

Candy Mulkey

FINAL DETERMINATION

Suwannee American Cement Plant

Wheel Wash and Clinker Scale

DEP File No. 1210465-010-AC (PSD-FL-259E)

On November 24, 2004 the Florida Department of Environmental Protection (Department) distributed an "Intent to Issue Air Construction Permit Modification" to clarify permit language in reference to additional means to determine clinker production and to remove the wheel wash requirement for the Suwannee American Cement Plant located on U.S. Highway 27, in Suwannee County.

The package included the Department's Draft Air Construction Permit Modification, the "Intent to Issue Air Construction Permit Modification," the "Technical Evaluation and Preliminary Determination," and the "Public Notice of Intent to Issue Air Construction Permit Modification." The Department sent copies of the package to various persons, agencies, and municipalities including those who had asked that they be informed of any Department permitting activities related to the subject facility. Suwannee American Cement, LLC published the Public Notice in The Suwannee Democrat on December 8, 2004 and provided to the Department the required proof of publication.

The Department received no comments or petitions for administrative hearings on the Draft Air Construction Permit. The final action is to issue the Air Construction Permit Modification as drafted.



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

December 23, 2004

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Celso A. Martini, Plant Manager
Suwannee American Cement
Post Office Box 410
Branford, Florida 32008

Re: DEP File No. 1210465-010-AC (PSD-FL-259E)
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

The Florida Department of Environmental Protection (“the Department”) reviewed your application dated August 6, 2004 requesting a modification of the original air construction permit. The request is to amend requirements related to fugitive particulate control and production measurement at the Suwannee American Cement Plant. The Department approves your request and hereby modifies permit No. PSD-FL-259 as follows:

This facility was originally authorized and constructed pursuant to Permit No. PSD-FL-259 issued on June 1, 2000. This permit action supplements Permit No. PSD-FL-259 and the changes dated November 8, 2002, January 18, 2003, and May 15, 2003 to that permit. Unless otherwise specified, this permit action does not alter any requirements of that permit.

Additions are underlined; deletions are strikethrough.

SECTION II. FACILITY-WIDE SPECIFIC CONDITIONS

EMISSION LIMITING STANDARDS

10. Unconfined Emissions of Particulate Matter: [Rule 62-296.320(4)(c), F.A.C. and BACT]

- (a) No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.

“More Protection, Less Process”

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(b) Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.

(c) Reasonable precautions include the following:

- Paving and maintenance of roads, parking areas and yards.
- Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
- Application of asphalt, water, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
- Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
- Landscaping or planting of vegetation.
- Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
- Confining abrasive blasting where possible.
- Enclosure or covering of conveyor systems.

Additional reasonable precautions applicable to this facility are:

- All materials, coal and petroleum coke at the plant shall be stored under roof on compacted clay or concrete, or in enclosed vessels.
- Water supply lines, hoses and sprinklers shall be located near all materials, coal and petroleum coke stockpiles.
- All plant operators shall be trained in basic environmental compliance and shall perform visual inspections of materials, coal and petroleum coke regularly and before handling. If the visual inspections indicate a lack of surface moisture, the materials, coal and petroleum coke shall be wetted with sprinklers. Such wetting shall continue until the potential for unconfined particulate matter emissions are minimized.
- Water spray bars shall be located at each unenclosed material and fuel conveyor, and the spray bars shall be used to wet the materials and fuel if inherent moisture and moisture from wetting the storage piles are not sufficient to prevent unconfined particulate matter emissions.
- The manufacturing area and the access roadways for the facility shall be paved with asphalt or concrete.
- The main access road leading to the plant and the road leading to the cement silos shall be cleaned with a mechanical broom sweeper on an as needed basis for particulate control on the roads within the facility.
- The existing wheel wash will remain in place and available to be employed should conditions at the facility warrant additional reasonable precautions for the control of PM_{10} .

- ~~Bulk transport trucks leaving the plant shall travel through a tire wash, designed to remove particulate matter from vehicle tires, before traveling on the facility's access roadways.~~

(d) In determining what constitutes reasonable precautions for a particular source, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

SECTION III. EMISSIONS UNIT SPECIFIC CONDITIONS

SUBSECTION B.

STATE REQUIREMENTS

REPORTING AND RECORD KEEPING REQUIREMENTS

24. Records of Process and Production Rates: The owner or operator shall make and maintain records of the process rate of dry preheater feed in units of tons per hour and tons per consecutive 12-month period, and the production rate of clinker and cement in units of tons per hour and tons per consecutive 12-month period. ~~The clinker production rate shall be directly measured independent of preheater feed.~~ The owner or operator shall make and maintain records of the production of portland cement in units of tons per consecutive 12-month period. Records in units of tons per hour shall be based on either hourly averages or daily averages and shall be completed no later than the day following the day of the record. Records in units of tons per consecutive 12-month period shall be made from monthly records of process and production rates for the past 12 months, and shall be completed no later than the 10th day of each month. [Rule 62-4.070(3), F.A.C. and BACT]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Any party to this permitting decision (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 thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida



Michael G. Cooke, Director
Division of Air Resource
Management

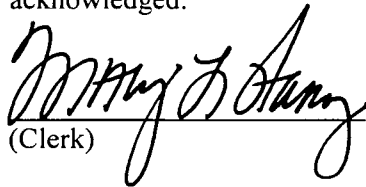
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this PERMIT MODIFICATION was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 12/28/04 to the person(s) listed:

Celso Martini, SAC*	Jim Stevenson, DEP	Patrice Boyes, Esq.*
Claude Grinfeder, SAC*	Tom Workman, DEP	Kathy Cantwell
George Townsend, SAC	Mark Latch, DEP	Ralph Ashodian
Larry Sellers, Esq.*	December McSherry	Virginia Seacrist
Frank Darabi, P.E.	Svenn Lindskold	Bob and Lynn Milner
Steve Cullen, P.E.	Tom Greenhalgh*	Linda Pollini
John Koogler, P.E.	Dave Bruderly	Helen Beaty
Chris Kirts, DEP NED	Chris Bird, Alachua Co. DER	Bessie Robinson
Jim Little, EPA	Chair, Alachua Co. BCC*	Craig Pittman, St. Pete Times
John Bunyak, NPS	J. Calvin Gaddy	Chuck Yagel*

Clerk Stamp

FILED AND ACKNOWLEDGMENT
FILED, on this date, pursuant to §120.52,
Florida Statutes, with the designated
Department Clerk, receipt of which is hereby
acknowledged.


(Clerk)

12/28/04
(Date)