



# Florida Department of Environmental Protection

Northwest District  
160 Governmental Center, Suite 308  
Pensacola, Florida 32502-5794

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Mimi A. Drew  
Secretary

December 8, 2010

*By Electronic Mail, Received Receipt Requested*  
csgjc@panhandle.rr.com

Mr. James E. Campbell, President  
Fort Walton Concrete, Inc.  
930 Campbell Road  
Century, Florida 32535

Dear Mr. Campbell:

On November 16, 2010, a Department representative with the Air Resource Management Program inspected your facility, ID 1310018. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was out of compliance at the time of the inspection for those items specifically noted in the inspection report. Please note that authority to operate this facility expired on June 5, 2010.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Carol Melton at 850/595-0616 or [carol.melton@dep.state.fl.us](mailto:carol.melton@dep.state.fl.us).

Sincerely,

Rick Bradburn  
Air Program Administrator

RB/cm/c

Enclosure

c: Wayne Simms, Fort Walton Concrete: [fwc.office@yahoo.com](mailto:fwc.office@yahoo.com)  
Judson Day, Bio-Tech Consulting Pensacola: [Judson@bio-techconsulting.com](mailto:Judson@bio-techconsulting.com)



# CONCRETE BATCHING PLANT



## COMPLIANCE INSPECTION CHECKLIST

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

<b>AIRS ID#:</b> 1310018	<b>DATE:</b> <u>11/16/10</u>	<b>ARRIVE:</b> <u>3:00PM</u>	<b>DEPART:</b> <u>3:10 PM</u>
<b>FACILITY NAME:</b> FORT WALTON CONCRETE - DEFUNIAK SPRINGS			
<b>FACILITY LOCATION:</b> HWY 90 & NORWOOD RD DE FUNIAK SPRINGS			
<b>OWNER/AUTHORIZED REPRESENTATIVE:</b>		<b>PHONE:</b>	
<b>Email:</b>		<b>Mobile:</b>	
<b>CONTACT NAME:</b> Wayne Simms		<b>PHONE:</b> (850)232-6611	
<b>Email:</b> fwc.office@yahoo.com		<b>Mobile:</b>	
<b>ENTITLEMENT PERIOD:</b> 6/5/2005 / 6/5/2010		<b>Facility may be operating without Entitlement!</b>	
(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): \_\_\_\_\_  
 Brief Notes: \_\_\_\_\_

2. Is the Authorized Representative still BARBARA WOOLLARD? -----  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 –CEMENT CONCRETE BATCH PLANT subject to Reasonable Precautions**

**PART I: FILE REVIEW PRIOR TO INSPECTION**

(check  only one box for each question)

1. Date of last inspection: 1/12/10
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: (\_\_\_\_\_)% opacity. Were the visible emissions < 20% opacity? -----  N/A  Yes  No  
 c. What caused the problem(s) (if known)? \_\_\_\_\_

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

(check  only one box for each question)

**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: (\_\_\_\_\_)% opacity. Were the visible emissions < 20% opacity? -----  Yes  No
  - c. What caused the problem(s) (if known)? \_\_\_\_\_

## 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

Carol Melton

11/16/10

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** This was an unannounced inspection. At the time of inspection, the facility was not operating and no facility personnel were on site. On November 15, 2010, I telephoned Fort Walton Concrete and left a message asking for a return call. The morning of November 16, 2010, Mr. Wayne Simms, Fort Walton Concrete, telephoned and indicated that he was not aware that the entitlement period for the DeFuniak Springs facility had expired. Mr. Simms also indicated the facility had operated since June 2010 or after expiration of the entitlement period. I explained that since the entitlement period has expired, the facility appears to be out of compliance for operating without obtaining appropriate authorization from the Department. I advised them not to operate until the facility's entitlement to operate is renewed. Mr. Simms indicated they needed to continue to operate the facility and would contact his consultant to renew the entitlement to operate. Upon request, I emailed Mr. Simms the web link to information

concerning the Air Resource Management's Air General (AG) Permit Registration Program and concrete batch plant registration form. On November 30, 2010 Mr. Judson Day, Bio-Tech Consulting Pensacola, Inc., telephoned and indicated that he had been hired by Fort Walton Concrete to renew the entitlement to operate for the DeFuniak facility and would submit the renewal soon. On December 3, 2010 Mr. Simms telephoned and asked if the facility was back in compliance. I explained that our records still indicate the entitlement for the facility has expired, and that the facility is out of compliance. I further explained that I plan to draft a warning letter requesting their help in resolving our concerns. Visible emissions tests were conducted at the facility on March 3, 2010 and results indicated compliance.