



# Department of Environmental Protection

Jeb Bush  
Governor

Southwest District  
3804 Coconut Palm Drive  
Tampa, Florida 33619

Colleen M. Castille  
Secretary

**CERTIFIED MAIL**

**RECEIVED** May 17, 2005

MAY 19 2005

Mr. Michael Gonzales  
CEMEX Cement, Inc.  
P.O. Box 6  
Brooksville, FL 34605

BUREAU OF AIR REGULATION

Re: Request for Additional Information  
Title V Renewal Application (DEP Project 0530010-015-AV)  
CEMEX Brooksville Cement Manufacturing Plant

Dear Mr. Gonzales:

The Department received your application for the renewal of the Title V Air Operation Permit for the CEMEX Brooksville Cement Manufacturing Plant on March 18, 2005. Based on our review of the proposed project, we have determined that the application is incomplete. Therefore, the following information is needed in order to continue processing this application pursuant to Rules 62-213.420(1)(b) and 62-4.070(1), F.A.C.

1. Compliance Assurance Monitoring (CAM) - In the EMISSIONS UNIT INFORMATION section of the permit application for each of the emission units equipped with a baghouse particulate matter (PM) control device (i.e., all of the EU's except EU 028), Section I, Item 2 (Compliance Assurance Monitoring) under Additional Requirements for Title V Air Operation Permit Applications, is marked as 'Not Applicable'. As each of these emission units also has an applicable emission unit PM standard, CAM is potentially applicable to the baghouse unless some other criteria exempts it from CAM requirements. For each of the emission units equipped with a baghouse, please explain with details why you feel CAM is not applicable. One basis for exemption could be that potential PM emissions from this emission unit without controls are less than 100 TPY (provide calculations). Another could be that the baghouse is inherent to the operation rather than strictly an air pollution control device. If you wish to make this case you must answer the following three questions for each of the emission unit baghouses to which you feel it applies:

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"More Protection, Less Process"

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- a. Is the primary purpose of the equipment other than to control emissions relative to the applicable emissions limit ?
- b. Would the equipment be installed if there were no applicable emissions limit in place for the pollutant specific emissions unit ?
- c. Is the efficiency at which the equipment is operated by design for purposes other than compliance with the applicable emissions limit more than sufficient to assure compliance with the applicable emissions limit (e.g., a significant margin of compliance) ?

If the answer to all three questions is "yes," then the equipment qualifies as inherent process equipment for Part 64 purposes., and is, therefore, exempt from the CAM requirements for that particular pollutant.

2. Requested Changes to Title V Permit That Will Require a Construction Modification Permit - Attachment H to the application, along with the EMISSION UNIT INFORMATION sections of the application, request changes to the current Title V permit (including changes to permitted operating hours, maximum process rates, and emission limits) that were established in construction permits and therefore cannot be changed except by another construction permit. These changes are summarized on an enclosed document titled "CEMEX Title V Permit Renewal Application Requested Changes That Will Require Construction Modification Permit". In order to the Department to review and make these permit revisions, it will be necessary that you formally request a construction modification permit and state which of these changes you are requesting be made. Please note that the Item 1 requested changes to the unconfined PM control measures will require that CEMEX show how the proposed measures will provide the same level of control as the current more stringent specific measures. Some of the items are followed with a notation **PSD ?**. For these items to be modified the request must also include an analysis of the applicability of PSD to these modifications (individually and as a group) considering that they are relaxations of the current requirements with the resulting potential for increase in actual emissions.

If you are requesting that some of the current permit requirements be modified in a construction permit, and wish these modifications to be included in the Title V permit renewal, then this construction permit will need to be issued final prior to the Draft Title V permit issuance (with the Title V permit application held incomplete) or processed at the same time as the Draft Title V permit issuance

(i.e., on a common Intent to Issue and public notice). Please indicate your choice as to how this is handled.

(Note: Also enclosed for your use is a table that summarizes emission unit process rates and averaging times that was made to aid in review of the application (see Table PR-1, titled "Current Process rate Limitation Summary Table").

(Note: Both of the enclosed documents are available as electronic files if requested.)

3. Compliance Plan Required – Our records currently show that Kiln No. 1 is not in compliance with the NESHAP Subpart LLL 40 CFR 63.1343(b)(1)(3) doxin/furan (D/F) emission standard when operating with the raw mill out of service. In accordance with the requirements of Rule 62-213.440(2), F.A.C., please submit a compliance a *Compliance Plan* that meets the requirements of the above rule. The Compliance plan shall also include any items agreed to in discussions with the Department, including but not limited to deadlines for notification of re-starting Kiln 1, notification of testing on Kiln 1, testing to be conducted within 15 days of re-starting Kiln 1, and commitment to shutdown of Kiln 1 should those tests fail to show compliance.
4. Process Rate Basis – As evidenced by your request to revise Specific Condition No. N1. to specify that the process rate limitation is on a dry material basis, there is some confusion as to the basis for the process rate limits in the permit. Please state what basis (as measured or dry basis) you feel applies for each of the emission unit process rates, and also describe how these rates are actually determined for purposes of the required recordkeeping documenting compliance with the process rate limitations. Specifically state which rates, if any, are converted from their "as measured" basis to another basis (e.g. from as measured basis to a dry basis) as part of the recordkeeping process and how this is done (give an example conversion).

Responsible Official (R.O.) Certification Statement: Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response (including the Compliance Plan) should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the DEP Form 62-210.900(1).

Professional Engineer (P.E.) Certification Statement: 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 response to Department requests for additional information of an engineering nature. Please complete and submit a new P.E. certification statement page from DEP Form 62-210.900(1), to cover the additional information submitted (including the Compliance Plan)..

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)6, F.A.C. If you have any questions, please call me at (813) 744-6100, extension 118.

Sincerely,



David Zell  
Air Permitting Engineer  
Southwest District

DRZ/

enclosures (2)

copies to:

- William Proses, P.E., Koogler and Associates
- ✓ - Greg DeAngelo, FDEP, DARM, Bureau of Air Regulation,

CEMEX Title V Permit Renewal Application Requested Changes That Will Require a Construction Modification Permit (because current requirements were established in an AC)

1. Cond. 6.b. - Revise Unconfined PM reasonable control measures to delete some specific requirements (and add new more general requirements). **CEMEX needs to show how new proposed measures will provide same level of control as current more stringent specific requirements.**
2. Cond. B.1. (+ Subsection B description) – Change 30-day rolling average Kiln No. 1 feed rate limitation to a tons/year (*per any 12-consecutive month period*) limit. **PSD ?**
3. Cond. B.20. – delete condition limiting thallium concentration in baghouse dust.
4. Cond. B.21.b. – Change liquid fuel records for %S and heat content from being based on analysis of a sample to supplier's records.
5. Cond. C.6. – Change requirement for PM testing to 5% VE limit in lieu of testing (add new condition).
6. Cond. D.1. (+ Subsection D description) – Change clinker silo loading rate from 90 to 93 TPH. **PSD ?**
7. Cond. F.2. – Correct PM lb/hr limit from 36.05 (which does not match the 25.0 TPY limit) to 5.7 lb/hr (which corresponds to 25.0 TPY @ 8760 hrs/yr).
8. Cond. G.1. – Change raw material transfer rate from 290 TPH to 330 TPH (dry basis) (CEMEX did not specifically request change of this rate (only requested that condition specify that the limit was on a dry basis) because application incorrectly showed that it already was 330 TPH, which it is not). (see also N.1.) **PSD ?**
9. Cond. J.1. (+ Subsection J description) – Change 30-day rolling average Kiln No. 2 feed rate limitation to a tons/year (*12-consecutive rolling months*) limit. **PSD ?**
10. Cond. K.1. (+ Subsection K description) – Change clinker silo loading rate from 90 to 93 TPH. **PSD ?**
11. Cond. K.11. – Change maximum throughput rate from 90 to 93 TPH in Operating Rate During Testing condition (*see 10 above*).
12. Cond. N.1. change basis of raw material transfer rate to "dry basis". **PSD ?**  
(Also should be noted that construction permit 0530010-005-AC modifies this condition to read (*emphasis added*):
  2. The rate of transfer of raw material to the Raw Material Pre-Mix Bins and material handling system shall not exceed ~~330~~ ~~290~~ **tons per hour (one-hour maximum) nor 300 tons per hour (rolling 30-calendar day average)**. [Construction permit modification application dated July 24, 2000 Permit No. AC27-185905]  
*This was incorrectly incorporated in Title V revision permit 0530010-006-AV.)*

13. Cond. O.1. (+ Subsection O description) – Change material transfer rate for the Additive Material Storage Bin from 30 to 36 TPH. **PSD ?**

14. Cond. P2. – Change permitted hours/year from 6,240 to 7,400 hours/year (*per any 12-consecutive month period*). **PSD ?**

Currently not shown as being previously limited by an AC, but change needs to be made on a construction permit:

15. Cond. C.1. – increase transfer rate for Finish Mill Nos. 1 & 2 from 98 to 105 TPH.

16. Cond. C.2. – change PM limit from a combined 36 lb/hr to 18 lb/hr for ea Finish Mill.

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**PSD ?** = May result in increase in actual emissions. Potential PSD impact of this change needs to be addressed by CEMEX.

**Current Process Rate Limitation Summary Table**

Affected EU No.	Rate From - To Description	Rate	Avg Time	?	Rev Req	Dry Basis Conv. Done	Ref. Cond.	Limit In AC
011	From Raw Mill Storage Silo to Pre-Mix Bin	290 TPH	Daily Average	?	yes?	Yes ?	G.1.	Yes
024	To Pre-Mix Bins (2) and material handling system	330 TPH	Maximum hourly			Yes ?	N.1.	Yes
	"	300 TPH	30-day rolling avg.	?		Yes ?	004-AC	Yes
008	Raw Mills 1 & 2 to No.1 & 2 Blending Silos	160 TPH	Daily Average			Yes ?	E.1.	Yes
002	Kiln No. 1 Feed Silos to Kiln No. 1 Feed Surge Bin	165 TPH	Maximum hourly			No	A.1.	Yes
	"	150 TPH	30-day rolling avg.		?	No	A.1.	Yes
003, 004	Kiln No. 1 Preheater to Kiln No. 1	165 TPH	Maximum hourly			No	B.1.	Yes/PSD
	"	150 TPH	30-day rolling avg.		Yes	No	B.1.	Yes/PSD
006	Clinker Cooler No. 1 to Clinker Silo Nos.1 & 2 (comb.)	90 TPH	Daily Average		Yes	No	D.1.	Yes
025	To Additive Storage Bin, From A.S Bin to Finish Mills 1&2	30 TPH	Daily Average		Yes	No	O.1.	Yes
005	Clinker/Gypsum Silos(+) to Finish Mill Nos. 1 & 2 (comb.)	98 TPH	Daily Average		Yes	No	C.1.	No ?
022	Finish Mill No. 1 to Masonary Silo	71 TPH	Daily Average			No	M.1.	Yes
009	Finish Mil Nos. 1,2 & 3 to Cement Silos 1-5 (comb.)	210 TPH	Daily Average			No	F.1.	Yes
012	Raw Mill No. 2 to Kiln No. 2 Blending Silo	165 TPH	Daily Average	?		Yes ?	H.1.	Yes
013	Kiln No. 2 Feed Silo to Kiln No. 2 Feed Surge Bin	165 TPH	Maximum hourly	?		No	I.1.	Yes
	"	150 TPH	30-day rolling avg.		?	No	I.1.	Yes
014	Kiln No. 2 Preheater to Kiln No. 2	165 TPH	Maximum hourly	?		No	J.1.	Yes/PSD
	"	150 TPH	30-day rolling avg.		Yes	No	J.1.	Yes/PSD
016	Clinker Cooler No. 2 to Clinker Silo No. 3	90 TPH	Maximum hourly		Yes	No	K.1.	Yes
017, 018	Clinker Silo No. 3 + Gypsum Silo to Finish Mill No. 3	112 TPH	30-day rolling avg.			No	K.1.	Yes
	" (max clinker rate)	150 TPH	Maximum hourly			No	K.1.	Yes
	" (max gypsum rate)	60 TPH	Maximum hourly			No	K.1.	Yes
019	Finish Mil No. 3 Process rate (output)	112 TPH	Daily Average			No	L.1.	Yes
021	Finish Mill Nos. 3 (&1) to Cement Silos 7 & 8 (comb.)	155 TPH	Daily Average			No	M.1.	Yes
023	Cement Silo Nos. 7&8 to Side No. 2 Truck Loadout Bins	350 TPH	Daily Average			No	M.1.	Yes
023	Side No. No. 2 Truck Loading Spouts Truck Loading Rate	286 TPH	Daily Average			No	M.1.	Yes
026	Cement Bag Loadout System No. 1 Process Rate	47 TPH	Daily Average			No	P.1.	Yes
027	Cement Bag Loadout System No. 2 Process Rate	47 TPH	Daily Average			No	Q.1.	Yes

? = possible conflict in rates or averaging time

Rev Req = Revision to process rate or averaging time requested in TV renewal appl.