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October 27, 2000

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STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
NORTHWEST DISTRICT - JAX  
Via Hand Delivery

Mr. Howard C. Rhodes, Director  
Division of Air Resource Management  
Florida Department of Environmental Protection  
111 S. Magnolia Drive - Suite 23  
Tallahassee, FL 32301

Re: Florida Rock Industries, Inc.  
Thompson S. Baker Cement Plant, Newberry  
SO2 Continuous Emission Monitoring  
FDEP Permit No. AC01-267311; PSD-FL-228

Dear Mr. Rhodes:

The purpose of this letter is to update you on the status of the continuous emission monitoring for sulfur dioxide (SO2) at the Thompson S. Baker Cement Plant in Newberry, Florida.

A continuous emission monitor supplied by Air World is presently installed and working well to measure the SO2 emissions from the kiln/raw mill stack. This is a stand-alone unit with its own sampling system. It was installed and calibrated on August 9, 2000. It is on loan from the supplier, Air World, until a replacement arrives, to be manufactured by SICK USA.

The unit originally supplied to measure SO2 was also supplied by Air World, and was installed on or about the last half of June, 2000. It was in the form of a cell, as part of a multi gas component system. Certification of the SO2 CEM component was attempted in early July, 2000. The NOx CEM component was certified on July 14, 2000, and has been working as designed since then.

While NOx has been accurately measured on a continuous basis by the appropriate CEM component, the SO2 instrument exhibited excessive drift and was ultimately rejected as unacceptable and unreliable to be used as a scientific measuring device for the purpose it was installed. Essentially, the company was unable to certify the SO2 CEM because neither the stability nor the accuracy of the instrument could be established and maintained.

The loaner unit is being replaced by an instrument manufactured in Minnesota by SICK USA. The new instrument is scheduled to arrive in Newberry in the 2nd half of November 2000 and will be in service shortly thereafter.

Howard Rhodes, Director  
October 27, 2000  
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The Jacksonville FDEP Office was notified by FRI's consultant of the plan and that office understood and did not raise any other questions. The kiln at the FRI facility was shut-down today for a 10-day maintenance period. It is scheduled to be restarted on or about Wednesday, November 8, 2000. The company will commence a 7-day drift test on the loaner instrument now in use, and we expect that it will be certified by November 15, 2000. FRI could keep this unit in service indefinitely, as it is certain that it is reliable. Nevertheless, the company prefers to upgrade to a SICK analyzer, which has now received EPA approval. That CEM will be certified upon installation.

SO2 emissions continue to be at extremely low levels. To demonstrate compliance with the SO2 limits in the permit, the company conducted an SO2 Compliance Stack Test on July 13, 2000, and the results were reported to FDEP on August 28, 2000. The SO2 compliance test reported on August 28, 2000, demonstrated an average emission rate of 1.4 lbs/hour compared to an allowable 28.8 lbs/hour.

I hope that this information will serve to keep you and your staff informed as to the status of the SO2 CEMs at the Newberry facility. Please let me know if you have any questions or comments.

Sincerely,



Segundo J. Fernandez

c: Kirby Green, Deputy Secretary, FDEP  
Christopher L. Kirts, Air Program Administer  
Al Linero, P.E., Administrator  
Fred W. Cohrs, Vice President, FRI  
John B. Koogler, Ph.D., P.E.  
Timothy P. Atkinson