From: Linero, Alvaro
To: "mlee@kooglerassociates.com"; "Cole Krishna"; "Messer Tom"
Subject: 1210465-026-AC, Suwannee American Cement, LLC, Branford Cement Plant, Draft Permit
Date: Thursday, February 21, 2013 5:05:37 PM

Hi Max.

I called as soon as I saw your message.

I hadn't heard that the draft permit was not accessible on-line.

It should be there now if it wasn't there before.

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.026.AC.D_pdf.zip

Fortunately I do thorough write-ups so the basis of the conditions were in the technical evaluation.

Regarding your observation …… "The way I am reading the TEPD is that the BACT limit will still apply as 58 tons per year. Is that the way you are drafting the permit?"

We are lifting the present BACT limit of 0.12 (I think) lb/ton clinker and relying on the potential to emit of some 58 TPY.

That way we can be sure that there will not be a PSD significant increase.

So far, I think SAC has not reached even half that amount in a year even though SAC includes methane and ethane in what is reported.

So I think there is plenty of room within the cap.

In the meantime the present NESHAP of 50 ppmvd THC standard applies (30 operating-day average) along with the 58 TPY cap.

After that, we propose a value of 20 ppm of THC on a 30 operating day basis as the surrogate for the existing VOC BACT.

It is a little more stringent that the value proposed as the NESHAP, but easier to comply with than 0.12 lb/ton clinker because it is corrected for the methane and ethane without having to separately measure and subtract those species.

We'll talk soon I hope.

You can call me anytime over the next 24 hours.

I'll take my phone while walking the dog!

Thanks

Al.

From: Scearce, Lynn
Sent: Thursday, February 21, 2013 4:33 PM
To: Linero, Alvaro
Subject: RE: 1210465-026-AC, Suwannee American Cement, LLC, Branford Cement Plant, Draft Permit

Here is the new link:

Owner/Company Name: SUWANNEE AMERICAN CEMENT CO.
Facility Name: SUWANNEE AMERICAN CEMENT
Project Number: 1210465-026-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: SUWANNEE

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.026.AC.D_pdf.zip

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From: Dr. Max Lee [mailto:mlee@kooglerassociates.com]
Sent: Thursday, February 21, 2013 4:00 PM
To: Linero, Alvaro
Subject: FW: 1210465-026-AC, Suwannee American Cement, LLC, Branford Cement Plant, Draft Permit

Hi Al,

I don't see the draft permit on-line or in the email from Lynn Scearce. I should mention that I was of the understanding from our discussions at lunches and at the SAC office that BACT limits during the trial test of the bottomash would be relaxed and the only the NESHAP would apply. The way I am reading the TEPD is that the BACT limit will still apply as 58 tons per year. Is that the way you are drafting the permit?

Beyond that thought, I have few comments on the TEPD so I need to know when I should officially make the comments for the record.

Thanks,

Max

From: Scearce, Lynn [mailto:Lynn.Scearce@dep.state.fl.us]
Sent: Friday, February 01, 2013 2:44 PM
To: tomm@vcsmc.com
Cc: mlee@kooglerassociates.com; AlNahdy, Khalid; forney.kathleen@epa.gov; ceron.heather@epa.gov; chris@alachuacounty.us; commissioners@suwcounty.org; bocc@alachuacounty.us; lmcshe2001@aol.com; long5892@bellsouth.net; dmot51@aol.com; Linero, Alvaro
Subject: 1210465-026-AC, Suwannee American Cement, LLC, Branford Cement Plant, Draft Permit

Dear Mr. Messer:

Attached is the official **Notice of Draft Permit** for the project referenced below. Click on the link displayed below to access the permit project documents and reply back verifying receipt of the document(s) provided in the link.

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Owner/Company Name: SUWANNEE AMERICAN CEMENT CO.
Facility Name: SUWANNEE AMERICAN CEMENT
Project Number: 1210465-026-AC
Permit Status: DRAFT
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Facility County: SUWANNEE

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/1210465.026.AC.D_pdf.zip

If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Office of Permitting and Compliance.

Lynn Scearce

Office of Permitting and Compliance (OPC)
Division of Air Resource Management – DEP
2600 Blair Stone Road, Mail Stop 5505
Phone: 850-717-9025

Did you know that the Department may not require you to submit a Title V fee for the 2012 calendar year? To learn more, please visit us online at the following web address: www.title5feeholiday.com

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.