

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Suwannee American Cement, L.L.C.
Branford Cement Plant
5117 US Highway 27
Branford, FL 32008

Project No. 1210465-015-AC
Branford Cement Plant
Kiln Line No. 1 System
Temporary Hydrated Lime Testing
Suwannee County, Florida

Authorized Representative:
Tom Messer, Plant Manager

Enclosed is Final Air Permit No. 1210465-015-AC, which authorizes a temporary evaluation period to: process raw materials (i.e., limestone, etc.) mined on site with potentially higher sulfur contents; allow stabilization of the sulfur-alkali balance in the kiln system with these materials; evaluate full uncontrolled SO₂ emissions; test other sources of alkali (i.e., feldspar) that could be used to bind sulfur to the cement clinker product to reduce SO₂ emissions; monitor and record changes in the uncontrolled SO₂ emissions; and test the reduction capabilities of the installed hydrated lime system. The permit also authorizes installation of a new limestone bin to feed the finish mill. The existing Branford Cement Plant (SIC No. 3241) is located at 5117 U.S. Highway 27 in Suwannee County, Florida.

This permit is issued pursuant to Chapter 403, Florida Statutes. Any party to this 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 (30) days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

NOTICE OF FINAL PERMIT

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 5/23/06 to the persons listed:

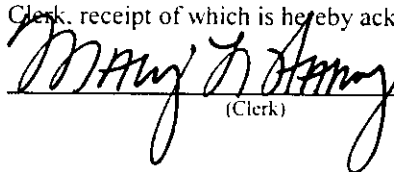
Tom Messer, SAC*
Celso Martini, SAC
Dan Fritz, SAC
Joe Horton, SAC
Larry Sellers, Esq.*
Stephanie Brooks, Brooks and Associates
Frank Darabi, Darabi and Associates*
Chris Kirts, NED
Jim Little, EPA Region 4
John Bunyak, NPS
Chair, Suwannee County BCC
Rob Brinkman, Sierra Club

Jim Stevenson
Tom Workman, DEP
Mark Latch, DEP
December McSherry
Svenn Lindskold
Tom Greenhalgh, Florida Geo.Survey*
Dave Bruderly
Chris Bird, Alachua Co. DER
Chair, Alachua Co. BCC*
J. Calvin Gaddy
Emily Casey
Annette Long, Save Our Suwannee

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

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)

5/23/06

(Date)

FINAL DETERMINATION

PERMITTEE

Suwannee American Cement, L.L.C.
Branford Cement Plant
5117 US Highway 27
Branford, FL 32008

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation, Air Permitting South Program
2600 Blair Stone Road, MS #5505
Tallahassee, Florida, 32399-2400

PROJECT

Project No. 1210465-015-AC
Branford Cement Plant
Temporary Hydrated Lime Testing on Existing Kiln Line No. 1 System

The permit authorizes a temporary evaluation period to: process raw materials (i.e., limestone, etc.) mined on site with potentially higher sulfur contents; allow stabilization of the sulfur-alkali balance in the kiln system with these materials; evaluate full uncontrolled SO₂ emissions; test other sources of alkali (i.e., feldspar) that could be used to bind sulfur to the cement clinker product to reduce SO₂ emissions; monitor and record changes in the uncontrolled SO₂ emissions; and test the reduction capabilities of the installed hydrated lime system. The permit also authorizes installation of a new limestone bin to feed the finish mill. The existing Branford Cement Plant (SIC No. 3241) is located at 5117 US Highway 27 in Suwannee County, Florida.

NOTICE AND PUBLICATION

The Department distributed an "Intent to Issue Permit" package on April 7, 2006. The applicant published the "Public Notice of Intent to Issue" in The Suwannee Democrat on April 21, 2006. The Department received the proof of publication on May 1, 2006. No petitions for administrative hearings or extensions of time to petition for administrative hearings were filed.

COMMENTS

No comments on the Draft Permit were received from the Department's Northeast District Office, or the applicant. The Department received comments from the Suwannee-St. Johns group of the Sierra Club. The following summarizes these comments and the Department's response.

Comment: During the proposed temporary evaluation period, this facility may be operated without SO₂ controls to evaluate the reduction effectiveness of a proposed hydrated lime system. While the average emissions should not increase there could be a temporary substantial increase in SO₂ emissions. Although the Department may judge this to be not significant, the people of the local community may not agree. Response: The hydrated lime injection system is an existing control device. Currently, it is not operated at all times, but is used to control periods of elevated SO₂ emissions. The temporary evaluation period will allow the plant to gather emissions data for use in adjusting the control system and providing a quicker response. It will also allow the plant to test other sources of alkali (i.e., feldspar) that might be used to bind sulfur to the cement clinker product to reduce SO₂ emissions. The term "significant" as used in the Technical Evaluation and Preliminary Determinations refers to the PSD significant emission rate of 40 tons per year for sulfur dioxide. If SO₂ emissions increased above this regulatory threshold, the project would be subject to PSD preconstruction review. This is not the case and the project is not considered to be "significant" in terms of PSD review.

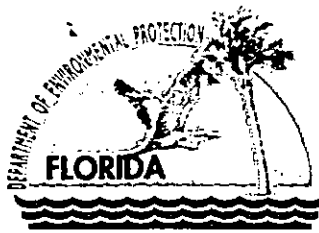
FINAL DETERMINATION

Comment: Introducing more limestone products into the kiln will increase the amount of CO₂ released by this plant. Although CO₂ is not currently a regulated or criteria air pollutant, this does not mean that increased emissions will not have negative effects on the health, safety and welfare of the people. While the installation of this new hydrated lime injection system may seem to be a pollution reduction benefit, it actually is being done to allow for greater levels of production or the use of raw materials with greater amounts of sulfur. The application should be denied due to increased impacts on climate change and because there is no net environmental benefit for the community. Response: It is true that CO₂ is not a regulated air pollutant. Nevertheless, the amount of hydrated lime that will be injected is very small in comparison to the amount of limestone processed by the kiln system. The project will not increase the allowable levels of cement production, but will evaluate the use of raw materials (limestone) containing greater amounts of sulfur and the ability to effectively reduce SO₂ emissions. See also response to above comment.

Comment: Due to increased impacts on climate change and because there is no net environmental benefit, it is requested that a public meeting be held in Suwannee County and that the plant manager or environmental compliance officer attend to address issues of concern to the community. Response: As explained in the response to the comments above, the hydrated lime injection system is already installed and the project will allow its optimization. SO₂ emissions from the temporary project are less than the corresponding PSD significant emissions rate. In addition, CO₂ emissions and climate change are not regulated by the Department's air pollution regulations at this time. For this minor source air construction permit, the Department mailed copies to more than 30 different parties and a Public Notice was published in The Suwannee Democrat. This letter represents the only comment provided. The Department responded to Mr. Brinkman's comments by email on April 25, 2006 and received no further comments. Given the forgoing, the Department will not hold a public meeting on this project.

CONCLUSION

Only minor revisions were made to correct typographical errors. The final action of the Department is to issue the permit with the changes described above.



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

PERMITTEE:

Suwannee American Cement, L.L.C.
Branford Cement Plant
5117 US Highway 27
Branford, FL 32008

Authorized Representative:

Tom Messer, Plant Manager

Air Permit No. 1210465-015-AC Branford Cement Plant Kiln Line No. 1 System Temporary Hydrated Lime Testing Suwannee County, Florida

PROJECT AND LOCATION

This permit authorizes a temporary evaluation period to: process raw materials (i.e., limestone, etc.) mined on site with potentially higher sulfur contents; allow stabilization of the sulfur-alkali balance in the kiln system with these materials; evaluate full uncontrolled SO₂ emissions; test other sources of alkali (i.e., feldspar) that could be used to bind sulfur to the cement clinker product to reduce SO₂ emissions; monitor and record changes in the uncontrolled SO₂ emissions; and test the reduction capabilities of the installed hydrated lime system. The permit also authorizes installation of a new limestone bin to feed the finish mill. The existing Branford Cement Plant (SIC No. 3241) is located at 5117 US Highway 27 in Suwannee County, Florida. The UTM coordinates are: Zone 17; 321.4 km E and 3315.9 km N.

STATEMENT OF BASIS

This minor source air pollution 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 perform the work in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department.

CONTENTS

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Units Specific Conditions
- Section 4. Appendices

Michael G. Cooke, Director
Division of Air Resource Management

(Effective Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

The existing facility consists of a portland cement manufacturing plant, the associated quarry, and raw material and cement handling operations. The plant combines raw materials and utilizes a preheater/calcliner kiln system with inline mill to produce cement clinker. The clinker is milled and combined with gypsum to produce portland cement. The existing plant has a capacity of 210 tons per hour of dry preheater feed materials, 120 tons per hour of clinker production, and 150 tons per hour of portland cement production. Annual production is limited to the following 12-month rolling totals: 1,648,578 tons per year of dry preheater feed materials; 965,425 tons per year of clinker production; and 1,191,360 tons per year of portland cement production.

This permit authorizes a temporary evaluation period to: process raw materials (i.e., limestone, etc.) mined on site with potentially higher sulfur contents; allow stabilization of the sulfur-alkali balance in the kiln system with these materials; evaluate full uncontrolled SO₂ emissions; test other sources of alkali (i.e., feldspar) that could be used to bind sulfur to the cement clinker product to reduce SO₂ emissions; monitor and record changes in the uncontrolled SO₂ emissions; and test the reduction capabilities of the installed hydrated lime system. The permit also authorizes installation of a new limestone bin to feed the finish mill. The project affects the following emissions unit.

ID	Emission Unit Description
004	Existing Kiln No. 1 pyroprocessing system
xxx	New limestone bin to feed finish mill

REGULATORY CLASSIFICATION

Title III: The cement plant is a major source of hazardous air pollutants (HAP).

Title IV: The cement plant operates no units subject to the acid rain provisions of the Clean Air Act.

Title V: The cement plant is a Title V major source in accordance with Chapter 213, F.A.C.

PSD: The cement plant is a PSD-major facility in accordance with Rule 62-212.400, F.A.C. The proposed project is a major PSD modification.

NSPS: Portions of the cement plant are subject to the following New Source Performance Standards (NSPS) in 40 CFR 60: Subpart A (General Provisions); Subpart F (Portland Cement Plants); Subpart Y (Coal Preparation Plants); and Subpart OOO (Non Metallic Mineral Processing).

NESHAP: Portions of the cement plant are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 63: Subpart A (General Provisions); and Subpart LLL (Portland Cement Manufacturing Industry).

State Rules: The cement plant is subject to state Rule 62-296.407, F.A.C. (Portland Cement Plants).

RELEVANT DOCUMENTS

The permit application and the Department's Technical Evaluation and Preliminary Determination are not a part of this permit; however, the information is specifically related to this permitting action and is on file with the Department.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: All documents related to PSD applications for permits to construct or modify emissions units shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to construct minor sources of air pollution or to operate the facility shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as part of this permit: Appendix A (Citation Formats), Appendix B (General Conditions), and Appendix C (Common Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403 of the Florida Statutes (F.S.); Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297 of the Florida Administrative Code (F.A.C.). The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. 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: The permittee shall notify the Compliance Authority upon commencement of construction. 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. Title V Permit: This permit authorizes the applicant to conduct the proposed work for the specified temporary testing period. The purpose of the project is to gather information and provide a report of the findings. A revision of the Title V operation permit for this temporary project is not necessary. The addition of the new limestone bin imposes no new standards. This equipment shall be added to the Title V permit at the next re-opening (revision) for some other cause. [Rule 62-4.070, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Kiln No. 1 System

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
004	Existing Kiln No. 1 pyroprocessing system

PERFORMANCE RESTRICTIONS

1. Temporary Evaluation Period: The permittee is authorized for a temporary evaluation period to: process raw materials (i.e., limestone, etc.) mined on site with potentially higher sulfur contents; allow stabilization of the sulfur-alkali balance in the kiln system with these materials; evaluate full uncontrolled SO₂ emissions; test other sources of alkali (i.e., feldspar) that could be used to bind sulfur to the cement clinker product to reduce SO₂ emissions; monitor and record changes in the uncontrolled SO₂ emissions; and test the reduction capabilities of the installed hydrated lime system.
 - a. Authorization to conduct the evaluation shall expire 180 days after the effective date on the placard page of this permit. At least seven calendar days prior to beginning the test evaluation, the permittee shall provide the Compliance Authority with written notification (letter, fax or email) of the preliminary schedule including the beginning and ending dates for the project. The schedule shall be updated as necessary. The temporary evaluation period shall not exceed 60 consecutive days. Within at least three working days of finishing the test evaluation, the permittee shall provide written notification (letter, fax or email) that the temporary test evaluation has been completed.
 - b. Except for the temporary requirements specified in this permit, the permittee shall continue to comply with all conditions specified in the current Title V air operation permit and other valid permits. The permittee shall cease any activity related to the temporary evaluation project as soon as possible that is not in accordance with applicable permit requirements. The permittee shall immediately notify the Compliance Authority (phone, fax, or email) of any non-compliance issue. The temporary evaluation project shall not resume until appropriate actions have been taken to correct the problem. [Rules 62-4.070(3), 62-4.210(2) and 62-210.300(1), F.A.C.]

EMISSIONS STANDARDS

2. Emissions Standards: Except for sulfur dioxide emissions as specified below, the permittee shall continue to comply with the emissions standards specified in the Title V air operation permit. During the test evaluation period, the following temporary sulfur dioxide emissions standards shall apply in lieu of the current standard of 0.20 lb/ton of clinker (24.0 lb/hour) based on a 3-hour rolling average.
 - a. 24-Hour Average: For each day during the test evaluation period, emissions of sulfur dioxide shall not exceed 60.0 lb/hour based on a 24-hour daily block average of all available, valid data collected by the required SO₂ Continuous Emissions Monitoring System. A 24-hour daily block average covers midnight-to-midnight operation. *{Permitting Note: This is equivalent to 0.50 lb/ton of clinker.}*
 - b. 30-Day Average: During the test evaluation period, emissions of sulfur dioxide shall not exceed 0.20 lb/ton of clinker (24.0 lb/hour) based on a 30-day rolling average of data collected by the required SO₂ Continuous Emissions Monitoring System. Each 30-day rolling average shall be computed from all available, valid data collected during the 30-day operating period. The 30-day averages shall be rolled until the last day of the test evaluation period is used in such a determination. The last day of the test evaluation period shall be used in only one such determination.

After completion of the test evaluation period, the standard for sulfur dioxide emissions shall revert back to the current standard of 0.20 lb/ton of clinker (24.0 lb/hour) based on a 3-hour rolling average. [Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. Kiln No. 1 System

RECORDS AND REPORTS

3. Operational Data: The permittee shall continue to monitor and record operational and emissions data as required in the current Title V air operation permit. In addition, the permittee shall maintain records necessary to demonstrate compliance with the temporary SO₂ emissions standards specified above. [Rule 62-4.070(3), F.A.C.]
4. Test Report: Within 60 days of completing the test evaluation period, the permittee shall submit a report to the Department summarizing the following for the test period: summary of testing; sulfur-alkali balance achieved; impact on sulfur cycle; SO₂ CEMS data collected; sulfur content of raw materials used; sulfur form of raw materials (pyretic vs. sulfate compounds); alkali testing and effect on trapping sulfur in clinker; SO₂ control effectiveness with hydrated lime system; and recommendations for sulfur balance control with existing limits and averaging times. [Rule 62-297.310(8), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

B. New Limestone Bin to Feed Finish Mill

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
xxx	New limestone bin to feed finish mill

EQUIPMENT

1. Limestone Bin: The permittee is authorized to install a new limestone bin (L09-02) for the storage of wet limestone. The new bin will be approximately 700 tons in size, approximately the same dimensions as the existing gypsum bin, and will be located directly adjacent to the existing gypsum bin. The new bin will allow limestone to replace some of the natural gypsum normally used in the finish mill when grinding of clinker into cement. The limestone will substitute for gypsum in a similar ratio. Existing transfer points currently used to introduce gypsum will also be used to add limestone. There will no change in the throughput rates for the existing transfer points. Instead, the throughputs will be split between the gypsum and limestone. Additionally, there will be no increase in cement production above currently permitted levels. [Design; Application No. 1210465-015-AC]

RECORDS

2. Notification: With 30 days of completing installation of the new limestone bin, the permittee shall provide the Compliance Authority a written notification that construction is complete. [Rule 62-4.070(3), F.A.C.]

Filename: Final Permit - 1210465-015-AC

SECTION 4. APPENDICES
CONTENTS

- Appendix A. Citation Formats
- Appendix B. General Conditions
- Appendix C. Common Conditions

SECTION 4. APPENDIX A

CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001" identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX B
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

SECTION 4. APPENDIX B
GENERAL CONDITIONS

Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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 (not applicable to project);
 - b. Determination of Prevention of Significant Deterioration (not applicable to project); and
 - c. Compliance with New Source Performance Standards (not applicable to project).
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.

SECTION 4. APPENDIX C
COMMON CONDITIONS

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

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

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.

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

To
 Sen Ms. Patrice Boyes, Esq.
 Boys & Associates, PA
 Post Office Box 358584
 Gainesville, Florida 32635-8584

1. Article Addressed to:

 Ms. Patrice Boyes, Esq.
 Boys & Associates, PA
 Post Office Box 358584
 Gainesville, Florida 32635-8584

2. Article Number
 (Transfer from service label) **7000 1670 0013 3110 1694**

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
[Signature]

B. Received by (Printed Name) *Samantha Vloedman* C. Date of Delivery *6/6/06*

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) Yes

7000 1670 0013 3109 8413

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

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.

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

To
 Sen Mr. Tom Greenhalgh, P.G.
 Florida Geological Survey
 Hydrogeology Section
 903 West Tennessee Street, MS#721
 Tallahassee, Florida 32304-7700

1. Article Addressed to:

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

2. Article Number
 (Transfer from service label) **7000 1670 0013 3109 8413**

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
[Signature]

B. Received by (Printed Name) *[Name]* C. Date of Delivery *5-31-06*

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) Yes

7000 1670 0013 3110 1724

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

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.

COMPLETE THIS SECTION ON DELIVERY

A. Signature  Agent
 Addressee

B. Received by (Printed Name) CHARLES W. YAGEL C. Date of Delivery 6/8/06

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

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

Total P.
 Sent To Mr. Charles W. Yagel, President
Suwannee Industrial Solution, LLC
 Street, At 26841 CR 49
 City, State Branford, Florida 32008

1. Article Addressed to:

 Mr. Charles W. Yagel, President
 Suwannee Industrial Solution, LLC
 26841 CR 49
 Branford, Florida 32008

2. Article Number (Transfer from service label) 7000 1670 0013 3110 1724

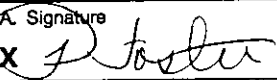
7000 1670 0013 3110 1731

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

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.

COMPLETE THIS SECTION ON DELIVERY

A. Signature  Agent
 Addressee

B. Received by (Printed Name) P. Foster C. Date of Delivery 5/25/06

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

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

To Mr. Tom Messer, Plant Manager
Suwannee American Cement, LLC
 Street Post Office Box 410
 City Branford, Florida 32008

1. Article Addressed to:

 Mr. Tom Messer, Plant Manager
 Suwannee American Cement, LLC
 Post Office Box 410
 Branford, Florida 32008

2. Article Number (Transfer from service label) 7000 1670 0013 3110 1731


7000 1670 0013 3110 0734

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

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.

COMPLETE THIS SECTION ON DELIVERY

A. Signature  Agent
 Addressee

B. Received by (Printed Name) P. Foster C. Date of Delivery 5/25/06

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

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

To Mr. Celso Martini
Suwannee American Cement, LLC
 Street Post Office Box 410
 City Branford, Florida 32008

1. Article Addressed to:

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

2. Article Number (Transfer from service label) 7000 1670 0013 3110 0734

7000 0670 0213 3110 1717

U.S. Postal Service CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Tot	
Sent:	Mr. Larry Sellers, Jr., Esq. Holland and Knight, LLP Post Office Drawer 810 Tallahassee, Florida 32301
Street:	
City:	

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. Larry Sellers, Jr., Esq.
Holland and Knight, LLP
Post Office Drawer 810
Tallahassee, Florida 32301

2. Article Number
(Transfer from service label) **7000 1670 0013 3110 1717**

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
 X *[Signature]*

B. Received by (Printed Name) *Ch. P. Madden* C. Date of Delivery *MAR 2 2004*

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) Yes

PS Form 3800, May 2000 See Reverse

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

0017 0213 3110 1717

U.S. Postal Service CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Tot	
Sent:	Ms. Cynthia Moore Chestnut Alachua County Board of County Commissioners Post Office Box 2877 Gainesville, Florida 32602
Street:	
City:	

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. Cynthia Moore Chestnut
Alachua County Board of County
Commissioners
Post Office Box 2877
Gainesville, Florida 32602

2. Article Number
(Transfer from service label) **7000 1670 0013 3110 1700**

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
 X *[Signature]*

B. Received by (Printed Name) *J. Crow* C. Date of Delivery *5-26-06*

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) Yes

PS Form 3800, May 2000 See Reverse

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

0217 0213 3110 1717

U.S. Postal Service CERTIFIED MAIL RECEIPT

(Domestic Mail Only; No Insurance Coverage)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Tot	
Sent:	Mr. Frank Darabi, P.E. President Darabi & Associates, Inc. 730 NE Waldo Road, Bldg. A Gainesville, Florida 32641
Street:	
City:	

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. Frank Darabi, P.E.
President
Darabi & Associates, Inc.
730 NE Waldo Road, Bldg. A
Gainesville, Florida 32641

2. Article Number
(Transfer from service label) **7000 1670 0013 3110 1670**

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
 X *[Signature]*

B. Received by (Printed Name) *Frank Darabi* C. Date of Delivery *5-25-06*

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) Yes

PS Form 3800, May 2000 See Reverse

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540