

# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

May 21, 2010

*Sent by Electronic Mail – Received Receipt Requested*

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

Re: Project No. 1210465-020-AC  
Request for Additional Information  
Alternative Fuel Materials Testing, SAC Cement Kiln 1  
Branford, Suwannee County

Dear Mr. Messer:

On April 28, 2010, the Department received your application and sufficient fee for an air construction permit to allow the use of agricultural film, tire-derived fuel, manufacturer reject roofing shingles, used roofing shingles, clean woody biomass, agricultural fibrous organic byproducts (i.e. peanut hulls, rice hulls, corn husks, citrus peels, cotton gin byproducts and animal bedding), pre-consumer reject paper, post-consumer waste paper and carpet derived fuel for a trial period at Suwannee American Cement Plant. The facility is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The request is incomplete. In order to continue processing your request, please provide the additional information requested below. Should your response to any of the requested items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

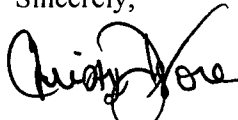
1. Will the tire-derived fuel have the steel belts removed prior to delivery to SAC? What size will the tire-derived fuel be to go through the port hole?
2. What qualifies the manufacturer reject roofing shingles as asbestos free material (i.e. % by weight)?
3. Are there any federal requirements that prohibit firing roofing shingles containing less than 1% asbestos?
4. The Department will prohibit chromated copper arsenate (CCA) treated lumber from being burned. Please comment.
5. Does the request for the pre-consumer reject paper include bleached paper? What are the chlorine content and hydrochloric (HCL) emissions?
6. Other than office copy paper, what is post-consumer waste paper? Please describe the waste paper haulers and how this material will be received. Also include the chlorine content and hydrochloric (HCL) emissions.
7. Please provide specifications on the carpet-derived fuel including HCL emissions. Please submit the Lehigh cement plant permit and other permits, which authorize carpet-derived fuel.

8. Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C publish the enclosed Notice of Application in the legal advertisement section of a newspaper of general circulation meeting the requirements of Sections 50.011 and 50.031, F.S. in the area affected by this project and provide proof of publication.

The above information is requested pursuant to the following F.A.C. regulations: Rule 62-4.050 (Procedures to Obtain Permits and Other Authorizations; Applications); 62-4.055 (Permit Processing); 62-4.070 (Standards for Issuing or Denying Permits; Issuance; Denial); 62-4.120 (Construction Permits); 62-204.800 (Federal Regulations Adopted by Reference); 62-212.300 (Permits Required); 62-210.370 (Emissions Computations and Reporting); 62-210.900 (Forms and Instructions); 62-212.300 (General Preconstruction Review); and 62-212.400 (Preventions of Significant Deterioration). All applications for a Department permit must be certified by a professional engineer registered in the State of Florida pursuant to Rule 62-4.050(3), F.A.C. This requirement also applies to responses to Department requests for additional information of an engineering nature. For any material changes to the application, please include a new certification statement by the authorized representative or responsible official.

We will resume processing your application after receipt of the requested information. You are reminded that Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information. If you have any questions regarding this matter, please contact Christy DeVore at 850-921-8968.

Sincerely,



Christy DeVore, P.E.  
New Source Review Section  
Bureau of Air Regulation

TV/jfk/scd

Enclosure

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

## NOTICE OF APPLICATION

STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Project No. 1210465-020-AC

Suwannee American Cement, Suwannee American Cement Plant  
Suwannee County, Florida

The Department of Environmental Protection announces receipt of an application for an air construction permit from Suwannee American Cement. The application proposes a trial burn of alternative fuels at the existing Suwannee American Cement Plant, which is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The application requests authorization of a temporary trial burn of agricultural film, tire-derived fuel, manufacturer reject roofing shingles, used roofing shingles, clean woody biomass, agricultural fibrous organic byproducts (i.e. peanut hulls, rice hulls, corn husks, citrus peels, cotton gin byproducts and animal bedding), pre-consumer reject paper, post-consumer waste paper and carpet derived fuel in existing Kiln No. 1. The purpose of the trial is to evaluate the operation feasibility of supplementing coal in the kiln with these various alternative fuels. During the trial period the following emissions will be continuously monitored: nitrogen oxides, sulfur dioxide, volatile organic compounds (as total hydrocarbons) and opacity. Particulate matter and carbon monoxide will be monitored through stack testing. Mercury analysis will be performed on the material. The results of the trial burn may be used to support a subsequent request for permanent authorization to fire one or more of these alternative fuels.

The initial application was received on April 28, 2010. The application is under review by the Department and is available for public inspection during normal business hours from 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following offices:

Department of Environmental Protection  
Bureau of Air Regulation  
111 South Magnolia Drive, Suite 4  
Tallahassee, Florida 32399-2400  
Telephone: 850/921-8968  
Fax: 850/921-9533

Department of Environmental Protection  
Northeast District Office  
7825 Baymeadows Way, Suite B200  
Jacksonville, Florida 32256-7590  
Telephone: 904/807-3300  
Fax: 904/448-4362

The application can be accessed at the Department's website at:

**<http://www.dep.state.fl.us/air/emission/apds/default.asp>**

Enter the permit number 1210465-020-AC and click on view additional scanned files.

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Friday, May 21, 2010 2:49 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'krishnac@suwanneecement.com'; 'mlee@kooglerassociates.com'; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Suwannee America Cement (1210465-020-AC)  
**Attachments:** RAI 1210465-020-AC.pdf

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

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

## Livingston, Sylvia

---

**From:** Messer Tom [tomm@suwanneecement.com]  
**Sent:** Friday, May 21, 2010 3:12 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: Suwannee America Cement (1210465-020-AC)

Received.

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, May 21, 2010 2:49 PM  
**To:** Messer Tom  
**Cc:** Horton Joe; Cole Krishna; mlee@kooglerassociates.com; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Suwannee America Cement (1210465-020-AC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

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

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

## Livingston, Sylvia

---

**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Saturday, May 22, 2010 3:37 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: Request for Additional Information: Suwannee America Cement (1210465-020-AC)

received,  
thanks

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, May 21, 2010 2:49 PM  
**To:** tomm@suwanneecement.com  
**Cc:** jbhorton@suwanneecement.com; krishnac@suwanneecement.com; mlee@kooglerassociates.com; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; DeVore, Christy; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Request for Additional Information: Suwannee America Cement (1210465-020-AC)

Dear Sir/Madam:

Please send a "reply" message verifying receipt of the attached document(s); 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". We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document(s).

The document(s) may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible.

The 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>> .

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. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record.

Thank you,

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

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*