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NOV 29 1993

DEPT. OF ENV. PROTECTION
WEST PALM BEACH

Print your name, address and ZIP Code here

F.D.E.P., SOUTHEAST DISTRICT

P.O. BOX 15425

WEST PALM BEACH FL 33416

Paul W.

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Mr. James S. Jenkins, III
Rinker Materials Corp.
P.O. Box 24635
West Palm Beach, FL 33416-

4a. Article Number

P 893 810 887

4b. Service Type

- | | |
|---|---|
| <input type="checkbox"/> Registered | <input type="checkbox"/> Insured |
| <input checked="" type="checkbox"/> Certified | <input type="checkbox"/> COD |
| <input type="checkbox"/> Express Mail | <input type="checkbox"/> Return Receipt for Merchandise |

7. Date of Delivery

NOV 23 1993

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

APPLICATION TRACKING SYSTEM

11/22/93

APPL NO:240731

APPL RECVD:11/09/93 TYPE CODE:50 SUBCODE:17 LAST UPDATE:11/22/93

DER OFFICE RECVD:WPB DER OFFICE TRANSFER TO:___ APPLICATION COMPLETE:11/09/93

DER PROCESSOR:WIERZBICKI, PAUL

APPL STATUS:GP DATE:11/22/93 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUED/GENERAL)

RELIEF:___ (SSAC/EXEMPTIONS/VARIANCE)

(Y/N) N MANUAL TRACKING

DISTRICT:50 COUNTY:13

(Y/N) N DGC HEARING REQUESTED

LAT/LONG:25.46.48/80.25.10

(Y/N) N PUBLIC NOTICE REQD?

BASIN-SEGMENT:___

(Y/N) N GOV BODY LOCAL APPROVAL REQD?

COE #:

(Y/N) Y LETTER OF INTENT REQD? _ (I/ISSUE D/DENY)

ALT#:GM--5013P03669

PROJECT SOURCE NAME:RINKER/STATIONARY SOIL THERMAL

STREET:1200 NW 137TH AVE.

CITY:MIAMI

STATE:FL

ZIP:33182

PHONE:305-221-7645

APPLICATION NAME:JAMES S. JENKINS III,VP CEMENT OPER

STREET:P.O.BOX 24635

CITY:WEST PALM BEACH

STATE:FL

ZIP:33416

PHONE:___-___-___

AGENT NAME:DONALD BEERS

STREET:SAME

CITY:_____

STATE:___

ZIP:_____

PHONE:407-820-8346

FEE #1 DATE PAID:11/09/93

AMOUNT PAID:00500

RECEIPT NUMBER:00220903

B DATE APPLICANT INFORMED OF NEED FOR PUBLIC NOTICE - - - - -

C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - -

D DATE DER REQ. COMMENTS FROM GOV. BODY FOR LOCAL APP. - - - - -

E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - -

F DATE LAST 45 DAY LETTER WAS SENT - - - - -

G DATE FIELD REPORT WAS REQ--REC - - - - -

H DATE DNR REVIEW WAS COMPLETED - - - - -

I DATE APPLICATION WAS COMPLETE - - - - -

11/09/93

J DATE GOVERNING BODY PROVIDED COMMENTS OR OBJECTIONS - - - - -

K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - -

L DATE PUBLIC NOTICE WAS SENT TO APPLICANT - - - - -

M DATE PROOF OF PUBLICATION OF PUBLIC NOTICE RECEIVED - - - - -

N WAIVER DATE BEGIN--END (DAY 90) - - - - -

COMMENTS:EXPIRATION DATE 04/04/96

PATS02 240731 APPLICATION TRACKING SYSTEM STANDARD INFORMATION 11/10/93
APPL RECVD:11/09/93 TYPE CODE:SO SUBCODE:17 240731 LAST UPDATE:11/09/93
DER OFFICE RECVD:WPB DER OFFICE TRANSFER TO:___ APPLICATION COMPLETE:00/00/00
DER PROCESSOR:WIERZBICKI, PAUL
APPL STATUS:AC DATE:11/09/93 (ACTIVE/DENIED/WITHDRAWN/EXEMPT/ISSUE/GENERAL=GP)
RELIEF:___ (SSAC=SS/EXEMPTIONS=EX/VARIANCE=VA)
(Y/N) N MANUAL TRACKING DISTRICT:50 COUNTY:13
(Y/N) N OGC HEARING REQUESTED LAT/LONG:25.46.48/80.25.10
(Y/N) N PUBLIC NOTICE REQD? BASIN-SEGMENT:___
(Y/N) N GOV BODY LOCAL APPROVAL REQD? COE #:_____
(Y/N) Y LETTER OF INTENT REQD? _ (I/ISSUE D/DENY) ALT#:____-

PROJECT SOURCE NAME:RINKER/STATIONARY SOIL THERMAL
STREET:1200 NW 137TH AVE. CITY:MIAMI
STATE:FL ZIP:33182 PHONE:305-221-7645
APPLICATION NAME:JAMES S. JENKINS III,VP CEMENT OPER
STREET:P.O.BOX 24635 CITY:WEST PALM BEACH
STATE:FL ZIP:33416 PHONE:_____
AGENT NAME:DONALD BEERS
STREET:SAME CITY:_____
STATE:___ ZIP:_____ PHONE:407-820-8346
FEE #1 DATE PAID:11/09/93 AMOUNT PAID:00500 RECEIPT NUMBER:00220903

TAB TO HERE: _

PATS03 240731 APPLICATION TRACKING SYSTEM CLOCK INFORMATION 11/10/93
APPLICATION NUMBER:240731 APPLICATION TYPE:SO
A DATE APPLICATION WAS RECEIVED - - - - - 11/09/93

C DATE DER SENT DNR APPLICATION/SENT DNR INTENT - - - - - __/__/__--__/__/__

E DATE #1 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #2 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #3 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #4 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #5 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

E DATE #6 ADDITIONAL INFO REQ--REC FROM APPLICANT - - - - - __/__/__--__/__/__

F DATE LAST 45 DAY LETTER WAS SENT - - - - - __/__/__

G DATE FIELD REPORT WAS REQ--REC - - - - - __/__/__--__/__/__

H DATE DNR REVIEW WAS COMPLETED - - - - - __/__/__

I DATE APPLICATION WAS COMPLETE - - - - - __/__/__

K DATE NOTICE OF INTENT WAS SENT--REC TO APPLICANT - - - - - __/__/__--__/__/__

N WAIVER BEGIN DATE--END DATE (DAY 90) - - - - - __/__/__--__/__/__

TAB TO HERE: _

SOUTHEAST FLORIDA DISTRICT PERMIT PROCESSING WORKSHEET

LOGGING:

NAME OF PROJECT Rinker/Stationary Soil Thermal
PROJECT LOG NO. 5013-240731 COUNTY Dade
DATE APPLICATION RECEIVED 11/9/93 30-DAY (HW 60-DAY DATE 12/7/93
AMOUNT OF FEE PAID \$500.00 COPIES OF PLANS _____
COPIES OF APPLICATION 3 COPIES OF SPECIFICATIONS _____
COPIES TO: CORPS _____; LOCAL PROGRAM _____; Tallahassee _____; DNR _____; OTHER _____

PERMIT REVIEW:

PERMIT ASSIGNED TO Wierzbicki, P. AMOUNT OF FEE REQUIRED \$ _____
DISCHARGE TO OR LOCATED IN AN AQUATIC PRESERVE: YES _____ NO _____ N/A _____

PERMIT STATUS AND CHRONOLOGY:

DATE	REVIEWER'S INITIALS	COMMENTS
		(continued on reverse side)

FIELD INSPECTION BY: _____ DATE: _____; N/A _____
WATER MANAGEMENT COMMENTS (DATE) _____; N/A _____
LOCAL PROGRAM APPROVAL (DATE) _____; N/A _____
GPSI, APIS, OR PWS UPDATE DRAFTED: YES _____; N/A _____
PUBLIC NOTICE LETTER ISSUED/PUBLISHED (DATES) _____/_____; N/A _____
APPLICATION COMPLETION DATE _____ > DEFAULT DATE _____
>> D.A.S. 90+ DAYS INACTIVITY AUTHORIZATION: _____ OK _____ DENY <<
COMMENTS: _____

PERMIT, EXEMPTION, DENIAL DRAFTED BY: _____ DATE: _____
INTENT: PROGRAM HEAD _____ PROGRAM ADM. _____
FINAL DRAFT REVIEWED BY: _____ DATE: _____
FINAL DRAFT APPROVED BY: _____ DATE: _____

FINAL PROCESSING:

DISTRIBUTION BY: DEIDRA DATE: 11/22/93
PATS UPDATED BY: Candie Sutherland DATE: 11/24/93
GPSI, APIS, OR DWS UPDATED BY: C. Sutherland DATE: 11/24/93
WORD PROCESSOR: _____

Mining blasts away at Glades' future

■ The companies tear up vast acres of wetlands and leave sterile "lakes" behind. They want more.

By CRAIG PITTMAN
Times Staff Writer

MIAMI — The dump trucks rumble out of the CSR Rinker mine, swirling a fine gray dust in the air. Just as the dust starts to settle, another truck full of rocks comes barreling past and stirs it up again.

Every day, politically powerful mining companies like Rinker blast tons of chalky white limestone out of the ground in Miami-Dade County to feed Florida's insatiable appetite for concrete.

To excavate the rock, the miners have torn up 11,000 acres of Everglades wetlands. They have destroyed the fertile swamps, replacing them with comparatively

sterile "lakes" as square as a stamp.

And now they want more — 21,000 acres more. Whether they get it is a decision with consequences both for Florida's economy and for plans to restore the Everglades.

The mining companies justify the expansion by pointing out that they supply half the limestone used for construction in Florida. They say "there is no practicable alternative" for building the state's roads, sidewalks, sewers, schools, stores and houses.

The mining will drive out alligators, deer and endangered wood storks that live in the swamps, according to a county study. Digging the deep quarries disrupts the flow of the River of Grass, according to the National Park Service. And county utilities officials fear that water pooling in the quarries could wind up

Please see MINING 8A

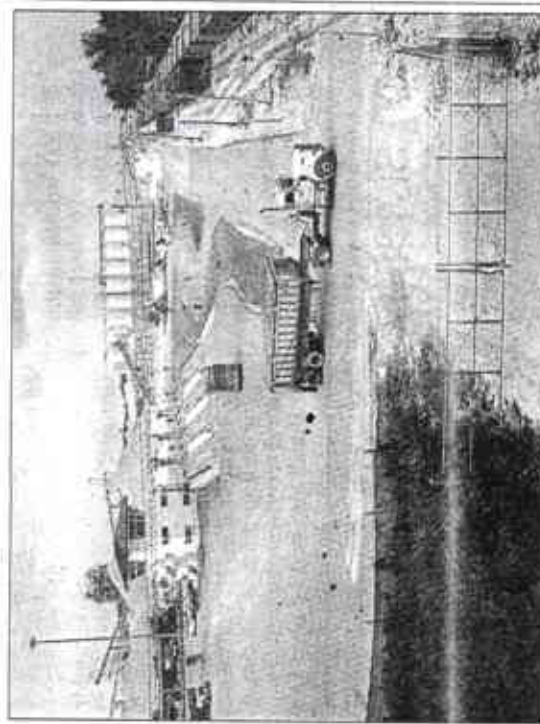
AIRPORT SUES FOR CLEANUP: Miami-Dade County is suing 17 companies for \$450-million being spent to clean up toxic chemicals it says businesses and agencies dumped near Miami International Airport. The defendants, which include American Airlines, Delta Air Lines and firemaker B.F. Goodrich, contaminated the county's only drinking water source by discharging materials into canals, storm drains and the ground, the lawsuit said. The complaint is the largest environmental lawsuit ever in the state.

File → Rinker



Because the water-filled quarries left in the wake of mining resemble lakes, the region in Miami-Dade County has been dubbed the Lake Belt.

South Florida Water Management District



South Florida Water Management District

The mining companies justify an expansion by pointing out that they supply half the limestone used for construction in Florida.

Mining from 1A

contaminating drinking supplies for more than 1-million people.

But federal and state officials insist the mining industry is going to help save the Everglades and boost South Florida's water supply.

Last year Congress and the Legislature approved an \$8-billion plan to restore the ailing Everglades to a semblance of its former glory and provide enough water for South Florida's population to double.

One of the most expensive parts of that plan, with a price tag of \$1-billion, calls for allowing miners to continue destroying wetlands for several decades. Then the 90-foot-deep quarries would be combined into massive reservoirs to store water for release into the Everglades or for use by utility customers.

Even the architects of the reservoir plan concede it may not work. The porous limestone walls of the quarries tend to let the contents seep out like a bathtub full of holes. So far no one has figured out how to keep the water in.

Yet those reservoirs "are pretty well a key ingredient in the Everglades plan," said Albert Townsend, director of real estate and environmental services for Tarmac Florida, one of the mining companies. Scott Benyon, a CSR Rinker vice president, calls it "a real win-win for everybody."

Because the water-filled quarries resemble lakes, the 89-square-mile mining area has been dubbed the Lake Belt. That term "is a nice sounding word to describe the destruction of thousands of acres of Everglades wetlands to create rock mining pits," the environmental group Friends of the Everglades complained in a letter to Congress.

The proposal to destroy part of the Everglades to save the rest has not been without controversy. Friends of the Everglades, the Sierra Club and the Natural Resources Defense Council have notified federal officials they intend to sue.

Even other federal agencies have balked at allowing more Lake Belt mining. Department of the Interior officials say the miners are destroying "the last remnant" of a type of marsh "critical to the proper functioning of the Everglades ecosystem."

There is no way to make up for such a loss, they said, and the deep holes left by the miners are "biologically unproductive and functionally impaired."

Not true, according to Townsend: "Sometimes our employees catch some nice bass."

■ ■ ■
The Lake Belt's limestone was formed in the prehistoric Pleistocene era. The soapy rock starts just beneath the swampy surface and extends down about 100 feet. Mining companies began blasting it out in the 1950s, and now three of the biggest rock quarries in the country are in the Lake Belt.

Between the 1960s and the 1980s, 10 mining companies amassed more than 26,000 acres just northeast of Everglades National Park. The two largest companies are Tarmac, owned by a Greek multinational corporation, and CSR Rinker, which is part of an Australian conglomerate.

Every year the mines produce about 40-million tons of sand and stone, which is used in cement, concrete and asphalt. Lake Belt limestone built Orlando's theme parks and the Kennedy Space Center. Despite the slipping American economy, the mining business is booming, Townsend said, primarily because the state is building a lot of highways.

The mining destroys about 400 acres of wetlands a year. Normally when anyone destroys a wetland,

Glades mining

Since the 1950s, mining companies have been blasting limestone out of Everglades wetlands. Because the quarries fill with water, the area has been dubbed "the Lake Belt." Now concerns have been raised about the mining's effect on Everglades restoration, wildlife and a wellfield that serves 1-million people.



Times art

the law requires replacing it with double or even triple the acreage. But government officials have never made Lake Belt miners replace what they destroy.

Federal regulators have required only that the miners leave a shallow lip 100 feet wide around the edge of each quarry. These 3-foot-deep shelves are supposed to mimic wetlands in attracting wildlife.

If the quarries become reservoirs for Everglades restoration, the water will fluctuate so much those shelves will be left dry and thus be worthless, according to the Environmental Protection Agency.

As it is, the shelves do not come close to making up for what is lost. Rinker has mined more than 2,500 acres but has built just 100 acres of shelves, plus one 38-acre wetland in an area that could not be mined.

According to a 1996 county study, the shelves as built simply do not work. The study suggested reconfiguring them to better mimic wetlands, but county officials say miners have not tried those techniques.

"The bottom line is to maximize rock-mining at the expense of any sort of environmental mitigation," said George Dalrymple, the consultant who did the study for the county.

Since the 1980s the Legislature has repeatedly exempted the miners from the state's rules protecting wetlands. As the final exemption neared expiration, lawmakers decided to charge the companies 5 cents per ton of rock to pay for the damage.

"That money will be more than sufficient to offset any negative impacts we have," Townsend said.

The fee is based on a calculation of the amount of money required to replace each acre of Lake Belt wetland that was destroyed with 2½ acres of new or restored wetlands. That is half what's required of other developers, say Interior Department officials.

In practice the fee works out to less than \$15,000 an acre, Dalrymple said, even though Miami-Dade developers usually are forced to pay \$45,000 an acre to replace wetlands.

"Now that's a sweetheart deal if ever there was one," he said.

The miners contend the wetlands they are wiping out are hardly pristine. Exotic melaleuca trees have "substantially and significantly invaded" it, Benyon said.

Yet Dalrymple's study found that Everglades wildlife was still there. Even endangered wood storks still used it.

National Park Service experts have pointed out that there are ways to remove melaleuca that do not require blowing up the swamp where it grows.

■ ■ ■

The future of Lake Belt mining is now at stake. The miners' federal and county permits for destroying wetlands are expiring. And for the first time they will be required to get state permits.

The 10 companies together have sought federal permits to mine 21,000 acres over the next 50 years. Initially the Corps of Engineers, which denied a Lake Belt mining permit in the 1980s and now may be ordered by a federal court to pay for effectively taking the property, was going along with that request.

But after environmental groups threatened to sue last fall, the Corps backed off. For now Corps officials are considering permits for mining just 4,000 acres over 10 years, with the rest to come later.

One crucial question the Corps hopes to answer in the next decade is whether the quarries might contaminate the water supply. Near the center of the Lake Belt is the Northwest Wellfield, which serves more than 1-million people.

Federal studies show that the water in the quarries is of "stupendous quality," said Benyon, the CSR Rinker vice president. But county utility officials fear more extensive mining could leave behind water tainted with deadly microorganisms such as cryptosporidium, which in 1993 got into Milwaukee's water supply and killed more than 100 people. Mining officials say they will pay for extensive monitoring.

Although no new permits have been issued, the mining has not stopped. Last month several government officials visited one of the wetland areas Tarmac wants to mine. When they got there, they found the swamp already gone.

"The site was completely dug out," said Dalrymple, who was along on the site visit.

Four months ago, county zoning officials discovered that Rinker had mined an area that was supposed to be kept intact. When they asked the county's environmental watchdogs to punish Rinker, nothing happened. An internal county memo notes that one environmental official discouraged the zoning department from even putting anything in writing.

"To my mind, this is the best example of why you can't trust the industry," said Michael Pizzi, who leads a group suing the miners. "And it shows that the people who

are supposed to be regulating the mining industry have abdicated their responsibilities."

Pizzi's group, Citizens Against Blasting, consists of homeowners who think vibrations from blasting at the mines have cracked their homes. The companies say shoddy construction is to blame.

Nevertheless, last year mining officials sat down with homeowners and county officials to form a task force to limit blasting. Before the County Commission could act on the task force recommendations, though, the Legislature abruptly took away the county's power to regulate blasting.

Benyon, who represented Rinker on the task force, said the mining companies quietly pushed for the legislative change because they were tired of trying to appease grandstanding county officials. He said he did not warn the rest of the task force about the change because "you never know if you're going to be successful or not."

To Pizzi this shows the miners' tremendous clout. They are generous contributors to politicians in both Congress and the Legislature. Since 1997, Rinker's parent company has donated more than \$130,000 to candidates in state races, including more than \$44,000 to the state GOP and \$13,000 to Florida's Democratic Party.

■ ■ ■

For their critics, the mining companies have one answer: Florida cannot afford to shut us down. If any government agency were to deny the miners a permit, "the state of Florida would come to a halt," Townsend contended. "The economic engine for everything would come to a halt."

But EPA officials and environmental groups contend there are economically viable alternatives. Although Lake Belt limestone is far cheaper than any produced elsewhere, half of the state's limestone already comes from other sources besides the Lake Belt, they pointed out. Some states import the rock they need.

Last year Florida imported more than 4-million tons of cement from other countries, according to William Toal, chief economist of the Portland Cement Association, a national trade group. Right now, the imports are "quite a bit cheaper, even with the transportation costs added in, because the Asian economy is in quite a tailspin."

EPA officials have asked why mining cannot be limited to part of the Lake Belt that has already been excavated, rather than allowing it to expand.

That would provide enough rock for the next 15 years, EPA officials said. Perhaps that would be enough time, they suggested, to allow Florida to find another source of limestone that does not require blowing big holes in the Everglades.

— Times researcher Caryn Baird contributed to this report.



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

NOV. 22 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James S. Jenkins, III
Rinker Materials Corporation
P.O. Box 24635
West Palm Beach, FL 33416

GMS I.D. No.: 5013P03669
General Permit No.: S013-195017
County: Dade
Project: Construct/Operate a Soil
Thermal Treatment Facility
Expiration Date: April 4, 1996

Dear Mr. Jenkins,

This letter acknowledges receipt of your notice of intent requesting modification to the General Permit referenced above. Based upon the representation submitted to the Department, the modifications appear compatible with the operation of the soil thermal treatment facility located at 1200 NW 137th Avenue, Miami, Dade County, FL 33182.

This facility shall be operated in accordance with the applicable paragraphs set forth in Florida Administrative Code Rule 17-775.

This General Permit is subject to the General Conditions of Florida Administrative Code Rule 17-4.510 through 17-4.540.

If you need further information, please contact Mr. Paul Wierzbicki at 407-433-2650, or 904-488-1320 (24 hours) in the event of an emergency.

Sincerely,

A handwritten signature in cursive script that reads "Vivek Kamath".

Vivek Kamath, P.E.
Waste Programs Administrator

cc: John Ruddell/BWC, Tallahassee
Tom Conrardy/BWC, Tallahassee
Zoe Kulakowski/BWC, Tallahassee
Isadore Goldman/Air Section, West Palm Beach
Mike Vardeman/Rinker, Miami
Bob Johns/DERM, Miami
Barbara Jones/Admin, West Palm Beach

WPB DEP File



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

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Sincerely,

*904/488-1320, in the event of an emergency.
(24 hours)*

Vivek Kamath, P.E.
Waste Programs Administrator

cc: John Ruddell/BWC, Tallahassee
Tom Conrardy/BWC, Tallahassee
Zoe Kulakowski/BWC, Tallahassee
Isadore Goldman/Air Section, West Palm Beach
Mike Vardeman/Rinker, Miami
Bob Johns/DERM, Miami
WPB DEP File

(b.c. to Barbara)

ENFORCEMENT TRACKING	
DRAFT _____	
Initial	Date
<i>7/19/93</i>	<i>7/19/93</i>
<i>PAW</i>	<i>11/22/93</i>
<i>Chp made from</i>	<i>11/22/93</i>

*Coord. with VK
before sending
Wbm
11/22/93*

I N T E R O F F I C E M E M O R A N D U M

Date: 22-Nov-1993 02:26pm GMT
From: Lee Martin WPB
MARTIN_L
Dept: Southeast District Office
Tel No: 407/433-2650
SUNCOM: 232-2650

TO: Tom Conrardy TAL (CONRARDY_T @ A1 @ DER)
CC: Paul Wierzbicki WPB (WIERZBICKI_P)
CC: Vivek Kamath WPB (KAMATH_V)

Subject: Rinker Materials STTF Permit SO13-195017 Modification

Thanks for your time and comments on the referenced modification. The following responses, matching your comments, identifies our planned actions:

1. Apparently a typo since the description identifies the proper incinerator, so rather than deny the permit and have Rinker resubmit, since a GP is either complete or incomplete, we plan on identifying this during our next quarterly inspection and note the correct number on the inspection form.
 2. Specific condition # 13 in the air permit for the stone dryer requires the permittee to maintain a log that shows the PCB content on any soil containing used oil, hydraulic oil, and/or mineral oil; the source of the PCB contaminated soil; the tons of PCB contaminated soil treated; the PCB content of the oil that contaminated the soil; the quantity of each batch of soil treated; and the total amount of PCB's treated during the preceding 12 month period. Since all the treated soil goes into the cement process, this log information for the air permit would be kept separately and reviewed during each inspection, and the general permit will expire before the air permit, it seems slightly redundant from a completeness standpoint to include it in the general permit also; however, if any problems arise during the quarterly inspections we can address them during the general permit renewal.
- With this in mind the modification was approved and will be mailed today with a copy coming your way. Thanks again for all your help.

Memorandum

Florida Department of
Environmental Protection

TO: Paul Wierzbicki, Southeast District Office

FROM: Tom Conrardy, ^{TC} Engineering Support Section
Bureau of Waste Cleanup

DATE: November 18, 1993

SUBJECT: Rinker Materials Corporation, Soil Thermal Treatment
Modification to General Permit

I have reviewed the application to modify the General Permit for the Rinker Materials Corporation Soil Thermal Treatment Facility. I have the following comments:

1. The notice of intent should be modified to reflect the new number of the air permit issued September 21, 1993.
2. The statement under issue 2. regarding compliance with PCB record keeping requirements is not adequate. The existing forms for record keeping of pretreatment and post treatment soil analysis do not include the necessary information regarding PCB contaminated soil. Rinker needs to develop a new form to contain the necessary information. A new form should include as a minimum, source of PCB contaminated soil, PCB concentration in the soil, PCB concentration in the oil source of contamination, soil stockpile identification, and an area on the form to indicate confirmation that the treated soil was incorporated into the concrete manufacturing process (date). The new form containing this information may be attached to the standard record keeping forms that contain the other required analytical information. It is suggested that the completed forms for soil containing PCBs be stored in a separate file at the thermal treatment facility for easy access for inspection purposes.

I have no other comments on the modification to the leachate collection system or the drummed materials operations. If you have any questions, please call me at SC 278-0190.

TC/tc

Issues addressed in air permit



Florida Department of Environmental Regulation

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

Paul W.
11/9 BT

Permit Data Form

Project Source Name Rinker/Interals Stationary Soil Thermal Treatment
Type Code SO Subcode 17 Check it: EXP Exempt: Correct Fee 500.00
Amount Received 500.00
Permit Processor's Initial PAW Data Entry Operator's Initial BJ Amount Refund
Comments:

SO13-240731



Rinker

63-568
631

BARNETT BANK
CALHOUN AT JEFFERSON ST.
TALLAHASSEE, FL 32301

048791

P.O. BOX 24635
WEST PALM BEACH, FL 33416-4635
PHONE (407) 833-5555

DATE

CHECK NO.

NET AMOUNT

07/20/93

00048791

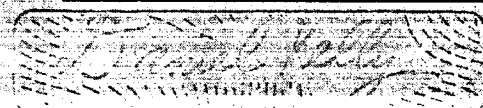
*****500.00

FIVE HUNDRED AND 00/100



TO THE
ORDER
OF

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
1200 SOUTH CONGRESS AVENUE
WEST PALM BEACH FL 33406



Department of Environmental Regulation
Routing and Transmittal Slip

To: (Name, Office, Location)

1. Tom Connardy, DEP, Tallahassee

2.

3.

4.

Remarks:

Re: Rinker materials Corp.

From:

Paul Wierzbicki

Date

11/15/93

Phone

SC 232-2450

ENFORCEMENT REQUEST FOR ASSISTANCE

TO: Tom Conrady, P.E. DEP/Tallahassee

THROUGH: ASSISTANT DISTRICT MANAGER (Groundwater Issue) OR
PERMITTING SECTION HEAD (Technical Compliance/Permitting)

FROM: ENFORCEMENT SECTION HEAD

DATE: 11/15/93

CASE NAME: Rinker Materials Corporation - Stationary Soil

Please provide the following assistance in reference to the above
enforcement case:

____ Your participation at an Informal Conference to resolve Thermal Treatment
outstanding issues. This conference has been scheduled for
Date: _____ Time: _____

X Please review the attached documents (indicated below) and provide
written comments by _____. If you would prefer to
have an in-house staff meeting to discuss your comments please
advise me within one week of the comment deadline date.

____ PCAP (Preliminary Contamination Assessment Plan)

____ PCAR (Preliminary Contamination Assessment Report)

____ CAP (Contamination Assessment Plan)

____ CAR (Contamination Assessment Report)

____ FS (Feasibility Study)

____ FSP (Feasibility Study Plan)

____ RAP (Remedial Action Plan)

____ Data/ Informational Response

____ Draft Consent Order

X Other: Permit Application - 17-TT5, FAC.
GP - (PCB Soils)

DISCUSSION (If applicable):

REQUESTED BY: R. Wierzbicki



Rinker Materials

November 8, 1993

RECEIVED
NOV 09 1993
DEPT. OF ENV. PROTECTION
WEST PALM BEACH

Rinker Materials Corporation
1200 N.W. 137th Avenue
Miami, FL 33182

P.O. Box 650679
Miami, FL 33265-0679

Facsimile (305) 223-5403
Telephone (305) 221-7645

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST DISTRICT
1900 SOUTH CONGRESS AVENUE
WEST PALM BEACH, FLORIDA 33406
ATTN: PAUL WIERZBICKI

RE: GENERAL PERMIT NO: 5013-195017

Dear Paul:

Enclosed is the notice of intent required by Rule 17-775 for Rinker Materials to modify General Permit No. 5013-195017 to accept and treat low level PCB contaminated soils.

As discussed previously this modification addresses:

1. PCB contaminated soils
2. Moving the leachate collection outside the building
3. Drummed material operations.

If there are any questions please contact me at 305-221-7645. Thank you for your assistance in this matter.

Very Truly Yours,

Michael D. Vardeman
Cement Division Environmental Manager

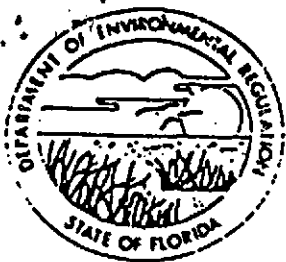


EXHIBIT A

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

NOTICE OF INTENT TO USE THE GENERAL PERMIT TO
CONSTRUCT/OPERATE A SOIL THERMAL TREATMENT FACILITY

INSTRUCTIONS: Please provide all information as requested below. For stationary facilities submit the original and four copies of this notice of intent application along with site location map, process flow chart drawings of the treatment facility, and groundwater monitoring plan to the appropriate district office, and one copy of the groundwater monitoring plan to the Bureau of Waste Cleanup. For mobile units submit applicable information to the Bureau of Waste Cleanup, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Type: Stationary X Mobile General Permit No.: 5013-195017

Name of Facility: RINKER MATERIALS CORPORATION County: DADE

Facility Address: 1200 NW 137 AVENUE MIAMI, FLORIDA 33182

Latitude 25 ° 46 ' 48 " N Longitude 80 ° 25 ' 10 " W

Telephone Number: 305-221-7645

Name of Owner(s): RINKER MATERIALS CORPORATION

Owner(s) Address if different from above: SAME

Department of Environmental Regulation Air Permit Number: A013-233208

Expiration Date: January 15, 1995

Length of primary chamber (ft): 80ft.

Heat generation capability (BTU/hr): 40mm

Capacity of facility at a 25 minute retention time
(yd³/hr): or (tons/hr): 40

Operating temperature of primary chamber (°F): 1000° Discharge

Estimated average volume of soil to be processed (yd³/mth): 5,000 To 29,000

Covered storage area (ft²): 30,000 Height of cover (ft): 45'

Floor construction (cement, asphalt, etc.): Cement

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NOV 09 1993

DEPT. OF ENV. PROTECTION
WEST PALM BEACH

Statement by Applicant:

I hereby attest as the owner or authorized representative of
RINKER MATERIALS CORPORATION (attach letter of
authorization) the preceding information is accurate and that I
will operate this facility in accordance with the requirements of
Chapter 17-775 entitled "Soil Thermal Treatment Facilities." I
understand that failure to operate this facility as required will
constitute grounds for revocation of this permit.

James S. Jenkins III
Signature of Owner or Authorized Representative

James S. Jenkins III, V.P. Cement Operations
Name and Title

8-5-93
Date

Statement by Florida Registered Professional Engineer:

I hereby certify that the above information pertinent to the
construction and operation of this facility is correct and that
this facility is capable of operating to achieve the requirements
and standards as set forth in Chapter 17-775 of the Florida
Administrative Code.

Donald A. Beers
Signature of Engineer
(affix seal)

Donald A. Beers, P.E.
Engineer's Name (Please Type)

PE 0032530
Florida Registration Number

Rinker Materials Corporation
Company Name

P.O. BOX 24635 West Palm Beach
Address Street City 33416-4635

8/10/93 407-820-8346
Date Telephone Number

DLB
11/9/93

RECEIVED

AUG 10 1993

DEPT. OF ENV. PROTECTION
WEST PALM BEACH

Rinker

P.O. BOX 24635
WEST PALM BEACH, FL 33416-4635
PHONE (407) 833-5555

93-568
631

BARNETT BANK
CALHOUN AT JEFFERSON ST.
TALLAHASSEE, FL 32301

048791

DATE

07/20/93

CHECK NO.

00048791

NET AMOUNT

*****500.00

PAY

FIVE HUNDRED AND 00/100

TO THE
ORDER
OF

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
1200 SOUTH CONGRESS AVENUE
WEST PALM BEACH FL 33406

RINKER MATERIALS CORPORATION

Rinker

01-000-092095

PLEASE DETACH BEFORE DEPOSITING

RINKER MATERIALS

VOUCHER NUMBER	INVOICE NUMBER	PURCHASE ORDER	INVOICE DATE	AMOUNT	DISCOUNT	NET AMOUNT
164718	116926	405084430	07-16-93	500.00	.00	500.00
TOTALS					00	500.00



Rinker

RECEIVED
NOV 09 1993
HAND DELIVERED
DEPT. OF ENV. PROTECTION
WEST PALM BEACH

RECEIVED
AUG 10 1993
DEPT. OF ENV. PROTECTION
WEST PALM BEACH

Rinker Materials Corporation
1501 Belvedere Road
West Palm Beach, FL 33406

P.O. Box 24635
West Palm Beach, FL 33416

Facsimile (407) 820-8508
Telephone (407) 833-5555

LETTER OF TRANSMITTAL

TO: Florida DEP
Southeast District
1900 So. Congress Avenue
West Palm Beach, FL 33406

DATE: August 10, 1993
ATTN:
RE: Notice of Intent for
RPCC Soil Thermal Treat-
ment facility

GENTLEMEN:

WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via _____
the following items:

- ☐ Contracts ☐ Prints ☐ Specifications
☐ Change Order ☐ _____


COPIES	DESCRIPTION
1	Check # 048791 for \$500.00
5	Notice of Intent Application/signed & sealed
3	Siteplan #93-1505, sheet 1/signed & sealed

THESE ARE TRANSMITTED as checked below:

- ☒ For approval ☐ For your use ☐ For review and comment
☐ As requested ☐ _____

REMARKS If you have any questions regarding the attached, please contact
Mike Vardeman or Keith Troutman at (305) 221-7645.

cc: J. Porter, M. Vardeman, File


Pamela Thompson



Rinker Materials

November 8, 1993

RECEIVED
NOV 09 1993
DEPT. OF ENV. PROTECTION
WEST PALM BEACH

Rinker Materials Corporation
1200 N.W. 137th Avenue
Miami, FL 33182

P.O. Box 650679
Miami, FL 33265-0679

Facsimile (305) 223-5403
Telephone (305) 221-7645

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST DISTRICT
1900 SOUTH CONGRESS AVENUE
WEST PALM BEACH, FLORIDA 33406
ATTN: PAUL WIERZBICKI

RE: GENERAL PERMIT NO: 5013-195017

Dear Paul:

Enclosed is the notice of intent required by Rule 17-775 for Rinker Materials to modify General Permit No. 5013-195017 to accept and treat low level PCB contaminated soils.

As discussed previously this modification addresses:

1. PCB contaminated soils
2. Moving the leachate collection outside the building
3. Drummed material operations.

If there are any questions please contact me at 305-221-7645. Thank you for your assistance in this matter.

Very Truly Yours,

Michael D. Vardeman
Cement Division Environmental Manager

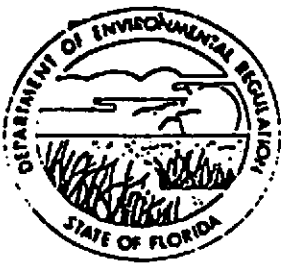


EXHIBIT A

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

RECEIVED

Carol M. Browner, Secretary

NOTICE OF INTENT TO ~~NOT~~ THE GENERAL PERMIT TO
CONSTRUCT/OPERATE A SOIL THERMAL TREATMENT FACILITY

DEPT. OF ENV. PROTECTION
WEST PALM BEACH

INSTRUCTIONS: Please provide all information as requested below. For stationary facilities submit the original and four copies of this notice of intent application along with site location map, process flow chart drawings of the treatment facility, and groundwater monitoring plan to the appropriate district office, and one copy of the groundwater monitoring plan to the Bureau of Waste Cleanup. For mobile units submit applicable information to the Bureau of Waste Cleanup, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Type: Stationary X Mobile General Permit No.: 5013-195017

Name of Facility: RINKER MATERIALS CORPORATION County: DADE

Facility Address: 1200 NW 137 AVENUE MIAMI, FLORIDA 33182

Latitude 25 ° 46 ' 48 " N Longitude 80 ° 25 ' 10 " W

Telephone Number: 305-221-7645

Name of Owner(s): RINKER MATERIALS CORPORATION

Owner(s) Address if different from above: SAME

Department of Environmental Regulation Air Permit Number: A013-233208

Expiration Date: January 15, 1995

Length of primary chamber (ft): 80ft.

Heat generation capability (BTU/hr): 40mm

Capacity of facility at a 25 minute retention time
(yd³/hr): or (tons/hr): 40

Operating temperature of primary chamber (°F): 1000° Discharge

Estimated average volume of soil to be processed (yd³/mth): 5,000 To 29,000

Covered storage area (ft²): 30,000 Height of cover (ft): 45'

Floor construction (cement, asphalt, etc.): Cement

RECEIVED

AUG 10 1993

RECEIVED
NOV 09 1993
DEPT. OF ENV. PROTECTION
WEST PALM BEACH

Statement by Applicant:

I hereby attest as the owner or authorized representative of
RINKER MATERIALS CORPORATION (attach letter of
authorization) the preceding information is accurate and that I
will operate this facility in accordance with the requirements of
Chapter 17-775 entitled "Soil Thermal Treatment Facilities." I
understand that failure to operate this facility as required will
constitute grounds for revocation of this permit.

James S. Jenkins III
Signature of Owner or Authorized Representative

James S. Jenkins III, V.P. Cement Operations
Name and Title

8-5-93
Date

Statement by Florida Registered Professional Engineer:

I hereby certify that the above information pertinent to the
construction an operation of this facility is correct and that
this facility is capable of operating to achieve the requirements
and standards as set forth in Chapter 17-775 of the Florida
Administrative Code.

[Signature]
Signature of Engineer
(affix seal)

Donald A. Beers, P.E.
Engineer's Name (Please Type)

PE 0032530
Florida Registration Number

Rinker Materials Corporation
Company Name

P.O. BOX 24635 West Palm Beach
Address Street City 33416-4635

8/10/93 407-820-8346
Date Telephone Number

[Signature]
11/9/93

RECEIVED
AUG 10 1993
DEPT. OF ENV. PROTECTION
WEST PALM BEACH

PCB CONTAMINATED SOILS

Rinker is providing the following notice of intent in compliance with Rule 17-775.410(6)

Rinker intends to treat low levels of PCB contaminated soils in compliance with Rule 17-775, General Permit No. SO13-195017 and Air permit number AO 13-234126 (attached).

The descriptions below address the questions required by this notice.

1. Describe the types of finished product line for which the soil will be used following treatment.

All of the PCB soils after treatment will be included in the portland cement manufacturing process.

2. A sample of the record keeping forms for PCB analytical information, tracking the PCB contaminated soil which the facility accepts, and record keeping the type of finished product line for which the soil contaminated with PCB,s is used shall be attached.

Rinker utilizes the Florida Department of Environmental Protection Untreated Soil Reporting Form and Treated Soil Reporting form to meet the above requirements. See Attachment

3. A narrative description should be provided of the procedure which will be followed to separately handle and stockpile the PCB contaminated soil both before and after treatment. It must be demonstrated that the facility has adequate storage facilities to accommodate the separate handling of PCB contaminated soil, both before and after thermal treatment.

To prevent the intrusion of the weather element, a pre-treatment soils storage area consists of a steel building erected to enclose a concrete walled 110 foot by 306 foot monolithic (12 inch thick) reinforced concrete slab. This building is open on one side allowing access for handling equipment and truck entry and egress along any point of the open face.

The size and easy access of this facility allows Rinker to easily segregate low level PCB contaminated soils from other contaminated materials within the building. This is also accomplished thru scheduling of materials receipts to insure the adequacy of space available. Screening and any sizing of these materials will also be processed independently of any other materials on site.

PCB CONTAMINATED SOILS

When screened and sized these materials will be moved to the feed area for the thermal desorber for treatment. They will be processed independently of any other materials. After treatment these soils will be used in the cement manufacturing process as raw materials and will in fact be passed thru a second pyroprocessing operation when converted to clinker.

4. Soil sampling and analysis.

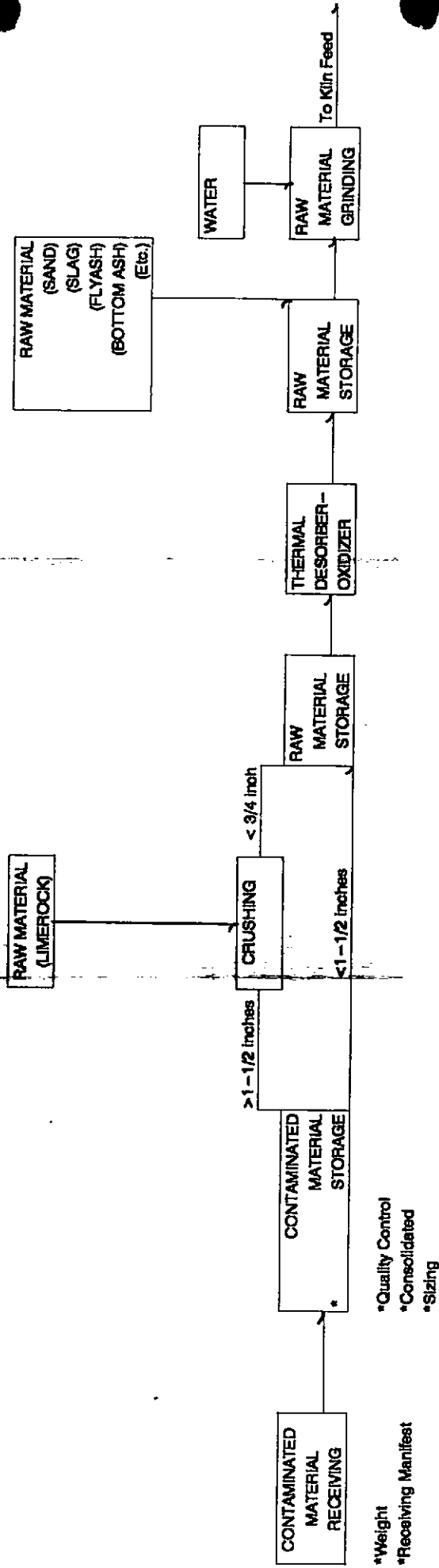
Rinker Materials will require the generator of low level PCB contaminated soils to precertify these materials thru the sampling and analysis requirements specified in 17-775.410. Rinker will accept these materials only after the provisions are met.

5. Alternate procedure.

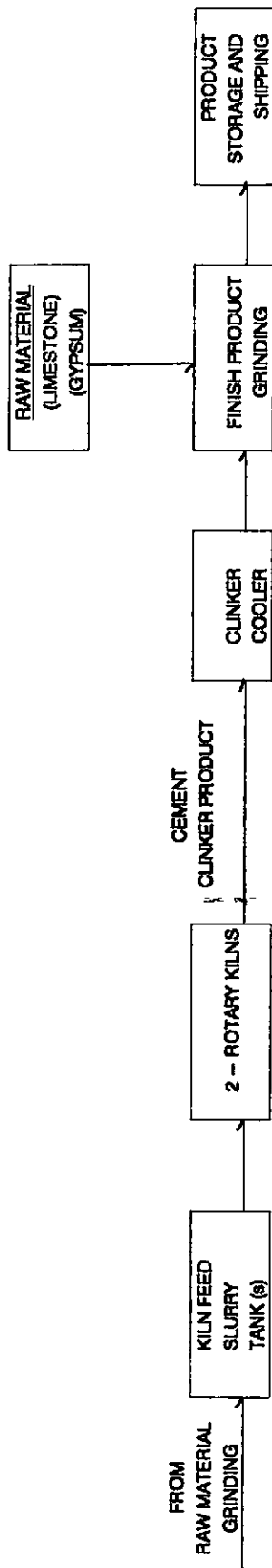
Rinker will continue to comply with the existing approved alternate procedure dated April 1, 1991.

PROCESS FLOW DIAGRAM

PAGE 1



PROCESS FLOW DIAGRAM PAGE 2



- *Product Exit Temp - + 2800 F
- *Product Retention - 3 hr min.
- *Physical & Chemical Transition

Name of Facility: _____
Air Permit No.: _____
Soil Treatment Permit No.: _____
Stationary: _____ or Mobile Facility: _____

DER For 1-775.900(3)

See reverse side for instructions

[illegible]

reated Soil Reporting Form

Samples must be collected and analyzed at least once each day that the thermal treatment facility is processing contaminated soil. Samples from both untreated and treated soil must be collected and analyzed. Pretreatment sampling is based on the volume of soil from each source, and post treatment sampling is determined by the hours of operation. Each composite sample must be made up of several representative samples. For all analytical results showing below detection limits, BDL should be shown in the proper space. When results indicate contaminants above detectable limits, the concentrations should be shown. Copies of lab reports must be attached to form.

Column

1. Date soil processed.
2. Identification number of specific batch of soil.
3. Sample number. The required number of samples is based upon the volume of soil before treatment and is based upon hours of operation during treatment.
4. Number of hours required of treat specific batch of soil.
5. Amount of soil that was processed through thermal treatment facility, yd³ or tons.
6. Total metals concentrations of Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver in the treated soil in ppm (mg/kg) by digestion procedure EPA Method 3050.
7. TCLP metals concentrations of Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver in the treated soil in ppm (mg/l) by extraction procedure EPA Method 1311.
8. Total benzene, toluene, ethylbenzene and xylene in treated soil in ppb. (Maximum allowable to dispose of as clean fill-100 ppb).
9. Total recoverable petroleum hydrocarbons in treated soil in ppm. Maximum allowable to dispose of as clean fill-10 ppm, or 50 ppm if PAHs less than 6 ppm and VOH less than 50 ppb. EPA Draft Method 9073.
10. PAH concentrations in the treated soil consisting of (Benzo(a)pyrene, Benzo(a)anthracene, Benzo(b)fluoranthene, Benzo(k)fluoranthene, Benzo(g,h,i)perylene, Chrysene, Dibenzo(a,h)anthracene, Ideno(1,2,3-c,d)pyrene), in ppm (mg/kg) by EPA Methods 3510/8250, 3510/8270, 3540/8250, 3540/8270, 3550/8250, 3550/8270, 3540/8310 or 3550/8310.
11. Total volatile organic halogen concentrations in treated soils in ppb by EPA Method 5030/8010.

Florida Department of Environmental Regulation
 Two Towers Office Bldg. • 2640 Blair Stone Road • Tallahassee, Florida 32399-2-000

Name of Facility _____
 Air Permit No. _____
 Soil Treatment Permit No. _____
 Stationary _____ or Mobile Facility _____

**Soil Thermal Treatment Facility
 Untreated Soil Reporting Form**

DEIR Form # 17-7761000(2) Soil Thermal Treatment Facility Untreated Soil Reporting Form Effective Date: November 30, 1992 DEIR Application No. _____ (if sent to by DEIR)

Month: _____ Year: _____

1	2	3	4	5										6	7	8	9
Day of Mo.	Soil Batch ID#	Sample Number	Amount, Volume or Weight g/Ln	Analytical Results										Totals		Indicate Other Analyses Attach Lab Results Only	
				As	Ba	Cd	Cr	Pb	Hg	Se	Ag	VOA	RPH	VOH			

DEP Form 17-775.900(2)
Soil Thermal Treatment Facility Untreated Soil Reporting Form
Form To: _____
Effective Date: <u>November 30, 1992</u>
DEP Application No. _____ (Filed in by DEP)

Instructions for Completing Untreated Soil Reporting Form

Samples from both untreated and treated soil must be collected and analyzed. Pretreatment sampling is based on the volume of soil from each source, and post treatment sampling is determined by the hours of operation. Each composite sample must be made up of several representative samples. For all analytical results showing below detection limits, BDL should be shown in the proper space. When results indicate contaminants above detectable limits, the concentrations should be shown. Copies of lab reports must be attached to form.

Column

1. Date soil received.
2. Identification number of specific batch of soil.
3. Sample number The required number of samples is based upon the volume of soil before treatment and is based upon hours of operation after treatment.
4. Total volume of soil being processed through heat treatment facility, yd³ or tons
5. Metals concentrations of Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver in the untreated soil in ppm (mg/kg) by extraction procedure EPA Method 3050.
6. Total benzene, toluene, ethylbenzene and xylene concentration in untreated soils in ppb (ug/kg). EPA Method 5030/8020. There are no maximum allowable concentrations.
7. Total recoverable petroleum hydrocarbons in untreated soils. EPA Draft Method 9073.
8. Volatile Organic Halocarbons in untreated soils.
9. Other parameters that are monitored by the facility should be indicated but not quantified. Attach lab results only.



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

SEP 21 1993

NOTICE OF PERMIT ISSUANCE

CERTIFIED MAIL

In the Matter of an Application
for Permit by:

DEP File No. AO 13-234126
Dade County

Mr. James S. Jenkins, III /
Rinker Material Corporation /
Post Office Box 650679 /
Miami, Florida 33265-0679 /

Enclosed is Permit Number AO 13-234126 to operate an air pollution source issued pursuant to Section 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information;

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

Mr. James S. Jenkins, III
Rinker Material Corporation
Post Office Box 650679
Miami, Florida 33265-0679
Page 2

DEP File AO 13-234126


If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 17-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION




for Mary E. S. Williams
Director of District Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF PERMIT ISSUANCE and all copies were mailed by certified mail before the close of business on 9/21/93 to the listed persons.

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

 SEP 21 1993
(Clerk) (Date)

cc: Dade County Environmental Resources Management



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southeast District
P.O. Box 15425
West Palm Beach, Florida 33416

Virginia B. Wetherell
Secretary

PERMITTEE:

Mr. James S. Jenkins, III
Rinker Material Corporation
Post Office Box 650679
Miami, Florida 33265-0679

I.D. NUMBER: 50/DAD/13/0014

PERMIT/CERTIFICATION NUMBER: AO 13-234126

DATE OF ISSUE: SEP 21 1993

EXPIRATION DATE: September 17, 1998

COUNTY: Dade

LATITUDE/LONGITUDE: 25°46'48"N/80°25'10"W

UTM: Zone 17: 558.2 Km. E; 2851.3 Km. N

PROJECT: Rinker Material Corporation

Modification of Stone Dryer at Portland
Cement Manufacturing Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule 17-212 & 17-4, and in conformance with all existing regulations of the Florida Department of Environmental Protection. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

OPERATE: Stone dryer system decontaminating up to 40 TPH of petroleum contaminated soil. Major components of the system are Gencor Ultraflame low excess air oil burners for the existing 7 ft. diameter by 80 ft. long rotary dryer, an 85° efficient Joy-Western multicyclone, a 99.9% efficient Micropul baghouse with 3,366 a sq. ft. of cloth area, a 99.5% efficient natural gas fired IT/McGill afterburner, two heat exchangers for energy recovery, a raw material gallery controlled with a Micropul baghouse that discharges approximately 500 acfm at 400°F through a 1.0 ft. square stack that is 45 ft. high, material handling equipment (screens, inclined belt feeders, bucket elevator, crusher, and stacker), fuel systems (used petroleum oil meeting the provisions of 40 CFR 266, Subpart E, propane, natural gas, and No. 2 fuel oil for the dryer, and natural gas and propane for the afterburner), a by-pass stack to be used only when the kiln is drying stone, and associated equipment. Air pollutants from the dryer are discharged in approximately 36,500 acfm of 800°F flue gases through a 4.5 ft. diameter by 80 ft. high stack.

IN ACCORDANCE WITH: Certificate of Completion of Construction for Permit Number AC 13-187599A received June 25, 1993; amendment to the modification number AC 13-187599 issued May 17, 1993; modification number AC 13-187599 issued September 24, 1993; application to modify existing stone dryer received December 10, 1990. (none are attached).

LOCATED AT: 1200 N.W. 137th Avenue, Miami, Dade County, Florida.

TO SERVE: Soil Thermal treatment facility (SIC # 4953).

SUBJECT TO: General Conditions 1-14 and Specific Conditions 1-32.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under the conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in the permit, the permittee shall immediately notify and provide the Department with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

GENERAL CONDITIONS:

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department, may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rule 17-4.120 and 17-30.300, F.A.C., as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following :

(a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically, unless otherwise stipulated by the Department.

(b) The permittee shall hold at the facility or other location designated by this permit, records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit.

These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

(c) Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

PERMITTEE:

Mr. James S. Jenkins, III
Rinker Material Corporation
Miami, Florida 33265

I.D. NUMBER: 50/DAD/13/0014**PERMIT/CERTIFICATION NUMBER: AO 13-234126****DATE OF ISSUE: SEP 21 1993****EXPIRATION DATE: September 17, 1998****SPECIFIC CONDITIONS**

1. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-296 and 17-297, F.A.C., or any other requirements under federal, state, or local regulations. The permittee is also required to comply with F.A.C. Rule 17-775 and any applicable county regulation which may include requirements for a county operation permit.
2. The stack sampling facilities must comply with Rule 17-297.345, F.A.C.
3. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration (Rule 17-296.415(1)(c), F.A.C.).
4. Particulate matter (PM) and lead emissions from the dryer shall not exceed any of the following limits (Based on data in the application and Rule 17-296.415(2)(b), F.A.C.):
 - (A) 0.04 grams PM per dry standard cubic foot.
 - (B) 3.3 pounds PM per hour (max.), 1.0 pounds PM per hour (avg.).
 - (C) 4.38 tons PM in any 12 consecutive month period.
 - (D) 0.13 pounds lead per hour.
5. Particulate matter emissions from the fugitive dust baghouse shall not exceed 0.02 grains/dscf, nor 0.5 lbs/hr. Visible emissions from any part of the process shall not exceed 5 percent opacity.
6. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 17-296.415(1)(b), F.A.C.).
7. Visible emissions from the afterburner stack shall not exceed 5 percent opacity (Rule 17-296.415(2)(a), F.A.C.).
8. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 17-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 296.415(3), F.A.C.).

PERMITTEE:

Mr. James S. Jenkins, III
Rinker Material Corporation
Miami, Florida 33265-0679

I.D. NUMBER: 50/DAD/13/0014**PERMIT/CERTIFICATION NUMBER: AO 13-234126****DATE OF ISSUE: SEP 21 1993****EXPIRATION DATE: September 17, 1998****SPECIFIC CONDITIONS:**

9. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 17-296.320, F.A.C.).
10. The system shall be properly operated and maintained (F.A.C. Rule 17-210.300(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-210.650). The afterburner must be in service any time the stone dryer is used to decontaminate soil. The use of the afterburner is not required when the dryer is used to dry stone. In case of excess emissions resulting from a malfunction, the permittee shall notify the Dade County Department of Environmental Resources Management and the Department's Southeast District Office within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction (Rule 17-210.700, F.A.C.).
11. The facility shall only treat petroleum contaminated soil as defined in F.A.C. Rule 17-775.200(9), (F.A.C. Rule 17-296.415), whose metal concentrations do not exceed the limits shown in Table I of F.A.C. Rule 17-775.400(3).
12. Soil containing more than 1.4 percent petroleum (daily average) products shall not be treated in this facility unless it is processed at a rate less than 40 TPH and potential VOC emissions do not exceed 22.8 pounds per hour.
13. This facility may treat polychlorobiphenol (PCB) contaminated soil. Any soil containing PCB must meet all the requirements of F.A.C. Rule 17-775.410(6). The permittee shall maintain a log that shows the PCB content of any soil containing used oil, hydraulic oil, and/or mineral oil; the source of the PCB contaminated soil; the tons of PCB contaminated soil treated; the PCB content of the oil that contaminated the soil; the quantity of PCBs in each batch of soil that is treated; and the total amount of PCBs treated during the preceding 12 month period. Emissions of PCBs from the stack shall not exceed 154 pounds in any consecutive 12 month period. The cumulative weight of emissions shall be calculated using either of the following methods:
 - (a) The weight of PCBs entering the kiln shall be assumed to be the weight emitted.
 - (b) The weight of emission shall be calculated using the weight entering the kiln with adjustment for documented destruction in the facility by a test program conducted by the permittee that is approved by the Department.

Method (a) shall be used until a destruction rate has been established on this system by stack test. Test protocol and methods to be used in determining destruction efficiency shall be submitted to the Department for approval. Method (b) shall not be used until the test results have been reviewed and accepted by the Department.
14. The input rate of petroleum contaminated soil to the facility shall not exceed 40 tons per hour. Material entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.
15. The unit shall not be operated in a manner that creates a nuisance.

PERMITTEE:

Mr. James S. Jenkins, III
Rinker Material Corporation
Miami, Florida 33265-0679

I.D. NUMBER: 50/DAD/13/0014**PERMIT/CERTIFICATION NUMBER: AO 13-234126****DATE OF ISSUE: SEP 21 1993****EXPIRATION DATE: September 17, 1998****SPECIFIC CONDITIONS:**

16. This unit shall be allowed to operate continuously, 24 hours per day, 7 days per week, 52 weeks per year.
17. The input of petroleum contaminants in the soil into the facility shall not exceed 1120 pounds per hour (daily average).
18. The dryer is authorized to burn up to 27.4 MM Btu/hr of waste oil (193 GPD) containing a maximum of 0.4 percent sulfur and 500 ppm lead, No. 2 distillate oil (193 GPH) containing a maximum of 0.5 percent sulfur, and propane (180 CFM)/or natural gas (460 CFM). The maximum fuel oil consumption shall not exceed 769,459 gallons in any 12 month period.
19. The fume incinerator (afterburner) is authorized to burn up to 15.0 MM Btu/hr of natural gas (250 CFM) or propane (100 CFM). The fume incinerator shall be in service any time the stone dryer is being used to process material containing contaminated soil. The by-pass stack must be closed when the unit is processing contaminated soil.
20. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1600 degrees Fahrenheit, and a minimum retention time of 0.5 seconds. If the permittee can document that the retention time of the flue gases in the afterburner is 1 second or more, the afterburner temperature may be reduced to 1500° F (Rule 17-296.415(1)(a), F.A.C.).
21. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.
22. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 17-296.415(1)(c), F.A.C.).
23. Use of the existing cement kiln to decontaminate soil shall cease when the stone dryer begins operation as a soil decontamination unit.
24. The Southeast District and Dade County Department of Environmental Resources Management shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 17-297.340(1)(i), F.A.C.).
25. Any test data submitted with an application for permit to operate (every 5 years) shall include analysis of the filter and impinger catch for arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver along with similar analysis of the contaminated and treated soil processed during the test.
26. Compliance tests results shall be submitted to the Southeast District and Dade County within 45 days of the test.

PERMITTEE:

Mr. James S. Jenkins, III
Rinkèr Material Corporation
Miami, Florida 33265-0679

I.D. NUMBER: 50/DAD/13/0014**PERMIT/CERTIFICATION NUMBER: AO 13-234126****DATE OF ISSUE: SEP 21 1993****EXPIRATION DATE: September 17, 1998****SPECIFIC CONDITIONS:**

27. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department (Rule 17-297.340(2), F.A.C.).
28. The permittee shall maintain a daily log that shows the date, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.
29. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system or performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 17-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.
30. The permittee shall submit to Southeast District each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:
 - (a) Annual amount of material and/or fuels utilized.
 - (b) Annual emissions (note calculation basis).
 - (c) Annual hours of operation.
 - (d) Any changes in the information contained in the permit.
 - (e) All compliance test reports for the preceding year.
 - (f) Temperature and CO exceedance reports for the year.
31. The permittee may request, in writing, that the permit(s) for this facility be modified to authorize the treatment of materials not meeting the specifications in F.A.C. Rule 17-775. The request to the Division of Air Resources Management shall include the appropriate processing fee for a modification, the history of the soil to be treated, an analysis of the contaminants suspected to be in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air impact from the unit will not exceed the Air Toxic Reference Concentration for any toxic pollutant. Public notice may be required by the Department as part of the review to modify the permit(s). The Department will approve or deny each request in writing on a case-by-case basis.

PERMITTEE:

Mr. James S. Jenkins, III
Rinker Material Corporation
Miami, Florida 33265-0679

I.D. NUMBER: 50/DAD/13/0014

PERMIT/CERTIFICATION NUMBER: AO 13-234126

DATE OF ISSUE: SEP 21 1993

EXPIRATION DATE: September 17, 1998


SPECIFIC CONDITIONS:

32. The Permittee shall be aware of and operate under the attached "General Permit Conditions Numbers 1 thru 14". General Permit Conditions are binding upon the Permittee and enforceable pursuant to Chapter 403 of the Florida Statutes.

Executed in West Palm Beach, Florida.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL PROTECTION



for Mary E.S. Williams
Director of District Management

MESW:nk:ms

LEACHATE COLLECTION SYSTEM

Rinker is requesting a modification to our general permit to move the leachate collection system currently located inside the Southeast corner of our Materials storage building. This system will be relocated outside the building, approximately fifteen feet from the southeast corner of the slag and abutted to the main building slab. The tank will be downsized to a 2000 gallon tank and located within a concrete containment system built to contain 130% of the size of the tank. The piping from the material storage building to the tank/containment system will be constructed of double walled piping. These details are outlined on the attached construction print.

The purpose for this request is based on two reasons. Since this system went into operation in February 1992 Rinker has had no occasion to put contaminated waters into this tank. (This is after two wet seasons.) The current tank age, when the building is empty, is difficult to operate around with the loaders and other equipment. The tank is difficult to inspect and keep clear of obstructions when inventory levels increase within the building.

By relocating the tank outside we will not have problems with equipment working around the tank, inventories encroaching on the tank, and inspections can be much more readily made.

If it ever becomes necessary to put any waters into this tank Rinker would still utilize in our process as described in the original permit.

DRUMMED MATERIALS

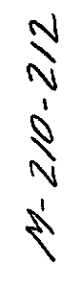
Rinker is handling drummed materials in the following manner. These petroleum contaminated materials are of the same nature and type as those received in bulk. The pre-certification is the same for drummed materials as for bulk materials. When properly approved for receipt and received these materials are emptied within our 110 foot by 306 foot materials storage building for standard processing.

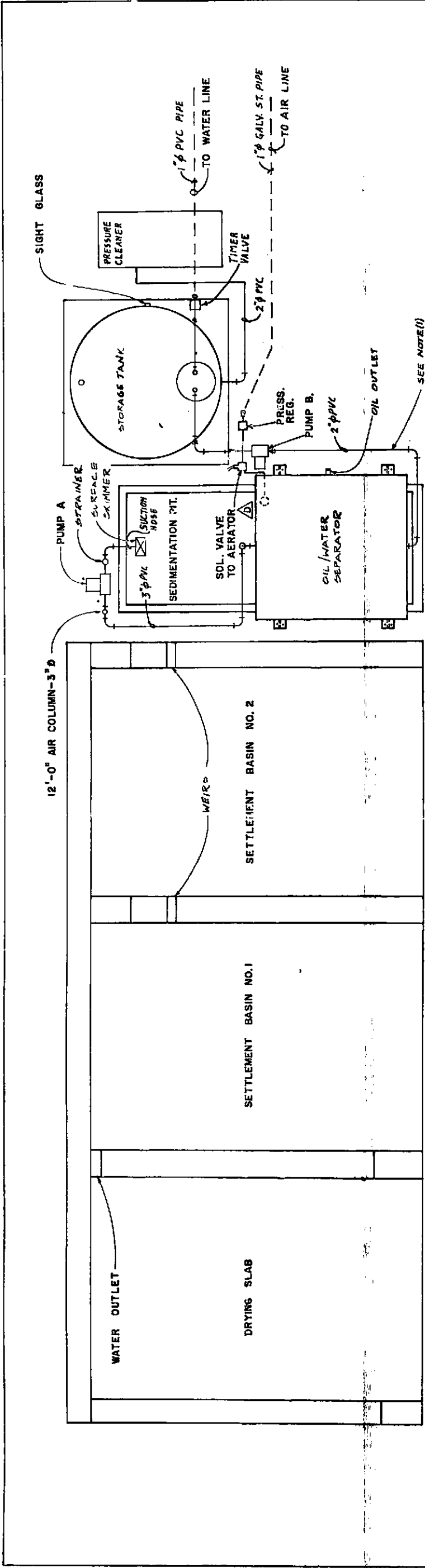
When emptied these drums are moved by flatbed truck (owned and operated by Rinker Materials) to our pressure washing facility. At this totally self contained facility the drums have residual petroleum contaminated materials removed. Then depending on the condition of the drum one of two things happens. If undamaged, the drums are transported to a steel drum facility (currently Southern Steel Drum). If damaged the drum is crushed and transported to a scrap steel recycling facility (currently Miami Iron and Metal Scrap).

The residual contaminated materials collected in this facility are utilized in our process. Contaminated soils are moved to the soils storage building for processing. Water and oil are moved to our oily water system for inclusion in the kiln process and oil is moved into our oil system to be fuel for our kilns.

The self contained cleaning facility was constructed and went into operation in September 1987. This facility was constructed with an integral secondary containment system located underneath the main building to contain any leakage from the primary facility should it ever occur, with a monitoring well included. This monitoring well has a sample visually checked monthly. A sample will be tested for VOC's. This reclaim system for pressure cleaning operations is located with a roofed building including two collection pits, an aeration/settling pit, oil/water separator, and a 2000 gallon aboveground recycled water tank. With sloped floor and collection bins all materials stay within the facility until properly moved for recycling into our process.

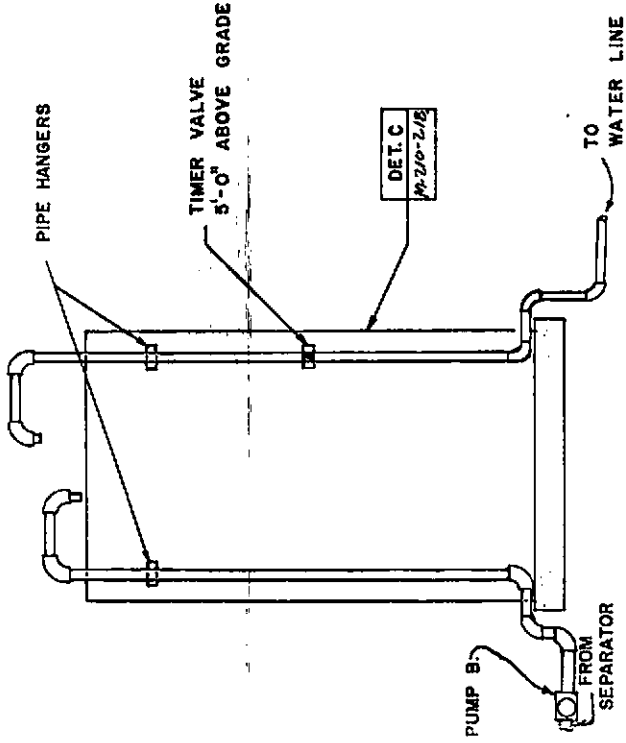
Attached are copies of the original construction prints and certificate of completion of construction. This facility is currently listed on our Dade County IW2-0289-93.





SCALE: N.T.S.

PUMP AND EQUIPMENT SCHEDULE (NEW)						
MARK	MANUFACTURE	MODEL	MOTOR VOLTAGE	MOTOR RPM	OUTLET	INLET
PUMP A	GORMAN RUPP	90-B	3Ø 480 V	1200	3" NPT	2" NPT
PUMP B	LANCASTER	90-4 (1/4 HP)	3Ø 480 V	8450	1 1/2" NPT	1 1/2" NPT
OIL/WATER SEPARATOR	AFL INDUSTRIES	VTC 50A			2" Ø FLANGED 3" Ø FLANGED	
SURFACE SKIMMER	AFL INDUSTRIES	FS-1 (500W)			2" Ø HOSE	
STEAMER	HAYWARD	IN LINE #30			2" NPT	2" NPT
PRESSURE CLEARER	ALKOTA CLEANING SYS.	22000	3Ø 980V		1" NPT (F)	1 1/2" NPT (F)
TIMER VALVE	MC MASTER - CARR	4763 K10			1" NPT (F)	1" NPT (F)
PRESS. REG.	NORGREN	R17-800 RGLA			1" NPT. F.	1" NPT. F.
SOL. VALVE	ASCO	EP82UB27	120V50Hz		1" NPT. F.	1" NPT. F.
SUCTION HOSE		2 1/2" OIL SUCT.				8'-0" IN LENGTH



NOTE: 1) ALL PIPING TO BE FASTENED TO CONCRETE SLAB EVERY 8'-0" AND AT CORNERS
2) ALL PUMP MOTORS TO BE TOTALLY ENCLOSED FAN COOLED

CONSTRUCTION PRINT
Released For Construction
DESTROY ALL OLD PRINTS
Date: BY: [Signature]
RINKER MATERIALS CORP.

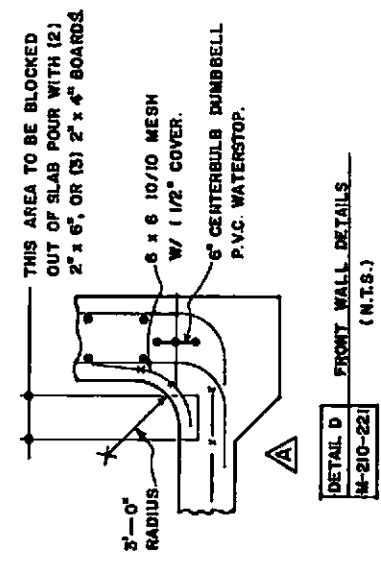
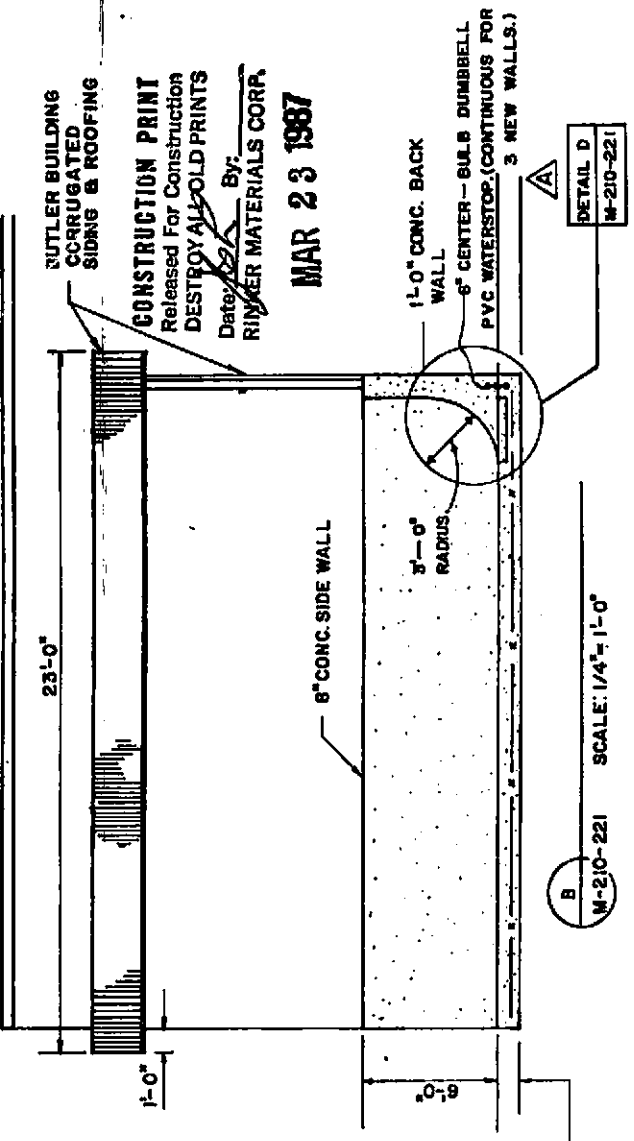
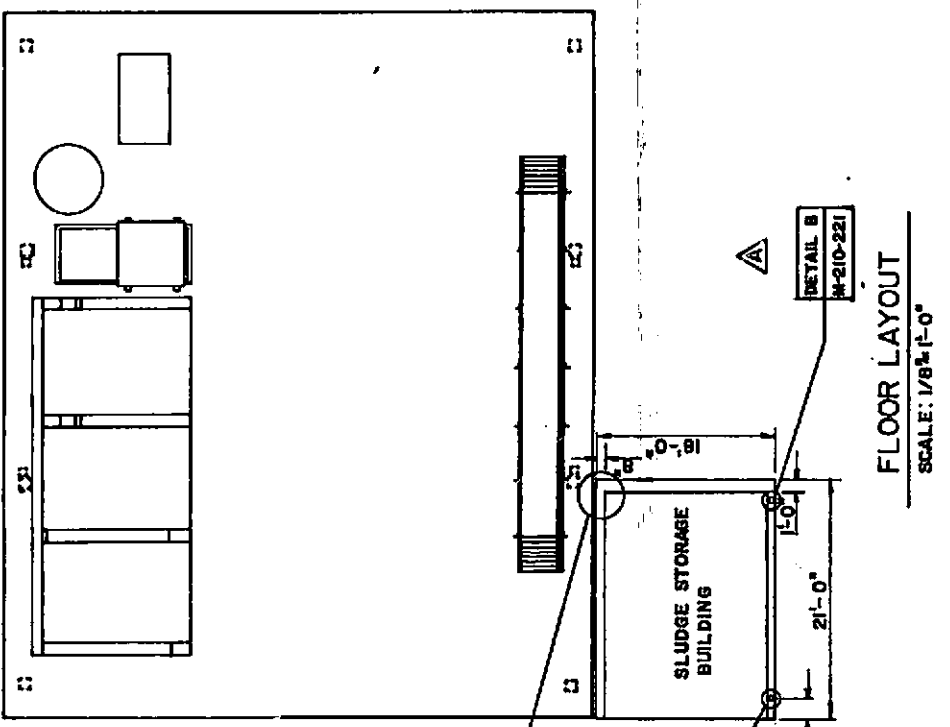
NOV 24 1986

(WEST EL) STORAGE TANK
SCALE: NTS

M-210-217

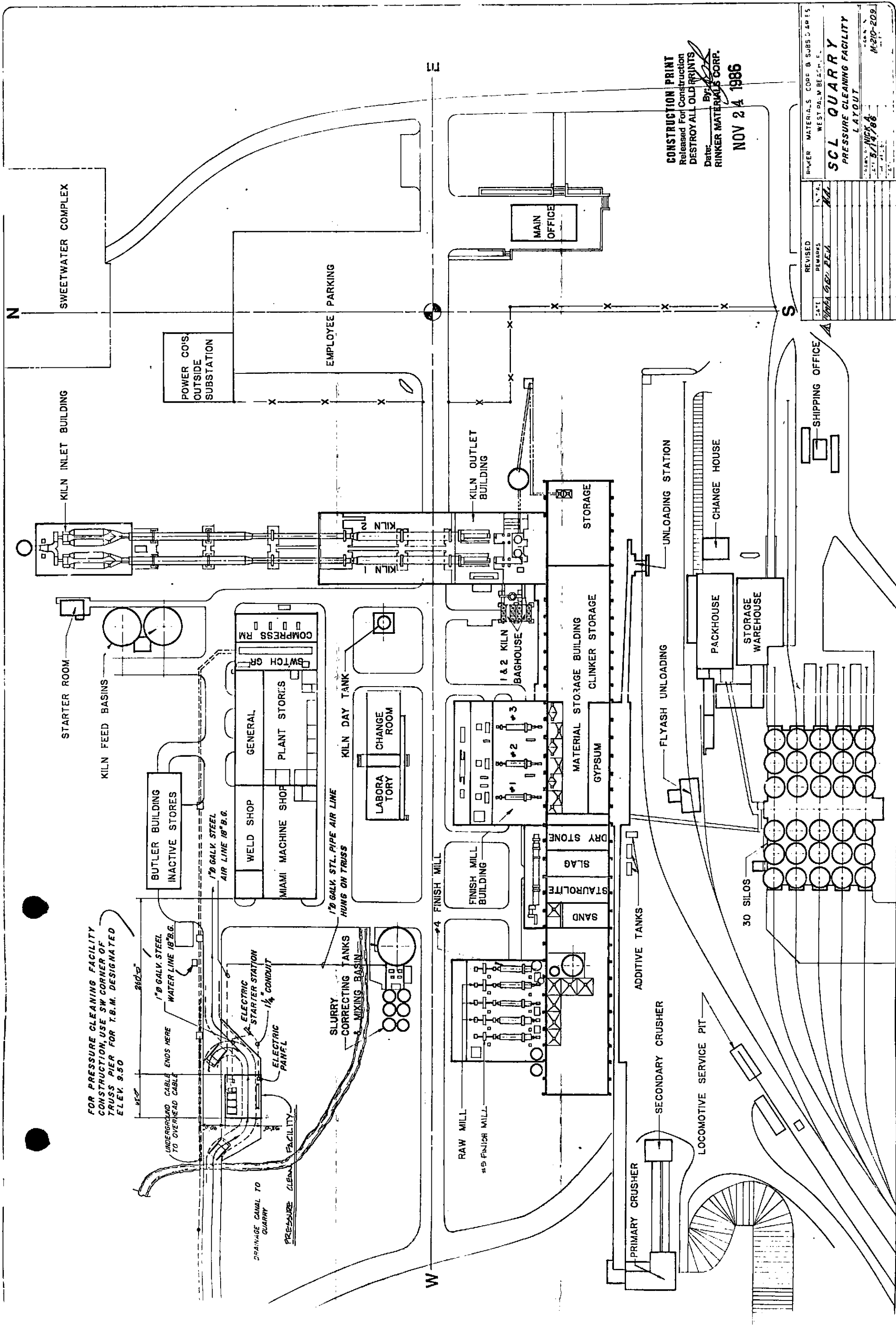
REVISED		INITIAL	
DATE	REMARKS	DATE	REMARKS
11/24/86	GEN. REV.	GAU	
RINKER MATERIALS CORP. & SUBSIDIARIES WEST PALM BEACH, FL		SCL QUARRY —PRESSURE CLEANING PAD— PUMPS AND PIPING	
DRAWN BY: MICK A.		DRAWING NO. M-210-217	
CHECKED BY: [Signature]		SHEET	
DATE		DATE	

M-210-217



NOTES: BUTLER BUILDING SUPPLIED
BY NEWCO STRUCTURES INC.

[illegible]

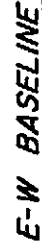


FOR PRESSURE CLEANING FACILITY
CONSTRUCTION, USE SW CORNER OF
TRUSS PIER FOR T.B.M. DESIGNATED
ELEV. 9.50

CONSTRUCTION PRINT
Released For Construction
DESTROY ALL OLD PRINTS
Date: 5/14/88 By: [Signature]
RINKER MATERIALS CORP.
NOV 24 1986

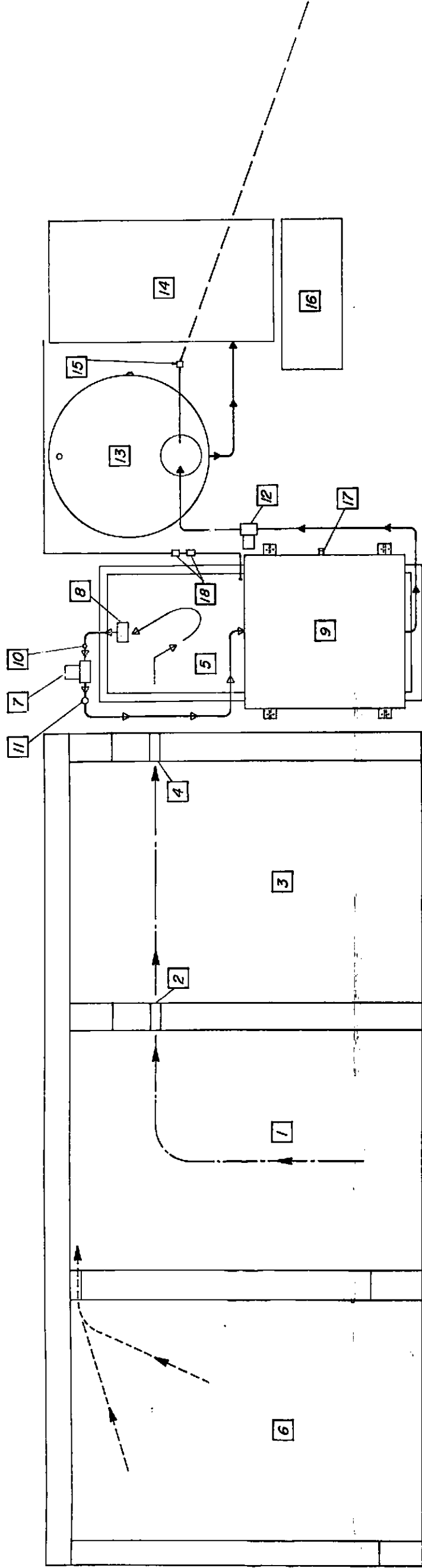
REVISION	DATE	REMARKS	BY
1	5/14/88	REVISED	W. J. RINKER
2	5/14/88	REVISED	W. J. RINKER
3	5/14/88	REVISED	W. J. RINKER
4	5/14/88	REVISED	W. J. RINKER
5	5/14/88	REVISED	W. J. RINKER
6	5/14/88	REVISED	W. J. RINKER
7	5/14/88	REVISED	W. J. RINKER
8	5/14/88	REVISED	W. J. RINKER
9	5/14/88	REVISED	W. J. RINKER
10	5/14/88	REVISED	W. J. RINKER
11	5/14/88	REVISED	W. J. RINKER
12	5/14/88	REVISED	W. J. RINKER
13	5/14/88	REVISED	W. J. RINKER
14	5/14/88	REVISED	W. J. RINKER
15	5/14/88	REVISED	W. J. RINKER
16	5/14/88	REVISED	W. J. RINKER
17	5/14/88	REVISED	W. J. RINKER
18	5/14/88	REVISED	W. J. RINKER
19	5/14/88	REVISED	W. J. RINKER
20	5/14/88	REVISED	W. J. RINKER
21	5/14/88	REVISED	W. J. RINKER
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25	5/14/88	REVISED	W. J. RINKER
26	5/14/88	REVISED	W. J. RINKER
27	5/14/88	REVISED	W. J. RINKER
28	5/14/88	REVISED	W. J. RINKER
29	5/14/88	REVISED	W. J. RINKER
30	5/14/88	REVISED	W. J. RINKER

REVISION MATERIALS CODE B SUBS D APES
WEST PALM BEACH, FL
SCL QUARRY
PRESSURE CLEANING FACILITY
LAYOUT
DATE: 5/14/88 BY: [Signature]
RINKER MATERIALS CORP.
NOV 24 1986



NOV 24 1986

DATE	REVISED	INITIAL
RINKER MATERIALS CORP & SUBSIDIARIES WEST PALM BEACH, FL		
S.C.L. QUARRY PRESSURE CLEANING FACILITY DRAINAGE DITCH MODIFICATION		
DRAWN BY: <i>MJR</i>		DRAWING NO: <i>MP-210-209A</i>
DATE: <i>11/03/86</i>		SHEET
CHECKED BY:	SCALE: <i>1" = 30'-0"</i>	
DATE		



STEAM CLEANING SYSTEM FLOW SEQUENCE

As the trucks are cleaned the water-sludge oil-mixture flows into [1] SETTLEMENT BASIN #1, where the heaviest sediment can settle to the bottom. The excess oily water flows over [2] WIER #1 to [3] SETTLEMENT BASIN #2. Settlement basin #2 allows additional settling before the excess oily water flows over [4] WIER #2 into the [5] SEDIMENTATION PIT. Whenever the sludge in the bottom of either of the basins reaches 3" below the bottom of the wick, the sludge should be removed to the [6] DRYING SLAB where excess water can flow back into the settlement basins.

The sedimentation pit accumulates the oily water runoff from steam cleaning during the day and allows additional settling at night. At 5:00 AM the timer activates the [7] SUMP PUMP, which removes the oily water from the sedimentation pit by means of a [8] SURFACE SKIMMER. The Sump pump is a diaphragm pump which is used so not to agitate the oily water which would emulsify the oil. The Sump pump pumps the oily water to the [9] OIL-WATER SEPARATOR and in the line a [10] FILTER is used to prevent trash from entering the separator and a [11] 12" AIR COLUMN is used to smooth the flow to the separator.

The oil-water separator has two compartments, one for the excess oil and oily water. The other is for the oil free water. The [12] STORAGE FEED PUMP pumps the oil free water from the separator to the [13] STORAGE TANK. The storage tank stores the oil free water for later use in the [14] STEAM CLEANER. The system will require makeup water periodically due to evaporation and the water should be added in the morning directly into the storage tank by means of the [15] TIMER VALVE.

The steam cleaner takes water directly from the storage tank as needed for steam cleaning. The steam cleaner also takes cleaning solution from the [16] CLEANING SOLUTION TANK as needed.

The excess oil in the separator is removed from the [17] OIL OUTLET and the oil is placed in the waste oil tank.

The air line to the separator is controlled by the [18] solenoid valve and pressure regulator.

*Numbers in [] brackets indicate their location on the flow diagram.

CONSTRUCTION PRINT
Released For Construction
DESTROY ALL OLD PRINTS
Date: Nov 24 1986 By: [Signature]
RINKER MATERIALS CORP.

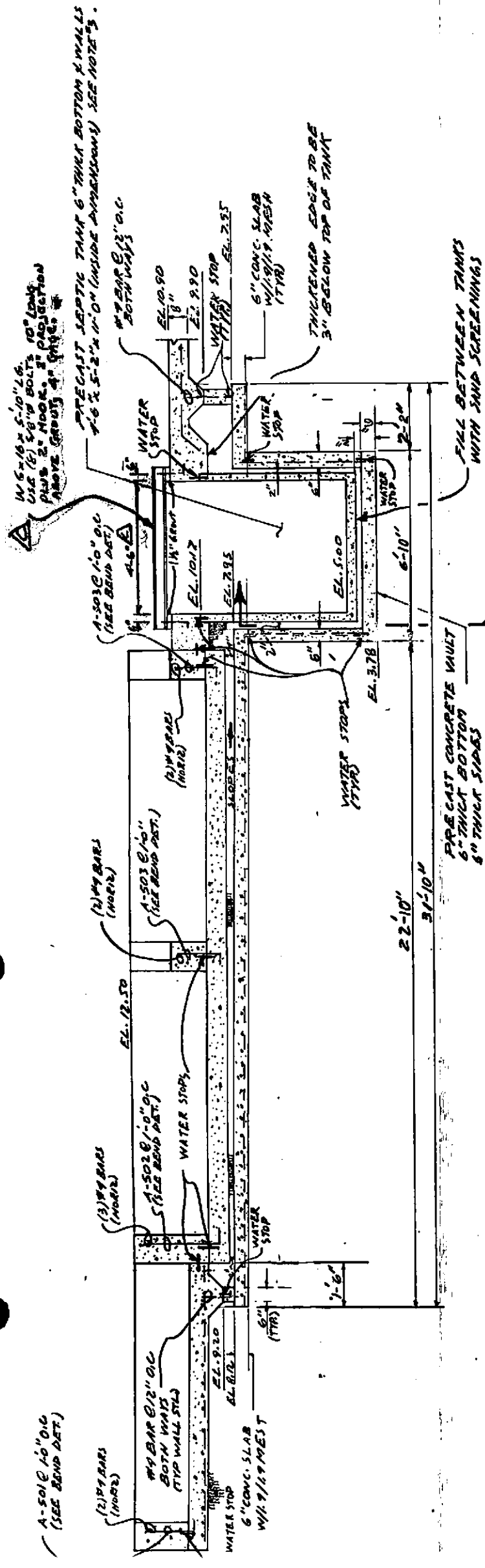
LEGEND



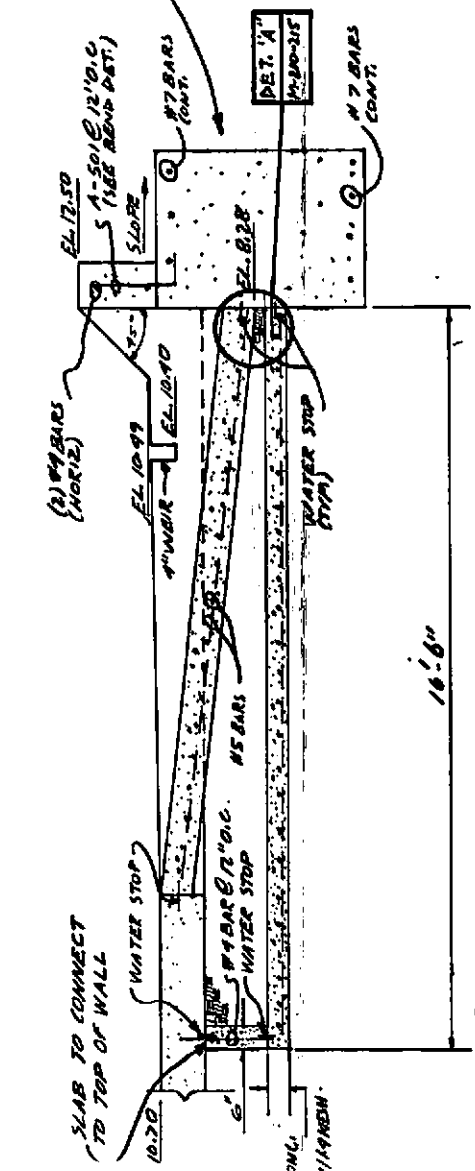
14-210-211

RINKER - MATERIALS CORP & SUBSIDIARIES WEST PALM BEACH, FL	
SCL QUARRY — PRESSURE CLEANING PAD — FLOW DIAGRAM	
DRAWN BY: <u>NICK A.</u>	DRAWING NO. <u>14-210-211</u>
DATE: <u>5/15/86</u>	CHECKED BY: <u>[Signature]</u>
DATE: <u>[Blank]</u>	DATE: <u>[Blank]</u>

14-210-211



SECONDARY CONTAINMENT DETAIL
 SCALE: 1/2" = 1'-0"



SEDIMENTATION PIT SECTION
 SCALE: 3/4" = 1'-0"

REVISED CONSTRUCTION PRINT

This Print is Released For Construction
 SUPERSEDING ALL OLD PRINTS
 NOTE NEW REVISION
 DESTROY ALL OLD PRINTS
 DATE: JAN 13 1987
 BY: [Signature]
 RUNKER MATERIALS CORP.
 ENGINEERING DEPT.

- NOTE:**
- 1) ALL CONCRETE CONSTRUCTION JOINTS TO HAVE WATER STOP.
 - 2) ALL FILL TO BE THOROUGHLY COMPACTED.
 - 3) WATER STOP TO BE CAST IN UPPER LIP OF PRECAST VAULT.

M-210-215

DATE	REVISION	REMARKS	INITIAL
	1	DESIGNED BY: [Signature]	[Signature]
	2	CHECKED BY: [Signature]	[Signature]
	3	DATE: 5/15/86	
		CHECKED BY: [Signature]	[Signature]
		DATE: [Blank]	
		DATE: [Blank]	

SEC. Y. CONT. SLAB ANCHORAGE
 SCALE: 1/2" = 1'-0"

M-210-215

M-210-213

A hand-drawn sketch of a large industrial or institutional complex, possibly a factory or government building. The drawing shows multiple large rectangular buildings, a central courtyard area, and a prominent structure on the left that resembles a bridge or a large gate. The sketch is oriented vertically on the page.

SECONDARY CONTAINMENT LIKE VOLUME: (3.0% CONTAINMENT)

- $2000 \text{ gal.} \times 100\% \times 1 \text{ ft}^3 / 7.48 \text{ gal} = 345 \text{ ft}^3$
- WALL HEIGHT: 2 FT MIN. $\therefore 345 / 2 = 174 \text{ ft}^2$ of GLASS AREA REQ
- PROVIDED GLASS AREA OF $201.0' \times 10.10' \text{ (INTERIOR)}$
- $200 \text{ ft}^2 > 174 \text{ ft}^2$ OK

PLANT LAYOUT

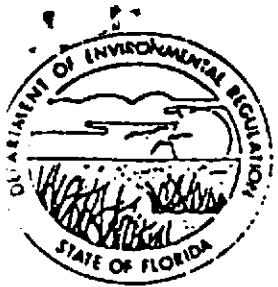


EXHIBIT A

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400
Lawton Chiles, Governor

RECEIVED
November 9 1993
DEPT. OF ENVIRONMENTAL REGULATION
TALLAHASSEE, FLORIDA
WEST PALM BEACH

NOTICE OF INTENT TO USE THE GENERAL PERMIT TO
CONSTRUCT/OPERATE A SOIL THERMAL TREATMENT FACILITY

INSTRUCTIONS: Please provide all information as requested below. For stationary facilities submit the original and four copies of this notice of intent application along with site location map, process flow chart drawings of the treatment facility, and groundwater monitoring plan to the appropriate district office, and one copy of the groundwater monitoring plan to the Bureau of Waste Cleanup. For mobile units submit applicable information to the Bureau of Waste Cleanup, Florida Department of Environmental Regulation, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

Type: Stationary X Mobile General Permit No.: 5013-195017

Name of Facility: RINKER MATERIALS CORPORATION County: DADE

Facility Address: 1200 NW 137 AVENUE MIAMI, FLORIDA 33182

Latitude 25 ° 46 ' 48 " N Longitude 80 ° 25 ' 10 " W

Telephone Number: 305-221-7645

Name of Owner(s): RINKER MATERIALS CORPORATION

Owner(s) Address if different from above: SAME

Department of Environmental Regulation Air Permit Number: A013-233208

Expiration Date: January 15, 1995

Length of primary chamber (ft): 80ft.

Heat generation capability (BTU/hr): 40mm

Capacity of facility at a 25 minute retention time
(yd³/hr): or (tons/hr): 40

Operating temperature of primary chamber (°F): 1000° Discharge

Estimated average volume of soil to be processed (yd³/mth): 5,000 To 29,000

Covered storage area (ft²): 30,000 Height of cover (ft): 45'

Floor construction (cement, asphalt, etc.): Cement

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

ENFORCEMENT TELEPHONE LOG

CASE NAME: Rinker Materials Corp. DATE: 11/5/93 TIME: 1:30 p.
CONTACT: Tom Conrardy, P.E. OF: DEP/W/Up/PA11 CALLER/
WAS CALLED
PHONE: SC 278-0190

DISCUSSION:

- Question for T. Conrardy via speaker phone →
Would a new "Notice of Intent" to include
PCB's mean a whole new application or just a
modification?

A modification would be appropriate, according to Tom C.
PREPARED BY: Paul Whyte

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

ENFORCEMENT MEETING DOCUMENTATION

#5013-195017

Attendees: (See attached list)

Location: FDSP/WPB Date: 11/5/93 Time: 1:00 p.

Subject: Rinker Materials Corporation - Soil Thermal

Meeting requested by: Mike Vordenau, Cement Division

Meeting Objectives: Pre application meeting to discuss PCB management on the site in accordance with revisions to Ch. 17-736, FAC.

Notes:

- 17-775, FAC. was amended to allow PCB Soil Thermal treatment.
- Air permit has been issued. Amended TP to be incorporated in an amendment.
- Leachate collection to be done; tank to be moved outside of the building.

- drummed material operation

Agreements/Conclusions Reached:

- Called T. Conway about clarification of amendment (modification vs. new permit). App. expiration date to remain the same.
- Ref. must be made to 4H. Procedure; gw monitoring to include PCB's. Records to be kept.

- Form to be submitted + \$500.00

Follow-up Actions/Dates:

- Rinker to submit permit next week. (Tuesday) (modification)
- Copy of permit to be mailed to DEP/DRI (BAC)

Prepared by:

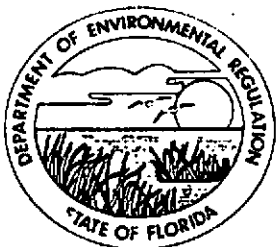
Paul W. Keyser
(Sign)

MEETING ATTENDANCE

DATE: 11/5/93
COMPANIES: Rinker Materials
AGENCIES FDEP

NAME	REPRESENTING	TELEPHONE NO.
<u>Paul Wierzbicki</u>	<u>FDEP/WPB</u>	<u>407/433-2650</u>
<u>LEE MARTIN</u>	<u>" "</u>	<u>"</u>
<u>Michael D. VARDEN</u>	<u>RINKER MATERIALS</u>	<u>3DS-221-7645</u>

Preapplication mtg to discuss modifications to
general permit WRT PCB soils and changes in
process. also discussed new raw materials.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

May 6, 1993

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. James S. Jenkins, III
Rinker Material Corporation
Post Office Box 650679
Miami, Florida 33265-0679

Dear Mr. Jenkins:

Re: Amendment of Permit No. AC13-187599
Stone Dryer Modification

RECEIVED
93 MAY 21 PM 2 02
FLA. DEPARTMENT OF
ENVIRONMENTAL REG.
WEST PALM BEACH

The Department is in receipt of Mr. John Koogler's August 13, 1992, and October 29, 1992, letters requesting that the referenced permit be amended. Mr. Koogler requested that: the compliance testing requirements be clarified; that the permittee be allowed to substitute operating parameters for the incinerator destruction efficiency tests; that EPA Method 25A be used to measure volatile organic compound (VOC) emissions, and that the facility be allowed to treat polychlorobiphenyls (PCBs) contaminated soils. These requests are acceptable, with conditions. Additional changes pursuant to the recent amendment of the Department's air pollution control regulations that incorporated specific standards for soil thermal treatment facilities are also being made to this permit. Construction permit No. AC13-187599 is being reissued to incorporate these amendments and changes. Also, the expiration date is being extended to protect your rights to petition for a hearing on the reissued permit.

A person whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this amendment. Petitions filed by other persons must be filed within 14 days of receipt of this amendment. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The Petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department Permit File Number and the county in which the project is proposed;

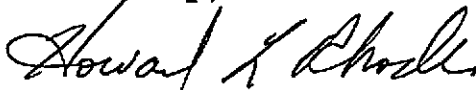
Mr. James S. Jenkins, III
Amendment of AC13-187599
Page Two

- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed action;
- (d) A statement of the material facts disputed by Petitioner, if any;
- (e) A statement of facts which petitioner contends warrant reversal or modification of the Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and
- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this amendment. Persons whose substantial interests will be affected by any decision of the Department with regard to the application have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 14 days of receipt of this amendment in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, F.S., and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-5.207, F.A.C.

A copy of this letter shall be filed with the referenced permit and shall replace the original permit.

Sincerely,

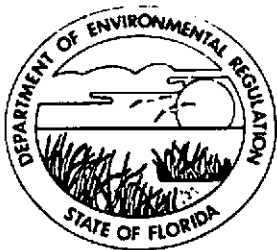


Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/WH/plm

Attach: Permit No. AC13-187599

cc: Isidore Goldman, SED
Patrick Wong, DERM
John Koogler, P.E.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

PERMITTEE:
Rinker Materials Corporation
P. O. Box 650679
Miami, Florida 33265-0679

Permit Number: AC13-187599A
Expiration Date: June 30, 1993
County: Dade
Latitude/Longitude: 25°46'48"N
80°25'10"W
Project: Modification of the
Stone Dryer

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-212 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Modify the existing stone dryer system to decontaminate up to 40 TPH of petroleum contaminated soil. Major components of the system are Gencor Ultraflame low excess air oil burners for the existing 7 ft. diameter by 80 ft. long rotary dryer, an 85% efficient Joy-Western multicyclone, a 99.9% efficient Micropul baghouse with 3,366 sq. ft. of cloth area, a 99.5% efficient natural gas fired IT/McGill afterburner, two heat exchangers for energy recovery, a raw material gallery controlled with a Micropul baghouse that discharges approximately 500 acfm at 400°F through a 1.0 ft. square stack that is 45 ft. high, material handling equipment (screens, inclined belt feeders, bucket elevator, crusher, and stacker), fuel systems (used petroleum oil meeting the provisions of 40 CFR 266, Subpart E, propane, natural gas, and No. 2 fuel oil for the dryer, and natural gas and propane for the afterburner), a by-pass stack to be used only when the kiln is drying stone, and associated equipment. Air pollutants from the dryer are discharged in approximately 36,500 acfm of 800°F flue gases through a 4.5 ft. diameter by 80 ft. high stack.

This system is located at the permittee's Portland cement manufacturing plant at 1200 Northwest 137th Avenue, Miami, Dade County, Florida 33265-0679. The UTM coordinates of this site are Zone 17, 558.2 km E and 2851.3 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

Attachments are listed below:

1. Application received Dec. 10, 1990.
2. Rinker's letter dated Feb. 22, 1991.
3. Environmental Quality Management, Inc. letter dated Mar. 5, 1991.
4. Environmental Quality Management, Inc. letter dated May 8, 1991.
5. DERM letter dated Jun. 27, 1991.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under the conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. a description of and cause of non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

GENERAL CONDITIONS:

which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

- a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include:
 - the date, exact place, and time of sampling or measurements;

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

GENERAL CONDITIONS:

- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

Miscellaneous

1. Part of this permit consists of the 14 General Conditions. The following index of the Specific Conditions of this permit is provided for convenience.

<u>Purpose of Specific Conditions</u>	<u>Specific Condition Numbers</u>
Miscellaneous	1 - 2
Construction Requirements	3 - 5
Emission Restrictions	6 - 11
Operation Requirements	12 - 25
Compliance Requirements	26 - 29
Administrative Requirements	30 - 34

2. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapter 17-296 and 17-297, F.A.C., or any other requirements under federal, state, or local regulations. The permittee is also required to comply with F.A.C. Rule 17-775 and any applicable county regulation which may include requirements for a county operation permit.

Construction Requirements

3. The construction of this facility shall reasonably conform to the plans and schedule submitted in the application.

4. The stack sampling facilities must comply with Rule 17-297.345, F.A.C.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

SPECIFIC CONDITIONS:

5. The facility shall be equipped with a means to measure the pressure drop across the particulate matter air pollution control device and continuous emissions monitors and recorders for hot zone temperature and carbon monoxide concentration (Rule 17-296.415(1)(c), F.A.C.).

Emission Restrictions

6. Particulate matter (PM) and lead emissions from the dryer shall not exceed any of the following limits (Based on data in the application and Rule 17-296.415(2)(b), F.A.C.):

- (A) 0.04 grains PM per dry standard cubic foot.
- (B) 3.3 pounds PM per hour (max.), 1.0 pounds PM per hour (avg.).
- (C) 4.38 tons PM in any 12 consecutive month period.
- (D) 0.13 pounds lead per hour.

7. Particulate matter emissions from the fugitive dust baghouse shall not exceed 0.02 grains/dscf, nor 0.5 lbs/hr. Visible emissions from any part of the process shall not exceed 5 percent opacity.

8. Carbon monoxide emissions shall not exceed 100 parts per million by volume, dry, during any 60 consecutive minute period (Rule 17-296.415(1)(b), F.A.C.).

9. Visible emissions from the afterburner stack shall not exceed 5 percent opacity (Rule 17-296.415(2)(a), F.A.C.).

10. Reasonable precautions shall be taken to minimize uncontrolled particulate matter emissions (Rule 17-296.310, F.A.C.). These provisions are applicable to any source, including vehicular movement, transportation of materials, and industrial related activities such as loading, unloading, storing, and handling. Before and after thermal soil treatment is accomplished, unconfined emissions of particulate matter from the soil shall be controlled by the application of water and/or containment (Rule 296.415(3), F.A.C.).

11. Operation of this facility shall not result in the emissions of air pollutants which cause or contribute to an objectionable odor (Rule 17-296.320, F.A.C.).

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

SPECIFIC CONDITIONS:

Operation Requirements

12. The system shall be properly operated and maintained (F.A.C. Rule 17-210.300(2)). No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly (F.A.C. Rule 17-210.650). The afterburner must be in service any time the stone dryer is used to decontaminate soil. The use of the afterburner is not required when the dryer is used to dry stone. In case of excess emissions resulting from a malfunction, the permittee shall notify the Dade County Department of Environmental Resources Management and the Department's Southeast District office within 1 working day of the cause and duration of the upset. If requested, the permittee shall submit a full written report on the malfunction. (Rule 17-210.700, F.A.C.).

13. The facility shall only treat petroleum contaminated soil as defined in F.A.C. Rule 17-775.200(9), (F.A.C. Rule 17-296.415), whose metal concentrations do not exceed the limits shown in Table I of F.A.C. Rule 17-775.400(3).

14. Soil containing more than 1.4 percent petroleum (daily average) products shall not be treated in this facility unless it is processed at a rate less than 40 TPH and potential VOC emissions do not exceed 22.8 pounds per hour.

15. This facility may treat polychlorobiphenol (PCB) contaminated soil. Any soil containing PCB must meet all the requirements of F.A.C. Rule 17-775.410(6). The permittee shall maintain a log that shows the PCB content of any soil containing used oil, hydraulic oil, and/or mineral oil; the source of the PCB contaminated soil; the tons of PCB contaminated soil treated; the PCB content of the oil that contaminated the soil; the quantity of PCBs in each batch of soil that is treated; and the total amount of PCBs treated during the preceding 12 month period. Emissions of PCBs from the stack shall not exceed 154 pounds in any consecutive 12 month period. The cumulative weight of emissions shall be calculated using either of the following methods:

- (a) The weight of PCBs entering the kiln shall be assumed to be the weight emitted.
- (b) The weight of emission shall be calculated using the weight entering the kiln with adjustment for documented destruction in the facility by a test program conducted by the permittee that is approved by the Department.

Method (a) shall be used until a destruction rate has been established on this system by stack test. Test protocol and methods

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

SPECIFIC CONDITIONS:

to be used in determining destruction efficiency shall be submitted to the Department for approval. Method (b) shall not be used until the test results have been reviewed and accepted by the Department.

16. The input rate of petroleum contaminated soil to the facility shall not exceed 40 tons per hour. Material entering the kiln cannot be larger than 2 inches in diameter. The permittee shall have the means of determining feed or production rates of the facility on site.

17. The unit shall not be operated in a manner that creates a nuisance.

18. This unit shall be allowed to operate continuously, 24 hours per day, 7 days per week, 52 weeks per year.

19. The input of petroleum contaminants in the soil into the facility shall not exceed 1120 pounds per hour (daily average).

20. The dryer is authorized to burn up to 27.4 MM Btu/hr of waste oil (193 GPH) containing a maximum of 0.4 percent sulfur and 500 ppm lead, No. 2 distillate oil (193 GPH) containing a maximum of 0.5 percent sulfur, and propane (180 CFM)/or natural gas (460 CFM). The maximum fuel oil consumption shall not exceed 769,459 gallons in any 12 month period.

21. The fume incinerator (afterburner) is authorized to burn up to 15.0 MM Btu/hr of natural gas (250 CFM) or propane(100 CFM). The fume incinerator shall be in service any time the stone dryer is being used to process material containing contaminated soil. The by-pass stack must be closed when the unit is processing contaminated soil.

22. Contaminated soil shall not be treated by the facility unless the afterburner is operating at a minimum temperature of 1600 degrees Fahrenheit, and a minimum retention time of 0.5 seconds. If the permittee can document that the retention time of the flue gases in the afterburner is 1 second or more, the afterburner temperature may be reduced to 1500 °F (Rule 17-296.415(1)(a), F.A.C.).

23. All emission monitoring equipment shall be properly installed, calibrated, operated, and maintained in accordance with the manufacturer's requirements for that instrument.

24. Pressure drop across the particulate matter air pollution control device shall be recorded hourly and the temperature and

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

SPECIFIC CONDITIONS:

carbon monoxide concentration of the hot zone shall be recorded continuously (Rule 17-296.415(1)(c), F.A.C.).

25. Use of the existing cement kiln to decontaminate soil shall cease when the stone dryer begins operation as a soil decontamination unit or when this construction permit expires, whichever event occurs first.

Compliance Requirements

26. The Southeast District and Dade County Department of Environmental Resources Management shall be notified in writing at least 15 days in advance of any formal compliance test to be conducted on this facility. The notification shall give the date, time, place, and contact person for the test (Rule 17-297.340(1)(i), F.A.C.).

27. This facility shall be tested (EPA test methods are specified in 40 CFR 60, Appendix A, revised July 1, 1992) at 90 - 100% of its permitted process rate within 30 days of placing it in service concurrently for:

- (A) Particulate matter (PM) emissions by EPA Methods 1, 2, 3, 4, and 5.
- (B) Visible emissions by EPA Method 9.
- (C) Carbon monoxide (CO) emissions by averaging each hour of the readings from the CO continuous emission monitor during the PM test periods.
- (D) Afterburner temperature by averaging each hour of the temperature readings from the continuous temperature monitor during the PM test period.
- (E) Afterburner residence time using the test data collected by EPA Methods 1 and 2.
- (F) Fuel oil sulfur limits based on analysis referenced in 40 CFR 60.17 or other methods after Department approval. A certified analysis by the fuel oil supplier will be acceptable.
- (G) Contaminated soil analysis for volatile organic aromatics (VOA), total recoverable petroleum hydrocarbons (TRPH), polynuclear aromatic hydrocarbons (PAH), volatile organic halocarbons (VOH), and metals as required by Rule 17-775.410, F.A.C.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

SPECIFIC CONDITIONS:

(H) The initial compliance test and any test data submitted with an application for permit to operate (every 5 years) shall include analysis of the filter and impinger catch for arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver along with similar analysis of the contaminated and treated soil processed during the test.

28. Compliance tests results shall be submitted to the Southeast District and Dade County within 45 days of the test.

29. When the Department, after investigation, has good reason to believe that any applicable emission standard or condition of this permit is being violated, it may require the owner or operator of the facility to conduct compliance tests which identify the nature and quantity of pollutant emissions from the plant and to provide a report on the results of said tests to the Department (Rule 17-297.340(2), F.A.C.).

Administrative

30. The permittee shall maintain a daily log that shows the date, operation time, pressure drop across the PM control device, processing rate, type and quantity of fuel consumption in the dryer and afterburner, and operation problems. These records shall be maintained for a minimum of 3 years.

31. The permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices, all soil analysis required by Rule 17-775, F.A.C., and all other information required by rule or this permit, recorded in a permanent form suitable for inspection. The file shall be retained for at least 3 years following the date of such measurements, maintenance, reports, and records.

32. The permittee shall submit to Southeast District each calendar year, on or before March 1, an annual operation report for this facility for the preceding calendar year containing at least the following information pursuant to Subsection 403.061(13), F.S.:

- (A) Annual amount of material and/or fuels utilized.
- (B) Annual emissions (note calculation basis).
- (C) Annual hours of operation.

PERMITTEE:
Rinker Materials Corporation

Permit Number: AC13-187599
Expiration Date: June 30, 1993

SPECIFIC CONDITIONS:

- (D) Any changes in the information contained in the permit.
- (E) All compliance test reports for the preceding year.
- (F) Temperature and CO exceedance reports for the year.

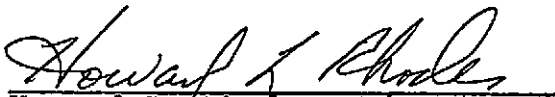
33. The permittee may request, in writing, that the permit(s) for this facility be modified to authorize the treatment of materials not meeting the specifications in F.A.C. Rule 17-775. The request to the Division of Air Resources Management shall include the appropriate processing fee for a modification, the history of the soil to be treated, an analysis of the contaminants suspected to be in the soil, an estimate of the emissions from the unit while processing the soil, and calculations showing that the ambient air impact from the unit will not exceed the Air Toxic Reference Concentration for any toxic pollutant. Public notice may be required by the Department as part of the review to modify the permit(s). The Department will approve or deny each request in writing on a case-by-case basis.

34. The permittee, for good cause, may request that this construction permit be extended. Such request shall be submitted to the Bureau of Air Regulation (BAR) prior to 60 days before the expiration of the permit (Rule 17-4.090, F.A.C.).

35. An application for an operation permit must be submitted to the Southeast District at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the Applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (Rule 17-4.220, F.A.C.).

Issued this 17 day
of May, 1993

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Howard L. Rhodes, Director
Division of Air Resources
Management



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 • FAX 377-7158

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DEPT. OF ENVIRONMENTAL REG.
WEST PALM BEACH

KA 263-92-02

October 29, 1992

Mr. Willard Hanks
Division of Air Resources
Florida Department of
Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

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Division of Air
Resources Management

Subject: Rinker Materials Corporation
Dade County, Florida
Permit AC13-187599 - Soil Remediation Unit
Proposed Permit Amendments

Dear Mr. Hanks:

This is a follow-up of my letter to you dated August 13, 1992. In that letter, I requested a clarification to one of the Specific Conditions of the referenced air construction permit and amendments to three other Specific Conditions. The amendments were based upon changes that were proposed to Air Rules contained in Chapter 17-2 of the Florida Administrative Code. Subsequent to that letter, Chapter 17-2, FAC, was amended to incorporate the changes anticipated in my letter of August 13, 1992. Additionally, Chapter 17-2, FAC, has been renumbered to Chapter 17-296, FAC.

Another requirement imposed by amendments to Chapter 17-296, FAC, is the requirement at 17-296.415(1)(d) that facilities intending to process soil contaminated with non-hazardous levels of PCBs have an air permit expressly authorizing the treatment of such soils.

By this letter, I would like to reaffirm the amendments requested to Specific Conditions 3, 5 and 25 of the referenced air construction permit based upon the amendments that have been introduced to Chapter 17-296, FAC, related to the time-temperature relationships for afterburners associated with soil

Mr. Willard Hanks
Florida Department of
Environmental Regulation

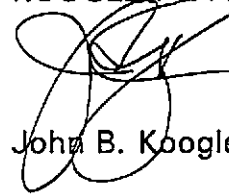
October 29, 1992
Page 2

remediation units. Also, I would like to request that a Specific Condition authorizing the processing of soils containing non-hazardous level PCBs be added to Rinker's permit. The attached report entitled, *Analysis of Allowable PCB Process Inputs for Compliance with State of Florida Ambient No-Threat Levels*, provides an analysis of the thermal treatment of PCB contaminated soil at the Rinker facility and proposes limits for the treatment of these soils.

If there are any questions regarding these matter, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:wa
Enc.

c: Mr. Mike Vardeman, Rinker
Mr. Ronald Hawks, Environmental Quality
Management, Inc.

Handwritten note:
D. Shook, SE, Inc.
7224 Q. LERIN



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DEPT. OF ENVIRONMENTAL REG.
WEST PALM BEACH

**ANALYSIS OF ALLOWABLE PCB PROCESS
INPUTS FOR COMPLIANCE WITH STATE
OF FLORIDA AMBIENT NO-THREAT LEVELS**

for

Rinker Materials

by

Ronald L. Hawks
Environmental Quality Management, Inc.
Cedar Terrace Office Park, Suite 250
3325 Chapel Hill Boulevard
Durham, North Carolina 27707

and

John Koogler
Koogler and Associates
Gainesville, Florida

October 1992

COMPLIANCE WITH NO THREAT AMBIENT LEVELS FOR PCB EMISSIONS DURING THERMAL SOIL TREATMENT

A review of process operating conditions and an air quality impact analysis of the soil treatment unit at Rinker Materials indicates that compliance with the guidance No Threat Level (NTL) established by Florida Department of Environmental Regulation (DER) for PCB can be achieved processing soils containing nonhazardous PCB contaminated transformer oils. Compliance with short-term NTL may be obtained by limiting maximum process rates and contamination in the soil to be treated. Compliance with annual NTL can be achieved by establishing annual PCB emission limits (i.e., lb/yr).

Long-Term Exposure

A dispersion model of the soil treatment unit was conducted using EPA ISCST ver. 92062 with one year (1989) of Miami meteorological data. The model was run using rural, flat terrain with building dimensions included for downwash (cavity) effects. Back calculation using property boundary distances and assuming a NTL of $8.3 \times 10^{-4} \mu\text{g}/\text{m}^3$ (annual average), the maximum annual average hourly emission rate of PCB was established. The maximum concentration at the property boundary occurs at 280° *westerly* and a distance of 1114 meters. The calculated allowable emission rate is 0.01779 lb/h or 155.9 lb/yr.

The afterburner on the soil treatment unit is designed to operate at 1500° F (815° C) and have a residence time of > 2 s. Data published by Joseph Tessitore in Pollution Engineering, March 1990 and Barry Dellinger in Review of Laboratory Systems Developed for Studying Gas Thermal Decomposition (1984) indicate PCB thermal destruction of at least 80 percent at these conditions.

In addition, Rinker has observed that a high level of organic pyrolysis and oxidation occurs in the dryer and therefore complex organic molecules such as PCB are thermally degraded before being subjected to the afterburner. This greatly increases the effective residence time at which the molecules are subjected to high temperature.

With a destruction efficiency of 80 percent, Rinker would be able to treat an input weight of soils containing up to 779.5 lb/yr of PCB without exceeding the annual NTL. For example, assuming an annual average maximum of 2 ppm PCB in contaminated soil as a result of mineral oil containing PCB at ≤ 49 ppm, Rinker could process 194,880 tons/yr. Since the mineral oil content of soils may vary, the annual allowable soil volume may be variable. Rinker therefore proposes to track PCB weights by maintaining records of soil PCB content (ppm) and tons of soil processed. The accumulative emission of PCB can be accurately determined and the annual emission limit not exceeded.

The equation for each batch treatment would be:

$$ER(lb) = PCB \text{ conc. (ppm)} \times 10^{-6} \times 2000 \frac{lb}{ton} \times tons \times (1 - 0.80)$$

An example process weight for several PCB soil contents is attached.

In order to comply with emission limitation Rinker proposes to:

1. Analyze mineral oil contaminated soils for PCB and report results to an accuracy of one-tenth ppm.
2. Maintain process records for each batch showing tons processed and PCB concentration.
3. Calculate PCB emissions for each batch and maintain a calculated accumulated emission for each calendar year.
4. Rinker agrees to cease processing nonhazardous PCB contaminated soils for the balance of any calendar year when an accumulated emission of 155 lb is reached.

EXAMPLE OF SOIL PROCESS RATE LIMITS BASED ON PCB CONTENT

Average PCB content soil, ppm	Annual maximum process rate, tons/yr
0.5	779,520*
1.0	389,760*
1.5	259,830
2.0	194,880

*Total annual process rate would exceed allowable permit tonnage of 350,400 tons/yr.

Short-Term Exposure

The short-term no-threat limits for PCB are $5.0 \mu\text{g}/\text{m}^3$ (8-h) and $1.2 \mu\text{g}/\text{m}^3$ (24-h). Using the ISCT dispersion model, the maximum allowable emission rate for the highest 8-h average is 3.635 lb/h and occurs at the property boundary at 160° and at a distance of 389 meters. This would be equivalent to 227.2 ppm in soil at a process rate of 40 tons/h. It would be physically impossible to reach this contamination level and a maximum limit of 10 ppm in soil would be proposed for protection of the standard.

The maximum allowable emission rate for the highest 24-h average is 1.36 lb/h and occurs the property boundary at 160° at a distance of 389 meters. This would be equivalent to 85.0 ppm in soil. This also would not be physically possible and a 10 ppm maximum limit would be adequate for protection of the standard.

COMPARISON OF ALLOWABLE PCB CONCENTRATION TO MEET AMBIENT NO-THREAT LEVEL

Averaging time	Emission rate, lb/h	No destruction		80 percent destruction	
		Process rate, tons/h	ppm in soil	Process rate, tons/h	ppm in soil
8 h	3.635	40	45.4	40	227.2
24 h	1.36	40	17	40	85.0
Annual	0.01779	77,952*	1.00	389,760*	1.0

*Annual process rate at stated PCB concentration.