

# Florida Department of Environmental Protection

Northwest District Office 2353 Jenks Avenue Panama City, Florida 32405-4389 Governor

Jennifer Carroll

Rick Scott

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr. Secretary

April 27, 2011

BY ELECTRONIC MAIL suecu@readymixusa.com

Ms. Sue Cummings Environmental Manager Ready Mix USA, LLC Post Office Box 101868 Birmingham, Alabama 35210

Dear Ms. Cummings:

On March 30 2011, a Department representative with the Air Resource Management Program inspected the Ready Mix USA Marianna Concrete Batch Plant ID 7770024. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those items specifically noted in the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact C. Mark Sumner at 850/767-0046, or <a href="mark.c.sumner@dep.state.fl.us">mark.c.sumner@dep.state.fl.us</a>.

Sincerely,

Sally M. Cooey

Panama City Branch Administrator

SMC/ms

Enclosure

c: Ms. Mary Beth Curle, FDEP Pensacola (mary.beth.curle@dep.state.fl.us)

Ms. Carol Melton, FDEP Pensacola (carol.melton@dep.state.fl.us)

Mr. Wiley Willoughby, Operations Manager (wileyw@readymixusa.com)



## **CONCRETE BATCHING PLANT**



### COMPLIANCE INSPECTION CHECKLIST

INSPECTION TYPE: ANNUAL (INS1, INS2) COMPLAINT/DISCOVER RE-INSPECTION (FUI) ARMS COMPLAINT NO							
AIRS ID#: 7770024 DATE: 3/30/2011 ARRIVE: 10:56	DEPART: <u>11:42</u>						
FACILITY NAME: MARIANNA COUCH READY MIX USA							
FACILITY LOCATION: 2834 CALEDONIA ST							
MARIANNA 32448-4407							
OWNER/AUTHORIZED REPRESENTATIVE: ERIN CHRISTIE Email: ErinC@readymixusa.com CONTACT NAME: WILEY WILLOUGHBY Email: wileyw@readymix.com ENTITLEMENT PERIOD: 2/19/2010 / 2/19/2015 (effective date) (end date)	E: (850)785-1934						
Facility Section							
PART I: INSPECTION COMPLIANCE STATUS (check ✓ only one box)  ☐ IN COMPLIANCE ☐ MINOR Non-COMPLIANCE ☐ SIGNIFICAL	NT Non-COMPLIANCE						
PART II: ONSITE INTRODUCTORY MEETING	(check ☑ only one box for each question)						
1. Name(s) of facility representative(s): Mike Bedwell							
Brief Notes: I met Mike Bedwell on-site at 10:56 and spent approximatly 50 minutes inspecting this facility.							
2. Is the Authorized Representative still ERIN CHRISTIE?	Yes \(\sigma\)No						
If different, did the facility provide an administrative update within 30 days?3. Is the facility contact still WILEY WILLOUGHBY?							
4. Will facility be conducting VE test(s) during today's inspection?							
Note: Part II 4. is not applicable for this facility at the time of this inspection.							

## Emissions Unit Section 1 –CCB Plant-2cement silos,2aggr hoppers,1sand & 1 weigh hopper subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION		
<ol> <li>Date of last inspection: 2/27/2009</li> <li>Did the emissions unit use reasonable precautions during the last inspection?</li></ol>		☐ No ☐ No ☐ No
PART II: FIELD OBSERVATIONS – Rule 62-296.414(2), F.A.C.  Unconfined Emissions from Truck Loading and Unloading, Hoppers, Storage and Conveying Equipment, Conveyor Drop Points, Roads, Parking Areas, Stock Piles, and Yards		
<ol> <li>Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfined emissions by:</li> <li>Management of roads, parking areas, stock piles, and yards, which shall include one or more of the fo         <ol> <li>paving and maintenance of roads, parking areas, stock piles, and yards?</li> <li>application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions?</li> <li>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?</li> <li>reduction of stock pile height, or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles?</li> </ol> </li> <li>b. Use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck?</li> </ol>	llowing:  Yes  Yes  Yes  Yes	<ul> <li>No</li> <li>No</li> <li>No</li> <li>No</li> <li>No</li> <li>No</li> <li>No</li> </ul>
<ul> <li>2. If reasonable precautions <u>not</u> being taken: <ul> <li>a. Did the inspector perform a general VE test (20% opacity)?</li> <li>b. If tested: (<u>NA</u>)% opacity. Were the visible emissions &lt; 20% opacity?</li> <li>c. What caused the problem(s) (if known)? <u>NA</u></li> </ul> </li> <li>Note: Part II 2. (a)(b)(c) are not applicable for this facility at this time.</li> </ul>	☐ Yes ☐ Yes	☐ No ☐ No

## **Facility Section (continued)**

CO	ONFIRMATION OF GENERAL PERMIT ELIGIBILITY	(ah		mlr. on o
-			eck 🗹 c or each q	
		DOVIC	or each q	uestion)
1.	Does this facility keep records to show that it does not have the potential to emit:		* 7	□ N.
	a. 10 tons per year or more of any hazardous air pollutant?			∐ No
	b. 25 tons per year or more of any combination of hazardous air pollutants?			∐ No
	c 100 tons per year or more of any other regulated air pollutant?	$\boxtimes$	Yes	∐ No
2	Does this facility include:			
۷.	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	O1		
	Rule 62-4.040, F.A.C.)?	- I	Yes	⊠ No
	If YES, what non-exempt units or activities? NA	Ш	105	Z 1,0
	<u></u>			
	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? <u>NA</u>			
3	Is the total combined annual facility-wide fuel usage of all plants less than or equal to:			
٥.	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
	, , , , , , , , , , , , , , , , , , ,		•	
	gal diesel/yr + gal gasoline/yr + MM SCF nat. gas/yr + MM gal propa		≤ 1.00?	
	275,000 gal diesel/yr 23,000 gal gasoline/yr 44 MM SCF nat. gas/yr 1.3 MM gal propane	ie/yr		
4	TI d	. 4		
4.	Has the owner/operator maintained, available for inspection, site-wide records of monthly fuel consum for each consecutive 12-period for the past 5 years?	iption	Vac	$\square$ No
	for each consecutive 12-period for the past 5 years?	- Ш	Yes	∐ No
	Note: Permit Eligibility Part 3. (a)(b)(c)(d)(e) and Part 4 are not applicable for this facility at this	s time.		
GI	ENERAL CONDITIONS	(ch	eck 🗹 o	only one
			or each q	-
1	Here the according to a property allowed the aircommention of any air pollution control daying or allowed			
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:		103	Z 110
	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	S		
	to the facility at reasonable times to inspect and test and to determine compliance with the air general permit and Department rules?	_		☐ No

RELOCATABLE PLANT:	(check ☑ only one	
1. Is the facility: stationary □; relocatable ☒; or consisting	of both stationary and relocatable box for each question)	
concrete batching and/or nonmetallic mineral processing p	lants? (If only stationary, skip the following question 2.)	
2. Is the relocatable concrete batching plant used to mix ceme		
soil for onsite soil augmentation or stabilization?	Yes No	
(If YES, answer 2. a and 2 .b; if NO, answer question 2.c b		
a. Did the owner or operator notify the appropriate Departi		
e-mail, fax, or written communication at least one busin		
b. Did the owner or operator transmit a Facility Relocation		
to the Department or Local Air Program no later than five. Did the owner or operator transmit a Facility Relocation	• • • • • • • • • • • • • • • • • • • •	
to the appropriate Department or Local Air Program at 1		
to the appropriate Department of Local Air 110grain at 1	cust five business days prior to refocution.	
3. If the relocatable plant was co-located at a facility with a s	eparate air construction or air operation permit,	
and the relocatable batch plant is not included as an emissi		
a. Was the relocatable batch plant being used for a non-rou	itine 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	v long it was	
co-located at the permitted facility?		
If YES, were any periods more than 6 months in dura	ation? Yes No	
Note: Relocatable Plant Part 2. (a)(b)(c) and Part 3. (a)	(b)(c) are not applicable for this facility at this time.	
<u>CHANGES</u>	(check <b>☑</b> only one	
	box for each question)	
Administrative Changes:		
1. Were there any changes in the name, address, or phone nur		
associated with a change in ownership or with a physical representations comprising the facility; or any other similar min		
2. If YES, did the facility provide written notification within		
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 repla	cement? Yes No	
c. Replacement of existing equipment with equipment that		
d. A change in ownership?	Yes No	
4. If the answer to any question 3a. – d. is YES, was a new r		
30 days prior to the change?		
Note: Changes Part 4 is not applicable for this facility a	at this time.	
		_
C. Mark Sumner	March 30, 2011	
Inspector's Name (Please Print)	Date of Inspection	
	Date of hispection	
44	Date of hispection	
$MI \leq$	Date of hispection	
Mark Sen		
Mark Sen	March 2012	

**COMMENTS:** Mike Bedwell, Plant Manager was on site. Lisa Swain, environmental consultant for HS&E Services last conducted an EPA Method 9 visual emission test of the plant's cement silo, fly ash silo, and weigh hopper (batcher) on August 5, 2010. No visual emissions were observed at the time of this test. During this test 26 tons of fly ash and 27 tons of cement were loaded into the facilities two silos. The results of this VE test were submitted to the Department and reviewed on August 12, 2010.

This facility has a separate dust collector for each silo, and a spray bar with a metal shroud for the weigh hopper to ensure the dust from batching is controlled. No trucks were batching at the time of this inspection, but the operator turned on the spray bar and all sprinkler heads appeared to operate as designed. Each dust collecter vent was observed at the time of this inspection, and no signs of excessive emissions were observed. The facility has well maintained records for fuel consumption by the vehicles (the plant is powered by the electricity power grid), and material batched on a monthly basis.

Dust control logs, bag house inspections logs, and BMP daily inspection logs were also available for review. The facility has wind breaks/binblock enclosures for the aggregate, and all stockpiles were stacked at the height of the enclosures to prevent wind erosion/entrainment of aggregate material. A review of the recent batching records revealed that this plant has been averaging approximately 50 yards of concreter batched per day for the last couple months.