



KOUGLER & ASSOCIATES  
ENVIRONMENTAL SERVICES

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

Mr. Jim Pennington  
Florida Department of  
Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

KA 187-04-10  
May 13, 2005

RECEIVED

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BUREAU OF AIR REGULATION

**RE: Florida Rock Industries  
Air Permit 0010087-013-AC; PSD-FL-350  
Comments on Draft Air Construction Permit**

Dear Jim:

This letter provides a written record of comments on the above captioned draft air construction permit relayed to you verbally shortly after the Intent to Issue was received by Florida Rock Industries (FRI). I will provide general comments on the **INTENT TO ISSUE AN AIR CONSTRUCTION PERMIT** and on **THE PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT**. More specific comments will be provided on the draft permit itself. No specific comments are provided on the **BEST AVAILABLE CONTROL TECHNOLOGY DETERMINATION** although some of the comments on the Intents to Issue and the draft permit apply.

Regarding the two Intents to Issue, the comments relate primarily to a description of the facility. It should be recognized by the Department that the "coal handling and grinding operation" applies to both coal and petroleum coke and that the receipt of raw materials at the site, and shipping of product from the site, will be both by truck and rail. For clarification, it should also be noted that the clinker will be ground and combined with gypsum and other raw materials to produce Portland cement, masonry cement, and perhaps some specialty products.

One final comment on **THE PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT** applies to the last sentence of the second paragraph. The sentence should state “the proposed project will result in...” rather than “the proposed testing and evaluation will result in...”.

The comments on the permit will reference the page number and section to which the comments apply. Some of the comments duplicate, to some extent, those already made.

**Page 2, Facility Description, Paragraph 1**

The PM emission limit should be corrected to 28.8 pounds per hour and the PM10 limit should be corrected to 25.0 pounds per hour. See further comments related to Page 19, Specific Condition 14.

As stated previously, clinker is milled and combined with other raw materials including, but not limited to, gypsum, limestone and slag to produce Portland cement, masonry cement, and perhaps other specialty products.

Again, it should be noted that raw materials will be brought to the site and product will be shipped from the site by both truck and rail.

**Page 2, Facility Description, Paragraph 2**

The raw material handling and storage rates should be 510 tons per hour, annual average.

**Page 3, Regulatory Classification, Paragraph 3**

It should be stated that the facility is a presumed major source of hazardous air pollutants (HAPs), because the plant is a presumed major source of hydrochloric acid. The facility is presumed to be a major source of HCl, but testing has not verified this.

Conversely, testing for HCl on similar cement plants has indicated that Portland cement plants may not be a major source of HCl.

It should also be noted that there is no MACT requirement to test for HCl. This statement should be removed from the permit.

**Page 4, Relative Documents, Third Bullet Item**

The additional information was received from FRI on January 14, 2005.

**Page 7, Section II, Condition 13(c)**

It is requested that the reference to the use of water sprays be changed to read:

*Water sprays shall be used to wet the materials and fuel if inherent moisture and moisture from wetting the storage piles are not sufficient to prevent unconfined particulate matter emissions.*

The requirement to install permanent spray bars at each conveyor is overly prescriptive and unnecessary. If spray bars or another type of permanent water spray system is found to be necessary on a particular conveyor, it will be installed. It is highly unlikely however, that such sprays will be necessary on all conveyors.

**Page 9, Section II, Condition 23(a)**

It should be clarified that the observation time for visible emissions is to be 60 minutes for the initial compliance tests and 60 minutes thereafter for each emission point with an emission rate of 100 tons per year or more. For minor emission points (less than 100 tons per year), the observation period, following the initial compliance test, is 30 minutes.

**Page 11, Section II, Condition 33**

The requirement for the plant manager to have at least ten years of cement industry experience and also experience as a cement plant manager is overly prescriptive and should not apply to FRI. FRI recognizes the necessity to have well trained and experienced managers, supervisors and operators at the plant and assures the Department it will do so. But, to specify the length of service that qualifies one for “experienced” is overly prescriptive and unnecessary. Therefore, we specifically request deletion of this requirement.

**Page 12, Section III, Subsection A**

The conditions in the facility’s existing Title V permit that will be superseded by conditions referenced in this Subsection are those related to raw material handling and storage.

**Page 12, Section III, Condition 2**

The 510 ton per hour processing rate is an annual average rate.

**Page 16, Section III, Emission Unit Description**

The rule referenced in the last line of paragraph 1 should be to Rule 62-296.407, F.A.C. and not to 62-296.701. Rule 62-296.701 applies to plants subject to the RACT rule.

**Page 16, Section III, Condition 2**

It is requested that FRI have the option of using whole tire derived fuel to provide up to 30 percent of the total pyroprocessing heat input, not to exceed 120 mmBTU per hour. This condition would be consistent with the condition in the Kiln No. 1 permit.

With Kiln No. 1, FRI currently uses whole tire derived fuel to provide 7-10 percent of the total pyroprocessing system heat input. With Kiln No. 2, however, the use

of SNCR to control NO<sub>x</sub> emissions will give FRI the option of operating the kiln with oxidizing conditions at the back end of the kiln (the end of the kiln where the gases exit and the end of the kiln into which whole tire derived fuel will be introduced). The oxidizing condition will likely allow FRI to use more whole tire derived fuel than is presently used in Kiln No. 1; and perhaps more than 15 percent of the total heat input. For this reason, FRI requests an upper limit on the heat input provided by whole tire derived fuel of 30 percent.

It should be noted that FRI will be required to demonstrate compliance under "worst case" operating conditions. Thus, at whatever processing rate and fuel use rate FRI demonstrates compliance, Department rules restrict future operation to that rate plus 10 percent as long as maximum permitted rates are not exceeded. Because of this rule requirement, FRI will be limited to use no more than 110 percent of the whole tire derived fuel firing rate used during compliance testing, until such time testing is conducted at a higher whole tire derived fuel firing rate; not to exceed 30 percent of the total heat input.

Also in Paragraph 2(a), it is requested that the remaining heat input to the pyroprocessing system (beyond that supplied by whole tire derived fuel) include heat input from natural gas and distillate fuel oil. Both of these fuels are authorized by this condition.

FRI also requests that Paragraph 2(b) be removed from the permit. With limits on the heat input (mmBTU/hr), it is unnecessary to further limit fuels (by mass or volume). This is particularly true for coal and petroleum coke as the heating values of these two fuels could change significantly. If mass or volume limits are determined to be necessary in the permit, it should be stated that these are typical mass or volume limits based on specific fuel heating values.

**Page 17, Section III, Condition 4**

As requested and discussed, the kiln feed rate and the clinker production rate should both be 24-hour average rates. The cement production rate should be a 30-day average rate and it should be specified that the types of cement are Portland cement, masonry cement, and perhaps other specialty products.

**Page 17, Section III, Condition 5**

As with the heat input rate to the pyroprocessing system, the heat input to the air heater is sufficiently limited by specifying a maximum heat input rate of 40 mmBTU per hour. It is unnecessary to also limit the volumetric firing rates of natural gas and distillate oil.

**Page 18, Section III, Condition 11**

It is requested that Condition 11 be changed to read:

*Performance Testing: The owner or operator shall notify the Department at least 60 days prior to initiating a change in feed or fuel that may adversely affect compliance with D/F or PM emission limiting standards, or as soon as practical where 60 days advance notice is not feasible. For purposes of this condition, such change may include a physical or chemical change in feed or fuel or a change in the LOI of the flyash.*

This language is consistent with the language of 40 CFR 60.3.1349(e)(3)(i). Also, a change in a "supplier of feed or fuel" is eliminated as a supplier can be changed without affecting the physical or chemical characteristics of feed or fuel, or adversely affecting compliance with D/F or PM limiting standards.

**Page 18, Section III, Condition 12**

It is requested that this condition either be eliminated (the preferred action) or changed to read:

*SO<sub>2</sub> Control: The owner or operator shall use hydrated lime injection or other equally effective means to control SO<sub>2</sub> emissions when necessary.*

The specification of the hydrated lime injection system is overly prescriptive and does not allow FRI the option of using equally effective and possibly less costly methods of controlling SO<sub>2</sub> emissions; such as the elimination of higher sulfur fuels or raw materials.

**Page 19, Section III, Condition 13**

In the second paragraph, it should be specified that the initial compliance tests for PM and PM10 are waived. By specifying that PM10 compliance testing is also waived, there will be no ambiguity in test requirements at a future date.

**Page 19, Section III, Condition 14**

In the table listing emission limits, the emission limit for PM should be 0.136 pounds per ton of dry preheater feed (column 2) and 28.8 pounds per hour (column 3) and the emission limit for PM10 should be 0.118 pounds per ton of dry preheater feed (column 2) and 25.0 pounds per hour (column 3). In both cases, the emission limits expressed as pounds per ton of clinker are correct. The corrected emission limits expressed as pounds per ton of dry preheater feed are calculated by multiplying the emission rates expressed as pounds per ton of clinker by the ratio of permitted clinker production to preheater feed; or 125/212.

**Page 20, Section III, Condition 15**

This condition should state that the emission rate of particulate matter is not to exceed 0.30 pounds per ton of kiln feed and the rule reference should be 62-

296.407(2)(a), F.A.C. Rule 62-296.710, F.A.C. applies to cement plants subject to the RACT rule.

**Page 21, Section III, Condition 16**

In the note at the end of this condition, the annual PM and PM10 emission limits should be 60.0 and 47.5 tons per year, respectively. These corrected annual rates are consistent with the hourly rates in the table preceding this note and an annual operating time of 8760 hours per year.

**Page 21, Section III, Condition 17**

This condition should state that particulate matter emissions shall not exceed 0.10 pounds per ton of kiln feed and the rule reference should be 62-296.407(2)(b), F.A.C. as noted in the comment on Condition 15.

**Page 21, Section III, Condition 18**

In the second paragraph it should state that subsequent compliance testing for PM and PM10 are waived. Again, this waiver will assure there is no ambiguity in test requirements at a future date.

**Page 22, Section III, Condition 19**

In paragraph 3, it should again be stated that the initial compliance testing for PM and PM10 emissions from these emission points are waived. As stated previously, this is to prevent any ambiguity regarding test requirements in the future.

**Page 22-23, Section III, Condition 20**

As discussed with the Department, FRI will not object to the installation of a CO CEMS in the kiln/raw mill stack, but requests that the monitored CO data be used only to provide reasonable assurance of compliance with the permitted CO emission limiting standard. The reason for this is that the CO concentration in the kiln/raw mill stack gas is



known to fluctuate and there is no long-term CO monitoring data available for any cement plant in the state.

Most importantly, it should also be noted by the Department that the BACT established CO emission limit is based on data from other plants collected during 3-hour compliance tests using EPA Method 10. To take an emission limit based on a 3-hour average time and require that compliance be demonstrated by continuous monitoring is unwarranted and could very likely create severe hardships on FRI and other plant operators faced with the same requirement.

It is requested that compliance with the permitted CO emission limiting standard demonstrated by an annual compliance test conducted in accordance with EPA Method 10 and that the CO CEMS be used to provide the Department with reasonable assurance for the issuance of this permit.

At a point in time following plant start up, when an adequate record of continuous CO monitoring data is available, FRI is willing to discuss the use of the CO CEMS for compliance. Such a permit condition is analogous to the higher permitted NO<sub>x</sub> emission limit allowed during the initial stages of plant operation.

It is also requested that the use of the CO CEMS for compliance assurance or for future compliance, if deemed feasible, be based on a 30-day averaging time. The 30-day averaging time is requested because of the variability observed in limited CO monitoring data from various cement plants in Florida.

An additional comment related to Condition 20 is that the VOC emission limit is not a 3-hour average limit. The sentence in this condition addressing the VOC averaging time should read:

*Compliance with the ~~3-hour~~ emission limit for VOC  
shall be based on a 30-day block average...*

Regarding the averaging time for the CO emission limit, as addressed above, it is requested that initial compliance be demonstrated with a compliance test conducted in accordance with EPA Method 10. During this period of time, the averaging time for the CO emission limit can reasonably be expected to be 3-hours; the length of time necessary to conduct the compliance test. If FRI and the Department decide at a future date to use the CO CEMS for compliance, the averaging time for CO must be a 30-day average.

At the end of Condition 20, there are two references to the kiln/raw mill baghouse. The particulate matter emissions from the kiln/raw mill are controlled by electrostatic precipitator. Also in this section of the condition, it is suggested that the rule reference should be corrected to 40 CFR 63.1350 at two locations. A second rule reference to 40 CFR 63.1349 appears to be correct.

**Page 23, Section III, Condition 22**

It is suggested that Condition 22 be eliminated as the PM/PM10 emission testing addressed by this condition is already addressed by Conditions 13, 18, and 19.

**Page 23, Section III, Condition 23**

This condition should read:

*Visible Emission Tests Required/Emission Units 009, 012, and 013: The owner or operator shall, for Emission Units 009, 012 and 013 demonstrate compliance with the visible emission limits of Specific Conditions ~~29(e) and 39~~ 13, 18 and 19 of this subsection annually...*

**Page 24, Section III, Condition 25**

This condition requires emission tests for PM/PM10, SO<sub>2</sub>, NO<sub>x</sub>, VE, CO, and VOC during initial operation under six different fuel firing scenarios. As discussed with the Department, it would be more reasonable to conduct these emission measurements under the “worst case” fuel firing scenario. This “worse case” fuel firing scenario would most likely be the scenario when a mixture of coal and petroleum coke was used as the primary fuel, with whole tire derived fuel being used as a supplementary fuel and with high carbon flyash being fed directly into the calciner.

It should be noted by the Department that FRI has recently conducted compliance tests for D/F and collected SO<sub>2</sub>, NO<sub>x</sub>, VOC and opacity monitoring data while firing this “worst case” combination of fuels. The emission measurements and monitoring were conducted during tests authorized by the Department and demonstrate compliance with all permitted emission limiting standards for Kiln No. 1. The test report is presently being prepared.

It is suggested that this condition be worded:

*Emission tests of Emission Unit 010 shall be conducted for the pollutants in Condition 24 under the fuel firing scenario representing the highest potential for generating emissions. Changes in operating conditions that may affect the emissions of any pollutant specified in Condition 24 shall be noticed to the Department 60 days prior to such change, or as soon as practical where 60 days advance notice is not feasible.*

**Page 50, Section III, Subsection C, Condition 2**

It should be specified that the coal/petroleum coke mill rate of 15.4 tons per hour is a 30-day average rate.

**Page 50, Section III, Subsection C, Condition 4**

The parenthetical requirement at the end of Paragraph 1 should state:

*...(observations for the initial compliance test shall be  
made for three hours...)*

\* \* \* \* \*

We appreciate your review and consideration of these comments. If there are questions regarding the comments or if further rationale for the comments is required, please do not hesitate to contact me at 352-377-5822 or by email at [jkoogler@kooglerassociates.com](mailto:jkoogler@kooglerassociates.com). I am also attaching comments on the report prepared by Schreiber (dated March 22, 2005) commenting on the FRI permit application, for your review, as we've discussed.

Very truly yours,

KOOGLER & ASSOCIATES, INC.

  
SEAL

Steven C. Cullen, P.E.  
For John B. Koogler, Ph.D., P.E.

JBK/lt

cc: Ms. Trina Vielhauer, FDEP  
Mr. Jeff Koerner, FDEP  
Mr. Bobby Bull, FDEP  
Mr. Gary Sauer, FRI  
Mr. Chris Horner, FRI  
Mr. Henry Gotsch, FRI  
Mr. Segundo Fernandez, Oertel, Fernandez and Cole  
Mr. Tim Atkinson, Oertel, Fernandez and Cole  
Mr. Steve Cullen, KAI



**COMMENTS ON SCHREIBER REPORT**  
**Prepared by Koogler & Associates, Inc.**

The city of Newberry authorized Robert J. Schreiber of Schreiber, Yonley and Associates Environmental Engineers to conduct an independent review of the air permit application prepared by FRI for Kiln No. 2. The kiln is to be located at the Thompson S. Baker Cement Plant site. Schreiber's firm is located in Fenton, Missouri; telephone 636-349-8399. The report by Schreiber was submitted to Mr. Scott Walker, City Attorney for the City of Newberry and was dated March 22, 2005.

The purpose of this paper is to provide comments on the Schreiber report. The comments follow the text of the report. The comments reference the report page number and paragraph number to which the comment applies.

**Page 1, Paragraph 3**

Comments are made regarding the fact that the application did not include emission estimates for sulfuric acid mist, fluorides and lead. FDEP has found, based on emission measurements from at least five of the existing cement plants in Florida, that sulfuric acid mist, fluorides and lead are not emitted in significant quantities from cement plants. In other words, the emission rates of these three compounds have been determined by FDEP not to be an environmental or health concern. As a result, FDEP has elected not to regulate the emissions of these three compounds and does not require an estimate of the emission rates of the compounds in the permit application.

**Page 1, Paragraph 4**

The permitting regulations applicable to Kiln No. 2 specify that a mercury emission rate of less than 200 pounds per year is not significant; i.e., the impact of the emissions will not have a significant impact on either the environment or human health. FRI had proposed a mercury emission limit of 175 pounds per hour. In the review of the

application however, FDEP determined that best available control technology would result in a mercury emission rate of no more than 122 pounds per year. FRI agreed to this lower mercury emission rate as a permit limit.

Regarding the demonstration of compliance with this emission limit, FDEP has determined that the most reliable means of monitoring is to monitor all of the mercury in raw materials and fuels entering the plant, with the assumption that all of the mercury entering the plant is discharged into the atmosphere. This is how FRI currently monitors mercury emissions from Kiln No. 1. So, if less than 122 pounds of mercury enter the new plant in a year, certainly no more than 122 pounds per year can be discharged.

The monitoring of mercury in raw materials and fuels is a much more reliable means of demonstrating compliance with the mercury emission limit than a one-time stack test. The kiln system removal efficiency referenced by Schreiber is not significant and is therefore not restrictive on FRI. The small degree of conservatism introduced by ignoring the removal efficiency for mercury only adds to the assurance that mercury emissions will not exceed 122 pounds per year.

**Page 2, Paragraph 2**

Fugitive particulate matter emissions from the quarrying activities were considered. The limestone that is quarried by FRI is from below the water table and the inherent moisture in the limestone keeps the fugitive particulate matter emissions from this activity at an insignificant level. FDEP concurs with this assessment.

**Page 2, Paragraph 3**

The particulate matter emission limits for all baghouses associated with Kiln No. 2 are now consistent. Particulate matter (PM) emissions are limited to 0.01 grains per dry standard cubic foot, and the emission of particles less than 10 micrometers in diameter (PM<sub>10</sub>) is limited to 0.007 grains per dry standard foot.

**Page 2, Paragraph 4**

The question regarding the efficacy of Teflon® membrane coated fabric filter media for the baghouses was also raised by FDEP. FRI responded to FDEP's request for information by letter dated January 14, 2005. This document was reviewed by Schreiber in preparing his report; the information provided to FDEP was apparently overlooked.

In gathering information for FDEP, GE/BHA (the Bag House of America Division of GE) was contacted. This company has been in the forefront of fabric filter development and application for decades.

The GE/BHA stated that typical guarantees for membrane coated fabric filter media are no better than 0.01 grains per dry standard cubic foot. This is the particulate matter limit that FRI has already agreed to in the air construction permit. Thus, there is nothing to be gained by converting to the membrane coated filtering material.

Schreiber also comments that the particulate matter emission limits for the kiln/raw and clinker cooler should be listed in units of grains per dry standard cubic foot as well as the currently reported units of pounds of particulate matter per ton of clinker. This is not a relevant issue as FDEP has determined the emission rates for the kiln/raw mill and clinker cooler (expressed as pounds of particulate matter per ton of clinker) to be Best Available Control Technology (BACT). It should also be noted that the particulate matter emission limits in the FRI permit for the kiln/raw mill and clinker cooler are among the lowest in the U.S.

As a side note, the particulate matter emission limits (expressed as PM<sub>10</sub>) for the Holcim Cement Lee Island Project in Missouri, a plant permitted by Schreiber in 2004, are as follows:



- Kiln/Raw Mill - 0.28 pounds per ton of clinker. This compares with a permit limit for the FRI Kiln No. 2 of 0.12 pounds per ton of clinker
- Clinker Cooler - 0.07 pounds per ton of clinker compared with a limit for FRI Kiln No. 2 of 0.05 pounds per ton of clinker.

**Page 3, Paragraph 1**

The work practices that FRI will employ to control fugitive particulate matter emissions have been determined by FDEP to be BACT, due to the minor nature of fugitive emissions, the large surrounding tract of land, mining below the water table and other factors. It should be noted that FDEP is authorized by USEPA to make this determination; however, USEPA does have oversight authority. No comments have been received by FDEP from EPA critical of the work practices proposed by FRI.

The work practices that FRI is proposing includes maintaining adequate moisture in materials that must be handled by loader, the storage of materials in covered storage areas or in silos, a maintenance program to clean up any material that might spill and the use of a vacuum sweeper to sweep roadways in the plant site.

**Page 3, Paragraph 2**

As stated previously, FDEP has been authorized by USEPA to review permit applications and issue permits, with USEPA oversight review authority on all permit related matters. The impairment analysis related to visibility, soils and vegetation has satisfied FDEP and no comments have been received to the contrary by USEPA.

It should also be noted that the Air Quality Standards (NAAQS and PSD, as referenced by Schreiber) were established by EPA to assure, with a reasonable margin of safety, that both the environment and human health are protected. Thus, compliance with these standards assures visibility, soil and vegetation are protected.

**Page 3, Paragraph 3 through Page 4, Paragraph 3**

The comments made by Schreiber related to the control of sulfur dioxide (SO<sub>2</sub>) have been considered by FRI in the preparation of the air construction permit application. The analyses suggested by Schreiber and the SO<sub>2</sub> control alternatives proposed are not relevant in the case of FRI or, for that matter, any other cement plant in the State of Florida.

FDEP has concluded, and rightly so, that any SO<sub>2</sub> emissions from cement plants are the result of sulfur in the feed materials; not sulfur in the fuel. The reason for this is the alkaline nature of the feed material (predominantly limestone). Any SO<sub>2</sub> generated from fuel combustion is absorbed as the combustion gases pass through the alkaline raw materials in the preheater.

The SO<sub>2</sub> that is emitted is present in the raw materials and is given off as temperatures of the raw materials increase during passage through the upper stages of the preheater. Fortunately, for cement plant operators in Florida, the raw materials quarried in the state and the imported raw materials used to produce cement are extremely low in sulfur bearing compounds. As a result, long-term records from all the cement plants in Florida have demonstrated that SO<sub>2</sub> emissions are most always less than five pounds per hour. Because of this, the analyses suggested by Schreiber and the control alternatives suggested by Schreiber are not necessary.

As a side note, it should be noted that the Holcim Plant in Missouri permitted by Schreiber has an SO<sub>2</sub> emission limit of 694 pounds per hour; compared with an expected SO<sub>2</sub> emission rate from the FRI Kiln No. 2 of approximately five pounds per hour. The expected SO<sub>2</sub> emissions from the FRI plant are well over 100 times less than from the plant permitted by Schreiber. It appears that the comments in Schreiber's report to the City of Newberry related to SO<sub>2</sub> emissions and SO<sub>2</sub> control are based on his recent experience with the Holcim Plant; not on conditions that exist in Florida.

**Page 4, Paragraph 4**

The cost analysis for determining the cost effectiveness of control options referenced by Schreiber is related to the control of SO<sub>2</sub>. As discussed in the previous section, the actual SO<sub>2</sub> emissions from the proposed FRI Kiln No. 2, and from other cement plants in Florida, are typically five pounds per hour or less. The cost analysis of any control option to further reduce these SO<sub>2</sub> emissions will result in a cost effectiveness that demonstrates control is not feasible. The cost analysis presented by FRI has been reviewed and accepted by FDEP and no comments to the contrary have been received from USEPA.

Again, it appears that Schreiber's comments related to SO<sub>2</sub> control are based on recent experience with the Holcim Plant in Missouri, not on conditions that exist in Florida.

**Page 4, Paragraph 5**

As stated by Schreiber, there are two cement plants in the US that have installed control systems for CO and VOC. One plant is located in Texas and the other in Michigan. The plant in Texas installed a control system that is literally the size of a football field. The system was installed to expedite the permitting process. It has been reported by several sources that the control system has not operated satisfactorily since its installation.

The control system installed in Michigan was installed primarily to abate odors and secondarily to control VOC and CO emissions. The odors result from an organic material present in raw materials used for the production of cement at this plant. Again, the cement plant operators in Florida are fortunate in that there is very little organic material in the raw materials quarried in the state.

It again appears that Schreiber is basing his comments on experience with the Holcim Plant in Missouri. The CO emission limit for that plant is 3307 pounds per hour and the VOC emission limit is 182 pounds per hour. In comparison, the CO emission limit for the proposed FRI Kiln No. 2 is 450 pounds per hour and the VOC emission limit is 15

pounds per hour. In a situation such as existed in Missouri, it would be feasible to look at additional CO and VOC emission control, but this is not the case in Florida. It should also be noted that no CO or VOC control equipment was installed at the Holcim, Missouri Plant.

\* \* \* \*

This concludes the comments on the report prepared by Schreiber, Yonley and Associates. If there are questions or comments, they should be addressed to Mr. Gary Sauer, President of the FRI Cement Group at 904-355-1781 extension 307 or by email at [gsauer@flarock.com](mailto:gsauer@flarock.com) or to Dr. John Koogler with Koogler and Associates at 352-377-5822 or by email at [jkoogler@kooglerassociates.com](mailto:jkoogler@kooglerassociates.com).