



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30366

4APT-AEB

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Division of Air
Resources Management

Mr. Clair H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Applicability Determination for Lafarge Corporation

Dear Mr. Fancy:

In the May 24, 1991, letter from J. S. Wittmayer of Lafarge Corporation, we were requested to reevaluate our determination regarding New Source Performance Standards (NSPS) and Prevention of Significant Deterioration (PSD) applicability as explained in our August 23, 1990, letter regarding the reactivation of the No. 6 Portland cement kiln at their Tampa facility. Based upon the information in their letter and the June 19, 1991, letter from Darrel Graziani of the Hillsborough County EPC (attached), we have reevaluated our determinations.

PSD Applicability

In our August 23, 1990, letter, we had indicated that the PSD and/or nonattainment new source review (NSR) rules would apply if the shutdown of the No. 6 kiln was intended to be permanent. Lafarge has submitted information to indicate that the shutdown was intended to be temporary. In addition, Lafarge has indicated that even if the existing ESP had not been removed when it was, it would still have needed to be replaced due to age and deterioration.

If the decision is made by FDER that the shutdown was indeed temporary, then PSD would not apply to Kiln No. 6; however, PSD may or may not apply to the construction of the cogeneration unit based upon whether or not the increases in emissions from the facility are significant. The cogeneration unit is clearly a support unit for the facility.

NSPS Applicability

We do not believe that the No. 6 kiln, after reactivation, will be subject to 40 C.F.R. Part 60, Subpart F provided that a control device at least as efficient as the previous ESP is installed whereby there would not be an emissions increase that would trigger the

modification provisions of NSPS. If the cogeneration facility is an existing boiler, NSPS should not apply provided that it is not modified or reconstructed as defined in §60.14 or §60.15, respectively.

If you have any questions on this letter, please contact Mr. Brian Beals of my staff at (404) 347-5014.

Sincerely yours,

Mark Armentrout

for Jewell A. Harper, Chief
Air Enforcement Branch
Air, Pesticides, and Toxics
Management Division

Attachment

11-12-91
CHF
FYI. Please
review, initials &
return to Patty for
filing. Thanks,
Ben
cc'd: Barry, Dannel G., Bill Thomas
HEPC SWD

Patty - 11-13
pls send a copy of
this to Jim Esther
Bill Thomas
Jerry Campbell
done
11-13 PA
Claw

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June 19, 1991

Mr. Paul Reinerman
Air Enforcement Branch
Air, Pesticides and Toxics
Management Division
U.S. EPA - Region IV
345 Courtland Street, NE
Atlanta, GA 30365

Re: Lafarge Corporation (formerly General Portland Cement)
Kiln No. 6 (NEDS 0018-29)

Dear Mr. Reinerman:

Please be advised that I have reviewed Lafarge's letter of May 24, 1991, to Jewell harper and would like to offer the following comments to help you in developing your response. Specifically:

Kiln Status

The kiln last went through modification in 1975 with the submittal of an application (attached) to modify the kiln and was authorized (A029-2433) as proposed. The modification outlined three (3) types of fuels [Type A - 100% #6 fuel oil (2.58% Sulfur), Type B - 20% #6 fuel oil (2.58% Sulfur) and 80% Coke (3.44% Sulfur), Type C - 100% Coal (2-6% Sulfur)] which would be used.

In May 1984, General Portland announced a temporary shutdown (1-5 years) of the kiln for economic reasons during a meeting with the DER and EPC/HC (record attached). Currently the kiln is permitted under the shutdown provision of 17-2.210(2)(c) and (2)(d), Florida Administrative Code (F.A.C.).

Reactivation of the Kiln

Currently Lafarge is authorized to start-up the kiln under permit no. A029-174609. This authorization is limited to the kiln as it was last operated in 1985 and does not authorize the addition of a waste heat recovery boiler. In addition, the permit requires notification and assurance that the reactivation will not trigger NSPS requirements.

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If Lafarge reconstructs the kiln with a waste heat recovery boiler a modification (State definition) will occur and require review under either 17-2.500 PSD, 17-2.510 NSR or 17-2.520 Sources Not Subject to PSD or NSR Requirements. The level of review will be dependent above Lafarge's requested total allowable emission levels from the kiln and waste heat recovery boiler. Baseline (actual) emissions should be calculated based on calendar years 1981 and 1982 as the most representative years. It is my understanding that Lafarge is attempting to use a stack test conducted in June 1983 to identify actual emission levels of sulfur dioxide. Be advised that the test was not performed under normal operating conditions and, in fact, was part of a larger test attempting to evaluate particulate and sulfur dioxide emissions associated with the burning of a 45% Coal/55% Coke mixture. Authorization was apparently provided for the test as reported by General Portland (record attached).

Pollution Control Equipment

The kiln is currently authorized to operate with a Western Precipitation electrostatic precipitator any replacement will require pre-authorization by both the EPC/HC and FDER. "Authorization" is required to insure that the replacement meets or exceeds the old units performance and should not be confused with "modification".

NSPS Reconstruction

Lafarge's procedures for determining reconstruction costs appear to be inconsistent with the Federal definition of "reconstruction" and the designation of an affected facility. Lafarge needs to address the reconstruction costs of each of the affected facilities identified in 40 CFR 60.60(a). A comparison of the reconstruction cost to cost of a new comparable facility must then be made for each affected facility individually. The same reconstruction methodology should be followed for the waste heat recovery boiler.


NSPS Modification

Lafarge's assumption that the "physical or operation change" to the kiln was the removal of ESP is inconsistent with the NSPS modification regulation (40 CFR 60.14). The replacement of the control equipment is clearly not a trigger for modification since Lafarge can easily meet or exceed the performance level of the old ESP. The addition of the waste heat recovery boiler does raise the applicability question. As far as particulate matter emissions, the kiln should be able to exempt out of NSPS modification with the right control equipment. However, the boiler must show a reduction in both nitrogen oxides and particulate matter while not exceeding the reconstruction costs. In addition, total stack emissions from the combined cycle system must be reviewed.

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In conclusion, the reactivation of the kiln as proposed will result in the submittal of a construction/modification application in accordance with State regulations. At that time the State and local agencies will be able to review the entire project and determine emission levels and applicable regulations. I hope these comments help you in the development of your response. If you have any questions please feel free to contact me at (813) 272-5530.

Sincerely,



Darrel J. Graziani
Chief, Air Permitting Section

bm

Attachments

cc: J. Harry Kerns, P.E., FDER - Tampa
Clair Fancy, P.E., FDER - Tallahassee
John Wittmayer, Lafarge - Texas