



Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Mr. Charles W. Roberts, President
C.W. Roberts Contracting, Inc.
PO Box 188
Hosford, FL 32334

February 18, 2009

Re: Second Request for Additional Information
Air Operation Permit Renewal
Permit Project No.: 7775176-003-AO
C.W. Roberts Contracting, Inc.

Dear Mr. Roberts:

The Southwest District received your response to the Department's request for information (RAI) letter dated November 6, 2008, on February 12, 2009. Based on a review of the response by the Southwest District, we determined that the application is still incomplete. The following information is needed in order to continue processing this application pursuant to Rules 62-213.420(1)(b) and 62-4.070(1), F.A.C. Please provide any appropriate revised pages of the application form and all assumptions, calculations, and reference material(s) that are used or reflected in any of your responses.

1. Emissions Unit Information

You did submit information on a RAP crusher and screen conveyor in the construction permit application for 7775176-001-AC dated 4/18/02, however this piece of equipment was not identified as a separate emission unit in the construction permit or subsequent operation permit. In addition the RAP crusher has never been tested for visible emissions at this site. You stated in a response to an RAI concerning the original construction permit application dated 6/21/02 that the portable RAP crusher was permitted under general permit 7775158-001-AG. According to our files this crusher has been inactive since 12/2005. You must submit a construction permit application for the portable RAP crusher at this facility. If there are several portable crushers that could operate at this facility, choose the worst case crusher configuration (e. g., crusher with the highest capacity and the most emission points). Use the documentation attached to the first RAI as a guide to provide the required information for this new emission unit. Include the applicability of 40 CFR 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines to the engine supplying power to the crusher. This new emission unit must be tested for visible emissions at this site prior to the Department resuming processing of the operation permit renewal. If multiple crushers could operate at this facility each one must be tested for visible emissions prior to operating on site. This visible emissions test may count toward the annual test required under the general permit for the crusher.

2. Required Documentation

The September 2008 records submitted with the response to the Department's RAI had no data for RAP crushing operations. Please submit the December 2008 records or the most recent month that includes data for the RAP crushing operations.

Professional Engineer (P.E.) Certification Statement - 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. As a result your response should be certified by a professional engineer registered in the State of Florida. Please complete and submit a new P.E. certification statement page with your response.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter pursuant to Rule 62-213.420(1)(b)3., F.A.C. If you should have any questions, please contact Nancy E. Knight at 813 632-7600, ext. 120.

Sincerely,



Cindy Zhang-Torres
Air Permitting Supervisor
Southwest District

copies to:

Mr. Brad McNeil, Facility Manager
C. W. Roberts Contracting, Inc.
4208 CR 124-A
Wildwood, FL 34785

Dr. Maxwell Lee, Ph.D., P.E.
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4014 NW 13th Street
Gainesville, FL 32609