

Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

January 26, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No.: 0010087-003-AC/PSD-FL-228A
Thompson S. Baker (Newberry) Cement Plant

Dear Mr. Baker:


Enclosed is one copy of the Draft Air Construction Permit Modification for the Thompson S. Baker Cement Plant on County Road 235, in Newberry, Alachua County. The Department's Intent to Issue Air Construction Permit Modification and the "Public Notice of Intent to Issue Air Construction Permit Modification" are also included.

Please note, the Public Notice is a combined notice and addresses the Intent to Issue this permitting action and the Northeast District's DRAFT Title V Air Operation Permit simultaneously.

The "Public Notice" must be published one time only as soon as possible in a newspaper of general circulation in the area affected, pursuant to the requirements Chapter 50, Florida Statutes. Proof of Publication, i.e. newspaper affidavit, must be provided to the Department's Bureau of Air Regulation office within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in denial of the permit modification. The Department reserves the right to publish the Public Notice at anytime. If the Department publishes the Public Notice, the applicant is relieved of this responsibility.

Please submit any written comments you wish to have considered concerning the Department's proposed action to A.A. Linero, P.E. Administrator, New Source Review Section at the letterhead address or contact him at 850/921-9523.

Sincerely,


C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/al

Enclosures

"More Protection. Less Process"

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In the Matter of an
Application for Permit by:

Florida Rock Industries, Inc.
55 East 21st Street
Jacksonville, Florida 32206

DEP File No.: 0010087-003-AC/PSD-FL-228A
Extension and Modification of Construction Permit
Thompson S. Baker Cement Plant
Alachua County

INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

The Department of Environmental Protection (Department) gives notice of its intent to issue an air construction permit modification (copy of DRAFT Permit Modification attached) for the proposed action, detailed in the application specified above and the attached Draft Control Technology Review, for the reasons stated below.

The applicant, Florida Rock Industries (FRI), applied on July 18, 2000 to the Department to extend the expiration date of its current permit to construct the Thompson S. Baker Cement in Alachua County. FRI subsequently modified its request to include details related to achievement of a future nitrogen oxides emission limitation. The Department is also required by the existing permit to issue or revise emission limits for certain air pollutants after receipt of stack test results.

The Department has permitting jurisdiction under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The above actions are not exempt from permitting procedures. The Department has determined that an air construction permit modification is required to extend the expiration date of the permit and to include a final limit for sulfuric acid mist emissions.

The Department intends to issue this air construction permit based on the belief that the applicant has provided reasonable assurances to indicate that operation of these emission units will not adversely impact air quality, and the emission units will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C. In addition, the proposed modifications have been included in the Northeast District's DRAFT Title V Air Operation Permit; and, the Public Notice is a combined notice and addresses the Intent to Issue this proposed permitting action and the Northeast District's Title V Air Operation Permit simultaneously.

Pursuant to Section 403.815, F.S., and Rule 62-110.106(7)(a)1., F.A.C, you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Construction Permit Modification. The notice shall be published as soon as possible one time only in the legal advertisement section of a newspaper of general circulation in the area affected. Rule 62-110.106(7)(b), F.A.C., requires that the applicant cause the notice to be published as soon as possible after notification by the Department of its intended action. For the purpose of these rules, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed below. The applicant shall provide proof of publication to the Department's Bureau of Air Regulation, at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400 (Telephone: 850/488-0114; Fax 850/922-6979). You must provide proof of publication within seven days of publication, pursuant to Rule 62-110.106(5), F.A.C. No permitting action for which published notice is required shall be granted until proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051, F.S. to the office of the Department issuing the permit. Failure to publish the notice and provide proof of publication may result in denial of the permit pursuant to Rules 62-110.106(9) & (11), F.A.C.

The Department will issue the final permit modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed permit issuance action for a period of 30 (thirty) days from the date of publication of Public Notice of Intent to Issue Air Permit Modification. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit modification and require, if applicable, another Public Notice.

The Department will issue the permit modification with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Mediation is not available in this proceeding. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying

(implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Executed in Tallahassee, Florida.



C. H. Fancy, P.E., Chief
Bureau of Air Regulation

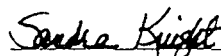
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION (including the PUBLIC NOTICE, Technical Evaluation and Preliminary Determination, and the DRAFT permit modification) was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 01-26-01 to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Gregg Worley, EPA
John Bunyak, NPS
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
W. Douglas Beason, Esq., DEP OGC
James J. Konish, Esq., FPLW*
Segundo J. Fernandez, Esq., OHF&C*
Arthur Saarinen*
Chair, Alachua County Commission*
Chris Bird, Alachua County EPD
Rob Luna, NCFGP*

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

01-26-01
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT
AND
PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

Florida Department of Environmental Protection

DRAFT Title V Air Operation Permit No.: 0010087-002-AV
Draft Air Construction Permit No.: 0010087-003-AC

Florida Rock Industries, Inc.
Thompson S. Baker Cement Plant - Newberry
Alachua County

The Florida Department of Environmental Protection gives notice of its intent to issue the initial Title V Air Operation Permit [Northeast District: permitting authority] and an Air Construction Permit Modification [Bureau of Air Regulation: permitting authority], simultaneously, to Florida Rock Industries, Inc. (FRI), for the Thompson S. Baker Cement Plant in Newberry located on County Road 235, 2.5 miles Northeast of Newberry, Alachua County. The applicant's name and address is: Mr. John D. Baker, Florida Rock Industries, Inc., 155 East 21st Street, Jacksonville, Florida 32206.

The modification's purpose is to extend the expiration date of the original air construction permit (AC01-267311/PSD-FL-228) for the facility, to set an emission limit for sulfuric acid mist as required by the original permit, to install some NO_x control equipment, and to require a new VOC continuous emission monitor. Another Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C., but it was necessary to set a limit for sulfuric acid mist pursuant to the existing permit.

The original permit was issued on December 23, 1996, with an initial expiration date of December 31, 1999. The plant first produced clinker on December 23, 1999. The permit required that FRI meet an initial nitrogen oxides (NO_x) emission limit of 3.8 pounds per ton of clinker (lb/ton) and a subsequent limit of 2.8 lb NO_x/ton of clinker two years after startup. In accordance with the permit, "FRI will install any additional control equipment during the two year optimization period to insure compliance with the NO_x limit of 2.8 lb/ton clinker by the end of the period." To reliably accomplish this end, FRI will install equipment to convert the precalciner to a Low NO_x Multi-Stage Calciner (MSC). Compliance with the NO_x limit will be confirmed by the continuous emission monitoring system (CEMS) by December 31, 2001. The permit will be extended until March 31, 2001, for replacement or addition of continuous emission monitoring equipment and conversion of the precalciner to a Low NO_x Multi-Stage Calciner (MSC) to meet the lower nitrogen oxides emission limit as described in Table II of the original permit.

The Northeast District will issue the PROPOSED Title V Air Operation Permit, and subsequent FINAL Title V Air Operation Permit, in accordance with the conditions of the DRAFT Title V Air Operation Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. Also, the Bureau of Air Regulation will issue the Final Air Construction Permit Modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. These permits will be issued simultaneously in accordance with the Title V Air Operation Permit permitting timeframes.

The permitting authority will accept written comments concerning the DRAFT Title V Air Operation Permit and Draft Air Construction Permit Modification issuance actions for a period of 30 (thirty) days from the date of publication of this Notice. For the DRAFT Title V Air Operation Permit, written comments should be provided to the Department of Environmental Protection, 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in this DRAFT Title V

Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice. For the Draft Air Construction Permit Modification, written comments should be provided to the Department's Bureau of Air Regulation, 2600 Blair Stone Road, Mail Station #5505, Tallahassee, Florida 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed Draft Air Construction Permit Modification, the permitting authority shall issue a Revised Draft Air Construction Permit Modification and require, if applicable, another Public Notice.

The permitting authorities will issue the permits simultaneously with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000 (Telephone: (904) 488-9730, Fax: (904) 487-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-5.207 of the Florida Administrative Code.

A petition that disputes the material facts on which the permitting authority's action is based must contain the following information:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name, address and telephone number of the petitioner; name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how petitioner's substantial rights will be affected by the agency determination;

(c) A statement of how and when the petitioner received notice of the agency action or proposed action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so state;

(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle petitioner to relief; and

(f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the permitting authority's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available for this proceeding.

In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7661d(b)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period as established at 42 U.S.C. Section 7661d(b)(1), to object to issuance of any permit. Any petition shall be based only on objections to the permit that were raised with reasonable specificity during the 30 (thirty) day public comment period provided in this

notice, unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period or unless the grounds for such objection arose after the comment period. Filing of a petition with the Administrator of the EPA does not stay the effective date of any permit properly issued pursuant to the provisions of Chapter 62-213, F.A.C. Petitions filed with the Administrator of EPA must meet the requirements of 42 U.S.C. Section 7661d(b)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 M Street, S.W., Washington, D.C. 20460.

For the proposed Title V Air Operation Permit, a complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590
Telephone: (904) 448-4310
Fax: (904) 448-4363

Dept. of Environmental Protection
Northeast District Branch Office
101 Northwest 75th Street, Suite 3
Gainesville, Florida 32607
Telephone: (352) 333-2850
Fax: (352) 333-2856

The complete project file includes the DRAFT Title V Air Operation Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Christopher L. Kirts, P.E., at the above address, or call (904) 448-4310, for additional information.

For the proposed Air Construction Permit Modification, a complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection
Bureau of Air Regulation
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida, 32301
Telephone: (850) 488-0114
Fax: (850) 922-6979

Dept. of Environmental Protection
Northeast District Office
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590
Telephone: (904) 448-4310
Fax: (904) 448-4363

Dept. of Environmental Protection
Northeast District Branch Office
101 Northwest 75th Street, Suite 3
Gainesville, Florida 32607
Telephone: (352) 333-2850
Fax: (352) 333-2856

The complete project file includes the application, technical evaluations, Draft Air Construction Permit Modification, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Resource Review Section at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information. Technical evaluations and other related documents for the proposed action can be viewed at www.dep.state.fl.us/air/permitting by clicking on Utility and Other Permits and finding Florida Rock Newberry files.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

Florida Rock Industries, Inc. Thompson S. Baker Cement Plant

Florida Rock Industries, Inc. (FRI), owns and operates the Thompson S. Baker Cement Plant in Newberry, Alachua County. The original project resulted in "significant emissions" of various pollutants with respect to Table 62-212.400-2, Florida Administrative Code (F.A.C.). The project was subjected to a review for the Prevention of Significant Deterioration (PSD) and a determination of Best Available Control Technology (BACT) in accordance with Rule 62-212.400, F.A.C.

The limits, including some interim limits, were included in the permit issued on December 23, 1996. In accordance with the permit, the interim limits must ultimately be reviewed and possibly revised. Certain other limits were not issued at the time must still be proposed. The permit provides for setting, reviewing, or finalizing those limits following receipt from FRI of stack test and continuous emission monitoring data (as applicable). These pollutants include nitrogen oxides (NO_x), sulfur dioxide (SO₂), sulfuric acid mist (SAM) and beryllium (Be).

NO_x Control. The original permit was issued on December 23, 1996 with an initial expiration date of December 31, 1999. The plant first produced clinker on December 23, 1999. The permit required that FRI meet an initial nitrogen oxides (NO_x) emission limit of 3.8 pounds per ton of clinker (lb/ton) and a subsequent limit of 2.8 lb NO_x/ton two years after startup (i.e. December, 2001).

According to FRI, present NO_x emissions are in the 3.5 lb/ton range on a 30-day rolling average. FRI believes that it cannot meet the 2.8 lb/ton limit on a continuous basis without modification to the preheater configuration.¹ In accordance with the permit, "FRI will install any additional control equipment during the two year optimization period to insure compliance with the NO_x limit of 2.8 lb/ton clinker by the end of the period."² Thus FRI in a meeting with Department representatives on December 15, 2000 stated a desire to have the construction permit modified to install a Low NO_x Multi-Stage Calciner (MSC).

Devices such as the MSC proposed by FRI were under development when the permit was issued. They are clearly compatible and consistent with the Department's determination of Best Available Control Technology (BACT) issued concurrently with the referenced permit. The BACT was "Process Control and Secondary Combustion of Fuel" with an alternative of selective non-catalytic combustion (SNCR) to achieve (after two years) 2.8 lb NO_x/ton of clinker. The BACT states "FRI is required to supply additional technology to reduce NO_x emissions if the plant does not comply with the emissions limit within two years."³ The principle of the MSC according to its manufacturer, Polysius, is as follows:⁴



"The PREPOL[®]-MSC (Multi Stage Combustion) calciner system is being installed more frequently in cement plants, largely, because of increasingly stringent environmental protection regulations. The MSC process reduces emissions at no extra operating costs by staggered introduction of fuel, tertiary air, and raw meal. This causes the combustion to take place in several stages. In the first stage, the nitrogen oxides generated in the sintering zone of the rotary kiln are reduced by the presence of a burner in the kiln inlet. The fuel is injected against the direction of flow of the kiln gases and is pyrolysed in its gas phase. In the reducing atmosphere that is formed, the nitrogen oxides are converted into nitrogen that is not harmful to the environment.

In order to prevent new NO_x from being generated in the calciner, the calcining fuel also has to be burned under reducing conditions. This is achieved by staggered introduction of combustion air such that the fuel is first burned under reducing conditions, then under oxidizing conditions. This minimizes the generation of new NO_x in the calciner and further reduces the nitrogen oxides coming from the rotary kiln. Also, corresponding staggering of the raw meal infeed favorably influences the temperature in the

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

reducing zone of the calciner. Operating results obtained with the multi stage combustion process prove that basic NO_x emissions is reduced by up to 50%.”

An evaluation of the system described above was given in a report prepared by Schreiber, Yonley, & Associates for Alachua County.⁵ According to the report, “the Newberry plant, on the other hand, has the advantage of an inherently low-NO_x design.” “The plant does have the option of adding staged combustion as a NO_x contingency control. This method introduces fuel at the feed end of the kiln or at the precalciner vessel, creating a strongly reducing environment in which more NO_x is destroyed. The technology is used in both new construction and kiln retrofits. The Portland Cement Association Report on NO_x formation and Variability in Portland Cement Kiln Systems, Potential Control Techniques and Their Feasibility and Cost Effectiveness published in December 1998 reports that industry feedback indicated NO_x reduction potential with this control is 30 to 40 percent compared to conventional precalciner kilns.”

The Department does not necessarily agree with all aspects of the Schreiber analysis, but does agree on the discussion regarding staged combustion. The full report may be viewed at the Alachua County website.⁶

FRI proposes to use tires with propane backup as fuel burned under reducing conditions in the lower section of the MSC. Coal will be burned under subsequent oxidizing conditions in the higher section of the MSC. Additional tertiary air from the clinker cooler will insure good burnout and conversion of most CO to CO₂ without significant NO_x formation.

Compliance with the NO_x limit by December 31, 2001 will be confirmed by the continuous emission monitoring system (CEMS). The permit will be extended until March 31, 2002 to allow conversion of the precalciner, conduct additional fine-tuning, and provide the Department and FRI with time to review the results. This review may allow the Department to exercise the condition in Table II of the permit to “revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on compliance test and continuous emissions monitoring data.”

SO₂ Control. The interim SO₂ emission limit is 0.28 lb/ton or 28.8 lb/hr. The Department is required to issue the final SO₂ limits within 120 days following receipt of all test results required by this permit. An initial stack test conducted on the kiln indicated an emission rate of 1.4 lb/hr. This is an extremely low value. For example, kilns in certain parts of the country emit SO₂ at levels from 100 to 1000 times greater than indicated by the first FRI tests. Fortunately raw materials in Florida, such as the limestone, contain little iron pyrites that contribute to SO₂ formation. Early indications are that the kiln does indeed function as described in the original BACT determination. The sulfur is being removed in the alkaline environment of the kiln, preheater, and raw mill and ultimately incorporated into the clinker.

The single stack test results are not sufficient to set a final limit for SO₂. In fact, at the emission rate achieved to-date, the plant would not have been subject to a BACT-based SO₂ emission limit. The Department will wait until the applicant has submitted three months worth of CEMS data for this pollutant prior to revising the BACT limit for SO₂. The Department has reasonable assurance that the kiln is operating well within its interim permitted SO₂ limits.

Sulfuric Acid Mist Control.

FRI submitted stack test results for sulfuric acid mist (SAM). The tests indicated an emission rate of 0.00003 lb/ton of clinker or 0.0003 lb/hr. This equates to annual emissions of 0.0012 tons per year (TPY), which is much less than the threshold of 7 TPY normally requiring a BACT determination. Nevertheless the permit requires a limit.

The Department reviewed data from the EPA RACT/BACT/LAER Clearinghouse. The facilities include Tarmac (Miami), Florida Crushed Stone (Brooksville), Roanoke (Virginia), and Puerto Rican Cement. BACT-based emission limits ranged from 0.014 to 0.234 lb/ton of clinker. The Department will set a limit

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

of 0.0025 lb/ton of clinker, which is equal to 0.25 lb/hr and 1 TPY. This is the lowest SAM emission limit to-date.

There is no CEM requirement for SAM. The SO₂ emissions are measured by a CEM and will act as a surrogate for SAM. Based on a rule of thumb that emissions of SAM are typically 1 percent of SO₂ emissions, there is reasonable assurance that the SAM limit will be achieved if the SO₂ limit is achieved. Also, based on the extremely low emission rate and the chemistry of the process, the Department has reasonable assurance that the kiln as presently operated will easily and continuously comply with the limit proposed by the Department.

Beryllium Control. At the time the permit was issued (December 1996), beryllium was a pollutant subject to the Department's PSD rules. The Department determined that "small quantities of beryllium are generated by the combustion of coal in the kiln and calciner burner, and by combustion of No. 2 fuel oil in the raw mill auxiliary air heater. Beryllium will be generated as a particulate emission from the combustion of fuels, and will be controlled by the ESP on the kiln." Due to lack of emissions data regarding beryllium, the Department did not set a numerical emission limit "as controlled by PM BACT (ESP)." According to Table II of the original permit and BACT determination, the beryllium limit is "to be determined by future stack tests."

At the request of the Florida Coordinating Group, the Department in 1997-98,⁷ delisted asbestos, beryllium, and vinyl chloride as PSD pollutants consistent with EPA Headquarters guidance.⁸ Pollutants such as beryllium are now subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) pursuant to Section 112 of the Clean Air Act.

EPA reviewed the need for control of HAPs from the cement industry and Maximum Achievable Control Technology (MACT) standards were promulgated 1999 as 40CFR63, Subpart LLL.⁹

The Department must still take action on the permit requirement to set a final limit for beryllium. The Department will review the details of Subpart LLL as applied to the FRI plant as well as test data collected by EPA when it developed Subpart LLL. Additionally, the Department will require additional testing by FRI prior to taking action on a beryllium limit. The Department will publicly notice any action.

Permit Modifications. The Department proposes to extend the air construction permit until March 31, 2001. All physical construction required to make cement and to conduct initial testing are complete. The permit modification will authorize further work only for replacement or addition of continuous emission monitoring equipment and conversion of the precalciner to a Low NO_x MSC to meet the lower nitrogen oxides emission limit as described in Table II of the original permit.

Additional permit revisions to implement the modifications and provide reasonable assurance of compliance with emission limits for volatile organic compounds (VOC) are proposed. The changes are shown in the Draft Permit Modification accompanying this evaluation.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

REFERENCES

- ¹ Report. FRI. Pyroprocessing System Conversion Plan to Reduce NO_x to Permitted Limit. December 15, 2000.
- ² Permit. FDEP. Air Construction Permit No. AC01-267311 (PSD-FL-228). Florida Rock Industries Cement Plant in Newberry, Alachua County. December 23, 1996.
- ³ Report. FDEP. Best Available control Technology (BACT) Determination – Portland Cement Facility. Florida Rock Industries, Alachua County. Page 10. December 23, 1996.
- ⁴ Polysius Website. www.polysius.com Cement Pyroprocessing PREPOL^R-MSC.
- ⁵ Letter Report. R. J. Schreiber, P.E., QEP, Schreiber, Yonley, and Associates to J. J. Mousa, PhD., Alachua County DEP. Evaluation of Cement Plant Air Pollution Control Technologies (for the FRI Newberry Plant). July 28, 1999.
- ⁶ Alachua County Website. www.co.alachua.fl.us/cement Report on Cement Kiln Control Technology.
- ⁷ Minutes. Environmental Regulation Commission Meeting. Tallahassee. December 4, 1997.
- ⁸ Memorandum. Seitz, J. S., EPA OAQPS to EPA Regions. “New Source Review Transitional Guidance.” March 11, 1991.
- ⁹ Regulation. United States Environmental Protection Agency. National Emission Standards for Hazardous Air Pollutants, Cement Industry. 40CFR60, Subpart LLL, adopted by reference in Rule 62-204.800, F.A.C.

Month day, year

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No. 0010087-003-AC (PSD-FL-228A)
Newberry Cement Plant – Permit Modification

Dear Mr. Baker:

The Department reviewed your request dated July 17, 2000 and the additional information submitted July 25, December 15 and January 17 to extend and modify the referenced construction permit.

The existing permit also requires that the Department set certain emission limits based on test data. The Department has received sufficient data to set the final sulfuric acid mist limit, but does not yet have sufficient data to set final sulfur dioxide and beryllium limits.

The existing permit is hereby modified as follows:

EXPIRATION DATE

The expiration date is hereby extended until March 31, 2001. All physical construction required to make cement and to conduct initial testing is complete. This permit modification authorizes further work only for replacement or addition of continuous emission monitoring equipment and conversion of the precalciner to a Low NO_x Multi-Stage Calciner (MSC) to meet the lower nitrogen oxides emission limit as described in Table II of the original permit.

All additional construction related to installation of the MSC and short-term compliance testing for NO_x shall be completed by December 31, 2001. All compliance testing related to operation of the MSC to determine final long-term NO_x emission limits shall be completed by March 31, 2002.

SPECIFIC CONDITION 4 (First Paragraph)

Fuels fired in the pyroprocessing system (kiln and calciner) shall not exceed a total maximum heat input of 364 MMBtu/hr and shall consist only of coal, (usage rate shall not exceed 14.0 TPH), whole tires, propane, and unused No. 2 fuel oil which may also be fired in the Raw Mill Air Heater. Propane usage is limited to startup and in lieu of tires in the first stage of the MSC. All fuel usage shall be in compliance with the following limits and conditions: [Rule 62-210.200(225), F.A.C.]

SPECIFIC CONDITION 6 (Modified)

With respect to conducting manual stack tests, the relevant language in Specific Condition 6 is modified as follows:

The manual stack tests shall be conducted while firing both primary fuels at permitted capacity (70 to 100% coal and 0 to 30% tires) and while all continuous monitoring systems are functioning properly, and with all process units operating at their permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the units may be tested at less than 90% of the maximum operating rate allowed by the permit. In this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the units are so limited, then operation at higher capacities (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. [Rule 62-297.310(2)(b), F.A.C.]

If the kiln is tested while firing less than 30% tires, subsequent operation is limited to the percentage of tires burned during the test. Once the kiln is so limited, then operation at greater tire burning rates (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. Operation at greater tire burning rates (with prior notification provided to the Department) is also allowed for no more than 45 consecutive days in conjunction with installation and testing of the MSC. [Rule 62-297.310(2)(b), F.A.C.]

SPECIFIC CONDITION 6, TABLE II (Modified)

The final H₂SO₄ emission limit has been determined and is shown in Revised Table II (attached).

The final date for compliance with the lower NO_x limit of 2.8 pounds per ton of clinker has been set and is shown in Revised Table II.

SPECIFIC CONDITION 6.a. (New)

Permittee shall install, calibrate, maintain and operate a continuous emission monitoring system in the kiln/raw mill stack to measure and record the emissions of VOC from the kiln/raw mill. The CEM system shall be installed, certified, operated and maintained in accordance with Performance Specification 8A of Appendix B of 40 CFR 60. The CEM system shall include an oxygen monitor, which shall be installed, certified, operated and maintained in accordance with Performance Specification 3 of Appendix B of 40 CFR 60. The CEM system's data shall be quality assured using the procedures of Appendix F of 40 CFR 60. The owner or operator shall report no later than the 10th day following each calendar quarter a summary of the daily average VOC emissions reported by the CEMS system for the days of that calendar quarter to the Department's Northeast District Office. These results should be reported as ppm of propane corrected to 7 percent oxygen, pounds per hour of VOC as propane, and pounds of VOC as propane per ton of clinker. [Rule 62-4.070, F.A.C.]

SPECIFIC CONDITION 6.b. (New)

Permittee shall conduct quarterly beryllium tests on emissions from the kiln/raw mill stack by March 31, June 30, September 30, and December 31, 2001 using the methods described in Specific Condition 6. Test reports shall be submitted to the Department's Northeast District Office and the Bureau of Air Regulation in Tallahassee within 30 days after conducting the tests. [Rules 62-212.400 and 62-4.070, F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000,

and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Gregg Worley, EPA
John Bunyak, NPS
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
Chris Bird, Alachua County EPD
W. Douglas Beason, Esq., DEP OGC
James J. Konish, Esq., FPLW*
Segundo J. Fernandez, Esq., OHF&C*
Arthur Saarinen*
Chair, Alachua County Commission*
Rob Luna, NCFGP*

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

(Clerk)

(Date)

Revised Table II
Allowable Emissions
Florida Rock Industries

Pollutant	Bact Emission Limit		Emission Rate *		Basis
	lb/ton clinker	lb/ton dry feed	lb/hr	ton/yr	
PM (kiln)	0.31	0.20	30.00	110.50	BACT
PM ₁₀ (kiln)	0.26	0.17	25.50	93.93	BACT
PM (cooler)	0.16	0.10	14.99	55.70	BACT-NSPS
PM ₁₀ (cooler)	0.13	0.09	12.71	47.34	BACT
SO ₂ (kiln)*	0.28	0.18	28.82	108.55	BACT
NO _x (kiln)**	2.80	1.80	268.30	1018.00	BACT
H ₂ SO ₄ (kiln)	0.0025	0.0016	0.25	1	BACT
CO (kiln)	3.60	2.30	346.38	1288.60	BACT
VOC (kiln)	0.12	0.08	11.55	42.90	BACT
Beryllium	TO BE DETERMINED BY FUTURE STACK TESTS				BACT

Notes:

- * The kiln emission rate includes fuel oil combustion emissions from the raw mill air heater.
- ** ~~During the first two years~~ After startup and until December 30, 2001, the kiln shall not exceed a NO_x limit of 3.8 lb/ton clinker and 2.8 lb/ton clinker thereafter. The Department may revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on compliance test and continuous emission monitoring data to be submitted by March 31, 2001.
- + The Department may revise the SO₂ limit to less than 0.28 lb/ton clinker based on compliance test and continuous monitoring data.

RECEIVED

APR 30 2002



April 20, 2002

BUREAU OF AIR REGULATION

Mr. Al Linero, P.E.

Bureau of Air Regulation

Department of Environmental Protection

State of Florida

Marjory Stoneman Douglas Building

3900 Commonwealth Boulevard

Tallahassee, Florida 32399-3000

**For discussion with Al Linero
and staff only**

Re: Thompson S. Baker Cement Plant - Production and Emission Issues

Dear Mr. Linero:

Over the course of the last two years, we have brought to your attention various aberrations with respect to several of the units of measure, which found their way into the construction permit and subsequently into the Title V Operating Permit for subject plant. As the Title V permit language allows for certain modifications of some emission limits and as the Department is presently reviewing the final values applicable to this installation, we believe the opportunity should not be missed to deal with the inconsistencies in the body of the permit.

We request that the Department make certain changes to production rates and permitted emission limits, which more realistically portray the expectations and capabilities of the applicant/permit holder. We concur with the Department that plant operating experiences to date can lead to the reduction of some permitted emission limits of certain hazardous pollutants, primarily those addressed in Mr. Fancy's letter dated March 22, 2002, of which NO_x is the most significant one.

We have provided the data and information requested in Mr. Fancy's letter and would like to make the following observations:

The TSB Cement Plant received its Title V Permit on January 1, 2002. Prior to its issuance the plant operated successfully under construction permit No.001087003AC-FL-228A. Separate reports for the operating periods comprising the 2nd half of 2001 and the 1st Quarter of 2002 are deemed to be representative of the operating conditions. The plant operated in compliance with the permit conditions.

In writing the construction and operating permits, the applicant and the Department relied on the applicant's information received from qualified equipment vendors and professional engineers. The applicant made purchase decisions for manufacturing and emission control components based on the suppliers' credible warranties, visits to existing installations and conservative performance ratings. These values were reflected in the application for an air emission permit.

As an important part of the project development, the applicant made financial projections to demonstrate the viability of this significant investment. Florida Rock prefers to be accurate or err on the conservative side. A critical component of the projection is the plant's ability to produce the amount of saleable material contained in the proforma.

Given the limits stated in the permit, the production goals can not be met without violating certain restrictions, which we believe were not intended to be imposed by the Department.

Therefore, we seek to modify certain values contained in the permit, to reflect the past operating experiences and gain necessary flexibility in the interpretation of the production limits consistent with the plant's optimum capabilities, while maintaining or reducing the permitted air emission limits.

In support of the justification for the proposed restated production limits, the following explanations should be pertinent:

- a) the preheater portion of the pyro processing system is greatly more efficient with respect to heat transfer and requires less fuel than was anticipated. At the permitted feed rate, the preheater under performs and does not operate under optimum conditions.
- b) the ratio of fuel metered to the preheater relative to the main burner at the discharge end of the rotary kiln is inconsistent with the conservative design of the pyro processing system.
- c) fuel consumption and potential emissions of pollutants expressed as pounds per unit produced are higher than permitted levels of production than they are at optimum production rates. As is the case with most mineral processing systems, maximum efficiency and lowest overall emission rates can only be established through operating experience.
- d) the permitted NO_x emission limit of 2.8 lbs/ton clinker was found to be achievable prior to the addition of the MSC system. Yet, the company proceeded with the installation of the MSC system at considerable capital cost and loss of production due to the required plant outage, to achieve further environmental benefits, including the ability to burn used vehicle tires.
- e) prior to Florida Rock's installation of the MSC system, the Department became aware of the potential benefits of an MSC system and issued a construction permit to Suwannee American for a plant substantially identical to the modified TSB plant, giving it significantly higher production limits with similar emission values compared to the TSB plant. The Department was confident, that the MSC system could achieve NO_x reductions while increasing production rates.
- f) the investment made by the applicant has also substantially reduced CO emissions. This reduction was not required as part of the permit conditions.

Consequently, Florida Rock requests that the Department recognize the experiences gained in the operation of the TSB plant and update its Title V permit to reflect the practical production parameters.

A. Proposed Amended Production Rates

1. The permit allows for 8,760 hours of plant operation, which computes to 839,208 tons clinker production per year at the permitted hourly rate of 95.8 tons, as opposed to the 712,500 tons clinker production limit contained in the permit. The revised annual production figure will be identical to the limit contained in the Suwannee American permit.
2. Limit the daily production rate to 2,705 tons clinker, which must be produced to allow for 15% maintenance shutdown time.
3. Limit the hourly production rate to 112.6 tons, which is derived by producing at the daily limit during a 24 hr period.
4. Compute the kiln feed rate limit, by adding the loss of ignition, the coal ash and the circulating dust load to the hourly permitted clinker production. The hourly ratio of feed to clinker is not constant and is a function of the circulating dust load, which is metered as part of the kiln feed.
5. The permit contains sufficiently high production limits for all other regulated main manufacturing units (i.e. the raw mill and the cement mill) to fully take advantage of the proposed amendments to the kiln production limits.

B. Proposed Amendments to the Air Emission Rates

In accordance with the proposed amended production rates, the significant pollutant limits will be adjusted with respect to hourly, daily and per unit values. The adjusted limits will not exceed the permitted values contained in the Title V permit on an annual basis and will further recognize the plant's ability to accept a meaningful reduction of other permitted emission limits.

1. NO_x - at the restated clinker production rate of 839,208 tons per year, the hourly maximum emission will be 292.8 lbs. The NO_x emission on a per ton basis will not exceed 2.8 lbs but may go as low as 2.6 lbs at the optimum production rate of 112.6 tons per hour, assuming the linearity of the curve established within the existing permit limits.
2. CO - for the emission of CO, the applicant will recognize a significant reduction, owing to its installation of the MSC system and will cut the permitted limit by 15% to 1,042.6 tons per year and 238 lbs per hour, compared with the existing limits of 1,228.6 tons per year and 346.8 lbs per hour respectively.

3. SO₂ - the sulfur dioxide limit is presently 108.55 tons per year. The applicant proposes to reduce this limit by 50%, resulting in the following adjusted limits:

Unit	Old limit	New limit
tons/year	108.55	54.28
lbs/hr	28.82	12.4

4. Particulate Matter - we are proposing to reduce the present limit of 110.5 ton/year by 10% to 99.45 tons.

5. Beryllium - the Department intends to delete this compound from its list of regulated pollutants

6. Sulfuric acid mist - the present limit of one (1) ton per year should be maintained to allow for changes in the fuel source.

C. Fuel Consumption

The permitted fuel consumption is based on operating the kiln 100% of the available hours in any one year and demonstrates the inconsistencies in the permit. The presently permitted coal consumption could produce nearly one (1) million tons clinker per year.

Fuel Type	Old limit	New limit	% Reduction
Coal, tons/year	122,640	110,000	18.5
tons/day	336	274	
tons/hour	14	11.4	
MMBtu/hour	364	296.4	
Fuel Oil (Raw Mill Heater)			
Gals/yr	2,486,000	1,000,000	59.8
Gals/hr	283.8	283.8	0.0 (1)
Gals/day	6,811	6811	

(1) The reduction is due to the frequency of usage and the lesser usage as drying fuel than was anticipated. The operation of the raw mill without the availability of exit kiln gas still requires the full amount of oil when the raw mill is operating during kiln shutdowns.

D. Rationale for Approval of the amended Production Limits

The requested changes are consistent with a number of Florida and federal economic and environmental policies and goals, in that they

Mr. Al Linero
4/24/2002
Page 5 of 5

- a) improve productivity (more output per man-hr worked)
- b) increase fuel efficiency. With increased production, the fixed energy losses are spread over a larger amount of production, thus reducing fuel consumption per unit produced.
- c) reduction in total permitted gaseous pollutants.
- d) make the individual emission limits consistent with the intent of the permit and consider necessary maintenance of production and emission control systems as an integral part of the permitted plant capacity
- e) the restated production limits will allow the applicant to realize the economic benefits expected when it embarked on the permitting process
- f) the proposed amendments have no negative impact on the total emissions provided by the Title V permit as issued. In fact, the applicant proposes several meaningful reductions in the permitted limits.

We would very much appreciate an opportunity to discuss these issues with you at your earliest convenience, to seek guidance for the preparation of a formal application to amend the permit.

With best regards

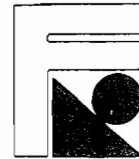


Fred W. Cohrs

Cc: Cary Cohrs
George Townsend

FLORIDA ROCK INDUSTRIES INC

CEMENT GROUP / 4000 N.W. CR 235 / P.O. Box 459 / Newberry, FL 32669 / (352) 472-4722



April 8, 2001

Mr. C. H. Fancy, P.E., Chief
Bureau of Air Regulation
Florida Department of
Environmental Regulation
Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

RECEIVED

APR 11 2002

BUREAU OF AIR REGULATION

Re: CEMS Data Summary - 30 Day Rolling Average NOx Emissions

Dear Mr. Fancy:

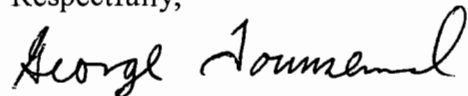
Enclosed, please find the CEMS data summaries requested in your letter dated March 22, 2002. The data summaries and graphs are for the months of July 1 through December 31, 2001 and January 1 through March 31, 2002. The 30-day rolling average NOx Lbs./Ton of clinker emissions, for each day of the month, are reflected in the attached graphs. The CEMS data-handling program has been configured to produce two pages of data, from the original one page report, relevant to the gaseous emissions. Daily reports of each day of the month requested show the clinker production, mass emissions rates, and mass emissions per ton of clinker produced on one page and the air flows, gaseous concentrations, and temperatures on the second page.

The 30-day rolling averages are calculated by averaging the thirty days of, data that includes the previous twenty nine (29) days, plus the data for day of the report, to produce the rolling average. Day thirty (30) of the data set is replaced, each day; with the data for the day of the report and day two becomes day one of the new data set. This process is repeated each day to eventually move day thirty up to day one and out of the data set as new data is added, to produce a true thirty-day rolling average. The rolling average is a standard a function of the CEMS software, by WTC Environmental Monitoring & Process Control. The functions to calculate emissions per ton of clinker were added to the program configuration at the request of Florida Rock. This was done after the input of clinker production was added to the CEM system. Initially the CEMS software only calculated the NOx Lbs./Ton of clinker emissions, SO2 and THC were added later. Before these functions were added to the CEMS data handling software the rolling average NOx Lbs./Ton of clinker was manually tracked and is still manually tracked to check/verify CEMS data (see attached). July through August 2001 indicates no data for SO2 and THC Lbs./Ton of clinker as they were added in late August. Some of the CEMS data was lost for the latter part of August and the first of September due to the crash of the CEMS computer hard drive. However, the data prior to this event was recovered from a CEMS data back-up disk, after the hard drive was replaced.

The mass emission data for many days in the data set requested data was edited to remove zeros or invalid data resulting from the kiln being down. These data inputs were set to monitoring not required "MNR" which prevents zeros or falsely low or high data from being incorporated into data averages. During periods when the kiln was down with no fuel being fired all mass emissions were set to MNR. When fuel was being fired with no feed the emissions per ton of clinker were set to MNR. However, when only fuel oil is fired, for heat-up, the mass emissions data will summarize extremely low mass emissions for all parameters, which will falsely lower the emission averages. The CEMS data would be much more representative of actual operating conditions if the data averaging functions for all mass emissions, Lbs./Hour and Lbs./Ton of clinker, were automatically set to MNR when the clinker production is less than thirty tons per hour. By design the kiln feed system cannot operate at a rate that produces less than thirty tons/hour of clinker. The data would still be available for review and/or inclusion in the data averaging as fuel-firing conditions dictated.

Should you require additional information or have any questions or comments concerning the data provided, please contact me at (352) 472-4722.

Respectfully,



George Townsend
Environmental & Safety Manager

pc: Cary O. Cohrs, Vice President - Operations

File: CEMS Data Summary.doc

RECEIVED

APR 11 2002

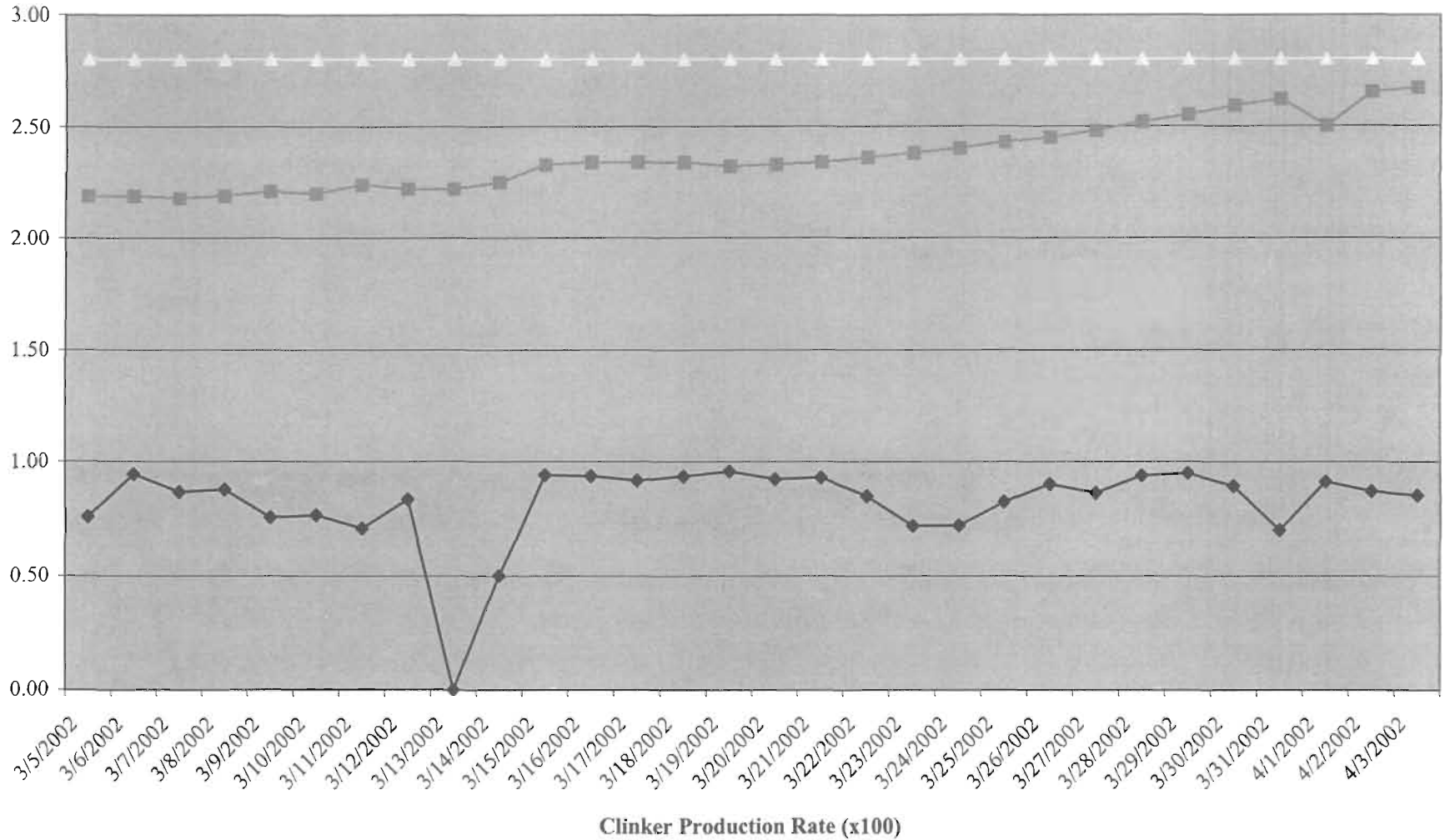
BUREAU OF AIR REGULATION

Kiln Stack NOx Emissions - Rolling Average Lb./Ton of Clinker Produced

Chart Day	Date	Maximun Permitted Rates		CEMS Daily Average NOx Emissions Lbs./Hour	CEMS Daily Average NOx Emission Lbs./Ton of Clinker	CEMS Report 30 Day Rolling Avg. NOx Emissions Lbs./Hour	CEMS Report 30 Day Rolling Avg. NOx Lbs./Ton of Clinker
		149.9 TPH	95.8 TPH				
		Calculated Daily Avg. Kiln Feed TPH	CEMS Average Clinker Production TPH				
30	3-Apr-02	149.63	85.29	218.93	2.48	214.78	2.67
29	2-Apr-02	152.84	87.12	233.95	2.63	213.45	2.65
28	1-Apr-02	160.04	91.22	250.64	2.77	212.08	2.50
27	31-Mar-02	123.42	70.35	214.05	3.04	208.23	2.62
26	30-Mar-02	156.70	89.32	247.91	2.78	206.41	2.59
25	29-Mar-02	166.54	94.93	282.16	2.97	203.33	2.55
24	28-Mar-02	164.72	93.89	279.29	2.97	198.28	2.52
23	27-Mar-02	151.51	86.36	253.18	2.93	195.34	2.48
22	26-Mar-02	158.16	90.15	236.29	2.63	192.96	2.45
21	25-Mar-02	144.72	82.49	214.24	2.83	191.02	2.43
20	24-Mar-02	127.00	72.39	180.98	2.77	188.27	2.40
19	23-Mar-02	126.72	72.23	194.51	2.69	186.51	2.38
18	22-Mar-02	149.25	85.07	229.29	2.71	185.93	2.36
17	21-Mar-02	163.32	93.09	214.60	2.32	184.55	2.34
16	20-Mar-02	161.93	92.30	240.92	2.67	184.15	2.33
15	19-Mar-02	167.79	95.64	235.53	2.47	177.16	2.32
14	18-Mar-02	164.07	93.52	249.36	2.67	176.43	2.34
13	17-Mar-02	160.89	91.71	244.67	2.67	175.54	2.34
12	16-Mar-02	164.26	93.63	243.10	2.59	173.74	2.34
11	15-Mar-02	165.19	94.16	255.37	2.73	172.28	2.33
10	14-Mar-02	88.00	50.16	143.97	3.09	173.43	2.25
9	13-Mar-02	0.00	0.00	0.00		173.75	2.22
8	12-Mar-02	146.89	83.73	202.75	2.41	175.55	2.22
7	11-Mar-02	124.82	71.15	148.70	2.84	172.19	2.24
6	10-Mar-02	134.91	76.90	176.92	2.30	175.35	2.20
5	9-Mar-02	133.16	75.90	189.75	2.50	173.97	2.21
4	8-Mar-02	154.12	87.85	225.56	2.58	174.03	2.19
3	7-Mar-02	152.42	86.88	225.56	2.44	175.56	2.18
2	6-Mar-02	165.68	94.44	193.08	2.05	141.38	2.19
1	5-Mar-02	133.61	76.16	165.37	2.11	141.85	2.19
					2.64		

pc: Cary Cohrs
Tom Messer

Rolling Average NOx Emissions - Lbs./Ton of Clinker



Clinker Production Rate (x100)
 CEMS 30 Day Avg. NOx Lbs./Ton of Clinker
 Permitted NOx Lbs./Ton of Clinker 30 Day Rolling Avg.



Jeb Bush
Governor

Department of Environmental Protection

Marjory Stoneman Douglas Building
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

David B. Struhs
Secretary

March 22, 2002

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. George Townsend
Environmental & Safety Manager
Florida Rock Industries
Post Office Box 459
Newberry Florida 32669

Re: CEMS Data – NO_x Emissions

Dear Mr. Townsend:

Thank you very much for setting up the plant tour on March 7 and the opportunity to discuss with Division staff the performance of the kiln since the installation of the new multi-stage calciner on the kiln. We received your March 11 letter that included revised graphs of nitrogen oxides (NO_x) emissions over the past year.

The graphs appear to reflect the 30-day averages for only a single day of each month. We had expected to receive instead the 30-day averages for each day of each month. The graphs we received with your March 11 letter were apparently developed excluding the data for days during which the kiln made no clinker. Please confirm that they also exclude the hours during which no clinker was made on days during which clinker was made. In the short term, we request resubmission of the graphs showing the day-by-day 30-day rolling averages.

Per Table II of the permit, “the Department may revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on continuous emissions monitoring data covering the period January 1-March 31, 2002 to be submitted by Florida Rock to the Department’s Northeast District by April 15, 2002.” Although the graphs provided show the general trend in emission rates over about a year’s time, we will need the detailed monitoring data to finalize the BACT limits as required by the construction permit.

In addition to the January 1 through March 31, 2002, data due on April 15, we request the data covering the period July 1 through December 31, 2001. These monitoring data should consist of each hourly average NO_x emission rate taken while fuel was fired in the kiln in units of lbs/hr and lbs/ton of clinker. This data set should also include the hourly clinker production rates (tons) and exhaust flow rates (actual cubic feet per hour). The calculated daily average emission rates of NO_x in lbs/ton of clinker for each day and the calculated 30-day rolling averages should also be included. Include example calculations showing how these averages are calculated.

“More Protection, Less Process”

Printed on recycled paper.

Mr. George Townsend
March 18, 2002
Page 2 of 2

Also include a discussion of the criteria used to exclude any emissions data due to startup, shut down, malfunction or no clinker production. We expect inclusion of emissions data in terms of lbs/hr of NO_x (but not lbs/ton clinker) during periods when fuel is fired in the kiln but there is no clinker production. Please submit these monitoring data in spreadsheet format if possible.

We recommend discussing the data requirements directly with our staff. If you have questions on this matter, please contact Greg DeAngelo at (850)921-9506 or Martin Costello at (850)921-9511.

Sincerely,



C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/mc

Cc: Cary Cohrs, FRI
Chris Kirts, DEP NED
Al Linero, DEP BAR

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

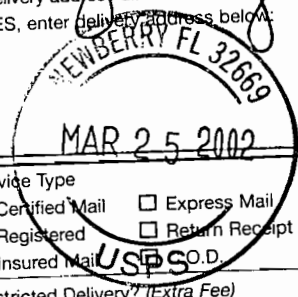
Mr. George Townsend
 Environmental & Safety Manager
 Florida Rock Industries
 Post Office Box 459
 Newberry, FL 32669

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **Becky Hurley** B. Date of Delivery

C. Signature *Becky Hurley* Agent Addressee

D. Is delivery address different from item 1? Yes No
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3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 9120

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
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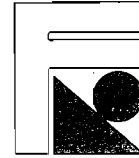
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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Sent To **George Townsend**
 Street, Apt. No.,
 or P.O. Box **459**
 City, State, ZIP+4
Newberry, FL 32669

FLORIDA ROCK INDUSTRIES INC

CEMENT GROUP / 4000 N.W. CR 235 / P.O. Box 459 / Newberry, FL 32669 / (352) 472-4722



March 11, 2002

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MAR 13 2002

BUREAU OF AIR REGULATION

Mr. Al Linero, P.E.
Administrator
Bureau of Air Regulations
New Source Review Section
Division of Air resource Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road MS 5510
Tallahassee, Florida 32399-2400

Re: CEMS Data - NOx Emissions

Dear Mr. Linero:

As per the request of Mr. Howard Rhodes, I have revised the NOx emissions data and the NOx Lb./Ton of clinker data for the months of May 2001 through February 2002. I revised the CEMS data, for the months indicated, to remove the days for which there was no production from the daily averages and resulting monthly averages. This data reflects a more accurate indication of the process NOx emissions. The production/down days were set to "monitoring not required" MNR in the CEMS data files; no data was removed or deleted, which precludes this data from inclusion in summary averages. After all corrections were made for the months indicated the NOx data summary, for each day containing periods of no production, was set for manual recalculation by the CEMS data handling system. Therefore, these corrections have been brought forward in the data handling system to reflect a current and corrected NOx emissions both Lbs./Ton and Lbs./Ton of Clinker. I have also contacted the CEMS software supplier and inquired about reconfiguring the CEMS software to automatically set the pollutant Lb./Ton of clinker to MNR when there is no production and this can and will be done, once a triggering input is decided upon. In the interim all emissions Lbs./Hr. and Lbs./Ton of clinker for periods of no production will be manually set to MNR and not included in the averaging period.

Should you have any question and/or comments concerning the above or require additional information, please contact me at (352) 472-4722.

Respectfully,

George Townsend
Environmental & Safety Manager

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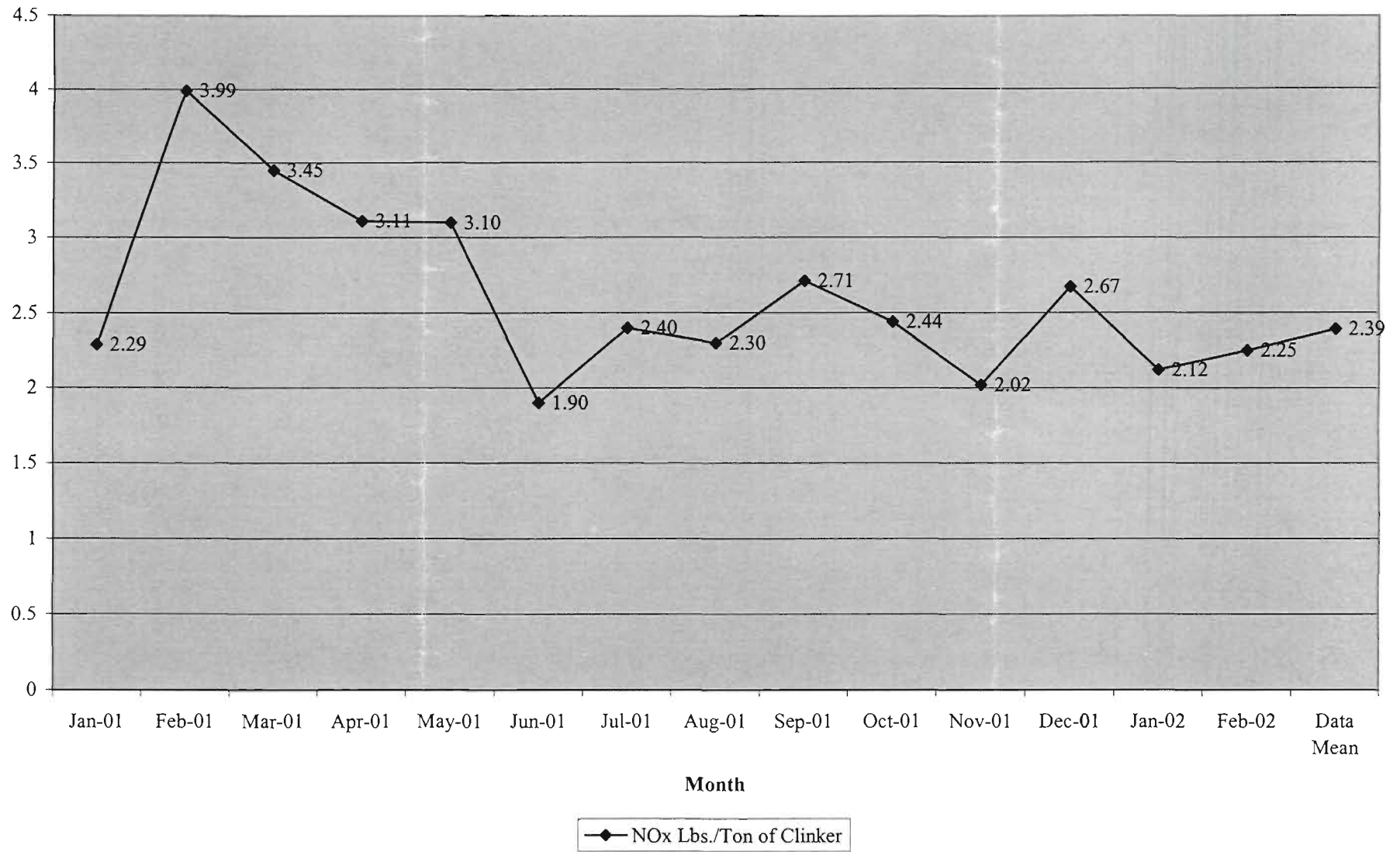
MAR 13 2002

BUREAU OF AIR REGULATION

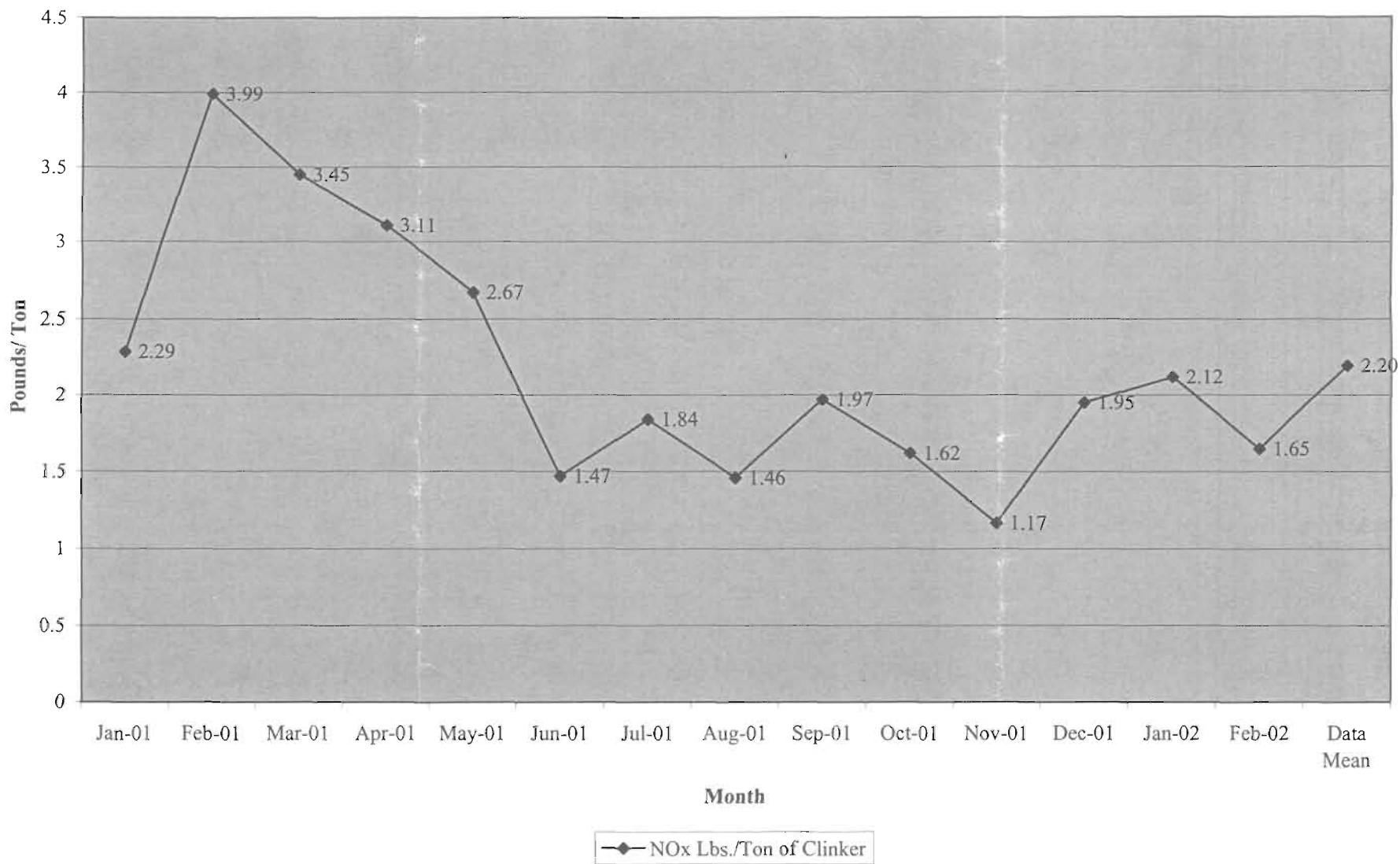
pc: Cary O. Cohrs, Vice President, Operations
Howard Rhodes, Director, FDEP DARM

File: AL.Linero-DEP.doc

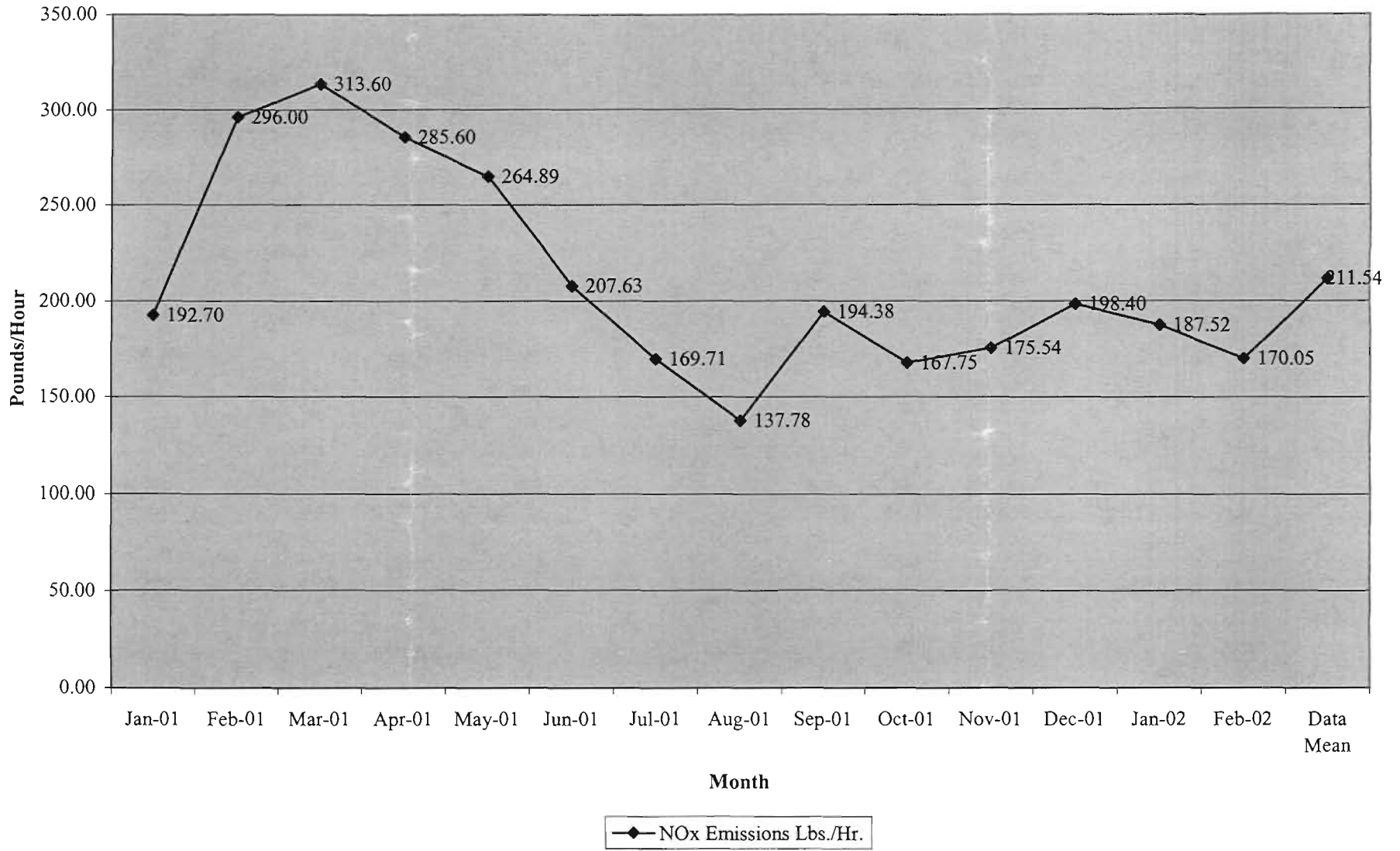
Revised Average Monthly NOx Emission Lbs./Ton of Clinker



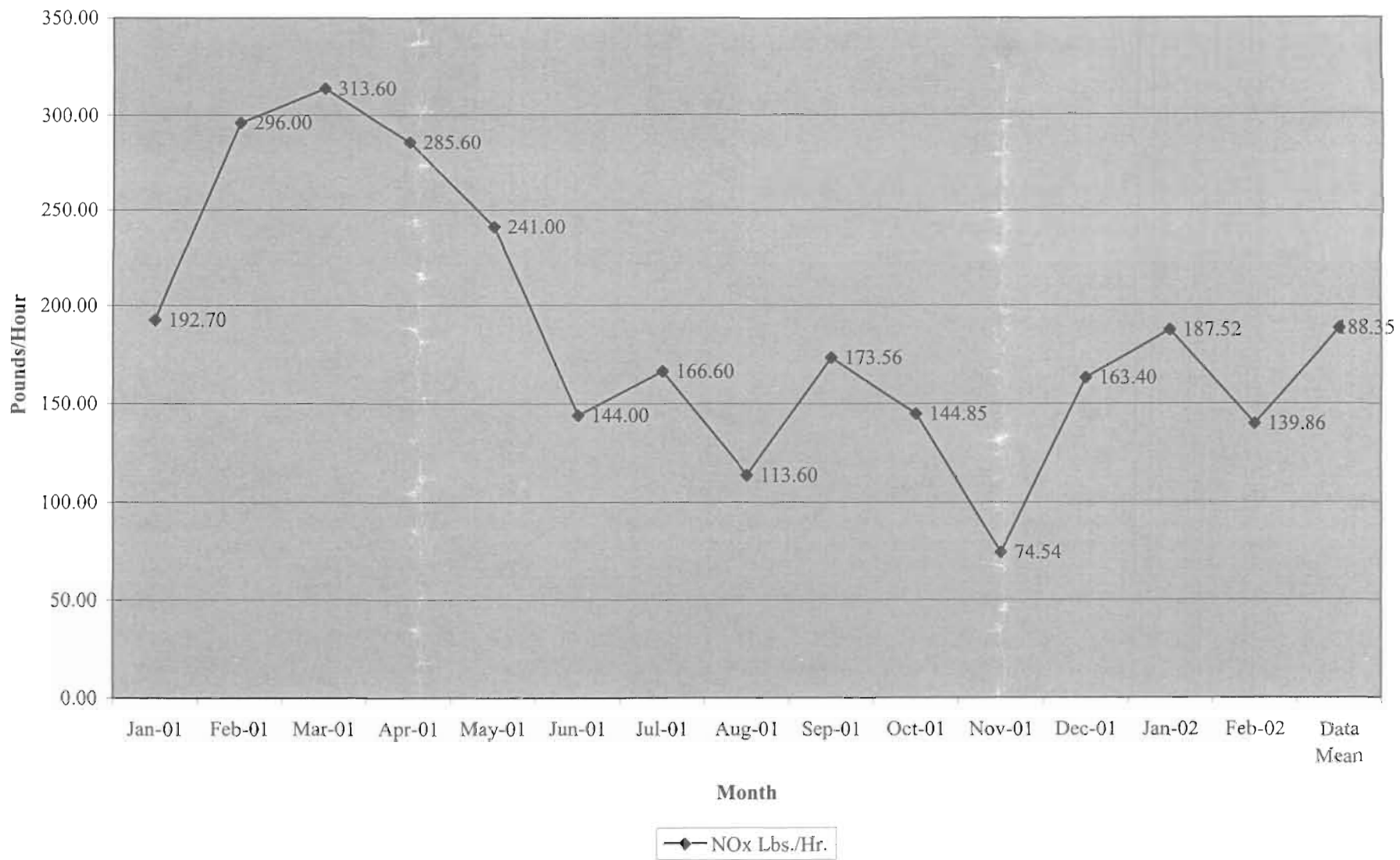
Average Monthly NOx Lbs./Ton of Clinker



Revised NOx Emissions Lbs./Hr.



Average Monthly NOx Emissions



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NOV 07 2001

BUREAU OF AIR REGULATION

TO Al Linero
From: Mort Benjamin
Date : November 5, 2001
Subject: Berylium Tests at Florida Rock Cement Plant -- Newberry

Four tests have been conducted at the Florida Rock Cement Plant at Newberry.

The results are:

Date	Pounds/Hour
7/00	0.000062
2/01	0.000046
6/01	0.000015
9/01	0.000081
Standard Deviation	0.0000279
Mean	0.000051

Enclosed are four test summaries for your review . The results are close enough to be a basis for an emission limit

COPY

BERYLLIUM
EMISSION MEASUREMENTS

KILN/RAW MILL

FLORIDA ROCK INDUSTRIES
THOMPSON S. BAKER CEMENT PLANT
NEWBERRY, FLORIDA

PERMIT NO. AC01-267311/PSD-FL-228

TEST DATE: July 24, 2000 (Corrected Data)
and
TEST DATE: February 6 & 7, 2001

REPORT DATE: March 14, 2001

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NOV -2 2001

KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW 13TH STREET
GAINESVILLE, FLORIDA
352-377-5822

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

original
187-00-09



1.0 INTRODUCTION

Florida Rock Industries owns and operates a 2300 ton per day (clinker) dry process precalciner Portland cement plant on CR 235, two miles north of the city center of Newberry, Florida. This report presents a correction of beryllium emission test data collected on July 24, 2000, previously reported to the Department, and beryllium emission test data collected on February 6 and 7, 2001.

On July 24, 2000, beryllium emission measurements were conducted and a beryllium emission rate of 0.062 pounds per hour was reported. As a result of this anomalously high emission rate, the Department required additional beryllium emission testing. The second set of emission measurements was conducted on February 6 and 7, 2001. These results, reported herein, showed a beryllium emission rate of 0.000046 pounds per hour; about 1000 times lower than the emission rate measured in July, 2000. As a result of the February, 2001 measurements, the laboratory that analyzed both sets of beryllium samples (Flowers Chemical Laboratories, Altamonte Springs, Florida) was asked to review both sets of analytical data. Flowers reported that the July, 2000 beryllium sample weights were erroneously reported as milligrams of sample rather than micrograms of sample (see Appendix). Correcting the July, 2000 beryllium sample weights results in a beryllium emission rate for the July, 2000 period of 0.000062 pounds per hour.

On February 6 & 7, 2001, Koogler & Associates Environmental Services of Gainesville, Florida, conducted a second set of beryllium emission measurements on the kiln/raw mill stack in accordance with EPA Test Method 104 (40 CFR 61, Appendix B). The purpose of the testing was to develop additional data to be used for establishing a beryllium emission limit for the plant, as required by Permit AC01-267311/PSD-FL-228.

The Northeast District Office of the Florida Department of Environmental Protection (FDEP) in Jacksonville, and the FDEP Northeast District Branch Office in Gainesville, Florida, were notified of the February, 2001 emission measurements and testing protocol.

During the February, 2001 test period, the kiln was operating at a preheater feed rate of 133.4 tons per hour. Permit AC01-267311 limits the preheater feed rate to 149.9 tons per hour, which corresponds to a clinker production rate of about 95.8 tons per hour.

The permit for the plant limits beryllium emissions from the kiln/raw mill to a rate established by Best Available Control Technology and specifies that the emission limit for this pollutant be established based on "future stack tests". The February, 2001 emission measurements reported herein represent the second set of emission

measurements on the plant for beryllium. The initial beryllium emission measurements were conducted on July 24, 2000.

The emissions from the kiln/raw mill are controlled by electrostatic precipitators (ESPs). The measured mass emission rate of beryllium averaged 0.000046 pounds per hour on February 6 and 7, 2001. The corrected beryllium emission rate measured on July 24, 2000 was 0.000062 pounds per hour. Statistically, (40 CFR 60, Appendix C) there is no difference in these emission rates.

3.0 FIELD AND ANALYTICAL PROCEDURES

Beryllium emission measurements were conducted using EPA Method 104. The sampling point locations for the Method 104 were established in accordance with EPA Method 1. Stack gas velocity measurements and stack gas moisture measurements were made in conjunction with the EPA Method 104 tests in accordance with EPA Methods 2 and 4. Measurements to determine the dry molecular weight of the stack gas were made in accordance with EPA Method 3. All EPA tests methods are described in 40 CFR 60, Appendix A or 40 CFR 61, Appendix B and have been adopted by reference by FDEP by Rule 62-297.401, F.A.C. There were no variations or exceptions to any of the referenced test methods.

4.0 SUMMARY OF RESULTS

The beryllium emission rate from the kiln/raw mill, measured on February 6 and 7, 2001, ranged from 0.000031 to 0.000056 pounds per hour and averaged 0.000046 pounds per hour. These data are summarized in Table 1. The stack gas flow rate from the kiln/raw mill during the beryllium tests averaged 126,299 dry standard cubic feet per minute (186,073 acfm), the stack gas temperature averaged 227°F and the stack gas moisture averaged 12.7 percent.

The corrected beryllium emission data from July 24, 2000 are summarized in Table 2. These data show beryllium emission rates ranging from 0.000009 to 0.000116 pounds per hour. Statistically, (40 CFR 60, Appendix, C), there is no difference between this emission rate and the beryllium emission rate measured on February 6 and 7, 2001.

These two sets of emission measurements provide a reasonable representation of beryllium emissions from the kiln/raw mill as required by Permit AC01-267311.

Calculations, field and analytical data sheets, plant operating information, equipment calibration sheets and a list of project participants are included in the Appendix of this report.

TABLE 1
SUMMARY OF BERYLLIUM EMISSION TEST DATA

Florida Rock Industries
Cement Kiln
February 6 & 7, 2001

Run No.	Process Weight Rate (Tons/hr)	Stack Gas Flow Rate (SCFMD)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Total Beryllium	
					Conc. (gr/dscf)	Emission Rate (Lbs/Hr)
1	120.2	134,728	225	12.6	4.88E-08	5.63E-05
2	140.0	129,656	229	13.0	2.76E-08	3.07E-05
3	140.0	114,513	227	12.6	5.04E-08	4.94E-05
Average	133.4	126,299	227	12.7	4.23E-08	4.55E-05

TABLE 2
SUMMARY OF CORRECTED BERYLLIUM EMISSION TEST DATA

Florida Rock Industries
Cement Kiln
July 24, 2000

Run No.	Process Weight Rate (Tons/hr)	Stack Gas Flow Rate (SCFMD)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Particulate Matter	
					Conc. (gr/dscf)	Emission Rate (Lbs/Hr)
1	135.0	93,275	246	17.0	7.65E-08	6.12E-05
2	140.0	98,460	248	16.0	1.38E-07	1.16E-04
3	140.0	129,779	200	15.9	8.30E-09	9.23E-06
Average	138.3	107,171	231	16.3	7.41E-08	6.22E-05

A. FIELD DATA SUMMARY

PLANT : Florida Rock Industries
Cement Kiln

DATE : February 6 & 7, 2001

	RUN 1	RUN 2	RUN 3
Vlc = Vol water collected in train, ml	351.0	357.0	297.0
Vm = Sample gas vol, meter cond., acf	112.335	109.382	97.454
Y = Meter calibration factor	1.0020	1.0020	1.0020
Pbar = Barometric pressure, in. Hg	30.28	30.30	30.30
Pstatic = Stack static pressure, in. H2O	-0.38	-0.36	-0.36
dH = Avg meter pressure diff, in. H2O	2.94	2.63	2.12
Tm = Absolute meter temp., degrees R	529.2	522.4	542.2
Vm(std) = Sample gas vol, Std. cond., dscf	114.474	112.894	96.801
Bws = Water vapor in gas stream, fraction	0.126	0.130	0.126
MF = Moisture factor (1 - Bws)	0.874	0.870	0.874
CO2 = Carbon Dioxide, dry, volume %	14.80	14.00	16.70
O2 = Oxygen, dry, volume %	13.60	12.20	10.10
N2 = Nitrogen, dry volume %	71.60	73.80	73.20
Md = Molecular weight of stack gas, dry	30.91	30.73	31.08
Ms = Molecular weight of stack gas, wet	29.28	29.08	29.43
Cp = Pitot tube coefficient	0.84	0.84	0.84
Sq.Rt. dP = Avg. square root of each dP	0.7629	0.7365	0.6509
Ts = Absolute stack temp., degrees R	684.5	688.8	686.9
A = Area of stack, ft2	68.42	68.42	68.42
Qstd = Volumetric flowrate, dscfm	134,728	129,656	114,513
An = Nozzle area, ft2	4.88E-04	4.88E-04	4.88E-04
0 = Sample time, minutes	120.00	120.00	120.00
%I = Isokinetic variation, percent	99.36	101.82	98.85

B. PARTICULATE DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln

DATE : February 6 & 7, 2001

1

	RUN 1	RUN 2	RUN 3
Sample Weight (FHW + MF + BHW), mg	0.00	0.00	0.00
Meter Volume, standard cond., Vm(std)	114.474	112.894	96.801
Carbon Dioxide, percent	14.80	14.00	16.70
Oxygen, percent	13.60	12.20	10.10
Sample Concentration :			
gr/scf	0.0000	0.0000	0.0000
gr/dscf	0.0000	0.0000	0.0000
gr/dscf @ 0 % CO2	0.0000	0.0000	0.0000
gr/dscf @ 0 % O2	0.0000	0.0000	0.0000
ppm * MW (dry gas).....	0.0	0.0	0.0
ppm * MW @ 0% CO2	0.0	0.0	0.0
ppm * MW @ 0% O2	0.0	0.0	0.0

FLOWERS


**CHEMICAL
LABORATORIES**
INCORPORATED

 Received From:
 Koogler Assoc.
 4014 NW 13th St.
 Gainsville, FL 32609

 Date Reported : Feb19 2001
 Project Number : 187-00-09
 PO Number : Fla. Rock Ind.
 FLDOH Number : E83018
 NYSDOH Number : 11595
 CTDPH Number : 0173
 NCDEHNR Number : 296
 SCDHEC Number : 96019

 For: Bomb Be
 Date Sampled: Feb 7 2001 Date Received: Feb12 2001 Lab Numbers: 32041-32048

REPORT OF ANALYSIS

	Beryllium
	mg
Accuracy:	77.8
Precision:	5.88
Det.Limit:	.00010
Client ID	
Lab Number	

RUN11	
32041	0.000347
RUN12	
32042	0.000115
RUN21	
32043	0.000200
RUN22	
32044	0.000102
RUN31	
32045	0.000317
RUN32	
32046	0.000106
BLK1	
32047	<0.000100
BLK2	
32048	0.000256

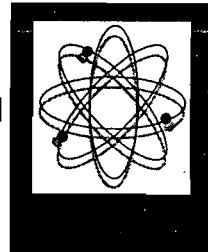
Certificate of Results

Sample integrity certified prior to analysis. Test results meet all requirements of the NELAC Standards, except as noted in the QA Report Section 4. This Report may not be reproduced in part, results relate only to items tested.

Serving Your Analytical and Environmental Needs Since 1957

Jefferson S. Flowers, Ph.D.
 President/Technical Director

Jefferson L. Flowers, Ph.D.
 Jefferson S. Flowers, Ph.D.
 481 NEWBURYPORT Av.
 ALTAMONTE SPRINGS
 FLORIDA 32715-0597
 BUS: (407) 339-5984
 FAX: (407) 260-6110

FLOWERS**CHEMICAL
LABORATORIES
INCORPORATED**

Received From:

Koogler Assoc.
4014 NW 13th St.
Gainesville, FL 32609

Date Reported : Feb19 2001
Project Number : 187-00-09
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NCDEHNR Number : 296
SCDHEC Number : 96019

For: Bomb Be

Date Sampled: Feb 7 2001 Date Received: Feb12 2001 Lab Numbers: 32041-32048

REPORT OF INFORMATION

Parameter	Unit	Limit	Expected	Value	Range	Correlation
					32041	
Beryllium	mg	0.625	0.0249	.00035		
					32042	
Beryllium	mg	0.625	0.0249	.00011		
					32043	
Beryllium	mg	0.625	0.0249	.00020		
					32044	
Beryllium	mg	0.625	0.0249	.00010		
					32045	
Beryllium	mg	0.625	0.0249	.00032		
					32046	
Beryllium	mg	0.625	0.0249	.00011		
					32047	

The above information is intended to highlight exceptional data as compared to the upper control limits (Limit) established for each of the parameters. Range exceedances are flagged by integer values in the Range column. The Expected values are derived from historical data. Expected is computed as either the mean or computed directly from another parameter using linear regression. All known correlation rule exceedances are listed as enumerated rule numbers in the Correlation column. Correlation pair rules are defined on the last page.

Florida Rock Industries, Inc.
Cement Group
Thompson S. Baker Cement plant

Process Weight Rate Sheet

Source: Kiln/Raw Mill Stack

Test Date: February 6 & 7, 2001

Permit No.: AC01-267311

Permitted Rate: 149.9 TPH

Test Parameter(s): Beryllium

Run No.	Run Times		Process Input Rate	
	Start	End	Rate	Unit
Run No. 1	1425 0753	1536 0850	120.17	TPH
Run No. 2	0906	1112	140	TPH
Run No. 3	1138	1346	140	TPH

I here by certify that to the best of my knowledge the above data is true and correct.

George Townsend
Name (Print)

George Townsend
Signature

February 8, 2001
Date

Environmental & Safety Manager
Title

Kiln/Calciner Coal Feed Rate

Beryllium Test

Test Date: February 6, 2001

February 7, 2001

Time	Dry Basis Coal Coal Feed Rate TPH		
	Kiln	Calciner	Total
<u>February 6, 2001</u>			
1400	1.6	2.4	4.0
1500	1.6	2.9	4.5
1600	2.0	3.7	5.7
		Avg.	4.0

Process Coal Feeder Rates (%)	
Kiln	Calciner
6.0	9.0
6.0	11.0
7.5	14.0

February 7, 2001

700	2.7	4.3	7.0
800	2.9	5.3	8.2
900	3.0	5.6	8.6
1000	2.5	5.2	7.7
1100	2.2	5.1	7.3
1200	2.3	4.8	7.1
1300	3.0	4.4	7.4
1400	2.4	4.3	6.7
		Avg.	7.7

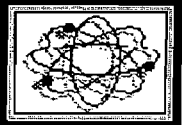
10.0	16.3
10.9	20.0
11.3	21.0
9.5	19.6
8.4	19.0
8.8	18.0
11.3	16.5
9.0	16.0

I here by certify that to the best of my knowledge the above data is true and correct.

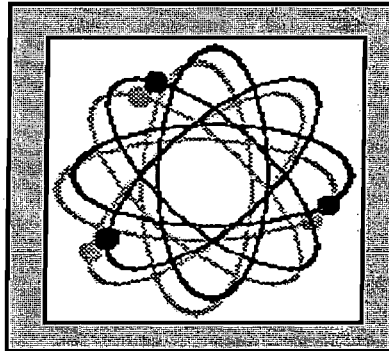
George Townsend
Name (Print)

George Townsend
Signature

CORRECTED LABORATORY REPORT



CHEMICAL
LABORATORIES
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Jefferson L. Flowers, Ph.D
Jefferson S. Flowers, Ph.D
481 NEWBURYPORT Av.
ALTAMONTE SPRINGS
FLORIDA 32715 - 0597
BUS: (407) 339-5984
FAX: (407) 260-6110

To: Koogler Assoc./Glenn
Date: Thu Feb 22 10:07:47 GMT-0500 2001
Pages (including cover): 3
From: Kathy Dorris
Comments:

Jud researched the August report and determined it was calculated in micro grams not miligrams, here is the edited report. The report from 2/19/01 is correct. The compute was edited to report mg but the calculation did not reflect that, sorry for any inconvenience.

Thanks

Kathy



BEST AVAILABLE COPY

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Order From:
Koogler Assoc.
4014 NW 13th St.
Gainesville, FL 32609

Date Reported : Aug29 2000
Project Number : FL Rock Ind.
PO Number : 187-00-09
FLDOH Number : E83018
NYSDOH Number : 11595
CTDPH Number : 0173
NCDEHNR Number : 296
SCDHEC Number : 96019

Be
Sampled: Jul25 2000 Date Received: Aug 9 2000 Lab Numbers: 31688-31697A
REPORT OF ANALYSIS Edited: 2-21-01 kd

Beryllium

mg

Accuracy: 91.8
Precision: .620
Stat. Limit: .00010
Client ID
Lab Number

CONT1R1
31688 0.000359

CONT2R1
31689 <0.00010

CONT3R1
31690 <0.00010

CONT1R2
31691 0.000212

CONT2R2
31692 <0.00010

CONT3R2
31693 0.000444

CONT1R3
31694 0.0000472

CONT2R3
31695 <0.00010

Certificate of Results

Sample integrity certified prior to analysis. Test results meet all requirements of the NELAC Standards, except as noted in the QA Report Section 4. This Report may not be reproduced in part, results relate only to items tested.

Jefferson L. Flowers, Ph.D
Jefferson S. Flowers, Ph.D
481 NEWBURYPORT Av.
ALTAMONTE SPRINGS
FLORIDA 32715-0597
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Gainesville, FL 32609

Date Reported : Aug29 2000
Project Number : FL Rock Ind.
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FLDOH Number : E83018
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NCDEHNR Number : 296
SCDHEC Number : 96019

For: Be

Date Sampled: Jul25 2000 Date Received: Aug 9 2000 Lab Numbers: 31688-31697A

REPORT OF ANALYSIS

Edited: 2-21-01 kd

Beryllium

mg

Accuracy: 91.8

Precision: .620

Det. Limit: .00010

Client ID

Lab Number

CONT3R3

31696 <0.00010

FILTDIBLANKS

31697 <0.00010

Certificate of Results

Sample integrity certified prior to analysis. Test results meet all requirements of the NELAC Standards, except as noted in the QA Report Section 4. This Report may not be reproduced in part, results relate only to items tested.

Jefferson S. Flowers, Ph.D.

President/Technical Director

BERYLLIUM
EMISSION MEASUREMENTS

Kiln/Raw Mill

**FLORIDA ROCK INDUSTRIES
THOMPSON S. BAKER CEMENT PLANT
Newberry, Florida**

Permit No. 0010087-003-AC/PSD-FL-228A

Test Date: September 18 & 20, 2001
Report Date: October 29, 2001

RECEIVED

OCT 31 2001

*Koogler & Associates
Environmental Services
4014 N.W. 13th Street
Gainesville, Florida
352-377-5822*

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

187-01-19



1.0 INTRODUCTION

Florida Rock Industries owns and operates a 2300 ton per day (clinker) dry process precalciner Portland cement plant on CR 235, two miles north of the city center of Newberry, Florida. The plant is permitted by Permit No. 0010087-003-AC/PSD-FL-228A. This report presents beryllium emission test data collected on September 18 & 20, 2001 on the kiln/raw mill stack.

On September 18 & 20, 2001, Koogler & Associates Environmental Services of Gainesville, Florida, conducted a fourth set of beryllium emission measurements on the kiln/raw mill stack as required by the above referenced permit. The tests were conducted in accordance with EPA Test Method 104 (40 CFR 61, Appendix B). The purpose of the testing was to develop additional data demonstrating compliance with the beryllium emission limiting standard of Permit No. 0010087-003-AC/PSD-FL-228A.

The Northeast District Office of the Florida Department of Environmental Protection (FDEP) in Jacksonville was notified of the emission measurements schedule and testing protocol.

During the September 18 & 20, 2001 test period, the kiln was operating at a preheater feed rate of 136.7 tons per hour and a clinker production rate of 80.6 tons

per hour. The coal feed rate to the kiln system averaged 9.21 tons per hour; corresponding to a heat input rate of about 230 mmBTU per hour. During test Run No. 1, the raw mill was not operating (direct plant operating mode) and during Run Nos. 2 and 3 the raw mill operated at an average throughput rate of 227 tons per hour (the compound plant operating mode).

Permit No. 0010087-003-AC/PSD-FL-228A. limits the preheater feed rate to 149.9 tons per hour; corresponding to a clinker production rate of about 95.8 tons per hour and the kiln system heat input rate is limited to 364 mmBTU per hour.

The permit for the plant limits beryllium emissions from the kiln/raw mill to a rate established by Best Available Control Technology and specifies that the emission limit for this pollutant be established based on "future stack tests". The September 2001 emission measurements reported herein represent the fourth set of emission measurements on the kiln/raw mill for beryllium. The previous beryllium emission measurements were conducted in July 2000, February 2001 and June 2001.

The emissions from the kiln/raw mill are controlled by an electrostatic precipitator (ESP). The measured mass emission rate of beryllium averaged 0.000081 pounds per hour during the September, 2001 tests. The beryllium emission rates measured in July 2000 and February and June 2001 were 0.000062, 0.000046, and 0.000015 pounds per hour respectively.

2.0 SAMPLING POINT LOCATIONS

Four sample ports are located in the 112-inch diameter, 241-foot high stack exhausting the kiln/raw mill. The ports are 50.6 feet (5.4 stack diameters) below the top of the stack and 146.8 feet (15.7 diameters) above the point where the kiln/raw mill gases enter the stack. Based on the requirements of EPA Method 1 (40 CFR 60, Appendix A), 12 sample points were selected; three points through each of the four ports.

3.0 FIELD AND ANALYTICAL PROCEDURES

Beryllium emission measurements were conducted using EPA Method 104. Sampling times for each test run were two hours in duration. The sampling point locations for the Method 104 were established in accordance with EPA Method 1. Stack gas velocity measurements and stack gas moisture measurements were made in conjunction with the EPA Method 104 tests in accordance with EPA Methods 2 and 4. Measurements to determine the dry molecular weight of the stack gas were made in accordance with EPA Method 3. All EPA tests methods are described in 40 CFR 60, Appendix A or 40 CFR 61, Appendix B and have been adopted by reference by FDEP by Rule 62-297.401, F.A.C. There were no variations or exceptions to any of the referenced test methods.

4.0 SUMMARY OF RESULTS

The beryllium emission rate from the kiln/raw mill, measured on September 18 and 20, 2001, ranged from 0.000031 to 0.000129 pounds per hour and averaged 0.000081 pounds per hour. These data are summarized in Table 1. The stack gas flow rate from the kiln/raw mill during the beryllium tests averaged 122,814 dry standard cubic feet per minute (188,584 acfm), the stack gas temperature averaged 221°F and the stack gas moisture averaged 17.0 percent.

These three sets of beryllium emission measurements provide a reasonable representation of beryllium emissions from the kiln/raw mill as required by Permit No. 0010087-003-AC/PSD-FL-228A.

Calculations, field and analytical data sheets, plant operating information, equipment calibration sheets and a list of project participants are included in the Appendix of this report.

Table 1

Summary of Beryllium - Kiln/Raw Mill Test Data

Florida Rock Industries
Cement Kiln/Raw Mill
SEPT. 18&20, 2001

Run No.	Process Weight Rate (Tons/hr)	Stack Gas Flow Rate (SCFMD)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Beryllium	
					Conc. (gr/dscf)	Emission Rate (Lbs/Hr)
1	115.3	99,894	255	16.6	3.59E-08	3.07E-05
2	134.7	134,476	202	16.8	7.26E-08	8.37E-05
3	160.0	134,071	205	17.6	1.12E-07	1.29E-04
Average	136.7	122,814	221	17.0	7.35E-08	8.11E-05

A. FIELD DATA SUMMARY

PLANT :	Florida Rock Industries Cement Kiln/Raw Mill		
DATE :	SEPT. 18&20, 2001		
	RUN 1	RUN 2	RUN 3
Vlc = Vol water collected in train, ml	392.0	509.0	550.0
Vm = Sample gas vol, meter cond., acf	94.618	121.000	126.210
Y = Meter calibration factor	1.0020	1.0020	1.0020
Pbar = Barometric pressure, in. Hg	30.16	30.08	30.08
Pstatic = Stack static pressure, in. H2O	0.40	0.40	0.40
dH = Avg meter pressure diff, in. H2O	1.99	3.22	3.55
Tm = Absolute meter temp., degrees R	547.2	545.7	560.1
Vm(std) = Sample gas vol, Std. cond., dscf	92.667	118.872	120.895
Bws = Water vapor in gas stream, fraction	0.166	0.168	0.176
MF = Moisture factor (1 - Bws)	0.834	0.832	0.824
CO2 = Carbon Dioxide, dry, volume %	19.50	18.00	16.00
O2 = Oxygen, dry, volume %	10.00	8.80	9.50
N2 = Nitrogen, dry volume %	70.50	73.20	74.50
Md = Molecular weight of stack gas, dry	31.52	31.23	30.94
Ms = Molecular weight of stack gas, wet	29.27	29.01	28.66
Cp = Pitot tube coefficient	0.84	0.84	0.84
Sq.Rt. dP = Avg. square root of each dP	0.6063	0.7845	0.7871
Ts = Absolute stack temp., degrees R	715.0	662.0	664.8
A = Area of stack, ft2	68.42	68.42	68.42
Qstd = Volumetric flowrate, dscfm	99,894	134,476	134,071
An = Nozzle area, ft2	5.17E-04	5.17E-04	5.17E-04
0 = Sample time, minutes	120.00	120.00	120.00
%I = Isokinetic variation, percent	102.23	97.42	99.37

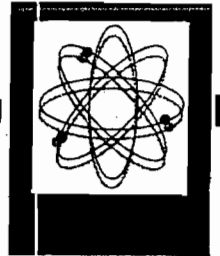
B. PARTICULATE DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln/Raw Mill
 DATE : SEPT. 18&20, 2001

	RUN 1	RUN 2	RUN 3
Sample Weight (FHW + MF + BHW), mg	0.00	0.00	0.00
Meter Volume, standard cond., Vm(std)	92.667	118.872	120.895
Carbon Dioxide, percent	19.50	18.00	16.00
Oxygen, percent	10.00	8.80	9.50
Sample Concentration :			
gr/scf	0.0000	0.0000	0.0000
gr/dscf	0.0000	0.0000	0.0000
gr/dscf @ 0 % CO2	0.0000	0.0000	0.0000
gr/dscf @ 0 % O2	0.0000	0.0000	0.0000
ppm * MW (dry gas).....	0.0	0.0	0.0
ppm * MW @ 0% CO2	0.0	0.0	0.0
ppm * MW @ 0% O2	0.0	0.0	0.0

FLOWERS

**CHEMICAL
LABORATORIES**
INCORPORATED



Received From:
Koogler Assoc.
4014 NW 13th St.
Gainesville, FL 32609

Date Reported : Oct26 2001
Project Number : 187-01
PO Number : Fla. Rock Ind.
FLDOH Number : E83018
NYSDOH Number : 11595
CTDPH Number : 0173
NCDEHNR Number : 296
NJDEP Number : 49015

For: Be-W Bomb
Date Received:

Oct 2 2001

Lab Numbers: 32459-32466

REPORT OF ANALYSIS

	Beryllium ug	Blank Corrected wts (ug)	Total Sample wt (ug)
Accuracy:			
Precision:			
Det.Limit:	.00100		
Client ID			
Lab Number			
C1R1 32459	0.613	0.215	0.216
C1R2 32460	0.957	0.559	0.560
C1R3 32461	0.776	0.378	0.379
C2R1 32462	<0.00100	0.0005	
C2R2 32463	<0.00100	0.0005	
C2R3 32464	<0.00100	0.0005	
FILTBLK 32465	0.797	0.399/filter	
ACEBLK 32466	<0.00100	0.0005	

Certificate of Results

Sample integrity certified prior to analysis. Test results meet all requirements of the NELAC standards, except as noted in the QA Report Section 4. This Report may not be reproduced in part, results relate only to items tested.

187 NEWBURYPORT AVE
ALTAMONTE SPRINGS, FLORIDA 32701
P.O. BOX 150597
ALTAMONTE SPRINGS, FLORIDA 32715-0597
BUS: (407) 339-5984
FAX: (407) 260-6110

Florida Rock Industries, Inc.
Cement Group
Thompson S. Baker Cement Plant

Process Weight Rate Sheet

Source: Kiln/Raw Mill Stack - EU003 & EU002 Test Date: September 18 & 20, 2001

Permit No.: 0010087-002-AV

Permitted Rate: 149.9 TPH Input

Test Parameter(s): Beryllium

Process Parameter: Kiln Feed Rate

	<u>Run Times</u>		<u>Process Input Rate</u>	
Run No. 1	<u>08:25</u> - <u>10:30</u>		<u>115.33</u>	TPH
Run No. 2	<u>07:40</u> - <u>13:11</u>		<u>134.67</u>	TPH
Run No. 3	<u>13:27</u> - <u>15:43</u>		<u>160.00</u>	TPH
		Avg.	<u>136.67</u>	TPH

I hereby certify that to the best of my knowledge the above data is true and correct.

George Townsend
Name (Print)

George Townsend
Signature

September 21, 2001
Date

Environmental & Safety Manager
Title

Florida Rock Industries, Inc.
Cement Group
Thompson S. Baker Cement Plant

Process Weight Rate Sheet

Source: Raw (Roller) Mill EU002

Test Date: September 18 & 20, 2001

Permit No.: 0010087-002-AV

Permitted Rate: 212.0 TPH

Process Parameter(s): Beryllium

Process Parameter: Raw Mill Feed Rate

	<u>Run Times</u>		<u>Process Input Rate</u>	
Run No. 1	<u>08:25</u> - <u>10:30</u>		<u>0.0</u>	TPH
Run No. 2	<u>07:40</u> - <u>13:11</u>		<u>221.93</u>	TPH
Run No. 3	<u>13:27</u> - <u>15:43</u>		<u>231.2</u>	TPH
		Avg.	<u>226.57</u>	TPH

I hereby certify that to the best of my knowledge the above data is true and correct.

George Townsend
Name (Print)

George Townsend
Signature

September 21, 2001
Date

Environmental & Safety Manager
Title

Florida Rock Industries, Inc.
Cement Group
Thompson S. Baker Cement Plant

Process Weight Rate Sheet

Source: Kiln/Raw Mill Stack - EU003 & EU002 Test Date: September 18 & 20, 2001

Permit No.: 0010087-002-AV

Permitted Rate: 14.0 TPH

Process Parameter(s): Beryllium

Process Parameter: Coal Firing Rate

	<u>Run Times</u>		<u>Process Input Rate</u>	
Run No. 1	<u>08:25</u> - <u>10:30</u>		<u>7.87</u>	TPH
Run No. 2	<u>07:40</u> - <u>13:11</u>		<u>9.37</u>	TPH
Run No. 3	<u>13:27</u> - <u>15:43</u>		<u>10.4</u>	TPH
		Avg.	<u>9.21</u>	TPH

I hereby certify that to the best of my knowledge the above data is true and correct.

George Townsend
Name (Print)

George Townsend
Signature

September 21, 2001
Date

Environmental & Safety Manager
Title



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

(904)807-3300 OR Suncom 804-3300
FAX: (904)448-4363 or SunCom 880-4363

AIR PROGRAM FACSIMILE TRANSMITTAL

TO: AL Lino

FAX: 292 6979 DATE: 30 Oct 01

FROM: Leslie Maybin PAGES: 4 including this cover
Extension: 3242

SUBJECT: FRI response

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY

COMMENTS: AL, the temperature is okay, but
the analysis isn't there for mercury.

"More Protection, Less Process"

Printed on recycled paper.



October 26, 2001

Mr. Chris Kirts
Department of Environmental Protection
Northeast District – Air Program
7825 Baymeadows Way
Suite 200B
Jacksonville FL 32256-7577

**Re: Objection by U.S. EPA Region 4, dated October 12, 2001
Thompson S. Baker Cement Plant – Newberry Florida**

Dear Mr. Kirts,

Attached are the protocols Florida Rock Industries Inc. plans to follow to comply with the conditions shown in the application for its Title V Operating Permit.

I trust these procedures are acceptable to FDEP and the U.S. EPA.

Sincerely
FLORIDA ROCK INDUSTRIES, INC.

A handwritten signature in cursive script that reads "Fred W. Cohrs".

Fred W. Cohrs
Vice president

FWC/bc
Attachments

Answers to U.S. EPA Region 4 Objections

1.b. Monitoring Requirements

Kiln Temperature: "The kiln temperature is monitored at the inlet to the kiln, the calciner and several stages of the preheater and in several stages of the preheater. Stage 1 exit temperature, which is measured downstream of the kiln inlet with respect to the temperature gradient in the pyro-processing system, must reach 1500 degrees F, before the tire feed system interlock allows the tire transport and the tire feed system to operate. Conversely, if the stage 1 preheater exit temperature drops below 1500 degrees F, the tire feed system is deactivated through the same interlocking control concept."

1.d. Monitoring Requirements

Sampling and Testing Requirements-Mercury: "Daily samples are taken of the kiln feed consumed and the coal burnt and analyzed as part of the cement quality control program. A portion of these samples is retained for a monthly composite sample. These composite samples are sent to a commercial laboratory for testing, including the quantitative determination of mercury.

The test reports are stored by the company with other environmental records for a period of 5 years."

Enclosure

U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Rock Industries, Inc.
Thompson S. Baker Cement Plant
Permit no. 0010087-002-AV

I EPA Objection Issues

- a. **Kiln Temperature:** Section III, condition C.3 of the permit requires the following: "Prior to initiating tire firing, gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum of 1400 °F for at least one hour." The permit does not contain any monitoring conditions associated with this requirement. In order to assure that the monitoring requirements of 40 C.F.R. 70.6(a)(3) are adequately addressed, the permit must contain monitoring and recordkeeping requirements to assure that the temperature of the exit gases is in the adequate range for the specified amount of time prior to using tires as fuel for the kiln.
- c. **Sampling and Testing Requirements - Mercury:** Condition C.3B of the permit requires the source to conduct monthly sampling and analysis for mercury. However, the permit does not specify any sampling requirements or test methods to assure compliance with the mercury limit contained in condition C.5. As required by 40 C.F.R. 70.6(c)(1), all title V permits must contain "... testing, monitoring, reporting and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit." In order to resolve this objection item, the appropriate sampling and testing requirements for mercury must be added to the permit.

October 12, 2001

Al, L41
these don't appear
to be major issues here.
S.

4APT-APB

Howard L. Rhodes, Director
Department of Environmental Protection
Division of Air Resources Management
Mail Station 5500
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Dear Mr. Rhodes:

The purpose of this letter is to notify the Florida Department of Environmental Protection (FDEP) that the U.S. Environmental Protection Agency (EPA) formally objects to the issuance of the proposed title V operating permit for Florida Rock Industries, Inc., Thompson S. Baker Cement Plant, located in Alachua County, Florida, which was received by EPA, via e-mail notification and FDEP's web site, on August 30, 2001. This letter also provides our general comments on the proposed permit.

Based on EPA's review of the proposed permit and the supporting information received for this facility, EPA objects, under the authority of Section 505(b) of the Clean Air Act ("the Act") and 40 C.F.R. 70.8(c) (see also Florida Regulation 62-213.450), to the issuance of the proposed title V permit for this facility. The basis for EPA's objection is that the permit does not fully meet the periodic monitoring requirements of 40 C.F.R. 70.6(a)(3)(i) and (c)(1), and does not contain conditions that assure compliance with all applicable requirements, as required by 40 C.F.R. 70.6(a). Pursuant to 40 C.F.R. 70.8(c), this letter and its enclosure contain a detailed explanation of the objection issues and the changes necessary to make the permit consistent with the requirements of 40 C.F.R. Part 70 and assure compliance with applicable requirements of the Clean Air Act. The enclosure also contains general comments applicable to the permit.

Section 70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or the requirements of 40 C.F.R. Part 70. Section 70.8(c)(4) of the title V regulations and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA, and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permit be submitted in advance in order that any outstanding issues may be resolved prior to the expiration of the 90-day period.

Enclosure

**U.S. EPA Region 4 Objection
Proposed Part 70 Operating Permit
Florida Rock Industries, Inc.
Thompson S. Baker Cement Plant
Permit no. 0010087-002-AV**

I EPA Objection Issues

1. Monitoring Requirements

1. Visible Emissions: The permit requires that Method 9 tests be conducted annually for units 001 and 002. For units 004 (EP01 & EP02), 005, 006 and 007 (EP01 & EP02), the permit requires that Method 9 tests be conducted once every five years. For most of these units, compliance with the visible emissions limit will be used to establish compliance with the particulate matter limit for the unit if the visible emissions are not in excess of 5% opacity. In most cases, this infrequent testing does not constitute adequate monitoring to assure continuous compliance with the visible emissions standard, as required by 40 C.F.R. 70.6(c)(1). Since most of these units have control equipment, it may be assumed that under normal operating conditions, no opacity may be observed. If this is the case, the permit should require the source to conduct and record the results of visible emissions observations on a daily basis (Method 22), and that a Method 9 test be conducted within 24 hours of any abnormal qualitative survey. However, if the units normally operate under conditions where opacity can be observed, then the permit must require that Method 9 testing be conducted on a frequent basis.

As an alternative to the approach described above, a technical demonstration can be included in the statement of basis explaining why the State has chosen not to require any additional visible emissions testing for these units. The demonstration needs to identify the rationale for basing the compliance certification on data from a short-term test performed once a year or once every five years.

2. Kiln Temperature: Section III, condition C.3 of the permit requires the following: "Prior to initiating tire firing, gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum of 1400 °F for at least one hour." The permit does not contain any monitoring conditions associated with this requirement. In order to ensure that the monitoring requirements of 40 C.F.R. 70.6(a)(3) are adequately addressed, the permit must contain monitoring and recordkeeping requirements to assure that the temperature of the exit gases is in the adequate range for the specified amount of time prior to using tires as fuel for the kiln.

If you have any questions or wish to discuss this further, please contact Mr. Gregg M. Worley, Chief of the Air Permits Section, at (404) 562-9141. Should your staff need additional information, they may contact Ms. Gracy R. Danois, Florida Title V Contact, at (404) 562-9119 or Ms. Lynda Crum, Associate Regional Counsel, at (404) 562-9524.

Sincerely,

/s/ Jesse Baskerville for

Winston A. Smith
Director
Air, Pesticides and Toxics
Management Division

Enclosure

cc: Mr. Fred W. Cohrs, Florida Rock Industries
Mr. Scott Sheplak, P.E., FDEP (via e-mail)
Mr. Chris Kirts, FDEP Northeast District (via e:mail)

1. Capacity: Conditions B.1, C.1, C.2, D.1, E.1, F.1 and G.1 specify the maximum capacity for the units at this facility. In previous title V permits, FDEP has included a permitting note with these requirements clarifying that these conditions are not intended to be enforceable limits, but as a basis for determining the percent capacity of the units during source testing. If this is the case, please add a permitting note to each of the conditions to clarify this. Otherwise, as required by 40 C.F.R. 70.6(a)(3), monitoring requirements sufficient to assure compliance with these capacity limitations need to be included in the permit for all the conditions listed above.
2. Sampling and Testing Requirements - Mercury: Condition C.38 of the permit requires the source to conduct monthly sampling and analysis for mercury. However, the permit does not specify any sampling requirements or test methods to assure compliance with the mercury limit contained in condition C.5. As required by 40 C.F.R. 70.6(c)(1), all title V permits must contain “. . . testing, monitoring, reporting and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit.” In order to resolve this objection item, the appropriate sampling and testing requirements for mercury must be added to the permit.

2. Applicable Requirements

New Source Performance Standards (NSPS), Subpart A: Florida Rock Industries is subject to the requirements of the NSPS Subparts A, F, Y and OOO. The permit addresses the applicable requirements from these subparts in the permit, with the exception of Subpart A. Although the permit contains the requirements of Subpart A in an attachment to the permit, the permit itself does not establish that the facility must comply with these requirements. A condition needs to be added to the permit addressing these requirements.

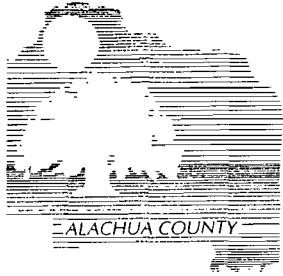
II **General Comments**

1. General Comment: Please note that EPA reserves the right to enforce any noncompliance, including any noncompliance related to issues that have not been specifically raised in these comments. After final issuance, this permit shall be reopened if EPA or the permitting authority determines that it must be revised or revoked to assure compliance with applicable requirements.
2. Annual Statement of Compliance: The permit for this facility does not contain a requirement addressing the source's obligation to submit a title V compliance certification to EPA annually. Although condition 51 of Appendix TV-3 contains the compliance certification requirements of 40 C.F.R. §70.6(c)(5)(iii), the permit itself does

not include a condition that cross-reference these requirements. Please add a condition to Section II of the permit to either contain all the compliance certification requirements or cross-reference the requirements already contained in Appendix TV-3.

3. Applicable Requirements - Section 112(r): Section II, condition 4 contains a general requirement to comply with 40 CFR Part 68 if the facility becomes subject to that part of the CAA. If Florida Rock Industries is indeed subject to the part 68 requirements, the permit requirements need to reflect the applicability of this part and to include the applicable certification update requirements from 40 CFR §68.190.
4. Subsumed Requirements: There are a number of instances where it appears that an applicable requirement (e.g., an emission limit) has been subsumed by a more stringent BACT limit. In such instances, for clarification purposes and to be in accordance with the streamlining guidance of White Paper No. 2, EPA suggests that a notation which identifies the subsumed requirement be added to the respective citation of authority for the more stringent limit. For example, the citation of authority for the visible emissions limit in condition A.2 may resemble the following:

[AC01-267311/PSD-FL-228, 40 CFR 60.622(c) and 60.672(a)(2) subsumed]



Board of County Commissioners

ALACHUA COUNTY ENVIRONMENTAL PROTECTION DEPARTMENT

201 SE 2nd Avenue, Suite 201 • Gainesville, Florida 32601

Tel: (352) 264-6800 • Fax (352) 264-6852

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September 18, 2001

Mr. Winston Smith, Director
Air, Pesticides & Toxics Management Division
U.S. Environmental Protection Agency Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Re: Florida Rock Industries, Inc., Thompson S. Baker Cement Plant
Proposed Title V Permit No. 0010087-002-AV

Dear Mr Smith:

The purpose of this letter is to provide Alachua County's comments regarding the Proposed Florida Department of Environmental Protection (FDEP) Title V permit for the Florida Rock Cement Plant in Newberry, FL. Alachua County Environmental Protection Department (ACEPD) wishes to express its specific concerns in hopes that they will be addressed in the final version of the Title V permit.

1) The Proposed Title V permit limits input of mercury compounds (as Hg) in all raw materials and fuel kiln system to 200 pounds per year. The County's position is that such limit is arbitrary and excessive, particularly in consideration of atmospheric deposition and existing mercury contamination in our waterways. These and other concerns were addressed in the enclosed letter from the Chair of the Alachua County Board of County Commissioners to State Senator Rod Smith. Alachua County requests that a condition be added to the Title V permit to require the use of coal with low-mercury content and to limit mercury emissions to a reduced level.

2) Based on past actions, Florida Rock has demonstrated that it cannot effectively control the quality of raw materials and fuels. Alachua County requests testing of mill scale and fly ash on regular basis to assure non-contamination, and thereby preventing excess VOC and metals emission.

3) The Proposed Title V permit states that 30-day rolling average Total Hydrocarbon (THC) emission rates reported by Continuous Emission Monitoring (CEM) systems shall be reported to the FDEP no later than the 15th day following each calendar quarter.

Alachua County requests that the CEM systems data for SO₂, NO_x, THC, the continuous opacity monitor (COM) data for opacity, the flow monitor data for volumetric flow, the process monitor for O₂ data and the clinker production data should be reported real-time to the FDEP and the ACEPD. Further, the hourly and the 30 day averages reported quarterly should not be limited to only THC emissions but should also include

RECEIVED

SEP 21 2001

BUREAU OF AIR REGULATION



September 18, 2001

Page 2

the preheater feed rate, and the clinker production rates. ACEPD is concerned that these process parameters should also be included in the report.

Further, all times of the quarter shall be reported including times when the kiln is fed with only fuel (coal, whole tires, No.2 unused fuel oil, propane). ACEPD is concerned that there will be certain times when clinker production is not being produced yet some fuel is processed in the kiln and which may go unreported.

4) The Proposed Title V permit states that manual stack tests for particulate, carbon monoxide, VOC, beryllium and sulfuric acid mist should be performed while firing both fuels (70% to 100% coal and 0 to 30% tires) and while the continuous monitoring systems are functioning properly. Alachua County requests that CEM systems data for SO₂, NO_x, THC and COM data for opacity, the flow monitor data for volumetric flow, the process monitor for O₂ and the clinker production rates data should be reported for the same time period. ACEPD is concerned that certain parameters during the manual stack testing could be altered to achieve the desired test compliance for the manual test and which could change the emissions monitored by CEM systems.

5) The Proposed Title V permit does not address fine particulate matter (smaller than 2.5 microns in effective diameter). Alachua County requests that the permit provide a schedule requiring modification of the Operating Permit to impose EPA emission limits for fine particulate matter immediately upon the date of implementation.

6) The Proposed Title V permit states that prior to initiating tire firing, the gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum 1400 degrees F for at least one hour. Alachua County requests that a condition be added to ensure that continuous temperature data be monitored and that these are available real-time to FDEP and ACEPD.

Should you have any questions or comments about this, please contact Mr. Lalit Lalwani at the above letterhead address or by phone at 352-264-6800.

Sincerely,



Chris Bird, Director

Alachua County Environmental Protection Department

enclosures (1)

cc. Al Linero, FDEP Tallahassee
Chris Kirts, FDEP NE District
David C. Schwartz, Esq.
Randall Reid, County Manager
Board of County Commissioners



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

August 20, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No. 0010087-003-AC (PSD-FL-228A)
Newberry Cement Plant – Permit Modification

Dear Mr. Baker:

The Department reviewed your July 17, 2000 request and the additional information subsequently submitted to extend and modify the referenced construction permit.

The existing permit also requires that the Department set certain emission limits based on test data. The Department has received sufficient data to set the final sulfuric acid mist limit, but does not yet have sufficient data to set final sulfur dioxide and beryllium limits.

The existing permit is hereby modified as follows:

EXPIRATION DATE

The expiration date is hereby extended until August 31, 2001. All physical construction required to make cement and to conduct initial testing is complete. This permit modification authorizes further work only for replacement or addition of continuous emission monitoring equipment and conversion of the precombustor to a Low NO_x Multi-Stage Combustion (MSC) calciner to meet the lower nitrogen oxides emission limit as described in Table II of the original permit. All additional construction related to installation of the MSC shall be completed by December 31, 2001 under the compliance plan of the Title V Permit.

SPECIFIC CONDITION 4 (First Paragraph)

Fuels fired in the pyroprocessing system (kiln and combustor) shall not exceed a total maximum heat input of 364 MMBtu/hr and shall consist only of coal, (usage rate shall not exceed 14.0 TPH), whole tires, propane, and unused No. 2 fuel oil which may also be fired in the Raw Mill Air Heater. Propane usage is limited to startup and in lieu of tires in the first stage of the MSC. All fuel usage shall be in compliance with the following limits and conditions: [Rule 62-210.200(225), F.A.C.]

SPECIFIC CONDITION 4.b. (Revised)

Whole tires may be used as an alternate fuel. Such tires shall be fed into the kiln system at the transition section between the base of the precalciner and the point where gases exit the kiln. The tire feeder mechanism shall ~~have a double airlock, vertical and horizontal guillotine gates, and a ram~~ consist of a rotary feeder, which seals the tire entry point from the atmosphere. The permitted feed rate shall not exceed 109.2 MMBtu/hr (30% of total kiln fuel input) or 4.2 TPH (approximately 400 tires per hour) and 36,792 TPY. Before initiating tire firing, the gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum of 1,440 degrees F for at least one hour.

"More Protection, Less Process"

Printed on recycled paper.

SPECIFIC CONDITION 5, TABLE I (Revised)

Attached Table I is hereby modified to reflect the following as-constructed details:

- Dust Collector E- 29 is eliminated as the dust from that transfer point and is now vented back into the kiln/raw mill ESP (collector E-19 and Emission Point E-21).
- Dust Collector M-07 is eliminated because of the redesign of the discharge system of the clinker storage silos.
- Dust Collector N-14 is renamed N-19, and still serves the same function in the finish mill.
- Dust Collector Q-27 is eliminated by inter-venting the four Portland cement silos through a single dust collector. A separate baghouse still exists on the cement silo used for masonry cement.

SPECIFIC CONDITION 5, TABLE II (Revised)

The final H₂SO₄ emission limit and the compliance details for the lower NO_x limit of 2.8 pounds per ton of clinker are shown in Revised Table II.

SPECIFIC CONDITION 6 (Revised)

With respect to conducting manual stack tests, the relevant language in Specific Condition 6 is modified as follows:

The manual stack tests shall be conducted while firing both primary fuels at permitted capacity (70 to 100% coal and 0 to 30% tires) and while all continuous monitoring systems are functioning properly, and with all process units operating at their permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the units may be tested at less than 90% of the maximum operating rate allowed by the permit. In this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the units are so limited, then operation at higher capacities (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit.

[Rule 62-297.310(2)(b), F.A.C.]

If the kiln is tested while firing less than 30% tires, subsequent operation is limited to 110% of the percentage of tires burned during the test, not to exceed 30% of the total heat input. Once the kiln is so limited, then operation at greater tire burning rates (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. Operation at greater tire burning rates (with prior notification provided to the Department) is also allowed for no more than 45 consecutive days in conjunction with installation and testing of the MSC. [Rule 62-297.310(2)(b), F.A.C.]

SPECIFIC CONDITION 6.a. (New)

Permittee shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) in the kiln/raw mill stack to measure and record the emissions of total hydrocarbons (THC as propane) to provide reasonable assurance that the facility will continue to meet the VOC emission limit established by permit. The CEMS shall be installed, certified, operated and maintained in accordance with Performance Specification 8A of Appendix B, 40 CFR 60. The CEMS shall be used in conjunction with a flow rate sensor certified in accordance with Performance Specification 6 of Appendix B, 40 CFR 60 to calculate THC emission rates. The owner or operator shall report no later than the 15th day following each calendar quarter a summary of the 30-day rolling average THC emission rates reported by the CEMS for the days of that calendar quarter to the Department's Northeast District Office. The daily averages used to compute the 30-day rolling averages shall also be provided in the summary. These results should be reported as pounds per hour of THC, and pounds of THC per ton of clinker. [Rule 62-4.070, F.A.C.]

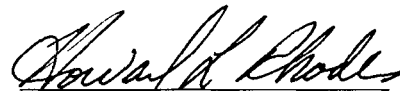
SPECIFIC CONDITION 6.b. (New)

Permittee shall conduct quarterly beryllium tests on emissions from the kiln/raw mill stack by June 30, September 30, and December 31, 2001 using the methods described in Specific Condition 6. Test reports shall be submitted to the Department's Northeast District Office and the Bureau of Air Regulation in Tallahassee within 45 days after conducting the tests.
[Rules 62-212.400 and 62-4.070, F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 8/22/01 to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Chris Kirts, DEP NED
Chair, Alachua County Commission*
Chris Bird, Alachua County EPD
Segundo J. Fernandez, Esq., OHF&C*

W. Douglas Beason, Esq., DEP OGC
David Schwartz, Esq., Alachua County*
James J. Konish, Esq., FPLW*
Arthur Saarinen*
Rob Luna, NCFGP*

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

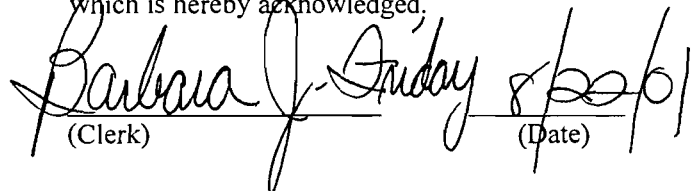

(Clerk) 8/22/01 (Date)

Table I Allowable Opacity Limitations
Florida Rock Industries

Stack #	Description	Grain Loading	OPACITY
Emission Unit 1: Raw Material Process Rate = 1,211,250 TPY Processed			
Fugitive	Material Processing		10
Fugitive	Handling and Storage		10
Fugitive	Crusher		15
Emission Unit 2: Raw Mill System Process Rate = 212 TPH Raw Materials			
E-28	Recycle dust + raw meal to homogenization silo	0.01 gr/dscf	5
G-07	Recycle dust + raw meal to homogenization silo	0.01 gr/dscf	5
H-08	Raw meal + recycle dust to preheater	0.01 gr/dscf	5
Emission Unit 3: Kiln System Process Rate = 364 MMBTU/heat input			
E-21	Kiln Operations (ESP)		10
E-21	In-process fuel: coal		10
E-21	In-process fuel: tires		10
	Tires (30 % of total heat input)		
Emission Unit 4: Clinker Handling Process Rate = 95.83 TPH Clinker			
L-03	Clinker cooler discharge and breaker	0.01 gr/dscf	5
L-06	Clinker into clinker silos	0.01 gr/dscf	5
K-15	Clinker Cooler (ESP)		10
Emission Unit 5: Finish Grinding Operations Process Rate = 136 TPH Cement Output			
M-08	Clinker to finish mill	0.01 gr/dscf	5
N-09	Finish mill air separator	0.01 gr/dscf	5
N-12	Finish mill	0.01 gr/dscf	5
N-19	Cement handling in finish mill	0.01 gr/dscf	5
Q-25	Cement storage silos	0.01 gr/dscf	5
Q-26	Cement storage silos	0.01 gr/dscf	5
Emission Unit 6: Cement Handling Process Rate = 500 TPH Cement Unloading			
Q-14	Cement silo loadout	0.01 gr/dscf	5
Q-17	Cement silo loadout	0.01 gr/dscf	5
Q-21	Cement silo loadout	0.01 gr/dscf	5
R-12	Cement bagging operation	0.01 gr/dscf	5
Emission Unit 7: Coal Handling and Grinding Process Rate = 14 TPH Pulverized Coal			
S-17	Coal Mill	0.01 gr/dscf	5
S-21	Pulverized coal storage bin	0.01 gr/dscf	5
Fugitive	Coal Handling and Storage		5/20

Table II
Allowable Emissions
Florida Rock Industries

Pollutant	Bact Emission Limit		Emission Rate *		Basis
	lb/ton clinker	lb/ton dry feed	lb/hr	ton/yr	
PM (kiln)	0.31	0.20	30.00	110.50	BACT
PM ₁₀ (kiln)	0.26	0.17	25.50	93.93	BACT
PM (cooler)	0.16	0.10	14.99	55.70	BACT-NSPS
PM ₁₀ (cooler)	0.13	0.09	12.71	47.34	BACT
SO ₂ (kiln) ⁺	0.28	0.18	28.82	108.55	BACT
NO _x (kiln)**	2.80	1.80	268.30	1018.00	BACT
H ₂ SO ₄ (kiln)	<u>0.0025</u>	<u>0.0016</u>	<u>0.25</u>	<u>1</u>	BACT
CO (kiln)	3.60	2.30	346.38	1288.60	BACT
VOC (kiln)	0.12	0.08	11.55	42.90	BACT
Beryllium	TO BE DETERMINED BY FUTURE STACK TESTS				BACT

Notes:

- * The kiln emission rate includes fuel oil combustion emissions from the raw mill air heater.
- ** After startup and until December 31, 2001, the kiln shall not exceed a NO_x limit of 3.8 lb/ton clinker and 2.8 lb/ton clinker thereafter (30-day rolling average). A compliance demonstration with the 2.8 lb/ton limit for the first 30-day period following December 31 (January 1-30, 2002) shall be submitted by Florida Rock to the Northeast District Office by February 15, 2002. The Department may revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on continuous emission monitoring data covering the period January 1-March 31, 2002 to be submitted by Florida Rock to the Department's Northeast District by April 15, 2002.
- + The Department may revise the SO₂ limit to less than 0.28 lb/ton clinker based on compliance test and continuous monitoring data.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John D. Baker, President
 Florida Rock Industries, Inc.
 155 East 21 Street
 Jacksonville, Florida 32206

2. Article Number (Copy from service label)

7000 0600 0026 4129 8139

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) _____ B. Date of Delivery
 8/24/01

C. Signature *x H. Payne* Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
Mr. John D. Baker, President	
Postage	\$ _____
Certified Fee	_____
Return Receipt Fee (Endorsement Required)	_____
Restricted Delivery Fee (Endorsement Required)	_____
Total Postage & Fees	\$ _____
Postmark Here	
Recipient's Name (Please Print Clearly) (to be completed by mailer) Florida Rock Industries, Inc. Street, Apt. No., or PO Box No. 155 East 21 Street City, State, ZIP+4 Jacksonville, FL 32206	
PS Form 3800, February 2000	See Reverse for Instructions

7000 0600 0026 4129 8139

LAW OFFICES

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

301 S. BRONOUGH ST., 5TH FL.
POST OFFICE BOX 1110 (ZIP 32302-1110)
TALLAHASSEE, FLORIDA 32301

(850) 521-0700
FAX (850) 521-0720

Facsimile Cover Sheet

DATE: August 20, 2001

CLIENT NO. 2320-1

TO: Al Linero 922-6979

FROM: Segundo J. Fernandez

- 3 pages, including cover sheet are being transmitted for the following reason(s):
- As we discussed
- As requested
- For your information

Hard copy will be sent:

- Via regular mail
- Via overnight mail
- X Via facsimile only

Document Description:

These are the first and last pages of Alachua County's Dismissal which you requested from my office today.

This facsimile message may contain privileged and confidential information intended only for the individual named above. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution, or copying of this communication is prohibited. If this communication was received in error, please immediately notify us by telephone and return the original message to us at the address above.

If you do not receive all of the pages or if they are not legible, please call (850) 521-0700 and ask to speak with Bridgett.

Linero, Alvaro

From: David Schwartz [Dcs@SMTP.CO.ALACHUA.FL.US]
Sent: Monday, July 16, 2001 10:44 AM
To: Linero, Alvaro; Beason, Doug; sfernandez@ohfc.com
Cc: Chris@dep.state.fl.us; Kirts, Christopher; DWW@dep.state.fl.us; JJM@dep.state.fl.us; Maybin, Leslie; llalwani@dep.state.fl.us; tatkinson@ohfc.com; wzege@waterandair.com; koogler@worldnet.att.net
Subject: RE: Florida Rock draft AC Permit Modification

FlaRockPetDism2.wpd

Attached is the County's proposed dismissal of its petition. Just to confirm, one last time, that no further changes have occurred, and none are contemplated. Doug and Segundo, please look over this draft before I sign and file. Let me know if you have any concerns. Thanks.

**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

ALACHUA COUNTY,

Petitioner,

v.

Case No.:

FDEP File Nos. 0010087-003-AC/PSD-FL-228-A
and 0010087-002-AV

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

and

FLORIDA ROCK INDUSTRIES, INC.,

Respondents.

**NOTICE OF VOLUNTARY DISMISSAL
OF ALACHUA COUNTY'S PETITION FOR FORMAL ADMINISTRATIVE HEARING**

Petitioner, Alachua County ("County"), hereby gives notice of voluntarily dismissing, without prejudice, its Petition for Formal Administrative Hearing ("Petition") in the above-styled matter, and states the following:

1. On March 1, 2001, the County timely filed its Petition.
2. By telephone conversation between the undersigned and Douglas Beason, Esquire, on June 12, 2001, the State of Florida Department of Environmental Protection ("Department") informed the County that additional changes to the subject draft permits had been finally agreed upon by the Department and Florida Rock Industries, Inc.
3. By copies of letters dated June 8 and July 2, 2001, from Clair Fancy to John Baker, and June 12 and July 3, 2001, from Christopher Kirts to John Baker, the Department represented

to the County that the final draft permit language agreed upon by the Department and Florida Rock Industries, Inc. is as set forth in the documents attached to such letters. These letters and attachments are attached hereto and incorporated as Exhibit A.

Based upon the foregoing, the County voluntarily dismisses its Petition, without prejudice, conditioned upon the draft permits becoming final and effective in strict accordance with the terms embodied in Exhibit A. Should any further changes be made to the draft permits, or should the draft permits not become final for any reason, the County reserves the right to refile or reinstate its Petition as to any and all issues in order to protect the County's interests regarding the content of the final permits. Furthermore, the County hereby requests the Department to provide the County with written notice of any further changes to the draft permits, and written notice of any further permit modifications, renewals, or new permits concerning the subject cement plant.

Respectfully submitted this _____ day of July, 2001.

ALACHUA COUNTY ATTORNEY'S OFFICE

David C. Schwartz
Assistant County Attorney
Florida Bar No. 749079
Alachua County Attorney's Office
Post Office Box 2877
Gainesville, FL 32602-2877
(352) 374-5218

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. Mail to Douglas Beason, Esquire, State of Florida Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Blvd., MS 35, Tallahassee, Florida 32399-3900 and Segundo Fernandez, Esquire, Oertel, Hoffman, Fernandez & Cole, P.A., 301 South Bronough Street, Suite 500, Tallahassee, Florida 32301 on this _____ day of July, 2001.

David C. Schwartz
Assistant County Attorney

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

301 SOUTH BRONOUGH STREET
SUITE 500
TALLAHASSEE, FLORIDA 32301

MAILING ADDRESS:
POST OFFICE BOX 1110
TALLAHASSEE, FLORIDA 32302-1110

TIMOTHY P. ATKINSON
JEFFREY BROWN
M. CHRISTOPHER BRYANT
C. ANTHONY CLEVELAND
TERRY COLE
SEGUNDO J. FERNANDEZ
SCOTT W. FOLTZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
PATRICIA A. RENOVITCH

PAUL A. LEHRMAN
OF COUNSEL

RECEIVED
FAX (904) 521-0720

AUG 01 2001

BUREAU OF AIR REGULATION

July 30, 2001

<http://www.ohfc.com>

RECEIVED

AUG 01 2001

BUREAU OF AIR REGULATION

VIA FACSIMILE AND U.S. MAIL

Douglas W. Beason, Assistant General Counsel
Office of General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Re: Withdrawal of Request for Extension of Time to File Petition for
Administrative Hearing; Thompson S. Baker Cement Plant, Newberry,
Alachua County, Florida
Draft Modified Air Construction Permit Modification: FDEP File No.:
0010087-003-AC/PSD-FL-228-A
Draft Title V Permit No.: 0010087-002-AV

Dear Doug:

As you know, we represent Florida Rock Industries, Inc. with respect to the Air Construction Permit and Title V Permit for the above-referenced facility. The company received on January 30, 2001, the Department's Intent to Issue the draft Air Construction Permit Modification and the draft Title V Permit, both dated January 26, 2001.

On February 8, 2001, and again on March 1, 2001, we requested, pursuant to Rule 28-106.111, Florida Administrative Code, extensions of time to file a petition for administrative hearing on the draft air construction permit and the draft Title V permit. The Department has not acted on any of Florida Rock's previous extension requests regarding these draft permits. As such, the extensions have remained effective.

Since that time, Florida Rock has continued to exchange information with the Department concerning the draft Modified Air Construction Permit and draft Title V Permit, and appreciates the cooperative nature of such discussions. It now appears that such discussions are concluded and that the permits are revised and completed. The draft Modified Air Construction Permit, FDEP File No. 0010087-003-AC/PSD-FL-228-A, dated January 26, 2001, was revised by the Department on June 15, 2001, and was further

Douglas W. Beason, Assistant General Counsel
July 30, 2001
Page 2

revised on July 2, 2001. See attached copies. The draft Title V Permit, FDEP File No. 0010087-002-AV, dated January 26, 2001, was revised by the Department on June 12, 2001, and was further revised on July 3, 2001. See attached copies.

Consequently, on behalf of Florida Rock Industries, Inc., and in reliance on the revisions to the draft permits referenced above, we hereby withdraw the previous requests for an extension to file a petition for administrative hearing pursuant to Rule 28-106.111, Florida Administrative Code, with respect to the draft Air Construction Permit Modification and with respect to the draft Title V Permit, both referenced above.

Thank you for your consideration. If you have any questions, please do not hesitate to call me.

Sincerely,



Segundo J. Fernandez

- c: Howard Rhodes
- C. H. Fancy, P.E.
- Al Linero, P.E.
- Chris Kirts
- John D. Baker, II
- Fred W. Cohrs
- John Koogler, Ph.D., P.E.

BERYLLIUM
EMISSION MEASUREMENTS

Kiln/Raw Mill

FLORIDA ROCK INDUSTRIES
THOMPSON S. BAKER CEMENT PLANT
Newberry, Florida

Permit No. AC01-267311/PSD-FL-228

Test Date: ~~July~~ ^{JUNE} 28, 2001
Report Date: July 26, 2001

*Koogler & Associates
Environmental Services
4014 N.W. 13th Street
Gainesville, Florida
352-377-5822*

RECEIVED

JUL 27 2001

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

187-00-09



1.0 INTRODUCTION

Florida Rock Industries owns and operates a 2300 ton per day (clinker) dry process precalciner Portland cement plant on CR 235, two miles north of the city center of Newberry, Florida. This report presents beryllium emission test data collected on June 28, 2001 on the kiln/raw mill stack.

On June 28, 2001, Koogler & Associates Environmental Services of Gainesville, Florida, conducted a third set of beryllium emission measurements on the kiln/raw mill stack in accordance with EPA Test Method 104 (40 CFR 61, Appendix B). The purpose of the testing was to develop additional data to be used for establishing a beryllium emission limit for the plant, as required by Permit AC01-267311/PSD-FL-228.

The Northeast District Office of the Florida Department of Environmental Protection (FDEP) in Jacksonville was notified of the emission measurements schedule and testing protocol. Mr. Mort Benjamin of the Northeast District Office of FDEP in Jacksonville, was present to witness testing.

During the June 28, 2001 test period, the kiln was operating at a preheater feed rate of 147.7 tons per hour and a clinker production rate of 92.5 tons per hour. The coal feed rate to the kiln system averaged 10.01 tons per hour; corresponding to a heat

input rate of about 250 mmBTU per hour. Permit AC01-267311 limits the preheater feed rate to 149.9 tons per hour; corresponding to a clinker production rate of about 95.8 tons per hour and the kiln system heat input rate is limited to 364 mmBTU per hour.

The permit for the plant limits beryllium emissions from the kiln/raw mill to a rate established by Best Available Control Technology and specifies that the emission limit for this pollutant be established based on "future stack tests". The June 2001 emission measurements reported herein represent the third set of emission measurements on the kiln/raw mill for beryllium. The previous beryllium emission measurements were conducted in July 2000 and February 2001.

The emissions from the kiln/raw mill are controlled by an electrostatic precipitator (ESP). The measured mass emission rate of beryllium averaged 0.000015 pounds per hour on June 28, 2001. The beryllium emission rates measured in July 2000 and February 2001 were 0.000062 and 0.000046 pounds per hour respectively.

2.0 SAMPLING POINT LOCATIONS

Four sample ports are located in the 112-inch diameter, 241-foot high stack exhausting the kiln/raw mill. The ports are 50.6 feet (5.4 stack diameters) below the top of the stack and 146.8 feet (15.7 diameters) above the point where the kiln/raw mill gases enter the stack. Based on the requirements of EPA Method 1 (40 CFR 60, Appendix A), 12 sample points were selected; three points through each of the four ports.

3.0 FIELD AND ANALYTICAL PROCEDURES

Beryllium emission measurements were conducted using EPA Method 104. The sampling point locations for the Method 104 were established in accordance with EPA Method 1. Stack gas velocity measurements and stack gas moisture measurements were made in conjunction with the EPA Method 104 tests in accordance with EPA Methods 2 and 4. Measurements to determine the dry molecular weight of the stack gas were made in accordance with EPA Method 3. All EPA tests methods are described in 40 CFR 60, Appendix A or 40 CFR 61, Appendix B and have been adopted by reference by FDEP by Rule 62-297.401, F.A.C. There were no variations or exceptions to any of the referenced test methods.

4.0 SUMMARY OF RESULTS

The beryllium emission rate from the kiln/raw mill, measured on June 28, 2001, ranged from 0.000001 to 0.000029 pounds per hour and averaged 0.000015 pounds per hour. These data are summarized in Table 1. The stack gas flow rate from the kiln/raw mill during the beryllium tests averaged 142,929 dry standard cubic feet per minute (213,172 acfm), the stack gas temperature averaged 216°F and the stack gas moisture averaged 15.2 percent.

These three sets of beryllium emission measurements provide a reasonable representation of beryllium emissions from the kiln/raw mill as required by Permit AC01-267311.

Calculations, field and analytical data sheets, plant operating information, equipment calibration sheets and a list of project participants are included in the Appendix of this report.

Table 1

Summary of Beryllium - Kiln/Raw Mill Test Data

Florida Rock
Cement Plant
June 28, 2001

Run No.	Process Weight Rate (Tons/hr)	Stack Gas Flow Rate (SCFMD)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Total Beryllium	
					Conc. (gr/dscf)	Emission Rate (Lbs/Hr)
1	150.0	144,761	212	14.7	1.27E-08	1.58E-05
2	145.0	142,079	216	15.3	4.53E-10	5.51E-07
3	148.0	141,946	221	15.7	2.37E-08	2.89E-05
Average	147.7	142,929	216	15.2	1.23E-08	1.51E-05

A. FIELD DATA SUMMARY

PLANT : Florida Rock
Cement Plant
DATE : June 28, 2001

	RUN 1	RUN 2	RUN 3
Vlc = Vol water collected in train, ml	472.6	274.1	283.5
Vm = Sample gas vol, meter cond., acf	130.298	73.950	74.672
Y = Meter calibration factor	0.9950	0.9950	0.9950
Pbar = Barometric pressure, in. Hg	30.34	30.34	30.34
Pstatic = Stack static pressure, in. H2O	-0.30	-0.30	-0.30
dH = Avg meter pressure diff, in. H2O	3.63	1.11	1.11
Tm = Absolute meter temp., degrees R	543.8	551.9	556.3
Vm(std) = Sample gas vol, Std. cond., dscf	128.763	71.572	71.707
Bws = Water vapor in gas stream, fraction	0.147	0.153	0.157
MF = Moisture factor (1 - Bws)	0.853	0.847	0.843
CO2 = Carbon Dioxide, dry, volume %	15.20	14.40	12.00
O2 = Oxygen, dry, volume %	10.80	11.20	11.50
N2 = Nitrogen, dry volume %	74.00	74.40	76.50
Md = Molecular weight of stack gas, dry	30.86	30.75	30.38
Ms = Molecular weight of stack gas, wet	28.97	28.80	28.44
Cp = Pitot tube coefficient	0.84	0.84	0.84
Sq.Rt. dP = Avg. square root of each dP	0.8271	0.8169	0.8181
Ts = Absolute stack temp., degrees R	672.2	676.0	681.2
A = Area of stack, ft ²	68.42	68.42	68.42
Qstd = Volumetric flowrate, dscfm	144,761	142,079	141,946
An = Nozzle area, ft ²	5.04E-04	2.76E-04	2.76E-04
0 = Sample time, minutes	120.00	120.00	120.00
%I = Isokinetic variation, percent	100.62	104.03	104.32

B. PARTICULATE DATA SUMMARY

PLANT : Florida Rock
 Cement Plant
 DATE : June 28, 2001

	RUN 1	RUN 2	RUN 3
Sample Weight (FHW + MF + BHW), mg	0.00	0.00	0.00
Meter Volume, standard cond., Vm(std)	128.763	71.572	71.707
Carbon Dioxide, percent	15.20	14.40	12.00
Oxygen, percent	10.80	11.20	11.50
Sample Concentration :			
gr/scf	0.0000	0.0000	0.0000
gr/dscf	0.0000	0.0000	0.0000
gr/dscf @ 0 % CO2	0.0000	0.0000	0.0000
gr/dscf @ 0 % O2	0.0000	0.0000	0.0000
ppm * MW (dry gas).....	0.0	0.0	0.0
ppm * MW @ 0% CO2	0.0	0.0	0.0
ppm * MW @ 0% O2	0.0	0.0	0.0



Received From:
 Koogler Assoc.
 4014 NW 13th St.
 Gainsville, FL 32609

Date Reported : Jul12 2001
 Project Number : 187-00-09
 PO Number : Fla. Rock Ind.
 FLDOH Number : E83018
 NYSDOH Number : 11595
 CTDPH Number : 0173
 NCDEHNR Number : 296
 SCDHEC Number : 96019

For: Bomb Be-W
 Date Sampled: Jun28 2001 Date Received: Jul 2 2001 Lab Numbers: 12469-12476
 REPORT OF ANALYSIS Edited: 7-23-01 kd

	Beryllium ug	Blank Corrected (ug)
Accuracy:		
Precision:		
Det. Limit:	.00100	
Client ID		
Lab Number		
FR1 12469	0.138	0.1057
FR2 12470	0.0339	0.0016
FR3 12471	0.142	0.1097
IMPR1 12472	<0.00100	0.0005
IMPR2 12473	<0.00100	0.0005
IMPR3 12474	<0.00100	0.0005
WABLANK 12475	<0.00100	
FILTBLANK 12476 (2R1hrs)	0.0646	= 0.0323 ug / Filter

Certificate of Results

Sample integrity certified prior to analysis. Test results meet all requirements of the NELAC Standards, except as noted in the QA Report Section 4. This Report may not be reproduced in part, results relate only to items tested.

Serving Your Analytical and Environmental Needs Since 1957
 Jefferson S. Flowers, Ph.D.
 President/Technical Director

Jefferson L. Flowers, Ph.D.
 Jefferson S. Flowers, Ph.D.
 481 NEWBURYPORT Av.
 ALTAMONTE SPRINGS
 FLORIDA 32715-0597
 BUS: (407) 339-5984
 FAX: (407) 260-6110

Florida Rock Industries, Inc.
 Cement Group
 Thompson S. Baker Cement plant

Process Weight Rate Sheet

Source: Kiln/Raw Mill Stack

Test Date: June 28, 2001

Permit No.: AC01-267311

Permitted Rate: 149.9 TPH

Test Parameter(s): Beryllium

	<u>Run Times</u>	<u>Process Input Rate</u>	
Run No. 1	<u>07:31</u> - <u>09:36</u>	<u>150</u>	TPH
Run No. 2	<u>10:01</u> - <u>12:08</u>	<u>145</u>	TPH
Run No. 3	<u>12:24</u> - <u>14:33</u>	<u>148</u>	TPH

I here by certify that to the best of my knowledge the above data is true and correct.

George Townsend
 Name (Print)

George Townsend
 Signature

June 29, 2001
 Date

Environmental & Safety Manager
 Title

Florida Rock Industries, Inc.
Cement Group
Thompson S. Baker Cement Plant

Kiln/Precalciner Coal Feed Rate

Test Date: June 28, 2001 Test Parameter(s): Beryllium

Run No.	Run Times		Avg. Kiln - Dry Basis Coal Feed Rate TPH		
			Main Burner	Precalciner	Total
1	7:31	9:36	5.00	5.10	10.10
2	10:01	12:08	4.63	5.12	9.75
3	12:24	14:33	4.83	5.36	10.19
				Avg.	10.01

Permitted Coal Usage Rate: 14.00 TPH

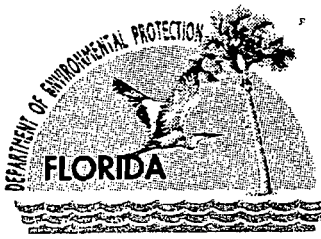
I here by certify that to the best of my knowledge the above data is true and correct.

George Townsend
Name (Print)

George Townsend
Signature

June 29, 2001
Date

Environmental & Safety Manager
Title



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

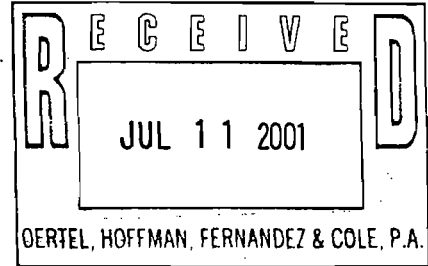
David B. Struhs
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 3, 2001

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, FL 32206

RE: DEP File No.: 0010087-002-AV
Thompson S. Baker (Newberry) Cement Plant



Dear Mr. Baker:

Please find enclosed one revised copy of Table II, Allowable Emissions of the revised Draft Air Construction Permit Modification. We have revised the second footnote to Table II, Allowable Emissions, to reflect that the compliance demonstration with the 2.8 lb/ton limit for NOx shall be submitted by Florida Rock by February 15, 2002.

If you have any questions regarding this matter, please call me at (904) 807-3235.

Sincerely,

Christopher L. Kirts, P.E.
District Air Program Administrator

Enclosure

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Letter and DRAFT Air Title V Permit Modification were sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on

7/6/01.

John D. Baker, FRI *
Fred W. Cohrs, FRI
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
W. Douglas Beason, Esq., DEP OGC
Rob Luna, NCFGP*
John Koogler, K&A

Segundo J. Fernandez, Esq., OHF&C *
David Schwartz, Esq., Alachua County *
Arthur Sarrinen *
Chair, Alachua County Commission *
Chris Bird, Alachua County EPD
James J. Konish, Esq., FPLW *

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to §120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

North J. Fernandez 7/6/01
Clerk Date

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21 St.
Jacksonville, FL 32206

2. Article Number (Copy from service label)
7000 0600 0026 4129 8412

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

X
 Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8412

Postmark Here

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Recipient's Name (Please Print Clearly) (to be completed by mailer)
 Mr. John D. Baker, President
 Street, Apt. No., or PO Box No.
 155 East 21 St.
 City, State, ZIP+4
 Jacksonville, FL 32206



THE FLORIDA SENATE

Tallahassee, Florida 32399-1100

COMMITTEES:
Ethics and Elections,
Vice Chairman
Criminal Justice
Finance and Taxation
Governmental Oversight and Productivity
Natural Resources
Reapportionment - Subcommittee on Legislative
Apportionment and Redistricting

SENATOR ROD SMITH
5th District

July 9, 2001

RECEIVED
JUL 10 2001
ENVIRONMENTAL
PROTECTION DEPT

Secretary David Struhs
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399-3000

Dear Secretary Struhs:

I am in receipt of a letter from the Alachua County Commission Chair, David Newport, in which he outlines several points of concern he has regarding air and water quality regulation on both the State and Federal levels. Commissioner Newport has asked that I assist in resolving what he views as a serious lapse in keeping our natural resources free from contamination and insuring the safety of our citizens as a whole.

Specifically, the Commissioner is concerned with the absence of any consideration atmospheric discharges have on surface waters during any air permitting process. It is his view that the definition of "discharge" in the Clean Water Act needs to be expanded to include these particulates. Further, to require sources that are permitted under the Clean Air Act to demonstrate compliance with water quality standards.

Commissioner Newport also suggests a requirement that major stationary sources of pollution reduce, over time, the amount they discharge in order to keep their permit current. Finally, he points to a disconnect between State and Federal regulators, which, given the current Administrations in Washington and Tallahassee, a concerted effort might be undertaken to open up the lines of communication.

REPLY TO:

- 2727 NW 43rd Street, Suite 2A, Gainesville, Florida 32606 (352) 375-3555
- 220 Senate Office Building, 404 South Monroe Street, Tallahassee, Florida 32399-1100 (850) 487-5020

Legislature's Website: <http://www.leg.state.fl.us>

JOHN M. MCKAY
President

GINNY BROWN-WAITE
President Pro Tempore

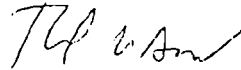
FAYE W. BLANTON
Secretary

DONALD SEVERANCE
Sergeant at Arms

Struhs Ltr.
Page Two

From my perspective, many of these points have merit. Therefore, I am asking for your input on these proposals. As Chief Environmental Regulator for our State, I know your opinion will have a great deal of impact during the discussion.

Sincerely,



Rod Smith

cc: Chairman David Newport
Randall Reid, County Manager
Chris Bird, Director of Environmental Protection
David Schwartz, Assitant County Attorney



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

July 2, 2001 (Replaces Letter of June 8, 2001)

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No.: 0010087-003-AC/PSD-FL-228A
Thompson S. Baker (Newberry) Cement Plant

Dear Mr. Baker:

We received a letter dated June 1, 2001 from Oertel, Hoffman, Fernandez & Cole, P.A. requesting a letter from the Department modifying the Draft Air Construction Permit Modification that we sent you on January 26. On June 8, 2001, we enclosed one copy of the revised Draft Air Construction Permit Modification for the Thompson S. Baker Cement plant on County Road 235, in Newberry, Alachua County.

Enclosed is a further revision of the Draft Air Construction Permit Modification. We have corrected the second footnote to Table II, Allowable Emissions, to reflect that the compliance demonstration with the 2.8 lb/ton limit for NO_x shall be submitted by Florida Rock by February 15, 2002 (rather than 2001). We also corrected page 3 of the draft permit modification to reflect Specific Condition 5 (rather than Specific Condition 6), Table II (Revised). We now show an expiration date of July 31, 2001 instead of June 30, 2001.

We understand that the changes in the enclosed Draft Air Construction Permit Modification were reviewed by Florida Rock and are acceptable to Florida Rock. The changes reflected in the enclosed Draft Permit Modification will represent our Intent to Issue upon your withdrawal of your requests for extension of time to file a petition. No additional public notice is required.

If you have any questions regarding this matter, please call Al Linero at 850/921-9523.

Sincerely,

C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/al

Enclosure

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Letter and DRAFT Air Construction Permit Modification were sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7/9/01 to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
W. Douglas Beason, Esq., DEP OGC
James J. Konish, Esq., FPLW*
Rob Luna, NCFGP*

Segundo J. Fernandez, Esq., OHF&C*
David Schwartz, Esq., Alachua County*
Arthur Saarinen*
Chair, Alachua County Commission*
Chris Bird, Alachua County EPD

Clerk Stamp

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Charlotta Hayes
(Clerk)

7/9/01
(Date)

DRAFT

Date

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No. 0010087-003-AC (PSD-FL-228A)
Newberry Cement Plant – Permit Modification

Dear Mr. Baker:

The Department reviewed your July 17, 2000 request and the additional information subsequently submitted to extend and modify the referenced construction permit.

The existing permit also requires that the Department set certain emission limits based on test data. The Department has received sufficient data to set the final sulfuric acid mist limit, but does not yet have sufficient data to set final sulfur dioxide and beryllium limits.

The existing permit is hereby modified as follows:

EXPIRATION DATE

The expiration date is hereby extended until July 31, 2001. All physical construction required to make cement and to conduct initial testing is complete. This permit modification authorizes further work only for replacement or addition of continuous emission monitoring equipment and conversion of the precombustor to a Low NO_x Multi-Stage Combustion (MSC) calciner to meet the lower nitrogen oxides emission limit as described in Table II of the original permit. All additional construction related to installation of the MSC shall be completed by December 31, 2001 under the compliance plan of the Title V Permit.

SPECIFIC CONDITION 4 (First Paragraph)

Fuels fired in the pyroprocessing system (kiln and combustor) shall not exceed a total maximum heat input of 364 MMBtu/hr and shall consist only of coal, (usage rate shall not exceed 14.0 TPH), whole tires, propane, and unused No. 2 fuel oil which may also be fired in the Raw Mill Air Heater. Propane usage is limited to startup and in lieu of tires in the first stage of the MSC. All fuel usage shall be in compliance with the following limits and conditions: [Rule 62-210.200(225), F.A.C.]

SPECIFIC CONDITION 4.b. (Revised)

Whole tires may be used as an alternate fuel. Such tires shall be fed into the kiln system at the transition section between the base of the precalciner and the point where gases exit the kiln. The tire feeder mechanism shall ~~have a double airlock, vertical and horizontal guillotine gates, and a ram~~ consist of a rotary feeder, which seals the tire entry point from the atmosphere. The permitted feed rate shall not exceed 109.2 MMBtu/hr (30% of total kiln fuel input) or 4.2 TPH (approximately 400 tires per hour) and 36,792 TPY. Before initiating tire firing, the gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum of 1,440 degrees F for at least one hour.

SPECIFIC CONDITION 5, TABLE I (Revised)

Attached Table I is hereby modified to reflect the following as-constructed details:

- Dust Collector E-29 is eliminated as the dust from that transfer point and is now vented back into the kiln/raw mill ESP (collector E-19 and Emission Point E-21).
- Dust Collector M-07 is eliminated because of the redesign of the discharge system of the clinker storage silos.
- Dust Collector N-14 is renamed N-19, and still serves the same function in the finish mill.
- Dust Collector Q-27 is eliminated by inter-venting the four Portland cement silos through a single dust collector. A separate baghouse still exists on the cement silo used for masonry cement.

SPECIFIC CONDITION 5, TABLE II (Revised)

The final H₂SO₄ emission limit and the compliance details for the lower NO_x limit of 2.8 pounds per ton of clinker are shown in Revised Table II.

SPECIFIC CONDITION 6 (Revised)

With respect to conducting manual stack tests, the relevant language in Specific Condition 6 is modified as follows:

The manual stack tests shall be conducted while firing both primary fuels at permitted capacity (70 to 100% coal and 0 to 30% tires) and while all continuous monitoring systems are functioning properly, and with all process units operating at their permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the units may be tested at less than 90% of the maximum operating rate allowed by the permit. In this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the units are so limited, then operation at higher capacities (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit.

[Rule 62-297.310(2)(b), F.A.C.]

If the kiln is tested while firing less than 30% tires, subsequent operation is limited to 110% of the percentage of tires burned during the test, not to exceed 30% of the total heat input. Once the kiln is so limited, then operation at greater tire burning rates (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. Operation at greater tire burning rates (with prior notification provided to the Department) is also allowed for no more than 45 consecutive days in conjunction with installation and testing of the MSC. [Rule 62-297.310(2)(b), F.A.C.]

SPECIFIC CONDITION 6.a. (New)

Permittee shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) in the kiln/raw mill stack to measure and record the emissions of total hydrocarbons (THC as propane) to provide reasonable assurance that the facility will continue to meet the VOC emission limit established by permit. The CEMS shall be installed, certified, operated and maintained in accordance with Performance Specification 8A of Appendix B, 40 CFR 60. The CEMS shall be used in conjunction with a flow rate sensor certified in accordance with Performance Specification 6 of Appendix B, 40 CFR 60 to calculate THC emission rates. The owner or operator shall report no later than the 15th day following each calendar quarter a summary of the 30-day rolling average THC emission rates reported by the CEMS for the days of that calendar quarter to the Department's Northeast District Office. The daily averages used to compute the 30-day rolling averages shall also be provided in the summary. These results should be reported as pounds per hour of THC, and pounds of THC per ton of clinker. [Rule 62-4.070, F.A.C.]

SPECIFIC CONDITION 6.b. (New)

Permittee shall conduct quarterly beryllium tests on emissions from the kiln/raw mill stack by June 30, September 30, and December 31, 2001 using the methods described in Specific Condition 6. Test reports shall be submitted to the Department's Northeast District Office and the Bureau of Air Regulation in Tallahassee within 45 days after conducting the tests.
[Rules 62-212.400 and 62-4.070, F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Chris Kirts, DEP NED
Pat Reynolds, DEP NED, Gainesville
Chair, Alachua County Commission*
Chris Bird, Alachua County EPD

Segundo J. Fernandez, Esq., OHF&C*
W. Douglas Beason, Esq., DEP OGC
David Schwartz, Esq., Alachua County*
James J. Konish, Esq., FPLW*
Arthur Saarinen*
Rob Luna, NCFGP*

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

(Clerk)

(Date)

Table I Allowable Opacity Limitations
Florida Rock Industries

Stack #	Description	Grain Loading	OPACITY
Emission Unit 1: Raw Material Process Rate = 1,211,250 TPY Processed			
Fugitive	Material Processing		10
Fugitive	Handling and Storage		10
Fugitive	Crusher		15
Emission Unit 2: Raw Mill System Process Rate = 212 TPH Raw Materials			
E-28	Recycle dust + raw meal to homogenization silo	0.01 gr/dscf	5
G-07	Recycle dust + raw meal to homogenization silo	0.01 gr/dscf	5
H-08	Raw meal + recycle dust to preheater	0.01 gr/dscf	5
Emission Unit 3: Kiln System Process Rate = 364 MMBTU/heat input			
E-21	Kiln Operations (ESP)		10
E-21	In-process fuel: coal		10
E-21	In-process fuel: tires		10
	Tires (30 % of total heat input)		
Emission Unit 4: Clinker Handling Process Rate = 95.83 TPH Clinker			
L-03	Clinker cooler discharge and breaker	0.01 gr/dscf	5
L-06	Clinker into clinker silos	0.01 gr/dscf	5
K-15	Clinker Cooler (ESP)		10
Emission Unit 5: Finish Grinding Operations Process Rate = 136 TPH Cement Output			
M-08	Clinker to finish mill	0.01 gr/dscf	5
N-09	Finish mill air separator	0.01 gr/dscf	5
N-12	Finish mill	0.01 gr/dscf	5
N-19	Cement handling in finish mill	0.01 gr/dscf	5
Q-25	Cement storage silos	0.01 gr/dscf	5
Q-26	Cement storage silos	0.01 gr/dscf	5
Emission Unit 6: Cement Handling Process Rate = 500 TPH Cement Unloading			
Q-14	Cement silo loadout	0.01 gr/dscf	5
Q-17	Cement silo loadout	0.01 gr/dscf	5
Q-21	Cement silo loadout	0.01 gr/dscf	5
R-12	Cement bagging operation	0.01 gr/dscf	5
Emission Unit 7: Coal Handling and Grinding Process Rate = 14 TPH Pulverized Coal			
S-17	Coal Mill	0.01 gr/dscf	5
S-21	Pulverized coal storage bin	0.01 gr/dscf	5
Fugitive	Coal Handling and Storage		5/20

Table II
Allowable Emissions
Florida Rock Industries

Pollutant	Bact Emission Limit		Emission Rate *		Basis
	lb/ton clinker	lb/ton dry feed	lb/hr	ton/yr	
PM (kiln)	0.31	0.20	30.00	110.50	BACT
PM ₁₀ (kiln)	0.26	0.17	25.50	93.93	BACT
PM (cooler)	0.16	0.10	14.99	55.70	BACT-NSPS
PM ₁₀ (cooler)	0.13	0.09	12.71	47.34	BACT
SO ₂ (kiln) ⁺	0.28	0.18	28.82	108.55	BACT
NO _x (kiln)**	2.80	1.80	268.30	1018.00	BACT
H ₂ SO ₄ (kiln)	<u>0.0025</u>	<u>0.0016</u>	<u>0.25</u>	<u>1</u>	BACT
CO (kiln)	3.60	2.30	346.38	1288.60	BACT
VOC (kiln)	0.12	0.08	11.55	42.90	BACT
Beryllium	TO BE DETERMINED BY FUTURE STACK TESTS				BACT

Notes:

- * The kiln emission rate includes fuel oil combustion emissions from the raw mill air heater.
- ** After startup and until December 31, 2001, the kiln shall not exceed a NO_x limit of 3.8 lb/ton clinker and 2.8 lb/ton clinker thereafter (30-day rolling average). A compliance demonstration with the 2.8 lb/ton limit for the first 30-day period following December 31 (January 1-30, 2002) shall be submitted by Florida Rock to the Northeast District Office by February 15, 2002. The Department may revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on continuous emission monitoring data covering the period January 1-March 31, 2002 to be submitted by Florida Rock to the Department's Northeast District by April 15, 2002.
- + The Department may revise the SO₂ limit to less than 0.28 lb/ton clinker based on compliance test and continuous monitoring data.



Board of County Commissioners

ALACHUA COUNTY BOARD OF COUNTY COMMISSIONERS

P.O. Box 2877 • Gainesville, Florida 32602-2877
Tel. (352) 374-5210 • Fax (352) 338-7363
1-800-491-4496 (toll free) • Suncom 651-5210
Commissioners' E-Mail: bocc@co.alachua.fl.us
Home Page: www.co.alachua.fl.us

Commission

Dave Newport
Chair

Robert Hutchinson
Vice Chair

Mike Byerly

Rodney J. Long

Penelope Wheat

Administration

Randall H. Reid
County Manager

July 2, 2001

The Honorable Rod Smith
2727 NW 43rd Street, Ste. 2A
Gainesville, FL 32606

Re: *Gaps in Regulation and Permitting of Air Pollution Sources*

Dear Senator Smith:

Over the past few years, the local officials, staff, and citizens of Alachua County have learned a great deal about the air pollution permitting process in effort to protect public health and welfare within the County and region. It has become all too obvious through the experiences with the permitting of the Florida Rock Industries cement plant in Alachua County and the Suwannee American cement plant in our neighboring Suwannee County that some serious gaps exist in the state and federal regulatory and permitting processes, allowing for the emission of unnecessarily high levels of harmful pollutants.

Most significantly, the effects of atmospheric deposition of air pollutants upon surface waters, even those designated for special protection, are not considered in the air permitting process. This is so even for mercury emissions that inevitably are deposited to nearby surface waters and bioaccumulate in fish that people catch and eat. Residents of Alachua County and the north-central Florida region are particularly concerned about the atmospheric mercury deposition issue due to documented mercury contamination in fish from the Santa Fe River, designated an "Outstanding Florida Water". It is evident that there is no communication or input being provided by those persons in the USEPA and State of Florida Department of Environmental Protection charged with protecting water quality to the people who review and issue the air permits. The legal or regulatory justification given for this "disconnect" between water and air quality protection efforts is that the atmospheric deposition of air pollutants to surface waters is not considered a "discharge" under the Clean Water Act. The National Ambient Air Quality Standards with which the regulatory agency air permitting engineers and staff concern themselves are directed only at regional air quality, and not impacts on local water quality. Until the connection is made that "what goes up must come down," as was ultimately acknowledged in the case of sulfuric deposition in the form of acid rain, local water quality and public health will continue to be placed at risk by the permitting of major stationary sources of air pollution. It is, therefore, the strong and urgent recommendation



July 2, 2001

Page 2

of the Alachua County Board of County Commissioners that federal and state legislation be passed to broaden the definition of "discharge" under the Clean Water Act, and to require sources that are permitted under the Clean Air Act to demonstrate compliance with water quality standards.

Another substantial gap in the air permitting process is that for certain pollutants for which no specific emission limiting standard has been adopted, permits are being issued that arbitrarily set a maximum level of emissions that falls just below the regulatory threshold for Prevention of Significant Deterioration (PSD) review. Again, using mercury as an example, permits are being issued for 199 lbs. per year of mercury emissions, just below the PSD threshold of 200 lbs., even though natural gas or lower mercury-content coal is readily available to reduce mercury emissions to a mere fraction of such inflated levels. Ironically, if the projected emissions exceeded the PSD threshold by even one pound, the Best Available Control Technology (BACT) emission limitation would be required to achieve such reductions. But in the case of emissions that do not trip the PSD threshold, the air permitting engineers and staff apparently do not even attempt to encourage pollution prevention or promote readily achievable reductions in emissions, perhaps on account of a perceived lack of authority. It is, therefore, also recommended by the Alachua County Board of County Commissioners that federal and state legislation and programs be adopted to require pollution prevention for major stationary sources of air pollution so as to attain achievable reductions in emissions, rather than merely setting emission limits by default at or just below arbitrary regulatory thresholds for regional ambient air quality.

Your efforts to safeguard public health and environmental protection from slipping through these illogical gaps in the air pollution regulatory and permitting process will be greatly appreciated.

Yours truly,



Dave Newport, Chair
Alachua County Commission

DCS:eeh

file:chr01.068

cc: Randall Reid, County Manager
Chris Bird, Director of Environmental Protection
David Schwartz, Assistant County Attorney
Howard Rhodes, FDEP, 3900 Commonwealth Blvd., Tallahassee, 32399
Ernie Frey, FDEP, NE District, 7825 Baymeadows Way, Suite B200, Jacksonville 32256



Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

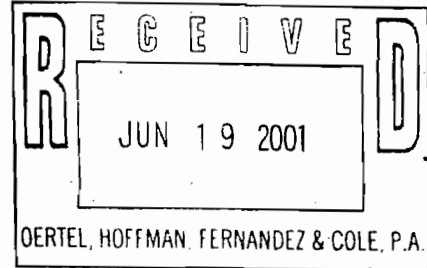
David B. Struhs
Secretary

June 12, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No.: 0010087-002-AV
Thompson S. Baker (Newberry) Cement Plant



Dear Mr. Baker:

We received a letter dated June 1, 2001 from Oertel, Hoffman, Fernandez & Cole requesting a letter from the Department modifying the Draft Title V Permit Modification that we sent you on January 26. Enclosed is one copy of the revised Draft Title V Permit Modification for the Thompson S. Baker Cement Plant on County Road 235, in Newberry, Alachua County.

We understand that the changes in the enclosed Draft Air Construction Permit Modification were reviewed by Florida Rock and are acceptable to Florida Rock. The changes reflected in the enclosed Draft Permit Modification will represent our Intent to Issue upon your withdrawal of your requests for extension of time to file a petition. No additional public notice is required.

If you have any questions regarding this matter, please call me at (904) 448-4310 extension 235.

Sincerely,

Christopher L. Kirts, P.E.
District Air Program Administrator

CLK/ka

Enclosure

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Letter and DRAFT Air Title V Permit Modification were sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6/14/01 to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Rob Luna, NCFGP*
Pat Reynolds, DEP Gainesville
W. Douglas Beason, Esq., DEP OGC
James J. Konish, Esq., FPLW*

Segundo J. Fernandez, Esq., OHF&C*
David Schwartz, Esq., Alachua County*
Arthur Saarinen*
Chair, Alachua County Commission*
Chris Bird, Alachua County EPD
John Koogler, P.E.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to §120.82 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Norothy D. Berefield 6/14/01
Clerk Date

"More Protection, Less Process"

Printed on recycled paper.



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
June 8, 2001

David B. Struhs
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No.: 0010087-003-AC/PSD-FL-228A
Thompson S. Baker (Newberry) Cement Plant

Dear Mr. Baker:

We received a letter dated June 1, 2001 from Oertel, Hoffman, Fernandez & Cole requesting a letter from the Department modifying the Draft Air Construction Permit Modification that we sent you on January 26. Enclosed is one copy of the revised Draft Air Construction Permit Modification for the Thompson S. Baker Cement Plant on County Road 235, in Newberry, Alachua County.

We understand that the changes in the enclosed Draft Air Construction Permit Modification were reviewed by Florida Rock and are acceptable to Florida Rock. The changes reflected in the enclosed Draft Permit Modification will represent our Intent to Issue upon your withdrawal of your requests for extension of time to file a petition. No additional public notice is required.

If you have any questions regarding this matter, please call AJ Linero at 850/921-9523.

Sincerely,

C.H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/al

Enclosure

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Letter and DRAFT Air Construction Permit Modification were sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 6/13/01 to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
W. Douglas Beason, Esq., DEP OGC
James J. Konish, Esq., FPLW*
Rob Luna, NCFGP*

Segundo J. Fernandez, Esq., OHF&C*
David Schwartz, Esq., Alachua County*
Arthur Saarinen*
Chair, Alachua County Commission*
Chris Bird, Alachua County EPD

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Charlotte J. Hayes 6/13/01
(Clerk) (Date)

"More Protection, Less Process"

Printed on recycled paper.

DRAFT

Date

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No. 0010087-003-AC (PSD-FL-228A)
Newberry Cement Plant -- Permit Modification

Dear Mr. Baker:

The Department reviewed your July 17, 2000 request and the additional information subsequently submitted to extend and modify the referenced construction permit.

The existing permit also requires that the Department set certain emission limits based on test data. The Department has received sufficient data to set the final sulfuric acid mist limit, but does not yet have sufficient data to set final sulfur dioxide and beryllium limits.

The existing permit is hereby modified as follows:

EXPIRATION DATE

The expiration date is hereby extended until June 30, 2001. All physical construction required to make cement and to conduct initial testing is complete. This permit modification authorizes further work only for replacement or addition of continuous emission monitoring equipment and conversion of the precombustor to a Low NO_x Multi-Staged Combustion (MSC) calciner to meet the lower nitrogen oxides emission limit as described in Table II of the original permit. All additional construction related to installation of the MSC shall be completed by December 31, 2001 under the compliance plan of the Title V Permit.

SPECIFIC CONDITION 4 (First Paragraph)

Fuels fired in the pyroprocessing system (kiln and combustor) shall not exceed a total maximum heat input of 364 MMBtu/hr and shall consist only of coal, (usage rate shall not exceed 14.0 TPH), whole tires, propane, and unused No. 2 fuel oil which may also be fired in the Raw Mill Air Heater. Propane usage is limited to startup and in lieu of tires in the first stage of the MSC. All fuel usage shall be in compliance with the following limits and conditions: [Rule 62-210.200(225), F.A.C.]

SPECIFIC CONDITION 4.b. (Revised)

Whole tires may be used as an alternate fuel. Such tires shall be fed into the kiln system at the transition section between the base of the precalciner and the point where gases exit the kiln. The tire feeder mechanism shall ~~have a double airlock, vertical and horizontal guillotine gates, and a ram~~ consist of a rotary feeder, which seals the tire entry point from the atmosphere. The permitted feed rate shall not exceed 109.2 MMBtu/hr (30% of total kiln fuel input) or 4.2 TPH (approximately 400 tires per hour) and 36,792 TPY. Before initiating tire firing, the gases exiting the kiln ahead of the calciner burner shall be maintained at a minimum of 1,440 degrees F for at least one hour.

SPECIFIC CONDITION 5, TABLE I (Revised)

Attached Table I is hereby modified to reflect the following as-constructed details:

- Dust Collector E- 29 is eliminated as the dust from that transfer point and is now vented back into the kiln/raw mill ESP (collector E-19 and Emission Point E-21).
- Dust Collector M-07 is eliminated because of the redesign of the discharge system of the clinker storage silos.
- Dust Collector N-14 is renamed N-19, and still serves the same function in the finish mill.
- Dust Collector Q-27 is eliminated by inter-venting the four Portland cement silos through a single dust collector. A separate baghouse still exists on the cement silo used for masonry cement.

SPECIFIC CONDITION 6 (Revised)

With respect to conducting manual stack tests, the relevant language in Specific Condition 6 is modified as follows:

The manual stack tests shall be conducted while firing both primary fuels at permitted capacity (70 to 100% coal and 0 to 30% tires) and while all continuous monitoring systems are functioning properly, and with all process units operating at their permitted capacity. Permitted capacity is defined as 90-100% of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the units may be tested at less than 90% of the maximum operating rate allowed by the permit. In this case, subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the units are so limited, then operation at higher capacities (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit.

[Rule 62-297.310(2)(b), F.A.C.]

If the kiln is tested while firing less than 30% tires, subsequent operation is limited to 110% of the percentage of tires burned during the test, not to exceed 30% of the total heat input. Once the kiln is so limited, then operation at greater tire burning rates (with prior notification provided to the Department) is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the permitted capacity in the permit. Operation at greater tire burning rates (with prior notification provided to the Department) is also allowed for no more than 45 consecutive days in conjunction with installation and testing of the MSC. [Rule 62-297.310(2)(b), F.A.C.]

SPECIFIC CONDITION 6, TABLE II (Revised)

The final H₂SO₄ emission limit and the compliance details for the lower NO_x limit of 2.8 pounds per ton of clinker are shown in Revised Table II.

SPECIFIC CONDITION 6.a. (New)

Permittee shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) in the kiln/raw mill stack to measure and record the emissions of total hydrocarbons (THC as propane) to provide reasonable assurance that the facility will continue to meet the VOC emission limit established by permit. The CEMS shall be installed, certified, operated and maintained in accordance with Performance Specification 8A of Appendix B, 40 CFR 60. The CEMS shall be used in conjunction with a flow rate sensor certified in accordance with Performance Specification 6 of Appendix B, 40 CFR 60 to calculate THC emission rates. The owner or operator shall report no later than the 15th day following each calendar quarter a summary of the 30-day rolling average THC emission rates reported by the CEMS for the days of that calendar quarter to the Department's Northeast District Office. The daily averages used to compute the 30-day rolling averages shall also be provided in the summary. These results should be reported as pounds per hour of THC, and pounds of THC per ton of clinker. [Rule 62-4.070, F.A.C.]

SPECIFIC CONDITION 6.b. (New)

Permittee shall conduct quarterly beryllium tests on emissions from the kiln/raw mill stack by June 30, September 30, and December 31, 2001 using the methods described in Specific Condition 6. Test reports shall be submitted to the Department's Northeast District Office and the Bureau of Air Regulation in Tallahassee within 45 days after conducting the tests.

[Rules 62-212.400 and 62-4.070, F.A.C.]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.

Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on _____ to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Chris Kirts, DEP NED
Pat Reynolds, DEP NED, Gainesville
Chair, Alachua County Commission*
Chris Bird, Alachua County EPD

Segundo J. Fernandez, Esq., OHF&C*
W. Douglas Beason, Esq., DEP OGC
David Schwartz, Esq., Alachua County*
James J. Konish, Esq., FPLW*
Arthur Saarinen*
Rob Luna, NCFGP*

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED,
on this date, pursuant to §120.52, Florida Statutes,
with the designated Department Clerk, receipt of
which is hereby acknowledged.

(Clerk)

(Date)

Table II
Allowable Emissions
Florida Rock Industries

Pollutant	Bact Emission Limit		Emission Rate *		Basis
	lb/ton clinker	lb/ton dry feed	lb/hr	ton/yr	
PM (kiln)	0.31	0.20	30.00	110.50	BACT
PM ₁₀ (kiln)	0.26	0.17	25.50	93.93	BACT
PM (cooler)	0.16	0.10	14.99	55.70	BACT-NSPS
PM ₁₀ (cooler)	0.13	0.09	12.71	47.34	BACT
SO ₂ (kiln) ⁺	0.28	0.18	28.82	108.55	BACT
NO _x (kiln)**	2.80	1.80	268.30	1018.00	BACT
H ₂ SO ₄ (kiln)	0.0025	0.0016	0.25	1	BACT
CO (kiln)	3.60	2.30	346.38	1288.60	BACT
VOC (kiln)	0.12	0.08	11.55	42.90	BACT
Beryllium	TO BE DETERMINED BY FUTURE STACK TESTS				BACT

Notes:

- * The kiln emission rate includes fuel oil combustion emissions from the raw mill air heater.
- ** After startup and until December 31, 2001, the kiln shall not exceed a NO_x limit of 3.8 lb/ton clinker and 2.8 lb/ton clinker thereafter (30-day rolling average). A compliance demonstration with the 2.8 lb/ton limit for the first 30-day period following December 31 (January 1-30, 2002) shall be submitted by Florida Rock to the Northeast District Office by February 15, 2001. The Department may revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on continuous emission monitoring data covering the period January 1-March 31, 2002 to be submitted by Florida Rock to the Department's Northeast District by April 15, 2002.
- + The Department may revise the SO₂ limit to less than 0.28 lb/ton clinker based on compliance test and continuous monitoring data.

**Table I Allowable Opacity Limitations
Florida Rock Industries**

Stack #	Description	Grain Loading	OPACITY
Emission Unit 1: Raw Material Process Rate = 1,211,250 TPY Processed			
Fugitive	Material Processing		10
Fugitive	Handling and Storage		10
Fugitive	Crusher		15
Emission Unit 2: Raw Mill System Process Rate = 212 TPH Raw Materials			
E-28	Recycle dust + raw meal to homogenization silo	0.01 gr/dscf	5
G-07	Recycle dust + raw meal to homogenization silo	0.01 gr/dscf	5
H-08	Raw meal + recycle dust to preheater	0.01 gr/dscf	5
Emission Unit 3: Kiln System Process Rate = 364 MMBTU/heat input			
E-21	Kiln Operations (ESP)		10
E-21	In-process fuel: coal		10
E-21	In-process fuel: tires		10
	Tires (30 % of total heat input)		
Emission Unit 4: Clinker Handling Process Rate = 95.83 TPH Clinker			
L-03	Clinker cooler discharge and breaker	0.01 gr/dscf	5
L-06	Clinker into clinker silos	0.01 gr/dscf	5
K-15	Clinker Cooler (ESP)		10
Emission Unit 5: Finish Grinding Operations Process Rate = 136 TPH Cement Output			
M-08	Clinker to finish mill	0.01 gr/dscf	5
N-09	Finish mill air separator	0.01 gr/dscf	5
N-12	Finish mill	0.01 gr/dscf	5
N-19	Cement handling in finish mill	0.01 gr/dscf	5
Q-25	Cement storage silos	0.01 gr/dscf	5
Q-26	Cement storage silos	0.01 gr/dscf	5
Emission Unit 6: Cement Handling Process Rate = 500 TPH Cement Unloading			
Q-14	Cement silo loadout	0.01 gr/dscf	5
Q-17	Cement silo loadout	0.01 gr/dscf	5
Q-21	Cement silo loadout	0.01 gr/dscf	5
R-12	Cement bagging operation	0.01 gr/dscf	5
Emission Unit 7: Coal Handling and Grinding Process Rate = 14 TPH Pulverized Coal			
S-17	Coal Mill	0.01 gr/dscf	5
S-21	Pulverized coal storage bin	0.01 gr/dscf	5
Fugitive	Coal Handling and Storage		5/20

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John D. Baker, President
 Florida Rock Industries, Inc.
 155 East 21 Street
 Jacksonville, Florida 32206

2. Article Number (Copy from service label)

7000 0600 0026 4129 8542

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery
 6/15/01

C. Signature

X [Handwritten Signature]

- Agent
- Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

**U.S. Postal Service
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 (Domestic Mail Only; No Insurance Coverage Provided)**

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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

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Rec Mr. John D. Baker, President
 Str Florida Rock Industries, Inc.
 155 East 21 Street
 City Jacksonville, Florida 32206

PS

or Instructions

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

301 SOUTH BRONOUGH STREET
SUITE 500
TALLAHASSEE, FLORIDA 32301

(850) 521-0700
FAX (850) 521-0720

MAILING ADDRESS:
POST OFFICE BOX 1110
TALLAHASSEE, FLORIDA 32302-1110

<http://www.ohfc.com>

TIMOTHY P. ATKINSON
JEFFREY BROWN
M. CHRISTOPHER BRYANT
C. ANTHONY CLEVELAND
TERRY COLE
SEGUNDO J. FERNANDEZ
SCOTT W. FOLTZ
KENNETH F. HOFFMAN
CHRISTOPHER D. JOHNSTON
KENNETH G. OERTEL
PATRICIA A. RENOVITCH

RECEIVED

JUN 04 2001

June 1, 2001

BUREAU OF AIR REGULATION

VIA FACSIMILE AND U.S. MAIL

Douglas W. Beason, Assistant General Counsel
Office of General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, Florida 32399-3000

Re: Request for Confirmation Letters
Draft Modified Air Construction Permit Modification: FDEP File No.: 0010087-003-AC/PSD-FL-228-A
Draft Title V Permit No.: 0010087-002-AV
Thompson S. Baker Cement Plant, Newberry, Alachua County, Florida

Dear Doug:

As you know, we represent Florida Rock Industries, Inc. with respect to the Air Construction Permit and Title V Permit for the above-referenced facility. Pursuant to my telephone conversation with you on Tuesday, May 22, 2001, regarding the modifications to the proposed agency actions on the above-referenced permit contained in your e-mails dated May 11, 2001 (Air Construction Permit Modification) and dated May 22, 2001 (Title V Permit), the company has reviewed the changes and finds them acceptable. Furthermore, Florida Rock Industries' consultant, Dr. John Koogler, spoke with Chris Kirts of the DEP-Jacksonville office today and finalized a number of minor changes to the descriptive wording of the proposed Title V permit. Consequently, I hereby request the Department send the company a letter modifying the Department's proposed agency action dated January 26, 2001 on the Air Construction Permit modification, and another letter modifying the Department's proposed agency action dated January 26, 2001 on the Title V Modification, reflecting the changes contained in your e-mails of May 11, 2001 and May 22, 2001 respectively and the minor changes worked out by Dr. Koogler with Mr. Kirts on May 31, 2001.

Upon receipt of the Department's letters modifying the proposed agency actions referenced above, I will send you a letter withdrawing the company's request for an extension of time to file

Douglas W. Beason, Assistant General Counsel
June 1, 2001
Page 2

a petition for administrative hearing with respect to the draft Air Construction Permit Modification and with respect to the draft Title V Permit. Please note that Florida Rock Industries, Inc. does not waive its right to challenge any further changes or modifications to the permits beyond those specifically discussed above.

Thank you for your consideration. If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Segundo J. Fernandez', with a long, sweeping flourish extending to the right.

Segundo J. Fernandez

c: Kirby B. Green, III
Howard Rhodes
C. H. Fancy, P.E.
Al Linero, P.E.
Chris Kirts
Fred W. Cohrs
John Koogler, Ph.D., P.E.
Timothy P. Atkinson



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 ■ FAX/377-7158

187-00-09
May 9, 2001

RECEIVED

MAY 10 2001

BUREAU OF AIR REGULATION

Via Fax & USPS

Mr. Al Linero
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: Florida Rock Industries
Comments on Modified Permits 0010087-003-AC/PSD-FL-228A
as Received by Email Dated May 3, 2001.

Dear Al:

I have had the opportunity to review the above captioned permit modifications that you forward to me by email on May 4, 2001. I appreciate the opportunity to review the modifications and offer the following comments:

1. **EXPIRATION DATES**

The extension of the expiration date until June 30, 2001 is acceptable.

The date of December 31, 2001 for the completion of construction of all items related to the multi-stage combustor is acceptable. In my opinion, there is no need for the requirement for "short-term compliance for NO_x" as the above captioned permit (and original Permit AC01-267311) specifies that compliance with the NO_x emission standard is to be demonstrated by CEMS; there is no previous permit requirement for "short-term NO_x compliance testing." I suggest that the short-term compliance test reference be deleted, and to assure there is no confusion with the construction and compliance demonstration that will be authorized under the Title V permit, the following is suggested:

All additional construction related to the installation of the MSC ~~and short term compliance testing for NO_x~~ shall be completed by December 31, 2001, under the compliance plan of the Title V Permit.

The date of March 31, 2002 for completion of compliance testing related to the operation of the MSC and the determination of the final long-term NO_x emission limit is acceptable.

2. **SPECIFIC CONDITION 4** (First paragraph)

The proposed language is acceptable.

3. **SPECIFIC CONDITION 6** (Modified)

The proposed language is acceptable.

4. **SPECIFIC CONDITION 6, TABLE II** (Revised)

The final sulfuric acid mist emission limit included in Table II (Revised) is acceptable.

It is my understanding that the final date for compliance with the NO_x emission limit of 2.8 pounds per ton of clinker as referenced in Table II (Revised) has been corrected to March 31, 2002.

5. **SPECIFIC CONDITION 6.a** (New)

Based upon our telephone conversations and my review of the proposed condition, I am suggesting the following language for SPECIFIC CONDITION 6.a.

SPECIFIC CONDITION 6.a. (New)

Permittee shall install, calibrate, maintain and operate a continuous emission monitoring system (CEMS) in the kiln/raw mill stack to measure and record the emissions of total hydrocarbons (THC as propane) to provide reasonable assurance that the facility will continue to meet the VOC emission limit established by permit.

This statement is added to specify that the THC CEMS is installed only to provide reasonable assurance of compliance with the VOC emission limit established by permit. This is in accordance with our telephone conversations and the basic agreement between Florida Rock and the Department in establishing conditions for the voluntary installation of the THC CEMS.

The remainder of Specific Condition 6.a. is acceptable, except that FRI requests that the quarterly reports be due the 15th day following the end of each calendar quarter. This will provide FRI with a bit more flexibility in providing the information to the Department. This reporting requirement is still much shorter than the 30 day reporting requirement established by Federal NSPS.

5. **SPECIFIC CONDITION 6.b** (New).

This condition is acceptable.

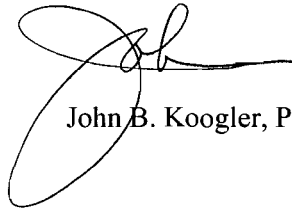
Mr. Al Linero
May 9, 2001

Page 3

I appreciate the opportunity to comment on these proposed conditions. If there are any questions regarding these comments, please call me at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK/jm

cc: Fred Cohrs, FRI
Cary Cohrs, FRI
George Townsend, FRI
Segundo Fernandez, OHFC
Tim Atkinson, OHFC



OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

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SCOTT W. FOLTZ
KENNETH F. HOFFMAN
CHRISTOPHER D. JOHNSTON
KENNETH G. OERTEL
PATRICIA A. RENOVITCH

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MAY 07 2001

May 4, 2001

VIA HAND DELIVERY

BUREAU OF AIR REGULATION

Douglas W. Beason, Assistant General Counsel
Office of General Counsel
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Re: Fourth Request for Extension of Time to File Petition for Administrative Hearing
Draft Modified Air Construction Permit Modification: FDEP File No.: 0010087-003-
AC/PSD-FL-228-A
Draft Title V Permit No.: 0010087-002-AV
Thompson S. Baker Cement Plant, Newberry, Alachua County, Florida

Dear Doug:

As you know, we represent Florida Rock Industries, Inc. with respect to the Air Construction Permit and Title V Permit for the above-referenced facility. The company received the Department's Intent to Issue the draft Air Construction Permit Modification and the draft Title V Permit on January 30, 2001. On February 8, 2001, and again on March 1, 2001, we requested extensions of time to file a petition for administrative hearing on both draft permits, the air construction permit and the Title V permits. The Department has not acted on any of Florida Rock's previous extension requests regarding these permits. As such, the extensions have remained effective, and this request is timely made. Since that time, Florida Rock has continued to exchange information with the Department concerning the draft Modified Air Construction Permit and draft Title V Permit, and appreciates the cooperative nature of such discussions.

On behalf of Florida Rock Industries, Inc., and pursuant to Rule 28-106.111, Florida Administrative Code, we hereby file this request for an extension of time to file a petition for administrative hearing with respect to the draft Air Construction Permit Modification and with respect to the draft Title V Permit, both referenced above, up to and including Tuesday, July 31, 2001. The applicant needs additional time to review the draft permits, which are quite lengthy and detailed, and the Department needs additional time to

Douglas W. Beason, Assistant General Counsel
May 4, 2001
Page 2

formulate language to address the matters that remain under discussion.

We understand that you will be in contact with Chris Kirts and Al Linero concerning this third extension request, and that you will call me following your discussions with them.

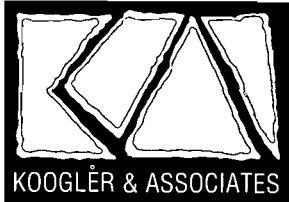
Thank you for your consideration. If you have any questions, please do not hesitate to call me.

Sincerely,

Segundo J. Fernandez

F:\Document\TPALTR\FRI Petition Extension Requests4.wpd

- c: Kirby B. Green, III
- Howard Rhodes
- C. H. Fancy, P.E.
- Al Linero, P.E.
- Chris Kirts
- Fred W. Cohrs
- John Koogler, Ph.D., P.E.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
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352/377-5822 ■ FAX/377-7158

187-99-08
April 6, 2001

RECEIVED
APR 10 2001

BUREAU OF AIR REGULATION
FAX: 850-922-6979
and VIA USPS

Mr. John Reynolds
Florida Department of
Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road, MS 5505
Tallahassee, Florida 32399-2400

Subject: Florida Rock Industries, Inc.
Comments on Original Air Construction Permit No. AC01-267311/PSD-FL-228
and Draft Title V Permit No. 0010087-002-AV

Dear Mr. Reynolds:

I would like to request some additional administrative changes to the above-captioned permits as we are in the process of amending both these permits. It has recently been brought to my attention that certain changes in the final design of the Florida Rock Cement Plant eliminated the need for three of the small bag house dust collectors that were included in the original plant design. Additionally, the final design also resulted in the renaming of another of the small bag house dust collectors. The changes were:

1. Dust Collector E-29 was eliminated as the dust from that transfer point is now vented back into the kiln/raw mill ESP (Collector E-19) for control.
2. Dust Collector M-07 was eliminated because of the redesign of the discharge system of the clinker storage silos.
3. Dust Collector N-14 was renamed N-91, and still serves the same function in the finish mill.
4. Dust Collector Q-27 was eliminated by inter-venting the four Portland cement silos through a single dust collector. A separate bag house still exists on the cement silo used for masonry cement.

Visible emission test results reported to the Department have demonstrated compliance with all visible emission standards, even with these changes.

The three dust collectors eliminated and the dust collector renamed are identified in the original Air Construction Permit in Table 1, Allowable Opacity Limitations, as:

1. E-29 Recycled Dust Airlift
2. M-07 Clinker to Finish Mill
3. N-14 Cement Handling and Finish Mill
4. Q-27 Cement Storage Silos

This is the only reference to these dust collectors in the Air Construction Permit. The appropriate notation should be made in Amended Air Construction Permit 0010087-003-AC/PSD-FL-28A recently drafted by the Department indicating that these three dust collectors have been eliminated and that N-14 has been renamed N-91.

In the above-captioned Draft Title V Permit, references made to these dust collectors are as follows:

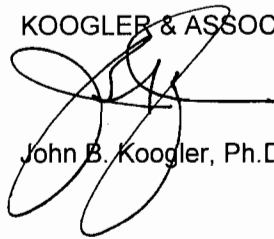
1. Page 10 of 36 - Dust Collector E-29 is identified as EP02, Recycle Dust Airlift in the Brief Description of the raw mill system;
2. Page 23 of 26 - Dust Collector M-07 is identified as EP01, Clinker to Finish Mill; Dust Collector N-14 is identified as EP05, Cement Handling in Finish Mill; and Dust Collector Q-27 is identified as EP08, Cement Storage Silos, in the Brief Description of Finish Grinding Operations. N-14 has been renamed N-91 but serves the same purpose and can remain EP05.
3. Table 1, Allowable Opacity Limitations, Dust Collectors E-29, M-07, N-14 and Q-27 are all referenced in this table;
4. Table 1-1, Summary of Air Pollutant Standards and Terms, Dust Collector E-29 is identified as EP 02 on the page listing the Standards and Terms for EU002, and Dust Collectors M-07, N-14 and Q-27 are identified as EP01, EP05 and EP08, respectively, on the page listing the Standards and Terms for EU005.
5. Table 2-1, Summary of Compliance Requirements, Dust Collector E-29 is listed as EP02 on the page listing the Requirements for EU002, and Dust Collectors M-07, N-14 and Q-27 are identified as EP01, EP05 and EP08, respectively, on the page listing the Requirements for EU005.

The appropriate corrections should be made to the Title V Permit.

If there are any questions regarding these matters, please do not hesitate to contact me 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK/jhm
Enclosure

cc:	C.H. Fancy,	FDEP Tallahassee
	A.A. Linero,	FDEP Tallahassee
	Scott Sheplak,	FDEP Tallahassee
	Chris Kirts,	FDEP Jacksonville
	Doug Beason,	FDEP OGC, Tallahassee
	Fred Cohrs,	FRI Jacksonville
	Cary Cohrs,	FRI Newberry
	George Townsend,	FRI Newberry
	Segundo Fernandez,	OHFC, Tallahassee



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
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Mr. John Reynolds
Florida Department of
Environmental Protection
Division of Air Resources Management
111 S. Magnolia Drive, Suite 23
Tallahassee, Florida 32301

187-99-08
April 2, 2001

VIA FAX: 850-922-6979
and VIA USPS

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APR 06 2001

BUREAU OF AIR REGULATION

**Subject: Florida Rock Industries, Inc.
Comments on Draft Amended Air Construction
Permit No. 0010087-003-AC/PSD-FL-228A
Draft Title V Permit No. 0010087-002-AV**

Dear Mr. Reynolds:

As a follow-up to my memorandum to you dated March 16, 2001 and our subsequent telephone conversations, I would like to provide our final comments to resolve the few remaining issues regarding the above captioned Draft Amended Air Construction Permit and provide my understanding of matters related to the Draft Title V Permit. The comments on the construction permit are all directly or indirectly related to the VOC CEMS and to VOC monitoring and reporting requirements.

1. Averaging Time for VOC Emission Limit

It is my understanding that there is full agreement that the VOC emission limit for the kiln/raw mill will be 0.12 pounds per ton of clinker or a maximum of 11.5 pounds per hour expressed as a 30-day rolling average. This is the numeric VOC emission limit contained in the original Air Construction Permit issued to Florida Rock (AC01-267311/PSD-FL-228) with an averaging time agreed to by Florida Rock and the Department during the negotiations which resulted in the installation of the VOC Continuous Emission Monitoring System (CEMS). It is also my understanding that the only unresolved issue is an expressed concern regarding the potential magnitude of short-term VOC emission rates. As we have discussed, concerns about short-term VOC emission excursions are unfounded when one understands the nature of the operation of the Florida Rock Cement Plant.

VOC emissions from the Florida Rock Cement Plant, as discussed in previous correspondence with the Department, arise from two independent sources; inefficiencies in the combustion process of the pyro-processing system and organic compounds in the materials fed to the preheater. Testing conducted by Florida Rock during the summer of 2000, conclusively demonstrated that VOC emissions resulting from inefficiencies in the pyro-processing system are a small fraction of the

maximum permitted VOC emission rate for the plant. Emission measurements conducted by Florida Rock immediately after the startup of the plant (June - July, 2000) and emission measurements and tests conducted by Florida Rock over the next few months (through September 2000) demonstrated that hydrocarbon products in off-site feed materials (mill scale in particular) contributed most significantly to VOC emissions.

As a result of these findings, Florida Rock has established supplies of feed materials that result in VOC emissions from the kiln/raw mill that are well within the permit limits. Florida Rock continues to monitor the hydrocarbon content of off-site feed materials, but to provide the Department with assurance that feed materials free of hydrocarbon products are continually used and that VOC emissions from the kiln/raw mill stack are continually in compliance with permit limits, Florida Rock has further agreed to install a VOC CEMS on the kiln/raw mill stack.

Understanding that the major source of VOC emissions from the kiln/raw mill is hydrocarbons in the feed materials and further understanding that the feed materials are uniformly blended in quantities that will provide feed to the raw mill for approximately two days (7,000 + tons) makes it quite clear that there will not be unexpected, short-term VOC emission rate excursions. A short-term VOC emission rate excursion as a result of hydrocarbons in the feed material is not possible because of the blending and the amount of material blended. The other testing conducted by Florida Rock has demonstrated that VOC emissions from the pyro-processing system are not significant.

Another factor to consider is that VOC emissions from the kiln/raw mill under normal operating conditions are in the range of 0.08 - 0.09 pounds per ton of clinker (7.5 - 8.5 pounds per hour). This emission rate is comfortably below the permitted VOC emission limit of 0.12 pounds per ton of clinker, or 11.5 pounds per hour but the marginal difference does not allow Florida Rock much leeway to compensate for VOC emissions above the permitted rate, either in terms of magnitude of excess emissions or the duration of excess emissions, and still meet the 30-day rolling average hourly VOC limit. As Florida Rock is committed to operating within permit limits, the company will take every measure necessary to assure that suitable feed materials are used so that excess VOC emissions will not occur even for short durations of time because once excess emissions occur there is little opportunity to lower the resulting 30-day average emission rate.

Coupling the aforementioned facts with the facts that there is no ambient air quality standard for VOCs, and the fact that the VOC emissions from the plant are not HAPs, should provide the Department with assurance that, even if a slight VOC excursion occurred for a short time, there would be neither an exceedence of an air quality standard, nor a potential health-related risk to the general public.

Based upon all of the aforementioned facts, it is our position that the 30-day rolling average hourly VOC emission limit that the Department and Florida Rock agreed upon, along with the operation of the VOC CEMS and the record of data this monitor will provide, is reasonable assurance to the Department and any other interested parties of continuing compliance by Florida Rock and reasonable assurance that there are no environmental or health related risks associated with VOC emissions from the plant.

Reporting or record keeping of VOC emissions other than on the aforementioned and agreed upon basis is unwarranted. Understanding the operation of the cement plant, the potential sources of VOC emissions and the ramifications of excess VOC emissions to Florida Rock makes the establishment of an arbitrary, short-term VOC emission limit unnecessary.

2. Requirement for Oxygen CEMS Associated with the VOC CEMS

As I have pointed out in previous correspondence and in discussions with you and Department staff, the requirement for an oxygen CEMS associated with the VOC CEMS at the Florida Rock plant is unnecessary as all VOC limits for the plant are mass based; i.e., pounds per ton of clinker, pounds per ton of preheater feed or pounds per hour. To demonstrate the fact that the oxygen monitor is not required, and as we have discussed, I have attached an example calculation showing that the mass VOC emission rate is independent of the oxygen concentration of the stack gas.

The attached calculations present a hypothetical measured stack gas flow rate, stack gas temperature, stack gas moisture content, stack gas oxygen concentration, and stack gas VOC concentration. Based on these hypothetical conditions, a VOC emission rate is calculated based on the wet stack gas flow rate at the measured stack gas oxygen and VOC concentrations (both measured on a wet basis). The calculated VOC emission rate on this basis is 9.3 pounds per hour.

The second set of calculations show the stack gas VOC concentration corrected to a 7% oxygen concentration and also show the stack gas flow rate corrected to the same 7% oxygen concentration. Based on the oxygen corrected VOC concentration and stack gas flow rate, a VOC emission rate, corrected 7% oxygen, is calculated. This emission rate is also shown to be 9.3 pounds per hour. This demonstrates that the mass VOC emission rate is independent of the oxygen concentration of the stack gas and thus demonstrates an oxygen CEMS is not required as a counterpart to the VOC CEMS.

3. Definition of "Operating Time" for Calculating 30-day Rolling Average Hourly VOC Emission Rate

In calculating the 30-day rolling average hourly VOC emission rate, Florida Rock has agreed to use only data collected when the cement plant is operating. This commitment by Florida Rock was in response to a stated concern that the pyro-processing system (the preheater, precalciner and kiln) might be operated with excess VOC emissions and that these excess emissions might be averaged with zero emissions recorded during plant down time to arrive at a 30-day rolling average hourly VOC emission rate well within permit limits.

For purposes of this commitment, FRI proposes that pyro-processing "operating time" be defined as all hours during a 30-day rolling averaging period when raw meal is fed to the preheater. This definition corresponds with the method that Florida Rock presently uses to define plant operating time and it accounts for all potential sources of VOC formation from the pyro-processing system feed and fuel.

4. Factor to Convert Preheater Feed to Clinker Production

At the Florida Rock Cement Plant, the measured parameter for determining the plant production rate on an hourly basis is the preheater feed rate. On a short-term (hourly) basis, clinker production is determined by dividing the preheater feed rate by an empirical factor. For permitting purposes, Florida Rock used an average factor of 1.56. In other words, the permitted feed rate to the Florida Rock preheater of 149.9 tons per hour divided by 1.56 results in the permitted clinker production rate of 95.8 tons per hour.

This empirical factor can typically range from 1.5 to 1.7 for various cement plants depending upon the chemistry of the feed material. Variations can also be expected at any given plant because of the natural variability in site feed materials, variability or changes in off-site feed materials and/or changes in the feed material mix ratios.

This empirical factor plays a role in compliance demonstration in that mass emission rates of regulated pollutants are measured during compliance tests in terms of pounds of emissions per hour. This reported emission rate is then divided by the clinker production rate (tons per hour) to arrive at an emission rate expressed as pounds per ton of clinker. These limits are also permit conditions. As the preheater feed rate is measured (tons per hour), the emission rates are measured (pounds per hour) and clinker production rates are calculated based upon the empirical factor (tons per hour), it is apparent that variations in the empirical factor could affect the emission rates reported as pounds per ton of clinker.

For all compliance testing conducted at Florida Rock prior to this date and all compliance testing that will be conducted in the foreseeable future, Florida Rock elects to use the average empirical factor of 1.56 to convert preheater feed to clinker production rate. The use of this single empirical factor will negate the need



to determine a site-specific factor on a periodic basis and to report this time-dependent empirical factor to the Department prior to any compliance test.

5. Comments on Draft Title V Permit

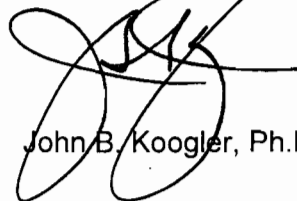
It is my understanding, based on conversations with Department staff that the comments expressed in my March 8, 2001 letter to Clair Fancy will be addressed as noted in my memo to you dated March 16, 2001 and that the confirmation, comments and/or assurance that the Northeast District Office is expecting from DARM has been provided or will be forthcoming.

~*~*~

To the best of my understanding, the comments and information provided herein should resolve any outstanding matters related to both the above captioned Amended Air Construction Permit and Draft Title V Permit. If further discussion or information is necessary, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK/jhm
Enclosure

cc: C.H. Fancy, FDEP Tallahassee
A.A. Linero, FDEP Tallahassee
Scott Sheplak, FDEP Tallahassee
Chris Kirts, FDEP Jacksonville
Doug Beason, FDEP OGC, Tallahassee
Fred Cohrs, FRI Jacksonville
Cary Cohrs, FRI Newberry
Segundo Fernandez, OHFC, Tallahassee

**CALCULATION DEMONSTRATING INDEPENDENCE
OF MASS (VOC) EMISSION RATES TO THE
OXYGEN CONCENTRATION OF STACK GAS**

Basis of Calculations:

Measured:	Stack Gas Flow	–	80,000 acfm at 11/0% O ₂
	(Flow) _s	–	135,771 scfm, wet 11.0% O
		–	115,406 scfm, dry
	Stack Gas Temp.	–	240° F
	Stack Gas Moist.	–	15%
	Stack Gas Oxygen	–	11.0%, wet gas
	VOC Conc. (C _(voc-s))	–	10.0 ppm, wet gas

VOC Emission Rate (Stack Conditions):

$$\begin{aligned}
 E_{(voc-s)} &= (135,771 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \\
 &\quad \times (10.0 \times 10^{-6} \text{ ft}^3 \text{ VOC}/\text{ft}^3 \text{ stack gas}) \\
 &\quad \times (1/385 \text{ ft}^3/\text{lb-mole}) \times (44 \text{ lb VOC}^*/\text{lb-mole}) \\
 &= 9.3 \text{ lb/hr}^*
 \end{aligned}$$

* as propane

Oxygen Correction:

VOC Concentration at 7% Oxygen

$$\begin{aligned}
 C_{(voc-7)} &= C_{(voc-s)} (20.9 - 7) / (20.9 - \text{Stack Gas O}_2) \\
 &= 10.0 (13.9) / (20.9 - 11.0) \\
 &= 14.0 \text{ ppm}
 \end{aligned}$$

Stack Gas Flow (scfm, wet) at 7% Oxygen

$$\begin{aligned}
 (\text{Flow})_7 &= (\text{Flow})_s (20.9 - \text{Stack Gas O}_2) / (20.9 - 7) \\
 &= 135,771 (20.9 - 11.0) / (13.9) \\
 &= 96,700 \text{ scfm, wet at 7.0 \% O}
 \end{aligned}$$

VOC Emission Rate (at 7% Oxygen)

$$\begin{aligned}
 E_{(voc-7)} &= (96,700 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \\
 &\quad \times (14.0 \times 10^{-6} \text{ ft}^3 \text{ VOC}/\text{ft}^3 \text{ Stack Gas @ 7\% O}_2) \\
 &\quad \times (1/385 \text{ ft}^3/\text{lb - mole}) \times (44 \text{ lb VOC}^*/\text{lb-mole}) \\
 &= 9.3 \text{ lb/hr}^*
 \end{aligned}$$

* as propane



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
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KA 187-99-08

MEMORANDUM

RECEIVED

MAR 20 2001

BUREAU OF AIR REGULATION

To: John Reynolds
FDEP Tallahassee

From: John Koogler

Date: March 16, 2001

Subject: Comments on FRI permits
0010087-003-AC/PSD-FL-228A and
0010087-002-AV

This is to provide you with our understanding of the resolutions of the matters that were discussed during our March 14, 2001 meeting in Tallahassee related to the above captioned permits. The numeric designation of each matter is from my letter to Clair Fancy dated March 8, 2001; the letter that provided the framework for our March 14, 2001 discussion. Comments are separated into those related to the Construction Permit and those related to the Title V permit.

CONSTRUCTION PERMIT COMMENTS

- 1.1 The terminology "Multi-Stage Calciner" will be changed to "Multi-Stage Combustion Calciner.
- 2.1 Suggested change will be adopted. The rule citations will be checked and corrected if necessary.
- 2.2 Requirement for oxygen monitor will be deleted from permit. A statement regarding the frequency of reporting (i.e, quarterly; semi-annual, etc.) may be added.
- 2.3 The 45-day reporting requirement will be adopted.
- 3.1 The averaging time for VOC emission limit will be a 30-day rolling average hourly rate and the VOC monitoring will be providing reasonable assurance.
- 3.2 The language clarifying the description of the whole tire feed system is acceptable. DARM will confirm the acceptability of this language for Title V purposes to the NE District office of FDEP.

- 3.3 The requirement for additional beryllium testing and the necessity of a beryllium emission limit in the AC and AV will be addressed at another time.
- 4.1 The pre-heater feed rate issue will be addressed at another time.
- 4.2 There is an error in "Revised Table II" of the amended air construction permit. In Footnote** the correct date should be March 31, 2002. This will be corrected both in the AC and AV.

Further, it is understood that the Compliance Plan of the Title V Permit will allow the installation and certifications of any necessary CEMS, the installation and debugging of the Multi-Stage Combustion system (both by December 30, 2001) and the review of monitoring data collected after the MSC system is operational (by March 31, 2002).

TITLE V PERMIT COMMENTS

- 1.1 See comment 1.1 under AC comments
- 1.2 OK
- 1.3 OK
- 1.4 Comment will be reviewed by the NE District.
- 1.5 OK/OK
- 1.6 Scott Sheplak will review and provide comments to the NE District.
- 1.7 OK
- 1.8 OK
- 1.9; 1.11 and 1.16:

To be consistent with the AC, the Title V Permit will use the terminology "pounds per ton of dry feed". The understanding is that this is dry feed to the pre-heater of the pyro processing system; the only place feed is measured.
- 1.10 OK
- 1.12 OK, NE District may seek clarification from DARM.
- 1.13 OK; Scott Sheplak may have to provide assurance as the Title V permit language follows the AC permit language.

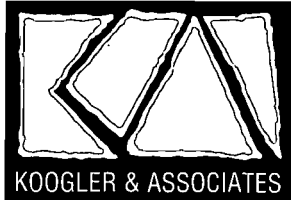
Mr. John Reynolds
FDEP Tallahassee

March 16, 2001

- 1.14 OK/Reference to P.S. 8 or 8A will be checked to determine which is correct.
- 1.15 OK
- 1.17 OK
- 1.18 Footnote will be corrected to be consistent with Footnote ** of Table II, Revised of the amended AC permit; as this table will be corrected (see comment 4.2).
- 1.19 OK
- 2.4 OK
- 2.5 See comment 1.6
- 2.6 OK

If your understanding of the resolution of any of the matters differs from my understanding, please give me a call. We appreciate the time everybody has spent reviewing and discussing these matters.

cc: C.H. Fancy, FDEP Tallahassee
A. A. Linero, FDEP Tallahassee
Scott Sheplak, FDEP Tallahassee
Chris Kirts, FDEP Jacksonville
Fred Cohrs, FRI Jacksonville
Cary Cohrs, FRI Newberry
Segundo Fernandez, OHFC, Tallahassee



KOOGLER & ASSOCIATES
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352/377-5822 ▪ FAX/377-7158

KA187-99-08

March 8, 2001

RECEIVED

MAR 09 2001

BUREAU OF AIR REGULATION

Mr. C.H. Fancy
Florida Department of Environmental Protection
Division of Air Resources Management
111 S. Magnolia Drive, Suite 23
Tallahassee, Florida 32301

Subject: Florida Rock Industries, Inc.
Comments on Draft Amended Air Construction
Permit 0010087-003-AC/PSD-FL-228A
and Draft Title V Permit 0010087-002-AV

Dear Mr. Fancy:

We've had the opportunity to review the above captioned draft Air Construction Permit and draft Title V Permit both dated January 26, 2001, and would like to provide comments for your consideration. Many of the comments are editorial. Others are to provide consistency with the Consent Order presently being negotiated by Florida Rock and the Department, to provide consistency with the original Air Construction Permit Application or draft Amended Air Construction Permit, to account for rule requirement or new information, or for clarification.

1.0 EDITORIAL COMMENTS

1.1 In several places, both in the Draft Amended Air Construction Permit and the Draft Title V permit, the kiln system is referred to as a "Multi Stage Calciner." The correct terminology should be Multi-Stage Combustion Calciner. This terminology appears on the first page of the Joint Public Notice, on page 1 of 4 of the Technical Evaluation and Preliminary Determination of the draft Amended Air Construction Permit, on page 1 of the draft Amended Air Construction Permit, on page 2 of the Statement of Basis of the Draft Title V Permit, and perhaps other locations in both draft permits.

1.2 Draft Title V Permit, Statement of Basis, page 1, third paragraph.

"hazardous air pollutant" should read, "hazardous air pollutants."

1.3 Draft Title V Permit, Statement of Basis, page 2.

If the list of emission units is meant to be complete, Emission Unit 007-Coal Handling and Grinding, should be added.

Also on this page, the list of conditions clarifying the scope of activities that may continue following the issuance of the Title V Permit does not include a condition number 2.

1.4. Table of Contents and throughout Draft Title V Permit.

It is suggested that Common Conditions H through K be included either as Facility-Wide conditions or as Specific Conditions applicable to specific emission units. This would eliminate the ambiguity that exists as a result of the present formatting.

1.5. Draft Title V Permit, page 2, fourth paragraph.

This paragraph should also reflect the fact that the facility is subject to 40 CFR 60, Subpart OOO, New Source Performance Standards for Non-Metallic Mineral Processing Plants.

Also, if the list of Emission Units is meant to be complete, Emission Unit 007-Coal Handling and Grinding, should be added. This same comment applies to Specific Condition 7 (page 5) of the Draft Title V Permit.

1.6 Draft Title V Permit, page 5, Compliance Plan.

As the Air Construction Permit has established opacity limits for the emission points subject to Subpart OOO, the Compliance Plan Condition 5 should be deleted. (Also see Comment 2.5.)

1.7. Draft Title V Permit, page 6, second set of bullet items.

The second bullet item should read, "The plant area..." In the 6th bullet item, third line, there appears to be text missing following the word, "excess."

1.8. Draft Title V Permit, page 9, Condition A.4.

The parenthetical expression should reference conditions A.2. and A.3.

1.9. Draft Title V Permit, page 14, Conditions C7,C8 and C9.

The PM, PM10, and SO₂ emission limits from the kiln/raw mill should be limited to pounds per ton of dry feed to the preheater (not kiln).

1.10. Draft Title V Permit, page 15, Conditions C.10.

It is suggested that this condition be worded:

NOx emissions shall not exceed 3.8 pounds per ton of clinker (30-day rolling average) after startup and until December 20, 2001. After December 30, 2001, NOx emissions shall not exceed 2.8 pounds per ton of clinker (30-day rolling average). The permittee shall install any additional control equipment by December 30, 2001 to ensure compliance with the 2.8 pounds per ton of clinker limit. The startup date was December 31, 1999.

This proposed wording incorporates the specific dates included in the Amended Air Construction Permit.

1.11 Draft Title V Permit, page 15, Conditions C11, C12 and C14.

In all three conditions, it should be specified that the emission limits are related to tons of dry feed to the preheater.

1.12. Draft Title V Permit, page 16, box comments.

The term "Cooler" should be deleted from all entries in the Description column. This condition applies only to EU 003, which is the kiln/raw mill; not the clinker cooler.

Under this same comment, Footnote No. 7 should be changed to specify the VOC CEMS as this is what has been agreed upon.

1.13. Draft Title V Permit, page 18, Condition C.30.

Performance Specification 1 applies only to opacity monitors and should be deleted from this condition.

1.14. Draft Title V Permit, page 18, Condition C.33.

The VOC monitor is a continuous emission monitor (not an opacity monitor).

The Performance Specification referenced should be 8 (not 8A). Performance Specification 8A does not appear to exist.

1.15. Draft Title V Permit, Page 18, Condition C.37.

The title of this condition should read Coal, Tires, Fuel Oil, and Raw Materials as this condition specifies record keeping requirements for all four material categories.

1.16. Draft Title V Permit, Page 20, Condition D.3.

The PM emission limit from the clinker cooler should be based on dry feed to the preheater, (not kiln).

1.17 Table II.

The unrevised Table II should be deleted from the Title V Permit.

1.18. Table II (revised).

The footnote** should read:

After startup and until December 30, 2001, the kiln shall not exceed an NOx limit of 3.8 lbs. per ton of clinker, and 2.8 pounds per ton of clinker thereafter. The Department may revise the emission limit to less than 2.8 pounds per ton of clinker (30-day rolling average) based on compliance tests and continuous emission monitoring data to be submitted by March 31, 2002.

These suggested changes will make Table II (revised) consistent with the Air Construction Permit and the revised Air Construction Permit. Changing the date for submitting NOx monitoring data to 2002 is only reasonable as changes to the MSC Calciner will not be complete until December 30, 2001.

1.19. Table I-I.

In the Standards column of all pages of this table, the standards should be stated as less than or equal to (rather than less than) the stated standard.

2.0 COMMENTS RELATED TO A CONSISTENCY WITH DEPARTMENT RULE OR WITH AIR CONSTRUCTION PERMIT REQUIREMENTS

2.1 Draft Amended AC Permit, page 2, Specific Condition No. 6 (modified).

The added language states, in part:

If the kiln is tested while firing less than 30% tires, subsequent operation is limited to the percentage of tires burned during the test...

To be consistent with the rule 62-297.310(2)(b), F.A.C., the cited rule requirement, the condition should read:

...subsequent operation is limited to 110% of the percentage of tires burned during the test, not to exceed 30% of the total heat input.

Operation at 10% above the tested rate is consistent with Rule 62-297.310 (2)(b), FAC.

This condition also appears in the Draft Title V Permit, page 17, first paragraph, and should be corrected there also.

2.2 Draft Amended AC Permit, page 2, Specific Condition 6.A (new).

The continuous oxygen monitor is not a necessary component of the VOC CEMS. There is no rule requirement for an oxygen monitor nor are there any permit conditions requiring the VOC concentration in the stack gas to be corrected to a reference oxygen concentration. The MACT standard for Portland cement plants limits the VOC concentration in the kiln/raw mill stack to 50 ppm as propane, corrected to 7% oxygen. Such a standard would require an oxygen monitor. The FRI Air Construction Permit, however, limits VOC emissions only to mass emission rates (pounds per hour, tons per year and pounds per ton of preheater feed). Oxygen corrections are not needed

for these mass emission limits. Hence, the requirement for an oxygen monitor as a component of the VOC CEMS need to be deleted.

This same requirement appears in the Draft Title V Permit, page 18, Condition C.33. The requirement for an oxygen monitor needs to be deleted from this condition also.

2.3 Draft Amended AC Permit, page 2, Specific Condition 6b (new).

This proposed condition, if retained (see comment 3.3 regarding the need for additional beryllium tests), needs to be changed to require that test reports be provided to the Department within 45 days after completion of the last test run. This requirement is consistent with Rule 62-297.570, FAC. Furthermore, it has been our experience that often it is not possible to get analytical results for metals from a laboratory in sufficient time to meet the suggested 30 day reporting requirement.

This same requirement appears in the Draft Title V Permit, page 18, Condition C.34 and needs to be corrected there also or, the condition deleted if further beryllium testing is not required.

2.4 Draft Title V Permit, Statement of Basis, page 1, paragraph 4.

It should be clarified that the control by application of water sprays is as needed. Neither the Air Construction Permit, nor the draft Amended Air Construction Permit require continuous water spray. New permit conditions cannot be imposed by Operating Permit.

The same condition appears in the Draft Title V Permit, page 8, first paragraph, and needs to be corrected there also.

2.5 Draft Title V Permit, Statement of Basis, page 3, Condition No. 5.

Condition 5 requires Florida Rock to report to the Department the equipment, subject to 40 CFR 60, Subpart OOO, that is subject to wet processing visible emission limits (zero opacity) and what equipment is subject to dry processing limits (10% opacity). The Air Construction Permit has already made this determination. The opacity limits established in the Air Construction Permit are further reflected in the Draft Title V Permit, page 8 of 36, specific conditions A.2. and A.3. Specific Condition A.2. sets opacity

limits of 10% for raw material processing and raw material handling and storage (EP 01 and 02). Specific Condition A.3. establishes an opacity limit of 15% for the primary crusher (EP 03). This condition therefore needs to be deleted from the Title V Permit.

This same condition appears in the Draft Title V Permit, page 9, Condition 8.6, and needs to be deleted there also.

2.6. Draft Title V Permit, page 18, Condition C.35

The permitted opacity limit for the kiln/raw mill (Condition C.6.) is 10%. The reporting of excess visible emissions should include both the times when the 10% opacity limit is exceeded as well as times when the 20% opacity limit is exceeded. The 20% opacity limit is specified by 40 CFR 60.62(a)(2.)

3.0 COMMENTS TO PROVIDE CONSISTENCY WITH CONSENT ORDER AND WITH NEW INFORMATION.

3.1 VOC Averaging Time.

To provide the Department with reasonable assurance that compliance with the VOC emission limit will be achieved on a continuing basis and as a condition of the Consent Order negotiated by Florida Rock and the Department, Florida Rock will install a VOC CEMS in the kiln/raw mill stack. As agreed, the CEMS will be installed in accordance with the EPA Performance Specification 8 (40 CFR 60, Appendix B) and will be operated continuously. Also as agreed, by the Department and FRI, the kiln/raw mill stack gas VOC concentration measured and recorded by the VOC CEMS is to be reported as an hourly concentration averaged over a rolling 30-day period. Neither the 30-day rolling average VOC concentration nor the time factor used in calculating the 30-day rolling average will include data from periods when the kiln system is not operating. The 30-day rolling average VOC emission data will be reported as pounds per hour and pounds per ton of clinker.

In considering the averaging time for VOC emissions, FRI considered both a rolling 30-day average and a block 30-day average. The block 30-day

averaging time is specified in the MACT Standard for Portland Cement Plants and is the averaging time specified in the air construction permit issued to Suwannee American Cement (Permit 1210465-001-AC/PSD-FL-259). The Suwannee American Cement Permit specifies the block averaging time as that plant is subject to New Source MACT Standards; Florida Rock is not. Florida Rock and Department personnel familiar with the Suwannee American permit are both of the opinion that the rolling 30-day average as suggested herein is the most appropriate averaging time.

The VOC CEMS is referenced at several places in both the draft Amended Air Construction Permit and the draft Title V Permit. Wherever applicable, the 30-day rolling averaging period for VOC emissions needs to be specified.

3.2 Draft Title V Permit, page 14, Box, Whole Tire Conditions.

The second bullet item specifies that tires used as fuel shall be fed into the kiln system at the transition section between the base of precalciner and the point gases exit the kiln. This condition further describes the tire feed mechanism as anticipated at the time the original air construction permit was issued. The final design of the tire feed mechanism is now complete, and incorporates the critical concepts of the originally anticipated design; i.e., the double airlock system.

The design of the tire feed mechanism is best described as:

Whole tires will be received from state approved tire collection facilities or state approved tire collecting companies, and unloaded onto a conveyer which transports the tires to an elevator, and then to a combination conveyer/scale for correct proportioning of tires and fossil fuel. The tires will then be fed into the preheater/kiln through a patented rotary feeder, which seals the tire entry point at the preheater kiln from the atmosphere. The feeder is powered by a variable speed hydraulic drive for the desired proportioning of tires to fossil fuel. The feeder is protected against exposure to excessive heat radiating from the preheater by an air operating, fast acting slide gate.

3.3 Beryllium Test Requirements.

The original Florida Rock Permit (AC 01-267311/PSD-FL-228) required initial emission measurements for beryllium and further specified that a beryllium emission limit (representing BACT) would be determined from the results of these emission measurements. As required by permit condition, Florida Rock conducted beryllium emission measurements on the kiln/raw mill stack on July 24, 2000, and reported a beryllium emission rate of 0.06 pounds per hour. This reported emission rate appeared anomalous, and as a result, Specific Condition 6.b.(new) in the draft Amended Air Construction Permit requires Florida Rock to conduct quarterly beryllium emission measurements on the kiln/raw mill stack during calendar year 2001 by March 31, June 30, September 30, and December 31.

In compliance with this anticipated condition, Florida Rock conducted the first quarterly beryllium emission measurements on the kiln/raw mill stack on February 6-7, 2001. The results of these emission measurements demonstrated a beryllium emission rate of 0.000046 pounds per hour. This emission rate is nominally 1000 times lower than the emission rate reported for the July 24, 2000 emission measurements.

Suspecting a possible laboratory error, the laboratory that conducted the beryllium analyses on both sets of samples (Flowers Chemical Laboratories, Inc., Altamonte Springs, Florida) was contacted and asked to review both sets of data. Flowers responded that they had mistakenly reported the July 24, 2000 sample beryllium weights as milligrams of beryllium rather than the correct weight in micrograms. This accounts for the anomalous beryllium emission rate reported for the July 2000 test. The correct beryllium emission rate for the July 24, 2000 test should have been 0.000062 pounds per hour. This compares with the emission rate measured in February 2001 of 0.000046 pounds per hour.

Even at the emission rate of 0.000062 pounds per hour, the beryllium emissions from the FRI plant would be in the range of 0.5 pounds per year assuming the plant operated 100% of the time. This is less than the emission rate of 0.8 pounds per year which had been the PSD significant emission rate threshold for beryllium prior to this metal being delisted. (See Draft Amended Air Construction Permit, Technical Evaluation and Preliminary Determination, page 3).

As a result of the fact that beryllium has been delisted as a PSD pollutant, Florida Rock requests that the requirement for a beryllium emission limit be deleted from all permits. As a basis for this request, we cite an EPA Guidance Memo dated March 11, 1991 addressing the 1990 amendments to the Clean Air Act as they relate to beryllium and other PSD pollutants that were delisted. In part, the guidance memo states that:

“...States with an approved PSD Program may continue to regulate the ... air pollutants now exempted from Federal PSD... if the State PSD regulations provide an independent basis to do so...”

The Florida Air Rules do not regulate beryllium. As a result FRI requests that the Department remove the beryllium emission limit from all permits. This request is consistent with the referenced EPA Guidance ~~Manual~~ ^{Memo} which states:

“...For Federal PSD permits containing PSD requirements for the pollutants exempted [such as beryllium]...issued on or after November 15, 1990, the permittee may request a revision (e.g., removal of a BACT limit) to their PSD permit to reflect the... exemption from Federal PSD applicabilities.” (Emphasis added.)

Consistent with this Federal guidance, and the fact that Florida presently has no regulations pertaining to beryllium, Florida Rock makes this request.

4.0 Comments Related to Clarification

4.1 Clarification of Preheater Feed Rate

Florida Rock requests that the hourly preheater feed rate and the hourly and daily clinker production rates specified in both the draft Amended Air Construction Permit and the draft Title V Permit be specified as 30-day average rates. That is, the hourly preheater feed rate would be specified as 149.9 tons per hour, 30-day rolling average, the hourly clinker production rate would be specified as 95.8 tons per hour, 30-day rolling average, and the daily clinker production rate would be specified as 2,300 tons per day, 30-day rolling average. In calculating these 30-day rolling averages, times when the kiln system is not operating will be excluded; in other words, the 30-day rolling average periods will include only periods of time when the kiln system was operating.

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With the annual clinker production limited to 712,500 tons per year, a condition which will not change, the annual emission caps cannot be exceeded. Additionally, Florida Rock will continue to comply with the maximum permitted emission limits for NO_x, SO₂, and VOCs, and demonstrate compliance with the CEMS for these pollutants. Thus, the Department will have assurance that even with the production limits being determined on a 30-day rolling average basis, the maximum permitted emission rates for NO_x, SO₂, and VOCs will not exceed the maximum permitted rates specified by permit.

4.2 Clarification of Compliance Plan

The draft Amended Air Construction Permit will extend the expiration date of construction permits until March 31, 2001, and authorizes the replacement and/or addition of continuous monitoring equipment and the conversion of the kiln system to a low NO_x multi-stage combustion calciner. The replacement and/or addition of continuous monitoring equipment and the conversion of the kiln system to the low NO_x multi-stage combustion calciner is to be completed by December 30, 2001. Work on these projects occurring after March 31, 2001 (the expiration of the Amended Air Construction Permit) is authorized by the Compliance Plan in the Title V Permit.

Certain statements made in the draft Amended Air Construction Permit and the draft Title V Permit related to the extension of the Air Construction Permit and the Compliance Plan in the Title V Permit require clarifications. For example, in the Technical Evaluation and Preliminary Determination of the draft Amended Air Construction Permit (page 2, 4th paragraph) it is stated:

Compliance with the NO_x limit by December 31, 2001 will be confirmed by the continuous emission monitoring system (CEMS). The [Amended Air Construction] Permit will be extended until March 31, 2001 to allow conversion of the precalciner, conduction additional fine-tuning, and provide the Department an FRI with time to review the results. This review may allow the Department to exercise the condition in Table II of the Permit to, "revise the [NO_x] limit to less than 2.8 lbs/ton clinker (30-day rolling average) based on compliance test and continuous emission monitoring data."

It is quite apparent that if compliance with the NO_x emission limit of 2.8 pounds per ton of clinker is not required until December 31, 2001, the review

of monitoring data and the Department's review of the permit limit can certainly not be completed by March 31, 2001. The earliest possible date for collecting and reviewing NOx emission data once the 2.8 lbs/ton of clinker NOx limit becomes effective would be March 31, 2002. This same date discrepancy appears in revised Table II of the draft Amended Air Construction Permit.

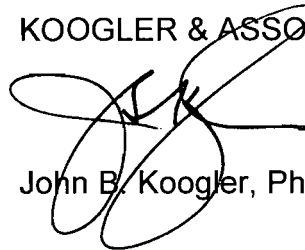
Both draft permits should be reviewed and references to the extended expiration date of the Air Construction Permit (March 31, 2001), the date for NOx Compliance Demonstration (December 30, 2001) and the date for reviewing NOx CEM data following the December 30, 2001 compliance date (March 31, 2002) need to be clarified. These dates should specifically be clarified in the Compliance Plan of the draft Title V Permit.

* * * * *

We appreciate your consideration of these comments. If there are questions, or if further information is required regarding these comments, please do not hesitate to contact me at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES



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

JBK:jhm

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Scott Sheplak, FDEP Tallahassee
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MAR 2 2001

March 1, 2001

BUREAU OF AIR REGULATION

VIA HAND DELIVERY

Douglas W. Beason, Assistant General Counsel
Office of General Counsel
Florida Department of Environmental Protection
Florida Department of Environmental Protection
3900 Commonwealth Blvd.
Tallahassee, FL 32399-3000

Re: Second Request for Extension of Time to File Petition for Administrative Hearing
Draft Modified Air Construction Permit Modification: FDEP File No.: 0010087-003-
AC/PSD-FL-228-A
Draft Title V Permit No.: 0010087-002-AV
Thompson S. Baker Cement Plant, Newberry, Alachua County, Florida

Dear Doug:

Thank you for returning my call today. As you know, we represent Florida Rock Industries, Inc. with respect to the Air Construction Permit and Title V Permit for the above-referenced facility. The company received the Department's Intent to Issue the draft Air Construction Permit Modification and the draft Title V Permit on January 30, 2001. On February 8, 2001, we requested an extension of time to file a petition for administrative hearing on both draft permits, the air construction permit and the Title V permits, until March 1, 2001. Since that time, Florida Rock has exchanged information with the Department concerning the draft Modified Air Construction Permit and draft Title V Permit, and appreciates the cooperative nature of such discussions.

On behalf of Florida Rock Industries, Inc., and pursuant to Rule 28-106.111, Florida Administrative Code, we hereby file this request for an extension of time to file a petition for administrative hearing with respect to the draft Air Construction Permit Modification and with respect to the draft Title V Permit, both referenced above, for an additional 29 days, up to and including Monday, April 2, 2001. The applicant needs additional time to review the draft permits, which are quite lengthy and detailed.

Douglas W. Beason, Assistant General Counsel
March 1, 2001
Page 2

I understand that you will be in contact with Chris Kirts and Al Linero concerning this second extension request, and that you will call me following your discussions with them.

Thank you for your consideration. If you have any questions, please call me or Segundo J. Fernandez.

Sincerely,

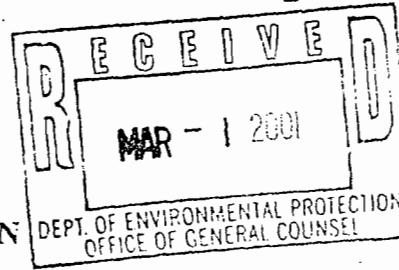


Timothy P. Atkinson

c: Kirby B. Green, III
Howard Rhodes
C. H. Fancy, P.E.
Al Linero, P.E.
Chris Kirts
Fred W. Cohrs
John Koogler, Ph.D., P.E.

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850-4360



**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

ALACHUA COUNTY,

Petitioner,

v.

Case No.:

FDEP File Nos. 0010087-003-AC/PSD-FL-228-A
and 0010087-002-AV

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

and

FLORIDA ROCK INDUSTRIES, INC.,

Respondents.

ALACHUA COUNTY'S PETITION FOR FORMAL ADMINISTRATIVE HEARING

Petitioner, Alachua County ("County"), hereby files a petition for formal administrative hearing, pursuant to Sections 120.569 and 403.0872(5), Florida Statutes, and Rules 28-106.111 and 28-106.201, Florida Administrative Code (F.A.C.), to challenge the State of Florida Department of Environmental Protection's ("DEP" or "Department") Notice of Intent to Issue Draft Title V Construction Permit Modification No. 0010087-003-AC and Draft Title V Operation Permit No. 0010087-002-AV for the Thompson S. Baker Cement Plant in Newberry located on County Road 235, 2.5 miles Northeast of Newberry in Alachua County, and states the following:

1. The affected agencies and file numbers in this matter are:

- a. State of Florida Department of Environmental Protection
Office of General Counsel
c/o Kathy Carter, Agency Clerk
3900 Commonwealth Boulevard, MS 35
Tallahassee, Florida 32399-3000

FDEP File Nos. 0010087-003-AC/PSD-FL-228-A, AC01-267311/PSD-FL-228, and 0010087-002-AV.

- b. United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
61 Forsyth Street
Atlanta, Georgia 30303

FDEP File Nos. 0010087-003-AC/PSD-FL-228-A, AC01-267311/PSD-FL-228, and 0010087-002-AV.

2. The Petitioner is:

Alachua County
c/o David C. Schwartz, Assistant County Attorney
Office of the County Attorney
12 S.E. 1st Street
Gainesville, Florida 32602-2877
(352) 374-5218

3. Petitioner, Alachua County, is a charter county that is vested with the authority and duty to protect the public health, safety, and welfare of the citizens of Alachua County, in which the subject cement plant is located. The proposed issuance of Draft Title V Construction Permit Modification No. 0010087-003-AC and Draft Title V Operation Permit No. 0010087-002-AV for the cement plant poses a real, immediate, and ongoing threat of discharging such types and quantities of pollutants so as to jeopardize or compromise the health, safety, and welfare of the County's citizens, particularly given the applicants' outstanding and unresolved violations and failure to otherwise demonstrate reasonable assurances that it will comply with all applicable rules, regulations, and permit conditions, as described more fully below. Petitioner is also the owner of property and operates and employs personnel at the Half Moon Fire & Emergency Medical Transport Station at 6005 S.W. State Road 45, approximately 8.2 miles south of the cement plant, and the

Jonesville Fire Station (Station #17) at 401 N.W. 143rd Street, approximately 9.7 miles east of the cement plant. The Jonesville Fire Station is part of the First Alarm assignment to the cement plant for any emergency. The County has also experienced increasing ozone levels and has a substantial interest in protecting its citizens, agriculture, and economy from the deleterious health effects of ozone and other pollutants emitted from the cement plant, and from the potentially adverse consequences of the County becoming non-attainment for ozone, for which volatile organic compounds (VOCs) and nitrogen oxides (NO_x) are precursors. Further, emissions from the cement plant are reasonably expected to degrade the water quality of the nearby Santa Fe River and exacerbate mercury and nitrate levels that are already high and that pose threats to public health and to the recreational utility of this Outstanding Florida Water. As demonstrated, the County clearly is a substantially affected party with standing to challenge the proposed permits.

4. The County received a copy of the Intent to Issue the draft permits on January 30, 2001. On February 9, 2001, the County timely filed a Request for Extension of Time to File Petition for Formal Administrative Hearing, seeking an extension of time until March 1, 2001. The Department has not yet acted upon the Request, and by operation of Rule 28-106.111(3), F.A.C., the County still has until at least March 1, 2001, or even until the Request is acted upon, to file a petition. Thus, the filing of this Petition is timely.

5. Disputed Issues of Material Fact:

a. Whether the applicant has violated the volatile organic compounds (VOC) emission limit of 11.55 lbs. per hour and 0.12 lbs. per ton of clinker, established in Table II of the Construction Permit and Section III, Conditions C.12., H.0., and I.1. of the proposed Operation Permit. This issue is one of mixed fact and law, and an issue of material fact remains in dispute, at least so long as the applicant refuses to formally stipulate to an admission of the violations.

b. Whether the applicant has demonstrated that it can effectively control the quality of its raw materials and fuels so as to assure that it will comply with all applicable emission limits, including but not limited to VOCs and NO_x.

c. Whether contributing causes exist for applicant's VOC violations other than the purported contamination of mill scale and fly ash used as raw feed.

d. Whether the requirement for a continuous emission monitor for VOCs, in Specific Condition 6.a. of the proposed modification to the Construction Permit and in Section II, Condition 7.3, and Section III, Condition C.33 of the Operation Permit, is adequate to ensure that the applicant will comply with its VOC emission limit.

e. Whether existing testing and operating data demonstrate that the applicant will meet the required NO_x emissions reduction to 2.8 lb. NO_x/ton of clinker in Table II of the Construction Permit and in Section II, Condition 7.2, and Section III, Conditions C.10., H.0., and I.1. of the proposed Operation Permit without, or with, application of a Low NO_x Multi-Stage Calciner (MSC).

f. Whether the applicant has demonstrated that it will burn tires as a fuel properly and in the manner intended through the permit applications and Specific Condition 4 and 6 of the Construction Permit and Section III, Condition C.3., of the proposed Operation Permit, and so as to assure compliance with its emission limits and permit conditions.

g. Whether the applicant's cement plant, as presently constructed, is capable of consistently emitting substantially lower levels of mercury and total particulate matter (PM) than the proposed emission limits in the subject permits, and whether such limits should be revised downward based upon test results and monitoring data in order to optimize pollution control in the manner described for SO₂, NO_x, VOCs, and CO in Section III, Condition I.1, of the proposed Operation Permit.

h. Whether the applicant's cement plant is reasonably expected to significantly degrade the surface waters of the Santa Fe River, designated Outstanding Florida Waters located approximately 8 miles from the cement plant, and the underlying Floridan Aquifer by way of atmospheric deposition of mercury and nitrogen (as nitrates).

i. Whether the applicant has demonstrated that its cement plant will consistently and simultaneously meet its emission limits for VOCs and NO_x.

j. Whether the applicant has demonstrated reasonable assurances that it will comply with the emission limits for VOCs, NO_x, and with all other applicable rules, regulations, and permit conditions, given (1) the unresolved permit and rule violations for (a) failure to timely notify the Department and the Environmental Protection Agency (EPA) Administrator of commencement of construction; (b) failure to timely notify the Department and the EPA Administrator of the initial plant startup; (c) failure to timely demonstrate compliance with SO₂ limits by way of continuous emission monitoring; (d) VOC exceedances during at least the months of July through September, 2000; (e) failure to immediately notify the Department of the VOC exceedances; and (f) failure to use required and appropriate test methods for VOCs and other pollutants; and (2) existing operating and testing data that demonstrate problems with VOCs and NO_x; (3) the apparent lack of control over the quality of raw materials and fuel supply; (4) lack of any demonstration that tires will be burned as a fuel properly and in a manner that complies with all rules and permit conditions, including emission limits; (5) the applicant's apparent opposition or resistance to the proposed installation of a Low NO_x Multi-Stage Calciner (MSC) and VOC continuous emission monitor; and (6) other possible factors to be determined through discovery. This is an issue of mixed fact and law, but certainly involves issues of material fact in dispute.

k. Whether reasonable assurances of compliance have been demonstrated for tire burning and beryllium at the time of the issuance of the proposed permits, rather deferring this determination to a future date (see Table II of the proposed modification to the Construction Permit and Section III, Condition C.13 and Table 2-1, EU003 Kiln, of the proposed Operation Permit). This is an issue of mixed fact and law, but certainly involves issues of material fact in dispute.

l. Whether the proposed permit limits for mercury of 200 lbs. per year and for total particulate matter (PM) of 0.20 lbs. per ton of dry feed to the kiln, 0.31 lbs. per ton of clinker, 30.00 lbs. per hour, and 110.50 tons per year, in Table II of the Construction Permit and in Section II, Condition 7.1, and Section III, and Conditions C.7, H.0., and I.1., of the Operation Permit, are overly inflated and unrepresentative of projected emission levels, fail to optimize pollution control, and fail to adequately protect public health, safety, and welfare.

m. To the extent that Appendix TV-3, Title V Conditions, was distributed to the applicant only, as stated in Section II, Condition 1, of the draft Operation Permit, and such conditions, once revealed to Petitioner, involve additional issues of material fact, Petitioner reserves the right to raise such issues by way of amendment to the Petition, if necessary. Petitioner further reserves the right to raise additional issues as might come to light through the course of discovery in this proceeding.

6. The ultimate facts are that (1) the applicant committed rule and permit violations, as referenced and described in paragraph 5.j., above, and such violations remain outstanding and unresolved; (2) the applicant has not demonstrate that the cement plant will consistently and simultaneously comply with the existing and proposed emission limits for VOCs and NO_x; (3) the applicant has not demonstrated that tires will be burned as a fuel properly and in a manner that complies with all rules and permit conditions, including applicable emission limits; (4) the applicant has not demonstrated that it can effectively control the quality of its raw materials and fuels so as to

assure that it will comply with all applicable emission limits, including but not limited to VOCs and NO_x; (5) the testing and operating data do not demonstrate that the applicant will meet the required reduction in NO_x to 2.8 lb. NO_x/ton of clinker as provided in Table II of the Construction Permit and in Section II, Condition 7.2 and Section III, C.10., H.O., I.1., of the proposed Operation Permit, without, or with, application of a Low NO_x Multi-Stage Calciner (MSC); (6) applicant's cement plant, as presently constructed, is capable of consistently emitting substantially lower levels of mercury and total particulate matter (PM) than the proposed emission limits in the subject permits; (7) the applicant's cement plant is reasonably expected to significantly degrade the surface waters of the nearby Santa Fe River and the underlying Floridan Aquifer by way of atmospheric deposition of mercury and nitrogen (as nitrates); (8) the applicant has failed to demonstrate reasonable assurances that it will comply with its emission limits for VOCs and NO_x, and with all other applicable rules, regulations, and permit conditions, given the unresolved permit violations and operating and testing data, lack of control over the quality of its raw materials and fuel supply, demonstrated problems and poor performance in the burning of tires as a fuel, the applicant's apparent opposition or resistance to the proposed installation of a Low NO_x Multi-Stage Calciner (MSC) and VOC continuous emission monitor, and other possible factors to be determined. Petitioner presently has only limited access to the testing and operating data, reports, operation logs, correspondence, and other documents and testimony that Petitioner intends to obtain through discovery in this proceeding in order to more thoroughly identify the specific and detailed facts supporting its statement of ultimate facts in this Petition.

7. The statutes and rules that warrant reversal or modification of the Department's proposed action include:

Section 403.021(1-6) and (7)(b), Florida Statutes
Section 403.061(8) and (14), F.S.
Section 403.087(1), (4), and (7), F.S.
Section 403.0872(2), F.S.
Section 403.088(1) and (2)(b), F.S.
Section 403.161(1)(b), F.S.
Rule 62-4.030, Florida Administrative Code
Rule 62-4.130, F.A.C.
Rule 62-4.070(1-3) and (5), F.A.C.
Rule 62-4.080(1), F.A.C.
Rule 62-4.100(2) and (3)(b), F.A.C.
Rule 62-4.160(2), (6), (8), (9), (13)(a) and (c)
Rule 62-4.210(2), F.A.C.
Rule 62-4.242(1)(a) and (b) and (2)(a), F.A.C.
Rule 62-204.220(1) and (2), F.A.C.
Rule 62-204.240(1-5), F.A.C.
Rule 62-210.300(2)(a)1. and 2., F.A.C.
Rule 62-212.300(1)(b-d) and (3)(a)2., F.A.C.
Rule 62-212.400(1)(c), (6) and (7), F.A.C.
Rule 62-213.300(2)(d) and (3)(c), (g) and (k)4., F.A.C.
Rule 62-213.420, F.A.C.
Rule 62-213.440(1), (3)(a)1., and (4)(b)4., F.A.C.
Rule 62-296.320(1)(a), F.A.C.
Rule 62-296.407, F.A.C.
Rule 62-296.701, F.A.C.
Rule 62-302.300(11-12), and (14-17), F.A.C.
Rule 62-302.400(1), (10), and (12)(b)1., F.A.C.
Rule 62-302.500(1)(a)6., F.A.C.
Rule 62-302.530, F.A.C.
Rule 62-302.700(1), (6), (9)(c)60., (9)(e)12., and (9)(i)27. F.A.C.
Rule 62-520.300(1)(a), (b), and (f-h) and (3), F.A.C.
Rule 62-520.400(1)(a) and (d), F.A.C.
40 CFR 60.7(a)(1)
40 CFR 60.7(a)(3)
40 CFR 63.4(a)

8. Petitioner seeks the following relief:

a. Denial of the Draft Title V Air Operation Permit No. 0010087-002-AV.

b. Denial of further extensions of authorization to operate under the auspices of a construction permit.

c. Deletion of authorization to use tires as a fuel, including but not limited to Specific Condition 4 and 6 of the Construction Permit and Section III, Condition C.3., of the proposed Operation Permit.

d. A substantial reduction of the emission limit for mercury, to no more than 97 lbs. per year or lower, based upon operating and test data.

e. A substantial reduction of the emission limit for total particulate matter (PM), to no more than 0.13 lbs. per ton of dry feed to the kiln, or lower, based upon operating and test data, and equivalent reductions in the PM emission limits expressed in other terms.

f. Addition of a permit condition limiting the use of coal as a fuel to only low-mercury content coal.

g. Addition of a permit condition providing a compliance schedule requiring modification of the Construction and Operation Permits to impose EPA's emission limit for PM_{2.5} immediately upon the date of implementation specified by EPA.

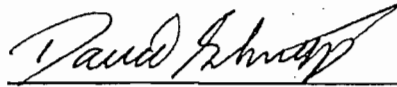
h. Revision of the appropriate permit conditions to provide that all additional construction related to the installation of the VOC continuous emission monitoring system shall be completed by June 1, 2001, all additional construction related to the installation of the Low-NO_x Multi-Stage Calciner (MSC) shall be completed by September 30, 2001, and all compliance testing for the Construction Permit Modifications shall be completed by December 31, 2001.

i. Addition of a permit condition requiring that all continuous emission monitoring results shall be provided and made accessible to the public in real-time data converted to terms that equate to the emission limits established in the permits.

WHEREFORE, Petitioner, Alachua County, pursuant to Sections 120.569 and 403.0872(5), Florida Statutes, and Rules 28-106.111 and 28-106.201, Florida Administrative Code, requests a formal administrative hearing on the above-described matters.

Respectfully submitted this 1st day of March, 2001.

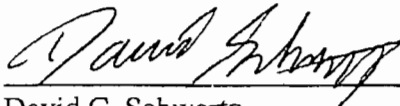
ALACHUA COUNTY ATTORNEY'S OFFICE



David C. Schwartz
Assistant County Attorney
Florida Bar No. 749079
Alachua County Attorney's Office
Post Office Box 2877
Gainesville, FL 32602-2877
(352) 374-5218

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. Mail to Segundo Fernandez, Esquire, Oertel, Hoffman, Fernandez & Cole, P.A., 301 South Bronough Street, Suite 500, Tallahassee, Florida 32301 on this 1st day of March, 2001.



David C. Schwartz
Assistant County Attorney



**FLORIDA ROCK INDUSTRIES, INC.
CEMENT GROUP**

4000 NW CR 235
Newberry, Florida 32669
Telephone: (352) 472-4722 / Fax (352) 472-2449

Fax

To: Al Linero From: Cary Cohrs

Fax: 850-922-6979 Pages: 3 Including Cover

Phone: Date: 2/27/01

Re: CC:

Urgent Please Comment Please Reply

For Review As Requested For Your Information

Comments:

Attached please find Title V notification as printed in The Gainesville Sun. Also the certification to that effect. Where should the original be sent? Jacksonville or Tallahassee?

Regards,
Cary

19726

NO. _____

THE GAINESVILLE SUN
Published Daily and Sunday
GAINESVILLE, FLORIDA

STATE OF FLORIDA
COUNTY OF ALACHUA

Naomi Williams-Jordan

Before the undersigned authority appeared.....
Classified Assistant Manager

Who on oath says that he/she is.....of THE GAINESVILLE SUN, a daily
newspaper published at Gainesville in Alachua County, Florida, that the attached copy of advertisement, being a
Public Notice of Intent
in the matter of.....

in the.....Court, was published in said newspaper in the issue of
February 17,

.....2001

Affiant further says that the said THE GAINESVILLE SUN is a newspaper published at Gainesville, in said Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said Alachua County, each day, and has been entered as second class mail matter at the post office in Gainesville, in Said Alachua County, Florida, for a period of one year next preceding the first publication of the attached copy Of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount for publication in the said newspaper.

Sworn to and subscribed before me this

20.....day February, A.D., 2001
Bonnie W. Gragg
(seal) Notary Public

Naomi Williams-Jordan



Bonnie W. Gragg
MY COMMISSION # CC753925 EXPIRES
September 27, 2002
BONDED THRU TROY FAH INSURANCE, INC

PUBLIC NOTICE OF INTENT TO ISSUE TITLE V AIR OPERATION PERMIT AND PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT MODIFICATION

Florida Department of Environmental Protection, Draft Title V Air Operation Permit No. 001-0087-002-AV, Draft Air Construction Permit No. 001-0087-003-AC

Florida Rock Industries, Inc., Thomson S. Baker Cement Plant, Newberry, Alachua County

The Florida Department of Environmental Protection gives notice of its intent to issue the initial Title V Air Operation Permit (Northeast District permitting authority) and an Air Construction Permit Modification (Bureau of Air Regulation permitting authority) simultaneously to Florida Rock Industries, Inc. (FRI), for the Thomson S. Baker Cement Plant in Newberry located on County Road 235, 2.5 miles Northeast of Newberry, Alachua County.

The modification's purpose is to extend the expiration date of the original construction permit (AC01-267311/PSD-FL-228) for the facility, to set an emission limit for sulfuric acid mist as required by the original permit, to install some NOx control equipment and to require a new VOC continuous emission monitor. Another Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C., but it was necessary to set a limit for sulfuric acid mist pursuant to the existing permit.

The original permit was issued on December 23, 1998, with an initial expiration date of December 31, 1999. The plant first produced clinker on December 23, 1999. The permit required that FRI meet an initial nitrogen oxide (NOx) emission limit of 3.8 pounds per ton of clinker (2.0) and a subsequent limit of 2.0 lb/ton of clinker two years after startup in accordance with the permit. FRI will install any additional control equipment during the two year optimization period to insure compliance with the NOx limit of 2.0 lb/ton of clinker by the end of the period for which approval is being sought. FRI will install equipment to convert the preheater to a low NOx Multi-Stage Calciner (MSC) to meet the lower nitrogen oxide emission limit as described in Table II of the original permit.

The Northeast District will issue the PROPOSED Title V Air Operation Permit and subsequent FINAL Title V Air Operation Permit in accordance with the conditions of the DRAFT Title V Air Operation Permit unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. Also, the Bureau of Air Regulation will issue the Final Air Construction Permit Modification with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions. These permits will be issued simultaneously in accordance with the Title V Air Operation Permit permitting timeframes.

The permitting authority will accept written comments concerning the DRAFT Title V Air Operation Permit and Draft Air Construction Permit Modification issuance schedule for a period of 30 (thirty) days from the date of publication of this Notice. For the DRAFT Title V Air Operation Permit, written comments should be provided to the Department of Environmental Protection

32256-7870. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the DRAFT Title V Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice. For the Draft Air Construction Permit Modification, written comments should be provided to the Department's Bureau of Air Regulation, 2800 Blair Stone Road, Mail Station 45605, Tallahassee, Florida 32399. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed Draft Air Construction Permit Modification, the permitting authority shall issue a Revised Draft Air Construction Permit Modification and require, if applicable, another Public Notice.

32256-7870. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the DRAFT Title V Air Operation Permit, the permitting authority shall issue a Revised DRAFT Title V Air Operation Permit and require, if applicable, another Public Notice. For the Draft Air Construction Permit Modification, written comments should be provided to the Department's Bureau of Air Regulation, 2800 Blair Stone Road, Mail Station 45605, Tallahassee, Florida 32399.

Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed Draft Air Construction Permit Modification, the permitting authority shall issue a Revised Draft Air Construction Permit Modification and require, if applicable, another Public Notice. The permitting authority will issue the permits simultaneously with the attached conditions unless a written petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Modification under Section 120.57, F.S. will not be available for this proposed action. A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department of Environmental Protection, 6990 Commonwealth Boulevard, Suite 310, Tallahassee, FL 32399-3006 (Telephone: (904) 438-9730; Fax: (904) 438-4938). Petitions must be filed within 14 (fourteen) days of publication of the public notice or within 10 (ten) business days of receipt of the notice of intent, whichever occurs first. A petitioner must mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the applicable time period shall constitute a waiver of that person's right to request an administrative determination (Hearing) under Sections 120.569 and 120.57, F.S. For information on the hearing process, see the public notice as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in accordance with the rules of the Florida Administrative Code. The material facts upon which the permitting authority's action is based must contain the following information:

- (a) The name and address of each agency, file or identification number, if known;
(b) The name, address, and telephone number of the petitioner, name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination.
(c) A statement of how and when the petitioner received notice of the agency action or proposed action.
(d) A statement of all disputed issues of material fact. If there are none, the petitioner must so state.
(e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which authorize the petitioner's relief, and:
(f) A demand for relief.

A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 62-100.01, F.A.C. The filing of a petition means that the permitting authority's final action and determination is being contested. The filing of a petition does not constitute a stay of the proceeding. The

petitioner shall be responsible for the costs of the proceeding. The filing of a petition does not constitute a stay of the proceeding. The petitioner shall be responsible for the costs of the proceeding. The filing of a petition does not constitute a stay of the proceeding. The petitioner shall be responsible for the costs of the proceeding.

The complete project file includes the applicable technical evaluations, Draft Air Construction Permit Modification, and the information submitted by the respondent official, exclusive of confidential records under Section 4A3.111, F.S. Interested persons may contact the Administrative Record Review Section at 117 South Meacham Street, Tallahassee, Florida 32301, or call (904) 438-9730 for more information. Technical evaluations and other related information for the proposed action are available for public inspection during normal business hours: 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection, Northeast District Office, 101 Northwest 75th Street, Suite 3, Gainesville, Florida 32607. Telephone: (352) 333-2850; Fax: (352) 333-2850. The complete project file includes the applicable technical evaluations, Draft Air Construction Permit Modification, and the information submitted by the respondent official, exclusive of confidential records under Section 4A3.111, F.S. Interested persons may contact the Administrative Record Review Section at 117 South Meacham Street, Tallahassee, Florida 32301, or call (904) 438-9730 for more information. Technical evaluations and other related information for the proposed action are available for public inspection during normal business hours: 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at:

Modulation is not available in this proceeding. In addition to the above, pursuant to 42 United States Code (U.S.C.) Section 7601(d)(2), any person may petition the Administrator of the EPA within 60 (sixty) days of the expiration of the Administrator's 45 (forty-five) day review period an equal number of days after the expiration of the review period provided in this notice unless the petitioner demonstrates to the Administrator of the EPA that it was impracticable to raise such objections within the comment period of which the ground for such objection arose within the comment period. Filing a petition with the Administrator of the EPA does not stay the effective date of a permit properly issued pursuant to the provisions of Chapter 62, Part 1, F.A.C. Petitions filed with the Administrator of the EPA must meet the requirements of 42 U.S.C. Section 7601(d)(2) and must be filed with the Administrator of the EPA at: U.S. EPA, 401 L Street, N.W., Washington D.C. 20460. An application for the proposed Title V Air Operation Permit, a complete project file is available for public inspection during normal business hours: 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays at:

Dept. of Environmental Protection, Northeast District Office, 705 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590. Telephone: (904) 448-4310; Fax: (904) 448-4358. Dept. of Environmental Protection, Northeast District Office, 101 Northwest 75th Street, Suite 3, Gainesville, Florida 32607. Telephone: (352) 333-2850; Fax: (352) 333-2850.

The complete project file includes the applicable technical evaluations, Draft Air Construction Permit Modification, and the information submitted by the respondent official, exclusive of confidential records under Section 4A3.111, F.S. Interested persons may contact the Administrative Record Review Section at 117 South Meacham Street, Tallahassee, Florida 32301, or call (904) 438-9730 for more information. Technical evaluations and other related information for the proposed action are available for public inspection during normal business hours: 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at:

Dept. of Environmental Protection, Northeast District Office, 113 Magnolia Drive, Suite 4, Tallahassee, Florida 32301. Telephone: (904) 488-0111; Fax: (904) 922-6929. Dept. of Environmental Protection, Northeast District Office, 705 Baymeadows Way, Suite 200B, Jacksonville, FL 32256-7590. Telephone: (904) 448-4310; Fax: (904) 448-4358.

Dept. of Environmental Protection, Northeast District Office, 101 Northwest 75th Street, Suite 3, Gainesville, Florida 32607. Telephone: (352) 333-2850; Fax: (352) 333-2850. The complete project file includes the applicable technical evaluations, Draft Air Construction Permit Modification, and the information submitted by the respondent official, exclusive of confidential records under Section 4A3.111, F.S. Interested persons may contact the Administrative Record Review Section at 117 South Meacham Street, Tallahassee, Florida 32301, or call (904) 438-9730 for more information. Technical evaluations and other related information for the proposed action are available for public inspection during normal business hours: 8:00 a.m. to 5:00 p.m. Monday through Friday, except legal holidays, at:

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Board of County Commissioners

ENVIRONMENTAL PROTECTION DEPARTMENT

201 SE 2ND Avenue, Suite 201 - Gainesville, Florida 32601

Phone: (352) 264-6800

Suncom: 651-6800

Fax: (352) 264-6852

J. Chris Bird, Director

FAX

Date: Feb 20, 2001

Pages (including cover):

To: HOWARD Rhodes

Agency: FDEP
AIR Res - Mngmt.

From: JOHN MOUSA

Fax: 850-922-6979

Voice:

COMMENTS:



ALACHUA COUNTY BOARD OF COUNTY COMMISSIONERS

P.O. Box 2877 • Gainesville, Florida 32602-2877

Tel. (352) 374-5210 • Fax (352) 338-7363

1-800-491-4496 (toll free) • Suncom 651-5210

Commissioners' E-Mail: bocc@co.alachua.fl.us

Home Page: www.co.alachua.fl.us

Board of County Commissioners

RECEIVED

February 20, 2001

FEB 22 2001

DIVISION OF AIR
RESOURCES MANAGEMENT

247 rec 2/20

*Claim
du
From: Howard
2/23*

Commission

Penelope Wheat
Chair

Dave Newport
Vice Chair

Charles Chestnut, III

Chuck Clemons

Robert Hutchinson

Administration

Randall H. Reid
County Manager

February 20, 2001

Mr. Kirby Green
Deputy Secretary
Florida Department of Environmental Protection
3900 Commonwealth Boulevard
Tallahassee, Florida 32399

Re: DEP File No. 0010087-003-AC/PSD-FL-228-A (Draft Title V Construction Permit Modification No. 0010087-003-AC and Operation Permit No. 0010087-002-AV) and OGC Case No. 00-2214-01-AP (VOC violations)

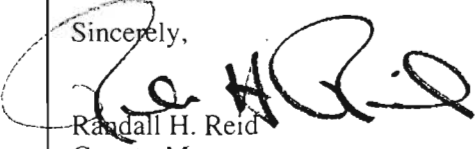
Dear Mr. Green:

On behalf of Alachua County, I respectfully request to be notified of, and to be given an opportunity to be present during, any meetings or discussions between DEP and Florida Rock Industries, Inc., concerning the above-referenced Title V permits.

In addition, I offer my strongest recommendation that DEP not enter into a Consent Order or settlement of the outstanding enforcement action in OGC Case No. 00-2214-01-AP without resolving all of Florida Rock's pending objections to certain conditions of the proposed Title V permits. I believe that DEP will be in a weaker position to defend the proposed permit conditions for continuous emission monitoring for volatile organic compounds (VOCs), and perhaps other conditions as well, if it settles the enforcement case prior to resolving Florida Rock's objections to the proposed permits. If and when a settlement of the enforcement case occurs, it should only be pursuant to an agreement whereby Florida Rock admits to the violations, so that the violations may be used as a basis for imposing the conditions of the proposed permits.

Thank you kindly for your consideration in this matter.

Sincerely,


Randall H. Reid
County Manager

JCB/dcs

cc: Douglas Beason, Esq.
Trina Vielhauer, Esq.
Howard Rhodes
Chris Kurtz, DEP Northeast District
Segundo J. Fernandez, Esq.
David C. Schwartz, Esq.

An Equal Opportunity Employer M.F.V.D.





Department of Environmental Protection

Jeb Bush
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

February 15, 2001

FACSIMILE TRANSMITTAL
CERTIFIED – RETURN RECEIPT

Mr. Jim Konish
Florida Administrative Law Reports, Inc.
Post Office Box 385
Gainesville, Florida 32602

RECEIVED

FEB 19 2001

Dear Mr. Konish:

BUREAU OF AIR REGULATION

Florida Rock – Newberry Cement Plant
Alachua County - Air Program
Facsimile Transmittal

On February 14, 2001 this office received a facsimile transmittal from your office. The fax contained (copies attached):

Your letter dated May 2, 2000.

My response dated May 23, 2000.

A letter signed by W. Douglas Beason, Esq. dated October 18, 2000.

As no action was requested in the fax, maybe you had some other intent, if so please clarify. Actions requested in the May 2, 2000 request were responded to.

On January 26, 2000, the Northeast District (NED), of the Department of Environmental Protection sent you a copy of the proposed "Draft" Title V operating permit and other pertinent documents in relation to the subject facility.

As always, files at NED are available for your review. Should you have any questions, please feel free to contact me at 904-448-4310 (ext. 235).

Sincerely,

Christopher L. Kirts, P.E.
Air Program Administrator

CLK:db
Attachments (3)

cc: Trina Vielhauer, Office of General Council (OGC)
Doug Beason, OGC
Robert Gough, OGC
Larry Morgan, OGC
Clair Fancy, Division of Air Resource Management (DARM)
Ernest E. Frey, P.E., District Director, Northeast District

"More Protection, Less Process"

Printed on recycled paper.



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

January 29, 2001

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No. 0010087-003-AC/PSD-FL-228A
Thompson S. Baker (Newberry) Cement Plant

Dear Mr. Baker:

Due to a typographical error on page 2 of 4 of the January 26, 2001 Technical Evaluation and Preliminary Determination for the above referenced project, the permit extension date was incorrectly stated. Please replace that page with the enclosed corrected page.

Sincerely,

C. H. Fancy, P.E., Chief
Bureau of Air Regulation

CHF/pa

Enclosure

cc: Fred W. Cohrs, FRI
Gregg Worley, EPA
John Bunyak, NPS
Kris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
W. Douglas Beason, Esq. DEP OGC

James J. Konish, Esq., FPLW
Segundo J. Fernandez, Esq., OHF&C
Arthur Saarinen
Chair, Alachua County Commission
Chris Bird, Alachua County EPD
Rob Luna, NCFGF

"More Protection, Less Process"

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TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

reducing zone of the calciner. Operating results obtained with the multi stage combustion process prove that basic NO_x emissions is reduced by up to 50%.”

An evaluation of the system described above was given in a report prepared by Schreiber, Yonley, & Associates for Alachua County.⁵ According to the report, “the Newberry plant, on the other hand, has the advantage of an inherently low-NO_x design.” “The plant does have the option of adding staged combustion as a NO_x contingency control. This method introduces fuel at the feed end of the kiln or at the precalciner vessel, creating a strongly reducing environment in which more NO_x is destroyed. The technology is used in both new construction and kiln retrofits. The Portland Cement Association Report on NO_x formation and Variability in Portland Cement Kiln Systems, Potential Control Techniques and Their Feasibility and Cost Effectiveness published in December 1998 reports that industry feedback indicated NO_x reduction potential with this control is 30 to 40 percent compared to conventional precalciner kilns.”

The Department does not necessarily agree with all aspects of the Schreiber analysis, but does agree on the discussion regarding staged combustion. The full report may be viewed at the Alachua County website.⁶

FRI proposes to use tires with propane backup as fuel burned under reducing conditions in the lower section of the MSC. Coal will be burned under subsequent oxidizing conditions in the higher section of the MSC. Additional tertiary air from the clinker cooler will insure good burnout and conversion of most CO to CO₂ without significant NO_x formation.

Compliance with the NO_x limit by December 31, 2001 will be confirmed by the continuous emission monitoring system (CEMS). The permit will be extended until **March 31, 2001** to allow conversion of the precalciner, conduct additional fine-tuning, and provide the Department and FRI with time to review the results. This review may allow the Department to exercise the condition in Table II of the permit to “revise the limit to less than 2.8 lb/ton clinker (30-day rolling average) based on compliance test and continuous emissions monitoring data.”

SO₂ Control. The interim SO₂ emission limit is 0.28 lb/ton or 28.8 lb/hr. The Department is required to issue the final SO₂ limits within 120 days following receipt of all test results required by this permit. An initial stack test conducted on the kiln indicated an emission rate of 1.4 lb/hr. This is an extremely low value. For example, kilns in certain parts of the country emit SO₂ at levels from 100 to 1000 times greater than indicated by the first FRI tests. Fortunately raw materials in Florida, such as the limestone, contain little iron pyrites that contribute to SO₂ formation. Early indications are that the kiln does indeed function as described in the original BACT determination. The sulfur is being removed in the alkaline environment of the kiln, preheater, and raw mill and ultimately incorporated into the clinker.

The single stack test results are not sufficient to set a final limit for SO₂. In fact, at the emission rate achieved to-date, the plant would not have been subject to a BACT-based SO₂ emission limit. The Department will wait until the applicant has submitted three months worth of CEMS data for this pollutant prior to revising the BACT limit for SO₂. The Department has reasonable assurance that the kiln is operating well within its interim permitted SO₂ limits.

Sulfuric Acid Mist Control.

FRI submitted stack test results for sulfuric acid mist (SAM). The tests indicated an emission rate of 0.000003 lb/ton of clinker or 0.0003 lb/hr. This equates to annual emissions of 0.0012 tons per year (TPY), which is much less than the threshold of 7 TPY normally requiring a BACT determination. Nevertheless the permit requires a limit.

The Department reviewed data from the EPA RACT/BACT/LAER Clearinghouse. The facilities include Tarmac (Miami), Florida Crushed Stone (Brooksville), Roanoke (Virginia), and Puerto Rican Cement. BACT-based emission limits ranged from 0.014 to 0.234 lb/ton of clinker. The Department will set a limit



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 187-00-09

January 22, 2001

VIA FAX

Mr. Lalit Lalwani
Florida Department of
Environmental Protection
101 N.W. 75th Street, Suite 3
Gainesville, FL 32607-1609

Subject: Beryllium Emission Measurements
Florida Rock Industries, Inc.
Newberry, Florida
Permit No. AC01-267311

Dear Mr. Lalwani:

Due to an unscheduled plant shutdown, the emission measurements for beryllium (EPA Method 104) on the kiln/raw mill stack at the Thompson S. Baker Cement Plant have been postponed until February 6, 2001. The test crew will arrive on site at 7:00 a.m.

If you have any questions concerning this schedule change, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES

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

JBK:wa

- c: Mr. Al Linero, FDEP, Tallahassee
- Mr. Howard Rhodes, FDEP, Tallahassee
- Mr. Chris Kirts, FDEP, Jacksonville
- Mr. George Townsend, FRI
- Mr. Cary Cohrs, FRI
- Mr. Fred Cohrs, FRI
- Mr. Segundo Fernandez, Oertel, Hoffman



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

KA 187-00-09

January 11, 2001

RECEIVED

JAN 16 2001

BUREAU OF AIR REGULATION

VIA FAX AND MAIL

Mr. Lalit Lalwani
Florida Department of
Environmental Protection
101 N.W. 75th Street, Suite 3
Gainesville, FL 32607-1609

Subject: Florida Rock Industries, Inc.
Newberry, Florida
Permit No. AC01-267311

Dear Mr. Lalwani:

Koogler & Associates is scheduled to conduct emission measurements for beryllium (EPA Method 104) on the kiln/raw mill stack at the Thompson S. Baker Cement Plant on Wednesday, January 24, 2001. The test crew will arrive on site at 7:00 a.m.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

KOOGLER & ASSOCIATES


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

JBK:wa

c: Mr. Al Linero, FDEP, Tallahassee
Mr. Howard Rhodes, FDEP, Tallahassee
Mr. Chris Kirts, FDEP, Jacksonville
Mr. George Townsend, FRI
Mr. Cary Cohrs, FRI
Mr. Fred Cohrs, FRI
Mr. Segundo Fernandez, Oertel, Hoffman

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

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TERRY COLE
SEGUNDO J. FERNANDEZ
SCOTT W. FOLTZ
KENNETH F. HOFFMAN
CHRISTOPHER D. JOHNSTON
KENNETH G. OERTEL
PATRICIA A. RENOVTCH

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<http://www.ohfc.com>

DEC 28 2000

BUREAU OF AIR REGULATION

December 27, 2000

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

Via Facsimile and U.S. Mail

Christopher L. Kirts, P.E.
Air Program Administrator
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

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DEC 28 2000

BUREAU OF AIR REGULATION

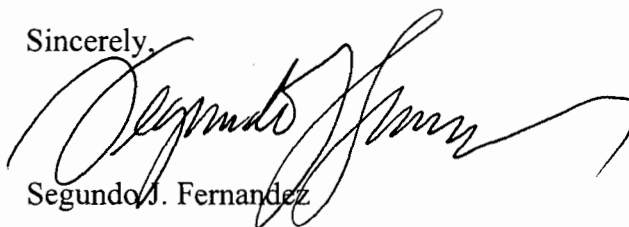
Re: Waiver of Permit Application Processing Time Periods Under Sections 120.60(1),
403.0872, and 403.0876, Florida Statutes
Florida Rock Industries, Inc.
Facility ID 0010087, Initial Title V Permit Application

Dear Gentlemen:

As you know, we represent Florida Rock Industries, Inc. with respect to its Thompson S. Baker Cement Plant in Newberry, Florida. Please find enclosed a Waiver of Permit Application Processing Time Periods Under Sections 120.60(1), 403.0872, and 403.0876, Florida Statutes, for the above-referenced facility and initial Title V Permit Application.

Please do not hesitate to call me if you have any questions.

Sincerely,



Segundo J. Fernandez

c: Kirby B. Green, III Doug Beason
John Baker John B. Koogler
Fred Cohrs Al Linero
Cary Cohrs

WAIVER OF PERMIT APPLICATION PROCESSING TIME PERIODS
UNDER SECTIONS 120.60(1), 403.0872, AND 403.0876 FLORIDA STATUTES

Permit Application No.: Facility ID 0010087, Initial Title V Permit Application.

Applicant's Name: Florida Rock Industries, Inc.

The undersigned has read sections 120.60(1), 403.0872, and 403.0876, Florida Statutes, and fully understands the applicant's rights under those sections.

With regard to the above referenced permit application, the applicant hereby with full knowledge and understanding of its rights under Sections 120.60(1) and 403.0876, Florida Statutes, waives the right under Sections 120.60(1), 403.0872, and 403.0876, Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Protection within the 90-day time period prescribed in Sections 120.60(1), and 403.0876, Florida Statutes.

In specific, this letter waives the 30-day and 60-day completeness reviews of the information provided to the Department on December 23, 1999. This waiver shall in no way limit the Department's ability to request information prior to the expiration of this waiver. This waiver shall expire March 31, 2001, at which time all processing time clocks will resume.

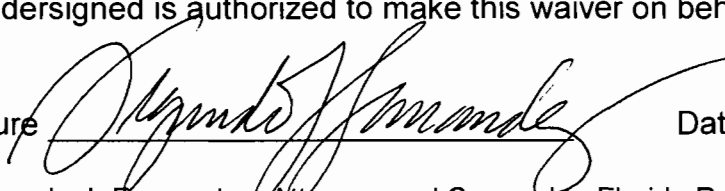
With regard to the above referenced permit application, the applicant hereby with full knowledge and understanding of its rights under Section 403.0872, Florida Statutes, waives the right under Section 403.0872, Florida Statutes, to have the application processed by the State of Florida Department of Environmental Protection within the time periods prescribed in Section 403.0872, Florida Statutes.

Said waiver is made freely and voluntarily by the applicant, is in its self interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Protection.

This waiver shall expire on the 31st day of March 2001.

The undersigned is authorized to make this waiver on behalf of the applicant.

Signature



Date

12/27/00

By: Segundo J. Fernandez, Attorney and Counsel to Florida Rock Industries, Inc.

State of Florida
County of Leon

Sworn to (or affirmed) and subscribed before me this 27th day of December, 2000, by Segundo J. Fernandez. Who is personally know or has produced _____ identification.



Notary





UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

Office of Air Quality Planning and Standards

Emission Standards Division

Minerals and Inorganic Chemicals Group, MD-13

Research Triangle Park, NC 27711 USA

TO: JOHN REYNOLDS

COMPANY/OFFICE: FL DEP

DATE:

12/27/00

TEL. NUMBER

850 921 9536

FAX NUMBER

850 922 6979

FROM: Joseph Wood, P.E.

EMAIL: wood.joe@epa.gov

FAX NUMBER:

(919) 541-5600

TEL. NUMBER:

(919) 541-5446

REMARKS

VARIOUS PAGES FROM OUR DATA ANALYSIS MEMO FOR PORTLAND CEMENT KILNS, INDICATING Be DATA. IF YOU NEED TO REFERENCE THIS, IT'S FROM DOCKET NO. A-92-53, DOCKET ITEM II-13-62.



RESEARCH TRIANGLE INSTITUTE

Center for Environmental Analysis

February 21, 1996

TO: Joseph Wood, ESD/MICG (MD-13)
U. S. Environmental Protection Agency
Research Triangle Park, NC 27711

FROM: Elizabeth Heath *EAK*

SUBJECT: Emissions of Particulate Matter, Metals, Hydrogen
Chloride, and Total Hydrocarbons from Cement Kilns

REFERENCE: Information Gathering and Analysis for the Portland Cement
Manufacturing Industry NESHAP
EPA Contract 68-D1-0118
ESD Project 91/44
RTI Project 6173-137

Summary

The EPA requested a comparison of emissions of selected compounds from cement kilns that burn and do not burn hazardous waste. The compounds included metals (exclusive of mercury), hydrogen chloride (HCl), particulate matter (PM), and total hydrocarbons (THC). In this memo, kilns that burn hazardous waste will be referred to as "HW" kilns while those that do not burn hazardous waste will be referred to as "NHW" kilns. The purpose of the comparison was to determine: (1) for purposes of estimating the percentage of kilns that could be affected by the MACT standards (that are under consideration), whether the NHW and HW data overlapped and could be combined into a single data set, and (2) the estimated percentage of kilns that could be affected by the MACT standards that are under consideration for emissions of PM, HCl, and THC.

Discussion

Emissions Data Extraction

Emissions data for HW kilns were obtained from references 1 through 5, while emissions data for NHW kilns were obtained from references 1, 5, and 6 through 21. Emissions data were averaged per kiln per testing condition.

Many of the emissions listed in the references were converted to appropriate units, [$\mu\text{g}/\text{dscm}$ (for metals), gr/dscf (for PM), and ppmv (for HCl and THC)], at 68°F and 7 percent oxygen. Many references provided concentrations in the correct units based on a standard temperature other than 68°F. When the standard temperature could not be determined from the reference, it was assumed that standard temperature was 68°F. Appendix A describes how emissions were extracted from references 2 through 22. (Emissions data were taken directly from reference 1.) Several reports contained emissions data that could not be converted to the appropriate unit at 68°F and 7 percent oxygen; these reports are listed in Appendix B with an explanation of why the data were not used.

Treatment of non-detected emissions data

The treatment of non-detected (ND) data depended on how many

measurements at a test site (per kiln per testing condition) were ND. Typically three emissions measurements were conducted per test condition per kiln. If all three measurements were ND, the data were excluded. If one of three measurements was detected, half of the ND concentrations were averaged with the detected concentration. When only one measurement was made, only detected values were used.

Emissions data

Average emissions (per kiln per testing condition) for PM, metals, THC as propane, and HCl are contained in Appendix C for NHW kilns and in Appendix D for HW kilns. The data are plotted in Figures 1 through 12 (on pages 10 to 22). A listing of the figures is provided below.

<u>Figure number</u>	<u>Average emissions for NHW and HW kilns</u>
1	antimony
2	arsenic
3	beryllium
4	cadmium
5	chromium
6	lead
7	manganese
8	nickel
9	selenium
10 (a)	electrostatic precipitator-controlled PM
10 (b)	fabric filter-controlled PM
11	hydrogen chloride
12	THC as propane

Antimony average emissions

Table 1 lists the minimum, maximum, average, and standard deviation of the HW antimony data. There were no NHW emissions data. As shown in Figure 1, approximately 92 percent of the HW data were below 10 $\mu\text{g}/\text{dscm}$. (The value of 10 $\mu\text{g}/\text{dscm}$ was determined visually from Figure 1.) The 13 HW emission points ranged from 0.2 $\mu\text{g}/\text{dscm}$ to 38 $\mu\text{g}/\text{dscm}$ and averaged to 5.1 $\mu\text{g}/\text{dscm}$.

Table 1. Antimony emissions for HW cement kilns

	NHW kilns	HW kilns
minimum ($\mu\text{g}/\text{dscm}$)	--	0.2
maximum ($\mu\text{g}/\text{dscm}$)	--	38
average ($\mu\text{g}/\text{dscm}$)	--	5.1
standard deviation of the data	--	10
number of points*	--	13
percent of data exceeding:		
10 $\mu\text{g}/\text{dscm}$ **	--	8

*The number of averages (determined per kiln per test condition) is listed.

**Value visually determined from a plot of the HW data points.

Arsenic average emissions

Table 2 lists the minimum, maximum, average, and standard deviation of the arsenic data. As shown in Figure 2, approximately 88 percent of the NHW data and 83 percent of the HW data were below 5 $\mu\text{g}/\text{dscm}$. (The value of 5 $\mu\text{g}/\text{dscm}$ was determined visually from Figure 2.) The 8 NHW emission points ranged from 0.2 $\mu\text{g}/\text{dscm}$ to 10 $\mu\text{g}/\text{dscm}$ while the 23 HW emission points ranged from 0.4 $\mu\text{g}/\text{dscm}$ to 30 $\mu\text{g}/\text{dscm}$.

Table 2. Arsenic emissions for cement kilns

	NHW kilns	HW kilns
minimum ($\mu\text{g}/\text{dscm}$)	0.2	0.4
maximum ($\mu\text{g}/\text{dscm}$)	10	30
average ($\mu\text{g}/\text{dscm}$)	2.6	4.7
standard deviation of the data	3.1	7.7
number of points*	8	23
percent of data exceeding:		
5 $\mu\text{g}/\text{dscm}$ **	12	17

*The number of averages (determined per kiln per test condition) is listed.

**Value visually determined from a plot of the NHW and HW data points.

Beryllium average emissions

Table 3 lists the minimum, maximum, average, and standard deviation of the beryllium data. There were only three NHW beryllium data points. As shown in Figure 3, all of the NHW data and approximately 81 percent of the HW data were below 1 $\mu\text{g}/\text{dscm}$. (The value of 1 $\mu\text{g}/\text{dscm}$ was determined visually from Figure 3.) The 3 NHW emission points were 0.2 $\mu\text{g}/\text{dscm}$, 0.30 $\mu\text{g}/\text{dscm}$, and 0.31 $\mu\text{g}/\text{dscm}$ while the 21 HW emission points ranged from 0.05 $\mu\text{g}/\text{dscm}$ to 2.2 $\mu\text{g}/\text{dscm}$.

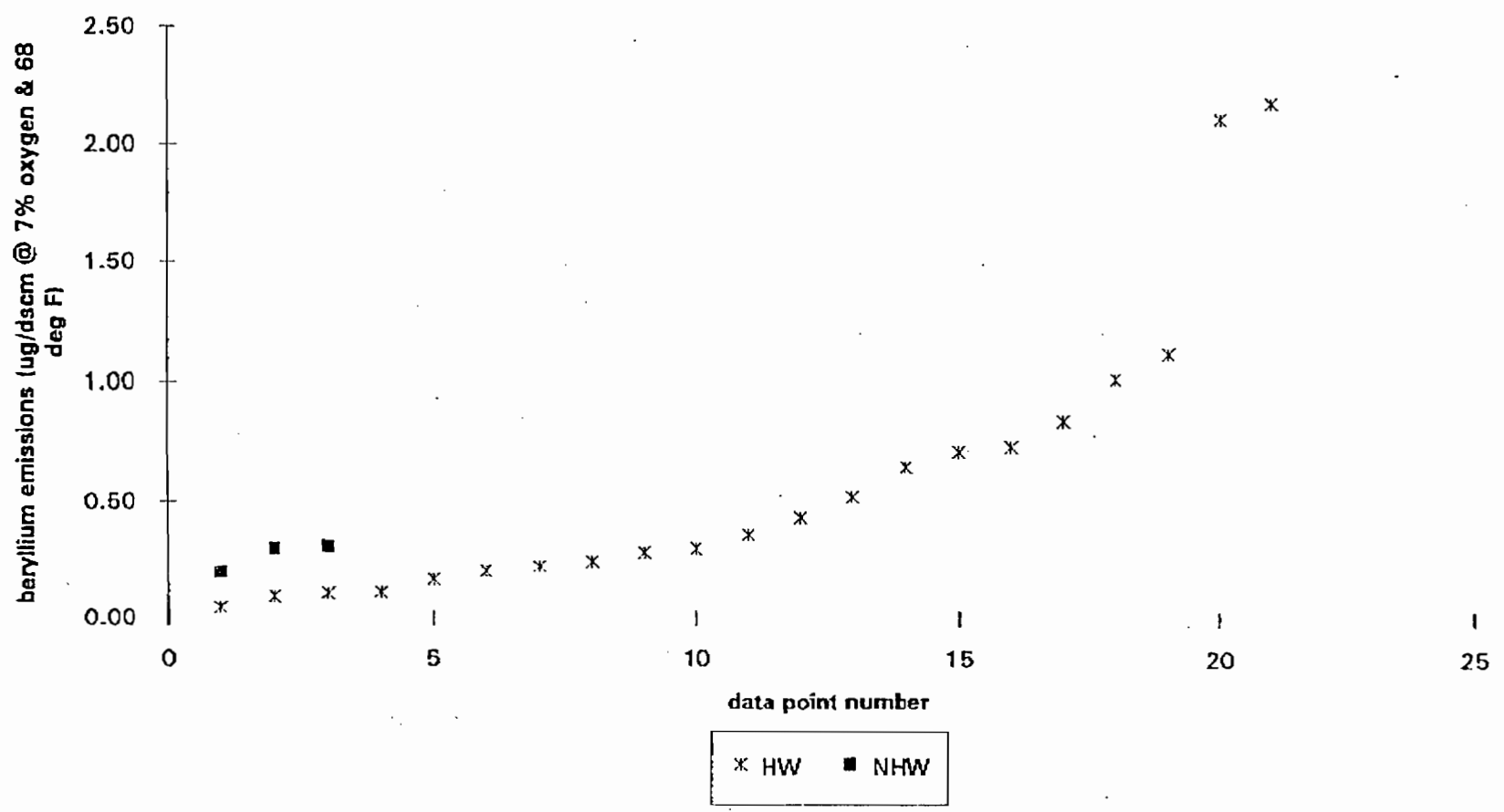
Table 3. Beryllium emissions for cement kilns

	NHW kilns	HW kilns
minimum ($\mu\text{g}/\text{dscm}$)	0.2	0.05
maximum ($\mu\text{g}/\text{dscm}$)	0.31	2.2
average ($\mu\text{g}/\text{dscm}$)	0.27	0.59
standard deviation of the data	0.06	0.6
number of points*	3	21
percent of data exceeding:		
1 $\mu\text{g}/\text{dscm}$ **	0	19

*The number of averages (determined per kiln per test condition) is listed.

**Value visually determined from a plot of the NHW and HW data points.

Figure 3. Beryllium emissions from cement kilns



OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

F:\Document\TPA\Ltr\2320-2AppExt-11-17.wpd
 TIMOTHY P. ATKINSON
 JEFFREY BROWN
 M. CHRISTOPHER BRYANT
 C. ANTHONY CLEVELAND
 TERRY COLE
 SEGUNDO J. FERNANDEZ
 SCOTT W. FOLTZ
 KENNETH F. HOFFMAN
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<http://www.ohfc.com>

December 20, 2000

Via Facsimile and U.S. Mail

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

Re: FDEP Air Construction Permit No. AC01-267311 / PSD-FL-2²~~18~~
 Facility No.: 0010087

Dear Mr. Rhodes:

We represent Florida Rock Industries, Inc. with respect to its Thompson S. Baker Cement Plant in Newberry, Florida. On July 17, 2000 we filed a request for extension of the above referenced permit. On November 17, 2000, FRI granted the Department an additional 45 days to review the request.

We understand that the 90-day processing time clock, under Section 120.60 F.S. is about to run out, and that the Department needs additional time to process FRI's extension request. We are pleased to grant the Department an extension to review the request up to and including March 31, 2001. This constitutes a waiver of the processing time clock and is given to facilitate resolution of all outstanding questions and issues.

Additionally, the July 17, 2000, request asked that the construction permit, referenced above, be extended until January 31, 2001. We hereby modify that request and ask that the construction permit be extended until March 31, 2001.

Please do not hesitate to call me if you have any questions.

Sincerely,



Segundo J. Fernandez
 Timothy P. Atkinson

c: Kirby B. Green, III
 John Baker
 Fred Cohrs
 Cary Cohrs
 Doug Beason
 John B. Koogler
 Al Linero

* FRI needs time to submit further details of NOx controls strategy & construction to meet December, 2001 milestone of 2.8 lb NOx / ton clinker. Also VOC assurance, Bo data, etc. Dec 12/26

Florida Rock Meeting 12/15/00

Trina Vielhauer	DEP/OFC	850/921-8875
Fred W. Cohrs	FRI	904/355-1781
Segundo J. Fernandez	FRI/OHFC	850/521-0700
TIM ATKINSON	FRI/OHFC	same
Chris Kints	DEP/NED	904-448-4310(235)
Rick Banks	DEP/NED	904-448-4310 x 234
ERNEST FREY	DEP/NED	904-448-4300 x 201
AL LINERO	DEP/BAR	850-921-9523
Clair Fancy	DEP/BAR	850 921 9503
HOWARD Rhodes	DEP/DAR m	850 488 0114
Doug BERSON	DEP/OBL	850-921-9624

THOMPSON S. BAKER CEMENT PLANT
Newberry, Florida

PYRO PROCESSING SYSTEM CONVERSION PLAN
TO
REDUCE NO_x TO PERMITTED LIMIT

For Discussion with the
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
AIR DIVISION

December 15, 2000

Thompson S. Baker Cement Plant
Proposed Modifications to the Pyro-Processing System
Reason for Modification: Reduce NO_x Emissions

Florida Department of Environmental Regulation Air Construction Permit No. AC01-267311 allows NO_x emissions from the kiln system to be no more than 3.8 lbs/ton clinker for the initial two (2) years of operation and no more than 2.8 lbs/ton clinker thereafter.

Test results show the present NO_x emissions to be in the 3.5 lbs/ton clinker range. The results are reported on a 30 day rolling average. The company is of the opinion that it can not meet the 2.8 lbs/ton clinker limit on a continuous basis without modification to the preheater configuration.

NO_x reductions can be achieved primarily by reducing the concentration of heat input. To accomplish this, the total fuel requirements must be split into more than one firing point, and by employing state of the art multi stage burner technology at the TSB Cement Plant. Initially, the plant started with two firing points: One at the kiln discharge end and another one in the precalciner. The kiln burner is of the Polysius low NO_x design. Its effectiveness in reducing NO_x is difficult to determine, but in its entirety, the system was designed to produce low NO_x emissions, as well as meeting all other permitted limits.

Florida Rock's plan is to achieve additional NO_x reduction and be in compliance with the more restrictive NO_x permit limit by the end of January 2002.

FRI's construction permit provides for the use of Tire Derived Fuel (TDF) as a replacement for coal to the extent of 30% of the coal used. As the major source of NO_x is the nitrogen contained in the coal, the replacement of coal with an equivalent heat source without nitrogen, such as gas derived from TDF, a proportionate reduction in NO_x can be expected.

The gas so produced will be fired in the same area of the precalciner where the coal is presently burnt. The result will be, that the precalciner, which takes 60% of all fuel consumed in the preheater/kiln system, will be composed of 50% coal and 50% nitrogen free gas.

Only one gasifier has been installed in the cement industry in the world so far. Development work of the system is still in progress, mainly to improve the

mechanism to handle the residue, consisting of carbon and steel belts. As a means of complying with the NOx limits by the start of year 2002, as required, the gasifier is not suitable. An in-service date prior to mid-year 2003 can not be guaranteed. However, FRI intends to purchase this system as soon as its performance can be assured.

In the meantime, FRI proposes the following:

1. Install an additional firing point at the inlet to the kiln. Whole used automobile and truck tires will be introduced at this process point to supply the fuel. Processing considerations will limit coal replacement to 10%.

In the event that tires are temporarily unavailable or the tire feeding system malfunctions, propane gas will be used in their place.

2. Divert a portion of the tertiary air, which now enters the area in the calciner where the majority of the total fuel is burnt, to the upper area of the calciner.
3. Install a tire handling system.
4. Reroute the gas flow from the calciner through a new mixing chamber, to slow the gas velocity and improve blending, after which the gas is exposed to a new oxygen supply delivered through the tertiary air duct to complete the fuel combustion and convert most CO to CO₂.

These four construction steps will be simultaneously executed. The modified system will assure the reduction of NOx emissions to the permitted level.

Mockups of the modifications are made part of this report.

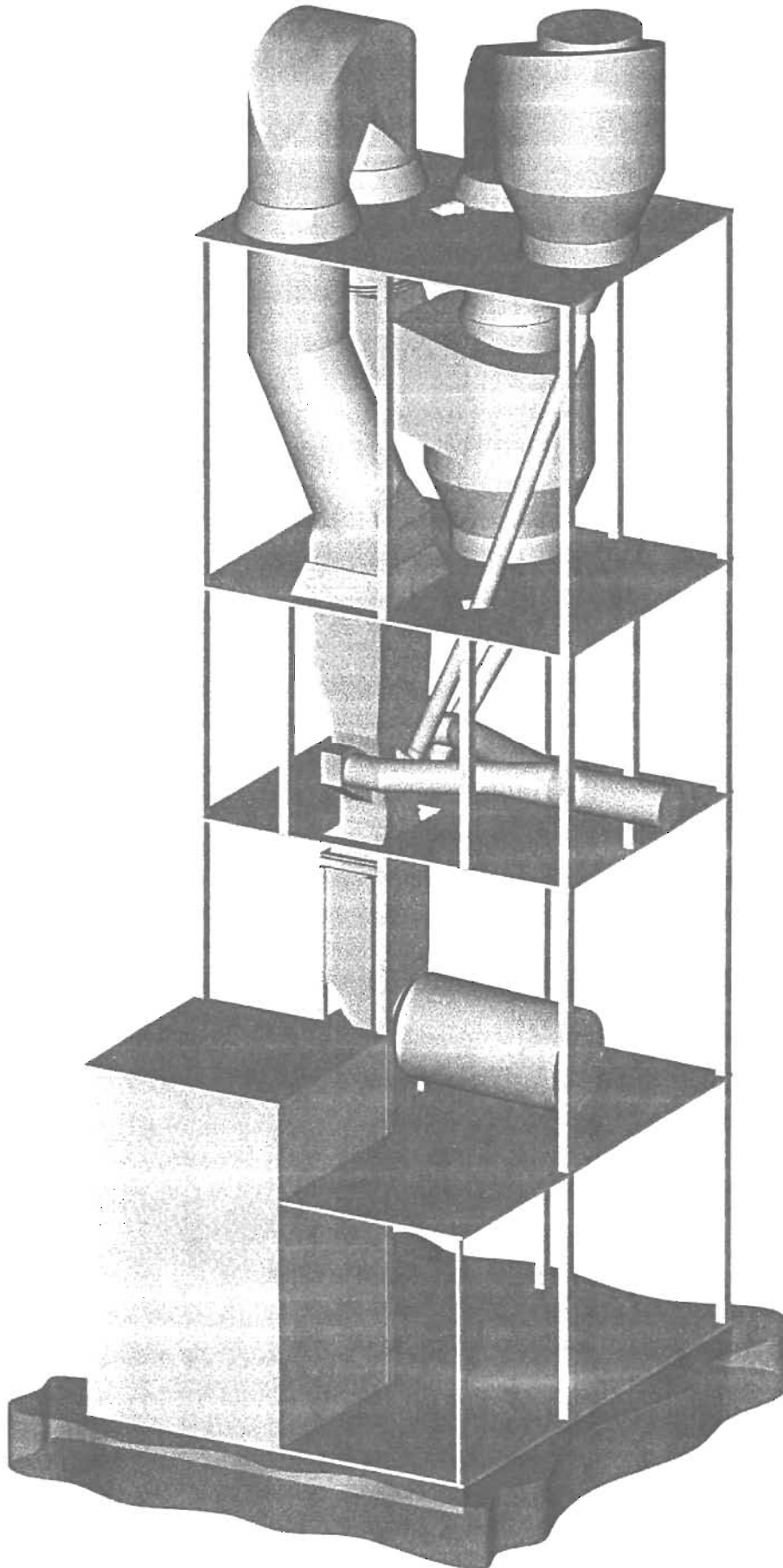
The conceptual views have been developed by Polysius Corp. and describe the changes in the preheater/calciner cyclone and duct configuration.

Polysius also briefly described the method of NOx reduction this technology provides.

The attached engineering and construction schedule indicates that the project can be completed by the first month of 2002.

Engineering and Construction Schedule:

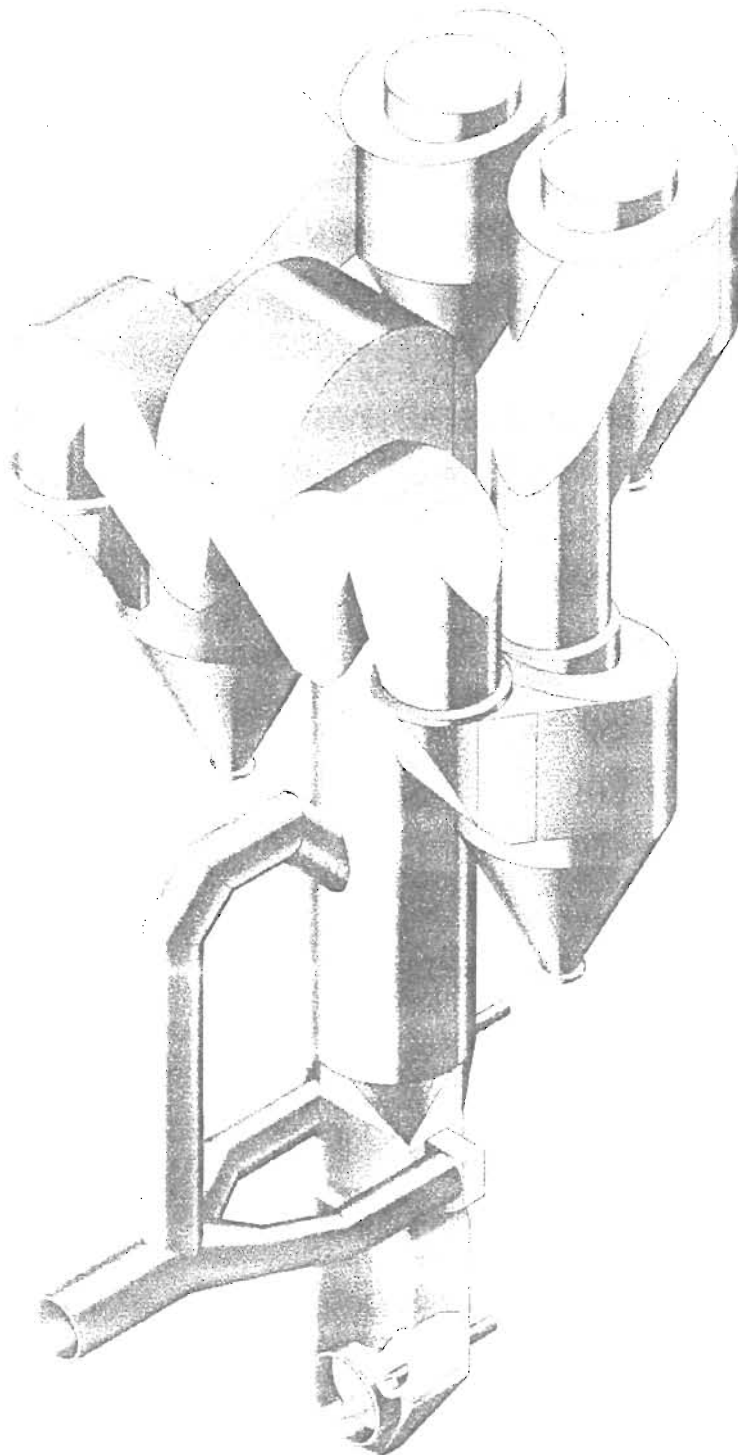
	Completion Date
1. Receive proposal from Polysius	12/22/00
2. Negotiate contract for Engineering and Supply	01/20/01
3. Fabrication of ducts and equipment	08/20/01
4. Receive construction proposal: including structural, civil and electrical engineering	05/20/01
5. Commence construction	09/01/01
6. Shut down for tie-ins	12/15/01
7. Start modified system	01/01/02
8. Test for NOx emissions and permit compliance	03/01/02



**Krupp
Polysius**

A subsidiary of
ThyssenKrupp
USA, Inc.

PREPOL[®]-MSC



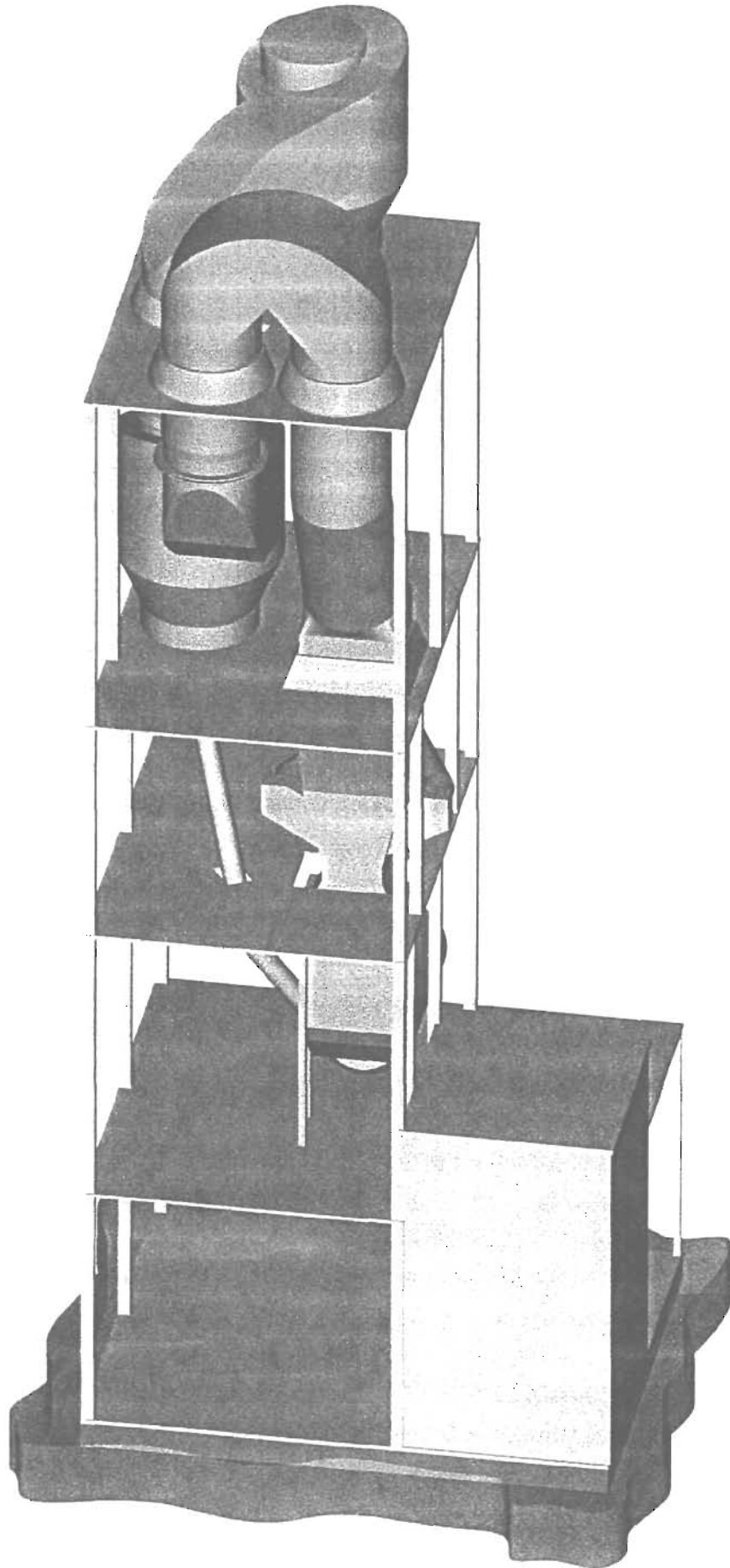
The MSC process involves no extra operating costs, reducing emissions by staggered introduction of the fuel and tertiary air, which causes the combustion to take place in several stages.

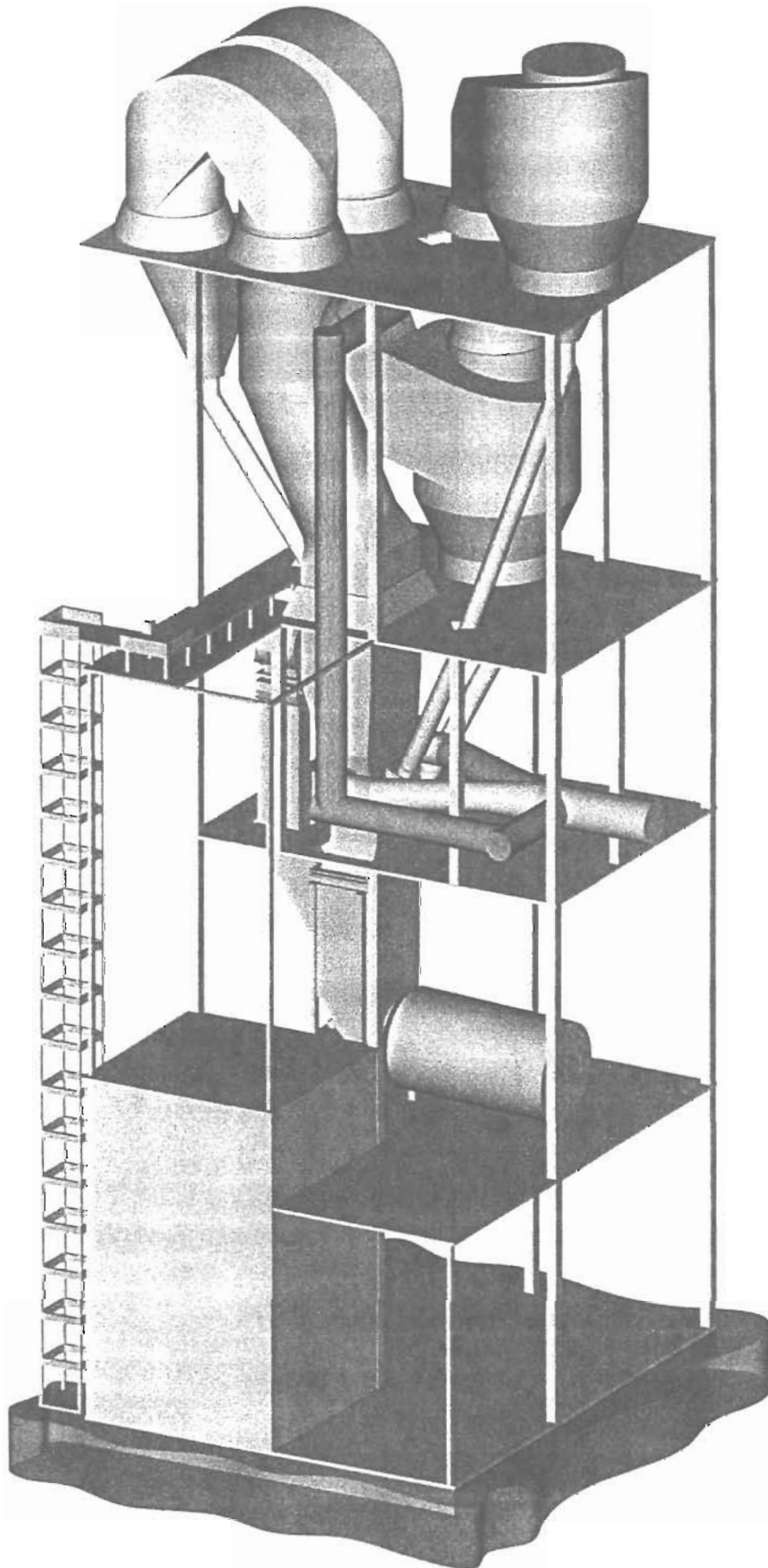
In the first stage, the nitrogen oxides generated in the sintering zone of the rotary kiln are reduced by the introduction of approximately 10% of the total fuel utilizing fuels such as tires, a separate inlet burner, or other replacement fuels. The fuel is injected against the direction of flow of the kiln gases and is pyrolyzed in its gas phase. In the reducing atmosphere, which is formed, the nitrogen oxides are converted into nitrogen, which is not harmful to the environment.

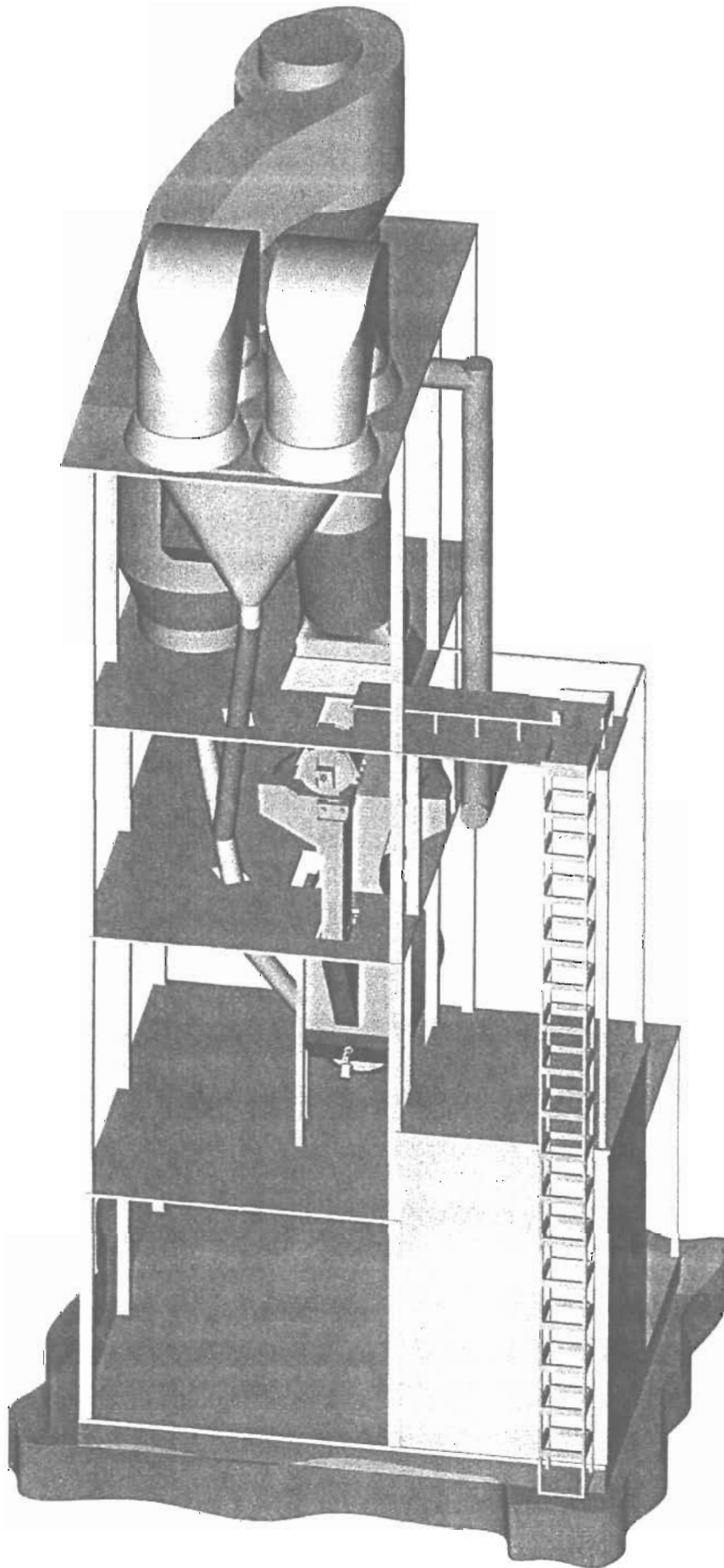
In order to prevent new NO_x from being generated in the calciner, the calcining fuel also has to be burnt under reducing conditions. This is achieved by staggered introduction of the combustion air, so that the fuel is first burnt under reducing conditions and then completed under oxidizing conditions.

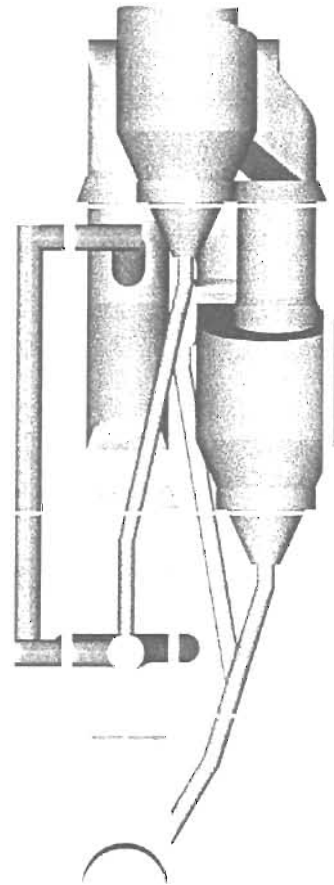
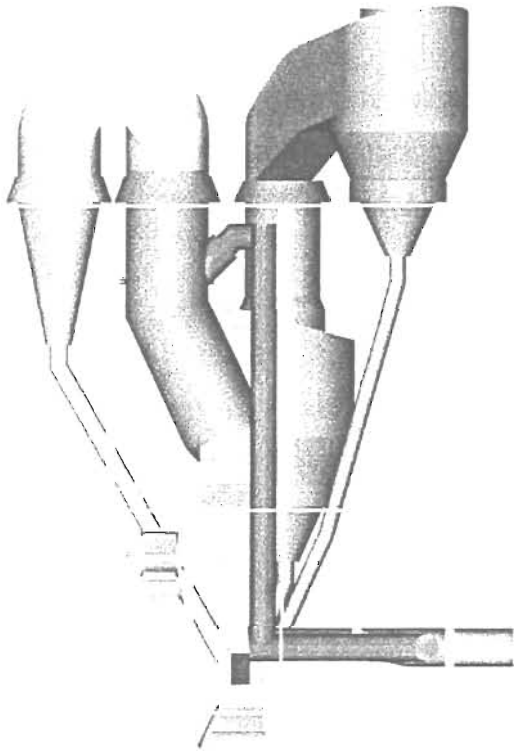
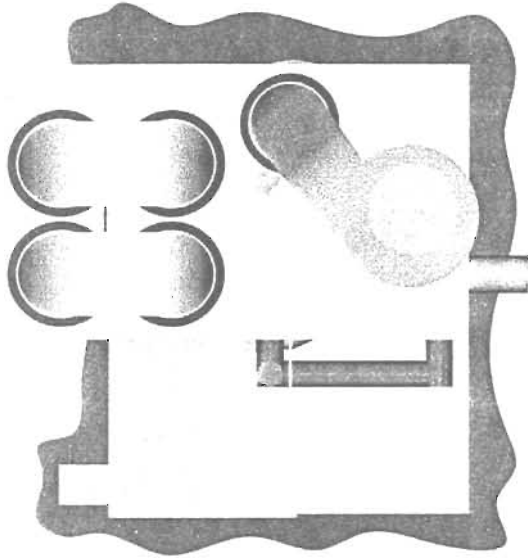
This minimizes the generation of new NO_x in the calciner, and further reduces the nitrogen oxides coming from the rotary kiln.

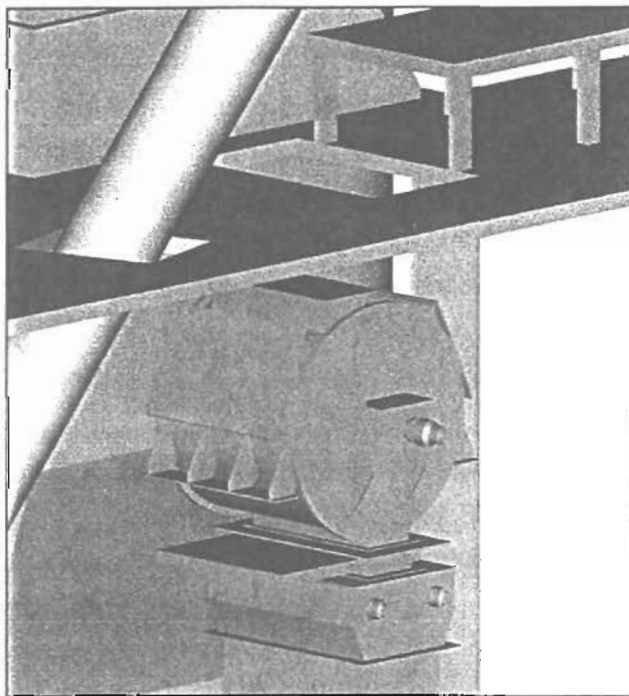
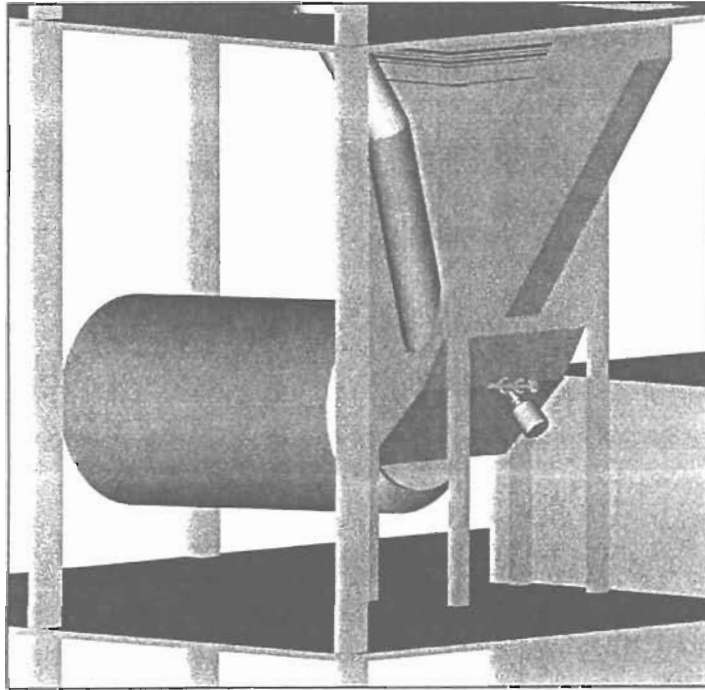
NO_x emissions from the present preheater configuration of the Thompson S. Baker Cement Plant have been measured to be 3.5 lbs/ton clinker. The proposed modifications are intended to reduce NO_x emissions sufficiently to meet the future permitted level of 2.8 lbs/ton clinker.

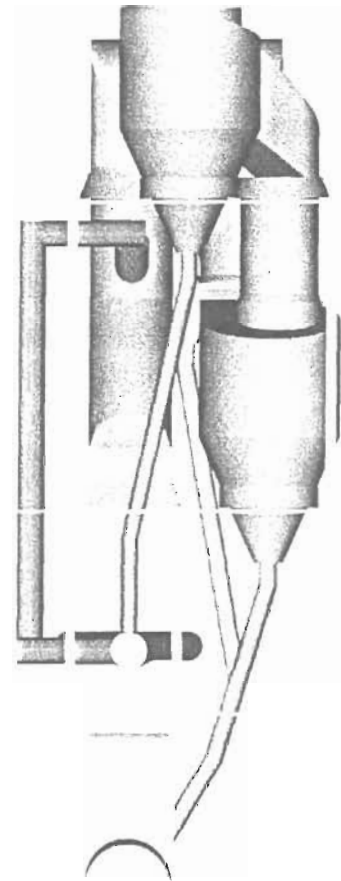
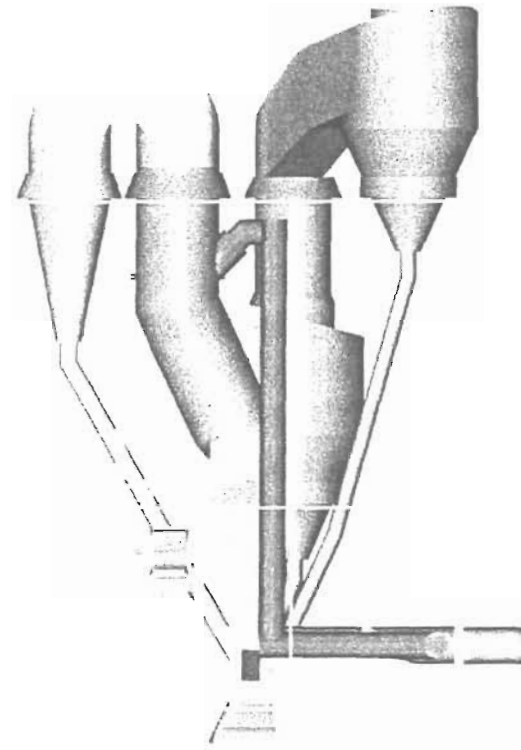
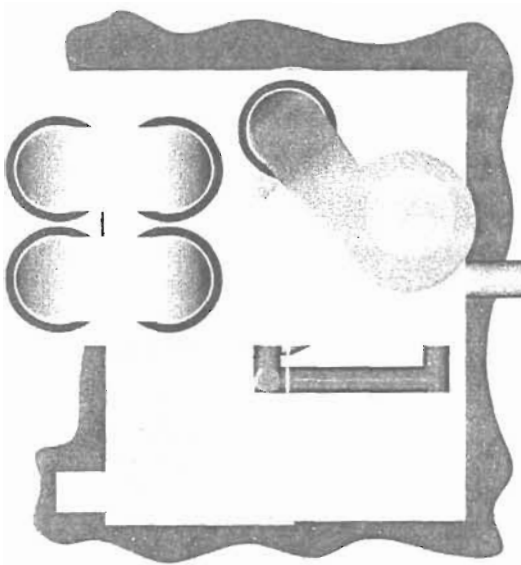












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TERRY COLE
SEGUNDO J. FERNANDEZ
SCOTT W. FOLTZ
KENNETH F. HOFFMAN
KENNETH G. OERTEL
PATRICIA A. RENOVITCH

November 17, 2000

Via Facsimile and U.S. Mail

Mr. Howard C. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Re: FDEP Air Construction Permit No. AC01-267311 / PSD-FL-²²⁸~~288~~
Facility No.: 0010087

Dear Mr. Rhodes:

We represent Florida Rock Industries, Inc. with respect to its Thompson S. Baker Cement Plant in Newberry, Florida. On July 17, 2000 we filed a request for extension of the above referenced permit. On October 23, 2000, FRI granted the Department an additional 30 days to review the request. The request is pending. We understand that the 90-day processing time clock, under Section 120.60 F.S. is about to run out, and that the Department needs additional time to process FRI's extension request.

We are pleased to grant the Department an additional 45 days in which to process FRI's request. This constitutes a waiver of the processing time clock and is given to facilitate resolution of all outstanding questions and issues. Please do not hesitate to call me if you have any questions.

Sincerely,



Segundo J. Fernandez
Timothy P. Atkinson

c: Kirby B. Green, III
John Baker Doug Beason
Fred Cohrs John B. Koogler
Cary Cohrs Al Linero

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PATRICIA A. RENOVTCH

October 27, 2000

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

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OCT 30 2000

BUREAU OF AIR REGULATION

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
Page 2

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

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OCT 25 2000

October 23, 2000

BUREAU OF AIR REGULATION

Via Facsimile and U.S. Mail

Mr. Howard C. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

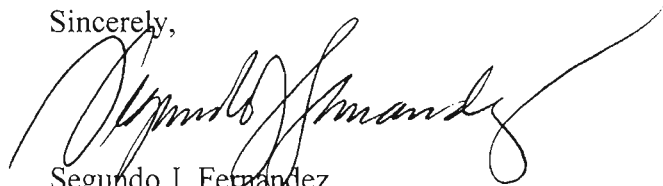
Re: FDEP Air Construction Permit No. AC01-267311 / PSD-FL-288
Facility No.: 0010087

Dear Mr. Rhodes:

We represent Florida Rock Industries, Inc. with respect to its Thompson S. Baker Cement Plant in Newberry, Florida. On July 17, 2000 we filed a request for extension of the above referenced permit. The request is pending. We understand that the 90-day processing time clock, under Section 120.60 F.S. is about to run out, and that the Department needs additional time to process FRI's extension request.

We are pleased to grant the Department an additional 30-days in which to process FRI's request. This constitutes a waiver of the processing time clock and is given to facilitate resolution of all outstanding questions and issues. Please do not hesitate to call me if you have any questions.

Sincerely,



Segundo J. Fernandez

Timothy P. Atkinson

- c: John Baker Doug Beason
- Fred Cohrs John B. Koogler
- Cary Cohrs Al Linero

10/18/2000 12:45

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D E P

PAGE 01



Department of Environmental Protection

Jeb Bush
Governor

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

David Struhs
Secretary

Via Facsimile

October 18, 2000

James J. Konish, President
Florida Professional License Watch, Inc.
P.O. Box 385
Gainesville, Florida 32602

Re: FPLW, Inc. v. Florida Rock Industries, Inc. and Department of Environmental Protection, OGC Case No. 99-1804

Dear Mr. Konish:

The purpose of this letter is two-fold. First and foremost, I would like to eliminate any confusion with respect to the question of whether the Department has fully complied with FPLW's public records request pursuant to Chapter 119, Florida Statutes. As you may recall, by correspondence dated May 2, 2000, FPLW requested the Department provide certain public records pertaining to the Florida Rock facility in Newberry, Florida.

By transmittal letter dated May 23, 2000, copies of the requested public records were provided by the Department's Northeast District Office. Mr. Kirts's letter implies that certain documents were not provided by the District based on a claim the documents pertained to a "matter under litigation." Despite this assertion, it is my understanding that the District Office has provided FPLW a copy any public record that was responsive to your request. In short, the Department has not withheld any public records and there are no public records which the Department asserts are exempt from the provisions of Chapter 119, Florida Statutes.

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D E P.

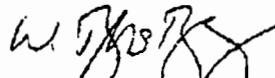
PAGE 02

The statement in Mr. Kirts's letter was the result of miscommunication between Mr. Kirts and the Office of General Counsel. It is my understanding that FPLW has recently filed a petition for writ of mandamus to compel the production of public records responsive to FPLW's letter dated May 2, 2000. To the extent FPLW is seeking a writ of mandamus to compel the production of public records, I would suggest the petition is moot because there is no legal need to compel that which has already been performed.

The second matter which I would like to address is Florida Rock's pending request for an extension of its Prevention of Significant Deterioration permit. On July 17, 2000, Florida Rock requested an extension of the PSD permit through January 31, 2001. On July 18, 2000, the Department requested that Florida Rock provide additional information with respect to the request for an extension of time. As of this date, the Department has not taken any proposed agency action with respect to Florida Rock's request.

Please feel free to contact my office should you have any questions.

Sincerely,



W. Douglas Beeson, Esq.

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SEP 05 2000

ACID MIST AND BERYLLIUM
EMISSION MEASUREMENTS

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT-JAX

KILN/RAW MILL

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FLORIDA ROCK INDUSTRIES
THOMPSON S. BAKER CEMENT PLANT
NEWBERRY, FLORIDA

SEP 11 2000

BUREAU OF AIR REGULATION

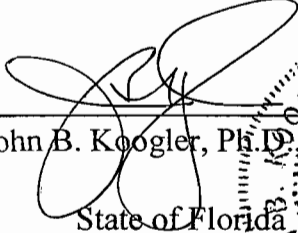
PERMIT NO. AC01-267311/PSD-FL-228

JULY 21 AND 24, 2000

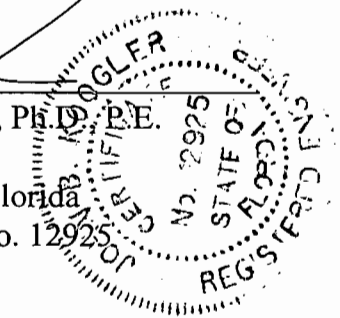
KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW 13TH STREET
GAINESVILLE, FLORIDA
352-377-5822



To the best of my knowledge, all applicable field and analytical procedures comply with the Florida Department of Environmental Protection requirements and all test data and plant operating data are true and correct.



John B. Koogler, Ph.D., P.E.
State of Florida
Registration No. 12925



9/15/00

Date

TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	SAMPLING POINT LOCATIONS	3
3.0	FIELD AND ANALYTICAL PROCEDURES	4
4.0	SUMMARY OF RESULTS	5

APPENDIX

1.0 INTRODUCTION

Florida Rock Industries owns and operates a 2300 ton per day (clinker) dry process precalciner Portland cement plant on CR 235, two miles north of the city center of Newberry, Florida. On July 21 and 24, 2000, Koogler & Associates Environmental Services of Gainesville, Florida, conducted sulfuric acid mist and beryllium emission measurements on the kiln/raw mill stack in accordance with EPA Test Method 8 (40 CFR 60, Appendix A) for acid mist and Test Method 104 (40 CFR 61, Appendix B) for beryllium. The purpose of the testing was to establish emission rates for these two air pollutants as required by Permit AC01-267311/PSD-FL-228.

The Northeast District Office of the Florida Department of Environmental Protection (FDEP) in Jacksonville, the FDEP Northeast District Branch Office in Gainesville and FDEP in Tallahassee, Florida, were notified of the scheduled initial air emission performance tests and testing protocol at the cement plant.

During the acid mist test period, the kiln was operating at a preheater feed rate of 139.8 tons per hour and during the beryllium test period, the kiln was operating at a preheater feed rate of 138.3 tons per hour; both within 10 percent of the permitted feed rate of 149.9 tons per hour. Permit AC01-267311 limits the preheater feed rate to 149.9 tons per hour, which approximately corresponds to a permitted clinker production rate of 95.8 tons per hour.

The permit for the plant limits acid mist and beryllium emissions from the kiln/raw mill to rates established by Best Available Control Technology and specifies that the emission limits for these air pollutants be established based on "future stack tests". The emission measurements reported herein represent the initial emission measurements on the plant for acid mist and beryllium.

The emissions from the kiln/raw mill are controlled by electrostatic precipitators (ESPs). The measured mass emission rate of acid mist from the kiln/raw mill averaged 0.0003 pounds per hour and beryllium emissions averaged 0.06 pounds per hour.

2.0 SAMPLING POINT LOCATIONS

Four sample ports are located in the 112-inch diameter, 241-foot high stack exhausting the kiln/raw mill. The ports are 50.6 feet (5.4 stack diameters) below the top of the stack and 146.8 feet (15.7 diameters) above the point where the kiln/raw mill gases enter the stack. Based on the requirements of EPA Method 1 (40 CFR 60, Appendix A), 12 sample points were selected; three points through each of the four ports.

3.0 FIELD AND ANALYTICAL PROCEDURES

Sulfuric acid mist emission measurements were conducted on the kiln/raw mill stack using EPA Method 8 and beryllium emission measurements were conducted using EPA Method 104. The sampling point locations for the two EPA methods were established in accordance with EPA Method 1. Stack gas velocity measurements and stack gas moisture measurements were made in conjunction with the EPA Method 8 and 104 tests in accordance with EPA Methods 2 and 4. Measurements to determine the dry molecular weight of the stack gas were made in accordance with EPA Method 3. All EPA tests methods are described in 40 CFR 60, Appendix A or 40 CFR 61, Appendix B and have been adopted by reference by FDEP by Rule 62-297.401, F.A.C. There were no variations or exceptions to any of the referenced test methods.

4.0 SUMMARY OF RESULTS

The sulfuric acid mist emission measurements made on July 21, 2000, are summarized in Table 1. The acid mist emission rate from the kiln/raw mill ranged from non-detectable to 0.0009 pounds per hour and averaged 0.0003 pounds per hour. The stack gas flow rate from the kiln/raw mill averaged 127,703 standard cubic feet per minute, dry (193,072 acfm). The stack gas temperature averaged 219°F and the moisture content averaged 14.9 percent.

The beryllium emission rate from the kiln/raw mill, measured on July 24, 2000, ranged from 0.01 to 0.12 pounds per hour and averaged 0.06 pounds per hour. These data are summarized in Table 2. The stack gas flow rate from the kiln/raw mill during the beryllium tests averaged 106,903 dry standard cubic feet per minute (165,420 acfm), the stack gas temperature averaged 231°F and the stack gas moisture averaged 16.3 percent.

These emission measurements represent the initial acid mist and beryllium emission measurements on the kiln/raw mill required by Permit AC01-267311. These data will be used by FDEP to establish emission limits for acid mist and beryllium for the kiln/raw mill.

Calculations, field and analytical data sheets, plant operating information, equipment calibration sheets and a list of project participants are included in the Appendix of this report.

TABLE 1
SULFURIC ACID MIST EMISSION TEST DATA

FLORIDA ROCK INDUSTRIES, INC
NEWBERRY, FLORIDA

SOURCE: Kiln/Raw Mill Stack

DATE: July 21, 2000

Run No.	Stack Flow Rate (SCFMD)	ACID MIST			
		Conc. (lbs/DSCF)	Emission Rate (Lbs/Hr)	Conc. (mg/DSCF)	Conc. (mg/ACF)
1	124,881	0.00E+00	0.000	0.0000	0.0000
2	126,717	2.88E-09	0.022	0.0013	0.0009
3	131,511	0.00E+00	0.000	0.0000	0.0000
Avg.	127,703	9.59E-10	0.007	0.0004	0.0003

TABLE 2
BERYLLIUM EMISSION TEST DATA

FLORIDA ROCK INDUSTRIES, INC.
NEWBERRY, FLORIDA

SOURCE: Kiln/Raw Mill Stack

DATE: July 24, 2000

Run No.	Process Weight Rate (Tons/hr)	Stack Gas Flow Rate (SCFMD)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Total Beryllium	
					Conc. (gr/dscf)	Emission Rate (Lbs/Hr)
1	135.0	93,275	246	17.0	0.0001	0.06
2	140.0	98,112	248	16.0	0.0001	0.12
3	140.0	129,320	200	16.0	0.0000	0.01
Average	138.3	106,903	231	16.3	0.0001	0.06

$$\frac{35.31 \text{ ft}^3}{\text{m}^3}$$

$$1 \mu\text{g} = 1.54 (10)^{-5} \text{ grain}$$

$$\frac{0.0001 \text{ gr} \times \frac{1 \text{ lb}}{1.54(10)^5 \text{ gr}}}{\text{dscf}} = \frac{6.49 \mu\text{g}}{\text{dscf}}$$

$$\frac{6.49 \mu\text{g}/\text{ft}^3}{1.3 \text{ m}^3/35.31 \text{ ft}^3} = \underline{\underline{229.3 \mu\text{g}/\text{m}^3}}$$

APPENDIX

ACID MIST TESTS

CALCULATIONS

SUMMARY OF ACID MIST EMISSION TEST DATA

Florida Rock Industries
 Cement Kiln
 July 21, 2000

Run No.	Stack Flow Rate (SCFMD)	ACID MIST			
		Conc. (lbs/DSCF)	Emission Rate (Lbs/Hr)	Conc. (mg/DSCF)	Conc. (mg/ACF)
1	124,881	0.00E+00	0.000	0.0000	0.0000
2	126,717	2.88E-09	0.022	0.0013	0.0009
3	131,511	0.00E+00	0.000	0.0000	0.0000
Avg.	127,703	9.59E-10	0.007	0.0004	0.0003

SUMMARY OF SO2 EMISSION TEST DATA

Florida Rock Industries
 Cement Kiln
 July 21, 2000

Run No.	Stack Flow Rate (SCFMD)	Conc. (ppm)	SO2		Emission Rate (lb/hr)	Emission Rate (lb/MMBtu)
			Conc. at 0% CO2 (ppm)	Conc. at 0% O2 (ppm)		
1	124,881	0.49			0.61	
2	126,717	0.68			0.86	
3	131,511	0.66			0.87	
Avg.	127,703	0.61			0.78	

GENERAL DATA

DATA FILE NAME: H2SO4

 Company : Florida Rock Industries *****
 Source/Unit : Cement Kiln 12:18 PM
 Date : July 21, 2000 Cp : 0.840
 Stack dia. : 112.00 inch OR : Duct Length : 0.00 inch
 Oxygen Corr.: 0.0 percent Duct Width : 0.00 inch
 CO2 Corr. : 0.0 percent Std. Temp. : 68 F

FUEL ANALYSIS DATA, (By F Factor or Fuel Use)

F Factor = F, Fuel Use = U F Process Wt.

 Hydrogen, wt% : 0.00 Run 1 : 135.5 Tons/hr
 Carbon, wt% : 0.00 Run 2 : 144
 Sulfur, wt% : 0.00 Run 3 : 140
 Nitrogen, wt% : 0.00
 Oxygen, wt% : 0.00
 Btu/lb : 0

Type of Flow Meter : (1=Meter Box 2=Mass Flow Meter) 1

F-Factor : dscf/MMBtu;

FIELD DATA ----- METHOD 5 RUN RUN RUN
 ----- 1 2 3

Meter Temp., Tm (F)	101	102	101
Stack Temp., Ts (F)	221	219	219
Sq.Rt. dP	0.73	0.74	0.76
dH (in. H2O)	2.44	1.72	1.85
Meter Vol., Vm (ft3)	56.484	48.731	49.946
Meter Y	0.997	0.997	0.997
Bar. Press., Pb (in.Hg.)	29.90	29.90	29.90
Vol. H2O, Vlc (ml)	197	168	172
Static Press., Ps (in.H2O)	-0.25	-0.25	-0.25
Test Time (min.)	60.0	60.0	60.0
Nozzle Dia., Dn (in.)	0.308	0.278	0.278
Oxygen, O2 (%)	9.7	11.7	11.4
Carbon Dioxide, CO2 (%)	17.6	17.1	16.8
Carbon Monoxide, CO (%)	0.0	0.0	0.0
Report Emission Criteria in ? 1 = lb/hr g = gr/dscf :			L
Process Rate Units ? T = Ton/hr, L = Lbs/hr, C = Cans/min:			T
Allowable Particulate Matter Emission Rate			

LABORATORY RESULTS RUN RUN RUN
 ----- 1 2 3

GRAVIMETRIC ANALYSIS METHOD 5 :

Front Half Wash (FHW)	0.00000	0.00000	0.00000	grams
Filterable Sample (MF)	0.00000	0.00000	0.00000	
Condensable Sample (BHW)	0.00000	0.00000	0.00000	

----- M E T H O D S 6, 8, & 26 -----
 IS FIELD DATA THE SAME AS METHOD 5? (Y=YES, N=NO) Y
 Type of Flow Meter : (1=Meter Box 2=Mass Flow Meter) 1

FIELD DATA	RUN	RUN	RUN
-----	1	2	3
Meter Temp., Tm (F)	101	102	101
dH (in. H2O)	2.44	1.72	1.85
Meter Vol., Vm (ft3)	56.484	48.731	49.946
Meter Y	0.997	0.997	0.997
Bar. Press., Pb (in.Hg.)	29.90	29.90	29.90
O2 Correction (%)	0.0 %		
CO2 Correction (%)	0.0 %		

SO2 ANALYSIS METHOD 6 OR 8 :

Sample Volume, ml	1000	1000	1000
Sample Aliquot, ml	20	20	20
Volume of Titer, ml	0.33	0.35	0.35
Volume of Titer Blank, ml	0.20	0.20	0.20
	Normality of BaCl0.0097500		

LABORATORY RESULTS (Continued)

ACID MIST ANALYSIS METHOD 8 :

Sample Volume, ml	500	500	500
Sample Aliquot, ml	100	100	100
Volume of Titer, ml	0.20	0.23	0.20
Volume of Titer Blank, ml	0.20	0.20	0.20
	Normality of BaCl0.0097500		

HYDROGEN CHLOIDE (HCl) ANALYSIS METHOD 26 :

Chloride Volume, mg	0.0000	0.0000	0.0000
Hydrogen Chloride (HCl) Volume, mg	0.0000	0.0000	0.0000

A. FIELD DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln
 DATE : July 21, 2000

	RUN 1	RUN 2	RUN 3
Vlc = Vol water collected in train, ml	197.0	168.0	172.0
Vm = Sample gas vol, meter cond., acf	56.484	48.731	49.946
Y = Meter calibration factor	0.9970	0.9970	0.9970
Pbar = Barometric pressure, in. Hg	29.90	29.90	29.90
Pstatic = Stack static pressure, in. H2O	-0.25	-0.25	-0.25
dH = Avg meter pressure diff, in. H2O	2.44	1.72	1.85
Tm = Absolute meter temp., degrees R	561.0	562.3	561.3
Vm(std) = Sample gas vol, Std. cond., dscf	53.285	45.788	47.028
Bws = Water vapor in gas stream, fraction	0.148	0.147	0.147
MF = Moisture factor (1 - Bws)	0.852	0.853	0.853
CO2 = Carbon Dioxide, dry, volume %	17.60	17.10	16.80
O2 = Oxygen, dry, volume %	9.70	11.70	11.40
N2 = Nitrogen, dry volume %	72.70	71.20	71.80
Md = Molecular weight of stack gas, dry	31.20	31.20	31.14
Ms = Molecular weight of stack gas, wet	29.25	29.26	29.21
Cp = Pitot tube coefficient	0.84	0.84	0.84
Sq.Rt. dP = Avg. square root of each dP	0.7278	0.7367	0.7632
Ts = Absolute stack temp., degrees R	681.3	679.3	678.5
A = Area of stack, ft2	68.42	68.42	68.42
Qstd = Volumetric flowrate, dscfm	124,881	126,717	131,511
An = Nozzle area, ft2	5.17E-04	4.22E-04	4.22E-04
0 = Sample time, minutes	60.00	60.00	60.00
%I = Isokinetic variation, percent	94.04	97.76	96.75

SOURCE TEST CALCULATIONS

PLANT : Florida Rock Industries
Cement Kiln

RUN NO.: 1
DATE : July 21, 2000

STD.TEMP, Tstd = 68 F	STATIC PRESS., Ps = -0.25 in. H2O
METER TEMP, Tm = 101 F	PITOT COFF., Cp = 0.840
STACK TEMP, Ts = 221.3 F	STACK I.D. = 112.00 inch
AVG.VEL.HEAD,dP = 0.530 in. H2O	DUCT LENGTH = inch
METER ORIFICE,dH= 2.44 in. H2O	DUCT WIDTH = inch
METER VOL., Vm = 56.484 Cu.Ft.	STACK AREA, As = 68.417 Sq.Ft.
METER COFF., Y = 0.997	TEST TIME = 60.00 min.
BAR. PRESS., Pb = 29.90 in.Hg	NOZZLE DIA. = 0.308 inch
COND.(Vlc) = 197.0 ml	NOZZLE DIA., An = 5.2E-04 Sq.Ft.

GAS ANALYSIS = 9.70 % O2	0.00 % CO
17.60 % CO2	72.70 % N2

$Vm(std) = [(T(std) + 460) / 29.92] \times Vm \times Y \times (Pb + (dH / 13.6)) / (Tm + 460) \dots\dots$	=	53.285	dscf
$Vw(std) = (8.9148 \times 10e-5) \times (Tstd + 460) \times Vlc$	=	9.273	scf
$Bws = Vw(std) / (Vm(std) + Vw(std)) \dots\dots\dots$	=	0.148	Lower Bws value used.
$Bws @ \text{Saturated Conditions} = \text{Vapor Press. of H2O @ Dew Point Temp.} / (Ps, \text{ in.Hg.}) \dots\dots\dots$	=	1.000	
$\%EA = (\%O2 - 0.5\%CO) / (0.264\%N2 - (\%O2 - 0.5\%CO)) \times 100$	=	102.18	
$Md = (.44 \times \%CO2) + (.32 \times \%O2) + [.28 \times (\%N2 + \%CO)]$	=	31.20	
$Ms = (Md \times (1-Bws)) + (18.0 \times Bws) \dots\dots\dots$	=	29.25	
$P(stack) = Pbar + (Ps / 13.6) \dots\dots\dots$	=	29.88	in. Hg
$vs = 85.49 \times CP \times (Sq.Rt.dP) \times [Sq.Rt.(Ts + 460) / (Ms \times P(stack))] \dots\dots\dots$	=	46.15	ft/sec
$Qs = vs \times As \times 60 \dots\dots\dots$	=	189,433	acf/min
$Qs(std) = Qs \times (1-Bws) \times ((Tstd + 460) / (Ts + 460)) \times (P(stack) / 29.92) \dots\dots\dots$	=	124,881	dscf/min
$I = (Ts+460) \times [(0.002669 \times Vlc) + (Vm(std) / (T(std) + 460) / 29.92] \times 100 / [\text{Time} \times P(stack) \times An \times vs \times 60] \dots\dots\dots$	=	94.04	%

SOURCE TEST CALCULATIONS

PLANT : Florida Rock Industries
Cement Kiln

RUN NO.: 2
DATE : July 21, 2000

STD.TEMP, Tstd = 68 F	STATIC PRESS., Ps = -0.25 in. H2O
METER TEMP, Tm = 102.25 F	PITOT COFF., Cp = 0.840
STACK TEMP, Ts = 219.3 F	STACK I.D. = 112.00 inch
AVG.VEL.HEAD, dP = 0.543 in. H2O	DUCT LENGTH = inch
METER ORIFICE, dH = 1.72 in. H2O	DUCT WIDTH = inch
METER VOL., Vm = 48.731 Cu.Ft.	STACK AREA, As = 68.417 Sq.Ft.
METER COFF., Y = 0.997	TEST TIME = 60.00 min.
BAR. PRESS., Pb = 29.90 in.Hg	NOZZLE DIA. = 0.278 inch
COND.(Vlc) = 168.0 ml	NOZZLE DIA., An = 4.2E-04 Sq.Ft.

GAS ANALYSIS = 11.70 % O2	0.00 % CO
17.10 % CO2	71.20 % N2

$Vm(std) = [T(std) + 460 / 29.92] \times Vm \times Y \times (Pb + (dH / 13.6)) / (Tm + 460) \dots\dots$	=	45.788	dscf
$Vw(std) = (8.9148 \times 10e-5) \times (Tstd + 460) \times Vlc$	=	7.908	scf
$Bws = Vw(std) / (Vm(std) + Vw(std)) \dots\dots\dots$	=	0.147	Lower Bws value used.
$Bws @ \text{Saturated Conditions} = \text{Vapor Press. of H2O @ Dew Point Temp.} / (Ps, \text{in.Hg.}) \dots\dots\dots$	=	1.000	
$\%EA = (\%O2 - 0.5\%CO) / (0.264\%N2 - (\%O2 - 0.5\%CO)) \times 100$	=	164.86	
$Md = (.44 \times \%CO2) + (.32 \times \%O2) + [.28 \times (\%N2 + \%CO)]$	=	31.20	
$Ms = (Md \times (1 - Bws)) + (18.0 \times Bws) \dots\dots\dots$	=	29.26	
$P(stack) = Pbar + (Ps / 13.6) \dots\dots\dots$	=	29.88	in. Hg
$vs = 85.49 \times CP \times (Sq.Rt.dP) \times [Sq.Rt.(Ts + 460) / (Ms \times P(stack))] \dots\dots\dots$	=	46.64	ft/sec
$Qs = vs \times As \times 60 \dots\dots\dots$	=	191,439	acf/min
$Qs(std) = Qs \times (1 - Bws) \times ((Tstd + 460) / (Ts + 460)) \times (P(stack) / 29.92) \dots\dots\dots$	=	126,717	dscf/min
$I = (Ts + 460) \times [(0.002669 \times Vlc) + (Vm(std) / (T(std) + 460) / 29.92)] \times 100 / [Time \times P(stack) \times An \times vs \times 60] \dots\dots\dots$	=	97.76	%

SOURCE TEST CALCULATIONS

PLANT : Florida Rock Industries
Cement Kiln

RUN NO.: 3
DATE : July 21, 2000

STD.TEMP, Tstd = 68 F	STATIC PRESS., Ps = -0.25 in. H2O
METER TEMP, Tm = 101.25 F	PITOT COFF., Cp = 0.840
STACK TEMP, Ts = 218.5 F	STACK I.D. = 112.00 inch
AVG.VEL.HEAD,dP = 0.582 in. H2O	DUCT LENGTH = inch
METER ORIFICE,dH= 1.85 in. H2O	DUCT WIDTH = inch
METER VOL., Vm = 49.946 Cu.Ft.	STACK AREA, As = 68.417 Sq.Ft.
METER COFF., Y = 0.997	TEST TIME = 60.00 min.
BAR. PRESS., Pb = 29.90 in.Hg	NOZZLE DIA. = 0.278 inch
COND.(Vlc) = 172.0 ml	NOZZLE DIA., An = 4.2E-04 Sq.Ft.

GAS ANALYSIS = 11.40 % O2	0.00 % CO
16.80 % CO2	71.80 % N2

$Vm(std) = [T(std) + 460 / 29.92] \times Vm \times Y \times (Pb + (dH / 13.6)) / (Tm + 460) \dots$	=	47.028	dscf
$Vw(std) = (8.9148 \times 10e-5) \times (Tstd + 460) \times Vlc$	=	8.096	scf
$Bws = Vw(std) / (Vm(std) + Vw(std)) \dots$	=	0.147	Lower Bws value used.
$Bws @ \text{Saturated Conditions} = \text{Vapor Press. of H2O @ Dew Point Temp.} / (Ps, \text{in.Hg.}) \dots$	=	1.000	
$\%EA = (\%O2 - 0.5\%CO) / (0.264\%N2 - (\%O2 - 0.5\%CO)) \times 100$	=	150.89	
$Md = (.44 \times \%CO2) + (.32 \times \%O2) + [.28 \times (\%N2 + \%CO)]$	=	31.14	
$Ms = (Md \times (1 - Bws)) + (18.0 \times Bws) \dots$	=	29.21	
$P(stack) = Pbar + (Ps / 13.6) \dots$	=	29.88	in. Hg
$vs = 85.49 \times CP \times (Sq.Rt.dP) \times [Sq.Rt.(Ts + 460) / (Ms \times P(stack))] \dots$	=	48.32	ft/sec
$Qs = vs \times As \times 60 \dots$	=	198,344	acf/min
$Qs(std) = Qs \times (1 - Bws) \times ((Tstd + 460) / (Ts + 460)) \times (P(stack) / 29.92) \dots$	=	131,511	dscf/min
$I = (Ts + 460) \times [(0.002669 \times Vlc) + (Vm(std) / (T(std) + 460) / 29.92)] \times 100 / [Time \times P(stack) \times An \times vs \times 60] \dots$	=	96.75	%

B. PARTICULATE DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln
 DATE : July 21, 2000

	RUN 1	RUN 2	RUN 3
Sample Weight (FHW + MF + BHW), mg	0.00	0.00	0.00
Meter Volume, standard cond., Vm(std)	53.285	45.788	47.028
Carbon Dioxide, percent	17.60	17.10	16.80
Oxygen, percent	9.70	11.70	11.40
Sample Concentration :			
gr/scf	0.0000	0.0000	0.0000
gr/dscf	0.0000	0.0000	0.0000
gr/dscf @ 0 % CO2	0.0000	0.0000	0.0000
gr/dscf @ 0 % O2	0.0000	0.0000	0.0000
ppm * MW (dry gas).....	0.0	0.0	0.0
ppm * MW @ 0% CO2	0.0	0.0	0.0
ppm * MW @ 0% O2	0.0	0.0	0.0

C. ACID MIST DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln
 DATE : July 21, 2000

Normality of BaCl2 : 0.0097500

FILTERABLE ACID MIST :

Sample Volume, ml	500	500	500
Sample Aliquot, ml	100	100	100
Volume of Titer, ml	0.20	0.23	0.20
Volume of Titer Blank, ml	0.20	0.20	0.20
Volume of Acid Mist Meter (dscf)	53.285	45.788	47.028
$Vm(std) = [(T(std) + 460) / 29.92]$ $x Vm(SO2) x Y(SO2) x (Pb + (dH / 13.6))$ $/ (Tm + 460)$			
Qs = Volumetric flowrate, acfm	189,433	191,439	198,344
Qstd = Volumetric flowrate, dscfm	124,881	126,717	131,511
Total lb Acid Mist	0.00E+00	1.32E-07	0.00E+00
$[1.0811E-4 x (Vt - Vtb) x N x Vsol]$ $/ Vol(aloq)$			
Total Acid Mist lb/hr	0.00	0.02	0.00
$[Acid Mist (lb) / Vm std (ft^3)]$ $x Qs std x 60$			
Acid Mist (lb/MMBtu)			
$[Acid Mist (lb) / Vm std (ft^3)] x F-Factor$			
Acid Mist Concentration lb/dscf	0.00E+00	2.88E-09	0.00E+00
$[Acid Mist Concentration (lb) / Vm std (ft^3)]$			
Acid Mist Concentration mg/dscf	0.0000	0.0013	0.0000
$[Acid Mist Concentration lb/ft^3 * 453,600 mg/lb]$			
Acid Mist Concentration mg/acf	0.0000	0.0009	0.0000
$[Acid Mist Concentration mg/ft^3 * Qs(std) / Qs]$			

D. SULFUR DIOXIDE DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln
 DATE : July 21, 2000

Normality of BaCl2 0.0097500

SO2 ANALYSIS :

Sample Volume, ml	1000	1000	1000
Sample Aliquot, ml	20	20	20
Volume of Titer, ml	0.33	0.35	0.35
Volume of Titer Blank, ml	0.20	0.20	0.20

Volume of SO2 Meter	53.285	45.788	47.028
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$$Vm(std) = [(T(std) + 460) / 29.92]$$

$$x Vm(SO2) x Y(SO2) x (Pb + (dH / 13.6))$$

$$/ (Tm + 460)$$

Qstd = Volumetric flowrate, dscfm	124,881	126,717	131,511
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Total lb SO2	4.30E-06	5.16E-06	5.16E-06
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$$[7.061E-5 x (Vt - Vtb) x N x Vsol]$$

$$/ Vol(aloq)$$

Total SO2 lb/hr	0.61	0.86	0.87
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$$[SO2 (lb) / Vm std (ft^3)]$$

$$x Qs std (ft^3/min) x 60 (min/hr)$$

SO2 (lb/MMBtu)

$$[SO2 (lb) / Vm std (ft^3)] x F (dscf/MMBtu)$$

SO2 (ppm)	0.49	0.68	0.66
-----------------	------	------	------

$$[Mass SO2 (lb) x 385 / 64E+6 (ft^3/lb)] / Vm(std)$$

SO2 (ppm) @ 0.0 % CO2 Corr.

$$ppm x 0.0 \% Corr. / \% CO2 in Stack$$

SO2 (ppm) 0.0% O2 Corr.

$$ppm x (20.9\% - 0.0\% O2 Corr.)$$

$$/(20.9\% - \% O2 Stack)$$

Heat Input (MMBtu/hr)

$$(Process Weight (ton/hr) x Heating Value$$

$$(Btu/gal) x Fuel Use Rate (gal/ton) / 1E6$$

SO2 (lb/MMBtu)

$$SO2 (lb/hr) / Heat Input (MMBtu/hr)$$

EMISSION RATE CALCULATIONS

PLANT :Florida Rock Industries
Cement Kiln

RUN NO.: 1
DATE : July 21, 2000

STANDARD TEMP. : 68 F

Front Half Wash (FHW)	0.00000 grams	Vm(std)	53.285	ft3	
Mass Filter (MF)	0.00000 grams	Vw(std)	9.273	ft3	
Back Half Wash (BHW)	0.00000 grams	Qs(std)	124,881	dscfm	
Vm(std) SO2	53.285 dscf	Bws	0.148		
CO2 CORR	0.0 %	CO2	17.60	%	
O2 CORR.	0.0 %	O2	9.70	%	

F-FACTOR

10E6 x [3.64(%H) + 1.53(%C) + 0.57(%S) + 0.14(%N) - 0.46(%O2)] / (Btu/lb) x [(Tstd + 460)/528] dscf/MMBtu
FUEL USE

Use Rate (gal/ton) * Process Wt. (ton/hr) gal/hr
Heat Input = (Process Weight (ton/hr) x Heating MMBtu/hr
Value (Btu/gal) x Fuel Use Rate (gal/ton) / 1E6
TOTAL PARTICULATE

15.432 x (FHW + MF + BHW) / [(Vm(std) + Vw(std)] ... 0.0000 gr/scf
15.432 x (FHW + MF + BHW) / (Vm(std) 0.0000 gr/dscf
gr/dscf x (12 / %CO2) 0.0000 @ 0% CO2
gr/dscf x [(20.9 - Oxygen corr.) / (20.9 - %O2)] ... 0.0000 @ 0% O2
0.00857 x Qs(std) x gr/dscf 0.00 lb/hr
F-Fac x 1.4286E-4 x [20.9 / (20.9-%O2)] x gr/dscf .. lb/MMBtu
Particulate (lb/hr) / Heat Input (MMBtu/hr) lb/MMBtu
TOTAL ACID MIST

[1.0811E-4 x (Vt - Vtb) x N x Vsol] / Vol(alog) 0.00E+00 lb Acid Mist
[Acid Mist (lb) / Vm std (ft^3)] x Qs std x 60 ... 0.00 lb/hr
[Acid Mist (lb) / Vm std (ft^3)] x F-Factor lb/MMBtu
SULFUR DIOXIDE (SO2)

[7.061E-5 x (Vt - Vtb) x N x Vsol] / Vol(alog) 4.30E-06 lb SO2
[SO2 (lb) / Vm std (ft^3)] x Qs std (ft^3/min) x 60 0.61 lb/hr
[SO2 (lb) / Vm std (ft^3)] x F lb/MMBtu
[Mass SO2 (lb) x 385 / 64E+6 (ft^3/lb)] / Vm (std) 0.49 ppm
ppm x 0.0 % Corr. / 17.6 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 9.7% O2 Stack) ppm @ 0% O2
SO2 (lb/hr / Heat Input) lb/MMBtu

HYDROGEN CHLORIDE DATA SUMMARY

[Mass HCl(mg) x 385 x 1E6] / [453600 x 36.5 x Vm(std) ppm
ppm x 0.0 % Corr. / 17.6 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 17.6% O2 Stack) ppm @ 0% O2
[Mass HCl(mg) x 60 x Qs / (Vm(std) x 453,600)]... lb/hr

EMISSION RATE CALCULATIONS

PLANT :Florida Rock Industries
Cement Kiln

RUN NO.: 2

STANDARD TEMP. : 68 F DATE : July 21, 2000

 Front Half Wash (FHW) 0.00000 grams Vm(std) 45.788 ft3
 Mass Filter (MF) 0.00000 grams Vw(std) 7.908 ft3
 Back Half Wash (BHW) 0.00000 grams Qs(std) 126,717 dscfm
 Vm(std) SO2 45.788 dscf Bws 0.147
 CO2 CORR 0.0 % CO2 17.10 %
 O2 CORR. 0.0 % O2 11.70 %

F-FACTOR

 $10E6 \times [3.64(\%H) + 1.53(\%C) + 0.57(\%S) + 0.14(\%N) - 0.46(\%O2)] / (Btu/lb) \times [(Tstd + 460)/528] \dots\dots\dots$ dscf/MMBtu
 FUEL USE

 Use Rate (gal/ton) * Process Wt. (ton/hr) gal/hr
 Heat Input = (Process Weight (ton/hr) x Heating MMBtu/hr
 Value (Btu/gal) x Fuel Use Rate (gal/ton) / 1E6
 TOTAL PARTICULATE

 $15.432 \times (FHW + MF + BHW) / [(Vm(std) + Vw(std))] \dots$ 0.0000 gr/scf
 $15.432 \times (FHW + MF + BHW) / (Vm(std)) \dots\dots\dots$ 0.0000 gr/dscf
 gr/dscf x (12 / %CO2) 0.0000 @ 0% CO2
 gr/dscf x [(20.9 - Oxygen corr.) / (20.9 - %O2)] ... 0.0000 @ 0% O2
 $0.00857 \times Qs(std) \times gr/dscf \dots\dots\dots$ 0.00 lb/hr
 $F-Fac \times 1.4286E-4 \times [20.9 / (20.9-\%O2)] \times gr/dscf \dots$ lb/MMBtu
 Particulate (lb/hr) / Heat Input (MMBtu/hr) lb/MMBtu
 TOTAL ACID MIST

 $[1.0811E-4 \times (Vt - Vtb) \times N \times Vsol] / Vol(aloq) \dots$ 1.32E-07 lb Acid Mist
 $[Acid Mist (lb) / Vm std (ft^3)] \times Qs std \times 60 \dots$ 0.02 lb/hr
 $[Acid Mist (lb) / Vm std (ft^3)] \times F-Factor \dots\dots\dots$ lb/MMBtu
 SULFUR DIOXIDE (SO2)

 $[7.061E-5 \times (Vt - Vtb) \times N \times Vsol] / Vol(aloq) \dots$.5.16E-06 lb SO2
 $[SO2 (lb) / Vm std (ft^3)] \times Qs std (ft^3/min) \times 60 \dots$ 0.86 lb/hr
 $[SO2 (lb) / Vm std (ft^3)] \times F \dots\dots\dots$ lb/MMBtu
 $[Mass SO2 (lb) \times 385 / 64E+6 (ft^3/lb)] / Vm (std) \dots$ 0.68 ppm
 ppm x 0.0 % Corr. / 17.6 % CO2 in Stack ppm @ 0% CO2
 ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 17.6% O2 Stack ... ppm @ 0% O2
 SO2 (lb/hr / Heat Input) lb/MMBtu

HYDROGEN CHLORIDE DATA SUMMARY

 $[Mass HCl(mg) \times 385 \times 1E6] / [453600 \times 36.5 \times Vm(std) \dots$ ppm
 ppm x 0.0 % Corr. / 17.1 % CO2 in Stack ppm @ 0% CO2
 ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 17.1% O2 Stack ... ppm @ 0% O2
 $[Mass HCl(mg) \times 60 \times Qs / (Vm(std) \times 453,600)] \dots$ lb/hr

EMISSION RATE CALCULATIONS

PLANT :Florida Rock Industries
Cement Kiln

RUN NO.: 3

DATE : July 21, 2000

STANDARD TEMP. : 68 F

Front Half Wash (FHW)	0.00000 grams	Vm(std)	47.028 ft3
Mass Filter (MF)	0.00000 grams	Vw(std)	8.096 ft3
Back Half Wash (BHW)	0.00000 grams	Qs(std)	131,511 dscfm
Vm(std) SO2	47.028 dscf	Bws	0.147
CO2 CORR	0.0 %	CO2	16.80 %
O2 CORR.	0.0 %	O2	11.40 %

F-FACTOR

10E6 x [3.64(%H) + 1.53(%C) + 0.57(%S) + 0.14(%N) - 0.46(%O2)] / (Btu/lb) x [(Tstd + 460)/528] dscf/MMBtu
FUEL USE

Use Rate (gal/ton) * Process Wt. (ton/hr) gal/hr
Heat Input = (Process Weight (ton/hr) x Heating MMBtu/hr
Value (Btu/gal) x Fuel Use Rate (gal/ton) / 1E6
TOTAL PARTICULATE

15.432 x (FHW + MF + BHW) / [(Vm(std) + Vw(std)] ... 0.0000 gr/scf
15.432 x (FHW + MF + BHW) / (Vm(std) 0.0000 gr/dscf
gr/dscf x (12 / %CO2) 0.0000 @ 0% CO2
gr/dscf x [(20.9 - Oxygen corr.) / (20.9 - %O2)] ... 0.0000 @ 0% O2
0.00857 x Qs(std) x gr/dscf 0.00 lb/hr
F-Fac x 1.4286E-4 x [20.9 / (20.9-%O2)] x gr/dscf .. lb/MMBtu
Particulate (lb/hr) / Heat Input (MMBtu/hr) lb/MMBtu
TOTAL ACID MIST

[1.0811E-4 x (Vt - Vtb) x N x Vsol] / Vol(alog) 0.00E+00 lb Acid Mist
[Acid Mist (lb) / Vm std (ft^3)] x Qs std x 60 ... 0.00 lb/hr
[Acid Mist (lb) / Vm std (ft^3)] x F-Factor lb/MMBtu
SULFUR DIOXIDE (SO2)

[7.061E-5 x (Vt - Vtb) x N x Vsol] / Vol(alog) .5.16E-06 lb SO2
[SO2 (lb) / Vm std (ft^3)] x Qs std (ft^3/min) x 60 0.87 lb/hr
[SO2 (lb) / Vm std (ft^3)] x F lb/MMBtu
[Mass SO2 (lb) x 385 / 64E+6 (ft^3/lb)] / Vm (std) 0.66 ppm
ppm x 0.0 % Corr. / 17.6 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 17.6% O2 Stack ppm @ 0% O2
SO2 (lb/hr / Heat Input) lb/MMBtu

HYDROGEN CHLORIDE DATA SUMMARY

[Mass HCl(mg) x 385 x 1E6] / [453600 x 36.5 x Vm(std) ppm
ppm x 0.0 % Corr. / 16.8 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 16.8% O2 Stack ppm @ 0% O2
[Mass HCl(mg) x 60 x Qs / (Vm(std) x 453,600)]... lb/hr

FIELD DATA SHEETS

BEST AVAILABLE COPY

Plant: FRI - Newberry Cement Plant
 Sample Loc.: Newberry, FL
 Control Type: ESP
 Sample Type: Method 8
 Date: 7/21/00 Run No.: 1
 Time Start: 10:56 Time End: 11:58
 Sample Time: 5/3/12 min/port 60 total min.
 Dry Bulb: °F Wet Bulb: °F VP @ DP: _____
 Bar. Pressure 29.96 Hg Stack Press.: _____ Hg P_s: 0.25 H₂O
 Moisture: 17 % FDA: _____ Gas Density Factor: _____
 Temperature: 85 °F Wind Dir.: West Wind Speed: 3-5
 Weather: Cloudy Thermocouple Readout: KAK-2
 Sample Box #: Mon-1 Meter Box No.: KA-4
 Meter Y: 0.997 @ Delta H: 1.376 Pitot Corr.: 0.84
 Nozzle Diameter: 0.308 in. Probe Length: 4 glass
 Probe Heater Setting: 240-250 °F Nomograph Cf: 1.6
 Stack Dimensions: _____ in Umbilical: 200
 Stack Area: _____ ft² Thermocouple _____
 Effective Stack Area: _____ ft² Probe No.: KAK-38 Stack Test Observers: _____
 Stack Height: ≥ 240 ft Pitot Tube: 1-A-50E

First Imp + 78m
 2, 3 Imp + 89
 Purged
 for 15
 min
 @
 2.45" H₂O

Material Processing Rate: _____
 Final Gas Meter Reading: 350.084 ft³
 Initial Gas Meter Reading: 299.600 ft³
 Total Metered Gas Volume: 50.484 ft³
 Condensate Gain in Impingers: 167 mL
 Weight Gain in Silica Gel: 30 g
 Total Moisture Gain: 197 mL
 Silica Gel Container No.: 4
 Filter Number: _____

Leak Check - Meter Box
 Initial: 0.015 cfm @ 15 in. H₂O
 Final: 0.010 cfm @ 6 in. H₂O

Leak Check - Pitot Tubes
 Impact 3 H₂O for 15 sec: Stable, Leak
 Static 3 H₂O for 15 sec: Stable, Leak



Test Conducted By: G. Haven, S. Bell
 O₂ = 9.7%
 CO₂ = 17.6%

Port and Traverse Point No.	Distance from Inside Stack Wall (in.)	Clock Time	Gas Meter Reading (ft ³)	Stack Velocity Head (H ₂ O)	Meter Orifice Pressure Difference (H ₂ O)		Stack Gas Temperature (F)	Sample Box Temperature (F)	Last Impinger Temperature (F)	Meter Temperature (F)	Vacuum on Sample Train (Hg)	Oxygen Meter Reading (% O ₂)
					Calculated	Actual						
Average:												
1-1			99.6	0.59	2.71	2.71	215	240	73	98	6	
2			304.5	0.58	2.48	2.48	214	241	60	98	6	
3			9.3	0.49	2.25	2.25	214.2	242	62	98	6	
2-1			13.8	0.89	2.71	2.71	214	244	68	98	6	
2			16.7	0.57	2.62	2.62	215	244	65	99	6	
3			23.6	0.48	2.21	2.21	213	241	66	100	6	
3-1			28.3	0.58	2.66	2.66	215	234	63	101	6	
3			23.0	0.51	2.50	2.50	215	211	63	100	6	

BEST AVAILABLE COPY

Plant: FRI Cement Kiln
 Sample Loc.: Newberry, FL
 Control Type: ESP
 Sample Type: Method 8
 Date: 7/21/00 Run No.: 2
 Time Start: 12:56 Time End: 19:18
 Sample Time: 5/3/12 min/port 60 total min.
 Dry Bulb: °F Wet Bulb: °F VP @ DP:
 Bar. Pressure 29.90 Hg Stack Press.: Hg P: 0.25 H₂O
 Moisture: 15 % FDA: Gas Density Factor:
 Temperature: 90 °F Wind Dir: West Wind Speed: 2.5
 Weather: Overcast Thermocouple Readout: KAK-2
 Sample Box #: Mono-1 Meter Box No.: KA4
 Meter Y: 0.997 @ Delta H: 1.376 Pitot Corr.: 0.84
 Nozzle Diameter: 0.278 in. Probe Length: 4 glass ft
 Probe Heater Setting: 245 Nomograph Cf: 2.14
 Stack Dimensions: 112" in Umbilical: 200"
 Stack Area: ft² Thermocouple
 Effective Stack Area: ft² Probe No.: KA-38
 Stack Height: 246" ft Pitot Tube: KA-551

Purged
 15 min
 @
 1.72" H₂O

Material Processing Rate:
 Final Gas Meter Reading: 420,231 ft³
 Initial Gas Meter Reading: 371,500 ft³
 Total Metered Gas Volume: 48,731 ft³
 Condensate Gain in Impingers: 143 mL
 Weight Gain in Silica Gel: 25 g
 Total Moisture Gain: 14.8 mL
 Silica Gel Container No.: 12
 Filter Number:

Leak Check - Meter Box
 Initial: 0.012 cfm @ 15 in. H₂O
 Final: 0.004 cfm @ 5 in. H₂O

Leak Check - Pitot Tubes
 Impact 3" H₂O for 15 sec: Stable Leak
 Static 3" H₂O for 15 sec: Stable Leak



Test Conducted By: G. Haven, S. Bell
 Stack Test Observers: CO₂ = 17%
O₂ = 4.7

Port and Traverse Point No.	Distance from Inside Stack Wall (in)	Clock Time	Gas Meter Reading (ft ³)	Stack Velocity Head (H ₂ O)	Meter Orifice Pressure Difference (H ₂ O)		Stack Gas Temperature (F)	Sample Box Temperature (F)	Last Impinger Temperature (F)	Meter Temperature (F)	Vacuum on Sample Train (Hg)	Oxygen Meter Reading (% O ₂)
					Calculated	Actual						
Average:												
1-1			71.5	0.63	1.97	1.97	215	248	82	103	5	
2			75.8	0.63	1.97	1.97	220	242	56	103	5	
3			80.0	0.50	1.57	1.58	217	241	56	102	5	
2-1			84.1	0.64	2.0	2.0	218	237	57	102	5	
2			88.5	0.60	1.88	1.88	218	244	66	103	5	
3			92.7	0.50	1.57	1.57	214	234	62	104	5	
3-1			96.7	0.63	1.98	1.98	214	232	64	103	5	

BEST AVAILABLE COPY

Plant: FR1 - Newberry, FL CementKkls
 Sample Loc.: _____
 Control Type: ESP
 Sample Type: Metrod 8
 Date: 7/21/00 Run No.: 3
 Time Start: 19:50 Time End: 09:59:59
 Sample Time: 3/5/12 min/port 60 total min.
 Dry Bulb: F Wet Bulb: F VP @ DP: _____
 Bar. Pressure 29.90 Hg Stack Press.: Hg Ps: 0.25 H2O
 Moisture: 15 % FDA: _____ Gas Density Factor: _____
 Temperature: 89 F Wind Dir.: VAR Wind Speed: 8-16
 Weather: Broken Thermocouple Readout: KAK-2
 Sample Box #: Mano7 Meter Box No.: KA-2
 Meter Y: 0.997 @ Delta H: 1.376 Pitot Corr.: 0.84
 Nozzle Diameter: 0.276 in. Probe Length: 4 glass
 Probe Heater Setting: 245 F Nomograph Cf: 3.17
 Stack Dimensions: 112 in Umbilical: 200
 Stack Area: _____ ft² Thermocouple _____
 Effective Stack Area: _____ ft² Probe No.: KAK-38
 Stack Height: 240 ft Pitot Tube: KA-55II

Purged
 15 min
 @
 1.85 "H2O

Material Processing Rate: _____
 Final Gas Meter Reading: 482.852 ft³
 Initial Gas Meter Reading: 4329.06 ft³
 Total Metered Gas Volume: 479.952 ft³
 Condensate Gain in Impingers: 148 mL
 Weight Gain in Silica Gel: 27 g
 Total Moisture Gain: 172 mL
 Silica Gel Container No.: 11
 Filter Number: _____

Leak Check - Meter Box
 Initial: 0.011 cfm @ 15 in. H2O
 Final: 0.005 cfm @ 6 in. H2O
 Leak Check - Pitot Tubes
 Impact 3 "H2O for 15 sec: Stable Leak
 Static 3 "H2O for 15 sec: Stable Leak



Test Conducted By: _____
 Stack Test Observers: O2 = 11.4
CO2 = 16.8%

Port and Traverse Point No.	Distance from Inside Stack Wall (in)	Clock Time	Gas Meter Reading (ft ³)	Stack Velocity Head (H2O)	Meter Orifice Pressure Difference (H2O)		Stack Gas Temperature (F)	Sample Box Temperature (F)	Last Impinger Temperature (F)	Meter Temperature (F)	Vacuum on Sample Train (Hg)	Oxygen Meter Reading (% O2)
					Calculated	Actual						
Average:												
1-1			32.9	0.62	1.96	1.96	220	262	80	98	6	
2			37.4	0.59	1.87	1.87	222	238	60	99	5	
3			41.5	0.50	1.59	1.59	217	238	60	100	5	
2-1			45.4	0.66	2.1	2.1	214	238	68	101	6	
2			49.7	0.64	2.03	2.03	219	238	62	102	6	
3			54.1	0.57	1.65	1.65	216	232	65	102	5	
3-1			58.1	0.62	1.97	1.97	219	240	68	102	6	

SAMPLING RATE CALCULATIONS

Date 7/21/00

Plant Name FRI

Location Newberry, FL

Source Cement Kilo

- ΔH = Orifice Reading (Inches H_2O)
- D_n = Nozzle Diameter (Inches)
- ΔH_E = Meter Box Constant
- B_w = Moisture Fraction
- T_m = Meter Temperature ($^{\circ}F$)
- T_s = Stack Temperature ($^{\circ}F$)
- M_s = Wet Molecular Weight of Stack Gas (From Table)
- ΔP = Pitot Reading (Inches H_2O)

$$\left[\frac{T_m + 460}{M_s(T_s + 460)} (1 - B_w)^2 \Delta H_E (D_n)^4 17741 \right] \Delta P = \Delta H$$

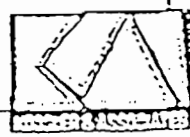
Molsture Fraction	M_s
0.0	29.0
0.05	28.5
0.10	27.9
0.15	27.4
0.20	26.8
0.25	26.2
0.30	25.7
0.35	25.2
0.40	24.6

$\frac{507}{27.2(470)}$ $\frac{507}{18224}$ $\frac{560}{27.4}$
 $\frac{568}{27.4(215+460)}$

	Run 1	Run 2	Run 3
$\frac{T_m + 460}{M_s (T_s + 460)}$	<u>0.0311</u>	<u>0.0367</u>	<u>0.0300</u>
$\times (1 - B_w)^2$	<u>0.6889</u>	<u>0.7225</u>	<u>0.7225</u>
$\times \Delta H_E$	<u>1.376</u>	<u>1.376</u>	<u>1.376</u>
$\times (D_n)^4$	<u>0.0027</u> <u>0.0088</u>	<u>0.0027</u> <u>0.0058</u>	<u>0.0060</u>
$\times 17741$	<u>17741</u>	<u>17741</u>	
$\times \Delta P$			
	1.41 4.6	1.46 3.14	3.17

$\times 0.75$
 $0.8 \quad 1.376$

0.8



LABORATORY DATA SHEETS

Acid Mist

~~SO₂~~
LAB DATA

Plant Name Florida Rock Industries Date Analyzed 7/28/00
Analyzed By G. Haven

Stack	Sample No.	V.T.	V.T.B.	N.	V.Soln.	V.A.	
Cement Kiln	Run 1-1	0.2	0.2	0.00975	500	100	
	1-2	0.2	0.2				
	2-1	0.2	0.2				
	2-2	0.25	0.2				
	3-1	0.2	0.2				
	3-2	0.2	0.2				
	IPA Blank 1	0.1					
	2	0.1					
	H ₂ O ₂ Blank 1	0.1				100	
	2	0.1				100	

- V.T. = Volume of Barium perchlorate titrant used for sample (ml)
- V.T.B. = Volume of Barium perchlorate titrant used for blank (ml)
- N. = Normality of Barium perchlorate.
- V.Soln. = Total solution volume
- V.A. = Volume of sample aliquot titrated (ml)



SO₂
LAB DATA

Plant Name Florida Rock Ind. Date Analyzed 7/28/00
 Analyzed By G. Haven

Stack	Sample No.	V.T.	V.T.B.	N.	V.Soln.	V.A.
Cement Kiln	Run 1-1	0.3	0.2	0.00975	1000	20
	1-2	0.35	0.2			
	Run 2-1	0.35	0.2			20 0.35
	Run 2-2	0.35	0.2			20 0.35
	Run 3-1	0.4	0.2			20
	3-2	0.3	0.2			20
Blank	H ₂ O ₂	0.1			↓	100
Blank	IPA	0.1				100
				↓		

- V.T. = Volume of Barium perchlorate titrant used for sample (ml)
- V.T.B. = Volume of Barium perchlorate titrant used for blank (ml)
- N. = Normality of Barium perchlorate.
- V.Soln. = Total solution volume
- V.A. = Volume of sample aliquot titrated (ml)



KOGLER & ASSOCIATES

CHAIN OF CUSTODY RECORD

Project Number _____

Project Name _____

Sample Location _____

Florida Rock Industries

Cement Kilo

Newberry, FL

Sample Identification

Remarks

FHR1

Front half train Run #1

FHR2

" " " " #2

FHR3

" " " " #3

BHR1

Back Half train Run #1

BHR2

" " " " #2

BHR3

" " " " #3

SG# 4

Silica Gel # 4

SG# 12

" " # 12

SG# 11

" " # 11

Sampled By: (Signature) _____

Glen A. Nason

Date: 7/21/00

Time: _____

see DATA SHEETS

Relinquished By: (Sign) _____

Date: _____

Time: _____

Received By: (Sign) _____

Date: _____

Time: _____

Relinquished By: (Sign) _____

Date: _____

Time: _____

Received By: (Sign) _____

Date: _____

Time: _____

Relinquished By: (Sign) _____

Date: _____

Time: _____

Received By Lab: (Sign) _____

Glen A. Nason

Date: 7/21/00

Time: 23:00

Sample Shipped VIA: _____

UPS

Fed Express

Bus

Shipping Bill Number: _____



PLANT OPERATING DATA

INFORMATION REQUIRED IN
GENERAL STACK TEST REPORTS

Permit Number ACC01-267311

Source I.D. # —

Permit Expiration Date —

Permit Conditions:

Production Rate 149.9 ~~139.83~~

Emission Limits (PM, SO₂, VE, etc.) —

Fuel Limits (Sulfur, etc.) —

Test Conducted (P.M., VE, SO₂, NO_x, etc.) Acid mist

Actual Production Rate 139.83

Measured Emission Rates 0.78 lb/hr SO₂, 0.007 lb/hr H₂SO₄ mist

List of Measured Parameters as Required by Permit

Scrubber ΔP —

Scrubber Water Flow —

Scrubber Water Pressure —

Baghouse ΔP —

Baghouse Inlet Temperature —

*Type of Fuel Coal

Fuel Use Rate —

*Fuel Analysis —

Name of DEP Observer L. Lalwani

Date of Last Inspection Performed by Plant Personnel —

Discussion of any Problems (non-isokinetic, missing runs, plant upset, etc.)

—
—
—



Florida Rock Industries, Inc.
Cement Group
Thompson S. Baker Cement plant

Process Weight Rate Sheet

Source: Kiln/Raw Mill Stack

Test Date: July 21, 2000

Permit No.: AC01-267311

Permitted Rate: 149.9 TPH

Test Parameter(s): Sulfuric Acid Mist (H₂SO₄) & Sulfur Dioxide (SO₂)

	<u>Run Times</u>	<u>Process Input Rate</u>
Run No. 1	<u>1050</u> - <u>1158</u>	<u>135.5</u> TPH
Run No. 2	<u>1250</u> - <u>1918</u>	<u>144</u> TPH
Run No. 3	<u>1950</u> - <u>2059</u>	<u>140</u> TPH

I here by certify that to the best of my knowledge the above data is true and correct.

George Townsend
Name (Print)

George Townsend
Signature

July 31, 2000
Date

Environmental & Safety Manager
Title

EQUIPMENT CALIBRATIONS

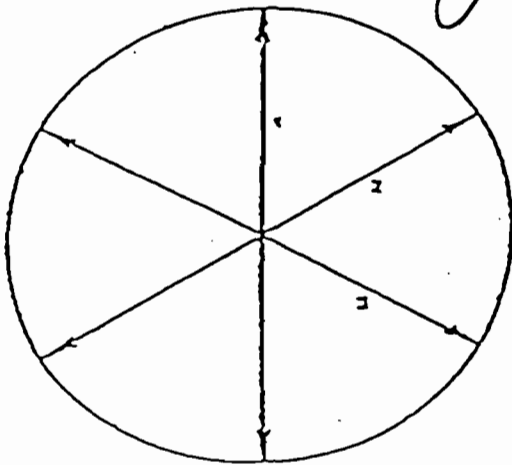
NOZZLE CALIBRATION

DATE 7/21/00
PLANT NAME FRI
LOCATION Newberry, FL
SOURCE Cement Kiln

<u>Measurement No.</u>	<u>Inside Diameter (inches)</u>
<u>1</u>	<u>0.308</u> <u>0.227</u>
<u>2</u>	<u>0.308</u> <u>0.227</u>
<u>3</u>	<u>0.308</u> <u>0.227</u>

Average 0.308
~~0.227~~
Area of Nozzle _____ ft²

Calibrated by: Glen A. Haer



Nozzle X-Section



NOZZLE CALIBRATION

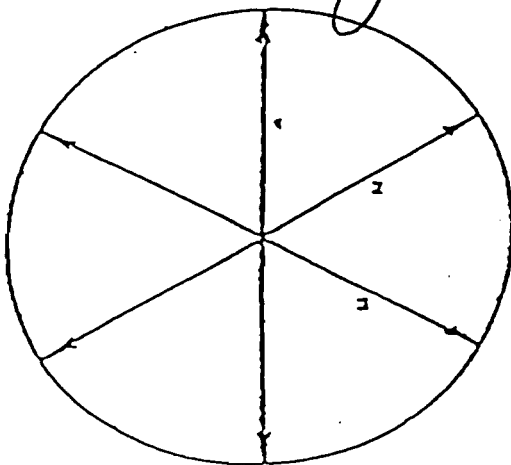
DATE 7/21/00
PLANT NAME FRI
LOCATION Newberry FL
SOURCE Cement Kiln

<u>Measurement No.</u>	<u>Inside Diameter (inches)</u>
<u>1</u>	<u>0.277</u>
<u>2</u>	<u>0.278</u>
<u>3</u>	<u>0.279</u>

Average 0.278

Area of Nozzle _____ ft²

Calibrated by: *J. A. Van*



Nozzle X-Section



PITOT TUBE CALIBRATION MEASUREMENTS

PITOT TUBE IDENTIFICATION NO. KA-55 II

DATE CALIBRATED 7-5-00

PITOT TUBE ASSEMBLY LEVEL ? YES NO

PITOT TUBE OPENINGS DAMAGED ? YES (EXPLAIN BELOW) NO

$\alpha_1 = 1.5^\circ$ ($< 10^\circ$) $\alpha_2 = 1.5^\circ$ ($< 10^\circ$)

$\beta_1 = 2.5^\circ$ ($< 5^\circ$) $\beta_2 = 2.0^\circ$ ($< 5^\circ$)

$Y = 1.5^\circ$, $\theta = 2.0^\circ$, $A = 0.948$ IN. = (PA+PB)

$Z = A \sin Y = 0.0248$ IN. (< 0.125 IN.)

$W = A \sin \theta = 0.0331$ IN. (< 0.031 IN.)

$P_A = 0.464$ IN. $P_B = 0.466$ IN.

$D_t = 0.377$ IN. (≥ 0.1875 IN. ≤ 0.3750 IN.)

COMMENTS: Pitot tube looked ok. day after test.

[Signature]

CALIBRATION REQUIRED? YES NO

CALIBRATED BY: R Paul

POST TEST THERMOCOUPLE
CALIBRATION

DATE ~~8/2~~ 7/21/00
PLANT NAME Florida Rock Industries
LOCATION Newberry, FL
SOURCE Cement Kilo

Thermocouple Readout # KAK-2

Umbilical Cord # 200'

Switch Box # KAK-2

Thermocouple # KAK-38

Average Stack Temperature °F 220°

*Observed Mercury in Glass (ASTM) °F 215

Observed Thermocouple Reading °F 217

Percent Difference $\frac{675 \text{ (ASTM + 460)} - 677 \text{ (Thermo + 460)}}{675 \text{ (ASTM - 460)}} \times 100 = -0.296\%$

Tolerance $\leq 1.5\%$

* Observed Temperature must be within ten percent of the average stack temperature.

[Handwritten Signature]
Signature



KOGLER & ASSOCIATES, ENVIRONMENTAL SERVICES
 ANNUAL THERMOCOUPLE CALIBRATION 12/27/99

KA70 RO/UMB		ICE (F)	ASTM (F)	AMB. (F)	ASTM (F)	212 (F)	ASTM (F)	400 (F)	ASTM (F)	KA70 RO/UMB		
KA1/100'	STACK	32	33	73	72	208	209	405	406	KA1/100'	STACK	
	BOX	33	32	72	72	210	210	404	406		BOX	
	IMP	32	32	73	73	211	212	400	401		IMP	
KA2/200'	STACK	33	33	73	72	209	210	415	416	KA2/200'	STACK	
	BOX	32	32	72	73	211	210	418	418		BOX	
	IMP	32	33	71	72	212	212	409	410		IMP	
KA3/25' SWBXXA3	STACK	32	33	73	73	211	210	409	410	KA3/25'	STACK	
	BOX	33	32	72	73	215	215	415	416		BOX	
	IMP	33	32	72	73	212	212	408	407		IMP	
KA4/25' SWBXXA3	STACK	32	32	73	74	205	205	420	420	KA4/25'	STACK	
	BOX	32	33	74	74	207	208	422	421		BOX	
	IMP	32	33	72	73	211	212	425	425		IMP	
KAK/200K KAK-38 SWBXXAK1	STACK	31	32	74	74	213	213	419	420	KAK/200K	STACK	
	BOX	32	32	72	73	215	216	422	422		KAK-38	BOX
	IMP	32	33	74	73	219	220	400	401		IMP	
KA1/200'	STACK	33	33	73	73	211	210	422	422	KA1/200'	STACK	
	BOX	33	33	73	72	214	214	419	418		BOX	
	IMP	33	32	73	72	209	209	425	425		IMP	
KA2/100'	STACK	33	33	73	72	209	210	422	423	KA2/100'	STACK	
	BOX	33	32	73	74	212	211	425	425		BOX	
	IMP	32	33	72	73	212	211	426	425		IMP	

Signature *[Handwritten Signature]*
 Date 12/27/99

KOUGLER & ASSOCIATES, ENVIRONMENTAL SERVICES
 ANNUAL THERMOCOUPLE CALIBRATION 12/27/99

THERMOCOUPLE #	ICE (F)	ASTM (F)	AMB. (F)	ASTM (F)	212 (F)	ASTM (F)	400 (F)	ASTM (F)	THERMOCOUPLE #
KA-06	33	33	73	74	212	212	420	419	KA-06
KA-07	33	32	74	75	209	210	421	422	KA-07
KA-08	34	33	74	74	211	211	415	416	KA-08
KA-09	33	33	74	74	215	216	416	417	KA-09
KA-10	34	33	72	72	214	215	408	407	KA-10
KA-11	33	33	72	72	212	212	415	414	KA-11
KA-12	33	33	73	72	219	220	408	407	KA-12
KA-38	34	33	73	74	211	211	412	411	KA-38
KA-39	34	33	73	73	212	211	416	415	KA-39
KA-50	33	34	74	73	215	214	415	416	KA-50
KA-64	33	33	74	74	211	211	410	411	KA-64
KA-70	33	33	73	74	212	213	405	406	KA-70
KA-71	34	34	73	73	211	210	407	408	KA-71
KA-72	34	33	72	72	216	215	410	410	KA-72
KA-105	34	33	73	73	217	218	404	405	KA-105
KA-108	34	34	72	73	214	215	412	411	KA-108
KA-115	34	33	72	72	213	214	409	410	KA-115
KA-126	34	33	72	72	216	216	410	409	KA-126

THERMOCOUPLE #	ICE (F)	ASTM (F)	AMB. (F)	ASTM (F)	212 (F)	ASTM (F)	400 (F)	ASTM (F)	THERMOCOUPLE #
KAK-08	32	32	73	74	218	217	407	406	KAK-08
KAK-09	31	31	73	73	211	212	405	406	KAK-09
KAK-10	32	32	74	74	209	210	377	376	KAK-10
KAK-11	31	31	75	75	206	206	399	398	KAK-11
KAK-12	32	31	74	74	218	217	407	406	KAK-12
KAK-38	31	31	74	74	210	211	410	410	KAK-38
KAK-65	32	32	74	74	205	205	377	377	KAK-65
KAK-72	31	31	74	75	208	208	400	401	KAK-72
KAK-110	31	32	75	74	209	210	399	400	KAK-110
KAK-07	32	31	75	74	209	210	389	390	KAK-07

VOST SWITCH BOX	T. COUPLE				
CH#1	C-1	32	33	74	75
CH#2	C-1	33	32	74	74
CH#3	C-1	33	33	75	74

VOST SWITCH BOX					
CH#1	C-2	32	33	73	74
CH#2	C-2	33	33	74	75
CH#3	C-2	32	33	75	75

Signature *Stephen J. Bee*
 Date 12/27/99

KOOGLER & ASSOCIATES, ENVIRONMENTAL SERVICES
 ANNUAL THERMOCOUPLE CALIBRATION 12/27/99

Range (μ C)	Measured Voltage (mV)	Measured Voltage (V)	Calc. Temp. (μ C)	Readout Temp. (μ C)	Percent Difference (%)
KAK-12	28.7	0.029	690	693	-0.45023
	37.4	0.037	902	900	0.217654
KAK-38	28.9	0.029	694	698	-0.51192
	37.2	0.037	897	900	-0.33898
KAK-72	28.5	0.029	685	687	-0.30387
	37.5	0.038	904	908	-0.39058
KAK-65	28.2	0.028	678	680	-0.32666
	37.8	0.038	912	910	0.218082
KA-110	29	0.029	694	699	-0.65592
	37	0.037	894	899	-0.50758

EQUATIONS :

$$T(\text{calc.}) = (0.226584602 + (24152.109 * V) + (67233.4248 * V^2) + (2210340.682 * V^3) - (860963914.9 * V^4) + (48350600000 * V^5) - (1184520000000 * V^6) + (13869000000000 * V^7) - (63370800000000 * V^8))$$

Where :

V = Measured Voltage (Volts)

T(calc.) = Temperature calculated based on voltage

Signature Steph S. Bee

Date 12/27/99

BERYLLIUM TESTS

POST-TEST DRY GAS METER CALIBRATION FORM

COMPANY: Florida Rock Industries
 SOURCE: Cement Kiln
 DATE: August 9, 2000
 PRETEST Y: 0.997
 TEST METER NUMBER: KA-1
 METER BOX NUMBER: KA-4
 BAROMETRIC PRESSURE (Pb): 30.01
 DELTA H (dH): 2

	TEST METER READING (ft ³)	DRY GAS READING (ft ³)	TIME (min) ±	VACUUM SETTING (in. Hg)
INITIAL	304.563	321.225		
FIRST	310.023	326.635	6.1	6
SECOND	319.263	335.835	10.3	6
THIRD	328.421	345.017	10.2	6

DELTA H	TEST METER Vt (ft ³)	DRY GAS Vd (ft ³)	TEST METER TEMP. Tt (F)	DRY GAS TEMP. Td (F)
2	5.460	5.410	77.5	81.5
PB	9.240	9.200	77.5	84.5
30.01	9.158	9.182	77	87

	Yi	Yi	Yi
		$Vt \cdot Pb \cdot (Td + 460)$	$Vd \cdot (Pb + dH / 13.6) \cdot (Tt + 460)$
RUN 1 (Yi)=	1.011794	88727.26	87692.95
RUN 2 (Yi)=	1.012466	150985.7	149126.6
RUN 3 (Yi)=	1.011005	150332.8	148696.4
AVG. Y =	1.011755		

PRETEST Y = 0.997
 AVG. DELTA Y = 0.014755
 DELTA Y LIMIT = 0.05
 IS TEST WITHIN 5%? YES

- Vt = Gas volume passing through the test meter, ft³
- Vd = Gas volume passing through the dry gas meter, ft³
- Tt = Temperature of the gas in the test meter, |F
- Tdi = Temperature of the inlet gas of the dry gas meter, |F
- Tdo = Temperature of the outlet gas of the dry gas meter, |F
- Td = Average temperature of the gas in the dry gas meter, the average of Tdi and Tdo, |F
- dH = Pressure difference accross the orifice, in, H2O
- Yi = Ratio of test meter to dry gas meter for each run
- Y = Average ratio of accuracy of test meter to dry gas meter for all three runs, tolerance = pretest · 0.05·Y
- ± = Time of calibration run, min
- Pb = Barometric pressure, in Hg.

DRY GAS METER AND ORIFICE CALIBRATION

CONTROL BOX NO. KA-4 BAROMETRIC PRESS. 30.39 IN. HG.
 DATE FEB. 22, 2000 PERFORMED BY ROC

	RUN 1	RUN 2	RUN 3	RUN 4	RUN 5
VACUUM ("Hg)	0.0	0.0	0.0	0.0	0.0
dHw ("H2O)	-0.28	-0.30	-0.33	-0.37	-0.43
dHd ("H2O)	0.50	1.00	1.50	2.50	3.50
INITIAL WTM	3.036	28.727	994.704	20.046	9.754
FINAL WTM	9.754	34.540	1003.036	28.727	20.046
INITIAL DGM	103.007	129.171	94.618	120.249	109.760
FINAL DGM	109.760	135.141	103.007	129.171	120.249
TEMP. WTM (F)	68.00	69.00	68.00	69.00	68.00
TEMP. DGM (F)	76.00	80.00	75.00	80.00	78.00
TEST TIME (MIN.)	14.50	9.00	11.00	9.00	9.00

NET VOLUME WTM	6.718	5.813	8.332	8.681	10.292
NET VOLUME DGM	6.753	5.970	8.389	8.922	10.489
Y	1.009	0.992	1.004	0.988	0.992
dH@	1.264	1.296	1.421	1.453	1.447

 AVERAGE Y = 0.997
 ACCEPTABLE Y RANGE = 0.980 TO 1.020 OK
 AVERAGE dH@ = 1.376

$$Y = \frac{(V_w (P_b - (dH_w / 13.6)) \times (T_d + 460))}{(V_d (P_b + (dH_d / 13.6)) \times (T_w + 460))}$$

$$dH@ = 0.0317 \times dH_d / (P_b (T_d + 460)) \times ((T_w + 460) \times \text{time}) / V_w^2$$

CALCULATIONS

SUMMARY OF SOURCE EMISSION TEST DATA

Florida Rock Industries
 Cement Kiln
 July 24, 2000

Run No.	Process Weight Rate (Tons/hr)	Stack Gas Flow Rate (SCFMD)	Stack Gas Temperature (F)	Stack Gas Moisture (%)	Total Beryllium	
					Conc. (gr/dscf)	Emission Rate (Lbs/Hr)
1	135.0	93,275	246	17.0	0.0001	0.06
2	140.0	98,112	248	16.0	0.0001	0.12
3	140.0	129,320	200	16.0	0.0000	0.01
Average	138.3	106,903	231	16.3	0.0001	0.06

GENERAL DATA

DATA FILE NAME: BERYLM

```

Company      : Florida Rock Industries          *****
Source/Unit  : Cement Kiln                      11:10 AM
Date         : July 24, 2000                    Cp           : 0.840
Stack dia.   : 112.00 inch      OR   : Duct Length : 0.00 inch
Oxygen Corr. : 0.0 percent                Duct Width  : 0.00 inch
CO2 Corr.    : 0.0 percent                 Std. Temp.  : 68 F
    
```

FUEL ANALYSIS DATA, (By F Factor or Fuel Use)

F Factor = F, Fuel Use = U F Process Wt.

```

Hydrogen, wt% : 0.00      Run 1 : 135 Tons/hr
Carbon,  wt%  : 0.00      Run 2 : 140
Sulfur,  wt%  : 0.00      Run 3 : 140
Nitrogen, wt% : 0.00
Oxygen,  wt%  : 0.00
Btu/lb     : 0
    
```

Type of Flow Meter : (1=Meter Box 2=Mass Flow Meter) 1

F-Factor : dscf/MMBtu; -----

FIELD DATA	METHOD 5	RUN 1	RUN 2	RUN 3
		1	2	3

Meter Temp., Tm (F)	94	98	98
Stack Temp., Ts (F)	246	248	200
Sq.Rt. dP	0.57	0.60	0.74
dH (in. H2O)	1.04	1.13	1.73
Meter Vol., Vm (ft3)	75.612	77.352	96.896
Meter Y	0.997	0.997	0.997
Bar. Press., Pb (in.Hg.)	30.13	30.13	30.13
Vol. H2O, Vlc (ml)	315	299	374
Static Press., Ps (in.H2O)	-0.24	-0.24	-0.24
Test Time (min.)	120.0	120.0	120.0
Nozzle Dia., Dn (in.)	0.280	0.280	0.280
Oxygen, O2 (%)	8.5	7.8	9.8
Carbon Dioxide, CO2 (%)	22.4	24.1	15.0
Carbon Monoxide, CO (%)	0.0	0.0	0.0
Report Emission Criteria in ? 1 = lb/hr g = gr/dscf :			L
Process Rate Units ? T = Ton/hr, L = Lbs/hr, C = Cans/min:			T
Allowable Particulate Matter Emission Rate			

LABORATORY RESULTS	RUN 1	RUN 2	RUN 3
	1	2	3

GRAVIMETRIC ANALYSIS METHOD 5 :

Front Half Wash (FHW)	0.00036	0.00066	0.00005	grams
Filterable Sample (MF)	0.00000	0.00000	0.00000	
Condensable Sample (BHW)	0.00000	0.00000	0.00000	

SOURCE TEST CALCULATIONS

PLANT : Florida Rock Industries
Cement Kiln

RUN NO.: 1
DATE : July 24, 2000

STD.TEMP, Tstd = 68 F	STATIC PRESS., Ps = -0.24 in. H2O
METER TEMP, Tm = 93.5 F	PITOT COFF., Cp = 0.840
STACK TEMP, Ts = 246.3 F	STACK I.D. = 112.00 inch
AVG.VEL.HEAD,dP = 0.323 in. H2O	DUCT LENGTH = inch
METER ORIFICE,dH= 1.04 in. H2O	DUCT WIDTH = inch
METER VOL., Vm = 75.612 Cu.Ft.	STACK AREA, As = 68.417 Sq.Ft.
METER COFF., Y = 0.997	TEST TIME = 120.00 min.
BAR. PRESS., Pb = 30.13 in.Hg	NOZZLE DIA. = 0.280 inch
COND.(Vlc) = 315.0 ml	NOZZLE DIA., An = 4.3E-04 Sq.Ft.

GAS ANALYSIS = 8.50 % O2	0.00 % CO
22.40 % CO2	69.10 % N2

$Vm(std) = [(T(std) + 460) / 29.92] \times Vm \times Y \times (Pb + (dH / 13.6)) / (Tm + 460)$	=	72.600	dscf
$Vw(std) = (8.9148 \times 10e-5) \times (Tstd + 460) \times Vlc$	=	14.827	scf
$Bws = Vw(std) / (Vm(std) + Vw(std))$	=	0.170	Lower Bws value used.
$Bws @ Saturated Conditions = Vapor Press. of H2O @ Dew Point Temp. / (Ps, in.Hg.)$	=	1.000	
$\%EA = (\%O2 - 0.5\%CO) / (0.264\%N2 - (\%O2 - 0.5\%CO)) \times 100$	=	87.25	
$Md = (.44 \times \%CO2) + (.32 \times \%O2) + [.28 \times (\%N2 + \%CO)]$	=	31.92	
$Ms = (Md \times (1-Bws)) + (18.0 \times Bws)$	=	29.56	
$P(stack) = Pbar + (Ps / 13.6)$	=	30.11	in. Hg
$vs = 85.49 \times CP \times (Sq.Rt.dP) \times [Sq.Rt.(Ts + 460) / (Ms \times P(stack))]$	=	36.37	ft/sec
$Qs = vs \times As \times 60$	=	149,303	acf/min
$Qs(std) = Qs \times (1-Bws) \times ((Tstd + 460) / (Ts + 460)) \times (P(stack) / 29.92)$	=	93,275	dscf/min
$I = (Ts+460) \times [(0.002669 \times Vlc) + (Vm(std) / (T(std) + 460) / 29.92)] \times 100 / [Time \times P(stack) \times An \times vs \times 60]$	=	103.79	%

SOURCE TEST CALCULATIONS

PLANT : Florida Rock Industries
 Cement Kiln

RUN NO.: 2
 DATE : July 24, 2000

STD.TEMP, Tstd = 68 F	STATIC PRESS., Ps = -0.24 in. H2O
METER TEMP, Tm = 98.33 F	PITOT COFF., Cp = 0.840
STACK TEMP, Ts = 247.8 F	STACK I.D. = 112.00 inch
AVG.VEL.HEAD,dP = 0.355 in. H2O	DUCT LENGTH = inch
METER ORIFICE,dH= 1.13 in. H2O	DUCT WIDTH = inch
METER VOL., Vm = 77.352 Cu.Ft.	STACK AREA, As = 68.417 Sq.Ft.
METER COFF., Y = 0.997	TEST TIME = 120.00 min.
BAR. PRESS., Pb = 30.13 in.Hg	NOZZLE DIA. = 0.280 inch
COND.(Vlc) = 299.0 ml	NOZZLE DIA., An = 4.3E-04 Sq.Ft.

GAS ANALYSIS = 7.80 % O2	0.00 % CO
24.10 % CO2	68.10 % N2

Vm(std) = [T(std) + 460 / 29.92] x Vm x Y x (Pb + (dH / 13.6)) / (Tm + 460).....	=	73.644	dscf
Vw(std) =(8.9148 x 10e-5) x (Tstd + 460) x Vlc	=	14.074	scf
Bws = Vw(std) / (Vm(std) + Vw(std)).....	=	0.160	Lower Bws value used.
Bws @ Saturated Conditions = Vapor Press. of H2O @ Dew Point Temp. / (Ps, in.Hg.)	=	1.000	
%EA =(%O2 - 0.5%CO) / (0.264%N2 - (%O2-0.5%CO)) x 100	=	76.63	
Md =(.44 x %CO2) + (.32 x %O2) + [.28 x (%N2 + %CO)]	=	32.17	
Ms = (Md x (1-Bws)) + (18.0 x Bws).....	=	29.89	
P(stack) = Pbar + (Ps / 13.6)	=	30.11	in. Hg
vs = 85.49 x CP x (Sq.Rt.dP) x [Sq.Rt.(Ts + 460) / (Ms x P(stack))]	=	37.92	ft/sec
Qs = vs x As x 60	=	155,646	acf/min
Qs(std) = Qs x (1-Bws)x((Tstd + 460)/(Ts + 460)) x (P(stack)/29.92)	=	98,112	dscf/min
I = (Ts+460) x [(0.002669 x Vlc) + (Vm(std) / (T(std) + 460) / 29.92] x 100 / [Time x P(stack) x An x vs x 60]	=	100.09	%

SOURCE TEST CALCULATIONS

PLANT : Florida Rock Industries
Cement Kiln

RUN NO.: 3
DATE : July 24, 2000

STD.TEMP, Tstd = 68 F	STATIC PRESS., Ps = -0.24 in. H2O
METER TEMP, Tm = 98.17 F	PITOT COFF., Cp = 0.840
STACK TEMP, Ts = 200.3 F	STACK I.D. = 112.00 inch
AVG.VEL.HEAD, dP = 0.552 in. H2O	DUCT LENGTH = inch
METER ORIFICE, dH = 1.73 in. H2O	DUCT WIDTH = inch
METER VOL., Vm = 96.896 Cu.Ft.	STACK AREA, As = 68.417 Sq.Ft.
METER COFF., Y = 0.997	TEST TIME = 120.00 min.
BAR. PRESS., Pb = 30.13 in.Hg	NOZZLE DIA. = 0.280 inch
COND.(Vlc) = 374.0 ml	NOZZLE DIA., An = 4.3E-04 Sq.Ft.

GAS ANALYSIS = 9.80 % O2	0.00 % CO
15.00 % CO2	75.20 % N2

$Vm(std) = [T(std) + 460 / 29.92] \times Vm \times Y \times (Pb + (dH / 13.6)) / (Tm + 460) \dots\dots$	=	92.414	dscf
$Vw(std) = (8.9148 \times 10e-5) \times (Tstd + 460) \times Vlc$	=	17.604	scf
$Bws = Vw(std) / (Vm(std) + Vw(std)) \dots\dots\dots$	=	0.160	Lower Bws value used.
$Bws @ \text{Saturated Conditions} = \text{Vapor Press. of H2O @ Dew Point Temp.} / (Ps, \text{in.Hg.}) \dots\dots\dots$	=	0.779	
$\%EA = (\%O2 - 0.5\%CO) / (0.264\%N2 - (\%O2 - 0.5\%CO)) \times 100 \dots$	=	97.49	
$Md = (.44 \times \%CO2) + (.32 \times \%O2) + [.28 \times (\%N2 + \%CO)]$	=	30.79	
$Ms = (Md \times (1 - Bws)) + (18.0 \times Bws) \dots\dots\dots$	=	28.75	
$P(stack) = Pbar + (Ps / 13.6) \dots\dots\dots$	=	30.11	in. Hg
$vs = 85.49 \times CP \times (Sq.Rt.dP) \times [Sq.Rt.(Ts + 460) / (Ms \times P(stack))] \dots\dots\dots$	=	46.60	ft/sec
$Qs = vs \times As \times 60 \dots\dots\dots$	=	191,311	acf/min
$Qs(std) = Qs \times (1 - Bws) \times ((Tstd + 460) / (Ts + 460)) \times (P(stack) / 29.92) \dots\dots\dots$	=	129,320	dscf/min
$I = (Ts + 460) \times [(0.002669 \times Vlc) + (Vm(std) / (T(std) + 460) / 29.92)] \times 100 / [Time \times P(stack) \times An \times vs \times 60] \dots\dots\dots$	=	95.29	%

A. FIELD DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln
 DATE : July 24, 2000

	RUN 1	RUN 2	RUN 3
Vlc = Vol water collected in train, ml	315.0	299.0	374.0
Vm = Sample gas vol, meter cond., acf	75.612	77.352	96.896
Y = Meter calibration factor	0.9970	0.9970	0.9970
Pbar = Barometric pressure, in. Hg	30.13	30.13	30.13
Pstatic = Stack static pressure, in. H2O	-0.24	-0.24	-0.24
dH = Avg meter pressure diff, in. H2O	1.04	1.13	1.73
Tm = Absolute meter temp., degrees R	553.5	558.3	558.2
Vm(std) = Sample gas vol, Std. cond., dscf	72.600	73.644	92.414
Bws = Water vapor in gas stream, fraction	0.170	0.160	0.160
MF = Moisture factor (1 - Bws)	0.830	0.840	0.840
CO2 = Carbon Dioxide, dry, volume %	22.40	24.10	15.00
O2 = Oxygen, dry, volume %	8.50	7.80	9.80
N2 = Nitrogen, dry volume %	69.10	68.10	75.20
Md = Molecular weight of stack gas, dry	31.92	32.17	30.79
Ms = Molecular weight of stack gas, wet	29.56	29.89	28.75
Cp = Pitot tube coefficient	0.84	0.84	0.84
Sq.Rt. dP = Avg. square root of each dP	0.5686	0.5955	0.7430
Ts = Absolute stack temp., degrees R	706.3	707.8	660.3
A = Area of stack, ft2	68.42	68.42	68.42
Qstd = Volumetric flowrate, dscfm	93,275	98,112	129,320
An = Nozzle area, ft2	4.28E-04	4.28E-04	4.28E-04
0 = Sample time, minutes	120.00	120.00	120.00
%I = Isokinetic variation, percent	103.79	100.09	95.29

B. PARTICULATE DATA SUMMARY

PLANT : Florida Rock Industries
 Cement Kiln
 DATE : July 24, 2000

	RUN 1	RUN 2	RUN 3
Sample Weight (FHW + MF + BHW), mg	0.36	0.66	0.05
Meter Volume, standard cond., Vm(std)	72.600	73.644	92.414
Carbon Dioxide, percent	22.40	24.10	15.00
Oxygen, percent	8.50	7.80	9.80
Sample Concentration :			
gr/scf	0.0001	0.0001	0.0000
gr/dscf	0.0001	0.0001	0.0000
gr/dscf @ 0 % CO2	0.0000	0.0001	0.0000
gr/dscf @ 0 % O2	0.0001	0.0002	0.0000
ppm * MW (dry gas).....	4.2	7.6	0.4
ppm * MW @ 0% CO2	0.0	0.0	0.0
ppm * MW @ 0% O2	7.1	12.1	0.8

EMISSION RATE CALCULATIONS

PLANT :Florida Rock Industries
Cement Kiln

RUN NO.: 1

STANDARD TEMP. : 68 F DATE : July 24, 2000

```
*****
Front Half Wash (FHW)      0.00036 grams   Vm(std)  72.600 ft3
Mass Filter (MF)           0.00000 grams   Vw(std)  14.827 ft3
Back Half Wash (BHW)      0.00000 grams   Qs(std)  93,275 dscfm
Vm(std) SO2                dscf          Bws      0.170
CO2 CORR      0.0 %        CO2      22.40 %
O2 CORR.      0.0 %        O2       8.50 %
*****
```

F-FACTOR

10E6 x [3.64(%H) + 1.53(%C) + 0.57(%S) + 0.14(%N) - 0.46(%O2)] / (Btu/lb) x [(Tstd + 460)/528] dscf/MMBtu

FUEL USE

Use Rate (gal/ton) * Process Wt. (ton/hr) gal/hr
Heat Input = (Process Weight (ton/hr) x Heating MMBtu/hr
Value (Btu/gal) x Fuel Use Rate (gal/ton) / 1E6

TOTAL PARTICULATE

15.432 x (FHW + MF + BHW) / [(Vm(std) + Vw(std))] ... 0.0001 gr/scf
15.432 x (FHW + MF + BHW) / (Vm(std)) 0.0001 gr/dscf
gr/dscf x (12 / %CO2) 0.0000 @ 0% CO2
gr/dscf x [(20.9 - Oxygen corr.) / (20.9 - %O2)] ... 0.0001 @ 0% O2
0.00857 x Qs(std) x gr/dscf 0.06 lb/hr
F-Fac x 1.4286E-4 x [20.9 / (20.9-%O2)] x gr/dscf .. lb/MMBtu
Particulate (lb/hr) / Heat Input (MMBtu/hr) lb/MMBtu

TOTAL ACID MIST

[1.0811E-4 x (Vt - Vtb) x N x Vsol] / Vol(alog) lb Acid Mist
[Acid Mist (lb) / Vm std (ft^3)] x Qs std x 60 ... lb/hr
[Acid Mist (lb) / Vm std (ft^3)] x F-Factor lb/MMBtu

SULFUR DIOXIDE (SO2)

[7.061E-5 x (Vt - Vtb) x N x Vsol] / Vol(alog) lb SO2
[SO2 (lb) / Vm std (ft^3)] x Qs std (ft^3/min) x 60 lb/hr
[SO2 (lb) / Vm std (ft^3)] x F lb/MMBtu
[Mass SO2 (lb) x 385 / 64E+6 (ft^3/lb)] / Vm (std) ppm
ppm x 0.0 % Corr. / 22.4 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 8.5% O2 Stack) ppm @ 0% O2
SO2 (lb/hr / Heat Input) lb/MMBtu

HYDROGEN CHLORIDE DATA SUMMARY

[Mass HCl(mg) x 385 x 1E6] / [453600 x 36.5 x Vm(std) ppm
ppm x 0.0 % Corr. / 22.4 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 22.4% O2 Stack) ppm @ 0% O2
[Mass HCl(mg) x 60 x Qs / (Vm(std) x 453,600)]... lb/hr

EMISSION RATE CALCULATIONS

PLANT :Florida Rock Industries
Cement Kiln

RUN NO.: 2
DATE : July 24, 2000

STANDARD TEMP. : 68 F

```
*****
Front Half Wash (FHW)      0.00066 grams      | Vm(std)  73.644 ft3
Mass Filter (MF)           0.00000 grams      | Vw(std)  14.074 ft3
Back Half Wash (BHW)      0.00000 grams      | Qs(std)  98,112 dscfm
Vm(std) SO2                dscf                | Bws      0.160
CO2 CORR      0.0 %        | CO2      24.10 %
O2 CORR.      0.0 %        | O2       7.80 %
*****
```

F-FACTOR

10E6 x [3.64(%H) + 1.53(%C) + 0.57(%S) + 0.14(%N) - 0.46(%O2)] / (Btu/lb) x [(Tstd + 460)/528] dscf/MMBtu

FUEL USE

Use Rate (gal/ton) * Process Wt. (ton/hr) gal/hr
Heat Input = (Process Weight (ton/hr) x Heating MMBtu/hr
Value (Btu/gal) x Fuel Use Rate (gal/ton) / 1E6

TOTAL PARTICULATE

15.432 x (FHW + MF + BHW) / [(Vm(std) + Vw(std))] ... 0.0001 gr/scf
15.432 x (FHW + MF + BHW) / (Vm(std) 0.0001 gr/dscf
gr/dscf x (12 / %CO2) 0.0001 @ 0% CO2
gr/dscf x [(20.9 - Oxygen corr.) / (20.9 - %O2)] ... 0.0002 @ 0% O2
0.00857 x Qs(std) x gr/dscf 0.12 lb/hr
F-Fac x 1.4286E-4 x [20.9 / (20.9-%O2)] x gr/dscf .. lb/MMBtu
Particulate (lb/hr) / Heat Input (MMBtu/hr) lb/MMBtu

TOTAL ACID MIST

[1.0811E-4 x (Vt - Vtb) x N x Vsol] / Vol(alog) lb Acid Mist
[Acid Mist (lb) / Vm std (ft^3)] x Qs std x 60 ... lb/hr
[Acid Mist (lb) / Vm std (ft^3)] x F-Factor lb/MMBtu

SULFUR DIOXIDE (SO2)

[7.061E-5 x (Vt - Vtb) x N x Vsol] / Vol(alog) . lb SO2
[SO2 (lb) / Vm std (ft^3)] x Qs std (ft^3/min) x 60 lb/hr
[SO2 (lb) / Vm std (ft^3)] x F lb/MMBtu
[Mass SO2 (lb) x 385 / 64E+6 (ft^3/lb)] / Vm (std) ppm
ppm x 0.0 % Corr. / 22.4 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 22.4% O2 Stack ppm @ 0% O2
SO2 (lb/hr / Heat Input) lb/MMBtu

HYDROGEN CHLORIDE DATA SUMMARY

[Mass HCl(mg) x 385 x 1E6] / [453600 x 36.5 x Vm(std) ppm
ppm x 0.0 % Corr. / 24.1 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 24.1% O2 Stack ppm @ 0% O2
[Mass HCl(mg) x 60 x Qs / (Vm(std) x 453,600)]... lb/hr

EMISSION RATE CALCULATIONS

PLANT :Florida Rock Industries
Cement Kiln

RUN NO.: 3

STANDARD TEMP. : 68 F DATE : July 24, 2000

```
*****
Front Half Wash (FHW)      0.00005 grams      Vm(std)  92.414 ft3
Mass Filter (MF)           0.00000 grams      Vw(std)  17.604 ft3
Back Half Wash (BHW)      0.00000 grams      Qs(std) 129,320 dscfm
Vm(std) SO2                dscf              Bws      0.160
CO2 CORR      0.0 %        CO2      15.00 %
O2 CORR.      0.0 %        O2       9.80 %
*****
```

F-FACTOR

10E6 x [3.64(%H) + 1.53(%C) + 0.57(%S) + 0.14(%N) - 0.46(%O2)] / (Btu/lb) x [(Tstd + 460)/528] dscf/MMBtu

FUEL USE

Use Rate (gal/ton) * Process Wt. (ton/hr) gal/hr
Heat Input = (Process Weight (ton/hr) x Heating MMBtu/hr
Value (Btu/gal) x Fuel Use Rate (gal/ton) / 1E6

TOTAL PARTICULATE

15.432 x (FHW + MF + BHW) / [(Vm(std) + Vw(std))] ... 0.0000 gr/scf
15.432 x (FHW + MF + BHW) / (Vm(std)) 0.0000 gr/dscf
gr/dscf x (12 / %CO2) 0.0000 @ 0% CO2
gr/dscf x [(20.9 - Oxygen corr.) / (20.9 - %O2)] ... 0.0000 @ 0% O2
0.00857 x Qs(std) x gr/dscf 0.01 lb/hr
F-Fac x 1.4286E-4 x [20.9 / (20.9-%O2)] x gr/dscf .. lb/MMBtu
Particulate (lb/hr) / Heat Input (MMBtu/hr) lb/MMBtu

TOTAL ACID MIST

[1.0811E-4 x (Vt - Vtb) x N x Vsol] / Vol(alog) lb Acid Mist
[Acid Mist (lb) / Vm std (ft^3)] x Qs std x 60 ... lb/hr
[Acid Mist (lb) / Vm std (ft^3)] x F-Factor lb/MMBtu

SULFUR DIOXIDE (SO2)

[7.061E-5 x (Vt - Vtb) x N x Vsol] / Vol(alog) . lb SO2
[SO2 (lb) / Vm std (ft^3)] x Qs std (ft^3/min) x 60 lb/hr
[SO2 (lb) / Vm std (ft^3)] x F lb/MMBtu
[Mass SO2 (lb) x 385 / 64E+6 (ft^3/lb)] / Vm (std) ppm
ppm x 0.0 % Corr. / 22.4 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 22.4% O2 Stack ppm @ 0% O2
SO2 (lb/hr / Heat Input) lb/MMBtu

HYDROGEN CHLORIDE DATA SUMMARY

[Mass HCl(mg) x 385 x 1E6] / [453600 x 36.5 x Vm(std) ppm
ppm x 0.0 % Corr. / 15.0 % CO2 in Stack ppm @ 0% CO2
ppm x (20.9% - 0.0% O2 Corr)/(20.9% - 15.0% O2 Stack ppm @ 0% O2
[Mass HCl(mg) x 60 x Qs / (Vm(std) x 453,600)]... lb/hr

FIELD DATA SHEETS

BEST AVAILABLE COPY

Plant: FRI Cement Kiln
 Sample Loc.: Newberry, FL
 Control Type: ESP
 Sample Type: Method 104
 Date: 7/24/00 Run No.: 1
 Time Start: 08:50 Time End: 11:02
 Sample Time: 10/3/12 min/port 120 total min.
 Dry Bulb: F Wet Bulb: F VP @ DP:
 Bar. Pressure 30.13 Hg Stack Press.: -0.24 Ps: 3.83 H2O
 Moisture: 15 % FDA: Gas Density Factor:
 Temperature: 83 °F Wind Dir.: South Wind Speed: 5-7
 Weather: Cloudy Thermocouple Readout: KAK-2
 Sample Box #: Mano-1 Meter Box No.: KA-4
 Meter Y: 0.997 @ Delta H: 1.376 Pitot Corr.: 0.84
 Nozzle Diameter: 0.280 in. Probe Length: 49/655 ft
 Probe Heater Setting: 245 °F Nomograph Ct: 3.19
 Stack Dimensions: 112" in Umbilical: 200"
 Stack Area: ft² Thermocouple
 Effective Stack Area: ft² Probe No.: KAK-38
 Stack Height: 3246' ft Pitot Tube: KA-55II

Stack Dimensions

Material Processing Rate:
 Final Gas Meter Reading: 571.512 ft³
 Initial Gas Meter Reading: 495.900 ft³
 Total Metered Gas Volume: 75.612 ft³
 Condensate Gain in Impingers: 299 mL
 Weight Gain in Silica Gel: 66 g
 Total Moisture Gain: 315 mL
 Silica Gel Container No.:
 Filter Number: B

Leak Check - Meter Box

Initial: 0.011 cfm @ 15 in. H2O
 Final: 0.008 cfm @ 6 in. H2O

Leak Check - Pitot Tubes

Impact 3 H2O for 15 sec: Stable Leak
 Static 3 H2O for 15 sec: Stable Leak



Test Conducted By: G. Haven, S. Bell

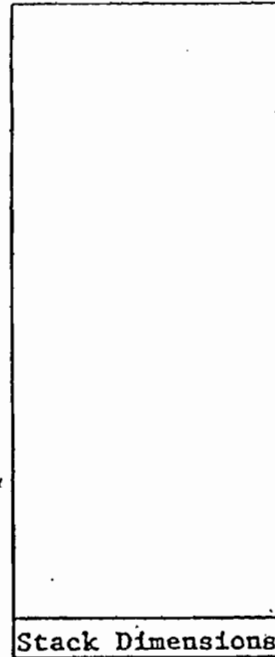
Stack Test Observers: CO2 = 22.4%
O2 = 8.5%

Port and Traverse Point No.	Distance from Inside Stack Wall (in.)	Clock Time	Gas Meter Reading (ft ³)	Stack Velocity Head (H2O)	Meter Orifice Pressure Difference (H2O)		Stack Gas Temperature (F)	Sample Box Temperature (F)	Last Impinger Temperature (F)	Meter Temperature (F)	Vacuum on Sample Train (H ₂ O)	Oxygen Meter Reading (% O ₂)
					Calculated	Actual						
Average:												
1-1			95.9	0.34	1.08	1.08	247	239	79	88	5	
2			2.4	0.30	0.95	0.96	247	233	58	91	5	
3			8.5	0.26	0.83	0.83	246	245	62	93	4	
2-1			14.2	0.36	1.15	1.15	248	241	67	96	5	
2			20.7	0.32	1.02	1.02	249	240	57	97	5	
3			27.0	0.25	0.80	0.80	244	235	59	97	5	
3-1			32.6	0.35	1.12	1.12	242	248	61	96	5	

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6+170+9842

Plant: FRI Cement Kiln
 Sample Loc.: Newberry, FL
 Control Type: ESP
 Sample Type: Method 104
 Date: 7/24/00 Run No.: 2
 Time Start: 11:27 Time End: 13:31
 Sample Time: 10/3/12 min/port 60 total min.
 Dry Bulb: °F Wet Bulb: °F VP @ DP:
 Bar. Pressure 30.13 "Hg Stack Press.: "Hg -0.24 Ps: 0.85 "H2O
 Moisture: 15 % FDA: Gas Density Factor:
 Temperature: 87 °F Wind Dir.: West Wind Speed: 3-5
 Weather: Broken Thermocouple Readout: KAK-2
 Sample Box #: M6mo-1 Meter Box No.: KA-4
 Meter Y: 0.997 @ Delta H: 1.376 Pitot Corr.: 0.84
 Nozzle Diameter: 0.280 in. Probe Length: 4 glass ft
 Probe Heater Setting: 245 °F Nomograph Cf: 3.12
 Stack Dimensions: 112" in Umbilical: 200"
 Stack Area: ft² Thermocouple:
 Effective Stack Area: ft² Probe No.: KAK-38
 Stack Height: 3240 ft Pitot Tube: KA-58II



Stack Dimensions

Material Processing Rate:
 Final Gas Meter Reading: 649,152 ft³
 Initial Gas Meter Reading: 571,800 ft³
 Total Metered Gas Volume: 77,352 ft³
 Condensate Gain in Impingers: 276 mL
 Weight Gain in Silica Gel: 23 g
 Total Moisture Gain: 299 mL
 Silica Gel Container No.: 32
 Filter Number:

Leak Check - Meter Box
 Initial: 0.0012 cfm @ 15 in. H2O
 Final: 0.011 cfm @ 8 in. H2O
 Leak Check - Pitot Tubes
 Impact 3 "H2O for 15 sec: Stable, Leak
 Static 3 "H2O for 15 sec: Stable, Leak



Test Conducted By: G. Huen, S. Bell
CO2 = 24.1 %
 Stack Test Observers: O2 = 7.8 %

Port and Traverse Point No.	Distance from Inside Stack Wall (in.)	Clock Time	Gas Meter Reading (ft ³)	Stack Velocity Head ("H2O)	Meter Orifice Pressure Difference ("H2O)		Stack Gas Temperature (F)	Sample Box Temperature (F)	Last Impinger Temperature (F)	Meter Temperature (F)	Vacuum on Sample Train (Hg)	Oxygen Meter Reading (% O2)
					Calculated	Actual						
Average:												
1-1			71.8	0.49	1.53	1.53	229	242	80	90	8	
2			79.4	0.46	1.44	1.44	243	251	66	92	7	
3			86.6	0.27	0.84	0.84	249	245	66	94	6	
2-1			92.4	0.32	1.0	1.0	247	246	70	96	6	
2			98.5	0.31	0.97	0.97	259	249	65	97	6	
3			604.5	0.23	0.72	0.72	253	243	64	98	6	
3-1			9.7	0.32	1.0	1.0	249	245	64	99	6	

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Plant: FRI - Cement Kiln
 Sample Loc.: Newberry, FL
 Control Type: ESP
 Sample Type: Method 104
 Date: 7/24/00 Run No.: 3
 Time Start: 14:12 Time End: 16:18
 Sample Time: 0.3/2 min/port 120 total min.
 Dry Bulb: °F Wet Bulb: °F VP @ DP:
 Bar. Pressure 30.17 Hg Stack Press.: 30.11 Hg -0.24 H₂O
 Moisture: 15 % FDA: Gas Density Factor:
 Temperature: 87 °F Wind Dir.: South Wind Speed: 7-10
 Weather: Broken Thermocouple Readout: KAF-2
 Sample Box #: Mon-1 Meter Box No.: KAF-2
 Meter Yr: 644 @ Delta H: 1.376 Pitot Corr.: 0.84
 Nozzle Diameter: 0.280 in. Probe Length: 49/45
 Probe Heater Setting: 245 °F Nomograph Cf: 3.12
 Stack Dimensions: 112 in Umbilical: 200
 Stack Area: 68.4 ft² Thermocouple
 Effective Stack Area: 66.4 ft² Probe No.: KAX-38
 Stack Height: 3240 ft Pitot Tube: KA-5516

Material Processing Rate:
 Final Gas Meter Reading: 746.396 ft³
 Initial Gas Meter Reading: 649.500 ft³
 Total Metered Gas Volume: 96.896 ft³
 Condensate Gain in Impingers: 355 mL
 Weight Gain in Silica Gel: 19 g
 Total Moisture Gain: 374 mL
 Silica Gel Container No.: 33
 Filter Number: C

Leak Check - Meter Box

Initial: 6.018 cfm @ 15 in. H₂O
 Final: 0.002 cfm @ 9 in. H₂O

Leak Check - Pitot Tubes

Impact 3 H₂O for 15 sec: Stable Leak
 Static 3 H₂O for 15 sec: Stable Leak



Test Conducted By: G. Haven, S. Bell
CO₂ = 15% O₂ = 9.8%
 Stack Test Observers:

Port and Traverse Point No.	Distance from Inside Stack Wall (in)	Clock Time	Gas Meter Reading (ft ³)	Stack Velocity Head (H ₂ O)	Meter Orifice Pressure Difference (H ₂ O)		Stack Gas Temperature (F)	Sample Box Temperature (F)	Last Impinger Temperature (F)	Meter Temperature (F)	Vacuum on Sample Train (Hg)	Oxygen Meter Reading (% O ₂)
					Calculated	Actual						
Average:												
1-1			49.5	0.65	2.02	2.02	201	248	74	100	8	
2			58.5	0.60	1.92	1.92	200	239	61	100	8	
3			66.8	0.44	1.37	1.37	199	244	64	100	6	
2-1			74.1	0.62	1.93	1.93	200	235	68	98	7	
2			82.5	0.60	1.92	1.92	200	241	63	97	8	
3			90.6	0.43	1.34	1.34	199	243	63	98	6	
3-1			99.2	0.63	1.96	1.96	201	245	67	98	8	

SAMPLING RATE CALCULATIONS

Date 7/24/00

Plant Name FRI

Location Newberry, FL

Source Cement Kiln

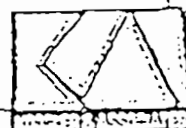
- ΔH = Orifice Reading (Inches H_2O)
- D_n = Nozzle Diameter (Inches)
- ΔH_E = Meter Box Constant
- B_w = Moisture Fraction
- T_m = Meter Temperature ($^{\circ}F$)
- T_s = Stack Temperature ($^{\circ}F$)
- M_s = Wet Molecular Weight of Stack Gas (From Table)
- ΔP = Pitot Reading (Inches H_2O)

$$\left[\frac{T_m + 460}{M_s(T_s + 460)} (1 - B_w)^2 \Delta H_E (D_n)^4 17741 \right] \Delta P = \Delta H$$

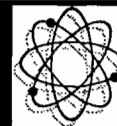
Moisture Fraction	M_s
0.0	29.0
0.05	28.5
0.10	27.9
0.15	27.4
0.20	26.8
0.25	26.2
0.30	25.7
0.35	25.2
0.40	24.6

550
 $27.4(215+466) = 18495$
 555

	Run 1	Run 2	Run 3
$\frac{T_m + 460}{M_s (T_s + 460)}$	= 0.0297	0.629	
$\times (1 - B_w)^2$	= 0.7225	0.7225	
$\times \Delta H_E$	= 1.376	1.376	
$\times (D_n)^4$	= 0.0061	0.0061	
$\times 17741$	= 17741	17741	
$\times \Delta P$	=		
	3.19	3.12	



LABORATORY DATA SHEETS



**CHEMICAL
LABORATORIES
INCORPORATED**

Received From: Koogler Assoc.
4014 NW 13th St.
Gainsville, FL 32609

Date Reported : Aug29 2000
Project Number : FL Rock Ind.
PO Number : 187-00-09
FLDOH Number : E83018
NYSDOH Number : 11595
CTDPH Number : 0173
NCDEHNR Number : 296
SCDHEC Number : 96019

For: Be
Date Sampled: Jul25 2000 Date Received: Aug 9 2000 Lab Numbers: 31688-31697

REPORT OF ANALYSIS

	Beryllium
	mg
Accuracy:	91.8
Precision:	.620
Det.Limit:	.00010
Client ID	
Lab Number	
CONT1R1	
31688	0.359
CONT2R1	
31689	<0.00010
CONT3R1	
31690	<0.00010
CONT1R2	
31691	0.212
CONT2R2	
31692	<0.00010
CONT3R2	
31693	0.444
CONT1R3	
31694	0.0472
CONT2R3	
31695	<0.00010

Certificate of Results

Sample integrity certified prior to analysis. Test results meet all requirements of the NELAC Standards, except as noted in the QA Report Section 4. This Report may not be reproduced in part, results relate only to items tested.

Jefferson L. Flowers, Ph.D
Jefferson S. Flowers, Ph.D
481 NEWBURYPORT Av.
ALTAMONTE SPRINGS
FLORIDA 32715-0597
BUS: (407) 339-5984
FAX: (407) 260-6110

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FLOWERS



CHEMICAL
LABORATORIES
INCORPORATED

Received From: Koogler Assoc.
4014 NW 13th St.
Gainesville, FL 32609

Date Reported : Aug29 2000
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Date Sampled: Jul25 2000 Date Received: Aug 9 2000 Lab Numbers: 31688-31697

REPORT OF ANALYSIS

Beryllium
mg
Accuracy: 91.8
Precision: .620
Det.Limit: .00010
Client ID
Lab Number

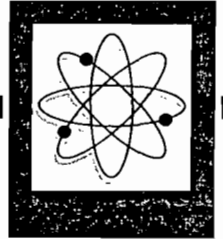
CONT3R3
31696 <0.00010

FILTDIBLANKS
31697 <0.00010

Certificate of Results

Sample integrity certified prior to analysis. Test results meet all requirements of the NELAC Standards, except as noted in the QA Report Section 4. This Report may not be reproduced in part, results relate only to items tested.

Jefferson S. Flowers, Ph.D.
President/Technical Director



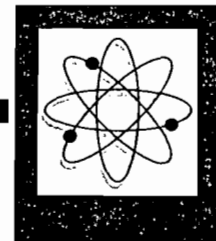
Received From:
Koogler Assoc.
4014 NW 13th St.
Gainesville, FL 32609

Date Reported : Aug29 2000
Project Number : FL Rock Ind.
PO Number : 187-00-09
FLDOH Number : E83018
NYSDOH Number : 11595
CTDPH Number : 0173
NCDEHNR Number : 296
SCDHEC Number : 96019

For: Be
Date Sampled: Jul25 2000 Date Received: Aug 9 2000 Lab Numbers: 31688-31697
REPORT OF INFORMATION

Parameter	Unit	Limit	Expected Value	Range	Correlation
				31688	
Beryllium	mg	-	- 0.359		
				31689	
Beryllium	mg	-	- .00020		
				31690	
Beryllium	mg	-	- .00020		
				31691	
Beryllium	mg	-	- 0.212		
				31692	
Beryllium	mg	-	- .00020		
				31693	
Beryllium	mg	-	- 0.444		

The above information is intended to highlight exceptional data as compared to the upper control limits (Limit) established for each of the parameters. Range exceedances are flagged by integer values in the Range column. The Expected values are derived from historical data. Expected is computed as either the mean or computed directly from another parameter using linear regression. All known correlation rule exceedances are listed as enumerated rule numbers in the Correlation column. Correlation pair rules are defined on the last page.



Received From:
Koogler Assoc.
4014 NW 13th St.
Gainesville, FL 32609

Date Reported : Aug29 2000
Project Number : FL Rock Ind.
PO Number : 187-00-09
FLDOH Number : E83018
NYSDOH Number : 11595
CTDPH Number : 0173
NCDEHNR Number : 296
SCDHEC Number : 96019

For: Be
Date Sampled: Jul25 2000 Date Received: Aug 9 2000 Lab Numbers: 31688-31697
REPORT OF INFORMATION

Parameter Unit	Limit	Expected Value	Range	Correlation
			31694	
Beryllium mg	-	- 0.0472		
			31695	
Beryllium mg	-	- .00020		
			31696	
Beryllium mg	-	- .00020		
			31697	
Beryllium mg	-	- .00020		

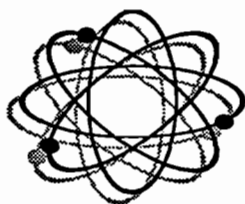
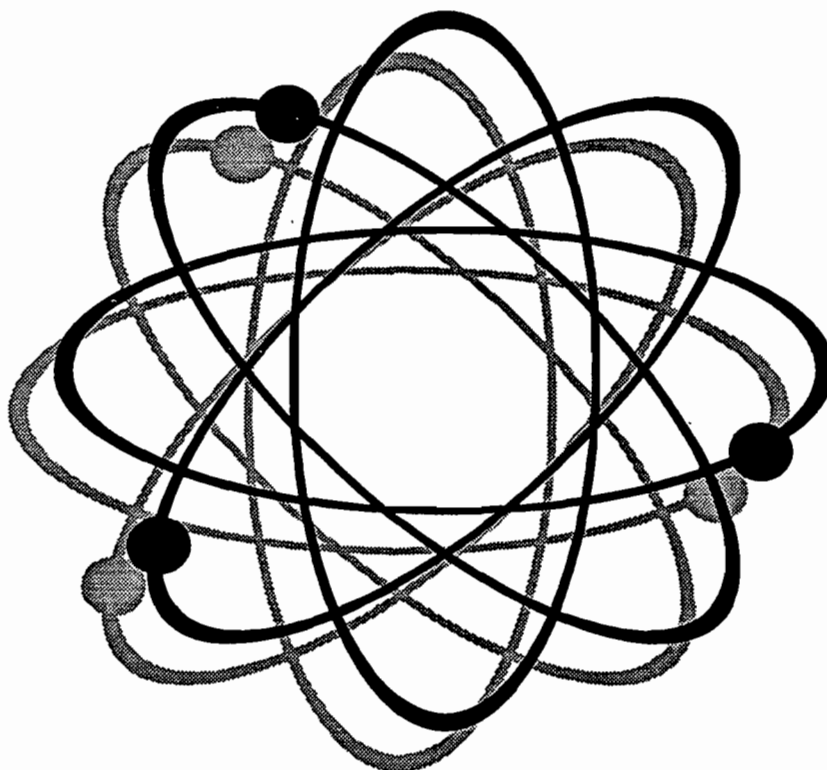
The above information is intended to highlight exceptional data as compared to the upper control limits (Limit) established for each of the parameters. Range exceedances are flagged by integer values in the Range column. The Expected values are derived from historical data. Expected is computed as either the mean or computed directly from another parameter using linear regression. All known correlation rule exceedances are listed as enumerated rule numbers in the Correlation column. Correlation pair rules are defined on the last page.

282		FLOWERS CHEMICAL LABORATORIES																
		ANALYTICAL RESULTS FORM										FLDOH Number E83018						
Parameter	Symbol	Unit	Cont1 R1	Cont2 R1	Cont3 R1	Cont1 R2	Cont2 R2	Cont3 R2	Cont1 R3	Cont2 R3	Cont3 R3	Filt/DI Blanks	QA		Section		Analys	Date
Beryllium	*	mg	0.359	<0.0001U	<0.0001U	0.212	<0.0001U	0.444	0.0472	<0.0001U	<0.0001U	<0.0001U	EPA200.8	0.0001	0.629	91.8	MAN	08-18-2000 10:50
			Date Received:		08-09-00		Typed:		08-29-00		Sent:		08-29-00					
Project Number	FL Rock Ind.		Qualifier Key															
PO Number	187-00-09		J Surrogate recovery limits have been exceeded;															
Date Sampled	1 07-25-00 *		No known quality control criteria exists for the component;															
Date Analyzed	0		The sample matrix interfered with the ability to make any accurate determination.															
Compacted			Q Sample held beyond the accepted holding time.															
Format	NormL		U Indicates that the compound was analyzed for but not detected.															
Unit Cost	Exted		V Indicates that the analyte was detected in both the sample and the associated method blank.															
Ba	1200 10 *																	

Quality Assurance Report

Prepared for: Koogler Assoc.
Project Number: FL Rock Ind.
Lab Numbers: 31688 - 31697

Report date: 29-Aug-00



**FLOWERS
CHEMICAL
LABORATORIES**



FLOWERS CHEMICAL LABORATORIES, INC.

QA SDG Narrative Summary

Client: Koogler Assoc.
Project Number: FL Rock Ind.
P.O. Number: 187-00-09
Date Sampled: 25-Jul-00
Lab Numbers: 31688 - 31697

Sample Handling

Sample handling and holding time criteria were met for all samples.
Samples Collected by Submitter. No unusual events occurred during analysis.

The requested analytes did not require surrogates.

Accuracy / Precision:

QCCS Check Sample:

Standards Traceability:

The t-test limits were met for all calibration standards as shown in section 5.
The t-test limits were met for all QCCS standards as shown in section 5.
The t-test limits were met for all matrix spike standards as shown in section 5.
There was 1 standard blank.
The t-test limits were met for all surrogate spike standards as shown in section 5.



FLOWERS CHEMICAL LABORATORIES, INC.

QA Section 5

Standards Traceability

Client: Koogler Assoc.
 Project Number: FL Rock Ind.
 P.O. Number: 187-00-09
 Date Sampled: 25-Jul-00
 Lab Numbers: 31688 - 31697

Compound Name	Manufacturer Name	Manufacturer Lot #	Rec Lot #	Rec By	Date Recieved	Valid Until	Prep Lot #	Prep By	Date Prepared	Valid Until	t-test	t-test range	Contro Mean	Contro Std	Lot Mean	Lot Std
			Standard				Lot									
Beryllium	Fisher	9NFS30Z471	1095	EVB	01-10-00	12-30-00	1446	EVB	01-19-00	12-30-00	3.02	>1.68	1.10		0.962	0.068
QCCS	Fisher	9NFS30Z471	1095	MAN	01-10-00	12-30-00	1734	MAN	07-05-00	11-30-00			1.03	0.092	1.10	
Matrix Spike	Fisher	9NFS30Z471	1095	MAN	01-10-00	12-30-00	1570	EVB	03-07-00	09-07-00	2.77	>1.68	1.10		1.11	0.054
EPA200.8 Blank	Flowers Chemical Laboratories	Valid	34	JSF	01-01-95	12-31-01	14	JSF	01-01-95	01-01-01						

Knogler

CHAIN OF CUSTODY RECORD

Project Number 187-00-09
 Project Name Florida Rock Industries
 Sample Location Cement Kiln
Newberry, FL

Please analyze for Beryllium.

Sample Identification

Remarks

Cont. 1 R1 FRI	Filter Run #1	Florida Rock Ind.	31688
Cont. 2 R1 (2)	Impinger Catch #1		31689
Cont. 3 R1	Probe Rinse Run #1		31690
Cont. 1 R2	Filter Run #2		31691
Cont. 2 R2	Impinger Catch Run #2		31692
Cont. 3 R2	Probe Rinse Run #2		31693
Cont. 1 R3	Filter Run #3		31694
Cont. 2 R3	Impinger Catch Run #3		31695
Cont. 3 R3	Probe Rinse Run #3		31696
Filter + DiH ₂ O	Acetone reagent blanks	Reagent Blanks	31697

please combine
 please combine
 please combine
 please combine
 please combine
 please combine

Sampled By: (Signature) Glen A. Haen Date: 7/24/00 Time: 11:00 ⁴ see DATA SHEETS
 Relinquished By: (Sign) Glen A. Haen Date: 8/1/00 Time: 16:00
 Received By: (Sign) _____ Date: _____ Time: _____
 Relinquished By: (Sign) _____ Date: _____ Time: _____
 Received By: (Sign) _____ Date: _____ Time: _____
 Relinquished By: (Sign) _____ Date: _____ Time: _____
 Received By Lab: (Sign) R. Nowak Date: 8-9-00 Time: 2:00 PM

Sample Shipped VIA: UPS Fed Express Bus
 Shipping Bill Number: _____



PM: Kathy Dorris

Flowers Chemical Laboratories, Inc.
Cooler Receipt, Custody Record Verification, Preservation Form

Client: Koogler Assoc. FCL Lab #: 31688 - 31697

Project: FL Rock Ind.

Cooler Rec'd on 08/09/00 16:0 Cooler opened on: 08-09-00

Rec'd b SJW Log-in date: 08-09-00

	Yes	No	NA
a. Airbills or airbill stickers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Traffic reports or packing lists	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Custody seals on shipping containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Custody seals intact?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Custody seal numbers	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
if yes, _____			
f. Airbill or airbill sticker	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Shipped via: _____ Airbill #: _____			
g. Cooler Temperature upon receipt <u>Room</u> Degrees C			
h. If sample vials received, were bubbles observed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Client/FCL chain-of-custody forms present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Was condition of shipping containers OK	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Sample tags present	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l. Were sample containers in good condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m. Were all containers labeled correctly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
n. Did all labels agree with Chain of Custody record	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o. Were correct containers sent for requested analysis	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
p. Were samples properly preserved (see below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
q. Project Manager notified as to discrepancies	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Explanation of Discrepancies/Remarks: _____

Preservation Check		Yes	No	Returned Containers	
pH	Reagent				
>12	NaOH	<input type="checkbox"/>	<input checked="" type="checkbox"/>	P.250mL	1
<2	HNO3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	P.500mL	
<2	H2SO4	<input type="checkbox"/>	<input checked="" type="checkbox"/>	P.1L	
<2	HCL	<input type="checkbox"/>	<input checked="" type="checkbox"/>	P.2L	
	Na2S2O3	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Wir-Pac	
				40mlVil	
				G.250mL	
				G.500mL	
				G.1L	
				G.4L	

PLANT OPERATING DATA

Florida Rock Industries, Inc.
Cement Group
Thompson S. Baker Cement plant

Process Weight Rate Sheet

Source: Kiln/Raw Mill Stack

Test Date: July 24, 2000

Permit No.: AC01-267311

Permitted Rate: 149.9 TPH

Test Parameter(s): Beryllium (Be)

	<u>Run Times</u>	<u>Process Input Rate</u>	
Run No. 1	<u>850</u> - <u>1102</u>	<u>135</u>	TPH
Run No. 2	<u>1127</u> - <u>1331</u>	<u>140</u>	TPH
Run No. 3	<u>1412</u> - <u>1618</u>	<u>140</u>	TPH

I here by certify that to the best of my knowledge the above data is true and correct.

George Townsend
Name (Print)

George Townsend
Signature

July 31, 2000
Date

Environmental & Safety Manager
Title

EQUIPMENT CALIBRATIONS

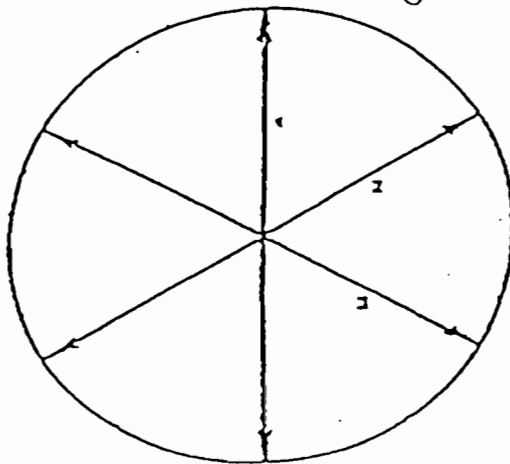
NOZZLE CALIBRATION

DATE 7/24/00
PLANT NAME FRI
LOCATION Newberry, FL
SOURCE Cement Kiln

<u>Measurement No.</u>	<u>Inside Diameter (inches)</u>
<u>1</u>	<u>0.280</u>
<u>2</u>	<u>0.280</u>
<u>3</u>	<u>0.280</u>

Average 0.280
Area of Nozzle _____ ft²

Calibrated by: *John A. Haven*



Nozzle X-Section



PITOT TUBE CALIBRATION MEASUREMENTS

PITOT TUBE IDENTIFICATION NO. KA-55 II

DATE CALIBRATED 7-5-00

PITOT TUBE ASSEMBLY LEVEL ? YES NO

PITOT TUBE OPENINGS DAMAGED ? YES (EXPLAIN BELOW) NO

$\alpha_1 = 1.5^\circ$ ($< 10^\circ$) $\alpha_2 = 1.5^\circ$ ($< 10^\circ$)

$\beta_1 = 2.5^\circ$ ($< 5^\circ$) $\beta_2 = 2.0^\circ$ ($< 5^\circ$)

$\gamma = 1.5^\circ$, $\theta = 2.0^\circ$, $A = 0.948$ IN. = (PA+PB)

$Z = A \sin \gamma = 0.0248$ IN. (< 0.125 IN.)

$W = A \sin \theta = 0.0331$ IN. (< 0.031 IN.)

$P_A = 0.464$ IN. $P_b = 0.466$ IN.

$D_t = 0.377$ IN. (≥ 0.1875 IN. ≤ 0.3750 IN.)

COMMENTS: Pitot tube looked ok. day of test.
[Signature]

CALIBRATION REQUIRED? YES NO

CALIBRATED BY: R Paul

POST TEST THERMOCOUPLE
CALIBRATION

DATE 7/24/00
PLANT NAME FRT
LOCATION Newberry, AL
SOURCE Cement Kiln

Thermocouple Readout # KAK-2

Umbilical Cord # 200

Switch Box # KAK-2

Thermocouple # KAK-38

Average Stack Temperature °F _____

*Observed Mercury in Glass (ASTM) °F _____

Observed Thermocouple Reading °F _____

Percent Difference $\frac{(ASTM + 460) - (Thermo + 460)}{(ASTM + 460)} \times 100 =$ _____

Tolerance $\leq 1.5\%$

* Observed Temperature must be within ten percent of the average stack temperature.

John A. Hines
Signature



KOOGLER & ASSOCIATES, ENVIRONMENTAL SERVICES
 ANNUAL THERMOCOUPLE CALIBRATION 12/27/99

KA70 RO/UMB		ICE (F)	ASTM (F)	AMB. (F)	ASTM (F)	212 (F)	ASTM (F)	400 (F)	ASTM (F)	KA70 RO/UMB		
KA1/100'	STACK	32	33	73	72	208	209	405	406	KA1/100'	STACK	
	BOX	33	32	72	72	210	210	404	406		BOX	
	IMP	32	32	73	73	211	212	400	401		IMP	
KA2/200'	STACK	33	33	73	72	209	210	415	416	KA2/200'	STACK	
	BOX	32	32	72	73	211	210	418	418		BOX	
	IMP	32	33	71	72	212	212	409	410		IMP	
KA3/25' SWBXKA3	STACK	32	33	73	73	211	210	409	410	KA3/25'	STACK	
	BOX	33	32	72	73	215	215	415	416		BOX	
	IMP	33	32	72	73	212	212	408	407		IMP	
KA4/25' SWBXKA3	STACK	32	32	73	74	205	205	420	420	KA4/25'	STACK	
	BOX	32	33	74	74	207	208	422	421		BOX	
	IMP	32	33	72	73	211	212	425	425		IMP	
KAK/200K KAK-38 SWBXKAK1	STACK	31	32	74	74	213	213	419	420	KAK/200K	STACK	
	BOX	32	32	72	73	215	216	422	422		KAK-38	BOX
	IMP	32	33	74	73	219	220	400	401		IMP	
KA1/200'	STACK	33	33	73	73	211	210	422	422	KA1/200'	STACK	
	BOX	33	33	73	72	214	214	419	418		BOX	
	IMP	33	32	73	72	209	209	425	425		IMP	
KA2/100'	STACK	33	33	73	72	209	210	422	423	KA2/100'	STACK	
	BOX	33	32	73	74	212	211	425	425		BOX	
	IMP	32	33	72	73	212	211	426	425		IMP	

Signature *W. J. Bee*

Date 12/27/99

KOOGLER & ASSOCIATES, ENVIRONMENTAL SERVICES
 ANNUAL THERMOCOUPLE CALIBRATION 12/27/99

THERMOCOUPLE #	ICE (F)	ASTM (F)	AMB. (F)	ASTM (F)	212 (F)	ASTM (F)	400 (F)	ASTM (F)	THERMOCOUPLE #
KA-06	33	33	73	74	212	212	420	419	KA-06
KA-07	33	32	74	75	209	210	421	422	KA-07
KA-08	34	33	74	74	211	211	415	416	KA-08
KA-09	33	33	74	74	215	216	416	417	KA-09
KA-10	34	33	72	72	214	215	408	407	KA-10
KA-11	33	33	72	72	212	212	415	414	KA-11
KA-12	33	33	73	72	219	220	408	407	KA-12
KA-38	34	33	73	74	211	211	412	411	KA-38
KA-39	34	33	73	73	212	211	416	415	KA-39
KA-50	33	34	74	73	215	214	415	416	KA-50
KA-64	33	33	74	74	211	211	410	411	KA-64
KA-70	33	33	73	74	212	213	405	406	KA-70
KA-71	34	34	73	73	211	210	407	408	KA-71
KA-72	34	33	72	72	216	215	410	410	KA-72
KA-105	34	33	73	73	217	218	404	405	KA-105
KA-108	34	34	72	73	214	215	412	411	KA-108
KA-115	34	33	72	72	213	214	409	410	KA-115
KA-126	34	33	72	72	216	216	410	409	KA-126

THERMOCOUPLE #	ICE (F)	ASTM (F)	AMB. (F)	ASTM (F)	212 (F)	ASTM (F)	400 (F)	ASTM (F)	THERMOCOUPLE #
KAK-08	32	32	73	74	218	217	407	406	KAK-08
KAK-09	31	31	73	73	211	212	405	406	KAK-09
KAK-10	32	32	74	74	209	210	377	376	KAK-10
KAK-11	31	31	75	75	206	206	399	398	KAK-11
KAK-12	32	31	74	74	218	217	407	406	KAK-12
KAK-38	31	31	74	74	210	211	410	410	KAK-38
KAK-65	32	32	74	74	205	205	377	377	KAK-65
KAK-72	31	31	74	75	208	208	400	401	KAK-72
KAK-110	31	32	75	74	209	210	399	400	KAK-110
KAK-07	32	31	75	74	209	210	389	390	KAK-07

VOST SWITCH BOX	T. COUPLE				
CH#1	C-1	32	33	74	75
CH#2	C-1	33	32	74	74
CH#3	C-1	33	33	75	74

VOST SWITCH BOX					
CH#1	C-2	32	33	73	74
CH#2	C-2	33	33	74	75
CH#3	C-2	32	33	75	75

Signature Steph J. Bee

Date 12/27/99

KOOGLER & ASSOCIATES, ENVIRONMENTAL SERVICES
 ANNUAL THERMOCOUPLE CALIBRATION 12/27/99

Range (μ C)	Measured Voltage (mV)	Measured Voltage (V)	Calc. Temp. (μ C)	Readout Temp. (μ C)	Percent Difference (%)
KAK-12	28.7	0.029	690	693	-0.45023
	37.4	0.037	902	900	0.217654
KAK-38	28.9	0.029	694	698	-0.51192
	37.2	0.037	897	900	-0.33898
KAK-72	28.5	0.029	685	687	-0.30387
	37.5	0.038	904	908	-0.39058
KAK-65	28.2	0.028	678	680	-0.32666
	37.8	0.038	912	910	0.218082
KA-110	29	0.029	694	699	-0.65592
	37	0.037	894	899	-0.50758

EQUATIONS :

$$T(\text{calc.}) = (0.226584602 + (24152.109 * V) + (67233.4248 * V^2) + (2210340.682 * V^3) - (860963914.9 * V^4) + (48350600000 * V^5) - (1184520000000 * V^6) + (13869000000000 * V^7) - (63370800000000 * V^8))$$

Where :

V = Measured Voltage (Volts)

T(calc.) = Temperature calculated based on voltage

Signature Steph S. Bee

Date 12/27/99

POST-TEST DRY GAS METER CALIBRATION FORM

COMPANY: Florida Rock Industries
 SOURCE: Cement Kiln
 DATE: August 9, 2000
 PRETEST Y: 0.997
 TEST METER NUMBER: KA-1
 METER BOX NUMBER: KA-4
 BAROMETRIC PRESSURE (Pb): 30.01
 DELTA H (dH): 2

	TEST METER READING (ft ³)	DRY GAS READING (ft ³)	TIME (min) ±	VACUUM SETTING (in. Hg)
INITIAL	304.563	321.225		
FIRST	310.023	326.635	6.1	6
SECOND	319.263	335.835	10.3	6
THIRD	328.421	345.017	10.2	6

DELTA H	TEST METER Vt (ft ³)	DRY GAS Vd (ft ³)	TEST METER TEMP. Tt (F)	DRY GAS TEMP. Td (F)
2	5.460	5.410	77.5	81.5
PB	9.240	9.200	77.5	84.5
30.01	9.158	9.182	77	87

	Yi	Yi
		$Vd * (Pb + dH / 13.6) * (Tt + 460)$
		$Vt * Pb * (Td + 460)$
RUN 1 (Yi)=	1.011794	88727.26 / 87692.95
RUN 2 (Yi)=	1.012466	150985.7 / 149126.6
RUN 3 (Yi)=	1.011005	150332.8 / 148696.4
AVG. Y =	1.011755	

PRETEST Y = 0.997
 AVG. DELTA Y = 0.014755
 DELTA Y LIMIT = 0.05
 IS TEST WITHIN 5%? YES

- Vt = Gas volume passing through the test meter, ft³
- Vd = Gas volume passing through the dry gas meter, ft³
- Tt = Temperature of the gas in the test meter, |F
- Tdi = Temperature of the inlet gas of the dry gas meter, |F
- Tdo = Temperature of the outlet gas of the dry gas meter, |F
- Td = Average temperature of the gas in the dry gas meter, the average of Tdi and Tdo, |F
- dH = Pressure difference accross the orifice, in, H2O
- Yi = Ratio of test meter to dry gas meter for each run
- Y = Average ratio of accuracy of test meter to dry gas meter for all three runs, tolerance = pretest * 0.05*Y
- ± = Time of calibration run, min
- Pb = Barometric pressure, in Hg.

DRY GAS METER AND ORIFICE CALIBRATION

CONTROL BOX NO. KA-4 BAROMETRIC PRESS. 30.39 IN. HG.
 DATE FEB. 22, 2000 PERFORMED BY ROC

	RUN 1	RUN 2	RUN 3	RUN 4	RUN 5
VACUUM ("Hg)	0.0	0.0	0.0	0.0	0.0
dHw ("H2O)	-0.28	-0.30	-0.33	-0.37	-0.43
dHd ("H2O)	0.50	1.00	1.50	2.50	3.50
INITIAL WTM	3.036	28.727	994.704	20.046	9.754
FINAL WTM	9.754	34.540	1003.036	28.727	20.046
INITIAL DGM	103.007	129.171	94.618	120.249	109.760
FINAL DGM	109.760	135.141	103.007	129.171	120.249
TEMP. WTM (F)	68.00	69.00	68.00	69.00	68.00
TEMP. DGM (F)	76.00	80.00	75.00	80.00	78.00
TEST TIME (MIN.)	14.50	9.00	11.00	9.00	9.00

NET VOLUME WTM	6.718	5.813	8.332	8.681	10.292
NET VOLUME DGM	6.753	5.970	8.389	8.922	10.489
Y	1.009	0.992	1.004	0.988	0.992
dH _θ	1.264	1.296	1.421	1.453	1.447

AVERAGE Y = 0.997
 ACCEPTABLE Y RANGE = 0.980 TO 1.020 OK
 AVERAGE dH_θ = 1.376

$$Y = \frac{V_w (P_b - (dH_w / 13.6)) \times (T_d + 460)}{(T_w + 460)} \div \frac{V_d (P_b + (dH_d / 13.6)) \times (T_d + 460)}{(T_w + 460)}$$

$$dH_{\theta} = 0.0317 \times dH_d / (P_b (T_d + 460)) \times ((T_w + 460) \times \text{time}) / V_w^2$$

PROJECT PARTICIPANTS

PROJECT PARTICIPANTS

KOOGLER & ASSOCIATES

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

Project Advisor

Stephen S. Bell

Field Test Crew

Glen A. Haven

Field Test Crew

FLORIDA ROCK INDUSTRIES, INC.

George Townsend

Environmental & Safety Manager



**STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

ALACHUA COUNTY,

Petitioner,

v.

Case No.:
FDEP File Nos. 0010087-003-AC/PSD-FL-228-A
and 0010087-002-AV

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

and

FLORIDA ROCK INDUSTRIES, INC.,

Respondents.

_____ /

**NOTICE OF VOLUNTARY DISMISSAL
OF ALACHUA COUNTY'S PETITION FOR FORMAL ADMINISTRATIVE HEARING**

Petitioner, Alachua County ("County"), hereby gives notice of voluntarily dismissing, without prejudice, its Petition for Formal Administrative Hearing ("Petition") in the above-styled matter, and states the following:

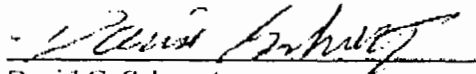
1. On March 1, 2001, the County timely filed its Petition.
2. By telephone conversation between the undersigned and Douglas Beason, Esquire, on June 12, 2001, the State of Florida Department of Environmental Protection ("Department") informed the County that additional changes to the subject draft permits had been finally agreed upon by the Department and Florida Rock Industries, Inc.
3. By copies of letters dated June 8 and July 2, 2001, from Clair Fancy to John Baker, and June 12 and July 3, 2001, from Christopher Kirts to John Baker, the Department represented to the County that the final draft permit language agreed upon by the Department and Florida Rock

Industries, Inc. is as set forth in the documents attached to such letters. These letters and attachments are attached hereto and incorporated as Exhibit A.

Based upon the foregoing, the County voluntarily dismisses its Petition, without prejudice, conditioned upon the draft permits becoming final and effective in strict accordance with the terms embodied in Exhibit A. Should any further changes be made to the draft permits, or should the draft permits not become final for any reason, the County reserves the right to refile or reinstate its Petition as to any and all issues in order to protect the County's interests regarding the content of the final permits. Furthermore, the County hereby requests the Department to provide the County with written notice of any further changes to the draft permits, and written notice of any further permit modifications, renewals, or new permits concerning the subject cement plant.

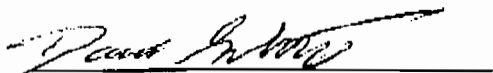
Respectfully submitted this 25th day of July, 2001.

ALACHUA COUNTY ATTORNEY'S OFFICE



David C. Schwartz
Assistant County Attorney
Florida Bar No. 749079
Alachua County Attorney's Office
Post Office Box 2877
Gainesville, FL 32602-2877
(352) 374-5218

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. Mail to Douglas Beason, Esquire, State of Florida Department of Environmental Protection, Office of General Counsel, 3900 Commonwealth Blvd., MS 35, Tallahassee, Florida 32399-3900 and Segundo Fernandez, Esquire, Oertel, Hoffman, Fernandez & Cole, P.A., 301 South Bronough Street, Suite 500, Tallahassee, Florida 32301 on this 25th day of July, 2001.



David C. Schwartz
Assistant County Attorney

RECEIVED

SEP 11 2000

BUREAU OF AIR REGULATION

To: Al Linero
From: Mort Benjamin
Date: September 7, 2000
Subj.: Acid Mist and Beryllium Tests from Florida Rock Cement Plant

I am sending you a copy of the test report from Florida Rock in Newberry. The results from the sulfuric acid mist and beryllium are guides to permit limits.

The tests are reported as pounds emitted per hour. The kiln feed rate is reported as well. I have calculated the emission rates to pounds of pollutant per ton of clinker:

$$\text{Feed Rate Actual/Feed Rate permit} \times \text{Clinker Rate permit} = \text{tons/hr clinker}$$

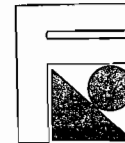
$$\text{Pounds emitted per hour/ tons per hour clinker} = \text{pounds/ton clinker}$$

Sulfuric Acid Mist

Feed Rate Tons/hr	Ratio	Clinker Rate Tons/hr	Emissions lbs/hr	lbs/ton
139.8	$139.8/149.9$ $\times 95.8$	89.34	0.0003	$3.36 \text{ e-}6$

Beryllium

138.3	$138.3/149.9$ $\times 95.8$	88.38	0.06	$6.79 \text{ e-}4$
-------	--------------------------------	-------	------	--------------------



July 25, 2000

RECEIVED

JUL 26 2000

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.

Mr. Al Linero
July 25, 2000
Page 2 of 2

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.

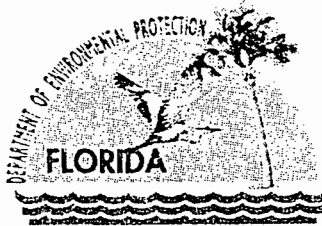
Best regards,



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



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

July 18, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

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

Dear Mr. Baker:

The Department reviewed your request dated July 17, 2000 to further extend the expiration date of the construction permit. Per Rule 62-4.080, F.A.C., an extension for a construction permit shall be granted if the applicant can demonstrate reasonable assurances that upon completion, the extended permit will comply with the standards and conditions required by applicable regulation.

We already have fairly extensive information about the facility and the control equipment. We understand that compliance testing is underway. To complete the reasonable assurance requirement allowing extension of the permit, please submit the following information:

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.
2. Identify additional production and emission testing that needs to be conducted and provide estimated dates for completion of those tasks.
3. Provide a statement (and basis for believing) that the facility will comply with applicable regulation.

If you have any questions regarding this matter, please call me at 850/921-9523 or Teresa Heron at 850/921-9529.

Sincerely,

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

Cc: Fred Cohrs, FRI
Cary Cohrs, FRI
John Koogler, P.E.
Chris Kirts, DEP NED

"More Protection, Less Process"

Printed on recycled paper.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr John D Baker
 President
 Florida Rock Industries Inc
 155 E 21 St
 Jacksonville FL 32206

2. Article Number (Copy from service label)
 Z 341 355 336

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

7/19/80

C. Signature Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Z 341 355 336

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	
John D Baker, Pres.	
Street & Number	
155 E 21 St	
Post Office, State, & ZIP Code	
JAX FL 32206	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
Fl. Rock - Cement Plant 7/11/80 Newberry	

PS Form 3800, April 1995

LAW OFFICES

OERTEL, HOFFMAN, FERNANDEZ & COLE, P.A.

301 SOUTH BRONOUGH STREET
SUITE 500
TALLAHASSEE, FLORIDA 32301

(850) 521-0700
FAX (850) 521-0720

MAILING ADDRESS:

POST OFFICE BOX 1110
TALLAHASSEE, FLORIDA 32302-1110

<http://www.ohfc.com>

TIMOTHY P. ATKINSON
JEFFREY BROWN
M. CHRISTOPHER BRYANT
C. ANTHONY CLEVELAND
TERRY COLE
SEGUNDO J. FERNANDEZ
SCOTT W. FOLTZ
KENNETH F. HOFFMAN
CHRISTOPHER D. JOHNSTON
KENNETH G. OERTEL
PATRICIA A. RENOVITCH

RECEIVED

JUL 17 2000

BUREAU OF AIR REGULATION

July 17, 2000

Via Hand Delivery

Mr. Howard C. Rhodes, Director
Division of Air Resources Management
Department of Environmental Protection
111 S. Magnolia Drive, Suite 4
Tallahassee, Florida 32301

Re: FDEP Air Construction Permit No. AC01-267311 / PSD-FL-288
Facility No.: 0010087

Dear Mr. Rhodes:

We represent Florida Rock Industries, Inc. with respect to its Thompson S. Baker Cement Plant in Newberry, Florida. We understand that the current permit extension will expire on July 30, 2000. We hereby request an extension of the above-referenced permit for a further six month (6-month) period. This extension is required in order to complete production testing and operational fine-tuning, complete physical construction and equipment installation, and to complete all air emissions testing required by the FDEP permit.

The construction permit required the company to apply for its Operation/Title V Permit by a time certain, prior to expiration of the construction permit. That permit application was submitted on October 1, 1999, and final processing is pending submittal of the air emissions testing. We anticipate that the extension being requested will allow for the final processing of the Title V Permit Application during the pendency of the construction permit extension.

Mr. Howard C. Rhodes, Director
Division of Air Resources Management
July 17, 2000
Page 2

We therefore request an extension of FDEP Permit No. AC01-267311/PSD-FL-228 for a further six month period from July 30, 2000 to January 31, 2001. We have enclosed the processing fee of \$50.00 pursuant to Rule 62-4.050(4)(r)3., Florida Administrative Code.

Please feel free to call us if you have any questions.

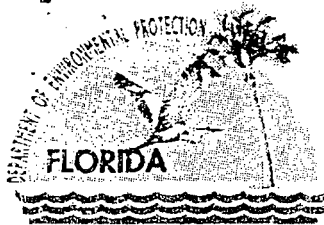
Sincerely,



Segundo J. Fernandez
Timothy P. Atkinson

Enclosure

c: John Baker
Fred Cohrs
Cary Cohrs
John B. Koogler
Steve Cullen
Al Linero
Doug Beason
Chris Kirts
Larry Morgan



Department of Environmental Protection

Jeb Bush
Governor

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

David B. Struhs
Secretary

July 13, 2000

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

RE: DEP File No. AC01-267311 and 0010087-003-AC
PSD-FL-228 – Facility ID. No. 0010087
Cement Plant – Newberry, Alachua County, Florida

Dear Mr. Baker:

The Department reviewed your request dated June 16, 2000 to amend the above reference construction permit by adding EPA Test Method 25A for the measuring of volatile organic compound emissions (VOCs). The Department concurs with your request and modifies Specific Condition No. 6 as follows:

SPECIFIC CONDITION NO. 6

[TEXT OMITTED FOR CLARITY]

Performance tests shall begin within 60 days after achieving and maintaining the permitted production rate, but not later than 180 days after initial operation at that rate, using the following EPA reference methods:

Method 5	Determination of Particulate Matter Emissions from Stationary Sources
Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources
Method 10	Determination of Carbon Monoxide Emissions from Stationary Sources
Method 22	Visual Determination of Fugitive Emissions from Material Sources
Method 25 <u>or</u> <u>25A</u>	Determination of Volatile Organic Compound Emissions from Stationary Sources
Method 104	Determination of Beryllium Emissions from Stationary Sources (40 CFR 61, Appendix B)

[TEXT OMITTED FOR CLARITY]

A copy of this letter shall be filed with the referenced permit and shall become part of the permit. This permitting decision is issued pursuant to Chapter 403, Florida Statutes.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A

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Printed on recycled paper.

petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any

Mr. John D. Baker

Page 3

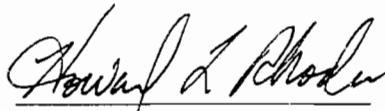
July 13, 2000

such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources Management


CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 7/17/00 to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Gregg Worley, EPA
John Bunyak, NPS
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
Chair Alachua County Commission
Chris Bird, Alachua County EPD
Arthur Saarinen

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.


(Clerk)

7/17/00
(Date)

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John D. Baker, President
 Florida Rock Industries, Inc.
 155 East 21 Street
 Jacksonville, Florida 32206

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery
 F/21/00

C. Signature
 X *M. P. Gross* Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label)

2 341 355 337

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

Z 341 355 337

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	<i>John Baker, Pres.</i>
Street & Number	<i>155 E 21 St.</i>
Post Office, State, & ZIP Code	<i>Jacksonville, FL 32206</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	<i>Fl. Rock Industries 7/18/00</i>

PS Form 3800, April 1995



KOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

MEMORANDUM

TO: Patty Adams

FROM: Wendy Auerbach

DATE: July 10, 2000

SUBJECT: Florida Rock Industries
Thompson S. Baker Portland Cement Plant
Newberry, Alachua County, Florida
Permit No. AC01-267311/PSD-FL-228

RECEIVED

JUL 11 2000

BUREAU OF AIR REGULATION

Pursuant to our conversation on Friday, July 7, 2000, enclosed is another check for \$250 – fee for minor amendment to the subject construction permit. If the original check ever arrives, please let me know.

Thank you for all of your assistance.

cc: J. Nelson



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

PROJECT _____

FAX TRANSMITTAL FORM

TO: Patty Adams

FAX NO. _____
FROM: Wendy
DATE: 7/10/00 SENT BY: _____

The text being transmitted consists of 2 page(s) PLUS this one. If you do not receive all of the pages or if there are difficulties with this transmission, please call (352) 377-5822.


REMARKS: Sent today via Priority Mail

This message is intended for use only by the individual to whom it has been addressed and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at (352) 377-5822 so that we may prevent any recurrence. Thank you.

07/10/00 15:27 3352 377 7158

KOOGLER ASSOC *** FDR TALL

003/003

JOHN B KOGLER, PA DBA KOGLER & ASSOCIATES PH 352 377-5822 4014 NW 13TH ST GAINESVILLE, FL 32609		1282
		83-139/831 BRANCH 004
PAY TO THE ORDER OF <u>Florida Dept of Environmental Protection</u>		DATE <u>7/10/2000</u>
<u>two hundred fifty dollars</u>		\$ <u>250.00</u>
		DOLLARS <input type="checkbox"/> <small>Payable to order of cash</small>
 FIRST NATIONAL BANK OF ALACHUA	MILLHOPPER OFFICE 4040 N.W. 18TH BLVD. GAINESVILLE, FL 32608	
FOR <u>FL ROLK, NEWBERRY ACOI-267311/P50-FL-228</u>		



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

PROJECT 187-00-09

FAX TRANSMITTAL FORM

TO: Patty Adams
FDER - Tallahassee
COPY TO TERESA

FAX NO. _____
FROM: Pradeep Kaval
DATE: 6-28-00 SENT BY: [Signature]

The text being transmitted consists of 2 page(s) PLUS this one. If you do not receive all of the pages or if there are difficulties with this transmission, please call (352) 377-5822.

REMARKS: F.Y.I. We don't know why
the money has not made it there yet.

Regards,
[Signature]

This message is intended for use only by the individual to whom it has been addressed and may contain confidential or privileged information. If you are not the intended recipient, please note that the use, copying or distribution of this information is not permitted. If you have received this FAX in error, please destroy the original and notify the sender immediately at (352) 377-5822 so that we may prevent any recurrence. Thank you.



KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES

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

MEMORANDUM

TO: Patty Adams

FROM: Wendy Auerbach

DATE: June 19, 2000

SUBJECT: Florida Rock Industries
Thompson S. Baker Portland Cement Plant
Newberry, Alachua County, Florida
Permit NO. AC01-267311/PSD-FL-228

In accordance with Pradeep Raval's telephone conversation today with Joe Kahn, enclosed is a check for \$250; the fee required for the minor amendment requested to the subject construction permit.

If you have any questions, please do not hesitate to contact me.

08/28/00 10:33 3352 377 7158 KOOGLER ASSOC +++ FDER TALL 003/003

1274


JOHN B KOOGLER, PA
DBA KOOGLER & ASSOCIATES
 PH 352 377-5822
 4014 NW 13TH ST
 GAINESVILLE, FL 32609

63-138/831
BRANCH 004

DATE 6/19/2000

PAY TO THE ORDER OF Florida Dept of Environmental Protection \$ 250.⁰⁰

two hundred fifty dollars DOLLARS

 **FIRST NATIONAL BANK OF ALACHUA**
 MILLHOPPER OFFICE
 4040 N.W. 15TH BLVD.
 GAINESVILLE, FL 32605

FOR _____

[Signature]

© 1999 FIRST NATIONAL BANK OF ALACHUA



KOOGLER & ASSOCIATES

ENVIRONMENTAL SERVICES

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

KA 187-00-09

June 16, 2000

RECEIVED

JUN 19 2000

BUREAU OF AIR REGULATION

VIA FAX AND MAIL

Mr. Joe Kahn
Florida Department of
Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Subject: Florida Rock Industries, Inc.
Thompson S. Baker Portland Cement Plant
Newberry, Alachua County, Florida
Permit No. AC01-267311/PSD-FL-228

Dear Joe:

As discussed during our recent telephone conversation, I would like to request a minor amendment to the subject air construction permit changing the test method for volatile organic compound emissions. The subject permit, at Specific Condition 6, presently specifies that the volatile organic compound (VOC) emissions will be determined in accordance with EPA Method 25 (40 CFR 60, Appendix A). I am requesting that the test method be changed to EPA Method 25 or 25A (40 CFR 60, Appendix A); Method 25A is an instrumental method using a flame ionization detector (FID).

The request to use Method 25A for VOC emission measurements is consistent with the requirement of Permit 1210465-001-AC/PSD-FL-259 recently issued to the Suwannee American Cement Company (Specific Condition 22) and the MACT requirement to use a FID-type continuous emission monitor to measure VOC emissions is Greenfield Portland cement plants.

I would appreciate it if you could expedite this request as compliance testing at the plant is scheduled to begin during the week of June 26, 2000. The VOC emission measurement portion of the compliance testing is scheduled for the first week of July 2000.

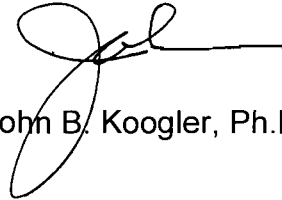
Mr. Joe Kahn
Florida Department of
Environmental Protection

June 16, 2000
Page 2

I appreciate your prompt attention to this matter. If you have any questions or need further details, please do not hesitate to contact me at 352-377-5822.

Very truly yours,

KOOGLER & ASSOCIATES

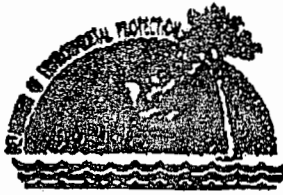


John B. Koogler, Ph.D., P.E.

JBK:wa

c: Mr. Fred Cohrs, FRI
Mr. Cary Cohrs, FRI
Mr. George Townsend, FRI





Jeb Bush
Governor

Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Strubs
Secretary

May 23, 2000

CERTIFIED - RETURN RECEIPT

Mr. James J. Konish
FALR, Inc.
Post Office Box 385
Gainesville, Florida 32602

Postmark	Date	# of pages
Fax Note #17077	5/23/00	6
To	J. Konish	
Fax #	(352) 371-9061	
From	Chris Kirts	
Phone #	904-448-4310	

Dear Mr. Konish,

Florida Rock - Newberry Cement Plant
Alachua County - Air Program
Public Records Request

This is in response to your letter of May 2 (received by this office May 19), requesting certain public records.

There have been no test reports submitted by Florida Rock to date concerning the Newberry Cement Plant.

On May 22, we discussed information and documents, in the possession of Northeast District (NED) that could be copied and sent to you. You advised that you already had copies of the Title V permit application, NED's November 22, 1999 "Request for Additional Information", and the facilities response.

All requested information is attached with the exception of correspondence concerning the effective Air Construction Permit. The Office of General Council has advised this office not to include that information, as it concerns a matter under litigation.

Please continue to address all similar requests to Mr. Doug Beason's office:

Mr. Doug Beason
Department of Environmental Protection
Office of General Council
3900 Commonwealth Ave.
Tallahassee, FL 32399-3000

Sincerely,

Christopher L. Kirts, P.E.
Air Program Administrator

"More Protection, Less Process"

Printed on recycled paper.

Composite II-6

James J. Konish, Attorney At Law
Post Office Box 385
Gainesville, FL 32602
Phone: (352) 375-8036 Fax: (352) 371-9061
E-Mail: FALR@FAIR.com

May 2, 2000

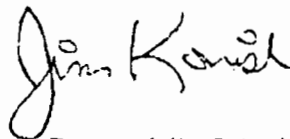
Doug Beason
Office of General Counsel (OGC)
Dept. of Environmental Protection (DEP)

VIA
Certified Mail Receipt/
Return Service Requested

§119 PUBLIC RECORDS REQUEST

Pursuant to §119, Fla. Stat., I, Jim Konish, attorney for FPLW, Inc., respectfully request the following:

1. All emission test reports of any kind pertinent to the Newberry, Florida - Florida Rock Cement Kiln.
2. All correspondence of any kind between DEP and Florida Rock pertinent to either the DEP Air Construction or Air Operating Permit applications for the Newberry, Florida - Florida Rock Cement Kiln, since January 1, 1999.
3. The draft Air Operating Permit for the Newberry, Florida - Florida Rock Cement Kiln, if issued, and any correspondence, of any kind, between DEP and Florida Rock pertinent to the same.



Respectfully Submitted By:
Jim Konish
Attorney for FPLW, Inc.
Post Office Box 385
Gainesville, FL 32602
(352) 375-8036

Composite II-a.

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA PROFESSIONAL LICENSE WATCH
(FPLW), INC.,

Petitioner,

vs.

OGC File No. 99-1804

FLORIDA ROCK INDUSTRIES, INC.
and STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondents.

FLORIDA CHAPTER OF THE
SIERRA CLUB, INC.,

Petitioner,

vs.

OGC File No. 99-2052

FLORIDA ROCK INDUSTRIES, INC.
and STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION,

Respondents.

ORDER CONSOLIDATING CASES AND ESTABLISHING INFORMAL PROCEEDING

On November 24, 1999, the Department of Environmental Protection (the Department) received a First Amended Petition for Informal Administrative Hearing from Florida Professional License Watch (FPLW), Inc., and a Petition for Informal Administrative Hearing from Florida Chapter of the Sierra Club, Inc. Both Petitions challenge the Department's grant of an extension of time for the Air Construction Permit previously issued to Florida Rock Industries, Inc. (Florida Rock), DEP File Number AC01-267311, PSD-FL-228, Facility I.D. Number 0010087. On December 13, 1999, the Department received Respondent Florida Rock's Motion to Dismiss Petition of Florida Chapter of the Sierra Club, Inc.

Pursuant to Section 120.57(2), Florida Statutes, and Rule 28-106.301 through 28-106.307, Florida Administrative Code (F.A.C.), I hereby establish the following procedure for an informal proceeding to consider and determine the relevant issues of law raised by the Petitioners in relation to the granting of the extension to the Respondents.

1. The above cases are hereby consolidated for purposes of this proceeding.

2. I appoint Kirby B. Green, III, Deputy Secretary, as the Hearing Officer in this proceeding. Mr. Green's mailing address is Department of Environmental Protection, Office of the Secretary, Mail Station 15, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000.

3. An informal hearing will be scheduled by Mr. Green after consulting with the parties. The hearing will be conducted at a time and place to be announced. The purpose of the informal hearing is to allow the parties the opportunity to present argument regarding the Department's extension of time on the referenced Air Construction Permit.

4. At the informal hearing, the Hearing Officer may, if necessary:

- (a) administer oaths and affirmations;
- (b) rule upon offers of proof and receive relevant evidence, assuming there is no disputed issue of material fact;
- (c) regulate the course of the hearing;
- (d) enter any order to carry out the purposes of Chapter 120 of the Florida Statutes and governing procedural rules;
- (e) make and receive offers of settlement, stipulation and adjustment; and

(f) determine whether there are any disputed issues of material fact such that the matter should be referred to the Division of Administrative Hearings for the assignment of an administrative law judge to conduct a formal hearing.

5. The parties shall arrange to have all witnesses and evidence present at the time and place of hearing, if any. Any party to this proceeding has the right, at his, her or its own expense, to be accompanied, represented and advised by counsel. A party's failure to appear at the scheduled hearing may be grounds for the entry of an order of dismissal.

6. The Petitioners shall file and serve on counsel of record written memoranda of law in support of their positions no later than thirty (30) days from the date of this Order. The memoranda of law shall contain all argument in support of the Petitioners' positions. The memorandum of Florida Chapter of the Sierra Club, Inc. shall also specifically address the issues raised in Florida Rock's Motion to Dismiss. Failure to file the memoranda of law may be grounds for entry of an order of dismissal. The memoranda shall be accompanied by a separate, short and concise statement of the material facts upon which Petitioners rely as grounds for their requested relief.

7. The Department and Florida Rock may file written responses to the memoranda of law submitted by the Petitioners no later than fifteen (15) days after Petitioners' memoranda are served on Respondents. If any fact identified by the Petitioners is disputed or is not deemed material, the Department or Florida Rock shall so state. Both Respondents shall also, in a separate document, concisely identify any additional material facts they deem relevant to the issues. If Petitioners controvert any additional fact identified by Respondents, they shall file a statement identifying such facts within ten (10) days of service of Respondents' statement.

8. After receipt of the memoranda and statements of fact, the Hearing Officer may dispense with oral argument if he does not deem it likely to be helpful to his deliberations.

9. A copy of any statement, pleading or other paper filed with the Hearing Officer by any party to this proceeding shall be served on each party. Service shall be made upon the party or his, her or its representative by delivering a copy or by mailing it to the last known address.

10. The Hearing Officer shall issue a Final Order in compliance with the requirements of Section 120.569, F.S.

11. If during the course of this informal proceeding a party timely raises a disputed issue of material fact, the Department will forward this matter to the Division of Administrative Hearings for the assignment of an Administrative Law Judge to conduct a formal hearing.

12. Pursuant to Section 120.60, F.S., and/or Rule 62-4.080(3), F.A.C., Florida Rock's permit referenced above is extended until the completion of these proceedings.

DONE AND ORDERED this 23rd day of December, 1999.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Kirby B. Green, III
Kirby B. Green, III
Deputy Secretary

Douglas Building, MS 15
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314

FILING AND ACKNOWLEDGMENT:

FILED, on this date, pursuant to Section 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Heather Chapman
Clerk

12/23/99
Date

CERTIFICATE OF SERVICE

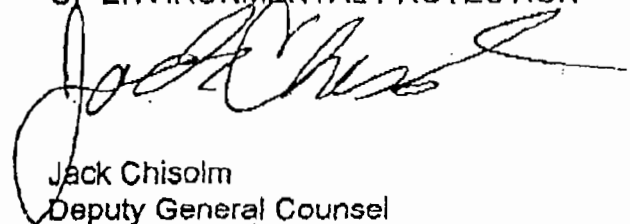
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to:

James J. Konish
President, FPLW, Inc.
Post Office Box 2309
Gainesville, Florida 32602-2309

Segundo J. Fernandez, Esq.
Oertel, Hoffman, Fernandez & Cole, P.A.
Post Office Box 6507
Tallahassee, Florida 32314-6507

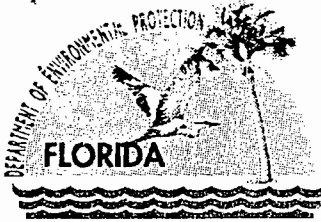
On this 03 day of December, 1999.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Jack Chisolm
Deputy General Counsel
Florida Bar No. 273473

3900 Commonwealth Boulevard
Mail Station 35
Tallahassee, FL 32399-3000
Telephone: (850) 488-9314



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

October 6, 1999

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John D. Baker, President
Florida Rock Industries, Inc.
155 East 21st Street
Jacksonville, Florida 32206

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

Dear Mr. Baker:

The Department reviewed your request dated September 17, 1999 to extend the expiration date of the construction permit. The expiration date is hereby extended from December 31, 1999 to July 30, 2000 to allow completion of physical construction. Per the construction permit, compliance testing must be conducted no later than 180 days from startup. Any additional time to accommodate testing can be incorporated into the Title V permit, for which you have already applied.

A copy of this letter shall be filed with the referenced permit and shall become part of the permit.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542 F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. The petition must specify the following information: (a) The name, address, and telephone number of the petitioner; (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any; (c) Each rule or portion of a rule from which a variance or waiver is requested; (d) The citation to the statute underlying (implemented by) the rule identified in (c) above; (e) The type of action requested; (f) The specific facts that would justify a variance or waiver for the petitioner; (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2) F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of the EPA and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

This permitting decision is final and effective on the date filed with the clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this order will not be effective until further order of the Department.

Any party to this permitting decision (order) has the right to seek judicial review of it under section 120.68 of the Florida Statutes, by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida.



Howard L. Rhodes, Director
Division of Air Resources
Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this order was sent by certified mail (*) and copies were mailed by U.S. Mail before the close of business on 10-6-99 to the person(s) listed:

John D. Baker, FRI*
Fred W. Cohrs, FRI
Gregg Worley, EPA
John Bunyak, NPS
Chris Kirts, DEP NED
Pat Reynolds, DEP Gainesville
Chair Alachua County Commission
Chris Bird, Alachua County EPD
Arthur Saarinen

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to §120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Keri Joben
(Clerk)

10-6-99
(Date)

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address.
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 John D. Baker, Pres
 Fla. Rock Ind
 155 E. 21st St.
 Jacksonville, FL
 32206

4a. Article Number
 2031 392 012

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery

5. Received By: (Print Name)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 [Signature]

Thank you for using Return Receipt Service.

PS Form 3811, December 1994

102595-98-B-0229

Domestic Return Receipt

Z 031 392 012

US Postal Service
Receipt for Certified Mail

No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to John Baker	
Street & Number Fla Rock	
Post Office, State, & ZIP Code Fl	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	Extension
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	10-6-99
PSD-FI-228 0010087	

PS Form 3800, April 1995



Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR AIR PERMIT - TITLE V SOURCE

See Instructions for Form No. 62-210.900(1)

RECEIVED

I. APPLICATION INFORMATION

OCT 1 - 1999

Identification of Facility

1. Facility Owner/Company Name: FLORIDA ROCK INDUSTRIES, INC.	
2. Site Name: NEWBERRY CEMENT PLANT	
3. Facility Identification Number: 0010087 <input type="checkbox"/> Unknown	
4. Facility Location: Street Address or Other Locator: CR 235 2.5 MI. NE OF NEWBERRY City: NEWBERRY County: ALACHUA Zip Code:	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

STATE OF FLORIDA
DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT - JAX

Application Contact

1. Name and Title of Application Contact: Steven C. Cullen, PE	
2. Application Contact Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th ST City: Gainesville State: Florida Zip Code: 32609	
3. Application Contact Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	
3. PSD Number (if applicable):	
4. Siting Number (if applicable):	

RECEIVED
OCT 27 1999
BUREAU OF AIR REGULATION

Purpose of Application

Air Operation Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Initial Title V air operation permit for an existing facility which is classified as a Title V source.
- Initial Title V air operation permit for a facility which, upon start up of one or more newly constructed or modified emissions units addressed in this application, would become classified as a Title V source.

Current construction permit number: AC01-267311

- Title V air operation permit revision to address one or more newly constructed or modified emissions units addressed in this application.

Current construction permit number: _____

Operation permit number to be revised: _____

- Title V air operation permit revision or administrative correction to address one or more proposed new or modified emissions units and to be processed concurrently with the air construction permit application. (Also check Air Construction Permit Application below.)

Operation permit number to be revised/corrected: _____

- Title V air operation permit revision for reasons other than construction or modification of an emissions unit. Give reason for the revision; e.g., to comply with a new applicable requirement or to request approval of an "Early Reductions" proposal.

Operation permit number to be revised: _____

Reason for revision: _____

Air Construction Permit Application

This Application for Air Permit is submitted to obtain: (Check one)

- Air construction permit to construct or modify one or more emissions units.
- Air construction permit to make federally enforceable an assumed restriction on the potential emissions of one or more existing, permitted emissions units.
- Air construction permit for one or more existing, but unpermitted, emissions units.

Owner/Authorized Representative or Responsible Official

1. Name and Title of Owner/Authorized Representative or Responsible Official: FRED W. COHRS – VICE PRESIDENT
2. Owner/Authorized Representative or Responsible Official Mailing Address: Organization/Firm: FLORIDA ROCK INDUSTRIES, INC. Street Address: 155 EAST 21ST STREET City: JACKSONVILLE State: FLORIDA Zip Code: 32206
3. Owner/Authorized Representative or Responsible Official Telephone Numbers: Telephone: (904) 355-1781 Fax: (904) 355-0817
4. Owner/Authorized Representative or Responsible Official Statement: <i>I, the undersigned, am the owner or authorized representative*(check here [], if so) or the responsible official (check here [X], if so) of the Title V source addressed in this application, whichever is applicable. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i> _____ <i>Fred W. Cohrs</i> Signature _____ <i>10-1-99</i> Date

* Attach letter of authorization if not currently on file.

Professional Engineer Certification

1. Professional Engineer Name: Steven C. Cullen, PE Registration Number: 45188
2. Professional Engineer Mailing Address: Organization/Firm: Koogler & Associates Street Address: 4014 NW 13th STREET City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers: Telephone: (352) 377-5822 Fax: (352) 377-7158

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain a Title V source air operation permit (check here [X], if so), I further certify that each emissions unit described in this Application for Air Permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance schedule is submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

Signature

(seal)



Date

10/1/1999

* Attach any exception to certification statement.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	Raw Material Handling and Storage	AV	0
002	Raw Mill System	AV	0
003	Kiln System	AV	0
004	Clinker Handling	AV	0
005	Finish Grinding Operations	AV	0
006	Cement Handling, Loading, and Bagging	AV	0
007	Coal Handling and Grinding	AV	0

Application Processing Fee

Check one: [] Attached - Amount: \$ _____ [] Not Applicable

Construction/Modification Information

1. Description of Proposed Project or Alterations:

Application for Title V Permit for Portland cement plant.

2. Projected or Actual Date of Commencement of Construction: **December 31, 1996**

3. Projected Date of Completion of Construction: **October 15, 1999**

Application Comment

None

Facility Regulatory Classifications

Check all that apply:

1. <input type="checkbox"/> Small Business Stationary Source?	<input checked="" type="checkbox"/> Unknown
2. <input checked="" type="checkbox"/> Major Source of Pollutants Other than Hazardous Air Pollutants (HAPs)?	
3. <input type="checkbox"/> Synthetic Minor Source of Pollutants Other than HAPs?	
4. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)?	
5. <input type="checkbox"/> Synthetic Minor Source of HAPs?	
6. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS?	
7. <input checked="" type="checkbox"/> One or More Emission Units Subject to NESHAP?	
8. <input type="checkbox"/> Title V Source by EPA Designation?	
9. Facility Regulatory Classifications Comment (limit to 200 characters): None	

List of Applicable Regulations

Title V Core List
NSPS Subparts F, Y, and OOO
NESHAP Subpart LLL

B. FACILITY POLLUTANTS

List of Pollutants Emitted

1. Pollutant Emitted	2. Pollutant Classif.	3. Requested Emissions Cap		4. Basis for Emissions Cap	5. Pollutant Comment
		lb/hour	tons/year		
PM	A	Not Requested	Not Requested	No Basis	None
PM10	A	Not Requested	Not Requested	No Basis	None
SO2	A	Not Requested	Not Requested	No Basis	None
NOx	A	Not Requested	Not Requested	No Basis	None
CO	A	Not Requested	Not Requested	No Basis	None
VOC	B	Not Requested	Not Requested	No Basis	None
SAM	B	Not Requested	Not Requested	No Basis	None
H021	B	Not Requested	Not Requested	No Basis	None
H106	A	Not Requested	Not Requested	No Basis	None
DIOX	B	Not Requested	Not Requested	No Basis	None

C. FACILITY SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
2. Facility Plot Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
3. Process Flow Diagram(s): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
6. Supplemental Information for Construction Permit Application: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Supplemental Requirements Comment: None

Additional Supplemental Requirements for Title V Air Operation Permit Applications

8. List of Proposed Insignificant Activities: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. List of Equipment/Activities Regulated under Title VI: <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Equipment/Activities On site but Not Required to be Individually Listed <input checked="" type="checkbox"/> Not Applicable
10. Alternative Methods of Operation: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
11. Alternative Modes of Operation (Emissions Trading): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Identification of Additional Applicable Requirements: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Risk Management Plan Verification: <input type="checkbox"/> Plan previously submitted to Chemical Emergency Preparedness and Prevention Office (CEPPO). Verification of submittal attached (Document ID: _____) or previously submitted to DEP (Date and DEP Office: _____) <input type="checkbox"/> Plan to be submitted to CEPPO (Date required: _____) <input checked="" type="checkbox"/> Not Applicable
14. Compliance Report and Plan: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Compliance Certification (Hard-copy Required): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 1 of 7 (Raw Material)

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
2. Description of Emissions Unit Addressed in This Section (limit to 60 characters):			
Raw Material Handling and Storage			
4. Emissions Unit Identification Number:		<input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown	
ID: 001			
5. Emissions Unit Status Code: A	6. Initial Startup Date: Projected October 1999	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters) None			

Emissions Unit Information Section 1 of 7 (Raw Material)

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Dust Suppression by water sprays

2. Control Device or Method Code(s): **061**

Emissions Unit Details

1. Package Unit: **Not Applicable**

Manufacturer:

Model Number:

2. Generator Nameplate Rating: **Not Applicable** MW

3. Incinerator Information: **Not Applicable**

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Information Section 1 of 7 (Raw Material)

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: Not Applicable	mmBtu/hr
2. Maximum Incineration Rate: Not Applicable lb/hr	tons/day
3. Maximum Process or Throughput Rate: 1000 TPH	
4. Maximum Production Rate: Not Applicable	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): None	

Emissions Unit Information Section 1 of 7 (Raw Material)

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

NSPS Subpart OOO
NSPS Subpart F

Emissions Unit Information Section 1 of 7 (Raw Material)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? Crusher & Material Storage		2. Emission Point Type Code: 4	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Crusher and conveyors Raw Material Storage			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: None			
5. Discharge Type Code: F	6. Stack Height: Not Applicable feet	7. Exit Diameter: Not Applicable feet	
8. Exit Temperature: 77 °F	9. Actual Volumetric Flow Rate: Not Applicable acfm	10. Water Vapor: Not Applicable %	
11. Maximum Dry Standard Flow Rate: Not Applicable dscfm		12. Nonstack Emission Point Height: 0 feet	
13. Emission Point UTM Coordinates: Not Available within 0.01 Kilometer Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): None			

Emissions Unit Information Section 1 of 7 (Raw Material)

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Raw Material Unloading		
2. Source Classification Code (SCC): 3-05-006-07		3. SCC Units: Tons Unloaded
4. Maximum Hourly Rate: 0	5. Maximum Annual Rate: 0	6. Estimated Annual Activity Factor: 1857120
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 1 of 7 (Raw Material)

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Primary Crushing		
2. Source Classification Code (SCC): 3-05-006-09		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 1000	5. Maximum Annual Rate: 1857120	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 1 of 7 (Raw Material)

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
No Emissions-Limited Pollutants			

Emissions Unit Information Section 1 of 7 (Raw Material)

Pollutant Detail Information Page _____ of _____

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: Not Applicable		2. Total Percent Efficiency of Control: Not Applicable	
3. Potential Emissions: Not Applicable lb/hour		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: Not Applicable Reference:		7. Emissions Method Code: Not Applicable	
8. Calculation of Emissions (limit to 600 characters): Not Applicable			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None			

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code: Not Applicable		2. Future Effective Date of Allowable Emissions: Not Applicable	
3. Requested Allowable Emissions and Units: Not Applicable		4. Equivalent Allowable Emissions: Not Applicable lb/hour tons/year	
5. Method of Compliance (limit to 60 characters): Not Applicable			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): None			

Emissions Unit Information Section 1 of 7 (Raw Material)

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: 10% Exceptional Conditions: 10% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment (limit to 200 characters): 40 CFR 60.62(c) 40 CFR 60.672(b)	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE15	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: 15% Exceptional Conditions: 15% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment (limit to 200 characters): 40 CFR 60.672(c)	

Emissions Unit Information Section 1 of 7 (Raw Material)

**I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)**

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code: Not Subject	2. Pollutant(s): Not Subject
3. CMS Requirement: Not Subject	<input type="checkbox"/> Rule <input type="checkbox"/> Other
4. Monitor Information: Not Subject Manufacturer: Model Number: Serial Number:	
5. Installation Date: Not Subject	6. Performance Specification Test Date: Not Subject
7. Continuous Monitor Comment (limit to 200 characters): None	

Emissions Unit Information Section 1 of 7 (Raw Material)

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
5. Compliance Test Report: Will be submitted in accordance with Rule 62-297, FAC <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: None

Emissions Unit Information Section 1 of 7 (Raw Material)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 2 of 7 (Raw Mill)

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">Raw Mill System</p>			
<p>4. Emissions Unit Identification Number: ID: 002</p> <p style="text-align: right;"><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date: Projected October 1999</p>	<p>7. Emissions Unit Major Group SIC Code: 32</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters) None</p>			

Emissions Unit Information Section 2 of 7 (Raw Mill)

Emissions Unit Control Equipment

3. Control Equipment/Method Description (Limit to 200 characters per device or method):

Fabric Filters – High Temperature
Fabric Filters – Medium Temperature

2. Control Device or Method Code(s): **016, 017**

Emissions Unit Details

1. Package Unit: Not Applicable	
Manufacturer:	Model Number:
2. Generator Nameplate Rating: Not Applicable	MW
3. Incinerator Information: Not Applicable	
Dwell Temperature:	°F
Dwell Time:	seconds
Incinerator Afterburner Temperature:	°F

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-212.400, FAC
NSPS Subpart F
NESHAP Subpart LLL

Emissions Unit Information Section 2 of 7 (Raw Mill)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? E-28, E-29, G-07, H-08		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): E-28: Recycle Dust and Raw Meal to Homogenization Silo E-29: Recycle Dust Airlift G-07: Recycle Dust and Raw Meal to Homogenization Silo H-08: Raw Meal and Recycle Dust to Preheater			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Raw Mill and Air Heater discharge through E-21 of EU 003			
5. Discharge Type Code: V	6. Stack Height: 225 feet	7. Exit Diameter: 2.2 feet	
8. Exit Temperature: 200 °F	9. Actual Volumetric Flow Rate: 15000 acfm	10. Water Vapor: 2%	
11. Maximum Dry Standard Flow Rate: 11800 dscfm		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Available within 0.01 Kilometer Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): G-07 is representative emission point with greatest emission rate.			

Emissions Unit Information Section 2 of 7 (Raw Mill)

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Raw Material Grinding		
2. Source Classification Code (SCC): 3-05-006-13	3. SCC Units: Tons Processed	
4. Maximum Hourly Rate: 212	5. Maximum Annual Rate: 1857120	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use: Distillate Oil: General		
2. Source Classification Code (SCC): 3-90-005-89	3. SCC Units: 1000 Gallons Burned	
4. Maximum Hourly Rate: 0.28	5. Maximum Annual Rate: 2486	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: 0.05	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: 141
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 2 of 7 (Raw Mill)

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	017	None	EL
PM10	017	None	NS
SO2	None	None	EL
NOx	None	None	EL
CO	None	None	EL

Emissions Unit Information Section 2 of 7 (Raw Mill)

Pollutant Detail Information Page 1 of 4

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM		2. Total Percent Efficiency of Control: 99%	
3. Potential Emissions: 2.29 lb/hour 10.0 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.01 gr/dscf Reference: BACT		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 0.01 gr/dscf x 26680 dscfm x 60 min/hr x 1 lb/7000 gr = 2.29 lb/hour @ 8760 hr/yr = 10.0 tons/year			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions: Not Applicable	
3. Requested Allowable Emissions and Units: 0.01 gr/dscf		4. Equivalent Allowable Emissions: 2.29 lb/hour 10.0 tons/year	
5. Method of Compliance (limit to 60 characters): Method 9			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC			

Emissions Unit Information Section 2 of 7 (Raw Mill)

Pollutant Detail Information Page 2 of 4

Potential/Fugitive Emissions

1. Pollutant Emitted: SO2		2. Total Percent Efficiency of Control: Not Applicable	
3. Potential Emissions: 2.02 lb/hour 8.8 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.05 %S Reference: BACT		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 0.05 %S x 280 gal/hr x 7.2 lb/gal x 2 SO2/S = 2.02 lb/hour @ 8760 hr/yr = 8.8 tons/year			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions: Not Applicable	
3. Requested Allowable Emissions and Units: 0.05 %S		4. Equivalent Allowable Emissions: 2.02 lb/hour 8.8 tons/year	
5. Method of Compliance (limit to 60 characters): Fuel Certification by Supplier			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC			

Emissions Unit Information Section 2 of 7 (Raw Mill)

Pollutant Detail Information Page 3 of 4

Potential/Fugitive Emissions

1. Pollutant Emitted: NOx		2. Total Percent Efficiency of Control: Not Applicable	
3. Potential Emissions: 5.60 lb/hour 24.5 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 20 lb/1000 gal Reference: AP-42 Table 1.3-2		7. Emissions Method Code: 4	
8. Calculation of Emissions (limit to 600 characters): 20 lb/1000 gal x 280 gal/hr = 5.60 lb/hour @ 8760 hr/yr = 24.5 tons/year			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None			

Allowable Emissions Allowable Emissions **1** of **1**

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions: Not Applicable	
3. Requested Allowable Emissions and Units: 20 lb/1000 gal		4. Equivalent Allowable Emissions: 5.60 lb/hour 24.5 tons/year	
5. Method of Compliance (limit to 60 characters): CEM – See EU 003			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC			

Emissions Unit Information Section 2 of 7 (Raw Mill)

Pollutant Detail Information Page 4 of 4

Potential/Fugitive Emissions

1. Pollutant Emitted: CO		2. Total Percent Efficiency of Control: Not Applicable	
3. Potential Emissions: 1.40 lb/hour 6.1 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 5 lb/1000 gal Reference: AP-42 Table 1.3-2		7. Emissions Method Code: 4	
8. Calculation of Emissions (limit to 600 characters): 5 lb/1000 gal x 280 gal/hr = 1.40 lb/hour @ 8760 hr/yr = 6.1 tons/year			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions: Not Applicable	
3. Requested Allowable Emissions and Units: 5 lb/1000 gal		4. Equivalent Allowable Emissions: 1.40 lb/hour 6.1 tons/year	
5. Method of Compliance (limit to 60 characters): Method 10			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC			

Emissions Unit Information Section 2 of 7 (Raw Mill)

H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: [X] Rule [] Other
3. Requested Allowable Opacity: Normal Conditions: 5% Exceptional Conditions: 5% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 2 of 7 (Raw Mill)

**I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)**

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code: Not Subject	2. Pollutant(s): Not Subject
3. CMS Requirement: Not Subject	[<input type="checkbox"/>] Rule [<input type="checkbox"/>] Other
4. Monitor Information: Not Subject Manufacturer: Model Number: Serial Number:	
5. Installation Date: Not Subject	6. Performance Specification Test Date: Not Subject
7. Continuous Monitor Comment (limit to 200 characters): None	

Emissions Unit Information Section 2 of 7 (Raw Mill)

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

<p>1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years</p>
<p>2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years</p>
<p>3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years</p>
<p>4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested Will be submitted with compliance test report</p>
<p>5. Compliance Test Report: Will be submitted in accordance with Rule 62-297, FAC <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable</p>
<p>6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>10. Supplemental Requirements Comment: None</p>

Emissions Unit Information Section 2 of 7 (Raw Mill)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 3 of 7 (Kiln System)

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">Kiln System</p>			
<p>4. Emissions Unit Identification Number: ID: 003</p>		<p><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>	
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date: Projected October 1999</p>	<p>7. Emissions Unit Major Group SIC Code: 32</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters) None</p>			

Emissions Unit Information Section 3 of 7 (Kiln System)

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Electrostatic Precipitator – High Efficiency

2. Control Device or Method Code(s): **010**

Emissions Unit Details

1. Package Unit: **Not Applicable**

Manufacturer:

Model Number:

2. Generator Nameplate Rating: **Not Applicable** MW

3. Incinerator Information: **Not Applicable**

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Information Section 3 of 7 (Kiln System)

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-212.400, FAC
NSPS Subpart F
NESHAP Subpart LLL

Emissions Unit Information Section 3 of 7 (Kiln System)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? E-21		2. Emission Point Type Code: 1	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): E-21: Main Stack			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: EU 002: Raw Mill and Air Heater discharge through E-21			
5. Discharge Type Code: V	6. Stack Height: 250 feet	7. Exit Diameter: 9.42 feet	
8. Exit Temperature: 356 °F	9. Actual Volumetric Flow Rate: 200000 acfm	10. Water Vapor: 6%	
11. Maximum Dry Standard Flow Rate: 144000 dscfm		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Available within 0.01 Kilometer Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): None			

Emissions Unit Information Section 3 of 7 (Kiln System)

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Preheater/Precalciner Kiln		
2. Source Classification Code (SCC): 3-05-006-23	3. SCC Units: Tons Processed	
4. Maximum Hourly Rate: 149.9	5. Maximum Annual Rate: 1114350	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Segment Description and Rate: Segment 2 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Preheater/Precalciner Kiln		
2. Source Classification Code (SCC): 3-05-006-23	3. SCC Units: Tons Clinker	
4. Maximum Hourly Rate: 95.8	5. Maximum Annual Rate: 712500	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 3 of 7 (Kiln System)

Segment Description and Rate: Segment 3 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use: Distillate Oil: Cement Kiln		
2. Source Classification Code (SCC): 3-90-005-02	3. SCC Units: 1000 Gallons Burned	
4. Maximum Hourly Rate: 0	5. Maximum Annual Rate: 0	6. Estimated Annual Activity Factor: 125
7. Maximum % Sulfur: 0.05	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: 141
10. Segment Comment (limit to 200 characters): None		

Segment Description and Rate: Segment 4 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use: Bituminous Coal: Cement Kiln		
2. Source Classification Code (SCC): 3-90-002-01	3. SCC Units: Tons Burned	
4. Maximum Hourly Rate: 14.0	5. Maximum Annual Rate: 122640	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: 1.25	8. Maximum % Ash: 10	9. Million Btu per SCC Unit: 26
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 3 of 7 (Kiln System)

Segment Description and Rate: Segment 5 of 5

1. Segment Description (Process/Fuel Type) (limit to 500 characters): In-Process Fuel Use: Tires		
2. Source Classification Code (SCC): 3-90-012-99		3. SCC Units: Tons Burned
4. Maximum Hourly Rate: 4.2	5. Maximum Annual Rate: 36792	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: 26
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 3 of 7 (Kiln System)

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010	None	EL
PM10	010	None	EL
SO2	None	None	EL
NOx	None	None	EL
CO	None	None	EL
VOC	None	None	EL
SAM	None	None	EL
H021	None	None	EL
H106	None	None	NS
DIOX	None	None	EL

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 1 of 9

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99%
3. Potential Emissions: 30.0 lb/hour 110.5 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.20 lb/ton dry feed Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 0.20 lb/ton x 149.9 tons/hr = 30.0 lb/hour @ 1114350 tons/yr = 110.5 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 0.20 lb/ton dry feed	4. Equivalent Allowable Emissions: 30.0 lb/hour 110.5 tons/year
5. Method of Compliance (limit to 60 characters): Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 2 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: PM10	2. Total Percent Efficiency of Control: 99%
3. Potential Emissions: 25.50 lb/hour 93.93 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.17 lb/ton dry feed Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 0.17 lb/ton x 149.9 tons/hr = 25.50 lb/hour @ 1114350 tons/yr = 93.93 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 0.17 lb/ton dry feed	4. Equivalent Allowable Emissions: 25.50 lb/hour 93.93 tons/year
5. Method of Compliance (limit to 60 characters): Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 3 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: SO2	2. Total Percent Efficiency of Control: Not Applicable
3. Potential Emissions: 26.82 lb/hour 99.8 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.28 lb/ton clinker Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 0.28 lb/ton x 95.83 tons/hour = 26.82 lb/hour @ 712500 tons/yr = 99.8 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
4. Requested Allowable Emissions and Units: 0.28 lb/ton clinker	4. Equivalent Allowable Emissions: 26.82 lb/hour 99.8 tons/year
5. Method of Compliance (limit to 60 characters): CEM	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 4 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: NOx	2. Total Percent Efficiency of Control: Not Applicable
3. Potential Emissions: 268.32 lb/hour 997.5 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 2.8 lb/ton Clinker Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 2.8 lb/ton x 95.83 tons/hour = 268.32 lb/hour @ 712500 tons/yr = 997.5 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: OTHER	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 3.8 lb/ton Clinker	4. Equivalent Allowable Emissions: 364.15 lb/hour 1353.8 tons/year
5. Method of Compliance (limit to 60 characters): CEM	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): During the first two years after startup.	

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 5 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: CO	2. Total Percent Efficiency of Control: Not Applicable
3. Potential Emissions: 345.0 lb/hour 1282.5 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 3.6 lb/ton Clinker Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 3.6 lb/ton x 95.83 tons/hour = 345.0 lb/hour @ 712500 tons/yr = 1282.5 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 3.6 lb/ton Clinker	4. Equivalent Allowable Emissions: 345.0 lb/hour 1282.5 tons/year
5. Method of Compliance (limit to 60 characters): Method 10	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 6 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: VOC		2. Total Percent Efficiency of Control: Not Applicable	
3. Potential Emissions: 11.50 lb/hour 42.8 tons/year		4. Synthetically Limited? []	
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year			
6. Emission Factor: 0.12 lb/ton Clinker Reference: BACT		7. Emissions Method Code: 0	
8. Calculation of Emissions (limit to 600 characters): 0.12 lb/ton x 95.83 tons/hour = 11.50 lb/hour @ 712500 tons/yr = 42.8 tons/year			
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None			

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE		2. Future Effective Date of Allowable Emissions: Not Applicable	
3. Requested Allowable Emissions and Units: 0.12 lb/ton Clinker		4. Equivalent Allowable Emissions: 11.50 lb/hour 42.8 tons/year	
5. Method of Compliance (limit to 60 characters): Method 25			
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC			

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 7 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: SAM	2. Total Percent Efficiency of Control: Not Applicable
3. Potential Emissions: 8.24 lb/hour 30.6 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.086 lb/ton Clinker Reference: AP-42 Table 11.6-9	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): 0.086 lb/ton x 95.83 tons/hour = 8.24 lb/hour @ 712500 tons/yr = 30.6 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: After Stack testing
3. Requested Allowable Emissions and Units: To Be Determined By Stack Tests	4. Equivalent Allowable Emissions: To Be Determined By Stack Tests
5. Method of Compliance (limit to 60 characters): Method 8	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 8 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: H021	2. Total Percent Efficiency of Control: Not Applicable
3. Potential Emissions: 0.00006 lb/hour 0.0002 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.0000066 lb/ton Clinker Reference: AP-42 Table 11.6-9	7. Emissions Method Code: 3
8. Calculation of Emissions (limit to 600 characters): 0.0000066 lb/ton x 95.83 tons/hour = 0.00006 lb/hour @ 712500 tons/yr = 0.0002 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: After Stack testing
3. Requested Allowable Emissions and Units: To Be Determined By Stack Tests	4. Equivalent Allowable Emissions: To Be Determined By Stack Tests
5. Method of Compliance (limit to 60 characters): Method 104	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 3 of 7 (Kiln System)

Pollutant Detail Information Page 9 of 9

Potential/Fugitive Emissions

1. Pollutant Emitted: DIOX	2. Total Percent Efficiency of Control: Not Applicable
3. Potential Emissions: 0.0000002 lb/hour 0.0000009 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 1.7×10^{-10} gr/dscf TEQ Reference: MACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): 1.7×10^{-10} gr/dscf x 144000 dscfm x 60 min/hour x 1.0 lb/7000 gr = 0.0000002 lb/hour @ 8760 hours/yr = 0.0000009 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: 6/14/2002
3. Requested Allowable Emissions and Units: 1.7×10^{-10} gr/dscf TEQ	4. Equivalent Allowable Emissions: 0.0000002 lb/hour 0.0000009 tons/year
5. Method of Compliance (limit to 60 characters): Method 23	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): NESHAP Subpart LLL	

Emissions Unit Information Section 3 of 7 (Kiln System)

**H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)**

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 10% Exceptional Conditions: 10% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
6. Visible Emissions Comment (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 3 of 7 (Kiln System)

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested Will be submitted with compliance test report
5. Compliance Test Report: Will be submitted in accordance with Rule 62-297, FAC <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: None

Emissions Unit Information Section 3 of 7 (Kiln System)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 4 of 7 (Clinker Handling)

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
<input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
<input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
<input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
<input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): <p style="text-align: center;">Clinker Handling</p>			
4. Emissions Unit Identification Number:			
ID: 004		<input type="checkbox"/> No ID	<input type="checkbox"/> ID Unknown
5. Emissions Unit Status Code: A	6. Initial Startup Date: Projected October 1999	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? <input type="checkbox"/>
9. Emissions Unit Comment: (Limit to 500 Characters) None			

Emissions Unit Information Section 4 of 7 (Clinker Handling)

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

**Electrostatic Precipitator – High Efficiency
Fabric Filters – High Temperature**

2. Control Device or Method Code(s): **010, 016**

Emissions Unit Details

1. Package Unit: **Not Applicable**

Manufacturer:

Model Number:

2. Generator Nameplate Rating: **Not Applicable** MW

3. Incinerator Information: **Not Applicable**

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Information Section 4 of 7 (Clinker Handling)

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: Not Applicable	mmBtu/hr
2. Maximum Incineration Rate: Not Applicable lb/hr	tons/day
3. Maximum Process or Throughput Rate: 95.83 TPH	
4. Maximum Production Rate: Not Applicable	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): None	

Emissions Unit Information Section 4 of 7 (Clinker Handling)

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-212.400, FAC
NSPS Subpart F
NESHAP Subpart LLL

Emissions Unit Information Section 4 of 7 (Clinker Handling)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? K-15, L-03, L-06		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): K-15: Clinker Cooler Stack L-03: Clinker Transport L-06: Clinker Silos			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Not Applicable			
5. Discharge Type Code: V	6. Stack Height: 115 feet	7. Exit Diameter: 9 feet	
8. Exit Temperature: 480 °F	9. Actual Volumetric Flow Rate: 160000 acfm	10. Water Vapor: Not Applicable %	
11. Maximum Dry Standard Flow Rate: Not Applicable dscfm		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Available within 0.01 Kilometer Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): K-15 is representative emission point with greatest emission rate.			

Emissions Unit Information Section 4 of 7 (Clinker Handling)

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Clinker Cooler		
2. Source Classification Code (SCC): 3-05-006-14		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 95.83	5. Maximum Annual Rate: 712500	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 4 of 7 (Clinker Handling)

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	010, 016	None	EL
PM10	010, 016	None	EL

Emissions Unit Information Section 4 of 7 (Clinker Handling)

Pollutant Detail Information Page 1 of 2

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99%
3. Potential Emissions: 15.4 lb/hour 57.5 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factors: 0.10 lb/ton dry feed & 0.01 gr/dscf Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): ESP 0.10 lb/ton x 149.9 tons/hr = 14.99 lb/hour @ 1114350 tons/yr = 55.7 tons/year Baghouses 0.01 gr/dscf x 4766 dscfm x 60 min/hr x 1 lb/7000 gr = 0.41 lb/hour @ 8760 hours/year = 1.8 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 0.10 lb/ton dry feed & 0.01 gr/dscf	4. Equivalent Allowable Emissions: 15.4 lb/hour 57.5 tons/year
5. Method of Compliance (limit to 60 characters): Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 4 of 7 (Clinker Handling)

Pollutant Detail Information Page 2 of 2

Potential/Fugitive Emissions

1. Pollutant Emitted: PM10	2. Total Percent Efficiency of Control: 99%
3. Potential Emissions: 12.71 lb/hour 47.3 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factor: 0.085 lb/ton dry feed Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): ESP 0.085 lb/ton x 149.9 tons/hr = 12.71 lb/hour @ 1114350 tons/yr = 47.3 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 0.085 lb/ton dry feed	4. Equivalent Allowable Emissions: 12.71 lb/hour 47.3 tons/year
5. Method of Compliance (limit to 60 characters): Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 4 of 7 (Clinker Handling)

**H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)**

Visible Emissions Limitation: Visible Emissions Limitation 1 of 2

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 5% Exceptional Conditions: 5% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment (limit to 200 characters): 62-212.400, FAC Baghouses	

Visible Emissions Limitation: Visible Emissions Limitation 2 of 2

1. Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 10% Exceptional Conditions: 10% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment (limit to 200 characters): 62-212.400, FAC ESP	

Emissions Unit Information Section 4 of 7 (Clinker Handling)

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested Will be submitted with compliance test report
5. Compliance Test Report: Will be submitted in accordance with Rule 62-297, FAC <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: None

Emissions Unit Information Section 4 of 7 (Clinker Handling)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

<p>1. Type of Emissions Unit Addressed in This Section: (Check one)</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).</p> <p><input checked="" type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.</p> <p><input type="checkbox"/> This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.</p>			
<p>2. Regulated or Unregulated Emissions Unit? (Check one)</p> <p><input checked="" type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.</p> <p><input type="checkbox"/> The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.</p>			
<p>3. Description of Emissions Unit Addressed in This Section (limit to 60 characters):</p> <p style="text-align: center;">Finish Grinding Operations</p>			
<p>4. Emissions Unit Identification Number: ID: 005</p> <p style="text-align: right;"><input type="checkbox"/> No ID <input type="checkbox"/> ID Unknown</p>			
<p>5. Emissions Unit Status Code: A</p>	<p>6. Initial Startup Date: Projected October 1999</p>	<p>7. Emissions Unit Major Group SIC Code: 32</p>	<p>8. Acid Rain Unit? <input type="checkbox"/></p>
<p>9. Emissions Unit Comment: (Limit to 500 Characters) None</p>			

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Fabric Filters – Medium Temperature
Fabric Filters – Low Temperature

2. Control Device or Method Code(s): **017, 018**

Emissions Unit Details

1. Package Unit: **Not Applicable**

Manufacturer:

Model Number:

2. Generator Nameplate Rating: **Not Applicable** MW

3. Incinerator Information: **Not Applicable**

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**B. EMISSIONS UNIT CAPACITY INFORMATION
(Regulated Emissions Units Only)**

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: Not Applicable	mmBtu/hr
2. Maximum Incineration Rate: Not Applicable lb/hr	tons/day
3. Maximum Process or Throughput Rate: Not Applicable	
4. Maximum Production Rate: 136 TPH	
5. Requested Maximum Operating Schedule:	
24 hours/day	7 days/week
52 weeks/year	8760 hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters): None	

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-212.400, FAC
NSPS Subpart F
NESHAP Subpart LLL

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? M-07, M-08, N-09, N-12, N-14, Q-25, Q-26, Q-27		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): M-07: Clinker to finish mill M-08: Clinker to finish mill N-09: Finish mill separator N-12: Finish mill N-14: Cement handling in finish mill Q-25, Q-26, Q-27: Cement storage silos			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Not Applicable			
5. Discharge Type Code: V	6. Stack Height: 123 feet	7. Exit Diameter: 3.1 feet	
8. Exit Temperature: 210 °F	9. Actual Volumetric Flow Rate: 30000 acfm	10. Water Vapor: 2 %	
11. Maximum Dry Standard Flow Rate: 23200 dscfm		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Available within 0.01 Kilometer Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): N-12 is representative emission point with greatest emission rate.			

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Finish Grinding Mill		
2. Source Classification Code (SCC): 3-05-006-17		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 136	5. Maximum Annual Rate: 1191360	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	017, 018	None	EL
PM10	017, 018	None	NS

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

Pollutant Detail Information Page 1 of 1

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99%
3. Potential Emissions: 6.20 lb/hour 27.2 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factors: 0.01 gr/dscf Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): <u>Baghouses</u> 0.01 gr/dscf x 72293 dscfm x 60 min/hr x 1 lb/7000 gr = 6.20 lb/hour @ 8760 hours/year = 27.2 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 0.01 gr/dscf	4. Equivalent Allowable Emissions: 6.20 lb/hour 27.2 tons/year
5. Method of Compliance (limit to 60 characters): Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)**

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: <input checked="" type="checkbox"/> Rule <input type="checkbox"/> Other
3. Requested Allowable Opacity: Normal Conditions: 5% Exceptional Conditions: 5% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment (limit to 200 characters): 62-212.400, FAC Baghouses	

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)**

Continuous Monitoring System: Continuous Monitor ___ of ___

1. Parameter Code: Not Subject	2. Pollutant(s): Not Subject
3. CMS Requirement: Not Subject	[] Rule [] Other
4. Monitor Information: Not Subject Manufacturer: Model Number: Serial Number:	
5. Installation Date: Not Subject	6. Performance Specification Test Date: Not Subject
7. Continuous Monitor Comment (limit to 200 characters): None	

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested Will be submitted with compliance test report
5. Compliance Test Report: Will be submitted in accordance with Rule 62-297, FAC <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: None

Emissions Unit Information Section 5 of 7 (Finish Grinding Operations)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 6 of 7 (Cement Handling)

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
[] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
[] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
[] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Cement Handling, Loading, and Bagging			
4. Emissions Unit Identification Number: ID: 006		[] No ID [] ID Unknown	
5. Emissions Unit Status Code: A	6. Initial Startup Date: Projected October 1999	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters) None			

Emissions Unit Information Section 6 of 7 (Cement Handling)

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Fabric Filters – Low Temperature

2. Control Device or Method Code(s): **018**

Emissions Unit Details

1. Package Unit: **Not Applicable**

Manufacturer:

Model Number:

2. Generator Nameplate Rating: **Not Applicable** MW

3. Incinerator Information: **Not Applicable**

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Information Section 6 of 7 (Cement Handling)

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-212.400, FAC
NSPS Subpart F
NESHAP Subpart LLL

Emissions Unit Information Section 6 of 7 (Cement Handling)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? Q-14, Q-17, Q-21, R-12		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): Q-14, Q-17, Q-21: Cement silo loadout R-12: Cement bagging operation			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Not Applicable			
5. Discharge Type Code: V	6. Stack Height: 100 feet	7. Exit Diameter: 2.0 feet	
8. Exit Temperature: 150 °F	9. Actual Volumetric Flow Rate: 12000 acfm	10. Water Vapor: 2 %	
11. Maximum Dry Standard Flow Rate: 10200 dscfm		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Available within 0.01 Kilometer Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): R-12 is representative emission point with greatest emission rate.			

Emissions Unit Information Section 6 of 7 (Cement Handling)

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Cement Manufacturing – Dry Process: Cement Loadout		
2. Source Classification Code (SCC): 3-05-006-19		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 500	5. Maximum Annual Rate: 1191360	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): Annual rate limited by cement production		

Emissions Unit Information Section 6 of 7 (Cement Handling)

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018	None	EL
PM10	018	None	NS

Emissions Unit Information Section 6 of 7 (Cement Handling)

Pollutant Detail Information Page 1 of 1

**G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)**

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99%
3. Potential Emissions: 1.53 lb/hour 6.7 tons/year	4. Synthetically Limited? []
5. Range of Estimated Fugitive Emissions: Not Applicable [] 1 [] 2 [] 3 _____ to _____ tons/year	
6. Emission Factors: 0.01 gr/dscf Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): <u>Baghouses</u> 0.01 gr/dscf x 17814 dscfm x 60 min/hr x 1 lb/7000 gr = 1.53 lb/hour @ 8760 hours/year = 6.7 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 0.01 gr/dscf	4. Equivalent Allowable Emissions: 1.53 lb/hour 6.7 tons/year
5. Method of Compliance (limit to 60 characters): Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 6 of 7 (Cement Handling)

**H. VISIBLE EMISSIONS INFORMATION
(Only Regulated Emissions Units Subject to a VE Limitation)**

Visible Emissions Limitation: Visible Emissions Limitation 1 of 1

1. Visible Emissions Subtype: VE05	2. Basis for Allowable Opacity: [<input checked="" type="checkbox"/>] Rule [<input type="checkbox"/>] Other
3. Requested Allowable Opacity: Normal Conditions: 5% Exceptional Conditions: 5% Maximum Period of Excess Opacity Allowed: 0 min/hour	
4. Method of Compliance: Method 9	
5. Visible Emissions Comment (limit to 200 characters): 62-212.400, FAC Baghouses	

Emissions Unit Information Section 6 of 7 (Cement Handling)

**I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)**

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code: Not Subject	2. Pollutant(s): Not Subject
3. CMS Requirement: Not Subject	[] Rule [] Other
4. Monitor Information: Not Subject Manufacturer: Model Number: Serial Number:	
5. Installation Date: Not Subject	6. Performance Specification Test Date: Not Subject
7. Continuous Monitor Comment (limit to 200 characters): None	

Emissions Unit Information Section 6 of 7 (Cement Handling)

**J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)**

Supplemental Requirements

<p>1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years</p>
<p>2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years</p>
<p>4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested Will be submitted with compliance test report</p>
<p>5. Compliance Test Report: Will be submitted in accordance with Rule 62-297, FAC <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable</p>
<p>6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested</p>
<p>8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable</p>
<p>10. Supplemental Requirements Comment: None</p>

Emissions Unit Information Section 6 of 7 (Cement Handling)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

Emissions Unit Information Section 7 of 7 (Coal Handling)

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through J as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

**A. GENERAL EMISSIONS UNIT INFORMATION
(All Emissions Units)**

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)			
[] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).			
[X] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.			
[] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.			
2. Regulated or Unregulated Emissions Unit? (Check one)			
[X] The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit.			
[] The emissions unit addressed in this Emissions Unit Information Section is an unregulated emissions unit.			
3. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Coal Handling and Grinding			
4. Emissions Unit Identification Number: ID: 007		[] No ID [] ID Unknown	
5. Emissions Unit Status Code: A	6. Initial Startup Date: Projected October 1999	7. Emissions Unit Major Group SIC Code: 32	8. Acid Rain Unit? []
9. Emissions Unit Comment: (Limit to 500 Characters) None			

Emissions Unit Information Section 7 of 7 (Coal Handling)

Emissions Unit Control Equipment

1. Control Equipment/Method Description (Limit to 200 characters per device or method):

Fabric Filters – Low Temperature

2. Control Device or Method Code(s): **018**

Emissions Unit Details

1. Package Unit: **Not Applicable**

Manufacturer:

Model Number:

2. Generator Nameplate Rating: **Not Applicable** MW

3. Incinerator Information: **Not Applicable**

Dwell Temperature:

°F

Dwell Time:

seconds

Incinerator Afterburner Temperature:

°F

Emissions Unit Information Section 7 of 7 (Coal Handling)

**C. EMISSIONS UNIT REGULATIONS
(Regulated Emissions Units Only)**

List of Applicable Regulations

62-212.400, FAC
NSPS Subpart Y
NESHAP Subpart LLL

Emissions Unit Information Section 7 of 7 (Coal Handling)

**D. EMISSION POINT (STACK/VENT) INFORMATION
(Regulated Emissions Units Only)**

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? S-17, S-21		2. Emission Point Type Code: 3	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): S-17: Coal mill S-21: Coal bin			
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: Not Applicable			
5. Discharge Type Code: V	6. Stack Height: 164 feet	7. Exit Diameter: 2.4 feet	
8. Exit Temperature: 150 °F	9. Actual Volumetric Flow Rate: 18000 acfm	10. Water Vapor: 6.5 %	
11. Maximum Dry Standard Flow Rate: 14600 dscfm		12. Nonstack Emission Point Height: Not Applicable feet	
13. Emission Point UTM Coordinates: Not Available within 0.01 Kilometer Zone: East (km): North (km):			
14. Emission Point Comment (limit to 200 characters): S-17 is representative emission point with greatest emission rate.			

Emissions Unit Information Section 7 of 7 (Coal Handling)

**E. SEGMENT (PROCESS/FUEL) INFORMATION
(All Emissions Units)**

Segment Description and Rate: Segment 1 of 1

1. Segment Description (Process/Fuel Type) (limit to 500 characters): Mineral Products: Coal Crushing		
2. Source Classification Code (SCC): 3-05-010-10		3. SCC Units: Tons Processed
4. Maximum Hourly Rate: 14	5. Maximum Annual Rate: 122640	6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum % Ash: Not Applicable	9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment (limit to 200 characters): None		

Emissions Unit Information Section 7 of 7 (Coal Handling)

**F. EMISSIONS UNIT POLLUTANTS
(All Emissions Units)**

1. Pollutant Emitted	2. Primary Control Device Code	3. Secondary Control Device Code	4. Pollutant Regulatory Code
PM	018	None	EL
PM10	018	None	NS

Emissions Unit Information Section 7 of 7 (Coal Handling)

Pollutant Detail Information Page 1 of 1

G. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION
(Regulated Emissions Units -
Emissions-Limited and Preconstruction Review Pollutants Only)

Potential/Fugitive Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control: 99%
3. Potential Emissions: 1.47 lb/hour 6.4 tons/year	4. Synthetically Limited? [<input type="checkbox"/>]
5. Range of Estimated Fugitive Emissions: Not Applicable [<input type="checkbox"/>] 1 [<input type="checkbox"/>] 2 [<input type="checkbox"/>] 3 _____ to _____ tons/year	
6. Emission Factors: 0.01 gr/dscf Reference: BACT	7. Emissions Method Code: 0
8. Calculation of Emissions (limit to 600 characters): <u>Baghouses</u> 0.01 gr/dscf x 17113 dscfm x 60 min/hr x 1 lb/7000 gr = 1.47 lb/hour @ 8760 hours/year = 6.4 tons/year	
9. Pollutant Potential/Fugitive Emissions Comment (limit to 200 characters): None	

Allowable Emissions Allowable Emissions 1 of 1

1. Basis for Allowable Emissions Code: RULE	2. Future Effective Date of Allowable Emissions: Not Applicable
3. Requested Allowable Emissions and Units: 0.01 gr/dscf	4. Equivalent Allowable Emissions: 1.47 lb/hour 6.4 tons/year
5. Method of Compliance (limit to 60 characters): Method 5	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters): 62-212.400, FAC	

Emissions Unit Information Section 7 of 7 (Coal Handling)

I. CONTINUOUS MONITOR INFORMATION
(Only Regulated Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor ____ of ____

1. Parameter Code: Not Subject	2. Pollutant(s): Not Subject
3. CMS Requirement: Not Subject	[] Rule [] Other
4. Monitor Information: Not Subject Manufacturer: Model Number: Serial Number:	
5. Installation Date: Not Subject	6. Performance Specification Test Date: Not Subject
7. Continuous Monitor Comment (limit to 200 characters): None	

Emissions Unit Information Section 7 of 7 (Coal Handling)

J. EMISSIONS UNIT SUPPLEMENTAL INFORMATION
(Regulated Emissions Units Only)

Supplemental Requirements

1. Process Flow Diagram <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
2. Fuel Analysis or Specification <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
3. Detailed Description of Control Equipment <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested Submitted to Department within previous five years
4. Description of Stack Sampling Facilities <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Not Applicable <input checked="" type="checkbox"/> Waiver Requested Will be submitted with compliance test report
5. Compliance Test Report: Will be submitted in accordance with Rule 62-297, FAC <input type="checkbox"/> Attached, Document ID: _____ <input type="checkbox"/> Previously submitted, Date: _____ <input type="checkbox"/> Not Applicable
6. Procedures for Startup and Shutdown <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
7. Operation and Maintenance Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> Waiver Requested
8. Supplemental Information for Construction Permit Application <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Other Information Required by Rule or Statute <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Supplemental Requirements Comment: None

Emissions Unit Information Section 7 of 7 (Coal Handling)

Additional Supplemental Requirements for Title V Air Operation Permit Applications

11. Alternative Methods of Operation <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
12. Alternative Modes of Operation (Emissions Trading) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
13. Identification of Additional Applicable Requirements <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
14. Compliance Assurance Monitoring Plan <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
15. Acid Rain Part Application (Hard-copy Required) <input type="checkbox"/> Acid Rain Part - Phase II (Form No. 62-210.900(1)(a)) Attached, Document ID: _____ <input type="checkbox"/> Repowering Extension Plan (Form No. 62-210.900(1)(a)1.) Attached, Document ID: _____ <input type="checkbox"/> New Unit Exemption (Form No. 62-210.900(1)(a)2.) Attached, Document ID: _____ <input type="checkbox"/> Retired Unit Exemption (Form No. 62-210.900(1)(a)3.) Attached, Document ID: _____ <input type="checkbox"/> Phase II NOx Compliance Plan (Form No. 62-210.900(1)(a)4.) Attached, Document ID: _____ <input type="checkbox"/> Phase NOx Averaging Plan (Form No. 62-210.900(1)(a)5.) Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable



September 17, 1999

RECEIVED

SEP 22 1999

BUREAU OF AIR REGULATION

Mr. A. A. Linero, P.E.
Administrator – New Source Review Section
Florida department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Florida Rock Industries – Facility No. 0010087
Request for Extension – AC01-267311, PSD-FL-228

Dear Mr. Linero,

Per your letter of September 8, 1999, enclosed is the processing fee of \$50.00 needed to grant our Request for Extension, for the above referenced permit pursuant to rule 62-4.050(4)(r)3., F.A.C.

Sincerely,

Fred W. Cohrs
Vice President

FWC/bc
Enclosures

Post-it® Fax Note	7671	Date	3/1	# of pages	1
To	Bridgette	From	al luno		
Co./Dept.	Carol Hoff	Co.	DEP-Air		
Phone #		Phone #			
Fax #		Fax #			

BEST AVAILABLE COPY



FLORIDA ROCK INDUSTRIES, INC.

POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

64-1278
611

CHECK NO.
1060002668

Fifty Dollars And 00 Cents ***** VOID AFTER 90 DAYS

PAY TO THE ORDER OF
Florida Department of Environmental Pro

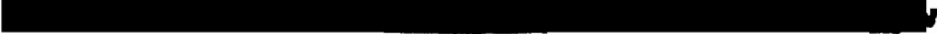
DATE
17-SEP-99

CHECK AMOUNT
*****50.00

[Handwritten Signature]
AUTHORIZED SIGNATURE

SIGNATURE HAS A COLORED BACKGROUND - BORDER CONTAINS MICROPRINTING

NationsBank Customer Connection, NationsBank, N.A.



FLORIDA ROCK INDUSTRIES, INC.
POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

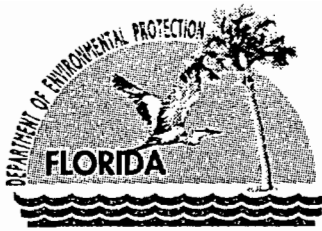
DATE 17-SEP-99 PAGE 1
CHECK NUMBER: 1060002668

SUPPLIER NAME: Florida Department of Environmental Pro SUPPLIER NUMBER: 2538 COMPANY: 0150

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	DISCOUNT	AMOUNT
EXTFEEACO1	10-SEP-99	<i>Beverly C.</i>	0.00	50.00

THE ATTACHED CHECK IS IN PAYMENT FOR ITEMS DESCRIBED ABOVE

TOTAL \$0.00 \$50.00



Jeb Bush
Governor

Department of Environmental Protection

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

David B. Struhs
Secretary

September 8, 1999

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Fred W. Cohrs, Vice President
Florida Rock Industries
155 East 21st Street
Post Office Box 4667
Jacksonville, Florida 32201

Re: Florida Rock Industries – Facility No. 0010087
Request for an Extension – AC01-267311, PSD-FL-228

Dear Mr. Cohrs:

The Bureau of Air Regulation received your request for extension of time for the above referenced permit. Before we can begin processing your request, we will need a processing fee of \$50 pursuant to rule 62-4.050(4)(r)3., F.A.C.

If you have any questions, please call Ms. Teresa Heron at (850)921-9529.

Sincerely,

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

AL/t

cc: J. Cole, NED

RECEIVED

SEP 02 1999

BUREAU OF AIR REGULATION



August 30, 1999

Mr. Johnny L. Cole
Permitting Engineer
Florida Department of
Environmental Protection
Northeast District
7325 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

Re: Alachua County – AP ID No. 0010087
Air Construction Permit No. AC01-267311, Exp. Date 12-31-99

Dear Mr. Cole,

Thank you for your notice to file for an operating permit for subject portland cement plant.

Certain unscheduled events have delayed the plant construction.

We will be unable to complete performance testing in calendar year 1999 and respectfully request an extension of the construction permit until July 30, 2000.

I would appreciate your consideration of this request and grant the extension.

Sincerely,

Fred W. Cohrs
Vice President

FWC/bc

Cc: Mr. Al Linero – FDEP
Mr. Cary O Cohrs – FRI
(Plant Manager – Thompson S. Baker Cement Plant)

Fold at line over top of envelope to return address

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 Fred W. Cohrs, VP
 Fla. Rock Industries
 P O Box 4667
 Jacksonville, Fl 32201

4a. Article Number
 Z 333 618 136

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 9-10-99

5. Received By: (Print Name)
 J. H. Cohrs

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 X

Thank you for using Return Receipt Service.

Z 333 618 136

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to		Fred Cohrs	
Street & Number		FLA. ROCK Ind	
Post Office, State, & ZIP Code		Jax FL	
Postage		\$	
Certified Fee			
Special Delivery Fee			
Restricted Delivery Fee			
Return Receipt Showing to Whom & Date Delivered			
Return Receipt Showing to Whom, Date, & Addressee's Address			
TOTAL Postage & Fees		\$	
Postmark or Date	9-8-99		

PS Form 3800, April 1995

RECEIVED

SEP 02 1999

BUREAU OF AIR REGULATION



August 30, 1999

Mr. Johnny L. Cole
Permitting Engineer
Florida Department of
Environmental Protection
Northeast District
7325 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

Re: Alachua County – AP ID No. 0010087
Air Construction Permit No. AC01-267311, Exp. Date 12-31-99

Dear Mr. Cole,

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Certain unscheduled events have delayed the plant construction.

We will be unable to complete performance testing in calendar year 1999 and respectfully request an extension of the construction permit until July 30, 2000.

I would appreciate your consideration of this request and grant the extension.

Sincerely,

Fred W. Cohrs
Vice President

FWC/bc

Cc: Mr. Al Linero – FDEP
Mr. Cary O Cohrs – FRI
(Plant Manager – Thompson S. Baker Cement Plant)

RECEIVED

SEP 11 2000

BUREAU OF AIR REGULATION

To: Al Linero
 From: Mort Benjamin
 Date: September 7, 2000
 Subj.: Acid Mist and Beryllium Tests from Florida Rock Cement Plant

I am sending you a copy of the test report from Florida Rock in Newberry. The results from the sulfuric acid mist and beryllium are guides to permit limits.

The tests are reported as pounds emitted per hour. The kiln feed rate is reported as well. I have calculated the emission rates to pounds of pollutant per ton of clinker:

$\text{Feed Rate Actual/Feed Rate permit} \times \text{Clinker Rate permit} = \text{tons/hr clinker}$

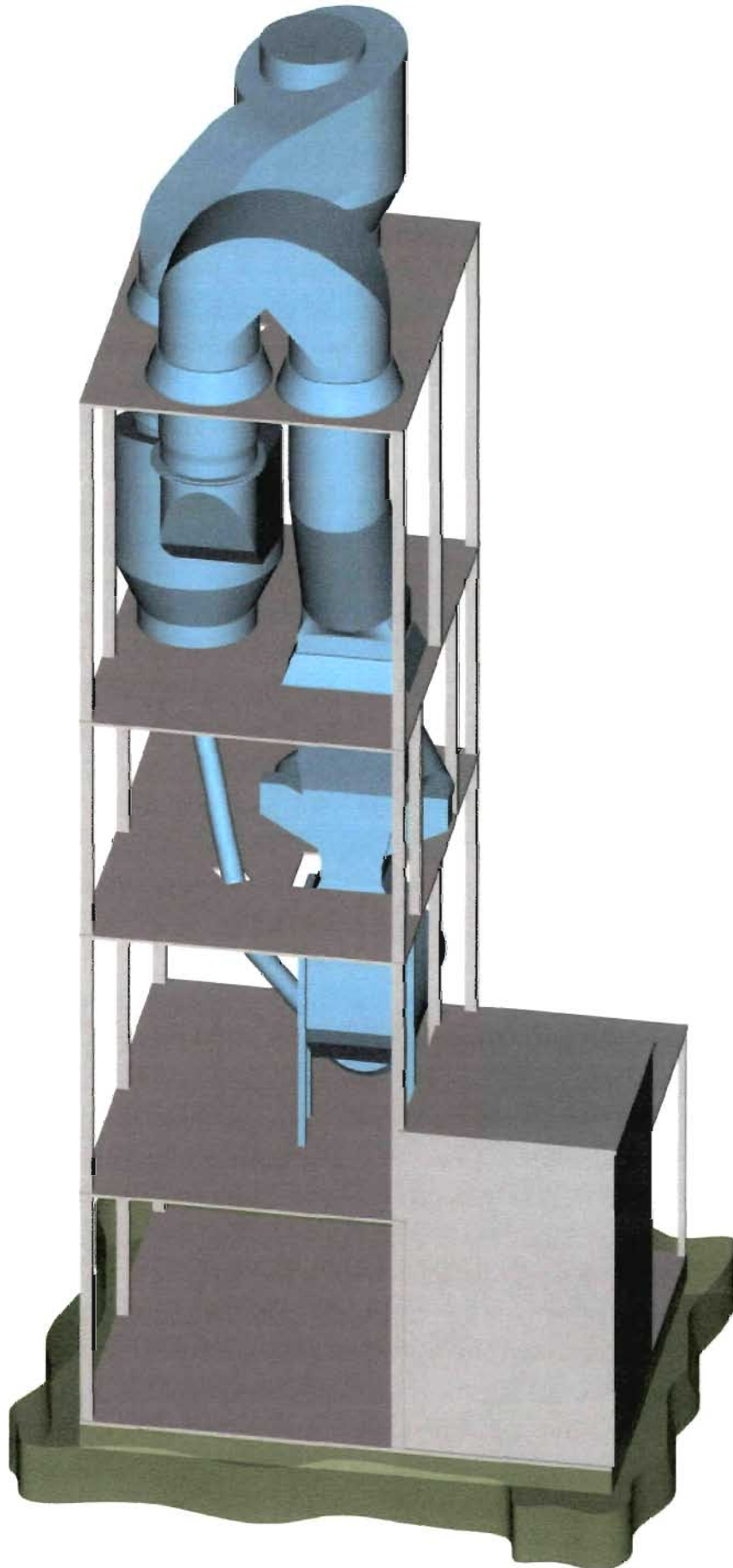
$\text{Pounds emitted per hour/ tons per hour clinker} = \text{pounds/ton clinker}$

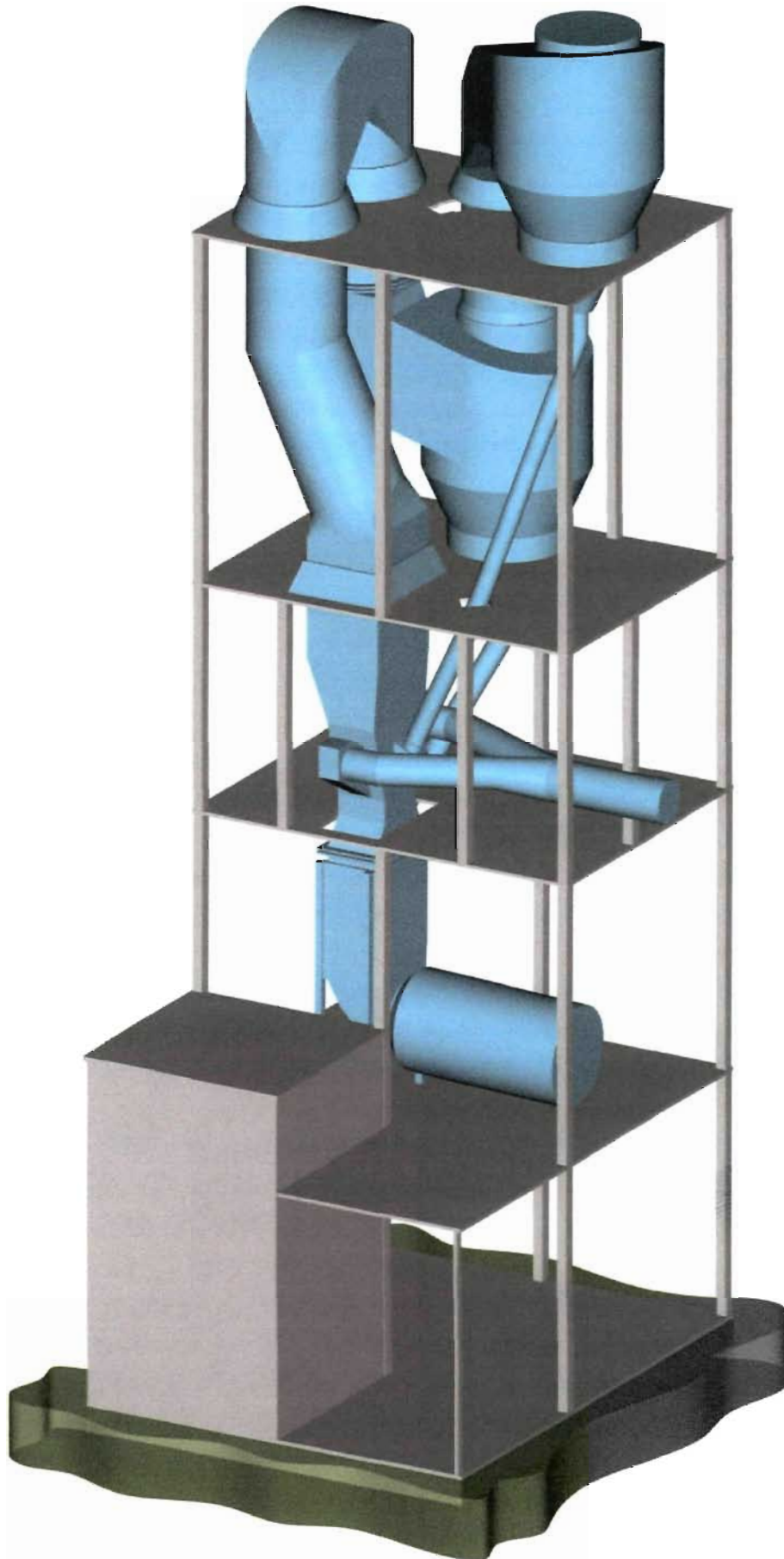
Sulfuric Acid Mist

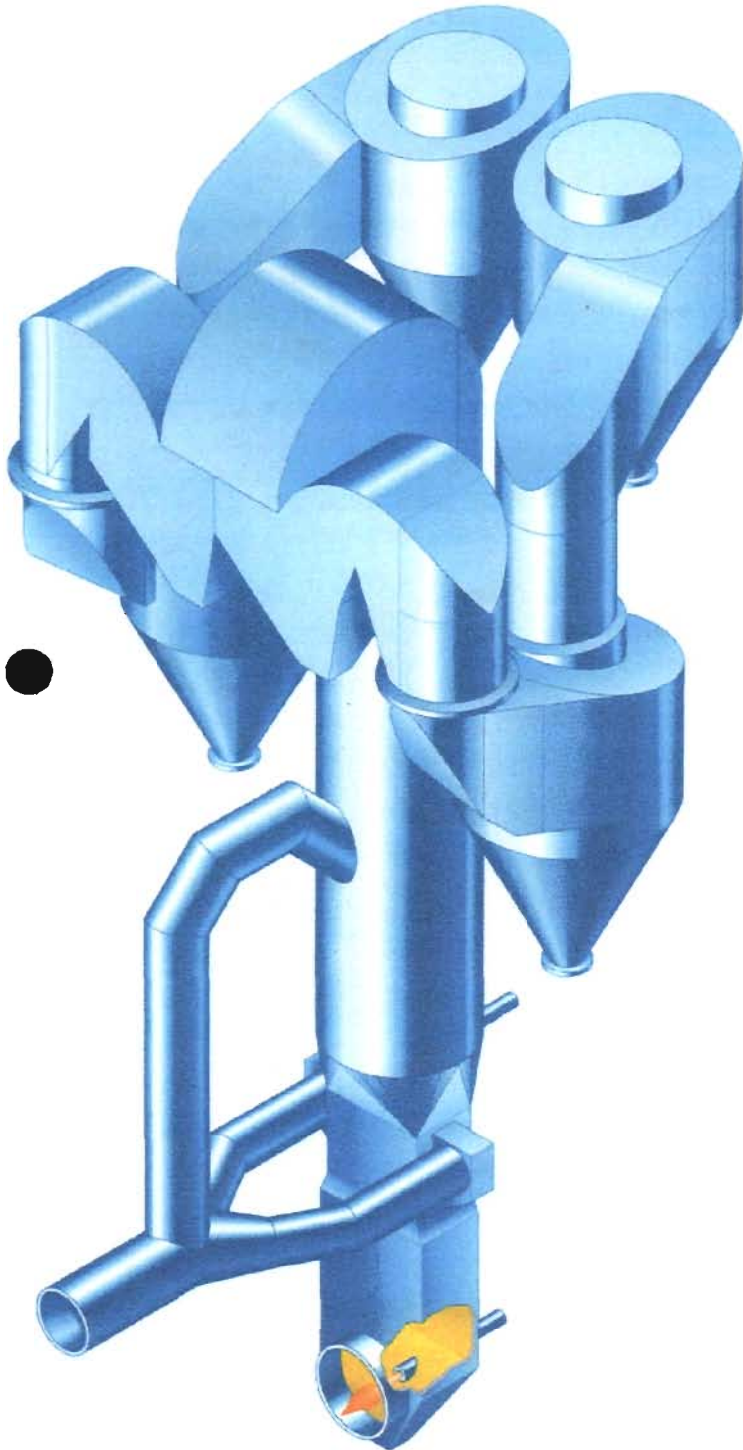
Feed Rate Tons/hr	Ratio	Clinker Rate Tons/hr	Emissions lbs/hr	lbs/ton
139.8	$139.8/149.9$ $\times 95.8$	89.34	0.0003	$3.36 \text{ e-}6$

Beryllium

138.3	$138.3/149.9$ $\times 95.8$	88.38	0.06	$6.79 \text{ e-}4$
-------	--------------------------------	-------	------	--------------------







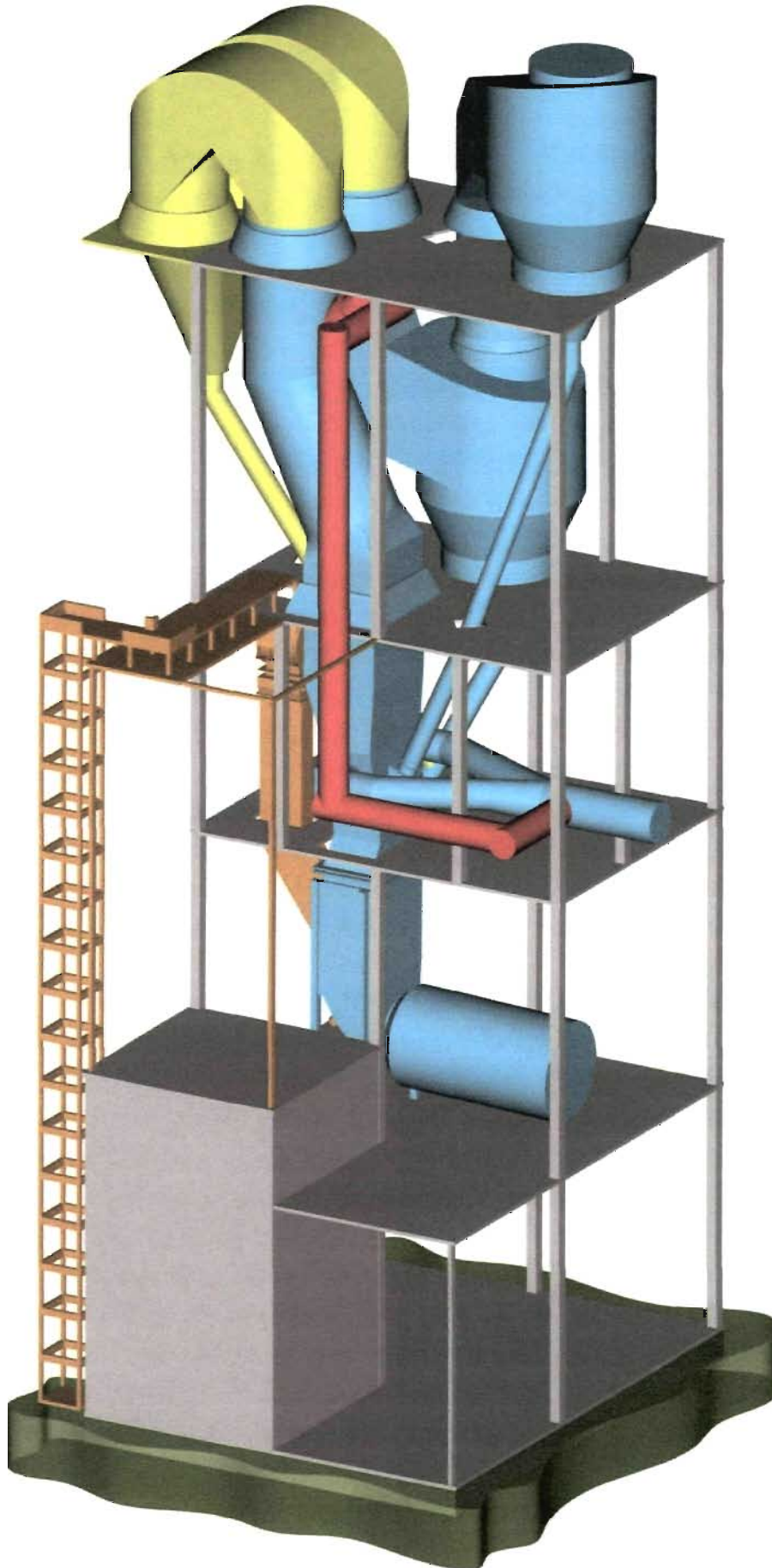
The MSC process involves no extra operating costs, reducing emissions by staggered introduction of the fuel and tertiary air, which causes the combustion to take place in several stages.

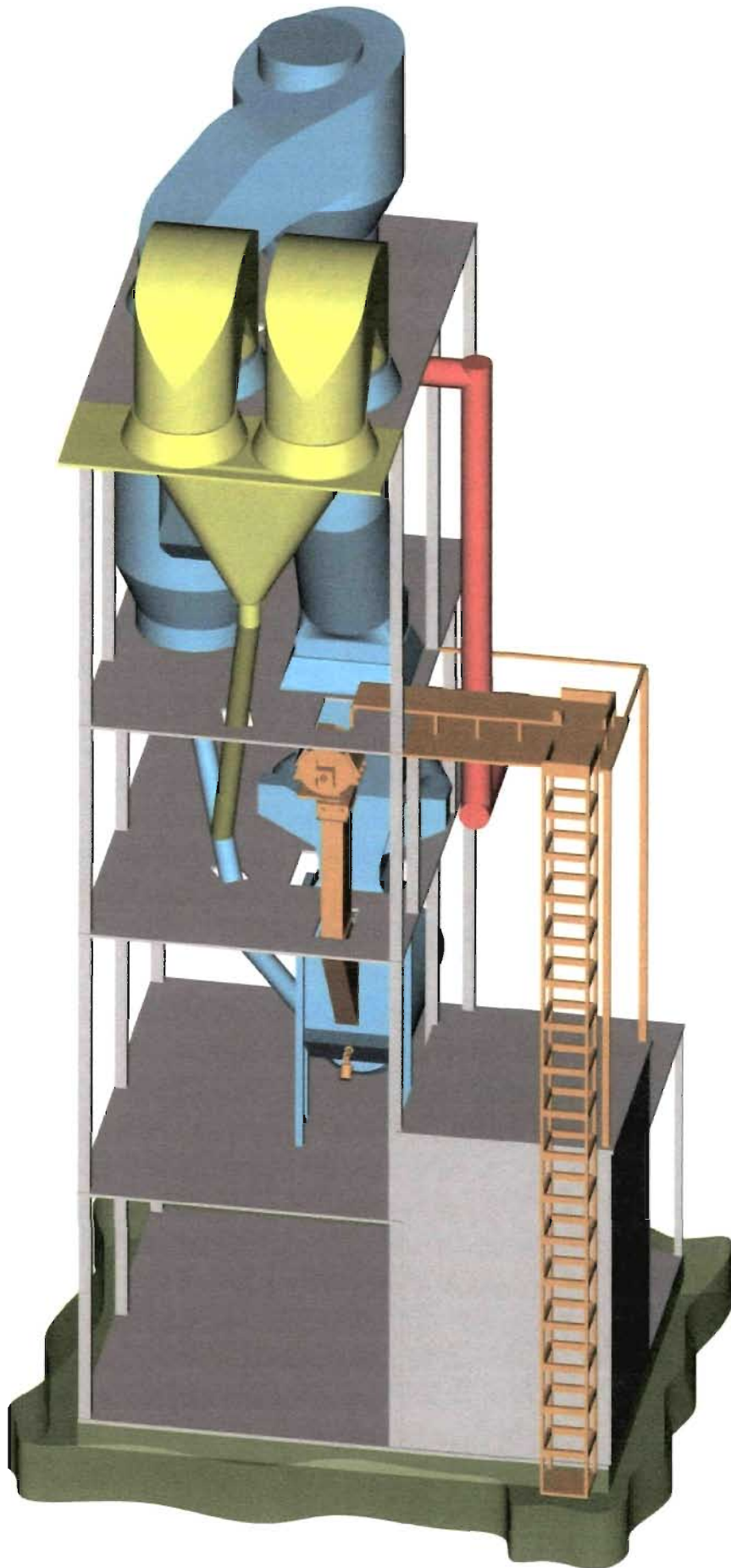
In the first stage, the nitrogen oxides generated in the sintering zone of the rotary kiln are reduced by the introduction of approximately 10% of the total fuel utilizing fuels such as tires, a separate inlet burner, or other replacement fuels. The fuel is injected against the direction of flow of the kiln gases and is pyrolyzed in its gas phase. In the reducing atmosphere, which is formed, the nitrogen oxides are converted into nitrogen, which is not harmful to the environment.

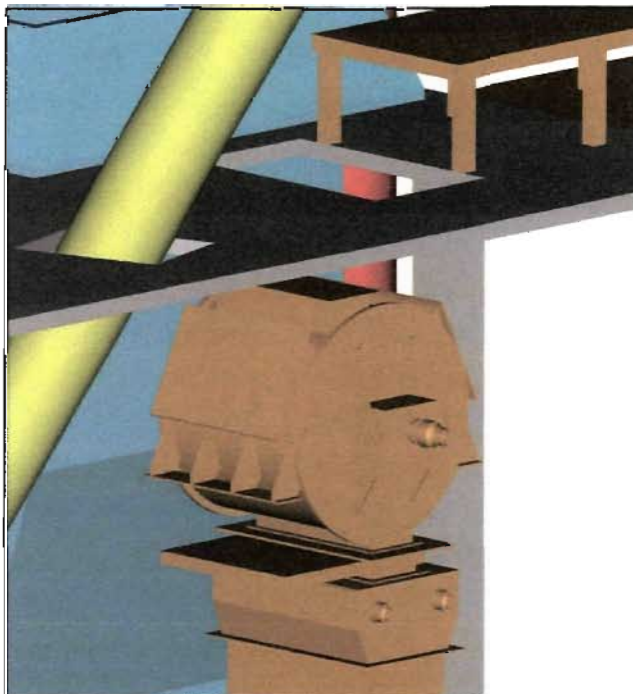
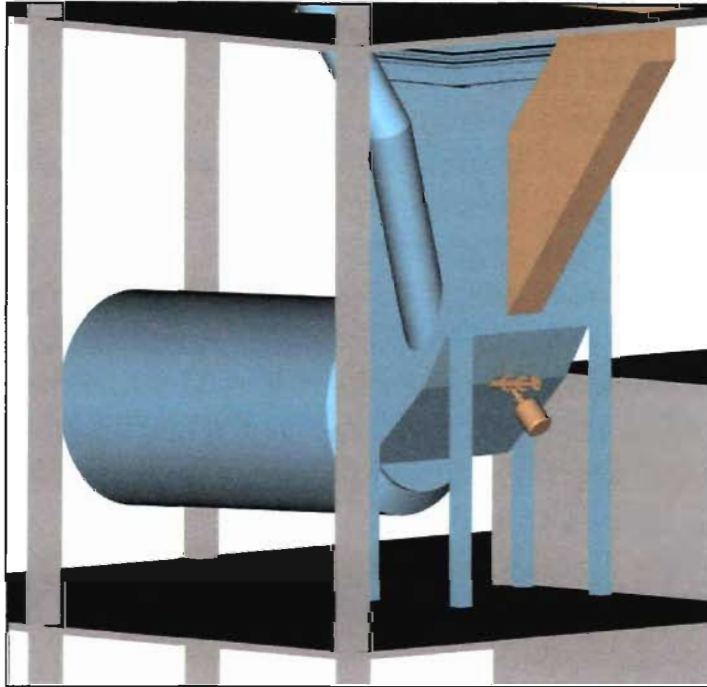
In order to prevent new NO_x from being generated in the calciner, the calcining fuel also has to be burnt under reducing conditions. This is achieved by staggered introduction of the combustion air, so that the fuel is first burnt under reducing conditions and then completed under oxidizing conditions.

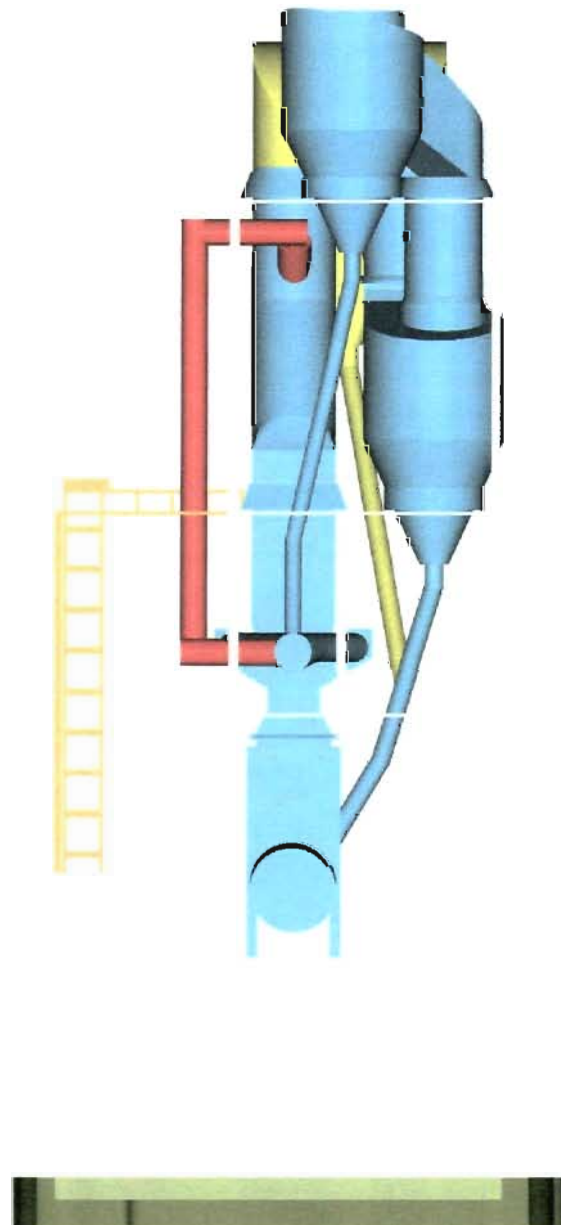
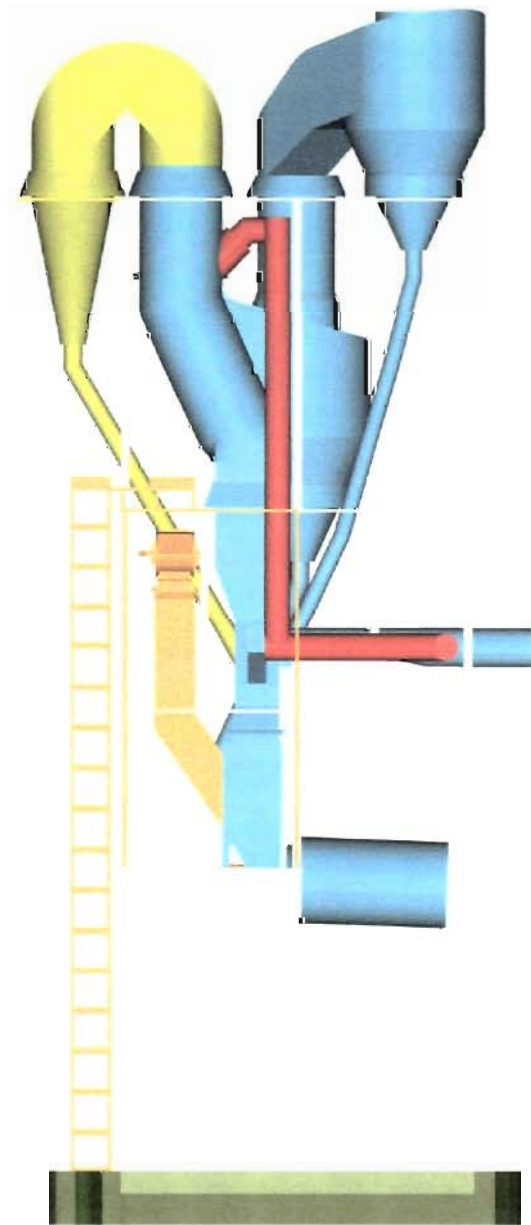
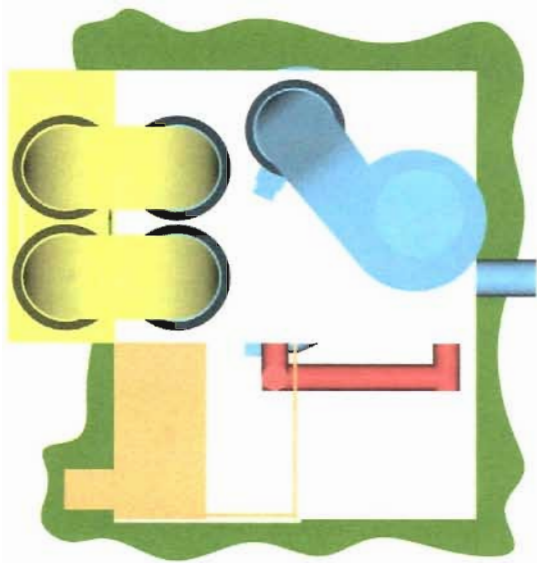
This minimizes the generation of new NO_x in the calciner, and further reduces the nitrogen oxides coming from the rotary kiln.

NO_x emissions from the present preheater configuration of the Thompson S. Baker Cement Plant have been measured to be 3.5 lbs/ton clinker. The proposed modifications are intended to reduce NO_x emissions sufficiently to meet the future permitted level of 2.8 lbs/ton clinker.







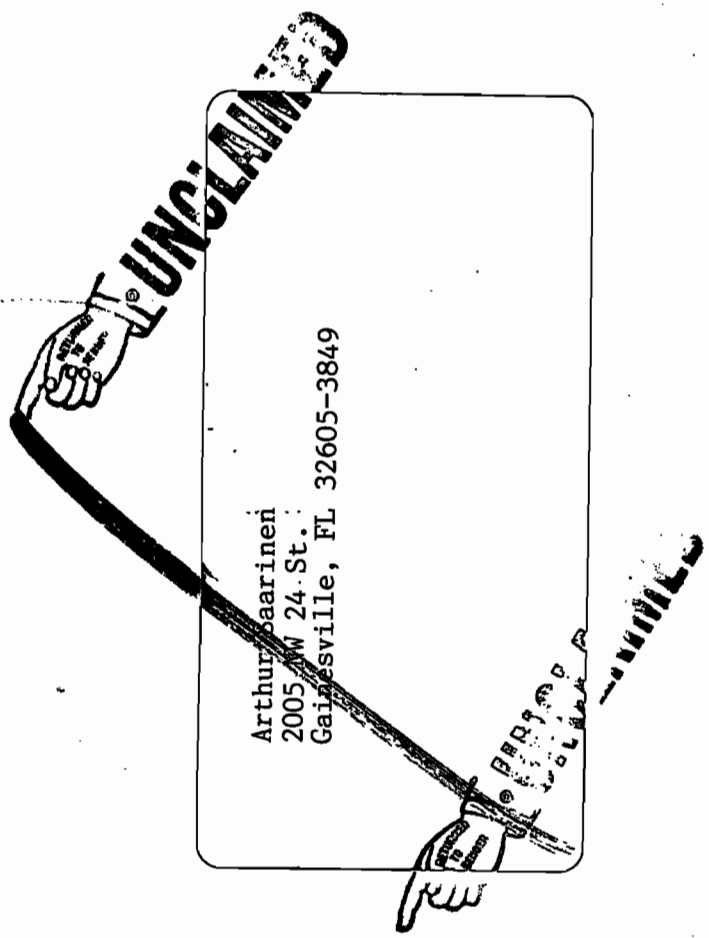


715 5518 Mc # 55-18

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



RECEIVED
AUG 08 2001
BUREAU OF AIR REGULATION



NLS 548
0548
7/11

7/16
7/27

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Arthur Saarinen
 2005 NW 25 St.
 Gainesville, FL 32605-3849

2. Article Number (Copy from service label)

7000 0600 0026 4129 8368

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

C. Signature

X Agent AddresseeD. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

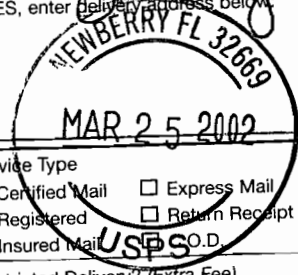
Mr. George Townsend
 Environmental & Safety Manager
 Florida Rock Industries
 Post Office Box 459
 Newberry, FL 32669

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) Becky Hurley B. Date of Delivery

C. Signature Becky Hurley Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:



3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail O.D.

4. Restricted Delivery? (Extra Fee) Yes

7001 0320 0001 3692 9120

PS Form 3811, July 1999

Domestic Return Receipt

102595-00-M-0952

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)**

OFFICIAL USE

7001 0320 0001 3692 9120

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Sent To George Townsend
 Street, Apt. No.,
 or P.O. Box 459
 City, State, ZIP+4
Newberry, FL 32669

PS Form 3800, January 2001

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 David Schwartz, Esq.
 12 SE First St.
 Gainesville, FL 32601

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **S. BRYAN** B. Date of Delivery **7/1/01**
 C. Signature *[Signature]* Agent
 Addressee
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8344

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT**
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8344

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
David Schwartz, Esq.
 Street, Apt. No., or PO Box No.
12 SE First St.
 City, State, ZIP+4
Gainesville, FL 32601

PS Form 3800, February 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Dave Newport, Chair
 Alachua County Commission
 PO Box 2877
 Gainesville, FL 32602-2877

2. Article Number (Copy from service label)

7000 0600 0026 4129 8375

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Paul D. Lincoln 7/12

C. Signature

PAUL D. LINCOLN Agent Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

**U.S. Postal Service
 CERTIFIED MAIL RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8375

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Mr. Dave Newport

Street, Apt. No., or PO Box No.

PO Box 2877

City, State, ZIP+4

Gainesville, FL 32602-2877

PS Form 3800, February 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Rob Luna
 NCFGP
 PO Box 12416
 Gainesville, FL 32604

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8399

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

7-13

C. Signature
 X *Rob Luna* Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only, No Insurance Coverage Provided)	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Recipient's Name (Please Print Clearly) (to be completed by mailer) Rob Luna	
Street, Apt. No., or PO Box No. PO Box 12416	
City, State, ZIP+4 Gainesville, FL 32604	
PS Form 3800, February 2000	

7000 0600 0026 4129 8399

Postmark Here

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Segundo J. Fernandez, Esq.
Oertel, Hoffman, Fernandez & Cole, Inc
PO Box 1110
Tallahassee, FL 32303-1110

2. Article Number (Copy from service label)
7000 0600 0026 4129 8382

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Brian W. Bergesly July 11, 2001

C. Signature

X *Brian W. Bergesly*

Agent
 Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below: Yes No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8382



Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Segundo J. Fernandez, Esq.

Street, Apt. No., or PO Box No.

PO Box 1110

City, State, ZIP+4

Tallahassee, FL 32302-1110

PS Form 3800, February 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John D. Baker, President
 Florida Rock Industries, Inc.
 155 East 21 St.
 Jacksonville, FL 32206

 2. Article Number (Copy from service label)
 7000 0600 0026 4129 8412

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

C. Signature

X Agent Addressee
 D. Is delivery address different from item 1? Yes
 if YES, enter delivery address below: No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes
U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only, No Insurance Coverage Provided)

7000 0600 0026 4129 8412

--	--

Postage	\$	
Certified Fee		Postmark Here
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Mr. John D. Baker, President

Street, Apt. No., or PO Box No.

155 East 21 St.

City, State, ZIP+4

Jacksonville, FL 32206

PS Form 3800, February 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete, item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		A. Received by (Please Print Clearly)	B. Date of Delivery 6-18-01
1. Article Addressed to: David Schwartz, Esq. 12 SE First St. Gainesville, FL 32601		C. Signature X <i>Tamessa Carbia</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
2. Article Number (Copy from service label) 700 0600 0026 4129 8467		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
PS Form 3811, July 1999		Domestic Return Receipt	
		102595-99-M-1789	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
7000 0600 0026 4129 8467	
Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Recipient's Name (Please Print Clearly) (to be completed by mailer) David Schwartz, Esq. Street, Apt. No., or PO Box No. 12 SE First St. City, State, ZIP+4 Gainesville, FL 32601	
PS Form 3800, February 2000 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Received by (Please Print Clearly)	B. Date of Delivery 6/15/01
<p>1. Article Addressed to:</p> <p>Mr. John D. Baker, President Florida Rock Industries, Inc. 155 East 21 Street Jacksonville, Florida 32206</p>	<p>C. Signature: <i>[Handwritten Signature]</i></p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>2. Article Number (Copy from service label) 7000 0600 0026 4129 8542</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
PS Form 3811, July 1999	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8542

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Rec: Mr. John D. Baker, President
 Str: Florida Rock Industries, Inc.
 City: Jacksonville, Florida 32206

PS or Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY						
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<table border="1"> <tr> <td data-bbox="875 157 1222 231">A. Received by (Please Print Clearly) <i>Rob Luna</i></td> <td data-bbox="1222 157 1412 231">B. Date of Delivery <i>6/23/01</i></td> </tr> <tr> <td colspan="2" data-bbox="875 231 1412 304">C. Signature <i>X Rob Luna</i></td> </tr> <tr> <td colspan="2" data-bbox="875 304 1412 367">D. Is delivery address different from item 1? If YES, enter delivery address below:</td> </tr> </table>	A. Received by (Please Print Clearly) <i>Rob Luna</i>	B. Date of Delivery <i>6/23/01</i>	C. Signature <i>X Rob Luna</i>		D. Is delivery address different from item 1? If YES, enter delivery address below:	
A. Received by (Please Print Clearly) <i>Rob Luna</i>	B. Date of Delivery <i>6/23/01</i>						
C. Signature <i>X Rob Luna</i>							
D. Is delivery address different from item 1? If YES, enter delivery address below:							
<p>1. Article Addressed to:</p> <p>Mr. Rob Luna PO Box 12416 Gainesville, FL 32604</p>	<p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>						
<p>2. Article Number (Copy from service label) 700 0600 0026 4129 8580</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>						
<p>PS Form 3811, July 1999</p>	<p>Domestic Return Receipt 102595-99-M-1789</p>						

U.S. Postal Service CERTIFIED MAIL RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>											
<div style="border: 1px solid black; height: 40px;"></div>											
<table border="1"> <tr> <td>Postage</td> <td>\$</td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Total Postage & Fees</td> <td>\$</td> </tr> </table>	Postage	\$	Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		Total Postage & Fees	\$	<p>Postmark Here</p>
Postage	\$										
Certified Fee											
Return Receipt Fee (Endorsement Required)											
Restricted Delivery Fee (Endorsement Required)											
Total Postage & Fees	\$										
<p>Recipient's Name (Please Print Clearly) (to be completed by mailer) Rob Luna</p> <p>Street, Apt. No., or PO Box No. PO Box 12416</p> <p>City, State, ZIP+4 Gainesville, FL 32604</p>											
<p>PS Form 3800, February 2000 See Reverse for Instructions</p>											

7000 0600 0026 4129 8580

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Segundo J. Fernandez, Esq.
Oertel, Hoffman, Fernandez &
Cole
PO Box 1110
Tallahassee, FL 32302-1110

2. Article Number (Copy from service label)
7000 066 0026 4129 8528

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **Katie Scarth** B. Date of Delivery **6-15-01**

C. Signature **X Katie Scarth** Agent Addressee

D. Is delivery address different from item 1? Yes No
If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0660 0026 4129 8528

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Postmark
Here

Re Segundo J. Fernandez, Esq.
 St Oertel, Hoffman, Fernandez & Cole
 Ci PO Box 1110
 Tallahassee, FL 32302-1110

PS

ions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Dave Newport, Chair
 Alachua County Commission
 PO Box 2877
 Gainesville, FL 32602-2877

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

PAUL LINCOLN 6-18-01

C. Signature

[Handwritten Signature]

Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label)

7000 0600 0026 4129 8481

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8481

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Recipient: Mr. Dave Newport, Chair
 Street, Ap Alachua County Commission
 City, State PO Box 2877
 Gainesville, FL 32602-2877

Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Arthur Saarinen
2005 NW 24 St.
Gainesville, FL 32605-3849

2. Article Number (Copy from service label)

7000 0600 0026 4129 8573

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

ART SAARINEN 6/15

C. Signature

[Handwritten Signature] Agent Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
- Registered Return Receipt for Merchandise
- Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

7000 0600 0026 4129 8573

**U.S. Postal Service
CERTIFIED MAIL RECEIPT**
(Domestic Mail Only, No Insurance Coverage Provided)

[Redacted area]

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
Mr. Arthur Saarinen
Street, Apt. No., or PO Box No.
2005 NW 24 St
City, State, ZIP+4
Gainesville, FL 32605-3849

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8368

[Redacted area]

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

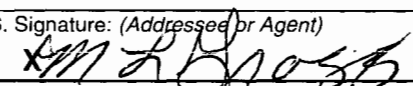
Postmark
Here

Recipient's Name *(Please Print Clearly) (to be completed by mailer)*
Mr. Arthur Saarinen

Street, Apt. No., or PO Box No.
2005 NW 24 St.

City, State, ZIP+4
Gainesville, FL 32605-3849

Is your RETURN ADDRESS completed on the reverse side?

SENDER: ■ Complete items 1 and/or 2 for additional services. ■ Complete items 3, 4a, and 4b. ■ Print your name and address on the reverse of this form so that we can return this card to you. ■ Attach this form to the front of the mailpiece, or on the back if space does not permit. ■ Write "Return Receipt Requested" on the mailpiece below the article number. ■ The Return Receipt will show to whom the article was delivered and the date delivered.		I also wish to receive the following services (for an extra fee): 1. <input type="checkbox"/> Addressee's Address. 2. <input type="checkbox"/> Restricted Delivery Consult postmaster for fee.
3. Article Addressed to: John D. Baker, Pres Fla. Rock Ind 155 E. 21st St. Jacksonville, FL 32206	4a. Article Number 2031 392 012	4b. Service Type <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Certified <input type="checkbox"/> Express Mail <input type="checkbox"/> Insured <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> COD
5. Received By: (Print Name)	7. Date of Delivery	
6. Signature: (Addressee or Agent) 	8. Addressee's Address (Only if requested and fee is paid)	

Thank you for using Return Receipt Service.

Z 031 392 012

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to	John Baker	
Street & Number	Fla Rock	
Post Office, State, & ZIP Code	Fl	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee	Extension	
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date	10-6-99	
	PSD-FI-228 0010087	

PS Form 3800, April 1995

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John D. Baker, President
 Florida Rock Industries, Inc.
 155 East 21 Street
 Jacksonville, Florida 32206

2. Article Number (Copy from service label)

2 341 355 337

PS Form 3811, July 1999

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

7/21/00

C. Signature

x M. R. Gross

- Agent
 Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

Domestic Return Receipt

102595-99-M-1789

2 341 355 337

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
<u>John Baker, Pres.</u>	
Street & Number	
<u>155 E. 21 St.</u>	
Post Office, State, & ZIP Code	
<u>Jax, Fl 32206</u>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	
<u>Fl. Rock Industries</u> <u>7/18/00</u>	

PS Form 3800, April 1995

Fold at line over top of envelope to return address

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
 ■ Complete items 1 and/or 2 for additional services.
 ■ Complete items 3, 4a, and 4b.
 ■ Print your name and address on the reverse of this form so that we can return this card to you.
 ■ Attach this form to the front of the mailpiece, or on the back if space does not permit.
 ■ Write "Return Receipt Requested" on the mailpiece below the article number.
 ■ The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):
 1. Addressee's Address
 2. Restricted Delivery
 Consult postmaster for fee.

3. Article Addressed to:
 Fred W. Cohrs, VP
 Fla. Rock Industries
 P O BOX 4667
 Jacksonville, FL 32201

4a. Article Number
 Z 333 618 136

4b. Service Type
 Registered Certified
 Express Mail Insured
 Return Receipt for Merchandise COD

7. Date of Delivery
 9-10-99

5. Received By: (Print Name)
 DeHoyos #9

8. Addressee's Address (Only if requested and fee is paid)

6. Signature: (Addressee or Agent)
 X

Thank you for using Return Receipt Service.

Z 333 618 136

US Postal Service
Receipt for Certified Mail
 No Insurance Coverage Provided.
 Do not use for International Mail (See reverse)

Sent to		Fred Cohrs
Street & Number		FLA. ROCK IND
Post Office, State, & ZIP Code		Jax FL
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to Whom & Date Delivered		
Return Receipt Showing to Whom, Date, & Addressee's Address		
TOTAL Postage & Fees	\$	
Postmark or Date		9-8-99

PS Form 3800 April 1995

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Rob Luna
 PO Box 12416
 Gainesville, FL 32605

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **Rob Luna** B. Date of Delivery **8-30-2001**

C. Signature **X Rob Luna** Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

2. Article Number (Copy from service label)

7000 0600 0026 4129 8126

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8146

Mr. Rob Luna

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Street, Apt. No., or PO Box No.
 PO Box 12416
 City, State, ZIP+4
 Gainesville, FL 32605

PS Form 3800, February 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

James J. Konish, Esquire
 FPLW
 PO Box 2309
 Gainesville, FL 32602-2309

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **LISA NICHOLSON** B. Date of Delivery **8-27-01**
 C. Signature **Lisa Nicholson** Agent Addressee
X Registered Insured Mail C.O.D.
 D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.
 4. Restricted Delivery? (Extra Fee) Yes

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8153

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

James J. Konish, Esquire

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

7000 0600 0026 4129 8153

Recipient's Name (Please Print Clearly) (to be completed by mailer)
 FPLW
 Street, Apt. No., or PO Box No.
 PO Box 2309
 City, State, ZIP+4
 Gainesville, FL 32602-2309

See Reverse for Instructions

PS Form 3800, February 2000

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. John D. Baker, President
 Florida Rock Industries, Inc.
 155 East 21 Street
 Jacksonville, Florida 32206

2. Article Number (Copy from service label)

7000 0600 0026 4129 8139

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

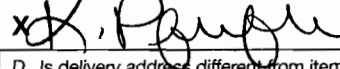
COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

B. Date of Delivery

8/24/01

C. Signature


 Agent AddresseeD. Is delivery address different from item 1? YesIf YES, enter delivery address below: No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes**U.S. Postal Service
CERTIFIED MAIL RECEIPT***(Domestic Mail Only; No Insurance Coverage Provided)*

Mr. John D. Baker, President

Postage \$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees \$

Postmark
Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Florida Rock Industries, Inc.

Street, Apt. No., or PO Box No.

155 East 21 Street

City, State, ZIP+4

Jacksonville, FL 32206

PS Form 3800, February 2000

See Reverse for Instructions

7000 0600 0026 4129 8139

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Dave Newport, Chair
 Alachua County Commission
 PO Box 2877
 Gainesville, FL 32602-2877

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8160

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

J. Crow 8-27-01

C. Signature Agent
 Addressee

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8160

Mr. Dave Newport, Chair

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
 Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Alachua County Commission

Street, Apt. No., or PO Box No.

PO Box 2877

City, State, ZIP+4

Gainesville, FL 32602-2877

PS Form 3800, February 2000

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Arthur Saarinen
 2005 NW 24 St.
 Gainesville, FL 32605-3849

2. Article Number (Copy from service label)
 7000 0600 0026 4129 8122

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

A. SAARINEN

8/24

C. Signature

X *A. Saarinen*

 Agent

 Addressee

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

 Certified Mail

 Express Mail

 Registered

 Return Receipt for Merchandise

 Insured Mail

 C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0026 4129 8122

Mr. Arthur Saarinen

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)

Street, Apt. No., or PO Box No.

2005 NW 24 St.

Gainesville, FL 32605-3849

PS Form 3800, February 2000

See Reverse for Instructions

