


Florida Department of Environmental Protection

Memorandum

TO: Trina Vielhauer, BAR Chief
FROM: Jeff Koerner, Air Permitting North Program 
DATE: April 5, 2006
SUBJECT: Project No. 1210465-015-AC
Branford Cement Plant
Kiln Line No. 1 System
Temporary Hydrated Lime Testing

Attached for your review are the following items:

- Intent to Issue Permit and Public Notice Package;
- Technical Evaluation and Preliminary Determination;
- Draft Permit; and
- PE Certification

The draft 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 draft permit also authorizes installation of a new limestone bin to feed the finish mill. The new equipment will be installed at the existing Branford Cement Plant (SIC No. 3241), which is located at 5117 US Highway 27 in Suwannee County, Florida.

The Technical Evaluation and Preliminary Determination provides a detailed description of the project, rule applicability, and emissions standards. The P.E. certification briefly summarizes the proposed project. Day #90 is April 17, 2006. I recommend your approval of the attached Draft Permit for this project.

Attachments



Department of Environmental Protection

Jeb Bush
Governor

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

Colleen M. Castille
Secretary

April 6, 2006

Tom Messer, Plant Manager
Suwannee American Cement, LLC
Branford Cement Plant
5117 US Highway 27
Branford, FL 32008

Re: Air Construction Permit No. 1210465-015-AC
Suwannee American Cement - Branford Cement Plant
Temporary Hydrated Lime Testing

Dear Mr. Messer:

The Department has reviewed your request 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; and test the reduction capabilities of the installed hydrated lime system. You also requested authorization to permanently install a new limestone bin to feed the finish mill. The work will be performed at the existing Branford Cement Plant, which is located at 5117 US Highway 27 in Suwannee County, Florida. Enclosed are the following documents: "Technical Evaluation and Preliminary Determination", "Draft Permit", "Written Notice of Intent to Issue Air Permit", and "Public Notice of Intent to Issue Air Permit".

The "Technical Evaluation and Preliminary Determination" summarizes the Permitting Authority's technical review of the application and provides the rationale for making the preliminary determination to issue a Draft Permit. The proposed "Draft Permit" includes the specific conditions that regulate the emissions units covered by the proposed project. The "Written Notice of Intent to Issue Air Permit" provides important information regarding: the Permitting Authority's intent to issue an air permit for the proposed project; the requirements for publishing a Public Notice of the Permitting Authority's intent to issue an air permit; the procedures for submitting comments on the Draft Permit; the process for filing a petition for an administrative hearing; and the availability of mediation. The "Public Notice of Intent to Issue Air Permit" is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact the Project Engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

A handwritten signature in black ink, appearing to read "Trina Vielhauer", is positioned above the typed name.

Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

"More Protection, Less Process"

Printed on recycled paper.

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

*In the Matter of an
Application for Air Permit by:*

Suwannee American Cement, LLC
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

Facility Location: Suwannee American Cement, LLC operates the existing Branford Cement Plant, which is located at 5117 US Highway 27 in Suwannee County, Florida.

Project: The applicant proposes a temporary evaluation period to: 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; and the test the reduction capabilities of the installed hydrated lime system. The applicant also proposes to add a new limestone bin to the feed finish mill. Details of the project are provided in the in the application and the enclosed "Technical Evaluation and Preliminary Determination".

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed "Public Notice of Intent to Issue Air Permit" (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven (7) days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of the Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Suwannee American Cement
Branford Cement Plant

Air Permit No. 1210465-015-AC
Temporary Hydrated Lime Testing

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen (14) days of publication of the attached Public Notice or within fourteen (14) days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief
Bureau of Air Regulation

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this "Written Notice of Intent to Issue Air Permit" package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 4/7/06 to the persons listed below.

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 Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Paulina J. Friday (Clerk) 4/7/06 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection

Draft Air Permit No. 1210465-015-AC
Suwannee American Cement - Branford Cement Plant
Temporary Hydrated Lime Testing
Suwannee County, Florida

Applicant: The applicant for this project is Suwannee American Cement, LLC. The applicant's authorized representative and mailing address is: Tom Messer, Plant Manager, Branford Cement Plant, 5117 US Highway 27, Branford, FL, 32008.

Facility Location: Suwannee American Cement, LLC operates the existing Branford Cement Plant, which is located at 5117 US Highway 27 in Suwannee County, Florida.

Project: The applicant proposes 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. During the 60-day evaluation test period, the applicant requests that the permitted sulfur dioxide (SO₂) emission rate of 0.20 lb/ton of clinker be temporarily revised to a 30-day rolling average. This will provide the flexibility necessary to determine uncontrolled emission levels, test the effects of feldspar and other alkalis to reduce SO₂ emissions, evaluate the effectiveness of the existing hydrated lime injection system, and observe any operational difficulties. Continuous emissions monitoring data will be used to ensure compliance. The project will not result in significant increases of SO₂ emissions. The applicant also proposes to install a new limestone bin to feed the finish mill. The limestone would displace gypsum, which is typically used in the finish mill. Fugitive emissions from the transport of limestone would be offset by an equivalent amount from the transport of gypsum resulting in no expected emissions increases of particulate matter. The project is not subject to preconstruction review for the Prevention of Significant Deterioration, Rule 62-212.400, F.A.C.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of fourteen (14) days from the date of publication of this Public Notice. Written comments must be provided to the Permitting Authority at the above address. Any written comments filed will be made available for public inspection. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set

(Public Notice to be Published in the Newspaper)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within fourteen (14) days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within fourteen (14) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of how and when the petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

**TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION**

PROJECT

Draft Air Construction Permit No. 1210465-015-AC
Temporary Evaluation Period for Hydrated Lime Injection System
and
Authorization to Install a New Finish Mill Limestone Bin

COUNTY

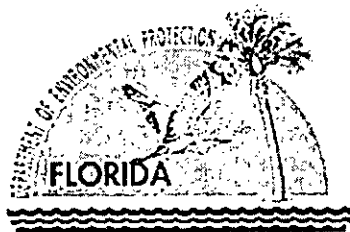
Suwannee County, Florida

APPLICANT

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 North Program



April 5, 2006

{Filename: TEPD - 1210465-015-AC}

1. GENERAL PROJECT INFORMATION

Facility Description and Location

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. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to a National Ambient Air Quality Standard (NAAQS).

The existing facility consists of a portland cement manufacturing plant (3241), 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.

Fuel authorized for the pyroprocessing system includes natural gas, coal, petroleum coke, and whole or chipped tires. The plant also operates a coal processing operation to crush coal and petroleum coke with a monthly processing capacity of 13,360 tons of coal and/or petroleum coke, combined. For the existing kiln system, the plant uses Selective Non-Catalytic Reduction (SNCR) to control NO_x emissions, a baghouse system to remove particulate matter emissions, and a hydrated lime injection system to reduce sulfur dioxide emissions. For the existing kiln system, the plant continuously monitors opacity and emissions of nitrogen oxides, sulfur dioxide, and total hydrocarbons.

Regulatory Categories

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 not subject to PSD preconstruction review.

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).

Project Description

The applicant requests a minor source air construction permit to authorize the following activities.

- The applicant requests authorization of a temporary test period to evaluate uncontrolled SO₂ emissions based on the raw materials available at this site and the actual effectiveness of the installed hydrated lime injection system to control these emissions. The test period would cover a two month period during which the plant would have the flexibility to process raw materials with a higher sulfur content, which could lead to more effective use of the quarry. During the evaluation period, the plant will: 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

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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 current SO₂ emissions standard is 0.20 lb/ton of clinker produced based on a 3-hour rolling average. This averaging period is too short to allow full evaluation of the higher-sulfur raw materials and hydrated lime injection system. In place of the current standard, the applicant requests a temporary SO₂ standard of 0.20 lb/ton of clinker produced based on a 30-day calendar block average during the test period. As a result, there would be no increase in potential SO₂ emissions.

- The applicant requests authorization to install a new limestone bin (L09-02) for the storage of wet limestone for use in the cement grinding process. This request is incorporated into the application for the hydrated lime testing. 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 bin will be approximately 700 tons in size and the same dimensions as the current gypsum bin. The bin will be located directly adjacent to the existing gypsum bin.

Processing Schedule

- 12/02/05 Received application requesting a temporary period to evaluate the hydrated lime injection system.
01/18/06 Received request to add a new limestone bin to the finish mill operation; complete.

2. APPLICABLE REGULATIONS

State Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the Florida Administrative Code.

<u>Chapter</u>	<u>Description</u>
62-4	Permitting Requirements
62-204	Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference
62-210	Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions, and Forms
62-212	Preconstruction Review, PSD Review and BACT, and Non-attainment Area Review and LAER
62-213	Title V Air Operation Permits for Major Sources of Air Pollution
62-296	Emission Limiting Standards
62-297	Test Methods and Procedures, Continuous Monitoring Specifications, and Alternate Sampling Procedures

General PSD Applicability

The Department regulates major air pollution sources in accordance with Florida's Prevention of Significant Deterioration (PSD) program, as approved by the EPA in Florida's State Implementation Plan and defined in Rule 62-212.400, F.A.C. A PSD review is required in areas currently in attainment with the state and federal Ambient Air Quality Standards (AAQS) or areas designated as "unclassifiable" for a given pollutant. A new facility is considered "major" with respect to PSD if it emits or has the potential to emit: 250 tons per year or more of any regulated air pollutant, or 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the 28 PSD Major Facility Categories (Table 62-212.400-1, F.A.C.), or 5 tons per year of lead.

For new projects at PSD-major sources, each regulated pollutant is reviewed for PSD applicability based on emissions thresholds known as the Significant Emission Rates listed in Table 62-212.400-2, F.A.C. Pollutant emissions from the project exceeding these rates are considered "significant" and the applicant must employ the Best Available Control Technology (BACT) to minimize emissions of each such pollutant and evaluate the air

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

quality impacts. Although a facility may be "major" with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

Temporary Hydrated Lime Testing

Based on Annual Operating Reports from the Department's ARMS database, actual annual SO₂ emissions are reported as 10.6 tons per year (2003) and 3.3 tons per year (2004). This information is based on actual data collected from the continuous emissions monitoring system (CEMS). The two-year average is approximately 7 tons per year or 0.6 tons per month. Therefore, past actual SO₂ emissions are estimated to be 1.2 tons for the temporary 60-day test period proposed.

During the temporary test period, actual short-term SO₂ emissions may increase. However, average SO₂ emissions over the test period will not exceed the permit allowable emission rate of 0.20 lb/ton of clinker (24.0 lb/hour) based on a 30-day rolling average of CEMS data. Therefore, the potential SO₂ emissions would be:

$$\text{SO}_2 = (24 \text{ lb SO}_2/\text{hour})(24 \text{ hour/day}) (60 \text{ days/test}) (\text{tons}/2000 \text{ lb}) = 17.3 \text{ tons/test}$$

Therefore, the project results in a maximum potential emissions increase of 16.1 tons during the test period.

New Limestone Bin

The applicant plans to use limestone in approximately 10% of the cement produced, which is approximately 119,136 tons of portland cement per year. 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 be 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.

The limestone throughput for the new bin would be approximately 4000 to 8000 tons per year. Fugitive emissions from the transport of limestone would be offset by an equivalent amount from the transport of gypsum. The use of limestone will actually reduce the truck trips to and from the site because the limestone will be transported from the onsite quarry via enclosed conveyors and not trucks as is the case with the gypsum. Due to the relatively large particle sizes and high moisture content (15%), potential emissions from the proposed use of the limestone bin are estimated to be very low (0.00005 tons per year of PM and 0.00002 ton per year of PM₁₀). However, limestone will actually displace gypsum in the process and there is no predicted potential emissions increase from the project.

Conclusion on PSD Applicability

The existing cement plant belongs to one of the 28 PSD Major Facility Categories identified in Table 62-212.400-1, F.A.C. Potential emissions of at least one criteria pollutant exceed 100 tons per year. Therefore, the existing plant is a PSD-major facility. The temporary hydrated lime test project will result in a potential SO₂ emissions increase of 16.1 tons, which is less than the PSD-significant emission rate of 40 tons per year. The addition of a new limestone bin is not expected to result in any emissions increase of particulate matter. Therefore, the project is not subject to PSD preconstruction review.

3. DRAFT PERMIT REQUIREMENTS

In addition to authorizing construction of the new limestone bin, the draft permit includes permit conditions that require the following.

- Temporary Evaluation Period: This is a temporary project to evaluate the effectiveness of the installed hydrated lime injection system. 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 written notification of the preliminary schedule including the beginning and ending dates for the project. The temporary evaluation period shall not exceed 60

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

consecutive days. Within at least three working days of ending the test evaluation, the permittee shall provide written notification (fax, email, or letter) that the temporary test evaluation has been completed. 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. [Rules 62-4.070(3), 62-4.210(2) and 62-210.300(1), F.A.C.]

- **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 and other valid permits. 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. 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.]

A review of the previous air quality modeling analysis indicates that this level of temporary emissions would remain below the significant impact level for SO₂ emissions. No further modeling analysis is required.

- **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.]
- **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.]

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT

PERMITTEE:

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

Authorized Representative:

Tom Messer, Plant Manager

Project 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

(DRAFT)

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: Draft 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.]

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

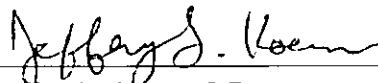
Draft Air Permit No. 1210465-015-AC
Branford Cement Plant
Kiln Line No. 1 System
Temporary Hydrated Lime Testing
Suwannee County, Florida

PROJECT DESCRIPTION

The applicant proposes 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. During the 60-day evaluation test period, the applicant requests that the permitted sulfur dioxide (SO₂) emission rate of 0.20 lb/ton of clinker be temporarily revised to a 30-day rolling average. This will provide the flexibility necessary to: determine uncontrolled emission levels; test the effects of feldspar and other alkalis to reduce SO₂ emissions; evaluate the effectiveness of the existing hydrated lime injection system; and observe any operational difficulties. Continuous emissions monitoring data will be used to ensure compliance.

The applicant also proposes to install a new a new limestone bin to feed the finish mill. The limestone would displace gypsum, which is typically used in the finish mill. Fugitive emissions from the transport of limestone would be offset by an equivalent amount from the transport of gypsum resulting in no expected emissions increases of particulate matter. The project is not subject to preconstruction review for the Prevention of Significant Deterioration, Rule 62-212.400, F.A.C.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



Jeffery F. Koerner, P.E.
Registration Number: 49441

4-5-06

(Date)

7005 1160 0004 3034 4028

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

For delivery information visit our website at www.usps.com

Mr. Frank Darabi, P.E., President

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

Sent To
Mr. Frank Darabi, P.E., President
 Street, Apt. No., or PO Box No. **730 NE Waldo Road, Bldg. A**
 City, State, ZIP+4 **Gainesville, Florida 32641**

PS Form 3800, June 2002 See Reverse

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) **7005 1160 0004 3034 4028**

PS Form 3811, February 2004 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature **X** *Frank Darabi* Agent Addressee

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

C. Date of Delivery **4-10-06**

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

3. Service Type
 Certified Mail Express Mail
 Registered Mail Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes No

102595-02-M-1544

7005 1160 0004 3034 4042

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

For delivery information visit our website at www.usps.com

Ms. Cynthia Moore Chestnut, Alachua Co

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

Sent To
Ms. Cynthia Moore Chestnut, Alachua Co
 Street, Apt. No., or PO Box No. **Post Office Box 2877**
 City, State, ZIP+4 **Gainesville, Florida 32602**

PS Form 3800, June 2002 See Reverse

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) **7005 1160 0004 3034 4042**

PS Form 3811, February 2004 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature **X** *Cynthia Moore* Agent Addressee

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

C. Date of Delivery **4-11-06**

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

3. Service Type
 Certified Mail Express Mail
 Registered Mail Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes No

102595-02-44-1540

7005 1160 0004 3034 4035

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

For delivery information visit our website at www.usps.com

Mr. Tom Greenhalgh, P.G.

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

Sent To
Mr. Tom Greenhalgh, P.G.
 Street, Apt. No., or PO Box No. **903 West Tennessee Street, M**
 City, State, ZIP+4 **Tallahassee, Florida 32304-7700**

PS Form 3800, June 2002 See Reverse

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. Tom Greenhalgh, P.G.
 Florida Geological Survey
 Hydrogeology Section
 903 West Tennessee Street, MS#720
 Tallahassee, Florida 32304-7700

2. Article Number (Transfer from service label) **7005 1160 0004 3034 4035**

PS Form 3811, February 2004 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature **X** *Tom Greenhalgh* Agent Addressee

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

C. Date of Delivery **4/10/06**

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

3. Service Type
 Certified Mail Express Mail
 Registered Mail Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes No

102595-02-44-1540

7005 1160 0004 3034 4066

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

For delivery information visit our website at www.usps.com

Mr. Charles W. Yagel, President

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

Sent To
Mr. Charles W. Yagel, President
Street, Apt. No., or PO Box No. 26841 CR 49
City, State, ZIP+4
Branford, Florida 32008

PS Form 3800, June 2002 See Reverse

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.

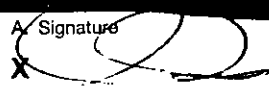
1. Article Addressed to:

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

2. Article Number (Transfer from service label) 7005 1160 0004 3034 4066

PS Form 3811, February 2004 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature  Agent Addressee

B. Received by (Printed Name) CHARLES W. YAGEL C. Date of Delivery 10 APR 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

7005 1160 0004 3034 4004

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

For delivery information visit our website at www.usps.com

Mr. Tom Messer, Plant Manager

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

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

PS Form 3800, June 2002 See Reverse

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.

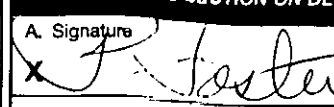
1. Article Addressed to:

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

2. Article Number (Transfer from service label) 7005 1160 0004 3034 4004

PS Form 3811, February 2004 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature  Agent Addressee

B. Received by (Printed Name) T. Messer C. Date of Delivery 4/10/06

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

7005 1160 0004 3034 4059

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

For delivery information visit our website at www.usps.com

Ms. Patrice Boyes, Esq.

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

Sent To
Ms. Patrice Boyes, Esq.
Street, Apt. No., or PO Box No. Post Office Box 358584
City, State, ZIP+4
Gainesville, Florida 32635-8584

PS Form 3800, June 2002 See Reverse

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

2. Article Number (Transfer from service label) 7005 1160 0004 3034 4059

PS Form 3811, February 2004 Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature  Agent Addressee

B. Received by (Printed Name) Patrice Boyes C. Date of Delivery 4/19/06

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

102595-02-M-1540

102595-02-M-1540

102595-02-M-1540

7005 1160 0004 3034 4011

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

For delivery information visit our website at www.usps.com

Mr. Larry Sellers, Jr., Esq.

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

Sent To
Mr. Larry Sellers, Jr., Esq.
Street, Apt. No.,
or PO Box No. Post Office Drawer 810
City, State, ZIP+4
Tallahassee, Florida 32301

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)

7005 1160 0004 3034 4011

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *Chip Madder* Agent
 Addressee

B. Received by (Printed Name) *Chip Madder* C. Date of Delivery *4/11/04*

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