

272-5530

COMMISSION
PHYLLIS BUSANSKY
RODNEY COLSON
PAM IORIO
RUBIN E. PADGETT
JAN KAMINIS PLATT
HAVEN POE
JAMES D. SELVEY



ROGER P. STEWART
EXECUTIVE DIRECTOR
MAIN OFFICES
1900 - 9TH AVENUE
TAMPA, FLORIDA 33605
TELEPHONE (813) 272-5960
AIR PROGRAM
TELEPHONE (813) 272-5530
WASTE MANAGEMENT PROGRAM
TELEPHONE (813) 272-5788

RECEIVED

AUG 13 1990

MEMORANDUM

DER-BAQM Date August 7, 1990

To Clair Fancy
From Jerry Campbell *JE*
Subject: Sulfur Dioxide Standard for LaFarge's #6 Kiln

As you recall, we attended a meeting with LaFarge representatives in DARM's office back in June. They called it to discuss the rule applicability regarding their proposal to restart the kiln with a cogeneration capability. Coincidentally their operating permit for the kiln was up for renewal, and we had recommended the permit include an SO₂ standard. This is a major source of SO₂ with no construction permit and it operated prior to the NSR rules of 1977. The old permit did not include a specific number and our pound per hour figure has caused them some concern. The permit has been issued, and LaFarge has requested and received an extension to file for a hearing. We have met with them and we are attempting to resolve the matter.

Given the above background and the attached information, we are seeking your assistance. Our intention is to establish an SO₂ baseline and if appropriate include it as an enforceable standard in their renewed permit. By taking the most recent two years of representative data (1983 and 1984), we calculate the baseline to be 3134 tons of SO₂ per year. This is based on the original Annual Operating Reports and applying a sulfur conversion factor of 76.4%. This comes from actual test data from 7/2/79 and correlates to 76% of the sulfur in the fuel being emitted as SO₂. The other 24% is tied up in the alkaline product.

You will note that our calculations do not agree with LaFarge's as originally submitted. We derived our figures from the sulfur content and amount of fuel burned each year. LaFarge ignored the actual fuel data and used old stack tests (in most instances from previous years). As such, we feel our data is more representative.

Subject to your concurrence then, we will ask the district to amend the permit to exclude the hourly SO₂ limitation, but include the following:

"Pursuant to Rule 17-2.500, F.A.C., and Chapter 1-1.07, Rules of the Environmental Protection Commission, sulfur dioxide emissions from the operation of the kiln shall not exceed 3134 tons for any twelve consecutive month period."

Compliance with this condition shall be demonstrated by using fuel analysis and production records on a monthly basis to calculate emissions.

Clair Fancy
August 7, 1990
Page 2

Because of the pending hearing, we respectfully request your prompt attention to this matter. Please contact me if you need any further information.

cg

cc: Gary Maier

9/7
John Reynolds
please call Campbell
& see if EPA response
that he got a copy of
will suffice, or if he needs
more. If he does, please
have something in sign
by Sept 17. I'll be
on vacation w/out me
CALLED 9/11
NO FURTHER ACTION NEEDED.
Clair
JR

Sulfur Dioxide Emissions From LaFarge's #6 Kiln Operation

<u>Year</u>	<u>Tons Clinker Produced</u>	<u>Fuel Types/Utilization Rates</u>			<u>SO₂ Emissions Original AOR</u>	<u>EPC's 1990 Calculations</u>	
		<u>Coal (%S)/TPY</u>	<u>F.O. (%S)gal/yr</u>	<u>Coke (%S)/TPY</u>		<u>100% Conversion</u>	<u>76% Conversion</u>
1978	513,455	2.14/100,392	2.2/755,000	-	3,888	4,431	3,386
1979	481,708	0.878/100,188	2.2/169,000	-	2,806	1,789	1,367
1980	453,971	2.6/86,804	-	-	2,572	4,514	3,449
1981	529,127	2.56/108,733	-	-	2,910	5,567	4,253
1982	502,360	2.1/98,068	-	-	2,910	4,119	3,147
1983	505,126	2.53/88,475	-	2	2,853	4,477	3,420
1984	481,402	2.00/93,169	-	-	4,026	3,727	2,847
1985	55,817	N/A	-	-	510	-	-

1. 76% conversion of sulfur in fuel to SO₂ is based on actual test data from 7/2/79.
2. No coke usage was reported in the AOR, but one stack test was conducted in 1983 while burning a 55% coke mixture.