



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Mimi A. Drew
Secretary

September 17, 2010

SENT VIA EMAIL

SGhazvine@Sandco.fl.com

Behzad Ghazvini
Sandco Inc.
4708 Capital Circle NW
Tallahassee, Florida 32303

Dear Mr. Ghazvini:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The program identification number for this facility is **7775625**. Your permit expires on **May 2, 2015**. The letter applies only to activities covered by the Air Resource Management Program.

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. The inspection report is enclosed. 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

Marlane Castellanos
Branch Manager

MC/tw
Enclosures

cc: Vicki Goodman, Sandco Inc. (VGoodman@Sandco.fl.com)
Rick Bradburn, FDEP
Erica Mitchell, FDEP
Mary Beth Curle, FDEP



NON-METALLIC MINERAL PROCESSING PLANTS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 7775625 **DATE:** 9/15/2010 **ARRIVE:** 1:45 **DEPART:** _____

FACILITY NAME: RUTHENIA RD SAND MINE-RELOC CRUSHER

FACILITY LOCATION: 4900 RUTHENIA RD
TALLAHASSEE 32305-5532

OWNER/AUTHORIZED REPRESENTATIVE: BEHZAD GHAZVINI **PHONE:** (850)514-1000
Email: **Mobile:**

CONTACT NAME: VICKIE GOODMAN **PHONE:** (850)514-1000
Email: **Mobile:** (850)251-8143

ENTITLEMENT PERIOD: 5/2/2010 / 5/2/2015
 (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 ±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

Tracy White

9/15/2010

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

Sandco maintenance staff were at the site and working on the equipment. A rock crusher and a screener machine were present. A few large piles of concrete debris were located in the vicinity. I observed the yard roads. Large amounts of road dust were generated from the on-site truck vehicle traffic.

I asked the staff about the rock crusher. The rock crusher was not in operation and has been down for repairs since March 2010. The unit was still being serviced and was not in operation during the site visit. Site staff indicated they would attempt to start up the crusher unit later in the day.

According to site staff, the dust suppression system uses a spray bar located at the feeder entrance. A water truck is used to supply water. According to staff, the water truck was not on-site. I recommended that the water supply be present and water used for dust suppression when the unit was in operation.

The identification plate on the crusher listed serial number 400120DLXA. According to Department computer records, the serial number listed with the registration (permit) is "S/N 1957." The serial numbers do not appear to match.

Note: At this time, I do not have a copy of the original registration (permit) application. I do not know the rated capacity of the equipment (tons/hour).

Recommendations:

- 1) Please use reasonable precautions to control unconfined emissions (dust) from vehicle traffic on roads, etc.
- 2) The dust suppression system should be used on the rock crusher when there is potential for unconfined emissions. Locations for placement of the system is located in the registration form.
- 3) The serial number information on FDEP Department permit records does not match the serial number on the crusher. According to site staff, the crusher is now property of Sandco, Inc. (originally owned by Powerscreen, Inc.) and will remain on-site. If applicable, please update the registration (permit) records for the corrected serial number, etc. The contact information for permitting is below.
- 4) If the rock crusher is subject to 40 CFR Part 60 Subpart OOO, annual compliance testing may be required.
- 5) Unconfined emissions from screening operations may also be subject to rule.

Permit contacts:

Dickson Dibble [Dickson.Dibble@dep.state.fl.us]
(850) 921-9586

Rebecca Ajhar [Rebecca.Ajhar@dep.state.fl.us]
(850) 921-9583