COMMISSION
PHYLLIS BUSANSKY
JOE CHILLURA
PAM IORIO
SYLVIA KIMBELL
JAN KAMINIS PLATT

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ED TURANCHIK FAX (813) 272-5157



ROGER P. STEWART
EXECUTIVE DIRECTOR
ADMINISTRATIVE OFFICES
AND
WATER MANAGEMENT DIVISION
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960

AIR MANAGEMENT DIVISION TELEPHONE (813) 272-5530

WASTE MANAGEMENT DIVISION TELEPHONE (813) 272-5788

ECOSYSTEMS MANAGEMENT DIVISION TELEPHONE (813) 272-7104

September 12, 1991

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

Re: Hillsborough County - AP DER File No. AC29-185985 Lafarge Corporation

Dear Mr. Fancy:

In regard to Mr. Robert Wallace's September 4, 1991 request to amend the above construction permit I would like the Environmental Protection Commission of Hillsborough County to be on record as recommending that the request be denied based on our belief that the specific process permitted by the above air construction permit is not the process currently being employed to unload the white cement from the ship to the silo. The Environmental Protection Commission of Hillsborough County feels that the difference although small does trigger "modification" since particulate matter will be released from the shiphold as demonstrated during both These emissions were not originally accounted compliance tests. in the construction application (attachment III of the application) since the hatches were to be closed. The following descriptions should help clarify the Environmental Protection Commission of Hillsborough County's position.

Description #1, October 18, 1990 response:

The ship uses an enclosed screw conveyor to pick-up and transfer the cement from hold storage to a sealed tank on the ship where air is injected for the pneumatic transferring process. The cement is delivered from the ship directly into the silo by this pneumatic conveying system. No other transfers are made.

SEP 1 6 1991

Division of Air
Resources Management

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Mr. Clair Fancy, P.E. September 12, 1991 Page 2

Description #2, June 13, 1991 response:

A dedicated vessel, the Dania Portland is used to transport cement between it's loading port in Denmark, and various ports in the United States and Puerto Rico. Tampa is usually the last stop on it's voyage. The vessel is divided into 5 holds containing cement. The center or #3 hold, with a capacity of about 4,000 tons has at it's bottom a reclaim system that conveys the cement to a pneumatic pump discharging the cement to the receiving silos. Conveying from #3 hold is performed with the hatches closed, and all systems are enclosed.

Cement from the 4 other holds has to be transferred to #3 hold for pumping off the silos. This is done using a "Siwertell" ship unloading system. This consists of a ship mounted gantry screw unloader that picks up the cement from the open hatches with a screw head and transports it through an enclosed conveying system to the pumping hold. The system is remotely operated by the ship's operator.

There is a certain amount of dust created around the screw head when material is agitated which is confined to the holds. However, when banks of material form and collapse, greater amounts of dust may be created for short periods of time and may escape through the open hatches. Without a breeze, this dust may hover above the hold of the ship. We believe this was most likely the case during the second hour of the visible emission test.

The above descriptions reveal a small but significant difference in that an additional transfer (hold to hold) is now required. This additional transfer requires that the hatch(es) be open thus allowing fugitive emissions. We strongly believe that this difference reflects a change in the method of operation which resulted in an increase in actual emissions. This belief has been communicated to Lafarge and Environmental Engineering and Consultants.

Mr. Clair Fancy, P.E. September 12, 1991 Page 3

Thank you for considering our recommendations on this matter and should you have any questions please feel free to call me at (813) 272-5530.

Sincerely,

Darrel Graziani

Chief, Air Permitting Section

bm

cc: J. Harry Kerns, P.E., FDER SW-District

Robert Wallace, Environmental Engineering and Consultants

Guy Schuch, Lafarge Corporation

Enclosures: Attachment III - Permit Application

October 18, 1990 EEC Letter June 13, 1991 Lafarge Letter

July 21, 1991 Method 9

ATTACHMENT LIL

Process Weights and Emissions Estimates

The proposed ship offloading system for white cement will pump 20,000 tons per year into silos at the main plant. The pumping rate is dependent on the individual ship pumping capacity. The expected range is 200-500 tons per hour.

The estimated maximum emission rate (using the RACT emissions limit of 0.03 gr/dscf) is:

E = (12,000 cu.ft./min.)(0.03 gr/cu.ft.)(60 min/hr)/(7000 gr/lb) E = 3.09 lb/hr.

Actual tons per year (based on 100 hrs/yr operation @ 200 TPH) E = (3.09 lb/hr)(100 hrs/yr)/(2000 lb/ton)

E = 0.15 ton/year maximum

The unloading rate is expected to be greater than 200 TPH, with operating hours proportionally less, resulting in lower total tons per year.

The existing truck transfer operation, which will be discontinued except for special cases as explained in Attachment II, currently has a total emissions of 0.16 tons per year.

As a result of the proposed ship offloading system, less white cement will be handled through the existing systems at Terminal III. The process weights for both Permit No. A029-127516 for the ship offloading and Permit No. A029-132629 for

truck loading will be reduced by 20,000 tons per year from 52,500 T/yr to 32,500 T/yr. As a result, the total emission will be reduced by 0.2 T/yr. for Permit No. A029-127516 and by 0.06 T/yr for Permit No. A029-132629.

The net decrease in total plant emissions resulting from the proposed new system will be 0.27 tons per year.

October 18, 1990



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DER-BA

CONSULTANTI, INC.

QCT 20 1990

FPC OF H.C.

Mr. C. H. Fancy Department of Environmental Regulation 2600 Blair Stone Road Tallahassee, Florida 3239 -2400

Re: File No. A 129-165195, White Cemer's Chip to Sile 神神神通過極極 Conveyor System

Dear Mr. Far by:

On behalf or lafarge Corporation please accept the following response to your letter of September 21, 1990 requesting additional information on this projec:

- 1. The ship uses an enclosed screw conveyor to pick-up and transfor the dement from hold a chaque to a sealed tank on the ship we are air is indicated for the pheumatic transforming process. The dement is delivered from the ship directly into the local by this presumatic contaying system. To other transfers are made.
- 2. Rugitive et as a same minimized by use of a complete enclosure a and the screw conveying system. The shi board personnel will be instructed to operate the conveying equipment so as to keep fuguive emissions to a minimum.
- 3. Pursuant to Subsection 17-2. (2)(c) 11.b(i), FAC the maximum visible emulations from the ship hold due to the proposed pneumatic conveyor system will not exceed 5 percent opacity.

If you have any questions or need additional information, please contact me.

Sinc rely,

EMVIR DESINTAL ENGINGMENTS, IN .

Robert E. Willace III, P.E.

President

REW/dege

cc: G. Schuch, Lafarge

A. Tradelickows

B. Charian

9. Campbell

5119 NOTTH FLORIDA AVENUE 20. BOV 7854 TAM: A. FLORIDA 33673

813/23 -3781

 $813/23 \! \pm 0036$



June 13, 1991

Mr. Darrel Graziani, Chief Air Permitting Section Environmental Protection Commission Of Hillsborough County 1410 North 21st Street Tampa, FL 33605

Re: Hillsborough County - AP

Lafarge Corporation

A029-195230

Dear Mr. Graziani:

In follow up to our meeting on June 5, 1991, I am providing a brief summary of problems identified during the recent visible emission test on the ship hold while unloading white cement.

- 1. A copy of the visible emission test for the ship hold and white cement silo baghouse exhaust were presented to the county at our June 5, 1991 meeting. An additional copy is being provided with this letter. Please note all visible tests were conducted on May 12, 1991, and one visible emission report form has been updated accordingly.
- 2. The average hourly and maximum six minutes opacity were as follows:

<u>Hour</u>	Average/Hour	Max. 6 Minute Average
First	1.6%	4.4%
Second	2.3%	15.2%
Third	0.9%	3.1%

Mr. Darrel Graziani June 13, 1991 Page 2

- 3. As discussed a visible emission problem was noted during the second hour. The exact cause of the problem is unknown since the visible emission observer was not in a location where he could see the activity inside of the ship's hold. The observer did note, however, that it was a very still day and observed opacity hovered above the ship's hold without dissipating. Further, Lafarge personnel were busy elsewhere coordinating the off loading activities.
- 4. A dedicated vessel, the Dania Portland is used to transport cement between it's loading port in Denmark, and various ports in the Unites States and Puerto Rico. Tampa is usually the last stop on it's voyage. The vessel is divided into 5 holds containing cement. The center or #3 hold, with a capacity of about 4,000 tons has at it's bottom a reclaim system that conveys the cement to a pneumatic pump discharging the cement to the receiving silos. Conveying from #3 hold is performed with the hatches closed, and all systems are enclosed.

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5. Since Lafarge does not operate the vessel unloading system, it is difficult to control the activity on the ship's hold. We would however propose to alter our operating and maintenance plan to include a preunloading meeting with the Captain of the ship and unloading personnel detailing what measures should be taken to minimize emissions. Further, an observer from Lafarge will be present at the hold at any time it is open to oversee the unloading activities. He will have the responsibility to shut down the unloading operation should a potential dust problem occur.

Mr. Darrel Graziani June 13, 1991 Page 3

- 6. No ships have unloaded since the May 12, 1991 test.
- 7. Bob Soich from the EPC compliance section was present during a portion of the test. It is our understanding that he did not observe any problem with visible emissions during his visit and can attest to how calm a day it was.
- 8. Lafarge will retest the hold when another ship unloads using the above procedures.
- 9. Attached you will find a copy of FDER, Tallahassee May 28, 1991 letter extending the construction permit to September 30, 1991 and providing for a one hour test at this source.
- 10. You expressed a concern about the 90 day clock on the permit. Since we are still in the 30 day incompleteness cycle, a letter from EPC within 30 days of receipt of the visible emission test, requesting another test showing compliance would preclude the 90 day clock from starting.

We hope that the County will take into consideration that this is a new operation under a construction permit. As with any new source, some minor problems are bound to occur, and the so called bugs must be worked out of the system. This is part of the shake down on any new operation. Further as soon as the problem was discovered, Lafarge investigated the problem and came forward to discuss the matter with EPC.

Your cooperation in this regard is appreciated. If you have any questions, please give me a call at 238-3311.

Sincerely,

LAFARGE CORPORATION

John S. Wittmayer

Min L Withmay

Environmental Manager

JWE/dege

cc: FDER, Tampa



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400 Lawton Chiles, Governor Carol M. Browner, Secretary

May 28, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Guy Schuch, Terminal Manager Lafarge Corporation 2001 Maritime Blvd. Tampa, Florida 33605

Dear Mr. Schuch:

Re: Amendment of Permit No. AC 29-185895

The Department is in receipt of Mr. Carl Fink's April 9 letter requesting that the expiration date of your permit to construct a ship to silo pneumatic transfer system for white cement be extended and that the Department allow the visible emission compliance test for the shiphold to be of one hour duration. These requests are acceptable to the Department. The expiration date of permit No. AC 29-185895 is extended from July 1, 1991, to September 10, 1991. The visible emissions tests on the shiphold, which is regulated under F.A.C. Rule 17-2.650(2)(c)11., shall be for 60 minutes duration (ten 6 minute averages).

A copy of this letter must be filed with the referenced construction permit and shall become a part of that permit.

Sincefely,

SZEVE SMALLWOOD, P.E.

Director

Division of Air Resources

Management

SS/WH/plm

c: Bill Thomas, SW Dist. Jerry Campbell, EPCHC

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VISIBLE EMISSION OBSERVATION FORM

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5119 N. FLORIDA AVENUE . P.O. BOX 785.1 - TAUDA EL OCICA 20000 (819) 207 270-

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC. VISIBLE EMISSION OBSERVATION FORM

VISICLE EMISSION CESCAVATION FORM						
LAFARGE CORPORATION		B9162	DATE 5-16-9			
LOCATION 200 MAZITIMERUPPERMIT HUNDER		OBJERVER'S NAME (PAINT) BYRON BUTTOUS				
TAMPA FL	A 029-185895	CENTIFIED AY FOLTR	15x3. 8-3c-91			
WHITE CEMENT SHIP VAL	TENNINGS JORTHOS	13 TART TIME / 45 - 40 ST	15 20 45 60			
OESCRIBE EMISSION POINT SHIPHOLD OPEN	v)	11510101011	101010101			
EMISSION POINT HEIGHT 180VE GROUND BEYEL N 30 + 1	HAVESERD OF STELLISE RELATED OF STELLISE	1000000	10101010			
DISTANCE TO EMISSION POINT A \$50 FT	DI MOITDENINE THIPS MOITSEINE A A	11/5 70 20 20 30	10000			
DESCRIBE EMISSIONS		1 120 120 120 120 13	101010			
WHITE CEMOUT	OUS7	1012010120130130				
COLOR OF SHIESTONE	CTHISTINE THE STAN	11/01/01/01/01/01	10101010			
WATER VAPON PRESENT	CONDACTED CONDACTE	1010101017014	0101010			
AT WHAT POINT WAS OPACITY DETEN	! 	11:1/015101014				
ARCA OF SHIPHO	CP .	10 10 10 10 10 14				
TRUES / BUILDING	(5	18 10 10 10 10 149	15 /01010			
COLOR OF TACKOROUMO	SKY COMOLTIONA	122 0 0 0 0 0 1 20				
GREEN/ BLUE/GRUY		110000011	1001010			
O-2 MPH	WIND DIRECTION	12101010012				
ANCIAR THAILME	75%	1010101011				
RENARKS COO TI ANI		1:5 10 10 10 10 1:15	10000			
SHIP: DANIA PORTLANI	· .	1: 1 0 1 0 1 0 1 0 1 1 1 1 1 1 1 1 1 1 1	0 0 0 0 0			
PRODUCT: WHITE CE "		31010101019				
Cenent transfer rate averaged but		2010101010140				
(80 T/m during 3	how tes	AVERAGE OPACITY : 2,3 % RANGE OF SPACITY HEADINGS				
		ALL O'ACIET : 15.2 % FROM				
F HOSEN SHIPHOLOS STEPHOLOS STEPHOLOS						
TOP VIE	i.a.~					
GOTTON S	7 u []	INVIETA.	va.			
121-14 IV 1	XFII (II)	STATE OF ENVIRON DEPARTMENT OF ENVIRON				
	P01.	NT ATTE	· }			
	7	THIS IS TO CER BYRON BURROWS	TIFA THAT			
O _X .		STATE OF FLORION visible emissions evaluations of specified lights of the control	by EPA reference method 9.			
	/	AL	ig 28, 1991			
OBSERVER	/	Michael P Clark CENTIFICATE OFFICER	BYNOW BEARER'S SIGNATURE			

	VISIBLE EMISSION	MOITAVRABBO			
JOUNCE NAME		8/162 3/6 1/			
LAFARGE CORP LOCATION 2001 MARITIME BLVD PERMIT NUMBER AC 29 10595		OBJERVER'S NAME (PRINT) BY FOOD BUTTONS			
TAMPA FL	AC29-185895	CERTIFIED BY FOUR DATE 8-30-91"			
MHITE SHIP UNL.	CONTROL EQUIPMENT	15 30 48 60 15 10 45 60			
DESCRIBE ENISSION POINT		11010 01011 5 15 15 15			
SHIPHOLD ENISH MINE HEIGHT	EMISSION POINT HEIGHT	110 010 010 13 15 15 1/0 13			
THE CE THIS HOLD SAGE	RELATIVE TO OBJERVER	1000001315101010			
DISTANCE TO EMISSION POINT ~ 50 ft	M M LINELLINE TO THE STATE OF T	10 0 10 10 134 15 15 15 15 15 15 15 15 15 15 15 15 15			
BHOIZSING BHIRDEGO	i.	101010101310101010			
White Cement		0101010101010100			
COLOR OF EMISSIONS Chite.	CONTINUOUS FUGITIVE	11/01/5/3/3/01/01/01/01/01/01/01/01/01/01/01/01/01/			
MATER VAPOR PRESENT	IF YES, 13 PLUME	01/015 15 15 10 10 10 10			
HO YES	DEHOATED DEHOATTA	1015 15 10 10 10 10 10 10			
AT WHAT POINT WAS OPACITY DETE	ЛМІН€О	18:010101010101010			
LINEA OF SH	TPHOLO	1101015151410101016			
OFSCHIRE BACKOHOUNO		101010100			
TROKS/BUILDINGS		101010101010151/0155			
GROWN BLUE/CARY	RHOITIGHCS YXE	11101010101011151515			
WIND SPEED 3-5 MPH	WIND SIRECTION	11 01 01 010 1215 15 15			
AMBIENT TEMPERATURE	RELATIVE HUMIDITY	10 0 0 0 0 0 0 0			
837	<u> </u>	100000000000000000000000000000000000000			
REMARKS L. Louiston Tal	, averaged	10101010 11101010			
Cenent transfer rate averaged		29 10 10 10 10 15 15 15			
Cenent transfer lack as how test		151010151010101515			
		THE BLAT CHACITY : 1 6 % RANGE OF GPACITY READINGS			
		PAG. 6 MIN. : 4.4%			
		OBJENVERS SIGNATURE OATE			
		OBJERVER'S SIGNAL STOPPY			
SOURCE LAYOUT	котаха				
		and the second s			
		CTATE OF EL ARIDA			
(-	STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION				
SHITTION STATE OF THE STATE OF					
		OINT THE TOTAL THAT			
THIS IS TO CERTIFY THAT					
BYRON BURROWS has con					
	The state of the s	observer of visible emissions as specified by EPA reference method 9.			
THIS CERTIFICATE EXPIRES Aug 28, 1991					
Michael P Clark Byron Jo Gurous CERTHICATE OFFICER BEARER'S SIGNATURE					
70 SILO					
	DA FINE	DATHE MOST			
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JUI 26 1991

July 23, 1991

Mr. Bill Schroeder AJR PROGRAM
Environmental Protection Commission
Of Hillsborough County
1410 North 21st Street
Tampa, FL 33605

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

Re: Permit No. AC29-185895/A029-195230

Lafarge Corporation - White Cement Transfer

Dear Mr. Schroeder:

Enclosed is a copy of the visible emissions re-test of the open shiphold during the white cement transfer operation at Lafarge Corporation in Tampa, Florida. The test was one hour in duration per the May 28, 1991 amendment letter from the Florida Department of Environmental Regulation, Tallahassee.

The maximum six minute average opacity was 1.0 percent. The allowable opacity is 5 percent. The average cement transfer rate was 161 tons per hour. As explained in previous correspondence, this reported transfer rate is an average rate and should not be used as a maximum permissible transfer rate. The instantaneous pumping rate at some points in the pumping cycle will be much higher than the average rate.

If you have any questions, please contact me at (813) 238-3311.

Sincerely,

ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.

Carl F. Fink

Senior Environmental Engineer

CFF/dege/lrp

Enclosure:

cc: D. Graziani, HCEFC

J. H. Kerns, DER, Tampa

G. Schuch, Lafarge Corp.

J. Wittmayer, Lafarge Corp.

SOURCE NAME LAFACOE	CORPORATION	PROJECT N	UNBER PO	162		ATE -7	-21-91	
LOCATION	PERMIT NUMBER					L F. FINK		
TAMPA, FL	AC29-185895	CERTIFIED	вү	Fbee	<u> </u>	EAP. DATE	8-28-41	
PROCESS WHITE SHIP OFFLOAD	CONTROL EQUIPMENT	START TIME	1013	50	STOP	TIME 1131	3	
DESCRIBE EMISSION POINT OPEN SHIP HOLD		10	0 0	0	31	0 0	00	
EMISSION POINT HEIGHT	EMISSION POINT HEIGHT RELATIVE TO OBSERVER	1 0	8 8	Ō	33	\ddot{o} \ddot{o}	88	
AMZUP 40 FT.	OIRECTION TO EMISSION POINT	, 0	OC) Ö	35	0 0	0 0	
75-100 F7.	NW	5 <u>0</u>	0 0	0	37	0 0	$C \circ$	
DESCRIBE EMISSIONS CONOUT DU	· · ·	³ O	0 0	0	39	8 8	0 0	
COLOR OF EMISSIONS	CONTINUOUS FUGITIVE	11 Q	8 8	8	41	0 0	000	
WATER VAPOR PRESENT	IF YES, 12 PLUME ATTACHED DETACHED	13 0	00	0	43	0 0	0 0	
AT WHAT POINT WAS OPACITY DETEN	·	15 0	0 0	0	45	0 0	0 0	
EDGE OF SHIPHOL		17 0	0/0	0	47	0 5	50	
OFFOSITE SHORE OF	CHANGE (VECT PATION) SKY CONDITIONS	19 0	0 0	8	49	00	00	
CC1-5-YU	10 % (10)110	21 0	00	Ö	51	0 0	00	
	WIND DIRECTION	22 0	00	8	53	0 0 5	0 0 10 0	
AMBIENT TEMPERATURE	RELATIVE HUMIDITY ~ 75 %	24 O 25 O	0 0	8	 	0 0	0 0	
1030:30 for B minutes and at 1055:00		26 0	0 0	0	57 (
for 17 minutes.		30 0	0 0	ŏ o	50 C	0 0 0	0 0	
Unloading rate: 161 Touch		MAY 6 MW	, ,	.1% 0%			TREADINGS	
Sho: Dania Portland		OBSERVER'S	3IGNATURE /		FROM	OATE	7-21-91	
SOURCE LAYOUT S	ХЕТСЯ				7. 0-0			
N						•		
N	Pumping, this hold EMIS		: RTMENT C	STATE C	J. 19 J. 19 J. 1	IDA VTAL REG	ULATION	
THIS IS TO CERTIFY THAT								
	CARL F. FINK STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.							
D	Michael R Chick Carl J. H.							
	(on catualk)		A. T. I. A. I.		·	BEARER'S SIC	INATURE:	
out observer shaded)								