



Florida Department of Environmental Protection

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

Northwest District Branch Office
630-3 Capital Circle Northeast
Tallahassee, Florida 32301

August 4, 2008

SENT VIA E-MAIL
Regular Mail Requested

James Brooks
Brooks Welding and Machine Shop
Brooks Concrete
1532 Coastal Highway
Panacea, Florida 32346

Dear Mr. Brooks:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The Air Program identification number for this facility is **1290007**. Your facility permit **expires on June 5, 2013**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the facility inspection results, the Tallahassee Branch Office reported a status of **In-Compliance** for your facility.

Note that your facility compliance status may be subject to further review by the District Program Office.

The assistance you provided is appreciated. You are encouraged to review the enclosed inspection checklist and its comments section. If you have any questions, your local contact is Tracy White at (850) 488-3704 or tracy.a.white@dep.state.fl.us.

Sincerely,

Marlane Castellanos
Branch Manager

MC/tw
Enclosures

cc: Rick Bradburn, FDEP, Pensacola
Mary Beth Curle, FDEP
Erica Mitchell, FDEP



CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST



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

AIRS ID#: 1290007	DATE: <u>7/24/2008</u>	ARRIVE: <u>9:15</u>	DEPART: _____
FACILITY NAME: BROOKS CONCRETE			
FACILITY LOCATION: 1532 COASTAL HWY PANACEA 32346			
OWNER/AUTHORIZED REPRESENTATIVE: JAMES BROOKS		PHONE: (850)984-5279	
CONTACT NAME:		PHONE:	
ENTITLEMENT PERIOD: 6/5/2008 / 6/5/2013 (effective date) (end date)			

PART I: INSPECTION COMPLIANCE STATUS (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.)?----- Yes No
2. Are emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment controlled to the extent necessary to limit visible emissions to 5 percent opacity?----- Yes No
3. 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, or at least at the minimum 25 tons per hour rate, unless such rate is unachievable in practice?----- Yes No
4. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? (If answer to this question is “Yes”, then continue on to questions 4.a) and 4.b) below. If answer is “No” then skip 4.a) and 4.b) and continue on to question 5.)----- Yes No
 - a) Was the batching operation in operation during the visible emissions test?----- Yes No
 - b) During the visible emissions test, was the batching rate representative of the normal batching rate and duration?----- Yes No
5. If emissions from the weigh hopper (batcher) operation are controlled by a dust collector, which is separate from the silo dust collector, are the visible emissions tests 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

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.)----- Yes No

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?----- Yes No

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 60 days 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?----- Yes No

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? (*Please check only one box.*)
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? (*If your answer to this question is YES, then proceed to questions 2.a), thru 2.d,) below.*)----- Yes No
- a) Are there any additional nonexempt units located at this facility?----- Yes No
- b) Is the total combined annual facility-wide fuel oil usage of all plants less than 240,000 gallons per 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?----- Yes No
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?----- Yes No
- b) material processed on a monthly basis?----- Yes No
- c) the sulfur content of the fuel being burned (Fuel supplier certifications)?----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414(2)(a) and (b), F.A.C. (continued)
(check appropriate box(es))

Unconfined Emissions – (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?----- 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

PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300(4)(d)4., F.A.C.

A. New or Modified Process Equipment

1. Since the last inspection 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 substantially different than that noted on the most recent notification form?----- Yes No
 - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, FAC) to the appropriate DEP or local program office?----- Yes No

Tracy White

7/24/2008

Inspector's Name (Please Print)

Date of Inspection



6-12 months

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

The inspection had a dual purpose. It was a routine compliance inspection, but also a follow-up inspection to the 5/10/2007 inspection where failure to take reasonable precautions to control yard dusts was observed.

On this inspection I met with Ross Langford and Susan Brooks. Mr. Langford assisted with the inspection. He showed me a new large water tank and PVC device that was stored behind the main office in the casting area. According to Mr. Langford, the tank is hoisted onto a dump truck, a PVC "spraybar" is attached to the tank, the tank is filled with water, then the truck is driven to the main yard and water applied when necessary (once/week on the dryer weeks).

Mr. Langford also explained that the facility has a contract with a local company to rent sweeper equipment to sweep the yard.

I observed the yard. The concrete portion to the left of the silo appeared to be much cleaner than last time. However the area next to the truck loading area (droppoint) near the equipment had some accumulation of materials.

However the yard was wet from a recent rain that had occurred earlier in the morning. No excessive emissions were noted.

The silos, their dust units and the batcher/droppoint and its associated baghouse were observed. The droppoint curtain had drop/lift flaps for the front and rear access of trucks. These flaps appear to be operated manually.

The equipment was not in operation during the inspection. No major problems were noted.

The last compliance testing on computer file was on 4/07/2008 for the three emission points. The 2007 test for silo #1,#2 was on 3/22/2007. Truck load out 6/18/2007.

Recommendations:

The non-compliance status from 5/10/2007 will be closed out in the computer records as a "CWOE" (compliance without enforcement) by this local Branch office. However the resulting non-compliance record will remain on file. Please maintain the yard in order to insure future compliance.