



CONCRETE BATCHING PLANT



Environmental Compliance

COMPLIANCE INSPECTION CHECKLIST

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

Facility: Niagara Readi-Mix, Inc. DBA/Site Name: Pinellas Park Facility
ADDRESS: 10776 66th Street North, Pinellas Park, FL
ARMS NO: 7775242 001 PERMIT NO: 7775242-002-AG
DISTRICT: Southwest CONTACT PHONE: 727-544-1127
Expiration Date: 11/30/2013 Renewal Date: 10/31/2013 Test Date: 3/29/2000

EMISSION UNIT DESCRIPTION: Concrete batch plant consisting of a Belgrade Model 270BB Portable cement silo controlled by a Belgrade Model BST 150 baghouse with 150 square feet of collection surface.

INSPECTION DATE: 8-22-12 INSPECTION COMPLIANCE STATUS (check [] only one box)
[] In Compliance; [] Minor Non-Compliance; [X] Significant Non-Compliance

PART I: General Review:

1. Permit File Review [X] Yes [] No
2. Introduction and Entry [X] Yes [] No
Comments: This inspection was performed in order to determine if this facility has been operating within applicable regulations. The facility emission unit has been sold to Mr. Richard Miller (New Owner). He stated Mrs. Patricia Orcutt stills owned the land. Mr. Miller stated Niagara Readi-Mix Incorporated was sold to him since 12-22-10. He stated his business name is Niagara Concrete Incorporated. He stated they pneumatic loaded silo eighty six times since 12-22-10. I asked Mr. Miller if they have air permit to operate the emission unit. Mr. Miller, President and owner of Niagara Concrete Incorporated. Stated he did not have air permit. I informed Mr. Miller he needs to submit a new re-registration form to the Department of Environmental Protection. He stated he would have his emission unit register immediately.
3. Is the Authorized Representative still: Patricia A. Orcutt? [] Yes [X] No
Comments: Mr. Richard Miller is the new Authorized Representative. The e-mail address is:
4. Is the facility contact still: Patricia A. Orcutt? [] Yes [X] No
Comments: Mr. Richard Miller is the new facility contact. The e-mail address is:
5. If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [] Yes [X] 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? ----- [X] Yes [] No
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 7/6/11, 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.] ----- [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? [62-297.310(8)(b) ----- [X] Yes [] No

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)

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
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 n/a % 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 _____ 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

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

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

- 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]

Comments: Reviewed records for the months of 7/15/10 through 8/12/12, records were in compliance. See attached O&M log sheets. The operation and maintenance log were been kept under previous facility name (Niagara Read-Mix Incorporated).

<i>The annual Visible Emission test were also been performed under the previous facility name (Niagara Read-Mix Incorporated).</i>
<i>The new facility Niagara Concrete Incorporated has been operating since 12/11/10 without operation and maintenance (O&M) plan. Mr. Miller the new owner stated he was not aware his company is requires to have O&M plan. He also stated is not aware his require to submit a new re-registration form to the Department of Environmental Protection office.</i>
<i>Niagara Concrete Incorporated is considered to be in non-compliance with subsection Rule 62-210.310(2)(b) Florida Administrative Code.</i>
<i>Exit Interview: I informed Mr. Miller that they are operating without a permit. I told him this a violation and there was a possibility of penalties.</i>

Mike Ojo Thomas

8/22/12

Inspector's Name

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

H:\users\wpdocs\airqual\Air_Compliance\AQI\7775242 001 80828.doc