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NO _____

DEC 06 2002

BUREAU OF AIR REGULATION

THE GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA

STATE OF FLORIDA
COUNTY OF ALACHUA

Naomi Williams-Jordan

Before the undersigned authority appeared.....
Classified Assistant Manager

Who on oath says that he/she is.....of THE GAINESVILLE SUN, a daily
newspaper published at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a
PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

.....
CEMENT PLANT – NEWBERRY, FL. Draft Air Construction/ Permit No. 0010087-006AC (PSD-FL-228C)
in the matter of

in the.....Court, was published in said newspaper in the issue o
NOVEMBER 20TH
.....2002

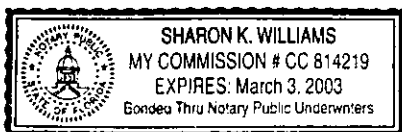
Affidavit further says that the said THE GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said Alachua County, each day, and has been entered as second class mail matter at the post office in Gainesville, in Said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy Of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount for publication in the said newspaper.

Sworn to and subscribed before me this

4 day of Dec A.D., 2002

Sharon K. Williams
(seal) Notary Public

Naomi Williams-Jordan



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LEGAL NOTICES

PUBLIC NOTICE
OF INTENT TO
ISSUE AIR
CONSTRUCTION
PERMIT

Florida Department of
Environmental Protection
FLORIDA ROCK
INDUSTRIES, INC.
Thompson S. Baker
Cement Plant - Newberry
Alachua County
Draft Air Construction
Permit No. 0010087-006-
AC (PSD-FL-228C)

The Florida Department of
Environmental Protection
(Department) gives notice
of its intent to issue an Air
Construction Permit to
Florida Rock Industries,
Inc. (FRI) to increase produc-
tion at the Thompson
S. Baker Cement Plant
located 2.5 miles North-
east of Newberry on
County Road 235 in Ala-
chua County. A new Best
Available Control Technol-
ogy (BACT) determination
was not required. The
applicant's name and
address are: Florida Rock
Industries, Inc., 155 East
21st Street, Jacksonville,
Florida 32206.
FRI requests an increase
in its daily clinker produc-
tion limit from 2,300 tons
per day (TPD) to 2,650
TPD and in annual produc-
tion from 712,500 tons
per year (TPY) to 800,000
TPY. The company pro-
poses reductions in allow-
able emission limits per
unit of production (lb/ton
of clinker) such that there
will be no annual emis-
sion limit increases. The
production limit increase
is approximately 12 per-
cent while the annualized
maximum allowable emis-
sions decrease a total
approximately 15 percent
compared with the exist-
ing permits. The Depart-
ment is already required
by the previous construc-
tion permit to set final
emission limits for sulfur
dioxide (SO₂), and
beryllium after receipt of
emission testing results.
The final production and
emission limits represent
the as-built capabilities of
the plant. The final con-
struction activity was the
installation of a multi-
stage combustion (MSC)
calciner that made it pos-
sible for the kiln to reliably
meet a nitrogen oxides
emission limit of 2.8 lb
NO_x/ton clinker (previ-
ously 3.8 lb/ton) effective
January 1, 2002. The
Department presumes
that the present federally
enforceable allowable
emissions for the affected
units are equivalent to the
actual emissions of the
emissions unit. The pro-
posed production
increase will not result in
significant net emissions
increases and a new eval-
uation under the rules for
the Prevention of Signifi-
cant Deterioration (PSD)
is not required.

The final limit proposed
no NO_x of 2.45 lb/ton of
clinker (30-day basis) is
one of the lowest in the
country compared with
recent BACT determina-
tions for new projects. The
limit for SO₂ of 0.16 lb/ton
of clinker is the lowest
limit issued to date in the
country. It reflects the use
of raw materials that are
inherently low in sulfur as
well as very efficient
scrubbing of combustion
gases by finely divided
lime in the calciner. Stack
tests indicate very low
emissions of beryllium
from the plant. The federal
PSD program no longer
requires regulation of
beryllium. Beryllium is
now regulated under the
1999 federal cement
industry maximum achiev-
able control technology
(MACT) standards and
only at cement kilns that
(unlike FRI) burn hazard-
ous waste.

The plant has continuous
emissions monitoring
equipment for NO_x, SO₂,
opacity and total hydro-
carbons as well as annual
testing requirements for

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LEGAL NOTICES

are set forth below. Medi-
ation is not available in
this proceeding.

A person whose substan-
tial interests are affected
by the proposed permit-
ting decision may petition
for an administrative pro-
ceeding (hearing) under
Sections 120.569 and
120.57, F.S. The petition
must contain the informa-
tion set forth below and
must be filed (received) in
the Office of General
Counsel at 3900 Common-
wealth Boulevard, Mail
Station #35, Tallahassee,
Florida, 32399-3000. Peti-
tions must be filed within
fourteen (14) days of pub-
lication of this Public
Notice of Intent to Issue
Air Construction Permit.
Under Section 120.60(3),
F.S., however, petitions
submitted by person(s)
who asked the Depart-
ment for notice of agency
action must be filed
within fourteen (14) days
of receipt of that notice or
the date of publication of
the public notice which-
ever occurs first. A peti-
tioner shall mail a copy of
the petition to the appli-
cant at the address indi-
cated above at the time of
filing. The failure of any
person to file a petition
within the appropriate
time period shall consti-
tute a waiver of that per-
son's right to request an
administrative determina-
tion (hearing) under Sec-
tions 120.569 and 120.57,
or to intervene in this pro-
ceeding and participate
as a party to it. Any sub-
sequent intervention will
be only at the approval of
the presiding officer upon
the filing of a motion in
compliance with Rule 28-
106.205, F.A.C.

A petition that disputes
the material facts on
which the Department's
action is based must con-
tain the following infor-
mation: (a) The name and
address of each agency
affected and each agen-
cy's file or identification
number, if known; (b) The
name, address, and tele-
phone number of the peti-
tioner, the name, address,
and telephone number of
the petitioner's represen-
tative, if any, which shall
be the address for service
purposes during the
course of the proceeding;
and an explanation of
how the petitioner's sub-
stantial interests will be
affected by the agency
determination; (c) A state-
ment of how and when
petitioner received notice
of the agency action or
proposed action; (d) A
statement of all disputed
issues of material fact. If
there are none, the peti-
tioner must so indicate; (e)
A concise statement of
the ultimate facts alleged,
including the specific
facts the petitioner con-
tends require reversal or
modification of the agen-
cy's proposed action; and
(g) A statement of the
relief sought by the peti-
tioner, stating precisely
the action petitioner
wishes the agency to
take with respect to the
agency's proposed action.
A petitioner that does not
dispute the material facts
upon which the Depart-
ment's action is based
shall state that no such
facts are in dispute and
otherwise shall contain
the same information as
set forth above, as
required by Rule 28-
106.301, F.A.C.
Because the administra-
tive hearing process is
designed to formulate
final agency action, the
filing of a petition means
that the Department's
final action may be differ-
ent from the position
taken by it in this notice.
Persons whose substan-
tial interests will be
affected by any such final
decision of the Depart-
ment on the application
have the right to petition
to become a party to the
proceeding, in accor-

carbon as well as testing requirements for all of the regulated pollutants. The plant is subject to 40CFR63, Subpart LLL, which requires annual testing for dioxin and furans as well as specific operating parameters for the pollution control equipment.

The Department will issue the Final Permit with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. The Department will accept written comments concerning the proposed permit issuance action for a period of fourteen (14) days from the date of publication of this Public Notice of Intent to Issue Air Construction Permit. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing

in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive,
Suite 4
Tallahassee, Florida
32301
Telephone: (850) 488-0114
Fax: (850) 922-6979

Department of Environmental Protection
Northeast District Office
7825 Baymeadows Way,
Suite 200B
Jacksonville, Florida
32256-7590
Telephone: (904) 807-3233
Fax: (904) 448-4363

The complete project file includes the technical evaluation, Draft Air Construction Permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. The technical evaluation and draft permit can be viewed at www.dep.state.fl.us/air/permitting/construct.htm in the Florida Rock Newberry link.

(#24212) 11/20

November 22, 2002

Mr. A.A. Linero
Administrator, New Source Review Section
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Mail Station #5505
Tallahassee, Florida 32399-2400

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NOV 26 2002

BUREAU OF AIR REGULATION



Re: Draft Air Construction Permit No: 0010087-006-AC (PSD-FL-228C)
Comments by Applicant Florida Rock Industries, Inc.

Dear Mr. Linero:

Our comments concern the amount of kiln feed required to produce a given quantity of clinker. Both kiln feed and clinker are used as bases for permitted emissions in subject application.

Under Section III, Emission Unit, Specific Conditions, EU 003 Kiln System, Specific Condition 1, the ratios of kiln feed to clinker are shown for the various production rates, expressed in tons per hour (TPH), tons per day (TPD) and tons per year (TPY), both for clinker and the respective amounts of kiln feed required to produce this amount of clinker.

Both the original construction permit No.: 0010087-001-AC and the new draft permit contain the correct ratios of kiln feed to clinker. Florida Rock 's comments have to do only with the definition of kiln feed as seen by the plant's weigh scales, which measure both the 'kiln feed' and the circulating dust load.

Owing to the location of the measuring point of the amount of material fed into the preheater, the quantity of feed represents both the new 'kiln feed' and the dust recycled from the various pollution control devices, which include the ESP and a nuisance dust collector, which vents the kiln feed transport system.

The streams of 'kiln feed' and recycled dust are combined prior to measuring and controlling the total flow of material into the lift pump, which conveys the material to the preheater.

To account for this circulating load, the amount expressed as kiln feed must be increased appropriately to produce the permitted amount of clinker.

Measurements of clinker production and careful tracking of new feed production by the raw mill have shown the average circulating load to be 10.4 tons per hour. When this amount is added to the 'kiln feed' rate of 173 TPH to produce the permitted amount of

Page 2

clinker of 110.5 TPH, the feed rate measured by the scale and reported by the process control devices is actually 183.4 TPH.

We respectfully request, therefore that the department recognizes the existence of the circulating dust load and agrees that the 'kiln feed' rate as seen by the scale must be increased by the amount of the recycled dust.

The above comments are for clarification only and are not intended to nor should they have any effect on the draft permit as written.

Two block flow diagrams are attached to illustrate the flow conditions.

Attachment 1 shows the flow as depicted in the draft permit.

Attachment 2 shows the actual flow and the point of measurement including the recycled dust.

We would very much appreciate your considering making these comments a part of the final permit when granted.

Sincerely,



Fred W. Cohrs

Consultant to Florida Rock Industries, Inc.

FWC/

Attachments

Kiln Feed Storage

Kiln Feed
173 TPH normal
180 TPH Max
1,360,000 TPY max

Preheater/Kiln

Clinker
110.2 TPH normal
115.5 TPH Max
2650 TPD normal
800,000 TPY max

Clinker Storage



Thompson S. Baker

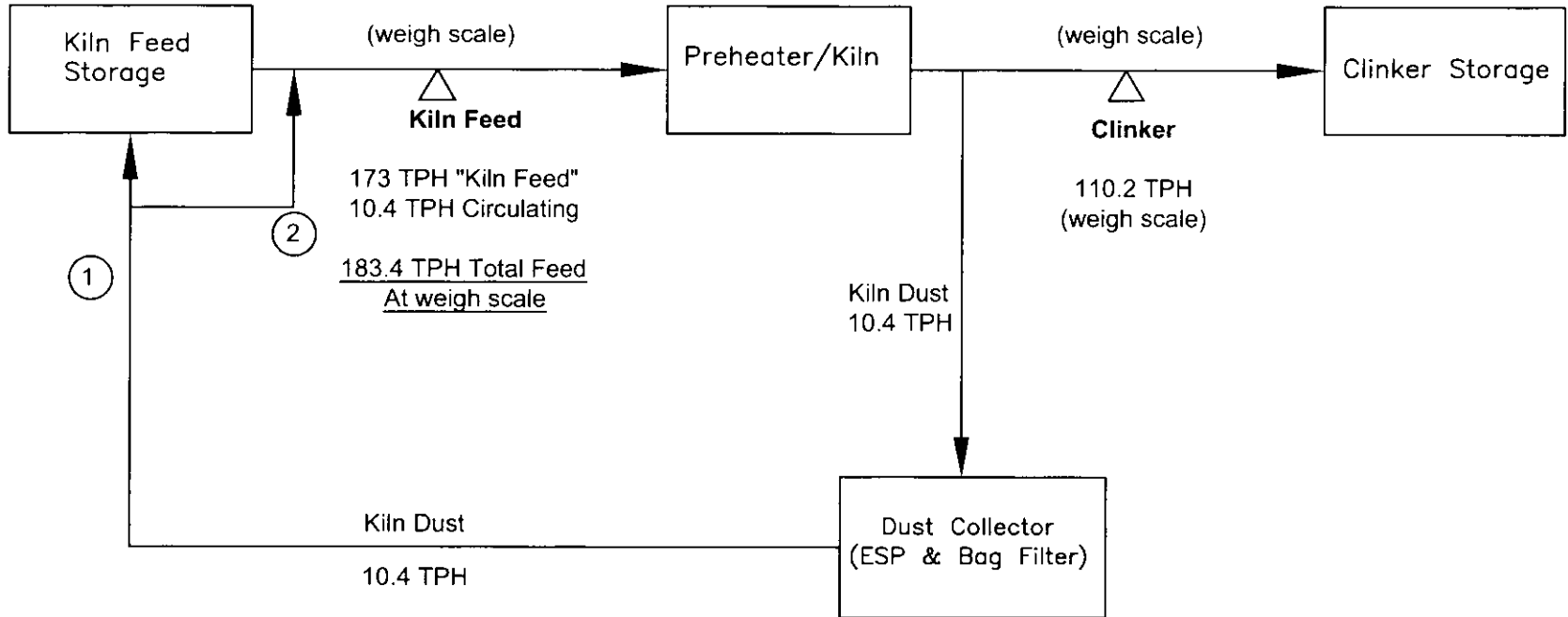
Cement Plant

Florida Rock Industries, Inc.

Material Flow Block Diagram
As expressed in Draft Air
Construction Permit No:
0010087-006-AC

SCALE

Attachment 1



Note 1 - Direction of flow with raw mill operating

Note 2 - Direction of flow with raw mill down



Florida Rock Industries, Inc.

Material Flow Block Diagram
Actual Flow of Materials
and Measuring Points

Thompson S. Baker

Cement Plant

SCALE

Attachment 2



ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352-377-5822 • FAX 377-7158

Project No. 187-02-05

Fax

To: <u>Dreg De Angelo</u>	
Fax No.: <u>850-922-6979</u>	
From: <u>Dr Koogler</u>	Fax No.: <u>352-377-7158</u>
Date: <u>12/5/02</u>	Time: <u>5:00</u>
Sent By: <u>gal</u>	

*This message consists of 1 page(s) PLUS this cover sheet.
If you experience difficulties with this transmission, please call 352-377-5822.*

Remarks:

This message is intended for use only by the individual to whom it has been addressed, and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at 352-377-5822 so we can prevent any recurrence. Thank you.



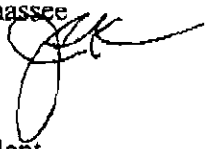
KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

187-02-05

Memorandum

Via Fax: 850-922-6979

TO: Greg DeAngelo, FDEP, Tallahassee
FROM: John B. Koogler, Ph.D., P.E. 
DATE: December 5, 2002
SUBJECT: Florida Rock Industries, Inc.
Thompson S. Baker Cement Plant
Comments on Draft Permit 0010087-006-AC (PSD-FL-228C)

For the record, I would like to provide comments on two of the conditions related to the operating requirements of the NO_x and SO₂ CEMS for the above captioned facility. Specific Condition 3 of the above captioned draft air construction permit addresses these conditions.

Specific Condition 3(d) establishes criteria for the operating times of both the NO_x and SO₂ CEMS; including the requirement that data shall be obtained for 75 percent of the operating hours per day. As I discussed with you, I think it would be less confusing if the operating requirements of the two CEMS were made consistent with the operating requirements specified in Federal New Source Performance Standards (40 CFR 60.7) and the requirements of Federal NESHAP (40 CFR 63, Subpart LLL). This would eliminate the daily operating requirement of the CEMS and will make the quarterly operating times (and the attendant reporting requirements) consistent with the two applicable Federal standards.

In Specific Condition 3(e), reference is made to "...specific condition 6.c(4), ...". As we discussed, this reference refers to an earlier draft of the air construction permit and is longer applicable. This typographical error needs to be corrected.

I appreciate the opportunity to provide you with these comments. If there are any questions, please feel free to contact me.

JBK/jhm

cc: Cary Cohrs, FRI
Fred Cohrs, FRI