

**Application Routing and Transmittal Sheet (A/C/AO/AF)**

Air Permitting Supervisor - Required Information for Project Setup by Admin			
Owner/(Facility Name, if needed):	American Cement Co. (ACC)	County:	Sumter
Facility ID No.:	1190042	Latitude:	
Project Name:	Operation permit revision - revise 001-AC	Longitude:	
Project Description:	Remove S.C. #29. g in Construction permit 1190042-001-AC		
Facility Type:	<input type="checkbox"/> New <input type="checkbox"/> Relocatable	Total Fee Submitted (\$):	250
Type/Subtype:	ACM1	Total Fee Required (\$):	250
Date Received:	08/05/2011	Net Fee Needed (\$):	
Fee Status:	<input checked="" type="checkbox"/> Correct <input type="checkbox"/> Incorrect <input type="checkbox"/> NA	Net Fee Refund (\$):	
Fee Checked By:	cz	Fee override reason:	NONE
Date Fee Checked:	08/05/2011	(if needed)	

*Draft Co-processed with 007-AV*

Admin - Project Setup Information				Permit Number:
Project Number:	008	Initial ARMS Entry	Date:	Initials:
				1190042-008-AC

Air Permitting Supervisor - Application Information					
Application Assigned To:	Zell_D	No. of Hardcopies:	4	Copies issued to DEP Engineer:	4
Date Assigned:	08/05/2011	No. of Disk:	na	Copies issued to County:	na
Confidential Information (Y/N):	n	EPSAP (Y/N):	n	Copies issued to other:	na

Compliance/Enforcement Review	
Courtesy email sent to compliance:	08/05/2011
Local Program Permit Review	

Air Permitting - Permit Transmittal (add initials & date completed)					
	Intent / Draft			Final	
Permit Clock Dates	Day 30:	Day 90:	11/03/11	Day 30:	Day 90: 11/28/11
Zipfile Name On Air_Common *	1190042-008.ac.d. American Cement.ep			1190042-008.ac.f. Amer Cement. Zip	
Final Permit Name On Air_Common *	/			NA	
Engineer → Permit Supervisor	DQZ 08/09/11			DQZ 09/06/11	
Permit Supervisor → DAPA	cf 8/15/11			cf 9/6/11	
DAPA → Clerk/Engineer					
Permit Package Mailed (Emailed)	8/15/11			9/6/11	
Arms Event Entry / Link Permitted E.U.	8/15/11			9/6/11	
Copy to Interested Party (Y/N)					
Posted to DEP Website	8/15/11			9/6/11	
ARMS Inventory Data Entry:	NA DQZ 09/06/11			Permitting Clerk:	9/6/11

Air Permitting Engineer - Data Fields for Access System (add at final Issuance)			
Issue Date:		MACT:	
Facility Description:		NSPS:	
Source Description:		FUEL:	
296:		Control Equip.:	
Project Description / Comments:	NA		
Permit Clerk - Permit List Data Entry (Access):			

Special Routing
Secretary to send final permit to compliance section manager
ASSIGNED TO BILL 9/22/11

008-AC

**Prickett, Patricia**

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**From:** jkoogler@kooglerassociates.com  
**Sent:** Tuesday, September 06, 2011 12:55 PM  
**To:** Prickett, Patricia  
**Subject:** Delivered: AMERICAN CEMENT CO., SUMTERVILLE PLANT; 1190042-008-AC  
**Attachments:** ATT00001

Your message was delivered to the recipient.

**Prickett, Patricia**

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**From:** John Koogler [jkoogler@kooglerassociates.com]  
**Sent:** Tuesday, September 06, 2011 1:41 PM  
**To:** Prickett, Patricia  
**Subject:** Read: AMERICAN CEMENT CO., SUMTERVILLE PLANT; 1190042-008-AC  
**Attachments:** ATT00001

**Importance:** High



Cash Receiving Application - Collection Point Log Remittance

CL AREA **SWD** CRAF006A  
Logged Total **\$250.00**

**Collection Point Log Remittance**

Remittance ID: **948848** Type: **CP** Received Date: **08/05/2011** Status: **RECEIVED**

System Receipt: **753135** PNR:  Check #: **405010** Amount: **250.00**

SSN/FEID:  Name: **AMERICAN CEMENT COMPANY LLC**

First:  Middle:  Title:  Suffix:

Address1: **PO BOX 445**

Address2:

City: **SUMTERVILLE** ST: **FL** Zip: **33585**

Country:  Short Comments: **AIR 1190042-008**

**PAYMENT(S)**

Payment ID	CL Area	Code/Description	Payment Amount	Reference#	Appl	Fund *	Grant *	Status
<b>1104976</b>	<b>SWD</b>	<b>002222 AIR CONSTRUCT</b>	<b>250.00</b>		<b>ARMS</b>	<b>PFTF</b>		<b>COMPLETE</b>
<b>COMMIT FREQUENTLY</b>			<b>250.00</b>	<b>Payment Total</b>				

Press <TAB> to accept Collection Point or enter F&A



Permitting Application - Permit Detail and Log Permit

**ARMS Facility**

POINT:  AIRS ID: **1190042** STATUS: **C** OFFICE: **SWD** SW: **TAMPA**

SITE NAME: **AMERICAN CEMENT CO., SUMTERVILLE PLANT** COUNTY: **SUMTER**

OWNER/COMPANY: **AMERICAN CEMENT COMPANY, LLC**

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**Project**

AIR Permit #:  Project #: **008** CRA Reference #: **373667**

Permit Office: **SWD (DISTRICT)** Agency Action: **Pending** OGC:

Project Name: **OPERATION PERMIT REVISION** Desc: **Revise 001-AC. Remove S.C. #29.g in construction permit 1190042-00**

Type/Sub/Des: **AC / M1 Minor Modification** Logged: **08/08/2011**

Received: **08/05/2011** Issued:  Expires:  Application Action: **MODIFICATION**

Fee: **250.00** Fee Recd: **250.00** Dele:  Override: **NONE**

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**Related Party**

Role: **APPLICANT** Begin: **08/08/2011** End:

Name: **KOOGLER, JOHN B** Company: **KOOGLER AND ASSOCIATES INC**

Address: **4014 NW 13TH STREET**

City: **GAINESVILLE** State: **FL** Zip: **32609** Country: **U.S.A.**

Phone: **352-377-5822** Fax: **352-377-7158**

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**Processors**

Processor: **ZELL\_D** Active: **08/08/2011** Inactive:  Events:

Enter Project Name



## SWD PERMITTING MEMORANDUM

TO: Cindy Zhang-Torres, P.E.,  
Air Permitting Manager

FROM: David Zell *DZ*  
Air Permitting Engineering Specialist

DATE: 09/06/11

SUBJECT: FINAL Air Construction Permit 1190042-008-AC  
American Cement Company, LLC  
Sumterville Cement Plant

Day 90: 11/28/11

The final permit for this project is attached for your approval and signature, which authorizes deletion of requirement in Construction Permit 1190042-006-AC relating to posting of real-time emissions data on a company website. The project results in a minor source air construction permit.

The Final Determination, attached to the Final Permit, summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

AC File Copy

August 24, 2011

Dept. Of Environmental Protection

AUG 26 2011

Southwest District

Ms. Cindy Zhang-Torres, P.E.  
Air Permitting Manager  
FDEP, Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

**RE: Affidavit of Publication  
Public Notice of Intent to Issue Air Permits  
Revised Draft Permit No. 1190042-007-AV  
Draft Permit No. 1190042-008-AC ←  
American Cement Company, LLC**

Find enclosed the Affidavit of Publication of the Public Notice of Intent to Issue Air Permits for Revised Draft Permit No. 1190042-007-AV and Draft Permit No. 1190042-008-AC. The notice was published in the Daily Commercial on Thursday, August 18, 2011.

If you have any questions call me at 352-569-2217.

Sincerely,

AMERICAN CEMENT COMPANY, LLC

Charles Robertson  
Environmental Manager

Copies to: Mr. David Zell, Project Engineering Specialist  
Mr. Cary Cohrs, President, American Cement Company, LLC  
Mr. William Wall, Plant Manager, American Cement Company, LLC

Enclosure: Affidavit

# Affidavit of Publication

## Daily Commercial

Leesburg, Lake County, Florida

Case No. \_\_\_\_\_

STATE OF FLORIDA  
COUNTY OF LAKE

Before the undersigned authority personally appeared Ron Wallace who on oath says that he is the Publisher of the Daily Commercial, a daily newspaper published at Leesburg in Lake County, Florida, that the attached copy of advertisement, being

295139

in the matter of Notice of Intent

in the \_\_\_\_\_ Court,

was inserted in said newspaper in the issues of \_\_\_\_\_

Aug. 18, 2011

Affiant further says that the said Daily Commercial is a newspaper published in said Leesburg, in said Lake County, Florida, and that the said newspaper has heretofore been continuously published in said Lake County, Florida each day and has been entered as second class matter at the post office in Leesburg in said Lake County, Florida, for a period of one year preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Signed [Signature]  
Ron Wallace, Publisher

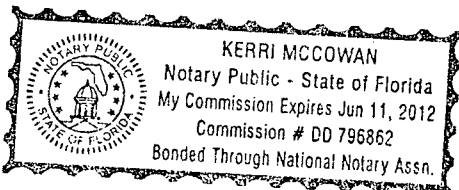
Sworn to and subscribed before me this 19 day of

Aug, 2011, by Ron Wallace,

Publisher, who is personally known to me.

(Seal)

[Signature]  
Kerri McCowan, Notary Public



E. CR 470, P.O. Box 445, Sumterville, FL 33585.

Facility Location: The applicant operates the existing Sumterville Cement Plant, which is located in Sumter County at 4750 E. CR 470, Sumterville, Florida.

Project: The applicant applied on August 11, 2010, to the Department for an initial Title V air operation permit for this facility. The applicant applied on August 2, 2011 to the Department for an air construction permit revision to revise one initial construction permit requirement and incorporate it into the initial Title V operation permit. The facility consists of a nominal 1,150,000 tons per year dry process Portland cement manufacturing plant and a surface limestone mine. The manufacture of Portland cement primarily involves the crushing, grinding, and blending of limestone, clays, and other raw materials into a chemically proportioned mixture which is heated in a rotary kiln to extremely high temperature to produce clinker nodules. The clinker is cooled and ground with a small quantity of gypsum to produce finished cement.

The plant equipment includes: a primary limestone crusher and conveyance equipment to transport limestone to raw material storage; a raw material storage building for limestone and materials containing silica, iron, and additives; stackers, reclaimers, and conveyance equipment to raw materials storage, drying and milling; an in-line raw mill that simultaneously dries raw materials using the exhaust gas from the preheater/calcliner (PH/C), kiln, and clinker cooler; an air heater for use when additional drying capacity is required; a homogenizing (blending) silo; a coal and petroleum coke mill; a dry process PH/C kiln capable of producing 3,000 tons per day of clinker; whole tire kiln feeder system; a reciprocating clinker cooler; conveyance equipment to cement clinker storage; conveyance equipment to the cement finish mill; cement storage silos and a truck loadout area; and a packhouse. The plant uses pulverized coal, petroleum coke, whole scrap tires, diesel fuel, and on-specification used oil as fuel sources for the calcliner/kiln system. The primary calcliner/kiln operating fuel is pulverized coal. The air heater is fired with natural gas, distillate fuel oil, and on-specification used oil.

Nitrogen oxides (NOx) emissions are minimized by indirect firing in a low-NOx main kiln burner, and staged combustion and a selective non-catalytic reduction (SNCR) ammonia injection system in the calcliner. Sulfur dioxide (SO2)

**PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMITS**  
Florida Department of Environmental Protection  
Southwest District  
Revised Draft Permit No. 1190042-007-AV  
Draft Permit No. 1190042-008-AC  
American Cement Company, LLC  
Sumter County, Florida

Applicant: The applicant for this project is American Cement Company, LLC. The applicant's responsible official and mailing address are: Mr. Cary O. Cohrs, President, American Cement Company, LLC, 4750

transfer, grinding, and handling. Fugitive PM/PM10 emissions from raw material piles, loading operations, transportation, etc. are controlled by reasonable precautions including paving, road sweeping, watering, planting grass, etc.

This plant is subject to the maximum achievable control technology (MACT) requirements in 40 CFR 63 Subpart LLL - National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, which regulates emissions of PM, mercury, total hydrocarbons (THC), dioxins/furans (D/F) and hydrochloric acid (HCl). In addition, the plant is subject to the Department's determination of best available control technology (BACT) for NOx, CO, SO2, VOC and PM/PM10 and the associated BACT emission limitations for each of these air pollutants.

This facility includes continuous emissions monitoring systems (CEMS) for NOx, CO, SO2, total hydrocarbons (THC)/VOC, opacity, and mercury (Hg) on the pyroprocessing system main fabric filter baghouse exhaust stack.

The revised Title V air operation permit (No. 1190042-007-AV) is the initial Title V air operation permit for this facility, and incorporates the terms and conditions of Construction Permit Nos. 1190042-001-AC (PSD-FL-361), 1190042-002-AC, 1190042-003-AC, and 1190042-008-AC.

The air construction permit (No. 1190042-008-AC) deletes Specific Condition No. 29.g. in Section III, Subsection C. of Construction Permit 1190042-001-AC. This condition was a requirement to make emissions data available in real time on the company website. This requirement is no longer considered necessary or warranted since the two other cement manufacturing plants previously planned for the area near the American Cement plant have not been constructed, nor do they currently have

Permits for future construction

This air construction permit modification is being processed with the revised initial Title V air operation permit 10042-007-AV).

Permitting Authority: Applicants 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, 62-213 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.

Applications for Title V air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, 62-213 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and a Title V air operation permit is required to operate the facility.

The Department of Environmental Protection's Air Resource Section in the Southwest District is the Permitting Authority responsible for making a permit determination for these projects. The Permitting Authority's physical address is: 13051 N. Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's mailing address is: 13051 N. Telecom Parkway, Temple Terrace, Florida 33637-0926. The Permitting Authority's telephone number is 813-632-7600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the address indicated above for the Permitting Authority. The complete project file includes the draft permits, the statement of basis, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may view the draft permits by visiting the following website: <http://www.dep.state.fl.us/air/emission/apds/default.asp> and entering the permit numbers shown above. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permits: The Permitting Authority gives notice of its intent to issue a draft Title V air operation permit to the applicant for the project described above. The applicant has provided reasonable assurance that continued operation of the existing equipment will not adversely impact and that the applicant will comply with the provisions of 62-4, 62-210, 62-212, 62-213, and 62-297, Florida Statutes, and 62-210, 62-213 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.

and that the applicant will comply with the provisions of 62-4, 62-210, 62-212, 62-213, and 62-297, Florida Statutes, and 62-210, 62-213 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 Permitting Authority also gives notice to issue a construction permit for the project described above. The applicant has provided reasonable assurance that the project will comply with the provisions of 62-4, 62-210, 62-212, 62-213, and 62-297, Florida Statutes, and 62-210, 62-213 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.

Comments: Authority will accept comments on draft Title V permit for a period of 30 days from the date of publication of the draft permit. Written comments received by the Authority within 30 days of the date of publication of the draft permit will be considered. If you wish to comment on the draft permit, please contact the Permitting Authority at the address or phone number listed above. The Authority will accept comments on draft Title V permit for a period of 30 days from the date of publication of the draft permit. Written comments received by the Authority within 30 days of the date of publication of the draft permit will be considered. If you wish to comment on the draft permit, please contact the Permitting Authority at the address or phone number listed above.

**FINAL DETERMINATION**

Natural Resources of Central Florida dba

American Cement Company

Sumterville Plant

DEP File No. 1190042-001-AC (PSD-FL-361)

On December 19, 2005 the Florida Department of Environmental Protection (Department) distributed an "Intent to Issue Air Construction Permit" to construct a nominal 1,150,000 tons per year greenfield portland cement plant with a dry process preheater/calcliner kiln, in-line raw mill, clinker cooler and associated materials handling, storage, conveyance and shipping facilities. The project will be located east of Sumterville and north of County Road 470 in Sumter County.

The package included the Department's Draft Air Construction Permit, the "Intent to Issue Air Construction Permit," the "Technical Evaluation and Preliminary Determination," and the "Public Notice of Intent to Issue Air Construction Permit." The Department sent copies of the package to various persons, agencies, and municipalities. American Cement Company (ACC) published the Public Notice in the *Daily Commercial* on December 20, 2005 and provided to the Department the required proof of publication. The Public Notice provided a period of 30 days (through January 18, 2006) during which the Department can consider comments received.

The Department received numerous "form" type letters from the public throughout the comment period including comments regarding the Draft Air Construction Permit and one late request for a public meeting. Written comments were received from an independent consulting group, Fletcher Group Engineering and Environmental Solutions, on January 17. The Department received comments from Koogler & Associates, representing the applicant, on January 20 (beyond the comment deadline of January 18).

All comments are listed below (*italics*) followed by the Department's responses.

Any additions to permit conditions are double underlined and deletions are indicated by double strike-through notation.

1. Most of the public written comments received during the public comment period for this project were copies of a single form-type letter signed by various people living within Sumter and adjacent counties. The letter also served as written comment regarding the recently issued Intent to Issue Air Construction Permit to the Sumter Cement Company, Center Hill Plant (1190041-001-AC, PSD FL-358). The letter included the following requests:

- a) *While I am encouraged to see your decision to order CEM (continuous emissions monitoring) for mercury in the two referenced facilities, I believe that ALL parameters monitored by the CEM packages in these two facilities should be required, as a condition of their finalized permits, to be available continuously on-line in a real-time format in a web site to be maintained by the operators of these facilities, said web sites to be available for access at any time by the public to review the data displayed.*

**Response**

The Department received letters during the application review period prior to distribution of the draft permit and included the mercury CEMS in the draft permit.

In response to the subsequent request received during the public comment period, the following specific condition will be added to Section III. D. Pyroprocessing System, Condition 29, CEMS Data Requirements, as 29.g:

**Prickett, Patricia**

---

**From:** Cary Cohrs [ccohrs@americancementcompany.com]  
**Sent:** Monday, August 15, 2011 4:37 PM  
**To:** Prickett, Patricia  
**Cc:** crobertson@americancementcompany.com; SCullen@kooglerassociates.com; Zell, David; Zhang-Torres  
**Subject:** RE: AMERICAN CEMENT CO., SUMTERVILLE PLANT; 1190042-007-AV/008-AC

I have received the document. Thank you.

Cary Cohrs

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**From:** Prickett, Patricia [mailto:Patricia.Prickett@dep.state.fl.us]  
**Sent:** Monday, August 15, 2011 4:13 PM  
**To:** ccohrs@americancementcompany.com  
**Cc:** crobertson@americancementcompany.com; SCullen@kooglerassociates.com; Zell, David; Zhang-Torres  
**Subject:** AMERICAN CEMENT CO., SUMTERVILLE PLANT; 1190042-007-AV/008-AC  
**Importance:** High

Attention: Mr. Cary O. Cohrs, President

Owner/Company Name: AMERICAN CEMENT COMPANY, LLC  
Facility Name: AMERICAN CEMENT CO., SUMTERVILLE PLANT  
Project Number: 1190042-007-AV/008-AC  
Permit Status: REV DRAFT  
Permit Activity: NEW TITLEV FACILITY  
Facility County: SUMTER

Dear Mr. Cohrs:

**IMPORTANT: We must receive verification, by email, that you are able to access both LINKS below and the Attachments above. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).**

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1190042.007.AV.R\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1190042.007.AV.R_pdf.zip)

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1190042.008.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1190042.008.AC.D_pdf.zip)

Attached is the official **Revised Written Notice of Intent to Issue Title V Air Operation Permit and Minor Air Construction Permit** for the projects referenced above. The Revised Written Notice of Intent to Issue Title V Air Operation Permit and Minor Air Construction Permit (including the Revised Draft Permits and the Attachments) has been posted on the Department of Environmental Protection's Southwest District website.

Click on the link displayed above to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".



Permit project documents that are addressed in this e-mail may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

The Southwest District is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "Air Permit Documents Search" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

For your convenience, I have also attached the Revised Public Notice of Intent to Issue Title V Air Operation Permit and Minor Air Construction Permit in a word document.

If you should have any questions, please contact Dave Zell, the Permit Engineer at [David.Zell@dep.state.fl.us](mailto:David.Zell@dep.state.fl.us).

Sincerely,

*Patricia Prickett*

Patricia Prickett  
Senior Clerk  
FDEP - Air Program - SWD  
(813) 632-7600 Ext 102

Email: [Patricia.Prickett@dep.state.fl.us](mailto:Patricia.Prickett@dep.state.fl.us)

Please Note: Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding State or Local business are public records available to the public and media upon request. Your email communications may therefore be subject to public disclosure.

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. 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.*

**Prickett, Patricia**

---

**From:** Prickett, Patricia  
**Sent:** Monday, August 15, 2011 4:13 PM  
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**Cc:** 'crobertson@americacementcompany.com'; 'SCullen@kooglerassociates.com'; Zell, David; Zhang-Torres  
**Subject:** AMERICAN CEMENT CO., SUMTERVILLE PLANT; 1190042-007-AV/008-AC  
**Attachments:** 1190042.007.av.rev.d.008.ac.d.Amer Cement.public notice.doc;  
1190042.007.av.rev.d.008.ac.d.American Cement.written notice.pdf

**Importance:** High

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	'ccohrs@americacementcompany.com'	
	'crobertson@americacementcompany.com'	
	'SCullen@kooglerassociates.com'	
	Zell, David	Delivered: 8/15/2011 4:13 PM
	Zhang-Torres	Delivered: 8/15/2011 4:13 PM

Attention: Mr. Cary O. Cohrs, President

Owner/Company Name: AMERICAN CEMENT COMPANY, LLC  
Facility Name: AMERICAN CEMENT CO., SUMTERVILLE PLANT  
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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1190042.008.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1190042.008.AC.D_pdf.zip)

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If you should have any questions, please contact Dave Zell, the Permit Engineer at [David.Zell@dep.state.fl.us](mailto:David.Zell@dep.state.fl.us).

Sincerely,

*Patricia Prickett*


Patricia Prickett  
Senior Clerk  
FDEP - Air Program - SWD  
(813) 632-7600 Ext 102

Email: [Patricia.Prickett@dep.state.fl.us](mailto:Patricia.Prickett@dep.state.fl.us)

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**SWD PERMITTING MEMORANDUM**  
**&**  
**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

TO: Cindy Zhang-Torres, P.E.,  
Air Permitting Manager

FROM: David Zell, Air Permitting Engineering Specialist 

DATE: 08/09/11

SUBJECT: REVISED DRAFT Initial Title V Air Operation Permit No. 1190042-007-AV  
DRAFT Air Construction Permit 1190042-008-AC  
American Cement Company, LLC, Sumterville Cement Plant

Day 90: 10/31/11 for 008-AC (Not Applicable for 007-AV)

On 04/05/11, the Department issued the written notice and DRAFT permit for the American Cement Company, LLC (American Cement) initial Title V air operation permit project (1190042-007-AV). When an extended period of time had passed with no information on the publication of the public notice, American Cement was contacted by email on 06/16/11 and 07/13/11 to find out the status of publication of the public notice. We were informed each time that the applicant and their consultant were still reviewing the DRAFT permit, would have comments to submit prior to publication of the public notice, and planned on requesting a meeting to discuss their comments. On 07/25/11, American Cement and their consultant, John Koogler of Koogler & Associates, met with Cindy Zhang-Torres and me at the SW District office to discuss their comments and requested changes on the DRAFT permit. On 07/26/11 their comments were formally submitted by email in the form of an electronic MS WORD copy of the DRAFT permit with the requested changes and associated comments shown. The public notice for this project was not published, pending review of their comments.

The requested changes include corrections and clarifications to process descriptions, clarifications added to specific conditions or notes to specific conditions, and a correction to the interim NESHAP Subpart LLL THC (total hydrocarbon) limitation for EU No. 003 (Pyroprocessing System). These requested changes will require revisions to the DRAFT Title V permit and issuance of a REVISED DRAFT Title V written notice and permit.

On 07/27/11, American Cements consultant submitted an additional comment by email and followed that up with an 08/01/11 call to Cindy Zhang-Torres reporting their call to DARM concerning this last requested change, which was to delete a requirement included in the initial PSD construction permit for this facility (issued by DARM) to make emissions data available on a real-time basis on the company website. Based on that call to DARM, it was determined that the requested deletion could be made but that it would require a construction permit revision. It was agreed that the SW District would issue this AC revision co-processed with the REVISED DRAFT of the Title V permit (which would also incorporate the revision being made in the construction permit). The application for this AC revision was received on 08/05/11.

On 07/26/11, Cindy Zhang-Torres and I called Ana Oquendo of EPA Region IV to inform her of the status of this project, which she has indicated that she has targeted for review. On that same day, Cindy also forwarded to Ana American Cement's comments on the Draft Title V permit.

This memo serves as the technical evaluation and preliminary determination for the construction permit project (008-AC) as there is no change in potential emissions; and there is no rule applicability issues associated with making the requested change to the construction permit.

I recommend that this REVISED DRAFT AV and DRAFT AC permits package be sent out as attached and submit it for your review and approval.

**Prickett, Patricia**

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**From:** Prickett, Patricia  
**Sent:** Friday, August 05, 2011 3:20 PM  
**To:** Schroeder, Bill  
**Cc:** Zell, David  
**Subject:** American Cement Company (ACC) 1190042-008-AC

The permitting section has received an application from American Cement Company (ACC). The application is to remove s.c. #29.g in construction permit 1190042-001-AC. The Project No. is 1190042-008-AC. If you have any comments or concerns, please contact the permit engineer Dave Zell.

Thank you,

*Patricia Prickett*

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Senior Clerk  
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