



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1050378 **DATE:** 07/16/2009 **ARRIVE:** 7:09am **DEPART:** 10:30am

FACILITY NAME: DAVENPORT PLANT

FACILITY LOCATION: 4000 SAND MINE RD
 DAVENPORT 33897-3415

OWNER/AUTHORIZED REPRESENTATIVE: MICHAEL MAHONEY **PHONE:** (561)478-9980

CONTACT NAME: Dean Luzader **PHONE:** _____

ENTITLEMENT PERIOD: 1/17/2008 / 1/17/2013
 (effective date) (end date)

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

IN COMPLIANCE MINOR Non-COMPLIANCE SIGNIFICANT Non-COMPLIANCE

PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C.
 (check appropriate box(es))

Stack Emissions

- Were visible emissions tests conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?----- Yes No
- Are emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment controlled to the extent necessary to limit visible emissions to 5 percent opacity?----- Yes No
- 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?----- Yes No
- Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? (If answer to this question is “Yes”, then continue on to questions 4.a) and 4.b) below. If answer is “No” then skip 4.a) and 4.b) and continue on to question 5.)----- Yes No
 - Was the batching operation in operation during the visible emissions test?----- Yes No
 - During the visible emissions test, was the batching rate representative of the normal batching rate and duration?----- Yes No
- 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 conducted while batching at a rate that is representative of the normal batching rate and duration?----- Yes No

PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C. – (continued)

(check appropriate box(es))

Compliance Demonstration - (Rule 62-296.401(5)(i), F.A.C.)

1. Is each dust collector exhaust point tested according to the visible emissions limiting standard as part of the annual compliance demonstration? (Rule 62-297.310(7)(a), F.A.C.)----- Yes No

New Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)

2. Did this facility demonstrate:
- a) initial compliance no later than 30 days after beginning operation?----- Yes No
- b) annual compliance within 60 days prior to each anniversary of the air general permit notification form submittal date?----- Yes No

Existing Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)

3. In order to demonstrate annual compliance, was an annual visible emissions test conducted 60 days prior to the AGP Notification form submission, and within 60 days prior to each anniversary date?----- Yes No

Test Reports – (Rules 62-213.440, F.A.C. and 62-297.310(8)(b), F.A.C.)

4. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed?----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.300(4)(c)2., F.A.C.

(check appropriate box(es))

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. If this is a stationary concrete batching plant, is there one or more relocatable nonmetallic mineral processing plants using individual air general permits at the same location? (*If your answer to this question is YES, then proceed to questions 2.a), thru 2.d), below.*)----- Yes No
- a) Are there any additional nonexempt units located at this facility?----- Yes No
- b) Is the total combined annual facility-wide fuel oil usage of all plants less than 240,000 gallons per calendar year?----- Yes No
- c) Is the quantity of material processed less than ten million tons per calendar year?----- Yes No
- d) Is the fuel oil sulfur content 0.5% by weight or less?----- Yes No
3. Does the owner/operator of the concrete batching plant maintain a log book or books to account for:
- a) fuel consumption on a monthly basis?----- Yes No
- b) material processed on a monthly basis?----- Yes No
- c) the sulfur content of the fuel being burned (Fuel supplier certifications)?----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414(2)(a) and (b), F.A.C. (continued)

(check appropriate box(es))

Unconfined Emissions – (Rule 62-296.320(4)(c), F.A.C.)

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

PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300(4)(d)4., F.A.C.

A. New or Modified Process Equipment

1. Since the last inspection 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 substantially different than that noted on the most recent notification form?----- Yes No
 - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, FAC) to the appropriate DEP or local program office?----- Yes No

Wendy D. Simmons

7-17-09

Inspector's Name (Please Print)

Date of Inspection

09-04-2009

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Pre-inspection findings: See previous inspection report. Facility has a strict policy no trucks will pump above 8 psi to prevent blowing the baghouses at this facility. Inspection Results: The purpose of this inspection is to witness Visible Emissions (VE) testing that will serve as the retest for low rate VE testing conducted in November of 2008. According to Mr. Luzader, on July 13, 2009, the facility attempted to load the flyash silo at a higher loading rate unsuccessfully. Flyash silo bags blew and a material release occurred. Mr. Luzader stated that when the baghouse was checked after the incident, all 4 canisters were bad. For this reason, Mr. Luzader will strictly follow the "8 psi only" loading rate. Mr. Luzader stated that on the same day, the cement silos were filled at the 10 psi rate and no problems occurred, so he is not worried about reaching the 25tph rate on the cement silos. I asked Mr. Luzader if he reported the incident from July 13th to the Department and he stated he did not. I shared with Mr. Luzader the requirement to report such incidents in the General Permit Entitlement for the facility. I suggested that Mr. Luzader send a notice to the Department via email describing the incident in detail for documentation in the facility's file. I provided my email address and Mr. Luzader stated he would send me an email with the necessary information as soon as he gets a chance. I also requested that Mr. Luzader provide copies of the delivery tickets for the trucks supplying the flyash and cement for today's testing. Mr. Luzader stated he would provide that also via email. At approximately 9:10am the hose for cement silo had a problem. Dusting from truck back pressure occurred--truck was pumping at 8 psi. At 9:25 am the facility decided the truck should stop trying to load silo and move to the other cement silo. This first cement truck had a missing lock on its top load port which caused dusting from top of truck even after it moved to the other silo. Truck driver used a water hose to prevent/reduce particulate. Testing was not completed on the Cement silos because the tankers arrived late...at 9:00 am instead of 7:00am and consulting firm representative had another test planned and had to leave. According to the consulting firm representative, Mr. Ryan Peterson, the Flyash silo testing was again well below the 25 TPH requirement. Mr. Peterson stated his initial calculation puts the loading rate at about 14 TPH. Therefore, it was determined that the testing would need to be rescheduled for another date to give the facility an opportunity to investigate and correct any issues with the silo equipment. After some repairs to the connections both Cement tankers were able to successfully load product to the other cement silo. Testing for all three silos will need to be rescheduled once additional repairs have been made.

After this inspection in a series of phone calls with Mr. Mike Mahoney, the facility rescheduled the Visible Emissions testing for all three silos on September 4, 2009. Reports for testing conducted today were received by the Department on August 18, 2009. On 07/20/2009, Mr. Dean Luzader sent an email to the Department which stated that all correspondence for this facility will come from Mr. Mike Mahoney (see attached email). No written documentation was ever sent to the Department in reference to the, July 13, 2009, flyash incident. The Department will use enforcement discretion and accept the information provided during this inspection as report for flyash release.