APPENDIX CP-1, Compliance Plan

CEMEX Construction Materials Florida, LLC…… **Permit No.:** 0530021-021-AV
Portland Cement Manufacturing Line 2 **Facility ID No.:** 0530021
10311 Cement Plant Road
Brooksville, FL 34601

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 Operation Permit Renewal for Cemex Construction Materials Florida, LLC located at 10311 Cement Plant Road, Brooksville, Hernando County, to bring the facility into compliance.

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."

Initial testing for particulate matter (PM) emissions, conducted on the Finish Mill and Air Heater (Emission Unit 052) on June 30, 2010 failed to demonstrate compliance. Testing was required with air heater on and off. With air heater off, PM emissions measured 0.0195 grains per dry standard cubic foot (gr/dscf); Specific Condition III.B.2. of permit 0530021-018-AC, limits the PM emissions to 0.01 gr/dscf. With air heater on, PM_{10} emissions measured 0.0085 gr/dscf, while with air heater off they were 0.0195 gr/dscf. PM_{10} emission limit, also established by Specific Condition III.B.2. of permit 0530021-018-AC, is 0.007 gr/dscf. Assuming all PM is PM_{10}, PM_{10} emission limit was exceeded as well.

The facility has completed additional EPA Method 5 compliance testing on October 8th 2010 and October 21st 2010; however, the official compliance test reports have not been submitted to verify compliance.

In order to demonstrate compliance regarding the Finish Mill and Air Heater (Emission Unit 052) the permittee shall submit to the Department the following two compliance test reports, with at least one of the reports indicating compliance with the PM emission limits:

1) The written compliance report for the tests conducted on October 8th, 2010 shall be submitted to the Department no later than November 22, 2010 and written compliance report for the compliance test conducted on October 21st shall be submitted to the Department no later than December 6, 2010.

If the written compliance report(s) do not indicate compliance with the PM emissions limit, Cemex shall perform corrective actions and submit a written report to the Department describing the actions taken within 7 days of performing such actions. In addition, Cemex shall submit a 15-day notification for re-testing in any of the failed modes of operation. These actions shall continue until compliance is demonstrated.