

Golder Associates Inc.

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January 22, 2007

RECEIVED

053-7642

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Bureau of Air Regulation
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

BUREAU OF AIR REGULATION

Attention: Mr. Alvaro Linero, P.E., South Permitting Section Administrator

**RE: TITAN AMERICA PENNSUCO CEMENT PLANT
FDEP FILE NO. 0250020-018-AV
DRAFT TITLE V OPERATION PERMIT**

Dear Mr. Linero:

Please find attached Titan America and Golder Associates Inc. comments on the draft Title V air operation permit, issued December 6, 2006. Most of the comments are minor in nature; however, some have significant implications. After reviewing the requested changes, feel free to call me at (352) 336-5600 or Terry Lancaster at (954) 425-4227 to discuss the comments further.

Thank you for consideration of this request.

Sincerely,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read "David A. Buff for".

David A. Buff, P.E., Q.E.P.
Principal Engineer
Florida P.E. #19011

DB/all

cc: T. Lancaster, Titan America, LLC
Miami-Dade County

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**TARMAC AMERICA
TITAN PENNSUCO FACILITY
COMMENTS ON DRAFT APPLICATION PACKAGE**

Public Notice of Intent to Issue Title V Air Operation Permit Renewal

In the first list of bullet items, first bullet item – “2,400,000 TPY of Portland cement” is indicated to be a permit limit. However, it is not a limit contained in any previous construction permit.

Statement of Basis

Page 1 of 4 - In the first list of bullet items, first bullet item – “2,400,000 TPY of Portland cement” is indicated to be a permit limit. However, it is not a limit contained in any previous construction permit.

Page 2 of 4 - bottom of page – “CONTINUOUS ASSURANCE MONITORING (CAM) PLAN” should read “**COMPLIANCE** ASSURANCE MONITORING (CAM) PLAN”.

Page 3 of 4 – bottom of page – heading should read “Control Equipment **not** Subject to CAM”.

Draft Title V Permit

Placard Page

Effective date of permit should be changed to sometime in early 2007, with expiration date 5 years later in 2012.

Section I. Subsection A. Facility Description.

6th paragraph – remove “aggregate” from the paragraph, since it has no baghouses and all material handled is wet. Reasonable precautions are used in the aggregate plant.

Section II. Facility-Wide Conditions

Specific Condition (SC) 7. Emissions of Unconfined Particulate Matter - This condition should just refer to Section G, Facility Fugitive Emissions. The listed reasonable precautions are general and do not specifically apply to the Pennsuco facility. Specific measures are contained in Section G.

Section III. Subsection D. Cement Plant Finish Mills 1 - 6

SC 3. Visible Emissions Limits – Reword as follows to identify the specific baghouses subject to monthly versus daily VE readings.

Visible emissions are limited to 5 percent from each of the above listed baghouses. **For baghouses F-113, F-213, F-313, and 516.BF510**, compliance shall be determined in the manner described in 40 CFR 63, Section 63.1350(a)(4)(i), (ii), (iii) and (iv).....

SC 4. Finish Mill Monitoring – Reword as follows to identify the specific baghouses subject to monthly versus daily VE readings.

For baghouses F-130, F-230, F-332, 533.BF340, F-432, F-430, F-730, 536.BF340 and 536.BF500, the owner or operator shall monitor opacity by conducting daily visual emissions observations.....

Section III. Subsection F. Cement Plant Coal & Petroleum Coke Handling System

Paragraph following Brief Description – reword “(Appendix Y attached)” to “Appendix A and Appendix Y attached”.

SC 3. Visible Emissions Limits – reword first sentence as follows: “Visible emissions are limited to 5 percent from each of the above listed baghouses, **except for the coal mill main baghouse 461.BF500.**”

Section III. Subsection H. Aggregate Plant.

SC 4. Particulate Matter Limitations – the stated emission of 35.4 TPY of PM and 14 TPY of PM₁₀ are not stated in any previous air construction permit. The reference is to permit no. 0250020-012-AC; however, this permit does not contain any such limit, nor does any specific condition of permit no. AC 13-234568 contain such a limit. Permit no. AC 13-234568 contains a statement in the description as follows:

“The modified facility is expected to emit maximum annual emission of 35.4 TPY of PM and 14 TPY of PM₁₀ based on AP-42 emission factors calculated and submitted with application to this office (thereby avoiding PSD review).”

However, this does not constitute an emission limit. Therefore, these limits should be deleted from the permit.

SC 13. Unconfined Emissions of Particulate Matter. – This condition appears to be redundant with SC 15 and with Appendix CG. Therefore, this condition can be eliminated.

Section III. Subsection J. Concrete Batch Ready Mix Plant.

SC 2. Permitted Capacity. – The production rates of 243.75 TPH and 130 cubic yards per hour and not contained in the air construction permit no. AC13-158138. therefore, these limits should be removed.

SC 6. Unconfined Emissions of Particulate Matter. – delete the “N” in “Specific Condition N.7.”

Section IV. Common and General Condition, Facility-Wide Requirements

SC 5. – delete EU 023 from this condition, since it is not subject to Subpart OOO.

Appendix CT – change to read “Appendix CF”.

Appendix CAM.

In Table 1, for “Indicator Range”, add the following: “An excursion is defined as five consecutive 6-minute average of opacity greater than 5.0%, **excluding startup, shutdown and malfunction.**” The SSM provision needs to be added since higher opacity levels may occur during SSM, and the CAM rules specifically exclude SSM events.