CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST

ARMS UPDATED

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 1010038 **DATE:** 07/24/2012 **ARRIVE:** 7:02am **DEPART:** 10:10am

FACILITY NAME: HUDSON PLANT

FACILITY LOCATION: 9301 DENTON AVE

HUDSON 34667-4340

OWNER/AUTHORIZED REPRESENTATIVE: JOHN WHITE* **PHONE:** (727)862-2239
Email: none **Mobile:**
CONTACT NAME: CHUCK JACKSON* **PHONE:** (727)862-2239
Email: none **Mobile:** (727)243-0774
ENTITLEMENT PERIOD: 6/14/2012 (effective date) / 6/14/2017 (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): Leroy Ludeker

   Brief Notes: _____

2. Is the Authorized Representative still JOHN WHITE*? ---------- ☒ 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 CHUCK JACKSON*? ---------- ☒ 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

11 –CCB Plant-plant#2,splitsilo,compart#2,w/individ.silotop b-hse subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION

(check ☑ only one box for each question)

1. Date of last inspection: ***new dust collector***
2. Past Visible Emissions (VE) tests: ***Initial VE Testing conducted today***
   a. Was a VE test performed within each of the past 4 calendar years? ---------- ☐ Yes ☐ No
   b. Has a VE test been performed yet within the current calendar year? ---------- ☐ 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: _____
   e. Was the VE test report filed with the compliance authority no later than 45 days after the test? ------ ☐ Yes ☐ No
   f. Did the report state the actual silo loading rate during emissions testing? ---------- ☐ Yes ☐ No
   g. What was the actual silo loading rate? _____ 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 ☐ No
   i. Did the test report state the actual batching rate during emissions testing? ---------- ☐ Yes ☐ 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?-- ☐ 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 ☑ only one box for each question)

1. Was a visible emissions test conducted by the facility for this unit during this site visit? ---------- ☒ Yes ☐ 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 0.00 % 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? 25 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? unknown tons/hour. What was the batching duration? 6 minutes.

2. **Was a visible emissions test conducted by the inspector for this unit during this site visit?** -------- ☐ Yes ☒ 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? 7775276

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

Wendy D. Akins	07/24/2012
Inspector's Name (Please Print)	Date of Inspection
Wendy D. Akins 2012.08.20 15:59:07 -04'00'	05/20/2014
Inspector's Signature	Approximate Date of Next Inspection

COMMENTS: Pre-inspection: On May 15, 2012, the SW District received notification of new equipment registration for this facility. On May 24, 2012, I contacted Mr. Leroy Ludeker to introduce myself as the facility's new compliance contact at the Department and provide compliance assistance for requirements in the facility's permit. Mr. Ludeker stated he was not aware that new equipment must be tested within 30 days of initial operation and supplied additional information which indicated that another B. E. T. ER Mix facility (1010490) also had new equipment recently installed. I advised Mr. Ludeker to schedule testing on all the new equipment as soon as possible. This testing will resolve failure to timely conduct initial testing on new equipment. Inspection Findings: The purpose of this inspection was to conduct an audit of initial Visible Emissions Test (VET) for new control equipment on Emission Unit No. 11(EU11). The new dust collector for EU11 was replaced in mid-May and was initially loaded on May 30, 2012. Initial testing for this new unit should have been conducted by June 29, 2012 per Rule 62-296.414(4)(a), of the Florida Administrative Code. VET was conducted on other emission units at this facility on this day. A full compliance inspection was not conducted on all emission units at this facility during this site visit. The pop-off valve released on the new dust collector at end of truck unloading less than one minute after the end of the VET. The facility immediately began addressing the issue by shutting

down pnuematic loading and resecuring pop-off valve. Visible emissions exceeding 5% were observed for less than 5 minutes coming from pop-off valve location. Mr. Leroy Ludeker, the facility representative sent a written report of malfunction to the Department by email on July 25, 2012. DEP Inspector was not in an appropriate location to conduct a proper Method 9 VET when emissions from pop-off valve occurred. This malfunction along with follow-up corrective actions have been documented and updated in the database. Photos were taken during this site visit and are attached to this report.

DIGITAL PHOTOGRAPHIC LOG

1. Facility Name: B. E. T. ER Mix, Inc. Hudson
2. County / AIRS ID No: 1010038--Pasco
3. Inspection Type: INS 2
4. Inspection Date: 07/24/2012
5. Date Photographic Log was completed: 08/8/2012
6. Type of Camera Used: Canon Power Shot SD400 Digital ELPH
7. Digital Recording Media: ScanDisk 256 MB SD Card
8. All Digital Photos Were Copied To: Hard Disk of Computer 143986 and to Digital Photographic Log
9. Original Copy Is Stored In/On: Hard disk of computer 143986
10. Were the photos altered?: NO ____ YES XXX explain yes: photo sizes were reduced to fit in this log.
11. Photographer: Wendy D. Akins Wendy D. Akins
12. Signature of Photographer: Wendy D. Akins 2012.08.20 15:58:31 -04'00'

Photo ID No: IMG_425 – B. E. T. ER Mix, Inc. Ready Mix Plant

Photo ID No: IMG_426 - B. E. T. ER Mix, Inc. Ready Mix Plant

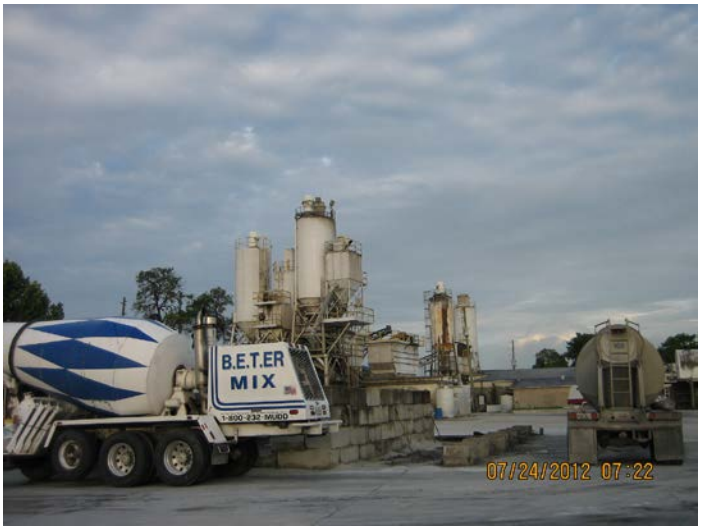

Photo ID No: IMG_427 – Photo shows location where Mr. Chris Stirrat conducted some of the Visible Emissions Testing.

Photo ID No: IMG_428 – Photo shows location where Mr. Chris Stirrat conducted some of the Visible Emissions Testing.

Photo ID No: IMG_429 – This photo shows a closer view of facility and includes B. E. T. ER Mix, Inc. Block Plant at this location.

Photo ID No: IMG _430 – Visible Emissions Testing location viewable with truck traffic passing.

Photo ID No: IMG_431 – 6 Dust Collector exhaust points are visible from this location.

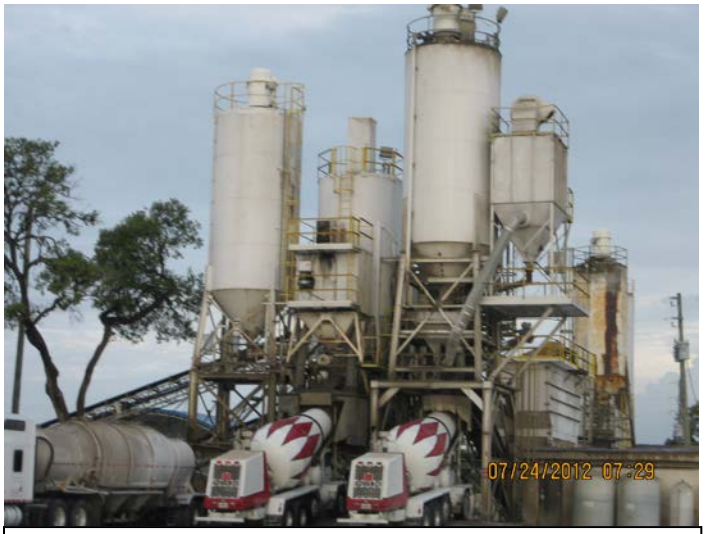

Photo ID No: IMG_432 – Loading 2 cement trucks and silo simultaneously.

Photo ID No: IMG_433 – Arrival of second truck for silo loading.

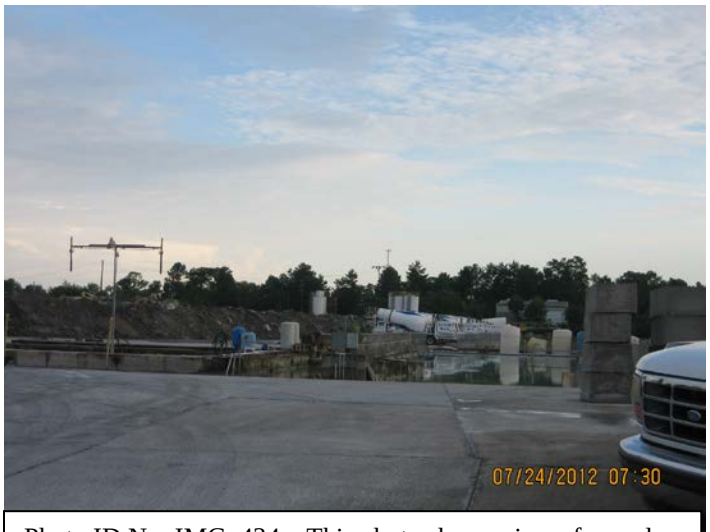

Photo ID No: IMG_434 – This photo shows view of paved roadway.

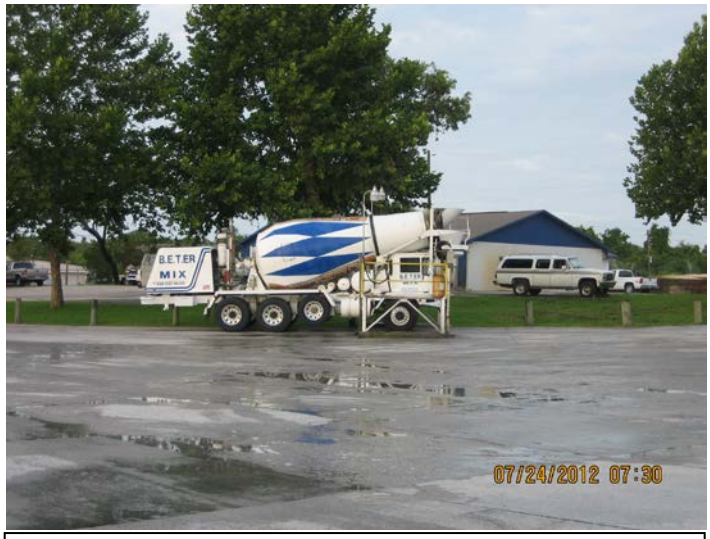

Photo ID No: IMG _435 – This photo shows adequate wetting of roadways/yard.

Photo ID No: IMG _436 – This photo shows adequate wetting of roadways/yard.

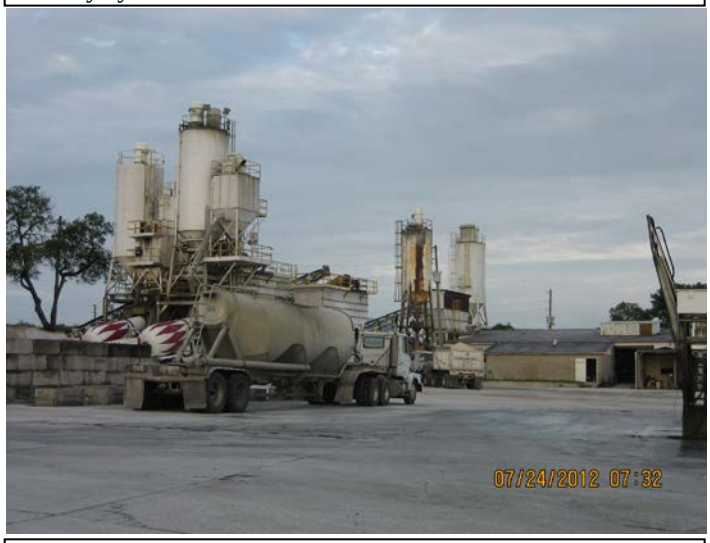

Photo ID No: IMG _437 – This photo shows truck traffic in motion, no fugitive particulate from truck traffic on site.

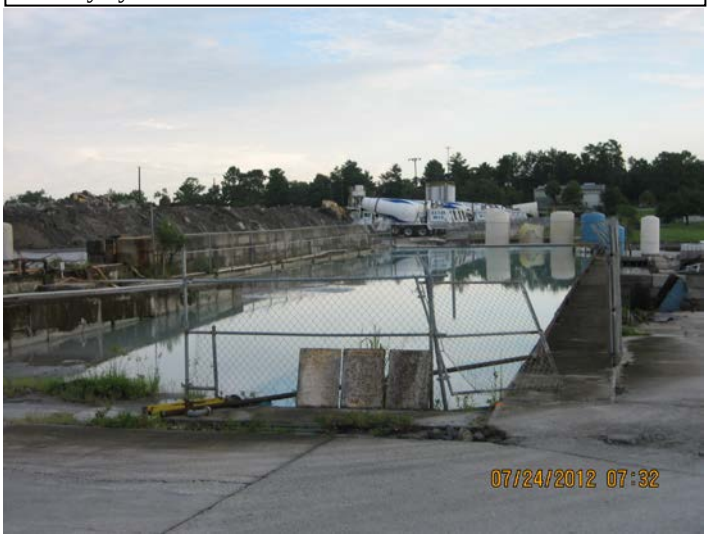

Photo ID No: IMG _438 – This photo shows a closer view of the wastewater pond.

Photo ID No: IMG _441 – This photo shows silo dust collector for small silo (Emission Unit No. 004)

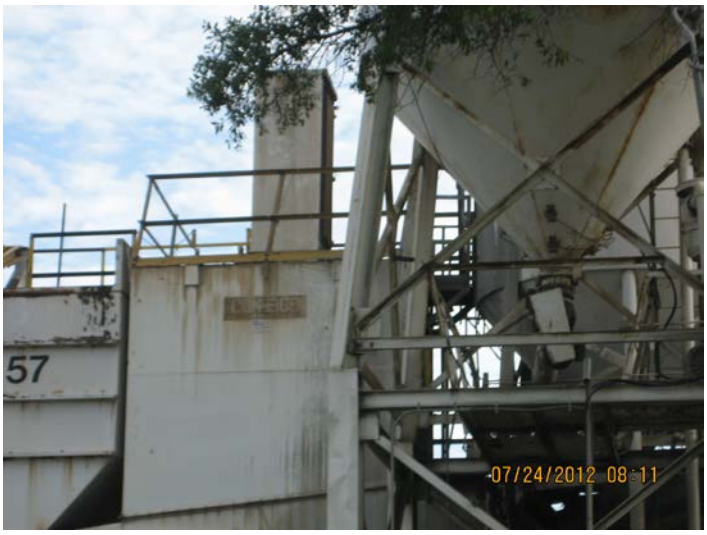

Photo ID No: IMG _442 – This photo shows a closer view of silo dust collector for small silo (Emission Unit No. 004)

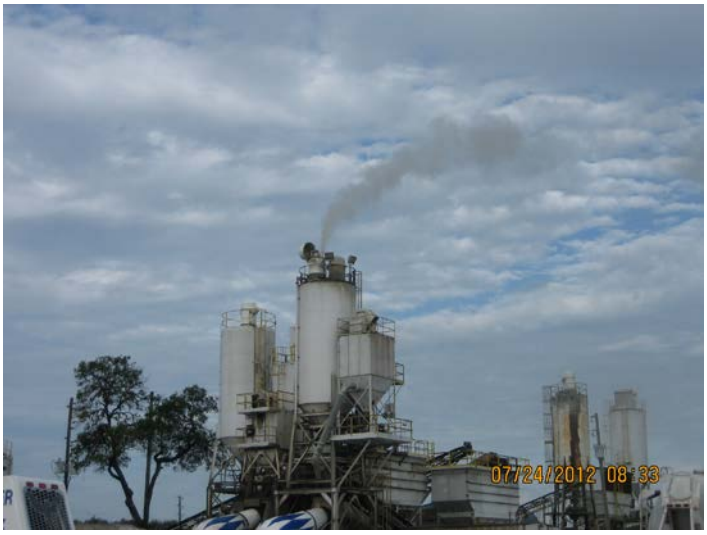

Photo ID No: IMG_447 – This photo shows flyash release from new dust collector for Emission Unit No. 11. This release quickly dissipated and lasted less than 6 minutes.

Photo ID No: IMG_448 – This photo shows a slightly zoomed view of flyash release from new dust collector for Emission Unit No. 11 and shows how quickly release began tapering off.

Photo ID No: IMG_449 – This photo is a close-up view of the Emission Unit No. 11 dust collector once release had stopped.

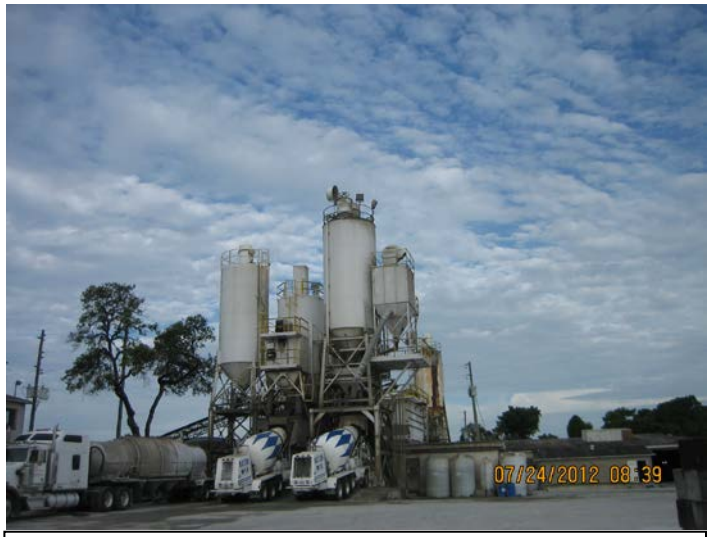

Photo ID No: IMG_450 – This photo shows a wide view of plant once flyash release stopped.

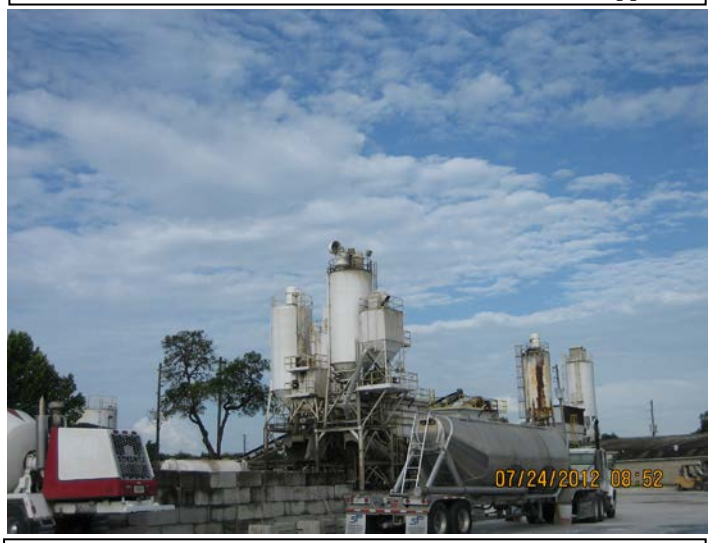

Photo ID No: IMG_452 – This photo shows a wide view of plant and a B. E. T. ER Mix employee inspecting EU11 dust collector.

Photo ID No: IMG_453 – This photo shows a zoomed view of plant B. E. T. ER Mix employee inspecting EU11 dust collector.

Photo ID No: IMG_455 – This photo shows a B. E. T. ER Mix employee resetting the EU11 dust collector.

Photo ID No: IMG_456 – This photo shows a close-up view of the B. E. T. ER Mix employee on top of EU11.

All photos taken on this day were not necessary for inclusion in this photo log.