



# Florida Department of Environmental Protection

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Charlie Crist  
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Jeff Kottkamp  
Lt. Governor  
Michael W. Sole  
Secretary

July 15, 2009

*Electronically Sent – Received Receipt Requested.*

James S. Daniel, Plant Manager - [jdaniel@cemexusa.com](mailto:jdaniel@cemexusa.com)  
South Brooksville Cement Plant  
Florida Crushed Stone, d.b.a. CEMEX Construction Materials Florida, LLC  
10311 Cement Plant Road  
Brooksville, Florida 32669

Re: DEP File Nos. 0530021-021-AV  
South Brooksville Cement Plant Line 2  
Revision of Title V Application

Dear Mr. Daniel:

On April 20, the Department sent an incompleteness letter regarding matters related to the “as-built” configuration of the construction permit; the Department received a response to this letter on June 22. On June 2, 2009 the Department sent you an incompleteness letter regarding the Title V Permit Revision Application to incorporate Line 2. On July 13, the Department sent another incompleteness letter regarding matters related to the “as-built” configuration of the construction permit, we are waiting for the response to this letter.

Your application for the Title V permit revision remains incomplete until a response to the Department’s letter of July 13, 2009 is received. In addition to what is included in the above letter, the following is needed:

**Compliance Assurance Monitoring (CAM) Plan:** Please submit an applicability review for a CAM plan for the kiln/cooler/raw mill and the finish mill baghouse systems and for any other unit that will have uncontrolled emissions greater than 100 tons per year. It appears that both (kiln and finish mill) have uncontrolled emissions greater than 100 tons per year. Please refer to CAM applicability, 40 CFR 64, for each control device for Line 2.

**Compliance Plan (CP):** A CP needs to be submitted for every unit that has not been tested. If additional testing would be required by the “as-built” configuration for emissions unit (E.U.) 052 and the finish mill process heater in the new modified permit, then a CP is needed for these units.

**Concurrent Processing of Title V Revision and Air Construction Permit Modification:** The Title V permit application indicates a request to do concurrent processing. The Department believes that the concurrent processing of these two permitting actions is not practical at this time due to the nature of the three modifications of the construction permit requested along with the installation of the tire injection mechanism (TIM). Therefore, the Department asks CEMEX to withdraw the request for the concurrent processing of the Title V and the Construction Permit.

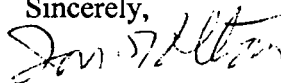
After the construction permit has been issued, the Department will continue with the incorporation of Cement Line 2 to the Title V permit. The construction permit expiration date will be extended to insure that the TIM construction will be completed within a reasonable time. Cement Line 2 will continue to operate under the new modified construction permit.

Also, it is our understanding that Mr. Lucarelli, the Professional Engineer of record who sealed the Title V revision application, is no longer with CEMEX. Should any of the information contained in the Title V application need to change as a result of your responses to our July 13 request for additional information regarding the "as-built" construction permit revision, that information will need to be recertified by a Professional Engineer. Please advise our office as to the identity of the professional Engineer who will be assuming the certification responsibilities associated with the incomplete Title V permit revision application and provide replacement certification statements, as necessary.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department air construction or Title V air operation permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please advise the professional engineer to make sure he/she uses the correct seal in compliance with the applicable requirements of the Florida Board of Professional Engineers. Permit applicants are advised that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days.

If you have any questions, please contact me at (850) 921-9531.

Sincerely,



Jon Holtom, P.E., CPM  
Title V Program Administrator  
Bureau of Air Regulation

JKH/th

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Events Scheduled

79 of 90

AIRS ID  Site Name

Permit #  Type/Subtype  /  Received

Project #  Project Name

> Awaiting Additional Information: Received

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Awaiting Additional Information	12/11/2008	45	01/25/2009		Received	12/23/2008
Completeness Review	12/23/2008	30	01/22/2009		Incomplete	01/22/2009
RESET CLOCK	01/22/2009	1	01/23/2009		Done	01/22/2009
Awaiting Additional Information	01/22/2009	45	03/08/2009		Received	04/08/2009
Completeness Review	04/08/2009	30	05/08/2009		Incomplete	05/06/2009
RESET CLOCK	05/06/2009	1	05/07/2009		Done	05/06/2009
Awaiting Additional Information	05/06/2009	45	06/20/2009		Received	06/09/2009
Completeness Review	06/09/2009	30	07/09/2009		Incomplete	07/02/2009
RESET CLOCK	07/02/2009	1	07/03/2009		Done	07/02/2009
Awaiting Additional Information	07/02/2009	45	08/16/2009		Received	07/29/2009
Completeness Review	07/29/2009	30	08/28/2009	18	Pending	