



Jeb Bush  
Governor

# Department of Environmental Protection

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

Colleen M. Castille  
Secretary

July 27, 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 and 009 (PSD-FL-259D)  
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

The Department received your response to our request for additional information on June 24 2004 related to your projects to install a fly ash injection system and a different tire burning system than already permitted. We also received a letter on July 9 requesting changes to the clinker production measurement requirement as well as installation of a permanent hydrated lime injection system. We advised your Environmental Manager that the latter request requires a professional engineer seal prior to review.

The applications for the flyash and tire introduction system are still incomplete.

It is our understanding that compliance with the 24-hour nitrogen oxides (NO<sub>x</sub>) emission limit is already difficult and results in greater emissions of carbon monoxide (CO) and volatile organic compounds (VOC) to avoid NO<sub>x</sub> exceedances. A more thorough discussion of the likely effects of tire introduction through the calciner is needed prior to changing the conditions related to tire use. On the one hand, the tires might produce more of the hydrocarbon radicals that destroy NO<sub>x</sub>. On the other hand, the bulky nature of the fuel can lead to greater VOC and CO emissions, especially at the relatively high usage rate proposed.

According to the information obtained by the Department from LaFarge/Melon Cement in Chile, they will burn 20 percent tires following installation of a tire introduction system identical to the one SAC will install. They expect a decrease in NO<sub>x</sub> emissions and an increase in CO emissions.

It should be possible for SAC to obtain better information from the manufacturer, Cadence, and provide a more detailed assessment of likely effects than heretofore provided. Enclosed is an abstract of the "Environmental Impact Evaluation" (EIE) prepared for Melon. We do not have the entire EIE. Also enclosed is the Valparaiso Regional Environmental Commission's Resolution including conditions applicable to the project. Undoubtedly Melon submitted various technical documents (besides the entire EIE) of the kind we would like to receive in support of the present application.

*"More Protection, Less Process"*

*Printed on recycled paper.*

Mr. Celso Martini, Plant Manager  
Suwannee American Cement  
July 27, 2004  
Page 2 of 2

Similarly, we need additional documentation regarding the flyash project besides the very basic descriptions provided. Until these are provided for the tire and flyash projects, it will be possible to consider only test protocols for trials to conduct the "initial testing for optimization" described in the schedules attached to the submitted response.

To accelerate action on such testing, please submit protocols such as were developed for the kiln inlet tests. We will be happy to discuss with SAC the minimum requirements for such a test protocol.

We requested to know how the clinker production is measured and used in the denominator of the pound per ton emission limits. SAC described the methodology in a manner that is totally dependent on preheater feed and proposed the removal of the requirement that clinker production shall be directly measured independently of preheater feed. The subsequent July 9<sup>th</sup> letter application made this a formal request.

As mentioned above, that request needs to be sealed prior to review by the Department. We note that additional justification will be required as it has not been demonstrated to the Department that direct measurement is not required. At the very least, we will need to consult with the supplier to get a better idea of the accuracy and precision of such direct measurement compared with the accuracy and precision of the method used by SAC.

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. Although we noted this requirement in our request for additional information, the response did not include the required certification. SAC will need to abide by that requirement on future submittals.

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. A. Linero, P.E.  
Program Administrator  
South Permitting Section

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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee  <i>P. Foster</i></p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent <input type="checkbox"/> Addressee  <i>P. Foster</i></p> <p>C. Date of Delivery  <i>8-2-04</i></p>
<p>1. Article Addressed to:          Mr. Celso Martini, Plant Manager          Suwannee American Cement          Post Office Box 410          Branford, Florida 32008</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input 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. Article Number          (Transfer from service label) 7000 2870 0000 7027 9638</p>	

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)*

Mr. Celso Martini, Plant Manager

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$</b>	

Sent To  
 Mr. Celso Martini, Plant Manager  
 Street, Apt. No., or PO Box No.  
 Post Office Box 410  
 City, State, ZIP+4  
 Branford, Florida 32008

PS Form 3800, May 2000 See Reverse for Instructions

7000 2870 0000 7027 9638