



Florida Department of Environmental Protection

Southwest District
13051 North Telecom Parkway
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 16, 2009

Mr. Joseph Shuler
CW Roberts Contracting Inc
P.O. Box 16279
Tallahassee, FL 32317

Dear Mr. Shuler:

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

Knight, Nancy

From: Knight, Nancy
Sent: Thursday, October 15, 2009 4:03 PM
To: 'Joseph Shuler'
Subject: CW Roberts Contracting, Inc., Wildwood Asphalt Plant (7775176)

The TPH limit for the RAP crushing system has been removed from your permit renewal. The annual throughput limit will remain in the permit. If you could confirm that the number of emission points and pieces of equipment are still representative of the largest crushing system you would bring on site, the Department can finalize your permit.

Thanks for your help.

Nancy E. Knight
Engineer Specialist
Southwest District Air Program
Department of Environmental Protection
(813) 632-7600 ext., 120