Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

May 2, 2006

CERTIFIED MAIL – Return Receipt Requested

Mr. James Daniel
Cement Plant Manager and Responsible Official
Florida Crushed Stone Company
Post Office Box 1508
Brooksville, Florida 34605-1508

Re: PROPOSED Title V Air Operation Permit Renewal Project No.: 0530021-011-AV
Florida Crushed Stone Company
Brooksville Cement and Power Plants

Dear Mr. Daniel:

One copy of the "PROPOSED Determination" for the for the Florida Crushed Stone Company's Brooksville Cement and Power Plants located off Cobb Road 2 miles Northwest of Brooksville, Brooksville, Hernando County, is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been provided to the United States Environmental Protection Agency (USEPA) Region 4 office for their review. The web site address is:

"http://www.dep.state.fl.us/air/eproducts/ards/default.asp"

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Title V Permit Renewal was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Bruce Mitchell at 850/413-9198.

Sincerely,

Trina L. Vielhauer
Chief
Bureau of Air Regulation

TLV/rbm

Enclosures

Copy furnished to:
Ms. Mara Nasca, SWD
Ms. Fawn Bergen, P.E., K&A
Mr. Hamilton Oven, P.E., DEP-SCO
U.S. EPA, Region 4 (INTERNET E-mail Memorandum)

PROPOSED Determination

Florida Crushed Stone Company

Brooksville Cement and Power Plants

Title V Air Operation Permit Renewal
PROPOSED Permit No.: 0530021-011-AV

I. Public Notice.

An "INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" to the Florida Crushed Stone Company's (FCSC) Brooksville Cement and Power Plants located off Cobb Road 2 miles Northwest of Brooksville, Brooksville, Hernando County was clerked on December 19, 2005. The "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was published in the Hernando Today on January 15, 2006. The DRAFT Title V Air Operation Permit Renewal was available for public inspection at the Department's Southwest District office in Tampa and the permitting authority's office in Tallahassee. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT RENEWAL" was received on February 1, 2006.

II. Public Comment(s).

Comments were not received during the 30 (thirty) day public comment period, but were received via an e-mail on March 7, 2006, by a letter on March 9, 2006, and via e-mails on March 16 and 17, 2006, from Ms. Fawn W. Bergen, P.E. of Record, with Koogler & Associates. The comments are not considered to be significant, such that the changes being made do not require another Public Notice. The comments will be restated as they were presented in the referenced e-mails and attached letter and the Department's response will follow each comment. Where a previous response is appropriate for another comment, then that response will be referenced.

A. E-mail received March 7, 2006, and letter received March 9, 2006 (same comments).

1. DRAFT Title V Permit.

a. Section I. Subsection A. Facility Description. Page 2: 6th Sentence.

Comment: FCSC plans to install a "Johnston-Marsh or equivalent dust suppression system" to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. This sentence was revised to reflect this.

Response: The comment is acceptable and the following change will be made:

FROM:

For the Clinker Receiving/Handling System, the fugitive particulate matter emissions generated from the transfer of clinker from the receiving hopper to the belt conveyor are controlled using some type of wetting agent; and, other types of particulate matter control may be required depending on how the system is actually operated.

TO:

For the Clinker Receiving/Handling System, the fugitive particulate matter emissions generated from the transfer of clinker from the receiving hopper to the belt conveyor are controlled using a Johnston-Marsh or equivalent dust suppression system.

b. Section I. Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s), Page 2: Table.

Comment: The facility ID numbers and emission unit descriptions have been clarified for EUs 009, 010, 014, and 021.

Response: The comment is acceptable and the following changes will be made to the table:

FROM:

E.U. ID No./Facility ID No.	Brief Description
Brooksville Cement Plant I	
-009/L-03	Clinker Cooler Discharge to Deep Bucket Conveyor with Baghouse
-010/L-06 & L-07	Clinker Storage Silo and Finish Mill Storage Silo with Baghouse
-014/Q-17	Cement Storage Silos #1 & #2 Discharge System with Baghouse
-021/Z-17	Cement Storage Silo #3 Discharge System with Baghouse

TO:

E.U. ID No./Facility ID No.	Brief Description
Brooksville Cement Plant I	
-009/K-07 & L-03	Clinker Cooler Discharge with Baghouse
-010/L-06 to L-05 & L-07	Clinker Storage Silos with Baghouse
-014/Q-17	A-Side Cement Storage Silos #1 & #2 Discharge System with Baghouse
-021/Q-18	B-Side Cement Storage Silos #1, #2 & #3 Discharge System with Baghouse

c. Section III. Subsection B, Page 8: Table.

Comment: The facility ID numbers and emission unit descriptions have been clarified for EU 009/K-07&L-03, EU 010/L-06 to L-05&L-07, EU 014/Q-17 and EU 021/Q-18.

Response: See "Response" to A.1.b.

d. Section III. Subsection B. Pages 8-10.

Comment: The terminology "actual" has been changed to "nominal" due to the routine fluctuation in the flow rates and the corresponding flow rate at dry standard conditions have been placed in parentheses for all the affected emission units.

Response: The comments are acceptable and the following example will show how all of the flow rate values will be changed:

FROM:

Filter Dust Bin with Baghouse. This emissions unit is a storage bin for fines (dust). The particulate matter (PM) emissions from the materials being transferred are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The actual volumetric flow rate is 6,800 acfm; and, the maximum dry standard flow rate is 6,686 dscfm.

TO:

Filter Dust Bin with Baghouse. This emissions unit is a storage bin for fines (dust). The particulate matter (PM) emissions from the materials being transferred are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The nominal volumetric flow rate is 6,800 acfm (6,686 dscfm).

e. Section III. Subsection B. Pages 9 & 10.

Comment: The emission unit descriptions have been clarified for EU 009 (Clinker Cooler Discharge with Baghouse), EU 010 (Clinker Storage Silos with Baghouse), EU 014 (Cement Storage Silos #1 and #2 A-Side Discharge System with Baghouse), and EU 021 (Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse).

Response: See "Response" to A.1.b.

f. Section III. Subsection B. Page 11. Specific Condition B.3.: Permitted Capacity.

Comment: The emission unit descriptions have been clarified for EUs 009, 010, 014, and 021.

Response: See "Response" to A.1.b.

g. Section III. Subsection B. Page 12. Specific Conditions B.4.a. & b.: Hours of Operation.

Comment: The emission unit name has been revised for Silo #3 Discharge System.

Response: See "Response" to A.1.b. and the emission unit name has been revised from "Silo #3 Discharge System" to "B-Side Cement Storage Silos #1, #2 & #3 Discharge System".

h. Section III. Subsection B. Page 12. Specific Condition B.7.: Particulate Matter.

Comment: The emission unit descriptions have been clarified for EUs 009, 010, 014, and 021.

Response: See "Response" to A.1.b.

i. Section III. Subsection B. Page 16. Specific Conditions B.21.(a) & (a)(3).

Comment: This condition has been revised to reflect two minor editorial comments. The request is to delete "this" in the 2nd line and rename "(a)(4)." with "(a)(3)."

Response: The request is acceptable to delete "this" in the 2nd line. The citing of (a)(4)., which reflects the citing in the NESHAP regulation [40 CFR 63.1350(a)(4)], will not be changed. Since the regulation of 40 CFR 63.1350(a)(3) does not apply, then the notation of (a)(3) will be added along with "Not applicable" as follows:

FROM:

B.21.(a) The owner or operator of each Portland cement plant shall prepare for each affected source subject to the provisions of this 40 CFR 63, Subpart LLL, a written operations and maintenance plan. Appendix O & M (Operation & Maintenance Plan) (attached) is a part of this permit and this subsection. The plan shall be submitted to the Administrator for review and approval as part of the application for a 40 CFR Part 70 permit and shall include the following information:
(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emission limits and operating limits of 40 CFR 63.1347 and 40 CFR 63.1348 (See Specific Condition **B.8.**);
(2) Corrective actions to be taken when required by paragraph 40 CFR 63.1350(e); and
(4) Procedures to be .....

TO:

B.21.(a) The owner or operator of each Portland cement plant shall prepare for each affected source subject to the provisions of 40 CFR 63, Subpart LLL, a written operations and maintenance plan. Appendix O & M (Operation & Maintenance Plan) (attached) is a part of this permit and this subsection. The plan shall be submitted to the Administrator for review and approval as part of the application for a 40 CFR Part 70 permit and shall include the following information:
(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emission limits and operating limits of 40 CFR 63.1347 and 40 CFR 63.1348 (See Specific Condition **B.8.**);
(2) Corrective actions to be taken when required by paragraph 40 CFR 63.1350(e);
(3) Not applicable; and,
(4) Procedures to be .....

j. Section III. Subsection D. Page 22.: Clinker Receiving/Handling System - Description.

Comment: FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. The emission unit description was revised to reflect this.

Response: See "Response" to A.1.a.

k. Section III. Subsection D. Page 22.: Clinker Receiving/Handling System: Specific Condition D.0.

Comment: Condition D.0. was deleted since the requirement to notify the Department prior to operation of the water spray system (which was proposed in lieu of the Johnston-Marsh or equivalent dust suppression system) would no longer be required. This requirement was added as a condition of using the water spray system instead of the Johnston-Marsh dust suppression system.

Response: Since an initial compliance test shall be required upon the installation of the Johnston-Marsh or equivalent dust suppression system, then the following is changed:

FROM:

D.0. Due to the very intermittent use of this operation, the Department's Southwest District office, specifically the Compliance Section, shall be notified upon any anticipated use of this operation in order to be able to witness the actual operation for compliance purposes.

TO:

D.0. Upon the installation of the Johnston-Marsh or equivalent dust suppression system, the Department's Southwest District office, specifically the Compliance Section, shall be notified to witness the initial actual operation of the control system for compliance purposes.

l. Section III. Subsection D. Page 24. Specific Condition D.14.: Required Number of Test Runs.

Comment: The paragraph was revised to reflect a minor editorial change.

Response: A "paragraph return" was deleted in the 4th line.

m. Section III. Subsection D. Page 24. Specific Condition D.15.: Operating Rate During Testing.

Comment: The page break was removed.

Response: No response is necessary.

n. Section III. Subsection D. Page 25. Specific Condition D.19.: Frequency of Compliance Tests.

Comment: The page break was removed.

Response: No response is necessary.

o. Section III. Subsection D. Page 26. Specific Condition D.19(c).: Frequency of Compliance Tests.

Comment: The sentence was revised to reflect a minor editorial change. The request was to remove a space between "bag" and "house" to read "baghouse" in the 6th line.

Response: The requested change is acceptable and the space was deleted.

p. Section III. Subsection D. Page 28. Specific Condition D.23.

Comment: The rule citation was corrected from 62-206 to 62-204, F.A.C.

Response: The requested change is acceptable and the correction was made in the justification.

q. Section III. Subsection D. Page 30. Specific Condition D.28.(c)20.: Test Reports.

Comment: The page break was removed.

Response: No response is necessary.

r. Section III. Subsection F, Page 32.: Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I with Baghouse - Description.

Comment: In the emission unit description, the plant design rate has been corrected to 83 TPH (or 1992 TPD). The terminology "actual" has been changed to "design" since the flow rates are design flow rates for all emission units. Also "maximum" has been changed to "corresponding to" for all emission units as routine fluctuations in flow could exceed this nominal design rate.

Response: The description has been changed to reflect "83 TPH" in the 1st line. For the flow rates, see "Response" to A.1.d.

s. Section III. Subsection F. Page 33. Specific Condition F.6.b.1.: Methods of Operation - Limitations on Operation to Minimize Dioxin/Furan Formation.

Comment: FCS has deleted "and during times of power plant startup" as compliance was demonstrated under this operating scenario on December 12-13, 2005. There is no reason therefore, to restrict operation under this scenario and condition F.6.b.3. allows for condition F.6.b.1 amendments.

Response: Due to previous testing, the request is acceptable and the following changes will be made.

FROM:

F.6.b. Limitations on Operation to Minimize Dioxin/Furan Formation.

1. For kiln I to operate during times the power plant is not operating and during times of power plant startup, the raw mill down time shall not exceed 10 consecutive hours (i.e. If the raw mill is down for 10 consecutive hours or more, the facility will cease operating kiln I.). Power plant startup is defined as the period beginning with the initiation of fuel firing, either oil or coal, and continuing for 72 consecutive hours.
2. The 10-hour limitation on the raw mill down set forth in Specific Condition **F.6.b.1.**, above, does not apply during startup of the cement plant.

3. The requirements of Specific Condition **F.6.b.1.**, above, may be amended if the permittee provides the Department with other reasonable assurances, acceptable to the Department, that dioxin/furan emission limits will be met during power plant down or in startup mode with the raw mill down.

TO:

F.6.b. Limitations on Operation to Minimize Dioxin/Furan Formation.
1. For kiln I to operate during times the power plant is not operating, the raw mill down time shall not exceed 10 consecutive hours (i.e. If the raw mill is down for 10 consecutive hours or more, the facility will cease operating kiln I.).
2. The 10-hour limitation on the raw mill down set forth in Specific Condition **F.6.b.1.**, above, does not apply during startup of the cement plant.
3. The requirements of Specific Condition **F.6.b.1.**, above, may be amended if the permittee provides the Department with other reasonable assurances, acceptable to the Department, that dioxin/furan emission limits will be met during power plant down with the raw mill down.

t. Section III. Subsection F. Page 34. Specific Condition F.7.: Emission Limits.

Comment: The sentence has been clarified to reflect the correct terminology and rate. The preheater feed rate is a parameter that is measured and this is limited by condition F.3. and corresponds to the kiln feed rate of 127 TPH.

Response: Since the preheater feed rate of 138 TPH is equivalent to the kiln feed rate of 127 TPH and the preheater feed rate is measured, then the requested change is acceptable as follows:

FROM:

F.7. Emission Limits.
a. Cement Plant I: Particulate Matter (PM), Sulfur Dioxide (SO_2) and Nitrogen Oxides (NO_x). Based on a maximum dry feed rate of 127.0 tons/hr to the kiln I and when only the cement plant I is in operation, the allowable pollutant emissions .....

TO:

F.7. Emission Limits.
a. Cement Plant I: Particulate Matter (PM), Sulfur Dioxide (SO_2) and Nitrogen Oxides (NO_x). Based on a maximum preheater feed rate of 138.0 tons/hr to the kiln I and when only the cement plant I is in operation, the allowable pollutant emissions .....

u. Section III. Subsection F. Page 35. Specific Condition F.11.: "On-Specification" Used Oil.

Comment: CPL name was revised.

Response: The comment is acceptable and "Central Power and Lime Plant" has been replaced with "Cement Plant and Power Plant Complex".

v. Section III. Subsection F. Page 37. Specific Condition F.16. Initial and Subsequent Performance Testing.

Comment: The rule citation "63 CFR 63.1345" was corrected to "40 CFR 63.1345".

Response: The comment is acceptable and the correction has been made to the rule citing.

w. Section III. Subsection F. Page 39. Specific Condition F.18.: Sulfur Dioxide.

Comment: This condition was revised to allow the use of test method 6C for SO_2. Method 6C has been used for compliance for years with Department approval.

Response: The comment is acceptable and the test method has been added.

x. Section III. Subsection F. Page 39. Specific Condition F.19.: Nitrogen Oxides.

Comment: This condition was revised to allow the use of test method 7E for NO_x. Method 7E has been used for compliance for years with Department approval.

Response: The comment is acceptable and the test method has been added.

y. Section III. Subsection F. Page 44. Condition F.29.

Comment: The sentence was clarified to state that the materials fed to the kiln are continuously measured to estimate clinker production. Clinker is not directly measured due to its high temperature, rather is estimated using the measured amounts of material fed to the preheater.

Response: Since this a quote of a specific condition in the air construction permit, No. AC27-118674, no change will be made. An air construction permit will have to be issued to change the language.

z. Section III. Subsection F. Pages 44 - 45. Specific Condition F.31.: Nitrogen Oxide.

Comment: This condition states that a mass emissions rate is calculated from a FDEP approved conversion factor in the first sentence and then states in the second sentence that a flow monitor must be used. This condition has been revised to state that a flow monitor or FDEP approved conversion factor can be used. FCS/CPL will be submitting data to support an acceptable conversion factor.

Response: Due to the apparent confusion over the requirement, the requested changes have been made as follows:

FROM:

F.31. Nitrogen Oxide. The owner or operator shall continuously monitor NO_x concentrations in the stack gases in the CP (cement and power) main plant stack, and convert the same to a mass emission rate (lbs/hr on a 1-hour average) using a FDEP approved conversion factor. A flow monitor and NO_x emissions monitor (EPA-approved or equivalent) shall be operated in the CP main plant stack to continuously measure the stack gas flow rate and NO_x concentration. The monitors shall be maintained and calibrated periodically to insure adequate data. The data shall be recorded on an hourly basis and used in the determination of NO_x stack emissions. The calibration of the continuous monitoring system for NO_x shall be in accordance with 40 CFR 60, Appendix B, Performance Specification 2.

TO:

F.31. Nitrogen Oxide. The owner or operator shall continuously monitor NO_x concentrations in the stack gases in the CP (cement and power) main plant stack, and convert the same to a mass emission rate (lbs/hr on a 1-hour average) using a FDEP approved conversion factor or a flow monitor. The stack gas flow determined by the approved conversion factor or flow monitor and data from the NO_x emissions monitor (EPA-approved or equivalent) operating in the CP main plant stack shall be used to continuously determine the stack gas flow rate and NO_x concentration. The monitors shall be maintained and calibrated periodically to insure adequate data. The data shall be recorded on an hourly basis and used in the determination of NO_x stack emissions. The calibration of the continuous monitoring system for NO_x shall be in accordance with 40 CFR 60, Appendix B, Performance Specification 2.

aa. Section III. Subsection F. Page 45. Specific Condition F.32.: Sulfur Dioxide and Opacity.

Comment: A statement was added to allow the use of a flow monitor or a FDEP approved conversion factor. FCS requests to have the references to 40 CFR 60.45 and to 40 CFR 60.13 removed. This is because 40 CFR 60.45 does not apply to cement plants and the NESHAP supersedes the NSPS requirement of 40 CFR 60.13. The reference to 40 CFR 63.1350 is already cited in this condition.

Response: It is acceptable to allow for the use of a FDEP approved conversion factor or a flow monitor along with the data from the CEMS to convert to a mass emission rate for determining compliance with the permit limit. Since the U.S. EPA, Region 4 issued the original PSD permits, PSD-FL-090 and -091, their usage of any NSPS citing within the permits is just for direction and clarification, because a letter from Mr. James T. Wilburn of the U.S. EPA, Region 4, dated January 27, 1983, established that the power boiler was not subject to the NSPS provisions at the time it was authorized to be installed (a "Permitting Note" will be added to address this issue). The term "certification" will be changed to "recertification" because the monitoring device would need to be recertified if a major component or the monitor itself is replaced. Therefore, the following changes have been made and/or added:

FROM:

F.32. Sulfur Dioxide and Opacity. The permittee shall operate and maintain continuous monitoring devices for the power boiler/cement plant I main stack exhaust for sulfur dioxide and opacity to demonstrate compliance

with the pound per hour SO_2 emissions limits and the visible emissions limits, respectively, in Specific Conditions **F.7.** and **F.8.**, respectively. The monitoring devices shall meet the applicable requirements of Chapter 62-297, F.A.C., and 40 CFR 60.45 and 40 CFR 60.13., including certification of each device. The permittee shall provide the Department with 30 days notice on each certification.
[PA 82-17 & PA 82-17K; 40 CFR 60, Appendix B; Rule 62-297.520, F.A.C.; PSD-FL-090; and, 40 CFR 63.1350(c)(1)]

TO:

F.32. Sulfur Dioxide and Opacity. The permittee shall operate and maintain continuous monitoring devices for the power boiler/cement plant I main stack exhaust for sulfur dioxide and opacity to demonstrate compliance with the pound per hour SO_2 emissions limits and the visible emissions limits, respectively, in Specific Conditions **F.7.** and **F.8.**, respectively. The owner or operator shall continuously monitor SO_2 concentrations in the stack gases in the CP (cement and power) main plant stack, and convert the same to a mass emissions rate (lbs/hr) using a FDEP approved conversion factor or a flow monitor. The monitoring devices shall meet the applicable requirements of Chapter 62-297, F.A.C., and 40 CFR 60.45 and 40 CFR 60.13, including certification of each device. The permittee shall provide the Department with 30 days notice on each recertification.

{Permitting Note: Based on a letter from Mr. James T. Wilburn of the U.S. EPA, Region 4, dated January 27, 1983, the power boiler was not subject to the NSPS provisions at the time it was authorized to be installed; and, the use of any NSPS rule citing is just for clarification and direction for monitoring requirements.}

[PA 82-17 & PA 82-17K; 40 CFR 60, Appendices B and F; Rule 62-297.520, F.A.C.; PSD-FL-090; and, 40 CFR 63.1350(c)(1)]

bb. Section III. Subsection F. Page 46. Specific Condition F.39.: Notification Requirements.

Comment: The page break was deleted.

Response: No response is necessary.

cc. Section III. Subsection F. Page 51. Emission Unit Descriptions.

Comment: The terminology "actual" has been changed to "nominal" due to the routine fluctuation in the flow rates.

Response: See "Response" to A.1.d.

dd. Section III. Subsection I. Page 58. Power Plant Boiler – Description.

Comment: A minor typographical error was corrected in the emission unit description.

Response: The comment is acceptable and "300 °F" was changed to "300 °F".

ee. Section III. Subsection I. Page 61. Specific Condition I.7.b.: Particulate Matter (PM/PM_{10})

Comment: A minor typographical error was corrected.

Response: The comment is acceptable and "PM/PM10" was changed to "PM/PM_{10}".

ff. Section II. Subsection I, Page 61, Condition I.19.

Comment: This condition was revised to allow the use of test method 6C in addition to test method 6 for SO_2. Method 6C has been used for compliance for years with Department approval.

Response: See "Response" to A.1.w.

gg. Section III. Subsection I. Page 61. Specific Conditions I.21, I.22, and I.24.: Total Fluorides, Sulfuric Acid Mist and Mercury, respectively.

Comment: The reference to 40 CFR 60.8 was replaced with 40 CFR 60, Appendix A, since the NSPS does not apply. 40 CFR 60, Appendix A provides the technical requirements without a non-applicable rule reference.

Response: Since the U.S. EPA, Region 4 issued the original PSD permits, PSD-FL-090 and -091, their usage of the General Provisions in 40 CFR 60, Subpart A, to establish some type of testing protocol will not be edited. Also, their usage of any NSPS citing within the permits is just for direction and clarification, because a letter from Mr. James T. Wilburn of the U.S. EPA, Region 4, dated January 27, 1983, established that the power boiler was not subject to the NSPS provisions at the time it was authorized to be installed. Therefore, no change will be made.

hh. Section III. Subsection I. Page 61. Specific Condition I.26.

Comment: The rule citation for 40 CFR 60.46 was removed since it does not apply.

Response: Since the U.S. EPA, Region 4 issued the original PSD permits, PSD-FL-090 and -091, their usage of any NSPS citing within the permits is just for direction and clarification, because a letter from Mr. James T. Wilburn of the U.S. EPA, Region 4, dated January 27, 1983, established that the power boiler was not subject to the NSPS provisions at the time it was authorized to be installed. Therefore, no change will be made.

ii. Section II. Subsection I, Page 62, Condition I.29.: Required Number of Test Runs.

Comment: A minor typographical error was corrected.

Response: A "paragraph return" was deleted in the 11th line.

jj. Section III. Subsection I. Pages 63-64. Specific Condition I.34.: Frequency of Compliance Tests.

Comment: The numbering of this condition was revised.

Response: The specific condition reflects the applicable regulations as they are numbered in the rule. Therefore, no change will be made.

kk. Section III. Subsection I. Page 65. Condition I.41.

Comment: A statement was added to allow the use of a flow monitor or a FDEP approved conversion factor as previously described.

Although the permit contained a requirement to comply with the "applicable" requirements of 40 CFR 60.45 and 60.13, this requirement has proven to be a source of confusion because the power plant is not subject to the New Source Performance Standards (see PA 82-17, June 13, 1983 at 29; BACT Determination, May 20, 1983 at 1). The original reference to these provisions was thus in error. Moreover, as these provisions in fact are not applicable to the plant, the vague reference to the "applicable" parts of these sections creates uncertainty as to what the facility is required to do on a going forward basis with respect to the monitoring equipment. It has been the facility's understanding, based on the history of the facility and prior communications with the FDEP, that the intent of this provision was to require the facility to comply with applicable Florida regulations as well as the performance standards set forth in 40 CFR Part 60 Appendix B. Accordingly, FCS requests, in the interest of clarifying Section I.41., that the reference to the applicable requirements of 40 CFR 60.45 and 60.13 be deleted and that Section I.41. be revised to make it clear that the monitoring devices meet the applicable requirements of Chapter 62-297, F.A.C. and 40 CFR Part 60 Appendix B.

The statement "The permittee shall provide the Department with 30 days notice on each certification." has been removed since FCS provided the required initial certification for SO_2 and opacity in 1991.

Clarification has been added to this permit condition for the certification of each device and to note that this emission unit is not subject to the NSPS.

Response: It is acceptable to allow for the use of a FDEP approved conversion factor or a flow monitor along with the data from the CEMS to convert to a mass emission rate for determining compliance with the permit limit. Since the U.S. EPA, Region 4 issued the original PSD permits, PSD-FL-090 and -091, their usage of any NSPS citing within the permits is just for direction and clarification, because a letter from Mr. James T. Wilburn of the U.S. EPA, Region 4, dated January 27, 1983, established that the power boiler was not subject to the NSPS provisions at the time it was authorized to be installed (a "Permitting Note" will be added to address this issue). Regarding notification of the certification of the continuous monitoring devices, the term "certification" will be changed to "recertification" because the monitoring device would need to be recertified if a major component or the monitor itself is replaced. Therefore, the following changes have been made and/or added:

FROM:

I.41. The permittee shall operate and maintain continuous monitoring devices for the power boiler/cement plant I main stack exhaust for sulfur dioxide and opacity to demonstrate compliance with the pound per hour SO_2 emissions limits and the visible emissions limits, respectively, in Specific Conditions **I.8.** and **I.6.**, respectively. The monitoring devices shall meet the applicable requirements of Chapter 62-297, F.A.C., 40 CFR 60.45, and 40 CFR 60.13., including certification of each device. The permittee shall provide the Department with 30 days notice on each certification. See Specific Condition **F.32.**
[PA 82-17 and PA 82-17K; Rule 62-297.520, F.A.C.; and, PSD-FL-090]

TO:

I.41. The permittee shall operate and maintain continuous monitoring devices for the power boiler/cement plant I main stack exhaust for sulfur dioxide and opacity to demonstrate compliance with the pound per hour SO_2 emissions limits and the visible emissions limits, respectively, in Specific Conditions **I.8.** and **I.6.**, respectively. The owner or operator shall continuously monitor SO_2 concentrations in the stack gases in the CP (cement and power) main plant stack, and convert the same to a mass emissions rate (lbs/hr) using a FDEP approved conversion factor or a flow monitor. The monitoring devices shall meet the applicable requirements of Chapter 62-297, F.A.C., and 40 CFR 60.45 and 40 CFR 60.13, including certification of each device. The permittee shall provide the Department with 30 days notice on each recertification. See Specific Condition **F.32.**

{Permitting Note: Based on a letter from Mr. James T. Wilburn of the U.S. EPA, Region 4, dated January 27, 1983, the power boiler was not subject to the NSPS provisions at the time it was authorized to be installed; and, the use of any NSPS rule citing is just for clarification and direction for monitoring requirements.}

[PA 82-17 and PA 82-17K; Rule 62-297.520, F.A.C.; and, PSD-FL-090]

2. Statement of Basis

a. Page 1. 2nd Paragraph. 6th Sentence.

Comment: FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. This sentence was revised to reflect this installation.

Response: The comment is acceptable and the following change will be made:

FROM:

……. controlled using some type of wetting agent; and, other types of particulate matter control may be required depending on how the system is actually operated. Water sprays …….

TO:
……. controlled using a Johnston-Marsh or equivalent dust suppression system. Water sprays …….

b. Pages 1-3: Brooksville Cement Plant.

Comment: The terminology "actual" has been changed to "nominal" due to the routine fluctuation in the flow rates and the corresponding flow rate at dry standard conditions have been placed in parentheses for all the affected emission units.

Response: The comments are acceptable and the following example will show how all of the flow rate values will be changed:

FROM:

Filter Dust Bin with Baghouse. This emissions unit is a storage bin for fines (dust). The particulate matter (PM) emissions from the materials being transferred are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The actual volumetric flow rate is 6,800 acfm; and, the maximum dry standard flow rate is 6,686 dscfm.

TO:

Filter Dust Bin with Baghouse. This emissions unit is a storage bin for fines (dust). The particulate matter (PM) emissions from the materials being transferred are controlled by a low temperature baghouse fabric filter system. The stack height is 125 feet, with an exit diameter of 2.0 feet and an exit temperature of 77 °F. The nominal volumetric flow rate is 6,800 acfm (6,686 dscfm).

c. Pages 2 & 3: 4th, 5th and 9th Paragraphs (Page 2) and 3rd Paragraph (Page 3).

Comment: The emission unit descriptions have been clarified for EU 009 (Clinker Cooler Discharge with Baghouse), EU 010 (Clinker Storage Silos with Baghouse), EU 014 (Cement Storage Silos #1 and #2 A-Side Discharge System with Baghouse), and EU 021(Cement Storage Silos #1, #2, and #3 B-Side Discharge System with Baghouse).

Response: The comment is acceptable to clarify the emission unit descriptions and the following changes will be made:

(1) EU 009 (Page 2)

FROM:

o Clinker Cooler Discharge to Deep Bucket Conveyor with Baghouse

TO:

o Clinker Cooler Discharge with Baghouse

(2) EU 010 (Page 2)

FROM:

o Clinker Storage Silo and Finish Mill Storage Silo with Baghouse

TO:

o Clinker Storage Silos with Baghouse

(3) EU 014 (Page 2)

FROM:

o Cement Storage Silos #1 & #2 Discharge System with Baghouse

TO:

o A-Side Cement Storage Silos #1 & #2 Discharge System with Baghouse

(4) EU 021 (Page 3)

FROM:

o Cement Storage Silo #3 Discharge System with Baghouse

TO:

o B-Side Cement Storage Silos #1, #2 & #3 Discharge System with Baghouse

d. Page 3. 7th Paragraph. 2nd Sentence.

Comment: FCS plans to install a Johnston-Marsh or equivalent dust suppression system to control fugitive particulate matter emissions from the Clinker Receiving/Handling system. This sentence was revised to reflect this installation.

Response: The comment is acceptable and the following change will be made:

FROM:

……. controlled by the use of some type of wetting agent; and, other types of particulate matter control may be required depending on how the system is actually operated. This emissions unit …….

TO:

.....controlled by the use of a Johnston-Marsh or equivalent dust suppression system. This emissions unit .....

e. Page 3. 8th Paragraph. 1st Sentence.: Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I with Baghouse - Description.

Comment: In the emission unit description, the plant design rate has been corrected to 83 TPH (or 1992 TPD).

Response: The description has been changed to reflect "83 TPH" in the 1st line.

B. E-mail received March 16, 2006. (clarification)

1. See comment and response to A.1.b., above.
2. See comments and responses to A.1.w. and A.1.x., above.

C. E-mail received March 17, 2006. (clarification)

1. See comment and response to A.1.b., above.
2. See comment and response to A.1.y., above.
3. See comment and response to A.1.aa., above.
4. See comment and response to A.1.r., above.
5. See comments and responses to A.1.w., A.1.x. and A.1.ff., above.
6. See comments and responses to A.1.aa. and A.1.kk., above.

III. Conclusion.

There were no comments received during the Public Notice period; however, comments were submitted after the Public Notice period ended. Even so, the Department has addressed those comments in this PROPOSED Determination, and the changes that have been made are not considered to be significant such that another Public Notice is required. Therefore, the permitting authority hereby issues the PROPOSED Permit, with the changes noted above.