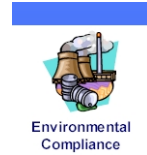




CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST



ARMS UPDATED

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

AIRS ID#: 1010490 **DATE:** 06/19/2012 **ARRIVE:** 7:15am **DEPART:** 9:15am
FACILITY NAME: B. E. T. ER MIX, INC.
FACILITY LOCATION: 3901 COPELAND DR
 ZEPHYRHILLS 33542-8403
OWNER/AUTHORIZED REPRESENTATIVE: JOHN WHITE* **PHONE:** (727)862-2239
Email: none **Mobile:**
CONTACT NAME: CHUCK JACKSON* **PHONE:** (727)862-2239
Email: none **Mobile:** (727)243-0774
ENTITLEMENT PERIOD: 5/31/2012 / 5/31/2017
(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): Leroy Ludeker

Brief Notes: lludeker@betermix.com

2. Is the Authorized Representative still JOHN WHITE*? ----- 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 CHUCK JACKSON*? ----- 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

2 –CCB Plant-split silo(cement)compartment#1 w/silotop baghouse subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

(check only one box for each question)

- 1. Date of last inspection: 12/03/2009
- 2. Did the emissions unit use reasonable precautions during the last inspection? ----- Yes No
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? ----- 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
- 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)? _____

Emissions Unit Section

3 –CCB Plant-split silo(flyash)compartment#2w/silotop baghouse subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

(check only one box for each question)

- 1. Date of last inspection: 12/03/2009
- 2. Did the emissions unit use reasonable precautions during the last inspection? ----- Yes No
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? ----- 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
- 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)? _____

Emissions Unit Section

4 –CCB Plant-truck loadout/batcher/weighhopperw/centr. baghouse subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

(check only one box for each question)

- 1. Date of last inspection: 12/03/2009
- 2. Did the emissions unit use reasonable precautions during the last inspection? ----- Yes No
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? ----- 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
- 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

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

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

Wendy D. Akins

06/19/2012

Inspector's Name (Please Print)

Date of Inspection

06/10/2017

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Pre-inspection: On May 22, 2012, the SW District received notification of new equipment registration for this facility. On May 24, 2012, I contacted Mr. Leroy Ludeker to introduce myself as the facility's new compliance contact at the Department and provide compliance assistance for requirements in the facility's permit. Mr. Ludeker stated he was not aware that new equipment must be tested within 30 days of initial operation and supplied additional information which indicated that another B. E. T. ER Mix facility (1010038) also had new equipment recently installed. I advised Mr. Ludeker to schedule Initial testing on all of B. E. T. ER Mix, Inc's. new equipment as soon as possible. The last inspection at this facility was in 12/2009. The purpose of

this inspection is to audit initial testing for 2 new silotop baghouse dust collectors recently installed at this facility. This testing will resolve failure to timely conduct initial testing on new equipment. Inspection Findings: This facility has 3 Emission Units. 2 silotop dust collectors and one Central Dust Collector which controls the truck load out and the weigh hopper. B. E. T. ER Mix, Inc., has only one water truck which is always located at the Hudson site. It is primarily used for the crusher facility. Mr. Ludeker answered checklist questions and escorted me around the facility. Mr. Ludeker was not aware of checklists and asked me to send him a copy of Blank Inspection checklists so he could share them with his staff. I committed to sending copies of the blank checklist for Concrete Batch Plants and Crusher facilities. During my inspection, I requested that Mr. Ludeker provide the Department with information about the start-up dates for the new silotop dust collectors at 2 of B. E. T. ER Mix facilities (Hudson and Zephyrhills). I gave Mr. Ludeker a week to send the information to me and requested that he copy the SW District Compliance Manager, Mrs. Danielle Henry. Mr. Ludeker sent the delivery tickets for the initial loading event for the two new dust collectors at this location and the new dust collector at the Hudson Plant (1010038) on August 6, 2012. According to loading records, the facility should have tested the new dust collectors at this location by June 9, 2012 per Rule 62-296.414(4)(a), of the Florida Administrative Code. Initial VE Testing at for the new dust collectors on Emission Unit Nos. 002 and 003 was conducted 10 days late. On 08/15/2012, I provided the checklist information and supporting websites to Mr. Ludeker by email. Photos were taken during this inspection and are attached to this inspection report.

DIGITAL PHOTOGRAPHIC LOG

1. Facility Name: B. E. T. ER Mix, Inc. -- Zephyrhills
2. County / AIRS ID No: 1010490--Pasco
3. Inspection Type: INS 2
4. Inspection Date: 06/19/2012
5. Date Photographic Log was completed: 08/20/2012
6. Type of Camera Used: Canon Power Shot SD400 Digital ELPH
7. Digital Recording Media: ScanDisk 256 MB SD Card
8. All Digital Photos Were Copied To: Hard Disk of Computer 143986 and to Digital Photographic Log
9. Original Copy Is Stored In/On: Hard disk of computer 143986
10. Were the photos altered?: NO ___ YES XXX explain yes: photo sizes were reduced to fit in this log.
11. Photographer: Wendy D. Akins
12. Signature of Photographer: _____



Photo ID No: IMG_482 – B. E. T. ER Mix, Inc. Zephyrhills
Plant truck loading activity



Photo ID No: IMG_488 – 2 silo top dust collector exhaust points are visible from this location (Emission Unit Nos. 002 and 003).



Photo ID No: IMG_483 - B. E. T. ER Mix, Inc. Zephyrhills
Plant truck loading activity



Photo ID No: IMG_486 – This photo shows a closer view of facility.



Photo ID No: IMG_487 – Close-up view of 2 new silo top dust collectors. Emission Unit No. 002 (Cement side) on left and Emission Unit No. 003 (Flyash side) on the right.



Photo ID No: IMG_489 – Close-up view of CDC (Emission Unit No. 004) which controls the truck load out and the weigh hopper.

All photos taken on this day were not necessary for inclusion in this photo log.