



RTP ENVIRONMENTAL ASSOCIATES INC.®

AIR · WATER · SOLID WASTE CONSULTANTS

1900 South Highway 14 · Suite 4-B

Greer, South Carolina 29651

(rtp@acsinc.net)

(864) 848-1303

Fax: (864) 848-1311

December 5, 1997

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**BUREAU OF
AIR REGULATION**

Mr. Willard Hanks
Department of Environmental Protection
Bureau of Air Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Subject: APAC-Georgia DRAFT Statewide Construction Permits Comments

Dear Willard:

I have reviewed the DRAFT APAC-Georgia Statewide Construction Permit with Corky Lane (APAC-Georgia). There are 2 operational limitations in each DRAFT construction permit that should be clarified.

1. **Section III. Emission Unit(s) - Specific Conditions, Operational Limitations, B.5.** The conditions states that the plant shall not operate for more than 2 years at any one site in Florida. This condition may not be appropriate for concrete batch plants because most contracts are short duration and it is impossible to determine where the next project may require a plant to be located. Additionally, the plant is usually shut down for extended periods dictated by weather conditions and project design. It is possible for a contract to continue for more than 2 years, but the batch plant may only operate 6 or 8 months during the entire life of a project and still remain on the same site.
2. **Section III. Emission Unit(s) - Specific Conditions, Operational Limitations, B.6.** This conditions states, ...and hourly consumption of raw materials shall not exceed:

Cement: 27 cubic yards

Flyash: 6.8 cubic yards

Sand and aggregate: 212 cubic yards

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This is a ***typical mix*** which will have some minor variation in component percentages and represents the average makeup of a concrete batch. The condition should read,

"Maximum production shall not exceed 270 cubic yards per hour. A typical batch formulation is,

***Cement: 27 cubic yards
Flyash: 6.8 cubic yards
Sand and aggregate: 212 cubic yards."***

Please call with any questions or comments. Thank you for all your help.

Sincerely,
RTP Environmental Associates, Inc.


Daniel E. Taylor
Principal

cc: Corky Lane, APAC-Georgia

File