



RTP ENVIRONMENTAL ASSOCIATES, INC.®

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239 U.S. Highway 22 East
Green Brook, New Jersey 08812-1909
(www.rtpenv.com)

(732) 968-9600
Fax: (732) 968-9603

July 26, 2005

James K. Pennington, P.E.
Administrator, North Permitting Section
Division of Air Resource Management
Department of Environmental Protection
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

RECEIVED

JUL 26 2005

BUREAU OF AIR REGULATION

Re: Comments on Final Permit
DEP File No. 0530021-009-AC (PSD-FL-351)
Proposed New Kiln (Cement Plant #2) at the
Florida Crushed Stone Brooksville Facility
Hernando County, Florida *053 0021-012-AC*

Dear Mr. Pennington:

Florida Crushed Stone has reviewed the Department's Final Determination and final permit for the proposed cement plant in Brooksville. We appreciate the Department's efforts in issuing this permit.

Based on our review, we have identified several minor administrative errors in the final permit. We believe these minor errors should be corrected as administrative changes to the final permit. Our specific comments are as follows:

Page 2, Facility Description, Paragraph 2

In the Facility Description, second paragraph, the next to the last sentence is incorrect. The annual processing capacity for coal and petroleum coke is mistakenly listed as 131,400 tons. The correct value is 165,000 tons, as authorized in Section III, Subsection C, Condition 2 on page 20.

In the Final Determination (page 2), the Department noted that "The Facility Description section contents are intended as information only", and thus do not establish permit limits. However, in the final permit, the last sentence in the Facility Description states that the "new raw material and handling storage shall not process more than 225 tons per hour of raw material (1,971,000 tons per year)". This language in the Facility Description certainly appears to establish mandatory limits. To avoid confusion over this language and potential disputes in the future, the Facility Description should be corrected to state that the raw material handling and storage system has a nominal processing capacity of 225 tons per hour (1,971,000 tons per year).

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Page 7, Section II, Condition 11.b

In the Final Determination (page 3), the Department agreed that solid fuel piles could be stored outside. Accordingly, in the final permit (Condition 11.b.), the list of "additional reasonable precautions" indicates that coal and petroleum coke do not need to "be stored under roof." However, in Condition 11.b, it appears that tires were inadvertently omitted in the first bullet. This Condition should be amended to clarify that waste tires also do not need to be stored under roof.

The Department's rules in Chapter 62-711, F.A.C., govern the storage of waste tires and those rules do not require waste tires to be stored under roof. Waste tires should not affect fugitive particulate emissions.

Page 11, Section III, Subsection A, Condition 2a

The heat content for tires should be 117 MMBtu/hr, rather than 58.5 MMBtu/hr, to match the change in firing rate from 15% to 30%.

Page 11, Section III, Subsection A, Condition 2b

The limit for coal and/or petroleum coke should be 20 tons per hour, rather than 15 tons per hour, to match the change made at page 20, Section III, Subsection C, Condition 2.

Page 13, Section III, Subsection A, Condition 11

The phrase "any change in the feed or fuels" should be followed by "outside of the normal range of monitored parameters".

Page 16, Section III, Subsection A, Condition 24

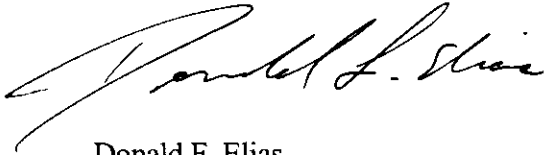
The Final Determination states "The Department agrees [with Florida Crushed Stone's comments] and will revise the language of this condition." However, the language in the final permit does not reflect the Department's agreement. Condition 24 should be revised to read as follows:

The owner or operator shall maintain records of the quantity and representative analysis of fuels purchased, and such records shall include the sulfur content and heat content of the fuel. For coal, natural gas, fuel oil, and propane, the records also shall include the proximate and ultimate analyses.

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Thank you again for your time and efforts. Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald F. Elias". The signature is fluid and cursive, with a large initial "D" and "E".

Donald F. Elias
Principal

cc: T. Vielhauer
B. Bull
C. Allen
S. Benyon
M. Vardeman
D. Dee
M. Podrez
Project File: RMBR

From: Origin ID: (732)968-9600
 Mary Jordan
 RTP ENVIRONMENTAL ASSOCIATES, INC
 239 US HIGHWAY 22 EAST

GREEN BROOK, NJ 08812

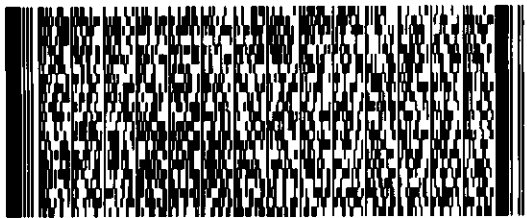


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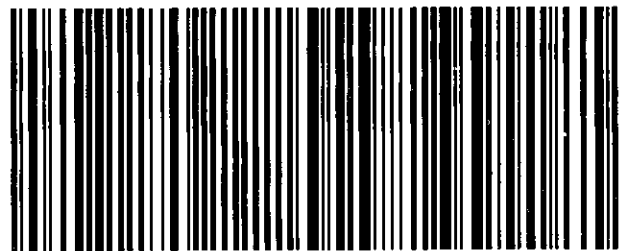
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