



Jeb Bush
Governor

Department of Environmental Protection

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

Colleen M. Castille
Secretary

April 15, 2005

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Tom Messer, Plant Manager
Suwannee American Cement, LLC
P.O. Box 410
Branford, FL 32008

Re: Request for Additional Information
DEP File No. 1210465-014-AC (PSD-FL-352)
Proposed New Kiln at the Branford Cement Plant in Suwannee County, Florida

Dear Mr. Messer:

On March 1, 2005, we received your air construction permit application through EPSAP for a second kiln at the Branford plant located at US 27 and CR 49, Branford, Suwannee County. Also, on February 4, 2005 we received the correct PSD permit processing fee from Suwannee American Cement (SAC) dated February 1, 2005 prior to your submittal of the application. Additional modeling information was received from SAC by the Department on March 17, 2005 and March 21, 2005. This request for additional information pertains to this additional modeling information.

1. Estimate the impact of mercury deposition in the vicinity of this facility. Please provide reasonable assurance that the 122 lb/year of mercury emissions will not be exceeded. Also, provide reasonable assurance that the lead PSD significance levels will not be exceeded. Advise of any methods that will be undertaken to minimize mercury emissions such as raw material selection or transferring some baghouse dust straight to product. [Rule 62-4.070(1), F.A.C.]

2. Please provide data supporting a silt loading factor of 0.15 g/m² in the paved road emissions estimation - inputs for use in the PM₁₀ modeling.

3. Please update and add Florida Rock Kiln 2 sources to Table 3-7, since these sources were included in the modeling results sent to us.

4. Please clarify the differences between Tables 3-2 and 3-5, and Tables 3-3 and 3-6. For instance Table 3-5 includes new, modified and existing SAC roadway characteristics and total PM₁₀ emissions while Table 3-2 shows only new and modified roadway characteristics. However sources PV15_4 through PV15_8 in Table 3-5 have lower PM₁₀ emission rates than the corresponding sources in Table 3-2. Provide additional tables listing the existing roadway, storage pile and other fugitive PM₁₀ emissions.

5. Please update Figure 2-2 with the detailed building structure information used in the modeling to determine downwash impacts. This information should include building dimensions for all buildings used in the modeling analyses. All stacks and buildings should be labeled. Additionally fence lines or physical barriers which preclude access to non-ambient air should be shown. Non-ambient air is the atmosphere over land owned or controlled by the source and to which public access is precluded by a fence or other physical barrier.

6. Rule 62-212.400(5)(h) 5, F.A.C. requires the applicant to provide information relating to the air quality impact of, and the nature and extent of, all general commercial, residential, industrial and other growth which has occurred since August 7, 1977, in the area the facility or modification would affect. Please provide this information. The additional impacts section 5.4 does not adequately address this requirement.

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7. The Florida Park Service has concerns about the air quality impacts in the Ichetucknee Springs State Park from this project. Please address these impacts on this Park and discuss the results of the PM₁₀ ambient monitoring data collected in this Park.

Pursuant to Rule 62-4.055, F.A.C., Permit Processing, the Department requests submittal of additional information prior to processing the application. For responses to any of the items below that require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Since the application is not complete, an *incomplete application* has been provided to the Federal Land Manager in accordance with Rule 62-212.400(4)(a)2., F.A.C. Federal Land Manager Participation. The FLM is responsible for demonstrating to the Department whether emissions from the facility will have an adverse impact on the air quality-related values (AQRVs including visibility) of the Federal Class I Area. The Department must consider such a demonstration in its Preliminary Determination if it is received within 30 days after the Department sends a complete application to the FLM.

We will forward any comments received from other agencies as soon as we receive them. Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call Bobby Bull at 850-921-9585. Matters regarding modeling issues should be directed to Cleve Holladay at 850/921-8986.

Sincerely,



James K. Pennington, P.E., Administrator
North Permitting Section

JKP/rlb

Joe Horton, SAC
Chris Kirts, DEP- NED
Chair, Suwannee County Board of County Commissioners
Stephanie Brooks, P.E., Brooks and Associates
Kent Berry, CAA Program Manager, Environmental Quality Management
Albert Gregory, DEP- FPS
Don Forgione, DEP- FPS
John Bunyak, NPS
Jim Little, EPA

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1. Article Addressed to:

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

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Susan Vaughan

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Susan Vaughan 1/19/05

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PS Form 3800, January 2001

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