

Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

December 19, 1990

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

Dear Mr. Schuch:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit to construct a ship to silo pneumatic transfer system for white cement at your manufacturing plant located at 2001 Maritime Blvd., Tampa, Hillsborough County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Barry Andrews of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/WH/plm

Attachments

c: Bill Thomas, SW District Jerry Campbell, EPCHC Robert Wallace III, P.E.

BEFORE THE STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of Application for Permit by:

Lafarge Corporation 2001 Maritime Blvd. Tampa, Florida 33605 DER File No. AC 29-185895

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue an air construction permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Lafarge Corporation, applied on August 23, 1990, to the Department of Environmental Regulation for a permit to construct a ship to silo pneumatic transfer system for white cement at their manufacturing plant located at 2001 Maritime Blvd., Tampa, Hillsborough County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

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 Statutes. The petition contain Florida must 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 permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. 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, Florida Statutes.

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 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 notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) 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 publication of this notice in the Office in 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, F.A.C.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

C. H. Fancy P.E.

Chief

Bureau of Air Regulation

Copies furnished to:

Bill Thomas, SW District Jerry Campbell, EPCHC Robert Wallace III, P.E.

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 12^{-1}

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

State of Florida Department of Environmental Regulation Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Lafarge Corporation, 2001 Maritime Blvd., Tampa, Hillsborough County, Florida 33605, to construct a ship to silo pneumatic transfer system for white cement at their manufacturing plant located on Hooker Point in Hillsborough Florida. The dust collector County, (0.15 will emit 3.1 lbs/hr controlling this system particulate matter. Neither a Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) determination was required. The emissions from this source will not interfere with reasonable further progress toward attainment of the ambient air quality standards. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by Department's proposed permitting decision may petition for administrative proceeding (hearing) in accordance with Section Statutes. petition The must contain Florida 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, within fourteen (14) days of publication of this notice. 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, Florida Statutes.

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 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 Accordingly, designed to formulate agency action. Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements filed (received) within 14 specified above and be days publication of this notice 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, F.A.C.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation Bureau of Air Regulation 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Department of Environmental Regulation Southwest District 4520 Oak Fair Boulevard Tampa, Florida 33610-7347

Hillsborough County Environmental Protection Commission 1410 North 21st Street Tampa, Florida 33605

Any person may send written comments on the proposed action to Mr. Barry Andrews at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation and Preliminary Determination

Lafarge Corporation Hillsborough, County Tampa, Florida

White Cement Ship to Silo Pneumatic Transfer System File No. AC 29-185895

Department of Environmental Regulation Division of Air Resources Management Bureau of Air Regulation

I. General Information

A. Applicant

Lafarge Corporation 2001 Maritime Blvd. Tampa, Florida 33605

B. Project and Location

Lafarge Corporation applied for a permit to construct a Ship to Silo Pneumatic Transfer System for white cement at their manufacturing plant (SIC 3241) located on Hooker Point in Tampa, Hillsborough County, Florida, on August 24, 1990. The application was considered complete on October 24, 1990.

C. Process

White cement is brought to the plant in ships. Presently, cement is removed from the ship at Terminal (AO 29-127516) and transferred to the white cement truck and railcar loading facility (AO 29-132629). The cement can then be transferred from the truck/railcar facility to Nos. 11, 12, 17 or 18 silos (AO 29-127512). The proposed system will transfer up to 20,000 TPY white cement at a rate of up to 500 TPH directly from The 12,000 ACFM of air used by the the ship to the silos. proposed system to transfer the cement will pass through a Fuller Model 144D 510 (or equal) baghouse before being discharged to the The quantity of white cement handled by the ship and atmosphere. truck unloader systems (52,500 TPY) will be reduced by the amount transferred by the proposed system.

D. Emissions

The particulate matter emissions from the proposed pneumatic conveyor system are less than the existing ship and truck loading systems. The maximum particulate matter emissions from the baghouse serving the proposed system will be 0.03 grains/DSCF, and, based on 12,000 ACFM and 100 hrs/yr operation of the system, 3.1 lbs/hr (0.15 TPY). If the proposed system handles 20,000 TPY of white cement, the particulate matter emissions from the ship and truck loading systems could be reduced by 0.27 TPY. However, if the proposed system was not used for any reason, the allowable emissions from the ship and truck loading system would be the same.

II. Rule Applicability

The proposed project, construction of a white cement ship to silo pneumatic transport system, is subject to preconstruction review pursuant to Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapter 17-2.

The source will be located at a major facility, a Portland Cement plant which is on Table 500-1, Major Facility Categories, of Chapter 17-2, F.A.C. Emissions of particulate matter sulfur dioxide, and nitrogen oxides exceed 100 TPY.

The proposed source will be located in an area designated nonattainment for ozone and total suspended particulate (F.A.C. Rule 17-2.410), unclassifiable for PM_{10} and sulfur dioxide (F.A.C. Rule 17-2.430), and attainment for the other criteria pollutants (F.A.C Rule 17-2.420).

The maximum particulate matter emissions from the proposed source are less than the significant emission rates listed in F.A.C. Rule 17-2, Table 500-2. Therefore, the project is not subject to F.A.C Rule 17-2.510, New Source Review for Nonattainment Areas. It is subject to F.A.C. Rule 17-2.650(2), Reasonably Available Control Technology.

The source is subject to Standards of Performance for Portland Cement Plants (40 CFR 60, Subpart F).

III. Technical Evaluation

An enclosed screw conveyor will be used to transfer the white cement from the ship hold to a sealed tank. Approximately 12,000 ACFM of air is injected in this tank to pneumatic transfer the material to silos Nos. 11, 12, 17, and 18. The applicant estimates that the visible emissions from the ship during this operation will be less than 5% opacity.

Baghouse No. 8 (Fuller Model 144 DS10 or equal) filters the dust from the air used for the pneumatic transfer of the material prior to discharging the air to the atmosphere. The cement remains in the silos. The allowable particulate matter emissions for the baghouse is 0.03 grains/DSCF and 5% opacity. This is equivalent to 3.1 lbs/hr and, based on 100 hours/year operation, 0.15 TPY.

The Department believes that the proposed enclosed screw conveyor and baghouse can meet these emission standards.

IV. Air Quality

It is the judgement of the Department that the allowable emissions from the proposed project will not interfere with reasonable further progress toward attainment of the ambient air quality standards.

V. Conclusion

Based on the information provided by Lafarge Corporation, the Department has reasonable assurance that the proposed construction and operation of the white cement ship to silo pneumatic transfer system, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.

Teans 350 for 1



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE: Lafarge Corporation 2001 Maritime Blvd. Tampa, Florida 33605

described as follows:

Permit Number: AC 29-185895 Expiration Date: July 1, 1991

County: Hillsborough

Latitude/Longitude: 27°56'08"N

82°26'36"W

Project: White Cement Ship to Silo Pneumatic Transfer System

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawings, plans, and other documents attached hereto or on file

with the Department and made a part hereof and specifically

For the construction of a ship to silo transfer system consisting of an enclosed screw conveyor, seal tank, Fuller Model 144 DS10 (or equal) dust collector, and a 500 TPH white cement pneumatic conveyor system.

The system will be located at Lafarge Corporation's existing Portland cement plant at 2001 Maritime Blvd., Tampa, Hillsborough County, Florida 33605. The UTM coordinates of this site are Zone 17, 358.0 km E and 3090.7 km N.

The system shall be constructed and operated in accordance with the application submitted by Mr. Guy Schuch, Terminal Manager, to the Department on August 24, 1990, except as noted in the Technical Evaluation and Preliminary Determination or this permit.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

- 1. Application received August 24, 1990.
- 2. DER letter dated September 21, 1990
- 3. Environmental Engineering Consultants' letter dated October 18, 1990.

Permit Number: AC 29-185895 Expiration Date: July 1, 1991

GENERAL CONDITIONS:

- 1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

Permit Number: AC 29-185895 Expiration Date: July 1, 1991

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. a description of and cause of non-compliance; and
 - b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

Permit Number: AC 29-185895 Expiration Date: July 1, 1991

GENERAL CONDITIONS:

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

- 9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes compliance with New Source Performance Standards (NSPS).
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and

Permit Number: AC 29-185895 Expiration Date: July 1, 1991

GENERAL CONDITIONS:

records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

- 1. The ship to silo pneumatic transfer system for white cement shall not operate more than 100 hours per year. The permittee shall keep a time log on this system that can be used to determine compliance with this condition.
- 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.
- 3. Visible emissions from the ship hold shall not exceed 10% opacity.
- 4. Compliance with Specific Conditions Nos. 2 and 3 shall be determined by EPA Methods 5 and 9 (40 CFR 60, Appendix A, July 1, 1988) while the system is operating at its maximum capacity. After the initial compliance tests, the Method 5 test on the silo collector (baghouse No. 8) may be waived if visible emissions are less than 5% opacity.

Permit Number: AC 29-185895 Expiration Date: July 1, 1991

SPECIFIC CONDITIONS:

- 5. The permittee shall take reasonable precautions to minimize fugitive emissions from this operation. These precautions shall include proper maintenance of the system, prompt clean up of spills, and wetting the area when needed to control fugitive emissions.
- 6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).
- 7. An application for an operation permit must be submitted to the Environmental Protection Commission of Hillsborough County office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued	this	 day
of		 1990

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

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

3 and 4. Put your address in the "RETURN TO" from being returned to you. The return r	Space on the reverse eceipt fee will provide the following services (s) requested.	services are desired, and complete items side. Failure to do this will prevent this card you the name of the person delivered to and sare available. Consult postmaster for fees dress. 2. Restricted Delivery (Extra charge)
3. Article Addressed to: m. Ywy schuch Jalanal Corp.; 2001 Maritime Jampa, J. 3	Term. Mag Blud: 3605	Article Number 4 Article Number 9 407 953 933 Type of Service: Registered Insured COD Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature – Addressee X 6. Signature – Agent X 7. Date of Derven	9	8. Addressee's Address (ONLY if requested and fee paid)
PS Form 3811, Apr. 1989	★U.S.G.P.O. 1989-238-81	DOMESTIC RETURN RECEIPT

P 407 852 933

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED

NOT FOR INTERNATIONAL MAIL

	(See Reverse)		
34-555	Dur Schuc	N	
# U.S.G.P.O. 1989-234-555	Street and No.	D.	
0.8.0	Signe and ZIP Gode Life	no Bloo	
\$.U.\$	PARTINO, 91	\$	
4=	Certified Fee	 ,	
, [Special Delivery Fee		
	Restricted Delivery Fee		
_	Return Receipt showing to whom and Date Delivered		
S Form 3800, June 1985	Return Receipt showing to whom, Date, and Address of Delivery		
June	TOTAL Postage and Fees	S	
1800,	Frostmark or Date AC 29 -	185895	
e E	12-21-90		
S Fc	n.		