From: Dr. Max Lee
To: McWade, Tammy
Cc: William Voshell Jr. (WVoshell@argos-us.com); Otar Gotsch
Subject: 187-14-10 FW: 0010087-052-AC-PSD-FL 228E and PSD-FL-350C, Argos Cement, LLC., Argos Cement, Draft Permit
Date: Thursday, September 25, 2014 10:26:59 AM
Attachments: image001.png
image002.png
0010087-052-AC - Written Notice_signed.pdf
0010087-052-AC - Public Notice.docx

Hi Tammy,

Overall the permit looks great - thank you very much. I did want to point out a minor, but important, issue in the TEPD regarding the general concept of PSD on GHGs.

The TEPD table is stating SER is 0 tpy for GHG. Based on my understanding from Jeff and Paula, the SER should be 75,000 tpy, not 0. The reference should be to the EPA guidance that came out after the supreme court decision, which DEP is following. Footnote C needs to reference EPA's guidance indicating that the SER is effectively 75,000 since the supreme court kicked out the definition of "subject to regulation."

Thanks,

Max

Although a facility may be "major" (i.e. emits or has the potential to emit 100 or 250 TPY as applicable) for only one PSD pollutant, a project must include Best Available Control Technology (BACT) controls for any PSD pollutant that exceeds the corresponding SER given in **Table 1** below.

TABLE 1 – LIST OF SER BY PSD-POLLUTANT. [a, c]

Pollutant	SER (TPY)	Pollutant	SER (TPY)
CO	100	NO_X	40
$PM/PM_{10}/PM_{2.5}$	25/15/10	Ozone (VOC) [2]	40
$PM_{2.5}$ (NO_X)	40	$PM_{2.5}$ (SO_2)	40
Ozone (NO_X) [2]	40	SAM	7
SO_2	40	Pb	0.6
Hg	0.1	GHGs	0 [c]

a. Excluding fluoride and pollutants specific to the Pulp and Paper industry, MWCs, MSW landfills.
b. Ozone (O_3) is regulated by its precursors (VOC and NO_X). PSD for $PM_{2.5}$ can be triggered by its precursors (NO_X and SO_2).
c. Pursuant to 40 CFR 52.21(b)(23)(ii), pollutants with no SER listed at 40 CFR 52.21(b)(23)(i) have a SER of zero tons/year.

From: Scearce, Lynn [mailto:Lynn.Scearce@dep.state.fl.us]
Sent: Tuesday, September 23, 2014 3:45 PM
To: chorner@argos-us.com
Cc: ogotsch@argos-us.com; Dr. Max Lee; Rachal, Richard; Ceron, Heather; 'lusky.kathleen@epa.gov'; McWade, Tammy; Read, David; Scearce, Lynn
Subject: 0010087-052-AC-PSD-FL 228E and PSD-FL-350C, Argos Cement, LLC., Argos Cement, Draft Permit

Dear Mr. Horner:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and reply back verifying receipt of the documents provided in the links.

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify

Owner/Company Name: ARGOS CEMENT, LLC
Facility Name: ARGOS NEWBERRY CEMENT PLANT
Project Number: 0010087-052-AC-PSD-FL 228E and PSD-FL-350C
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: ALACHUA

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0010087.052.AC.D_pdf.zip.

If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Sincerely,

Lynn Scearce

Office **o**f **P**ermitting **a**nd **C**ompliance **(OPC)**
Division **o**f **A**ir **R**esource **M**anagement – **DEP**

2600 **B**lair **S**tone **R**oad, **M**ail **S**top **5505**
Phone: **8**50-717-**9**025