

Florida Department of Environmental Protection

Bob Martinez Center 2600 Blairstone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor Jeff Kottkamp Lt. Governor Michael W. Sole Secretary

August 3, 2007

Electronically sent – Received Receipt requested.

michaelanthony.gonzales@cemexusa.com Mr. Michael A. Gonzales, Plant Manager Brooksville Cement Plant CEMEX Cement, Inc. 16301 Ponce De Leon Boulevard Brooksville, Florida 34614-0849

Re: DEP File No. 0530010-018-AC

Brooksville Cement Plant - Lines 1 and 2

Dear Mr. Gonzales:

Enclosed is the draft air construction permit (Draft Permit) to install cooling dampers on Kiln 1 and to make various operational changes on Lines 1 and 2 at the Brooksville Cement Plant in Hernando County. The Department's Intent to Issue Air Construction Permit, the Technical Evaluation, and the Public Notice of Intent to Issue Air Construction Permit are included.

The Public Notice must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to the requirements of Chapter 50, Florida Statutes. Proof of publication, such as a newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A.A. Linero, Program Administrator, at the letterhead address. If you have any questions regarding this matter, please contact Teresa Heron at (850)921-9529, Debbie Nelson at (850)921-9537, or Mr. Linero at (850)921-9523.

Sincerely,

Trina Vielhauer, Chief Bureau of Air Regulation

TLV/aal/th

Enclosures

In the Matter of an Application for Permit by:

Mr. Michael Gonzales, Plant Manager Brooksville Cement Plant CEMEX Cement, Inc. 16301 Ponce De Leon Boulevard Brooksville, Florida 34614-0849 DEP File No. 0530010-018-AC
Brooksville Cement Plant
Portland Cement Lines 1 and 2
Kiln 1 Cooling Dampers
Operational Changes
Hernando County, Florida

INTENT TO ISSUE AIR CONSTRUCTION PERMIT

The Department of Environmental Protection (the Department) gives notice of its intent to issue an air construction permit (copy of draft permit enclosed) to CEMEX Cement, Inc. for the proposed project as detailed in the application specified above and the attached Technical Evaluation for the reasons stated below.

CEMEX applied to the Department for an air construction permit to install cooling dampers on Kiln 1 for the control of dioxin/furan formation. CEMEX also requested through other applications a number of operational changes on Lines 1 and 2 including transfer and loading rates within the process. These additional requests were consolidated with the present application.

The Department has permitting jurisdiction under the provisions of Chapter 403.087 Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit is required.

The Department intends to issue this air construction permit based on the belief that reasonable assurances have been provided to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit. The notice shall be published one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

DEP File No. 0530010-018-AC Brooksville Cement Plant, Lines 1 and 2 Page 2 of 3

The Department will issue the final construction permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of the enclosed Public Notice. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the construction permit with the attached conditions unless a timely petition for an administrative determination (hearing) is filed pursuant to sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S., must be filed within 14 days of publication of the public notice or within 14 days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and (g) A statement of the

DEP File No. 0530010-018-AC Brooksville Cement Plant, Lines 1 and 2 Page 3 of 3

relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.

Trina L. Vielhauer, Chief Bureau of Air Regulation

June Villaus

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Intent to Issue Air Construction Permit (including the Public Notice, Technical Evaluation, and the Draft permit) and all copies were sent electronically (with Received Receipt) before the close of business on August 3, 2007 to the persons listed:

Michael A. Gonzales, CEMEX: michaelanthony.gonzales@cemexusa.com

Charles Walz, CEMEX: charles.walz@cemexusa.com Amarjits Gill, CEMEX: amarjits.gill@ccmexusa.com Mara Nasca, DEP SWD: mara.nasca@dep.state.fl.us

John Koogler, P.E. K&A: jkoogler(@)kooglerassociates.com Fawn Bergen, P.E., K&A: fbergen@kooglerassociates.com Administrator, Hernando County gkuhl@hernandocounty.us Segundo J. Fernandez, Esq., OHF&C: sfernandez@ohfc.com Jim Little, EPA Region 4: little.james@epamail.epa.gov

Kathy Forney, EPA Region 4: forney.kathleen@epamail.epa.gov

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby

acknowledged.

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP File No. 0530010-018-AC

CEMEX Cement, Inc.
Brooksville Cement Plant Lines 1 and 2

Hernando County

The Department of Environmental Protection (the Department) gives notice of its intent to issue an air construction permit to CEMEX Cement, Inc. to install cooling dampers and make additional operational changes at the Brooksville Cement Plant on Highway 98, northwest of Brooksville in Hernando County. A determination of best available control technology was not required. The applicant's name and business address are CEMEX Cement, Inc., 16301 Ponce De Leon Boulevard, Brooksville, Florida 34614-0849.

The plant currently consists of: two portland cement lines designated as Lines 1 and 2, including two dry process preheater kilns (Kilns 1 and 2), two clinker coolers, associated raw mills, finish mills, cement and clinker handling equipment, coal handling equipment, silos, air pollution control devices, raw material extraction and receiving facilities and product shipping facilities.

The purpose of the dampers is to supply cooling air to rapidly quench exhaust gas from Kiln 1 to temperatures less than those characteristic of dioxin and furan formation.

Additional changes included in this action are: a change to the liquid fuel sampling requirements for Kilns 1 and 2; an the increase in the operating hours for the cement bag loadout system; and increases of the transfer and loading rates for the finish mills and various raw material and product storage bins and silos. No increases in kiln operation rates are required as a result of the operational changes.

The Department will issue the final air construction permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 14 days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative determination (hearing) is filed pursuant to sections 120.569 and 120.57 of the Florida Statutes (F.S.), before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3), F.S., must be filed within 14 days of publication of the public notice or

within 14 days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention in a proceeding (initiated by another party) will be only at the discretion of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action, including an explanation of how the alleged facts relate to the specific rules or statutes; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection

Bureau of Air Regulation 111 S. Magnolia Drive, Suite 4 Tallahassee, Florida, 32301

Telephone: 850/488-0114

Fax: 850/922-6979

Department of Environmental Protection

Southwest District Office 13051 N. Telecom Parkway

Temple Terrace, Florida 33637-0926

Telephone: 813/744-6100

Fax: 813/744-6084

The complete project file includes the permit application, draft air construction permit, technical evaluation, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Department's reviewing engineer for this project, Teresa Heron at MS 5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or Teresa.Heron@dep.state.fl.us, or call 850/921-9529 for additional information. Key documents may also be viewed at: www.dep.state.fl.us/Air/permitting/construction.htm and clicking on CEMEX in the cement plant category.

TECHNICAL EVALUATION

CEMEX Cement, Inc.
Brooksville Cement Plant

Cooling Damper Installation Operational Changes

Kilns 1 and 2

Hernando County

DEP File No. 0530010-018-AC



Department of Environmental Protection Division of Air Resource Management Bureau of Air Regulation

August 3, 2007

I. APPLICATION INFORMATION

A. APPLICANT

Michael A. Gonzales, Plant Manager CEMEX Cement, Inc. Brooksville Plant 16301 Ponce de Leon Blvd. Brooksville, Florida 34601

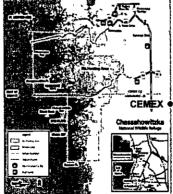
B. PROCESSING SCHEDULE

- The Department's Bureau of Air Regulation (BAR) received an application (0530010-018-AC) on October 14, 2005 that included requests to change thallium and fuel sampling requirements and to increase loading and transfer rates for raw material and product silos and bins.
- Additional requests under the same application to install indirect firing systems, new burners and selective non-catalytic reduction (SNCR) systems on Kilns 1 and 2 were processed separately through a permit (0530010-026-AC) issued on December 22, 2006.
- Additional requests under the same application related to petroleum coke and tire derived fuel were withdrawn or deferred by the applicant.
- The Department's Southwest District Office received an application (0530010-019-AC) on November 14, 2005 to install cooling dampers on Kiln 1.
- The Department received a request from the applicant dated August 15, 2006 requesting consolidation of the cooling damper application with application 0530010-018-AC.
- The Department issued and received responses to several requests for additional information. The final information was received on April 13, 2007.
- The Department received a request on July 11 from the applicant to waive the 90-day permit processing clock until July 25, 2007 to facilitate prompt revision and re-issuance of a separate draft permit for a new line at the facility.
- The Department distributed the Public Notice Package for project 0530010-018-AC on August 3, 2007.

C. FACILITY LOCATION

The CEMEX Brooksville Cement Plant is located on Highway 98, northwest of Brooksville in Hernando County. The following figure shows the location of the facility.





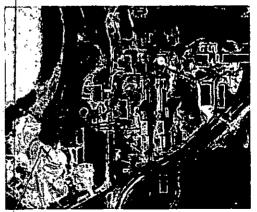


Figure 1. Location of CEMEX Brooksville Cement Plant, Chassahowitzka NWR, Aerial Photo

D. FACILITY CLASSIFICATION CODE (SIC)

Major Group No. 32, Clay, Glass, and Concrete Products Industry Group No. 324 Cement, Hydraulic

E. REGULATORY CATEGORIES

The following regulatory classifications apply to the subject facility:

Title I, Section 111, Clean Air Act (CAA): This facility is subject to certain Standards of Performance for New Stationary Sources. They are adopted and incorporated by reference in Rule 62-204.800, F.A.C. These include:

- 40 CFR 60, Subpart A General Provisions.
- 40 CFR 60, Subpart F Standards of Performance for Portland Cement Plants. Certain requirements from Subpart F are replaced by requirements from 40 CFR 63, Subpart LLL listed below.
- 40 CFR 60, Subpart Y Standards of Performance for Coal Preparation Plants.
- 40 CFR 60, Subpart OOO New Source Performance Standards For Nonmetallic Mineral Processing Plants.

Title I, Section 112 CAA: The facility has the potential to emit 10 tons per year or more of any one hazardous air pollutant (HAP) or 25 tons per year or more of any combination of HAPs. This facility is subject to the Major Source provisions of:

- 40 CFR 63, Subpart A National Emission Standards for Hazardous Air Pollutants General Provisions.
- 40 CFR 63, Subpart LLL National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry.

Title I, Part C: The facility is located in an area designated as "attainment", "maintenance", or "unclassifiable" for each pollutant subject to a National Ambient Air Quality Standard. The facility is considered a "portland cement plant", which is one of the 28 Prevention of Significant Deterioration (PSD) source categories with the lower PSD applicability threshold of 100 tons per year. Potential emissions of at least one regulated pollutant exceed 100 tons per year. Therefore, the facility is classified as a PSD-major source of air pollution with respect to Rule 62-212.400, F.A.C., Prevention of Significant Deterioration.

Title IV, CAA: The facility does not operate any units subject to the Acid Rain provisions of the CAA.

Title V, CAA: The facility is a Title V or "Major Source" of air pollution because the potential emissions of at least one regulated pollutant exceed 100 tons per year or because it is a major source of HAP. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_X), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

State Rules: The cement plant is subject to state Rule 62-296.407, F.A.C. (Portland Cement Plants).

Given that the facility is a Major Stationary Source with respect to the PSD regulations, then project emissions greater than 40 TPY of NO_X, VOC or SO₂, 7 TPY of sulfuric acid mist (SAM), 25/15 TPY of PM/PM₁₀, 3 TPY of fluorides, 0.1 TPY of mercury (Hg) or 1200 pounds per year (lb/yr) of lead (Pb) also require review pursuant to the PSD rules. Pollutants triggering these values require a determination of Best Available Control Technology (BACT) per Rule 62-212.400, F.A.C.

F. FACILITY DESCRIPTION

The existing Brooksville portland cement plant consists of two lines (Lines 1 and 2). Lines 1 and 2 include Polysius GEPOL preheater kilns (Kilns 1 and 2) and clinker cooler (Coolers 1 and 2). A picture of one of the kilns with preheater tower and raw meal homogenizing silo can be seen in Figure 2. Lines 1 and 2 are separately permitted with respect to preheater material feed rates and fuel heat input rates. Ancillary equipment at the plant includes a quarry, raw material handling and conveying equipment, raw mills, finish mills, cement and clinker handling equipment, coal handling equipment and silos, and particulate control/dust collection and recycling equipment.

Large, fabric filter systems (baghouses) are used to capture PMPM₁₀ from each kiln and from each clinker cooler (four total). Smaller baghouses are used to limit particulate emissions from other process emissions points. Raw material properties, chemical reactions in the kilns, absorption into the clinker, and combustion controls minimize emissions of NO_X, SO₂, CO, and VOC. Further NO_X control is provided by recently installed Pillard Low NO_X main kiln burners and selective non-catalytic reduction (SNCR) systems.

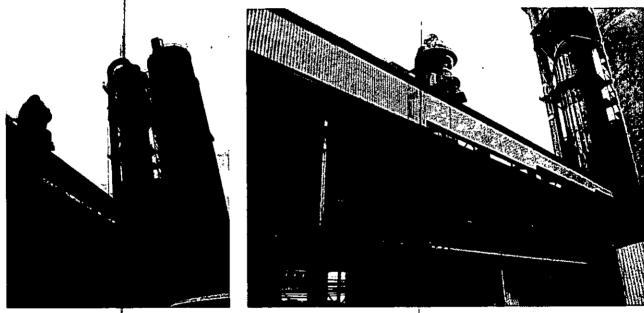


Figure 2. Polysius GEPOL Preheater Kiln at CEMEX Brooksville Plant

Both CEMEX Brooksville kilns are limited to 150 tons dry preheater feed per hour (30 day average) with a maximum of 165 tons preheater feed in any given hour. Both kilns are permitted to burn a variety of fuels, including coal, No. 2 fuel oil, No. 4 fuel oil, No. 5 fuel oil, No. 6 fuel oil, natural gas, and on-site generated, non-hazardous waste used oil, grease, and rags. Kiln No. 1 is also permitted to fire whole tire derived fuel (TDF) at a rate up to 20 percent of the total heat input.

G. APPLICATION REQUESTS

After withdrawal or deferment of some of the requests (petcoke and TDF) and separate processing of others (SNCR, burners and indirect firing), the remaining requests evaluated addressed in the present permitting action include:

• Increase the maximum transfer rate for Finish Mills 1 and 2 from 98 to 105 tons per hour (TPH);

- Reduce Finish Mills 1 and 2 <u>combined PM limit from 36 lb per hour (lb/hr) and 157.7 tons per year (TPY) to 9 lb/hr and 39.4 TPY from each mill;</u>
- Increase maximum loading rate of clinker silos 1, 2 and 3 from 84 to 93 TPH;
- Increase the raw material storage silos and feed system maximum transfer rate from 290 to 330 TPH (daily average, dry basis);
- Increase the raw material pre-mix bin maximum transfer rate from 290 to 330 TPH (daily average, dry basis);
- Increase the additive material storage bin maximum transfer rate from 30 to 36 TPH; and
- Increase the maximum operating hours of the cement bag loadout operation from 6,240 to 7,400 hours per year;
- Installation of two cooling dampers on Kiln 1;
- Removal of the Kiln 1 requirement for daily sampling for, and recording of thallium concentrations; and
- Allow use of liquid fuel suppliers' records in lieu of analysis of representative sample of each shipment (Permit No. 0530010-003-AC).

II. REGULATIONS THAT APPLY TO THE PROJECT

A. STATE REGULATIONS

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code. These include: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms); 62-212 (Preconstruction Review, PSD Review and BACT); 62-213 (Title V Air Operation Permits for Major Sources of Air Pollution); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures).

B. GENERAL PSD APPLICABILITY CRITERIA

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program in accordance with Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant; or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories defined in Rule 62-210.200, F.A.C.; or 5 tons per year of lead.

For new projects at existing PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the "Significant Emission Rates" (SER) defined in Rule 62-210.200, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and applicants must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant, and evaluate the air quality impacts.

Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several regulated pollutants that exceed the Significant Emission Rates.

The only PSD pollutant involved in this permitting action review is PM emissions changes as it relates to the different material handling baghouses transfer /production rates proposal.

III. ESTIMATES OF ÉMISSION INCREASES DUE TO PROJECTS

No increases in the kiln and cooler process and production rates have been requested or are expected. No emissions increases of the typical gaseous combustion products from pyroprocessing (e.g. NO_X, SO₂, VOC, CO) are requested or expected. The cooling dampers are for the purpose of controlling the manner by which cooling air is introduced in the area of the raw mill circuit to provide more rapid quenching of hot exhaust gases from the Kiln 1 preheater. In theory this additional temperature control is supposed to reduce the de novo formation of dioxin and furan (D/F) in the particulate control equipment (main baghouses).

The applicant has projected emissions of PM/PM₁₀ to increase from the previously described materials handling operations (except for Finish Mills 1 and 2). Table 1 is a list of the applicant's estimated past actual emissions from the affected emissions units compared with the future potential emissions from those units. Revisions by the Department are also shown.

Table 1. Comparison of Past Actual to Future Potential PM/PM₁₀ Emissions

<u>ı</u>				
Emission Unit No./Description	Permitted PM TPY	Past Actual PM/PM ₁₀ TPY	Future Potential PM/PM ₁₀ TPY	Project Increase (Decrease) PM/PM ₁₀ * TPY
E.U.005/Finish Mills 1 and 2 (both)	157.7	143.2 / 121.72	78.8 / 78.8**	(64.42) / (42.92)
E.U. 005/Finish Mills 1 and 2 (both) as Revised by Department	157.7	75 / 75	78.8 / 78.8	3 / 3
E.U.006/Clinker Storage Silos 1 and 2	5.72	1.53 / 1.44	5.72 / 5.72	4.19 / 4.28
E.U.011/Raw Material/Feed Silos	9.43	9.42 / 8.0	9.43 / 9.43	0.01 / 1.3
E.U.016/Clinker Storage Silo 3	5.95	5.78 / 4.91	5.95 / 5.95	0.17 / 1.04
E.U.024/Raw Material Pre-Mix Bin	2.54	2.52 / 2.14	2.54 / 2.54	0.02 / 0.40
E.U.025/Additive Material Storage Bin	11.30	10.30 / 8.76	11.30 / 11.30	1.0 / 2.54
E.U.026/Cement Bag Loadout System	1.87	1.36 / 1.16	2.22 / 2.22	0.86 / 1.06
Applicant's Estimate of Total PM/PM	10 Increase (De	crease)	1	(58.17) / (32.3)
Department Estimate of Increase after	revision of Est	timate for Finish	Mills 1 and 2	9.25 / 13.62

Difference between Past Actual to Future Potential. PSD significance level of PM/PM₁₀ = 25/15 TPY.

The Department does not dispute the estimates by the applicant except for those related to the finish mills. The finish mills are relatively large emissions units compared with the others listed. They have high flows and big baghouses. The estimates of past actual and permitted emissions for Finish Mills 1 and 2 provided by the applicant are based on calculations using the process weight table equations from Rule 62-296.320(4).

CEMEX Cement Inc.
Brooksville Plant

^{**} Future Potential to emit for Finish Mills 1 and 2 based on application request for enforceable lb/hr limitation.

The applicant did not submit test data and relied upon past annual emissions estimates submitted to the Department in annual operating reports. They conducted visible emissions testing to demonstrate compliance with an opacity limitation of 10%.

The Department does not expect an actual decrease in emissions from Finish Mills 1 and 2 because the production rates are actually increasing to a small degree and no physical projects are specified leading to an expectation of emissions reductions. However, there are some benefits from the recent operation and maintenance plans required by the portland cement industry maximum achievable control technology (MACT) standards under 40 CFR 63, Subpart LLL.

Essentially the reductions are not "real" although the revised potential emissions can be made enforceable. The Department assumes that emissions in the past are a little less than the requested (lower) future potential emissions limit requested by the applicant.

The Department will assume that without physical changes, the finish mills will not emit less PM/PM_{10} emissions than in the past and will assume the changes in PM/PM_{10} emissions for the project will be zero (0). That will also prevent future use of the "imaginary reductions" for the purposes of "netting" to avoid triggering the PSD rules on future projects that may actually increase emissions.

The revised Department estimates of PM and PM_{10} increases for the requested changes are 6.25 and 10.62 TPY respectively. These values are less than the SER of 25 and 15 TPY for PM and PM_{10} respectively. Therefore a PSD review and BACT determination are not required.

IV. DEPARTMENT REVIEW OF REQUESTS

A. TRANSFER AND PRODUCTION RATES INCREASES FOR MINOR SOURCES

All of the emissions units affected by the transfer and production rate increases are adequately controlled by baghouses. Except for the cement bag loadout system, the same lb/hr limit will continue to apply at each emissions unit in the future as presently applies. With the exception of the finish mills and in lieu of conducting stack tests on each emissions unit, the applicant may rely on visible emissions testing and meet an opacity limitation of 5 percent as provided by Department rules 62-297.620(4) together with 62-310(7)(c).

In the case of the finish mills, the Department will require an initial PM stack test and a simultaneous opacity test within the present fiscal year to demonstrate compliance with the revised PM/PM₁₀ emission limits of 9 lb/hr an opacity limit of 10%. After demonstrating compliance by the stack test, the applicant may thereafter request to satisfy the test requirement by meeting a 5% opacity limit. Until such a demonstration is made, the Department will require PM stack tests on an annual basis.

The requirements of 40 CFR 63, Subpart LLL apply to these emissions units. Accordingly, the applicant must, for each baghouse, maintain an operation and maintenance (O&M) plan to address proper operation, parametric monitoring, and a schedule for conducting periodic inspections and preventive maintenance. Baghouse inspections and maintenance activities shall be recorded in a written log. The O&M plan shall be submitted to the Department prior to any compliance tests for these units. Subpart LLL also requires adherence with and greater visible emissions testing frequency. This will insure more vigilance by the applicant regarding these emissions units to insure they comply with the 5% limitations.

The Department agrees with the requests to increase transfer and production rates for the specified non-pyroprocessing emissions units. The Department will issue a permit modification that will be a supplement to the previously issued permits.

B. COOLING DAMPERS

Part of this project is for the applicant's (after-the-fact) installation request of two dampers, 323E and 323N, for cooling the hot preheater gases from Kiln 1 to control dioxin and furans formation while the No. 1 Raw Mill is down. Dampers 323 E and 323N achieve the cooling required to control dioxin/furans formation. Damper 323 N is automatically controlled by the baghouse inlet temperature.

CEMEX provided the following details regarding the cooling dampers' operation: Damper 323 E will be in the open position when the No. 1 Raw Mill is down and in the closed position when the No. 1 Raw Mill is in operation. There are no variable positions for Damper 323 E; it is either in the open or closed position. Damper 323 N is controlled by an automatic damper positioner based on the baghouse inlet temperature.

The baghouse inlet temperature set point is based on the limitation established during the compliance test and does not vary (40 CFR 63.1444(b)).

Damper operation/position is indicated to the control room operator by percentage readout on the control monitor. There is redundancy in the baghouse inlet temperature. Two thermocouples exist for monitoring the baghouse inlet temperature. If the signal from the thermocouple is lost or otherwise determined to be in error the control room operator will refer to the secondary thermocouple reading.

The use of Dampers 323N and 323E to control the temperature of kiln gases bypassing the raw mill in the Kiln No. 1 system is not expected to measurably change the raw mill down gas flow rate as measured in the kiln stack. The purpose of these dampers is not to add additional cooling air to the system. The purpose is to add cooling air in a manner that will cool the bypassed gases quickly and uniformly. The placement of the dampers was based on Computational Fluid Dynamic (CFD) modeling and the effectiveness of the dampers has been demonstrated by subsequent D/F performance testing.

The applicant provided the results of D/F emissions testing conducted since 2003. These indicate reductions in D/F emissions following installation of the dampers. The Department does not necessarily agree or disagree that the entire cause or that the main cause of the D/F reductions is the installation of the dampers to reduce de novo D/F formation in the control equipment.

Department has technical reasons suggesting that other phenomena contributed to D/F formation. These include raw materials such as high carbon fly ash from nearby power plants that use low NO_X burners or otherwise do not achieve efficient combustion in their respective furnaces. Such carbon is typically measured as "loss on ignition" (LOI) and can theoretically catalyze or (together with chlorides in the ash or fuel) provide the precursors to D/F formation.

The Department believes the dampers at least help reduce D/F and approves their after-the-fact installation. CEMEX has stated that they are considering additional projects to further regulate and stabilize temperature to prevent D/F formation. The key option under consideration is installation of gas conditioning towers between the preheaters and control equipment consistent with industry practice.

CEMEX Cement Inc. Brooksville Plant

C. THALLIUM SAMPLING REQUIREMENTS

The requirement to conduct daily sampling for the semi-volatile metal, thallium (Tl), in the control equipment dust was included (at the request of the Hernando County Board of County Commissioners) in 1993 in conjunction with approval to burn tires in Kiln 1. The purpose was to control the tendency of Tl to build up in the external cycle of the preheater, raw mill, control equipment and feed silo.

According to the previous operator (Florida Mining and Manufacturing): "the Tl concentration is in the kiln/mill baghouse dust. We monitor the concentration of Tl on a daily basis and as we see the concentration increase, we remove a portion of the dust from the system and dispose of it in an authorized landfill. The removal is generally done on a day when the raw mill is down and the baghouse load is at minimum level, which conversely brings [SIC] the thallium concentration from the system with minimum level, which conversely brings the Tl concentration in the dust to maximum level. This allows us to remove maximum Tl from the system.

Immediately upon taking the raw mill down, we start to take samples of the baghouse dust every hour. These samples are analyzed by X-Ray Fluorescence (XRF) and the indicated concentration is recorded. When concentration level reaches approximately 0.8% we begin to load a tanker truck with the dust. We continue to monitor the concentration as the truck is being loaded and the final dust sample is taken at the end of the loading operation. The indicated concentration at the end of the truck loading will generally be in the 0.3% to 0.4% range. We average the first and last sample that went into the truck for the average concentration of the load. The normal average will be approximately 0.5% to 0.6% on the truck load of 14 to 16 tons of dust."

CEMEX now affirms that they have not wasted baghouse dust for the past four years for purpose of controlling the thallium concentration of the dust or for any other purpose (response to Request for Additional Information "RAI" March 1, 2006).

According to the RAI response, in the last 5 years none of the required tests have shown Tl concentrations that would exceed the permit limit of 1.5%. The monthly average Tl concentration for the two years period has been 0.31 percent and the range of individual thallium concentrations has been 0.02-1.33 %.

The applicant stated that the area currently being mined for limestone on the plant property has gradually turned toward the southwest over the last 6 years. The old mining area directly west of the plant was mined out and closed in the mid to late 1990's. According to CEMEX as its mining area has moved south/southwest of the plant area, the Tl levels have dropped in the limestone and the Tl concentrations in the baghouse dust have also dropped.

While Tl is not listed as a hazardous air pollutant (HAP), the values discussed above are seemingly high for this semi-volatile metal and would represent values in the dust of 200 to 13,000 ppm. By not removing dust, most Tl in the system is likely to be emitted from the stack (rather than via the hot clinker) together with any mercury (Hg) that may have been removed through processes analogous to those described for Tl.

The Department does not propose to make the requested changes.

D. FUEL SAMPLING REQUIREMENT

The applicant also requests to use the supplier's fuel analysis records for liquid fuels instead of conducting its own analysis of each sample representative of the shipment taken by CEMEX in accordance with the protocol given in the present permits. The applicant states that liquid fuels are only used to heat kilns during start up and comprise less than 1.5% of the total annual heat input to Kiln 1. Liquid fuel heating values and sulfur content are consistent. The permitted fuels are No. 2, No. 4, No. 5, No. 6 and on-specification used oil.

The Department agrees with this request but will require adherence to the same protocol regarding the properties of the oil used. The applicant will be required to maintain a purchasing specification applicable to shipment by its suppliers and records of compliance with those specifications.

E. Conclusions

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the Draft Permit. This determination is based on a technical review of the application, reasonable assurances provided by the applicant and the conditions specified in the Draft permit.

PERMITTEE:

CEMEX Cement, Inc. 16301 Ponce De Leon Boulevard Brooksville, Florida 34614-0849

Authorized Representative:
Michael Gonzales, Plant Manager

Air Permit No 0530010-018-AC
Brooksville Cement Plant
Facility ID No. 0530010
SIC No. 3241 Cement, Hydraulic
Cement Processing Lines 1 and 2
Permit Expires: June 30, 2008

PROJECT AND LOCATION

This permit authorizes the installation of cooling dampers on Kiln 1 and adjustments to the material loading and transfer rates for raw material and product silos and bins related to Lines 1 and 2. It also allows use of supplier-provided records in lieu of sampling by the operator of each shipment.

The Brooksville Cement Plant is located on Highway 98, northwest of Brooksville, in Hernando County, Florida.

STATEMENT OF BASIS

This permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to perform the proposed work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

CONTENTS

Section	 Genera 	1 Info	rmation
Section	i Genera	Linto	rmarion

- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

(DRAFT) ,	
Joseph Kahn, Director	(Date)
Division of Air Resource Mar	nagement

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of two Portland cement lines (Lines 1 and 2) including: two Polysius GEPOL preheater kilns (Kilns 1 and 2), two clinker coolers and associated raw mills, finish mills, cement and clinker handling equipment, coal handling equipment, silos, and air pollution control devices. The nominal capacity of each kiln is 780,000 tons per year of clinker.

This permit authorizes the installation of two cooling dampers on Kiln 1 and adjustments to the material loading and transfer rates for raw material and product silos and bins related to Lines 1 and 2. It also allows use of

The emissions units affected by this action are:

EU ID	Emissions Unit Description	
003	Cement Kiln No. 1	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
014	Cement Kiln No. 2	
005	Finish Mills 1 and 2	
006	Clinker Storage Silos 1 and 2	(1)
011	Raw Material Storage Silos and	Feed System
016	Clinker Storage Silos 3	
024	Raw Material Pre-Mix Bin	
025	Additive Material Storage Bin	
026	Cement Bag Loadout System	

REGULATORY CLASSIFIC

The facility is a major source of hazardous air pollutants (HAPs).

The facility is a Title V major source ution in accordance with Chapter 213, F.A.C.

(PSD-major source) in accordance with Rule 62-212.400, F.A.C.

The facility is a major stationary source (PSD-major source) in accordance with Kuie 02-212.400, 1.A.C.

The facility operates units subject to the Standards of Performance for New Stationary Sources pursuant to 40 CFR Part 60.

The facility of grates units subject to National Emissions Standards for Hazardous Air Pollutants pursuant to 40 CFR Part 63

The following relevant documents are not a part of this permit, but helped form the basis for this permitting action: the permit application and additional information received to make it complete; and the Department's Technical Evaluation and Preliminary Determination.

SECTION II. ADMINISTRATIVE REQUIREMENTS

- 1. <u>Permitting Authority</u>: The Permitting Authority for this project is the Bureau of Air Regulation in the Division of Air Resource Management of the Department. The mailing address for the Bureau of Air Regulation is 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400.
- 2. <u>Compliance Authority</u>: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office. The mailing address and phone number of the Southwest District Office is: 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926; 813-632-7600.
- 3. <u>Appendices</u>: The following Appendices are attached as part of this permit: Appendix BD (Final BACT Determinations and Emissions Standards); Appendix GC (General Conditions)! [Hilling]
- 4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
- 5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
- 6. Modifications: No emissions unit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

- a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
- b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), FAC, shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Title V Permit: This permit authorizes specific modifications and/or new construction on the affected emissions units as well as initial operation to determine compliance with conditions of this permit. A Title V operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after completing the required work and commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the Bureau of Air Regulation with copies to the Compliance Authority.

[Rules 62-4.030, 62-4.050, 62-4.220, and Chapter 62-213, F.A.C.]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Cement Kilns 1 and 2 (EU ID 003 and 014)

This section of the permit addresses the following existing emissions units.

Emissions Unit 003 and 014 (Kilns 1 and 2)

Description: Dry preheater process kiln and clinker cooler systems employing the Polysius GEPOL preheater design.

Fuels: Each kiln is limited to a fuel heat input of 300 million British thermal units (MMBtu) per hour. Allowable fuels include: coal, Nos. 2, 4, 5, and 6 fuel oil, natural gas, and on-site generated non-hazardous waste used oil and grease. Kiln No. 1 is also permitted to fire whole tire derived fuel:

Capacity: Each kiln is limited to 150 tons of preheater feed per hour (rolling 30-day average), with a maximum of 165 tons in any one hour, and a maximum annual limit of 14300,000 TPY.

Controls: A baghouse is used on each kiln for the control of particulate matter (PM) emissions. Raw material properties, chemical reactions in the kiln, absorption into the clinker, and combustion controls minimize emissions of nitrogen oxides (NO_X), sulfur dioxide (SO₂), carbon monoxide (CO) and volatile organic compounds (VOC). Selective non catalytic reduction (SNCR) systems have been installed on each kiln for NO_X control.

Monitors: Emissions of CO and NO_X are continuously monitored on both kilns.

Stack Parameters:

The stack for Kiln No. 1 has the following characteristics: stack height is 150 feet, exit diameter is 13 feet, exit temperature is 285 °F, and actual volumetric flow rate is approximately 315,000 acfm.

The stack for Kiln No. 2 has the following characteristics: stack height is 105 feet, exit diameter is 14 feet, exit temperature is 250 °F, and actual volumetric flow rately 315,000 acfm.

ADMINISTRATIVE REQUIREMENTS

1. Relation to Other Permits. The conditions of this permit subsection, supplement all previously issued air construction and operation permits for these emissions units. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of these permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, record keeping, reporting, etc. [Rule 62-4070] [FAC:]

EQUIPMENT DESCRIPTION

2. KilniNo.1 Cooling Dampers: [The permittee is authorized to install, operate, and maintain: two cooling dampers (designated as 323 E and 323 N) on the existing Kiln No. 1 bypass duct system; an automatic damper positioner for damper 323 N; and a damper monitoring system. The automatic damper positioner makes adjustments based on the current baghouse inlet temperature. Damper 323 N is automatically adjusted by the system to maintain the baghouse inlet temperature established during the most recent dioxin and furan (D/F) compliance test. Damper position is recorded on the programmable logic controller (PLC) in the control room. [Application; Design]

EMISSIONS AND TESTING REQUIREMENTS

3. Emissions Standards: This permit does not establish any new emissions standards or testing requirements for Kilns 1 and 2. These kilns shall continue to comply with the requirements of all existing, valid Department permits. [Rule 6-4.070 (3), F.A.C.]

A. Cement Kilns 1 and 2 (EU ID 003 and 014)

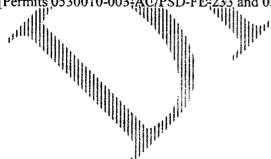
MONITORING AND RECORD KEEPING REQUIREMENTS

- 4. <u>Kiln No. 1 Cooling Damper Process Monitoring</u>: The following parameters shall be continuously monitored and recorded during all modes of operation including raw mill on and raw mill off, and all transition periods between operational modes:
 - a. The position of each damper associated with gas cooling for the purpose of D/F control (closed or position with respect to fully open);
 - b. Any monitored airflows within the bypass duct system; and
 - c. Any monitored temperature within the bypass duct system.

[Rule 62-4.070(3), F.A.C.]

- 5. <u>Kiln No. 1 Process Monitor Data</u>: For each parameter for which monitoring is required in Specific Condition 4 of this subsection, the information shall be recorded and stored as an electronic file and shall be available for inspection and printing within at least three days of a request by the Department. [Rule 62-4.070(3), F.A.C.
- 6. Kiln No. 1 and 2 Liquid Fuel (No. 2, 4, 5 and 6 fuel oil) Records: The permittee is already required by previous or current permits to maintain and make available records of sulfur content and heating value (Btu/gal) of each liquid fuel oil shipment based upon analysis of a representative sample of the shipment. The permittee may use records provided by the fuel suppliers to satisfy this existing requirement. If supplier records are used, the applicant shall prepare a purchasing specification that requires the suppliers to provide the same information to the applicant as presently required of the applicant requires (Permits 0530010-003-AC/PSD-FL-233 and 0530010-002+AV; Applicant Request]
- 7. Kiln No. 1 and 2 On-Specification Used Oil Fuel Records: The permittee is already required by previous or current permits to maintain records to insure the on specification used fuel oil burned in Kilns 1 and 2 meets the requirements listed in 40 CFR Part 279, Standards for the Management of Used Oil (PCB reference added). The permittee is already required to keep records of the results of the analysis of representative as-received samples taken from each daily shipment received or collected at the facility. The permittee may use records provided by the fuel suppliers to satisfy this existing requirement for daily shipments received. If supplier records are used, the applicant shall prepare a purchasing specification that requires the suppliers to provide the same information to the applicant as presently required of the applicant.

 [Permits 0530010-003-AC/PSD-FL-233 and 0530010-002-AV; Applicant Request]



SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Emissions and Operating Rates Modifications

This section addresses the following emissions units:

EU ID	Emissions Unit Description
005	Finish Mills 1 and 2 with two dust collectors (Baghouse G-23)
006	Clinker Storage Silos 1 and 2 (Baghouse F-31)
011	Raw Material Storage Silos and Feed System (Baghouse C-11 and C-11A)
016	Clinker Storage Silos 3 (Baghouse L-07)
024	Raw Material Pre-Mix Bin (Baghouse M-2280)
025	Additive Material Storage Bin (Baghouse M-1171)
026	Cement Bag Loadout System (Baghouse M-3514)

ADMINISTRATIVE REQUIREMENTS

1. Relation to Other Permits: The conditions of this permit subsection, supplement all previously issued air construction and operation permits for this emissions unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulatory requirements. The permittee shall continue to comply with the conditions of these permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, testing record keeping, reporting, etc.

[Rule 62-4.070, F.A.C.]

PERFORMANCE REQUIREMENTS

- 2. Finish Mill Nos. 1 and 2 Process Rate Limitation: The maximum transfer rate of theses two finish mills combined shall not exceed 105 tons per hour. [Rule 62-4.070(3), F.A.C.; Applicant request]
- 3. Clinker Storage Silos Nos. 1 and 2 Process Rate Limitation: The maximum clinker loading rate of these two silos shall not exceed 93 tons per hour. [Rule 62-4:070(3); Applicant request]
- 4. Raw Materials Storage and Feed System Process Rate Limitation: The maximum transfer rate from the Raw Materials Silos to the Raw Materials Pre-Mix Bin shall not exceed 330 tons per hour (daily average dry basis). [Rule 62 4:070(3), FAC; Applicant request]
- 5. Clinker Storage Silos No. 3 Process Rate Limitation: The maximum loading rate of this silo shall not exceed 93 tons per hour. [Rules 62-4.070(3) F.A.C.; Applicant request]
- 6. Raw Materials Pre-mix Bin Process Rate Limitation: The maximum loading rate of raw materials to the Raw Materials Pre-Mix Bins and material handling system shall not exceed 330 tons per hour (daily average dry basis). [Rule 62-4.070(3) F.A.C.; Applicant request]
- 7. Additive Material Storage Bin Process Rate Limitation: The maximum loading rate of the Additive Material Storage Bin Shail not exceed 36 tons per hour. [Rule 62-4.070(3) F.A.C.; Applicant request]
- 8. <u>Cement Bag Loadout System Hours of Operation</u>: The operation time for this system shall not exceed 7400 hours per year. [Rule 62-4.070(3) F.A.C.; Applicant request]

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

B. Emissions and Operating Rates Modifications

EMISSIONS AND TESTING REQUIREMENTS

- 9. Particulate Matter (PM/PM₁₀) and Visible Emissions Limits Cement Bag Loadout System:
 - This permit does not establish any new emissions standards or testing requirements except to change the annual emissions limit for Emissions Unit 026, Cement Bag Loadout System, given in existing permits from 1.87 to 2.22 tons per year. The presently applicable visible emissions testing requirements in lieu of stack testing continue to apply. [Permit AC27-185904; Rule 62-297.620(4), F.A.C.; Applicant Request]
- 10. Particulate Matter and Visible Emissions Limits for Finish Mills 1 and 2 (baghouse G-23):

 PM/PM₁₀ emissions for the Finish Mill 1 and 2 (baghouse G-23) shall not exceed 9 lb/hr and 39.4 tons per year (each). Visible emissions shall not exceed 10 % opacity.
- 11. Testing Requirements: The finish mills 1 and 2 (baghouse G-23) shall be stack tested by September 30, 2007 to demonstrate initial compliance with the applicable emission standards for PM/PM₁₀ and visible emissions. Thereafter, compliance with the PM/PM₁₀ limits shall be demonstrated during each federal fiscal year (October 1st to September 30th). After conducting the initial stack test, the applicant may request a revision of the visible emissions standard to 5% opacity and rely on adherence to that standard in lieu of annual stack test demonstrations. [Rules 62-297.3][0(7)(c) and 62-297.620(4), F.A.C.]
- 12. <u>Test Methods</u>: Any required tests shall be performed in accordance with the following reference methods and the applicable requirements of Appendix SC (Standard Conditions) of this permit, and the applicable NESHAP provisions.

Method	Description of Method and Comments
1 - 4	Determination of Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content. Methods shall be performed as necessary to support other methods.
5	Determination of Particulate Matter from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

Additional Reporting and Record Keeping

- 13. <u>Baghouse O&M.Plan</u>: For each baghouse the permittee shall maintain an operation and maintenance (O&M) plan to address proper operation, parametric monitoring, and a schedule for conducting periodic inspections and preventive maintenance. Baghouse inspections and maintenance activities shall be recorded in a written log. The O&M plan shall be submitted to the Compliance Authority prior to any compliance tests for this unit. [Rule 62.4.070(3), and 40 CFR 63.1350, Subpart LLL]
- 14. Test Reports: For each test conducted, the permittee shall file a test report including the information specified in Rule 62-297.310(8), F.A.C. with the compliance authority no later than 45 days after the last run of each test is completed. [Rules 62-297.310(8), F.A.C.]

SECTION 4. APPENDIX GC

GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

- 1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
- 7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida

SECTION 4. APPENDIX GC

GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
- 12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
- 13. This permit also constitutes:
 - a. Determination of Best Available Control Technology ();
 - b. Determination of Prevention of Significant Deterioration ();
 - c. Compliance with National Emission Standards for Hazardous Air Pollutants (); and
 - d. Compliance with New Source Performance Standards ().
- 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
- 15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX SC

STANDARD CONDITIONS

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at this facility.

EMISSIONS AND CONTROLS

- 1. Plant Operation Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
- 2. <u>Circumvention</u>: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
- 3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
- 4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
- 5. Excess Emissions Notification: In case of excess emissions resulting from malfunctions, the permitee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
- 6. <u>VOC or OS Emissions</u>: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
- 7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and62-210.200(203), F.A.C.]
- 8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. [Rule 62-296.320(4)(b)1, F.A.C.]
- 9. <u>Unconfined Particulate Emissions</u>: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

SECTION 4. APPENDIX SC

STANDARD CONDITIONS

- 11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]
- 12. <u>Calculation of Emission Rate</u>: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
- 13. Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.
 - a. Required Sampling Time. Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes. The minimum observation period for a visible emissions compliance test shall be thirty (30) minutes. The observation period shall include the period during which the highest opacity can reasonably be expected to occur.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

[Rule 62-297.310(4), F.A.C.]

14. Determination of Process Variables

- a. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

- 15. <u>Sampling Facilities</u>: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.
- 16. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]
- 17. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:
 - 1) The type, location, and designation of the emissions unit tested.

SECTION 4. APPENDIX SC

STANDARD CONDITIONS

- 2) The facility at which the emissions unit is located.
- 3) The owner or operator of the emissions unit.
- 4) The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- 5) The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- 6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- 7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
- 8) The date, starting time and duration of each sampling run.
- 9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
- 10) The number of points sampled and configuration and location of the sampling plane.
- 11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
- 12) The type, manufacturer and configuration of the sampling equipment used.
- 13) Data related to the required calibration of the test equipment.
- 14) Data on the identification, processing and weights of all filters used.
- 15) Data on the types and amounts of any chemical solutions used.
- 16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
- 17) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.
- 18) All measured and calculated data required to be determined by each applicable test procedure for each run.
- 19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
- 20) The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.
- 21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

- 18. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rules 62-4.160(14) and 62-213.440(1)(b)2, F.A.C.]
- 19. <u>Annual Operating Report</u>: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.

From:

Harvey, Mary

Sent:

Friday, August 03, 2007 10:32 AM

To:

'michaelanthony.gonzales@cemexusa.com'; 'charles.walz@cemexusa.com'; 'amarjits.gill@cemexusa.com'; Nasca, Mara; 'jkoogler@kooglerassociates.com';

'fbergen@kooglerassociates.com'; 'gkuhl@hernandocounty.us'; 'sfernandez@ohfc.com';

'Little James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'

Cc:

Adams, Patty: Heron, Teresa; Gibson, Victoria

Subject:

CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Attachments: CEMEX PROJECT - 0530010-018-AC-DRAFT.zip

Tracking:

Recipient Rea

michaelanthony.gonzales@cemexusa.com

'charles.walz@cemexusa.com'

'amarjits.gill@cemexusa.com'

Masca, Mara

Read: 8/3/2007 10:37 AM

/Koogler@kooglerassociates.com

"Sergen@kooglerassociates.com"

kuhi@hernandocounty.us

'sfernandez@ohfc.com'

Little.James@epamail.epa.gov'

Forney.Kathleen@epamail.epa.gov'

Adams, Patty

Heron, Teresa

Read: 8/6/2007 5:01 PM

Read: 8/3/2007 10:51 AM

Salbson, Victoria

Read: 8/3/2007 10:36 AM

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

From:

Heron, Teresa

To:

Harvey, Mary

Sent:

Friday, August 03, 2007 10:51 AM

Subject:

Read: CEMEX CEMENT, INC. - PROJECT-#0530010-018-AC-DRAFT

Your message

To:

'michaelanthony.gonzales@cemexusa.com'; 'charles.walz@cemexusa.com'; 'amarjits.gill@cemexusa.com'; Nasca, Mara; 'jkoogler@kooglerassociates.com'; 'fkoogler@kooglerassociates.com'; 'gkuhl@hernandocounty.us'; 'sfernandez@ohfc.com'; 'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'

Cc:

Subject:

Adams, Patty; Heron, Teresa; Gibson, Victoria
CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Sent:

8/3/2007 10:32 AM

was read on 8/3/2007 10:51 AM.

From: Sent: Forney.Kathleen@epamail.epa.gov Friday, August 03, 2007 2:26 PM

To:

Harvey, Mary

Cc:

Little.James@epamail.epa.gov

Subject:

Re: FW: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Thanks. We got the files.

katy

Katy R. Forney Air Permits Section EPA - Region 4 61 Forsyth St., SW Atlanta, GA 30024

Phone: 404-562-9130 Fax: 404-562-9019

"Harvey, Mary" <Mary.Harvey@dep .state.fl.us>

08/03/2007 02:25

PM

To Kathleen Forney/R4/USEPA/US@EPA,

James Little/R4/USEPA/US@EPA

CC

Subject FW: CEMEX CEMENT, INC. - PROJECT

#0530010-018-AC-DRAFT

Thanks and have a good weekend.

Mary

From: Harvey, Mary

Sent: Friday, August 03, 2007 10:32 AM

To: 'michaelanthony.gonzales@cemexusa.com'; 'charles.walz@cemexusa.com'; 'amarjits.gill@cemexusa.com'; Nasca, Mara; 'jkoogler@kooglerassociates.com';

'fbergen@kooglerassociates.com'; 'gkuhl@hernandocounty.us'; 'sfernandez@ohfc.com';

'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'

Cc: Adams, Patty; Heron, Teresa; Gibson, Victoria

Subject: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting

From:

"Gibson, Victoria

To:

Harvey, Mary

Sent:

Friday, August 03, 2007 10:36 AM

Subject:

Read: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC:DRAET

Your message

To:

'michaelanthony.gonzales@cemexusa.com'; 'charles.walz@cemexusa.com'; 'amarjits.gill@cemexusa.com'; Nasca, Mara;

'jkoogler@kooglerassociates.com'; 'fbergen@kooglerassociates.com'; 'gkuhl@hernandocounty.us'; 'sfernandez@ohfc.com'; 'Little.James@epamail.epa.gov'
Adams, Patty; Heron, Teresa; Gibson, Victoria

CEMEX CEMEXT, PROJECT #0530010-018-AC-DRAFT

Cc:

Subject:

Sent:

8/3/2007 10:32 AM

was read on 8/3/2007 10:36 AM.

From:

Nasca, Mara

To:

Harvey, Mary

Sent:

Friday, August 03, 2007 10:37 AM

Subject:

Read: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Your message

To:

'michaelanthony.gonzales@cemexusa.com'; 'charles.walz@cemexusa.com'; 'amarjits.gill@cemexusa.com'; Nasca, Mara;

'jkoogler@kooglerassociates.com'; 'fbergen@kooglerassociates.com'; 'gkuhl@hernandocounty.us'; 'sfernandez@ohfc.com'; 'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'

Adams, Patty; Heron, Teresa; Gibson, Victoria

CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Cc:

Subject:

Sent:

8/3/2007 10:32 AM

was read on 8/3/2007 10:37 AM.

From:

Adams, Patty

To:

Harvey, Mary

Sent:

Monday, August 06, 2007 5:01 PM

Subject:

Read: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Your message

To:

'michaelanthony.gonzales@cemexusa.com'; 'charles.walz@cemexusa.com'; 'amarjits.gill@cemexusa.com'; Nasca, Mara; 'jkoogler@kooglerassociates.com'; 'fbergen@kooglerassociates.com'; 'gkuhl@hernandocounty.us'; 'sfernandez@ohfc.com'; 'Little.James@epamail.epa.gov'; 'Forney.Kathleen@epamail.epa.gov'
Adams, Patty; Heron, Teresa; Gibson, Victoria
CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Cc:

Subject:

Sent:

8/3/2007 10:32 AM

was read on 8/6/2007 5:01 PM.

From:

Gary Kuhl [GKuhl@co.hernando.fl.us]

To:

Harvey, Mary

Sent:

Subject:

Tuesday, August 07, 2007 8:40 AM
Read: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Your message

To:

GKuhl@co.hernando.fl.us

Subject:

was read on 8/7/2007 8:40 AM.

From: John Koogler [jkoogler@kooglerassociates.com]

Sent: Friday, August 03, 2007 11:50 AM

To: Harvey, Mary

Subject: RE: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Thank you

John B Koogler Koogler & Associates, Inc 4014 NW 13th St Gainesville, FI 32609 352/377-5822 jkoogler@kooglerassociates.com

From: Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]

Sent: Friday, August 03, 2007 10:32 AM

To: michaelanthony.gonzales@cemexusa.com; charles.walz@cemexusa.com; amarjits.gill@cemexusa.com; Nasca, Mara; jkoogler@kooglerassociates.com; fbergen@kooglerassociates.com; gkuhl@hernandocounty.us; sfernandez@ohfc.com; Little.James@epamail.epa.qov; Forney.Kathleen@epamail.epa.qov

Cc: Adams, Patty; Heron, Teresa; Gibson, Victoria

Subject: CEMEX CEMENT, INC. - PROJECT #0530010-018-AC-DRAFT

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html.

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

From:

Heron, Teresa

Sent:

Thursday, August 02, 2007 2:13 PM

To:

Harvey, Mary

Cc:

Adams, Patty

Subject:

CEMEX Project 018

Follow Up Flag: Follow up

Flag Status:

Red

Attachments:

018APP.pdf; 018COVER.pdf; 018INTENT.pdf; 018NOTICE.pdf; 018TECHNICAL.pdf;

018DPERMIT.pdf

To be mailed out tomorrow August 3.

Thanks, Teresa Heron, Engineer Permitting South Section Bureau of Air Regulation Phone 850/921-9529 teresa.heron@dep.state.fl.us