


# Florida Department of Environmental Protection

## Memorandum

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TO: Trina Vielhauer, Bureau of Air Regulation  
FROM: Jeff Koerner, New Source Review Section   
DATE: March 11, 2008  
SUBJECT: Permit No. 1190042-003-AC (PSD-FL-361B)  
American Cement Company  
Sumterville Cement Plant, Raw Mill Air Heater  
Amendment for On-Specification Used Oil

The American Cement Company is constructing a new cement plant in accordance with Permit No. PSD-FL-361. The company requests a permit amendment to allow the firing of on-specification used oil in the raw mill air heater. Currently, the air heater is only authorized to fire natural gas and distillate oil; however, the pyroprocessing system (kiln and calciner) is authorized to fire up to 1,500,000 gallons of on-specification used oil during any consecutive 12 months. The company requests that any on-specification used oil fired in the raw mill air heater be included in the cap for the pyroprocessing system. Separate fuel flow meters and record keeping will be used to demonstrate compliance with the fuel consumption cap. In addition, exhaust gases from the air heater will pass through the baghouse and stack that is shared with the pyroprocessing system. Therefore, no emissions increases will result from this change.

Attached for your approval and signature is a permit amendment allowing on-specification used oil as an alternate fuel for the raw mill air heater. Based on the circumstances and information provided by the company, I recommend your approval and signature.

Attachments



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

March 11, 2008

*Sent by Electronic Mail – Received Receipt Requested*

Mr. Cary O. Cohrs, President  
American Cement Company  
P.O. Box 1209  
Anthony, Florida 32617

Re: Project No. 1190042-003-AC (PSD-FL-361B)  
Sumterville Cement Plant  
Permit Amendment for On-Specification Used Oil in Raw Mill Air Heater

Dear Mr. Cohrs:

On January 22, 2008, the American Cement Company requested authorization to fire on-specification used oil in the raw mill air heater, which is under construction at the Sumterville Cement Plant. The air heater is currently permitted to fire natural gas and distillate oil. On February 28, 2008, we received additional information by e-mail that the on-specification used oil fired in the air heater would be included in the current cap for the pyroprocessing system (1,500,000 gallons during any consecutive 12 months). There will not be any emissions increases from this change.

**Determination:** All emissions from this air heater will pass through the same baghouse and stack as the pyroprocessing system. Since this change will not increase emissions, the Department approves the request as an amendment and Condition 10 in Section III.C. of the permit is changed as follows. Additions are highlighted with double underlines and deletions with ~~strikethrough~~.

- “10. Authorized Fuels: Only the following authorized fuels shall be fired in the pyroprocessing system (kiln and calciner): coal, petroleum coke, whole or chipped tires, natural gas, and No. 2 fuel oil and/or on-specification used oil fuel. The maximum heat input rate to the pyroprocessing system (kiln and calciner) shall not exceed 9,600 MMBtu per day (nominally 400 MMBtu/hr).
- The maximum heat input rate from firing whole or chipped tire derived fuel (TDF) shall not exceed 15% of the total pyroprocessing heat input rate (kiln and calciner) and shall not exceed 60 MMBtu per hour. The remaining 85% of the total pyroprocessing heat input rate shall be from the firing of other authorized fuels. TDF shall be directly fed into the kiln system at the transition section between the base of the calciner and the point where gases exit the kiln. The tire feed mechanism shall be designed with an airlock/gate system. Tires shall be stored, handled and managed in accordance with the provisions of Chapter 62-711, F.A.C.
  - The air heater shall fire only natural gas, on-specification used oil or distillate fuel oil (No. 2 or No. 4) with a design maximum heat input rate of 36 MMBtu per hour.
  - The firing of “on-specification” used oil fuel shall not exceed 1000 gallons per hour (kiln and calciner) and 1,500,000 gallons during any consecutive 12 months (kiln, calciner and raw mill air heater). On-specification used oil fuel shall meet the following specifications:

1. Arsenic shall not exceed 5.0 ppm;
2. Cadmium shall not exceed 2.0 ppm;
3. Chromium shall not exceed 10.0 ppm;
4. Lead shall not exceed 100.0 ppm;
5. Total halogens shall not exceed 1000 ppm; and
6. Flash point shall not be less than 100° F.

Used oil fired as a fuel may be generated from on site sources or purchased from a vendor. Used oil shall not contain any PCB's. [40 CFR 279.61; 40 CFR 761.20(e); Rule 62-4.070(3), F.A.C.]

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Application No. 1210465-014-AC]"

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Department of Environmental Protection's Bureau of Air Regulation is the Permitting Authority responsible for making a determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241 / Facsimile: 850/245-2303). Petitions must be filed within 14 days of receipt of this permit extension. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Department.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief  
Bureau of Air Regulation

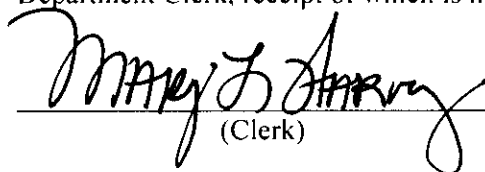
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this permit amendment was sent by electronic mail with received receipt requested before the close of business on 3/11/08 to the persons listed below.

- Mr. Cary O. Cohrs, American Cement Company ([ccohrs@americacementcompany.com](mailto:ccohrs@americacementcompany.com))
- Mr. George Townsend, American Cement Company ([gtownsend@americacementcompany.com](mailto:gtownsend@americacementcompany.com))
- Mr. John Koogler, Koogler & Associates ([jkoogler@kooglerassociates.com](mailto:jkoogler@kooglerassociates.com))
- Ms. Mara Nasca, SWD Office ([mara.nasca@dep.state.fl.us](mailto:mara.nasca@dep.state.fl.us))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



(Clerk)

3/11/08  
(Date)

~~Tracking Page~~

American Cement Company  
Sumterville Cement Plant, Raw Mill Air Heater

Project No. 1190042-003-AC (PSD-FL-361B)  
Amendment for On-Specification Used Oil

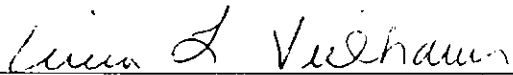
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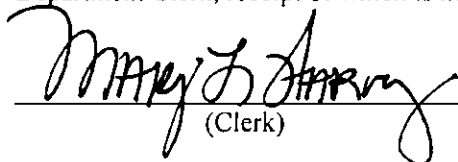
~~Mr. George Townsend, American Cement Company (gtownsend@americacementcompany.com)~~

~~Mr. John Koogler, Koogler & Associates (jkoogler@kooglerassociates.com)~~

Ms. Mara Nasca, SWD Office (mara.nasca@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

  
(Clerk)

3/11/08  
(Date)

**Harvey, Mary**

---

**From:** John Koogler [jkoogler@kooglerassociates.com]  
**Sent:** Tuesday, March 11, 2008 4:04 PM  
**To:** Harvey, Mary  
**Subject:** RE: American Cement Company - Project #1190042-003-AC(PSD-FL-361B)

Thank you!

John B Koogler  
Koogler & Associates, Inc  
4014 NW 13th St  
Gainesville, FL 32609  
352/377-5822  
jkoogler@kooglerassociates.com

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**From:** Harvey, Mary [mailto:Mary.Harvey@dep.state.fl.us]  
**Sent:** Tuesday, March 11, 2008 3:44 PM  
**To:** ccohrs@americacementcompany.com; gtownsend@americacementcompany.com;  
jkoogler@kooglerassociates.com; Nasca, Mara  
**Cc:** Koerner, Jeff; Walker, Elizabeth (AIR); Koerner, Jeff  
**Subject:** American Cement Company - Project #1190042-003-AC(PSD-FL-361B)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); this may be done by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site:  
<http://www.adobe.com/products/acrobat/readstep.html>.

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Thank you;

DEP, Bureau of Air Regulation

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

3/11/2008

## Harvey, Mary

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**From:** George Townsend [gtownsend@americacementcompany.com]  
**Sent:** Tuesday, March 11, 2008 4:06 PM  
**To:** Harvey, Mary  
**Subject:** Read: American Cement Company - Project #1190042-003-AC(PSD-FL-361B)  
**Attachments:** ATT91833.txt

### Your message

To: ccohrs@americacementcompany.com; gtownsend@americacementcompany.com;  
jkoogler@kooglerassociates.com; Nasca, Mara  
Cc: Koerner, Jeff; Walker, Elizabeth (AIR); Koerner, Jeff  
Subject: American Cement Company - Project #1190042-003-AC(PSD-FL-361B)  
Sent: 3/11/2008 3:43 PM

was read on 3/11/2008 4:05 PM.

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**Sent:** Tuesday, March 11, 2008 4:06 PM  
**To:** Harvey, Mary  
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Email messaged received

George Townsend  
Environmental Manager  
American Cement Company, LLC  
4750 E CR 470, P.O. Box 445  
Sumterville, FL 33585  
Phone: 352-569-5393  
Cell: 352-502-8029  
Fax: 352-569-5397  
[gtownsend@americancementcompany.com](mailto:gtownsend@americancementcompany.com)

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**Subject:** American Cement Company - Project #1190042-003-AC(PSD-FL-361B)

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**To:** Harvey, Mary

**Subject:** RE: American Cement Company - Project #1190042-003-AC(PSD-FL-361B)

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**Sent:** Tuesday, March 11, 2008 4:27 PM  
**To:** Harvey, Mary  
**Subject:** Read: American Cement Company - Project #1190042-003-AC(PSD-FL-361B)  
**Attachments:** ATT93058.txt

Your message

To: ccohrs@americancementcompany.com; gtownsend@americancementcompany.com;  
jkoogler@kooglerassociates.com; Nasca, Mara  
Cc: Koerner, Jeff; Walker, Elizabeth (AIR); Koerner, Jeff  
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Sent: 3/11/2008 3:43 PM

was read on 3/11/2008 4:26 PM.