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KA 624-12-09
December 5, 2012

Mr. Alvaro Linero
Bureau of Air Regulation
Florida Dept. of Environmental Regulation
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Subject: ***Air Construction Permit Application***
Suwannee American Cement; Facility ID: 1210465

Dear Mr. Linero:

The Suwannee American Cement (SAC), Branford cement plant is submitting the attached permit application to request the permitting of several activities. SAC requests to install and operate the necessary equipment for raw material substitution using coal-derived bottom ash. Bottom ash has been identified to have significantly lower mercury content and will help to significantly reduce mercury emissions. Further, as discussed below, SAC is requesting for a 180-kiln operating day period after installed equipment begins operation and initial injection of bottom ash that FDEP limits of VOC/THC (volatile organic compounds/total hydrocarbons) are held in abeyance. SAC will maintain compliance with EPA limits of THC under the NESHAP program. This 180-day period, similar to allowed startup construction periods under New Source Performance Standards (NSPS), will allow SAC time to evaluate the equipment and impact of bottom ash to reduce mercury emissions and operate the pyroprocessing system using this new material.

SAC also requests a permit to install and operate the equipment necessary to pneumatically transport dust captured through the in-line kiln/raw mill APCD through a fully enclosed system to the finish mill. This process also known as "dust shuttling" will incorporate the dust into the final cement product. The "shuttling" of dust from the APCD has been demonstrated to be an effective means of reducing overall mercury emitted from the facility. The pneumatic transport equipment will extract material from the kiln baghouse, store it in the existing injection fly ash

silo (silo currently not in use), and meter the dust from the silo into a location at the material discharge end of the finish mill.

We are also requesting a revision to the permit language under Specific Condition C.7, note 7 in Title V permit, 1210465-019-AV to read correctly. I have highlighted the suggested changes in bold.

> The averaging time for visible emissions shall be a 6-minute block average computed from a minimum of one measurement every 15 seconds. The 6-minute block averages shall start at the beginning of each hour. The 6- minute block average will contain only valid data points when the preheater feed is being fed into the kiln system or stack flow is ~~not~~ present.

Please feel free to contact me at (352) 377-5822 or mlee@koooglerassociates.com or Krishna Cole, Suwannee American Cement at (386) 935-5023 or krishnac@suwanneecement.com, if you have any questions regarding this request. I sincerely appreciate your time and consideration for this innovative project.

Regards,

Max Lee, PhD., P.E.
KOOGLER AND ASSOCIATES, INC.

cc: Krishna Cole, SAC
Kyle Ulmer, Koogler & Associates, Inc.