

From: [Dr. Max Lee](#)
To: [Koerner, Jeff](#)
Subject: 187-14-09 RE: Request for Cement MACT Compliance Date Extension
Date: Wednesday, January 14, 2015 11:42:10 AM

Jeff,

In follow up to our call this morning, I am requesting that the NESHAP compliance extension authorization dates (3/31/16 and 9/9/16 as noted below) be written not specific to either coolers 1 and 2. As noted on the detailed schedule we submitted for the time frames for the two cooler projects, both coolers are allotted the same time sequence to come into compliance but the difference of timing is the starting date of planning/construction. This flexibility will allow Argos and its contractors to complete both cooler conversions on time.

We appreciate your consideration of this request.

Thank you,
Max

Max Lee, Ph.D., P.E.



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From: Koerner, Jeff [<mailto:Jeff.Koerner@dep.state.fl.us>]
Sent: Monday, January 12, 2015 4:15 PM
To: William Voshell (WVoshell@argos-us.com)
Cc: Dr. Max Lee; Read, David; McWade, Tammy
Subject: Request for Cement MACT Compliance Date Extension

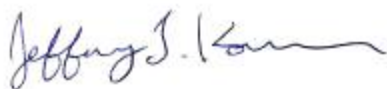
William Voshell, Environmental Director
Argos USA
3015 Windward Plaza, Suite 300
Alpharetta, GA 30005
Office: 678.392.2147
Cell: 770.843.3456
wvoshell@argos-us.com

Re: Argos Newberry Cement Plant, ARMS ID No. 0010087
Clinker Cooler Nos. 1 and 2 (Emissions Unit Nos. 004 and 011)
Request for Cement MACT Compliance Date Extension, Sufficiency

Dear Mr. Voshell:

On December 12, 2014, we received your full request^[1] for an extension of the compliance date for Clinker Cooler Nos. 1 and 2, which are subject to the Cement MACT Rule.^[2] For this rule, the compliance date for the clinker coolers is September 9, 2015. Specifically, your request is for an extension of the compliance date to March 31, 2016 for Clinker Cooler No. 1 and to September 9, 2016 for Clinker Cooler No. 2. The Department believes your request contains sufficient information for making a determination regarding the extension.^[3] The Department expects to make a determination within 30 days of this letter along with the pending Title V permit revision (Project No. 0010087-050-AV). If you have any questions, please contact David Read at 850-717-9075 or me at 850-717-9083.

Sincerely,



Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management
Office: 850-717-9083

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- ¹ The [initial](#) Argos extension request was received on 11/26/14 with additional [follow up information](#) (dated 12/09/14) received on 12/12/14.
 - ² The Maximum Achievable Control Technology (MACT) standards are specified in the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry. See Title 40, Part 63, [Subpart LLL](#) of the Code of Federal Regulations.
 - ³ See Section [63.6\(i\)\(12\)\(i\)](#) in Title 40, of the Code of Federal Regulations.

