KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
904/377-5822 ▪ FAX 377-7158

K&A 578-95-01

October 30, 1995

Mr. Eric Peterson
Air Permitting Engineer
FDEP-SWD, Air Program
3804 Coconut Palm Drive
Tampa, Florida 33619

SUBJECT: Dixie Lime and Stone Company
Sumterville Mine - Nonmetallic Mineral Processing Plant
Air Construction/Operation Permit Application
FDEP File Nos. AC60-275111, AO60-275112
Response to Request for Additional Information dated October 17, 1995

Dear Mr. Peterson:

This letter is in response to your Request for Additional Information dated October 17, 1995. All questions have been reproduced, preserving your numbering. The responses follow each question.

1. **Permit application fees are set forth in Rule 62-4.050, F.A.C. and are based on emission unit potential emissions (including fugitive emissions). Currently, the proper fee is $1000, however, a fee only $250 was submitted. Having said that, the Department is planning to discuss the issue of permit fees at its annual air meeting this week. I recommend that before you submit an additional fee, wait for confirmation of the proper amount.**

Response:
Fugitive emissions (and associated fees) are a current topic of interest for this project and other projects. The fees for *estimated fugitive emissions* should be different (for construction permitting) than the fees for *potential emissions*. Potential emissions are generally considered as "stack" emissions, and are regulated more stringently than fugitive emissions.

Furthermore, this is an after-the-fact application addressing a straightforward process. This type of application should not involve substantial review costs.

I request that application processing proceed while the fugitive emissions issues are clarified. If additional fees are ultimately required, Dixie Lime and Stone will promptly submit any deficit..

2. Please address the NSPS Subpart OOO applicability of the bin loading hopper and the Powerscreen hopper.

Response:
The bin loading hopper and the Powerscreen hopper are not considered to be storage bins under NSPS OOO because these hoppers do not provide for storage of nonmetallic minerals.

Additionally, front end loader dumping into feed hoppers is exempt from the opacity limitations of NSPS OOO [40 CFR 60.672(d)].

3. Is it correct that the vibratory feeder and the Hewitt Robbins impact crusher both feed the crusher underbelt?

Response:
That is correct. The Hewitt Robbins crushing plant has a single conveyor belt under the vibratory feeder and the crusher; this underbelt feeds the crusher stacker conveyor belt.

In contrast, the Cedar Rapids crushing plant has a conveyor under the wobble feeder, discharging onto the crusher underbelt, which discharges onto the crusher stacker.

4. How are Powerscreen unders and overs conveyed to stockpiles?

Response:
Powerscreen unders and overs fall to stockpiles by gravity. The vibrating screen deck is configured to allow formation of two distinct stockpiles - unders and overs.

If further questions arise, please do not hesitate to contact me.

Sincerely,

Steven C. Cullen, P.E.
Koogler & Associates

copy to: Chris Hertz (Dixie)