



March 30, 2011

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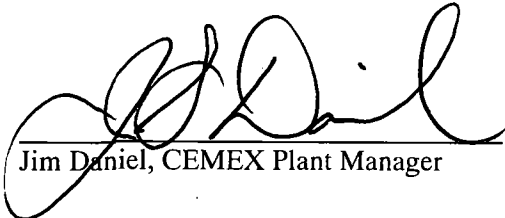
Mr. Jon Holtom
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

**RE: Comments on 0530021-021-AV Draft Permit
Central Power and Lime and CEMEX Construction Materials Florida, LLC
Brooksville South Cement Plant; Facility ID: 0530021**

Dear Mr. Holtom:

Enclosed please find a hardcopy of the comments provided to you by Max Lee of Koogler and Associates, Inc. on March 29, 2010 via email. We are providing these same comments to you under signature to confirm approval. If you have any questions, please feel free to call (352) 799-7881 regarding this submittal. We sincerely appreciate your time and consideration of these comments.

Sincerely,


Jim Daniel, CEMEX Plant Manager


Terry Woodard, CPL Power Plant Manager

Cc: Larry Roberts, CPL
George Townsend, CEMEX
Max Lee, Ph.D., P.E. (re: KA projects 307-08-07/307-10-14/308-10-09)

Brooksville South Plant

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

Draft Permit 0530021-021-AV Comments

Document: 0530021-021-AV PE Certification.PDF
Facility title should be addressed to BOTH Cemex and CPL

Document: 0530021-021-AV SOB.PDF
Facility title should be addressed to BOTH Cemex and CPL. The statement of the Resp. Official should include Terry Woodard. The PRIMARY REGULATORY REQUIREMENTS section should specify whether Cemex or CPL is subject.

Document: 0530021-021-AVAppendixCAMRevision.PDF
Page 6, 8, and 11 of 12 should specify the owners of the emissions units.

Document: 0530021-021-AVAppendixHRevision.PDF
Facility title should be addressed to BOTH Cemex and CPL

Document: 0530021-021-AVAppendixIRRevision.PDF
Facility title should be addressed to BOTH Cemex and CPL. Florida Crushed Stone should be removed.

Documents: 0530021-021-AVSignedWrittenNoticeofRevision.pdf
Facility title should be addressed to BOTH Cemex and CPL. The statement of the Resp. Official should include Terry Woodard.
Facility Location statement should list Cemex and CPL not just Cemex.

Document: 0530021.021.AV.PermitRevision.pdf

Cover letter:

Facility title should be addressed to BOTH Cemex and CPL. The statement of the Resp. Official should include Terry Woodard.

1. Page 1 - The power plant ownership is Arroyo Energy. DEP acknowledges that CEMEX does not own the power plant. We appreciate this acknowledgement.
2. Page 2 – The indicated 138 TPH cement production limit should be 240 TPH. The mathematics of the corresponding annual limit for this unit does not coincide with 138 TPH. This is a Scribner error during the permit writing of 0530021-009-AC which was based on a previous plant design by Polysius (Permit -009-AC). The as-built plant, FLSchmidt design (Permit -018-AC), changed the rate from 138 tph to 240 tph.

3. Page 37 – Replace Florida Crushed Stone with CEMEX
4. Page 49 – Request to clarify that NESHAP testing and reporting timelines are based on EPA rules as the NESHAP program is a delegated program to DEP.
5. Page 76 - The indicated 138 TPH cement production limit should be 240 TPH. See comment above.
6. Page 77 – Section K.4 Process Rate Limitations, clarify that the process rate of 225 TPH, needs to be designated as “dry basis” rate. This clarification does not modify or relax any permit condition.

Suggest to revise permit language to state:

The new raw material and handling storage shall not process more than 225 tons per hour (dry basis. Typical moisture is 15 percent) of raw material (1,971,000 tons per year) in any consecutive 12-month period.

7. Page 88 – First paragraph talks about “covered coal storage” this is new language and there is not covered coal storage and no “bucket elevator” in the coal handling process for line 2

Suggest to revise permit language to state:

~~Coal and petroleum coke is received by railcar. The bucket elevator discharges either into a covered storage facility or onto a belt and then to a bin. Coal and petroleum coke in covered storage is reclaimed by a front end loader through the unloading system.~~ The milled fuels are stored in a pulverized fuel storage bin for pneumatic conveyance to the main burner and precalciner burner.

8. There is no mention of “Acid Rain” Program” applicability for K1 & K2, pages 1 – 101. K1 and K2 should not be subject to the Acid Rain Program.
9. Section IV “Acid Rain Part” is the power plant section. This page lists CEMEX as the power plant operator; this is incorrect

Appendix I-1, List of Insignificant Emissions Units and/or Activities

Florida Crushed Stone Company **Permit No.:** 0530021-021-AV

Brooksville Cement and Power Plants **Facility ID No.:** 0530021

Need to change FCS to Cemex Construction Materials Florida, LLC

Document: 0530021.021.AVAppendixO&MPlanRevision.PDF

Document needs to be revised to list Cemex not FCS and address the Cemex is responsible for certain units ONLY.

Document: Cemex Kiln 2 - APPENDIX CP 11-02-2010.PDF

Facility title should be addressed to BOTH Cemex and CPL. The statement of the Resp. Official should include Terry Woodard.

Document: DTrina Memo revision021.PDF

Facility title should be addressed to BOTH Cemex and CPL. The statement of the Resp. Official should include Terry Woodard.

Document: PublicNoticeRevision021.PDF

Facility title should be addressed to BOTH Cemex and CPL. The statement of the Resp. Official should include Terry Woodard.