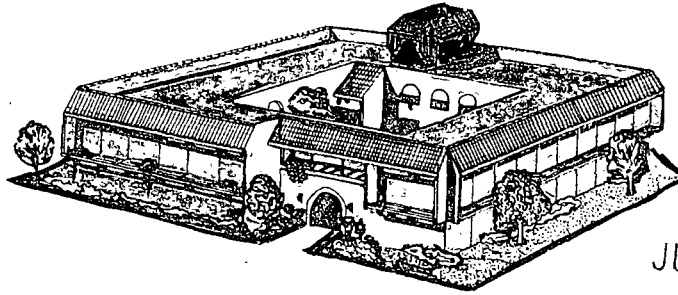


HILLSBOROUGH COUNTY
ENVIRONMENTAL PROTECTION

COMMISSION

RODNEY COLSON
RON GLICKMAN
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
JAMES D. SELVEY
PICKENS C. TALLEY II



ROGER P. STEWART
DIRECTOR

1900 - 9th AVE
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TELEPHONE (813) 272-5960

DER

JUL 24 1986

BAQM

MEMORANDUM

Date July 17, 1986

To Clair Fancy

From Victor San Agustin thru Jerry Campbell ^{VSA} _{Jc}

Subject: Proposed Ship Unloading of Cement at General Portland

The purpose of this memo to request that FDER consider the application incomplete and that you include the following requested additional information in your incompleteness letter to General Portland:

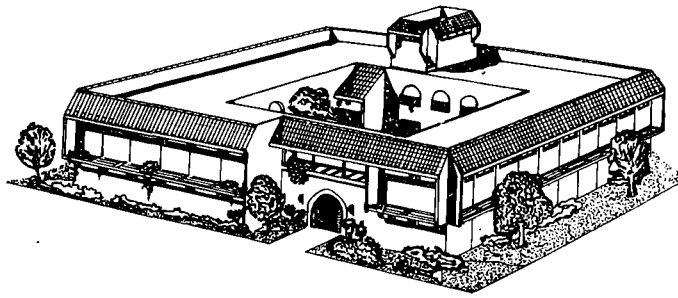
1. Pursuant to Chapter 1-6 of the HCEPC rules, please have them send a permit review fee of \$1,925 made payable to Hillsborough County Board of County Commissioners. We have determined separate fees are for 1) the vacuum system 2) the transfer of cement to the new 30,000 ton cement silo 3) the truck loadout of cement and associated pick-up points and 4) the 4 drag conveyors of the mill feed silos where emissions from each conveyor are controlled by a separate baghouse.
2. Existing baghouses currently permitted under A029-112043, 115401, and 115402 are permitted to handle clinker only. Refined cement is obviously dustier than clinker so we have reason to believe actual emissions from the baghouses will increase due to handling refined cement. General Portland's permit files show each baghouse guarantees an outlet grain loading of 0.02 gr/dscf if the inlet grain loading is at the most 8 gr/dscf. We also have reason to believe the inlet grain loading resulting from the use of refined cement would exceed this value. Conclusively, the proposed use of baghouses 26, 27, and 28 on refined cement could trigger a modification to the 3 operating permits. General Portland should verify and prove in writing whether the proposal will or will not trigger a permit modification. If it does, separate applications and application fees of \$1,155 are required.
3. Conversations with Bob Pretat of General Portland-Tampa indicate the vacuum hose at the hold will have enough suction to cause a negative pressure at the opening of the hold. Please have them verify this in writing; otherwise, General Portland needs to estimate maximum hourly and yearly particulate emissions from the hold.

*Essential part
of CAPS review*

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4. Emissions calculations show the average unloading time is 1733 hrs/yr. Is this the maximum permitted value which General Portland wants reflected in the permit? Do they also want to be permitted at a 520 TPH unloading rate? This was reported as just an average value.
5. General Portland should ensure the proposed project does not trigger New Source Review (NSR) requirements. This can be achieved by submitting a report of actual emissions increases resulting from this proposal and from the construction of the clinker unloading system. The emissions increase from the latter should include but are not limited to the yearly emissions increase resulting from the transport of clinker into open bay compartments, from the use of feed mill silos for storing clinker, and from baghouses 26, 27, and 28.

Thank you for your cooperation. If I can be of any assistance, please call.

cc: Bill Thomas, SWFDER
Maher Tanbouz, BAQM-CAPS

VSA/ch