

# 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

August 30, 1990

Ms. Mary F. Smallwood  
Ruden, Barnett, McClosky,  
Smith, Schuster & Russell, P.A.  
Monroe Park Tower, Suite 1010  
101 N. Monroe Street  
Tallahassee, Florida 32301

Dear Mary:

Re: General Portland Cement

The Bureau received comments from the United States Environmental Protection Agency in response to my June 28 letter requesting EPA's position on General Portland Cement's plans to restart existing Cement Kiln No. 6. I have enclosed their complete response, along with my letter to them, for your information. It appears as though the EPA will consider the kiln a new source that will be subject to NSPS and that the cogeneration facility may be subject to Prevention of Significant Deterioration.

If you would like to discuss this matter further, please call me at (904)488-1344.

Sincerely,

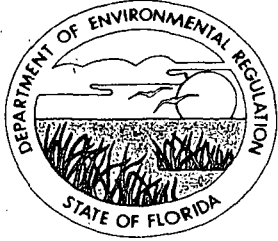
C. H. Fancy, P.E.

Chief

Bureau of Air Regulation

CHF/kt

cc: B. Thomas, SE District  
J. Campbell, HCEPC



## Florida Department of Environmental Regulation

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June 28, 1990

Ms. Jewell A. Harper, Chief  
Air Enforcement Branch  
Air, Pesticides, and Toxics  
Management Division  
U.S. EPA - Region IV  
345 Courtland Street, NE  
Atlanta, Georgia 30365

Dear Ms. Harper:

Re: General Portland Cement

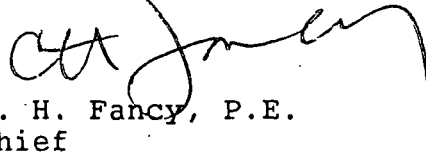
On June 5, Bureau staff met with General Portland Cement to discuss the possible starting up of their cement plant in Tampa. They wondered what rules might apply. The purpose of this letter is to ask EPA's opinion with regards to this proposed project. The company is investigating starting up the No. 6 kiln, the only one left at the site. It was installed in 1962 and was shut down on February 20, 1985. They are considering restarting the kiln as the Mexican cement companies have been taken to court for "dumping", and ocean freight costs have increased substantially. This kiln is about one quarter dismantled and the air pollution control system has been removed. They intend to install a baghouse for the air pollution control equipment. This is a dry process kiln and never had a state sulfur dioxide limit. The kiln was permitted for 81.4 tons per hour. In 1983, it was tested at 1,178 pounds per hour of SO<sub>2</sub> based upon a 55% coke feed of 5.44% sulfur and 45% coal with 2.3% sulfur. They also wish to investigate the construction of a 15 megawatt (120 million Btu/hr) cogeneration facility. They will enclose the material handling areas.

One of their concerns is they want to escape PSD review and bring in an existing boiler that would not be applicable to NSPS. The boiler they propose would fire coal with a sulfur content of less than 1%. They indicated that a new cement plant with a cogeneration facility would cost at least \$150 million and they estimate this rehabilitation project at about \$40 million. I have no way to substantiate those figures.

Ms. Jewell A. Harper  
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Any advice that you can provide us with regards to this project would be appreciated.

Sincerely

A handwritten signature in black ink, appearing to read 'C. H. Fancy', with a long, sweeping underline that extends to the right.

C. H. Fancy, P.E.  
Chief  
Bureau of Air Regulation

CHF/kt