

## OF HILLSBOROUGH

OCT 31 1984

DAOM

## MEMORANDUM

Date \_\_October 29 \_ 1984

To Ed	Svec, CAPS					· · · · · · · · · · · · · · · · · · ·			
From	Steve Gyor	og AUR	MOD	7					
		Incompletion Plant Modifi			Portland's	Proposed	Cement	Clinker	····
Subject.	Unloading	Plant Modifi	cation			· · · oposcu	00.110	<u> </u>	

The following items need to be addressed by General Portland to adequately review their application for a construction permit:

- 1. RACT requirements for particulate matter apply to this facility. Section II should reflect this.
- 2. The allowed emission rule of Section III is 17-2.650(2)(c)11. Only those individual sources which emit less than one ton per year follow 17-2.610.
- The emission stack geometry and flow characteristics for each of the control devices, Section III, must be submitted with the construction permit application.
- 4. The basis for the 0.03 gr/dscf outlet concentration efficiency used in the emission calculations is not specified in the application. A submittal from the manufacturer of the baghouses is required. The purchase specification sheets mentioned in the application were not attached.
- 5. The dust collectors at locations #20, #22, and #7A are sources of emissions from the clinker unloading process. As such, calculations showing the level of emissions from these three baghouses must be included in the application. Actual emissions of Section III Part C. should reflect the additional emissions.
- 6. The proposed conversion of the baghouse fan, General Portland's location #7A, from 34,000 ACFM to 6100 ACFM will require a modification to permit #A029-47654. General Portland must justify the proposed change in fan size for a baghouse designed for 34,000 ACFM.
- 7. The method of evacuating the shiphold following clinker unloading should be delineated.

If you have any questions, please contact me.