

**FLORIDA ROCK INDUSTRIES INC**

CEMENT GROUP / 4000 N.W. CR 235 / P.O. Box 459 / Newberry, FL 32669 / (352) 472-4722

February 8, 2008



FEB 12 2008

BUREAU OF AIR REGULATION

Mr. Jeff Koerner, Administrator  
Division of Air Resource Management—New Source Review Section  
Florida Dept. of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

RE: RAI dated February 7, 2008, for Project No. 0010087-031-AC (PSD-FL-350A)  
Facility ID 0010087

Dear Mr. Koerner:

Mr. Phil Lochbrunner and I called Ms. Corrie Branum today to discuss the RAI so that our response would be complete. We appreciate her assistance, and we are providing the following comments.

RAI Item No. 1: Please verify that these are the changes being requested.

*Response: Yes. The summary that you present for EU009 is exactly what we request.*

RAI Item No. 2: Are these changes correct? Please verify that these are the changes being requested. Please explain type of activity that each revised baghouse is conducting.

*Response: Yes. The summary that you present for EU011 is what request, except that, instead of "...two double clinker silos..." as your letter shows, we are requesting "...two separate clinker silos...". (This is shown on pages 3 and 30 of the application and is not a new request.)*

*We have prepared the following description of the baghouses and proposed changes. Please refer to flow sheet nos. 110.59.51-0007 and -0008, which were submitted with the application, as you read the description below:*

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*The Thompson S. Baker Cement Plant in Newberry, FL is undergoing an expansion with the addition of a second production line very similar to the existing line. This includes a second finish mill for the grinding of clinker, gypsum and other additives into cement, the finished product. Also included is the addition of two clinker storage silos (Silo 3 and Silo 4) to store clinker, the*

intermediate product of the kiln. Along with the addition of the new clinker silos, conveyors have been added that will allow clinker produced by either the existing kiln or the new kiln to be transported to both the existing clinker silos (Silo 1 and Silo 2) and to the new clinker silos (Silo 3 and Silo 4).

Originally, the plan called for a single quadrated silo for the new line. After further study, this type of silo—which would have consisted of a cylinder with interior dividers that formed four storage compartments—was determined not to be suitable for cement clinker. (The clinker is a very abrasive material and the flow characteristics in a quadrated silo could result in abrasive wear of the wall partitions.) The capability to store two different types of clinker is needed so the decision to use two separate silos was made. This resulted in the rearrangement of some of the conveyors and dust collectors to accommodate the revised layout.

Clinker from the existing clinker cooler travels on conveyor L01 to a new diverter gate 2L02 which can divert the clinker to an existing diverter gate L04 which either diverts clinker directly to Silo 1 or to existing conveyor L05 which conveys clinker to Silo 2 or to a new conveyor 2L20. The 2L20 conveys clinker to a new conveyor 2L09. From 2L09, the clinker is discharged through a new diverter gate 2L10 which diverts clinker either to Silo 3 or Silo 4.

Clinker from the new clinker cooler travels on new conveyor 2L01 which discharges clinker onto the 2L20 conveyor. The 2L20 conveyor can discharge clinker onto the 2L09 conveyor mentioned in the previous paragraph for discharge into Silo 3 or Silo 4 or 2L20 can convey clinker directly to Silo 1 or Silo 2.

In 1999—when Line 1 began operation—a single dust collector, L06, controlled the dust generated by the discharge of clinker into Silo 1 and Silo 2. The L06 dust collector was located on Silo 1 and vented both silos through a connecting vent duct. Dust collected by L06 was discharged directly into Silo 1. In 2002, a second collector, L08, was permitted through the District and was added to Silo 2 for purpose of increasing dust collection efficiency in Silo 2. Dust collected by L08 was discharged directly into Silo 2.

With the new conveyors, additional transfer points are being added in the area of Silo 2. Effective dust collection is being assured by the replacement of L08 with a collector, 2L15, with a greater capacity. The 2L15 collector will vent Silo 2, the discharge of clinker from conveyor 2L20 to Silo 2, and the transfer of clinker

*from conveyor 2L20 to conveyor 2L09. Collected dust will discharge directly into Silo 2.*

*The collector L08 will be renamed 2L12 and relocated to Silo 3. It will vent Silo 3 and discharge collected dust directly into Silo 3.*

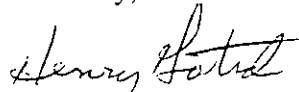
*In addition, new dust collector 2L13 will collect dust from the transfer of clinker from existing conveyor L01 through the new diverter gate 2L02 to conveyor 2L20. Dust collected will be discharged directly into Silo 1. New dust collector 2L16 will collect dust from the transfer of clinker from 2L01 to 2L20 and from the transfer of clinker from 2L20 to 2L09. Collected dust will be returned to conveyor 2L20. Finally, new dust collector 2L18 will vent Silo 4 and will collect dust from the discharge of conveyor 2L09 to diverter gate 2L10. Collected dust from 2L18 will be discharged directly into Silo 4.*

RAI Item No. 3: Please identify any other changes being requested.

*Response: We have no other changes to request.*

Please call Phil Lochbrunner, Project Manager, at 352-472-4722, ext. 103, or me at ext. 121, if you have any other questions or would like clarification on the project. Thank you.

Sincerely,



Henry Gotsch  
Environmental Manager