STATEMENT OF BASIS

Suwannee American Cement L.L.C.
Branford Cement Plant
Facility ID No.: 1210465
Suwannee County

Initial Title V Air Operation Permit
2nd DRAFT Permit No.: 1210465-006-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Facility Description.

This facility consists of a portland cement plant and associated quarry, and raw material and cement handling operations. The plant will combine raw materials and utilize a preheater/precalciner kiln with in-line raw mill to produce clinker. The clinker will be milled and combined with gypsum to produce portland cement. The plant will have a capacity of 210 tons per hour of material fed to the preheater (dry basis), 120 tons per hour of clinker production, and 150 tons per hour of portland cement production. Annual production will be limited (on a rolling 12-month basis) to 1,684,578 tons per year of material fed to the preheater (dry basis), 965,425 tons per year of clinker production, and 1,191,360 tons per year of portland cement production. Fuels allowed to be used in the pyroprocessing system are natural gas, coal, and petroleum coke. The plant will also include a coal processing operation that will crush coal and petroleum coke and will have a monthly processing capacity of 13,360 tons of coal and petroleum coke.

This facility consists of**:**

E.U. ID No.	Brief Description	Emission Point(s)
001	1000 TPH primary crusher and associated unenclosed belt conveyors to raw material storage – fugitive emissions	Fugitive
002	Raw material processing operations controlled by baghouses	(E-28, E-34, G-07, H-08 & H-08A-01 & U02-01)
003	Raw material processing – unenclosed conveyor transfer points – D conveyors	Fugitive
004	In line kiln/raw mill controlled by baghouse – main stack	(E-21)
005	Clinker cooler controlled by ESP	(K-15)
006	Clinker and cement processing operations controlled by baghouses	(L-03, L-06, L-25, M-08, M-09, N-09, N-12, N-36, N-91, Q-14, Q-17, P-03, P-11 & Q-24)
007	Clinker and cement processing – unenclosed conveyor transfer points – M conveyors	Fugitive
008	Coal mill and coal transfer system controlled by baghouses	(S-17 East, S-17 West & S-21)
009	Unenclosed coal conveying equipment – S conveyors	Fugitive
010	Natural gas fired emergency generator set [1]	

[1] Emissions unit 010 is exempt from permitting (exempt emissions unit) pursuant to Rule 62-210.300(3)(a)20, F.A.C., provided that total fuel consumption by the generator is limited to 4.4 million cubic feet per year of natural gas. The owner or operator should maintain records of annual fuel consumption of the generator to verify that this emissions unit remains exempt. This emissions unit is subject to the facility-wide specific conditions of section II of this permit. Estimated maximum potential emissions from the generator set are: NOx, 8.5 lb/hr, CO 4.1 lb/hr, and VOC 0.5 lb/hr.

EU001: In-pit primary crusher with belt conveyor transfer points unloading at raw material storage.

The provisions of 40 CFR 60 Subpart OOO are applicable to these affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher or belt conveyor**.**
[40 CFR 60.670]

40 CFR 60 Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants (40 CFR 60.670 – 60.676) and 40 CFR 60 Subpart A, revised as of July 1, 1997. Rule 212.400(5), F.A.C., Prevention of Significant Deterioration (PSD); Rule 62-212.400(6), F.A.C., Best Available Control Technology (BACT) Determination, dated June 1, 2000

EU002-007:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
002	Raw material processing operations controlled by baghouses
003	Raw material processing – unenclosed conveyor transfer points – D conveyors
004	In line kiln/raw mill controlled by baghouse – main stack
005	Clinker cooler controlled by ESP
006	Clinker and cement processing operations controlled by baghouses
007	Clinker and cement processing – unenclosed conveyor transfer points – M conveyors

40 CFR 60 Subpart F, Standards of Performance for Portland Cement Plants (40 CFR 60.60 – 60.66) and 40 CFR 60 Subpart A, revised as of July 1, 1997 have been subsumed by 40 CFR 63 Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry.

These emissions units are subject to 40 CFR 63 Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry (40 CFR 63.1340 – 63.1359), revised as of May 14, 1999 and 40 CFR 63 Subpart A, revised as of February 12, 1999. These emissions units are also subject to the requirements of the state rules as indicated in this permit, particularly Rule 62-212.400, F.A.C., Prevention of Significant Deterioration, effective February 5, 1998. Emissions units 004 and 005 are subject to Rule 62-296.701, F.A.C., Portland Cement Plants, and effective March 2, 1999.

The Department adopted the provisions of 40 CFR 63 Subpart LLL by reference into Rule 62-204.800, F.A.C., effective October 1, 1999. The provisions are included in this permit.

EU004:

In line kiln/raw mill controlled by baghouse – main stack. The references to tire burning and tire derived fuel is not included in the Title V permit because the tire gasification system has not been installed.

EO008 & 009:

EMISSIONS UNIT NO.	EMISSIONS UNIT DESCRIPTION
008	Coal Mill and Coal Transfer System controlled by baghouses
009	Unenclosed Coal Conveying Equipment – S Conveyors

The provisions of 40 CFR 60 Subpart Y are applicable to these affected facilities.

Emissions units 008 and 009 are subject to 40 CFR 60 Subpart Y, Standards of Performance for Coal Preparation Plants (40 CFR 60.250 – 60.254) and 40 CFR 60 Subpart A, revised as of July 1, 1997. These emissions units are also subject to the requirements of the state rules as indicated in this permit, particularly the requirements of Rule 62-212.400, F.A.C., Prevention of Significant Deterioration, effective February 5, 1998.

For (EU008) emission points S-17 East, S-17 West, S-21 and EU009: Compliance testing for PM emissions from these emission points are waived and an alternative standard of 5% opacity is imposed, pursuant to Rule 62-297.620(4), F.A.C. If the Department has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated using EPA Method 5, as described in 40 CFR 60 Appendix A (1997 version). [Rules 62-4.070(3), 62-297.310 and 62-297.620(4), F.A.C. and BACT]

The BACT emission limits of this permit for these emissions unitsare as stringent or are more stringent than the emission limits imposed by otherwise applicable rules.

CAM **does** apply.

Also included in this permit are miscellaneous unregulated/exempt emissions units and/or activities.

Based on the initial Title V permit application received **August 18, 2003** this facility **is a major source** of hazardous air pollutants (**HAPs**).