



ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
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KA 624-98-01

January 21, 2000

RECEIVED

JAN 24 2000

BUREAU OF AIR REGULATION

Mr. A. A. Linero
Florida Department of ;
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Suwannee American Cement Company, Inc.
Permit 1210465-001-AC, PSD-FL-259
Comment on EPA Letter Dated December 23, 1999

Dear Al:

For the record, I would like to comment on the letter you received from Doug Neeley of EPA, Region 4 dated December 23, 1999, related to mercury emissions from the Suwannee American Cement Company plant. In that letter, EPA comments on the condition in the referenced permit that limits the mass of mercury entering the cement plant pyroprocessing system to 184 pounds per year. The statement is made by EPA that this limit seems to be derived from an AP-42 emission factor for a kiln using an electrostatic precipitator for particulate matter control.

As you know, information we provided the Department on February 25, 1999, included three estimates of mercury emissions; one based on the estimated mercury contents of feed materials and fuel, one based on measured mercury emissions from 15 Portland cement plants, and one based on an AP-42 emission factor. The estimate based on the AP-42 factor resulted in the emission rate of 184 pounds of mercury per year; the higher of the three estimates. All three estimates however demonstrated that the mercury emissions from the Suwannee American plant would be less than 200 pounds per year, an emission rate that would not be significant (as defined by PSD regulations). As a result of that demonstration, the Department, by permit condition, limited the amount of mercury entering the pyroprocessing system to 184 pounds per year. This limit provided assurance that mercury emissions from the plant would not exceed 200

pounds per year, assuming all of the mercury entering the pyroprocessing system is emitted to the atmosphere.

As EPA surmised in their December 23, 1999, letter, the 184 pounds per year mercury estimate was based on the AP-42 emission factor for kilns with particulate matter controlled by an electrostatic precipitator. EPA goes on to state that since particulate matter emissions from the pyroprocessing system will now be controlled by baghouse, the permit should limit the mercury emissions from the plant to approximately 20 pounds per year; the emission rate calculated using the AP-42 mercury emission factor for kilns with particulate matter emissions controlled by baghouse.

A review of the references cited in AP-42 for the mercury emission factors for Portland cement plants indicates that the mercury emission factor for kilns with electrostatic precipitators is based on one test possibly covering two kilns at the same plant site and the mercury emission factor for kilns with fabric filters is based on tests at only two plant sites.

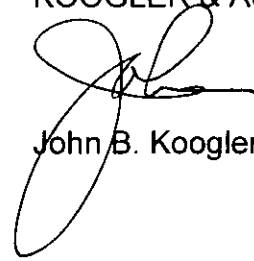
If one considers the chemistry of mercury in the pyroprocessing system of a modern preheater, precalciner cement plant (with no cement kiln dust waste), it is reasonable to expect that virtually all of the mercury that is input to the system will be discharged to the atmosphere. This holds true regardless of the particulate matter control device; i.e., an electrostatic precipitator or a fabric filter (baghouse). The fact that AP-42 shows such widely differing mercury emission factors for kilns with precipitators and baghouses is in all likelihood a function of the variability in the mercury input to the three or four kilns for which data were available and not a function of the control devices.

At present, Suwannee American has agreed to a permit condition that will limit mercury emissions (mercury input into the plant assuming all of the mercury is released to the atmosphere) to 184 pounds per year. Further, and as a permit condition, the company has agreed to a feed material and fuel monitoring plan to demonstrate that this limit will not be exceeded. To revise this limit based on only three or four comparative tests at plants of unknown design, with unknown operating conditions and with unknown feed and fuel characteristics is not warranted considering the chemistry of mercury in cement plant pyroprocessing systems, considering mercury emission data from a much broader base of plants and considering the fact that the mercury emissions are already less than significant in regulatory terms.

If there are any questions regarding these comments, please do not hesitate to contact me at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES



John B. Koogler, Ph.D., P.E.

JBK:wa

- C: Mr. Joe Kahn, FDEP ✓
Mr. Fred Koester, Suwannee American
Mr. Chuck Yagel, Suwannee American
Mr. Frank Darabi, Darabi & Associates
Mr. Larry Sellers, Holland & Knight

EPA
NPS
NED -
J. Chiselm, OGC

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JAN 12 2000

BUREAU OF AIR REGULATION

January 3, 2000

*Clair - FBI
Am
handed out @
staff meeting
Howard
1/10*

TO: District / Division Directors

FROM: 
Kirby Green, Deputy Secretary

RE: Anderson Columbia's Environmental Management System

On January 3, 2000, the Department agreed to accept the Anderson Columbia proposal for their environmental management system. Their plan updated December 23, 1999, met the requirements that were set forth in our settlement agreement. Their plan has become effective and the Department shall consider its implementation plan as reasonable assurance that Anderson Columbia will uphold Department standards and rules.

We have received your comments regarding the proposal and have worked to incorporate some of the more obvious changes. Issues regarding employee training and education, housekeeping procedures, quarterly inspections, and environmental self-audits have been provided in more detail in their December 23 proposal. Most of the comments received cited the generality and vagueness of the proposal; specific requirements will be developed during the permit process, and site specific BMP's will be developed at each facility.

The department should view this document as a work in progress and it has been explained to Anderson Columbia that changes in their management system should be made as the need arises. If you or your staff should discover changes that are needed please bring it to my attention for discussion.

KBG/cf

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 03-Jan-2000 08:09am

From: Melissa Meeker WPB 561/681-666
MEEKER_M@a1.depwpb.dep.state.fl.us

Dept:

Tel No:

To: See Below

Subject: Comments on Anderson Columbia policy

The following summarizes our comments on the proposal from AC. If you have any questions, please call.

We agree with Mimi that this proposal is lacking in substance. It may be appropriate for a "company policy" but it does not address the execution of the program. Hopefully the following will clarify what else we feel is needed.

There are probably two levels of training required, an advanced training for key plant personnel who are responsible for specific operations and a basic training for other employees. Although cross training is important and should be considered, each employee's training should focus on BMPs and SOPs that directly relate to the specific task they perform and should include instructions on handling all situations that could occur during the operation of their task.

An org chart should be supplied that identifies the general environmental responsibility of each individuals and the main point of contact for emergencies. A contingency plan, similar to what exists for RCRA, would be a good idea.

Key employees should be trained on ALL regulatory requirements, not just what the permit requires. This would include requirements for notification of releases or discharges, appropriate spill response procedures, and safety requirements.

Documentation of the training sessions should be required and should include, as an appendix, the specific material used in the training.

It would be appropriate to have a Standard Operating Procedure for each task identified in the policy and one for document tracking. The SOP should be site specific to address the needs of each facility.

There doesn't seem to be a way to identify and correct individual instances of noncompliance. A Preventive/Corrective Action procedure should be developed so that identified problems get promptly reported to someone who can fix them (not get reported on a form to be looked at a month later). How are violations reported to DEP? There isn't a definition of the individuals responsible for reporting violations.

Employees should be educated as to their "Whistle Blower Act" rights as part of the overall training.

A copy of the permit with conditions should be kept in an easily accessible locations for all employees to view at all times.

Data Sheet comments:

- 1) Daily production form for asphalt plants - place to mark visible emissions (other than is allowed out of the stack), i.e., around the dryer/drum mixer or from cracks. Any of these would require corrective action.
- 2) Type and % of asphaltic product should be identified daily. Some types are more of a compliance problem than others.
- 3) Type of fuel(s) received and used should be identified on the appropriate forms (could modify form provided).

Depending on the controls required by the permit for the crusher, one or more of the above checks may be needed on the appropriate forms for these units.

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INTEROFFICE MEMORANDUM

Date: 29-Dec-1999 09:20am
From: Richard Burns ORL 407/893-2353
BURNS_R@al.depor1.dep.state.fl.us
Dept:
Tel No:

Subject: Anderson Columbia's Environmental Training and Management Plan

Anderson Columbia's (AC) proposal for employee training and environmental management falls far short of the mark. As written, the proposal lacks the details and specifics essential to a viable Environmental Management System (EMS)

A number of examples of excellent general and industry specific EMSs can be found on Environmental Websites (e.g. EPA Home Page and search for EMS). Additionally, TREEO et alia have expertise in the development and implementation of EMS plans. AC should review these references and/or hire a consultant to develop a comprehensive EMS, that would include employee environmental training modules. In conjunction with the implementation of an EMS, AC should be encouraged to pursue ISO 14000 certification.

Providing the Department pertinent audit information in accordance with DEP Directive 922 is a positive feature of the proposal that should be incorporated in an AC EMS, but should be expanded to include the sharing (with regulatory agencies) of all EMS or ISO 14000 Audit results.

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 29-Dec-1999 02:14pm
From: CeCe Featheringill TPA 813/744
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To: Chris Flack TAL (FLACK_C@a1)
CC: Deborah Getzoff TPA (GETZOFF_D@a1.deptpa.dep.state.fl.us)
CC: James Cleary TPA (CLEARY_J@a1.deptpa.dep.state.fl.us)

Subject: Anderson Columbia Environmental Philosophy

The Southwest District has made an initial review of the documents you provided to us regarding Anderson Columbia's Internal Employee Education Program and Environmental Management System proposed plan. The plan appears minimal in content, at best, and is very vague regarding what their strategic issues and goals are. They have no real measurements of success and do not even mention Executive Management involvement regarding the implementation, reason for and need to adhere to this new environmental management system.

We are assuming that the quarterly inspection form that Anderson Columbia has proposed for use by their Environmental Coordinators will be reviewed by DEP field staff familiar with the facilities in question and address past noncompliance issues. The form seems too brief and generic.

EPA has some great information called Design for the Environment. DfE's goal is to assist businesses in incorporating environmental considerations into the creation of their products. The web address is <http://www.epa.gov/opptintr/dfe/>. In addition, if Anderson Columbia is committed to implementing these changes, it may be in their best interest to investigate the possibility of adopting ISO (International Organization for Standardization) practices. This could benefit Anderson Columbia from a business sense by providing safeguards for consumers regarding their products as well as providing the products in a more efficient, safer and cleaner manner. Information on ISO Standards can be found at <http://www.iso.ch/>. Perhaps this type of information would be helpful to Anderson Columbia in revising their plan.

Thanks for the opportunity to comment.

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 27-Dec-1999 03:26pm
From: Mimi Drew TAL 850/487-1855
DREW_M@a1.epicl.dep.state.fl.us
Dept:
Tel No:

To: See Below

Subject: Re: Anderson Columbia's Environmental Philosophy

My quick review of this proposal doesn't convince me that this is going to accomplish anything. If this is meant to be a serious training tool for staff, it is far too brief and general to accomplish anything. If it's meant to be more of a philosophy, the very first page should state the company's philosophy and explain that they take environmental issues seriously and discuss consequences if the guidelines aren't followed.

It's very important that the company develop specific management practices for the types of sites on which they work. It's not enough to just say that good management practices will be followed. And it's also important that the employees understand the practices and the reason why they are to be implemented.

I'm sure some company out there has a better model to use if Anderson can't come up with something more detailed. Or a consultant might help, for that matter.

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INTEROFFICE MEMORANDUM

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Date: 27-Dec-1999 02:35pm
From: Jon Iglehart FTM 941/332-6975
Jon.Iglehart@dep.state.fl.us
Dept:
Tel No:

To: Chris Flack TAL (Chris.Flack@dep.state.fl.us)

Subject: Anderson Columbia's Environmental Philosophy

Chris,

Rick Cantrell is out for the week, so I will respond for the office.

Overall the general sense of responsibility and checks for same appear appropriate. Our comments on the document are as follows:

The document does not assign responsibility for actions conducted by non-permanent workers.

The disposition of the daily logs is not clear. Submittal to the Department could create a large file of little value.

Disposition of the quarterly reviews is not clear. These perhaps should be submitted with a summary of the daily logs.

A copy of the company's employee directives should be attached to ensure the repercussions for failure to follow the company's environmental philosophy can be implemented.

The term "Quarterly inspections" denotes a sense that these inspections would be scheduled. Bringing each facility into strict compliance every three months for an internal inspection is commendable. However, a truer picture of the status quo could be achieved by an additional two or three unscheduled inhouse inspections annually. This could help to avert misunderstandings if the company's regular inspections and an unscheduled Department inspection conflict.

Thank you for the opportunity to comment.

Jon

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 29-Dec-1999 01:48pm
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KAHN_J@a1.epic1.dep.state.fl.us
Dept:
Tel No:

To: Chris Flack TAL (FLACK_C@A1)
CC: Clair Fancy TAL (FANCY_C@a1.epic1.dep.state.fl.us)

Subject: Anderson Environmental Education Program

Chris,

Clair and I looked over the information that you faxed to him and he asked me to send you our comments. Overall, this is more than we have required of most other permittees, so it represents somewhat of a new approach.

We noted that the inspection forms titled "Monthly Inspection Form" are referred to as "Quarterly Inspection Forms" on the attachments page and text, so this is inconsistent. Also, the inspection forms do not have any specific reference to air pollution sources. Since many of Anderson's facilities have air permits, it would be appropriate for the environmental coordinators to note compliance with the air permit conditions at each facility during their inspections. At a minimum, the forms should have a section to verify if visible emissions are noted from emissions units and fugitive sources.

The forms would also not be sufficient for any but the most basic material handling processes at the proposed Suwannee American Cement plant. This isn't a significant problem but we wanted to point this out. The processes and air pollution control equipment for the cement plant are much more extensive and complex than at any other source operated by the Anderson companies. Also, the regulatory requirements for the cement plant will be very complex. I imagine that a specific environmental plan will have to be developed for the plant by the applicant's air pollution consultant and the plant manufacturer, and it would be typical for a cement plant operator to have one person at the site that is primarily responsible for environmental compliance. At any rate, if the environmental management program is intended to cover the proposed cement plant, it will not be sufficient for that operation.

Please reply or call me at 921-9519 if you have any questions.

-Joe Kahn

**INTERNAL EMPLOYEE EDUCATION PROGRAM
AND
ENVIRONMENTAL MANAGEMENT SYSTEM**

A. INTERNAL EMPLOYEE EDUCATION PROGRAM

1. Notification of Permit Requirements.

The Company's Environmental Coordinator informs all employees at each facility about specific permit requirements prior to operation of a new facility or the relocation and/or renewal of a permit for an existing facility. The Environmental Coordinator conducts quarterly visits to the facilities to ensure permit requirements are met and to emphasize the importance of environmental compliance.

2. Training/Continuing Education.

a. Training/Education for New Employees.

The facility or plant manager provides each new employee at a permitted facility a copy of the Environmental Management System at the time of hire. The Environmental Coordinator or his designate interviews each new employee within 30 days of beginning work to ensure familiarity with and understanding of the employees responsibilities under the Environmental Management System. Every employee is made aware of the consequences of not abiding by the conditions of the permit, both on a company level and individually.

b. Training/Education for Existing Employees.

All permanent employees receive site-specific environmental training at least quarterly while working at a facility. This training is conducted prior to field activities at new sites and quarterly at existing sites. The importance of compliance with fundamental environmental issues (e.g. keeping the job site clean, preventing spillage of hydrocarbons, job site storage of petroleum/chemicals) is reinforced by the plant operator during weekly safety meeting. If isolated areas are observed that fail to meet the objectives, individual training with those employees is pursued. A training attendance log is kept on-site for verification of training. Training includes the following:

- Requirements of the permits: All employees are instructed as to what is required from the Company and how we are to achieve these requirements. The Company has incorporated a bound record keeping system, which is filled out by the Plant Operator daily. Included in these records are the requirements within the permit. A copy of this record attached.
- Good housekeeping procedures: General good housekeeping practices are emphasized, including prompt cleanup of any spilled or leaked material, proper storage of material, and appropriate disposal of trash and waste around the facility. Housekeeping and spill incidences (see below) are logged on our quarterly reporting form. Areas of concern are noted and discussed with the facility manager and responsible employees. Corrective actions are

INTERNAL EMPLOYEE EDUCATION PROGRAM
ENVIRONMENTAL MANAGEMENT SYSTEM

Page 2

formulated with a timeframe for resolution. Depending on the magnitude of the corrective action, a follow-up inspection may be performed the next day or during the next inspection.

- Spill response procedures: Contingency measures are discussed to ensure against accidental discharge. Areas of potential spillage, such as the fuel truck off-loading area, are discussed with emphasis placed on response measures and the reporting requirements if such a spill does occur.
- Regulatory Issues: Identification of changes in permits and regulatory laws are communicated promptly.

B. ENVIRONMENTAL MANAGEMENT SYSTEM

1. Environmental Philosophy.

We are committed to conducting business in a manner conducive to promoting the welfare of the environment. This commitment is consistent with our corporate objectives and is essential to sustainable business success. Our goal is to produce products and perform projects in an environmentally responsible manner. To achieve this goal, we have established the following environmental philosophy. All management employees are required to support this philosophy in accordance with their roles and responsibilities in the organization and to ensure that all employees understand and adhere to the philosophy.

- We design our product manufacturing facilities to meet all air and water regulations and maximize the use of recycled products to the extent possible while maintaining environmental quality and compliance.
- We conduct our operations in a manner that prevents pollution, conserves resources and proactively addresses past environmental problems.
- We integrate environmental management into our business and decision-making processes, and regularly measure our performance.
- We ensure our operations comply with environmental regulations and requirements.
- We provide clear and candid environmental information about our operations to regulatory bodies.
- We inform suppliers of our environmental requirements and encourage them to adopt sound environmental management practices.
- We foster environmental responsibility among our employees.
- We contribute constructively to environmental public policy.

Effective Date: December 1999

**INTERNAL EMPLOYEE EDUCATION PROGRAM
ENVIRONMENTAL MANAGEMENT SYSTEM**

Page 3

2. Environmental Coordinators.

Environmental Coordinators have been designated to oversee compliance with the environmental philosophy, permit conditions and education requirements of the Environmental Management System. The Environmental Coordinators are duly qualified by education, training or experience in performing the responsibilities set forth herein. Resumes for the Environmental Coordinator and the Assistant Environmental Coordinator are attached.

3. Quarterly Environmental Inspections of Field Operations.

Quarterly inspections are used to identify any potential problems with facility equipment or site improvements and to ensure the effectiveness of the training. The Environmental Coordinators conduct these inspections while the facility is in operation. Each stationary facility has a set of site-specific Best Management Procedures (BMP's) based upon the site's geographic and environmental characteristics. Inspections verify that the BMP's are followed and generally address the following areas:

- Material handling areas
- Aboveground storage tanks
- Asphalt plant including hoppers and baghouse.
- Stormwater controls
- Record keeping

The Environmental Coordinators inspect facilities on a quarterly basis to ensure the requirements of the permit are met and to assess the effectiveness of the training. Any deficiencies are discussed with the plant manager. At the end of each inspection, corrective actions for noted problems are discussed. A copy of the inspection form is left on-site for the Plant Operator. The implementation of each corrective action is reviewed during the next inspection to ensure that the problem has been resolved. A copy of the inspection forms is attached. Significant compliance issues are discussed with the FDEP to provide reasonable assurance that corrective actions have, or will be implemented.

4. Environmental Audit Program.

We adhere to an environmental audit program that is consistent with DEP directive No. 922. Audits. The audits will be performed quarterly as described above. Environmentally sensitive areas may be checked on a bi-weekly to monthly basis. No prior notice is given to the site personnel as to the time of the audit. Most audits will have supporting photographic documentation. The audits will entail issues detailed in the permits for the site, housekeeping, stormwater, air, etc. The audit is reviewed with the site supervisor and his/her signature is required to verify that the compliance issues and their resolutions are understood. A time frame for the corrective actions is given. Significant compliance issues are discussed with the FDEP, as required in the general conditions of the permit. During the next audit, corrective actions are reviewed to confirm compliance.

Effective Date: December 1999

INTERNAL EMPLOYEE EDUCATION PROGRAM
ENVIRONMENTAL MANAGEMENT SYSTEM

Page 4

5. Statement of Employee Responsibility for Implementing Environmental Philosophy.

The Environmental Coordinators familiarize the facility managers at each regulated site with the contents of all applicable permits. These facility managers are responsible on a daily basis for ensuring that the terms of permits are met. All employees receive site-specific environmental training while working at a facility. Employees are informed that the consequences of failing to comply with the Environmental Philosophy will result in disciplinary action including possible termination of employment.

Effective Date: December 1999

Best Management Practices Plan (Example)

This example plan has been prepared to show our BMP's at a typical asphalt plant for Anderson Columbia Co., Inc. When implemented, this plan shall become part of the daily routine of the plant manager, or their representative, to ensure that the plant operations are environmentally sound.

Responsible Persons:

The plant operator is responsible for the implementation of this plan. Plan review and oversight is conducted by the Environmental Manager or his designee.

Housekeeping:

Required good housekeeping practices to be followed include prompt cleanup of any spilled or leaked material, proper storage of material and disposal of trash and waste around the site. Listed below are areas of special concern.

- **Dumpster/Trash Cans** – A dumpster and/or covered trash cans are provided for the disposal of trash. Sites are kept free of litter at all times.
- **Secondary Containment** – Spilled material outside or inside the containment area is cleaned up immediately. Sorbent material is kept on-site for use as necessary. Used sorbent is drummed for proper off-site disposal.
- **Fueling Areas** – Areas are checked daily for drips from fueling activities. Sorbent material is kept at this location. Bioremediation media "bacteria" is kept on-site to spray on spill areas.
- **Vehicle/Equipment Parking** – Any stained soil in these areas is promptly cleaned up.
- **Drum Storage** – All drums are stored in a drum storage area. Drum leaks are cleaned up immediately and the drum disposed of properly.
- **Asphalt Plant** – Particular attention is paid to the small containment areas below the small diesel tank at the end of the liquid asphalt tank. Sorbent or sorbent pads are used to remove any drips collecting here.

Best Management Practices, (Example)

Preventive Maintenance:

Daily inspections are made by the plant manager, or his representative, and are performed to identify any potential problems with facility equipment. Maintenance of the batch plant is performed according to manufacturers recommendations.

Spill Response:

All site personnel receive training in spill response procedures. This training includes identification of materials of concern, properties of these materials from MSDS's, their location, the predicted flow direction, cleanup procedures and the location of response equipment.

Material Handling and Storage Areas:

Daily inspections are made to confirm that fugitive emissions (dust from site) are not leaving the site. If fugitive emissions are a problem, wet the problem areas with a water truck. Confirm that the material storage piles are kept at least 10 to 20 feet from the property boundary.

Management of Runoff/Sediment and Erosion Control:

During rainfall events, the property boundaries are checked to confirm that no on-site stormwater exits the site. Berms and stormwater controls are checked monthly to ensure they are in operational order.

Inspections:

At least quarterly inspections of the facility are performed by the Company's Environmental Manager to ensure the effectiveness of the BMP's and to identify conditions with the potential to contribute pollutants to the environment. These inspections are conducted while the facility is in operation and will include the following areas:

- Materials handling and storage areas.
- Aboveground storage tanks.
- Batch plant including hoppers, silos and baghouses.

Training:

All employees receive quarterly BMP training. Training includes the following:

- Goals and objectives of the BMP's.

Best Management Practices, (Example)

- Good housekeeping procedures.
- Materials handling procedures.
- Spill response procedures.

Recordkeeping and Reporting:

Copies of the Inspection Reports are kept on-site in the facility control room.

BEST MANAGEMENT PRACTICE IDENTIFICATION

Purpose: Describe General Best Management Practices for the facility. An overview for each BMP is discussed below that are incorporated into facility operations.

BMP's	Brief Description of Activities
Good Housekeeping	Train staff in proper disposal of waste materials, cleanup procedures and proper materials labeling and storage. Promptly cleanup any spills. Report any leaks or faulty equipment at the fueling or liquid asphalt storage areas. Patrol facility yard and pick up garbage.
Preventive Maintenance	Properly maintain all facility equipment and systems. Inspect diesel fuel and liquid asphalt storage tanks for faulty equipment. Promptly repair or replace and defective equipment. Document all repairs..
Visual Inspections	Visually inspect the facility daily (when operational) to identify conditions which may contribute, or have the potential to contribute, to the contamination of storm water runoff or groundwater.
Spill Response and Response	Identify areas where spills/leaks are most likely to occur. Familiarize yourself with proper spill response equipment. Know where spill response call numbers are kept.
Sediment and Erosion Control – Management of Runoff.	Check site weekly to ensure that stormwater features are in good condition. During significant rainfall events, check to confirm that no stormwater runoff from site leaves property.
Site –Specific BMP's	

BEST MANAGEMENT PRACTICE IMPLEMENTATIONS CORRECTIVE ACTION SCHEDULE

Instruction: Provide a brief description of the steps necessary to implement the Corrective Actions, a schedule for completing these steps, and the personnel responsible for implementation.

BMP's	Description of Corrective Actions	Schedule for Completion	Responsible Personnel	Notes
Good Housekeeping	1)			
	2)			
	3)			
	4)			
Preventive Maintenance	1)			
	2)			
	3)			
	4)			
Visual inspections	1)			
	2)			
	3)			
	4)			
Spill Prevention and Response	1)			
	2)			
	3)			
	4)			
Sediment and Erosion Control	1)			
	2)			
	3)			
	4)			
Management of Runoff	1)			
	2)			
	3)			
	4)			
Miscellaneous or Site-Specific BMP's	1)			
	2)			
	3)			
	4)			

January 3, 2000

Mr. Joe Anderson
Anderson Columbia Co., Inc.
Post Office Box 1829
Lake City, Florida 32056

Dear Mr. Anderson:

The Department of Environmental Protection has received a copy of Anderson Columbia's Internal Education Program and Environmental Management System and reviewed it for content. The plan submitted and dated to become effective December 1999, with additional changes submitted December 23, 1999, meets the requirements set forth in our settlement agreement.

The Department approves the proposal and considers implementation of the plan as reasonable assurance that your corporation will resolve to uphold Department standards and rules. The Department also views this plan as a change in your corporate philosophy, expecting that the protection of the environment and the health and safety of the public, are issues that will surface in your corporate decision making. The Department views this proposal as a working document and would anticipate changes being made as needed.

We look forward to working closely with you in the future, feel free to contact my office for any help or information that you may need.

Sincerely,

Kirby B. Green, III
Deputy Secretary

KBG/cfr



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 23 1999

RECEIVED

DEC 29 1999

BUREAU OF AIR REGULATION

4 APT-ARB

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Preliminary Determination and Draft PSD Permit for Suwanee American Cement
Company located in Branford, Florida (PSD-FL-259)

Dear Mr. Linero:

Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for Suwanee American Cement Company dated November 18, 1999. The draft PSD permit is for the construction of a dry process preheater/precalciner type portland cement plant. Total emissions from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), volatile organic compounds (VOC) and particulate matter (PM/PM₁₀).

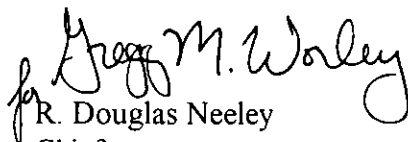
We have reviewed the preliminary determination and draft PSD permit for Suwanee American Cement and discussed the project with the Florida Department of Environmental Protection. Please consider the following comment as you develop a final permit for the project.

Section III, Condition 13 sets a limit on the mass of mercury compounds entering the system at 184 pounds per consecutive 12 months. This limit seems to be derived from the emission calculations in section 13 of the permit application addendum dated February 1999. The emission calculation used an AP-42 emission factor assuming the kiln would utilize an electrostatic precipitator. Since the kiln will now use a baghouse to control emissions, we suggest updating the emissions calculation to reflect the use of the correct emission factor. Our calculations estimate emissions at approximately 20 pounds of mercury per year. We suggest that Condition 13 be changed to reflect this reduction in mercury emissions and to impose an emission limit instead of a mass input limit.

3

Thank you for the opportunity to comment on the Suwanee American Cement Company's preliminary determination and draft PSD permit. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,



R. Douglas Neeley

Chief

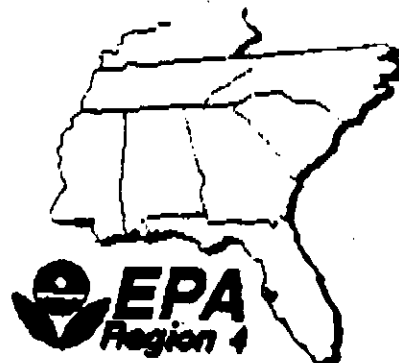
Air and Radiation Technology Branch

Air, Pesticides and Toxics

Management Division

CC: F. Koesten, SAC Co
Koester & Assoc
NPS
NED
J. Kahn, BAR

J. Chisolm, OGC
L. Sellers, HEK



facsimile
TRANSMITTAL

Mississippi, Tennessee, Alabama, Georgia, Florida, Kentucky,
South Carolina, North Carolina

To: Joe Kahw
FDEP

Fax #: 850-922-6979

Subject: Suwanee American Cement Co.

From: Kathy Farney

Phone#: 404-562-9130

Date: 12-23-99

Pages: 3, including this cover sheet.

COMMENTS:



Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street, SW, 12th Floor
Atlanta, Georgia 30303

404-562-9106
Fax: 404-562-9086



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 23 1999

4 APT-ARB

Mr. A. A. Linero, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

SUBJ: Preliminary Determination and Draft PSD Permit for Suwanee American Cement Company located in Branford, Florida (PSD-FL-259)

Dear Mr. Linero:

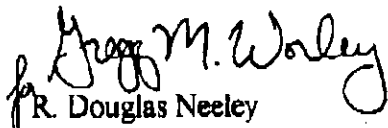
Thank you for sending the preliminary determination and draft prevention of significant deterioration (PSD) permit for Suwanee American Cement Company dated November 18, 1999. The draft PSD permit is for the construction of a dry process preheater/precalciner type portland cement plant. Total emissions from the proposed project are above the thresholds requiring PSD review for nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), volatile organic compounds (VOC) and particulate matter (PM/PM₁₀).

We have reviewed the preliminary determination and draft PSD permit for Suwanee American Cement and discussed the project with the Florida Department of Environmental Protection. Please consider the following comment as you develop a final permit for the project.

Section III, Condition 13 sets a limit on the mass of mercury compounds entering the system at 184 pounds per consecutive 12 months. This limit seems to be derived from the emission calculations in section 13 of the permit application addendum dated February 1999. The emission calculation used an AP-42 emission factor assuming the kiln would utilize an electrostatic precipitator. Since the kiln will now use a baghouse to control emissions, we suggest updating the emissions calculation to reflect the use of the correct emission factor. Our calculations estimate emissions at approximately 20 pounds of mercury per year. We suggest that Condition 13 be changed to reflect this reduction in mercury emissions and to impose an emission limit instead of a mass input limit.

Thank you for the opportunity to comment on the Suwanee American Cement Company's preliminary determination and draft PSD permit. If you have any questions regarding these comments, please direct them to either Katy Forney at 404-562-9130 or Jim Little at 404-562-9118.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Douglas Neeley". The signature is written in a cursive style with a large, looped "N" at the end.

R. Douglas Neeley
Chief

Air and Radiation Technology Branch
Air, Pesticides and Toxics
Management Division