TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Green Go Jacksonville
800 Grant Street, Suite 310
Denver, Colorado 80203
Facility ID No. 0310587

PROJECT

Application for Minor Source Air Construction Permit
Project No. 0310587-001-AC
Construction of an Asphalt Shingle Grinding Facility

COUNTY

Duval, Florida

PERMITTING AUTHORITY

Neighborhoods Department
Environmental Quality Division
Ed Ball Building, 214 North Hogan Street, Suite 500
Jacksonville, Florida 32202
Telephone: (904) 255-7100
Fax: (904) 255-7130

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (FS). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (FAC), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, FAC.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, FAC.

In accordance with the terms of its Specific Operating Agreement the City of Jacksonville, Neighborhoods Department, Environmental Quality Division has been delegated the Permitting Authority to process this determination on behalf of the Department.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which will be defined in this permit.

Facility Description and Location

Green Go Jacksonville, an asphalt shingle grinding facility, is categorized under Standard Industrial Classification Code No. 2951. The facility will be located in Duval County at 3800 Fairchild Street, Jacksonville, Florida 32254; UTM Coordinates: Zone 17, 429.7 km East and 3359.00 km North; Latitude: 30□ 21' 57.9" North and Longitude: 81□ 43' 52.5" West.

The facility is located in an area designated as; unclassifiable for the air pollutants particulate matter less than or equal to ten (10) micrometers (PM10), sulfur dioxide (SO2), and lead (Pb); an air quality maintenance area for ozone (O3); and in the area of influence of an air quality maintenance area for particulate matter (PM); pursuant to state and federal Ambient Air Quality Standards (AAQS), Chapter 62-204, Florida Administrative Code (F.A.C.), and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, FAC.
- The facility is not a major stationary source in accordance with Rule 62-212.400, FAC for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility is a non-Title V source of air pollution.

Project Description

This permit is for the construction of an asphalt shingle grinding facility. Shingles enter the site by the truckload. The shingles are then inspected. Rejected materials are loaded back onto the truck and removed. Those shingles that are accepted are placed in a temporary storage area until they can be tested for asbestos. The shingles are tested for asbestos at intervals of every incoming 25 tons. After testing for asbestos, the asbestos free shingles are ground up using a RotoChopper RG-1 Shingle Grinder. It is the only "purpose grinder" on the market that is made to solely grind shingles. During the grinding process, a spray bar injects precise amounts of water into the grinding chamber for dust control. The ground material is placed on an inclined belt and dropped into a pile.

Processing Schedule

January 22, 2014 - Received the application for a minor source air pollution construction permit.

2. PSD APPLICABILITY

PSD Applicability for Project

The facility is not a major stationary source of air pollution for PSD purposes because the potential emissions of PSD air pollutants are less than 250 tons per year pursuant to Rule 62-210.200(189), FAC and Rule 2.301, JEPB.

This project is not subject to PSD preconstruction review requirements since the proposed project itself has potential emissions of PSD air pollutants that are less than 250 tons per year pursuant to Rule 62-210.200(174), FAC and Rule 2.301, JEPB.

The facility is a minor source of air pollution in because the potential emissions of regulated air pollutants are less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) are less than 10 tons per year for a single HAP and less than 25 tons per year for total HAP pursuant to Rule 62-210.200(173), FAC and Rule 2.301, JEPB.

3. APPLICATION REVIEW

Discussion of Emissions

Due to the water spray and size of the granules, there are little or no particulate emissions

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year pursuant to Chapter 62-210, FAC, and Jacksonville Environmental Protection Board (JEPB), Rule 2.301.

Local Requirements

This facility is subject to Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 365 [Hazardous Regulated Substance Program], Chapter 376 [Odor Control] of the Ordinance Code of the City of Jacksonville, Title X; and Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice], and Rule 2, Part Numbers I through III and Part Numbers X through XIV [Air Pollution Control], JEPB.

State Requirements

This facility is subject to the applicable sections of Chapter 403, F.S. and Rules 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

4. PRELIMINARY DETERMINATION

The Permitting Authority makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Mr. Harry D. Smith is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting Mr. Smith at (904) 255-7196 or by e-mailing him at hsmith@coj.net.

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