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July 23, 2004

Via Email and USPS

RECEIVED

JUL 26 2004

BUREAU OF AIR REGULATION

Mr. Al Linero
FDEP
Twin Towers Office Bldg
2600 Blair Stone Road, MS 5500
Tallahassee, FL 32399-2400

Subject:: Florida Rock Industries, Inc.
Thompson S. Baker Cement Plant – Newberry, Florida
Facility ID No. 0010087
Short-term Tests to Evaluate SNCR

Dear Al: *0010087-011-AC*

This letter will confirm the request made to you by Florida Rock Industries, Inc. (FRI) during the meeting in your office on July 1, 2004, to conduct tests at the FRI Thompson S. Baker Cement Plant in Newberry, Florida to evaluate selective non-catalytic reduction (SNCR) for reducing nitrogen oxides (NOx) emissions from the Thompson S. Baker Portland Cement Plant. Currently, the plant is operating under Permit 0010087-009-AV. This permit limits the preheater feed rate to 183 tons per hour (191.4 tph peak rate) and limits the clinker production to 110.2 tons per hour (115.0 tph peak rate). The permitted heat input rate to the plant is limited to 364 mmBTU per hour. The thermal energy can be supplied by coal, TDF, propane, and No. 2 fuel oil. None of these limits will be exceeded during the SNCR tests.

By this letter, I am requesting, on behalf of FRI, Department approval to conduct the SNCR tests for a 60 operating day period beginning with approval of this request. During the test period, ammonia-based compound(s) will be introduced near the precalciner, above the point where tertiary air is introduced. The point or points of introduction will be at locations that have both sufficient oxygen and an adequate temperature for SNCR to be effective. It is

anticipated that ammonia water will be the form of ammonia used, although, FRI requests the option to use other ammonia compounds if feasible or necessary. One or more injection locations will be evaluated, as well as the injection rate of ammonia.

During the test period, continuous emission monitoring systems (CEMS) at the plant will continuously monitor the emissions of NO_x, SO₂, THC, and opacity. The SNCR tests are not expected to have any effect on particulate matter emissions or the emission rate of any other regulated compound, with the possible exception of carbon monoxide. It is requested therefore, that no emission testing other than for carbon monoxide (CO) be required during the test period. All CEM data will be available for Department review as will be the CO monitoring data. Also, visible emission observations will be conducted on the kiln stack to determine if the ammonia injection at various rates results in a detached plume.

It should be noted that no physical construction to the kiln system will be required for the requested testing.

We would appreciate your expeditious review of this request so that FRI can proceed with the testing at the earliest possible date.

Very truly yours,


KOOGLER & ASSOCIATES


John B. Koogler, Ph.D., P.E.

JBK/llt

cc: Gary Sauer, FRI Jacksonville
Chris Horner, FRI Newberry
Henry Gotsch, FRI Newberry
Segundo Fernandez

