



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

January 10, 2006

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Michael A. Gonzales
Plant Manager
CEMEX Cement, Inc.
Post Office Box 6
Brooksville, Florida 34605-0006

Re: DEP File 0530010-022-AC

Trial Period for Petroleum Coke and WTDF Firing at CEMEX Brooksville Plant

The Department originally received an air construction permit application on October 14th for various projects at the CEMEX Brooksville Plant (Project No. 0530010-018-AC, PSD-FL-362). Included in this application was the request for use of up to 100% petroleum coke as a fuel in Kilns 1 and 2, and the use of tire-derived fuel (TDF) in Kiln No. 2. On November 15 the Department sent a Request for Additional Information addressing the completeness of this application.

On December 12, 2005, the Department received an application for an air construction permit to allow the firing of petroleum coke in Kilns No. 1 and No. 2, and waste tire derived fuel (WTDF) in Kiln No. 2 during a trial period to assess the affect of these fuels on emissions.

The Department has determined that the application is incomplete. The Department requests submittal of additional information in order to continue processing your application pursuant to Rules 62-4.055, and 62-4.070 F.A.C., Permit Processing. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

The following information is required to complete the application:

1. CEMEX is proposing a six month trial period. Please explain why such an extended period may be necessary to conduct the proposed testing.
2. CEMEX is also requesting that the current emission limits be temporarily lifted for both kilns (Kilns No. 1 and No. 2) during the trial period. Although the Department may require compliance with all existing emissions limits during the trial period, please provide more precise details as to which pollutant limitations should be lifted, and to what extent CEMEX feels the limits should be lifted.

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3. Please provide a more detailed description of the testing protocol to be followed. At a minimum, please describe the procedure for establishing baseline emissions from each kiln, describe in more detail the various feed amounts of petroleum coke and tires that are expected to be fired in each kiln, and state which pollutant tests will be carried out for each testing scenario. This is not a request for the exact test protocol to be followed during the trial period, but rather a request for a more detailed description of the procedures and objectives of the project.
4. CEMEX proposes to certify the recently installed NO_x and CO CEMS during the trial period. The Department will require certification of these instruments prior to the trial period in the requested permit. Please comment and/or provide the certification documentation for the CO and NO_x CEMS.
5. According to the application, "CEMEX may modify the firing system to an indirect-firing system". Please describe any work conducted or that will be conducted with respect to this change. Is this change planned for both kilns, and is it scheduled to take place during the trial period or prior to the beginning of the trial period?
6. CEMEX has requested the ability to burn 100% petroleum coke during the trial period. In the application it is stated that there may be a limitation to this ability "based on the sulfur/alkali ratio and/or other factors". What is the maximum amount of petroleum coke expected to be achieved? What are the "other factors" that may limit the use of petroleum coke?
7. Has CEMEX or its affiliates had any violations (or warning letters) related to any Department or EPA regulations at any of their facilities in Florida and the United States? Have officers of CEMEX also been officers of other companies that have had violations (or warning letters) of Department regulations at any facilities? Please provide all documentation in relation to any such violations.

The following questions were included in the Department's November 15 Request for Additional Information regarding the previous permit application (Project No. 0530010-018-AC, PSD-FL-362) to which the Department has not yet received a response. However, because of the relevance of the information to the current project, the Department is requesting that the following information be submitted for the completion of this project:

8. With the low alkali levels in the native limestone, how will CEMEX compensate with the greater alkali requirements inherent in burning petroleum coke? Will it be necessary for CEMEX to use even more of the 16% LOI fly ash and less bauxite or sand or clay?
9. Provide the procedures for receiving and storing petroleum coke as well as controlling dust from handling. Provide procedures related to groundwater protection.
10. Are the coal mills capable of grinding petroleum coke to the specifications needed and to supply a 100% petroleum coke fuel stream for the two kilns? If not, what amount of petroleum coke are the mills capable of supplying to the two kilns?
11. Please provide information on the effects of additional vanadium and nickel found in petroleum coke upon the formation of sulfuric acid mist.

12. Please describe any work conducted or that will be conducted with respect to burning TDF. This should include any modifications made or to be made to the existing tire burning system on Kiln 1 and the proposed system on Kiln 2. Describe the handling and feeding system.
13. Given the lack of a tertiary air duct, how will CEMEX insure that sufficient air will be available in the area of the kiln riser to insure proper combustion of TDF and burn out of CO?
14. Describe the combustion zone within the riser and lower preheater including the residence time to insure maximum burnout of CO.
15. How will burning TDF and petroleum coke affect the heat balance as well as conditions related to dioxin formation and control?
16. Provide information from other CEMEX projects where petroleum coke or TDF have been used and summarize the resulting emissions changes. Provide any test reports related to past petroleum coke or TDF test burns.
17. Please provide a summary for the past two years of the required daily sampling and recording of baghouse dust thallium concentration described in Condition B.20 of the facility Title V Operation Permit.
18. Does CEMEX waste baghouse dust in general or in order to meet the mentioned thallium requirements in particular?
19. Where is the dust stored or where is it disposed or sold?

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature.

Permit applicants are advised that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days. Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application.

If you have any questions regarding this matter, please call me at 850/921-9523 or Cindy Mulkey at 850/921-8968.

Sincerely,



A. A. Linero, P.E.
Program Administrator
South Permitting Section

Cc: Fawn Bergen, P.E.
Mara Nasca, DEP SWD
Charles Walz, CEMEX

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee <i>x Darlene G. Peterson</i></p> <p>B. Received by (Printed Name) C. Date of Delivery <i>Darlene A Peterson</i></p>
<p>1. Article Addressed to:</p> <p>Mr. Michael A. Gonzales Plant Manager CEMEX Cement, Inc. Post Office Box 6 Brooksville, Florida 34605-0006</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> <p><i>7000 1670 0013 3110 0161</i></p>

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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7000 1670 0013 3110 0161	<table border="1"> <tr> <td data-bbox="560 1330 755 1372">Postage</td> <td data-bbox="755 1330 950 1372">\$</td> <td data-bbox="950 1330 1209 1372" rowspan="4">Postmark Here</td> </tr> <tr> <td data-bbox="560 1372 755 1415">Certified Fee</td> <td data-bbox="755 1372 950 1415"></td> </tr> <tr> <td data-bbox="560 1415 755 1478">Return Receipt Fee (Endorsement Required)</td> <td data-bbox="755 1415 950 1478"></td> </tr> <tr> <td data-bbox="560 1478 755 1542">Restricted Delivery Fee (Endorsement Required)</td> <td data-bbox="755 1478 950 1542"></td> </tr> <tr> <td colspan="2" data-bbox="560 1542 1079 1713"> Mr. Michael A. Gonzales Plant Manager CEMEX Cement, Inc. Post Office Box 6 Brooksville, Florida 34605-0006 </td> <td data-bbox="1079 1542 1209 1713"></td> </tr> <tr> <td colspan="2" data-bbox="560 1713 990 1755"> PS Form 3800, May 2000 </td> <td data-bbox="990 1713 1209 1755"> See Reverse for Instructions </td> </tr> </table>	Postage	\$	Postmark Here	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		Mr. Michael A. Gonzales Plant Manager CEMEX Cement, Inc. Post Office Box 6 Brooksville, Florida 34605-0006			PS Form 3800, May 2000		See Reverse for Instructions
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