

## **APPLICANT**

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

Below is a file summary of the Suwannee American Cement Application for construction of a second cement production line in Branford, Suwannee County. Items in black are located in this file. Items in red are stored in a separate file or electronically because of size (e.g. plant maps, modeling data and CADD drawings). This information is available in the Bureau of Air Regulation upon request.

### **Application Processing Schedule**

- Permit application and report received on February 25, 2005.
- Received Additional information from the applicant March 17, 2005 and March 21, 2005. (CD, Air Dispersion Modeling Report and e-mail transmittal letter)
- Department's request for additional information on March 31, 2005.
- Department's request for additional information on April 15, 2005.
- Applicant's additional information received April 28, 2005.
- Applicant's additional information received May 11, 2005.
- Department's request for additional information on June 10, 2005.
- Department forwarded comments from the Fish and Wildlife Service on June 15, 2005 (print out of e-mail)
- Applicant's additional information received June 24, 2005.
- Applicant submitted air quality modeling files on CD on July 8, 2005. (CD and letter)
  
- Applicant's additional information received July 20, 2005 via email.
- Department's request for additional information on July 22, 2005.
- Department's request for additional information on August 5, 2005.
- Applicant's additional information (partial) received August 29, 2005.
- Applicant's additional information received September 2, 2005 (revised CD of modeling output files). (CD and letter)
- Applicant's additional information received September 19, 2005 (revised CD of fence-line modeling output and updated pages for Attachment 1). (CD and letter)
- Applicant's additional information received September 20, 2005 (corrected worksheets of potential emissions for sources FQ2\_B40 and SP6\_FR2).
- Applicant's additional information received September 22, 2005 (hardcopies of revised facility layout drawings).
- Applicant's additional information received September 23, 2005 (email of AutoCAD files of revised facility layout drawings); complete.
- Applicant's additional information received October 20, 2005 (email).

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# Department of Environmental Protection

Jeb Bush  
Governor

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

Colleen M. Castille  
Secretary

March 31, 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.

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.

1. Provide details on the kiln burner and describe where air and fuel will be introduced and how they are staged to minimize NO<sub>x</sub> formation. Please indicate the type of burner that will be used. Rules 62-212.400 and 62-4.070(1), F.A.C.
2. Describe the manner in which the precalciner vessel(s) will operate. Indicate where and how tires, flyash, and non-hazardous solid waste will be combusted in the MSC device while maintaining the Low NO<sub>x</sub> conditions of the design. Rules 62-212.400 and 62-4.070(1), F.A.C.
3. Submit a projected chemical analysis of the raw materials and additives likely to be used at this plant. Provide a proximate and ultimate analysis of the fuels proposed. Rule 62-4.070(1), F.A.C.
4. Describe the primary fuel firing scenarios and describe the ratio of heat input at various fuel mixtures. Detail why heat input ratios might change under normal operating conditions and emissions. Provide an estimate of pollutant emissions under each scenario. Rule 62-4.070(1), F.A.C.
5. Describe all solid fuel proposed to be burned in the calciner. Justify the burning of non-hazardous solids (plastic, filter fluff, wood waste) up to 50 percent of the total heat input, and include any other solids proposed to be burned in the calciner. Explain whether the new line is subject to 40 CFR 60, subpart CCCC, New Source Performance Standards for Commercial/Industrial Solid Waste Incinerators constructed after November 30, 1999. Rule 62-4.070(1), F.A.C.
6. Describe all liquid fuel and non-hazardous liquids, including on-spec fuel oil, proposed to be burned in the kiln and/or calciner. Rule 62-4.070(1), F.A.C.
7. How many startup and shutdown events will normally occur each year? Describe the nature and duration of emissions, particularly from the in-line kiln/raw mill and clinker cooler, during startup and shutdown. Describe procedures used to minimize excess emissions during these events. Rules 62-4.070(1) and 62-210.700, F.A.C.

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*Printed on recycled paper.*

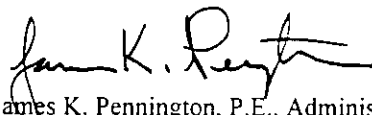
8. Has SAC or its parent company had any violations of Department regulations at this or any other of their facilities? Are there any unresolved violations? Please provide all documentation in relation to these violations. Rule 62-4.070(5), F.A.C.
9. Provide a description of the stack sampling facilities. Form 62-210.900(1), F.A.C.
10. Provide operation and maintenance plans for all major process and pollution control equipment. Form 62-210.900(1), F.A.C.
11. Clarify the maximum throughput rate for the new coal mill and coal transfer station. Is it 150,000 tons per year as indicated in the application? Rule 62-4.070(1), F.A.C.
12. Provide detailed information as to how mercury compound emission rates are measured, calculated and/or estimated. Rule 62-4.070(1), F.A.C.

Additional Modeling information was received from SAC by the Department on March 17, 2005 and March 21, 2005. This information will be sent to the Federal Land Manager for review as well as review by the Department. Upon review by the Federal Land Manager and the Department, a request for additional information may be issued by the Department.

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/rib

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

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery</p> <p>C. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below: <input type="checkbox"/></p>
<p>1. Article Addressed to:</p> <p>Mr. Tom Messer, Plant Manager Suwannee American Cement, LLC Post Office Box 410 Branford, Florida 32008</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7001 0320 0001 3692 2176</p>
<p>PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540</p>	

<b>U.S. Postal Service</b> <b>CERTIFIED MAIL RECEIPT</b> <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>										
7001 0320 0001 3692 2176	<table border="1"> <tr> <td data-bbox="540 1378 735 1421">Postage</td> <td data-bbox="735 1378 922 1421">\$</td> <td data-bbox="922 1378 1177 1581" rowspan="4">           Postmark Here         </td> </tr> <tr> <td data-bbox="540 1421 735 1464">Certified Fee</td> <td data-bbox="735 1421 922 1464"></td> </tr> <tr> <td data-bbox="540 1464 735 1517">Return Receipt Fee (Endorsement Required)</td> <td data-bbox="735 1464 922 1517"></td> </tr> <tr> <td data-bbox="540 1517 735 1570">Restricted Delivery Fee (Endorsement Required)</td> <td data-bbox="735 1517 922 1570"></td> </tr> </table> <p data-bbox="540 1623 1177 1751">           Mr. Tom Messer, Plant Manager            Suwannee American Cement, LLC            Post Office Box 410            Branford, Florida 32008         </p>	Postage	\$	Postmark Here	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)	
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<p>PS Form 3800, January 2001 See Reverse for Instructions</p>										