

# COUNTY OF HILLSBOROUGH



DER

JAN 7 1985

BAQM Date January 3, 1985

## MEMORANDUM

To Bill Thomas

From Jerry Campbell<sup>SC</sup> and Steve Gyrog<sup>SG</sup>

Subject: Construction Permit AC29-94093

Having reviewed the drafted permit of December 7, 1984, we offer the following comments:

1. The current operating permit for kiln #6 (A029-51704) limits the clinker production to 81.4 tons per hour. Disregarding downtime for maintenance, the facility is theoretically capable of producing 713,000 tons of clinker per year. Since clinker is an intermediate product, it must be processed further through the finishing mills and the load-out system. Our concern is that the draft construction permit does not address the additional emissions that could be created by processing 720,000 tons per year of imported clinker. The finishing mills and the loadout system are capable of handling the imported clinker, and nothing in their current operating permits prevent them from doing so (see attachment). This item came up when General Portland requested the County Commissioners' approval for industrial bond money to build the clinker importation system.

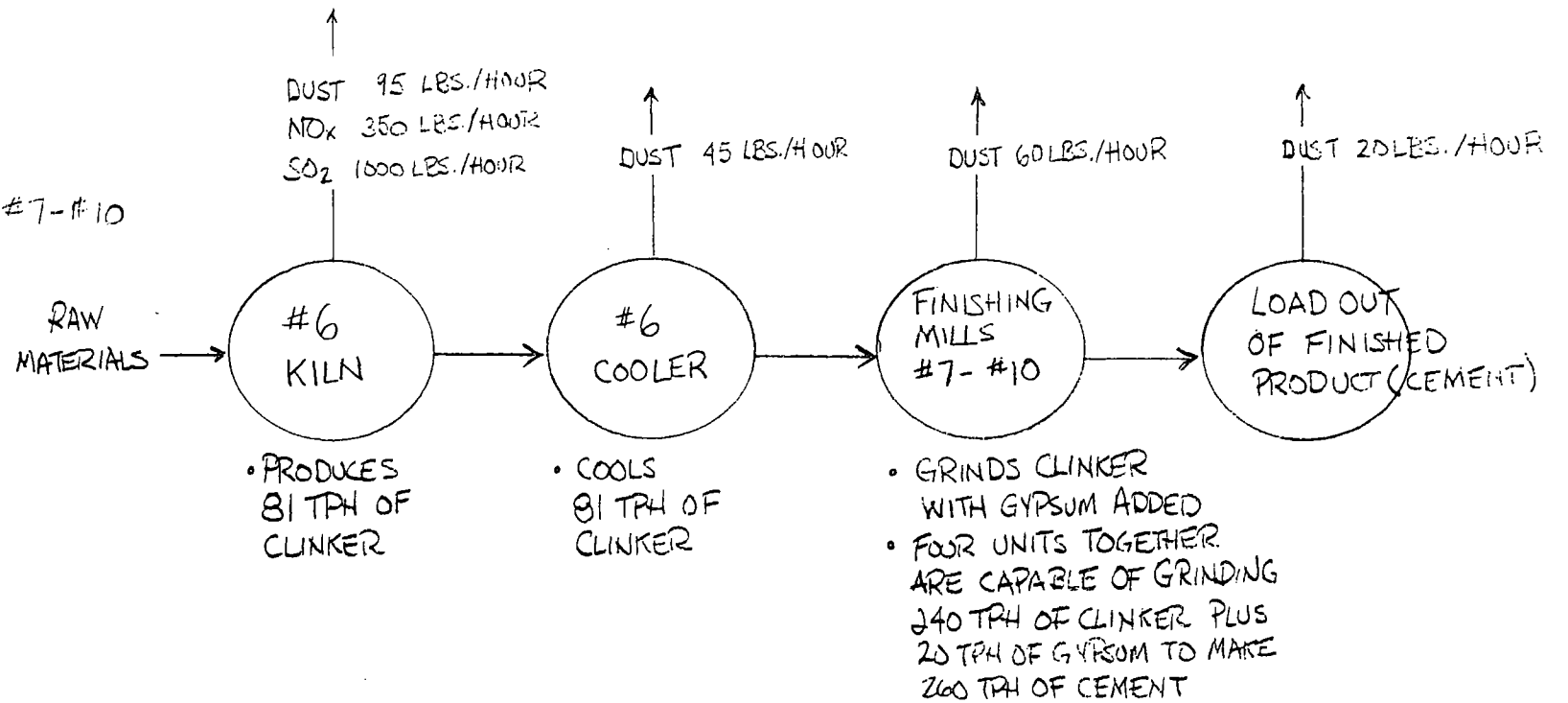
In order to get the bond money, General Portland agreed to limit through put of clinker, either domestically produced or imported, at this facility. Therefore, we propose that a specific condition be added to the construction permit. It could read as follows: "In the event the permittee operates kiln #6 and the importation system during the same calendar year, then the total combined clinker produced by kiln #6 and imported through the importation system shall be limited to 713,000 tons per year."

This condition would be in addition to specific condition #1 which currently appears in the draft. The 713,000 figure would not be appropriate for strictly importing clinker because the ship capacity is 20,000 tons. We do not feel it would be reasonable to have the thirty-sixth ship of the year carry less than a full load.

2. Dust collectors #26, #27, #29, and #30 are designed for flow in excess of 10,000 ACFM. Hillsborough County and the Southwest District of the D.E.R. as standard policy require a Method 2 to be performed along with the Method 9 test for baghouses of 10,000 ACFM or greater.
3. A fugitive emissions clause directed towards curtailing shiphold evacuation without controls should be added.

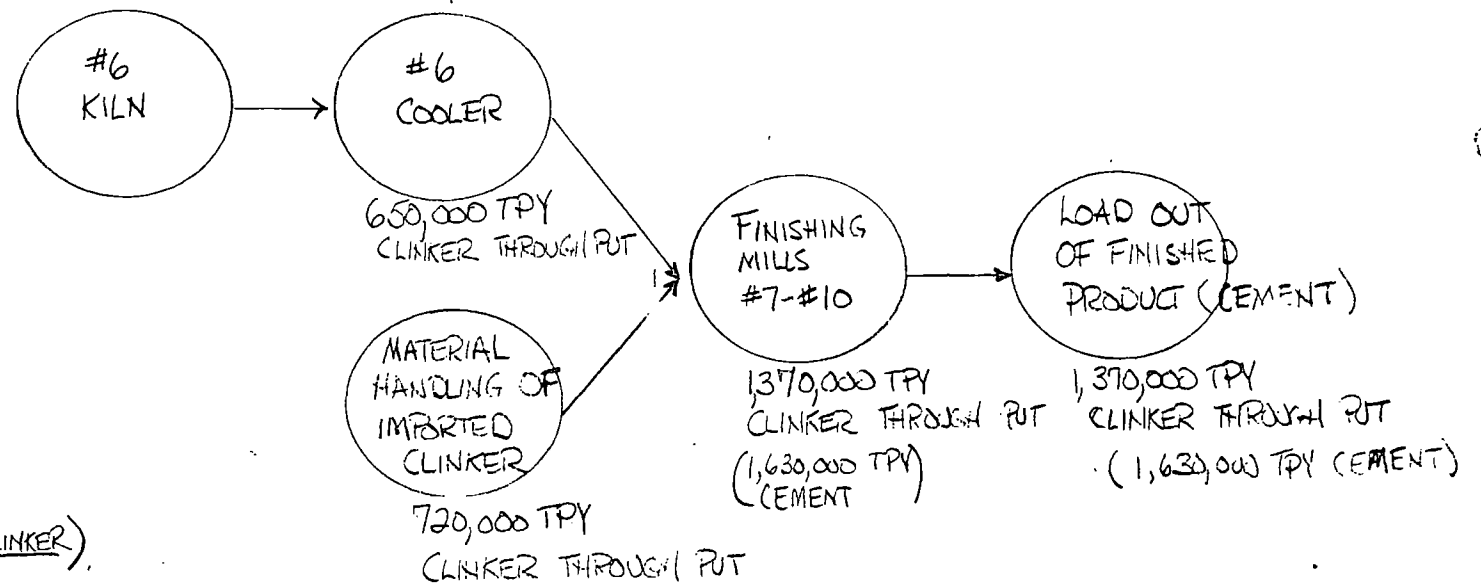
## EXISTING SYSTEM

- AT PRESENT #6 KILN AND COOLER CAN ONLY PRODUCE 1/3 OF THE CAPACITY AVAILABLE IN THE FINISHING MILLS #7-#10



## PROPOSED SYSTEM

- GENERAL PORTLAND'S REQUEST TO IMPORT 720,000 TPY OF CLINKER MORE THAN MATCHES THE 650,000 TPY\* THE #6 KILN CAN PRODUCE.
- THE FINISHING MILLS AND LOAD OUT SYSTEM COULD NOW MORE THAN DOUBLE THEIR HOURS OF OPERATION THUS DOUBLING THEIR DUST EMISSIONS.



\* THE PRODUCTION FIGURE OF 650,000 TPY ON THE KILN COMES FROM  $(.92) \left( \frac{8760 \text{ HOURS}}{1 \text{ YEAR}} \right) (81.4 \text{ TONS CLINKER})$  HOUR. THE .92 FIGURE REPRESENTS THE PERCENT OF TIME THAT THE KILN CAN OPERATE GIVEN REQUIRED MAINTENANCE.

THE TAMPA TRIBUNE  
 Published Daily  
 Tampa, Hillsborough County, Florida

State of Florida  
 County of Hillsborough

} 88.

DER  
 JAN 7 1985  
 BAQM

Before the undersigned authority personally appeared  
 G. T. Gleason, who on oath says that he is Controller of The Tampa Tribune, a daily  
 newspaper published at Tampa in Hillsborough County, Florida; that the attached copy  
 of advertisement being a

LEGAL NOTICE

NOTICE OF PROPOSED AGENCY ACTION ON PERMIT APPLICATION

in the matter of Notice that the State of FL., Dept. of Environ-  
 mental Regulation gives notice of its intent to issue a  
 permit to General Portland, Inc. to construct that which  
 is described herein.

was published in said newspaper in the issues of  
 December 22, 1984

Affiant further says that the said The Tampa Tribune is a newspaper published at  
 Tampa, in said Hillsborough County, Florida, and that the said newspaper has  
 heretofore been continuously published in said Hillsborough County, Florida, each day  
 and has been entered as second class mail matter at the post office in Tampa, in said  
 Hillsborough County, Florida, for a period of one year next preceding the first publica-  
 tion of the attached copy of advertisement; and affiant further says that he has neither  
 paid nor promised any person, firm, or corporation any discount, rebate, commission or  
 refund for the purpose of securing this advertisement for publication in the said  
 newspaper.

NOTARY PUBLIC  
 Sworn to and subscribed before me, this 2nd day  
 of January, A.D. 1985  
 (SEAL)

G. T. Gleason

Notary Public, State of Florida at Large  
 My Commission Expires Jan. 25, 1986

State of Florida  
 Department of  
 Environmental Regulation  
 Notice of Proposed  
 Agency Action on  
 Permit Application

The Department of Environ-  
 mental Regulation gives no-  
 tice of its intent to issue a per-  
 mit to General Portland, Inc.  
 to construct a clinker unload-  
 ing, storage and transfer facili-  
 ty, located at 2001 Maritime  
 Boulevard, Hillsborough Coun-  
 ty, Florida. A determination of  
 best available control technolo-  
 gy (BACT) was not required.

Persons whose substantial  
 interests are affected by the  
 Department's proposed per-  
 mitting decision may petition  
 for an administrative proceed-  
 ing (hearing) in accordance  
 with Section 120.57, Florida  
 Statutes. The petition must  
 conform to the requirements  
 of Chapters 17-103 and 28-5,  
 Florida Administrative Code,  
 and must be filed (received) in  
 the Office of General Counsel  
 of the Department at 2600  
 Blair Stone Road, Twin Tow-  
 ers Office Building, Tallahas-  
 see, Florida 32301, within  
 fourteen (14) days of publica-  
 tion of this notice. Failure to  
 file a request for hearing with-  
 in this time period shall  
 constitute a waiver of any  
 right such person may have to  
 request an administrative de-  
 termination (hearing) under  
 Section 120.57, Florida Stat-  
 utes.

If a petition is filed, the ad-  
 ministrative 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 preliminary  
 statement. Therefore, persons  
 who may not object to the pro-  
 posed agency action may  
 wish to intervene in the pro-  
 ceeding. A petition for inter-  
 vention must be filed pursuant  
 to Model Rule 28-5.207 at least  
 five (5) days before the final  
 hearing and be filed with the  
 hearing officer if one has been  
 assigned at the Division of  
 Administrative Hearings, De-  
 partment of Administration,  
 2009, Apalachee Parkway, Tal-  
 lahassee, Florida 32301. If no  
 hearing officer has been as-  
 signed, the petition is to be  
 filed with the Department's  
 Office of General Counsel,  
 2600 Blair Stone Road, Tal-  
 lahassee, Florida 32301. Failure  
 to petition to intervene within  
 the allowed time frame  
 constitutes a waiver of any  
 right such person has to re-  
 quest a hearing under Section  
 120.57, Florida Statutes.

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

Dept. of Environmental  
 Regulation  
 Southwest District  
 7601 Highway 301 N.  
 Tampa, Florida 33509  
 Hillsborough County  
 Environmental  
 Protection Commission  
 1900 9th Avenue  
 Tampa, Florida 33605  
 Dept. of Environmental  
 Regulation  
 Bureau of Air  
 Quality Management  
 2600 Blair Stone Road  
 Tallahassee, Florida 32301

Any person may send writ-  
 ten comments on the pro-  
 posed action to Mr. Bill Thom-  
 as at the department's Tal-  
 lahassee address. All comments  
 mailed within 30 days of the  
 publication of this notice will  
 be considered in the depart-  
 ment's final determination.

5403 12/22/84