

Department of Environmental Protection

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

David B. Struhs Secretary

February 10, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Scott Quaas Environmental Manager Tarmac America Inc. 455 Fairway Drive Deerfield Beach, Florida 33441

Re: DEP File No. 0250020-007-AC (PSD-FL-142A)

Tarmac Pennsuco Portland Cement Plant, Miami-Dade County

Modification of Coal Conversion Project - Kiln No. 2

Dear Mr. Quaas:

The Department reviewed the application received on February 18, 1998 by the Miami-Dade Department of Environmental Resources Management (DERM). By agreement with DERM, the Department is acting on your request:

Kiln No. 2 was previously converted from gas to direct-fired coal burning. Tarmac proposes to switch to indirect firing for the purpose of reducing nitrogen oxides emissions. Primary air will be introduced to the kiln independently of the coal or secondary air. Secondary air will continue to be drawn from the clinker cooler. This greater control over the primary air to the kiln is expected by Tarmac to result in substantial NO_X reductions for the purpose of complying with the original permit conditions applicable to the conversion of Kiln No. 2 to coal burning.

A new pulverized coal bin will be added downstream of the coal mill. Air from the coal mill will be exhausted through a new baghouse serving the coal bin. Pulverized coal from the coal bin and a small portion of air will be conveyed to the kiln, separately from the primary combustion air.

The existing coal handling system for the cement plant will be utilized for the Kiln No. 2 indirect system, including the coal mill. New screw feeders, weigh feeders, coal blower, and burner pipe will also be installed for the proposed modification. Particulate emissions from the pulverized coal bin will be controlled by a new baghouse.

The existing construction permit numbered AC13-169901 (PSD-FL-142) is hereby modified (amended) as follows:

Permit Expiration: Permit PSD-FL-142 (AC13-169901) is hereby extended to July 1, 2000.

NEW SPECIFIC CONDITIONS

16. <u>Nitroger Oxides Emissions</u>: Nitrogen oxides emissions shall be controlled by combustion controls including implementation of indirect-firing. [Tarmac - DERM Agreement signed January 30 and February 2, 1998]

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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- 17. Construction: Construction related to the implementation of indirect firing, including the new coal bin and baghouse, shall be completed within 12 months after issuance of this permit modification.

 [Tarmac DERM Agreement signed January 30 and February 2, 1998]
- 18. General Visible Emissions Standard: Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer, or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density if which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20% opacity). The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1, F.A.C.]
- 19. Coal Bin and Baghouse Emissions: The maximum permitted allowable particulate emission rate from the new coal bin and baghouse shall not exceed 0.94 pounds per hour and 3.7 tons per year. [Applicant, Rule 62-4.070(3) F.A.C.]
- 20. Coal Bin and Baghouse Opacity: The permittee may demonstrate compliance with the allowable permitted emission rate by adhering to an opacity limit of 5% or less in lieu of particulate stack tests. If the Department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it may require that compliance be demonstrated by the test method specified in the applicable rule. [Rule 62-297.620(4), F.A.C.]
- 21. <u>Test Methods</u>: Compliance with the allowable emission limiting standards listed in Specific Condition 20 and 21 shall be determined by using the following reference methods as described in 40 CFR 60, Appendix A (1997, version) adopted by reference in Chapter 62-204, F.A.C.
 - Method 9 Visual Determination of the Opacity of Emissions from Stationary Sources initially and annually thereafter.
 - Method 5 Determination of Particulate Matter Emissions from Stationary Sources (if required).

This permit modification is issued pursuant to Chapter 403, Florida Statutes. Any party to this order (permit modification) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 (.hirty) days from the date this Notice is filed with the Clerk of the Department.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Sincerely.

Howard L. Rhodes, Director Division of Air Resources

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Management

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 2-12-99 to the person(s) listed:

Scott Quaas, Tarmac*
Hardy Johnson, Tarmac
Gregg Worley, EPA
Isidore Goldman, DEP SED
H. Patrick Wong, DERM
Donna Edwards, DERM
David Buff, P.E., Golder Associates

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

2-12-99 k) (Date)

FINAL DETERMINATION

Tarmac America Inc.
Portland Cement Manufacturing Facility
Modification of Kiln No. 2 Coal Conversion Project

Miami-Dade County

DEP File No. 0250020-007-AC (PSD-FL-142A)

An Intent to Issue an air construction permit, authorizing the modification of Kiln No.2 at the Tarmac America Inc facility was distributed on December 22, 1998. This facility is located at 455 Fairway Drive, Deerfield Beach in Miami, Dade County, Florida.

The Public Notice of Intent to Issue Air Construction Permit was published in the Miami Daily Business Review on January 13, 1999.

No comments were received as a result of the public notice.

The final action of the Department will be to issue the permit as noticed.

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Florida Department of Environmental Protection

TO:

Howard L. Rhodes

THRU:

Clair Fancy

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FROM:

Teresa Heron T. H

DATE:

February 9, 1999

SUBJECT:

Tarmac Pennsucco Cement Plant

Kiln No. 2 Coal Conversion Project Modification

DEP File 0250020-007-AC (PSD-FL-142A)

Attached is a construction permit modification for Kiln No. 2 at the Tarmac's Portland Cement Manufacturing facility in Medley, Miami-Dade County. This permit modification addresses revisions to Permit PSD-FL-142 (AC13-169901) that allowed conversion from gas to coal burning. The modification is to install a new coal bin, baghouse, and ducting to convert Kiln No. 2 from direct to indirect firing.

Conversion to indirect firing is one of three options available to Tarmac in order to comply with an Agreement with Miami-Dade DERM. The Agreement required payment of approximately \$200,000 as well as achievement of the permit NO_X limits by indirect firing, conversion to dry pyroprocessing, or shutdown of Kiln No. 2.

Tarmac also submitted an application to convert to dry pyroprocessing. DERM is acting on the non-PSD request with the Department's assistance on MACT requirements. Tarmac is pursuing permitting of two options and has not made a final determination on which one will be implemented.

We recommend your approval and signature.

AAL/th

Attachments