

# Florida Department of Environmental Protection

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## Memorandum

To: Trina Vielhauer, Bureau of Air Regulation  
Through: Jeff Koerner, New Source Review Section *JK*  
From: Christy DeVore, New Source Review Section *CD*  
Date: January 8, 2010  
Subject: Draft Minor Source Air Construction Permit  
Project No. 1210465-018-AC (PSD-FL-259H)  
Suwannee American Cement Plant  
Revisions of Ambient Monitoring and Third Party Audits

Attached for your review is a draft minor air construction permit revision package for the existing Suwannee American Cement Plant which is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. Briefly, the draft permit revision authorizes: removal of two ambient monitors located near the plant that measure and record particulate matter less than 10 microns in diameter ( $PM_{10}$ ); and removal of the requirement to conduct third party audits of the plant. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is not considered a new source review reform project. Day 90 of the permitting time clock is January 20, 2010. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/scd

**P.E. CERTIFICATION STATEMENT**

**PERMITTEE**

Suwannee American Cement  
Post Office Box 410  
Branford, Florida 32008

Draft Permit No. 1210465-018-AC  
(PSD-FL-259H)  
Suwannee American Cement Plant  
Revisions of Ambient Monitoring and  
Third Party Audits  
Branford County, Florida

**PROJECT DESCRIPTION**

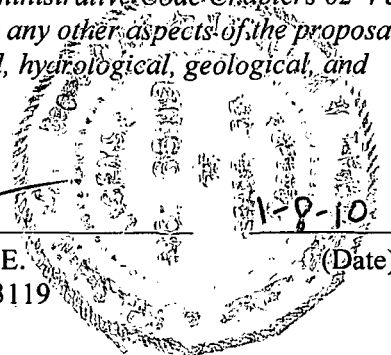
The applicant requests authorization to remove two ambient monitors located near the plant that measure and record particulate matter less than 10 microns in diameter (PM<sub>10</sub>). The applicant also requests removal of the requirement to conduct third party audits of the plant. The Department approves the request as conditioned in the draft permit.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (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. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

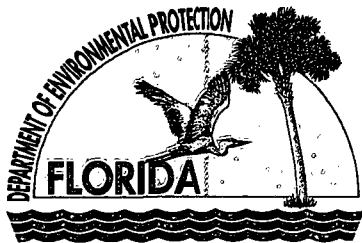
*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters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



S. Christine DeVore, P.E.  
Registration Number 63119



(Date)



# 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

January 11, 2010

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

Re: Project No. 1210465-018-AC (PSD-FL-259H)  
Suwannee American Cement, Suwannee American Cement Plant  
Revisions to Ambient Monitoring and Third Party Audits

Dear Mr. Messer:

On October 22, 2009, you submitted an application requesting the removal of the requirement for the two PM<sub>10</sub> monitors and removal of the requirement for third party audits of the plant. The existing facility is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. 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, Christy DeVore, at 850-921-8968.

Sincerely,

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk/cd

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

Suwannee American Cement Plant  
Post Office Box 410  
Branford, Florida 32008

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

*Authorized Representative:*  
Mr. Tom Messer, Plant Manager

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

**Project:** The applicant requests authorization to remove two ambient monitors located near the plant that measure and record particulate matter less than 10 microns in diameter (PM<sub>10</sub>). The applicant also requests removal of the requirement to conduct third party audits of the plant. The Department approves the request as conditioned in the draft permit. Details of the project are provided 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 the 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) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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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 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. 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. All comments filed will be made available for public inspection.

**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 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 14 days of publication of the attached Public Notice or within 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 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 (in a proceeding initiated by another party) 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 when and how each petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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.

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

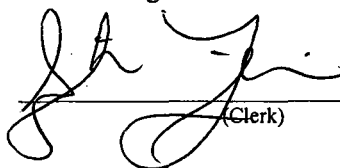
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) 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 1/12/10 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. Kathy Forney, EPA Region 4 (forney.kathleen@epa.gov)
- Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
- Ms. Vickie 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)

1/12/10  
(Date)

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Draft Air Construction Permit  
Project No. 1210465-018-AC (PSD-FL-259H)  
Suwannee American Cement, Suwannee American Cement Plant  
Suwannee County, Florida

**Applicant:** The applicant for this project is Suwannee American Cement. The applicant's authorized representative and mailing address is: Mr. Tom Messer, Plant Manager, Suwannee American Cement, Suwannee American Cement Plant, Post Office Box 410, Branford, Florida 32008.

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

**Project:** The applicant requests authorization to remove two ambient monitors located near the plant that measure and record particulate matter less than 10 microns in diameter (PM<sub>10</sub>). The applicant also requests removal of the requirement to conduct third party audits of the plant. Ambient air quality data collected by these monitors have not shown adverse impacts from the cement plant. The third party audits have identified that the plant is well maintained and operated. Therefore, the Department authorizes the plant to remove the two PM<sub>10</sub> ambient monitors and discontinue the third party audits.

**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 Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. 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 the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number:  
<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air construction 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 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. 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. All comments filed will be made available for public inspection.

(Public Notice to be Published in the Newspaper)

**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 at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 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 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 (in a proceeding initiated by another party) 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 when and how the petitioner received notice of the agency action or proposed decision; (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 including an explanation of how the alleged facts relate to the specific rules or statutes; 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**

**APPLICANT**

Suwannee American Cement  
5117 U.S. Highway 27  
Branford, Florida

Suwannee American Cement Plant  
Facility ID No. 1210465

**PROJECT**

Project No. 1210465-018-AC (PSD-FL-259H)  
Revision of Permit No. PSD-FL-259  
Request to Remove Two Ambient Monitors and Discontinue Third Party Audits

**COUNTY**

Suwannee County, Florida

**PERMITTING AUTHORITY**

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

January 8, 2010

## **1. GENERAL PROJECT INFORMATION**

### **Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### **Facility Description and Location**

The Suwannee American Cement 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 site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### **Facility Regulatory Categories**

- 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.
- 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, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### **Project Description**

On October 22, 2009, the applicant requested revisions to two PSD permit conditions for: removal of two ambient monitors located near the plant that measure and record particulate matter less than 10 microns in diameter ( $PM_{10}$ ); and removal of the requirement to conduct third party audits of the plant.

## **2. PSD APPLICABILITY**

### **General PSD Applicability**

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD

applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;
- 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 following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m<sup>3</sup>, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project 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**

The project will revise permit conditions related to monitoring and reporting. There will be no emissions increases and the project is not subject to PSD preconstruction review.

## **3. DEPARTMENT REVIEW**

### **PM<sub>10</sub> Ambient Monitors**

Particulate matter (PM) is generated in a wide range of sizes: fine or PM<sub>2.5</sub> particles, which are less than 2.5 microns in diameter; and PM<sub>10</sub> particles which are less than 10 microns in diameter and also include PM<sub>2.5</sub> particles. Particulate matter originates from many different stationary and mobile sources as well as from natural sources. Both PM<sub>2.5</sub> and PM<sub>10</sub> emissions result from fuel combustion in motor vehicles, power generation and

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

industrial facilities, residential fireplaces and wood stoves. In addition, unpaved roads, materials handling, crushing and grinding operations as well as windblown dust and sea salt are sources of  $PM_{2.5}$  and  $PM_{10}$  emissions.

In 1987, the NAAQS for particle pollution was changed from total suspended particulate matter to  $PM_{10}$ , which is the inhalable fraction. This resulted in states establishing a network for monitoring  $PM_{10}$  emissions. In July of 1997, a new  $PM_{2.5}$  standard was promulgated to regulate particles that posed the greatest threat to human health. In 1999, Florida began a new  $PM_{2.5}$  monitoring network and by 2006, Florida's monitoring network consisted of over 40  $PM_{10}$  monitors in 20 counties and 32  $PM_{2.5}$  monitors in 21 counties.

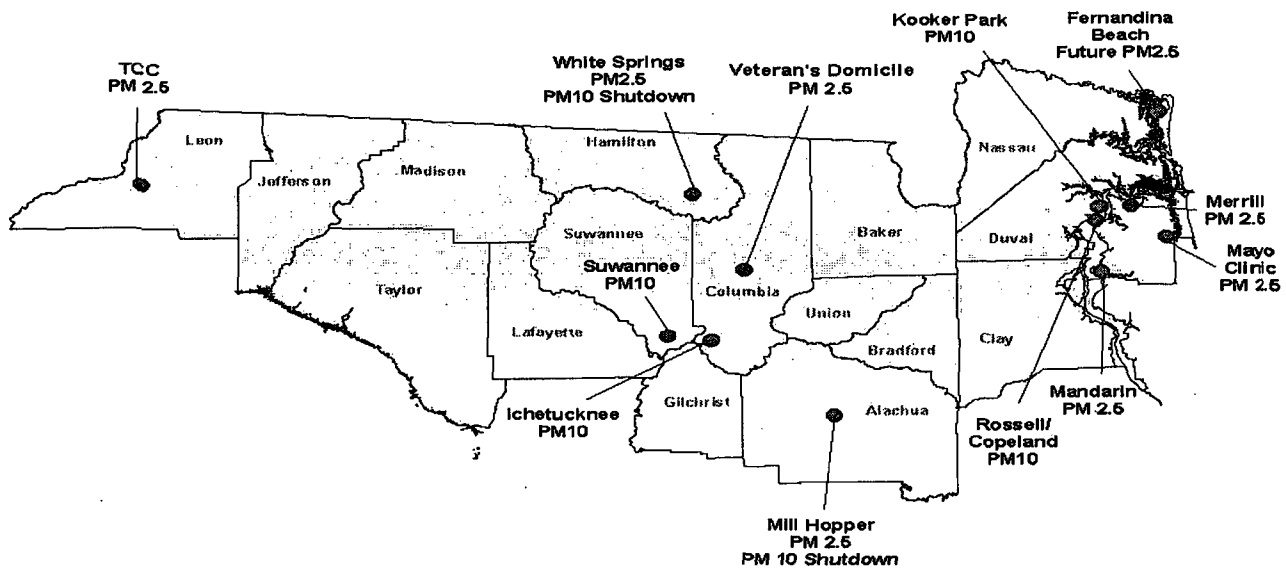


Figure 1-1.  $PM_{10}$  and  $PM_{2.5}$  monitors in North Florida

The NAAQS for  $PM_{10}$  is 50 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) based on an annual arithmetic mean; and 150  $\mu\text{g}/\text{m}^3$  based on a 24-hour average not to be exceeded more than once per year. Although parts of Florida experience nuisance amounts of particles in the form of dust or pollen,  $PM_{10}$  concentrations have always been less than the annual standard. The NAAQS for  $PM_{2.5}$  is 15.0  $\mu\text{g}/\text{m}^3$  based on an annual arithmetic mean and 35  $\mu\text{g}/\text{m}^3$  based on a 24-hour average, which is not to be exceeded by the three-year average of the 98th percentile. From 1988 to 2003,  $PM_{10}$  levels in the Southeastern United States declined by an average of 25%. This coupled with the fact that  $PM_{2.5}$  has greater impact on health issues has led to a decrease in number of  $PM_{10}$  monitors and an increase in the number of  $PM_{2.5}$  monitors in Florida.

As part of the original preconstruction permit, Suwannee American Cement (SAC) plant was required to install a  $PM_{10}$  monitor in the vicinity of the plant and one in the Ichetucknee State Park to provide assurance that particulate emissions from the new cement plant would not adversely impact this area. These monitors have operated since 2002 and the new cement plant began operation in 2003. The following table shows the ambient  $PM_{10}$  concentrations for the two Suwannee American Cement monitors as well as two nearby monitoring stations maintained by the Department.

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

Station/Year	PM <sub>10</sub> Ambient Concentrations (µg/m <sup>3</sup> )		
	24-hour		Annual
	High	2 <sup>nd</sup> High	High
<b>SAC, Suwannee Plant (Branford)</b>			
2008	62	62	21
2007	212	124	25
2006	55	50	21
2002	86	42	19
<b>SAC, Ichetuknee Springs State Park</b>			
2008	52	50	22
2007	260	166	26
2006	77	60	24
2002	88	54	23
<b>Mill Hopper (Gainesville)</b>			
2008	53	51	17
2007	163	77	19
2006	54	39	18
2002	38	36	15
<b>White Springs</b>			
2008	---	---	---
2007	107	94	27
2006	55	52	20
2002	73	50	17

Data collected in 2002 shows PM<sub>10</sub> concentrations prior to operation of the new cement plant. Since then, the PM<sub>10</sub> monitors have consistently recorded values well below the 24-hour and annual standards (less than 65% of the standards), except for 2007 when recorded values were very high due to wildfire impacts. Excluding the data collected during the wildfire events, all of the PM<sub>10</sub> monitors demonstrate compliance with both the 24-hour and annual PM<sub>10</sub> standards. The following table shows the ambient PM<sub>2.5</sub> concentrations for three nearby monitoring stations maintained by the Department.

**TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION**

Station/Year	PM <sub>2.5</sub> Ambient Concentrations (µg/m <sup>3</sup> )			
	24-hour		Annual	
	98 <sup>th</sup> Percentile	98 <sup>th</sup> Percentile 3-Year Average	Weighted Annual Average	3-Year Annual Average
<b>Mill Hopper (Gainesville)</b>				
2006	20.1		9.08	
2007	27.5		9.03	
2008	15.0	20.8	7.36	8.49
<b>White Springs</b>				
2006	-	-	-	-
2007	26.7	-	14.64	-
2008	20.5	-	10.44	-
<b>Lake City</b>				
2006	-	-	-	-
2007	27.8	-	13.17	-
2008	21.9	-	11.64	-

The Mill Hopper monitor demonstrates compliance with both the 24-hour and annual PM<sub>2.5</sub> standards. There is not yet sufficient data to provide valid averages for the White Springs and Lake City monitors, which are special purpose monitors. Since the monitoring data has shown no adverse impacts from operation of the cement plant, the Department will allow the plant to remove both of the existing PM<sub>10</sub> monitors as conditioned by the draft permit.

**Third Party Audits**

Condition No. 31 of Permit No. PSD-FL-259 required the permittee to conduct an annual third party audit to assess the maintenance and physical operation of the plant. The condition allows the Department to discontinue the third party audits if the plant has shown it is properly maintained. Since the audit reports for the past six years have indicated proper maintenance, the Department authorizes the permittee to discontinue the third party audits as conditioned in the draft permit.

**Miscellaneous Information**

On February 15, 2006, the Department issued a PSD air construction permit (PSD-FL-352) to install a second kiln; however, construction on the second kiln never began and the permit expires on February 15, 2010. In discussions, the applicant indicated that there are no current plans to submit a new application for a second kiln at this site.

**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

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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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. Christy DeVore is the project engineer responsible for reviewing the application and drafting the air construction permit revision. 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 PERMIT REVISION

## 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

(DRAFT)

\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

\_\_\_\_\_  
(Date)



**DRAFT PERMIT REVISION**

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**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 \_\_\_\_\_(DRAFT)\_\_\_\_\_ 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.

(DRAFT)

\_\_\_\_\_

(Clerk)

\_\_\_\_\_

(Date)

## SECTION 1. GENERAL INFORMATION (DRAFT)

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### 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 (DRAFT)

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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 (PM<sub>10</sub>) 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 PM<sub>10</sub> 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 PM<sub>10</sub> 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 PM<sub>10</sub> monitors and the monitors may be removed from each site. The permittee shall continue to operate

**SECTION 2. PERMIT REVISIONS (DRAFT)**

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and maintain the monitors up to this date and shall submit a close-out report to the Bureau of Air Regulation summarizing the ambient PM<sub>10</sub> 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:** Tuesday, January 12, 2010 4:40 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com';  
'krishnac@suwanneecement.com'; 'mlee@kooglerassociates.com'; Kirts, Christopher;  
'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff;  
DeVore, Christy; Walker, Elizabeth (AIR)  
**Subject:** SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H  
**Attachments:** 1210465-018-AC\_Intent.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".

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.018.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.018.AC.D_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

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

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION / Revision of Ambient Monitoring and Third Party Audits

**Facility County:** SUWANNEE

**Processor:** Christy DeVore

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Sylvia Livingston  
Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
Department of Environmental Protection  
850/921-9506  
[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Monday, January 25, 2010 3:53 PM  
**To:** 'tomm@suwanneecement.com'  
**Subject:** FW: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H  
**Attachments:** 1210465-018-AC\_Intent.pdf

Dear Mr. Messer:

We have not received confirmation that you were able to access the documents attached to this January 12th e-mail. Please confirm receipt by opening the attachment and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

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

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**Sent:** Tuesday, January 12, 2010 4:40 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'krishnac@suwanneecement.com'; 'mlee@kooglerassociates.com'; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; DeVore, Christy; Walker, Elizabeth (AIR)  
**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:** DRAFT  
**Permit Activity:** CONSTRUCTION / Revision of Ambient Monitoring and Third Party Audits  
**Facility County:** SUWANNEE

## Livingston, Sylvia

---

**From:** Messer Tom [tomm@suwanneecement.com]  
**Sent:** Monday, January 25, 2010 3:59 PM  
**To:** Livingston, Sylvia  
**Subject:** Re: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H

Received,  
Thanks,  
Tom

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

**From:** Livingston, Sylvia <Sylvia.Livingston@dep.state.fl.us>  
**To:** Messer Tom  
**Sent:** Mon Jan 25 15:52:32 2010  
**Subject:** FW: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H

Dear Mr. Messer:

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Sylvia Livingston

Bureau of Air Regulation

Division of Air Resource Management (DARM)

850/921-9506

[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey <http://survey.dep.state.fl.us/?refemail=Sylvia.Livingston@dep.state.fl.us> . Thank you in advance for completing the survey.

From: Livingston, Sylvia  
Sent: Tuesday, January 12, 2010 4:40 PM  
To: 'tomm@suwanneecement.com'  
Cc: 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'krishnac@suwanneecement.com';  
'mlee@kooglerassociates.com'; Kirts, Christopher; 'forney.kathleen@epa.gov';  
'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; DeVore, Christy; Walker, Elizabeth  
(AIR)  
Subject: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.018.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.018.AC.D_pdf.zip)

Owner/Company Name: SUWANNEE AMERICAN CEMENT CO.  
Facility Name: SUWANNEE AMERICAN CEMENT Project Number: 1210465-018-AC/ PSD-FL-259H Permit  
Status: DRAFT Permit Activity: CONSTRUCTION / Revision of Ambient Monitoring and Third Party  
Audits Facility County: SUWANNEE

Processor: Christy DeVore

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Sylvia Livingston

Bureau of Air Regulation



## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Tuesday, January 12, 2010 4:44 PM  
**To:** 'krishnac@suwanneecement.com'  
**Subject:** SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H  
**Attachments:** 1210465-018-AC\_Intent.pdf

Dear Sir/ Madam:

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**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.  
**Facility Name:** SUWANNEE AMERICAN CEMENT  
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**Permit Status:** DRAFT  
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**Facility County:** SUWANNEE  
**Processor:** Christy DeVore

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Department of Environmental Protection  
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[sylvia.livingston@dep.state.fl.us](mailto: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:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Tuesday, January 12, 2010 5:12 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H

received.

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Tuesday, January 12, 2010 4:40 PM  
**To:** tomm@suwanneecement.com  
**Cc:** jbhorton@suwanneecement.com; celsom@vcsmc.com; krishnac@suwanneecement.com; mlee@kooglerassociates.com; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; Koerner, Jeff; DeVore, Christy; Walker, Elizabeth (AIR)  
**Subject:** SUWANNEE AMERICAN CEMENT; 1210465-018-AC/ PSD-FL-259H

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.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.018.AC.D_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.  
**Facility Name:** SUWANNEE AMERICAN CEMENT  
**Project Number:** 1210465-018-AC/ PSD-FL-259H  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION / Revision of Ambient Monitoring and Third Party Audits  
**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/eproducts/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