

**Application Routing and Transmittal Sheet (AO/AE)**

| Air Permitting Supervisor - Required Information for Project Setup by Admin |  |                           |                  |
|---|--|---------------------------|------------------|
| Owner/(Facility Name, if needed):   | Eagle Roofing Products of Florida LLC  |                           |                  |
| Facility ID No.:  | 1190045  | Latitude:                 | Longitude:       |
| Project Name:   | Initial Operation Permit   |                           |                  |
| Project Description:  | Initial operation permit to incorporate 001-AC and 004-AC, Co-processing w/ 004-AC                         |                           |                  |
| Facility Type:  | <input type="checkbox"/> New <input type="checkbox"/> Relocatable  | Total Fee Submitted (\$): | 6000 5700        |
| Type/Subtype:   | AO00   | Total Fee Required (\$):  | 6000 5700        |
| Date Received:  | 5/7/08   | Net Fee Needed (\$):      | 0                |
| Fee Status:   | <input checked="" type="checkbox"/> Correct <input type="checkbox"/> Incorrect <input type="checkbox"/> NA | Net Fee Refund (\$):      | 0                |
| Fee Checked By:   | cz   | Fee override reason:      | multiple sources |
| Date Fee Checked:   | 5/8/08   | (if needed)               |                  |

| Admin - Project Setup Information |     |                    |              | Permit Number: |
|-----------------------------------|-----|--------------------|--------------|----------------|
| Project Number:                   | 002 | Initial ARMS Entry | Date: 5/9/08 | 1190045-002-AO |
|                                   |     |                    | Initials: SW |                |

| Air Permitting Supervisor - Application Information |                 |                    |    |                                |    |
|---|-----------------|--------------------|----|--------------------------------|----|
| Application Assigned To:                            | Graham I Knight | No. of Hardcopies: | 2  | Copies issued to DEP/Engineer: | 2  |
| Date Assigned:                                      | 5/8/08          | No. of Disk:       | na | Copies issued to County:       | na |
| Confidential Information (Y/N):                     |                 | EPSAP (Y/N):       | n  | Copies issued to other:        | na |

| Compliance/Enforcement Review (review marked by supervisor)                            |        |
|--|--------|
| Permit Supervisor - Email sent for application review/comments:                        | 5/8/08 |
| Permit Supervisor - Copy of transmittal sheet to Bret Galbraith (new facility)? (Y/N): | n      |
| Permit Supervisor - Draft Permit Review? (Y/ED)  | ED     |

| Air Permitting - Permit Transmittal (add initials & date completed) |                                     |          |  |                                     |        |
|---|-------------------------------------|----------|--|-------------------------------------|--------|
|   | Intent / Draft                      |          |  | Final                               |        |
|   | Day 30                              | Day 90   |  | Day 30                              | Day 90 |
| Permit Clock Dates  |                                     | 11/24/08 |  |                                     | 1/3/09 |
| Zipfile Name On Air - Common *                                      | 1190045.002.20.004.ac.eagleroofing  |          |  | 1190045.002.20.004.ac.eagleroof.zip |        |
| Final Permit Name On Air - Common *                                 | 1190045.002.20.004.ac.eagleroof.com |          |  | 1190045.002.20.004.ac.eagleroof.com |        |
| Engineer -> Permit Reviewer   | LEK 2/28/08/10/15/08                |          |  | LEK 12/19/08                        |        |
| Permit Reviewer -> Permit Supervisor                                |                                     |          |  |                                     |        |
| Permit Supervisor -> DAPA   | cf 10/20/08                         |          |  | cf 12/19/08                         |        |
| DAPA -> Clerk/Engineer  | MON 11-11-08                        |          |  | MON 12-22-08                        |        |
| Permit Package Mailed / Emailed                                     | 11-14-08                            |          |  | CLM 12-22-08                        |        |
| Arms/Event Entry  | 11-14-08                            |          |  | cf 12-22-08                         |        |
| Copy to Interested Party (Y/N)                                      |                                     |          |  |                                     |        |
| Posted to DEP Website   | 11-14-08                            |          |  | 12/23/08                            |        |
| ARMS Inventory Data Entry:  | 12/19/08 LEK                        |          |  | Permitting Clerk:                   |        |

\* Air\_Common\Permitting\Permits\PermitXX\

| Air Permitting Supervisor - Data Fields for Access System (add at final Issuance) |  |                 |     |
|---|--|-----------------|-----|
| Issue Date:   |  | MACT:           |     |
| Facility Description:   | Other  | NSPS:           | 000 |
| Source Description:   | Material Handling  | FUEL:           |     |
| 296:  |  | Control Equip.: |     |
| Project Description / Comments:   | Roofing tile manufacturing facility Being co-processed with 1190045-004-AC |                 |     |
| Permit Clerk - Permit List Data Entry (Access):                                   | 11/05/09   |                 |     |

| Special Routing  |  |
|--|--|
| Permitting Supervisor - Engineer to send final permit to compliance section (Y/N): |  |

|   |  |  |  |
|---|--|--|--|
| <input checked="" type="checkbox"/> Application Log | <input checked="" type="checkbox"/> Fee Verification in ARMS | <input checked="" type="checkbox"/> Deadline Check | <input checked="" type="checkbox"/> Project ID |
|---|--|--|--|

**Application Routing and Transmittal Sheet (AC/AO/AF)**

| <b>Air Permitting Supervisor – Required Information for Project Setup by Admin</b> |  |                           |            |
|--|--|---------------------------|------------|
| Owner/(Facility Name, if needed):  | Eagle Roofing Products of Florida LLC  |                           |            |
| Facility ID No.:   | 1190045  | Latitude:                 | Longitude: |
| Project Name:  | AC modification  |                           |            |
| Project Description:   | modification to EU Nos. 004 and 005  |                           |            |
| Facility Type:   | <input type="checkbox"/> New <input type="checkbox"/> Relocatable  | Total Fee Submitted (\$): | 250        |
| Type/Subtype:  | ACM1   | Total Fee Required (\$):  | 250        |
| Date Received:   | 7/8/08   | Net Fee Needed (\$):      | 0          |
| Fee Status:  | <input checked="" type="checkbox"/> Correct <input type="checkbox"/> Incorrect <input type="checkbox"/> NA | Net Fee Refund (\$):      | 0          |
| Fee Checked By:  | cz   | Fee override reason:      | none       |
| Date Fee Checked:  | 7/29/08  | (if needed)               |            |

| <b>Admin – Project Setup Information</b> |     |                    |       | Permit Number: |
|--|-----|--------------------|-------|----------------|
| Project Number:                          | 004 | Initial ARMS Entry | Date: | Initials:      |
|  |     |                    |       | 1190045-004-AC |

| <b>Air Permitting Supervisor – Application Information</b> |          |                    |    |                                |    |
|--|----------|--------------------|----|--------------------------------|----|
| Application Assigned To:                                   | Knight N | No. of Hardcopies: | 1  | Copies issued to DEP Engineer: | 1  |
| Date Assigned:   | 7/8/08   | No. of Disk:       | na | Copies issued to County:       | na |
| Confidential Information (Y/N):                            |          | EPSAP (Y/N):       | n  | Copies issued to other:        | na |

| <b>Compliance/Enforcement Review (review marked by supervisor)</b>                     |    |
|--|----|
| Permit Supervisor – Email sent for application review/comments:                        | na |
| Permit Supervisor – Copy of transmittal sheet to Bret Galbraith (new facility)? (Y/N): | n  |
| Permit Supervisor – Draft Permit Review? (Y/ED)  | ED |

| <b>Air Permitting - Permit Transmittal (add initials &amp; date completed)</b> |  |         |         |         |         |                   |  |  |  |
|--|--|---------|---------|---------|---------|-------------------|--|--|--|
| Permit Clock Dates   | Intent / Draft                         |         |         | Final   |         |                   |  |  |  |
|  | Day 30:                                | Day 90: | Day 30: | Day 90: | Day 90: |                   |  |  |  |
| Zipfile Name On Air Common *   |  |         |         |         |         |                   |  |  |  |
| Final Permit Name On Air Common *  |  |         |         |         |         |                   |  |  |  |
| Engineer → Permit Reviewer   | Being co-processed with 1190045-002-AO |         |         |         |         |                   |  |  |  |
| Permit Reviewer → Permit Supervisor  |  |         |         |         |         |                   |  |  |  |
| Permit Supervisor → DAPA   |  |         |         |         |         |                   |  |  |  |
| DAPA → Clerk/Engineer  |  |         |         |         |         |                   |  |  |  |
| Permit Package Mailed / Emailed  |  |         |         |         |         |                   |  |  |  |
| Arms Event Entry   |  |         |         |         |         |                   |  |  |  |
| Copy to Interested Party (Y/N)   |  |         |         |         |         |                   |  |  |  |
| Posted to DEP Website  |  |         |         |         |         |                   |  |  |  |
| ARMS Inventory Data Entry:   |  |         |         |         |         |                   |  |  |  |
|  |  |         |         |         |         | Permitting Clerk: |  |  |  |

\* Air\_Common\Permitting\Permits\PermitXX\

| <b>Air Permitting Supervisor - Data Fields for Access System (add at final Issuance)</b> |  |                 |  |
|--|--|-----------------|--|
| Issue Date:  |  | MACT:           |  |
| Facility Description:  |  | NSPS:           |  |
| Source Description:  |  | FUEL:           |  |
| 296:   |  | Control Equip.: |  |
| Project Description / Comments:  |  |                 |  |
| Permit Clerk – Permit List Data Entry (Access):  |  |                 |  |


| <b>Special Routing</b>  |  |
|---|--|
| Permitting Supervisor – Engineer to send final permit to compliance section (Y/N) |  |

|   |   |   |  |
|---|---|---|--|
| <input checked="" type="checkbox"/> Application Log | <input type="checkbox"/> Fee Verification in ARMS | <input type="checkbox"/> Deadline Check | <input checked="" type="checkbox"/> Project ID |
|---|---|---|--|

**MEMORANDUM**

**TO:** Cindy Zhang-Torres  
Air Program Permitting Supervisor

**DATE:** 12/19/08

**FROM:** Nancy E. Knight  
Permit Engineer Specialist 

**SUBJECT:** Company: Eagle Roofing Products Florida, LLC  
Permit Nos.: 1190045-002-AO  
1190045-004-AC Final Issuance  
County: Sumter  
Project: Delete EU 006 and Initial Operation Permit  
**Default Date (Day 90): 1/3/2009**

The Intent to Issue Public Notice for the above permit was published on 12/4/08. I reviewed the proof of publication (received on 12/10/08) and verified that the correct notice was published.

I recommend issuance of this final permit, which is identical to the draft permit approved by this office as part of the Notice of Intent package.

## **Knight, Nancy**

---

**From:** Karen Eldridge [karene@BurlingameIndustries.com]  
**Sent:** Friday, December 12, 2008 2:26 PM  
**To:** Knight, Nancy  
**Subject:** FW: Circulation Numbers

-----Original Message-----

**From:** Baldeschwieler, Robin  
[mailto:Robin.Baldeschwieler@thevillagesmedia.com]  
**Sent:** Friday, December 12, 2008 7:41 AM  
**To:** Karen Eldridge  
**Subject:** Circulation Numbers

Hi Karen,

We provide 22,808 copies to Sumter County  
13,582 copies to Lake County  
5,537 copies to Marion County

These numbers are from the March 31, 2008 ABC Audit

Please let me know if you need anything else.

Thanks and have a great day!

Robin Baldeschwieler  
The Villages Daily Sun  
Classified Manager  
352-753-11119 ext. 9696  
FAX: 352-750-2381  
Email: [Robin.Baldeschwieler@thevillagesmedia.com](mailto:Robin.Baldeschwieler@thevillagesmedia.com)

The Villages  
**DAILY SUN** Dept. of Environmental Protection

Published Daily  
Lady Lake, Florida  
State of Florida  
County Of Lake Southwest District

DEC 10 2008

Attach Notice Here

ters to the cement surge bins in Emission Unit 004. The operation permit authorizes the continued operation of this facility. MAILING ADDRESS: Eagle Roofing Products Florida LLC, 3546 N. Riverside Avenue, Rialto, CA 92377 to the attention of Mr. Seamus Burlingame, CEO.

The Department will issue the final permits 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 fourteen days from the date of publication of this Public Notice of Intent to Issue Two Air Permits. Written comments should be provided to the Department of Environmental Protection, 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926. 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 permits and require, if applicable, another Public Notice.

The Department will issue the final permits 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.

Mediation is not available in this proceeding.

**PUBLIC NOTICE  
OF INTENT TO ISSUE  
TWO AIR PERMITS**

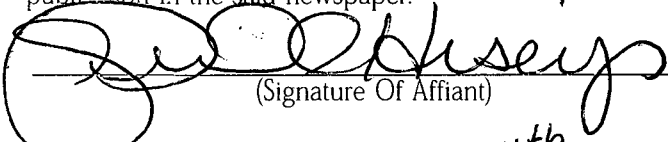
STATE OF FLORIDA  
DEPARTMENT OF  
ENVIRONMENTAL  
PROTECTION  
DEP File Nos. 1190045-002-AO  
and 1190045-004-AC  
Eagle Roofing Products Florida,  
LLC  
Sumter County

The Department of Environmental Protection (Department) gives notice of its intent to issue two air permits to Eagle Roofing Products Florida LLC for its roof tile manufacturing facility located at 1575 East County Road 470, Sumterville, Sumter County. These permits authorize Eagle Roofing Products Florida LLC to add white cement and W-10 aggregate to the types of material used to manufacture the roof tiles. It deletes Emission Unit No. 6, Crushed Tile Storage Bins, as the emissions from this activity are controlled by the dust collection system for Emission Unit No. 5, Reject Tile Recycling Crusher System. It deletes the requirement to conduct visible emissions testing on Emission Unit No. 4, Tile Production Building while conveying only sand. It adds two bin vent fil-

Before the undersigned authority personally appeared April Hisey, who on oath says that she is Legal Ad Coordinator of the DAILY SUN, a daily newspaper published at Lady Lake in Lake County, Florida with circulation in Lake, Sumter and Marion Counties; that the attached copy of advertisement, being a Legal Ad # 131632 in the matter of Public Notice

in the \_\_\_\_\_ court, was published in said newspaper in the issues of December 4, 2008

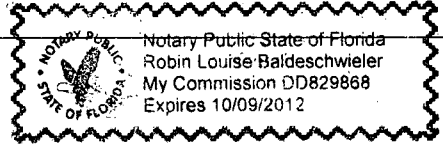
Affiant further says that the said Daily Sun is a newspaper published at Lady Lake in said Lake County, Florida, and that the said newspaper has heretofore been continuously published in said Lake County, Florida, each week and has been entered as second class mail matter at the post office in Lady Lake, in said Lake County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisements; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

  
(Signature Of Affiant)

Sworn to and subscribed before me this 4th day of December, 2008.

Robin Louise Baldeschwieler  
(Name of Notary typed, printed or stamped)

Personally Known  or  
Production Identification \_\_\_\_\_  
Type of Identification Produced \_\_\_\_\_



*See attached page.*

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, 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, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-30000. 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), F.S. 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), F.S., 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, F.A.C.

All petitions filed under these rules shall contain:

- (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 when and how the petitioner received notice of the agency decision;
- (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, including an explanation of how the alleged facts relate to the specific rules or statutes; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action the 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, F.A.C.

Because the administrative hearing process is designed to formulate final agency ac-

tion, 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.

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 the Florida Department of Environmental Protection, Southwest District, 13051 N. Telecom Parkway, Temple Terrace, Florida.

The complete project file includes the application, technical evaluation, draft permits, and the information submitted by the authorized representative, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara Grace Nasca, Southwest District Air Program Administrator, at 13051 N. Telecom Parkway, Temple Terrace, Florida or call 813-632-7600, for additional information.

Any person may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, a copy of the draft permits, and all other materials available to the Department that are relevant to the permit decision. Additionally, the Department will accept written comments concerning the proposed permit issuance action for a period of 14 (four-

teen) days from the date of publication of "Public Notice of Intent to Issue Two Air Permits." Requests and written comments filed should be provided to the Florida Department of Environmental Protection at 13051 N. Telecom Parkway, Temple Terrace, FL 33637-0926, to the attention of Mara Grace Nasca (phone no. 813-632-7600) referencing the DEP file number(s) listed above. 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 permits and require, if applicable, another Public Notice.

#131632 December 4, 2008



# Florida Department of Environmental Protection

Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## P.E. CERTIFICATE STATEMENT

### PERMITTEE

Eagle Roofing Products of Florida LLC

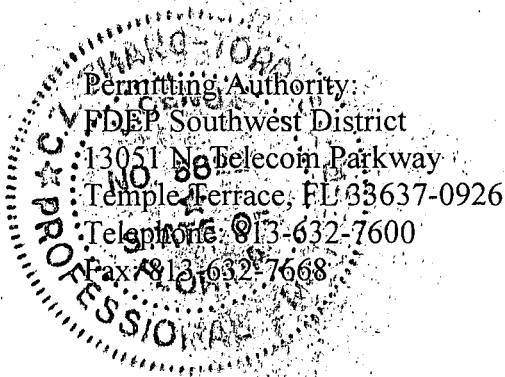
Draft Air Permit No. 1190045-004-AC

Project Type: ACM1

Project Description: authorizes the facility to add white cement and W-10 aggregate to the types of material used to manufacture the roof tiles; deletes Emission Unit No. 6, Crushed Tile Storage Bins, as the emissions from this activity are controlled by the dust collection system for Emission Unit No. 5, Reject Tile Recycling Crusher System; deletes the requirement to conduct visible emissions testing on Emission Unit No. 4, Tile Production Building while conveying only sand; and adds two bin vent filters to the cement surge bins in Emission Unit 004.

**I HEREBY CERTIFY** that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological and meteorological features).

Cindy Zhang-Torres      10/20/08  
C.Z. Zhang-Torres, P.E.      Date  
License Number: 58222



## MEMORANDUM

**TO:** Cindy Zhang-Torres  
Air Program Permitting Supervisor

**DATE:** 10/14/08

**FROM:** Nancy E. Knight  
Air Permit Engineer

**SUBJECT:** Company: Eagle Roofing Products Florida LLC  
Permit No.: 1190045-002-AO/1190045-004-AC (*Combined Permit*)  
Intent to Issue  
County: Sumter  
Project: Delete EU 006 and Initial Operation Permit  
**Default Date (Day 90):** 11/24/2008

An application for the initial air operation permit was received from Eagle Roofing Products Florida LLC on 05/07/08. Nedin Bahtic and I conducted a site visit to the facility on May 19, 2008. We discovered that the baghouse for EU 006, 100 Ton Bulk Crushed Tile Storage Bin was not there, but the emissions from the crushed tile storage bin were controlled by the dust collector for EU 005, Reject Tile Recycling Crusher System. They were using white cement and W-10 aggregate which were not listed in the construction permit. They were also missing records. I explained they would have to submit a construction permit application to modify their existing construction permit.

I sent a request for additional information on 5/22/08. The Department received a response to the RAI and the construction permit application on 07/08/08. Subsequent requests for information were sent by email (see file). It was noted during the initial review of this permit by Cindy Zhang-Torres that different silo loading rates were listed in different sections of the permit. Mr. Victor Torcat of Eagle Roofing Products and Christine Brenk of Kleinfelder were questioned about this and it was decided to wait until annual VE testing was complete to validate the proper rate. There was also a question as to whether the required minimum material transfer rate during testing of 141.7 TPH (90% of the maximum rate listed in the application, 157.5) for EU 004 Tile Production Building, could be met with only 3 lines running.

Initial testing was completed in 2007. The subsequent annual VE testing was conducted on September 3, 4, and 8, 2008. The silo loading rate was confirmed to be a minimum of 25 TPH. The material transfer rate through the Tile Production Building was 92.32 TPH. Seventy-five percent (3 lines vs. 4 lines) of the maximum rate is 118.13, 90% of that is 106.31. Therefore 92.32 TPH is too low to meet the current permit condition even with only 3 lines running. It was decided to change the VE testing permit condition for the Tile Production Building to read that all three lines must be operating and producing tile instead of specifying a production rate.

Even though only three lines are currently running it was determined to leave the maximum throughput of 384 TPH and 1.11 million tons per 12 consecutive month period as the permitted capacity.

Particulate matter emissions are not affected by the changes. The emissions that were previously separated between EU 005 and EU 006 are now added together in EU 006. The emission factor for sand and W-10 aggregate is the same. The potential emissions were calculated in the original technical evaluation using the maximum amount of material that can be transferred (384 TPH). Adding W-10 aggregate to the list of materials will not change the emissions since only one type of material can be transferred at a time.



This memo serves as the technical evaluation.

This facility is under enforcement for testing one of the silos at too low a rate, failure to maintain required records and failure to submit an application for an operation permit in a timely manner. As of this date Eagle Roofing has not paid the penalty for these violations.

I recommend that this Intent to Issue and draft permit be sent out as attached and submit it for your review and approval.

## Knight, Nancy

---

**From:** Christine Brenk [CBrenk@kleinfelder.com]  
**Sent:** Monday, October 13, 2008 3:55 PM  
**To:** Knight, Nancy  
**Cc:** victort@BurlingameIndustries.com  
**Subject:** Re: Tile Production VE Testing Rate

Nancy,

You had asked me to provide information regarding the potential change in emissions from EU-1 as a result of adding aggregate. I have reviewed the calculations and confirm the following:

Per AP-42, Section 13.2.4-4, the particulate emission factor for aggregate drop points is based on the moisture content of the material (minimum of 6%) the particulate size (less than 10 micron), and wind speed (ave. 4.19 miles/hr). Each of these parameters are the same for sand and W-10. The shale uses a higher moisture content (11%) which is why the emission factor is lower.

As you know, there is no change in total throughput rates of these materials. In hindsight, we should have used the heading "sand and W-10" in the spreadsheet to clarify this point. There is no change in total emissions.

As we discussed (and in response to your question below), it would be acceptable to use the general language that the tile lines must be in production during VE testing.

Will we receive a copy of the draft Air Operating Permit before it is finalized?

Thanks,  
Christine

Christine K. Brenk, CHMM  
6200 Harris Technology Boulevard  
Charlotte, North Carolina 28269  
o | 703.598.1049  
f | 704.598.1050

( <http://www.kleinfelder.com/> )

>>> "Knight, Nancy" <[Nancy.Knight@dep.state.fl.us](mailto:Nancy.Knight@dep.state.fl.us)> 10/13/2008 1:49 PM

>>> >>>

Christine

Cindy Zhang-Torres the permitting supervisor said we could put the condition that all tile lines had to be operating and actually making tile instead of an actual rate. Would that be acceptable?

Nancy E. Knight

Engineer Specialist

Southwest District Air Program

Department of Environmental Protection

(813) 632-7600 ext., 120

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of

service you received. Copy the url below to a web browser to complete the DEP

survey: <http://survey.dep.state.fl.us/?refemail=Nancy.Knight@dep.state.fl.us> Thank you in advance for completing the survey.

Warning: Information provided via electronic media is not guaranteed against defects including translation and transmission errors.

If the reader is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this information in error, please notify the sender immediately.

## **Knight, Nancy**

---

**From:** Christine Brenk [CBrenk@kleinfelder.com]  
**Sent:** Monday, October 13, 2008 2:33 PM  
**To:** Knight, Nancy  
**Subject:** Re: Tile Production VE Testing Rate

Yes, very acceptable.

Christine K. Brenk, CHMM  
6200 Harris Technology Boulevard  
Charlotte, North Carolina 28269  
o | 703.598.1049  
f | 704.598.1050

( <http://www.kleinfelder.com/> )

>>> "Knight, Nancy" <[Nancy.Knight@dep.state.fl.us](mailto:Nancy.Knight@dep.state.fl.us)> 10/13/2008 1:49 PM  
>>> >>>  
Christine

Cindy Zhang-Torres the permitting supervisor said we could put the condition that all tile lines had to be operating and actually making tile instead of an actual rate. Would that be acceptable?

Nancy E. Knight

Engineer Specialist

Southwest District Air Program

Department of Environmental Protection

(813) 632-7600 ext., 120

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of

service you received. Copy the url below to a web browser to complete the DEP

survey: <http://survey.dep.state.fl.us/?refemail=Nancy.Knight@dep.state.fl.us> Thank you in advance for completing the survey.

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## **Knight, Nancy**

---

**From:** Knight, Nancy  
**Sent:** Wednesday, September 10, 2008 1:46 PM  
**To:** 'Christine Brenk'; 'Victor Torcat'  
**Subject:** Loading rate for cement silos

The description for EUs 002 and 003 state that the cement silos have a maximum loading rate of 22.5 TPH. Specific condition C.4. states that the minimum loading rate shall be 25 TPH during testing. The application states that the hourly throughput is 22.5 TPH and the annual throughput is 197,100 TPY. This leads me to think that you use cement at a rate of 22.5 TPH while making tile, but you can load the silo at 25 TPH or greater. The 25 TPH comes from the concrete batch plant rule 62-296.414(3), F.A.C. Please tell me the proper silo loading rate.

My supervisor said it would be OK to use material instead of sand in line 3 of Specific Condition B.5.

Can you achieve the transfer rate of 141.7 TPH during the VE test of EU 004 with only 3 lines running?

Thanks for your help.

Nancy E. Knight  
Engineer Specialist  
Southwest District Air Program  
Department of Environmental Protection  
(813) 632-7600 ext., 120

## **Knight, Nancy**

---

**From:** Holtom, Jonathan  
**Sent:** Wednesday, August 27, 2008 3:02 PM  
**To:** Knight, Nancy  
**Cc:** Miesel, Tiffany  
**Subject:** FW: 40 CFR 60 Subpart OOO and Subpart A

Nancy,

The sections in question are:

§60.2 Definitions.

§60.3 Units and abbreviations.

§60.4 Address.

I'm guessing that these were deleted from the standardized conditions on purpose as not having specific bearing on our permits (although they do contain good information). 60.2 is not need in the permit, 60.3 is mostly covered by our Appendix A, Abbreviations, etc., and 60.4 is covered in our facility-wide conditions. The version of Subpart A that is posted on the permit writer's tools is current as of 6/7/06, but the version posted on EPA's web site says that the eCFR data is current as of 8/25/08, but I don't know if means anything was specifically changed in this subpart. If you find something that you think is not up to date with the version that we have posted, please let Tiffany know so she can start working on updating this subpart. Otherwise, what is posted should be fine for your permit without 60.2-4.

Jon Holtom  
(850) 921-9531

---

**From:** Miesel, Tiffany  
**Sent:** Wednesday, August 27, 2008 10:22 AM  
**To:** Holtom, Jonathan  
**Subject:** FW: 40 CFR 60 Subpart OOO and Subpart A

I'm not sure how to answer this...but cc me on the response so I can learn!

Thanks!

*Tiffany Miesel*

---

**From:** Knight, Nancy  
**Sent:** Wednesday, August 27, 2008 10:11 AM  
**To:** Miesel, Tiffany  
**Subject:** 40 CFR 60 Subpart OOO and Subpart A

I left you a voice mail about this but wasn't sure if it actually went to you.

I need to add 40 CFR 60 Subpart OOO to one of my permits. The applicability table in the copy I got off of Permit Writer's Tools says paragraphs 60.2, 60.3, 60.4 are applicable, but the Subpart A I also got off of Permit Writer's Tools didn't have these paragraphs. Am I looking in the wrong place?

Thanks for your help

Nancy E. Knight  
Engineer Specialist  
Southwest District Air Program  
Department of Environmental Protection  
(813) 632-7600 ext., 120



## **Knight, Nancy**

---

**From:** Christine Brenk [CBrenk@kleinfelder.com]  
**Sent:** Tuesday, August 26, 2008 8:43 AM  
**To:** Knight, Nancy  
**Subject:** Eagle VE Testing

Nancy,

The sand, W10 and future shale is conveyed to the 200 ton bins separately (one at a time). Therefore, it would be ok to include a provision for testing one of the materials or each of the material separately. As we discussed, the materials do not exhibit any difference in emissions due to their high moisture content.

Will the final permit require testing on an annual basis? It seems to me that if the facility demonstrates compliance for two or three years in a row, then they shouldn't have to test annually. In the case of Eagle, the first round of testing was 0% opacity and this is the norm.

I am in the office today if you want to talk about or further clarify this information.

Thanks,  
Christine

Christine K. Brenk, CHMM  
6200 Harris Technology Boulevard  
Charlotte, North Carolina 28269  
o | 704.598.1049  
d | 704.598.9030 ext. 451  
f | 704.598.1050  
( <http://www.kleinfelder.com/> )

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## Knight, Nancy

---

**From:** Christine Brenk [CBrenk@kleinfelder.com]  
**Sent:** Monday, August 25, 2008 1:04 PM  
**To:** Knight, Nancy  
**Subject:** RE: Eagle Questions

Nancy,

I reviewed the processes and discussed your question with Victor at Eagle. The sand and W10 mixing occurs in EU004 (the surge bin area of the building). There is no mixing that occurs in EU 001. Give me a call if you need more information.

Christine

Christine K. Brenk, CHMM  
6200 Harris Technology Boulevard  
Charlotte, North Carolina 28269  
o | 704.598.1049  
d | 704.598.9030 ext. 451  
f | 704.598.1050  
( <http://www.kleinfelder.com/> )

>>> "Knight, Nancy" <[Nancy.Knight@dep.state.fl.us](mailto:Nancy.Knight@dep.state.fl.us)> 8/25/2008 8:41 AM >>>  
Thanks. I will be in training this morning, but will give you a call after lunch.

Nancy E. Knight  
SWD Air Program

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of

service you received. Copy the url below to a web browser to complete the DEP

survey: <http://survey.dep.state.fl.us/?refemail=Nancy.Knight@dep.state.fl.us> Thank you in advance for completing the survey.

**From:** Christine Brenk [mailto:CBrenk@kleinfelder.com]  
**Sent:** Monday, August 25, 2008 8:33 AM  
**To:** Knight, Nancy  
**Subject:** Eagle Questions

Nancy,

I returned from vacation this morning and I received your message. I am

reviewing the information related to your questions and will get back with you shortly!

Christine

Christine K. Brenk, CHMM  
6200 Harris Technology Boulevard  
Charlotte, North Carolina 28269  
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**Knight, Nancy**

---

**From:** Christine Brenk [CBrenk@kleinfelder.com]  
**Sent:** Monday, August 18, 2008 11:28 AM  
**To:** Knight, Nancy  
**Cc:** victort@BurlingameIndustries.com  
**Subject:** Re: Table for Emission Unit 1

Nancy,

I made minor revisions to your table. Following the emission sources in the calculation sheet for PM/PM10, BC-6 leads to screening, and material from the screening processes is conveyed to BC-7. Also, there is only one drop point from the 200T bin to BC-8.

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>>> "Knight, Nancy" <[Nancy.Knight@dep.state.fl.us](mailto:Nancy.Knight@dep.state.fl.us)> 8/15/2008 10  
Emission Point No. Brief Description Opacity Limit  
1 Hopper 1, 2, and 3 to BC-1 10 %  
2 Hopper 4, 5, and 6 to BC-2 10 %  
3 Hopper 7, 8, and 9 to BC-3 10 %  
4 Hopper 10, 11, and 12 to BC-4 10 %  
5 BC-1 to BC-5 conveyor drop point. 10 %  
6 BC-2 to BC-5 conveyor drop point. 10 %  
7 BC-3 to BC-5 conveyor drop point. 10 %  
8 BC-4 to BC-5 conveyor drop point. 10 %  
9 BC-5 to BC-6 conveyor drop point to screening structure 10 %  
10 screen tower structure to BC-7 10 %  
11 BC-7 to 200-ton storage bin. 10 %  
12 200 Ton Storage Bin to BC-8 10 %  
13 BC-8 to BC-9; BC-10 10 %  
14 BC-27 to BC-5 conveyor drop point 10 %  
:20 AM >>>  
Christine

This table is from the permit and has to do with the question from our conversation yesterday. Please let me know if these emission points are still correct.

Emission Point No.

Brief Description

Opacity Limit

1

Hopper 1, 2, and 3 to BC-1

10 %

2

Hopper 4, 5, and 6 to BC-2

10 %

3

Hopper 7, 8, and 9 to BC-3

10 %

4

Hopper 10, 11, and 12 to BC-4

10 %

5

BC-1 to BC-5 conveyor drop point.

10 %

6

BC-2 to BC-5 conveyor drop point.

10 %

7

BC-3 to BC-5 conveyor drop point.

10 %

8

BC-4 to BC-5 conveyor drop point.

10 %

9

BC-5 to BC-6 conveyor drop point at the transfer tower structure.

10 %

10

BC-6 to BC-7 screen tower structure

10 %

11

BC-7 to 200-ton storage bin.

10 %

12

200 Ton Storage Bin to BC-9

10 %

13

200 Ton Storage Bin to BC-10

10 %

14

BC-27 to BC-5 conveyor drop point

10 %

Thanks

Nancy E. Knight

SWD Air Program

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survey: <http://survey.dep.state.fl.us/?refemail=Nancy.Knight@dep.state.fl.us> Thank you in advance for completing the survey.

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## **Knight, Nancy**

---

**From:** Christine Brenk [CBrenk@kleinfelder.com]  
**Sent:** Thursday, August 14, 2008 4:52 PM  
**To:** Knight, Nancy  
**Cc:** victort@BurlingameIndustries.com  
**Subject:** Air Permit for Eagle Roofing

Nancy,

As discussed during our telephone conversation this afternoon, we are confirming the following information:

1. The throughput rates in the permit can remain the same as the construction permit. As you are aware, these rates are higher than the current plant capacity, but will reflect the rates needed when the fourth tile manufacturing line is constructed.
2. The description of the emission points for EU 001 (page 2 of the construction permit) should read 5 conveyor belt drop points instead of 10 at the third bullet. The five belt conveyors drop points are outlined in the particulate emission calculation sheets.
3. The method for wetting material at the "fine material hopper" (EU 005) is a water spray that is plumbed to this location. The operator will turn it on when material is loaded to the hopper. For your information, this hopper has not been used to date.

Please call if you have any additional questions.

Thanks,

Christine

Christine K. Brenk, CHMM  
6200 Harris Technology Boulevard  
Charlotte, North Carolina 28269  
o| 704.598.1049  
d| 704.598.9030 ext. 451  
f | 704.598.1050  
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Attachment to email from  
Christine Brenk dated 8/4/08

I have a few questions about the construction permit application and answer to the Department's request for additional information dated June 30, 2008. Everything in blue comes directly from the current construction permit.

1. The following is from the facility description in the permit. Now that we are adding white cement and W-10 aggregate, please modify the statement below to include them.

"This facility manufactures concrete roof tile. It has a design capacity of approximately ~~315~~ 236.5 million tiles per year and manufactures standard concrete roof tiles comprised of W-10 aggregate, sand plaster and ~~gray~~ cement and lightweight concrete roof tiles comprised of shale and ~~gray~~ cement. Both standard and lightweight tiles can be produced in a variety of shapes depending upon the mold surface upon which the concrete tiles are formed."

2. The following is also from the facility description. What is the moisture content of the W-10 aggregate when it is delivered?

"The sand is delivered with a moisture content of approximately 6% , W-10 aggregate is delivered with a moisture content of approximately 5% and while the shale is delivered with a moisture content of approximately 11%."

3. The following is from the table for EU001. The table on Figure 2 in the new application says BC-27 to BC-5. Shall I change the table to read BC-27 to BC-5? Yes

|    |                                   |      |
|----|-----------------------------------|------|
| 14 | BC-28 to BC-5 conveyor drop point | 10 % |
|----|-----------------------------------|------|

4. ~~4.~~ Is the following still true or do you always have the dust collection system on at the screening process pickup point? It is listed as collection point 13 in Table 2 of the new application.

We recommend deleting this paragraph. Dust collection occurs at the belt conveyor drop point for the screen process and not the screening process itself. Note: the screening process does not generate visible emissions since it is an enclosed process. This was confirmed by visible emission testing at this location.

"Particulate matter emissions from the screening process are considered fugitive. However, particulate-matter emissions from the screening process may be controlled by the dust collection system utilized by the reject tile crusher/screens (emission unit 005). The design airflow of the dust collection system at this screening process pickup point is approximately 800 dscfm to achieve 90% or greater collection."

5. Page 14 of the application lists the maximum annual rate of 1.18 MM TPY. The rate is 1.11 MM TPY in the current permit. I see that it is listed that way in the original application as well. Did we list that incorrectly in the construction permit? The annual rate on page 14 of the application form should be changed to 886,950 tons per year, consistent with the PM and PM10 calculation sheets provided in Attachment 2.

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6. Please review the new description for Emission Unit 004 (below). The new language is in red. Please change it if necessary so it accurately describes the process.

(1) Sand/W-10 Aggregate/Shale/Cement Mixing Area - This portion of the emission unit consists of activities associated with sand, shale or W-10 aggregate and cement mixing. Sand, shale or W-10 aggregate and cement from emission units 001, 002 and 003 are premixed together, in an enclosed area designated as the "Surge Bin Area". Upon demand generated by operation of any of the three ~~four~~ roofing tile manufacturing lines, sand, W-10 aggregate or shale is automatically obtained from the base of one of the two 100-ton compartments of the 200-ton storage bin and transfers, via covered conveyor belts, to one of two 55-ton surge hoppers (containing either shale, W-10 aggregate or sand). Each of the cement surge hoppers ~~is~~ are equipped with a bin vent filter to control particulate matter and provide additional vacuum for added ability to remove residual gray or white cement from the surge hoppers when these materials are exchanged. Also upon demand, gray or white cement is automatically obtained from the cement silos and transferred via enclosed screw conveyor to the two 60-ton cement hoppers.

Sand, W-10 aggregate or shale is released from the hopper(s) to a separate "metering conveyor belt" for each individual roofing tile line. Cement is released from the hopper(s) to an enclosed screw conveyor onto a separate, enclosed metering conveyor belt for each individual roofing tile line. Sand, W-10 aggregate or shale and cement are released from the metering conveyor belts onto raw material conveyor belts for each roofing tile line. Sand, W-10 aggregate or shale and cement on each of the three (3) ~~four~~ (4) raw material conveyor belts are premixed in their own mixer. The mixed raw material is then transported via the raw material conveyor belts (one for each roofing tile line) through a narrow portal in the wall separating the Surge Bin Area from the main production building.

The maximum throughput for this equipment is ~~157.5~~ 118.13 tons/hour and ~~1.38~~ 41MM tons/year annually. Baghouse dust collectors (one for each of the three process lines) ~~?? (one for each of the four process lines)~~ are used to control particulate matter emissions resulting from ~~filling the cement hoppers~~ metering the cement, mixing activities and production line raw material feeds. Each baghouse is designed for 3,500 dscfm airflow and has a control efficiency of 99.9%. The four dust collectors discharge inside the building enclosure.

~~onto the raw material belts for the respective production line.~~

*Note: In addition to the sand, shale and cement hoppers, an additional 60-ton surge hopper will be present for potential future use of other raw materials (possibly fly ash and white cement). This hopper will be installed in the Surge Bin Area, but will not be functionally connected to the roofing tile manufacturing lines or any raw material receiving or storage equipment.*

Do you still have four baghouses? Yes, but one is idle pending the construction of the fourth tile manufacturing line.

The capacities of the surge bins in Figure 4 of the application are different than what is in the permit( 53 and 40 vs. 55 and 60). Is the permit right? The capacities of the cement surge bins are 40 tons, and the capacity of the sand/shale surge bins are 53 tons (Figure 4 is correct).

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Keep with next, Allow hanging punctuation,  
Adjust space between Latin and Asian text,  
Adjust space between Asian text and numbers

7. Is the sealer listed in the VOC records the sealer referenced in this sentence? - The tiles are then cured and an acrylic sealer is applied to protect the surface pigment of tiles from the elements, to prevent effluorescence and prevent pigment from fading. ~~pigment from fading.~~

8. The following is from the EU 005 description.

This emission unit receives reject tile for recycling. Reject tiles are manually placed into a primary hopper with spikes rotating and breaking tile into smaller pieces. Particulate matter emissions from this activity are controlled by water sprays located on top of the walls of the primary dump hopper. From the hopper, the wet material is transported via covered conveyor belt, to a jaw crusher.

Figure 2, Crushing/recycling layout and dust control system indicates that the primary hopper's dust is controlled by water. I would like to add that to the description above (see in red) but am not exactly sure how that happens. Please fix the sentence in red.

I also added the portion in red below:

"Undersized ("fine") material is transferred from the enclosed 2-deck shaker screen by covered conveyor belt to the 100 ton bulk crushed tile storage bin/hopper where it is eventually conveyed back to the sand, 10-W aggregate and shale handling system (Emission Unit 001) as raw aggregate.

Is this correct? Yes

9. Is the crushed tile storage bin indicated in Figure 1 – Process flow diagram recycling/crushing system, the same as the object called "fine material" at the top of the page of Figure 2. If not, can you indicate where, on figure 2, that is located? I want to be sure to mention the areas that are controlled by water instead of pick up points. Yes, the crushed tile storage bin is the "fine material" bin located at the top of Figure 2.

10. The pickup points listed in the permit (see below) are different than the ones listed in the table that is part of Figure 2 in the new application. Should I change the ones in the permit to match the ones in the table in Figure 2? What does BC stand for? Yes, the Figure 2 table is correct and should be included in the permit. BC stands for "belt conveyor".

"The maximum throughput for this emission unit is 30 tons/hour and ~~78,840~~59,130 tons/year annually. A dust collection system, with an overall design airflow of 13,600 dscfm and a control efficiency of 99.9%, is used to control particulate matter emissions from this system. The system has a total of 13 ~~4~~ dust collector pickup points within the recycle tile crusher system. The points are as follows: (1) ~~Dump hopper;~~ (2) BC-21 feed; (3) BC-22 feed; (4) BC-27 feed; (5) Jaw Crusher inlet; (6) ~~Jaw Crusher discharge-/BC-23 feed;~~ (7) ~~BC-25 to BC-23 feed~~ VSI feed; (4) VSI; (8) ~~"Fine Materials" BC-28 feed;~~ (9) BC-24 feed; (10) ~~BC-24 feed~~ VSI discharge to BC-24; (11) ~~VSI inlet;~~ Shaker screen inlet; (12) ~~Screener inlet~~ 2-deck shaker screen; (13) ~~BC-26-25 feed;~~ and (14) ~~BC-26 feed;~~ (10) BC-23 feed; (11) Crushed material hopper inlet; (12) BC-5 feed; (13) BC-6 feed. 5 feed. Additionally, the dust collector system has a pickup point located at the screen tower in emission unit 001."

11. Which material is "dustier", sand or W-10? There is not a difference in the amount of dust generated from handling W-10 aggregate vs. sand since the moisture content of both materials are delivered in the range of 5%. W-10 is a finer material. Therefore, in a dry state it would be considered "dustier".

12. Will white cement always be in the west silo and grey cement always in the east silo? We prefer to designate the silos as "west and east" and not refer to cement color. In the event of a breakdown or other emergency, it may be necessary to interchange the type of cement being stored in the silo.

13. You submitted a VOC analysis in the response. Which product is this analysis for? The analysis was provided for the mold release agent (E-48) used at Eagle Florida. This is the only mold release product used at the facility.

14. Note: Since we are adding W-10 as a material to the permit. It must be added to your recordkeeping. The amount of W-10 delivered is being maintained on a daily and monthly basis. We will make it clear in our records.

15. Note: Specific condition D.7.C. states that the VOC content for each material be listed in the monthly records. It can be calculated from the current records, but should also be written once somewhere on the monthly records. The VOC content of the mold release agent and the sealer is provided at the bottom of each monthly record.

If you have any questions please call me.

Thanks.

Nancy E. Knight  
Engineer Specialist  
Southwest District Air Program  
Department of Environmental Protection  
(813) 632-7600 ext., 120

Additional questions/comments after our telephone conversation on July 28, p.m.

I still need the 12 consecutive month tolling totals for EU 001 for sand and W-10 (with a remark somewhere that shale has not been used yet)

The daily and monthly records have rejected sand tonnage and rejected cement tonnage and rejected pieces, however there is no quantity of recycled material transferred (in tons) column. Since this is the number required by the permit it would be nice to have a column in the records that states this directly.

There is no total hours of operation in the daily records.

I would like to see a copy of the daily and monthly record for July when they are completed so I can see how you incorporated the above requests.

## Knight, Nancy

---

**From:** Knight, Nancy  
**Sent:** Monday, July 28, 2008 9:57 AM  
**To:** 'victort@burlingameindustries.com'  
**Subject:** Questions for the Eagle Roofing Operation/Construction Permit

Victor

I have a few questions about the construction permit application and answer to the Department's request for additional information dated June 30, 2008. Everything in blue comes directly from the current construction permit.

1. The following is from the facility description in the permit. Now that we are adding white cement and W-10 aggregate, please modify the statement below to include them.

"This facility manufactures concrete roof tile. It has a design capacity of approximately 315 million tiles per year and manufactures standard concrete roof tiles comprised of plaster and gray cement and lightweight concrete roof tiles comprised of shale and gray cement. Both standard and lightweight tiles can be produced in a variety of shapes depending upon the mold surface upon which the concrete tiles are formed."

2. The following is also from the facility description. What is the moisture content of the W-10 aggregate when it is delivered?

"The sand is delivered with a moisture content of approximately 6% while the shale is delivered with a moisture content of approximately 11%."

3. The following is from the table for EU001. The table on Figure 2 in the new application says BC-27 to BC-5. Shall I change the table to read BC-27 to BC-5?

|    |                                   |      |
|----|-----------------------------------|------|
| 14 | BC-28 to BC-5 conveyor drop point | 10 % |
|----|-----------------------------------|------|

4. Is the following still true or do you always have the dust collection system on at the screening process pickup point? It is listed as collection point 13 in Table 2 of the new application.

"Particulate matter emissions from the screening process are considered fugitive. However, particulate matter emissions from the screening process may be controlled by the dust collection system utilized by the reject tile crusher/screens (emission unit 005). The design airflow of the dust collection system at this screening process pickup point is approximately 800 dscfm to achieve 90% or greater collection."

5. Page 14 of the application lists the maximum annual rate of 1.18 MM TPY. The rate is 1.11 MM TPY in the current permit. I see that it is listed that way in the original application as well. Did we list that incorrectly in the construction permit?

6. Please review the new description for Emission Unit 004 (below). The new language is in red. Please change it if necessary so it accurately describes the process.

(1) Sand, W-10 Aggregate, Shale/Cement Mixing Area - This portion of the emission unit consists of activities associated with sand, shale or W-10 aggregate and cement mixing. Sand, shale or W-10 aggregate and cement from emission units 001, 002 and 003 are premixed together, in an enclosed area designated as the "Surge Bin Area". Upon demand generated by operation of any of the three ~~four~~ roofing tile manufacturing lines, sand, W-10 aggregate or shale is automatically obtained from the base of one of the two 100-ton compartments of the 200-ton storage bin and transfers,

via covered conveyor belts, to one of two 55-ton surge hoppers (containing either shale, W-10 aggregate or sand). Each surge hopper is equipped with a bin vent filter to control particulate matter and provide additional vacuum for added ability to remove residual gray or white cement from the surge hoppers when these materials are exchanged. Also upon demand, gray or white cement is automatically obtained from the cement silos and transferred via enclosed screw conveyor to the two 60-ton cement hoppers.

Sand, W-10 aggregate or shale is released from the hopper(s) to a separate “metering conveyor belt” for each individual roofing tile line. Cement is released from the hopper(s) to an enclosed screw conveyor onto a separate, enclosed metering conveyor belt for each individual roofing tile line. Sand, W-10 aggregate or shale and cement are released from the metering conveyor belts onto raw material conveyor belts for each roofing tile line. Sand, W-10 aggregate or shale and cement on each of the three (3) ~~four (4)~~ raw material conveyor belts are premixed in their own mixer. The mixed raw material is then transported via the raw material conveyor belts (one for each roofing tile line) through a narrow portal in the wall separating the Surge Bin Area from the main production building.

The maximum throughput for this equipment is 157.5 tons/hour and 1.38 MM tons/year annually. Baghouse dust collectors

?? ~~(one for each of the four process lines)~~ are used to control particulate matter emissions resulting from filling the cement hoppers, mixing activities and production line raw material feeds. Each baghouse is designed for 3,500 dscfm airflow and has a control efficiency of 99.9%. The four dust collectors discharge inside the building enclosure.

*Note: In addition to the sand, shale and cement hoppers, an additional 60-ton surge hopper will be present for potential future use of other raw materials (possibly fly ash and white cement). This hopper will be installed in the Surge Bin Area, but will not be functionally connected to the roofing tile manufacturing lines or any raw material receiving or storage equipment.*

Do you still have four baghouses?

The capacities of the surge bins in Figure 4 of the application are different than what is in the permit( 53 and 40 vs. 55 and 60). Is the permit right?

7. Is the sealer listed in the VOC records the sealer referenced in this sentence? - The tiles are then cured and an acrylic sealer is applied to protect the surface pigment from fading.

8. The following is from the EU 005 description.

This emission unit receives reject tile for recycling. Reject tiles are manually placed into a primary hopper with spikes rotating and breaking tile into smaller pieces. Particulate matter emissions from this activity are controlled by water sprays located ????. From the hopper, the material is transported via covered conveyor belt, to a jaw crusher.

Figure 2, Crushing/recycling layout and dust control system indicates that the primary hopper’s dust is controlled by water. I would like to add that to the description above (see in red) but am not exactly sure how that happens. Please fix the sentence in red.

I also added the portion in red below:

“Undersized (“fine”) material is transferred from the enclosed 2-deck shaker screen by covered conveyor belt to the 100 ton bulk crushed tile storage bin/hopper where it is eventually conveyed back to the sand, 10-W aggregate and shale handling system (Emission Unit 001) as raw aggregate.

Is this correct?

9. Is the crushed tile storage bin indicated in Figure 1 – Process flow diagram recycling/crushing system, the same as the object called “fine material” at the top of the page of Figure 2. If not, can you indicate where, on figure 2, that is located? I want to be sure to mention the areas that are controlled by water instead of pick up points .

10. The pickup points listed in the permit (see below) are different that the ones listed in the table that is part of Figure 2 in the new application. Should I change the ones in the permit to match the ones in the table in Figure 2? What does BC stand for?

“The maximum throughput for this emission unit is 30 tons/hour and 78,840 tons/year annually. A dust collection system, with an overall design airflow of 13,600 dscfm and a control efficiency of 99.9%, is used to control particulate matter emissions from this system. The system has a total of 14 dust collector pickup points within the recycle tile crusher system. The points are as follows: (1) Dump hopper; (2) BC-21 feed; (3) BC-22 feed; (4) BC-27 feed; (5) Jaw Crusher inlet; (6) Jaw Crusher discharge / BC-23 feed; (7) BC-25 to BC-23 feed; (8) “Fine Materials” BC-28 feed; (9) BC-24 feed; (10) VSI discharge to BC-24; (11) VSI inlet; (12) Screener inlet; (13) BC-26 feed; and (14) BC-25 feed. Additionally, the dust collector system has a pickup point located at the screen tower in emission unit 001.”

11. Which material is “dustier”, sand or W-10?

12. Will white cement always be in the west silo and grey cement always in the east silo?

13. You submitted a VOC analysis in the response. Which product is this analysis for?

14. Note: Since we are adding W-10 as a material to the permit. It must be added to your recordkeeping.

15. Note: Specific condition D.7.C. states that the VOC content for each material be listed in the monthly records. It can be calculated from the current records, but should also be written once somewhere on the monthly records.

If you have any questions please call me.

Thanks.

Nancy E. Knight  
Engineer Specialist  
Southwest District Air Program  
Department of Environmental Protection  
(813) 632-7600 ext., 120



# Incoming Raw Materials Report

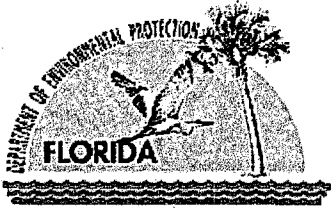
| Date  | Receiver No. | Supplier                 | Quantity Received              | VOC Qty           | VOC/UOM        | Total VOC   |
|---|--------------|--------------------------|--------------------------------|-------------------|----------------|-------------|
| <b>2-White Cement-EU002(West)</b>                           |              |                          |                                |                   |                |             |
| 2/1/2007  | 47213        | Federal White Cement LTD | 24.45 Tons                     | 0.00000           | Not Applicable | 0.00        |
| 2/13/2007   | 47467        | Federal White Cement LTD | 24.84 Tons                     | 0.00000           | Not Applicable | 0.00        |
| 2/13/2007   | 47470        | Federal White Cement LTD | 24.08 Tons                     | 0.00000           | Not Applicable | 0.00        |
| 2/13/2007   | 47535        | Federal White Cement LTD | 24.43 Tons                     | 0.00000           | Not Applicable | 0.00        |
| <b>Summary for 2-White Cement-EU002(West) (4 receivers)</b> |              |                          | <b>Total - All Deliveries:</b> | <b>97.80 Tons</b> |                | <b>0.00</b> |
| VOC Content of 2-White Cement-EU002(West) Not Applicable    |              |                          | <b>Average per Delivery:</b>   | <b>24.45 Tons</b> |                | <b>0.00</b> |



# Incoming Raw Materials Report

| Date  | Receivor No. | Supplier                 | Quantity Received              | VOC Qty            | VOC/UOM        | Total VOC   |
|---|--------------|--------------------------|--------------------------------|--------------------|----------------|-------------|
| <b>2-White Cement-EU002(West)</b>                           |              |                          |                                |                    |                |             |
| 3/7/2007  | 48029        | Federal White Cement LTD | 25.01 Tons                     | 0.00000            | Not Applicable | 0.00        |
| 3/7/2007  | 48030        | Federal White Cement LTD | 24.97 Tons                     | 0.00000            | Not Applicable | 0.00        |
| 3/7/2007  | 48044        | Federal White Cement LTD | 25.23 Tons                     | 0.00000            | Not Applicable | 0.00        |
| 3/7/2007  | 48070        | Federal White Cement LTD | 24.45 Tons                     | 0.00000            | Not Applicable | 0.00        |
| 3/22/2007   | 48378        | Federal White Cement LTD | 25.03 Tons                     | 0.00000            | Not Applicable | 0.00        |
| <b>Summary for 2-White Cement-EU002(West) (5 receivers)</b> |              |                          | <b>Total - All Deliveries:</b> | <b>124.69 Tons</b> |                | <b>0.00</b> |
| VOC Content of 2-White Cement-EU002(West) Not Applicable    |              |                          | <b>Average per Delivery:</b>   | <b>24.94 Tons</b>  |                | <b>0.00</b> |





# Department of Environmental Protection

Charlie Crist  
Governor

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Michael W. Sole  
Secretary

DATE: May 22, 2008

TIME: 1:30 p.m.

LOCATION/CONFERENCE ROOM: Air Section Conference Room 224 – Eagle Roofing Products, LLC

SUBJECT: Eagle Roofing Products, LLC. - Warning Letter No. WL07-0018AS60SWD

## ATTENDEES

| Name                         | Affiliation      | Telephone                | Email                             |
|------------------------------|------------------|--------------------------|-----------------------------------|
| Danielle D. Henry <i>NDH</i> | FDEP/SWD/Air     | (813) 632-7600, ext. 104 | Danielle.D.Henry@dep.state.fl.us  |
| Mara Nasca <i>MGN</i>        | FDEP/SWD/Air     | 813.632.7600, ext. 124   | Mara.Nasca@dep.state.fl.us        |
| Cindy Falandysz <i>CF</i>    | FDEP/SWD/Air     | 813.632.7600, ext. 123   | Cynthia.Falandysz@dep.state.fl.us |
| Danny Stubbs <i>DS</i>       | FDEP/SWD/Air     | 813.632.7600, ext. 159   | Danny.Stubbs@dep.state.fl.us      |
| Nancy Knight <i>NK</i>       | FDEP/SWD/Air     | 813.632.7600, ext. 120   | Nancy.Knight@dep.state.fl.us      |
| Nedin Bahtic <i>NB</i>       | FDEP/SWD/Air     | 813.632.7600, ext. 126   | Nedin.Bahtic@dep.state.fl.us      |
| Shamus Burlingame (by phone) | Eagle Roofing    | 909.208.7339             |                                   |
| STEPHAN NECK                 | AIR CONSTRUCTION | 352 335-1889             | AIRCONSULTV-@BellSouth.net        |
| ROBERT SENA                  | EAGLE ROOFING    | 352-638-5051             | ROBERTS AT EAGLE ROOFING.COM      |
| VICTOR TORLAP                | "                | 909-822-6000 x302        |                                   |
| GARY MANLOVE                 | "                | 303-501-0415             |                                   |



# Department of Environmental Protection

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|-------------------------------------|-------------------------|---------------------------------|--|
| <u>Danielle D. Henry</u> <i>NDH</i> | <u>FDEP/SWD/Air</u>     | <u>(813) 632-7600, ext. 104</u> | <u>Danielle.D.Henry@dep.state.fl.us</u>  |
| <u>Mara Nasca</u> <i>MGN</i>        | <u>FDEP/SWD/Air</u>     | <u>813.632.7600, ext. 124</u>   | <u>Mara.Nasca@dep.state.fl.us</u>        |
| <u>Cindy Falandysz</u> <i>CF</i>    | <u>FDEP/SWD/Air</u>     | <u>813.632.7600, ext. 123</u>   | <u>Cynthia.Falandysz@dep.state.fl.us</u> |
| <u>Danny Stubbs</u> <i>DS</i>       | <u>FDEP/SWD/Air</u>     | <u>813.632.7600, ext. 159</u>   | <u>Danny.Stubbs@dep.state.fl.us</u>      |
| <u>Nancy Knight</u> <i>NK</i>       | <u>FDEP/SWD/Air</u>     | <u>813.632.7600, ext. 120</u>   | <u>Nancy.Knight@dep.state.fl.us</u>      |
| <u>Nedin Bahtic</u> <i>NB</i>       | <u>FDEP/SWD/Air</u>     | <u>813.632.7600, ext. 126</u>   | <u>Nedin.Bahtic@dep.state.fl.us</u>      |
| <u>Shamus Burlingame (by phone)</u> | <u>Eagle Roofing</u>    | <u>909.208.7339</u>             |  |
| <u>STEPHON NECK</u>                 | <u>AIR CONSTRUCTION</u> | <u>352 335 1889</u>             | <u>AIRCONSWD-@BellSouth.net</u>          |
| <u>ROBERT SENA</u>                  | <u>EAGLE ROOFING</u>    | <u>352-638-5051</u>             | <u>ROBERTS AT EAGLE ROOFING.COM</u>      |
| <u>VICTOR TORLAP</u>                | <u>"</u>                | <u>909-822-6000 x302</u>        |  |
| <u>GARY MANLOVE</u>                 | <u>"</u>                | <u>303-501-0415</u>             |  |



# Florida Department of Environmental Protection

Southwest District Office  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

CERTIFIED MAIL – Return Receipt Requested

Mr. Seamus Burlingame, CEO  
Eagle Roofing Products Florida, LLC  
3546 N. Riverside Ave  
Rialto, CA 92377

May 22, 2008

Re: Request for Additional Information  
Initial Air Operation Permit  
Permit Project No.: 1190045-002-AO  
Eagle Roofing Products Florida, LLC

Response  
in  
separate  
folder

Dear Mr. Burlingame:

The Southwest District received your application for an initial Air Operation Permit on May 7, 2008. Based on a review by the Southwest District of the proposed project, we determined that the application is incomplete. Therefore, the following information is needed in order to continue processing this application pursuant to Rules 62-213.420(1)(b) and 62-4.070(1), F.A.C. Please provide any appropriate revised pages of the application form and all assumptions, calculations, and reference material(s) that are used or reflected in any of your responses.

1. General Facility Information

The application states that standard tiles are made of plaster sand and gray cement and lightweight tiles are made of shale and gray cement. During a site visit by DEP personnel on May 19, 2008, it was noted that white cement is also used and that the shale is actually aggregate. Please confirm that the more accurate description of the raw material called shale in the construction permit would be to call it aggregate.

2. Emission Unit Comment, Page 20

The application states grey cement is pneumatically loaded.... Change this description to describe the product in this silo.

3. Emission Unit Comment, Page 37

The application states there are four production lines... Only three of the lines have been constructed. "Four production lines" should be changed to "three production lines" anywhere in the application it is appropriate.

4. Emission Unit Control Equipment, Page 47

This section is not complete. Describe the dust collection system that controls particulate matter emissions for EUs 001, 005 and 006, to include airflow and control efficiency. List each emission point that is controlled by this dust collection system.

5. Emissions Unit Control Equipment, Page 55

The application states that the 100 ton bulk crushed tile storage bin/hopper (EU 006) is equipped with a baghouse filter to control particulate matter emissions. During the site visit it was observed that this emission unit does not have a separate baghouse. Revise this section to describe how the particulate matter emissions are actually controlled. Include the impact of adding this emission unit to the dust collection system for EUs 001 and 005. Since this emission unit does not have its own control device, the crushed tile storage bin/hopper could be included in EU 005.

6. Specific Condition A20 of Construction Permit 1190045-001-AC

This specific condition requires that test reports and 2 months of recordkeeping be submitted with the operation permit application. These documents were submitted with the application, but were not complete.

a. The test reports did not include the following:

EU 001

- copy of the daily log for the test day;
- total quantity of material transferred during VE test (in tons);
- description of how the quantity of materials transferred is determined;

EU 004

- actual combined sand and cement transfer rate during emissions testing;
- total quantity of sand transferred during test (in tons);
- total quantity of cement transferred during test (in tons);

b. The recordkeeping records did not include the following:

EU 001 - daily

- quantity of sand transferred (in tons);
- quantity of shale transferred (in tons);
- quantity of recycled material transferred (in tons);
- description of how the quantity of materials transferred is determined;
- total quantity of material transferred (in tons);
- total hours of operation;

EU 001 - monthly

quantity of shale transferred during the month (in tons);  
quantity of recycled material transferred during the month (in tons);  
total quantity of material transferred during the month (in tons);  
total quantity of material transferred during the last 12 consecutive month period  
(in tons);

EUs 002 and 003

description of how the quantity of cement loaded is determined;  
total quantity of cement loaded for the facility during the month (in tons);  
total quantity of cement loaded for the facility during the last 12 consecutive (in  
tons).

EU 004

The VOC records stated 0.0 VOCs were emitted during January and February  
2008, while mold release compound was used. See Specific Condition D7 as to what  
VOC records should have been submitted with the permit application

EU 005

See Specific Condition E9 as to the information required in the records for this emission  
unit.

Please submit the missing information.

SAN BERNARDINO, CA 92410  
UNITED STATES POSTAL SERVICE

27 MAY 2008 PM 3



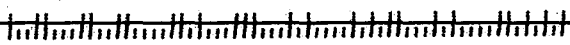
First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box. **Dept. Of Environmental Protection**

**MAY 30 2008**

**Southern District**

Dept. of Environmental Protection  
Air Resource Management  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926



**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:**

Seamus Burlingame, CEO  
 Eagle Roofing Products Florida LLC  
 3546 N. Riverside Avenue  
 Rialto, CA 92377

1190045-002-AO Req for Add'l Info  
 NK 05/22/2008

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

*[Handwritten Signature]*

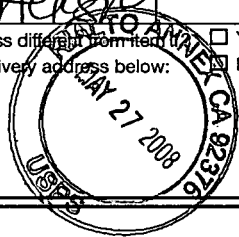
- Agent
- Addressee

**B. Received by (Printed Name)**

*[Handwritten Name]*

**C. Date of Delivery**

- 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**

(Transfer from service label)

1190045002AO NK 052208 7007 0710 0003 0038 9011

7. Construction Permit Requirement

A construction permit application is required to remove the baghouse from Emission Unit 006 and possibly include the silo with Emission Unit 005. This construction permit will be processed concurrently with the operation permit.

If you would like to extend the expiration date of the current construction permit, 1190045-001-AC, to allow more time to build the forth tile production line, please submit a letter requesting such along with a check for \$50.00.

Professional Engineer (P.E.) Certification Statement - Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. As a result your response should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page with your response.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter pursuant to Rule 62-213.420(1)(b)3., F.A.C. If you should have any questions, please contact Ms. Nancy E. Knight at 813 632-7600, ext. 120.

Sincerely,

*Nancy E. Knight*

Nancy E. Knight  
Air Permit Engineer Specialist  
Southwest District

copy to: Mr. Eric Carlson  
Kleinfelder  
1601 S.W. 41<sup>st</sup> Street  
Topeka, KS 66609

|  |  |
|--|--|
| U.S. Postal Service™   |  |
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| Reti (Endorse)<br>Restrict (Endorse)   | Seamus Burlingame, CEO<br>Eagle Roofing Products Florida LLC<br>3546 N. Riverside Avenue<br>Rialto, CA 92377 |
| Total P  | 1190045-002-AO Req for Add'l Info  |
| Sent To  | NK 05/22/2008  |
| Street, Apt. No.,<br>or PO Box No.   |  |
| City, State, ZIP+4   |  |
| PS Form 3800, August 2006  |  |
| See Reverse for Instructions   |  |





Eagle Roofing Products  
A division of Burlingame Industries, Inc.

January 4, 2007

Dept. of Environmental  
Protection

JAN 09 2007

*Corporate Office*  
3546 N. Riverside Ave.  
Rialto, CA 92377  
Phone 909 822 6000  
Fax 909 822 3516

*Manufacturing  
and Showrooms*

*Southern California*  
2352 N. Locust Ave.  
Rialto, CA 92377  
Phone 909 355 7000  
Fax 909 355 2331

*Northern California*  
4555 S. McKinley Ave.  
Stockton, CA 95206  
Phone 209 932 2700  
Fax 209 234 4366

*Southwest*  
4602 W. Elwood St.  
Phoenix, AZ 85043  
Phone 602 346 1700  
Fax 602 442 8841

*Florida*  
Eagle Roofing Products  
Florida LLC  
1575 E. C R 470  
Sumterville, FL 33585  
Phone 877 300 3245  
Fax 877 300 3248

**Southwest District**

Mr. Danny Stubbs  
Environmental Engineer Specialist III  
Florida Department of Environmental Protection  
Division of Air Resource Management  
Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

Re: Eagle Roofing Products Florida LLC / Sumter County  
Final Permit No. 1190045-001-AC

Dear Mr. Stubbs:

This letter will serve as initial start-up notification for Eagle Roofing Products Florida LLC, as required by condition No. A13 of the air permit. On Wednesday, December 27, 2006, production began on tile line #17.

As we commission equipment, we will notify the department. Additionally, we are working on a schedule for the equipment testing, and we will notify the department per requirements of the permit.

If you have any questions, please contact me at any time at 909.822.6000 X302.

Sincerely,

**EAGLE ROOFING PRODUCTS FLORIDA LLC**

Victor Torcat Mallen

VTM/ke  
cc: Seamus Burlingame, CEO  
Carl Riddlemoser, Kleinfelder  
fl/fdeppermits