



KOUGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

624-00-01
December 13, 2002

RECEIVED

DEC 16 2002

BUREAU OF AIR REGULATION

Mr. Al Linero
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Subject: *Suwannee American Cement Company, Inc.*
Permit No. 1210465-001-AC/PSD-FL-259
Air Construction Permit Extension

Dear Mr. Linero:

The above-captioned air construction permit issued to the Suwannee American Cement Company, Inc. (SAC) on June 1, 2000, has an expiration date of May 30, 2003. By this letter, we are requesting that the expiration date of the permit be extended until May 30, 2006. This request is made pursuant Condition No. 6 of Section II, *Facility-wide Specific Conditions* of the above-captioned permit and Rules 62-4.070, 62-4.080, 62-4.210 and 62-210.300(1), F.A.C.

The attached construction schedule (dated November 24, 2002) shows that the anticipated startup of the kiln is now projected to be in early 2003. The permit extension through May 30, 2006 will allow, with a reasonable margin of safety, for the startup and debugging all elements of the plant, performance tests to demonstrate that the plant can operate at permitted capacity, emission testing to demonstrate compliance with all emission limiting standards of the above-captioned permit, the preparation and submission of a complete Title V Air Operating Permit to the FDEP Northeast District Office, and the time necessary for SAC to evaluate and install a tire burning system. The requested extension will avoid the possibility of missed deadlines and the urgent and perhaps untimely scheduling of activities and/or testing to comply with a more restrictive permit expiration date.

The plant is being constructed as described in documents submitted to the Department in support of the Air Construction Permit and as described in the Department's *Best Available Control Technology Determination*. Particulate matter (PM and PM10) emissions from the kiln/raw mill and from all other applicable material process, handling and/or transfer points except the clinker cooler, will be controlled by fabric filters (baghouses) which were determined to be *Best Available Control Technology* (BACT). The PM/PM10 emissions from the clinker cooler will be controlled by electrostatic precipitator which was determined to be BACT for this emission unit. The sulfur dioxide emissions from the kiln/raw mill will be controlled by process absorption inherent to dry process Portland cement plants operating in Florida. The nitrogen

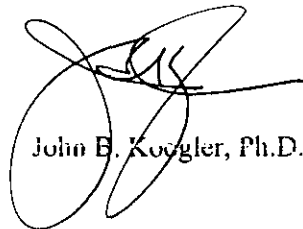
oxides (NO_x) and carbon monoxide (CO) will be controlled by process design and work practice standards. The process design includes multi-stage combustion with a separate line combustion chamber incorporated specifically to minimize NO_x emissions. This design was determined to be BACT and it is the most advanced process designed employed for NO_x and CO control in the State of Florida. Based on the plant design, the emission control measures that will be employed as BACT, the experience of the plant staff, the inherent characteristics of the raw materials that will be used at the plant, and the demonstrated compliance of similarly designed and operating plants in Florida, there is reasonable assurance that the plant will not discharge, emit or cause pollution in contravention of Department standards or rules.

This request for a permit extension complies with all Department requirements and rules. The request was made in a timely manner and the requested time extension is reasonable considering the current construction schedule (attached), the tasks which must be completed in order to have a complete Title V Permit Application in the hands of the Department's Northeast District Office prior to the expiration of the construction permit and the evaluation of the tire derived fuel system. Furthermore, there is all reasonable assurance that the plant, once operating, will comply all permit requirements based on the installation and employment of pollution control measures established as BACT and on the demonstrated compliance of similar new dry process precalciner Portland cement plants operating in Florida.

If there should be additional information required or if there are questions regarding the information provided, please do not hesitate to contact me. Thank you in advance for your consideration of this request.

Very truly yours,

KOGLER & ASSOCIATES



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

JBK/jhm
Attachment

cc: Chris Kirts, FDEP, Jacksonville
Celso Martini, SAC
George Townsend, SAC

Activity ID	Activity Description	Early Start	Early Finish	2002												2003							
				APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	A			
+ LIMESTONE STORAGE STRUCTURE		25JAN02A	18DEC02	[Gantt bar from Jan 25 to Dec 18]																			
+ SAND TRUCK UNLOADING		20SEP02A	13DEC02																				
+ RW MTL FD BINS, CONVEYORS		25FEB02A	18DEC02	[Gantt bar from Feb 25 to Dec 18]																			
+ ROLLER MILL		15APR02A	13DEC02	[Gantt bar from Apr 15 to Dec 13]																			
+ NEUTRON ANALYZER		16SEP02A	20DEC02																				
+ BLENDING SILO		22OCT02A	13DEC02																				
+ PREHEATER AND KILN FEED SYSTEM		11DEC02	18DEC02																				
+ ROTARY KILN		03DEC02	17DEC02																				
+ KILN/MILL REVERSE AIR BAGHOUSE		15APR02A	13DEC02	[Gantt bar from Apr 15 to Dec 13]																			
+ COAL MILL		24JUN02A	23DEC02																				
+ CLINKER COOLER		07JAN02A	17DEC02	[Gantt bar from Jan 7 to Dec 17]																			
+ COAL & IRON ORE UNLOADING		13MAY02A	18DEC02																				
+ #20 CLINKER COOLER ELECTROSTATIC PRECIPITATOR		14OCT02A	17DEC02																				
+ #26 GYPSUM STORAGE BUILDING		04DEC02	17DEC02																				

Start Date 18DEC00
 Finish Date 30JAN03
 Data Date 24NOV02
 Run Date 11DEC02 16:05

Early Bar
 Progress Bar
 Critical Activity

1208 Sheet 1 of 2

SUWANNEE AMERICAN CEMENT
 WATKINS ENGINEERS & CONSTRUCTORS
 GROUP READINESS SUMMARY

Date	Revision	Checked	Approved

Activity ID	Activity Description	Early Start	Early Finish	2002												2003				
				APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	A
+ CLINKER STORAGE SILOS		14MAY02A	20DEC02	[Gantt Bar: May 14 - Dec 20]																
+ CLINKER TRANSPORT FROM STORAGE		29JUL02A	20DEC02	[Gantt Bar: Jul 29 - Dec 20]																
+ FINISH MILL		03DEC01A	23DEC02	[Gantt Bar: Dec 3 - Dec 23]																
+ CEMENT STORAGE SILOS & TRUCK LOADING W/SCALE		14MAR02A	23DEC02	[Gantt Bar: Mar 14 - Dec 23]																
+ LEACHFIELD & SANITARY SYSTEM		16SEP02A	13DEC02	[Gantt Bar: Sep 16 - Dec 13]																
SITWORK BY SAC																				
PLANT SERVICES																				
02C11	SITWORK INCL FINAL GRADING, PONDS, CONST ROADS	16MAR01A	30JAN03	[Gantt Bar: Mar 16 - Jan 30]												[Progress Bar]				
+ OFFICE AND CONTROL ROOM BUILDING		22JUL02A	13DEC02	[Gantt Bar: Jul 22 - Dec 13]																
GENERAL																				
GENERAL MILESTONES																				
02C15	INSTALL FIRE PROTECTION LOOP	20JUL01A	20DEC02	[Gantt Bar: Jul 20 - Dec 20]												[Progress Bar]				
02C85	SITWIDE TOUCHUP PAINTING	23DEC02	15JAN03													[Progress Bar]				
02C125	PUNCHLIST/CHANGE REQUESTS	16JAN03	30JAN03													[Progress Bar]				
17C01	WEC MECHANICAL COMPLETION		30JAN03													[Progress Bar]				
+ PLANT SERVICES		27MAY02A	13DEC02	[Gantt Bar: May 27 - Dec 13]												[Progress Bar]				

Start Date 18DEC00
 Finish Date 30JAN03
 Data Date 24NOV02
 Run Date 11DEC02 16 05

Early Bar
 Progress Bar
 Critical Activity

1208
 Sheet 2 of 2
**SUWANNEE AMERICAN CEMENT
 WATKINS ENGINEERS & CONSTRUCTORS
 GROUP READINESS SUMMARY**

Date	Revision	Checked	Approved