

RECEIVED

FEB 14 2000



February 11, 2000

BUREAU OF AIR REGULATION

Mr. William Leffler, P.E.
Florida Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Re: Statement of Non-Applicability of NSPS Subpart OOO

Dear Mr. Leffler:

This statement shall apply to the following pieces of equipment designated by Florida Rock Industries, Inc. as *not* subject to NSPS Subpart OOO in the Company's fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station.

Any such equipment designated as *not* subject to NSPS Subpart OOO was constructed prior to August 31, 1983 and has not been reconstructed per 40 CFR 60.15 as defined by 40 CFR 60.673. Such equipment has also not been modified per 40 CFR 60.14. Please note that Subpart OOO provides the following:

40 CFR 60.673 Reconstruction.

(a) The cost of replacement of ore-contact surfaces on processing equipment shall not be considered in calculating either the "fixed capital cost of the new components" or the "fixed capital cost that would be required to construct a comparable new facility" under §60.15. Ore-contact surfaces are crushing surfaces; screen meshes, bars, and plates; conveyor belts; and elevator buckets.

(b) Under §60.15, the "fixed capital cost of the new components" includes the fixed capital cost of all depreciable components (except components specified in paragraph (a) of this section) which are or will be replaced pursuant to all continuous programs of component replacement commenced within any 2-year period following August 31, 1983.

Mr. William Leffler, P.E.

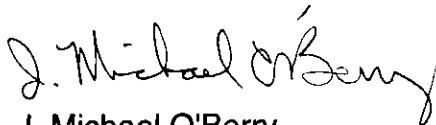
February 11, 2000

Page 2

Since this subpart specifically excludes the replacement cost of ore-contact surfaces, and limits the capital expenditures of remaining components to only those replaced in continuous component replacement programs within any two-year period, it is our understanding that routine maintenance of equipment rarely triggers this requirement.

I, the undersigned, am the authorized representative for Florida Rock Industries, Inc. on matters pertaining to environmental and permitting issues. I hereby certify that the foregoing statement is made freely and without coercion and is based upon information and belief formed after reasonable inquiry, and that it is true, accurate, and complete to the best of my knowledge.

Sincerely,



J. Michael O'Berry
Manager, Environmental
Permitting Services

/jmo'b

cc: Don Darley
Steve Cullen, P.E. – Koogler and Associates



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 8, 2000

Mr. Ken Conwell, Project Engineer
Koogler and Associates Environmental Services
4014 NW Thirteenth Street
Gainesville, Florida 32609

Re: Request for Additional Information

Florida Rock Industries, Inc – Applications for statewide permit for a relocatable crusher.

Dear Mr. Conwell:

On January 18, 2000, the Department received your application and fee for an air construction permit for a relocatable concrete and asphalt crusher, owned by Florida Rock Industries, Inc. The application is incomplete. In order to continue processing your application, the Department will need the additional information requested below. Should your response to any of the below items require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

1. Please provide copies of existing construction and operating permits for this facility. The application suggests this information is in the possession of the Department but fails to provide any old permit numbers or facility identification. Department records do not match with the equipment described in the application and information recorded for Permit 1110072-005-AO, which was issued on September 28, 1996, and which appears to be a modification of permit 1110072-003-AO, which had expired.
2. Please provide facts supporting the assertion that this Cedar Rapids Portable Crushing unit is not subject to 40 CFR 60, Subpart OOO, as specified on pages 11, 12 and 14 of the application.
3. Please provide a copy of the area map and plot plan referenced on page 10 of the application. Department records do not appear to include this information. The map was not attached to the application.
4. Please provide a list of each power unit, whether internal combustion engines, or electric motors associated with this relocatable crusher, including the manufacturer, model number, serial number and date of installation.
5. With respect to each item described in the response to query 4. above, please describe any repairs or renovations since this facility was last permitted, the nature and cost thereof, and further differentiating between ore or mineral contact surface and general mechanical, electrical, power-train and structural repairs
6. Can this transportable crusher unit be operated from commercial electric power without the use of the diesel generator set described as emission unit 002 in the application?
7. Please provide an estimate of the capital cost of a replacement transportable unit similar to that for which the permit application is directed.

8. For each crusher, or grinding mill, please provide: (i) The rated capacity in tons per hour of the existing facility being replaced; (ii) the rated capacity in tons per hour of the replacement equipment; (iii) the date of manufacture of such crusher or grinder. Has this assembly ever been of a size or capacity different than specified on page 13 of the application?
9. For a screening operation please provide: (i) The total surface area of the top screen of the existing screening operation being replaced; (ii) the total surface area of the top screen of the replacement screening operation; (iii) the date of manufacture of such screens or classifiers. Have any of these assemblies ever been of a size or capacity different than specified on page 13 of the application?
10. For each belt conveyor: (i) The width and speed of the existing belt being replaced; (ii) the width and speed of the replacement conveyor belt. Have any of these conveyors ever been of a size or capacity different than specified on page 13 of the application?
11. Please indicate dates and results of any written reports all performance tests conducted to demonstrate compliance with the standards set forth in Section 62-297.310 (7)(a)4.a. Florida Administrative Code (FAC) or 40 CFR 60.672, including reports of opacity observations made using Method 9 to demonstrate compliance with 40 CFR 60.672(b), (c), and (f), and reports of observations using Method 22 to demonstrate compliance with 40 CFR 60.672(e).
12. Please specify the nature of any materials to be crushed or processed by this unit, whether quarry run lime-rock, concrete recycling, asphalt pavement recycling, specific other materials, or combinations thereof.
13. Please provide calculations indicating any VOC and Carbon Monoxide emissions from this facility, which would presumably be emitted by the internal combustion engines.
14. Please describe the precautions to prevent emissions of unconfined particulate material. If this is to be a water spray, indicate application rates in gallons per ton and location of spray nozzles. Also please describe precautions to be applied to storage piles, and haul road or yard areas.
15. Please verify that internal combustion engines will operate on commercial No. 2 virgin diesel fuel; Please provide the maximum sulfur content by weight of the fuel oil to be burned; the estimated daily fuel consumption; and describe amount and facilities for fuel oil storage.

The Department will resume processing your application after receipt of the requested information. Rule 62-4.050(3), F.A.C., requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. Material changes to the application should also be accompanied by a new certification statement by the authorized representative or responsible official. Permit applicants are advised that Rule 62-4.055(1), F.A.C. now requires applicants to respond to requests for information within 90 days. If there are any questions, please call me at 850/921-9522.

Sincerely,

William Leffler, P.E.

WL

cc: Michael O'Berry, Authorized Representative, Florida Rock Industries, Inc.



FLORIDA ROCK INDUSTRIES, INC.
 POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

64-1278
611

CHECK NO.
1060005094

One Thousand Two Hundred Fifty Dollars And 00 Cents*****

VOID AFTER 90 DAYS

PAY TO THE ORDER OF

Florida Department of Environmental Pro
 Twin Towers Office Bldg
 2600 Blair Stone Road
 Tallahassee, FL 32399-2400

DATE
04-FEB-00

CHECK AMOUNT
*****1,250.00

[Handwritten Signature]
 AUTHORIZED SIGNATURE
 SIGNATURE HAS A COLORED BACKGROUND • BORDER CONTAINS MICROPRINTING

NationsBank Customer Connection, NationsBank, N.A.

⑈ 1060005094 ⑈ ⑆ 06 1 1 1 2788 ⑆ 329 995 9140 ⑈



FLORIDA ROCK INDUSTRIES, INC.
 POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

DATE 04-FEB-00 PAGE 1
 CHECK NUMBER: 1060005094

SUPPLIER NAME: Florida Department of Environmental Pro SUPPLIER NUMBER: 2538 COMPANY: 1011

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	DISCOUNT	AMOUNT
RELOCATECRUSH	28-JAN-00	CK-DONNA BAKER	0.00	1,250.00

RECEIVED
 FEB 09 2000
 BUREAU OF AIR REGULATION

THE ATTACHED CHECK IS IN PAYMENT FOR ITEMS DESCRIBED ABOVE

TOTAL \$0.00 \$1,250.00



FLORIDA ROCK INDUSTRIES, INC.

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Florida Department of Environmental Pro
Twin Towers Office Bldg
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DATE
04-FEB-00

CHECK AMOUNT
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[Handwritten Signature]
AUTHORIZED SIGNATURE
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NationsBank Customer Connection, NationsBank, N.A.

⑈ 1060005095⑈ ⑆061112788⑆ 329 995 9140⑈



FLORIDA ROCK INDUSTRIES, INC.

POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

DATE 04-FEB-00 PAGE 1

CHECK NUMBER: 1060005095

SUPPLIER NAME: Florida Department of Environmental Pro

SUPPLIER NUMBER: 2538

COMPANY: 1011

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	DISCOUNT	AMOUNT
RELOCATEUNIT	28-JAN-00	CK-DONNA BAKER	0.00	2,250.00

RECEIVED
FEB 09 2000
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POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

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CHECK NO.
1060005093

One Thousand Two Hundred Fifty Dollars And 00 Cents *****

VOID AFTER 90 DAYS

PAY TO THE ORDER OF

Florida Department of Environmental Pro
Twin Towers Office Bldg
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DATE
04-FEB-00

CHECK AMOUNT
*****1,250.00

[Signature]
AUTHORIZED SIGNATURE
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NationsBank Customer Connection, NationsBank, N.A.

⑈ 1060005093⑈ ⑆061112788⑆ 329 995 9140⑈



FLORIDA ROCK INDUSTRIES, INC.

POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

DATE 04-FEB-00 PAGE 1
CHECK NUMBER: 1060005093

SUPPLIER NAME: Florida Department of Environmental Pro

SUPPLIER NUMBER: 2538

COMPANY: 1011

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	DISCOUNT	AMOUNT
PERMITAIR	28-JAN-00	CK-DONNA BAKER	0.00	1,250.00

RECEIVED

FEB 09 2000

BUREAU OF AIR REGULATION

THE ATTACHED CHECK IS IN PAYMENT FOR ITEMS DESCRIBED ABOVE

TOTAL \$0.00 \$1,250.00



FLORIDA ROCK INDUSTRIES, INC.

POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

64-1278
611

CHECK NO.
1060005092

One Thousand Two Hundred Fifty Dollars And 00 Cents*****

VOID AFTER 90 DAYS

PAY TO THE ORDER OF

Florida Department of Environmental Pro
Twin Towers Office Bldg
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DATE
04-FEB-00

CHECK AMOUNT
*****1,250.00

[Handwritten Signature]
AUTHORIZED SIGNATURE
SIGNATURE HAS A COLORED BACKGROUND • BORDER CONTAINS MICROPRINTING

NationsBank Customer Connection, NationsBank, N.A.

⑈ 1060005092⑈ ⑆061112788⑆ 329 995 9140⑈



FLORIDA ROCK INDUSTRIES, INC.

POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

DATE 04-FEB-00 PAGE 1

CHECK NUMBER: 1060005092

SUPPLIER NAME: Florida Department of Environmental Pro

SUPPLIER NUMBER: 2538

COMPANY: 1011

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	DISCOUNT	AMOUNT
AIRPERMITCONST	28-JAN-00	CK-DONNA BAKER	0.00	1,250.00

RECEIVED
FEB 09 2000
BUREAU OF AIR REGULATION

THE ATTACHED CHECK IS IN PAYMENT FOR ITEMS DESCRIBED ABOVE

TOTAL \$0.00 \$1,250.00



64-1278
611

CHECK NO.
1060005091

Two Thousand Two Hundred Fifty Dollars And 00 Cents*****

VOID AFTER 90 DAYS

PAY TO THE ORDER OF

Florida Department of Environmental Pro
Twin Towers Office Bldg
2600 Blair Stone Road
Tallahassee, FL 32399-2400

DATE
04-FEB-00

CHECK AMOUNT
*****2,250.00

[Handwritten Signature]
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NationsBank Customer Connection, NationsBank, N.A

⑈ 1060005091⑈ ⑆061112788⑆ 329 995 9140⑈



DATE 04-FEB-00 PAGE 1
CHECK NUMBER: 1060005091

SUPPLIER NAME: Florida Department of Environmental Pro SUPPLIER NUMBER: 2538 COMPANY: 1011

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	DISCOUNT	AMOUNT
AIRCONSPERMIT	28-JAN-00	CK-DONNA BAKER	0.00	2,250.00

RE
FEB 0 2000
BUREAU OF AIR REGULATION
RECEIVED
FEB 09 2000
BUREAU OF AIR REGULATION

THE ATTACHED CHECK IS IN PAYMENT FOR ITEMS DESCRIBED ABOVE

TOTAL \$0.00 \$2,250.00



FLORIDA ROCK INDUSTRIES, INC.

POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

64-1278
611

CHECK NO.
1060004780

One Thousand Two Hundred Fifty Dollars And 00 Cents *****

VOID AFTER 90 DAYS

PAY TO THE ORDER OF

Florida Department of Environmental Pro
South District
2295 Victoria Ave Suite 364
Ft Myers, FL 33901-3881

DATE
14-JAN-00

CHECK AMOUNT
*****1,250.00

[Signature]
AUTHORIZED SIGNATURE

NationsBank Customer Connection, NationsBank, N.A.

SIGNATURE HAS A COLORED BACKGROUND • BORDER CONTAINS MICROPRINTING

⑈ 1060004780⑈ ⑆061112788⑆ 329 995 9140⑈



FLORIDA ROCK INDUSTRIES, INC.

POST OFFICE BOX 4667 JACKSONVILLE, FLORIDA 32201

DATE 14-JAN-00 PAGE 1
CHECK NUMBER: 1060004780

SUPPLIER NAME: Florida Department of Environmental Pro

SUPPLIER NUMBER: 2538

COMPANY: 1011

INVOICE NUMBER	INVOICE DATE	DESCRIPTION	DISCOUNT	AMOUNT
AIRPERMITJAN	12-JAN-00	CK-DONNA BAKER	0.00	1,250.00

THE ATTACHED CHECK IS IN PAYMENT FOR ITEMS DESCRIBED ABOVE

TOTAL \$0.00 \$1,250.00

INTEROFFICE MEMORANDUM

Sensitivity: COMPANY CONFIDENTIAL

Date: 28-Jan-2000 02:22pm
From: William Leffler TAL
LEFFLER_W
Dept: Air Resources Management
Tel No: 850/488-1344 222-3146 (home)

To: Thomas Tittle WPB (TITTLE_T @ A1 @ WPB1)

Subject: St lucie Quarry Unit 6 Refurbish and statewide permitting of Cedar Rapids Crusher.

Tom:

Would you all forward any information that you have on this unit. I know it is an old transportable machine that has been on "standby" service for several years. I cannot tell from the application how much work is being done to it, whetere it is being repowered or otherwise made subject to subpart 000 NSPS.

some descrete photographs and dates of last observed operations would be helpful.

Bill Leffler