



June 1, 2010

Dept. Of Environmental Protection

JUN 04 2010

Southwest District

Mrs. Cindy Zhang-Torres  
Southwest District Office  
Florida Department of Environmental Protection  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

**RE: CEMEX Construction Materials Florida, LLC; Brooksville South Cement Plant  
Title V Permit Revision Application for Incorporation of Permits 0530021-022/026-AC  
Water Injection System; Kiln No. 1**

Dear Mrs. Zhang-Torres:

Enclosed please find four (4) signed originals of the Responsible Official (RO) signature page for the application to incorporate air construction permits 0530021-022-AC and 0530021-026-AC (revises 0530021-022-AC) into the facility Title V permit as required by permit 0530021-022-AC, Item 8. These signature pages are submitted for the application sent by Max Lee with Koogler and Associates, Inc. Please incorporate the signature pages into the application from Max Lee.

If you should have any questions regarding this application, please do not hesitate to contact Max Lee at (352) 377-5822 or [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com), or me at (352) 799-7881 or [gtownsend@cemexusa.com](mailto:gtownsend@cemexusa.com).

Respectfully,

George Townsend  
CEMEX Construction Materials Florida, Inc.

Enclosure: Application Form signature pages – 4 copies

pc: James S. Daniel, Plant Manager (all via email)  
Lillian F. DePrimo, Director, Environmental  
M. Lee, Koogler & Associates, Inc.

D:\Documents and Settings\gtownsend\My Documents\Brooksville South\Kiln 1\Water Injection AC Permit Application\307-10-06  
DEP-WaterInjectionLetter-FINAL.doc

**Florida Region**

10311 Cement Plant Rd., Brooksville, Florida 34601. USA, (352) 799-7881, Fax: (352) 799-6088



KOUGLER & ASSOCIATES, INC.  
ENVIRONMENTAL SERVICES  
4014 NW 13th STREET  
GAINESVILLE, FL 32609-1923  
352/377-5822 ▪ FAX/377-7158

Dept. Of Environmental Protection

JUN 03 2010

June 2, 2010  
307-10-06

Southwest District

Mrs. Cindy Zhang-Torres  
Southwest District Office  
Florida Department of Environmental Protection  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

**RE: CEMEX Construction Materials Florida, LLC; Brooksville South Cement Plant  
Title V Permit Revision Application for Incorporation of Permits 0530021-022/026-AC  
Water Injection System; Kiln No. 1**

Dear Mrs. Zhang-Torres:

Enclosed please find four (4) copies of the application for the Title V permit revision to incorporate air construction permits 0530021-022-AC and 0530021-026-AC (revises 0530021-022-AC) into the facility Title V permit. The application is required by permit 0530021-022-AC, Item 8. Permit 0530021-026-AC is expected to be authorized shortly. If possible, we request that this permit be incorporated in this Title V revision. Please note that the RO signature pages are to arrive in a separate package to your attention.

As we discussed, Specific Conditions A.10 and A.11 were expected to be the intended requested information of Item 8 of permit 0530021-022-AC. As such, we have provided the information as Attachment B of the application.

If you should have any questions regarding this application, please do not hesitate to contact me at (352) 377-5822 or [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com), or George Townsend at (352) 799-7881 or [GTownsend@cemexusa.com](mailto:GTownsend@cemexusa.com).

Regards,

Max Lee, Ph.D., P.E.  
Koogler & Associates, Inc.

Enclosure: Application

copy to: J. Daniel, CEMEX (via email)  
L DePrimo, CEMEX (via email)  
G. Townsend, CEMEX

**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

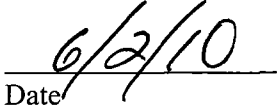
**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name: <b>Mr. James S. Daniel, Plant Manager</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>CEMEX Construction Materials Florida, LLC</b> Street Address: <b>10311 Cement Plant Road</b> City: <b>Brooksville</b> State: <b>Florida</b> Zip Code: <b>34601</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(352) 799-7881</b> ext. Fax: <b>(352) 540-4794</b>
4. Owner/Authorized Representative E-mail Address: <b>jdaniel@cemexusa.com</b>
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>   Signature   Date

**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name: <b>Mr. James S. Daniel, Plant Manager</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>CEMEX Construction Materials Florida, LLC</b> Street Address: <b>10311 Cement Plant Road</b> City: <b>Brooksville</b> State: <b>Florida</b> Zip Code: <b>34601</b>
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4. Owner/Authorized Representative E-mail Address: <b>jdaniel@cemexusa.com</b>
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>   Signature   Date

**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

**Complete if applying for an air construction permit or an initial FESOP.**

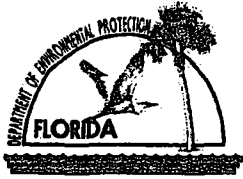
1. Owner/Authorized Representative Name: <b>Mr. James S. Daniel, Plant Manager</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>CEMEX Construction Materials Florida, LLC</b> Street Address: <b>10311 Cement Plant Road</b> City: <b>Brooksville</b> State: <b>Florida</b> Zip Code: <b>34601</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(352) 799-7881</b> ext. Fax: <b>(352) 540-4794</b>
4. Owner/Authorized Representative E-mail Address: <b>jdaniel@cemexusa.com</b>
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>   Signature   Date

**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name: <b>Mr. James S. Daniel, Plant Manager</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>CEMEX Construction Materials Florida, LLC</b> Street Address: <b>10311 Cement Plant Road</b> City: <b>Brooksville</b> State: <b>Florida</b> Zip Code: <b>34601</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(352) 799-7881</b> ext. Fax: <b>(352) 540-4794</b>
4. Owner/Authorized Representative E-mail Address: <b>jdaniel@cemexusa.com</b>
5. Owner/Authorized Representative Statement:  <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>   Signature   Date



# Department of Environmental Protection

## Division of Air Resource Management APPLICATION FOR AIR PERMIT - LONG FORM

Dept. Of Environmental Protection  
**JUN 03 2010**  
Southwest District

### I. APPLICATION INFORMATION

**Air Construction Permit** – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

**Air Operation Permit** – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

**To ensure accuracy, please see form instructions.**

#### Identification of Facility

1. Facility Owner/Company Name: <b>CEMEX Construction Materials Florida, LLC</b>	
2. Site Name: <b>Brooksville South Cement Plant</b>	
3. Facility Identification Number: <b>0530021</b>	
4. Facility Location... Street Address or Other Locator: <b>10311 Cement Plant Road</b> City: <b>Brooksville</b> County: <b>Hernando</b> Zip Code: <b>34601</b>	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

#### Application Contact

1. Application Contact Name: <b>Max Lee, Ph.D., P.E.</b>	
2. Application Contact Mailing Address... Organization/Firm: <b>Koogler and Associates, Inc.</b> Street Address: <b>4014 NW 13<sup>th</sup> Street</b> City: <b>Gainesville</b> State: <b>Florida</b> Zip Code: <b>32609</b>	
3. Application Contact Telephone Numbers... Telephone: <b>(352) 377-5822</b> ext. <b>15</b> Fax: <b>(352) 377-7158</b>	
4. Application Contact E-mail Address: <b>mlee@kooglerassociates.com</b>	

#### Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

APPLICATION INFORMATION

Dept. Of Environmental Protection

JUN 03 2010

Southwest District

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

**Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

**Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

Application is for a revision to the facility Title V permit to incorporate the permit 0530021-022-AC; an-after-the-fact air construction permit for the water spray/injection system (D/F control device) on the downcomer for Kiln No. 1. Attachment A describes the project. Attachment B is the operations data for A.10 and A.11 for the last two months. Based on discussions with Cindy Zhang-Torres, items A.10 and A.11 were intended to be the requested information per permit 0530021-022-AC, item 8.b.

Note that draft permit 0530021-026-AC is likely to be issued soon. It would be preferred to also incorporate that permit into this Title V revision.



APPLICATION INFORMATION

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
020	Cement Kiln No. 1/In-Line Kiln/Raw Mill and Clinker Cooler I with Baghouse		N/A

Application Processing Fee

Check one:  Attached - Amount: \$ \_\_\_\_\_  Not Applicable

**APPLICATION INFORMATION**

**Owner/Authorized Representative Statement**

**Complete if applying for an air construction permit or an initial FESOP.**

1. Owner/Authorized Representative Name: <b>Mr. James S. Daniel, Plant Manager</b>
2. Owner/Authorized Representative Mailing Address... Organization/Firm: <b>CEMEX Construction Materials Florida, LLC</b> Street Address: <b>10311 Cement Plant Road</b> City: <b>Brooksville</b> State: <b>Florida</b> Zip Code: <b>34601</b>
3. Owner/Authorized Representative Telephone Numbers... Telephone: <b>(352) 799-7881</b> ext. Fax: <b>(352) 540-4794</b>
4. Owner/Authorized Representative E-mail Address: <b>jdaniel@cemexusa.com</b>
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>   Signature   Date

**APPLICATION INFORMATION**

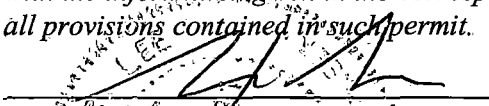
**Application Responsible Official Certification**

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

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input 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, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <span>City:</span> <span>State:</span> <span>Zip Code:</span> </div>
4. Application Responsible Official Telephone Numbers... Telephone: ( ) - ext. Fax: ( ) -
5. Application Responsible Official E-mail Address:
6. Application Responsible Official Certification:  <i>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.</i>
<div style="display: flex; justify-content: space-between; margin-top: 20px;"> <span>_____ Signature</span> <span>_____ Date</span> </div>

**APPLICATION INFORMATION**

**Professional Engineer Certification**

1. Professional Engineer Name: <b>Max Lee, Ph.D., P.E.</b> Registration Number: <b>58091</b>
2. Professional Engineer Mailing Address... Organization/Firm: <b>Koogler and Associates, Inc.</b> Street Address: <b>4014 NW 13<sup>th</sup> Street</b> City: <b>Gainesville</b> State: <b>Florida</b> Zip Code: <b>32609</b>
3. Professional Engineer Telephone Numbers... Telephone: <b>(352) 377-5822</b> ext.13 Fax: <b>(352) 377-7158</b>
4. Professional Engineer E-mail Address: <b>mlee@kooglerassociates.com</b>
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 _____ Date <u>6/2/10</u> (seal)

\* Attach any exception to certification statement.

## II. FACILITY INFORMATION

### A. GENERAL FACILITY INFORMATION

#### Facility Location and Type

1. Facility UTM Coordinates... Zone 17      East (km) <b>360.0</b> North (km) <b>3162.5</b>		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) <b>28/35/00</b> Longitude (DD/MM/SS) <b>82/25/53</b>	
3. Governmental Facility Code: <b>0</b>	4. Facility Status Code: <b>A</b>	5. Facility Major Group SIC Code: <b>32</b>	6. Facility SIC(s): <b>3241</b>
7. Facility Comment :			

#### Facility Contact

1. Facility Contact Name: <b>Mr. George Townsend, Environmental Manager</b>
2. Facility Contact Mailing Address... Organization/Firm: <b>CEMEX Construction Materials Florida, LLC</b> Street Address: <b>10311 Cement Plant Road</b> City: <b>Brooksville</b> State: <b>Florida</b> Zip Code: <b>34601</b>
3. Facility Contact Telephone Numbers: Telephone: <b>(352) 799-7881</b> Fax: <b>(352) 796-6281</b>
4. Facility Contact E-mail Address: <b>GTownsend@cemexusa.com</b>

#### Facility Primary Responsible Official

**Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."**

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City:                                      State:                                      Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: ( ) -                      ext.                      Fax: ( ) -
4. Facility Primary Responsible Official E-mail Address:

**Facility Regulatory Classifications**

**Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”**

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment:	

**List of Pollutants Emitted by Facility**

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM	A	N
PM <sub>10</sub>	A	N
SO <sub>2</sub>	A	N
NO <sub>x</sub>	A	N
CO	A	N
VOC	A	N
HAPS - Total	A	N
DIOX	B	N
H114 (Mercury)	B	N
SAM	B	N
FL	B	N

**B. EMISSIONS CAPS**

**Facility-Wide or Multi-Unit Emissions Caps N/A**

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap

7. Facility-Wide or Multi-Unit Emissions Cap Comment:



### C. FACILITY ADDITIONAL INFORMATION

#### Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>11/21/08</b>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>11/21/08</b>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <b>2006 (-11-AV)</b>

#### Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment A</b>
3. Rule Applicability Analysis: <input checked="" type="checkbox"/> Attached, Document ID: <b>Attachment A</b>
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**C. FACILITY ADDITIONAL INFORMATION (CONTINUED)**

**Additional Requirements for FESOP Applications N/A**

1. List of Exempt Emissions Units:

- Attached, Document ID: \_\_\_\_\_  Not Applicable (no exempt units at facility)

**Additional Requirements for Title V Air Operation Permit Applications N/A**

1. List of Insignificant Activities: (Required for initial/renewal applications only)

- Attached, Document ID: \_\_\_\_\_  Not Applicable (revision application)

2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)

- Attached, Document ID: \_\_\_\_\_  
 Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)

- Attached, Document ID: \_\_\_\_\_

Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)

- Attached, Document ID: \_\_\_\_\_  
 Equipment/Activities Onsite but Not Required to be Individually Listed  
 Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)

- Attached, Document ID: \_\_\_\_\_  Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:

- Attached, Document ID: \_\_\_\_\_  Not Applicable

**Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program**

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: \_\_\_\_\_

Not Applicable (not an Acid Rain source)

Phase II NO<sub>x</sub> Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: \_\_\_\_\_

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: \_\_\_\_\_

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: \_\_\_\_\_

Not Applicable (not a CAIR source)

3. Hg Budget Part (DEP Form No. 62-210.900(1)(c)):

Attached, Document ID: \_\_\_\_\_  Previously Submitted, Date: \_\_\_\_\_

Not Applicable (not a Hg Budget unit)

**Additional Requirements Comment**

## EMISSIONS UNIT INFORMATION

Section [1] of [1]

EU 020 - Kiln No. 1

### III. EMISSIONS UNIT INFORMATION

**Title V Air Operation Permit Application** - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

**Air Construction Permit or FESOP Application** - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application** - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

EU 020 - Kiln No. 1

**A. GENERAL EMISSIONS UNIT INFORMATION**

**Title V Air Operation Permit Emissions Unit Classification**

1. Regulated or Unregulated Emissions Unit? (Check one, if applying for an initial, revised or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)
- The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.
- The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

**Emissions Unit Description and Status**

1. Type of Emissions Unit Addressed in this Section: (Check one)
- This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).
- This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.
- This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in this Section:  
**Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I with Baghouse**

3. Emissions Unit Identification Number: **020**

4. Emissions Unit Status Code: <b>A</b>	5. Commence Construction Date:	6. Initial Startup Date:	7. Emissions Unit Major Group SIC Code: <b>32</b>
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8. Federal Program Applicability: (Check all that apply) **N/A**
- Acid Rain Unit
- CAIR Unit
- Hg Budget Unit

9. Package Unit:  
 Manufacturer: \_\_\_\_\_ Model Number: \_\_\_\_\_

10. Generator Nameplate Rating: **MW**

11. Emissions Unit Comment: **Refer to Attachment A for a description of the completed project. CEMEX is not requesting any change in emission limits or production rates as part of this project.**

**EMISSIONS UNIT INFORMATION**

Section **[1]** of **[1]**

**EU 020 - Kiln No. 1**

**Emissions Unit Control Equipment/Method: Control 1 of 2**

1. Control Equipment/Method Description:  
**Baghouse – High Temperature**

2. Control Device or Method Code: **016**

**Emissions Unit Control Equipment/Method: Control 2 of 2**

1. Control Equipment/Method Description:  
**Water Spray/Injection System in Downcomer (Quench System)**

2. Control Device or Method Code: **122**

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

EU 020 - Kiln No. 1

**H. CONTINUOUS MONITOR INFORMATION**

**Complete if this emissions unit is or would be subject to continuous monitoring.**

**Continuous Monitoring System:** Continuous Monitor 1 of 1

1. Parameter Code: <b>TEMP</b>	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input checked="" type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment: <b>CEMEX will continuously monitor the outlet temperature of the downcomer to maintain the appropriate water injection rate of the water spray/injection system to ensure compliance with the D/F emission standards.</b>	

**Continuous Monitoring System:** Continuous Monitor    of   

1. Parameter Code:	2. Pollutant(s):
3. CMS Requirement:	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information... Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment:	

**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

EU 020 - Kiln No. 1

**I. EMISSIONS UNIT ADDITIONAL INFORMATION**

**Additional Requirements for All Applications, Except as Otherwise Stated**

<p>1. Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID _____ <input checked="" type="checkbox"/> Previously Submitted, <b>11/21/08</b></p>
<p>2. Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <b>A</b> <input type="checkbox"/> Previously Submitted, Date _____</p>
<p>3. Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <b>2009 (022-AC)</b></p>
<p>4. Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <b>2009 (022-AC)</b></p> <p><input type="checkbox"/> Not Applicable (construction application)</p>
<p>5. Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought)</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date <b>2009 (022-AC)</b></p> <p><input type="checkbox"/> Not Applicable</p>
<p>6. Compliance Demonstration Reports/Records:</p> <p><input type="checkbox"/> Attached, Document ID: _____</p> <p>    Test Date(s)/Pollutant(s) Tested: _____</p> <p><input type="checkbox"/> Previously Submitted, Date: _____</p> <p>    Test Date(s)/Pollutant(s) Tested: _____</p> <p><input type="checkbox"/> To be Submitted, Date (if known): _____</p> <p>    Test Date(s)/Pollutant(s) Tested: _____</p> <p><input checked="" type="checkbox"/> Not Applicable</p> <p>Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.</p>
<p>7. Other Information Required by Rule or Statute:</p> <p><input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>



**EMISSIONS UNIT INFORMATION**

Section [1] of [1]

EU 020 - Kiln No. 1

**I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)**

**Additional Requirements for Air Construction Permit Applications**

1. Control Technology Review and Analysis (Rules 62-212.400(10) and 62-212.500(7), F.A.C.; 40 CFR 63.43(d) and (e)): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
2. Good Engineering Practice Stack Height Analysis (Rules 62-212.400(4)(d) and 62-212.500(4)(f), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
3. Description of Stack Sampling Facilities: (Required for proposed new stack sampling facilities only) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

**Additional Requirements for Title V Air Operation Permit Applications N/A**

1. Identification of Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____
2. Compliance Assurance Monitoring: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
3. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable
4. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable

**Additional Requirements Comment**

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**ATTACHMENT A**  
**PROJECT DESCRIPTION**

## **ATTACHMENT A**

### **PROJECT DESCRIPTION**

CEMEX Construction Materials Florida, LLC (CEMEX) operates a Portland Cement Kiln (Kiln No. 1, EU 020) at their Brooksville South Cement Plant. In accordance with a Compliance Plan approved by the Department, on or about March 20, 2009, CEMEX recently installed a water spray/injection system on the downcomer of the Kiln No. 1 preheater tower. The water spray/injection system provides sufficient cooling (evaporative) to rapidly quench the temperature of the gas leaving the preheater, with micro water droplet sprays, through the temperature window associated with D/F formation.

In 2008, CEMEX conducted D/F testing on Kiln No. 1 that indicated exceedances of the D/F emission standard (40 CFR 63 Subpart LLL). On December 10, 2008, FDEP issued a warning letter to CEMEX regarding these violations. Following this letter, FDEP met with CEMEX to discuss establishment of a Compliance Plan to address the D/F violations. On January 29, 2009, CEMEX submitted the Compliance Plan to FDEP, and on March 20 (following a letter dated February 25, 2009) an email dated February 16, 2009 and a site visit to the plant on February 12, 2009 which requested additional information and cited two exceptions to the proposed Compliance Plan) FDEP approved the Plan.

In accordance with the Compliance Plan, CEMEX installed the proposed water spray system and performed D/F compliance testing on May 1, 2009 which demonstrated that the D/F emission rate was below the standard. Following CEMEX's submittal of the May 1, 2009 test results, DEP issued a letter on April 2, 2009 stating that an after-the-fact air construction permit application was required for the installation of the water spray/injection system as a control device for D/F. The application was submitted and the Department authorized an after-the-fact AC permit (0530021-022-AC) on December 4, 2009. The Department has drafted an AC permit revision (0530021-026-AC) to modify Specific Conditions A.3.a and A.3.b. The public notice has been completed and the modification is expected to be authorized shortly.

CEMEX installed a TurboSonic, Inc. water injection system to minimize the formation of D/F emissions by rapidly quenching the preheater exhaust gas temperature through the temperature

window 750 – 400°F. The TurboSonic system currently consists of 3 spray lances that can deliver water droplets of 38 microns in diameter at a spray velocity of 50 meters per second. The water injection/spray system provides rapid and uniform cooling of the gas stream. With the rapid and uniform temperature quench, CEMEX is able to consistently and predictably minimize the D/F concentration in the stack gas from Kiln No. 1 during operations with both the raw mill down and power plant down, and ensure compliance with the D/F emission limiting concentration standard of 0.2-0.4 nanograms per dry standard cubic meter at seven percent oxygen. The required water injection rate varies based on factors such as kiln temperature and ambient temperature. CEMEX monitors the outlet temperature of the downcomer to control the proper water injection rate to ensure adequate cooling.

The purpose of the water spray/injection system is to minimize the formation of D/F emissions and assure compliance with the D/F emissions standards only while both the raw mill and power plant are NOT operating. The water spray/injection system is not required to operate at other times. This operating scenario rarely occurs as shown in Attachment B of recent operation data.

Permit 0530021-022-AC item 8 states:

8. Application for Title V Air Operation Permit - This permit authorizes construction and initial operation of the permitted emission control device. A Title V air operation permit revision is required for continued operation of the permitted emissions control device. The owner or operator shall apply for a Title V air operation permit revision no later than 180 days after final issuance of this permit. To apply for a Title V air operation permit revision, the applicant shall submit the following:
  - a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>*);
  - b. copies of the most recent two months of records specified in Specific Condition No(s). A.9. and A.10.

The application shall be submitted to the Permitting Authority.

[Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.220 and 62-213.420(1)(a)3., F.A.C.]

Following phone conversation between Max Lee with Koogler & Associates, Inc. and consultant to CEMEX, and Cindy Zhang-Torres with the Department, item 8.b was noted by Mrs. Zhang-Torres to be erred and instead should state that two months of records of Specific Conditions

A.10 and A.11 be provided. Item A.9 only states the notices to be provided to the Department.

Items A.9 – A.11 are copied below:

#### NOTIFICATION REQUIREMENTS

- A.9. Test Notification - The owner or operator shall notify the Compliance Authority in writing prior to any required tests in accordance with the current facility's Title V air operation permit, 40 CFR 63 Subpart LLL, and any applicable Department consent order in effect for this emission unit.

*{Permitting Note: The notification should also include the relevant emission unit ID No(s), test method(s) to be used, and pollutants to be tested.}*

[Rules 62-4.070(3), 62-204.800(11) and 62-297.310(7)(a)9., F.A.C.; 40 CFR 63 Subparts A and LLL]

#### RECORDS AND REPORTS

- A.10. Kiln 1 Operational Data - The owner or operator shall keep records of all periods of operation of Kiln 1. The records shall show each time that the raw mill was taken out of service or put back in service, and each time that the power plant was taken out of service or put back in service (records shall indicate when the power plant was in start-up mode). For all periods of Kiln 1 operation when the raw mill is down and the power plant is down (i.e., the RMD/PPD mode of kiln operation) the records shall show the operating status of the Kiln 1 Downcomer Water Spray/Injection System (in or out of service).

[Rule 62-4.070(3), F.A.C.]

- A.11. Kiln 1 Downcomer Water Spray/Injection System Operational Data - The owner or operator shall keep continuous records of the following Kiln 1 Downcomer Water Spray/Injection System operational data during all periods of operation of Kiln 1 when the raw mill is down and the power plant is down (i.e., the RMD/PPD mode of kiln operation);

- a. the gas temperature (°F) at the downcomer exit/fan inlet (at the new K13 thermocouple - Thermocouple ID T1207A) (the monitoring system shall also

determine and show rolling 60-minute rolling average temperatures); and

- b. the Kiln 1 Downcomer Water Spray/Injection System water flow rate (gallons/minute) (the monitoring system shall also determine and record rolling 60 minute rolling average gallon/minute flow rate).

[Rule 62-4.070(3), F.A.C.]

As such, the information in Attachment B is of items A.10 and A.11.

Note that Kiln 1 was shutdown for January through March of 2010 due to economic conditions. Emissions testing required by permit specific condition A.6 was performed on April 8 and 9, 2010 showing compliance to the D/F standard. The Kiln 1 was specifically restarted to complete this testing requirement of the water spray/injection system.

The Startup Shutdown, Malfunction (SSM) Plan was revised to incorporate the water spray/injection system per permit 0530021-022, specific condition A.14. The Department requested further revision of the SSM plan by letter from Danielle Henry to George Townsend dated May 18, 2010. The SSM plan is under further revision and due to the Department by July 1, 2010 per email from Danielle Henry to George Townsend dated June 1, 2010.

**ATTACHMENT B**

**OPERATIONS DATA**

**0530021-022-AC  
SPECIFIC CONDITIONS A.10 AND A.11**



### Operating Hours

DF Compliance Tests - Raw Mill Off, Power Plant Off						
	Kiln No. 1 Operating Hours	Maximum Daily Baghouse Temperature (1-minute average)	Raw Mill No. 1 Operating Hours	Kiln No. 1 Operating Hours w/Raw Mill Down	Power Plant Operating Hours	Kiln No. 1 Operating With Raw Mill Down & Power Plant Down
1-Apr-10	24.00		24.00	0.00	21.00	0.00
2-Apr-10	20.70	335.10	20.40	0.30	0.00	0.30
3-Apr-10	24.00		24.00	0.00	0.00	0.00
4-Apr-10	24.00		24.00	0.00	0.00	0.00
5-Apr-10	15.20	355.70	14.92	0.28	0.00	0.28
6-Apr-10	0.00		0.00	0.00	0.00	0.00
7-Apr-10	12.58	302.50	10.33	2.25	0.00	2.50
8-Apr-10	24.00		14.70	9.30	0.00	9.30
9-Apr-10	24.00		18.10	5.90	0.00	5.90
10-Apr-10	24.00		24.00	0.00	0.00	0.00
11-Apr-10	24.00		24.00	0.00	0.00	0.00
12-Apr-10	24.00		24.00	0.00	0.00	0.00
13-Apr-10	24.00	384.20	21.80	2.20	12.48	2.20
14-Apr-10	7.10		8.80	0.00	10.45	0.00
15-Apr-10	0.00		0.00	0.00	0.00	0.00
16-Apr-10	0.00		0.00	0.00	0.00	0.00
17-Apr-10	0.00		0.00	0.00	0.00	0.00
18-Apr-10	0.00		0.00	0.00	0.00	0.00
19-Apr-10	0.00		0.00	0.00	0.00	0.00
20-Apr-10	9.47	288.60	6.50	2.97	0.00	2.97
21-Apr-10	24.00		24.00	0.00	18.23	0.00
22-Apr-10	24.00		24.00	0.00	24.00	0.00
23-Apr-10	24.00		24.00	0.00	24.00	0.00
24-Apr-10	23.10		17.70	5.40	24.00	0.00
25-Apr-10	24.00		18.60	5.40	24.00	0.00
26-Apr-10	24.00		21.92	2.08	24.00	0.00
27-Apr-10	24.00		24.00	0.00	24.00	0.00
28-Apr-10	24.00		24.00	0.00	24.00	0.00
29-Apr-10	24.00		24.00	0.00	24.00	0.00
30-Apr-10	24.00		24.00	0.00	24.00	0.00
1-May-10	24.00		24.00	0.00	24.00	0.00
2-May-10	24.00		24.00	0.00	24.00	0.00
3-May-10	24.00		24.00	0.00	24.00	0.00
4-May-10	24.00		24.00	0.00	24.00	0.00
5-May-10	24.00		12.92	11.08	24.00	0.00
6-May-10	21.90		20.50	1.40	24.00	0.00
7-May-10	24.00		24.00	0.00	24.00	0.00
8-May-10	24.00		24.00	0.00	24.00	0.00

SU

SU

### Operating Hours

DF Compliance Tests - Raw Mill Off, Power Plant Off						
	Kiln No. 1 Operating Hours	Maximum Daily Baghouse Temperature (1-minute average)	Raw Mill No. 1 Operating Hours	Kiln No. 1 Operating Hours w/Raw Mill Down	Power Plant Operating Hours	Kiln No. 1 Operating With Raw Mill Down & Power Plant Down
9-May-10	24.00		24.00	0.00	24.00	0.00
10-May-10	24.00		24.00	0.00	24.00	0.00
11-May-10	24.00		24.00	0.00	24.00	0.00
12-May-10	24.00		24.00	0.00	24.00	0.00
13-May-10	24.00		12.48	11.52	24.00	0.00
14-May-10	24.00		24.00	0.00	24.00	0.00
15-May-10	24.00		24.00	0.00	10.63	0.00
16-May-10	24.00		24.00	0.00	0.00	0.00
17-May-10	24.00		24.00	0.00	5.02	0.00
18-May-10	24.00		24.00	0.00	24.00	0.00
19-May-10	24.00		24.00	0.00	24.00	0.00
20-May-10	24.00		24.00	0.00	24.00	0.00
21-May-10	24.00		24.00	0.00	22.00	0.00
22-May-10	24.00		24.00	0.00	0.00	0.00
23-May-10	23.83		24.00	-0.17	4.13	0.00
24-May-10	24.00		24.00	0.00	24.00	0.00
25-May-10	21.53		20.68	0.85	24.00	0.00
26-May-10	24.00		24.00	0.00	24.00	0.00
27-May-10	24.00		24.00	0.00	24.00	0.00
28-May-10	24.00		17.22	6.78	24.00	0.00
29-May-10	22.55		18.20	4.35	24.00	0.00
30-May-10	24.00		24.00	0.00	24.00	0.00
31-May-10	24.00		24.00	0.00	24.00	0.00
<b>Total Hours</b>						23.45
<b>Compliance Test Hours</b>						15.20
<b>Kiln No. 1 Operating w/Raw Mill Down &amp; Power Plant Down</b>						8.25

SU - Power Plant Start Up

SU  
SU

**CEMEX Construction Materials Florida, LLC**  
**Brooksville South Cement Plant**

Date: 8-Apr-10 Run No. 1 Raw Mill Up (RMU) Power Plant Down (PPD) Test: Dioxins/Furans Source: Kiln No. 1  
 Start 10:09  
 End 13:32

Printout Pkg.	Relative Time	Preheater Feed Rate TPH	Kiln Feed Rate TPH	Clinker Production Rate TPH	Tire Rate Lbs/Min	Tire Rate TPH	Coal Feed Rate TPH	Iron Ore TPH	Black Beauty TPH	Down Corner - PH Exit	K13 Kiln ID Fan Inlet	K13 Kiln ID Fan Exit	Instant. Baghouse Inlet	Stack Opacity	New K13 Kiln ID Fan Inlet TT-207A	Water Injection Rate	Compressed Air acfm	Pie Damper	K13 Damper	E4901	E4908	E4902	E4904	E4907
1	10:09	131.0	120.9	78.6	35.0	1.1	8.7	0.0	0.0	805	395	397	257	2.8	388.4	74.3	153.8	0.0	16.9	Closed	4.5	99.6	38.0	Open
2	10:40	132.0	121.8	79.2	35.0	1.1	8.0	0.0	0.0	800	374	379	252	2.7	376.5	72.2	153.8	0.0	16.0	Closed	4.4	99.5	38.0	Open
3	11:30	132.0	121.8	79.2	35.0	1.1	7.8	0.0	0.0	780	369	372	260	2.7	378.2	68.5	154.7	0.0	17.4	Closed	4.4	99.5	38.0	Open
4	12:15	133.0	122.8	79.8	35.0	1.1	8.1	0.0	0.0	796	377	380	272	2.8	384.5	68.5	155.0	0.0	18.5	Closed	4.1	99.5	38.0	Open
5	13:00	135.0	124.6	81.0	35.0	1.1	8.1	0.0	0.0	806	377	382	268	2.8	384.4	70.4	155.3	0.0	18.5	Closed	4.0	99.5	38.0	Open
<b>Averages</b>		<b>132.6</b>	<b>122.4</b>	<b>79.8</b>	<b>35.0</b>	<b>1.1</b>	<b>8.1</b>						<b>262</b>											

	Test Avg.	90% Of Max	Max Rate
Preheater Feed Rate TPH =	133	124.2	138
Kiln Feed Rate TPH =	122	114.3	127
Clinker Production Rate TPH =	80	74.7	83

Coal Heat Content Btu/Lb = 13,366 March '10 Average

Tire Heat Content/Btu/Lb = 11,278 Typical

**CEMEX Construction Materials Florida, LLC**  
**Brooksville South Cement Plant**

Date: 8-Apr-10 Run No. 2 Raw Mill Up (RMU) Power Plant Down (PPD) Test: Dioxins/Furans Source: Kiln No. 1  
 Start 13:52  
 End 17:19

Printout Pkg.	Relative Time	Preheater Feed Rate TPH	Kiln Feed Rate TPH	Clinker Production Rate TPH	Tire Rate Lbs/Min	Tire Rate TPH	Coal Feed Rate TPH	Iron Ore TPH	Black Beauty TPH	Down Corner - PH Exit	K13 Kiln ID Fan Inlet	K13 Kiln ID Fan Exit	Instant. Baghouse Inlet	Stack Opacity	New K13 Kiln ID Fan Inlet TT-207A	Water Injection Rate	Compressed Air acfm	Pie Damper	K13 Damper	E4901	E4908	E4902	E4904	E4907
6	1:55	135.0	124.6	81.0	35.0	1.1	7.9	0.0	0.0	791	381	376	268	3.5	384.8	67.5	161.9	0.0	18.4	Closed	3.9	99.5	37.8	Open
7	2:34	136.0	125.5	81.6	35.0	1.1	7.9	0.0	0.0	789	383	375	275	3.4	382.7	67.6	156.5	0.0	18.4	Closed	3.7	99.5	38.0	Open
8	3:18	136.0	125.5	81.6	35.0	1.1	8.2	0.0	0.0	789	381	376	278	3.0	382.0	68.3	157.9	0.0	18.5	Closed	3.7	99.5	38.0	Open
9	4:14	134.0	123.7	80.4	35.0	1.1	7.9	0.0	0.0	791	385	378	273	2.8	383.8	68.8	154.5	0.0	18.6	Closed	4.4	99.5	38.0	Open
10	4:59	135.0	124.6	81.0	35.0	1.1	7.9	0.0	0.0	787	374	374	278	2.7	380.9	67.4	159.7	0.0	18.6	Closed	3.1	99.5	38.0	Open
11	5:20	137.0	126.5	82.2	35.0	1.1	8.1	0.0	0.0	785	379	374	283	2.4	382.6	67.8	157.3	0.0	18.6	Closed	3.1	99.5	38.0	Open
<b>Averages</b>		<b>135.5</b>	<b>125.1</b>	<b>81.3</b>	<b>35.0</b>	<b>1.1</b>	<b>8.0</b>						<b>276</b>											

	Test Avg.	90% Of Max	Max Rate
Preheater Feed Rate TPH =	136	124.2	138
Kiln Feed Rate TPH =	125	114.3	127
Clinker Production Rate TPH =	81	74.7	83

Coal Heat Content Btu/Lb = 13,366 March '10 Average

Tire Heat Content Btu/Lb = 11,278 Typical

**CEMEX Construction Materials Florida, LLC**  
**Brooksville South Cement Plant**

Date: 9-Apr-10 Run No. 3 Raw Mill Up (RMU) Power Plant Down (PPD) Test: Dioxins/Furans Source: Kiln No. 1  
 Start 9:05  
 End 12:27

Printout Pkg.	Relative Time	Preheater Feed Rate TPH	Kiln Feed Rate TPH	Clinker Production Rate TPH	Tire Rate Lbs/Min	Tire Rate TPH	Coal Feed Rate TPH	Iron Ore TPH	Black Beauty TPH	Down Corner - PH Exit	K13 Kiln ID Fan Inlet	K13 Kiln ID Fan Exit	Instant. Baghouse Inlet	Stack Opacity	New K13 Kiln ID Fan Inlet TT-207A	Water Injection Rate	Compressed Air acfm	Pie Damper	K13 Damper					
																				Temp *F				Act %
																				E4901	E4908	E4902	E4904	E4907
12	9:06	133.0	122.8	79.8	35.0	1.1	8.2	0.0	0.0	812	388	396	265	2.7	387.4	76.9	157.8	0.00	18.5	Closed	3.6	99.5	37.9	Open
13	9:50	134.0	123.7	80.4	35.0	1.1	8.3	0.0	0.0	803	380	379	262	2.6	380.8	71.3	164.9	0.00	18.5	Closed	3.6	99.5	38.3	Open
14	10:35	131.0	120.9	78.6	35.0	1.1	8.5	0.0	0.0	804	386	383	273	2.8	388.0	72.2	159.7	0.00	19.5	Closed	6.8	99.5	38.3	Open
15	11:24	133.0	122.8	79.8	35.0	1.1	8.2	0.0	0.0	803	390	374	268	2.8	383.3	71.9	157.8	0.00	19.5	Closed	6.7	99.5	37.9	Open
16	12:08	134.0	123.7	80.4	35.0	1.1	8.2	0.0	0.0	791	375	369	270	3.2	375.9	69.9	156.9	0.00	19.5	Closed	6.9	99.5	37.9	Open
17	12:32	137.0	126.6	82.2	35.0	1.1	7.9	0.0	0.0	786	377	374	272	3.2	377.2	68.5	164.4	0.00	19.5	Closed	6.9	99.5	37.9	Open
<b>Averages</b>		<b>133.7</b>	<b>123.4</b>	<b>80.2</b>	<b>35.0</b>	<b>1.1</b>	<b>8.2</b>						<b>268</b>											

	Test Avg.	90% Of Max	Max Rate
Preheater Feed Rate TPH =	134	124.2	138
Kiln Feed Rate TPH =	123	114.3	127
Clinker Production Rate TPH =	80	74.7	83

Coal Heat Content Btu/Lb = 13,366 March '10 Average

Tire Heat Content Btu/Lb = 11,278 Typical