



# Florida Department of Environmental Protection

Northwest District  
160 Governmental Center, Suite 308  
Pensacola, Florida 32502-5794

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi A. Drew  
Secretary

October 4, 2010

*By Electronic Mail, Received Receipt Requested*  
eddymac1@hotmail.com

Mr. Ed McLeod  
General Manager  
Sunbelt Crushing, LLC  
3164 Midtown Park South  
Mobile, Alabama 36606

Dear Mr. McLeod:

On September 9, 2010, a Department representative with the Air Resource Management Program inspected your facility, ID 7775169. A copy of the inspection report is enclosed.

The inspection and a review of Department records indicate the facility was in violation of Rule 62-210.310(2)(a)1. , Florida Administrative Code, for locating the crusher to a facility having the potential to emit ten tons per year or more of any hazardous air pollutant, 25 tons per year or more of any combination of hazardous air pollutants, or 100 tons per year or more of any other regulated air pollutant. Through this letter, the Department is exercising its enforcement discretion and will not pursue any additional air enforcement action at this time for the violation cited above. This decision is based on stopping operation of the crusher immediately after being notified of the violation; and promptly moving the crusher off the Eglin site.

Please review the Recommendations section of the report in order to ensure continued compliance in the future.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Carol Melton at 850/595-0616 or [carol.melton@dep.state.fl.us](mailto:carol.melton@dep.state.fl.us).

Sincerely,

Rick Bradburn  
Air Program Administrator

RB/cm/c

Enclosure

c: Harry Fortenberry, Eglin AFB: [harry.fortenberry@eglin.af.mil](mailto:harry.fortenberry@eglin.af.mil)

*"More Protection, Less Process"*  
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# NON-METALLIC MINERAL PROCESSING PLANTS



## COMPLIANCE INSPECTION CHECKLIST

**INSPECTION TYPE:** ANNUAL (INS1, INS2)  COMPLAINT/DISCOVERY (CI)   
 RE-INSPECTION (FUI)  ARMS COMPLAINT NO:

**AIRS ID#:** 7775169 **DATE:** 9/9/10 **ARRIVE:** 2:00 PM **DEPART:** 2:30 PM

**FACILITY NAME:** SUNBELT CRUSHING - PLANT #1

**FACILITY LOCATION:** JSF 33rd Taxiway  
EGLIN AFB 32542

**OWNER/AUTHORIZED REPRESENTATIVE:** R HOLLISTER **PHONE:** (251)479-4452  
**Email:** **Mobile:**

**CONTACT NAME:** EDWARD MCLEOD **PHONE:** (251)479-4452  
**Email:** **Mobile:** (251)327-2929

**ENTITLEMENT PERIOD:** 10/21/2007 / 10/21/2012  
(effective date) (end date)

**PART I: INSPECTION COMPLIANCE STATUS** (check  only one box)

IN COMPLIANCE  MINOR Non-COMPLIANCE  SIGNIFICANT Non-COMPLIANCE

**PART II-A: AIR GENERAL PERMITS – Rule 62-210.310, F.A.C.**  
 (check  appropriate box(es))

**GENERAL PROCEDURES – Confirmation of Eligibility – Rule 62-210.310(2), F.A.C.**

1. Does this facility keep records to show that it does not have the potential to emit:

a) 10 tons per year or more of any hazardous air pollutant?-----  Yes  No  N/A  
 b) 25 tons per year or more of any combination of hazardous air pollutants?-----  Yes  No  N/A  
 c) 100 tons per year or more of any other regulated air pollutants?-----  Yes  No  N/A

2. Does this facility contain:

a) any emission units or activities not covered by the applicable air general permit with the exception of units and activities that are exempt from permitting pursuant to subsection Rule 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.?;-----  Yes  No  N/A  
 b) any emission units or activities authorized by another air general permit where such other air general permit and the air general permit of interest specifically allow the use of one another at the same facility?-----  Yes  No  N/A

**GENERAL PROCEDURES – Initial Registration/Re-registration – Rule 62-210.310(2)(b), F.A.C.**

1. Has the owner or operator of this facility completed and submitted the proper registration form to the Department for the specific air general permit to be used?;-----  Yes  No  N/A  
 2. Does this facility have a current valid air general permit (entitlement to operate)?;-----  Yes  No  N/A

**PART II-A: AIR GENERAL PERMITS – Rule 62-210.310, F.A.C., Cont.**  
 (check  appropriate box(es))

3. Has there been a change of ownership of all or part of the facility?;-----  Yes  No  N/A  
 4. Have there been any new administrative, construction, modification, or equipment changes that require a re-registration?-----  Yes  No  N/A

**GENERAL CONDITIONS – Rule 62-210.310(3), F.A.C.**

1. Does the air general permit registration form contain all current information regarding the facility?;-----  Yes  No  N/A
2. Has the owner or operator allowed the circumvention of any air pollution control device, or allowed the emission of air pollutants without the proper operation of all applicable air pollution control devices?;-----  Yes  No  N/A
3. Does the owner or operator:
  - a) maintain the authorized facility in good condition?;-----  Yes  No  N/A
  - b) ensure that the facility maintains its eligibility to use the air general permit and complies with all terms and conditions of the air general permit?;-----  Yes  No  N/A
4. Has the owner or operator allowed you, as the duly authorized representative of the Department, access to the facility at reasonable times to inspect and test and to determine compliance with the air general permit and Department rules?-----  Yes  No  N/A

**PART II-B: DETERMINATION OF FACILITY TYPE/APPLICABILITY**

(check  only **one** box)

- FOR FACILITIES SUBJECT TO:** (40 CFR Part 60, Subpart OOO, §60.670(a)(1))  
 (If you have checked  this category, answer **all** questions **INCLUDING** those with \*\*.)

**Subject Facilities:** (applicable fixed or portable facilities include each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station, crushers & grinding mills at hot mix asphalt facilities that reduce the size of non-metallc minerals embedded in recycled asphalt pavement & subsequent affected facilities up to, but not including the first storage silo or bin.)

- FOR FACILITIES NOT SUBJECT TO:** (40 CFR Part 60, Subpart OOO, §60.670(a)(2), (b), (c), and (d))  
 (If you have checked  this category, answer **all** questions **EXCEPT** those with \*\*.)

**Non-Subject Facilities:** (includes all facilities in underground mines; stand-alone screening operations at plants w/o crushers or grinding mills; facilities subject to subparts F (Portland Cement Plants) or I (Hot Mix Asphalt Facilities) of this part; fixed sand & gravel plants, & crushed stone plants w/capacities of 23 megagrams/hr (25 tons/hr) or less; portable sand & gravel plants, & crushed stone plants w/capacities of 136 megagrams/hr (150 tons/hr) or less; common clay plants, and pumice plants w/capacities of 9 megagrams/hr (10 tons/hr) or less.)

**PART III: EMISSION STANDARDS – Chapter 62-210.310(5)(e), F.A.C.**

(check  appropriate box(es))

**Stack Emissions - 40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.**

- \*\*1. Were visible stack emissions tests conducted during this site visit according to EPA Method 9 (40 CFR 60, Appendix A)?-----  Yes  No
- \*\*2. Do stack emissions from any crusher, grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station or any other affected emission point:
- \*\*a) exceed **7%** percent opacity?-----  Yes  No
- \*\*b) exceed the particulate matter standard of **0.05 grams** per dry standard cubic meter (g/dscm)?-----  Yes  No

**PART III: EMISSION STANDARDS – Chapter 62-210.310(5)(e), F.A.C., Cont.**

(check  appropriate box(es))

- \*\*3. Do stack emissions from any baghouse that controls emissions from only an individual, enclosed storage bin exceed **7%** percent opacity?-----  Yes  No

**Visible Emissions - 40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.**

- \*\*1. Were visible emissions tests conducted during this site visit according to EPA Method 9 (40 CFR 60, Appendix A)?-----  Yes  No

\*\*2. Do visible emissions from any:

- \*\*a) grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station or any other affected emission point exceed **10%** percent opacity?-----  Yes  No

- \*\*b) crusher without a capture system, exceed **15 %** opacity?-----  Yes  No

3. Pursuant to subparagraph 62-296.320(4)(b)1., F.A.C., are visible emissions from any crusher, grinding, screening operation, bucket elevator, transfer points on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station, or any other emission point **NOT** subject to 40 CFR Part 60, Subpart OOO, equal to or greater than **20%** percent opacity?-----  Yes  No

**Emission Points Enclosed in Buildings - 40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.**

- \*\*4. Is any crusher, grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station, or any other affected emission point enclosed in a building? (*If answer to question #4 is **YES**, then proceed to #4.a.*)-----  Yes  No

- \*\*a) If enclosed in a building are the stack emissions discharged from a wet scrubbing control device? (*If answer to this question is **NO**, then proceed to the next question #4.b)1) & 2). If **YES** skip to #4.c.*)----  Yes  No

- \*\*b) If the stack emissions from enclosed emission points are not discharged from a wet scrubbing control device is:  
1) the particulate matter in excess of **0.05 grams** per dry standard cubic meter (g/dscm)?-----  Yes  No  
2) the opacity greater than **7%** percent?-----  Yes  No

- \*\*c) Do the stack emissions from the baghouse(s) inside of the building(s) exceed **7%** percent opacity?  Yes  No

\*\*5. Do visible emissions from any:

- \*\*a) grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station or any other affected emission point exceed **10%** percent opacity?-----  Yes  No

- \*\*b) crusher without a capture system, exceed **15 %** opacity?-----  Yes  No

**Wet Screening/Wet Mining Operations:**

- \*\*6. Are there any visible emissions discharges at the wet screening operations and subsequent screening operations, bucket elevators and belt conveyors that process saturated material in the production line up to the next crusher, grinding mill, or storage bin?-----  Yes  No

- \*\*7. Are there any visible emissions discharges at the screening operations, bucket elevators, and belt conveyors in the production line downstream of wet mining operations, where such screening operations, bucket elevators, and belt conveyors process saturated materials up to the first crusher, grinding mill, or storage bin in the production line?-----  Yes  No

**PART IV: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310, F.A.C.**

(check  appropriate box(es))

**Compliance Demonstration** – (Rule 62-210.310(5)(e)3., F.A.C.)

1. Is each affected emission point tested according to the visible emissions and stack emissions standards as part of the annual compliance demonstration? (Rule 62-210.310(5)(e)3.e., F.A.C.)-----  Yes  No

**Compliance New Facilities** – (Rule 62-210.310(5)(e)3., F.A.C.)

2. Did this facility demonstrate initial compliance no later than 30 days after beginning operation?-----  Yes  No

**Compliance Existing Facilities** – (Rule 62-210.310(5)(e)3., F.A.C.)

3. In order to demonstrate annual compliance, was an annual visible emissions test conducted within 365 days (annually thereafter) of the previous visible emissions compliance test?-----  Yes  No

**Test Methods and Procedures** – Chapter 62-297, F.A.C., 40 CFR 60.675, and 40 CFR Part 60, Appendix A adopted and incorporated by reference at Rule 62-204.800, F.A.C.

4. Were all referenced visible emissions tests conducted using EPA Method 9?-----  Yes  No  
5. Were all referenced unconfined or fugitive emissions tests conducted using EPA Method 22?-----  Yes  No  
6. Were all referenced stack emissions or particulate matter tests conducted using EPA Methods 5 or 17?---  Yes  No

**Reporting and Recordkeeping** – (Rule 62-210.310(5)(e)3., F.A.C. ) [Chapter 62-297, F.A.C. and 40 CFR Part 60.670 – 60.676, Subpart OOO, adopted and incorporated by reference at Rule 62-204.800, F.A.C.]

**Facility and/or Equipment Replacement**

- \*\*7. Did the owner or operator submit to the Administrator, the following information about the replacement of existing facility and/or equipment:
- \*\*a) for a Crusher, Grinding Mill, Bucket Elevator, Bagging Operation, or enclosed truck, or Railcar Loading Station,  
\*\*1) the rated capacity in megagrams or tons per hour of the existing facility being replaced and the rated capacity in tons per hour of the replacement equipment?-----  Yes  No
- \*\*b) for a Screening Operation,  
\*\*1) the total surface area of the top screen of the existing screening operation being replaced and the total surface area of the top screen of the replacement screening operation?-----  Yes  No
- \*\*c) for a Conveyor Belt,  
\*\*1) the width of the existing belt being replaced and the width of the replacement conveyor belt?-----  Yes  No
- \*\*d) for a Storage Bin,  
\*\*1) the rated capacity in megagrams or tons of the existing storage bin being replaced and the rated capacity in megagrams or tons of replacement storage bins?-----  Yes  No

**Performance/Compliance Testing**

- \*\*8. During the initial performance test, did the owner or operator record the measurements of both the change in pressure of the gas stream across the scrubber and the scrubbing liquid flow rate?-----  Yes  No
- \*\*9. After the initial performance test of a wet scrubber, did the owner or operator submit semiannual reports to the Administrator of occurrences when the measurements of the scrubber pressure loss (or gain) and liquid flow rate differ by more than  $\pm 30$  percent from the averaged determined during the most recent performance test?-----  Yes  No
- \*\*a) Were the reports postmarked within 30 days following the end of the second and fourth calendar quarters?-----  Yes  No

**PART IV: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310, F.A.C. (Continued)**

(check  appropriate box(es))

- \*\*10. Did the owner or operator of the facility submit written reports of the results of all performance tests conducted to demonstrate compliance with the particulate matter standards (40 CFR Part 60.672), opacity (using EPA Method 9 to demonstrate compliance with 40 CFR Part 60.672(b), (c), and (f)), and emission observations of transfer points enclosed in buildings (using EPA Method 22 to demonstrate compliance with 40 CFR Part 60.672(e))?-----  Yes  No

**Process Changes**

- \*\*11. Does this facility have a screening operation, bucket elevator, and/or a belt conveyor system? (*If your answer to this question is **YES**, then answer either a)1) or a)2) below.*)-----  Yes  No
- \*\*a) Did this screening operation, bucket elevator, and/or belt conveyor system:
- \*\*1) originally process saturated material and switch to unsaturated material? (*Note: The unsaturated material handling processes would now be subject to the **10% opacity limit** in 40 CFR 60.672(b) and the emission test requirements of 40 CFR 60.11 and Subpart OOO.*)-----  Yes  No
- \*\*2) originally process unsaturated material and switch to saturated material? (*Note: The saturated material handling processes would now be subject to the **no visible emission limit** in 40 CFR 60.672(h.) (If answer to 1) or 2) above is **YES** then proceed to question b) below.*)-----  Yes  No
- \*\*b) Did the owner or operator submit a report of the process change within thirty (30) days following the change?-----  Yes  No

**Notification Requirements**

- \*\*12. Was notification of the actual date of startup for each affected or combination of affected facilities submitted to the Administrator and postmarked within 15 days after such date?-----  Yes  No
- \*\*a) Did the notification include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available?-----  Yes  No
- \*\*b) For portable aggregate processing plants, did the notification of actual date of initial start up also include both the home office and the current address or location of the portable plant?-----  Yes  No

**PART V: OPERATING REQUIREMENTS/CONTROL TECHNOLOGY – Rule 62-210.310, F.A.C.**

(check  appropriate box(es))

1. Is this facility a: 1) relocatable; 2) stationary; or does it have: 3) both, stationary and relocatable concrete batching and/or nonmetallic mineral processing plants? (*Please check **R** only one box above.*)  
(*NOTE: If you have checked the box for relocatable go to questions 1.a) & 1.b). If you have checked the box for stationary go to question 1.c). If you have checked box #3, both, stationary and relocatable then answer all relocatable and stationary questions 1.a), 1.b), & 1.c) below, respectively.*)
- a) If this is a **relocatable facility** was the Department notified by phone prior to this relocation, and was a Facility Relocation Notification form submitted within 1 business day following the relocation?-----  Yes  No
- b) If this is a **relocatable facility**, is it located at a mine and/or quarry, and processing only material from onsite deposits? (*If your answer to this question is **NO**, please proceed to question 1) below.*)-----  Yes  No
- 1) Does the owner or operator of this relocatable facility have a water suppression system with spray bars located at the feeder(s), the entrance, and the exit of the crusher(s), the classifier screens and the conveyor drop points?-----  Yes  No
- c) If this is a **stationary facility**, does the owner or operator of this stationary facility have a water suppression system with spray bars located at the feeder(s), the entrance, and the exit of the crusher(s), the classifier screens and the conveyor drop points?-----  Yes  No

**PART V: OPERATING REQUIREMENTS/CONTROL TECHNOLOGY – Rule 62-210.310, F.A.C. (Continued)**

(check  appropriate box(es))

- \*\*2. Does this facility incorporate the use of a wet scrubber to control emissions? (40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.) *(If your answer to this question is YES, then proceed to questions 2.a) and 2.b), below.)*-----  Yes  No
- \*\*a) Does the wet scrubber have continuous monitoring systems (CMS) for:
- \*\*1) the measurement of the pressure loss of the gas stream through the scrubber?-----  Yes  No
- \*\*2) the measurement of the scrubbing liquid flow rate to the wet scrubber?-----  Yes  No
- \*\*b) Has each CMS been certified by the manufacturer and calibrated annually in accordance with the manufacturer's instructions and to the tolerances below?-----  Yes  No
- \*\*1) ±250 pascals ±1 inch water guage pressure for measuring pressure losses of the gas stream?-----  Yes  No
- \*\*2) ±5 percent of design scrubbing liquid flow rate?-----  Yes  No

**PART VI: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(5)(b), F.A.C.**

(check  appropriate box(es))

1. Is this facility: 1) a stationary ; 2) a relocatable ; or does it have: 3) both, stationary and relocatable   
*(Please check  only one box.)*
2. For any combination of stationary or relocatable nonmetallic mineral processing plants, located with stationary or relocatable concreted batching plants:
- a) Are there any additional nonexempt units located at this facility?-----  Yes  No
- b) Is the total combined annual facility-wide fuel usage of all plants less than or equal to:
- 1) 275,000 gallons of diesel fuel-----  Yes  No
- 2) 23,000 gallons of gasoline-----  Yes  No
- 3) 44 million standard cubic feet on natural gas-----  Yes  No
- 4) 1.3 million gallons of propane-----  Yes  No
- 5) or an equivalent prorated amount if multiple fuels are used onsite-----  Yes  No
3. Does the owner/operator of the nonmetallic mineral processing plant submitting this registration maintain a log book or books to account for fuel consumption on a monthly basis?-----  Yes  No
4. Is this relocatable nonmetallic mineral processing plant used to perform a routine function of a facility *(not a Title V source)* subject to regular air permitting, such as crushing recycled asphalt (rap) at an asphalt plant?-----  Yes  No
- a) If YES, does the regularly permitted facility air construction or air operation permit(s) provide for the operation of the nonmetallic mineral processing plant as an emission unit?-----  Yes  No
5. Is this relocatable nonmetallic mineral processing plant used to perform a non-routine activity, such as destruction of a building, at a regularly permitted facility *(not a Title V source)*?-----  Yes  No
- a) If YES, does it operate under the authority of its air general permit?-----  Yes  No

**PART VII: REASONABLE PRECAUTIONS/EMISSION CONTROL MEASURES & TECHNOLOGY – Rule 62-210.310(5)(e)3.c., F.A.C.**

(check  appropriate box(es))

**Unconfined Emissions – (Rule 62-296.320(4)(c), F.A.C.)**

1. Does the owner /operator of the nonmetallic mineral processing plant take reasonable precautions to control unconfined emissions by:
  - a) use of a water suppression system with spray bars located at the feeder(s), the entrance and exit of the crusher(s), the classifier screens, and the conveyor drop points?-----  Yes  No
  - b) management of roads, parking areas, stock piles, and yards, which shall include one or more of the following:
    - 1) paving and maintenance of roads, parking areas, stock piles, and yards?-----  Yes  No
    - 2) application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions?-----  Yes  No
    - 3) removal of particulate matter from roads and other paved areas under control of the owner/operator to re-entrainment, and from building or work areas to reduce airborne particulate matter?-----  Yes  No
    - 4) reduction of stock pile height, or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles?-----  Yes  No
    - 5) landscaping and/or the planting of vegetation?-----  Yes  No
    - 6) the use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter?-----  Yes  No
    - 7) the enclosure or covering of conveyor systems?-----  Yes  No

**PART VIII: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.310(2), F.A.C.**

**A. New or Modified Process Equipment**

1. Since the last inspection has there been
  - a) installation of any new process equipment?-----  Yes  No
  - b) alteration of existing process equipment without replacement?-----  Yes  No
  - c) replacement of existing equipment substantially different than that noted on the most recent notification form?-----  Yes  No
  - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, F.A.C.) to the appropriate DEP or local program office?-----  Yes  No

Carol Melton

9/9/10

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** The design capacity of this crusher is >150 tons per hour, and is regulated by 40CFR60, subpart OOO. During this unannounced inspection, the rock crusher was found on the Eglin site next to a runway, and was operating. A water source was being used to control fugitive emissions. I met Mr. Ed McLeod, the owner/authorized representative or responsible official for Sunbelt, at the site and reminded him of the annual requirement to conduct a visible emissions test. Our records indicate that for most of the past 12 months the crusher has been located out of the State of Florida. The crusher was relocated to Eglin Air Force Base, a Title V facility, on September 9, 2010. Since Eglin Air Force Base has the potential to emit 100 tons per year or more of any other regulated air pollutant, Sunbelt appears to be in violation of Rule 62-210.310(2)(a)1, F.A.C. This Rule provides that: "The facility shall not emit nor have the potential to emit ten (10) tons per year or more of any hazardous air pollutant, twenty-five (25) tons per year or more of any combination of hazardous air pollutants, or one hundred (100) tons per year or more of any other regulated air pollutant; be collocated with, or relocated to, such a facility; or create such a facility in combination with any other collocated facilities, emissions units, or pollutant-emitting activities, including any such facility, emissions unit, or activity that is otherwise exempt from air permitting." On September 14, 2010, Ed McLeod was telephoned and notified of the concern. Mr. McLeod indicated he would stop operation of the crusher and would contact his client associated with the Air Force Base to discuss the matter. On September 15, 2010 we received a "Facility Relocation Notification" for this facility 7775169 to move to a site in Fort Walton Beach. The relocation notification also indicated the crusher shutdown on the day they were notified that operating on Eglin Air Force Base was in violation of the eligibility for their general permit. Given the quick response to our concern, compliance without enforcement is within reason.