

Florida Department of
Environmental Protection

Memorandum

To: Joseph Kahn, Division of Air Resource Management
Through: Trina Vielhauer, Bureau of Air Regulation
Jeff Koerner, New Source Review Section
From: Christy DeVore, New Source Review Section
Date: February 8, 2010
Subject: Final Air Permit No. 1210465-018-AC (PSD-FL-259H)
Suwannee American Cement Plant
Revision of Ambient Monitoring and Third Party Audits

The final permit for this project is attached for your approval and signature. The project requires a minor air construction permit revision to authorize: removal of two ambient monitors located near the plant that measure and record particulate matter less than 10 microns in diameter (PM₁₀); and removal of the requirement to conduct third party audits of the plant. The existing Suwannee Cement Plant is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The project is not considered a new source review reform project.

The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

TLV/jfk/scd

FINAL DETERMINATION

PERMITTEE

Suwannee American Cement
Post Office Box 410
Branford, Florida 32008

PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)
Division of Air Resource Management
Bureau of Air Regulation, New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

PROJECT

Air Permit No. 1210465-018-AC/PSD-FL-259H
Air Construction Permit Revisions
Suwannee American Cement Plant

The applicant requested removal of two ambient monitors located near the plant that measure and record particulate matter less than 10 microns in diameter (PM₁₀) and removal of the requirement to conduct third party audits of the plant. The Department approves this request.

NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on January 12, 2010. The applicant published the Public Notice in the Suwannee Democrat on January 22, 2010. The Department received the proof of publication on February 1, 2010. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

COMMENTS

No comments on the Draft Permit were received from the public, the Northeast District, the EPA Region 4 Office or the applicant.

CONCLUSION

The final action of the Department is to issue the permit.



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE

Suwannee American Cement
Post Office Box 410
Branford, Florida 32008

Authorized Representative:
Mr. Tom Messer, Plant Manager

Air Permit No. 1210465-018-AC
PSD-FL-259H
Air Construction Permit Revision
Revisions to Ambient Monitoring
and Third Party Audits
Suwannee American Cement
Branford County, Florida

PROJECT

This is the final air construction permit, which revises two facility-wide specific conditions in Permit No. PSD-FL-259 related to ambient monitoring and third party audit requirements. The existing plant is a portland cement manufacturing plant categorized under Standard Industrial Classification No. 3241. The existing facility is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The UTM coordinates are Zone 17; 321.4 km East and 3315.9 km North.

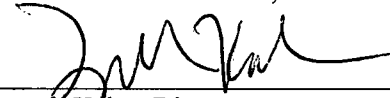
This final permit is organized into the following sections: Section 1 (General Information) and Section 2 (Permit Revisions).

STATEMENT OF BASIS

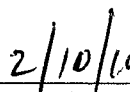
This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This revision is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. A copy of this permit modification shall be filed with the referenced permit and shall become part of the permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida



Joseph Kahn, Director
Division of Air Resource Management



(Date)

FINAL PERMIT REVISION

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 2/10/10 to the persons listed below.

- Mr. Tom Messer, SAC (tomm@suwanneecement.com)
- Mr. Joe Horton, SAC (jbhorton@suwanneecement.com)
- Mr. Celso Martini, VCSMC (celsom@vcsmc.com)
- Mr. Krishna Cole, SAC (krishnac@suwanneecement.com)
- Mr. Max Lee, Ph.D. P.E., K&A (mlee@kooglerassociates.com)
- Mr. Chris Kirts, DEP NED (christopher.kirts@dep.state.fl.us)
- Ms. Heather Abrams, U.S. EPA Region 4 (abrams.heather@epa.gov)
- Ms. Katy Forney, U.S. EPA Region 4 (forney.kathleen@epamail.epa.gov)
- Ms. Victoria Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

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.



(Clerk)

2/10/10
(Date)

SECTION 1. GENERAL INFORMATION

FACILITY DESCRIPTION

The existing facility is a Portland Cement Manufacturing Plant.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PROPOSED PROJECT

The applicant requested revisions to the PSD permit to change the following permit conditions.

Condition 28 – Ambient PM_{10} Monitoring: The permittee requests authorization to remove two ambient monitors that measure particulate matter less than 10 microns in diameter (PM_{10}).

Condition 31 – Third Party Audit Reports: The permittee requests authorization to discontinue the third party audits.

The Department approves the requests as conditioned by this permit revision.

SECTION 2. PERMIT REVISIONS

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight in the electronic document.

Permit Being Modified: Permit No. PSD-FL-259

Affected Emissions Units: All

Section II. Facility-Wide Specific Conditions

28. Ambient Monitoring Required: The owner or operator shall install and operate two ambient monitoring devices for suspended particulate matter less than 10 microns (PM₁₀) at offsite locations (sites) to be determined by the Department. The devices shall be installed and operational within 120 days of final issuance of this permit. These devices shall operate continuously with access to the instrument provided to the Ambient Monitoring Section (AMS) of the Department's Bureau of Ambient Monitoring and Mobile Sources (BAMMS) by means of telephone. The monitoring devices shall be located as designated by the Department. The monitoring devices shall be of those designated as an EPA equivalent method and must be year 2000 compliant. The monitoring equipment shall be operated as long as required by the Department, however the owner or operator may petition the Department to review the monitoring requirements after five years of operation, and every five years thereafter. Requests for review shall be directed to the AMS.

Ambient monitoring activities required by this permit for PM₁₀ shall be conducted in such a manner so as to meet the Department's minimum quality assurance requirements as delineated in 40 CFR Parts 50 and 58.14; Part 58, Appendices A, C, D and E; and the Department's *State-Wide Quality Assurance Air Program Plan (Plan)*. Changes to the *Plan* will be distributed by the BAMMS to the owner or operator. The owner or operator shall comply with *Plan* changes as soon as practicable, but no later than upon renewal of this permit.

The owner or operator shall, within 90 days of the effective permit date, submit to the Department for review and approval standard operating procedures for each monitor, calibrator and ancillary piece of equipment utilized in the production of the required ambient air quality data.

The owner or operator shall submit the verified monitoring data and quality assurance results to BAMMS within ninety (90) days after the end of each calendar quarter in an electronic medium and format: either Aerometric Information Retrieval System (AIRS) or other EPA acceptable electronic format for the monitoring data, and the Precision and Accuracy Data (PAData) or other EPA acceptable electronic format for the quality assurance data, as specified by the Department.

The owner or operator shall allow Department auditors, with a minimum of seven (7) days prior notification, access to the monitoring locations for the purpose of the performance of accuracy audits which may be completed in lieu of, or in addition to, the owner or operator's quarterly accuracy audits as specified in 40 CFR, Part 58, Appendix A, 3.2 and 3.4. The owner or operator shall also submit to an annual systems audit as specified in 40 CFR Part 58, Appendix A, 2.5. The systems audit, which reviews the quality assurance and monitoring effort for the preceding year, shall be conducted between February and June of the year following the year in which the audited data were produced. In addition, the Department staff shall be allowed access to the monitoring locations, with a minimum of seven (7) days prior notification, on an annual basis, for the purpose of determining compliance with the siting requirements as specified in 40 CFR Part 58, Appendix E.

Beginning in 2002 and prior to startup of the new cement plant, the permittee installed the two required PM₁₀ ambient monitors and collected and reported ambient data for the past seven years. The ambient data collected from these monitoring sites show no adverse impacts; therefore, the permittee has satisfied the intent of this permit requirement. Beginning March 1, 2010, the permittee is no longer required to operate the PM₁₀ monitors and the monitors may be removed from each site. The permittee shall continue to operate

SECTION 2. PERMIT REVISIONS

and maintain the monitors up to this date and shall submit a close-out report to the Bureau of Air Regulation summarizing the ambient PM₁₀ emissions and any periods of missing data. The close-out report shall be submitted before May 1, 2010.

[Rule 62-212.400(5)(g), F.A.C.]

31. Third Party Audit: The owner or operator shall contract with an independent third party, acceptable to the Department, knowledgeable in the processes and control equipment used at this plant, to perform an audit of the maintenance records and physical condition of the plant process equipment and emission control equipment. This audit will be conducted once each year for a minimum of five years from the start of operation of the plant. The auditor shall make a report to the owner or operator on the condition of the process and emission control equipment, and the adequacy of the owner or operator's maintenance program and activities. One copy of the annual report shall be forwarded to the Department's Northeast District office for review, within 45 days of completion of each audit. After five years of reports that show the process and emission control equipment is being properly maintained, the Department shall evaluate the need to continue this requirement.

The permittee satisfied the requirement to conduct the third party audits for six years. In general, the third party reports show that the plant has been well maintained and operated. As of the issuance date of this permit revision, the permittee is no longer required to conduct third party audits.

[Rule 62-4.070(3), F.A.C.]

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, February 10, 2010 2:01 PM
To: 'tomm@suwanneecement.com'
Cc: 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'krishnac@suwanneecement.com'; 'mlee@kooglerassociates.com'; Kirts, Christopher; 'abrams.heather@epa.gov'; 'forney.kathleen@epamail.epa.gov'; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H
Attachments: 1210465-018-AC_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.018.AC.F_pdf.zip

Owner/Company Name: SUWANNEE AMERICAN CEMENT CO.

Facility Name: SUWANNEE AMERICAN CEMENT

Project Number: 1210465-018-AC/ PSD-FL-259H

Permit Status: FINAL

Permit Activity: CONSTRUCTION

Facility County: SUWANNEE

Processor: Christy DeVore

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/emission/apds/default.asp>.

Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
sylvia.livingston@dep.state.fl.us

Note: The attached document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: <http://www.adobe.com/products/acrobat/readstep.html>.

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Wednesday, February 10, 2010 2:19 PM
To: 'commissioners@suwcounty.org'; 'Kaseys@suwcounty.org'; 'bocc@alachuacounty.us'; 'chris@alachuacounty.us'; Greenhalgh, Tom; 'long5892@bellsouth.net'; 'RobBrinkman@cox.net'; 'Imcshe2001@aol.com'; 'Svenn@ichetucknee.org'; 'bruderly@aol.com'; 'kacmd@aol.com'; 'dmot51@aol.com'; 'diandv@bellsouth.net'
Cc: DeVore, Christy
Subject: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H
Attachments: 1210465-018-AC_Signatures.pdf

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Livingston, Sylvania

From: Messer Tom [tomm@suwanneecement.com]
Sent: Wednesday, February 10, 2010 5:20 PM
To: Livingston, Sylvania
Subject: Re: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H

Received

-----Original Message-----

From: Livingston, Sylvania <Sylvia.Livingston@dep.state.fl.us>
To: Messer Tom
CC: Horton Joe; Martini Celso; Cole Krishna; mlee@kooglerassociates.com
<mlee@kooglerassociates.com>; Kirts, Christopher <Christopher.Kirts@dep.state.fl.us>;
abrams.heather@epa.gov <abrams.heather@epa.gov>; forney.kathleen@epamail.epa.gov
<forney.kathleen@epamail.epa.gov>; Gibson, Victoria <Victoria.Gibson@dep.state.fl.us>;
DeVore, Christy <Christy.DeVore@dep.state.fl.us>; Koerner, Jeff
<Jeff.Koerner@dep.state.fl.us>; Walker, Elizabeth (AIR) <Elizabeth.Walker@dep.state.fl.us>
Sent: Wed Feb 10 14:00:43 2010
Subject: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H

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Owner/Company Name: SUWANNEE AMERICAN CEMENT CO.
Facility Name: SUWANNEE AMERICAN CEMENT Project Number: 1210465-018-AC/ PSD-FL-259H Permit
Status: FINAL Permit Activity: CONSTRUCTION Facility County: SUWANNEE

Processor: Christy DeVore

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