

Koerner, Jeff

From: George Townsend [gtownsend@americancementcompany.com]
Sent: Thursday, February 28, 2008 10:39 AM
To: Koerner, Jeff
Cc: 'Cary Cohrs'; wwall@americancementcompany.com
Subject: RE: On Spec. Used Oil - Air Heater

Jeff,

Please find below the answer to your questions. It is my understanding the by maintaining the permitted volume (1.5 million gallons) burned in the kiln, calciner or air heater, the amendment to the permit will be by letter and will not require public comment.

1. Are you requesting the ability to also fire on-specification used oil in the air heater, which will be included in the current fuel cap (1,500,000 gallons/12 months from the kiln + calciner + air heater)?

Yes

2. Describe how you will demonstrate compliance with the limit (e.g., fuel flow monitors (kiln, calciner and air heater) with totalizes and record keeping).

The volume of used oil burned at either location will be tracked with a totalizer and electronically flagged as to fuel type. The recordkeeping will encompass daily, monthly and annually volumes for fuel types.

3. Describe the control devices through which the air heater exhaust will pass. Explain affects on other pollutants such as metals from the on-specification used oil. Will the moist limestone in the raw mill adsorb/absorb SO₂?

The combined emissions for the pyroprocess and the air heater/raw mill circuit are controlled by a common baghouse and exhaust through a common stack. There will be absorption/adsorption of SO₂ by limestone in the raw mill circuit.

4. Will there be any expected increase in emissions? Explain how SO₂, THC/VOC, NO_x, CO (and even Hg) emissions from the air heater are accounted by the CEMS.

There will be no expected increases in emissions from the use of on-spec used oil as opposed to No. 4 fuel oil and as mention earlier, the air heater/raw mill circuit and the pyroprocess exhaust through a common stack and the CEM system, monitoring the pollutants mentioned, is on this stack.

George Townsend
 Environmental Manager
 American Cement Company, LLC
 4750 E CR 470, P.O. Box 445
 Sumterville, FL 33585
 Phone: 352-569-5393
 Cell: 352-502-8029
 Fax: 352-569-5397
gtownsend@americancementcompany.com

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3/11/2008

From: Koerner, Jeff [mailto:Jeff.Koerner@dep.state.fl.us]
Sent: Wednesday, February 27, 2008 5:58 PM
To: George Townsend
Cc: Cary Cohrs
Subject: RE: On Spec. Used Oil - Air Heater

George,

I have your initial letter.

Just provide a response to the following questions and we'll go from there.

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

1. Are you requesting the ability to also fire on-specification used oil in the air heater, which will be included in the current fuel cap (1,500,000 gallons/12 months from the kiln + calciner + air heater)?
2. Describe how you will demonstrate compliance with the limit (e.g., fuel flow monitors (kiln, calciner and air heater) with totalizes and record keeping).
3. Describe the control devices through which the air heater exhaust will pass. Explain affects on other pollutants such as metals from the on-specification used oil. Will the moist limestone in the raw mill adsorb/absorb SO₂?
4. Will there be any expected increase in emissions? Explain how SO₂, THC/VOC, NO_x, CO (and even Hg) emissions from the air heater are accounted by the CEMS.

Thanks,

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
850/921-9536

More than 3,000 retail pharmacies in Florida are now a part of the Florida Discount Drug Card program.
See www.FloridaDiscountDrugCard.com for more info or call toll-free, 1-866-341-8894

From: George Townsend [mailto:gtownsend@americancementcompany.com]
Sent: Wednesday, February 27, 2008 2:11 PM
To: Koerner, Jeff
Cc: Cary Cohrs; wwall@americancementcompany.com
Subject: On Spec. Used Oil - Air Heater

In regards to the discussions we have had on the burning of used oil in the air heater. American Cement has decided to take the option of burning used oil in the air heater and maintaining the currently permitted annual volume of 1.5 million gallons per year. Please let me know; procedurally, what I must do to formalize the decision.

George Townsend
Environmental Manager
American Cement Company, LLC
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Koerner, Jeff

From: Koerner, Jeff
Sent: Wednesday, February 27, 2008 5:58 PM
To: 'George Townsend'
Cc: Cary Cohrs
Subject: RE: On Spec. Used Oil - Air Heater
Attachments: RE: On-spec Used oil at new cement plant

George,

I have your initial letter.

Just provide a response to the following questions and we'll go from there.

1. Are you requesting the ability to also fire on-specification used oil in the air heater, which will be included in the current fuel cap (1,500,000 gallons/12 months from the kiln + calciner + air heater)?
2. Describe how you will demonstrate compliance with the limit (e.g., fuel flow monitors (kiln, calciner and air heater) with totalizers and record keeping).
3. Describe the control devices through which the air heater exhaust will pass. Explain affects on other pollutants such as metals from the on-specification used oil. Will the moist limestone in the raw mill adsorb/absorb SO₂?
4. Will there be any expected increase in emissions? Explain how SO₂, THC/VOC, NO_x, CO (and even Hg) emissions from the air heater are accounted by the CEMS.

Thanks,

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
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To: Koerner, Jeff
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In regards to the discussions we have had on the burning of used oil in the air heater. American Cement has decided to take the option of burning used oil in the air heater and maintaining the currently permitted annual volume of 1.5 million gallons per year. Please let me know; procedurally, what I must do to formalize the decision.

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Koerner, Jeff

From: Koerner, Jeff
Sent: Friday, February 01, 2008 11:38 AM
To: 'gtownsend@americancementcompany.com'
Subject: On-specification Used Oil for Raw Mill Air Heater at New Cement Plant

George,

I have your letter regarding the above issue and have discussed this with Al Linero.

I checked the original application and it looks as if the plant intended to fire only natural gas and distillate oil (No. 2 and No. 4). The current permit specifies these fuels for the air heater. In addition, the current permit specifies the following limits for firing on-specification used oil, "... shall not exceed 1000 gallons per hour and 1,500,000 gallons during any consecutive 12 months." I have a few questions.

1. Are you requesting the ability to fire on-specification used oil in the air heater *in addition to* the amount permitted for the kiln and calciner (> 1000 gph and > 1,500,000 gallons/12 months)?
2. If the request is to also fire on-specification used oil in the air heater and still comply with the permits limits (kiln + calciner + air heater), describe how you will demonstrate compliance with each limit.
3. Describe the control devices through which the air heater exhaust will pass. Explain affects on other pollutants such as metals from the on-specification used oil. Will the moist limestone in the raw mill adsorb/absorb SO₂?
4. Explain how SO₂, THC/VOC, NO_x, CO (and even Hg) emissions from the air heater are accounted by the CEMS.

Please call if you would like to discuss.

Thanks!

Jeff Koerner, BAR - New Source Review Section
Florida Department of Environmental Protection
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