

# 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

November 2, 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  
Second Reminder for Additional Information due November 19, 2009  
Alternative Fuel Materials Testing, Long-Term SAC Cement Kiln 1  
Branford, Suwannee County

Dear Mr. Messer:

On August 21, 2009, the Department of Environmental Protection (Department) requested additional information on Project No. 1210465-016-AC for the long-term testing of auto fluff as an alternative fuel. In brief, this letter requested two sets of information: (1) the quality assurance/quality control (QA/QC) procedures for auto fluff suppliers, and (2) details of the proposed short-term operational trial of auto fluff to determine operational feasibility. On September 10, 2009, we received your application for an air permit to conduct a short-term operational trial burn. We issued a draft permit package on September 18, 2009 for the temporary short-term trial. Therefore, we consider the second set of questions in the August 21<sup>st</sup> request to be answered. This is a reminder that we are still awaiting the additional information related to the QA/QC procedures for auto fluff suppliers. Please submit the additional information indicated below or request an additional 90 days to provide the requested information. Should your response require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application forms.


1. Your previous response included a list of 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 14<sup>th</sup> teleconference, specifically address the gap in the Wilton QA/QC procedures since Florida does not have regulations similar to Iowa's "demanufacturing" rule.

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. The response deadline is **November 19, 2009**. If you want to use information from the short-term trial burn to prepare the response, please request additional time if necessary. 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: 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)

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Monday, November 02, 2009 10:35 AM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'krishnac@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 - Branford (1210465-016-AC)  
**Attachments:** RAI Reminder 1210465-016-AC-2.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](mailto:sylvia.livingston@dep.state.fl.us)

Tracking:

## Livingston, Sylvia

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**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Monday, November 02, 2009 5:55 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI Reminder: Suwannee American Cement - Branford (1210465-016-AC)

received.

thanks.

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**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, November 02, 2009 10:35 AM  
**To:** tomm@suwanneecement.com  
**Cc:** jbhorton@suwanneecement.com; celsom@vcsmc.com; krishnac@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 - Branford (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](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.*

\_\_\_\_\_ NOD32 3985 (20090403) Information \_\_\_\_\_