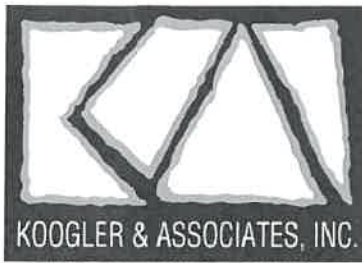


187-14-02
June 26, 2014



KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
www.kooglerassociates.com
352/377-5822 ■ FAX/377-5822

via email only

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
Air Construction Permit Application
Facility ID: 0010087

*Jeff, -per my email
please see signature
page attached ✓
Max*

RECEIVED
JUN 30 2014
DIVISION OF AIR
RESOURCE MANAGEMENT

Dear Jeff,

On behalf of Argos Cement LLC, I am submitting to you an application to request a permit for the use of alternative fuel materials (AFM) for kilns 1 and 2 at the subject facility. As you are aware, every other operating cement plant in Florida has been issued a similar permit. I have attached the AC permit application with appendices in adobe pdf for your review. In follow up to this email, I will make sure that you receive the hardcopy seal and signature pages for the Department files.

Regarding the very recent U.S. Supreme court ruling on the Tailoring Rule, the application shows that no PSD pollutant will trigger PSD thresholds. Therefore, for the purposes of this application, the court ruling and how FDEP handles incorporation of that ruling should have no bearing on this application.

Please contact me if you have any questions on the application. Thank you for your time and I look forward to working with you and your staff on this application.

Sincerely,



Max Lee, Ph.D., P.E.
President, Koogler and Associates, Inc.
mlee@kooglerassociates.com

ec: William Voshell Jr., Argos Cement LLC, WVoshell@argos-us.com
Chris Horner, Argos Cement LLC, CHorner@argos-us.com
Henry Gotsch, Argos Cement LLC, OGotsch@argos-us.com
David Read, Florida DEP DARM, david.read@dep.state.fl.us
John Phillips, Florida DEP NE District, John.D.Phillips@dep.state.fl.us
Hastings Read, Florida DEP DARM, hastings.read@dep.state.fl.us
Angela Morrison, Morrison Environmental Law, amorrison@amorrisonlaw.com
Steve Kohl, SKohl@wnj.com

FACILITY INFORMATION

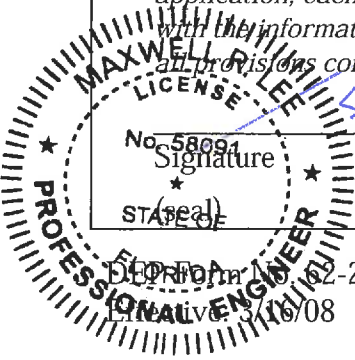
Owner/Authorized Representative Statement

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

1. Owner/Authorized Representative Name : Chris Horner, Plant Manager
2. Owner/Authorized Representative Mailing Address... Organization/Firm: 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

FACILITY INFORMATION

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: <u>mlee@kooglerassociates.com</u>
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 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>6/26/14</u>