



Florida Department of Environmental Protection

Southwest District
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Charlie Crist
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Jeff Kottkamp
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Michael W. Sole
Secretary

October 16, 2009

7775175

Mr. William D. Richardson, President
Crush-It Inc
P.O. Box 18539
Sarasota, FL 34276

Dear Mr. Richardson:

Thank you very much for attending the October 13, 2009 Workshop for Nonmetallic Mineral Nonmetallic Mineral Processing Plants (NMMP) and affected Asphalt Plants. Your participation and input was important to us.

After considering the comments you made during the workshop, the Department has determined that a RAP crushing system's manufacturer's maximum rated capacity does not need to be limited in an asphalt plant's non-Title V permit. The permit limitations on the number of emissions points and the crushing system's annual throughput (i.e., tons of RAP crushed during any consecutive 12-month period) are sufficient to limit the asphalt plant's potential to emit, providing reasonable assurance that the facility will not trigger Title V status.

The following provides additional clarification concerning testing of the RAP crushing system. If an off-site visible emissions test is used to demonstrate compliance with the RAP crushing system's VE limitations specified in an asphalt plant permit, the asphalt plant shall not operate the RAP crusher at rates greater than 110% of the actual processing rate measured during that off-site test. If the asphalt plant needs to operate the crushing system at a rate greater than 110% of the actual processing rate measured during that off-site test, the asphalt plant must test the crushing system for visible emissions on-site as soon as possible but no later than 30 days of placing the crushing system into operation.

The material presented at the workshop is located under "October 13, 2009 Air Program Workshop" and is posted at the following website: <http://www.dep.state.fl.us/southwest/air/>.

If you have any questions or comments regarding this matter, feel free to contact Ms. Cindy Zhang-Torres, P.E., by email at cindy.zhang-torres@dep.state.fl.us or by phone at (813) 632-7600, ext. 107.

Sincerely,

Mara Grace Nasca
District Air Program Administrator
Southwest District

MGN/cz