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December 7, 2005

D.E.P
SOUTHWEST DISTRICT
DEC 09 2005
TAMPA

Mr. Joel A. Smolen
Florida Department of
Environmental Protection Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619-8318

**Subject: 2nd Request for Additional Information
Title V Renewal Application (DEP Project 0530010-015-AV)
Construction Modification Application (DEP Project 0530010-017-AC)
CEMEX Brooksville Cement Manufacturing Plant**

Dear Mr. Smolen:

In response to your letter dated September 14, 2005 and received September 16, 2005 the attached responses are provided:

1. PSD Applicability of Requested Changes to Title V Permit that will Require a Construction Modification Permit (DEP Project 0530010-017-AC)

CEMEX withdraws all requested for changes to the current Title V Air Operation Permit except for the changes to:

- Section II. 6.b. Provide consistent precautions to prevent unconfined PM
- Section II. 7. Remove shutdown requirement
- Section II. 13. Include manufacturer's specifications if greater than 10%
- Condition B.20 Remove thallium sampling ✓
- Condition B.21.b. Allow use of fuel supplier's records ✓

No process rate changes are requested. All process rate changes will be addressed in a separate air construction permit application.

2. Process Rate Changes

No process rate changes are requested.

3. Emergency Generator

United States Operations

P.O. Box 6, Brooksville, Florida. 34605-0006. USA. Phone: (352) 796-7241, Fax: (352) 754-9836

There was not an emergency generator at the time of application and issuance of the current Title V Permit. There may have been a rented emergency generator on site prior to the time of application and issuance of the current Title V Permit. Presently there are two rented emergency generators used to cool burner pipes. A revised Attachment D is enclosed with the rented emergency electrical generators included, Enclosure 1.

4. Permitted fuels for Kilns

- a. Natural Gas - Kilns 1 and 2 have not and currently do not burn natural gas. We would like to have the ability to burn natural gas if market conditions make it economical and it was available. Kilns 1 and 2 would be capable of burning natural gas if the infrastructure required to deliver the gas was available. The gas would be used for startup.
- b. Flolite - Flolite has not been used as a fuel for over ten years. CEMEX would like to have the ability to burn flolite if market conditions make it economical and it was available.

5. Facility Construction Projects

Enclosure 2 lists all construction projects that have occurred at the Brooksville facility in the last 24 months.

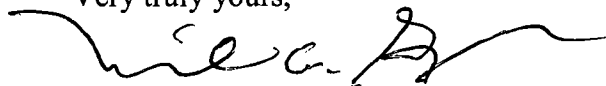
6. Compliance Report and Plan

Enclosure 3 is a Compliance Report and Plan.

Enclosure 4 is a new R.O. certification statement page from the DEP Form 62-210.900(1).

Enclosure 5 is a new P.E. certification statement page from the DEP Form 62-210.900(1).

Very truly yours,



Michael A. Gonzales
CEMEX Cement, Inc.

Enclosure 1

Attachment D - List of Insignificant Activities

The facilities, emissions units, or pollutant-emitting activities listed in Rule 62-210.300(3)(a), F.A.C., Categorical Exemptions, are exempt from the permitting requirements of Chapters 62-210 and 62-4, F.A.C.; provided, however, that exempt emissions units shall be subject to any applicable emission limiting standards and the emissions from exempt emissions units or activities shall be considered in determining the potential emissions of the facility containing such emissions units. Emissions units and pollutant-emitting activities exempt from permitting under Rule 62-210.300(3)(a), F.A.C., shall not be exempt from the permitting requirements of Chapter 62-213, F.A.C., if they are contained within a Title V source; however, such emissions units and activities shall be considered insignificant for Title V purposes provided they also meet the criteria of Rule 62-213.430(6)(b), F.A.C. No emissions unit shall be entitled to an exemption from permitting under Rule 62.210.300(3)(a), F.A.C., if its emissions, in combination with the emissions of other units and activities at the facility, would cause the facility to emit or have the potential to emit any pollutant in such amount as to make the facility a Title V source.

The below listed emissions units and/or activities are considered insignificant pursuant to Rule 62-213.430(6), F.A.C.

Brief Description of Emissions Units and/or Activities

1. No. 2 fuel oil tank, 25,000 gal
2. Diesel fuel tank, 30,000 gal
3. Gasoline tank, 2500 gal
4. Grinding aid tank
5. Tank for aqueous ammonia, 6,000 gal
6. Emergency generators (2)

	1	2
Make	Multi Quip	Multi Quip
Model	DCA	DCA
Rating	56 KW	56 KW
Heat input	0.19 mmBTU/hr	0.19 mmBTU/hr
Fuel	Diesel	Diesel
Purpose	Cooling burner pipes	Cooling burner pipes
Max Utilization	500 hours	500 hours
Typical Utilization	150 hours	150 hours
NOX (500 hours)	0.21 tons	0.21 tons
NOX (150 hours)	0.06 tons	0.06 tons
NOX (8,760 hours)	3.7 tons	3.7 tons

Enclosure 2

Facility Construction Projects - October 1, 2003 - September 30, 2005

Date	Description/Purpose	Effect on Operations/Production
4/2005	Cooling air dampers #1Raw Mill by pass ducting	Passed Kiln #1 DF compliance testing Raw Mill down mode June 2005
4/2005	Installed Low NOx burner pipes both kiln	Lower NOx emissions
8/2005	SNCR Ammonia Injection system. Includes tank, pumps pipelines and Injector nozzles	Lower NOx emissions
7/2005	Automated Waste Tire feed system for #1 kiln	Improved handling and operation of Kiln #1 tire system.
10/2005	Outside Clinker Reclaim Hopper for Finish Mill #1	Ability to reclaim outside clinker

Enclosure 3

Compliance Report and Plan

All air emission units at the CEMEX Brooksville facility is presently in compliance with all state and federal rules and regulations.

Compliance tests conducted September 26 - 29, 2005, and submitted November 3, 2005, confirm compliance with all emission limitations. Testing with and without SNCR was conducted on both Kilns. Kiln #2 passed with and without SNCR. Kiln #1 failed without SNCR but passed using SNCR to control NOx .

Dioxin furan Compliance Testing with the raw mills operating on both kilns was completed in August 2003. The kiln feed mix was the historical flyash mix.

Dioxin furan Compliance Testing with the raw mills not operating on both kilns was completed in July / August 2004. The kiln feed mix was with Bauxite / fly ash

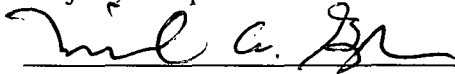
Dioxin furan Compliance Testing with the raw mills not operating on both kilns was completed in March 2005 on Kiln #2 and in June 2005 on kiln #1. The kiln feed mix was the historical fly ash mix.

Enclosure 4

R.O. Certification Statement

Application Responsible Official Certification

Complete if applying for an initial/revised/renewal Title V permit or concurrent processing of an air construction permit and a revised/renewal Title V permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1. Application Responsible Official Name: Michael A. Gonzales
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input checked="" type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source.
3. Application Responsible Official Mailing Address... Organization/Firm: CEMEX Street Address: City: Post Office Box 6 State: Florida Zip Code: 34605
4. Application Responsible Official Telephone Numbers... Telephone: (352) 799 - 2057 ext. Fax: (352) 754 - 9836
5. Application Responsible Official Email Address: mike.gonzales@cemexusa.com
6. Application Responsible Official Certification: I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.  Signature <u>12/7/2005</u> Date

Enclosure 5

P.E. Certification Statement

Professional Engineer Certification

1. Professional Engineer Name: William A. Proses Registration Number: 52080
2. Professional Engineer Mailing Address... Organization/Firm: Koogler & Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 317 - 1030 ext. Fax: (813) 920 - 9539
4. Professional Engineer Email Address: wproses@kooglerassociates.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input type="checkbox"/> , if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/> , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input checked="" type="checkbox"/> , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input type="checkbox"/> , if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature: <u>William A. Proses</u> Date: <u>12/7/05</u> (seal)

* Attach any exception to certification statement.

