

Florida Department of Environmental Protection

Bob Martinez Center 2600 Blair Stone Road Tallahassee, Florida 32399-2400 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

August 2, 2007

Electronically sent – Received Receipt requested.

michaelanthony.gonzales@cemexusa.com

Mr. Michael Gonzales, Plant Manager CEMEX Cement, Inc. 16301 Ponce De Leon Boulevard Brooksville, Florida 34614-0849

Re: Second Request for Additional Information
DEP File No. 0530010-030-AC
Best Available Retrofit Technology (BART) for Kiln No. 1

Dear Mr. Gonzales:

On July 3, 2007 we received additional information regarding your application for an air construction permit to incorporate Best Achievable Retrofit Technology (BART) requirements for Kiln No. 1 at the existing Brooksville cement plant in Hernando County.

Pursuant to Rules 62.296.340 (2), 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. 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.

MODELING

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

Mr. Michael Gonzales August 2, 2007 Page 2 of 2

When we receive this information, we will continue processing your application. We are available to discuss the details of our request for additional 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.

The processing of this application is under time constraints. The Division of Air Resource Management has a goal to finalize all BART determinations by October 1, 2007. The Department must submit a state implementation plan (SIP) to EPA by December 17, 2007, identifying all BART determinations. Because of the timing of the rule and submittal of the applications, you are being granted a limited time to submit the requested information. Please provide the additional information by August 31, 2007.

If there are any questions, please call Teresa Heron at 850/921-9529. Matters regarding modeling issues should be directed to Debbie Nelson at 850/921-9537.

Sincerely,

A.A. Linero, Program Administrator

Bureau of Air Regulation

Permitting South

AAL/th

cc: Charlie Waltz, CEMEX: charles.walz@cemexusa.com

Katy Forney, EPA: <u>forney.kathleen@epa.gov</u> Stanley Krivo, EPA: <u>krivo.Stanley@epa.gov</u> Dee Morse, NPS: <u>dee morse@nps.gov</u>

Meredith Bond, FWS: meredith bond@fws.gov Jim Kraus, FWS: chassahowitzka@fws.gov

Maxwell Lee, P.E., Koogler & Associates: <u>mlee@kooglerassociates.com</u> John Koogler, P.E., Koogler & Associates: <u>jkoogler@kooglerassociates.com</u>