



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

August 21, 2009

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. 1210465-016-AC
Fifth Request for Additional Information
Alternative Fuel Materials Testing, SAC Cement Kiln 1
Branford, Suwannee County

Dear Mr. Messer:

On July 24, 2009, the Department of Environmental Protection (Department) received your response to our fourth request for additional information (RAI) that was dated March 20, 2009. After review of your response, the Department requests submittal of the additional information indicated below to address concerns with regard to the use of automobile shredder residue (autofluff) as an alternative fuel at SAC prior to processing the application. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application forms.


1. The response included a list of quality assurance/quality control (QA/QC) procedures (Gerdau Ameristeel Wilton Environmental System Procedure) to address the regulatory requirements under the Toxic Substances Control Act (TSCA), procedures to remove mercury-containing devices and monitoring provisions to ensure exclusion of these materials and compliance with the regulations. Please submit a similar list of QA/QC procedures specific to the SAC plant that will be provided to autofluff suppliers (such as Gerdau Ameristeel Jacksonville) that will ensure compliance with the regulations and successful materials segregation. As we discussed during the August 14th teleconference, specifically address the gap in the Wilton QA/QC procedures since Florida does not have regulations similar to Iowa's "demanufacturing" rule.
2. As we discussed during the August 14th teleconference, please describe in detail your proposal for an initial short-term operational test to determine the feasibility of storing, handling, charging and burning autofluff in the cement kiln.
 - a. Please identify: the temporary equipment that will be needed to conduct the test; the amount of autofluff that will be burned during the temporary operational test; the approximate number of days needed to conduct the test; sampling and analysis methods for contaminants in autofluff to be used during the test; sampling frequency; air monitoring data to be collected during the test; operational parameters monitored during the test (e.g., autofluff feed rate, coal firing rate, cement production rate, etc.).

- b. For the proposed amount of autofluff, compare the estimated emissions from burning autofluff with an equivalent amount of coal (based on heat input rate) that it will displace.
- c. Will Gerdau Ameristeel Jacksonville be the supplier for the test? Discuss how the supplier will obtain EPA Region 4 approval for handling the autofluff for the test in accordance with the TSCA regulations. Will the supplier request an exemption from the TSCA regulations?

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 Susan DeVore at 850-921-8968.

Sincerely,


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

For

TV/jfk/sd

cc: Mr. Tom Messer, SAC (tomm@suwanneecement.com)
Mr. Joe Horton, SAC (jbhorton@suwanneecement.com)
Mr. Celso Martini, VCSMC (celsom@vcsmc.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)

Livingston, Sylvia

From: Livingston, Sylvia
Sent: Friday, August 21, 2009 12:00 PM
To: 'tomm@suwanneecement.com'
Cc: 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'mlee@kooglerassociates.com'; Strong, Greg; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; Koerner, Jeff; DeVore, Susan
Subject: RAI - 1210465-016-AC (Suwannee American Cement)
Attachments: RAI 1210465-016-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)
850/921-9506
sylvia.livingston@dep.state.fl.us

Tracking: