FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

470 HARRISON AVENUE
PANAMA CITY, FLORIDA 32401

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

November 13, 2013

BY ELECTRONIC MAIL
wileyw@readymixusa.com

Mr. Wiley Willoughby
Operations Manager
Ready Mix USA, LLC Plant 630
Post Office Box 101868
Birmingham, Alabama 35210

Dear Mr. Willoughby:

Department personnel conducted a compliance inspection of the above-referenced facility on November 4, 2013. Based on the information provided during the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact C. Mark Sumner at 850/767-0046 or by e-mail at mark.c.sumner@dep.state.fl.us.

Sincerely,

Michael Mathews
Environmental Manager

MM/ms

Enclosure
c: Ms. Mary Beth Curle, FDEP Pensacola (mary.beth.curle@dep.state.fl.us)
Ms. Carol Melton, FDEP Pensacola (carol.melton@dep.state.fl.us)

CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

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

AIRS ID#: 0050042 **DATE:** 11/4/13 **ARRIVE:** 1:30 **DEPART:** 2:30

FACILITY NAME: 1013 COX GRADE RD

FACILITY LOCATION: 1013 COX GRADE RD

PANAMA CITY BEACH 32407

OWNER/AUTHORIZED REPRESENTATIVE: WILEY WILLOUGHBY **PHONE:** (205)986-4800
Email: wileyw@readymixusa.com **Mobile:** (205)314-9942
CONTACT NAME: WILEY WILLOUGHBY **PHONE:** (850)785-1934
Email: wileyw@readymixusa.com **Mobile:** (850)258-1634
ENTITLEMENT PERIOD: 3/6/2010 (effective date) / 3/6/2015 (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): WILEY WILLOUGHBY

Brief Notes: The plant was in operation at the time of this inspection, and the annual Method 9 (VE) test was performed by Lisa Swain of HS&E Resources.

2. Is the Authorized Representative still WILEY WILLOUGHBY? ---------- ☒ Yes ☐ No
If no, who is?: NA

If different, did the facility provide an administrative update within 30 days? ---------- ☒ N/A ☐ Yes ☐ No

3. Is the facility contact still WILEY WILLOUGHBY? ---------- ☒ Yes ☐ No
If no, who is?: NA

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-3silos,ea w/baghouse,batcher/loadout w/central DC subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

(check ☑ only one box for each question)

1. Date of last inspection: 12/13/12
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)? ---------- ☒ N/A ☐ Yes ☐ No
   b. If tested: (NA)% opacity. Were the visible emissions < 20% opacity? ------- ☒ N/A ☐ Yes ☐ No
   c. What caused the problem(s) (if known)? NA

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)? ---------- ☒ N/A ☐ Yes ☐ No
   b. If tested: (NA)% opacity. Were the visible emissions < 20% opacity? ---------- ☒ N/A ☐ Yes ☐ No
   c. What caused the problem(s) (if known)? NA

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? NA

   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? NA

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? ---------- ☒ N/A ☐ 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.)***

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? ---------- ☒ N/A ☐ 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? ---------- ☒ N/A ☐ Yes ☐ No

C. Mark Sumner	11/4/13
Inspector's Name (Please Print)	Date of Inspection
Mark Swa	11/2014
Inspector's Signature	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 11/4/2013. No visual emissions from the cement silo or fly ash silo were observed at the time of this test, but the and weigh hopper (batcher) malfunctioned and was not tested. A separate test for the weigh hopper (batcher) was done on 11/5/13. During the tests 26.56 tons of fly ash and 24.87 tons of cement were loaded into the facilities two silos, and 1 yard was batched to a ready mix truck. The results of thse VE tests 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, however, not all stockpiles were maintained lower than the enclosures to prevent wind erosion/entrainment of aggregate material. This was dicussed with the facility manager and corrective action was taken.
The weigh hopper/batcher is equipped with an enclosure, chute, and a dust collector. The enclosure appeared in good contition, but some dusting was observed while the truck was loaded. This was discussed with the facility manager ant the equipment was repaired. No new or modified process equipment has been installed since the last inspection.