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Poor Quality Original

MEMORANDUM

Date August 7, 1990

To Clair Fancy
From Jerry Campbell *JC*
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.

mod. Great NSR...

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 several 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 data submitted. We derived our figures from the sulfur content of the fuel burned each year. LaFarge ignored the actual fuel analysis and stack tests (in most instances from previous years) and our data is more representative.

Subject to your concurrence then, we will ask the district to include the permit to exclude the hourly SO₂ limitation, but include the following:
"Pursuant to Rule 17-2.500, F.A.C., and Chapter 1-1.05, Rules of the Environmental Protection Commission, sulfur dioxide emissions during 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 operation 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

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85049226979 P.04

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50.00 lbs/ton of sulfur from sulfur dioxide

Year	Tons Clinker Produced	Fuel Types/Utilization Rates			Sulfur Conversion Rate	Sulfur Production Rate	Sulfur Production Total
		Coal (3S)/TPY	P.O. (3S) (gal)/yr	Coke (3S)/TPY			
1978	513,455	2.14/100,392	2.2/755,000	-	3.34	1,714	
1979	481,708	0.878/100,138	2.2/169,000	-	3.078	1,584	
1980	453,971	2.6/86,304	-	-	2.6	1,180	
1981	529,127	2.56/108,733	-	-	2.56	1,354	
1982	502,360	2.1/98,068	-	-	2.1	1,067	
1983	505,126	2.53/88,475	-	-	2.53	1,278	
1984	481,402	2.00/93,000	-	-	2.0	963	
1985	95,817	N/A	-	-	-	-	

> avg 3.134

1. 7% conversion of sulfur in fuel to SO₂ is based on actual test results.
2. No coke usage was reported in the sulfur dioxide plant for 1978-1985.

TO
1985-1988-1996-1997-1998-1999-2000-2001-2002-2003-2004-2005-2006-2007-2008-2009-2010-2011-2012-2013-2014-2015-2016-2017-2018-2019-2020-2021-2022-2023-2024-2025-2026-2027-2028-2029-2030-2031-2032-2033-2034-2035-2036-2037-2038-2039-2040-2041-2042-2043-2044-2045-2046-2047-2048-2049-2050-2051-2052-2053-2054-2055-2056-2057-2058-2059-2060-2061-2062-2063-2064-2065-2066-2067-2068-2069-2070-2071-2072-2073-2074-2075-2076-2077-2078-2079-2080-2081-2082-2083-2084-2085-2086-2087-2088-2089-2090-2091-2092-2093-2094-2095-2096-2097-2098-2099-2100-2101-2102-2103-2104-2105-2106-2107-2108-2109-2110-2111-2112-2113-2114-2115-2116-2117-2118-2119-2120-2121-2122-2123-2124-2125-2126-2127-2128-2129-2130-2131-2132-2133-2134-2135-2136-2137-2138-2139-2140-2141-2142-2143-2144-2145-2146-2147-2148-2149-2150-2151-2152-2153-2154-2155-2156-2157-2158-2159-2160-2161-2162-2163-2164-2165-2166-2167-2168-2169-2170-2171-2172-2173-2174-2175-2176-2177-2178-2179-2180-2181-2182-2183-2184-2185-2186-2187-2188-2189-2190-2191-2192-2193-2194-2195-2196-2197-2198-2199-2200-2201-2202-2203-2204-2205-2206-2207-2208-2209-2210-2211-2212-2213-2214-2215-2216-2217-2218-2219-2220-2221-2222-2223-2224-2225-2226-2227-2228-2229-2230-2231-2232-2233-2234-2235-2236-2237-2238-2239-2240-2241-2242-2243-2244-2245-2246-2247-2248-2249-2250-2251-2252-2253-2254-2255-2256-2257-2258-2259-2260-2261-2262-2263-2264-2265-2266-2267-2268-2269-2270-2271-2272-2273-2274-2275-2276-2277-2278-2279-2280-2281-2282-2283-2284-2285-2286-2287-2288-2289-2290-2291-2292-2293-2294-2295-2296-2297-2298-2299-2300-2301-2302-2303-2304-2305-2306-2307-2308-2309-2310-2311-2312-2313-2314-2315-2316-2317-2318-2319-2320-2321-2322-2323-2324-2325-2326-2327-2328-2329-2330-2331-2332-2333-2334-2335-2336-2337-2338-2339-2340-2341-2342-2343-2344-2345-2346-2347-2348-2349-2350-2351-2352-2353-2354-2355-2356-2357-2358-2359-2360-2361-2362-2363-2364-2365-2366-2367-2368-2369-2370-2371-2372-2373-2374-2375-2376-2377-2378-2379-2380-2381-2382-2383-2384-2385-2386-2387-2388-2389-2390-2391-2392-2393-2394-2395-2396-2397-2398-2399-2400-2401-2402-2403-2404-2405-2406-2407-2408-2409-2410-2411-2412-2413-2414-2415-2416-2417-2418-2419-2420-2421-2422-2423-2424-2425-2426-2427-2428-2429-2430-2431-2432-2433-2434-2435-2436-2437-2438-2439-2440-2441-2442-2443-2444-2445-2446-2447-2448-2449-2450-2451-2452-2453-2454-2455-2456-2457-2458-2459-2460-2461-2462-2463-2464-2465-2466-2467-2468-2469-2470-2471-2472-2473-2474-2475-2476-2477-2478-2479-2480-2481-2482-2483-2484-2485-2486-2487-2488-2489-2490-2491-2492-2493-2494-2495-2496-2497-2498-2499-2500-2501-2502-2503-2504-2505-2506-2507-2508-2509-2510-2511-2512-2513-2514-2515-2516-2517-2518-2519-2520-2521-2522-2523-2524-2525-2526-2527-2528-2529-2530-2531-2532-2533-2534-2535-2536-2537-2538-2539-2540-2541-2542-2543-2544-2545-2546-2547-2548-2549-2550-2551-2552-2553-2554-2555-2556-2557-2558-2559-2560-2561-2562-2563-2564-2565-2566-2567-2568-2569-2570-2571-2572-2573-2574-2575-2576-2577-2578-2579-2580-2581-2582-2583-2584-2585-2586-2587-2588-2589-2590-2591-2592-2593-2594-2595-2596-2597-2598-2599-2600-2601-2602-2603-2604-2605-2606-2607-2608-2609-2610-2611-2612-2613-2614-2615-2616-2617-2618-2619-2620-2621-2622-2623-2624-2625-2626-2627-2628-2629-2630-2631-2632-2633-2634-2635-2636-2637-2638-2639-2640-2641-2642-2643-2644-2645-2646-2647-2648-2649-2650-2651-2652-2653-2654-2655-2656-2657-2658-2659-2660-2661-2662-2663-2664-2665-2666-2667-2668-2669-2670-2671-2672-2673-2674-2675-2676-2677-2678-2679-2680-2681-2682-2683-2684-2685-2686-2687-2688-2689-2690-2691-2692-2693-2694-2695-2696-2697-2698-2699-2700-2701-2702-2703-2704-2705-2706-2707-2708-2709-2710-2711-2712-2713-2714-2715-2716-2717-2718-2719-2720-2721-2722-2723-2724-2725-2726-2727-2728-2729-2730-2731-2732-2733-2734-2735-2736-2737-2738-2739-2740-2741-2742-2743-2744-2745-2746-2747-2748-2749-2750-2751-2752-2753-2754-2755-2756-2757-2758-2759-2760-2761-2762-2763-2764-2765-2766-2767-2768-2769-2770-2771-2772-2773-2774-2775-2776-2777-2778-2779-2780-2781-2782-2783-2784-2785-2786-2787-2788-2789-2790-2791-2792-2793-2794-2795-2796-2797-2798-2799-2800-2801-2802-2803-2804-2805-2806-2807-2808-2809-2810-2811-2812-2813-2814-2815-2816-2817-2818-2819-2820-2821-2822-2823-2824-2825-2826-2827-2828-2829-2830-2831-2832-2833-2834-2835-2836-2837-2838-2839-2840-2841-2842-2843-2844-2845-2846-2847-2848-2849-2850-2851-2852-2853-2854-2855-2856-2857-2858-2859-2860-2861-2862-2863-2864-2865-2866-2867-2868-2869-2870-2871-2872-2873-2874-2875-2876-2877-2878-2879-2880-2881-2882-2883-2884-2885-2886-2887-2888-2889-2890-2891-2892-2893-2894-2895-2896-2897-2898-2899-2900-2901-2902-2903-2904-2905-2906-2907-2908-2909-2910-2911-2912-2913-2914-2915-2916-2917-2918-2919-2920-2921-2922-2923-2924-2925-2926-2927-2928-2929-2930-2931-2932-2933-2934-2935-2936-2937-2938-2939-2940-2941-2942-2943-2944-2945-2946-2947-2948-2949-2950-2951-2952-2953-2954-2955-2956-2957-2958-2959-2960-2961-2962-2963-2964-2965-2966-2967-2968-2969-2970-2971-2972-2973-2974-2975-2976-2977-2978-2979-2980-2981-2982-2983-2984-2985-2986-2987-2988-2989-2990-2991-2992-2993-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ENVIRONMENTAL PROTECTION COMMISSION
of Hillsborough County

FAX Transmittal Sheet

DATE: AUG 7, 1993

TO: CLARE FANCY

FAX Phone: 813-272-5979 Voice Phone: 813-272-3400

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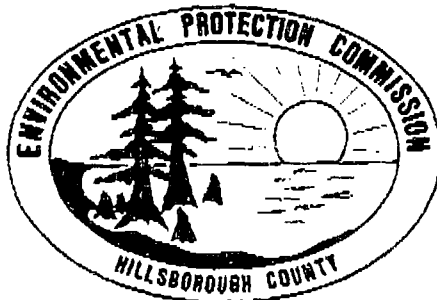
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FROM: TERESA CAMPBELL (circle applicable items below)

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SPECIAL INSTRUCTIONS: _____

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MEMORANDUM

Date August 7, 1990

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

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*modification
NSPS
for PM?
Subject*

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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:

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

*EPA
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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

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Sulfur Dioxide Emissions From LaFarge's #6 Mill Operation

Year	Tons Clinker Produced	Fuel Types/Utilization Rates			SO ₂ Emissions Original TSP	EPC's 1990 Calculations	
		Coal (%S)/TPY	F.O. (%S)gal/y.	Coke (%S)/TPY		100% Conversion	76% Conversion
1978	513,455	2.14/100,392	2.2/755,000	-	-	4,431	3,386
1979	481,708	0.878/100,188	2.2/168,000	-	-	1,789	1,357
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1982	502,360	2.1/98,068	-	-	2,910	4,119	3,147
1983	505,126	2.53/88,475	-	2	3,653	4,477	3,420
1984	481,402	2.00/93,169	-	-	4,026	3,727	2,817
1985	55,817	N/A	-	-	510	-	-

avg 3,134

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 mill but one stack test was conducted in 1983 while burning a 55% coke mixture.

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TO
18126

TOTAL P.04