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June 30, 2008

Ms. Nancy E. Knight
Air Permit Engineer Specialist
Florida Department of Environmental Protection (FDEP)
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Subject: **Response to Request for Additional Information**
Air Operation Permit
Permit Project No.: 1190045-002-AO
Eagle Roofing Products Florida, LLC

Dear Ms. Knight:

On behalf of Eagle Roofing Products Florida LLC, (Eagle Florida), Kleinfelder is providing this response to your May 22, 2008 letter request for information regarding the above-referenced air permit application. We have provided modified forms, calculations and additional supporting information in the attachments. The following details the information requested in the order presented in your letter. For convenience, we have provided the FDEP's request in ***bold italics***, followed by a response from Kleinfelder, on behalf of Eagle Florida:

1. ***General Facility Information***

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

Eagle Florida was required to use alternate aggregate (W-10) with sand due to unanticipated conditions at the site. W-10 aggregate was required in addition to sand because the local sands have a different gradation, which affects the tile making process. We request that shale remain in the permit for future manufacturing of light weight tiles along with the sand and W-10 aggregate. White cement was needed in addition to gray cement to address the Florida market demand for certain colored tiles.

There is no change in expected maximum emissions as a result of using these alternate materials.

The modified permit application forms for EU 001 through EU 004 provided in Attachment 1 reference W-10 aggregate and white cement (in addition to shale, gray cement and plaster sand).

(A) See back for page 2

2. ***Emission Unit Comment, Page 20***

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

The description of the silo was modified in the forms to include white cement (Attachment 1).

3. ***Emission Unit Comment, Page 37***

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

We have referenced three production lines in lieu of four production lines in the permit application, including the Emission Unit Information Form and Attachment 2: Emission Calculations.

Eagle anticipates constructing the fourth production line in the future and requests to extend the expiration of the current construction permit, 1190045-001-AC until December 31, 2011. The "Permit Processing Fees" section to follow includes a discussion of fees included with this submittal (construction permit extension, construction permit application for EU 005 modification, and operating permit refund).

4. ***Emission Unit Control Equipment, Page 47***

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

As you have recommended during your site visit, we request that the reject tile recycling crushing system (EU 005) and the crushed tile storage bin (EU 006) be combined as one emission unit (EU 005). Particulate emissions from both sources are conveyed to the same dust collector. A revised description of the system that details the dust collector specifications is provided on page 46 and 47. The figures included in Attachment 3 (construction permit application) provide a flow diagram, process layout, emission points that are controlled by the dust collection system and air flow rates.

primary control is wet product - but there are pick up points

For clarification, please note that EU 001 does not require a dust collection system as referenced in your comment. Emissions are minimal because the sand, shale and W-10 aggregate must be maintained at high moisture content (6 to 18%) for the manufacturing process. Particulate emissions from the conveying of the material to screening, storage and processing areas are further minimized by the use of enclosures that cover the conveyors and equipment.