

Application Routing and Transmittal Sheet

Air Permitting Supervisor - Required Information for Project Setup by Admin		
Owner/(Facility Name, if needed):	Eagle Roofing Products of Florida LLC	Facility ID No.: New 1190045
New Facility (Y/N):	Y	Relocatable (Y/N): N
Project Name:	AC for roofing tile manufacturing	
Type/Subtype:	AC00	Received: 9/15/06
Fee Submitted:	<input checked="" type="checkbox"/> correct <input type="checkbox"/> incorrect <input type="checkbox"/> na	Should Be \$ 2000
Fee Checked By:	Cz	Submitted \$ 2000
Date:	9/18/06	Override Reason (if needed): multiple sources
		Needed/Refund \$

Admin - Project Setup Information		
Project No.:	001	Initial ARMS Entry (Initials & Date): SW 9/19/06
		Virus Scan Date:

Air Permitting Supervisor - Application Information		
Application Assigned To:	DS	Date: 9/18/06
No. of Hardcopies:	4	No. of Disks: 1
		Confidential Information (Y/N): N
Application Distribution (hardcopy/EPSP):	DEP Engineer: 4	County: n/a Other: n/a

Compliance/Enforcement Review (review marked by supervisor)		
Permitting Supervisor - Email sent for application review/comments:	1190045-001-AC	
Permitting Supervisor - Copy of transmittal sheet to Nancy Knight (new facility)?	Y	
Permitting Supervisor - Draft Permit review? (Y/ED):	ed	Compliance: Enforcement:

Air Permitting - Permit Transmittal (add initials & date completed)		
Permit No.:	Intent/Draft	Final
1190045-001-AC		
Engineer zipfile name on drive	DS 11/19/06 1190045.001.AC.D.zip	DS 12/22/06 1190045.001.AC.F.zip
Engineer → permit reviewer	DS 11/17/06	
Permit reviewer → permit supervisor	mc 11-21-06	12/22/06 DS
Permit supervisor → DAPA	cf 12/1/06	cf 12/22/06
DAPA → clerk/engineer	MON 12-04-06	MON 12-22-06
Permit Package Mailed/Emailed	cm 12/05/06	12-22-06
ARMS Events Entry	12/06/06	12-22-06
Posted to DEP Website		12-22-06
Copy to Interested Party (Y/N)	12/25/06 cm	12-22-06

Day 30/60/90:
~~30~~
 2/09/07

Air Permitting Supervisor - Data Fields for Access System (add at final issuance)		
Issue Date:		
Facility Description:	Other	Source Description: MATERIAL HANDLING
296:	MACT:	NSPS: 000
Fuels:	Control Equipment: Baghouse	
Project Description/Comments:	Roofing tile manufacturing facility.	

Air Permitting - System Updates (add filenames/add initials & date completed)		
Engineer - Final Permit Copied (read only) to Air Common\Permits\PermitXX\	1190045.001.AC.F.doc DS 12/2/06	
Permitting Clerk - Permit List Data Entry (Access):	12-22-06	
Engineer - ARMS Inventory Data Entry:	Permitting Clerk:	

Special Routing	
Permitting Supervisor - Send final permit to compliance section? (Y/N)	Y

Prickett, Patricia

From: Nasca, Mara
Sent: Friday, December 22, 2006 12:58 PM
To: Bahtic, Nedin; Bradley, Christopher; Galbraith, Bret; Harwood, Roy; Henry, Danielle D.; Janis, Neal; Knight, Nancy; McDonald, Jim; Moore, Carol; Nacol, David; Nasca, Mara; Noor, Quaid; Novak, Linda; Panetta, Joe; Prickett, Patricia; Hughes, Rhonda; Schroeder, Bill; Simmons, Wendy; Soich, Robert; Stubbs, Danny; Zell, David; Zhang-Torres
Cc: Vazquez, Pamala
Subject: FW: Eagle Roofing Final Permit

From: Gary Manlove [mailto:garym@eagleroofting.com]
Sent: Friday, December 22, 2006 12:41 PM
To: Zhang-Torres; bibob@BurlingameIndustries.com; Garym@eagleroofting.com
Cc: Nasca, Mara
Subject: Re: Eagle Roofing Final Permit

Cindy & Mara:

THANK YOU for the final notification!

We appreciate ALL the efforts by you and the TEAM at DEP!

This is a GREAT XMAS present.

Thanks

Gary M.

Zhang-Torres <Cindy.Zhang-Torres@dep.state.fl.us> wrote:

Mr. Burlingame and Mr. Manlove,

The Final Air Construction Permit for Eagle Roofing is in today's mail. The signed Final Permit has been scanned and attached to this email. The attachments to the final permit are not in the scanned document but are mailed out to Mr. Seamus Burlingame in a hardcopy. Please contact me if you have further questions regarding this matter.

Cindy Zhang-Torres, PE III
Air Permitting Supervisor
FDEP
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813)632-7600, ext. 107
Fax: (813)632-7668

Gary Manlove
Eagle Roofing Products Florida LLC

12/22/2006



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

"More Protection, Less Process"

Printed on recycled paper.

MEMORANDUM

To: Mara Grace Nasca
District Air Program Administrator

Through: Cindy Zhang-Torres, P.E. *CJ*
Air Program Permitting Supervisor

From: Danny Stubbs *DS*

Date: 12/22/2006

Subject: Permit recommendation for Eagle Roofing Products Florida LLC (1190045-001-AC).

I recommend permit 1190045-001-AC for Eagle Roofing Products Florida LLC be issued.

There have been only minor changes to the permit as it was originally proposed with the Intent to Issue. These changes included minor corrections and the addition of language to the "VE Test Method" in Specific Condition Nos. B4 and E6. This language was added because these Specific Conditions only addressed the initial VE test and not subsequent test.

The public notice was properly published on December 7th, 2006, as required and as of this date no comments have been received.

Additionally, the Intent to Issue was delivered via certified mail on December 09, 2006, to the third party, Ms. Sandra Glenn, P.E., MonierLifetile LLC. The Department received an email from Ms. Glenn on December 18, 2006, stating MonierLifetile would not be submitting comments on the permit.

On December 13, 2006, Jim McDonald and I met with representatives of Eagle Roofing Products Florida LLC, to review the conditions of the permit and answer any resulting questions. They did not have any issues regarding the conditions of the permit and felt comfortable with the limits and requirements.

Events Scheduled

50 of 90

AIRS ID **1190045** Site Name **EAGLE ROOFING PRODUCTS FLORIDA LLC**
 Permit # **1190045-001-AC** Type/Subtype **AC** / **00** Received **09/15/2006**
 Project # **001** Project Name **(AC FOR ROOFING TILE MFG)**

> STOP CLOCK: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Awaiting Additional Information	10/06/2006	90	01/04/2007		Received	10/25/2006
Completeness Review	10/25/2006	30	11/24/2006		Complete	11/09/2006
Determine Agency Action	10/25/2006	90	01/23/2007		Issue	12/05/2006
Mail Public Notice of Intent to Applicant and Date of Publication	12/05/2006	10	12/15/2006		Done	12/05/2006
Awaiting Petition for Administrative Proci	12/05/2006	999	08/30/2009		Published	12/07/2006
Issue Final Permit	12/07/2006	14	12/21/2006		Not Received	12/21/2006
ISSUE PERMIT	12/21/2006	14	01/04/2007		Issued	12/22/2006
STOP CLOCK	12/22/2006	1	12/23/2006		Issued	12/22/2006
ARMS Data Entry	12/22/2006	40	12/23/2006		Done	12/22/2006
STOP CLOCK	12/22/2006	1	01/31/2007		Done	01/11/2007
STOP CLOCK	12/05/2006	1	12/06/2006		Done	12/05/2006



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

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Emission Unit Details

EU No	Description
001	Sand and Shale Receiving and Handling
002	Cement Storage Silo 1
003	Cement Storage Silo 2
004	Tile Production Building
005	Reject Tile Recycling Crusher System
006	100 Ton Bulk Crushed Tile Storage Bin



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Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

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MEMORANDUM

To: Mara Grace Nasca
District Air Program Administrator

Through: Cindy Zhang-Torres, P.E. *cf*
Air Program Permitting Supervisor

From: Danny Stubbs *DS*

Date: 11/30/2006

Subject: Permit recommendation for Eagle Roofing Products Florida LLC (1190045-001-AC).

I recommend the Intent to Issue for Eagle Roofing Products Florida LLC be signed.

On September 15th, 2006, the Department received an application from Eagle Roofing Products Florida LLC requesting an air construction permit allowing them to construction a new, non-Title V concrete roof tile manufacturing facility with a design capacity of approximately 315 million tiles per year. This is a facility that began constructing without an air construction permit and applied after the construction was nearly complete.

On October 6th, 2006, a request for additional information letter was mailed regarding particulate matter and VOC emission calculations. Additional clarification of several process description items was also requested. A response letter addressing these issues was received form Eagle Roofing Products Florida LLC on October 25th, 2006.

Cindy-Zhang Torres and I visited the facility on October 16th, 2006, to verify the accuracy of the application. Although, many items were not complete at the time of the visit, it was evident that the items that were completed were being constructed as described in the application.

On October 23rd, 2006, the Departments received a request via email from Sandra Glenn of Monierlifetile LLC, requesting that she be added as a third party in the Eagle Roofing permit process. In addition to the mailing copies of permit 1190045-001-AC to the owner and professional engineer of Eagle Roofing Products Florida LLC, a copy will also be mailed to Sandra Glenn.

Monierlifetile LLC, obtained a copy of the Eagle Roofing Products Florida LLC permit application. On November 13th, 2006, the Department received a letter from Sandra Glenn of Monierlifetile LLC regarding the permit application. In this letter, the need to use petroleum based mold release oils and the calculation methods used to determine particulate matter and VOC emissions were questioned.

Stubbs, Danny

From: Zhang-Torres
Sent: Tuesday, December 19, 2006 1:35 PM
To: Stubbs, Danny
Subject: FW: Eagle Permit

From: Nasca, Mara
Sent: Tuesday, December 19, 2006 1:28 PM
To: Comer, Patricia
Cc: Getzoff, Deborah; Zhang-Torres; Bradley, Christopher
Subject: FW: Eagle Permit

Pat,
This email from Sandra Glenn pertains to the construction permit for Eagle Roofing, it appears Monierlifetile will not be requesting an Administrative Hearing.
Thanks,
Mara

From: Sandra Glenn [mailto:SGlenn@Monierlifetile.com]
Sent: Monday, December 18, 2006 5:37 PM
To: Nasca, Mara
Subject: Eagle Permit

Just a note to make you aware we will not be submitting comments on the permit.

Regards,
Sandra
C: 949-981-3319
F: 949-585-8964



Tuesday, December 12, 2006

Mara Grace Nasca
Department of Environmental Protection
District Air Program Administrator
Southwest District
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

D.E.P
SOUTHWEST DISTRICT
DEC 13 2006
TAMPA

RE: In reference to your questions posed in your email of Friday, December 8, 2006, we submit the following:

Dear Ms. Nasca,

Sample tile produced for code approval:

We mixed bagged cement and sand in a portable mixer on-site. This was hand-fed into our tile extruder that was powered by a portable generator. The molds were hand-fed onto the extruder, concrete was extruded onto the molds, and tiles on the molds were hand-loaded into a metal rack for curing. This rack was covered with a plastic tarp and natural convection began the concrete hydration process. The temperature was over 95 degrees during the day and no additional heat was required for this process.

In order to attain the required yield of 15 tiles per profile for each of the three profiles submitted to Miami-Dade County, a total of 125 tiles were produced and cured. This required three small batches of concrete from the small portable mixer mentioned above.

**Eagle Roofing Products Florida LLC
1575 East C.R. 470, Sumterville, Florida 33585
(877) 300-3245**



The entire amount of aggregate and cement used in this process was less than 1500 pounds.

To put our sample process in perspective, at full production a single machine will produce 150 tiles per minute or 9,000 tiles per hour. This equates to a rough combined cement-aggregate usage of over 90,000 pounds per hour. In a production environment, the amount of aggregate required to manufacture 150 tiles per minute, per line, mandates an extensive material handling, conveying, mixing and metering process. These processes require dust collection and automated machinery.

Curing, in order to standardize colors and to facilitate timely de-molding of the product must also be highly controlled in a production environment. While ideal tile curing takes place in an environment with high humidity and temperatures between 90 and 110 degrees Fahrenheit, such conditions can not be counted on (in an ambient environment), and must be created and maintained in a curing chamber. These chambers, using propane burners and humidity control systems have been built on-site, but were not completed nor were they used in our samples process.

Roof tile production revolves around the extruder. In the space of just eight feet, concrete is extruded onto an aluminum mold, cut to length, and punched with nail holes. With the exception of curing, all processes are complete as far as the product is concerned and virtually all other equipment in a roof tile plant is used to facilitate high-speed production. By using the exact extruder from line 17 along with local cement and



aggregates for our sample tiles we have satisfied the requirements of Miami-Dade County for code approvals.

Information in the aforementioned procedures is of a proprietary nature and we trust that this information will not be distributed beyond your state agency.

Sincerely,

A handwritten signature in black ink, appearing to read "Seamus Burlingame". The signature is fluid and cursive, with a prominent initial "S" and a long, sweeping underline.

Seamus Burlingame, CEO

Eagle Roofing Products Florida LLC

**PUBLIC NOTICE OF INTENT
TO ISSUE AIR PERMIT**

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1190045-001-AC
Eagle Roofing Products Florida LLC

Sumter County

The Department of Environmental Protection (Department) gives notice of its intent to issue an after-the-fact air permit to Eagle Roofing Products Florida LLC, for the facility located at 1575 East County Road 470, Sumterville, Sumter County. The permit authorizes Eagle Roofing Products Florida LLC to construct and begin initial operation of a concrete roof tile manufacturing facility with a design capacity of approximately 315 million tiles per year. This facility will have the capability of manufacturing standard concrete roof tiles, comprised of plaster and gray cement; and lightweight concrete roof tiles, comprised of shale and gray cement. The primary pollutants generated at this facility include volatile organic compounds (VOC) and particulate matter. This facility will be subject to a VOC emissions limitation of 25 tons per any consecutive 12-month period. 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 permit 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 Air Permit. 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 permit and require, if applicable, another Public Notice.

The Department will issue the final permit 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.

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 32399-3000. 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.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (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 how and when petitioner received notice of the agency action or proposed action; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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 action, 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 permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara Grace Nasca, District's 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 permit draft, 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 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Permit." 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 Nas-

ca (phone no. 813-632-7600) referencing the DEP file number 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 permit and require, if applicable, another Public Notice.

08514332 December 7, 2006

The Villages
DAILY SUN

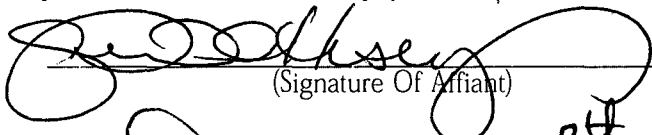
Published Daily
Lady Lake, Florida
State of Florida
County Of Lake

Attach Notice Here

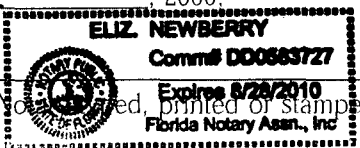
Before the undersigned authority personally appeared
April Hisey, who on oath
says that she is Legal Ad Coordinator of the DAILY SUN,
a daily newspaper published at Lady Lake in Lake
County, Florida with circulation in Lake, Sumter and
Marion Counties; that the attached copy of
advertisement, being a Legal Ad # 08514332
in the matter of Notice of Intent to Issue Air Permit

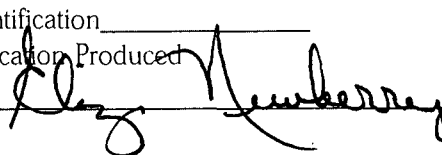
in the _____ court, was published in said
newspaper in the issues of December 7, 2006

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 7th
day of Dec, 2006.

(Name of Notary Public, Printed or Stamped)


Personally Known _____ or
Production Identification _____
Type of Identification Produced _____


Gary Manlove
 1575 East C.R. 470
 Sumterville, Florida 33585

Eagle Roofing Products Florida LLC

FAX

To:	Danny Stubs / Permit Engineer FDEP	From:	Gary Manlove Director of Manufacturing
Fax	813.632.7668	Fax	352.568.7558
Phone		Phone	352.552.8380
RE:	AD Placement Notice	CC	Bob Burlingame, Victor Torcat
		Pages	4

Danny

Thank you for the update regarding the # of days the AD would need to run. We placed the AD in "The Villages Dailey Sun" and it ran on December 7th as required. I have attached the cover page of the newspaper and the dated AD.

As agreed, this fax will serve as notice that the AD ran on the 7th and we will bring official document with us next week when we meet.

Thanks again for the clarification and please call me with any questions.

Thanks
 Gary

12/8/2006



Three finalists

Two quarterbacks, one running back in the mix for the Heisman trophy.

Sports B1

Weather

P.M. Showers

Hi: 73 Lo: 39

Complete Forecast C2



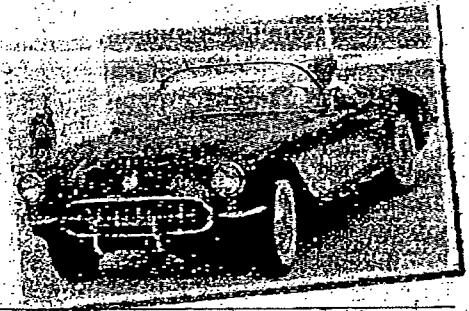
Still fine at 50!

Classic 1956 Corvette convertible has been a labor of love for Villager Lorin Slauson.

Wheels E1

The Villages

DAILY SUN



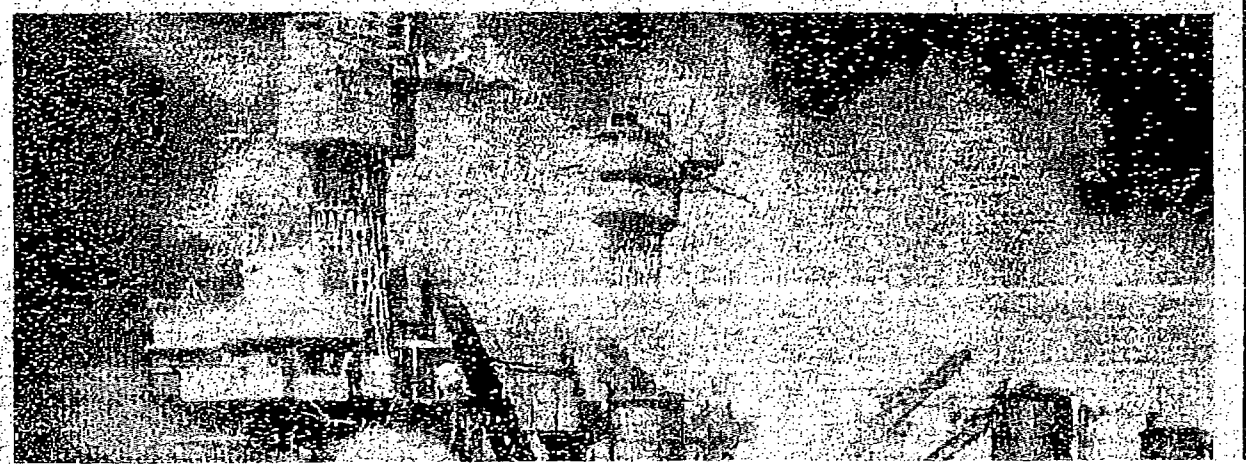
THURSDAY, DECEMBER 7, 2006

WWW.THEVILLAGESDAILYSUN.COM

THE VILLAGES

COURAGE UNDER FIRE

ATTACK ON PEARL HARBOR STILL VIVID IN VILLAGER'S MEMORY



Washington

Iraq panel: Bush's war policies have failed

Commission urges 'diplomatic offensive,' switch from combat

By ANNE GEARAN
THE ASSOCIATED PRESS

WASHINGTON — President Bush's war policies have failed in almost every regard, the bipartisan Iraq Study Group concluded

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100 LEGAL NOTICES

ca (phone no. 813-632-7600) referencing the DEP file number 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 permit and require, if applicable, another Public Notice.

08514332 December 7, 2006

VILLAGE COMMUNITY DEVELOPMENT DISTRICT NO. 5

The regular meeting of the Board of Supervisors of the Village Community Development District No. 5 will be held on Friday, December 15, 2006 at 8:30 A.M. at the Sumter Landing District Office, 1894 Laurel Manor Drive, The Villages, Florida. The meeting is open to the public and will be conducted in accordance with the provisions of Florida Law for Community Development District. The agenda may be viewed at the Sumter Landing District Office, 1894 Laurel Manor Drive, The Villages, Florida 32162.

Any person requiring special accommodations at this meeting because of a disability...

100 LEGAL NOTICES

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 action, 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 permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara Grace Nasca, District's 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

100 LEGAL NOTICES

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.

A petition that disputes the material facts on which the Department's action is based must contain the following information (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 how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petitioner must

100 LEGAL NOTICES

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 Air Permit. 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 permit and require, if applicable, another Public Notice.

The Department will issue the final permit 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. 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 De-

100 LEGAL NOTICES

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 1190045-001-AC
Eagle Roofing Products Florida LLC

Sumter County
The Department of Environmental Protection (Department) gives notice of its intent to issue an after-the-fact air permit to Eagle Roofing Products Florida LLC, for the facility located at 1575 East County Road 470, Sumterville, Sumter County. The permit authorizes Eagle Roofing Products Florida LLC to construct and begin initial operation of a concrete roof tile manufacturing facility with a design capacity of approximately 315 million tiles per year. This facility will have the capability of manufacturing standard concrete roof tiles, comprised of plaster and gray cement; and lightweight concrete roof tiles, comprised of shale and gray cement. The primary pollutants generated at this facility include volatile organic compounds (VOC) and particulate matter. This facility will be subject to a VOC emissions limitation of 25 tons per any consecutive 12-month period. 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 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 Air Permit. 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 permit and require, if applicable, another Public Notice.

Florida LLC to construct and begin initial operation of a concrete roof tile manufacturing facility with a design capacity of approximately 315 million tiles per year. This facility will have the capability of manufacturing standard concrete roof tiles, comprised of plaster and gray cement; and lightweight concrete roof tiles, comprised of shale and gray cement. The primary pollutants generated at this facility include volatile organic compounds (VOC) and particulate matter. This facility will be subject to a VOC emissions limitation of 25 tons per any consecutive 12-month period.

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 permit 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



parment shall revise the proposed permit and require, if applicable, another Public Notice.

The Department will issue the final permit 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.

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 32399-3000. 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

06.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (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 how and when petitioner received notice of the agency action or proposed action; (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; and (g) A statement of the relief sought by the petitioner, stating precisely the action 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

ble 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 permit, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Mara Grace Nasca, District's 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 permit draft, 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 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Permit." 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 Nas-

The regular meeting of the Board of Supervisors of the Village Community Development District No. 5 will be held on Friday, December 15, 2006 at 8:30 A.M. at the Sumter Landing District Office, 1894 Laurel Manor Drive, The Villages, Florida. The meeting is open to the public and will be conducted in accordance with the provisions of Florida Law for Community Development District. The agenda may be viewed at the Sumter Landing District Office, 1894 Laurel Manor Drive, The Villages, Florida 32162.

Any person requiring special accommodations at this meeting because of a disability or physical impairment should contact the District Office at (352) 751-6700 at least five calendar days prior to the meeting.

Each person who decides to appeal any action taken at these meetings is advised that person will need a record of the proceedings and that accordingly, the person may need to ensure that a verbatim record of the proceedings is made, including the testimony and evidence upon which such appeal is to be based.

Peter F. Wahl
District Manager
#01587484 December 7, 2006

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MEMORANDUM

To: Mara Grace Nasca
District Air Program Administrator

Through: Cindy Zhang-Torres, P.E. *Y*
Air Program Permitting Supervisor

From: Danny Stubbs *D.S.*

Date: 11/30/2006

Subject: Permit recommendation for Eagle Roofing Products Florida LLC (1190045-001-AC).

I recommend the Intent to Issue for Eagle Roofing Products Florida LLC be signed.

On September 15th, 2006, the Department received an application from Eagle Roofing Products Florida LLC requesting an air construction permit allowing them to construction a new, non-Title V concrete roof tile manufacturing facility with a design capacity of approximately 315 million tiles per year. This is a facility that began constructing without an air construction permit and applied after the construction was nearly complete.

On October 6th, 2006, a request for additional information letter was mailed regarding particulate matter and VOC emission calculations. Additional clarification of several process description items was also requested. A response letter addressing these issues was received form Eagle Roofing Products Florida LLC on October 25th, 2006.

Cindy-Zhang Torres and I visited the facility on October 16th, 2006, to verify the accuracy of the application. Although, many items were not complete at the time of the visit, it was evident that the items that were completed were being constructed as described in the application.

On October 23rd, 2006, the Departments received a request via email from Sandra Glenn of Monierlifetile LLC, requesting that she be added as a third party in the Eagle Roofing permit process. In addition to the mailing copies of permit 1190045-001-AC to the owner and professional engineer of Eagle Roofing Products Florida LLC, a copy will also be mailed to Sandra Glenn.



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

P.E. CERTIFICATE STATEMENT

PERMITTEE

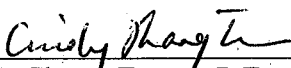
Eagle Roofing Products Florida LLC

Draft Air Permit No. 1190045-001-AC

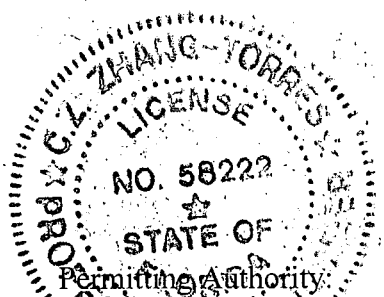
Project Type: AC00

Permit Description: after-the-fact construction permit for a new roofing tile manufacturing facility.

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).


C.Z. Zhang-Torres, P.E.
License Number: 58222

12/1/06
Date



Permitting Authority:
EDER Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600
Fax: 813-632-7668

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Owner: EAGLE ROOFING PRODUCTS FLORIDA LLC
Site Name: EAGLE ROOFING PRODUCTS FLORIDA LLC
Street: 1575 East County Road 470
Title V: N **County:** SUMTER
City: SUMTERVILLE **Zip Code:** 33585
Major Group SIC: 32 -- STONE, CLAY, GLASS AND CONCRETE PRODUCTS

Update Existing Permit Summary Records:

<u>Permit Number</u>	<u>Permit Activity</u>	<u>Date Received</u>	<u>Agency Action</u>
1190045-001-AC	Construction	9/15/2006	Issue
Project Name: AC FOR ROOFING TILE MFG			Add_Rev_Draft
Primary Processor: STUBBS_D			Add_Final
Update--> Draft			

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Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

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200 Story Road
Lake Wales, FL 33853
PO Box 632
Lake Wales, FL 33859

tel: 863-676-9405
fax: 863-678-1432

October 31, 2006

Dept. of Environmental Protection

Florida Department of Environmental Protection
Southwest District
Air Program
3804 Coconut Palm Drive
Tampa, Florida 33619

NOV 13 2006

Re.: Eagle Roofing Products Florida LLC
Sumterville, Florida
Permit Application received September 15, 2006

Southwest District

Dear Sir/Madam:

MonierLifetile has obtained a copy of the above referenced permit for review. While we are confident in the Department's ability to review, I am listed in the permit as a reference regarding mold oil usage and want to clarify the issue and request information on the Department's permitting decision as they could affect our future permitting.

1. Please note that we disagree (and I am listed as a reference) in the need to use petroleum hydrocarbon based (such as motor oil) for a mold release oil as listed in the attachment (titled Estimation of Potential VOC Emissions from Mold Release Oil Use) to the permit. As we provided information to San Joaquin County, California (also listed as a reference), their BACT analysis (attached) determined petroleum hydrocarbon based mold release oils are not best available control technology.
2. In the calculation of Particulate emissions, Eagle is using the emission factors from Sand and Aggregate Storage Piles (AP 42 Chapter 13.2.4) which were developed specifically for storage piles instead of utilizing the AP42 factors (Concrete Batching, Chapter 11.12) which was developed specifically for concrete production. MLT would like clarification if this is an acceptable method of emissions calculations for this type of operation and will the DEP accept it for use in the annual emissions reporting in Florida as this significantly reduces the emissions permitted and reported.
3. In the calculation of emissions factors from mold oil usage, Eagle is using an EPA evaporation calculation rather than using the total VOC contents or EPA Method 24 (though it does not perform well on acrylic water based systems). This calculation does not take into account evaporation from any source or fraction other than the potential overall VOC emissions of the mold oil on exposed edges of the mold. Other sources such as overspray, volatilization during spraying, volatilization of lighter fractions prior to volatilization of the oil itself, etc. are considered negligible. Eagle utilized the same approach in the permitting in San Joaquin County, California where the agency simply put into place a limit on the VOC content of the mold oil to the vegetable based material known generically as "bio-diesel" which is the same material proposed for the main line at Eagle. MLT would like clarification if this is an acceptable method of emissions calculations for this type of operation and will the DEP accept it for use in the annual emissions reporting in Florida as this significantly reduces the emissions permitted and reported.

Just a note from our review of the permit application: though minor inconsistencies were noted in various areas one issue was noted which is not obvious. The permit application states that Eagle has installed two silos each



MonierLifetile
Changing the way people think about roofs.

200 Story Road
Lake Wales, FL 33853
PO Box 632
Lake Wales, FL 33859

tel: 863-676-9405
fax: 863-678-1432

with a dust collector. Their standard is to put in two split silos with two dust collectors per silo. Based on the photographs of the site, that is what has been put into place in this case so a correction will need to be noted.

If you have any questions or comments regarding these clarifications, please contact me via email at sglenn@monierlifetile.com or 949.981.3319. Otherwise I look forward to your letter.

Sincerely,
MonierLifetile LLC

Sandra L. Glenn, PE
National Safety and Environmental Manager

Attachment

BACT ANALYSIS
New BACT Guideline 6.2.X
Conveyorized Concrete Roof Tile Manufacturing Line - Trim Tile Mold
Releasing Oil Application Operation

Facility Name: Eagle Roofing Products

January 25, 2005

Mailing Address: 3546 N. Riverside Avenue
Rialto, CA 92377

Contact Person: Victor Torcat Mallen

Telephone: (909) 822-6000. Ext. 302

Application #: N-5998-6-0

Project #: N1042616

Deemed Complete: November 8, 2004

I. Proposal

The applicant is applying for an Authority to Construct (ATC) permit for a concrete roof tile manufacturing line #16 consisting of the following: mold release applicator; sand, shale, & cement surge bins; metering conveyors; four premixers; two mixing conveyors; tile extruder; tile trimmer, color slurry applicators; antiquer color slurry applicators; ten curing enclosures served by a 0.95 MMBtu/hr natural gas fired low NOx burners; sealer application booth; depallater and packaging system. The cement surge bin, metering screw, premixers, mixing conveyors, and slurry mixer are served by an AP Engineering, Inc. Model #CS 49-10 dust collector.

II. Process Description

Upon demand generated by operation of the roofing tile manufacturing lines, sand or shale will be conveyed from the base of the 200-ton surge bin and transferred via covered conveyors into one of two 55-ton surge hoppers (one container each for sand and shale). Upon demand, gray cement is automatically conveyed from the cement storage silo and transferred via enclosed screw conveyor into a 60-ton surge hopper. The 55-ton sand, 55-ton shale, and 60-ton cement surge hoppers are common to the four roofing tile manufacturing lines. Particulate matter emissions from the filling of the 60-ton cement surge hopper will be controlled by the dust collectors serving the roofing tile manufacturing lines.

Sand or shale is released from the surge bin to separate open "metering conveyor belts" for each individual roofing tile line, cement is released from the surge bin to an enclosed screw conveyor onto a separate, enclosed metering belt for each individual roofing tile line. From the metering conveyors sand or shale and cement is dropped onto a raw material conveyor belts for each roofing tile line. Sand or shale and cement on the raw material conveyor belt are "premixed" using four beaters. Baghouses (one for each process line) will be used to collect dust emissions from the dropping of the cement on the line and mixing of the cement and sand or shale.

Eagle Roofing Products

The premixed raw material will then be transported via the raw material conveyors (one for each roofing tile line) onto two mixing conveyors (two for each roofing tile line) and is mixed using 18 beaters (9 beaters per mixing conveyor) with water and calcium chloride to create a slurry that is used to form roofing tiles. Colored pigment can be added here if "color-through" tiles (i.e., have a uniform color throughout the interior and exterior of the tile) are being produced and Eaglelite (a surfactant) can also be added here if lightweight tile is being produced. The baghouse serving each individual roofing tile line will be used to collect dust emissions generated from the dropping of raw material onto the mixing conveyors.

The mixture of sand or shale, cement, calcium chloride, Eaglelite, and pigment slurry will be conveyed from the mixing belt to the tile extruders where the mixture will be molded into a wet tile and placed on a mold to which a mold release oil has been applied. Two mold release oils will be used at the facility: a "low-VOC" vegetable oil compound (E-46 mold oil) with a VOC content of 0.04 lb/gal (less water & exempt compounds) and a naphthenic distillate compound (Eagle #3 mold oil) with a VOC content of 0.07 lb/gal (less water & exempt compounds). The vegetable oil compound is used on all roofing tile types with the exception of the "trim" tile. The 90 degree corner shape of the trim tile prevents the high viscosity vegetable oil compound from staying on the top corner surface of the trim tile. This will result in the trim tile sticking to the metal mold. However, the naphthenic distillate oil compound has a lower viscosity and is able to stick to the top corner surface of the trim tile, which prevents the trim tile from sticking to the metal mold. The naphthenic distillate oil is used exclusively for the production of the trim tiles.

Mold release oil will be applied to the surface of the mold using a spray tip applicator. Application of the mold release will occur inside an enclosure mounted on the manufacturing conveyor immediately preceding the tile mixture extruder. The enclosure is utilized to capture and reuse the overspray mold release oil, which will help reduce the usage of the mold release oil.

Following extrusion of the tile, the tile will pass through a tile trimmer, where excess material will be removed from the edges of the wet tile. A conveyor belt located under the production conveyors will collect waste tile material that has fallen from the trimmer and other components along the tile production conveyor. The reclaimed wet tile material will be transported via another conveyor back to the mixing belt.

As an option, rather than producing "color-through" tiles, a colored pattern can be applied to the surface of the wet tiles to create a distinguished appearance, for specific types of tiles. Small batch mixers (one for each roofing tile line) are used to mix oxide pigment in the production building and the mixed pigment slurry is then applied to the surface of the wet tiles to create the colored patterns. The baghouse for each individual roofing tile line is used to capture dust emissions generated from each alternate color mixer. The pigment slurry will be applied to the wet tile surface by one of two different devices (i.e., spinning roller brush or spray nozzle) located in sequence in separate enclosures (i.e., alternate slurry applicator and antiquer) on the production line immediately following the tile trimmers.

The production line will then send the trimmed tiles to a racking machine, followed by a drying cycle inside one of ten identical curing enclosures. The curing area houses four identical lines of ten natural gas-fired curing enclosures. Each set of ten curing enclosures will be dedicated to the roofing tile line to which it is attached.

Eagle Roofing Products

Once removed from the curing enclosures, the tiles will be automatically returned to the racking machine, placed onto the production line and conveyed through an enclosure mounted on the line for application of a water-based sealer. Sealer is applied through one liquid spray nozzle to the tile surface as it passes through the enclosure. The sealer is used to coat the top surface of the roofing tiles to enhance appearance and protect the tile from premature weathering.

The tiles will then be automatically separated from the molds and placed on pallets for final packaging and shipping. The molds will then be returned back to the mold release oil application enclosure. The finished tiles will be packaged for storage and distribution using an automatic packaging machine.

Particulate matter (PM) will be emitted from the roofing tile ingredients handling, mixing, and conveying. The PM emissions will be controlled by the proposed baghouses.

VOC emissions will result from the application of the mold releasing oils and tile sealers. VOC emissions will be controlled with low VOC content releasing oils and water-based sealers.

Products of combustion will be emitted from the combustion of a natural gas in the tile curing enclosures. NOx emissions from the combustion of natural gas will be controlled with the use of a low NOx burner system.

Operating schedule: 24 hr/day, 365 day/year

III. Equipment Listing:

Processing Equipment List for ATC Permit N-5998-6-0		
Equipment Description	Quantity	HP Rating
30'L x 14"Dia. and 25'L x 14"Dia. Cement Silo Screw Conveyors served by two 25.0 hp motors (SC-13)	1	50.0
70'L x 24"W Sand Conveyor Belt served by a 15.0 hp motor (BC-12)	1	15.0
80'L x 24"W Shale Conveyor Belt served by a 15.0 hp motor (BC-13)	1	15.0
55 ton Sand Surge Hopper	1	0
5' & 1"L x 18"W Sand Metering Belt served by a 2.0 hp motor (BF-6)	1	2.0
55 ton Shale Surge Hopper	1	0
5' & 1"L x 18"W Shale Metering Belt served by a 2.0 hp motor (BF-10)	1	2.0
60 ton Cement Surge Hopper	1	0
10'L x 10" Dia. Cement Screw Conveyor served by a 3.0 hp motor (SC-4)	1	3.0
4' & 9"L x 18"W Cement Metering Belt Conveyor served by a 2.0 hp motor (BF-14)	1	2.0
169'L x 36"W Production Line Raw Material Belt Conveyor served by a 5.0 hp motor (Line 16)	1	5.0
Premixers with a Beater served by a 3.0 hp motor	4	12.0
27' & 9"L x 30"W Mixing Belt Conveyor served by a 7.5 hp motor	2	15.0
Mixing Belt Beater served by a 3.0 hp motor	18	54.0

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Mold Release Oil Applicator with Enclosure, Overspray Trough, & Recycle Tank	1	0
Tile Forming Equipment	1	0
Alternate Color Slurry Mixer (Slurry Pot) served by a 7.5 hp motor	1	7.5
Alternate Color Slurry Applicator – Slurry Station	1	0
Alternate Color Slurry Applicator – Antiquer Station	1	0
Curing Enclosure Loading/Unloading Equipment	1	0
10 Curing Enclosures served by a 950,000 Btu/hr natural gas fired low NOx burner (exempt from permits)	1	0
Sealer Application Station	1	0
Depallater and Packaging System	1	0
Baghouse Exhaust Blower served by a 20.0 hp motor	1	20.0
Total		202.5

Control Equipment for ATC Permit N-5998-6-0	
AP Engineering Model CS 49-10 Baghouse	
Quantity	1
Type	Pulse Jet
Total Cloth Area	578 ft ²
Air Flow Rate	3,500 dscfm
Blower Motor Power Rating	20 hp

IV. EMISSION CONTROL TECHNOLOGY EVALUATION:

A. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. BACT is required for the following actions: (1) Any new emissions unit with a potential to emit (PE) exceeding two pounds in any one day, (2) The relocation of an existing emissions unit from one stationary source to another with a potential to emit exceeding two pounds in any one day, and (3) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding two pounds in any one day. If the post project Stationary Source Potential to Emit (SSPE2) for Carbon Monoxide is less than 200,000 pounds per year, BACT is not required for Carbon Monoxide.

Pollutant	Daily PE (lb/day)	BACT Triggered?
NOx (Natural Gas Combustion)	0.3	No
CO (Natural Gas Combustion)	1.9	No
VOC (Natural Gas Combustion)	0.1	No
PM ₁₀ (Natural Gas Combustion)	0.2	No
SOx (Natural Gas Combustion)	0.07	No
PM ₁₀ (Tile Materials Handling & Processing)	0.6	No
VOC (Tile Surface Sealer Application)	1.4	No
VOC (Mold Releasing Oil Application)	3.1 ⁽¹⁾	Yes

¹ This value is based on the worst case of only utilizing the Eagle #3 mold oil (naphthenic distillate compound with a VOC content of 0.07 lb VOC/gal – less water & exempt compounds) for the manufacturing of “trim” roof tiles.

As shown in the table above, the applicant is proposing a new emissions unit, which will result in a daily potential to emit of greater than 2.0 pounds per day only for VOC emissions from the application of the mold releasing oil. Therefore, BACT is only triggered for VOC emissions from the proposed application of the mold releasing oil.

B. BACT Policy

Per District Policy APR 1305, Section IX, "A top-down BACT analysis shall be performed as a part of the Application Review for each application subject to the BACT requirements pursuant to the District's NSR Rule." For source categories or classes covered in the BACT Clearinghouse, relevant information under each of the steps may be simply cited from the Clearinghouse without further analysis.

The District's current BACT Guideline 6.2.5 is for a concrete roof tile surface coating operation utilizing a continuous fed booth. However, the emissions unit for this BACT analysis involves the application of the mold release oil onto the concrete roof tile metal molds used to prevent the concrete roof tiles from sticking to the metal molds during the manufacturing process. No BACT determination exists for this class and category of operation in the District's current 2004 BACT Clearinghouse. Therefore, pursuant to the District's BACT policy, a Top-Down BACT analysis will be performed for inclusion of a new determination in the District's BACT Clearinghouse.

C. BACT Analysis for Permit Unit N-5998-6-0 for VOC Emissions:

Step 1 - Identify All Possible Control Technologies.

The U.S. Environmental Protection Agency (USEPA) RACT/BACT/LAER Clearinghouse, the California Air Pollution Control Officers Association (CAPCOA) BACT Clearinghouse, the South Coast Air Quality Management District (SCAQMD), and the Bay Area Air Quality Management District (BAAQMD) BACT Guidelines were reviewed to determine potential control technologies for this class and category of operation, but no applicable guidelines were found. The most commonly utilized control methods for controlling fugitive VOC emissions from coating and miscellaneous manufacturing/processing operations is the use of a VOC capture and control system vented to a thermal/catalytic incinerator or carbon adsorption system and the use of low VOC content coatings/materials (Ref. District BACT guidelines in Sections 4.5, 4.11, and 6.2.5). No other type of VOC control method would have practical application to this process.

- (1). VOC capture and incineration (thermal & catalytic) with an overall control efficiency of 98%. (Ref. District BACT Guideline Sections 4.5, 4.11, & 6.2.5).
- (2). VOC capture and carbon adsorption with an overall control efficiency of 95%. (Ref. District BACT Guideline Sections 4.5, 4.6, & 6.2.5).
- (3). Use of mold releasing oils with a VOC content not exceeding 0.08 lb VOC/gal (less water and exempt compounds) and spray application enclosure with an overspray trough and recycle tank. (Ref. Proposed by the applicant and industry average as determined in Step 3 below.)

Step 2 - Eliminate Technologically Infeasible Options

All control options listed in step 1 are technologically feasible.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

For the proposed operation and type of industry, the industry standard (typical) mold release agent VOC content will be based on the VOC content from six concrete roof tile manufacturing facilities, which utilize a mold release oil on their concrete roof tiles obtained from the Roof Tile Institute. Each of the referenced facilities utilize a conveyerized concrete roof tile manufacturing line with a mold release oil application enclosure.

Typical Concrete Roof Tile Releasing oils	
Manufacturing Facility Name	As-Applied VOC Content (lb VOC/gal – less water & exempt compounds)
Eagle Roofing Products Co. (Rialto, CA)	0.07
Entegra Sales, Inc. (Stuart, FL)	0.08
Monierlifetile, LLC (N-479 / Lathrop, CA)	0.08
Monierlifetile, LLC (N-556 / French Camp, CA)	0.08
Monierlifetile, LLC (Irvine, CA)	0.08
Westile (Casa Grande, AZ)	0.09
Industry Average VOC Content	0.08

Based on experimental testing by the applicant and Monierlifetile, LLC (another roofing tile manufacturer), there are currently no lower VOC content releasing agents available to meet the requirements for the concrete roof trim tiles. According to Sandra Glenn of Monierlifetile, LLC, they have tested several different mold releasing oils from diesel oil to cottonseed/soybean oils and other different blends of petroleum based oils, which have a VOC contents of 0.24 lb/gal to 0.76 lb/gal. Currently the lowest VOC content tile releasing oil is a waste vegetable oil blend (bio-diesel) with a VOC content of 0.08 lb/gal. The above referenced facilities have been using the bio-diesel releasing oils for the last few years along with an application enclosure, overspray trough, and recycle tank. The tile releasing oil with a VOC content of 0.08 lb/gal (bio-diesel) is the lowest VOC content and most commonly used. Therefore, the bio-diesel releasing oil applied with an enclosure, overspray trough and recycle tank will be considered to be the "Industry Standard" and "Achieved in Practice" VOC control method for this class and category of source.

The control of fugitive VOCs involves the capturing of the gaseous emissions and the destruction of the collected gas with a control device. The collection efficiency of VOC laden air varies greatly among facilities depending on the equipment, operation parameters, and physical layout of the facilities. However, for a conservative estimate the collection efficiency will be assumed to be 100%. A typical thermal or catalytic incinerator can achieve 98-99%⁽²⁾ destruction efficiency, but many manufacturers will only guarantee 95%. To be conservative, the following calculations will be based on 98% control possible. A typical carbon adsorption system can achieve at least 95%⁽³⁾ VOC removal efficiency.

For control options #1 and #2, none of the six concrete roof tile manufacturing facilities surveyed above used a VOC capture and incineration system or a VOC capture and carbon adsorption system. Therefore, the control technology identified in options #1 & #2 will only be considered as technologically feasible at this time.

Ranking of VOC Control Technologies		
Control Method	Control Efficiency (%)	Achieved in Practice
1. VOC Capture and Control System with Incineration (Thermal & Catalytic) or Equivalent Control Equipment.	98.0	No
2. VOC Capture and Control System with a Carbon Adsorption System or Equivalent Control Equipment.	95.0	No
3. Use of mold releasing agents with a VOC content not exceeding 0.08 lb/gal (less water & exempt compounds) and spray application enclosure with an overspray trough and recycle tank.	0	Yes

Step 4 - Cost Effectiveness Analysis

The District's BACT Policy establishes annual cost thresholds for imposed control based upon the amount of pollutants abated by the controls. If the cost of control is at or below the threshold, the control is considered cost effective. If the cost exceeds the threshold, it is not cost effective and the control is not required. The cost effective threshold for VOC is \$5,000/ton.

² From page 144 of Estimating Costs of Air Pollution Control by William Vatauvuk and based on other District BACT guidelines for controlling VOC emissions with a thermal/catalytic oxidizer (District BACT Guidelines 4.2, 4.3, 4.4, & 4.9).

³ From page 170 of Estimating Costs of Air Pollution Control by William Vatauvuk and based on other District BACT guidelines for controlling VOC emissions with a carbon adsorption system (District BACT Guidelines 4.2, 4.3, 4.4, 4.5, & 4.9).

1st Most Effective Control Option:

VOC capture and incineration (thermal & catalytic) with an overall control efficiency of 98%.

(A). Emission Reduction:

The applicant is proposing to utilize the above determined industry standard control method with a daily VOC emission limit of 3.1 pounds. Based on operating at a worst case of 365 days/year and assuming a VOC capture efficiency of 100% and incinerator destruction efficiency of 98%, the amount of VOC emissions reduced is calculated below.

$$\begin{aligned} \text{Emission Reduction} &= 3.1 \text{ lb/day} \times 365 \text{ day/year} \times 1 \text{ tons}/2,000 \text{ lb} \times 0.98 \\ &= 0.55 \text{ ton/year} \end{aligned}$$

(B). Cost of a VOC Capture and Incineration (Thermal & Catalytic) System:

It will be determined if that the cost of the natural gas alone will be adequate to cause this technology to be not cost effective per District BACT policy. If the partial-cost analysis shows this option to be cost effective, then a more detailed analysis would be performed and include the capital cost of purchasing the afterburner or any additional operational and maintenance costs. The increase in temperature of the contaminated air stream required by a catalytic incineration system is less than for a thermal incineration.

Therefore, by demonstrating that the cost of the natural gas required by a catalytic incinerator would cause such a system to not be cost effective will also be sufficient to show that a thermal oxidation system would not be cost effective either.

For the tile coating operation, to achieve a capture efficiency of 100%, the operation will need to be conducted inside an enclosed booth or building. According to the information provided by the applicant, a majority of the VOC emissions from the mold releasing oil occurs during the curing of the tiles in the curing enclosure. Therefore, the most effective method to capture the emissions will be from the curing enclosure, which utilizes a 1,200 cfm exhaust blower to evacuate the enclosure at the end of the curing period. Therefore, as a conservative estimate an air flow rate of 1,200 cfm will be used to as the required flow rate through the catalytic incinerator.

$$\text{Natural Gas Requirement} = (\text{Flow})(C_{p\text{Air}})(\Delta T)(\text{HEF})$$

Where: Flow = air flow through the incinerator (1,200 cfm, as determined above)
C_{pAir} = specific heat of air (is 0.194 Btu/scf - °F)
ΔT = increase in the temperature of the contaminated air stream required for the catalytic incineration to occur (It will be assumed that the air stream would increase in temperature from 140°F⁴ to 600°F.)
HEF = heat exchanger factor (0.7 per the BACT analysis for Project #970715, Permit N-3650-1-1)

⁴ The applicants proposed maximum inside temperature of the curing enclosures.

Eagle Roofing Products

$$\begin{aligned}\text{Natural Gas Requirement} &= (1,200 \text{ scf/min})(0.194 \text{ Btu/scf} \cdot ^\circ\text{F})(\text{MMBtu}/10^6 \text{ Btu}) \\ &\quad \times (600 ^\circ\text{F} - 140 ^\circ\text{F})(0.7) \\ &= 0.075 \text{ MMBtu/min}\end{aligned}$$

The fuel usage will be reduced by the heating value of the influent VOC stream. The heating value of the VOC's being controlled is not known, so the heating value of MEK (13,729 Btu/lb) will be utilized in the calculation. The total annual quantity of VOC entering the control device will be based on a maximum of emitting 3.1 lb VOC/day \times 365 days/year = 1,132 lb-VOC/year

$$\text{VOC Stream Btu content} = (1,132 \text{ lb-VOC/yr})(13,729 \text{ Btu/lb}) = 15.5 \text{ MMBtu/yr}$$

In order to calculate the annual cost of natural gas the following assumptions will be made:

$$\begin{aligned}\text{Normal Operating hours} &= 24 \text{ hr/day and } 365 \text{ days/yr } (8,760 \text{ hrs/yr}) \\ \text{Cost of Gas} &= \$7.28/\text{MMBtu}^{(5)}\end{aligned}$$

$$\begin{aligned}\text{Adjusted Natural Gas Requirement} &= (0.075 \text{ MMBtu/min})(60 \text{ min/hr})(8,760 \text{ hr/yr}) \\ &\quad - 15.5 \text{ MMBtu/yr} \\ &= 39,405 \text{ MMBtu/yr}\end{aligned}$$

$$\text{Gas Cost} = (39,405 \text{ MMBtu/yr})(\$7.28/\text{MMBtu}) = \$286,868/\text{yr}$$

(C). Incinerator Cost Effectiveness:

$$\begin{aligned}\text{Cost effectiveness} &= \$286,868/\text{year} \div 0.55 \text{ ton-VOC/year} \\ &= \$521,578/\text{ton}\end{aligned}$$

The cost of VOC reduction utilizing capture and thermal/catalytic incineration would be greater than the \$5,000/ton cost effectiveness threshold of the District's BACT policy. The equipment is therefore not cost effective and is being removed from consideration at this time.

2nd Most Effective Control Option:

VOC capture and carbon adsorption with an overall control efficiency of 95%.

(A). Emission Reduction:

The applicant has proposed a daily VOC emission limit of 3.1 pounds. Based on operating at a worst case of 365 days/year and assuming a VOC capture efficiency of 100% and incinerator destruction efficiency of 95%, the amount of VOC emissions reduced is calculated below.

⁵ The natural gas price used is based on the average of the California industrial natural gas price over the last 12 months (June 2003 through May 2004) as published by the U.S. Energy Information Administration in their latest monthly natural gas report. See <http://tonto.eia.doe.gov/dnav/ng/hist/n3035ca3m.htm>

Eagle Roofing Products

$$\begin{aligned}\text{Emission Reduction} &= 3.1 \text{ lb/day} \times 365 \text{ day/year} \times 1 \text{ tons}/2,000 \text{ lb} \times 0.95 \\ &= \mathbf{0.54 \text{ ton/year}}\end{aligned}$$

(B). Cost of a VOC Capture and Carbon Adsorption:

Carbon adsorption occurs when air containing VOCs is blown through a carbon canister and the VOCs are adsorbed onto the surface of the cracks in the activated carbon particles.

Two main areas of cost are the cost of the carbon adsorption system itself and the operating cost of the carbon adsorption system. Therefore, it will be determined if the cost of removal and replacement of the carbon canisters alone will be adequate to cause this technology to be not cost effective per District BACT policy. If the partial-cost analysis shows this option to be cost effective, then a more detailed analysis would be performed and include the capital cost of purchasing the carbon adsorption system or any additional operational and maintenance costs.

The following cost for a carbon adsorption system will only include the cost of the service to remove and replace the saturated carbon canisters. According to a quote from Cameron Environmental⁽⁶⁾ the cost for removal of 60 lb of VOC from the carbon is \$170 or $\$170 \div 60 \text{ lb VOC} = \$2.83/\text{lb VOC removed}$. Therefore, the annual service cost can be calculated as follows:

$$\begin{aligned}\text{Service Cost} &= \text{Annual Emissions (lb VOC/yr)} \times \text{Removal Cost (\$/lb VOC)} \\ &= 1,132 \text{ lb VOC/yr}^{(7)} \times \$170 / 60 \text{ lb VOC} \\ &= \mathbf{\$3,207/\text{year}}\end{aligned}$$

(C). Incinerator Cost Effectiveness:

$$\begin{aligned}\text{Cost effectiveness} &= \$3,207/\text{year} + 0.54 \text{ ton-VOC/year} \\ &= \mathbf{\$5,939/\text{ton}}\end{aligned}$$

The cost of VOC reduction utilizing carbon adsorption would be greater than the \$5,000/ton cost effectiveness threshold of the District's BACT policy. The equipment is therefore not cost effective and is being removed from consideration at this time.

⁶ Cost estimate from Cameron Environmental performed on 12/29/03 for project #N-1030050. Since the cost estimate was performed less than 12 months ago, the capital installation cost estimate may be used for this project (Ref. District Policy APR 1305, section IX.D.4, 11/09/99).

⁷ Annual VOC emissions are based on a daily PE of 3.1 lb-VOC/day and operating a maximum of 365 days/year or $3.1 \text{ lb/day} \times 365 \text{ days/year} = 1,132 \text{ lb-VOC/year}$

3rd Most Effective Control Option:

Use of mold releasing oils with a VOC content not exceeding 0.08 lb VOC/gal (less water and exempt compounds) and spray application enclosure with an overspray trough and recycle tank.

The applicant is proposing this option; therefore, a cost effectiveness analysis is not required.

Step 5 - Select BACT

The most effective VOC control technology not eliminated in steps 2 and 4 above is the use of mold releasing oils with a VOC content not exceeding 0.08 lb VOC/gal (less water and exempt compounds) and spray application enclosure with an overspray trough and recycle tank. Since the applicant is proposing to utilize this control technology, the applicant is meeting BACT required for this class and category of source. In addition, permit conditions will be included on the Authority to Construct permits to enforce the BACT requirements.

**San Joaquin Valley
Unified Air Pollution Control District**

Best Available Control Technology (BACT) Guideline 6.2.X*

Last Update: January 25, 2004

Emission Unit: Concrete Roofing Trim Tile Mold Releasing Oil Application Operation

Pollutant	Achieved in Practice or contained in SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Use of mold releasing oils with a VOC content not exceeding 0.08 lb VOC/gal (less water and exempt compounds) and spray application enclosure with an overspray trough and recycle tank.	1. VOC capture and control with incineration (98% overall control efficiency). 2. VOC capture and control with carbon adsorption (95% overall control efficiency).	

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source - Permit Specific BACT Determinations on Next Page(s)**

6.2.X.

1st Quarter 2005

**San Joaquin Valley
Unified Air Pollution Control District**

Best Available Control Technology (BACT) Guideline 6.2.X.A

Emission Unit: Concrete Roofing Trim Tile
Mold Releasing Oil Application
Operation

Equipment Rating: 4,200 Tiles/hr

References: N-5998-6-0
Project #: 1042616

Facility: Eagle Roofing Products

Date of Determination: TBD

Location: 4555 S. McKinley Avenue
Stockton, CA

Pollutant	BACT Requirements
VOC	Use of a mold releasing oil with a VOC content of 0.08 lb-VOC/gal (less water and exempt compounds) or less and spray application enclosure with an overspray trough and recycle tank.

- BACT Status:**
- Achieved in practice Small Emitter T-BACT
 - Technologically feasible BACT
 - At the time of this determination achieved in practice BACT was equivalent to technologically feasible BACT
 - Contained in EPA approved SIP
 - The following technologically feasible options were not cost effective:
VOC Capture and Incineration.
VOC Capture and Carbon Adsorption.
 - Alternate Basic Equipment
 - The following alternate basic equipment was not technologically feasible:

Mail to: CAPCOA BACT Clearinghouse Project Assessment Branch PO Box 2815 Sacramento, CA 95812	For CAPCOA use only Record No.: _____; Form No.: _____; BLIS District Code: _____ Codes - EPA Source: _____; SCAQMD: _____; EPA ID No.: _____ ARB Sc: _____, Ctrl: _____; BLIS Process: _____; AIRS Facility No.: _____
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CAPCOA BACT DETERMINATION REPORTING FORM

Instructions: Complete this form when issuing an authority to construct. Please use one form per determination (i.e. pollutant). Please use one form per determination (i.e. pollutant) Section A need only be completed on one form in the case of a source with multiple determinations. See the reverse side for descriptions of the field identifiers used below. Please attach a copy of the permit or permit conditions if practical. Please call (916)327-5601 for clarification of any questions. (1/5/94)

SECTION A. Source Information

Company and Project Name: Eagle Roofing Products

Facility Address: 4555 S. McKinley Avenue; Stockton, CA;

SIC Code: 3272

Application No.: N-1042616; Authority to Construct No.: N-5998-6-0;

Authority to Construct Issue Date: _____

District: SJVAPCD; District Contact: David Warner; Phone No.: (559) 230-6000

Est. Startup Date: _____; Today's Date: 1/6/05; Permit Unit Status: New

Basic Equip./Process (include make and model): Concrete Roofing Tile Manufacturing Line #16 consisting of a mold release applicator; sand, shale, & cement surge bins; metering conveyors; 4 remixers; mixing conveyors; tile extruder; tile trimmer; color slurry applicators, antiquer color slurry applicators, ten curing enclosures served by a 0.95 MMBtu/hr natural gas fired low NOx burners; sealer application booth; deaplater, and packaging system.

Rated Capacity: Input: _____; Output: 4,200 Tiles/hr; SCC Code: _____

Fuel Type: N/A; Backup Fuel(s): N/A; Project Cost: \$ _____

SECTION B. Control Data Pollutant: VOC (one pollutant per form)

Control Equip. (include make and model): Mold release application enclosure with an overspray trough and recycle tank.

Emissions: Uncontrolled: 3.1 lbm/day Controlled Limit: 3.1 lbm/day

Enforceable Permit Emissions Limit(s): The VOC emissions limit from the use of the mold releasing agent shall not exceed 3.1 lb/day.

Emission Type: point; Cost of Control Equipment: N/A

Regulatory Requirement: District-Defined BACT Other: NSR Limit

BACT/LAER Specification: Reference or Basis:

Mass Emission Rate: 3.1 lb/day; Destruction efficiency (%): N/A

Normalized Mass Emis. Rate: N/A lbm/MMBtu; N/A g/bhp-hr; N/A lbm per ton input/output

Emission Concentration N/A ppmvd at _____

Other: N/A

Method of Compliance Verification: Record Keeping

Other Relevant Permit Limits: Time of Operation: 24 hours/day and 365 days/year

Fuel use: N/A; Percent Capacity/Use: 100%

Throughput: 100,800 tiles manufactured per day

Other: N/A

Remarks: _____

Stubbs, Danny

From: Carl Riddlemoser [CRiddlemoser@kleinfelder.com]
Sent: Monday, November 13, 2006 4:09 PM
To: Victor Torcat; Stubbs, Danny
Subject: Eagle point testing in building

Thank you for your earlier question.

Eagle Roofing would prefer to test the building instead of each drop point and bag house. I will be out of the office tomorrow. If you have any additional questions the fastest way to contact me will be by my dcell phone (813) 777-7825.

KLEINFELDER
EXPECT MORE

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.

Stubbs, Danny

From: Carl Riddlemoser [CRiddlemoser@kleinfelder.com]
Sent: Friday, November 10, 2006 3:06 PM
To: Victor Torcat; Stubbs, Danny
Subject: Eagle Roofing

Good morning.

Pursuant to our conversation Thursday 11/9 the following is offered to clarify the items we discussed.

Comment 1: There are two bag houses on each cement silo. The flow listed in the permit is 2685 scfm. Is this a total airflow or is it per bag house?

Response: The flow is per bag house. There are two pneumatic loaders on each silo. If both loaders were in use the flow would be 5370 scfm. However, by practice Eagle Roofing only uses one loader at a time so 2685 scfm in practice is a total air flow. Eagle Roofing is willing to accept a permit restriction allowing the use of one loader per bag house at any time.

Comment 2: The application and manufacturers literature lists the maximum loading rate for the cement silos as 22.5 tons/hour. Can the silos be tested at 25 tons per hour?

Response: Yes

Comment 3: The sand and shale receiving and handling area will need to be tested at 384 tons per hour the maximum throughput rate stated in the application.

Response: Yes

Comment 4: Each drop point will need to be tested on emission unit 1. Please further describe the drop points. Specific information is needed to identify the 10 drop points listed in the application.

Response: Four of the drop points are within the grizzly where trucks drop material onto BC-1, BC-2, BC-3 and BC-4 where then each belt drops on to BC-5. Point five is where BC-28 from the reject tile recycle area drops onto BC-5. Point six is the transfer tower structure where BC-5 drops to BC-6. Point seven is the tower screen structure where BC-6 drops to BC-7. Point 8 is the transfer into the 200 ton bin structure. Points nine and ten are the transfer from the 200 ton bin structure onto BC-9 and BC-10. However due to the proximity of BC-9 to BC-10 (two to three feet) these can possibly be considered as a single drop point.

Comment 5: The sand and shale emission unit 1 loading rate will need to be measured. What method will be used?

Response: Each truck delivered will have a weight ticket or transport manifest. Eagle Roofing will verify the weight ticket or transport manifest are based upon truck scale data. If this data is not available Eagle Roofing will up set up scales to gather loaded and tare weights to verify the loading rate.

Comment 6: Is emission unit 4 exempt sub part 000 by design because it

is vented into the building.

Response: No. It is vented into the building to better monitor the bag house operation. If there were a bag house failure it would be discovered more quickly and lost material could be recovered more easily.

Comment 7: Is the pigment sub area exempt sub part 000 by design because it is vented into the building.

Response: No. It is vented into the building to better monitor the bag house operation. If there were a bag house failure it would be discovered more quickly and lost material could be recovered more easily. Additionally subpart 000 does not apply to the pigment mixing area.

Comment 8: An emission limit was not requested for the tile production area.

Response: Emission limits were not requested for any of the emission units. Eagle Roofing requests the maximum possible emission limit assigned for each unit.

Comment 9: Is there a tile crusher at the reject tile recycle loading hopper at conveyor BC-21? The description in the process description Attachment 2 page 5 describes rotating metal spike shafts breaking the tiles.

Response: Yes. There are two horizontal shafts which pulse and spin slowly. The shaft rotation rate is only a few revolutions per minute. The purpose is to break the larger tiles into 4 inch to 6 inch pieces for the jaw crusher. Material is loaded into the hopper to a level which covers the shafts while in operation.

Comment 10: The reject tile recycle area emission unit 8 will need to be tested at 30 tons per hour the maximum throughput rate stated in the application.

Response: Yes. However, testing for this unit may need to be completed after testing for the emission units 1 through 7 to allow sufficient material accumulation for the test.

Comment 11: Please further explain the fine material loading hopper on the reject tile recycle area emission unit 8.

Response: It is used for material generated during house keeping and maintenance operations. This is for incidental materials generated when hatch covers are opened and floor sweepings.

Comment 12: Is it the design intent of emission unit 8 to test only the bag house?

Response: No. We will need to test each drop point for opacity.

Thank you.
KLEINFELDER
EXPECT MORE

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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date: 11/09/2006		Subject: Permit Application Questions	
Time: Approximately 10:00 AM		Permit No. 1190045-001-AC	
		County: Sumter	
Mr. Carl Riddlemoser (Kleinfelder)		Telephone No.:813 887-3900	
Representing: Eagle Roofing			
<input checked="" type="checkbox"/> Telephoned Me	<input type="checkbox"/> Was Called	<input type="checkbox"/> Scheduled Mtg.	<input type="checkbox"/> Unscheduled Mtg.
Other Individuals Involved in Conversation/Meeting:			
<p>Summary of Conversation/Meeting: Carl returned my phone call from 11/08/2006 regarding permit application questions. The primary item of discussion was related to the design and operation of the equipment located in the aggregate mix building. This equipment could potentially be exempt from permitting because information in the application describes a system that captures all fugitive emissions and then discharges then inside. Carl will call back to further discuss this issue.</p>			
		Signature:	
		Title:	

Stubbs, Danny

From: Nasca, Mara
Sent: Monday, October 23, 2006 6:34 PM
To: Zhang-Torres; Stubbs, Danny
Subject: FW: Please add me as a 3rd party in the Eagle Roofing Company Permit Application.

From: Sandra Glenn [mailto:SGlenn@Monierlifetile.com]
Sent: Monday, October 23, 2006 11:11 AM
To: Nasca, Mara
Subject: Please add me as a 3rd party in the Eagle Roofing Company Permit Application.

Sincerely,

Sandra

Sandra L. Glenn, PE.
MonierLifetile LLC
POB 537
Decatur, GA 30031
C: 949-981-3319
F: 949-585-8964

Stubbs, Danny

From: Nasca, Mara

Sent: Thursday, October 19, 2006 3:30 PM

To: Stubbs, Danny

Cc: Zhang-Torres

Please add Sandra Glenn as a third party to the Eagle Roofing permit 1190045-001-AC

Mara Grace Nasca
District Air Program Administrator
Department of Environmental Protection
Division of Air Resource Management
Southwest District
(813) 632-7600, Ext. 124
Suncom 514-9155, Ext. 124
Fax (813) 632-7668

10/19/2006

Eagle Roofing Products Florida LLC FDEP Plant Tour October 16, 2006

Covered Drive Over Sand Delivery System, no loose piles or dusty front-end loader.

All conveyors are covered, eliminating dust on windy days.

200 ton bin completely enclosed.

Cement Silos and screws completely enclosed with double bag houses.

Scrap tile recycle system with covered conveyors and dust collectors recycles 100% of scrap tile for reuse as aggregate.

Bulk liquid storage tanks completely enclosed with spill containment wall. Bulk deliveries eliminate hundreds of 55-gallon drums.

Surge hopper area completely enclosed and dust collected at all metering and drop points including pre mixers and main mixer drop points.

Color Mixing Tanks completely enclosed and dust collected.

Alar water recycling system cleans 100% of plant water for reuse in manufacturing process. Solids are dried and recycled into base of slurry tiles.

Mold oil application booth and recirculation reservoir completely enclosed.

Sealer application booth and recirculation reservoir completely enclosed.

Slurry mix tank with pneumatic cement metering system, which eliminates dusty cement sacks, is enclosed and dust collected.

Wet mix recycle belts instantly reuse fresh concrete and eliminate landfill use.

Well-insulated curing chambers with high efficiency, low NOX propane burners maximize energy use.

Self-contained pressure washing island clean equipment filters and reuse water.

6S-training program and weekly manufacturing bonus ensure that safety and housekeeping are at the forefront of all team members actions and rooted in Eagle company culture.

*This document was
provided by Eagle Roofing
at the time of a site visit
D. STUBBS
10/16/06*



KLEINFELDER

An employee owned company

**Dept. of Environmental
Protection**

OCT 13 2006

Southwest District

October 6, 2006
File No. C56-2046-01

Cindy Zhang-Torres, PE II
DEP Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637
Phone: 813-632-7600

**SUBJECT: Eagle Roofing Air Permit Application, 1575 E County Road
470 Sumterville, Florida,**

Dear Ms. Zhang-Torres:

Enclosed please find four copies of the revised PM calculations to accompany the previously submitted application.

The engineering information in this document was prepared by and/or under the direct supervision of a Florida licensed Professional Engineer. The engineer certifies that the document conforms to currently-accepted engineering practices pursuant to Chapter 471 of the Florida Statutes.

Sincerely

KLEINFELDER, INC.

Eric Frohnapple, PE
Environmental Group Manager
Florida PE Registration number 54017



Facility Emissions Summary

Poll ID	Estimate Actual Emissions		Potential To Emit	
	lbs/hr	tons/yr	lbs/hr	tons/yr
Total PM	4	8.89	7	14.27
PM-10	2	4.38	3	7.34
VOC	1.01	4.41	1.01	4.41
SO2	0.01992	0.09	0.01992	0.09
NO2	0.34272	1.50	0.34272	1.50
CO	0.84	3.68	0.84	3.68

Unit 6 VOC emissions	
lb/hr	ton/yr
0.84	3.67

Sealer and oil VOC = Unit 6 emissions

(2.66 tons from oil VOC's Spreadsheet)

Sand/Shale, Cement/Fly Ash and Pigment Material Quantifications

Tile Manufacturing Data

- 150 Maximum line speed production rate (tiles/minute)
- 4 production lines
- 24 Maximum operating time (hrs/day)
- 365 Maximum operating time (day/yr)
- 10 lbs/tile
- 25% Percent Wt. as Cement/Fly Ash
- 75% Percent Wt. as Sand/shale
- 0.005 pound pigment per pound tile
- 5% Maximum percent of anticipated reject tiles (typical range is 1 to 3%)

Cement Silo Filling Data

- 20 minutes per cement delivery
- 26 tons cement per delivery
- 0.77 minutes cement silo baghouse operation per ton cement
- 1.54 minutes cement silo baghouse operation per ton cement for 2 Silos with baghouses

The following calculated values were derived based on the maximum potential operations which are limited to the maximum tile production line speed. This speed is based on the physical limits of the system.

Cement Material Quantification

- 1500 lbs cement/minute
- 90000 lbs cement/hr
- 45 tons cement/hr
- 394200 tons cement/yr

Sand Material Quantification (at Unit 4)

- 4500 lbs sand/minute
- 270000 lbs sand/hr
- 135 tons sand/hr
- 1182600 tons sand/yr

Sand Material Quantification (at Unit 1)

No more sand would be conveyed to the storage bins than is used in the process at max operation as calculated above

- 1182600 tons sand/yr

The Unit 1 conveying system will be capable of handling more sand on a short term basis than the production requires. Therefore, it will operate intermitantly as needed.

For Max hourly emissions, the max conveyor capacity was used.

- 384 tons sand/hr

Pigment Quantification

- 1800 lbs/hr
- 0.9 tons/hr
- 7884 tons/yr

Reject Tiles (Unit 8)

The tile recycling system will operate intermitantly when sufficient reject tile quantity is available to warrant running the crushers and screen.

Therefore, max hourly rate is based on the physical limits of the VSI crusher since it is the slowest operation in the system.

- 30 ton/hr maximum system capacity
- 78840 ton/yr (based on 5% maximum reject tile quantity)

Based on a high production month at a six line facility, Pigmetn use is estimated as follows:

April '04

47245

474760

278630

298430

52910

1,151,975 FeO2 total 6 lines per month

16.00 tons FeO2 per day

79350 TiO2 total 6 lines per month

1.10 tons FeO2 per day

1,231,325 total april 04 pigment use

41,044.17 total estimated sck pigment use per day (lbs) at 150 & 24 hr

20.52 total estimated sck pigment use per day (tons) at 150 & 24 hr

21 tons per day pigment - through color

Stubbs, Danny

From: Carl Riddlemoser [CRiddlemoser@kleinfelder.com]
Sent: Wednesday, October 11, 2006 10:02 AM
To: Stubbs, Danny
Cc: Kris Allen
Subject: Phone meeting this afternoon

When we spoke Monday you indicated availability from 1:30 to 5:30 this afternoon. If possible we would like to set up a phone conference for 3:30 EST. The meeting participants from Kleinfelder would be Kris Allen and myself. *

The information below is for my phone conference account

Primary Dial-In: 1 (800) 445-5315
Alternate Dial-In: 1 (847) 944-7279
Enter Passcode: 8961649#

CALL
KRIS

The meeting agenda
Address comments in the draft correspondence you forwarded Friday last week.

Our goal is to clear up as much as possible on the phone so you can continue your review and to receive guidance so we can properly structure our response.

>>> "Stubbs, Danny" <Danny.Stubbs@dep.state.fl.us> 10/11/2006 7:08 AM
>>>
Carl,

Got your message. I'm sending this email in response to your voicemail requesting my email address.

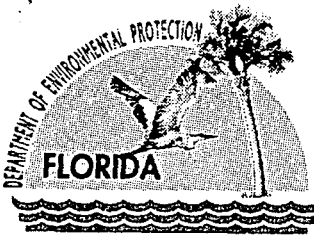
If you need anything else, let me know.

Danny Stubbs
Permit Engineer Specialist
FDEP Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
PHONE: 813-632-7600 Ext. 159
FAX: 813-632-7668

KLEINFELDER
EXPECT MORE

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Jeb Bush
Governor

Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: 813-632-7600

Colleen M. Castille
Secretary

October 6, 2006

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

Re: Application dated September 13, 2006
DEP File No. 1190045-001-AC

Dear Mr. Burlingame:

On September 15th, 2006, the Department received your application for an air construction permit. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Please include PM as a pollutant in the application. The application only accounts for PM10 at this time. On page 13 of DEP Form No. 62-210-900(3), the applicant is instructed to include each pollutant (listed in Appendix D of the instructions) the facility emits or has the potential to emit. Calculations used to estimate "Potential Emissions" should include control equipment and control efficiencies, as defined in rule 62-219.200.

"Potential to Emit" - The maximum capacity of an emission unit or facility to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the emissions unit or facility to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of an emission unit or facility.

Also, please review PM emissions calculations. It is unclear whether a capture efficiency or control efficiency was applied to the "Potential to Emit" calculation. For example, in the calculations for Emission Unit 1, the "Screening" emission calculation for sand includes the following line item information:

- Total Material = 1,112,760 tons/yr
- Uncontrolled Emission Factor = 8.7E-3 PM10/ton
- Capture Efficiency = 90%
- Control Efficiency = 99.9%

Page 1 of 3

"More Protection, Less Process"

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$$\begin{aligned} \text{Potential Emission} &= (1,112,760 \text{ tons/yr}) * (8.7\text{E-}3 \text{ PM}_{10}/\text{ton}) * (1-0.90) / 2000 \\ &= 0.48 \text{ tons/year} \end{aligned}$$

In this case, "Control Efficiency" is listed, but is never used. This is confusing and makes it difficult to evaluate the results. Please make it clear, which efficiency is applied in the "Potential to Emit" equation.

2. Please include more information relating to screening dust collector in "Emission Unit 001". A dust collect is mentioned on page 12 of the application; however, no further details are supplied.
3. Please verify the control efficiency for "Emission Unit 004". On page 37 of the application, the dust collector control efficiency is listed as 98%; however, in the emissions calculations included in Attachment 3, the efficiency is listed as 99.9%.
4. Please re-submit or explain the VOC calculations related to "Emission Unit 006". In "Attachment 3.2" of the application, page 6 contains an evaporation rate calculation. This evaporation rate should represent the evaporation of the VOC and thus, the vapor pressure of the VOC contained in E-46. In the calculation submitted, the vapor pressure of bio-diesel was used. Unfortunately, the vapor pressure of bio-diesel is orders of magnitude lower than any VOC that would likely be contained as a component in E-46. Therefore, it is not a valid assumption to use the vapor pressure of bio-diesel in the "Evaporation Rate Equation" calculation. Additionally, the molecular weight of the VOC should also be used in the "Evaporation Rate Equation", not the molecular weight of E-46.

There are many other potential problems that arise with attempting to use the evaporation rate model for this system. Please consider re-calculating VOC emissions based on usage. Below is a rough approximation of VOC's emitted based on usage information supplied in the application:

VOC from E-46 = 11.88 Tons/Year, and
VOC from Eagle Blend #3 = 1.35 Tons /Year.

The calculations above are based on: (a) 315,360,000 tiles / year (283,824,000 Field Tiles and 31,536,000 Trim Tiles); (b) 0.0093 lb/tile usage rate of E-46 and Eagle Blend #3; (c) 0.9% VOC content for E-46 (used on page 7 of "Attachment 3") and (d) 0.92% VOC content for Eagle Blend #3 (based on MSDS 8g/liter or 0.066667 lb/gal).

While the calculation above may not be absolutely correct, it is representative of the potential VOC emissions. It should be noted that the MSDS lists the volatiles at less than 2% for E-46. The calculation in the application stated 0.9% VOC content. If there is supporting documentation on E-46 to support 0.9% VOC content, it must be included. When a content range or maximum value is supplied, emissions potentials are always based on the highest value.

5. Please verify there are no significant PM emissions from "Emission Unit 006". There is a baghouse included in the "Attachment 4.2"; however, this baghouse is not included in the emission unit section. Additionally, there are no PM calculations for this emission unit. This suggests that there are

no significant PM emissions associated with the production lines. Please give a brief explanation if this is the case.

6. Please verify the volumetric flowrate of the recycle tile dust collector system. On page 68 of the application the volume flowrate is listed as 3500 dscfm. In "Attachment 4.5", the vendor data specifies 13,600 ACFM.
7. Please specify which "Emission Unit" Attachment 4.6 belongs to. It includes a dust collector and appears to be a part of "Emission Unit 008" of the application.

NOTE - Rule 62-4.050, F.A.C. requires applications of this type 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. Therefore, your response to the above requests should be certified by a professional engineer. Additionally, application fees may increase as pollutants quantities increase. Please review all affected emission unit and include additional application fees if required.

Your response should be submitted by January 4th, 2007. If you have any questions, please call me at 813-632-7600 extension 159.

Sincerely,



Danny Stubbs

cc:

Eric Frohnapple, PE
Kleinfelder
2011 North Capital Avenue
San Jose, CA 95131

Stubbs, Danny

From: Bradley, Christopher
Sent: Tuesday, September 19, 2006 10:36 AM
To: Stubbs, Danny; Galbraith, Bret
Cc: Zhang-Torres; Henry, Danielle D.; Nasca, Mara
Subject: RE: Eagle Roofing Products AC application 1190045

Danny: This facility is currently under enforcement for construction w/o a permit. OGC is spearheading a legal effort to halt construction. Please coordinate with Bret and inspection performed by the permitting staff.

Bret: Since you are most familiar w/ this activity please coordinate with Danny any inspection conducted by the permitting staff.

If you have any questions, please contact me or Danielle.

Chris

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

From: Zhang-Torres
Sent: Tuesday, September 19, 2006 8:50 AM
To: Bradley, Christopher
Cc: Nasca, Mara; Henry, Danielle D.
Subject: Eagle Roofing Products AC application 1190045

Company Name/Site: Eagle Roofing Products Florida LLC
Project Number: 1190045-001-AC
Receipt Date: 09/15/06
Response Due Date: 09/29/06
Existing Permit No.: None, new facility

Assigned Inspector: NA

Last Facility Inspection (ARMS): NA

Permit Engineer: Danny Stubbs

We have 4 copies of the application.

This is an application for a construction permit for roof tile manufacturing.

Please let the Permit Engineer know by the date above if you have any items to add to a potential incompleteness letter, or any other concerns you may have with this project OR IF YOU DO NOT HAVE ANY COMMENTS.

Cindy Zhang-Torres, PE III
Air Permitting Supervisor
FDEP
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813)632-7600, ext. 107

9/19/2006

Stubbs, Danny

From: Zhang-Torres
Sent: Tuesday, September 19, 2006 9:03 AM
To: Stubbs, Danny
Subject: FW: Eagle Roofing Products AC application 1190045

From: Zhang-Torres
Sent: Tuesday, September 19, 2006 8:50 AM
To: Bradley, Christopher
Cc: Nasca, Mara; Henry, Danielle D.
Subject: Eagle Roofing Products AC application 1190045

Company Name/Site: Eagle Roofing Products Florida LLC
Project Number: 1190045-001-AC
Receipt Date: 09/15/06
Response Due Date: 09/29/06
Existing Permit No.: None, new facility

Assigned Inspector: NA

Last Facility Inspection (ARMS): NA

Permit Engineer: Danny Subbs

We have 4 copies of the application.

This is an application for a construction permit for roof tile manufacturing.

Please let the Permit Engineer know by the date above if you have any items to add to a potential incompleteness letter, or any other concerns you may have with this project OR IF YOU DO NOT HAVE ANY COMMENTS.

Cindy Zhang-Torres, PE III
Air Permitting Supervisor
FDEP
Southwest District
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Telephone: (813)632-7600, ext. 107
Fax: (813)632-7668

9/19/2006



KLEINFELDER

An employee owned company

MEMORANDUM

TO: Cindy Zhang-Torres P.E.
FROM: Carl Riddlemoser
RE: Eagle Roofing Air Permit Application
DATE: September 15, 2006

Attached please find 4 copies of the Air Permit Application for Eagle Roofing's Sumterville facility. This is the Application previously forwarded as a CD copy along with a \$2,000 check for the application fee.

Dept. of Environmental
Protection
SEP 15 2006
Southwest District