Florida Department of Environmental Protection

Memorandum

TO: Charles Harp
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: January 29, 2013
SUBJECT: Evaluation Summary for Bonsal American, Inc., Pensacola Plant 0330109-011-AO, Escambia County

We recommend issuing a permit to Bonsal American, Inc. to operate their Pensacola Plant. This is a renewal of permit 0330109-009-AO, effective February 29, 2008. Permit modification 0330109-010-AO was issued September 11, 2008 which revised permit 0330109-009-AO by incorporating permit 0330109-008-AC.

Process Description. This facility processes and packages premixed dry concrete mix, sand mix (masonry cement), and Portland cement. These products are pneumatically blown into bags through filling pipes. There are two packaging machines at the facility. One is used only for Portland cement, and the other is used for packaging premixed concrete and/or sand mix. Process raw materials include sand, gravel and two types of cement. Portland cement is used in packaging premixed concrete, and masonry cement is used in the packaging of sand mix. Both are trucked in and pneumatically pumped into storage silos. Sand and gravel are trucked onsite and stored in stock piles where they are then fed through a drum dryer, similar in construction and function to that in an asphalt plant, to eliminate moisture before being mixed and packaged with cement as a dry concrete mix.

Pollution Control Equipment. Particulate emissions from the cement silos, holding bins and conveyors are controlled by six permitted baghouses (BH1 – BH4, BH6 and BH7). The emissions created from pneumatically conveying masonry cement into its holding bin located adjacent the screen house are controlled by a baghouse (BH-5). However, since this baghouse and its discharge are located inside the facility (indoors), BH-5 is not required to be permitted or tested.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	3.1	N/A	N/A
SO2	N/A	N/A	0.14	N/A	N/A
VOC	N/A	N/A	0.3	N/A	N/A
NOx	N/A	N/A	0.46	N/A	N/A
CO	N/A	N/A	7.0	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-296.414(1)	N/A	N/A	Not more than 5% opacity	

{Permit Note: Estimated emissions are based on facility-wide production rates that limit tons the facility can produce and the amount of PM and CO generated using AP 42 Table 11.-11 and Table 11.1-5 and on the continuous use of the baghouse fans for BH-6 and BH-7}

Applicable Rules & Regulations. This source is regulated in accordance with Rule 62-296.414(1), F.A.C., and has a 5% opacity limit on all emissions points.

Compliance Monitoring. All of the baghouses (except BH-5, which exhausts inside the building) will be subject to annual 30-minute visible emissions tests.

Compliance History.
2012 – Facility noted to be "In-Compliance".
2011 – MNC Facility failed to maintain records. No penalty assessed and case closed with a status of CWOE 5/19/2011.
2010 - 2008 - Facility noted to be "In-Compliance".

Fee Summary. This is an AO2B ($1,000 fee) minor source with no stack test.

AMJ/c