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SEP 11 2000

BUREAU OF AIR REGULATION

To: Al Linero
From: Mort Benjamin
Date: September 7, 2000
Subj.: Acid Mist and Beryllium Tests from Florida Rock Cement Plant

I am sending you a copy of the test report from Florida Rock in Newberry. The results from the sulfuric acid mist and beryllium are guides to permit limits.

The tests are reported as pounds emitted per hour. The kiln feed rate is reported as well. I have calculated the emission rates to pounds of pollutant per ton of clinker:

$\text{Feed Rate Actual} / \text{Feed Rate permit} \times \text{Clinker Rate permit} = \text{tons/hr clinker}$

$\text{Pounds emitted per hour} / \text{tons per hour clinker} = \text{pounds/ton clinker}$

Sulfuric Acid Mist

Feed Rate Tons/hr	Ratio	Clinker Rate Tons/hr	Emissions lbs/hr	lbs/ton
139.8	$139.8/149.9$ $\times 95.8$	89.34	0.0003	$3.36 \text{ e-}6$

Beryllium

138.3	$138.3/149.9$ $\times 95.8$	88.38	0.06	$6.79 \text{ e-}4$
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July 25, 2000

RECEIVED

JUL 26 2000

Mr. Al Linero,
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

**Re: DEP File No. AC01-267311
PSD-FL-228 – Facility Id. No. 0010087
Cement Plant – Newberry, Alachua County, Florida**

Dear Mr. Linero,

Following is the response to your letter to John Baker dated July 18, 2000.

REQUEST FOR INFORMATION No. 1

List the remaining tasks to be performed to complete installation and fine-tuning of plant equipment and the approximate dates for completing those tasks.

Response: Installation of all plant equipment is now complete with the possible exception of replacement CEM equipment as discussed in item 2 below.

The initial NO_x limit imposed by the permit is being met. Additional fine-tuning may be required to meet the lower NO_x limit to be met prior to the expiration of a 2-year period of operation.

With respect to the optional use of tire derived fuel, we are studying available and proven methods of feeding TDF to the pyro processing system. We will advise the Department of any decisions made in this regard and give notice of any performance testing to demonstrate compliance.

REQUEST FOR INFORMATION No. 2

Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.

Response: The plant first achieved and maintained production at the permitted capacity on or about May 18, 2000. Thus, no further work is required to demonstrate that the plant can operate at the permitted production rate.

The initial performance tests required by FDEP Permit AC 01-267311 were completed as of July 24, 2000, with the exception of visible emission observations of 13 minor emission points within the plant.

These include all of the emission measurements on the kiln and clinker cooler required by the referenced air construction permit and also all of the visible emissions observations on the kiln, the cooler, and five (5) minor material handling emission points throughout the plant. The remaining visible emission observations should be completed by July 31, 2000.

These tests have been conducted at the permitted levels of production, as required by specific condition No. 6 and within 90 – 100% of the maximum operating rate allowed by the permit, as required by Section 62-297.310 (2) FAC.

We plan to conduct additional testing to differentiate between total hydrocarbon emissions and volatile (non-methane) hydrocarbon emissions. These tests should be completed by August 31, 2000. The continuous emissions monitoring system (CEMs) for sulfur dioxide will be further evaluated. Adjustment and/or modifications may be required for these CEMs. It is anticipated that this matter can be completed by August 15, 2000. If the evaluation results in the need to purchase new CEM equipment, FRI will notify the Department with the anticipated delivery and installation dates.

REQUEST FOR INFORMATION No. 3

Provide a statement: (and basis for believing) that the facility will comply with applicable regulation.

Response: The facility will comply with all applicable regulations. The question was addressed in the Department's Final Order, dated December 12, 1996, in the case of HCA v. FRI and DEO, DOAH Case No. 95-5531, Florida Department of Environmental Regulation Case No. OGC95-2495. The project as contemplated to be completed under terms of Construction Permit No. AC01-267311, and all relevant operational parameters has not changed since issuance of the final order, which includes the determination that reasonable assurance had been provided that all applicable Department standards would be met.

Please call me at 800-874-8382, extension 307 if you feel your questions have not been sufficiently answered.

Best regards,



Fred W. Cohrs
Vice President

FWC/bc

Cc: John D. Baker III, FRI
Cary O. Cohrs, FRI
John Koogler, P.E., Koogler & Associates
Chris Kirts, DEP NED



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

July 18, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

Re: DEP File No. AC01-267311
PSD-FL-228 – Facility Id. No. 0010087
Cement Plant – Newberry, Alachua County, Florida

Dear Mr. Baker:

The Department reviewed your request dated July 17, 2000 to further extend the expiration date of the construction permit. Per Rule 62-4.080, F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

We already have fairly extensive information about the facility and the control equipment. We understand that compliance testing is underway. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

1. List the remaining tasks to be performed to complete installation and fine-tuning of plant equipment and the approximate dates for completing those tasks.
2. Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.
3. Provide a statement (and basis for believing) that the facility will comply with applicable regulation.

If you have any questions regarding this matter, please call me at 850/921-9523 or Teresa Heron at 850/921-9529.

Sincerely,

A. A. Linero, P.E. Administrator
New Source Review Section

Cc: Fred Cohrs, FRI
Cary Cohrs, FRI
John Koogler, P.E.
Chris Kirts, DEP NED

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- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr John D Baker
 President
 Florida Rock Industries Inc
 155 E 21 St
 Jacksonville FL 32206

2. Article Number (Copy from service label)
 Z 341 355 336

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

7/19/50

C. Signature Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: NO

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Z 341 355 336

US Postal Service

Receipt for Certified Mail

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Do not use for International Mail (See reverse)

Sent to <i>John D Baker, Pres</i>	
Street & Number <i>155 E 21 St</i>	
Post Office, State, & ZIP Code <i>Jax FL 32206</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date <i>Fl. Rock - 7/19/50 - no insent plant</i> <i>receiving</i>	

PS Form 3800, April 1995

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

301 SOUTH BRONOUGH STREET
SUITE 500
TALLAHASSEE, FLORIDA 32301

(850) 521-0700
FAX (850) 521-0720

MAILING ADDRESS:
POST OFFICE BOX 1110
TALLAHASSEE, FLORIDA 32302-1110

<http://www.ohfc.com>

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KENNETH G. OERTEL
PATRICIA A. RENOVTCH

RECEIVED

JUL 17 2000

July 17, 2000

BUREAU OF AIR REGULATION

Via Hand Delivery

Mr. Howard C. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Re: FDEP Air Construction Permit No. AC01-267311 / PSD-FL-288
Facility No.: 0010087

Dear Mr. Rhodes:

We represent Florida Rock Industries, Inc. with respect to its Thompson S. Baker Cement Plant in Newberry, Florida. We understand that the current permit extension will expire on July 30, 2000. We hereby request an extension of the above-referenced permit for a further six month (6-month) period. This extension is required in order to complete production testing and operational fine-tuning, complete physical construction and equipment installation, and to complete all air emissions testing required by the FDEP permit.

The construction permit required the company to apply for its Operation/Title V Permit by a time certain, prior to expiration of the construction permit. That permit application was submitted on October 1, 1999, and final processing is pending submittal of the air emissions testing. We anticipate that the extension being requested will allow for the final processing of the Title V Permit Application during the pendency of the construction permit extension.

Mr. Howard C. Rhodes, Director
Division of Air Resources Management
July 17, 2000
Page 2

We therefore request an extension of FDEP Permit No. AC01-267311/PSD-FL-228 for a further six month period from July 30, 2000 to January 31, 2001. We have enclosed the processing fee of \$50.00 pursuant to Rule 62-4.050(4)(r)3., Florida Administrative Code.

Please feel free to call us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Segundo J. Fernandez', with a stylized flourish at the end.

Segundo J. Fernandez
Timothy P. Atkinson

Enclosure

c: John Baker
Fred Cohrs
Cary Cohrs
John B. Koogler
Steve Cullen
Al Linero
Doug Beason
Chris Kirts
Larry Morgan