



FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

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HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

Mr. Kevin Baird
Responsible Official
Tarmac America, LLC
11000 NW 121 Way
Medley, FL 33178

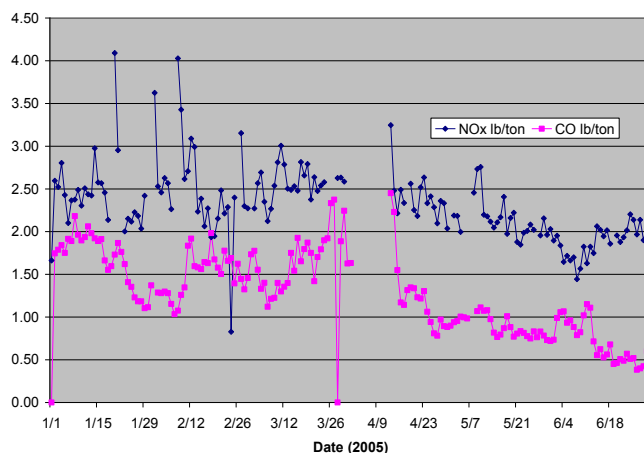
Re: **Request for Additional Information**
Project No. 0250020-035-AC
Tarmac America, LLC, Pennsuco Cement Plant
Request to Revise Certain Permit Conditions and Construction of a Clinker Conveyor Line

Dear Mr. Baird:

The Department received your application to modify certain permit conditions of already issued permits and to construct a conveyor line at the Miami Cement Plant. We appreciated the opportunity provided during our previous telephone conversation with the environmental manager to discuss the preliminary status of this request. Based on the review of the application, the Department has determined that the application is incomplete and requires the submittal of additional information as described below.

1. Tarmac requests to delete the short term NO_x emission limit of 720 lb/hr based on a 24-hr block average.

To evaluate this request, please submit a chart representative of the continuous emissions monitoring (CEM) for NO_x (2 years representative period) including short and long term data. The summary chart example below is taken from the 2005 technical evaluation and preliminary determination (TEPD) for this pollutant.



During the last 2011 construction permitting process (0250020-031-AC) to evaluate the burning of alternate solid fuels (ASF), the Department concluded in its TEPD (page 10): *The applicant's projected actual emissions include the physical change of replacing the main kiln burner, which is not expected to increase emissions. The Department notes that the applicant's projected actual*

emissions are based on an annual clinker production rate that is less than the baseline period due to the economic downturn. This is the reason for the projected “reductions”. However, the applicant estimates that short-term emissions would not increase; therefore, there would be no significant net emissions increases even when assuming an equivalent production rate. Total project emissions are not expected to exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review. For a period of five years following completion of construction, the Department will require a comparison of projected actual emissions to baseline actual emissions to ensure that the project did not cause a PSD-significant emissions increase.”

Please provide reasonable assurance that the short term emissions (underlined) will not be exceeded.

2. Request to construct a clinker conveyor line.

To evaluate this request, please let us know: Is any baghouse associated with this emission point or are all emissions fugitive? If there is a baghouse, please provide the proposed baghouse design specifications as indicated in this EU description (Cement Plant Clinker & Storage System) of emission points.

The application states that the new conveyor (to re-use older clinker material stored during past operations to substitute input of fresh clinker into the cooler system) would be added as an emission point to EU 027; and, that it will not increase the current permitted amount of material to the kiln system. Proposed PM/PM₁₀/PM_{2.5} fugitive emissions are 0.037/0.012/0.003 TPY respectively. Although permitted material throughput rates are not expected to increase, what effect will this new conveyor have on the actual material throughput and actual emissions rates?

3. Request to replace Finish Mill No. 4 Dust Collector (EU 013 – Emission Point I.D.432) with two existing but unused Mikropul dust collectors.

To evaluate this request, please submit the process rate of this operation. Finish Mill No. 4 is allowed by current Title V permit to process 140 TPH (Condition D.2). If the operation of Finish Mill No. 4 results in 17,000 actual cubic feet per minute (acfm) of exhaust air that is currently controlled by the existing baghouse, how will this be accomplished with the two replacement baghouses that have a combined flow of only 16,000 acfm?

4. Request to address and include in Appendix I certain insignificant emissions including the use of an on-site laboratory dust collector and railcar painting.

The application submitted did not include a request for concurrent revision of the Title V permit; therefore, these new insignificant emissions activities will be added to Appendix I, List of Insignificant Emissions Units and Activities the next time the Title V permit is opened for revision or renewal.

5. Request to include whole tires as part of the tire derived fuel stream listed under permit No. 0250020-031-AC; and, also to remove the tire feed rate of 1.65 TPH (24-hr block average) to allow for unlimited use of tire derived fuel (including whole tires).

It appears that permit No. 0250020-029-AC imposed the limit of 1.65 tons per hour of tires to limit the PM emissions to an increase of 24 tons per year in order to avoid triggering PSD at that time. To evaluate this request, please explain the kiln and/or precalciner feed system capabilities for accommodating a higher feed rate for whole tires and provide an explanation of why you believe PSD would not be triggered as a result of increasing the limit for tires from 1.65 tons per hour up to the full 15 tons per hour allowed by permit No. 0250020-031-AC for all alternative. Further, please propose permit language to clarify the Tarmac concerns regarding conflicting conditions between permit Nos. 0250020-029-AC and 0250020-031-AC.

6. Request to change the language of current Title V permit (B.3.b) to allow limestone from any supplier to be incorporated

The application submitted did not include a request for concurrent revision of the Title V permit; therefore, this issue will be considered the next time the Title V permit is opened for revision or renewal. However, the underlying construction permit (0250020-025-AC) will be revised to address this request.

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 call or write Jonathan Holtom at 850/717-9039 or jonathan.holtom@dep.state.fl.us or Teresa Heron at 850/717-9082 or teresa.heron@dep.state.fl.us.

Sincerely,

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

Mr. Kevin Baird, Tarmac (kbaird@titanamerica.com)
Mr. Muhammad Khan, E.I. (mkhan@titanamerica.com)
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