

# COLELLA & ASSOCIATES, INC.

Engineers / Scientists / Contractors Solving Environmental Issues

March 21, 2001

FDEP Central District  
 Air Compliance Department  
 3319 Maguire Boulevard, Suite 232  
 Orlando, Florida 32803-3767

RECEIVED Project No. 00-110

APR 11 2001

BUREAU OF AIR REGULATION

Administration and Specific Conditions Submittal  
Relocatable Concrete, Asphalt, and Construction Debris Crushing Facility  
Samsula Recycling, Inc.  
363 State Road 415  
New Smyrna Beach, Florida  
Air Construction Permit No. 7775112-001-AC

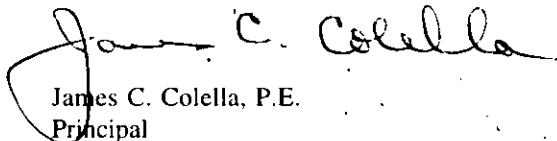
**To Whom it May Concern:**

Colella & Associates, Inc., as directed by Samsula Recycling, Inc., submits, as is required, the following information to comply with and address Administrative Conditions 7 and 15 and Specific Conditions 19 and 26 of their Air Construction Permit (No. 7775112-001-AC).

- Administrative Condition 7 & Specific Conditions 19 and 26 - Method 9 Visible Emissions Tests were performed on February 28, 2001, at 363 SR 415, New Smyrna Beach for each of the emission points (5) established in the permit (Specific Condition 3). The tests were performed with the equipment operating in the mode proposed for the crusher. Samsula Recycling, Inc., crushes various materials using screens to produce specified sized aggregate for resale. The crusher operated at approximately full capacity with its screens, 100-tons per hour, as was presented in the air construction permit application. The permitted capacity, 250-tons per hour, presented in the permit is associated with the crusher operating without screens and does not represent the actual operation of the crusher. Results are enclosed and have been transmitted to Mr. William Leffler, P. E., of Florida Department of Environmental Protection's (FDEP) Air Resources Management in the Tallahassee, Florida office.
- Administrative Condition 15
  - 15a -- Resolved pending violations/penalties with the FDEP. See attached letter.
  - 15b and c -- Trained employees associated with the crusher operation and permit conditions on March 1, 2001. See attached training documentation.
  - 15d -- Developed a corporate environmental policy (enclosed).

If there are any questions regarding the information presented herein, please contact James Colella at (386) 322-9080 or Mr. Mike Stokes at Samsula Recycling, Inc. at (386) 423-6769.

Respectfully yours,  
 COLELLA & ASSOCIATES, INC.



James C. Colella, P.E.  
 Principal

**ENCLOSURES**

cc: Mr. Michael Stokes, Samsula Recycling, Inc. (all enclosures)  
 Mr. William Leffler, P. E., FDEP Tallahassee (Method 9 Test results only)

Visible Emission Observation Form

SOURCE NAME			OBSERVATION DATE			START TIME			STOP TIME			
SAMSULA RECYCLING INC			2/28/01			8:07			8:37			
ADDRESS			SEC			SEC			SEC			
363 SR 415			MIN	0	15	30	45	MIN	0	15	30	45
CITY			STATE			ZIP			1			
NEW SMYRNA BCH			FL			32168			31			
PHONE			SOURCE ID NUMBER			2			32			
			7775112-001-AC			3			33			
PROCESS EQUIPMENT			OPERATING MODE			4			34			
Rec. HOPPER & GRIZZLY FEEDER			100 T/HR			5			35			
CONTROL EQUIPMENT			OPERATING MODE			6			36			
SPRAY NOZZLE						7			37			
DESCRIBE EMISSION POINT			8			38						
START HOPPER AT REAR OF RECYCLING SYSTEM			STOP									
HEIGHT ABOVE GROUND LEVEL			HEIGHT RELATIVE TO OBSERVER			9			39			
START 12' STOP 12'			START 6' STOP 6'			10			40			
DISTANCE FROM OBSERVER			DIRECTION FROM OBSERVER			11			41			
START 50' STOP 50'			START NW STOP NW			12			42			
DESCRIBE EMISSIONS			13			43						
START LOFTING			STOP SAME			14			44			
EMISSION COLOR			PLUME TYPE CONTINUOUS <input type="checkbox"/>			15			45			
START CLEAR STOP SAME			FUGITIVE <input type="checkbox"/> INTERMITTENT <input checked="" type="checkbox"/>			16			46			
WATER DROPLETS PRESENT:			IF WATER DROPLET PLUME			17			47			
NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			18			48			
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED			19			49						
START 1' ABOVE HOPPER			STOP SAME			20			50			
DESCRIBE BACKGROUND			21			51						
START BUILDING			STOP SAME			22			52			
BACKGROUND COLOR			SKY CONDITIONS			23			53			
START GREEN STOP SAME			START OC STOP OC			24			54			
WIND SPEED			WIND DIRECTION			25			55			
START CALM STOP 1-2			START N/A STOP SW			26			56			
AMBIENT TEMP			WET BULB TEMP			27			57			
START 68°F STOP 68°F			RH. percent			28			58			
29			59			30			60			
<p>Source Layout Sketch Draw North Arrow</p>			<p>AVERAGE OPACITY FOR HIGHEST PERIOD 0%</p> <p>NUMBER OF READINGS ABOVE HIGHEST PERIOD 0% WERE 0</p> <p>RANGE OF OPACITY READINGS 0% MINIMUM 0% MAXIMUM</p> <p>OBSERVER'S NAME (PRINT) KELLY ROBERTS</p>									
COMMENTS			OBSERVER'S SIGNATURE			DATE						
			Kelly Roberts			02/28/01						
			ORGANIZATION									
			AIR COMPLIANCE EVALUATORS									
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY			DATE						
			EASTERN TECHNICAL ASSOC.			2/14/01						
TITLE			DATE			VERIFIED BY			DATE			

Visible Emission Observation Form

SOURCE NAME			OBSERVATION DATE				START TIME				STOP TIME			
SAMSULA RECYCLING INC.			02/28/01				8:40				9:10			
ADDRESS			SEC				SEC							
363 SR 415			MIN	0	15	30	45	MIN	0	15	30	45		
CITY			1				2				3			
NEW SMYRNA BEACH			0				0				0			
STATE			3				4				5			
FL			0				0				0			
ZIP			6				7				8			
32168			0				0				0			
PHONE			9				10				11			
SOURCE ID NUMBER			12				13				14			
7775112-001-AC			0				0				0			
PROCESS EQUIPMENT			15				16				17			
CRUSHER			0				0				0			
OPERATING MODE			18				19				20			
100 T/HR			0				0				0			
CONTROL EQUIPMENT			21				22				23			
SPRAY NOZZLE			0				0				0			
OPERATING MODE			24				25				26			
DESCRIBE EMISSION POINT			27				28				29			
START ENCLOSED CRUSHER			30				31				32			
NEAR CENTER OF RECYCLING UNIT			0				0				0			
STOP			33				34				35			
HEIGHT ABOVE GROUND LEVEL			36				37				38			
START 10' STOP 10'			0				0				0			
HEIGHT RELATIVE TO OBSERVER			39				40				41			
START 4' STOP 4'			0				0				0			
DISTANCE FROM OBSERVER			42				43				44			
START 50' STOP 50'			0				0				0			
DIRECTION FROM OBSERVER			45				46				47			
START NW STOP NW			0				0				0			
DESCRIBE EMISSIONS			48				49				50			
START LIFTING			51				52				53			
STOP SAME			0				0				0			
EMISSION COLOR			54				55				56			
START CLEAR STOP SAME			0				0				0			
PLUME TYPE CONTINUOUS <input type="checkbox"/>			57				58				59			
FUGITIVE <input checked="" type="checkbox"/> INTERMITTENT <input type="checkbox"/>			0				0				0			
WATER DROPLETS PRESENT			60				61				62			
NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			0				0				0			
IF WATER DROPLET PLUME			63				64				65			
ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			0				0				0			
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED			66				67				68			
START 1' FROM ENCLOSURE			69				70				71			
STOP CRUSHER			0				0				0			
DESCRIBE BACKGROUND			72				73				74			
START BUILDING			75				76				77			
STOP BUILDING			0				0				0			
BACKGROUND COLOR			78				79				80			
START GREEN STOP SAME			0				0				0			
SKY CONDITIONS			81				82				83			
START OC STOP PC			0				0				0			
WIND SPEED			84				85				86			
START 1-2 MPH STOP SAME			0				0				0			
WIND DIRECTION			87				88				89			
START SW STOP SAME			0				0				0			
AMBIENT TEMP			90				91				92			
START 68°F STOP 71°F			0				0				0			
WET BULB TEMP			93				94				95			
RH. percent			96				97				98			
99			0				0				0			
100			0				0				0			
101			0				0				0			
102			0				0				0			
103			0				0				0			
104			0				0				0			
105			0				0				0			
106			0				0				0			
107			0				0				0			
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109			0				0				0			
110			0				0				0			
111			0				0				0			
112			0				0				0			
113			0				0				0			
114			0				0				0			
115			0				0				0			
116			0				0				0			
117			0				0				0			
118			0				0				0			
119			0				0				0			
120			0				0				0			
121			0				0				0			
122			0				0				0			
123			0				0				0			
124			0				0				0			
125			0				0				0			
126			0				0				0			
127			0				0				0			
128			0				0				0			
129			0				0				0			
130			0				0				0			
131			0				0				0			
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137			0				0				0			
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139			0				0				0			
140			0				0				0			
141			0				0				0			
142			0				0				0			
143			0				0				0			
144			0				0				0			
145			0				0				0			
146			0				0				0			
147			0				0				0			
148			0				0				0			
149			0				0				0			
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152			0				0				0			
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170			0				0				0			
171			0				0				0			
172			0				0				0			
173			0				0				0			
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175			0				0				0			
176			0				0				0			
177			0				0				0			
178			0				0				0			
179			0				0				0			
180			0				0				0			
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262			0				0				0			
263			0				0				0			
264			0				0				0			
265			0				0				0			
266			0				0				0			
267			0				0				0			
268			0				0				0			
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270			0				0				0			
271			0				0				0			
272			0				0				0			
273			0				0				0			
274			0				0				0			
275			0				0				0			
276			0				0				0			
277			0				0				0			
278			0				0				0			
279			0				0				0			
280														

Visible Emission Observation Form

SOURCE NAME <i>SAMSULLA RECYCLING INC</i>			OBSERVATION DATE <i>02/28/01</i>				START TIME <i>9:12 AM</i>				STOP TIME <i>9:42 AM</i>			
ADDRESS <i>363 SR 415</i>			SEC				SEC							
			MIN				MIN							
			0				0							
			15				15							
			30				30							
			45				45							
CITY <i>NEW SMYRNA BEACH</i>			STATE <i>FL</i>				ZIP <i>32168</i>							
PHONE			SOURCE ID NUMBER <i>7775112-001-AC</i>											
PROCESS EQUIPMENT <i>SCREEN(S)</i>			OPERATING MODE <i>100 T/HR</i>											
CONTROL EQUIPMENT <i>SPRAY NOZZLE</i>			OPERATING MODE											
DESCRIBE EMISSION POINT <i>OF RECYCLING UNIT</i>														
START SCREENS AT FRONT STOP														
HEIGHT ABOVE GROUND LEVEL START <i>20'</i> STOP <i>20'</i>			HEIGHT RELATIVE TO OBSERVER START <i>14'</i> STOP <i>14'</i>											
DISTANCE FROM OBSERVER START <i>40'</i> STOP <i>40'</i>			DIRECTION FROM OBSERVER START <i>NNW</i> STOP <i>NNW</i>											
DESCRIBE EMISSIONS START <i>LOFTING</i> STOP <i>SAME</i>														
EMISSION COLOR START <i>CLEAR</i> STOP <i>SAME</i>			PLUME TYPE CONTINUOUS <input type="checkbox"/>											
			FUGITIVE <input checked="" type="checkbox"/> INTERMITTENT <input type="checkbox"/>											
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			IF WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>											
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED START <i>1' ABOVE SCREENS</i> STOP <i>SAME</i>														
DESCRIBE BACKGROUND START <i>TREES</i> STOP <i>SAME</i>														
BACKGROUND COLOR START <i>GREEN</i> STOP			SKY CONDITIONS START <i>PC</i> STOP <i>PC</i>											
WIND SPEED START <i>CALM</i> STOP <i>1-2 MPH</i>			WIND DIRECTION START <i>N/A</i> STOP <i>W</i>											
AMBIENT TEMP. START <i>71°F</i> STOP <i>75°F</i>			WET BULB TEMP				RH. percent							
<p>Source Layout Sketch Draw North Arrow</p> <p>Crusher, Belt, Emission Point, Observer's Position, Sun Location Line, Sun Wind Plume and Stack</p>														
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0%</i>			NUMBER OF READINGS ABOVE <i>0</i> % WERE <i>0</i>											
RANGE OF OPACITY READINGS <i>0%</i> MINIMUM			<i>0%</i> MAXIMUM											
OBSERVER'S NAME (PRINT) <i>KELLY ROBERTS</i>			OBSERVER'S SIGNATURE <i>Kelly Roberts</i>				DATE <i>02/28/01</i>							
COMMENTS			ORGANIZATION <i>AIR COMPLIANCE EVALUATORS</i>											
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY <i>EASTERN TECHNICAL ASSOC.</i>				DATE <i>02/14/01</i>							
TITLE			DATE				VERIFIED BY				DATE			

Visible Emission Observation Form

SOURCE NAME			OBSERVATION DATE				START TIME				STOP TIME			
SAMBULA RECYCLING INC.			02/28/01				9:45 AM				10:15 AM			
ADDRESS			SEC				SEC							
363 SR 415			MIN	0	15	30	45	MIN	0	15	30	45		
CITY			1				31							
NEW SMYRNA BEACH			2				32							
STATE			3				33							
FL			4				34							
ZIP			5				35							
32168			6				36							
PHONE			7				37							
SOURCE ID NUMBER			8				38							
775112-001-AC			9				39							
PROCESS EQUIPMENT			10				40							
PORTABLE BELT CONVEYOR(S)			11				41							
OPERATING MODE			12				42							
100 T/HR			13				43							
CONTROL EQUIPMENT			14				44							
SPRAY NOZZLE			15				45							
OPERATING MODE			16				46							
DESCRIBE EMISSION POINT			17				47							
START CONVEYOR DROP POINT FROM SCREENS STOP			18				48							
HEIGHT ABOVE GROUND LEVEL			19				49							
START 5' STOP 5'			20				50							
HEIGHT RELATIVE TO OBSERVER			21				51							
START -1' STOP -1'			22				52							
DISTANCE FROM OBSERVER			23				53							
START 80' STOP 80'			24				54							
DIRECTION FROM OBSERVER			25				55							
START NW STOP NW			26				56							
DESCRIBE EMISSIONS			27				57							
START LIFTING STOP SAME			28				58							
EMISSION COLOR			29				59							
START CLEAR STOP SAME?			30				60							
PLUME TYPE CONTINUOUS <input type="checkbox"/>			AVERAGE OPACITY FOR HIGHEST PERIOD				NUMBER OF READINGS ABOVE							
FUGITIVE <input checked="" type="checkbox"/> INTERMITTENT <input type="checkbox"/>			0%				0% WERE 0							
WATER DROPLETS PRESENT: NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			RANGE OF OPACITY READINGS				0% MINIMUM 0% MAXIMUM							
IF WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			OBSERVER'S NAME (PRINT)				KELLY ROBERTS							
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED			OBSERVER'S SIGNATURE				DATE							
START / ABOVE DROP POINT OF CONVEYOR STOP			KELLY ROBERTS				02/28/01							
DESCRIBE BACKGROUND			ORGANIZATION				AIR COMPLIANCE EVALUATORS							
START HOPPER STOP SAME			OBSERVER'S SIGNATURE				DATE							
BACKGROUND COLOR			KELLY ROBERTS				02/28/01							
SKY CONDITIONS			I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS				SIGNATURE							
START RUST STOP SAME			EASTERN TECHNICAL ASSOC				DATE							
START PC STOP SCAT.			CERTIFIED BY				DATE							
WIND SPEED			EASTERN TECHNICAL ASSOC				02/24/01							
START 1-2 MPH STOP SAME			VERIFIED BY				DATE							
WIND DIRECTION			TITLE				DATE							
START WSW STOP SAME			DATE				DATE							
AMBIENT TEMP			TITLE				DATE							
START 75°F STOP 77°F			DATE				DATE							
WET BULB TEMP			TITLE				DATE							
RH. percent			DATE				DATE							
SOURCE LAYOUT SKETCH			TITLE				DATE							
			TITLE				DATE							

Visible Emission Observation Form

SOURCE NAME <i>SAMSULA RECYCLING INC.</i>			OBSERVATION DATE <i>02/28/01</i>				START TIME <i>10:18</i>				STOP TIME <i>10:48</i>			
ADDRESS <i>363 SR 415</i>			SEC MIN 0 15 30 45				SEC MIN 0 15 30 45							
CITY <i>NEW SMYRNA BEACH</i>			STATE <i>FL</i>		ZIP <i>32168</i>		1				31			
PHONE			SOURCE ID NUMBER <i>7775112-001-AC</i>		2				32					
PROCESS EQUIPMENT <i>TRUCK LOADING/UNLOADING</i>			OPERATING MODE <i>100 T/HR</i>		3				33					
CONTROL EQUIPMENT <i>SPRAY NOZZLE</i>			OPERATING MODE		4				34					
DESCRIBE EMISSION POINT <i>CONVEYOR AT END OF RECYCLE SYSTEM</i>			START <i>DROP POINT FOR STOP</i>		5				35					
HEIGHT ABOVE GROUND LEVEL <i>START 27' STOP 27'</i>			HEIGHT RELATIVE TO OBSERVER <i>START 21' STOP 21'</i>		6				36					
DISTANCE FROM OBSERVER <i>START 46' STOP 45'</i>			DIRECTION FROM OBSERVER <i>START N/W STOP SAME</i>		7				37					
DESCRIBE EMISSIONS <i>START LOFTING STOP SAME</i>					8				38					
EMISSION COLOR <i>START CLEAR STOP SAME</i>			PLUME TYPE CONTINUOUS <input type="checkbox"/>		9				39					
WATER DROPLETS PRESENT <i>NO YES</i>			IF WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		10				40					
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED <i>START 1' FROM END OF CONVEYOR STOP SAME</i>					11				41					
DESCRIBE BACKGROUND <i>START SKY STOP SAME</i>					12				42					
BACKGROUND COLOR <i>START BLUE STOP SAME</i>			SKY CONDITIONS <i>START SCAT. STOP SAME</i>		13				43					
WIND SPEED <i>START 2-4 mph STOP SAME</i>			WIND DIRECTION <i>START W STOP SAME</i>		14				44					
AMBIENT TEMP <i>START 77°F STOP 79°F</i>			WET BULB TEMP		RH. percent		15				45			
<p>Source Layout Sketch      Draw North Arrow</p>			16				46							
			17				47							
			18				48							
			19				49							
			20				50							
			21				51							
			22				52							
			23				53							
			24				54							
			25				55							
			26				56							
			27				57							
28				58										
29				59										
30				60										
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0%</i>						NUMBER OF READINGS ABOVE <i>0%</i> WERE <i>0</i>								
RANGE OF OPACITY READINGS <i>0%</i> MINIMUM <i>0%</i> MAXIMUM														
OBSERVER'S NAME (PRINT) <i>KELLY ROBERTS</i>														
OBSERVER'S SIGNATURE <i>Kelly Roberts</i>						DATE <i>02/28/01</i>								
ORGANIZATION <i>AIE COMPLIANCE EVALUATORS</i>														
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE						CERTIFIED BY <i>EASTERN TECHNICAL ASSOC.</i>								
TITLE						DATE <i>02/14/01</i>								
DATE						DATE								



State of Florida

**Department of  
Environmental Protection**

This is to Certify That **KELLY ROBERTS**

has completed the STATE OF FLORIDA visible emissions evaluation training and is a qualified observer of visible emissions as specified by EPA reference method 9.

This Certificate Expires **Aug 16, 2001**

  
Certificate Officer

  
Beep's Signature

Your certificate is valid for six (6) months. To keep your certification current, you must recertify on or before the expiration date on the card. Please mark your calendar accordingly.

Provided field certification is continuous the classroom certificate expires:

**Feb 15, 2002**

If field certification is not continuous classroom certification must be obtained prior to your next field certification attempt.

If you have any questions about your certification, please contact M.D. Harley at 850/921-9509.

# CORPORATE ENVIRONMENTAL POLICY

## STATE-WIDE CRUSHING OPERATION

### SAMSULA RECYCLING, INC.

#### 1. Objective

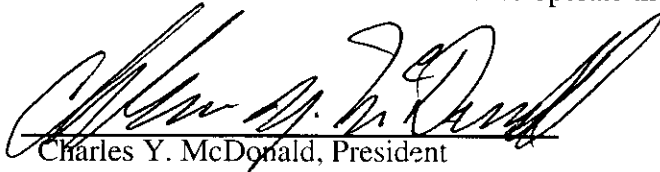
Samsula Recycling, Inc., will conduct business, operate associated equipment and handle the associated materials:

- To maintain compliance with the applicable air permits (construction and operational) issued by the Florida Department of Environmental Protection (FDEP),
- To minimize the potential of violating other environmental regulations, and
- To minimize the potential of nuisance concerns (noise, vibration, dust) to neighboring residents, businesses, and/or individuals.

#### 2. Policies

To achieve the stated objective, Samsula Recycling, Inc., will:

- Obtain and maintain applicable FDEP air permits.
- Process only materials designated in the permit(s).
- Maintain the area of the crushing operation to comply with applicable and/or associated regulations.
- Operate and maintain the equipment to achieve compliance with the permit conditions and in a manner to minimize the potential of environmental concerns/impacts.
- Operate only on properties that do not have other permitted air pollution facility or obtain appropriate modifications to the associated air permits.
- Conduct required monitoring to demonstrate compliance.
- Develop and maintain training programs, initial and refresher.
- Train all related personnel with the crusher operation, permit conditions, environmental concerns, and nuisance concerns.
- Maintain an operational log of all materials delivered to the facility, materials accepted/rejected, materials processed, dust suppressant quantity used, equipment maintenance performed, and processed materials removed.
- Minimize the potential of nuisance concerns (noise, vibration, dust) to neighboring residents, businesses, and/or individuals.
- Notify the FDEP of modifications to the crusher operation prior to making the modifications.
- Use new No. 2 oil or better fuel to operate the diesel engine.

  
Charles Y. McDonald, President

3-23-01  
Date