CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 7770268 **DATE:** 8/1/13 **ARRIVE:** 8:20 **DEPART:** 9:04

FACILITY NAME: FLORIDA ROCK DIVISION

FACILITY LOCATION: 1001 SR 630 W

MULBERRY 33860

OWNER/AUTHORIZED REPRESENTATIVE: LORI SANVILLE **PHONE:** (239)280-9156
Email: sanville@vmcmail.com **Mobile:** (239)280-9156
CONTACT NAME: CLARK VANDEVANDER* **PHONE:** (863)528-0490
Email: vandevanderc@vmcmail.com **Mobile:** (863)528-0490
ENTITLEMENT PERIOD: 1/13/2012 (effective date) / 1/13/2017 (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): Traci Johns

   Brief Notes: _____

2. Is the Authorized Representative still LORI SANVILLE? ---------- ☒ Yes ☐..No
   If no, who is?: _____

   If different, did the facility provide an administrative update within 30 days? ---------- ☐ Yes ☐..No
3. Is the facility contact still CLARK VANDEVANDER*? ---------- ☒ Yes ☐..No
   If no, who is?: _____

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? ---------- **(see comment)**

Emissions Unit Section

1 –CCB Plant-silo #1(cement)(former split now single)w/baghouse subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION (check ☑ only one box for each question)

1. Date of last inspection: 9/23/08
2. Past Visible Emissions (VE) tests: **(see comments)**
   a. Was a VE test performed within each of the past 4 calendar years? ---------- ☐ Yes ☒ No
   b. Has a VE test been performed yet within the current calendar year? ---------- ☐ Yes ☒ No
   c. If first year of operation, was a VE test performed within 30 days of commencing operation? ---------- ☒ N/A ☐ Yes ☐ No
   d. Date of last VE test: 12/4/2007
   e. Was the VE test report filed with the compliance authority no later than 45 days after the test? ------ ☒ Yes ☐ No
   f. Did the report state the actual silo loading rate during emissions testing? ---------- ☒ Yes ☐ No
   g. What was the actual silo loading rate? 27 tons/hour
   h. If weigh hopper(batcher) emissions controlled by the silo dust collector, did the report state whether or not batching occurred during emissions testing? ---------- ☒ N/A ☐ Yes ☐ No
   i. Did the test report state the actual batching rate during emissions testing? ---------- N/A
   j. What was the actual batching rate? _____ tons/hour
   k. Did the emissions unit demonstrate compliance with the 5% opacity limit during the last VE test?-- (See comment)
   If not, what was the problem (if known)? _____

PART II: STACK EMISSIONS from a silo, weigh hopper(batcher) or other enclosed storage and conveying equipment (check ☑ only one box for each question)

1. **Was a visible emissions test conducted by the facility for this unit during this site visit?** ---------- ☒ Yes ☐ No
   a. Was the visible emissions test conducted according to EPA Method 9? ---------- ☒ Yes ☐ No
   b. The visible emission test resulted in an opacity of unknown % for the highest six-minute average.
   c. Did the visible emissions test demonstrate compliance with the 5% opacity limit? ---------- ☒ Yes ☐ No
   If not, what was the problem (if known)? _____
   d. 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? --- ☒ Yes ☐ No ☐ N/A – silo not loaded during inspection.
   e. If silo loaded, was the minimum loading rate of 25 tons/hour achievable in practice? ---------- ☐ Yes ☐ No
   f. What was the silo loading rate? unknown tons/hour
   g. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? --- ☐ Yes ☒ No
   If YES, then continue on to questions g.1) – g.3) below. If answer NO, then skip g.1) – g.3) and go to h.
   1) Was the weigh hopper (batcher) in operation during the visible emissions test? ---------- ☐ Yes ☐ No
   2) During the visible emissions test, was the batching rate representative of the normal batching rate and duration?---------- ☐ Yes ☐ No
   3) What was the batching rate? _____ tons/hour . What was the batching duration? _____ minutes
   h. 1) If emissions from the weigh hopper (batcher) operation are controlled by a dust collector which is separate from the silo dust collector, was the visible emissions test of the weigh hopper (batcher) dust collector conducted while batching at a rate that is representative of the normal batching rate and duration? **(See Comment)**
   2) What was the batching rate? _____ tons/hour. What was the batching duration? _____ minutes.
2. **Was a visible emissions test conducted by the inspector for this unit during this site visit?** -------- ☐ Yes ☒ No
   a. Was the visible emissions test conducted according to EPA Method 9? ---------- ☐ Yes ☐ No
   b. The visible emission test resulted in an opacity of _____ % for the highest six-minute average.
   c. Did the visible emissions test demonstrate compliance with the 5% opacity limit? ---------- ☐ Yes ☐ No
   d. What was the process rate? _____ tons/hour.

Emissions Unit Section

2 –CCB Plant-silo #2 (slag/flyash) w/baghouse subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION (check ☑ only one box for each question)

1. Date of last inspection: 9/23/08
2. Past Visible Emissions (VE) tests:
   a. Was a VE test performed within each of the past 4 calendar years? ---------- ☐ Yes ☒ No
   b. Has a VE test been performed yet within the current calendar year? ---------- ☐ Yes ☒ No
   c. If first year of operation, was a VE test performed within 30 days of commencing operation? ---------- ☒ N/A ☐ Yes ☐ No
   d. Date of last VE test: 12/4/07
   e. Was the VE test report filed with the compliance authority no later than 45 days after the test? ------ ☒ Yes ☐ No
   f. Did the report state the actual silo loading rate during emissions testing? ---------- ☒ Yes ☐ No
   g. What was the actual silo loading rate? 33 tons/hour
   h. If weigh hopper(batcher) emissions controlled by the silo dust collector, did the report state whether or not batching occurred during emissions testing? ---------- ☒ N/A ☐ Yes ☐ No
   i. Did the test report state the actual batching rate during emissions testing? ---------- ☐ Yes ☒ No
   j. What was the actual batching rate? _____ tons/hour
   k. Did the emissions unit demonstrate compliance with the 5% opacity limit during the last VE test?-- ☒ Yes ☐ No
   If not, what was the problem (if known)? _____

PART II: STACK EMISSIONS from a silo, weigh hopper(batcher) or other enclosed storage and conveying equipment (check ☑ only one box for each question)

1. **Was a visible emissions test conducted by the facility for this unit during this site visit?** ---------- ☒ Yes ☐ No
   a. Was the visible emissions test conducted according to EPA Method 9? ---------- ☒ Yes ☐ No
   b. The visible emission test resulted in an opacity of unknown % for the highest six-minute average.
   c. Did the visible emissions test demonstrate compliance with the 5% opacity limit? ---------- ☒ Yes ☐ No
   If not, what was the problem (if known)? _____
   d. 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? --- **(See Comment)**
   e. If silo loaded, was the minimum loading rate of 25 tons/hour achievable in practice? ---------- ☐ Yes ☒ No
   f. What was the silo loading rate? Approx. 21.3 tons/hour
   g. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? --- ☐ Yes ☒ No
   If YES, then continue on to questions g.1) – g.3) below. If answer NO, then skip g.1) – g.3) and go to h.
   1) Was the weigh hopper (batcher) in operation during the visible emissions test? ---------- ☐ Yes ☐ No
   2) During the visible emissions test, was the batching rate representative of the normal batching rate and duration?---------- ☐ Yes ☐ No
   3) What was the batching rate? _____ tons/hour . What was the batching duration? _____ minutes
   h. 1) If emissions from the weigh hopper (batcher) operation are controlled by a dust collector which is separate from the silo dust collector, was the visible emissions test 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
   2) What was the batching rate? _____ tons/hour. What was the batching duration? _____ minutes.
2. **Was a visible emissions test conducted by the inspector for this unit during this site visit?** -------- ☐ Yes ☒ No
   a. Was the visible emissions test conducted according to EPA Method 9? ---------- ☐ Yes ☐ No
   b. The visible emission test resulted in an opacity of _____ % for the highest six-minute average.
   c. Did the visible emissions test demonstrate compliance with the 5% opacity limit? ---------- ☐ Yes ☐ No
   d. What was the process rate? _____ tons/hour.

Emissions Unit Section

4 –CCB Plant-truck loadout w/water spray ring/halo bar subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

(check ☑ only one box for each question)

1. Date of last inspection: 9/23/08
2. Did the emissions unit use reasonable precautions during the last inspection? ---------- (See comments)
   If not: a. Did the inspector perform a general VE test (20% opacity)? ---------- ☐ Yes ☐ No
   b. If tested: (_____)% opacity. Were the visible emissions < 20% opacity? ------- ☐ N/A ☐ Yes ☐ No
   c. What caused the problem(s) (if known)? _____

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? ---------- (See comment)
      2) application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions? ---------- (See comment)
      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? ---------- (See comment)
      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)? ---------- ☐ Yes ☐ No
   b. If tested: (_____)% opacity. Were the visible emissions < 20% opacity? ---------- ☐ Yes ☐ No
   c. What caused the problem(s) (if known)? _____

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? _____

   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? _____

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? ☒ 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.)***

2. Is the relocatable concrete batching plant used to mix cement and soil for onsite soil augmentation or stabilization? ---------- ☐ Yes ☒ No

   (If YES, answer 2. a and 2 .b; if NO, answer question 2.c below.)

   a. Did the owner or operator notify the appropriate Department or Local Air Program by telephone, e-mail, fax, or written communication at least one business day prior to changing location? --------- ☐ Yes ☐ No

   b. Did the owner or operator transmit a Facility Relocation Notification Form [DEP No. 62-210.900(6)] to the Department or Local Air Program no later than five business days following a relocation? ---- ☐ Yes ☐ 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? --- (See comment)

3. If the relocatable plant was co-located at a facility with a separate air construction or air operation permit, and the relocatable batch plant is not included as an emissions unit in that separate permit:

   a. Was the relocatable batch plant being used for a non-routine purpose (i.e, there is no repeated usage)? ☐ Yes ☐ No
      If YES, what was the purpose?

   b. Were records kept by the owner/operator to indicate how long it was co-located at the permitted facility? ---------- ☐ Yes ☐ No
      If YES, were any periods more than 6 months in duration? ---------- ☐ Yes ☐ No

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? ---------- ☐ 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? ---------- ☐ Yes ☐ No

Max Grondahl	8/1/2013
Inspector's Name (Please Print)	Date of Inspection
Grondahl_M Aug 7 2013 8:02 AM	8/1/2018
Inspector's Signature	Approximate Date of Next Inspection

COMMENTS: A short notice visible emissions (VE) test was permitted by FDEP SWD since this plant does not operate regularly and is not expected to continue operation for very long. The VE test was conducted by Traci Johns of Vulcan Materials. The last VE test conducted for this facility was on 12/4/2007. It had been shut down continuously since July 2008 until resuming operation in July 2013. Weigh hopper and batching emissions are uncontrolled. Truck load out emissions are controlled by a water spray halo. The VE test conducted on EU 002 was not performed at a loading rate above 25 tons per hour. The EU 002 silo was empty the morning of the test, but the plant needed to operate to fill orders in the morning prior to the test. The driver loaded one pod (approx 8 tons) into the silo before the test started. As a result there were two pods remaining (about 16 tons) to conduct the test with. I observed the driver unloading at 9 psi during the test which is typical, but it took 45 minutes to unload. I did not have the final calculation when I left the site, but it appears the loading rate was about 21.3 tons per hour (16 tons in 45 minutes). I discussed the low loading rate with Traci Johns and Clark Vandevander. The facility may be able to retest EU 002, but they are not certain how much work they will receive and how long the plant will remain active. I suggested that SWD may not require a retest if it is determined the plant will return to a long term reserve shutdown status. If necessary, compliance assistance plan will be implemented upon submittal of the final test report. No visible emissions were observed during testing of EU 001 and EU 002.

The last inspection conducted in 2008 was done while the facility was out of service. This facility is electric and does not use fuel other than for vehicles. This plant is permitted as a relocatable, but it is permanently anchored and has never been moved. No fugitive dust emissions were observed on site. The property is unpaved. Outside of the plant area, the property is a tall grass pasture. Sprinklers were in operation at the aggregate stock piles.