



# Tarmac

TARMAC FLORIDA, INC.

P.O. Box 2998  
Hialeah, Florida 33012

Aug 13 1990  
DER-BAQM

August 9, 1990

Mr. Clair Fancy, P.E., Chief  
Bureau of Air Regulation  
Fla. Dept. of Environmental Regulation  
Twin Towers Office Bldg.  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Proposed Modification - Kiln No. 2 Coal Conversion  
DER File No. AC13-169901

Dear Mr. Fancy:

Please find enclosed a copy of the affidavit of publication for the *Notice of Intent to Issue Permit* for the above referenced project. Should you have any questions please call me at (305)823-8800.

Sincerely,

Scott Quaas  
Environmental Specialist

cc: J. Alves - Hopping Boyd Green & Sams

*J. Reynolds*  
*J. Eldman, SEKist*  
*P. Stong, DER M*  
*M. Brown, EPA*  
*C. Shoups, NPS*



HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

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SAM J. SMITH  
CHERYL G. STUART

OF COUNSEL

W. ROBERT FOKES

June 11, 1990

BY HAND-DELIVERY

Mr. Clair Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Room 306F, Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Tarmac Kiln No. 2 Conversion  
DER File No. AC13-169901

Dear Clair:

On May 22, 1990, representatives of the Department and Tarmac met in your office to discuss outstanding areas of disagreement regarding the Department's proposed BACT determination for the above-referenced project. The Department stated that it would take Tarmac's points under advisement and respond early in June. My impression was that the Department agreed that the NO<sub>x</sub> limitation needed to be adjusted, and that there may be room for movement on the SO<sub>2</sub> limitation, albeit not to the degree that Tarmac requested.

Shortly after our meeting, and after a follow-up telephone conference with David Schwartz, I filed a request for extension of the time to challenge the Department's BACT determination to June 19, 1990 (copy attached). Meanwhile, Al Townsend of Tarmac sent a letter to you (copy attached) substantially backing off of Tarmac's original requested BACT limitations, and seeking a compromise resolution.

The June 19 deadline is quickly approaching, and I still have not seen an official reply from the Department in response to Tarmac's proposed compromise. If at all possible, I would greatly appreciate hearing from the Department on this by no later than June 15.

Mr. Clair Fancy  
Page 2  
June 11, 1990

I sincerely hope that the Department will work with Tarmac to arrive at a mutually acceptable solution to the issue at hand. The folks at Tarmac, certainly, have provided valid technical data and scientific information in support of their position, and, after undertaking some soul searching, have exhibited good faith efforts towards arriving at an amicable resolution. I trust that the Department, too, will strive to reach a principled and reasonable compromise.

Very truly yours,



James S. Alves

/lsd

Enclosures

cc: (w/enclosures)  
Steve Smallwood  
Barry Andrews  
David Schwartz

HOPPING BOYD GREEN & SAMS

ATTORNEYS AND COUNSELORS

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SAM J. SMITH  
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OF COUNSEL  
W. ROBERT FOXES

June 1, 1990

BY HAND DELIVERY

Dale H. Twachtmann, Secretary  
c/o David Schwartz, Esquire  
Office of General Counsel  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road, Room 654  
Tallahassee, Florida 32399-2400

Re: Tarmac  
Kiln No. 2 Coal Conversion  
DER File No. AC13-169901.  
PSD-FL-142

Dear Secretary Twachtmann:

On April 4, 1990, Tarmac received the Department's Notice of Intent to Issue Permit for the above-referenced facility. Tarmac timely requested that the Department extend the period for challenging certain permit conditions. By order dated May 4, 1990, the Department extended the deadline to June 4, 1990.

I am writing on behalf of Tarmac to request an extension of fifteen (15) days, to and including June 19, 1990, in which to file a petition for administrative proceedings regarding the conditions set forth in the Notice of Intent to Issue Permit. This request is made pursuant to Florida Administrative Code Rule 17-103.070, which provides that a timely request for extension of time shall toll the running of the time period in which to file an appropriate petition. As good cause for granting the requested extension of time for filing, Tarmac shows the following:

Dale H. Twachtman, Secretary  
June 1, 1990  
Page 2

1. Tarmac has conferred on several occasions with Department officials in an attempt to resolve the outstanding areas of disagreement.

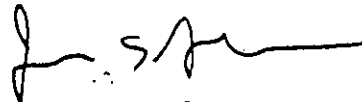
2. The most recent meeting occurred on May 22, 1990. The District officials stated that they would take Tarmac's comments under advisement and respond in early June.

3. This request is filed as a protective measure to avoid waiver of Tarmac's right to challenge conditions contained in the Notice of Intent to Issue Permit. Granting this request will facilitate the possibility of an acceptable resolution of this matter without the mutual inconvenience of administrative proceedings.

4. I hereby certify that I have spoken with David Schwartz, Assistant General Counsel for the Department, and that he informed me he has no objection to this request.

Accordingly, I respectfully request that you extend the time, to and including June 19, 1990, for filing a petition for administrative proceedings in regard to the Department's Notice of Intent to Issue Permit.

Sincerely,



James S. Alves

TarmacExt:gbb



United States Department of the Interior

RECEIVED

JUN 05  
TAKE  
PRIDE IN  
AMERICA  
DER-BAQM

National Park Service  
SOUTHEAST REGIONAL OFFICE

75 Spring Street, S. W.  
Atlanta, Georgia, 30303

IN REPLY REFER TO:

N3615 (475)

MAY 30 1990

Mr. Bill Thomas  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Dear Mr. Thomas:

Thank you for sending us a copy of Tarmac Florida Inc.'s (Tarmac) permit application and your technical review document regarding Tarmac's proposal to modify its cement manufacturing facility in Medley, Dade County, Florida. The Tarmac facility is located approximately 30 km northeast of Everglades National Park (EVER), a class I air quality area administered by the National Park Service. We appreciate your continued cooperation in notifying us of proposed projects that may impact the air quality and related resources of our areas.

Tarmac proposes to convert kiln No. 2 from gas/oil firing to coal firing. The proposed project would result in significant increases in emissions of sulfur dioxide ( $\text{SO}_2$ ), nitrogen oxides ( $\text{NO}_x$ ), sulfuric acid mist ( $\text{H}_2\text{SO}_4$ ), lead (Pb), and beryllium (Be). Consequently, PSD review is required for these five pollutants. Our comments on the best available control technology (BACT), air quality, and air quality related values (AQRVs) analyses with respect to the proposed project's potential impacts on EVER are discussed below. We ask that you consider our comments before you make a final determination on the proposed project.

\* We agree with Tarmac that the existing electrostatic precipitator represents BACT to minimize emissions of Pb and Be. For  $\text{SO}_2$  and  $\text{NO}_x$ , we do not agree that the rates proposed by Tarmac represent BACT. Tarmac has proposed a  $\text{SO}_2$  rate of 400 lb/hr (16 lb/ton of clinker produced). This rate is based on a 36 percent inherent removal efficiency associated with the limestone feed into the kiln and the particulate control device. As you point out in your BACT analysis, past BACT determinations for coal fired kilns have ranged from a low of

20 percent to a high of 90 percent. However, the 20 percent determination was made in 1981 and is not representative of today's "top down" BACT policy.

X  
Tarmac's major argument in support of the proposed 400 lb/hr rate is its willingness to lower the allowable limit if performance test data support a lower level. Such an approach to setting an emission limit does not meet the intent of the BACT analysis. A BACT analysis is a preconstruction review and should be based on the best data available at the time of the review. It should not reflect an arbitrarily high emission limit with the promise to revise the limit downward if future test data so indicate.

Agreement  
Tarmac indicated that testing on kiln No. 3 shows that the inherent SO<sub>2</sub> removal efficiency for this kiln averages 75 percent. Although kiln No. 3 is larger than Kiln No. 2, both kilns are processing the same limestone feed. Therefore, we would expect the inherent SO<sub>2</sub> removal efficiencies of the two kilns to be somewhat similar. Also, for kiln No. 3, the SO<sub>2</sub> absorption efficiency decreased by 24 percent when coal was fired instead of residual oil. When firing residual oil in kiln No. 2, the SO<sub>2</sub> removal efficiency was 91.3 percent. We agree that it is reasonable to assume that the differential efficiency decrease for firing coal instead of oil should be similar for both kilns. Therefore, we agree that a SO<sub>2</sub> removal efficiency of 69.4 percent and a resulting SO<sub>2</sub> limit of 195 lbs/hr represent BACT for the proposed project.

Agreement  
Similarly for NO<sub>x</sub>, Tarmac's proposed rate (4.2 lb/ton feed) is higher than past BACT determinations (1.6 - 2.9 lb/ton). We agree with you that a NO<sub>x</sub> emission rate of 2.84 lb/ton better reflects BACT for the proposed project.

Tarmac used the ISCST dispersion model to predict potential SO<sub>2</sub> and NO<sub>2</sub> impacts at EVER. Surface and upper air meteorological data (1982-1986) from Miami and West Palm Beach, Florida, respectively, were deemed to be representative of the project area and were used as input to the model. Tarmac's air quality analysis shows that the expected SO<sub>2</sub> impacts at EVER would be 18.5, 4.7, and 0.6 ug/m<sup>3</sup> for the 3-hour, 24-hour, and annual averaging times, respectively. This represents a 74, 94, and 30 percent consumption of the allowable SO<sub>2</sub> class I increment for the respective averaging times. The maximum NO<sub>2</sub> class I impact was predicted to be 0.02 ug/m<sup>3</sup> (annual average).

X  
Although the impacts at EVER would be considerably less if the lower emissions proposed by your office were modeled, Tarmac's air quality analysis appears to be incomplete with respect to the emissions inventory used to predict PSD increment consumption. Tarmac indicates in its permit application that the maximum increment consumption values are due to the effects of two increment consuming sources located in Dade County: Tarmac Florida (cement plant) and Dade County Resource Recovery



(MSW incinerator). If the emissions inventory included only these two sources in Dade County, then it may be inadequate because it is possible that other increment consuming sources located outside of Dade County may impact EVER.

An emissions inventory used to assess potential impacts on a class I area should consist of all increment consuming emissions within the impact area of the proposed source and those outside the impact area that are within 50 km and/or between the proposed source and the class I area. We ask that you carefully scrutinize Tarmac's emissions inventory and ensure that all appropriate increment consuming sources are modeled.

~~X~~  
DONE

A cumulative impact analysis should also be made of all permitted and existing sources within 50 km of the facility's impact area, along with any sources between the proposed source and the park, that could potentially impact the class I area (this is especially important for annual impact determinations). This, along with representative ambient air monitoring data, will yield a more accurate assessment of potential total cumulative impacts in EVER.

Tarmac performed a Level-1 visibility screening analysis based on the new visibility screening analysis model-- VISCREEN -- described in the Environmental Protection Agency's Workbook for Plume Visual Impact Screening and Analysis (September 1988). The results of this analysis show that the proposed project passes the Level-1 screening test. Therefore, it is unlikely that the proposed emissions would cause plume impacts in EVER. Nevertheless, the potential of the source to contribute to the regional haze visibility problem in EVER still exists. Regional haze is a problem that impairs visibility in the park and the surrounding region. Visibility in the eastern U.S. has degraded steadily since the early 1950's, with the most dramatic changes occurring in the spring and summer months (Husar et al., 1981). In many areas in the East, sulfates are responsible for much of the haze (e.g., recent studies carried out at Shenandoah National Park have shown that sulfates are responsible for nearly 70 percent of reduced visibility, while organics contribute up to 30 percent of the problem (Malm et al., 1987)).

Within 100 km of an urban center, a powerplant, or other industrial facilities, haze is generally a mixture of gases and secondary aerosols. Gaseous "precursor" emissions from a source are converted through very complex reactions into secondary aerosols. Sulfur oxides convert into sulfuric acid and ammonium sulfate, nitrogen oxides convert to nitric acid and ammonium nitrate, and hydrocarbons become organic aerosols (Malm et al., 1989). In most cases, we do not yet have the data and analytical techniques needed to estimate the contribution of an individual source to regional haze. However, monitoring and modeling studies that are being

conducted presently may provide a means of assessing the contribution of individual sources to regional haze. In the meantime, we encourage the Florida DER to take all steps possible to reach national and State visibility goals by limiting pollutants, such as SO<sub>2</sub>, NO<sub>2</sub>, and VOCs that contribute to visibility degradation not only in class I areas but in the whole region.

In summary, we agree that the SO<sub>2</sub> and NO<sub>x</sub> emission rates proposed in your draft permit reflect BACT. Also, because Tarmac's air quality analysis shows that the allowable class I SO<sub>2</sub> increment (24-hr average) will be virtually consumed, and since there is some question as to the completeness of the emissions inventory used in the analysis, we ask that you carefully scrutinize Tarmac's emissions inventory and ensure that all appropriate increment consuming sources are modeled.

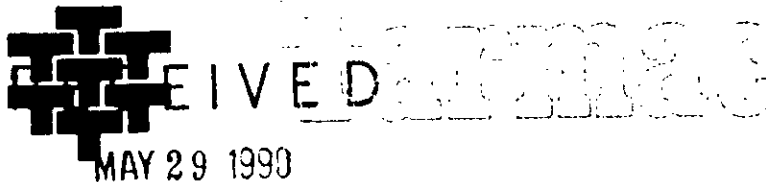
If you have any questions regarding the above comments, please contact John Bunyak of our Air Quality Division in Denver at (303) 969-2071.

Sincerely,

*John Till*

EOR Robert M. Baker  
Regional Director  
Southeast Region

cc: J. Reynolds  
L. Andrews  
T. Zinn  
S. Brooks, SE Dist.  
P. Stang, DERD  
B. Miller, EPA



TARMAC FLORIDA, INC.

DER - BAQM P.O. Box 2998  
Hialeah, Florida 33012

May 23, 1990

Mr. C.H. Fancy, P.E., Chief  
Bureau of Air Regulation  
Florida Department of Environmental  
Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

RE: Proposed Modification - Kiln 2 Coal Conversion  
DER File No. AC13-169901; PSD-FL-142

Dear Mr. Fancy:

I would like to thank you and your staff for taking the time out of your busy schedules to meet with us once again. Today I met with our cement production staff one more time to see if anything further could be done to reduce the SO<sub>2</sub> emission limit requested in the referenced application. After much sole searching and discussions Tarmac feels that an initial permitted SO<sub>2</sub> limit of 321 lb/hr would be feasible. We would propose the same testing program which E.P.A. has accepted and adjust the emissions limits accordingly. This change is based on the following assumptions:

Original Application:

- 1 - The sulfur content of the coal is 2% sulfur with a maximum heat input per ton of clinker of 6.5 MMBTU. This gives potential SO<sub>2</sub> emissions from the fuel of 520 lb/hr.

$$(13000 \text{ lb/hr coal}) \times (2\% \text{ S content}) \times (32/18 \text{ S to SO}_2 \text{ conversion}) = 520 \text{ lb/hr}$$

- 2 - The raw kiln feed has a sulfate content as SO<sub>3</sub> of 0.16%. With a feed rate of 81000 lb/hr on a dry basis this gives potential SO<sub>2</sub> emissions from the feed of 103.7 lb/hr.

$$(81000 \text{ lb/hr feed}) \times (0.16\% \text{ SO}_3 \text{ content}) \times (64/80 \text{ SO}_3 \text{ to SO}_2 \text{ conversion}) = 103.7 \text{ lb/hr}$$

- 3 - The absorption of SO<sub>2</sub> in the kiln is projected to be 36 per cent. Based on this absorption the SO<sub>2</sub> emission rate as stated in the application is 400 lb/hr.

$$(520 \text{ lb/hr from coal}) + (103.7 \text{ lb/hr from feed}) = 623.7 \text{ lb/hr potential}$$
$$(623.7 \text{ lb/hr potential}) - (36\% \text{ absorption}) = 399.2 \text{ lb/hr SO}_2 \text{ emissions}$$

Mr. Clair Fancy, P.E.  
Bureau of Air Regulation  
Fla. Dept. of Environmental Regulation  
May 23, 1990

-Page 2-

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Proposed SO<sub>2</sub> Limit Revision:

- 1 - In our agreement with EPA the sulfur content would be a rolling average of 1.75% with a maximum of 2.0%. This reduces the potential SO<sub>2</sub> emissions from the fuel to 455 lb/hr.

$$(13000 \text{ lb/hr coal}) \times (1.75\% \text{ S content}) \times (32/16 \text{ S to SO}_2 \text{ conversion}) = 455 \text{ lb/hr}$$

- 2 - The cement production staff have come up with a method of reducing our energy requirements (i.e. heat input). This would be accomplished by redesigning the chain system in the kiln to recover more heat and in such a way as to not cause any air flow problems or back drafts in the kiln. They feel that with this redesign that the maximum heat input requirement per ton of clinker could then be reduced to 6.0 MMBTU. This would reduce the coal input by 1000 lb/hr which would reduce the potential SO<sub>2</sub> emissions into the kiln by 35 lb/hr.

$$(1000 \text{ lb/hr coal}) \times (1.75\% \text{ S coal}) \times (32/16 \text{ S to SO}_2 \text{ conversion}) = 35 \text{ lb/hr}$$

- 3 - One final fine tuning of our projected SO<sub>2</sub> emissions is to use an average sulfate content of our raw kiln feed over the last five years instead of the highest sulfate content as used in the original application. The average raw kiln feed sulfate content as SO<sub>3</sub> for the past five years is 0.126% versus 0.16% in the original application. With a feed rate of 81000 lb/hr on a dry basis this gives potential SO<sub>2</sub> emissions from the feed of 81.6 lb/hr.

$$(81000 \text{ lb/hr feed}) \times (0.126\% \text{ SO}_3 \text{ content}) \times (64/80 \text{ SO}_3 \text{ to SO}_2 \text{ conversion}) = 81.6 \text{ lb/hr}$$

- 4 - Applying these factors and utilizing the projected SO<sub>2</sub> absorption in the kiln of 36%, the revised SO<sub>2</sub> emission rate is 321 lb/hr.

$$(455 \text{ lb/hr from coal}) - (35 \text{ lb/hr reduced heat input}) + (81.6 \text{ lb/hr from feed}) = 501.6 \text{ lb/hr} \\ (501.6 \text{ lb/hr potential}) - (36\% \text{ absorption}) = 321.0 \text{ lb/hr SO}_2 \text{ emissions}$$

I am hopeful this revised starting point, or initial 321.0 lb/hr limit for SO<sub>2</sub> emissions along with the 169.3 lb/hr limit for NO<sub>x</sub> will be acceptable in conjunction with Tarmac's proposal to conduct a 1-year testing program. The testing program will allow adequate data to be collected upon which a true BACT limit can then be established.

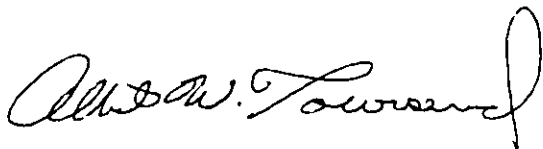
Mr. Clair Fancy, P.E.  
Bureau of Air Regulation  
Fla. Dept. of Environmental Regulation  
May 23, 1990

-Page 3-

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I again thank you and your staff for your time on this matter and entreat your consideration and balanced decision. Should you have any questions or request further information please do not hesitate to call me at (305)823-8800.

Sincerely,



Albert W. Townsend  
Manager, Real Estate & Environmental

cc: D. Buff  
D. Bailey  
S. Quaas  
J. Alves  
J. Reynolds  
E. Mitchell  
M. Finley  
L. Brown, SE Dept.  
H. Sklar, DEE  
C. Miller, EPA  
T. Stone, NPS



April 19, 1990

RECEIVED  
APR 24 1990  
DER. L.

Mr. C.H. Fancy, P.E.  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: Proposed Modification--Kiln No. 2 Coal Conversion  
PSD-FL-142--AC13-169901

Dear Mr. Fancy:

This correspondence is to summarize the outcome of our meeting on April 17, at your offices in Tallahassee, to discuss the above referenced permit application. The discussion centered on FDER's BACT determination, as set forth in the draft permit, and the proposed SO<sub>2</sub>/NO<sub>x</sub> emission limits for Kiln 2. Tarmac's major concerns, as expressed to you in the meeting, are as follows:

1. Dry process cement kilns cannot be compared with wet process cement kilns, such as Tarmac's;
2. NSPS for fossil fuel steam generators are not appropriate for comparison to portland cement plants because of the very different nature of the cement manufacturing process;
3. FDER must properly consider site-specific factors in their BACT determination- wet process plant, kiln size and capacity, raw feed sulfur content, coal sulfur content, existing precipitator for particulate control, and proper interpretation of historic test data from the kilns at the plant;
4. Past BACT determinations and test data from other wet process kilns (which is very limited) cannot be directly applied to Tarmac Kiln 2, because of the site-specific nature of SO<sub>2</sub>/NO<sub>x</sub> emissions from cement kilns;
5. EPA Region IV has approved in writing Tarmac's plan for a 1-year testing period to determine an acceptable BACT emission limit, with the applicant's proposed emission limits as the starting point for this determination; and



6. Competition for PSD Class I increments may exist in the future due to new cogenerators locating in the area. An arbitrarily low emission limit for Tarmac, coupled with other new plants in the area, might preclude Tarmac from raising their emission limits in the future due to limited PSD increment availability.

As we understand it, your staff will be reviewing the new information we submitted within the next three weeks, and any decision to revise the draft BACT will be made within 30 days of our meeting. Please call if you have any questions on this matter.

Sincerely,

*David A. Buff*

David A. Buff, M.E., P.E.  
Principal Engineer

DAB/dpy

cc: Bruce Miller, EPA  
Al Townsend, Tarmac Florida  
Barry Andrews, FDER  
*J. Reynolds*  
*M. Finn*  
*J. Goldman, SE Dist.*  
*P. Wong, DERM*  
*C. Shaver, NPS*  
*CHF/JKP*



# Tarmac

TARMAC FLORIDA, INC.

P.C. Box 2998  
Hialeah, Florida 33012

VIA HAND DELIVERY

April 16, 1990

Mr. David Schwartz  
Office of General Counsel  
Florida Department of  
Environmental Regulation  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

*Expires  
May 18  
now 6/15  
verbally by 6/4*

RE: Kiln No. 2 Coal Conversion  
DER File No. AC 13-189901  
PSD-FL-142

Dear Mr. Schwartz:

Tarmac received the *Notice Of Intent To Issue Permit* for the above referenced facility on April 4, 1990. Tarmac must take exception to Specific Condition 3., 4., and 5. and requests the fourteen (14) day time limit for filing a petition for an administrative determination (hearing) under Section 120.57, Florida Statutes be waived for an additional thirty (30) days.

The singular concern of Tarmac is that the SO<sub>2</sub> and NO<sub>x</sub> emission limits proposed by the Department are not achievable in Kiln No. 2. The proposed emission limits are from the BACT analysis contained in the *Technical Evaluation and Preliminary Determination* for the referenced facility. There are site-specific technical considerations which render the proposed emission rates as not achievable and economic considerations preclude the use of a different type of kiln or different process. The additional time will allow Tarmac to discuss with the Department the site-specific aspects and data for this project along with the BACT determination procedure.

I look forward to providing any additional information you or the Department may need to reach a resolve to this matter. Should you have any questions please call me at (305)823-8800.

Sincerely,

  
Scott Quads

Environmental Specialist

cc: C. Fancy - FDER, Tallahassee