



Suwannee American Cement
P.O. Box 410
Branford, FL 32008-0410
Phone (386) 935-5000 Fax (386) 935-5080

RECEIVED

JAN 17 2012

DIVISION OF AIR
RESOURCE MANAGEMENT

January 9, 2012

Florida Department of Environmental Protection
Division of Air Resource Management
Christy Devore
2600 Blair Stone Road, M.S. 5500
Tallahassee, FL 32399-0400

Re: Permit 1210465-023
Notice of Application - Public Notice Record

Dear Ms. Devore:

Please find enclosed a notarized copy of the Public Notice of Application published on December 30, 2011 in the legal classified section of the Suwannee Democrat.

Let me know if I can be of any further assistance. If you have any questions or comments you can contact me as follows:

(386) 935-5023 office
(386) 965-3866 cell
Email: krishnac@vcsmc.com

Sincerely,

A handwritten signature in cursive script that reads "Krishna C. Cole".

Krishna C. Cole
Environmental Engineer

RECEIVED

JAN 17 2012

DIVISION OF AIR RESOURCE MANAGEMENT

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

LOUISE SHEDDAN

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

in the matter of

FL DEP NOTICE OF APPLICATION

was published in said newspaper in the issues of

DECEMBER 30, 2011

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 pur-
pose of securing this advertisement for publication
in said newspaper.

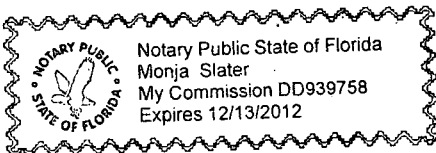
Louise Sheddan (signature)

Sworn to and subscribed before me this 3rd day of
January, 2012.

Monja Slater (signature)
(SEAL) Notary Public

Personally known X or produced identification

Type of identification produced



Notice of APPLICATION
Florida Department of Environmental
Protection Division of Air Resource
Management, Office of Permitting and
Compliance Project No. 1210465-023-
AC-Suwannee American Cement,
Branford Cement Plant
Suwannee County, Florida

Applicant: The applicant for this project
is Suwannee American Cement. The
applicant's authorized representative and
mailing address is: Mr. Tom Messer,
Plant Manager, Suwannee American
Cement, Suwannee American Cement
Plant, Post Office Box 410, Branford,
Florida 32008.

Facility Location: Suwannee American
Cement operates the existing Branford
Cement Plant, which is located in
Suwannee County at 5117 U.S. Highway
27 in Branford, Florida.

The Department of Environmental Pro-
tection announces receipt of an ap-
plication for an air construction permit
from Suwannee American Cement. The
application requests authorization to:
modify the calciner duct by increasing the
height of the post-combustion chamber to
increase fuel retention time resulting in
improved combustion efficiency; con-
struct mechanical and pneumatic ma-
terial handling systems for introduction of
alternative fuels into the existing pre-
heater/precalciner kiln system; and re-
place or modify the main kiln burner to
allow introduction of alternative fuels.
These modifications will not increase
production capacity or allow exceedance
of currently permitted emissions.

The cement kiln is currently authorized to
fire coal, petroleum coke, and natural gas.
The plant is also conducting trial burns for
a variety of alternative solid fuels. Based
on newly developed available information
regarding the firing of non-hazardous al-
ternative fuels in cement kilns, once the
proposed construction is complete, the
plant requests permanent authorization to
fire the proposed non-hazardous al-
ternative fuels, in any combination with
other authorized fuels, in the existing
cement kiln. Upon the installation of al-
ternative fuel-related equipment, the
equipment must complete an evaluation
period (i.e., shakedown) and evaluation
and assessment for each alternative fuel.
Once the proposed construction project is
complete, the plant may request the
equipment and alternative fuels be in-
corporated into the Title V air operation
permit. The plant requests authorization
to fire the following non-hazardous al-
ternative fuels, in the existing cement kiln:

a. Engineered Fuel (EF) is engineered to
have targeted, consistent fuel properties
such as: calorific value, moisture, particle
size, ash content, and volatility. The
specific targeted properties are es-
tablished based on available alternative
fuel material supply and are carefully
controlled through blending of non-
hazardous combustible materials or
through separation of non-hazardous in-
combustible materials from combustible
materials (mixes of any alternative fuels
where the blending and processing may
also include the addition of on-speci-
fication and off-specification used oils or
other non-hazardous liquids to ensure
consistent and predictable fuel
properties). (Note: After all alternative
fuels are assessed, it is likely that EF will
be the primary alternative fuel, prepared
by Suwannee American Cement from
available individual materials as listed
below (such as: wood, plastic, carpet,
paper, roofing material, tires, etc.) or EF
may be provided by a supplier that can
meet SAC's targeted fuel quality re-
quirements. Targets for the fuel quality
may change, but shall be set to ensure at
a minimum that the EF contaminant
concentrations and fuel properties are
similar to currently approved fuels).

b. Tire-Derived Fuel (TDF), which in-
cludes whole and shredded tires with or
without steel belt material including
portions of tires such as tirefluff.

c. Roofing Materials, which consists of
roofing shingles and related roofing
materials with the bulk of the incom-
bustible grit material separated and which
is not subject to regulations as an as-
bestos-containing material per 40 CFR 61
subpart M.

d. Plastics, which includes materials such
as polyethylene; plastic used in agri-
cultural and silvicultural operations. This
may include incidental amounts of
chlorinated plastics. (Note: The permit
application addresses the negative im-
pact of chlorinated plastics on the kiln
system and product to further ensure
plastics will only have limited amount of
chlorinated plastics).

e. Agricultural Biogenic Materials, which
includes materials such as peanut hulls,
rice hulls, corn husks, citrus peels, cotton
gin byproducts, animal bedding and other
similar types of materials.

f. Cellulosic Biomass - Untreated, which
includes materials such as untreated
lumber, tree stumps, tree limbs, slash,
bark, sawdust, sander dust, wood chips
scraps, wood scraps, wood slabs, wood
millings, wood shavings and processed
pellets made from wood or other forest
residues.

g. Cellulosic Biomass - Treated, which
includes preservative-treated wood that
may contain treatments such as creosote,
copper-chromium-arsenic (CCA), or al-
kaline copper quaternary (ACQ), painted
wood, or resinated woods (plywood,
particle board, medium density fiber-
board, oriented strand board, laminated
beams, finger-jointed trim and other sheet
goods). The permittee shall not fire more
than 1,000 lb/hour averaged on a 7-day
block average basis of segregated
streams of wood treated with copper-
chromium-arsenic (CCA) compounds.
(Note: The majority of CCA compounds
are expected to be integrated into the
cement clinker product. The input rate is
approximately 1percent of typical kiln heat
input rate).

h. Carpet-Derived Fuel, which includes
shredded new, reject or used carpet.
(Note: may contain incidental related
materials (e.g., tack-down strips, nails,
etc.)).

i. Biosolids, which includes organic ma-
terials sanitized to meet EPA Class A
sanitization standards and is derived from
treatment processes of public treatment
water systems.

j. Alternative Fuel (AF) Mix, which in-
cludes a blended combination of two or
more of any of the above materials.
(Note: Separate classification from an
engineered fuel since the consistency of
the material may not be designed/en-
gineered to meet specific, targeted fuel
properties).

The applicant proposes to use alternative
fuels for cement production to reduce
greenhouse gases and its reliance on
fossil fuels, such as coal. The project in-
cludes electric or diesel-powered
shredding and screening equipment to
further process these materials as ne-
cessary.

Over ->

The modified kiln system will continue to meet all current emission limits when alternative fuels are used. Actual emissions from the existing cement kiln are continuously monitored for the following pollutants: carbon monoxide (CO), nitrogen oxides (NOX), sulfur dioxide (SO2), and volatile organic compounds (VOC) measured as total hydrocarbons (THC). There is also a continuous monitor for measuring the stack opacity. The applicant will continue to use all required monitoring systems to ensure compliance with existing and enforceable permit requirements when firing alternative fuels. As required by permit, mercury emissions will be determined based on material balance and particulate matter emissions will be determined by stack test. The applicant does not request the relaxation of any existing permit limit and will become subject to more stringent standards applicable to Portland cement plants under Title 40, Part 63 and Subpart LLL of the Code of Federal Regulations that become effective in 2013.

The initial application was received on December 7, 2011. The application is under review by the Department and is available for public inspection during normal business hours from 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following physical office location:

Department of Environmental Protection
Office of Permitting and Compliance

111 South Magnolia Drive, Suite 4
Tallahassee, Florida 32399-2400
Telephone: 850/717-8000
Fax: 850/717-9001

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite B-200
Jacksonville, FL 32256-7590
Phone: (904) 256-1700
Fax: (904) 448-4362

The application can be accessed electronically at the Department's website at:
<http://arm.permit2k.dep.state.fl.us/psd/1210465/00066DD.pdf>
12/30

P.E. CERTIFICATION STATEMENT

PERMITTEE

Suwannee American Cement, LLC
Post Office Box 410
Branford, Florida 32008

Draft Permit No. 1210465-023-AC
Branford Cement Plant
Alternative Fuel Materials
Suwannee County, Florida

PROJECT DESCRIPTION

The applicant requests authorization for the construction of mechanical and pneumatic solid fuel handling and feed systems for the precalciner and main kiln burner; minor modifications to the calciner duct; installation of a new multi-fuel main kiln burner system; and the firing of a variety of alternative fuels (AF) including engineered fuel (EF), tire-derived fuel (TDF), roofing materials, plastics, agricultural biogenic materials, untreated cellulosic biomass, treated cellulosic biomass, carpet-derived fuel, biosolids, and an alternative fuel mix. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. The project is considered a new source review reform project. 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 62-292. 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).



S. Christine DeVore, P.E.
Registration Number 63119
2/15/12 (Date)


MAR 05 2012

Best Available Copy

DIVISION OF AIR RESOURCE MANAGEMENT

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

LOUISE SHEDDAN

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

in the matter of

INTENT TO ISSUE AIR PERMIT

was published in said newspaper in the issues of

FEBRUARY 29, 2012

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.

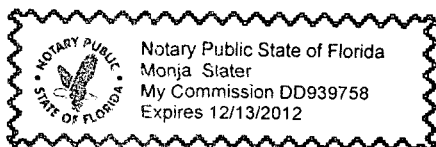
Signature of Louise Sheddan

Sworn to and subscribed before me this 29th day of February, 2012.

Signature of Notary Public Monja Slater

Personally known [X] or produced identification

Type of identification produced



PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection Division of Air Resource Management, Office of Permitting and Compliance Draft Air Construction Permit Project No. 1210465-023-AC Suwannee American Cement, Branford Cement Plant Suwannee County, Florida

Applicant: The applicant for this project is Suwannee American Cement. The applicant's authorized representative and mailing address is: Mr. Tom Messer, Plant Manager, Suwannee American Cement, Suwannee American Cement Plant, Post Office Box 410, Branford, Florida 32008.

Facility Location: Suwannee American Cement operates the existing Branford Cement Plant, which is located in Suwannee County at 5117 U.S. Highway 27 in Branford, Florida.

Project: The applicant requests authorization for the construction of mechanical and pneumatic solid fuel handling and feed systems for the pre-calciner and main kiln burner; minor modifications to the calciner duct; modification/installation of a new multi-fuel main kiln burner system; and the firing of a variety of alternative fuels (AF) including engineered fuel (EF), tire-derived fuel (TDF), roofing materials, plastics, agricultural biogenic materials, untreated cellulosic biomass, treated cellulosic biomass, carpet-derived fuel, biosolids, and an alternative fuel mix. The following emissions are continuously monitored: carbon monoxide, nitrogen oxides, sulfur dioxide, total hydrocarbons and stack opacity. The plant must continue to comply with all emissions standards.

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 Office of Permitting and Compliance 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 850/717-9000.

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/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.

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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.

02/29



Suwannee American Cement
P.O. Box 410
Branford, FL 32008-0410
Phone (386) 935-0966 Fax (386) 935-1155

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MAR 05 2012

DIVISION OF AIR
RESOURCE MANAGEMENT

MEMORANDUM

To: Christy Devore

From: Krishna Cole

Date: 2-Mar-12

cc:

Re: 1210465-023-AC Certified Copy of "Public Notice of Intent to Issue"

Syed (Kris?)

Christy,

Please find enclosed a certified copy of the "Public Notice of Intent to Issue" for air construction permit number 1210465-023-AC which was published on Wednesday, February 29th, 2012 in the Suwannee Democrat.

Thank you,
Krishna Cole