



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
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Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

March 30, 2006

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

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

RECEIVED

APR 01 2006

Dear Mr. Gonzales:

BUREAU OF AIR QUALITY

Re: 2nd Request for Additional Information (RAI)
Air Construction Permit Application for Clay Shredder System
and Concurrent Title V Air Operation Permit Revision
(DEP Project Nos.: ~~1050010-020-AC~~ and ~~1050010-021-AV~~)

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On March 2, 2006, the Department received the February 28, 2006 response letter from your consultant, Koogler & Associates, to the Department's request for additional information (RAI) on the construction permit application for a clay shredder and associated fly ash storage and handling equipment at your cement manufacturing facility located in Brooksville, Hernando County. In order to continue processing the application, the Department will need the following additional information pursuant to Rule 62-4.055(1), F.A.C. (Note: Item numbers below refer to the Items on the original Request for Additional Information and your response letter.)

5. Current Use and Handling of Clay - In the response it was stated that clay is not currently being used as a raw material in the kiln mix. This raises the following questions:
 - a. Has clay been used in the kiln mix in the past?
 - b. If clay has been used in the past:
 - i. When was it used (specific time periods), what was the kiln mix makeup (raw materials and percentages of each in mix), and what was the source of the clay?
 - ii. How does the analysis of the clay used in the past compare to that for the clay to be used from the CEMEX quarry as a result of installing the clay shredder system?
 - iii. Has compliance testing for compliance with permit limitations and/or MACT D/F limitation been conducted while using any kiln mix containing clay? If so when was the testing done, what was the kiln mix makeup, and what was the source of the clay?

6. Potential PM/PM10 Emission Calculations (Table 1 in Appendix A to the application)

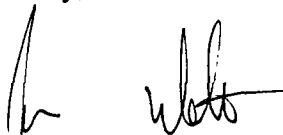
In the Description of the Proposed Construction it is stated that while shredding the clay flyash is added to coat the clay and reduce the moisture content of the resulting mix. In the response letter it was stated that the moisture content of the clay/flyash mix is estimated to be 9%. For purposes of adjusting the PM/PM10 emission factors (Ef) for estimating PM emissions from the shredder (Clay Processing) and the post-shredder material transfer points (Fugitive Sources), 9% would appear to be the appropriate moisture content to be used to compare with the moisture content the emission factors are based on rather than the 15% moisture content that was used. Please provide justification for the use of the 15% moisture content, or revise Table 1 (Potential PM/PM10 Emissions from Clay Shredder System) to reflect use of a revised (higher) Ef adjustment factor.

Rule 62-4.050 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. As a result, your response to the above requests should be certified by a professional engineer just as the original application was.

"Notice: Pursuant to the provisions of Section 120.600, F.S. and Subsection 62-12.070(5), F.A.C., if the Department does not receive a response to this request for information within 90 days of the date of this letter, the Department will issue a final order denying your application. If the response will require longer than 90 days to develop, an application for new construction should be withdrawn and resubmitted when completed information is available. "

If you have any questions on this request, please contact David Zell of my staff at (813) 632-7600 extension 118 or via email at david.zell@dep.state.fl.us.

Sincerely,



Jason Waters, P.E.
Air Program Permitting Supervisor
Southwest District Office

JWW/DRZ

copies to:

- Neil A. Lofgren, P.E., Koogler & Associates
- Al Lino, FDEP, DARM, Bureau of Air Regulation