

Knight, Nancy

From: Max Lee [mlee@kooglerassociates.com]
Sent: Monday, October 26, 2009 10:15 AM
To: Knight, Nancy
Cc: jshuler@cwrcontracting.com
Subject: FW: C.W. ROBERTS CONTRACTING RELOCATABLE AP; 7775176-003-AO
Attachments: 7775156.003.ao.f.cwroberts.pdf

Good Morning Nancy,

Joseph and I reviewed the attached permit and noted the following items of concern.

- 1) Item A.3 We noticed that the fuel types are specified and do not include No. 3 and 4 fuel oil. The old permit did not limit the fuel types. The highly variable costs and availability of fuels can be a significant operations impediment. The general exemption FDEP rule followed to ensure the facility remains non-TV, 62-210.300(3)(c)2, FAC, does not limit the fuel type. We request to either not limit the number of the fuel oil or include No. 3 and 4.
- 2) Item A.14. We are requesting that the daily logging of the amount used of RAP and virgin materials be a requirement instead of logging items c, d. Item e will be a sum of RAP plus virgin. This condition, similar to the recent Hillsborough county AC permit for C. W. Roberts, allows for reasonable assurance of compliance to the mix made daily to ensure mix is not allowed per the condition during compliance testing.
- 3) Condition B.4-B.9: The permit limits the number of emissions points based on the specific layout in the application. However, the emission calculations for these points in the application are doubled as a conservative measure. So the permit should allow twice the number of emissions points which will allow flexibility to operations.
- 4) Is FDEP publishing a permit notice? I noticed the language of the permit indicated the right for petition (top of page 2 of 26) within 14 days of public notice. Will OGC (e.g., Ronni Moore) review this permitting action?

Please let us know your thoughts.

Best regards,
Max

From: Prickett, Patricia [mailto:Patricia.Prickett@dep.state.fl.us]
Sent: Thursday, October 22, 2009 1:44 PM
To: croberts@cwrcontracting.com
Cc: jshuler@cwrcontracting.com; mlee@kooglerassociates.com; Knight, Nancy; Zhang-Torres
Subject: C.W. ROBERTS CONTRACTING RELOCATABLE AP; 7775176-003-AO

Attention: Mr. Charles W. Roberts, President

Owner/Company Name: C.W. ROBERTS CONTRACTING, INC.
Facility Name: C.W. ROBERTS CONTRACTING RELOCATABLE AP
Project Number: 7775176-003-AO
Permit Status: FINAL
Permit Activity: OPERATION
Facility County: SUMTER

Click on the following link to access the permit project documents:
http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/7775176.003.AO.F_pdf.zip