

FLORIDA DEPARTMENT OF

**ENVIRONMENTAL PROTECTION** 

NORTHWEST DISTRICT OFFICE 470 HARRISON AVENUE PANAMA CITY, FLORIDA 32401 RICK SCOTT GOVERNOR

JENNIFER CARROLL LT. GOVERNOR

HERSCHEL T. VINYARD JR. SECRETARY

January 16, 2013

BY ELECTRONIC MAIL dellis@readymixusa.com

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

Dear Ms. Ellis:

On December 13, 2012, a Department representative with the Air Resource Management Program inspected the Ready Mix USA 1013 Cox Grade Road Concrete Batch Plant 630 ID 0050042. 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. Assistant Director

CDW/ms

Enclosure

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

	-	L MOIECIO	1	-
er age		VA	C.	1
F	LOR	IDA		

**CONCRETE BATCHING PLANT** 



## COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE:	ANNUAL (INS1, INS2)	COMPLAINT/I ARMS COMPL		Y (CI)		
AIRS ID#: 0050042 DA	TE: <u>12/13/2012</u>	ARRIVE: <u>2:00</u>		DEPART:	<u>4:00</u>	
FACILITY NAME: 10	13 COX GRADE RD					
FACILITY LOCATION	N: 1013 COX GRADE R	D				
	PANAMA CITY BEA	CH 32407				
OWNER/AUTHORIZE Email: dellis@ready CONTACT NAME: W Email: wileyw@read ENTITLEMENT PERIO	VILEY WILLOUGHBY dymixusa.com	esire Ellis	PHONE: Mobile: PHONE: Mobile:	(205)986-480 (205)314-9942 (850)785-193 (850)258-1634	2 4	
Facility Section         PART I: INSPECTION COMPLIANCE STATUS (check I only one box)         IN COMPLIANCE       MINOR Non-COMPLIANCE         SIGNIFICANT Non-COMPLIANCE       SIGNIFICANT Non-COMPLIANCE						
						]
	<b>RODUCTORY MEETING</b>				(check ☑ box for each	•
<ol> <li>Name(s) of facility representative(s): <u>Mike Bedwel</u></li> <li>Brief Notes: <u>The plant was in operation at the time of this inspection, and the annual Method 9 (VE) test was performed by Lisa</u></li> <li><u>Swain of HS&amp;E Resources.</u></li> </ol>						
<ol> <li>Is the Authorized Rep If no, who is?: <u>NA</u></li> </ol>	resentative still Desire Ellis?				Yes Yes	No
If different, did the fac 3. Is the facility contact s If no, who is?: <u>NA</u>	cility provide an administrative still WILEY WILLOUGHBY?	update within 30 days	?	XN/A	A Yes Yes	□No □No
<ol> <li>Will facility be condu- If yes, was the compli</li> </ol>	cting VE test(s) during today's ance authority notified at least	inspection? 15 days in advance?		DN/A	Yes X Yes	□No □No

## **Emissions Unit Section**

<u>1 – CCB Plant-3silos, ea w/baghouse, batcher/loadout w/central DC subject to Reasonable Precautions</u>			
PART I: FILE REVIEW PRIOR TO INSPECTION			
<ol> <li>Date of last inspection: <u>12/2/2010</u></li> <li>Did the emissions unit use reasonable precautions during the last inspection?  Yes If not: a. Did the inspector perform a general VE test (20% opacity)?</li></ol>	□ No □ No □ No		
PART II: FIELD OBSERVATIONS – Rule 62-296.414(2), F.A.C.	]		
<u><b>PART II: FIELD ODSERVATIONS – KUIE 02-290.414(2), F.A.C.</b></u>			
<u>Unconfined Emissions from Truck Loading and Unloading, Hoppers, Storage and Conveying Equipment, Conveyor Drop Points, Roads, Parking Areas, Stock Piles, and Yards</u>			
<ol> <li>Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfined emissions by:</li> </ol>			
<ul> <li>a. Management of roads, parking areas, stock piles, and yards, which shall include one or more of the following:</li> <li>1) paving and maintenance of roads, parking areas, stock piles, and yards? X Yes</li> <li>2) application of water or environmentally safe dust-suppressant chemicals when necessary to</li> </ul>	No		
control emissions? Yes 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	□ No		
particulate matter? Yes 4) reduction of stock pile height, or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles? Yes	∐ No □ 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 <u>not</u> being taken:			

. If reasonable precautions <u>not</u> being taken:	
a. Did the inspector perform a general VE test (20% opacity)?	No No
b. If tested: ( <u>NA</u> )% opacity. Were the visible emissions < 20% opacity?	No No
c. What caused the problem(s) (if known)? <u>NA</u>	

## **Facility Section (continued)**

CONFIRMATION OF GENERAL PERMIT ELIGIBILITY	(check 🗹	only one
	box for each	
<ol> <li>Does this facility keep records to show that it does not have the potential to emit:         <ul> <li>a. 10 tons per year or more of any hazardous air pollutant?</li> <li>b. 25 tons per year or more of any combination of hazardous air pollutants?</li> <li>c. 100 tons per year or more of any other regulated air pollutant?</li> </ul> </li> </ol>	Yes Xes	☐ No ☐ No ☐ No
<ol> <li>Does this facility include:         <ul> <li>a. Any emission units or activities not covered by the applicable air general permit (with the exception units and activities that are exempt from permitting pursuant to subsection Rule 62-210.300(3) or Rule 62-4.040, F.A.C.)?</li> <li>If YES, what non-exempt units or activities? <u>NA</u></li> </ul> </li> </ol>		🛛 No
<ul> <li>b. Any emissions units or activities authorized by another air general permit where such other air gene permit and this general permit specifically allow the use of one another at the same facility?</li> <li>If YES, what other general permit units or activities? <u>NA</u></li> </ul>		🛛 No
<ul> <li>3. Is the total combined annual facility-wide fuel usage of all plants less than or equal to:</li> <li>a. 275,000 gallons of diesel fuel?</li></ul>	<ul> <li>☐ Yes</li> <li>☐ Yes</li> <li>☐ Yes</li> <li>☐ Yes</li> <li>☐ Yes</li> </ul>	<ul> <li>□ No</li> <li>□ No</li> <li>□ No</li> <li>□ No</li> <li>□ No</li> </ul>
$\frac{0 \text{ gal diesel/yr} + 0 \text{ gal gasoline/yr} + 0 \text{ MM SCF nat. gas/yr} + 0 \text{ MM gal propane/yr}}{275,000 \text{ gal diesel/yr} 23,000 \text{ gal gasoline/yr}} 44 \text{ MM SCF nat. gas/yr} 1.3 \text{ MM gal propane/yr}}$	ne/yr	
4. Has the owner/operator maintained, available for inspection, site-wide records of monthly fuel consum for each consecutive 12-period for the past 5 years?	nption	🗌 No
GENERAL CONDITIONS	(check ☑ box for each	•
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
<ul> <li>a. Maintain the authorized facility in good condition?</li> </ul>	_	
<ul> <li>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?</li> <li>3. Has the owner or operator allowed you, as the duly authorized representative of the Department, access</li> </ul>	- 🛛 Yes	🗌 No
3. Has the owner or operator allowed you, as the duly authorized representative of the Department, acces to the facility at reasonable times to inspect and test and to determine compliance with the air general permit and Department rules?		🗌 No

RELOCATABLE PLANT:	(check ☑ box for each	
1. Is the facility: stationary 🖾; relocatable 🔄; or consisting of both stationary and relocatable 🗌 concrete batching and/or nonmetallic mineral processing plants? ( <i>If only stationary, skip the followin</i>		question)
<ul> <li>2. Is the relocatable concrete batching plant used to mix cement and soil for onsite soil augmentation or stabilization?</li></ul>	🗌 Yes	🗌 No
<ul> <li>a. Did the owner or operator notify the appropriate Department or Local Air Program by telephone,</li> <li>e-mail, fax, or written communication at least one business day prior to changing location?</li> <li>b. Did the owner or operator transmit a Facility Relocation Notification Form [DEP No. 62-210.900(</li> <li>to the Department or Local Air Program no later than five business days following a relocation?</li> </ul>	6)]	□ 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?	5)]	□ No
3. If the relocatable plant was co-located at a facility with a separate air construction or air operation per and the relocatable batch plant is not included as an emissions unit in that separate permit: <ul> <li>a. Was the relocatable batch plant being used for a non-routine purpose (i.e, there is no repeated usage If YES, what was the purpose?</li> </ul>		🗌 No
b. Were records kept by the owner/operator to indicate how long it was co-located at the permitted facility? If YES, were any periods more than 6 months in duration?	🗌 Yes 🗌 Yes	D No
Note: Relocatable Plant Part 2. (a)(b)(c) and Part 3. (a)(b)(c) are not applicable for this facility a	at this time.	
CHANGES	(check 🗹	•
Administrative Changes:	box for each	question)
<ol> <li>Were there any changes in the name, address, or phone number of the facility or authorized representa associated with a change in ownership or with a physical relocation of the facility or any emissions ur</li> </ol>		
operations comprising the facility; or any other similar minor administrative change at the facility? 2. If YES, did the facility provide written notification within 30 days of the change?\overline{\Box}N/A New or Modified Process Equipment or Change in Ownership:	- 🗌 Yes	⊠ No □ No
<ul> <li>Since the last registration form submittal has there been <ul> <li>a. Installation of any new process equipment?</li></ul></li></ul>	🗌 Yes 🗌 Yes	<ul> <li>⋈ No</li> <li>⋈ No</li> <li>⋈ No</li> <li>⋈ No</li> </ul>
<ol> <li>If the answer to any question 3a. – d. is YES, was a new registration form and the appropriate fee sub 30 days prior to the change?</li></ol>	omitted A 🗌 Yes	🗌 No

C. Mark Sumner

Inspector's Name (Please Print)

Mark San

Inspector's Signature

12/13/2012

Date of Inspection

December 2013

Approximate Date of Next Inspection

**COMMENTS:** Lisa Swain, environmental consultant for HS&E Resources conducted an EPA Method 9 visual emission test of the plant's cement silo, fly ash silo, and weigh hopper (batcher) on 12/13/2012. No visual emissions were observed at the time of this test. During this test 27.3 tons of fly ash and 27.3 tons of cement were loaded into the facilities two silos, and 1 yard was batched to a ready mix truck. The results of this VE test are due at the Department within 45 days of the test. This facility has a bag house for each silo and a separate dust collector for the weigh hopper. Each vent was inspected at the time of this inspection, and no evidence of previous dusting was observed. The facility has well maintained records for fuel consumption by the vehicles (the plant is powered by the electricity power grid), and material processed 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 maintained lower than the enclosures to prevent wind erosion/entrainment of aggregate material. The weigh hopper/batcher is equipped with an enclosure, chute, and a dust collector. The enclosure appeared in good contition, and no dusting was observed while the truck was loaded. No new or modified process equipment has been installed since the last inspection