



July 3, 2012

Jeffrey Koerner, P.E.  
Program Administrator  
Florida Department of Environmental Protection  
Division of Air Resource Management  
2600 Blair Stone Road, MS 5500  
Tallahassee, FL 32399-2400

Dear Jeff,

In 2005, American Cement Company, LLC was issued an Air Construction permit by the Florida Department of Environmental Protection Agency to construct a Greenfield Cement Plant in Sumterville, Sumter County, Florida.

The permit was issued for a facility that would eventually produce 125 tons per hour (1,095,000 annually) of clinker.

On September 19, 2011, the department issued the proposed Title V Operating Permit subjected to review by the United States Environmental Protection Agency.

During our recent equipment supplier warranty and guarantee testing, it was obvious the kiln system, as constructed, was capable of more production. It is not unusual for Greenfield Plants to be able to produce more capacity than that originally specified by the equipment supplier.

While employed by Florida Rock Industries, Inc., where I constructed a similar system to that of American Cement Company, LLC, we requested and were granted an increase in capacity as a result of the plants ability to produce more than originally granted in the initial Title V permit.

From my own experience, and that which we have obtained during operations at our Sumterville plant, American Cement believes it can easily achieve an additional 10% production capacity through all processing areas.

We respectfully request the department to increase our clinker production capacity on an hourly rate to 137.50 stph with an annual clinker production of 1,204,500. Input capacity adjustments and throughput rate adjustments for various pieces of equipment will be made (without physical modification) in order to achieve and/or accommodate the new clinker capacity.

Additionally, we request an increase in our cement grinding capacity from a nominal 1,150,000 stpy to 1,300,000 stpy to allow for the processing of additional clinker production.

American Cement Company's facility has been designed to easily achieve the additional capacity due to equipment being oversized in many areas.

Our kiln ID fan operates with a variable frequency drive allowing for airflow adjustment as required. We currently allow only 20% of the airflow capacity to pass at full production. Given nearly 80% more airflow available, we can easily achieve an increase in production.

At full production, the kiln is loaded to only 60% of drive capacity, which again allows for more material throughput with no changes required.

The clinker cooler is oversized and will easily handle 3300 tpd. Not only are the cooling fans capable of additional air capacity, the intermediate roll crusher allows for increased processing.

The coal mill is rated for 20 tph. Currently at maximum capacity, we are only grinding at 14 tph. The additional volume is sufficient to reach the higher production rate.

Based on my experiences with several Greenfield Plants and numerous other cement manufacturing facilities around the country, it is my opinion the American Cement Sumterville Plant will easily achieve 3300 stpd clinker with its current configuration.

Should you have any questions, please feel free to contact me.

Sincerely,

AMERICAN CEMENT COMPANY, LLC



Cary O. Cohrs  
President

Copy: Brian Accardo, FDEP, Tallahassee  
Syed Arif, FDEP, Tallahassee

COC/wsp