



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

September 3, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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

Re: DEP File No. 1210465 -008, 009, 010 and 011
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

As you are aware, the Department is reviewing several Suwannee American Cement permitting applications at this time. The status of these various applications is as follows.

The Department reviewed the status of the application dated April 26, 2004 to: extend the expiration date of the construction permit until June 30, 2006; implement a flyash injection project; and modify the design of the tire derived fuel system. Per the DEP letter dated July 27, 2004 the application is still incomplete. The submittal dated July 28, 2004 (received August 6) did not address the details of the tire system that we had requested.

The July 28, 2004 submittal also contained a new Long Form permit application to:

- Modify the fly ash injection project to include a permanent production increase;
- Add a 30-day NO_x limit of 2.6 lb/ton of clinker after one year of operation at the higher rate;
- Construct a permanent hydrated lime system;
- Revise permit language with respect to direct measurement of clinker production; and
- Remove the truck wheel washing requirement.

This application is also incomplete as discussed at a meeting in Tallahassee on August 16, 2004. The Department requests the following additional information regarding the July 28, 2004 application:

Fly ash injection and permanent production increase:

Why will it require 15% more raw materials to make only 10% more clinker?

Provide sample calculations for weighing and converting raw materials introduced via preheater feed, flyash (calciner) feed, steel belts, coal ash, etc. to clinker production.

Provide a review of rated capacity of key components including fans, raw mill, coal mill, crushers, and burners compared with the permitted and requested production limits.

"More Protection, Less Process"

Printed on recycled paper.

Mr. Celso Martini, Plant Manager
Suwannee American Cement
September 3, 2004
Page 2 of 3

How will increased production affect the ability to control NOx? For example, how will increased gas flow affect residence time in the calciner and the ability to complete the NOx destruction reactions?

Provide an expert report regarding the mechanical, structural, electrical and process capability of the kiln, calciner, preheater, and control equipment to support such an increase. A report from the manufacturer would suffice for this requirement.

How will increased production affect the tendency to form blockages and situations that could cause additional startups, shutdowns and malfunctions?

Please develop a clear explanation regarding the phenomena that have made it difficult to use the kiln inlet burner. By not using the kiln inlet burner, the opportunity to take advantage of fast high temperature NOx reduction in a reducing atmosphere is lost. Advise what measure will be taken to address the coating problems.

Provide an assessment of chemical balances and imbalances that contribute to the coatings such as sources of chlorides (raw materials, coal, alkali-to-sulfur ratio, etc.).

Explain why the MSC system installed at SAC cannot meet a 30-day NOx limit at least as stringent as 2.45 lb NOx/ton clinker or lower after the production increase and process modifications.

Based upon the August 16, 2004 meeting, SAC anticipated incompleteness items on the fly ash injection project and the permanent production increase and delivered a subsequent application on August 26, 2004. This August 26 application is a proposal to conduct production capacity and fly ash injection testing during 120 operating days in a six month period. The August 26, 2004 application is still under review. We will advise you by September 29, 2004 whether or not the application is complete and provide you with our request for additional information if warranted.

Hydrated Lime:

On page 15 of the application for Emissions Unit 002 (Raw Material Processing), the application states the following, "Hydrated lime will be introduced with preheater feed at the top of the preheater, as necessary to control SO₂ (See Attachment 001). The lime will be fed pneumatically from a 40 ton capacity silo to the preheater at a rate of up to approximately one percent of the preheater feed rate; or about 20-25 tons per hour. For design purposes, the silo discharge rate is 30 tph. The silo filling rate will be approximately 50 tph." The maximum preheater feed rate is 178 tons per hour. One percent of this feed rate is approximately 2 tons per hour and not 20-25 tons per hour. Please correct the maximum lime feed rate or otherwise clarify the application.

Clinker Scales:

The Department requires submittal of the following: copies of the clinker scale manuals; documentation of calibrations; comparisons of the precision and accuracy between the direct clinker measurement method and the method that will be used considering the addition of the new streams.

Wheel Wash:

As discussed at the August 16, 2004 meeting, the Department requires submittal of at least the following information: the design drawings for the wheel wash system; drawings of the portion of the project constructed; a list of remaining tasks to activate the system; copy of any applications submitted to the Department's Northeast District in pursuit of the authorization need to activate the system; documentation that visible emissions and particulate matter concentrations near the property

Mr. Celso Martini, Plant Manager
Suwannee American Cement
September 3, 2004
Page 3 of 3

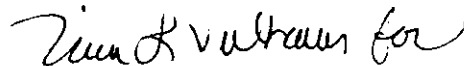
boundary have remained within the limits allowed by the permit and rules; pictures or video clips documenting the adequacy of present procedures to minimize dust.

In addition to the information itemized above, we will conduct on-site inspections to observe the procedures in place and the level of dust generated by trucks leaving the facility.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."*

If you have any questions regarding this matter, please call me at 850/921-9523.

Sincerely,

A handwritten signature in cursive script, appearing to read "A. A. Linero for".

A. A. Linero, Program Administrator
South Permitting Section

Cc: John Koogler, P.E.
Joe Horton, SAC
Chris Kirts, DEP NED

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

2. Article Number*(Transfer from service label)*

7000 1670 0013 3110 3117

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

X *Susan Vaughan* Agent
 Addressee

B. Received by (Printed Name)*Susan Vaughan***C. Date of Delivery***9/20/04*

- 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

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 3110 3117

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

Postmark
Here

Send To
 Mr. Celso Martini, Plant Manager

At
 Suwannee American Cement

Post Office Box 410

City, State, ZIP+4
 Branford, Florida 32008

PS Form 3800, May 2000

See Reverse for Instructions