



Alachua County Environmental Protection Department

Chris Bird, Director

October 28, 2010

Ms. Trina Vielhauer
Chief, Bureau of Air Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
MS #5505
Tallahassee, FL 32399-2400

RECEIVED
OCT 29 2010
BUREAU OF
AIR REGULATION

Re: Comment from Alachua County Environmental Protection Department Regarding Notice to Issue Air Permit, Suwanee American Cement, Branford Cement Plant, Suwanee Florida Project No. 11210465-020-AC

Dear Ms. Vielhauer:

The Alachua County Environmental Protection Department (ACEPD) is submitting the following comment regarding the above referenced Notice to Issue Air Permit for the Suwanee American Cement Plant, Branford Cement Plant for their proposal to co-fire alternative fuels with coal for a trial period as fuel for the cement kiln.

Several alternative fuels are proposed including non-chlorinated agricultural plastics, tire derived fuel (TDF) material, roofing shingles, clean woody biomass and carpet derived fuel. ACEPD is concerned about the potential for the production and emission of dioxins and furans from the use of these alternative fuels especially TDF, roofing shingles and agricultural plastics. While the draft air permit specifies that a stack test will be performed for dioxins and furans while co-firing with TDF, there is no requirement to perform a dioxin/furan stack test while co-firing roofing shingles and agricultural plastics. We are concerned that the composition of roofing shingles may contain chlorinated compounds which may result in the formation of dioxins and furans in the emissions. In addition, while the draft permit specifies the use of "non-chlorinated" agricultural plastics such as HDPE for the alternative fuel in the test, ACEPD is concerned that other types of plastic materials from agricultural operations containing chlorinated polymers may become mixed in the agricultural plastic waste stream and increase the potential for the formation of chlorinated dioxins/furans in the emissions.

ACEPD recommends that either additional stack testing for dioxins/furans during the roofing shingles and agricultural plastics co-firing test be required in the permit or there be some requirement to test or determine that no chlorinated materials are present in these raw materials.

Sincerely,

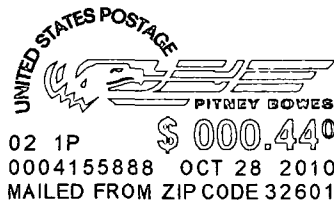
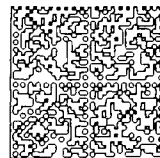
John J. Mousa, Ph.D.
Pollution Prevention Manager

CC: Chris Bird, Director ACEPD Gus Olmos, ACEPD Christy Devore, FDEP



**ALACHUA COUNTY
ENVIRONMENTAL PROTECTION**

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