



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Northwest District
160 W Government St., Suite 308
Pensacola, Florida 32502-5740

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

November 13, 2012

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 October 23, 2012, 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 in minor non-compliance at the time of the inspection for failing to take reasonable precautions to control unconfined emissions from truck loading. Rule 62-296.414(2), Florida Administrative Code (F.A.C.), states that the owner or operator shall take reasonable precautions to control unconfined emissions from hoppers, storage and conveying equipment, conveyor drop points, truck loading and unloading, roads, parking areas, stock piles, and yards as required by paragraph 62-296.320(4)(c), F.A.C.

However, through this letter, the Department is exercising its enforcement discretion and will not pursue any additional air enforcement action at this time for the violation cited above. This decision is based on the following items:

- Once personnel were alerted to the presence of excess emissions, the facility was shut down until the cause could be determined and repairs made.
- An inspection of the drop point revealed that the control valve was outdated and needed replacement.
- The control valve has been replaced and a shroud has been ordered to enclose the area around the load hopper for additional protection against excess emissions.

A follow-up inspection will be conducted to confirm repairs have been completed and are effectively preventing excess emissions from the truck loading area.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850.595.0662 or e-mail jennifer.waltrip@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator

RB/jw/c
Enclosure

c: Zac Sims, Fort Walton Concrete: ftwal26@yahoo.com
John Thompson, Fort Walton Concrete: ftwal26@yahoo.com
Lynn Anderson, Fort Walton Concrete: ftwal26@yahoo.com



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1310018	DATE: <u>10/23/12</u>	ARRIVE: <u>10:36 AM</u>	DEPART: <u>11:07 AM</u>
FACILITY NAME: DEFUNIAK SPRINGS CONCRETE BATCH PLANT			
FACILITY LOCATION: 1 S NORWOOD RD DEFUNIAK SPRINGS 32435			
OWNER/AUTHORIZED REPRESENTATIVE: JAMES CAMPBELL		PHONE: (850)243-8112	
Email: csgjc@panhandle.rr.com		Mobile:	
CONTACT NAME: ZACHARY SIMS		PHONE: (850)243-8114	
Email: ftwal26@yahoo.com		Mobile: (850)685-0744	
ENTITLEMENT PERIOD: 1/15/2011 / 1/15/2016 (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): Mark Clements
 Brief Notes: _____

2. Is the Authorized Representative still JAMES CAMPBELL? ----- 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 ZACHARY SIMS? ----- 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-CCB Plant-2silos(1flyashbin&1cement)ea.w/silotophse 150 Bbl subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION (check only one box for each question)

1. Date of last inspection: 2/29/12

2. Past Visible Emissions (VE) tests:
 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: 3/13/12
- 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? 19 tons fly ash and 7 tons cement 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 _____ % 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? _____ 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? _____ tons/hour. What was the batching duration? _____ 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.

Emissions Unit Section

3 –CCB Plant-truck load-out w/spray-bar subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

(check only one box for each question)

- 1. Date of last inspection: 2/29/12
- 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

Jennifer Waltrip

10/23/12

Inspector's Name (Please Print)

Date of Inspection

April 2013

Approximate Date of Next Inspection

COMMENTS: On October 23, 2012, Department personnel conducted an unannounced annual air compliance inspection of the Fort Walton Concrete DeFuniak Springs concrete batch plant. The facility was in operation during the inspection and the Department would like to thank Mr. Mark Clements for his assistance during the inspection.

A truck was loaded during the inspection and a very noticeable plume of uncontrolled emissions was observed from the drop point to the truck (see attached photos). The spraybar was in operation and appeared to be operating properly. Rule 62-296.414(2), Florida Administrative Code (F.A.C.), states that the owner or operator shall take reasonable precautions to control unconfined emissions from hoppers, storage and conveying equipment, conveyor drop points, truck loading and unloading, roads, parking areas, stock piles, and yards as required by paragraph 62-296.320(4)(c), F.A.C.

Mr. Clements indicated there were plans to place a shroud over the load out area to help contain emissions and to improve the effectiveness of the spraybar. A letter outlining plans for reducing emissions was requested during the inspection.

On October 24, 2012, the Department received an e-mail from Fort Walton Concrete stating that the excess emissions were caused by an outdated control valve, which caused low performance on the open flow rate. The operator was unable to properly control the flow, which caused a buildup of materials in the weigh hopper and subsequent "bursts" yielding high dust rates. The plant has been shut down until the control valve can be replaced and will not reopen unless emissions are within prescribed regulations. The repairs are expected to be completed no later than October 29, 2012.



1 FWC DeFuniak ID No 1310018 - 10/23/12



3 FWC DeFuniak ID No 1310018 - 10/23/12



2 FWC DeFuniak ID No 1310018 - 10/23/12



4 FWC DeFuniak ID No 1310018 - 10/23/12



5 FWC DeFuniak ID No 1310018 - 10/23/12

Photos taken by J. Waltrip during inspection on 10/23/12