



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

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: Horton Joe [JBHorton@vcnainc.com]
Sent: Friday, March 20, 2009 1:25 PM
To: Livingston, Sylvia
Cc: Messer Tom
Subject: RE: RAI - 1210465-016-AC (Suwannee American Cement)

This email and attachment was received.

Thanks,
Joe Horton

From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Friday, March 20, 2009 12:59 PM
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; Walker, Elizabeth (AIR)
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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

<<RAI 1210465-016-AC.pdf>>

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verifying receipt,

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4/10/2009