

September 4, 1991



Mr. C. H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RECEIVED  
ENVIRONMENTAL  
ENGINEERING  
CONSULTANTS, INC.

SEP 11 1991

Division of Air  
Resources Management

Re: Lafarge Corporation  
White Cement Unloading  
AC29-185895

Dear Mr. Fancy:

Lafarge, Inc. is currently in the process of applying for an operating permit with the Florida Department of Environmental Regulation's Tampa Office and the Environmental Protection Commission of Hillsborough County (EPCHC) for the white cement unloading operation.

During their review, EPCHC raised a concern that the permit does not allow for the shiphold to be open during unloading.

Specific Condition No. 2 reads:

"2. Particulate matter emissions from the No. 8 baghouse controlling silos Nos 11, 12, 17 and 18 shall not exceed 0.03 grains/DSCF, 3.1 lbs/hr, and 5% opacity. Visible emissions from the shiphold shall not exceed 5% opacity."

Although there is not a reference to the applicable regulation from which the standard for the shiphold was obtained, the Final Determination dated January 31, 1991 does reference the rule. In response to several recommendations from EPCHC, the language of the Final Determination states "...the allowable visible emissions from the shiphold be reduced to 5% opacity as required by the Department's regulations (FAC Rule 17-2.650(2)(c)11). The Department agrees with EPCHC's comment and has changed Specific Conditions Nos 2 and 3 of the proposed permit to include these changes."

Since the permit clearly addresses the visible emission limit on the hold of the ship, both Lafarge, Inc. and EEC assumed FDER and EPCHC recognized the need for the hold to be open in order to allow the screw conveyer system to operate.

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The initial compliance test on the shiphold was conducted on May 12, 1991. Based on our conversations with EPCHC, a three hour visible emission test would be required. During the second hour of the test, a very minute increase in opacity was observed hovering over the hold of the ship for a seven (7) minute period. During that time the average opacity was 15.2%. During the rest of the test period, the hold of the ship was in compliance. A representative from EPCHC was present during a portion of the test, he observed the open holds and found no problem with the operation.

On June 5, 1991 representatives from Lafarge, Inc. and EEC met with EPCHC to discuss this minor VE problem on the initial compliance test and proposed methods to correct the problem. This procedure was implemented, a retest was conducted on July 21, 1991 and confirmed the source to be in compliance with permit limitation. The county again observed the operation with the holds open and indicated no problem.

EPCHC feels the intent of the permit was to have the hold of the ship closed during unloading. It has been our intent all along to have the holds, where the screw conveyor operates, open during unloading.

The confusion may have arisen in EEC's October 18, 1990 response to FDER's letter of September 21, 1990. In the letter the "enclosed screw conveyor" system was discussed. We have attached photographs and drawings of the screw conveyor obtained from the supplier. As you can see, the screw conveyor is enclosed. This assists in reducing fugitive emissions. In addition, the letter goes on to say that the "shipboard personnel will be instructed to operate the conveying equipment so as to keep fugitive emissions at a minimum". It is our opinion that this infers the hold to be open or the issue of fugitive emissions would be moot if the hold was completely closed.

It has been EEC's experience that Subsection 17-2.650(2)(c)11., FAC has only been applied in permits when the hold of a ship is fully or partly open. Conventional pneumatic unloading of cement using a closed hold does not have this limitation.

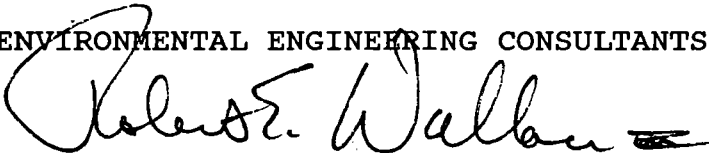
We would therefore request that the language of the construction permit be amended to clearly allow for the shipholds to be open during unloading activities associated with the screw conveyor system so this confusion does not arise again.

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Should you or your staff have any questions, please call Jim Estler at 238-3311.

Sincerely,

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

A handwritten signature in cursive script that reads "Robert E. Wallace III". The signature is written in dark ink and includes a horizontal flourish at the end.

Robert E. Wallace III, P.E.  
President

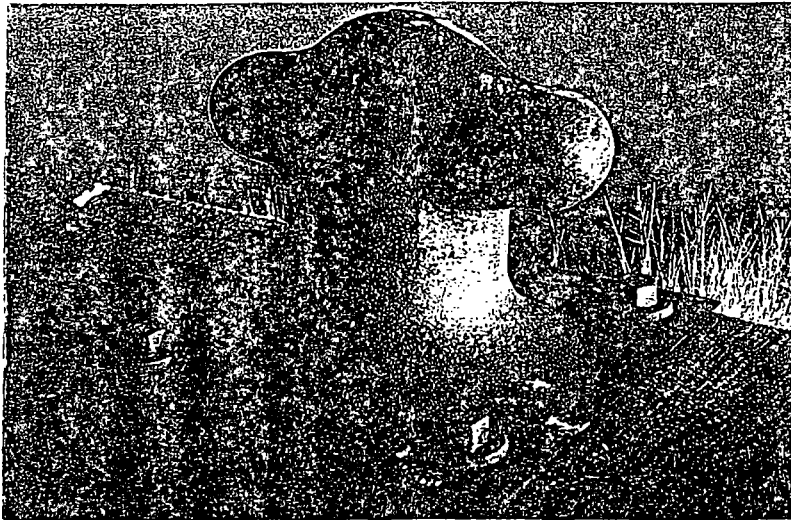
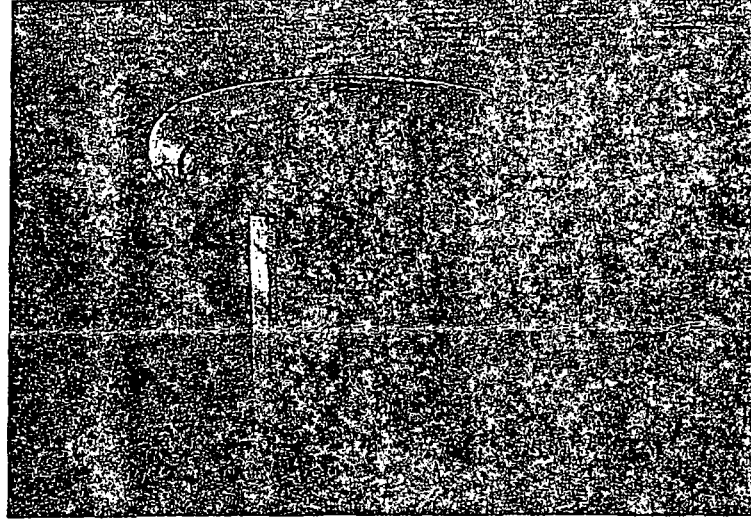
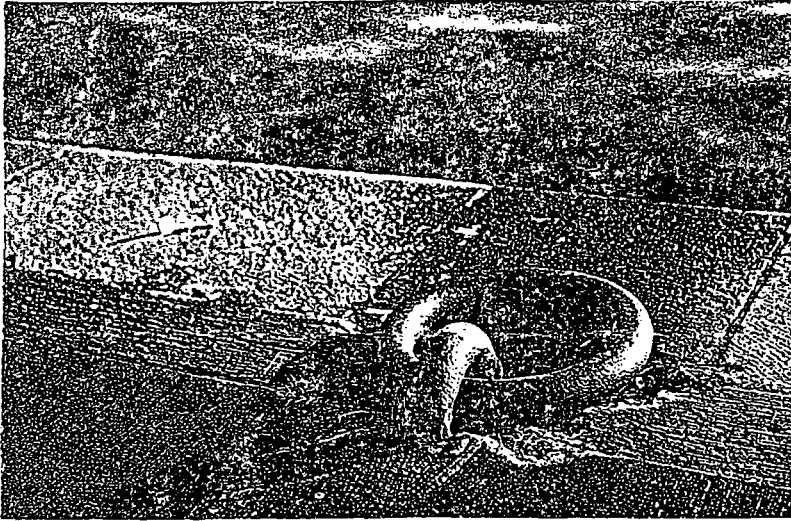
REW/JE/lrp/dege

Enclosure:

cc: Darrel J. Garaziani, EPCHC  
Guy Schuch, Lafarge, Inc., Tampa  
John W. Wittmayer, Lafarge, Dallas

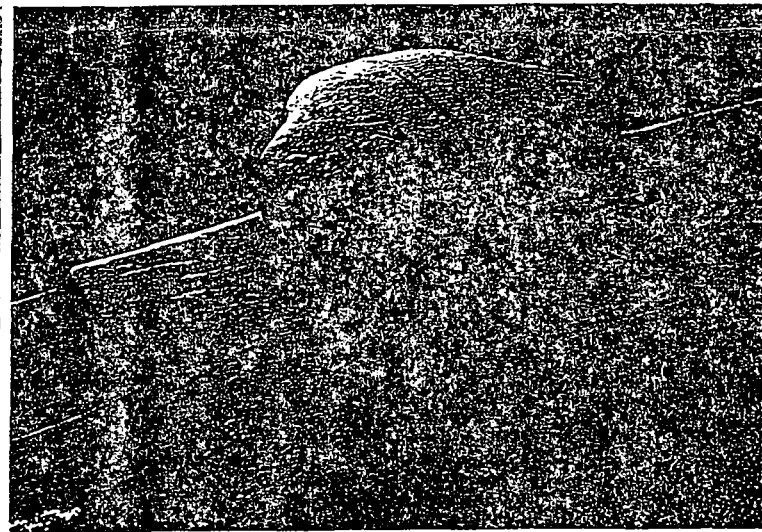
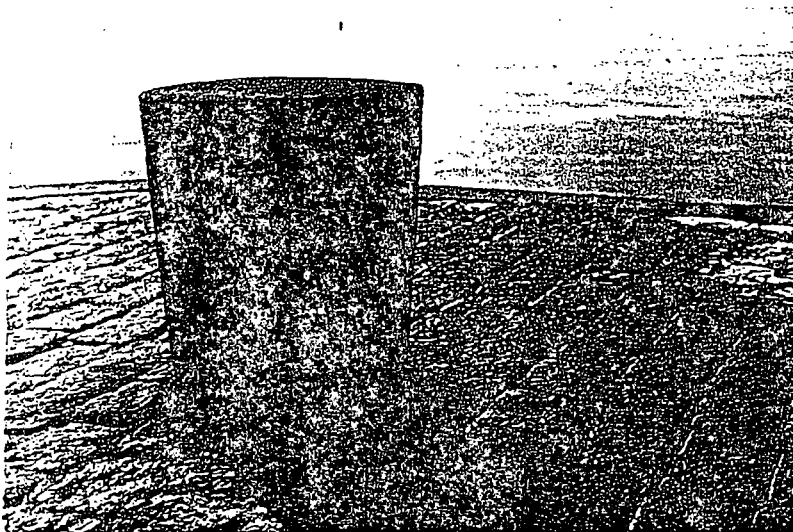
*H. Hanks*

*B. Thomas, SW Dist*

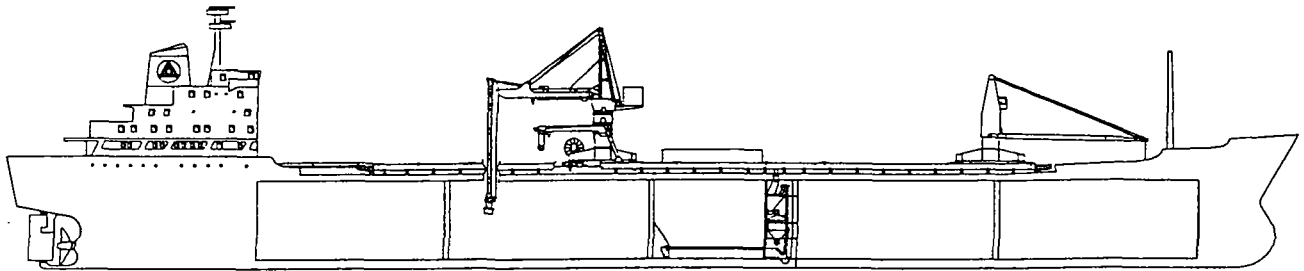


## Self-loading and self-unloading system for Bulk Carriers

– easy flowing commodities



# Multipurpose self-unloader



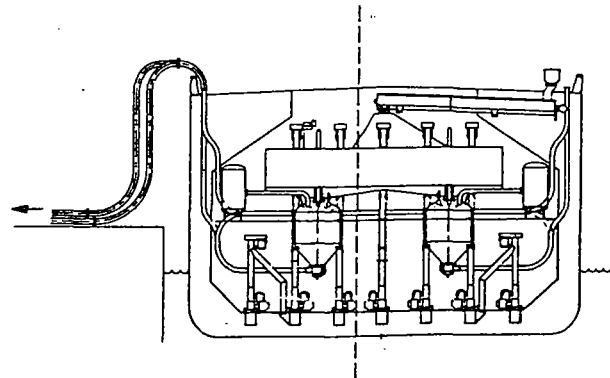
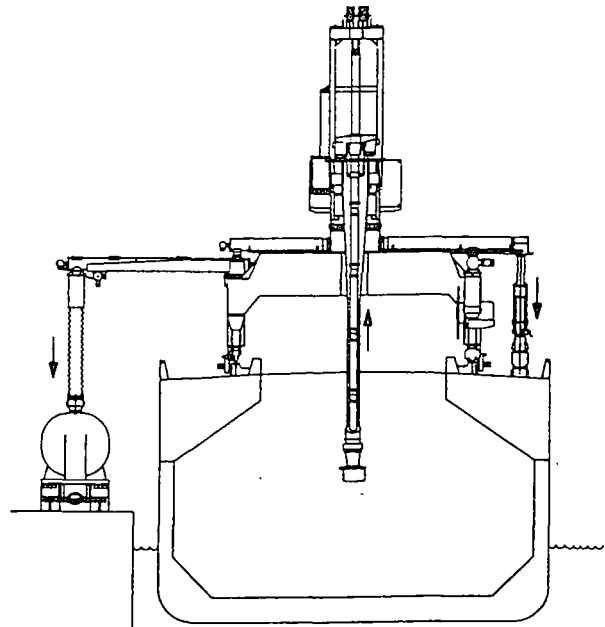
Self-unloaders fitted with a gantry type screw unloader offer increased flexibility regarding the type of commodities which can be transported.

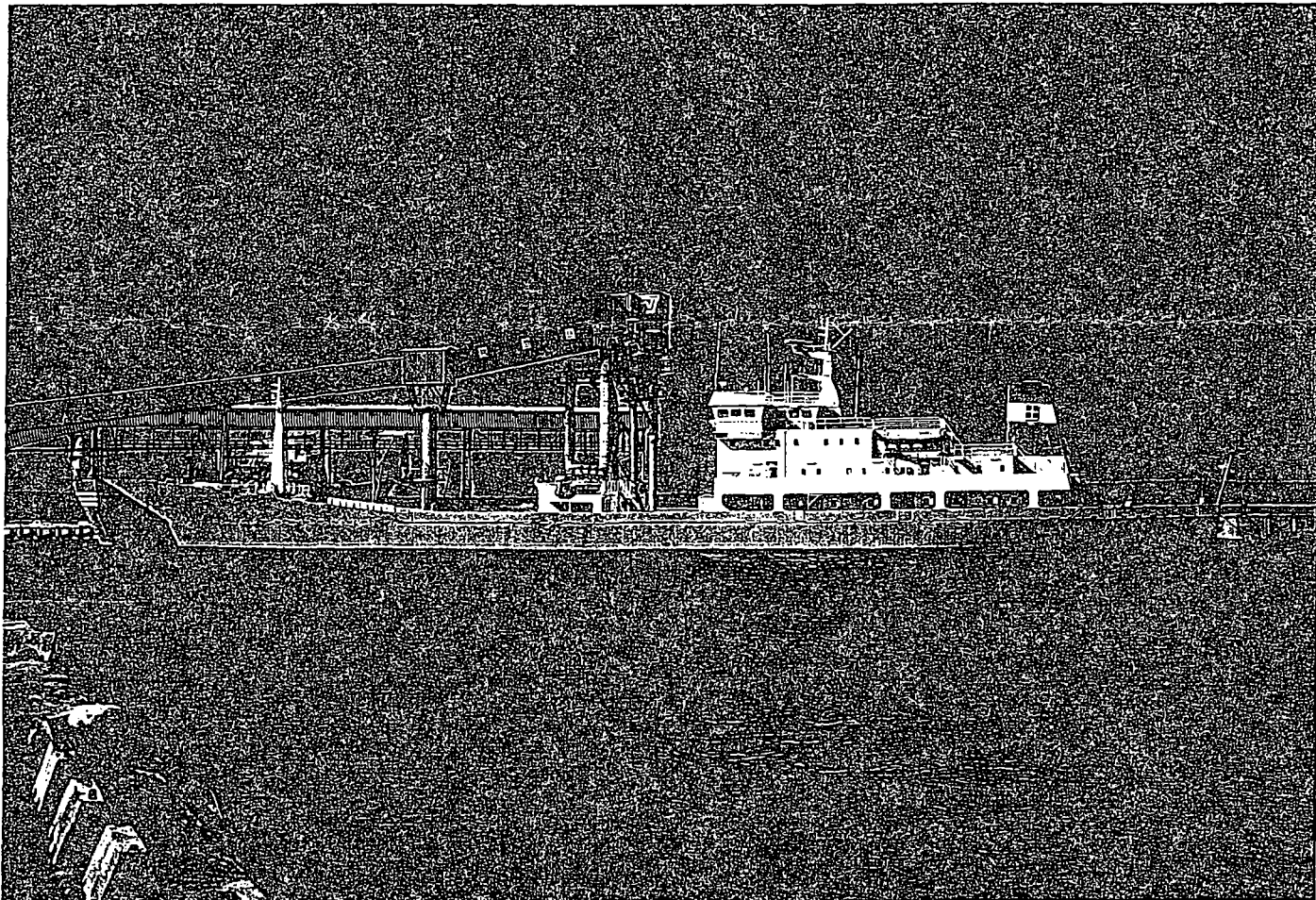
The gantry type unloader travels on deck and reclaims the material from the holds. The material can be discharged either direct into trucks or into the shore-side receiving conveyors by means of loading arms on both sides on the gantry.

Alternatively, the material can be discharged into a longitudinal conveyor on deck and from there to the pneumatic pumping station for discharge into the shore-side pipelines.

The above illustration shows a combination of the two self-unloading systems with the centre hold equipped for totally enclosed unloading. Hereby, the ship can discharge one hold independent of weather conditions. The fact that the vessel can carry a wide range of products makes the vessel very flexible with increased possibilities for return freights and thereby improved economy.

This system is particularly suitable for conversions of standard bulk carriers into self-unloaders as the modifications are kept to a minimum.





CMH MARINE AB is a company within the Consilium Group, which is organized in three business areas:

Materials Handling  
Marine & Industrial Products  
Trading

Within business area Materials Handling CMH Marine plays a dominant role with its two main product groups; Nordströms self-unloading equipment for bulk carriers and Siwertell continuous screw type ship unloaders.



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