

Henry, Danielle D.

From: Bergen, Fawn [Fawn_Bergen@golder.com]
Sent: Tuesday, March 22, 2011 4:18 PM
To: Henry, Danielle D.; Simmons, Wendy
Cc: JPMorris@cemexusa.com; Dibble, Dickson; Ajhar, Rebecca; Schroeder, Bill
Subject: RE: RENEWAL: AIRS ID# 7774817-008-AG; Cemex Construction Materials Florida Inc dba St Catherine Mine

Hi Danielle-

Thank you for your detailed response. CEMEX is planning to proceed with testing all of the emission points that were discussed with Wendy Simmons and as outlined in the VE notification letter.


Thank you,

Fawn Bergen, PE | Senior Project Engineer/Air Quality Services | **Golder Associates Inc.**
2809 E. Harmony Road, Suite 310, Fort Collins, Colorado, USA 80528
T: +1 (970) 484-3857 | F: +1 (970) 484-0383 | C: +1 (970) 692-9912 | E: Fawn_Bergen@golder.com | www.golder.com

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 Please consider the environment before printing this email.

From: Henry, Danielle D. [mailto:Danielle.D.Henry@dep.state.fl.us]
Sent: Tuesday, March 15, 2011 8:18 AM
To: Bergen, Fawn; Simmons, Wendy
Cc: JPMorris@cemexusa.com; Dibble, Dickson; Ajhar, Rebecca; Schroeder, Bill
Subject: RE: RENEWAL: AIRS ID# 7774817-008-AG; Cemex Construction Materials Florida Inc dba St Catherine Mine
Importance: High

Ms. Bergen,

Good morning. It seems we played a little phone tag the end of last week. I did receive your voice mail message and noted you were out of the office Friday and this week but hoped to contact me Monday to discuss further. I do look forward to talking with you but since I didn't hear from you on Monday, I thought it would be a good idea to explain how to move forward. I have copied Mr. Morris on this email to make sure he is also informed.

Although Mr. Dibble has notified you that a re-registration is not needed at this time for the updates to the crushing system emission points, the annual testing of those updated points will be required. The crushing systems are unique pieces of equipment relating to the Air Rules. The entire crushing system is listed as a single emission unit that has requirements under Subpart OOO to test several parts of the crushing system where potential air emissions might occur and these areas are designated as emission points. According to our Air Rules, only major modifications to emission units or additions of a new emission unit that could cause potential air emissions require a permit or revision to a permit. In the case of your client's crushing system, the Department recognizes that you are not modifying or adding a

new emission unit but in fact, updating the emission points related to the crushing system to meet the requirements of Subpart 000. Minor emission point changes are typically handled internally on a as needed basis and requested to be updated during the next permit registration renewal. In your client's case, there were several updates and additions of emission points then what was listed on the most recent registration form. The Department does have the authority to require testing of any emission points that are Subject to Subpart 000 even if the information in the registration does not accurately reflect the equipment on site. Even though the re-registration is not required at this time, testing of all the emission points recently discussed and provided to the Department will be required during the next annual testing and any future annual testing. When the registration is required to be renewed, the updated list of equipment should be provided on the registration form, similar to what you previously submitted. I hope this information is helpful and explains how to move forward. We recently received a notification to conduct annual testing at St. Catherine Mine on March 30, 2011 on the 14 emission points listed in the most recent correspondence to the Department. Feel free to contact me at any time if you have any questions or concerns. We appreciate you and your client's time and cooperation to accurately reflect the operations at the St. Catherine Mine.

Regards,

*Danielle D. Henry
Environmental Compliance Manager
Florida Department of Environmental Protection
Division of Air Resource Management
Southwest District
Business Phone: 813-632-7600 ext. 104
Fax Number: 813-632-7668*



Please consider the environment before printing this email.

From: Bergen, Fawn [mailto:Fawn_Bergen@golder.com]
Sent: Wednesday, March 09, 2011 1:18 PM
To: Simmons, Wendy; Henry, Danielle D.
Cc: JPMorris@cemexusa.com
Subject: FW: RENEWAL: AIRS ID# 7774817-008-AG; Cemex Construction Materials Florida Inc dba St Catherine Mine

Hi Wendy and Danielle-

We are in the process of trying to get the VE test scheduled for the St. Catherine Mine. According to Mr. Dibble below and quoting Rule 62-210.310(2), FAC, re-registration is not needed for this facility since there has been no change in equipment. As he described it to Mr. Morris, AG permits cover equipment, not emission or VE read points. As such, the facility will continue to operate under their current AG permit.

Please advise on how we should proceed with this upcoming VE test.


Thank you in advance,

Fawn Bergen, PE | Senior Project Engineer/Air Quality Services | **Golder Associates Inc.**
2809 E. Harmony Road, Suite 310, Fort Collins, Colorado, USA 80528

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 Please consider the environment before printing this email.

From: Dibble, Dickson [mailto:Dickson.Dibble@dep.state.fl.us]

Sent: Wednesday, March 09, 2011 11:08 AM

To: JPMorris@cemexusa.com

Cc: Veazey, Sandra; Ajhar, Rebecca; Phillips, Cindy; Comer, Patricia; Henry, Danielle D.; Simmons, Wendy; Bergen, Fawn

Subject: RENEWAL: AIRS ID# 7774817-008-AG; Cemex Construction Materials Florida Inc dba St Catherine Mine

Dear Mr. Morris,

Our office has reviewed the Air General Permit (AGP) Registration Form for the St. Catherine Mine Nonmetallic Mineral Processing Plant (NMMP) and the cover letter of Ms. Fawn Bergen of Golder Associates (see attachment), and held subsequent discussions with you, in order to determine the need for a re-registration at this time.

Based on a comparison of DEP's current AGP records for this facility (7774817-008-AG, effective 02/12/09) and the equipment information included in your recent AGP registration submittal (see attachment), it was concluded that there has been no change of equipment at your facility and as a result a re-registration of your facility is not required at this time. Therefore, a refund request will be made for the \$100.00 AGP processing fee which Golder Associates submitted on your behalf to the DEP office.

The above determination was based on the rules following Florida Administrative Code (F.A.C.) rules:

According to Rule 62-210.310(2) (b) 2.a. thru d., F.A.C., re-registration is required for the following reasons:

- a) Impending expiration of the term for air general permit use;
- b) Change of ownership of all or part of the facility;
- c) Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.*; and
- d) Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C.**

Reference:

*Rule 62-210.310(2)(e), F.A.C. - (e) Equipment Changes. The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit.

**Rule 62-210.310(2)(d), F.A.C. - (d) Administrative Corrections. Within thirty (30) days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include:



Dept. of Environmental Protection
Project No. 113-81563

February 24, 2011

Danielle Henry
Florida Department of Environmental Protection
Southwest District Office
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926

FEB 25 2011
Southwest District

**RE: AIR GENERAL PERMIT RE-REGISTRATION – FACILITY ID NO. 7774817
CEMEX CONSTRUCTION MATERIALS FLORIDA, LLC; ST CATHERINE MINE**

Dear Ms. Henry:

Enclosed please find a copy of the Air General Permit Registration form submitted to the Department on February 24, 2011. Based on discussions with Ms. Wendy Simmons of your office, CEMEX Construction Materials Florida, LLC (CEMEX) is submitting this re-registration form for their St. Catherine Mine, located in Sumter County. This form is being submitted to clarify 40 CFR 60 Subpart OOO applicability, emission point numbers and descriptions, and verify emission points subject to visible emissions (VE) testing requirements.

Also enclosed is an emission point summary table and an updated process flow diagram. If you have any questions, please feel free to contact Fawn Bergen, Golder Associates, consultant to CEMEX, at 970.484.3857 or FBergen@golder.com, or James Morris, Environmental Manager at 352.796.3522 or jmorris@cemexusa.com.

Respectfully,

GOLDER ASSOCIATES INC.

A handwritten signature in black ink, appearing to read 'Fawn W. Bergen'.

Fawn W. Bergen, PE
Senior Project Engineer/Air Quality Services

cc: J. Morris, CEMEX

Enclosures: AG Permit Application, EP Summary Table, Process Flow Diagram



**NONMETALLIC MINERAL PROCESSING PLANTS (CRUSHERS)
AIR GENERAL PERMIT REGISTRATION FORM**

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

Instructions: To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (*\$100 as of the effective date of this form*)

Registration Type

Check one:

INITIAL REGISTRATION - Notification of intent to:

- Construct and operate a proposed new facility.
- Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

RE-REGISTRATION (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
- Continue operating the facility after a change of ownership.
- Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

- All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s): _____
- No air operation permits currently exist for this facility.

General Facility Information

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

CEMEX Construction Materials Florida, LLC

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

St. Catherine Mine

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: 3919 County Road 673

City: St. Catherine

County: Sumter - 33513

Zip Code:

Facility Start-Up Date (Estimated start-up date of proposed new facility.)(N/A for existing facility)

N/A (existing)

Owner/Authorized Representative

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: Mr. James Morris, Environmental Manager

Owner/Authorized Representative Mailing Address

Organization/Firm: CEMEX Construction Materials Florida, LLC
Street Address: 11430 Camp Mine Road
City: Brooksville County: Hernando - 34601 Zip Code:

Owner/Authorized Representative Telephone Numbers

Telephone: (352) 796-3522 Fax: (352) 799-0124
Cell phone (optional): (352) 303-3563

Facility Contact (If different from Owner/Authorized Representative)

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)

Print Name and Title: (same as above)

Facility Contact Mailing Address

Organization/Firm:
Street Address:
City: County: Zip Code:

Facility Contact Telephone Numbers

Telephone: Fax:
Cell phone (optional):

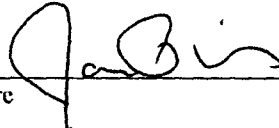
Owner/Authorized Representative Statement

This statement must be signed and dated by the person named above as owner or authorized representative

I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form 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 will promptly notify the Department of any changes to the information contained in this registration form.

Signature



Date

2/24/2011

Type of Facility

Check one:

Stationary Facility

Relocatable Facility

Type(s) of Precautions Used to Prevent Unconfined Emissions

Check all that apply for the management of roads, parking areas, stock piles and yards:

Maintain Roads/Parking/Yards

Use Water Application

Use Dust Suppressant

Remove Particulate Matter

Reduce Stock Pile Height

Install Wind Breaks

Check the location of spray bars at the nonmetallic mineral processing plant:

Feeders

Entrance to "Crusher"

Exit of "Crusher"

Classifier Screens

Conveyor Drop Points

Description of Reasonable Precautions

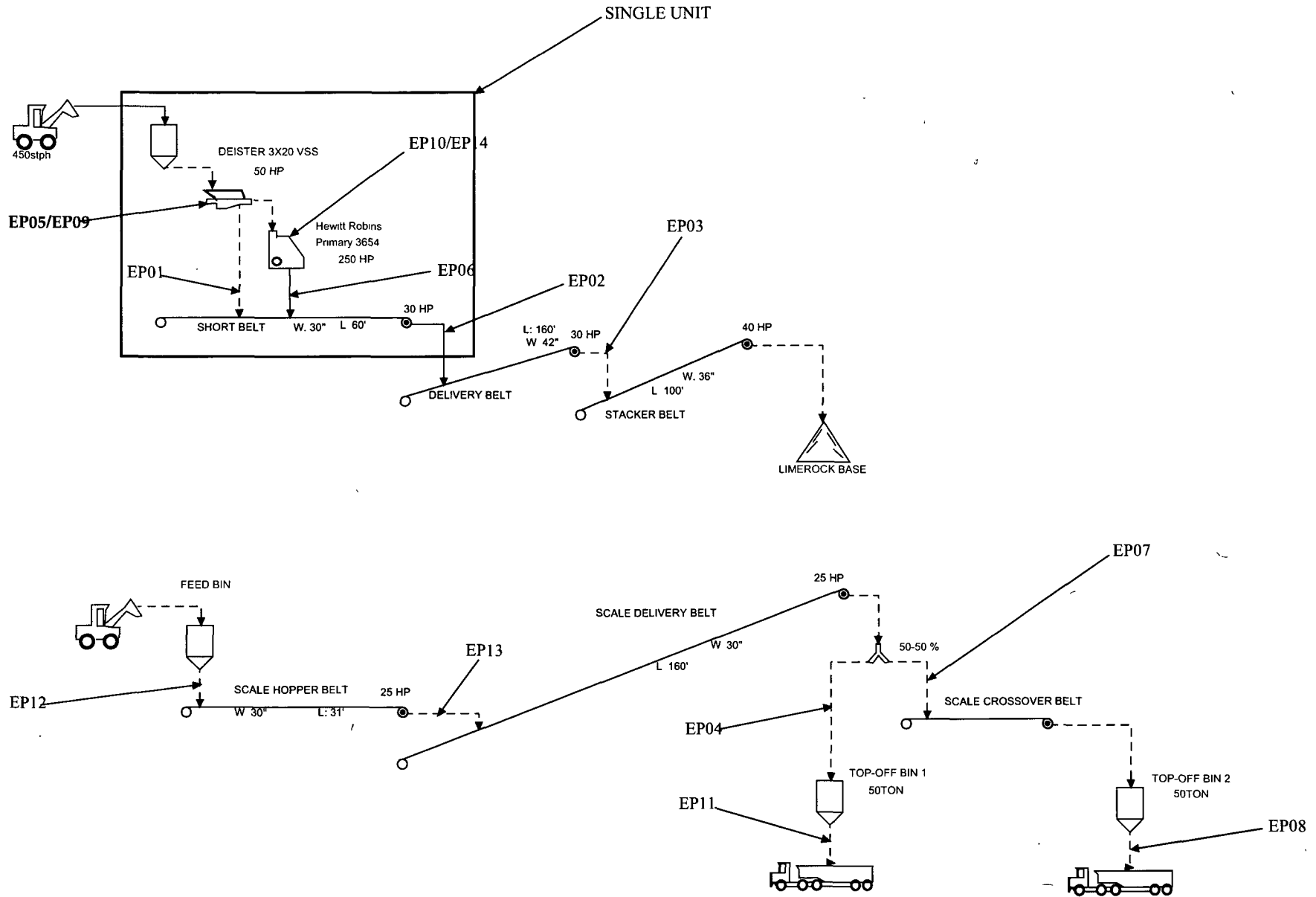
Below, or as an attachment to this form, provide details of all types of reasonable precautions to be used to prevent unconfined emissions at the facility.

The material at the St. Catherine Mine is located below the water line. Therefore, the material has a high moisture content (20-25%) which greatly reduces the generation of fugitive particulate matter emissions. A water truck also sprays water on the roadways to reduce the generation of emissions.

Description of Facility

Below, or as an attachment to this form, provide a description of the nonmetallic mineral processing operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

The St. Catherine Mine is a relocatable limestone processing facility. The facility processes a maximum of 500 TPH and 1,000,000 TPY of limestone. Refer to attached process flow diagram and summary table describing facility emission points, including manufacture or modification dates and 40 CFR Subpart OOO applicability.



Run: 1/6/11 09:03:23

Calculation results may differ due to variations in operating conditions and application of crushing and screening equipment. This information does not constitute an express or implied warranty, but shows results of calculations based on information provided by customers or equipment manufacturers. Use this information for estimating purposes only.

All calculations performed by AggFlow. <http://www.AggFlow.com>

CEMEX
 St. Catherine Quarry
 Mark Morgan
 Date: Feb/24/2011

Summary of Emission Points - CEMEX Construction Materials Florida, LLC; St. Catherine Mine

EP ID No.	Emission Point Description	NSPS OOO Applicable?	VE Limit (%)	VE Read Emission Point ^a
EP01	Diester Screen to Fines Belt (No. 1 Feeder Belt) - Enclosed	Yes	10	EP09
EP02	No. 2 Crusher Under-Belt to Stacker Feed Belt	Yes	10	EP02
EP03	No. 3 Stacker Feeder Belt to Radial Stacker Belt	Yes	10	EP03
EP04	Bi-Directional Belt to Inside Scale Bin (No. 11 Hopper)	Yes	10	EP04
EP05	Diester Screen to No. 12 Crusher Feed Belt (Crusher Inlet) - Enclosed	Yes	15	EP06
EP06	No. 10 Roll Crusher to Crusher Under Belt (Crusher Exit)	Yes	15	EP06
EP07	No. 4 Bi-Directional Belt to Outside Scale Bin	Yes	10	EP07
EP08	Outside Top-off Hopper to Truck (No. 13 Hopper)	Yes	10	EP08
EP09	Crusher Hopper to Diester Screen	Yes	10	EP09
EP10	Fines Belt to Stacker Feeder Belt - Enclosed	Yes	10	EP09
EP11	Inside Top-Off Hopper to Truck	Yes	10	EP11
EP12	Bin Loading Hopper to Riser Conveyor	Yes	10	EP12
EP13	Riser Conveyor to Bi-Directional Belt	Yes	10	EP13
EP14	Crusher Feed Belt to Crusher (Crusher Inlet) - Enclosed	Yes	15	EP06

Note: Emission point description, NSPS applicability and VE observation "read" point, based on determination by FDEP Southwest District Office (W. Simmons), 2011.

^a Since several emission points are enclosed, FDEP has determined that some emission points shall be observed and compliance demonstrated at the location of visible emission points as noted. VE observations at one single read point for some combined emission points. A total of **10 emission points** require annual VE observations.