

KOOGLER & ASSOCIATES, INC.

ENVIRONMENTAL SERVICES

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KA 187-13-08
June 4, 2014

RECEIVED
JUN 03 2014
DIVISION OF AIR
RESOURCE MANAGEMENT

Jeff Koerner, Administrator
Air Permitting and Compliance Program
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399

**RE: Argos Newberry Cement Plant
Facility ID: 0010087
Signature Pages for Response to "Opening for Cause Letter" and Request for
Permit Revision and Correction**

Dear Jeff,

Enclosed are hardcopies of the signature pages for the air permit application submitted to you via email on June ,4 2014 for subject matter. In addition, the original hardcopy letter from Bill Voshell, Argos U.S. Environmental Director is enclosed.

Please feel free to contact me at (352) 377-5822 or mlee@kooglerassociates.com if you have any questions regarding this submittal. I sincerely appreciate your time for this project.

Regards,

Max Lee, PhD., P.E.
KOOGLER AND ASSOCIATES, INC.

Cc: via email only

Bill Voshell,, WVoshell@argos-us.com
Chris Horner, CHorner@argos-us.com
Henry Gotsch, OGotsch@argos-us.com
Angela Morrison, Esq., amorrison@amorrisonlaw.com



June 4, 2014

Via Email

Jeff Koerner, Administrator
Air Permitting and Compliance Program
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399
Jeff.koerner@dep.state.fl.us

RE: Argos Newberry Cement Plant
Facility ID No.: 0010087
Response to "Opening for Cause Letter" and Request for
Permit Revision and Correction

Dear Jeff:

As we have discussed, the Argos Newberry Cement Plant is subject to the emission guidelines under 40 CFR 60 Subpart DDDD, incorporated by under Rule 62-204.800, Florida Administrative Code, and this should be reflected in our air permit. In addition, and consistent with the Department's April 9th letter, the compliance date under 40 CFR 63 Subpart LLL is now September 7, 2015. While the new deadline is effective as a matter of law, the Title V permit should be revised to reflect the appropriate compliance date. As requested by the Department, we have carefully reviewed the facility's Title V permit to note where the corrections should be made. In our review, we have noted other corrections that should also be made. A marked-up version of the Title V permit is attached for your review and consideration.

Argos Cement LLC formally requests that the Department revise the Title V permit, and to the extent appropriate, to issue an air construction permit under parallel processing to accomplish the following:

- A. Reflect the applicability of the emission guidelines under 40 CFR 60 Subpart DDDD to Emission Units 003 and 010 (the in-line aw mill/kiln line systems for lines 1 and 2);
- B. Reflect the non-applicability of 40 CFR 63 Subpart LLL to these two Emission Units (003 and 010);
- C. Reflect the current requirements of 40 CFR 63 Subpart LLL applicable to Emission Units 2, 4, 5, 6, 8, 9, 11, 12, 13, and 14;
- D. Correct the name of the current owner and operator throughout the permit, consistent with Permit No. 0010087-048-AV; and,
- E. Correct provisions throughout the permit to ensure that they appropriately reflect the applicable requirements of prior air construction permits and the Department's current rules.

As noted in the Department's April 9th letter, Rule 62-213.430(4), Florida Administrative Code, provides that the Department will revise Title V permits when a source becomes subject to new regulatory requirements. Because of the regulatory applicability determination inherent in this request and because of the substantive nature of the corrections and changes, Argos Cement LLC respectfully requests that the Department's Division of Air Resource Management issue the construction permit and revised Title V air operation permit with involvement, as appropriate, by the Northeast District Office.

As the new owner of the Newberry Cement Plant, Argos Cement LLC sincerely appreciates the Department's cooperation and willingness to work with us to ensure that all applicable requirements are appropriately and correctly reflected in the facility's air permits. If you have any questions regarding the suggested revisions, if you need additional information to complete your review, or if you would like to schedule a meeting or a telephone conference for further discussions, please let me know so I can immediately respond. Thank you again for your time and efforts, and for your responsiveness to our requests.

Sincerely,

Argos Cement LLC



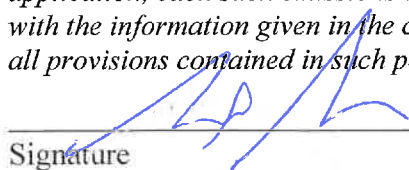
William Voshell

US Environmental Director

Attachment

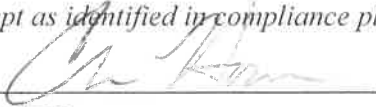

cc: Richard Rachal, DEP NE District, Richard.rachal@dep.state.fl.us
David Read, Florida DEP DARM, david.read@dep.state.fl.us
Hastings Read, Florida DEP DARM, hastings.read@dep.state.fl.us
Al Linero, Florida DEP DARM, Alvaro.linero@dep.state.fl.us
Max Lee, Koogler and Associates, mlee@kooglerassociates.com
Angela Morrison, Esq., angela@morrisonlaw.com

Professional Engineer Certification

1. Professional Engineer Name: Max Lee, Ph.D. P.E. Registration Number: 58091
2. Professional Engineer Mailing Address... Organization/Firm: Koogler and Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377-5822 ext.19 Fax: (352) 377-7158
4. Professional Engineer E-mail Address: mlee@kooglerassociates.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature  Date <u>6/3/14</u> (seal)

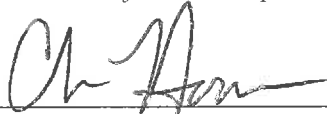

Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name: Chris Horner
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Argos Cement LLC Street Address: 4000 NW CR 235 City: Newberry State: Florida Zip Code: 32669
4. Application Responsible Official Telephone Numbers. Telephone: (352) 472 -4722 ext. 130 Fax: (352) 472 -2449
5. Application Responsible Official E-mail Address: CHorner@argos-us.com
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i>  Signature  Date

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Chris Horner
2. Owner/Authorized Representative Mailing Address. Argos Cement LLC Street Address: 4000 NW CR 235 City: Newberry State: Florida Zip Code: 32669
3. Owner/Authorized Representative Telephone Numbers... Telephone: (352) 472 -4722 ext. 130 Fax: (352) 472 -2449
4. Owner/Authorized Representative E-mail Address: CHorner@argos-us.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  _____ Signature  _____ Date