



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

KA 521-06-06

MEMO

RECEIVED

JAN 10 2008

BUREAU OF AIR REGULATION

TO: Al Linero, FDEP
FROM: Max Lee *ML*
SUBJECT: Amended Response to Draft AC Permit issued December 17, 2007
DEP File No. 0530010-030-AC
Best Achievable Retrofit Technology (BART)
Cemex Brooksville Cement Plant - North
DATE: January 9, 2008
CC: Charles Walz and Amarjits Gill-Cemex Cement, Inc.

This memo provides a revision and clarification to the comments regarding indirect firing made in my correspondence to you dated January 4, 2008 pertaining to BART for the Cemex Cement, Inc., Brooksville North Cement Plant. The following changes are made to Page 4, last paragraph of my response letter. As stated below, Cemex installed and continues to operate semi-direct firing along with the SNCR system to meet the limits of the relevant permits. We stress that the BART permit address only the relevant limits and technology for BART compliance by the applicable date.

Application of Indirect Firing

On the subject of indirect firing (IF) – In 2005, Cemex installed semi-direct indirect firing systems on Kiln 1 and Kiln 2 (Note that the BART permit addresses only Kiln 1). The semi-direct firing systems, counter to their purpose, increased NOx emissions due to the increased requirement of combustion air needed to calcify the variable composition of raw material in the existing kilns. ~~design using the retrofitted firing system.~~ Subsequently, the IF system was removed and a An SNCR system was subsequently installed to provide assurance that the permitted NOx emission limits could be met on a continuous basis. This information is well documented through FDEP permitting action of Permits No.0530010-026-AC and -034-AC.

While, indirect firing systems could likely reduce NOx emissions, when installed in a different configuration, the complexity such a system required to be retrofitted to this existing kiln is not justified. we argue that indirect firing is not warranted or needed or justified to meet the proposed BART limit. The proposed BART limit can be met with the current SNCR control system as discussed above. Cemex therefore has no plans immediately, or in the foreseeable future, to install indirect firing systems on either kiln.