

Florida Department of Environmental Protection

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

Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

August 11, 2009

BY ELECTRONIC MAIL shay@jerkinsinc.com

Mr. Shay McCormick, President Jerkins, Inc. Post Office Box 428 Bonifay, Florida 32425

Dear Mr. McCormick:

On July 15, 2009, Department representatives with the Air Resource Management Program inspected your facility, ID 1330004. 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. However, the Department has concerns that the minimum loading rate required during visible emissions (VE) testing is not being achieved during testing. During the last VE test, conducted on February 17, 2009, the loading rate was 12.8 tons per hour. According to Rule 62-296.414(c), Florida Administrative Code, "visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice." Within 15 days of receipt of this letter, please notify this office as to why the minimum loading rate of 25 tons per hour is not being achieved during testing.

As a reminder, authority to operate this facility expires on April 10, 2010. To avoid lapse of authority to operate, an owner or operator intending to continue to use an air general permit must submit the proper registration form and processing fee at least 30 days prior to expiration of the facility's existing air operation permit or air general permit.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-8300, extension 1222 or Jennifer.Waltrip@dep.state.fl.us.

Sincerely,

Erica Mitchell

Air Compliance Supervisor

EM/jw/c Enclosure



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

FACILITY NAME: JERKINS, INC. FACILITY LOCATION: 1571 West Highway 90
FACILITY LOCATION: 1571 West Highway 90
CHIPLEY
OWNER/AUTHORIZED REPRESENTATIVE: SHAY MCCORMICK PHONE: (850)547-3651
CONTACT NAME: Pete Balcom PHONE: (850)638-1833
ENTITLEMENT PERIOD: 4/10/2005 / 4/10/2010 (effective date) (end date)
(effective date) (effe date)
PART I: <u>INSPECTION</u> <u>COMPLIANCE</u> <u>STATUS</u> (check ☑ only one box)
☐ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE
PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C. (check ☑ appropriate box(es))
Stack Emissions 1. Were visible emissions tests conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?

PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C. – (continued)				
(check ☑ appropriate box(es)				
Compliance Demonstration - (Rule 62-296.401(5)(i), F.A.C.)				
1. Is each dust collector exhaust point tested according to the visible emissions limiting standard as part of the annual compliance demonstration? (Rule 62-297.310(7)(a), F.A.C.)				
annual compliance demonstration? (Kule 62-297.510(7)(a), F.A.C.)				
New Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)				
2. Did this facility demonstrate: a) initial compliance no later than 30 days after beginning operation? □Yes □ No				
b) annual compliance within 60 days prior to each anniversary of the air general permit notification form				
submittal date?				
Existing Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)				
3. In order to demonstrate annual compliance, was an annual visible emissions test conducted 60days prior to				
the AGP Notification form submission, and within 60 days prior to each anniversary date? Yes No				
Test Reports – (Rules 62-213.440, F.A.C. and 62-297.310(8)(b), F.A.C.)				
4. Was the required test report filed with the department as soon as practical, but no later than 45 days after the				
test was completed? \Bar{Y}es \Bar{N}o				
PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.300(4)(c)2., F.A.C.				
(check ☑ appropriate box(es))				
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? (<i>Please check Donly one box.</i>)				
2. If this is a stationary concrete batching plant, is there one or more relocatable nonmetallic mineral processing plants using individual air general permits at the same location? (<i>If your answer to this question is YES</i> ,				
then proceed to questions 2.a), thru 2.d),) below.)				
a) Are there any additional nonexempt units located at this facility?Yes \Bigcup No				
b) Is the total combined annual facility-wide fuel oil usage of all plants less than 240,000 gallons per calendar year?				
calendar year? Yes No c) Is the quantity of material processed less than ten million tons per calendar year? Yes No				
d) Is the fuel oil sulfur content 0.5% by weight or less?				
3. Does the owner/operator of the concrete batching plant maintain a log book or books to account for:				
a) fuel consumption on a monthly basis?				
b) material processed on a monthly basis? Tyes No				
c) the sulfur content of the fuel being burned (Fuel supplier certifications)?				
PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414(2)(a) and (b), F.A.C. (continued)				
(check ☑ appropriate box(es))				
<u>Unconfined Emissions</u> – (Rule 62-296.320(4)(c), F.A.C.)				
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? \square Yes \square 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?				
b) use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck? Yes No				

PART IV: <u>SPECIAL CONDITIONS AND PROCEDUL</u> A. <u>New or Modified Process Equipment</u>	<u>RES</u> – Rule 62-210.300(4)(d)4., F.A.C.			
1. Since the last inspection has there been a) installation of any new process equipment?				
Jennifer Waltrip	7/15/09			
Inspector's Name (Please Print)	Date of Inspection	_		
Jennific Waltin	July 2010			
Inspector's Signature	Approximate Date of Next Inspection	_		

COMMENTS: A Department representative conducted an unannounced annual air program compliance inspection on July 15, 2009 at the Jerkins Concrete batch plant located in Washington County. Pete Balcom was available to assist during the inspection.

The plant has one cement storage silo which is equipped with a baghouse to control emissions. A spray bar and partical enclosure are used to control emissions while loading the trucks. Preventative maintenance inspections on the baghouse and spraybar are tracked and performed weekly.

A sprinkler system was installed to mitigate wind entrainment of particulater matter from stockpiles in the yard. However, the sprinkler system was damaged during recent construction to redirect stormwater. According to Mr. Balcom, repairs will be made soon. All stockpiles are stored without wall enclosures, which can cause a source of fugitive emissions. Please note that reasonable precautions should be taken to control unconfined emissions from truck loading and unloading areas, roads, parking areas, stock piles and yards.

The most recent annual visible emissions (VE) test was conducted on February 17, 2009. No emissions were observed during the 30-minute test. The documented loading rate was 12.8 tons per hour (tph). All VE tests for the past three years were conducted at approximately the same rate. Rule 62-296.414(c), Florida Administrative Code, states that visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice.

As a reminder, the Entitlement Period for this facility (authority to operate) expires on April 10, 2010. Please note that Rule 62-210.310(2)(c)2, F.A.C., requires the submittal of the proper registration form and processing fee at least 30 days prior to expiration of the facility's existing air general permit in order to avoid lapse of authority to operate.