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AIR REGULATION

June 25, 2010

Trina Vielhauer
Air Resources Bureau Chief
Florida Department of Environmental Protection
P.O. Box 3070
Tallahassee, FL 32315-3070

Re: **Extension Request for Sumter Cement Air Permit**
Air Permit No. PSD-FL-358
DEP File No. 1190041-001-AC

Dear Ms. Vielhauer:

Thank you again for you and your staffs time to meet and discuss our Sumter Cement Project on May 21st. As Marty Fallon, Chief Executive Officer for Sumter Cement as well as Vice-President for Business Development for Votorantim Cimentos North America (VCNA), outlined and I am sure everyone is quite aware; the entire economic landscape for the United States has shifted dramatically during the past few years. Unfortunately Florida has felt the brunt of this and with this the construction industry has been crippled due to this unprecedented economic downturn.

As discussed, the demand for cement consumption in the state of Florida has fallen from peak numbers of approximately 12 million short tons of cement down to numbers below 4 million short tons. This has fundamentally changed the supply and demand dynamics for the cement industry in a State that in 2005 imported approximately 6 million short tons of cement. During this period of 2004 to 2005 Sumter Cement Company began its permitting Process with the Florida Department of Environmental Protection (DEP). Economist during this period showed continued growth and demand for cement and building materials for the Country and State. Details for this information are attached in **Attachment 1**.

As these unique and unpredictable conditions started to unfold in 2008 and 2009 it became clear that it was not prudent to complete the Sumter Cement Plant and its additional 1.5 million short tons of cement capacity online during its original outlined schedule. Thus the schedule has been delayed until economic conditions and cement demand return. Sumter Cement is still committed to the project and confident that Florida will resume its growth both economically and in population. Sumter Cement has committed and continues to commit great resources to this project. To date Sumter Cement has purchased over 85% of the process equipment for the plant with all of this equipment fabricated and currently in storage at various points of export all over the world. Portions of the equipment have been delivered to the Sumter Cement site in Center Hill, Florida where they are currently being stored in preparation for the Project to resume.

The following outlines a chronological timeline of the various milestones for Sumter Cement:

- Feb 2005 Initial Site Investigation
- May 2005 Quarry Verification Studies Completed
- Jul 2005 Initial Environmental Studies Completed
- Sep 2005 Air Permit Application Submitted
- Jan 2006 Conditional Use Permit (CUP) received from City Council
- Feb 2006 Appeal filed to CUP
Air Permit Received
- Jul 2006 County Judge denies CUP from City Council
- Oct 2006 Dragline Purchased
- Dec 2006 Rezoning and CUP received from City Council
- May 2007 Contract for Primary Equipment Supplier Finalized
- May 2007 Ceremonial Groundbreaking
- June 2007 to May 2008 Detailed Engineering Completed
- June 2007 to August 2009 Equipment Fabrication
- September 2008 Dragline Completed
- 2009 to current Structural Steel and portions of Equipment arrive at Sumter Site

Sumter Cement has currently invested over US \$50 million dollars in Process Equipment for the Project. Each piece specifically engineered, designed and fabricated for the Sumter Project. Details for the dates of execution for the main equipment supplier Contract are included in **Attachment 2**.

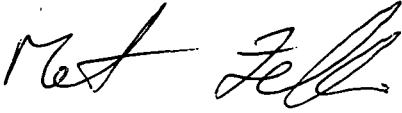
Currently Sumter Cement has received portions of the process equipment to the Sumter Project site in Center Hill, Florida. Shipping Records for shipments received as recently as June 2010 are included in **Attachment 3**. Additionally pictures of Sumter Cement Equipment stored in various storage locations overseas are included in **Attachment 3**. These pictures show the extent of Equipment that has been designed, purchased and fabricated for the Sumter Project.

Additionally Sumter Cement has spent approximately US \$50 million dollars in other Project related costs such as: purchasing of the site, project studies and development costs, project engineering, structural steel, building materials, etc. Large portions of structural steel have been delivered to the Sumter Cement site in Center Hill, Florida.

Therefore Sumter Cement is requesting an extension on its Air Permit No. PSD-FL-358 due to the extraordinary economic events as well as the extent and cost already incurred for the Project. Due to the developing national regulations for the Cement Sector, Sumter Cement Company would request an extension of 6 months till January 29, 2011. Following this date, Sumter Cement and the Department could re-evaluate the current permit to new regulatory limits for both NSPS and NESHAP and develop any additional Analysis or Modeling that maybe required to further extend the Permit. In addition Sumter Cement can provide a more detailed timeline for the future completion of the Sumter Cement Project.

Should you have any questions and/or comments concerning this, please contact me at (407) 802-3552

Respectfully,

A handwritten signature in black ink, appearing to read "Marty Fallon". The signature is fluid and cursive, with the first name "Marty" and last name "Fallon" clearly distinguishable.

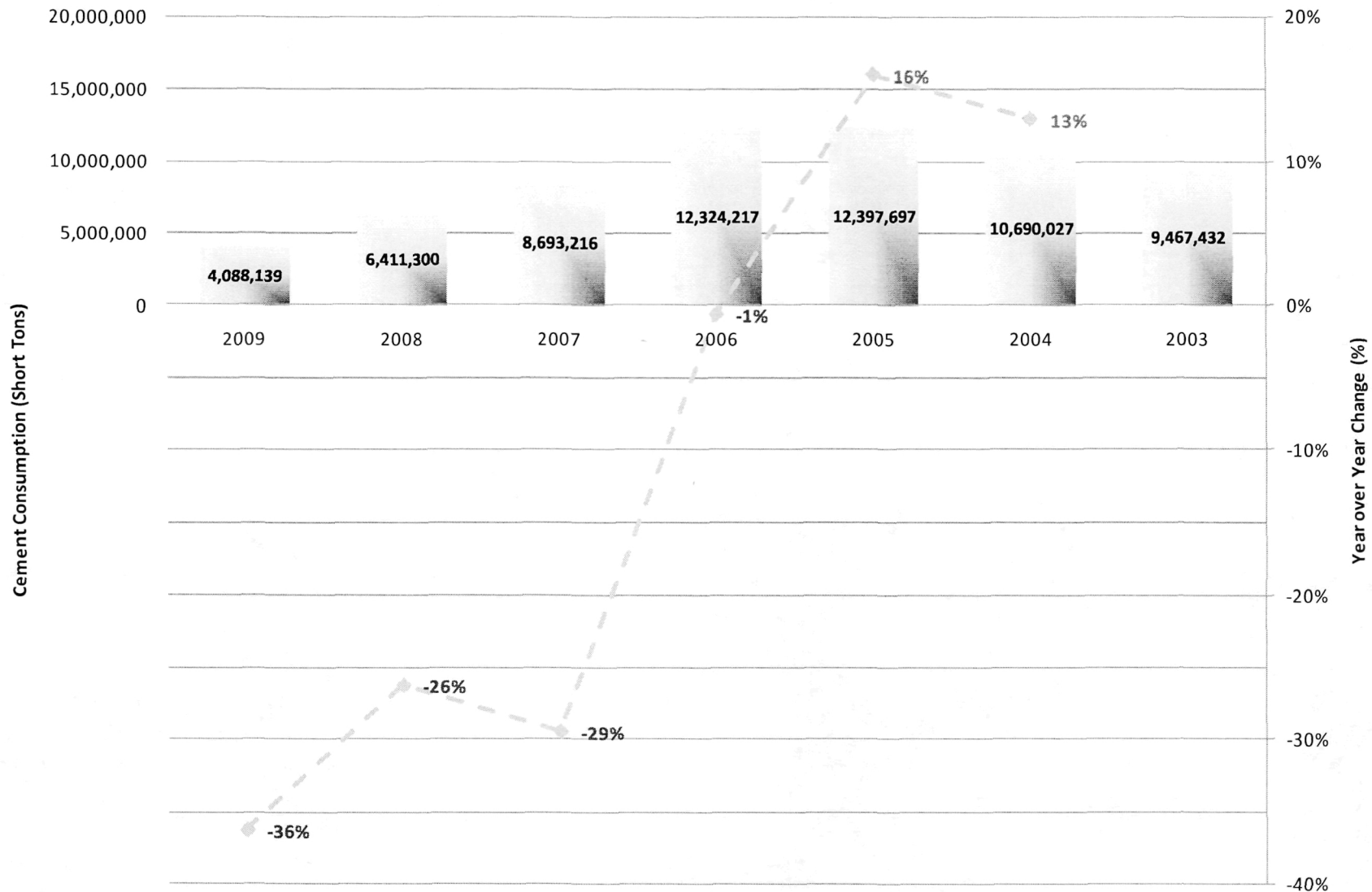
Marty Fallon
Chief Executive Officer
Sumter Cement Company

CC:

Al Linero – Florida Department of Environmental Protection
Jeff Koerner - Florida Department of Environmental Protection
Christy DeVore – Florida Department of Environmental Protection
Joe Horton – Sumter Cement Company

ATTACHMENT 1 – CEMENT CONSUMPTION

Florida Portland Cement Consumption



Florida Cement Consumption (stons)

Year over Year Change (%)

*From USGS Mineral Information

ATTACHMENT 2 – EQUIPMENT CONTRACT

CONTRACT

FOR
CEMENT PRODUCTION LINE (4000MTPD)
IN U.S.A.

BETWEEN

SUMTER CEMENT CO., LLC

AND

SINOMA INTERNATIONAL
ENGINEERING CO., LTD.

MAY 2007


Two handwritten signatures in black ink, one appearing to be 'Zhang' and the other 'DF'.

IN WITNESS WHEREOF, the parties hereto have caused this Contract to be signed by their respectively authorized representatives on the dates indicated.

FOR SUMTER CEMENT CO. LLC:


FOR SINOMA INTERNATIONAL
ENGINEERING CO. LTD.


MR. DANIEL R. FRITZ
CEO OF SUMTER CEMENT CO.


Mr. WANG WEI
PRESIDENT OF SINOMA INT'L

WITNESSES


MR. JOE HORTON
ASSISTANT PROJECT DIRECTOR
OF SUMTER CEMENT CO



MR. YU XING MIN
EXECUTIVE VICE PRESIDENT
OF SINOMA INT'L

PRESIDENT OF TCDRI

Date: May. 13, 2007

Date: May. 13, 2007

**ATTACHMENT 3 – SUMTER EQUIPMENT
STORAGE**

 LOESCHE America, Inc.	Markierung - MARQUAGE - MARCAJE CONSIGNED TO: Vitorantim Cimentos Brasil S/A Fazenda Maria Paula SR ZIP Code 18168-000 Sãto de Pirapora SP - Brazil Company ID: CNPJ 9642454/0222-09 State ID to IBE Company: Inscricao Estadual: 922.070.218.114 Shipment Port / Named Place: SUMTER CEMENT 8409 CR #69 SOUTH CENTER HILL, FLORIDA 33514 - USA	Verpackungsart - KIND OF PACKAGE TYPE D'EMBALLAGE - TIPO DE EMBALAJE CRATE OVER PALLET		Volumen (m³) VOLUME VOLUME VOLUMEN	4/5/2010 Rechnung Blatt PACKING LIST PAGE: LISTE DE COLSAGE PAGE: LISTA DE FOLIOS JCL:
		Project Number: LP07-001 CENTER HILL RM LP07001014	Abmessungen - MEASUREMENTS (IN) DIMENSIONS - DIMENSIONES (LXWXH) 29 X 10 X 12	Gewicht (LB) WEIGHT - POIDS - PESO NET CROSS 467 500	

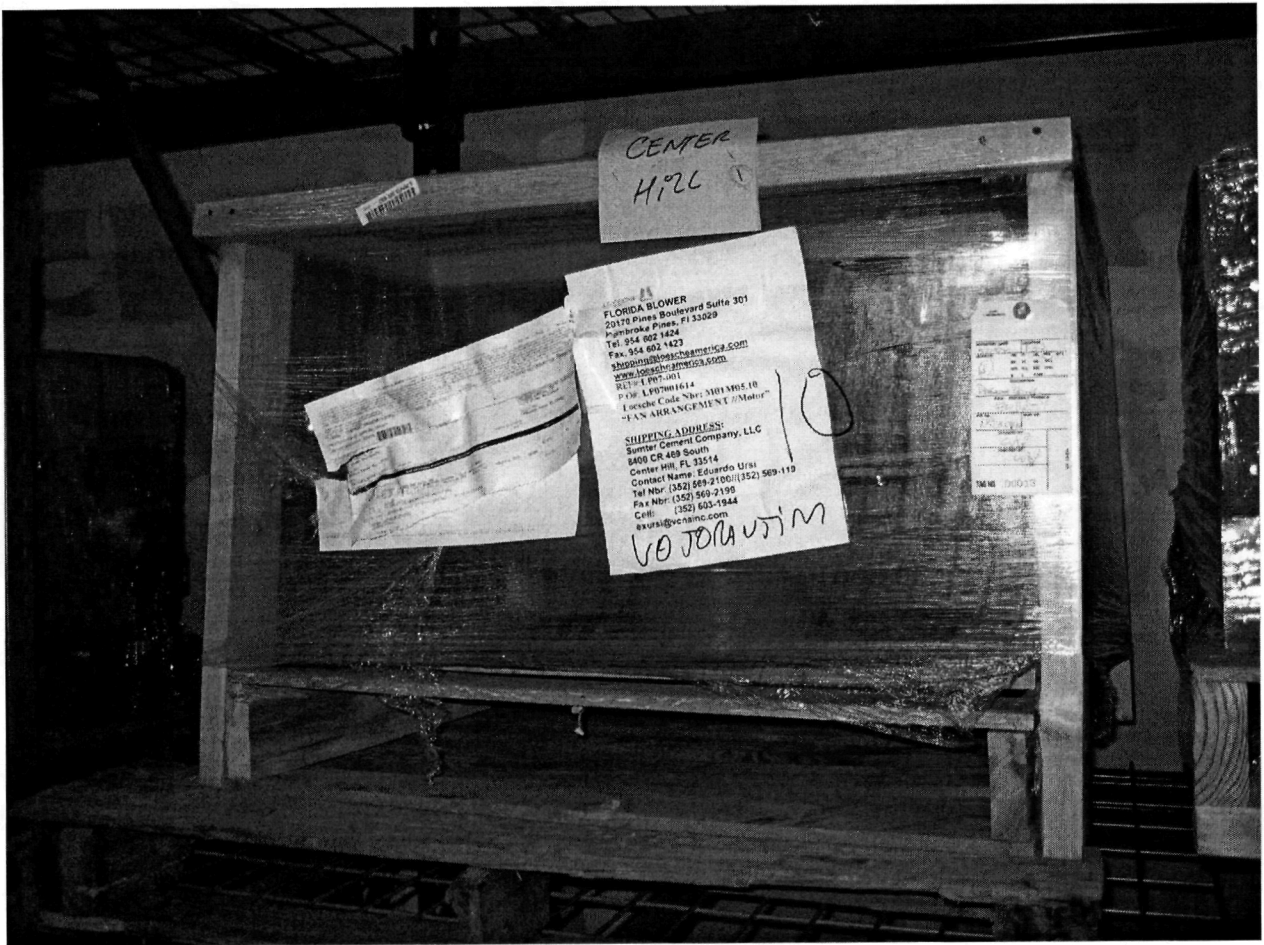
Stück PIECES PIEZAS	Inhalt CONTENTS - CONTENU - CONTENIDO	Zusammenst.-Zg.-Nr. ASSY. DRWG. NO. PLAN D'ENSEMBLE NO. PLANO DE CONJUNTO	Teil-Nr. PART NO. PIECE NO. PIEZA NO	LOESCHE - Code-Nr.	Code-Nr. des Kunden CUSTOMER'S CODE NO. CODE DU CLIENT NO. CLAVE DEL CLIENTE NO.	Bemerkungen NOTES NOTA NOTAS
0	FAN ARRANGEMENT FLOA BLOWER			M01.M150.10		
1	INCLUDES: FAN ARRANGEMENT # 4					
1	MOTOR MOUNTING FRAME					
1	WATER TYPE OUTLET DAMPER					
	WAFFER TYPE OUTLET DAMPER					
	PRESSURE BLOWER SILENCER					
	DRAIN					
	INLET FILTER					
	6" AND 8" FLEXIBLE CONNECTION FLANGE					

Detailed instructions must be provided to L

0281-209-956:Xd . P

Loesche Reference No.		Supplier Quote No.	Delivery Terms	Customer Order N
LP07-001 Center Hill RM		j lo 152014	FOB LaPorte	A03
Item #	Qty	Description	U/M	Drawing No.
10	1	Loesche Code No. M01.M150.10 Fan arrangement #4 Direct Drive CFM 2000SP 14.3 Fan RPM 3500BHP 8.33 Temperature: 70°F Altitude: Sea Level: New York Blower Size: 1608A 10 Fan Type: Pressure Blower		
20	1	Motor 360 460v TEFC 1.15 Service Factor, 10 HP, 3600 RPM, Weg. hi-effy, severe duty, IEEE841B41, Braxx Labyrinth Taconite Seals, External lube point, grease fillings. Note: motor not offered with v-ring slingers.		
30	1	Motor Mounting - Frame Size 215T		
40	1	Wafer-type outlet damper, 8", BL		
50	1	Pressure Blower Silencer, 8", flanged both ends		
60	1	Silencer support leg for inlet mounting		
70	1	Drain		
80	1	Inlet Filter with hood, 6", Ultra synthetic #98-2452		
90	1	Flexible Connector with Companion Flange 6" outlet		
100	1	Flexible Connector with Companion Flange 8" inlet		Fan

Packing Slip for Equipment Shipped to Sumter Cement Site in April of 2010 and received in June 2010.

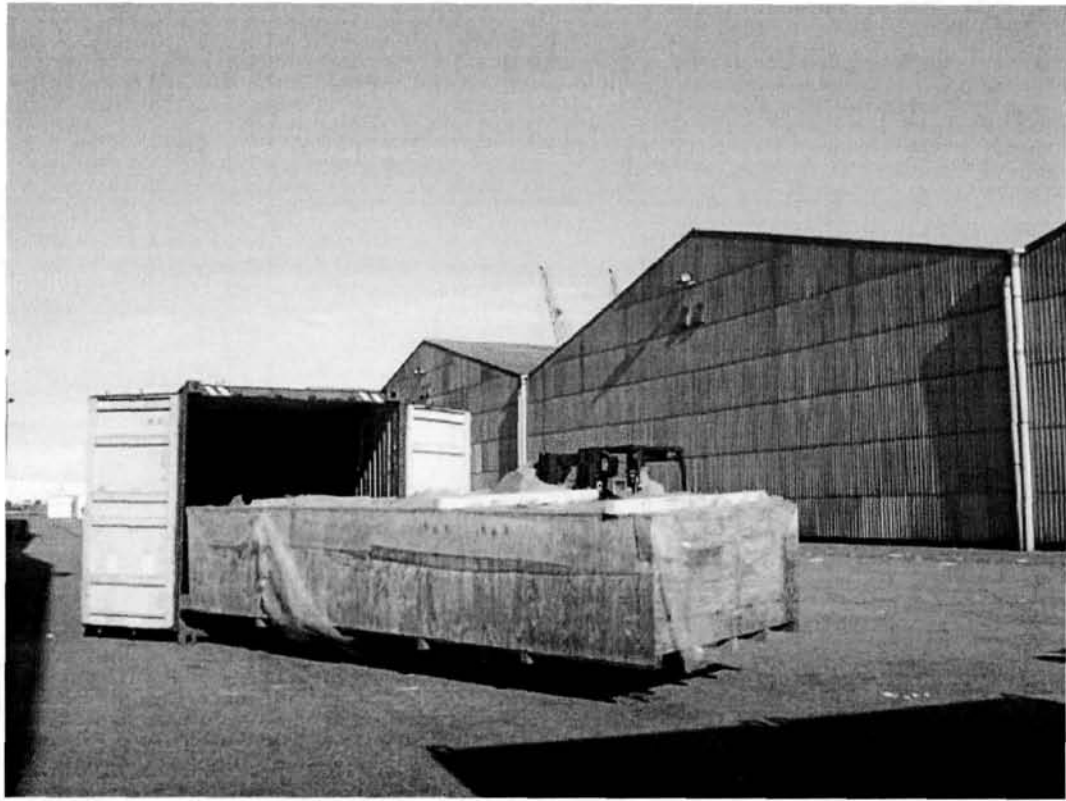


Example Package shipped to Center Hill with Marking and Shipping Information received in June 2010.



**Equipment Storage yard with Sumter Cement Equipment. (55 gallon drums
forefront of picture for scale reference)**





Additional Equipment Storage yard with Sumter Cement Equipment

