



Florida Department of Environmental Protection

Memorandum

To: Jeff Koerner, Air Permitting and Compliance Section 
From: Christy DeVore, Air Permitting and Compliance Section 
Date: June 28, 2011
Subject: Draft Minor Source Air Construction Permit
Project No. 1210465-022-AC
Suwannee American Cement, LLC, Branford Cement Plant
Revision to Miscellaneous Alternative Fuel Trials

Attached for your review is a draft minor air construction permit 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 revises Permit No. 1210465-020-AC, for temporary short-term trials to co-fire coal with the following alternative fuel materials in the existing kiln to gather operational and emissions data: non-chlorinated plastics, tire-derived fuel, reject roofing shingles, used roofing shingle scraps, clean woody biomass, agricultural fibrous organic byproducts, pre-consumer reject paper, post-consumer paper and carpet-derived fuel. This permit adds alternative fuel mixes and engineered fuel. The amounts of each material are limited. Each trial is limited to no more than 90 operational days. The following emissions will be continuously monitored during each trial: carbon monoxide, nitrogen oxides, sulfur dioxide, total hydrocarbons and stack opacity. The plant must continue to comply with all emissions standards.

The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project includes a new source review reform review. Day 90 of the permitting time clock is August 30, 2011. I recommend your approval of the attached draft permit package.

Attachments

P.E. CERTIFICATION STATEMENT

PERMITTEE

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

Draft Permit No. 1210465-022-AC
Branford Cement Plant
Trials of Alternative Fuel Materials
Suwannee County, Florida

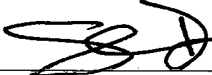
PROJECT DESCRIPTION

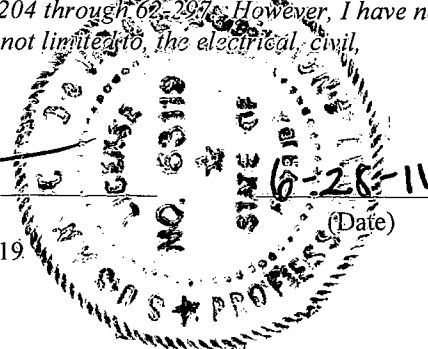
The applicant requests a revision to Permit No. 1210465-020-AC, which authorized short-term operational trials to co-fire coal in existing Kiln No. 1 with the following materials: non-chlorinated agricultural plastics, tire-derived fuel, manufacturer reject roofing shingles, used roofing shingles, clean woody biomass, agricultural fibrous organic byproducts (e.g., peanut hulls, rice hulls, corn husks, citrus peels, cotton gin byproducts and animal bedding), pre-consumer reject paper, post-consumer waste paper and carpet derived fuel. To date, the plant has completed a portion of the trial burn for non-chlorinated agricultural plastics. On June 1, 2011, the permittee requested a modification to: increase the trial from 30 operating days to 90 operating days; remove the specific manufacturer name of the equipment; define non-chlorinated agricultural film as non-chlorinated only; change the asbestos testing requirement for used roofing shingles; add an alternative fuel mix; add 5,000 tons of engineered fuel to the trial of alternative fuels; remove the requirements for stack testing for dioxins/furans, HCl, pesticides, metals and particulate matter; and remove the requirement for reporting information considered confidential by the applicant in the test report. In addition the permittee requested increases in the amount of alternative fuels as follows: non-chlorinated agricultural film from 1,250 tons to 3,000 tons; pre-consumer paper from 3,500 tons to 5,000 tons; post-consumer paper from 3,500 tons to 5,000 tons; and carpet-derived fuel from 2,500 tons to 6,500 tons.

The revised draft permit limits the amounts of each material and each trial is limited to no more than 90 operational days of firing the alternative fuel material. The following emissions will be continuously monitored during each trial: carbon monoxide, nitrogen oxides, sulfur dioxide, total hydrocarbons and stack opacity. For the temporary trials stack testing was removed for D/F, HCl, metals, PM and pesticides because: D/F is controlled by long residence times at high temperatures followed by rapid cooling to inhibit reformation; HCl is removed by natural scrubbing of limestone in the kiln; sampling/analysis of metals input plus removal by baghouse and eventual reincorporation into the clinker; PM is controlled by the baghouse with relatively little additional dust loading from firing alternative fuels; initial analytical results for non-chlorinated plastics show very low levels of residual pesticides which will be readily destroyed in the high temperature combustion zones. The plant must continue to comply with all emissions standards in the current Title V air operation 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





Florida Department of Environmental Protection

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

June 28, 2011

Sent by Electronic Mail – Received Receipt Requested

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

Re: Project No. 1210465-022-AC
Suwannee American Cement, Branford Cement Plant
Revision to Temporary Short-Term Trials of Miscellaneous Alternative Fuel Materials

Dear Mr. Messer:

You submitted an application requesting a revision to the temporary trials of alternative fuel materials to add alternative fuel mixes and engineered fuel. This air construction permit revises Permit No. 1210465-020-AC, which authorizes trial burns for non-chlorinated plastics, tire-derived fuel, reject roofing shingles, used roofing shingle scraps, clean woody biomass, agricultural fibrous organic byproducts, pre-consumer reject paper, post-consumer paper and carpet-derived fuel. 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 850/717-9085.

Sincerely,

A handwritten signature in black ink that reads "Jeffery F. Koerner".

Jeffery F. Koerner, Program Administrator
Air Permitting and Compliance Section
Division of Air Resource Management

Enclosures

JFK/scd

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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

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

Project No. 1210465-022-AC

Suwannee American Cement Plant
Revision to Alternative Fuel Trials
Suwannee County, Florida

Authorized Representative:

Mr. Tom Messer, Plant Manager

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

Project: This air construction permit revises Permit No. 1210465-020-AC, which authorizes trial burns for non-chlorinated plastics, tire-derived fuel, reject roofing shingles, used roofing shingle scraps, clean woody biomass, agricultural fibrous organic byproducts, pre-consumer reject paper, post-consumer paper and carpet-derived fuel. Alternative fuel mixes and engineered fuel were requested by the permittee to add to the temporary trials. 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. 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 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

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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 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.

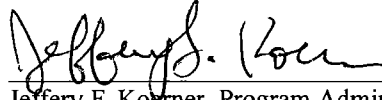
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; 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



Jeffery F. Koerner, Program Administrator
Air Permitting and Compliance Section
Division of Air Resource Management

6-28-11

(Date)

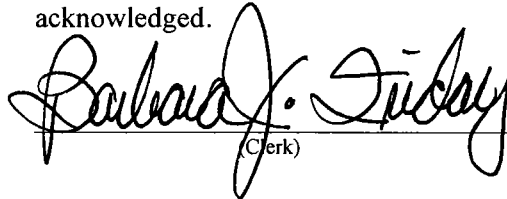
CERTIFICATE OF SERVICE

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 6/29/11 to the persons listed below.

cc: Mr. Tom Messer, Suwannee American Cement, LLC (tomm@vcsmc.com)
Mr. Celso Martini, VCSMC (celsom@vcsmc.com)
Mr. Joe Horton, VCSMC (jbhorton@vcnainc.com)
Mr. Krishna Cole, Suwannee American Cement, LLC (krishnac@vcsmc.com)
Mr. Max Lee, Ph.D., P.E., K&A (mlee@kooglerassociates.com)
Mr. Chris Bird, Director of Alachua County Department of Environmental Regulation (chris@alachuacounty.us)
Ms. December McSherry (lmcsh2001@aol.com)
Ms. Annette Long, Save Our Suwannee, Inc. (long5892@bellsouth.net)
Mr. Thomas Ellison, (dmot51@aol.com)
Chair, Suwannee County Board of County Commissioners (commissioners@suwcounty.org)
Chair, Alachua County Board of County Commissioners (bocc@alachuacounty.us)
Mr. Greg Strong, DEP Northeast District (greg.strong@dep.state.fl.us)
Mr. Chris Kirts, DEP Northeast District (christopher.kirts@dep.state.fl.us)
Ms. Kathleen Forney, EPA Region 4 (forney.kathleen@epa.gov)
Ms. Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Mr. David Langston, EPA Region 4 (langston.david@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)

6/29/11

(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. 1210465-022-AC
Suwannee American Cement, Branford 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 Branford Cement Plant, which is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida.

Project: The applicant requests revisions to Permit No. 1210465-020-AC, for temporary short-term trials to co-fire coal with the following alternative fuel materials in the existing kiln to gather operational and emissions data: non-chlorinated plastics, tire-derived fuel, reject roofing shingles, used roofing shingle scraps, clean woody biomass, agricultural fibrous organic byproducts, pre-consumer reject paper, post-consumer paper and carpet-derived fuel. This project adds alternative fuel mixes and engineered fuel. The amounts of each material are limited. Each trial is limited to no more than 90 operational days. The following emissions will be continuously monitored during each trial: carbon monoxide, nitrogen oxides, sulfur dioxide, total hydrocarbons and stack opacity. The plant must continue to comply with all emissions standards.

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 850/717-9000.

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

(Public Notice to be Published in the Newspaper)

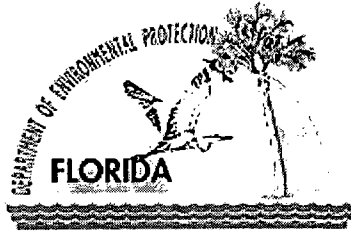
Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

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 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 32008

Branford Cement Plant
Facility ID No. 1210465

PROJECT

Project No. 1210465-022-AC
Revision to Temporary Trial of Multiple Alternative Fuels

COUNTY

Suwannee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Air Permitting and Compliance Section
2600 Blair Stone Road, MS#5505
Tallahassee, Florida 32399-2400

June 28, 2011

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.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of the draft permit.

Facility Description and Location

Suwannee American Cement operates an existing Portland cement manufacturing plant, which is categorized under Standard Industrial Classification Code No. 3241. The existing Branford Cement Plant is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The UTM coordinates of the existing facility are Zone 17, 321.4 kilometers (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.

Description of the Existing Pyroprocessing System

The existing kiln at the Branford Cement Plant is a dry preheater/precalciner kiln, a design which improves the thermal efficiency and production capacity by adding material feed separators (cyclone vessels) arranged vertically in a preheater tower before the kiln. Hot exhaust gas passes through the material feed separators in the preheater tower counter to the raw material flow, which provides heat transfer between the gas and solid streams. The improved heat transfer allows the kiln length to be reduced as well as dry the raw materials in the raw mill.

Coal and petroleum coke are burned in the precalciner combustion chamber at the inlet to the kiln as well as at the main burner at the discharge end of the kiln. Temperatures reach approximately 3000° F in the main burner flame, 2200° F in the kiln and 1800° F in the calciner. The applicant provided the following schematic representing the conditions of a modern preheater/pre-calciner kiln.

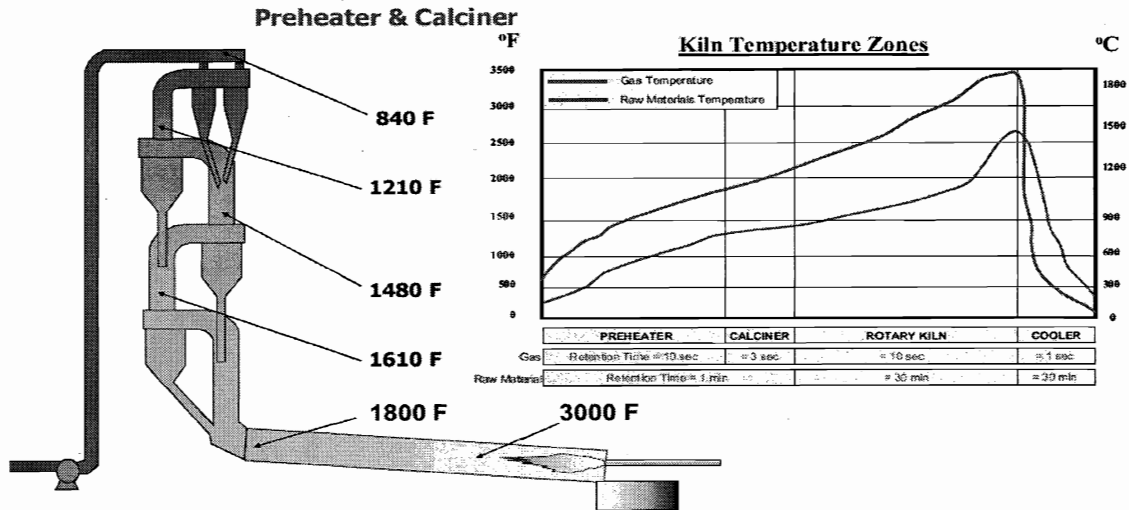


Figure 1. Kiln Temperatures and Retention Times

As shown, gas temperatures in the calciner are approximately 1800° F with a 3 second retention time. Gas temperatures at the inlet to the kiln exceed 2000° F. The high temperatures and long retention times provide excellent combustion of fuels. Figure 2 is a process flow diagram for a dry process preheater/pre-calciner cement plant.

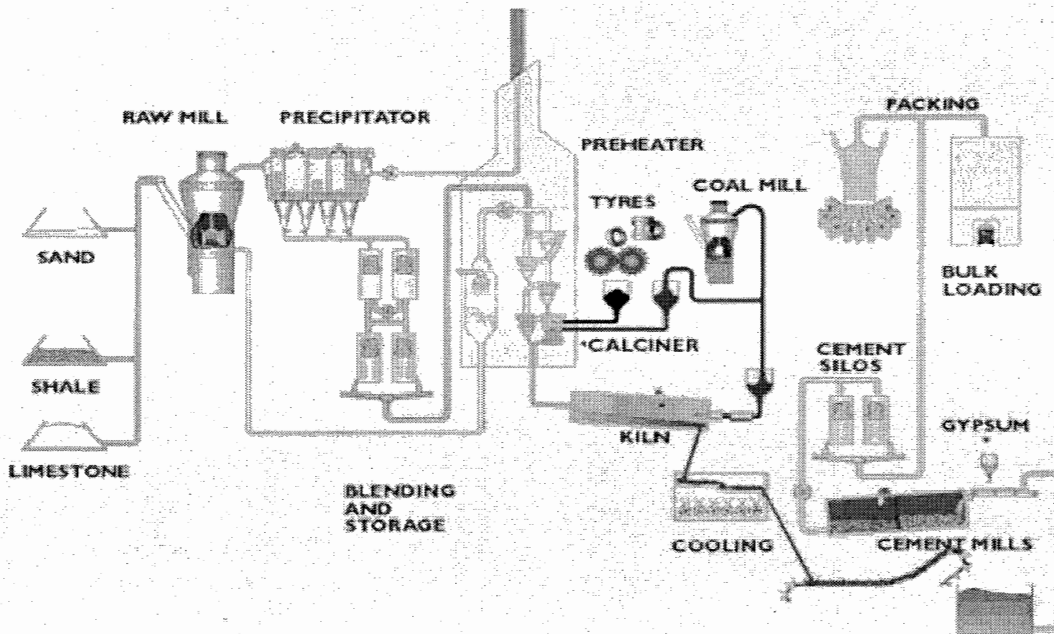


Figure 2. Process Flow Diagram - Dry Process Preheater/Pre-calciner Cement Plant¹

As shown, an induced draft fan pulls hot exhaust gases from the kiln through the preheater tower, the raw mill, a baghouse and out the stack. Raw materials (limestone, sand and iron ore) are fed into the raw mill, which grinds and mixes the raw materials to form raw meal. Raw meal is transferred to the raw meal storage silo

¹ From the Department's Project No. 1210465-004-AC; Originally from Blue Circle Home Page at <http://www.cement.bluecircle.co.uk>; Teleconference between A.A. Linero (Florida DEP) and W. McLendon (Blue Circle) with permission to use modified version of Blue Circle cement process diagram; March 19, 2001.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

countercurrent to the hot exhaust gas, which is used to dry the raw meal. Raw meal is fed into the preheater tower, where the solid materials again flow countercurrent to the hot exhaust gas, which preheats the raw meal before being introduced to the pyroprocessing kiln. The kiln transforms the raw meal into cement clinker, which is cooled and eventually ground to size in the finish mill with other additives to form the final cement product.

For the Branford Cement Plant, particulate matter from the kiln and the raw mill are controlled by the baghouse and not the electrostatic precipitator shown in the above figure. Dust collected in the baghouse is diverted to the raw meal storage silo since this material is basically raw meal. This type of pyroprocessing system eliminates cement kiln dust (CKD), which used to be handled as a waste product. When the raw mill is off line, the raw meal silo contains enough raw meal to continue operating the kiln for approximately two days until the raw mill is brought back on line.

Emissions of nitrogen oxides are controlled by a selective non-catalytic reduction (SNCR) system. Emissions of nitrogen oxides (NO_x), sulfur dioxide (SO₂) and total hydrocarbons (THC) are monitored with certified continuous emissions monitoring systems (CEMS). Stack opacity is monitored with a certified continuous opacity monitoring system (COMS). Carbon monoxide (CO) emissions are monitored with process CEMS.

Temporary Short-Term Trials of Multiple Alternative Fuels

On November 12, 2010, the Department issued Permit No. 1210465-020-AC, which authorized short-term operational trials to co-fire coal in existing Kiln No. 1 with the following materials: non-chlorinated agricultural plastics, tire-derived fuel, manufacturer reject roofing shingles, used roofing shingles, clean woody biomass, agricultural fibrous organic byproducts (e.g., peanut hulls, rice hulls, corn husks, citrus peels, cotton gin byproducts and animal bedding), pre-consumer reject paper, post-consumer waste paper and carpet derived fuel. See the *Technical Evaluation and Preliminary Determination* for this project. To date, the plant has completed a portion of the trial burn for non-chlorinated agricultural plastics.

On June 1, 2011, the permittee requested a modification to:

- Increase the trial from 30 operating days to 90 operating days;
- Remove the specific manufacturer name for the temporary feed equipment;
- Re-define non-chlorinated agricultural film as non-chlorinated plastics;
- Refer to NESHAP Subpart M in 40 CFR 61 for asbestos testing requirements for used roofing shingles;
- Add a trial for alternative fuel mixes;
- Add 5,000 tons of engineered fuel to the trial of alternative fuels;
- Remove the requirements for stack testing for dioxins/furans, HCl, pesticides and metals; and
- Remove the requirement for reporting information considered confidential by the applicant in the test report.

In addition the permittee requested increases in the amount of alternative fuels as follows:

- Non-chlorinated plastics from 1,250 tons to 3,000 tons;
- Pre-consumer paper from 3,500 tons to 5,000 tons;
- Post-consumer paper from 3,500 tons to 5,000 tons; and
- Carpet-derived fuel from 2,500 tons to 6,500 tons.

Suwannee American Cement (SAC) in partnership with its material suppliers is working to develop an engineered fuel material. As part of these efforts, a large representative pre-trial samples (approximately 2 tons) of material was received from the supplier and classified by hand into various components to determine a baseline for future comparisons. Initial analysis involved hand sorting the material to identify and classify all combustible components. The materials were classified by visual inspection and sorted into the following categories:

- Wood Products: non-treated lumber, plywood, fiber board, laminate board, etc.
- Foam, Fabrics and Carpet: cellulose, polystyrene, polyurethane, fabrics, carpet, leather, etc.
- Paper Materials: paper, corrugated cardboard, wax paper, tar paper, etc.

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- Plastic Materials: plastic containers, films, etc. (small amounts of PVC were present, but chloride concentration as measured is around 0.03%)

Based on this analysis expected concentrations of the classified combustibles, on a mass percent basis, are as follows: 62.4% wood products, 10.7% foam, fabrics and carpet, 12.2% paper materials and 14.7% plastic material. SAC also created homogenized samples of the material and shipped them out for third party external analysis of the following (see analysis results in Table 1): Proximate & Ultimate Analysis – ASTM Method D5142, D4239, 5865, & 5373, Metals – SW 846-6010B, 7470A/7471A, Chloride, Fluoride, & Bromide – SW 846 9056 & 5050.

Table 1: Initial pre-trial results of engineered fuel material.

PROXIMATE & ULTIMATE ANALYSIS	Method	Units	AVERAGE	Std Dev	Minimum	Maximum	N	# Non Detect
TOTAL MOISTURE	AST D3302, 5142	% wt	10.74	2.38	8.09	14.46	8	N/A
ASH	ASTM D5142	% wt	26.12	6.36	15.22	33.41	8	N/A
VOLATILE	ASTM D5142	% wt	59.57	6.98	49.92	70.21	8	N/A
FIXED CARBON	Calculation	% wt	3.57	3.12	0.13	8.58	8	N/A
SULFUR	ASTM D4239	% wt	1.28	0.68	0.37	2.13	8	N/A
CALORIFIC VALUE	ASTM D5865	BTU/lb	5,694	1,353	3,746	7,746	8	N/A
CARBON	ASTM D5373	% wt	32.96	5.00	28.74	41.18	8	N/A
HYDROGEN	ASTM D5373	% wt	4.15	0.66	3.56	5.21	8	N/A
NITROGEN	ASTM D5373	% wt	0.67	0.13	0.56	0.94	8	N/A
OXYGEN BY DIFFERENCE	Calculation	% wt	24.08	3.35	20.81	29.72	8	N/A
Halides	Method	Units	AVERAGE	Std Dev	Minimum	Maximum	N	# Non Detect
CHLORIDE	SW846 9056	% wt	0.031	0.004	0.026	0.035	4	0
FLUORIDE	SW846 9056A	% wt	0.0011	0.0005	0.0008	0.0018	4	0
BROMIDE	SW846 5050	% wt	0.0021	0.0003	0.0018	0.0024	4	0
Metal	Method	Units	AVERAGE	Std Dev	Minimum	Maximum	N	# Non Detect
ARSENIC	SW846 6010B	% wt	0.0023	0.0011	0.0014	0.0037	4	0
BARIUM	SW846 6010B	% wt	0.014	0.013	0.003	0.033	4	0
CADMIUM	SW846 6010B	% wt	0.0042	0.0083	0.0000	0.0166	4	0
CHROMIUM	SW846 6010B	% wt	0.0038	0.0008	0.0028	0.0048	4	0
COPPER	SW846 6010B	% wt	0.0047	0.0016	0.0032	0.0067	4	0
LEAD	SW846 6010B	% wt	0.0027	0.0013	0.0014	0.0042	4	0
MAGNESIUM	SW846 6010B	% wt	0.425	0.289	0.199	0.809	4	0
MERCURY	7470A/7471A	mg/kg	0.24	0.044	0.200	0.290	4	0
NICKEL	SW846 6010B	% wt	0.0011	0.001	0.000	0.003	4	0
SELENIUM	SW846 6010B	% wt	0.00024	0.000	0.000	0.000	4	2
SILVER	SW846 6010B	% wt	0.000033		0.000	0.000	4	3
THALLIUM	SW846 6010B	% wt	Non Detect		0.000	0.000	4	4
ZINC	SW846 6010B	% wt	0.013	0.001	0.011	0.016	4	0

SAC will use this collected data as a baseline for comparison to test trial results for variability and will provide the results of this comparison in the test burn report submitted after completion of the engineered fuel material test trial. SAC will also work with its suppliers to continuously improve the quality of the engineered fuel material based on SAC's fuel requirements.

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. An existing, new or modified 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;

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- 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 listed 28 PSD-major facility categories (which include Portland cement plants).

The regulated PSD pollutants include: carbon monoxide (CO); nitrogen oxides (NO_x); sulfur dioxide (SO₂); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM₁₀); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H₂S); total reduced sulfur (TRS) including H₂S; reduced sulfur compounds including H₂S; and mercury (Hg). There are additional PSD pollutants specific to municipal waste combustors and landfills.

A PSD applicability review is required for all projects at new and existing major and minor stationary sources. Once it is determined that the existing facility is, or that the new or modified facility will be, a major stationary source, the project emissions increases are then compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the PSD pollutants. If the potential emissions increase exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant. Also, note that 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/m³, 24-hour average. For each significant PSD pollutant, 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 "significant" for several PSD pollutants.

PSD Applicability for Project

Based on firing alternative fuel materials in similar cement kilns at plants in the United States and other countries, the applicant predicts that co-firing alternative fuel materials with coal/petroleum coke will result in negligible changes in the emission rates of PSD pollutants for the following reasons.

- CO and VOC emissions will be controlled by the high temperatures and long residence time in the calciner (1600 to 1800° F for 3 seconds), which was specifically designed with a separate calciner chamber for firing alternative fuels. CO will be monitored continuously with a process monitor and THC will be monitored continuously with a certified CEMS as a surrogate for VOC emissions.
- NO_x emissions will be controlled with the existing SNCR system by adjusting the ammonia injection rate as necessary. NO_x emissions will be continuously monitored by certified CEMS.
- Particulate matter will be controlled with the existing baghouse. The combustion of alternative fuel materials is not expected to generate substantially more particulate matter than coal combustion considering the largest portion of particles removed by the baghouse are raw materials used in making cement. The stack opacity is continuously monitored by COMS, which will provide an indication of potential changes in PM emission rates.
- SO₂ and HCl emissions increases will be negligible because of the natural scrubbing due to the highly alkaline limestone introduced as a raw material and the thorough mixing of limestone with the exhaust gas by the rotating kiln as well as the turbulence provided in the preheater/precalciner section.
- Based on previous studies for this industry, more than 99.7% of the lead will be captured and bound in the cement clinker and retained in the final cement product. Other metal emissions are expected to be negligible from firing the requested alternative fuels. Most of these materials do not normally contain metals. For the engineered fuel, metals are recovered by the supplier as a valuable commodity. Metals that do enter the calciner would be removed in the baghouse dust, which is re-circulated to the preheater tower as feed. Tests on similar kilns indicate that semi-volatile and non-volatile metals are eventually incorporated into the clinker. Only mercury, a highly volatile metal is expected to be emitted. For mercury, the plant is required to

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conduct a material balance on all of the raw materials and fuels to demonstrate compliance with the mercury limit.

- Dioxin/Furan (D/F) emissions will continue to be destroyed by the long residence times at high temperatures in the kiln (~10 seconds at 2,800°F) and calciner (~3 seconds at 1,800°F) and inhibited from reforming by rapid gas cooling in the preheater tower. The baghouse inlet temperature will be continuously monitored to ensure effective D/F control.

The following table summarizes the applicant's PSD applicability for the project.

Table 2. Applicant's PSD Applicability Analysis, Revised

Pollutant	Emissions for Temporary Trial, tons/year		Subject to PSD?
	Increase	Significant Emissions Rate	
CO	-9.9	100	No
NO _x	-39.2	40	No
PM	17.5	25	No
PM ₁₀	12.1	15	No
PM _{2.5}	5.4	10	No
SO ₂	2.4	40	No
VOC	3.7	40	No
Hg	-6.8 lb ^a	200 lb/year	No
Pb	4 lb ^b	1200 lb/year	No

Notes:

- The current permit limits mercury emissions to less than 97 pounds, which is less than the PSD significant emissions rate.
- Previous tests on cement kilns indicate that 99.7% or more of the lead is retained in the cement clinker.^{2,3}
- With regard to particulate matter with a mean particle diameter of 2.5 microns or less (PM_{2.5}), the Department adopted by reference the federal ambient air quality standard for PM_{2.5}, but has not yet promulgated the implementing regulations for PSD preconstruction review (e.g., define PM_{2.5} as a PSD pollutant with a significant emission rate for PSD applicability). The Department is in the process of completing a rulemaking action to implement this remaining piece of the PM_{2.5} program.
- The increase includes the temporary shredder/screening operations.

As shown in the above table, total project emissions are not expected to exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

3. DEPARTMENT REVIEW

Applicant's Project Objective

In response to the economic downturn and newly proposed regulations, the Branford Cement Plant is seeking to

² "Hazardous Waste Combustion in Industrial Processes: Cement and Lime Kilns", EPA document EPN/600/S2-87/095, February 1988.

³ "Use of Cement Kilns in Managing Solid and Hazardous Wastes: Implementation in Australia Heart", Sunil, Griffith University, 1994.

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develop alternative fuel materials that will displace coal and fly ash to lower operating costs and eventually reduce mercury emissions.

Operating Capacity and Production

According to the Portland Cement Association, cement production in Florida was more than 12 million tons in 2006 and has dropped each year to a low of just over 4 million tons in 2009. In addition to preventing the construction of several of the new kilns, this situation has caused the shutdown of recently constructed and existing kilns. The Branford Cement Plant began operation in 2005 and has a maximum permitted Portland cement production capacity of 965,425 tons of clinker per year. Cement production peaked in 2007 at approximately 845,000 tons per year of clinker (88% capacity), but dropped to 675,000 tons in 2008 (70% capacity) and then to 385,000 tons in 2009 (40% capacity) with a downturn in the economy. Currently, the plant operates when there is sufficient product demand, but is otherwise idle.

The pre-calciner at the entrance to the kiln was specifically designed to accept alternative materials for use as fuels or ingredients. In particular, the original permit authorized the use of power plant fly ash as an alternative fuel and ingredient, which is common for the industry and can improve the overall strength of the cement product. Alternative materials are introduced pneumatically into the pre-calciner through a six-inch diameter duct.

The increase in the amount of alternative fuel materials does not increase emissions significantly as shown in Table 2. Mixing the proposed alternative fuel allows the plant to develop a fuel that meets the temperature and flame characteristic requirements of the kiln. SAC will work with its supplier(s) to continuously improve the quality of the engineered fuel material based on SAC's fuel requirements.

Summary of Cement Kiln Emissions

Other applicants requesting to use alternative fuels in kilns have submitted data regarding the use of alternative fuels in Europe. The European Commission created a summary report⁴ of the emissions data from cement kilns in over 23 European countries. The report provides summaries of the relative emissions differences from firing a broad range of alternative fuels at replacement rates of greater than 40 percent heat input to the kiln. A review of the summaries is in the table below.

Table 3. European Kilns Pollutant Emissions

Pollutant	0% Substitution	40 % Substitution	Change in Emissions
PM	0.0183 gr/dscf	0.0091 gr/dscf	50% decrease
SO ₂	80.6 ppm	62.8 ppm	22% decrease
NO _x	499.9 ppm	283.9 ppm	43% decrease
TOC	16.7ppm	14.7 ppm	12% decrease

Note: About 90% of the kilns represented in the summaries are dry process kilns with most re-circulating the dust collected by the control equipment similar to the Branford cement kiln.

In addition, a study⁵ supported by the CEMA FOUNDATION (Spanish Cement Association (OFICEMEN) and the two main trade unions in Spain (FECOMA-CCOO and MCA-UGT)) examined cement kiln emissions and the possible health effects on people living near cement plants. After analyzing the risk indices related to the receptors living close to the cement plants, focusing on the exposure by inhalation and ingestion of the soil and fruit and vegetables growth around the studied area, the results demonstrated that there is no significant health risk. Other studies support these findings, for example, the United Kingdom Public Health Agency stated, "There will consequently be little change in the pollution levels in the air that people breathe as this is largely determined

⁴ Cement, Lime and Magnesium Oxide Manufacturing Facilities, May 2010, Tables 1.24, 1.32, 1.25, 1.38, <http://eippcb.jrc.ec.europa.eu>

⁵ "Emissions and their Possible Environmental and Health in the Surroundings of Cement Plants, Effects", URS-Espana

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by other sources such as traffic. We are unaware of any evidence that burning substitute fuel (in cement kilns) has caused adverse health effects.”⁶

Applicability of Federal Regulations for Portland Cement Plants

NSPS Subpart F in 40 CFR 60 - Portland Cement Plants

This federal regulation applies to all Portland cement plants constructed, reconstructed or modified after August 17, 1971. Except as provided in paragraphs 40 CFR 63.1356(a)(1) and (a)(2), any affected source subject to the provisions of Subpart LLL in 40 CFR 63 (MACT for Portland Cement Plants) is exempt from any otherwise applicable new source performance standard contained in 40 CFR Part 60, Subpart F. The Branford Cement Plant is subject to NESHAP Subpart LLL.

NSPS Subpart Eb – Large Municipal Waste Combustors

This federal regulation applies to municipal waste combustors for which construction is commenced after September 20, 1994 or for which modification or reconstruction is commenced after June 19, 1996. This regulation could apply to cement kilns or boilers firing certain non-traditional solid fuels defined as municipal solid waste. However, 40 CFR 60.50b(p) of this regulation specifically states that, “Cement kilns firing municipal solid waste are not subject to this subpart.”

NSPS Subpart CCCC Commercial and Industrial Solid Waste Incineration (CISWI) Units

First promulgated on December 1, 2000, this federal regulation applies to municipal waste combustors for which construction is commenced after November 30, 1999 or for which modification or reconstruction is commenced on or after June 1, 2001. This regulation could apply to cement kilns or boilers firing certain non-traditional solid fuels defined as municipal solid waste. However, as promulgated in 2000, 40 CFR 60.2020(l) specifically provides that cement kilns regulated under NESHAP Subpart LLL in 40 CFR 63 (MACT for Portland Cement Plants) are exempt from compliance with the CISWI rules under NSPS Subpart CCCC. The Branford Cement Plant is subject to NESHAP Subpart LLL.

On March 21, 2011, EPA revised NSPS Subpart CCCC and the new Subpart CCCC requirements became effective on May 20, 2011. However, the 2011 version applies only to new, modified or reconstructed units, which are defined as units constructed after June 2010. EPA’s preamble specifically provides that only “incinerators” and “small remote incinerators” remain subject to the standards in the 2000 NSPS Subpart CCCC rules. EPA also states that CISWI units falling within other subcategories, including cement kilns, “... will not in any case ...” be subject to the 2000 NSPS Subpart CCCC standards.

Also, in the 2011 version of NSPS Subpart CCCC, new, modified, reconstructed cement kilns will not be exempt from the new CISWI rules. Paragraph (l) of 40 CFR 60.2020 that established the exemption from NSPS Subpart CCCC is now marked “reserved.” Waste-burning cement kilns constructed prior to June 4, 2010 are not considered to be “new” units subject to the 2011 NSPS Subpart CCCC standards *unless they are subsequently modified or reconstructed*. However, as described below, EPA also promulgated new solid waste definitions to clarify that some solid waste materials may be processed to qualify as legitimate alternative fuels and ingredients, which would not subject the cement kiln to NSPS Subpart CCCC.

NSPS Subpart DDDD - Emissions Guidelines and Compliance Times for CISWI Units

This federal regulation establishes “emission guidelines” and compliance schedules for the control of emissions from existing CISWI units. This NSPS does not establish standards that apply directly to emission units because the NSPS standards are developed to apply to new units. The emissions guidelines are established for states to develop rules that regulate emissions from existing CISWI units. The 2000 version of Subpart DDDD specifically exempts cement kilns.

Under the 2011 version of Subpart DDDD, waste-burning cement kilns that were constructed after November 30,

⁶ http://www.dh.gov.uk/ab/COMEAP/DH_108498

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1999, and before June 4, 2010, will be required to comply with the standards and requirements for “existing units” established under the emissions guidelines as implemented by the state. The rules require state plans to be submitted by March 21, 2012 for CISWI units other than incinerator units (e.g., waste-burning kilns) that commenced construction on or before June 4, 2010. The compliance deadline is three years after the effective date of EPA’s approval of the state plan, but no later than March 21, 2016. Florida has not yet incorporated the revised emissions guidelines into its rules. For these waste-burning kilns, the standards in Table 8 of Subpart DDDD will apply once Florida adopts the rule and puts in place the approved plan or delegation. Currently, there is no mechanism for applicability of the 2011 version of Subpart DDDD in Florida for waste-burning kilns or a deadline for compliance with the applicable requirements under Subpart DDDD for waste-burning kilns. These issues must be resolved when Florida completes rulemaking to implement the 2011 version of Subpart DDDD through a state plan approved by EPA or direct delegation from EPA.

Vacatur of the CISWI Definitions Rule

A federal Court vacated EPA’s CISWI Definitions Rule and remanded it to EPA for new rulemaking that would identify which secondary materials are nonhazardous “solid waste” for purposes of subtitle D (non-hazardous waste) of the RCRA when burned in a combustion unit. See *Federal Register Volume 75, No. 174, Thursday, September 9, 2010, Rules and Regulations and Volume 75, Page 31844, June 4, 2010.*

The revised definitions will determine the applicability of Clean Air Act (CAA) Section 129(a) for any combustion unit that burns any non-hazardous secondary material that is considered to be a solid waste. When EPA developed the NSPS Subpart CCCC and Emissions Guidelines Subpart DDDD provisions, there was no Federal regulatory interpretation of “solid waste” for EPA to apply under Subtitle D of RCRA for purposes of CAA section 112 and 129. During the NSOS rulemaking, EPA did not prejudice the outcome of the recently proposed non-hazardous solid waste rulemaking. EPA therefore did not determine whether or not non-hazardous secondary materials combusted by cement kilns were to be classified as solid wastes. Accordingly, EPA based all NSPS determinations as to source classification on the emissions information that was available at that time, as required by CAA section 112(d)(3). Therefore, the current data base classifies all Portland cement kilns as CAA section 112 sources (*i.e.*, subject regulation under CAA section 112) regardless of the fuel currently being fired.

40 CFR 241 - Non-Hazardous Discarded Materials That Are Solid Waste When Used as a Fuel or Ingredient

When EPA updated the CISWI rules (NSPS Subpart CCCC provisions and the Emission Guidelines in Subpart DDDD), it also changed the definition of solid waste used in the rules to conform with the definition of solid waste under the Resource Conservation and Recovery Act (RCRA), “... any distinct operating unit of any commercial or industrial facility that combusts any solid waste as that term is defined in 40 CFR Part 241 [RCRA]...” In 40 CFR 241.3(b), the new RCRA definitions specify that the following non-hazardous secondary materials *are not* solid wastes when combusted:

- Non-hazardous secondary materials used as a fuel in a combustion unit that remain within the control of the generator and that meet the legitimacy criteria specified in paragraph (d)(1) of this section.
- The following non-hazardous secondary materials that *have not been discarded and* meet the legitimacy criteria specified in paragraph (d)(1) of this section when used in a combustion unit (by the generator or outside the control of the generator):
 - Scrap tires used in a combustion unit that are removed from vehicles and managed under the oversight of established tire collection programs.
 - Resinated wood used in a combustion unit (Resinated wood means wood products containing resin adhesives derived from primary and secondary wood products manufacturing such as items as board trim, sander dust, and panel trim).

The “legitimacy criteria” for non-hazardous secondary materials:

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- The non-hazardous secondary material must be managed as a valuable commodity based on the following factors:
 - The storage of the non-hazardous secondary material prior to use must not exceed reasonable time frames;
 - Where there is an analogous fuel, the non-hazardous secondary material must be managed in a manner consistent with the analogous fuel or otherwise be adequately contained to prevent releases to the environment;
 - If there is no analogous fuel, the non-hazardous secondary material must be adequately contained so as to prevent releases to the environment;
- The non-hazardous secondary material must have a meaningful heating value and be used as a fuel in a combustion unit that recovers energy.
- The non-hazardous secondary material must contain contaminants at levels comparable in concentration to or lower than those in traditional fuels which the combustion unit is designed to burn. Such comparison is to be based on a direct comparison of the contaminant levels in the non-hazardous secondary material to the traditional fuel itself.

Although the Florida has not yet adopted these federal definitions, the alternative fuels requested by SAC appear to meet the legitimacy criteria by being managed as a valuable commodity (i.e., fuel), having a useful heating value (displaces coal as a pre-calciner fuel) and containing contaminants comparable to traditional fuels (e.g., coal).

Reconsideration Action on Cement NESHAP (Excerpts)

When EPA proposed the revised Portland Cement NESHAP, it classified all cement kilns, including those burning secondary materials, as "cement kilns" for the NESHAP rulemaking, and explained why it was doing so. The EPA discussed the interplay between the cement kiln NESHAP and the forthcoming rules for incinerators which burn solid waste, noting that "some Portland cement kilns combust secondary materials as alternative fuels" (74 FR at 21138). The EPA then stated that because there was no regulatory definition of solid waste that would distinguish which of these alternative fuels burned by cement kilns were wastes and which were not, the EPA would therefore classify all of the units as cement kilns. *Id.* The EPA reasoned that unless and until the Agency adopts a definition of solid waste classifying the alternative fuels, cement kilns burning secondary materials as fuels or otherwise using secondary materials are lawfully classified as cement kilns and rules for cement kilns therefore would apply to them.

The EPA further found that combustion of secondary materials as alternative fuels by cement kilns "did not have any appreciable effect on the amount of hazardous air pollutants (HAP) emitted by any source." *Id.* The record for the proposed rule included an inventory of every material burned by a large group of cement kilns over a 30-day period, including all of those comprising the pool of best performers for mercury.

A "secondary material" is a material that can potentially be classified as a solid waste under RCRA when recycled (50 FR 616 n. 4 (Jan. 4, 1985)). Under the newly adopted regulatory definition of solid waste, secondary materials encompass "any material that is not the primary product of a manufacturing or commercial process, and can include post-consumer material, off-specification commercial chemical products or manufacturing chemical intermediates, post-industrial material, and scrap (40 CFR section 241.2).

As noted earlier, all cement kilns certified to EPA that they were cement kilns in compliance with the applicable section 112 (d) standards for cement kilns up to and through the time of the amendments to the Portland Cement NESHAP. Thus, cement kilns burning alternative fuels or other secondary materials were not classified as incinerators during the cement NESHAP rulemaking, but as cement kilns. Therefore, the Portland Cement NESHAP was, and is, based exclusively on the performance of cement kilns, as properly classified at the time of the rulemaking.

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NESHAP Subpart LLL in 40 CFR 63 - Portland Cement Manufacturing Industry

This federal MACT applies to all new and existing Portland cement plants at major and area sources. The affected source includes the kiln, which is defined as a device that includes the preheater tower, precalciner and raw mill. The Branford Cement Plant is subject NESHAP Subpart LLL (Portland Cement MACT), which is adopted by reference into Rule 62-204.800, F.A.C. By being subject to Subpart LLL, the kiln is specifically exempt from compliance with the requirements of NSPS Subpart F, Standards of Performance for Portland Cement Plants, in 40 CFR 60.60 – 60.66.

In 2010, EPA revised this federal rule for which the revisions will take effect in 2013. The Portland Cement MACT establishes emission standards that must be met and does not limit the types of non-hazardous materials that can be used as fuels or ingredients in the kiln. It does not prohibit the use of non-hazardous discarded materials, municipal solid waste, refuse-derived waste, or any other form of solid waste as a fuel. The MACT standards specify the following HAP emissions standards applicable to the Branford Cement Plant:

- Mercury: 55 lb/million tons of clinker produced
- PM: 0.04 lb/ton clinker(as a surrogate for metals such as cadmium and lead)
- THC: 24 ppmv (as a surrogate for other organic HAP emissions)
- HCl: 3 ppmv

Compliance with the new standards requires continuous monitoring methods. Although this NESHAP is final, EPA is currently reconsidering portions and it will likely be challenged by industry as well as environmental groups.

Identification of Non-Hazardous Materials That Are Not Solid Waste – State Regulations

According to 403.7045(1)(f), F.S., the following are considered “industrial byproducts” and not solid wastes, if:

- A majority of the industrial byproducts are demonstrated to be sold, used, or reused within one year.
- The industrial byproducts are not discharged, deposited, injected, dumped, spilled, leaked, or placed upon any land or water so that such industrial byproducts, or any constituent thereof, may enter other lands or be emitted into the air or discharged into any waters, including groundwater, or otherwise enter the environment such that a threat of contamination in excess of applicable department standards and criteria or a significant threat to public health is caused.
- The industrial byproducts are not hazardous wastes as defined under 403.703, F.S. and rules adopted under this section.

Based on this rationale, the proposed alternative fuel materials are industrial byproducts or have specific exemptions from solid waste permitting. Non-chlorinated plastics and agricultural fibrous organic byproducts have agricultural exemptions from solid waste rules. Reject roofing shingles and used roofing shingle scraps include raw material needed by the cement kiln. Tire-derived fuel has exemptions from solid waste permitting. Clean woody biomass is exempt from solid waste permitting. Pre-consumer reject paper, post-consumer paper carpet-derived fuel, a blended mix of the above alternative fuels and an engineered fuel are considered industrial byproducts, which are not solid wastes.

Removing Test Requirements

- The requirement for metals stack testing was removed because current information indicates that metals in the alternative fuels will be comparable to or less than coal.
- The analytical data obtained from the samples of non-chlorinated agricultural plastics show no detectable pesticides or very low levels. This is likely because newer pesticides are biodegradable and quickly break down after use. The long residence time at high temperatures will destroy any pesticide residue. Due to the very low levels present, the requirement for stack testing was removed.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- The permit initially required HCL and D/F testing if the chlorine content of the alternative fuels was more than 0.2%, but there is additional information supporting the effective scrubbing of HCl emissions by the limestone and that D/F are destroyed at high temperatures above 1400° F and are not reformed if rapidly cooled and maintained below 400° F⁷. A study, Air Emissions Data Summary for Portland Cement Pyroprocessing Operations, Portland Cement Association, 2008⁸, shows D/F emissions are related to the type of kiln. In response to the 2002 MACT standards, the cement kilns conducted D/F emission tests, and many kiln operators learned to reduce the inlet temperature to the air pollution control systems to suppress formation of D/F compounds. Due to this change in operating conditions, D/F emissions in the cement industry have decreased significantly since the 2002 compliance date of the MACT standard for kilns subject to Subpart LLL. The preheater/precalciner kiln design for SAC provides this cooling and the plant continuously monitors the temperature to the baghouse inlet as an indicator of effective D/F control.
- The requirement for demonstrating that used roofing shingle scraps do not contain asbestos has been changed to refer to the requirements in Subpart M of 40 CFR 61. Previously the permit required determination by the polarized light microscopy (PLM) method, but any appropriate method specified in Subpart M of 40 CFR 61 is acceptable.

Removing PSD Reporting

The initial permit required annual reporting of emissions pursuant to Rules 62-212.300(1)(e) and 62-210.370, F.A.C. However, this requirement only applies when a facility makes a permanent physical change or change in the method of operation. Reporting must occur for the first full year of operation after making the change. Since this permit only authorizes a short-term, limited, temporary trial this reporting cannot be done. However, the permit does require a report on emissions from the trial burn and the current Title V air operation permit requires submittal of an Annual Operating Report of the annual emissions from the kiln.

4. CONCLUSION

The short-term trial burns will allow the plant to determine whether it is feasible to handle and fire each alternative fuel material and to develop QA/QC procedures for receiving, handling and firing each alternative fuel material. The alternative fuels are limited in amounts and each will be fired over a maximum of 90 operational days. Actual emissions from firing the alternative fuels must comply with all existing valid permit limits and are not expected to increase significantly above the current emission levels. Based on reasonable assurance provided by the applicant, the project:

- Will not result in significant emissions increases requiring PSD preconstruction review, and
- Will not violate the terms and conditions of the current Title V air operation permit.

A revised draft permit will be issued to authorize and regulate the short-term trials of alternative fuel materials.

5. 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 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, project engineer, reviewed the application and prepared the draft permit documents. Jeff Koerner, program administrator, provided technical input for the project and assisted in editing the draft permit documents. 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.

⁷ EPA Course No. Re-100, "Basic Concepts in Environmental Sciences"; Module 6: Air Pollutants and Control Techniques - Dioxins and Furans; <http://www.epa.gov/apti/bces/index.htm>.

⁸ "Air Emissions Data Summary for Portland Cement Pyroprocessing Operations", Richards, John; Goshaw, David; and Holder, Tom, Portland Cement Association, PCD R&D SN3048, 2008.

DRAFT PERMIT

PERMITTEE

Suwannee American Cement, LLC
5117 U.S. Highway 27
Branford, Florida 32008

Authorized Representative:
Mr. Tom Messer, Plant Manager

Air Permit No. 1210465-022-AC
Permit Expires: December 12, 2014

Branford Cement Plant
Revision to Alternative Fuel Trials

PROJECT

Suwannee American Cement, LLC operates an existing Portland cement plant, which is 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 kilometers (km) East and 3315.9 km North.

This final air construction permit revises Permit No. 1210465-020-AC, which authorizes trial burns for non-chlorinated plastics, tire-derived fuel, reject roofing shingles, used roofing shingle scraps, clean woody biomass, agricultural fibrous organic byproducts, pre-consumer reject paper, post-consumer paper and carpet-derived fuel. This project adds alternative fuel mixes and engineered fuel. This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project 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.

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

(Signature)

(Date)

(Printed Name of Above Designee)

DRAFT PERMIT

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 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 _____ to the persons listed below.

cc: Mr. Tom Messer, Suwannee American Cement, LLC (tomm@vcsmc.com)
Mr. Celso Martini, VCSMC (celsom@vcsmc.com)
Mr. Joe Horton, VCSMC (jbhorton@vcnainc.com)
Mr. Krishna Cole, Suwannee American Cement, LLC (krishnac@vcsmc.com)
Mr. Max Lee, Ph.D., P.E., K&A (mlee@kooglerassociates.com)
Mr. Chris Bird, Director of Alachua County Department of Environmental Regulation (chris@alachuacounty.us)
Ms. December McSherry (lmcsh2001@aol.com)
Ms. Annette Long, Save Our Suwannee, Inc. (long5892@bellsouth.net)
Mr. Thomas Ellison, (dmot51@aol.com)
Chair, Suwannee County Board of County Commissioners (commissioners@suwcounty.org)
Chair, Alachua County Board of County Commissioners (bocc@alachuacounty.us)
Mr. Greg Strong, DEP Northeast District (greg.strong@dep.state.fl.us)
Mr. Chris Kirts, DEP Northeast District (christopher.kirts@dep.state.fl.us)
Ms. Kathleen 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.

DRAFT

(Clerk)

(Date)

SECTION 1. GENERAL INFORMATION - DRAFT

FACILITY DESCRIPTION

The existing facility consists of a Portland cement manufacturing plant, the associated quarry, and raw material and cement handling operations. The plant combines raw materials and utilizes a preheater/calciner kiln system with in-line mill to produce cement clinker. The kiln fires coal as the primary fuel. The clinker is milled and combined with gypsum to produce Portland cement. The existing plant has a capacity of 210 tons per hour of dry preheater feed materials, 120 tons per hour of clinker production, and 150 tons per hour of Portland cement production. Annual production is limited to the following 12-month rolling totals: 1,648,578 tons per year of dry preheater feed materials; 965,425 tons per year of clinker production; and 1,191,360 tons per year of Portland cement production. Certified continuous emissions monitoring systems (CEMS) measure and record emissions of nitrogen oxides (NO_x reported as NO₂), sulfur dioxide (SO₂) and total hydrocarbons (THC as a surrogate for volatile organic compounds (VOC)). A certified continuous opacity monitoring system (COMS) measures and records the stack opacity as a surrogate for particulate matter (PM). Process monitors measure and record emissions of carbon monoxide (CO).

PROPOSED PROJECT

This permit authorizes temporary short-term trials to co-fire coal with each of the following alternative fuel materials in the existing cement kiln to gather operational and emissions data: non-chlorinated plastics, tire-derived fuel, reject roofing shingles, used roofing shingle scraps, biomass, agricultural fibrous organic byproducts, pre-consumer reject paper, post-consumer paper, carpet-derived fuel alternative fuel mixes and engineered fuel. This authorization is only for the temporary trials as conditioned by the permit to determine the operational viability of each fuel, the impacts on emissions and the effect on cement quality. The information will be used to determine whether a material is suitable as alternative fuel for co-firing with coal in the cement kiln, which may require additional testing. To obtain permanent authorization for any of the alternative fuel materials, the permittee must submit an additional application and obtain an air construction permit. The information gathered during the trial burn period may be used to support such an application or a project for a longer trial.

This project will affect the following existing permitted emissions unit.

Facility ID No. 1210465	
ID No.	Emission Unit Description
004	Kiln No. 1 pyroprocessing system

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.
- 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.

SECTION 2. ADMINISTRATIVE REQUIREMENTS - DRAFT

1. Permitting Authority: All documents related to PSD applications for permits to construct or modify emissions units shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to construct minor sources of air pollution or to operate the facility shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Criteria for Material Suppliers); and Appendix E (Documentation for Used Roofing Shingle Scraps).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
7. Source Obligation:
 - (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
 - (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.[Rule 62-212.400(12), F.A.C.]
8. ~~Actual Emissions Reporting: This permit is based on an analysis that compared baseline actual emissions with projected actual emissions and avoided the requirements of subsection 62-212.400(4) through (12), F.A.C. for several pollutants. Therefore, pursuant to Rule 62-212.300(1)(e), F.A.C., the permittee is subject to the following monitoring, reporting and recordkeeping provisions:~~

SECTION 2. ADMINISTRATIVE REQUIREMENTS - DRAFT

- a. ~~The permittee shall monitor the emissions of any PSD pollutant that the Department identifies could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change. Emissions shall be computed in accordance with the provisions in Rule 62-210.370, F.A.C., which are provided in Appendix C of this permit.~~
- b. ~~The permittee shall report to the Department within 60 days after the end of each calendar year during the trial period setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:~~
- ~~1) The name, address and telephone number of the owner or operator of the major stationary source;~~
 - ~~2) The annual emissions calculations pursuant to the provisions of 62-210.370, F.A.C., which are provided in Appendix C of this permit;~~
 - ~~3) If the emissions differ from the preconstruction projection, an explanation as to why there is a difference; and~~
 - ~~4) Any other information that the owner or operator wishes to include in the report.~~
- c. ~~The information required to be documented and maintained pursuant to subparagraphs 62-212.300(1)(e)1 and 2, F.A.C., shall be submitted to the Department, which shall make it available for review to the general public.~~

~~For this project, the permit requires the annual reporting of actual emissions from the cement kiln for the following pollutant: CO based on data from the existing process monitor; NO_x reported as NO₂ based on data from the existing CEMS; SO₂ based on data from the existing CEMS; VOC based on data from the existing THC monitor; mercury (Hg) based on material balance and data from the CEMS required by this permit; and PM and lead (Pb) based on stack test data.~~

~~[Application 1210465-020-AC; and Rules 62-212.300(1)(e) and 62-210.370, F.A.C.]~~

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

A. Kiln 1 System – Short-Term Trial of Miscellaneous Alternative Fuel Materials

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
004	Kiln No. 1 pyroprocessing system

COMPLIANCE WITH EXISTING PERMIT CONDITIONS

1. Existing Permits: This permit supplements all existing valid air permits. The permittee shall continue to comply with all applicable conditions from valid air construction and operation permits. [Rule 62-4.070(3), F.A.C.]

EQUIPMENT

2. Temporary Equipment: The permittee is authorized to temporarily install and operate the following equipment for the trial: a Schenk feeder system or equivalent to measure and dose alternative fuel materials through the existing fly ash injection feed lines; an electric or diesel-powered shredder (approximately 400 hp); an electric or diesel-powered screener (approximately 100 hp); a hopper; a conveyor; ductwork; and other miscellaneous equipment to unload, store and handle the alternative fuel materials. If not electrically powered, only diesel fuel shall be fired in the engines powering the shredder and screen. The ~~Schenk~~ feeder system shall be integrated with the operation and monitoring system currently in use in the operator control room and tied into the existing Data Retrieval System. There shall be a visible display of the alternative material feed rate at the ~~Schenk~~ feeder system as well as in the operator control room. The alternative material feed rate shall be recorded along with the other fuel and material feed rates. [Application No. 1210465-020-AC and Rule 62-4.070(3), F.A.C.]

PERFORMANCE RESTRICTIONS

3. Authorization: The permittee is authorized to conduct a short-term operational trial for each of the following alternative fuel materials. Each alternative fuel trial is limited to no more than ~~30~~ 90 operating days while co-firing coal. Each alternative fuel material shall be tested separately from other alternative fuel materials. Only one alternative fuel material at a time shall be co-fired with coal.
 - a. Non-Chlorinated Agricultural Plastics: This material consists of non-chlorinated plastics, for example, low density polyethylene (LDPE) and high density polyethylene (HDPE) plastic used primarily in agricultural and silvicultural operations to prevent weed growth, control soil erosion and moisture exposure. No more than ~~1,250~~ 3,000 tons shall be fired in the kiln.
 - b. Tire-Derived Fuel (TDF): This material consists of shredded used tires and may have steel belt material. No more than 1,500 tons shall be fired in the kiln. It also includes tire fluff, which is the shredded materials from the crumb of tires with no metal.
 - c. Manufacturer Reject Roofing Shingles: This material shall consist of manufacturer reject shingles that were never installed and which the manufacturer certifies as being “asbestos free”. The bulk of the incombustible grit material shall be removed from the shingles prior to delivery. No more than 4,000 tons shall be fired in the kiln.
 - d. Used Roofing Shingle Scraps: This material consists of a combination of used shingles from residential roof replacements (“tear-off”), leftover material new from shingle production (“roofing shingle tabs”) and minimal roofing debris. The bulk of the incombustible grit material shall be removed from the shingles prior to delivery to improve burnability. The residual incombustible materials serve as raw materials. Used roofing shingle scraps shall contain no asbestos fibers as determined by polarized light microscopy (PLM) method or equivalent method in 40 CFR 61, Subpart M. No more than 4,000 total tons shall be fired in the kiln.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

A. Kiln 1 System – Short-Term Trial of Miscellaneous Alternative Fuel Materials

- e. *Clean Woody Biomass*: This material will include clean untreated lumber, tree stumps, tree limbs, slash, bark, sawdust, sander dust, wood chips scraps, wood scraps, wood slabs, wood millings, wood shavings, and processed pellets made from wood or other forest residues. This material excludes copper-chromium-arsenic (CCA)-treated wood, creosote-treated wood, construction and demolition (C&D) debris, plywood, particle board, medium density fiberboard, oriented strand board, laminated beams, finger-jointed trim and sheet goods. No more than 4,000 tons shall be fired in the kiln.
- f. *Agricultural Organic Fibrous Byproducts*: This material includes peanut hulls, rice hulls, corn husks, citrus peels, cotton gin byproducts, animal bedding, etc. Other similar types of materials may be tried with prior written approval of the Department. No more than 5,000 tons of any single type of agricultural organic fibrous byproduct shall be fired in the kiln. Only one type of agricultural byproduct material shall be stored on site at any given time. No more than 25,000 total tons of agricultural organic fibrous byproducts shall be fired in the kiln.
- g. *Pre-Consumer Paper*: This material consists of pre-consumer: printing and writing paper; household and sanitary paper; wrapping and packaging paper; paper board; chipboard; Kraft liner, writing and packaging paper; fluting; other wrapping and packaging paper; folding boxboard; other paperboard; polymer laminated wrapping paper; game boards and boxes; foil wrapping paper; thermal papers; specialty papers for filtration or hygienic applications; adhesive labels; waxed corrugated cardboard; and other miscellaneous coated papers. This group of materials also includes fabrics and textiles such as dyed/finished natural fibers, dyed/finished natural fiber woven/scrap trim, polymer fiber woven scrap trim, and un-dyed/unfinished natural or synthetic fiber scrap trim. No more than ~~3,500~~ 5,000 tons shall be fired in the kiln.
- h. *Post-Consumer Paper*: This material will be provided by Materials Recovery and Recycling Facilities (MRRF) and consists primarily of used, mixed office paper that is too costly to separate for recycling. No more than ~~3,500~~ 5,000 tons shall be fired in the kiln.
- i. *Carpet-Derived Fuel*: This material consists of *shredded used carpet (rejects, new or used)*. No more than ~~2,500~~ 6,500 tons shall be fired in the kiln.
- j. *Alternative Fuel Mix*: Subject to the individual limits on material quantities, alternative fuels for which all required sampling/analysis and stack tests (if necessary) have been conducted and satisfactory results obtained may be blended and fired as a separate alternative fuel trial. Prior to conducting this trial, SAC shall notify the Department and provide the Department with a test plan that specifies the length of testing (not to exceed 90 days) and expected quantities of materials to be consumed.
- k. *Engineered Fuel*: This material consists of a mix of non-hazardous materials or wastes such as wood, paper, plastic, fabrics, carpet and foams. This material is a product of targeted recycle and recovery of materials from construction and demolition debris. The material has been developed as a dry, high energy, clean burning fuel material for use at the Branford cement plant with the bulk of incombustible materials removed to improve burnability. Production of this alternative fuel from the source material involves selective collection followed by the use of state of the art separation processes that include the use of magnetic, density, screening and hand sorting techniques. During the test trial no more than 5,000 tons shall be fired in the kiln.
- l. *Expiration and Revocation*: Authorization to fire each alternative fuel material expires with this permit, at the end of ~~30~~ 90 operating days of firing the alternative fuel or when permitted amount of material has been fired. The Department may require the trial of an alternative fuel material to stop if:
- a) The permittee accepts alternative fuel material that does not meet the acceptance criteria based on analytical results provided by the material suppliers.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

A. Kiln 1 System – Short-Term Trial of Miscellaneous Alternative Fuel Materials

- b) The analytical results of samples taken by the plant vary widely with those provided by the material suppliers.
- c) The firing of an alternative fuel material causes frequent upsets to kiln operation resulting in non-steady state operation; or
- d) The pyroprocessing kiln is unable to comply with the emissions standards in the Title V air operation permit.

[Application No. 1210465-020-AC and Rule 62-4.070(3), F.A.C.]

- 4. Material Suppliers: Suwannee American Cement shall provide each material supplier with a copy of this air construction permit including the Appendix D (Criteria for Material Suppliers) and, for suppliers of Used Roofing Shingle Scraps, Appendix E (Documentation for Used Roofing Shingle Scraps). [Rule 62-4.070(3), F.A.C.]
- 5. Accepting Shipments of Alternative Fuels:
 - a. The permittee shall obtain the analytical results of an alternative fuel material prior to, or along with the first delivery of the alternative fuel material. The permittee shall record the amount and type of each material received.
 - b. The permittee shall receive alternative fuel materials only in covered trucks (approximately 20 tons per truckload).
 - c. The alternative fuel materials shall be unloaded to a paved area or compacted clay surface and stored under cover in separate piles. Optionally, the materials may be stored in enclosed trailers. No more than 5,000 tons of agricultural organic fibrous byproducts shall be stored on site at any given time. The permittee shall obtain copies from the material supplier of manufacturer certifications, analytical results and the amount (tons) for each delivery. A delivery may consist of more than one truckload. Based on the analytical results provided by the material supplier, the permittee shall only accept used roofing shingle scraps that contain no asbestos fibers as determined by the PLM method. See Appendix D (Criteria for Material Suppliers) and Appendix E (Documentation for Used Roofing Shingle Scraps) of this permit for material processing procedures.
 - d. Unless otherwise authorized by the Division of Air Resource Management, alternative fuel materials delivered to the site shall be burned in the kiln during the trial or removed from the site within 30 days of completing the trial.
 - e. Based on the analytical results, the permittee shall only accept used roofing shingle scraps that contain no asbestos fibers as determined by PLM or other equivalent method specified in Subpart M of 40 CFR Part 61.

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

- 6. Fugitive Dust: To prevent fugitive dust caused by any alternative fuel materials from leaving the property, the plant shall apply water if necessary; otherwise, the material shall be kept dry to facilitate burning. [Rule 62-4.070(3), F.A.C.]
- 7. Operation: Alternative fuel materials shall only be fired when the kiln has achieved stable operation, temperatures and production. Alternative fuel materials shall not be fired during startup, shutdown, malfunction, or other non-steady state operation or when the raw mill is down. [Rule 62-4.070(3), F.A.C.]
- 8. Capacity: During each designated trial, an alternative fuel material may be co-fired with coal in the existing cement kiln at the following approximate maximum rates:

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

A. Kiln 1 System – Short-Term Trial of Miscellaneous Alternative Fuel Materials

Material	Estimated Maximum Firing Rates (tons/hour)
Non-Chlorinated Agricultural Plastics	4
Tire Derived Fuel	4.5
Roofing Shingles	12
Clean Woody Biomass	14
Agricultural Byproducts	25
Paper	11
Carpet Derived Fuel	7.5
<u>Alternative Fuel Mix</u>	<u>10</u>
<u>Engineered Fuel</u>	<u>10</u>

{Permitting Note: Since the Schenck feeder system is limited by volumetric throughput, the maximum mass feed rates will also be variable based on the material densities. Each trial will be used to determine the maximum sustainable mass feed rate of each alternative fuel material.} [Application No. 1210465-020-AC and Rule 62-210.200(PTE), F.A.C.]

- 9. Re-Processing: If problems with feeding alternative fuel materials occur during the trial period, the permittee is authorized to re-shred and screen the alternative fuel materials to obtain a more desirable size and remove incombustible materials. Used roofing shingle scraps shall not be re-processed. The shredding and screening operations shall be equipped with a water spray system to control fugitive dust emissions only if necessary; otherwise, the material shall be kept dry to facilitate burning. Once it is determined that re-processing on site is necessary, the permittee shall contact the material suppliers and adjust the material specifications and processing requirements as necessary to reduce re-processing at the Branford Cement Plant. The permittee shall provide advance notice to the Compliance Authority that re-processing equipment will be brought on site. [Rule 62-4.070(3), F.A.C.]
- 10. Sampling/Analyses: ~~At least once every four hours while firing an alternative fuel material, the permittee shall take a grab sample of as-fired material (approximately one gallon) from the front loader bucket before being dumped into the feed bin of the Schenck feeder system. At the end of each day, the grab samples shall be thoroughly mixed and a composite sample made (approximately 2 lb). Each representative composite sample shall be analyzed for the following: heating value, moisture, density, volatiles, ash, sulfur, chlorine, fluorine and metals (including arsenic, cadmium, chromium, copper, lead and mercury). The composite samples for non-chlorinated agricultural plastics shall also be analyzed for pesticides, bromine and thallium. The composite samples for TDF shall also be analyzed for zinc. The composite samples for manufacturer reject roof shingles and roofing shingle scraps shall also be analyzed for manganese, nickel and zinc. [Application No. 1210465-020-AC and Rule 62-4.070(3), F.A.C.]~~

On the first day that an alternative fuel material is fired, the permittee shall take a grab sample at least once every four hours of as-fired material (approximately one gallon) before transfer to the feed bin of the feeder system. At the end of each day, the grab samples shall be thoroughly mixed and a composite sample made (approximately 2 lb). At a minimum, the permittee shall use this procedure to obtain at least three, separate representative composite samples (which may include the first day sample and any obtained during stack tests) that were taken at least three operating days apart. Each representative composite sample shall be analyzed for the following: heating value, moisture, density, volatiles, ash, sulfur, chlorine and mercury. Samples of tire-derived fuel, roofing shingles, clean woody biomass and engineered fuel shall also be

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

A. Kiln 1 System – Short-Term Trial of Miscellaneous Alternative Fuel Materials

analyzed for the following metals: arsenic, cadmium, chromium, copper and lead. Samples of agricultural plastics shall be analyzed for pesticides. [Application No. 1210465-021-AC and Rule 62-4.070(3), F.A.C.]

MONITORING REQUIREMENTS

11. Operations and Emissions: During the trial period, the permittee shall continue to monitor: NO_x, SO₂, and THC emissions with the existing certified CEMS; opacity with the existing certified COMS; CO emissions with the existing process monitors; and the fuel feed rates, kiln feed rates, clinker production rate and baghouse inlet temperature with the existing continuous monitoring systems. Mercury emissions shall be determined both by material balance as well as the mercury CEMS (if available). [Application No. 1210465-020-AC and Rule 62-4.070(3), F.A.C.]
12. Upsets: When an upset condition causes the plant to stop firing an alternative fuel that results in non-steady state operation, the permittee shall record each incident and identify the cause of the upset as well as the corrective action taken. [Rule 62-4.070(3), F.A.C.]
13. Process Monitoring: For the trial, the plant will monitor: the sampling and analysis procedures used; the analytical results of the alternative fuel materials, the fuel feed rates, the kiln feed rates, the clinker production rates, pre-calciner temperature and the baghouse inlet temperature. [Application No. 1210465-020-AC and Rule 62-4.070(3), F.A.C.]

TESTING REQUIREMENTS

- ~~14. Compliance Tests: The permittee shall conduct the following stack tests to determine compliance with the dioxin/furan and particulate matter emissions standards as well as the emission rates of hydrochloric acid (HCl) and metals while operating the cement kiln at permitted capacity and firing the maximum sustainable feed rate of the alternative fuel material. The feed rate achieved during the stack tests will be used to establish the maximum feed rate for any subsequent request to permanently fire the alternative fuel material.~~
 - ~~a. PM Stack Tests: In accordance with EPA Method 5, the permittee shall conduct a stack test with the raw mill up to determine compliance with the PM emissions standard while co-firing coal with either clean woody biomass or one of the agricultural byproducts. The stack test shall consist of at least three, 1-hour test runs.~~
 - ~~b. Dioxins/Furans Stack Tests: In accordance with EPA Method 23, the permittee shall conduct a stack test with the raw mill up to determine compliance with the dioxins/furans emissions standard while co-firing coal with TDF each alternative fuel having a chlorine content greater than 1% by weight based upon the initial chlorine content sampling by the supplier in the cement kiln. The stack test shall consist of at least three, 3-hour test runs, and the sample volume for each run shall be at least 90 dscf. If a trial of TDF is not conducted, then permittee shall conduct the dioxins/furans stack test on one of the other alternative fuels in this order: roofing shingles, clean woody biomass or carpet derived fuel. If alternative fuels are only fired with the raw mill up, then the test may be conducted only with the raw mill up; otherwise separate tests shall be conducted with the raw mill up and the raw mill down.~~
 - ~~e. HCl Stack Tests: In accordance with EPA Methods 26, 26A or 321, the permittee shall conduct separate stack tests with the raw mill up to determine compliance with the HCl emissions standard while co-firing coal with TDF in the cement kiln. The stack test shall consist of at least three, 1-hour test runs. If a trial of TDF is not conducted, then permittee shall conduct the HCl stack test on one of the other alternative fuels in this order: roofing shingles, clean woody biomass or carpet derived fuel. In accordance with EPA Methods 26, 26A or 321, the permittee shall conduct a stack test determine the HCl emissions rate while co-firing coal with each alternative fuel having a chlorine content greater than 0.2% by weight based upon the initial chlorine content sampling by the supplier. The stack test shall consist of at least three, 1-hour test runs.~~

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

A. Kiln 1 System – Short-Term Trial of Miscellaneous Alternative Fuel Materials

- d. ~~Metals Stack Test: In accordance with EPA Method 29, the permittee shall conduct two separate stack tests to determine total PM and the following metal emissions while co-firing coal with TDF: arsenic, barium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver and zinc. One stack test shall be conducted when the raw mill is up and one stack test when the raw mill is down. Each stack test shall consist of at least three, 1-hour test runs. During each test run, the permittee shall increase the TDF sampling frequency to one representative grab sample (approximately 1 gallon) every 15 minutes. The four grab samples collected during each test run shall be thoroughly mixed and a composite sample made (approximately 1 lb). Each composite sample representing the test run shall be analyzed for the following: heating value, moisture, density, volatiles, ash, sulfur, chlorine, fluorine and metals (including arsenic, barium, cadmium, chromium, copper, lead, mercury, nickel, selenium, silver and zinc). In addition, the permittee shall obtain a representative sample of the baghouse dust generated and the clinker produced during each test run and have it analyzed for the same metals. If a trial of TDF is not conducted, then permittee shall conduct the stack test for metals on one of the other alternative fuels in this order: roofing shingles, clean woody biomass or carpet derived fuel.~~
- e. ~~Pesticides: In accordance with Method SW 0010/8270 for Semi-volatile Organics (including pesticides), the permittee shall conduct a stack test to determine the presence of pesticides in the exhaust while co-firing coal with non-chlorinated agricultural plastics. Other equivalent methods may be used with prior written approval of the Bureau of Air Regulation. The stack tests shall consist of at least three, 1-hour test runs. During each test run, the permittee shall increase the sampling frequency of non-chlorinated agricultural plastics to one representative grab sample (approximately 1 gallon) every 15 minutes. The four grab samples collected during each test run shall be thoroughly mixed and a composite sample made (approximately 1 lb). Each composite sample representing the test run shall be analyzed for the following: heating value, moisture, density, volatiles, ash, sulfur, chlorine, fluorine and pesticides.~~

EPA Methods 1–4 shall be used as necessary to support the other test methods. [Rule 62-4.070(3), F.A.C.]

15. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Conditions) of this permit and the current Title V air operation permit. When in conflict, the permittee shall follow the requirements of the current Title V air operation permit. [Rule 62-297.310(7)(a)9, F.A.C.]
16. Analytical Methods: The permittee shall use the following analytical methods to determine the composition of the alternative fuel materials.

Parameter	Analytical Methods
Moisture, Volatiles, Ash and Fixed Carbon	Proximate Analysis appropriate for given fuel
Carbon, Hydrogen, Nitrogen Sulfur and Oxygen	Ultimate Analysis appropriate for given fuel
Heating Value	ASTM E711 - 87(2004) Standard Test Method for Gross Calorific Value of Refuse-Derived Fuel by the Bomb Calorimeter, or ASTM D5468 - 02(2007) Standard Test Method for Gross Calorific and Ash Value of Waste Materials
Chlorine	EPA SW-846 or EPA Method 9056
Mercury	EPA 7470A/7471A
Other Metals	EPA SW-846 or EPA Method 6010B
Pesticides	EPA SW-846 3500 or EPA 3550/8150, Test Methods for Evaluating Solid Waste

Other equivalent methods may be used with prior written approval of the Bureau of Air Regulation. [Rule 62-4.070(3), F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

A. Kiln 1 System – Short-Term Trial of Miscellaneous Alternative Fuel Materials

NOTIFICATIONS, RECORDS AND REPORTS

17. Shipment Notifications: Within one day, the permittee shall notify the Compliance Authority of receiving the first shipment of each alternative fuel material. Written notifications may be made by email, fax transmittal or letter. [Rule 62-4.070(3), F.A.C.]
18. Records: In addition to plant operation and production data, the permittee shall maintain records of the monitoring and emissions data required by the permit, including, but not limited to: the sampling and analysis procedures used; the analytical results of each alternative fuel materials; each fuel feed rate; the kiln production and process data; the emissions monitoring data; the baghouse inlet temperature; times, and any specific problems that occurred during the trial and the cause of the problem. [Rule 62-4.070(3), F.A.C.]
19. Trial Burn Summary Report: Within 90 days of completing each temporary trial of alternative fuel material, the permittee shall submit a report to the Bureau of Air Regulation and the Compliance Authority summarizing: the sampling and analysis procedures used; the analytical results of the alternative fuel materials; a comparison of the heating value of each material determined by fuel analyses with that determined by the amount of coal displaced; the kiln production and process data; pre-calciner temperature; the emissions monitoring data; an analysis of emissions from firing alternative fuels compared to emissions from firing traditional fuels (separated for raw mill up/raw mill down); the baghouse inlet temperature; a conclusion as to the feasibility and practicality of firing the material as an alternative fuel; an estimate of the fuel costs that could be avoided by firing the material; the appropriate QA/QC procedures used to produce a high-quality alternative fuel (i.e., low in contaminants, high in heating value, free of scrap metals and properly sized); any specific problems that occurred during the trial and the cause of the problem; and problems with unloading storing or handling the material; problems with the material size and any re-processing conducted on site; recommendations to improve handling, storage and firing the alternative fuel material; and an assessment of the suitability of the material as a permanent alternative fuel for the plant. The report shall include a statistical analysis of the analytical data for the alternative fuel material and the emissions monitoring data. [Rule 62-4.070(3), F.A.C.]

SECTION 4. APPENDICES

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Citation Formats and Glossary of Common Terms

CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit
“AO” identifies the permit as an Air Operation Permit
“123456” identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located
“2222” represents the specific facility ID number for that county
“001” identifies the specific permit project number
“AC” identifies the permit as an air construction permit
“AF” identifies the permit as a minor source federally enforceable state operation permit
“AO” identifies the permit as a minor source air operation permit
“AV” identifies the permit as a major Title V air operation permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality
“FL” means that the permit was issued by the State of Florida
“317” identifies the specific permit project number

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System
(Department’s database)

BACT: best available control technology

bhp: brake horsepower

Btu: British thermal units

CAM: compliance assurance monitoring

CEMS: continuous emissions monitoring system

cfm: cubic feet per minute

CFR: Code of Federal Regulations

SECTION 4. APPENDIX A

Citation Formats and Glossary of Common Terms

CAA: Clean Air Act	NESHAP: National Emissions Standards for Hazardous Air Pollutants
CMS: continuous monitoring system	NO_x: nitrogen oxides
CO: carbon monoxide	NSPS: New Source Performance Standards
CO₂: carbon dioxide	O&M: operation and maintenance
COMS: continuous opacity monitoring system	O₂: oxygen
DARM: Division of Air Resource Management	Pb: lead
DEP: Department of Environmental Protection	PM: particulate matter
Department: Department of Environmental Protection	PM₁₀: particulate matter with a mean aerodynamic diameter of 10 microns or less
dscf: dry standard cubic feet	ppm: parts per million
dscfm: dry standard cubic feet per minute	ppmv: parts per million by volume
EPA: Environmental Protection Agency	ppmvd: parts per million by volume, dry basis
ESP: electrostatic precipitator (control system for reducing particulate matter)	QA: quality assurance
EU: emissions unit	QC: quality control
F: fluoride	PSD: prevention of significant deterioration
F.A.C.: Florida Administrative Code	psi: pounds per square inch
F.A.W.: Florida Administrative Weekly	PTE: potential to emit
F.D.: forced draft	RACT: reasonably available control technology
F.S.: Florida Statutes	RATA: relative accuracy test audit
FGD: flue gas desulfurization	RBLC: EPA's RACT/BACT/LAER Clearinghouse
FGR: flue gas recirculation	SAM: sulfuric acid mist
ft²: square feet	scf: standard cubic feet
ft³: cubic feet	scfm: standard cubic feet per minute
gpm: gallons per minute	SIC: standard industrial classification code
gr: grains	SIP: State Implementation Plan
HAP: hazardous air pollutant	SNCR: selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
Hg: mercury	SO₂: sulfur dioxide
I.D.: induced draft	TPD: tons/day
ID: identification	TPH: tons per hour
kPa: kilopascals	TPY: tons per year
lb: pound	TRS: total reduced sulfur
MACT: maximum achievable technology	UTM: Universal Transverse Mercator coordinate system
MMBtu: million British thermal units	VE: visible emissions
MSDS: material safety data sheets	VOC: volatile organic compounds
MW: megawatt	

SECTION 4. APPENDIX B

General Conditions

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - a. Have access to and copy any records that must be kept under conditions of the permit;
 - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - a. A description of and cause of noncompliance; and
 - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

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General Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - a. Determination of Best Available Control Technology (no new determinations);
 - b. Determination of Prevention of Significant Deterioration (no new determinations); and
 - c. Compliance with New Source Performance Standards (no new standards).
14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - c. Records of monitoring information shall include:
 - (a) The date, exact place, and time of sampling or measurements;
 - (b) The person responsible for performing the sampling or measurements;
 - (c) The dates analyses were performed;
 - (d) The person responsible for performing the analyses;
 - (e) The analytical techniques or methods used;
 - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX C

Common Conditions

Unless otherwise specified in the permit or other valid permits, the following conditions apply to all emissions units and activities at the facility.

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

COMPLIANCE TESTING REQUIREMENTS

Unless otherwise specified in the permit, the following testing requirements apply to all emissions units that require testing.

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be

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Common Conditions

discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. [Rule 62-297.310(2), F.A.C.]
12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]
13. Applicable Test Procedures:
 - a. Required Sampling Time.
 - (1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.
 - (2) Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be 60 minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and 30 minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Exceptions to these requirements are as follows:
 - (a) For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.
 - (b) The observation period for special opacity tests that are conducted to provide data to establish a surrogate standard pursuant to Rule 62-297.310(5)(k), F.A.C., Waiver of Compliance Test Requirements, shall be established as necessary to properly establish the relationship between a proposed surrogate standard and an existing mass emission limiting standard.
 - (c) The minimum observation period for opacity tests conducted by employees or agents of the Department to verify the day-to-day continuing compliance of a unit or activity with an applicable opacity standard shall be twelve minutes.
 - b. Minimum Sample Volume. Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.
 - c. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.
 - d. Calibration of Sampling Equipment. Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.
 - e. Allowed Modification to EPA Method 5. When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

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Common Conditions

TABLE 297.310-1 CALIBRATION SCHEDULE			
ITEM	MINIMUM CALIBRATION FREQUENCY	REFERENCE INSTRUMENT	TOLERANCE
Liquid in glass thermometer	Annually	ASTM Hg in glass ref. thermometer or equivalent or thermometric points	+/-2%
Bimetallic thermometer	Quarterly	Calibration liquid in glass	5° F
Thermocouple	Annually	ASTM Hg in glass ref. thermometer, NBS calibrated reference and potentiometer	5° F
Barometer	Monthly	Hg barometer or NOAA station	+/-1% scale
Pitot Tube	When required or when damaged	By construction or measurements in wind tunnel D greater than 16" and standard pitot tube	See EPA Method 2, Fig. 2-2 & 2-3
Probe Nozzles	Before each test or when nicked, dented, or corroded	Micrometer	+/- 0.001" mean of at least three readings; Max. deviation between readings, 0.004"
Dry Gas Meter and Orifice Meter	1. Full Scale: When received, when 5% change observed, annually	Spirometer or calibrated wet test or dry gas test meter	2%
	2. One Point: Semiannually		
	3. Check after each test series	Comparison check	5%

[Rule 62-297.310(4), F.A.C.]

14. Determination of Process Variables:

- a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.
- b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must also comply with all applicable Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

- a. **Permanent Test Facilities.** The owner or operator of an emissions unit for which a compliance test, other than a

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visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

- b. Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.
- c. Sampling Ports.
 - (1) All sampling ports shall have a minimum inside diameter of 3 inches.
 - (2) The ports shall be capable of being sealed when not in use.
 - (3) The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
 - (4) For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
 - (5) On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.
- d. Work Platforms.
 - (1) Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
 - (2) On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
 - (3) On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
 - (4) All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toe board, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.
- e. Access to Work Platform.
 - (1) Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.
 - (2) Walkways over free-fall areas shall be equipped with safety rails and toe boards.
- f. Electrical Power.
 - (1) A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.
 - (2) If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.
- g. Sampling Equipment Support.

SECTION 4. APPENDIX C

Common Conditions

- (1) A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.
 - (a) The bracket shall be a standard 3 inch × 3 inch × one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.
 - (b) A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.
 - (c) The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.
- (2) A complete monorail or dual rail arrangement may be substituted for the eyebolt and bracket.
- (3) When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

NOTIFICATIONS, RECORDS AND REPORTS

16. Test Notifications: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7), F.A.C.]
17. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
18. Emissions Computation and Reporting:
 - a. *Applicability*. This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]
 - b. *Computation of Emissions*. For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
 - (1) *Basic Approach*. The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
 - (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
 - (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-

SECTION 4. APPENDIX C

Common Conditions

210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.

- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) Continuous Emissions Monitoring System (CEMS).
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
 - 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
 - 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
 - (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
 - 1) A calibrated flow meter that records data on a continuous basis, if available; or
 - 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) Mass Balance Calculations.
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
 - 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and
 - 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
 - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
 - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more

SECTION 4. APPENDIX C

Common Conditions

accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.

- 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
 - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
 - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
- b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
 - (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
 - (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
 - (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
 - a. All Title V sources.
 - b. All synthetic non-Title V sources.
 - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
 - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following

SECTION 4. APPENDIX C

Common Conditions

year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.

- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

19. Test Reports:

- a. The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test.
- b. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.
- c. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information.
 - (1) The type, location, and designation of the emissions unit tested.
 - (2) The facility at which the emissions unit is located.
 - (3) The owner or operator of the emissions unit.
 - (4) The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
 - (5) The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
 - (6) The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
 - (7) A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
 - (8) The date, starting time and duration of each sampling run.
 - (9) The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
 - (10) The number of points sampled and configuration and location of the sampling plane.
 - (11) For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
 - (12) The type, manufacturer and configuration of the sampling equipment used.
 - (13) Data related to the required calibration of the test equipment.
 - (14) Data on the identification, processing and weights of all filters used.
 - (15) Data on the types and amounts of any chemical solutions used.
 - (16) Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
 - (17) The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and

SECTION 4. APPENDIX C

Common Conditions

prepared the report.

- (18) All measured and calculated data required to be determined by each applicable test procedure for each run.
- (19) The detailed calculations for one run that relate the collected data to the calculated emission rate.
- (20) The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
- (21) A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

SECTION IV. APPENDIX D.

Criteria for Material Suppliers

The permittee shall provide each supplier with a copy of this air construction permit including the following criteria for material suppliers.

General Criteria

1. Material suppliers must use best efforts and good housekeeping practices to keep unwanted substances and incombustible materials from mixing with the alternative fuel materials.
2. All alternative fuel materials must be properly shredded and sized before being delivered to the Branford Cement Plant. Each material supplier must develop QA/QC procedures to exclude foreign materials (e.g., painted material, treated material, metals, soils and incombustibles) from the alternative fuel materials.
3. Prior to Initial Delivery:
 - a. For each alternative fuel material, the material supplier must take at least eight random grab samples (approximately 1 lb). The eight grab samples must be combined and thoroughly mixed. A composite sample (approximately 2 lb) will be made from mixed grab samples. The composite sample will be split into two duplicates (approximately 1 lb each). Each sample will be labeled with the date, time, and sampling staff name. The source material will be segregated from other materials until the analytical results are received.
 - b. A Each composite sample must be submitted to an appropriate testing lab. The duplicate sample will be retained by the material supplier, CEMEX or an independent party in case a second analysis is needed. The testing lab will analyze each composite sample for: heating value, moisture, density, volatiles, ash, sulfur, chlorine, fluorine and mercury. Samples of tire-derived fuel, reject roofing shingles, and clean woody biomass and engineered fuel shall also be analyzed for the following metals: arsenic, cadmium, chromium, copper and lead. The composite samples for non-chlorinated agricultural plastics shall also be analyzed for pesticides.
 - c. The material supplier or CEMEX must obtain the representative analytical results from the lab before the first delivery of an alternative fuel material to the Branford Cement Plant. If the material supplier obtains the results, the supplier must provide a copy of the analytical results to the Branford Cement Plant prior to, or along with, the first delivery of an alternative fuel material.
4. Each alternative fuel material shall be transported in covered trucks.

Non-chlorinated Agricultural Plastics

This material must consist of non-chlorinated, polyethylene plastic, for example polyethylene plastic used primarily in agricultural and silvicultural operations to prevent weed growth, control soil erosion and moisture exposure. Note that the Branford Cement Plant cannot accept more than a total of 3,000 1250 tons of this material. The composite samples must also be analyzed for pesticides.

Tire-Derived Fuel (TDF) and Tire Fluff (TDF)

Tire-derived fuel consists of shredded used tires, which may have steel belt material and tire fluff. Tire fluff consists of the shredded materials from the crumb of tires with no metal. No more than 1,500 tons shall be fired in the kiln. Note that the Branford Cement Plant cannot accept more than a total of 1,500 tons of this material.

Manufacturer Reject Roofing Shingles

This material shall consist of never before used reject shingles. The incombustible grit material shall be removed from the shingles. The material supplier must obtain a copy of the manufacturer certification that shows the reject shingles are "asbestos free" and present a copy of the certification to the Branford Cement Plant prior to, or along with any shipment. Note that the Branford Cement Plant cannot accept more than a total of 4,000 tons of this material.

Used Roofing Shingle Scraps

This material consists of a combination of leftover new material from roofing shingle production ("roofing shingle tabs"), used roofing shingles from residential roof replacements ("tear-off") and minimal roofing debris. The bulk of incombustible grit material shall be removed from the shingles. The maximum representative storage/sampling pile size for this alternative fuel material is 200 tons. Note that the Branford Cement Plant cannot accept more than a total of 4,000 tons of this material.

For this material, the sampling procedure described above in the General Criteria must be conducted twice to obtain two separate composite samples. One A composite sample shall be analyzed for the constituents specified in the General Criteria plus asbestos, manganese, nickel and zinc. The second composite sample must be analyzed only for asbestos. The material supplier must obtain analytical results that show the used roofing shingle scraps contain no asbestos fibers as determined by polarized light microscopy method or equivalent method in Subpart M of 40 CFR 61. The material supplier must also follow the certification and documentation additional procedures identified in Subpart M of 40 CFR 61, Appendix E (Documentation

SECTION IV. APPENDIX D.

Criteria for Material Suppliers

for Used Roofing Shingle Scraps) of this permit. The material supplier must provide a copy of each Manifest Form and Asbestos Report Form representing each shipment to the Branford Cement Plant prior to, or along with the shipment.

Clean Woody Biomass

This material may include clean untreated lumber, tree stumps, tree limbs, slash, bark, sawdust, sander dust, wood chips scraps, wood scraps, wood slabs, wood millings, wood shavings, and processed pellets made from wood or other forest residues. This material excludes copper-chromium-arsenic (CCA)-treated wood, creosote-treated wood, construction and demolition (C&D) debris, plywood, particle board, medium density fiberboard, oriented strand board, laminated beams, finger-jointed trim and sheet goods. Note that the Branford Cement Plant cannot accept more than a total of 4,000 tons of this material.

Agricultural Organic Fibrous Byproducts

This material includes peanut hulls, rice hulls, corn husks, citrus peels, cotton gin byproducts, animal bedding, etc. Other similar types of materials of organic fibrous byproducts may be tried with prior written approval of the Department. Note that the Branford Cement Plant cannot accept more than 5,000 tons of any single type of this material and no more than a total of 25,000 tons of all agricultural organic fibrous byproducts. Also, be aware that the Branford Cement Plant may not store more than 5,000 tons of this material on site at any given time.

Pre-Consumer Paper

This material must consist of pre-consumer paper such as: printing and writing paper; household and sanitary paper; wrapping and packaging paper; paper board; chipboard; Kraft liner, writing and packaging paper; fluting; other wrapping and packaging paper; folding boxboard; other paperboard; polymer laminated wrapping paper; game boards and boxes; foil wrapping paper; thermal papers; specialty papers for filtration or hygienic applications; adhesive labels; waxed corrugated cardboard; and other miscellaneous coated papers. This group of materials also includes fabrics and textiles such as dyed/finished natural fibers, dyed/finished natural fiber woven/scrap trim, polymer fiber woven scrap trim, and undyed/unfinished natural or synthetic fiber scrap trim. Note that the Branford Cement Plant cannot accept more than a total of ~~5,000~~ ~~3,500~~ tons of this material.

Post-Consumer Paper

This material will be provided by Materials Recovery and Recycling Facilities (MRRF) and consists primarily of used, mixed office paper that is too costly to separate for recycling. The maximum representative storage/sampling pile size is 200 tons. Note that the Branford Cement Plant cannot accept more than a total of ~~5,000~~ ~~3,500~~ tons of this material.

Carpet-Derived Fuel

This material consists of shredded new, reject or used carpet. Note that the Branford Cement Plant cannot accept more than a total of ~~6,500~~ ~~2,500~~ tons of this material.

Alternative Fuel Mix

Subject to the individual limits on material quantities, alternative fuels for which all required sampling/analysis and stack tests (if necessary) have been conducted and satisfactory results obtained may be blended and fired as a separate alternative fuel trial.

Engineered Fuel

This material consists of a mix of non-hazardous materials or wastes such as wood, paper, plastic, fabrics, carpet and foams. This material is a product of targeted recycle and recovery of materials from construction and demolition debris. The material will be developed as a dry, high energy, clean burning fuel material for use at the Branford cement plant with the bulk of incombustible materials removed to improve burnability. Production of this alternative fuel from the source material involves selective collection followed by the use of state of the art separation processes that include the use of magnetic, density, screening and hand sorting techniques. During the test trial no more than 5,000 tons shall be fired in the kiln.

Friday, Barbara

To: tomm@vscsmc.com
Cc: celsom@vscsmc.com; jbhorton@vcnainc.com; krishnac@vscsmc.com;
mlee@kooglerassociates.com; chris@alachuacounty.us; lmcshe2001@aol.com; long5892@bellsouth.net; dmot51@aol.com; commissioners@suwcounty.org; boccc@alachuacounty.us; Strong, Greg; Kirts, Christopher; Kathleen Forney; abrams.heather@epamail.epa.gov; langston.david@epa.gov; Gibson, Victoria; DeVore, Christy
Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC
Attachments: 1210465-022-ACSignedWrittenNoticeofIntent.pdf

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air 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).

Attention: Christy DeVore

Owner/Company Name: SUWANNEE AMERICAN CEMENT, LLC

Facility Name: BRANFORD CEMENT PLANT

Project Number: 1210465-022-AC

Permit Status: DRAFT

Permit Activity: CONSTRUCTION

Facility County: SUWANNEE

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.022.AC.D_pdf.zip

“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://appprod.dep.state.fl.us/air/emission/apds/default.asp>”

Permit 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.

Barbara Friday
Permitting and Compliance Section
Division of Air Resource Management (DARM)
(850)717-9095

Friday, Barbara

To: tomm@vcsmc.com
Subject: Suwannee American Cement, LLC - Branford Cement Plant; 1210465-022-AC
Attachments: 1210465-022-ACSignedWrittenNoticeofIntent.pdf

Mr. Messer,

I have not received confirmation that you were able to access this June 29th attached document. 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.

Thank you,

Air Permitting and Compliance Section
Division of Air Resources Management (DARM)
(850)717-9095
Barbara.Friday@dep.state.fl.us

Friday, Barbara

From: Microsoft Exchange
To: 'tomm@vcsmc.com'
Sent: Tuesday, July 12, 2011 10:43 AM
Subject: Relayed: Suwannee American Cement, LLC - Branford Cement Plant; 1210465-022-AC

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'tomm@vcsmc.com'

Subject: Suwannee American Cement, LLC - Branford Cement Plant; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Messer Tom [tomm@vcsmc.com]
To: Friday, Barbara
Sent: Tuesday, July 12, 2011 10:44 AM
Subject: Read: Suwannee American Cement, LLC - Branford Cement Plant; 1210465-022-AC

Your message was read on Tuesday, July 12, 2011 10:43:45 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Messer Tom [tomm@vcsmc.com]
Sent: Tuesday, July 12, 2011 10:48 AM
To: Friday, Barbara
Subject: RE: Suwannee American Cement, LLC - Branford Cement Plant; 1210465-022-AC

Received,
Thanks,
Tom

From: Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]
Sent: Tuesday, July 12, 2011 10:42 AM
To: Messer Tom
Subject: Suwannee American Cement, LLC - Branford Cement Plant; 1210465-022-AC

Mr. Messer,

I have not received confirmation that you were able to access this June 29th attached document. Please confirm receipt by opening the attachment and sending a reply to me.

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Thank you,

Air Permitting and Compliance Section
Division of Air Resources Management (DARM)
(850)717-9095
Barbara.Friday@dep.state.fl.us

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. 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](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Microsoft Exchange
To: 'tomm@vcsmc.com'; 'celsom@vcsmc.com'; 'krishnac@vcsmc.com'
Sent: Wednesday, June 29, 2011 11:20 AM
Subject: Relayed: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'tomm@vcsmc.com'

'celsom@vcsmc.com'

'krishnac@vcsmc.com'

Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Messer Tom [tomm@vcsmc.com]
To: Friday, Barbara
Sent: Wednesday, June 29, 2011 11:20 AM
Subject: Read: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Your message was read on Wednesday, June 29, 2011 11:20:25 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: 'jbhorton@vcnainc.com'
Sent: Wednesday, June 29, 2011 11:20 AM
Subject: Relayed: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'jbhorton@vcnainc.com'

Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Cole Krishna [krishnac@suwanneecement.com]
Sent: Thursday, June 30, 2011 8:24 AM
To: Friday, Barbara
Subject: RE: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Message received and documents accessed.

From: Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]
Sent: Wednesday, June 29, 2011 11:19 AM
To: Messer Tom
Cc: Martini Celso; Horton Joe; Cole Krishna; mlee@kooglerassociates.com; chris@alachuacounty.us; lmcshe2001@aol.com; long5892@bellsouth.net; dmot51@aol.com; commissioners@suwcounty.org; bocc@alachuacounty.us; Strong, Greg; Kirts, Christopher; 'Kathleen Forney'; abrams.heather@epamail.epa.gov; langston.david@epa.gov; Gibson, Victoria; DeVore, Christy
Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Dear Sir/ Madam:

Attached is the official **Written Notice of Intent to Issue Air 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).

Attention: Christy DeVore

Owner/Company Name: SUWANNEE AMERICAN CEMENT, LLC
Facility Name: BRANFORD CEMENT PLANT
Project Number: 1210465-022-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: SUWANNEE

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.022.AC.D_pdf.zip

“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://appprod.dep.state.fl.us/air/emission/apds/default.asp>.

Permit 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.

Barbara Friday
Permitting and Compliance Section
Division of Air Resource Management (DARM)
(850)717-9095

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. 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](#). Thank you in advance for completing the survey.

Friday, Barbara

From: Microsoft Exchange
To: 'mlee@kooglerassociates.com'
Sent: Wednesday, June 29, 2011 11:19 AM
Subject: Relayed: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'mlee@kooglerassociates.com'

Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Max Lee [mlee@kooglerassociates.com]
Sent: Wednesday, June 29, 2011 11:28 AM
To: Friday, Barbara
Subject: Read: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC
Attachments: ATT00001

Friday, Barbara

From: Max Lee [mlee@kooglerassociates.com]
Sent: Wednesday, June 29, 2011 11:38 AM
To: Friday, Barbara
Subject: RE: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

received.

Thank you.

From: Friday, Barbara [mailto:Barbara.Friday@dep.state.fl.us]
Sent: Wednesday, June 29, 2011 11:19 AM
To: tomm@vscmc.com
Cc: celsom@vscmc.com; jbhorton@vcnainc.com; krishnac@vscmc.com; mlee@kooglerassociates.com; chris@alachuacounty.us; lmcsh2001@aol.com; long5892@bellsouth.net; dmot51@aol.com; commissioners@suwcounty.org; bocc@alachuacounty.us; Strong, Greg; Kirts, Christopher; 'Kathleen Forney'; abrams.heather@epamail.epa.gov; langston.david@epa.gov; Gibson, Victoria; DeVore, Christy
Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

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Attention: Christy DeVore

Owner/Company Name: SUWANNEE AMERICAN CEMENT, LLC
Facility Name: BRANFORD CEMENT PLANT
Project Number: 1210465-022-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: SUWANNEE

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http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.022.AC.D_pdf.zip

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Barbara Friday
Permitting and Compliance Section
Division of Air Resource Management (DARM)
(850)717-9095

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Friday, Barbara

From: Microsoft Exchange
To: Kirts, Christopher; Strong, Greg; Gibson, Victoria
Sent: Wednesday, June 29, 2011 11:19 AM
Subject: Delivered: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Your message has been delivered to the following recipients:

Kirts, Christopher

Strong, Greg

Gibson, Victoria

Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Kirts, Christopher
To: Friday, Barbara
Sent: Thursday, June 30, 2011 8:52 AM
Subject: Read: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Your message was read on Thursday, June 30, 2011 8:52:28 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Strong, Greg
To: Friday, Barbara
Sent: Wednesday, June 29, 2011 11:20 AM
Subject: Read: SUWANNÉE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Your message was read on Wednesday, June 29, 2011 11:20:03 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Gibson, Victoria
To: Friday, Barbara
Sent: Wednesday, June 29, 2011 11:23 AM
Subject: Read: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Your message was read on Wednesday, June 29, 2011 11:22:56 AM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: DeVore, Christy
Sent: Wednesday, June 29, 2011 11:19 AM
Subject: Delivered: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Your message has been delivered to the following recipients:

DeVore, Christy

Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: DeVore, Christy
To: Friday, Barbara
Sent: Wednesday, June 29, 2011 12:24 PM
Subject: Read: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Your message was read on Wednesday, June 29, 2011 12:24:27 PM (GMT-05:00) Eastern Time (US & Canada).

Friday, Barbara

From: Microsoft Exchange
To: 'commissioners@suwcounty.org'
Sent: Wednesday, June 29, 2011 11:19 AM
Subject: Relayed: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'commissioners@suwcounty.org'

Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Microsoft Exchange
To: 'chris@alachuacounty.us'; 'bocc@alachuacounty.us'
Sent: Wednesday, June 29, 2011 11:19 AM
Subject: Relayed: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;
1210465-022-AC

Delivery to these recipients or distribution lists is complete, but delivery notification was not sent by the destination:

'chris@alachuacounty.us'

'bocc@alachuacounty.us'

Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Sent by Microsoft Exchange Server 2007

Friday, Barbara

From: Latoya T. Gainey [lgainey@alachuacounty.us]
Sent: Wednesday, June 29, 2011 4:21 PM
To: Friday, Barbara
Subject: RE: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Email and attachments received by the Alachua County Board of County Commissioners.

Thank you,

Latoya Gainey
Alachua County Commission
lgainey@alachuacounty.us
352-264-6900

From: Friday, Barbara [<mailto:Barbara.Friday@dep.state.fl.us>]
Sent: Wednesday, June 29, 2011 11:19 AM
To: tomm@vcsmc.com
Cc: celsom@vcsmc.com; jbhorton@vcnainc.com; krishnac@vcsmc.com; mlee@kooglerassociates.com; Chris Bird; lmcshe2001@aol.com; long5892@bellsouth.net; dmot51@aol.com; commissioners@suwcounty.org; BOCC (Only Commissioners); Strong, Greg; Kirts, Christopher; 'Kathleen Forney'; abrams.heather@epamail.epa.gov; langston.david@epa.gov; Gibson, Victoria; DeVore, Christy
Subject: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

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Attention: Christy DeVore

Owner/Company Name: SUWANNEE AMERICAN CEMENT, LLC
Facility Name: BRANFORD CEMENT PLANT
Project Number: 1210465-022-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: SUWANNEE

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Barbara Friday
Permitting and Compliance Section
Division of Air Resource Management (DARM)
(850)717-9095

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