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September 27, 2000

Via Facsimile (922-5380) and U.S. Mail

Mr. Kirby B. Green, III
Deputy Secretary
Florida Department of Environmental Protection
3900 Commonwealth Blvd., MS-47
Tallahassee, FL 32399-3000

RE: Florida Rock Industries
Thompson S. Baker Cement Plant
Newberry, Alachua County

Dear Mr. Green:

This is a follow-up to your letter of September 20, 2000 and my letter in response of the same date.

Following our exchange of correspondence, Florida Rock conducted a stack compliance test for VOC emissions on Saturday, September 23, 2000. The test, which was previously scheduled to be conducted on September 22, 2000, was postponed for one day to enable the facility to operate under representative conditions. DEP was advised of the postponement by e-mail on September 22nd, (Attachment 1).

The compliance test was successfully completed. The measured VOC emissions were below the limit in the permit. I am enclosing a copy of a letter from Dr. John B. Koogler to Chris Kirts of FDEP, Jacksonville, dated September 25, 2000 reporting a summary of the results (Attachment 2). A complete test report is being prepared for prompt submission to the agency.

I am also enclosing a letter, also dated September 25, 2000, from Florida Rock's Vice President Fred W. Cohrs to Chris Kirts, (Attachment 3) reporting on various steps taken by the company to assure continued operation in full compliance with all applicable requirements.

Mr. Kirby B. Green, III
Deputy Secretary
September 27, 2000
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Mr. Cohrs' letter referred to the company's efforts to locate mill scale with low THC content. We can report to you today that the company's pursuit of this option has been successful, and that the company is now ready to commence production of Type II cement using low THC mill scale as the source of iron for the production process. In an overabundance of caution, the company had the new mill scale tested by *Environmental Conservation Laboratories, Inc (ENCO) of 4810 Executive Park Ct., Jacksonville, FL*. The test results were received by Florida Rock on September 22. A copy of those results are enclosed (Attachment 4). Additionally, on September 26, Mr. Cary Cohrs, Manager of the Thompson S. Baker Cement Plant visited *Levand Steel & Supply Corp. of 1849 Crestwood Blvd., Birmingham, AL* to ascertain the long-term availability of this clean mill scale. Please note that in the test results, at page 2 of 4, a side-by-side comparison of hydrocarbon content of the new mill scale (from Levand Steel) is made. The mill scale previously used at Florida Rock is labeled "Bulk Material". This comparison reveals that the previously used mill scale, which contributed to the anomalous high VOC readings, contained 11,000 mg/Kg (approximately 1.1%) total hydrocarbons by weight, as compared to the new low THC mill scale, (approximately 0.062%) total hydrocarbons by weight. This represents approximately 1/18th of the total hydrocarbon input under the previous operation.

Your letter of September 20 requested that Florida Rock cease adding mill scale to its cement production process, noting that the type of mill scale utilized by Florida Rock was the suspected source of the VOC emissions. The company proposes to immediately start using the new mill scale which it believes will enable it to operate in full compliance with the current limits for VOC in the permit. The company seeks your concurrence in this course of action, and would, of course, schedule an appropriate stack test upon reaching representative operating conditions with the new mill scale in the raw mix, to demonstrate continued compliance with the permitted VOC limit.

Please advise as soon as possible. The company's management and technical consultants are available at a moments notice to answer any questions you may have.

Sincerely,



Segundo J. Fernandez

SJF:brmg
Enclosure

cc: John D. Baker, II
Fred W. Cohrs
Cary Cohrs
Larry Morgan

Ernest Frey
Chris Kirts
Trina Vielhauer
Howard Rhodes

Al Linero
George Townsend
Lalit Lalwani

Florida Rock Industries, Inc

Subject: Florida Rock Industries, Inc
Date: Fri, 22 Sep 2000 16:30:29 -0400
From: "Timothy P. Atkinson" <tatkinson@ohfc.com>
Organization: Oertel, Hoffman, Fernandez & Cole, P.A.
To: Christopher.Kirts@dep.state.fl.us, Kirby.Green@dep.state.fl.us, Trina.Vielhauer@dep.state.fl.us,
Ernest.Frey@dep.state.fl.us, Howard.Rhodes@dep.state.fl.us, Doug.Beason@dep.state.fl.us
BCC: Segundo Fernandez <sfernandez@ohfc.com>, Terry Cole <tcoble@ohfc.com>,
Fred Cohrs <fcohrs@flarock.com>, John Baker <jdbaker@flarock.com>,
"Dr. John Koogler" <Koogler@worldnet.att.net>, Cary Cohrs <caryc@flarock.com>

Dear Chris -

We tried to reach both you and Ernie Frey by telephone this afternoon at your Jacksonville office. As you probably know, State offices in Tallahassee have been closed all day due to Tropical Storm Helene. We nevertheless tried to reach OGC, but their voice mail box was full, as well as Kirby Green, but there was no answer at his number.

We understand that due to operational difficulties, causing failure to reach representative operating conditions, the stack test at Florida Rock in Newberry could not be conducted this afternoon, even though the testing team and FDEP observers were assembled. We understand that the test has been rescheduled for tomorrow morning, and that the appropriate FDEP observers have been notified and have committed to being there.

You probably know about this already, but we wanted to make sure you knew.

Please contact us if you have any questions.

Sincerely,
Tim Atkinson
Segundo J. Fernandez

c: Kirby Green, III
Ernest Frey
Howard Rhodes
Doug Beason
Trina Vielhauer

Timothy P. Atkinson
Oertel, Hoffman, Fernandez & Cole, P.A.

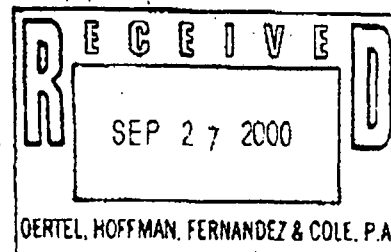
Attachment 1

**ENVIRONMENTAL SERVICES**

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA 187-00-09

September 25, 2000

**VIA FAX AND MAIL**

Mr. Chris Kirts
Florida Department of
Environmental Protection
7825 Baymeadows Way Suite B-200
Jacksonville, FL 32256-7590

Subject: Florida Rock Industries
Thompson S. Baker Cement Plant
Permit AC01-267311/PSD-FL-228
VOC Emission Measurements

Dear Mr. Kirts:

As I discussed with Mr. Rick Banks of your office and Mr. Lalit Lalwani of the FDEP Northeast District Branch Office in Gainesville on Friday, September 22, 2000, compliance testing for volatile organic compounds (VOCs) was conducted at Florida Rock Industries Thompson S. Baker Cement Plant on Saturday, September 23, 2000. These compliance tests were the tests referenced in Kirby Green's letter to Segundo Fernandez dated September 20, 2000. The tests could not be conducted on or before September 22, 2000, as suggested in Mr. Green's letter, because of atypical plant operating conditions. The tests were conducted at the earliest date possible which was September 23, 2000. I would like to express our appreciation to you and your staff for allowing the compliance testing to proceed on a Saturday. As you are aware, this request was made only because of the urgency to demonstrate compliance with the permitted VOC emission limit at the earliest possible date.

I am providing you, at this time, with a summary of the results of the September 23, 2000, compliance testing. The average VOC emission rate was 7.33 pounds per hour compared with an allowable VOC emission rate of 10.74 pounds per hour at the clinker production rate at the time of testing of 89.5 tons per hour. The maximum permitted VOC emission rate is 11.55 pounds per hour.

Attachment 2

Mr. Chris Kirts
Florida Department of
Environmental Protection

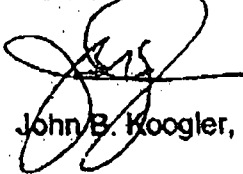
September 25, 2000
Page 2

The results of the three test runs are summarized in the attached table. The data show that the total hydrocarbon emission rate averaged 11.56 pounds per hour, the methane emission rate averaged 4.24 pounds per hour and the VOC emission rate (the difference between total hydrocarbons and methane) averaged 7.33 pounds per hour. During the compliance test period, the feed rate to the preheater averaged 140 tons per hour which is equivalent to a clinker production rate of 89.5 tons per hour. The permitted preheater feed rate and clinker production rate are 149.9 tons per hour and 95.8 tons per hour, respectively. The plant operated normally in the compound mode (both the kiln and raw mill operating) during the entire test period and 100 percent of the heat input to both the kiln and precalciner was provided by coal.

We will provide you with a complete test report as soon as possible. If there are any questions prior to receiving our report, please feel free to contact me at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:wa
Enc.

C: Mr. Kirby Green
Mr. Larry Morgan
Ms. Trina Vielhauer
Mr. Howard Rhodes, FDEP, Tallahassee
Mr. Al Linero, FDEP
Mr. Ernest Frey, FDEP, Jacksonville
Mr. Lalit Lalwani, FDEP, Gainesville
Mr. Fred Cohrs, FRI
Mr. Cary Cohrs, FRI
Mr. George Townsend, FRI
Mr. Segundo Fernandez



Mr. Chris Kirts
Florida Department of
Environmental Protection

September 25, 2000
Page 3

Run	Preheater Feed (tph)	Total Hydrocarbons (as propane) (lb/hr)	Methane (as methane) (lb/hr)	VOC (lb/hr)
1	140	11.16	4.18	6.98
2	140	11.44	4.05	7.39
3	140	12.09	4.48	7.61
Avg	140(1)	11.56	4.24	7.33(2)

- (1) Equivalent to 89.5 tph clinker
(2) Allowable VOC emission rate at 0.12 lb/ton clinker = 10.74 lb/hr

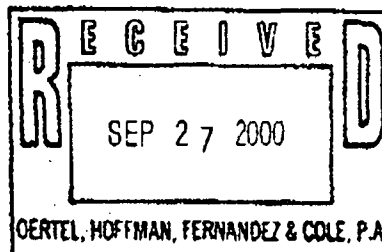


GENERAL OFFICE: 155 East ... Street / P.O. Box 4667 / Jacksonville, Florida 3220 ... (904) 355-1781
FLORIDA ROCK INDUSTRIES INC Mining, Ready Mix Concrete, and Construction Products

September 25, 2000



Mr. Chris Kirts
Florida Department of
Environmental Protection
7825 Baymeadows Way, Suite B-200
Jacksonville, FL 32256-7590



Dear Mr. Kirts:

Florida Rock Industries, Inc. has successfully completed its retest for VOC emissions at the Thompson S. Baker Cement Plant in Newberry on Saturday, September 23, 2000. The measured VOC emissions are below the permitted limit.

To accomplish this, the plant omitted the use of mill scale as one of its raw materials and commenced to produce only ASTM Type I cement. After the completion of the test the production of Type I was continued, without the use of any mill scale.

The compliance test report is being prepared by Koogler & Associates and will be completed in the next few days.

As we had correctly surmised, after substantial testing of all of our raw materials, the mill scale has been the major contributor to the formation of volatile organic matter. We worked diligently to identify the cause of the VOC emissions and took prompt actions to bring the emissions into compliance with our permit limits. Most mill scale available in this country contain amounts of hydrocarbons originating in lubricants used in the milling process.

In the meantime we located a limited supply of mill scale with low THC content and have received several truckloads of this material. The material comes from a steel plant which uses a flotation process to separate the spent grease from the steel flakes and attempts to make a THC-free mill scale. We are told the separated grease is being reused for lubrication. Representatives of Florida Rock are scheduled to visit the steel plant offering this material for a personal inspection of the cleaning process and its effectiveness. The samples we received of this material show a presence of only 0.04 % THC. This compares to values of as high as 1% in previously supplied mill scale. We hope to verify that this cleanliness can be reliably maintained and that the quantity of clean mill scale produced is sufficient for our needs. If the answers are affirmative, we will use the material to produce Type II cement to meet FDOT specifications. The difference in the THC contents leads us to believe that the permitted VOC limits will continue to be met.

Simultaneously we are in contact with the Oak Ridge National Laboratories in Oak Ridge, Tennessee to discuss a technical assistance agreement for the production of THC-free mill scale. Oak Ridge has done extensive research in bio-degradation of organic compounds for the Department of Energy and has developed notable expertise in the destruction of organic matter, turning it into harmless carbon dioxide and water molecules. Based on the success of this method, we would be able to tap a large supply of mill scale, which is now being used without prior treatment by most cement companies in this and other countries. The disadvantage of bio-

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Mr. Chris Kirts
September 25, 2000
Page 2 of 2

remediation is the time frame. Bio-remediation of organic matter may take as long as 14 months, leaving us unable to satisfy our requirement for clean material for some period of time, should the present promising source not prove to be reliable or sufficient.

It is possible that more steel mills will make the capital investments to clean up their mill scale and recycle the grease, which would make more material available to our industry. We will continue to search for additional sources.

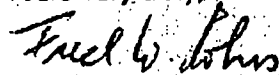
Another option to produce clean mill scale for our use is the construction of a mill scale pretreatment facility, which would be somewhat similar to a remediation plant for oil soaked soils, using asphalt driers with afterburners. Given the relatively small amount of mill scale consumed by our plant, pretreatment may be totally cost prohibitive. Our inquiries to existing soils remediation operators have not met with encouraging responses. At this time none of the facilities we have been able to contact are available to pretreat our mill scale.

On a related matter, you have pointed out in our meetings, that the Title V permit must reflect the planned TDF facility. The construction permit allows up to 30% replacement of coal with TDF, but so far the company has not installed a TDF system, nor used TDF in its operation. We have scheduled a visit to recently installed systems to determine if the latest technology satisfies our requirements and, at the same time find out how much iron addition can be expected from the ash contained in the tires. This source of iron may further help to reduce our mill scale requirements.

We are certain of a short-term solution toward meeting the VOC limits at the TSB Cement Plant, but should continue to discuss and explore all options with the department, which may include short-term relief for a long-term answer.

Your co-operation and assistance will be appreciated.

Yours very truly,



Fred W. Cohrs
Vice President

FWC/bc

Cc: Mr. Howard Rhodes
Mr. Al Linero
Mr. Ernie Frey
Mr. Kirby Green
Mr. John Baker
Segundo Fernandez, Esq.

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Voc File

CLIENT : Florida Rock Industries
ADDRESS: 4000 CR 235
Newberry, FL 32669

REPORT # : JAX13227
DATE SUBMITTED: September 15, 2000
DATE REPORTED : September 22, 2000

PAGE 1 OF 4

ATTENTION: Mr. Cary Cohrs

SAMPLE IDENTIFICATION

Samples submitted and
identified by client as:

PROJECT : FL. ROCK INDUST

09/15/00

- #1 - LEVAND STEEL
- #2 - BULK MATERIAL

PROJECT MANAGER

scott D. Martin

Attachment 4

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ENCO LABORATORIES
 REPORT # : JAX13227
 DATE REPORTED: September 22, 2000
 REFERENCE : FL. ROCK INDUST

PAGE 2 OF 4

RESULTS OF ANALYSIS

<u>MISCELLANEOUS</u>	<u>METHOD</u>	<u>LEVAND STEEL</u>	<u>BULK MATERIAL</u>	<u>Units</u>
Percent Solids	SM2540G	96	95	%
Date Analyzed		09/20/00	09/20/00	

<u>EPA METHOD FLPRO - PETROL. RESIDUAL ORG.</u>	<u>LEVAND STEEL</u>	<u>BULK MATERIAL</u>	<u>Units</u>
Hydrocarbons (C8-C40)	520	11000 D1	mg/Kg
Surrogate: o-Terphenyl	% RECOV 110	% RECOV *	LIMITS 51-148
Date Prepared	09/20/00	09/20/00	
Date Analyzed	09/22/00	09/22/00	

* = Surrogate recovery unavailable due to sample dilution.
 U = Compound was analyzed for but not detected to the level shown.
 D1 = Analyte value determined from a 1:10 dilution.

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ENCO LABORATORIES
 REPORT # : JAX13227
 DATE REPORTED: September 22, 2000
 REFERENCE : FL. ROCK INDUS.

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RESULTS OF ANALYSIS

EPA METHOD FLPRO -
PETROL. RESIDUAL ORG.

Hydrocarbons (C6-C60)

Surrogate:
 o-Terphenyl
 Date Prepared
 Date Analyzed

LAB BLANK

6.6 U

% RECOV
 103
 09/20/00
 09/21/00

Units

mg/kg

LIMITS
 51-148

U - Compound was analyzed for but not detected to the level shown.

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ENCO LABORATORIES

REPORT # : JAK13227
DATE REPORTED: September 22, 2000
REFERENCE : FL. ROCK INDUST

PAGE 4 OF 4

QUALITY CONTROL DATA

<u>Parameter</u>	<u>% RECOVERY</u> <u>MS/MSD/LCS</u>	<u>ACCEPT</u> <u>LIMITS</u>	<u>% RPD</u> <u>MS/MSD</u>	<u>ACCEPT</u> <u>LIMITS</u>
<u>PETROL. RESIDUAL ORG.</u> <u>Hydrocarbons (C8-C40)</u>	88/100/101	62-204	13	25

Environmental Conservation Laboratories Comprehensive QA Plan #910190

< = Less Than
MS = Matrix Spike
MSD = Matrix Spike Duplicate
LCS = Laboratory Control Standard
RPD = Relative Percent Difference

This report shall not be reproduced except in full, without the written approval of the laboratory. Results for these procedures apply only to the samples as submitted.