

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 22, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Mountain, Environmental Manager
Central Power & Lime, Inc.
Post Office Box 1508
Brooksville, Florida 34605-1508

Dear Mr. Mountain:

Re: Request for Alternate Procedures and Requirements
Florida Crushed Stone Company
AC 27-091426, 27, 29, 30, 32 & 33

The Department has reviewed Dr. John Koogler's letter with enclosures received December 24, 1990, which requested that the above referenced sources be allowed to demonstrate compliance using a visible emission standard (not greater than 5% opacity) in lieu of conducting a mass emissions test for particulate matter. Since all of the sources are minor and are each equipped with a baghouse control system, the Department is in agreement with the request pursuant to F.A.C. Rule 17-2.700(3)(d). Therefore, and based on a phone conversation with Dr. Koogler on January 15, 1991, the following will be changed and added:

AC 27-091426 and 27 - Specific Condition No. 2:

FROM: Particulate matter emissions shall not exceed 0.77 pounds per hour or 3.04 tons per year (0.015 grains per actual cubic foot). An initial compliance test using EPA Method 5 shall be submitted to DER's Southwest District office within 45 days after completion of the tests.

TO: Particulate matter emissions shall not exceed 0.77 pounds per hour or 3.04 tons per year (0.015 grains per actual cubic foot). Compliance tests using EPA Method 5 shall be submitted to the DER's Southwest District office within 45 days after completion of the tests. In lieu of conducting compliance tests for particulate matter, the source is subject to the standards of F.A.C. Rule 17-2.700(3)(d), Exception and Approval of Alternate Procedures and Requirements.

Mr. Tom Mountain
January 22, 1991
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AC 27-091429 - Specific Condition No. 2:

FROM: Particulate matter emissions shall not exceed 1.16 pounds per hour or 4.56 tons per year (0.015 grains per actual cubic foot). An initial compliance test using EPA Method 5 shall be submitted to DER's Southwest District office within 45 days after completion of the tests.

TO: Particulate matter emissions shall not exceed 1.16 pounds per hour or 4.56 tons per year (0.015 grains per actual cubic foot). Compliance tests using EPA Method 5 shall be submitted to the DER's Southwest District office within 45 days after completion of the tests. In lieu of conducting compliance tests for particulate matter, the source is subject to the standards of F.A.C. Rule 17-2.700(3)(d), Exception and Approval of Alternate Procedures and Requirements.

AC 27-091430, 32 and 33 - Specific Condition No. 2:

FROM: Particulate matter emissions shall not exceed 0.64 pounds per hour or 2.53 tons per year (0.015 grains per actual cubic foot). An initial compliance test using EPA Method 5 shall be submitted to DER's Southwest District office within 45 days after completion of the tests.

TO: Particulate matter emissions shall not exceed 0.64 pounds per hour or 2.53 tons per year (0.015 grains per actual cubic foot). Compliance tests using EPA Method 5 shall be submitted to the DER's Southwest District office within 45 days after completion of the tests. In lieu of conducting compliance tests for particulate matter, the source is subject to the standards of F.A.C. Rule 17-2.700(3)(d), Exception and Approval of Alternate Procedures and Requirements.

AC 27-091426, 27, 29, 30, 32 and 33:

Specific Condition No. 3:

FROM: There shall be no visible emissions (five percent opacity).

TO: Visible emissions shall not exceed 5% opacity pursuant to F.A.C. Rule 17-2.700(3)(d).

Mr. Tom Mountain
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Specific Condition No. 4:

FROM: Compliance with the visible emission standards shall be demonstrated in accordance with DER Method 9, FAC Rule 17-2.700(6)(2)9.

TO: Compliance with the visible emission standards shall be demonstrated using EPA Method 9, in accordance with F.A.C. Rule 17-2.700 and 40 CFR 60, Appendix A.

Specific Condition No. 7:

FROM: If the source meets Specific Condition No. 2, subsequent compliance tests may be done by EPA Method 9 in accordance with Rule 17-2.700(1)(d)6, FAC.

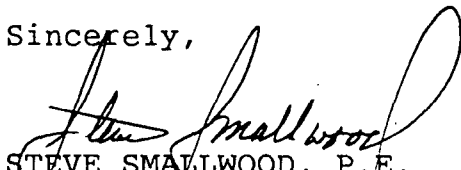
TO: The source is subject to all applicable standards of F.A.C. Chapters 17-2 and 17-4 and 40 CFR 60 (July, 1989 version).

Attachment to be Incorporated:

- o Dr. John B. Koogler's letter with enclosures received December 24, 1990.

This letter shall be attached to the above referenced construction permits and shall become a part of the permits.

Sincerely,


STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/BM/plm

Attachment

c: B. Thomas, SW Dist.
J. Koogler, P.E., K&A



KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

KA 307-86-04

December 21, 1990

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

Dear Mr. Fancy:

Central Power & Lime, Inc. requests that the six construction permits (AC27-091426, AC27-091427, AC27-091429, AC27-091430, AC27-091432, and AC27-091433) for the CPL Lime Plant in Brooksville, Florida, be modified to reflect the following amendments:

Specific Condition No. 2

FROM: Particulate matter emissions An initial compliance test using EPA Method 5 shall be submitted to DER's Southwest District office within 45 days after completion of the test.

TO: Particulate matter emissions An initial compliance test using EPA Method 9 shall be submitted to DER's Southwest District office within 45 days after completion of the test.

Specific Condition No. 7

FROM: If the source meets Specific Condition No. 2, subsequent compliance tests may be done by EPA Method 9 in accordance with Rule 17-2.700(1)9(d)6, FAC.

TO: Visible emissions shall not be greater than 5 percent opacity as demonstrated in accordance with DER Method 9 (Rule 17-2.700(6)(a)9, FAC.

The reasons for these modifications are best explained in my letter of October 22, 1990, to David Zell of your Southwest District Office. Please refer to the attached copy of this letter. Also included in this package is a copy of all the correspondence from the Southwest District Office pertaining to this matter.

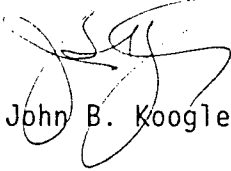
Mr. Clair Fancy
Florida Department
of Environmental Regulation

December 21, 1990
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As usual, if you have any questions, please feel free to contact me.

Very truly yours,

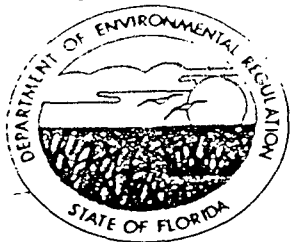
KOGLER & ASSOCIATES


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

JBK:wa
Enc.

cc: Mr. J. Pennington, FDER-Tallahassee
Mr. David Zell, FDER-Tampa
Mr. Tom Mountain, FCS CPL
B. Mitchell
B. Thomas, SW Dist





Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5500

Bob Martinez, Governor

Dale Twachmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

RECEIVED
October 29, 1990

DEC 24 1990

DER-BAQIM

Mr. Tom Mountain
Environmental Manager
Central Power & Lime, Inc.
P.O. Box 1508
Brooksville, FL 34605-1508

Dear Mr. Mountain:

Re: Hernando County - AP
AO27-186140 to 141 and 186143 thru 146
Lime Plant Operation Permits

Based on questions raised in our letter of October 3, 1990 and the response letter of October 22, 1990 from your consultant, Koogler & Associates, the Southwest District Office has made the following determinations:

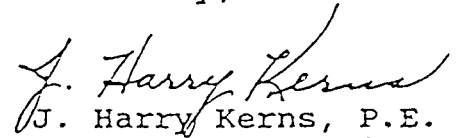
1. Construction permit No. AC27-091430 for Lime Storage Silo B should be voided as this source has not been, nor will it be, constructed. This action must be done by the DER - Tallahassee, Central Air Permitting Section because they issued the original construction permit.
2. Indications are that the limestone dryer discharge transfer point, with particulate emissions controlled by the baghouse originally intended for Limestone Storage Silo B, is operating without a permit. An application for this source must be submitted to DER-Tallahassee and an after-the-fact construction permit obtained.
3. Any waiver of particulate compliance testing requirements pursuant to Rule 17-2.700(3)(d) must be approved by, and obtained from, DER-Tallahassee where the original permits were issued. While the above rule does allow the District Manager to waive the particulate test requirement, the Rule states that waiver shall be specified in the permit issued to the source. The construction permits for the lime plant sources specifically call for an initial EPA Method 5 compliance test (Specific Condition No. 2) and go on to say that subsequent compliance tests may be done by Method 9 VE tests (Specific Condition No. 7). In order to change this requirement and allow the waiver, the original construction permits must be amended.

In order for the Southwest District Office to continue processing the operation permit applications, the above issues must be resolved and finalized. Therefore, Central Power & Lime shall submit a request for the desired changes along with the appropriate application information, to the Central Air Permitting Section at the DER-Tallahassee office. Copies of all correspondence and applications should also be sent to the Air Section of the Southwest District Office of the Department. The applicant shall notify the Air Section of the Southwest District Office when resolution is complete in order to trigger the resumption of processing of the operation permit applications.

"Notice: Pursuant to the provisions of Section 120.600, F.S. and Subsection 17-12.070(5), F.A.C., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. You need to respond within 30 days after you receive this letter, responding to as many of the information requests as possible and indicating when a response to any unanswered questions will be submitted. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. Or for operating permits, you should develop a specific time table for the submission of the requested information for Department review and consideration. Failure to comply with a time table accepted by the Department will be grounds for the Department to issue a Final Order for Denial for lack of timely response. A denial for lack of information or response will be unbiased as to the merits of the application. The applicant can reapply as soon as the requested information is available."

If you have any questions, please call David Zell of my staff at (813) 623-5561 extension 416.

Sincerely,


J. Harry Kerns, P.E.
District Air Engineer

DRZ/

cc: ✓ John B. Koogler, P.E., Koogler & Assoc.
Barry Andrews - CAPS, DER-Tallahassee w/copies of
applications and correspondence



KOUGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
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KA 307-86-04

October 22, 1990

Mr. David Zell
Florida Department of
Environmental Regulation
Southwest District Office
4520 Oak Fair Blvd.
Tampa, FL 33610-7347

Subject: Hernando County AP
Central Power & Lime, Inc.
Response to Department's Letter of
October 3, 1990

Dear Mr. Zell:

This letter is in reference to questions raised during our telephone conversation of September 26, 1990, and the subsequent letter of October 3, 1990, from Harry Kerns to Mr. Tom Mountain of Central Power & Lime, Inc. of Brooksville, Florida. Please refer to the attached copy of this letter for the questions leading to each of the following responses.

1. As you have stated, the construction permits for each of the six referenced sources associated with the lime plant do require that initial compliance with the particulate matter emission limiting standard be demonstrated using EPA Method 5. When the six permits were issued in 1985, this test requirement was overlooked and it was overlooked again when the initial compliance tests were conducted in 1989.

The reason the Method 5 test requirement was not noticed is that compliance for all of the small baghouses permitted for the CPL cement plant could be demonstrated using EPA Method 9. It was presumed, when the lime plant permits were issued in 1985, that the same test requirement (EPA Method 9) would be the method of demonstrating compliance for these sources. Had the EPA Method 5 test requirement been noticed, CPL would have immediately applied to the Department (in 1985) for an alternative sampling procedure.

Mr. David Zell
Florida Department
of Environmental Regulation

October 22, 1990
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One of the reasons that the Method 9 compliance test requirement was requested and granted for the small baghouses associated with the cement plant is that none of the small baghouses are equipped with a stack that would allow EPA Method 5 testing. This same design characteristic holds true with the six baghouses associated with the lime plant. It is common, I'm sure you realized, to not equip small baghouses with stacks as compliance demonstration requirements more often than not require only visible emission testing.

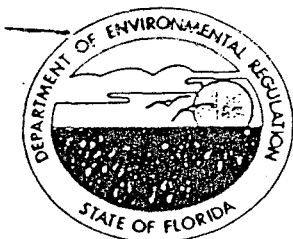
As there are no stacks associated with any of the six subject baghouses as would be required for Method 5 testing, CPL requests that the Department allow testing in accordance with EPA Method 9, with an opacity limit of five percent, as an alternative test procedure. In accordance with Rule 17-2.700(3)(d), FAC (See Attachment 2), the Secretary of the Department or a Deputy Assistant Secretary can grant approval for such an alternative sampling procedure.

We apologize for our oversight of the test requirement and would appreciate your consideration of this matter.

2. The information on the baghouses associated with each of the six referenced sources in the lime plant is included as Attachment 3.
3. The throughput rate specified in the air construction permit application for each of the six referenced sources in the lime plant was based on preliminary engineering design data and projected production rates. As a result of design changes made during the construction of the cement plant and as a result of operational modifications once the plant came on-line, material throughput rates in various parts of the plant have changed.

The six referenced sources are all associated with material handling activities; i.e., screens, storage silos, or storage bins. It is our engineering opinion that changes in throughput rates to such facilities do not affect emissions in any significant way as the emissions being controlled are generated by the movement or transfer of a solid bulk material; not from a production process where emissions are proportional to a production rate. As long as the ventilation rate for an activity is sufficient to collect all of the dust generated and the air-to-cloth ratio of the baghouse controlling emissions is sufficient to handle the ventilating air stream, material throughput rate will have no significant affect on emissions from the baghouse. The fact that no visible emissions were detected at current throughput rates when compliance tests have been conducted is further demonstration that the baghouses are performing adequately.





Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

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Dr. Richard Garrity, Deputy Assistant Secretary

October 3, 1990

Mr. Tom Mountain
Environmental Manager
Central Power & Lime, Inc.
P.O. Box 1508
Brooksville, FL 34605-1508

Dear Mr. Mountain:

Re: Hernando County - AP
AO27-186140 to 141 and 186143 thru 146

On September 7, 1990, the Department received your six Certificates of Completion of Construction (COCOC) for Air Pollution Sources forms for the CPL Lime Plant which also serve as applications for operation permits. In order to continue processing the applications, the Department will need additional information pursuant to Rule 17-4.070(1), F.A.C.

1. The construction permits for the CPL Lime Plant (AC27-091426 091427, 091429, 091430, 091432 and 091433) require, in Specific Condition No. 2, that an initial Method 5 particulate matter stack test be performed and a report submitted to the Southwest District Office. Specific Condition No. 7 goes on to specify that if the initial performance test showed compliance then subsequent compliance tests could be done as DER Method 9 VE tests. The COCOC's submitted contained only VE tests and no Method 5 particulate tests. Therefore, particulate matter stack tests must be submitted for each source.
2. No information as to the specific manufacturer, model number and specifications of the baghouse control devices has been included with previous application material. This information must be submitted.
3. In the VE test reports, on Table 1, the maximum tested throughput rate and the maximum permitted rate were shown. The maximum throughput rates are not specifically stated in the construction permits, but review of the construction applications shows different maximum throughputs than those shown in the test report. Please explain the differences for each test value versus application value and why each source construction permit/application has not been modified to reflect any changes. (See attached comparison table).