

Koerner, Jeff

From: Rob Brinkman [robbrinkman@cox.net]
Sent: Tuesday, January 31, 2006 3:11 PM
To: Koerner, Jeff
Subject: Re: Suwannee American Cement Expansion Project - Public Meeting

Attachments: Comments for FDEP public hearing on expansion of the Ichetucknee Cement Kiln.doc



Comments for FDEP
public heari...

Mr. Koerner,

Please find attached my comments that i will present tonight at the public hearing. In response to our phone conversation recently I have read all the documents referenced on the website link that you provided in the public meeting notice. I hope you will find these comments more specific to the technical issues of the permit itself. Thank you for your attention to this matter.

Sincerely,

Rob Brinkman, Chair SSJ Sierra Club



Jeff Koerner
Manager Air Permitting North Section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

January 31, 2006

Comments for FDEP public hearing on expansion of the Ichetucknee Cement Kiln

Dear Mr. Koerner:

First, I want to thank FDEP for holding this hearing. However, it is my hope that these hearings should be routine and occur early on rather than by request near the end of the permitting process. While there was a wealth of information available at the website for this permit, according to the information I was able to find SAC had not yet selected a vendor for major components of the plant, such as the SNCR and baghouse systems. Without the selection of these components, it is hard, from the information available on the website, to understand how an engineer could have certified compliance with the regulatory requirements of the draft permit.

Upon reading the draft permit and associated documents, it would appear impressive that FDEP consistently determined a slightly more restrictive regulatory threshold than the applicant, SAC, proposed. It was so consistent that frankly one begins to wonder if this is not part of the regulatory process, and that SAC factored in a slight reduction in allowable emissions level with the expectation that FDEP would in fact lower the proposed standard by a relatively insignificant amount. The one exception seems to be the CO and VOC standards, where FDEP seems to have given SAC a pass. The use of SNCR to control NOx may increase CO emissions 5-15%; the 2.9 lbs/ton of clinker is in excess of what FDEP review admits is obtainable and perhaps was calculated to allow the use of SNCR to control NOx rather than the more expensive SCR.

Why are twice the allowable opacity standard permitted in areas with no control devices compared to areas with particulate control devices such as baghouses? Specifically why is truck dumping of raw materials into screening operations exempted from opacity regulation? It seems that all areas that can

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Complete Speaker Card if you wish to speak concerning this item.

Name: John Porzio
Organization: _____
#7

Complete Speaker Card if you wish to speak concerning this item.

Name: Albert Green
Organization: Self
#4

concerning this item.

Name: Debbie Arnason
Organization: Homeowner, Property Owner
#1



Complete Speaker Card if you wish to speak concerning this item.

Name: Ray Pickett
Organization: _____
#8



Complete Speaker Card if you wish to speak concerning this item.

Name: Annette Long
Organization: Save Our Summer, Inc.
#5



Complete Speaker Card if you wish to speak concerning this item.

Name: Gilbert Bernardo
Organization: Citizen
#2



Complete Speaker Card if you wish to speak concerning this item.

Name: Rob Brinson
Organization: Submarine Club
#9



Complete Speaker Card if you wish to speak concerning this item. St. Michael's

Name: Anthony Capizzano
Organization: _____
#6



Complete Speaker Card if you wish to speak concerning this item.

Name: Albert Cassore
Organization: INDIVIDUAL
#3

contribute to opacity degradation should be equipped with some form of dust control, other than inherent moisture in raw materials; this clearly is not adequate with coal, as evidenced by a recent dust explosion. Furthermore, since the new kiln will use some of the existing equipment, such as coal processing and conveying equipment, why aren't BACT standards review for this equipment required to better control opacity?

The draft permit notes "Nearly all of the particulate matter emitted after control will be much less than 10 microns in size (PM10)"; particulates in the PM 2.5-micron range are of far more serious concern with respect to human health impacts. Yet when the significant impact analysis and AAQS was performed, it seemed to be concerned only with PM10, which would not travel nearly as far as PM2.5. It also is difficult to understand why FDEP blithely accepts the US FWS guestimate that even though the PM10 impact, predicted by the CALPUFF model when used in the screening mode demonstrated an exceedance, there is no need for a full analysis. Should this not be a determination made by FDEP, or its consultant, after a fully developed CALPUFF model was undertaken? What is the point in doing a screening analysis when, even though the significant impact threshold was exceeded, a full analysis is dispensed with based upon unsupported assumptions? Again, the above modeling concerned PM10, what about PM2.5?

It seems that more recent meteorological data could have been used from locations closer than Waycross, GA and Jacksonville and might have yielded different results. For instance, why wasn't Tallahassee used? In addition, it is unclear if other factors such as relative humidity and rainfall were considered in the model runs. Additionally, why isn't SAC required to raise the stack height to GEP standards?

Averaging times for reporting the level of different pollutants seems to be based on insuring that the applicable regulatory standards were not exceeded. In most cases, the shorter the time period in which modeled emission levels are reported, the higher the concentration. For instance on page 30 there is a table that uses as little as three hours for SO₂, 24 hours for PM 10 and only annual averaging for NO_x. With respect to the FDEP consultant, another issue that deserves clarification is; who paid for and selected Enviroplan, FDEP or SAC?

Finally, as mentioned previously there are concerns with the applicant's and its parent company's safety and compliance record. In view of the above noted concerns, the Suwannee-St.Johns group of the Sierra Club urges revision of the draft permit for capacity expansion of the SAC facility near Branford, and the Ichetucknee River. This river, the most pristine in Florida, as well as the local residents deserve better protection of public health and our natural resources. While this proposed expansion may be an improvement over the existing facility and other similar ones, certainly, they are an improvement over older cement kilns; there still exists numerous concerns of impacts to human health and the environment. SAC appears to be a profitable company; they deserve to give the community the best technology and controls possible. Thank you for your attention to this matter.

Sincerely,

Rob Brinkman, Chair

Public Comment - Debbie Arnason + *ARNE ARNASON*

PO Box 886, Ft. White, FL 32038 386-497-3830 DiamondtelDeb@aol.com (but call to confirm)

January 31, 2006

Jeff Koerner, BAR - Air Permitting North, FL DEP
850-921-9536

RE: PUBLIC MEETING ON DRAFT PERMIT FOR SUWANNEE AMERICAN CEMENT, Branford Plant, New Cement Production Line **KILN#2**, Project No. 1210465-014-AC 6PM-8PM Tues, Jan 31, 06 Hatch Park Community Ctr, 403 Craven St, Branford, Suwannee County, FL re: **PREVENTION OF SIGNIFICANT DETERIORATION (PSD) OF AIR QUALITY** pursuant to **RULE 62-212.400, FAC**

Dear Representatives of the FL DEP and accordingly, the People of North Florida:

My husband and I relocated to this area about 6 months ago and own a home and several properties in Suwannee (Branford) and Columbia Counties.

Having had mercury poisoning myself and my husband recovered from lung cancer but with some residual asthma, we were understandably upset to learn that we are very close to two cement plants with plans to expand as well as several coal-fired energy plants. While some pollution is expected under the circumstances, the **CUMULATIVE EFFECT** will far exceed even 'allowable' limits. At the same time, our present Government seems to be less and less inclined to monitor or prosecute their own regulations, so we locals are at your mercy.

Please review my attached letters and articles concerning the hazards of mercury and other emissions from cement plant kilns which may act as **UNREGULATED INCINERATORS** to burn such pollutants as rubber tires and hazardous waste. But no matter what they burn to maintain their high heat, people are being poisoned by **ANY LEVEL OF MERCURY**.

I have noticed very few birds in this area, which was proven to be the case in Everglades until they got rid of the mercury in the environment. This is being studied also at Univ. of FL in Gainesville at the present time. (see newspaper article, "Mercury," Gainesville Sun 12/10/05). I have myself been experiencing numbness and tingling in my hands, anxiety, 'brain fog' and rashes which are all symptoms of mercury toxicity I dealt with in the past. Additionally, my husband was rushed to the ER with an asthma attack and the doc asked him, "What are you doing in the Asthma Capital?"

Please, as fellow human beings, do not allow this permit and encourage (or better yet, enforce) SAC to find ways to reduce or eliminate the mercury and other pollutants at the existing plant. To hear it said that **new methods are 'prohibitively expensive'** is a poor joke when it comes to the lives and health of the good people in this area.

Sincerely,


Deb Arnason



CC: Dr. Tom Atkeson, Mercury Coordinator - wrote 4/28/05 about potential problems here
EPA FL Dept MS 6540, 2600 Blairstone Rd.
Tallahassee, FL 32399 850-245-8305/fx8303

Go on line at www.nrde.org:8000/mercury/data.asp?tnapsrvprv=mercury_48&mode to look at Florida's data from Natural Resources Defense Council on mercury

* Susan Glickman @ Verizon.net of Natural Resources Defense Council
Rob Brinkman @ Cox.net of Sierra Club
Have alternatives to tell you about! Please call them!

From the Desk of Debbie Arnason

PO Box 886, 704 SW Longhorn Terr, Ft. White, FL 32038 386-497-3830

~~**~~ Cement Plant

January 6, 2006

Clay Electric Cooperative
1910 SW Main Blvd.

Lake City, FL 32025 386-752-7447

ATTN: Bill Phillips

Dear Bill:

I really enjoyed our phone conversation today and appreciate you taking the time to consider my concerns about the coal-fired energy plants.

To review several things we discussed, there was an author, Barbara Frieze (Freeze?), on National Public Radio, TOTN@NPR.org, 1/5/06, discussing her book, 'Big Coal, Dirty Secrets,' also an article in the NY Times, 'Black Gold or Black Death.' Perhaps a review by members of the Board together with the contacts in my previous letter would help to convince them of the need to do more to clean up mercury and CO2.

Another talking point would be that Gainesville Regional Utilities made the front page of the Gainesville Sun today, "\$100 million power plant cleanup wins Gainesville OK," stating, "The project will lower levels of certain pollutants that impair air quality and harm human health. MERCURY, a neurotoxin that impairs brain development...nitrogen oxides...ozone...sulfur dioxide...will be reduced 90%...A lime and water mixture will be sprayed on emissions causing a reaction that removes sulfur dioxide and mercury." (Plus, Bruce Alfee of Technomics, Stuart, FL 800-369-8381 or Gary Madden 772-486-1610, manufacture a separator that removes the mercury from rock before it is burned.)

**
Could be used for cement plant?

It seems GRU offers those who want their energy from 'green' sources that alternative as well for \$.10 per KWH which a friend of mine in Gainesville is happy to pay. If we would also look into coal gasification for the CO2 (global warming), coal might be an acceptable energy source in moderation while utilizing as much 'green' technology as possible. With the accident in the WVA mines and the desecration of TN mountains by blasting, we must reconsider total reliance on temporarily 'cheap' coal.

As discussed, I'd love a poll of our customers to see how many now would be willing to pay more for clean energy. However, I am leary of hired pollsters with hidden agendas. 3000 of us in Naples Park, FL were almost 'polled' into accepting \$10,000-\$20,000 per lot renovations of our community. They were hired by our developer-friendly County Commissioners: The way the poll was worded, if someone said "yes" to just sidewalks at \$500 per residence, it would be recorded as a "yes" to the whole project. Fortunately, some of got wise and spread the word to defeat the plan.

Once again, thanks for your consideration of the health and well-being of all concerned.
Sincerely, *Deb* Deb Arnason Customer #596324-4

cc: Board of Trustees, Keystone Heights
✓ cc: Seminole Electric, Tampa plus 2 other letters

Wlar emailed 12/20 See Sent email Hilda + Colbert / Tingling + mercury

*BRANFORD CEMENT PLANTS

From the Desk of Debbie Arnason

PO Box 886, 704 SW Longhorn Terr, Ft. White, FL 32038 386-497-3830

Bill Phillips, Manager + BOARD OF TRUSTEES, KEYSTONE HEIGHTS 32656 POB 308
Harry Barrow, Chairman Clay Development Authority
Clay Electric Cooperative
1910 SW Main Blvd.
Lake City, FL 32025
386-752-7447

December 25, 2005

RE: No New Coal-Fired Energy Plants (Mercury & CO2 polluters!)

Dear Bill and Harry:

I am very unhappy about the 3 new 750 megawatt coal-fired generating units planned. I attended the Public Scoping Meeting in Palatka and learned that despite some pollution controls, THERE ARE NO CONTROLS WHATSOEVER ON TOXIC MERCURY AND GLOBAL-WARMING CARBON DIOXIDE EMISSIONS! This cannot be acceptable to you or anyone if they are aware of the hazards. I hope you will take a few minutes to look up the many illnesses and ponder the horrendous effects of these pollutants on our environment.

Meanwhile, watch the movie, "Kilowatt Ours", for practical alternatives. Contact Rob Brinkman 352-318-4934 of Sierra Club and SusanGlickman@Verizon.net 727-595-7314 of Natural Resources Defense Council. They will be happy to direct you to information about other resources than Coal-fired Energy Plants which still fail to address the urgent issues of Mercury and CO2 pollution such the ones planned by Seminole Electric.

The EPA under the current Administration has gone crazy allowing much more of these toxics into the environment than is necessary just to patronize polluting corporations who pay them big bucks. I hope and pray my own cooperative electric company does not fall prey to this insanity just to save a few dollars. By the time these monstrosities are built, they will be obsolete or outlawed, or we will all be too sick to care. What kind of savings is that?

Additionally, you need to know that Newberry and Branford are doubling the size of their existing cement plants which produce tons of mercury to add to the existing burden. I love my new home here, but having had mercury poisoning and my husband having recovered from lung cancer, we would be unable to stay. You and your families are at grave risk also. Please reconsider.

Sincerely,

Deb Arnason Customer #596324-4

*P.S. Numbness and tingling as well as "branfog" are common symptoms of mercury in the air.

This message has been scanned for known viruses.

From: DiamondtelDeb
To: stephanie.strength@usda.gov
Cc: susanglickman@verizon.net, action@earthjustice.org, Publisher@TownsquareNews.com, news@highspringsherald.com, aolfriends@earth.care2.com
Bcc: JohnEagle2
Subject: Fwd: Public Comment: No New Coal-Fired Energy Plants in Seminole
Date: Mon, 07 Nov 2005 15:07:16 -0500

UPDATE: 11/7/05: Stephanie, I just learned of a possible second coal plant in Gainesville, FL and another in Perry, Taylor County, FL both less than 50 miles from where I live (and breathe). To top it off, the one in Perry will not even benefit locals...all energy generated will supply Disney World, Jacksonville and possibly a small portion of Tallahassee. We will, however, reap the pollution in the Gainesville, Alachua, High Springs, Ft. White, Branford, etc. area. Please think how you would feel if this was in your backyard affecting your parents and children, then carry our message accordingly. Thank you!!

Deb Arnason, POB 886, Ft. White, FL 32038 386-497-3830. (corrected POBox)

-----Original Message-----

From: DiamondtelDeb
To: stephanie.strength@usda.gov
Cc: Publisher@TownsquareNews.com; voice@gvillesun.com; susanglickman@verizon.net; action@earthjustice.org; aolfriends@earth.care2.com
Sent: Fri, 04 Nov 2005 14:46:11 -0500
Subject: Public Comment: No New Coal-Fired Energy Plants in Seminole

Stephanie Strength EPA Specialist USDA/Rural Development/Utilities Program, 1400 Independence Ave SW STop 1571, Washington DC 20250 202-720-0468

This is my response to the Public Scoping Meeting on Seminole Unit 3 Project for 2 new Coal Fired Energy Plants in the Northeast Florida region. I attended the meeting on Oct. 10, 2005 which I only learned about inadvertently. It was poorly advertised.

After talking to the very nice people from Seminole and carefully reviewing the Draft Plan of Study, I must say a flat "NO" to these new plants. Although they do employ some new technology which is helpful, they fail because they do nothing to address CO2 emissions which are known to contribute to global warming and thus the increase of hurricanes we have been experiencing here in Florida. Carbon emissions also contribute to the ever-increasing cases of asthma in this area. In fact, we recently relocated here and my husband was taken to the E.R. in Gainesville with an asthma attack and arrythmia. The ER Doc said, "What are you doing in the Asthma Capital?" I know of many people in this area with similar problems. It is unthinkable to add to their woes.

Additionally, these new plants do not adequately address the mercury issue which is being ignored by this Administration. Mercury is toxic and especially dangerous to children. No more can be tolerated in our environment.

Please look for better alternatives such as solar, wind, IGCC (carbon sequestration) and separator rings to remove many pollutants such as mercury BEFORE burning.

Our lives are at stake, especially in the surrounding areas!! THE USDA can do no less than refuse to put these plants into operation.

Sincerely,

Deb Arnason / Deb ARNASON

P.S. Numbness + Tingling are signs of nerve damage from mercury,

From: DiamondTelDeb @ AOL.com
To: letters@tallahassee.com
Bcc: Publisher@TownsquareNews.com, jbauerregs1948@earthlink.net, jaworden@prodigy.net, Minimushomines, johnvoell@yahoo.com, csteppi@yahoo.com [Show 8 more](#)
Subject: Canary in (Florida) Coal Mine
Date: Tue, 15 Nov 2005 16:08:04 -0500

To: Letters@Tallahassee.com/ <http://www.tallahassee.com/mid/tallahassee/news/editorial/letters/11/15/05>

Dear Editor:

My husband and I recently relocated to NE Florida from Naples in the hopes of getting away from hurricanes, red tide, traffic fumes, golf course and lawn chemicals. I'm afraid we've gone "out of the frying pan into the (coal) fire" with our new utility company threatening to install 2 coal-fired energy plants releasing toxic mercury and carbon dioxide into the air.

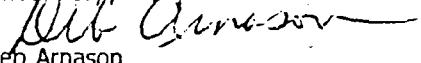
Both of us have health issues, my husband recovered over 5 years from lung cancer and I am plagued with chemical allergies. We thought it would be better to move to this nice rural area by the clean (looking) Santa Fe River. After several months of living in a trailer on our property, we are almost ready to move into our new house, but feel under attack. It seems we are in the 'kill zone' for environmental WMD's in the form of 4 new planned coal energy plants, at least 2 existing ones, plus several expanding cement facilities ranging from Newberry to Crystal River to Perry to Branford to Palatka to Gainesville. No matter which way the wind blows, WE LOSE.

Ironically, a doctor once told me "You're like the canary in the coal mine" with my environmental sensitivities. My reactions to mercury alone are numbness and tingling of hands and feet, dryness of mouth, nose and eyes, vision disturbances, inability to concentrate, sleeplessness and fatigue, brain fog, memory loss and, of course, depression. Others may be experiencing similar symptoms without knowing the cause.

My husband experienced an asthma attack last month. The Emergency Room doctor in Gainesville asked him, "What are you doing in the Asthma Capital?" and related his own breathing problems living here. On 441 we notice the air by the local GRU coal-fired utility is thick enough to cut with a knife and wonder how they could be considering a second facility in Alachua County.

I sure hope someone can protect us. I've tried the EPA which turns a deaf ear. It appears our Government cares more about Corporate Welfare than defending the health and well-being of its Citizens. I did get support from some environmental groups, but I am asking anyone in this area who cares about clean air and water to call your Senators (US/202-225-3121 & FL/800-347-1827) and Representatives (US/202-224-3121 & FL/850-488-1157) to let them know we are under attack! *by corporate polluters.*

Sincerely,


Deb Arnason
PO Box 886, Ft. White, FL 32038
386-497-3830

the Suwannee River, which feeds into the Santa Fe River before that waterway connects to the Suwannee River.

"Depending on which way the wind blows, any of them could be affected," she said.

State environmental officials say technology to reduce mercury emissions would be prohibitively expensive and they believe the plant already produces low levels of pollution. The company has proven that initial fears it would violate environment regulations to be unjustified, said Al Linero, program administrator for the state Department of Environmental Protection's Bureau of Air Regulation, which approved the draft permit.

He said a consent order between the state and company was the result of kinks in the plant's first early stages of operation. The department fined the company nearly \$205,000 last year for releasing more sulfur dioxide, nitrogen oxide and total hydrocarbons than allowed by the plant's permit, and other violations.

This summer, the department investigated maintenance problems in the plant's stormwater ponds. The investigation found stormwater was allowed to drain past raw materials, including ash and iron ore, and a sinkhole wasn't properly reported, according to a letter from the department.

The department inspected the property Friday and found all problems had been fixed, according to a department spokeswoman.

Eighty workers are employed at the plant, and the expansion would create another 30 jobs, he said. While Lake City-based Anderson Columbia built the plant, Brazilian conglomerate Votorantim Cimentos purchased a 50 percent stake and now runs the facility. The plant produces 1 million tons of cement a year and the more than \$150 million expansion would double that production.

The project, along with the expansion of the Florida Rock plant, reflect a growth in the cement industry in part fueled by Florida's increasing population. The industry's growth comes as environmental groups continue fighting the federal government over the lack of oversight on those plants.

The Sierra Club and Earthjustice sued the U.S. Environmental Protection Agency in 2000 for not following the Clean Air Act by leaving kilns out of its regulations. Twice in the past five years an appeals court judge has ordered the agency to write new rules that included mercury and other pollutants. But the agency last month proposed another rule without limits on mercury.

The agency found that technology to reduce mercury was prohibitively expensive, said agency spokesman John Millet.

"If in the future technology becomes available that makes it feasible to contain mercury on those plants, then we would revise it," he said.

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Gainesville, Florida, Vol. 130, No. 157, five sections 50¢

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Mercury concerns grow with plant size

■ Branford's cement plant growth would make it the biggest source of mercury pollution in the region.

By NATHAN CRABBE

Sun staff writer

Suwannee American Cement's cement plant in Branford caused years of contentious debate before the state approved the project.

But the company's proposal to double the plant's size just two years after it opened — and in the process become the region's biggest source of mercury pollution — has received initial state approval with nary a peep of criticism.

"Some people have either forgotten about the plant or aren't aware it's operating... because of the minimal impact that it's had," said Joe Horton, the plant's environmental manager.

The state Department of Environmental Protection approved a draft permit for the expansion last month and Suwannee County commissioners are expected to consider the project early next year. Some clean-water advocates say they haven't fought the expansion because there's little they can do to stop it.

They point to federal environmental regulations that

CEMENT on Page 5A

HOW TO COMMENT

Public comment is open until Dec. 16 on the Florida Department of Environmental Protection's draft permit for Suwannee American Cement's expansion in Branford. To date, no comments have been received. Comments can be mailed to Jeff Koerner, manager of air permitting north section, 2600 Blair Stone Road, Mail Station 5505, Tallahassee, FL 32399.

Public comment is open until Jan. 17 on the U.S. Environmental Protection Agency's proposed rule that regulates emissions from cement kilns, but doesn't include mercury. Comments should be identified by Docket ID No. OAR-2002-0051 and can be e-mailed to a-and-r-docket@epa.gov or mailed to EPA Docket Center, Environmental Protection Agency, Mailcode 6102T, 1200 Pennsylvania

ills ds

ing Old Orchard, up to 7 inches of r fall in the early r Sanford, Maine, ches of snow, binton, N.H., ly 16 inches. airly widespread

When you stay on the
Photo for Seminar!

Week on the Train?

BEST AVAILABLE COPY

What about overlays??

CEMENT: Cement, power plants biggest mercury sources here

Continued from 1A

allow cement plants to spew limitless amounts of mercury, despite an ongoing lawsuit saying those rules violate the Clean Air Act.

"We're actually going backwards," said Annette Long, president of Save Our Suwannee, a longtime critic of the plant.

She pointed to a list of projects that would dramatically increase mercury emissions in the next decade.

Newberry's City Commission approved the doubling of Florida Rock Industries' cement plant there last month, while Gainesville Regional Utilities and a handful of other regional utilities are proposing new coal-burning power plants in the years ahead.

Cement and power plants are the biggest local sources of mercury, a neurotoxin that can damage the growing brains of fetuses and children. Most Florida seafood has low to medium levels of mercury and should be eaten sparingly by pregnant women and children, according to the state health department. The contaminant has also been shown to have reproductive effects on wading birds and other wildlife.

Mercury and other pollutants from Suwannee American's plant are of particular concern, Long said, because of its proximity to three rivers. The plant is located off U.S. 27 within four miles of the crystalline Ichetucknee River, which feeds into the Santa Fe River before

The state of Florida is the only entity regulating those emissions and does so on a case-by-case basis.

Suwannee American's expanded plant would be permitted by the state to emit 214.5 pounds of mercury a year. About 141 pounds of mercury would actually be present in the coal and limestone fed into the kiln and less would be emitted, Horton said.

Officials at Florida Rock say its expanded cement plant in Newberry would emit 65 pounds a year. GRU's existing coal-burning power plant emitted 71 pounds of mercury in the most recent year of data, but improvement in technology mean both that facility and the utility's proposed new plant would emit 20 total pounds when work is complete.

Horton said the mercury

emitted by the Suwannee plant is in an inorganic form that isn't a health threat. But researchers have found that mercury that goes into the atmosphere in that form returns through rain into wetlands or the beds of waterways, where it is converted by bacteria to its dangerous organic form.

While mercury pollution was previously thought to be more,

of a global or regional problem, researchers in recent years have found that local mercury sources can impact the surrounding area. In the Everglades, reductions in mercury pollution at waste incinerators were found to have caused wading bird populations to rebound in the early 1990s.

University of Florida researcher Peter Frederick is now studying that relationship

by feeding mercury-dosed food to white ibises in a Gainesville aviary. He said Florida's wet and hot conditions are perfect for turning mercury into the organic form.

Mercury in that form can accumulate in wildlife, making fish dangerous for human consumption.

"However it's getting there, whatever process it is, we're now at risk," he said.

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everyone has a gift to give

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SAC

Anthony Cirigliano

Additional Comments on
proposed out put.

Based on 1,055,500 Tons of Clinker

Based on Published Emissions.

Carbon monoxide 3,060,950^(LBS) of CO Carbon monoxide
.290 LBS per ton of clinker

Nitrogen oxide 2,058,225^(LBS) NOx Nitrates
.95 LBS per ton of clinker

Sulfur dioxide 211,100 LBS of SO₂
.20 LBS per ton of clinker

PM 10 105550 LBS. PM10
.10 LBS per Ton clinker

~~NO_x~~
VOC 125,000 LBS VOC
.12 per ton clinker

proposed
117 LBS of mg 95 LB Exceeds 200 LBS per year

Need to do more extensive monitoring of the
existing plant.

Sent to Smurco Electric Body Div.

w/ letters to Bill Phillips at Clay Electric +

Stephanie at US.

www.onearth.org

Susan Glickman @ Verizon.net

Fieldwork



Clearing the Air

Meet the team that helps keep our nation's Clean Air Act safe from harm

For the past five years, a relentless assault has been waged on one of this country's most significant pillars of environmental protection: the Clean Air Act, passed in 1970. Rule after rule has been promulgated with the intent of eviscerating the substance of the act. NRDC has recruited a trio of experts who know the law and the inner workings of the Environmental Protection Agency and given them the resources they need to preserve this critical safeguard of our air and health.

John Walke, director, clean air program

ORIGINS: "I grew up in Aiken, South Carolina, where my dad worked for DuPont at the U.S. Department of Energy's Savannah River site—they made plutonium and tritium for weapons," Walke says. "Everyone I knew worked there." As it turns out, the Savannah site was the locus of many NRDC battles in the 1970s over radioactive waste disposal, and still is today.

EARLY CAREER: Walke graduated from Harvard Law School in 1993 and went to work for a private law firm that represented various industries, an experience he believes has been invaluable to his work at NRDC. "It allowed me to understand how companies think," he says. "I know how their lawyers litigate." He then worked for the EPA in the office of the general counsel, the agency's internal law firm.

THE WORK: As director of the clean air program, Walke makes decisions about which battles—lawsuits, congressional debates, regulatory issues—NRDC will join. "The beauty of our effort is that it's full-service: media advocacy, lobbying, litigation," he says. "We know what the EPA is going to do and when they're going to do it. There are lots of people at the EPA who deplore what's happening to the agency and to our environment," Walke says. "They know that I'm someone they can trust to voice their concerns."

David McIntosh, litigator

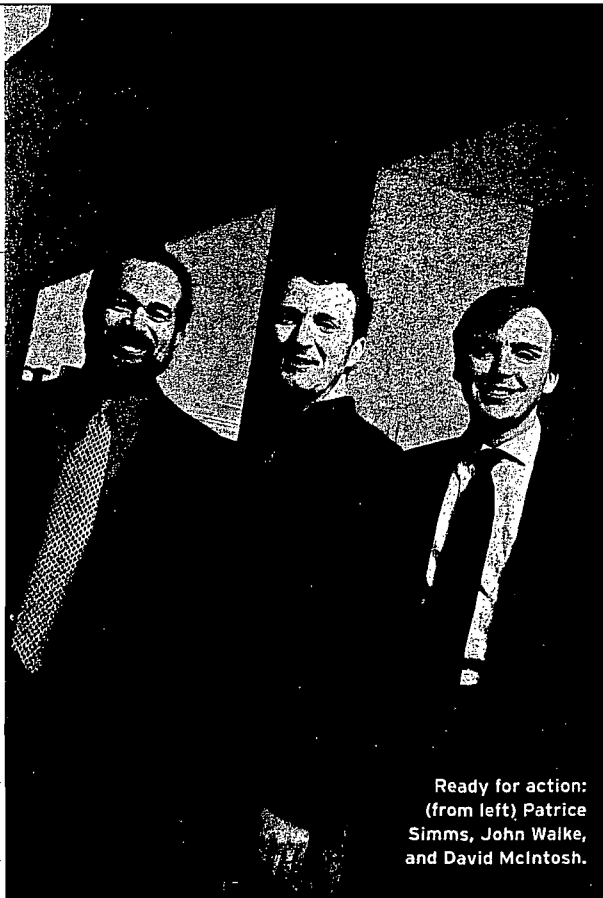
ORIGINS: "I was born in Pittsburgh, where my mom's family was in the steel business," McIntosh says. "My grandfather carried a clean shirt to work every day because the one he was wearing would be filthy by midday. But my interest in pollution issues didn't really emerge until I was in tenth grade, when I took an environmental studies course."

THE WORK: McIntosh is the air team's legal bulldog, writing and filing briefs and arguing cases in court. "Our job is to watch the EPA's implementation of the Clean Air Act like a hawk," he says. "If they change industry regulations in a way that undermines the act, we sue. If they fail to enforce some portion of it, we shine a spotlight on their failure."

RESULTS: In 2003, NRDC convinced a U.S. appeals court to block the EPA's "new source review" rule. The rule would have made it possible for power plants to upgrade their equipment without also upgrading their pollution controls. But the fight goes on: Since then, the EPA has continued to hack away at the new source review provisions of the act.

Patrice Simms, attorney, coal initiative

ORIGINS: "My parents had enough of city life by the time I was five years old," says Simms, who grew up in Maine, hiking, boating, and reveling in the rugged splendor of the coastline. He packed off to college and law school with a general interest in public policy, and was drawn to environmental issues as a summer associate at a law firm in Seattle, where he assessed the impact of a proposed logging project on wildlife habitat.



Ready for action: (from left) Patrice Simms, John Walke, and David McIntosh.

BACKGROUND: Like John Walke, Simms worked in the EPA's office of the general counsel, where he focused on vehicle, power plant, and factory emissions. He went on to review permitting decisions for power plants at the agency, a job that taught him about the technical specifications of these plants as well as the ins and outs of the laws that govern their permitting and construction.

THE WORK: More than 125 coal-fired power plants are slated for construction in this country. "Building just a fraction of them would swamp any effort to curb U.S. global warming emissions," Simms says. Last fall, he was one of several advocates to meet with officials in St. Lucie County, Florida, where a coal-fired plant had been proposed. Mercury emissions would pose an immediate threat to public health in the coastal community, he explained, and global warming pollution would harm not just Floridians, but everyone. The county officials listened and voted down the proposal.

PHOTOGRAPH FOR ONEARTH BY ORANE SOREY

Yes!

When you stay on the tracks ignoring the facts.... well, you can't blame the wreck on the train!
 Photo for Seminars

CEMENT: Cement, power plants biggest mercury sources here

Continued from 1A

allow cement plants to spew limitless amounts of mercury, despite an ongoing lawsuit saying those rules violate the Clean Air Act.

"We're actually going backwards," said Annette Long, president of Save Our Suwannee, a longtime critic of the plant.

She pointed to a list of projects that would dramatically increase mercury emissions in the next decade.

Newberry's City Commission approved the doubling of Florida Rock Industries' cement plant there last month, while Gainesville Regional Utilities and a handful of other regional utilities are proposing new coal-burning power plants in the years ahead.

Cement and power plants are the biggest local sources of mercury, a neurotoxin that can damage the growing brains of fetuses and children. Most Florida seafood has low to medium levels of mercury and should be eaten sparingly by pregnant women and children, according to the state health department. The contaminant has also been shown to have reproductive effects on wading birds and other wildlife.

Mercury and other pollutants from Suwannee American's plant are of particular concern, Long said, because of its proximity to three rivers. The plant is located off U.S. 27 within

The state of Florida is the only entity regulating those emissions and does so on a case-by-case basis.

Suwannee American's expanded plant would be permitted by the state to emit 214.5 pounds of mercury a year. About 141 pounds of mercury would actually be present in the coal and limestone fed into the kiln and less would be emitted, Horton said.

Officials at Florida Rock say its expanded cement plant in Newberry would emit 65 pounds a year. GRU's existing coal-burning power plant emitted 71 pounds of mercury in the most recent year of data, but improvement in technology mean both that facility and the utility's proposed new plant would emit 20 total pounds when work is complete.

Horton said the mercury

emitted by the Suwannee plant is in an inorganic form that isn't a health threat. But researchers have found that mercury that goes into the atmosphere in that form returns through rain into wetlands or the beds of waterways where it is converted by bacteria to its dangerous organic form.

While mercury pollution was previously thought to be more

of a global or regional problem, researchers in recent years have found that local mercury sources can impact the surrounding area. In the Everglades, reductions in mercury pollution at waste incinerators were found to have caused wading bird populations to rebound in the early 1990s.

University of Florida researcher Peter Frederick is now studying that relationship

by feeding mercury-dosed food to white ibises in a Gainesville aviary. He said Florida's wet and hot conditions are perfect for turning mercury into the organic form.

Mercury in that form can accumulate in wildlife, making fish dangerous for human consumption.

"However it's getting there, whatever process it is, we're now at risk," he said.

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mercury and other pollutants from Suwannee American's plant are of particular concern, Long said, because of its proximity to three rivers. The plant is located off U.S. 27 within four miles of the crystalline Ichetucknee River, which feeds into the Santa Fe River before that waterway connects to the Suwannee River.

"Depending on which way the wind blows, any of them could be affected," she said.

State environmental officials say technology to reduce mercury emissions would be prohibitively expensive and they believe the plant already produces low levels of pollution. The company has proven that initial fears it would violate environment regulations to be unjustified, said Al Linero, program administrator for the state Department of Environmental Protection's Bureau of Air Regulation, which approved the draft permit.

He said a consent order between the state and company was the result of kinks in the plant's first early stages of operation. The department fined the company nearly \$205,000 last year for releasing more sulfur dioxide, nitrogen oxide and total hydrocarbons than allowed by the plant's permit, and other violations.

This summer, the department investigated maintenance problems in the plant's stormwater ponds. The investigation found stormwater was allowed to drain past raw materials, including ash and iron ore, and a sinkhole wasn't properly reported, according to a letter from the department.

The department inspected the property Friday and found all problems had been fixed, according to a department spokeswoman.

Eighty workers are employed at the plant, and the expansion would create another 30 jobs, he said. While Lake City-based Anderson Columbia built the plant, Brazilian conglomerate Votorantim Cimentos purchased a 50 percent stake and now runs the facility. The plant produces 1 million tons of cement a year and the more than \$150 million expansion would double that production.

The project, along with the expansion of the Florida Rock plant, reflect a growth in the cement industry in part fueled by Florida's increasing population. The industry's growth comes as environmental groups continue fighting the federal government over the lack of oversight on those plants.

The Sierra Club and Earthjustice sued the U.S. Environmental Protection Agency in 2000 for not following the Clean Air Act by leaving kilns out of its regulations. Twice in the past five years an appeals court judge has ordered the agency to write new rules that included mercury and other pollutants. But the agency last month proposed another rule without limits on mercury.

The agency found that technology to reduce mercury was prohibitively expensive, said agency spokesman John Miller.

"If in the future technology becomes available that makes it feasible to contain mercury on those plants, then we would revise it," he said.



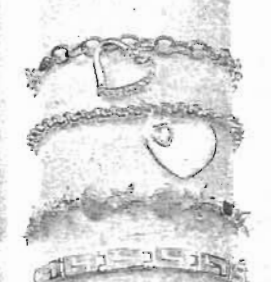
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How can they?

~~Signature~~ SIGN IN LIST

Public Meeting - January 31, 2006
Suwannee American Cement - Expansion Project
Project No. 1210456-014-AC (PSD-FL-352) - Proposed 2nd Kiln System

1. Barbara McCoy
2. David H. McCoy
3. Dick Bryant
4. Debbie ARNASON
5. ARUE ARNASON
6. Robert - Sweeney Cassel 388-935-0185 654K Road
7. Gilbert Bernaldo
8. Al Greene
9. Sarah Greene
10. Annette Long - Saw Oak Suwannee, Inc.
11. Tony Cirigliano
12. Don + Annmarie Brennan
13. Joe Hoerog
14. Nathan Crabbe
15. John PERRIN
16. Lyle BARNARD SAW OAK SUWANNEE, Inc
17. Daniel Walford
18. George & Kay Reynolds
19. ALVIN HARRIS
20. Jimmy E Pedgett
21. Edith Pickett
22. Ray Pickett
23. Celeste Rubanick
24. Rob Brinkman chair Suwannee-St. Johns Sierra Club
- 25.
- 26.
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- 31.
- 32.

Speaker List

Public Meeting - January 31, 2006

Suwannee American Cement - Expansion Project

Project No. 1210456-014-AC (PSD-FL-352) - Proposed 2nd Kiln System

1. Debbie ARNASON + ARNE ARNASON
2. Gilbert Bernardo
3. ROBERT CASSUBE
4. Albert Greene
5. Annette Long - Save Our Suwannee Inc.
6. Anthony C. Williams
7. John Perrino
8. Ray Pickett
9. Rob Brinkman Suwannee-St. Johns Sierra Club
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Public Comment - Debbie Arnason

PO Box 886, Ft. White, FL 32038 386-497-3830 DiamondtelDeb@aol.com (but call to confirm)

January 31, 2006

Jeff Koerner, BAR - Air Permitting North, FL DEP
850-921-9536

RE: PUBLIC MEETING ON DRAFT PERMIT FOR SUWANNEE AMERICAN CEMENT, Branford Plant, New Cement Production Line **KILN#2**, Project No 1210465-014-AC **6PM-8PM Tues, Jan 31, 06** Hatch Park Community Ctr, 403 Craven St, **Branford**, Suwannee County, FL re: **PREVENTION OF SIGNIFICANT DETERIORATION (PSD) OF AIR QUALITY** pursuant to **RULE 62-212.400, EAC**

Dear Representatives of the FL DEP and accordingly, the People of North Florida:

My husband and I relocated to this area about 6 months ago and own a home and several properties in Suwannee (Branford) and Columbia Counties.

Having had mercury poisoning myself, and my husband recovered from lung cancer but with some residual asthma, we were understandably upset to learn that we are very close to two cement plants with plans to expand as well as several coal-fired energy plants. While some pollution is expected under the circumstances, the **CUMULATIVE EFFECT** will far exceed even 'allowable' limits. At the same time, our present Government seems to be less and less inclined to monitor or prosecute their own regulations, so we locals are at your mercy.

Please review my attached letters and articles concerning the hazards of mercury and other emissions from cement plant **kilns** which may act as **UNREGULATED INCINERATORS** to burn such pollutants as rubber tires and hazardous waste. But no matter what they burn to maintain their high heat, people are being poisoned by **ANY LEVEL OF MERCURY**.

I have noticed very few birds in this area, which was proven to be the case in Everglades until they got rid of the mercury in the environment. This is being studied also at Univ. of FL in Gainesville at the present time (see newspaper article, "Mercury... "Gainesville Sun 12/10/05). I have myself been experiencing numbness and tingling in my hands, anxiety, 'brain fog' and rashes which are all symptoms of mercury toxicity I dealt with in the past. Additionally, my husband was rushed to the ER with an asthma attack and the doc asked him, "What are you doing in the Asthma Capital."

Please, as fellow human beings, do not allow this permit and encourage (or better yet, enforce) SAC to find ways to reduce or eliminate the mercury and other pollutants at the existing plant. To hear it said that **new methods are 'prohibitively expensive'** is a poor joke when it comes to the lives and health of the good people in this area.

Sincerely,

Deb Arnason

CC: Dr. Tom Atkeson, Mercury Coordinator - wrote 4/28/05 about potential problems here
EPA FL Dept MS 6540, 2600 Blairstone Rd.
Tallahassee, FL 32399 850-245-8305/fx8303

- Go on line at www.nrdc.org:8000/mercury/data.asp?inapsrvprv=mercury_48&mode to look at Florida's data from Natural Resources Defense Council on mercury

Written Comment Form

Public Meeting - January 31, 2006

Suwannee American Cement - Expansion Project

Project No. 1210456-014-AC (PSD-FL-352) - Proposed 2nd Kiln System

Name: Dick Bryant
Address: 25852 83rd Rd BIRANFORD - FL 32008
Phone Number: 386 935-1577
Email: RMB5033@hotmail.com

I have the following comments with regard to the proposed draft permit determination for the above referenced project:

I believe that the cement plant should

(1) include standards, not printed, equipment operators and other self-governed on the self-regulation department of the plant.

Self regulation is very important.

Written Comment Form

Public Meeting - January 31, 2006

Suwannee American Cement - Expansion Project

Project No. 1210456-014-AC (PSD-FL-352) - Proposed 2nd Kiln System

Name: Celeste Rubanick
Address: 20727 NW 78 Ave, Alachua, FL 32615
Phone Number: ~~386-418-2275~~ 386-418-2275
Email: Podie1956@aol.com

I have the following comments with regard to the proposed draft permit determination for the above referenced project:

I know I am wasting my time. I know that money talks and little people like me don't count. But I also know I wouldn't be able to look at myself in the mirror if I didn't at least voice how I feel.

"Pristine" is an overused word, but the Ichetucknee River is truly pristine. I don't know how anyone who has canoed or kayaked the river wouldn't want to save it. The plant will be allowed to emit 117.5 lbs of mercury per year. Who doesn't know that mercury is dangerous? We're supposed to limit our consumption of fish due to mercury in them, so it's obvious the fish will absorb it here, as well.

I live less than two miles from Florida Rock in Newberry and I already experience effects from that plant. I can see a glass of liquid vibrate when Florida Rock is running. I hear a loud humming noise. My husband and I have had to buy air cleaners for each room to avoid headaches. These headaches started when we moved to our current residence.

There's no sense in going on. This #2 kiln will be built and used and we will all suffer. No one cares. Only money matters.

Written Comment Form

Public Meeting - January 31, 2006

Suwannee American Cement - Expansion Project

Project No. 1210456-014-AC (PSD-FL-352) - Proposed 2nd Kiln System

Name: ALVIN HARRIS

Address: 26087 CR 137 D'BRIEN FL 32071

Phone Number: 386/935-3514

Email: HARRIS DGR @ PEOPLE PC . COM

I have the following comments with regard to the proposed draft permit determination for the above referenced project:

Question: what contaminants does EPA monitor for?

Question: what frequency?

Comment: prevailing winds are from the west.
I live on CR 137 1/2 mile N. of US 29 and
approx 2 1/4 miles E of cement plant.

January 31, 2006

By Anthony Cirigliano, 876 SW Newark Dr., Ft. White Florida, 32038 386-364-2199,
for inclusion in the public record of a public meeting conducted by the State of Florida
Department of Environmental Protection for Suwannee American Cement Plant, Branford
Cement Plant, New Cement Production Line #2
Project No. 1210465-014-AC

I challenge the accuracy of air permit allowance requests and the proposed clinker out-put identified in the published public notice as recorded in the Suwannee Democrat /Live Oak newspaper on Wednesday November 16,2005 of an additional 1,055,500 tons of out-put per annual year. And I request that the Department **NOT GRANT Any Permits** for a 2nd line of production at the Suwannee American Cement Kiln (Factory in Branford) The existing plant has operated for less than 2 years and existing production and environmental pollution facts have not be verified. It is far to early to allow for further production of a 2nd line before effects of the existing plant are statically confirmed and field verified. I request that the Department enforce more stringent compliance requirements on the existing plant and deny the proposed 2nd production line in its entirety.

TRANSPORTATION & ENVIRONMENTAL ISSUES:

This capacity would create the following additional truck traffic if reached:

30 ton per trip analysis:(allows for normal truck capacity26 tons plus 15% more than suggested)
1,055,500 tons per line 2 alone proposed / 30 tons of capacity per truck capacity = 35,183
truck trips out alone, A doubling of these number of trips would be needed in order for trucks
to return to the plant 35,183 trips x 2 = 70,366 truck trips for line 2 alone

70,366 trips / = 8,760 (365 days x 24 hours a day) working hours available per year , equates
to 8.03 truck trips per hour, equaling a truck in or out once every 7.47 minutes solely for the
additional capacity proposed by line 2.

This analysis does not include the number of trips needed to enter and exit the plant for
supplies, nor energy fuel proposed as coal. This analysis also does not include the truck trips
needed to run the existing plant for energy (coal), raw materials and additives ,nor out-put
produced.

Clearly the proposed 2nd line of production would have adverse effects on the transportation
system and truck traffic emissions in place and would have a regional effect since only lime
rock is located at the site and all other raw materials must be trucked in and final goods
trucked out.

26 ton per trip analysis: (capacity as suggested by truckers in the industry)
1,055,500 tons per line 2 alone proposed / 26 tons of capacity per truck capacity = 40,596
truck trips out alone, A doubling of these number of trips would be needed in order for trucks
to return to the plant 40,596 trips x 2 = 81,192 truck trips for line 2 alone

81,192 trips / = 8,760 (365 days x 24 hours a day) working hours available per year , equates
to 9.26 truck trips per hour, equaling a truck in or out once every 6.48 minutes solely for the
additional capacity proposed by line 2.

This analysis does not include the number of trips needed to come in and leave the plant for supplies nor energy fuel proposed as coal. It also does not include the truck trips needed to run the existing plant for energy (coal), raw materials and additives nor out-put produced.

Clearly the proposed 2nd line of production would have adverse effects on the transportation system and environmental conditions in place and would have a regional effect since only lime rock is located at the site and all other raw materials must be trucked in and final goods trucked out.

WATER QUALITY:

The process of mining in this area directly effects the florida aquifer since the plant is currently permitted to mine beyond the water table of the area. I believe the maximum amount of depth is 250 feet. Please refer to the Mine permit.

ENVIRONMENTAL MONITORING:

At the current time only 2 stations of air monitoring are in place one about 2500 feet from the plant to the west and the other about 4.5 miles to the east. There is no monitoring equipment in place at any other vicinity. I consider this sparse placement of minimal air monitoring equipment inadequate to demonstrate that adequate compliance is in affect, and that any harmful emissions can reasonably be monitored be fore detrimental harms is made to flora, fauna or human inhabitants in the plants flume effects *and only on PM10.*

SUBMITTED BY :



Anthony Cirigliano
January 31, 2006

Attested by :



LESLIE CHESHIRE
Notary Public, State of Florida
My comm. exp. July 24, 2009
Comm. No. DD 454020

Don & Ann Marie
Brennan

My wife and I moved to this beautiful area around six years ago. We've lived most of our 49 years in the Gainesville area. Over the years we have visited the Ichetucknee and the Santa Fe rivers and enjoyed the natural unspoiled beauty. The springs ,Blue, Poe Jenny, Rum Island, Lilly, Ichetucknee and others are truly magnificent to behold. When I first came and saw these spring as a teenager I was AMAZED, I could barely believe my eyes . I'd never see anything so beautiful. I hoped that some day I might be able to live near this area as an adult. Several years back this dream came true and we built a home on the Santa Fe River. It really is an incredible place to live.

When we heard that someone wanted to build a cement plant near the springs we couldn't believe it. Surely, we thought, no one from this area could possible want to do that. We watched the story unfold, we listened to a few powerful people persuade a community that a few (60 or so) jobs would be worth the risk of destroying one of the most pristine natural treasures in the United States. Of course that was debated, but no one can deny that tons of pollution (fine particulates) and pounds of toxic gas and substances like mercury WILL be released DAILY into the area. No one can deny THIS WILL have an adverse affect. But, still after much political pressure the plant was approved.

Now the plant wants to double the amounts of these toxins and pollution it will release into the environment of the area. I fear that if this is allowed there will be no turning back, the plant will only get dirtier and may also turn to even more harmful sources for fuel like tires or even medical or other hazardous waste so that they can make maximum profit. The plant can actually get paid to take these hazardous waste products to use for fuel, and they could even tell you they are helping to clean up the environment by getting rid of used tires and medical waste. What they won't mention is the toxic mess that will spew 24 hours a day from their stacks. A deadly mix of cancer causing matter that will float for miles on the wind in the form of ultra fine particles that contain dioxins, mercury and other known poisons and carcinogens. They will tell you what you want to hear, that they will use the cleanest technology to clean the exhaust from the plant that they will monitor,.....but the TRUTH is that no matter what they do thousands of pounds particulate matter containing cancer causing poison will be released every year. AND IT WILL NOT GO AWAY. It will be in the rivers, on the ground in your yards, eaten by fish and man, washed by the rain down the drains into our water supply and IT WILL CAUSE A LIFE-LONG HAZARD TO THE COMMUNITY.

So, in summary I ask that you carefully consider the decision you make today. Think about the community, as a living thing that breathes the air, drinks the water, and eats from the land and waters. The land, water, and air is here for all of the people, and no man, group or company should be able to make it unsafe for the rest of the community. We are the ones in-trusted to be the stewards of this land for now and for future generations to follow. Let this not be yet another of the things in which we tell our children how it used to be - how beautiful it was, how you could drink the water, swim in the rivers, eat the fish, and see wildlife around every turn. Now is the time to take a stand for what is right for the whole community not the profit and wants of a few.

Let us be clear about where the responsibility for this decision lies. Although we all have the opportunity to voice our concerns, only a few get to vote. I'm grateful for the opportunity to present my opinions, and pray that you who get to vote will take time to make a decision based on what you know in your heart to best for all.

Sincerely,

Don Brennan
Branford, Florida

Written Comment Form

Public Meeting – January 31, 2006
Suwannee American Cement - Expansion Project
Project No. 1210456-014-AC (PSD-FL-352) - Proposed 2nd Kiln System

Name: Annette Long - Save Our Suwannee, Inc.

Address: P.O. Box 2656 Chiefland FL 32644

Phone Number: 352-490-8930

Email: long5892@bellsouth.net

I have the following comments with regard to the proposed draft permit determination for the above referenced project:

I have attached a comment letter on our letterhead
with our comments and 4 attachments.

Thank you for your time.

Annette Long

Save Our Suwannee, Inc.

Post Office Box 669 • Bell, Florida 32619

January 31, 2006

Jeff Koerner
Manager Air Permitting North Section
2600 Blair Stone Road
Mail Station 5505
Tallahassee, FL 32399

Dear Mr. Koerner:

The purpose of this letter is to comment on the proposed expansion of the Suwannee American Cement Plant—Branford, Florida. Our group is concerned about the additional input of mercury emissions and the dangerous effect of this pollution on the Ichetucknee River, the Santa Fe River, the Suwannee River and the people living and visiting these treasures. These rivers already have dangerously high levels of this neurotoxic chemical, and the Rivers' residents will be exposed to even greater levels of deposition.

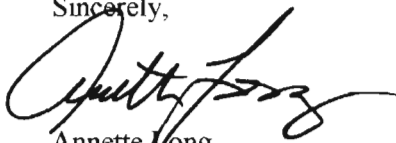
Mercury pollution is a major problem in Florida. We are asking Suwannee American Cement to reduce present mercury emissions. Our group has been made aware of new technology produced by Mazyck Technology Solutions, LLC. We have received information that Mazyck is currently developing technology for affordable, superior mercury emission reduction. I have attached an informational flier with contact information from Mazyck Technology Solutions, LLC. We are asking SAC to consider adding this technology to their existing operations and to any expansion. We are also open to other technology which SAC believes would reduce mercury emissions below present levels.

At this time, the Ichetucknee River is also having an excess nutrient crisis. Nitrates in the river are rising rapidly and algal problems are becoming pronounced, even to causing irritation to tubers and swimmers. We have researched this issue and have found that NOx emissions from coal burning furnaces can and do deposit additional nitrogen in a readily available nutrient form to the environment surrounding the coal furnace. It has been brought to our attention that the huge Tampa Bay nitrate problem was attributed primarily to air deposition.

It is our understanding that FDEP has not adopted 2.5 micro fine particulate matter standards. According to the National Lung Association, that is the level that does lung damage, not the 10 micro fine particulate matter standard which the FDEP does regulate and monitor. Due to the populated areas near the plant, can the current standard be increased?

We urge both the DEP and SAC, LLC to protect the health of their neighbors and local natural/recreational/cultural resources by controlling mercury, NOx and 2.5 particulate matter emissions. We have also added attachments concerning the safety and emissions of doubled commercial truck traffic.

Sincerely,



Annette Long
President
Save Our Suwannee, Inc.



Technology Excels at Removing Mercury from Combustion Sources



Solution:

Mazyck Technology Solutions, LLC (MTS) has developed an effective technology-driven solution for the removal of mercury from combustion sources. Our photocatalytic sorbent has proven to be a viable and cost-effective technology in reducing the cost per pound of mercury removed compared to traditional technologies.

Applications:

Highly effective solution for capturing mercury from a variety of combustion sources such as:

- ∨ Industrial, Commercial and Institutional Boilers and Process Heaters
- ∨ Coal-Fired Power Plants
- ∨ Hazardous Waste Combustors
- ∨ Municipal Waste Combustors – Large & Small
- ∨ Medical Waste Incinerators
- ∨ Ore processing facilities

Advantages:

- ∨ Adsorption capacity of MTS photocatalytic sorbent is orders of magnitude greater than that of existing technologies.
- ∨ Capable of 99% mercury removal efficiency.
- ∨ Technology can be used to adsorb **all** species of mercury.
- ∨ Low sorbent-to-mercury ratio leads to a reduction in the volume of sorbent required by as much as 90%.
- ∨ At least 75% less expensive than current baseline costs for mercury removal.

The Technology:

Mazyck Technology Solutions' (MTS) proprietary technology uses a composite material, which is manufactured using a patented process developed by the University of Florida.

This technology addresses the research priorities identified by the Department of Energy, the Electric Power Research Institute, and the Coal Utilization Research Council Clean Coal Technology Roadmap.

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SANFORD – Through a partnership with the Department, Seminole County this week dedicated nine school buses with newly installed pollution controls that will significantly reduce air emissions. Seminole County School Board outfitted the buses with pollution control devices that will eliminate more than 2.5 tons of air pollution during the remaining life of the buses.

"Reducing emissions and investing in clean energy technology will ensure a stronger, healthier environment for the future," said Central District Director Vivian Garfein. "By working with the local school board to reduce air emissions from school buses, we are providing cleaner air for Florida's children."

The County retrofitted the school buses with catalysts and ventilators that will significantly reduce particulate matter and other pollutants by changing them into water vapor and carbon dioxide. The pollution control devices will reduce particulate matter by up to 50 percent, hydrocarbon emissions by more than 70 percent and carbon monoxide emissions by more than 85 percent.

Installing the pollution control devices cost approximately \$1,300 per bus, with funding provided by the Central District office. In addition to the emission controls on the buses, Seminole County established an idling reduction program that further reduces emissions throughout its entire fleet. Reducing unnecessary idling can improve air quality, save fuel and reduce excess engine wear.

For more information on school bus retrofits and pollution prevention, visit the EPA's Clean School Bus USA Program's website at <http://www.epa.gov/cleanschoolbus/retrofit.htm>. For more information on Florida's Department of Environmental Protection, visit www.floridadep.org.

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LIVE OAK - 2006 is not yet a month old and according to the Florida Highway Patrol, there have been 11 fatalities in the tri-county region. Officials said the cause can be attributed to more people and traffic on the roads as well as road conditions. According to traffic studies, overall travel on rural roads rose 27% between 1990 and 2002. The report also said travel on rural roads by large commercial trucks was up 32% over the same time period. Meanwhile, researchers determined that traffic fatality rates are 2.5 times higher on rural roads than on all other roads. Florida is among the five states with the highest rate of traffic fatalities per 100 million miles traveled as well as being among the five states with the largest number of rural, non interstate traffic fatalities. To reduce rural highway traffic deaths, widening roads by paving shoulders, installing bumper strips to alert drivers to upcoming stop signs and installing turn lanes have been recommended. The Florida Department of Transportation said it has received federal funding to make improvements on rural roads with crash rates for fatalities or incapacitating injuries that were above state averages. In North Florida, the only rural road now scheduled for improvements under the federal program is a 35-mile stretch on U.S. 19 between Inglis and Chiefland.