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November 16, 2004

BUREAU OF AIR REGULATION

Mr. Al Linero  
Division of Air Resources  
Department of Environmental Protection  
2600 Blair Stone Road, MS # 5500  
Tallahassee, Florida 32399-2400

**SUBJECT: Response to Request for Additional Information (RAI), September 3, 2004**  
Suwannee American Cement – Branford Plant  
Facility ID No. 1210465  
PSD-FL-259D

Dear Mr. Linero:

In response to the request for additional information dated September 3, 2004 Suwannee American Cement (SAC) wishes to offer the following information. SAC will respond in general to the sections outlined in the Department's RAI with text from the Department's letter *italicized*.

*Fly ash injection and permanent production increase:*

SAC has since requested a temporary test for the injection of fly ash as well as testing for increased capacity. DEP issued a Final Test Permit (DEP File No. 1210465-012-AC Production Capacity and Fly Ash Injection Test) on October 20, 2004. SAC began testing upon receiving the Final Test Permit. The intent of the testing was to gather information and data to further address questions by the Department. At the completion of testing SAC will submit to the Department a report detailing the results of the testing. SAC requests additional time to respond to the questions around the Permanent Fly Ash Injection and Production Permit Application until completion of testing. Upon completion of testing the report submitted to the Department will address specific question outlined in the September 3, 2004 letter.

*Hydrated Lime:*

SAC provided additional information to the Department and SAC received Final Permit (DEP File No. 1210465-008-AC Extension of Permit and Hydrated Lime Injection) on October 20, 2004.

*Clinker Scales:*

SAC provided additional information with regards to all requests for information on clinker scales to the Department on September 20<sup>th</sup>. In addition several personnel from the Department have conducted inspections of the clinker scale.

Wheel Wash:

SAC provided additional information with regards to all requests for information on clinker scales to the Department on September 20<sup>th</sup>. In addition several personnel from the Department have conducted inspections of the proposed wheel wash.

Tire Derived Fuel:

SAC has received an extension of the Original PSD Permit which allowed for construction and operation use of whole tires or a tire gasification system for fuel in the calciner. SAC is still considering other possible tire systems such as Suspension Tire Burning. SAC would request additional time for consideration of any other operations before addressing questions posed by the Department. This may include requests by SAC for testing of a system to gather more information for the questions asked by the Department.

If you have any questions or require any additional information, please feel free to contact me at (386) 935-5039 or by e-mail at [jbhorton@suwanneecement.com](mailto:jbhorton@suwanneecement.com).

Sincerely,



Joe Horton  
Suwannee American Cement

CC: Celso Martini – SAC  
Trina Vielhauer – DEP  
Chris Kirts – DEP, NED  
Dr. John Koogler - Koogler and Associates

**Cooke, Michael**

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**From:** Wells, Deena  
**Sent:** Tuesday, October 19, 2004 10:03 AM  
**To:** Cooke, Michael  
**Subject:** FW: SAC

Michael,

Could you please include me.

Many thanks.  
Deena

-----Original Message-----

**From:** Mosteller, Cragin  
**Sent:** Tuesday, October 19, 2004 8:57 AM  
**To:** Wells, Deena  
**Subject:** FW: SAC

FYI

-----Original Message-----

**From:** Cooke, Michael  
**Sent:** Monday, October 18, 2004 10:22 AM  
**To:** Morgan, Larry; Taylor, Mario; Bedwell, Allan; Cooper, Cameron; Joyner, Mike  
**Cc:** Vielhauer, Trina; Kirts, Christopher; Schweiss, Russell; Mosteller, Cragin  
**Subject:** SAC

We are ready to issue to SAC the permits for: an extension of time (to July 31, 2005) to make the hydrated lime injection system permanent; the change in the Hg sampling language in the permit to conform the language to the hearing officer's original order and to make the permit internally consistent; clarification of the language regarding how to measure THC/VOC for compliance purposes; and authorization to install for testing only a fly ash injection mechanism. These have been public noticed and we have received no comments other than from SAC. SAC's comments (which sought to clarify that they could build silos, etc., only for purposes of conducting the fly ash tests) have been addressed by including such clarification. I plan to sign these today. Please let me know if anyone has any questions or concerns. Thanks. Mike

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Michael G. Cooke  
Director, Division of Air Resource Management  
Florida Department of Environmental Protection  
MS 5500 2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

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10/19/2004

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