



January 14, 1999

FLORIDA CRUSHED STONE COMPANY

W.C. Thomas
District Air Program Administrator
Department of Environmental Protection
Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

RECEIVED
JAN 15 1999
Department of Environmental Protection
BY SOUTHWEST DISTRICT

Re: Center Hill Mine
Response to Letter of Non-Compliance NCL-98-010
Air Permit #1190018-005-AO

Dear Mr. Thomas:

The purpose of this letter and the accompanying documentation is to address the possible violations identified in your letter of December 9, 1998. The operating permit for the Center Hill Mine, Permit #1190018-002-AO, which became effective in June 1997, represents the initial permitted operating parameters proscribed for this facility under 40 CFR 60 subpart 000.

During the time since implementation of the aforementioned permit, the facility has undergone many changes, due both to natural expansion and increased demand for the product supplied. It is important to us that during times of transition we maintain continued compliance, not only with 40 CFR 60, but also with all environmental regulations that apply to our operation.

The following will address each item listed in your Letter of Non-Compliance.

- a. By January 15, 1999, perform visible emissions testing on the three new conveyor belts authorized by Construction Permit 1190018-005-AC and submit an application for an operating permit.

Response: Additional review showed that the three "new" conveyor belts are not new, and are properly permitted as existing Emission Points 4, 5 and 6 (Belt Conveyors #10, #11 and #12) in Permit No. 1190018-002-AC.

At the time of permitting, we planned to work in two pits simultaneously. For various reasons, this plan was not implemented. The existing belts were shifted to a different pit, but no new belt conveyors were constructed.

For this reason and by this letter, FCS is surrendering Construction Permit 1190018-005-AC.

- b. By January 15, 1999, calculate and submit the consecutive 12-month total tons of limestone processed for each month in calendar year 1998. For example, the consecutive 12-month total for January 1998 will be the sum of the tons processed for the period 2/1/97 through 1/31/98. In the future, ensure consecutive 12-month totals are documented on the monthly visible emissions control record or on the production budget report.

Response: Consecutive 12-month total tons of limestone processed for each month in calendar year 1998 are as follows:

<u>Month</u>	<u>Year</u>	<u>Consecutive 12-month Tons</u>
January	1998	1,740,851.63
February	1998	1,786,386.88
March	1998	1,917,928.63
April	1998	1,950,482.13
May	1998	1,951,400.88
June	1998	2,005,897.88
July	1998	1,995,120.63
August	1998	2,008,199.38
September	1998	2,076,963.13
October	1998	2,075,330.13
November	1998	2,068,747.38
December	1998	2,000,414.88

Florida Crushed Stone will, in the future, ensure that consecutive 12-month totals are documented on the monthly visible emissions control record or on the production budget report.

- c. By January 15, 1999, submit a visible emissions test report for the new radial arm conveyor belt along with a description identifying the make, model, serial number and belt size. The Department will incorporate this description in the amended operating permit.

Response: This response package includes, as Attachment 1, results of visible emissions testing for the new radial stacker conveyor belt.

The radial stacker conveyor belt is described as follows:

Make: Onsite fabrication by FCS personnel
 Model: Radial Stacker #20 (was previously a fixed stacker)
 Serial Number: None
 Belt Size: 24"

The change for this belt conveyor from a fixed stacker to a radial stacker would be considered a "like-for-like" change for purposes of NSPS compliance.

- d. Comply with the startup notification requirements in 40 CFR 60, Paragraph 16, for the new limestone drying and processing facility.

Response: Applicable startup notification requirements for the new limestone drying and processing facility are found at 40 CFR 60.7, as follows:

40 CFR 60.7 Notification and record keeping

- (a) Any owner or operator subject to the provisions of this part shall furnish the Administrator written notification as follows:
- (1) A notification of the date construction (or reconstruction as defined under §60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
 - (2) A notification of the anticipated date of initial startup of an affected facility postmarked not more than 60 days nor less than 30 days prior to such date.
 - (3) A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

Date construction was commenced: September 1, 1998

Anticipated date of initial startup: April 12, 1999

Actual date of initial startup: Unknown at this time

- e. The permit for the new limestone drying and processing facility expires on December 31, 1998. As soon as possible, but no later than December 31, 1998, submit a request to extend the expiration date for this permit.

Response: This response package includes, as Attachment 2, a copy of a letter dated October 26, 1998 requesting the extension of the expiration date for this permit.

- f. Submit an updated description of control equipment for the new limestone drying and processing facility to show which dust collector vents Silos 1, 2 and 3 (SS-1, SS-2 and SS-3).

Response: This response package includes, as Attachment 3, an updated description of control equipment for the new limestone drying and processing facility that shows that dust collector 4 (DC-4) vents storage silo 3 (SS-3).

This information shows that storage silo 1 (SS-1) is vented into storage silo 2 (SS-2) which is in turn vented to storage silo 3 (SS-3), with emissions controlled by DC-4.

Attachment 1: Results of visible emissions testing for the new radial stacker conveyor belt

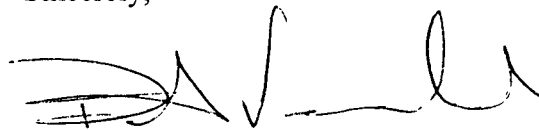
Attachment 2: Copy of a letter dated October 26, 1998 requesting the extension of the expiration date for limestone drying and processing permit

Attachment 3: Updated description of control equipment for the new limestone drying and processing facility

We hope that working on this matter with you and your staff will improve awareness and establish a line of communication that will prevent any future compliance problems.

If you have any questions, please do not hesitate to call me at (352) 787-0608.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pat Venable', with a stylized flourish at the end.

Pat Venable, REM
Environmental Coordinator

PV/rs

XC: Dennis Kenney
Steve Cullen, Koogler & Associates