

## Florida Department of Environmental Protection

Northwest District Branch Office 630-3 Capital Circle NE Tallahassee, Florida 32301 Charlie Crist Governor

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

July 22, 2009

SENT VIA EMAIL jshuler@cwrcontracting.com

Charles W. Roberts, President C.W. Roberts Contracting, Inc. Post Office Box 188 Hosford, Florida 32334

Dear Mr. Roberts:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is **7775581**. Your permit **expires on March 29, 2014**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the facility inspection results, the Tallahassee Branch Office reported a status of In-Compliance for your facility. Note that your facility compliance status may be subject to further review by the District Program Office.

The assistance you provided is appreciated. You are encouraged to review the enclosed inspection checklist and its comments section. If you have any questions, your local contact is Tracy White at (850) 488-3704 or tracy.a.white@dep.state.fl.us.

Sincerely,

Marlane Castellanos

Branch Manager

MC/tw Enclosures

cc: Rick Bradburn, FDEP

Maclane Castellanon

Erica Mitchell, FDEP Mary Beth Curle, FDEP



## $\frac{\text{NON-METALLIC MINERAL PROCESSING}}{\text{PLANTS}}$



## COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE:	ANNUAL (INS1, INS2)	COMPLAINT/D	OISCOVERY (CI)	
	RE-INSPECTION (FUI)	ARMS COMPL	AINT NO:	
AIRS ID#: 7775581 DAT	ΓΕ: <u>7/14/2009</u>	ARRIVE:	DEPART: _	
FACILITY NAME: QUI	INCY-CRUSHER #3			
FACILITY LOCATION	: 9918 PAT THOMA	AS PKWY		
	QUINCY 32351-	0211		
OWNER/AUTHORIZEI	REPRESENTATIVE:	CHARLES ROBERTS	<b>PHONE:</b> (850)835-5060	)
CONTACT NAME:			PHONE:	
ENTITLEMENT PERIC	<b>DD:</b> 3/29/2009 / 3/29/ (effective date) (end date)			
PART I: INSPECTION	<u></u>			
☐ IN COMPLIANC	CE MINOR Non-C	OMPLIANCE SIC	GNIFICANT Non-COMPLI	ANCE
PART II-A: AIR GENER	<u> </u>	2-210.310, F.A.C.		
(check <b>R</b> appropriate		PER-21-21-4 D1 . C2 210	210(2) E A C	
1.Does this facility ke	<u>PURES – Confirmation of</u> ep records to show that it d r or more of any hazardous	loes not have the potential		☐ Yes ☐ No ⊠ N/A
			ants?	
		gulated air pollutants?	[	Yes No No N/A
2. Does this facility c		11 4 11 1	1 2 21 1	
of units and act	ivities that are exempt from	n permitting pursuant to su	eral permit with the exception Rule 62-210.300(3	3), F.A. <u>C.</u> ,
general permit	nits or activities authorized and the air general permit of lility?	of interest specifically allow	w the use of one another	☐ Yes ☐ No ⊠ N/A
GENERAL PROCED	<u> DURES – Initial Registrat</u>	ion/Re-registration – Rul	e 62-210.310(2)(b), F.A.C.	
			oroper registration form to the contract of th	
2. Does this facility h	nave a current valid air gene	eral permit (entitlement to	operate)?;	Yes No N/A
	NERAL PERMITS – Ru	le 62-210.310, F.A.C., Co	nt.	
(check <b>R</b> appropriate 3. Has there been a cl		or part of the facility?·	[	Yes ⊠ No □ N/A
		_	equipment changes that req	
			[	

	NERAL CONDITIONS – Rule 62-210.310(3), F.A.C.  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 allow the emission of air pollutants without the proper operation of all applicable air pollution control devices?;	red
3.	Does the owner or operator: a) maintain the authorized facility in good condition?;	
	b) ensure that the facility maintains its eligibility to use the air general permit and complies with 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, at to the facility at reasonable times to inspect and test and to determine compliance with the air gen permit and Department rules?	eral
DART	II-B: <u>DETERMINATION OF FACILITY TYPE/APPLICABILITY</u>	
	neck $\mathbf{R}$ only <u>one</u> box)	
<b>∑ F</b> (	DR FACILTIES SUBJECT TO: (40 CFR Part 60, Subpart OOO, §60.670(a)(1))	
(If	you have checked $R$ this category, answer <u>all</u> questions <u>INCLUDING</u> those with **.)	
ele hot mi	<b>bject Facilities:</b> (applicable fixed or portable facilities include each crusher, grinding mill, strator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station, cx asphalt facilities that reduce the size of non-mettalic minerals embedded in recycled asphalt facilities up to, but not including the first storage silo or bin.)	rushers & grinding mills at
	PR FACILITIES NOT SUBJECT TO: (40 CFR Part 60, Subpart OOO, §60.670(a)(2), (b), (c), a you have checked R this category, answer all questions EXCEPT those with **.)	and (d))
gri sai plants,	on-Subject Facilities: (includes all facilities in underground mines; stand-alone screening operation and mills; facilities not subject to subparts F (Portland Cement Plants) or I (Hot Mix Asphalt Fand & gravel plants, & crushed stone plants w/capacities of 23 megagrams/hr (25 tons/hr) or less; proceed & crushed stone plants w/capacities of 136 megagrams/hr (150 tons/hr) or less; common clay placed plants of 9 megagrams/hr (10 tons/hr) or less.)	cilities) of this part; <u>fixed</u> ortable sand & gravel
	III: EMISSION STANDARDS – Chapter 62-210.310(5)(e), F.A.C. check <b>R</b> appropriate box(es))	
Stac	k Emissions - 40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A. Were visible stack emissions tests conducted during this site visit according to EPA Method 9 (40)	) CFR 60,
	Appendix A)?	<del>_</del>
**2.	Do stack emissions from any crusher, grinding mill, screening operation, bucket elevator, transfer belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station or any of affected emission point:	ner
	**a) exceed 7% percent opacity?	
	**b) exceed the particulate matter standard of $\underline{0.05}$ grams per dry standard cubic meter (g/dscm	)? ☐ Yes ⊠ No

PART III: <u>EMISSION STANDARDS</u> – Chapter 62-210.310(5)(e), F.A.C., Cont. (check <b>R</b> appropriate box(es))
**3. Do stack emissions from any baghouse that controls emissions from only an individual, enclosed storage bin exceed 7% percent opacity?
<u>Visible Emissions</u> - 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)?
**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?
**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?
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? ( <i>If answer to question #4 is YES</i> , then proceed to #4.a))
**a) If enclosed in a building are the stack emissions discharged from a wet scrubbing control device? ( <i>If</i> answer to this question is <u>NO</u> , then proceed to the next question #4.b)1) & 2). If <u>YES</u> skip to #4.c).)  \[ \subseteq \text{Yes} \subseteq \text{No} \]
**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 <b>0.05 grams</b> per dry standard cubic meter (g/dscm)?
2) the opacity greater than $\underline{7}\%$ percent? $\square$ Yes $\square$ No
**c) Do the stack emissions from the baghouse(s) inside of the building(s) exceed $\underline{7}\%$ percent opacity? $\square$ Yes $\square$ 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?
**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?
**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?

PART IV: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310, F.A.C.
(check $\mathbf{R}$ 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.)
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
<u>Test Methods and Procedures</u> – 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?
**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?
**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?
**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 ±30 percent from the averaged determined during the most recent performance test?
**a) Were the reports postmarked within 30 days following the end of the second and fourth calendar quarters?

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PART IV: <u>TESTING/RECORDKEEPING REQUIREMENTS</u> – Rule 62-210.310, F.A.C. (Continued) (check <b>R</b> 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 value of the part 60.672(e))?	vith
Process Changes	
**11. Does this facility have a screening operation, bucket elevator, and/or a belt conveyor system? ( <i>If your answer to this question is YES, then answer either a)1) or a)2) below.</i> )	⊠ 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 <u>YES</u> 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 R 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 stationary go to question 1.c). If you have checked box #3, both, stationary and relocatable then answer 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?————————————————————————————————————	te box for rall  Yes No onsite
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 $\mathbf{R}$ 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.)
**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? $\square$ Yes $\square$ No
**2) the measurement of the scrubbing liquid flow rate to the wet scrubber?
**b) Has each CMS been certified by the manufacturer and calibrated annually in accordance with the manufacturer's instructions and to the tolerances below?
**1) ±250 pascals ±1 inch water guage pressure for measuring pressure losses of the gas stream?
**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 $\mathbf{R}$ appropriate box(es))
1. Is this facility: 1) a stationary □; 2) a relocatable □; or does it have: 3) both, stationary and relocatable ⊠
(Please check R 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
2) 23,000 gallons of gasoline
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
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 <u>routine function</u> of a facility (not a Title V source) subject to regular air permitting, such as crushing recycled asphalt (rap) at an applied plant?
(not a Title V source) subject to regular air permitting, such as crushing recycled asphalt (rap) at an asphalt plant?
(not a Title V source) subject to regular air permitting, such as crushing recycled asphalt (rap) at an asphalt plant?
(not a Title V source) subject to regular air permitting, such as crushing recycled asphalt (rap) at an asphalt plant?
(not a Title V source) subject to regular air permitting, such as crushing recycled asphalt (rap) at an asphalt plant?

	N CONTROL MEASURES & TECHNOLOGY – Rule 62-
210.310(5)(e)3.c., F.A.C. (check <b>R</b> appropriate box(es))	
Unconfined Emissions – (Rule 62-296.320(4)(c), F.A.C.)	
<ol> <li>Does the owner /operator of the nonmetallic mineral pemissions by:         <ul> <li>a) use of a water suppression system with spray bars crusher(s), the classifier screens, and the conveye</li> <li>b) management of roads, parking areas, stock piles,</li> </ul> </li> </ol>	rs located at the feeder(s), the entrance and exit of the or drop points? Yes No and yards, which shall include one or more of the following:
2) application of water or environmentally safe of emissions?	eas, stock piles, and yards?   Yes   No dust-suppressant chemicals when necessary to control   Yes   No
re-entrainment, and from building or work are 4) reduction of stock pile height, or installation of	other paved areas under control of the owner/operator to eas to reduce airborne particulate matter?   Yes   No of wind breaks to mitigate wind entrainment of   Yes   No
	?
6) the use of hoods, fans, filters and similar equi	
<ul><li>b) alteration of existing process equipment without</li><li>c) replacement of existing equipment substantially</li></ul>	☐ Yes ☐ No ut replacement? ☐ Yes ☐ No
A. New or Modified Process Equipment  1. Since the last inspection has there been  a) installation of any new process equipment?  b) alteration of existing process equipment without  c) replacement of existing equipment substantially recent notification form?  d) If you answered YES to any of the above, did notification form and appropriate fee (Rule 62-4.0)	
A. New or Modified Process Equipment  1. Since the last inspection has there been  a) installation of any new process equipment?  b) alteration of existing process equipment without  c) replacement of existing equipment substantially recent notification form?  d) If you answered YES to any of the above, did notification form and appropriate fee (Rule 62-4.0)	Yes ⊠ No ut replacement? ☐ Yes ⊠ No ly different than that noted on the most ☐ Yes ⊠ No the owner submit a new and complete 050, F.A.C.) to the appropriate DEP or
A. New or Modified Process Equipment  1. Since the last inspection has there been  a) installation of any new process equipment?  b) alteration of existing process equipment withou  c) replacement of existing equipment substantially recent notification form?  d) If you answered YES to any of the above, did notification form and appropriate fee (Rule 62-4.0 local program office?	Yes No ut replacement?  yes No ly different than that noted on the most  Yes No  Yes No  Yes No  Yes No  Yes No  Yes No  The owner submit a new and complete 050, F.A.C.) to the appropriate DEP or  Yes No  Yes No
A. New or Modified Process Equipment  1. Since the last inspection has there been  a) installation of any new process equipment?  b) alteration of existing process equipment without  c) replacement of existing equipment substantially recent notification form?  d) If you answered YES to any of the above, did notification form and appropriate fee (Rule 62-4.0 local program office?	Yes No ut replacement?
A. New or Modified Process Equipment  1. Since the last inspection has there been a) installation of any new process equipment? b) alteration of existing process equipment without c) replacement of existing equipment substantially recent notification form? d) If you answered YES to any of the above, did notification form and appropriate fee (Rule 62-4.0 local program office?	Yes No ut replacement?

**COMMENTS:** I met with Enine Adams, Site Operator. The new machine was in place and installed. Mr. Adams pointed out the various locations on of the spraybars on the equipment. I asked Mr. Adams if a water supply was hooked up to the spraybars. He replied that the machine "does not put out any dust." He pointed out the water supply connectors. No water supply was hooked up to the machine.

Mr. Adams further explained that the machine is mostly enclosed and that it does not emit much dust. The machine was not in operation during the inspection. Mr. Adams also mentioned that no water was used during the last compliance testing.

Note: The facility does not appear to be located at a "hot mix asphalt" facility. However, the facility processess RAP. The facility application equipment parameters has a capacity of 100 TPH listed, but also has the "Subject to CFR Subpart OOO" checked as "yes." Unless otherwise indicated by the District office, I interpret this facility as subject to Subpart OOO. Annual compliance testing appears to be required (please contact the District office to confirm-if needed).

The last compliance test was on 6/19/2009. The test review was on 7/06/2009. Annual compliance testing for 2009 was performed.

## Recommendations:

If a water suppression system (spraybar) is needed, please make sure the system is functional. If unconfined emissions occur at the equipment locations specified in the registration form, a non-compliance status may result.

If the equipment is relocated, a FDEP relocation form must be properly submitted to the Department.