



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

Facility: Woodruff and Sons, Inc. District: Southwest
DBA/Site Name: Soil Cement Plant #2
Address: Relocatable, FL Contact Phone: 941-756-1871
Arms No: 7775055 001 Permit No: 7775055-004-AG
Expiration Date: 9/17/2012
Renewal Date: 8/18/2012
Test Date:

EMISSION UNIT DESCRIPTION: Relocatable ARAN ASR-280 Soil Cement Plant Soil Cement Plant with cement storage silo controlled by a Model DLM V30/15 baghouse

INSPECTION DATE: May, 17, 2012
INSPECTION COMPLIANCE STATUS (check [] only one box)
[X] In Compliance; [] Minor Non-Compliance; [] Significant Non-Compliance

PART I: General Review:

1. Permit File Review [X] Yes [] No
2. Introduction and Entry [X] Yes [] No
Comments: Brennan Farrington, co inspector and I met on site with the facility manager, Bruce Hoffman, Mike Houghton, and the Environmental Engineering consultant Ryan Fetter
3. Is the Authorized Representative still Bruce Woodruff? [X] Yes [] No
Comments: Mr. Bruce Woodruff is still the authorized Representative as listed in the GCPI system.
4. Is the facility contact still Bruce Woodruff? [X] Yes [] No
Comments: Yes, but not on site, Bill Gleason was also facility contact. Bruce Hoffman were site manager.
5. If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [X] Yes [] No
[62-210.310(2)(d), F.A.C.]

PART II: TESTING REQUIREMENTS - Rule 62-296.414, F.A.C.

(check [] appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Compliance Demonstration

- 1. [] New Facilities / [X] New Process Equipment - (permitted pursuant to Rule 62-296.414(4)(a), F.A.C., Air General Permits) Did this facility demonstrate initial compliance no later than 30 days after beginning operation? [X] Yes [] No
2. [] Existing Facilities - (permitted pursuant to Rule 62-296.414(4)(a), F.A.C., Air General Permits) In order to demonstrate annual compliance, was an annual visible emissions test conducted on each dust collector exhaust point within 365 days (annually thereafter) of the previous visible emissions compliance test? [X] Yes [] No
Temp shutdown-since 3/25/2010
Test Reports
3. Do the submitted visible emission tests demonstrate compliance with the 5 percent opacity limit? [X] Yes [] No
The last visible emission test resulted in an opacity of 0% for the highest six minute average.
[62-296.414(1) F.A.C.]
4. Was the department notified at least 15 days prior to the test? [X] Yes [] No
5. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed? [X] Yes [] No
6. Was the facility visible emissions test(s) conducted according to EPA Method 9? [X] Yes [] No
7. 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,

PART II: TESTING REQUIREMENTS – Rule 62-296.414, F.A.C.

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

- unless such rate is unachievable in practice? [62-296.414(3), F.A.C.] ----- Yes No
8. Are emissions from a weigh hopper (batcher) operation controlled by the silo dust collector? (If answer to this question is "Yes", then continue on to questions 8.a) and 8.b) below. If answer is "No" then skip to question 9.)----- Yes No
- a) Was the batching operation in operation during the visible emissions test? [62-296.414(3)(c), F.A.C.] ----- Yes No
- b) During the visible emissions test, was the batching rate representative of the normal batching rate and duration? [62-296.414(3)(c), F.A.C.] ----- Yes No
9. 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 while batching at a rate that is representative of the normal batching rate and duration? [62-296.414(3)(d), F.A.C.] ----- N/A No
10. Was a visible emissions test(s) conducted by the inspector during this site visit according to EPA Method 9?----- Yes No
- a) The visible emission test resulted in an opacity of 0 % for the highest six minute average.
- b) Did the test indicate the facility is operating in compliance with the 5% opacity standard? ----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(5)(b), F.A.C.

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

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. For any combination of stationary or relocatable concrete batching plants, located with other concrete batching plants or nonmetallic mineral processing plants:
- a) Are there any additional nonexempt units located at this facility? [62-210.310(5)(b)4.a., F.A.C.] ----- Yes No
- b) Is the total combined annual facility-wide fuel usage of all plants less than or equal to the fuel usages listed below: [62-210.310(5)(b)4.b., F.A.C.]----- Yes No
- 1) 275,000 gallons of diesel fuel – usage equals 9 3,600 gallons
- 2) 23,000 gallons of gasoline – usage equals _____ gallons
- 3) 44 million standard cubic feet on natural gas – usage equals _____ cubic feet
- 4) 1.3 million gallons of propane – usage equals _____ gallons
- 5) or an equivalent prorated amount if multiple fuels are used onsite – usage equals _____ % of all fuels
3. Does the owner/operator of the concrete batching plant submitting this registration maintain records to account for site-wide fuel consumption for each calendar month and each consecutive twelve (12) months, and are these records available for Department inspection for a period of at least five (5) years? [62-210.310(5)(b)4.d., F.A.C.] ----- Yes No
- Relocation Notification** - (Rule 61-210.310(5)(b)3.b., F.A.C.)
1. Is the relocatable concrete batching plant used to mix cement and soil for onsite soil augmentation or stabilization?—(if your answer is YES, please proceed to 1. a) thru 1.b) below) ----- Yes No
- a) Did the owner or operator notify the Department by telephone, e-mail, fax, or written communication at least one (1) 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 no later than five (5) business days following a relocation? ----- Yes No
- If your answer to number 1. above is NO, proceed to 2. below**
2. Did the owner or operator transmit a Facility Relocation Notification Form (DEP No. 62-210.900(6)) at least five (5) business days prior to relocation? ----- Yes No

PART IV: Unconfined Emissions - 62-296.414(2)

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

1. Does the owner /operator of the concrete batching plant take reasonable precautions to control unconfined emissions ----- Yes No
- Which of the following methods are used:
- 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

PART IV: Unconfined Emissions - 62-296.414(2)

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- 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 V: General Procedure Requirements and Conditions

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

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? [62-210.310(2)(d), F.A.C.] ----- N/A No

Permit Effective Period – [62-210.310(3)(a), F.A.C.]

- 1. Is the general permit for this facility still within the 5 year effective period? ----- Yes No
- 2. Did the facility submit the new re-registration form at least 30 days prior to permit expiration? ----- N/A No

New or Modified Process Equipment or Change in Ownership

- 1. Since the last registration form submittal has there been [62-210.310 (2)(b)2]
 - 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) Change in ownership----- Yes No
- If any of the answers to 1a) – 1d) is **Yes**, a new registration form and appropriate fee should have been submitted 30 days prior to the change.----- Yes No

Noncompliance Notice: - [62-210.310(3)(i), F.A.C.]

- 1. Did the facility have any instances where they were unable to comply with or will be unable to comply with any condition or limitation of the air general permit? ----- Yes No
If the answer is **Yes**, proceed to a) and b).
 - a) Did the owner or operator provide immediate notification to the Department? ----- Yes No
 - b) Did the notification include:
 - 1. A description of and cause of noncompliance?----- Yes No
- 2. The period of noncompliance, including dates and times; or if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance? ----- Yes No

PART VI: Comments

O&M Plan

The pollution control equipment shall be operated and maintained in accordance to the operation and maintenance (O&M) plan. The O&M plan shall include, but is not limited to:

- (1) Operating parameters of the pollution control device;
- (2) Time table for the routine maintenance of the pollution control device as specified by the manufacturer;
- (3) Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation;
- (4) A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises of the permit applicant;
- (5) A record log which will indicate, at a minimum:
 - a. When maintenance and observations were performed;
 - b. What maintenance and observations were performed; and
 - c. Who performed said maintenance and observations?
 - d. Acceptable parameter ranges for each operational check. [Pinellas County Code, Subsection 58-128]

Reviewed records for the months of review daily records on site maintained by Mike Houghton. The records show the hours of operation, and the amount of product processed and fuel usage since 4/25/12 to 5/17/12.

Comments: This unit has not been in operation over the past 12 months has been shutdown. This unit had been in temporarily shutdown for more than a year since, 10/15/08, FDEP inspected 3/25/2010, and the unit was not operational a that time.

<i>The notification for testing was submitted by Environmental Engineering Consultants on 4/24/12 for 5/20/12.</i>
<i>This was 26 days prior to testing. Test was cancelled 5/10/12 for equipment repair. The environmental engineer consultant</i>
<i>Ryan Fetter called on 5/16/12 for test rescheduled for 5/17/12. The facility was inspected and emission unit until tanker arrived.</i>
<i>The unit is used for the treatment of lead contamination of soil in Saw grass Park. The silo was loaded with a Alkaline Mixture</i>
<i>known as Terrabond.(See MSD sheet in file) The facility received 25,520 lbs of product which was loaded within one hour at the rate</i>
<i>of 12.76 tons/hour. This product is used to treat the lead contaminated soil, so can be reused on site.</i>
<i>Air quality staff observed pneumatic loading and operations activates diesel generator operation. A VE test was performed by staff.</i>
<i>The resulting opacity was 0%. The unit diesel engine was in operation during the loading to assist in loading of material and to</i>
<i>operate baghouse. The 10 filter bag -baghouse had been maintenance checked prior to loading. The daily maintenance of the</i>
<i>emission unit was by Mike Houghton, and observed his daily records kept on site. I contacted the Woodruff facility for monthly</i>
<i>records. (See attached). This unit's diesel fuel usage is low for last 12 months has not been in operation. The maintenance was</i>
<i>Performed prior to the units operation and the records showed?</i>
<i>Exit Interview: I informed Mr. Hoffman the emission unit appeared to be in compliance as observed during the VE testing</i>
<i>No emissions from the baghouse vent were observed.</i>

Shea Jackson
Inspector's Name

5/17/2012
Date of Inspection

Inspector's Signature

N/A
Approximate Date of Next Inspection

Woodruff and Sons, Inc. Soil Cement Plant #2

Relocatable,



Project Id: 82977 **Permit No:** 7775055-004-AO **Arms Number:** 5055 001

Inspector: Shea Jackson **Inspection Date / Time:** 5/17/2012 / _____

Source (EU): Relocatable ARAN ASR-280 Soil Cement Plant Soil Cement Plant with cement storage silo controlled by a Model DLM V30/15 baghouse

Description: [This is the relocatable baghouse with hopper, conveyor and pug mill for treatment and loading of soil for batching into trucks on site.]

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Inspector: Shea Jackson **Inspection Date / Time:** 5/17/2012 / _____
Source (EU): Relocatable ARAN ASR-280 Soil Cement Plant Soil Cement Plant with cement storage silo
controlled by a Model DLM V30/15 baghouse
Description: [the fan and vent for the baghouse was located on top of the silo.]

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Inspector: Shea Jackson **Inspection Date / Time:** 5/17/2012 / _____

Source (EU): Relocatable ARAN ASR-280 Soil Cement Plant Soil Cement Plant with cement storage silo controlled by a Model DLM V30/15 baghouse

Description: [The diesel engine operates the unit for control of baghouse and operation of pug mill and conveyor.]

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Inspector: Shea Jackson **Inspection Date / Time:** 5/17/2012 / _____
Source (EU): Relocatable ARAN ASR-280 Soil Cement Plant Soil Cement Plant with cement storage silo controlled by a Model DLM V30/15 baghouse
Description: [The control panel and meter for recording the tons processed during the units operations]

Woodruff and Sons, Inc. Soil Cement Plant #2

Relocatable,



Project Id: 82977 **Permit No:** 7775055-004-AO **Arms Number:** 5055 001
Inspector: Shea Jackson **Inspection Date / Time:** 5/17/2012 / _____
Source (EU): Relocatable ARAN ASR-280 Soil Cement Plant Soil Cement Plant with cement storage silo controlled by a Model DLM V30/15 baghouse
Description: [the tanker operator starting up loading of the terrabond into the storage silo prior to the performance of VE test.]