



July 25, 2000

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Mr. Al Linero,
Florida Department of
Environmental Protection
Twin Towers Office Building
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

BUREAU OF AIR REGULATION

Re: DEP File No. AC01-267311
PSD-FL-228 – Facility Id. No. 0010087
Cement Plant – Newberry, Alachua County, Florida

Dear Mr. Linero,

Following is the response to your letter to John Baker dated July 18, 2000.

REQUEST FOR INFORMATION No. 1

List the remaining tasks to be performed to complete installation and fine-tuning of plant equipment and the approximate dates for completing those tasks.

Response: Installation of all plant equipment is now complete with the possible exception of replacement CEM equipment as discussed in item 2 below.

The initial NO_x limit imposed by the permit is being met. Additional fine-tuning may be required to meet the lower NO_x limit to be met prior to the expiration of a 2-year period of operation.

With respect to the optional use of tire derived fuel, we are studying available and proven methods of feeding TDF to the pyro processing system. We will advise the Department of any decisions made in this regard and give notice of any performance testing to demonstrate compliance.

REQUEST FOR INFORMATION No. 2

Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.

Response: The plant first achieved and maintained production at the permitted capacity on or about May 18, 2000. Thus, no further work is required to demonstrate that the plant can operate at the permitted production rate.

The initial performance tests required by FDEP Permit AC 01-267311 were completed as of July 24, 2000, with the exception of visible emission observations of 13 minor emission points within the plant.

These include all of the emission measurements on the kiln and clinker cooler required by the referenced air construction permit and also all of the visible emissions observations on the kiln, the cooler, and five (5) minor material handling emission points throughout the plant. The remaining visible emission observations should be completed by July 31, 2000.

These tests have been conducted at the permitted levels of production, as required by specific condition No. 6 and within 90 - 100% of the maximum operating rate allowed by the permit, as required by Section 62-297.310 (2) FAC.

We plan to conduct additional testing to differentiate between total hydrocarbon emissions and volatile (non-methane) hydrocarbon emissions. These tests should be completed by August 31, 2000. The continuous emissions monitoring system (CEMs) for sulfur dioxide will be further evaluated. Adjustment and/or modifications may be required for these CEMs. It is anticipated that this matter can be completed by August 15, 2000. If the evaluation results in the need to purchase new CEM equipment, FRI will notify the Department with the anticipated delivery and installation dates.

REQUEST FOR INFORMATION No. 3

Provide a statement: (and basis for believing) that the facility will comply with applicable regulation.

Response: The facility will comply with all applicable regulations. The question was addressed in the Department's Final Order, dated December 12, 1996; in the case of HCA v. FRI and DEO, DOAH Case No. 95-5531, Florida Department of Environmental Regulation Case No. OGC95-2495. The project as contemplated to be completed under terms of Construction Permit No. AC01-267311, and all relevant operational parameters has not changed since issuance of the final order, which includes the determination that reasonable assurance had been provided that all applicable Department standards would be met.

Please call me at 800-874-8382, extension 307 if you feel your questions have not been sufficiently answered.

Best regards,



Fred W. Cohrs
Vice President

FWC/bc

Cc: John D. Baker III, FRI
Cary O. Cohrs, FRI
John Koogler, P.E., Koogler & Associates
Chris Kirts, DEP NED