



FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
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SECRETARY

January 2, 2013

Electronically Sent – Received Receipt Requested

tomm@suwanneecement.com

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

Re: Request for Additional Information
File No. 1210465-026-AC
Evaluation of Bottom Ash, Mercury and VOC emissions

Dear Mr. Messer:

We received your application on December 7, 2012 to evaluate the use of bottom ash in cement manufacture, expected reduction of mercury emissions and effects on volatile organic compounds (VOC) emissions.

We are well into the review of this very interesting project. We require some additional information to insure it is complete. In accordance with Rule 62-4.055, Florida Administrative Code (F.A.C.), please provide the information requested below within 90 days of receiving this request.

1. Please resubmit page 2 of the application form to show that you are requesting a revision of the existing facility Title V permit concurrently with the air construction permit application. This form is required because the application cover letter includes a request to revise (or correct) a condition in the current Title V permit. [Rule 62-213, F.A.C., Title V Permits]

2. With reference to Page 7 of Attachment 1, the basis of the possible hydrocarbon increase is given as:

“A decreased loss of ignitability (LOI) of the bottom ash compared to fly ash means that it has higher ignitable carbon content. As a result, the use of bottom ash as a raw material supplement may lead to elevated levels of hydrocarbon emissions in the cement-making process”.

Generally speaking, less LOI, meaning “loss on ignition” is usually related to less carbon and less hydrocarbon emissions. Please review and confirm or update the conclusion since it is the main rationale for the temporary requested increase in VOC (or total hydrocarbons).

[62-4.070, F.A.C., Reasonable Assurance]

For any material changes to the application, please include a new certification statement by the authorized representative or responsible official. If you have any questions please contact me at 850-717-9076 or alvaro.linero@dep.state.fl.us.

Sincerely,
(Electronic Signature)

A.A. Linero, P.E.
Office of Permitting and Compliance

cc: Krishna Cole, P.E., Suwannee American CementAC: krishnac@suwanneecement.com
Max Lee, PhD., P.E., Koogler and Associates: mlee@kooglerassociates.com
Khalid AlNahdy, P.E., DEP Northeast District: khalid.alnahdy@dep.state.fl.us