



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

RECEIVED

JUN 23 1999

BUREAU OF
AIR REGULATION

KA 624-98-01

June 22, 1999

Mr. Joe Kahn
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Suwannee American Cement Company
Suwannee County, Florida
Particulate Matter Control Efficiency
Guarantees for Kiln and Cooler ESPs

Dear Joe:

In response to your recent verbal request for clarification on matters related to the performance guarantees for particulate matter control on the kiln and cooler ESPs, I have contacted both Polysius and Environmental Elements and have received the attached correspondence from Environmental Elements related to the performance guarantees. The attached correspondence dated June 17, 1999, confirms a particulate matter concentration guarantee in the gas stream discharged from the cement kiln ESP while operating in both directing compound modes of 0.007 grains per actual cubic foot. The correspondence also upgrades the guarantee on the clinker cooler ESP to 0.007 grains of particulate matter per actual cubic foot. The original guarantees from Environmental Elements dated December 16, 1998, which have been provided to you, guaranteed the performance of the kiln ESP at 0.007 grains per actual cubic foot but guaranteed the performance of the clinker cooler at only 0.01 grains per actual cubic foot. These guaranteed discharge concentration limits, when combined with the associated design stack gas flow rates, were consistent with the particulate matter limits proposed as BACT by Suwannee American Cement at that time (0.17 lb PM10/ton dry preheater feed for the kiln and 0.09 lb PM10/ton dry preheater feed for the cooler).

Mr. Joe Kahn
Florida Department of
Environmental Protection

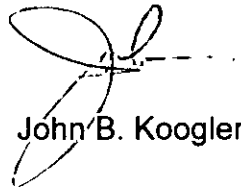
June 22, 1999
Page 2

In correspondence to the Department in February 1999 and in response to a Department suggestion, Suwannee American Cement reduced the BACT PM10 emission limits for the kiln and raw mill to 0.11 pounds per ton of preheater feed and from the cooler to 0.06 pounds per ton of preheater feed. The reduced emission limit for the clinker cooler, representing Suwannee American Cement's proposal for BACT, required the updated guarantee from Environmental Elements for the cooler ESP. The guarantee provided by Environmental Elements in December 1998, and confirmed in the attached correspondence, is consistent with the reduced particulate matter emission limit proposed by Suwannee American Cement for the kiln and raw mill. See attached summary sheet confirming the consistency between BACT limits and ESP guarantees.

If there are further questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:wa
Enc.

c: Mr. Frank Darabi



**PROPOSED PM BACT EMISSION
LIMITS AND ESP GUARANTEES**

**SUWANNEE AMERICAN CEMENT
SUWANNEE COUNTY, FLORIDA**

KILN/RAW MILL

Proposed BACT PM10 limit = 0.11 lb/ton feed

Preheater feed = 163 tph

PM10 Emission Limit = 0.11 lb/ton x 163 tph
= 16.3 lb/hr

Guarantee @ 0.007 gr/acf

Compound Mode:

Gas flow = 194,000 acfm
PM Emissions = 11.6 lb/hr

Direct Mode:

Gas flow = 200,000 acfm
PM Emissions = 12.0 lb/hr

COOLER

Proposed BACT PM10 limit = 0.06 lb/ton feed

Preheater feed = 163 tph

PM10 Emission Limit = 0.06 lb/ton x 163 tph
= 9.8 lb/hr

Guarantee @ 0.007 gr/acf

Gas flow = 160,000 acfm
PM Emissions = 9.60 lb/hr

ENVIRONMENTAL ELEMENTS

C O R P O R A T I O N

SINCE 1848

3700 KOPPERS STREET · BALTIMORE, MARYLAND 21227 · TELEPHONE 410-368-7000

Hamilton G. Walker, Jr.
Director, National Account Sales
Email: hgwalker@eeo1.com
Telephone: 410 368 7046
Fax: 410 368 6721

VIA TELEFAX
770 955 8789

June 17, 1999

Mr. Joerg Teichert
Polysius Corporation
180 Interstate North Parkway, NW
Atlanta, Georgia 30339-2194

Reference: EEC Proposal 98-12-16428-R2110E-FA
Suwannee American Cement

Dear Mr. Teichert

Confirming our telephone conversation today, Environmental Elements Corporation hereby amends its proposal referenced above as follows:

- Page 4:1 We confirm that the guaranteed outlet particulate residual is 0.007 gr/ACF in both direct and compound service as shown in the proposal.
- Page 4:2 For the clinker cooler, the guaranteed outlet particulate residual is changed to 0.007 gr/ACF.

All other terms and conditions of the original proposal remain unchanged.

Please call if we can be of further service. We look forward to working with you on this project.

Sincerely,

Hamilton G. Walker, Jr.
Director, National Account Sales

cc:
Mr. Jack Locke – Energy & Environmental Technologies, Inc.
Don Hug
Bob Brown





Suwannee American Cement Co. Inc.

P.O. Box 38
Old Town, FL 32680

Phone: 352 542-7942 FAX: 352 542-3417

XC: CLAIR
Joe K
6/21

June 15, 1999

State of Florida
Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400
Attention: Mr. Howard L. Rhodes

RECEIVED

JUN 21 1999
DIVISION OF AIR
RESOURCES MANAGEMENT

Dear Mr. Rhodes:

As you know, our letter of 10 June included the following:

1. Resumes of Chuck Yagel and myself.
2. Draft Organizational Chart for the plant.
3. Key position job descriptions.
4. Listing of Plant Consultants.

RECEIVED

JUN 21 1999
BUREAU OF
AIR REGULATION

Upon further review of these documents, we have realized that certain further modifications and clarifications are in order.

As we assured you during our meeting last week, Chuck Yagel and I are providing the primary expertise and direction for this new state-of-the-art facility. In light of recent events, we now realize that this may not provide you with adequate assurance of the continued proper operation and maintenance of the plant. Consequently, the Anderson family has decided to relinquish all direction of Suwannee American Cement.

We would like to advise you that I am now the President of Suwannee American Cement, and Chuck Yagel is the Vice President of Operations. We have been tasked only with the direction of Suwannee American Cement, and have no prior history in any function with the Anderson Family. We are fully and solely committed to the efficient and environmentally responsible operation of Suwannee American Cement.

Throughout our careers in the cement industry, we have maintained good reputations for environmentally responsible operations, and it is our firm personal commitment to maintain that record. In order to fulfill that goal, we will staff our company with only the most qualified personnel who share our vision of environmental excellence.



As you know, we are not yet able to assign names to any of the positions we have defined in our organization. As we progress farther in our project, we will recruit the most competent personnel available in the cement industry to fill all critical positions. As a matter of fact, even the Organizational Chart is only preliminary, since it may change significantly in order to best avail ourselves of special talents various people within the industry could bring us.

We have modified our Draft Organizational Chart to reflect our new structure. A copy of this revised document is attached.

Additionally, I have modified my resume to better describe the job duties of the positions I have held.

In reviewing our previous submittal, I realize we failed to properly address the duties of the Environmental Compliance Officer. Considering the sensitivity and importance of this position, we have elaborated on the position in our Key Job positions submittal. A revised copy is attached.

We remain highly sensitive to the need to protect the pristine nature of the Ichetucknee River. While we are fully confident that our plant will not adversely affect this wonderful natural resource, we realize many people may remain apprehensive. Accordingly, we will initiate and maintain a public liaison office that will respond to all public queries and concerns in a timely manner. Further, we will list the telephone number of at least one responsible contact individual within Suwannee American Cement, who will be available at any time to respond to public concerns.

We trust this additional information will provide further reassurance that Suwannee American Cement will be a good neighbor dedicated to preserving the environment with all its natural beauty.

Should you have any further questions, please don't hesitate to call either Chuck Yagel or me.

Sincerely,

A handwritten signature in black ink, appearing to be 'C. Yagel', is located below the word 'Sincerely,'.

Signed by Chuck Yagel for
Fred W. Koester
President
Suwannee American Cement

Enclosures

KEY POSITION JOB DESCRIPTIONS

PLANT MANAGER

Has the responsibility for plant operations and maintenance. Has the authority to expend funds and take any necessary actions to assure a safe, efficient and environmentally responsible plant operation.

PRODUCTION MANAGER / ENVIRONMENTAL COMPLIANCE OFFICER

Reports directly to the plant manager. Is responsible for the day to day operation of the plant. Has operational authority over all plant equipment and is the Environmental Compliance Officer.

The Environmental Compliance Officer, in conjunction with the Plant Process Engineer-has responsibilities and duties as follows:

- Has complete responsibility for plant compliance with all emissions permit requirements
- Directs and is responsible for calibration of all plant emissions monitoring equipment and instruments
- Directs and is responsible for acquisition of all data required for environmental monitoring and emissions control performance reporting
- Directs maintenance of equipment for remote real-time monitoring of plant emissions data.
- Has the authority to expend necessary funds for emissions compliance related issues.
- Provides liaison with DEP on all compliance-related matters.

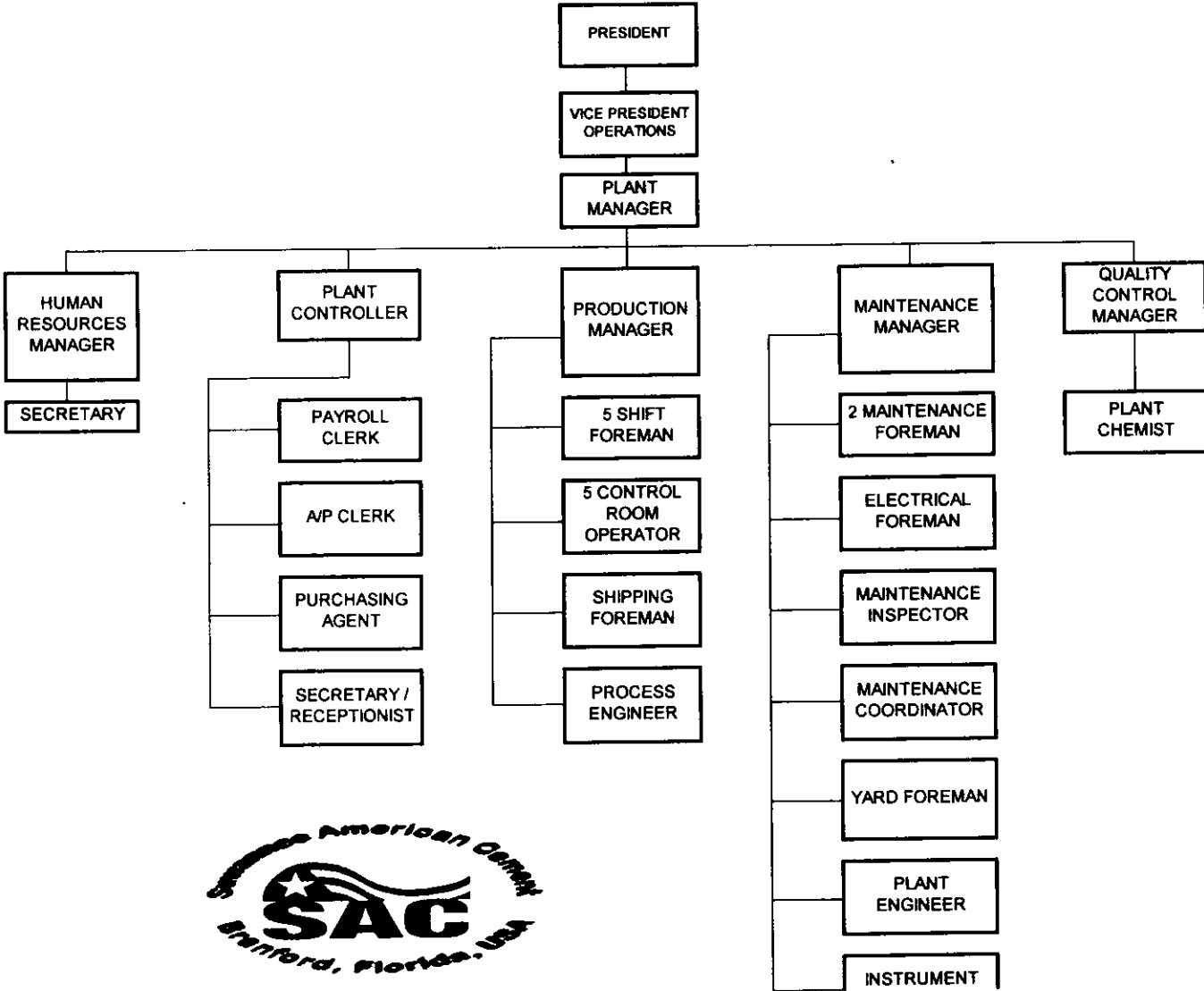
MAINTENANCE MANAGER

Reports directly to the plant manager. Is responsible for the short and long term equipment maintenance as well as plant cleanliness. Has the authority to expend funds necessary to assure equipment integrity and maintain an adequate spare parts inventory.

QUALITY CONTROL MANAGER

Reports directly to the plant manager. Is responsible for product quality to assure compliance with cement specifications. Has the authority for material control and release of product for shipment.

Suwannee American Cement
DRAFT ORGANIZATIONAL CHART



FRED W. KOESTER

PRESIDENT

- Retired and Consultant to Lafarge Corporation, Great Lakes Region, July 1994
- **Lafarge Corporation, Great Lakes Region:** President and Senior Vice President, Lafarge Corporation, May 1992

Operations/Marketing/Profit & Loss responsibility for six cement plants with annual revenues of \$400,000,000.
- **Lafarge Corporation, Southern Region:** President and Senior Vice President, Lafarge Corporation, February 1987

Operations/Marketing/Profit & Loss responsibility for six cement plants with annual revenues of \$350,000,000.
- **General Portland Inc.:** Executive Vice President, April 1985

Full responsibility for 5 of 9 operating divisions of the company
- **General Portland Inc.:** Senior Vice President, August 1984

Full responsibility for 4 of 9 operating divisions of the company
- **General Portland Inc.:** Senior Vice President-Operations, April 1982
- **General Portland Inc.:** Vice President and General Manager, Trinity North Division, May 1981
- **General Portland Inc.:** Director-Preheater Plants Projects, June 1977
- **General Portland Inc.:** Director-Maintenance Planning, January 1977
- **General Portland Inc.:** Operations Manager, Trinity Division, 1975
- **General Portland Inc.:** Plant Manager, Fort Worth, 1973
- **General Portland Inc.:** Assistant Plant Manager, Houston, 1972
- After 11 years in various cement industry operations positions, joined General Portland as Maintenance Manager, Paulding Plant, in 1970

BSME, Marquette University

LAW OFFICES

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

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M. CHRISTOPHER BRYANT
C. ANTHONY CLEVELAND
TERRY COLE
SEGUNDO J. FERNANDEZ
DANIEL W. HARTMAN
KENNETH F. HOFFMAN
KENNETH G. OERTEL
PATRICIA A. RENOVITCH

*Copies Joe K - OGA
6/21/99
claim
Howard
6/21*

June 17, 1999

RECEIVED

JUN 18 1999

**DIVISION OF AIR
RESOURCES MANAGEMENT**

Howard L. Rhodes, Director
Air Resources Management
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2600

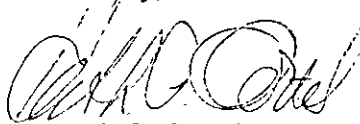
RE: Suwannee American Cement Company, Inc.
Permit Application No. 1210465-001-AC

Dear Mr. Rhodes:

Recently I met with Perry Odom and Kirby Green regarding the above-referenced application. They indicated the Department believed the deadline for issuing a Notice of Intent was rapidly approaching. I have not calculated on my own what the actual deadline is, but in order to relieve any doubt, I have been authorized by my client to agree to a 30-day extension from any deadline to make sure the Department is satisfied it has available time to adequately explore permit conditions with Suwannee American.

I believe it would be fruitful for the applicant to meet with the Department to discuss areas where the Department has questions regarding Suwannee American's commitment to protecting the surrounding environment from any discharges which would originate from the facility. As you know, we have proposed to install additional monitoring equipment and post a surety bond to guarantee compliance. My brief meeting with Kirby Green and Perry Odom makes me believe it would be worthwhile for us to discuss this in more detail. In order to do that and not run the risk of a deadline inadvertently passing, I have been authorized to waive any permit deadline, including those that appear in s. 120.60, F.S., for a period of 30 days beginning on June 21, 1999. This waiver will extend until July 21, 1999, and should be interpreted as tolling the running of any deadline that might expire during this period.

Yours truly,



Kenneth G. Oertel

- c: Kirby Green
- Perry Odom
- Fred Koester
- Jim Eaton
- John Koogler

RECEIVED

JUN 21 1999

**BUREAU OF
AIR REGULATION**



**facsimile
TRANSMITTAL**

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

To: Joseph Kahn
FDEP
850/921-9519

Fax #: 850/922-6979

Subject: Cement Plants - North Florida,
Letter from Dave Bruderly

From: Stan Kukier Phone#: 404/562-9140

Date: 6/15/99

Pages: 7, including this cover sheet.

COMMENTS:

(FYI)

Do you have or received any additional information? We are in the process of preparing a response for RA's signature.
Thanks,



Air & Radiation Technology Branch
U.S. Environmental Protection Agency
61 Forsyth Street, SW, 12th Floor
Atlanta, Georgia 30333

404-562-9106
Fax: 404-562-9095



BRUDERLY ENGINEERING ASSOCIATES, INC.

31 May, 1999

Mr. John Hankinson
 Regional Administrator
 US Environmental Protection Agency
 The Federal Center
 100 Alabama Street SW
 Atlanta GA 30303

Dear John,

I am writing to ask for USEPA help to protect ecosystems, not to mention air and water quality, from significant degradation throughout North Florida. Alachua County and tens or thousands of concerned citizens are fighting a holding action against efforts by the cement industry to use every procedural opportunity to side step the intent of the National Environmental Policy Act (NEPA), the Clean Air Act, and the Clean Water Act.

Specifically, I'm asking for the following assistance:

- Technical support to help Alachua County and Florida Rock Industries (FRI) find innovative ways to retrofit and reduce criteria air pollution (fine particulate and nitrogen oxides) from their new Alachua County cement plant.
- Technical support to help Suwannee American Cement Company (SAC) find a new site for their proposed Suwannee County cement plant — a site that does not threaten the Ichetucknee State Park and the Ichetucknee, Santa Fe, and Suwannee Rivers.
- Technical support to help FRI and SAC design, build, and operate the cleanest and most efficient cement plant(s) in the world in Hernando and Suwannee counties.
- Technical review of the impacts from Greenhouse Gas (GHG) emissions from all cement plants in Florida.

North Florida is on track to become a major production center for Portland cement. Yet amazingly, the protections normally offered by NEPA have been ignored. Nobody knows the cumulative environmental impacts this new industry will have on the culture and economy of local communities, on ambient air or water resources, on sensitive ecosystems, or on human health and welfare.

Three new green field facilities are under construction or planned in this region:

1. In Alachua County, FRI plans to place a 700,000 ton per year kiln in operation later this year — assuming the company obtains their Title V permits;
2. In Suwannee County, SAC has submitted permit applications to construct a larger kiln — directly adjacent to the Ichetucknee Springs State Park; and
3. In Hernando County, FRI recently announced plans for a second kiln near Brooksville that will repeat all the same planning and design mistakes.

Three Major New Sources of Pollution are Planned for North Florida.

Combined nitrogen oxide emissions from these three plants will exceed 5,000 tons per year. In addition, emissions from off-road equipment and truck traffic created by these plants will be nearly as large -- unfortunately these emissions have not been evaluated. These new stationary and mobile sources of air pollution will have a significant impact on ambient concentrations of ozone and fine particulate throughout North Florida. These pollutants -- plus noise, light, and other emissions from these facilities threaten the ambiance and the overall quality of life in several rural communities.

Environmental Impacts are Unknown

Unfortunately, the impacts of the emissions from these three new facilities are unknown. No comprehensive environmental assessments have been conducted. Even effects on local and regional air quality -- especially ozone, toxics, and fine particulate -- are unknown. Impact assessments prepared by the companies have been *de minimis* and based solely on literature review and simplistic and poorly documented assumptions.

For example, in spite of repeated public concerns and requests for factual, site-specific data and impact assessment, site specific impact assessments have not been conducted. There have been no health effects studies, no emission budgets, no fate and effects assessment of mercury, dioxins, nor other combustion-derived toxics.

Site Specific Ambient Air Quality Data is Not Available

Pre-construction baseline ambient air quality monitoring has not been required by FDEP nor submitted for either the Alachua and Suwannee County PSD permit applications. The companies claimed exemption from ambient air quality monitoring requirements under the *de minimis* volatile organic compound (VOC) thresholds. The FDEP granted this exemption in spite of the fact that it is well established that nitrogen oxides are the limiting reactant in the formation of ozone in this region.

In effect, the companies claimed exemption from baseline ambient ozone and fine particulate monitoring because there is no explicit requirement under Florida law to do so. As a result, major new sources of air pollution are proposed without the benefit of an adequate database of pre-construction and pre-operation air quality data for ozone and fine particulate.

No Site-Specific Health Effects or Ecological Impact Analysis Has Been Done

This *de minimis* behavior has been consistent throughout the PSD permitting process. FRI and SAC each claim that emissions from their plants will not cause harm to the community. They have used simplistic assumptions and models to support their claims that emissions will not degrade ambient air quality in North Florida. But they have not provided hard evidence to substantiate these claims. The companies are using the legal controversy over the new National Ambient Air Quality Standards (NAAQS) to avoid rigorous analysis of both baseline air quality and impacts. No site-specific database of ambient fine particulate or ozone air quality measurements exists. For this reason,

emission impacts on ambient fine particulate and ozone levels have never been rigorously evaluated against the current or proposed NAAQS.

The failure of the FDEP to require collection of site-specific ambient air quality data has effectively neutralized attempts by the public to obtain answers to legitimate public concerns. Since site-specific local data is not available, the companies have been able to use general data and simplistic assumptions to model air quality impacts and justify conclusions that there are no adverse impacts.

Last month, FDEP stated that they intend to approve the plant proposed for Suwannee County. We encounter here the same problem faced by Alachua County. Impacts have not been evaluated and the technology proposed is not the cleanest and most efficient available. Dilution is the solution to the pollution created by these new sources.

The PSD Permit Process has Not Protected Alachua County

The Alachua County Commission believes that FRI may have misled the public and local planning officials in early public disclosures about the size of the project and its impacts on the local community. FRI easily obtained local land use approvals because the company understated the quantities of emissions from their proposed facility when it applied for a Special Use Permit. At the time, the County deferred judgement on air quality issues to the FDEP and USEPA.

FRI subsequently applied for – and received – permission to emit significantly higher emissions in the PSD air quality permit application submitted to the FDEP. The FDEP issued an air construction permit allowing FRI much higher emissions, contradicting its earlier promise to Alachua County. The FRI facility is scheduled for operation later this year. The Commission can provide you with precise dates and emission estimates that were made.

Alachua County wants the Cement Industry to Use State-of-the-Art Technologies

The Alachua County Commission has asked FRI to comply with the low emission estimates originally submitted to the County with the Site Plan Application. In part because FRI failed to evaluate accurately impacts from the higher emissions granted in the PSD permit, the Commission believes requiring FRI to conform to its original estimates is necessary to protect the health, safety, and welfare of the community. The pollutants of critical concern are fine particulate, nitrogen oxides, and products of incomplete combustion. FRI claims that it is not technically and economically feasible for their kiln in Alachua County to meet the lower emission levels.

However, I have learned that innovative combustion process and technologies have been developed that create much lower emissions. If used, these readily available technologies could significantly reduce emissions from the manufacture of cement. One technology in particular, the use of pure oxygen to replace combustion air, offers significant reductions of nitrogen oxide and particulate emissions. Had the FRI kiln been designed from the outset to use pure oxygen, I believe that it would be possible for FRI to meet the emission levels initially proposed to the County.

Industrial Ecology and Brownfield Concepts Must be Used to Reduce Pollution

Other opportunities to reduce or prevent pollution from new cement kilns derive from the use of concepts from the emerging science of industrial ecology. For example, cement kilns located adjacent to steel mini-mills, can reduce energy consumption and emissions significantly due to the synergistic reuse of waste materials, such as slag and fly ash, and energy recovery. Co-location also has the beneficial effect of concentrating heavy industry in appropriate brownfield locations rather than greenfield sites in sensitive communities.

Unfortunately, innovative management approaches, scientific site selection, and use of advanced process and production technologies have been rejected by FRI and SAC and the State of Florida. The companies claim that use of state-of-the-art technologies is simply not economically feasible in the United States cement industry.

The Public Suffers While FRI and SAC Learn How to Make Cement

Neither FRI nor SAC have experience in the manufacture of cement. As a result, the companies have no demonstrated record of performance. Public disclosures have not assured the public that they know how to control emissions or understand the impacts their facilities will have on the health, safety, and welfare of the people who are their neighbors. Nor do the companies understand or appreciate the sensitivity and value of the pristine water resources and ecosystems that are unique to North Florida.

Neither FRI, SAC, nor their agents have shown the willingness to design and build facilities that use the most efficient and cleanest available technologies. As a result, the citizens and ecosystems of North Florida will suffer unknown impacts while these neophyte companies learn how to make cement with inadequate or obsolete technologies. These policies are unacceptable.

A Cluster of Three Obsolete Cement Plants is a National Problem

The Alachua County Commission is standing alone in an attempt to hold FRI to the emission limits pledged when it first applied for a Special Use Permit. The Suwannee County Commission has been overwhelmed by perceived economic benefits from this plant and has already given SAC approval to build their kiln next to the Ichetucknee State Park. Neither Alachua nor Suwannee counties has had the authority, expertise, nor resources required to adequately regulate emissions that will protect local health and welfare or establish appropriate emission standards for the entire cement industry.

We need help. Local citizens, companies, and counties need immediate regulatory and technical assistance to prevent our air quality from additional degradation. We need assistance to accurately identify, evaluate, and quantify environmental threats so that cement plant emissions can be reduced to acceptable levels.

We need federal support -- including the use of the NEPA Process -- to assure the public that the plant sites and manufacturing processes do not interfere with the health, welfare, and happiness of the existing residential, agricultural, and eco-tourist based community.

Florida Rock Industries, Alachua County, Suwannee American Cement Company, and Suwannee County must have access to the resources of the USEPA to resolve this impending crisis.

In Alachua County help is needed to identify, design, evaluate, test, demonstrate, and use innovative technologies that will reduce emissions from the FRI plant to the original estimated levels. This effort should include targeted research and development to identify and deploy innovative technologies that will reduce emissions to acceptable levels.

In Suwannee County help is needed to protect the Ichetucknee Springs, the Santa Fe River, and the Suwannee River. Throughout North Florida, help is needed to adequately measure and evaluate the cumulative impacts of emissions from three new cement plants and other sources on the health, safety, welfare of humans and ecosystems.

We solicit your intervention in this permitting process and welcome your advice and expertise in planning for sane development of our sensitive North Florida counties.

Thank you.

Sincerely,


David E. Bruderly, PE

Burley
 BURLEY ENGINEERING ASSOCIATES
 1826 N.W. 57th Terrace
 Gainesville, Florida 32605

RA

Mr. John Hankinson, Regional Administrator
 US Environmental Protection Agency
 The Federal Center
 100 Alabama Street SW
 Atlanta GA 30303



90303X8700 34



INTEROFFICE MEMORANDUM

Date: 15-Jun-1999 01:47pm
From: Joseph Kahn TAL
KAHN_J
Dept: Air Resources Management
Tel No: 850/921-9519

To: Cindy Phillips TAL (PHILLIPS_C)

Subject: Re: 40 CFR 63 Subpart LLL - Portland Cement Manufacturing Industry

Thanks. I'll revise the permitting note to reference the expected effective date of October 1st for adoption by reference.

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 15-Jun-1999 01:32pm
From: Cindy Phillips TAL
PHILLIPS_C
Dept: Air Resources Management
Tel No: 850/921-9534

To: Larry George TAL (GEORGE_L)
CC: Joseph Kahn TAL (KAHN_J)

Subject: Re: 40 CFR 63 Subpart LLL - Portland Cement Manufacturing Industry

Thanks Larry. Joe has already included the subpart conditions in the permit. We just want to make sure we tie-up the loose ends by following through with the rule adoption.

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 15-Jun-1999 01:29pm
From: Cindy Phillips TAL
PHILLIPS_C
Dept: Air Resources Management
Tel No: 850/921-9534

To: Joseph Kahn TAL (KAHN_J)

Subject: FWD: Re: 40 CFR 63 Subpart LLL - Portland Cement Manufacturing Industry

FYI Joe. Is there anything else you need Larry to do?

INTEROFFICE MEMORANDUM

Date: 15-Jun-1999 10:26am
From: Larry George TAL
GEORGE_L
Dept: Air Resources Management
Tel No: 850/921-9555

Subject: Re: 40 CFR 63 Subpart LLL - Portland Cement Manufacturing Industry

>Subpart LLL was promulgated in the federal register yesterday, June 14, 1999.
>Could you please adopt this subpart by reference as soon as possible? This is
>the subpart that Joe Kahn is including in the permit for the Suwannee plant.

Cindy, The schedule we are on is to publish a fast-track notice of adoption for all second quarter (April-June) NSPS/NESHAP in late July, to be adopted in early September with an effective date of October 1. Since the company has to comply with the subpart whether we adopt it or not, I assume the permit can go forward in the meantime. Let me know if we need to do something different in this case. (Note, it takes a minimum of 9-10 weeks to adopt anything by reference.) Larry

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 14-Jun-1999 04:05pm
From: Cindy Phillips TAL
PHILLIPS_C
Dept: Air Resources Management
Tel No: 850/921-9534

To: Joseph Kahn TAL (KAHN_J)
CC: Alvaro Linero TAL (LINERO_A)
CC: Clair Fancy TAL (FANCY_C)
CC: Howard Rhodes TAL (RHODES_H)

Subject: 40 CFR 63 Subpart LLL - Portland Cement Manufacturing Industry

FYI - Subpart LLL was promulgated today, June 14, in the Federal Register.
Here is the completed compliance date section:

Sec. 63.1351 Compliance dates.

(a) The compliance date for an owner or operator of an existing affected source subject to the provisions of this subpart is June 10, 2002.

(b) The compliance date for an owner or operator of an affected source subject to the provisions of this subpart that commences new construction or reconstruction after March 24, 1998 is June 9, 1999 or immediately upon startup of operations, whichever is later.

JOE
 - FY1
 I edited this part
 of subpart LLL
 some more.
 - Cindy 6/11

EMISSION STANDARDS AND OPERATING LIMITS

§63.1342 Standards: General.

(a) [See attached 40 CFR part 63, subpart A, general provisions, indicating the applicability of the general provisions requirements to subpart LLL.]

(b) Table 1 of this section provides a summary of emission limits and operating limits of this subpart.

Table 1 to §63.1342. Emission Limits and Operating Limits.

Affected Source	Pollutant or Opacity	Emission and Operating Limit
All kilns and in-line kiln/raw mills at major sources (including alkali bypass)	PM	0.15 kg/Mg of feed (dry basis)
	Opacity	20 percent
All kilns and in-line kiln/raw mills at major and area sources (including alkali bypass)	D/F	0.20 ng TEQ/dscm or 0.40 ng TEQ/dscm when the average of the performance test run average particulate matter control device (PMCD) inlet temperatures is 204° C or less. [Corrected to 7 percent oxygen] Operate such that the three-hour rolling average PMCD inlet temperature is no greater than the temperature established at performance test. If activated carbon injection is used:

LAW OFFICES

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

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*xc: Joe K
from: HUR
6/14*

TIMOTHY P. ATKINSON
M. CHRISTOPHER BRYANT
C. ANTHONY CLEVELAND
TERRY COLE
SEGUNDO J. FERNANDEZ
DANIEL W. HARTMAN
KENNETH F. HOFFMAN
KENNETH G. OERTEL
PATRICIA A. RENOVITCH

June 14, 1999

RECEIVED

JUN 14 1999

DIVISION OF AIR
RESOURCES MANAGEMENT

The Honorable Jeb Bush
PL 05 The Capitol
Tallahassee, FL 32399-0001

Dear Governor Bush:

I represent Suwannee American Cement Co., Inc., which has applied for permits to construct and operate a cement manufacturing plant in Branford, Florida. Among the permits which are required for such a facility is an air quality permit from the Florida Department of Environmental Protection.

That permit application is presently being reviewed by the Department of Environmental Protection. Suwannee American has put a great deal of effort into the design of this proposed plant and has engaged leading consultants to assist it in demonstrating to DEP that the facility will be operated in strict compliance with all state and federal requirements.

DEP is expected to act on this application in the very near future. Suwannee American has responded to all DEP's questions in a complete and thorough manner. It is our understanding that DEP is satisfied the proposed plant will operate in conformity with all standards. The entire Suwannee County Commission, and the great majority of Suwannee County strongly support this project. It will bring industry and jobs to the area, and greatly enhance the tax base.

We have learned that members of the public, who are seeking to have the permit application denied, have contacted your office. The opposition contend the plant will violate environmental regulations and that Suwannee American will be a "bad actor" because some of its principals are also owners of Anderson Columbia Co., Inc., a road building contractor. Suwannee American is a totally separate and independent company from Anderson Columbia.

Anderson Columbia, it is contended, is a violator of state environmental statutes. There have been numerous articles written about Anderson Columbia, most by the Pensacola News Journal, which have portrayed the company and its owners in a most unfavorable light.

The Honorable Jeb Bush
June 14, 1999
Page 2

Anyone, whether a natural person or a corporation, is in a difficult position to defend themselves when they become a popular target. I cannot list all the distortions and false statements written about Anderson Columbia, but I must mention a few. As recently as June 11, 1999, the Tallahassee Democrat, in an article about the proposed plant stated:

The Lake City company announced this week that it was selling an asphalt plant in Santa Rosa County that has fouled the Blackwater River. A company plant also is blamed for polluting groundwater in Dixie County.

I am very familiar with the Santa Rosa County facility. Prior to Anderson Columbia purchasing it, the site was an abandoned pre-stressed concrete plant. It was a mess, with uncontrolled runoff going directly into the Blackwater River. Anderson Columbia made it a cleaner place. The Blackwater River has not been "fouled" at all.

Anderson Columbia has never operated any facility in Dixie County. The published report which states that it did so is false. I also enclose a letter I received from the DEP General Counsel which describes where the Pensacola News Journal "misquoted" a Marine Patrol Officer regarding Anderson Columbia.

These articles are typical of the charges the media has published concerning Anderson Columbia. It has been difficult for the company to tell its side of these stories. In fact, Anderson Columbia attempted to respond to the numerous articles about it in the Pensacola News Journal. At its own expense, it sought to have the Pensacola News Journal print its response to these stories. The News Journal refused to sell Anderson Columbia space in its paper for that purpose.

Thus, the newspaper which has published a series of critical articles about my client would not even sell it space to tell its side of the story. Anderson Columbia has been in business for approximately 40 years. It operates over 10 asphalt plants in the state. As far as we can determine, none of these plants has ever been cited for an air quality violation.

Despite the chagrin Anderson Columbia feels regarding its public image, it is not the applicant for this permit. However its association with Suwannee American has resulted in this application receiving heightened scrutiny from DEP. Suwannee American has already agreed to a level of compliance for this plant which is above any existing plant in the state. The Company does not wish to put any public official in the position of having to defend its application unless it completely demonstrates entitlement to the permit.

In that context, in addition to providing assurances of compliance to DEP required of all applicants, Suwannee American will offer to post a bond as a surety that it will operate the plant in full conformity with all applicable rules. Suwannee American has previously agreed it will

The Honorable Jeb Bush

June 14, 1999

Page 3

install monitoring equipment at this plant which will be directly connected to DEP's office. Thus, if an air quality violation were to occur at the plant, DEP would know of it immediately.

Suwannee American stands ready to fulfill its obligations to the state for this permit to be issued. Its application and commitment to protecting the state is a promise that can be depended upon. We hope you will direct the Department to make its decision based on the criteria applicable to this type of project, and ensure that the standards used are those that have been applied to other similar facilities.

Yours truly,

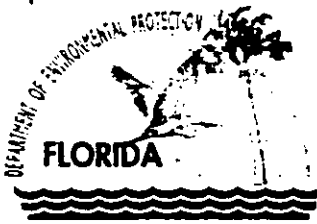
A handwritten signature in black ink, appearing to read "Kenneth G. Oertel". The signature is fluid and cursive, with the first name "Kenneth" and last name "Oertel" being the most prominent parts.

Kenneth G. Oertel

cc: David Struhs, Secretary DEP
Perry Odom, General Counsel DEP
Howard Rhodes

KGO/l dm

F:\document\KGO\LTR\Bush6-14.ltr.wpd



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

February 26²⁶ 12, 1999

Ken Oertel, Esquire
Oertel, Hoffman, Fernandez & Cole, P.A.
P.O. Box 1110
Tallahassee, Florida 32302-1110

RECEIVED

MAR 04 1999

OERTEL, HOFFMAN,
FERNANDEZ & COLE P.A.

RE: Anderson Columbia Co. and Panhandle Land & Timber Co. v. DEP and BTITF

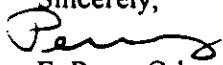
Dear Mr. ^{Ken}Oertel:

This letter is written in response to your letter dated December 18, 1998, regarding statements allegedly made by a Florida Marine Patrol Officer, as reported in the Pensacola News Journal of December 15, 1998. At my request, my staff investigated the allegations in your letter. Lieutenant Williams admitted that he made a statement similar to that reported; however, the statement was taken out of context by the newspaper.

Lieutenant Williams spoke with the reporter for approximately 15 minutes about general environmental issues in the area. In the course of that conversation, Lieutenant Williams commented that in the public's opinion, major companies like Monsanto, Cyanamid, Champion or Anderson Columbia have the resources to hire lobbyists and other specialists to "get their way." Lieutenant Williams advised that he did not mean to be derogatory in any way. In fact, he said many things in Anderson Columbia's benefit. However, none of these statements were included in the news article.

Lieutenant Williams admits that he has no first-hand knowledge about Anderson Columbia's road building activities in Florida. Indeed, he made no comments regarding that issue, and the article in no way infers that he had any particular knowledge on that issue.

I'm afraid the situation you complain of was created by the reporter who appears to have paraphrased Lieutenant Williams' statement to "make a better story." If you have any questions regarding this matter, please contact me or David Thulman at (850) 488-9314.

Sincerely,

F. Perry Odom
General Counsel

cc: Bobby Cooley, NWD, DEP
Cliff Rohlke, NWD, DEP
David Thulman, OGC, DEP

"Protect, Conserve and Manage Florida's Environment and Natural Resources"



Suwannee American Cement Co. Inc.

P.O. Box 38
Old Town, FL 32680

Phone: 352 542-7942 FAX: 352 542-3417

To: Joe K
From: Howard
6/14

June 10, 1999

State of Florida
Department of Environmental Protection
Mail Station 5500
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JUN 14 1999

DIVISION OF AIR
RESOURCES MANAGEMENT

Attention: Mr. Howard L. Rhodes

Dear Mr. Rhodes:

In response to your recent request, I am enclosing the following information regarding the proposed Suwannee American Cement Plant at Branford, Florida:

1. Resumes of Chuck Yagel and me.
2. Draft Organizational Chart for the plant.
3. Key position job descriptions.
4. Listing of Plant Consultants.

Thank you again for meeting with us on Wednesday. If further information is required, please do not hesitate to contact us.

Sincerely,

Fred W. Koester
Project Director

Enclosures

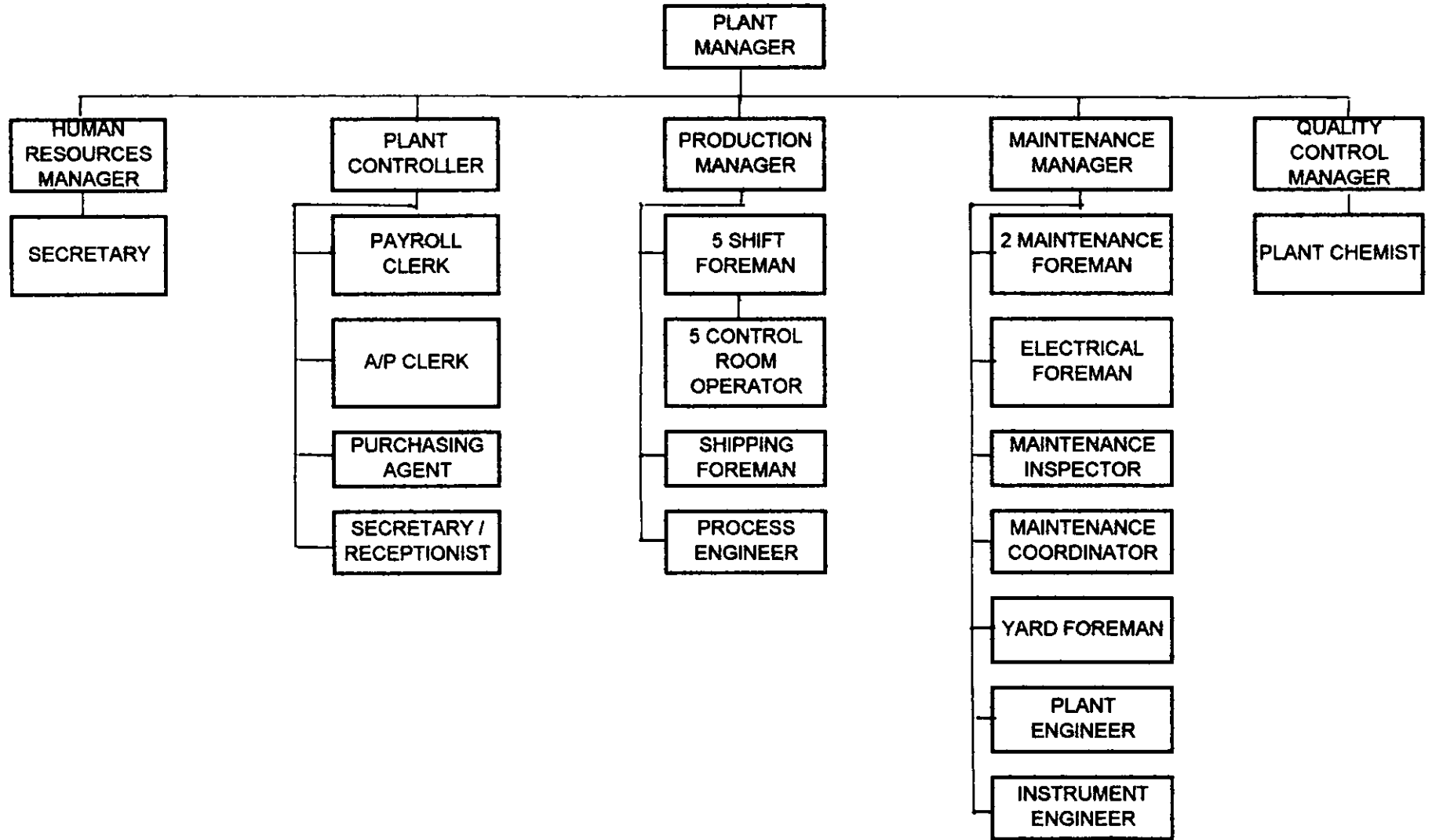
FRED W. KOESTER**PROJECT DIRECTOR**

- After 11 years in various cement industry operations positions, joined General Portland as Maintenance Manager, Paulding Plant, in 1970
- Assistant Plant Manager, Houston, 1972
- Plant Manager, Fort Worth, 1973
- Operations Manager, Trinity Division, 1975
- Director-Maintenance Planning, January 1977
- Director-Preheater Plants Projects, June 1977
- Vice President and General Manager, Trinity North Division, May 1981
- Senior Vice President-Operations, April 1982
- Senior Vice President, August 1984
- Executive Vice President of General Portland Inc., April 1985
- President of Lafarge Corporation, Southern Region, and Senior Vice President, Lafarge Corporation, February 1987
- President of Lafarge Corporation, Great Lakes Region, and Senior Vice President, Lafarge Corporation, May 1992
- Retired and Consultant to Lafarge Corporation, Great Lakes Region, July 1994
- Retired January 1996

BSME, Marquette University

Suwannee American Cement

DRAFT ORGANIZATIONAL CHART



Charles W. Yagel

Vice President of Operations

During twenty-six years in the Cement Industry, Mr. Yagel has managed cement plant maintenance and operations in two plants of differing technology. He has also coordinated the design, supply, construction, and start-up of numerous complete plants throughout the world.

Prior Experience

Roberts & Schaefer Company: Director of Cement Operations

Responsible for all cement industry related company activities. This included provision of technical, marketing, and industry specific guidance and liaison between customers and the Engineering office.

Humboldt Wedag Inc.: Contract Manager

Duties included Project Management of all phases of Cement Plant supply, including direct liaison with customers world wide.

Polysius Corporation: Contract Manager

Duties included Project Management of all phases of Cement Plant supply, including direct liaison with customers world wide.

National Cement Copany: Plant Engineer

Santee Portland Cement Co. Plant Engineer

PLANT CONSULTANTS

ENVIRONMENTAL

DARABI AND ASSOCIATES, INC.
Suite A
730 North Waldo Road
Gainesville, FL 32601

KOOGLER AND ASSOCIATES
4014 NW 13th Street
Gainesville, FL 32609

LABORATORY

CONSTRUCTION TECHNOLOGY LABORATORIES, INC.
5420 Old Orchard Road
Skokie, IL 60077-1030

PROCESS

KRUPP POLYSIUS CORP.
180 Interstate North
Atlanta, GA 30339-2194

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 09-Jun-1999 01:40pm

From: Mark Latch TAL
LATCH_M@a1.epic6.dep.state.fl.us

Dept:

Tel No:

To: Joseph Kahn TAL

(KAHN_J@A1)

CC: Thomas Workman GNSV

(WORKMAN_T@a1.epic6.dep.state.fl.us)

Subject: FWD: Re: FWD: Letter to Suwannee American Cement

Can we do anything about adding this? they look like pretty good suggestions.

ml

06/09

INTEROFFICE MEMORANDUM

Date: 21-May-1999 09:23am
From: Thomas Workman GNSV
WORKMAN_T@a1.epic6.dep.state.fl.us
Dept:
Tel No:

Subject: Re: FWD: Letter to Suwannee American Cement

At the minimum we should request an air monitoring station at the park. This should comply with EPA standards and be compatible with the new air quality monitoring stations that the Alachua County Environmental Protection Department recently brought into operation. We should request that this monitoring station be brought online immediately following the issuing of any air permit by DEP. This way we may collect some pre-cement plant data, as it will likely take a year to build the plant.

It would also be to our benefit to request that a monitoring program be established to test the quality of rainfall deposition. This is different than air monitoring and is more of a water quality issue. I suggest that several times per year, perhaps quarterly, that rainfall samples be analyzed for chemical components.

It would be beneficial if a comprehensive water quality analysis be performed on the river every 2 to 3 years. By comprehensive I mean a sample from every spring and from points throughout the Ichetucknee Trace.

Thank you for the chance to respond.

TW



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

MEMORANDUM

RECEIVED
JUN 08 1999
BUREAU OF
AIR REGULATION

TO: Cleve Holladay
FROM: Steve Cullen
DATE: June 8, 1999
SUBJECT: Suwannee American Cement

Per your request, enclosed are three disks containing the ISC output files for the subject facility.

If you have any questions, please do not hesitate to contact me.

INTEROFFICE MEMORANDUM

Date: 07-Jun-1999 09:56am
From: John Peterson TAL
PETERSON_J@a1.epic6.dep.state.fl.us
Dept:
Tel No:

To: Joseph Kahn TAL (KAHN_J@A1)

Subject: - no subject (01JC45H673TC9ANFYC) -

FYI- The Governor's Office forwarded a card/letter form Arlene and James Walsh to Governor Jebb Bush regarding the construction of the cement plant near the Ichetucknee. The directions are handle appropriately. I am putting it in the mail to you today. Thanks.

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 04-Jun-1999 08:48am
From: Dennis Tober TAL
TOBER_D
Dept: Air Resources Management
Tel No: 850/488-6140

To: Joseph Kahn TAL (KAHN_J)
CC: Howard Rhodes TAL (RHODES_H)
CC: Clair Fancy TAL (FANCY_C)
CC: Jim Pennington TAL (PENNINGTON_J)

Subject: AC Compliance History

Attached is what I found regarding AC's record at DOT

**Case File: Anderson Columbia Co.
Compliance History Interview
of
Fla. Dept. of Transportation**

Date: 5/26/99

Contact: Roger Wood, Environmental Attorney, DOT

Phone #: 414 5384

Conducted telephone interview to discuss compliance history of AC. Mr. Wood stated that DOT's relationship with AC involved contracts for road paving related projects. Mr. Wood referred me to Andy Moore, DOT Tampa office, to discuss the only environmental related involvement of AC he was aware of i.e., Asphalt Pavers in Hernando County.

Date: 5/26/99

Contact: Andy Moore, DOT Tampa office

Phone: 813- 7446100 ext 381

Conducted telephone interview with Mr. Moore. Mr. Moore stated that AC presently served as a payed consultant to Asphalt Pavers located in Hernando County which was an asphalt and soil treatment company. They quit treating soil in the late 1980's (land leased from Florida Rock) and left contaminated soil and is thereby being sued by Florida Rock. Mr. Moore's involvement is to assess the amount of soil in question and any associated damage. Mr. Moore stated that AC's role is that of a hired consultant only and referred me to Greg Zanders of DOT for road contract information regarding AC.

Date: 5/26/99

Contact: Greg Zanders, DOT

Phone: 414 5203

Conducted telephone interview with Mr. Zanders. Mr. Zanders stated that the relationship between DOT and AC was contractual involving road paving projects around the state. Mr. Zanders stated that this relationship sometimes involved contract disputes between the two parties for the work being done. I asked what was known regarding any other types of problems, especially those involving matters of an environmental nature. Mr. Zanders stated that he did not know of any specifics but he would check with his two district offices for specifics. Mr. Zanders scheduled a return call to me the week of June 1.

Date: 6/1/99

Contact: Greg Zanders, DOT

Left phone message for Mr. Zanders requesting that I would like more information regarding the specific type of contract problems DOT normally experienced with AC. I informed him that I was interested in the relationship of the party's record on work contracts as related to the potential to meet our permitting conditions.

Date: 6/3/99

Contact: Greg Zanders, DOT

Mr. Zanders contacted me by phone and stated that the responses he received from his district personnel indicated that AC's record reflected no particular past pattern and nothing on a recent basis regarding negative environmental compliance. He stated that the primary area of DOT overview involved NPDES, the National Pollution Discharge Elimination System. This involves those items typical of silting pens, hay bailing and other controls for controlling runoff and was normal for the industry.

Regarding the matter of contract compliance, he stated that general problems involving contract disputes are standard within the industry for the type of work contracted i.e., if a particular company contracts significant amounts of work, then one could expect to see significant amounts of contract problems and disputes. AC's record in this matter is what one would expect from the amount of work that they contract with DOT.

INTEROFFICE MEMORANDUM

Date: 02-Jun-1999 01:07pm
From: Sardina, Melanie
sardina_m@srwmd.state.fl.us
Dept:
Tel No:

To: 'joseph.kahn@dep.state.fl.us' (KAHN_J@A1)

Subject: Anderson Columbia

Hi Mr. Kahn -- The attached is a general list of some the dealings SRWMD has had with Anderson Columbia. Feel free to contact me if you have any questions.

Thanks,
Melanie Sardina

Suwannee River Water Management District		
Data for		
Anderson Columbia Company		
Permit Information		
PERMIT #	PROJECT NAME	COUNTY
4-93-00103	ANDERSON COLUMBIA CO., INC.	COLUMBIA
4-93-00153	HILL BORROW PIT	HAMILTON
ERP96-0350	ANDERSON/COLUMBIA ROAD IMPROVEMENTS	DIXIE
ERP97-0107	NEW HOPE ASPHALT PLANT	HAMILTON
ERP97-0115	UPLAND BORROW PIT - 0312220 5/27/97	HAMILTON
ERP97-0147	I-75 BORROW PIT	SUWANNEE
ERP97-0159	CONNELL ROAD PLANT	TAYLOR
ERP97-0230	ANDERSON COLUMBIA/JACKSON ASPHALT PLANT	LAFAYETTE
ERP97-0240	ANDERSON COLUMBIA CONCRETE PLANT	MADISON
ERP97-0250	MARCANO BORROW PIT	MADISON
ERP97-0322	ANDERSON ASPHALT PLANT STORAGE AREA	COLUMBIA
ERP98-0056	ANDERSON COLUMBIA RADIO TOWER	COLUMBIA
ERP98-0066	OLD TOWN COMMUNICATIONS TOWER--101313	DIXIE
ERP98-0155	HUDSON BORROW PIT	COLUMBIA
ERP98-0243	DIXIE COUNTY ASPHALT PLANT	DIXIE
ERP98-0258	THOMAS BORROW PIT	COLUMBIA
ERP98-0330	HARRISON BORROW PIT	COLUMBIA
ERP99-0043	MAHONY BORROW PIT	COLUMBIA
ERP99-0194	SEAGO BORROW PIT	MADISON
ERP99-0208	CASON BORROW PIT	MADISON
ERP99-0214	BOOTS BORROW PIT	MADISON
ERP99-0237	DEES BORROW PIT	LAFAYETTE
ERP99-0245	FRANKLIN BORROW PITS	MADISON
ERP99-0246	SMOAK BORROW PIT	MADISON
ERP99-0247	DRIGGERS BORROW PIT	MADISON
ERP99-0248	THOMPSON BORROW PIT	MADISON
Complaint Information		
Complaint #	CMP98-0175	
Date Recv'd	4/7/98	
Complaint	Possible dumping of industrial waste in mining pit	
Action	This was actually referred to us by DEP. DEP had already been out on site. Sally Heuer at DEP-Jax sent the following message via e-mail: the bag house waste was actually the dust from uncontaminated limestone aggregate which was being spread over clay to stabilize the roadway between 2 limestone pits. Neal Newton (air section) and Rob Lear (industrial waste) actually inspected the site and saw no violations.	
Complaint #	CMP99-0074	
Date Recv'd	4/30/99	
Complaint	Anderson Columbia filling pre-existing hole with construction waste	
Action	Forwarded to Don Jensen (SRWMD DEP rep.) who states that DEP will be taking this to enforcement	
Enforcement Information		
Enforcement #	CE97-0036	
Date Enforced	11/7/97	
Violation	2.10 acres of wetlands disturbed with fill in an isolated wetland. This is in conjunction with ERP permit # ERP97-0322, Anderson Asphalt Plant Storage Area in Columbia County	
Action	This is being handled in-house. Mitigation is required. We are presently waiting on a finalized plan.	
Note:	SRWMD possibly could have another enforcement action starting against a member of Anderson Columbia for some activity near I-75 in Columbia County.	



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

RECEIVED

JUN 04 1999

**BUREAU OF
AIR REGULATION**

June 3, 1999

Mr. Joseph Kahn, PE
New Source Review Section
Department of Environmental
Protection
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

Subject: Suwannee American Cement Company
DEP File No. 1210465-001-AC (PSD-FL-259)
Regional Haze Analyses Utilizing MESOPUFF for Class I Areas

Dear Mr. Kahn:

This letter shall transmit 2 copies of the regional haze analyses for the 3 Class I areas, and 2 copies of a disk containing the MESOPUFF dispersion modeling that was used to predict concentrations at the Class I areas.

The refined modeling and analyses clearly show that the proposed plant's contribution to regional haze is minimal at the Class I areas.

This information is being provided to you for transmittal to the National Park Service.

If you require any further information, please do not hesitate to contact me.

Sincerely,

Steven C. Cullen, PE
Koogler & Associates

copy (w/o disk) to: Frank Darabi, PE

Discussion of Input Parameters

Pollutant Concentrations ($\mu\text{g}/\text{m}^3$)

Pollutant concentrations were modeled for this response using the MESOPUFF long-range transport dispersion model. 24-hour average concentrations were used.¹

The generally observed sulfate compound is ammonium sulfate $\{(\text{NH}_4)_2\text{SO}_4\}$, although ammonium bisulfate and un-neutralized sulfuric acid particles have also been measured. Particles composed of nitrate compounds usually take the form of ammonium nitrate $\{\text{NH}_4\text{NO}_3\}$. These compounds are generally not directly emitted from air pollutant sources, but are formed through a series of chemical reactions in the atmosphere. The air pollutants, which contribute to the formation of these particles, are gaseous emissions of oxides of sulfur and nitrogen (SO_x and NO_x), which eventually oxidize to form SO and nitric acid (HNO_3), as well as other compounds, and ultimately react with natural and anthropogenic emissions of ammonia. The formation of NH_4NO_3 is dependent on the concentrations of ammonia gas (NH_3) and nitric acid (HNO_3) as well as the concentration of SO . SO competes with HNO_3 for the available NH_3 . Thus, in the presence of both SO and HNO_3 , $(\text{NH}_4)_2\text{SO}_4$ will be formed preferentially to NH_4NO_3 . Essentially, NH_4NO_3 will only be formed when there is an excess of NH_3 available, relative to SO . The MESOPUFF-II modeling system accounts for the balance between SO , HNO_3 and NH_3 . Therefore, emissions of both SO_2 and NO_x were modeled in the same run to account for this balance.²

¹ Guidance from John Notar (NPS), March 1995.

² IWAQM

Data were reviewed from the Interagency Monitoring of Protected Visual Environments (IMPROVE) program and from the Florida DEP ALLSUM/AIRS information.. These data clearly confirmed that the atmosphere in the area of study is “ammonia-limited”, and the sulfate particles are formed to the exclusion of the nitrate particles. Ambient data show NO_x present at concentrations approximately 4 times greater than SO₂. However, IMPROVE aerosol samplers at Chassahowitzka NWA and Okefenokee NWA show sulfate particles at concentrations approximately 10 times greater than nitrate particles. The data also show that, while 40-85% of ambient SO₂ is neutralized to ammonium sulfate, only 1-2% of ambient NO_x is neutralized to ammonium nitrate.

Relative Humidity (%)

Hourly relative humidity values are available for each of the three Class I areas:

- St. Marks NWA: Tallahassee Airport
- Okefenokee NWA: Cecil Field Naval Air Station
- Chassahowitzka NWA: Tampa International Airport

As 24-hour average concentrations were used, it is consistent with the IWAQM method to use the 24-hour average relative humidity for each of the days with the highest concentrations. For this response, however, the highest recorded hourly relative humidity is used for the day with the highest concentrations.

The relative humidity values are used when calculating the extinction coefficients, as some particles accumulate water and become more efficient at scattering light.³ The relative humidity is used to determine the relative humidity factor. The sulfate and nitrate concentrations are multiplied by the relative humidity factor, the particulate concentrations are not.

³ Visibility Protection Brochure, IMPROVE program, August 1994.



Chassahowitzka NWA -- Regional Haze Analysis

The maximum 24-hour average SO₄ concentration was calculated to be 0.0015 µg/m³ November 4, 1986. Maximum hourly RH = 97%, f(RH) = 14.5

The PM₁₀ concentration at the same location and date was calculated to be 0.0061 µg/m³ and the NO₃ concentration was calculated to be 0.0 µg/m³.

Multiply the mass concentration of SO₄ by 1.375 to obtain (NH₄)₂SO₄

$$0.0015 \mu\text{g}/\text{m}^3 \times 1.375 = 0.0021 \mu\text{g}/\text{m}^3$$

Multiply the mass concentration of NO₃ by 1.29 to obtain NH₄NO₃
 $0.0 \mu\text{g}/\text{m}^3 \times 1.29 = 0.0000 \mu\text{g}/\text{m}^3$

Calculate the extinction by the following equation:

$$b_{ext} = 0.003 \times \text{concentration} \times f(RH)$$

$$\begin{aligned} & \text{(NH}_4\text{)}_2\text{SO}_4 \qquad \text{NH}_4\text{NO}_3 \qquad \text{PM}_{10} \\ = & [0.003 \times 0.0021 \times 14.5] + [0.003 \times 0 \times 14.5] + [0.003 \times 0.0061 \times 1.0] \\ = & 0.00009 + 0.00 + 0.00002 = 0.00011 \end{aligned}$$

Calculate change in deciviews (dv) by the following equation:

$$\Delta dv = \ln (1 + b_{ext}/b_{bgd}) \times 10 = \ln (1 + 0.00011/0.0602) \times 10 = \underline{0.02 \text{ dv Change}}$$

Okefenokee NWA -- Regional Haze Analysis

The maximum 24-hour average SO₄ concentration was calculated to be 0.0036 µg/m³ January 23, 1986. Maximum hourly RH = 90%, f(RH) = 6

The PM10 concentration at the same location and date was calculated to be 0.023 µg/m³ and the NO₃ concentration was calculated to be 0.0 µg/m³.

Multiply the mass concentration of SO₄ by 1.375 to obtain (NH₄)₂SO₄

$$0.0036 \mu\text{g}/\text{m}^3 \times 1.375 = 0.0050 \mu\text{g}/\text{m}^3$$

Multiply the mass concentration of NO₃ by 1.29 to obtain NH₄NO₃
 $0.0 \mu\text{g}/\text{m}^3 \times 1.29 = 0.0000 \mu\text{g}/\text{m}^3$

Calculate the extinction by the following equation:

$$b_{ext} = 0.003 \times \text{concentration} \times f(RH)$$

$$\begin{aligned} & \text{(NH}_4\text{)}_2\text{SO}_4 \qquad \text{NH}_4\text{NO}_3 \qquad \text{PM10} \\ = & [0.003 \times 0.0050 \times 6] + [0.003 \times 0 \times 6] + [0.003 \times 0.023 \times 1.0] \\ = & 0.00009 + 0.00 + 0.00007 = 0.00016 \end{aligned}$$

Calculate change in deciviews (dv) by the following equation:

$$\Delta dv = \ln (1 + b_{ext}/b_{bgd}) \times 10 = \ln (1 + 0.00016/0.0602) \times 10 = \underline{0.03 \text{ dv Change}}$$

St. Marks NWA -- Regional Haze Analysis

The maximum 24-hour average SO₄ concentration was calculated to be 0.0040 µg/m³ December 2, 1986. Maximum hourly RH = 100%, f(RH) = 19.2

The PM10 concentration at the same location and date was calculated to be 0.011 µg/m³ and the NO₃ concentration was calculated to be 0.0 µg/m³.

Multiply the mass concentration of SO₄ by 1.375 to obtain (NH₄)₂SO₄

$$0.0040 \mu\text{g}/\text{m}^3 \times 1.375 = 0.0055 \mu\text{g}/\text{m}^3$$

Multiply the mass concentration of NO₃ by 1.29 to obtain NH₄NO₃
 $0.0 \mu\text{g}/\text{m}^3 \times 1.29 = 0.0000 \mu\text{g}/\text{m}^3$

Calculate the extinction by the following equation:

$$b_{ext} = 0.003 \times \text{concentration} \times f(RH)$$

$$\begin{aligned} & \text{(NH}_4\text{)}_2\text{SO}_4 \qquad \text{NH}_4\text{NO}_3 \qquad \text{PM10} \\ = & [0.003 \times 0.0055 \times 19.2] + [0.003 \times 0 \times 19.2] + [0.003 \times 0.011 \times 1.0] \\ = & 0.00032 + 0.00 + 0.00003 = 0.00035 \end{aligned}$$

Calculate change in deciviews (dv) by the following equation:

$$\Delta dv = \ln (1 + b_{ext}/b_{bgd}) \times 10 = \ln (1 + 0.00035/0.0602) \times 10 = \underline{0.06 \text{ dv Change}}$$

THIS DISK CONTAINS MESOPUFF CLASS 1 VISUAL IMPACT ANALYSIS FILES FOR THE CHASSAHOWITZKA NWR, OKEFENOKEE NWR AND ST. MARKS NWR. THESE FILES ARE IN A SELF EXTRACTING ARCHIVE FORMAT. THE FOLLOWING ARE INPUT, OUTPUT AND METEOROLOGICAL FILES FOR THE PROPOSED SUWANNEE AMERICAN CEMENT PLANT IN BRANFORD, FLORIDA.

CHZ-PAC	EXE	311,060	06-02-99	CHASSAHOWITZKA MESOPAC
NRTH-PAC	EXE	308,806	06-02-99	OKEFENOKEE & ST. MARKS MESOPAC
PUF-INP	EXE	18,745	06-02-99	MESOPUFF INPUT FILES
CHZ-FIL	EXE	70,008	06-02-99	CHASSAHOWITZKA MESOFILE
OKY-FIL	EXE	111,920	06-02-99	OKEFENOKEE MESOFILE
STM-FIL	EXE	110,253	06-02-99	ST. MARKS MESOFILE
AND				
READ	ME	5,311	06-02-99	THIS FILE

TO UNARCHIVE THESE FILES COPY THEM TO A HARD DISK DRIVE AND TYPE THE FILE NAME. FOR EXAMPLE, TO UNARCHIVE THE MESOFILE METEOROLOGICAL AND RUN FILES FOR CHASSAHOWITZKA, TYPE "CHZ-PAC" AND PRESS ENTER. THE FILES WILL AUTOMATICALLY UNARCHIVE TO THE HARD DISK DRIVE. THESE ARCHIVED FILES CONTAIN THE MODELING FILES DESCRIBED AS FOLLOWS:

"CHZ-PAC" MESOPAC FILES FOR CHASSAHOWITZKA NWR:

CD1	DAT	713,448	05-12-95	TAMPA SURFACE DATA
CD2	DAT	713,448	05-11-95	GAINESVILLE SURFACE DATA
UP1	DAT	357,274	05-11-95	RUSKIN UPPER AIR DATA

PAC	INP	569	03-31-99	MESOPAC INPUT CARDS
PAC	LST	12,356	03-31-99	MESOPAC OUTPUT FILE (1)
PAC	BAT	102	05-10-95	MESOPAC BATCH FILE

"NRTH-PAC" MESOPAC FILES FOR OKEFENOKEE & ST. MARKS MESOPAC:

CD1	DAT	713,448	05-12-95	GAINESVILLE SURFACE DATA
CD2	DAT	713,448	03-26-99	TALLAHASSEE SURFACE DATA
UP1	DAT	345,843	05-11-95	WAYCROSS UPPER AIR DATA

PAC	BAT	102	05-10-95	MESOPAC INPUT CARDS
PAC	INP	621	03-26-99	MESOPAC BATCH FILE

(1) NOTE: THE PACOUT.DAT FILE IS OMITTED DUE TO SIZE. THE PACOUT.DAT FILE IS THE BINARY METEOROLOGICAL INPUT TO MESOPUFF AND REQUIRES ABOUT 30 MEGABYTES OF DISK STORAGE SPACE.

"PUF-INP" MESOPUFF INPUT FILES:

CHZ-PUF	INP	1,151	03-31-99	CHASSAHOWITZKA MESOPUFF FOR NO3 & SO4
CHZPF-PM	INP	1,151	03-31-99	CHASSAHOWITZKA MESOPUFF FOR PM

OKY-PUF	INP	1,761	04-01-99	OKEFENOKEE MESOPUFF FOR NO3 & SO4
OKYPFPM	INP	1,764	04-01-99	OKEFENOKEE MESOPUFF FOR PM

STM-PUF	INP	2,229	03-31-99	ST. MARKS MESOPUFF FOR NO3 & SO4
STMPF-PM	INP	2,232	03-31-99	ST. MARKS MESOPUFF FOR PM

(2) NOTE: THE INFILE1.DAT AND PUFF.LST FILES ARE OMITTED DUE TO SIZE. INFILE1.DAT IS NAMED "PUFFOUT.DAT" BY THE MESOPUFF MODEL. IT MUST BE MANUALLY RENAMED "INFILE1.DAT" FOR INPUT TO MESOFILE.

"CHZ-FIL" MESOFILE FILES FOR CHASSAHOWITZKA:

FIL24N03	CHZ	344	03-31-99	INPUT FOR N03 (3)
FIL24PM	CHZ	343	03-31-99	INPUT FOR PM
FIL24S04	CHZ	344	03-31-99	INPUT FOR S04

CHZ24N03	LST	284,187	03-31-99	OUTPUT FOR N03 (4)
CHZ24PM	LST	284,187	03-31-99	OUTPUT FOR PM
CHZ24S04	LST	284,187	03-31-99	OUTPUT FOR S04

CHZ24N03	PRN	13,470	04-01-99	SPREADSHEET INPUT FOR N03
CHZ24PM	PRN	13,900	04-01-99	SPREADSHEET INPUT FOR PM
CHZ24S04	PRN	14,198	04-01-99	SPREADSHEET INPUT FOR S04

CHZ-MAX	WQ1	52,518	04-01-99	MAXIMUM 24-HOUR AVERAGE SPREADSHEET IN QUATTRO FORMAT
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(3) NOTE: THESE INPUT FILES MUST BE MANUALLY RENAMED "FILE.INP" BEFORE RUNNING THE MESOFILE POST PROCESSOR.

(4) NOTE: THE MESOFILE OUTPUT FILES ARE NAMED "FILE.LST" BY THE MESOFILE POST PROCESSOR. THEY WERE MANUALLY RENAMED.

"OKY-FIL" MESOFILE FILES FOR OKEFENOCKEE:

FIL24-PM	OKY	339	03-31-99	INPUT FOR N03
FIL24N03	OKY	340	03-31-99	INPUT FOR PM
FIL24S04	OKY	340	03-31-99	INPUT FOR S04

OKY24N03	LST	403,721	04-01-99	OUTPUT FOR N03
OKY24PM	LST	403,721	04-01-99	OUTPUT FOR PM
OKY24S04	LST	403,721	03-31-99	OUTPUT FOR S04

OKY24N03	PRN	14,196	04-01-99	SPREADSHEET INPUT FOR N03
OKY24PM	PRN	14,198	04-01-99	SPREADSHEET INPUT FOR PM
OKY24S04	PRN	14,269	04-01-99	SPREADSHEET INPUT FOR S04

OKY-MX	WQ1	53,693	04-01-99	MAXIMUM 24-HOUR AVERAGE SPREADSHEET IN QUATTRO FORMAT
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"STM-FIL" MESOFILE FILES FOR ST. MARKS:

FIL24-PM	STM	338	03-31-99	INPUT FOR N03
FIL24N03	STM	339	03-31-99	INPUT FOR PM
FIL24S04	STM	339	03-31-99	INPUT FOR S04

STM24N03	LST	534,165	03-31-99	OUTPUT FOR N03
STM24PM	LST	534,165	04-01-99	OUTPUT FOR PM
STM24S04	LST	534,165	03-31-99	OUTPUT FOR S04

STM24N03	PRN	14,234	04-01-99	SPREADSHEET INPUT FOR N03
STM24PM	PRN	14,254	04-01-99	SPREADSHEET INPUT FOR PM
STM24S04	PRN	14,196	04-01-99	SPREADSHEET INPUT FOR S04

STM-MAX	WQ1	52,774	04-01-99	MAXIMUM 24-HOUR AVERAGE SPREADSHEET IN QUATTRO FORMAT
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IF FURTHER CLARIFICATION CAN BE PROVIDED OR IF ADDITIONAL FILES ARE REQUIRED PLEASE CONTACT ME.

MARK KOLETZKE
KOOGLER AND ASSOCIATES
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KOOGLER@WORLDNET.ATT.NET

INTEROFFICE MEMORANDUM

Date: 01-Jun-1999 01:03pm
From: Joseph Kahn TAL
KAHN_J
Dept: Air Resources Management
Tel No: 850/921-9519

To: Cleve Holladay TAL (HOLLADAY_C)

Subject: Modeling for Suwannee American Cement

Per our conversation with Ellen Porter today, it appears that Mesopuff modeling is sufficient to evaluate regional haze impacts on the three Class I areas closest to the proposed cement plant because it was an allowable procedure under phase I of IWAQM. Phase I was the procedure in place at the time the application was submitted. I'll call Steve Cullen and ask him to express mail the diskettes to us and FWS.