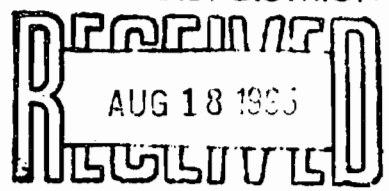




KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ■ FAX 377-7158



August 15, 1995

Mr. A. A. Linero, ~~PI~~ DEP - JACKSONVILLE
Administrator
New Source Review Section
FDEP-DARM-BAR

SUBJECT: K&A 187-94-02
Florida Rock Industries, Inc.
Newberry Cement Plant
Permits Nos. AC01-267311 and PSD-FL-228
Response to Request for Additional Information, dated 01-AUG-1995

Dear Mr. Linero:

Enclosed please find the requested information for the referenced project. The format of this response is as follows:

1. All questions have been reproduced, preserving original numbering.
2. Responses follow each question.

Florida Rock Industries, Inc. hereby requests that the Air Construction Permit application be deemed complete as of August 3, 1995; which was 30 days after Department receipt of the additional information requested on 16-JUN-1995. Permit processing should proceed as the information request of 01-AUG-1995 does not involve substantial new technical information.

If further information is required, please do not hesitate to call me or Steve Cullen (Project Engineer) at (904) 377-5822.

Sincerely,

John B. Koogler, Ph.D., P.E.
Koogler & Associates

RECEIVED

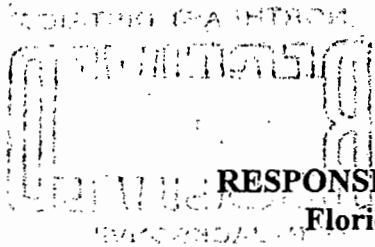
AUG 16 1995

Bureau of
Air Regulation

copy to: Fred Cohrs, FRI

cc: T. Heron
C. Holladay
P. Reynolds, NEDB
* a. Saarinen
* P. Walthers

NED
EPA
NPS
M. Costello



RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Florida Rock Industries, Inc. - Newberry Cement Plant

Permits Nos. AC01-267311 and PSD-FL-228

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APPENDIX A: Analyses of Typical Raw Materials

APPENDIX B: Typical Cement Analyses

APPENDIX C: Personnel Training Program

- 1. Please provide some details regarding the control of unconfined emissions during the handling of the coal ash (bottom and fly ash).**

RESPONSE:

The ash will be loaded into dump trucks at either the Gainesville Regional Utilities power plant or the Seminole (Palatka) power plant. The ash will be loaded either from open stockpiles or directly from nodulizing mixers. Both power plants add 6-8% water to the ash.

At the cement plant the dump trucks will empty the ash into the covered storage hall, from where it will be conveyed into the raw mill for drying and grinding. The ash will be combined in the raw mill with limestone and overburden from the Newberry quarry.

The moisture content of the ash will limit the generation of uncontrolled particulate matter (UPM) emissions.

- 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?**

RESPONSE:

Florida Rock plans to use iron ore only if the power plant ash has a low iron content. Water sprays will be used on iron ore stockpiles, if necessary, to limit the generation of UPM.

Slag from metal smelting is not under consideration as an iron source, because its iron content is too low.

- 3. Submit a projected chemical analysis of the raw materials and additives likely to be used at this plant.**

RESPONSE:

Appendix A contains analyses of the projected raw materials (overburden, limestone, coal ash and iron oxide). The gypsum will be nearly pure calcium sulfate ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$).

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.**

RESPONSE:

CKD (Cement Kiln Dust) is defined in the EPA's *Report to Congress on CKD* (December 1993), as follows:

CKD is a fine-grained solid material generated as the primary by-product of the production of cement. CKD generation results directly from [the smokestack] control of particulate matter that would otherwise be discharged. In contrast to many other residues of industrial production, CKD is essentially an off-specification product: it much more closely resembles the raw material entering and product leaving the operation than many other industrial wastes.

This definition identifies CKD as the particulate matter captured by the ESP at the Florida Rock cement plant; and further describes the CKD as resembling the raw material and product streams. The projected analysis of the CKD at this plant is therefore the projected analyses of the raw materials used (Appendix A) and cement produced (Appendix B).

At many cement plants the CKD is a waste material which is not returned to the process for various process or product quality reasons, such as:

- Raw materials high in alkalis results in CKD high in alkalis, reintroduction to the process would result in off-specification product
- Raw materials high in chlorides results in CKD high in chlorides, reintroduction to the process tends to clog the ducts in the preheater
- Most wet-process kilns are unable to reintroduce the collected dust, as it is difficult to mix the hot dust with the cold slurry

The raw materials to be used at the Florida Rock cement plant are low in alkalis and chlorides, and reintroduction of the CKD into the process precludes the generation of CKD as a waste material.

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 and emissions) at this facility to determine if they will comply with this regulation.**

RESPONSE:

NSPS Subpart Kb applies to "each storage vessel with a capacity greater than or equal to 40 cubic meters (m^3) that is used to store volatile organic liquids".

$$40 m^3 \times 264.17 \text{ gallons}/m^3 = 10,567 \text{ gallons}$$

However, storage vessels with capacities:

1. Less than $75 m^3$ (19,813 gallons), or
2. Greater than $151 m^3$ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kPa (0.5 psi), or
3. Greater than $75 m^3$ (19,813 gallons) but less than $151 m^3$ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 15.0 kPa (2.2 psi),

are subject only to 40CFR60.116b paragraphs (a) and (b). These paragraphs require that the owner or operator "keep readily accessible records (for the life of the source) showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel".

The only volatile organic liquid which will be stored in vessels with capacities greater than $40 m^3$ will be No. 2 fuel oil with a maximum true vapor pressure of less than 0.2 kPa (0.022 psi). The No. 2 fuel oil will most likely be stored in two 12,000 gallon tanks. Any existing and proposed fuel oil storage tanks will only need readily accessible records detailing tank dimensions and capacities. The storage tanks at this plant will comply with the requirements of 40 CFR 60, NSPS Subpart Kb, if applicable.

6. **Has Florida Rock Industries applied to the Department for any other required permits (stormwater, solid waste, industrial waste, etc)? What other environment-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?**

RESPONSE:

Florida Rock has identified the need for two other required permits: a water withdrawal permit and a stormwater management permit. Application has not been made for either of these permits, at this time.

The existing mining operation is in compliance with applicable regulations.

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.**

RESPONSE:

Continuous Emissions Monitors (CEM) measuring stack gas opacity are required for both the clinker cooler stack and the kiln stack by 40CFR60, NSPS Subpart F. These CEMs will be installed and operated as required.

The gas which exits through the kiln/raw mill stack will also be continuously monitored for oxygen and combustibles, including carbon monoxide, for process control.

A minimum of two plant personnel will be trained in the determination of opacity of emissions, to monitor visible emissions from all dust collectors in the plant.

The dust collectors are compartmentalized to allow taking any portion of the collector out of service at any time for inspection and maintenance. During scheduled plant downtime, all of the baghouses will be inspected using ultraviolet light and dye to locate worn or broken bags. Prior to the end of the expected service life of the bags, entire compartments of bags will be replaced.

The electrostatic precipitators (ESPs) operate with automatic voltage control, which keeps the collection capacity at its peak at all times. During scheduled plant downtime, the ESPs are entered for inspection and replacement of suspect electrodes. The ESPs can also be maintained by reducing production rates and isolating single compartments for inspection and maintenance.

Process uniformity is necessary to produce consistent product quality. This process uniformity will limit emissions variability.

8. **Submit the design specification and the operating and maintenance manual for the equipment (kiln, baghouses, ESP) used at this facility.**

RESPONSE:

Design specifications were submitted for the kiln, both ESPs, and the baghouses, as part of the original application. Additional information on the baghouses was submitted on 16-May-1995, 25-July-1995, and 2-August-1995.

Operation and maintenance manuals will not be available until vendors are selected and construction has commenced. Copies of these manuals will be submitted when available, if required.

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.**

RESPONSE:

This information is not necessary for processing the Application to Construct.

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?**

RESPONSE:

The operators will be trained by the equipment suppliers and by experienced plant operating supervisors. The contractual commitment regarding training is included as Appendix C. Personnel training will address all aspects of cement manufacturing and all equipment at the plant, including operation and maintenance of pollution control equipment.

11. **Is there potential for post combustion formation of dioxins and furans? If so, how will this be minimized?**

RESPONSE:

The BIF Rule (Burning of Hazardous Wastes in Boilers and Industrial Furnaces) discusses the post-combustion formation of chlorinated dibenzodioxins and dibenzofurans(CDD/CDF), in Part Three of the Preamble: Standards for Boilers and Industrial Furnaces Burning Hazardous Waste. The following information is excerpted from Section II - Controls for Emissions of Toxic Organic Compounds, Part E - Control of Dioxin and Furan Emissions.

The Agency considers a facility to have the potential for significant CDD/CDF emissions if it is equipped with a dry particulate control device (e.g., fabric filter or electrostatic precipitator) with an inlet gas temperature within the range of 450 to 750°F.

At the Florida Rock cement plant, the typical inlet gas temperature to the ESP, under compound operation, will be approximately 230°F. When the kiln is in direct operation, the typical inlet gas temperature to the ESP will be approximately 430°F.

The proposed plant will not have significant potential for the post-combustion formation of dioxins or furans, based on the inlet gas temperatures to the ESP. The potential for formation of dioxins and furans will also be minimized by chlorine capture in the clinker, and by the use of a gas-conditioning spray tower when the kiln is in direct operation.

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.**

RESPONSE:

The air quality impacts from the cement plant have already been adequately addressed in the submittal of 16-May-1995. Air emissions were modeled, and projected ambient air concentrations were compared with ambient air quality standards. All modeled concentrations are less than applicable Ambient Air Quality Standards (Federal primary and secondary, and State). Further, modeled concentrations are below the Class II area PSD increments, designed to prevent significant deterioration of the air quality in a given area.

The primary air quality standards are established to protect human health, while the secondary standards are defined as follows:

40CFR50.2: National secondary ambient air quality standards define levels of air quality which the Administrator judges necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

62-275.200(3)(c), FAC: "Secondary standard" means an ambient standard established to protect the public welfare including the protection of animal and plant life, property, visibility and atmospheric clarity, and the enjoyment of life and property.

The Florida Ambient Air Quality Standards (FAAQS) are more restrictive than the National secondary ambient air quality standards, and are established to protect human health and public welfare as defined by 62-275.200(3)(c).

Table 12-1 shows the maximum modeled ambient air concentrations of the air emissions (including the 20-D inventory and background concentrations where appropriate) as compared to the applicable FAAQS.

**TABLE 12-1
MAXIMUM AMBIENT CONCENTRATIONS VERSUS FAAQS**

**FLORIDA ROCK INDUSTRIES, INC.
NEWBERRY CEMENT PLANT
ALACHUA COUNTY, FLORIDA**

| POLLUTANT | AVG. PERIOD | CONCENTRATION, ug/m³ | FAAQS, ug/m³ | %/FAAQS |
|------------------|--------------------|--|--------------------------------|----------------|
| PM10 | 24-HOUR | 55 | 150 | 37% |
| PM10 | ANNUAL | 31 | 50 | 62% |
| SO2 | 3-HOUR | 205 | 1300 | 16% |
| SO2 | 24-HOUR | 65 | 260 | 25% |
| SO2 | ANNUAL | 15 | 60 | 25% |
| NOx | ANNUAL | 37 | 100 | 37% |
| CO | 1-HOUR | 142 | 40,000 | 0.4% |
| CO | 8-HOUR | 99 | 10,000 | 1% |
| LEAD | QUARTERLY | <0.01 | 1.5 | 1% |

APPENDIX A

ANALYSES OF TYPICAL RAW MATERIALS

5420 Old Orchard Road, Skokie, Illinois 60077-1030
708/965-7500 800/522-2CTL Fax: 708/965-6541

Client: **Cohrs Company, Inc.**
Project: **Chemical analysis**
Submitter: **Mr. Fred Cohrs**
Date: **9/16/94**

CTL Project No.: **000035**
CTL Proj. Mgr.: **Dr. John Fraczek**
Analyst: **Don Broton**
Approved: **Ela Shkolnik**

REPORT OF CHEMICAL ANALYSIS

Client's Sample ID: **N2 Overburden Pile**
CTL Sample ID: **912597**

| <u>Analyte</u> | <u>Weight %</u> |
|------------------|-----------------|
| SiO2 | 54.09 |
| Al2O3 | 20.19 |
| Fe2O3 | 2.96 |
| CaO | 6.09 |
| MgO | 0.43 |
| SO3 | 0.09 |
| Na2O | 0.05 |
| K2O | 0.10 |
| TiO2 | 0.80 |
| P2O5 | 1.63 |
| Mn2O3 | 0.02 |
| SrO | 0.17 |
| LOI | 12.44 |
| <u>Total</u> | <u>99.05</u> |
| Alkalies as Na2O | 0.11 |
| Ca as CaCO3 | 10.87 |

Notes:

1. This analysis represents specifically the sample submitted.
2. Results reported on an oven dry (105C) basis.
3. Oxide analysis by X-ray fluorescence spectrometry. Samples fused at 1000C with Li2B4O7.
4. Elemental sulfur and sulfide sulfur may be lost during high temperature fusion.

CTL Structural/Architectural Engineering,
Consulting, & Materials Technology

5420 Old Orchard Road, Skokie, Illinois 60077-1030
708/965-7500 800/522-2CTL Fax: 708/965-6541

Client: **Cohrs Company, Inc.**
Project: **Chemical analysis**
Submitter: **Mr. Fred Cohrs**
Date: **9/16/94**

CTL Project No.: **000035**
CTL Proj. Mgr.: **Dr. John Fraczek**
Analyst: **Don Broton**
Approved: **Ela Shkolnik**

REPORT OF CHEMICAL ANALYSIS

Client's Sample ID: **N3 Grey Brown Clay- Pipe Filling. North Pit, North Face**
CTL Sample ID: **912598**

| <u>Analyte</u> | <u>Weight %</u> |
|--------------------------------|-----------------|
| SiO ₂ | 74.08 |
| Al ₂ O ₃ | 14.95 |
| Fe ₂ O ₃ | 1.61 |
| CaO | 1.21 |
| MgO | 0.28 |
| SO ₃ | 0.06 |
| Na ₂ O | <.02 |
| K ₂ O | 0.06 |
| TiO ₂ | 0.58 |
| P ₂ O ₅ | 1.12 |
| Mn ₂ O ₃ | 0.02 |
| SrO | 0.11 |
| LOI | 6.10 |
| <u>Total</u> | <u>100.19</u> |
| Alkalies as Na ₂ O | 0.04 |
| Ca as CaCO ₃ | 2.17 |

Notes:

1. This analysis represents specifically the sample submitted.
2. Results reported on an oven dry (105C) basis.
3. Oxide analysis by X-ray fluorescence spectrometry. Samples fused at 1000C with Li₂B₄O₇.
4. Elemental sulfur and sulfide sulfur may be lost during high temperature fusion.

5420 Old Orchard Road, Skokie, Illinois 60077-1030
708/965-7500 800/522-2CTL Fax: 708/965-6541

Client: Cohrs Company, Inc.

CTL Project No.: 000035

Project: Chemical analysis

CTL Proj. Mgr.: Dr. John Fraczek

Submitter: Mr. Fred Cohrs

Analyst: Don Broton

Date: 9/16/94

Approved: Ella Shkolnik

REPORT OF CHEMICAL ANALYSIS

Client's Sample ID: N4 Sand- Pipe Filling, North Pit, North Face
CTL Sample ID: 912599

| <u>Analyte</u> | <u>Weight %</u> |
|--------------------------------|-----------------|
| SiO ₂ | 95.26 |
| Al ₂ O ₃ | 2.92 |
| Fe ₂ O ₃ | 0.44 |
| CaO | 0.14 |
| MgO | <.01 |
| SO ₃ | 0.04 |
| Na ₂ O | <.02 |
| K ₂ O | 0.02 |
| TiO ₂ | 0.22 |
| P ₂ O ₅ | 0.13 |
| Mn ₂ O ₃ | 0.01 |
| SrO | 0.03 |
| LOI | 0.91 |
| <u>Total</u> | <u>100.14</u> |
| Alkalies as Na ₂ O | 0.01 |
| Ca as CaCO ₃ | 0.26 |

Notes:

1. This analysis represents specifically the sample submitted.
2. Results reported on-an oven dry (105C) basis.
3. Oxide analysis by X-ray fluorescence spectrometry. Samples fused at 1000C with Li₂B₄O₇.
4. Elemental sulfur and sulfide sulfur may be lost during high temperature fusion.

5420 Old Orchard Road, Skokie, Illinois 60077-1030
708/965-7500 800/522-2CTL Fax: 708/965-6541

Client: **Cohrs Company, Inc.**
Project: **Chemical analysis**
Submitter: **Mr. Fred Cohrs**
Date: **9/16/94**

CTL Project No.: **000035**
CTL Proj. Mgr.: **Dr. John Fraczek**
Analyst: **Don Broton**
Approved: **Ella Shkoinik**

REPORT OF CHEMICAL ANALYSIS

Client's Sample ID: **N5 Limestone - South Pit, Below Floor Level**
CTL Sample ID: **912600**

| <u>Analyte</u> | <u>Weight %</u> |
|--------------------------------|-----------------|
| SiO ₂ | 1.80 |
| Al ₂ O ₃ | 0.34 |
| Fe ₂ O ₃ | 0.23 |
| CaO | 53.71 |
| MgO | 0.27 |
| SO ₃ | 0.04 |
| Na ₂ O | 0.04 |
| K ₂ O | 0.01 |
| TiO ₂ | 0.01 |
| P ₂ O ₅ | 0.14 |
| Mn ₂ O ₃ | 0.01 |
| SrO | 0.02 |
| LOI | 42.94 |
| <u>Total</u> | <u>99.57</u> |
| Alkalies as Na ₂ O | 0.05 |
| Ca as CaCO ₃ | 95.85 |

Notes:

1. This analysis represents specifically the sample submitted.
2. Results reported on an oven dry (105C) basis.
3. Oxide analysis by X-ray fluorescence spectrometry. Samples fused at 1000C with Li₂B₄O₇.
4. Elemental sulfur and sulfide sulfur may be lost during high temperature fusion.

FROM: OMNIFAX(1)

TO:

703

OCT 3, 1994 10:02AM #413 P.02



COMMERCIAL TESTING & ENGINEERING CO.

GENERAL OFFICES: 1919 SOUTH HIGHLAND AVE., SUITE 210 B, LOMBARD, ILLINOIS 60148 • TEL: 708 953-9300 FAX: 708-953-9305

Member of the SGS Group (Société Générale de Surveillance)

PLEASE ADDRESS ALL CORRESPONDENCE TO
216 OXMOOR CIRCLE, BIRMINGHAM, AL 35209
TEL: (205) 942-3120
FAX: (205) 942-0914

May 31, 1994

Gainesville Regional Utilities
P.O. Box 147117
Gainesville Florida 32614

Sample identification by
Gainesville Regional Utilities

Kind of sample reported to us Bottom Ash - Unit 2 Boiler

Sample taken at Deerhaven Generating Station

Sample taken by Gainesville Regional Utilities

Date sampled -----

Date received May 24, 1994

Analysis Report No. 73-47377

| <u>ANALYSIS OF ASH</u> | <u>WEIGHT %, IGNITED BASIS</u> |
|------------------------|--------------------------------|
| Silicon dioxide | 54.77 |
| Aluminum oxide | 28.88 |
| Titanium dioxide | 1.45 |
| Iron oxide | 8.28 |
| Calcium oxide | 2.16 |
| Magnesium oxide | 0.93 |
| Potassium oxide | 2.38 |
| Sodium oxide | 0.40 |
| Sulfur trioxide | 0.17 |
| Phosphorus pentoxide | 0.26 |
| Strontium oxide | 0.15 |
| Barium oxide | 0.08 |
| Manganese oxide | 0.09 |
| Undetermined | 0.00 |
| | <u>100.00</u> |

Silica Value = 82.81
Base:Acid Ratio = 0.17
T250 Temperature = 2813 °F
Loss On Ignition = 13.50

Type of Ash = BITUMINOUS
Fouling Index = 0.07
Slagging Index = xxxxx

Respectfully submitted,
COMMERCIAL TESTING & ENGINEERING CO

John T. [Signature]



RESOURCE MATERIALS TESTING, INC.

"Specialists in Fly Ash Testing"

RECEIVED

AUG - 9 1994

REPORT OF FLY ASH ANALYSIS

JTM INDUSTRIES

TO: JTM Industries
Attn: Mr. Larry Perryman
1000 Cobb Place Blvd., Bldg. 400
Kennesaw, GA 30144

PROJECT NO.: RMT-169
SAMPLE NO.: 5472
DATE REC.: 7-6-94
DATE REP.: 8-8-94

PROJECT NAME: Palatka Plant Fly Ash Quality Assurance Program
SAMPLE ID: Class F Fly Ash Jun '94

| CHEMICAL ANALYSES | | | |
|---|---------|------------------------|-----|
| PARAMETER | RESULTS | ASTM C618 SPEC. F/C | |
| Silicon Dioxide, SiO ₂ , % | 48.78 | --- | |
| Aluminum Oxide, Al ₂ O ₃ , % | 22.26 | --- | |
| Iron Oxide, Fe ₂ O ₃ , % | 19.89 | --- | |
| Sum of SiO ₂ , Al ₂ O ₃ and Fe ₂ O ₃ , % | 90.93 | 70/50 | min |
| Calcium Oxide, CaO, % | 4.19 | --- | |
| Magnesium Oxide, MgO, % | 0.72 | --- | |
| Sodium Oxide, Na ₂ O, % | --- | --- | |
| Potassium Oxide, K ₂ O, % | --- | --- | |
| Sulfur Trioxide, SO ₃ , % | 0.72 | 5.0 | max |
| Moisture Content, % | 0.30 | 3.0 | max |
| Loss on Ignition, % | 4.73 | 6.0 | max |
| Available Alkalies as Na ₂ O, %* | 0.76 | 1.5 | max |
| PHYSICAL ANALYSES | | | |
| Amount Retained on No. 325 Sieve, % | 14.3 | 34 | max |
| Strength Activity Index | | | |
| Portland Cement at 7 days, % of Control | 94 | 75 | min |
| Portland Cement at 28 days, % of Control | 100 | 75 | min |
| Water Requirement, % of Control | 98 | 105 | max |
| Autoclave Expansion, % | -0.02 | 0.8 | max |
| Specific Gravity | 2.48 | --- | |
| Increase of Drying Shrinkage, %* | --- | 0.03 | max |
| Reactivity with Cement Alkalies, %* | --- | --- | |
| Reduction of Mortar Expansion, % | --- | --- | |
| Mortar Expansion, % | --- | 0.020 | max |
| Air Entrainment of Mortar, % | --- | --- | |

*Optional requirements applicable only when requested by purchaser.
This material meets the requirements of ASTM C618 for the parameters tested, and FL DOT 929.

By Robert L. Smith
Robert L. Smith, Ph.D.

JTM

| | | | |
|-------|--------------|---------|----------------|
| To | Fred Coors | From | Davi. Marshall |
| Co. | | Co. | JTM |
| Dept. | | Phone # | |
| Fax # | 703-772-9468 | Fax # | |

FACE BOULEVARD
 DING 400
 GEORGIA 30144
 (404) 424-1900
 FAX (404) 424-9290

IRON CALCINE

(Label Name)

Iron Oxide Dust

(Common Name)

Prepared: May 29, 1992

Material Safety Data Sheet

(404) 424-1900

Information Phone Number

(800) 241-7799

Emergency Phone Number

SECTION 1 - MATERIAL IDENTIFICATION AND INFORMATION

| COMPONENTS - Common Name & Chemical Name (Hazardous Components 1% or greater; Carcinogens 0.1% or greater) | % | OSHA PEL* (mg/m ³) | ACGIH TLV* (mg/m ³) |
|---|------|-----------------------------------|------------------------------------|
| Iron Oxide (Fe ₂ O ₃ and Fe ₃ O ₄) | > 85 | 10 | 10 |

* These are atmospheric concentrations based on time weighed averages.

** Non-Hazardous Ingredients: Moisture < 15%.

SECTION 2 - PHYSICAL/CHEMICAL CHARACTERISTICS

| | | | |
|--|------------------|---|--------------|
| Boiling Point | N/A ⁺ | Specific Gravity (H ₂ O = 1) | 5.1 - 5.3 |
| Vapor Pressure (mm Hg and Temperature) | N/A | Melting Point | 1600°C |
| Vapor Density (Air = 1) | N/A | Evaporation Rate | N/A |
| Solubility in Water | Insoluble | Water Reactive | Not Reactive |

Appearance and Odor - Dark red - black powder, no odor.

SECTION 3 - FIRE AND EXPLOSION HAZARD DATA

Flash Point and Method Used: N/A Auto-Ignition Temperature: N/A
 Flammability Limits in Air % by Volume: N/A LEL: N/A UEL: N/A
 Extinguisher Media: No special media required. Special Fire Fighting Procedures: No special procedures required.
 Unusual Fire and Explosion Hazards: None, this material is considered non-flammable and non-combustible.

SECTION 4 - REACTIVITY HAZARD DATA

STABILITY: Not known, considered stable.
 HAZARDOUS DECOMPOSITION PRODUCTS: Not known, none expected.
 HAZARDOUS POLYMERIZATION: Not known, none expected.

+ Not Applicable

Prepared by: KBK Enterprises, Inc., 1000 Cobb Place Boulevard, Building 400, Kennesaw, Georgia 30144



A Union Pacific Company

APPENDIX B

TYPICAL CEMENT ANALYSES



FLORIDA CRUSHED STONE COMPANY
CEMENT PLANT

Consignee:
Destination:

Date: August 8, 1995
Silo # 1

| | | | |
|---|------|------|------|
| %Silicon Dioxide (SiO ₂) | 21.3 | 20.0 | - |
| %Aluminum Oxide (Al ₂ O ₃) | 4.9 | - | 6.0 |
| %Ferric Oxide (Fe ₂ O ₃) | 3.4 | - | 6.0 |
| %Calcium Oxide (CaO) | 64.3 | - | - |
| %Magnesium Oxide (MgO) | 0.8 | - | 6.0 |
| %Tricalcium Silicate (C ₃ S) | 54 | - | 55 |
| %Tricalcium Aluminate (C ₃ A) | 7.1 | - | 8 |
| When (C ₃ A) is 8% or less: | 2.8 | - | 3.0 |
| When (C ₃ A) is 8% or more: | - | - | 3.5 |
| %Alkalis (Na ₂ O+0.658 K ₂ O) | 0.38 | - | 0.60 |
| %Insoluble Residue | 0.27 | - | 0.75 |
| %Loss of Ignition | 1.6 | - | 3.0 |
| Blaine Fineness M ₂ /KG | 373 | 280 | 400 |
| Autoclave Expansion | 0.01 | - | 0.80 |
| Initial (minutes): | 119 | 60 | - |
| Final (minutes): | 215 | - | 600 |
| 1 Day PSI | 2090 | - | - |
| 3 Day PSI | 3600 | 1800 | - |
| 7 Day PSI | 4990 | 2800 | - |
| Heat of Hydration (Cal/g) | 78.5 | - | 80 |
| % Air Content | 8.0 | - | 12 |

The data shown above is typical of the cement currently being shipped from this silo.
This cement complies with current ASTM-C150 specifications for TYPE I/II Cement, AASHTO M-85 specifications for TYPE I and TYPE II Cement.
Certificate prepared by this certification was furnished to the State.

O.N. Wheeler

O.N. Wheeler
Manager, Quality Control

Company:

Project #:

Signed:



FLORIDA CRUSHED STONE COMPANY
CEMENT PLANT

Consignee:
Destination:

Date: August 8, 1995
Silo # 2

| | | | |
|---|------|------|------|
| %Silicon Dioxide (SiO ₂) | 21.2 | 20.0 | - |
| %Aluminum Oxide (Al ₂ O ₃) | 4.9 | - | 6.0 |
| %Ferric Oxide (Fe ₂ O ₃) | 3.4 | - | 6.0 |
| %Calcium Oxide (CaO) | 64.2 | - | - |
| %Magnesium Oxide (MgO) | 0.8 | - | 6.0 |
| %Tricalcium Silicate (C ₃ S) | 54 | - | 65 |
| %Tricalcium Aluminate (C ₃ A) | 7.2 | - | 8 |
| When (C ₃ A) is 8% or less: | 2.8 | - | 3.0 |
| When (C ₃ A) is 8% or more: | - | - | 3.5 |
| %Alkalis (Na ₂ O+0.658 K ₂ O) | 0.38 | - | 0.80 |
| %Insoluble Residue | 0.27 | - | 0.75 |
| %Loss of Ignition | 1.8 | - | 3.0 |
| Blaine Fineness M ₂ /KG | 391 | 280 | 400 |
| Autoclave Expansion | 0.01 | - | 0.80 |
| Initial (minutes): | 118 | 60 | - |
| Final (minutes): | 216 | - | 600 |
| 1 Day PSI | 2250 | - | - |
| 3 Day PSI | 3820 | 1800 | - |
| 7 Day PSI | 6260 | 2800 | - |
| Heat of Hydration (Cal/g) | 78.6 | - | 80 |
| %Air Content | 7.9 | - | 12 |

The data shown above is typical of the material currently being shipped from this site.
This cement complies with current ASTM-C150 specifications for TYPE I/II Cement, AASTO M40 specifications for TYPE I and TYPE II Cement.
Copies represented by this certification was furnished to the State.

O.N. Wheeler
O.N. Wheeler
Manager, Quality Control

Company:

Project #:

Signed:

APPENDIX C

PERSONNEL TRAINING PROGRAM

POLYSIUS CORPORATION

Division of Krupp USA, Inc.

Florida Rock
Project No. 6823-2200A
May 15, 1995

8.7 Operator Training

Polysius will provide lecturers and appropriate instruction materials to support and complement the Owner's operator training program. Instruction will be given in operation of equipment and process and in the proper maintenance procedures of the equipment, including safety precautions. The following is a description of the proposed training.

8.7.1 Equipment Included

The program will cover the following equipment:

- A. The Polysius Raw Material Roller Mill System with Integrated SEPOL® Separator.
- B. The Polysius kiln and burner system.
- C. The Polysius Cement Ball Mill and SEPOL® Separator.
- D. Auxiliary equipment.

8.7.2 Duration

Polysius will provide five (5) days (40 classroom hours) of instruction in operation of the equipment and maintenance procedures. Included is the cost of Polysius in-house preparation of the program.

8.7.3 Location

The training program will take place at the Florida Rock Plant site. Owner will furnish suitable classroom space.

8.7.4 Owner's Personnel

A. Quantity

In order to optimize the instructor/student ratio and to provide for the most efficient use of the available classroom time it is recommended that the number of personnel be limited to:

- a. Five (5) operating personnel
- b. Five (5) maintenance personnel

B. Qualifications

The program will cover the theoretical, technical and practical aspects of the equipment. In selecting personnel, we assume that you will assign people who have the required education and background to qualify them for the theoretical and practical aspects of operating and maintaining the subject equipment.

POLYSIUS CORPORATION

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C. Pre-Program Preparation

It is recommended that all personnel thoroughly familiarize themselves with the flowsheets, plot plan, layout and arrangement drawings prior to attending the program. It is also assumed that all personnel will have read and studied the operation and maintenance manuals for the equipment and auxiliary equipment, prior to classroom date.

8.7.5 Training Aids

The following training aids will be utilized in the program:

- A. Owner's copies of operation and maintenance manuals.
- B. Handout materials
- C. Slides
- D. Transparencies for overhead (opaque) projector
- E. Examination of equipment in the field

8.7.6 Subject Material

The following subject material will be covered in the program.

A. Familiarization

- a. Review of flowsheets
- b. Review of plot plan
- c. Equipment location and description
- d. Material flow
 - Solids
 - Gases

B. Instruments and Control Equipment

- a. Review of instrumentation furnished
- b. Instrument identification
 - Purpose of instruments (local and central)
 - Location
 - Interpreting read-out devices
 - Calibration techniques

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C. Control Concepts

- a. Object of control loop
 - Primary goal
 - Effect on process
 - Alternatives
- b. Operation
- c. Control methods used to accomplish goals
- d. Operating problems eliminated by use of control concept employed

D. Mechanical

- a. Start-up characteristics
 - Start-up procedures
 - Interlocks
 - Pre-start checklist
- b. Operating nomenclature and criteria
 - Equipment description
 - Purpose
- c. Lubrication, cooling and control features
 - Type of lubrication system
 - Type of cooling system
 - Instrument controls
 1. Local
 2. Central panel

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- E. Electrical Interlocks
 - a. Prime function for each piece
 - b. Physical location of equipment
 - c. Interlock sequence within each system
 - d. Normal start-up and shutdown sequence
 - e. Emergency shutdown sequence
 - f. Troubleshooting

- F. Theory of Operations
 - a. Overview of cement technology
 - b. Definition of terms
 - c. Process discussions

- G. Panel Practice
 - a. Organization of panel
 - b. Function of panel instruments
 - c. How to read instruments
 - d. Normal operating procedures
 - e. Abnormal operating procedures

- H. Mechanical Maintenance
 - a. Elements of mechanics
 - b. Lubrication
 - c. Drive components
 - d. Bearings

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- e. Piping systems
- f. Basic hydraulics
- g. Pumps

8.7.7 Summary

Exclusions

- A. Set-up of maintenance standards (target times, crew size, etc.)
- B. Furnishing of slide projector, overhead (opaque) projector and screen.
- C. Additional operation and maintenance manuals to those listed in the equipment supply contract.
- D. Instructors from subsuppliers.

8.7.8 Owner's Responsibilities

- A. Furnish suitable classroom space and facilities
- B. Furnish blackboard, chalk and eraser
- C. Furnish slide projector and overhead (opaque) projector to Polysius specifications
- D. Furnish screen for projectors
- E. Furnish all supplies (paper, pencils, blueprints, etc.) for use by Owner's personnel
- F. Make available Owner's copies of operation and maintenance manuals for use by Owner's personnel

8.8 Meetings and Reports

Regular progress meeting shall be held every four (4) weeks during the engineering installation phase of the project. Monthly progress reports shall be issued to show compliance with the various schedules, identify bottlenecks and describe overall progress.

8.9 Suppliers and Subsuppliers Personnel

Polysius will submit to Owner a list of its own and of subsuppliers personnel anticipated to be on site during the project.