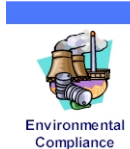




CONCRETE BATCHING PLANT
COMPLIANCE INSPECTION CHECKLIST



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

FACILITY: Davis Concrete, Inc.		DISTRICT:
DBA/Site Name: Davis Concrete, Inc. - Dunedin		Southwest
ADDRESS: 968 Douglas Avenue Dunedin, FL		CONTACT PHONE: 727-733-3141
ARMS NO: 1030113 001	PERMIT NO: 1030113-002-AG	Expiration Date: 7/21/12 Renewal Date: 6/21/12 Test Date: VE test on 02/06/08

EMISSION UNIT DESCRIPTION: Cement Storage Silo No. 1: 280 Barrel Capacity Silo (North), Emissions Controlled by a Stephens manufacturing Company, Model SV-170

INSPECTION DATE: 10/09/08	INSPECTION COMPLIANCE STATUS (check <input type="checkbox"/> only one box) <input type="checkbox"/> In Compliance; <input checked="" type="checkbox"/> Minor Non-Compliance; <input type="checkbox"/> Significant Non-Compliance
-------------------------------------	--

PART I: General Review:

1.	Permit File Review	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.	Introduction and Entry	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments: Wayne Martin and I attempted to inspect this facility on 10/08/08. The secretary was the only employee on premises, she was not able to leave her post to guide our physical inspection of the site nor did she have access to the needed records. The inspection was performed on 10/09/08. Randy Davis showed us the silos/yard and made the records available. Mr. Davis was informed of the section of the Rule 62-210.310 that states the Depts. right to inspect a facility at reasonable times, i.e. normal operating hours. Mr. Davis has stated that he will make the records accessible to the secretary at all times but insists that a Dept. inspector be accompanied during the site inspection.</i>		
3.	Is the Authorized Representative still <u>L. Douglas Davis</u>?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments:</i>		
4.	Is the facility contact still <u>L. Douglas Davis</u>?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments:</i>		
5.	If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [62-210.310(2)(d), F.A.C.]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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. ☒ **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 tested within 365 days (annually thereafter) of the previous visible emissions compliance test?----- ☒ Yes ☐ No

Test Reports

3. Do the submitted visible emission tests demonstrate compliance with the 5 percent opacity limit? ----- ☒ Yes ☐ No
The last visible emission test resulted in an opacity of 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.] ----- ☐ Yes ☒ No

See comment #1

5. Was the required test report filed with the department as soon as practical, but no later than 45 days after the

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)

- test was completed? [62-297.310(8)(b)] ----- ☒ Yes ☐ No
6. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C.] ----- ☒ 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, unless such rate is unachievable in practice? [62-296.414(3), F.A.C.] ----- ☒ Yes ☐ No
8. Are emissions from the 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
- See comment #2.**
10. Was a visible emissions test(s) conducted by the inspector during this site visit according? ----- ☐ 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 concreted 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 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 change 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 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 the any of the answers to 1a) – 1d) is **Yes** to any, 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]

See comment # 3.

Reviewed records for the months of: 01/02/07 to 10/08/08

Comments:

1) There is no indication in the files of notification of the latest V.E. test. Last V.E. completed on 02/08/08.

2) *The emissions from the weigh hopper are confined by an enclosure.*

3) It appears that the O&M plan is being followed. However, the silo fill records for the period from 01/02/07 to 10/18/07 were copied (pre-filled in) for the **silo#**, **level ind.**, **vent** and **line pressure** columns. Furthermore, the silo fill records stop on 02/06/08. They start again on 03/06/08 and then stop again on 03/10/08. The records begin again in June (06/08) Restated: the silo fill records are missing from: 02/07/08 to 03/05/08 and 03/11/08 until 06/01/08.

Closing comments: Mr. Davis was made aware of the irregularities in the O&M record files, specifically the pre-filled fields and the missing records. Mr. Davis was also made aware of the requirement to give the Department reasonable access to the records. Mr. Davis indicated that the records will be accessible to the secretary at all times which will then be accessible to us. Mr. Davis also stated that a more concentrated effort will be made to accurately record all necessary data.

Chris R. Brodeur

Inspector's Name

10/09/08

Date of Inspection

Inspector's Signature

10/09

Approximate Date of Next Inspection

H:\users\wpdocs\airqual\Air_Compliance\AQI\1030113 001 66970.doc 11/6/2008

11/6/2008