

**Dibble, Dickson**

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**From:** Dibble, Dickson  
**Sent:** Friday, January 07, 2011 4:02 PM  
**To:** 'Jim Erb'  
**Cc:** Ajhar, Rebecca; Grant, Patricia; 'John.Kasper@ocfl.net'; 'Ilka.Bundy@ocfl.net'; 'Jodi.Dittell@ocfl.net'  
**Subject:** RE: RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE) Air General Permit, ARMS #0951294-002 has been WITHDRAWN

Dear Mr. Erb,

Per your e-mail request below the RICE Air General Permit Registration which was submitted and received by our office on 12/17/10 has been withdrawn from the re-registration and renewal process.

Thank you for your consideration and attention in this matter.

If you have any questions, comments or concerns please e-mail or call.

Sincerely yours,

*Dickson E. Dibble*

**Dickson E. Dibble, ES III**

FL Dept of Environmental Protection  
Div. of Air Resource Management  
Bureau of Air Monitoring & Mobile Sources  
Air General Permit Program  
Tel. (850) 921-9586  
FAX (850) 922-6979  
ICG-#345

**Dickson.Dibble@dep.state.fl.us**



**Please note:** Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure

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**From:** Jim Erb [mailto:denali1011@cfl.rr.com]  
**Sent:** Thursday, January 06, 2011 2:14 PM  
**To:** Dibble, Dickson  
**Subject:** RE: Here is my e-mail address for use when requesting an Air General Permit Registration withdrawal

Good afternoon, I am requesting that the air general permit withdrawal. The reason for withdrawal is that Ilka bundy came back out and informed me that that permit wouldn't cover our process. I am working with an engineer to figure out our permit. Thank you for your help. Jim

---

**From:** Dibble, Dickson [<mailto:Dickson.Dibble@dep.state.fl.us>]

**Sent:** Wednesday, January 05, 2011 2:31 PM

**To:** [denali1011@cfl.rr.com](mailto:denali1011@cfl.rr.com)

**Cc:** Ajhar, Rebecca

**Subject:** Here is my e-mail address for use when requesting an Air General Permit Registration withdrawal

Jim,

Happy New Year and thanks for your call!

You may send your request to my e-mail address below, stating the reason for your withdrawal.

[Dickson.Dibble@dep.state.fl.us](mailto:Dickson.Dibble@dep.state.fl.us)

Have a great day!

Sincerely yours,

*Dickson E. Dibble*

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**Tracking:**

**Recipient**

'Jim Erb'

Ajhar, Rebecca

Grant, Patricia

'John.Kasper@ocfl.net'

'Ilka.Bundy@ocfl.net'

'Jodi.Dittell@ocfl.net'

**Delivery**

Delivered: 1/7/2011 4:02 PM

Delivered: 1/7/2011 4:02 PM

# Dibble, Dickson

**From:** Dibble, Dickson  
**Sent:** Friday, January 07, 2011 1:08 PM  
**To:** John.Kasper@ocfl.net  
**Cc:** Ajhar, Rebecca; 'Ilka.Bundy@ocfl.net'; Jodi.Dittell@ocfl.net; Grant, Patricia  
**Subject:** WITHDRAWN FW: E & H Car Crushing 0951294-002-AG WITHDRAWN  
**Attachments:** RE: Here is my e-mail address for use when requesting an Air General Permit Registration withdrawal; EH Car Crushing 010311.doc

John, et al.,

FYI - This is to advise you that I have been in touch with Mr. Jim Erb of E&H Car Crushing Inc, 106 Gloucester St., Orlando, FL 32833-3459, and he confirmed your findings which you had outlined in your e-mail below and the attached inspection report.

I advised him to send me a withdraw request via e-mail (see attached 01/06/11) and I would proceed with the withdrawal.

As the result, the Reciprocating Internal Combustion Engines AGP Registration Form and the associated ARMS Project #0951294-002, has been withdrawn.

FACILITY SCREEN Comments in their entirety: 01/06/11-Renewal RICE AGP Regist. proj.# 002 WITHDRAWN at request of OAR Jim Erb. CDOR told him that the AGP wouldn't cover his process as there are multiple emission sources.

**Florida Department of Environmental Protection - Enterprise Applications** ORACLE

Details Emis unit permit Compliance Pollutant related party Help Return Exit Window

Air Resource Management System - Facility

POINT	Office * <input type="text" value="CDOR"/>	City: <input type="text" value="ORANGE"/>	County * <input type="text" value="ORANGE"/>	ARRMIDV01
			AIRS ID <input type="text" value="0951294"/>	
Owner/Comp *	<input type="text" value="E&amp;H CAR CRUSHING CO INC"/>		Site <input type="text" value="E&amp;H CAR CRUSHING COMPANY"/>	
Directions	<input type="text" value="106 GLOUCESTER ST"/>			
Street	<input type="text" value="ORLANDO"/>			
City *	Zip <input type="text" value="32833"/>	<input type="text" value="3459"/>	Validate Address	
UTM Zone	<input type="text" value="17"/>	East <input type="text" value="490.52"/>	North <input type="text" value="3157.95"/>	Latitude <input type="text" value="28 32 54.0936"/>
			Longitude	<input type="text" value="81 05 48.9300"/>
Status *	<input type="text" value="A"/>	<input type="text" value="ACTIVE"/>	Maj Group SIC *	<input type="text" value="19"/>
			<input type="text" value="ELECTRIC, GAS AND SANITARY SERVICES"/>	
Reloc	<input type="text" value="II"/>	Shutown Dt <input type="text"/>	Start Dt <input type="text"/>	Final Shutown Dt <input type="text"/>
Gov Fac *	<input type="text" value="II"/>	<input type="text" value="NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR LOCAL GOVE"/>		
		HAZ Waste Generator ID: FLD <input type="text"/>		
AOR Req *	<input type="text" value="II"/>	Ozone SIP Facility * <input type="text" value="II"/>	Type <input type="text" value="2"/>	<input type="text" value="OTHER ELECTRIC PRODUCTION"/>
Compliance Tracking				Current Permit Indicator <input type="text" value="AG"/>
Title V	<input type="text" value="NON TITLE V"/>	non-HAP Class <input type="text" value="INDIOR"/>	HAP Class <input type="text" value="INDIOR"/>	Public Exempt <input type="text" value="II"/>
# of Emis Units	C <input type="text" value="0"/>	A <input type="text" value="1"/>	I <input type="text" value="0"/>	Generator Rating <input type="text" value="MW"/>
Comment	<input type="text" value="See Details Comments. 01/06/11 Renewal RICE AGP Regist. proj.# 002 WITHDRAWN at request of OAR Jim Erb. CDOR told him"/>			

Enter the FACILITY COMMENT  
Record 1/1

PERMIT-Events Screen

Florida Department of Environmental Protection - Enterprise Applications

Help Edit Window

ORACLE

Permitting Application - Events

**Events Scheduled** 10 of 30

AIRS ID: 0351234 Site Name: E&H CAR CRUSHING COMPANY

Permit #: Type/Subtype: AG / 07 Received: 12/17/2010

Project #: 002 Project Name: (E&H CAR CRUSHING COMPANY)

> Receive Request: Done

Event	Begin Date	Period	Due Date	Rmn	Status	End Date
Receive Request	12/17/2010	0	12/18/2010		Done	12/17/2010
Entitlement Review	12/17/2010	30	01/16/2011		Done	01/07/2011
Determine Agency Action	12/17/2010	30	01/16/2011		Withdrawn	01/07/2011
WITHDRAWAL APPLICATION	01/07/2011	1	01/08/2011		Withdrawn	01/07/2011
STOP CLOCK	01/07/2011	1	01/08/2011		Done	01/07/2011

Record: 1/5

I appreciate your proactive activity and input to this process. If you have any questions, comments or concerns please e-mail or call.

Thank you to all and have a Happy, Healthy, and Prosperous New Year!

Sincerely,

*Dick*

**Dickson E. Dibble, ES III**

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 Bureau of Air Monitoring & Mobile Sources  
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---

**From:** [John.Kasper@ocfl.net](mailto:John.Kasper@ocfl.net) [mailto:[John.Kasper@ocfl.net](mailto:John.Kasper@ocfl.net)]  
**Sent:** Tuesday, January 04, 2011 11:10 AM  
**To:** Dibble, Dickson  
**Cc:** [Jodi.Dittell@ocfl.net](mailto:Jodi.Dittell@ocfl.net); [Ilka.Bundy@ocfl.net](mailto:Ilka.Bundy@ocfl.net)  
**Subject:** E & H Car Crushing 0951294-001-AG

Dick:

EPD staff visited E&H yesterday to see if they were still eligible for the GP. They submitted a re-registration form to you 12/17/10 for a large diesel engine that powers a metal shredder. Our inspection report is attached.

EPD concluded that they have equipment on site that disqualifies them for a GP. The metal shredder includes a cyclone dust collector control device, and we interpret 62-210.300(1)(a) to require a construction permit for a control device. The GP they have is for a diesel engine only.

E&H told us that they don't use the dust collector because it does not work. They have it on site because it came with the shredder they purchased. If the shredder included the cyclone, it was designed to use the cyclone and the cyclone should be functioning properly. A construction/operation permit process would have caught this issue and fixed the cyclone before issuing an operation permit. A GP for the diesel engine did not catch this issue.

The shredder also includes a sifter and conveyors with drop points, so the crusher appears to be an emission unit separate from the engine. We have GPs for batch plants with control equipment, and rock crushers that include diesel engines and water sprays for PM control, but none for metal shredders that I am aware of. If the shredder is a separate emission unit (and I have no basis to conclude it is exempt), then a GP that allows only one emission unit would not work here.

EPD verbally asked Mr. Erb to withdraw the GP re-registration and submit a construction permit application, but we will leave the GP project up to you. If you have any questions, please call me or Ilka Bundy (407-836-1476).

John Kasper, P.E.  
Engineer III  
Environmental Protection Division  
Air Quality Management  
800 Mercy Drive, Suite 4  
Orlando, FL 32808  
office: 407-836-1443  
fax: 407-836-1498  
email: [john.kasper@ocfl.net](mailto:john.kasper@ocfl.net)  
web: [www.ocepd.org](http://www.ocepd.org)



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**Tracking:**



**Recipient**

John.Kasper@ocf.net

Ajhar, Rebecca

'Ilka.Bundy@ocf.net'

Jodi.Dittell@ocf.net

Grant, Patricia

**Delivery**

Delivered: 1/7/2011 1:08 PM

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## INSPECTION REPORT FORM AIR POLLUTION EMISSION SOURCES

<b>FACILITY:</b> <b>E&amp;H Car Crushing Company</b>		<b>DISTRICT:</b> <b>4</b>	<b>COUNTY:</b> <b>Orange</b>
<b>ADDRESS:</b> <b>106 Gloucester St., Orlando, FL 32833</b>		<b>CONTACT/TITLE:</b> <b>HAROLD ERB / R.O.</b> <b>JIM ERB / Facility Contact</b>	
<b>PHONE #:</b> <b>407-568-5255</b> <b>407-963-3978</b>	<b>PERMIT #:</b> <b>0951294-001-AG</b>	<b>EXPIRATION DATE:</b> <b>1/15/2011</b>	
<b>SOURCE DESCRIPTION:</b> <b>Metal Shredder with 1800 HP diesel engine, cyclone dust collector, and sifter</b>			
<b>INSPECTION DATE:</b> <b>1/3/2011</b>	<b>AUDIT TYPE:</b> <b>I</b>	<b>COMPLIANCE STATUS:</b> <b>TBD</b>	
<p>Ilka Bundy, Environmental Team Leader, and John Kasper, Permit Engineer III, met with Jim Erb on 1/3/2011 to discuss the permitting issue regarding the metal shredder operation. The facility submitted a second application to Tallahassee for a general permit for internal combustion engines on 12/17/2010. During the inspection conducted by Ilka Bundy on 3/18/2010, Ilka Bundy suggested to Mr. Erb to contact a local consultant to determine the correct permit type for this operation. When the inspectors asked Mr. Erb about his consultant, he stated that he used the same consultant from Texas that he used previously for the first general permit application.</p> <p>The inspectors verified that in addition to the diesel engine used to run the shredder, there was a cyclone dust collector and a sifter on site. Mr. Erb stated that the cyclone dust collector was disconnected and was not being used because he was not able to get it to work correctly. John Kasper told Mr. Herb that because the cyclone dust collector and sifter are on site, the facility must apply for a construction permit and an air operation permit. The inspectors suggested to Mr. Herb to contact Dick Dibble in Tallahassee to withdraw the general permit application and apply for an air construction permit.</p> <p>Pictures were taken to document the metal shredder, the sifter, and cyclone dust collector.</p>			
<b>Permit Pulled:</b> _____ <b>ARMS Checked:</b> _____ <b>Time Spent:</b> _____		<b>Entered into ARMS:</b> _____ <b>Reviewed By:</b> _____ <b>Reviewed Date:</b> _____	
<b>INSPECTOR(S) NAME(S):</b> <b>Ilka Bundy and John M. Kasper</b>			
<b>SIGNATURE(S):</b>			<b>DATE:</b>  1/3/2011



Taken By: John Kasper

Direction: East

Date: 1/3/2011

Time: 1:52 PM

Description: Metal shredder operation at E&H Car Crushing Company in Bithlo (Orlando). Operation has cyclone PM control device (blue object in front of flag pole), shredder (to right of cyclone, connected to cyclone with piping), metal sifter/screener (under roof to left of cyclone), and large diesel engine (exhaust pipe elbow is at base of cyclone and flag pole). Operation also includes conveyors with drop points, and storage piles that are hidden by the other equipment.



Taken By: John Kasper

Direction: East

Date: 1/3/2011

Time: 1:52 PM

Description: Sifter under a covered roof. Sifter is a rotating, perforated metal drum that separates shredded pieces into piles of different sizes.



Taken By: John Kasper

Direction: East

Date: 1/3/2011

Time: 1:52 PM

Description: Another view (close-up) of the cyclone dust collector and shredder enclosure. Diesel engine exhaust (black pipe with 90° elbow) is visible just to the left of the cyclone. Note conveyor in foreground.