Memorandum

Florida Department of
Environmental Protection

TO: Howard Rhodes

THRU: Trina Vielhauer
Al Linero

FROM: Greg DeAngelo

DATE: May 6, 2003

SUBJECT: DEP File No. 1210465-004-AC (PSD-FL-259C)
Suwannee American Cement – Application for Permit Modification
Updating Permit to Reflect "As-Built" Baghouse Design and Configuration &
Clarifying CEMS Requirements

A final permit amendment letter is attached for your approval and signature.

This amendment for the Suwannee American Cement construction permit updates the permit to reflect the as-built configuration and design of the material handling baghouses. The newly designed baghouses are located across the cement plant, from raw material transfer to clinker storage to finished product loadout. In some instances, two smaller baghouses were installed where one large baghouse was originally envisioned. The converse is also true: the original design called for two baghouses but only one was later determined to be adequate.

All the baghouses are subject to the same emission limit as before (0.0085 grains/dscf). The changes to the baghouses' design temperatures and flowrates actually lower the potential emissions of PM by lowering the net dscfm. Potential PM emissions will be reduced by 6.7 tons per year.

(The emission limits and control devices on the kiln and clinker cooler remain the same as originally designed and permitted.)

This amendment also clarifies the CEMS requirements. The language is similar to that used in the recent Florida Rock production increase permit in terms of specifying what span value to use for the monitor, what approach to follow to calculate the rolling averages, and the like.

An important distinction is that the optional THC monitor is explicitly designated as a compliance monitor. The original permit clearly called for a VOC monitor; a THC monitor is acceptable so long as all of the THC (as propane) is considered VOC (as propane) for purposes of compliance. This is a conservative approach since THC will always be less than or equal to VOC.

Day 90 for this application is May 24, 2003. I recommend your approval.

Attachment

TLV/AAL/gpd

Department of Environmental Protection

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

Jeb Bush
Governor

David B. Struhs
Secretary

May 6, 2003

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. 1210465-004-AC (PSD-FL-259C)
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

The Florida Department of Environmental Protection ("the Department") reviewed your application dated February 18, 2003, to update the above referenced construction permit to reflect the "as-built" design, configuration, and performance of the material handling baghouses at Suwannee American Cement. The Department notes that your application for permit modification does not affect emissions or control devices at the kiln or the clinker cooler.

As discussed in your application for permit modification, the as-built design and configuration of the material handling baghouses will result in a net reduction in the design air flow rate through the control devices (on a dry standard cubic feet per minute basis). Design temperatures and flowrates through the baghouses impact particulate matter (PM) emissions. Accordingly, the redesigned baghouse temperatures and flowrates described in the application for permit modification are specifically incorporated by reference into the permit. The application for permit modification itself forms the basis for this permitting action, and it is on file with the Department.

The Department also desires to take this opportunity to further clarify the Continuous Emission Monitoring (CEM) system requirements by including calculation procedures for the rolling and block averages, establishing appropriate span values for the monitors, and formalizing an optional approach for using a total hydrocarbon (THC) monitor to demonstrate compliance with the volatile organic compound (VOC) emission limit. No relaxation or significant change is being made to the requirement to continuously monitor and record emissions. This permitting action simply documents the Department-approved approach to performing the calculations necessary to compare the CEM system results to the permit emission limits already established.

Finally, the Department understands that the company has undergone recent reorganization. Please provide information regarding the structure and identity of the corporate entities associated with the plant. Identify which entity owns the cement plant real property and the building and fixtures versus which entity will be operating the plant. In addition, explain the relationship between these entities and any other entity that will be involved with the plant. This information will be necessary for processing

your Title V operating permit, the application for which is due 180 days after commencing operation (i.e., 180 days after February 17, 2003, or August 16, 2003).

The existing construction permit is hereby modified as follows:

SECTION III.B - SPECIFIC CONDITION 14

14. **Emissions Unit 002**: Emissions unit 002 shall have the following emission points:

EMISSION POINT	DESCRIPTION
E-28	Dust collector ~~for drops to homogenizing silo~~ – Aeropol at the homogenizing silo
E-34	Dust collector for off-spec feed handling
G-07	Dust collector for homogenizing silo inlet
H-08	Dust collector for ~~raw meal transport system~~ homogenizing silo outlet

Particulate matter (PM) emissions from each emission point of emissions unit 002 shall not exceed 0.01 grains/dscf, and PM_{10} emissions shall not exceed 0.0085 grains/dscf. Particulate matter emissions from each emission point of this emissions unit shall be controlled by a baghouse. Visible emissions from each emission point of this emissions unit shall not exceed 5% opacity.

Initial and annual compliance testing for PM emissions from this emissions unit is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version).

[Note: These emission limits effectively limit annual emissions of PM for all emission points in this emission unit to ~~6.2~~ 6.3 tons per year. PM_{10} emissions are estimated to equal 85% of PM emissions, or 5.3 tons per year. The particulate weight emission standards and the visible emissions limit of 5% opacity are BACT.]

[Rules 62-4.070(3), 62-210.700(5), 62-212.400 and 62-297.620(4), F.A.C., BACT and applicant request]

SECTION III.B - SPECIFIC CONDITION 15

15. **Emissions Unit 004**: Emissions unit 004 shall have one emission point, the stack of the in-line kiln/raw mill, designated by the applicant as E-21. Particulate matter emissions from this emissions unit shall be controlled by a baghouse.

Emissions from emissions unit 004, the in-line kiln/raw mill, shall not exceed the following limits for the following pollutants: [Emissions from the natural gas fired air heater are included in the limits below]

POLLUTANT	EMISSION LIMIT		AVERAGING TIME	BASIS
PM	0.13 lb/ton of dry preheater feed	23.1 lb/hour	3 hours [3]	BACT
PM_{10}	0.11 lb/ton of dry preheater feed	19.6 lb/hour	3 hours [3]	BACT
SO_2	0.27 lb/ton of clinker	28.4 lb/hour	3 hours [4]	BACT
NO_X	2.9 lb/ton of clinker [1]	304.5 lb/hour [1]	24 hours [4]	BACT
CO	3.6 lb/ton of clinker	378.0 lb/hour	3 hours [5]	BACT
VOC	0.12 lb/ton of clinker [2]	12.6 lb/hour [2]	30 days [6]	BACT
VE	10% opacity		6 minutes [7]	BACT

[1] NOx emissions shall not exceed 3.8 lb/ton of clinker and 399.0 lb/hour during the first 12 months after initial startup. After 12 months after initial plant startup, emissions of NOx shall not exceed the limits shown in the table. Emissions of NOx up to 600 lb/hr for up to one hour in duration shall be allowed for each startup of the pyroprocessing system which occurs when there is no material in the kiln.

[2] VOC emissions shall be expressed as propane. If a total hydrocarbon (THC) monitor is used to demonstrate compliance with the VOC emissions limit as allowed pursuant to specific condition 18 of this subsection, THC emissions shall be expressed as propane.

[3] The averaging times for PM and PM_{10} correspond to the required length of sampling for the initial and subsequent emission tests.

[4] The averaging time for NOx shall be a 24-hour rolling average ~~that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding 23 hours~~ computed in accordance with specific condition 18 of this subsection. The averaging time for SO_2 shall be a 3-hour rolling average ~~that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding two hours. Each hourly average shall be computed from a minimum of one measurement every minute~~ computed in accordance with specific condition 18 of this subsection.

[5] The averaging time for CO corresponds to the required length of sampling for the initial and subsequent emission tests.

[6] The averaging time for VOC shall be a 30 calendar-day block average ~~that shall be computed from a minimum of one measurement every minute~~ computed in accordance with specific condition 18 of this subsection.

[7] The averaging time for visible emissions shall be a 6-minute block average that shall be computed from a minimum of one measurement every 15 seconds. The 6 minute block averages shall start at the beginning of each hour.

[Note: These emission limits, along with annual production limits, effectively limit annual emissions to: PM, 92.8; PM_{10}, 78.4; SO_2, 113.4; NOx, 1217.5; CO, 1511.1; and VOC, 50.4 tons per year. First year NOx emissions are effectively limited to 1595.4 tons per year. NOx emissions are estimated assuming that two startups as specified occur per year, each resulting in maximum allowable excess emissions. Mercury introduced into the pyroprocessing system is limited pursuant to specific condition 13 of this subsection of this permit; annual emissions of mercury are effectively limited by this condition to 97 pounds per year.]

[Rules 62-4.070(3) and 62-212.400, F.A.C., and BACT]

No owner or operator of a Portland Cement kiln shall cause, permit, or allow the emission of particulate matter in excess of 0.50 pounds per ton to the kiln (dry basis, excluding fuel), or visible emissions the density of which is greater than 20 percent opacity. [Rule 62-296.701(2)(a), F.A.C.]

[Note: The BACT emission limits of this permit (table above) are more stringent than the limits imposed by this rule.]

SECTION III.B - SPECIFIC CONDITION 17

17. **Emissions Unit 006**: Emissions unit 006 shall have the following emission points:

EMISSION POINT	DESCRIPTION
L-03	Dust collector for clinker ~~transport system~~ conveyor
L-06	Dust collector for clinker ~~storage system~~ silo inlet
L-25	Dust collector for gypsum/off-spec clinker transport
M-08	Dust collector for clinker ~~transport system~~ conveyor
M-09	Dust collector for clinker conveyor
N-09	Dust collector for finish mill air separator
N-12	Dust collector for finish mill ~~vent~~
N-36	Dust collector for fringe cement silo
N-91	Dust collector for ~~clinker grinding~~ (finish mill~~)~~
Q-14	Dust collector for cement ~~loading system~~ truck loadout
Q-17	Dust collector for cement ~~loading system~~ truck loadout
~~Q-25~~ P-03	Dust collector for cement ~~storage silo~~ transport conveyor
~~Q-26~~ P-11	Dust collector for cement storage silo
~~R-12~~ Q-24	Dust collector for cement ~~packing operation~~ railcar loadout

Particulate matter (PM) emissions from each emission point of emissions unit 006 shall not exceed 0.01 grains/dscf, and PM_{10} emissions shall not exceed 0.0085 grains/dscf. Particulate matter emissions from each emission point of this emissions unit shall be controlled by a baghouse. Visible emissions from each emission point of this emissions unit shall not exceed 5% opacity.

For emission points N-09 and N-12, after initial testing that demonstrates compliance with the PM limit of this condition is completed, subsequent compliance testing for PM emissions from these emission points is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. For the other emission points of emissions unit 006, initial and annual compliance testing for PM emissions from these emission points is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version).

[Note: These emission limits effectively limit annual emissions of PM for all emission points in this emission unit to ~~68.4~~ 61.3 tons per year. PM_{10} emissions are estimated to equal 85% of PM emissions, or ~~58.1~~ 52.1 tons per year. The particulate weight emission standard and the visible emissions limit of 5% opacity are BACT.]

[Rules 62-4.070(3), 62-210.700(5), 62-212.400 and 62-297.620(4), F.A.C., BACT and applicant request]

SECTION III.B - SPECIFIC CONDITION 18

18. **Continuous Emission Monitoring Systems**: The owner or operator shall install, calibrate, maintain, and operate a continuous emission monitoring (CEM) system in the in-line kiln/raw mill stack to measure and record the emissions of NO_X, SO_2, and VOC from the in-line kiln/raw mill, in a manner sufficient to demonstrate compliance with the emission limits of this permit. ~~Compliance with the emission limit for NO_X shall be based on a 24-hour rolling average that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding 23 hours, and compliance with the emission limit for SO_2 shall be based on a rolling three-hour average that shall be recomputed every hour from the individual hourly averages for the current hour and the preceding two hours; each hourly average shall be computed from a minimum of one measurement every minute. Compliance with the emission limit for VOC shall be based on a 30 day block average that shall be computed from a minimum of one measurement every minute.~~ The CEM system shall express the results in units of pounds per ton of clinker produced, and pounds per hour.

a. *Compliance Demonstration*: Compliance with the emission limit for NO_X shall be based on a 24-hour rolling average that shall be recomputed after every valid hour as the arithmetic average of that hourly average and the preceding 23 valid hourly averages. Compliance with the emission limit for SO_2 shall be based on a rolling three-hour average that shall be recomputed after every valid hour as the arithmetic average of that hourly average and the preceding two valid hourly averages. Compliance with the emission limit for VOC shall be based on a 30 calendar-day block average that shall be computed as the arithmetic average of all valid hourly averages occurring within each 30 calendar-day block.

b. *Valid Hourly Averages*: Each hourly average shall be computed as the arithmetic average of the data points generated by the CEM system. Data points must be generated at least once per minute. For an hourly average to be considered valid, at least two data points separated by a period of 15 minutes or more must be used to compute the hourly average.

   i. Hours during which there is no preheater feed and no fuel fired to the kiln systems are not valid.

   ii. Hours during which the plant is firing fuel but producing no clinker are valid, but these hours are excluded from the production-normalized emission rate computation (pounds per ton of dry preheater feed or pounds per ton of clinker). These hours are included in any pollutant mass emission rate computation (pounds per hour).

c. *Data Availability*: During each semiannual (six-month) period, CEM system valid hourly averages shall be obtained for at least 90 percent of the operating hours for which the plant is producing clinker. If the CEM system does not obtain valid hourly averages for 90 percent or more of the operating hours per semiannual period for which the plant is producing clinker, the permittee shall submit a semiannual excess emissions and continuous monitoring system performance report. This report must include corrective actions, and it shall be submitted within 30 days following the end of each semiannual reporting period.

d. *Compliance Assurance*: CEM system breakdowns, malfunctions, repairs, calibration checks, zero adjustments, and span adjustments all result in periods during which CEM system data are not obtained. During such periods in excess of 120 hours per calendar quarter, the permittee shall assure compliance with the emissions standards of this permit through stack tests, alternative monitoring systems, or other methods as approved by the Department.

e. *THC Monitor*: At the option of the permittee, a total hydrocarbon (THC) monitor can be installed in place of the required VOC monitor provided that the monitor results ("THC as propane") are considered to be VOC ("VOC as propane") for purposes of compliance. If methane is measured concurrently with THC, then "THC as propane, minus methane" can be considered to be VOC ("VOC as propane") for purposes of compliance.

f. *Monitor Type and Span*: The span values for the NO_X, SO_2, and VOC (or THC) CEM systems shall be no less than 150 percent and no greater than 300 percent of the maximum permitted emissions of the inline kiln/raw mill. For purposes of setting CEM system span values, the mass emission rate (pounds per hour) for SO_2, NO_X, and VOC (or THC) shall be converted to an approximate stack gas concentration (ppm) based on the minimum expected stack gas flow rate (cubic feet per minute) and the permitted mass emission rate limit (pounds per hour). All CEM systems shall be capable of automatically switching to a higher span to accurately measure spikes of stack gas concentrations. The span value for the oxygen CEM system shall be 25 percent oxygen.

g. *Calculation Algorithm*: Rolling and block averages shall be calculated through the integrated and automated data acquisition and handling system of the CEM system or through some other method as approved by the Department. The calculation algorithm shall be documented and available on-site for inspection and verification.

[Rule 62-4.070(3), F.A.C., and BACT]

[Note: Continuous opacity monitor (COM) systems shall be installed, operated, and maintained at the kiln/raw mill baghouse stack and the outlet of the clinker cooler ESP pursuant to 40 CFR ~~60.63~~ 63.1350. A continuous emission monitor for emissions of total hydrocarbon is required pursuant to 40 CFR 63.1349 and 63.1450. A continuous monitor for the temperature at the inlet to the in-line kiln/raw mill baghouse is required pursuant to 40 CFR 63.1349 and 63.1450.]

SECTION III.C - SPECIFIC CONDITION 4

4. **Emissions Unit 008**: Emissions unit 008 shall have the following emission points:

EMISSION POINT	DESCRIPTION
S-17 East	Coal mill
S-17 West	Coal mill
S-21	Dust collector for coal transfer system.

Particulate matter emissions from all emission points in this emissions unit shall be controlled by baghouses.

Particulate matter (PM) emissions from each emission point of emissions unit 008 shall not exceed 0.01 grains/dscf, and PM_{10} emissions shall not exceed 0.01 grains/dscf. Particulate matter emissions from each emission point of this emissions unit shall be controlled by a baghouse. Visible emissions from each emission point of this emissions unit shall not exceed 5% opacity.

For emission points S-17 East and S-17 West, after initial testing that demonstrates compliance with the PM limit of this condition is completed, subsequent compliance testing for PM emissions from this emission point is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. For the other emission point of emissions unit 008, initial and annual compliance testing for PM emissions from this emission point is waived, and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to

believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version).

[Note: These emission limits effectively limit annual emissions of PM for all emission points in this emission unit to ~~7.9~~ 8.2 tons per year. PM_{10} emissions are estimated to equal PM emissions, or ~~7.9~~ 8.2 tons per year. The particulate weight emission standard and the visible emissions limit of 5% opacity are BACT.]

[Rules 62-4.070(3), 62-210.700(5), 62-212.400 and 62-297.620(4), F.A.C., BACT and applicant request]

SECTION III.C - SPECIFIC CONDITION 5

5. **Emission Tests Required – Emissions Unit 008**: The owner or operator shall demonstrate compliance with the visible emissions standard for emissions unit 008 annually using EPA Method 9, as described in 40 CFR 60 Appendix A (1997 version). The owner or operator shall demonstrate initial compliance with the particulate matter (PM) limits of this permit for emission points S-17 East and S-17 West of emissions unit 008 using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version). Should subsequent particulate matter (PM) testing be required for either emission point of emissions unit 008, compliance shall be demonstrated using EPA Method 5. Testing for PM_{10} is not required, because all PM emissions shall be assumed to be PM_{10}.

   [Rules 62-4.070(3), 62-297.310 and 62-297.620(4), F.A.C. and BACT]

SECTION III.C - SPECIFIC CONDITION 8

8. **Pursuant to 40 CFR 60.250 Applicability and Designation of Affected Facility**:

   (a) The provisions of this subpart are applicable to any of the following affected facilities in coal preparation plants which process more than 200 tons per day: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), and coal storage systems.

   [40 CFR 60.250]

   [Note: The coal mill, emission points S-17 East and S-17 West of emissions unit 008, is subject to the requirements for thermal dryers. Emissions unit 009 is subject to the requirements for coal processing and conveying equipment. Both emission points of emissions unit 008 are also subject to the emission limits for coal processing and conveying equipment, but the BACT limits are as stringent or more stringent than the limits imposed by this rule.]

   These terms are defined at 40 CFR 60.251. The definitions are applicable to this project but have been omitted for brevity. See the Code of Federal Regulations for the text of this section.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than

those entitled to written notice under Section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3) of the Florida Statutes, however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 of the Florida Statutes, or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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 of the Florida Administrative Code.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 of the Florida Statutes. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the

petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) of the Florida Statutes, and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106 of the Florida Administrative Code, and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301 of the Florida Administrative Code. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

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

Howard L. Rhodes, Director
Division of Air Resources
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 5/15/03 to the person(s) listed:

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

Clerk Stamp

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

Victoria Gibson May 15, 2003
(Clerk) (Date)

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly): Susan Vaughn — B. Date of Delivery: 5-19-03

C. Signature: X Susan Vaughn — ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

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PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

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Sent To: Celso A. Martini
Street, Apt. No.; or PO Box No. PO Box 410
City, State, ZIP+4 Branford, FL 32008

PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 3692 5962

SENDER: COMPLETE THIS SECTION

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1. Article Addressed to:

Mr. Claude Grinfeder
Suwannee American Cement
Post Office Box 410
Branford, FL 32008

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly): Susan Vaughn — B. Date of Delivery: 5-19-03

C. Signature: X Susan Vaughn — ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

7001 0320 0001 3692 5948

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postmark Here

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Sent To: Claude Grinfeder
Street, Apt. No.; or PO Box No. PO Box 410
City, State, ZIP+4 Branford, FL 32008

PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 3692 5948

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Lawrence E. Sellers, Jr.
Esquire
Holland & Knight, LLP
Post Office Drawer 810
Tallahassee, FL 32301

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly): Eric Kent — B. Date of Delivery: 5/19/03

C. Signature: X E K — ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

7001 0320 0001 3692 5955

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postmark Here

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Sent To: Lawrence E. Sellers, Jr.
Street, Apt. No.; or PO Box No. PO Drawer 810
City, State, ZIP+4 Tallahassee, FL 32301

PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 3692 5955

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tom Greenhalgh
1211 Paul Russell Road
Tallahassee, FL 32301-7102

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) | B. Date of Delivery

C. Signature

X ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

7001 0320 0001 3692 5931

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postmark Here

Postage $
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees $

Sent To Tom Greenhalgh
Street, Apt. No. or PO Box No. 1211 Paul Russell Rd.
City, State, ZIP+4 Tallahassee, FL 32301-7102

PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 3692 5931

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Rodney J. Long, Chair
Alachua County Board of
County Commissioners
Post Office Box 2877
Gainesville, FL 32602-2877

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) J Crow | B. Date of Delivery 12-19-03

C. Signature

X J. Crow ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

7001 0320 0001 3692 5917

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postmark Here

Postage $
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees $

Sent To Rodney J. Long
Street, Apt. No. or PO Box No. PO Box 2877
City, State, ZIP+4 Gainesville, FL 32602-2877

PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 3692 5917

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Patrice Boyes, Esquire
Boyes and Associates, PA
Post Office Box 1424
Gainesville, FL 32602

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) NADIA LEA | B. Date of Delivery 12-19-03

C. Signature

X Nadia Lea ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

7001 0320 0001 3692 5924

PS Form 3811, July 1999 Domestic Return Receipt 102595-99-M-1789

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Postmark Here

Postage $
Certified Fee
Return Receipt Fee (Endorsement Required)
Restricted Delivery Fee (Endorsement Required)
Total Postage & Fees $

Sent To Patrice Boyes
Street, Apt. No. or PO Box No. PO Box 1424
City, State, ZIP+4 Gainesville, FL 32602

PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 3692 5924

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **Suwannee American Cement**	
2. Site Name: **Branford Cement Plant**	
3. Facility Identification Number: **1210465**	[ ] Unknown
4. Facility Location: Street Address or Other Locator: **5117 U.S. Highway 27** City: **Branford** County: **Suwannee** Zip Code: **32008**	
5. Relocatable Facility? [ ] Yes [X] No	6. Existing Permitted Facility? [X] Yes [ ] No

Application Contact

1. Name and Title of Application Contact: **Steven C. Cullen, PE** **Senior Project Engineer**
2. Application Contact Mailing Address: Organization/Firm: **Koogler & Associates** Street Address: **4014 NW 13th Street** City: **Gainesville** State: **Florida** Zip Code: **32609**
3. Application Contact Telephone Numbers: Telephone: **(352) 377-5822** Fax: **(352) 377-7158**

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	2/24/03
2. Permit Number:	1210465-004-AC
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[ ] Initial Title V air operation permit for an existing facility which is classified as a Title V source.

[ ] Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number:_____

[ ] Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number:_____

Operation permit number to be revised:_____

[ ] Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected:_____

[ ] Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

[**X**] Air construction permit to construct or modify one or more emissions units.

[ ] Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.

[ ] Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official:
Celso A. Martini: Plant Manager

2. Owner/Authorized Representative or Responsible Official Mailing Address:
Organization/Firm: **Suwannee American Cement**
Street Address: **Post Office Box 410**
City: **Branford** State: **Florida** Zip Code: **32008**

3. Owner/Authorized Representative or Responsible Official Telephone Numbers:
Telephone: **(386) 935-0966** Fax: **(386) 935-1155**

4. Owner/Authorized Representative or Responsible Official Statement:

I, the undersigned, am the owner or authorized representative(check here [ ], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Signature 02-20-2003 Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: **Steven C. Cullen, PE**
Registration Number: **45188**

2. Professional Engineer Mailing Address:
Organization/Firm: **Koogler & Associates**
Street Address: **4014 NW 13th Street**
City: **Gainesville** State: **Florida** Zip Code: **32609**

3. Professional Engineer Telephone Numbers:
Telephone: **(352) 377-5822** Fax: **(352) 377-7158**

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [ ], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [X], if so), I further certify that the engineering features of each such emissions unit described in this application have been ~~designed or~~ examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [ ], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

2/18/2003
Date

(seal)

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
002	Raw Material Processing Operations Controlled by Baghouses	ACM1	$250
006	Clinker and Cement Processing Operations Controlled by Baghouses		
008	Coal Mill and Coal Transfer System Controlled by Baghouses		

Application Processing Fee

Check one: [X] Attached - Amount: $250 [ ] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

During the final design of the Suwannee American Cement Company (SAC) Branford Plant, changes to preliminary design and/or reconfiguration of the preliminary design have resulted in:

1. **For Emissions Unit 002, the replacement of a single emission point for particulate matter emissions by two emission points with the addition of a second fabric filter dust collector to control emissions from the added emission point. Design flow rates and design operating temperatures have also been changed for certain control devices.**
2. **For Emissions Unit 006, the addition of three new particulate matter emission points with associated fabric filter (baghouse) dust collectors; and**
3. **the reconfiguration of three other particulate matter emission points and the associated fabric filter dust collectors. Design flow rates and design operating temperatures have also been changed for certain control devices.**
4. **For Emissions Unit 008, a previously permitted single baghouse is being served by two baghouses with a combined exhaust and a higher flow rate.**

The design changes and reconfiguration will result in a net reduction in the design air flow rate from the affected emission units. This will result in a net decrease in the permitted particulate matter emission rate from the affected emission units. The net change in PM emissions from the changes detailed in this application is a decrease of 6.7 tons per year.

2. Projected or Actual Date of Commencement of Construction: **N/A**

3. Projected Date of Completion of Construction: **March 1, 2003**

Application Comment

The change in PM emissions from all emission points in emissions unit 002 is an increase from 6.2 tons per year to 6.3 tons per year.

The change in PM emissions from all emission points in emissions unit 006 is a decrease from 68.4 tons per year to 61.3 tons per year.

The change in PM emissions from all emission points in emissions unit 008 is an increase from 7.9 tons per year to 8.2 tons per year.

The net change in PM emissions from the changes detailed in this application is a decrease of 6.7 tons per year.

II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates: Zone: **17** East (km): **321.4 km** North (km): **3315.9**			
2. Facility Latitude/Longitude: Latitude (DD/MM/SS): **29° 57' 45"** Longitude (DD/MM/SS): **82° 51' 03"**			
3. Governmental Facility Code: **0**	4. Facility Status Code: **C**	5. Facility Major Group SIC Code: **32**	6. Facility SIC(s): **3241**
7. Facility Comment (limit to 500 characters): **None**			

Facility Contact

1. Name and Title of Facility Contact: **George Townsend – Environmental Manager**
2. Facility Contact Mailing Address: Organization/Firm: **Suwannee American Cement** Street Address: **5117 U.S. Highway 27** City: **Branford** State: **Florida** Zip Code: **32008**
3. Facility Contact Telephone Numbers: Telephone: **(386) 935-0966** Fax: **(386) 935-1155**

Facility Regulatory Classifications

Check all that apply:

1. [ ] Small Business Stationary Source? [X] Unknown
2. [X] Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?
3. [ ] Synthetic Minor Source of Pollutants Other than HAPs?
4. [ ] Major Source of Hazardous Air Pollutants (HAPs)?
5. [ ] Synthetic Minor Source of HAPs?
6. [X] One or More Emissions Units Subject to NSPS?
7. [X] One or More Emission Units Subject to NESHAP?
8. [ ] Title V Source by EPA Designation?
9. Facility Regulatory Classifications Comment (limit to 200 characters): **It has not yet been determined whether the facility will be major for HAPs.**

List of Applicable Regulations

Title V Core List
NSPS Subparts Y and OOO
NESHAP Subpart LLL:
40 CFR 63.1340 **40 CFR 63.1341** **40 CFR 63.1342** **40 CFR 63.1351** **40 CFR 63.1353** **40 CFR 63.1354** **40 CFR 63.1355** **40 CFR 63.1356** **40 CFR 63.1357** **40 CFR 63.1358** **40 CFR 63.1359**

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap lb/hour	tons/year	4. Basis for Emissions Cap	5. Pollutant Comment
PM	**A**	Not Requested	Not Requested	No Basis	None
PM10	**A**	Not Requested	Not Requested	No Basis	None
SO2	**A**	Not Requested	Not Requested	No Basis	None
NOx	**A**	Not Requested	Not Requested	No Basis	None
CO	**A**	Not Requested	Not Requested	No Basis	None
VOC	**B**	Not Requested	Not Requested	No Basis	None
DIOX	**B**	Not Requested	Not Requested	No Basis	None
H114	**B**	Not Requested	Not Requested	No Basis	None

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **On file with Department**
2. Facility Plot Plan: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **On file with Department**
3. Process Flow Diagram(s): [**X**] Attached, Document ID: **Engineering Report**
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **On file with Department**
5. Fugitive Emissions Identification: [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested **On file with Department**
6. Supplemental Information for Construction Permit Application: [**X**] Attached, Document ID: **Engineering Report**
7. Supplemental Requirements Comment: **None**

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities:
   [ ] Attached, Document ID:_____ [X] Not Applicable to current project

9. List of Equipment/Activities Regulated under Title VI:
   [ ] Attached, Document ID:_____
   [ ] Equipment/Activities On site but Not Required to be Individually Listed
   [X] Not Applicable

10. Alternative Methods of Operation:
    [ ] Attached, Document ID:_____ [X] Not Applicable

11. Alternative Modes of Operation (Emissions Trading):
    [ ] Attached, Document ID:_____ [X] Not Applicable

12. Identification of Additional Applicable Requirements:
    [ ] Attached, Document ID:_____ [X] Not Applicable

13. Risk Management Plan Verification:
    [ ] Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID:_____) or previously submitted to DEP (Date and DEP Office:_____)
    [ ] Plan to be submitted to CEPPO (Date required:_____)
    [X] Not Applicable

14. Compliance Report and Plan:
    [ ] Attached, Document ID:_____ [X] Not Applicable

15. Compliance Certification (Hard-copy Required):
    [ ] Attached, Document ID:_____ [X] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):

Raw Material Processing Operations Controlled by Baghouses

4. Emissions Unit Identification Number: ID: **002** [ ] No ID [ ] ID Unknown

5. Emissions Unit Status Code: **C**	6. Initial Startup Date: **N/A**	7. Emissions Unit Major Group SIC Code: **32**	8. Acid Rain Unit? [ ]

9. Emissions Unit Comment: (Limit to 500 Characters): **None**

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Fabric Filters – High Temperature
- **E28**
- **E34 [NEW]**

Fabric Filters – Medium Temperature
- **G-07**
- **H-08**

2. Control Device or Method Code(s): **016, 017**

Emissions Unit Details

1. Package Unit: **Not Applicable**
   Manufacturer: Model Number:
2. Generator Nameplate Rating: **Not Applicable** MW
3. Incinerator Information: **Not Applicable**
   Dwell Temperature: °F
   Dwell Time: seconds
   Incinerator Afterburner Temperature: °F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: **Not Applicable**		mmBtu/hr
2. Maximum Incineration Rate: **Not Applicable**	lb/hr	tons/day
3. Maximum Process or Throughput Rate: **178 TPH Dry Preheater Feed**		
4. Maximum Production Rate: **Not Applicable**		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): **None**		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

NESHAP Subpart LLL:
40 CFR 63.1348
40 CFR 63.1349(a)
40 CFR 63.1349(b)(2)
40 CFR 63.1349(c)
40 CFR 63.1350(a)
40 CFR 63.1350(b)
40 CFR 63.1350(j)
40 CFR 63.1350(l)

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **See below**	2. Emission Point Type Code: **3**

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):

E-28: Aeropol @ Homogenizing Silo
[NEW] **E-34: Off-Spec Feed Handling**
G-07: Homogenizing Silo Inlet
H-08: Homogenizing Silo Outlet

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **N/A**

5. Discharge Type Code: **V**	6. Stack Height: **Table** feet	7. Exit Diameter: **Table** feet
8. Exit Temperature: **Table** °F	9. Actual Volumetric Flow Rate: **Table** acfm	10. Water Vapor: **Table** %

11. Maximum Dry Standard Flow Rate: **Table** dscfm	12. Nonstack Emission Point Height: **N/A** feet

13. Emission Point UTM Coordinates: **Optional field – left blank**

Zone: East (km): North (km):

14. Emission Point Comment (limit to 200 characters): **None**

	HEIGHT FT.	DIAM. FT.	TEMP. °F	ACFM	H20	DSCFM
E-28	56	1.0	300	3,000	2%	2043
E-34	50	1.0	300	2,000	2%	1362
G-07	242	2.2	200	15,000	2%	11760
H-08	50	1.0	200	2,000	2%	1568
					Total =	**16732**

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Cement Manufacturing – Dry Process: Raw Material Transfer**		
2. Source Classification Code (SCC): **3-05-006-12**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **178 TPH** **Dry Preheater Feed**	5. Maximum Annual Rate: **1,427,880 TPY** **Dry Preheater Feed**	6. Estimated Annual Activity Factor: **Not Applicable**
7. Maximum % Sulfur: **Not Applicable**	8. Maximum % Ash: **Not Applicable**	9. Million Btu per SCC Unit: **Not Applicable**
10. Segment Comment (limit to 200 characters): **AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259**		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	**016, 017**	**None**	**EL**
PM10	**016, 017**	**None**	**EL**

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **99%**
3. Potential Emissions: **1.43** lb/hour **6.3** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: **Not Applicable** [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **BACT**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.01 gr/dscf x 16732 dscfm x 60 min/hr x 1 lb/7000 gr = 1.43 lb/hour @ 8760 hr/yr = 6.3 tons/year**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259** The additional baghouse (E-34) increases annual emissions of PM from this emission unit. A higher design temperature for baghouse E-28 (300 °F instead of 212 °F) and a lower flow rate for baghouse H-08 (2000 acfm instead of 3000 acfm) reduce PM emissions from these emission points. The change in PM emissions from all emission points in this emissions unit is from 6.2 tons per year to 6.3 tons per year.	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **Not Applicable**
3. Requested Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **1.43** lb/hour **6.3** tons/year
5. Method of Compliance (limit to 60 characters): **Method 9 in lieu of Method 5**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT: AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259**	

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control: **99%**
3. Potential Emissions: **1.22** lb/hour **5.3** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: **Not Applicable** [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.0085 gr/dscf** Reference: **BACT**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.0085 gr/dscf x 16732 dscfm x 60 min/hr x 1 lb/7000 gr = 1.22 lb/hour @ 8760 hr/yr = 5.3 tons/year**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259** There is no net change in PM_{10} emissions for all emission points in this emission unit. [From 5.3 tons per year to 5.3 tons per year]	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **Not Applicable**
3. Requested Allowable Emissions and Units: **0.0085 gr/dscf**	4. Equivalent Allowable Emissions: **1.22** lb/hour **5.3** tons/year
5. Method of Compliance (limit to 60 characters): **Method 9 in lieu of Method 5**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT: AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **5%** Exceptional Conditions: **5%** Maximum Period of Excess Opacity Allowed: **0** min/hour	
4. Method of Compliance: **Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **BACT: 62-212.400 and 62-297.620(4), FAC. This limitation is more stringent than the NESHAP.**	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **10%** Exceptional Conditions: **10%** Maximum Period of Excess Opacity Allowed: **0** min/hour	
4. Method of Compliance: **Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **40 CFR 63.1348: Affected sources other than raw mill**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code: **Not Applicable**	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [X] Attached, Document ID: **Engineering Report**
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [X] Attached, Document ID: **Engineering Report**
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested **On file with Department**
5. Compliance Test Report: [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [X] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [X] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [X] Attached, Document ID: **Engineering Report**
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [X] Not Applicable
10. Supplemental Requirements Comment: **None**

Additional Supplemental Requirements for Title V Air Operation Permit Applications

[Not applicable to this application]

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Regulated or Unregulated Emissions Unit? (Check one)

[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):

Clinker and Cement Processing Operations Controlled by Baghouses

4. Emissions Unit Identification Number: ID: **006** [ ] No ID [ ] ID Unknown

5. Emissions Unit Status Code: **C**	6. Initial Startup Date: **N/A**	7. Emissions Unit Major Group SIC Code: **32**	8. Acid Rain Unit? [ ]

9. Emissions Unit Comment: (Limit to 500 Characters): **None**

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Fabric Filters – Low Temperature

[New] L-25 Dust collector for gypsum/OS clinker transport
[New] M-09 Clinker conveyor
N-09 Dust collector for finish mill air separator
[New] N-36 Dust collector for fringe cement silo
P-03 Dust collector for cement transport conveyor [replaces Q-25]
P-11 Dust collector for cement storage silo [replaces Q-26]
Q-14 Dust collector for cement truck loadout
Q-17 Dust collector for cement truck loadout
Q-24 Dust collector for railcar loadout [replaces R-12]

Fabric Filters – Medium Temperature

M-08 Clinker conveyor
N-12 Dust collector for finish mill
N-91 Dust collector for finish mill

Fabric Filters – High Temperature

L-03 Dust collector for clinker conveyor
L-06 Dust collector for clinker silo inlet

2. Control Device or Method Code(s): **016, 017, 018**

Emissions Unit Details

1. Package Unit: **Not Applicable**
   Manufacturer: Model Number:
2. Generator Nameplate Rating: **Not Applicable** MW
3. Incinerator Information: **Not Applicable**
   Dwell Temperature: °F
   Dwell Time: seconds
   Incinerator Afterburner Temperature: °F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: **Not Applicable**		mmBtu/hr
2. Maximum Incineration Rate: **Not Applicable**	lb/hr	tons/day
3. Maximum Process or Throughput Rate: **105 TPH Clinker**		
4. Maximum Production Rate: **150 TPH Cement**		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):		
AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259		

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

NESHAP Subpart LLL:
40 CFR 63.1347
40 CFR 63.1348
40 CFR 63.1349(a)
40 CFR 63.1349(b)(2)
40 CFR 63.1349(c)
40 CFR 63.1350(a)
40 CFR 63.1350(b)
40 CFR 63.1350(e)
40 CFR 63.1350(j)
40 CFR 63.1350(l)

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **See below**	2. Emission Point Type Code: **3**

3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point):

L-03 Dust collector for clinker conveyor
L-06 Dust collector for clinker silo inlet
[New] L-25 Dust collector for gypsum/OS clinker transport
M-08 Dust collector for clinker conveyor
[New] M-09 Dust collector for clinker conveyor
N-09 Dust collector for finish mill air separator
N-12 Dust collector for finish mill
[New] N-36 Dust collector for fringe cement silo
N-91 Dust collector for finish mill
P-03 Dust collector for cement transport conveyor [replaces Q-25]
P-11 Dust collector for cement storage silo [replaces Q-26]
Q-14 Dust collector for cement truck loadout
Q-17 Dust collector for cement truck loadout
Q-24 Dust collector for railcar loadout [replaces R-12]

4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **N/A**

5. Discharge Type Code: **V**	6. Stack Height: **Table** feet	7. Exit Diameter: **Table** feet
8. Exit Temperature: **Table** °F	9. Actual Volumetric Flow Rate: **Table** acfm	10. Water Vapor: **Table** %

11. Maximum Dry Standard Flow Rate: **Table** dscfm	12. Nonstack Emission Point Height: **Not Applicable** feet

13. Emission Point UTM Coordinates: **Optional field – left blank**

Zone: East (km): North (km):

14. Emission Point Comment (limit to 200 characters): **None**

	HEIGHT FT.	DIAM. FT.	TEMP. °F	ACFM	H20	DSCFM
L-03	37	1.0	300	3,000	2%	2043
L-06	192	1.1	300	6,000	2%	4085
L-25	82	1.0	90	4,000	2%	3763
M-08	19	1.1	212	6,000	2%	4620
M-09	10	1.1	90	3,000	2%	2822
N-09	131	7.6	158	103,600	2%	86742
N-12	131	4.0	203	35,000	2%	27316
N-36	65	1.4	130	4,000	2%	3508
N-91	47	1.4	200	6,000	2%	4704
P-03	54	1.0	130	3,000	2%	2631
P-11	195	2.0	130	15,000	2%	13155
Q-14	29	1.0	130	3,000	2%	2631
Q-17	39	1.0	130	3,000	2%	2631
Q-24	57	1.0	130	3,000	2%	2631
					Total =	163283

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Cement Manufacturing – Dry Process: Clinker Transfer**		
2. Source Classification Code (SCC): **3-05-006-16**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **105**	5. Maximum Annual Rate: **839,500**	6. Estimated Annual Activity Factor: **Not Applicable**
7. Maximum % Sulfur: **Not Applicable**	8. Maximum % Ash: **Not Applicable**	9. Million Btu per SCC Unit: **Not Applicable**
10. Segment Comment (limit to 200 characters): **AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259**		

Segment Description and Rate: Segment 2 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Cement Manufacturing – Dry Process: Clinker Silos**		
2. Source Classification Code (SCC): **3-05-006-15**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **105**	5. Maximum Annual Rate: **839,500**	6. Estimated Annual Activity Factor: **Not Applicable**
7. Maximum % Sulfur: **Not Applicable**	8. Maximum % Ash: **Not Applicable**	9. Million Btu per SCC Unit: **Not Applicable**
10. Segment Comment (limit to 200 characters): **AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259**		

Segment Description and Rate: Segment 3 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Cement Manufacturing – Dry Process: Finish Grinding Mill**		
2. Source Classification Code (SCC): **3-05-006-17**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **150**	5. Maximum Annual Rate: **1,191,360**	6. Estimated Annual Activity Factor: **Not Applicable**
7. Maximum % Sulfur: **Not Applicable**	8. Maximum % Ash: **Not Applicable**	9. Million Btu per SCC Unit: **Not Applicable**
10. Segment Comment (limit to 200 characters): **PERMIT 1210465-001-AC, PSD-FL-259**		

Segment Description and Rate: Segment 4 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Cement Manufacturing – Dry Process: Cement Silos**		
2. Source Classification Code (SCC): **3-05-006-18**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **150**	5. Maximum Annual Rate: **1,191,360**	6. Estimated Annual Activity Factor: **Not Applicable**
7. Maximum % Sulfur: **Not Applicable**	8. Maximum % Ash: **Not Applicable**	9. Million Btu per SCC Unit: **Not Applicable**
10. Segment Comment (limit to 200 characters): **PERMIT 1210465-001-AC, PSD-FL-259**		

Segment Description and Rate: Segment 5 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Cement Manufacturing – Dry Process: Cement Loadout**		
2. Source Classification Code (SCC): **3-05-006-19**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **500**	5. Maximum Annual Rate: **1,191,360**	6. Estimated Annual Activity Factor: **Not Applicable**
7. Maximum % Sulfur: **Not Applicable**	8. Maximum % Ash: **Not Applicable**	9. Million Btu per SCC Unit: **Not Applicable**
10. Segment Comment (limit to 200 characters): **Annual rate limited by cement production**		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	**016, 017, 018**	**None**	**EL**
PM10	**016, 017, 018**	**None**	**EL**

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **99%**
3. Potential Emissions: **14.00** lb/hour **61.3** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: **Not Applicable** [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factors: **0.01 gr/dscf** Reference: **BACT**	7. Emissions Method Code: **0**

8. Calculation of Emissions (limit to 600 characters):

Baghouses
0.01 gr/dscf x 163,283 dscfm x 60 min/hr x 1 lb/7000 gr = 14.00 lb/hour
@ 8760 hours/year = 61.3 tons/year

9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters):

The additional baghouses change annual emissions of PM from this emission unit. Different design temperatures and flow rates for other baghouses change PM emissions from these emission points.

The change in PM emissions from all emission points in this emissions unit is from 68.4 tons per year to 61.3 tons per year.

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **Not Applicable**
3. Requested Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **14.00** lb/hour **61.3** tons/year

5. Method of Compliance (limit to 60 characters):
Method 5 (N-09 & N-12)
Method 9 in lieu of Method 5 (other baghouses)

6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):
BACT: 62-212.400, FAC

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control: **99%**
3. Potential Emissions: **11.90** lb/hour **52.1** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: **Not Applicable** [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factors: **0.0085 gr/dscf** Reference: **BACT**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **Baghouses** **0.0085 gr/dscf x 163,283 dscfm x 60 min/hr x 1 lb/7000 gr = 11.90 lb/hour @ 8760 hours/year = 52.1 tons/year**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **The change in PM10 emissions from all emission points in this emissions unit is from 58.1 tons per year to 52.1 tons per year.**	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **Not Applicable**
3. Requested Allowable Emissions and Units: **0.0085 gr/dscf**	4. Equivalent Allowable Emissions: **11.90** lb/hour **52.1** tons/year
5. Method of Compliance (limit to 60 characters): **Method 5 (N-09 & N-12)** **Method 9 in lieu of Method 5 (other baghouses)**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT: 62-212.400, FAC**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **5%** Exceptional Conditions: **5%** Maximum Period of Excess Opacity Allowed: **0** min/hour	
4. Method of Compliance: **Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **BACT: 62-212.400, FAC. This limitation is more stringent than the NESHAP.**	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: **VE10**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **10%** Exceptional Conditions: **10%** Maximum Period of Excess Opacity Allowed: **0** min/hour	
4. Method of Compliance: **Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **40 CFR 63.1347** **40 CFR 63.1348**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code: **Not Applicable**	2. Pollutant(s):
3. CMS Requirement:	[ ] Rule [ ] Other
4. Monitor Information: Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [ ] Attached, Document ID: **Engineering Report**
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [**X**] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [ ] Attached, Document ID: **Engineering Report**
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
5. Compliance Test Report: [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [**X**] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested **To be provided under separate cover**
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested **To be provided under separate cover**
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ID: **Engineering Report**
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [**X**] Not Applicable
10. Supplemental Requirements Comment: **None**

Additional Supplemental Requirements for Title V Air Operation Permit Applications

[Not applicable to this application]

11. Alternative Methods of Operation
[ ] Attached, Document ID:_____ [ ] Not Applicable

12. Alternative Modes of Operation (Emissions Trading)
[ ] Attached, Document ID:_____ [ ] Not Applicable

13. Identification of Additional Applicable Requirements
[ ] Attached, Document ID:_____ [ ] Not Applicable

14. Compliance Assurance Monitoring Plan
[ ] Attached, Document ID:_____ [ ] Not Applicable

15. Acid Rain Part Application (Hard-copy Required)

[ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a))
Attached, Document ID:_____

[ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.)
Attached, Document ID:_____

[ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.)
Attached, Document ID:_____

[ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.)
Attached, Document ID:_____

[ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.)
Attached, Document ID:_____

[ ] Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.)
Attached, Document ID:_____

[ ] Not Applicable

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[**X**] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Regulated or Unregulated Emissions Unit? (Check one)

[**X**] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.

[ ] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.

3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):

Coal Mill and Coal Transfer System Controlled by Baghouses

4. Emissions Unit Identification Number: ID: **008** [ ] No ID [ ] ID Unknown

5. Emissions Unit Status Code: **C**	6. Initial Startup Date: **N/A**	7. Emissions Unit Major Group SIC Code: **32**	8. Acid Rain Unit? [ ]

9. Emissions Unit Comment: (Limit to 500 Characters) : **None**

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Fabric Filters – Low Temperature

- **S-17 East: Coal mill**
- **S-17 West: Coal mill**
- **S-21: Coal bin**

2. Control Device or Method Code(s): **018**

Emissions Unit Details

1. Package Unit: **Not Applicable**		
Manufacturer:	Model Number:	
2. Generator Nameplate Rating: **Not Applicable**	MW	
3. Incinerator Information: **Not Applicable**		
Dwell Temperature:		°F
Dwell Time:		seconds
Incinerator Afterburner Temperature:		°F

B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: **Not Applicable**	mmBtu/hr
2. Maximum Incineration Rate: **Not Applicable** lb/hr	tons/day
3. Maximum Process or Throughput Rate: **10,658 tons of coal and petroleum coke per month & 127,896 tons per year**	
4. Maximum Production Rate: **Not Applicable**	
5. Requested Maximum Operating Schedule:	
24 hours/day	**7** days/week
52 weeks/year	**8760** hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): **None**	

C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)

List of Applicable Regulations

62-212.400, FAC
NSPS Subpart Y

D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **S-17, S-21**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): • **S-17 East: Coal mill** • **S-17 West: Coal mill** • **S-21: Coal bin**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **Not Applicable**		
5. Discharge Type Code: **V**	6. Stack Height: **Table** feet	7. Exit Diameter: **Table** feet
8. Exit Temperature: **Table** °F	9. Actual Volumetric Flow Rate: **Table** acfm	10. Water Vapor: **Table** %
11. Maximum Dry Standard Flow Rate: **Table** dscfm	12. Nonstack Emission Point Height: **Not Applicable** feet	
13. Emission Point UTM Coordinates: **Optional field – left blank** Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters): **None**		

	HEIGHT FT.	DIAM. FT.	TEMP. °F	ACFM	H20	DSCFM
S-17 East	15	3.0	150	12,500	6.5%	10116
S-17 West	15	3.0	150	12,500	6.5%	10116
S-21	60	1.0	150	2,000	2%	1697
					Total =	**21,929**

E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Coal Crushing**		
2. Source Classification Code (SCC): **3-05-010-10**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **14.6 TPH (monthly avg.)**	5. Maximum Annual Rate: **127,896**	6. Estimated Annual Activity Factor: **Not Applicable**
7. Maximum % Sulfur: **Not Applicable**	8. Maximum % Ash: **Not Applicable**	9. Million Btu per SCC Unit: **Not Applicable**
10. Segment Comment (limit to 200 characters): **None**		

F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	**018**	**None**	**EL**
PM10	**018**	**None**	**NS**

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM**	2. Total Percent Efficiency of Control: **99%**
3. Potential Emissions: **1.88** lb/hour **8.2** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: **Not Applicable** [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **BACT**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.01 gr/dscf x 21929 dscfm x 60 min/hr x 1 lb/7000 gr = 1.88 lb/hour @ 8760 hr/yr = 8.2 tons/year**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259** The additional baghouse and a higher total flow rate for the coal mill (25000 acfm instead of 24000 acfm) increases PM emissions from these emission points. The change in PM emissions from all emission points in this emissions unit is from 7.9 tons per year to 8.2 tons per year.	

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **Not Applicable**
3. Requested Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **1.88** lb/hour **8.2** tons/year
5. Method of Compliance (limit to 60 characters): **Method 5: Initial for S-17 East/S-17 West** **Method 9: In lieu of Method 9 for S-21**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT: AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259**	

Potential/Fugitive Emissions

1. Pollutant Emitted: **PM10**	2. Total Percent Efficiency of Control: **99%**
3. Potential Emissions: **1.88** lb/hour **8.2** tons/year	4. Synthetically Limited? [ ]
5. Range of Estimated Fugitive Emissions: **Not Applicable** [ ] 1 [ ] 2 [ ] 3 _____ to _____ tons/year	
6. Emission Factor: **0.01 gr/dscf** Reference: **BACT**	7. Emissions Method Code: **0**
8. Calculation of Emissions (limit to 600 characters): **0.01 gr/dscf x 21929 dscfm x 60 min/hr x 1 lb/7000 gr = 1.88 lb/hour @ 8760 hr/yr = 8.2 tons/year**	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): **AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259** The additional baghouse and a higher total flow rate for the coal mill (25000 acfm instead of 24000 acfm) increases PM10 emissions from these emission points. The change in PM10 emissions from all emission points in this emissions unit is from 7.9 tons per year to 8.2 tons per year.	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: **RULE**	2. Future Effective Date of Allowable Emissions: **Not Applicable**
3. Requested Allowable Emissions and Units: **0.01 gr/dscf**	4. Equivalent Allowable Emissions: **1.88** lb/hour **8.2** tons/year
5. Method of Compliance (limit to 60 characters): **Method 5: Initial for S-17 East/S-17 West** **Method 9: In lieu of Method 9 for S-21**	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): **BACT: AIR CONSTRUCTION PERMIT 1210465-001-AC, PSD-FL-259**	

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation **1** of **2**

1. Visible Emissions Subtype: **VE05**	2. Basis for Allowable Opacity: [**X**] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **5%** Exceptional Conditions: **5%** Maximum Period of Excess Opacity Allowed: **0** min/hour	
4. Method of Compliance: **Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **BACT 62-212.400, FAC**	

Visible Emissions Limitation: Visible Emissions Limitation **2** of **2**

1. Visible Emissions Subtype: **VE20**	2. Basis for Allowable Opacity: [**X**] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **20%** Exceptional Conditions: **20%** Maximum Period of Excess Opacity Allowed: **0** min/hour	
4. Method of Compliance: **Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **40 CFR 60.252(a)(2)** **Coal handling**	

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code: **TEMP**	2. Pollutant(s): **N/A**
3. CMS Requirement:	[**X**] Rule [ ] Other
4. Monitor Information: **Not yet available** Manufacturer: Model Number:	Serial Number:
5. Installation Date:	6. Performance Specification Test Date:

7. Continuous Monitor Comment (limit to 200 characters):

40 CFR 60.253 Monitoring of operations:

The coal mill, emission point S-17 of emissions unit 008, is subject to the requirements for thermal dryers.

(a) The owner or operator of any thermal dryer shall install, calibrate, maintain, and continuously operate monitoring devices as follows:

(1) A monitoring device for the measurement of the temperature of the gas stream at the exit of the thermal dryer on a continuous basis. The monitoring device is to be certified by the manufacturer to be accurate within ±3° Fahrenheit.

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [**X**] Not Applicable [ ] Waiver Requested
3. Detailed Description of Control Equipment [**X**] Attached, Document ID: **Engineering Report**
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
5. Compliance Test Report: [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [**X**] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [**X**] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested **To be provided under separate cover**
8. Supplemental Information for Construction Permit Application [**X**] Attached, Document ID: **Engineering Report**
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [**X**] Not Applicable
10. Supplemental Requirements Comment: **None**

Additional Supplemental Requirements for Title V Air Operation Permit Applications

[Not applicable to this application]

11. Alternative Methods of Operation [ ] Attached, Document ID:_____ [ ] Not Applicable
12. Alternative Modes of Operation (Emissions Trading) [ ] Attached, Document ID:_____ [ ] Not Applicable
13. Identification of Additional Applicable Requirements [ ] Attached, Document ID:_____ [ ] Not Applicable
14. Compliance Assurance Monitoring Plan [ ] Attached, Document ID:_____ [ ] Not Applicable
15. Acid Rain Part Application (Hard-copy Required) [ ] Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID:_____ [ ] Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID:_____ [ ] New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID:_____ [ ] Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID:_____ [ ] Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID:_____ [ ] Phase II NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID:_____ [ ] Not Applicable

APPENDIX 1
Engineering Report & Attachments

Engineering Report In Support of Permit Amendment
Suwannee American Cement Company, Inc.
Branford Plant
DEP File No. 1210465-001-AC, PSD-FL-259

DUST COLLECTOR REVISIONS

During the final design of the Suwannee American Cement Company (SAC) Branford Plant, changes in preliminary design and/or reconfiguration of the preliminary design has resulted in the addition of three new particulate matter emission points and the associated fabric filter (baghouse) dust collectors; the replacement of a single emission point for particulate matter emissions by two emission points and the addition of a second fabric filter dust collector to control emissions from the added emission point; and the reconfiguration of three other particulate matter emission points and the associated fabric filter dust collectors. The design changes and reconfiguration will result in a reduction in the design air flow rate from the affected emission points and a reduction in total particulate matter emissions.

The process flow diagrams for the SAC plant as permitted are contained in Attachment 1. These process sheets show the baghouses that are currently permitted. The process flow sheets included in Attachment 2 show the design changes and/or reconfiguration with the added and replacement baghouses. Attachment 3 contains the specifications for all of the plant dust collectors.

Following is a brief description of the equipment changes. All emission points are presumed to operate 8,760 hours per year.

EMISSION UNIT 002

Dust from the kiln baghouse was originally transferred pneumatically to an Alleviator (Equipment No. 25-01; to vent the pneumatic transfer system) and then to a Distribution Box (E30-01). From the distribution box, the baghouse dust was originally transferred to the Homogenizing Silo (G01-01) or to a screw conveyor (E27-01). The Screw Conveyor, in turn, transferred the baghouse dust to the Kiln Dosing System (H05-01). The dust from the alleviator and distribution box was originally to be controlled by baghouse E-28 (3,000 acfm @ 212°F).

To eliminate the Screw Conveyor (E27-01), the pneumatic transfer of the kiln baghouse dust is now through a diverter valve which transfers the dust either to the alleviator (E25-01) still controlled by baghouse E28, or to the distribution box (E30-01) which is now controlled by new baghouse E-34 (2,000 acfm @ 300°F).

In essence, baghouses E-28 and E-34 are now doing what baghouse E-28 was previously designed to handle. For permitting purposes, it is presumed that both baghouses will operate continually.

EMISSION UNIT 006

Gypsum Storage Silo

Gypsum Storage Silo (L09-01) was added and is vented through new Baghouse L-25 (4,000 acfm @ 90°F).

Off-spec Clinker Silo

Off-Spec Clinker Silo (L08-01) was added and is also vented through new Baghouse L-25 (4,000 acfm @ 90°F).

Clinker Conveyor

The Gypsum Silo and Off-Spec Clinker Silo both discharge onto existing Pan Conveyor (M19-01) which transfers materials to the finish mill system. Dust from the discharge from the Gypsum Silo and Off-Spec Clinker Silo onto the pan conveyor is controlled by new Baghouse M-09 (3,000 acfm @ 90°F).

Fringe Cement Silo

A 140 ton Fringe Cement Silo (N30-01) was added following the finish mill to store off-spec cement. This silo is vented through new Baghouse N-36 (4,000 acfm @ 130°F). The fringe cement is blended back through the finish mill system with dust from material transfer handled by existing dust collectors.

Cement Silos

The existing design for the transfer of cement from the finish mill into cement silos 1-5 had potential particulate matter emissions controlled by two identical baghouses; Baghouse Q-25 and Baghouse Q-26 (both 12,000 acfm @ 150°F).

As a result of reconfiguration, Baghouses Q-25 and Q-26 are replaced by Baghouses P-03 (3,000 acfm @ 130°F) and P-11 (15,000 acfm @ 130°F).

Cement Pack-house

The original plant design envisioned a cement pack-house (cement bagging). The pack-house is not being constructed at this time. Baghouse R-12 (12,000 acfm @ 150°F) which was designed to control particulate matter emissions from the pack-house, will not be installed.

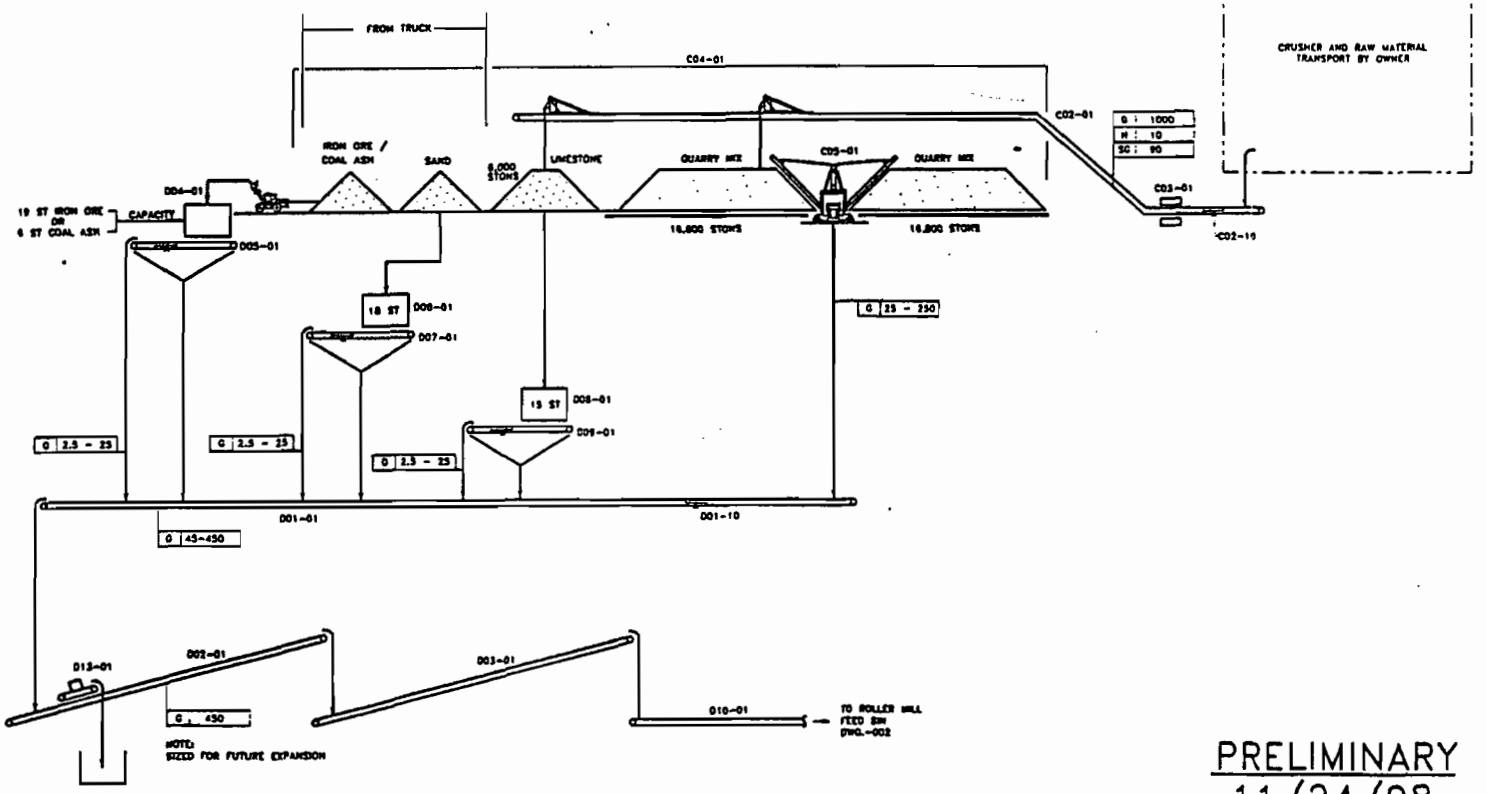
Rail Car Loadout

Rather than building a cement pack-house at this time, SAC has reconfigured the plant for a rail car loading system. The potential particulate matter emissions from rail car loadout will be controlled by Baghouse Q-24 (3,000 acfm @ 130°F).

EMISSION UNIT 008

For Emissions Unit 008, a previously permitted single baghouse is being served by two baghouses with a combined exhaust and a higher flow rate. The coal mill was previously to have been controlled by a single baghouse (S-17) with a flow rate of 24,000 acfm. It is proposed to control the coal mill with two baghouses (S-17 east and S-17 west), with a common stack and a total flow rate of 25,000 acfm.

ATTACHMENT 1
Process Flow Diagrams – As Permitted



LEGEND		
B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
M	%	MATERIAL MOISTURE
HV	BTU/LB	NET CALOR VALUE
K	IN	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200m
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	BTU/H	HEAT QUANTITY
QS	mmBTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SC	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F	AMBIENT TEMPERATURE: 20°F WINTER 90°F SUMMER RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VM	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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BRANFORD, FLORIDA

SUWANNEE 7400-7153

MECHANICAL PROCESS FLOW SHEET
RAW MATERIAL CRUSHING AND STORAGE

110.59.32-001

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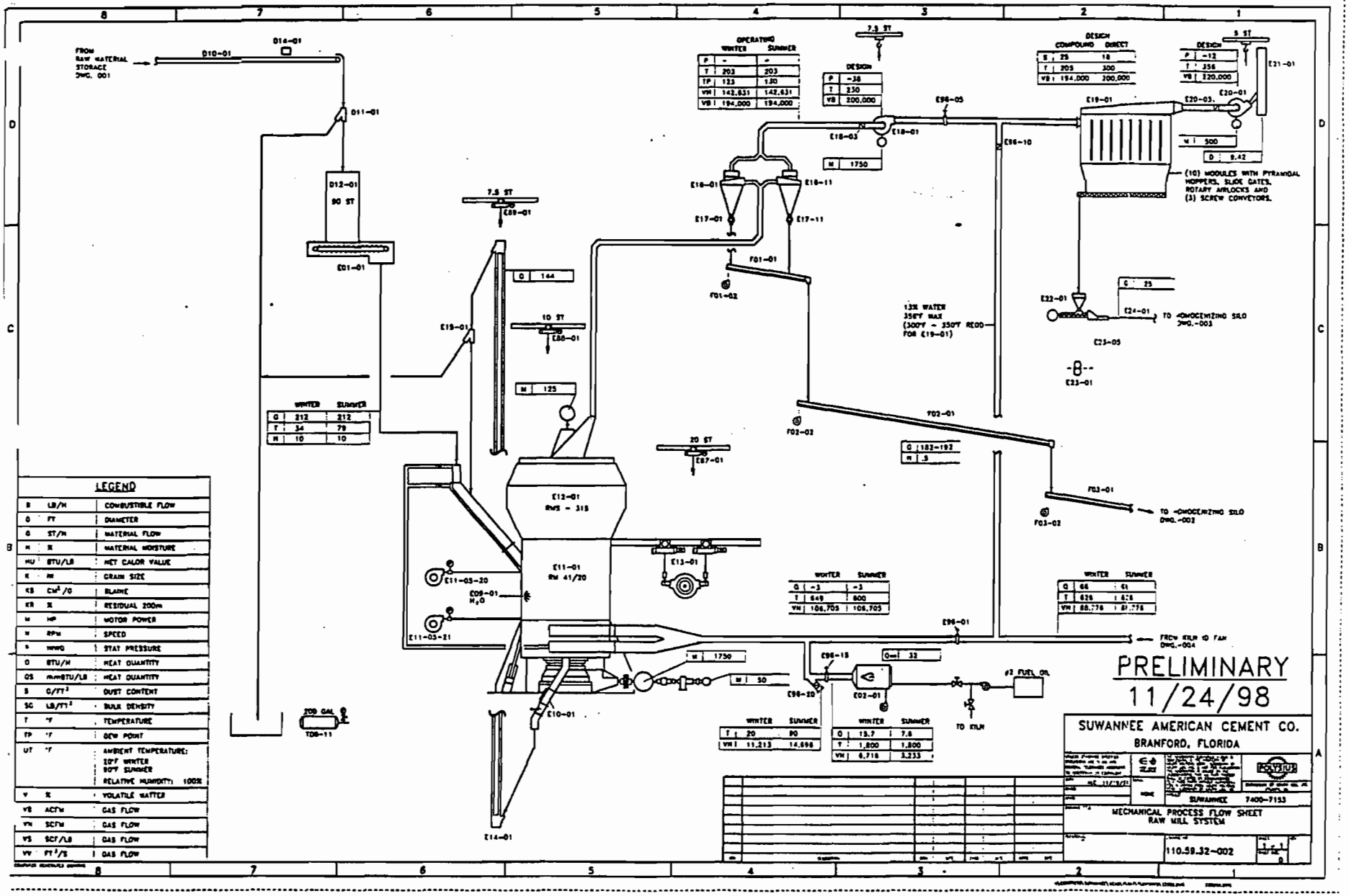

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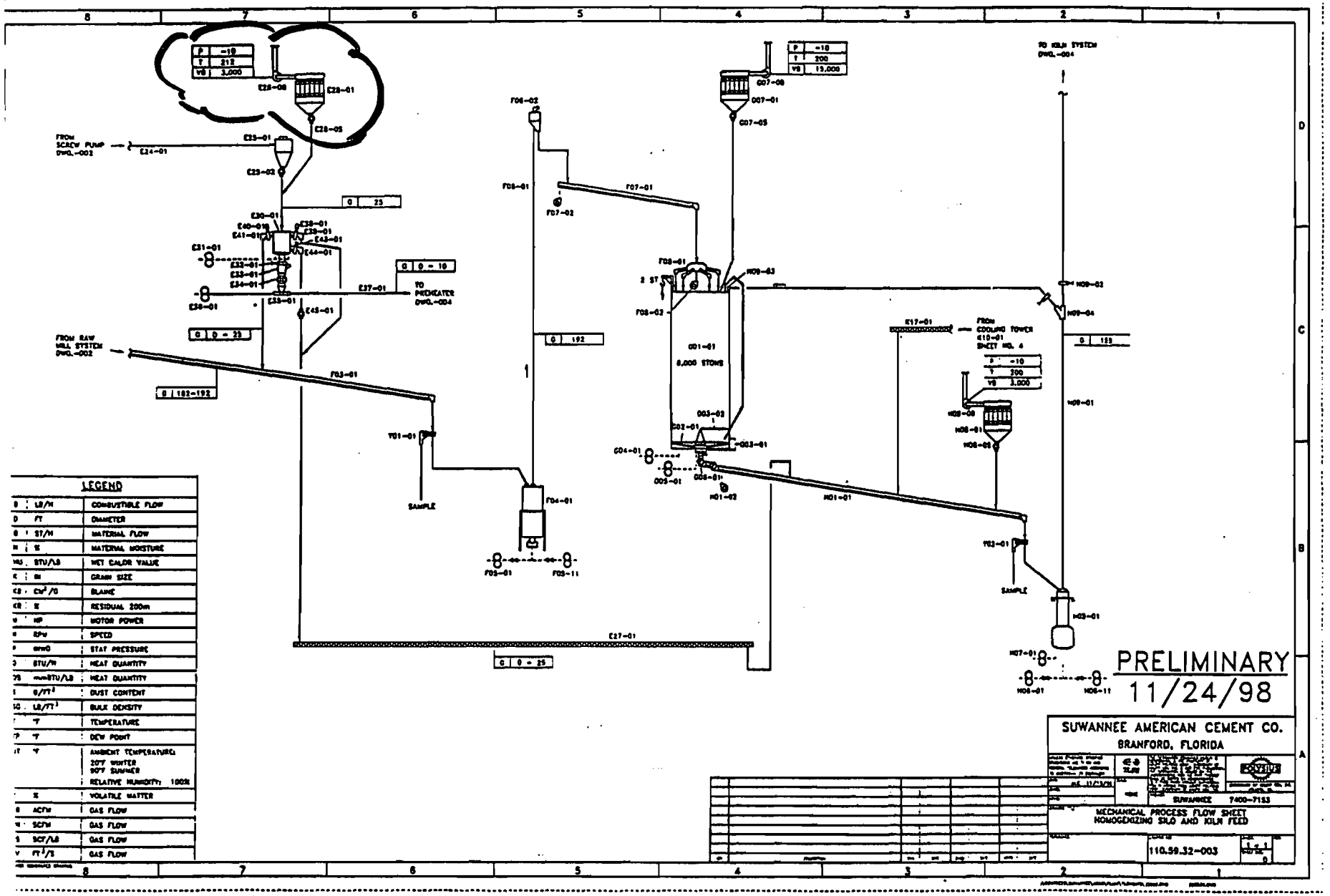

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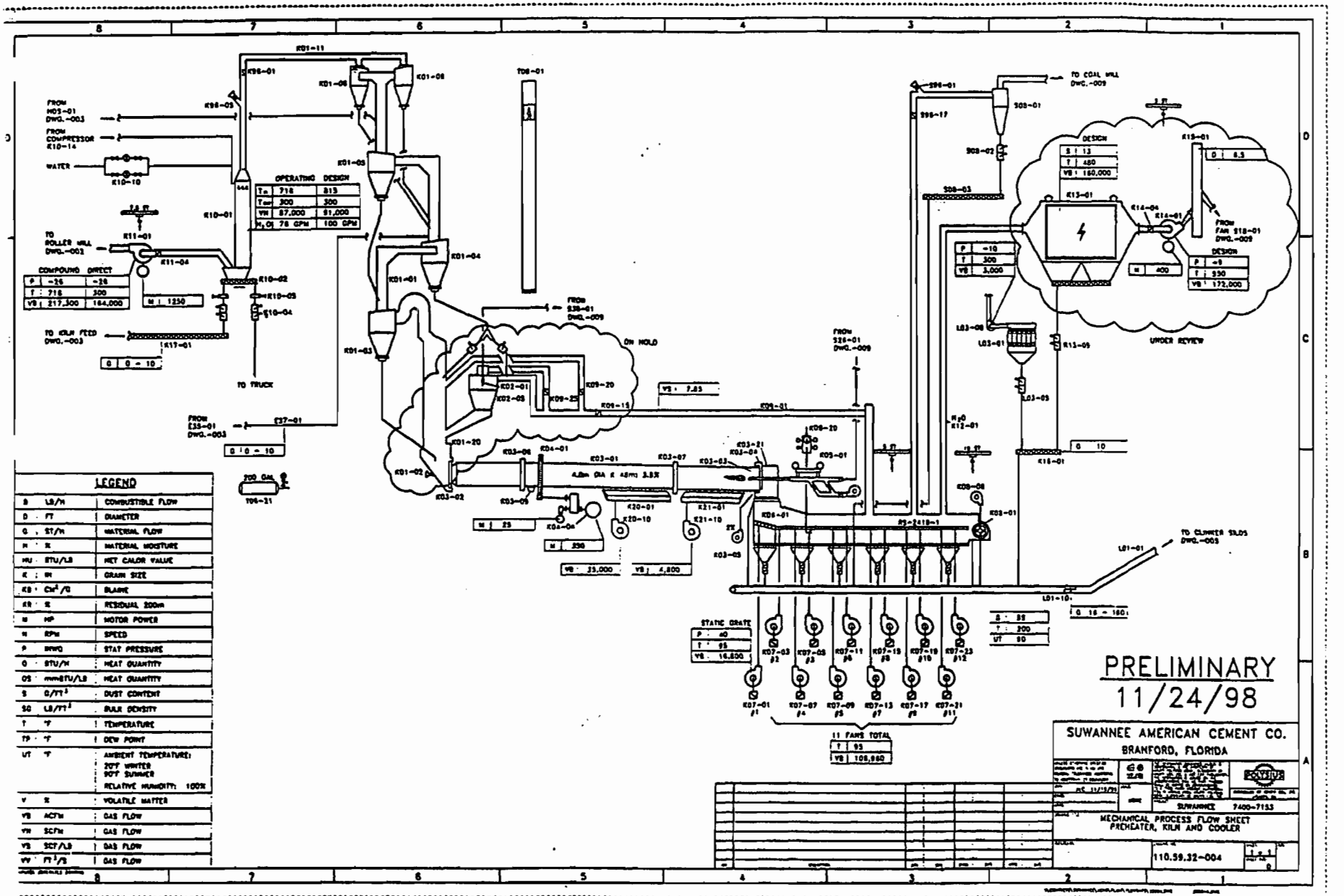
LEGEND
B LB/H COMBUSTIBLE FLOW
D FT DIAMETER
G ST/H MATERIAL FLOW
M % MATERIAL MOISTURE
HV BTU/LB NET CALOR VALUE
K MM GRAIN SIZE
KB CM²/G BLAINE
KR % RESIDUAL 200m
M HP MOTOR POWER
N RPM SPEED
P INWG STAT PRESSURE
Q BTU/H HEAT QUANTITY
QS mmBTU/LB HEAT QUANTITY
S G/FT³ DUST CONTENT
SD LB/FT³ BULK DENSITY
T °F TEMPERATURE
TP °F DEW POINT
UT °F AMBIENT TEMPERATURE: 20°F WINTER 90°F SUMMER RELATIVE HUMIDITY: 100%
V % VOLATILE MATTER
VB ACFM GAS FLOW
VN SCFM GAS FLOW
VS SCF/LB GAS FLOW
VV FT³/S GAS FLOW
OPERATING DESIGN
COMPOUND DIRECT
ON HOLD
UNDER REVIEW
STATIC GRATE
11 FANS TOTAL
PRELIMINARY
11/24/98
SUWANNEE AMERICAN CEMENT CO.
BRANFORD, FLORIDA
SUWANNEE 7400-7153
MECHANICAL PROCESS FLOW SHEET
PREHEATER, KILN AND COOLER
110.59.32-004

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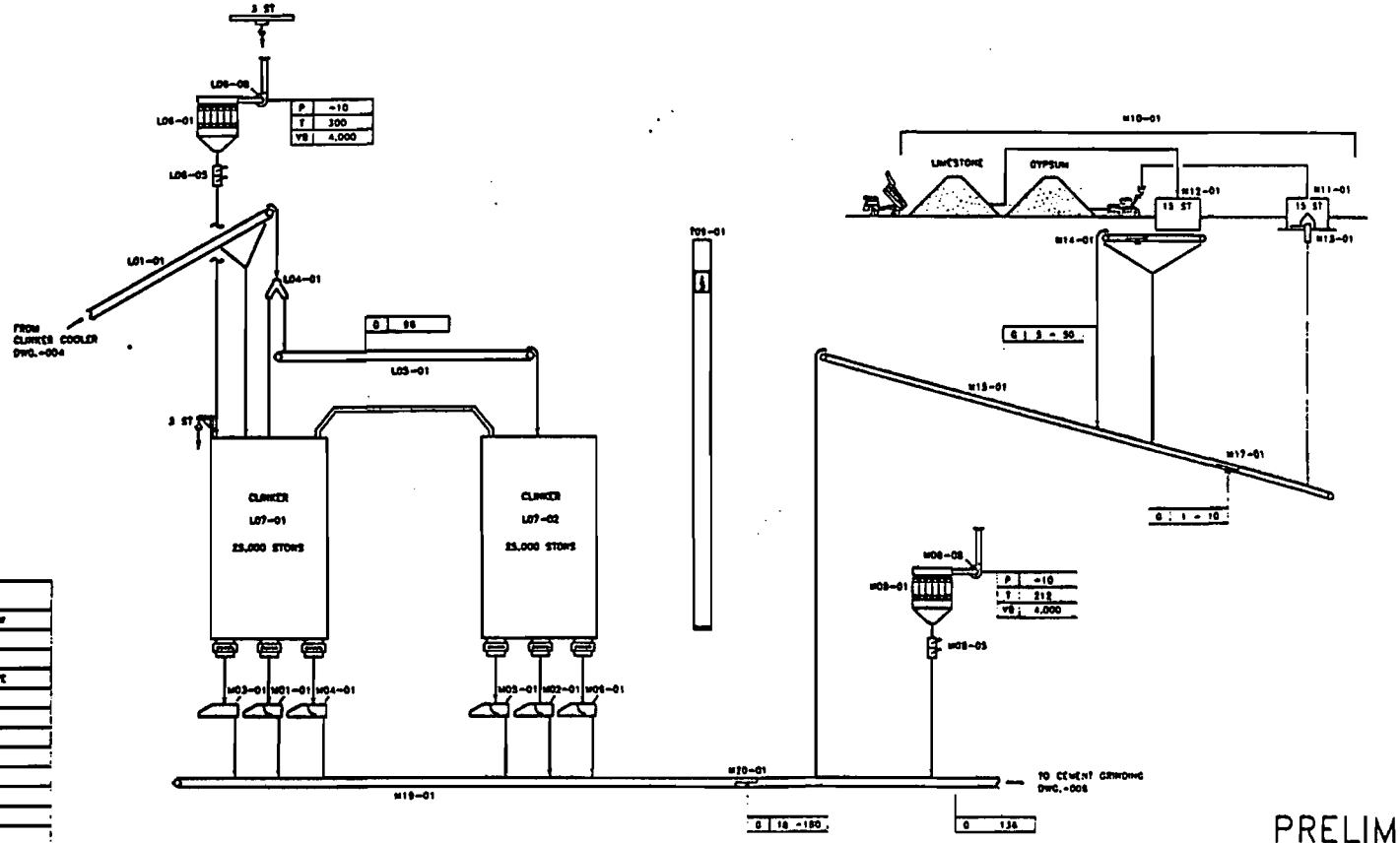

LEGEND

B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
M	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
G	IN	GRAIN SIZE
AB	CM^2/G	BLAINE
GR	%	RESIDUAL 200m
M	HP	MOTOR POWER
N	RPM	SPEED
P	mmWG	STAT PRESSURE
Q	BTU/H	HEAT QUANTITY
QS	mmBTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SG	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F	AMBIENT TEMPERATURE: 20FT WINTER 80FT SUMMER RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

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BRANFORD, FLORIDA

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SUWANNEE 7400-7153

MECHANICAL PROCESS FLOW SHEET
CLINKER SILOS AND ADDITIVES

110.59.32-003

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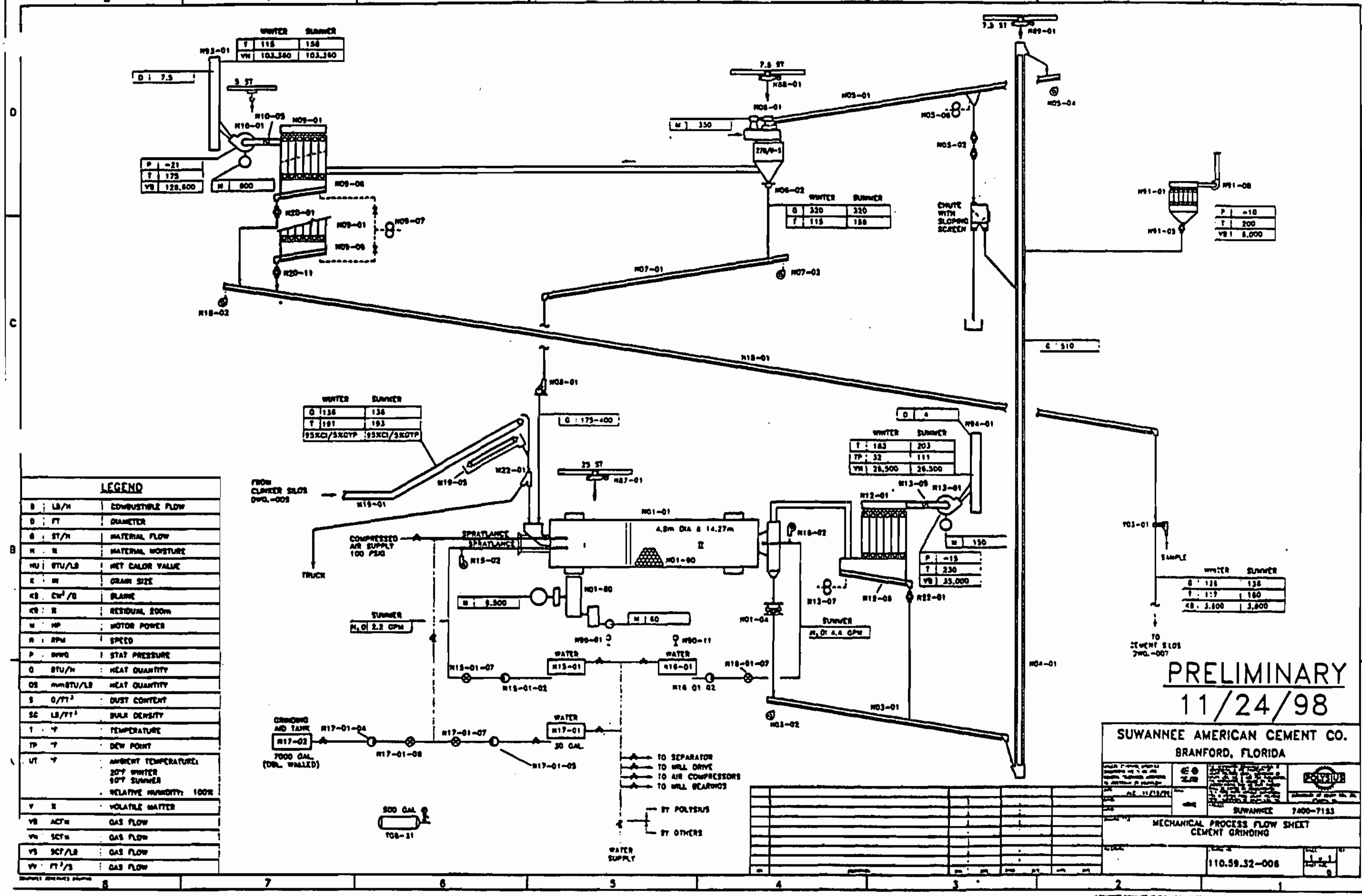

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LEGEND		
B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
H	%	MATERIAL MOISTURE
HU	BTU/LB	NET CALOR VALUE
K	M	GRAIN SIZE
KB	CM^2/G	BLAINE
KR	%	RESIDUAL 200m
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	BTU/H	HEAT QUANTITY
QS	mmBTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
SC	LB/FT^3	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F	AMBIENT TEMPERATURE: 20°F WINTER 90°F SUMMER RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

SUWANNEE AMERICAN CEMENT CO.
BRANFORD, FLORIDA

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SUWANNEE 7400-7153

MECHANICAL PROCESS FLOW SHEET
CEMENT GRINDING

110.59.32-008

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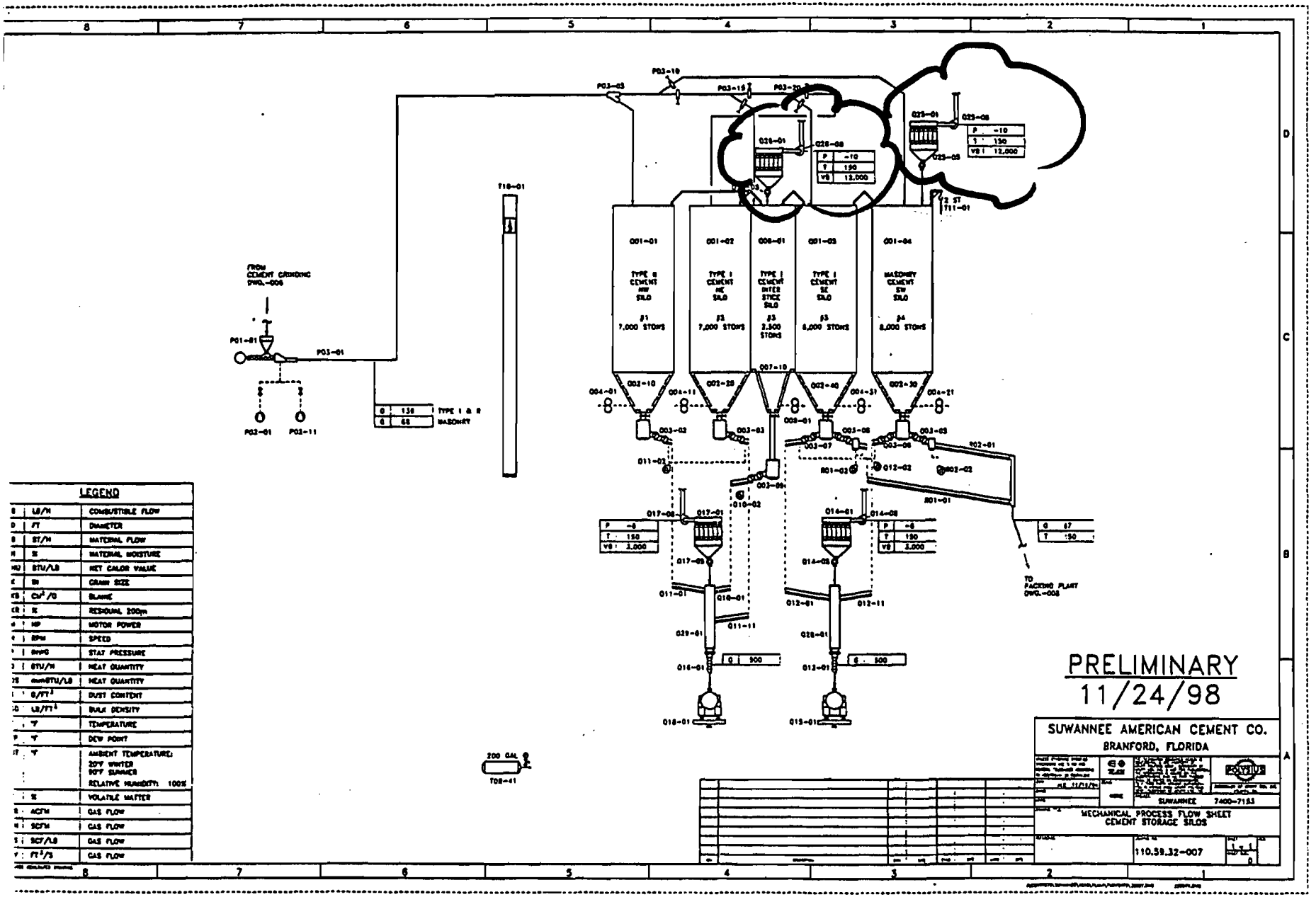

LEGEND	
LB/H	COMBUSTIBLE FLOW
FT	DIAMETER
ST/H	MATERIAL FLOW
%	MATERIAL MOISTURE
BTU/LB	NET CALOR VALUE
IN	GRAIN SIZE
CM^2/G	BLAINE
%	RESIDUAL 200m
HP	MOTOR POWER
RPM	SPEED
INWG	STAT PRESSURE
BTU/H	HEAT QUANTITY
mmBTU/LB	HEAT QUANTITY
G/FT^3	DUST CONTENT
LB/FT^3	BULK DENSITY
°F	TEMPERATURE
°F	DEW POINT
°F	AMBIENT TEMPERATURE: 20°F WINTER 90°F SUMMER RELATIVE HUMIDITY: 100%
%	VOLATILE MATTER
ACFM	GAS FLOW
SCFM	GAS FLOW
SCF/LB	GAS FLOW
FT^3/S	GAS FLOW

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SUWANNEE 7400-7153

MECHANICAL PROCESS FLOW SHEET
CEMENT STORAGE SILOS

110.59.32-007

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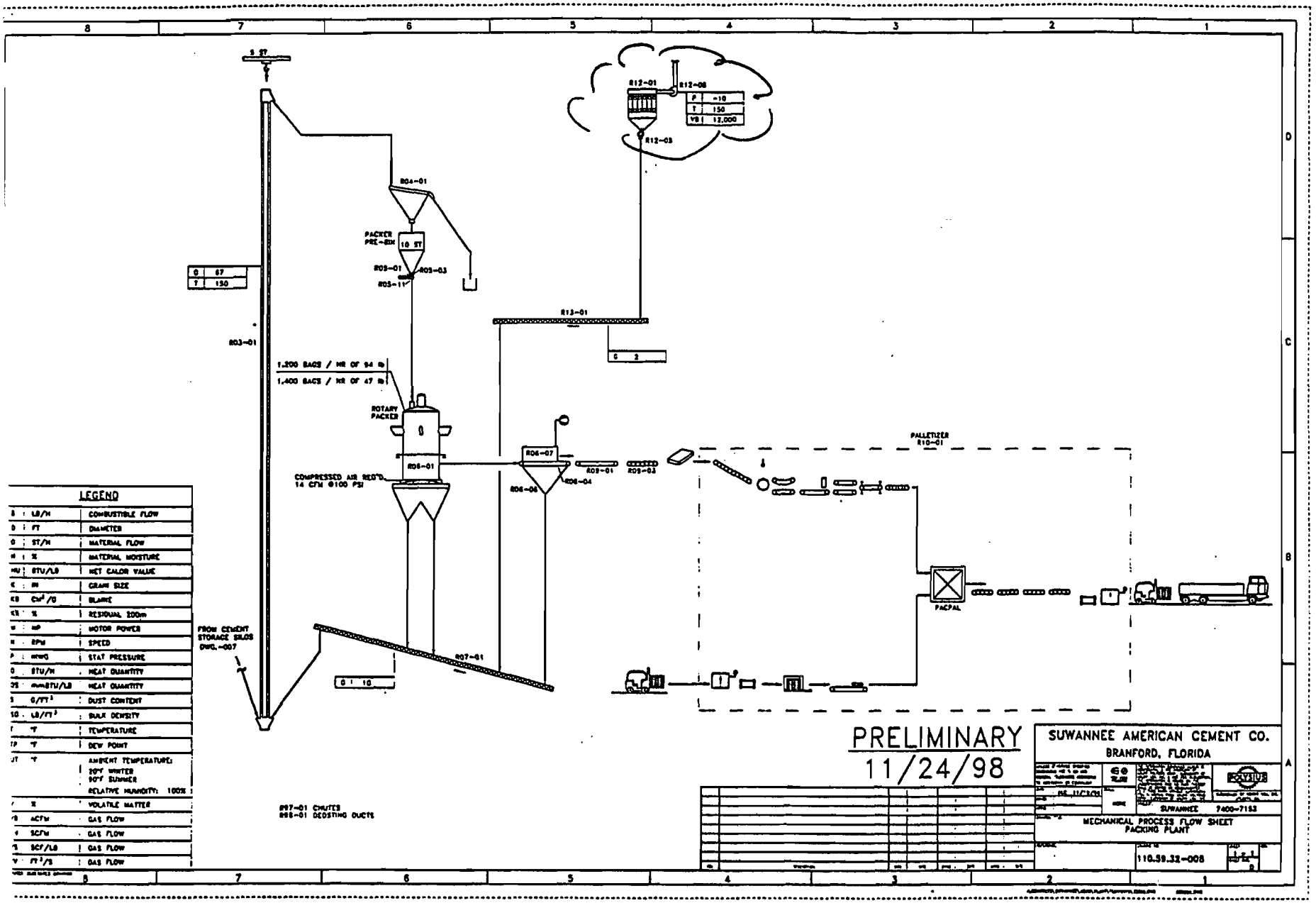

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SUWANNEE AMERICAN CEMENT CO.
BRANFORD, FLORIDA

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SUWANNEE 7400-7153

MECHANICAL PROCESS FLOW SHEET
PACKING PLANT

110.59.32-008

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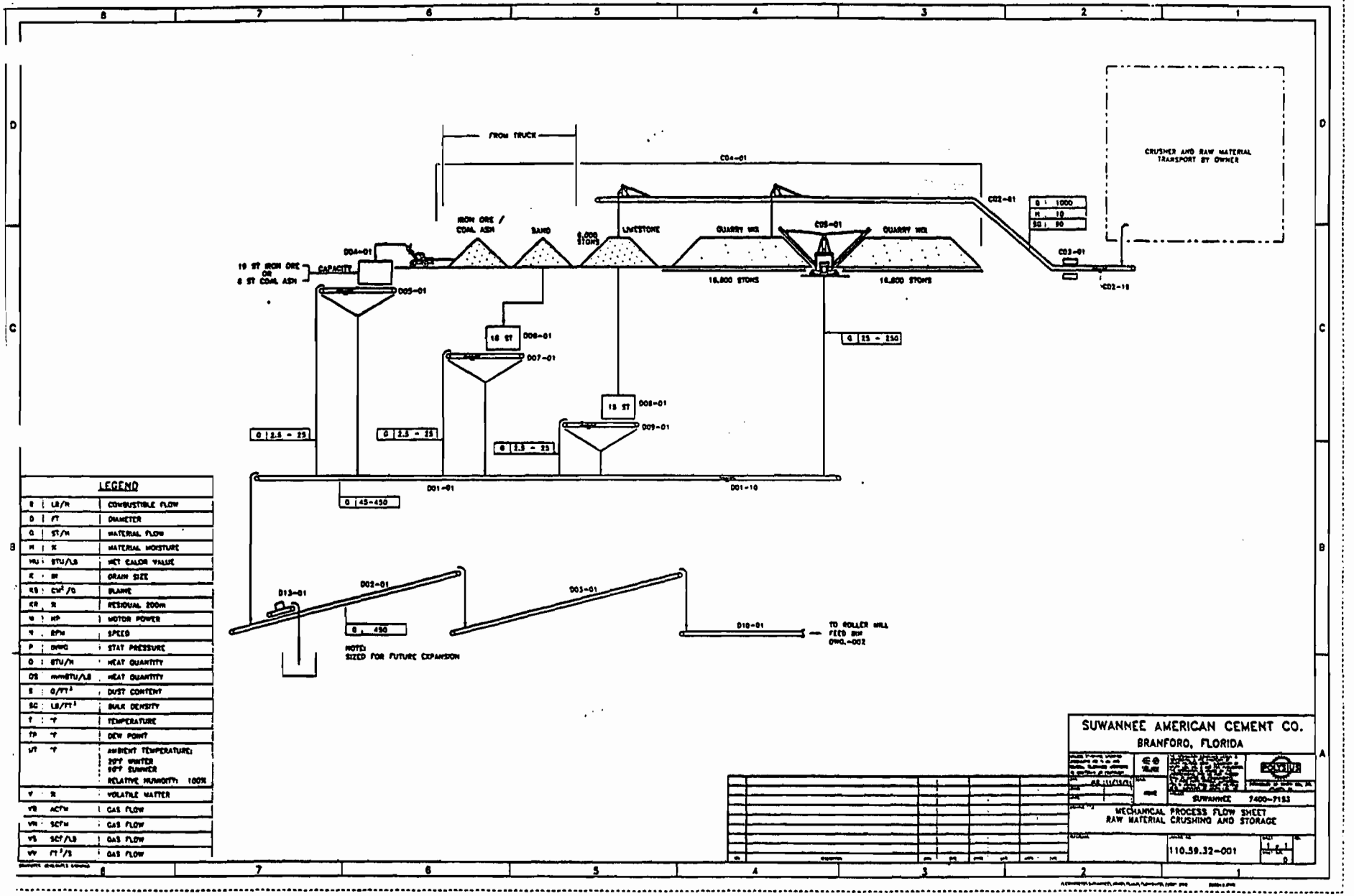
ATTACHMENT 2
Process Flow Diagrams – As Reconfigured



LEGEND		
B	LB/H	COMBUSTIBLE FLOW
D	FT	DIAMETER
G	ST/H	MATERIAL FLOW
M	%	MATERIAL MOISTURE
HHV	BTU/LB	WET CALOR VALUE
K	IN	GRAIN SIZE
BS	CM²/G	BLAINE
ER	%	RESIDUAL 200m
M	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	BTU/H	HEAT QUANTITY
QS	mmBTU/LB	HEAT QUANTITY
S	G/FT³	DUST CONTENT
SG	LB/FT³	BULK DENSITY
T	°F	TEMPERATURE
TP	°F	DEW POINT
UT	°F	AMBIENT TEMPERATURE: 25°F WINTER 90°F SUMMER RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VM	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT³/S	GAS FLOW

SUWANNEE AMERICAN CEMENT CO.
BRANFORD, FLORIDA

SUWANNEE 7400-7153

MECHANICAL PROCESS FLOW SHEET
RAW MATERIAL CRUSHING AND STORAGE

110.59.32-001

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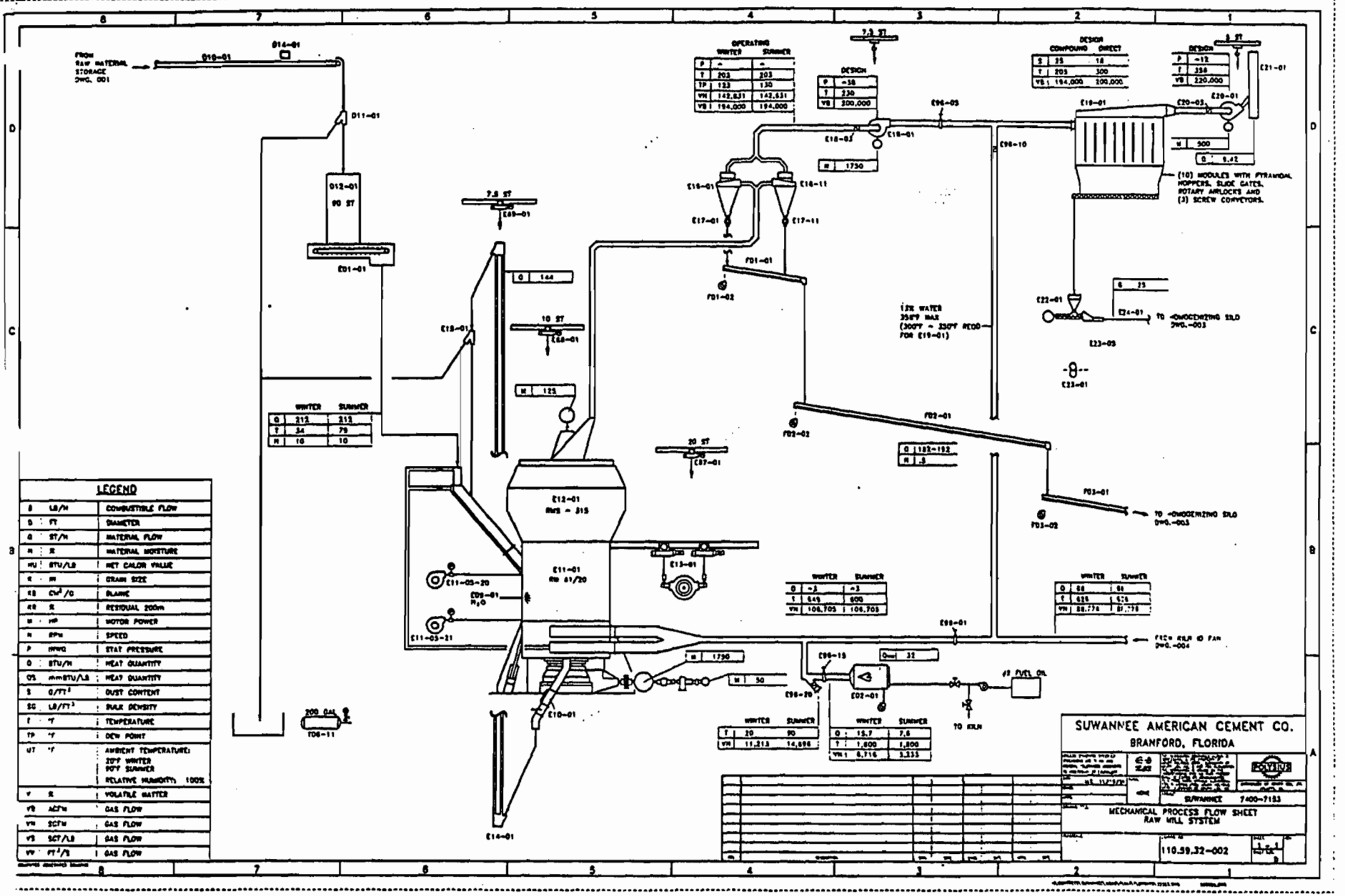

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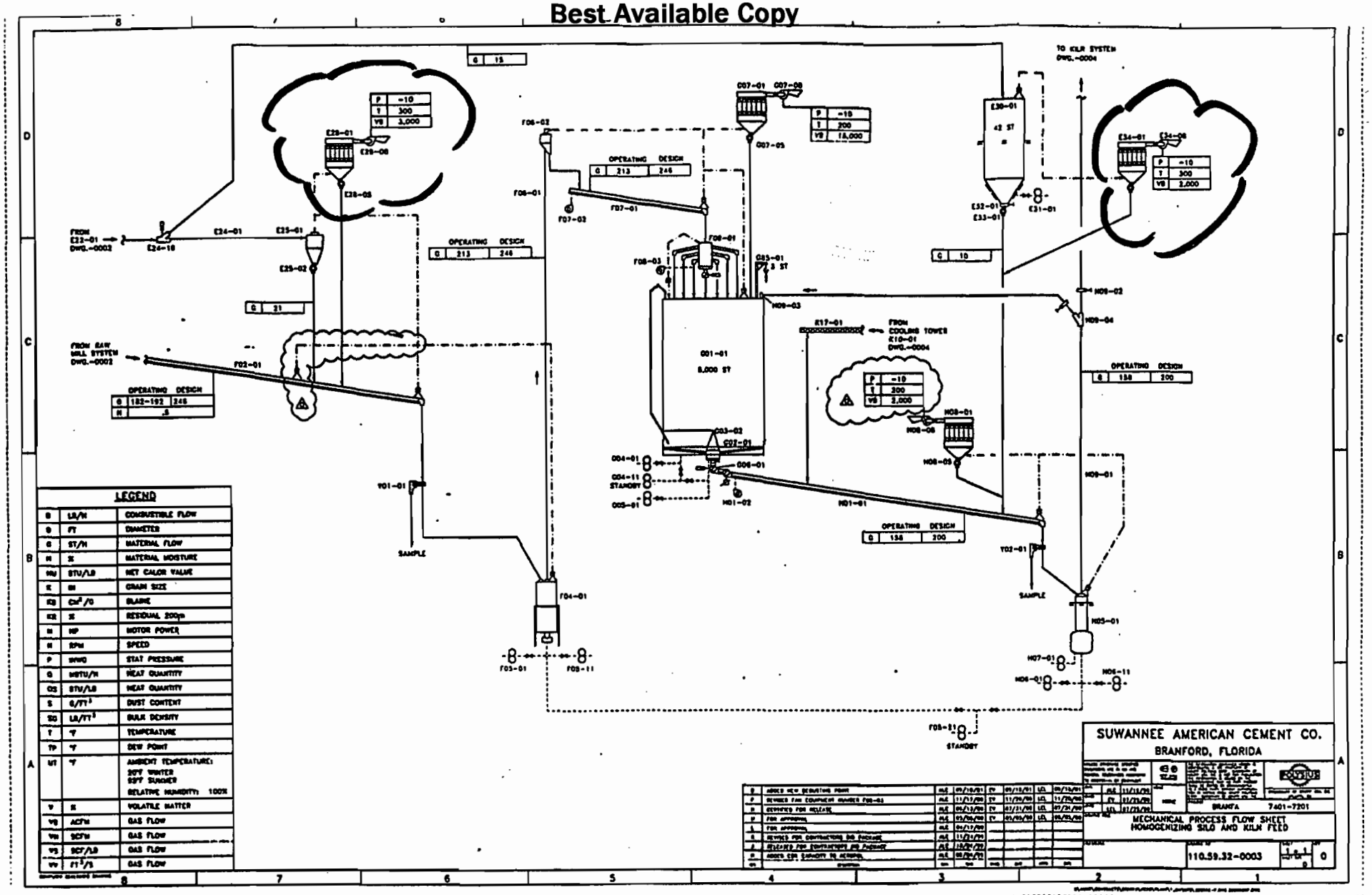

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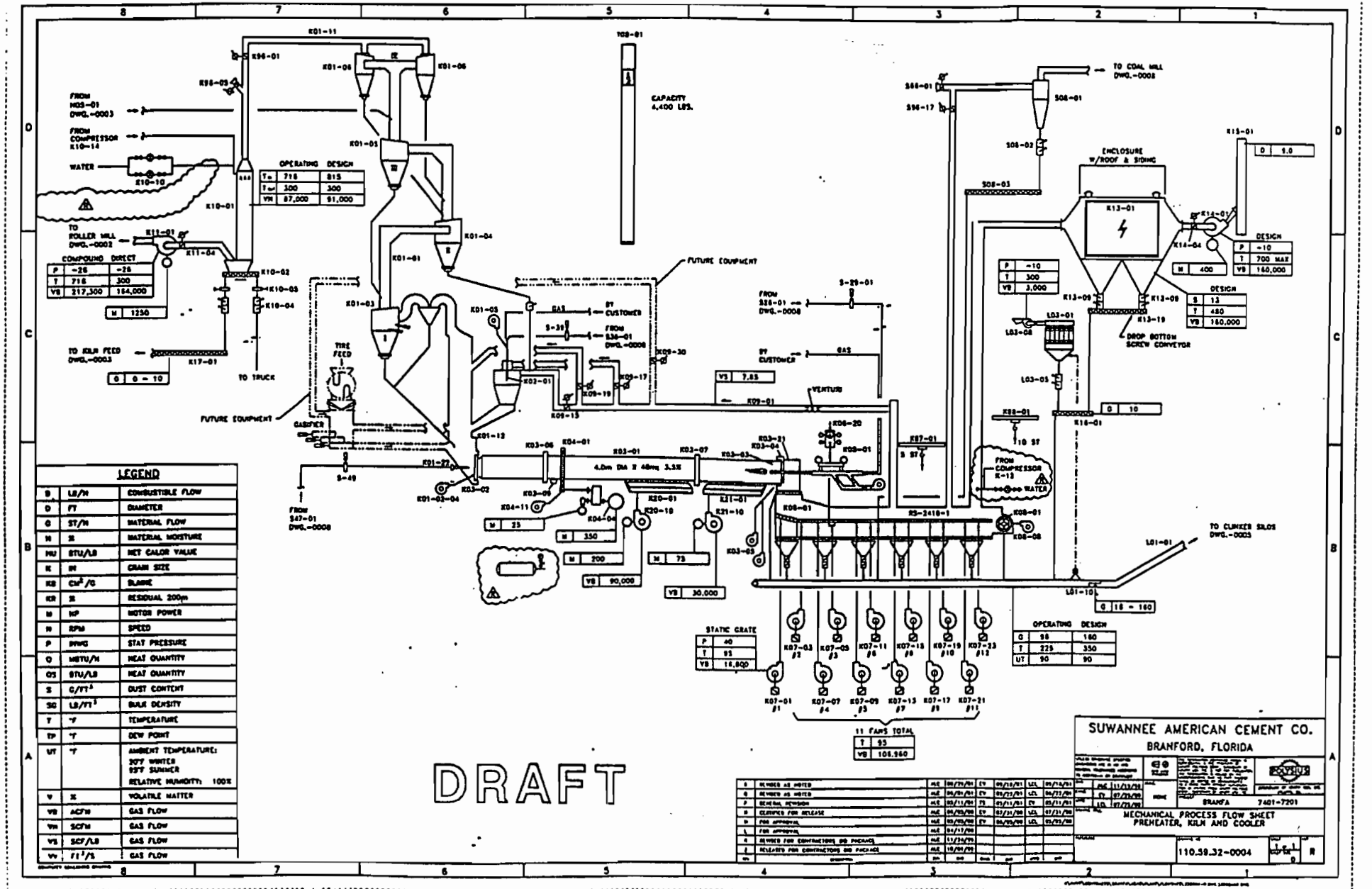

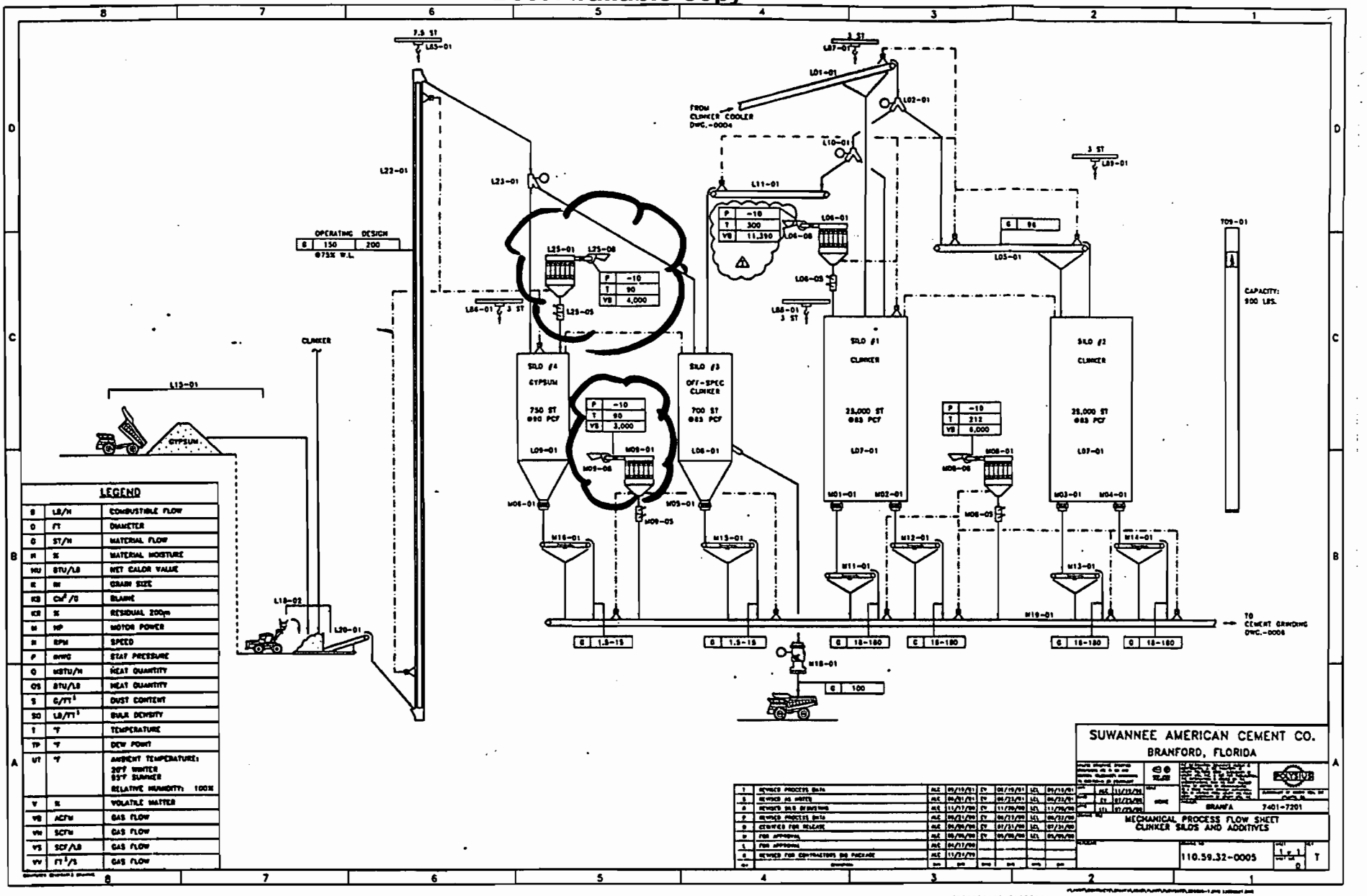

LEGEND		
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G	ST/H	MATERIAL FLOW
M	%	MATERIAL MOISTURE
MU	BTU/LB	WET CALOR VALUE
R	IN	GRAIN SIZE
RB	CM^2/G	BLAINE
RR	%	RESIDUAL 200µm
W	HP	MOTOR POWER
N	RPM	SPEED
P	INWG	STAT PRESSURE
Q	MBTU/H	HEAT QUANTITY
QS	BTU/LB	HEAT QUANTITY
S	G/FT^3	DUST CONTENT
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TP	°F	DEW POINT
UT	°F	AMBIENT TEMPERATURE: 20°F WINTER 93°F SUMMER RELATIVE HUMIDITY: 100%
V	%	VOLATILE MATTER
VB	ACFM	GAS FLOW
VN	SCFM	GAS FLOW
VS	SCF/LB	GAS FLOW
VV	FT^3/S	GAS FLOW

1	REVISED PROCESS DATA	MJC	05/15/01	EV	05/15/01	LCL	05/15/01
5	REVISED AS NOTED	MJC	04/21/01	EV	04/23/01	LCL	04/23/01
4	REVISED BAG DIMENSIONS	MJC	11/17/00	EV	11/20/00	LCL	11/20/00
3	REVISED PROCESS DATA	MJC	05/31/00	EV	06/11/00	LCL	06/11/00
2	CLEARED FOR RELEASE	MJC	04/20/00	EV	07/31/00	LCL	07/31/00
B	FOR APPROVAL	MJC	03/29/00	EV	04/03/00	LCL	04/03/00
A	FOR APPROVAL	MJC	04/17/00				
0	REVISED FOR CONTRACTORS BID PACKAGE	MJC	11/21/99				

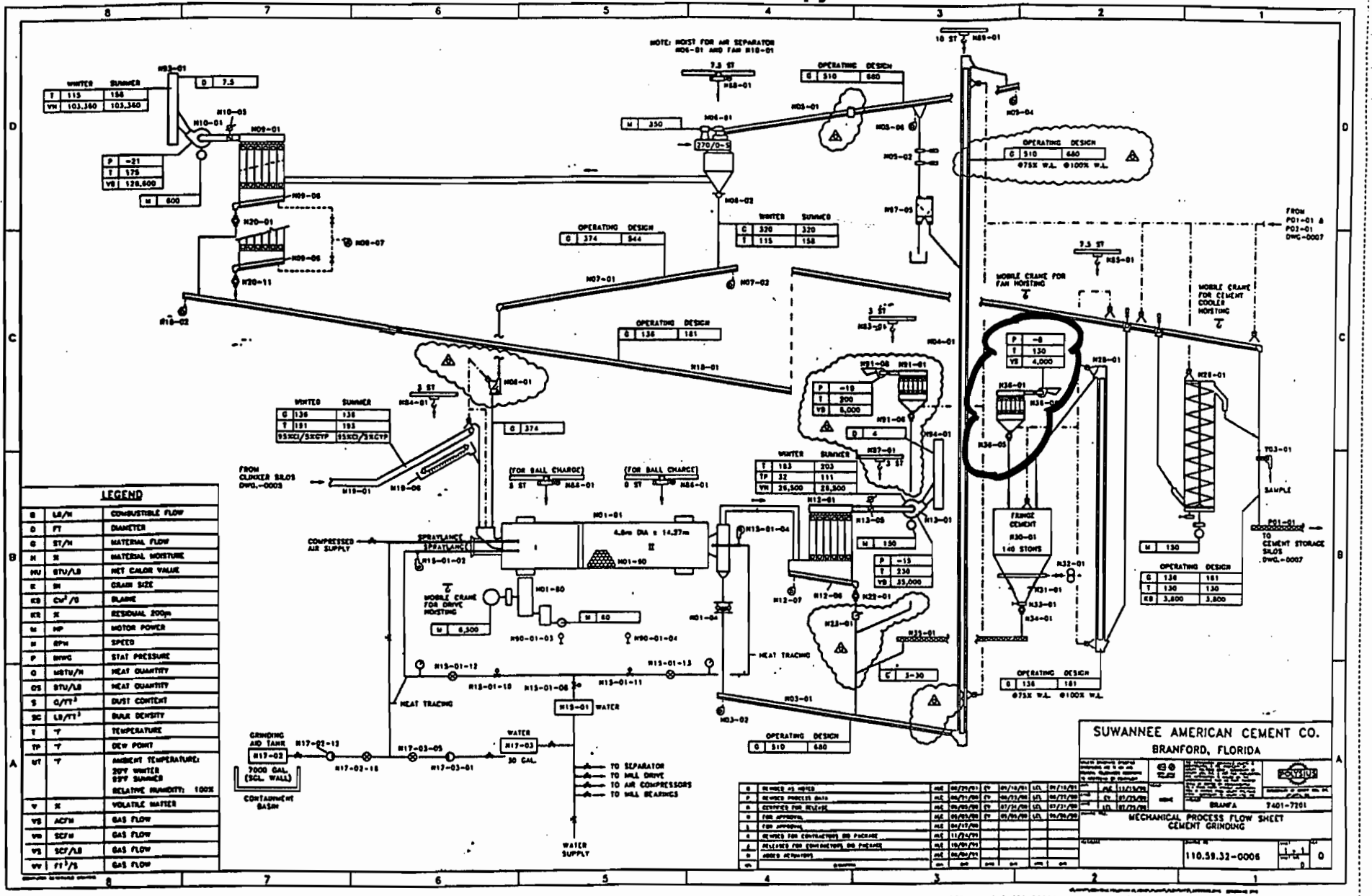
SUWANNEE AMERICAN CEMENT CO.
BRANFORD, FLORIDA

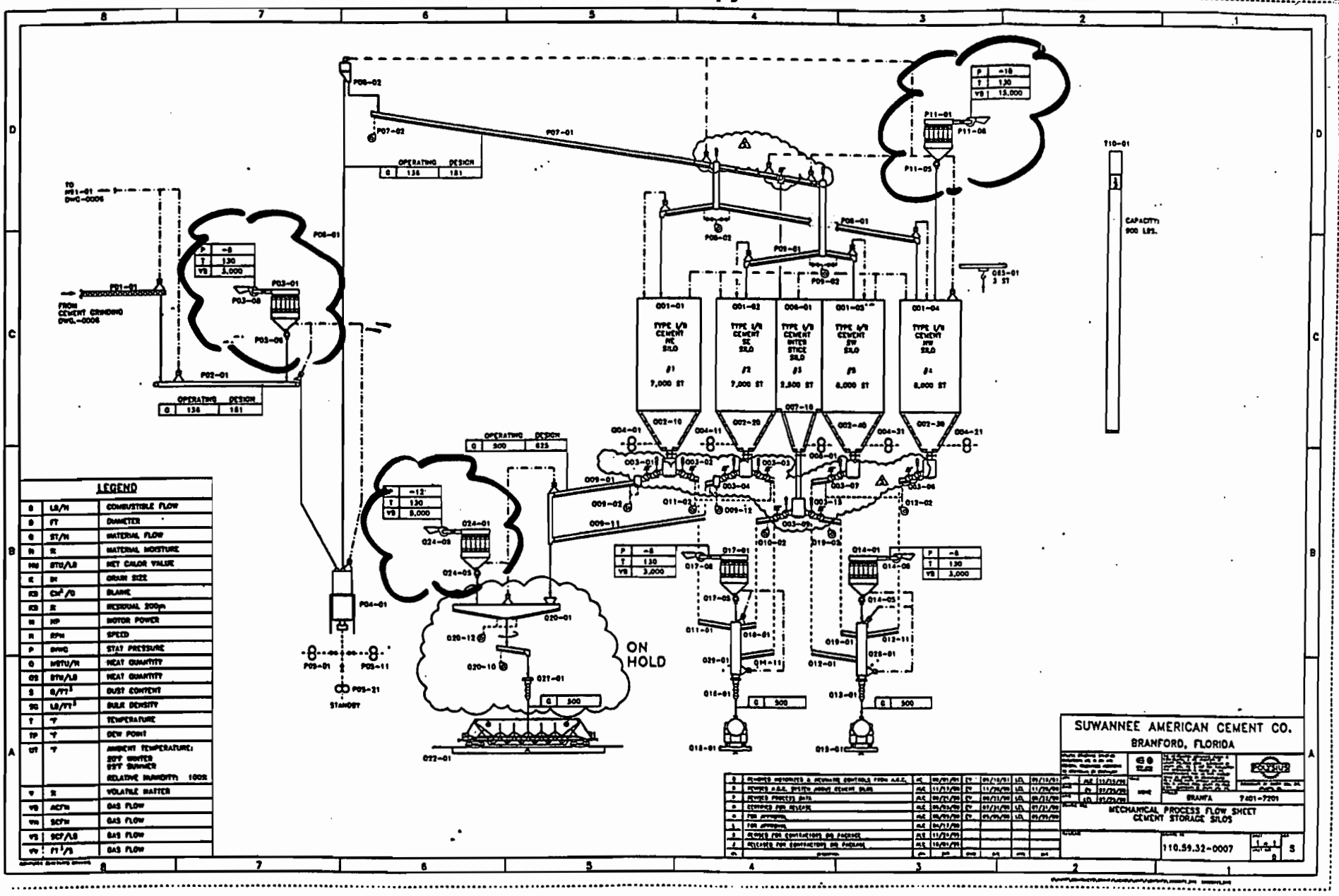
BRANFA 7401-7201

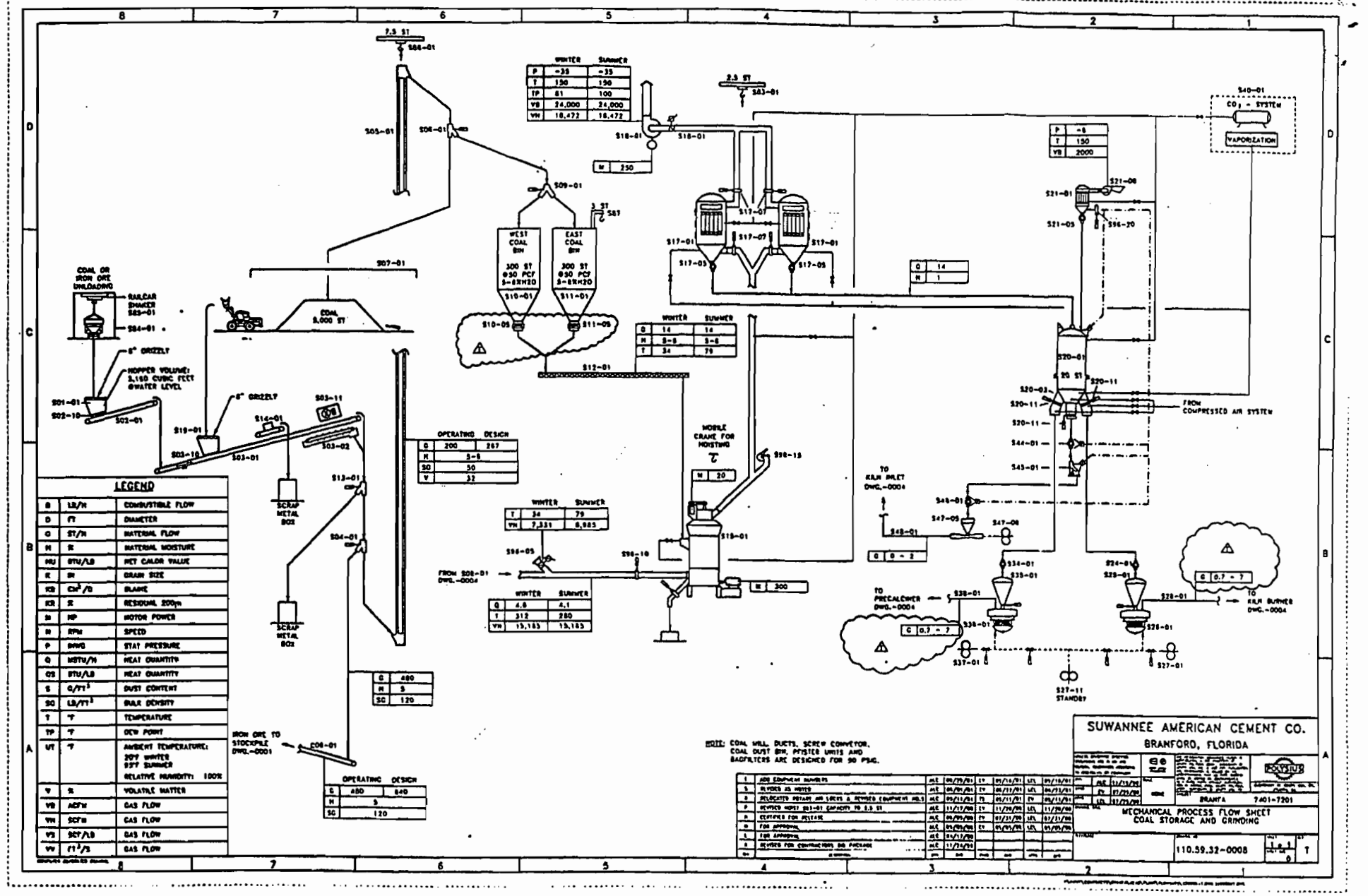
MECHANICAL PROCESS FLOW SHEET
CLINKER SILOS AND ADDITIVES

110.59.32-0005

DRAFT







ATTACHMENT 3
Dust Collector Specifications

SAC Baghoues Specifications & Design Data

Emission Control Unit		Equip. No.	Amerex Model No.	Bag Material	No. of Bags	Bag Size	Bag Area	Cloth Area	Design ACFM	A-C Ratio	Temp. Deg. F	Delta P (-) INW	Stack Dia. '
Kiln/Raw Mill (8 Comps.) *	1	E21-01	RA-35-180-D12	Fiberglass w/SGT	1,440	12" X 35'	109.96	158,337	220,000	1.39	450	12	9.42
Finish Mill, Sepol No.1 (W), **	2	N09-01	RP-12-770 D6	16 Oz. Singed Poly. DD	1540	6" X 12'	18.85	29,028	103,600	3.57	158	21	7.6
Finish Mill, Mill No.2 (E)	3	N12-01	RP-12-420 D6	16 Oz. Singed Poly. DD	420	6" X 12'	18.85	7,917	35,000	4.42	203	15	4
Finish Mill Baghouse No. 3 (S)	4	N91-01	RP-10-72 D6	16 Oz. Singed Polyester	72	6" X 10'	15.71	1,131	6,000	5.31	200	10	
Fringe Cement Silo	5	**N36-01**	RP-10-49 D6	16 Oz. Singed Polyester	49	6" X 10'	15.71	770	4,000	5.20	130	8	
Aeropol @ Homogenizing Silo	6	E28-01	RP-10-36 D6	14 Oz. Singed Nomex	36	6" X 10'	15.71	565	3,000	5.31	300	10	
Off Spec. Feed Handling	7	**E34-01**	RP-10-25 D6	14 Oz. Singed Nomex	25	6" X 10'	15.71	393	2,000	5.09	300	10	
Homogenizing Silo Inlet	8	G07-01	RP-10-182 D6	16 Oz. Singed Polyester	182	6" X 10'	15.71	2,859	15,000	5.25	200	10	
Poldos Blend Silo Outlet	9	H08-01	RP-10-25 D6	16 Oz. Singed Polyester	25	6" X 10'	15.71	393	2,000	5.09	200	10	
Coal Mill No. 1, East	10	S17-01	Merrick	16 Oz.Ept.Singed Ploy.	140	6' X 14'	21.99	3,079	12,500	4.06	150	35	
Coal Mill No. 2, West	11	S17-01	Merrick	16 Oz.Ept.Singed Ploy.	140	6" X 14'	21.99	3,079	12,500	4.06	150	35	
Coal Mill No. 3, South	12	S21-01	RP-12-35 D5	16 Oz. Singed Polyester	35	5" X 12'	15.71	550	2,000	3.64	150	6	
Clinker Cooler Conv./Breaker	13	L03-01	RP-10-36 D6	16 Oz. Singed Polyester	36	6" X 10'	15.71	565	3,000	5.31	300	10	
Clinker Silo, Inlet	14	L06-01	RP-10-140 D6	16 Oz. Singed Polyester	140	6" X 10'	15.71	2,199	6,000	2.73	300	10	
Gyp/OS Clinker Transport	15	**L25-01**	RP-10-49 D6	16 Oz. Singed Polyester	49	6" X 10'	15.71	770	4,000	5.20	90	10	
Clinker Conveyor (South)	16	M08-01	RP-10-72 D6	16 Oz. Singed Polyester	72	6" X 10'	15.71	1,131	6,000	5.31	212	10	
Clinker Conveyor (North)	17	**M09-01**	RP-10-36 D6	16 Oz. Singed Polyester	36	6" X 10'	15.71	565	3,000	5.31	90	10	
Cement Transport Conveyor	18	**P03-01**	RP-10-36 D6	16 Oz. Singed Polyester	36	6" X 10'	15.71	565	3,000	5.31	130	8	
Cement Silo Input	19	**P11-01**	RP-10-182 D6	16 Oz. Singed Polyester	182	6" X 10'	15.71	2,859	15,000	5.25	130	10	
Truck Load-out No. 1 (E)	20	Q14-01	RP-10-36 D6	16 Oz. Singed Polyester	36	6" X 10'	15.71	565	3,000	5.31	130	8	
Truck Load-out No. 2 (W)	21	Q17-01	RP-10-36 D6	16 Oz. Singed Polyester	36	6" X 10'	15.71	565	3,000	5.31	130	8	
Railcar Load-out	22	Q24-01	RP-10-56 D6	16 Oz. Singed Polyester	56	6" X 10'	15.71	880	3,000	3.41	130	8	
				Totals	**4,783**			**217,886**					

The visible emissions (VE) limit on all baghouses is 5%

* 7 Compartments (180 Bags/Compt. = 138,545 ft^2 Cloth Area, 1.59 AC Ratio

** - Two 770 bag units

Emission Point Design Data & Compliance Requirements

Grade EL.' 58

	Emission Control Unit	Equip. No.	Stack or Exist Ht.	Design Parameters ACFM	Temp. F	Delta P (-) INWG	Stack I.D.	Compliance Test Parameters VE	PM	PM_{10}	SO_2	NOx	HCL	CO	Hg	VOC	Dioxin
1	Kiln/Raw Mill Baghouse Stack	E21-01	315	220,000	450	12	9.42	X	X	X	X	X	X (1)	X	X (1)	X	X (2)
2	Clinker Cooler ESP Stack	K15-01	215	160,000	700	10	9	X	X	X							
3	Finish Mill BH Sepol No.1 (W)	N09-01	131	103,600	158	21	7.6	X	X	X							
4	Finish Mill BH-Mill No.2 (E)	N12-01	131	35,000	203	15	4	X	X	X							
5	Finish Mill Baghouse No. 3 (S)	N91-01	47	6,000	200	10		X									
6	***Fringe Cement Bin***	***N36-01***	65	4,000	130	8		X									
7	Aeropol @ Homogenizing Silo	E28-01	56	3,000	300	10		X									
8	**Off Spec. Feed Handling**	***E34-01***	50	2,000	300	10		X									
9	Homogenizing Silo Inlet	G07-01	242	15,000	200	10		X									
10	Poldos Homogenizing Silo Outlet	H08-01	50	2,000	200	10		X									
11	Coal Mill No. 1, East, Combined	S17-01															
12	Coal Mill No. 2, West, Combined	S17-01	15	25,000	150	35		X	X(1)								
13	Coal Mill No. 3, South	S21-01	67	2,000	150	6		X									
14	Clinker Cooler Con./Breaker	L03-01	37	3,000	300	10		X									
15	Clinker Silo, Inlet	L06-01	192	6,000	300	10		X									
16	***Gyp/OS Clinker Transport***	***L25-01***	82	4,000	90	10		X									
17	Clinker Conveyor (North)	M08-01	19	6,000	212	10		X									
18	***Clinker Conveyor (South)***	***M09-01***	10	3,000	90	10		X									
19	***Cement Transport Conveyor***	***P03-01***	54	3,000	130	8		X									
20	***Cement Silo Input***	***P11-01***	195	15,000	130	10		X									
21	Truck Load-out No. 1 (W)	Q14-01	29	3,000	130	8		X									
22	Truck Load-out No. 2 (E)	Q17-01	39	3,000	130	8		X									
23	Railcar Load-out	Q24-01	57	3,000	130	8		X									

Units not reflected in permit

(1) Initiall testing only **(2) Dioxin - Initial & every 30 months - Compound & Direct**

Stack or exist height = (emission point elevation - grade elevation)

Continuous Emission Monitor Certifications	Compliance Opacity	SO_2	NOx	Flow	THC	em	Process CO	O_2
Kiln/Raw Mill Baghouse Stack	X	X	X	X	X	X	X	X
Clinker Cooler ESP Stack	X							
Kiln/Raw Mill Baghouse Inlet	**Temp. F**							
Coal Mill Outlet	**Temp. F**							

Temperature device - quarterly calibration check

Process CO & O_2 monitors do not require quarterly calibration check

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

February 18, 2003

Mr. A. Linero, P.E.
Bureau of Air Regulation
Division of Air Resource Management
Department of Environmental Protection
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Subject: Suwannee American Cement – Branford Cement Plant
Branford, Suwannee County, Florida
Facility ID No. 1210465
Application for Air Construction Permit

Dear Mr. Linero:

This letter transmits four (4) copies of an application for an air construction permit for the Suwannee American Cement – Branford Cement Plant. This application is being submitted to you for processing by the New Source Review Group.

During the final design of the Suwannee American Cement Company (SAC) Branford Plant, changes to preliminary design and/or reconfiguration of the preliminary design have resulted in:

1. For Emissions Unit 002, the replacement of a single emission point for particulate matter emissions by two emission points with the addition of a second fabric filter dust collector to control emissions from the added emission point. Design flow rates and design operating temperatures have also been changed for certain control devices.
2. For Emissions Unit 006, the addition of three new particulate matter emission points with associated fabric filter (baghouse) dust collectors; and
3. the reconfiguration of three other particulate matter emission points and the associated fabric filter dust collectors. Design flow rates and design operating temperatures have also been changed for certain control devices.
4. For Emissions Unit 008, a previously permitted single baghouse is being served by two baghouses with a combined exhaust and a higher flow rate.

The design changes and reconfiguration will result in a net reduction in the design air flow rate from the affected emission units. This will result in a net decrease in the permitted particulate matter emission rate from the affected emission units. The net change in PM emissions from the changes detailed in this application is a decrease of 6.7 tons per year.

Thank you in advance for your review of this application. Please contact me if you have any questions or require additional information.

Sincerely,

Steven C. Cullen, PE
Koogler & Associates

Copy to: George Townsend – Suwannee American Cement

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

Ltr - pls work with Chris and decide if a response is needed.
Howard
2/17/03

Suwannee American Cement Co., Inc.
P.O. Box 410
Branford, FL 32008-0410
(904) 935-0966 • Fax (904) 935-1155

February 10, 2003

Mr. Howard L. Rhodes, Director
Division of Air Resource Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Rhodes:

We are in receipt of your letter dated January 16, 2003, which grants the requested construction permit extension for the Suwannee American Cement (SAC) facility. Our request only addressed an extension of the permit expiration date and we realize that all other permit requirements remain the same and we will fully comply with these requirements.

Experience of Plant Manager:
As to the experience of the plant managers, attached is the resume of Celso A. Martini. Mr. Martini ha approximately 22 years of cement industry experience with 12 years as a plant manager.

Construction Schedule:
Construction at the facility is virtually complete. However, SAC is continuing to evaluate the merits of a tire burning system that may be added in the future. The remaining commissioning and process startup is detailed in the attached Startup Schedule.

Sale or Legal Transfer:
Votarntim Cementos has acquired a fifty (50) percent ownership and management rights of Suwannee American Cement. There will be a change in the corporate status and the corporate officers; however, the corporate name will remain the same. It is uncertain at this time as to whether or not this constitutes a sale or legal transfer. Please notify SAC as to our requirements for notification under the above circumstances.

Continuous Monitoring Data Retrieval System:
The continuous emission monitoring and data retrieval system (CEMS & COMS) has been installed and the system is operational. However, we have yet to electronically verify the data inputs for the baghouse inlet temperature monitor, coal mill exit temperature monitor, kiln feed TPH and clinker production TPH. These inputs will be made operational as the kiln process commissioning is complete and the process is brought on-line. SAC has made arrangements with Bell South to install a dial up line in the Department's Northeast District Office and the computer for data retrieval has been transferred to the District Office. It must be realized at this point the CEM system has not been certified therefore the data will not be valid. Furthermore, there will be many a-typical conditions encountered during process commissioning and star up that may result in erroneous emissions and process inputs, relative to normal operating conditions.

SAC is in the process of selecting a vendor to complete the software and hardware requirements for posting emission data on the Internet.

SAC is well aware of the permit requirements noted in your letter and the body of the permit and will endeavor to comply with all permit requirements on a timely basis. Furthermore, in an additional effort to

insure that compliance-monitoring requirements are achieved, SAC has committed to install continuous opacity monitoring systems (COMS) on the Finish Mill (N12) and Sepol (N09) baghouses in lieu of the requirements of Section III Emissions Units Specific Conditions, 41(3)(e) which requires a daily Method 22 to be conducted on these sources. The opacity monitors have been purchased and SAC has contacted the equipment vendor to provide the associated equipment and software configurations to integrate the addition opacity monitors into the existing CEM system.

Should you have any question and/or comments concerning this notification or you require additional information, please contact me or George Townsend at (386) 935-5014).

Respectfully,

Celso A. Martini, Plant Manager

pc: George Townsend
Tom Messer
John Koogler
Christopher Kirts, DEP

RÉSUME

1 – PERSONAL INFORMATION

Please fill in without any abbreviation

Name: CELSO ANTONIO MARTINI

(full name, as stated in the passport)

Date of birth: _19_/__02_/__57____ (Day / Month / Year) Nationality: BRAZILIAN

Place of birth: LAGOA VERMELHA (City) RIO GRANDE DO SUL (State) BRAZIL (Country)

Present residence: RUA MOREIRA CÉSAR, Nº 39, APTO 42, SOROCABA, CEP 18010-010, SÃO PAULO , BRAZIL.

(nº street, apt, city, state, zip code, country)

Phone nº: 15 231-9315 Fax nº: _____ E-mail: mcelsom@directnet.com.br

Marital Status: Married Profession: Engineer

Nº of passport: C G 622128 Expires: 06 / 06 / 2005 (Day / Month / Year)

2 – PARENTAGE

Father's name: ANTONIO MARTINI
(complete name – do not abbreviate)

Nationality: BRASILEIRO

Mother's name: CAROLINA FÁBRIS MARTINI
(complete name – do not abbreviate)

Nationality: BRASILEIRA

3 – EDUCATION

3.2 – UNIVERSITY

3.2.1

School's full name: Universidade Federal do Parana

City: Curitiba. Country: Parana

Period: from 1976 to 1982 Course taken: Chemestry Engineering

---

3.3 – POSTGRADUATE COURSES

3.3.1

School's full name: Escola de Administracao de Empresas de São

City: São Paulo Country : São Paulo.

Period: from 1999 to 2000 Course taken: MBA – Gestao Empresarial

---

4 – PROFESSIONAL ACTIVITIES

· Please inform ALL professional experience, since your graduation, or even before if it is relevant to your functions in Brazil. If you need more pages, please make copy of the last sheet.

4.1

Company: Cia de Cimento Portland Itau
(complete name)

Adress: Bairro Tacanica, s/n, Itaperussu, Parana
(nº street, apt, city, state, zip code, country)

I) Period: from; 09/1980 to 10/1981 Function: Trainee.

Detail the attributions and responsibilities of this function:

Learning the quality standards of products. Learning and accompanying the cement processes of production and understanding the phases of extraction and benefaction of raw materials, grinding and behavior of raw meal, kilns and clinquerization sytems, cements mills and grinding system.
Learning about other input components, semi-finished and finished products.

II) Period: from ; 10/1981 to 04/1982 Function: Chief of Chemistry Engineering

Detail the attributions and responsibilities of this function:

Responsible for the plans optimization process:Crushing, Grinding, Burning, and Quality. Evaluating and implementing new technologies, dimensioning and rationalizing resources and processes, seeking new applicative alternatives, always maintaining the quality standard of products.
Realization off the thermal and mass balances for the optimization of this process.

III) Period: from: 04/1982 to 02/1985 Function: Production Coordinator

Detail the attributions and responsibilities of this function:

Responsible for all objectives of cement production are met for one industrial plant, through planning, administration and control of Fabrication, Quality Control, Hygiene / Medicine and Environmental and Work Safety processes, with the objective of complying with the sales forecasts

Responsible for the cost minimization, evaluating and implementing new technologies, dimensioning and rationalizing resources and processes, seeking new applicative alternatives, always maintaining and improvement the quality standard of products

4.2

Company: S.A Industrias Votorantim, Fabrica de Cimento Rio Negro
(complete name)

Address: Av. Senador Jose Ermirio de Morais, Cantagalo, CEP 10010-010, RJ, Brasil

(nº street, apt, city, state, zip code, country)

I) Period: from 03/1995 to 08/1986 Function: Control Quality Coordinator

Detail the attributions and responsibilities of this function:

Responsible for the extraction and benefaction of raw materials necessary to cement production are made, accompanying and controlling works according to planning of mine work and pre-established specifications, as well as the prospection, and making available the mineral resources.
Responsible for the quality standard of products, accompanying the processes of analyses and understanding the phases of extraction of raw materials and other input components, semi-finished and finished products, assuring that all clients received products with assurance quality.

II) Period: from 11/1986 to 01/1997 Function: Process Engineer

Detail the attributions and responsibilities of this function:

Responsible for the quality standard of products, in the 7 industrials units.

Responsible for the quality standard of products, accompanying the processes of analyses and understanding the phases of extraction of raw materials and other input components, semi-finished and finished products.

Responsible for the definition and establishment of quality goals and politics for the 7 Industrials Units, as well as giving technical support and suggestions for the definition of the standards Company's guidelines.

III) Period: from 05/1990 to 01/1994 Function: Plant Manager - Fabrica Moagem Volta Redonda.

IV) Period: from 01/1994 to 10/2001 Function: Plant Manager - Fabrica de Cimento Santa Helena e Salto de Pirapora.

V) Period: from 10/2001 to 09/2002 Function: Plant Manager Fabrica de Cimento Portland Itau

Detail the attributions and responsibilities of this functions:

Assuring that the objectives of cement production are met for one industrial plant, through planning, administration and control of Mining, Fabrication, Quality Control, Maintenance, Financing Administration, Hygiene / Medicine and Environmental and Work Safety processes, with the objective of complying with the sales forecasts.

Assuring that the extraction and benefaction of raw materials necessary to cement production are made, accompanying and controlling works according to planning of mine work and pre-established specifications, as well as the prospection, and making available the mineral resources.

Administrating the plans for cost minimization, evaluating and implementing new technologies, dimensioning and rationalizing resources and processes, seeking new applicative alternatives, always maintaining the quality standard of products.

Responding for the quality standard of products, accompanying the processes of analyses and understanding the phases of extraction of raw materials and other input components, semi-finished and finished products.

Responsible for the definition and establishment of industrial goals and politics for the Unit, as well as giving technical support and suggestions for the definition of the Company's guidelines.

Responding for the conservation and improvement of equipment and other installations for the technological maintenance of the industrial plant, evaluating studies of technical and economical feasibility's, new projects, investments, etc, as well as for programs of mechanical, electrical and instrumental maintenance, aiming at the perfection and efficiency of production processes.

Assuring that the administrative activities are performed, accompanying their compliance with the pertinent norms and technical / legal procedures.

Administrating the Unit's projects of know-how amelioration, directing updating programs according to the technologies to be implemented, as well as scattering technical knowledge.

Keeping contact with and representing the Company before entity and governmental classes, etc, with the objective of maintaining the institutional image together with the external community.

Responding for complying with the standards related to occupational hygiene and medicine, work safety and environment, through implementation and control of adequate procedures as per the need of each locality, in compliance with pertinent legislation.

Providing administrative information about the Unit's activities, clearing technical questions for future decisions to be made by the superiors

Responsible for the improvement the all Excellence Operational Systems Management: Quality System, based on ISO 9000 standards; Maintenance System; Total Productive Maintenance (TPM); Safety, Health and Environmental System (NOSA); Routine Management; Six Sigma Projects; Cost and Budget System.
Assuring resources, knowledge and development for all the people.

After the approval of the work permit, the visa will be sent to the Brazilian Consulate in the jurisdiction of your residence, where you have been living for the latest 12 months, OR in the country of your nationality. Please inform below which Brazilian Consulate the visa should be sent to:

City: _____ Country: _____

SUWANNEE AMERICAN CEMENT START UP SCHEDULE

Area	Green tag	Inspection and Clean up	Comissionning	Start up Schedule
Water Treatment System	10/3/2002	11/10/2002	11/12/2002	11/12/2002
Limestone/Clay Storage	11/29/2002	12/3/2002	12/5/2002	12/18/2002
Control Panel (Polcid)	10/31/2002	10/31/2002	11/30/2002	11/30/2002
CNA	10/31/2002	12/20/2002	1/25/2003	1/30/2003
Raw Mill	11/7/2002	11/18/2002	12/7/2002	1/20/2003
Blend Silo	11/18/2002	11/18/2002	11/25/2002	12/10/2002
Preheater Tower	11/29/2002	12/10/2002	12/10/2002	1/27/2003
Kiln	12/16/2002	12/30/2002	1/14/2003	2/8/2003
				2/10/2003
Conditioning Tower	11/29/2002	12/10/2002	12/20/2002	1/24/2003
Coal Mill	11/29/2002	12/5/2002	12/16/2002	2/6/2003
Cooler/ESP	12/6/2002	12/16/2002	12/30/2002	2/10/2003
Coal Feeding System(Pfister)	11/29/2002	12/16/2002	12/20/2002	2/10/2003
Clinker Conveying/Storage	12/6/2002	12/16/2002	12/20/2002	2/10/2003
Finish Mill	11/29/2002	1/6/2003	1/25/2003	2/17/2003
Cement Silo/Loading System	12/6/2002	1/10/2003	1/25/2003	2/18/2003

CEM Certification & Compliance Testing Schedule

This is a tentative schedule and may vary based actual process startup and sampling times

Day	Date	
1 thru 8	Tuesday 01-Apr-03 thru Monday 08-Apr-03	Initial visit/survey sampling locations Initiate seven (7) day drift test of the CEM system
9 thru 13	Tuesday 14-Apr-03 thru Friday 18-Apr-03	Certification of kiln/raw mill stack CEM (SO_2, NO, NO_2, O_2, flow), process O_2 & CO, and opacity monitor Certification of the clinker cooler stack opacity monitor and the coal mill outlet temperature monitor.
14 thru 27	Monday 23-Apr-03 thru Friday 09-May-03	Mass emission testing at the kiln/raw mill stack - PM/PM_{10}, SO_2, CO, VOC, Dioxin (2) and mercury (informational) HCL emission test at the kiln/raw mill stack, informational/MACT major - minor determination Visible emission observation on the kiln stack Coal Mill PM & PM_{10} Finish Mill 1 & 2 PM/PM_{10}
28 thru 35	Monday 14-May-03 thru Friday 23-May-03	Visible Emission observations:

Finish Mill, Sepol No.1 (W), **	N09-01
Finish Mill, Mill No.2 (E)	N12-01
Finish Mill Baghouse No. 3 (S)	N91-01
Fringe Cement Bin	**N36-01**
Aeropol @ Homogenizing Silo	E28-01
Off Spec. Feed Handling	**E34-01**
Homogenizing Silo Inlet	G07-01
Poldos Blend Silo Outlet	H08-01
Coal Mill No. 1, East	S17-01
Coal Mill No. 2, West	S17-01
Coal Mill No. 3, South	S21-01
Clinker Cooler Conv./Breaker	L03-01
Clinker Silo, Inlet	L06-01
Gyp/OS Clinker Transport	**L25-01**
Clinker Conveyor (South)	M08-01
Clinker Conveyor (North)	**M09-01**
Cement Transport Conveyor	**P03-01**
Cement Silo Input	**P11-01**
Truck Load-out No. 1 (E)	Q14-01
Truck Load-out No. 2 (W)	Q17-01

Fugitive Points.

Primary Crusher
Tripper Car RMS
Tripper Car Sand Storage
Sand Hopper (Truck Dump)
Coal Storage (Discharge Pipe)

Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

February 4, 2003

HAND DELIVERY / FEDEX
VIA CERTIFIED-RETURN RECEIPT MAIL AND FACSIMILE

Mr. George Townsend
Suwannee American Cement Company, Inc.
PO Box 410
Branford, Florida 32008

Dear Mr. Townsend:

Permit Number 1210465-001-AC, PSD-FL-259
Suwannee American Cement Company, Inc.
Suwannee County - Air Compliance

This is in response to your letter of this date concerning startup of Suwannee American Cement Company's Kiln system on February 10.

Please be advised that the subject permit requires:

> "... all of the CEMS are installed, recording, and continuously transmitting available data to the Department's Northeast District Office."

This requirement has not been met to date. Startup without meeting this requirement will constitute a permit violation.

If you have any question concerning this request, please contact me at the above address or telephone (904) 807-3235.

Sincerely,

Christopher L. Kirts.
Air Program Administrator

Cc: Howard Rhodes
Alvaro Linero
Cameron Cooper

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 16, 2003

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. 1210465-003-AC (PSD-FL-259B)
Cement Plant – Branford, Suwannee County, Florida

Dear Mr. Martini:

The Department reviewed a request submitted by Koogler and Associates dated December 12, 2002, to extend the expiration date of the construction permit for the above referenced facility until May 30, 2006. Per Rule 62-4.080, F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

The requested date is more in line for a new application for a greenfield project. Physical construction required to make cement is approaching completion. We have previously discussed this matter with the former plant manager, your consultant, and legal representatives. They, and we, understood that an extension would be on the order of one year. We have already received notification from Suwannee American Cement (SAC) of startup for a number of the units on-site. We understand that SAC plans to begin making clinker sometime during the first three months of this year.

We conclude that by June 30, 2004, Suwannee American will have completed the physical construction necessary to make cement, conducted the performance and compliance testing, and submitted a Title V operation permit application representative of the as-built plant. Further modification, such as addition of a tire handling system or gasification chamber will require additional permitting if not completed by that date.

The Department has been expecting, but has not received, details of the Continuous Monitoring Retrieval System required by Section III, Specific Condition 9 of the permit. This permit condition has been clarified to provide the Department the reasonable assurance of compliance it must have in order to grant the extension.

The existing permit is hereby modified as follows:

COVER PAGE OF PERMIT - EXPIRATION DATE

The expiration date is hereby extended from May 30, 2003 to June 30, 2004.

SECTION II. SPECIFIC CONDITION 6

Expiration: This air construction permit shall expire on ~~May 30, 2003~~ June 30, 2004. The permittee, for good cause, may request that this construction and PSD permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation prior to 60 days before the expiration of the permit. [Rules 62-210.300(1), 62-4.070(4), 62-4.080, and 62-4.210, F.A.C]

PSD Expiration: Approval to construct shall become invalid if construction is not commenced within 18 months after receipt of such approval, or if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.
[40 CFR 52.21(r)(2)]

BACT Determination: In conjunction with extension of the 18 month periods to commence or continue construction, or extension of the permit expiration date, the permittee may be required to demonstrate the adequacy of any previous determination of Best Available Control Technology (BACT) for the source. [40 CFR 52.21(j)(4)] The Department will not require such a demonstration of adequacy unless an extension is requested beyond June 30, 2004.

SECTION II – SPECIFIC CONDITION 30

Experience of Facility Personnel: The owner shall staff the facility with trained and experienced managers, supervisors and operators. Trained supervisors and operators shall be on duty at the plant at all times. The plant manager shall have at least 10 years of cement industry experience and shall also have experience as a cement plant manager. The qualifications of the plant manager with regard to cement industry and cement plant management experience shall be provided to the Department by February 15, 2003. This information shall be provided to the Department for any future plant manager changes within 30 days after the change.
[Rule 62-4.070(3), F.A.C.].

SECTION II – SPECIFIC CONDITION 31 (NEW)

Construction Schedule: By February 15, 2003, the owner or operator shall identify each remaining activity, including estimated start and finish dates, that will be conducted through June 30, 2004. These activities shall include additional construction, startup and shakedown, performance and emission compliance testing, submittal of Title V Operation Permit application, etc. [Rule 62-212.400(5)(h)2., F.A.C. – Permit Application Information Required – "A detailed schedule for construction of the facility."]

SECTION II – SPECIFIC CONDITION 32 (NEW)

Sale or Legal Transfer: Within 30 days after sale or legal transfer of this facility, an "Application for Transfer of Permit" must be submitted to the Department. This form must be completed with the notarized signatures of both the permittee and the proposed new permittee. For air permits, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7) shall be submitted. [Rule 62-4.120., F.A.C., Transfer of Permits]

SECTION III - SPECIFIC CONDITION 9

Continuous Monitor Data Retrieval System: The owner or operator, at its sole expense and prior to the Anticipated Date of Commission (initial startup of the kiln), as Notified in accordance with Permit Modification No. 1210465-002-AC, Section II, Specific Condition 27A, shall:

(a) insure all of the CEMS are installed, operational, recording and continuously transmitting available data to the Department's Northeast District Office; and

(b) provide ~~to the Department,~~ at the Department's ~~chosen site~~ Northeast District Office, one personal computer equipped with a modem and software, and corresponding hardware at the owner's facility, to enable the Department at any time to connect to the CEM system and allow the Department access to data from the continuous monitors for SO_2, NOx and VOC expressed in terms of the units of the emission limiting standards of this permit, data from the continuous opacity monitor systems, and data from the monitor for the temperature at the inlet to the in-line kiln/raw mill particulate matter control device; The computer and software shall provide the Department with a numerical and graphical display of these data in real time and pursuant to the averaging requirements of this permit, and shall allow the Department to electronically store and retrieve such data, and print such data as the Department may select. The software shall also allow the Department to review the exception log for any previous period of time accessible through the CEMS data management system.

The owner or operator shall also, at its sole expense, provide for 24 months after initiating plant operation software development support at the Department's chosen site to allow the Department to specify and receive timely programming of the data retrieval software to allow the Department to change the format and provide additional formats of the reports it receives.

Within 60 days after achieving the maximum production rate at which the plant will be operated, but not later than 180 days after initial startup of the kiln, ~~T~~ the owner or operator shall also at its sole expense~~, if technically feasible,~~ post the above data on a real-time basis, as averaged pursuant to the averaging times for each applicable pollutant specified in Section III, Specific Condition 15, to an Internet site accessible to the Department and public at any time via standard Internet browser software.
[Rule 62-4.070(3), F.A.C.]

By February 15, 2003, the owner or operator shall provide to the Department the schedule and design parameters for all systems described above, such as scoping papers, selected systems, implementation plans, example data screens, report lists, etc. [Rules 62-4.070(3), 62-4.080(3) and 62-212.400(5)(h)2, F.A.C.]

SECTION III - SPECIFIC CONDITION 19

CEM System Requirements: The selection, installation, calibration, maintenance, operation, record keeping, and reporting of the CEM system shall comply with the requirements of 40 CFR 60.7 and 60.13, and 40 CFR 60 Appendix B, Performance Specifications, and Appendix F, Quality Assurance Procedures. [Rules 62-4.070(3), 62-210.800 and 62-297.520, F.A.C., and BACT] All CEM systems (regardless of requirement authority) shall be installed, operational, recording and continuously transmitting available data prior to the initial startup of the kiln and shall be certified within 60 days after achieving the maximum production rate at which the plant will be operated, but not later than 180 days after initial startup.

[Note: 40 CFR 60 Appendix B and Appendix F have been omitted for brevity. See the Code of Federal Regulations for the text of these sections.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

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

Howard L. Rhodes, Director
Division of Air Resources
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 1/17/03 to the person(s) listed:

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

Clerk Stamp

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

Victoria Gibson / January 17, 2003
(Clerk) (Date)

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

624-00-01
January 2, 2003

Mr. Al Linero
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: ***Suwannee American Cement Company, Inc.***
Permit No. 1210465-001-AC/PSD-FL-259
Fee For Air Construction Permit Extension

Dear Al:

Pursuant to a recent request from your office, please find attached hereto a check in the amount of $50.00, payable to the Florida Department of Environmental Protection. The check is for the processing fee for extending the above captioned air construction permit, as requested in my letter to you dated December 13, 2002.

If there are any questions regarding this matter, please do not hesitate to contact me at 352-377-5822 or at Jkoogler@kooglerassociates.com.

Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK/jhm
Enclosure

cc: Chris Kirts, FDEP, Jacksonville
Celso Martini, SAC
George Townsend, SAC

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ▪ FAX/377-7158

624-00-01
December 13, 2002

Mr. Al Linero
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Subject: ***Suwannee American Cement Company, Inc.***
Permit No. 1210465-001-AC/PSD-FL-259
Air Construction Permit Extension

Dear Mr. Linero:

The above-captioned air construction permit issued to the Suwannee American Cement Company, Inc. (SAC) on June 1, 2000, has an expiration date of May 30, 2003. By this letter, we are requesting that the expiration date of the permit be extended until May 30, 2006. This request is made pursuant Condition No. 6 of Section II, *Facility-wide Specific Conditions* of the above-captioned permit and Rules 62-4.070, 62-4.080, 62-4.210 and 62-210.300(1), F.A.C.

The attached construction schedule (dated November 24, 2002) shows that the anticipated startup of the kiln is now projected to be in early 2003. The permit extension through May 30, 2006 will allow, with a reasonable margin of safety, for the startup and debugging all elements of the plant, performance tests to demonstrate that the plant can operate at permitted capacity, emission testing to demonstrate compliance with all emission limiting standards of the above-captioned permit, the preparation and submission of a complete Title V Air Operating Permit to the FDEP Northeast District Office, and the time necessary for SAC to evaluate and install a tire burning system. The requested extension will avoid the possibility of missed deadlines and the urgent and perhaps untimely scheduling of activities and/or testing to comply with a more restrictive permit expiration date.

The plant is being constructed as described in documents submitted to the Department in support of the Air Construction Permit and as described in the Department's *Best Available Control Technology Determination.* Particulate matter (PM and PM10) emissions from the kiln/raw mill and from all other applicable material process, handling and/or transfer points except the clinker cooler, will be controlled by fabric filters (baghouses) which were determined to be *Best Available Control Technology* (BACT). The PM/PM10 emissions from the clinker cooler will be controlled by electrostatic precipitator which was determined to be BACT for this emission unit. The sulfur dioxide emissions from the kiln/raw mill will be controlled by process absorption inherent to dry process Portland cement plants operating in Florida. The nitrogen

oxides (NO_X) and carbon monoxide (CO) will be controlled by process design and work practice standards. The process design includes multi-stage combustion with a separate line combustion chamber incorporated specifically to minimize NO_X emissions . This design was determined to be BACT and it is the most advanced process designed employed for NO_X and CO control in the State of Florida. Based on the plant design, the emission control measures that will be employed as BACT, the experience of the plant staff, the inherent characteristics of the raw materials that will be used at the plant, and the demonstrated compliance of similarly designed and operating plants in Florida, there is reasonable assurance that the plant will not discharge, emit or cause pollution in contravention of Department standards or rules.

This request for a permit extension complies with all Department requirements and rules. The request was made in a timely manner and the requested time extension is reasonable considering the current construction schedule (attached), the tasks which must be completed in order to have a complete Title V Permit Application in the hands of the Department's Northeast District Office prior to the expiration of the construction permit and the evaluation of the tire derived fuel system. Furthermore, there is all reasonable assurance that the plant, once operating, will comply all permit requirements based on the installation and employment of pollution control measures established as BACT and on the demonstrated compliance of similar new dry process precalciner Portland cement plants operating in Florida.

If there should be additional information required or if there are questions regarding the information provided, please do not hesitate to contact me. Thank you in advance for your consideration of this request.

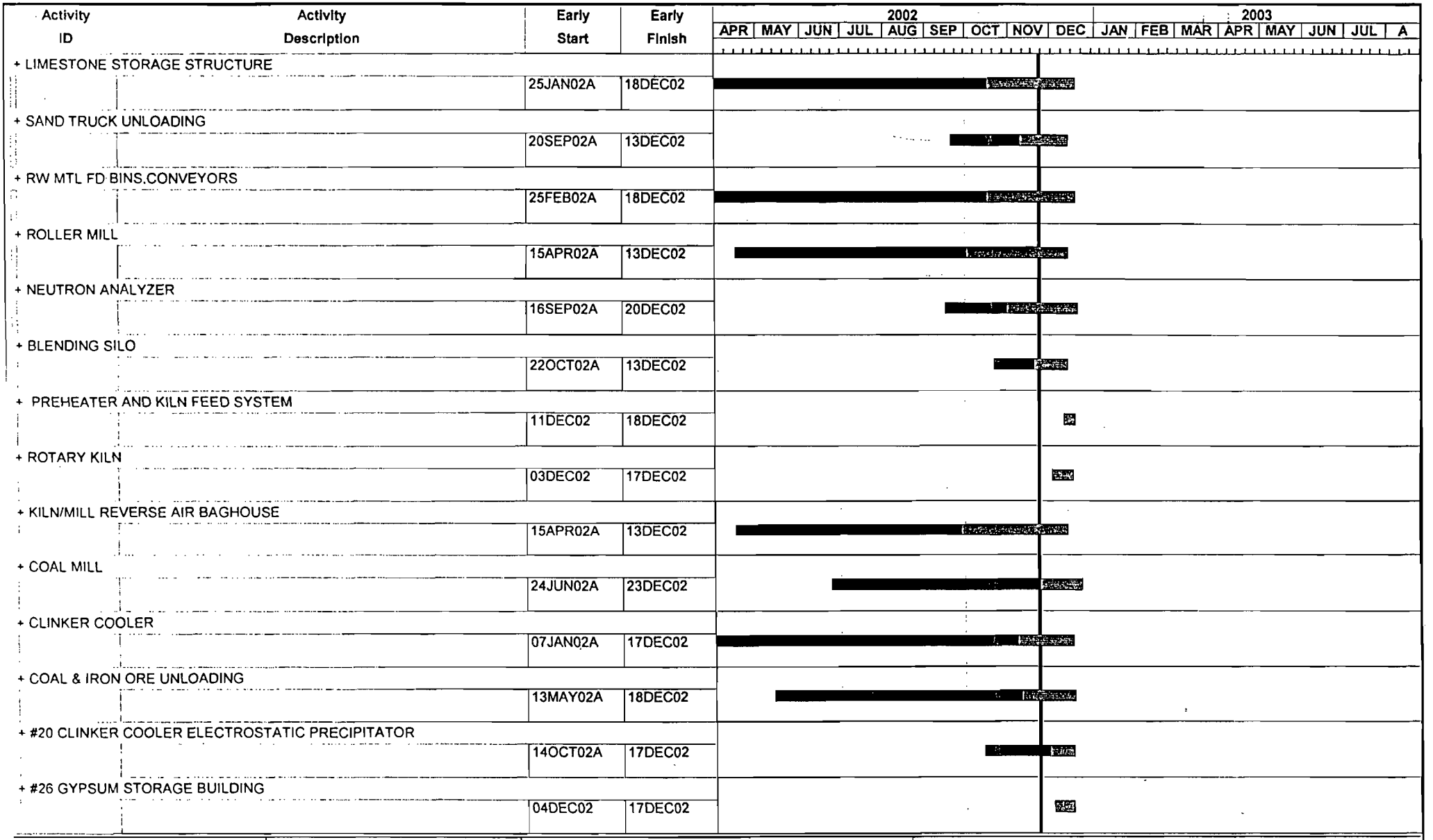
Very truly yours,

KOOGLER & ASSOCIATES

John B. Koogler, Ph.D., P.E.

JBK/jhm
Attachment

cc: Chris Kirts, FDEP, Jacksonville
Celso Martini, SAC
George Townsend, SAC



Start Date	18DEC00
Finish Date	30JAN03
Data Date	24NOV02
Run Date	11DEC02 16:05

Early Bar
Progress Bar
Critical Activity

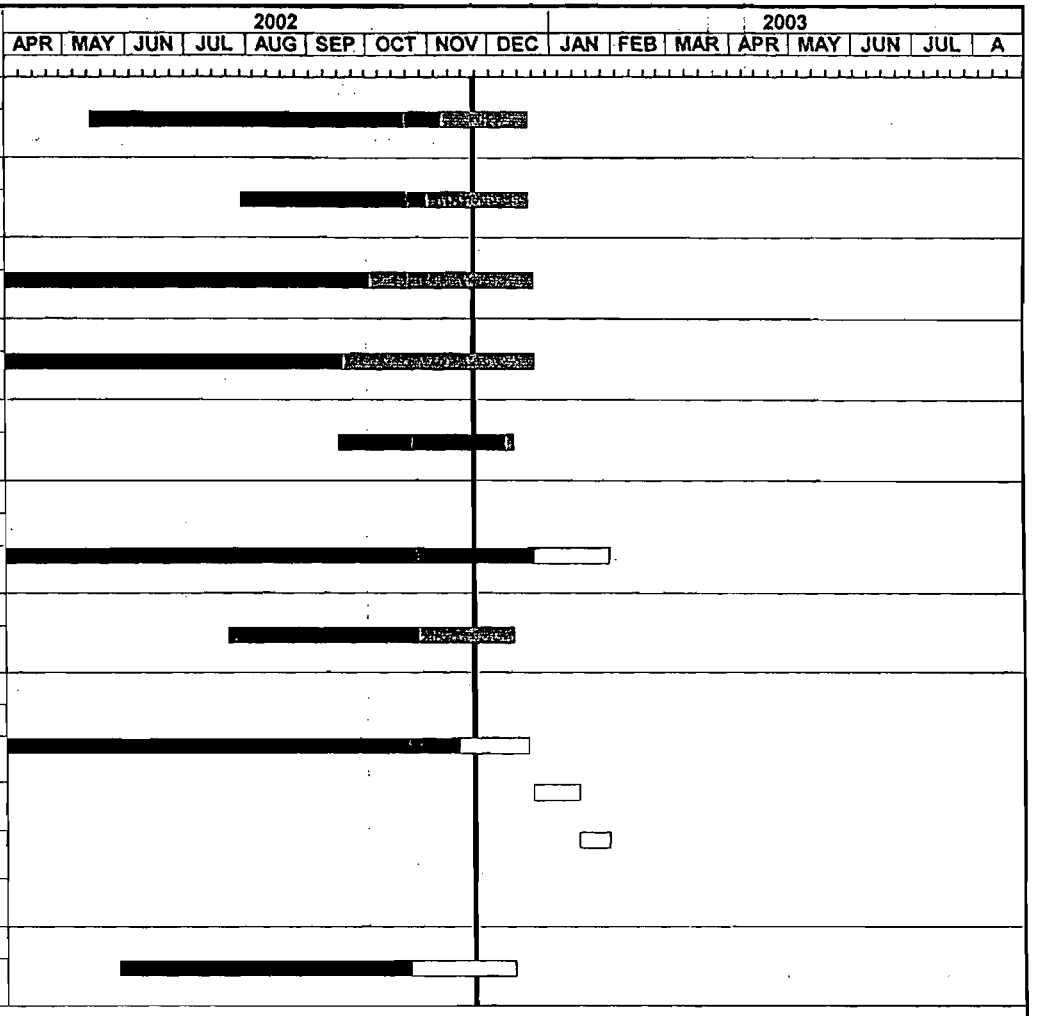
1208

Sheet 1 of 2

SUWANNEE AMERICAN CEMENT
WATKINS ENGINEERS & CONSTRUCTORS
GROUP READINESS SUMMARY

Date	Revision	Checked	Approved

Activity ID	Activity Description	Early Start	Early Finish
+ CLINKER STORAGE SILOS			
		14MAY02A	20DEC02
+ CLINKER TRANSPORT FROM STORAGE			
		29JUL02A	20DEC02
+ FINISH MILL			
		03DEC01A	23DEC02
+ CEMENT STORAGE SILOS & TRUCK LOADING W/SCALE			
		14MAR02A	23DEC02
+ LEACHFIELD & SANITARY SYSTEM			
		16SEP02A	13DEC02
SITEWORK BY SAC			
PLANT SERVICES			
02C11	SITEWORK INCL FINAL GRADING, PONDS, CONST ROADS	16MAR01A	30JAN03
+ OFFICE AND CONTROL ROOM BUILDING			
		22JUL02A	13DEC02
GENERAL			
GENERAL MILESTONES			
02C15	INSTALL FIRE PROTECTION LOOP	20JUL01A	20DEC02
02C85	SITEWIDE TOUCHUP PAINTING	23DEC02	15JAN03
02C125	PUNCHLIST/CHANGE REQUESTS	16JAN03	30JAN03
17C01	WEC MECHANICAL COMPLETION		30JAN03
+ PLANT SERVICES			
		27MAY02A	13DEC02



Start Date 18DEC00
Finish Date 30JAN03
Data Date 24NOV02
Run Date 11DEC02 16:05

Early Bar
Progress Bar
Critical Activity

1208

Sheet 2 of 2

SUWANNEE AMERICAN CEMENT
WATKINS ENGINEERS & CONSTRUCTORS
GROUP READINESS SUMMARY

Date	Revision	Checked	Approved

Memorandum

Florida Department of
Environmental Protection

TO: Howard Rhodes

THRU: Trina Vielhauer
Al Linero

FROM: Greg DeAngelo

DATE: November 6, 2002

SUBJECT: DEP File No. 1210465-002-AC (PSD-FL-259A)
Suwannee American Cement – Request for Amendment/Modification of Permit Condition Notification and Initial Startup of Cement Plant

A final permit amendment letter is attached for your approval and signature.

This amendment for the Suwannee American Cement construction permit removes the requirement in appendix B to provide a notification of the anticipated date of initial startup between 30 and 60 days prior to actual startup. This requirement derived from the part 60 general provisions at 40 CFR 60.7(a)(2), but it was removed from the Federal rules pursuant to the Clean Air Act: Recordkeeping and Reporting Burden Reduction final rule promulgated on February 12, 1999.

To address the needs of the Northeast District Office, however, a new condition has been added to the facility-wide specific conditions. This new condition requires a notification at least 10 days prior to commissioning of the subject equipment. Burden reduction is still achieved as this new condition may be waived by the Department, and it explicitly approves the use of facsimile notification.

I recommend your approval.

Attachments

TTV/AAL/gpd

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

November 8, 2002

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Robert J. Sagmeister
Plant Manager
Suwannee American Cement
Post Office Box 410
Branford, Florida 32008-0410

Re: Request for Amendment/Modification of Permit Condition
Notification and Initial Startup of Cement Plant
DEP File No. 1210465-002-AC (PSD-FL-259A)

Dear Mr. Sagmeister:

The Florida Department of Environmental Protection (Department) reviewed your request dated October 14, 2002 to delete the requirement to furnish written notification of the anticipated date of initial startup of facilities 30 to 60 days prior to such date.

The Department agrees that this Federal requirement at 40 CFR 60.7(a)(2) was repealed in 1999 prior to the issuance of the subject permit. As discussed with you, there are still practical reasons for the Department to need to know in advance of the startup of the plant. Permit condition 7 at page B-2 of the referenced permit is hereby modified as follows:

(a) Any owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification as follows:

(1) [No change.]

~~(2) A notification of the anticipated date of initial startup of an affected facility postmarked not more than 60 days nor less than 30 days prior to such date.~~

(3) through (7) [No changes.]

New facility-wide specific condition 27-A is hereby added to the referenced permit as follows:

27-A. Notification of Anticipated Date of Commission: For each piece of equipment for which a pollution control device, emissions testing, or visual observation is required by this permit, or which is subject to any State or Federal rule, the owner or operator shall submit a notification of the anticipated date of commission for that equipment. The notification shall be postmarked not less than 10 days prior to such date. The Department may waive the notification. Changes of the anticipated date shall be provided in a timely manner. Notifications and changes may be provided by facsimile to the attention of the Northeast District Air Program Administrator at 904/448-4363.

Note that according to U.S. Environmental Protection Agency guidance for New Source Performance Standards (NSPS), "[Startup] for Portland Cement operations is generally considered to be the first day raw material is fed into the preheater or the kiln, depending on facility configuration."[1] The implication is that the date raw material is first fed into the preheater for purposes of producing a product (i.e., "commissioning") would start the 180-day clock for conducting initial performance testing at all affected facilities at the plant.[2] (Affected facilities, in this context, means the components of the cement plant that are individually subject to the NSPS. For example, conveyor transfer points, the in-line raw mill/kiln system, and the clinker cooler are all individual "affected facilities" pursuant to the NSPS.)

The inverse, however, does not hold. In other words, starting up one of the other affected facilities subject to the Portland Cement NSPS, such as conveyor transfer points or bulk unloading systems, would start the 180-day clock *for that affected facility* but not for the remainder of the plant nor for the main preheater, kiln, and clinker cooler system.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes (F.S.).

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen 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 will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code (F.A.C.).

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A

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[1] *See* Instructional Manual for Clarification of Startup in Source Categories Affected by New Source Performance Standards. U.S. EPA Office of Enforcement. EPA-68-01-4143. October 1979.

[2] Initial performance testing must be conducted within 180 days after initial startup of each affected facility (or within 60 days after achieving the maximum production rate at which the affected facility will be operated). *See* 40 CFR 60.8(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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 Department'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 Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above. Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this State statute applies only to State rules, not statutes, and not to any Federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any Federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such Federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the Federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and

28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

Howard L. Rhodes, Director
Division of Air Resources
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 11/13/02 to the person(s) listed:

Robert J. Sagmeister*
Chris Kirts, DEP NED
Lawrence E. Sellers Jr., Holland & Knight LLP*
Jack Chisolm, DEP OGC

Clerk Stamp

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

Victoria Gibson November 13, 2002
(Clerk) (Date)

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Mr. Fred W. Koester
President
Suwannee American Cement Company, Inc.
PO Box 410
Brandford, FL 32008

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* Susan Vaughan B. Date of Delivery 11-15-02

C. Signature
X Susan Vaughan ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 7645

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

7001 0320 0001 3692 7645

Sent To Fred W. Koester
Street, Apt. No.; or PO Box No. PO Box 410
City, State, ZIP+4 Branford, FL 32008

PS Form 3800, January 2001 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Mr. Robert J. Sagmeister
Plant Manager
Suwannee American Cement
P. O. Box 410
Branford, FL 32008-0410

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Susan Vaughan — B. Date of Delivery: 11-15-02

C. Signature: X Susan Vaughan — ☐ Agent ☒ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2 7001 0320 0001 3692 7676

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Robert J. Sagmeister
Street, Apt. No.; or PO Box No: PO Box 410
City, State, ZIP+4: Branford, FL 32008-0410

7001 0320 0001 3692 7676

PS Form 3800, January 2001 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Lawrence E. Sellers, Jr.
Esquire
Holland & Knight, LLP
P. O. Drawer 810
Tallahassee, FL 32301

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* B. Date of Delivery

Chip Medd NOV 14 2002

C. Signature

X Chip Medd ☐ Agent ☐ Addressee

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

PARKVIEW STATION TALLAHASSEE FL

3. Service Type

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. 7001 0320 0001 3692 7652

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

7001 0320 0001 3692 7652

Sent To Lawrence E. Sellers, Jr.
Street, Apt. No.; or PO Box No. P.O. Drawer 810
City, State, ZIP+4 Tallahassee, FL 32301

PS Form 3800, January 2001 See Reverse for Instructions

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF FINAL PERMIT

In the Matter of an
Application for Permit by:

Fred W. Koester, President
Suwannee American Cement Company, Inc.
PO Box 410
Branford, Florida 32008

DEP File No. 1210465-001-AC, PSD-FL-259
Branford Plant, Portland Cement Plant
Suwannee County

Enclosed is Final Permit Number 1210465-001-AC. This permit authorizes Suwannee American Cement Company, Inc. to construct a portland cement plant located at US Highway 27 and County Road 49, Suwannee County. This permit is issued pursuant to Chapter 403, Florida Statutes.

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

Executed in Tallahassee, Florida.

Lisa Polak Edgar

Lisa Polak Edgar
Deputy Secretary

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Final Permit (including the Final permit) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6-1-00 to the person(s) listed:

Mr. Fred W. Koester * ✓
~~Mr. Larry Sellers~~ dupe
Mr. Frank Darabi, P.E.
Mr. Steve Cullen, P.E. ✓
Mr. Ernest E. Frye, Director, NE District ✓
Mr. Gregg Worley, EPA ✓
Mr. John Bunyak, NPS ✓
Mr. Jim Stevenson, DEP ✓
Mr. Tom Workman, DEP ✓
Mr. Mark Latch, DEP ✓

Ms. December McSherry ✓
Mr. Svenn Lindskold ✓
Mr. Tom Greenhalgh ✓
Mr. Dave Bruderly ✓
Mr. Chris Bird, Alachua Co. DER ✓
Mr. John Mousa, Alachua Co. DER ✓
Ms. Penny Wheat, Chair, Alachua Co. Board of Co. Commissioners ✓

Mr. J. Calvin Gaddy ✓
Ms. Patrice Boyes, Esq. ✓
Ms. Kathy Cantwell ✓
Mr. Ralph Ashodian ✓
Ms. Virginia Seacrist ✓
Dr. Bob and Lynn Milner ✓
Ms. Linda Pollini ✓
Helen Beaty ✓
Bessie Robinson ✓
Mr. Craig Pittman, St. Petersburg Times ✓

Clerk Stamp

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

Kami Tober (Clerk) 6-1-00 (Date)

5505 5515
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

NOV 13 02

U.S POSTAGE
037

>>>RTN TO SENDER=UNDELIVERABLE AS ADDRESSED-1203026<<<

Mr. Chyris Bird
Director
Alachua County Department of
Environmental Regulation
226 S. Main Street
Gainesville, FL 32601

32601-6538 01

5505 5515
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

NOV 13 02

U.S POSTAGE
037

>>>RTN TO SENDER=UNDELIVERABLE AS ADDRESSED-1203026<<<

Mr. John Mousa
Alachua County Department of
Environmental Regulation
226 South Main Street
Gainesville, FL 32601

32601-6538 01

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

October 14, 2002

VIA FACSIMILE

Mr. Al Linero
Department of Environmental Protection
111 S. Magnolia, Suite 4
Tallahassee, FL 32399

Re: Permit No. 1210465-001-AC, PSD-FL-259;
Request for Amendment/Modification of Permit Condition
Requiring Notification of Start Up.

Dear Mr. Linero:

Suwannee American Cement Company, Inc., respectfully requests that the referenced permit be amended to delete the requirement for the owner or operator to furnish written notification of the anticipated date of initial start up of an affected facility. *See, e.g.*, NSPS General Provision 7.(a)(2) at page B-2.

As you know, this requirement originally was included in the permit pursuant to 40 C.F.R. 60.7(a)(2), but that requirement was repealed effective April 13, 1999. *See* 64 Fed. Reg. 7458 (February 12, 1999).

Thank you for your prompt attention to this request. Please call if you have any questions.

Very truly yours,

Robert J. Sagmeister
Plant Manager

cc: Howard Rhodes, DEP
Jack Chisolm, DEP
Pat Comer, DEP
Lawrence E. Sellers, Jr., Holland & Knight LLP
John Koogler, Koogler & Associates

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

Received
October 14, 2002

October 14, 2002

VIA FACSIMILE

Mr. Al Linero
Department of Environmental Protection
111 S. Magnolia, Suite 4
Tallahassee, FL 32399

Re: Permit No. 1210465-001-AC, PSD-FL-259;
Request for Amendment/Modification of Permit Condition
Requiring Notification of Start Up.
1210465-002-AC

Dear Mr. Linero:

Suwannee American Cement Company, Inc., respectfully requests that the referenced permit be amended to delete the requirement for the owner or operator to furnish written notification of the anticipated date of initial start up of an affected facility. *See, e.g.*, NSPS General Provision 7.(a)(2) at page B-2.

As you know, this requirement originally was included in the permit pursuant to 40 C.F.R. 60.7(a)(2), but that requirement was repealed effective April 13, 1999. *See* 64 Fed. Reg. 7458 (February 12, 1999).

Thank you for your prompt attention to this request. Please call if you have any questions.

Very truly yours,

Robert J. Sagmeister
Plant Manager

cc: Howard Rhodes, DEP
Jack Chisolm, DEP
Pat Comer, DEP
Lawrence E. Sellers, Jr., Holland & Knight LLP
John Koogler, Koogler & Associates

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7089

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Penny Wheat
Street, Apt. No.; or PO Box No: PO Box 2877
City, State, ZIP+4: Gainesville, FL 32602

PS Form 3800, January 2001 — See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7096

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Tom Greenhalgh
Street, Apt. No.; or PO Box No: 2295 Paul Russell Road
City, State, ZIP+4: Tallahassee, FL 32301-7102

PS Form 3800, January 2001 — See Reverse for Instructions

file with PSA-FL-2598
Amendment letter
dated 1-16-03 -
Don't scan

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Penny Wheat, Chair
Alachua County Board of
County Commissioners
P. O. Box 2877
Gainesville, FL 32602

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X J. Crow ☑ Agent ☐ Addressee

B. Received by (Printed Name): J. Crow
C. Date of Delivery: 1-22-03

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

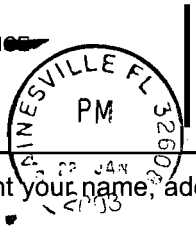
3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. [illegible]

PS F[illegible] 102595-02-M-1540

UNITED STATES POSTAL SERVICE



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

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

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

RECEIVED
JAN 23 2003
BUREAU OF AIR REGULATION

01

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7133

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Claude Grinfeder
Street, Apt. No.; or PO Box No.: PO Box 410
City, State, ZIP+4: Branford, FL 32008

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1 Article Addressed to:

Mr. Claude Grinfeder
Suwannee American Cement
Post Office Box 410
Branford, FL 32008

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* — B. Date of Delivery: 1-21-03

C. Signature
X
☐ Agent
☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 7133

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-00-M-0952

UNITED STATES POSTAL SERVICE

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

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

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

RECEIVED
JAN 23 2003
BUREAU OF AIR REGULATION

01

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7072

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Patrice Boyes
Street, Apt. No.; or PO Box No.: PO Box 1424
City, State, ZIP+4: Gainesville, FL 32602

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1 Article Addressed to:

Patrice Boyes, Esquire
Boyes and Associates, PA
Post Office Box 1424
Gainesville, FL 32602

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by *(Printed Name)*: LINETTE SINGLETON
C. Date of Delivery: 1/22/03

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

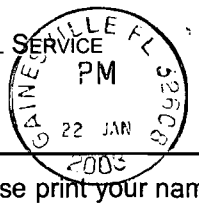
3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

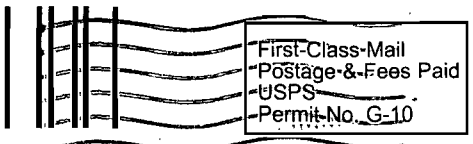
4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 7072

PS Form 3811, August 2001 — Domestic Return Receipt — 102595-02-M-1540

UNITED STATES POSTAL SERVICE





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

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

RECEIVED
JAN 23 2003
BUREAU OF AIR REGULATION

01

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7140

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Celso A. Martini
Street, Apt. No., or PO Box No.: PO Box 410
City, State, ZIP+4: Branford, FL 32008

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1 Article Addressed to:

Celso A. Martini, Plant Manger
Suwannee American Cement
Post Office Box 410
Branford, FL 32008

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: A Williams — B. Date of Delivery: 1-21-03

C. Signature: X ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 7140

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-00-M-0952

UNITED STATES POSTAL SERVICE

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

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

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

RECEIVED
JAN 23 2003
BUREAU OF AIR REGULATION

01

cc: AC
From: Mike
FYI 9/18

Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

September 17, 2003

CERTIFIED-RETURN RECEIPT

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

Post-it® Fax Note 7671 | Date 9/8/03 | # of pages ▶ 1
To Trina Vielhauer | From Chris Kirts
Co./Dept. AIR - DARM | Co. DEP
Phone # SC291 9503 | Phone # SC804 3235
Fax # SC291 9533 | Fax # 904 448 4363

Dear Mr. Martini:

Suwannee American Cement Company
Suwannee County - Air Enforcement

One of the required compliance tests is for Mercury emissions at the Kiln and inline Raw mill Main Stack. The average of the three test runs for Mercury found the emissions at 0.022 lbs. Per hour. This would be equivalent to 193 lbs. Per 12 month rolling total Mercury emissions at full production. Since the permitted Mercury emissions rate is 97 lbs. Per 12 month rolling total, this would limit your operation to 4,409 hours in a 12 month rolling period at full production.

If you have any questions concerning this matter feel free to contact John Gay at (904) 807-3240. We look forward to your cooperation in completing this investigation and resolution of this matter.

file in PSD-FL-259
no need to scan

Sincerely,

Christopher L. Kirts, P.E.
Air Program Administrator

CLK:jjg

cc: Joe Horton, Environmental Manager

FPL Lauderdale Repowering

April 19, 1990

Skip Moore	FPL	407 6402055
Barry Andrews	DER-BAR	904 488-1344
Clair Fancy	DER-BAR	904 488 1344
Rick Neff	KBN	(904) 331-9000
Harold Frediani	EBASCO	(404) 662-2383
Rick Hathaway	FPL	(407) 640-2251
Peter Cunningham	NBGS	(904) 222-7500
Buck Oven	DER-Siting-	904-488-1344
Charles Henderson	FPL	(407) 640-2060
Ken Kosky	KBN	(904) 331-9000

$5200

BROWARD COUNTY ENVIRONMENTAL QUALITY CONTROL BOARD

500 S.W. 14th Court
Fort Lauderdale, FL 33315
(305) 765-4900

Air Section
621 S. Andrews Avenue
Ft. Lauderdale, FL 33301
(305) 765-4436

RECEIVED
SEP 17 1990
DER - BAQM

September 14, 1990

Office of the General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

CERTIFIED MAIL-RRR

Re: Petition for Administrative Hearing
DER Intent to Issue Permit AC 06-179848

Dear Sir:

Attached is our Petition for an Administrative Proceeding in the matter of the Intent by DER to Issue a Permit to the FPL Lauderdale Plant.

We note that this permit is intimately related with the Site Certification Application for the Lauderdale Repowering Project for which Public Hearings are scheduled here beginning September 24, 1990.

If you have any questions regarding this matter, please call A. A. Linero at 765-4436.

Yours very truly,

Victor N. Howard, P.E.
Pollution Control Officer

VNH/AAL/mr

Attachment

cc: FPL - West Palm Beach
BCEQCB Board Members
BCEQCB Staff Attorney
Jewel Harper - EPA Atlanta
Gary Carlson - BCEQCB
Broward County Attorney
Tom Henderson - BC Resource Recovery
Clair Fancy - DER Tallahassee
Isidore Goldman - DER S.E. District

PETITION FOR ADMINISTRATION PROCEEDING IN THE MATTER OF INTENT BY DER TO ISSUE A PERMIT TO FPL LAUDERDALE PLANT

Petitioner

Broward County Environmental Quality Control Board

500 SW 14th Ct
Fort Lauderdale, Fl 33315
(305) 765-4436

DER File NO. AC 06-179848
Broward County

Notification

Broward County Environmental Quality Control Board (EQCB) received a copy on September 4, 1990 of the Intent to Issue a Permit dated August 31, 1990. We were copied as the Local Pollution Control Agency in a county affected by Department Action.

Statement of Interests

The EQCB is affected as the Local Pollution Control Agency responsible (along with the DER) with the maintenance of air quality in Broward County. At the present time the existing facility in question falls under both State and Local Permitting requirements.

With a future planned FPL project at the same site, it is quite likely that this facility will at some point no longer fall under local jurisdiction per previous interpretations by DER Counsel of the Local Role in projects covered by the Site Certification Act (SCA).

Broward County is part of a three - County area within the Southeast Florida interstate Air Quality Control Region (AQCR) designated on December 31, 1982 by EPA as "Non Attainment" with respect to ozone. This designation and the resulting attainment plans affect the material interests of Broward County residents in general and the EQCB in particular. The subject permit is primarily a preparatory administrative step toward the ultimate construction of a project which will affect ozone levels in the County, the attainment plan and hence the material interests of Broward County residents in general and the EQCB in particular. Once the subject permit is granted, the EQCB will have no remedies in effecting the controls desired of the subsequent project short of legal action since it is not a party to the proceedings on that project.

Cherly Dobeck
SC 497-4900
Our FAX 278 4883439

BROWARD COUNTY ENVIRONMENTAL QUALITY CONTROL BOARD

500 S.W. 14th Court
Fort Lauderdale, FL 33315
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September 14, 1990

CERTIFIED MAIL-RRR

Office of the General Counsel
Florida Department of Environmental Regulation
2600 Blair Stone Road
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Re: Petition for Administrative Hearing
DER Intent to Issue Permit AC 06-179848

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If you have any questions regarding this matter, please call A. A. Linero at 765-4436.

Yours very truly,

for

Victor N. Howard, P.E.
Pollution Control Officer

VNH/AAL/mr

Attachment

cc: FPL - West Palm Beach
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Isidore Goldman - DER S.E. District

3489 RY M/O SCR

FPL Sanford Plant – SO_2 Emission

(A) Short Term SO_2 Emission

CT can burn 1646.9×10^6 BTU/hr of oil per turbine

Oil has 0.3% S max (0.2% S annual avg)

no. 2 oil about 6.83 lbs/gal & 129,000 Btu/gal

$$E_{\frac{mat}{hr}} = 1646.9\times10^6 \frac{Btu}{hr} \cdot \frac{gal}{128{,}000\ Btu} \cdot 6.83 \frac{lbs\ oil}{gal} \cdot \frac{.003 \times 2\ lbs\ SO_2}{lb\ oil}$$

$\approx$ 523 lbs/hr [They have 538 lbs/hr/CT, difference being Btu content of oil, this no. ok]

$$E_{long\ term} \quad 538 \frac{lbs\ SO_2}{hr} \cdot \frac{0.2\%\ S}{0.3\%\ S} = 358.7 \frac{lbs}{hr/CT}$$

based on oil with 0.2% S

(B) Gas firing 10 gr S/100 CF produces 0.97 lbs SO_2/hr/CT

0.05 lbs/hr/DB

(C) Annual heat input limits

54,129,421 MM Btu – all units/both fuels

14,426,844 MM Btu – CTs on oil

Oil firing 25% = (.25)(8760) = 2190 hrs/yr

gas firing 87% – 25% = 62% or (.62)(8760) = 5431.2 hrs/yr

(D) Total Annual Emissions are:

SO_2-Oil	(2190)(358.7 lbs/hr)(4)/(2000) =	1571.1
gas CT	(5431.2)(0.97 #/hr/CT)(4CT)/(2000) =	10.5
gas DB	(5431.2)(0.05 #/hr/DT)(4DT)/2000 =	0.5
		1582 TPY

(in BA original permit)

Attachments: FPL March 12, 1993, letter
FPL May 18, 1993, letter
EPA April 8, 1993, letter

cc: H. Oven, PPS
S. Brooks, SED
T. Tittle, SED
J. Harper, EPA
D. Banu, Broward Co.
P. Cunningham, Attny.

Proposed Amendment

Oil - No. 6 — 1571.1 TPY SO_2

gas now 4.9 lb/hr/CT
0.25 lb/hr/DB

CT = (5421.2 hr)(4.9)(4 CT)/2000 = 53.2 TPY SO_2

DB = (")(0.25)(4 DB)/2000 = 2.7

55.7 TPY SO_2

Total Annual E = CT on Oil + CT + DB on gas
= 1571.1 + 55.7 = 1626.8 TPY ← oil/gas CT+DB

(E) DM 4 CT + DB shall not burn more 54,129,421 mm Btu (5.C.2) + 14,426,844 MM Btu on DM

Btu in gas = 54129421 - 14426844 = 39,702,577 Btu

(F) hrs of CT op = $\frac{39,702,577 \text{ BTU}}{(1685 + 90.62)4}$ = 5590 hr/yr/CT

(G) CT SO_2 emiss from gas = (5590)(4.9)(4)/2000 = 54.8 TPY CT
DB " = (")(.25)(")/(") = $\frac{2.8 \text{ TPY}}{57.6}$ DB

(H) FPL ANNUAL LIMIT = 1571.1 TPY Oil + 57.6 TPY Gas = 1628.7 TPY SO_2

NOx	42 ppmvd	Gas	264	4,868
	65 ppmvd	Oil	422	
VOC	1 ppmvd	Gas	1.3	50
	6 ppmvd	Oil	7.8	
CO	30 ppmvd	Gas	89	1,489
	33 ppmvd	Oil	100	
PM/PM10		Gas	14.7	
		Oil	58.0	424.7
SO2		Gas	4.9	
		Oil	538	1,629

CT - Combustion Turbine
DB - Duct Burner

NOTES: * Refers to the maximum facility emissions (four CTs). With capacity factor limitations of 25 percent on oil.

** Table revised to reflect removal of the duct burners and reallocation of the annual emissions to the CTs.

Sulfur dioxide emissions assume a maximum of 0.3 percent sulfur in fuel oil for hourly emissions and an average sulfur content of 0.2 percent for annual emissions. ~~Maximum allowable sulfur content in the natural gas is 10 gr/1000 CF.~~

The permittee shall calculate a lb/MMBtu emission curve for each pollutant based on the compliance tests heat input rates/water injection rate/emission measurements. After submittal to and approval by the Department, the permittee shall program the on site computer system to calculate and record the emissions of each pollutant for each CT. Results shall be reported as lbs/hr and TPY.

Pat - NEED STANDARD LEGAL LANGUAGE FOR AMENDMENT ~~WITHOUT~~ WITH PUBLIC NOTICE INSERTED HERE.

A copy of this letter shall be attached to the referenced permit and shall become a part of that permit.

Sincerely,

Howard L. Rhodes
Director
Division of Air Resources
Management

HLR/CF/wmh

MY WAY

S.C. 2

54,129,421 mm Btu TOTAL
- 14,426,844 mm Btu Oil
39,702,577 mm Btu gas

SO_2 FROM OIL = $\frac{14,426,844 \times 10^6 \text{ Btu} \mid 6.83 \text{ lbs oil} \mid .004 \text{ lbs } SO_2}{129,000 \text{ Btu} \mid \text{lb oil} \mid 2000 \text{ lb}}$ I

(1571.1)
= 1527.7 TPY SO_2 from oil

SO_2 From gas = $\frac{39,702,577 \times 10^6 \text{ Btu} \mid \text{CF} \mid 100 \text{ gr S} \mid \text{lb} \mid 2 \text{ lbs } SO_2}{1000 \text{ Btu} \mid 1000 \text{ CF} \mid 7000 \text{ gr} \mid \text{lb}}$ I

(57.6)
= 56.7 TPY SO_2 from gas

Total SO_2 = 1527.7 + 56.7 = 1584.4
(oil/gas)

The maximum allowable sulfur (total) content of the natural gas burned at this facility shall not exceed 10 grains per 1,000 cubic feet (gr/1000 CF). The permittee shall monitor the sulfur content of the natural gas by the customized fuel monitoring schedule approved in EPA's April 8, 1993, letter to the Department.

The maximum allowable emissions from each CT and duct burner in accordance with the BACT determination shall not exceed any of the following emission limitations:

MAXIMUM ALLOWABLE EMISSION LIMITS WITH THE DUCT BURNERS INSTALLED

Pollutant	Basis (@15% O2)	Fuel	Emission Limitations* lb/hr/CT	lb/hr/DB	4 CT* (TPY)	4 DB* (TPY)
NOx	42 ppmvd	Gas	264	10.0		152
	65 ppmvd	Oil	422		4,716	
VOC	1 ppmvd	Gas	1.3	2.0		30.5
	6 ppmvd	Oil	7.8		48.3	
CO	30 ppmvd	Gas	89	17.6	1,405	268
	33 ppmvd	Oil	100			
PM/PM10		Gas	14.7	0.7		10.7
		Oil	58.0		414	
SO2		Gas	4.9	0.25		4.0
		Oil	538		1,625	

CT - Combustion Turbine
DB - Duct Burner

NOTES: * Refers to the maximum facility emissions (four CTs). With capacity factor limitations of 25 percent on oil.

NOx emissions from duct burners are based on an as-fired emission limitation of 0.11 lbs/MMBtu.

Sulfur dioxide emissions assume a maximum of 0.3 percent sulfur in fuel oil for hourly emissions and an average sulfur content of 0.2 percent for annual emissions. ~~The maximum allowable sulfur content of the natural gas is 10 grains per 1,000 cubic feet (gr/1000 CF).~~

MAXIMUM ALLOWABLE EMISSIONS PRIOR TO THE INSTALLATION OF THE DUCT BURNERS

Pollutant	Basis (@15% O2)	Fuel	Emission Limitations lb/hr/CT	4 CT* (TPY)

Original PSD Permit

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS:

1. The maximum heat input to each combustion turbine (CT) shall neither exceed 1,685.0 MMBtu/hr while firing natural gas, nor 1,646.9 MMBtu/hr while firing fuel oil (@ 75°F). Each CT's fuel consumption shall be continuously measured and recorded. The maximum heat input to each duct burner shall not exceed 90.62 MMBtu/hr. Each duct burner's fuel consumption shall be continuously measured and recorded.

2. Each of the four CTs may operate continuously, i.e., 8,760 hrs/year provided that the total (four turbines) annual heat input attributed to light distillate fuel oil firing does not exceed 14,426,844 MMBtu (@ 75°F) and the total heat input for all four turbines and the duct burners does not exceed 54,129,421 MMBTU.

3. The heat input restrictions in conditions 1 and 2 above are based on projected emissions and are thereby subject to change based on equipment vendors, emission guarantees or actual test data. Only natural gas or light distillate fuel oil shall be fired in the turbines.

4. The duct burners shall be fired with natural gas only. The duct burners shall not be operated when the turbines are firing oil.

5. The maximum allowable emissions from each CT in accordance with the BACT determination shall not exceed the following emission limitations at 75°F:

PERMITTEE:
Florida Power & Light Company

Permit Number: PSD-FL-14[illegible]
Project: Lauderdale Repower[illegible] Project

Pollutant	Basis	Fuel	Emission Limitations lb/hr/CT	lb/hr/DB	4 CT* (TPY)	4 DB+ (TPY)
NO_x	42 ppmvd	Gas	264	10.0		152
	65 ppmvd	Oil	422		4,716	
VOC	1 ppmvd	Gas	1.3	2.0		30.5
	6 ppmvd	Oil	7.8		48.3	
CO	30 ppmvd	Gas	89	17.6	1,405	268
	33 ppmvd	Oil	100			
PM/PM_{10}		Gas	14.7	0.7		10.7
		Oil	58.0		414	
SO2		Gas	0.97	0.05		0.8
		Oil	538		1,582	

CT - Combustion Turbine
DB - Duct Burner

NOTES: * Refers to the maximum facility emissions (four CTs). With capacity factor limitations of 25 percent on oil and 87 percent for the facility.
+ Refers to maximum duct burner emissions at 87 percent capacity factor.

NO_x emissions from duct burners are based on an as-fired emission limitation of 0.11 lbs/MMBtu.

Sulfur dioxide emissions assume a maximum of 0.3 percent sulfur in fuel oil for hourly emissions and an average sulfur content of 0.2 percent for annual emissions.

6. The following emissions, determined by BACT, are tabulated for PSD and inventory purposes:

Pollutant	Fuel	Maximum Allowable Emissions (@75°F) lb/hr/CT	lb/hr/DB	4 CT* (TPY)	4 DB+ (TPY)
H_2SO_4 Acid Mist	Gas	0.042	0.0002		0.003
	Oil	67		196	
Mercury	Gas	0.0192	0.001	0.3	0.002
	Oil	0.0049			
Fluoride	Oil	0.0535	-----	0.23	-----
Beryllium	Oil	0.0041	-----	0.02	-----

NOTES: * Refers to the maximum facility emissions (four CTs).
+ Refers to the maximum facility emissions (four DBs).

Sulfuric acid mist emissions assume a maximum of 0.3 percent sulfur in fuel oil for hourly emissions and an average sulfur content of 0.2 percent for annual emissions.

7. Visible emissions shall neither exceed 10% opacity while burning natural gas nor 20% opacity while burning distillate oil.

8. The nitrogen oxide emissions from each combustion turbine unit shall be controlled by using steam injection for both natural gas and fuel oil firing modes. In addition, the Permittee shall install duct modules suitable for later installation of SCR equipment when constructing the combined cycle generating units at the facility.

9. Under the unique circumstances of this case, the Department has determined that the Best Available Control Technology (BACT) NO_x emissions limit is 65 ppm when burning oil and 42 ppm when burning gas and, in addition to complying with BACT at the Lauderdale Plant, FPL shall install "low NO_x" burners on Port Everglades Units 3 and 4 on or before the in service date of the Lauderdale Repowering Project that are capable of achieving a maximum NO_x emission rate which shall not exceed the greater of 0.5 lbs/10^6 BTU, or 75% of the maximum rate determined for the existing Port Everglades Units 3 and 4 burner configuration. The maximum rate shall be determined in a manner acceptable to the Department. Stack testing of NO_x emissions from Port Everglades Units 3 and 4 shall be conducted as part of regularly scheduled annual compliance tests. Should the low NO_x burners prove

to be capable of achieving a significantly greater NO_x reduction at the Port Everglades Plant, the Department reserves the right to adjust the applicable pounds per million Btu limit for the Port Everglades Plant accordingly.

10. Initial (I) compliance tests shall be performed on each combustion turbine using both fuels. The stack test for each turbine shall be performed within 10 percent of the maximum heat input rate for the tested operating temperature. Annual (A) compliance tests shall be performed on each combustion turbine with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods in accordance with the July 1, 1988 version of 40 CFR 60 Appendix A:

a. 5 or 17 for PM (I, A - for oil only)

b. 8 for sulfuric acid mist (I, for oil only)

c. 9 for VE (I, A)

d. 10 for CO (I, A)

e. 20 for NO_x (I, A)

f. 25A for VOC (I, A)

g. 104 for Beryllium (I, for distillate oil only). A fuel analysis for Be using either Method 7090 or 7091, and sample extraction using Method 3040, as described in the EPA solid waste regulations SW 846, is also acceptable

h. ASTM D 2880-71 (or equivalent) for sulfur content of distillate oil (I, A)

i. ASTM D 1072-80, D 3031-81, D 4084-82 or D 3245-81 or equivalent for sulfur content of natural gas (I and A if deemed necessary by DER).

Other DER approved methods may be used for compliance testing after prior DER approval.

11. The average annual sulfur content of the light distillate fuel oil shall not exceed 0.2 percent by weight. The maximum sulfur content of the light distillate fuel oil shall not exceed 0.3 percent. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.335 by testing all oil shipments for sulfur content using ASTM D 2880-71 or equivalent, testing for nitrogen content and testing for heating value.

12. Continuous monitoring of steam injection rates shall be installed, operated and maintained in accordance with 40 CFR 60, Subpart GG, for each combined cycle unit.

13. To determine compliance with the oil firing heat input limitation, the Permittee shall maintain daily records of fuel oil consumption for each turbine and monthly records of heating value for such fuel. All records shall be maintained for a minimum of three years after the date of each record and shall be made available to representatives of DER upon request.

14. The project shall comply with all the applicable requirements of Chapter 17-2, Florida Administrative Code, and the July 1, 1988 version of 40 CFR 60, Subpart GG, Gas Turbines.

15. Any change in the method of operation, fuels or equipment shall be submitted for approval to DER's Bureau of Air Regulation.

16. If start/black start capability for the CTs is provided by a combustion unit, DER shall be notified of the type/model, output capacity, anticipated hours of operation and air emissions of the unit.

17. The Permittee shall have required sampling tests of the emissions performed within 60 days after achieving the maximum turbine firing rate, but not later than 180 days from the start of operation. Thirty (30) days prior to the initial sampling test and fifteen (15) days notice before subsequent annual testing shall be provided to the Southeast District Office. Written reports of the tests shall be submitted to the Southeast District Office within 45 days of test completion.

18. If construction does not commence within 18 months of issuance of this certification/permit, then the Permittee shall obtain from DER a review and, if necessary, a modification of the control technology and allowable emissions for the unit(s) on which construction has not commenced (40 CFR 52.21(r)(2)).

19. Quarterly excess emission reports, in accordance with the July 1, 1988 version of 40 CFR 60.7 and 60.334 shall be submitted to DER's Southeast District Office. Annual reports shall be submitted to the District Office in accordance with Rule 17-2.700(7), Florida Administrative Code.

20. Literature on equipment selected shall be submitted as it becomes available. A CT-specific graph of the relationship between NO_x emissions and steam injection and also another of ambient temperature

and heat inputs to the CT shall be submitted to DER's Southeast District Office and the Bureau of Air Regulation.

21. Stack sampling facilities shall be provided for each of the four stacks.

22. Construction period fugitive dust emissions shall be minimized by covering or watering dust generation areas.

Issued this 14 day of March, 1991

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Carol M. Browner, Secretary

FPL Lauderdale Plant

Willard – These pages are from the cond. of cert. Gary 7/15/93

10. "Power plant" shall mean the electric power generating equipment and appurtenances to be constructed on the Lauderdale site in Broward County, as generally depicted in the Application.

11. "Project" shall mean the Lauderdale Repowering Project (LRP) and all associated facilities, including: the power plant and related facilities and the cooling reservoir and related facilities.

12. "SFWMD" shall mean the South Florida Water Management District.

13. "ISO" shall mean International Organization for Standardization, ISO 3977-1978(E) standard conditions for gas turbines = 14.7 psia, 15°C, relative humidity 60%.

B. Applicable Rules

The construction and operation of the LRP shall be in accordance with all applicable provisions of at least the following regulations of DER: Chapters 17-2, 17-256, 17-321, 17-322, 17-302, 17-650, 17-660, 17-701, 17-4, 17-25, and 17-610, Florida Administrative Code or their successors as they are renumbered.

II. AIR

The construction and operation of the LRP shall be in accordance with all applicable provisions of Chapter 17-2, Florida Administrative Code. In addition to the foregoing, LRP shall comply with the following conditions of certification as indicated.

A. Emission Limitations for LRP

1. The maximum heat input to each combustion turbine (CT) shall neither exceed 1,685.0 MMBtu/hr while firing natural gas, nor 1,646.9 MMBtu/hr while firing fuel oil (@ 75°F). Each CT's fuel consumption shall be continuously measured and recorded. The maximum heat input to each duct burner shall not exceed 90.62 MMBtu/hr. Each duct burner's fuel consumption shall be continuously measured and recorded.

2. Each of the four CTs may operate continuously, i.e., 8,760 hrs/year provided that the total (four turbines) annual heat input attributed to light distillate fuel oil firing does not exceed 23,082,950 MMBtu (@ 75°F) and the total heat input for all four turbines and the duct burners does not exceed 54,129,421 MMBTU.

3. The heat input restrictions with A.1. and A.2. above are based on projected emissions and are thereby subject to change based on equipment vendors, emission guarantees or actual test data. Only natural gas or light distillate fuel oil shall be fired in the turbines.

4. The duct burners shall be fired with natural gas only. The duct burners shall not be operated when the turbines are firing oil.

5. The maximum allowable emissions from each CT in accordance with the BACT determination shall not exceed the following emission limitations at 75°F:

Pollutant	Basis	Fuel	Emission Limitations lb/hr/CT	lb/hr/DB	4 CT* (TPY)	4 DB+ (TPY)
NO_x	42 ppmvd	Gas	264	10.0		152
	65 ppmvd	Oil	422		5,131	
VOC	1 ppmvd	Gas	1.3	2.0		30.5
	6 ppmvd	Oil	7.8		65.2	
CO	30 ppmvd	Gas	89	17.6	1,434	268
	33 ppmvd	Oil	100			
PM/PM_{10}		Gas	14.7	0.7		10.7
		Oil	58.0		528	
SO2		Gas	0.97	0.05		0.8
		Oil	538		2,413	

CT - Combustion Turbine
DB - Duct Burner

NOTES: * Refers to the maximum facility emissions (four CTs). With capacity factor limitations of 40 percent on oil and 87 percent for the facility.
+ Refers to maximum duct burner emissions at 87 percent capacity factor.

NO_x emissions from duct burners are based on an as-fired emission limitation of 0.11 lbs/MMBtu.

Sulfur dioxide emissions assume a maximum of 0.3 percent sulfur in fuel oil for hourly emissions and an average sulfur content of 0.2 percent for annual emissions.

6. The following emissions, determined by BACT, are tabulated for PSD and inventory purposes:

Pollutant	Fuel	Maximum Allowable Emissions (@75°F) lb/hr/CT	lb/hr/DB	4 CT*	4 DB+
H_2SO_4 Acid Mist	Gas	0.042	0.0002		0.003
	Oil	67		450	
Mercury	Gas	0.0192	0.001	0.3	0.002
	Oil	0.0049			
Fluoride	Oil	0.0535	-----	0.37	-----
Beryllium	Oil	0.0041	-----	0.03	-----

NOTES: * Refers to the maximum facility emissions (four CTs).
+ Refers to the maximum facility emissions (four DBs).

Sulfuric acid mist emissions assume a maximum of 0.3 percent sulfur in fuel oil for hourly emissions and an average sulfur content of 0.2 percent for annual emissions.

7. Visible emissions shall neither exceed 10% opacity while burning natural gas nor 20% opacity while burning distillate oil.

8. The nitrogen oxide emissions from each combustion turbine unit shall be controlled by using steam injection for both natural gas and fuel oil firing modes.

9. Under the unique circumstances of this case, the Department has determined that the Best Available Control Technology (BACT) NO_x emissions limit is 65 ppm when burning oil and 42 ppm when burning gas and, in addition to complying with BACT at the Lauderdale Plant, FPL shall install "low NO_x" burners on Port Everglades Units 3 and 4 on or before the in service date of the Lauderdale Repowering Project that are capable of achieving a maximum NO_x emission rate which shall not exceed the greater of 0.5 lbs/10^6 BTU, or 75% of the maximum rate determined for the existing Port Everglades Units 3 and 4 burner configuration. The maximum rate shall be determined in a manner acceptable to the Department. Stack testing of NO_x emissions from Port Everglades Units 3 and 4 shall be conducted as part of regularly scheduled annual compliance tests. Should the low NO_x burners prove to be capable of achieving a significantly greater NO_x reduction at the Port Everglades Plant, the Department reserves the right to adjust the applicable pounds per million Btu limit for the Port Everglades Plant accordingly.

10. Initial (I) compliance tests shall be performed on each combustion turbine using both fuels. The stack test for each turbine

shall be performed within 10 percent of the maximum heat input rate for the tested operating temperature. Annual (A) compliance tests shall be performed on each combustion turbine with the fuel(s) used for more than 400 hours in the preceding 12-month period. Tests shall be conducted using EPA reference methods in accordance with the July 1, 1988 version of 40 CFR 60 Appendix A:

a. 5 or 17 for PM (I, A - for oil only)

b. 8 for sulfuric acid mist (I, for oil only)

c. 9 for VE (I, A)

d. 10 for CO (I, A)

e. 20 for NO_x (I, A)

f. 25A for VOC (I, A)

g. 104 for Beryllium (I, for distillate oil only). A fuel analysis for Be using either Method 7090 or 7091, and sample extraction using Method 3040, as described in the EPA solid waste regulations SW 846, is also acceptable

h. ASTM D 2880-71 (or equivalent) for sulfur content of distillate oil (I, A)

i. ASTM D 1072-80, D 3031-81, D 4084-82 or D 3245-81 or equivalent for sulfur content of natural gas (I and A if deemed necessary by DER).

Other DER approved methods may be used for compliance testing after prior DER approval.

11. The average annual sulfur content of the light distillate fuel oil shall not exceed 0.2 percent by weight. The maximum sulfur content of the light distillate fuel oil shall not exceed 0.3 percent. Compliance shall be demonstrated in accordance with the requirements of 40 CFR 60.335 by testing all oil shipments for sulfur content using ASTM D 2880-71 or equivalent, testing for nitrogen content and testing for heating value.

12. Continuous monitoring of steam injection rates shall be installed, operated and maintained in accordance with 40 CFR 60, Subpart GG, for each combined cycle unit.

13. To determine compliance with the oil firing heat input limitation, the Permittee shall maintain daily records of fuel oil consumption for each turbine and monthly records of heating value for such fuel. All records shall be maintained for a minimum of three

years after the date of each record and shall be made available to representatives of DER upon request.

14. The project shall comply with all the applicable requirements of Chapter 17-2, Florida Administrative Code, and the July 1, 1988 version of 40 CFR 60, Subpart GG, Gas Turbines.

15. Any change in the method of operation, fuels or equipment shall be submitted for approval to DER's Bureau of Air Regulation.

16. If start/black start capability for the CTs is provided by a combustion unit, DER shall be notified of the type/model, output capacity, anticipated hours of operation and air emissions of the unit.

17. The Permittee shall have required sampling tests of the emissions performed within 60 days after achieving the maximum turbine firing rate, but not later than 180 days from the start of operation. Thirty (30) days prior to the initial sampling test and fifteen (15) days notice before subsequent annual testing shall be provided to the Southeast District Office. Written reports of the tests shall be submitted to the Southeast District Office within 45 days of test completion.

18. If construction does not commence within 18 months of issuance of this certification/permit, then the Permittee shall obtain from DER a review and, if necessary, a modification of the control technology and allowable emissions for the unit(s) on which construction has not commenced (40 CFR 52.21(r)(2)).

19. Quarterly excess emission reports, in accordance with the July 1, 1988 version of 40 CFR 60.7 and 60.334 shall be submitted to DER's Southeast District Office. Annual reports shall be submitted to the District Office in accordance with Rule 17-2.700(7), Florida Administrative Code.

20. Literature on equipment selected shall be submitted as it becomes available. A CT-specific graph of the relationship between NO_x emissions and steam injection and also another of ambient temperature and heat inputs to the CT shall be submitted to DER's Southeast District Office and the Bureau of Air Regulation.

21. Stack sampling facilities shall be provided for each of the four stacks.

22. Construction period fugitive dust emissions shall be minimized by covering or watering dust generation areas.

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Lawrence E. Sellers, Jr.
Esquire
Holland & Knight, LLP
P. O. Drawer 810
Tallahassee, FL 32301

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* Chip Medley B. Date of Delivery NOV 14 2002

C. Signature
X Chip Medley ☐ Agent ☐ Addressee

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

PARK AVE. TALLAHASSEE FL USPS

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. 7001 0320 0001 3692 7652

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7652

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To Lawrence E. Sellers, Jr.
Street, Apt. No.; or PO Box No. P.O. Drawer 810
City, State, ZIP+4 Tallahassee, FL 32301

PS Form 3800, January 2001 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Mr. Robert J. Sagmeister
Plant Manager
Suwannee American Cement
P. O. Box 410
Branford, FL 32008-0410

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Susan Vaughan — B. Date of Delivery: 11-15-02

C. Signature
X Susan Vaughan ☐ Agent ☑ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2 7001 0320 0001 3692 7676

PS Form 3811, July 1999 Domestic Return Receipt 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 7676

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Robert J. Sagmeister
Street, Apt. No.; or PO Box No.: PO Box 410
City, State, ZIP+4: Branford, FL 32008-0410

PS Form 3800, January 2001 See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Mr. Fred W. Koester
President
Suwannee American Cement Company, Inc.
PO Box 410
Brandford, FL 32008

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Susan Vaughan — B. Date of Delivery: 11-15-02

C. Signature: X Susan Vaughan ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 7645

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To Fred W. Koester
Street, Apt. No.; or PO Box No. PO Box 410
City, State, ZIP+4 Branford, FL 32008

7001 0320 0001 3692 7645

PS Form 3800, January 2001 — See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 5924

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Patrice Boyes
Street, Apt. No.; or PO Box No.: PO Box 1424
City, State, ZIP+4: Gainesville, FL 32602

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Patrice Boyes, Esquire
Boyes and Associates, PA
Post Office Box 1424
Gainesville, FL 32602

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: NADIA CLA
B. Date of Delivery: 5 2003

C. Signature: X [signature] ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7[illegible]

PS[illegible]

102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 5917

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Rodney J. Long
Street, Apt. No.; or PO Box No.: PO Box 2877
City, State, ZIP+4: Gainesville, FL 32602-2877

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Rodney J. Long, Chair
Alachua County Board of
County Commissioners
Post Office Box 2877
Gainesville, FL 32602-2877

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: J. Crow
B. Date of Delivery: 12-19-03

C. Signature
X J. Crow
☐ Agent
☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2 7001 0320 0001 3692 5917

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-00-M-0952

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 5931

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Tom Greenhalgh
Street, Apt. No.; or PO Box No.: 1211 Paul Russell Rd.
City, State, ZIP+4: Tallahassee, FL 32301-7102

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Tom Greenhalgh
1211 Paul Russell Road
Tallahassee, FL 32301-7102

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: JOLYNN GREENHALGH — B. Date of Delivery: 5-31-03

C. Signature: X [signature] — ☐ Agent ☑ Addressee

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

USPS 5-31-03 TALLAHASSEE FL MPO

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 5931

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-99-M-1789

7001 0320 0001 3692 5955

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Lawrence E. Sellers, Jr.
Street, Apt. No.; or PO Box No.: P.O. Drawer 810
City, State, ZIP+4: Tallahassee, FL 32301

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Lawrence E. Sellers, Jr.
Esquire
Holland & Knight, LLP
Post Office Drawer 810
Tallahassee, FL 32301

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Eric Kent
B. Date of Delivery: 5/19/03

C. Signature: X [signature] ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 5955

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-99-M-1789

7001 0320 0001 3692 5948

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Claude Grinfeder
Street, Apt. No.; or PO Box No.: PO Box 410
City, State, ZIP+4: Branford, FL 32008

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

Mr. Claude Grinfeder
Suwannee American Cement
Post Office Box 410
Branford, FL 32008

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Susan Vaughn — B. Date of Delivery: 5-19-03

C. Signature: X Susan Vaughn ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 5948

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 3692 5962

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To: Celso A. Martini
Street, Apt. No.; or PO Box No.: PO Box 410
City, State, ZIP+4: Branford, FL 32008

PS Form 3800, January 2001 — See Reverse for Instructions

SENDER: *COMPLETE THIS SECTION*

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

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Susan Vaughn — B. Date of Delivery: 5-19-03

C. Signature: X Susan Vaughn ☐ Agent ☐ Addressee

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

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

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

7001 0320 0001 3692 5962

PS Form 3811, July 1999 — Domestic Return Receipt — 102595-00-M-0952

55053 5515

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

TALLAHASSEE
NOV 13 02

U.S POSTAGE
037

>>>RTN TO SENDER=UNDELIVERABLE AS ADDRESSED-1

Mr. Chyris Bird
Director
Alachua County Department of
Environmental Regulation
226 S. Main Street
Gainesville, FL 32601

32601-6253

5505 5515
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

TALLAHASSEE FL NOV 13 02

U.S POSTAGE 037 POSTALIA 513235

>>>RTN TO SENDER=UNDELIVERABLE AS ADDRESSED-1

Mr. John Mousa
Alachua County Department of
Environmental Regulation
226 South Main Street
Gainesville, FL 32601

32601-6538 01