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KA307-11-18
February 22, 2012

***Via UPS Air
and E-mail***

Christy Devore
Florida Department of Environmental Protection
Ambient Monitoring Section
2600 Blair Stone Road MS 5510
Tallahassee, FL 32399-2400

***Subject: CEMEX Construction Materials Florida, LLC
Brooksville South Portland Cement Plant
Facility ID 0530021
Application for AC/AV permit for Kiln No. 1 and Kiln No. 2***

Dear Christy:

Attached are four copies of the Application Information and Facility Information sections of an application for an Air Construction permit and a concurrently processed Title V permit for the CEMEX Construction Materials Florida, LLC (CEMEX) Brooksville South Portland Cement Plant. The application is for the re-permitting of Kiln No. 1, Kiln No. 2, the coal yard and associated emission units independent of the CPL Power Plant. As you are aware, Florida Power Development, LLC (FPD) was recently issued Permit No. 0530380-001-AC to convert the CPL fossil fuel fired power plant to a biomass fired power plant. The permit issued to FPD re-permits the CPL plant to a stand-alone biomass fired power plant. The attached application for a stand-alone AC/AV permit for the CEMEX Brooksville South Cement Plant.

The attached Application Information and Facility Information sections of the AC/AV permit application include the signed Responsible Official certification and the signed and sealed PE certification for the application. As I discussed with you during our telephone conversation of February 22, 2012, the remainder of the application, covering the 35 emission units comprising the CEMEX Brooksville South Cement Plant, will be transmitted to your office electronically. We will also transmit electronically a marked up copy of the recent Title V permit (0530021-029-AV) issued for the Brooksville South facility (including the CPL Power Plant) with references to the power plant deleted. Additionally, minor amendments to a limited number of permit conditions and corrections to the permit are noted in our mark up of the permit.

Christy Devore, FDEP
Re: Facility ID 0530021
February 22, 2012

In the mark up of the permit, the one matter that I did not spend much time on was assuring the consistency between the requirements of the 2006 and 2010 NESHAP for Portland Cement Plants (40 CFR 63, Subpart LLL). I will leave that task to you.

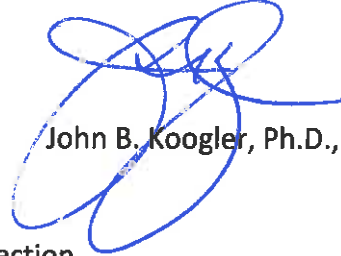
Regarding changes in the permit, CEMEX is proposing the following and would appreciate the opportunity to discuss these with you during your review of the application.

1. There is a Facility-wide Condition requiring PM10 ambient air quality monitoring. CEMEX is of the opinion that the PM10 monitoring network has served its purpose; i.e., it has consistently shown that the operations of the cement plant, power plant and associated activities do not cause, or contribute to, a violation of the PM10 National Ambient Air Quality Standard. Because of this, and following the precedent established with the ambient monitoring network initially required of Suwannee American Cement, CEMEX is requesting that the permit condition requiring the PM10 monitoring be deleted.
2. CEMEX is requesting that natural gas and pet coke be added as fuels for Kiln No. 1. These fuels are presently permitted for Kiln No. 2 and no change in the emissions from Kiln No. 1 are expected if these fuels are used in Kiln No. 1 also.
3. It is requested that the annual operating times of Emission Units 021, 022 and 023 be increased from 7884 hours per year to 8760 hours per year. This request is made simply to reduce recordkeeping and reporting efforts. The potential increase in emissions brought on by the increased hours of operation is approximately 0.9 tons per year. This increase is more than offset by a reduction in the facility-wide coal throughput (EU-042).
4. It is requested that the operating time of EU-050 be increased from 7500 hours per year to 8760 hours per year. The reason for this request is that EU-050 includes the clinker silo that receives clinker from Kiln No. 2. Increasing the hours of operation of this silo to be consistent with the operating time of Kiln No. 2 is the reason for this request. There will be no increase in potential PM emissions as the annual PM/PM10 emission rates for this Emission Unit are presently based on 8760 hours per year operating time.

Christy Devore, FDEP
Re: Facility ID 0530021
February 22, 2012

If there are questions or comments with the application, please feel free to contact me either by phone or email. As I've stated, CEMEX is available at your convenience to discuss amendments requested in this application.

Very truly yours,



John B. Koogler, Ph.D., P.E.

JBK/kh

Attachment: Application Information Section
Facility Information Section

cc: Jeff Koerner, FDEP
Syed Arif, FDEP
Lillian Deprimo, CEMEX
Jim Daniel, CEMEX
George Townsend, CEMEX
Larry Curtin, Holland & Knight