



KOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
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October 15, 2010

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BUREAU OF
AIR REGULATION

Mr. Jeff Koerner, Administrator
New Source Review Section
Florida Dept. of Environmental Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

**RE: *Request for Time Extension to Submit Revised AC Permit Application Information
Suwannee American Cement; Branford Cement Plant, Project 1210465-016-AC***

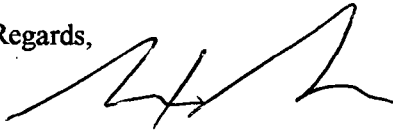
Dear Mr. Koerner:

On behalf of Suwannee American Cement (SAC), I am requesting an additional 60 days for the Department to make a determination on this application. Within this time period, SAC intends to submit a substantially revised application including additional information on the research and development trial of auto-derived fuel (ADF) under permit 1210465-016-AC. SAC believes that the completed initial short-term trial under permit 1210465-017-AC indicated ADF is a potentially viable fuel and that the method of treatment is environmentally sound (e.g., reduction of land disposal) and combined with replacement of conventional fuel (i.e., coal) (e.g., reduction of greenhouse gases) provides additional co-benefits to the environment. Furthermore, SAC believes that while the short term trial provided valuable information to the viability of ADF, additional information should be provided to ensure all aspects of concern from the Department are addressed. SAC acknowledges that a substantially revised application will reset the 30-day completeness review clock and the 90-day determination clock for this project on the date of receipt by the Department.

We sincerely appreciate the efforts of the Department to review this project information and provide its comments of the project such that a high level of reasonable assurance is provided and that the project meets all the necessary requirements of the Department.

Please feel free to contact me at (352) 377-5822 or mlee@koooglerassociates.com or Krishna Cole, Suwannee American Cement at (386) 935-5023 or krishnaC@suwanneecement.com, if you have any questions regarding this submittal.

Regards,



Max Lee, PhD., P.E.
Senior Engineer
KOOGLER AND ASSOCIATES, INC.

cc: Krishna Cole, Suwannee American Cement