

() October 21, 1999

certified mail p 343 639 730
return receipt requested

Permittee:

Tarmac America, Inc.
455 Fairway Drive
Deerfield Beach, Fl 33441

Permit No.	0250020-008-AC	(32)
Issue Date	October 21, 1999	(32)
Expiration Date:	October 20, 2002	(32)
		(32)
<i>Authorized Representative:</i>		(32)
Scott Quaas		(32)
Environmental Manager		

Project and Location:

Project: The construction of a dry process portland cement plant with preheater/calcliner/kiln, cooler, coal mill and raw mill to replace existing kilns and coolers system. A new finish mill will be constructed in addition to the existing mills.

Facility Description: Portland Cement Plant (SIC # 3241)

Location: 11000 N.W. 121 Way, Miami-Dade County, Florida 33178

Lat./Long.: 25 52' 30" N / 80 22' 30" W

UTM: Zone 17; 562.8 Km. E; 2861.7 Km. N

Dear Mr. Quaas:

This is Permit Number 0250020-008-AC to construct an air pollution source issued by the **Miami-Dade County Department of Environmental Resources Management (DERM)** pursuant to **Chapter 24, Code of Miami-Dade County and Chapter 403.087, Florida Statutes (F.S.)**. This is a new construction permit to authorize construction of the emissions units described in this permit.

The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the DERM as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the DERM the authority to issue or deny permits for this type of air pollution source located in

INTEROFFICE MEMORANDUM

Date: 08-Aug-2000 04:36pm
From: Echanique, Frank
DERM) (EchanF@co.miami-

dade.fl.us

Dept:
Tel No:

To: 'alvaro.linero@dep.state.fl.us' (alvaro.linero@dep.state.fl.us)

Subject: FW: Tarmac Construction Permit 0250014-008-AC 10/21/99`

> -----Original Message-----
> From: Kunath, Eva (DERM)
> Sent: Wednesday, August 02, 2000 11:51 AM
> To: Gordon, Ray (DERM)
> Cc: Echanique, Frank (DERM)
> Subject: Tarmac Construction Permit 0250014-008-AC 10/21/99
>
> As per Mr. Al Linero, I am providing you with a copy of Tarmac
> Construction permit issued on 10/21/00.
> Thanks
> Eva Kunath
> <<permitrevoct21.doc>>

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NOTICE OF RIGHTS:

Any party to this Order (permit) 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 Miami-Dade County Department of Environmental Resources Management, Air Facilities Section, at 33 SW 2nd Avenue, Suite 900, Miami, Florida 33130-1540 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 days from the date this Order is filed with the Clerk of the DERM.

STATEMENT OF BASIS:

This permit is issued under the provisions of **Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rules 62-4, and 62-204 through 62-297**, and in conformance with all existing regulations of the FDEP and the DERM rules. The above named owner or operator is hereby authorized to perform the work or construct the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the DERM and made a part hereof and specifically described in this permit.

Attached appendices and Tables made a part of this permit:

Table 1-1	Allowable Opacity Limits	(32)
Table 1-2	Air Pollutants Standards and Terms	
Table 2-1	Compliance Requirements	(32)
Appendix A	General Conditions	(32)
Appendix B	National Emission Standards for Hazardous Pollutants for the Portland Cement Plant	(32)

SECTION I. FACILITY INFORMATION

Subsection A. Facility Description

The currently permitted Tarmac facility consists of: cement distribution rail truck loadouts and packhouse with two baggers, coal handling system, twelve cement storage silos serving mills 1 through 4, slag dryer, insuflation system, cement plant, ready mix plant, three kilns, three coolers, four finish mills with airslides, conveyors and dust collectors, clinker handling and storage system. This permit is for the construction of a dry process portland cement plant with preheater/calcliner/kiln, cooler, coal mill and raw mill to replace existing kilns and coolers system, capable of producing up to 160 tons per hour, and approximately 1,240,000 tons per year (TPY) of clinker. A new finish mill will be constructed in addition to the existing mills.

Emission Units

This permit addresses the following emission units:

Emissions Unit No.	System	Emissions Units Description
ARMS No. 003	Coal Handling	Coal Mill, Pet Coke Feed Bin, Coal Feed Bin Coal Handling and Storage (Fugitive)
ARMS No. 021	Raw Mill/Pyroprocessing Unit	Pyroprocessing consist of the Preheater/Calcliner, Kiln, and Raw Mill
ARMS No. 010, 011, 012, 13 and 022	Finish Mill #1 - #5	Finish Mill # 1- #5 and associated conveyors, separator coolers.
ARMS No. 008 & 009	Clinker Handling and Storage	Clinker Silos 1,2,4,5,11,12, 18-28 and Slag Dryer
ARMS No. 014, 015 and 016	Cement Storage, Packhouse & Loadout	Cement Silos 1-12, Bulk Loadout Unit #1,#2 and #3 Packhouse

Subsection B. Regulatory Classification

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The Tarmac America Pensuco Cement Plant directly emits more than 100 tons per year (TPY) of several regulated air pollutants and emits over 10 TPY of at least one hazardous air pollutant. Therefore it is classified as a "Major Source of Air Pollution or Title V Source," per the definitions in **Rule 62-204.200, F.A.C.**

This industry is listed in Table 62-212.400-1 of Chapter 62-212, F.A.C., "Major Facility Categories." Therefore, stack and fugitive emissions of over 100 TPY of carbon monoxide, volatile organic compounds, sulfur dioxide, nitrogen oxides, or particulate matter characterize the installation as a major facility per the definitions in **Rule 62-210.200, F.A.C.**

The facility is also subject to 40 CFR Subpart F, New Source Performance Standards (NSPS) for Portland Cement Plants, incorporated by reference in **Rule 62-204.800, F.A.C.** and 40 CFR 63, Subpart LLL, Portland Cement Manufacturing Plant

SIGNIFICANT DATES:

Public Notice of Intent Published: April 14, 1999
Additional Information Received: December 1, 1998
Application Received: June 30, 1998

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SECTION II. FACILITY-WIDE CONDITIONS

Subsection A. Administrative

A.1 Regulating Agencies: All documents related to applications for permits to operate, reports, tests, minor modifications and notifications shall be submitted to the Air Division of the Dade County Department of Environmental Resources Management (DERM), Suite 900, 33 Southwest Second Avenue, Miami, Florida 33130-1540.

A.2 Specific and General Conditions: The owner or operator shall be subject to the specific and general conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to **Chapter 403, F.S. [F.A.C. Rule 62-4.160]**

A.3 Terminology: The terms used in this permit have specific meanings as defined in the corresponding chapters of the Florida Administrative Code.

A.4 Forms and Application Procedures: The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C. and follow the application procedures in Chapter 62-4, F.A.C. **[Rule 62-210.900, F.A.C.]**

A.5 Expiration: This air construction permit shall expire on October 20, 2002 **[Rule 62-210.300(1), F.A.C.]**. The permittee may, for good cause, request that this construction permit be extended. Such a request shall be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section, prior to 60 days before the expiration of the permit. However, the permittee shall promptly notify the DERM of any delays in completion of the project which would affect the startup day by more than 90 days. **[Rule 62-4.090, F.A.C]**

A.6 Other Permits: This air pollution permit does not preclude the owner or operator from

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obtaining any other types of required permits, licenses or certifications from the DERM or other departments or agencies.

A.7 Title V Permit is Required: This permit authorizes construction and/or installation of the permitted emission units and initial operation to determine compliance with the FDEP and the DERM rules. An application for a Title V operation permit must be submitted to the Miami-Dade County Department of Environmental Resources Management, Air Facilities Section, **90 days before the expiration date of this permit, but no later than 180 days after commencing operation.** To apply for a Title V operation permit, the applicant shall submit the appropriate application form, and such additional information as the DERM may by law require. [F.A.C. Rule 62-4.030, 62-4.050, and 62-213.420(1)(a)2.]

A.8 Applicable Regulations: Unless otherwise indicated, the construction of a dry process Portland Cement Plant and associated equipment shall be in accordance with the capacities and specifications stated in the application. This facility is subject to all applicable provisions of Chapter 403, F.S and Florida Administrative Code Chapters 62-4; 62-103; 62-204, 62-210, 62-212, 62-213, 62-296, 62-297; and the Code of Federal Regulations Section 40, Part 60. Specifically, this facility is subject to the New Source Performance Standards (NSPS) for Portland Cement Manufacturing Plant identified by the Code of Federal Regulations Section 40 Part 60, Subpart F and National Emission Standards for Hazardous Air Pollutants for Portland Cement Plant, 40 CFR 63, Subpart LLL Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations. [Rule 62-210.300, F.A.C.]

A.9 Chapter 24-Code of Metropolitan Dade County. This facility is subject to all applicable requirements of this Chapter.

Subsection B. Emission Limiting Standards

B.1 General Visible Emissions Standard: [Rule 62-296.320 (4)(b)1 & 4, F.A.C.] Unless otherwise specified by rule or permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere any air pollutants from new or existing emissions units, the opacity of which is equal to:

- (1) Visible emissions from PM sources shall not exceed 20% opacity.

B2 Unconfined Emissions of Particulate Matter [Rule 62-296.320(4)(c)2, F.A.C.]

- (1) The owner or operators shall not cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emission.

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- (1) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
- (1) Reasonable precautions may include the following:
 1. Paving and maintenance of roads, parking areas and yards.
 2. Application of water or chemicals to control emissions from such as demolition of buildings, grading roads, construction, and land clearing.
 3. Application of asphalt, water, oil, chemicals or other dust suppressants on unpaved roads, yards, open stock piles and similar activities.
 4. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 5. Landscaping or planting of vegetation.
 6. Use of hoods, fans, filters, and similar equipment to contain, capture and remove particulate matter.
 7. Confining abrasive blasting where possible.
- (1) Enclosure or covering of conveyor systems.

In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

NOTE: Facilities that cause frequent, valid complaints may be required by the DERM, Air Facilities Section to take these or other reasonable precautions. In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

B.3 General Pollutant Emission Limiting Standards:

- (1) No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emissions control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320 (1)(a), F.A.C.]
 - (b) No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.

NOTE: An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320 (2), F.A.C.]

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Subsection C. Operation and Maintenance

C.1 Changes/Modifications: The owner or operator shall submit to the DERM, Air Facilities Section, for review and obtain approval for any changes in, or modifications to: the method of operation; process or pollution control equipment; increase in hours of operation; equipment capacities; or any change which would result in an increase in potential/actual emissions. Depending on the size and scope of the modification, it may be necessary to submit an application for, and obtain an air construction permit prior to making the desired change. [Rule 62-4.030, 62-210.300 and 62-4.070(3), F.A.C.]

C.2 Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall notify the DERM, Air Facilities Section as soon as possible, but at least within (1) working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; the steps being taken to correct the problem and prevent future recurrence; and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit and the regulations. [Rule 62-4.130, F.A.C.]

C.3 Circumvention: The owner or operator shall not circumvent any air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rules 62-210.650, F.A.C.]

C.4 Excess Emissions Requirements [Rule 62-210.700, F.A.C.]

(a) Excess emissions resulting from start-up, shutdown or malfunction of these emissions units shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized, but in no case exceed two hours in any 24 hour period unless specifically authorized by the DERM, Air Facilities Section for longer duration. [Rule 62-210.700(1), F.A.C.]

(b) Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during start-up, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

(1) In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Air Facilities Section of the DERM within one (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the problem; and the corrective actions being taken to prevent recurrence. [Rule 62-210.700(6), F.A.C.]

Subsection D. Monitoring of Operations

D.1 Determination of Process Variables:

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(a) The permittee shall install, operate, and maintain equipment and/or instruments necessary to determine process variables, such as process weight input or heat input, when such data is needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards. **[Rule 62-297.310 (5), F.A.C.]**

(b) Equipment and/or instruments used to directly or indirectly determine such process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. **[Rule 62-297.310(5), F.A.C.]**

Subsection E. Test Requirements

E.1 Test Performance Within 60 days after achieving the maximum production rate at which this facility will be operated, but not later than 180 days after initial startup up and annually thereafter, (except for VOC), the owner or operator shall simultaneously conduct performance test(s) for PM/PM₁₀, NO_x, SO₂, CO, VE and VOC (initial) pursuant to 40 CFR 60.8, Performance Tests, Rule 62-296.310 F.A.C., 40 CFR 60, Appendix A and 40 CFR 51, Appendix M. No other test method shall be used unless approval from the Department has been received in writing. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emission unit(s) operating at permitted capacity pursuant to Rule 62-297.310(2). F.A.C. **[Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C.]**

E.2 Test Procedures and Test Reports shall meet all applicable requirements of the Florida Administrative Code Chapter 62-297. **[Rule 62-297.310 (4), F.A.C.]**

E.3 Test Notification: The owner or operator shall notify the DERM, Air Facilities Section in writing at least (30) days (initial) and (15) days (annual) prior to conducting each scheduled compliance test. The notification shall include the test date, the expected test time, the facility contact person for the test, and the person or company conducting the test. **[Rule 62-297.310 and 40 CFR 60.8, F.A.C.]**

E.4 Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rule 62-204 through 62-297, F.A.C. or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions units and to provide a report on the results of said tests to the DERM., Air Facilities Section. **[Rule 62-297.310(7)(b), F.A.C.]**

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E.5 Stack Testing Facilities: The owner or operator shall install stack testing facilities in accordance with **Rule 62-297.310(6), F.A.C.**

E.6 Exceptions and Approval of Alternate Procedures and Requirements: An Alternate Sampling Procedure (ASP) may be requested from the Bureau of Monitoring and Mobile Sources of the Florida Department of Environmental Protection in accordance with the procedures specified in **Rule 62-297.620, F.A.C.**

Subsection F. Reports and Records

F.1 Duration: All reports and records required by this permit shall be kept for at least (5) years from the date the information was recorded. [**62-4.160(14)(b), F.A.C.**]

F.2 Emission Compliance Stack Test Reports:

(a) A *test report* indicating the results of the required compliance tests shall be filed with the DERM, Air Facilities Section as soon as practical, but no later than 45 days after the last sampling run is completed. [**Rule 62-297.310, F.A.C.**]

- (1) The *test report* shall provide sufficient detail on the tested emission unit and the procedures used to allow the Department to determine if the test was properly conducted and if the test results were properly computed. At a minimum, the test report shall provide the applicable information listed in **Rule 62-297.310 (8), F.A.C.**

F.3 Excess Emissions Report: If excess emissions occur, the owner or operator shall notify the Air Facilities Section of the DERM, within (1) working day of: the nature, extent, and duration of the excess emissions; the cause of the excess emissions; and the actions taken to correct the problem. In addition, the Department may request a written summary report of the incident. Pursuant to the New Source Performance Standards, excess emissions shall also be reported in accordance with 40 CFR 60.7. [**Rules 62-4.130 and 62-210.700(6), F.A.C.**]

F.4 Annual Operating Report for Air Pollutant Emitting Facility: Before March 1st of each year, the owner or operator shall submit to the Department this required report [DEP Form No. 62-210.900(5)], which summarizes operations for the previous calendar year. [**Rule 62-210.370(3), F.A.C.**]

F.5 This facility shall maintain a central file containing all measurements, records, and other data that are required to be collected pursuant to the various specific conditions of this permit. Operators shall keep a daily Operation and Maintenance (O&M) log to include, at a minimum, the following information:

- (1) Calibration logs for all emission measuring instruments.
- (2) Maintenance/repair logs for any work performed on equipment or emission measuring instrument which is subject to this permit.

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- (1) All measurements, records, and any other data required to be maintained by Tarmac shall be retained for at least five (5) years following the data on which such measurements, records, or data are recorded. These data shall be made available to the DERM or the FDEP staff upon request.

Subsection G. Other Requirements

G.1 Used Oil and Grease: Used oil and grease burned at this facility shall not be a hazardous waste as defined by 40 CFR Part 261.3 or Rule 62-730.030, F.A.C. It shall not include fuels or blended fuels consisting in whole or in part of hazardous waste or which include mixture of any solid waste generated from the treatment, storage, or disposal of hazardous waste. These fuels shall be burned in compliance with Section 403.769(3), Florida Statutes.

G.2 Other Regulations: The owner or operator shall comply with applicable provisions of Rule 62-710, Used oil Management and 40 CFR Parts 279, Standards for the Management of Used Oil.

G.3 **No Hazardous wastes or hazardous materials shall be stored, collected, handled or burned in the new pyroprocessing system.**

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SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. Common Conditions: 40 CFR 60 New Source performance standards

Emission Units

This section addresses the following emission units.

Emissions Unit No.	System	Emissions Units Description
ARMS No. 003	Coal Handling	Coal Mill, Pet Coke Feed Bin, Coal Feed Bin
ARMS No. 021	Raw Mill/Pyroprocessing Unit	Pyroprocessing consist of the Preheater/Calcliner, Kiln, and Raw Mill
ARMS No. 010, 011, 012, 013 and 022	Finish Mill #1 - #5	Finish Mill # 1- #5 and associated conveyors, separator coolers.
ARMS No. 008 & 009	Clinker Handling and Storage	Clinker Silos 1,2,4,5,11,12, 18-28 and Slag Dryer
ARMS No. 014, 015 and 016	Cement Storage, Packhouse & Loadout	Cement Silos 1-12, Bulk Loadout Unit #1,#2 and Packhouse

These emission units shall comply with all applicable requirements of 40 CFR 60, General Provisions, Subpart A, adopted by reference in Rule 62-204.800(7), F.A.C..

- A.1 [40 CFR 60.7, Notification and record keeping]
- A.2 [40 CFR 60.8, Performance tests]
- A.3 [40 CFR 60.11, Compliance with standards and maintenance requirements]
- A.4 [40 CFR 60.12, Circumvention]
- A.5 [40 CFR 60.13, Monitoring requirements]
- A.6 [40 CFR 60.19, General notification and reporting requirements]

This cement plant shall comply with all applicable provisions of the 40 CFR 60 Subpart F, Standards of Performance for Portland Cement Plants, 40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants and 40 CFR 63, Subpart LLL, Portland Cement Manufacturing Plant.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

Subsection B. Specific Conditions:

The following Specific Conditions apply to the following emission units:

Emission Unit No.	System	Emission Unit Description	(32)
ARMS No. 003	Coal Handling	Coal Mill, Pet Coke Feed Bin, Coal Feed Bin Coal Handling System and Storage	(32)

The existing rail delivery system for coal, consisting of a rail dump operation, temporary and active coal storage piles, and coal hopper, will be used for the new plant. Petroleum coke will be utilized as fuel, and will be handled in the same manner as coal. The proposed coal mill system will consist of a Fuller coal mill, which will grind up to 23 TPH of coal, a conveyor, two feed bins, and two storage bins, one for the kiln fuel and one for the calciner fuel. The raw lump coal/petcoke is fed to the coal mill where the coal/petcoke is ground and dried by hot preheater gas. The exhaust gases from the mill exit to a baghouse dust collector. The entrained coal/petcoke dust is removed in the dust collector and the cleaned gas is vented to the atmosphere via the plant common stack. The coal/petcoke is then transferred to storage bins. From the storage bins, the fuel is pneumatically conveyed to the kiln and calciner burners.

This emission unit shall comply with all applicable provisions of the 40 CFR 60 Subpart Y New Source Performance Standards for Portland Cement Plants, Subpart F. [Rule 62-204.800(7)(b)8., F.A.C]

EMISSION LIMITATIONS

B.1 The maximum allowable emission rates for the coal handling system shall not exceed the limits listed in Table 1-1, Air Pollutant Standards and Terms (attached). [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

B.2 In order to minimize excess emissions during startup/shutdown/malfunction this emission units shall adhere to best operational practices. [Rule 62-210.700, F.A.C. and 40 CFR 60.7]

OPERATIONAL LIMITATIONS

B.3 This emission unit is allowed to operate continuously (8760 hours/year) [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

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B.4 The coal handling maximum production rate reflects coal/petroleum coke throughput and shall not exceed 176,080 TPY. [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

B.5 The coal handling maximum hourly rate reflects coal/petroleum coke shall not exceed 23 TPH average rate. [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

TEST METHODS AND COMPLIANCE PROCEDURES

B.6 Particulate and fugitive emissions from coal handling facilities shall be minimized by following the procedures listed below: [Rule 62-296.320(4)(c), F.A.C.]

- (1) All conveyers and transfer points shall be enclosed or covered to preclude particulate emissions (except those directly associated with coal stacking/reclaiming).
 - (2) Coal storage piles shall be shaped, compacted and oriented to minimize wind erosion.
- (1) Water sprays or chemical wetting agents and stabilizers shall be applied to storage piles, handling equipment, etc., during dry periods as necessary to all facilities to maintain an opacity of less than 20 percent at the property line for fugitive emission sources.

Subsection C. Specific Conditions:

The following Specific Conditions apply to the following emission units:

Emission Unit No.	System	Emission Unit Description	(32)
ARMS No. 021	Raw Mill/Pyroprocessing Unit	Pyroprocessing consist of the Preheater/Calcliner, Cooler and Raw Mill.	(32)

The proposed raw material mill system consist of a vertical roller mill capable of grinding up to 315.6 TPH of raw feed (limestone and fly ash). The raw mill will use hot preheater and cooler gases to dry the material from a feed moisture of 12% to a moisture of less than 1%. An auxiliary air heater is provided at the raw mill to provide additional heat for drying. The maximum heat input to the heater is 88 MMBtu/hr. The raw mill is vented to cyclones and then to the main plant dust collector (baghouse) to remove entrained product. The product from the cyclones and dust collector is combined and conveyed to the storage and blending silo., while the cleaned gas is vented to the atmosphere through the plant common stack.

The proposed pyroprocessing system will be capable of producing up to 160 TPH, and 1,240,000 TPY of clinker. The raw feed is introduced to the five-stage preheater/calcliner from the raw mill. The feed is preheated in the first four stages using hot gases from the calcliner/kiln. The

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fifth stage is the calciner, where the fuel is burned to achieve approximately 90% of the total material calcination. The maximum heat input to calciner is 252 MMBtu/Hr. The calcinated feed then enters the kiln, where the remaining calcination takes place. Maximum heat input to the kiln is 228 MMBtu/hr. The calciner exit gas is recycled to the raw and coal mills. The rotary kiln delivers hot clinker at approximately 1450 degrees Celsius to the cooler.

The proposed cooler utilizes fans to force ambient air through the hot clinker bed to cool the hot clinker to 65 degrees Celsius above the ambient temperature. Combustion air required in the kiln and calciner is obtained from the cooler exhaust gases, while the rest of the gas is passed through cyclones to remove entrained clinker dust before recycle of the gases to the raw mill.

Control equipment for the raw mill/preheater/calciner/kiln/cooler:

The particulate emissions will be controlled by a reverse-jet fabric filter or approved equivalent. The design gas volume is 359,000 acfm at 181 °F while the raw mill is operating and 446,200 acfm at 500 °F while raw mill is down. The filter area has not been determined, and at design gas volume, the air-to-cloth ratio will be approximately 2.0 acfm/ft².

This emission unit shall comply with all applicable provisions of the 40 CFR 63 New Source Performance Standards for Portland Cement Plants, Subpart LLL.

SECTION III. EMISSION UNIT(S) SPECIFIC CONDITIONS

EMISSION LIMITATIONS

C.1 The maximum allowable emission rates for the kiln, clinker cooler, raw mill, and preheater/precalciner shall not exceed the limits listed in Table 1-2, Air Pollutant Standards and Terms (attached). [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

C.2 In order to minimize excess emissions during startup/shutdown/malfunction this emission units shall adhere to best operational practices. [Rule 62-210.700, F.A.C. and 40 CFR 60.7]

C.3 The emission standard for sulfur dioxide is 0.8 lb/MMBtu for liquid fuel and 1.2 lb/MMBtu for solid fuel based on a 24 hour average. [Miami-Dade County, Chapter 24-17(2)(b)(i)]

OPERATIONAL LIMITATIONS

C.4 This emission unit is allowed to operate continuously (8760 hours/year) [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

C.5 The kiln clinker production rate shall not exceed 160 tons per hour (TPH). [Rule 62-210.200, F.A.C. (Definitions - Potential Emissions)]

C.6 Fuel Combustion

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(1) Fuels fired in the pyroprocessing system (kiln and precalciner) shall not exceed a total heat input rate of 568 MMBtu/hr and shall consist of: bituminous coal, natural gas, petroleum coke, No. 2 fuel oil, on-specification and off-specification used oil.

Use of fuels other than those listed above is prohibited.

COAL AND PETROLEUM COKE

(2) The coal usage rate shall not exceed 23 TPH based on a 24-hour average. The petroleum coke usage rate shall not exceed 20 TPH on a 24 hour basis.

USED OIL

(3) The constituents and properties of the *on-spec used oil* shall comply with the following allowable concentration levels, as stipulated and defined in 40 CFR 279.10 (July 1, 1996 version), which is adopted by reference in **Rule 62-730.181, F.A.C.**

Constituent/Property	Allowable Concentration	(32)
Cadmium	2 ppm maximum	(32)
Arsenic	5 ppm maximum	(32)
Chromium	10 ppm maximum	(32)
Lead	100 ppm maximum	(32)
Total Halogens	1000 ppm maximum	(32)
Flash Point	140 ° F minimum	(32)
Polychlorinated Byphenyls (PCBs)	Less than 2 ppm	(32)

(4) *On-specification used oil* burned at this facility shall not be a hazardous waste as defined by Rule 62-730.030, F.A.C., or 40 CFR Part 261 (July 1, 1996 version). It shall not include fuels or blended fuels consisting in whole or in part of hazardous waste or which include mixture of any solid waste generated from the treatment, storage, or disposal of hazardous waste. The on-spec used oil shall be burned in compliance with Section 403.769(3), F.S.

(5) *Off-specification used oil* burned at this facility shall not be a hazardous waste as defined by Rule 62-730.030, F.A.C., or 40 CFR Part 261 (July 1, 1996 version). It shall not include fuels or blended fuels consisting in whole or in part of hazardous waste or which include mixture of any solid waste generated from the treatment, storage, or disposal of hazardous waste. The off-spec used oil shall be burned in compliance with Section 403.769(3), F.S.

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(6) Any on and off-specification used oil samples as required by Specific Condition No. C.6(3),(4) and (5) and C.23 shall be analyzed by EPA Recommended Analytical Procedures for Used Oil for the following constituent/property, associated unit, and using the test methods indicated:

Constituent/Property	Units	Test Methods	(32)
Cadmium	ppm	EPA SW-846(6010)	(32)
Arsenic	ppm	EPA SW-846(6010)	(32)
Chromium	ppm	EPA SW-846(6010)	(32)
Lead	ppm	EPA SW-846(6010)	(32)
Total Halogens	ppm	EPA SW-846(9252)	(32)
Sulfur	percent	ASTM D129 or ASTM D1552	(32)
Flash Point	degree F	EPA SW-846(1010)	(32)
Heat of Combustion	Btu/gal	ASTM D240	(32)
Density	lbs/gal		(32)
Polychlorinated Byphenyls (PCB's)	ppm	EPA SW-846(0010) and EPA 680	(32)
Ash			(32)

NOTE: Other test methods may be used only after receiving written prior approval from the Department.

C.7 Any other operating parameters (including control equipment operating parameters) established during compliance testing and/or inspection that will confirm the proper operation of each emission unit shall be included in the operating permit [Rule 62-297.310, F.A.C. and 62-4.070(3), F.A.C.]

MONITORING OF OPERATIONS

C.8 The owner or operator shall record the daily production and the preheater-kiln system feed rate. The permittee may establish a relationship between material feed rates and production rates of clinker if material feed rates are measured more accurately than clinker production rates and the relationship is accurate within 10%. [Rule 62-204.800(7)(b)9., F.A.C., 40 CFR 60.63(a)]

C.9 As required by 40 CFR 60.63(b), the owner or operator shall install, calibrate, maintain, and operate in accordance with 40 CFR 60.13 a *continuous opacity monitoring system* to measure the opacity of emissions from the cement kiln and clinker cooler control device stack. [Rule 62-204.800(7)(b)9., F.A.C.]

CONTINUOUS EMISSIONS MONITORING SYSTEM (CEMS)

C.10 Continuous process monitors shall be installed for CO or O₂ to insure proper combustion practices and for use in determining plant operating parameters to optimize emissions of CO, NO_x, and SO₂. [Rule 62-4.070(3) F.A.C.]

C.11 A continuous emissions monitoring system (CEMS) shall be installed, calibrated,

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maintained, operated, and used to determine compliance with the emissions limits for NO_x and SO₂ in Table 1-2. CEMS shall be installed and certified, before the initial performance test, and operated in compliance with 40 CFR 60, Appendix F, Quality Assurance Procedures (1996 version) or other Department-approved QA plan; 40 CFR 60, Appendix B, Performance Specification 1, 2, and 3 (1996 version). [Rules 62-4.070 (3) and 62-204.800, F.A.C.]

C.12 The CEMS shall calculate and record emission rates in units of pounds of NO_x and SO₂ per hour.

Every day, the 24-hour average NO_x and SO₂ emission rate for the previous day shall be calculated. Emissions shall be calculated in units of pounds per hour and pounds per ton of clinker. Daily averages are to be calculated as the arithmetic mean of each monitored operating hour. A monitored operating hour is each hour in which fuel is fired in the unit and at least two emission measurements are recorded at least 15 minutes apart. Data taken during periods of startup, or when fuel is not fired to the unit, or when the CEMS is not calibrated shall be excluded from the daily average.

To the extent the monitoring system is available to record emissions data, the CEMS shall be operated and shall record data at all operating hours when fuel is fired in the unit, including periods of startup, shutdown, load change, continuous operation and malfunction.

Opacity monitor downtimes and excess opacity emissions, which include startup emissions, shall be reported on a quarterly basis using the SUMMARY REPORT in 40 CFR 60.7. A detailed report of the cause, duration, magnitude, and corrective action taken or preventative measures adopted for each excess emission occurrence, and a listing of monitor downtime occurrences shall accompany the SUMMARY REPORT when the total duration of excess emissions is 1% or greater or if the monitoring system downtime is 5% or greater of the total monitored operating hours.

C.13 The monitoring device shall meet the applicable requirements of Chapter 62-204, F.A.C., 40 CFR 60, Appendix F, and 40 CFR 60.13, including certification of each device in accordance with 40 CFR 60, Appendix B, Performance Specifications and 40 CFR 60.7(a)(5) Notification Requirements. Data on monitoring equipment specifications, manufacturer, type calibration and maintenance requirements, and the proposed location of each monitor shall be provided to *DERM* for review at least 45 days prior to replacement of a any CEMS. [Rule 62-4.070 (3) F.A.C and Rule 62-204.800, F.A.C.]

TEST METHODS AND PROCEDURES

C.14 For emissions other than NO_x and SO₂, compliance with the allowable emission limiting standards listed in Table 1-2 shall be determined by using the following reference methods as described in 40 CFR 60, Appendix A (1996, version) and 40 CFR 61 Appendix B 1996, version) adopted by reference in Chapter 62-204, F.A.C.

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Method 5	Determination of Particulate Matter Emissions from Stationary Sources.
Method 7 or 7 e	Determination of Nitrogen Oxide Emissions from Stationary Sources
Method 8	Determination of Sulfuric Acid Mist from Stationary Sources.
Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources.
Method 10	Determination of Carbon Monoxide Emissions from Stationary Sources.
Method 23 Polychlorinated	Determination of Polychlorinated Dibenzo-p-Dioxins and Dibenzofurans from Stationary Sources
Method 25 or 25A	Determination of Volatile Organic Compound Emissions from Stationary Sources.
Method 29	Determination of Lead, Beryllium, and Mercury from Stationary Sources.

Note: PM10 will be tested pursuant to 40 CFR 51, Appendix M

Emission testing shall be performed at the kiln/cooler main stack during a period when the kiln precalciner, cooler, raw mill and preheater are operating simultaneously and under normal operating conditions. EPA-reference methods for sampling pollutants shall be as specified in 40 CFR 60, Appendix A.

These emission units shall comply with all applicable requirements of Rule 62-297.310, F.A.C. General Test Requirements and 40 CFR 60.8. Performance Tests. Table 2-1, Compliance Requirements (attached) also lists the EPA methods.

Testing of emissions shall be conducted with the emission unit operating at capacity. The permittee shall provide the DERM with a *protocol* that will outline the different fuel scenarios (% of total heat input) that this unit will be burning. Tarmac shall obtain the test data necessary to determine whether this kiln is capable of accommodating the burning of coal or petroleum coke and all of the other supplemental fuels specified on Specific Condition C.6. Fuel Combustion. The fuel scenarios tested shall represent the actual combustion percentage (% of total heat input) that is going to be maintained while burning supplemental fuels during normal operation. The frequency of testing shall be determined by the DERM.

Annual test are required for NO_x and SO₂.

Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the unit may be tested at less than 90% of the maximum operating rate allowed by the permit; in this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rules 62-204.800, 62-297.310, 62-297.400, 62-297.401, F.A.C., and 40 CFR 60 Appendix A and 40 CFR 60.8, Subpart A].

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C.15 The visible emissions test shall be conducted by a certified observer and should be 180 minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur [40 CFR 60.11 and Rule 62-297.310 (7), F.A.C.].

C.16 Compliance with the particulate matter standard contained in Table 1-2 (attached) shall be determined using EPA Method 5. The emission rate (E) of particulate matter shall be computed for each run using the following equation: [FR volume 64 # 113 63.1349, NESHAP Portland Cement Plant, Subpart LLL)

$$E = (c_s \times Q_{sd}) / (P)$$

where:

- E = emission rate of particulate matter, kg/Mg of kiln feed.
c_s = concentration of particulate matter, kg/dscm.
Q_{sd} = volumetric flow rate of effluent gas, dscm/hr.
P = total kiln feed (dry basis) rate, Mg/hr.

C.17 The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30.0 dscf) for the kiln and at least 60 minutes and 1.15 dscm (40.6 dscf) for the clinker cooler. [Rules 62-204.800 and 62-297.401, F.A.C. 40 CFR 60.64(b)(1) - (3)].

C.18 Suitable methods shall be used to determine the kiln feed rate (P), for each run. Material balances over the production system shall be used to confirm the feed rate [40 CFR 60.64(3)].

Operating Procedures

C.19 Operating procedures shall include good combustion practices and proper training of all operators and supervisors. The good combustion practices shall meet the guidelines and procedures as established

by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.].

RECORDKEEPING AND REPORTING REQUIREMENTS

C.20 The owner or operator shall submit reports of excess emissions based upon data from the continuous opacity monitoring system. Periods of excess emissions that shall be reported are defined as all 6 minute periods during which the average opacity exceeds that allowed in Table 1-2. The content of these reports must comply with the requirements in 40 CFR 60.7(d). Such reports shall be submitted quarterly pursuant to 40 CFR 60.7 (c). [Rule 62-204.800, F.A.C.; 40 CFR 60.63(d), 60.65(a) and 40 CFR 60.7].

C.21 In order to document compliance with Specific Condition No. C6(2) Coal and Petroleum

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coke, a fuel usage control system shall be established to assure that the coal and petroleum coke usage rates does not exceed 23 TPH and 20 TPH based on a 24-hour average respectively.

C.22 In order to document compliance with Specific Conditions No. C.6(3) through C.6(6) **Used Oils**, the following requirements shall be adhered to as a minimum:

- (1) Recordkeeping when burning used oil shall be in accordance with applicable provisions of 40 CFR Part 279, Subpart B and Subpart G (July 1, 1996 version), Standards For The Management of Used Oil and Chapter 62-710, F.A.C.
- (2) The following shall be recorded on the delivery receipt:
 - (1) the use of tamper proof seals on the delivery receipt
 - (2) the volume of fuel delivery
 - (3) a cross reference to the analysis which establishes that the used oil meets EPA used oil fuel specifications
- (1) the results of the screening analysis
- (2) the name of the person performing the test
- (3) the specific test kit used
- (4) the amount of oil sampled
- (5) the amount and name of the solution used to dilute the oil
- (3) The following procedures shall be implemented:
 - (1) On and off spec used oil that is delivered without a delivery receipt containing all the above information, or which is not properly sealed, or for which the delivery receipt does not contain all the necessary information, is not to be accepted and the DERM is to be notified by phone immediately (with written confirmation to follow), if such a delivery is attempted.
 - (1) Verification by signature on the delivery receipt shall be provided by plant personnel that the delivery truck arrived on site with all seals intact. As delivered samples of all used oil fuel received shall be accumulated through each quarter for each supplier.
 - (1) The results of each sample analysis (on the laboratory's letterhead) shall be submitted to the DERM within 30 days after a sample is taken and analyzed.
 - (1) The dates and quantities of both on and off-spec purchased used oil transferred to the facility storage tank shall be reported quarterly (i.e., Jan-Mar, April-June, July-Sept, and Oct-Dec). The report is due in the month following the ending quarter.
 - (1) The unused portion of the used oil sample shall be retained for six months following the submittal of the analyses in case further testing is required.

C.23 All measurements, records, and other data required to be reported by the permittee shall be submitted to the DERM on a quarterly basis with the start of commercial operation in accordance with 40 CFR 60.7. All measurements, records and other data required to be maintained by the permittee shall be retained for at least 5 years following the date on which such measurements, records, or data are recorded. The data shall be available to the DERM

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or FDEP staff as requested. [40 CFR 60.7]

C.24 The owner or operator shall submit reports of the malfunction information required to be recorded by 40 CFR 60.7(b). These reports shall include the frequency, duration, and cause of any incident resulting in de-energization of any device controlling kiln emissions or in the venting of emissions directly to the atmosphere. [Rule 62-204.800, F.A.C., 40 CFR 60.65 (c)]

C.25 This facility shall maintain a central file containing all measurements, records, and other data that are required to be collected pursuant to the various specific conditions of this permit. Operators shall keep a daily Operation and Maintenance log to include, at a minimum, the following information:

- (1) The data collected from in-stack monitoring instruments
- (2) The records on daily feed rates and clinker production rate
- (3) The amount and type of fuel burned.
- (1) Calibration logs for all instruments
- (2) Maintenance/repair logs for any work performed on equipment or instrument which is subject to this permit;
- (3) The following fuel records shall be maintained for a minimum of five (5) years and made available upon request:
 - (1) Coal
 - (1) The coal usage rate in tons per day;
 - (2) The average sulfur content and heating value (Btu/lb) of each coal shipment based upon analysis of a sample representative of the shipment (trainload).
 - (1) Liquid Fuels
 - (1) The fuel type (number) and usage rate in gal per day;
 - (1) Records of the sulfur content and heating value (Btu/gal) of each oil shipment based upon analysis of a sample representative of the shipment.
 - (1) Natural Gas
 - (1) The fuel usage rate in cubic feet per day;
 - (2) The average heating value (Btu/ft³) provided by the gas supplier.

All measurements, records, and any other data required to be maintained by Tarmac shall be retained for at least five (5) years following the date on which such measurements, records, or data are recorded. These data shall be made available to the FDEP and to the DERM upon request. DERM shall be notified in writing at least 15 days prior to the testing (auditing) of any emission measurement instrument required to be operated by these specific conditions in order to allow witnessing by authorized personnel. [Rule 62-4.070(3), F.A.C.]

SUBSECTION D. SPECIFIC CONDITIONS

The following Specific Conditions apply to the following emission units:

Emissions Unit No.	System	Emissions Units Description
ARMS No. 010, 011, 012, 13 and 022	Finish Mill #1 - #5	Finish Mill # 1- #5 and associated conveyors, separators and coolers.
ARMS No. 008 & 009	Clinker Handling and Storage	Clinker Silos 1,2,4,5,11,12, 18-28 and Slag Dryer
ARMS No. 014, 015 and 016	Cement Storage, Packhouse & Loadout	Cement Silos 1-12, Bulk Loadout Unit #1,#2 and #3 Packhouse

EMISSION LIMITATIONS

D.1 The permittee shall not cause or allow to be discharged into the atmosphere visible emissions or particulate emissions that exceed the limits given in Table 1-1. [Rule 62-210.200., F.A.C. (Definitions - Potential Emissions)]

D.2 In order to minimize excess emissions during startup/shutdown/malfunction these emission units shall adhere to best operational practices. [Rule 62-210.700., F.A.C. and 40 CFR 60.7]

OPERATIONAL LIMITATIONS

D.3 This cement plant and associated equipment is allowed to operate continuously (8760 hours/year) [Rule 62-210.200., F.A.C. (Definitions - Potential Emissions)].

TEST METHODS AND COMPLIANCE PROCEDURES

D.4 The maximum permitted allowable particulate emission rate (lb/hr and gr/dscf) from these emissions units are as stated in Table 1-1. The permittee may demonstrate compliance by adhering to an opacity limit of 5% in lieu of particulate stack tests. [Rule 62-297.620(4), F.A.C.]

In accordance with Rule 62-297.620(4), minor particulate sources equipped with baghouses with

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visible emissions that are greater than or equal to 5 percent opacity may require the permittee to perform a stack test in accordance with approved methods to verify compliance with the lb/hr emission limit contained in Table 1-1.

D.5 Compliance with the allowable emission limiting standards listed in Table 1-1 shall be determined by using the following reference methods as described in 40 CFR 60, Appendix A (1996, version) adopted by reference in Rule 62-204.800(7), F.A.C.

Method 9 Visual Determination of the Opacity of Emissions from Stationary Sources (I) and (A).

Testing of emissions must be accomplished within 90 to 100% of the permitted capacity [Rule 62-297.310(2), F.A.C]. Failure to submit the input rates and actual operating conditions may invalidate the test [Rule 62-297.310(2), F.A.C.].

These emission units shall comply with all applicable requirements of Rule 62-297.310 General Test Requirements and 40 CFR 60.8, Subpart A, Performance Tests.

D.6 The visible emissions test, EPA Method 9, shall be conducted by a certified observer and should be 60 minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.[Rule 62-297.310, F.A.C.]

D.7 Should the DERM have reason to believe the particulate matter standards set forth in Table 1-1 are not being met, the DERM may require that compliance with the particulate emission standards be demonstrated by testing the subject emission unit. [Rule 62-297.620(4) and 62-297.310, F.A.C.]

D.8 Operating procedures shall include good operating practices and proper training of all operators and supervisors. The good operating practices shall meet the guidelines and procedures as established by the equipment manufacturers. All operators (including supervisors) of air pollution control devices shall be properly trained in plant specific equipment. [Rule 62-4.070(3), F.A.C.].

Executed in Miami-Dade County, Florida.

DEPARTMENT OF ENVIRONMENTAL
RESOURCES MANAGEMENT

Mallika Muthiah, P.E. Date
Air Facilities Section
Air Quality Management Division

MM/mk

attachment

Tarmac America, Inc.
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cc: David Buff, P.E., Golder Associates, Inc.
Isadore Goldman, P.E., Florida Department of Environment, West Palm Beach
Bruce Mitchell, Florida Department of Environmental Protection, Tallahassee

FILING AND ACKNOWLEDGMENT: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated DERM Clerk, receipt of which is hereby acknowledged.

Clerk

Date

RFC-822-headers:

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with ESMTP id <01JSQFSNCZYA000MLG@mail.epic1.dep.state.fl.us> for
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