

Knight, Nancy

From: Knight, Nancy
Sent: Wednesday, April 08, 2009 12:31 PM
To: McDonald, Jim, Noor, Quaid
Subject: FW: Asphalt Plant Portable RAP Crushers
Attachments: general_permit_faq.doc

From: Phillips, Cindy
Sent: Wednesday, April 08, 2009 12:13 PM
To: Long, Terri; Knight, Nancy
Subject: RE: Asphalt Plant Portable RAP Crushers

Nancy, take a look at 3.01 in the attached GP FAQ. The real issue is whether or not this is a non-routine use of the crusher.

From: Long, Terri
Sent: Wednesday, April 08, 2009 9:12 AM
To: Phillips, Cindy; Knight, Nancy
Subject: RE: Asphalt Plant Portable RAP Crushers

I'm available, let me know a time

*Terri Long
Department of Environmental Protection
Division of Air Resource Management, OPAPM
2600 Blair Stone Road
Mail Station 5500
Tallahassee, Florida 32399
terri.long@dep.state.fl.us
850 921-9556
Suncom 291-9556*

From: Phillips, Cindy
Sent: Tuesday, April 07, 2009 3:20 PM
To: Knight, Nancy; Long, Terri
Subject: RE: Asphalt Plant Portable RAP Crushers

Yes, I'm available.

From: Knight, Nancy
Sent: Tuesday, April 07, 2009 3:01 PM
To: Phillips, Cindy; Long, Terri
Subject: FW: Asphalt Plant Portable RAP Crushers

I'm forwarding an email that I sent to Jonathan last week. He suggested I contact both of you. Would you be willing to speak to us about this issue? Would you be available tomorrow (Wed.) afternoon?

Thanks

Nancy

From: Knight, Nancy
Sent: Tuesday, March 31, 2009 3:47 PM
To: Holtom, Jonathan
Subject: Asphalt Plant Portable RAP Crushers

Mara Nasca, Cindy Zhang-Torres and me would like to set up a time to have a conference call with you and Trina Vielhauer about portable RAP crushers at asphalt plants. The issue started when I told the consultant for the CW Roberts plant in Wildwood that I would need a construction permit application to add a portable RAP crusher to the plant's permit (they had submitted a renewal application). The RAP crusher is currently mentioned in the permit as occasionally operating at the plant but it does not have its own emission unit ID. We want to make the crusher a separate emission unit and add a requirement to test (on site) any crusher that operates at the plant for visible emissions. The owner/operator does not want to submit a construction permit application and does not want to test any crusher that operates at the site (they want to use the test required by the GP). Permits written for their facilities in the NW District do not require on-site testing or that the crusher be a separate EU.

We did a brief survey of asphalt plant permits (with portable RAP crushers) in the other districts. It appears that the districts (other than NW) make the crusher a separate EU. They also require testing but don't specifically say on-site (although it is implied). Since this issue has implications for every district we would like to speak to you and Trina and get your thoughts.

I'm hoping you can give me some times you both would be available and I can coordinate with Cindy and Mara.

Thanks.

Nancy

Knight, Nancy

From: Knight, Nancy
Sent: Wednesday, March 25, 2009 8:52 AM
To: 'mlee@kooglerassociates.com'
Subject: RE: Renewal of AO - Wildwood - C. W. Roberts

10:30 would be best for us.

Nancy E. Knight
SWD Air Program

From: Max Lee [mailto:mlee@kooglerassociates.com]
Sent: Wednesday, March 18, 2009 5:47 PM
To: Knight, Nancy
Cc: Joseph shuler; 'Pradeep Raval'; Zhang-Torres
Subject: RE: Renewal of AO - Wildwood - C. W. Roberts

Hi Nancy,

Will next Friday, the 27th at 11 am work? I would appreciate if Quaid Noor can also join us in the conversation.

Max

From: Knight, Nancy [mailto:Nancy.Knight@dep.state.fl.us]
Sent: Wednesday, March 18, 2009 9:04 AM
To: mlee@kooglerassociates.com
Subject: RE: Renewal of AO - Wildwood - C. W. Roberts

Max

I spoke to Mara Nasca and Cindy Zhang-Torres about your request for a conference call. We will be happy to do that, however, the facility still must submit a construction permit application. There has never been a testing requirement for a RAP crusher in the permit for this facility. We cannot add that requirement without going through a construction permit. If you would still like to set up a conference call, please let me know of any available times next Wednesday through Friday.

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

From: Max Lee [mailto:mlee@kooglerassociates.com]
Sent: Monday, March 16, 2009 1:07 PM
To: Knight, Nancy
Cc: Zhang-Torres
Subject: Renewal of AO - Wildwood - C. W. Roberts

Zhang-Torres

Joseph Scholer }
Predeep Ravel }
Max Lee }
Mara }
Cindy }
Quaid }
Nancy }
took part in teleconference

From: Max Lee [mlee@kooglerassociates.com]
Sent: Monday, March 16, 2009 1:07 PM
To: Knight, Nancy
Cc: Zhang-Torres
Subject: Renewal of AO - Wildwood - C. W. Roberts

Hi Nancy,

Is there a time when we (C W Roberts, me and your folks) can conference call? The company is confused as to the fact they are not changing any activities at the Wildwood plant yet FDEP wants a construction permit. In particular, the costs and required public noticing of a AC permit is expensive and puts them under public exposure for no change in their operation.

I would appreciate this call as a way to resolve these questions.

Thank you,
Max

From: Knight, Nancy [mailto:Nancy.Knight@dep.state.fl.us]
Sent: Wednesday, March 11, 2009 2:05 PM
To: mlee@kooglerassociates.com
Subject: C. W. Roberts

It has come to our attention recently that construction permit applications for asphalt plants must include PTE for fugitive emissions. Below are parts of an email from Jonathan Holtom.
According to the definition of a Major Source/Title V Source, fugitive emissions must be included in the PTE calculations to determine Title V applicability if a unit or group of units is covered by the list of 28.
On the list of 28 (Item 27 in Rule 62-210.200(194)), the language that reads "Any other stationary source category, which as of August 7, 1980, is being regulated under Section 111 or 112 of the Act" means any NESHAP promulgated or any NSPS proposed prior to 8/7/1980.
If any emissions unit at the facility is on the list of 28, then all fugitive emissions at the facility must be evaluated and added to the PTE totals.
Since NSPS I for asphalt plants was proposed prior to 1980, they have to calculate fugitives from the entire site to see if potential PM10 emissions are greater than 100 tons per year.
Fugitives were NOT included in the evaluation of asphalt plant's conditional exemption from Title V.
Please include potential fugitive emissions for C.W. Roberts in your response to the Department's RAI dated 2/18/09.
Thank you for your help.
Nancy E. Knight
Engineer Specialist
Southwest District Air Program
Department of Environmental Protection
(813) 632-7600 ext., 120

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

_____ NOD32 3925 (20090311) Information _____

Knight, Nancy

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Sent: Wednesday, March 11, 2009 2:05 PM
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Please include potential fugitive emissions for C.W. Roberts in your response to the Department's RAI dated 2/18/09.

Thank you for your help.

Nancy E. Knight
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