



FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

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*Sent by Electronic Mail – Received Receipt Requested*

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Mr. Marco Burgoa, Plant Manager  
Tarmac America, LLC  
11000 NW 121 Way  
Medley, FL 33178

Re: **Request for Additional Information No. 2**  
Project No. 0250020-035-AC  
Tarmac America, LLC, Pennsuco Cement Plant  
Tires, Materials, Emission Limit Revisions

Dear Mr. Burgoa:

The Department reviewed the response dated August 1, 2013 to our previous request for additional information (RAI). We appreciated the feedback we received during our teleconference today regarding the preliminary versions of the draft permit and technical evaluation that we provided to you and Koogler and Associates. A few items came up during the teleconference that suggest the need for some additional information that, if promptly provided, will allow us to proceed with issuance of an official draft permit that is a little closer to what is being requested.

1. The application requested removal of the requirement to use calcium carbonate residuals as a raw material as follows:

*“Tarmac requests that the language in Section B.3.b. from the current Title V Operation Permit be changed to allow limestone from any supplier to be incorporated and be changed to the following”:*

**Calcium Carbonate Source:** *The permittee is hereby authorized to use CaCO<sub>3</sub> (i.e. limestone residuals) from the lagoons of the Miami-Dade County Water Treatment Plants as a raw material supplement in the clinker production process. Use of CaCO<sub>3</sub> residuals from any other source shall require prior written approval from RER. The material shall be subject to analytical testing requirements for chloride and mercury content as determined by the RER. Results of such testing shall be maintained on file.*

The pre-draft permit revised the condition as requested with a clarification that the residuals are “CACO3 residuals” rather than limestone. Based on comments received during the August 30<sup>th</sup> teleconference, we now understand that you are also requesting removal of the requirement to provide test results for chloride and mercury. Please provide the initial data collected showing chloride and mercury levels. We will consider removal of the requirement to report test results based on the data provided and the existing conditions in other valid permits requiring the monitoring of mercury levels in the raw materials and fuels.

2. In the original application, Tarmac requested unlimited whole tire introduction. We understood from prior permits issued by the Miami-Dade County program that whole tires would be introduced in the area of the riser. Basically, the pre-draft permit changed the limitation of the previous Miami-Dade permit by increasing the firing rate from 1.65 to 3 tons/hour at the known location based on the application for the automated tire injection system. The test burn requirement and reporting contained in the Miami-Dade permit was removed. During August 30<sup>th</sup> teleconference, you requested authorization to fire whole tires in the kiln. For this case, we request more specificity if,

for example, the request encompasses whole tire introduction near the main kiln burner. We would like to have a discussion on this issue include your Director of Alternative Fuels, Mr. Haberer, to describe the level of detail that will suffice prior to your written response.

3. We request the production, fuel feed, and emissions data from the Alternative Solid Fuels (ASF) engineering tests that have been conducted. This might support the concept relayed to us that NO<sub>x</sub> emissions indeed decreases with the use of the ASF at this specific kiln. Again, a short conversation to also include Mr. Haberer will help us mutually converge on the data we actually need.

Please let us know promptly if you would like us to proceed without the above information in accordance with Rule 62-4.050(4), F.A.C.

Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): *“The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department ..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application.”*

If you have any questions regarding this matter, please contact me at [jeff.koerner@dep.state.fl.us](mailto:jeff.koerner@dep.state.fl.us) or call me at 850/717-9083.

Sincerely,

Jeffery F. Koerner, Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

cc:

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