CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

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

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 0950148 **DATE:** 5/3/11 **ARRIVE:** 1:12 PM **DEPART:** 3:30 PM

FACILITY NAME: EAST ORLANDO

FACILITY LOCATION: 7400 NARCOOSSEE ROAD

ORLANDO 32822-

OWNER/AUTHORIZED REPRESENTATIVE: DAVID GUILLAUME **PHONE:** (770)392-5300
Email: **Mobile:**
CONTACT NAME: HANK BELCHER, REGION OPERATIONS MANAGER **PHONE:** (407)947-2789
Email: **Mobile:** (863)559-5829
ENTITLEMENT PERIOD: 12/12/2007 / 12/12/2012
(effective date) (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): DAVID GUILLAUME, VICE PRESIDENT

   Brief Notes: _____

2. Is the Authorized Representative still SIGURD BO? ---------- ☐ Yes ☒ No
   If no, who is?: DAVID GUILLAUME, VICE PRESIDENT

   If different, did the facility provide an administrative update within 30 days? ---------- ☒ Yes ☐ No
3. Is the facility contact still JOYCE KENDRICK? ---------- ☐ 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? ---------- ☒ Yes ☐ No

Emissions Unit Section

1 –CONCRETE BATCH PLANT subject to 5% Opacity Limit

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

1. Date of last inspection: 10/22/09
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: 10/22/09
   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? 31.8 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 6 % 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)? CDC began to emit dust approximately 19 minutes into test.

   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? ~30 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? N/A tons/hour . What was the batching duration? N/A 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? ~ 30 tons/hour.

Emissions Unit Section

2 –FLYASH SILO subject to 5% Opacity Limit

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

1. Date of last inspection: _____
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: _____
   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? _____ 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 _____ % 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? _____ 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.

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? --- ☐ Yes ☐ No

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

Norma Ali	5/3/11
Inspector's Name (Please Print)	Date of Inspection
	5/3/12
Inspector's Signature	Approximate Date of Next Inspection

COMMENTS: Inspector Norma Ali, reviewing the facility's file noticed that the facility didn't test on 2010. There are two VE notification notices on file, one for October 21, 2010, which was cancelled due to extensive road construction at the entrance to the property and a taker cannot safely drive onto the property. Second VE schedule notification was also cancelled, according to the AQM's compliance test schedule. According to Mr. Moss, the facility has not operated for a year, due to slow business.

Inspector Norma Ali met with Mr. Junior Moss, Plant Manager, and Noah Handley, consultant from Arlington Environmental Services, to audit a visual emission compliance test. The test was delayed due to an error from the dispatcher, who sent a tanker with fly ash from a different distributor and it was sent back. Another tanker was requested from the proper distributor (Stanton

Energy Plant). To be able to test the central dust collector which controls the emission of all three silos (cement, slag, fly ash and emissions generated from batching/truck loading), it was necessary to have all three tankers loading at the same time. The rest was schduled for 1:30 PM. Test started at 2:50 PM end at 3:20 PM. At minute 19, emissions were observed coming from the CDC. The inspector mentioned to the consultant and he didn't reply, so the inspector continued reading observing 5 to 15% opacity readings. At minute 27 the emission appeared to decrease considerably. The highest opacity observed by the inspector was 6% during a 6-minute average. By the time the inspector was getting ready to leave, emissions were observed coming from the vent of at least 30 percent opacity and emissions were observed from top of the most northern silo (full). The inspector approached the consultant to let him know the silo was leaking, he asked the driver loading up that silo to stop. Mr. Moss, Plant Manager, was there also and the inspector told him that they need to fix the problem with the central dust collector and reschedule the test. Consultant from Arlington Environmental, Noah Handley, conducting the VE Compliance test, asked the inspector "How come?" When the inspector tried to show him the pictures, that had just been taken, he said, he was going to talk to Ilka Bundy, about it. The inspector told them she was there just to audit the VE. She'll write the report and my supervisor will make the decision. The inspector was unable to determine the loading rate, due to the fly ash silo started leaking from the top and it was stopped approximately at minute 33-34 from the time it started loading up. The other two tankers continued loading, emissions observed from CDC vent were above permit limit of 5%. Due to the consultant had scheduled another VE test on a different facility. The inspector was not able to stay to observe the rest of the silo loading process.

Loads:
Cement 26.82 tons
Slag 27.03 tons
Fly Ash 27.37

Pictures attached.

Mr. Moss mentioned that the Authorized representative is Hank Belcher, Region Operations Manager. There is no communication on file to notify OCEPD about this change.