



*Act - pls work with Chris and
decide if a response is
needed.
Howard
2/17/03*

Suwannee American Cement Co., Inc.

P.O. Box 410
Branford, FL 32008-0410
(904) 935-0966 • Fax (904) 935-1155

RECEIVED

FEB 17 2003

DIVISION OF AIR
RESOURCES MANAGEMENT

February 10, 2003

Mr. Howard L. Rhodes, Director
Division of Air Resource Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Rhodes:

We are in receipt of your letter dated January 16, 2003, which grants the requested construction permit extension for the Suwannee American Cement (SAC) facility. Our request only addressed an extension of the permit expiration date and we realize that all other permit requirements remain the same and we will fully comply with these requirements.

Experience of Plant Manager:

As to the experience of the plant managers, attached is the resume of Celso A. Martini. Mr. Martini ha approximately 22 years of cement industry experience with 12 years as a plant manager.

Construction Schedule:

Construction at the facility is virtually complete. However, SAC is continuing to evaluate the merits of a tire burning system that may be added in the future. The remaining commissioning and process startup is detailed in the attached Startup Schedule.

Sale or Legal Transfer:

Votartim Cementos has acquired a fifty (50) percent ownership and management rights of Suwannee American Cement. There will be a change in the corporate status and the corporate officers; however, the corporate name will remain the same. It is uncertain at this time as to whether or not this constitutes a sale or legal transfer. Please notify SAC as to our requirements for notification under the above circumstances.

Continuous Monitoring Data Retrieval System:

The continuous emission monitoring and data retrieval system (CEMS & COMS) has been installed and the system is operational. However, we have yet to electronically verify the data inputs for the baghouse inlet temperature monitor, coal mill exit temperature monitor, kiln feed TPH and clinker production TPH. These inputs will be made operational as the kiln process commissioning is complete and the process is brought on-line. SAC has made arrangements with Bell South to install a dial up line in the Department's Northeast District Office and the computer for data retrieval has been transferred to the District Office. It must be realized at this point the CEM system has not been certified therefore the data will not be valid. Furthermore, there will be many a-typical conditions encountered during process commissioning and star up that may result in erroneous emissions and process inputs, relative to normal operating conditions.

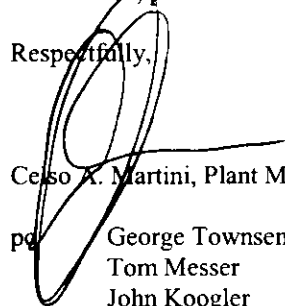
SAC is in the process of selecting a vendor to complete the software and hardware requirements for posting emission data on the Internet.

SAC is well aware of the permit requirements noted in your letter and the body of the permit and will endeavor to comply with all permit requirements on a timely basis. Furthermore, in an additional effort to

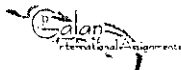
insure that compliance-monitoring requirements are achieved, SAC has committed to install continuous opacity monitoring systems (COMS) on the Finish Mill (N12) and Sepol (N09) baghouses in lieu of the requirements of Section III Emissions Units Specific Conditions, 41(3)(e) which requires a daily Method 22 to be conducted on these sources. The opacity monitors have been purchased and SAC has contacted the equipment vendor to provide the associated equipment and software configurations to integrate the addition opacity monitors into the existing CEM system.

Should you have any question and/or comments concerning this notification or you require additional information, please contact me or George Townsend at (386) 935-5014).

Respectfully,


Celso A. Martini, Plant Manager

pp
George Townsend
Tom Messer
John Koogler
Christopher Kirts, DEP



RÉSUMÉ

1 – PERSONAL INFORMATION

Please fill in without any abbreviation

Name: CELSO ANTONIO MARTINI

(full name, as stated in the passport)

Date of birth: 19 / 02 / 57 Nationality: BRAZILIAN
Day Month Year

Place of birth: LAGOA VERMELHA RIO GRANDE DO SUL BRAZIL
City State Country

Present residence: RUA MOREIRA CÉSAR, Nº 39, APTO 42, SOROCABA, CEP
18010-010, SÃO PAULO, BRAZIL.

(nº street, apt, city, state, zip code, country)

Phone nº: 15 231-9315 Fax nº: _____ E-mail: mcelsom@directnet.com.br

Marital Status: Married Profession: Engineer

Nº of passport: C G 622128 Expires: 06 / 06 / 2005
Day Month Year

2 – PARENTAGE

Father's name: ANTONIO MARTINI
(complete name – do not abbreviate)

Nationality: BRASILEIRO

Mother's name: CAROLINA FÁBRIS MARTINI
(complete name – do not abbreviate)

Nationality: BRASILEIRA



3 – EDUCATION

3.2 – UNIVERSITY

3.2.1

School's full name: Universidade Federal do Parana

City: Curitiba.

Country: Parana

Period: from 1976 to 1982

Course taken: Chemistry Engineering

3.3 – POSTGRADUATE COURSES

3.3.1

School's full name: Escola de Administracao de Empresas de São

City: São Paulo

Country : São Paulo.

Period: from 1999 to 2000

Course taken: MBA – Gestao Empresarial

4 – PROFESSIONAL ACTIVITIES

Please inform **ALL** professional experience, since your graduation, or even before if it is relevant to your functions in Brazil. If you need more pages, please make copy of the last sheet.

4.1

Company: Cia de Cimento Portland Itau
(complete name)

Adress: Bairro Tacanica, s/n, Itaperussu, Parana
(n° street, apt, city, state, zip code, country)

I) Period: from; 09/1980 to 10/1981 Function: Trainee.

Detail the attributions and responsibilities of this function:

Learning the quality standards of products. Learning and accompanying the cement processes of production and understanding the phases of extraction and benefaction of raw materials, grinding and behavior of raw meal, kilns and clinquerization sytems, cements mills and grinding system.

Learning about other input components, semi-finished and finished products.

II) Period: from ; 10/1981 to 04/1982 Function: Chief of Chemistry Engineering

Detail the attributions and responsibilities of this function:

Responsible for the plans optimization process:Crushing, Grinding, Burning, and Quality. Evaluating and implementing new technologies, dimensioning and rationalizing resources and processes, seeking new applicative alternatives, always maintaining the quality standard of products.

Realization off the thermal and mass balances for the optimization of this process.

III) Period: from: 04/1982 to 02/1985 Function: Production Coordinator

Detail the attributions and responsibilities of this function:

Responsible for all objectives of cement production are met for one industrial plant, through planning, administration and control of Fabrication, Quality Control, Hygiene / Medicine and Environmental and Work Safety processes, with the objective of complying with the sales forecasts

Responsible for the cost minimization, evaluating and implementing new technologies, dimensioning and rationalizing resources and processes, seeking new applicative alternatives, always maintaining and improvement the quality standard of products



4.2

Company: S.A Industrias Votorantim, Fabrica de Cimento Rio Negro
(complete name)

Address: Av. Senador Jose Ermirio de Moraes, Cantagalo, CEP 10010-010, RJ, Brasil

(n° street, apt, city, state, zip code, country)

I) Period: from 03/1995 to 08/1986 Function: Control Quality Coordinator

Detail the attributions and responsibilities of this function:

Responsible for the extraction and benefaction of raw materials necessary to cement production are made, accompanying and controlling works according to planning of mine work and pre-established specifications, as well as the prospection, and making available the mineral resources.

Responsible for the quality standard of products, accompanying the processes of analyses and understanding the phases of extraction of raw materials and other input components, semi-finished and finished products, assuring that all clients received products with assurance quality.

II) Period: from 11/1986 to 01/1997 Function: Process Engineer

Detail the attributions and responsibilities of this function:

Responsible for the quality standard of products, in the 7 industrials units.

Responsible for the quality standard of products, accompanying the processes of analyses and understanding the phases of extraction of raw materials and other input components, semi-finished and finished products.

Responsible for the definition and establishment of quality goals and politics for the 7 Industrials Units, as well as giving technical support and suggestions for the definition of the standards Company's guidelines.

III) Period: from 05/1990 to 01/1994 Function: Plant Manager - Fabrica Moagem Volta Redonda.



IV) Period: from 01/1994 to 10/2001 Function: Plant Manager - Fabrica de Cimento Santa Helena e Salto de Pirapora.

V) Period: from 10/2001 to 09/2002 Function: Plant Manager Fabrica de Cimento Portland Itau

Detail the attributions and responsibilities of this functions:

Assuring that the objectives of cement production are met for one industrial plant, through planning, administration and control of Mining, Fabrication, Quality Control, Maintenance, Financing Administration, Hygiene / Medicine and Environmental and Work Safety processes, with the objective of complying with the sales forecasts.

Assuring that the extraction and benefaction of raw materials necessary to cement production are made, accompanying and controlling works according to planning of mine work and pre-established specifications, as well as the prospection, and making available the mineral resources.

Administrating the plans for cost minimization, evaluating and implementing new technologies, dimensioning and rationalizing resources and processes, seeking new applicative alternatives, always maintaining the quality standard of products.

Responding for the quality standard of products, accompanying the processes of analyses and understanding the phases of extraction of raw materials and other input components, semi-finished and finished products.

Responsible for the definition and establishment of industrial goals and politics for the Unit, as well as giving technical support and suggestions for the definition of the Company's guidelines.

Responding for the conservation and improvement of equipment and other installations for the technological maintenance of the industrial plant, evaluating studies of technical and economical feasibility's, new projects, investments, etc, as well as for programs of mechanical, electrical and instrumental maintenance, aiming at the perfection and efficiency of production processes.

Assuring that the administrative activities are performed, accompanying their compliance with the pertinent norms and technical / legal procedures.

Administrating the Unit's projects of know-how amelioration, directing updating programs according to the technologies to be implemented, as well as scattering technical knowledge.

Keeping contact with and representing the Company before entity and governmental classes, etc, with the objective of maintaining the institutional image together with the external community.



Responding for complying with the standards related to occupational hygiene and medicine, work safety and environment, through implementation and control of adequate procedures as per the need of each locality, in compliance with pertinent legislation.

Providing administrative information about the Unit's activities, clearing technical questions for future decisions to be made by the superiors

Responsible for the improvement the all Excellence Operational Systems Management: Quality System, based on ISO 9000 standards; Maintenance System; Total Productive Maintenance (TPM); Safety, Health and Environmental System (NOSA); Routine Management; Six Sigma Projects; Cost and Budget System.
Assuring resources, knowledge and development for all the people.

After the approval of the work permit, the visa will be sent to the Brazilian Consulate in the jurisdiction of your residence, where you have been living for the latest 12 months, OR in the country of your nationality. Please inform below which Brazilian Consulate the visa should be sent to:

City: _____ Country: _____



SUWANNEE AMERICAN CEMENT START UP SCHEDULE

Area	Green tag	Inspection and Clean up	Comissioning	Start up Schedule
Water Treatment System	10/3/2002	11/10/2002	11/12/2002	11/12/2002
Limestone/Clay Storage	11/29/2002	12/3/2002	12/5/2002	12/18/2002
Control Panel (Polcid)	10/31/2002	10/31/2002	11/30/2002	11/30/2002
CNA	10/31/2002	12/20/2002	1/25/2003	1/30/2003
Raw Mill	11/7/2002	11/18/2002	12/7/2002	1/26/2003
Blend Silo	11/18/2002	11/18/2002	11/25/2002	12/30/2002
Preheater Tower	11/29/2002	12/10/2002	12/10/2002	1/27/2003
Kiln	12/16/2002	12/30/2002	1/14/2003	2/8/2003 2/10/2003
Conditioning Tower	11/29/2002	12/10/2002	12/20/2002	1/24/2003
Coal Mill	11/29/2002	12/5/2002	12/16/2002	2/6/2003
Cooler/ESP	12/6/2002	12/16/2002	12/30/2002	2/10/2003
Coal Feeding System(Pfister)	11/29/2002	12/16/2002	12/20/2002	2/10/2003
Clinker Conveying/Storage	12/6/2002	12/16/2002	12/20/2002	2/10/2003
Finish Mill	11/29/2002	1/6/2003	1/25/2003	2/17/2003
Cement Silo/Loading System	12/6/2002	1/10/2003	1/25/2003	2/18/2003

CEM Certification & Compliance Testing Schedule

This is a tentative schedule and may vary based actual process startup and sampling times

Day	Date	Activity																																										
1 thru 8	Tuesday 01-Apr-03 thru Monday 08-Apr-03	Initial visit/survey sampling locations Initiate seven (7) day drift test of the CEM system																																										
9 thru 13	Tuesday 14-Apr-03 thru Friday 18-Apr-03	Certification of kiln/raw mill stack CEM (SO ₂ , NO, NO ₂ , O ₂ , flow), process O ₂ & CO, and opacity monitor Certification of the clinker cooler stack opacity monitor and the coal mill outlet temperature monitor.																																										
14 thru 27	Monday 23-Apr-03 thru Friday 09-May-03	Mass emission testing at the kiln/raw mill stack - PM/PM ₁₀ , SO ₂ , CO, VOC, Dioxin (2) and mercury (informational) HCL emission test at the kiln/raw mill stack, informational/MACT major - minor determination Visible emission observation on the kiln stack Coal Mill PM & PM ₁₀ Finish Mill 1 & 2 PM/PM ₁₀																																										
28 thru 35	Monday 14-May-03 thru Friday 23-May-03	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Visible Emission observations:</td> <td style="width: 40%;">Fugitive Points.</td> </tr> <tr> <td>Finish Mill, Sepol No.1 (W), **</td> <td>N09-01</td> </tr> <tr> <td>Finish Mill, Mill No.2 (E)</td> <td>N12-01</td> </tr> <tr> <td>Finish Mill Baghouse No. 3 (S)</td> <td>N91-01</td> </tr> <tr> <td>Fringe Cement Bin</td> <td>N36-01</td> </tr> <tr> <td>Aeropol @ Homogenizing Silo</td> <td>E28-01</td> </tr> <tr> <td>Off Spec. Feed Handling</td> <td>E34-01</td> </tr> <tr> <td>Homogenizing Silo Inlet</td> <td>G07-01</td> </tr> <tr> <td>Poldos Blend Silo Outlet</td> <td>H08-01</td> </tr> <tr> <td>Coal Mill No. 1, East</td> <td>S17-01</td> </tr> <tr> <td>Coal Mill No. 2, West</td> <td>S17-01</td> </tr> <tr> <td>Coal Mill No. 3, South</td> <td>S21-01</td> </tr> <tr> <td>Clinker Cooler Conv./Breaker</td> <td>L03-01</td> </tr> <tr> <td>Clinker Silo, Inlet</td> <td>L06-01</td> </tr> <tr> <td>Gyp/OS Clinker Transport</td> <td>L25-01</td> </tr> <tr> <td>Clinker Conveyor (South)</td> <td>M08-01</td> </tr> <tr> <td>Clinker Conveyor (North)</td> <td>M09-01</td> </tr> <tr> <td>Cement Transport Conveyor</td> <td>P03-01</td> </tr> <tr> <td>Cement Silo Input</td> <td>P11-01</td> </tr> <tr> <td>Truck Load-out No. 1 (E)</td> <td>Q14-01</td> </tr> <tr> <td>Truck Load-out No. 2 (W)</td> <td>Q17-01</td> </tr> </table>	Visible Emission observations:	Fugitive Points.	Finish Mill, Sepol No.1 (W), **	N09-01	Finish Mill, Mill No.2 (E)	N12-01	Finish Mill Baghouse No. 3 (S)	N91-01	Fringe Cement Bin	N36-01	Aeropol @ Homogenizing Silo	E28-01	Off Spec. Feed Handling	E34-01	Homogenizing Silo Inlet	G07-01	Poldos Blend Silo Outlet	H08-01	Coal Mill No. 1, East	S17-01	Coal Mill No. 2, West	S17-01	Coal Mill No. 3, South	S21-01	Clinker Cooler Conv./Breaker	L03-01	Clinker Silo, Inlet	L06-01	Gyp/OS Clinker Transport	L25-01	Clinker Conveyor (South)	M08-01	Clinker Conveyor (North)	M09-01	Cement Transport Conveyor	P03-01	Cement Silo Input	P11-01	Truck Load-out No. 1 (E)	Q14-01	Truck Load-out No. 2 (W)	Q17-01
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Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

February 4, 2003

HAND DELIVERY / FEDEX
VIA CERTIFIED-RETURN RECEIPT MAIL AND FACSIMILE

Mr. George Townsend
Suwannee American Cement Company, Inc.
PO Box 410
Branford, Florida 32008

RECEIVED

FEB 10 2003

Dear Mr. Townsend:

BUREAU OF AIR REGULATION

Permit Number 1210465-001-AC, PSD-FL-259
Suwannee American Cement Company, Inc.
Suwannee County - Air Compliance

This is in response to your letter of this date concerning startup of Suwannee American Cement Company's Kiln system on February 10.

Please be advised that the subject permit requires:

"... all of the CEMS are installed, recording, and continuously transmitting available data to the Department's Northeast District Office."

This requirement has not been met to date. Startup without meeting this requirement will constitute a permit violation.

If you have any question concerning this request, please contact me at the above address or telephone (904) 807-3235.

Sincerely,

Christopher L. Kirts.
Air Program Administrator

Cc: Howard Rhodes
Alvaro Linero
Cameron Cooper

"More Protection, Less Process"

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