



CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST



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

Facility: Vulcan Materials Company
DBA/Site Name: Florida Rock Industries, Inc. - Largo
ADDRESS: 13175 95th Street North, Largo, FL
ARMS NO: 1030008 002
PERMIT NO: 1030008-004-AG
DISTRICT: Southwest
CONTACT PHONE: 941-809-3056
Expiration Date: 4/29/2017
Renewal Date: 3/30/2017
Test Date: 12/31/2013

EMISSION UNIT DESCRIPTION: Concrete Batch Plant: West side Split Silo, slag compartment. Emissions controlled by a CP305 baghouse

INSPECTION DATE: 5/29/13
INSPECTION COMPLIANCE STATUS (check [] only one box)
[X] In Compliance; [] Minor Non-Compliance; [] Significant Non-Compliance

PART I: General Review:

1. Permit File Review [X] Yes [] No
2. Introduction and Entry [X] Yes [] No
Comments: I met with Ronny Acker, plant manager, who answered my questions and provided me with maintenance documentation.
3. Is the Authorized Representative still: James Burkholder? [X] Yes [] No
Comments: The e-mail address is: BurkholderJ@vmcmail.com
4. Is the facility contact still: James Burkholder? [X] Yes [] No
Comments: The e-mail address is: BurkholderJ@vmcmail.com
5. If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [] Yes [] No
[62-210.310(2)(d), F.A.C.]

PART II: TESTING REQUIREMENTS - Rule 62-296.414, F.A.C.

(check [] appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Compliance Demonstration

1. [] New Facilities / [] New Process Equipment - (permitted pursuant to Rule 62-296.414(4)(a), F.A.C., Air General Permits)
Did this facility demonstrate initial compliance no later than 30 days after beginning operation? [] Yes [] No
2. [X] Existing Facilities - (permitted pursuant to Rule 62-296.414(4)(a), F.A.C., Air General Permits)
In order to demonstrate annual compliance, was an annual visible emissions test conducted on each dust collector exhaust point within 365 days (annually thereafter) of the previous visible emissions compliance test? [X] Yes [] No

Test Reports

3. Do the submitted visible emission tests demonstrate compliance with the 5 percent opacity limit? [X] Yes [] No
The last visible emission test, conducted on 3/1/12 resulted in an opacity of 0.0 % for the highest six minute average. [62-296.414(1) F.A.C.]
4. Was the department notified at least 15 days prior to the test? [62-297.310(4)(a)9, F.A.C.] [X] Yes [] No
5. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed? [62-297.310(8)(b)] [X] Yes [] No
6. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C.] [X] Yes [] No
7. 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, or at least at the minimum 25 tons per hour rate,

PART II: TESTING REQUIREMENTS – Rule 62-296.414, F.A.C.

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

- unless such rate is unachievable in practice? [62-296.414(3), F.A.C.] ----- Yes No
8. Are emissions from a weigh hopper (batcher) operation controlled by the silo dust collector? (If answer to this question is "Yes", then continue on to questions 8.a) and 8.b) below. If answer is "No" then skip to question 9.)----- Yes No
- a) Was the batching operation in operation during the visible emissions test? [62-296.414(3)(c), F.A.C.] ----- Yes No
- b) During the visible emissions test, was the batching rate representative of the normal batching rate and duration? [62-296.414(3)(c), F.A.C.] ----- Yes No
9. If emissions from the weigh hopper (batcher) operation are controlled by a dust collector, which is separate from the silo dust collector, are the visible emissions tests of the weigh hopper (batcher) dust collector while batching at a rate that is representative of the normal batching rate and duration? [62-296.414(3)(d), F.A.C.] - ----- Yes No
10. Was a visible emissions test(s) conducted by the inspector during this site visit according to EPA Method 9? ----- Yes No
- a) The visible emission test resulted in an opacity of _____% for the highest six minute average.
- b) Did the test indicate the facility is operating in compliance with the 5% opacity standard? ----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(5)(b), F.A.C.

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

1. Is this facility: 1) a stationary; 2) a relocatable; or does it have: 3) both, stationary and relocatable concrete batching and/or nonmetallic mineral processing plants? (Please check only one box.)
2. For any combination of stationary or relocatable concrete batching plants, located with other concrete batching plants or nonmetallic mineral processing plants:
- a) Are there any additional nonexempt units located at this facility? [62-210.310(5)(b)4.a., F.A.C.]----- Yes No
- b) Is the total combined annual facility-wide fuel usage of all plants less than or equal to the fuel usages listed below: [62-210.310(5)(b)4.b., F.A.C.] ----- Yes No
- 1) 275,000 gallons of diesel fuel – usage equals _____ gallons
- 2) 23,000 gallons of gasoline – usage equals _____ gallons
- 3) 44 million standard cubic feet on natural gas – usage equals _____ cubic feet
- 4) 1.3 million gallons of propane – usage equals _____ gallons
- 5) or an equivalent prorated amount if multiple fuels are used onsite – usage equals _____ % of all fuels
3. Does the owner/operator of the concrete batching plant submitting this registration maintain records to account for site-wide fuel consumption for each calendar month and each consecutive twelve (12) months, and are these records available for Department inspection for a period of at least five (5) years? [62-210.310(5)(b)4.d., F.A.C.] Yes No

Relocation Notification - (Rule 61-210.310(5)(b)3.b., F.A.C.)

1. Is the relocatable concrete batching plant used to mix cement and soil for onsite soil augmentation or stabilization?—(if your answer is YES, please proceed to 1. a) thru 1.b) below) ----- Yes No
- a) Did the owner or operator notify the Department by telephone, e-mail, fax, or written communication at least one (1) 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 no later than five (5) business days following a relocation? ----- Yes No
- If your answer to number 1. above is NO, proceed to 2. below**
2. Did the owner or operator transmit a Facility Relocation Notification Form (DEP No. 62-210.900(6)) at least five (5) business days prior to relocation? ----- Yes No

PART IV: Unconfined Emissions - 62-296.414(2)

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

1. Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfined emissions ----- Yes No
- Which of the following methods are used:
- 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, 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

PART IV: Unconfined Emissions - 62-296.414(2)

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

- particulate matter from stock piles? ----- Yes No
- b) use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck? ----- Yes No

PART V: General Procedure Requirements and Conditions

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

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? [62-210.310(2)(d), F.A.C.] ----- Yes No

Permit Effective Period – [62-210.310(3)(a), F.A.C.]

- 1. Is the general permit for this facility still within the 5 year effective period? ----- Yes No
- 2. Did the facility submit the new re-registration form at least 30 days prior to permit expiration? ----- Yes No

New or Modified Process Equipment or Change in Ownership

- 1. Since the last registration form submittal has there been [62-210.310 (2)(b)2]
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to 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) Change in ownership----- Yes No
- If any of the answers to 1a) – 1d) is **Yes**, a new registration form and appropriate fee should have been submitted 30 days prior to the change.----- Yes No

Noncompliance Notice: - [62-210.310(3)(i), F.A.C.]

- 1. Did the facility have any instances where they were unable to comply with or will be unable to comply with any condition or limitation of the air general permit? ----- Yes No
 If the answer is **Yes**, proceed to a) and b).
 - a) Did the owner or operator provide immediate notification to the Department? ----- Yes No
 - b) Did the notification include:
 - 1. A description of and cause of noncompliance?----- Yes No
- 2. The period of noncompliance, including 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? ----- Yes No

PART VI: Comments

O&M Plan

The pollution control equipment shall be operated and maintained in accordance to the operation and maintenance (O&M) plan. The O&M plan shall include, but is not limited to:

- (1) Operating parameters of the pollution control device;
- (2) Time table for the routine maintenance of the pollution control device as specified by the manufacturer;
- (3) Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation;
- (4) A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises of the permit applicant;
- (5) A record log which will indicate, at a minimum:
 - a. When maintenance and observations were performed;
 - b. What maintenance and observations were performed; and
 - c. Who performed said maintenance and observations.
 - d. Acceptable parameter ranges for each operational check.

[Pinellas County Code, Subsection 58-128]

Reviewed records for the months of _____ 1/2012 through 5/2013 _____

Comments:

Visual observation of the three silo emission control units appears to indicate that different model types may be in use other than what was submitted in the recently submitted (2012) re-registration. The registration indicates EU's 002, 003, 004 are all controlled by CP305 baghouses. Observation shows that EU's 002 and 003 appear to be C&W "O" series round silo dust collectors. EU 004 appears consistent with the shape of the registered CP305 model. I contacted Mr. Burkholder via phone on 5/30/13 and asked to get clarification on the descriptions of the silo dust collectors. Mr. Burkholder replied and discovered that EU 002 and EU 003 are C&W LPR models and not the registered CP305. Mr. Burkholder also stated that during this discovery, he was made aware of a vent filter located on the weigh hopper that he feels should be registered as a separate EU because it has the potential to emit pollutants into the atmosphere. He was unsure of the specifications of this vent filter and is pursuing more information. Mr. Burkholder stated that he was intending on re-registering the facility with the correct updated control device description information and also updating and resubmitting any Operation and Maintenance plans necessary to PCAQD. He indicated that both the CP305 and the LPR model baghouses seem to have similar operation and maintenance procedures.

The sand and aggregate stockpiles at the facility were being kept at a height above the facility wind breaks. I verbally addressed that practice may cause fugitive dust issues if weather conditions became unfavorable. The rock stockpiles had sprinklers operating on them but the sand stockpile did not have any sprinkler system installed.

The paved yard was in overall good condition and free of dust. There was an area near the north exit that has had some dust accumulating. This area was wet from a nearby truck washout which prevented fugitive dust from vehicular movement. A sweeper truck is typically utilized once a month to clean the yard. The facility log indicates that the sweeper was last on site on 4/29/13. More frequent sweeping was discussed to prevent dust accumulation. Mr. Acker also explained that he uses facility hoses to wet certain areas if dust begins to accumulate. Mr. Acker and Mr. Burkholder also stated that the plant manager has the ability to call a sweeper truck to come onsite to clean the yard at any time.

Maintenance logs for each EU have been utilized and mostly complete. I verbally addressed being sure to perform and document all checks of the O&M plan. It appears that the model of silo dust collector has changed on the form since the last acquired log sheets from the 1/2012 inspection. The old sheets (9/2011-12/2011) list a CP-LPR-6-S-FS as the model for EU 002. The new sheets list the registered CW CP305 model baghouse.

Compressed air for the entire plant is generated from a single compressor then regulated out to each control device.

A VE test has been performed for the facility on 5/8/13 but has not yet been submitted to PCAQD as of 5/30/13. Mr. Burkholder stated that it should arrive within days.

A truck load-out was observed during the inspection with the central dust collector (EU 001) being utilized. Almost no fugitive dust was observed from this process. The truck load out had a metal partial enclosure around the larger structure, a rubber boot around the drop point, and a rubber chute delivering the material directly into the truck.

Exit Interview:

I informed Mr. Acker that it appeared that the facility was in compliance at this time. I re-iterated some improvement that could be made to prevent fugitive dust including increasing the frequency of utilizing the sweeper truck and reducing the stockpile height to a level that is below the top of the wind breaks.

Further information was gathered about equipment descriptions of the facility and a verbal warning was given to Mr. Burkholder to notify of any changes in equipment at the permitted facility. Mr. Burkholder is preparing to re-register the facility and update any O&M plans necessary.

Brennan Farrington

Inspector's Name

5/29/13

Date of Inspection

Inspector's Signature

~4/2014

Approximate Date of Next Inspection

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