

DEP ROUTING AND TRANSMITTAL SLIP

TO: (NAME, OFFICE, LOCATION)

1. Greg DeAngelo
2. DERM-NSR

3. _____
4. MS #5500
5. _____

PLEASE PREPARE REPLY FOR:

- SECRETARY'S SIGNATURE
- DIV/DIST DIR SIGNATURE
- MY SIGNATURE
- YOUR SIGNATURE
- DUE DATE _____

ACTION/DISPOSITION

- DISCUSS WITH ME
- COMMENTS/ADVISE
- REVIEW AND RETURN
- SET UP MEETING
- FOR YOUR INFORMATION
- HANDLE APPROPRIATELY
- INITIAL AND FORWARD
- SHARE WITH STAFF
- FOR YOUR FILES

COMMENTS:

Time Extension
request from
Florida Rock
Newberry for
Permit No.
0010087-006-A2

FROM:

Rita Smith

DATE:

6-10-03

PHONE:

804-3237

FLORIDA ROCK INDUSTRIES INC

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



June 9, 2003

Mr. Christopher Kirts, P.E.,
District Air Program Administrator
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7590

RE: Request for extension of construction permit no. 0010087-006-AC
Florida Rock Industries, Inc.—TS Baker Cement Plant
Facility ID 0010087

Dear Mr. Kirts:

As allowed by Rule 62-4.080(3), F.A.C., Florida Rock Industries requests a modification of the above-referenced permit to extend the expiration date until October 30, 2003, while the application for revision of the Title V permit is processed by the FDEP. Reasonable assurance of compliance with construction-permit emission limits and with MACT—Subpart LLL emission limits has been demonstrated by emission tests at the production rate allowed by the construction permit while firing coal and tires.

Please contact me at (352) 472-4722, ext. 102, or Henry Gotsch at (352) 472-4722, ext. 121, if you have any questions or need additional information.

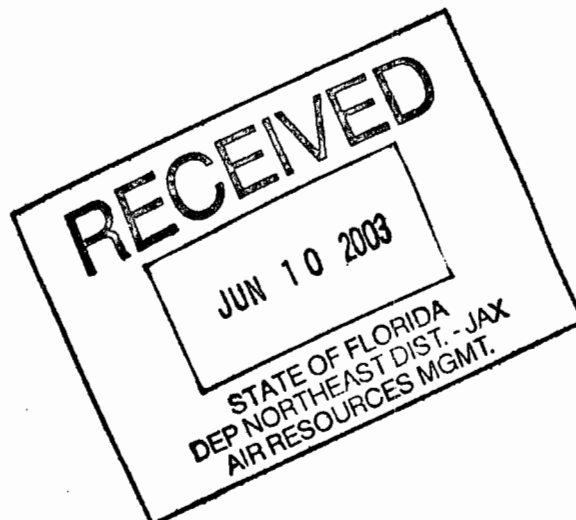
Sincerely,

FLORIDA ROCK INDUSTRIES, INC.

A handwritten signature in black ink, appearing to read 'Cary O. Cohrs'.

Cary O. Cohrs
Vice-President—Operations

cc: Tom Baker II



7001 0320 0001 3692 5634

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

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees		
Sent To	Mr. John D. Baker, President	
Street, Apt. No., or PO Box No.	Florida Rock Industries, Inc. 155 East 21 Street	
City, State, ZIP+4	Jacksonville, Florida 32206	

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:

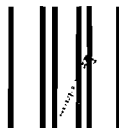
Mr. John D. Baker, President
 Florida Rock Industries, Inc.
 155 East 21 Street
 Jacksonville, Florida 32206

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)	B. Date of Delivery 7/2/03
C. Signature x B. Blankenship	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
D. Is delivery address different from item 1? If YES, enter delivery address below:	<input type="checkbox"/> Yes <input type="checkbox"/> No
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

2 7001 0320 0001 3692 5634

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd , MS 5505
Tallahassee FL 32399-2400

RECEIVED
JUL 11 2003
BUREAU OF AIR REGULATION

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

7001 0320 0001 3692 5627

OFFICIAL USE

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

Postmark
Here

Sent To
Cary O. Cohrs
 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:

 Mr. Cary O. Cohrs
 Vice President of Operations
 Florida Rock Industries, Inc.
 Post Office Box 459
 Newberry, FL 32669

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) **Dennis Coey** B. Date of Delivery **7-2-03**
 C. Signature **[Signature]** Agent Addressee
 D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

Cement Group
 3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.
 4. Restricted Delivery? (Extra Fee) Yes

2 7001 0320 0001 3692 5627

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Dept. of Environmental Protection
Division of Air Resources Mgt.
Bureau of Air Regulation, NSR
2600 Blair Stone Rd., MS 5505
Tallahassee, FL 32399-2400

RECEIVED

JUL 07 2003

BUREAU OF AIR REGULATION



FLORIDA ROCK INDUSTRIES INC

Mining, Ready Mix Concrete, and Construction Products

Becky } FYF
Clair }
Dotty }

from: Howard
10/10

October 3, 2001

RECEIVED



OCT 05 2001

DIVISION OF AIR
RESOURCES MANAGEMENT

Mr. Howard Rhodes, Director
Division of Air Resources Management
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

RECEIVED

OCT 10 2001

BUREAU OF AIR REGULATION

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

TO FRI
extension file
W

Dear Howard:

I am writing to express my concern regarding the attached letter from Chris Bird, Director of the Alachua County Environmental Protection Department to Mr. Winston Smith of EPA, Region 4, Atlanta, regarding the proposed Title V Permit for the Florida Rock Industries Thomas S. Baker Portland Cement Plant located in Newberry, Florida. As you know, Alachua County filed for an administrative hearing challenging our Title V Permit but withdrew their challenge after certain assurances were incorporated into the permit. In spite of withdrawing their challenge at the state level, Alachua County has seen fit to express "...its specific concerns in hopes that they will be addressed [at EPA's insistence] in the final version of the Title V Permit."

I've discussed the attached letter with Mr. Greg Worley of Winston Smith's office and was informed that the only meritorius concern expressed by Alachua County, and indirectly at that, is related to the air construction permit condition that the gases exiting the kiln be maintained at a minimum temperature of 1400°F for at least one hour before tire derived fuel firing commences. Evidently, this condition was inadvertently left out of the Draft Title V Permit. Worley stated that he will suggest that this permit condition be included in the Title V Permit as it was an air construction permit condition. Certainly, Florida Rock has no objection to this. Worley stated that the other concerns addressed by Alachua County were totally without rule basis.

The concern I would like to express to you as an operator of a permitted air emission facility in Alachua County, is that a county with such a lack of understanding of

Mr. Howard Rhodes
October 3, 2001

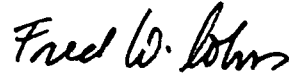
Page 2

Title V Permit requirements and/or with such an overzealous attempt to impose permit conditions which have no rule basis in a Title V Permit is asking your Department for authority to establish a state approved air program in the county. I trust you'll take matters such as this into consideration when evaluating the merits of Alachua County's request.

If you have any comments regarding this matter, please feel free to contact me.

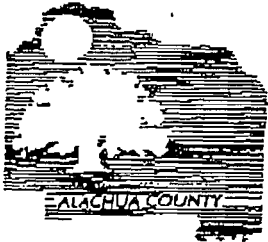
Very truly yours,

FLORIDA ROCK INDUSTRIES, INC.



Fred W. Cohrs
Vice President

FWC/jm
attachment



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

Suncom: 651-6800

Home Page: www.co.alachua.fl.us

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John J. Mousa
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Manager
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Robert L. Norton
Natural Resources
Supervisor
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Barbara J. Pierce
Administrative Assistant
bpierce@co.alachua.fl.us

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

01 SEP 21 PM 2 5
STATE OF FLORIDA
DEP - NE DISTRICT
JACKSONVILLE

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.

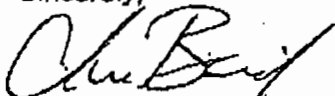
4) The Proposed Title V permit states that manual stack tests for particulate, carbon monoxide, VOC, beryllium and sulfuric acid mist should be performed while firing both fuels (70% to 100% coal and 0 to 30% tires) and while the continuous monitoring systems are functioning properly. Alachua County 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