



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 12, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Charles E. Walz
Plant Environmental Manager
CEMEX Cement, Inc.
Post Office Box 6
Brooksville, FL 34605-0006

Re: Application for Air Permit to Construct or Modify One or More Emission Units
CEMEX Cement, Inc., Brooksville, Hernando County
Permit No. 0530010-011-AC

Dear Mr. Walz:

On November 21, 2002, the Florida Department of Environmental Protection (Department) received your application (dated November 20, 2002) to modify Kilns Nos. 1 and 2 at the CEMEX Cement, Inc., facility in Brooksville, Hernando County. This facility is a Portland cement plant with emissions of multiple regulated pollutants greater than 100 tons per year and is therefore a major facility with respect to the Prevention of Significant Deterioration (PSD) program. Your permit application for this facility addressed three modifications:

- Adding waste tires as a supplemental fuel for Kiln No. 2,
- Substituting an annual preheater feed limit in place of the existing 30-day rolling average hourly preheater feed rate limit on both kilns, and
- Approving the use of petroleum coke (petcoke) as an alternative fuel in both kilns.

Current PSD guidance from the U.S. Environmental Protection Agency (EPA) indicates that actual emissions should be compared with the future potential emissions following the proposed changes. Accordingly, each of the changes discussed in your application could individually result in a significant net emissions increase in one or more regulated air pollutants – thereby resulting in a modification to a major facility subject to preconstruction review pursuant to Rule 62-212.400(2)(d)4., Florida Administrative Code (F.A.C.). The application is therefore incomplete, as it contains none of the information needed by the Department to make a determination of Best Available Control Technology (BACT) as required by Rule 62-212.400(6), F.A.C.

Pursuant to Rule 62-4.055, F.A.C., Permit Processing, the Department requests that you submit revised application forms, as necessary, and supplemental information consistent with the requirements of Rule 62-212.400(5), F.A.C. This includes, but is not limited to, the following:

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- Technology review,
- Top-down BACT analysis,
- Ambient impact analysis,
- Additional impact analysis,
- Preconstruction air quality monitoring and analysis, and
- PSD permit application information, including:
 - A description of the nature, location, design capacity and typical operating schedule of the facility or modification, including specifications and drawings showing its design and plant layout;
 - A detailed schedule for construction of the facility or modification;
 - A detailed description of the system of continuous emissions reduction proposed by the facility or modification as BACT, emissions estimates and any other information as necessary to determine that BACT would be applied to the facility or modification;
 - Information relating to the air quality impact of the facility or modification, including meteorological and topographical data necessary to estimate such impact;
 - Information relating to the air quality impacts of, and the nature and extent of, all general commercial, residential, industrial and other growth which has occurred since August 7, 1977, in the area the facility or modification would affect; and
 - A good-engineering-practice stack height, or other dispersion techniques, analysis to demonstrate compliance with Rule 62-210.550, F.A.C.

As an alternative, you could submit a revised application proposing allowable emissions less than the current actual emissions plus the significant emission rate for each pollutant. Through limiting hours of operation, the amount of petcoke burned, or some other mechanism, the facility could thereby avoid triggering a PSD review.

In either case, please provide specific responses to the following, as requested by the Department pursuant to Rule 62-4.070, F.A.C., Standards for Issuing or Denying Permits.

1. Assess the impact of firing waste tires as supplemental fuels on plant operation and emissions. Identify the mechanism that will be used to introduce the whole tires; provide in detail all design features of the waste tire handling and feeding operations. Include drawings and layouts of the waste tire operation showing the point of waste tire introduction. Provide typical oxygen and carbon monoxide levels at all points in the kiln and preheater tower along with documentation and an estimate of the impact of waste tire introduction.
2. Provide the operating hours per year and total annual preheater feed (tons) for each kiln for the past five calendar years. Identify on process flow sheets the fate of collected and recycled cement kiln dust, the point(s) of reintroduction of cement kiln dust to preheater feed, and the relative location of the preheater feed weigh scales. Please comment on the fate of the steel in the waste tires and the ash content of the dry solid fuels with respect to existing and proposed preheater feed limits.
3. Petcoke has a lower volatility and a higher nitrogen content relative to coal, both of which could contribute to higher nitrogen oxides (NO_x) emissions. Sulfur and carbon contents are also higher in petcoke, which could result in elevated sulfur dioxide (SO₂) and carbon monoxide emissions. In addition, switching to petcoke can cause not only blockages and plugging in the preheater cyclones

and riser ducts, but also an increase in fugitive particulate matter at the facility ("dusty kiln"). Estimate the increase in potential emissions from firing petcoke. Please comment on how CEMEX will meet the special challenges that must be addressed to convert the kilns to burning petcoke as a primary fuel source.


4. Specifically quantify the impacts of the waste tire and petcoke modifications on the potential emissions of mercury and vanadium.

Because your application contained no information regarding a preconstruction review, the Department was not able to conduct a review. The Department therefore explicitly reserves the right to review and request additional information regarding any submitted BACT, ambient impact, and other analyses.

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. Please note that per Rule 62-4.055(1): *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department.... 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 Greg DeAngelo at (850)921-9506.

Sincerely,


for A. A. Linero, P.E. Administrator
New Source Review Section

AAL/gpd

cc: Stephen Walser, CEMEX
Steve Cullen, P.E., Koogler & Associates

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. Received by (Please Print Clearly) BETH A. FLANDERS</p> <p>B. Date of Delivery</p>
<p>1. Article Addressed to:</p> <p>Mr. Charles E. Walz Plant Environmental Manager CEMEX Cement, Inc. P. O. Box 6 Brooksville, FL 34605-0006</p>	<p>C. Signature X Beth A. Flanders <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</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>2. <u>7001 0320 0001 3692 7379</u></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>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>

PS Form 3811, July 1999

Domestic Return Receipt

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U.S. Postal Service
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Sent To **Charles E. Walz**

Street, Apt. No.,
or PO Box No. **PO Box 6**

City, State, ZIP+4
Brooksville, FL 34605-0006

PS Form 3860, January 2001 See Reverse for Instructions