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BUREAU OF
AIR REGULATION

KA 624-08-04
December 14, 2010

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

**RE: *Withdrawal of Air Construction Permit Application
Suwannee American Cement; Branford Cement Plant, 1210465-016-AC***

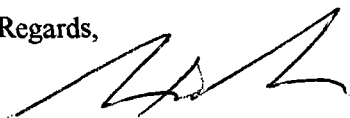
Dear Mr. Koerner:

On behalf of Suwannee American Cement (SAC) I am requesting to withdraw the above air construction permit application. In follow up to our phone call on Friday, December 10, 2010, SAC is working with the David J. Joseph Company to further evaluate auto derived fuel (ADF) and to develop a source control plan with well-defined material specifications. SAC will work with the David J. Joseph Company to develop this plan and will conduct additional studies that are expected to provide data to support ADF specification. After SAC collects sufficient data and a workable source control plan has been developed, SAC intends to resubmit an application based on the results of these studies. As these studies progress SAC plans to continue to update and work with the Department on this matter and to continue to promote the study of energy recovery in cement kilns as a viable alternative to land filling.

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) combined with replacement of conventional fuel (i.e., coal) (e.g., reduction of greenhouse gases) provides additional co-benefits to the environment. Furthermore, both SAC and David J. Joseph are building an excellent working relationship and understand that the success of these studies depends on a high level of communication.

We sincerely appreciate the substantial efforts of the Department on this project and look forward to bringing this project to fruition through a re-submittal application in the near future. Please feel free to contact me at (352) 377-5822 or mlee@kooglerassociates.com or Krishna Cole, Suwannee American Cement at (386) 935-5023 or krishnaC@suwanneecement.com.

Regards,



Max Lee, PhD., P.E.

President
KOOGLER AND ASSOCIATES, INC.

cc: Celso Martini, VCNA/Suwannee American Cement
Tom Messer, VCNA/Suwannee American Cement
Krishna Cole, VCNA/Suwannee American Cement
Eric Logsdon, David J. Joseph
Brandon Freeman, David J. Joseph
Ron Lehan, David J. Joseph
Christopher Kirts, FDEP Northeast District Air Division