



ENVIRONMENTAL RESOURCES MANAGEMENT
POLLUTION CONTROL DIVISION
33 S.W. 2nd AVENUE
SUITE 800
MIAMI, FLORIDA 33130-1540
(305) 372-6817

June 15, 2004

Mr. Scott Quaas
Environmental Manager
Tarmac America, LLC
455 Fairway Drive
Deerfield Beach, FL 33441

CERTIFIED MAIL NO. 7000 1670 0005 4645 0177
RETURN RECEIPT REQUESTED

RECEIVED

JUN 23 2004

DEPT OF ENV PROTECTION
WEST PALM BEACH

Re: Request for fly ash trial burn sent by the State on June 3, 2004, for the Pennsuco Cement facility located at, near, or in the vicinity of 11000 NW 121 Way, Medley, Florida.

Dear Mr. Quaas:

The Pollution Remediation Section (PRS) of the Department of Environmental Resources Management (DERM) has reviewed the referenced request received on June 3, 2004, modifying the previous trial burn request, dated December 3, 2003, and received January 15, 2004. The referenced request addresses DERM's March 4, 2004 letter (copy attached) and proposes the following:

1. Receive \pm 1,000 tons of wet fly ash from the Indiantown power plant, for a trial burn.
2. Fly ash will be delivered to the referenced facility by dump truck on a "just in time" schedule; i.e., fly ash will not be stored on site or unloaded to the ground at any time.
3. If for any reason the fly ash cannot be used for the trial burn upon arrival at the site, it will not be unloaded and will be trucked back to the source facility.

Based on the above, the PRS does not object to a fly ash trial burn subject to the following:

1. Prior approval from the DERM Air Quality Management Division is obtained.
2. The transfer of fly ash from the dump truck to the process equipment shall not result in the discharge of ash.
3. DERM shall be notified in writing (or by facsimile at 305-372-6982) three (3) working days in advance of the trial burn.

If you have any questions regarding this letter, please contact Mr. Carlos L. Hernandez, P.E. of the Pollution Remediation Section at (305) 372-6700.

Sincerely,

Wilbur Mayorga, P.E., Chief
Pollution Remediation Section

Cc: Joe Lurix, FDEP-WPB
Roberto Abrahante, DERM
Mallika Muthiah, DERM
CJ Johnson, VFL



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March 4, 2004

Mr. Scott Quaas
Environmental Manager
Tarmac America, LLC
455 Fairway Drive
Deerfield Beach, FL 33441

CERTIFIED MAIL NO. 7000 1670 0005 4639 8134
RETURN RECEIPT REQUESTED

Re: Application for Permit Determination for a Resource Recovery and Management Facility (RR&MF) dated December 3, 2003, for the Pennsuco Cement facility located at, near, or in the vicinity of 11000 NW 121 Way, Medley, Florida.

Dear Mr. Quaas:

The Pollution Remediation Section (PRS) of the Department of Environmental Resources Management (DERM) has reviewed the referenced application received on January 15, 2004. Said application was submitted for the following operations/processes:

1. Receive, store, and process \pm 4,000 tons of wet fly ash from the Indiantown power plant, for a trial burn, with chemical/physical properties representative of the data presented in the laboratory report (dated August 2003) submitted with the referenced application.
2. Store \pm 4,000 tons of wet fly ash on bermed open ground for a period of \pm 12 days.
3. Introduce \pm 4,000 tons of wet fly ash, as a raw material into the kiln feed, to manufacture Portland cement clinker (i.e., trial burn).

DERM understands that fly ash is currently used at the referenced facility, and that the proposed actions only represent the use of a new source of fly ash. Consequently, facility operations/processes will not change. However, the data presented in the laboratory report submitted with the referenced application shows that the Toxicity Characteristic Leaching Procedure (TCLP) concentrations for arsenic and lead exceed the cleanup target levels (CTLs) stipulated in Section 24-11.1(2), Code of Miami-Dade County, and the detection limit for Cadmium is above the applicable CTL.

Based on the TCLP data presented in the referenced application, the storage of fly ash from the Indiantown power plant on open ground is not permitted. However, the PRS would not object to a fly ash trial burn if prior approval from the DERM Air Quality Management Division is obtained and a detailed plan is subsequently submitted to the PRS for review and approval that includes the following:

1. A sampling report that includes results, total and Synthetic Precipitation Leaching Procedure (SPLP), of the proposed fly ash for ammonia, eight (8) Resource Conservation and Recovery Act (RCRA) metals, beryllium, vanadium, iron, and aluminum. If the total concentration of a RCRA metal exceeds its corresponding total metal concentration in Table B, Chapter 62-713, Florida Administrative Code (F.A.C.), then a TCLP test shall be required for the metal.