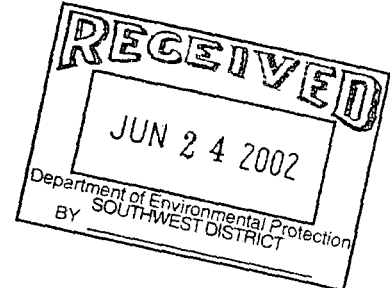
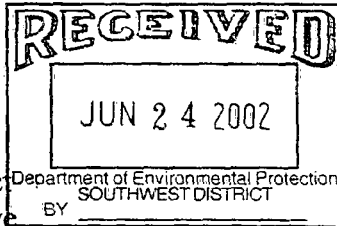


KOOGLER & ASSOCIATES
ENVIRONMENTAL SERVICES
4014 NW THIRTEENTH STREET
GAINESVILLE, FLORIDA 32609
352/377-5822 • FAX/377-7158

KA519-02-01
June 21, 2002

Quaid M. Noor
FDEP, Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619



SUBJECT: Response to Request for Additional Information
C. W. Roberts Contracting, Inc.
New Asphalt Drum Mix Plant – Sumter county
Air Construction Permit Application

490037 - 001 - AC
7775176

Dear Mr. Noor:

On behalf on C.W. Roberts Contracting, Inc. I am submitting the following additional information in response to your letter dated May 20, 2002. I have itemized my response corresponding to the format of your letter. An important change to the permit application should first be noted in that the location of the facility has changed. Attachment A provides four (4) copies of the corresponding revisions to the application information of facility location.

- 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.

Response:

The relocatable facility will remain at the specified location until such time that C.W. Roberts Contracting, Inc proposes to move elsewhere. At such time, required notifications will be submitted.

- 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 SO₂ allowable emission of 85 tpy on page 20. Please send the cheque for the balance amount to process the application.

Response:

A check in the amount of \$2,500.00 payable to "FDEP" is attached. I have reviewed the calculations and discussed them with Mr. Jerry Kissel at your FDEP District office. Based on our

discussion, I am revising the allowable calculation using the EPA factors that correctly account for SO₂ sorption in the asphalt production process. AP-42, Table 11.1-7 states in footnote C:
Fifty percent of the fuel-bound sulfur, up to a maximum (as SO₂) of 0.1 lb/ton of product, is expected to be retained in the product, with the remainder emitted as SO₂.

Four (4) copies of revised pages 20, 33, and 45 of the application are included in Attachment B. The calculations indicate that the facility-wide allowable SO₂ emissions amount to 59.96 tons SO₂ per year.

- 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.

Response:

Please note that the application states: **Currently, this Crusher is permitted to operate at C.W. Roberts facilities: 7770100, 7774811, and 7775118, and under a general permit No. 7775158-001-AG.**

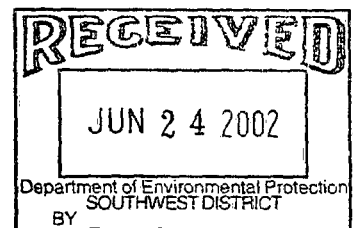
In the previous process of permitting the RAP Crusher, FDEP-Northwest District determined that only a minor modification to each facility permit would be required. The minor modification allows flexibility to operate the RAP crusher at any of these asphalt facilities for extended periods of time. As you mention in your letter, the general permit is limited in operation at separately permitted facilities. Therefore, we are requesting this facility permit, similar to other C.W. Roberts Contracting, Inc. facility air permits, include authorization of the portable RAP crusher. I have included a copy of the C.W. Roberts Contracting, Inc. Tallahassee plant permit language in Attachment C.

I indicated to Mr. Kissel that I was not sure how the Southwest District would handle this permitting request. Therefore, I submitted the new emission unit fee (\$1,000) versus a minor modification fee (\$250) as a conservative measure. For details on the previous permitting of the portable RAP crusher, I suggest you contact Bruce Mitchell, FDEP-Tallahassee (850) 488-0114 for his experience with our previous requests.

- 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.

Response:

Lime is routinely added to asphalt cement and is a common additive requirement of Florida Department of Transportation specifications. An identical lime silo is in operation at the C.W. Roberts Contracting, Inc. Tallahassee plant. I have included in Attachment D the manufacturer specifications of the silo.



Ground Tire Rubber (GTR) is very similar to asphalt cement and as such is commonly used to meet Florida Department of Transportation mix specifications. GTR and asphalt cement may be stored in similar tanks as both substances have similar properties. The material is transported by truck to the facility by the same suppliers of asphalt cement. GTR is added into the mix by the pneumatic system used for asphalt cement.

I specified the request to have GTR specifically allowed in this permit as other FDEP District permit writers have preferred to specify GTR in addition to asphalt cement to ensure that GTR is authorized for use. Therefore, I mentioned the GTR in the application to request that it will be specifically allowed in the text of the permit.

- 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....

Response:

The proposed facility will operate almost entirely on electric-grid power. Emissions from the asphalt burner are included in the section 3, Emission unit No. 1. The 120 mmBTU/hr asphalt burner unit is model StarJet 580, manufactured by Hauck. I have attached the manufacturer specifications of this burner (Attachment E).

Only the portable RAP crusher (see item 3) will operate using diesel-engine power. The Emission Unit Section 3, No. 3 indicates that the RAP crusher can use a maximum of 50,770 gallons of diesel fuel annually. The RAP crusher will operate in accordance with F.A.C. 62-210.300(3)(c)1.c. in which sulfur content of fuel will not to exceed 1% by weight and fuel usage will be included in the facility-wide limit of 1.2 million gallons per year. I have attached a copy of the RAP crusher specifications submitted for the general permit (Attachment F).

Mr. Kissel mentioned the concern of NO_x emissions exceeding SO₂ emissions. Calculations of NO_x emissions for the facility are 29.72 tpy.

- 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 of bag replacement.


Response:

The applicant will provide reasonable assurance to comply with NSPS limit of 0.04 gr/dscf by annual EPA Method 5 testing (see page 18, Allowable Emissions section). As well, the applicant will ensure compliance with the standard (0.04 gr/dscf) by maintaining the baghouse pressure drop between 2-6 inches of H₂O. Manufacturer literature is attached (Attachment G). Calculations are included in Attachment G to demonstrate that the baghouse emissions will comply with the standard.

Additional Comments: The insignificant activities of asphalt storage silos were not included in the original application. Please note that three CMI, model 210 asphalt storage silos are requested to be constructed and operated for this facility.

I would appreciate an expedited review of this application. I hope this information provides you all the information requested. Please contact me at your earliest convenience if you have questions or comments (352) 377-5822.

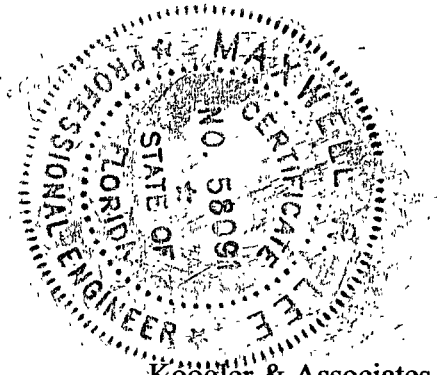
Sincerely,



Max Lee, Ph.D., P.E.-58091

6/21/02

DATE



Koogler & Associates

c. Charles Roberts and Joseph Shuler, C. W. Roberts Contracting Inc.

Max Lee: (352) 377-5822