

FINAL DETERMINATION

Suwannee American Cement Plant

Extension of Permit and Hydrated Lime Injection

DEP File No. 1210465-008-AC (PSD-FL-259D)

On September 24, 2004 the Florida Department of Environmental Protection (Department) distributed an "Intent to Issue Air Construction Permit Modification" to construct a hydrated lime injection system and to extend the expiration date of the permit to construct the Suwannee American Cement Plant located on U.S. Highway 27, in Suwannee County. The Draft Permit Modification also proposed a compliance averaging time for volatile organic compounds of 30 operating (instead of calendar) days and clarified two inconsistent conditions related to mercury sampling.

The package included the Department's Draft Air Construction Permit Modification, the "Intent to Issue Air Construction Permit Modification," the "Technical Evaluation and Preliminary Determination," and the "Public Notice of Intent to Issue Air Construction Permit Modification." The Department sent copies of the package to various persons, agencies, and municipalities including those who had asked that they be informed of any Department permitting activities related to the subject facility. Suwannee American Cement, LLC published the Public Notice in The Suwannee Democrat on October 1, 2004 and provided to the Department the required proof of publication.

The Department received no comments on the Draft Air Construction Permit. At the request of the Department, Suwannee American Cement supplied an emission point number (unspecified in the draft) for the required baghouse that will control dust from the hydrated lime injection system. The emission Point is designated as H-08A-01, "Dust Collector for hydrated lime silo E-30-01". Section III, Subsection B, Condition 14 will read as follows:

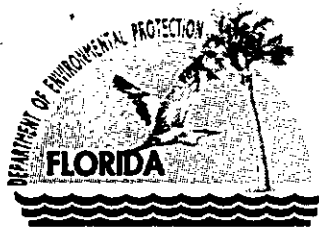
14. Emissions Unit 002: Emissions unit 002 shall have the following emission points:

EMISSION POINT	DESCRIPTION
E-28	Dust collector – Aeropul at the homogenizing silo
E-34	Dust collector for off-spec feed handling
G-07	Dust collector for homogenizing silo inlet
H-08	Dust collector for homogenizing silo outlet
<u>H-08A-01</u>	<u>Dust collector for hydrated lime silo E-30-01</u>

This permit authorizes permanent installation of the following equipment for the injection of hydrated lime: lime silo, baghouse, control system and associated ductwork. Hydrated lime may be injected near the top of the preheater as an option to control SO₂ emissions.

The remainder of Condition 14 is unchanged.

The final action is to issue the Air Construction Permit Modification as drafted but with the specified emission point number.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

October 18, 2004

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. 1210465-008-AC (PSD-FL-259D)
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

The Florida Department of Environmental Protection (“the Department”) reviewed your application dated April 26, 2004 requesting a further extension of the original air construction permit from June 30, 2004 through June 30, 2006. Consistent with our conversations and your written correspondence, tires and fly ash will be combined with other applications under review by the Department.

At this time the plant has already been constructed and Suwannee American Cement (SAC) has shown that it can operate at the authorized production rate and emission limits. The request to extend the construction permit through 2006 was based upon timing for the fly ash and tire project which have been deferred and consolidated with other requests. We believe that an extension through July 31, 2005 is sufficient to construct the hydrated lime system and complete the Title V Operation Permit application.

The Department also eliminated prior inconsistencies within the permit for mercury (Hg) sampling to clarify that Hg in the raw materials will be determined prior to introduction into the raw mill instead of the preheater. Lastly, the Department considered use of the same reporting bases for the volatile organic compounds (VOC) BACT limit as EPA’s total hydrocarbons (THC) MACT limit.

This facility was originally authorized and constructed pursuant to Permit No. PSD-FL-259 issued on June 1, 2000. This permit action supplements Permit No. PSD-FL-259 and the changes dated November 8, 2002, January 18, 2003, and May 15, 2003 to that permit. Unless otherwise specified, this permit action does not alter any requirements of that permit. Permit No. PSD-FL-259 is hereby supplemented and modified as follows.

“More Protection, Less Process”

Printed on recycled paper.

PLACARD PAGE 1

The expiration date on this page is changed from June 30, 2004 to July 31, 2005.

FACILITY-WIDE SPECIFIC CONDITIONS

ADMINISTRATIVE

6. Expiration: This air construction permit shall expire on ~~June 30, 2004~~ July 31, 2005. The permittee, for good cause, may request that this construction and PSD permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit.

[Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]

PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

[40 CFR 52.21(r)(2)]

BACT Determination: In conjunction with extension of the 18 month periods to commence or continue construction, or extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [40 CFR 52.21(j)(4)] ~~The Department will not require demonstration of adequacy unless an extension is requested beyond June 30, 2004.~~

{Permitting Note: The basic cement manufacturing plant has been constructed and the plant has met its permitted BACT limits. The purpose of the extension is to allow sufficient time to complete the application for a Title V air operation permit and install permanent equipment for hydrated lime injection. The Department retains the authority to set final SO₂ and NO_x limits pursuant to the Section III, Subsection B, Condition 12 reproduced below.}

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

SUBSECTION B.

STATE REQUIREMENTS

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

12. Emissions Limited and Subject to Revision for SO₂ and NO_x: Emissions from the facility shall not exceed the limitations specified in this permit. Based on results of compliance tests and continuous monitoring data, the Department may revise the emission limits for sulfur dioxide and nitrogen oxides downward to make these limits more stringent provided that overall control attained for all air pollutants including SO₂, NO_x, VOC and CO is optimized. Such revision shall be based on data that represents a full range of operating conditions and a representative period of time. Such revision, if required by the Department, shall be in the form of a federally enforceable permit and shall be publicly noticed by the permittee. [Rules 62-4.070(3) and 62-212.400(7)(a), F.A.C.]

{No change in this condition. Reproduced as cross reference to Facility-Wide Specific Condition 6.}

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

EMISSION POINT	DESCRIPTION
E-28	Dust collector – Aeropol at the homogenizing silo
E-34	Dust collector for off-spec feed handling
G-07	Dust collector for homogenizing silo inlet
H-08	Dust collector for homogenizing silo outlet
H-08A-01	Dust collector for hydrated lime silo E-30-01

This permit authorizes permanent installation of the following equipment for the injection of hydrated lime: lime silo, baghouse, control system and associated ductwork. Hydrated lime may be injected near the top of the preheater as an option to control SO₂ emissions.

The remainder of Condition 14 is unchanged.

15. Emissions Unit 004:

This condition is unchanged with the exception of Note 6 to the associated Table. Note 6 is modified as follows:

⁶ The averaging time for VOC shall be a 30 ~~calendar~~ operating-day block average computed in accordance with specific condition 18 of this subsection.

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

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. 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~~ operating-day block average that shall be computed as the arithmetic average of all valid hourly averages occurring within each 30 ~~calendar~~ operating-day block.
- b., c., and d. are unchanged.
- 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. The VOC (or THC) CEM system shall be installed, operated and maintained in accordance with Performance Specification 8A of Appendix B in 40 CFR 60. The system shall comply with all of the requirements for continuous monitoring systems found in the general provisions of Subpart A in 40 CFR 63. It is not a requirement to calculate hourly rolling averages in accordance with Section 4.9 of Performance Specification 8A. Compliance with the emission limit for VOC (or

THC) shall be computed as the arithmetic average of all valid emissions data collected for a block of 30 operating days. For purposes of the VOC (or THC) limit, an operating day is any day that the kiln produces clinker and/or fires fuel. Emissions data are only used for the determination of a single 30 operating-day block average. Emissions shall be reported in units of the standards (lb/hour, lb/ton clinker, and ppmvd as propane corrected to 7% oxygen). These requirements shall be interpreted to be consistent with the monitoring requirements specified in 40 CFR 63.1350. [Permit Nos. PSD-FL-259 C and D]

The remainder of Condition 18 is unchanged.

27. **Material Balance Records of Mercury:** The owner or operator shall demonstrate compliance with the mercury throughput limitation by material balance and making and maintaining records of monthly and rolling 12-month mercury throughput. The owner or operator shall, for each month of sampling required by this condition, perform daily sampling of the raw mill feed ~~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. The owner or operator shall determine the mass of mercury introduced into the pyroprocessing system (in units of pounds per month) from the total of the product of the mercury content from the monthly composite analysis and the mass of each material or fuel used during the month. The consecutive 12-month record shall be determined from the individual monthly records for the current month and the preceding eleven months and shall be expressed in units of pounds of mercury per consecutive 12-month period. Such records shall be completed no later than 25 days following the month of the records. To determine the mercury content of the feed material and fuels to be used in the monthly calculation, sampling and analysis shall be performed in accordance with the following schedule:
- i. For the first quarter of the operation of the plant, sample for each month of the quarter and analyze each month's composite sample.
 - ii. For the next three quarters, sample for one month of each quarter and analyze that month's composite sample.
 - iii. For each year thereafter, sample for one month of each year and analyze that month's composite sample, except as follows.
 - a. If there is a change in feed material or fuels utilized from those previously sampled and analyzed, the frequency shall revert to ii, above, for the next three quarters.
 - b. If the monthly composite analysis shows a total monthly mercury throughput of greater than 6.2 pounds per month of mercury introduced into the pyroprocessing system, the frequency shall revert to ii, above, for the next three quarters or until the monthly throughput is less than or equal to 6.2 pounds per month, whichever is longer.

[Rule 62-4.070(3), F.A.C.; Permit No. PSD-FL-259D]

{Permitting Note: Permit No. PSD-FL-259D changed a mercury sampling location identified as the "preheater feed material from the blend silo" to the "raw mill feed". This is the correct monitoring point as stated in Final Order OGC Case No. 99-116, DOAH Case No. 99-3096 and the sampling locations are now consistent with those identified in Condition 13.}

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

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



Michael G. Cooke, Director
Division of Air Resource
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 10/20/04 to the person(s) listed:

Celso Martini, SAC*	Jim Stevenson, DEP	Patrice Boyes, Esq.*
Claude Grinfeder, SAC*	Tom Workman, DEP	Kathy Cantwell
Joe Horton, SAC	Mark Latch, DEP	Ralph Ashodian
Larry Sellers, Esq.*	December McSherry	Virginia Seacrist
Frank Darabi, P.E.	Svenn Lindskold	Bob and Lynn Milner
Steve Cullen, P.E.	Tom Greenhalgh*	Linda Pollini
John Koogler, P.E.	Dave Bruderly	Helen Beaty
Chris Kirts, DEP NED	Chris Bird, Alachua Co. DER	Bessie Robinson
Jim Little, EPA	Chair, Alachua Co. BCC*	Craig Pittman, St. Pete Times
John Bunyak, NPS	J. Calvin Gaddy	Chuck Yagel*

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.


(Clerk)

10/20/04
(Date)

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an Application for Permit:

Suwannee American Cement, LLC
Post Office Box 410
Branford, Florida 32008

DEP File No. 1210465-012-AC
Production Capacity and Fly Ash Injection Test
Suwannee American Cement Plant
Suwannee County

Enclosed is the Permit Number 1210465-012-AC to evaluate the feasibility of a clinker production rate increase by conducting a production capacity and fly ash test during 120 operating days over a six-month period of time at the Suwannee American Cement Plant in Suwannee County. This permit is issued pursuant to Chapter 403, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, F.S., by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Legal Office; 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 of Appeal must be filed within 30 (thirty) days from the date this Notice is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.



Trina L. Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this NOTICE OF FINAL PERMIT (including the FINAL permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10/20/04 to the person(s) listed:

Celso Martini, SAC*
Claude Grinfeder, SAC*
Joe Horton, 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

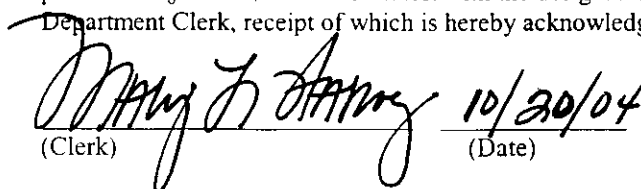
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Tom Workman, DEP
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Svenn Lindskold
Tom Greenhalgh*
Dave Bruderly
Chris Bird, Alachua Co. DER
Chair, Alachua Co. BCC*
J. Calvin Gaddy

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

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.

(Clerk)



Mary J. Anthony

(Date)

FINAL DETERMINATION

Suwannee American Cement Plant

Production Capacity and Fly Ash Test Program

DEP File No. 1210465-012-AC

On September 24, 2004 the Florida Department of Environmental Protection (Department) distributed an "Intent to Issue Air Construction Permit" to conduct a production capacity and fly ash test program at the Suwannee American Cement Plant located on U.S. Highway 27, in Suwannee County.

The package included the Department's Draft Air Construction Permit, the "Intent to Issue Air Construction Permit," the "Technical Evaluation and Preliminary Determination," and the "Public Notice of Intent to Issue Air Construction Permit." The Department sent copies of the package to various persons, agencies, and municipalities including those who had asked that they be informed of any Department permitting activities related to the subject facility. Suwannee American Cement, LLC published the Public Notice in The Suwannee Democrat on October 1, 2004 and provided to the Department the required proof of publication.

The Department received comments only from the applicant. By the letter dated September 29, 2004 Suwannee American Cement, LLC submitted the following comment:

"SAC assumes the intent of the construction permit allows for a construction and use of silos and feed equipment to inject fly ash into the calciner for purposes of the test. This equipment would only be used for purposes of the test and during the approved test period. SAC would seek permanent approval for use of equipment beyond the approved test period from the Department".

The Department agrees that the permit allows for construction and use of silos and feed equipment to inject fly ash into the calciner as well as a baghouse. An Emission Unit designated as "xxx - Temporary Fly Ash Injection" was included in the draft permit. The Department has determined that instead of a separate emission unit, it would be more appropriate to add a temporary emission point under existing "Emission Unit 002 - Raw Material Processing Operations Controlled by Baghouses." This temporary permit will show Emission Unit 002 with the Emission Point U-02-01 designated as "Dust Collector for Fly Ash Silos U-01-01." The layout of the silos is shown in the drawing at the end of this determination.

Following are the exact changes made in the final permit compared with the draft permit:

PLACARD PAGE - STATEMENT OF BASIS

This air construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install and temporarily use fly ash silos with a baghouse and feed equipment. The permittee is authorized to conduct tests for the production rate and fly ash injection capacities in accordance with the conditions of this permit and as described in the application. Apart from the temporary increase in feed rate, clinker production, fuel use rate, and injection of fly ash into the calciner, the permittee shall operate the facility in accordance with the previously approved permits, drawings, plans, and other documents on file with the Florida Department of Environmental Protection ("DEP" or "the Department"). This temporary permit supplements the original air construction permit and its subsequent modifications. It does not modify any other requirements from such previously issued air permits except a provision for certain emissions data exclusion (lb NO_x/ton of clinker) for periods of off-capacity clinker production during the capacity evaluation program.

PAGE 2 AND PAGE 5 – EMISSION UNITS

This permit addresses the following emission units.

EU No.	Emission Unit Description
002	Raw Material Processing Operations Controlled by Baghouses ¹
004	In line kiln/raw mill controlled by baghouse – main stack
005	Clinker cooler controlled by ESP
xxx	Temporary fly ash injection into the calciner

1. Emission Unit 002 includes numerous Emission Points including new Emission Point U-02-01 - Dust Collector for Fly Ash Silos U-01-01.

SECTION 3, CAPACITY EVALUATION PROGRAM, CONDITION 2

2. **Temporary Operating Rates:** Subject to the conditions of this permit, the permittee is authorized to install and temporarily use fly ash silos with a baghouse and feed equipment and is temporarily authorized to conduct a capacity evaluation program to: evaluate the technical feasibility of increasing production in the existing in line kiln/raw mill/clinker cooler system as constructed; evaluate the technical feasibility of increasing production in the in line kiln/raw mill/clinker cooler system by directly injecting fly ash (a raw material) into the calciner; and to determine the emissions at the higher operating rates. Within the electrical, structural, process, and mechanical capabilities of the kiln, the permittee is authorized to temporarily operate at the following maximum process and production rates at any time during the capacity evaluation program.

Emissions Unit Rates	Temporary Maximum Operating Rate Range
004 - Kiln Process	178 to 205 tons per hour (including dry preheater feed plus direct fly ash feed to the calciner) <u>Up to 27 tons per direct fly ash feed to the calciner</u>
	364 to 420 million BTU heat input per hour
005 - Clinker Production	105 to 115.5 tons per hour
xxx — Fly Ash Injection	Up to 27 tons per hour direct feed to the calciner (Included in 205 TPH kiln process rate)

For purposes of the capacity evaluation program only, the clinker production rate identified in the above table shall be determined by the following equation:

$$\text{Clinker Production} = [(\text{Feed}) (\text{Kiln Feed LOI Factor}) + (\text{Fly Ash Injection}) (\text{Fly Ash LOI Factor})]$$

Where:

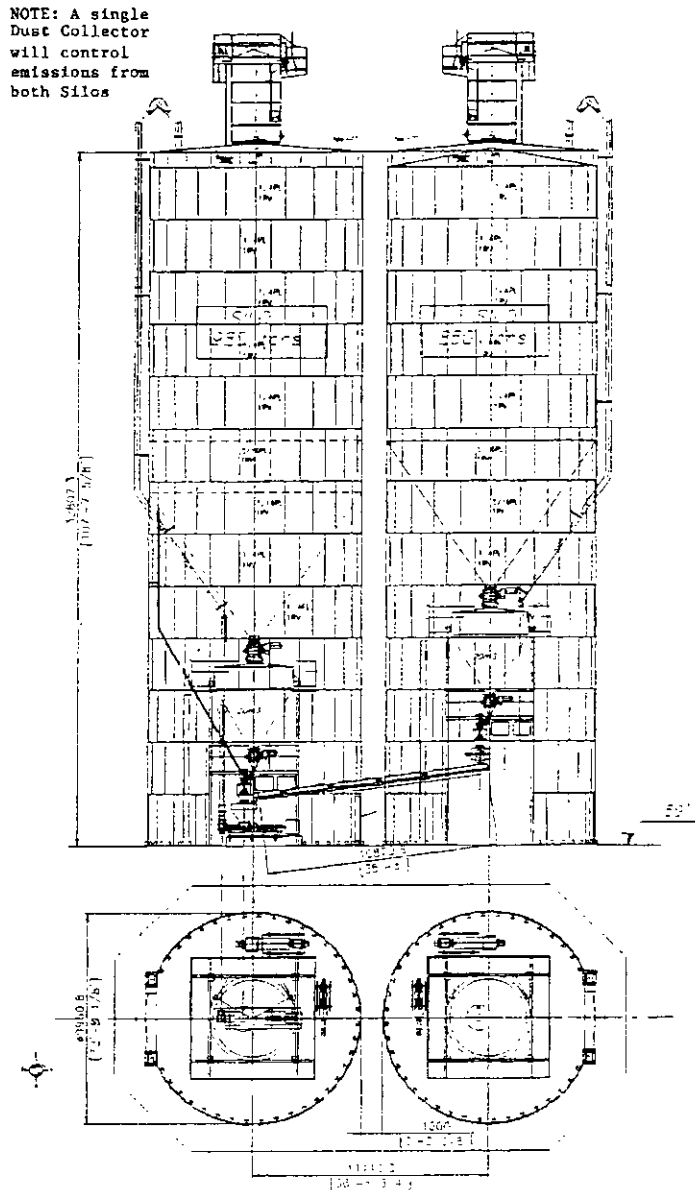
- Kiln feed is determined by the Poldos control system.
- Fly ash is determined from the rotary feed system or equivalent.
- LOI for the kiln feed and fly ash is based on a monthly average determined from daily measurements.

At all times, the emission units shall remain subject to the conditions of all existing permits related to air pollution and control equipment during the temporary capacity evaluation program. All required CEMS and COMS shall be properly functioning when operating within the temporary maximum rate range. [Rule 62-4.070(3), F.A.C.]

4. **Duration:** The temporary capacity evaluation program is limited to no more than 120 operating days and shall end no later than April 30, 2005. Upon completion of the capacity evaluation program or the expiration of this permit (whichever occurs first), the permittee shall cease to operate at production and process rates in excess of the original Air Construction Permit No. 1210465-001-AC (PSD-FL-259) and shall cease to use the temporary fly ash silos, baghouse and injection system. For this permit, "operational day" means any day that includes operation within the temporary maximum rate range specified above. [Applicable Permit, Applicant Request]

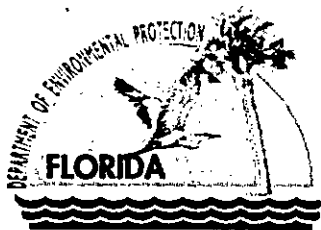
Note: End of changes.

Following is the approximate layout of the fly ash silos.



Side and Overhead Views of Fly Ash Storage Silos

The Department's Final Action is to issue the Air Construction Permit as drafted but with the changes noted above.



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

PERMITTEE

Suwannee American Cement, LLC
Post Office Box 410
Branford, Florida 32008

Authorized Representative:
Celso Martini, Plant Manager

Permit No. 1210465-012-AC
Cement Plant (SIC No. 3241)
Capacity Evaluation Program
Expires: April 30, 2005

PROJECT AND LOCATION

This permit authorizes Suwannee American Cement, LLC to conduct a production capacity evaluation program at the existing Branford Cement Plant located at US Highway 27 and County Road 49 in Suwannee County, Florida. The UTM coordinates are: Zone 17; 321.4 km E and 3315.9 km N.

STATEMENT OF BASIS:

This air construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to install and temporarily use fly ash silos with a baghouse and feed equipment. Permittee is authorized to conduct tests for the production rate and fly ash injection capacities in accordance with the conditions of this permit and as described in the application. Apart from the temporary increase in feed rate, clinker production, fuel use rate, and injection of fly ash into the calciner, the permittee shall operate the facility in accordance with the previously approved permits, drawings, plans, and other documents on file with the Florida Department of Environmental Protection ("DEP" or "the Department"). This temporary permit supplements the original air construction permit and its subsequent modifications. It does not modify any other requirements from such previously issued air permits except a provision for certain emissions data exclusion (lb NOx/ton of clinker) for periods of off-capacity clinker production during the capacity evaluation program.

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- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Michael G. Cooke

Michael G. Cooke, Director
Division of Air Resource Management

10/19/04

(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing Suwannee American Cement (SAC) facility consists of a portland cement plant, the associated quarry, and raw material and cement handling operations. The plant processes raw materials in a preheater/precalciner kiln with in-line raw mill to produce clinker. The clinker is milled and combined with gypsum to produce portland cement.

Authorized fuels for the pyroprocessing system include natural gas, coal, petroleum coke, whole tires and tire derived fuel (TDF). An authorized tire gasification system has not yet been constructed. The plant has a coal processing operation that will crush coal and petroleum coke. Petroleum coke has not yet been used.

The plant was constructed in accordance with Air Permit No. PSD-FL-259, as modified. That permit established short term production limits (24-hour average) of 178 tons per hour (TPH) of material fed to the preheater (dry basis), 105 TPH of clinker, 364 MMBtu per hour of heat input (MMBtu/hr) and 150 TPH of portland cement production. It also specifies annual production limits (based on a rolling 12-month basis) of 1,427,880 tons per year (TPY) of material fed to the preheater (dry basis), 839,500 TPY of clinker production, and 1,191,360 TPY of portland cement production. The plant is currently operating under the air construction permit while awaiting action on the application for a Title V air operation permit.

This current permit project (No. 1210465-012-AC) authorizes SAC to conduct a "capacity evaluation program" to assess the plant's production rate capacity as constructed as well as with a new fly ash injection method. The temporary program is limited to 120 operating days and is scheduled for completion by April 30, 2005. Operational and emissions information gathered during the capacity evaluation program will be used to evaluate the feasibility of a pending request for a permanent increase in the clinker production rate.

This permit authorizes SAC to evaluate the pyroprocessing system at preheater feed rates greater than 178 tons per hour and to determine the efficacy of directly injecting fly ash into the calciner in addition to the preheater. During the capacity evaluation program, the sum of dry material feed to the preheater and fly ash injected into the calciner shall be no greater than 205 TPH, the clinker production rate shall be no greater than 115.5 TPH, and the fuel use limit shall be no greater than 420 MMBtu/hr, all on a 24-hour basis.

Existing permitted emission limits remain unchanged and in effect during the capacity evaluation program except for a provision for the production-based NO_x emissions data exclusion (lb NO_x/ton of clinker) for periods of off-capacity clinker production as specified in this permit.

EMISSION UNITS

This permit addresses the following emission units.

EU No.	Emission Unit Description
002	Raw Material Processing Operations Controlled by Baghouses
004	In line kiln/raw mill controlled by baghouse – main stack
005	Clinker cooler controlled by ESP

REGULATORY CLASSIFICATION

Title III: The Suwannee American Cement Facility is classified as a "Major Source" per 40 CFR 63.2, Definitions (adopted and incorporated by reference by the Department at Paragraph 62-204.800(11)(d)) because it consists of a group of stationary sources located within a contiguous area and under common control that emit or have the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants. The facility is subject to the Major (Greenfield) Source requirements of National Emission

SECTION I. GENERAL INFORMATION

Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry. Code of Federal Regulations (CFR) Title 40, Part 63, Subpart LLL.

Title V: Because potential emissions of at least one regulated pollutant exceed 100 tons per year, the existing facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C. Regulated pollutants include pollutants such as carbon monoxide (CO), nitrogen oxides (NO_x), particulate matter (PM/PM₁₀), sulfur dioxide (SO₂), and volatile organic compounds (VOC).

Prevention of Significant Deterioration (PSD): This facility is located in an area (Suwannee County) designated as "attainment" for all criteria pollutants. The facility is considered a "Portland Cement Plant," which is one of the 28 PSD source categories with the lower PSD applicability threshold of 100 tons per year (see Table 212.400-1, Rule 62-212.400, F.A.C.). Potential emissions of at least one regulated pollutant exceed 100 tons per year. Therefore, the facility is classified as a Major Facility with respect to Rule 62-212.400, F.A.C.

New Source Performance Standards (NSPS): The facility is subject to: 40 CFR 60 Subpart F, Standards of Performance for Portland Cement Plants; 40 CFR 60, Subpart Y, Standards of Performance for Coal Preparation Plants; and 40 CFR 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants.

State Rule: Some emissions units are subject to Rule 62-296.701, F.A.C., Portland Cement Plants.

RELEVANT DOCUMENTS

The documents listed below are the basis of this permit. The permit application and additional information referenced are not a part of this permit, but the information is specifically related to this permitting action and the following documents are on file with the Department.

- Air Permit No. PSD-FL-259 issued on June 1, 2000, which was the original air construction permit for the new facility.
- Air Permit No. PSD-FL-259A issued on November 8, 2002, which modified the permit as follows: added requirement for notification of the anticipated date that equipment would be commissioned; and removed the startup notification specified by 40 CFR 60.7(a)(2) because it was repealed by EPA in 1999.
- Air Permit No. PSD-FL-259B issued on January 18, 2003, which modified the permit as follows: extended expiration date to June 30, 2004; added requirements for plant managers; added construction schedule; added requirements for permit transfer; revised data retrieval requirements; and revised CEMS requirements for kiln.
- Air Permit No. PSD-FL-259C issued on May 15, 2003, which modified the following items: clarified emissions point descriptions for several baghouses; and clarified CEMS requirements for kiln.
- Permit No. 121065-008 (PSD-FL-259D) issued October 18, 2004, 2004, which modifies the permit as follows: extend expiration date to March 31, 2005; install a permanent hydrated lime injection system; base the compliance averaging time for VOC on a 30 operating-day basis instead of a 30 calendar-day basis; and clarify the correct sampling point for determining mercury in raw materials.
- Application No. 121065-012-AC received on August 26, 2004 requesting a 120 operating-day testing program to evaluate production rate and fly ash injection capacity.
- Draft Permit No. 121065-012-AC for this permitting action distributed September 24, 2004.
- Comments received on October 1, 2004 from Suwannee American Cement LLC.
- Final Determination and Final Notice issued October 18, 2004.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All applications for permits to construct or modify an emission unit subject to the Prevention of Significant Deterioration or Nonattainment review requirements should be submitted to the Bureau of Air Regulation, Florida Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400 (phone number: 850/488-0114). All documents related to applications for permits to operate and minor modifications shall be submitted to the Air Resource Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590 (phone number: 904/807-3300).
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resource Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200B, Jacksonville, Florida 32256-7590 (phone number: 904/807-3300).
3. Appendices: The following Appendices are attached as part of this permit: Appendix CF (Citation Formats), Appendix GC (General Conditions), and Appendix GT (General Testing Requirements).
4. Applicable Regulations, Forms, and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the applicable permits and applications. The facility is subject to all applicable provisions of Chapter 403, F.S., Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.; 40 CFR 60 (Subparts A, F, Y, and OOO); and 40 CFR 63 (Subparts A and LLL). The terms used in this permit have specific meanings as defined in the applicable chapters of the F.A.C. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300, and 62-210.900, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No emissions unit or facility subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Additional Permits: The scope of this temporary project is to develop information in support of a separate air construction permit for a permanent production increase. Any final action authorizing a permanent production increase requires a revision to the Title V air operation permit. [Rule 62-213.400, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

This permit addresses the following emission units.

EU No.	Emission Unit Description
002	Raw Material Processing Operations Controlled by Baghouses ¹
004	In line kiln/raw mill controlled by baghouse – main stack
005	Clinker cooler controlled by ESP

1. Emission Unit 002 includes numerous Emission Points including new Emission Point U-02-01 - Dust Collector for Fly Ash Silos U-01-01.

CAPACITY EVALUATION PROGRAM

1. Relation to Other Permits: The conditions of this permit are in addition to those of any other air construction or operation permits. [Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]
2. Temporary Operating Rates: Subject to the conditions of this permit, the permittee is authorized to install and temporarily use fly ash silos with a baghouse and feed equipment and is temporarily authorized to conduct a capacity evaluation program to: evaluate the technical feasibility of increasing production in the existing in line kiln/raw mill/clinker cooler system as constructed; evaluate the technical feasibility of increasing production in the in line kiln/raw mill/clinker cooler system by directly injecting fly ash (a raw material) into the calciner; and to determine the emissions at the higher operating rates. Within the electrical, structural, process, and mechanical capabilities of the kiln, the permittee is authorized to temporarily operate at the following maximum process and production rates at any time during the capacity evaluation program.

Emissions Unit Rates	Temporary Maximum Operating Rate Range
004 - Kiln Process	178 to 205 tons per hour (including dry preheater feed plus direct fly ash feed to the calciner)
	27 tons per direct fly ash feed to the calciner
	364 to 420 million BTU heat input per hour
005 - Clinker Production	105 to 115.5 tons per hour

For purposes of the capacity evaluation program only, the clinker production rate identified in the above table shall be determined by the following equation:

$$\text{Clinker Production} = [(\text{Feed}) (\text{Kiln Feed LOI Factor}) + (\text{Fly Ash Injection}) (\text{Fly Ash LOI Factor})]$$

Where:

- Kiln feed is determined by the Poldos control system.
- Fly ash is determined from the rotary feed system or equivalent.
- LOI for the kiln feed and fly ash is based on a monthly average determined from daily measurements.

At all times, the emission units shall remain subject to the conditions of all existing permits related to air pollution and control equipment during the temporary capacity evaluation program. All required CEMS and COMS shall be properly functioning when operating within the temporary maximum rate range. [Rule 62-4.070(3), F.A.C.]

3. Schedule: At least 14 days before beginning the capacity evaluation program, the permittee shall submit to the Permitting and Compliance Authorities a preliminary schedule detailing the program phases, operating scenarios, operational data collection, emissions data collection, and emissions testing protocol. The permittee shall update the schedule as necessary. [Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

4. Duration: The temporary capacity evaluation program is limited to no more than 120 operating days and shall end no later than April 30, 2005. Upon completion of the capacity evaluation program or the expiration of this permit (whichever occurs first), the permittee shall cease to operate at production and process rates in excess of the original Air Construction Permit No. 1210465-001-AC (PSD-FL-259) and shall cease to use the temporary fly ash silos, baghouse and injection system. For this permit, "operational day" means any day that includes operation within the temporary maximum rate range specified above. [Applicable Permit, Applicant Request]
5. Operating Scenarios: The permittee shall evaluate the following operating scenarios.
 - a. *Case 1*: Operate the in-line kiln system within the temporary maximum rate range without direct fly ash injection to the calciner to evaluate the existing capacity as constructed. At least 8 hours of data shall be gathered to identify the existing capacity as constructed.
 - b. *Case 2*: Operate the in-line kiln system at a clinker production of approximately 105 tons per hour while injecting fly ash directly into the calciner at intervals of 3 tons per hour until the maximum fly ash injection capacity for the temporary fly ash injection system is determined. At least 3 hours of data shall be gathered at each fly ash injection rate.
 - c. *Case 3*: Operate the in-line kiln system within the temporary maximum rate range while injecting fly ash directly into the calciner at intervals of 3 tons per hour until the maximum fly ash injection capacity for the temporary fly ash injection system is determined. At least 3 hours of data shall be gathered at each fly ash injection rate.

The permittee may evaluate other operating scenarios within the temporary maximum rate range as necessary. All operation shall be within the electrical, structural, process, and mechanical capabilities of the kiln. If the above specified operating rates or fly ash injection rates are not possible, the permittee shall document this with the suspected reason. Whenever operating within the temporary maximum rate range or directly injecting fly ash into the calciner, the permittee shall continuously monitor and record the following information: dry feed material to the preheater (TPH); fly ash feed directly to the calciner (TPH); clinker production (TPH) by indirect calculation method as defined in Condition 2; clinker production (TPH) by direct measurement using the installed weigh scale; heat input rates (MMBtu/hour) to the kiln from each fuel in use; all required CEMS data; and all required COMS data. [Rule 62-4.070(3), F.A.C.]

EMISSIONS

6. Emissions Standards: Except as described in Condition 7, this permit does not change any emission standards or establish any new emissions standards for the in line kiln system. During the temporary capacity evaluation program, the in line kiln system shall comply with the requirements of all existing, valid Department permits. [Rules 62-4.030, 62-4.070(3), and 62-210.300(1)(b), F.A.C.]
7. NO_x Data Exclusion: The following provisions apply only during the capacity evaluation program and only for 24-hour periods during which fly ash is directly injected into the calciner.
 - a. "Off-capacity clinker production" is defined as clinker production below 85 tons per hour.
 - b. If the 24-hour period includes off-capacity clinker production, up to two 1-hour production-based NO_x emission averages (lb/ton clinker) collected during such periods may be excluded from the 24-hour compliance average.
 - c. No such data exclusion is permitted for clinker production below 85 tons per hour unless fly ash is being injected directly into the calciner. Operators shall minimize such incidents of off-capacity clinker production to the extent possible. The owner or operator shall monitor and record the number of 1-hour NO_x emission rates excluded from the determination of compliance with the production-based NO_x emission limit. [Applicant Request].

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

8. Unconfined Particulate Emissions: During the capacity evaluation program, unconfined particulate matter emissions shall be minimized by taking the reasonable precautions specified in the current air construction permit, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

EMISSIONS TESTING AND MONITORING REQUIREMENTS

9. Test Notification: The permittee shall provide at least a 15-day advance notice of any scheduled stack tests to afford the Compliance Authority the opportunity to witness the tests. If unavoidable circumstances occur that would delay the stack tests, the permittee shall keep the Compliance Authority informed of the delays and the new schedule. At its discretion, the Compliance Authority may allow a shorter advance notice. [Rule 62-297.310(7)(a)9, F.A.C.]
10. Stack Tests – In Line Kiln (EU-004): Within the electrical, structural, process, and mechanical capabilities of the in-line kiln system, the permittee shall conduct the stack tests in accordance with the following provisions.
- At the operating rates specified below, the permittee shall conduct stack tests (one for each pollutant) to determine compliance with the existing emissions standards for carbon monoxide and particulate matter.
 - The permittee shall conduct dioxin/furan tests if there is a significant change in the feed that was used in the previous performance test. A Loss on Ignition (LOI) value of 30 percent or more shall be considered a significant change in the feed.
 - For mercury, the permittee shall calculate and report mercury emissions in accordance with the procedure specified in the current air construction permit.
 - Stack testing shall be performed at the in-line kiln main stack while the preheater, kiln, precalciner, cooler, and raw mill are operating simultaneously (compound operation). For each required stack test, the permittee shall operate the in-line kiln system to produce at least 110 tons per hour of clinker while injecting fly ash directly into the calciner within at least 90% of the highest sustained fly ash injection rate as determined by the results of operating scenario Case 3 in Condition 5.
 - The permittee shall conduct each required stack test using the methods approved in the current air construction permit. Each required stack test shall consist of at least three test runs.
 - For each required stack test, the permittee shall report the following continuous monitoring data: nitrogen oxides, sulfur dioxide, volatile organic compounds (total hydrocarbons), and opacity. In addition, the permittee shall report the continuous opacity monitoring data from the clinker cooler (EU-005) for each required test.
 - For each required stack test, the permittee shall report the following information: dry feed material to the preheater (TPH); fly ash feed directly to the calciner (TPH); clinker production (TPH) by indirect calculation method as defined in Condition 2; clinker production (TPH) by direct measurement using the installed weigh scale; and heat input rates (MMBtu/hour) to the kiln from each fuel in use.
 - During each day that stack tests are conducted on the in-line kiln system (EU-004), a representative sample of each fuel used shall be taken and analyzed for the following fuel properties: heating value (Btu/lb), moisture (% by weight), nitrogen (% by weight), sulfur (% by weight), chlorides (% by weight), ash (% by weight), and mercury (ppm by weight).
 - During each day that stack tests are conducted on the in-line kiln system (EU-004), a representative sample of the fly ash injected into the calciner shall be taken and analyzed for the same constituents as preheater feed. In addition, the fly ash shall be tested for ammonia, chloride, carbon, loss on ignition (LOI), and mercury.

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

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

11. Test Procedures: General stack test procedures are summarized in Appendix GT of this permit. [Rule 62-297.310, F.A.C.]
12. Monitoring: During the capacity evaluation program, the permittee shall continuously monitor and record all information specified by the existing air construction permit including operational parameters, CEMS data, and COMS data. [Rule 62-4.070(3), F.A.C.]

RECORDS AND REPORTS

13. Stack Test Reports: The permittee shall prepare and submit reports for all required stack tests in accordance with the requirements in Rule 62-297.310(8), F.A.C. The permittee shall submit a written report that summarizes the results within 45 days of completing each required stack test. All stack test data collected during the temporary testing program shall be submitted for review. For each test run, the report shall also indicate the following information: dry material feed to the preheater (TPH); fly ash injection directly to the calciner (TPH); clinker production (TPH); heat input rates (MMBtu/hour) from each fuel in use; CEMS and COMS data; and ambient conditions.
14. Fuel and Fly Ash Analyses: Within 45 days of taking a fuel or fly ash sample required by this permit, the permittee shall submit a report detailing the results of the analyses. [Rule 62-4.070(3), F.A.C.]
15. CEMS Data: The permittee shall provide the Department with data disks containing all CEMS data and production data for the duration of the capacity test. The permittee shall provide a description to decipher and review the data. The data should indicate when the raw mill is on (compound operation) and when it is off. [Rule 62-4.070(3), F.A.C.]
16. Final Report on the Capacity Evaluation Program: Within 90 days of completing the capacity evaluation program and no later than July 30, 2005, the permittee shall submit a technical report detailing the capacity evaluation program and its findings. The report shall be comprehensive and include, but not be limited to, the following:
 - For each day the plant operated within the temporary maximum rate range or directly injected fly ash into the calciner, an hour-by-hour summary of the following information: dry material feed to the preheater (TPH); fly ash injection directly to the calciner (TPH); clinker production (TPH); portland cement production (TPH); heat input rates (MMBtu/hour) from each fuel in use; CEMS data; and COMS data.
 - For each emissions stack test conducted, a summary of the information required in Condition 13.
 - An assessment of the precision and accuracy of the methods used to determine feed material rates and indirectly calculate clinker production.
 - An assessment of the precision and accuracy of direct measurement of clinker production using the installed scales.
 - A discussion of any operational problems encountered at the higher authorized rates.
 - Details of any mechanical, electrical, structural, and process limitations that were identified during the course of the capacity evaluation program.[Rule 62-4.070(3), F.A.C.]
17. Engineering Report on Kiln: Any future or pending applications for a permanent production increase shall include an engineering report describing the full capability of the kiln to sustain the requested production rates while meeting proposed emission rates. The report shall be sealed by professional engineers or other experts as appropriate in structural, mechanical, electrical, process, and environmental disciplines. A single report from the kiln manufacturer would suffice to fulfill this requirement. [Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

19. Emissions Limited and Subject to Revision for SO₂ and NO_x: Based on results of compliance tests and continuous monitoring data, the Department may revise the emission limits for sulfur dioxide and nitrogen oxides downward to make these limits more stringent provided that overall control attained for all air pollutants including SO₂, NO_x, VOC and CO is optimized. Such revision shall be based on data that represents a full range of operating conditions and a representative period of time. Such revision, if required by the Department, shall be in the form of a federally enforceable permit and shall be publicly noticed by the permittee.

[Rules 62-4.070(3) and 62-212.400(7)(a), F.A.C., Permit 1210465-001 (PSD-FL-259)]

APPENDIX GC
General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:
 - a. Have access to and copy and records that must be kept under the conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of non-compliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

APPENDIX GC

General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (N/A);
 - b. Determination of Prevention of Significant Deterioration (N/A); and
 - c. Compliance with New Source Performance Standards (N/A).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - 1) The date, exact place, and time of sampling or measurements;
 - 2) The person responsible for performing the sampling or measurements;
 - 3) The dates analyses were performed;
 - 4) The person responsible for performing the analyses;
 - 5) The analytical techniques or methods used; and
 - 6) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

FINAL DETERMINATION

Suwannee American Cement Plant

Extension of Permit and Hydrated Lime Injection

DEP File No. 1210465-008-AC (PSD-FL-259D)

On September 24, 2004 the Florida Department of Environmental Protection (Department) distributed an "Intent to Issue Air Construction Permit Modification" to construct a hydrated lime injection system and to extend the expiration date of the permit to construct the Suwannee American Cement Plant located on U.S. Highway 27, in Suwannee County. The Draft Permit Modification also proposed a compliance averaging time for volatile organic compounds of 30 operating (instead of calendar) days and clarified two inconsistent conditions related to mercury sampling.

The package included the Department's Draft Air Construction Permit Modification, the "Intent to Issue Air Construction Permit Modification," the "Technical Evaluation and Preliminary Determination," and the "Public Notice of Intent to Issue Air Construction Permit Modification." The Department sent copies of the package to various persons, agencies, and municipalities including those who had asked that they be informed of any Department permitting activities related to the subject facility. Suwannee American Cement, LLC published the Public Notice in The Suwannee Democrat on October 1, 2004 and provided to the Department the required proof of publication.

The Department received no comments on the Draft Air Construction Permit. At the request of the Department, Suwannee American Cement supplied an emission point number (unspecified in the draft) for the required baghouse that will control dust from the hydrated lime injection system. The emission Point is designated as H-08A-01, "Dust Collector for hydrated lime silo E-30-01". Section III, Subsection B, Condition 14 will read as follows:

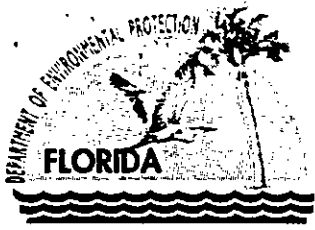
14. Emissions Unit 002: Emissions unit 002 shall have the following emission points:

EMISSION POINT	DESCRIPTION
E-28	Dust collector – Aeropol at the homogenizing silo
E-34	Dust collector for off-spec feed handling
G-07	Dust collector for homogenizing silo inlet
H-08	Dust collector for homogenizing silo outlet
<u>H-08A-01</u>	<u>Dust collector for hydrated lime silo E-30-01</u>

This permit authorizes permanent installation of the following equipment for the injection of hydrated lime: lime silo, baghouse, control system and associated ductwork. Hydrated lime may be injected near the top of the preheater as an option to control SO₂ emissions.

The remainder of Condition 14 is unchanged.

The final action is to issue the Air Construction Permit Modification as drafted but with the specified emission point number.



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

October 18, 2004

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. 1210465-008-AC (PSD-FL-259D)
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

The Florida Department of Environmental Protection ("the Department") reviewed your application dated April 26, 2004 requesting a further extension of the original air construction permit from June 30, 2004 through June 30, 2006. Consistent with our conversations and your written correspondence, tires and fly ash will be combined with other applications under review by the Department.

At this time the plant has already been constructed and Suwannee American Cement (SAC) has shown that it can operate at the authorized production rate and emission limits. The request to extend the construction permit through 2006 was based upon timing for the fly ash and tire project which have been deferred and consolidated with other requests. We believe that an extension through July 31, 2005 is sufficient to construct the hydrated lime system and complete the Title V Operation Permit application.

The Department also eliminated prior inconsistencies within the permit for mercury (Hg) sampling to clarify that Hg in the raw materials will be determined prior to introduction into the raw mill instead of the preheater. Lastly, the Department considered use of the same reporting bases for the volatile organic compounds (VOC) BACT limit as EPA's total hydrocarbons (THC) MACT limit.

This facility was originally authorized and constructed pursuant to Permit No. PSD-FL-259 issued on June 1, 2000. This permit action supplements Permit No. PSD-FL-259 and the changes dated November 8, 2002, January 18, 2003, and May 15, 2003 to that permit. Unless otherwise specified, this permit action does not alter any requirements of that permit. Permit No. PSD-FL-259 is hereby supplemented and modified as follows.

"More Protection, Less Process"

Printed on recycled paper.

PLACARD PAGE 1

The expiration date on this page is changed from June 30, 2004 to July 31, 2005.

FACILITY-WIDE SPECIFIC CONDITIONS

ADMINISTRATIVE

6. Expiration: This air construction permit shall expire on ~~June 30, 2004~~ July 31, 2005. The permittee, for good cause, may request that this construction and PSD permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit.

[Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C.]

PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

[40 CFR 52.21(r)(2)]

BACT Determination: In conjunction with extension of the 18 month periods to commence or continue construction, or extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [40 CFR 52.21(j)(4)] ~~The Department will not require demonstration of adequacy unless an extension is requested beyond June 30, 2004.~~

{Permitting Note: The basic cement manufacturing plant has been constructed and the plant has met its permitted BACT limits. The purpose of the extension is to allow sufficient time to complete the application for a Title V air operation permit and install permanent equipment for hydrated lime injection. The Department retains the authority to set final SO₂ and NO_x limits pursuant to the Section III, Subsection B, Condition 12 reproduced below.}

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

SUBSECTION B.

STATE REQUIREMENTS

EMISSION LIMITATIONS AND PERFORMANCE STANDARDS

12. Emissions Limited and Subject to Revision for SO₂ and NO_x: Emissions from the facility shall not exceed the limitations specified in this permit. Based on results of compliance tests and continuous monitoring data, the Department may revise the emission limits for sulfur dioxide and nitrogen oxides downward to make these limits more stringent provided that overall control attained for all air pollutants including SO₂, NO_x, VOC and CO is optimized. Such revision shall be based on data that represents a full range of operating conditions and a representative period of time. Such revision, if required by the Department, shall be in the form of a federally enforceable permit and shall be publicly noticed by the permittee. [Rules 62-4.070(3) and 62-212.400(7)(a), F.A.C.]

{No change in this condition. Reproduced as cross reference to Facility-Wide Specific Condition 6.}

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

EMISSION POINT	DESCRIPTION
E-28	Dust collector – Aeropol at the homogenizing silo
E-34	Dust collector for off-spec feed handling
G-07	Dust collector for homogenizing silo inlet
H-08	Dust collector for homogenizing silo outlet
<u>H-08A-01</u>	<u>Dust collector for hydrated lime silo E-30-01</u>

This permit authorizes permanent installation of the following equipment for the injection of hydrated lime: lime silo, baghouse, control system and associated ductwork. Hydrated lime may be injected near the top of the preheater as an option to control SO₂ emissions.

The remainder of Condition 14 is unchanged.

15. Emissions Unit 004:

This condition is unchanged with the exception of Note 6 to the associated Table. Note 6 is modified as follows:

^b The averaging time for VOC shall be a 30 ~~calendar~~ operating-day block average computed in accordance with specific condition 18 of this subsection.

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

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. 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~~ operating-day block average that shall be computed as the arithmetic average of all valid hourly averages occurring within each 30 ~~calendar~~ operating-day block.
- b., c., and d. are unchanged.
- 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. The VOC (or THC) CEM system shall be installed, operated and maintained in accordance with Performance Specification 8A of Appendix B in 40 CFR 60. The system shall comply with all of the requirements for continuous monitoring systems found in the general provisions of Subpart A in 40 CFR 63. It is not a requirement to calculate hourly rolling averages in accordance with Section 4.9 of Performance Specification 8A. Compliance with the emission limit for VOC (or

THC) shall be computed as the arithmetic average of all valid emissions data collected for a block of 30 operating days. For purposes of the VOC (or THC) limit, an operating day is any day that the kiln produces clinker and/or fires fuel. Emissions data are only used for the determination of a single 30 operating-day block average. Emissions shall be reported in units of the standards (lb/hour, lb/ton clinker, and ppmvd as propane corrected to 7% oxygen). These requirements shall be interpreted to be consistent with the monitoring requirements specified in 40 CFR 63.1350. [Permit Nos. PSD-FL-259 C and D]

The remainder of Condition 18 is unchanged.

27. Material Balance Records of Mercury: The owner or operator shall demonstrate compliance with the mercury throughput limitation by material balance and making and maintaining records of monthly and rolling 12-month mercury throughput. The owner or operator shall, for each month of sampling required by this condition, perform daily sampling of the raw mill feed ~~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. The owner or operator shall determine the mass of mercury introduced into the pyroprocessing system (in units of pounds per month) from the total of the product of the mercury content from the monthly composite analysis and the mass of each material or fuel used during the month. The consecutive 12-month record shall be determined from the individual monthly records for the current month and the preceding eleven months and shall be expressed in units of pounds of mercury per consecutive 12-month period. Such records shall be completed no later than 25 days following the month of the records. To determine the mercury content of the feed material and fuels to be used in the monthly calculation, sampling and analysis shall be performed in accordance with the following schedule:
- i. For the first quarter of the operation of the plant, sample for each month of the quarter and analyze each month's composite sample.
 - ii. For the next three quarters, sample for one month of each quarter and analyze that month's composite sample.
 - iii. For each year thereafter, sample for one month of each year and analyze that month's composite sample, except as follows.
 - a. If there is a change in feed material or fuels utilized from those previously sampled and analyzed, the frequency shall revert to ii. above, for the next three quarters.
 - b. If the monthly composite analysis shows a total monthly mercury throughput of greater than 6.2 pounds per month of mercury introduced into the pyroprocessing system, the frequency shall revert to ii. above, for the next three quarters or until the monthly throughput is less than or equal to 6.2 pounds per month, whichever is longer.

[Rule 62-4.070(3), F.A.C.; Permit No. PSD-FL-259D]

{Permitting Note: Permit No. PSD-FL-259D changed a mercury sampling location identified as the "preheater feed material from the blend silo" to the "raw mill feed". This is the correct monitoring point as stated in Final Order OGC Case No. 99-116, DOAH Case No. 99-3096 and the sampling locations are now consistent with those identified in Condition 13.}

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

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



Michael G. Cooke, Director
Division of Air Resource
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 10/20/04 to the person(s) listed:

Celso Martini, SAC*	Jim Stevenson, DEP	Patrice Boyes, Esq.*
Claude Grinfeder, SAC*	Tom Workman, DEP	Kathy Cantwell
Joe Horton, SAC	Mark Latch, DEP	Ralph Ashodian
Larry Sellers, Esq.*	December McSherry	Virginia Seacrist
Frank Darabi, P.E.	Sven Lindskold	Bob and Lynn Milner
Steve Cullen, P.E.	Tom Greenhalgh*	Linda Pollini
John Koogler, P.E.	Dave Bruderly	Helen Beaty
Chris Kirts, DEP NED	Chris Bird, Alachua Co. DER	Bessie Robinson
Jim Little, EPA	Chair, Alachua Co. BCC*	Craig Pittman, St. Pete Times
John Bunyak, NPS	J. Calvin Gaddy	Chuck Yagel*

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.


(Clerk)

10/20/04
(Date)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> 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. 	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>C. Date of Delivery</p>
<p>1. Article Addressed to: Mr. Larry Sellers Holland & Knight, LLP Post Office Drawer 810 Tallahassee, Florida 32301</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2.</p> <p>P:</p>	<p>TALLAHASSEE FL 32301 OCT 25 2004</p> <p>102595-02-M-1540</p>

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

7000 1670 0013 3109 9236

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

See To
 Mr. Larry Sellers
 Holland & Knight, LLP
 Post Office Box 810
 Tallahassee, Florida 32301

PS Form 3800, May 2000 See Reverse for Instructions

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *Susan Vaughan* Agent Addressee

B. Received by (Printed Name) *Susan Vaughan* C. Date of Delivery *10-22-04*

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

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

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number **7000 1670 0013 3109 8741**
 (Transfer from service label)

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

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 Grinfelder
 Suwannee American Cement
 Post Office Box 410
 Branford, Florida 32008

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 X *Susan Vaughan* Agent Addressee

B. Received by (Printed Name) *Susan Vaughan* C. Date of Delivery *10-22-04*

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

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

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number **7000 1670 0013 3109 8765**
 (Transfer from service label)

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

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

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

Sent To **Mr. Claude Grinfelder**
Suwannee American Cement
 Street, Apt. No. or P.O. Box No. **Post Office Box 410**
 City, State, ZIP+4 **Branford, Florida 32208**

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

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

Sent To **Mr. Celso A. Martini, Plant Manager**
Suwannee American Cement
 Street, Apt. No. or P.O. Box No. **Post Office Box 410**
 City, State, ZIP+4 **Branford, Florida 32008**

7000 1670 0013 3109 8741

7000 1670 0013 3109 8765

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:

Ms. Patrice Boyes, Esq.
 Boyes & Associates, PA
 Post Office Box 358684
 Gainesville, Florida 32635-8584

COMPLETE THIS SECTION ON DELIVERY

A. Signature
 Agent
 Addressee

B. Received by (Printed Name) NADIA LEA C. Date of Delivery

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

NOV 25 2004
 MOBILE ALABAMA

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

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number 7000 1670 0013 3109 8468
 (Transfer from service label)

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION

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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. Tom Greenhalgh
 1211 Paul Russell Road
 Tallahassee, Florida 32301-7102

COMPLETE THIS SECTION ON DELIVERY

A. Signature T. Greenhalgh Agent
 Addressee

B. Received by (Printed Name) T. GREENHALGH C. Date of Delivery 11-3-04

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

NOV 3 2004
 TAMPA FLORIDA

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

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number 7000 1670 0013 3109 8734
 (Transfer from service label)

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

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

7000 1670 0013 3109 8468

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

Postmark
Here

Sent To
 Ms. Patrice Boyes, Esq.
 Boyes & Associates, PA
 Post Office Box 358684
 Gainesville, Florida 32635-8584

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

7000 1670 0013 3109 8734

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

Postmark
Here

Sent To
 Mr. Tom Greenhalgh
 1211 Paul Russell Road
 Tallahassee, Florida 32301-7102

7000 1670 0013 E1013 31013 9229

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

[Redacted area]

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

Sent To
 Mr. Chuck Yagel
 Suwannee Industrial Solution, LLC
 26841 CR 49
 City, State, ZIP+4
 Branford, Florida 32008

7000 1670 0013 E1013 31013 9762

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

[Redacted area]

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

Sent To
 Ms. Patrice Boyes
 Boyes & Associates
 P.O. Box 1424
 City, State, ZIP+4
 Gainesville, FL 32602