hi Ms. Gibson-

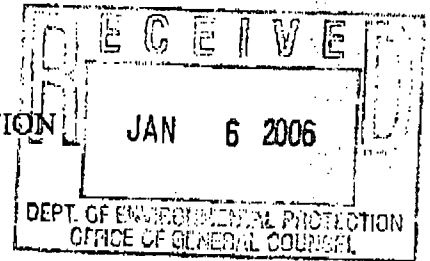
I received your message yesterday (at Trina Vilhauer's request) about the reasoning for our request for an extension for the DRAFT Title V permit renewal project. The main reason that we have requested an extension is to allow additional time for the Power Plant (which is under different ownership than the Cement Plant) to review the DRAFT Title V permit. With a change of ownership for the power plant, things have been hectic and we wanted to allow those folks time to completely review the document. There are a few items in the permit that we will be commenting on. We will submit comments once the Power Plant has sufficiently reviewed the document.

Please let me know if there are further questions.

Regards,

Fawn W. Bergen, PE
Project Engineer
Koogler & Associates, Inc.
4014 NW 13th Street
Gainesville, FL 32609
(352)377-5822 x29
(352)377-7158 fax
fbergen@kooglerassociates.com

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION



In the Matter of an Application
for Air Permit by

Florida Crushed Stone Company
PO Box 1508
Brooksville, Florida 34605

FDEP File No. 0530021-011-AV

MOTION FOR EXTENSION OF TIME

The Applicant, Florida Crushed Stone Company, by and through its undersigned Engineer of Record and pursuant to Rule 28-106, FAC, requests the Secretary of FDEP to grant a 60-day extension of time in which to file a petition. This will allow submittal of additional information to FDEP on the permit application review and allow time to resolve issues of concern.

Dated the 4th day of January, 2006, in Gainesville, Alachua County, Florida.

Koogler & Associates, Inc.
Environmental Services

A handwritten signature in cursive script that reads "Fawn W. Bergen".

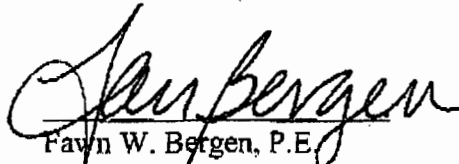
Fawn W. Bergen, P.E.
Engineer of Record
Florida Registration No. 61614
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822



7/14

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Teri Donaldson, Office of the General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and Mr. Bruce Mitchell, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399, Mr. Michael Vardeman, Rinker Materials Corporation, 1200 NW 137th Avenue, Miami, Florida 33182, and Mr. James Daniel, Florida Crushed Stone Company, PO Box 1508, Brooksville, Florida 34605, by FAX and by UPS, this 4th day of January, 2006.


Fawn W. Bergen, P.E.
Florida Registration No. 61614



**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF GENERAL COUNSEL**

3900 Commonwealth Boulevard, M.S. 35
Marjory Stoneman Douglas Building
Tallahassee, Florida 32399-3000

FACSIMILE TRANSMITTAL

To: Vickie Gibson

Fax: 921-9533

From: Lea Crandall

Phone: 245-2212

Pages: 3 Pages Including Cover Date: January 6, 2006

RE: Florida Crushed Stone Company

Comments:

Original WILL follow VIA United States Postal Service
 Overnight Delivery
Original will NOT follow

The information contained in this facsimile message is attorney privileged and confidential, intended only for the use of individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify sender by telephone and return the original to us at the above address via United States Postal Service.

Gibson, Victoria

From: Crandall, Lea
Sent: Friday, January 06, 2006 10:43 AM
To: Chisolm, Jack; Light, Lisa; Gibson, Victoria
Subject: Request for Extension of Time rec'd. - 0530021-011-AV - Florida Crushed Stone

FYI, a Request for Extension of Time was rec'd. today re: 0530021-011-AV - Florida Crushed Stone.

Thanks,

Lea Crandall

Agency Clerk
Department of Environmental Protection
3900 Commonwealth Boulevard, MS 35
Tallahassee, FL 32399-3000
Phone: (850) 245-2212 SC: 205-2212
Fax: (850) 245-2303

Chronology of Activities

OGC Number **06 0026 27 AV** District **SOUTHWEST** County **HERNANDO**

Style of Case **FLORIDA CRUSHED STONE COMPANY VS. DEP**

Program Area **AIR TITLE V** Mode **ADMINISTRATIVE**

Lead Attorney **PATRICIA E COMER** Status **OPEN**

Forum Name _____ Forum Case Number _____

Permit Appl **0530021-011-AV** Final Order Number _____

Date *	Code	Activity Description
01/06/2006	AA	ASSIGNED TO LEAD ATTORNEY JACK J CHISOLM
01/06/2006	ACO	ADMIN. CASE OPENED IN OGC
01/06/2006	REX1	RECEIVED FIRST REQUEST FOR EXTENSION OF TIME
01/09/2006	AR	RE-ASSIGNED TO LEAD ATTORNEY PATRICIA E COMER
01/18/2006		ORDER GRANTING REQ FOR EXTENSION OF TIME TO FILE PETITION
01/18/2006		FOR HEARING DUE 03/06/06.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 307-05-04

January 4, 2006

RECEIVED

JAN 05 2006

BUREAU OF AIR REGULATION

Teri Donaldson, Esquire
Office of General Counsel
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Motion for Extension of Time to File a Petition
Florida Crushed Stone Company
Brooksville Cement and Power Plants, Hernando County
DEP File No. 0530021-011-AV

Dear Ms. Donaldson:

Attached is a request for an extension of time to file for a hearing in accordance with Rule 28-106, FAC.

Mr. Bruce Mitchell, the permitting engineer, has been notified and has no objections to this extension.

If you have any questions concerning this request, please do not hesitate to contact me.

Very truly yours,

KOGLER & ASSOCIATES

Fawn W. Bergen, P.E.

FWB
Encl.

C: J. Daniel, FCS Brooksville
B. Mitchell, FDEP
M. Vardeman, Rinker

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of an Application
for Air Permit by

Florida Crushed Stone Company
PO Box 1508
Brooksville, Florida 34605

FDEP File No. 0530021-011-AV

MOTION FOR EXTENSION OF TIME

The Applicant, Florida Crushed Stone Company, by and through its undersigned Engineer of Record and pursuant to Rule 28-106, FAC, requests the Secretary of FDEP to grant a 60-day extension of time in which to file a petition. This will allow submittal of additional information to FDEP on the permit application review and allow time to resolve issues of concern.

Dated the 4th day of January, 2006, in Gainesville, Alachua County, Florida.

Koogler & Associates, Inc.
Environmental Services

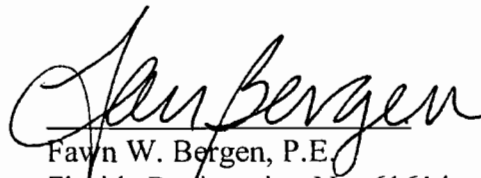


Fawn W. Bergen, P.E.
Engineer of Record
Florida Registration No. 61614
4014 N.W. 13th Street
Gainesville, FL 32609
(352) 377-5822



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to Teri Donaldson, Office of the General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, and Mr. Bruce Mitchell, FDEP, 2600 Blair Stone Road, Tallahassee, Florida 32399, Mr. Michael Vardeman, Rinker Materials Corporation, 1200 NW 137th Avenue, Miami, Florida 33182, and Mr. James Daniel, Florida Crushed Stone Company, PO Box 1508, Brooksville, Florida 34605, by FAX and by UPS, this 4th day of January, 2006.


Fawn W. Bergen, P.E.
Florida Registration No. 61614

