

## **Knight, Nancy**

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**From:** Max Lee [mlee@kooglerassociates.com]  
**Sent:** Monday, July 20, 2009 5:12 PM  
**To:** Knight, Nancy  
**Cc:** 'Joseph Shuler'  
**Subject:** RE: New 40 CFR 60, Subpart OOO - Nonmetallic Mineral Processing Plants

Nancy,

To followup on my voicemail from last week, on behalf of C.W. Roberts, I agree the new Subpart OOO is applicable to subject crushing units constructed, modified or reconstructed after April 22, 2008 that operate at the facility and that the air permit should reflect those conditions. At this time all of the C.W. Roberts crushing units were constructed, modified or reconstructed prior to this date and are only potentially subject to the conditions for crushing units from 1983 to 4/22/2008. If crushing units are used onsite that are subject to the new Subpart OOO, then the crushing units will operate accordingly. For example, the test reports that will be submitted for subject crushing units will be subject to the new emission limits. The recordkeeping of the operations of the crushing units will be subject to the new subpart OOO.

Regarding the option to limit the fuel type and amount to crushers to 32,500 gallons/year, we want to keep the units operations limited to the fuel limits in the permit application. Thus, we do not want to limit the crushers to the unit exemption criteria.

I hope this answers your questions.

Regards,  
Max

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**From:** Knight, Nancy [mailto:Nancy.Knight@dep.state.fl.us]  
**Sent:** Tuesday, July 14, 2009 12:12 PM  
**To:** Joseph Shuler  
**Cc:** Max Lee  
**Subject:** New 40 CFR 60, Subpart OOO - Nonmetallic Mineral Processing Plants

A new 40 CFR 60 Subpart OOO was promulgated by EPA on April 28, 2009. The Department plans to adopt this Subpart in 62-204.200(8), F.A.C. in October 2009.

Trina Vielhauer, Bureau Chief of the Bureau of Air Regulation in Tallahassee determined that the new subpart should be in permits subject to Subpart OOO now (before state adoption) if the applicant agrees.

Table 1 of the Subpart published in the Federal Register <http://www.epa.gov/fedrgstr/EPA-AIR/2009/April/Day-28/a9435.htm> describes the changes. They include reductions in VE limits for crushers that commenced construction, modification or reconstruction on or after April 22, 2008. It also adds monitoring and recordkeeping requirements for wet suppression systems.

This Subpart does apply to your facility now. Please respond if you agree to having it incorporated into the permit renewal for the CW Roberts plant in Wildwood.

If you have any questions please call me. Thanks.

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

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## **Knight, Nancy**

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**Sent:** Tuesday, July 14, 2009 12:12 PM  
**To:** 'Joseph Shuler'  
**Cc:** 'Max Lee'  
**Subject:** New 40 CFR 60, Subpart OOO - Nonmetallic Mineral Processing Plants  
**Attachments:** 40CFR60 Subpart OOO.doc

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Nancy E. Knight  
Engineer Specialist  
Southwest District Air Program  
Department of Environmental Protection  
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Max Lee left a voice message on 7/15/09  
stating it would be OK to add the new OOO.  
He said they currently have no crushers  
built after 4/8/08.  
NEK