

Golder Associates Inc.

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June 17, 1997

Mr. A. A. Linero, Administrator
New Source Review Section
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

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**BUREAU OF
AIR REGULATION**

Re: Tarmac Florida, Inc.
Slag Dryer
Final Permit No. 0250020-001-AC, PSD-FL-236

Dear Mr. Linero:

Tarmac has received the above referenced final construction permit for Tarmac's new slag dryer, issued by the Department on June 6, 1997. Upon review of the final permit, Tarmac has identified one specific condition that would be desirable to revise. The request is in regards to Specific Condition A.8 concerning the requirement to use reasonable precautions to minimize fugitive dust emissions. There are several concerns with the current wording of this condition, particularly in view of these conditions being carried over into the Title V application.

The second sentence of A.8, which reads "Unconfined PM emissions from the yard shall be minimized by applying the following reasonable precautions:". The concern with this statement is that the condition implies that all of the listed measures must be implemented. An agency or third party could contend that Tarmac was in violation of their permit if all the listed measures were not implemented.

Tarmac does in fact implement many of the measures listed; however, at any specific time, none or some of the measures are in use. This is because measures to minimize fugitive dust emissions are normally applied on an as needed basis, when visible emissions are observed.

Tarmac would like to retain its ability to determine the most appropriate measure(s) to implement at any specific time. Recommended wording for this condition which reflects this ability is presented below:

A.8 Except for the new slag dryer.... Unconfined PM emissions from the yard shall be minimized by applying one or more of the following reasonable precautions as necessary:

a) Paved parking and traffic.... Water trucks or vacuum type sweeper(s) shall be used to clean the paved areas. Sweeper(s) shall be maintained....

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b) Water sprinklers and wind breaks, enclosures, or covers shall be used as necessary to control unconfined PM emissions from the yard, unpaved roads, and other work areas.

c) - no change

d) - deleted

Thank you for consideration of these comments. Please call if you have any questions concerning this request.

Sincerely,

David A. Buff

David A. Buff, P.E.
Principal Engineer
Florida P.E. #19011
SEAL

DB/arz

cc: Al Townsend
Scott Quaas
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