



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 28, 2009

Electronic Mail – Received Receipt Requested

tomm@suwanneecement.com

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

Re: **Request for Additional Information - Reminder**
Project No. 1210465-016-AC
Suwannee American Cement Plant
Alternative Fuel Materials Testing, SAC Cement Kiln 1

Dear Mr. Messer:

On September 29, 2008, the Department received your application and sufficient fee for an air construction permit to allow the use of ASR, also known as "auto fluff" 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 application was deemed incomplete and the Department requested additional information on March 20, 2009 that would allow continued processing of your application. We have not yet received the requested additional information. Rule 62-4.055(1) of the Florida Administrative Code (F.A.C.) requires the following:

*"The applicant shall have **ninety days** after the Department mails a timely request for additional information to submit that information to the Department. If an applicant requires more than ninety days in which to respond to a request for additional information, the applicant may notify the Department in writing of the circumstances, at which time the application shall be held in active status for one additional period of up to ninety days. Additional extensions shall be granted for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested additional information shall constitute good cause. Failure of an applicant to provide the timely requested information by the applicable deadline shall result in denial of the application."*

It has been more than 65 days since our request for additional information (copy attached). You are reminded that the permit processing time clock has stopped for this project and that we will not continue our review until we receive the additional information. If you require a period of time in addition to the 90 days allowed by rule, please submit a written request indicating the amount of time necessary. If you fail to provide the additional information or request additional time to submit the additional information, the Department will deny your application for air permit. If you have any questions regarding this matter, please contact the project engineer, Susan DeVore, at 850/921-8968.

REQUEST FOR ADDITIONAL INFORMATION - REMINDER

Sincerely,



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

This letter was sent to the following people by electronic mail with received receipt requested.

Joe Horton, SAC (jbhorton@suwanneecement.com)
Max Lee, Ph.D. P.E., Koogler & Associates (mlee@kooglerassociates.com)
Greg Strong, DEP NED (greg.strong@dep.state.fl.us)
Chris Kirts, DEP NED (christopher.kirts@dep.state.fl.us)
Kathy Forney, EPA Region 4 (forney.kathleen@epa.gov)
Heather Abrams, EPA Region 4 (abrams.heather@epa.gov)
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

JFK/scd



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kotkamp
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March 20, 2009

Sent by Electronic Mail -- Received Receipt Requested

tomm@suwanneecement.com

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

Re: Project No. 1210465-016-AC
Fourth Request for Additional Information
Alternative Fuel Materials Testing, SAC Cement Kiln 1
Branford, Suwannee County

Dear Mr. Messer:

On February 19, 2009, the Department of Environmental Protection (Department) received your response to our third request for additional information (RAI) that was dated February 13, 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 below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application forms.

1. Polychlorinated biphenyls (PCB) have been detected in autofluff. The PCB may come from variety of sources including: insulating materials in capacitors for appliances manufactured prior to 1979, insulating materials in transformers, softening agents for plastics, hydraulic fluids, lubricants and heat transfer coolants. Although there are several programs to eliminate PCB from entering the autofluff stream, PCB levels continue to be detected in autofluff. We have information that regulatory requirements under the Toxic Substances Control Act (TSCA) created issues with autofluff as an acceptable alternative fuel. It is our understanding that the autofluff supplier must certify that all chemical substances in each autofluff shipment complies with all applicable rules and orders under the TSCA. Please provide additional information regarding the quality assurance and quality control procedures that will be used to ensure that the autofluff will not contain significant amounts of PCB and comply with the TSCA provisions. Provide examples of the documentation that will be used to satisfy the federal requirements for certification, testing, record keeping and reporting under 40 CFR 761.185 and 193.
2. For any trial of autofluff, it will be necessary to monitor the mercury emissions from the kiln. Please provide cost estimates for the use and analysis of mercury sorbent traps and the use of a continuous emissions monitoring system to measure and record mercury emissions. The cost estimates should consider appropriate monitoring for each of the various requested operating scenarios (autofluff/coal

and raw mill on, autofluff/coal and raw mill off, autofluff/coal/fly ash and raw mill on, autofluff/coal/fly ash and raw mill off, etc.) for the duration of the trial.

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

TV/jfk/sd

cc: Joe Horton, SAC (jbhorton@suwanneecement.com)
Max Lee, Ph.D. P.E., K&A (mlee@kooglerassociates.com)
Greg Strong, DEP NED (greg.strong@dep.state.fl.us)
Chris Kirts, DEP NED (christopher.kirts@dep.state.fl.us)
Kathy Forney, EPA Region 4 (forney.kathleen@epa.gov)
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: Thursday, May 28, 2009 11:55 AM
To: 'tomm@suwanneecement.com'
Cc: 'jbhorton@suwanneecement.com'; 'mlee@kooglerassociates.com'; Strong, Greg; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; Gibson, Victoria; DeVore, Susan; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI Reminder - Suwannee American Cement Plant (1210465-016-AC)
Attachments: RAI Reminder 1210465-016-AC.pdf; RAI 1210465-016-AC attachment.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:

Livingston, Sylvia

From: Messer Tom [tomm@suwanneecement.com]
Sent: Thursday, May 28, 2009 1:37 PM
To: Livingston, Sylvia
Subject: RE: RAI Reminder - Suwannee American Cement Plant (1210465-016-AC)

In process Thanks!!

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, May 28, 2009 11:55 AM
To: Messer Tom
Cc: Horton Joe; mlee@kooglerassociates.com; Strong, Greg; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; Gibson, Victoria; DeVore, Susan; Koerner, Jeff; Walker, Elizabeth (AIR)
Subject: RAI Reminder - Suwannee American Cement Plant (1210465-016-AC)

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Thank you,

Sylvia Livingston
Bureau of Air Regulation
Division of Air Resource Management (DARM)
850/921-9506
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: Abrams.Heather@epamail.epa.gov
Sent: Thursday, May 28, 2009 11:57 AM
To: Livingston, Sylvia
Subject: Re: RAI Reminder - Suwannee American Cement Plant (1210465-016-AC)
Attachments: RAI Reminder 1210465-016-AC.pdf; RAI 1210465-016-AC attachment.pdf

got it
Heather Abrams
Air Permits Section
U.S. EPA - Region 4
61 Forsyth St. SW
Atlanta, Georgia 30303

Phone: 404-562-9185
Fax: 404-562-9019

"Livingston,
Sylvia"
<Sylvia.Livingston@dep.state.fl.us>

05/28/2009 11:54 AM

To
<tomm@suwanneecement.com>
cc
<jbhorton@suwanneecement.com>,
<mlee@kooglerassociates.com>,
"Strong, Greg"
<Greg.Strong@dep.state.fl.us>,
"Kirts, Christopher"
<Christopher.Kirts@dep.state.fl.us>,
Kathleen
Forney/R4/USEPA/US@EPA, Heather
Abrams/R4/USEPA/US@EPA, "Gibson,
Victoria"
<Victoria.Gibson@dep.state.fl.us>
, "DeVore, Susan"
<Susan.DeVore@dep.state.fl.us>,
"Koerner, Jeff"
<Jeff.Koerner@dep.state.fl.us>,
"Walker, Elizabeth \ (AIR\)"
<Elizabeth.Walker@dep.state.fl.us>

Subject
RAI Reminder - Suwannee American
Cement Plant (1210465-016-AC)