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January 10, 1991

Mr. Barry Andrews  
Bureau of Air Regulation  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Re: DER File No. AC29-185895  
LaFarge Silos

Dear Mr. Andrews:

Please be advised that we have reviewed the Technical Evaluation and Preliminary Determination for the above project and offer the following comments:

- 1) The EPC agrees with the findings in the Technical Evaluation and Preliminary Determination.
- 2) The EPC feels that the specific conditions contained in the permit do not accurately reflect the notification and recordkeeping requirements of 40 CFR 60.7, the performance test requirements of 40 CFR 60.8 or the requirements of 40 CFR 60.11. As drafted the permittee is not made aware of these requirements and thus may fail to comply. As a minimum the specific conditions should direct the permittee to the requirements.
- 3) The EPC feels that specific condition #3 is incorrect. The correct standard should be no visible emissions (5% opacity) 17-2.650, since in this case, materials are not being discharged to the shiphold.

If you have any questions, please feel free to contact me at SUNCOM 543-5530.

Sincerely,

Darrel Graziani  
Chief, Air Permitting Section

cg

cc: Harry Kerns, P.E., SW District  
Guy Schuch, LaFarge  
*H. Kerns*