
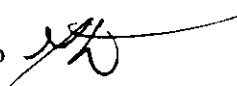


Florida Department of
Environmental Protection

Memorandum

TO: Howard Rhodes

THRU: Trina Vielhauer 
Al Linero

FROM: Greg DeAngelo 

DATE: May 6, 2003

SUBJECT: DEP File No. 1210465-004-AC (PSD-FL-259C)
Suwannee American Cement – Application for Permit Modification
Updating Permit to Reflect “As-Built” Baghouse Design and Configuration &
Clarifying CEMS Requirements

A final permit amendment letter is attached for your approval and signature.

This amendment for the Suwannee American Cement construction permit updates the permit to reflect the as-built configuration and design of the material handling baghouses. The newly designed baghouses are located across the cement plant, from raw material transfer to clinker storage to finished product loadout. In some instances, two smaller baghouses were installed where one large baghouse was originally envisioned. The converse is also true: the original design called for two baghouses but only one was later determined to be adequate.

All the baghouses are subject to the same emission limit as before (0.0085 grains/dscf). The changes to the baghouses' design temperatures and flowrates actually lower the potential emissions of PM by lowering the net dscfm. Potential PM emissions will be reduced by 6.7 tons per year.

(The emission limits and control devices on the kiln and clinker cooler remain the same as originally designed and permitted.)

This amendment also clarifies the CEMS requirements. The language is similar to that used in the recent Florida Rock production increase permit in terms of specifying what span value to use for the monitor, what approach to follow to calculate the rolling averages, and the like.

An important distinction is that the optional THC monitor is explicitly designated as a compliance monitor. The original permit clearly called for a VOC monitor; a THC monitor is acceptable so long as all of the THC (as propane) is considered VOC (as propane) for purposes of compliance. This is a conservative approach since THC will always be less than or equal to VOC.

Day 90 for this application is May 24, 2003. I recommend your approval.

Attachment

TLV/AAL/gpd



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

May 6, 2003

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Celso A. Martini, Plant Manager
Suwannee American Cement
Post Office Box 410
Branford, Florida 32008

Re: DEP File No. 1210465-004-AC (PSD-FL-259C)
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

The Florida Department of Environmental Protection (“the Department”) reviewed your application dated February 18, 2003, to update the above referenced construction permit to reflect the “as-built” design, configuration, and performance of the material handling baghouses at Suwannee American Cement. The Department notes that your application for permit modification does not affect emissions or control devices at the kiln or the clinker cooler.

As discussed in your application for permit modification, the as-built design and configuration of the material handling baghouses will result in a net reduction in the design air flow rate through the control devices (on a dry standard cubic feet per minute basis). Design temperatures and flowrates through the baghouses impact particulate matter (PM) emissions. Accordingly, the redesigned baghouse temperatures and flowrates described in the application for permit modification are specifically incorporated by reference into the permit. The application for permit modification itself forms the basis for this permitting action, and it is on file with the Department.

The Department also desires to take this opportunity to further clarify the Continuous Emission Monitoring (CEM) system requirements by including calculation procedures for the rolling and block averages, establishing appropriate span values for the monitors, and formalizing an optional approach for using a total hydrocarbon (THC) monitor to demonstrate compliance with the volatile organic compound (VOC) emission limit. No relaxation or significant change is being made to the requirement to continuously monitor and record emissions. This permitting action simply documents the Department-approved approach to performing the calculations necessary to compare the CEM system results to the permit emission limits already established.

Finally, the Department understands that the company has undergone recent reorganization. Please provide information regarding the structure and identity of the corporate entities associated with the plant. Identify which entity owns the cement plant real property and the building and fixtures versus which entity will be operating the plant. In addition, explain the relationship between these entities and any other entity that will be involved with the plant. This information will be necessary for processing

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your Title V operating permit, the application for which is due 180 days after commencing operation (i.e., 180 days after February 17, 2003, or August 16, 2003).

The existing construction permit is hereby modified as follows:

SECTION III.B - SPECIFIC CONDITION 14

14. Emissions Unit 002: Emissions unit 002 shall have the following emission points:

EMISSION POINT	DESCRIPTION
E-28	Dust collector for drops to homogenizing silo – Aeropol at the <u>homogenizing silo</u>
E-34	Dust collector for off-spec feed handling
G-07	Dust collector for homogenizing silo inlet
H-08	Dust collector for raw meal transport system <u>homogenizing silo outlet</u>

Particulate matter (PM) emissions from each emission point of emissions unit 002 shall not exceed 0.01 grains/dscf, and PM₁₀ emissions shall not exceed 0.0085 grains/dscf. Particulate matter emissions from each emission point of this emissions unit shall be controlled by a baghouse. Visible emissions from each emission point of this emissions unit shall not exceed 5% opacity.

Initial and annual compliance testing for PM emissions from this emissions unit is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version).

[Note: These emission limits effectively limit annual emissions of PM for all emission points in this emission unit to ~~6.2~~ 6.3 tons per year. PM₁₀ emissions are estimated to equal 85% of PM emissions, or 5.3 tons per year. The particulate weight emission standards and the visible emissions limit of 5% opacity are BACT.]

[Rules 62-4.070(3), 62-210.700(5), 62-212.400 and 62-297.620(4), F.A.C., BACT and applicant request]

SECTION III.B - SPECIFIC CONDITION 15

15. Emissions Unit 004: Emissions unit 004 shall have one emission point, the stack of the in-line kiln/raw mill, designated by the applicant as E-21. Particulate matter emissions from this emissions unit shall be controlled by a baghouse.

Emissions from emissions unit 004, the in-line kiln/raw mill, shall not exceed the following limits for the following pollutants: [Emissions from the natural gas fired air heater are included in the limits below]

POLLUTANT	EMISSION LIMIT		AVERAGING TIME	BASIS
PM	0.13 lb/ton of dry preheater feed	23.1 lb/hour	3 hours ³	BACT
PM ₁₀	0.11 lb/ton of dry preheater feed	19.6 lb/hour	3 hours ³	BACT
SO ₂	0.27 lb/ton of clinker	28.4 lb/hour	3 hours ⁴	BACT
NO _x	2.9 lb/ton of clinker ¹	304.5 lb/hour ¹	24 hours ⁴	BACT
CO	3.6 lb/ton of clinker	378.0 lb/hour	3 hours ⁵	BACT
VOC	0.12 lb/ton of clinker ²	12.6 lb/hour ²	30 days ⁶	BACT
VE	10% opacity		6 minutes ⁷	BACT

¹ NO_x emissions shall not exceed 3.8 lb/ton of clinker and 399.0 lb/hour during the first 12 months after initial startup. After 12 months after initial plant startup, emissions of NO_x shall not exceed the limits shown in the table. Emissions of NO_x up to 600 lb/hr for up to one hour in duration shall be allowed for each startup of the pyroprocessing system which occurs when there is no material in the kiln.

² VOC emissions shall be expressed as propane. If a total hydrocarbon (THC) monitor is used to demonstrate compliance with the VOC emissions limit as allowed pursuant to specific condition 18 of this subsection, THC emissions shall be expressed as propane.

³ The averaging times for PM and PM₁₀ correspond to the required length of sampling for the initial and subsequent emission tests.

⁴ ~~The averaging time for NO_x shall be a 24-hour rolling average that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding 23 hours computed in accordance with specific condition 18 of this subsection. The averaging time for SO₂ shall be a 3-hour rolling average that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding two hours. Each hourly average shall be computed from a minimum of one measurement every minute computed in accordance with specific condition 18 of this subsection.~~

⁵ The averaging time for CO corresponds to the required length of sampling for the initial and subsequent emission tests.

⁶ ~~The averaging time for VOC shall be a 30 calendar-day block average that shall be computed from a minimum of one measurement every minute computed in accordance with specific condition 18 of this subsection.~~

⁷ The averaging time for visible emissions shall be a 6-minute block average that shall be computed from a minimum of one measurement every 15 seconds. The 6 minute block averages shall start at the beginning of each hour.

[Note: These emission limits, along with annual production limits, effectively limit annual emissions to: PM, 92.8; PM₁₀, 78.4; SO₂, 113.4; NO_x, 1217.5; CO, 1511.1; and VOC, 50.4 tons per year. First year NO_x emissions are effectively limited to 1595.4 tons per year. NO_x emissions are estimated assuming that two startups as specified occur per year, each resulting in maximum allowable excess emissions. Mercury introduced into the pyroprocessing system is limited pursuant to specific condition 13 of this subsection of this permit; annual emissions of mercury are effectively limited by this condition to 97 pounds per year.]

[Rules 62-4.070(3) and 62-212.400, F.A.C., and BACT]

No owner or operator of a Portland Cement kiln shall cause, permit, or allow the emission of particulate matter in excess of 0.50 pounds per ton to the kiln (dry basis, excluding fuel), or visible emissions the density of which is greater than 20 percent opacity. [Rule 62-296.701(2)(a), F.A.C.]

[Note: The BACT emission limits of this permit (table above) are more stringent than the limits imposed by this rule.]

SECTION III.B - SPECIFIC CONDITION 17

17. **Emissions Unit 006:** Emissions unit 006 shall have the following emission points:

EMISSION POINT	DESCRIPTION
L-03	Dust collector for clinker transport system conveyor
L-06	Dust collector for clinker storage system silo inlet
L-25	Dust collector for gypsum/off-spec clinker transport
M-08	Dust collector for clinker transport system conveyor
M-09	Dust collector for clinker conveyor
N-09	Dust collector for finish mill air separator
N-12	Dust collector for finish mill vent
N-36	Dust collector for fringe cement silo
N-91	Dust collector for clinker grinding (finish mill)
Q-14	Dust collector for cement loading system truck loadout
Q-17	Dust collector for cement loading system truck loadout
Q-25 P-03	Dust collector for cement storage silo transport conveyor
Q-26 P-11	Dust collector for cement storage silo
R-12 Q-24	Dust collector for cement packing operation railcar loadout

Particulate matter (PM) emissions from each emission point of emissions unit 006 shall not exceed 0.01 grains/dscf, and PM₁₀ emissions shall not exceed 0.0085 grains/dscf. Particulate matter emissions from each emission point of this emissions unit shall be controlled by a baghouse. Visible emissions from each emission point of this emissions unit shall not exceed 5% opacity.

For emission points N-09 and N-12, after initial testing that demonstrates compliance with the PM limit of this condition is completed, subsequent compliance testing for PM emissions from these emission points is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. For the other emission points of emissions unit 006, initial and annual compliance testing for PM emissions from these emission points is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version).

[Note: These emission limits effectively limit annual emissions of PM for all emission points in this emission unit to ~~68.4~~ 61.3 tons per year. PM₁₀ emissions are estimated to equal 85% of PM emissions, or ~~58.1~~ 52.1 tons per year. The particulate weight emission standard and the visible emissions limit of 5% opacity are BACT.]

[Rules 62-4.070(3), 62-210.700(5), 62-212.400 and 62-297.620(4), F.A.C., BACT and applicant request]

SECTION III.B - SPECIFIC CONDITION 18

18. **Continuous Emission Monitoring Systems:** The owner or operator shall install, calibrate, maintain, and operate a continuous emission monitoring (CEM) system in the in-line kiln/raw mill stack to measure and record the emissions of NO_x, SO₂, and VOC from the in-line kiln/raw mill, in a manner sufficient to demonstrate compliance with the emission limits of this permit. ~~Compliance with the emission limit for NO_x shall be based on a 24-hour rolling average that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding 23 hours, and compliance with the emission limit for SO₂ shall be based on a rolling three-hour average that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding two hours; each hourly average shall be computed from a minimum of one measurement every minute. Compliance with the emission limit for VOC shall be based on a 30-day block average that shall be computed from a minimum of one measurement every minute. The CEM system shall express the results in units of pounds per ton of clinker produced, and pounds per hour.~~

- a. Compliance Demonstration: Compliance with the emission limit for NO_x shall be based on a 24-hour rolling average that shall be recomputed after every valid hour as the arithmetic average of that hourly average and the preceding 23 valid hourly averages. Compliance with the emission limit for SO₂ shall be based on a rolling three-hour average that shall be recomputed after every valid hour as the arithmetic average of that hourly average and the preceding two valid hourly averages. Compliance with the emission limit for VOC shall be based on a 30 calendar-day block average that shall be computed as the arithmetic average of all valid hourly averages occurring within each 30 calendar-day block.
- b. Valid Hourly Averages: Each hourly average shall be computed as the arithmetic average of the data points generated by the CEM system. Data points must be generated at least once per minute. For an hourly average to be considered valid, at least two data points separated by a period of 15 minutes or more must be used to compute the hourly average.
 - i. Hours during which there is no preheater feed and no fuel fired to the kiln systems are not valid.
 - ii. Hours during which the plant is firing fuel but producing no clinker are valid, but these hours are excluded from the production-normalized emission rate computation (pounds per ton of dry preheater feed or pounds per ton of clinker). These hours are included in any pollutant mass emission rate computation (pounds per hour).
- c. Data Availability: During each semiannual (six-month) period, CEM system valid hourly averages shall be obtained for at least 90 percent of the operating hours for which the plant is producing clinker. If the CEM system does not obtain valid hourly averages for 90 percent or more of the operating hours per semiannual period for which the plant is producing clinker, the permittee shall submit a semiannual excess emissions and continuous monitoring system performance report. This report must include corrective actions, and it shall be submitted within 30 days following the end of each semiannual reporting period.
- d. Compliance Assurance: CEM system breakdowns, malfunctions, repairs, calibration checks, zero adjustments, and span adjustments all result in periods during which CEM system data are not obtained. During such periods in excess of 120 hours per calendar quarter, the permittee shall assure compliance with the emissions standards of this permit through stack tests, alternative monitoring systems, or other methods as approved by the Department.

- e. THC Monitor: At the option of the permittee, a total hydrocarbon (THC) monitor can be installed in place of the required VOC monitor provided that the monitor results ("THC as propane") are considered to be VOC ("VOC as propane") for purposes of compliance. If methane is measured concurrently with THC, then "THC as propane, minus methane" can be considered to be VOC ("VOC as propane") for purposes of compliance.
- f. Monitor Type and Span: The span values for the NO_x, SO₂, and VOC (or THC) CEM systems shall be no less than 150 percent and no greater than 300 percent of the maximum permitted emissions of the inline kiln/raw mill. For purposes of setting CEM system span values, the mass emission rate (pounds per hour) for SO₂, NO_x, and VOC (or THC) shall be converted to an approximate stack gas concentration (ppm) based on the minimum expected stack gas flow rate (cubic feet per minute) and the permitted mass emission rate limit (pounds per hour). All CEM systems shall be capable of automatically switching to a higher span to accurately measure spikes of stack gas concentrations. The span value for the oxygen CEM system shall be 25 percent oxygen.
- g. Calculation Algorithm: Rolling and block averages shall be calculated through the integrated and automated data acquisition and handling system of the CEM system or through some other method as approved by the Department. The calculation algorithm shall be documented and available on-site for inspection and verification.

[Rule 62-4.070(3), F.A.C., and BACT]

[Note: Continuous opacity monitor (COM) systems shall be installed, operated, and maintained at the kiln/raw mill baghouse stack and the outlet of the clinker cooler ESP pursuant to 40 CFR ~~60.63~~ 63.1350. A continuous emission monitor for emissions of total hydrocarbon is required pursuant to 40 CFR 63.1349 and 63.1450. A continuous monitor for the temperature at the inlet to the in-line kiln/raw mill baghouse is required pursuant to 40 CFR 63.1349 and 63.1450.]

SECTION III.C - SPECIFIC CONDITION 4

4. **Emissions Unit 008**: Emissions unit 008 shall have the following emission points:

EMISSION POINT	DESCRIPTION
S-17 East	Coal mill
S-17 West	Coal mill
S-21	Dust collector for coal transfer system.

Particulate matter emissions from all emission points in this emissions unit shall be controlled by baghouses.

Particulate matter (PM) emissions from each emission point of emissions unit 008 shall not exceed 0.01 grains/dscf, and PM₁₀ emissions shall not exceed 0.01 grains/dscf. Particulate matter emissions from each emission point of this emissions unit shall be controlled by a baghouse. Visible emissions from each emission point of this emissions unit shall not exceed 5% opacity.

For emission points S-17 East and S-17 West, after initial testing that demonstrates compliance with the PM limit of this condition is completed, subsequent compliance testing for PM emissions from this emission point is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. For the other emission point of emissions unit 008, initial and annual compliance testing for PM emissions from this emission point is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to

believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version).

[Note: These emission limits effectively limit annual emissions of PM for all emission points in this emission unit to ~~7.9~~ 8.2 tons per year. PM₁₀ emissions are estimated to equal PM emissions, or ~~7.9~~ 8.2 tons per year. The particulate weight emission standard and the visible emissions limit of 5% opacity are BACT.]

[Rules 62-4.070(3), 62-210.700(5), 62-212.400 and 62-297.620(4), F.A.C., BACT and applicant request]

SECTION III.C - SPECIFIC CONDITION 5

5. **Emission Tests Required – Emissions Unit 008:** The owner or operator shall demonstrate compliance with the visible emissions standard for emissions unit 008 annually using EPA Method 9, as described in 40 CFR 60 Appendix A (1997 version). The owner or operator shall demonstrate initial compliance with the particulate matter (PM) limits of this permit for emission points S-17 East and S-17 West of emissions unit 008 using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version). Should subsequent particulate matter (PM) testing be required for either emission point of emissions unit 008, compliance shall be demonstrated using EPA Method 5. Testing for PM₁₀ is not required, because all PM emissions shall be assumed to be PM₁₀.

[Rules 62-4.070(3), 62-297.310 and 62-297.620(4), F.A.C. and BACT]

SECTION III.C - SPECIFIC CONDITION 8

8. **Pursuant to 40 CFR 60.250 Applicability and Designation of Affected Facility:**

- (a) The provisions of this subpart are applicable to any of the following affected facilities in coal preparation plants which process more than 200 tons per day: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), and coal storage systems.

[40 CFR 60.250]

[Note: The coal mill, emission points S-17 East and S-17 West of emissions unit 008, is subject to the requirements for thermal dryers. Emissions unit 009 is subject to the requirements for coal processing and conveying equipment. Both emission points of emissions unit 008 are also subject to the emission limits for coal processing and conveying equipment, but the BACT limits are as stringent or more stringent than the limits imposed by this rule.]

These terms are defined at 40 CFR 60.251. The definitions are applicable to this project but have been omitted for brevity. See the Code of Federal Regulations for the text of this section.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than

those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3) of the Florida Statutes, however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the

petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

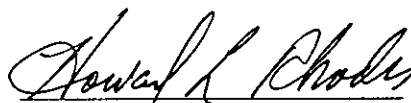
The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106 of the Florida Administrative Code, and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301 of the Florida Administrative Code. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 5/15/03 to the person(s) listed:

Celso Martini, SAC*
Claude Grinfeder, SAC*
Chuck Kessler, SAC
Larry Sellers, Esq.*
Frank Darabi, P.E.
Steve Cullen, P.E.
John Koogler, P.E.
Chris Kirts, DEP NED
Jim Little, EPA
John Bunyak, NPS

Jim Stevenson, DEP
Tom Workman, DEP
Mark Latch, DEP
December McSherry
Svenn Lindskold
Tom Greenhalgh*
Dave Bruderly
Chris Bird, Alachua Co. DER
Chair, Alachua Co. BCC*
J. Calvin Gaddy

Patrice Boyes, Esq.*
Kathy Cantwell
Ralph Ashodian
Virginia Seacrist
Bob and Lynn Milner
Linda Pollini
Helen Beaty
Bessie Robinson
Craig Pittman, St. Pete Times

Clerk Stamp

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52,
Florida Statutes, with the designated
Department Clerk, receipt of which is hereby
acknowledged.

Victoria Gibson May 15, 2003
(Clerk) (Date)

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Celso A. Martini
Plant Manager
Suwannee American Cement
Post Office Box 410
Branford, FL 32008

7001 0320 0001 3692 5962

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Susan Vaughn 5-19-03

C. Signature Agent Addressee

X Susan Vaughn Addressee

D. Is delivery address different from item 1? Yes No

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Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$

Sent to
Celso A. Martini
Street, Apt. No.
or PO Box 410
City, State, ZIP+4
Branford, FL 32008

PS Form 3800, January 2001. See Reverse for Instructions.

2965 2696 7000 0260 7007

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Claude Grinfeder
Suwannee American Cement
Post Office Box 410
Branford, FL 32008

7001 0320 0001 3692 5948

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Susan Vaughn 5-19-03

C. Signature Agent Addressee

X Susan Vaughn Addressee

D. Is delivery address different from item 1? Yes No

If YES, enter delivery address below:

3. Service Type

Certified Mail Express Mail

Registered Return Receipt for Merchandise

Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only, No Insurance Coverage Provided)

Postage \$
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$

Sent to
Claude Grinfeder
Street, Apt. No.
or PO Box 410
City, State, ZIP+4
Branford, FL 32008

PS Form 3800, January 2001. See Reverse for Instructions.

8465 2696 7000 0260 7007

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Lawrence E. Sellers, Jr.
Esquire
Holland & Knight, LLP
Post Office Drawer 810
Tallahassee, FL 32301

7001 0320 0001 3692 5955

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Eric Kent 5/19/03

C. Signature Agent Addressee

X E. Kent Addressee

D. Is delivery address different from item 1? Yes No

If YES, enter delivery address below:

3. Service Type

Certified Mail Express Mail

Registered Return Receipt for Merchandise

Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only, No Insurance Coverage Provided)

Postage \$
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees \$

Sent to
Lawrence E. Sellers, Jr.
Street, Apt. No.
or PO Drawer 810
City, State, ZIP+4
Tallahassee, FL 32301

PS Form 3800, January 2001. See Reverse for Instructions.

5565 2696 7000 0260 7007

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tom Greenhalgh
1211 Paul Russell Road
Tallahassee, FL 32301-7102

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) JULY 24 6 22 PM 2001 B. Date of Delivery 5-31-03

C. Signature [Signature] Agent Addressee

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 5931

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Sent To
Tom Greenhalgh
Street, Apt. No.
1211 Paul Russell Rd.
City, State, Zip+4
Tallahassee, FL 32301-7102

7001 0220 0000 2696 6665

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Rodney J. Long, Chair
Alachua County Board of
County Commissioners
Post Office Box 2877
Gainesville, FL 32602-2877

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) J. Crow B. Date of Delivery 12-15-03

C. Signature [Signature] Agent Addressee

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 5917

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Sent To
Rodney J. Long
Street, Apt. No.
Post Office Box 2877
City, State, Zip+4
Gainesville, FL 32602-2877

7001 0220 0000 2696 6665

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Patrice Boyes, Esquire
Boyes and Associates, PA
Post Office Box 1424
Gainesville, FL 32602

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) NADIA LEE B. Date of Delivery 5-10-03

C. Signature [Signature] Agent Addressee

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 5924

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Sent To
Patrice Boyes
Street, Apt. No.
Post Office Box 1424
City, State, Zip+4
Gainesville, FL 32602

7001 0220 0000 2696 6665