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352/377-5822 ■ FAX/377-7158

Ms. Nancy Knight
Florida Department of Environmental Protection
Southwest District
13051 N. Telecom Parkway
Temple Terrace, Florida 33637-0926

Subject: C.W. Roberts Contracting, Inc. (Facility ID 7775176)
Permit No. 7775176-003-AO
Wildwood, Sumter County, Florida
Request for Permit Amendment

Dear Ms. Knight:

This letter is being submitted in response to the email you sent on Wednesday, August 25, 2010 requesting that the information presented to the Department in the permit amendment memorandum dated Thursday, August 19, 2010 be resubmitted in letter form, along with owner/authorized representative certification, professional engineer certification, and a \$250 processing fee. The owner/authorized representative certification, professional engineer certification, and processing fee are attached.

In response to our teleconference on Tuesday, July 27, 2010 that included persons from FDEP (Cindy Zhang-Torres, Danielle Henry, Nancy Knight), our firm (Veronica Sgro and Max Lee), and Joseph Shuler with C. W. Roberts Contracting, please find attached a list of potential reclaimed asphalt pavement (RAP) crushing system equipment associated with C.W. Roberts Contracting, Inc.'s Wildwood Facility (Permit No. 7775176-003-AO), EU 002 (Portable RAP Crushing System). In addition, potential emission calculations for the potential equipment are provided. Please note the potential emissions from this list of equipment are below the potential emissions submitted in the permit renewal application dated June 11, 2009. This list of equipment is the maximum amount of equipment that could be included in a current or future crusher system.

The format of the crusher system equipment listing allows for the maximum permutations of connections of the crusher equipment while identifying the individual equipment parts which can be individually assessed for applicability of the NSPS rules and tested accordingly. The format of the equipment listing also provides the FDEP the information to incorporate specific IDs for each emission point into its computer database and affords the flexibility to C.W. Roberts to use a range of setups as needed to maximize efficient use of operations equipment.

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Discussion – RAP Crusher Equipment

Instead of listing the equipment by potential emission points, the potential equipment list presents the equipment by category in order to provide flexibility in the RAP crusher configuration.

The list identifies two screen belts. The term “screen belt” is a general term used for conveyor belts used to process material coming from the screen(s). The term “screen belt” may be used as a substitute for a belt associated with the screening process in a general permit. For example, if an air general permit identifies a conveyor belt as a “fines belt” and fines belt process fine screened material, the screen belt identified in the equipment list would be synonymous with the fines belt.

Furthermore, due to the variations in RAP crusher configurations, three intermediary belts are identified in the conveyor belt category. The term “intermediary” may be used as a substitute for a belt identified differently in a general permit. For example, if an air general permit identifies a conveyor belt as a “short belt,” the intermediary belt identified in the equipment list would be synonymous with the short belt. These intermediary belts may be used to transport material between any two pieces of equipment.

Based on conversations with the Department, it is our understanding that RAP crushing equipment not subject to 40 CFR 60, Subpart OOO is not required to conduct annual testing. In addition, truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher is exempt from 40 CFR 60, Subpart OOO [Rule Reference 40 CFR 60.672(d)]. Moreover, per 40 CFR 60, Subpart OOO, in regards to conveying operations, nonmetallic mineral being transferred to a stock pile is *not* considered a transfer point [Rule Reference 40 CFR 60.671]. As 40 CFR 60, Subpart OOO addresses transfer points on belt conveyors, drop points from conveyor belts to stock piles do not need to be observed since it is not considered a “transfer point.”

Currently, C. W. Roberts Contracting, Inc. has three portable RAP crushing systems permitted under air general permits. The facility identification numbers and maximum rated capacities for each of these crushers are presented below for information purposes. Based on conversations with the Department, specific crusher information and configurations will not be addressed in the amended permit since additional crushers could be brought on site in the future.

Crusher ID	Facility ID No.	Maximum Rated Capacity
Crusher No. 1: Inertia Machine	7775155	300 TPH ¹
Crusher No. 2: Estee Crusher	7775170	75 TPH ²
Crusher No. 3: Terex Finley	7775581	80 – 160 TPH ¹

¹ Based on manufacturer information. Actual rates may vary depending on type and condition of material.

² Based on information provided for Permit No. 7775170-002-AG.

It has been discussed with the Department that the manufacturer's maximum rated capacity for any material may not be readily available for various reason. Since this information may not be available, it is requested that the record-keeping requirements regarding the manufacturer's maximum rated capacity presented in Permit No. 7775176-003-AO, Specific Conditions B.14 and B.18 be addressed.

It is our understanding that any visible emission test conducted on the crusher while at the Wildwood Facility will satisfy the annual testing requirements for Permit No. 7775176-003-AO and the crusher's air general permit.

In the memorandum dated August 19, 2010, it was requested that the on-site test requirement addressed in Permit No. 7775176-003-AO, Specific Condition B.9 be revised as presented below. Deletions are indicated with a ~~strike through~~; added language is indicated in ***shaded bold italics***.

B.9. On-Site Test Requirements – If adequate documentation as required by Specific Condition No. B.8. is not available, the permittee shall test ~~Emission Point Nos. 2 through 44~~ (as applicable) for visible emissions ***within the federal fiscal year*** ~~as soon as possible but no later than 30 days of placing the crushing system into operation after the effective date of this permit.~~ Once tested, the crushing system may not operate in a configuration that has more pieces of equipment and/or emission points than were operating during the test unless a new compliance test is conducted with the greater number of pieces of equipment and/or emission points. In no case shall the pieces of equipment and/or emission points exceed those in Specific Condition No. B.4. If the crusher remains on-site, the crushing system shall be tested for visible emissions annually during each federal fiscal year (October 1 – September 30) the crushing system is on-site.

[Rules 62-4.070(3) and 62-297.310(7)(a), F.A.C.]

Upon further discussion with the Department, it is our understanding that the Department will not revise Permit No. 7775176-003-AO, Specific Condition B.9 as requested above. However, if the portable crusher was tested offsite within the federal fiscal year and the facility had a copy of the report to document the test, then C.W. Roberts Contracting, Inc. would not be required to test the crusher on-site again during the federal fiscal year. If the crusher wasn't tested within the federal fiscal year and C. W. Roberts Contracting, Inc. brought it on site, then C.W. Roberts Contracting, Inc. would need to test the crusher on site within 30 days of bringing it onsite.

Discussion – Potential Particulate Matter (PM) Emissions from RAP Crusher

The potential emissions from the amended RAP crusher are based on an annual throughput rate of 200,000 TPY and emission factors provided by AP-42, Table 11.19.2-2. This procedure is the same as followed for the original application. The annual throughput rate is based on Permit No. 7775176-003-AO, Specific Condition B.3. The potential PM emissions from the portable RAP crushing system are 1.17 tons per year (TPY). It should be noted that not all of these pieces of equipment may be represented in a single crushing system; however, potential PM emission calculations were calculated for each piece of equipment in order to provide a conservative estimate.

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AP-42, Table 11.19.2-2 does not provide emission factors for hoppers or storage bins. However, in typical operations, a conveyor belt may feed a hopper or storage bin. As a result, it is assumed that conveyors will be feeding into a hopper or storage bin and that the emission factor for a conveyor transfer point can adequately estimate potential emissions from a hopper or storage bin.

For conveyor belt transfer points, it is assumed that there are two transfer points per belt – material being transferred *onto* the conveyor belt and material being transferred *off* of the conveyor belt. Based on this assumption, potential emissions from conveyor belt transfer points are based on doubling the product of the throughput and conveyor transfer point emission factor.

It is requested that C. W. Roberts Contracting, Inc. and Koogler and Associates, Inc. have an opportunity to review a DRAFT of the amended permit prior to issuing the final amended permit.

If you have any questions regarding the potential RAP crusher equipment list or potential PM emissions, please feel free to contact me at (352) 377-5822 or at vsgro@kooglerassociates.com.

Best Regards,



Veronica N. Sgro, P.E.
KOOGLER AND ASSOCIATES, INC.

Enc.

Cc: Joseph Shuler – C.W. Roberts Contracting, Inc. (*EMAIL + UPS Ground*)



REPLACEMENT INFORMATION FOR PERMIT SPECIFIC CONDITION B.4

C. W. Roberts Contracting, Inc.
 Wildwood, Sumter County, Florida
 Facility ID 7775176
 Permit No. 7775176-003-AO

EU 002: Portable Reclaimed Asphalt Pavement (RAP) Crushing System
 Maximum RAP Crusher Equipment

Category A		Category B		Category C		Category D		Category E	
Hopper ID	Description	Crushing ID	Description	Screening ID	Description	Conveyor Belt ID	Description	Storage Bin ID	Description
A1	Hopper 1	B1	Crusher 1	C1	Single Deck Screen	D1	Feed Belt	E1	Storage Bin 1
A2	Hopper 2			C2	Double Deck Screen	D2	Return Belt	E2	Storage Bin 2
A3	Hopper 3			C3	Triple Deck Screen	D3	Undercrusher Belt	E3	Storage Bin 3
						D4	Screen Belt 1 ⁽¹⁾		
						D5	Screen Belt 2 ⁽¹⁾		
						D6	Underscreen Belt		
						D7	Stacker Belt		
						D8	Stacker Belt		
						D9	Intermediary Belt 1 ⁽²⁾		
						D10	Intermediary Belt 2 ⁽²⁾		
						D11	Intermediary Belt 3 ⁽²⁾		

⁽¹⁾ Screen Belt may be a conveyor belt used to process material coming from a screen(s).

⁽²⁾ Intermediary Belt may be a conveyor belt that transports material between any two pieces of equipment (e.g. belt to belt; crusher to screen; crusher to belt; screen to belt; etc.)

C. W. Roberts Contracting, Inc.
 Wildwood, Sumter County, Florida
 Facility ID 7775176
 Permit No. 7775176-003-AO

**EU 002: Portable Reclaimed Asphalt Pavement (RAP) Crushing System
 Potential Emission Calculations**

PM Emissions

Operation	Throughput ⁽¹⁾	Emission Factor ⁽²⁾	Emissions (TPY)
Crusher	200000 TPY	0.0012 lb/ton	0.12
Single Deck Screen	200000 TPY	0.0022 lb/ton	0.22
Double Deck Screen	200000 TPY	0.0022 lb/ton	0.22
Triple Deck Screen	200000 TPY	0.0022 lb/ton	0.22
Hopper 1 ⁽³⁾	200000 TPY	0.00014 lb/ton	0.01
Hopper 2 ⁽³⁾	200000 TPY	0.00014 lb/ton	0.01
Hopper 3 ⁽³⁾	200000 TPY	0.00014 lb/ton	0.01
Storage Bin 1 ⁽³⁾	200000 TPY	0.00014 lb/ton	0.01
Storage Bin 2 ⁽³⁾	200000 TPY	0.00014 lb/ton	0.01
Storage Bin 3 ⁽³⁾	200000 TPY	0.00014 lb/ton	0.01
Transfer Points ⁽⁴⁾			
Feed Belt	200000 TPY	0.00014 lb/ton	0.03
Return Belt	200000 TPY	0.00014 lb/ton	0.03
Undercrusher Belt	200000 TPY	0.00014 lb/ton	0.03
Screen Belt 1 ⁽⁵⁾	200000 TPY	0.00014 lb/ton	0.03
Screen Belt 2 ⁽⁵⁾	200000 TPY	0.00014 lb/ton	0.03
Underscreen Belt	200000 TPY	0.00014 lb/ton	0.03
Stacker Belt	200000 TPY	0.00014 lb/ton	0.03
Stacker Belt	200000 TPY	0.00014 lb/ton	0.03
Intermediary Belt 1 ⁽⁶⁾	200000 TPY	0.00014 lb/ton	0.03
Intermediary Belt 2 ⁽⁶⁾	200000 TPY	0.00014 lb/ton	0.03
Intermediary Belt 3 ⁽⁶⁾	200000 TPY	0.00014 lb/ton	0.03
Total			1.17

⁽¹⁾ Throughput rate based on Permit No. 7775176-003-AO, Specific Condition B.3.

⁽²⁾ Emission Factor based on AP-42, Table 11.19.2-2.


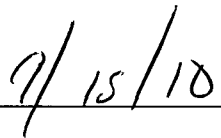
⁽³⁾ Potential emissions calculation based on conveyor transfer point emission factor.

⁽⁴⁾ Assumes two transfer points per belt. Potential emissions calculation is double the product of the throughput and conveyor transfer point emission factor.

⁽⁵⁾ Screen Belt may be a conveyor belt used to process material coming from a screen(s).

⁽⁶⁾ Intermediary Belt may be a conveyor belt that transports material between any two pieces of equipment (e.g. belt to belt; crusher to screen; crusher to belt; etc.).

Owner/Authorized Representative

1. Name and Title of Facility Contact: Charles W. Roberts, President
2. Facility Contact Mailing Address: Organization/Firm: C. W. Roberts Contracting, Inc. Street Address: P. O. Box 188 City: Hosford State: FL Zip Code: 32334
3. Facility Contact Telephone Numbers: Telephone: (850) 379-8116 Fax: (850) 379-8188
4. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative* of the facility addressed in this Application for Air Permit. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.</i>  _____ Signature  _____ Date

* Attach letter of authorization if not currently on file.

4. Professional Engineer Statement:

I, the undersigned, hereby certify, except as particularly noted herein, that:*

(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and

(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.

If the purpose of this application is to obtain an air construction permit for one or more proposed new or modified emissions units (check here [], if so), I further certify that the engineering features of each such emissions unit described in this application have been ~~designed~~ or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.

If the purpose of this application is to obtain an initial air operation permit or operation permit revision for one or more newly constructed or modified emissions units (check here [X], if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.

W. MONIA N 885

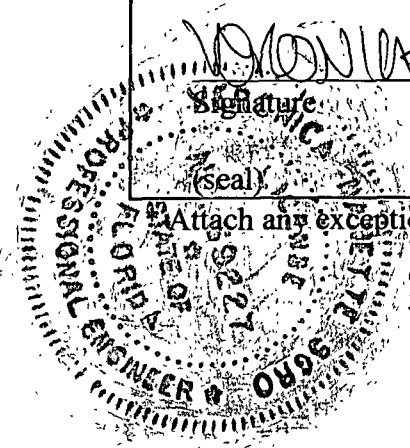
Signature

09/09/2010

Date

(Seal)

Attach any exception to certification statement.



C.W. Roberts Contracting, Inc. 11459 Department of Environmental Protection
 3372 Capital Circle NE 13051 N Telecom Parkway
 Tallahassee, FL 32308 Temple Terrace FL 33637-0926
 (850) 385-5060

Check No. - 107261
 Check Date - 09/20/10
 Stub 1 of 1

12/2

NOTE: DETACH BEFORE DEPOSITING - THIS IS NOT A CHECK

Invoice Number	Date	Description	Gross Amount	Deductions	Amount Paid
092010	092010		250.00		250.00
			----- 250.00		----- 250.00

Dept. Of Environmental Protection
SEP 21 2010
Southwest District

THIS CHECK IS VOID WITHOUT A COLORED BORDER AND BACKGROUND PLUS A KNIGHT & FINGERPRINT WATERMARK ON THE BACK. HOLD AT ANGLE TO VIEW

C.W. Roberts Contracting, Inc.
 3372 Capital Circle NE
 Tallahassee, FL 32308
 (850) 385-5060

CAPITAL CITY BANK - QUINCY
 03-04

Check No: 107261

PAY EXACTLY:

11459 09/20/10 \$*****250.00

TWO HUNDRED FIFTY AND 00/100 *****

Department of Environmental Protection
 13051 N Telecom Parkway
 Temple Terrace FL 33637-0926

Chy Roberts

 Authorized Signature

⑈ 107261⑈ ⑆063100688⑆6691682601⑈