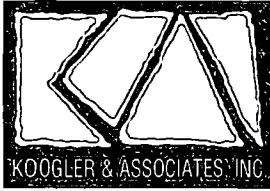


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DIVISION OF AIR
RESOURCE MANAGEMENT



KOUGLER & ASSOCIATES, INC.
Environmental Services
4014 Northwest 13th Street
Gainesville, Florida 32609
352/377-5822 FAX/377-7158

KA 307-10-14/308-10-09
August 8, 2011

Jonathan K. Holtom, P.E., CPM
Program Administrator
Title V Section
Florida Department of Environmental Protection
Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Permit No. 0530021-029-AV
Title V Air Operation Permit Renewal
Response to Request for Additional Information

Dear Mr. Holtom,

Per your request for additional information to the initial Title V air operation permit application, below are the responses to the questions. Please refer to the attachments where it is indicated.

1. If this facility operates stationary reciprocating internal combustion engines, it is subject to regulation under 40 CFR 63, Subpart ZZZZ – National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In addition, please specify if any of the facility's generators or other emissions units are subject to 40 CFR 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines. If applicable,

- a. Please specify how the facility is complying with the applicable subpart(s).*
- b. Please provide the following information for each emission unit subject to the referenced subparts: make and model of engine, fuel, in-service date, manufacture date, horsepower, cylinder displacement, operating hours per year and rule applicability.*

Response:

The RICE rules have been reviewed for the emergency generator for Line 2:

Engine Data:
Brooksville South Cement Plant
Engine - No. 06R0971420
Manufactured - March 2007
Displacement - 14L
Family - 7DDXL14
Emissions control system - EC TAA EGR

We used the EPA tool for determination (<http://www.epa.gov/ttn/atw/rice/output/quiz.html>). It is determined that the emergency generator for Line 2 is subjected to the RICE rules. Please refer to Attachment 1 for detailed information and analysis.

2. In many cases the underlying air construction permit (or permits) reference is omitted from the Allowable Emissions part of the Emission Unit section of the application. Please provide these references.

Response:

The application form has been reviewed to find out where the permit references were omitted. It has been found that the following sections of Allowable Emissions do not have an appropriate permit reference:

- (1) Page 214, EU 018, Allowable Emissions for NO_x
- (2) Page 252, EU 020, Allowable Emissions for PM
- (3) Page 258, EU 020, Allowable Emissions for Dioxin/Furans
- (4) Page 548, EU 052, Allowable Emissions for SO₂
- (5) Page 550, EU 052, Allowable Emissions for NO_x
- (4) Page 552, EU 052, Allowable Emissions for CO

Appropriate permit references have been added to those sections. Please refer to Attachment 2 for the revised forms (for those specific pages).

3. Please provide more detail concerning the items listed Attachment 2010-FCB-FTV1 (List of Insignificant Activities). This listing should be comprehensive covering all areas of the cement and power plants. The application did not list any unregulated units. Please indicate if there are any at the facility and add a description if warranted.

Response:

A more detailed list has been prepared. Please refer to Attachment 3 for the list.

4. Please provide a current compliance assurance monitoring (CAM) applicability determination chart for control devices for all pollutants organized by emissions unit. The chart should utilize updated historical operational data for the most recent five year period. Any existing CAM plans proposed for renewal in the application should be revised if necessary using the most current data. Plans should be based on actual test data.

Response:

An updated CAM applicability determination chart has been prepared. Please refer to Attachment 4 for the chart.

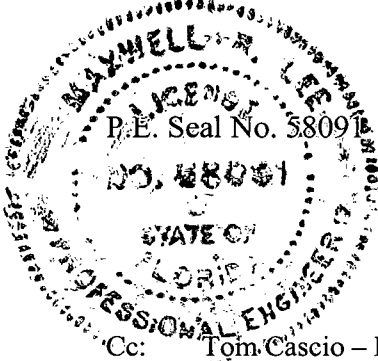
If you have any questions concerning this matter please call me at (352) 377-5822.

Sincerely,



Max Lee, Ph.D., P.E.
President
Koogler and Associates, Inc.

8/8/11
DATE



Cc: Tom Cascio – FDEP (email only – Tom.Cascio@dep.state.fl.us)
George Townsend, Cemex
Larry Roberts, Central Power & Lime
Terry Woodard, Central Power & Lime (email only – WWoodard@deltapowerservices.com)
Lillian DePrimo, Cemex (email only – lillianf.deprimo@cemex.com)
Jim Daniel, Cemex (email only – JDaniel@cemexusa.com)

List of Attachments

| | |
|--------------|---|
| Attachment 1 | RICE Applicability and Analysis |
| Attachment 2 | Revised Application Form of Particular Pages |
| Attachment 3 | Revised List of Insignificant Activities |
| Attachment 4 | Updated CAM Applicability Determination Chart |

ATTACHMENT 1
RICE APPLICABILITY AND ANALYSIS

RICE NESHAP Summary of Requirements¹

Emergency

New & Reconstructed Stationary Engine >500 HP Located at Major Source of HAP

Manufactured on or after December 19, 2002

NOTE: Only the tables relevant to this source category are linked.

Your **compliance date** is upon startup.

Emission Limitations: No requirements

Operating Limitations: No requirements

Fuel Requirements: No requirements

Performance Tests: No requirements

Monitoring, Installation, Collection, Operation and Maintenance Requirements: No Requirements

Initial Compliance: No requirements

Continuous Compliance: 63.6605, 63.6640

§ 63.6605 (a) You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

¹ Disclaimer: The content provided in this software tool is intended solely as assistance for potential reporters to aid in assessing requirements for compliance under the reciprocating internal combustion engines (RICE) National Emissions Standards for Hazardous Air Pollutants, 40 CFR Part 63 Subpart ZZZZ. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by EPA of the applicability of the rule to any particular facility. In any particular case, EPA will make its assessment by applying the law and regulations to the specific facts of the case.

§ 63.6640(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

(b) You must report each instance in which you did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.

(c) [Reserved]

(d) For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a).

(e) You must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you. If you own or operate a new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If you own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, you do not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

(f) *Requirements for emergency stationary RICE.* (1) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not

operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity, except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

(2) If you own or operate an emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed prior to June 12, 2006, you must operate the engine according to the conditions described in paragraphs (f)(2)(i) through (iii) of this section. If you do not operate the engine according to the requirements in paragraphs (f)(2)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by the manufacturer, the vendor, or the insurance company associated with the engine. Required testing of such units should be

minimized, but there is no time limit on the use of emergency stationary RICE in emergency situations and for routine testing and maintenance.

(iii) You may operate your emergency stationary RICE for an additional 50 hours per year in non-emergency situations. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

Notification Requirements: 63.6645 (f)

§ 63.6645 (f) If you are required to submit an Initial Notification but are otherwise not affected by the requirements of this subpart, in accordance with §63.6590(b), your notification should include the information in §63.9(b)(2)(i) through (v), and a statement that your stationary RICE has no additional requirements and explain the basis of the exclusion (for example, that it operates exclusively as an emergency stationary RICE if it has a site rating of more than 500 brake HP located at a major source of HAP emissions).

Recordkeeping Requirements: No requirements

Reporting Requirements: No requirements

General Provisions (40 CFR part 63): No, except as specified in 63.6645(f) (see Notification Requirements above).

ATTACHMENT 2
REVISED APPLICATION FORM FOR PARTICULAR PAGES

EMISSIONS UNIT INFORMATION
 Section [15] of [43]
 EU 018 – Power Plant Boiler

POLLUTANT DETAIL INFORMATION
 Page [4] of [7]
 Nitrogen Oxides – NO_x

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 2

| | |
|---|---|
| 1. Basis for Allowable Emissions Code: OTHER | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: 0.7 lb/MMBtu | 4. Equivalent Allowable Emissions: 846 lb/hour 3,705.5 tons/year |
| 5. Method of Compliance: Annual Method 7 or 7E | |
| 6. Allowable Emissions Comment (Description of Operating Method): NO_x emissions from power plant boiler while burning coal shall not exceed 0.7 pounds per MMBtu heat input, averaging time per Chapter 62-297, F.A.C., not to exceed 846 pounds per hour. | |
| Reference Permit Nos. 0530021-021-AV and 0530021-011-AV. | |

Allowable Emissions Allowable Emissions 2 of 2

| | |
|---|---|
| 1. Basis for Allowable Emissions Code: OTHER | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: 0.16 lb/MMBtu | 4. Equivalent Allowable Emissions: 296 lb/hour 1,296 tons/year |
| 5. Method of Compliance: Fuel oil only during startup | |
| 6. Allowable Emissions Comment (Description of Operating Method): While burning fuel oil during start up. | |
| Reference: Permit NO. 0530021-021-AV. | |

CEMEX FACILITIES

EMISSIONS UNIT INFORMATION
 Section [17] of [43]
 EU 020 – Kiln No. 1

POLLUTANT DETAIL INFORMATION
 Page [1] of [4]
 Particulate Matter – PM

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **4** of **5**

| | |
|---|--|
| 1. Basis for Allowable Emissions Code: RULE | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: 0.30 lb/ton of kiln feed (dry basis) | 4. Equivalent Allowable Emissions: lb/hour tons/year |
| 5. Method of Compliance: EPA Method 5 | |
| 6. Allowable Emissions Comment (Description of Operating Method): PM emissions from Cement Plant 1 shall not exceed 0.3 pound per ton of kiln feed (dry basis) from cement plant kiln 1. Averaging time per 40 CFR 60.46. | |
| Reference: Permit Nos. 0530021-021-AV and 0530021-011-AV. | |

Allowable Emissions Allowable Emissions **5** of **5**

| | |
|---|--|
| 1. Basis for Allowable Emissions Code: RULE | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: 0.10 lb/ton of kiln feed (dry basis) | 4. Equivalent Allowable Emissions: lb/hour tons/year |
| 5. Method of Compliance: EPA Method 5 | |
| 6. Allowable Emissions Comment (Description of Operating Method): PM emissions from cement plant 1 shall not exceed 0.1 pound per ton kiln feed (dry basis) from clinker cooler 1. Averaging time per 40 CFR 60.46. | |
| Reference Permit Nos. 0530021-021-AV and 0530021-011-AV. | |

CEMEX FACILITIES

EMISSIONS UNIT INFORMATION
 Section [36] of [43]
 EU 052 Finish Mill & Air Heater

POLLUTANT DETAIL INFORMATION
 Page [3] of [6]
 Sulfur Dioxide – SO₂

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**
 (Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

| | | | |
|--|--|---|--|
| 1. Pollutant Emitted: SO₂ | | 2. Total Percent Efficiency of Control: | |
| 3. Potential Emissions: 2.1 lb/hour 2.63 tons/year | | 4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 5. Range of Estimated Fugitive Emissions (as applicable): to tons/year | | | |
| 6. Emission Factor: 142 lb S/1,000 gal, S = 0.05% Reference: AP-42 Table 1.3-1; Permit Nos. 0530021-021-AV and 0530021-018-AC | | 7. Emissions Method Code: 3 | |
| 8.a. Baseline Actual Emissions (if required): tons/year | | 8.b. Baseline 24-month Period: From: To: | |
| 9.a. Projected Actual Emissions (if required): tons/year | | 9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years | |
| 10. Calculation of Emissions: | | | |
| 11. Potential, Fugitive, and Actual Emissions Comment: Represents emissions from the hot gas generator unit. | | | |

CEMEX FACILITIES

EMISSIONS UNIT INFORMATION

Section [36] of [43]
EU 052 Finish Mill & Air Heater

POLLUTANT DETAIL INFORMATION

Page [3] of [6]
Sulfur Dioxide – SO₂

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

| | |
|--|--|
| 1. Basis for Allowable Emissions Code: OTHER | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: 2.1 lb/hr | 4. Equivalent Allowable Emissions: 2.1 lb/hour 2.63 tons/year |
| 5. Method of Compliance: Fuel sulfur limitation of 0.05% | |
| 6. Allowable Emissions Comment (Description of Operating Method): Based on AP-42 Table 1.3-1, Permit No. 0530021-021-AV and Permit No. 0530021-018-AC. | |

Allowable Emissions Allowable Emissions of

| | |
|---|--|
| 1. Basis for Allowable Emissions Code: | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: | 4. Equivalent Allowable Emissions: lb/hour tons/year |
| 5. Method of Compliance: | |
| 6. Allowable Emissions Comment (Description of Operating Method): | |

CEMEX FACILITIES

EMISSIONS UNIT INFORMATION

Section [36] of [43]
EU 052 Finish Mill & Air Heater

POLLUTANT DETAIL INFORMATION

Page [4] of [6]
Nitrogen Oxides – NO_x

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

| | | | |
|--|--|---|--|
| 1. Pollutant Emitted: NO_x | | 2. Total Percent Efficiency of Control: | |
| 3. Potential Emissions: 30.92 lb/hour 38.7 tons/year | | 4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 5. Range of Estimated Fugitive Emissions (as applicable): to tons/year | | | |
| 6. Emission Factor: 13 lb/1,000 gal Reference: AP-42 Table 1.5-1, Permit Nos. 0530021-021-AV and 0530021-018-AC | | 7. Emissions Method Code: 3 | |
| 8.a. Baseline Actual Emissions (if required): tons/year | | 8.b. Baseline 24-month Period: From: To: | |
| 9.a. Projected Actual Emissions (if required): tons/year | | 9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years | |
| 10. Calculation of Emissions: Potential emissions based on the worst-case fuel. | | | |
| 11. Potential, Fugitive, and Actual Emissions Comment: Represents emissions from the hot gas generator unit. | | | |

CEMEX FACILITIES

EMISSIONS UNIT INFORMATION
 Section [36] of [43]
 EU 052 Finish Mill & Air Heater

POLLUTANT DETAIL INFORMATION
 Page [4] of [6]
 Nitrogen Oxides – NO_x

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

| | |
|---|---|
| 1. Basis for Allowable Emissions Code: OTHER | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: 30.92 lb/hr | 4. Equivalent Allowable Emissions: 30.92 lb/hour 38.7 tons/year |
| 5. Method of Compliance: Annual Method 7E | |
| 6. Allowable Emissions Comment (Description of Operating Method): Based on AP-42 Table 1.5-1, Permit Nos. 0530021-021-AV and Permit No. 0530021-018-AC. | |

Allowable Emissions Allowable Emissions __ of __

| | |
|---|--|
| 1. Basis for Allowable Emissions Code: | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: | 4. Equivalent Allowable Emissions: lb/hour tons/year |
| 5. Method of Compliance: | |
| 6. Allowable Emissions Comment (Description of Operating Method): | |

CEMEX FACILITIES

EMISSIONS UNIT INFORMATION
 Section [36] of [43]
 EU 052 Finish Mill & Air Heater

POLLUTANT DETAIL INFORMATION
 Page [5] of [6]
 Carbon Monoxide – CO

**F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION –
 POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS**
 (Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

| | | | |
|---|--|---|--|
| 1. Pollutant Emitted: CO | | 2. Total Percent Efficiency of Control: | |
| 3. Potential Emissions: 17.84 lb/hour 22.3 tons/year | | 4. Synthetically Limited? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 5. Range of Estimated Fugitive Emissions (as applicable): to tons/year | | | |
| 6. Emission Factor: 7.5 lb/1,000 gal Reference: AP-42 Table 1.5-1, Permit Nos. 0530021-021-AV and 0530021-018-AC | | 7. Emissions Method Code: 3 | |
| 8.a. Baseline Actual Emissions (if required): tons/year | | 8.b. Baseline 24-month Period: From: To: | |
| 9.a. Projected Actual Emissions (if required): tons/year | | 9.b. Projected Monitoring Period: <input type="checkbox"/> 5 years <input type="checkbox"/> 10 years | |
| 10. Calculation of Emissions: Potential emissions based on the worst-case fuel. | | | |
| 11. Potential, Fugitive, and Actual Emissions Comment: Represents emissions from the hot gas generator unit. | | | |

CEMEX FACILITIES

EMISSIONS UNIT INFORMATION

Section [36] of [43]
 EU 052 Finish Mill & Air Heater

POLLUTANT DETAIL INFORMATION

Page [5] of [6]
 Carbon Monoxide – CO

**F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION -
 ALLOWABLE EMISSIONS**

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions 1 of 1

| | |
|--|---|
| 1. Basis for Allowable Emissions Code: OTHER | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: 17.84 lb/hr | 4. Equivalent Allowable Emissions: 17.84 lb/hour 22.3 tons/year |
| 5. Method of Compliance: Annual Method 10 | |
| 6. Allowable Emissions Comment (Description of Operating Method): Based on AP-42 Table 1.5-1, Permit Nos. 0530021-021-AV and 0530021-018-AC. | |

Allowable Emissions Allowable Emissions of

| | |
|---|--|
| 1. Basis for Allowable Emissions Code: | 2. Future Effective Date of Allowable Emissions: |
| 3. Allowable Emissions and Units: | 4. Equivalent Allowable Emissions: lb/hour tons/year |
| 5. Method of Compliance: | |
| 6. Allowable Emissions Comment (Description of Operating Method): | |

ATTACHMENT 3
REVISED LIST OF INSIGNIFICANT ACTIVITIES

Attachment 2010-FCB-FTV1 (Rev1)**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 Chapter 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 units 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. Facility-wide particulate matter fugitive emissions from miscellaneous activities, such as truck operations throughout the facility, wind erosion, etc.

Based on Permit Nos. 0530021-021-AV, 0530021-011-AV and 0530021-018-AC.

ATTACHMENT 4
UPDATED CAM APPLICABILITY DETERMINATION CHART

Table 2010-FCB-CAM-1. (Rev. 1) CAM Applicability Analysis and Potential Uncontrolled Emissions, CEMEX Construction Materials Florida, LLC and Central Power and Lime, Brooksville Cement and Power Plants

| EU ID | EU Description | Control Equipment | Emission Limits | Potential Uncontrolled Emissions | | | | | | CAM Applies? (Yes/No) | Comments |
|-------|---|-------------------|-----------------|----------------------------------|-----------------|-----------------|------------|-----|----|--------------------------|--|
| | | | | PM/PM ₁₀ | SO ₂ | NO _x | F (TPY) | SAM | Hg | | |
| 001 | Filter Dust Bin (D-75) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 002 | Fly Ash/Equilibrium Catalyst Bin (D-67) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 004 | Raw Meal Transfer (F-14) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 006 | Two Blend Silos (G-12A & B) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 007 | Kiln Feed Surge Bin (H-15) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 008 | Clinker Receiving/Handling System (S-04) | -- | PM | -- | -- | -- | -- | -- | -- | No | No control equipment per 40 CFR Part 64. Also subject to 40 CFR Part 63 Subpart LLL. |
| 009 | Clinker Cooler Discharge (L-03) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 010 | Clinker Storage Silo and Finish Mill Storage Silo (L-06 & L-07) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 011 | Gypsum & Limestone Bins (L-08) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 012 | Silo Discharge (M-08) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 013 | Finish Mill (N-13) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 014 | Cement Storage Silos Nos. 1 & 2 Discharge System (Q-17) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 015 | Cement Storage Silos Nos. 1 & 2 (Q-15) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 017 | Iron Ore Bin (D-63) | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |

Table 2010-FCB-CAM-1. (Rev. 1) CAM Applicability Analysis and Potential Uncontrolled Emissions, CEMEX Construction Materials Florida, LLC and Central Power and Lime, Brooksville Cement and Power Plants

| EU ID | EU Description | Control Equipment | Emission Limits | Potential Uncontrolled Emissions | | | | | | CAM Applies? (Yes/No) | Comments | |
|-------|---|---|--|----------------------------------|------------------|-----------------|----|-----|----|--------------------------|----------|---|
| | | | | PM/PM ₁₀ | SO ₂ | NO _x | F | SAM | Hg | | | |
| 018 | Power Plant Boiler | Dry Limestone Injection Scrubbing, Baghouse | PM/PM ₁₀ , SO ₂ , NO _x , F, SAM, Hg | -- | 756 ^a | -- | -- | -- | -- | -- | Yes | CAM does not apply for NO _x , F, SAM, or Hg since there is no control equipment for these pollutants. CAM does not apply for PM/PM ₁₀ since the baghouse is subject to 40 CFR 63 Subpart LLL (also controls the Cement Kiln). CAM applies for SO ₂ . |
| 019 | Finish Mill Feed Belt (M-05) | Baghouse | PM | -- | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 020 | Cement Kiln I, In-Line Kiln/Raw Mill and Clinker Cooler I | Baghouse | PM | -- | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 021 | Cement Storage Silo No. 3 Discharge System (Z-17) | Baghouse | PM | -- | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 022 | Cement Storage Silo No. 3 (Z-15) | Baghouse | PM | -- | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 023 | Cement Storage Silo No. 4 & Truck Loadout System | Baghouse | PM | -- | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 024 | Cement Storage Silo and Railcar Loadout System | Baghouses | PM | -- | -- | -- | -- | -- | -- | -- | No | Subject to 40 CFR 63 Subpart LLL for PM. |
| 035 | Limestone Rock Bin (D-38) | Baghouse | PM | 4.10 ^b | -- | -- | -- | -- | -- | -- | No | Uncontrolled PM/PM ₁₀ emissions <100 TPY. |
| 036 | Contaminated Fly Ash & Filter Dust (D-31) | Baghouse | PM | 5.40 ^b | -- | -- | -- | -- | -- | -- | No | Uncontrolled PM/PM ₁₀ emissions <100 TPY. |
| 037 | Limestone Screening System (D-39) | Baghouse | PM | 3.04 ^b | -- | -- | -- | -- | -- | -- | No | Uncontrolled PM/PM ₁₀ emissions <100 TPY. |
| 038 | Limestone Fines Storage Bin (D-13) | Baghouse | PM | 3.04 ^b | -- | -- | -- | -- | -- | -- | No | Uncontrolled PM/PM ₁₀ emissions <100 TPY. Also subject to 40 CFR Part 63 Subpart LLL. |
| 039 | Lime Dust Storage Bin (Z-31) | Baghouse | PM | 4.56 ^b | -- | -- | -- | -- | -- | -- | No | Uncontrolled PM/PM ₁₀ emissions <100 TPY. Also subject to 40 CFR Part 63 Subpart LLL. |

Table 2010-FCB-CAM-1. (Rev. 1) CAM Applicability Analysis and Potential Uncontrolled Emissions, CEMEX Construction Materials Florida, LLC and Central Power and Lime, Brooksville Cement and Power Plants

| EU ID | EU Description | Control Equipment | Emission Limits | Potential Uncontrolled Emissions | | | | | | CAM Applies? (Yes/No) | Comments |
|-------|--|-------------------|-----------------|----------------------------------|-----------------|-----------------|----|-----|----|--------------------------|--|
| | | | | PM/PM ₁₀ | SO ₂ | NO _x | F | SAM | Hg | | |
| 042 | Coal Receiving, Handling, and Transfer Activities | -- | PM | -- | -- | -- | -- | -- | -- | No | No control equipment per 40 CFR Part 64. |
| 044 | Kiln No.2/preheater/Precalciner /Clinker Cooler/Air Heater | Baghouse | PM | -- | -- | -- | -- | -- | -- | No | Exempted from CAM per 40CFR 64.2(b)(vi) because COM(Continuous Opacity Monitor) is required by NSPS and NESHAP |
| 045 | Filter Dust Bin | Baghouse | PM | 2.63 ^b | -- | -- | -- | -- | -- | No | Pre-control device potential to emit under 100 TPY |
| 046 | Raw Meal Transport | Baghouse | PM | 2.43 ^b | -- | -- | -- | -- | -- | Yes | |
| 047 | Kiln Feed Transport | Baghouse | PM | 8.33 ^b | -- | -- | -- | -- | -- | Yes | |
| 048 | Clinker Transport | Baghouse | PM | 0.96 ^b | -- | -- | -- | -- | -- | Yes | |
| 050 | Clinker Storage | Baghouse | PM | 4.34 ^b | -- | -- | -- | -- | -- | Yes | |
| 051 | Finish Mill Collecting Bin | Baghouse | PM | 2.51 ^b | -- | -- | -- | -- | -- | No | Pre-control device potential to emit under 100 TPY |
| 052 | Finish Mill | Baghouse | PM | 1.20 ^a | -- | -- | -- | -- | -- | No | Pre-control device potential to emit under 100 TPY |
| 054 | Bucket Elevator | Baghouse | PM | 2.61 ^b | -- | -- | -- | -- | -- | Yes | |
| 057 | Cement Transport | Baghouse | PM | 1.92 ^b | -- | -- | -- | -- | -- | Yes | |
| 058 | Cement Loadout Bin | Baghouse | PM | 4.17 ^b | -- | -- | -- | -- | -- | Yes | |
| 059 | Cement Loadout Bin | Baghouse | PM | 3.45 ^b | -- | -- | -- | -- | -- | Yes | |
| 060 | Coal Mill | Baghouse | PM | 8.54 ^b | -- | -- | -- | -- | -- | No | Pre-control device potential to emit under 100 TPY |
| 061 | Fine Coal Bin | Baghouse | PM | 0.13 ^b | -- | -- | -- | -- | -- | No | Pre-control device potential to emit under 100 TPY |
| 062 | Packing Plant | Baghouse | PM | 5.14 ^b | -- | -- | -- | -- | -- | No | Pre-control device potential to emit under 100 TPY |

^a (color red) Based on Stack test data. Refer to application form for testing / reporting date (within five years).

^b (color yellow) Based on allowable / potential emission rate requested in the application. No stack test data available; VE test instead. Refer to application form for testing / reporting date (within five years).