

Enviro-Mates, Incorporated
Sand and Gravel Packaging Plant
Facility ID No.: 0330129
Escambia County

Air Operation Permit
DRAFT Permit No.: 0330129-001-AO

DEP Northwest District:
160 Governmental Center
Pensacola, FL 32501-5794
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Drafted on January 9, 1998

[electronic file name: 0330129o.doc]

Air Operation Permit
Permit No.: 0330129-001-AO

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Permittee:
Enviro-Mates, Incorporated

Permit No.: 0330129-001-AO
Facility ID No.: 0330129
SIC Nos.: 1442
Project: Air Operation Permit

This permit is for the operation of the Sand and Gravel Packaging Plant located at 1200 Old Corry Field Road, West Pensacola, Escambia County; UTM Coordinates: Zone 16, 474.64 km East and 3362.96 km North; Latitude: 30° 25' 29" North and Longitude: 87° 16' 02" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix G-1, General Conditions

Effective Date: January 12, 1998
Renewal Application Due Date: November 13, 2002
Expiration Date: January 12, 2002

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

/signed/

Ed K. Middleswart, P.E.
Air Program Administrator

EKM/as

Section I. Facility Information.

Subsection A. Facility Description.

This facility produces bagged sand and gravel for use in a specialty acid-resistant concrete, "Hortoncrete". The facility consists of sand and gravel storage piles, a gas-fired rotary kiln and a four-bag dust filter of proprietary design and construction. Sand and gravel are received by dump truck and stored in piles. The materials are dried in the rotary kiln and bagged for sale.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities such as general plant, equipment and grounds maintenance.

Based on the permit application received, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

ID No.

Brief Description

-001	Sand and Gravel Packaging Plant
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Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers

These documents are on file with permitting authority:

Operating Permit Renewal Application received December 31, 1997

Air Operating Permit AO17-223571 issued January 1, 1993

Certificate of Completion and accompanying documents received December 12, 1992

Air Construction Permit AC17-180820 issued June 8, 1990

Construction Permit Application received May 21, 1990

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [insert any required systems]
[Rule 62-296.320(1)(a), F.A.C.]
5. General Particulate Emission Limiting Standards. Unconfined Particulate Emissions Reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions include, but are not limited to, the following:
 - a. Maintenance of roads, parking areas and yards.
 - b. Application of water or other dust suppressants when necessary to control emissions from roads, yards, parking lots and stock piles.
 - c. Removal of particulate matter from roads and other paved areas under control of the owner or operator, and from buildings or work areas to prevent reentrainment.
 - d. Enclosure or covering of conveyor systems.
 - e. Posting of, and adherence to, vehicle (or truck) speed limits.
 - f. Protection of dust containers from action of the wind.
[Rules 62-296.320(4)(c) and 62-4.070, F.A.C.]
6. Neither the owner nor operator shall allow any person to circumvent any pollution control device nor allow the emissions of air pollutants without the applicable air pollution control device operating properly. [FAC Rule 62-210.650]

7. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.
[Rule 62-4.090, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office.

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
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-001	Rotary Kiln Exhaust Bag Filter - Sand and Gravel Packaging Plant
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Rotary kiln exhaust bag filter is of proprietary design and manufacture. Fifty-five gallon drums are welded end-to-end to form the ducting and fabric bags are clamped to the ends of some of the drums to form an enormous "H". The kiln exhaust air goes through a cyclone and the air flow is split into four filter bags. The air inflates the bags and the exhaust air is filtered as it passes through the bags.

The following specific conditions apply to the emissions unit(s) listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-4.160(2) and Rule 62-210.200(PTE), F.A.C.]

A.2. Maximum Allowable operating rate shall not exceed 10 Ton/hr fed to the dryer.
[Rules 62-4.160(2), 62-210.200(PTE), and 62-4.070, F.A.C., AC17-180820]

Emission Limitations and Standards

A.3. Particulate Matter (PM) emissions shall not exceed 14.97 lb/hr.
[Rules 62-4.070 and 62-296.320(4)(a)2., F.A.C., AC17-180820 application]

A.4. Visible emissions shall not exceed 5 percent opacity.
[Rules 62-4.070 and 62-297.310(7)(c), F.A.C., AC17-180820 application]

Test Methods and Procedures

A.5. PM testing is waived for the rotary dryer bag filters as allowed by Rule 62-297.310(7)(c), F.A.C., for minor sources equipped with a fabric bag filter with the substitution of a 5% Visible Emissions Standard.

A.6. Visible emissions tests shall be conducted in accordance with DEP Method 9 for thirty minutes.

[Rule 62-297.310(4)(a)2, F.A.C.]

A.7. Visible emissions tests shall be scheduled within 15 days of the facility becoming operational again and annually thereafter. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

[Rule 62-297.310(8)(b), F.A.C.]

A.8. Test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports.

A.9. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.C.. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

A.10. Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

[Rules 62-4.070, and Rule 62-297.310(2), F.A.C.]

Reasonable Assurances

A.11. Permittee has notified the Department that the plant has not been operational for over one year as of September 1997. Permittee must submit a detailed startup, operation, and maintenance plan for the idle facility at least 30 days prior to reinitiating operations. Permittee shall test for compliance with the applicable standards within 15 days of the facility again becoming operational.

[Rules 62-4.070(3), 62-297.310(7) F.A.C., letter of September 25, 1997]

A.12. Within 30 days of legal transfer of a permitted facility, an "Application for Transfer of Permit" [DEP Form 62-1.201(1)] must be submitted to the Department.

[Rule 62-4.120, F.A.C.]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
 - a. Having access to and copying any records that must be kept under the conditions of this permit;
 - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit;and,
 - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
 - the person responsible for performing the sampling or measurement;
 - the date(s) analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.