



KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 • FAX/377-7158

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BUREAU OF AIR REGULATION

Mr. Al Linero
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

**RE: *Permitting Projects 0530010-018-AC and -019-AC; Outstanding Questions
CEMEX Cement, Inc., Brooksville Facility***

Dear Al:

This letter serves as a follow-up to several telephone conversations between you and Koogler and Associates, Inc. (Koogler) staff, regarding the thallium sampling requirements (Project 0530010-018-AC). CEMEX Cement, Inc. (CEMEX) is requesting removal of the daily kiln dust sampling and analysis for Kiln No. 1 and adding the following requirement for Kiln No. 1 (thallium and mercury sampling and analysis) and Kiln No. 2 (mercury sampling and analysis only):

Mercury and Thallium Compliance Demonstration: The permittee shall determine monthly and annual emission rates for mercury (Hg) and monthly concentrations of thallium (Tl) by using the following procedures:

Weekly samples shall be taken of raw material components and coal fed to Kiln Nos. 1 and 2. A monthly composite sample will be made from the weekly samples of raw material components and coal feed. Each monthly composite raw materials components sample shall be analyzed to determine Hg (Kilns 1 and 2) and Tl (Kiln 1 only) concentrations representative for the month and each monthly composite coal sample shall be analyzed to determine Hg concentrations representative for the month. The analytical methods used to determine Hg concentration shall be EPA or ASTM methods such as EPA Method 1631 or 7471A and to determine Tl concentration shall be by current in-house quality control (QC) laboratory x-ray analysis. If the concentrations are below the method detection limits or below the limits of quantification, the method detection limit will be assumed for the concentration of the raw material components or coal.


For mercury only: The monthly Hg input rate (lbs/month) shall be the product of the Hg concentration of the monthly samples and the respective mass of raw material components feed and coal introduced into the pyroprocessing system. The consecutive 12-month Hg throughput rate shall be the sum of the individual monthly records for the current month and the preceding eleven months (pounds of Hg per consecutive 12-months). Such records, including calculations and data, shall be completed no later than 30 days following each month.

Please note that this letter is to supercede a previous email from Fawn Bergen. Hopefully this modification satisfies the remaining issues regarding projects -018-AC, and the Department can

move forward with processing this combined construction permit. If you need any additional information or have any questions, please feel free to contact me or Fawn Bergen at (352) 377-5822 or Charles Walz, CEMEX Cement Inc., at (352) 799-2011, if you have any questions regarding this submittal.

Very truly yours,

KOOGLER & ASSOCIATES, INC.



Max Lee, Ph.D., P.E.
Project Engineer
Florida PE #58091

ML

c: T. Heron, FDEP
J. Gill, CEMEX
C. Walz, CEMEX