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307-11-11
May 26, 2011

Via USPS

Mr. Jeff Koerner, Program Administrator
Florida Department of Environmental Protection
New Source Review Section
2600 Blairstone Road MS 5500
Tallahassee, Florida 32399-2400

**SUBJECT: CEMEX Construction Materials Florida, LLC
Brooksville South Cement Plant; Brooksville, Florida
Project No. 0530021-028-AC; Request for Extension**

Dear Jeff:

On behalf of CEMEX Construction Materials Florida, LLC (CEMEX), Koogler and Associates, Inc. (Koogler), is requesting a two year extension to permit 0530021-028-AC issued on June 17, 2010. The extension is requested to provide additional time to complete the installation of the Tire Injection Mechanism System (TIMS) on Kiln 1 at the Brooksville South cement plant as originally permitted by 0530021-016-AC. Following is a summary of the permit history associated with the TIMS on Kiln 1:

Permit 0530021-016-AC was issued on March 4, 2009 authorizing installation of a TIMS on Kiln 1. The permit provided for the introduction of tires near the product end (hot side) of the kiln in addition to the feed end (cold side).

Permit 0530021-024-AC, was issued on September 15, 2009 to allow CEMEX further time to locate, install and test a TIM system on Kiln 1. In addition, the extension required CEMEX to perform an initial compliance test for mercury emissions from the power plant-cement plant combination within 90 days of issuance of the extension.

Permit 0530021-028-AC was issued to extend the requirement for compliance testing and the expiration date of Permit 0530021-024-AC from September 1, 2010 to September 1, 2011.

Since the time that Permit 0530021-024-AC was issued on September 15, 2009, Kiln 1 has operated for a total of 78 days, of which only 38 days were in 2010, and 6 days in 2011. Kiln 1 was shut down at the end of February 2011. This operation schedule continues to be driven by market conditions. Given the significant amount of collaboration and coordinated financial and managerial effort required to install and evaluate a TIMS system on this kiln, CEMEX is respectfully requesting another extension of the permit.

Following is a table of the timeline showing the operating history of Kiln 1 since the original permit was issued.

Kiln No. 1 TIMS Operation Hours Since 3/4/2009			
Month	2009	2010	2011
January	--	0	0
February	--	0	171.03
March	282.03	0	0
April	595.15	520.15	0
May	183.78	595.26	0
June	562.38	27.1	0
July	0	0	*
August	697.93	0	*
September	9.8	0	*
October	0	0	*
November	498.79	0	*
December	308.03	0	*
Sub-Total	3137.89	1142.51	171.03
			Total 4,451.43

**The K1 Tims is not anticipated to operate the remainder of 2011*

To document the milestones that have been accomplished to date, a copy of the revised construction schedule that was included in the previous request for an extension is attached. The revised schedule shows completion of items 1 through 4, and 9 through 11. Additionally, the metal framework for the TIMS injector nozzle to the kiln has been installed in preparation of installation of the TIMS.

In consideration of these events, CEMEX requests an extension of the requirement to perform compliance testing (and thereby the time in which to install TIMS on Kiln 1) until **September 1, 2013** (two additional years).

Thank you for your continued assistance with this project. If you have any questions or require additional information, please contact me at (352) 377-5822 or mlee@kooglerassociates.com, or Mr. George Townsend, CEMEX Brooksville South Environmental Manager at (352) 799-7881 or GTownsend@cemexusa.com.

Sincerely,
KOOGLER AND ASSOCIATES, INC.



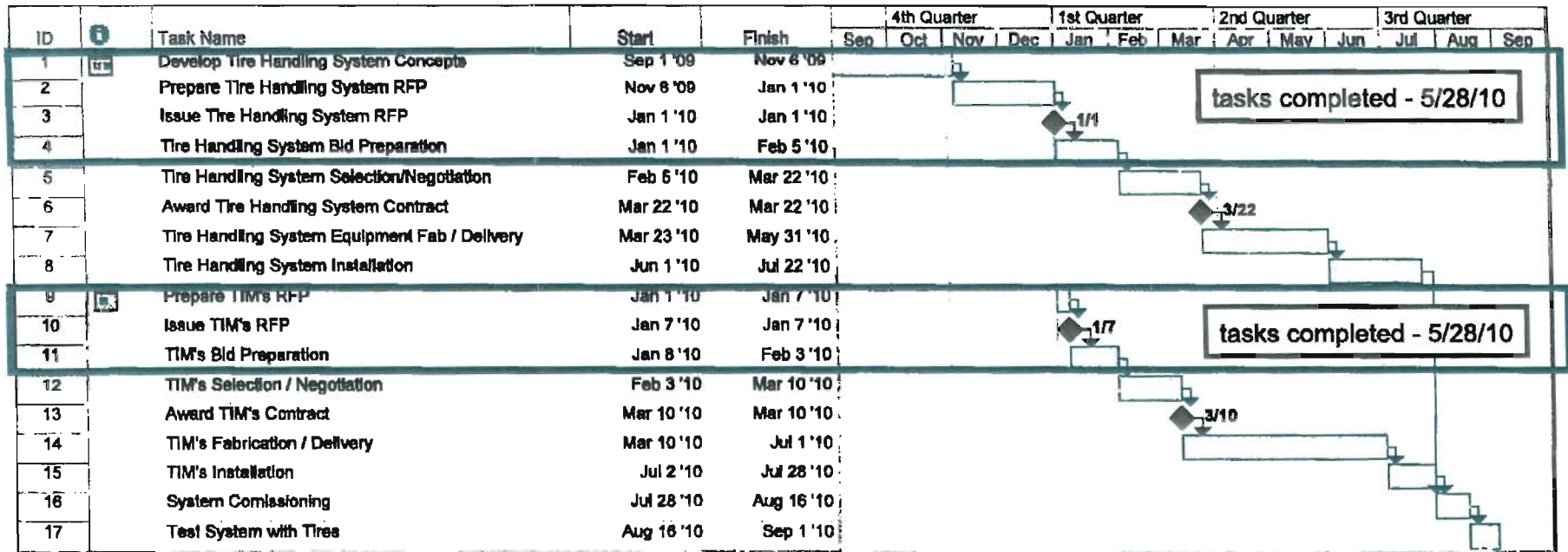
Max Lee, Ph.D., P.E.
President

Enclosure (1)

Cc: G. Townsend, CEMEX (via Email)

MRL/tlr





Project: K1 TIM's Schedule
Date: Nov 2 '09

Task



Milestone



External Tasks



Split



Summary



External Milestone



Progress



Project Summary



Deadline

