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Department of Environmental Protection

NORTHEAST DISTRICT
AUG 03 1995
Virginia B. Werhert
DEP - JACKSONVILLE Secretary

Lawton Chiles
Governor

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

August 1, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 34601

Dear Mr. Baker:

RE: Newberry Cement Plant - Review
Files Nos. AC01-267311 and PSD-FL-228

The Department has reviewed your letter that was received on July 3, 1993. Based on our technical review of the information in the application and letter, we request the following information:

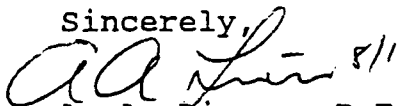
1. Please provide some details regarding the control of unconfined emissions during the handling of coal ash (bottom and fly ash).
2. Iron Oxide storage is shown as a pile under in a covered area. How will it be stored and fugitive emissions controlled if the final iron source chosen contains dusty components and impurities? Is slag from metal smelting under consideration?
3. Submit a projected chemical analysis of the raw materials and additives likely to be used used at this plant.
4. Submit a projected analysis of the cement kiln dust (CKD) based on the likely raw material sources and the process to be used at the planned facility. Indicate if and why this CKD composition may differ from CKD from other plants.
5. Storage tanks facilities meeting the applicability requirements under 40 CFR 60, NSPS Subpart Kb are subject to this regulation. Please evaluate the proposed storage tanks (capacity & emissions) at this facility to determine if they will comply with this regulation.
6. Has Florida Rock Industries applied to the Department for any other required permits (stormwater, solid waste, industrial waste, etc)? What other environmental-related federal or local permits does this facility already have or need (e.g. NPDES, dredge and fill, etc.)? Is the existing mining operation in compliance with its existing permits?

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7. Please describe your program (such as enhanced or continuous monitoring, pollution control equipment maintenance) to insure that emissions limits will be met on a continuous basis.
8. Submit the design specification and the operating and maintenance manual for the equipment (kiln, baghouses, ESP) used at this facility.
9. Has Florida Rock Industries, or its parent company had any violations of Department regulations at any of their facilities? Please provide all documentation in relation to these violations.
10. What will be the qualifications with respect to pollution control of personnel who will operate the Company's Newberry facility? Are any training programs planned for plant personnel in the area of pollution prevention?
11. Is there potential for post combustion formation of dioxins and furans? If so, how will this be minimized?
12. Identify and address the air quality impacts on any sensitive areas in the vicinity of the cement plant (i.e., sources of drinking water, farm crops, fish ponds, livestock, etc.) that may be more susceptible to atmospheric deposition caused by the project's proposed air emissions.

We will continue to conduct our technical evaluation of this project and request the information described above within 30 days to maintain our present review schedule. If you have any questions on this matter, please call me or Teresa Heron (Review Engineer) at (904) 488-1344.

Sincerely,


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

AAL/th/t

cc: J. Harper, EPA
J. Bunyak, NPS
P. Reynolds, NEDB
J. Braswell, DEP
C. Kirts, NED
M. Sullivan, EPD