Compliance Plan

A. Emission Unit ID No. 014 - Dioxin/Furan (D/F) Emission Limitations

In accordance with Rule 62-213.440(2), Florida Administrative Code (F.A.C.), this compliance plan is being included as a part of the Title V renewal permit for CEMEX Cement, Inc. located at 16301 Ponce De Leon Blvd. in Brooksville, Hernando County, to bring the facility into compliance, and provide assurance of continual compliance, with Dioxin/Furan (D/F) emission limitations in accordance with the requirements of this permit and 40 CFR 63 Subpart LLL - National Emission Standards for Hazardous Air Pollutants (NESHAPs) from the Portland Cement Manufacturing Industry, to which this facility is subject.

According to Rule 62-213.440(2), F.A.C., "the source shall meet measurable and enforceable milestones on no less than a semiannual basis until compliance is achieved and demonstrated to the Department. Each source shall notify the Department in writing, within 15 days after the date specified for completion of each milestone, to include the achievement of compliance, of progress achieved, requirements met, requirements not met, corrective measures adopted and an explanation of any measures not met by the completion date for the milestone or for compliance. All reports shall be accompanied by a certification, signed by a responsible official, in accordance with Rule 62-213.420(4), F.A.C.

This compliance plan applies to Emission Unit ID No. 014 – Cement Kiln No. 2 to provide assurance of compliance with Dioxin/Furan (D/F) emission limits in accordance with the requirements of 40 CFR 63 Subpart LLL during the Raw Mill off operating mode. Kiln No. 2 failed its most recent D/F compliance test on January 18th and 20th 2007, in the Raw Mill off operating mode, and has been subsequently unable to demonstrate compliance with the D/F standard contained in 40 CFR 63.1343(b)(3) in the Raw Mill off operating mode.

1. CEMEX shall not operate Kiln No. 2 in the Raw Mill off mode except as authorized by the Department.

    a. CEMEX shall shut down Kiln No. 2 within 30 minutes after stopping the raw feed to the Kiln No. 2 Raw Mill. Reporting of these shutdowns will be provided in the monthly Compliance Plan Status Report.

    b. CEMEX may operate Kiln No. 2 in the Raw Mill off mode for diagnostic or compliance testing if previously authorized by the Department.

    c. These restrictions shall remain in effect until CEMEX submits and the Agency approves a compliance test that meets the Dioxin/Furan (D/F) emission limits specified in 40 CFR 63 Subpart LLL for Raw Mill off operating mode.

2. CEMEX shall continue to submit Compliance Plan Status Reports on a monthly basis. The reports are due by the 15th of the month and shall continue until completion of the Compliance Plan.

3. CEMEX shall install an Evaporative Cooling System Spray Tower designed to cool the Kiln No. 2 exhaust gas in a manner that will control the formation of Dioxins and Furans and enable compliance with the applicable standard in all operating modes.

4. CEMEX shall adhere to the attached project schedule.

5. CEMEX shall demonstrate compliance with the D/F standard in the Kiln No. 2 Raw Mill off and Kiln No. 2 Raw Mill on modes of operation after commissioning the Evaporative Cooling System Spray Tower.

6. If CEMEX fails to demonstrate compliance with the D/F standard it shall submit to the Agency a study within 45 days of receiving the failed D/F test results. The study shall describe the suspected cause of the failed test and propose a corrective action plan for Agency approval.

[Rule 62-213.440(2), F.A.C.; CEMEX Cement, Inc. submittal: North Brooksville Cement Plant Dioxin Furan Compliance Plan - Kiln #2 Mill Off Conditions, dated July 8, 2013]

B. Emission Unit ID No. 003 – SO_2 CEMS

In accordance with the requirements in Appendix D (Standard CEMS Requirements for SO_2 Monitoring) of Section 4, Permit No. 0530010-030-AC, Best Available Retrofit Technology (BART) project, this compliance plan is being included as a part of the Title V renewal permit for CEMEX Cement, Inc. to bring the facility into compliance and provide assurance of continual compliance with sulfur dioxide (SO_2) emission standards in accordance with Rules 62-296.340 and 62-4.070(3), F.A.C. The BART permit requires the installation and use of SO_2 CEMS to measure and record emissions of SO2 from Kiln No. 1. The facility is located at 16301 Ponce De Leon Blvd. in Brooksville, Hernando County. At the time of development of this compliance plan the Title V permit was being renewed when the facility was not in operation. The compliance plan will be implemented upon re-starting of the facility.

This compliance plan applies to Emission Unit ID No. 003 – Cement Kiln No. 1 (Baghouse E055) – Pyroprocessing/Raw Mill System to provide assurance of compliance with emission limits for SO_2 as per the compliance items referenced in Appendix D of Permit No 0530010-030-AC (BART) when the facility resumes operation.

1. SO_2 CEMS Operation Plan

   CEMEX will implement this SO_2 CEMS Operation Plan (Plan) for the proper installation, calibration/certification, maintenance and operation of the $S0_2$ CEMS required by permit. Installation, performance specifications and quality assurance requirements will be provided as per Section 4, Appendix D of the permit. CEMEX will submit this Plan to the Bureau of Air Monitoring and Mobile Sources for approval at least 60 days prior to the CEMS installation. The Plan shall become effective 60 days after submitted or upon its approval.

2. Timeline

   CEMEX will install the $S0_2$ CEMS required by this permit and conduct the appropriate performance specification for the CEMS no later than 60 calendar days after installation of the CEMS. The anticipated timeline is as follows:

   - Day 0 – 60: Purchase and acquisition (prior notice will be given to the FDEP for plant startup).
   - Day 60 – 120: Certification/Performance Specification 2 of 40 CFR part 60, Appendix B.
   - Day 120 – 180: Initial RATA will be used for compliance tests. On-going annual RATAs as per 40 CFR part 60, Appendix F will be used for annual compliance (stack testing). RATA and compliance reporting will be conducted as required by permit deadlines and F.A.C. rules.

[Rule 62-213.440(2), F.A.C.; CEMEX Cement, Inc. submittal: North Brooksville Cement Plant Dioxin Furan Compliance Plan - Kiln #1 SO2 CEMS, dated August 1, 2013]

The information required by this Compliance Plan shall be submitted to:

Kelley M. Boatwright
District Air Program Administrator – Southwest District
Florida Department of Environmental Protection
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926

Kiln No. 2 Evaporative Cooling System Spray Tower Project Schedule

Task Description	**Completion Date**
Solicit bids from Contractors for Evaporative Cooling System Spray Tower	90 day period upon start-up
Request Permit Expiration Date Extension for Construction Permit No. 0530010-038-AC (Construction of Kiln No. 2 Spray Tower)	Submitted July 8, 2013 *Note: Permit Amendment No. 0530010-046-AC (issued July 11, 2103) extended the expiration date of Construction Permit No. 0530010-038-AC to November 25, 2015*
Review bids and award contracts	30 days following 90 day period of soliciting bids
Perform Engineering and Equipment Delivery	8 months following contract awards *
Complete Construction/Installation of Equipment	18 months following contract award *
Start-up and Commissioning	30 days from completing equipment installation *
Submit diagnostic testing protocol for FDEP	30 days after commissioning *
Commence DF Diagnostic Testing (3 tests)	Within 14 days of receiving FDEP approval of the test protocol *
Submit Compliance Plan Test protocol, and submit test date notification in accordance with Rule 62-297.310(a)(9), F.A.C.	Within 14 days of receiving passing final Diagnostic Test result
Conduct DF Compliance Testing pursuant to Rule 62-297.310(7)(b), F.A.C.	Within 14 days of receiving FDEP approval of test protocol

* These completion times periods are targets to be met if achievable. Not meeting these time frames for valid reasons will not be considered a violation of this Compliance Plan. The monthly Compliance Plan Status Reports shall describe progress towards completion of the tasks, and identify and explain any anticipated difficulties in meeting these targets.