

**FLORIDA ROCK INDUSTRIES INC**

Mining, Ready Mix Concrete, and Construction Products

Becky  
Clair } FYF  
Duffy }

From: Howard  
10/10

October 3, 2001

RECEIVED



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OCT 05 2001

DIVISION OF AIR  
RESOURCES MANAGEMENT

Mr. Howard Rhodes, Director  
Division of Air Resources Management  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road, MS 5500  
Tallahassee, Florida 32399-2400

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OCT 10 2001

BUREAU OF AIR REGULATION

**Subject: Florida Rock Industries, Inc.  
Thomas S. Baker Cement Plant  
Proposed Title V Permit  
No. 0010087-002-AV**

Dear Howard:

I am writing to express my concern regarding the attached letter from Chris Bird, Director of the Alachua County Environmental Protection Department to Mr. Winston Smith of EPA, Region 4, Atlanta, regarding the proposed Title V Permit for the Florida Rock Industries Thomas S. Baker Portland Cement Plant located in Newberry, Florida. As you know, Alachua County filed for an administrative hearing challenging our Title V Permit but withdrew their challenge after certain assurances were incorporated into the permit. In spite of withdrawing their challenge at the state level, Alachua County has seen fit to express "...its specific concerns in hopes that they will be addressed [at EPA's insistence] in the final version of the Title V Permit."

I've discussed the attached letter with Mr. Greg Worley of Winston Smith's office and was informed that the only meritorious concern expressed by Alachua County, and indirectly at that, is related to the air construction permit condition that the gases exiting the kiln be maintained at a minimum temperature of 1400°F for at least one hour before tire derived fuel firing commences. Evidently, this condition was inadvertently left out of the Draft Title V Permit. Worley stated that he will suggest that this permit condition be included in the Title V Permit as it was an air construction permit condition. Certainly, Florida Rock has no objection to this. Worley stated that the other concerns addressed by Alachua County were totally without rule basis.

The concern I would like to express to you as an operator of a permitted air emission facility in Alachua County, is that a county with such a lack of understanding of

Mr. Howard Rhodes  
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Title V Permit requirements and/or with such an overzealous attempt to impose permit conditions which have no rule basis in a Title V Permit is asking your Department for authority to establish a state approved air program in the county. I trust you'll take matters such as this into consideration when evaluating the merits of Alachua County's request.

If you have any comments regarding this matter, please feel free to contact me.

Very truly yours,

FLORIDA ROCK INDUSTRIES, INC.



Fred W. Cohrs  
Vice President

FWC/jm  
attachment



Board of County Commissioners

# ALACHUA COUNTY ENVIRONMENTAL PROTECTION DEPARTMENT

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September 18, 2001

Mr. Winston Smith, Director  
Air, Pesticides & Toxics Management Division  
U.S. Environmental Protection Agency Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-3104

Re: Florida Rock Industries, Inc., Thompson S. Baker Cement Plant  
Proposed Title V Permit No. 0010087-002-AV

Dear Mr Smith:

The purpose of this letter is to provide Alachua County's comments regarding the Proposed Florida Department of Environmental Protection (FDEP) Title V permit for the Florida Rock Cement Plant in Newberry, FL. Alachua County Environmental Protection Department (ACEPD) wishes to express its specific concerns in hopes that they will be addressed in the final version of the Title V permit.

1) The Proposed Title V permit limits input of mercury compounds (as Hg) in all raw materials and fuel kiln system to 200 pounds per year. The County's position is that such limit is arbitrary and excessive, particularly in consideration of atmospheric deposition and existing mercury contamination in our waterways. These and other concerns were addressed in the enclosed letter from the Chair of the Alachua County Board of County Commissioners to State Senator Rod Smith. Alachua County requests that a condition be added to the Title V permit to require the use of coal with low-mercury content and to limit mercury emissions to a reduced level.

2) Based on past actions, Florida Rock has demonstrated that it cannot effectively control the quality of raw materials and fuels. Alachua County requests testing of mill scale and fly ash on regular basis to assure non-contamination, and thereby preventing excess VOC and metals emission.

3) The Proposed Title V permit states that 30-day rolling average Total Hydrocarbon (THC) emission rates reported by Continuous Emission Monitoring (CEM) systems shall be reported to the FDEP no later than the 15<sup>th</sup> day following each calendar quarter.

Alachua County requests that the CEM systems data for SO<sub>2</sub>, NO<sub>x</sub>, THC, the continuous opacity monitor (COM) data for opacity, the flow monitor data for volumetric flow, the process monitor for O<sub>2</sub> data and the clinker production data should be reported real-time to the FDEP and the ACEPD. Further, the hourly and the 30 day averages reported quarterly should not be limited to only THC emissions but should also include

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STATE OF FLORIDA  
DEP - REGIONAL DISTRICT  
JACKSONVILLE

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the preheater feed rate, and the clinker production rates. ACEPD is concerned that these process parameters should also be included in the report.

Further, all times of the quarter shall be reported including times when the kiln is fed with only fuel (coal, whole tires, No.2 unused fuel oil, propane). ACEPD is concerned that there will be certain times when clinker production is not being produced yet some fuel is processed in the kiln and which may go unreported.

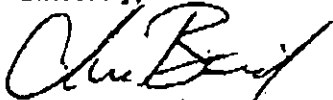
4) The Proposed Title V permit states that manual stack tests for particulate, carbon monoxide, VOC, beryllium and sulfuric acid mist should be performed while firing both fuels (70% to 100% coal and 0 to 30% tires) and while the continuous monitoring systems are functioning properly. Alachua County requests that CEM systems data for SO<sub>2</sub>, NO<sub>x</sub>, THC and COM data for opacity, the flow monitor data for volumetric flow, the process monitor for O<sub>2</sub> and the clinker production rates data should be reported for the same time period. ACEPD is concerned that certain parameters during the manual stack testing could be altered to achieve the desired test compliance for the manual test and which could change the emissions monitored by CEM systems.

5) The Proposed Title V permit does not address fine particulate matter (smaller than 2.5 microns in effective diameter). Alachua County requests that the permit provide a schedule requiring modification of the Operating Permit to impose EPA emission limits for fine particulate matter immediately upon the date of implementation.

6) The Proposed Title V permit states that prior to initiating tire firing, the gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum 1400 degrees F for at least one hour. Alachua County requests that a condition be added to ensure that continuous temperature data be monitored and that these are available real-time to FDEP and ACEPD.

Should you have any questions or comments about this, please contact Mr. Lalit Lalwani at the above letterhead address or by phone at 352-264-6800.

Sincerely,



Chris Bird, Director  
Alachua County Environmental Protection Department

enclosures (1)

cc. Al Linero, FDEP Tallahassee  
Chris Kirts, FDEP NE District  
David C. Schwartz, Esq.  
Randall Reid, County Manager  
Board of County Commissioners