Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF FINAL PERMIT

Mr. Phil Greggs, Technical Services Manager
R P Minerals
201 S.W. 14th Avenue
Pompano Beach, Florida 33069

VIA ELECTRONIC MAIL
RETURNED E-MAIL RECEIPT REQUESTED

Dear Mr. Greggs:

Enclosed is construction permit number 0112730-001-AC to construct an air pollution source issued pursuant to Section 403.087 of the Florida Statutes, Broward County's Specific Operating Agreement with the Florida Department of Environmental Protection, and Broward County Code Chapter 27 Article IV which adopts Florida Administrative Code (FAC) 62-4, 62-296 and 62-297.

Persons whose substantial interests are affected by this permit have a right, pursuant to Section 120.57, Florida Statutes, to petition for an administrative determination (hearing) on it. The petition must conform to the requirements of Chapters 62-103 and 28-5.201, FAC, and must be filed (received) in the in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 within fourteen (14) days of receipt of this notice. Failure to file a petition within the fourteen (14) days constitutes a waiver of any right such person has to an administrative determination (hearing) pursuant to Section 120.57, Florida Statutes and Chapter 27. This permit is final and effective on the date filed with the Clerk of the PPRAQD unless a petition is filed in accordance with this paragraph or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, FAC. Upon timely filing of a petition or a request for an extension of time, this permit will not be effective until further Order of the PPRAQD. When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, in the Office of the Broward County Attorney at 115 South Andrews Avenue, Suite 423, Fort Lauderdale, Florida 33301-1872 and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Broward County, Florida
POLLUTION PREVENTION, REMEDIATION AND
AIR QUALITY DIVISION

Daniela Banu

Daniela Banu, Air Quality Administrator

Broward County Board of County Commissioners
Sue Gunzburger • Dale V.C. Holness • Kristin Jacobs • Chip LaMarca • Ilene Lieberman • Stacy Ritter • John E. Rodstrom, Jr. • Barbara Sharief • Lois Wexler
www.broward.org

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this written Notice of Final Permit(including the Final Permit and the Final Determination) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with e-mail receipt requested before the close of business on 9/19/2011 to the persons listed below.

Lennon Anderson, P.E., SFDEP, Air Section, Lennon.Anderson@dep.state.fl.us

Veronica N. Sgro, P.E., Koogler & Associates, Inc. vsgro@kooglerassociates.com

Phil Greggs, R P Minerals, pgregg@sgm.cc

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 9/19/2011 (Date)

Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324
954-519-1260 • FAX 954-519-1495

NOTICE OF AIR POLLUTION PERMIT

ISSUED TO:

PERMITTEE:
R P Minerals.
Authorized Representative:
Phil Greggs, Technical Services Manager
201 S.W. 14th Avenue
Pompano Beach, Fl 33069

AIRS ID NO: 0112730
Permit Number: 0112730-001-AC
Issue Date: September 19, 2011
Expiration Date: April 8, 2012

Facility Name: R P Minerals

Project Description: Construction Permit R P Minerals for a sand drying plant, SIC Code: 1442
Location: 201 S.W. 14th Avenue, Pompano Beach, Fl 33069.
Lat/Long: 26°33'44" N / 80°08'31" W

UTM: Zone 17; 585.7 Km E; 2901.2 Km N

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). The above named Permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD) and made a part hereof.

In accordance with: There are no previous permits. The construction application was received on April 8, 2011, additional information received June 15, 2011 and August 9, 2011, Notice of Intent to Issue Permit was issued August 19, 2011, Public Notice was published in the Sun-Sentinel newspaper September 2, 2011 (none are attached).

This permit is organized by the following sections.
1. Facility Description
2. General Conditions
3. Facility-wide Conditions
4. Emissions Unit Specific Conditions

Executed in Broward County, Florida

Daniela Banu
Air Quality Administrator
Broward County Pollution Prevention, Remediation and Air Quality Division

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1. FACILITY DESCRIPTION

The facility is a sand drying plant located at 201 S.W. 14th Avenue Pompano Beach, Florida 33069. The wet feed sand is brought on site and deposited into feed bunkers, which feeds the sand to the dryer. Next, the sand is dried in an Aesco/Madsen Counter flow drum dryer. The material flows in the drum in the same direction of the exhaust gases. The dryer is equipped with a Genco Astraflame Model AF25 burner that burns liquid propane or natural gas. Particulate matter emissions from the dryer are controlled by a cyclone followed by a baghouse. Following drying operations, the dried sand is screened and then stored in silos. The screening operation is enclosed and ducted to the cyclone and baghouse. The dried sand is transferred to the silos using enclosed screw conveyors. The belt conveyor, feeding wet sand is not enclosed, but according to facility personnel, dust emissions are controlled by wet suppression; since the material is already wet. Emissions from the drum consist of water (as steam evaporated from the aggregate); PM; products of combustion; CO; and small amounts of organic compounds of various species including VOC, and HAP). The CO and organic compound emissions result primarily from incomplete combustion of the fuel. The dried sand is used in the construction industry. There will be no bagging operation at this facility.

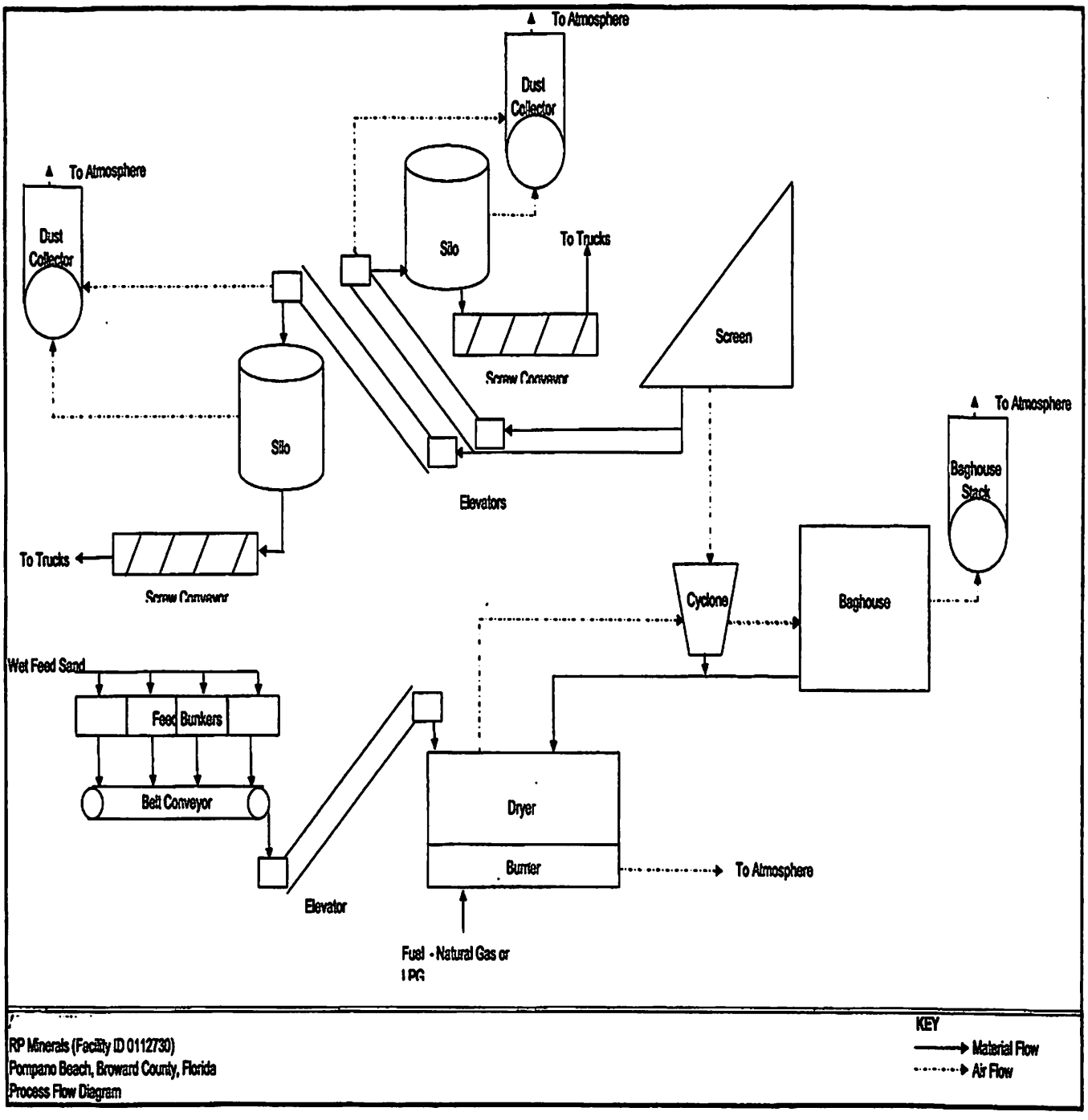
The most significant ducted source of emissions is the rotary drum dryer. The air emissions, from the dryer, are fugitive in nature since there is no air pollution control at the dryer. According to the flow diagram, the only exhaust stack is at the baghouse. The air emissions from the dryer are directed to the cyclone and to the baghouse. The maximum production rate of this plant is 75 tons per hour. The maximum heat input of the natural gas and liquefied propane gas is 4.0 mmBTU/hr. The fuels burned at the dryer are liquefied propane gas and natural gas. This operation is designated as natural minor source of air emissions based upon the potential emissions of regulated pollutants. Records of fuels used at the dryer and air pollutant emissions calculations from the operation will be maintained on a twelve-month consecutive period to demonstrate natural minor source status at all times.

The applicable visible emissions limitation is a facility-wide limitation, per DARM-PER-33, Guidance on the Use of the General Visible Emissions Standard, Rule 63-296.320(4)(b), F.A.C. because there is no applicable allowable mass emissions limitation such as F.A.C. 62-296.320(4)(a) – Process Weight Table. Based upon the nature of the operation, F.A.C. 62-296.320(4) does not apply, since there is no material or process change through a chemical or physical process. The raw material is the wet sand and the finished product is the dried sand. 40 CFR 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants does not apply, this federal rule does not apply to wet materials processing operations; and there is not a crushing and/or grinding operation at the site. 40 CFR 60, Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries does not apply because this facility processes construction sand rather than industrial sand. Also, the operation does not qualify as mineral industry.

The figure on the next page depicts the flow diagram of this plant. Based upon the potential emissions this facility is considered a natural minor source of air pollution at this time.

The facility consists of the following emissions unit:

E.U. ID No.	Brief Description
001	Sand drying plant consisting of an Aesco/Madsen Model DM 6828 counter flow liquefied propane gas and/or natural gas fired drum dryer, one Madsen cyclone Model 1080, one Aesco/Madsen baghouse Model ASB-240 and two storage silos. There is a dust collector on top of each silo to control air emissions from the silos and bucket elevator system. Dust particles from the cyclone are returned to the dryer. The maximum production rate is 75 tons per hour. The maximum annual fuel usage rate is based upon the maximum rated capacity of the dryer burner of 4.0 MMbtu/hr.



RP Minerals (Facility ID 0112730)
Pompano Beach, Broward County, Florida
Process Flow Diagram

2. GENERAL CONDITIONS

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The Permittee is placed on notice that the PPRAQD will review this permit periodically and may initiate enforcement action for any violation of these conditions.
[Rule 62-4.160 (1), F.A.C.]

2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPRAQD.
[Rule 62-4.160 (2), F.A.C.]

3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
[Rule 62-4.160 (3), F.A.C.]

4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interest have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
[Rule 62-4.160 (4), F.A.C.]

5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and FDEP rule, unless specifically authorized by an order from the PPRAQD.
[Rule 62-4.160 (5), F.A.C.]

6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by PPRAQD and FDEP rules.
[Rule 62-4.160 (6), F.A.C.]

7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
   (a) Have access to and copy any records that must be kept under conditions of the permit;
   (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPRAQD and FDEP rules.
   [Rule 62-4.160 (7), F.A.C.]

8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPRAQD with the following information:
   (a) A description of and cause of noncompliance; and
   (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQD for penalties or for revocation of this permit.
   [Rule 62-4.160 (8), F.A.C.]

9. Reporting Noncompliance. The Permittee shall report any periods of noncompliance to the PPRAQD immediately by phone at 954-519-1499 or by Email at EPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.
   [Rules 62-4.130 and 62-4.070(3), F.A.C.]

10. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPRAQD, may be used by the PPRAQD as evidence in any enforcement proceeding arising under the Florida Statues or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
    [Rule 62-4.160 (9), F.A.C.]

11. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or FDEP rules.
    [Rule 62-4.160 (10), F.A.C.]

12. Permit Transfer. This permit is transferable only upon PPRAQD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the PPRAQD.
    [Rule 62-4.160 (11), F.A.C.]

13. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
    [Rule 62-4.160 (12), F.A.C.]

14. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:

    (a) Upon request, the Permittee shall furnish all records and plans required under FDEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQD.
    (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPRAQD rule.
    (c) Records of monitoring information shall include:
        1. The date, exact place, and time of sampling or measurements;
        2. The person responsible for performing the sampling or measurements;
        3. The dates analyses were performed.

4. The person responsible for performing the analyses;
5. The analytical techniques or methods used;
6. The results of such analyses.

[Rule 62-4.160 (14), F.A.C.]

15. Information Submittal. When requested by the PPRAQD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPRAQD, such facts or information shall be corrected promptly.
[Rule 62-4.160 (15), F.A.C.]

16. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.
[Broward County Code, Sec. 27-173]

3. FACILITY-WIDE CONDITIONS

17. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

18. Volatile Organic Compound Emissions or Organic Solvent Emissions. No person shall store, pump, handle, process, load, unload or use in any process or installation volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the PPRAQD.
[Rule 62-296.320(1), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(f)]

19. General Visible Emissions. No person shall cause, let, permit, suffer or allow being discharged into the atmosphere any air pollutants from sources, the opacity of which is equal to or greater than 20 percent. If the presence of uncombined water is the only reason for failure to meet visible emission standards given in this section, such failure shall not be a violation of this prohibition.
[Rule 62-296.320(4) (b), F.A.C. and Broward County Code, Section 27-175(i)]

20. Unconfined emissions of particulate matter. No person shall cause, let, permit, suffer or allow emission of particulate matter from any source whatsoever, including but not limited to vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing or handling without taking reasonable precautions to prevent such emissions.
Reasonable precautions may include, but shall not be limited to, the following:

a) Paving and maintenance of roads, parking areas and yards;
b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing;
c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar sources;
d) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the source to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne;
e) Landscaping or planting of vegetation;
f) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter;
g) Confining abrasive blasting where possible;

h) Enclosing or covering of conveyor systems.
[Rule 62-296.320(4) (c), F.A.C., Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-177(b)]

21. Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of any provisions of Broward County Codes.
[Rule 62-4.070(3), F.A.C. and Broward County Code, Sec. 27-175(b)]

22. Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650 F.A.C and Broward County Code, Sec. 27-175(c)]

23. Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.

24. Special Compliance Tests. When PPRAQD, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a PPRAQD rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the PPRAQD.
[Rule 62-297.310(7) (b), F.A.C.]

25. Operating Permit. Sixty days before the expiration date of this construction permit, the permittee shall apply for an operation permit using the forms incorporated by reference in the specific rule chapter for this type of permit.
[Rule 62-4.090 F.A.C.]
{Permitting Note: The Permittee may also elect to submit the application electronically using the Electronic Permit Submittal and Processing system (EPSAP) via the http://www.dep.state.fl.us/air/software.htm website, along with the processing fee established in Rule 62-4.050(4), F.A.C. , [62-4.090(1) and 62-4.050(4), F.A.C.]

4. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Description of Emissions Unit
001	Sand drying plant consisting of an Aesco/Madsen Model DM 6828 counter flow liquefied propane gas and/or natural gas fired drum dryer, one Madsen cyclone Model 1080, one Aesco/Madsen baghouse Model ASB-240 and two storage silos. There is a dust collector on top of each silo to control air emissions from the silos and bucket elevator system. Dust particles from the cyclone are returned to the dryer. The maximum production rate is 75 tons per hour. The maximum annual fuel usage rate is based upon the maximum rated capacity of the dryer burner of 4.0 MMbtu/hr.

Emission Limiting Standards

26. The maximum production rate of this plant is 75 tons per hour and 657,000 tons per year.
[Rule 62-4.070(3) F.A.C., construction permit application received April 8, 2011]

27. The fuels allowed to be burned at the dyer are only liquefied propane gas and natural gas. Maximum liquefied propane gas consumption is limited to 372.8 thousand gallons burned in any consecutive twelve-month period. Maximum natural gas consumption is limited to 33.4 mmcf (million cubic feet) in any consecutive twelve-month period.
[Rule 62-4.070(3) F.A.C., construction permit application received April 8, 2011, additional information received June 15, 2011]

Recordkeeping and Reporting Requirements

28. In order to demonstrate compliance with Specific Conditions Nos. 27 and 28 of this section, the permittee shall maintain records at the facility for a period of five (5) years from the date the records were created and be made available for PPRAQD staff review, if necessary of the following:

    a. The production rate of the plant in tons in any consecutive twelve-month period.
    b. The amount of liquefied propane gas and/or natural gas used at the dryer in any consecutive twelve-month period.

    [Rule 62-4.070(3), F.A.C.]

29. The permittee shall keep records and calculate PM/PM10, SOx, NOx, CO and VOC emissions emitted at the dryer and from the fuel(s) burned, on a consecutive twelve- month period, in order to demonstrate maintenance of natural minor source status.
[Rule 62-4.070(3), F.A.C.]

30. Compliance Test Report Submittal. If a compliance test is required according to Specific Condition No. 24, the compliance test report shall be submitted to the PPRAQD as soon as practicable, but no later than 45 days after the last test is completed.
[Rule 62-297.310(8) (a) & (b), F.A.C.]