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May 15, 2000

BUREAU OF AIR REGULATION

Mr. Bill Leffler
Florida Department of Environmental Protection
Division of Air Resources Management
2600 Blair Stone Road
Mail Station 5500
Tallahassee, Florida 32399-2400

Re: Air Permits for Portable Crushers and Screens

Dear Bill:

As we recently discussed, we are concerned about your requirement to provide serial numbers for the diesel units that power Florida Rock's various portable crushers, screens, and related equipment. We understand your assertion that the throughput capacity of a portable crusher or screen could potentially be increased by installing a larger more powerful engine. However, there are more factors involved in determining the throughput capacity of a unit than merely engine size. The real issue is whether a permitted crusher or screen is operating outside the parameters authorized in the permit.

This requirement would, in effect, regulate individual components that we do not believe were envisioned to be regulated under the Federal or State rules. In addition, it imposes a significant additional burden upon the permittee. For example, if the drive unit of a portable crusher or screen fails and needs replacement, this would necessitate notification of your Department. Since notifications must be made prior to the alteration of regulated equipment, this places the permittee in the position of either having to change the failed unit and submit an after-the-fact notification or potentially delay replacement of the component until the appropriate notice can be forwarded to your office.

Based upon the foregoing, we request that you reevaluate your stated policy on this matter.

Thank you for your thoughtful consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "J. Michael O'Berry". The signature is written in a cursive, flowing style.

J. Michael O'Berry, Manager,
Environmental Permitting Services

/jmo'b

cc: Roland Boney
Bob Martin
Fred Buckner
Don Darley
Jimmey Crossan