Florida Department of Environmental Protection

Northwest District
160 Governmental Center, Suite 308
Pensacola, Florida 32502-5794

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

February 1, 2010

BY ELECTRONIC MAIL
jshuler@cwrcontracting.com

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

Dear Mr. Roberts:

On January 20, 2010, a Department representative with the Air Resource Management Program performed a file review of your facility, Crusher #1, ID 7775155, and performed a site visit in Freeport where Crusher #1 had been located. A visual inspection of the crusher could not be conducted during the site visit because the crusher had been relocated to 1605 Bay Avenue in Panama City on January 8, 2010. However, during the site visit in Freeport, records of hours of operation and fuel usage were made available for Department review. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-8300, extension 1222 or Jennifer.Waltrip@dep.state.fl.us.

Sincerely,

Erica Mitchell

Erica Mitchell
Air Compliance Supervisor

EM/jw/c

Enclosure
c: Darren Phillips, Plant Manager (dphillips@cwrcontracting.com)

NON-METALLIC MINERAL PROCESSING PLANTS

Environmental Compliance

COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 7775155 **DATE:** 1/20/10 **ARRIVE:** _____ **DEPART:** _____

FACILITY NAME: CRUSHER #1

FACILITY LOCATION: 160 Industrial Park Rd

FREEPORT 32439-3117

OWNER/AUTHORIZED REPRESENTATIVE: CHARLES ROBERTS **PHONE:** (850)385-5060

CONTACT NAME: Darren Phillips **PHONE:** (850)835-3519

ENTITLEMENT PERIOD: 4/25/2008 (effective date) / 4/25/2013 (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 **R** 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 **R** 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

Questions 2 and 3.a), below, were not answered because a visual inspection was not conducted due to the crusher being relocated to Bay County.

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 **R** only **one** box)

☒ **FOR FACILTIES SUBJECT TO**: (40 CFR Part 60, Subpart OOO, §60.670(a)(1))
(If you have checked R 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-mettalic 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 R 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 not 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 **R** 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

Questions 2.a), 2.b), and 3., below, were not answered because the crusher does not have a capture device/stack.

**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
3. Do stack emissions from any baghouse that controls emissions from only an individual, enclosed storage bin exceed **7% percent opacity?---------- ☐ Yes ☐ No

PART III: EMISSION STANDARDS – Chapter 62-210.310(5)(e), F.A.C., Cont.

(check **R** appropriate box(es))

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.

Questions 4 through 5 below were not answered becaust the crusher is not enclosed

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:

This crusher does not utilize wet screening or perform wet mining.

**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 **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.)---------- ☒ 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

Questions 5 and 6, below not answered because fugitive emissions testing and particulate mattter testing not required.

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

Questions 7 through 9 not answered because no replacements were made.

**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

Questions 8 through 10 below not answered because this crusher does not have a scrubber.

**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 **R** 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 **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 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 **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.)*---------- ☐ 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 **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.)

Question 2, below was not answered because this crusher is not co-located with a concrete batch plant.

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 **R** 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

Jennifer Waltrip	January 20, 2010
Inspector's Name (Please Print)	Date of Inspection
Jennifer Waltrip	January 2011
Inspector's Signature	Approximate Date of Next Inspection

COMMENTS: Department personnel conducted the annual air program compliance inspection on January 20, 2010 of the CW Roberts RAP Crusher #1. The crusher relocated to 1605 Bay Avenue in Panama City on January 8, 2010. Therefore, a visual inspection of the crusher was not conducted. Records of hours of operation and fuel usage were available for review.

For the period of time from January 2009 to December 2009, the crusher used 9,003 gallons of fuel and crushed 82,474 tons of material.

The most recent visible emission test was conducted on September 17, 2009. Test results were well within the permitted limits.