

**INSPECTION REPORT FORM
AIR POLLUTION EMISSION SOURCES**

FACILITY: MFM Industries		DISTRICT: Central District	COUNTY: Marion
ADDRESS: 3951 NW CR 329, Reddick, FL		CONTACT: Michael Gascoigne - Plant Manager	
AIRS# 0830017	PERMIT #: 0830017-011-AO	EXPIRATION DATE: January 30, 2014	
SOURCE DESCRIPTION: Clay Dryer and Fugitive Dust Collection System			
INSPECTION DATE: November 9, 2009	AUDIT TYPE: Level 2	COMPLIANCE STATUS: Out-of-compliance	
INSPECTION COMMENTS/RECOMMENDATIONS:			
<p>On November 9, 2009, Ms. Wanda Parker-Garvin of FDEP visited the subject facility to address a complaint and perform a level 2 compliance inspection. Upon entering the property Ms. Parker-Garvin observed/photographed a dust cloud on the site. No unconfined emissions were seen leaving the site at the time of inspection. Contact was made with Mr. Michael Gascoigne, Plant Manager. Ms. Parker-Garvin informed Mr. Gascoigne that she was there because a complaint was received stating fugitive emissions were leaving the facility and getting on homeowner properties located within the area. Mr. Gascoigne accompanied Ms. Parker-Garvin on a walkthrough inspection of the entire facility. The work area inside the building was clear of dust and particulate matter. Mr. Gascoigne stated a new bag house was installed in July 2008. The bags are checked monthly by dye and changed as needed. There were no major maintenance issues since the last inspection. The facility mine is located seven (7) miles west and material is trucked to the site in contracted trucks.</p> <p>The facility was in operation at the time of inspection. Several tanks were observed including the following:</p> <ul style="list-style-type: none"> • Tank #9 contains only dust which sells as product; • Tanks #7 and #8 contain product; • Tanks #1, #2, #3, #4 and #5 – four of which contain product and one which contains bentonite. <p>Mr. Gascoigne stated the fugitive emissions were due to the high winds experienced in the past couple of days. He further stated a water truck had run 4 times per hour on the day of the inspection. There were high sprinklers observed at the site entrance which ran every 30 minutes. Ms. Parker-Garvin informed Mr. Gascoigne of the dust cloud she previously observed and he stated it was the result of fugitive emissions from the load-out area. Ms. Parker-Garvin observed inoperable sprinklers at the top of the load-out area and suggested they be repaired/operated to prevent emissions of unconfined particulate matter. There were sections of the load-out area that were not totally enclosed and which showed visual evidence of accumulated unconfined particulate matter on the outside. Ms. Parker-Garvin suggested covering those areas to confine particulate matter. There were also areas at the entrance/exit that showed evidence of emissions of accumulated unconfined particulate matter caused by trucks entering/exiting the site. Ms. Parker-Garvin suggested putting in additional sprinklers at the entrance/exit to further prevent unconfined emissions. After the inspection Mr. Gascoigne stated he would provide Ms. Parker-Garvin with the records required by the permit via e-mail. Leaving the facility Ms. Parker-Garvin observed accumulated unconfined particulate matter on the trees directly across the street from the facility. (See attached photo log.)</p> <p><u>Facility-wide Conditions</u> Areas were observed where reasonable precautions had not been taken to prevent the emission of unconfined particulate. No objectionable odor was detected on or off the facility property. Sprinklers are in place and being used to control fugitive dust in some areas. Dust was not being adequately controlled at the facility. Intermittent visible emissions appeared to be in excess of the permitted opacity limitations. A Method 9 observation was not conducted because the emissions were intermittent.</p>			
INSPECTOR(S) NAME(S):		Wanda Parker-Garvin	
SIGNATURE(S):		DATE: November 18, 2009	

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<p><u>Emission Units and Conditions (July 2008 – October 2009)</u> Emission limits could not be verified because the recordkeeping documents submitted were not in compliance with the requirements of the permit. An amended inspection report with the limits will be prepared upon clarification of the facility recordkeeping documents.</p> <p>Upon leaving the facility, Ms. Parker-Garvin went to the residence of the complainant, Mr. James Roland, located at 4150 NW County Road 329, Lowell. Ms. Parker-Garvin informed Mr. Roland that she was there to address his complaint. Mr. Roland proceeded to show Ms. Parker-Garvin his and his neighbors vehicles which were covered in the same clay-like substance processed at the MFM Industries facility. He stated the vehicles were both washed within the last 48 hours and the substance covers their vehicles, pool and inside their homes on a consistent basis. Mr. Roland stated the facility operates in the evenings and weekends when large clouds of white dust are observed coming from their stack.</p> <p>Mr. Roland then introduced Ms. Parker-Garvin to his tenants, Mr. David Kiefer and Mrs. Lillia Kiefer, who rent the home next door. The Kiefers' showed Ms. Parker-Garvin the clay-like substance which covered their barbeque grills located on a covered porch. The Kiefer's outside air conditioner unit was also covered in the clay-like substance. Both complainants showed concerns about the toxic effects and respiratory issues that may be associated with breathing the clay-like substance. (See attached photo log.)</p> <p>Based on the inspection and physical/visual evidence of emissions of unconfined particulate matter coming from the facility, the facility was found to be out-of-compliance with specific permit condition 9. of the permit, condition 21. pursuant to Rule 62-4.070 and 62-4.160(14) F.A.C. and condition 8. pursuant to Rule 62.296.320(4)(c)1., F.A.C.</p>			
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