

Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

March 31, 2006

## CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File 0530010-018-AC, PSD-FL-362  
SNCR, Burners CEMEX Brooksville Plant

The Department received your permit application on October 14<sup>th</sup> and key meteorological and modeling information on October 18. The Department requested additional information on November 14. A response to this request was received on March 3, 2006 from Koogler & Associates for CEMEX.

The original application (0530010-018-AC) is to conduct various projects at the CEMEX Brooksville Plant including use of up to 100% petroleum coke (petcoke) as a fuel in Kilns 1 and 2; use of tire-derived fuel (TDF) in both kilns; installation of new kiln burners; installation of an ammonia injection system in the lower preheater of each kiln; and increase transfer/production rates for various emissions units. The Department has determined that the application is incomplete with respect to the requested projects.

The Department requests submittal of additional information in order to continue processing your application pursuant to Rule 62-4.055, F.A.C., Permit Processing, and the Standards of Issuing or Denying permits at Rule 62-4.070, F.A.C. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

The following information is required to complete the application:

1. In your response to our request for information you described work completed to convert the system from direct to semi-direct firing. However, CEMEX has indicated in an attachment to a subsequent application and during phone conversations with department staff that the system will be converted from semi-direct to indirect firing. Please describe any work that will be conducted with respect to this change, and any expected impacts this change will have on NO<sub>x</sub> and CO. Also submit updates to the appropriate application pages for this change if actually planned. Is this conversion planned for both kilns?
2. The Department requested that you provide continuous emission monitoring system data for both kilns on an hour-by-hour basis including ammonia injection rates, process data, as well as the parameters needed to calculate CO and NO<sub>x</sub> emissions in lb/ton of feed or lb/ton of clinker. The CEMS data provided included only CO and NO<sub>x</sub> concentrations data, ammonia injection rate, and kiln feed rate. Please provide (in electronic format) the parameters needed to calculate CO

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and NO<sub>x</sub> emission rates in lb/ton of feed or lb/ton of clinker for each hour as previously requested.

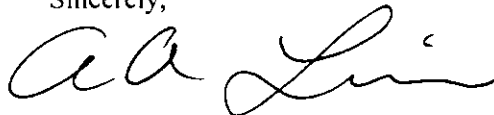
3. According to CEMEX's response to the Department's recent request for information, stack gas NO<sub>x</sub> concentrations were established at compliance NO<sub>x</sub> emission rates for various kiln feed rates. An ammonia injection rate necessary to stay below the predetermined stack gas NO<sub>x</sub> compliance concentration is maintained by the operator. At what kiln feed rates were these NO<sub>x</sub> concentrations established and what are the corresponding NO<sub>x</sub> concentrations?
4. The Department has detected a discrepancy between section 2.1.2 Finish Mills Nos. 1 and 2 (page 4), and Table 3 (page 20) of the Report in Support of the Application for a PSD Construction Permit Review. Page 4 of the report indicates that CEMEX is requesting to split the PM limit for Finish Mills 1 and 2 to 78.9 TPY of PM for each finish mill. In Table 3, the Future Potential for Finish Mills 1 and 2 appear to be listed as 78.8 TPY for both mills. Please clarify and make the necessary adjustments. If Table 3 is incorrect, the *Total Net Change Due to Project* will need to be reassessed for PM.
5. We understand that the Kiln 1 existing tire delivery and injection system was modified. Please provide the historical maximum sustained tire feed rate achieved prior to modification and that achieved since the upgrade of the system.
6. How are the changes in the tire delivery and injection system expected to impact CO emissions given the absence of tertiary air and the bulky nature of the tires?
7. We consider it important to promptly calibrate the CO and NO<sub>x</sub> CEMS to insure the data submitted in support of this application is accurate.
8. Has CEMEX or its affiliates had any violations (or warning letters) related to any Department or EPA regulations at any of their facilities in Florida and the United States? Have officers of CEMEX also been officers of other companies that have had violations (or warning letters) of Department regulations at any facilities? Please provide all documentation in relation to any such violations. This question was included in the Department's first request for additional information. According to Koogler's response dated March 1<sup>st</sup>, this information is to be provided in a separate document. To date, the Department has not received the requested information.

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

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

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

Sincerely,



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

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



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

PS Form 3800, May 2000

See Reverse for Instructions