

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 09-Feb-1999 09:06am
From: Ross Pollock TAL
POLLOCK_R
Dept: Air Resources Management
Tel No: 850/488-0114

To: Gary Robbins CLW (ROBBINS_G @ A1 @ EPIC66)

Subject: Angelo's Recycled Materials and John Carlo

Gary,

Thank you for your comments on the Angelo's Recycled Materials and John Carlo permits. Copies of the applications for all three permits were sent to you yesterday.

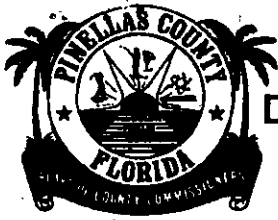
In response to your comments on the Angelo's permits. The diesel engines were not included as emission units because there are no regulations applicable to them. However facility wide conditions such as the limit on visible emission, will of course apply to the diesel engines. PM Ract requirements were not included in these permits because these are not currently existing sources. As you requested I intend to clarify specific conditions 23, 24, 25 in Section II as well as condition 8 in Section III so that it will be clear where these documents should be sent.

In regard to the John Carlo permit I will clarify the facility description where applicable. I also intend to add the condition for operation in Pinellas County.

If you have any more comments or questions please contact me.

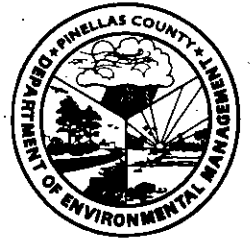
Thanks,

Ross Pollock



**PINELLAS COUNTY
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**AIR QUALITY DIVISION
300 SOUTH GARDEN AVENUE
CLEARWATER, FLORIDA 33756**



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FEB 08 1999

BUREAU OF
AIR REGULATION

February 4, 1999

Jonathan Holtom
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8318

Re: John Carlo, Inc., 7770210-001-AC

Mr. Holtom:

This office has "Intent to Issue" construction permit, for the above mentioned facility. Pinellas County is requesting a copy of the construction application. The following comments are provided:

1. Since we did not receive a copy of the construction permit, I assume from the facility description in Section I, that emissions from pneumatic loading of the silo, batching, and hopper are controlled by a central baghouse. Can the description be modified to clearly state what is vented to the baghouse. Such as: "This facility consists of a relocatable REX Central Mix concrete batching plant with a cement silo capacity of 600 barrels and a batcher with a maximum rate of 200 cubic yards of concrete per hour. Emissions from the silo, batcher and hopper are controlled by a C & W Manufacturing Company central baghouse system, Model Number CW-RA-140."

Note: The technical evaluation lists the baghouse model number as CW-RA-140 while the facility description of the permit list the model number as RA 140. The model number should be consistent throughout the permit.

2. Specific Condition No. 19. - Seems to indicate that the silo and batcher are controlled by separate baghouses while the facility description seems to indicate one central baghouse. If there is one separate baghouse the condition should change to restrict the operation to how they test (ex: simultaneous operation of silo loading, batching or only doing one operation at any given time).



3. Specific Condition No. 24. - The condition should be changed to read; "**Test Reports**. The owner or operator of an emissions unit for which a compliance test is required shall file a report with Department's district office and, if applicable, appropriate local program on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C.

4. The baghouse will require an O&M Plan for operation in Pinellas County. The condition could read:

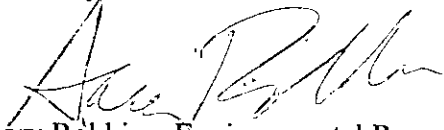
"An Operation and Maintenance (O&M) Plan, for the C & W Manufacturing Company central baghouse system, Model Number CW-RA-140 must be submitted to Pinellas County with the application for an operating permit. The O&M logs shall be maintained for a minimum of two years and made available upon request. At a minimum, the O&M plan shall include:

- A. The operating parameters of the control device.
- B. A timetable for the routine maintenance of the pollution control device.
- C. A time table of routine weekly, bi-monthly, or monthly observations of the pollution control device.
- D. A list of the type and quantity of the required spare parts which are stored on the premises for the control device.
- E. A record log which shows, at a minimum, when maintenance was performed, what maintenance was performed, and by whom.

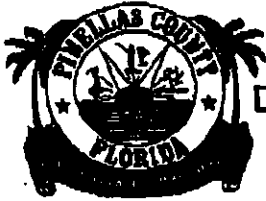
[Pinellas County Pinellas County Code, Section 58-128]

If you have any questions, contact this office at (727) 464-4422 or Suncom 570-4422.

Sincerely,


Gary Robbins, Environmental Program Manager
Air Quality Division

cc: PF(7770210 001), RF



PINELLAS COUNTY DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

AIR QUALITY DIVISION
300 SOUTH GARDEN AVENUE
CLEARWATER, FLORIDA 33758



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condition (d) removed.

one baghouse is used, but SC-19 is taken directly from 42-296.414(3)

do not change

3. Specific Condition No. 24. - The condition should be changed to read; "Test Reports". ✓
The owner or operator of an emissions unit for which a compliance test is required shall file a report with Department's district office and, if applicable, appropriate local program on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C.

4. The baghouse will require an O&M Plan for operation in Pinellas County. The condition ✓
could read:


"An Operation and Maintenance (O&M) Plan, for the C & W Manufacturing Company central baghouse system, Model Number CW-RA-140 must be submitted to Pinellas County with the application for an operating permit. ^{when operation in Pinellas Co.} The O&M logs shall be maintained for a minimum of two years and made available upon request. At a minimum, the O&M plan shall include:

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[Pinellas County Pinellas County Code, Section 58-128]

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Gary Robbins, Environmental Program Manager
Air Quality Division

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