



Jeb Bush
Governor

Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

David B. Struhs
Secretary

May 20, 2002

Mr. Charles W. Roberts
President
C.W. Roberts Contracting, Inc.
Hwy 20 East
Hosford, FL 32334

Dear Mr. Roberts:

Re: Application dated 4/1/2002 (C.W. Roberts Contracting, Inc)
for construction permit of new Drum Mix Asphalt Plant

On 4/22/2002, the Department received your air pollution construction permit application for the above mentioned facility. In order to continue processing the application, the Department will need the following additional information pursuant to Rules 62-4.055 and 62-4.070(1), F.A.C.:

1. Refer to Page 1, identification of facility, item No. 5 states this asphalt plant is proposed to be relocatable. Please provide a listing of counties it proposes to move to in course of its operation.
2. Refer to Page 5, processing fee for the asphalt plant is noted as \$2,000.00. The Department determines this amount to be \$4,500.00 based on the SO₂ allowable emission of 85 tpy in page 20. Please send the cheque for the balance amount to process the application.
3. Refer to Page 5, processing fee for the RAP Crusher Unit – Portable is noted as \$1, 000.00. However, in page 6 under Portable RAP Crusher, it is mentioned that this unit is already operating in different C.W. Roberts facilities under a general permit No. 7775158-001-AG. It is not clear to the Department what is intended in this permit application as far as the usage of the RAP crusher is concerned. Do you want to continue operating this unit under its current general permit? If so, the fee submitted is not applicable. Please clarify.

"More Protection, Less Process"

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NOTE: There are limitations in using the general permit. Refer to DEP Form 62-210.920(10) eligibility determination item No. (h). The routine functions, such as crushing recycled asphalt (rap) at an asphalt plant, and non-routine activities, such as destruction of a building, are mentioned in the form. Please check the group you belong to and adjust the fee submittal accordingly. (A copy of the DEP form 62-210.920 (10) effective 6-21-01, is attached for ready reference).

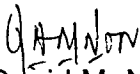
4. Refer to Page 6, insignificant activities – lime silo and GTR tank, please explain the purpose of lime silo at the plant. Also, explain the source of GTR at the facility. Is GTR being manufactured at the facility? If not, where does it come from? Is the GTR transfer/mixing with asphalt cement manually operated or pneumatically operated? Please explain.
5. Refer to Page 6, please list all the diesel engines with their individual capacities that will be used in the facility including the one used in asphalt drum mix plant. Please provide the fuel specification, emission calculations and opacity standard with the following information:
 - a. Type of fuel used;
 - b. Statement of sulfur content not to exceed 0.5% by weight;
 - c. Fuel consumption rate, gallons/hour and maximum yearly consumption rate as gallons/year; and
 - d. Emission calculations for CO, NO_x and SO₂ if required by the application.
6. Refer to Page 18, please provide reasonable assurance that you will comply with NSPS Subpart I PM limit of 0.04 gr/dscf. Baghouse loading calculations with control efficiency or manufacturer's guarantee for this PM limit will be acceptable. Please provide the methods of compliance with this limit. Mention the range of water column in case the baghouse pressure differential will be indicator for bag replacement.

Please submit the revised site plan and location alongwith the response of this letter or earlier.

NOTE - Rule 62-4.050(3), F.A.C. requires applications of this type 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. Therefore, your response to the above requests should be certified by a professional engineer. Please note that per Rule 62-4.055(1), F.A.C.: *"The applicant shall have ninety days after the Department mails a timely request for additional information to submit that information to the Department. Failure of an applicant to provide the timely requested information by the applicable date shall result in denial of the application."*

Your response should be received at SWD by 8/18/2002. If you have any questions, please call me at (813)744-6100 extension 112.

Sincerely,


Quaid M. Noor
Air Permitting Engineer
Southwest District, Tampa

QNI
Enclosure

cc: Mr. Max Lee, Ph. D, P.E., Koogler and Associates
4014 NW 13th Street, Gainesville, FL 32609

7775176-001-AC