



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 29, 2009

BY ELECTRONIC MAIL
twyoung@coxpools.com

Mr. Tom Young
Redbay Sand Company, Incorporated
Redbay Sand Mine
501 Sand Plant Road
Ponce de Loen, Florida 32455

Dear Mr. Young:

On July 29, 2009 a Department representative with the Air Resource Management Program inspected your facility, ID 7774825. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Chris Stoll at 850/595-8300, extension 1229 or christopher.stoll@dep.state.fl.us.

Sincerely,

A handwritten signature in cursive script that reads 'Erica Mitchell'.

Erica Mitchell
Air Compliance Supervisor

EM/cs/c

Enclosure



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 7774825 **DATE:** 7/29/09 **ARRIVE:** 2:16 PM **DEPART:** 2:42 PM
FACILITY NAME: REDBAY SAND MINE
FACILITY LOCATION: 501 SAND PLANT RD
 PONCE DE LEON 32455
OWNER/AUTHORIZED REPRESENTATIVE: TOM YOUNG **PHONE:** (850)381-0480
CONTACT NAME: Tom Young **PHONE:** (381)048-0
ENTITLEMENT PERIOD: 10/19/2008 / 10/19/2013
 (effective date) (end date)

PART I: INSPECTION COMPLIANCE STATUS (check only one box)
 IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C.
 (check appropriate box(es))

Stack Emissions

1. Were visible emissions tests conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
2. Are emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment controlled to the extent necessary to limit visible emissions to 5 percent opacity?----- Yes No
3. During visible emissions tests of the silo dust collector exhaust points was the loading of the silo conducted at a rate that is representative of the normal silo loading rate, or at least at the minimum 25 tons per hour rate, unless such rate is unachievable in practice?----- Yes No
4. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? (If answer to this question is “Yes”, then continue on to questions 4.a) and 4.b) below. If answer is “No” then skip 4.a) and 4.b) and continue on to question 5.)----- Yes No
 - a) Was the batching operation in operation during the visible emissions test?----- Yes No
 - b) During the visible emissions test, was the batching rate representative of the normal batching rate and duration?----- Yes No
5. If emissions from the weigh hopper (batcher) operation are controlled by a dust collector, which is separate from the silo dust collector, are the visible emissions tests of the weigh hopper (batcher) dust collector conducted while batching at a rate that is representative of the normal batching rate and duration?----- Yes No

PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C. – (continued)

(check appropriate box(es))

Compliance Demonstration - (Rule 62-296.401(5)(i), F.A.C.)

1. Is each dust collector exhaust point tested according to the visible emissions limiting standard as part of the annual compliance demonstration? (Rule 62-297.310(7)(a), F.A.C.)----- Yes No

New Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)

2. Did this facility demonstrate:
- a) initial compliance no later than 30 days after beginning operation?----- Yes No
- b) annual compliance within 60 days prior to each anniversary of the air general permit notification form submittal date?----- Yes No

Existing Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)

3. In order to demonstrate annual compliance, was an annual visible emissions test conducted 60 days prior to the AGP Notification form submission, and within 60 days prior to each anniversary date?----- Yes No

Test Reports – (Rules 62-213.440, F.A.C. and 62-297.310(8)(b), F.A.C.)

4. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed?----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.300(4)(c)2., 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 concrete batching and/or nonmetallic mineral processing plants? (*Please check only one box.*)
2. If this is a stationary concrete batching plant, is there one or more relocatable nonmetallic mineral processing plants using individual air general permits at the same location? (*If your answer to this question is YES, then proceed to questions 2.a), thru 2.d), below.*)----- Yes No
- a) Are there any additional nonexempt units located at this facility?----- Yes No
- b) Is the total combined annual facility-wide fuel oil usage of all plants less than 240,000 gallons per calendar year?----- Yes No
- c) Is the quantity of material processed less than ten million tons per calendar year?----- Yes No
- d) Is the fuel oil sulfur content 0.5% by weight or less?----- Yes No
3. Does the owner/operator of the concrete batching plant maintain a log book or books to account for:
- a) fuel consumption on a monthly basis?----- Yes No
- b) material processed on a monthly basis?----- Yes No
- c) the sulfur content of the fuel being burned (Fuel supplier certifications)?----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414(2)(a) and (b), F.A.C. (continued)

(check appropriate box(es))

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

1. Does the owner /operator of the concrete batching plant take reasonable precautions to control unconfined emissions by:
- a) 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
- b) use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck?----- Yes No

PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300(4)(d)4., 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) alterations to 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, FAC) to the appropriate DEP or local program office?----- Yes No

Chris Stoll

7/29/09

Inspector's Name (Please Print)

Date of Inspection

July 2010

/s/

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: On July 29, 2009, a Department representative conducted an unannounced compliance inspection at the Redbay Sand Company located in Walton County.

The emissions unit consists of a single dry cement storage silo.

Emissions from the silo are controlled by an Air Max Dust Collector.

At the time of the inspection, cement was being transferred from a cement tanker truck to the storage silo. No visible emissions were observed during the transfer.

The initial visible emissions test was conducted on September 17, 2009.

Proper notification was received by the Department and the results of the test were submitted to the Department the same day as the test. Results of the test indicate 0% opacity.

The majority of the site is sand and dirt, so unconfined emissions from roads and parking areas could become a compliance issue. During dry and windy weather conditions, reasonable precautions may be necessary to control unconfined emissions from the site. Florida Administrative Code 62-296.320, the General Pollutant Emission Limiting Standards, Paragraph (4)(c), regarding Unconfined Emissions of Particulate Matter, states that:

1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
2. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
3. Reasonable precautions include 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 activities.
 - d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - e. Landscaping or planting of vegetation.

Sections of the above Compliance Inspection Checklist which are not applicable to this cement storage silo include:

●Part II Stack Emissions question 4 and 5 : The storage silo does not have a weigh hopper.

●Part III Operating/Recordkeeping Requirements question 3 (a) and (c): Fuel consumption and sulfur content of fuel being burned do not apply to this emission unit because it operates on electricity.