



KA 624-12-09  
January 4, 2013

*Electronically Sent – Received Receipt Requested*

[Alvaro.linero@dep.state.fl.us](mailto:Alvaro.linero@dep.state.fl.us)

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

**Subject:***Response to Request for Additional Information dated January 2, 2013  
Air Construction Permit Application  
Suwannee American Cement; Project No. 1210465-026-AC*

Dear Mr. Linero:

Please find enclosed page 2 of the long form application revised as requested. In response to your second item, you are correct that the statement in the application statement needs to be revised. Please use this revised statement for the application:

“A ~~de~~increased loss of ignitability (LOI) of 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.”

Please feel free to contact me at (352) 377-5822 or [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com) or Krishna Cole, Suwannee American Cement at (386) 935-5023 or [krishnac@suwanneecement.com](mailto:krishnac@suwanneecement.com), if you have any questions regarding this information. 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, [krishnac@suwanneecement.com](mailto:krishnac@suwanneecement.com)  
              Kyle Ulmer, Koogler & Associates, Inc., [kulmer@kooglerassociates.com](mailto:kulmer@kooglerassociates.com)

**Purpose of Application**

**This application for air permit is being submitted to obtain: (Check one)**

**Air Construction Permit**

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

**Air Operation Permit**

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit  
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

**Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:**

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

**Application Comment**

**Application is for the -**

- 1) Evaluate the use of bottom ash in cement manufacture and its effects on Hg (expected reduction) and VOC emissions**

**The regulatory analysis and the project description are detailed in Appendix 1.**