



Department of Environmental Protection

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Colleen M. Castille
Secretary

November 21, 2006

Electronically sent – Received Receipt requested.

Mr. Chris Horner: chrish@flarock.com
Plant Manager
Florida Rock Industries, Inc.
4000 NW CR 235
Newberry, Florida 32669

Re: Request for Additional Information
DEP File No. 0010087-025-AC
Kiln 1 Heat Input Increase/SO₂ Averaging Time

Dear Mr. Horner:

On October 25, 2006 the Department received Florida Rock Industries' (FRI) application for an air construction permit modification to allow a heat input increase, and to change the averaging time of the SO₂ continuous emissions limit. The Department requests the additional information below regarding these issues.

Pursuant to Rules 62-4.055, and 62-4.070 F.A.C., Permit Processing, the Department requests submittal of the additional information prior to processing the application. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

Heat Input Increase

Included in your report in support of the application was the identification of an event in 2002 during which FRI limited production in order to stay within the permitted heat input limit for the kiln. Please identify a few more examples of other periods during which heat input was the limiting factor in production. Describe the quantity and duration of these events. What percentage of actual operating time during any calendar year do these events represent? Are the emissions of continuously monitored pollutants notably higher during these periods? Please submit summaries of any available heat input, production, and emissions data from these events. How do the emissions compare to operation during other periods of "normal" operation when the specific heat of production is between 2.6 and 3.0?

If the heat input limit had been the requested 408 mmBtu/hour during these events, what would the production rate have been in lb/hr of clinker for each hour? Quantify any additional emissions that would have occurred during each calendar year had the heat input been limited to the higher requested number.

SO₂ Averaging Time

Has FRI considered any other averaging time scenarios? Please identify other options. According to the application there was only one event during the period between January 2005 and January 2006 in which the 24-hr SO₂ average approached the 0.16 lb/ton of clinker limit. What was the 24-hr average during that event? Does FRI foresee the occurrence of these events becoming more frequent in the future? Have there been unplanned operational changes that have taken place when SO₂ emissions approached the 24-hr limit?

Please provide the SO₂ emissions data on CD in Excel format from the CEMS for the most recent two year period. Include the columns for production or feed rate, lb/hr, lb/ton clinker, 24-hour average, mill on/off status, and heat input.

Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call Cindy Mulkey at 850/921-8968.

Sincerely,



A.A. Linero, Program Administrator
Bureau of Air Regulation
South Permitting Section

AAL/cm

cc: Henry Gotsch, FRI: HGotsch@flarock.com
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