



Florida Department of Environmental Protection

Northwest District Office
2353 Jenks Avenue
Panama City, Florida 32405-4389

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

May 7, 2012

BY ELECTRONIC MAIL
suecu@readymixusa.com

Ms. Sue Cummings
Environmental Manager
Ready Mix USA, LLC
Post Office Box 101868
Birmingham, Alabama 35210

Dear Ms. Cummings:

On March 30, 2012, a Department representative with the Air Resource Management Program inspected the Ready Mix USA MLK Concrete Batch Plant ID 0050039. 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 C. Mark Sumner at 850/767-0046, or by email at mark.c.sumner@dep.state.fl.us.

Sincerely,

Clifford D. Wilson III, P.E.
Panama City Branch Administrator

CDW/ms

Enclosure

c: Ms. Mary Beth Curle, FDEP Pensacola (mary.beth.curle@dep.state.fl.us)
Ms. Carol Melton, FDEP Pensacola (carol.melton@dep.state.fl.us)
Mr. Wiley Willoughby, Operations Manager (wileyw@readymixusa.com)



CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST



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

| | | | |
|--|-------------------------------|------------------------------|-----------------------------|
| AIRS ID#: 0050039 | DATE: <u>3/30/2012</u> | ARRIVE: <u>9:44</u> | DEPART: <u>10:55</u> |
| FACILITY NAME: PANAMA CITY MAIN | | | |
| FACILITY LOCATION: 1810 MARTIN LUTHER KING JR BLV PANAMA CITY 32401- | | | |
| OWNER/AUTHORIZED REPRESENTATIVE: Sue Cummings | | PHONE: (205)986-4800 | |
| Email: suecu@readymixusa.com | | Mobile: (205)936-3572 | |
| CONTACT NAME: WILEY WILLOUGHBY | | PHONE: (850)785-1934 | |
| Email: wileyw@readymixusa.com | | Mobile: (850)258-1634 | |
| ENTITLEMENT PERIOD: 7/9/2010 / 7/9/2015 (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): Steve Castro

Brief Notes: HS&E Resources conducted a Method 9 VE test at the time of this inspection.

2. Is the Authorized Representative still SUE CUMMINGS? ----- Yes ..No
 If no, who is?: NA

If different, did the facility provide an administrative update within 30 days? ----- N/A Yes ..No

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

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 –CCB Plant-RMPIt2cement&1flyashsilos&batch/loadingw/baghouses subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

1. Date of last inspection: 11/17/2010
2. Did the emissions unit use reasonable precautions during the last inspection? ----- Yes No
If not: a. Did the inspector perform a general VE test (20% opacity)? ----- Yes No
b. If tested: (NA)% opacity. Were the visible emissions < 20% opacity? ----- N/A Yes No
c. What caused the problem(s) (if known)? NA

PART II: FIELD OBSERVATIONS – Rule 62-296.414(2), F.A.C.

Unconfined Emissions from Truck Loading and Unloading, Hoppers, Storage and Conveying Equipment, Conveyor Drop Points, Roads, Parking Areas, Stock Piles, and Yards

1. Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfined emissions by:
- 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
2. If reasonable precautions not being taken:
- a. Did the inspector perform a general VE test (20% opacity)? ----- Yes No
- b. If tested: (NA)% opacity. Were the visible emissions < 20% opacity? ----- N/A Yes No
- c. What caused the problem(s) (if known)? NA

Emissions Unit Section

3-CCB Plant-Block Plt, 1 cementsilo w/ baghouse subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

- 1. Date of last inspection: 11/17/2010
- 2. Did the emissions unit use reasonable precautions during the last inspection? ----- Yes No
If not: a. Did the inspector perform a general VE test (20% opacity)? ----- Yes No
b. If tested: (NA)% opacity. Were the visible emissions < 20% opacity? ----- N/A Yes No
c. What caused the problem(s) (if known)? NA

PART II: FIELD OBSERVATIONS – Rule 62-296.414(2), F.A.C.

Unconfined Emissions from Truck Loading and Unloading, Hoppers, Storage and Conveying Equipment, Conveyor Drop Points, Roads, Parking Areas, Stock Piles, and Yards

- 1. Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfined emissions by:
 - 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
- 2. If reasonable precautions not being taken:
 - a. Did the inspector perform a general VE test (20% opacity)? ----- Yes No
 - b. If tested: (NA)% opacity. Were the visible emissions < 20% opacity? ----- N/A Yes No
 - c. What caused the problem(s) (if known)? NA

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? NA

 - 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? NA

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

Note: Permit Eligibility Part 3. (a)(b)(c)(d)(e) and Part 4 are not applicable for this facility at this time.

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

Note: Relocatable Plant Part 2. (a)(b)(c) and Part 3. (a)(b)(c) are not applicable for this facility at this time.

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? ----- N/A 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? ----- N/A Yes No

C. Mark Sumner

3/30/2012

Inspector's Name (Please Print)

Date of Inspection



March 2013

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Steve Castro, Plant Manager was on site. Lisa Swain, environmental consultant conducted an EPA Method 9 visual emission test of the plants two cement silos, fly ash silo, and weigh hopper (batcher) at the time of this inspection. No visual emissions were observed at the time of this inspection. During this test 26.77 tons of fly ash and 26.16 tons of type I and 26.87 tons of type II cement were loaded into the facilities three silos, and one truck was loaded with a full load at the weigh hopper. The results of this VE test must be submitted to the Department by May 14, 2012.

This facility has a C&W pulse jet bag house for each silo and a separate Vince Hagen dust collector for the weigh hopper. The metal frame supporting the weighhopper shroud has been repaired to ensure the dust from batching is collected by the dust collector. Each dust collector vent was observed at the time of this inspection, and no signs of excessive emissions were observed. The facility has well maintained records for fuel consumption by the vehicles (the plant is powered by the electricity power grid), and material batched on a monthly basis.

Dust control logs, bag house inspections logs, and BMP daily inspection logs were also available for review. The facility has wind breaks/binblock enclosures for the aggregate, and all stockpiles were stacked at the height of the enclosures to prevent wind erosion/entrainment of aggregate material. There is a closed block plant adjacent to this facility. According the the facility personnel it has not operated since the last inspection or in the last four years.