



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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KA 521-05-01
April 7, 2006

Dept. of Environmental
Protection

APR 10 2006

Southwest District

Mr. David Zell
Florida Department of Environmental Protection
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RE: 3rd Request for Additional Information (RAI) dated January 5, 2006
Title V Renewal Application (DEP Project 0530010-015-AV)
CEMEX Brooksville Cement Manufacturing Plant

Dear Mr. Zell:

CEMEX Cement, Inc. (CEMEX) is in receipt of the Department's third request for additional information dated January 5, 2006, regarding the Title V Renewal Application (DEP Project 0530010-015-AV).

CEMEX has applied for two (2) after-the-fact air construction permits (Projects 0530010-019-AC and -018-AC) for the Kiln 1 Cooling Dampers and the installation of low-NOx burners and SNCR on Kilns 1 and 2, respectively. Since neither of these construction permitting projects have been deemed complete by the Department, and therefore construction permits have not been issued, these projects have not been incorporated into the Title V operation permit yet. Once these construction permits have been issued and any required compliance testing is completed, CEMEX will apply for a Title V operation permit revision to incorporate the construction projects.

At the Department's request, a Compliance Plan has been completed to address these outstanding construction permitting projects. The Compliance Plan is described below.

DEP Project 0530010-018-AC/Low-NOx Burners and SNCR System for Kilns 1 and 2

<u>Date</u>	<u>Milestone</u>
3/1/06	Request for Additional Information (RAI) submitted to FDEP.
9/1/06	Second RAI expected from FDEP; CEMEX expects to respond to RAI No. 2 by this date (depends on the date FDEP issues RAI No. 2).

3/1/07 CEMEX expects that FDEP will have issued DRAFT AC permit; CEMEX will review and comment; CEMEX expects that FDEP will issue FINAL AC permit by this time.

9/1/07 CEMEX expects to submit a Title V revision application to incorporate the requested changes in AC permit (except for the request for burn petcoke and tires in the kilns).

DEP Project 0530010-019-AC/Kiln 1 Cooling Dampers

<u>Date</u>	<u>Milestone</u>
3/1/06	Response to FDEP's RAI was submitted on 1/13/06. A second RAI was received 2/13/06.
9/1/06	CEMEX will respond to the second RAI by 5/14/06 (90 days after receipt). CEMEX expects that FDEP will have issued DRAFT AC permit; CEMEX will review and comment.
3/1/07	CEMEX expects that FDEP will issue FINAL AC permit by this time.
9/1/07	CEMEX expects to submit a Title V revision application to incorporate the requested changes in AC permit.

As required in Rule 62-213.440, F.A.C., CEMEX will notify the Department within 15 days after the completion of each milestone (on a semi-annual basis) until compliance is achieved. The notification will be signed by the responsible official.

If you have any questions, feel free to contact me at (352) 377-5822 or FBergen@kooglerassociates.com, or Mr. Charles Walz, CEMEX, at (352) 799-2011.

Regards,

KOOGLER & ASSOCIATES, INC.



Fawn W. Bergen, P.E.
Project Engineer

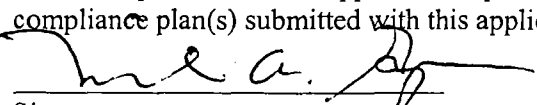
FB

cc: J. Bins, CEMEX
J. Gill, CEMEX
C. Walz, CEMEX



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, Plant Manager
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 Cement, Inc. Street Address: PO Box 6 City: Brooksville State: FL Zip Code: 34605
4. Application Responsible Official Telephone Numbers... Telephone: (352) 799-2057 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 4/6/2006 Date

APPLICATION INFORMATION

Professional Engineer Certification

1. Professional Engineer Name: Fawn Bergen, P.E. Registration Number: 61614
2. Professional Engineer Mailing Address... Organization/Firm: Koogler & Associates, Inc. Street Address: 4014 N.W. 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377-5822 ext. Fax: (352) 377-7158
4. Professional Engineer Email Address: fbergen@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 checked="" 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 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><i>Fawn Bergen</i></u> Date <u>4/7/06</u> (seal)

* Attach any exception to certification statement.