



Department of Environmental Protection

Lawton Chiles
Governor

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

Virginia B. Wetherell
Secretary

August 8, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph J. Piermatteo
Senior Vice President
Central Power & Lime, Inc.
10311 Cement Plant Road
Brooksville, Florida 34601

Dear Mr. Piermatteo:

Re: Amendments to PSD-FL-090
Boiler Heat Input Increase From 1000 to 1,850 MMBTU/hr

The Department received your application on March 15, 1995, for amendment of the subject air construction permit allowing an increase to 1,850 MMBTU/hr in the boiler firing rate. The permit is amended as shown:

Specific Condition A.1.c.:

FROM: c. Particulates - 0.03 lb. per million Btu heat input, averaging time per 40 CFR 60.46.

TO: c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr), averaging time per 40 CFR 60.46. ✓

Specific Condition A.1.d.:

FROM: d. Visible emissions - 20% opacity, 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

TO: d. Visible emissions - 10% opacity, 6-minute average, except for one 6-minute period per hour of not more than 17% opacity. ✓

Specific Condition A.2.c.:

FROM: c. Particulates - 0.03 lb. per million Btu heat input plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46.

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TO: c. PM/PM10 - 0.0135 lb per MMBTU (25.0 lbs per hour at 1,850 MMBTU/hr) plus 0.3 lb from the cement kiln and 0.1 lb from the clinker cooler per ton of kiln feed (dry basis), averaging time per 40 CFR 60.46. ✓

Specific Condition C.6.:

FROM: 6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal used, material fed to the kiln, and clinker produced. The records of fuel usage with the fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Florida Department of Environmental Regulation Southwest District office.

TO: 6. Instruments shall be installed, calibrated, and maintained to continuously measure the amounts of coal and limestone used in the boiler, material fed to the kiln, and clinker produced. The records of coal and limestone used in the boiler, fuel analysis, daily kiln feed and clinker produced shall be reported quarterly to the Department's Southwest District office. ✓

Specific Condition G.1.:

FROM: 1. When the power plant boiler is operating alone and the cement plant is not in operation, the maximum heat input rate of the boiler shall not exceed the site specific limit of 1,000 million Btu per hour, maximum three-hour average.

TO: 1. The heat input rate of the boiler, with or without the cement plant operating, shall not exceed the maximum necessary to produce 150 MW of power and shall in no case exceed 1,850 MMBTU/hr, maximum three-hour average. ✓

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes (F.S.). The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the applicant of the amendment request/application and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of the amendment issuance or within 14 days of their receipt of this amendment, whichever occurs first. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, F.S.

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The Petition shall contain the following information:

- (a) The name, address and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and,
- (g) A statement of the relief sought by petitioner, stating precisely the action the petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the amendment request/application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, Florida Administrative Code.

A copy of this amendment letter shall be attached to and shall become a part of Air Construction Permit PSD-FL-090.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION


SIR Virginia B. Wetherell, Secretary

Mr. Joseph J. Piermatteo
August 8, 1995
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CERTIFICATE OF SERVICE

This is to certify that this Permit Amendment and all copies were mailed to the listed persons before the close of business on

8-15-95.

FILING AND ACKNOWLEDGEMENT FILED,
on this date, pursuant to Chapter
120.52(9), Florida Statutes, with
with the designated Deputy Clerk,
receipt of which is hereby
acknowledged.

Karin Jones 8-15-95
(Clerk) (Date)

cc: B. Thomas, SWD
J. Harper, EPA
J. Bunyak, NPS
H. Oven, PPS
C. Hetrick, HCBCC



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

RECEIVED
OCT 6 1995

KA 307-93-12
October 2, 1995

Bureau of
Air Regulation

Mr. Clair H. Fancy
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Central Power & Lime, Inc.
Comments on Permit Amendment for
Boiler Heat Input Increase
PSD-FL-090, PA 82-17D

Dear Mr. Fancy:

We received the above referenced amendment on September 26, 1995. The comments mentioned below are provided simply to clarify two items in FDEP's amendment document. Further action on the part of the Department is neither expected nor necessary.

1. Specific Condition G.1. As reflected in the application and subsequent correspondence and our meetings, the power generation rate for the project is 150 MW, net delivered.
2. Project Description It should be noted that the additional modification request in March 1995 was for a second cement kiln, not lime kiln.

If you have any questions, please call Pradeep Raval or me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:par

c: H. Oven, PPS
T. Mountain, CPL
L. Curtin, Holland & Knight



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

April 5, 1995

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

Dear Mr. Mountain:

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

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

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

Sincerely,

W. A. Proses
Air Compliance Supervisor

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

Power Plant

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

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

Very truly yours,

KOOGLER & ASSOCIATES


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

JBK:wa
Enc.

c: Mr. Joe Piermatteo, FCS
Mr. Bryan Adkins, FCS
Mr. Charles Allen, FCS



In proposing amended compliance test requirements, we looked at the planned operating schedule of the FCS/CPL cement plant and power plant. Annually, the cement plant is scheduled for a 7-10 day outage for maintenance, normally during the last quarter of the calendar year. With the power plant, there is a planned outage of approximately six weeks every two years for maintenance. The next power plant outage is scheduled for March 1998.

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

Combined Cement Plant/Power Plant Operation

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

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

All emission testing should be performed at the main plant stack during a period when the cement plant, clinker cooler, raw mill and limestone dryer are operating simultaneously and under normal operating conditions (as currently defined in Specific Condition No. 23 of Permit A027-231888A), and when the power plant is operating under normal operating conditions and within 90-100 percent of the rate defined in Specific Condition G.1. of PSD-FL-090 as amended August 8, 1995.

Note 1: The note pertaining to the operation of the limestone dryer included as part of Specific Condition 19 of Permit A027-231888A should be incorporated here.

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

Cement Plant

- Test the main plant stack emissions for the following pollutants every two years during the scheduled outage of the CPL power plant: (the remainder of Specific Condition 19 of Permit A027-231888A should be incorporated here).



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

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

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

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

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

[Emphasis added]

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





KOUGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 307-97-07

September 2, 1997

RECEIVED

SEP 05 1997

Department of Environmental Protection
SOUTHWEST DISTRICT

BY _____

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

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

Dear Mr. Zell:

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

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

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

TO: A. Linero & Scott Sheplak

FROM: J. Kissel *JK*

DATE: September 10, 1997

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

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

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

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

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

RECEIVED

SEP 17 1997

BUREAU OF
AIR REGULATION

c:\fcs997

Date: 9/17/97 5:16:51 PM
From: Alvaro Linero TAL
Subject: Testing Requirements at Florida Crushed Stone & Central Power and Lime
To: Mike Harley TAL
To: John Reynolds TAL
CC: Gerald Kissel TPA
CC: Scott Sheplak TAL

Please look over a letter (which should be on your desks shortly) from John Koogler regarding how to test these two plants which operate in an integrated mode but have separate limits. Is what Koogler proposes within the rules? Do they need a Site Certification/PSD/AC permit amendment? Would it be an ASP? What do you suggest?

Is what the SWD proposes to do O.K? I.E. waiver or delay of compliance tests of cement plant (when operating alone). The letter looks like a permit modification request of some kind so it looks like it is on a clock. We need to approve it or deny it or ask for more information soon. Please advise Gerry Kissel ASAP if you see any problems.