



**KOOGLER & ASSOCIATES**  
**ENVIRONMENTAL SERVICES**  
4014 NW THIRTEENTH STREET  
GAINESVILLE, FLORIDA 32609  
352/377-5822 • FAX/377-7158

KA 624-98-01

April 28, 1999

**RECEIVED**

MAY 04 1999

BUREAU OF  
AIR REGULATION

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

Subject: Suwannee American Cement Company, Inc.  
FDEP File No. 1210465-001-AC (PSD-FL-259)  
Response to FDEP Correspondence Dated  
April 19 and 22, 1999

Dear Mr. Kahn:

The applicant notes that the matters inquired of in the referenced requests are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department continue processing the permit application under Section 403.0876(2)(a), F.S. as stated would be the case in your letter to Suwannee American Cement Company, Inc. (Suwannee American) dated April 22, 1999.

We further note that this request was conveyed separately from and beyond the 30-day completeness review deadline that resulted in the last RAI dated March 26, 1999. However, in a continuing effort to be responsive to the concerns behind the questions asked, the applicant submits the following information, provided the submittal does not affect the permit processing time clock.

The sulfur dioxide emission limit of 0.28 pounds of SO<sub>2</sub> per short ton of clinker proposed by Suwannee American as Best Available Control Technology (BACT) was discussed in detail in Response No. 5 of the additional information we provided the Department on February 25, 1999. In this response, it was pointed out that the BACT SO<sub>2</sub> limits for Florida Portland cement plants are 2-30 times lower than limits for other plants around the country. This is due to the fact that there is very little sulfur in the feed materials to the plants which can be released as SO<sub>2</sub> in the preheater and/or precalciner.

The fact that there are other cement plants in the U.S. with scrubbers was also discussed. It was pointed out that there are several reasons for scrubbers and when there is a valid reason, scrubbers are justified. This is not the case with Suwannee American. For example, the TXI plant in Midlothian, Texas, reportedly has a sulfur dioxide emission rate of approximately 800 pounds per hour following a scrubber. This would relate to an uncontrolled SO<sub>2</sub> emission limit in the range of 4,000 pounds per hour (assuming 80 percent scrubbing efficiency). The Suwannee American plant, in contrast, has an uncontrolled SO<sub>2</sub> emission rate of 26.8 pounds per hour. It was also pointed out that the Holnam plant in Dundee, Michigan, is a wet-process plant and that scrubbers and an oxidizer were installed on the 40-year old plant to reduce SO<sub>2</sub>, odors and a visible non-steam plume.

Based on the request of the National Park Service (NPS), the use of a scrubber to control SO<sub>2</sub> at the Holnam cement plant in Florence, Colorado, has also been investigated. The plant and the permitting process were discussed with personnel from the Colorado Department of Health, Air Pollution Control Division and Holnam Cement. The Holnam permit application is still in the review process.

The Holnam, Florence, Colorado, plant will be a dry process precalciner plant replacing three existing wet-process kilns. The production capacity of the plant will be 5400 metric tons (5940 short tons) of clinker per day. In contrast, the Suwannee American plant has a clinker production capacity of 2300 short tons per day. The limestone utilized at the Holnam plant is high in pyritic sulfur and kerogens. This results in a potential uncontrolled SO<sub>2</sub> emission rate of approximately 5.8 pounds per short ton of clinker (approximately 1435 pounds per hour or 5600 tons per year of SO<sub>2</sub>) from the proposed plant. The kerogens are suspected of contributing ammonia to the stack gas which reacts with the SO<sub>2</sub> to form a visible, but detached ammonium sulfate plume from the existing Holnam plant. This same problem is anticipated with the proposed Holnam plant. Holnam elected to install a scrubber on the proposed plant, not as BACT, but to avoid the PSD permitting process and to reduce the ammonia which contributes to the visible plume.

At the Holnam plant, approximately 92 percent of the gas stream from the kiln and the kiln bypass will be routed through a SO<sub>2</sub> scrubber with a design efficiency of 87.5 percent. The resulting SO<sub>2</sub> emission rate from the scrubber system will be approximately 650 tons per year. The remaining eight percent of the kiln gases will pass through the coal mill and will be discharged to the atmosphere with no SO<sub>2</sub> control. The SO<sub>2</sub> emission rate from the coal mill will be approximately 450 tons per year. The combined controlled SO<sub>2</sub> emission rate from the coal mill, the kiln and the kiln bypass will be approximately 1100 tons per year; or approximately 1.14 pounds per short ton of clinker.

Thus, even with control, the SO<sub>2</sub> emissions from the Holnam plant are over four times greater than the projected emissions from the Suwannee American plant (per ton of clinker) and approximately 10 times greater on a mass (tons per year) basis. Even though the proposed BACT limit for SO<sub>2</sub> for the Suwannee American plant is among the lowest in the country, and much lower than the non-BACT limit for SO<sub>2</sub> for the Holnam Colorado plant, a cost analysis of a scrubber system for the Suwannee American plant will be provided to be responsive to the NPS.

Based on Holnam costs for scrubbers at their Colorado and Texas plants, an installed scrubber cost of \$6.6 million was estimated for Suwannee American. Scrubber water disposal off-site was estimated at \$0.15 per gallon or \$1.6 million per year as there is no place in plant processes to dispose of the blow-down (per Polysius) and a surface water discharge is out of the question. The total annual cost for a scrubber (including capital recovery) based on EPA guidelines is \$2.82 million per year. If a SO<sub>2</sub> scrubbing efficiency of 85 percent is assumed (95 ton per year SO<sub>2</sub> reduction), a control cost of \$29,700 per ton of SO<sub>2</sub> is calculated. This is not a cost effective control alternative.

Another SO<sub>2</sub> control technology recently brought to our attention by FDEP (correspondence dated April 22, 1999) is a dry scrubbing technology developed by Environmental Elements Corporation. The system consists of a fluidized-bed of a lime-based material through which a gas stream containing SO<sub>2</sub> passes. The fluidized-bed, when employed on power plants, is followed by an electrostatic precipitator which removes lime and flyash from the gas stream before discharge to the atmosphere. The lime recovered in the precipitator is recirculated through the fluidized-bed with a fraction of the lime continuously bled off as waste.

In the Suwannee American plant, the precipitator following the kiln and raw mill collects particulate matter that is returned to the blending silo and then to the preheater as kiln feed. This material consists of about 10 percent of the preheater feed. The installation of a fluidized-bed SO<sub>2</sub> scrubbing system upstream of the precipitator poses two problems. First, the lime introduced by the fluidized-bed scrubbing system will make it extremely difficult to maintain the required raw meal mix in the blending silo. Secondly, even if the composition of the raw meal could be maintained, the SO<sub>2</sub> recovered in the dry scrubbing system as calcium sulfate or sulfite will be reintroduced to the kiln system. As calcium sulfate and sulfite decompose in the range of 1500-1550°F, the sulfur will again be released between the base of the preheater and the kiln inlet. As this zone will be oxygen starved (because of the multi-stage combustion for NOx control), the sulfur will form deposits which could lead to plugging of the preheater. If sufficient oxygen happened to be available, the sulfur would again form SO<sub>2</sub> which will again have to be scrubbed. It is quite apparent that the dry

scrubbing technology with the scrubber preceding the kiln precipitator is not a feasible technology.

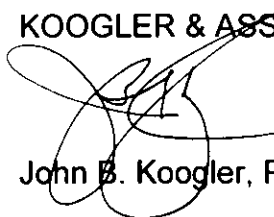
The second alternative would be to install the dry scrubbing technology downstream of the kiln precipitator. In this case, the fluidized-bed scrubbing system and a second precipitator would be required. Without conducting a rigorous cost analysis, it is quite apparent that the cost associated with a fluidized-bed scrubber and a second precipitator would not be cost effective for controlling a gas stream with only 25-30 pounds of SO<sub>2</sub> per hour.

It is our professional opinion that the SO<sub>2</sub> limit proposed by Suwannee American of 0.28 pounds per short ton of clinker represents the most cost effective and reasonable control technology available and is BACT for the proposed project.

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

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:wa

- c: Mr. Frank Darabi  
Mr. Tom Reeves, Anderson Columbia  
Mr. Segundo Fernandez, Oertel, Hoffman et al  
Mr. Ken Oertel, Oertel, Hoffman et al

cc: EPA  
NPS  
NED

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 28-Apr-1999 09:54am  
**From:** Mark Latch TAL  
LATCH\_M@EPIC6A1@EPIC9  
**Dept:** Recreation/Parks  
**Tel No:** SC 278-8666

**To:** Joseph Kahn TAL ( KAHN\_J@A1@DER )  
**CC:** Fran Mainella TAL ( MAINELLA\_F@EPIC6A1@EPIC9 )  
**CC:** Michael Bullock TAL ( BULLOCK\_M@EPIC6A1@EPIC9 )  
**CC:** Dana Bryan TAL ( BRYAN\_D@EPIC6A1@EPIC9 )  
**CC:** Torrey Johnson GNSV ( JOHNSON\_T@EPIC6A1@EPIC9 )

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

Thanks. Do you have any schedule yet? Please let me know so that I can pass the information on to the Div. Office.

m1  
04/28

The applicant in the latest response requested that we process the application per Section 403.0876(2)(a), F.S., so it doesn't really matter if the file is complete. (The applicant did provide some response anyway to several of the requested items, but not all. I'll make sure we send you a copy.) The clock therefore has started, and we cannot stop the clock by asking for additional information.

We wrote two other letters to the applicant asking for comments about a comment from the federal land manager regarding wet scrubbing for sulfur dioxide and about another control technology for sulfur dioxide emissions, but the applicant is not required to respond to either letter. They are not timely requests for additional information, and the applicant has requested we process the application given the information we have.

# INTEROFFICE MEMORANDUM

**Date:** 27-Apr-1999 09:33am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Clair Fancy TAL ( FANCY\_C )

**Subject:** Performance Bonds

This morning I discussed the issue of performance bonds and other financial mechanisms (CDs, trust funds, etc.) with Fred Wick of the Division of Waste. He told me that the primary reason the Department requires posting of a financial surety is to provide for closure of a facility that would have an increased public health or environmental risk if the facility is not properly closed or is abandoned. In other words, the bond is set for an amount equal to the cost of closure and would include the cost of cleanup if contamination of the property is likely. The bond amount would account for cases where the property, if improperly closed or abandoned would have little or no residual value. A landfill is a good example of this. A facility with a residual value, particularly one that another company could take over and operate would not typically require a surety bond, or would require much less of a bond than a site that is "worthless" when abandoned. Financial mechanisms that are required for closure of solid waste facilities and hazardous waste treatment and disposal sites are examples that offer protection against improper closure or abandonment.

Financial mechanisms are also required to guarantee long term care and maintenance of a facility that poses a public health risk if not properly monitored and maintained. Landfills are an example of this, and Fred also mentioned gypsum stacks, which could be considered to fall in this category.

Another less frequent use of a bond is to guarantee that some permitted activity will be completed. The financial mechanisms the Department requires for completion of wetlands mitigation and mine land reclamation are examples of this.

Fred told me that we do not require bonds to ensure proper operation of permitted facilities, and we do not have a precedent for bonding of air emissions sources, regardless of potential emissions. Two examples he had to illustrate this point are fossil fuel fired power plants and municipal waste combustors, neither of which is required to post a bond, although they are large emissions sources of combustion pollutants similar to the proposed Suwannee American Cement plant.

Fred did mention that Perry Odom has an attorney on his staff, Jonathan Alden, who is familiar with these financial mechanisms.

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

- 1. Fran Marnella
- 2. Mike Bullock
- 3. Torrey Johnson
- 4. Dana
- 5. Joe Kahr

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE \_\_\_\_\_

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

COMMENTS:

MS-5505

RECEIVED

APR 26 1999

BUREAU OF  
AIR REGULATION

TO: File: Ichetucknee Cement Plant

FROM: Mark Latch, Environmental Administrator  
Bureau of Natural and Cultural Resources

Date: April 21, 1999

SUBJECT: Meeting with the Division of Air Resources

I met with Joe Kahn and Cleve Holladay from Air Resources (Air) and Jim Stevenson from Ecosystem Management (EM) concerning the cement plant proposed by Suwannee American Cement Company in Suwannee County. Joe Kahn is the project manager and Cleve Holladay is the meteorologist for Air.

The cement plant is proposed on 80 acres located within 700 acres of limestone reserves at the Branford quarry of Suwannee Anderson Cement Company (Anderson). State permits required are a Prevention of Significant Discharge of Air Quality permit (PSD) from the Air program and an environmental resource permit (ERP) from the Suwannee River Water Management District (WMD) or the Department.

The application for the PSD is being processed by Joe Kahn and is incomplete as of April 20, 1999. The PSD is a program that has adopted most EPA standards. The main concerns of the program are NOx and particulate emissions. The modeling that has been done indicated that the emissions would barely be discernible when compared to the background and when combined with the background are well below the standards. The emission standards that are expected to be imposed on this facility through the permit would be some of the most stringent in the country.

Total mercury (Hg) emissions from the plant are expected to total 20 lb./yr. The input of Hg to the plant is expected to be approximately 129 lb./yr., including fuels and raw materials. Hg could be eliminated totally if the plant burned natural gas, with a 30% increase in NOx emissions. The applicant has chosen to keep the NOx levels low.



Other notes of interest:

- FAC Rule 62-4 allows consideration of compliance history when evaluating permit applications. OGC is evaluating the applicability of these provisions to this case.
- There will be approximately 260 truck trips/day to the plant.
- Modeling indicates that particulate deposition and visibility impairment at the park will be negligible.
- Air could not require monitoring devices to be placed at the park as part of the permit, unless the applicant agreed to do so voluntarily. The stations would cost approximately \$40,000 to monitor for NOx and particulates, and \$1,000/yr. to operate.
- Air expects to go to a hearing no matter what their final evaluation.

ML/dw

cc: Joe Kahn  
Fran Mainella  
Mike Bullock  
Dana C. Bryan  
Torrey Johnson

h:\users\latch\_m\mark\miscmemo\cemIch

# INTEROFFICE MEMORANDUM

**Date:** 26-Apr-1999 07:50am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Mark Latch TAL ( LATCH\_M@EPIC6A1@EPIC9 )

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

The applicant in the latest response requested that we process the application per Section 403.0876(2)(a), F.S., so it doesn't really matter if the file is complete. (The applicant did provide some response anyway to several of the requested items, but not all. I'll make sure we send you a copy.) The clock therefore has started, and we cannot stop the clock by asking for additional information.

We wrote two other letters to the applicant asking for comments about a comment from the federal land manager regarding wet scrubbing for sulfur dioxide and about another control technology for sulfur dioxide emissions, but the applicant is not required to respond to either letter. They are not timely requests for additional information, and the applicant has requested we process the application given the information we have.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 23-Apr-1999 12:26pm  
**From:** Mark Latch TAL  
LATCH\_M@EPIC6A1@EPIC9  
**Dept:** Recreation/Parks  
**Tel No:** SC 278-8666

**To:** Joseph Kahn TAL ( KAHN\_J@A1@DER )  
**CC:** Dana Bryan TAL ( BRYAN\_D@EPIC6A1@EPIC9 )

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

Please let me know if you determine that the file is complete and the clocks start ticking.

ml  
04/23

# INTEROFFICE MEMORANDUM

**Date:** 22-Apr-1999 04:51pm  
**From:** Dana Bryan TAL  
BRYAN\_D@EPIC6A1@EPIC9  
**Dept:** Recreation/Parks  
**Tel No:** 850/488-8666

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

When you confirm, please forward this to Jim S., Pam McVety, Diana Sawaya-Crane and advise Mike B. Thanks. - DCB

<<I am trying to confirm, but I think this means that the permitting time clock <<started ticking yesterday.

<<

<<ml

<<04/22



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

April 22, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joe Anderson, III  
President  
Suwannee American Cement Company, Inc.  
PO Box 410  
Branford, Florida 32008

Re: BACT Determination for Sulfur Dioxide  
DEP File No. 1210465-001-AC (PSD-FL-259)  
Proposed Portland Cement Plant

Dear Mr. Anderson:

On April 21, 1999 the Department received your response to the Department's letter of March 26, 1999 requesting additional information. In your response you requested the Department begin processing your permit application under Section 403.0876(2)(a), F.S. The Department will process your application in accordance with that provision.

On April 19, 1999, the Department forwarded comments from the federal land manager requesting an evaluation of the economic feasibility of a wet scrubber for sulfur dioxide control. The Department suggests that you provide a response to that request because the Department will consider the federal land manager's comments in the Department's BACT determination. The Department has also learned of a circulating dry scrubber process that has been licensed by Environmental Elements Corporation for sulfur dioxide control. The Department will also evaluate this process in its BACT determination, and we invite you to provide comments about the feasibility of this technology to your project. This is not a request for additional information pursuant to Rule 62-4.055, F.A.C.

If there are any questions about this matter, please call me at 850/921-9519.

Sincerely,

Joseph Kahn, P.E.  
New Source Review Section

/jk

cc: Mr. Frank Darabi, P.E.  
Mr. Steve Cullen, P.E.  
Mr. Gregg Worley, EPA  
Mr. John Bunyak, NPS  
Mr. Chris Kirts, NED  
Mr. Jim Stevenson, DEP  
Ecosystem Mgmt.  
Mr. Tom Workman, DEP  
Recreation & Parks  
Mr. Mark Latch, DEP  
Recreation and Parks

Ms. December McSherry  
Mr. Svenn Lindsfold  
Mr. Tom Greenhalgh  
Mr. Al Mueller  
Mr. Dave Bruderly  
Mr. Chris Bird, Alachua  
County DER  
Mr. John Mousa, Alachua  
County DER

Mr. Chuck Clemons,  
Chairman, Alachua County  
Commissioners  
Mr. J. Calvin Gaddy  
Ms. Patrice Boyes, Esq.  
Ms. Kathy Cantwell  
Mr. Ralph Ashodian  
Mr. Craig Pittman  
Virginia Seacrist  
Dr. Bob and Lynn Milner

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

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:  
 Joe Anderson III, President  
 Suwannee American Cement  
 PO Box 410  
 Branford, FL 32008

4a. Article Number  
 Z 333 618 102

- 4b. Service Type
- Registered  Certified
  - Express Mail  Insured
  - Return Receipt for Merchandise  COD

7. Date of Delivery  
 4-29-99

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)  
 X 

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Z 333 618 102

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <b>Joe Anderson</b>	
Street & Number <b>3 AC P</b>	
Post Office, State, & ZIP Code <b>Branford FL</b>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<b>4-22-99</b>
<b>1210465-001-AC</b>	
<b>PSD-FL-259</b>	

PS Form 3800, April 1995

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 22-Apr-1999 03:39pm  
**From:** Mark Latch TAL  
LATCH\_M@EPIC6A1@EPIC9  
**Dept:** Recreation/Parks  
**Tel No:** SC 278-8666

**To:** Joseph Kahn TAL ( KAHN\_J@A1@DER )

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

I presume this means that your clock started ticking 4/21/99????

m1  
04/22

In order to avoid costs of photocopying and mailing, we are copying you on the attached letter via e-mail. Please let me know if you have any questions.

# INTEROFFICE MEMORANDUM

**Date:** 22-Apr-1999 09:49am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Mark Latch TAL

( LATCH\_M @ EPIC6A1 @ EPIC9 )

**Subject:** Suwannee American Response

By the way, we received a response from the applicant yesterday, but I have not had a chance to review that response yet.



# INTEROFFICE MEMORANDUM

**Date:** 22-Apr-1999 09:44am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Mark Latch TAL

( LATCH\_M@EPIC6A1@EPIC9 )

**Subject:** Re: draft memo

Just a couple of comments for you.

The mercury emissions were originally estimated to be 20 lb/yr. That estimate was later revised to state that 129 lb/yr of mercury would enter the plant through the fuels and raw materials. Burning natural gas would eliminate the contribution from fuels, but not that from raw materials, so mercury emissions can not be eliminated totally.

The cost of monitoring was what we could remember of the estimates from our monitoring group. I think the ratio of NOx monitor cost vs. PM monitor cost will vary depending on size of the PM measured, but as I recall about \$40,000 gets you both. Also, the operating cost might be \$1000 a month if an operator must be contracted.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 21-Apr-1999 09:10pm  
**From:** Mark Latch TAL  
LATCH\_M@EPIC6A1@EPIC9  
**Dept:** Recreation/Parks  
**Tel No:** SC 278-8666

**To:** Joseph Kahn TAL

( KAHN\_J@A1@DER )

**Subject:** draft memo

Joe - Please look at the attached memo and suggest any changes or additions that you think are appropriate. There is no pride of authorship involved in this document, so do what you think is necessary or makes it better. Call me (8-8666) if you have any questions or want to talk about it.

ml  
04/21

April 21, 1999

TO: File: Ichetucknee Cement Plant

FROM: Mark Latch, Environmental Administrator  
Bureau of Natural and Cultural Resources

SUBJECT: Meeting with the Division of Air Resources

I met with Joe Kahn and Cleve Holladay from Air Resources (Air) and Jim Stevenson from Ecosystem Management (EM) concerning the cement plant proposed by Suwannee American Cement Company in Suwannee County. Joe Kahn is the project manager and Cleve Holladay is the meteorologist for Air.

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Total mercury (Hg) emissions from the plant are expected to total 20 lb./yr. The expected fuel source, coal, would put approximately 120 lb./yr. of Hg into the system, except for the pollution control devices. Hg could be eliminated totally if the plant burned natural gas, with a 30% increase in NOx emissions. The applicant has chosen to keep the NOx levels low.

Other notes of interest:

- FAC Rule 62-4 allows consideration of compliance history when evaluating permit applications. OGC is evaluating the applicability of these provisions to this case.
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- Modeling indicates that particulate deposition and visibility impairment at the park will be negligible.
- Air could not require monitoring devices to be placed at the park as part of the permit, unless the applicant agreed to do so voluntarily. The stations would cost approximately \$40,000 to install, \$30,000 for NOx and \$10,000 for particulates, and \$1,000/yr. to operate.
- Air expects to go to a hearing no matter what their final evaluation.

ML/dw

cc: Joe Kahn  
Fran  
Mike  
DCB  
Torrey Johnson

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KOUGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET  
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352/377-5822 ■ FAX/377-7158

RECEIVED

APR 21 1999

BUREAU OF  
AIR REGULATION

April 20, 1999

Mr. Joseph Kahn, P.E.  
Division of Air Resources Management – New Source Review  
**Department of Environmental Protection**  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Subject: Suwannee American Cement Company  
DEP File No.: 1210465-001-AC (PSD-FL-259)  
Response to Request for Additional Information  
Dated March 26, 1999

Dear Mr. Kahn:

This letter shall respond to the referenced request. All of your information request items have been reproduced, preserving your numbering. Responses follow each item.

I am certifying the attached response by certifying this transmittal letter. If you have any further questions, please contact me.

Sincerely,

Steven C. Cullen, P.E.  
Koogler & Associates

CC: EPA  
NPS  
J. Brown, OGC  
C. Holladay, BAR  
File

1. We received additional comments from the federal land manager regarding response items 23 and 24. Please respond to the following comments.

The recommendations of the Interagency Workgroup on Air Quality Modeling (at: <http://www.epa.gov/scram001/>; "Model Support"; 6<sup>th</sup> Modeling Conference"; "IWAQM") clearly state that "[i]f hourly relative humidity values are not available, assume that the relative humidity is 95%." (Appendix B, "Method", 3b). The applicant's use of an 80% RH value is not acceptable.

**Response:** The applicant notes that the matters inquired of in this request are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department begin processing the permit application under Section 403.0876(2)(a), F.S.

However, in a continuing effort to be responsive to the concerns behind the questions asked, the applicant submits the following information, provided the submittal does not affect the permit processing time clock.

The suggested RH value of 95% is from a 1993 document "IWAQM" (app. B Method 3b). The applicant's consultant, however, has personally contacted John Notar, Meteorologist, National Park Service, who advised, on March 29, 1995, that the proper way to address visibility is to use a 24 hour average for emissions and an 80% RH value in Florida. Since that time, these values have been consistently applied to applications to the FDEP without objections. There is no justification to change this approach at this time.

The Department heard significant public comment at the public meeting of March 25, 1999 regarding the following issues related to the permit application. Please respond to the following.

2. Estimate potential mercury emissions from the pyroprocessing system, and characterize the fraction of mercury that will come from the raw materials, coal, petroleum coke and tires. Please evaluate control methods for mercury emissions.

**Response:** Potential mercury emissions were submitted to the Department on February 25, 1999. Using three different approaches, the projected emissions were in all cases below the 200 pound per year threshold established by Rule 62-212.400(2)(f) and Table 212.400-2, F.A.C. as a significant emission rate increase (for PSD permitting purposes). Because the expected emissions are below the threshold amount, there is no regulatory requirement to apply BACT review for the *de minimis* emissions that are expected. Approximately 40 percent of the mercury will be contributed by fuel (coal) and 60 percent by raw materials. When petroleum coke or tires are used as fuel, the mercury contributed by fuel is expected to decrease.

3. Consider whether combustion of tires is necessary for the proposed project. There is significant public opposition to the combustion of tires in any quantity in the pyroprocessing system.

**Response:** The applicant notes that the matters inquired of in this request are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department begin processing the permit application under Section 403.0876(2)(a), F.S. However, in a continuing effort to be responsive to the concerns behind the questions asked, the applicant submits the following information, provided the submittal does not affect the permit processing time clock.

The use of tires as a supplemental fuel is a viable and proven means of conserving non-renewable fossil fuel resources and a very effective way of disposing of a troublesome solid waste material. The public opposition to the combustion of tires is based on a misperception, not a demonstrated problem. The combustion of tires at this facility will bear no resemblance to the open burning of tires. A review of test data and other scientific literature related to the use of tires as a fuel demonstrates that tire-derived fuel burns cleaner (with less emissions) than coal. Consistent with these findings, the Department (through the Solid Waste Section) supports the use of tires as fuel in cement kilns and the Department's Division of Air Resources Management has permitted cement kilns in Florida (under construction and in operation) to utilize tires and tire-derived fuel. Furthermore, more than 30 percent of the currently operating cement kilns in the U.S. are using tires or tire-derived fuel as partial replacement for other fuels. Based on all available information and Department policy related to the use of tires as fuel, it makes good sense to burn tires as a supplemental fuel if they are available.



4. Provide an estimate of emissions from truck traffic associated with operating the proposed plant. This appears to be a particular concern to the public because there is no available rail line in existence to the proposed location.

**Response:** The applicant notes that the matters inquired of in this request are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department begin processing the permit application under Section 403.0876(2)(a), F.S.

5. Regarding the MACT assessment, evaluate the applicability of meeting the dioxin emissions of the best controlled source.

**Response:** The Clean Air Act, at Section 112(d), discusses the National Emission Standards for Hazardous Air Pollutants from source categories. The EPA Administrator is charged with promulgating emissions standards applicable to new or existing sources of hazardous air pollutants and requiring the maximum degree of reduction in emissions of the hazardous air pollutants. In doing so, the Administrator is to take into consideration the cost of achieving such emission reduction, and any non-air quality health and environmental impacts and energy requirements, and must determine that the standard is achievable for new or existing sources in the category or subcategory to which the emission standard applies.

Section 112(d)(3) describes the requirements for emission standards for new sources as:

*The maximum degree of reduction in emissions that is deemed achievable for new sources in a category or subcategory shall not be less stringent than the emission control that is achieved in practice by the best controlled similar source, as determined by the Administrator. [emphasis added]*

Therefore, compliance with the MACT standard for new cement plants is the level of emission control that is achieved in practice by the best controlled similar source.

The Administrator has determined that the control technology of the best controlled similar dry process cement plant is the reduction of kiln exhaust gas temperature at the particulate matter control device inlet<sup>1</sup>. The Administrator further determined that dioxin emissions levels achieved with activated carbon injection (on other “potentially similar sources”) are expected to be about the same as that achieved with temperature reduction.

To achieve the control system temperatures that are consistent with MACT requirements in the Suwannee American Cement plant, with the plant operating in the direct mode (bypassing the raw mill), the gas stream leaving the preheater tower will be cooled to approximately 300° F in a quench tower prior to entering the kiln electrostatic precipitator. When the plant is operating in the compound mode (with the raw mill operating), the hot gases from the preheater pass through the raw mill drying the raw feed. In this mode of operation, the temperature of the gas stream is reduced to approximately 230° F prior to entering the kiln electrostatic precipitator. In both cases, the inlet temperature to the kiln electrostatic precipitator is well below temperatures associated with the formation of dioxins and furans. These operating practices are consistent with achievement of the MACT standard promulgated by EPA for Portland

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<sup>1</sup> Preamble to Proposed NESHAP for the Portland Cement Manufacturing Industry. March 24, 1998. U.S. Environmental Protection Agency.

cement plants.

6. Estimate  $PM_{2.5}$  emissions from the plant and characterize the nature of these emissions, particularly as compared to the  $PM_{10}$  emissions.

**Response:** The applicant notes that the matters inquired of in this request are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department begin processing the permit application under Section 403.0876(2)(a), F.S. However, in a continuing effort to be responsive to the concerns behind the questions asked, the applicant submits the following information, provided the submittal does not affect the permit processing time clock.

Based on EPA estimates (Compilation of Air Pollutant Emission Factors, EPA Publication AP-42, Version 5, January 1995), 50-60 percent of  $PM_{10}$  from Portland cement plants is  $PM_{2.5}$ . The nature of these particles ranges from raw materials such as limestone, sand and clay through the intermediary products to finished cement. Some portion of the particulate matter will be products of combustion and some portion will be post-combustion products.

7. Consider installing ambient monitors for  $PM_{2.5}$  and ozone in locations appropriate for assessing the impacts of the proposed plant at the Ichetucknee Springs State Park and the area around the site.

**Response:** The applicant notes that the matters inquired of in this request are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department begin processing the permit application under Section 403.0876(2)(a), F.S.

However, in a continuing effort to be responsive to the concerns behind the questions asked, the applicant submits the following information, provided the submittal does not affect the permit processing time clock.

Table 62-212.400-3, FAC provides *de minimis* ambient concentrations for various pollutants. The gathering of ambient air quality data for ozone is only required for facilities with volatile organic compound (VOC) emissions in excess of 100 tons per year. This facility is requesting a VOC permit limit of approximately 50 tons per year. Additionally, there is no regulatory requirement for PM<sub>2.5</sub> monitoring.

8. What portion of the proposed plant's NO<sub>x</sub> emissions will be deposited as nitrate through dry and wet deposition within an area 25 miles radius from the site?

Investigate pollution prevention techniques that may result in lower overall NO<sub>x</sub> emissions.

**Response:** The applicant notes that the matters inquired of in this request are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department begin processing the permit application under Section 403.0876(2)(a), F.S. However, in a continuing effort to be responsive to the concerns behind the questions asked, the applicant submits the following information, provided the submittal does not affect the permit processing time clock.

Approximately 7% or less of the plant's NO<sub>x</sub> emissions will be deposited as nitrate through dry and wet deposition within an area 25 miles radius from the site. This is

approximately 0.1 pounds per acre per year, and is less than one percent of the wet and dry background deposition measured at the Bradford Forest, near Starke, Florida.

This analysis was very conservative, as it assumed nitrate deposition between five miles and 25 miles to be equal to the deposition rate at five miles (i.e., there was no credit taken for the decrease in deposition rate with distance beyond five miles). This approach is also conservative in that it assumed all NO<sub>x</sub> from the plant would immediately convert to nitrate and be available for deposition. This is a worst case assumption.

Pollution prevention operating procedures that may result in lower overall NO<sub>x</sub> emissions are being evaluated. One technique planned for the facility is the stockpiling of limestone to allow natural drainage before pyroprocessing. Lower material moisture contents allow for the use of less fuel and hence, less NO<sub>x</sub>.

9. Describe the compliance history of the applicant with respect to violations of any Department rules at any installation.

**Response:** The applicant notes that the matters inquired of in this request are not related to those matters allowed under Section 403.0876(1), F.S., and therefore requests that the Department begin processing the permit application under Section 403.0876(2)(a), F.S. However, in a continuing effort to be responsive to the concerns behind the questions asked, the applicant submits the following information, provided the submittal does not affect the permit processing time clock.

Suwannee American Cement Company is the applicant for this permit, and was founded in 1998 and has no history of violations of any Department rules.

Mr. Joe Anderson, III is the President of Suwannee American Cement Company and is also associated with the following business entities:

<u>Company Name</u>	<u>Years in Business</u>
Anderson Mining Corporation	22
Anderson Materials, Inc.	2
Anderson Columbia Environmental	10
Anderson Columbia Co., Inc./Columbia Paving	11

Anderson Mining Corporation signed an industry wide consent order on April 11, 1995, (OGC 95-0776). It admitted to no violations. Anderson Materials has no record of violations or any cases pending with the Department. Anderson Columbia Environmental was involved with the Department in a case in Escambia County that ended with a Consent Agreement signed in 1994.

Anderson Columbia Co., Inc., owns and operates eleven asphalt plants throughout the State of Florida. Anderson Columbia in the past years has signed two Consent Agreements related to their Bagdad, Florida site. The first, dated April 18, 1997, dealt with the operation of a concrete crusher that was operated in Bagdad. The other consent agreement was an attempt to resolve contested issues regarding submerged lands at the

Bagdad site. After this consent order was signed, the DEP revoked it. As a result of that, it is not presently in effect; those issues are in litigation as part of a lawsuit pending in Santa Rosa County. The above is a summary; the DEP has records on all the above.

Suwannee American Cement intends to operate the proposed facility in accordance with all applicable local, state, and Federal regulations, and intends to be a good corporate citizen.

# INTEROFFICE MEMORANDUM

COPY  
STE KAHN →  
Jim P

**Date:** 20-Apr-1999 10:07am  
**From:** Mollie Palmer TAL  
PALMER\_M@EPIC5A1@DER  
**Dept:** Executive Offices  
**Tel No:** 850/488-4805

**To:** Howard Rhodes TAL ( RHODES\_H@A1@DER )  
**CC:** Cheryl Bakker TAL ( BAKKER\_C@EPIC5A1@DER )  
**CC:** Clair Fancy TAL ( FANCY\_C@A1@DER )

**Subject:** Suwannee-American

Howard -- sorry to keep you on hold -- David's calls are usually short but he had several items this time! One of them was that he wants a briefing on Suwannee-American. Cheryl will be scheduling with you but following are some specific issues he asked about in addition to basic background on the issue: what are our options? background on the company -- their track record, have they been good corporate citizens? can we take into account past actions in a current permit decision? are there any laws or rules that allow us to be more protective in permitting when state lands might be affected?

thanks, mollie





# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

April 19, 1999

Dr. Michael Samuels  
Box 910  
Ft. White, FL 32038

Re: Suwannee American Cement Company

Dear Dr. Samuels:

Per your request of April 14<sup>th</sup> to Mr. Clair Fancy, I have summarized the emissions information about this proposed project based on emissions estimates and limits proposed by the applicant. To date, the application is not yet complete because we are awaiting additional information from the applicant.

The applicant's request is to construct a dry process preheater/precalciner type Portland cement plant that will have the capacity to produce up to 2300 tons/day of clinker, which can produce up to 1,191,360 tons/year of Portland cement. The applicant has proposed to burn 5.2 tons of tires or tire derived fuel per hour. A rule from our waste division specifies there are 100 passenger tires per ton, so the applicant's proposal represents the combustion of 520 passenger tires per hour.

The applicant has estimated emissions from the facility, in tons per year, as approximately:

PM <sub>10</sub>	168
PM	197
SO <sub>2</sub>	118
NO <sub>x</sub>	1260
CO	1511
VOC	50
Sulfuric acid mist	6
Fluorides	0.38

And, for the following pollutants, in pounds per year:

Lead	60
Mercury	129
Beryllium	0.6
Dioxin	0.002

Mr. Fancy mentioned to me that you had inquired about EPA's data on dioxin emissions from cement kilns. At Mr. Fancy's request, I have included from EPA's preamble to the federal proposed rule for Portland cement manufacturing (40 CFR 63, Subpart LLL) a copy of Table 8, which summarizes dioxin emissions for cement kilns burning conventional fuels and non-hazardous wastes, including tires.

Please contact me at 850-921-9519 if you have any questions about the above.

Sincerely,

Joseph Kahn, P.E.  
New Source Review Section

/jk

enclosure

Table 8. Average Dioxin/Furan Toxic Equivalent Emissions (at 7 Percent Oxygen) and Average Stack Gas Temperatures for NHW Cement Kilns and Kilns Tested Under NHW Conditions [Docket Item II-B-78]

Kiln type	APCD type	Kiln fuel	Avg Gas T (deg. F)	Avg TEQ ng/dscm	Kiln location
PH/PC	FF	Natural gas; main stack tested.	183	0.011	Capital Aggregates - San Antonio TX.
PC	FF	Coal, tires, pulp/paper mill sludge.	220 *	0.0063	Calaveras Cement - Redding CA.
PH/PC	FF	Natural gas; raw mill on	221	0.042	Ash Grove - Seattle WA (kiln in-line mill).
PH/PC	ESP	Not reported	226	0.00087	RMC Lonestar - Davenport CA.
PC	FF	Coal & tires	233 *	0.21	Calaveras Cement - Redding, CA.
PH/PC	FF	Natural gas; bypass stack tested.	299	0.054	Capital Aggregates - San Antonio TX.
WET	ESP	Coal	305	0.0024	Holnam-Florence CO.
WET	ESP	Coal & natural gas	315	0.072	Ash Grove - Montana City MT.
WET	ESP	Coal	346 **	0.37	Lehigh - Union Bridge MD.
WET	ESP	coal & tires	358 **	1.2	Lehigh - Union Bridge MD.
WET	ESP	Coal/coke	366	0.032	Holnam kiln #1 - Holly Hill SC.
DRY	FF	Coal, gas, tire derived fuel.	396	0.0035	Riverside--Oro Grande CA.
WET	ESP	Natural gas	397	0.020	Capital Aggregates - San Antonio TX.
DRY	FF	Coal & natural gas	403	0.0084	Riverside--Oro Grande CA.
WET	ESP	Coal	417	0.12	Lone Star--Greencastle IN.
WET	ESP	Coal/coke	418	0.04	Holnam kiln #2--Holly Hill SC.
DRY	ESP	Coal, coke, & tires	450	0.074	Lone Star--Oglesby IL.
WET	ESP	Coal	482	0.55	Continental Cement--Hannibal MO.
WET	ESP	Coal	518	1.0	Holnam - Clarksville MO.

Abbreviations:

PH/PC = preheater/precalciner.

ESP = electrostatic precipitator.

PC = precalciner.

FF = fabric filter.

Note: Entries flagged with \* and \*\* are listed in Table 9 and discussed in the text.

RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

Joe Anderson, Pres.  
 Sumner American  
 Cement Co.  
 PO Box 410  
 Branford, FL  
 32008

4a. Article Number

2333 618 098

4b. Service Type

- Registered  Certified
- Express Mail  Insured
- Return Receipt for Merchandise  COD

7. Date of Delivery

4-26-99

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)

X *[Handwritten Signature]*

PS Form 3811, December 1994

102595-97-B-0179

Domestic Return Receipt

Thank you for using Return Receipt Service.

Z 333 618 098

US Postal Service

**Receipt for Certified Mail**

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
Joe Anderson	
Street Number	
3 ACC	
Post Office, State, & ZIP Code	
Branford FL	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
1210465-001-AC 4-19-99	
PSD-FI-259	

PS Form 3830, April 1995



# Department of Environmental Protection

Jeb Bush  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

April 19, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joe Anderson, III  
President  
Suwannee American Cement Company, Inc.  
PO Box 410  
Branford, Florida 32008

Re: Request for Additional Information  
DEP File No. 1210465-001-AC (PSD-FL-259)  
Proposed Portland Cement Plant

Dear Mr. Anderson:

On February 25, 1999 the Department received your response to the Department's requests for additional information. The application is still incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. We received additional comments from the federal land manager regarding response item 27. Please respond to the enclosed comments.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. If there are any questions, please call me at 850/921-9519.

Sincerely,

Joseph Kahn, P.E.  
New Source Review Section

/jk

enclosure

cc: Mr. Frank Darabi, P.E.  
Mr. Steve Cullen, P.E.  
Mr. Gregg Worley, EPA  
Mr. John Bunyak, NPS  
Mr. Chris Kirts, NED  
Mr. Jim Stevenson, DEP  
Ecosystem Mgmt.  
Mr. Tom Workman, DEP  
Recreation & Parks  
Ms. December McSherry

Mr. Svenn Lindsfold  
Mr. Tom Greenhalgh  
Mr. Al Mueller  
Mr. Dave Bruderly  
Mr. Chris Bird, Alachua  
County DER  
Mr. John Mousa, Alachua  
County DER

Mr. Chuck Clemons,  
Chairman, Alachua County  
Commissioners  
Mr. J. Calvin Gaddy  
Ms. Patrice Boyes, Esq.  
Ms. Kathy Cantwell  
Mr. Ralph Ashodian  
Mr. Craig Pittman  
Virginia Seacrist  
Dr. Bob and Lynn Milner

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

# INTEROFFICE MEMORANDUM

**Date:** 16-Apr-1999 06:11pm  
**From:** Ellen\_Porter  
Ellen\_Porter@nps.gov@PMDf@EPIC66  
**Dept:**  
**Tel No:**

**To:** Kahn\_J ( Kahn\_J@A1@DER )  
**CC:** Don\_Shepherd ( Don\_Shepherd@nps.gov@PMDf@EPIC66 )  
**Subject:** Fwd[2]:Suwannee American Cement

Joe, when I sent this message to Al, I got a return message saying Al was on vacation and messages should be sent to you. If you have questions, call Don Shepherd at (303) 969-2075.

Ellen Porter  
Environmental Specialist  
U.S. Fish and Wildlife Service Air Quality Branch  
(303) 969-2617

Forward Header

**Subject:** Fwd:Suwannee American Cement  
**Author:** Ellen Porter  
**Date:** 04/16/1999 2:48 PM

Al, Don Shepherd has reviewed the additional information submitted by Suwannee American Cement and has the following comments:

I agree with Suwannee's conclusion that SNCR is not compatible with its proposed strategy to limit NOx emissions through combustion control techniques, and I agree that the Suwannee approach would result in lower NOx emissions. Therefore, I believe that Suwannee's proposal represents BACT for this kiln for NOx emissions.

However, Suwannee has not evaluated the economic feasibility of adding a scrubber for SO2 as has been proposed by Holnam Cement in Colorado. Suwannee maintains that their emissions would already be very low and that the environmental impacts of a wet scrubber would outweigh the benefits of SO2 reduction. However, Suwannee is required by the BACT "top down" process to evaluate the highest level of SO2 control for its technical, economic, and environmental feasibility, and Suwannee has not done so. Unless Suwannee can demonstrate why it is not technically feasible to install a scrubber, is too expensive, or has unacceptable environmental impacts when compared to Holnam Cement, it must choose the scrubber option. Suwannee should be advised to conduct a full analysis of the feasibility of adding a scrubber to this project.

Don Shepherd, P.E.

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 14-Apr-1999 01:10pm  
**From:** Mark Latch TAL  
LATCH\_M@EPIC6A1@EPIC9  
**Dept:** Recreation/Parks  
**Tel No:** SC 278-8666

**To:** Dana Bryan TAL ( BRYAN\_D@EPIC6A1@EPIC9 )  
**To:** James Stevenson TAL ( STEVENSON\_J@EPIC6A1@EPIC9 )  
**CC:** Joseph Kahn TAL ( KAHN\_J@A1@DER )

**Subject:** Suwannee Co. cement plant near Ichetucknee

I just spoke with Joe Kahn, project manager in the Air Program, about setting up a meeting. The agreed upon time is 4/20/99 at 130 pm at their office on Magnolia.

ml  
04/14

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 14-Apr-1999 10:48am  
**From:** Mark Latch TAL  
LATCH\_M@EPIC6A1@EPIC9  
**Dept:** Recreation/Parks  
**Tel No:** SC 278-8666

**To:** Dana Bryan TAL ( BRYAN\_D@EPIC6A1@EPIC9 )  
**CC:** James Stevenson TAL ( STEVENSON\_J@EPIC6A1@EPIC9 )  
**CC:** Joseph Kahn TAL ( KAHN\_J@A1@DER )

**Subject:** Suwannee Co. cement plant near Ichetucknee

I spoke with Joe Kahn, project manager in the Air Div., about this project. In summary:

- the application is incomplete pending receipt of material from the applicant in response to the request for information that was sent
- it is expected that the applicant will supply the information this week or early next to make the appl. complete. That will start the time clocks.
- the application is for a permit under the Prevention of Significant Deterioration permit program. This is a delegated federal program.
- once the evaluation is complete, Air will evaluate the application relative to the standards, and issue an Intent, probably an ITI according to Joe.
- the way to challenge the permit is through DOAH and then District Court of Appeals. There is no appeal to the Gov. and Cab.
- There is no public interest test in the review.

Joe offered to meet with R&P to discuss the process, review the materials, etc. I told him that I would call him back to arrange a time to go to his office so he would not have to transport the files.

ml  
04/14

# INTEROFFICE MEMORANDUM

**Date:** 14-Apr-1999 10:35am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Clair Fancy TAL ( FANCY\_C )  
**To:** Cleve Holladay TAL ( HOLLADAY\_C )

**Subject:** Suwannee American - DEP Rec. and Parks

I spoke this morning with Mark Latch of Recreation and Parks (8-8666) about the status of the Suwannee American Cement permit application. We have agreed to have a meeting of the technical staff to review the permit application so that Rec. and Parks staff can become familiar with the emissions estimates and impacts analysis. Mark will work with me to schedule that meeting for perhaps Monday or Tuesday of next week. Cleve, please keep this in mind so that you can attend with me. Thanks.



# INTEROFFICE MEMORANDUM

**Date:** 09-Apr-1999 01:13pm  
**From:** Shari Naftzinger TAL  
NAFTZINGER\_S@EPIC5A1@DER  
**Dept:** Executive Offices  
**Tel No:** 850/487-2916

**To:** Joseph Kahn TAL ( KAHN\_J@A1@DER )  
**CC:** Mary Fillingim TAL ( FILLINGIM\_M@A1@DER )

**Subject:** Re: Contact with Legislator's Staff

Thanks. For some reason I am unable to view/print your attachment. Please send me a hard copy, along with a copy of the letter you received. Appreciate it.

Shari

^Pat Kennedy of our air division director's office advised me that you are the  
^contact to report contacts with legislators or their staff.  
^

^I received a letter dated March 31, 1999 from a legislative assistant to  
^Senator Burt L. Saunders forwarding information from one of his constituents,  
^Mr. Jack Gaddy, about a site formerly used for mining hard rock phosphate.  
^This site is adjacent to the site of a cement plant proposed by Suwannee  
^American Cement Company in Suwannee County. I am currently reviewing an  
^application for an air construction permit for this facility. I had  
previously  
^spoken with Mr. Gaddy and referred his information to other department staff  
^who could address his concerns. I sent the attached response to Sen.  
Saunders'  
^assistant describing the action taken. Please let me know if you need any  
^further information.

# INTEROFFICE MEMORANDUM

**Date:** 09-Apr-1999 07:37am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Shari Naftzinger TAL ( NAFTZINGER\_S @ EPIC5A1 @ DER )

**Subject:** Contact with Legislator's Staff

Pat Kennedy of our air division director's office advised me that you are the contact to report contacts with legislators or their staff.

I received a letter dated March 31, 1999 from a legislative assistant to Senator Burt L. Saunders forwarding information from one of his constituents, Mr. Jack Gaddy, about a site formerly used for mining hard rock phosphate. This site is adjacent to the site of a cement plant proposed by Suwannee American Cement Company in Suwannee County. I am currently reviewing an application for an air construction permit for this facility. I had previously spoken with Mr. Gaddy and referred his information to other department staff who could address his concerns. I sent the attached response to Sen. Saunders' assistant describing the action taken. Please let me know if you need any further information.

April 9, 1999

Ms. Randi Rosete  
Legislative Assistant to Senator Burt L. Saunders  
The Florida Senate, 25<sup>th</sup> District  
Room 120 A & B  
1039 Southeast 9<sup>th</sup> Place  
Cape Coral, Florida 33904

Dear Ms. Rosete:

Thank you for your letter of March 31, 1999 referring information from Mr. Jack Gaddy regarding the use of a site previously used for mining hard rock phosphate. I am reviewing an air construction permit application from Suwannee American Cement Company for a proposed Portland cement plant on a site adjacent to Mr. Gaddy's family's property in Suwannee County. I had spoken with Mr. Gaddy shortly before receiving your letter, and I referred Mr. Gaddy's information to Howard Hayes of the Department's Environmental Resource Permitting section and to Jim Stevenson of the Department's Ecosystem Management section. I forwarded copies of information about the site from Mr. Gaddy to Mr. Hayes and Mr. Stevenson, as I understand these gentlemen are following up directly with Mr. Gaddy regarding his concerns about the site.

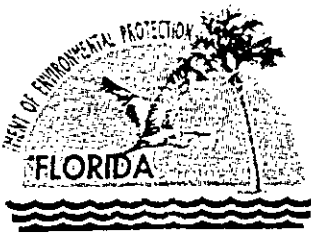
Please call me at 850/921-9519 if you have any questions or need more information.

Sincerely,

Joseph Kahn, P.E.  
New Source Review Section

/jk

cc: Howard Hayes  
Jim Stevenson



Jeb Bush  
Governor

# Department of Environmental Protection

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

David B. Struhs  
Secretary

April 9, 1999

Ms. Kandi Rosete  
Legislative Assistant to Senator Burt L. Saunders  
The Florida Senate, 25<sup>th</sup> District  
Room 120 A & B  
1039 Southeast 9<sup>th</sup> Place  
Cape Coral, Florida 33904

Dear Ms. Rosete:

Thank you for your letter of March 31, 1999 referring information from Mr. Jack Gaddy regarding the use of a site previously used for mining hard rock phosphate. I am reviewing an air construction permit application from Suwannee American Cement Company for a proposed Portland cement plant on a site adjacent to Mr. Gaddy's family's property in Suwannee County. I had spoken with Mr. Gaddy shortly before receiving your letter, and I referred Mr. Gaddy's information to Howard Hayes of the Department's Environmental Resource Permitting section and to Jim Stevenson of the Department's Ecosystem Management section. I forwarded copies of information about the site from Mr. Gaddy to Mr. Hayes and Mr. Stevenson, as I understand these gentlemen are following up directly with Mr. Gaddy regarding his concerns about the site.

Please call me at 850/921-9519 if you have any questions or need more information.

Sincerely,

Joseph Kahn, P.E.  
New Source Review Section

/jk

cc: Howard Hayes  
Jim Stevenson

# INTEROFFICE MEMORANDUM

**Date:** 07-Apr-1999 03:16pm  
**From:** Pat Kennedy TAL  
KENNEDY\_P  
**Dept:** Air Resources Management  
**Tel No:** 850/488-0114

**To:** Joseph Kahn TAL ( KAHN\_J )

**Subject:** Re: Contact for Office of Legislative Affairs

Joe - There is no actual form. You can e-mail the information to Shari Naftzinger, who works in that office and coordinates all this stuff. In this case, more is better - like the Media Hot Sheet.

Later,

Pat

<><>Pat,

<><>

<><>Do we have a form to fill out to advise the Office of Legislative Affairs about

<><>contact with a senator's office? Something like the media sheet? Or do you

<><>have someone's name to receive information by e-mail?

<><>

<><>I have to advise of a letter from Sen. Saunders' office regarding Suwannee

<><>American Cement. I'm working now on a brief response.

<><>

<><>-Joe

# INTEROFFICE MEMORANDUM

**Date:** 07-Apr-1999 09:55am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Pat Kennedy TAL (KENNEDY\_P )  
**To:** Charlotte Hayes TAL (HAYES\_C )  
**CC:** Clair Fancy TAL (FANCY\_C )  
**CC:** Kim Tober TAL (TOBER\_K )

**Subject:** Correspondence for Suwannee American

This memo is to confirm the approach decided in our meeting with Howard yesterday regarding handling public correspondence related to the Suwannee American Cement application.

Correspondence sent as an action item (correspondence control item) from the governor's office and the secretary's office will be handled using a standardized response letter similar to the one I drafted that was reviewed and edited by Pat and Howard. Charlotte will draft these letters for the governor's or secretary's signature, as appropriate.

Correspondence sent as a "handle appropriately" item from the governor's office will be handled similarly, except that Charlotte will draft these letters for Howard's signature.

E-mail from the governor's office must be responded to individually by e-mail per the governor's request. The e-mail responses will be prepared by Charlotte as a simple cover memo with an attached general response. The response will be similar to those of the above letters, but will not have a signature block, or a reference to contact the Department for further information. The cover memo will read, "The Governor has asked us to respond to e-mail message about the Suwannee American Cement Company's proposed cement plant. Attached is the Department's response to all inquiries regarding this project." E-mails from the secretary's office will be responded to similarly except the cover memo will read, "The Secretary has asked..."

Correspondence directed to me will be filed as part of the record. I will respond generally to all comments as part of the technical evaluation when that is drafted. Copies of all correspondence will be placed in the file in Kim's office so that it will be officially part of the public record.

Please let me know if what I've outlined is incorrect. Thanks for helping me out with this effort.

# INTEROFFICE MEMORANDUM

(Draft)

**Date:** 05-Apr-1999 11:04am  
**From:** Joseph Kahn TAL  
**Dept:**  
**Tel No:**

**To:** ellen\_porter@nps.gov@in  
**CC:** Kim Tober TAL (TOBER\_K)

**Subject:** Suwannee American Cement

Ellen,

Al forwarded your e-mail to me regarding the applicant's response about SNCR and wet scrubbing. We received the response late in February and forwarded a copy to NPS then. Please check to see if it ever arrived. If it didn't we'll send another copy to you. The project is incomplete and we sent another request for additional information, so we have some time for you to review these issues.

-Joe

## INTEROFFICE MEMORANDUM

**Date:** 05-Apr-1999 09:32am  
**From:** Joseph Kahn TAL  
KAHN\_J  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9519

**To:** Pat Kennedy TAL (KENNEDY\_P)  
**CC:** Clair Fancy TAL (FANCY\_C)  
**CC:** Alvaro Linero TAL (LINERO\_A)

**Subject:** Draft Response Regarding Suwannee American Cement

Pat,

Attached is a draft e-mail response for Howard to the e-mail message of March 30, 1999 to Secretary Struhs regarding Suwannee American Cement. The e-mail was forwarded to Howard by Cheryl Bakker on March 31st, and by you to me on April 1st. Please look over the attached draft and let me know of any changes that need to be made. I do not have a street address for the author of the message, so it is addressed to the e-mail address. Let me know if you need a copy of the original message.

-Joe



Date

**Ms. Julie Cirigliano**  
Via e-mail at [julie@mmerd.com](mailto:julie@mmerd.com)

Dear Ms. Cirigliano:

Secretary Struhs has forwarded your e-mail regarding the proposed Suwannee American Cement Company's plant to me for reply. Thank you for taking the time to express your concerns about this project.

Please be assured that my staff from the Department of Environmental Protection's (DEP) Division of Air Resource Management are thoroughly reviewing Suwannee American Cement Company's air construction permit application, and they will ensure that the project meets all requirements of Florida's air regulations. In fact, a draft permit will not be issued to the company until the company provides assurance that it can comply with the state and federal air pollution rules. The air permitting staff is conducting the review of this permit application pursuant to the DEP's rules for the Prevention of Significant Deterioration of air quality (PSD). This includes a determination of Best Available Control Technology (BACT), which imposes stringent emission limits that the company must meet in order to operate. The air emissions criteria of the PSD and BACT process are established by Florida and the U.S. Environmental Protection Agency to be protective of human health and the environment, and the company's emission impacts are below these criteria. The emission limits imposed by BACT for this project include some of the most stringent limits in the U.S.

I share your regard for the beautiful Ichetucknee Springs State Park and the area around the Santa Fe and Suwannee Rivers. I assure you that my staff will do everything in their legal authority to protect this wonderful ecosystem. In response to public comments received at DEP's public meeting in Branford on March 25<sup>th</sup>, my staff sent a letter to the company asking them to formally respond to the concerns expressed by the public about air quality and the permit application. These concerns include the proposal to burn tires, the emissions from truck traffic, and the impacts from particulate emissions. No further action will be taken until the company's responses to those questions are carefully evaluated.

I appreciate your comments regarding protecting the environment near the park. If you have any technical questions or need further information, please contact Joseph Kahn at the Division of Air Resource Management, Department of Environmental Protection, Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, or at 850/488-0114.

Sincerely,

Howard L. Rhodes, Director  
Division of Air Resource  
Management

HLR/jk

# INTEROFFICE MEMORANDUM

**Sensitivity:** COMPANY CONFIDENTIAL

**Date:** 05-Apr-1999 08:56am  
**From:** Alvaro Linero TAL  
LINERO\_A  
**Dept:** Air Resources Management  
**Tel No:** 850/921-9532

**To:** Joseph Kahn TAL ( KAHN\_J )  
**To:** Cleve Holladay TAL ( HOLLADAY\_C )

**Subject:** FWD: Suwannee Cement

Forward from Fish and Wildlife Service. Al.

## INTEROFFICE MEMORANDUM

**Date:** 02-Apr-1999 06:13pm  
**From:** Ellen\_Porter  
Ellen\_Porter@nps.gov@PMDF@EPIC66  
**Dept:**  
**Tel No:**

**Subject:** Suwannee Cement

We received copies of your letters (12/29/98 and 2/16/99) to Suwannee in which you asked them to respond to our comments regarding SNCR for NOX and a wet scrubber for SO2. Anything new on those issues? Have they responded?

# INTEROFFICE MEMORANDUM

**Date:** 01-Apr-1999 02:39pm  
**From:** Howard Hayes TAL  
HAYES\_H  
**Dept:** Environmental Resource Permittin  
**Tel No:** 850/488-8217 Suncom 278-8217

**To:** Joseph Kahn TAL (KAHN\_J )  
**To:** Joseph Bakker TAL (BAKKER\_J )  
**To:** Alan Whitehouse TAL (WHITEHOUSE\_A )  
**To:** Harry Neel TAL (NEEL\_H )

**Subject:** Comment Regarding Suwannee American Cement Company

This is in response to your March 31, 1999 e-mail. I talked with Mr. J. Calvin Gaddy. He has some very interesting things to say about the Anderson Mining Company mine near Bradford, and the proposed cement plant for this site. He apparently knows considerable history about this region and the mine.

1) He reports that this mine was a hard-rock phosphate mine, possibly during the 1920's and 30's. This is possible because I know that the literature lists other hard-rock phosphate mines near this site. He also stated that during the late 1940's to early 1950's he traveled to phosphate mines all over the State to record background radiation levels. He alleges that the "slag" (mine tailings) were "as hot as a fox" at the Bradford Mine. He expressed concerns about the potential for incorporation of this radioactive material into the cement that will be produced by the proposed plant. He is also concerned about the washing of this material into the mine pits (see item 2 below).

This bureau cannot deal with this product quality question. This may be within the jurisdiction of the U.S. Environmental Protection Agency, Radiation Protection Division, and/or the Florida Department of Health, Bureau of Radiation Control. The DOH does radiation monitoring at phosphate mines. I am still researching this. When I get the names and telephone numbers of points of contact, they will be forwarded to Mr. Gaddy. One of our phosphate staff has had to deal with this question before. He's in the field this week, but when he returns he may be able to give me the names.

2) Mr. Gaddy also reports that during the mining of the old pit, "a spring opened within the pit." He suspects that this conduit may be connected to local waterways and nearby sinks. This will be a concern for us when the operator applies for an environmental resource permit. They will need this permit before they expand the mine; however, they are not operating at this time, and we do not believe they need this permit for the present conditions. I will keep these notes in the file for future reference.

I will also forward Mr. Gaddy's telephone number to Jim Stevenson, DEP, Office of Ecosystem Management. The Ichetucknee Springs Water Quality Working Group might be interested in what Mr. Gaddy knows about the history of this area, and the alleged conduit in the mine pit. This Mr. Stevenson has discussed conduit problems before with this operator in connection with their mine near Columbia City.

Thank you for referring Mr. Gaddy's concerns to me. Researching this new question brighten up my normally routine workdays. If you have any questions or comments, please send an e-mail or telephone me at SUNCOM 278-8217.

Howard