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DER-BAQM

November 26, 1990

Mr. Willard Hanks
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: File No. AC29-185895, LaFarge Silos

Dear Mr. Hanks:

Please be advised that I have reviewed the above application and offer the following comments for consideration in drafting the permit:

1. The facility NEDS No. is 0018 and the point ID No. is 05.
2. The permit should be issued pursuant to Rule 17-2.520, Source Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.
3. The project is subject to the requirements of 40 CFR 60, Subpart 000 - Standards of Performance for Nonmetallic Mineral Processing Plants. See Note #1.
4. The project is subject to the requirements of Rule 17-2.650, Reasonably Available Control Technology, since it is located within the Hillsborough County Maintenance area for particulate matter.
5. Particulate matter emissions generated during silo operation (loading and unloading) shall not exceed .05 g/dscm (NSPS Reg.) (Note: RACT - .03 gr/dscf).
6. During silo loading and unloading, the permittee shall not allow or cause any visible emissions (5 percent opacity) [Rule 17-2.650(2)(c)11.b.(i)].

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7. Hours of operation should be set at the requested level of 24 hrs./day, 7 days/wk. and 52 wks./yr.

8. The following source data is required to be in the operating permit [Rule 17-2.650(2)(d), F.A.C.] and shall be determined during the initial compliance testing:

A) Maximum Material Handling Rate (loading and unloading simultaneously).

B) Maximum dry standard volumetric flow rate through the control equipment.

C) The make, model no. and serial no. of the control equipment.

D) The actual exit diameter, UTM coordinates, and the height of the exhaust stack.

E) The exit temperature, actual volumetric flow rate, and moisture content of the silo exhaust gases.

F) Ship unloading operating parameters (unloading pressure).

9. Notification and recordkeeping requirements of 40 CFR 60.7 and 60.676 must be met and should be included as permit conditions.

10. Performance tests specified in the permit must meet the requirements of 40 CFR 60.8, 60.11 and 60.675.

Note #1 - The Environmental Protection Commission of Hillsborough County bases its determination of the applicability of 40 CFR 60, Subpart 000 on the following facts:

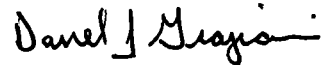
A) The permittee expects actual emissions from the modified silos to be at .16 tons per year. During calendar years 1988 and 1989 actual emissions were reported at 0.13 tons and 0.14 tons, respectively. Based on Rule 17-2.100(3), actual emissions will increase.

B) The permittee's expected decrease in emissions at their Penny Street facility is unenforceable since the current permits do not restrict either hours of operation or cement throughput.

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I hope the above comments will help in drafting the permit. The NSPS question may need to be addressed further and should you need any information please feel free to contact me at (813) 272-5530.

Sincerely,



Darrel J. Graziani
Chief, Air Permitting Section

bb

cc: J. Harry Kerns, FDER-Tampa
Guy Schuch, LaFarge Corporation