



Florida Department of Environmental Protection

Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

June 1, 2012

By Electronic Mail, Received Receipt Requested
NoahM@prm-usa.com

Mr. Noah McBride
Operations Manager
Pensacola Ready Mix USA
Post Office Box 7142
Pensacola, Florida 32534

Dear Mr. McBride:

This is in response to a May 9, 2012 e-mail from your consultant; and a May 22, 2012 Department representative compliance assistance visit to your facility, ID 0330098. A report focusing on ways to improve compliance is enclosed.

As self-reported in the May e-mail, the facility violated Rule 62-297.310(8)(b), Florida Administrative Code (F.A.C.), for not submitting the March 15, 2012 visible emissions test report within 45 days after completing testing. As explained in the enclosed report, the facility also violated Rule 62-296.414(3)(c), F.A.C., for not indicating whether or not batching occurred during testing. This is required, because emissions from the weigh hopper (batcher) operation are also controlled by the silo dust collector.

Through this letter, the Department is exercising its enforcement discretion and will not pursue any additional air enforcement action at this time. This decision is based on the following items:

- One of the violations was self-reported;
- Department records indicate that there have not been any documented instances of non-compliance at the facility in the past five years;
- Department records indicate that all visible emissions tests that have been entered in the Departments database for facility 0330098 have an opacity result of 0%; and
- The March 13, 2012, visible emissions tests demonstrated compliance.

Please note that authority to operate this facility expires on March 17, 2013. To avoid lapse of authority to operate, an owner or operator intending to continue to use an air

Pensacola Ready Mix USA

Page 2

June 1, 2012

general permit must submit the proper registration form and processing fee at least 30 days prior to expiration of the facility's existing air operation permit or air general permit. You can obtain air general permit forms and information at the following web address: http://www.dep.state.fl.us/air/emission/air_gp.htm.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Chris Stoll at 850/595-0654 or e-mail christopher.stoll@dep.state.fl.us.

Sincerely,



Rick Bradburn
Air Program Administrator

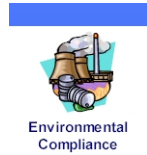
RB/ cm /c

Enclosure

c: Sue Cummings, Ready Mix USA: suecu@readymixusa.com
Michael G. Long, P.E.; Cornerstone Engineering: longm@bellsouth.net



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVERY (CI)
 RE-INSPECTION (FUI) ARMS COMPLAINT NO:

AIRS ID#: 0330098	DATE: <u>5/22/2012</u>	ARRIVE: <u>9:10 AM</u>	DEPART: <u>9:32 AM</u>
FACILITY NAME: WEST SIDE PLANT			
FACILITY LOCATION: 11575 SORRENTO RD PENSACOLA 32507			
OWNER/AUTHORIZED REPRESENTATIVE: NOAH MCBRIDE		PHONE: (850)477-2899	
Email: NoahM@readymixusa.com		Mobile: (850)554-5017	
CONTACT NAME:		PHONE:	
Email:		Mobile:	
ENTITLEMENT PERIOD: 3/17/2008 / 3/17/2013 (effective date) (end date)			

Facility Section

PART I: INSPECTION COMPLIANCE STATUS (check only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: ONSITE INTRODUCTORY MEETING (check only one box for each question)

1. Name(s) of facility representative(s): Allen Duncan
 Brief Notes: _____

2. Is the Authorized Representative still NOAH MCBRIDE? ----- Yes ..No
 If no, who is?: _____
 If different, did the facility provide an administrative update within 30 days? ----- Yes ..No

3. Is the facility contact still ? ----- Yes ..No
 If no, who is?: _____

4. Will facility be conducting VE test(s) during today's inspection? ----- Yes ..No
 If yes, was the compliance authority notified at least 15 days in advance? ----- Yes ..No

Emissions Unit Section

1-CONCRETE BATCH PLANT-TWO SILOS, ONE BAGHOUSE subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION

(check [X] only one box for each question)

- 1. Date of last inspection: 6/13/2011
2. Past Visible Emissions (VE) tests:
a. Was a VE test performed within each of the past 4 calendar years? [X] Yes [] No
b. Has a VE test been performed yet within the current calendar year? [X] Yes [] No
c. If first year of operation, was a VE test performed within 30 days of commencing operation? [] N/A [] Yes [] No
d. Date of last VE test: 3/15/2012
e. Was the VE test report filed with the compliance authority no later than 45 days after the test? [] Yes [X] No
f. Did the report state the actual silo loading rate during emissions testing? [X] Yes [] No
g. What was the actual silo loading rate? 27 tons/hour
h. If weigh hopper(batcher) emissions controlled by the silo dust collector, did the report state whether or not batching occurred during emissions testing? [] N/A [] Yes [X] No
i. Did the test report state the actual batching rate during emissions testing? [] Yes [X] No
j. What was the actual batching rate? _____ tons/hour
k. Did the emissions unit demonstrate compliance with the 5% opacity limit during the last VE test?-- [X] Yes [] No
If not, what was the problem (if known)? _____

PART II: STACK EMISSIONS from a silo, weigh hopper(batcher) or other enclosed storage and conveying equipment

(check [X] only one box for each question)

- 1. Was a visible emissions test conducted by the facility for this unit during this site visit? [] Yes [X] No
a. Was the visible emissions test conducted according to EPA Method 9? [] Yes [] No
b. The visible emission test resulted in an opacity of _____ % for the highest six-minute average.
c. Did the visible emissions test demonstrate compliance with the 5% opacity limit? [] Yes [] No
If not, what was the problem (if known)? _____
d. During visible emissions tests of the silo dust collector exhaust points was the loading of the silo conducted at a rate that is representative of the normal silo loading rate? [] Yes [] No [] N/A - silo not loaded during inspection.
e. If silo loaded, was the minimum loading rate of 25 tons/hour achievable in practice? [] Yes [] No
f. What was the silo loading rate? _____ tons/hour
g. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? [] Yes [] No
If YES, then continue on to questions g.1) - g.3) below. If answer NO, then skip g.1) - g.3) and go to h.
1) Was the weigh hopper (batcher) in operation during the visible emissions test? [] Yes [] No
2) During the visible emissions test, was the batching rate representative of the normal batching rate and duration? [] Yes [] No
3) What was the batching rate? _____ tons/hour . What was the batching duration? _____ minutes
h. 1) If emissions from the weigh hopper (batcher) operation are controlled by a dust collector which is separate from the silo dust collector, was the visible emissions test of the weigh hopper (batcher) dust collector conducted while batching at a rate that is representative of the normal batching rate and duration? [] Yes [] No
2) What was the batching rate? _____ tons/hour. What was the batching duration? _____ minutes.
2. Was a visible emissions test conducted by the inspector for this unit during this site visit? [] Yes [X] No
a. Was the visible emissions test conducted according to EPA Method 9? [] Yes [] No
b. The visible emission test resulted in an opacity of _____ % for the highest six-minute average.
c. Did the visible emissions test demonstrate compliance with the 5% opacity limit? [] Yes [] No
d. What was the process rate? _____ tons/hour.

Facility Section (continued)

CONFIRMATION OF GENERAL PERMIT ELIGIBILITY

(check only one
box for each question)

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
 - b. 25 tons per year or more of any combination of hazardous air pollutants? ----- Yes No
 - c. 100 tons per year or more of any other regulated air pollutant? ----- Yes No

2. Does this facility include:
 - 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) or Rule 62-4.040, F.A.C.)? ----- Yes No
 If YES, what non-exempt units or activities? _____

 - b. Any emissions units or activities authorized by another air general permit where such other air general permit and this general permit specifically allow the use of one another at the same facility? ----- Yes No
 If YES, what other general permit units or activities? _____

3. Is the total combined annual facility-wide fuel usage of all plants less than or equal to:
 - a. 275,000 gallons of diesel fuel? ----- Yes No
 - b. 23,000 gallons of gasoline? ----- Yes No
 - c. 44 million standard cubic feet on natural gas? ----- Yes No
 - d. 1.3 million gallons of propane? ----- Yes No
 - e. Or an equivalent prorated amount if multiple fuels are used onsite (use equation below)? ----- Yes No
$$\frac{\text{gal diesel/yr}}{275,000 \text{ gal diesel/yr}} + \frac{\text{gal gasoline/yr}}{23,000 \text{ gal gasoline/yr}} + \frac{\text{MM SCF nat. gas/yr}}{44 \text{ MM SCF nat. gas/yr}} + \frac{\text{MM gal propane/yr}}{1.3 \text{ MM gal propane/yr}} \leq 1.00?$$

4. Has the owner/operator maintained, available for inspection, site-wide records of monthly fuel consumption for each consecutive 12-period for the past 5 years? ----- Yes No

GENERAL CONDITIONS

(check only one
box for each question)

1. 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
2. Does the owner or operator:
 - a. Maintain the authorized facility in good condition? ----- Yes No
 - 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
3. 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

RELOCATABLE PLANT:

(check only one box for each question)

- 1. Is the facility: stationary ; relocatable ; or consisting of both stationary and relocatable concrete batching and/or nonmetallic mineral processing plants? *(If only stationary, skip the following question 2.)*
- 2. Is the relocatable concrete batching plant used to mix cement and soil for onsite soil augmentation or stabilization? ----- Yes No
(If YES, answer 2. a and 2. b; if NO, answer question 2.c below.)
 - a. Did the owner or operator notify the appropriate Department or Local Air Program by telephone, e-mail, fax, or written communication at least one business day prior to changing location? ----- Yes No
 - b. Did the owner or operator transmit a Facility Relocation Notification Form [DEP No. 62-210.900(6)] to the Department or Local Air Program no later than five business days following a relocation? ---- Yes No
 - c. Did the owner or operator transmit a Facility Relocation Notification Form [DEP No. 62-210.900(6)] to the appropriate Department or Local Air Program at least five business days prior to relocation? --- Yes No
- 3. If the relocatable plant was co-located at a facility with a separate air construction or air operation permit, and the relocatable batch plant is not included as an emissions unit in that separate permit:
 - a. Was the relocatable batch plant being used for a non-routine purpose (i.e, there is no repeated usage)? Yes No
 If YES, what was the purpose?
 - b. Were records kept by the owner/operator to indicate how long it was co-located at the permitted facility? ----- Yes No
 If YES, were any periods more than 6 months in duration? ----- Yes No

CHANGES

(check only one box for each question)

Administrative Changes:

- 1. Were there any changes in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or any other similar minor administrative change at the facility? ---- Yes No
- 2. If YES, did the facility provide written notification within 30 days of the change? ----- Yes No

New or Modified Process Equipment or Change in Ownership:

- 3. Since the last registration form submittal has there been
 - a. Installation of any new process equipment? ----- Yes No
 - b. Alterations to existing process equipment without replacement? ----- Yes No
 - c. Replacement of existing equipment with equipment that is substantially different? ----- Yes No
 - d. A change in ownership? ----- Yes No
- 4. If the answer to any question 3a. – d. is YES, was a new registration form and the appropriate fee submitted 30 days prior to the change? ----- Yes No

Chris Stoll

5/22/2012

Inspector's Name (Please Print)

Date of Inspection

5/1/2013

Approximate Date of Next Inspection

COMMENTS: On May 22, 2012, a compliance assistance visit was performed at the Pensacola Ready Mix Sorrento Road concrete batch plant. I met with the facility manager, Mr. Allen Duncan. The annual visible emissions test was performed by Cornerstone Engineering Services on March 15, 2012. During the 30-minute test there were no emissions observed. The test report indicates that two tankers were unloading at a rate of 26.9 tons per hour; however, the test report does not indicate whether or not batching occurred during emission testing.

Rule 62-296.414(3)(c), Florida Administrative Code, states that visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be

25 tons per hour unless such rate is unachievable in practice. If emissions from the weigh hopper (batcher) operation are also controlled by the silo dust collector, the batching operation shall be in operation during the visible emissions test. The batching rate during the emissions test shall be representative of the normal batching rate and duration. Each test report shall state the actual silo loading rate during emissions testing and, if applicable, whether or not batching occurred during emissions testing.

The March 15, 2012, visible emissions test was received by the Department on May 9, 2012, which was ten days late.

Rule 62-297.310(8)(b), Florida Administrative Code, states that test reports shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

To continue and/or improve compliance at the facility, please review the following rules.

62-296.414 Concrete Batching Plants.

(2) Unconfined Emissions. The owner or operator shall take reasonable precautions to control unconfined emissions from hoppers, storage and conveying equipment, conveyor drop points, truck loading and unloading, roads, parking areas, stock piles, and yards as required by paragraph 62-296.320(4)(c), F.A.C. For concrete batching plants the following shall constitute reasonable precautions:

(a) 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, and yards.
2. Application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions
3. Removal of particulate matter from roads and other paved areas under control of the owner or operator to mitigate reentrainment, and from building or work areas to reduce airborne particulate matter.
4. Reduction of stock pile height or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles.

(3) Test Methods and Procedures. All emissions tests performed pursuant to the requirements of this subsection shall comply with the following requirements.

(a) The reference test method for visible emissions shall be EPA Method 9, as described at 40 CFR, Part 60, Appendix A, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

(b) Test procedures shall conform to the procedures specified in Rule 62-297.310, F.A.C. All test results shall be reported to the Department in accordance with the provisions of Rule 62-297.310, F.A.C.

(c) Visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. If emissions from the weigh hopper (batcher) operation are also controlled by the silo dust collector, the batching operation shall be in operation during the visible emissions test. The batching rate during the emissions test shall be representative of the normal batching rate and duration. Each test report shall state the actual silo loading rate during emissions testing and, if applicable, whether or not batching occurred during emissions testing.

(d) If emissions from the weigh hopper (batcher) operation are controlled by a dust collector which is separate from the silo dust collector, visible emissions tests of the weigh hopper (batcher) dust collector exhaust point shall be conducted while batching at a rate that is representative of the normal batching rate and duration. Each test report shall state the actual batching rate during emissions testing.

(4) Frequency of Testing.

(a) The owner or operator of any concrete batching plant using an air general permit shall have a performance test conducted for visible emissions for each dust collector exhaust point no later than thirty (30) days after commencing operation, and annually thereafter.

(b) The owner or operator of any concrete batching plant operating under the authority of an air construction permit or air operation permit shall have a performance test conducted for visible emissions for each dust collector exhaust point prior to submitting the application for an initial air operation permit, and annually thereafter.

Unchecked boxes on the above checklist are not applicable at the time of inspection.