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# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

May 25, 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 reviewed your request 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 Rule 62-4.080, F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation. Similarly, per Rule 62-4.070, F.A.C., a permit (including modifications) shall be issued to the applicant upon such conditions as the Department may direct, only if the applicant affirmatively provides the Department with reasonable assurance based on plans, test results, installation of pollution control equipment, or other information, that the construction, expansion, modification, operation, or activity of the installation will not discharge, emit, or cause pollution in contravention of Department standards or rules.

We require submittal of the following additional information in order to process your application. Basis is **Rule 62-4.055(1), F.A.C.**

1. Identify each activity including estimated start and finish dates that will be conducted including additional construction, startup and shakedown, performance and emission compliance testing, submittal of Title V Operation Permit application, etc. Basis is **Rule 62-212.400(5)(h)2., F.A.C.** – Permit Application Information Required – “A detailed schedule for construction of the facility.”
2. Describe how the proposed tire derived fuel system will be operated to insure compliance with the NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC permit limitations. **Rules 62-4.070 and 62-212.400, F.A.C. and Permit 1210465-001-AC.**
3. Please advise whether introduction of tires near the kiln inlet will cause or exacerbate coating and plugging problems near the kiln inlet. **Rule 62-4.070, F.A.C.**

*“More Protection, Less Process”*

*Printed on recycled paper.*

4. Please provide an assessment from the tire derived fuel (TDF) system supplier (Cadence) or from the kiln manufacturer (Polysius) whether the existing calcination system can actually accommodate a project to use 40 percent TDF. Please provide examples where this has been accomplished for a preheater/calcliner kiln. **Rule 62-4.070, F.A.C.**
5. Describe how accounting or weighing of raw materials and fuel will be conducted for the TDF system and the flyash injection system to insure that they remain within the permitted limits. For example, how will you determine the amount of steel as raw material from tires? How will you determine the amount of fuel available from any high carbon flyash. **Rule 62-4.070, F.A.C. and Permit 1210465-001-AC.**
6. Describe possible changes in the power plant flyash received as a result of the ability to process higher carbon flyash by injection into the calciner. Please assess the likelihood of increased mercury emissions. **Rule 62-4.070, F.A.C.**
7. Permit Section III, Condition 13 requires that "the total mass of mercury compounds introduced into the pyroprocessing system, expressed as Hg, in raw mill feed and fuels shall not exceed 97 pounds per consecutive 12-month period." Describe changes to mercury sampling protocols and to the mentioned language to insure that all materials and fuels entering the pyroprocessing system continue to be counted towards compliance with the 97 pound per year limitation. **Rule 62-4.070, F.A.C. and Permit 1210465-001-AC.**
8. Please advise exactly the manner by which emissions are accurately calculated in terms of pounds per ton (lb/ton) of clinker and by which the clinker production limit is met in terms of tons per hour. The concentrations are measured directly together with flow rates. In order to most accurately calculate lb/ton clinker values, Permit Section III, Condition 24, requires that "the clinker production rate shall be directly measured independent of preheater feed. The owner or operator shall make and maintain records of the production of portland cement in units of tons per consecutive 12-month period." Clarification of the actual procedure used is required. **Rule 62-4.070, F.A.C. and Permit 1210465-001-AC.**

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. A. Linero, Program Administrator  
South Permitting Section

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

**Adams, Patty**

---

**From:** Linero, Alvaro  
**Sent:** Thursday, April 29, 2004 9:29 AM  
**To:** 'Chuck Yagel'  
**Subject:** RE: Probable Excursion

Thanks Chuck.

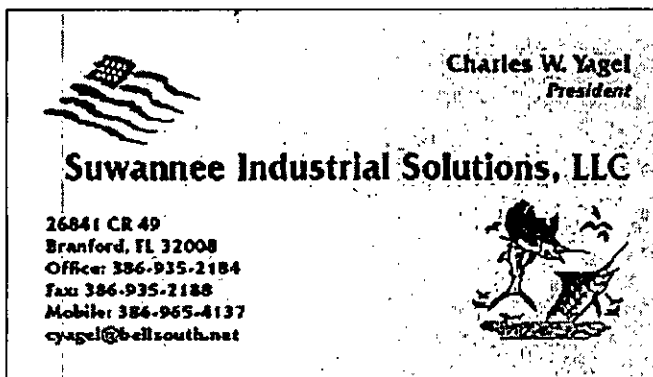
I don't know if there is a CEMS monitor on the finish mill stacks. I referred the matter to our district office who are responsible for compliance.

By the way, we received an application for some air construction permit changes. We sent a hardcopy of the application to you as you requested. We included your name on the list of recipients on Department actions for this request.

Thank you. Al Linero.

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

**From:** Chuck Yagel [mailto:cyagel@bellsouth.net]  
**Sent:** Thursday, April 29, 2004 9:19 AM  
**To:** Linero, Alvaro  
**Subject:** Probable Excursion



Good Morning, Al:

Please check Suwannee American Cement's emissions for Emissions Unit 006 today 29 April, 2004 at 08:30

One of the Finish mill stacks was emitting a significant visible plume which was being carried downwind over and onto my property.

4/29/2004

As you know, these stacks are monitored by CEMS opacity monitors. As such, it should be no difficulty to check the performance to show the probability of broken bag(s) in one of the baghouses.

As soon as I noticed this problem, I notified SAC control.

Thanks in advance

Chuck Yagel

SUWANNEE AMERICAN CEMENT MAILING LIST

Mr. Jim Stevenson  
DEP  
Ecosystem Management

Frank Darabi, P.E.  
President  
Darabi & Assoc., Inc.  
730 NE Waldo Rd., Bldg. A  
Gainesville, FL 32641

Mr. Tom Workman  
Florida Park Service  
District 2 Administration  
4801 SE 17 Street  
Gainesville, FL 32641-9213  
(352) 955-2135  
sc 625-2135  
fax (352) 955-2139

Mr. Mark Latch  
DEP  
Division of Recreation and Parks

Ms. December McSherry  
P O Box 679  
Archer, FL 32618

Mr. Svenn Lindskold  
Save our Suwannee  
Post Office Box 669  
Bell, Florida 32619

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

Mr. Dave Bruderly  
1826 NW 57th Terrace  
Gainesville, Florida 32605

Mr. Chris Bird  
Director of Alachua Co. Dept. of Environmental Regulation  
~~226 South Main Street~~  
Gainesville, Florida ~~32605~~

*201 SE 2nd Ave, Ste. 201  
32601*

Mr. John Mousa  
Alachua Co. Dept. of Environmental Regulation  
226 South Main Street  
Gainesville, Florida 32601

Ms. Penny Wheat, Chair  
Alachua Co. Board of Co. Commissioners  
P O Box 2877  
Gainesville, FL 32602

Mr. J. Calvin Gaddy  
P O Box 147  
St. James City, FL 33956

Ms. Patrice Boyes, Esq.  
Boyes & Associates, PA  
P O Box 1424  
Gainesville, FL 32602

Ms. Kathy Cantwell  
1701 SW 117 St.  
Gainesville, FL, 32607  
(Conservation chair, Suwannee/St. John's Sierra club)

Mr. Ralph Ashodian  
Route 2, Box 5751  
Santa Fe Road  
Fort White, FL 32038

Mr. Craig Pittman  
St. Petersburg Times  
PO Box 1121  
St. Petersburg, FL 33731  
Fax 727-893-8675  
727-893-8530

Ms. Virginia A. Seacrist  
Sisotter@gator.net  
1029 NW 39th Drive  
Gainesville, FL 32605

Dr. R.A. (Bob) and Lynn Milner  
medjob@job4u.com  
716 Stewart St.  
Englewood FL 34223

Ms. Linda Pollini  
arttek@gate.net  
P.O. Box 423  
Archer, FL 32618

Helen Beaty  
4306 NW 20th Drive  
Gainesville, FL 32605

1301 Maymont Dr. or 1/29/03  
Murfreesboro, TN  
37138 - 2316

Bessie Robinson  
~~1995 Georgia Circle, South~~  
~~Clearwater, FL 33760~~

PO Box 10538  
St. Pete, FL  
33793-0538  
or 4/28/03

0499 269E 1000 02E0 1002

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- 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)*

7001 0320 0001 3692 6648

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

X *Melida Brown*  Agent  
 Addressee

**B. Received by (Printed Name)**

*Melida Brown*

**C. Date of Delivery**

*6-1-04*

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

**3. Service Type**

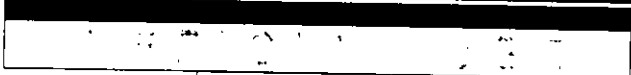
- Certified Mail  Express Mail
- Registered  Return Receipt for Merchandise
- Insured Mail  C.O.D.

**4. Restricted Delivery? (Extra Fee)**

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**U.S. Postal Service**  
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$</b>

Postmark  
Here

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

See reverse for instructions