

TEST 12/21/00



KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
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PROJECT 263-00-09

FAX TRANSMITTAL FORM

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FROM: John Koogler
DATE: 2/28/01 SENT BY: JK

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REMARKS: Clear/Al - following are summaries
of completed emission test at Ricker.
Call if there are questions or if a
wavier is still required
Thanks
John

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**VOLATILE ORGANIC COMPOUNDS,
NITROGEN OXIDES AND CARBON
MONOXIDE EMISSION MEASUREMENTS**

CEMENT KILN

**CSR RINKER MATERIALS CORPORATION
MIAMI, FLORIDA**

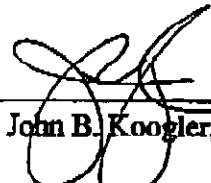
PERMIT NO. 0250014-002-AC

DECEMBER 21, 2000

**KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 32609
(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

2/6/01

Date



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1.0 INTRODUCTION

CSR Rinker Materials Corporation owns and operates a preheater/precalciner Portland cement plant at 1200 NW 137th Avenue, Miami, Dade County, Florida. On December 21, 2000, Koogler & Associates Environmental Services of Gainesville, Florida, conducted volatile organic compounds (VOC), nitrogen oxides (NO_x), and carbon monoxide (CO) emission measurements on the cement kiln in accordance with EPA Methods 25A, 7E, and 10 (40 CFR 60, Appendix A). The purpose of the testing was to demonstrate initial compliance with the VOC emission limiting standards set forth in Permit No. 0250014-002-AC and to demonstrate continuing compliance with the NO_x and CO emission limits.

Prior to the test date, the Metropolitan Dade County Environmental Resources Management in Miami, Florida, was notified of the scheduled initial air emission performance tests.

During the period of testing, the plant was operating normally at a preheater feed rate of 185.4 tons per hour and a coal firing rate of 11.6 tons per hour. The VOC emission rate averaged 11.87 pounds per hour; the NO_x emission rate averaged 322.75 pounds per hour; and the carbon monoxide emission rate averaged 117.50 pounds per hour. The permit limits the VOC emission rate to 13.7 pounds per hour,

the NOx emission rate to 671 pounds per hour, and the CO emission rate to 412 pounds per hour.

Based upon the data presented herein, it can be concluded that during the period of testing on December 21, 2000, the cement kiln was operating in compliance with the VOC, NOx, and CO emission limiting standards set forth in Permit 0250014-002-AC.

2.0 LOCATION OF SAMPLING PORTS

The locations of the sampling points are shown in Figure 1. Stack gas flow rate measurements were made through four sampling ports located 90 degrees to one another in the 136.5-inch diameter stack. The ports are located 203.5 feet (18.5 diameters) above the point where the stack gas enters the stack and 101.7 feet (9.3 diameters) below the top of the stack. A total of 12 points were used for the velocity traverses. The points were located in accordance with criteria established by EPA Test Method 1 (40 CFR 60, Appendix A).

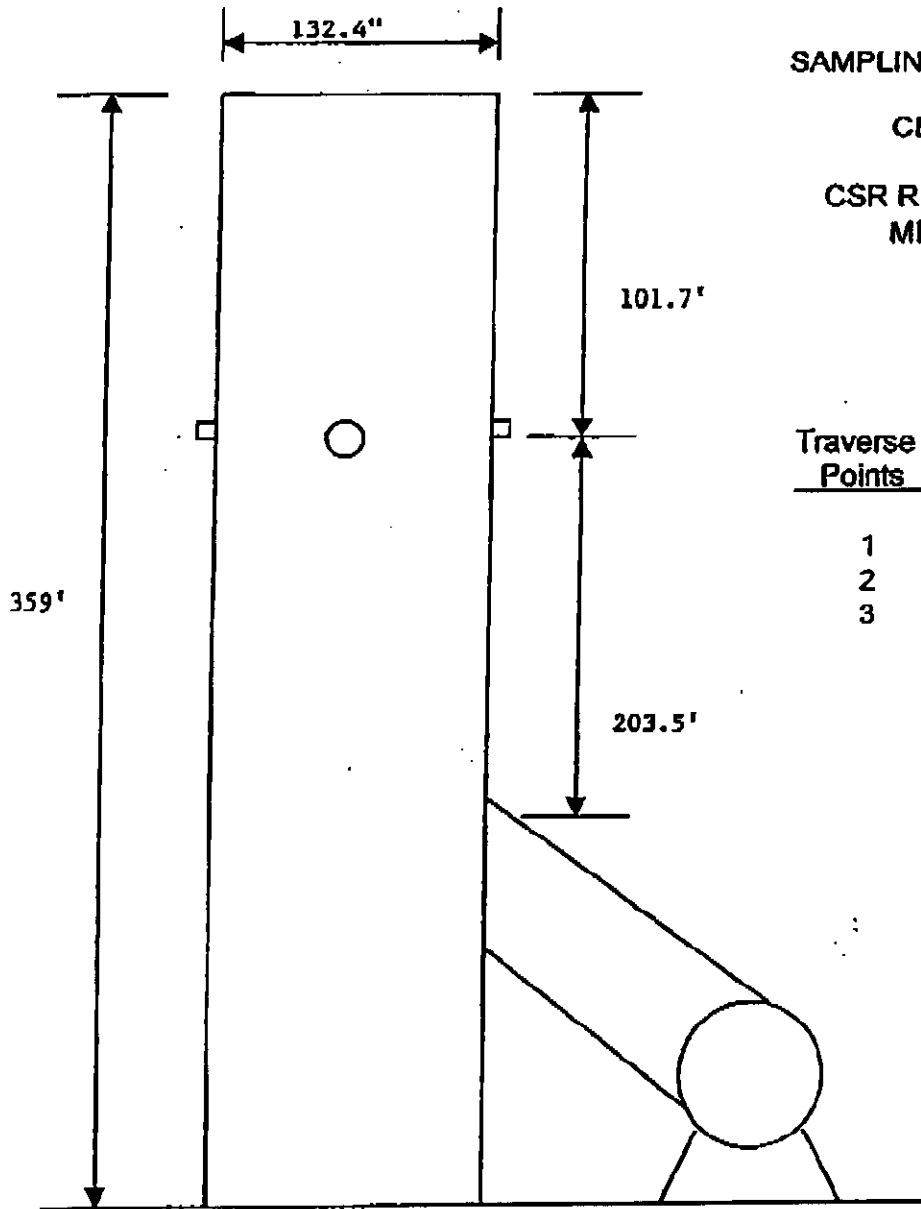
Samples for measurements of NO_x (Method 7E), CO (Method 10) and VOCs (Method 25A) were collected from a single point near the center of the stack.

FIGURE 1

SAMPLING POINT LOCATIONS

CEMENT PLANT

**CSR RINKER MATERIALS
MIAMI, FLORIDA**



<u>Traverse Points</u>	<u>Distance from Inside Stack Wall</u>
1	6.01
2	19.9
3	40.4

3.0 FIELD AND ANALYTICAL PROCEDURES

The VOC, NO_x and CO emission measurements were made using EPA Methods 25A, 7E and 10, respectively. The sample of stack gas for the continuous analyzers was collected from a single point near the center of the stack and transported to a heated manifold through a heated teflon sample line. The sample gas stream was split with the fraction for NO_x analyses passing through a cold trap to remove water vapor before the gas stream was introduced to the analyzer. The gas sample for carbon monoxide analysis was passed through an ascarite column to remove moisture and CO₂. The gas sample for VOC analysis was transferred, wet, through a heated sample line to the VOC analyzer.

The VOC concentrations were measured as propane (v/v, wet basis) with a TEI Model 51 Total Hydrocarbon Analyzer (0-30 ppm C₃H₈ range). The analyzer's analog voltage responses to the stack gas were compared to those of certified calibration gases. All responses were digitized at the rate of once per second, averaged by the minute, scaled as ppm C₃H₈ and recorded with a Telog Data Logger Model 3307.

All EPA test methods are described in 40 CFR 60, Appendix A and have been adopted by reference by FDEP by Rule 62-297.401, F.A.C.

4.0 SUMMARY OF RESULTS

Results of the VOC, NOx, and CO emission measurements are summarized in Table 1. During the test period, the VOC emission rate averaged 11.87 pounds per hour as measured by EPA Method 25A; the NOx emission rate averaged 322.75 pounds per hour as measured by EPA Method 7E; and the CO emission rate averaged 117.50 pounds per hour as measured by EPA Method 10. The permit limits the VOC emission rate to 13.7 pounds per hour; the NOx emission rate to 671 pounds per hour; and the CO emission rate to 412 pounds per hour.

Based upon the data presented herein, it can be concluded that during the period of testing on December 20, 2000, the cement kiln was operating in compliance with the VOC, NOx and CO standards set forth in Permit 0250014-002-AC.

Emission calculations, field and laboratory data sheets, gas certifications, and a list of project participants are included in the Appendix of this report.

TABLE 1

SUMMARY OF NMHC, CO, NOX EMISSION MEASUREMENTS

Company: Rinker Materials
 Source: Cement Kiln
 Date: December 21, 2000

RUN NO.	NMHC		CO		NOX	
	PPM	LB/HR	PPM	LB/HR	PPM	LB/HR
1	8.79	11.33	160.96	113.70	266.61	309.32
2	8.97	12.42	186.61	128.88	244.46	306.92
3	8.76	11.86	149.39	109.91	291.30	352.02
AVG.	8.85	11.87 (1)	165.65	117.50	267.46	322.75

(1) AS PROPANE

Calculations: CO, SO₂, NOX

$$\text{LB/HR} = (\text{DSCFM}) \times 60 \text{ MIN/HR} \times (\text{CONC. PPM}) \times \text{MW}/385 \times 10^{-6}$$

Calculations: NMHC (1)

$$\text{LB/HR} = (\text{SCFM}) \times 60 \text{ MIN/HR} \times (\text{CONC. PPM}) \times \text{MW}/385 \times 10^{-6}$$

RUN	(DSCFM)	(SCFM)
1	161818	187563
2	175108	201423
3	168547	196630

MW (NMHC) = 44 (AS PROPANE)

MW (CO) = 28

MW (NOX) = 46

**VISIBLE EMISSIONS
OBSERVATIONS**

CEMENT PLANT

**CSR RINKER MATERIALS
MIAMI, FLORIDA**

**PERMIT NO. 0250014-003-AV
EMISSION UNITS 001, 002, 003, 005,
006, 012, 013**

**TEST DATE: DECEMBER 22, 2000
REPORT SUBMITTED: FEBRUARY 2, 2001**

**KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 33609
(352) 377-5822**



**TABLE 1
RESULTS OF VISIBLE EMISSIONS OBSERVATIONS**

**CSR RINKER MATERIALS
MIAMI, FLORIDA**

DECEMBER 22, 2000

EMISSION UNIT	SOURCE	PERMITTED OPACITY LIMIT (%)	OBSERVED OPACITY (%)
001	Finish Mill No. 1	20	0
002	Finish Mill No. 2	20	0
003	Finish Mill No. 3	20	0
005	Mortar Packhouse (West)	10	0
	Dust Arrestor-Alleviator	10	0
006	Cement Packhouse (East)	10	0
	Dust Arrestor-Alleviator	10	0
012	Finish Mill No. 4	20	0
	Finish Mill Exhaust	20	0
013	Finish Mill No. 5	20	0
	Finish Mill Exhaust	20	0

**SULFUR DIOXIDE, NITROGEN OXIDES AND
CARBON MONOXIDE EMISSION MEASUREMENTS**

KILN/RAW MILL/CLINKER COOLER

**CSR RINKER MATERIALS CORPORATION
MIAMI, FLORIDA**

PERMIT NO. 0250014-002-AC

TEST DATE: OCTOBER 9, 2000

**KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 32609
(352) 377-5822**



1.0 INTRODUCTION

CSR Rinker Materials Corporation owns and operates a preheater/precalciner Portland cement plant at 1200 NW 137th Avenue, Miami, Dade County, Florida. On October 9, 2000, Koogler & Associates Environmental Services of Gainesville, Florida, conducted sulfur dioxide, nitrogen oxides, and carbon monoxide emission measurements on the kiln/raw mill/cooler in accordance with EPA Methods 6C, 7E, and 10 (40 CFR 60, Appendix A). The purpose of the testing was to demonstrate initial compliance with the emission limiting standards set forth in Permit No. 0250014-002-AC.

Prior to the test date, the Metropolitan Dade County Environmental Resources Management in Miami, Florida, was notified of the scheduled initial air emission performance tests.

During the period of testing, the plant was operating normally at a preheater feed rate of 172.3 tons per hour and a clinker production rate of 103.4 tons per hour. The coal feed rate averaged 13.0 tons per hour which is equivalent to a heat input rate of about 325 MMBtu/hr. The permitted preheater feed rate and clinker production rates are 220 tons per hour and 137 tons per hour, respectively, on a 24-hour basis and limits the heat input rate to 437 MMBtu/hr. The sulfur dioxide emission rate averaged 2.85 pounds per hour, the nitrogen oxides emission rate

averaged 339.19 pounds per hour; and the carbon monoxide emission rate averaged 249.97 pounds per hour. The permit limits the sulfur dioxide emission rate to 228 pounds per hour, the nitrogen oxides emission rate to 497 pounds per hour, and the carbon monoxide emission rate to 311 pounds per hour at the tested operating rate.

Based upon the data presented herein, it can be concluded that during the period of testing on October 9, 2000, the kiln/raw mill/cooler were operating in compliance with the SO₂, NO_x, and CO standards set forth in Permit 0250014-002-AC.

4.0 SUMMARY OF RESULTS

Results of the sulfur dioxide, nitrogen oxides and carbon monoxide emission measurements are summarized in Table 1. During the test period, the sulfur dioxide emission rate averaged 2.85 pounds per hour as measured by EPA Method 6C, the nitrogen oxides emission rate averaged 339.19 pounds per hour as measured by EPA Method 7E and the carbon monoxide emission rate averaged 249.97 pounds per hour as measured by EPA Method 10. The permit limits the sulfur dioxide emission rate to 0.7 pounds per MMBtu or to 228 pounds per hour at test conditions, the nitrogen oxides emission rate 1.53 pounds per MMBtu (497 pounds per hour) and carbon monoxide emission rate to 3.01 pounds per ton of clinker (311 pounds per hour).

Based upon the data presented herein, it can be concluded that during the period of testing on October 9, 2000, the kiln/raw mill/cooler were operating in compliance with the SO₂, NO_x and CO standards set forth in Permit 0250014-002-AC.

Emission calculations, field and laboratory data sheets, plant information, equipment calibrations, and a list of project participants are included in the Appendix of this report.

TABLE 1
SUMMARY OF CO, SO₂, AND NO_x EMISSION MEASUREMENTS

CSR RINKER
KILN/RAW MILL/COOLER
OCTOBER 9, 2000

Run No.	CO		SO ₂		NO _x	
	ppm	lb/hr	ppm	lb/hr	ppm	lb/hr
1	302.36	253.99	1.83	1.66	249.24	336.45
2	321.73	273.53	2.48	3.34	236.24	320.52
3	263.16	222.39	2.92	3.54	274.20	360.59
Avg	295.75	249.97	2.41	2.85	253.23	339.19

Calculations: CO, SO₂, NO_x

$$\text{lb/hr} = \text{ft}^3/\text{min} \times 60 \text{ min/hr} \times (\text{conc. ppm}) \times \text{MW}/385 \times 10^{-6}$$

Run	(dscfm)
1	190,765
2	194,765
3	190,613

**PARTICULATE MATTER EMISSION
MEASUREMENTS AND
VISIBLE EMISSIONS OBSERVATIONS**

CEMENT KILN/RAW MILL/CLINKER COOLER

**CSR RINKER MATERIALS CORPORATION
MIAMI, FLORIDA**

**AIRS I.D. NO. 0250014
PERMIT NO. 0250014-002-AC**

SEPTEMBER 29, 2000

**KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 32609
(352) 377-5822**



1.0 INTRODUCTION

CSR Rinker Materials Corporation owns and operates a preheater/precalciner Portland cement plant located at 1200 N.W. 137th Avenue, Miami, Dade County, Florida. On September 29, 2000, Koogler & Associates Environmental Services of Gainesville, Florida, conducted particulate matter (PM/PM10) emission measurements and visible emissions observations on the kiln/raw mill/cooler in accordance with EPA Methods 5 and 9 (40 CFR 60, Appendix A). The purpose of the testing was to satisfy the emission limiting requirements of Permit No. 0250014-005-AC.

Prior to the test date, the Metropolitan Dade Environmental Resources Management (DERM) was notified of the test schedule and testing methods.

During the test period, the kiln was operating at an average preheater feed rate of 200.6 tons per hour. The PM/PM10 stack gas concentration averaged 0.0012 grains per dry standard cubic foot. The corresponding PM/PM10 emission rate averaged 2.03 pounds per hour. The permit limits the preheater feed rate to 220 tons per hour and the emission rate of PM/PM10 to 44 pounds per hour, or to 0.2 pounds per ton of preheater feed.

Visible emissions observations were conducted for a 3-hour period. During the observation periods, no visible emissions were observed. The permit limits the opacity of emissions from the kiln/raw mill/cooler to 10 percent.

Based upon the data presented herein, it can be concluded that during the period of testing on September 29, 2000, the kiln/raw mill/cooler were operating in compliance with the PM/PM10 emissions limiting standard and the visible emissions standard set forth in Permit No. 0250014-002-AC.

4.0 SUMMARY OF RESULTS

Results of the particulate matter emission measurements conducted on September 29, 2000, are summarized in Table 1. The PM/PM10 stack gas concentrations ranged from 0.0008 to 0.0020 grains per dry standard cubic foot and averaged 0.0012 grains per dry standard cubic foot. The corresponding PM/PM10 emission rate averaged 2.03 pounds per hour. The stack gas flow averaged 202,343 dscfm at a temperature of 291°F and a stack gas moisture of 12.1 percent.

Visible emissions observations were conducted for a 3-hour period. During the observation period, no visible emissions were observed. The permit limits the opacity of emissions from the kiln/raw mill/cooler to 10 percent.

Based upon the data presented herein, it can be concluded that during the period of testing on September 29, 2000, the kiln/raw mill/cooler were operating in compliance with the PM/PM10 emission limiting standard and the visible emissions standard set forth in Permit No. 0250014-002-AC.

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

TABLE 1

SUMMARY OF SOURCE EMISSION TEST DATA

RINKER / MIAMI, FL.
CEMENT KILN
SEPT 29, 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	200.6	188,560	249	14.7	0.0020	3.16
2	200.6	191,866	249	13.4	0.0008	1.30
3	200.6	226,605	376	8.2	0.0008	1.63
Average	200.6	202,343	291	12.1	0.0012	2.03

Allowable Particulate Matter Emission Rate - lbs/Hr

**VISIBLE EMISSIONS
OBSERVATIONS**

CEMENT PLANT

**CSR RINKER MATERIALS CORPORATION
MIAMI, FLORIDA**

PERMIT NO. 0250014-002-AC

**SEPTEMBER 21, 22, 23, 24,
25, 27, 28 AND 29, 2000**

**KOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 N.W. 13TH STREET
GAINESVILLE, FLORIDA 33609
(352) 377-5822**



**TABLE 1
RESULTS OF VISIBLE EMISSIONS OBSERVATIONS**

**CSR RINKER MATERIALS CORPORATION
MIAMI, FLORIDA**

SEPTEMBER 21, 22, 23, 24, 25, 27, 28 AND 29, 2000

EMISSION UNIT	I.D. NO.	SOURCE	PERMITTED OPACITY LIMIT (%)	AVERAGE OPACITY LIMIT (%)
016		Material Processing	10	0
		Crusher	15	0
017	BF2 K22	Soil Bin	5	0
	BF1 K21	Transfer	5	0
	BF1 K22	Add Bin	5	0
	BF2 391	Raw Meal Silo	5	0
	BF1 391	Meal Transfer	5	0
	BF1 431	PM Feed Mill Transfer	5	0
	BF2 431	PM Feed Mill Transfer	5	0
019	BF2 491	Clinker Storage Silo	5	0
	BF1 491	Clinker Pan Conveyor	5	0
	BF3 491	Clinker Retrofit Silo	5	0
	BF1 510	Clinker Discharge Transfer	5	0
	BF1 590	Cement Storage Silo	5	0
	BF2 590	Cement Storage Silo	5	0
020	BF2 536	Feed Bin	5	0
		Coal Handling & Storage	20	0
	BF1 691	Fuel Bin	5	0

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FEB 09 2001

February 8, 2001

BUREAU OF AIR REGULATION

VIA HAND DELIVERY

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

Re: Request for Extension of Time to File Petition for Administrative Hearing
Draft 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.

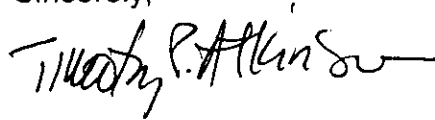
On behalf of Florida Rock Industries, Inc., and pursuant to Rule 28-106.111, Florida Administrative Code, we hereby file this request for an extension of time to file a petition for administrative hearing with respect to the Draft Air Construction Permit Modification and with respect to the Draft Title V Permit, both referenced above, for an additional 30 days, up to and including Thursday, March 1, 2001. The applicant needs additional time to review the draft permits, which are quite lengthy and detailed.

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

Douglas W. Beason, Assistant General Counsel
February 8, 2001
Page 2

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

Sincerely,

A handwritten signature in black ink that reads "Timothy P. Atkinson". The signature is written in a cursive style with a long horizontal flourish at the end.

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, P.E., Ph.D.