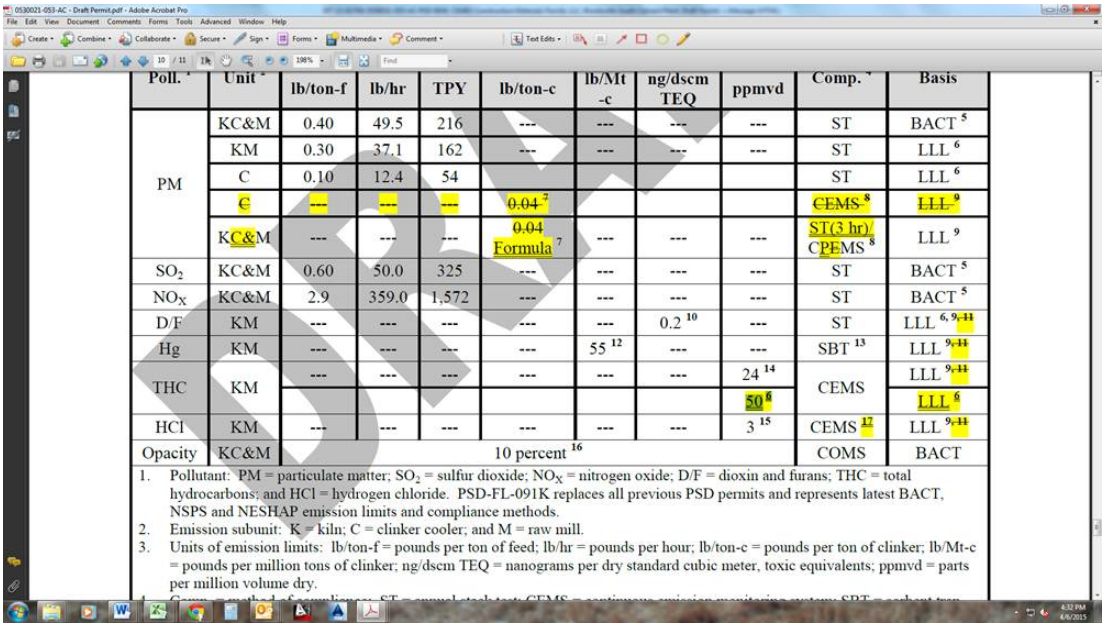
From: Dr. Max Lee
To: Subramaniam, Pawan
Cc: Linero, Alvaro; gtownsend@cemexusa.com; jdaniel@cemexusa.com
Subject: 307-15-02 307-15-03 FW: 0530021-053-AC-PSD-91M, CEMEX Construction Materials Florida, LLC, Brooksville South Cement Plant, Draft Permit
Date: Monday, April 06, 2015 4:48:02 PM
Attachments: image001.png
0530021-053-AC - Written Notice_signed.pdf
0530021-053-AC - Public Notice.docx

Hi Pawan,

These two draft permits look, in general, very well done. Thank you for all your work. I noticed a couple of items on the two permits that I want to get cleared up.

0530021-053-AC – Kiln 1

The primary issue of concern is on page 10 of 11 where the revisions proposed for AC permit 043-AC state NESHAP THC limit must be compiled with (50 ppmvd by CEMS until 9/9/15). Screenshot below.



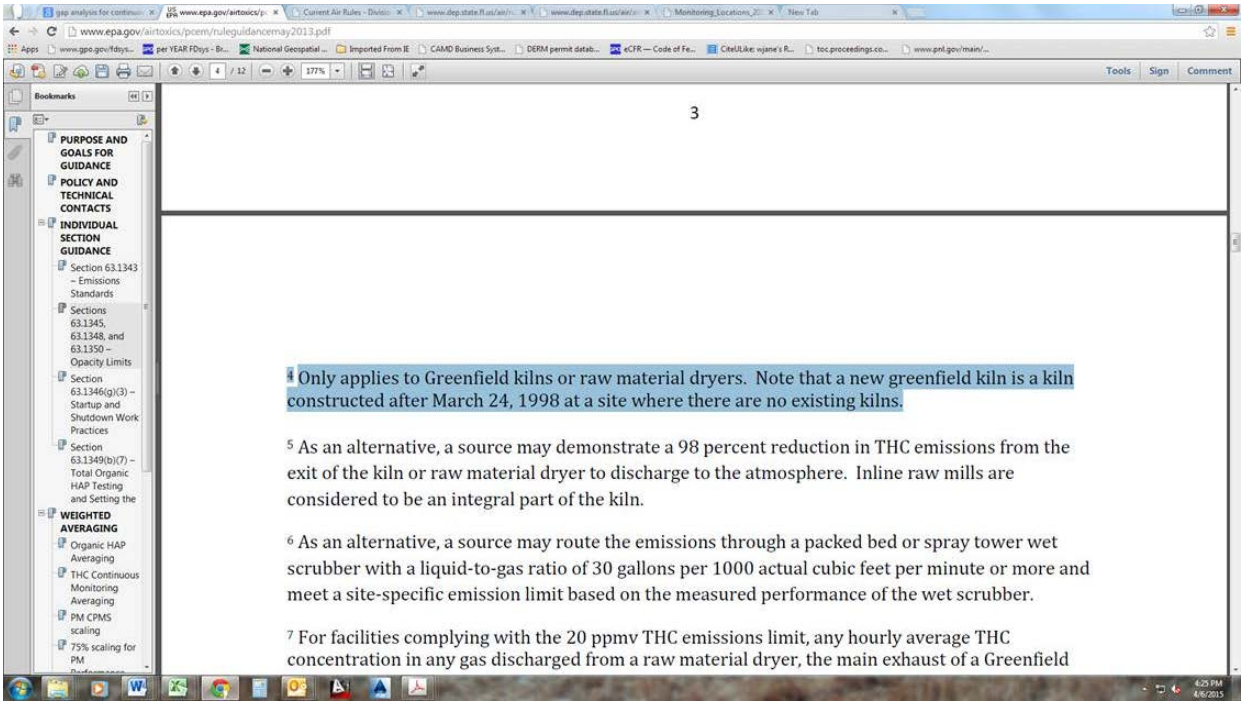
Poll. [1]	Unit [2]	lb/ton-f	lb/hr	TPY	lb/ton-c	lb/Mt-c	ng/dscm TEQ	ppmvd	Comp. [3]	Basis
PM	KC&M	0.40	49.5	216	---	---	---	---	ST	BACT [5]
	KM	0.30	37.1	162	---	---	---	---	ST	LLL [6]
	C	0.10	12.4	54					ST	LLL [6]
	~~C~~	~~---~~	~~---~~	~~---~~	~~0.04 [7]~~				~~CEMS [8]~~	~~LLL [9]~~
	KC&M	---	---	---	0.04 Formula [7]	---	---	---	ST(3 hr)/ CPEMS [8]	LLL [9]
SO_2	KC&M	0.60	50.0	325	---	---	---	---	ST	BACT [5]
NO_X	KC&M	2.9	359.0	1,572	---	---	---	---	ST	BACT [5]
D/F	KM	---	---	---	---	---	0.2 [10]	---	ST	LLL [6, ~~9, 11~~]
Hg	KM	---	---	---	---	55 [12]	---	---	SBT [13]	LLL [~~9, 11~~]
THC	KM	---	---	---	---	---	---	24 [14]	CEMS	LLL [~~9, 11~~]
								50 [6]		LLL [6]
HCl	KM	---	---	---	---	---	---	3 [15]	CEMS [12]	LLL [~~9, 11~~]
Opacity	KC&M	10 percent [16]							COMS	BACT

1. Pollutant: PM = particulate matter; SO_2 = sulfur dioxide; NO_X = nitrogen oxide; D/F = dioxin and furans; THC = total hydrocarbons; and HCl = hydrogen chloride. PSD-FL-091K replaces all previous PSD permits and represents latest BACT, NSPS and NESHAP emission limits and compliance methods.
2. Emission subunit: K = kiln; C = clinker cooler; and M = raw mill.
3. Units of emission limits: lb/ton-f = pounds per ton of feed; lb/hr = pounds per hour; lb/ton-c = pounds per ton of clinker; lb/Mt-c = pounds per million tons of clinker; ng/dscm TEQ = nanograms per dry standard cubic meter, toxic equivalents; ppmvd = parts per million volume dry.

Similar to the Miami Cemex kiln which is not subject to this NESHAP limit, that limit applies only to new (greenfield kilns) built after March 24, 1998.

There is a good guidance on this issue at http://www.epa.gov/airtoxics/pcem/ruleguidancemay2013.pdf that can be used to track back to the 1999 initial NESHAP rule.

As well, I have screen shot the document with a highlight below.



3

[4] Only applies to Greenfield kilns or raw material dryers. Note that a new greenfield kiln is a kiln constructed after March 24, 1998 at a site where there are no existing kilns.

[5] As an alternative, a source may demonstrate a 98 percent reduction in THC emissions from the exit of the kiln or raw material dryer to discharge to the atmosphere. Inline raw mills are considered to be an integral part of the kiln.

[6] As an alternative, a source may route the emissions through a packed bed or spray tower wet scrubber with a liquid-to-gas ratio of 30 gallons per 1000 actual cubic feet per minute or more and meet a site-specific emission limit based on the measured performance of the wet scrubber.

[7] For facilities complying with the 20 ppmv THC emissions limit, any hourly average THC concentration in any gas discharged from a raw material dryer, the main exhaust of a Greenfield

So please confirm for me by email response that the 50 ppmvd limit and related monitoring prior to 9/9/15 is not required and revise the proposed 043-AC permit revisions.

Thank you for revising the PM limit to correctly state the equation 1 method must be used to determine the PM NESHAP limit since the cooler vents into the kiln.

0530021-052-AC – Kiln 2

Page 7 of 12 and 10 of 12. The permitting note does not include that the kiln unit or the dry sorbent injection system is subject to NSPS. Is that intentional?

Best,

Max

From: Scearce, Lynn [mailto:Lynn.Scearce@dep.state.fl.us]
Sent: Wednesday, April 01, 2015 4:06 PM
To: jdaniel@cemexusa.com
Cc: gtownsend@cemexusa.com; Dr. Max Lee; Boatwright, Kelley M.; Shepherd.Lorinda@epa.gov; Ceron, Heather; Subramaniam, Pawan; Read, David; Scearce, Lynn
Subject: 0530021-053-AC-PSD-91M, CEMEX Construction Materials Florida, LLC, Brooksville South Cement Plant, Draft Permit

Dear Mr. Daniel:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and reply back verifying receipt of the documents provided in the links.

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify.

Owner/Company Name: CEMEX CONSTRUCTION MATERIALS FLORIDA,LLC
Facility Name: CEMEX BROOKSVILLE SOUTH CEMENT PLANT
Project Number: 0530021-053-AC-PSD-91M
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: HERNANDO

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0530021.053.AC.D_pdf.zip.

If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Sincerely,

Lynn Scearce

Office **o**f **P**ermitting **a**nd **C**ompliance **(OPC)**
Division **o**f **A**ir **R**esource **M**anagement – **DEP**
2600 **B**lair **S**tone **R**oad, **M**ail **S**top **5505**
Phone: **8**50-717-**9**025
DEP Information Portal: Click to follow link.

DEP Information Portal
Facility and Document
SEARCH

Customer
Service
Survey