FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
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JONATHAN P. STEVERSON
SECRETARY

March 6, 2015

Sent by Electronic Mail – Received Receipt Requested

wvoshell@argos-us.com
William Voshell, Environmental Director
Argos USA
3015 Windward Plaza, Suite 300
Alpharetta, GA 30005

Re: Argos USA, Newberry Cement Plant
Facility ID No. 0010087
Clinker Coolers Nos. 1 and 2 (Emissions Units 004 and 011)
Request for Cement MACT Compliance Date Extension

Dear Mr. Voshell:

On November 26, 2014, Department of Environmental Protection (Department) received your initial request[1] for an extension of the rule compliance date for the Clinker Coolers Nos. 1 and 2 subject to the Cement MACT Rule.[2] Specifically, you request an extension from September 9, 2015 to March 31, 2016 for one of the clinker coolers and to September 9, 2016 for the remaining clinker cooler. The Department also received additional information (Letter of Intent) on December 12, 2014.[3] The federal regulations[4] allow for up to a one year extension to comply with MACT standards for purpose of installing controls. The authority to grant such an extension is delegated to the Department, which operates an approved Title V air operation permit program.[5]

On March 8, 2014, Argos USA Corp. (Argos) completed its acquisition of the Thomas A. Baker Cement Plant (ID No. 0010087) located in Newberry, Florida. At this plant, existing Clinker Coolers Nos. 1 and 2 use electrostatic precipitators (ESP) to control particulate matter (PM) emissions. The new Cement MACT Rule requires a continuous demonstration of compliance for the clinker coolers. Based on previous testing, Argos states that it is necessary to upgrade the control technology from ESPs to baghouses to ensure compliance on a continuous basis.

On October 24, 2014, Argos obtained an air construction permit (No. 0010087-052-AC) from the Department authorizing the replacement of the existing ESPs on the clinker coolers with baghouses. Baghouses are generally recognized as the superior technology for removing particulate matter from such gas steams and typically handle process upsets better than ESPs. Argos completed a Letter of Intent with the baghouse equipment supplier dated November 21, 2014. The original extension request included a detailed staggered construction schedule for completing the work. Attachment A of this extension letter includes key construction milestones and provides flexibility to begin work on either Clinker Cooler No. 1 or No. 2.

Given the above information, the request meets the criteria for obtaining an extension of the compliance date from September 9, 2015 to March 31, 2016 for the first clinker cooler and to September 9, 2016 for the remaining clinker cooler. The Department will incorporate the extension along with key milestones and the proposed conditions in Attachment A into the Argos Title V air operation permit for the Newberry Cement Plant

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[1] Argos initial extension request dated 11/26/14.

[2] The Maximum Achievable Control Technology (MACT) standards are specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Portland Cement Manufacturing Industry. See Title 40, Part 63, Subpart LLL of the Code of Federal Regulations adopted and incorporated at Rule 62-204.800(11)(b)48., F.A.C.

[3] Email from William Voshell on 12/12/14 with attached letter dated 12/09/14 providing a signed copy of the Letter of Intent between Argos USA and the contractor (Scheuch GmbH) chosen to conduct the work.

[4] See the NESHAP General Provisions at 40 CFR 63.6(i), adopted and incorporated at Rule 62-204.800(11)(d)1., F.A.C.

[5] See the NESHAP General Provisions at 40 CFR 63.6(i)(4)(i)(A), adopted and incorporated at Rule 62-204.800(11)(d)1, F.A.C..

If you have any questions regarding this matter, please contact me at 850-717-9083.

Sincerely,

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

cc:

William Voshell, Argos (wvoshell@argos-us.com)
Max Lee, Koogler and Associates (mlee@kooglerassociates.com)
Otar Gotsch, Argos (OGotsch@argos-us.com)
Richard Rachal, DEP Northeast District (Richard.Rachal@dep.state.fl.us)

ATTACHMENT A

Proposed Conditions for Draft Title V Operation Permit

1. Compliance Date Extension: Prior to beginning on site construction, the permittee shall notify the Division and Compliance Authority regarding which clinker cooler ESP will be modified first. For the first clinker cooler ESP/baghouse replacement project, the Cement MACT compliance date is extended from September 9, 2015 to March 31, 2016. For the second (next) clinker cooler ESP/baghouse replacement project, the Cement MACT compliance date is extended from September 9, 2015 to September 9, 2016. *{Permitting Note: The preliminary plan is to begin work on Clinker Cooler No. 2 first. So, the Cement MACT compliance date for No. 2 would be March 31, 2016 and for No. 1 September 9, 2016.}* [40 CFR 63.6(i); and Rule 62-204.800(11)(d)1., F.A.C.]

2. Key Milestones: Unless the permittee notifies the Department in advance, the permittee shall meet the following schedule for completing the installation of the control equipment and demonstrating compliance with the Cement MACT requirements for Clinker Coolers Nos. 1 and 2.

Key Milestones	Target Completion Dates	
Clinker Cooler ESP/Baghouse Replacement Project	1st	2nd
Complete Engineering Design of Pollution Control Equipment	03/02/15	03/02/15
Complete Procurement of Control Equipment	10/12/15	10/12/15
Complete Installation of Control Equipment	12/17/15	04/13/16
Complete Acceptance, and Operational Testing of Control Equipment	02/05/16	07/01/16
Complete Cement MACT Performance Testing	03/01/16	08/01/16
Cement MACT Compliance Date	03/31/2016	09/09/2016
Progress Reports	Quarterly	Quarterly

The permittee shall provide advance notice to the Division and the Compliance Authority if it is unable to meet a target in the above schedule and shall identify a new completion date. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]

3. Progress Reports: By September 9, 2015, the permittee shall provide a written report to the Division and the Compliance Authority that summarizes the work completed to date and the work remaining on the ESP/Baghouse Replacement Projects for Clinker Coolers Nos. 1 and 2. Thereafter, the permittee shall provide quarterly written progress reports within 30 days following each calendar quarter and an updated schedule if necessary to the Division and the Compliance Authority. [40 CFR 63.6(i)(10) and (11), Rule 62-204.800(11)(d)1., F.A.C., and Rule 62-4.070, F.A.C.]

4. Cement MACT – Initial Compliance: The permittee shall demonstrate initial compliance with the Cement MACT rule for Clinker Coolers Nos. 1 and 2 in accordance with the applicable requirements of §63.1348 and §63.1349 [40 CFR 1348 and 1349]