



4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 • FAX/377-7158

KA 521-06-20
June 26, 2007

RECEIVED

JUN 27 2007

BUREAU OF AIR REGULATION

Ms. Trina Vielhauer
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

**RE: CEMEX Cement, Inc.; Brooksville Cement Plant
AC Permit Application to Extend Permit No. 0530010-026-AC and Revise NO_x Limit;
Indirect Firing System**

Dear Trina:

CEMEX Cement, Inc. (CEMEX) is submitting the enclosed Air Construction Permit Application to revise the NO_x emissions limit and to request a 2-year extension of Air Construction Permit No. 0530010-026-AC (Installation of Indirect Firing System and SNCR). CEMEX is still moving forward with this project and have been able to achieve reduced NO_x emissions. However, additional time is needed to complete the installation of the Indirect Firing System to achieve reduced NO_x emissions on a continuous basis.

In addition, CEMEX is requesting a revision to the NO_x limit contained in the referenced construction permit to remove the pounds per ton (lb/ton) limit. Since the NO_x emission limits for both Kiln No. 1 and Kiln No. 2 were established to avoid PSD, and not as BACT, CEMEX is requesting NO_x emission limits stated in terms of pounds per hour (lb/hr) and tons per year (TPY) only. The NO_x limit of 1.21 lb/ton preheater feed can be included as an equivalent emission limit but not as an enforceable limit.

The rationale for this request is that the annual NO_x emission limit from each kiln was established at 786.5 TPY to avoid a PSD review; including the avoidance of a BACT determination. This being the case, the only assurance the Department needs is that the annual NO_x emissions from each kiln will not exceed 786.5 TPY.

To achieve this assurance, it is suggested that the permit contain an hourly NO_x emissions limit of 179.6 lb/hr (786.5 TPY divided by 8,760 hours per year) and annual emission limit of 786.5 TPY, both 12-month rolling averages. These limits can be verified with the certified NO_x CEMS.

Please feel free to contact me at (352) 377-5822 or FBergen@kooglerassociates.com, or Mr. Charles Walz, CEMEX, at (352) 799-2011, if you have any questions regarding this submittal.

Very truly yours,

KOOGLER & ASSOCIATES, INC.



Fawn W. Bergen, P.E.
Project Engineer

FB

cc: J. Gill, CEMEX
A. Linero, FDEP
C. Walz, CEMEX



Department of Environmental Protection

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JUN 27 2007

Division of Air Resource Management

BUREAU OF AIR REGULATION

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for any air construction permit at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air permit. Also use this form to apply for an air construction permit:

- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment area (NAA) new source review, or maximum achievable control technology (MACT) review; or
- Where the applicant proposes to assume a restriction on the potential emissions of one or more pollutants to escape a federal program requirement such as PSD review, NAA new source review, Title V, or MACT; or
- Where the applicant proposes to establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial/revise/renewal Title V air operation permit.

Air Construction Permit & Title V Air Operation Permit (Concurrent Processing Option) – Use this form to apply for both an air construction permit and a revised or renewal Title V air operation permit incorporating the proposed project.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: CEMEX Cement, Inc.	
2. Site Name: Brooksville Cement Plant	
3. Facility Identification Number: 0530010	
4. Facility Location... Street Address or Other Locator: 1630 Ponce de Leon Blvd. City: Brooksville County: Hernando Zip Code: 34601	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Fawn W. Bergen, PE	
2. Application Contact Mailing Address... Organization/Firm: Koogler & Associates, Inc. (Cert. Of Authorization No. 6570) Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609	
3. Application Contact Telephone Numbers... Telephone: (352) 377-5822 ext.29 Fax: (352) 377-7158	
4. Application Contact Email Address:	

Application Processing Information (DEP Use)

1. Date of Receipt of Application: 6-27-07	3. PSD Number (if applicable):
2. Project Number(s): 0530010-034-AC	4. Siting Number (if applicable):

APPLICATION INFORMATION

Purpose of Application

This application for air permit is submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Application is for a request to extend the expiration date of Permit No. 0530010-026-AC (Indirect Firing installation permit) and to revise the NO_x emissions limit contained in the permit.

APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
003	No. 1 Cement Kiln	AC1B	003
014	No. 2 Cement Kiln	AC1B	014

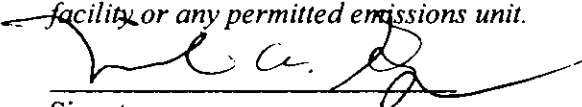
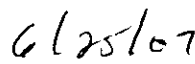
Application Processing Fee

Check one: Attached - Amount: \$ _____ Not Applicable

APPLICATION INFORMATION

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name: Michael A. Gonzales, Plant Manager
2. Owner/Authorized Representative Mailing Address... Organization/Firm: CEMEX Cement, Inc. Street Address: Post Office Box 6 City: Brooksville State: Florida Zip Code: 34605-0006
3. Owner/Authorized Representative Telephone Numbers... Telephone: (352) 799-2057 ext. Fax: (352) 754-9836
4. Owner/Authorized Representative Email Address: Michaelanthony.gonzales@cemexusa.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the facility addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other requirements identified in this application to which the facility is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit.</i>  Signature  Date

APPLICATION INFORMATION


Application Responsible Official Certification N/A

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name:			
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable):			
<input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C.			
<input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively.			
<input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official.			
<input type="checkbox"/> The designated representative at an Acid Rain source.			
3. Application Responsible Official Mailing Address...			
Organization/Firm:			
Street Address:			
City:		State:	Zip Code:
4. Application Responsible Official Telephone Numbers...			
Telephone: () -		ext.	Fax: () -
5. Application Responsible Official Email Address:			
6. Application Responsible Official Certification:			
<p><i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i></p>			
_____ Signature		_____ Date	

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Fawn W. Bergen Registration Number: 61614
2. Professional Engineer Mailing Address... Organization/Firm: Koogler & Associates, Inc. (Cert. Of Authorization No. 6570) Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377-5822 ext. 29 Fax: (352) 377-7158
4. Professional Engineer Email Address: FBergen@kooglerassociates.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input checked="" type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i>  Signature _____ Date <u>6/26/07</u> (seal)

* Attach any exception to certification statement.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 East (km) 356.9 North (km) 3169.0		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 28/38/34 Longitude (DD/MM/SS) 82/28/25	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 32	6. Facility SIC(s): 3241
7. Facility Comment :			

Facility Contact

1. Facility Contact Name: Charles E. Walz, Environmental Manager
2. Facility Contact Mailing Address... Organization/Firm: CEMEX Cement, Inc. Street Address: Post Office Box 6 <div style="display: flex; justify-content: space-between; margin-top: 5px;"> City: Brooksville State: Florida Zip Code: 34605-0006 </div>
3. Facility Contact Telephone Numbers: Telephone: (352) 796-7241 ext. Fax: (352) 754-9836
4. Facility Contact Email Address: cwalz@cemexusa.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I. that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: <div style="display: flex; justify-content: space-between; margin-top: 5px;"> City: State: Zip Code: </div>
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official Email Address:

FACILITY INFORMATION

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

FACILITY INFORMATION

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM	A	N
PM ₁₀	A	N
NO _x	A	N
SO ₂	A	N
CO	A	N
VOC	A	N
HCl	A	N
HAPs - Total	A	N

FACILITY INFORMATION

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility Wide Cap [Y or N]? (all units)	3. Emissions Unit ID No.s Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

FACILITY INFORMATION

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>10/05</u>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>10/05</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>10/05</u>

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: <u>A</u>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <u>A</u>
4. List of Exempt Emissions Units (Rule 62-210.300(3), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

FACILITY INFORMATION

Additional Requirements for FESOP Applications

<p>1. List of Exempt Emissions Units (Rule 62-210.300(3)(a) or (b)1., F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (no exempt units at facility)</p>
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Additional Requirements for Title V Air Operation Permit Applications N/A

<p>1. List of Insignificant Activities (Required for initial/renewal applications only): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application)</p>
<p>2. Identification of Applicable Requirements (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable (revision application with no change in applicable requirements)</p>
<p>3. Compliance Report and Plan (Required for all initial/revision/renewal applications): <input type="checkbox"/> Attached, Document ID: _____ Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.</p>
<p>4. List of Equipment/Activities Regulated under Title VI (If applicable, required for initial/renewal applications only): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input type="checkbox"/> Not Applicable</p>
<p>5. Verification of Risk Management Plan Submission to EPA (If applicable, required for initial/renewal applications only) : <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>
<p>6. Requested Changes to Current Title V Air Operation Permit: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable</p>

Additional Requirements Comment

Empty comment box

EMISSIONS UNIT INFORMATION

Section [1] of [2]

Cement Kiln No. 1

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [1] of [2]

Cement Kiln No. 1

A. GENERAL EMISSIONS UNIT INFORMATION**Title V Air Operation Permit Emissions Unit Classification**

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **Cement Kiln No. 1**

3. Emissions Unit Identification Number: **003**

4. Emissions Unit Status Code: A	5. Commence Construction Date: N/A	6. Initial Startup Date: N/A	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--	--	--	--

9. Package Unit:
Manufacturer:

Model Number:

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [1] of [2]

Cement Kiln No. 1

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
NO _x	032/205		EL

EMISSIONS UNIT INFORMATION

Section [1] of [2]
 Cement Kiln No. 1

POLLUTANT DETAIL INFORMATION

Page [1] of [1]
 Nitrogen Oxides

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 179.6 lb/hour 786.5 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 179.6 lb/hr Reference: proposed emissions limit (12-month rolling average)		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 179.6 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 786.5 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

EMISSIONS UNIT INFORMATION

Section [1] of [2]
Cement Kiln No. 1

POLLUTANT DETAIL INFORMATION

Page [1] of [1]
Nitrogen Oxides

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 179.6 lb/hr (12-month rolling average)	4. Equivalent Allowable Emissions: 179.6 lb/hour* 786.5 tons/year*
5. Method of Compliance: NOx CEMS	
6. Allowable Emissions Comment (Description of Operating Method): *Hourly and annual emissions limits are on a 12-month rolling average. Limits are based on avoiding PSD (based on 2005 PSD application).	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [1] of [2]

Cement Kiln No. 1

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>10/05</u>
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>10/05</u>
3. Detailed Description of Control Equipment (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>10/05</u>
4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>10/05</u> <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [1] of [2]

Cement Kiln No. 1

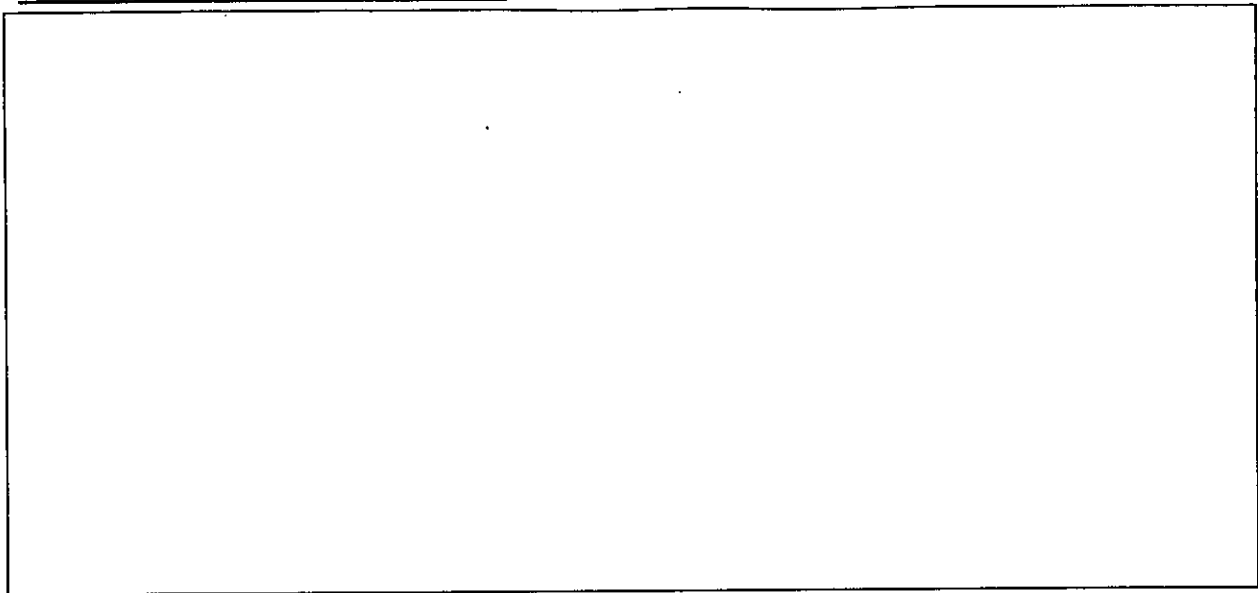
Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications N/A

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable

Additional Requirements Comment



EMISSIONS UNIT INFORMATION

Section [2] of [2]

Cement Kiln No. 2

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application for air permit. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised/renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. **The air construction permitting classification must be used to complete the Emissions Unit Information Section of this application for air permit.** A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air construction permitting and insignificant emissions units are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

EMISSIONS UNIT INFORMATION

Section [2] of [2]

Cement Kiln No. 2

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)

The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in this Section: (Check one)

This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section: **Cement Kiln No. 2**

3. Emissions Unit Identification Number: **014**

4. Emissions Unit Status Code: A	5. Commence Construction Date: N/A	6. Initial Startup Date: N/A	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	--	--	--	--

9. Package Unit:
Manufacturer: _____ Model Number: _____

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment:

EMISSIONS UNIT INFORMATION

Section [2] of [2]

Cement Kiln No. 2

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
NO _x	032/205		EL

EMISSIONS UNIT INFORMATION

Section [2] of [2]
Cement Kiln No. 2

POLLUTANT DETAIL INFORMATION

Page [1] of [1]
Nitrogen Oxides

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Complete for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control:	
3. Potential Emissions: 179.6 lb/hour 786.5 tons/year		4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5. Range of Estimated Fugitive Emissions (as applicable): to tons/year			
6. Emission Factor: 179.6 lb/hr Reference: proposed emissions limit (12-month rolling average)		7. Emissions Method Code: 0	
8.a. Baseline Actual Emissions (if required): tons/year		8.b. Baseline 24-month Period: From: To:	
9.a. Projected Actual Emissions (if required): tons/year		9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years	
10. Calculation of Emissions: 179.6 lb/hr x 8,760 hr/yr x 1 ton/2,000 lb = 786.5 TPY			
11. Potential, Fugitive, and Actual Emissions Comment:			

EMISSIONS UNIT INFORMATION

Section [2] of [2]
Cement Kiln No. 2

POLLUTANT DETAIL INFORMATION

Page [1] of [1]
Nitrogen Oxides

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: ESCPSD	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units: 179.6 lb/hr (12-month rolling average)	4. Equivalent Allowable Emissions: 179.6 lb/hour* 786.5 tons/year*
5. Method of Compliance: NOx CEMS	
6. Allowable Emissions Comment (Description of Operating Method): *Hourly and annual emissions limits are on a 12-month rolling average. Limits are based on avoiding PSD (based on 2005 PSD application).	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

Allowable Emissions Allowable Emissions of

1. Basis for Allowable Emissions Code:	2. Future Effective Date of Allowable Emissions:
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance:	
6. Allowable Emissions Comment (Description of Operating Method):	

EMISSIONS UNIT INFORMATION

Section [2] of [2]

Cement Kiln No. 2

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Process Flow Diagram (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>10/05</u>
2. Fuel Analysis or Specification (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>10/05</u>
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4. Procedures for Startup and Shutdown (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date _____ <input checked="" type="checkbox"/> Not Applicable (construction application)
5. Operation and Maintenance Plan (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <u>10/05</u> <input type="checkbox"/> Not Applicable
6. Compliance Demonstration Reports/Records <input type="checkbox"/> Attached, Document ID: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> Previously Submitted, Date: _____ Test Date(s)/Pollutant(s) Tested: _____ <input type="checkbox"/> To be Submitted, Date (if known): _____ Test Date(s)/Pollutant(s) Tested: _____ <input checked="" type="checkbox"/> Not Applicable <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
7. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

EMISSIONS UNIT INFORMATION

Section [2] of [2]

Cement Kiln No. 2

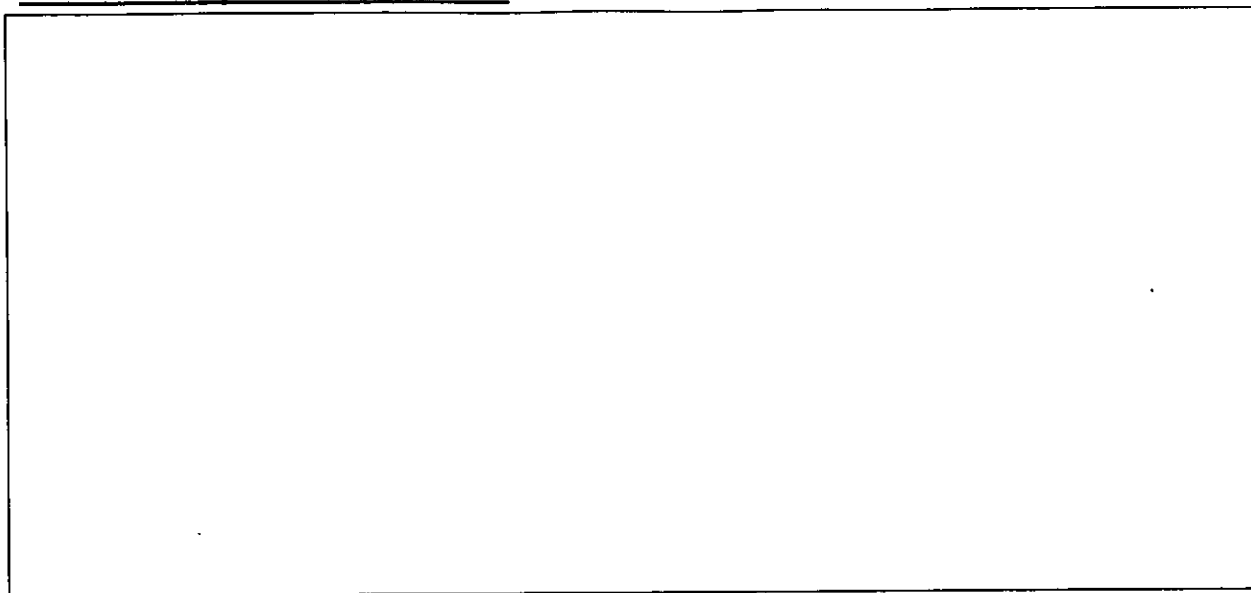
Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rule 62-212.400(4)(d), F.A.C., and Rule 62-212.500(4)(f), F.A.C.) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Additional Requirements for Title V Air Operation Permit Applications N/A

1. Identification of Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
5. Acid Rain Part Application <input type="checkbox"/> Certificate of Representation (EPA Form No. 7610-1) <input type="checkbox"/> Copy Attached, Document ID: _____ <input type="checkbox"/> Acid Rain Part (Form No. 62-210.900(1)(a)) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously Submitted, Date: _____ <input type="checkbox"/> Not Applicable

Additional Requirements Comment



ATTACHMENT A
DESCRIPTION OF PROPOSED PROJECT

ATTACHMENT A
DESCRIPTION OF PROPOSED PROJECT

CEMEX Cement, Inc. (CEMEX), operates a Portland cement manufacturing plant in Brooksville, Florida. The Cement Kilns Nos. 1 (EU 003) and 2 (EU 014) were recently permitted (Permit No. 0530010-026-AC) to install an indirect firing system, low-NO_x burners, and SNCR. That construction permit limits NO_x emissions (condition 5) to 1.21 pounds per ton (lb/ton) of dry preheater feed and 181.5 lb/hr (NO₂) on a 30-day rolling average. CEMEX is required to achieve this emission rate by June 30, 2007, which is the expiration date of the permit. CEMEX is now requesting the following:

- A 2-year extension of Permit No. 0530010-026-AC; and
- A revision of the NO_x emission limit to be 179.6 lb/hr and 786.5 TPY (both on a 12-month rolling average).

The basis for this request is discussed further below.

CEMEX is requesting a 2-year extension of the construction permit to allow additional time to complete the installation of the Indirect Firing System to achieve reduced NO_x emissions on a continuous basis. CEMEX is still moving forward with this project and has been able to achieve reduced NO_x emissions. As shown in the attached Figure 1 (see also data including the minimum, maximum, and average for each kiln in Table 1), CEMEX has recently been able to achieve the lower NO_x limit of 1.21 lb/ton preheater feed. However, without the installation of the indirect firing system, CEMEX cannot guarantee continuous compliance with the reduced NO_x limit.

In addition, CEMEX is requesting a revision to the NO_x limit contained in the referenced construction permit to remove the lb/ton limit. Since the NO_x emission limits for both Kiln No. 1 and Kiln No. 2 were established to avoid PSD, and not as BACT, CEMEX is requesting NO_x emission limits stated in terms of pounds per hour (lb/hr) and tons per year (TPY) only. The NO_x limit of 1.21 lb/ton preheater feed can be included as an equivalent emission limit but not as an enforceable limit.

The rationale for this request is that the annual NO_x emission limit from each kiln was established at 786.5 TPY to avoid a PSD review; including the avoidance of a BACT determination. This being the case, the only assurance the Department needs is that the annual NO_x emissions from each kiln will not exceed 786.5 TPY.

To achieve this assurance, it is suggested that the permit contain an hourly NO_x emissions limit of 179.6 lb/hr (786.5 TPY divided by 8,760 hours per year) and annual emission limit of 786.5 TPY, both 12-month rolling averages. These limits can be verified with the certified NO_x CEMS.

A precedent was set by the Department setting an annual average NO_x emission rate for the Titan America Pensuco plant in Dade County. Excerpts from the Technical Evaluation and Preliminary Determination (TEPD) for Titan America Permit 0250020-016-AC and from that permit (dated April 5, 2005) are included as Attachment B. In the excerpt from the TEPD, the pollutant netting analysis is presented documenting PSD avoidance and the excerpt from the permit shows permit limits for NO_x, SO₂, CO, VOC, and acid mist all with 12-month rolling average limits. CEMEX is also requesting a 12-month rolling average.

In summary, the 30-day rolling average NO_x emission limits for Kiln No. 1 and Kiln No. 2 of 1.21 lb/ton of preheater feed and 181.5 lb/hr should be changed to 179.6 lb/hr and 786.5 TPY, 12-month rolling averages. Compliance with these limits will be demonstrated with the NO_x CEMS on each kiln. It should be noted that in calculating these averages, all hours in the year will be used; both hours when a kiln is operating and hours when a kiln is not operating (i.e., zero NO_x emissions). This is because the 179.6 lb/hr limit is based on 8,760 hr/yr of operations ($179.5 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 / 2,000 \text{ lb/ton} = 786.5 \text{ TPY}$). It is also noted that Al Linero stated that the NO_x limit contained in the referenced construction permit is the lowest NO_x limit of any preheater kiln in the country using SNCR.

Figure 1. Summary of NOx CEMS Data for Kiln 1 and Kiln 2

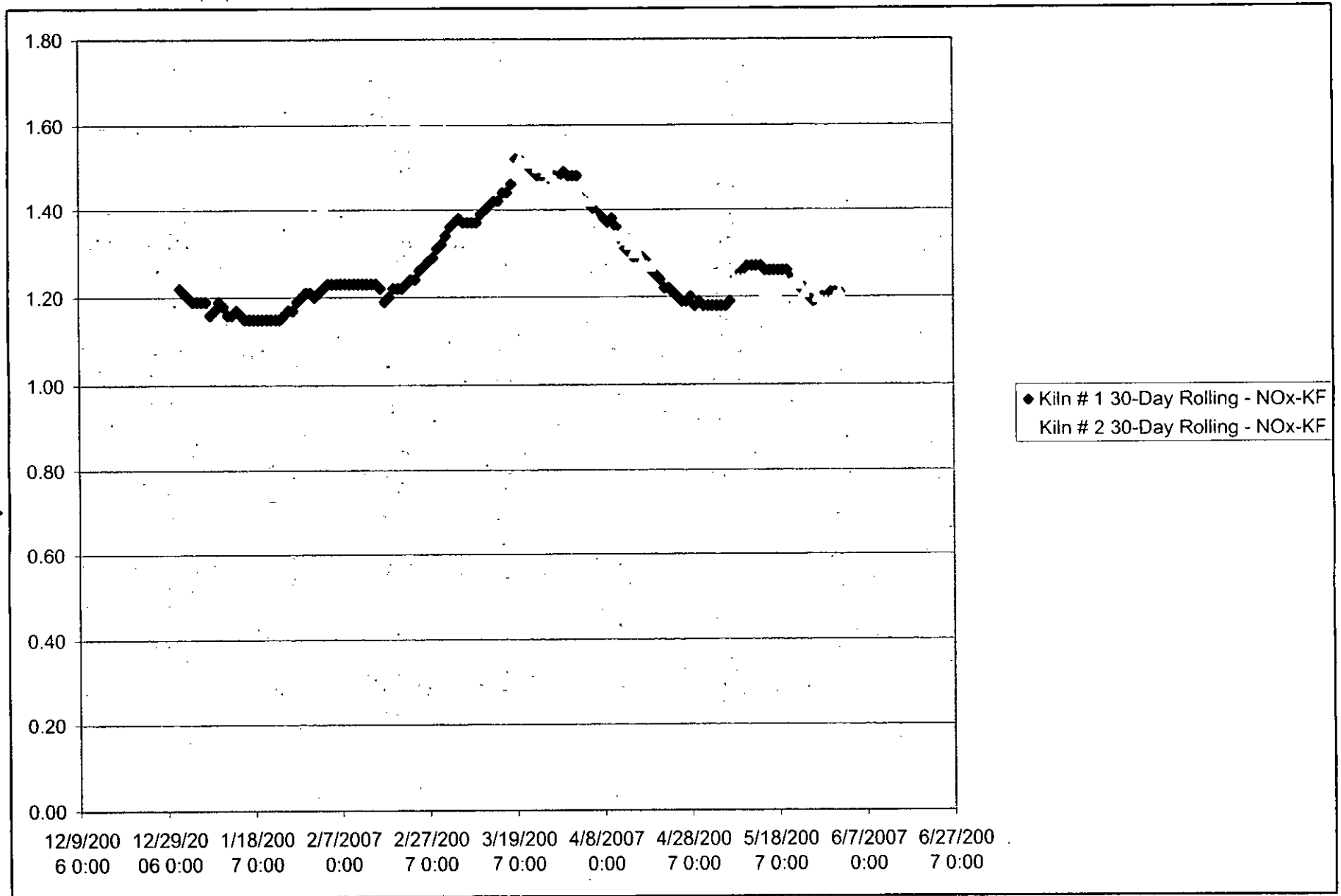


Table 1. Summary of 30-Day Rolling Average NOx CEMS Data- Kilns 1 and 2
CEMEX Brooksville

Date/Time	Kiln # 1 30-Day Rolling - NOx-KF	Kiln # 2 30-Day Rolling - NOx-KF
1/1/2007 0:00	1.22	1.25
1/2/2007 0:00	1.21	1.25
1/3/2007 0:00	1.20	1.26
1/4/2007 0:00	1.19	1.26
1/5/2007 0:00	1.19	1.26
1/6/2007 0:00	1.19	1.26
1/7/2007 0:00	1.19	1.26
1/8/2007 0:00	1.16	1.27
1/9/2007 0:00	1.17	1.26
1/10/2007 0:00	1.19	1.26
1/11/2007 0:00	1.18	1.26
1/12/2007 0:00	1.16	1.26
1/13/2007 0:00	1.16	1.26
1/14/2007 0:00	1.17	1.25
1/15/2007 0:00	1.16	1.24
1/16/2007 0:00	1.15	1.24
1/17/2007 0:00	1.15	1.24
1/18/2007 0:00	1.15	1.25
1/19/2007 0:00	1.15	1.24
1/20/2007 0:00	1.15	1.24
1/21/2007 0:00	1.15	1.25
1/22/2007 0:00	1.15	1.26
1/23/2007 0:00	1.15	1.27
1/24/2007 0:00	1.15	1.27
1/25/2007 0:00	1.16	1.28
1/26/2007 0:00	1.17	1.30
1/27/2007 0:00	1.17	1.32
1/28/2007 0:00	1.19	1.34
1/29/2007 0:00	1.20	1.36
1/30/2007 0:00	1.21	1.38
1/31/2007 0:00	1.21	1.39
2/1/2007 0:00	1.20	1.38
2/2/2007 0:00	1.21	1.39
2/3/2007 0:00	1.22	1.41
2/4/2007 0:00	1.23	1.42
2/5/2007 0:00	1.23	1.43
2/6/2007 0:00	1.23	1.44
2/7/2007 0:00	1.23	1.45
2/8/2007 0:00	1.23	1.46
2/9/2007 0:00	1.23	1.47
2/10/2007 0:00	1.23	1.49
2/11/2007 0:00	1.23	1.50
2/12/2007 0:00	1.23	1.52
2/13/2007 0:00	1.23	1.53
2/14/2007 0:00	1.23	1.55
2/15/2007 0:00	1.23	1.55
2/16/2007 0:00	1.22	1.56

Table 1. Summary of 30-Day Rolling Average NOx CEMS Data- Kilns 1 and 2
CEMEX Brooksville

Date/Time	Kiln # 1 30-Day Rolling - NOx-KF	Kiln # 2 30-Day Rolling - NOx-KF
2/17/2007 0:00	1.19	1.58
2/18/2007 0:00	1.20	1.59
2/19/2007 0:00	1.22	1.62
2/20/2007 0:00	1.22	1.62
2/21/2007 0:00	1.22	1.62
2/22/2007 0:00	1.23	1.62
2/23/2007 0:00	1.24	1.62
2/24/2007 0:00	1.24	1.60
2/25/2007 0:00	1.26	1.59
2/26/2007 0:00	1.27	1.58
2/27/2007 0:00	1.28	1.58
2/28/2007 0:00	1.29	1.57
3/1/2007 0:00	1.31	1.57
3/2/2007 0:00	1.32	1.58
3/3/2007 0:00	1.34	1.59
3/4/2007 0:00	1.36	1.58
3/5/2007 0:00	1.37	1.58
3/6/2007 0:00	1.38	1.58
3/7/2007 0:00	1.37	1.58
3/8/2007 0:00	1.37	1.58
3/9/2007 0:00	1.37	1.58
3/10/2007 0:00	1.37	1.58
3/11/2007 0:00	1.39	1.58
3/12/2007 0:00	1.40	1.58
3/13/2007 0:00	1.41	1.58
3/14/2007 0:00	1.42	1.58
3/15/2007 0:00	1.42	1.58
3/16/2007 0:00	1.44	1.58
3/17/2007 0:00	1.44	1.58
3/18/2007 0:00	1.46	1.58
3/19/2007 0:00	1.52	1.58
3/20/2007 0:00	1.52	1.52
3/21/2007 0:00	1.51	1.51
3/22/2007 0:00	1.50	1.52
3/23/2007 0:00	1.49	1.51
3/24/2007 0:00	1.48	1.50
3/25/2007 0:00	1.48	1.50
3/26/2007 0:00	1.48	1.49
3/27/2007 0:00	1.47	1.48
3/28/2007 0:00	1.48	1.47
3/29/2007 0:00	1.48	1.46
3/30/2007 0:00	1.49	1.45
3/31/2007 0:00	1.48	1.44
4/1/2007 0:00	1.48	1.44
4/2/2007 0:00	1.48	1.44
4/3/2007 0:00	1.43	1.43
4/4/2007 0:00	1.42	1.42

Table 1. Summary of 30-Day Rolling Average NOx CEMS Data- Kilns 1 and 2
CEMEX Brooksville

Date/Time	Kiln # 1 30-Day Rolling - NOx-KF	Kiln # 2 30-Day Rolling - NOx-KF
4/5/2007 0:00	1.41	1.42
4/6/2007 0:00	1.40	1.38
4/7/2007 0:00	1.39	1.35
4/8/2007 0:00	1.38	1.34
4/9/2007 0:00	1.37	1.33
4/10/2007 0:00	1.38	1.34
4/11/2007 0:00	1.36	1.34
4/12/2007 0:00	1.33	1.34
4/13/2007 0:00	1.31	1.33
4/14/2007 0:00	1.30	1.32
4/15/2007 0:00	1.29	1.30
4/16/2007 0:00	1.29	1.30
4/17/2007 0:00	1.29	1.28
4/18/2007 0:00	1.28	1.27
4/19/2007 0:00	1.26	1.27
4/20/2007 0:00	1.25	1.30
4/21/2007 0:00	1.24	1.31
4/22/2007 0:00	1.22	1.30
4/23/2007 0:00	1.22	1.30
4/24/2007 0:00	1.21	1.30
4/25/2007 0:00	1.20	1.30
4/26/2007 0:00	1.19	1.28
4/27/2007 0:00	1.19	1.27
4/28/2007 0:00	1.20	1.26
4/29/2007 0:00	1.18	1.27
4/30/2007 0:00	1.19	1.27
5/1/2007 0:00	1.18	1.25
5/2/2007 0:00	1.18	1.25
5/3/2007 0:00	1.18	1.25
5/4/2007 0:00	1.18	1.25
5/5/2007 0:00	1.18	1.25
5/6/2007 0:00	1.18	1.25
5/7/2007 0:00	1.19	1.26
5/8/2007 0:00	1.24	1.24
5/9/2007 0:00	1.25	1.24
5/10/2007 0:00	1.26	1.24
5/11/2007 0:00	1.27	1.24
5/12/2007 0:00	1.27	1.24
5/13/2007 0:00	1.27	1.24
5/14/2007 0:00	1.27	1.23
5/15/2007 0:00	1.26	1.21
5/16/2007 0:00	1.26	1.20
5/17/2007 0:00	1.26	1.20
5/18/2007 0:00	1.26	1.20
5/19/2007 0:00	1.26	1.22
5/20/2007 0:00	1.26	1.23
5/21/2007 0:00	1.24	1.23

Table 1. Summary of 30-Day Rolling Average NOx CEMS Data- Kilns 1 and 2
CEMEX Brooksville

Date/Time	Kiln # 1 30-Day Rolling - NOx-KF	Kiln # 2 30-Day Rolling - NOx-KF
5/22/2007 0:00	1.23	1.24
5/23/2007 0:00	1.22	1.23
5/24/2007 0:00	1.22	1.21
5/25/2007 0:00	1.20	1.22
5/26/2007 0:00	1.19	1.22
5/27/2007 0:00	1.19	1.20
5/28/2007 0:00	1.20	1.19
5/29/2007 0:00	1.20	1.19
5/30/2007 0:00	1.21	1.19
5/31/2007 0:00	1.21	1.20
6/1/2007 0:00	1.21	1.21
Maximum =	1.52	1.62
Minimum =	1.15	1.19
Average =	1.27	1.38

ATTACHMENT B

**EXCERPTS FROM TITAN AMERICA
PERMIT NO. 0250020-016-AC**

From the Technical Evaluation and Preliminary Determination for Titan America Permit 0250020-016-AC, dated April 5, 2005:

VII. PROJECT EMISSION INCREASES AND DECREASES

Titan updated the previous contemporaneous emissions calculations that had been submitted in 1998 in support of the modernization project. Following is a recap of the actual emission decreases and the potential emission increases in tons per year (TPY). As previously mentioned, the most recent request by Tarmac affects only PM/PM₁₀.

Pollutant	Increases Dry Process at Proposed Capacity	Decreases Wet Process Actual Emissions	Net Increases (Decreases)	PSD Significant Emission Rate
PM	368	366	2	25
PM ₁₀	321	315	6	15
SO ₂	806	1,432	(626)	40
NO _x	1,953	2,284	(331)	40
CO	1,457	1,368	89	100
VOC	155	131	25	40
H ₂ SO ₄	8.9	257	(248)	7
Hg	0.0149	0.0236	(0.0087)	0.1
Pb	0.0465	0.0393	0.0071	0.6

Actual emissions are likely to be much lower for PM/PM₁₀, CO, and SO₂ based on the emission test results discussed in the previous section. NO_x emissions are likely to be significantly less than estimated above. Hg emissions are likely to be somewhat greater than estimated above. However they will not exceed the significant emission rate of 200 lb/year.

From Titan Permit 0250020-016-AC:

B.23 SO₂, NO_x, CO, VOC, and SAM Emission Limits: The emissions from the Raw Mill/Fireprocessing system shall not exceed the limits shown in the following table.

Pollutant	Allowable Emissions		Emission Limits in lbs. ton of clinker		Monitors
	12-month rolling average in TPY ^(a)	Lbs./hr 24-hr average	24-hr avg. @200 TPH of clinker production (5)	24-hr average @250 TPH of clinker production	
SO ₂	806	520	1.54	1.28	CEM
NO _x	1953	720	3.45	2.88	CEM
CO ^(a)	1457	574	2.74	2.30	Process
VOC	155	40	0.19	0.16	CEM
SAM	8.48	2.24	0.009	0.008	-

Notes:

- ^(a) The 12-month rolling average in TPY would be the average of the daily values for the current month and the preceding 11 months. The averages shall be based on the operating days or hours, and shall exclude days or hours in which the plant is not operating.
- ^(b) The averaging time for CO corresponds to the required length of sampling for the initial and subsequent emission tests.

[Rule: 62-4.070(3) and 62-212.400, F.A.C.; Permit 0250020-016-AC]