



**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT  
8800 BAYMEADOWS WAY WEST, SUITE 100  
JACKSONVILLE, FLORIDA 32256

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GOVERNOR

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LT. GOVERNOR

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SECRETARY

*Sent by Electronic Mail – Received Receipt Requested*

**PERMITTEE**

Suwannee American Cement, L.L.C.  
5117 US Highway 27  
Branford, Florida 32008

Air Permit No. 1210465-032-AC  
Permit Expires: August 4, 2015

Authorized Representative:  
Tom Messer, Plant Manager

Branford Cement Plant  
Air Construction Permit  
Gypsum Conveyor

This is the final air construction permit, which authorizes the installation at EU007 of a gypsum conveyor system consisting of: a feeder to receive the gypsum material, a belt conveyor to receive the material from the feeder and feeder pans that will take the material from the belt conveyor and dump the gypsum material on top of the clinker and lime bed prior to entry into the finish mill. In addition, the description of EU007 is revised to clarify that the unit includes both unenclosed and totally enclosed transfer points. The proposed work will be conducted at the Branford Cement Plant, which is a Portland Cement Plant (Standard Industrial Classification No. 3241). The facility is located in Suwannee County at 5117 US Highway 27 in Branford, Florida. The UTM coordinates are Zone 17, 321.4 km East, and 3315.9 km North. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections.

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

**AIR CONSTRUCTION PERMIT**

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Executed in Jacksonville, Florida



Richard S. Rachal III, P.G.  
Acting Program Administrator  
Waste & Air Resource Management

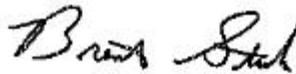
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 8/4/2014 to the persons listed below.

Tom Messer, Plant Manager- Suwannee American Cement, LLC ([tomm@suwanneecement.com](mailto:tomm@suwanneecement.com))  
Max Lee, Ph.D, P.E., Koogler & Associates ([mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com))  
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Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.



\_\_\_\_\_  
(Clerk)

8/4/2014  
(Date)

## SECTION 1. GENERAL INFORMATION

### FACILITY AND PROJECT DESCRIPTION

#### Existing Facility

This facility consists of a portland cement plant and associated quarry, and raw material and cement handling operations. The plant will combine raw materials and utilize a preheater/precalciner kiln with in-line raw mill to produce clinker. The clinker will be milled and combined with gypsum to produce portland cement. The plant will have a capacity of 210 tons per hour of material fed to the preheater (dry basis), 120 tons per hour of clinker production, and 150 tons per hour of portland cement production. Annual production will be limited (on a rolling 12-month basis) to 1,684,578 tons per year of material fed to the preheater (dry basis), 965,425 tons per year of clinker production, and 1,191,360 tons per year of portland cement production. Fuels allowed to be used in the pyroprocessing system are natural gas, coal, and petroleum coke. The plant will also include a coal processing operation that will crush coal and petroleum coke and will have a monthly processing capacity of 13,360 tons of coal and petroleum coke.

EU	Brief Description	Emission Point(s)
001	1000 TPH primary crusher and associated unenclosed belt conveyors to raw material storage – fugitive emissions	Fugitive
002	Raw material processing operations controlled by baghouses	E-28, E-34, G-07, H-08 & U02-01
003	Raw material processing – unenclosed conveyor transfer points – D conveyors	Fugitive
004	In line kiln/raw mill controlled by baghouse – main stack	E-21
005	Clinker cooler controlled by ESP	K-15
006	Clinker and cement processing operations controlled by baghouses	L-03, L-06, L-25, M-08, M-09, N-09, N-12, N-36, N-91, Q-14, Q-17, P-03, P-11 & Q-24
007	Clinker and cement processing –conveyor transfer points – M conveyors	Fugitive
008	Coal mill and coal transfer system controlled by baghouses	S-17 East, S-17 West & S-21
009	Unenclosed coal conveying equipment – S conveyors	Fugitive
010	Emergency generator set <sup>1</sup>	N/A

<sup>1</sup> Emissions unit 010 is exempt from permitting (exempt emissions unit) pursuant to Rule 62-210.300(3)(a) 35, If burning only one (1) type of fuel, the collective annual amount of fuel burned by all units claiming this exemption at the same facility shall not exceed 2,700 gallons of gasoline, 32,000 gallons of diesel fuel, 144,000 gallons of propane, or 4.4 million standard cubic feet of natural gas. The owner or operator should maintain records of annual fuel consumption of the generator to verify that this emissions unit remains exempt.

## SECTION 1. GENERAL INFORMATION

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### Proposed Project

This project is for the installation of a gypsum conveyor system for EU007. This project will add the following **emissions points**.

<b>Facility ID No. 1210465</b>	
<b>ID No.</b>	<b>Emission Unit Description</b>
007	Clinker and cement processing –conveyor transfer points – M conveyors

The installation of a gypsum conveyor system consisting of: a feeder to receive the gypsum material, a belt conveyor to receive the material from the feeder and feeder pans that will take the material from the belt conveyor and dump the gypsum material on top of the clinker and lime bed prior to entry into the finish mill.

The existing facility, prior to this project, is classified as a major stationary source for purposes of PSD and NESHAP. The proposed gypsum conveyor system is considered to be new equipment for purposes of PSD. The conveying system includes two totally enclosed transfer points. The two conveying system's transfer points are regulated pursuant to 40 CFR 63, Subpart LLL - National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry. SAC will install the conveying system after February 12, 2013 and the totally enclosed transfer points are therefore considered to be "new" for purposes of 40 CFR 63 Subpart LLL. Because these two points are totally enclosed transfer points, they are exempted from emissions testing per NESHAP LLL. The third transfer point is a mobile source transfer point onto the conveyor system. Such transfer points are exempt from NESHAP subpart LLL.

Pursuant to Rule 62-212.400(2)(a)2., F.A.C., the appropriate test for determining whether a major modification will occur for each PSD pollutant as a result of this project is the Baseline Actual-to-Potential Applicability Test for Construction of New Emissions Units. Because potential emissions are less than the significance PSD threshold for PM/PM10/PM2.5 (potential emissions estimated at 10.7 lb/yr), a test for major modification and annual review will not be required.

### FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority & Compliance: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the District.
2. Appendices: The following Appendices are attached as part of this permit:
  - a. Appendix A. Citation Formats and Glossary of Common Terms;
  - b. Appendix B. General Conditions;
  - c. Appendix C. Common Conditions; and
  - d. Appendix D. Common Testing Requirements.
  - e. Appendix E. NESHAP Subpart A General Provisions
3. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
4. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
5. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
6. Source Obligation:
  - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
  - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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7. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
007	Clinker and cement processing – conveyor transfer points – M conveyors

Clinker and Cement Processing (conveyor transfer points- M conveyors) - A network of conveyors that transfer clinker from the clinker silos to cement grinding operations. These conveyor transfer points include both unenclosed and totally enclosed transfer points. Additives are introduced to the clinker on the pan conveyor.

The provisions of 40 CFR 63 Subpart LLL are applicable to the new equipment at this emissions unit.

40 CFR 60 Subpart F, Standards of Performance for Portland Cement Plants (40 CFR 60.60 – 60.66) and 40 CFR 60 Subpart A, revised as of July 1, 1997 have been subsumed by 40 CFR 63 Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry.

Conveying system's transfer points are regulated pursuant to 40 CFR 63, Subpart LLL - National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry. The conveying system will include a new conveying system (constructed after February 12, 2013) and existing transfer points. Totally enclosed transfer points are exempted from emissions testing per NESHAP LLL. Mobile source transfer points onto the conveyor system are not subject to NESHAP subpart LLL

{Permitting note(s): IMPORTANT REGULATORY CLASSIFICATIONS- These emissions units are subject to 40 CFR 63 Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry and 40 CFR 63 Subpart A, General Provisions. These emissions units are also subject to the requirements of the state rules as indicated in this permit, particularly Rule 62-212.400, F.A.C., Prevention of Significant Deterioration.}

#### EQUIPMENT

**A.1. Relation to Other Permits.** The conditions of this permit will supplement and comply with conditions of all existing, valid, Department permits.  
[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

**A.2. Equipment Name.** The permittee is authorized to install a gypsum conveyor system consisting of: a feeder to receive the gypsum material, a belt conveyor to receive the material from the feeder and feeder pans that will take the material from the belt conveyor and dump the gypsum material on top of the clinker and lime bed prior to entry into the finish mill.

[Application No. 1210465-032-AC]

#### PERFORMANCE RESTRICTIONS

**A.3. Process Rate Limitation.** This permit does not change any or establish any new permitting capacities or emissions limits for this EU.

[Note: **For this project the applicant has estimated that the potential to emit from transfer and unloading operations is: PM<sub>10</sub> 10.7 pounds per year.**]

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Definitions - potential to emit (PTE)]

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### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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**A.4. Hours of Operation.** This permit does not change any or establish any new hours of operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

#### EMISSIONS STANDARDS

**A.5. Visible Emissions.** Emissions from the conveying system transfer points are subject to a 10% opacity limit. Because the conveying system transfer points are totally enclosed, they are not subject to Method 22 visible emissions testing per 40 CFR 63.1350(f)(v). In addition, because this transfer point is totally enclosed, the Department waives initial and renewal Method 9 visible emissions testing under 40 CFR 63.1349(b)(2) and the general provisions of 40 CFR 63.7, as well as the Department's rules.

*{Permitting Note: As described above, the transfer point meets the definition of "totally enclosed" in 40 CFR 63.1341: enclosed on all sides, top and bottom. The monitoring requirements in 40 CFR 63.1350(f)(1)(v) state, "Any totally enclosed conveying system transfer point, regardless of the location of the transfer point is not required to conduct Method 22 visible emissions monitoring under this paragraph. The enclosures for these transfer points must be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan." }*

[40 CFR 63.7, 63.1341, 63.1345, 63.1348, 63.1349 and 63.1350(f); and Rule 62-297.310(7), F.A.C.]

#### REPORTING AND RECORD KEEPING REQUIREMENTS

**A.5.** The notification and reporting provisions of 40 CFR part 63, subpart A that apply and those that do not apply are listed in Table 1 of this subpart. If any State requires a notice or report that contains all of the information required in a notification or report listed in this section, the owner or operator may send the Administrator a copy of the notice or report sent to the State to satisfy the requirements of this section for that notification or report.

Each owner or operator subject to the requirements of this subpart shall comply with the notification and reporting requirements in §63.9 and §63.10 as follows:

- (1) Initial notifications as required by §63.9(b) through (d). For the purposes of this subpart, a Title V or 40 CFR part 70 permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b). Permit applications shall be submitted by the same due dates as those specified for the initial notification.
- (2) Notification of compliance status, as required by §63.9(h).
- (3) Within 48 hours of an exceedance that triggers retesting to establish compliance and new operating limits, notify the appropriate permitting agency of the planned performance tests. The notification requirements of §§63.7(b) and 63.9(e) do not apply to retesting required for exceedances under this subpart.

[40 CFR 63.1353(a) & (b)(1), (3), (5), (6); 63.1354(a) & (b)(2); Appendix E, Rule 62-204.800, F.A.C.]

**A.6.** This emissions unit is subject to the attached Combined Appendices A-E requirements.