



# Florida Department of Environmental Protection

Northwest District  
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Pensacola, Florida 32502-5740

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

July 11, 2012

*By Electronic Mail, Received Receipt Requested*  
csgjc@panhandle.rr.com

Mr. James E. Campbell, President  
Fort Walton Concrete, Inc.  
930 Campbell Road  
Century, Florida 32535

Dear Mr. Campbell:

The purpose of this letter is to advise you of concerns noted during a May 30, 2012, Department compliance assistance visit at Fort Walton Concrete Freeport, Facility ID 7775257, and review of our files for the following three other Fort Walton Concrete facilities: Valparaiso ID 7774803; Fort Walton Beach ID 7770032; and Crestview Ready Mix ID 0910016. Department personnel noted the following concerns:

The October 21, 2010 visible emissions test report for Freeport ID 7775257 was obtained by the Department during the May 30, 2012 compliance assistance visit, or 588 days after the test was completed. The October 26, 2010 visible emissions test report for Valparaiso ID 7774803 was received by the Department on September 30, 2011 along with the re-registration for the facility's air general permit. The test report was submitted 339 days after the test was completed.

Rule 62-297.310(8)(b), Florida Administrative Code (F.A.C.), provides that the required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

On January 20, 2012 the Department received an e-mail from Fort Walton Concrete providing notification of their plans to conduct visible emissions tests at Fort Walton Beach ID 7770032 on February 14, 2012. On March 16, 2012 the Department received test reports indicating that the cement baghouse at the facility was tested on the noticed date of February 14. However, the report also included a visible emissions test conducted on the flyash silo baghouse on February 16, 2012. The 15-day advanced notification given indicated both silo baghouses would be conducted on February 14.

On November 21, 2011 the Department received test reports for visible emissions tests conducted at Valparaiso ID 7774803 on November 9, 2011 and for visible emissions tests conducted at Freeport ID 7775257 on October 27 and 28, 2011. The test reports were reviewed and entered into our database. During the current review of files for these facilities, it was discovered that 15-day advanced notices of plans to conduct the October 2011 tests were not found.

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On January 31, 2011 the Department received an e-mail from Fort Walton Concrete providing notification of their plans to conduct visible emissions tests at Crestview ID 0910016 on February 17, 2011. On March 24, 2011 the Department received visible emissions test reports indicating the cement silo baghouse was tested on the date noticed, but the flyash silo baghouse was tested two days prior to the noticed test date.

On October 8, 2010 the Department received a letter from Fort Walton Concrete providing notification of their plans to conduct visible emissions tests at Valparaiso 7774803 on October 21, 2010 and at Freeport 7775257 on October 26, 2010. Since the notification letter was dated October 5, or 16 days prior to conducting the test on October 21, it is within reason that the 15-day prior notification was met. However, the noticed test dates for the two facilities noticed appear to have been inadvertently switched.

On February 9, 2009 the Department received an e-mail from Fort Walton Concrete providing notification of their plans to conduct visible emissions tests at Crestview 0910016 on February 24, 2009. On March 11, 2009 the Department received reports indicating the cement silo baghouse at the facility was tested on the date noticed, February 24, but the flyash silo baghouse was tested two days after the noticed date. The facility was inspected on July 20, 2009 and was found to be in compliance with the air general permit.

Rule 62-297.310(7)(a)9, F.A.C., requires that the owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

Please contact Jennifer Waltrip at 850/595-0662 or [jennifer.waltrip@dep.state.fl.us](mailto:jennifer.waltrip@dep.state.fl.us) within 15 days of receipt of this letter to arrange a meeting to discuss these matters and ways to improve efforts for maintaining compliance with the facility's air operation permit.

We look forward to working with you to resolve these matters.

Sincerely,



Rick Bradburn  
Air Program Administrator

RB/jw/c

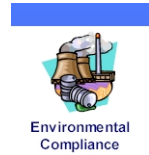
Enclosure

c: Zac Sims, Fort Walton Concrete: [ftwal26@yahoo.com](mailto:ftwal26@yahoo.com)  
Matthew R. Parker, P.E., JP Engineering: [parker matt@cox.net](mailto:parker matt@cox.net)  
John Thompson, Fort Walton Concrete: [ftwal26@yahoo.com](mailto:ftwal26@yahoo.com)



# CONCRETE BATCHING PLANT

## COMPLIANCE INSPECTION CHECKLIST



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

<b>AIRS ID#:</b> 7775257	<b>DATE:</b> <u>5/30/12</u>	<b>ARRIVE:</b> <u>11:23 am</u>	<b>DEPART:</b> <u>11:50 AM</u>
<b>FACILITY NAME:</b> FORT WALTON CONCRETE-FREEPORT			
<b>FACILITY LOCATION:</b> 465 BULLDOG RD FREEPORT 32439-3168			
<b>OWNER/AUTHORIZED REPRESENTATIVE:</b> JAMES CAMPBELL		<b>PHONE:</b> (850)243-8114	
<b>Email:</b> csgjc@panhandle.rr.com		<b>Mobile:</b>	
<b>CONTACT NAME:</b> ZACHARY SIMS		<b>PHONE:</b> (850)243-8114	
<b>Email:</b> ftwal26@yahoo.com		<b>Mobile:</b> (850)685-0744	
<b>ENTITLEMENT PERIOD:</b> 3/7/2010 / 3/7/2015 (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): Michael White, Plant Operator  
 Brief Notes: \_\_\_\_\_

2. Is the Authorized Representative still JAMES CAMPBELL? -----  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 ZACHARY SIMS? -----  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

1-CCB Plant-split silo,cement/flyash 800 Bblw/single baghouse subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION

(check [X] only one box for each question)

- 1. Date of last inspection: 4/14/10
2. Past Visible Emissions (VE) tests:
a. Was a VE test performed within each of the past 4 calendar years?
b. Has a VE test been performed yet within the current calendar year?
c. If first year of operation, was a VE test performed within 30 days of commencing operation?
d. Date of last VE test: 10/27/11
e. Was the VE test report filed with the compliance authority no later than 45 days after the test?
f. Did the report state the actual silo loading rate during emissions testing?
g. What was the actual silo loading rate? 25.9 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?
i. Did the test report state the actual batching rate during emissions testing?
j. What was the actual batching rate?
k. Did the emissions unit demonstrate compliance with the 5% opacity limit during the last VE test?-- 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 [X] only one box for each question)

- 1. Was a visible emissions test conducted by the facility for this unit during this site visit?
a. Was the visible emissions test conducted according to EPA Method 9?
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?
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?
e. If silo loaded, was the minimum loading rate of 25 tons/hour achievable in practice?
f. What was the silo loading rate?
g. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector?
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?
2) What was the batching rate? What was the batching duration?
3) What was the batching rate? What was the batching duration?
2. Was a visible emissions test conducted by the inspector for this unit during this site visit?
a. Was the visible emissions test conducted according to EPA Method 9?
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?
d. What was the process rate?

## Facility Section (continued)

### CONFIRMATION OF GENERAL PERMIT ELIGIBILITY

(check  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? \_\_\_\_\_
  
  - 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 (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

Not Applicable

### GENERAL CONDITIONS

(check  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  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

Jennifer Waltrip

May 30, 2012

Inspector's Name (Please Print)

Date of Inspection

May 2013

Approximate Date of Next Inspection

**COMMENTS:** On May 30, 2012, Department personnel conducted a compliance assistance visit at Fort Walton Concrete in Freeport. The Department would like to thank Mr. Michael White and Mr. John Thompson for their assistance during and after the compliance visit.

Records of routine maintenance and inspections were well maintained and available for review. Each operating shift facility personnel check the baghouses to ensure the baghouses are operating properly and there are no visible emissions. Weekly maintenance logs include watering the yard; cleaning the conveyor belts, cement silo and fly ash silo; and inspection and cleaning of spray bar.

No trucks were loaded during the inspection, but water was noted in the area around the silo, which would help prevent fugitive emissions. Mr. White indicated he regularly cleans the loading bay between loading trucks to further prevent unconfined fugitive emissions.

The Department was notified on October 8, 2010 of a test scheduled for October 26, 2010. However, a review of Department records indicates that no report was submitted for the calendar year 2010 Visible Emissions (VE) test. A copy of the 2010 VE test was requested during the inspection and available for review. The report indicated the test was conducted on October 21, 2010.

The Department notes the following concerns for the 2010 VE test:

The test report was not filed with the Department within 45 days after the test date as required by Rule 62-297.310(8)(b), Florida Administrative Code.

The Department was not properly notified 15 days prior to the test date. The test date occurred 13 days following the October 8, 2010 notification date.

Department personnel discussed strategies to maintain future compliance with Mr. John Thompson on June 1, 2012. Future plans include tracking submittal of test reports and working with the Department to develop a spreadsheet to track specific compliance deadlines for each Fort Walton Concrete facility.