



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

December 16, 2003

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

Celso Martini, Plant Manager
Suwannee American Cement
PO Box 410
Branford, Florida 32008

RE: DEP File No. 1210645-006-AV
Cement Plant- Branford, Suwannee County, Florida

Dear Mr. Martini:

This letter is in response to Suwannee American Cement, LLC's ("SAC") September 9, 2003 correspondence to Mr. Chris Kirts in the Department's Northeast District Office. SAC requested that the Department clarify the mercury sampling procedures in SAC's Title V air operation permit.

In order to make such a clarification, the Department must have a request to modify the underlying construction permit (PSD-FL-259B). In the event SAC would still like to pursue this clarification, please resubmit a request to modify the construction permit to my attention. If you have any questions, please contact Al Linero at 850/921-9523.

Sincerely,

A handwritten signature in black ink that reads "Trina L. Vielhauer".

Trina L. Vielhauer, Chief
Bureau of Air Regulation

cc: Chris Kirts, NED



Suwannee American Cement, LLC

5117 US Hwy. 27
P.O. Box 410
Branford, FL 32008-0410
(386) 935-5000 • Fax (386) 935-5080

RECEIVED

SEP 10 2003

BUREAU OF AIR REGULATION

September 9, 2003

Chris Kirts, P.E.
Northeast District -- Air Program
Department of Environmental Protection
7825 Baymeadows Way, Suite B-200
Jacksonville, FL 32256-7590

SUBJECT: Suwannee American Cement
Application for Title V Air Operation Permit
Branford Plant
Facility ID No. 1210465
Request for Clarification to Compliance Method

Dear Mr. Kirts:

This letter requests that the Department clarify the compliance method for mercury sampling for inputs into the kiln system. There appears to be an inconsistency with sampling procedures for mercury inputs to the kiln system in two conditions in the Permit No. 1210465-001-AC.

The applicable requirement limiting mercury is Specific Condition 13 of Permit No. 1210465-001-AC, which states:

*13. Mercury into the Pyroprocessing System Limited: The total mass of mercury compounds introduced into the pyroprocessing system, expressed as Hg, in **raw mill feed** and fuels shall not exceed 97 pounds per consecutive 12-month period. [emphasis added]*

The compliance method for the mercury limitation is found in Specific Condition 27 of Permit No. 1210465-001-AC, which states in pertinent part:

*27. Material Balance Records of Mercury: ... The owner or operator shall, for each month of sampling required by this condition, perform daily sampling of the **preheater feed material from the blend silo**, coal, petroleum coke, tires and tire-derived fuel, and shall composite the daily samples each month, and shall analyze the monthly composite sample to determine mercury content of these materials for the month... [emphasis added]*

Additionally Suwannee American Cement wishes to clarify this sampling location because it has become aware that feed material is exposed to mercury cycling in the raw mill. This exposure can result in higher measured mercury concentrations in preheater feed material than concentrations measured in raw mill feed.

As the requirement limits mercury in raw mill feed, it is requested that "raw mill feed" be substituted for "preheater feed material from the blend silo" in the Title V air operation permit.

If you have any questions, please feel free to contact me at (386) 935-5039.

Sincerely,

A handwritten signature in black ink, appearing to read "J bth". The signature is written in a cursive style with a large initial "J" and the initials "bth" following.

Joe Horton
Environmental Manager
Suwannee American Cement

CC: Al Linero – DEP New Source Review Section
Celso Martini – Suwannee American Cement
Koogler and Associates

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1. Article Addressed to:

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

2. Article Number (Copy from service label)
 70002870 0000 7028 3611

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

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C. Signature *A. Wiggins* Agent Addressee

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

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