

STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 1210465-065-AV

APPLICANT

The applicant for this project is Suwannee American Cement Company, LLC. The applicant's responsible official and mailing address are: Mr. Horacio Terron, Plant Manager, Suwannee American Cement Company, LLC, Branford Cement Plant, 5117 U.S. Highway 27, Branford, Florida 32008.

FACILITY DESCRIPTION

The applicant operates the existing Branford Cement Plant, which is in Suwannee County at 5117 US Highway 27, Branford, Florida.

This facility consists of a portland cement manufacturing plant, associated limestone quarry, and raw material and cement handling operations. Limestone is mined, stockpiled, and then mixed with other raw materials which provide an additional source of calcium, silica, iron and aluminum, in designed proportions, to produce a ground mixture of kiln feed (or raw meal). The additional raw materials used may include but are not limited to coal ash, bauxite, sand, and mill scale. The plant combines raw materials and utilizes a preheater/calcliner kiln system with in-line raw mill (pyroprocessing system) to produce cement clinker. The clinker is milled and combined with gypsum and limestone to produce portland cement.

The plant has a capacity of 210 tons per hour of dry preheater feed materials, 120 tons per hour of clinker production, and 150 tons per hour of portland cement production. Annual production is limited to the following 12-month rolling totals: 1,684,578 tons per year of dry preheater feed materials, 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, petroleum coke, and alternative fuels. The plant includes a coal processing operation that crushes coal and petroleum coke and has a monthly processing capacity of 13,360 tons of coal and petroleum coke. The plant also includes alternative fuel processing operations.

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

REGULATED EMISSIONS UNIT IDENTIFICATION NUMBERS AND DESCRIPTIONS

EU No.	Brief Description
001	Quarry Operations
002	Raw Materials Processing Operations - Raw material storage up to the preheater and includes recycling of captured PM.
003	Raw Material Processing - Unenclosed Conveyor/Transfer Points
004	Pyroprocessing System: In Line Kiln/Raw Mill
005	Clinker Cooler
006	Clinker and Cement Processing Operations - Activities include cement being transferred to storage silos from the finish mill and transferred from a silo.
007	Clinker and Cement Processing - Unenclosed Conveyor Transfer Points
008	Coal Mill and Coal Transfer System
009	Unenclosed Coal Conveying Equipment
011	Alternative Fuels Processing

APPLICABLE REGULATIONS

Based on the Title V air operation permit renewal application received on April 9, 2025, this facility is a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD)

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major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table:

Regulation	EU No(s).
Federal Rule Citations	
40 CFR 60, Subpart A - New Source Performance Standards, General Provisions	001, 002, 003, 004*, 005, 006, 007, 008, 009
40 CFR 60, Subpart F - Standards of Performance for Portland Cement Plants.	002, 003, 004*, 005, 006, 007
40 CFR 60, Subpart Y - Standards of Performance for Coal Preparation Plants	008, 009
40 CFR 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants	001
40 CFR 63, Subpart A - National Emission Standards for Hazardous Air Pollutants, General Provisions	002, 003, 004*, 005, 006, 007
40 CFR 63, Subpart LLL - National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry	
State Rule Citations	
Chapter 62-4, F.A.C.; Permits	All
Chapter 62-204, F.A.C.; Air Pollution Control - General Provisions	
Rule 62-204.800, F.A.C.; Federal Regulations Adopted by Reference	001, 002, 003, 004*, 005, 006, 007, 008, 009
Chapter 62-210, F.A.C.; Stationary Sources - General Requirements	All
Rule 62-212.400(Prevention of Significant Deterioration), F.A.C.; Determinations of the Best Available Control Technology (BACT)	
Chapter 62-213, F.A.C.; Operation Permits for Major Source of Air Pollution	
Chapter 62-296, F.A.C.; Stationary Sources - Emission Standards	
Chapter 62-297, F.A.C.; Stationary Sources - Emissions Monitoring	

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to renew the existing Title V air operation permit for the above referenced facility.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

- Application for a Title V air operation permit renewal received April 9, 2025.
- Draft Title V air operation permit renewal issued May 12, 2025.
- Public Notice of Intent to Issue Air Permit published on Month day, 2025.
- Proof of publication (affidavit) of Public Notice of Intent to Issue Air Permit received on Month day, 2025.
- Proposed Title V air operation permit renewal issued Month day, 2025.
- Final Title V air operation permit renewal issued Month day, 2025.

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3241 - Cement, Hydraulic.

North American Industry Classification System (NAICS): 327310 - Cement Manufacturing.

HAP: The facility is identified as a major source of hazardous air pollutants (HAP).

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Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.). Facility-wide potential emissions of PM/PM₁₀, SO₂, NO_x and CO exceed 100 tons/year. HCl exceeds 10 tons/year, and total HAPs exceed 25 tons/year.

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any of the units at the facility.

GHG: The facility is identified as a major source of greenhouse gas (GHG) pollutants.

State CISWI plan & federal CISWI plan:

“Rule 62-204.800(9)(f), F.A.C.” is also referred to as the “Florida (state) CISWI plan” or the “Florida 111(d) plan.”

“40 CFR 62, Subpart IIIa” is also referred to as the “Federal CISWI plan.” It became effective on January 10, 2025.

Critical events

2014

- FDEP Submits initial state CISWI plan.

2017

- 01/11/2017 U.S. EPA proposed federal CISWI plan.
- 05/31/2017 FDEP submits proposed revision to FDEP’s state CISWI plan to incorporate alternative Hg limit.

2020

- FDEP revises its CISWI plan to also incorporate an alternative PM limit. FDEP does not submit this second proposed revision to U.S. EPA for approval.

2024

- 12/11/2024 U.S. EPA finalizes the federal CISWI plan (incorporated into 40 CFR 62 Subpart IIIa) which has an alternative mass-based Hg limit but not mass-based PM limit.
- federal CISWI plan sets the effective date of 01/10/2025 with 180 days to demonstrate compliance (July 9, 2025).

2025

- at the time of this permit renewal application, U.S. EPA Region IV had not yet approved the state CISWI plan (FDEP 2017 version).
- this Title V permit renewal was revised, adding into it the conditions from the currently applicable federal CISWI plan but maintains the current information of the FDEP state CISWI plan.

PROJECT REVIEW

Changes were made in this Title V air operation permit renewal. The major changes made in this project are overviewed here. Some changes were made in the format of this renewed Title V air operation permit.

Statement of Basis (SOB)

- The Department uses standardized documents in Title V air operation permits. This SOB document was revised to include more information related to Title V source applicability, e.g., the air pollutants for which the facility is major.

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Permit

- Subsection II. Facility-wide Conditions. A revision is made to FW5 item 9 to include “or cover” as acceptable covering for the storage of raw materials at the plant. The boundary provided in this permit renewal application between the quarry and plant applies to FW5.



- Subsection II. Facility-wide Conditions. A new reporting summary condition was added. The condition summarizes all reports required under the Title V air operation permit. See Specific Condition FW11.
- Subsection III.A. Quarry Operations (EU001). Added Specific Condition A.12. to specify NSPS 40 CFR 60 Subpart OOO reporting.
- Subsection III.B. Raw Materials Processing Operations (EU002 & 003).
 - Updated the equipment in EU003 to include that inside the covered Raw Material Storage Building (RMSB) there is a new alternate additive feeder system. This transfer point was added to the list of transfer points for EU003 as an unenclosed transfer point, “C15 RMSB Additive Feeder System.”
 - Added a Permitting Note after the Common Testing Requirements condition to inform the permittees about the availability of submitting test notifications on-line. The Permitting Note was added to Specific Condition B.10.
- Subsection III.C. Pyroprocessing System - In Line Kiln/Raw mill (004). Added conditions and emission limits from the federal CISWI Plan 40 CFR 62, Subpart IIIa.
 - Added a Permitting Note after the Common Testing Requirements condition to inform the permittees about the availability of submitting test notifications on-line. The Permitting Note was added to Specific Condition C.19.
 - Revised emission limits and references to the federal CISWI plan. Emission limit values were revised for Hg and PM. See Specific Condition C.30.
- Subsection III.D. Clinker Cooler (005, 006, 007).
 - Added a Permitting Note after the Common Testing Requirements condition to inform the permittees about the availability of submitting test notifications on-line. The Permitting Note was added to Specific Condition D.30.
- Subsection III.E. Coal Mill and Coal Transfer System (008, 009).
 - Added a Permitting Note after the Common Testing Requirements condition to inform the permittees about the availability of submitting test notifications on-line. The Permitting Note was added to Specific Condition E.13.

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- Subsection III.F. Alternative Fuels Processing (011). The description of Engineered Fuel was revised to include several specific EFs that meet the description. A permitting note was added to clarify that law enforcement contraband and narcotics are permitted to be burned in the kiln system. See the last two sentences of Specific Condition F.3.

Appendices & Attachments

- Version dates were added in the header section of many of the individual appendices documents. The “version dated” phrase represents the latest date the document had been updated. For example, Appendix NSPS Subpart A - General Provisions for 40 CFR 60 (version dated 11/17/2023).
- Appendix BO&MP, BACT Operation and Maintenance Plan (EU 004 & EU 008) was updated to reflect the revision 3 dated April 9, 2025.
- Appendix CISWI Site Specific Monitoring Plan (state & federal plan) (EU 004). Added to the permit. The plan’s date is April 4, 2025.
- Appendix CISWI Waste Management Plan (state & federal plan) (EU 004). Added to the permit. The plan’s date is September 2, 2016.
- Appendix I, List of Insignificant Emissions Units and/or Activities. Added a few insignificant emissions unit and/or activity {see the activities numbered as 18. & 19.}.
- Federal Regulation Appendices (NESHAP, NSPS). The appendices for the federal regulations were updated, replacing previous outdated ones.
- Appendix Rule 62-204.800(9)(f), F.A.C. Updated rule language was added. These adoptions were as of July 1, 2021.
- Appendix Rule 40 CFR 62 Subpart IIIa - Federal CISWI Plan. Added to permit.
- The Department uses standardized appendices in Title V air operation permits. The following standardized appendices were updated in this renewed permit (the new version date is indicated here):
 - Appendix RR, Facility-wide Reporting Requirements (Version Dated 02/14/2025).
 - Appendix TV, Title V General Conditions (Version Dated 02/14/2025).
- Appendix U, List of Unregulated Emissions Units and/or Activities. Assigned EU 016 to those listed.
- Table H, Permit History. Updated to include projects issued subsequent to Permit No. 1210465-061-AV.

CONCLUSION

This project renews Title V air operation permit No. 1210465-050-AV, which was effective on November 25, 2020. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.