

The Suwannee Democrat

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Published Weekly
Post Office Box 370- Phone 362-1734
Live Oak, Suwannee County, Florida 32064

JAN 23 2006

STATE OF FLORIDA
COUNTY OF SUWANNEE:

BUREAU OF AIR REGULATION

Before the undersigned authority personally appeared

Louise Sheddan

who on oath says that she is
Legal Secretary

of The Suwannee Democrat, a weekly newspaper published at Live Oak in Suwannee County, Florida; that the attached copy of advertisement, being a

NOTICE OF PUBLIC MEETING

in the matter of

PROJECT NO. 1210465-014-AC

was published in said newspaper in the issues of

JANUARY 20, 2006

Affiant further says that the said, The Suwannee Democrat is a newspaper published at Live Oak in said Suwannee County, Florida, and that the said newspaper has heretofore been continuously published in said Suwannee County, Florida, each week and has been entered as second class mail matter at the post office in Live Oak, in said Suwannee County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper

Louise Sheddan

Sworn to and subscribed before me this 20th day of January 2006.

Monja Robinson
Notary Public

(SEAL)

Personally known X or produced identification _____

Type of identification produced _____

MONJA ROBINSON
Notary Public, State of Florida
My comm. exp. Dec. 13, 2008
Comm. No. DD 378886

STATE OF FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

NOTICE OF PUBLIC MEETING

Suwannee American Cement
- Brantford Cement Plant
New Cement Production Line #2
Project No. 1210465-014-AC

The Department of Environmental Protection, Division of Air Resource Management, announces a public meeting to which all persons are invited. The meeting will be held on Tuesday, January 31, 2006 from 6:00 p.m. until no later than 8: p.m. It will be held at the Hatch Park Community Center, 403 Craven Street SE, Brantford, Suwannee County, Florida. A separate notice of this public meeting was published in the Florida Administrative Weekly dated January 20, 2006 and can be viewed at: <http://law.dos.state.fl.us/index.html>

The purpose of the meeting is to receive comments on the Department's Notice of Intent to issue a draft air construction permit to Suwannee American Cement. The proposed project will add a new cement processing line at the existing Brantford Cement Plant, which is located at 5117 U.S. Highway 27 in Suwannee County, Florida. The project is subject to preconstruction review for the Prevention of Significant Deterioration (PSD) of Air Quality pursuant to Rule 62-212.400, F.A.C.

The Department distributed an "Intent to Issue Permit" package on November 8, 2005. The applicant published a "Public Notice" of its intent in *The Suwannee Democrat* on November 16, 2005. No petitions for administrative hearings or extensions of time to petition for an administrative hearing were filed. This public meeting was requested pursuant to the procedures described in the "Public Notice" and is being held to accept comments on the proposed draft permit. Oral and written comments may be submitted at the meeting. All statements will become part of the Department's public record for this project.

The Department's "Intent to Issue Permit", "Draft Permit", and "Technical Evaluation and Preliminary Determination" can be viewed at <http://www.dep.state.fl.us/Air/permitting/construction/suwannee.htm> for the Kiln #2 project. A complete project file is available for review during normal business hours (8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays) at the following physical address for the Division of Air Resource Management: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Division's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. For questions related to this meeting, please contact Robert Bull at 850/921-9585.

Pursuant to the Americans with Disabilities Act, any person requiring special accommodations to participate in this meeting is asked to advise the agency at least 48 hours before the meeting by calling Ms. Scarce at (850) 921-9551, or by calling (800) 955-8771 (TDD) or (800) 955-8770 (Voice).
01/20

TOWN OF BRANFORD

Office of the Mayor

"On The Banks Of The Suwannee River"

Clerk's Office

FAX COVER LETTER

TOWN OF BRANFORD
P.O. Box 577
BRANFORD, FL. 32008
fax 935-3873
office 935-1146

Date 1-11-06

To: Bob Bull, DEP

Number of pages 1 (Including cover)

Instructions: This fax is to confirm the use
of Hatch Park for a public meeting
pertaining to Suwannee American Cement.
January 31, 2006 has been reserved for this
purpose. If additional help is needed, please
contact us at the above number.

FROM: Tonya Byrd

P.S.
There is no
charge for building.

RECEIVED

DEC 19 2005

BUREAU OF AIR REGULATION

4227 SW 102 Ter.

Gainesville, FL 32608

Dec. 17, 2005

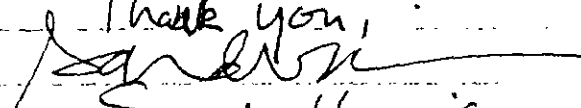
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

Dear Mr. Koerner:

I saw an article in the Gainesville Sun too late to write a comment, but I am sending a note anyway — for the future, perhaps.

If it is true that cement plants cause mercury problems for animals and people, then we should not make cement — unless we pay for the technology to stop the pollution. This could be done by raising the price of cement. If we are not willing to pay the full cost (including preventing the pollution), then we really need to choose an alternative to the production of cement. This is just basic

economics. The market system is a wonderful way for people to express preferences. It's like voting for one thing over another. But if all the costs aren't taken into account, the votes are meaningless and society as a whole suffers as a result.

Thank you,

Sarah Harrison

DEC 19 2005

2005

BUREAU OF AIR REGULATION

Dear Jeff,

my name is John H. Dame Jr.
I am a nature Artist based in
North Florida. I am writing you
today in regard to the proposed
expansion of the Suwannee American
Cement Plant.

Because the surrounding rivers
such as the Suwannee and the Santa Fe
are already in a state of mercury
emergency, as indicated by the
advisories placed upon them, I
strongly discourage any permitting
that will increase the mercury load.

Although It may be legal,
I FEEL THAT IT IS NOT MORALLY
OR ETHICALLY CORRECT

Please count me as one who
is against the proposed expansion.

Thank you.

John H. Dame Jr.

RECEIVED
JUL 15 2005
Evelyn Wood
9380 N.E. 1st Ave.
Branford FL 32008

Jeff Koerner
Manager of air permitting North Section
2600 Blair Stone Road
Mail Station 5505 Tallahassee FL 32399

Dear Sir:

you have quite an interesting title: you permit air

Well, I have written to the EPA, the Gainesville Sun, and now you, so at least ONE comment will be received.

UNTIL and UNLESS these plants are MADE to put in place really effective devices to almost completely do away with mercury emission, they should NOT be allowed to expand. Proof is already out there about levels of mercury in birds and fish, and the harm to human neurosystems.

The EPA (notably not on the side of environment or populace) says it would be too costly for the plants to have to do this. Hey, isn't the environment, or aren't lives worth some sacrifice from businesses?

Please really think about future results should you give out "air permits" without attaching enforceable requirements and/or restrictions.

Evelyn Wood

①



**Best Western
Citrus Hills Lodge**
350 East Norvall Bryant Highway
Hernando, Florida 34442
(352) 527-0015
Fax (352) 527-2360
For Reservations Call
1-888-424-6634

To: Jeff Koerner

DEP

Fax Number 850-921-9533

From: Emily Casey

Cell phone # 352-476-4425

Date Sent: Dec 16, 2005

4:18 p.m.

Concerning: Suncoast American Cement -
Mercury levels

Pages Sent: 2

(This is page 1)

2

Emily Casey
1430 E. Hartford St.
Inverness, Fl 34453

To: Mr. Jeff Koerner
DEP

Suwannee American Cement
(Brazilian)

As a concerned citizen I am submitting this letter in reference to the expansion of Suwannee Cement plant. Just wondering! Does the Clean Air Mercury Rule adopted on 3/15/05 only apply to power plants?? If so --- WHY??? - COST!!!?

In an article appearing in the Gainesville Sun it was stated that mercury is being emitted from coal fired cement plants and that it is important not to put an economic burden on the companies. Therefore it is not cost effective to require companies to use expensive technology to reduce the level of mercury going into our environment.

What was not printed but implied with the above statement is that the AMERICAN PUBLIC'S HEALTH AND WELFARE is of little importance as long as money can be saved by a company (in this case a BRAZILIAN CONGLOMERATE).

The problem here is the same as with all cement plants - pollution of the environment!! However, just because it is thought there is not a lot of mercury and other notorious pollutants being emitted into the air or water now, it does not mean that they should be allowed to emit more tomorrow!!

The inorganic mercury that the plant emits falls back to earth and is converted to methylmercury in the soil. This form of mercury builds up in the tissues of fish which many people eat and breathing vapors from mercury will have many harmful effects on people. It has been found by the National Academy of Sciences that even low levels of methylmercury is toxic to a child's developing brain and has been associated with brain damage and IQ loss.

This is a pristine area of the Nature Coast and many people depend on eco-tourism for their livelihoods. Why would anyone want to visit an area that has the distinction of having the biggest mercury polluter in the region! How can the wonderful natural resources that exist in this area continue to sustain themselves if MAN is allowed to continue to put more and more toxic waste into the environment? Remember that there is always an equal but opposite reaction to whatever we do, it just takes a long time to see the results of some actions!

The Suwannee American Cement plant should not be allowed to expand!! Please consider this fax as my public comment concerning mercury. Please place me on the mailing list to be notified about any activity on this permit.

Thank You, Emily Casey

12/16/05

December 14, 2005

2712 SW 5th Place
Gainesville, FL 32607

Jeff Koerner
Manager Air Permitting North Section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

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DEC 15 2005

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

I urge you to reconsider approval of the Suwannee American Cement plant on account of the danger posed by mercury emissions on people and the environment. The technology for control of toxic emissions is available and should be used to avoid major costs to the health of the population.

Fish from many of the lakes and rivers in our state contain high concentrations of mercury. Cement kilns and coal-fired power plants are two major sources of this contamination. Mercury can cause neurological damage to humans especially in the development of the nervous system. The costs to society resulting from exposing the population to toxic mercury far outweigh the savings from ignoring the potential for damage to public health.

The technology that safeguards the health of people shouldn't be seen as hostile to business and an unnecessary expense that should be avoided. Rather the price of products produced by any industry should reflect their true cost, including the need for strict control of emissions that are hazardous to human health. Meanwhile, technology for controlling such emissions provides an additional business opportunity.

Thank you for your consideration of this most important issue.

Sincerely,



Kenneth L. Clark

Send to Jeff by 2 DAY mail

Mailed to EPA Docket Center EPA Mailcode 6102 T, 1200 PA AVE NW, WASH DC 20460
202-260-4977 This message has been scanned for known viruses.

From: DiamondtelDeb
To: DiamondtelDeb
Cc: a-and-r-docket@epa.gov, stephanie.strength@usda.gov, citycomm@cityofGainesville.org
Bcc: Publisher@TXownsquareNews.com, johnvoell@yahoo.com, foe@foe.org, gteipel@fast.net, voice@gvillesun.com, Lvnsupport Show 4 more
Subject: No Expansion Cement Plant Branford, FL
Date: Mon, 12 Dec 2005 15:21:10 -0500

cc: Rep Andy Crenshaw, Sen's Mel Martinez + Gov. JEB BUSH (we've met) Bill Nelson

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DEC 15 2005

From the desk of Debbie and Arne Arnason, POB 886, Ft. White, FL 32038 386-497-3830
BUREAU OF AIR REGULATION

December 12, 2005 (Just learned of this in local paper)

Jeff Koerner, Mgr. of Air Permitting North Section
(Phone # not listed - FL DEP 850-488-1234)
2600 Blairstone Rd MS 5505, Tallahassee, FL 32399

This will cost me
\$ 13.75 to reach you in time!

RE: Public Comment on FL Dept of Environmental Protection draft permit for Suwanee American Cement's expansion in Branford, due by Dec. 16, 2005

Dear Jeff:


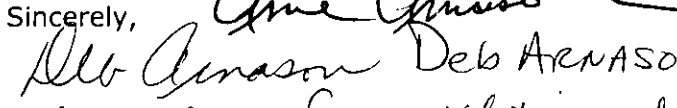
This letter is my plea to you to say "No" to further expansion of the mercury-producing cement plant in Branford. In fact, it is essential to the health of all area residents and property owners as well as to yourself and your family to monitor exactly how much mercury is currently produced and find ways to reduce that to -0-.

Because mercury is invisible is no reason to ignore this deadly poison in our environment, even if the present administration allows it for the monetary benefit of corporate polluters/supporters. Mercury is so toxic, the amount from just one thermometer can poison the fish in a lake for 25 years. In people, it causes many neurological problems from autism to ADD to Alzheimers to numbness and tingling, depression, brain fog and insanity. This has been known since the days of Alice in Wonderland when the Mad Hatter was typical of people who worked with mercury in hat factories. Alternatives ARE available, but when the corporate bottom line is quick money and our government condones ecoterrorism, you and I are at grave risk!

My husband ^{and I} just days ago moved from our travel trailer into our new house in Ft. White. We love the area and the people. We also own a small house in Branford and 3 pieces of property in 3 Rivers Estates near the plant. We love the area and the people. We would like to stay, but the particulate in this area is thick. Gainesville and Newberry with their Florida Rock Cement Plant expanding and its own coal-fired mercury producing energy plant claim they have stopped monitoring air emissions since 2002 because it was "too expensive" (sounds like insanity already).

Even my coop electric company, Clay Electric, is planning 3 new coal (mercury & CO2 producing) power plants without considering solar, geothermal, etc (view the movie 'Kilowatt Ours' for practical alternatives).

Attached is a copy of my letters to the editors of several local papers, to USDA and others. Many people are not so fortunate as myself to realize the cause of their problems. We could move again, but where? The buck stops here and I am doing my best to be part of the solution. You can be, too. Please, please help!

Sincerely,  ARNE ARNASON
 Deb ARNASON CC: EPA DOCKET CENTER
CC: To all my friends, relatives and support groups / Enclosures / Overnight Mail

12-14-05 Attached is copy with 17 Signatures against expansion - I could get hundreds but time is short. PLEASE, Jeff help us!

20727 NW 78 Avenue
Alachua, FL 32615
December 11, 2005

Jeff Koerner
Mgr. of Air Permitting North Section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

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DEC 15 2005

BUREAU OF AIR REGULATION

Mr. Koerner:

A few weeks ago, I was returning from a day of kayaking on the Ichetucknee and Santa Fe Rivers in Fort White and Branford, Florida, and saw the Suwannee American Cement plant for the first time. I was shocked. I could not fathom how such an industry could have been approved in that area of crystal clear springs and rivers.

I did some research on the internet, discovered the plant was applying for approval to double its size, and your name and address also came up. So even though I'm sure this one letter won't make a difference to a decision that's apparently already been made, I knew I wouldn't be able to look myself in the mirror if I didn't write this letter.

"Pristine" is a word you hear and read a lot when the topic is the Ichetucknee River and the springs that feed into it and the Santa Fe River. It's a word we tend to ignore because, really, is anything in this world still pristine? Well, I'm here to tell you that this area truly is.

I live 20 miles away from the Fort White-Branford area, and when my job took me to a position in Fort White two months ago, I couldn't wait to see the Ichetucknee River. Soon I was making canoe and kayak trips down the rivers, and swimming in them. The water clarity is amazing. It was easy to see the manatees who glided underneath me a couple of weeks ago.

The bird life is amazing. I'm not a birder, but even someone like me can recognize and appreciate the herons, egrets, and ibises that delicately fish for their lunches as they stand in the water. They bring birds into coal mines to test the air because birds are so sensitive to their surrounding air. The birds along the rivers near Suwannee American Cement Plant may well be the first victims if they are allowed to double the plant size. Babies and pregnant women may be the next.

According to my research, the larger plant would be permitted to emit more than 200 pounds of mercury per year. I don't know much about mercury except that it's bad for you. So I don't understand why we're going to allow a plant to emit even more of it.

I live less than two miles away from the Florida Rock cement plant in Newberry, Florida, which was also just approved for doubling its size. I can stand in my back yard and hear the loud humming noise, and feel the vibration, from the plant. I can't imagine what it will be like twice its current size.

And if Suwannee American Cement Plant is allowed to double in size, it will be four times the size of Florida Rock. I can't imagine how much more humming and vibrating will go on, but I know it will affect everything in the area, including people, wildlife, and the currently pristine rivers.

I've spoken to a lot of people in the area, and all of them are against this expansion, but they say they know it's a waste of time to write and call, that money talks, and in this case, money is doing ALL the talking. They know the Brazilian company which runs it has unlimited amounts of money to get what they want.

OK, I'll stop rambling now. As I said, I don't know much about all of this. But I know the most important thing. These cement plants are hurting our quality of life, the air we breathe, the animals we love, and the rivers and springs we cherish. And it's too bad that no one else seems to care.

Thank you,

A handwritten signature in cursive script, reading "Celeste B. Rubanick". The signature is written in black ink and is positioned above the printed name.

Celeste B. Rubanick

December 14, 2005

2712 SW 5th Place
Gainesville, FL 32607

Jeff Koerner
Manager Air Permitting North Section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

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DEC 15 2005

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

I believe it is imperative for the health and wellbeing of Florida residents that any expansion of the Suwannee American Cement plant be approved only under strict controls for mercury emissions.

I'm sure you're aware that fish from many of the water bodies in our state contain high concentrations of mercury, and cement kilns and coal-fired power plants are two major sources of this mercury contamination. As mercury can cause neurological damage in fetuses and children, including brain damage resulting in mental retardation, I would hope you would agree that an increase in mercury emissions is something that should be avoided at all costs.

Duly, it seems that it is in Florida's citizens' best interest for you to ensure sources of mercury pollution, especially major sources such as the Suwannee plant, adopt the best available technology for minimizing mercury emissions. Technology that safeguards the health of people shouldn't be seen as hostile to business and an unnecessary expense that should be avoided. Rather the price of products produced by any industry should reflect their true cost, including the need for strict control of emissions that are hazardous to human health. Meanwhile, technology for controlling such emissions provides an additional business opportunity.

Thank you very much for your consideration.

Sincerely,



Dawn Brooks

December 13, 2005

Jeff Koerner
Manager of Air Permitting – North Section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32300

RECEIVED

DEC 15 2005

BUREAU OF AIR REGULATION

Dear Mr. Koerner:

I am writing to you as a concerned citizen of the State of Florida, concerned about the mercury levels which are being allowed into the air in our state. I recently have read many articles regarding mercury; mercury from cement plants, mercury from coal which is helping to provide power for Florida's citizens, and mercury in the air and in our lakes and rivers – mercury which is destroying our game fishing and the quality of our breathable air.

From the information, which I have read, I have become aware that many of restrictions, which in the past had been placed on coal emissions, were placed on businesses by the federal government. As I understand from the information which I read, the federal government has chosen to honor big business and the money they can make rather than caring for the environment and people in Florida. Just recently previous restrictions were removed and it seems to be up to the business as to whether the business will protect the air and water and people near their site or make some additional money by being less careful.

One of the articles which I read stated that, "the Environmental Protection Agency's (EPA's) rule to regulate mercury emissions from power plants allows at least three times more mercury pollution from America's power plants than strong enforcement of our clean air laws and delays cleanup for more than a decade. Rather than enforce the Clean Air Act's directive to put strong controls on all toxic pollution from power plants, the rule removes them from the list of toxic pollutant sources."

Also from this article I found that, "in November 2005, the organization representing state and local air pollution regulators produced a model rule that gets dramatically greater reductions than the EPA's rule. While not as strong as it could be, the rule calls for far deeper cuts in mercury than EPA's rule and demonstrates that the technology is available - today - to reduce pollution at all power plants." It would be wonderful if there were a way to come up with a mercury plan that would cut more mercury emissions from power plants, in a shorter amount of time, than the current rule.

It appears that our federal government will allow many money making systems for Big Business but local and state governments will have to make corrections in these systems. If we do not care enough about our communities and the people within them the government will allow us to destroy our water, make the fish within our state poison to our bodies if eaten, and the air unbreathable for children and pregnant women.

I am hoping that this letter will reach you before the draft permit for Suwannee American Cement's expansion in Branford comes before you for review.

I am sure that there are many more citizens who are very concerned about the pollution of Florida's fresh water systems. I am also sure many citizens would appreciate the businesses involved to use the available safeguards and spend a little extra money to protect our environment.

Thank you for your assistance.

Sincerely,

Marsha A. Lyons

Marsha A. Lyons

726 NW 34th Avenue
Gainesville, FL 32609
December 13, 2005

RECEIVED

DEC 14 2005

BUREAU OF AIR REGULATION

Jeff Koerner, Mgr of air permitting north section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

Dear Mr. Koerner:

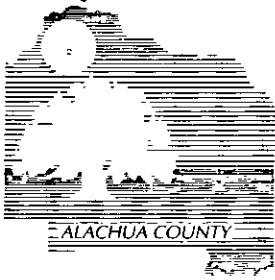
I strongly protest the draft permit by the Florida Department of Environmental Protection to permit the expansion of the Suwannee American Cement plant in Branford. This change in the plant's capacity would release extremely toxic levels of mercury, and this is unacceptable for the health of the people and the environment in our area. This project should never have been approved, and now every effort should be made to reverse this decision.

Sincerely,



Penny Guy

I



Alachua County Environmental Protection Department

RECEIVED

Chris Bird, Director

DEC 14 2005

December 13, 2005

BUREAU OF AIR REGULATION

Mr. Jeff Koerner
Manager, Air Permitting North Section
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 5505
Tallahassee, FL 32399

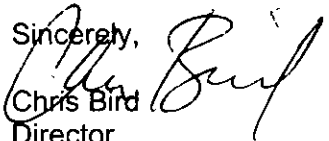
RE: Draft Air Permit No. PSD-FL-352, Project No. 1210465-013-AC for Suwannee American Cement Plant

Dear Mr. Koerner:

The Alachua County Environmental Protection Department (ACEPD) has concerns with the Draft Proposed Permit dated November 8, 2005 for the new Cement Production Line Kiln System at the Suwannee American Cement Plant in Branford in Suwannee County, Florida. ACEPD is concerned with the level of mercury emissions that will be permitted to be emitted by the Suwannee American plant. Alachua County is a neighboring county to Suwannee County, and the impact of the increased mercury emissions from this new cement kiln is of concern to the citizens of our County. Mercury is a know neurotoxin and when emitted into the air from power plants and cement kilns can be converted to the more toxic organic form that can bio-accumulate in water bodies, sediments and fish in our streams and lakes. ACEPD is concerned that the limit of 117 lbs per year of Mercury that is permitted in the Suwannee Cement plant permit is too high and increases the environmental and health risks to the citizens of our County. ACEPD understands that FDEP has evaluated mercury control technologies and existing federal and state regulations in establishing the permit level. However, we are concerned that current and proposed federal regulations do not adequately address the need for reduction of emission levels from cement plants.

ACEPD requests that FDEP require more stringent mercury control technology on the new Suwannee American plant to further reduce mercury emissions. Alternatively, the use of low mercury coal can be required to reduce emissions. The need for lower mercury emissions is consistent with the recent Federal regulations to require coal powered power plants to meet lower mercury emission standards.

If you have any questions about these comments, you may contact me at 352-264-6800.

Sincerely,

Chris Bird
Director



RECEIVED

DEC 12 2005

BUREAU OF AIR REGULATION

December 12, 2005

2507 NW 24 Terrace
Gainesville, FL 32605

Jeff Koerner
Manager Air Permitting North Section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

Dear Mr. Koerner:

The purpose of this letter is to comment on the proposed expansion of the Suwannee American Cement plant. This proposed expansion should not be approved without requiring controls for mercury emissions.

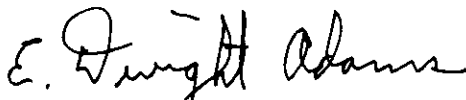
Mercury pollution is a major problem in Florida as indicated by the fact that fish from most water bodies contain high concentrations of mercury, making them unfit for human consumption, except in very small quantities. The main sources of the mercury are known to be cement kilns, coal-fired power plants, waste incinerators, etc.

The detrimental effects of mercury on human health, including brain damage in fetuses and children, are well documented. To allow ever-larger quantities of mercury to escape into the environment when it can be prevented is unconscionable.

The argument that the technology to reduce mercury emissions "would be too expensive" is unacceptable. For example, mercury emissions from incinerators can be reduced below 90% by the use of baghouses with flue temperatures of 120 degrees or less. Even if adding mercury emission controls to cement kilns increased the costs of cement by 100% or more that should be considered acceptable costs for avoiding brain damaged children. A family with a brain-damaged child because of mercury would not consider this "too expensive."

I urge DEP to protect human health and the environment rather than commercial interests by requiring mercury emission controls.

Sincerely,



E. Dwight Adams

Although the state's witness claimed this was not so, it was subsequently determined that our witness was correct. As DEP has admitted, in areas of South Florida where local mercury emissions have been curtailed, there has been a profound drop in mercury levels in fish and birds.

Also of great concern to our group is the environmental compliance record of the Suwannee-American Cement Company and the Anderson-Columbia Company, which created the former company to build this plant. Several years ago, Governor Bush declared in a press conference with then-DEP Secretary Struhs that Anderson-Columbia could not be trusted to operate such a facility in close proximity to the pristine Ichetucknee River. Specifically, we would note that this company has recently been fined for exceeding permitted emission levels and there was recently an apparent coal dust explosion that injured employees at the plant. Perhaps greater attention to compliance with existing permitted emission levels and employee safety might make mercury control equipment more affordable.

How can the DEP consider issuing permits for more mercury emissions when virtually every water body in Florida has some level of advisory on fish consumption? Most water bodies in Florida are, or will be, covered by TMDL regulations that require these water bodies to be safe to swim and fish in. Unfortunately, DEP chose not to list a mercury TMDL, saying it was an air quality problem. As you know, Sierra Club and the Clean Water Network have sued the state for not listing water bodies impaired from mercury. So far, the courts are in agreement with us.

Many people in this state depend on catching and eating fish to provide protein in their diet. When is DEP going to protect them? Furthermore, billions of dollars annually are involved in Florida's commercial and recreational fisheries. When these fish are too polluted with mercury to eat, what will happen to Florida's Fisheries? Commercial fishing jobs? Tourism related to recreational fishing?

We must also note that our air and water are becoming increasingly acidic due to emissions of sulfur dioxides. This is negatively affecting both flora and fauna in our state.

Florida and other gulf coast states are vulnerable to increasing intensity and frequency of hurricanes, due at least in part to climate change as a result of fossil carbon dioxide emissions. Burning coal releases more carbon into the atmosphere per unit of energy than any other fossil fuel.

While we understand that sustaining growth requires raw materials such as cement, the cost of these materials should reflect the impact on our environment and economy, including health impacts to persons who have little or no voice, and yet will likely bear the heaviest burden. We invite your department to hold a series of public meetings on this permit application throughout the region and face the people whose air, water and food will be further contaminated if this permit is granted.

Sincerely,



Rob Brinkman, Chair, Suwannee-St. John's Group of the Sierra Club

Send to Jeff by 2 Day mail

Mailed to EPA Docket Center EPA Mailcode 6102 T, 1200 PA AVE NW, WASH DC 20460

202-260-4977 This message has been scanned for known viruses. 32096

From: DiamondtelDeb *John Shannon, Lake City Fla 32024, white springs*
 To: DiamondtelDeb *Paul Christel*
 Cc: a-and-r-docket@epa.gov, stephanie.strength@usda.gov, citycomm@cityofGainesville.org *3561 NW LASSIE BLVD ST*
 Bcc: Publisher@TXownsquareNews.com, johnvoell@yahoo.com, foe@foe.org, gteipel@fast.net, voice@gvillesun.com, *BLASFS*
 Lvnsupport Show 4 more *Below* → *Signatures of people I met in P.O. who feel as I do, no time for me to get more*
 Subject: No Expansion Cement Plant Branford, FL *Why are we not informed sooner?*
 Date: Mon, 12 Dec 2005 15:21:10 -0500

May Copy Mailed 12/13/05

- Katharine Strickland 30274 65th Place C Branford, FL 32008

From the desk of Debbie and Arne Arnason, POB 886, Ft. White, FL 32038 386-497-3830

- Jackie Barm 5974 284th St Branford, Fla 32008

December 12, 2005 (Just learned of this in local paper)

- Paula Miller 472 SW Olympic PL Jeff Koerner, Mgr. of Air Permitting North Section Ft White FL (Phone # not listed - FL DEP 850-488-1234) 32038 *This will cost me 13.75 to reach you in time!*

- KATHY BISHOP SMYTH *Kathy Smyth* 663 SW NIBLACK AVE FORT WHITE, FL 32038

RE: Public Comment on FL Dept of Environmental Protection draft permit for Suwanee American Cement's expansion in Branford, due by Dec. 16, 2005

- Susan C. Jolley *Susan C. Jolley* 3128 200th Pl Lake City, Fla 32024

Dear Jeff: *Virginia Moorehead* 1295 SW Oaklawn Springs Rd

- *Virginia Moorehead* This letter is my plea to you to say "No" to further expansion of the mercury-producing cement plant in Branford. In fact, it is essential to the health of all area residents and property owners as well as to yourself and your family to monitor exactly how much mercury is currently produced and find ways to reduce that to, -0-. *Edith + Richard Jolley* 3TH 285th St Branford, Fla 32008

- *Martin G. Lone* 270 SW Lonrala Loop Fort white 497-3896

Because mercury is invisible is no reason to ignore this deadly poison in our environment, even if the present administration allows it for the monetary benefit of corporate polluters/supporters. Mercury is so toxic, the amount from just one thermometer can poison the fish in a lake for 25 years. In people, it causes many neurological problems from autism to ADD to Alzheimers to numbness and tingling, depression, brain fog and insanity. This has been known since the days of Alice in Wonderland when the Mad Hatter was typical of people who worked with mercury in hat factories. Alternatives ARE available, but when the corporate bottom line is quick money and our government condones ecoterrorism, you and I are at grave risk!

- *Lottie Davis* 264 SW Old Niblack Ave Fort white 497-1758

My husband just days ago moved from our travel trailer into our new house in Ft. White. We love the area and the people. We also own a small house in Branford and 3 pieces of property in 3 Rivers Estates near the plant. We love the area and the people. We would like to stay, but the particulate in this area is thick. Gainesville and Newberry with their Florida Rock Cement Plant expanding and its own coal-fired mercury producing energy plant claim they have stopped monitoring air emissions since 2002 because it was "too expensive" (sounds like insanity already).

- *Deanna Cook* P.O. Box 102 Ft. White, FL 32038

Even my coop electric company, Clay Electric, is planning 3 new coal (mercury & CO2 producing) power plants without considering solar, geothermal, etc (view the movie 'Kilowatt Ours' for practical alternatives).

- *Celate Rubanish* 318 SW Holstein Ave, Ft. White FL 32038

Attached is a copy of my letters to the editors of several local papers, to USDA and others. Many people are not so fortunate as myself to realize the cause of their problems. We could move again, but where? The buck stops here and I am doing my best to be part of the solution. You can be, too. Please, please help!

Sincerely, *Rosemary Reese* 1102 SW Cumacat Hill ST Ft white #386-288-2571

Arne Arnason Deb ARNASON CC: EPA Docket Center
CC: To all my friends, relatives and support groups / Enclosures / Overnight Mail

7626 Seelye Dr Ft White
EJ Conroy

E Frances Ehrlich
5400 NW 39th Ave Apt AA248
Gainesville, FL 32606

Jeff Koerner
2600 Blair Stone Rd
Mail Station 5505
Tallahassee, FL 32399

12/10/05

Dear Mr. Koerner;

PLEASE PAY ATTENTION!!

We cannot afford to be cavalier with our precious resources. Loopholes allowing misleading statistics on harmful pollutants are not acceptable excuses for allowing mercury emissions to be spewed into the air.

Winds carrying these emissions come down & pollute our waterway, food chain - AND US.

Complaining about the expense of technology to curb emissions is NOT a valid argument for not taking corrective measures - how much is your life & your family's lives, worth?

Although state environmental officials, "believe plant emissions are already producing low levels of pollution," this is not a worthy argument.

Must we sacrifice life for platitudes, while pushing the limits of how much is, "LOW"?

Sincerely,
Frances Ehrlich



P.O. Box 410
Branford, FL 32008

RECEIVED

DEC 02 2005

BUREAU OF AIR REGULATION

November 29, 2005

Ms. Trina Vielhauer
Division of Air Resources
Department of Environmental Protection
2600 Blair Stone Road, MS # 5500
Tallahassee, Florida 32399-2400

SUBJECT: Comments to Draft Air Permit No. PSD-FL-352
Suwannee American Cement – Branford Plant
DEP File No. 1210465-014-AC
Proposed New Kiln at the Branford Cement Plant in Suwannee County, Florida

Dear Ms. Vielhauer:

Suwannee American Cement (SAC) submits the following comments in response to the Florida Department of Environmental Protection's (Department) Draft Air Permit No. PSD-FL-352. SAC has included text from the Department's Draft Permit in *italic* for clarity with SAC comments following sections of the Draft Permit.

If the Department has any questions regarding the comments supplied or would wish to discuss in further detail please feel free to contact me at (386) 935-5039 or by e-mail at jbhorton@suwanneecement.com.

Sincerely,

Joe Horton
Suwannee American Cement

CC: Tom Messer - SAC
Celso Martini - SAC
Jeff Koerner - DEP

1. SAC provides the following comment in response to Section A. Kiln Line No. 2 System, Condition 4:

4. Kiln Process and Production Rate Limitations: The dry preheater feed material rate (including dry fly ash) to the kiln shall not exceed 1,789,230 tons during any consecutive 12 months. The clinker production rate of the kiln shall not exceed 127 tons per hour (24-hour rolling average) and 1,055,500 tons during any consecutive 12-months. The clinker production rate shall be determined by the following equation:

$$\text{Clinker Production} = [(\text{Kiln Feed}) (\text{Kiln Feed LOI Factor}) + (\text{Fly Ash Injection}) (\text{Fly Ash LOI Factor})]$$

Where:

- Kiln Feed as determined by Poldos control system
- "Fly Ash Injection" as determined from the rotary feed system or equivalent.
- The "Kiln Feed LOI Factor" and the "Fly Ash LOI Factor" shall be based on a 30 operating-day block average of daily measurements. For purposes of this requirement, an operating day is any day that the kiln produces clinker or fires fuel.

{Permitting Note: For reference, the kiln will be designed to process approximately 215 tons per hour of dry preheater feed material (including dry fly ash) through the kiln.} [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Application No. 1210465-014-AC]

The 12 month dry preheater feed rate of 1,789,230 was proposed in the Permit-to-Construct Application as only dry kiln feed and not including the dry fly ash injection introduced into the calciner portion of the kiln system. Dry fly ash was proposed at a maximum hourly rate of 40 tons per hour (tph) in addition to the dried preheater feed. The addition of the dried fly ash via injection regardless of rate would not change total clinker production limit as this is limited by the equation in condition 4. The associated clinker production limits of 127 tph (24-hour rolling average) and 1,055,500 per 12-month period reflect the correct rates for clinker production from both the input of the dry preheater feed and dry fly ash independently.

Additionally, SAC would request the use of "Poldos" in the equation in Condition 4 be replaced to "Preheater Feed Control System" as Poldos is a vendor specific name that would limit the supply of this type of equipment. Irregardless of vendor selection and appropriate feeder system capable of measurement of preheater feed will be installed to monitor the dosage of dry preheater feed.

SAC would propose the following modifications to the condition (deletions ~~striketrough~~ and additions underlined):

4. Kiln Process and Production Rate Limitations: The dry preheater feed material rate (~~including~~ excluding dry fly ash) to the kiln shall not exceed 1,789,230 tons during any consecutive 12 months. The clinker production rate of the kiln shall not exceed 127 tons per hour (24-hour rolling average) and 1,055,500 tons during any consecutive 12-months. The clinker production rate shall be determined by the following equation:

$$\text{Clinker Production} = [(\text{Kiln Feed}) (\text{Kiln Feed LOI Factor}) + (\text{Fly Ash Injection}) (\text{Fly Ash LOI Factor})]$$

Where:

- Kiln Feed as determined by kiln feed ~~Poldos~~ control system
- "Fly Ash Injection" as determined from the rotary feed system or equivalent.
- The "Kiln Feed LOI Factor" and the "Fly Ash LOI Factor" shall be based on a 30 operating-day block average of daily measurements. For purposes of this requirement, an operating day is any day that the kiln produces clinker or fires fuel.

{Permitting Note: For reference, the kiln will be designed to process approximately 215 tons per hour of dry preheater feed material (~~including~~ excluding dry fly ash) through the kiln.} [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Application No. 1210465-014-AC]

2. SAC provides the following comment in response to Section 3, Subpart A. Kiln Line No. 2 System, Emission Limitations and Performance Standards; Condition 10. The Draft Permit reflects a CO limit of 2.90 lb/ton of clinker and 368.3 lb/hr on a 30-day rolling average monitored continuously via a Continuous Emission Monitor (CEM). SAC agrees with the Department's use of a 30-day average for demonstration of compliance for CO since CO can vary due to process fluctuations. However, SAC has no experience with continual monitoring of CO with a certified CEM system. CO emissions were based off existing process data and recent BACT determinations. Based off of future process designs, which can help reduce fuel formation of CO, and process data gathered at SAC using current raw materials and fuels a reasonable BACT emission limit of 3.0 pounds of CO per ton of clinker was discussed with the Department. This included continual monitoring with a CEM system and no data exclusion for process upsets. SAC would propose that draft CO limit be replaced with a CO limit of 3.0 lb/ton of clinker and 381 lbs/hr. SAC would propose this as BACT limit.
3. SAC provides the following comment in response to Section 3, Subpart C. Miscellaneous PM Sources, Performance Requirements; Condition 4 - Opacity Standards. This section identifies all emission point sources in Emission Unit 011 as having a visible emission limit of 5% opacity including emission points N-09-02 Baghouse for Finish Mill Separator and N-12-02 Baghouse for Finish Mill Vent.

In 40CFR Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) Subpart LLL – Portland Cement Manufacturing Industry Subpart 1347 Standards for Raw and Finish Mills requires mill sweeps and air separators to meet a 10% opacity standard. Sources N-09-02 and N-12-02 meet the definitions of finish mill sweep and air separator however each has been given an opacity limit of 5% in the Draft Permit. SAC proposed a 5% opacity limit for all other sources in Emission Unit 14 (New) as BACT with the exception of N-09-02 Baghouse for Finish Mill Separator and N-12-02 Baghouse for Finish Mill Vent.

SAC would propose the following modifications to the condition (deletions ~~strikethrough~~ and additions underlined):

4. Opacity Standards: As determined in accordance with EPA Method 9 observations, the following standards apply to each emissions point of Emissions Units 003, 011, and 014 including the finish mill system, raw mill, raw material storage, clinker storage, finished product storage, conveyor transfer points, bagging and bulk loading and unloading systems.

a. Visible emissions from each baghouse exhaust points N-09-02 and N-12-02 shall not exceed ~~5-10%~~ opacity, and

b. Visible emissions from all other baghouse exhaust points shall not exceed 5% opacity, and

c. Visible emissions from any emissions point not controlled by a baghouse (i.e., conveyors) shall not exceed 10% opacity.

[Rule 62-212.400(BACT), F.A.C.]

4. SAC provides the following comment in response to Section 4, Appendices; Appendix E. On pages E2 and E3 a grain loading of 0.007grains/dscf is referenced but is unclear where this number originated. Within the permit and the permit application a grain loading of 0.0085grains/dscf was used and referenced. SAC believes this to perhaps be a mistaken number and requests the use of the 0.0085grains/dscf reference.