

Florida Department of  
Environmental Protection

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**Memorandum**

To: Joseph Kahn, Division of Air Resource Management  
Through: Trina Vielhauer, Bureau of Air Regulation  
From: Jeff Koerner, New Source Review Section  
Date: October 19, 2009  
Subject: Final Minor Source Air Construction Permit  
Project No. 1210465-017-AC  
Suwannee American Cement, LLC, Branford Cement Plant  
Temporary Short-Term Trial of Auto Fluff

Attached for your review is a final minor air construction permit package, which authorizes a temporary trial to co-fire auto fluff with coal in the existing Kiln 1 system. This authorization is only for a temporary short-term trial (a maximum of 30 days) to burn no more than 1200 tons of auto fluff to determine whether this practice is feasible and practical for further consideration as an alternative fuel for the cement kiln. The attached Final Determination summarizes the publication and comment process. There are no pending petitions for administrative hearings or extensions of time in which to file a petition for an administrative hearing. I recommend your approval of the attached final permit for this project.

Attachments

**Permit File Scanning Request from Elizabeth**

Priority:  -ASAP (Public Records Request, etc.)  -Place in Normal Scanning Queue

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
1210965	017	AC		SEP 15 2010	

- File Approved For Disposal     
  Correspondence   
  Intent   
  Permit   
  Draft  
 Return File to BAR     
  Amendment   
  Application   
  OGC   
  Proposed

Document Date 10-26-09

## FINAL DETERMINATION

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### PERMITTEE

Suwannee American Cement, LLC  
5117 U.S. Highway 27  
Branford, Florida 32008

### PERMITTING AUTHORITY

Florida Department of Environmental Protection (Department)  
Division of Air Resource Management  
Bureau of Air Regulation, New Source Review Section  
2600 Blair Stone Road, MS #5505  
Tallahassee, Florida 32399-2400

### PROJECT

Air Permit No. 1210465-017-AC  
Minor Air Construction Permit  
Temporary Short-Term Trial of Auto Fluff  
Branford Cement Plant

This is the final air construction permit, which authorizes a temporary short-term trial to co-fire auto fluff in the existing Kiln 1 system. This authorization is only for a temporary short-term trial to determine whether this practice is feasible and practical for further consideration as an alternative fuel for the cement kiln.

### NOTICE AND PUBLICATION

The Department distributed a draft minor air construction permit package on September 18, 2009. The applicant published the Public Notice in The Suwannee Democrat on September 25, 2009. The Department received the proof of publication on October 2, 2009. No requests for administrative hearings or requests for extensions of time to file a petition for administrative hearing were received.

### COMMENTS

No comments on the Draft Permit were received from the EPA Region 4 Office or the applicant. On October 9, 2009, the Department received comments from Mr. Thomas G. Ellison of Branford. The following summarizes the comments and the Department's response.

*Comment:* "The Suwannee American Cement plant located in Branford, Florida has begun burning debris from junked cars, to include plastics, foam rubber and other toxic materials in an effort to save on fossil fuels. I believe this to be highly dangerous and potentially hazardous to the health of residents of the region. The Florida Dept of Environmental Protection also seems to think this practice to be hazardous. Please help to save this agricultural and environmentally beautiful area from pollution."

*Response:* The Division of Air Resource Management issued the draft permit to authorize a temporary trial burn of auto fluff at the Suwannee American Cement plant located in Branford. The plant proposes to co-fire auto fluff with coal in the existing cement kiln with the expectation that the auto fluff can offset some of the coal used at the facility. The company is optimistic that auto fluff will be a viable alternative fuel for coal and will also provide an alternative disposal method for this material which is currently sent to a landfill for disposal.

In response to the comments, the Division contacted the compliance authority for the facility that monitors live-feed emissions information from the Suwannee American Cement plant in Branford. It appears that the facility has recently been operating intermittently due to the economy. The Division also contacted the environmental manager at the facility. He indicated auto fluff has not been burned or brought on site. The plant is waiting for a final air permit from the Division to authorize a temporary trial burn. In addition, the source of the auto fluff, Gerdau Ameristeel, is waiting for EPA Region 4 authorization to supply the auto fluff for that trial burn.

## FINAL DETERMINATION

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For the proposed project, Suwannee American Cement is partnering with Gerdau Ameristeel, a mini-steel mill that recycles automobiles to make steel and rebar. Auto fluff may contain mercury without a rigorous program to remove mercury-containing materials such as switches. The two companies are working on quality control and quality assurance procedures that will produce auto fluff with negligible mercury content. Gerdau Ameristeel would develop a waste material into a lower-priced alternative fuel to displace a portion of the coal fired currently fired in the cement kiln at the Branford Cement Plant.

The purpose of the temporary trial burn is to determine whether the existing equipment at the Branford Cement Plant can adequately handle and feed auto fluff to the cement kiln. The draft permit limits the total amount of auto fluff to 1200 tons for the temporary trial burn, which would likely be fired in just a few days. The draft permit authorizes this amount of material to be fired over a maximum of 30 days to accommodate potential delays in deliveries of auto fluff or allow time for adjustments to processing equipment.

The Department will issue the final permit to authorize this temporary trial burn. Based on the information collected during this short-term trial, Suwannee American Cement would decide whether to pursue a temporary long-term trial burn of perhaps 6 months. Such a trial burn would consider a continuous emissions monitor to measure mercury emissions and equipment and techniques to control and reduce mercury emissions.

### CONCLUSION

The final action of the Department is to issue the permit with the minor changes, corrections and clarifications as described above.



# 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

## PERMITTEE

Suwannee American Cement, LLC  
5117 U.S. Highway 27  
Branford, Florida 32008

Air Permit No. 1210465-017-AC  
Permit Expires: October 15, 2010  
Minor Air Construction Permit

Authorized Representative:  
Mr. Tom Messer, Plant Manager

Branford Cement Plant  
Temporary Short-Term Trial of Auto Fluff

## PROJECT

Suwannee American Cement, LLC operates an existing Portland cement plant, which is categorized under Standard Industrial Classification No. 3241. The existing facility is located in Suwannee County at 5117 US Highway 27 in Branford, Florida. The UTM coordinates are: Zone 17, 321.4 km East and 3315.9 km North.

This is the final air construction permit, which authorizes a temporary short-term trial to co-fire auto fluff in the existing Kiln 1 system. This authorization is only for a temporary short-term trial to determine whether this practice is feasible and practical for further consideration as an alternative fuel for the cement kiln.

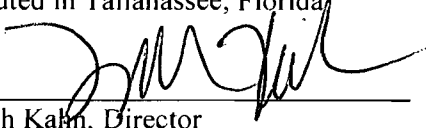
This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

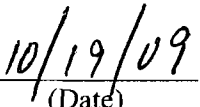
## STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

  
\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

  
\_\_\_\_\_  
(Date)

PERMIT


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 10/20/09 to the persons listed below.

- cc: Mr. Tom Messer, Suwannee American Cement, LLC (tomm@suwanneecement.com)
- Mr. Joe Horton, Suwannee American Cement, LLC (jbhorton@suwanneecement.com)
- Mr. Krishna Cole, Suwannee American Cement, LLC (krishnac@suwanneecement.com)
- Mr. Celso Martini, VCSMC (celsom@vcsmc.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. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

10/20/09  
(Date)

## PERMIT

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In addition, courtesy copies were also provided to the following persons by as indicated below.

### Electronic Mail

Chair, Suwannee County Board of County Commissioners (commissioners@suwcounty.org)  
Chair, Alachua County Board of County Commissioners (bocc@alachuacounty.us)  
Mr. Chris Bird, Director of Alachua County Department of Environmental Regulation (chris@alachuacounty.us)  
Mr. Tom Greenhalgh, Florida Geological Survey (tom.greenhalgh@dep.state.fl.us)  
Ms. Annette Long, Save Our Suwannee (long5892@bellsouth.net)  
Mr. Rob Brinkman, Sierra Club (RobBrinkman@cox.net)  
Ms. December McSherry (lmcsh2001@aol.com)  
Mr. Sverre Lindskold (Sverre@ichetucknee.org)  
Mr. Dave Bruderly (bruderly@aol.com)  
Ms. Kathy Cantwell (kacmd@aol.com)  
Mr. Thomas Ellison, (dmot51@aol.com)

### U.S. Mail

Mr. Ralph Ashodian  
Ms. Helen Beaty

**SECTION 1. GENERAL INFORMATION**

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**FACILITY DESCRIPTION**

The existing facility consists of a Portland cement manufacturing plant, the associated quarry, and raw material and cement handling operations. The plant combines raw materials and utilizes a preheater/calcliner kiln system with inline mill to produce cement clinker. The clinker is milled and combined with gypsum to produce Portland cement. The existing plant has a capacity of 210 tons per hour of dry preheater feed materials, 120 tons per hour of clinker production, and 150 tons per hour of Portland cement production. Annual production is limited to the following 12-month rolling totals: 1,648,578 tons per year of dry preheater feed materials; 965,425 tons per year of clinker production; and 1,191,360 tons per year of Portland cement production.

**PROPOSED PROJECT**

This permit authorizes a temporary trial period to co-fire auto fluff with coal to determine whether this is feasible and practical for further consideration as an alternative fuel for the cement kiln. This project will affect the following existing permitted emissions unit.

<b>Facility ID No. 1210465</b>	
<b>ID No.</b>	<b>Emission Unit Description</b>
004	Kiln No. 1 pyroprocessing system

**FACILITY REGULATORY CLASSIFICATION**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.



## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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1. Permitting Authority: All documents related to PSD applications for permits to construct or modify emissions units shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to construct minor sources of air pollution or to operate the facility shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); and Appendix C (Common Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. Kiln 1 System

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
004	Kiln No. 1 pyroprocessing system

#### EQUIPMENT

1. Temporary Equipment: The permittee is authorized to temporarily install and operate the following equipment for the trial: a Schenk feeder system to measure and dose auto fluff pneumatically through the existing fly ash injection feed lines; a diesel-powered shredder (approximately 610 hp); a diesel-powered screener (approximately 100 hp); a hopper; a conveyor; ductwork; and other miscellaneous equipment to unload, store and handle the auto fluff. Only diesel fuel shall be fired. [Application No. 1210465-017-AC]

#### PERFORMANCE RESTRICTIONS

2. Temporary Alternative Fuel: During the temporary trial period, the permittee is authorized to co-fire auto fluff with coal subject to the following:
  - a. For the trial period, permittee is authorized to accept auto fluff from Gerdau Ameristeel (supplier) that is processed only from automobiles. The permittee shall not accept any auto fluff processed from white goods (residential or industrial appliances).
  - b. For the trial period, permittee is authorized to accept auto fluff already sized to approximately 1" or less from shredding by the supplier.
  - c. Auto fluff shall be delivered in covered trucks and unloaded to a paved and covered area for storage. Auto fluff is typically 10% moisture by weight and is not expected to be a source of fugitive dust emissions. However, the plant shall apply water as necessary to prevent fugitive dust problems.
  - d. Prior to the first delivery of auto fluff to the Branford Cement Plant, the permittee shall obtain a copy of a written approval (or exemption or non-applicability determination) from the requirements of the Toxic Substance and Control Act to handle and transport the permitted amount of auto fluff to the cement plant for co-firing with coal.
  - e. For each shipment of auto fluff, the permittee shall obtain from the supplier the analytical results for a representative sample taken from the shipment for: the heating value, moisture content, volatiles, ash content, sulfur content, chlorine content, fluorine content, particle size, metals (beryllium, cadmium, chromium, lead, mercury and thallium) and polychlorinated biphenyls (PCB). Prior to the initial delivery of auto fluff, the permittee shall obtain a copy of the analytical results. For subsequent deliveries, the permittee shall obtain the analytical results as soon as they are available from the supplier.
  - f. At least one day prior to the initial delivery, the permittee shall provide written notification to the Bureau of Air Regulation and the Compliance Authority of: the expected date of delivery, the approximate amount of auto fluff to be delivered, the corresponding analytical results and a preliminary schedule for conducting the trial burn. For subsequent deliveries and within two days of each delivery, the permittee shall provide written notification to the Compliance Authority of the date of delivery and the amount of auto fluff delivered. As soon as the analytical results of the subsequent deliveries are available from the supplier, the permittee shall provide copies to the Bureau of Air Regulation and the Compliance Authority. Notifications may be made by letter, facsimile or e-mail.
  - g. Once auto fluff is first fired, the permittee shall complete the trial burn within 20 successive calendar days. If unforeseen problems delay the trial burn, the plant may continue the trial for an additional 10 successive calendar days after receiving written approval by the Bureau of Air Regulation.

[Application No. 1210465-017-AC and Rule 62-210.200(PTE), F.A.C.]

3. Restricted Operation: During the trial period, auto fluff shall be co-fired with coal in the existing cement kiln

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## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### A. Kiln 1 System

at a maximum rate of approximately 137 MMBtu per hour, which is roughly 30% of the maximum heat input rate when firing only coal. Based on previous analytical results for auto fluff, this is approximately 10 tons of auto fluff per hour. The purpose of the trial is to determine the operational and emissions impacts for a range of firing rates (e.g. 10 tons/hour, 7.5 tons/hour and 5.0 tons/hour). During the trial period, no more than 1200 tons of auto fluff shall be burned. [Application No. 1210465-017-AC and Rule 62-210.200(PTE), F.A.C.]

4. **Re-Shredding:** If problems with feeding the auto fluff occur, the permittee may re-shred and screen the auto fluff to obtain a more desirable size. The shredder/screener system shall be equipped with a water spray system to control fugitive dust emissions if necessary. Once it is determined that re-shredding on site is necessary, the permittee shall contact the supplier and require the supplier to re-shred subsequent shipments prior to delivery to the Branford Cement Plant. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]

### COMPLIANCE WITH EXISTING PERMIT CONDITIONS

5. **Existing Permits:** This permit supplements all existing valid permits. The permittee shall continue to comply with all applicable conditions from valid air construction and operation permits. [Rule 62-4.070(3), F.A.C.]

### MONITORING REQUIREMENTS

6. **Sampling:** During the trial period and at least once every four hours that auto fluff is fired, the permittee shall take a grab sample of as-fired auto fluff from the fuel feed belt in a one gallon container (approximate). [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
7. **Analyses:** The permittee shall combine all samples of as-fired auto fluff collected during a calendar day and take a representative composite sample. The composite sample shall be analyzed for: the heating value, moisture content, volatiles, ash content, sulfur content, chlorine content, fluorine content, particle size, metals (beryllium, cadmium, chromium, lead, mercury and thallium) and PCB. The permittee shall use the same analytical methods used by the auto fluff supplier so that a direct comparison can be made. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
8. **Emissions Monitoring:** For the trial period, the plant shall continue to monitor nitrogen oxides, sulfur dioxide and total hydrocarbon emissions with the existing certified continuous emissions monitoring systems, opacity with the existing certified continuous opacity monitoring system and CO emissions with the existing process monitors. For the trial period, mercury emissions shall be calculated based on the analytical results of the auto fluff and the material balance technique currently required by permit. For the full trial, an increase in mercury emissions shall not exceed 2.4 pounds (calculated as the difference between the actual co-firing of auto fluff with coal during the trial and the firing of an equivalent amount of coal for the same heat input rate). [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
9. **Process Monitoring:** For the trial, the plant will monitor: the average fuel feed rates, the average kiln feed rates, the average clinker production rates, the total fuel consumption rates, the temperature at the inlet to the baghouse, the number of times a trial was stopped and the reason for stopping a trial. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]

### RECORDS AND REPORTS

10. **Trial Burn Summary Report:** Within 90 days of completing the temporary trial, the permittee shall submit a report to the Bureau of Air Regulation and Compliance authority summarizing: the analytical results including a comparison between samples taken by the supplier and the permittee; problems with unloading storing or handling the auto fluff; problems with the material size and any re-shredding conducted on site; the emissions monitoring data; kiln production/process data; and a conclusion as to the feasibility and practicality of firing auto fluff as an alternative fuel. The report shall specifically identify any problems that occurred during the trial and the expected cause of the problem. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]

## SECTION 4. APPENDICES

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Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

## SECTION 4. APPENDIX A

### Citation Formats and Glossary of Common Terms

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#### CITATION FORMATS

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

##### Old Permit Numbers

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

##### New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number for that county  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor source federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a major Title V air operation permit

##### PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project number

##### Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

##### Code of Federal Regulations (CFR)

Example: [40 CFR 60.7]

Means: Title 40, Part 60, Section 7

#### GLOSSARY OF COMMON TERMS

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department’s database)

**BACT:** best available control technology

**bhp:** brake horsepower

**Btu:** British thermal units

**CAM:** compliance assurance monitoring

**CEMS:** continuous emissions monitoring system

**cfm:** cubic feet per minute

**CFR:** Code of Federal Regulations

## SECTION 4. APPENDIX A

### Citation Formats and Glossary of Common Terms

<b>CAA:</b> Clean Air Act	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CMS:</b> continuous monitoring system	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CO:</b> carbon monoxide	<b>NSPS:</b> New Source Performance Standards
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O&amp;M:</b> operation and maintenance
<b>COMS:</b> continuous opacity monitoring system	<b>O<sub>2</sub>:</b> oxygen
<b>DARM:</b> Division of Air Resource Management	<b>Pb:</b> lead
<b>DEP:</b> Department of Environmental Protection	<b>PM:</b> particulate matter
<b>Department:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>dscf:</b> dry standard cubic feet	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QA:</b> quality assurance
<b>EU:</b> emissions unit	<b>QC:</b> quality control
<b>F:</b> fluoride	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SIP:</b> State Implementation Plan
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPD:</b> tons/day
<b>ID:</b> identification	<b>TPH:</b> tons per hour
<b>kPa:</b> kilopascals	<b>TPY:</b> tons per year
<b>lb:</b> pound	<b>TRS:</b> total reduced sulfur
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	

## SECTION 4. APPENDIX B

### Common Conditions

The permittee shall comply with the following general conditions from Rule 624.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time then noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

## SECTION 4. APPENDIX B

### Common Conditions

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 624.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (not applicable);
  - b. Determination of Prevention of Significant Deterioration (not applicable); and
  - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - (a) The date, exact place, and time of sampling or measurements;
    - (b) The person responsible for performing the sampling or measurements;
    - (c) The dates analyses were performed;
    - (d) The person responsible for performing the analyses;
    - (e) The analytical techniques or methods used;
    - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.



## SECTION 4. APPENDIX B

### Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

#### EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

#### RECORDS AND REPORTS

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Emissions Computation and Reporting:**
  - a. **Applicability.** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance

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## SECTION 4. APPENDIX B

### Common Conditions

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with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) **Basic Approach.** The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) **Continuous Emissions Monitoring System (CEMS).**
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) **Mass Balance Calculations.**
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

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## SECTION 4. APPENDIX B

### Common Conditions

- 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
  - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using sitespecific data that another content within the range is more accurate.
  - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
    - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
    - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
    - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
  - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

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**SECTION 4. APPENDIX B**

**Common Conditions**

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[Rule 62-210.370(2), F.A.C.]

*c. Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
  - a. All Title V sources.
  - b. All synthetic non-Title V sources.
  - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
  - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

## Livingston, Sylvia

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**From:** Livingston, Sylvia  
**Sent:** Thursday, October 22, 2009 8:01 AM  
**To:** 'diandv@bellsouth.net'  
**Cc:** DeVore, Susan; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** FW: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC Final  
**Attachments:** 1210465-017-AC\_Signatures.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Final Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: **We must receive verification that you are able to access the documents.** Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.017.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.017.AC.F_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

**Project Number:** 1210465-017-AC

**Permit Status:** FINAL

**Permit Activity:** CONSTRUCTION/ Temporary Short-Term Trail of Auto Fluff

**Facility County:** SUWANNEE

**Processor:** Jeff Koerner

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Project documents that are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

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)

Note: The attached 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>>.

## Livingston, Sylvia

---

**From:** Messer Tom [tomm@suwanneecement.com]  
**To:** Livingston, Sylvia  
**Sent:** Tuesday, October 20, 2009 2:03 PM  
**Subject:** Read: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC  
Final

Your message

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

was read on 10/20/2009 2:03 PM.

## Livingston, Sylvania

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**From:** Cole Krishna [krishnac@suwanneecement.com]  
**Sent:** Tuesday, October 20, 2009 3:09 PM  
**To:** Livingston, Sylvania  
**Subject:** RE: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC Final

Sylvania,

SAC has received this notice and was able to access all documents attached.

Thank you,

Krishna C. Cole  
Environmental Engineer  
Suwannee American Cement, LLC  
5117 US HWY 27  
Branford, FL 32008  
386-935-5023 office  
386-965-3866 cell  
386-935-5080 fax  
[krishnac@suwanneecement.com](mailto:krishnac@suwanneecement.com)

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**From:** Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Tuesday, October 20, 2009 2:02 PM  
**To:** Messer Tom  
**Cc:** Horton Joe; Cole Krishna; Martini Celso; mlee@kooglerassociates.com; Strong, Greg; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; Gibson, Victoria; commissioners@suwcounty.org; Kaseys@suwcounty.org; boccc@alachuacounty.us; chris@alachuacounty.us; Greenhalgh, Tom; long5892@bellsouth.net; RobBrinkman@cox.net; lmcsh2001@aol.com; Svenn@ichetucknee.org; bruderly@aol.com; kacmd@aol.com; dmot51@aol.com; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC Final

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**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.  
**Facility Name:** SUWANNEE AMERICAN CEMENT  
**Project Number:** 1210465-017-AC

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Bureau of Air Regulation  
Division of Air Resource Management (DARM)  
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[sylvia.livingston@dep.state.fl.us](mailto:sylvia.livingston@dep.state.fl.us)

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*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.*



## Livingston, Sylvia

---

**From:** The Longs [long5892@bellsouth.net]  
**Sent:** Tuesday, October 20, 2009 7:32 PM  
**To:** Livingston, Sylvia  
**Subject:** Re: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC Final

Hello,

I received your e-mail and was able to download the final permit documents.

Does your department have any idea when SAC, LLC will actually begin the trial period?

Thank you for your time.

Annette Long  
Save Our Suwannee, Inc.  
(352) 490-8930  
P.O. Box 2656  
Chiefland, FL 32644

---

**From:** "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>  
**To:** tomm@suwanneecement.com  
**Cc:** jbhorton@suwanneecement.com; krishnac@suwanneecement.com; celsom@vcsmc.com; mlee@kooglerassociates.com; "Strong, Greg" <Greg.Strong@dep.state.fl.us>; "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>; commissioners@suwcounty.org; Kaseys@suwcounty.org; bocc@alachuacounty.us; chris@alachuacounty.us; "Greenhalgh, Tom" <Tom.Greenhalgh@dep.state.fl.us>; long5892@bellsouth.net; RobBrinkman@cox.net; lmcsh2001@aol.com; Svenn@ichetucknee.org; bruderly@aol.com; kacmd@aol.com; dmot51@aol.com; "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>; "Walker, Elizabeth (AIR)" <Elizabeth.Walker@dep.state.fl.us>  
**Sent:** Tuesday, October 20, 2009 2:01:52 PM  
**Subject:** SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC Final

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*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.*

## Livingston, Sylvia

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**From:** Rob Brinkman [robbrinkman@cox.net]  
**Sent:** Wednesday, October 21, 2009 11:37 AM  
**To:** Livingston, Sylvia  
**Subject:** RE: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC Final

Ms. Livingston,

This e-mail is to confirm that I have received and can access the documents referenced below.

Sincerely,

Rob Brinkman, Chair  
SSJ group of the Sierra Club Florida

On Tue, Oct 20, 2009 at 2:01 PM, Livingston, Sylvia wrote:


> Dear Sir/ Madam:  
>  
> Attached is the official Notice of Final Permit for the project  
> referenced below. Click on the link displayed below to access the  
> permit project documents and send a "reply" message verifying receipt  
> of the  
> document(s)  
> provided in the link; 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".  
> Note: We must receive verification that you are able to access the  
> documents.  
> Your immediate reply will preclude subsequent e-mail transmissions to  
> verify accessibility of the document(s).  
>  
> Click on the following link to access the documents:  
>  
>  
> [http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.017.AC.F\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.017.AC.F_pdf.zip)  
>  
> Owner/Company Name: SUWANNEE AMERICAN CEMENT CO. Facility Name:  
> SUWANNEE AMERICAN CEMENT Project Number: 1210465-017-AC Permit Status:  
> FINAL Permit Activity: CONSTRUCTION/ Temporary Short-Term Trail of  
> Auto Fluff Facility County: SUWANNEE  
> Processor: Jeff Koerner  
>  
> 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. Access these documents by  
> clicking on the link provided above, or search for other project  
> documents using the "Air Permit Documents Search" website at  
> <http://www.dep.state.fl.us/air/eproducts/apds/default.asp> .  
> Project documents that are addressed in this email may require  
> immediate action within a specified time frame. Please open and review

> the  
> document(s)  
> as soon as possible, and verify that they are accessible. Please  
> advise this office of any changes to your e-mail address or that of  
> the Engineer-of-Record. If you have any problems opening the documents  
> or would like further information, please contact the Florida  
> Department of Environmental Protection, Bureau of Air Regulation at  
> (850)488-0114.  
>  
>  
> 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)  
>  
>  
> Note: The attached document is in Adobe Portable Document Format  
> (pdf). Adobe Acrobat Reader can be downloaded for free at the  
> following internet  
> site:

Florida Department of  
Environmental Protection

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**Memorandum**

To: Trina Vielhauer, Bureau of Air Regulation  
Through: Jeff Koerner, New Source Review Section   
Date: September 15, 2009  
Subject: Draft Minor Source Air Construction Permit  
Project No. 1210465-017-AC  
Suwannee American Cement, LLC, Branford Cement Plant  
Temporary Short-Term Trial of Auto Fluff

Attached for your review is a draft minor air construction permit package, which authorizes a temporary trial to co-fire auto fluff with coal in the existing Kiln 1 system. This authorization is only for a temporary short-term trial (20 days) to determine whether this practice is feasible and practical for further consideration as an alternative fuel for the cement kiln. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is not considered a new source review reform project. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk

**P.E. CERTIFICATION STATEMENT**

**PERMITTEE**

Suwannee American Cement, LLC  
5117 U.S. Highway 27  
Branford, Florida 32008

Draft Permit No. 1210465-017-AC  
Branford Cement Plant  
Temporary Short-Term Trial of Auto Fluff  
Suwannee County, Florida

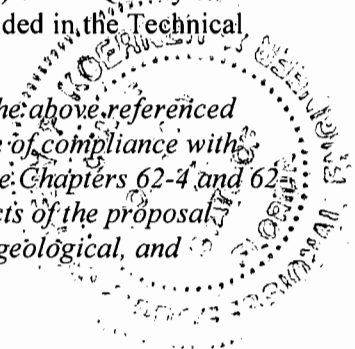
**PROJECT DESCRIPTION**

The applicant requests authorization to conduct a temporary short-term trial to co-fire up to 1200 tons of "auto fluff" in the existing Kiln 1 system over approximately a 20-day trial period. Auto fluff is a byproduct of the metal recycling process consisting of a shredded mixture of non-ferrous materials including plastics, foam, rubber and glass that comes from scrap automobiles. The mixture of materials contains a significant heating value that can be used to displace the firing of some coal in the cement kiln. The purpose of the project is to determine whether this material is feasible and practical for further consideration as an alternative fuel for the cement kiln. Auto fluff may contain mercury if the mercury-containing switches are not removed from the automobile before shredding.

As a worst-case scenario, the project will potentially emit an additional 2.4 pounds mercury and 3.7 pounds lead based on: the maximum expected metal concentrations of auto fluff; 1200 tons of auto fluff; the assumption that all of the highly volatile mercury is emitted; and the assumption that more than 99.99% of the low-volatile lead is bound to the cement clinker produced by the kiln. The project must continue to comply with all current emissions standards including mercury. Emissions increases of other pollutants are expected to be negligible. The existing kiln has high operating temperatures with a long residence time and is designed to fire a variety of alternative fuels while minimizing emissions of carbon monoxide and volatile organic compounds. Acid gases will be naturally scrubbed by lime in the cement kiln. Non-volatile metals will be bound to the cement clinker produced by the kiln. A selective non-catalytic reduction system is used to control emissions of nitrogen oxides. A fabric filter system is used to control emissions of particulate matter.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality. The Department's full review of the project and rationale for issuing the draft permit is provided in the Technical Evaluation and Preliminary Determination.

*I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify any other aspects of the proposal (including, but not limited to, the electrical, civil, mechanical, structural, hydrological, geological, and meteorological features).*



*Jeffery F. Koerner*

*9-17-09*

Jeffery F. Koerner, P.E.  
Registration Number 49441

(Date)



# 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

September 18, 2009

Mr. Tom Messer, Plant Manager  
Branford Cement Plant  
Suwannee American Cement, LLC  
5117 U.S. Highway 27  
Branford, Florida 32008

Re: Project No. 1210465-017-AC  
Suwannee American Cement, LLC, Branford Cement Plant  
Temporary Short-Term Trial of Auto Fluff

Dear Mr. Messer:

On September 11, 2009, you submitted an application requesting a temporary short-term trial to co-fire up to 1200 tons of "auto fluff" in the existing Kiln 1 system over approximately a 20-day trial period. The existing facility is located in Suwannee County at 5117 US Highway 27 in Branford, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Jeff Koerner, at 850/921-9536.

Sincerely,

A handwritten signature in black ink that reads "Trina Vielhauer". The signature is written in a cursive, flowing style.

Trina Vielhauer, Chief  
Bureau of Air Regulation

Enclosures

TLV/jfk

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**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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*In the Matter of an  
Application for Air Permit by:*

Suwannee American Cement, LLC  
5117 U.S. Highway 27  
Branford, Florida 32008

Project No. 1210465-017-AC  
Minor Air Construction Permit

Authorized Representative:  
Mr. Tom Messer, Plant Manager

Branford Cement Plant  
Temporary Short-Term Trial of Auto Fluff  
Suwannee County, Florida

**Facility Location:** Suwannee American Cement, LLC operates an existing Portland cement plant, which is located in Suwannee County at 5117 US Highway 27 in Branford, Florida.

**Project:** The applicant requests a temporary short-term trial to co-fire up to 1200 tons of “auto fluff” in the existing Kiln 1 system over approximately a 20-day trial period. The purpose of the project is to determine whether this material is feasible and practical for further consideration as an alternative fuel for the cement kiln. Details of the trial burn and potential emissions from the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority’s physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority’s mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority’s telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority’s project review engineer for additional information at the address or phone number listed above.

**Notice of Intent to Issue Permit:** The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Public Notice:** Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-



## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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110.106(11), F.A.C.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

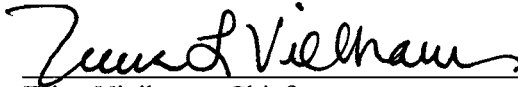
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT**

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Executed in Tallahassee, Florida.



Trina Vielhauer, Chief  
Bureau of Air Regulation

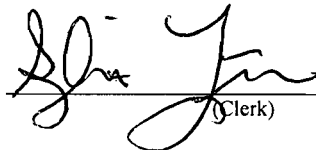
**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on 9/18/09 to the persons listed below.

cc: Mr. Tom Messer, SAC (tomm@suwanneecement.com)  
Mr. Joe Horton, SAC (jbhorton@suwanneecement.com)  
Mr. Celso Martini, VCSMC (celsom@vcsmc.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. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)  
Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

  
\_\_\_\_\_  
(Clerk)

9/18/09  
(Date)

## WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

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In addition, courtesy copies were also provided to the following persons by as indicated below.

### Electronic Mail

Chair, Suwannee County Board of County Commissioners (commissioners@suwcounty.org)  
Chair, Alachua County Board of County Commissioners (bocc@alachuacounty.us)  
Mr. Chris Bird, Director of Alachua County Department of Environmental Regulation (chris@alachuacounty.us)  
Mr. Tom Greenhalgh, Florida Geological Survey (tom.greenhalgh@dep.state.fl.us)  
Mr. Mark Latch, DEP (mark.latch@dep.state.fl.us)  
Ms. Annette Long, Save Our Suwannee (long5892@bellsouth.net)  
Mr. Rob Brinkman, Sierra Club (RobBrinkman@cox.net)  
Ms. December McSherry (lmcsh2001@aol.com)  
Mr. Svenn Lindskold (Svenn@ichetucknee.org)  
Mr. Dave Bruderly (bruderly@aol.com)  
Ms. Patrice Boyes, Esquire (pat@hydrogeology.com)  
Ms. Kathy Cantwell (kacmd@aol.com)  
Mr. Chuck Yagel (cyagel@bellsouth.net)  
Mr. John Parrino (parrino6@aol.com)  
Ms. Virginia Seacrist (sisotter@gator.net)  
Ms. Linda Pollini (arttek@gate.net)  
Mr. Bob Milner and Ms. Lynn Milner (medjob@jobs4u.com)

### U.S. Mail

Mr. J. Calvin Gaddy  
Mr. Ralph Ashodian  
Ms. Helen Beaty  
Ms. Bessie Robinson

## PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection  
Division of Air Resource Management, Bureau of Air Regulation  
Draft Air Construction Permit  
Project No. 1210465-017-AC  
Suwannee American Cement, LLC, Branford Cement Plant  
Suwannee County, Florida

**Applicant:** The applicant for this project is Suwannee American Cement, LLC. The applicant's authorized representative and mailing address are: Mr. Tom Messer, Plant Manager, Suwannee American Cement, LLC, Branford Cement Plant, 5117 U.S. Highway 27, and Branford, Florida 32008.

**Facility Location:** Suwannee American Cement, LLC operates an existing Portland cement plant, which is located in Suwannee County at 5117 US Highway 27 in Branford, Florida.

**Project:** The applicant requests authorization to conduct a temporary short-term trial to co-fire up to 1200 tons of "auto fluff" in the existing Kiln 1 system over approximately a 20-day trial period. Auto fluff is a byproduct of the metal recycling process consisting of a shredded mixture of non-ferrous materials including plastics, foam, rubber and glass that comes from scrap automobiles. The mixture of materials contains a significant heating value that can be used to displace the firing of some coal in the cement kiln. The purpose of the project is to determine whether this material is feasible and practical for further consideration as an alternative fuel for the cement kiln. Auto fluff may contain mercury if the mercury-containing switches are not removed from the automobile before shredding.

As a worst-case scenario, the project will potentially emit an additional 2.4 pounds mercury and 3.7 pounds lead based on: the maximum expected metal concentrations of auto fluff; 1200 tons of auto fluff; the assumption that all of the volatile mercury is emitted; and the assumption that more than 99.99% of the low-volatile lead is bound to the cement clinker produced by the kiln. The project must continue to comply with all current emissions standards including mercury. Emissions increases of other pollutants are expected to be negligible. The existing kiln has high operating temperatures with a long residence time and is designed to fire a variety of alternative fuels while minimizing emissions of carbon monoxide and volatile organic compounds. Acid gases will be naturally scrubbed by lime in the cement kiln. Non-volatile metals will be bound to the cement clinker produced by the kiln. A selective non-catalytic reduction system is used to control emissions of nitrogen oxides. A fabric filter system is used to control emissions of particulate matter.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number:

(Public Notice to be Published in the Newspaper)

<http://www.dep.state.fl.us/air/emission/apds/default.asp>.

**Notice of Intent to Issue Air Permit:** The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.

**(Public Notice to be Published in the Newspaper)**



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Suwannee American Cement  
5117 U.S. Highway 27  
Branford, Florida 32008

Branford Cement Plant  
Facility ID No. 1210465

**PROJECT**

Project No. 1210465-017-AC  
Application for Minor Source Air Construction Permit  
Temporary Operational Trial to Fire Auto Fluff

**COUNTY**

Suwannee County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Division of Air Resource Management  
Bureau of Air Regulation  
New Source Review Section  
2600 Blair Stone Road, MS#5505  
Tallahassee, Florida 32399-2400

September 15, 2009

## **1. GENERAL PROJECT INFORMATION**

### **Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

### **Glossary of Common Terms**

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

### **Facility Description and Location**

Suwannee American Cement operates an existing Portland cement manufacturing plant, which is categorized under Standard Industrial Classification Code No. 3241. The existing Branford Cement Plant is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida. The UTM coordinates of the existing facility are Zone 17, 321.4 km East, and 3315.9 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

### **Facility Regulatory Categories**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

### **Project Description**

The applicant, Suwannee American Cement, operates an existing Portland cement manufacturing plant, which fires coal as the primary fuel for the cement kiln. The applicant is exploring “auto fluff” as an alternative fuel to be co-fired with coal. Auto fluff is a byproduct of the metal recycling process consisting of a shredded mixture of non-ferrous materials including plastics, foam, rubber and glass that comes from scrap automobiles. The mixture of materials contains a significant heating value that can be used to supplement coal-firing in the cement kiln. However, auto fluff may contain mercury without a rigorous program to remove mercury-containing materials such as switches.

Suwannee American Cement has been working with Gerdau Ameristeel, a steel mini-mill in Jacksonville that accepts salvaged automobiles for use as scrap metal to produce steel. Gerdau Ameristeel has been working with suppliers to remove mercury switches in an effort to reduce the mercury concentration of the auto fluff, which is

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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now approximately 1 ppm by weight. The following goals can be achieved if auto fluff can be successfully co-fired in the cement kiln:

- Auto fluff will not be disposed of in a landfill, which extends the life of existing landfills.
- Energy from the auto fluff can be recovered for use in the cement kiln, which reduces the amount of coal that must be fired.
- Gerdau Ameristeel (and other suppliers) will be able to develop a marketable fuel and save current cost of waste disposal.
- Suwannee American Cement will be able to reduce operational costs by displacing coal with auto fluff.
- Suwannee American Cement and Gerdau Ameristeel will be able to meet their corporate commitments to sustainability by recycling materials, recovering materials and energy as well as minimizing wastes.

In currently pending Project 1210465-016-AC, Suwannee American Cement is considering a long-term trial (approximately six months) to co-fire auto fluff with coal to determine:

- Overall feasibility of auto fluff as an alternative fuel for the cement kiln;
- Sampling and analysis procedures;
- Appropriate quality assurance (QA)/quality control (QC) procedures to ensure that the quality of auto fluff can be improved (substantially reduce the mercury content, lower the moisture content and increase the heating value);
- Actual mercury emissions;
- Feasibility of mercury control techniques including shuttling a portion of the baghouse dust directly to the cement product and diverting a portion of the raw meal directly to the cement product; and
- Impacts on cement quality.

Suwannee American Cement proposes to introduce shredded auto fluff through the same system used for fly ash injection and is actively developing the information needed to support their request for a long-term trial. However, it is unknown whether this system is adequate for handling and firing shredded auto fluff. On September 11, 2009, Suwannee American Cement submitted a new application (this project) requesting a temporary short-term permit to co-fire auto fluff with coal. The purpose of the trial is to determine the feasibility and practicality of receiving, storing, handling and firing auto fluff at the existing cement plant. Depending on the outcome of the short-term operational trial, Suwannee American Cement will decide whether to continue pursuit the long-term trial.

As provided in the application, Suwannee American Cement proposes the following for the short-term, temporary operational test of shredded auto fluff:

1. Auto fluff would be co-fired with coal in the cement kiln at a maximum rate of 30% of the maximum coal-firing rate based on heat input, which is approximately 10 tons of auto fluff per hour. The trial will test at least three different firing rates (e.g. 10 tons/hour, 7.5 tons/hour and 5.0 tons/hour). No more than 1200 tons of auto fluff would be fired over a period of 20 successive calendar days. As a worst-case scenario, the project will potentially emit an additional 2.4 pounds of mercury based on an expected maximum mercury content of auto fluff (1 ppm by weight) and 1200 tons of material.
2. Auto fluff will be initially processed to size by a shredder at the Gerdau Ameristeel facility (supplier). Only automobiles will be shredded for the trial – no white goods (residential or industrial appliances).
3. It is estimated that Gerdau Ameristeel will deliver approximately three shipments (400 tons per shipment) to the Branford Cement Plant. Representative samples of each auto fluff shipment will be taken by Gerdau Ameristeel and analyzed for the heating value, volatiles, ash content, sulfur content, chlorine content,



## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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moisture content, particle size, metals (including mercury and thallium) and concentration of polychlorinated biphenyls (PCB). Analytical results of the initial shipment will be provided prior to delivery to the Branford Cement Plant. Suwannee American Cement will notify the Department in advance of commencing the trial and provide the initial analytical results. The analytical results for subsequent shipments shall be provided as soon as they are available.

4. Auto fluff will be delivered in a covered truck unloaded to a paved and covered area for storage (gypsum storage building), which can control fugitive dust emissions with a water spray system. However, the auto fluff is typically 10% moisture by weight and not expected to be a source of fugitive emissions.
5. Auto fluff will be transferred by a front loader to a live-bottom hopper to feed the temporary Schenk feeder system, which will measure and dose auto fluff pneumatically through the existing fly ash injection feed lines. The system will be integrated with the coal fuel feeding controls currently in use and operated from the control room. The existing Data Retrieval System will monitor and record the Schenk feed data.
6. Gerdau Ameristeel will try to size the auto fluff to no more than 1" to prevent plugging in the kiln injection system. It is possible that some pieces may exceed this level and cause feeder problems or perhaps a smaller size will be necessary during the trial. Therefore, Suwannee American Cement requests authority to operate a temporary shredding and screening system to "re-shred" the material as necessary. The equipment has a maximum capacity of 15 tons per hour and is equipped with a spray bar to control fugitive dust emissions as necessary. The shredder has a diesel engine rated at approximately 610 horsepower (hp) and the screener has a diesel engine rated at approximately 100 hp. This equipment would be operated just outside of the gypsum storage building.
7. Each day that auto fluff is fired in the kiln, Suwannee American Cement shall take representative samples of the as-fired auto fluff and have these analyzed for the same parameters and contaminants as the supplier.
8. For the trial, Suwannee American Cement will monitor NO<sub>x</sub>, SO<sub>2</sub> and total hydrocarbon (THC) emissions with the existing certified CEMS, opacity with the existing certified COMS and CO emissions with the existing process monitor. Mercury emissions will be calculated based on the analytical results and a material balance as currently required by permit.
9. For the trial, Suwannee American Cement will monitor: the average fuel feed rates, the average kiln feed rates, the average clinker production rates, the total fuel consumption rates, the number of times a trial was stopped and the reason for stopping a trial.
10. Within 90 days of completing the temporary trial, Suwannee American Cement will provide a report summarizing the analytical results, emissions monitoring data, kiln production/process data and a conclusion as to the feasibility and practicality of firing auto fluff as an alternative fuel. The report shall specifically identify any problems that occurred during the trial and the cause of the problem.

## 2. PSD APPLICABILITY

### General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 5 tons per year or more of lead;

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the “significant emission rates” defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO<sub>x</sub>); sulfur dioxide (SO<sub>2</sub>); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM<sub>10</sub>); volatile organic compounds (VOC); lead (Pb); fluorides (F); sulfuric acid mist (SAM); hydrogen sulfide (H<sub>2</sub>S); total reduced sulfur (TRS), including H<sub>2</sub>S; reduced sulfur compounds, including H<sub>2</sub>S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO<sub>2</sub> and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 µg/m<sup>3</sup>, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered “significant” for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several “significant” regulated pollutants.

### PSD Applicability for Project

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Summary of the Applicant’s PSD Applicability Analysis

Pollutant	Emissions for Temporary Trial			Significant Emissions Rate	Subject to PSD?
	Shredder/ Screener	Kiln (above coal)	Increase		
CO	0.33 tons	Negligible	0.33 tons	100 tons/year	No
NO <sub>x</sub>	0.28 tons	Negligible	0.28 tons	40 tons/year	No
PM	0.01 tons	Negligible	0.01 tons	25 tons/year	No
PM <sub>10</sub>	0.007 tons	Negligible	0.007 tons	15 tons/year	No
SO <sub>2</sub>	0.09 tons	Negligible	0.09 tons	40 tons/year	No
VOC	0.28 tons	Negligible	0.28 tons	40 tons/year	No
Hg	---	2.4 lb	2.4 lb	200 lb/year	No
Pb	---	3.7 lb	3.7 lb	1200 lb/year	No

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## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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Other than mercury and lead, the applicant believes that co-firing auto fluff with coal will result in negligible changes in PSD pollutant emissions for the following reasons.

- CO and VOC emissions will be monitored with existing CEMS and controlled by the high temperatures and long residence time in the kiln, which was specifically designed with a separate calciner chamber for firing alternative fuels.
- NO<sub>x</sub> emissions will be monitored with existing CEMS and controlled with the existing SNCR system as necessary.
- Particulate matter will be controlled with the existing baghouse.
- SO<sub>2</sub> emissions will be negligible because of the low sulfur content of auto fluff and natural scrubbing with lime in the cement kiln.
- Although the lead content of auto fluff may be high, more than 99.99% will be captured and bound in the cement clinker based on previous tests for this industry.

As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

### 3. DEPARTMENT REVIEW

#### Emissions

Auto fluff is a heterogeneous mixture of materials containing several contaminants such as chlorine, lead, mercury, thallium and PCB. The heating value is sufficient for consideration as an alternative fuel for the cement kiln when co-fired with a primary fuel. The combustion of auto fluff will potentially result in emissions of CO, NO<sub>x</sub>, PM, PM<sub>10</sub>, SO<sub>2</sub>, VOC, HCl, lead, mercury, thallium and PCB. Much of the criteria pollutant emissions will be offset by the coal that will be displaced by the alternative fuel. CO, PCB and VOC emissions will be very low because of the high kiln temperature and long residence time. NO<sub>x</sub> emissions will be controlled with the existing SNCR system as necessary. The existing baghouse will control emissions of particulate matter. Any SO<sub>2</sub> and HCl will be naturally scrubbed by the lime in the cement kiln. Lead is bound to the cement clinker produced by the kiln. However, volatile metals such as mercury and thallium will re-circulate throughout the kiln system and gradually build up in the raw mill silo and collected baghouse dust. Once equilibrium is reached or the raw mill is shut down, the volatile metals can escape past the baghouse.

#### Conclusion

The requested trial will burn a very small amount of auto fluff to determine if it is feasible and practical enough to continue to pursue as an alternate fuel. The existing kiln system and controls are sufficient to ensure that emissions from the alternative fuel will be very low. The applicant will be required to comply with all existing valid permit conditions. The draft permit will include the following requirements.

1. Temporary Equipment: The permittee is authorized to temporarily install and operate the following equipment for the trial: a Schenk feeder system to measure and dose auto fluff pneumatically through the existing fly ash injection feed lines; a diesel-powered shredder (approximately 610 hp); a diesel-powered screener (approximately 100 hp); a hopper; a conveyor; ductwork; and other miscellaneous equipment to unload, store and handle the auto fluff. Only diesel fuel shall be fired. [Application No. 1210465-017-AC]
2. Temporary Alternative Fuel: During the temporary trial period, the permittee is authorized to co-fire auto fluff with coal subject to the following:
  - a. For the trial period, permittee is authorized to accept auto fluff from Gerdau Ameristeel (supplier) that is processed only from automobiles. The permittee shall not accept any auto fluff processed from white goods (residential or industrial appliances).
  - b. For the trial period, permittee is authorized to accept auto fluff already sized to approximately 1" or less

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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from shredding by the supplier.

- c. Auto fluff shall be delivered in covered trucks and unloaded to a paved and covered area for storage. Auto fluff is typically 10% moisture by weight and is not expected to be a source of fugitive dust emissions. However, the plant shall apply water as necessary to prevent fugitive dust problems.
- d. Prior to the first delivery of auto fluff to the Branford Cement Plant, the permittee shall obtain a copy of a written approval or exemption from the requirements of the Toxic Substance and Control Act to handle and transport the permitted amount of auto fluff to the cement plant for burning.
- e. For each shipment of auto fluff, the permittee shall obtain from the supplier the analytical results for a representative sample taken from the shipment for: the heating value, moisture content, volatiles, ash content, sulfur content, chlorine content, fluorine content, particle size, metals (beryllium, cadmium, chromium, lead, mercury and thallium) and PCB. Prior to the initial delivery of auto fluff, the permittee shall obtain a copy of the analytical results. For subsequent deliveries, the permittee shall obtain the analytical results as soon as they are available from the supplier.
- f. At least one day prior to the initial delivery, the permittee shall provide written notification to the Compliance Authority of: the expected date of delivery, the approximate amount of auto fluff to be delivered, the corresponding analytical results and a preliminary schedule for conducting the trial burn. For subsequent deliveries and within two days of each delivery, the permittee shall provide written notification to the Compliance Authority of the date of delivery and the amount of auto fluff delivered. The permittee shall provide copies of the analytical results as soon as they are available from the supplier. Notifications may be made by letter, facsimile or e-mail.
- g. Once auto fluff is first fired, the permittee shall complete the trial burn within 20 successive calendar days. If unforeseen problems delay the trial burn, the plant may continue the trial for an additional 10 successive calendar days after receiving written approval by the Bureau of Air Regulation.

[Application No. 1210465-017-AC and Rule 62-210.200(PTE), F.A.C.]

3. **Restricted Operation:** During the trial period, auto fluff shall be co-fired with coal in the existing cement kiln at a maximum rate of approximately 137 MMBtu per hour, which is roughly 30% of the maximum heat input rate when firing only coal. Based on previous heating values for auto fluff, this is approximately 10 tons of auto fluff per hour. The purpose of the trial is to determine the impacts for a range of firing rates (e.g. 10 tons/hour, 7.5 tons/hour and 5.0 tons/hour). During the trial period, no more than 1200 tons of auto fluff shall be burned. [Application No. 1210465-017-AC and Rule 62-210.200(PTE), F.A.C.]
4. **Re-Shredding:** If problems with feeding the auto fluff occur, the permittee may re-shred and screen the auto fluff to obtain a more desirable size. The shredder/screener system shall be equipped with a water spray system to control fugitive dust emissions if necessary. Once it is determined that re-shredding on site is necessary, the permittee shall contact the supplier and require the supplier to re-shred subsequent shipments prior to delivery to the Branford Cement Plant. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
5. **Existing Permits:** This permit supplements all existing valid permits. The permittee shall continue to comply with all applicable conditions from valid air construction and operation permits. [Rule 62-4.070(3), F.A.C.]
6. **Sampling:** During the trial period and at least once every four hours that auto fluff is fired, the permittee shall take a grab sample of as-fired auto fluff from the fuel feed belt in a one gallon container (approximate). [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
7. **Analyses:** The permittee shall combine all samples of as-fired auto fluff collected during a calendar day and take a representative composite sample. The composite sample shall be analyzed for: the heating value, moisture content, volatiles, ash content, sulfur content, chlorine content, fluorine content, particle size, metals (beryllium, cadmium, chromium, lead, mercury and thallium) and PCB. The permittee shall use the same analytical methods used by the auto fluff supplier so that a direct comparison can be made. [Application No.

## TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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1210465-017-AC and Rule 62-4.070(3), F.A.C.]

8. **Emissions Monitoring:** For the trial period, the plant shall continue to monitor nitrogen oxides, sulfur dioxide and total hydrocarbon emissions with the existing certified continuous emissions monitoring systems, opacity with the existing certified continuous opacity monitoring system and CO emissions with the existing process monitors. For the trial period, mercury emissions shall be calculated based on the analytical results of the auto fluff and the material balance technique currently required by permit. For the full trial, an increase in mercury emissions shall not exceed 2.4 pounds (calculated as the difference between the actual co-firing of auto fluff with coal during the trial and the firing of an equivalent amount of coal for the same heat input rate). [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
9. **Process Monitoring:** For the trial, the plant will monitor: the average fuel feed rates, the average kiln feed rates, the average clinker production rates, the total fuel consumption rates, the temperature at the inlet to the baghouse, the number of times a trial was stopped and the reason for stopping a trial. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
10. **Trial Burn Summary Report:** Within 90 days of completing the temporary trial, the permittee shall submit a report to the Bureau of Air Regulation and Compliance authority summarizing: the analytical results including a comparison between samples taken by the supplier and the permittee; problems with unloading storing or handling the auto fluff; problems with the material size and any re-shredding conducted on site; the emissions monitoring data; kiln production/process data; inlet temperatures to the baghouse; and a conclusion as to the feasibility and practicality of firing auto fluff as an alternative fuel. The report shall specifically identify any problems that occurred during the trial and the expected cause of the problem. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]

#### 4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Jeff Koerner is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

# **DRAFT PERMIT**

## **PERMITTEE**

Suwannee American Cement, LLC  
5117 U.S. Highway 27  
Branford, Florida 32008

Air Permit No. 1210465-017-AC  
Permit Expires: October 15, 2010  
Minor Air Construction Permit

Authorized Representative:  
Mr. Tom Messer, Plant Manager

Branford Cement Plant  
Temporary Short-Term Trial of Auto Fluff

## **PROJECT**

Suwannee American Cement, LLC operates an existing Portland cement plant, which is categorized under Standard Industrial Classification No. 3241. The existing facility is located in Suwannee County at 5117 US Highway 27 in Branford, Florida. The UTM coordinates are: Zone 17, 321.4 km East and 3315.9 km North.

This is the final air construction permit, which authorizes a temporary short-term trial to co-fire auto fluff in the existing Kiln 1 system. This authorization is only for a temporary short-term trial to determine whether this practice is feasible and practical for further consideration as an alternative fuel for the cement kiln.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); Section 4 (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit. As noted in the Final Determination provided with this final permit, only minor changes and clarifications were made to the draft permit.

## **STATEMENT OF BASIS**

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida

**(DRAFT)**

\_\_\_\_\_  
Joseph Kahn, Director  
Division of Air Resource Management

\_\_\_\_\_  
(Date)

**CERTIFICATE OF SERVICE**

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit with Appendices) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on \_\_\_\_\_ **(DRAFT)** \_\_\_\_\_ to the persons listed below.

- cc: Mr. Tom Messer, Suwannee American Cement, LLC (tomm@suwanneecement.com)
- Mr. Joe Horton, Suwannee American Cement, LLC (jbhorton@suwanneecement.com)
- Mr. Krishna Cole, Suwannee American Cement, LLC (krishnac@suwanneecement.com)
- Mr. Celso Martini, VCSMC (celsom@vcsmc.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. Ana M. Oquendo, EPA Region 4 (oquendo.ana@epa.gov)
- Ms. Vickie Gibson, DEP BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

**(DRAFT)**

\_\_\_\_\_  
(Clerk)

\_\_\_\_\_  
(Date)

**DRAFT PERMIT**

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In addition, courtesy copies were also provided to the following persons by as indicated below.

Electronic Mail

Chair, Suwannee County Board of County Commissioners (commissioners@suwcounty.org)  
Chair, Alachua County Board of County Commissioners (bocc@alachuacounty.us)  
Mr. Chris Bird, Director of Alachua County Department of Environmental Regulation (chris@alachuacounty.us)  
Mr. Tom Greenhalgh, Florida Geological Survey (tom.greenhalgh@dep.state.fl.us)  
Mr. Mark Latch, DEP (mark.latch@dep.state.fl.us)  
Ms. Annette Long, Save Our Suwannee (long5892@bellsouth.net)  
Mr. Rob Brinkman, Sierra Club (RobBrinkman@cox.net)  
Ms. December McSherry (lmcsh2001@aol.com)  
Mr. Svenn Lindskold (Svenn@ichetucknee.org)  
Mr. Dave Bruderly (bruderly@aol.com)  
Ms. Patrice Boyes, Esquire (pat@hydrogeology.com)  
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Mr. John Parrino (parrino6@aol.com)  
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Ms. Linda Pollini (arttek@gate.net)  
Mr. Bob Milner and Ms. Lynn Milner (medjob@jobs4u.com)

U.S. Mail

Mr. J. Calvin Gaddy  
Mr. Ralph Ashodian  
Ms. Helen Beaty  
Ms. Bessie Robinson



**SECTION 1. GENERAL INFORMATION (DRAFT)**

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**FACILITY DESCRIPTION**

The existing facility consists of a Portland cement manufacturing plant, the associated quarry, and raw material and cement handling operations. The plant combines raw materials and utilizes a preheater/calcliner kiln system with inline mill to produce cement clinker. The clinker is milled and combined with gypsum to produce Portland cement. The existing plant has a capacity of 210 tons per hour of dry preheater feed materials, 120 tons per hour of clinker production, and 150 tons per hour of Portland cement production. Annual production is limited to the following 12-month rolling totals: 1,648,578 tons per year of dry preheater feed materials; 965,425 tons per year of clinker production; and 1,191,360 tons per year of Portland cement production.

**PROPOSED PROJECT**

This permit authorizes a temporary trial period to co-fire auto fluff with coal to determine whether this is feasible and practical for further consideration as an alternative fuel for the cement kiln. This project will affect the following existing permitted emissions unit.

Facility ID No. 1210465	
<b>ID No.</b>	<b>Emission Unit Description</b>
004	Kiln No. 1 pyroprocessing system

**FACILITY REGULATORY CLASSIFICATION**

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

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1. Permitting Authority: All documents related to PSD applications for permits to construct or modify emissions units shall be submitted to the Bureau of Air Regulation of the Florida Department of Environmental Protection (DEP) at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. All documents related to applications for permits to construct minor sources of air pollution or to operate the facility shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Air Resources Section of the Department's Northeast District Office at 7825 Baymeadows Way, Suite 200-B, Jacksonville, FL 32256-7590.
3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); and Appendix C (Common Conditions).
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

**SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)**

**A. Kiln 1 System**

This section of the permit addresses the following emissions unit.

ID	Emission Unit Description
004	Kiln No. 1 pyroprocessing system

**EQUIPMENT**

1. Temporary Equipment: The permittee is authorized to temporarily install and operate the following equipment for the trial: a Schenk feeder system to measure and dose auto fluff pneumatically through the existing fly ash injection feed lines; a diesel-powered shredder (approximately 610 hp); a diesel-powered screener (approximately 100 hp); a hopper; a conveyor; ductwork; and other miscellaneous equipment to unload, store and handle the auto fluff. Only diesel fuel shall be fired. [Application No. 1210465-017-AC]

**PERFORMANCE RESTRICTIONS**

2. Temporary Alternative Fuel: During the temporary trial period, the permittee is authorized to co-fire auto fluff with coal subject to the following:
  - a. For the trial period, permittee is authorized to accept auto fluff from Gerdau Ameristeel (supplier) that is processed only from automobiles. The permittee shall not accept any auto fluff processed from white goods (residential or industrial appliances).
  - b. For the trial period, permittee is authorized to accept auto fluff already sized to approximately 1" or less from shredding by the supplier.
  - c. Auto fluff shall be delivered in covered trucks and unloaded to a paved and covered area for storage. Auto fluff is typically 10% moisture by weight and is not expected to be a source of fugitive dust emissions. However, the plant shall apply water as necessary to prevent fugitive dust problems.
  - d. Prior to the first delivery of auto fluff to the Branford Cement Plant, the permittee shall obtain a copy of a written approval (or exemption or non-applicability determination) from the requirements of the Toxic Substance and Control Act to handle and transport the permitted amount of auto fluff to the cement plant for co-firing with coal.
  - e. For each shipment of auto fluff, the permittee shall obtain from the supplier the analytical results for a representative sample taken from the shipment for: the heating value, moisture content, volatiles, ash content, sulfur content, chlorine content, fluorine content, particle size, metals (beryllium, cadmium, chromium, lead, mercury and thallium) and polychlorinated biphenyls (PCB). Prior to the initial delivery of auto fluff, the permittee shall obtain a copy of the analytical results. For subsequent deliveries, the permittee shall obtain the analytical results as soon as they are available from the supplier.
  - f. At least one day prior to the initial delivery, the permittee shall provide written notification to the Bureau of Air Regulation and the Compliance Authority of: the expected date of delivery, the approximate amount of auto fluff to be delivered, the corresponding analytical results and a preliminary schedule for conducting the trial burn. For subsequent deliveries and within two days of each delivery, the permittee shall provide written notification to the Compliance Authority of the date of delivery and the amount of auto fluff delivered. As soon as the analytical results of the subsequent deliveries are available from the supplier, the permittee shall provide copies to the Bureau of Air Regulation and the Compliance Authority. Notifications may be made by letter, facsimile or e-mail.
  - g. Once auto fluff is first fired, the permittee shall complete the trial burn within 20 successive calendar days. If unforeseen problems delay the trial burn, the plant may continue the trial for an additional 10 successive calendar days after receiving written approval by the Bureau of Air Regulation.

[Application No. 1210465-017-AC and Rule 62-210.200(PTE), F.A.C.]

3. Restricted Operation: During the trial period, auto fluff shall be co-fired with coal in the existing cement kiln

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (DRAFT)

### A. Kiln 1 System

at a maximum rate of approximately 137 MMBtu per hour, which is roughly 30% of the maximum heat input rate when firing only coal. Based on previous analytical results for auto fluff, this is approximately 10 tons of auto fluff per hour. The purpose of the trial is to determine the operational and emissions impacts for a range of firing rates (e.g. 10 tons/hour, 7.5 tons/hour and 5.0 tons/hour). During the trial period, no more than 1200 tons of auto fluff shall be burned. [Application No. 1210465-017-AC and Rule 62-210.200(PTE), F.A.C.]

4. **Re-Shredding:** If problems with feeding the auto fluff occur, the permittee may re-shred and screen the auto fluff to obtain a more desirable size. The shredder/screener system shall be equipped with a water spray system to control fugitive dust emissions if necessary. Once it is determined that re-shredding on site is necessary, the permittee shall contact the supplier and require the supplier to re-shred subsequent shipments prior to delivery to the Branford Cement Plant. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]

### COMPLIANCE WITH EXISTING PERMIT CONDITIONS

5. **Existing Permits:** This permit supplements all existing valid permits. The permittee shall continue to comply with all applicable conditions from valid air construction and operation permits. [Rule 62-4.070(3), F.A.C.]

### MONITORING REQUIREMENTS

6. **Sampling:** During the trial period and at least once every four hours that auto fluff is fired, the permittee shall take a grab sample of as-fired auto fluff from the fuel feed belt in a one gallon container (approximate). [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
7. **Analyses:** The permittee shall combine all samples of as-fired auto fluff collected during a calendar day and take a representative composite sample. The composite sample shall be analyzed for: the heating value, moisture content, volatiles, ash content, sulfur content, chlorine content, fluorine content, particle size, metals (beryllium, cadmium, chromium, lead, mercury and thallium) and PCB. The permittee shall use the same analytical methods used by the auto fluff supplier so that a direct comparison can be made. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
8. **Emissions Monitoring:** For the trial period, the plant shall continue to monitor nitrogen oxides, sulfur dioxide and total hydrocarbon emissions with the existing certified continuous emissions monitoring systems, opacity with the existing certified continuous opacity monitoring system and CO emissions with the existing process monitors. For the trial period, mercury emissions shall be calculated based on the analytical results of the auto fluff and the material balance technique currently required by permit. For the full trial, an increase in mercury emissions shall not exceed 2.4 pounds (calculated as the difference between the actual co-firing of auto fluff with coal during the trial and the firing of an equivalent amount of coal for the same heat input rate). [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]
9. **Process Monitoring:** For the trial, the plant will monitor: the average fuel feed rates, the average kiln feed rates, the average clinker production rates, the total fuel consumption rates, the temperature at the inlet to the baghouse, the number of times a trial was stopped and the reason for stopping a trial. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]

### RECORDS AND REPORTS

10. **Trial Burn Summary Report:** Within 90 days of completing the temporary trial, the permittee shall submit a report to the Bureau of Air Regulation and Compliance authority summarizing: the analytical results including a comparison between samples taken by the supplier and the permittee; problems with unloading storing or handling the auto fluff; problems with the material size and any re-shredding conducted on site; the emissions monitoring data; kiln production/process data; and a conclusion as to the feasibility and practicality of firing auto fluff as an alternative fuel. The report shall specifically identify any problems that occurred during the trial and the expected cause of the problem. [Application No. 1210465-017-AC and Rule 62-4.070(3), F.A.C.]

**SECTION 4. APPENDICES (DRAFT)**

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Appendix A. Citation Formats and Glossary of Common Terms

Appendix B. General Conditions

Appendix C. Common Conditions

**SECTION 4. APPENDIX A (DRAFT)**

**Citation Formats and Glossary of Common Terms**

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**CITATION FORMATS**

The following illustrate the formats used in the permit to identify applicable requirements from permits and regulations.

**Old Permit Numbers**

Example: Permit No. AC50-123456 or Permit No. AO50-123456

Where: “AC” identifies the permit as an Air Construction Permit  
“AO” identifies the permit as an Air Operation Permit  
“123456” identifies the specific permit project number

**New Permit Numbers**

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: “099” represents the specific county ID number in which the project is located  
“2222” represents the specific facility ID number for that county  
“001” identifies the specific permit project number  
“AC” identifies the permit as an air construction permit  
“AF” identifies the permit as a minor source federally enforceable state operation permit  
“AO” identifies the permit as a minor source air operation permit  
“AV” identifies the permit as a major Title V air operation permit

**PSD Permit Numbers**

Example: Permit No. PSD-FL-317

Where: “PSD” means issued pursuant to the preconstruction review requirements of the Prevention of Significant Deterioration of Air Quality  
“FL” means that the permit was issued by the State of Florida  
“317” identifies the specific permit project number

**Florida Administrative Code (F.A.C.)**

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

**Code of Federal Regulations (CFR)**

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

**GLOSSARY OF COMMON TERMS**

° F: degrees Fahrenheit

µg: microgram

AAQS: Ambient Air Quality Standard

acf: actual cubic feet

acfm: actual cubic feet per minute

ARMS: Air Resource Management System  
(Department’s database)

**BACT:** best available control technology

**bhp:** brake horsepower

**Btu:** British thermal units

**CAM:** compliance assurance monitoring

**CEMS:** continuous emissions monitoring system

**cfm:** cubic feet per minute

**CFR:** Code of Federal Regulations

## SECTION 4. APPENDIX A (DRAFT)

### Citation Formats and Glossary of Common Terms

<b>CAA:</b> Clean Air Act	<b>NESHAP:</b> National Emissions Standards for Hazardous Air Pollutants
<b>CMS:</b> continuous monitoring system	<b>NO<sub>x</sub>:</b> nitrogen oxides
<b>CO:</b> carbon monoxide	<b>NSPS:</b> New Source Performance Standards
<b>CO<sub>2</sub>:</b> carbon dioxide	<b>O&amp;M:</b> operation and maintenance
<b>COMS:</b> continuous opacity monitoring system	<b>O<sub>2</sub>:</b> oxygen
<b>DARM:</b> Division of Air Resource Management	<b>Pb:</b> lead
<b>DEP:</b> Department of Environmental Protection	<b>PM:</b> particulate matter
<b>Department:</b> Department of Environmental Protection	<b>PM<sub>10</sub>:</b> particulate matter with a mean aerodynamic diameter of 10 microns or less
<b>dscf:</b> dry standard cubic feet	<b>ppm:</b> parts per million
<b>dscfm:</b> dry standard cubic feet per minute	<b>ppmv:</b> parts per million by volume
<b>EPA:</b> Environmental Protection Agency	<b>ppmvd:</b> parts per million by volume, dry basis
<b>ESP:</b> electrostatic precipitator (control system for reducing particulate matter)	<b>QA:</b> quality assurance
<b>EU:</b> emissions unit	<b>QC:</b> quality control
<b>F:</b> fluoride	<b>PSD:</b> prevention of significant deterioration
<b>F.A.C.:</b> Florida Administrative Code	<b>psi:</b> pounds per square inch
<b>F.A.W.:</b> Florida Administrative Weekly	<b>PTE:</b> potential to emit
<b>F.D.:</b> forced draft	<b>RACT:</b> reasonably available control technology
<b>F.S.:</b> Florida Statutes	<b>RATA:</b> relative accuracy test audit
<b>FGD:</b> flue gas desulfurization	<b>RBLC:</b> EPA's RACT/BACT/LAER Clearinghouse
<b>FGR:</b> flue gas recirculation	<b>SAM:</b> sulfuric acid mist
<b>ft<sup>2</sup>:</b> square feet	<b>scf:</b> standard cubic feet
<b>ft<sup>3</sup>:</b> cubic feet	<b>scfm:</b> standard cubic feet per minute
<b>gpm:</b> gallons per minute	<b>SIC:</b> standard industrial classification code
<b>gr:</b> grains	<b>SIP:</b> State Implementation Plan
<b>HAP:</b> hazardous air pollutant	<b>SNCR:</b> selective non-catalytic reduction (control system used for reducing emissions of nitrogen oxides)
<b>Hg:</b> mercury	<b>SO<sub>2</sub>:</b> sulfur dioxide
<b>I.D.:</b> induced draft	<b>TPD:</b> tons/day
<b>ID:</b> identification	<b>TPH:</b> tons per hour
<b>kPa:</b> kilopascals	<b>TPY:</b> tons per year
<b>lb:</b> pound	<b>TRS:</b> total reduced sulfur
<b>MACT:</b> maximum achievable technology	<b>UTM:</b> Universal Transverse Mercator coordinate system
<b>MMBtu:</b> million British thermal units	<b>VE:</b> visible emissions
<b>MSDS:</b> material safety data sheets	<b>VOC:</b> volatile organic compounds
<b>MW:</b> megawatt	

**SECTION 4. APPENDIX B (DRAFT)**

**Common Conditions**

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.987(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules. Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.



**SECTION 4. APPENDIX B (DRAFT)**

**Common Conditions**

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
  - a. Determination of Best Available Control Technology (not applicable);
  - b. Determination of Prevention of Significant Deterioration (not applicable); and
  - c. Compliance with New Source Performance Standards (not applicable).
14. The permittee shall comply with the following:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
  - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - (a) The date, exact place, and time of sampling or measurements;
    - (b) The person responsible for performing the sampling or measurements;
    - (c) The dates analyses were performed;
    - (d) The person responsible for performing the analyses;
    - (e) The analytical techniques or methods used;
    - (f) The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

## SECTION 4. APPENDIX B (DRAFT)

### Common Conditions

Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.

#### EMISSIONS AND CONTROLS

1. **Plant Operation - Problems:** If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]
2. **Circumvention:** The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]
3. **Excess Emissions Allowed:** Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed 2 hours in any 24-hour period unless specifically authorized by the Department for longer duration. Pursuant to Rule 62-210.700(5), F.A.C., the permit subsection may specify more or less stringent requirements for periods of excess emissions. Rule 62-210-700(Excess Emissions), F.A.C., cannot vary or supersede any federal NSPS or NESHAP provision. [Rule 62-210.700(1), F.A.C.]
4. **Excess Emissions Prohibited:** Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]
5. **Excess Emissions - Notification:** In case of excess emissions resulting from malfunctions, the permittee shall notify the Compliance Authority in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]
6. **VOC or OS Emissions:** No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]
7. **Objectionable Odor Prohibited:** No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]
8. **General Visible Emissions:** No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]
9. **Unconfined Particulate Emissions:** During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. [Rule 62-296.320(4)(c), F.A.C.]

#### RECORDS AND REPORTS

10. **Records Retention:** All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least 5 years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-213.440(1)(b)2, F.A.C.]
11. **Emissions Computation and Reporting:**
  - a. **Applicability.** This rule sets forth required methodologies to be used by the owner or operator of a facility for computing actual emissions, baseline actual emissions, and net emissions increase, as defined at Rule 62-210.200, F.A.C., and for computing emissions for purposes of the reporting requirements of subsection 62-210.370(3) and paragraph 62-212.300(1)(e), F.A.C., or of any permit condition that requires emissions be computed in accordance

**SECTION 4. APPENDIX B (DRAFT)**

**Common Conditions**

with this rule. This rule is not intended to establish methodologies for determining compliance with the emission limitations of any air permit. [Rule 62-210.370(1), F.A.C.]

- b. *Computation of Emissions.* For any of the purposes set forth in subsection 62-210.370(1), F.A.C., the owner or operator of a facility shall compute emissions in accordance with the requirements set forth in this subsection.
- (1) **Basic Approach.** The owner or operator shall employ, on a pollutant-specific basis, the most accurate of the approaches set forth below to compute the emissions of a pollutant from an emissions unit; provided, however, that nothing in this rule shall be construed to require installation and operation of any continuous emissions monitoring system (CEMS), continuous parameter monitoring system (CPMS), or predictive emissions monitoring system (PEMS) not otherwise required by rule or permit, nor shall anything in this rule be construed to require performance of any stack testing not otherwise required by rule or permit.
- (a) If the emissions unit is equipped with a CEMS meeting the requirements of paragraph 62-210.370(2)(b), F.A.C., the owner or operator shall use such CEMS to compute the emissions of the pollutant, unless the owner or operator demonstrates to the department that an alternative approach is more accurate because the CEMS represents still-emerging technology.
- (b) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C, but emissions of the pollutant can be computed pursuant to the mass balance methodology of paragraph 62-210.370(2)(c), F.A.C., the owner or operator shall use such methodology, unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (c) If a CEMS is not available or does not meet the requirements of paragraph 62-210.370(2)(b), F.A.C., and emissions cannot be computed pursuant to the mass balance methodology, the owner or operator shall use an emission factor meeting the requirements of paragraph 62-210.370(2)(d), F.A.C., unless the owner or operator demonstrates to the department that an alternative approach is more accurate.
- (2) **Continuous Emissions Monitoring System (CEMS).**
- (a) An owner or operator may use a CEMS to compute emissions of a pollutant for purposes of this rule provided:
- 1) The CEMS complies with the applicable certification and quality assurance requirements of 40 CFR Part 60, Appendices B and F, or, for an acid rain unit, the certification and quality assurance requirements of 40 CFR Part 75, all adopted by reference at Rule 62-204.800, F.A.C.; or
- 2) The owner or operator demonstrates that the CEMS otherwise represents the most accurate means of computing emissions for purposes of this rule.
- (b) Stack gas volumetric flow rates used with the CEMS to compute emissions shall be obtained by the most accurate of the following methods as demonstrated by the owner or operator:
- 1) A calibrated flow meter that records data on a continuous basis, if available; or
- 2) The average flow rate of all valid stack tests conducted during a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
- (c) The owner or operator may use CEMS data in combination with an appropriate f-factor, heat input data, and any other necessary parameters to compute emissions if such method is demonstrated by the owner or operator to be more accurate than using a stack gas volumetric flow rate as set forth at subparagraph 62-210.370(2)(b)2., F.A.C., above.
- (3) **Mass Balance Calculations.**
- (a) An owner or operator may use mass balance calculations to compute emissions of a pollutant for purposes of this rule provided the owner or operator:
- 1) Demonstrates a means of validating the content of the pollutant that is contained in or created by all materials or fuels used in or at the emissions unit; and

## Common Conditions

- 2) Assumes that the emissions unit emits all of the pollutant that is contained in or created by any material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process or in the capture and destruction of the pollutant by the unit's air pollution control equipment.
  - (b) Where the vendor of a raw material or fuel which is used in or at the emissions unit publishes a range of pollutant content from such material or fuel, the owner or operator shall use the highest value of the range to compute the emissions, unless the owner or operator demonstrates using site-specific data that another content within the range is more accurate.
  - (c) In the case of an emissions unit using coatings or solvents, the owner or operator shall document, through purchase receipts, records and sales receipts, the beginning and ending VOC inventories, the amount of VOC purchased during the computational period, and the amount of VOC disposed of in the liquid phase during such period.
- (4) Emission Factors.
- a. An owner or operator may use an emission factor to compute emissions of a pollutant for purposes of this rule provided the emission factor is based on site-specific data such as stack test data, where available, unless the owner or operator demonstrates to the department that an alternative emission factor is more accurate. An owner or operator using site-specific data to derive an emission factor, or set of factors, shall meet the following requirements.
    - 1) If stack test data are used, the emission factor shall be based on the average emissions per unit of input, output, or gas volume, whichever is appropriate, of all valid stack tests conducted during at least a five-year period encompassing the period over which the emissions are being computed, provided all stack tests used shall represent the same operational and physical configuration of the unit.
    - 2) Multiple emission factors shall be used as necessary to account for variations in emission rate associated with variations in the emissions unit's operating rate or operating conditions during the period over which emissions are computed.
    - 3) The owner or operator shall compute emissions by multiplying the appropriate emission factor by the appropriate input, output or gas volume value for the period over which the emissions are computed. The owner or operator shall not compute emissions by converting an emission factor to pounds per hour and then multiplying by hours of operation, unless the owner or operator demonstrates that such computation is the most accurate method available.
  - b. If site-specific data are not available to derive an emission factor, the owner or operator may use a published emission factor directly applicable to the process for which emissions are computed. If no directly-applicable emission factor is available, the owner or operator may use a factor based on a similar, but different, process.
- (5) Accounting for Emissions During Periods of Missing Data from CEMS, PEMS, or CPMS. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of missing data from CEMS, PEMS, or CPMS using other site-specific data to generate a reasonable estimate of such emissions.
- (6) Accounting for Emissions During Periods of Startup and Shutdown. In computing the emissions of a pollutant, the owner or operator shall account for the emissions during periods of startup and shutdown of the emissions unit.
- (7) Fugitive Emissions. In computing the emissions of a pollutant from a facility or emissions unit, the owner or operator shall account for the fugitive emissions of the pollutant, to the extent quantifiable, associated with such facility or emissions unit.
- (8) Recordkeeping. The owner or operator shall retain a copy of all records used to compute emissions pursuant to this rule for a period of five years from the date on which such emissions information is submitted to the department for any regulatory purpose.

SECTION 4. APPENDIX B (DRAFT)

Common Conditions

[Rule 62-210.370(2), F.A.C.]

c. *Annual Operating Report for Air Pollutant Emitting Facility*

- (1) The Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be completed each year for the following facilities:
  - a. All Title V sources.
  - b. All synthetic non-Title V sources.
  - c. All facilities with the potential to emit ten (10) tons per year or more of volatile organic compounds or twenty-five (25) tons per year or more of nitrogen oxides and located in an ozone nonattainment area or ozone air quality maintenance area.
  - d. All facilities for which an annual operating report is required by rule or permit.
- (2) Notwithstanding paragraph 62-210.370(3)(a), F.A.C., no annual operating report shall be required for any facility operating under an air general permit.
- (3) The annual operating report shall be submitted to the appropriate Department of Environmental Protection (DEP) division, district or DEP-approved local air pollution control program office by April 1 of the following year. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office.
- (4) Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C., for purposes of the annual operating report.
- (5) Facility Relocation. Unless otherwise provided by rule or more stringent permit condition, the owner or operator of a relocatable facility must submit a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department at least 30 days prior to the relocation. A separate form shall be submitted for each facility in the case of the relocation of multiple facilities which are jointly owned or operated.

[Rule 62-210.370(3), F.A.C.]

## Livingston, Sylvania

---

**From:** Livingston, Sylvania  
**Sent:** Friday, September 18, 2009 2:16 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'mlee@kooglerassociates.com'; Strong, Greg; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR); 'commissioners@suwcounty.org'; 'bocc@alachuacounty.us'; 'chris@alachuacounty.us'; Greenhalgh, Tom; 'mark.latch@dep.state.fl.us'; 'long5892@bellsouth.net'; 'RobBrinkman@cox.net'; 'lmcshe2001@aol.com'; 'Svenn@ichetucknee.org'; 'bruderly@aol.com'; 'pat@hydrogeology.com'; 'kacmd@aol.com'; 'cyagel@bellsouth.net'; 'parrino6@aol.com'; 'sisotter@gator.net'; 'arttek@gate.net'; 'medjob@jobs4u.com'  
**Subject:** SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC  
**Attachments:** 1210465-017-AC\_Intent.pdf

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.017.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.017.AC.D_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

**Project Number:** 1210465-017-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION/ Temporary Short-Term Trail of Auto Fluff

**Facility County:** SUWANNEE

**Processor:** Jeff Koerner

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Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

Sylvia Livingston  
Bureau of Air Regulation

## Livingston, Sylvania

---

**From:** Messer Tom [tomm@suwanneecement.com]  
**Sent:** Thursday, September 24, 2009 1:21 PM  
**To:** Livingston, Sylvania  
**Subject:** RE: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

Thanks Sylvania.

---

**From:** Livingston, Sylvania [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Thursday, September 24, 2009 12:24 PM  
**To:** Messer Tom  
**Subject:** FW: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

Dear Mr. Messer:

We have not received confirmation that you were able to access the documents attached to this September 18th e-mail. Please confirm receipt by opening the attachment 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, Sylvania  
**Sent:** Friday, September 18, 2009 2:16 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'mlee@kooglerassociates.com'; Strong, Greg; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR); 'commissioners@suwcounty.org'; 'bocc@alachuacounty.us'; 'chris@alachuacounty.us'; Greenhalgh, Tom; 'mark.latch@dep.state.fl.us'; 'long5892@bellsouth.net'; 'RobBrinkman@cox.net'; 'lmcsh2001@aol.com'; 'Sven@ichetucknee.org'; 'bruderly@aol.com'; 'pat@hydrogeology.com'; 'kacmd@aol.com'; 'cyagel@bellsouth.net'; 'parrino6@aol.com'; 'sisotter@gator.net'; 'arttek@gate.net'; 'medjob@jobs4u.com'  
**Subject:** SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

*Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).*

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.017.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.017.AC.D_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

**Project Number:** 1210465-017-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION/ Temporary Short-Term Trail of Auto Fluff

**Facility County:** SUWANNEE

**Processor:** Jeff Koerner

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<http://www.dep.state.fl.us/air/eproducts/apds/default.asp> .

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation

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)

Note: The attached 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>>



## Livingston, Sylvia

---

**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Monday, September 21, 2009 12:31 PM  
**To:** Livingston, Sylvia  
**Subject:** RE: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

got it, Thanks Silvia.

---

**From:** Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]  
**Sent:** Friday, September 18, 2009 2:16 PM  
**To:** tomm@suwanneecement.com  
**Cc:** jbhorton@suwanneecement.com; celsom@vcsmc.com; mlee@kooglerassociates.com; Strong, Greg; Kirts, Christopher; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR); commissioners@suwcounty.org; boccc@alachuacounty.us; chris@alachuacounty.us; Greenhalgh, Tom; mark.latch@dep.state.fl.us; long5892@bellsouth.net; RobBrinkman@cox.net; lmcsh2001@aol.com; Svenn@ichetucknee.org; bruderly@aol.com; pat@hydrogeology.com; kacmd@aol.com; cyagel@bellsouth.net; parrino6@aol.com; sisotter@gator.net; arttek@gate.net; medjob@jobs4u.com  
**Subject:** SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.017.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.017.AC.D_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

**Project Number:** 1210465-017-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION/ Temporary Short-Term Trail of Auto Fluff

**Facility County:** SUWANNEE

**Processor:** Jeff Koerner

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## Livingston, Sylvia

---

**From:** The Longs [long5892@bellsouth.net]  
**Sent:** Sunday, September 20, 2009 12:55 PM  
**To:** Livingston, Sylvia  
**Subject:** Re: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

Hello,

I recieved the six documents listed on the page from the link in your e-mail. Thank you for sending this information to Save Our Suwannee, Inc.

Annette Long

---

**From:** "Livingston, Sylvia" <Sylvia.Livingston@dep.state.fl.us>  
**To:** tomm@suwanneecement.com  
**Cc:** jbhorton@suwanneecement.com; celsom@vcsmc.com; mlee@kooglerassociates.com; "Strong, Greg" <Greg.Strong@dep.state.fl.us>; "Kirts, Christopher" <Christopher.Kirts@dep.state.fl.us>; forney.kathleen@epa.gov; abrams.heather@epa.gov; oquendo.ana@epa.gov; "Gibson, Victoria" <Victoria.Gibson@dep.state.fl.us>; "Koerner, Jeff" <Jeff.Koerner@dep.state.fl.us>; "Walker, Elizabeth (AIR)" <Elizabeth.Walker@dep.state.fl.us>; commissioners@suwcounty.org; bocc@alachuacounty.us; chris@alachuacounty.us; "Greenhalgh, Tom" <Tom.Greenhalgh@dep.state.fl.us>; mark.latch@dep.state.fl.us; long5892@bellsouth.net; RobBrinkman@cox.net; lmcsh2001@aol.com; Svenn@ichetucknee.org; bruderly@aol.com; pat@hydrogeology.com; kacmd@aol.com; cyagel@bellsouth.net; parrino6@aol.com; sisotter@gator.net; arttek@gate.net; medjob@jobs4u.com  
**Sent:** Friday, September 18, 2009 2:16:19 PM  
**Subject:** SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; 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".

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[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.017.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.017.AC.D_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.

**Facility Name:** SUWANNEE AMERICAN CEMENT

**Project Number:** 1210465-017-AC

**Permit Status:** DRAFT

**Permit Activity:** CONSTRUCTION/ Temporary Short-Term Trail of Auto Fluff

**Facility County:** SUWANNEE

**Processor:** Jeff Koerner

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## Livingston, Sylvia

---

**From:** Livingston, Sylvia  
**Sent:** Thursday, September 24, 2009 12:13 PM  
**To:** 'commissioners@suwcounty.org'  
**Cc:** 'KASEYS@SUWCOUNTY.ORG'  
**Subject:** FW: SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC  
**Attachments:** 1210465-017-AC\_Intent.pdf

This e-mail is being resent in an attempt to reach Suwannee County Commissioners. An attempt was made on Friday, September 18, 2009 resulted in an undeliverable e-mail.

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)

---

**From:** Livingston, Sylvia  
**Sent:** Friday, September 18, 2009 2:16 PM  
**To:** 'tomm@suwanneecement.com'  
**Cc:** 'jbhorton@suwanneecement.com'; 'celsom@vcsmc.com'; 'mlee@kooglerassociates.com'; Strong, Greg; Kirts, Christopher; 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'; 'oquendo.ana@epa.gov'; Gibson, Victoria; Koerner, Jeff; Walker, Elizabeth (AIR); 'commissioners@suwcounty.org'; 'bocc@alachuacounty.us'; 'chris@alachuacounty.us'; Greenhalgh, Tom; 'mark.latch@dep.state.fl.us'; 'long5892@bellsouth.net'; 'RobBrinkman@cox.net'; 'lmcsh2001@aol.com'; 'Svenn@ichetucknee.org'; 'bruderly@aol.com'; 'pat@hydrogeology.com'; 'kacmd@aol.com'; 'cyagel@bellsouth.net'; 'parrino6@aol.com'; 'sisotter@gator.net'; 'arttek@gate.net'; 'medjob@jobs4u.com'  
**Subject:** SUWANNEE AMERICAN CEMENT, LLC - Branford Cement Plant; 1210465-017-AC

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**Click on the following link to access the permit project documents:**

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/1210465.017.AC.D\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.017.AC.D_pdf.zip)

**Owner/Company Name:** SUWANNEE AMERICAN CEMENT CO.  
**Facility Name:** SUWANNEE AMERICAN CEMENT  
**Project Number:** 1210465-017-AC  
**Permit Status:** DRAFT  
**Permit Activity:** CONSTRUCTION/ Temporary Short-Term Trail of Auto Fluff  
**Facility County:** SUWANNEE  
**Processor:** Jeff Koerner

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

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

RALPH ASHODIAN  
 17819 NW 32<sup>nd</sup> AVE  
 NEWBURY, FL 32669-2163

2. Article Number

(Transfer from service label)

7005 1820 0007 9819 8733

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-154C

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

*Ralph Ashodian*

- Agent
- Addressee

B. Received by (Printed Name)

*Ralph Ashodian*

C. Date of Delivery

*10/13/08*

D. Is delivery address different from item label? If YES, enter delivery address below:

- Yes
- No



3. Service Type

- Certified Mail
- Registered
- Insured Mail
- Express Mail
- Return Receipt for Merchandise
- C.O.D.

4. Restricted Delivery? (Extra Fee)

- Yes

UNITED STATES POSTAL SERVICE

RECEIVED

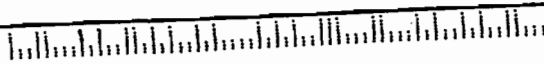


First-Class Mail  
 Postage & Fees Paid  
 USPS  
 Permit No. G-10

OCT 14 2008  
 • Sender: Please print your name, address, and ZIP+4 in this box •

BUREAU OF AIR REGULATION

*1210465-017-02*  
 MS# 5505 MC ACCT# 5515  
 FLORIDA DEPT OF ENVIRONMENTAL  
 PROTECTION  
 MAIL STATION 5505  
 2600 BLAIRSTONE RD  
 TALLAHASSEE, FL 32399-2400



UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

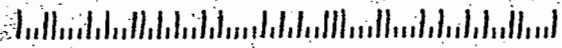
MS# 5505 MC ACCT# 5515  
FLORIDA DEPT OF ENVIRONMENTAL  
PROTECTION  
MAIL STATION 5505  
2600 BLAIRSTONE RD  
TALLAHASSEE, FL 32399-2400

RECEIVED

SEP 30 2009

BUREAU OF AIR REGULATION

9+2400



**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

HELEN BEATY  
1301 MAYMONT DR  
MURFREESBORO, TN 37130-2316

2. Article Number  
(Transfer from service label)

7005 1820 0007 9819 8672

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee

B. Received by (Printed Name) C. Date of Delivery  
Jesse S. [Signature] 9-24

D. Is delivery address different from item 1?  Yes  
If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes



*Interoffice Memorandum*

To: Jeffery F. Koerner, PE

CC:

From: Krishna C. Cole

Date: 9/30/2009

Re: 1210465-017-AC – Copy of published “Notice of Intent to Issue”

---

RECEIVED

OCT 02 2009

BUREAU OF AIR REGULATION

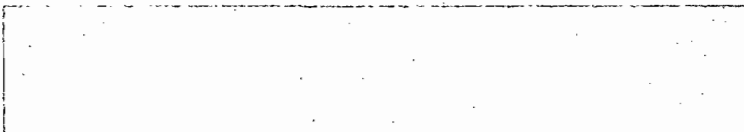
---

Jeff,

Please find enclosed a notarized copy of the “Notice of Intent to Issue” that was published in the Suwannee Democrat’s legal section on Friday, September 25, 2009.

Thank you,

Krishna



**Permit File Scanning Request from Elizabeth**

**Priority:**   -ASAP (Public Records Request, etc.)                      -Place in Normal Scanning Queue

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
1210445	017	AC		SEP 15 2010	

- File Approved For Disposal
- Return File to BAR

- Correspondence     Intent     Permit     Draft
- Amendment     Application     OGC     Proposed

Document Date 10-2-09

THE SUWANNEE DEMOCRAT  
Published Weekly  
Post Office Box 370- Phone 362-1734  
Live Oak, Suwannee County, Florida 32064

STATE OF FLORIDA  
COUNTY OF SUWANNEE:

Before the undersigned authority personally appeared

Janice K. Ganote

who on oath says that she is  
Legal Secretary

of The Suwannee Democrat, a weekly newspaper  
published at Live Oak in Suwannee County, Florida;  
that the attached copy of advertisement, being a

PUBLIC NOTICE OF INTENT

in the matter of

AIR PERMIT #1210465-017-AC

was published in said newspaper in the issues of

9/25, 2009

Affiant further says that the said, The Suwannee Democrat is a newspaper published at Live Oak in said Suwannee County, Florida, and that the said newspaper has heretofore been continuously published in said Suwannee County, Florida, each week and has been entered as second class mail matter at the post office in Live Oak, in said Suwannee County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

*See Back*

*Janice K. Ganote*

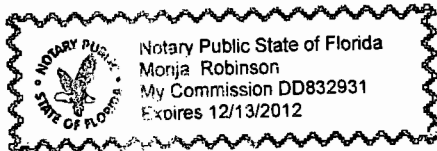
Sworn to and subscribed before me this 25th day of  
September, 2009.

*Morja Robinson*

(SEAL) Notary Public

Personally known X or produced identification \_\_\_\_\_

Type of identification produced \_\_\_\_\_





**Project:** The applicant requests authorization to conduct a temporary short-term trial to co-fire up to 1200 tons of "auto fluff" in the existing Kiln 1 system over approximately a 20-day trial period. Auto fluff is a byproduct of the metal recycling process consisting of a shredded mixture of non-ferrous materials including plastics, foam, rubber and glass that comes from scrap automobiles. The mixture of materials contains a significant heating value that can be used to displace the firing of some coal in the cement kiln. The purpose of the project is to determine whether this material is feasible and practical for further consideration as an alternative fuel for the cement kiln. Auto fluff may contain mercury if the mercury-containing switches are not removed from the automobile before shredding.

As a worst-case scenario, the project will potentially emit an additional 2.4 pounds mercury and 3.7 pounds lead based on: the maximum expected metal concentrations of auto fluff; 1200 tons of auto fluff; the assumption that all of the volatile mercury is emitted; and the assumption that more than 99.99% of the low-volatile lead is bound to the cement clinker produced by the kiln. The project must continue to comply with all current emissions standards including mercury. Emissions increases of other pollutants are expected to be negligible. The existing kiln has high operating temperatures with a long residence time and is designed to fire a variety of alternative fuels while minimizing emissions of carbon monoxide and volatile organic compounds. Acid gases will be naturally scrubbed by lime in the cement kiln. Non-volatile metals will be bound to the cement clinker produced by the kiln. A selective non-catalytic reduction system is used to control emissions of nitrogen oxides. A fabric filter system is used to control emissions of particulate matter.

This project is subject to the general preconstruction review requirements in Rule 62-212.300, Florida Administrative Code (F.A.C.) and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

**Permitting Authority:** Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Bureau of Air Regulation in the Department of Environmental Protection's Division of Air Resource Management. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

**Project File:** A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site by entering draft permit number: "http://www.dep.state.fl.us/air/emission/pds/default.asp"

The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

**Comments:** The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

**Petitions:** A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of

precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available for this proceeding.  
9/25

**PUBLIC NOTICE OF INTENT  
TO ISSUE AIR PERMIT**

**Florida Department of Environmental  
Protection Division of Air Resource  
Management, Bureau of Air  
Regulation Draft Air Construction  
Permit Project No. 1210465-017-AC  
Suwannee American Cement, LLC,  
Branford Cement Plant Suwannee  
County, Florida**

**Applicant:** The applicant for this project is Suwannee American Cement, LLC. The applicant's authorized representative and mailing address are: Mr. Tom Messer, Plant Manager, Suwannee American Cement, LLC, Branford Cement Plant, 5117 U.S. Highway 27, and Branford, Florida, 32008.

**Facility Location:** Suwannee American Cement, LLC operates an existing Portland cement plant, which is located

**Walker, Elizabeth (AIR)**

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**From:** Livingston, Sylvia  
**Sent:** Tuesday, September 15, 2009 2:07 PM  
**To:** 'forney.kathleen@epa.gov'; 'abrams.heather@epa.gov'  
**Cc:** Felton-Smith, Rita; Koerner, Jeff; Walker, Elizabeth (AIR)  
**Subject:** Suwannee American Cement Co (1210465-017-AC)

A new **Permit Application** has been received at FL Department of Environmental Protection Div. of Air Resource Management and is currently under review.

**Link to Permit Application Documents:**

<http://arm-permit2k.dep.state.fl.us/psd/1210465/00004054.pdf>

<b>ARMS PA Project ID:</b>	1210465-017-AC
<b>Facility Name:</b>	SUWANNEE AMERICAN CEMENT CO
<b>Florida County:</b>	Suwannee
<b>Project Description:</b>	ASR TEST BURN IN CEMENT KILN
<b>Permit Application Processor:</b>	Jeff Koerner
<b>Processor Phone:</b>	(850) 921-9536
<b>Processor Email Address:</b>	<a href="mailto:Jeff.Koerner@dep.state.fl.us">Jeff.Koerner@dep.state.fl.us</a>
<b>Received in-house:</b>	9/11/09

Please direct any questions regarding this permit application to the permit application processor. If you have any problems accessing these documents please let me know.

Thanks,

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)

Permit File Scanning Request from Elizabeth

Priority: -ASAP (Public Records Request, etc.) -Place in Normal Scanning Queue

Facility ID	Project#	Type	PSD #	Submittal Date	Batch #
12164165	017	AC		SEP 15 2010	

- File Approved For Disposal  
 Return File to BAR

- Correspondence  Intent  Permit  Draft  
 Amendment  Application  OGC  Proposed

Document Date 9-15-09