

263-14-18
May 4, 2015



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

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: **CEMEX Construction Materials Florida, LLC -- Request for Extension of Compliance Date under Portland Cement NESHAP, 40 CFR Part 63, Subpart LLL Miami Cement Plant, Facility ID: 0250014 Kiln, Emission Unit EU018**

Dear Mr. Koerner:

Pursuant to the requirements of 40 CFR 63.6(i)(4) as adopted by reference at 62-204.800(b)(48) F.A.C. and under the authority of 42 USC 7412(i)(3)(B), CEMEX Construction Materials Florida, LLC (CEMEX) submits this request for an extension of the date for compliance with certain requirements of the Portland Cement NESHAP, 40 CFR Part 63, Subpart LLL (“PCMACT”) for its Miami, Florida cement facility. CEMEX is requesting an extension to demonstrate compliance to the PCMACT for the kiln emissions unit (EU018).

Construction projects involving the new NESHAP regulations are currently awaiting Miami-Dade county permitting. These projects directly relate to ability to continuously monitor PM, THC, HCl, and Hg, and operate a sorbent injection system for the requirements in Subpart LLL. A new ultra-low-sulfur diesel (ULSD) tank is also waiting on Miami-Dade county permitting to be installed. The proposed extension would be for the previously listed pollutants and for the diesel fuel requirement during startup and shutdown periods. The length of the proposed extension is to be between 3 and 12 months after September 9, 2015. This extension date would be based on the date of county permitting approval as described in detail below.

Background

In order to comply with the new requirements per NESHAP Subpart LLL, CEMEX Miami has designed, procured and initiated construction of a new building to house their continuous monitoring systems equipment including monitors for PM (parametric monitor), THC, SO₂ (surrogate for HCl) and Hg. This involves construction of a new CEMS building, a new platform on the stack, installation of corresponding electrical and communication lines. Cemex also plans to ensure HCl compliance using a new sorbent injection system. A new ULSD tank will be also installed. South Florida has a high occurrence of storms and hurricanes, and these play a major role in permitting. Due to these storm impacts, building permits often require an extended amount of time for approval.

The tank, housing, platform, and all of the required monitors are on site and are just awaiting building permit approval. Miami-Dade County is not able to determine when the permits will be approved. The county heavily scrutinizes all county building permit applications given the impact of hurricanes in the Miami area. The county permitting department will not provide any guidance or timeline as to an expected date of approval. This is the primary concern in regards to the upcoming NESHAP deadline. The construction will take time to complete after the building permits are approved. After construction and modification, the instruments, tanks and sorbent injection system will need to be calibrated and adjusted before compliance can be achieved.

Satisfaction of 40 C.F.R. 63.6(i)

The provisions of 40 C.F.R. 63.6(i)(6)(i) require that a request for an extension of the compliance date include the following information.

The request for a compliance extension under paragraph (i)(4) of this section shall include the following information:

(A) A description of the controls to be installed to comply with the standard;
(B) A compliance schedule, including the date by which each step toward compliance will be reached. At a minimum, the list of dates shall include:

- (1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated; and*
- (2) The date by which final compliance is to be achieved.*
- (3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and*
- (4) The date by which final compliance is to be achieved.*

Control Measures

Particulate Matter, PM compliance: New high efficiency membrane bags have already been installed in the baghouse. The PM CPMS cannot be installed until the CEMS monitoring shelter receives county permits and construction is completed.

Total Hydrocarbons, THC compliance: A new THC monitor will be installed in the new CEMS room after county permits are obtained. Even though the cement plant construction date was prior to the first NESHAP monitoring requirement for THC, CEMEX has operated a reasonable assurance THC monitor as a reasonable assurance indicator of compliance. That monitor has not been maintained at the same level of a NESHAP compliance monitor (e.g., not included in compliance CEMS NESHAP O&M procedures). CEMEX purchased the new THC monitor specifically to replace

this older THC monitor to ensure that the NESHAP THC emissions monitoring requirements can be fully met.

Hydrochloric acid, HCl compliance: HCl will be monitored by SO₂ surrogate as allowed by Subpart LLL, but it must also have a sorbent injection system installed and operational. CEMEX Miami currently has an AC permit (0250014-052-AC) to install the injection system, but is awaiting approval of county building permits to install. Note that HCl compliance is contingent on both, county permits for the CEMs room and the sorbent injection system. Thus, for HCl compliance, the final compliance date will be the later date that both permits are obtained.

Mercury, Hg compliance: Sorbent traps will be installed in the new CEMS room. CEMEX will continue to comply by material analysis and balance throughout the extension period until compliance is demonstrated by Hg CEMS.

NOTE: for all new instrumental installations, CEMEX will also need to properly secure communications channels between the existing DAS and the new instrument.

The following pollutants are currently able to provide compliance and require no extension: **D/F**.

Use of Ultra Low Sulfur Diesel, ULSD: In order to comply with NESHAP in regards to startup and shutdown fuels, CEMEX will be installing a new 12,000 gallon ultra-low-sulfur diesel (ULSD) tank for use during startup and shutdown periods. This tank installation requires county permitting that will be issued at an unknown date. CEMEX requests that the required use of special fuels during startup and shutdown be included in this extension request.

Compliance Schedule

Since the date of permit approval from the county is unknown, CEMEX requests that the extension length be based upon when Miami-Dade County approves the construction permits. The extension dates apply to the previously listed pollutants (PM, THC, HCl, Hg) as well as the startup and shutdown fuel requirement. See Table 1 for the time frames requested.

Table 1: NESHAP Subpart LLL Extension Dates

If the required permits are obtained:	The length of extension requested is:	The proposed final compliance date will be:
Before June 1, 2015	Three (3) months	December 9, 2015
Before October 1, 2015	Six (6) months	March 9, 2016
On or after October 1, 2015	Twelve (12) months	September 9, 2016

63.6(i)(6)(i)(b)

(1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated;

On-site construction is expected to be initiated within 30 days of receiving county permit approval. Installation of emission control equipment is expected to be initiated within 60 days of county permit approval.

(3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and

Construction and installation of new equipment is expected to be completed at least one month before the final compliance date shown in Table 1.

(4) The date by which final compliance is to be achieved.

The date by which final compliance is to be achieved is variable. See Table 1 for specific dates.

Conclusion

CEMEX has all of the equipment required to comply with the new NESHAP Subpart LLL regulations on hand and has every intention to be in compliance with these new regulations. The primary obstacle is the approval of building permits from Miami-Dade County. Since the date of this approval is unknown, it is unlikely that CEMEX Miami will be ready for compliance by September 9, 2015. CEMEX requests an extension for the new fuel requirements during startup and shutdown. CEMEX also requests that the NESHAP compliance date for the following pollutants (PM, THC, HCl, Hg) be extended. The proposed date for final NESHAP compliance will be (Dec. 9, 2015 or Mar. 9, 2016 or Sep. 9, 2016) based on permit approval dates. See Table 1 for how this date will be determined.

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

I (Max Lee, President of Koogler and Associates, Inc.) am submitting this request on behalf of CEMEX Construction Materials Florida, LLC.

Sincerely,



Max Lee
President, Koogler and Associates, Inc.

cc: Luis Lopez, CEMEX Miami Plant Manager, luisguillermo.lopez@cemex.com
Charlie Walz, CEMEX Miami Environmental Manager, charles.walz@cemex.com
Lillian DePrimo, CEMEX Environmental Director, lillianf.deprimo@cemex.com
David Read, Florida DEP DARM, david.read@dep.state.fl.us
Mallika Muthiah, RER, MuthiM@miamidade.gov
Max Lee, Koogler and Associates, Inc., mlee@kooglerassociates.com
Reece Spencer, Koogler and Associates, Inc., rspencer@kooglerassociates.com