



# Florida Department of Environmental Protection

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

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

March 13, 2009

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. Your facility permit **expires on June 5, 2013**. The Air Program identification number for this facility is 1290007. 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](mailto: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:** 2/26/2009 **ARRIVE:** \_\_\_\_\_ **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**

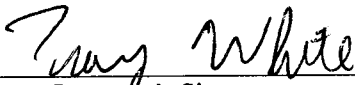
1. Since the last inspection has there been
- a) installation of any new process equipment?-----  Yes  No
  - b) alterations to existing process equipment without replacement?-----  Yes  No
  - c) replacement of existing equipment substantially different than that noted on the most recent notification 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

2/26/2009

Inspector's Name (Please Print)

Date of Inspection

  
Inspector's Signature

6-12 months

Approximate Date of Next Inspection

**COMMENTS:**

I arrived at the site with Danielle Melnick, FDEP IW section, to conduct a multi-media inspection. We met with L.B. Brooks, facility owner.

Ben Withers, Plant operator, then met with us and assisted with the inspection.

I observed the batch point curtain. The curtain was tattered and open at both ends (the drop point accomodates both front and rear loading trucks), however it was not in operation. The front flap appeared able to lower and close if needed.

The baghouse was still present and connected. The dust control units were still present on top of the two silos. The yard had an accumulation of some dust debris, but excessive emissions were not noted (no traffic). Mr. Withers explained that the baghouse is serviced once a month and that all the bags are replaced once a year.

Mr. Withers and we went to the site of the water tank assembly. Mr. Withers had modified the spray bar for improved performance. After Ms. Melnick had finished her inspection, we left the site. Upon departure, I noticed a large, cylindrical, upright incinerator in the equipment yard. Mr. Brooks said that was put there in storage and is no longer used.

A records review indicates that the last compliance testing for the two silos and baghouse was on April 7, 2008.

Recommendations:

The batch point curtain may need maintenance and/or repair. A mechanism to easily lower the front and back flaps (from a standing position on the ground, remote position, etc.) may be needed to insure proper dust control.

The yard may need more sweeping frequency to remove accumulated debris.