



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

September 2, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul Mazak, President
Florida Mining Corporation
7000 SR 50
Webster, Florida 33597

Re: Second Request for Additional Information
DEP File No. 1190040-001-AC (PSD-FL-356)
Proposed Portland Cement Plant in Sumter County, Florida

Dear Mr. Mazak:

On August 4, 2005 the Department received the Florida Mining Corporation's (FMC) response to our request for additional information dated June 24, 2005. Based on the response received, we require additional information below.

Pursuant to Rules 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Our Issue 1 from our previous request is repeated as follows:

"There does not appear to be any preliminary and original engineering of the kind typically associated with a cement project that has progressed to the stage where an air permit application is submitted. Typically at this point in cement project development, there is preliminary work by an engineering and design firm if not by the actual potential suppliers such as Polysius, F.L. Smidth, KHD Humboldt Wedag, CLE, etc. Please provide design information and engineering drawings."

No evidence of preliminary original engineering work by equipment suppliers (or by companies that prepare designs suitable for competitive bidding by suppliers) was provided in the response. There are numerous companies capable of supplying a moderate level of such engineering without predetermining the ultimate supplier.

Please provide the information as originally requested. [62-4.070, F.A.C]

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2. The professional engineer who sealed the application certified on page 6 that he had "examined" the engineering features and not that he had "designed" them. Please provide the name(s) of the person(s) or firm who "designed" the limited or underlying engineering features that characterize the application. These include stack heights, temperatures, layout, raw mill and finish mill capacities, heat input, drying requirements, to name a few.

[62-4.070, F.A.C]

3. Our Issue 2 from our previous request is repeated as follows:

"The proposed project is virtually identical in layout, production capacity, and emission characteristics to another proposed project in Florida. Please confirm that the same emissions and assumed design make sense for the area and raw materials available where the project is planned."

The original question was not aimed at raw material reserves or product demand as much as it was on the chemical characteristics of the raw materials and the ability to comply with the requested emission limits for a given raw mix and plant location.

For example, an expulsion test is usually conducted to determine the rate at which volatile material evolves throughout the temperature range of pyroprocessing. During such tests, potential problems such as volatile compounds, free and fixed moisture, organic carbon, and organic nitrogen are revealed. The typical projects in Florida were designed prior to submittal of an air construction permit to reasonably account for raw material characteristics.

Adopting a layout (or at least key features) similar if not identical to another or without extensive verification can cause unforeseen problems on emissions.

The Holcim Florence plant exceeded its VOC emissions by an order of magnitude after failing to properly consider keragen in their raw material. Florida Rock did not initially anticipate the effects of imported raw material such as mill scale and experienced high but correctable VOC emissions. Suwannee American encountered unexpected sulfur deposits notwithstanding the statement in the response to the Issue 8 that "sulfur in the raw material is assumed to be low, based on data from the USGS".

In nearby Hernando County, there are deposits that are characterized by high chloride levels (not typical for Florida limestone) that required Rinker to consider inclusion of a bypass. In Miami-Dade County, the mix is more difficult because of the existence of quartzite in their sand (source of silica).

In summary, to adopt a similar layout to, or incorporate seemingly identical components from, another facility requires, at a minimum, adoption of others' engineering, re-engineering, and verification of similar raw materials and environmental conditions.

In light of the foregoing, please provide the information as requested. Also provide the laboratory results of expulsion and burnability tests. [62-4.070, F.A.C]

4. In the Department's original request for additional information (Issue 6), the Department asked for a description of the primary fuel firing scenarios and an estimate of pollutant emissions under each scenario. In the response, FMC indicated that "most pollutant emissions are assumed as independent of fuels and heat input ratios". FMC provided some generalities regarding NO_x, CO, and VOC emissions. Please provide the pollutant emissions

estimates for the different fuel firing scenarios as originally requested, at least for NO_x and CO. [62-4.070, F.A.C]

5. The cost effectiveness analyses to achieve 1.5 and 1.0 lb NO_x/ton clinker were provided as requested. In the response to Issue 8, FMC expressed that the effects on handling and storage, and ammonia slip from increased quantities of ammonia reagent necessary to achieve the lower levels of control were of greater concern to the company than the cost effectiveness. Please quantify the reagent required for each level of control. Describe how this would affect storage and handling and levels of ammonia slip. [62-4.070, F.A.C]
6. The Department's original request for additional information contained items related to design considerations for NO_x and CO control. Regarding Issues 11, 12, and 13 FMC stated that return in the kiln, flame cooling, and ductwork length will be considered in the final plant design. Please provide the information originally requested regarding these items. [62-4.070, F.A.C]
7. Regarding Issue 24, the response indicates that "detailed information was provided on the nature and extent of, all general commercial, residential, industrial and other growth which has occurred since August 7, 1977 in Sumter County." Please indicate where in the original application this information was provided. Note that the site almost abuts Lake County. As previously advised, we consider effects to include contiguous Counties. [62-212.400, F.A.C]
8. Please redo the PM₁₀ PSD Class II increment and NAAQS modeling using 25 meter spacing along the fence line.
9. Please provide an oversized hard copy (2 ft by 3ft) Auto Cad plot plan of the entire facility including all projected sources, structures, and the fence line. Place a legend and a grid in UTM coordinates in meters on the plan. In addition send us the Auto Cad files by e-mail.
10. Please explain why the initial horizontal and initial vertical dimensions for the rock quarry source were chosen to be 30m.
11. Based on our review of the revised plot plan in Attachment 6, the source BAG was incorrectly located in the PM₁₀ modeling files. According to the plot plan this source should be located at about 404278, 3162075. Instead it was located at 404170.22, 3161964.75. Please address this discrepancy, and remodel if necessary.
12. Explain why volume sources were chosen to characterize road emissions sources instead of area sources.
13. The road source information provided shows no differentiation of vehicles such as employee vehicles, front end loaders and other kinds of trucks. Please provide this information or verify that the information presented is the most representative of the projected vehicle traffic. In addition, are there any unpaved road sources, which should be including the fugitive PM impacts modeling?
14. Please discuss what frequency of sweeping would be necessary to maintain a surface silt loading content of 0.14 g/m².
15. On page 20 of the August 3 response, it is stated that screening values for deposition for sulfur and nitrogen in the PSD Class II area near the facility were based on CALPUFF

modeling. These predicted results in the Class II area should be based on ISC deposition modeling.

16. Please verify that the most conservative stack parameters of the proposed fuel mixes, i.e. velocity and temperature were used for modeling each pollutant.

We will forward any comments received from other agencies as soon as we receive them. Rule 62-4.050(3), F.A.C. requires that all applications for a Department 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. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call Cindy Mulkey at 850/921-8968 or me at 850/921-9523. Matters regarding fugitive particulate modeling issues should be directed to Cleve Holladay at 850/921-8986. Other modeling issues should be directed to Ms. Deborah Nelson at 850/921-9537.

Sincerely,



A.A. Linero, Program Administrator
Bureau of Air Regulation
New Source Review Section

AAAL/cm

cc: Paul Mazak, FMC*
Jim Little, EPA
John Bunyak, NPS
Jim Cleary, DEP SWD
Joey Chandler, Chair Sumter County Board of County Commissioners
Steve Cullen, Koogler and Associates
Robbie Rogers, Sumter County Planning and Development
Ed & Wanda Gallagher
Joe Horton, SAC

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Mr Paul Mazak, President
 Florida Mining Corp.
 7000 SR 50
 Webster, FL 33597

2. Article Number

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Sent To *Paul Mazak, President Fla Mining Corp.*
 Street, Apt. No. or PO Box No. *7000 SR50*
 City, State, ZIP+4 *Webster, FL 33597*

PS Form 3800, June 2002 See Reverse for Instructions