



Titan Florida
11000 NW 121 Way
Medley, FL 33178
Telephone (305) 200-1655
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July 28, 2010

Ms. Mallika Muthiah
Air Section Chief
DERM
701 NW 1st Ct., Fourth Floor
Miami, FL 33136

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
FDEP
2600 Blair Stone Rd.
M.S. #5505
Tallahassee, FL 32399

United States Environmental Protection Agency, Region 4
Air, Pesticides, and Toxic Management Division
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960
(404) 562-9077

Re: *Submittal of §63.10(e) (3) (vi) Summary Report and §63.10(e) (3) (i) Excess Emissions and CMS Performance Report*
Tarmac America LLC – Pennsuco Complex - Medley, Florida

In accordance with the provisions of 40 CFR Part 63.10(e)(3), Tarmac America, LLC. is submitting this summary report for the Pennsuco facility. This report covers the period January 1 through June 30, 2010. Certain affected facilities were subject to NSPS Subpart F through June 13, 2002 after which they were no longer applicable to NSPS Subpart F. On an after June 14, 2002, these affected sources became subject to the reporting requirements under NESHAP Subpart LLL, which requires submission of a semi-annual summary report.

SUMMARY REPORT – GASEOUS AND OPACITY EXCESS EMISSIONS AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

Name and address (physical location) of the source:

Tarmac America, LLC
11000 NW 121st Way
Medley, Florida 33178

Hazardous Air Pollutants monitored at the source:

- Opacity, as a surrogate for metal HAPs
- Temperature, as a surrogate for dioxin/furan emissions

Description of the process units:

The primary affected source at the facility is the kiln, which is used to produce clinker by heating limestone and other materials for subsequent production of Portland Cement. Emissions from the kiln are controlled by a baghouse and exhausted through the main stack. Clinker from the kiln is sent through a clinker cooler, which is controlled by the main baghouse before exhausting to the atmosphere. There are also several material handling points within the plant that are potential sources of emissions.

Emission and operating parameter limitations specified in standard:

Per the list of relevant standards in Table 1 of 40 CFR 63.1342,

- Main stack exhaust is limited to 0.40 ng TEQ/dscm for dioxin/furan emissions
- Main stack exhaust is limited to 10% opacity on a six-minute block average basis
- All other exhausts are limited to 5% opacity on a six-minute block average basis

Other Required Information:

The Continuous Opacity Monitor System (COMs) manufacturer and model information are:

<u>Location</u>	<u>Emission Unit Number</u>	<u>Model Number</u>	<u>Serial Number</u>
Main Stack	EU 028	Durag DR-290AW	410705

The Continuous Opacity Monitor System (COMS) certifications for the main stack were performed October 10, 2006.

ADDITIONAL INFORMATION REQUIRED BY NESHAP SUBPART LLL

Per 40 CFR 63.1354(b)(9), TARMAC AMERICA, LLC is submitting the following information.

- Exceedances of maximum control device inlet temperature sensors – None
- Failures to calibrate thermocouples – None
- Results of any combustion system components inspections conducted:

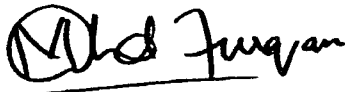
Inspection performed during an outage in June 2010 when representative from Envirocare, PSTek and Bigelow-Liptak performed a full preventive maintenance inspection, adjustment, and repair as required to maintain optimum firing efficiency.

- Failure to comply with any provision of the operations and maintenance plan:
Three (3) incidents discussed in Table 2 of the Periodic Start-up, Shutdown, and Malfunction Report.

Tarmac America, LLC is submitting the startup, shutdown, and malfunction report with this report under separate cover. As noted in §63.10(d) (5) (i), the startup, shutdown, and malfunction report can be submitted simultaneously with the summary report.

By signing this letter, I certify that I am a responsible official as that term is defined in 40 CFR 63.2. I further certify, based on reasonable inquiry that the enclosed report is to the best of my knowledge and belief true, accurate, and complete.

Sincerely,



Muhammad Khan, E.I.
Environmental Engineer



Terry Lancaster
Environmental Manager

cc: Daniel Crowley

JANUARY 1 – JUNE 30, 2010 NESHAP SUBPART LLL OPACITY AND CMS REPORTS

A Titan Group Company

**Continuous Emission Monitor Report Summary
Thermocouple Excess Emission and Monitoring System Performance**

Pollutant: APCD Temperature
Temperature Limitation: 241.2⁰F & 421.1⁰F
Reporting Period: Jan 1, 2010 through June 30, 2010
Company Name: Tarmac America LLC
Address: Medley, FL
Process Unit Description: Main Baghouse (EU 028)
1) Instrument Manufacturer: Pyco
Instrument Model / ID: Type K Probe / SO# 20463
Certificate No:
Performance Evaluation: 02/24/2010
Install Date: 05/28/2010

Total Source Operating Time: 92,830 Minutes
Total Minutes in Reporting Period: 260,640 Minutes

CEMS (RFD) Performance Summary

	Duration (1)	% Unavailable (2)
1. TC downtime in reporting period due to:		
a. Monitor Equipment Malfunction	0	0
b. Non-Monitor CMS Malfunction	0	0
c. Calibration/QA	60	0.0646
d. Other Known Causes	0	0
e. Other Unknown Causes	0	0
2. Total COMS downtime:	60	0.0004

Emission Summary Data

	Duration (1)	% Excess Emissions (3)
1. Excess emissions in reporting period due to:		
a. Startup/shutdown	0	0
b. Control Equipment Malfunction	0	0
c. Process Problems	0	0
d. Other Known	0	0
e. Other Unknown	0	0
2. Total duration of excess emissions	0	0.0

(1) All duration reported in 1-minute periods

(2) % Unavailable is calculated by the following formula:

$$\% \text{ Unavailable} = \text{CEMS downtime during source operating time} / \text{source operating time} * 100$$

(3) % Excess Emissions is calculated by the following formula:

$$\% \text{ Excess Emissions} = \text{Total duration of excess emissions} / \text{source operating time} * 100$$

**Continuous Emission Monitor Report Summary
Opacity Excess Emission and Monitoring System Performance**

Pollutant: Particulate Matter
Emission Limitation: 10 %
Reporting Period: January 1 through June 30, 2010

Company Name: Tarmac America LLC
Address: Medley, FL
Process Unit Description: Main Stack (EU 028)
Instrument Manufacturer: Durag
Instrument Model: DR-290AW
Serial Number: 410705
Last Performance Evaluation: 05/26/2010
Total Source Operating Time: 92,830 Minutes
Total Minutes in Reporting Period: 260,640 Minutes

COMS Performance Summary

	Duration (1)	% Unavailable (2)
1. COMS downtime in reporting period due to:		
a. Monitor Equipment Malfunction	0	0
b. Non-Monitor COM Malfunction	0	0
c. Calibration/QA	468	0.504
d. Other Known Causes	0	0
e. Other Unknown Causes	0	0
2. Total COMS downtime:	0	0

Emission Summary Data

	Duration (1)	% Excess Emissions (3)
1. Excess emissions in reporting period due to:		
a. Startup/shutdown	0	0
b. Control Equipment Malfunction	0	0
c. Process Problems	0	0
d. Other Known	0	0
e. Other Unknown	0	0
2. Total duration of excess emissions:	0	0

(1) All duration reported in 1-minute periods

(2) % Unavailable is calculated by the following formula:

$$\% \text{ Unavailable} = \text{CEMS downtime during source operating time} / \text{source operating time} * 100$$

(3) % Excess Emissions is calculated by the following formula:

$$\% \text{ Excess Emissions} = \text{Total duration of excess emissions} / \text{source operating time} * 100$$

Opacity Performance Summary

Company: Pennsuco Complex	Report Period: 01/01/2010 00:00 Through 06/30/2010 23:59
Address: 11000 NW 121st Way Medley, FL 33178	Total Source Time in Report Period: 92830 Minutes
Source: TARMAC	Time Online Criteria: 6 Minute(s)
Pollutant: OPACITY (OPACITY PERCENT) percent	Manufacturer: Durag
Interval: 6 Minute	Model Number: D-R290AW
Standard Limit: 10	Cert. Date: 26-May-10
Exceptional Limit: 10	

No Excess Emissions Found

Causes of COMS Downtime	Duration of Downtime (Minutes)	Percent of Operating Time
Shutdown (08)	0	0.00
Total duration of downtime	0	0.00

This is to certify that to the best of my know(ledge) the information provided in this report is true, accurate and complete.

Terry Lawrence

 Name
[Signature]

 Signature

Environmental Manager

 Title
28 July 10

 Date



Titan Florida
11000 NW 121 Way
Medley, FL 33178
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July 28, 2010

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Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
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United States Environmental Protection Agency, Region 4
Air, Pesticides, and Toxic Management Division
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

VIA CERTIFIED U.S. MAIL, No. (USEPA)
VIA EMAIL: (FDEP) & (DERM)

Re: Submittal of §63.10(d) (5) Periodic Startup, Shutdown, and Malfunction Report
Tarmac America LLC, Medley, FL

In accordance with the provisions of 40 CFR Part 63.10(d) (5) (i), **Tarmac America, LLC** is submitting this periodic *Startup, Shutdown, and Malfunction Report* for the **Pennsuco** Complex.

Reports are only required if a startup, shutdown, or malfunction (SSM) occurred during the reporting period. This report also includes a summary of the startup and shutdown events where the SSM Plan was not followed, and an exceedance of the relevant standard occurred. In the event of such occurrences, Tarmac America, LLC submitted to your office within seven working days after the end of the event when the SSM Plan was *not* followed.

By signing this letter, I certify that, having been duly authorized by Tarmac America, LLC, Environmental Manager, I am a responsible official as that term is defined in 40 CFR 63.2. I further certify, based on reasonable inquiry, that the enclosed Startup, Shutdown, and Malfunction Report is to the best of my knowledge and belief true, accurate, and complete.

Muhammad Khan, E.I.
Environmental Engineer

Terry Lancaster
Environmental Manager

cc: Daniel Crowley, Tarmac America, LLC

PERIODIC SSM Report

LOCATION: Tarmac America, LLC
11000 121st Way
Medley, FL 33178

CONTACT PERSON: T. Lancaster
Environmental Manager
561-504-6787

Actions taken in response to startup and shutdown events during the reporting period were consistent with those outlined in the facility's SSM Plan, with the exception of those startup and shutdown events where the SSM plan was not followed and an exceedance of the relevant standard occurred. Startup and shutdown events where the SSM Plan was *not* followed and an exceedance of the relevant standard occurred are listed below in Table 1:

TABLE 1. STARTUP AND SHUTDOWN EVENTS WHERE SSM PLAN NOT FOLLOWED

Date	Emission Unit Number/Description	Duration	Reasons for Not Following SSM Plan	Exceedances
03-17-2010	EU 28	6 Minutes	Lost communication due to broken transmitter	10.8

LOCATION: Tarmac America, LLC
11000 121st Way
Medley, FL 33178

CONTACT PERSON: T. Lancaster
Environmental Manager
561-504-6787

PERIODIC SSM Report

Actions taken in response to malfunction event during this reporting period were consistent with those outlined in the facility's SSM Plan, with the exception of the following events. Malfunction events where the SSM Plan was *not* followed and excess emissions occurred are listed below:

TABLE 2. MALFUNCTIONS WHERE SSM PLAN NOT FOLLOWED

Date	Emission Unit Number/ Description	Duration	Reasons for Not Following SSM Plan	Exceedances
01/07/2010	EU 28	6 Minutes	Communication error	14.3
03/17/2010	EU 28	6 Minutes	Cooler Fan	14.8
03/17/2010	EU 28	6 Minutes	Cooler Fan	10.1

LOCATION: Tarmac America, LLC
11000 121st Way
Medley, FL 33178

CONTACT PERSON: T. Lancaster
Environmental Manager
561-504-6787

PERIODIC SSM Report

Malfunction events during this reporting period where the SSM Plan was followed and excess emissions occurred are listed below:

TABLE 3. MALFUNCTIONS WHERE SSM PLAN WAS FOLLOWED

Date	Emission Unit Number/Description	Duration	Reasons for Exceedances	Exceedances
01-07-2010	EU 28	6 Minutes	Startup	11.6
03-29-2010	EU 28	6 Minutes	Shutdown	11.5
05-26-2010	EU 28	6 Minutes	Raw Mill Startup	11.9
05-27-2010	EU 28	6 Minutes	Raw Mill Startup	10.2



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Air Section Chief
DERM
701 NW 1st Ct, Suite 400
Miami, FL 33136

*Re: Submittal of Title V Permit Number 0250020-021-AV, Section III, Subsection B (10) (d) Data Availability, Continuous Monitoring System Performance Report
Tarmac America LLC – Pennsuco Complex, Medley, Florida*

In accordance with the provisions of Title V Permit Number 0250020-021-AV, Section III, Subsection B(10)(d), Data Availability requiring a Continuous Monitoring System Performance Report when valid hourly averages are not obtained for 95% of the time the plant is producing clinker, Tarmac America, LLC is submitting this Continuous Monitoring System Performance report for the Pennsuco Complex. This report covers the period Jan 1 through June 30, 2010. This section of the Title V permit requires this report to be submitted within 30 days following the end of each reporting period.

By signing this letter, I certify that I am a responsible official as that term is defined in 40 CFR 63.2. I further certify, based on reasonable inquiry that the enclosed report is to the best of my knowledge and belief true, accurate, and complete.

Sincerely,

Handwritten signature of Muhammad Khan in black ink.

Muhammad Khan, E.I.
Environmental Engineer

Handwritten signature of Terry Lancaster in black ink.

Terry Lancaster
Environmental Manager

cc: Daniel Crowley

Continuous Monitoring System Performance

Name and address (physical location) of the source:

Tarmac America, LLC
 11000 NW 121st Way
 Medley, Florida 33178

Air Pollutants monitored at the source:

- Opacity
- SO₂
- NO_x
- CO
- VOC calculated by THC minus Methane

Description of the process units:

The primary affected source at the facility is the kiln, which is used to produce clinker by heating limestone and other materials for subsequent production of Portland cement. Emissions from the kiln are controlled by a baghouse and exhausted through the main stack. Clinker from the kiln is sent through a clinker cooler, which is controlled by the main baghouse before exhausting to the atmosphere. There is also several material handling points within the plant that are potential sources of emissions.

Monitor Information:

Continuous Opacity Monitor System (COMs) manufacturer and model information are:

<u>Location</u>	<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>
Main Stack EU 028	Siemens	Durag DR-290AW	410705

Data Availability: 100%

Sulfur Dioxide manufacturer and model information are:

<u>Location</u>	<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>
Main Stack EU 028	Siemens	Ultramat/Oxymat 6	NT-R4-0732

Data Availability: 92.4%

Nitrogen Oxides manufacturer and model information are:

<u>Location</u>	<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>
Main Stack EU 028	Siemens	Ultramat 6	T3-696

Data Availability: 97.1%

Carbon Monoxide manufacturer and model information are:

<u>Location</u>	<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>
Main Stack EU 028	Siemens	Ultramat 6	T3-696

Jan 1, 2010 through June 30, 2010

Summary Report & Excess Emissions and CMS Performance Report

Data Availability: 97.1%

Total Hydrocarbon manufacturer and model information are:

<u>Location</u>	<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>
Main Stack EU 028	Thermo Environmental	51C-HT	0427108299

Data Availability: 96.6%

Methane manufacturer and model information are:

<u>Location</u>	<u>Manufacturer</u>	<u>Model Number</u>	<u>Serial Number</u>
Main Stack EU 028	Siemens	Ultramat 6	T3-696

Data Availability: 97.0%