

# Florida Department of Environmental Protection

## Memorandum

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To: Michael Halpin, Division of Air Resource Management  
Through: Jeff Koerner, Office of Permitting and Compliance *JK*  
Syed Arif, Office of Permitting and Compliance *SA 7/25*  
From: Christy DeVore, Office of Permitting and Compliance *CR*  
Date: July 25, 2011  
Subject: Final Air Permit No. 1210465-022-AC  
Suwannee American Cement, LLC, Branford Cement Plant  
Revision to Miscellaneous Alternative Fuel Trials

The final permit for this project is attached for your approval and signature. The final 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 proposed work will be performed at the existing Suwannee American Cement Plant which is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The project is not considered a new source review reform project.

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

Attachments

JFK/scd

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**FINAL DETERMINATION**

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**PERMITTEE**

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

**PERMITTING AUTHORITY**

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

**PROJECT**

Air Permit No. 1210465-022-AC  
Minor Air Construction Permit  
Branford Cement Plant

This final 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.

**NOTICE AND PUBLICATION**

The Department distributed a draft minor air construction permit package on June 29, 2011. The applicant published the Public Notice in the Suwannee Democrat on July 8, 2011. The Department received the proof of publication on July 14, 2011. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

**COMMENTS**

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

**OTHER CHANGES**

The Department made minor clerical changes.

**CONCLUSION**

The final action of the Department is to issue the permit with the minor changes, corrections and clarifications as described above.



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

## 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  
Modification of Air Permit No. 1210465-020-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

Jeffery F. Koerner, P.E., Program Administrator  
Office of Permitting and Compliance  
Division of Air Resource Management

7-26-11  
(Date)

**FINAL PERMIT**

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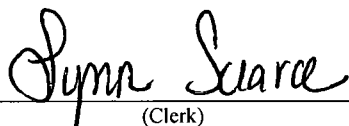
**CERTIFICATE OF SERVICE**

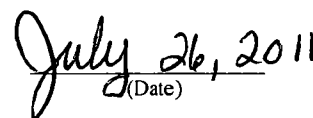
The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 7-26-11 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, (dmt51@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. Lynn Scarce, DEP OPC Reading File (lynn.scarce@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)

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

## SECTION 1. GENERAL INFORMATION

### 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/calcliner 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<sub>x</sub> reported as NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>) 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

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1. Permitting Authority: All documents related to PSD applications for permits to construct or modify emissions units shall be submitted to the Office of Permitting and Compliance 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).
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.]

**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 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 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 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 Plastics*: This material consists of non-chlorinated plastics, for example, polyethylene plastic used primarily in agricultural and silvicultural operations to prevent weed growth, control soil erosion and moisture exposure. No more than 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.
  - 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,

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

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

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 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 5,000 tons shall be fired in the kiln.
- i. *Carpet-Derived Fuel*: This material consists of *shredded* carpet (rejects, new or used). No more than 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 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.
  - 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



**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT**

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

- 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). [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.
  - 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. [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:

<b>Material</b>	<b>Estimated Maximum Firing Rates (tons/hour)</b>
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
Alternative Fuel Mix	10
Engineered Fuel	10

*{Permitting Note: Since the 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*

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT

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

*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.]

#### MONITORING REQUIREMENTS

10. **Sampling/Analyses:** 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 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.]
11. **Operations and Emissions:** During the trial period, the permittee shall continue to monitor: NO<sub>x</sub>, SO<sub>2</sub>, 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.]
14. **Analytical Methods:** The permittee shall use the following analytical methods to determine the composition of the alternative fuel materials.

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS - DRAFT**

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

<b>Parameter</b>	<b>Analytical Methods</b>
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 Office of Permitting and Compliance. [Rule 62-4.070(3), F.A.C.]

**NOTIFICATIONS, RECORDS AND REPORTS**

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 C (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. **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.]
17. **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.]
18. **Trial Burn Summary Report:** Within 90 days of completing each temporary trial of alternative fuel material, the permittee shall submit a report to the Office of Permitting and Compliance 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; 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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**Contents**

- Appendix A. Citation Formats and Glossary of Common Terms
- Appendix B. General Conditions
- Appendix C. Common Conditions
- Appendix D. Criteria for Material Suppliers

## SECTION 4. APPENDIX A

### 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

<b>CAA:</b> Clean Air Act	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CMS:</b> continuous monitoring system	<b>NSPS:</b> New Source Performance Standards
<b>CO:</b> carbon monoxide	<b>O&amp;M:</b> operation and maintenance
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O<sub>2</sub>:</b> oxygen
<b>COMS:</b> continuous opacity monitoring system	<b>OPC:</b> Office of Permitting and Compliance
<b>DARM:</b> Division of Air Resource Management	<b>Pb:</b> lead
<b>DEP:</b> Department of Environmental Protection	<b>PM:</b> particulate matter
<b>Department:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>dscf:</b> dry standard cubic feet	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QA:</b> quality assurance
<b>EU:</b> emissions unit	<b>QC:</b> quality control
<b>F:</b> fluoride	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SIP:</b> State Implementation Plan
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPD:</b> tons/day
<b>ID:</b> identification	<b>TPH:</b> tons per hour
<b>kPa:</b> kilopascals	<b>TPY:</b> tons per year
<b>lb:</b> pound	<b>TRS:</b> total reduced sulfur
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	
<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants	

## 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.

## SECTION 4. APPENDIX B

### 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

## SECTION 4. APPENDIX C

### 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.

## SECTION 4. APPENDIX C

## 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

## SECTION 4. APPENDIX C

### Common Conditions

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 composite sample must be submitted to an appropriate testing lab. The duplicate sample will be retained by the material supplier, Suwannee American Cement Plant 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 and mercury. Samples of tire-derived fuel, roofing shingles, 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 Suwannee American Cement Plant 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 Plastics

This material must consist of non-chlorinated plastics, 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 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. 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. A composite sample shall be analyzed 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 procedures identified in Subpart M of 40 CFR 61.

## SECTION IV. APPENDIX D.

### Criteria for Material Suppliers

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#### **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 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 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 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.

## Scearce, Lynn

**From:** Scearce, Lynn  
**Sent:** Tuesday, July 26, 2011 9:59 AM  
**To:** 'tomm@vcsmc.com'  
**Cc:** DeVore, Christy; 'celsom@vcsmc.com'; 'jbhorton@vcnainc.com'; 'krishnac@vcsmc.com'; 'mlee@kooglerassociates.com'; 'lmcshe2001@aol.com'; 'chris@alachuacounty.us'; 'long5892@bellsouth.net'; 'dmot51@aol.com'; 'commissioners@suwcounty.org'; 'bocc@alachuacounty.us'; 'greg.strong@dep.state.fl.us'; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'Scearce, Lynn'; Friday, Barbara  
**Subject:** Suwannee American Cement, No. 1210465-022-AC, Final Permit

### Tracking:

Recipient	Delivery	Read
'tomm@vcsmc.com'	✓	✓ <i>ok done</i>
DeVore, Christy	Delivered: 7/26/2011 9:59 AM	
'celsom@vcsmc.com'	✓	
'jbhorton@vcnainc.com'	✓	
'krishnac@vcsmc.com'	✓	
'mlee@kooglerassociates.com'	✓	✓
'lmcshe2001@aol.com'		
'chris@alachuacounty.us'		
'long5892@bellsouth.net'		
'dmot51@aol.com'	✓	✓
'commissioners@suwcounty.org'	✓	
'bocc@alachuacounty.us'		
'greg.strong@dep.state.fl.us'	Delivered: 7/26/2011 9:59 AM	
Kirts, Christopher	Delivered: 7/26/2011 9:59 AM	
'forney.kathleen@epa.gov'		
'abrams.heather@epa.gov'		
'Scearce, Lynn'		Read: 7/26/2011 10:05 AM
Friday, Barbara	Delivered: 7/26/2011 9:59 AM	Read: 7/26/2011 10:00 AM
Scearce, Lynn	Delivered: 7/26/2011 9:59 AM	
Strong, Greg		Read: 7/26/2011 10:00 AM

Dear Mr. Messer:

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

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

Attention:

Owner/Company Name: SUWANNEE AMERICAN CEMENT CO.  
Facility Name: SUWANNEE AMERICAN CEMENT  
Project Number: 1210465-022-AC

Permit Status: FINAL  
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.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.022.AC.F_pdf.zip)

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

Permit project documents 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, Office of Permitting and Compliance.

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

**Regards,**  
**Lynn Searce**  
Office of Permitting and Compliance (OPC)  
Division of Air Resources Management  
850-717-9025

## Scearce, Lynn

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**From:** Koerner, Jeff  
**Sent:** Friday, July 29, 2011 4:07 PM  
**To:** Scearce, Lynn  
**Subject:** FW: Suwannee American Cement - Revisions

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**From:** Messer Tom [<mailto:tomm@vcsmc.com>]  
**Sent:** Friday, July 29, 2011 4:05 PM  
**To:** Koerner, Jeff  
**Subject:** RE: Suwannee American Cement - Revisions

Jeff,  
We received the final permit. Sorry, I was away from my desk the last few days.

Have a good weekend,  
Tom

---

**From:** Koerner, Jeff [<mailto:Jeff.Koerner@dep.state.fl.us>]  
**Sent:** Friday, July 29, 2011 3:26 PM  
**To:** Cole Krishna; Messer Tom  
**Cc:** Scearce, Lynn  
**Subject:** Suwannee American Cement - Revisions

Krishna and Tom,

Please reply to this email if you received the revised final permit.

We just need this to close out the file.

Thanks!

Jeff

**Jeffery F. Koerner, Program Administrator**

Office of Permitting and Compliance  
Division of Air Resource Management  
Florida Department of Environmental Protection  
Phone: 850-717-9083 / Fax: 850-717-9001  
Email: [Jeff.Koerner@dep.state.fl.us](mailto:Jeff.Koerner@dep.state.fl.us)  
Web: <http://www.dep.state.fl.us/air/>

*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. Copy the url below to a web browser to complete the DEP survey: <http://survey.dep.state.fl.us/?refemail=Jeff.Koerner@dep.state.fl.us> Thank you in advance for completing the survey.*

## Scearce, Lynn

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**From:** Latoya T. Gainey [lgainey@alachuacounty.us] on behalf of Alachua County BOCC [Quorum@alachuacounty.us]  
**Sent:** Wednesday, July 27, 2011 8:30 AM  
**To:** Scearce, Lynn  
**Cc:** Darlene T. Ryon; Beth B. Alexander  
**Subject:** RE: Suwannee American Cement, No. 1210465-022-AC, Final Permit

Ms. Scearce,

I acknowledge on behalf of the Alachua County Board of County Commissioners that the email below was receive. The permit project documents are accessible.

*Latoya Gainey*

Alachua County Commission  
[lgainey@alachuacounty.us](mailto:lgainey@alachuacounty.us)  
352-264-6920

---

**From:** Scearce, Lynn [<mailto:Lynn.Scearce@dep.state.fl.us>]  
**Sent:** Tuesday, July 26, 2011 9:59 AM  
**To:** [tomm@vcsmc.com](mailto:tomm@vcsmc.com)  
**Cc:** DeVore, Christy; [celsom@vcsmc.com](mailto:celsom@vcsmc.com); [jbhorton@vcnainc.com](mailto:jbhorton@vcnainc.com); [krishnac@vcsmc.com](mailto:krishnac@vcsmc.com); [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com); [lmcshe2001@aol.com](mailto:lmcshe2001@aol.com); Chris Bird; [long5892@bellsouth.net](mailto:long5892@bellsouth.net); [dmot51@aol.com](mailto:dmot51@aol.com); [commissioners@suwcounty.org](mailto:commissioners@suwcounty.org); BOCC (Only Commissioners); Strong, Greg; Kirts, Christopher; [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov); [abrams.heather@epa.gov](mailto:abrams.heather@epa.gov); Scearce, Lynn; Friday, Barbara  
**Subject:** Suwannee American Cement, No. 1210465-022-AC, Final Permit

Dear Mr. Messer:

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

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

Attention:

Owner/Company Name: SUWANNEE AMERICAN CEMENT CO.  
Facility Name: SUWANNEE AMERICAN CEMENT  
Project Number: 1210465-022-AC  
Permit Status: FINAL  
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.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.022.AC.F_pdf.zip)

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

Permit project documents 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, Office of Permitting and Compliance.

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

**Regards,**

**Lynn Searce**

Office of Permitting and Compliance (OPC)

Division of Air Resources Management

850-717-9025

*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.*



**Scearce, Lynn**

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**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Tuesday, July 26, 2011 12:30 PM  
**To:** Scearce, Lynn  
**Subject:** Read: Suwannee American Cement, No. 1210465-022-AC, Final Permit  
**Attachments:** ATT00001

**Scearce, Lynn**

---

**From:** DeVore, Christy  
**Sent:** Monday, July 25, 2011 4:39 PM  
**To:** Scearce, Lynn  
**Subject:** FW: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT;  
1210465-022-AC

---

**From:** Crandall, Lea  
**Sent:** Monday, July 25, 2011 9:17 AM  
**To:** DeVore, Christy  
**Subject:** RE: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Good Morning,

No petitions have been filed.

Thanks,  
Lea

Lea Crandall  
Agency Clerk  
Office of General Counsel  
3900 Commonwealth Blvd., MS 35  
Tallahassee, FL 32399-3000  
Phone (850) 245-2212  
Fax: (850) 245-2303

Florida's Water - Ours to Protect: Check out the latest information on Florida Water Issues at  
<http://www.protectingourwater.org/> presented by the Florida Department of Environmental Protection.

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**From:** DeVore, Christy  
**Sent:** Monday, July 25, 2011 9:11 AM  
**To:** Crandall, Lea  
**Subject:** FW: SUWANNEE AMERICAN CEMENT, LLC - BRANFORD CEMENT PLANT; 1210465-022-AC

Any petitions received on this one?  
Thanks.

*Christy DeVore, P.E.*  
Professional Engineer II  
Portland Cement Industry Contact  
Division of Air Resource Management  
Office of Permitting and Compliance  
Minerals and Metals (M&M)  
2600 Blair Stone Road, MS#5505  
Tallahassee, FL 32399-2400  
Telephone (850) 717-9085  
FAX (850) 717-9001

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**From:** Friday, Barbara  
**Sent:** Wednesday, June 29, 2011 11:19 AM  
**To:** [tomm@vcsmc.com](mailto:tomm@vcsmc.com)  
**Cc:** [celsom@vcsmc.com](mailto:celsom@vcsmc.com); [jbhorton@vcnainc.com](mailto:jbhorton@vcnainc.com); [krishnac@vcsmc.com](mailto:krishnac@vcsmc.com); [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com); [chris@alachuacounty.us](mailto:chris@alachuacounty.us); [lmcshe2001@aol.com](mailto:lmcshe2001@aol.com); [long5892@bellsouth.net](mailto:long5892@bellsouth.net); [dmot51@aol.com](mailto:dmot51@aol.com); [commissioners@suwcounty.org](mailto:commissioners@suwcounty.org); [bocc@alachuacounty.us](mailto:bocc@alachuacounty.us); Strong, Greg; Kirts, Christopher; 'Kathleen Forney'; [abrams.heather@epamail.epa.gov](mailto:abrams.heather@epamail.epa.gov); [langston.david@epa.gov](mailto: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](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

**Scearce, Lynn**

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**From:** Microsoft Exchange  
**To:** tomm@vcsmc.com; celsom@vcsmc.com; krishnac@vcsmc.com  
**Sent:** Tuesday, July 26, 2011 10:00 AM  
**Subject:** Relayed: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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

[tomm@vcsmc.com](mailto:tomm@vcsmc.com)

[celsom@vcsmc.com](mailto:celsom@vcsmc.com)

[krishnac@vcsmc.com](mailto:krishnac@vcsmc.com)

Subject: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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Sent by Microsoft Exchange Server 2007

**Scearce, Lynn**

---

**From:** Microsoft Exchange  
**To:** [jbhorton@vcnainc.com](mailto:jbhorton@vcnainc.com)  
**Sent:** Tuesday, July 26, 2011 10:00 AM  
**Subject:** Relayed: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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

[jbhorton@vcnainc.com](mailto:jbhorton@vcnainc.com)

Subject: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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Sent by Microsoft Exchange Server 2007

**Scearce, Lynn**

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**From:** Microsoft Exchange  
**To:** commissioners@suwcounty.org  
**Sent:** Tuesday, July 26, 2011 9:59 AM  
**Subject:** Relayed: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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

[commissioners@suwcounty.org](mailto:commissioners@suwcounty.org)

Subject: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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Sent by Microsoft Exchange Server 2007

**Scearce, Lynn**

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**From:** Microsoft Exchange  
**To:** mlee@kooglerassociates.com  
**Sent:** Tuesday, July 26, 2011 9:59 AM  
**Subject:** Relayed: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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

[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)

Subject: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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Sent by Microsoft Exchange Server 2007

**Scearce, Lynn**

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**From:** Microsoft Exchange  
**To:** chris@alachuacounty.us; bocc@alachuacounty.us  
**Sent:** Tuesday, July 26, 2011 9:59 AM  
**Subject:** Relayed: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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

[chris@alachuacounty.us](mailto:chris@alachuacounty.us)

[bocc@alachuacounty.us](mailto:bocc@alachuacounty.us)

Subject: Suwannee American Cement, No. 1210465-022-AC, Final Permit

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Sent by Microsoft Exchange Server 2007