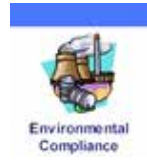




CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST



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

AIRS ID#: 7775231 **DATE:** 5/23/12 **ARRIVE:** 0900 **DEPART:** 0945

FACILITY NAME: WOODRUFF YARD

FACILITY LOCATION: 6450 31st Street E
BRADENTON

OWNER/AUTHORIZED REPRESENTATIVE: BRUCE WOODRUFF **PHONE:** (941)756-1871
Email: **Mobile:**

CONTACT NAME: BRUCE WOODRUFF **PHONE:** (941)756-1871
Email: **Mobile:**

ENTITLEMENT PERIOD: 10/26/2007 / 10/26/2012
(effective date) (end date)

Facility Section

PART I: INSPECTION COMPLIANCE STATUS (check **R** only one box)

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: ONSITE INTRODUCTORY MEETING (check **R** only one box for each question)

1. Name(s) of facility representative(s): Marvin Scott

Brief Notes: consultant

2. Is the Authorized Representative still BRUCE WOODRUFF? ----- 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 BRUCE WOODRUFF? ----- 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? ----- see comments

Emissions Unit Section
1-CEMENT STORAGE SILO subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION

(check **R** only one box for each question)

1. Date of last inspection: 10/5/09
2. Past Visible Emissions (VE) tests:
 - a. Was a VE test performed within each of the past 4 calendar years? ----- see comments
 - 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: 10/5/09
 - 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? 30.8 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 **R** 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 0 % 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? 24.4 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 **R** 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? crushing operation (see below)

 - 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? 7775052-Woodruff Crusher #2 (operates on site)

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 **R** 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 **R** 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 **R** 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

Max Grondahl

5-23-12

Inspector's Name (Please Print)

Date of Inspection

5-23-17

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: EU 001 Part I: the plant was not tested in 2010 or 2011 as it did not operate; batching rate not applicable for silo loading. Plant was tested today-first test since 2009. A short notice was approved for the test since the plant does not operate normally and would only run for a few days before shutting down again. Silo loading observed at normal rate-tank pressure on truck about 14 PSI. Truckload out also occurring but is not controlled by any means. Brief emissions observed during mixing but below 20% opacity. No emissions observed from the silo bag house during loading. After the inspection I emailed Bill Gleason for site-wide fuel use records. On 5/29/12 he emailed me records for crusher operation and said he would follow up with records for the soil cement plant. Records for the soil cement plant were provided on June 5, 2012. Site wide fuel use for both units is 784 gallons for 2012 and was 2,875 gallons in 2011. The soil cement plant did not operate in 2011, so all fuel usage was attributed to 7775052. See attachment for explanation of low reported loading rate.

From: [Marvin Scott, EEC](#)
To: [Grondahl, Max](#)
Cc: ["Bill Gleason"](#)
Subject: RE: VE Report for Woodruff and Sons 7775231-003-AG
Date: Monday, June 11, 2012 1:56:12 PM

Hello Max,

I reviewed the unloading rate circumstances with Mr. Bill Gleason and I believe that the following explains the difference in the rates.

"Woodruff and Sons, Inc. owns two different tanker trucks to unload Portland cement into the silo. Second, it has been almost 12 months since the tanker was used to unload cement and it may not have been operating as well as it could have. Third, the unloading time was estimated by Mr. Bill Gleason to be 60 minutes. However, if the actual unloading time was 58 minutes instead of 60, then the loading rate would be 25.3 ton/hour, when the 6 minutes of stoppage time is taken out. We believe that the difference in flow rate can be attributed to these 3 factors, first that the two trailers could potentially operate at different rates, second, it was almost a year ago that the cement plant was used to pump Portland cement and third the time estimate used to perform the calculation, makes a big difference in the value being higher or lower than 25 tons/hr with a chance as small as 2 minutes.

Thank you.

Marvin Scott

Senior Environmental Engineer
Environmental Engineering Consultants, Inc.
Phone 813-237-3781
Fax 813-238-0036

From: Grondahl, Max [mailto:Max.Grondahl@dep.state.fl.us]
Sent: Thursday, June 07, 2012 12:02 PM
To: 'mscott@eec-tampabay.com'
Cc: 'billg@woodruffandsons.com'
Subject: RE: VE Report for Woodruff and Sons 7775231-003-AG

Marvin,

Can you explain the lower loading rate? As you know, the general permit for this facility requires testing at a rate above 25 tons per hour unless there is some justification (mechanical or process limitations). 24.4 tons per hours is close, but the last test for this unit was performed at over 30 tons per hour. I'm just wondering what was limiting the rate during this most recent test. Perhaps an operator or Mr. Gleason could provide some insight?

Thanks,

Max Grondahl
FDEP Southwest District Air Program
Environmental Specialist III
13051 N Telecom Parkway
Temple Terrace, Florida 33637
(813)632-7600 Ext 116
(813)326-1761 (cell)

<http://www.dep.state.fl.us/air>

Please Note: Florida has a very broad public records law. Most written communications to or from officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

From: Marvin Scott, EEC [<mailto:msscott@eec-tampabay.com>]
Sent: Wednesday, May 30, 2012 3:07 PM
To: Grondahl, Max
Cc: 'Bill Gleason'
Subject: FW: VE Report for Woodruff and Sons 7775231-003-AG

Hello Max,
Please find attached the revised process rate statement for Woodruff and Sons, Inc.

Marvin Scott

Senior Environmental Engineer
Environmental Engineering Consultants, Inc.
Phone 813-237-3781
Fax 813-238-0036

From: Bill Gleason [<mailto:billg@woodruffandsons.com>]
Sent: Wednesday, May 30, 2012 2:52 PM
To: msscott@eec-tampabay.com
Subject: RE: VE Report for Woodruff and Sons 7775231-003-AG

Please see attached revision sheet.

From: Marvin Scott, EEC [<mailto:msscott@eec-tampabay.com>]
Sent: Wednesday, May 30, 2012 1:38 PM
To: 'Grondahl, Max'
Cc: 'Bill Gleason'
Subject: RE: VE Report for Woodruff and Sons 7775231-003-AG

Hello Mr. Grondahl,
I spoke with Bill Gleason and he confirmed that the information below is correct.

This is my understanding of the loading rate calculations.
Woodruff and Sons, Inc. loaded 21.94 tons, but they only used 18.25 tons. They started unloading before EEC arrived to perform the VE test. Mr. Bill Gleason estimated that this amount was approximately 10%, however, Mr. Gleason incorrectly used the amount of 18.25 and multiplied by 0.9, that value is 16.425, due to dyslexia, he wrote down 16.52 ton/hour.

However, the correct calculation is to use the 21.94 tons and to account for the 6 minutes the truck stopped unloading, therefore the correct calculation is $54/60 = 0.9$ hour, so you divide the 21.94 by 0.9 to arrive at a corrected loading rate of 24.38 tons/hour.

Mr. Gleason will provide a corrected process rate statement with his signature. Please excuse the mistake. Thank you.

Marvin Scott

Senior Environmental Engineer
Environmental Engineering Consultants, Inc.
Phone 813-237-3781
Fax 813-238-0036

From: Grondahl, Max [<mailto:Max.Grondahl@dep.state.fl.us>]
Sent: Wednesday, May 30, 2012 9:38 AM
To: mscott@eec-tampabay.com
Subject: FW: VE Report for Woodruff and Sons 7775231-003-AG

Hi Marvin,

The attached report indicates a silo loading rate of 16.52 tons per hour. Do you have the total tons unloaded and time to unload? I observed tank pressure at 14 psi during the test which would seem to indicate a higher loading rate.

Thanks,

Max Grondahl
FDEP Southwest District Air Program
Environmental Specialist III
13051 N Telecom Parkway
Temple Terrace, Florida 33637
(813)632-7600 Ext 116
(813)326-1761 (cell)
<http://www.dep.state.fl.us/air>

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Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).

From: Henry, Danielle D.
Sent: Tuesday, May 29, 2012 12:25 PM
To: Grondahl, Max
Cc: Hughes, Rhonda
Subject: FW: VE Report for Woodruff and Sons 7775231-003-AG

This report has been added to e-tracking.

Due date: 6.13.12

From: Marvin Scott, EEC [<mailto:msscott@eec-tampabay.com>]
Sent: Tuesday, May 29, 2012 12:17 PM
To: Henry, Danielle D.
Cc: 'Bill Gleason'
Subject: VE Report for Woodruff and Sons 7775231-003-AG

Hello Ms. Henry,
Please find attached a scanned copy of the visible emission report for the soil cement plant for Woodruff and Sons, Inc. for the VE performed on May 23, 2012, 7775231-003-AG. I will mail the hard copy today. Thank you.

Marvin Scott
Senior Environmental Engineer
Environmental Engineering Consultants, Inc.
Phone 813-237-3781
Fax 813-238-0036