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May 6, 2013

Via email only

Mr. Alvaro Linero

alvaro.linero@dep.state.fl.us

Bureau of Air Regulation

Florida Dept. of Environmental Regulation

2600 Blair Stone Road, MS 5500

Tallahassee, Florida 32399-2400

Subject: Modification of AC Permit Application 0250020-035-AC

Dear Mr. Linero,

On behalf of Titan America I am submitting two modifications to the AC application that is currently under review (FDEP permit project number 0250020-035-AC). The first request is to remove the requirement for SO₂ CEMS monitoring. The following table shows the emissions data from the SO₂ CEMs since the SO₂ monitor was installed.

Year	SO ₂ TONS	Clinker Production
2006	5	1714239
2007	16	1390239
2008	5	1259556
2009	5	808512
2010	4	712691
2011	10	845600
2012	6	935308

The CEM data show that the inherent nature of lime scrubbing (i.e., basic) reduces SO₂ emission with excellent efficiency. Because the lime scrubbing is a fundamental behavior in operation of the kiln, the control of SO₂ occurs at all times of clinker production. The emissions are significantly lower than 100 tpy and are on the edge of being less than 5 tpy (2006-2012 annual average of 7.3 tpy). As such we are requesting that the emissions testing be only required upon permit renewal using EPA Method 6c. In addition, upcoming requirements for HCl CEM monitoring per federal regulations will help to ensure that SO₂ emissions remain low. As you are aware, the EPA has stated that HCl is an effective surrogate for SO₂ monitoring by allowing use of SO₂ CEM monitoring as a surrogate for HCl controlled by scrubber.

The second request is to revise EU036 – Emergency Generator which serves various emission units throughout the facility (backup unit in the event of power outage or equipment maintenance for the cement packhouse (EU 016), cement silos (EU 014, and 015), and cementitious material sack loadout operations (EU 032)). This unit includes a diesel engine that has been regulated in the permit as subject to 40 CFR 63 ZZZZ. The engine unit, by design, is a portable engine and should be listed as an unregulated emissions unit. A similar circumstance occurred recently with the exact same model air compressor unit with facility ID 0050071. The picture below shows the unit.



Reference:

<http://www.sullair.com/Americas/en/Products/Portable+Air+Power/Portable+Compressors/1300+-+1600+cfm>

In an EPA determination dated 12/05/2008 (Control No. M090038, attached), a determination was made confirming that a portable engine is a non-road engine, as long as it is move from a single location once every 12 consecutive months. This applies to this portable emergency generator which will be used throughout the facility, at multiple locations, throughout 12 consecutive months, and qualifies as non-road engines and not be applicable to IIII or ZZZZ.

If you have any questions or would like to discuss this matter please contact me.

Sincerely,

A handwritten signature in black ink, appearing to be "M. Lee".

mlee@kooglerassociates.com

Cc: M Khan, Titan America LLC (MKhan@titanamerica.com)

Enc: EPA determination control No. M090038