



NON-METALLIC MINERAL PROCESSING PLANTS



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0530046 DATE: 12-19-08 ARRIVE: 10:30 am DEPART: 11:43 am

FACILITY NAME: Vulcan Construction Materials, LP

**FACILITY LOCATION: 16313 Ponce De Leon Blvd
Brooksville, FL 34614**

OWNER/AUTHORIZED REPRESENTATIVE: _____ PHONE: _____

CONTACT NAME: Alan Pagels PHONE: (352) 344-6280

ENTITLEMENT PERIOD: From 9/25/06 To 9/25/11

PART I: INSPECTION COMPLIANCE STATUS (check ☒ only one box)

☐ IN COMPLIANCE ☒ MINOR Non-COMPLIANCE ☐ SIGNIFICANT Non-COMPLIANCE

PART II: DETERMINATION OF FACILITY TYPE/APPLICABILITY

(check ☒ only one box)

☒ **FOR FACILITIES SUBJECT TO:** (40 CFR Part 60, Subpart OOO, §60.670(a)(1))
(If you have checked ☒ this category, answer all questions INCLUDING those with **.)

Subject Facilities: (applicable fixed or portable facilities include each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station, crushers & grinding mills at hot mix asphalt facilities that reduce the size of non-metallc minerals embedded in recycled asphalt pavement & subsequent affected facilities up to, but not including the first storage silo or bin.)

☐ **FOR FACILITIES NOT SUBJECT TO:** (40 CFR Part 60, Subpart OOO, §60.670(a)(2), (b), (c), and (d))
(If you have checked ☒ this category, answer all questions EXCEPT those with **.)

Non-Subject Facilities: (includes all facilities in underground mines; stand-alone screening operations at plants w/o crushers or grinding mills; facilities not subject to subparts F (Portland Cement Plants) or I (Hot Mix Asphalt Facilities) of this part; fixed sand & gravel plants, & crushed stone plants w/capacities of 23 megagrams/hr (25 tons/hr) or less; portable sand & gravel plants, & crushed stone plants w/capacities of 136 megagrams/hr (150 tons/hr) or less; common clay plants, and pumice plants w/capacities of 9 megagrams/hr (10 tons/hr) or less.)

PART III: EMISSION STANDARDS – Chapter 62-210.310(5)(e), F.A.C.

(check ☒ appropriate box(es))

Stack Emissions - 40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.

- **1. Were visible stack emissions tests conducted during this site visit according to EPA Method 9 (40 CFR 60, Appendix A)?----- ☐ Yes ☐ No
- **2. Do stack emissions from any crusher, grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station or any other affected emission point:
- **a) exceed 7% percent opacity?----- ☐ Yes ☐ No
- **b) exceed the particulate matter standard of 0.05 grams per dry standard cubic meter (g/dscm)?----- ☐ Yes ☐ No
- **3. Do stack emissions from any baghouse that controls emissions from only an individual, enclosed storage bin exceed 7% percent opacity?----- ☐ Yes ☐ No

Visible Emissions - 40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.

- **1. Were visible emissions tests conducted during this site visit according to EPA Method 9 (40 CFR 60, Appendix A)?----- ☒ Yes ☐ No
- **2. Do visible emissions from any:
- **a) grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station or any other affected emission point exceed 10% percent opacity?----- ☐ Yes ☒ No
- **b) crusher without a capture system, exceed 15% opacity?----- ☐ Yes ☐ No
3. Pursuant to subparagraph 62-296.320(4)(b)1., F.A.C., are visible emissions from any crusher, grinding, screening operation, bucket elevator, transfer points on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station, or any other emission point **NOT** subject to 40 CFR Part 60, Subpart OOO, equal to or greater than 20% percent opacity?----- ☐ Yes ☒ No

Emission Points Enclosed in Buildings - 40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.

- **4. Is any crusher, grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station, or any other affected emission point enclosed in a building? (*If answer to question #4 is YES, then proceed to #4.a).*)----- ☐ Yes ☐ No
- **a) If enclosed in a building are the stack emissions discharged from a wet scrubbing control device? (*If answer to this question is NO, then proceed to the next question #4.b)1) & 2). If YES skip to #4.c).*)----- ☐ Yes ☐ No
- **b) If the stack emissions from enclosed emission points are not discharged from a wet scrubbing control device is:
- 1) the particulate matter in excess of 0.05 grams per dry standard cubic meter (g/dscm)?----- ☐ Yes ☐ No
- 2) the opacity greater than 7% percent?----- ☐ Yes ☐ No
- **c) Do the stack emissions from the baghouse(s) inside of the building(s) exceed 7% percent opacity?----- ☐ Yes ☐ No
- **5. Do visible emissions from any:
- **a) grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station or any other affected emission point exceed 10% percent opacity?----- ☐ Yes ☐ No
- **b) crusher without a capture system, exceed 15% opacity?----- ☐ Yes ☐ No

Wet Screening/Wet Mining Operations:

- **6. Are there any visible emissions discharges at the wet screening operations and subsequent screening operations, bucket elevators and belt conveyors that process saturated material in the production line up to the next crusher, grinding mill, or storage bin?----- ☐ Yes ☒ No
- **7. Are there any visible emissions discharges at the screening operations, bucket elevators, and belt conveyors in the production line downstream of wet mining operations, where such screening operations, bucket elevators, and belt conveyors process saturated materials up to the first crusher, grinding mill, or storage bin in the production line?----- ☐ Yes ☒ No

PART IV: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310, F.A.C.

(check ☒ appropriate box(es))

Compliance Demonstration – (Rule 62-210.310(5)(e)3., F.A.C.)

1. Is each affected emission point tested according to the visible emissions and stack emissions standards as part of the annual compliance demonstration? (Rule 62-210.310(5)(e)3.e., F.A.C.)----- ☒ Yes ☐ No

Compliance New Facilities – (Rule 62-210.310(5)(e)3., F.A.C.)

2. Did this facility demonstrate initial compliance no later than 30 days after beginning operation?----- ☒ Yes ☐ No

Compliance Existing Facilities – (Rule 62-210.310(5)(e)3., F.A.C.)

3. In order to demonstrate annual compliance, was an annual visible emissions test conducted within 365 days (annually thereafter) of the previous visible emissions compliance test?----- ☐ Yes ☒ No

Test Methods and Procedures – Chapter 62-297, F.A.C., 40 CFR 60.675, and 40 CFR Part 60, Appendix A adopted and incorporated by reference at Rule 62-204.800, F.A.C.

4. Were all referenced visible emissions tests conducted using EPA Method 9?----- ☒ Yes ☐ No
5. Were all referenced unconfined or fugitive emissions tests conducted using EPA Method 22?----- ☐ Yes ☐ No
6. Were all referenced stack emissions or particulate matter tests conducted using EPA Methods 5 or 17?----- ☐ Yes ☐ No

Reporting and Recordkeeping – (Rule 62-210.310(5)(e)3., F.A.C.) [Chapter 62-297, F.A.C. and 40 CFR Part 60.670 – 60.676, Subpart OOO, adopted and incorporated by reference at Rule 62-204.800, F.A.C.]

Facility and/or Equipment Replacement

- **7. Did the owner or operator submit to the Administrator, the following information about the replacement of existing facility and/or equipment:

**a) for a Crusher, Grinding Mill, Bucket Elevator, Bagging Operation, or enclosed truck, or Railcar Loading Station,

- **1) the rated capacity in megagrams or tons per hour of the existing facility being replaced and the rated capacity in tons per hour of the replacement equipment?----- ☐ Yes ☐ No

**b) for a Screening Operation,

- **1) the total surface area of the top screen of the existing screening operation being replaced and the total surface area of the top screen of the replacement screening operation?----- ☐ Yes ☐ No

**c) for a Conveyor Belt,

- **1) the width of the existing belt being replaced and the width of the replacement conveyor belt?----- ☐ Yes ☐ No

**d) for a Storage Bin,

- **1) the rated capacity in megagrams or tons of the existing storage bin being replaced and the rated capacity in megagrams or tons of replacement storage bins?----- ☐ Yes ☐ No

Performance/Compliance Testing

- **8. During the initial performance test, did the owner or operator record the measurements of both the change in pressure of the gas stream across the scrubber and the scrubbing liquid flow rate?----- ☐ Yes ☐ No

- **9. After the initial performance test of a wet scrubber, did the owner or operator submit semiannual reports to the Administrator of occurrences when the measurements of the scrubber pressure loss (or gain) and liquid flow rate differ by more than ± 30 percent from the averaged determined during the most recent performance test?----- ☐ Yes ☐ No

- **a) Were the reports postmarked within 30 days following the end of the second and fourth calendar quarters?----- ☐ Yes ☐ No

PART IV: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310, F.A.C. (Continued)

(check ☒ appropriate box(es))

- **10. Did the owner or operator of the facility submit written reports of the results of all performance tests conducted to demonstrate compliance with the particulate matter standards (40 CFR Part 60.672), opacity (using EPA Method 9 to demonstrate compliance with 40 CFR Part 60.672(b), (c), and (f)), and emission observations of transfer points enclosed in buildings (using EPA Method 22 to demonstrate compliance with 40 CFR Part 60.672(e))?----- ☐ Yes ☐ No

Process Changes

- **11. Does this facility have a screening operation, bucket elevator, and/or a belt conveyor system? *(If your answer to this question is **YES**, then answer either a)1) or a)2) below.)*----- ☒ Yes ☐ No
- **a) Did this screening operation, bucket elevator, and/or belt conveyor system:
- **1) originally process saturated material and switch to unsaturated material? *(Note: The unsaturated material handling processes would now be subject to the **10% opacity limit in 40 CFR 60.672(b)** and the emission test requirements of 40 CFR 60.11 and Subpart 000.)*----- ☐ Yes ☒ No
- **2) originally process unsaturated material and switch to saturated material? *(Note: The saturated material handling processes would now be subject to the **no visible emission limit in 40 CFR 60.672(h)**.) (If answer to 1) or 2) above is **YES** then proceed to question b) below.)*----- ☐ Yes ☒ No
- **b) Did the owner or operator submit a report of the process change within thirty (30) days following the change?----- ☐ Yes ☐ No

Notification Requirements

- **12. Was notification of the actual date of startup for each affected or combination of affected facilities submitted to the Administrator and postmarked within 15 days after such date?----- ☒ Yes ☐ No
- **a) Did the notification include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available?----- ☒ Yes ☐ No
- **b) For portable aggregate processing plants, did the notification of actual date of initial start up also include both the home office and the current address or location of the portable plant?----- ☐ Yes ☐ No

PART V: OPERATING REQUIREMENTS/CONTROL TECHNOLOGY – Rule 62-210.310, F.A.C.

(check ☒ appropriate box(es))

1. Is this facility a: 1) relocatable ☐; 2) stationary ☒ or does it have: 3) both, stationary and relocatable ☐ concrete batching and/or nonmetallic mineral processing plants? *(Please check ☒ only one box above.)*
(NOTE: If you have checked the box for relocatable go to questions 1.a) & 1.b). If you have checked the box for stationary go to question 1.c). If you have checked box #3, both, stationary and relocatable then answer all relocatable and stationary questions 1.a), 1.b), & 1.c) below, respectively.)
- a) If this is a **relocatable facility** was the Department notified by phone prior to this relocation, and was a Facility Relocation Notification form submitted within 1 business day following the relocation?----- ☐ Yes ☐ No
- b) If this is a **relocatable facility**, is it located at a mine and/or quarry, and processing only material from onsite deposits? *(If your answer to this question is **NO**, please proceed to question 1) below.)*----- ☐ Yes ☐ No
- 1) Does the owner or operator of this relocatable facility have a water suppression system with spray bars located at the feeder(s), the entrance, and the exit of the crusher(s), the classifier screens and the conveyor drop points?----- ☐ Yes ☐ No
- c) If this is a **stationary facility**, does the owner or operator of this stationary facility have a water suppression system with spray bars located at the feeder(s), the entrance, and the exit of the crusher(s), the classifier screens and the conveyor drop points?----- ☒ Yes ☐ No

PART V: OPERATING REQUIREMENTS/CONTROL TECHNOLOGY – Rule 62-210.310, F.A.C. (Continued)

(check ☒ appropriate box(es))

- **2. Does this facility incorporate the use of a wet scrubber to control emissions? (40 CFR Part 60, Subpart OOO adopted by reference Chapter 62-204.800, F.A.C.) *(If your answer to this question is YES, then proceed to questions 2.a) and 2.b), below.)*----- ☐ Yes ☒ No
- **a) Does the wet scrubber have continuous monitoring systems (CMS) for:
- **1) the measurement of the pressure loss of the gas stream through the scrubber?----- ☐ Yes ☐ No
- **2) the measurement of the scrubbing liquid flow rate to the wet scrubber?----- ☐ Yes ☐ No
- **b) Has each CMS been certified by the manufacturer and calibrated annually in accordance with the manufacturer's instructions and to the tolerances below?----- ☐ Yes ☐ No
- **1) ± 250 pascals ± 1 inch water gauge pressure for measuring pressure losses of the gas stream?----- ☐ Yes ☐ No
- **2) ± 5 percent of design scrubbing liquid flow rate?----- ☐ Yes ☐ No

PART VI: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(5)(b), 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 ☐
(Please check ☒ only one box.)
2. For any combination of stationary or relocatable nonmetallic mineral processing plants, located with stationary or relocatable concreted batching plants:
- a) Are there any additional nonexempt units located at this facility?----- ☐ Yes ☒ No
- b) Is the total combined annual facility-wide fuel usage of all plants less than or equal to:
- 1) 275,000 gallons of diesel fuel----- ☐ Yes ☐ No
- 2) 23,000 gallons of gasoline----- ☐ Yes ☐ No
- 3) 44 million standard cubic feet on natural gas----- ☐ Yes ☐ No
- 4) 1.3 million gallons of propane----- ☐ Yes ☐ No
- 5) or an equivalent prorated amount if multiple fuels are used onsite----- ☐ Yes ☐ No
3. Does the owner/operator of the nonmetallic mineral processing plant submitting this registration maintain a log book or books to account for fuel consumption on a monthly basis?----- ☐ Yes ☒ No
4. Is this relocatable nonmetallic mineral processing plant used to perform a routine function of a facility *(not a Title V source)* subject to regular air permitting, such as crushing recycled asphalt (rap) at an asphalt plant?----- ☐ Yes ☐ No
- a) If **YES**, does the regularly permitted facility air construction or air operation permit(s) provide for the operation of the nonmetallic mineral processing plant as an emission unit?----- ☐ Yes ☐ No
5. Is this relocatable nonmetallic mineral processing plant used to perform a non-routine activity, such as destruction of a building, at a regularly permitted facility *(not a Title V source)*?----- ☐ Yes ☐ No
- a) If **YES**, does it operate under the authority of its air general permit?----- ☐ Yes ☐ No

PART VII: REASONABLE PRECAUTIONS/EMISSION CONTROL MEASURES & TECHNOLOGY – Rule 62-210.310(5)(e)3.c., F.A.C.

(check ☒ appropriate box(es))

Unconfined Emissions – (Rule 62-296.320(4)(c), F.A.C.)

1. Does the owner /operator of the nonmetallic mineral processing plant take reasonable precautions to control unconfined emissions by:
- a) use of a water suppression system with spray bars located at the feeder(s), the entrance and exit of the crusher(s), the classifier screens, and the conveyor drop points?----- ☒ Yes ☐ No
 - b) 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
 - 5) landscaping and/or the planting of vegetation?----- ☐ Yes ☐ No
 - 6) the use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter?----- ☐ Yes ☐ No
 - 7) the enclosure or covering of conveyor systems?----- ☐ Yes ☐ No

PART VIII: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.310(2), 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) alteration of 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, F.A.C.) to the appropriate DEP or local program office?----- ☐ Yes ☐ No

COMMENTS: Visible Emissions testing was being conducted by Neil Lofgren of Koogler and Associates. This plant consists of a primary and secondary crusher. Material is wetted upon entering the initial hopper. Material is saturated throughout the process such that the only emission points requiring tests are at the crusher exits and at transfer points after the secondary crusher. Point 1: Primary Crusher, P2: Secondary Crusher, P3: secondary crusher to return belt, P4: return belt to recycled material belt. I observed the test for about 45 minutes and did not see any visible emissions. Review of the compliance folder indicates this facility last performed VE tests in 2006 (5/1 and 8/11). I called Alan Pagels and asked him to research if a test was done last year and if not to let me know why. This will likely be an MNC. Update: On January 7, 2009 I spoke with Neil Lofgren who was informed by Lori Sanville of Florida Rock that there was no VE test performed in 2007 for this facility. I called Lori (239-280-9156) and advised her of the violation.

Inspector's Name

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection