

August 30, 2007



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Al Linero, FDEP  
Division of Air Resource Management  
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RECEIVED

SEP 05 2007

SUBJECT: Response to RAI Letter dated August 2, 2007  
DEP File No. 0530010-30-AC  
Best Achievable Retrofit Technology

BUREAU OF AIR REGULATION

Dear Mr. Linero,

Enclosed is the response to your second request for additional information (RAI) per your letter dated August 2, 2007 to Michael Gonzales regarding the air construction permit application to incorporate Best Achievable Retrofit Technology (BART) requirements. The responses are provided below as answers in the format of the questions within your letter.

#### MODELING

1. The modeling input shows a run time of 8736 hours rather than a full year. Please explain.

Response: The modeled time frame of 2001-2003 was applied as requested by FDEP. The hours for each year are 2001-8760 hrs, 2002- 8760 hrs, 2003- 8736 hrs. CALPUFF modeling will not function if these hours are not used.

2. Table 7 in the attachment with the letter dated June 28, 2007 details pre-BART modeled emission rates. However, within the modeling input files, the EU or emission unit listed in the table does not correspond with the sources in the modeling. For example, there are 2 emissions units (EUs) for 005 listed in the table but only one was modeled. Please clarify.

Response: Emission unit number 005 is permitting as a single unit because dust collectors #1 and #2 effectively exhaust as a single point. Thus, the emission points were modeled as a single source. The emission rate for this unit is the sum of emissions from both dust collectors provided in Table 11. For example, the total particulate SO4 from each collector is 0.27326 g/s. Thus, the SO4 emission value of 0.5541 g/s was modeled.

Emission unit 5 dual collectors are the only unit which is combined into a single CALPUFF run (file PFCX0401.inp). The other units are modeled separately as stated in each input file, section, 13B.

PFCX0101.inp: emission unit 002  
PFCX0201.inp: emission unit 003  
PFCX0301.inp: emission unit 004  
PFCX0401.inp: emission unit 005  
PFCX0501.inp: emission unit 006  
PFCX0701.inp: emission unit 008  
PFCX0801.inp: emission unit 009  
PFCX0901.inp: emission unit 011(1<sup>st</sup> stack)  
PFCX1001.inp: emission unit 011(2<sup>nd</sup> stack)

3. The modeling includes Pre-BART modeling for nine sources. However, there are only two sources modeled for the Post-BART analysis. Please complete BART modeling.

Response: Post-BART modeling included all sources. However, only two source emissions were changed due to the proposed BART (EU 003 and EU 005). Thus, for Post-BART modeling, only two input files were different from Pre-BART modeling. The subsequent Post-BART modeling processing in POSTUTIL and CALPOST includes all units.

4. Table 18 of the attachment with the letter dated June 28, 2007 show visibility reduction between pre and post-BART. Which pollutant do these results refer to in this table?

Response: Table 18 visibility results are for all subject pollutant emissions. The visibility change from Pre- and Post-BART modeling is due to the reduction of NO<sub>x</sub> of EU 003 from 32.8 to 25.17 g/s and reduction of PM<sub>10</sub> of EU 005 from 3.805 to 1.903 g/s.

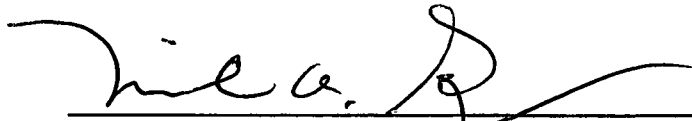
5. Table 18 in the attachment with the letter dated June 28, 2007 shows visibility reductions of 0.5 deciview or slightly greater for all years. However, the conclusion of the analysis does not state any response to these specific results. Please provide a conclusion based on these results.

Response: The stated 36 to 37 percent reduction of visibility (deciview) impact eludes to Table 18 results. The improved visibility, based on the proposed controls, should suffice to comply with BART requirements.

August 30, 2007

If you have any questions regarding this information or any related matter, please contact Max Lee (352) 377-5822.

Sincerely,

  
Micheal Gonzales, Plant Manager

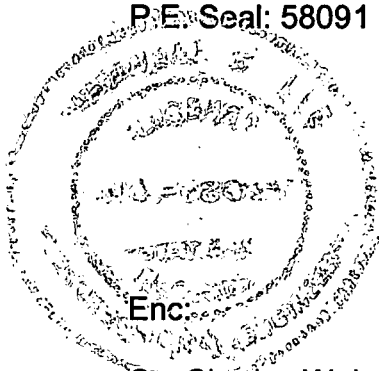
8/30/07  
Date

and

  
Max Lee, Ph.D., P.E.

8/30/07  
Date

P.E. Seal: 58091



Enc:  
Cc: Charles Walz, Cemex