



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blairstone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor  
Jeff Kottkamp  
Lt. Governor  
Michael W. Sole  
Secretary

February 13, 2009

*Electronically sent – Received Receipt Requested*

[tomm@suwanneecement.com](mailto:tomm@suwanneecement.com)

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

Re: DEP File No. 1210465-016-AC (PSD-FL-259G)  
Alternative Fuel Materials Testing – SAC Cement Kiln  
Branford, Suwannee County

Dear Mr. Messer:

On January 15, 2009, the Department of Environmental Protection (Department) received your response to our second request for additional information (RAI) that was dated December 10, 2008.

After review of your response to the Departments' second RAI and Pursuant to Rules 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information indicated below with regard to the use of automobile shredder residue (ASR) 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. Some of the questions are related to the Departments' Tallahassee and District staffs site visit to the Gerdau ASR facility on February 3, 2009.

1. The Department would like additional information on the Quality Assurance (QA) and Quality Control (QC) procedures that are planned during the handling and processing of the ASR at SAC. For instance, does SAC plan on testing ASR for material properties, especially heavy metals, prior to introduction into the kiln? Does SAC plan on awaiting the ASR test results before introducing the ASR into the kiln system?
2. What is the wet versus dry British thermal unit (Btu) values of the ASR? Does SAC plan on using dry or wet ASR as an alternative fuel in the kiln system?
3. Because of the high mercury content of the ASR, does SAC plan on reducing the amount of high carbon fly ash fed into the kiln system during testing to offset the ASR mercury content?
4. If testing of ASR as an alternative proves successful, would SAC be willing to reduce its current mercury limit of 97 pounds per year to a lower limit in any resulting final permit resulting from alternative fuel testing program?

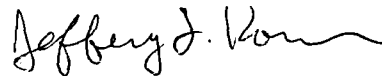
Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to


Mr. Tom Messer  
DEP File No. 1210465-016-AC  
Page 2

Department requests for additional information of an engineering nature. Please note that per Rule 62-4.055(1): *“The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department..... Failure of an applicant to provide the timely requested information by the applicable date **shall** result in denial of the application.”*

If you have any questions regarding this matter, please contact David Read at 850-414-7268 or Susan DeVore at 850-921-8968.

Sincerely,



 Trina Vielhauer, Bureau Chief  
Bureau of Air Regulation  
Division of Air Resource Management

TV/dr

Cc: Joe Horton, SAC: [jhorton@suwanneecement.com](mailto:jhorton@suwanneecement.com)  
Greg Strong, DEP NED: [greg.strong@dep.state.fl.us](mailto:greg.strong@dep.state.fl.us)  
Chris Kirts, DEP NED: [christopher.kirts@dep.state.fl.us](mailto:christopher.kirts@dep.state.fl.us)  
Max Lee, Ph.D. P.E., K&A: [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
Kathy Forney, EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)  
Heather Abrams, EPA Region 4: [abrams.heather@epa.gov](mailto:abrams.heather@epa.gov)

## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Friday, February 13, 2009 1:14 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; Strong, Greg; Kirts, Christopher;  
'mlee@kooglerassociates.com'; 'forney.kathleen@epa.gov';  
'abrams.heather@epamail.epa.gov'  
**Subject:** RAI - Suwannee American Cement (1210465-016-AC/ PSD-FL-259G)  
**Attachments:** 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](mailto:sylvia.livingston@dep.state.fl.us)

## Livingston, Sylvia

---

**From:** Messer Tom [tomm@suwanneecement.com]  
**Sent:** Monday, February 23, 2009 5:03 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI - Suwannee American Cement (1210465-016-AC/ PSD-FL-259G)

Sylvia,  
I have received the RAI. You should be receiving or response any day.

Best Regards,  
Tom

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Monday, February 23, 2009 1:29 PM  
**To:** Messer Tom  
**Subject:** FW: RAI - Suwannee American Cement (1210465-016-AC/ PSD-FL-259G)

Dear Mr. Messer,

We have not received confirmation that you were able to access the documents attached to this February 13th e-mail. Please confirm receipt by opening the attachment and clicking on the link to the permit documents, and sending a reply to me.

The Division of Air Resource Management is sending electronic versions of these documents rather than sending them Return Receipt Requested via the US Postal service. Your "receipt confirmation" reply serves the same purpose as tracking the receipt of the signed "Return Receipt" card from the US Postal Service. Please let me know if you have any questions.

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.*

**From:** Livingston, Sylvia  
**Sent:** Friday, February 13, 2009 1:14 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; Strong, Greg; Kirts, Christopher; 'mlee@kooglerassociates.com'; 'forney.kathleen@epa.gov'; 'abrams.heather@epamail.epa.gov'  
**Subject:** RAI - Suwannee American Cement (1210465-016-AC/ PSD-FL-259G)

Dear Sir/Madam:

## Livingston, Sylvia

---

**From:** Horton Joe [JBHorton@vcnainc.com]  
**Sent:** Monday, February 16, 2009 8:31 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: RAI - Suwannee American Cement (1210465-016-AC/ PSD-FL-259G)

The Document was received and was able to be read.

Thanks,  
Joe Horton

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, February 13, 2009 1:14 PM  
**To:** Messer Tom  
**Cc:** Horton Joe; Strong, Greg; Kirts, Christopher; mlee@kooglerassociates.com; forney.kathleen@epa.gov; abrams.heather@epamail.epa.gov  
**Subject:** RAI - Suwannee American Cement (1210465-016-AC/ PSD-FL-259G)

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)

*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.*