



CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST



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

Facility: Jobsite Concrete, Inc. District: Southwest
DBA/Site Name: ADDRESS: 13650 66th Street North Largo, FL CONTACT PHONE: 727-530-0691
ARMS NO: 7775153 001 PERMIT NO: 7775153-004-AG Expiration Date: 12/13/2017
Renewal Date: 11/13/2017 Test Date: 12/1/2000

EMISSION UNIT DESCRIPTION: Relocatable Concrete Batch Plant: One 300 barrel cement silo, with emissions controlled by a Belgrade Steel Tank Company "Belle Style Dust House" The control device has 150 square feet on bag area, and the bags are shaken for cleaning

INSPECTION DATE: 4/10/13 INSPECTION COMPLIANCE STATUS (check [] only one box)
[] In Compliance; [X] 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: I arranged and met on-site met with operator Paul Stiffler who answered questions, provided documentation, and filled his concrete truck for my observation.
3. Is the Authorized Representative still: Rick Kinsler? [X] Yes [] No
Comments: Unit was re-registered on 12/13/12 changing owners to Jobsite Concrete Inc. from Rush Concrete, Inc. Mr. Kinsler is the correct Authorized Representative. The e-mail address is: rkjobsite@aol.com
4. Is the facility contact still: Rick Kinsler? [X] Yes [] No
Comments: The e-mail address is: rkjobsite@aol.com
5. If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [] 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 / [] 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? [] Yes [] No
2. [X] 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? [] Yes [X] No
See Part VI: Comments
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, conducted on 2/26/13 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? [62-297.310(4)(a)9. F.A.C.] [] Yes [X] No
See Part VI: Comments
5. Was the required test report filed with the department as soon as practical, but no later than 45 days after the

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)

- test was completed? [62-297.310(8)(b)] ----- Yes No
6. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C.] ----- 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, 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.] - ----- Yes No

Note: There is no batching operation that occurs with the permitted silo configuration. Separated materials (cement, and 2 aggregates) are loaded into a truck and kept separate until the truck unloads at the end use location. Batching is done by the truck via an auger at the use location.

10. Was a visible emissions test(s) conducted by the inspector during this site visit according to EPA Method 9? ----- Yes No
- Note: A VE was conducted during the inspection of a truck load-out operation.**
- a) The visible emission test resulted in an opacity of 8.3 % for the highest six minute average.
- b) Did the test indicate the facility is operating in compliance with the 5% opacity standard? ----- Yes No

Note: The activity observed (truck load-out) requires a 20% opacity limit and the facility appears to be operating in compliance with that limit.

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 _____ 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 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.] ----- Yes 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? ----- Yes 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 12/1/11 to 3/10/13

Comments:

No V.E. test was performed in 2012. Unit was re-registered on 12/13/12 changing owners from Rush Concrete, Inc. to Jobsite Concrete, Inc. (Permit #: 7775153-004-AG) A test was originally notified to occur on 11/29/12 (under the old owner) but no test or cancellation was received. Another test was scheduled for 1/30/13 (under the re-registered new owner) but did not occur because of scheduling conflicts between the cement delivery and the testing consultant. A test did occur during the next silo loading on 2/26/13

A waiver of the notification 15 days prior to the when the date on which the formal compliance test is to begin was granted to the facility twice due to operational limitations resulting in infrequent silo loading activities and testing opportunities. The facility had been attempting to coordinate its required test as soon as possible.

A citizen dust complaint was received at Pinellas County Air Quality Division (PCAQD) on 4/9/13. Operator Paul Stiffler described what occurred while the silo was being loaded on 4/9/13. Mr. Stiffler explained that when the tanker began to load the silo, the clamped truck load-out chute was forced open and allowed cement dust to be emitted from this chute. He stated that he tanker driver immediately shut down the cement loading; they reattached the load-out chute correcting the problem, and were able to resume loading the silo without emissions. Mr. Stiffler stated that the reason the chute opened was because the silo was totally empty which created a situation where the pressure from the filling tanker was uninhibited and too strong for the chute to stay closed. I observed that the truck load-out chute was kept closed by rolling it up and attaching it to a pipe with a spring clamp. The complainant stated that this malfunction occurred 2-3 times during the silo loading activity but this was not verified during the inspection.

No notification of failure to comply to with limits of Air General Permit was reported to the Department. No documentation describing this incident was observed on the Operation and Maintenance Logs provided.

Operation and maintenance logs were retrieved and reviewed. Only "Daily, Weekly" logs were provided. There were no logs that document any "Quarterly, Annually" maintenance that should be performed per the Operation and Maintenance Plan submitted by the previous owner (4/3/2002). I was informed by Mr. Stiffler that the "Daily, Weekly" form is normally filled out during each silo loading. He was not aware of any routine inspections were performed on the control device bags. Mr. Stiffler did state that he was aware that the Mr. Kinsler had a mechanic go over the unit when he first purchased the unit (~12/2012). I advised Mr. Stiffler to better document the date of the checks performed. It does not appear that the original O&M Plan and associated forms were formally reviewed for adequacy by PCAQD.

The VE performed on 4/10/13 during the facility inspection was an observation of the truck load-out operation. This operation appeared to be in compliance.

Even though the unit is re-locatable, the unit has not relocated from its current location since the initial after-the-fact general permit was issued in 2002. No other permitted units are on site at this location.

There was some aggregate on the paved ground near the stockpiles. Mr. Stiffler stated that the facility well pump was broken and should be repaired so that watering of the yard could occur to prevent fugitive dust from being emitted. No track out or obvious issues were observed from fugitive dust during the inspection. The stockpiles were kept at a reduced level below the wind break height.

Exit Interview: I informed Mr. Stiffler that there may be some non-compliance issues regarding the emissions that occurred during the silo loading on 4/9/13. I also expressed that further review of the O& M Plan and associated documents may need to be addressed. Mr. Stiffler indicated that he had already been in contact with the control device manufacturer during the inspection and is having device parameters and check frequencies sent to him.

I also informed Mr. Stiffler that this unit will be required to perform another VE test within this calendar year because the test performed on 2/26/13 will be considered a compliance test for the 2012 calendar year.

Brennan Farrington

Inspector's Name

4/10/13

Date of Inspection

Inspector's Signature

~ 4/2014

Approximate Date of Next Inspection

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