

P.E. CERTIFICATION STATEMENT

PERMITTEE

CEMEX Construction Materials, LLC
10311 Cement Plant Road
Brooksville, Florida 34601

Final Permit No. 0530021-036-AC
Revisions to Stack Testing Requirements
Brooksville South Cement Plant
Hernando County, Florida


PROJECT DESCRIPTION

The permittee requests a revision to Permit No. 0530021-033-AC/PSD-FL-351D to show the stack testing requirements for mercury (Hg) per the requirements of 40 CFR 63 Subpart LLL.

The compliance requirements for mercury emissions are found in 40 CFR 63.1349(b)(5), which includes the mercury standard, test method and conditions. There is no reference to frequency of mercury stack testing after initial performance testing in 40 CFR 63.1349. 40 CFR 63.1349(c) discusses performance tests under paragraphs (b)(1) and (b)(2) to be repeated every five years, except for opacity and as provided in (e) of the section. 40 CFR 63.1349(b)(1) refers to particulate matter and in 40 CFR 63.1349(b)(2) to opacity. Paragraph 40 CFR 63.1349(e) describes the requirements for dioxin furan emissions performance tests. The frequency of compliance tests is found in Chapter 62-297.310(7)(a)3, F.A.C. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Title V permits are renewed every five years and the mercury stack testing frequency in the permit is set at every five years; compliance tests are to be conducted prior to obtaining a renewed operation permit. In addition, a mercury CEMS may be installed in the future with the new NESHAP requirements effective in 2013. The permit clarifies the testing requirements by adding that the RATA for the CEMS using 40 CFR 60, Appendix F, and the applicable Performance Specification may be used to satisfy the stack testing requirement for any pollutant.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The Department's full review of the project and rationale for issuing the final permit is provided in the Technical Evaluation and Preliminary Determination.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).


S. Christine DeVore, P.E. (Date)
Registration Number 63119

12-14-11

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF PERMITTING AND COMPLIANCE