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Via EMAIL

Mr. Jeff Koerner, Program Administrator
Florida Department of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road MS 5500
Tallahassee, Florida 32399-2400

SUBJECT: CEMEX Construction Materials Florida, LLC – Brooksville South (Facility ID 0530021)
Brooksville, Hernando County, Florida
EU 020: Replacement of Existing Water Spray System for Line 1 Kiln

Dear Mr. Koerner:

CEMEX Construction Materials Florida, LLC (“CEMEX”) requests approval to replace Brooksville South facility’s Line 1 Kiln’s (EU 020) existing water spray system with CEMEX Brooksville North facility’s (Facility ID 0530010) Line 2 Kiln’s (EU 014) evaporative cooling system spray tower. Koogler and Associates, Inc. (“Koogler”) believes that the proposed project would be considered a “like-kind” replacement and that the facility would be eligible to make this operational change without a permit revision.

BACKGROUND

CEMEX Brooksville North was authorized to install an evaporative cooling system spray tower for Kiln No. 2 under Permit Nos. 0530010-038-AC and 0530010-046-AC. The CEMEX Brooksville North has been shut down since approximately December 2008.

Permit No. 0530021-022-AC authorizes the installation of a water spray / injection system on the downcomer of the Kiln 1 Preheater Tower at the CEMEX Brooksville South Facility. The existing spray system at the CEMEX Brooksville South facility was installed under Permit No. 0530021-022-AC to efficiently and effectively cool the gases leaving the preheater of Kiln No. 1 from approximately 750°F to approximately 400-450°F, thus preventing the formation of dioxins and/or furans.

PROJECT DESCRIPTION

CEMEX would like to replace the existing water spray system at CEMEX Brooksville South with the evaporative cooling system spray tower from CEMEX Brooksville North. It is also requested that the Department allows this operational change to occur without revising the current Title V air permit, provided the criteria in Rule 62-213.410(2) are met.

The replacement of the existing system will serve exactly the same function, but more efficiently and effectively. The proposed replacement is functionally a like-kind replacement of something that is already permitted. In addition, it is expected that the proposed project will have no effect whatsoever on kiln feed rate, kiln production rate and/or for the gas flow rate from the kiln/preheater system; therefore, this project would not be considered a “modification” or new “construction.”

RULE ANALYSIS

Rule 62-213.410(2), F.A.C. states that a permitted source may implement operating changes after the source submits any forms required by any applicable requirement and provides the Department and EPA with at least 7 days written notice prior to implementation. This project could be considered an operating change but does not constitute a modification and does not otherwise subject the source to a requirement for permit revision pursuant to Rule 62-213.400, F.A.C. This approach is consistent with Rules 62-210.200(206) and 62-213.400(2), F.A.C.

Since an increase in emissions is not expected, the project could be considered an operating change, but not a modification. Furthermore, the project does not appear to meet any of the requirements for a permit revision. Therefore, it appears that this project would meet the requirements of Rule 62-213.410(2), F.A.C., which would allow this proposed project to be implemented without a permit revision, provided that applicable forms are submitted and notification are provided to the EPA and Department within seven day prior to implementation of the like-kind replacement.

CONCLUSION

CEMEX Brooksville South would like to replace the existing water spray system for EU 020 with the evaporative cooling spray tower permitted for CEMEX Brooksville North. This would be a like-kind replacement in function where the kiln feed rate, kiln production rate and/or for the gas flow rate from the kiln/preheater system are expected to remain unchanged. In addition, it is not expected that the emissions will increase as a result of this project.

The project appears to meet the criteria for an operational change without a permit revision, as described in Rule 62-213.410(2), F.A.C., provided proper forms and written notification are submitted at least 7 days prior to implementation

Please provide written confirmation if the Department agrees with Koogler’s determination. Otherwise, please advise on how to proceed with this project.

If you have any questions, please feel free to contact me at (352) 377-5822 x 13 or vsgro@kooglerassociates.com.

Best Regards,



Veronica N. Sgro, P.E.
KOOGLER AND ASSOCIATES, INC.

Cc: James S. Daniel – CEMEX Construction Materials, LLC (via EMAIL)
George Townsend – CEMEX Construction Materials, LLC (via EMAIL)
David Read – Florida Department of Environmental Protection (via EMAIL)