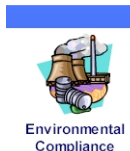




CONCRETE BATCHING PLANT
COMPLIANCE INSPECTION CHECKLIST



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

AIRS ID#: 7775310 001 **DATE:** 9/4/08 **ARRIVE:** 1:30 PM **DEPART:** 2:30 PM

FACILITY NAME: Action Concrete LLC

FACILITY LOCATION: 6201 Seminole Boulevard

Seminole, FL

RESPONSIBLE OFFICIAL: Richard K. Bailey?

PHONE: 727-391-6442

CONTACT NAME: Richard K. Bailey?

PHONE: 727-391-6442

REMITTANCE YEAR: N/A _____ **ENTITLEMENT PERIOD:** 1/8/2006 / 1/8/11
(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

1. Were visible emissions tests conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?----- ☐ Yes ☒ No
2. 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
3. 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
4. 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
 - a) Was the batching operation in operation during the visible emissions test?----- ☐ Yes ☐ No
 - b) During the visible emissions test, was the batching rate representative of the normal batching rate and duration?----- ☐ Yes ☐ No
5. 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

Mike Ojo Thomas

Inspector's Name (Please Print)

9/10/08

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: See the attached Pinellas County inspection report form for additional information

CONCRETE BATCHING PLANT

FACILITY: Action Concrete LLC		PERMIT ID: 2758
Seminole Yard		DISTRICT: Southwest
ADDRESS: 6201 Seminole Boulevard Seminole, FL		CONTACT PHONE: 727-391-6442
ARMS NO: 7775310 001	PERMIT NO: 7775310-001-AG	Expiration Date: 1/8/11 Renewal Date: 12/9/10 Test Date: 11/15/00

EMISSION UNIT DESCRIPTION: Concrete Batch with 350 barrel Belgrade cement silo, emissions controlled by a 225 Baghouse

INSPECTION DATE: 9/4/08	ARMS INSPECTION TYPE: ☒ INS2 or ☐ INS_____	COMPLIANCE STATUS: ☒ IN ☐ MNC ☐ SNC
Type of Inspection: ☒ Initial ☐ Re-inspection ☐ Complaint ☐ Drive-by ☐ Quarterly		
A. General Review:		

1.	Permit File Review	☒ Yes ☐ No
2.	Introduction and Entry	☒ Yes ☐ No
<i>Comments: This inspection was performed in order to determine if facility has been operating within applicable regulations. Mr. Bailey (owner) was present during the facility inspection of the emission unit.</i>		
3.	Is the Authorized Representative still: <u>Richard K. Bailey?</u>	☒ Yes ☐ No
<i>Comments:</i>		
4.	Is the facility contact still: Richard K. Bailey?	☒ Yes ☐ No
<i>Comments:</i>		

I N	M N C	S N C	B. Specific Conditions
☒	☐	☐	The owner or operator of any equipment used to mix cement and soil for onsite soil augmentation or stabilization shall notify the Department by telephone, e-mail, fax, or written communication at least one (1) business day prior to changing location and transmit (by e-mail, fax, post, or courier) a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department no later than five (5) business days following relocation. The owner or operator of any other relocatable concrete batching plant proposing to change location shall transmit a Facility Relocation Notification Form to the Department at least five (5) business days prior to relocation. [62-210.310(5)(b)3.b., F.A.C.] Comments: This facility is not a relocatable concrete batch plant.

I N C	M N C	S N C	
			B. Specific Conditions
☒	☐	☐	A facility using this air general permit may collocate with other facilities that separately registered for, and are also using, the concrete batching plant air general permit, and with facilities using the nonmetallic mineral processing plant air general permit at paragraph 62-210.310(5)(e), F.A.C., even if under the control of different persons, provided the following conditions are met. a. The collocation site does not contain any emissions units and pollutant-emitting activities other than concrete batching plants using air general permits, nonmetallic mineral processing plants using air general permits, and nonmetallic mineral processing plants or other emissions units and pollutant-emitting activities exempted from permitting pursuant to subsection 62- 210.300(3), F.A.C., or Rule 62-4.040, F.A.C. b. The total fuel consumption by all emissions units at the collocation site shall not exceed 275,000 gallons of diesel fuel, 23,000 gallons per year of gasoline, 44 million standard cubic feet per year of natural gas, or 1.3 million gallons per year of propane, or an equivalent prorated amount if multiple fuels are used. c. If multiple fuels are used, the equivalent prorated amount of each fuel burned shall not exceed the total amount of such fuel allowed to be burned, as given in sub-subparagraph b., multiplied by a fuel percentage. The fuel percentage is the percentage ratio of the amount of the fuel burned at the facility to the total amount of such fuel allowed to be burned at the facility pursuant to subparagraph b. The sum of the fuel percentages for all fuels burned by the facility shall not exceed one hundred percent (100%). d. The owners or operators of all collocated concrete batching plants and nonmetallic mineral processing plants shall maintain records to account for site-wide fuel consumption for each calendar month and each consecutive twelve (12) months. The owners or operators shall retain these records, available for Department inspection, for a period of at least five (5) years. [62-210.310(5)(b)4., F.A.C.] Comments: The facility ☐ does ☐ does not operate operated a nonmetallic mineral processing plant on-site under general permit No. 7775310-001-AG. Reviewed the records for the months of ___n/a___, ___n/a___, and ___n/a___. The maximum 12 month totals of ___n/a___gallons/year of fuel and ___n/a___ tons/year of material processed. Pressure relief pop-up valve(s) – is there a accumulation of cement around the pop-off valves? ☐ Yes ☒ No Silo housings & duct work – are there any apparent leaks? ☐ Yes ☒ No
☒	☐	☐	Unconfined Emissions. The owner or operator shall take reasonable precautions to control unconfined emissions from hoppers, storage and conveying equipment, conveyor drop points, truck loading and unloading, roads, parking areas, stock piles, and yards as required by Rule 62-296.320(4)(c), F.A.C. For concrete batching plants the following shall constitute reasonable precautions: (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, and yards. 2. Application of water or environmentally safe dust- suppressant chemicals when necessary to control emissions. 3. Removal of particulate matter from roads and other paved areas under control of the owner or operator to mitigate re-entrainment, and from building or work areas to reduce airborne particulate matter. 4. Reduction of stock pile height or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles. (b) Use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck. [62-296.414(2)] Comments: The yard was wet; there were no unconfined emissions, from site activity at the time of the inspection.
☒	☐	☐	Visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. If emissions from the weigh hopper (batcher) operation are also controlled by the silo dust collector, the batching operation shall be in operation during the visible emissions test. The batching rate during the emissions test shall be representative of the normal batching rate and duration. Each test report shall state the actual silo loading rate during emissions testing and, if applicable, whether or not batching occurred during emissions testing. [62-296.414(3)(c), F.A.C.] Comments: The last test, on 11/15/07, was conducted at a process rate of 25 tph. Based on that test, the facility process rate was limited to 25 tph.

I N C	M N C	S N C	
B. Specific Conditions			
☒	☐	☐	If emissions from the weigh hopper (batcher) operation are controlled by a dust collector which is separate from the silo dust collector, visible emissions tests of the weigh hopper (batcher) dust collector exhaust point shall be conducted while batching at a rate that is representative of the normal batching rate and duration. Each test report shall state the actual batching rate during emissions testing. [62-296.414(3)(d), F.A.C.] Comments: Emission from the weigh hopper are not controlled by a separate dust collector.
☒	☐	☐	<u>Frequency of Testing.</u> 1. The owner or operator of any concrete batching plant using an air general permit shall have a performance test conducted for visible emissions no later than thirty (30) days after the unit commences operation, and annually thereafter. 2. The owner or operator of any concrete batching plant operating under the authority of an air construction permit or air operation permit shall have a performance test conducted for visible emissions for each dust collector exhaust point prior to submitting the application for an initial air operation permit, and annually thereafter. [62-296.414(4), F.A.C.] Comments: The test is required to be completed annually. The last test was conducted on 11/15/07, and the test results were submitted on 11/27/08.
☒	☐	☐	Test Reports. - The required test report shall be filed with the PCDEM as soon as practical but no later than 45 days after the test is completed. [Rules 62-213.440 and 62-297.310(8)(b), F.A.C.] Comments: The last test was conducted on 11/15/07, and the test results were submitted on 11/27/08.
☒	☐	☐	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 7/30/07 through 9/4/08 indicated emission unit in compliance.
C. General Procedure Requirements and Conditions			
☒	☐	☐	Administrative Corrections. Within thirty (30) days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include: 1. Any change 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 2. Any other similar minor administrative change at the facility. 62-210.310(2)(d), F.A.C.] Comments: Not applicable at this time.

☒	☐	☐	Equipment Changes. The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit. 62-210.310(2)(e), F.A.C.] Comments: Not applicable at this time.
☒	☐	☐	The owner or operator's use of an air general permit is limited to five (5) years. Prior to the end of the five (5) year term, the owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. To avoid lapse of authority to operate, the owner or operator must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility's existing air general permit. The air general permit re-registration form shall contain all current information regarding the facility. [General Conditions - 62-210.310(3)(a), F.A.C.] Comments: The permit expires on 1/8/11. A new notification form is required to be submitted no later than 12/9/10.

D. Other:

Pollution Prevention Activities Pollution Prevention Activities

- P2 Handouts Provided: ☒ P2 Brochure; ☐ P2 Manual; ☐ P2 Checklist
- Have any emissions reductions occurred ☐ Yes / ☐ No _____
- ☐ Chemical Substitution; ☐ Equipment Changes; ☐ Process Changes
- ☐ Chemical/Material Reuse; ☐ On-site Recycling; ☐ Other: _____

Comments: I gave Mr. Bailey a copy of the reasonable precaution handout.

Closing Conference ☒ Yes ☐ No

Comments: I informed Mr. Bailey, that it appears the facility is in compliance.

Other Comments: Mr. Bailey stated that his concrete business has gone from bad to worst. He stated he had put his concrete business for sale and waiting for a buyer. I was not able to perform visible emissions test, because no pneumatic loading of the silo at the time. Mr. Bailey stated he had no idea to when he would pneumatic loading the silo.

Inspector(s): Mike Ojo Thomas, Pinellas County, Air Quality Division

Signature(s)

Date: 9/10/08

CONTACT LOG? __yes__, ACCESS? __yes__, ARMs? __yes__

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