CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST

Environmental Compliance

ARMS UPDATED 06/22/2012 AB

INSPECTION TYPE: ANNUAL (INS1, INS2) ☒ COMPLAINT/DISCOVERY (CI) ☐

RE-INSPECTION (FUI) ☐ ARMS COMPLAINT NO:

AIRS ID#: 1190047 **DATE:** **04/24/2012** **ARRIVE:** **~15:20** **DEPART:** **~16:30**

FACILITY NAME: PRO-CRETE MATERIALS

FACILITY LOCATION: 1320 INDUSTRIAL DR

WILDWOOD 34785-5200

OWNER/AUTHORIZED REPRESENTATIVE: ADAM FREEMAN **PHONE:** (407)422-3768
Email: adam@a1block.com **Mobile:**
CONTACT NAME: ADAM FREEMAN **PHONE:** (407)422-3768
Email: adam@a1block.com **Mobile:**
ENTITLEMENT PERIOD: 2/18/2012 (effective date) / 2/18/2017 (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): Paul Gordon

Brief Notes: Plant personnel present during inspection and visible emissions (VE) test audit: Paul Gordon (Operator), Kevett T. Mickle (Grove Scientific & Engineering), and a truck operator.

2. Is the Authorized Representative still ADAM FREEMAN? ---------- ☒ Yes ☐ No
If no, who is?: N/A

If different, did the facility provide an administrative update within 30 days? ---------- ☐ Yes ☐ No

3. Is the facility contact still ADAM FREEMAN? ---------- ☒ Yes ☐ No
If no, who is?: N/A

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*

*On 04/18/2012, Facility requested short-notice VE testing, which was approved on 04/18/2012 by the Department.

Emissions Unit Section

EU002 –CCB Plant-West (cement) silo w/silotop dust collector subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION

1. Date of last inspection: 05/18/2009
2. Past Visible Emissions (VE) tests:
   a. Was a VE test performed within each of the past 4 calendar years? ---------- ☐ Yes ☒ No*

Facility shut down in August 2010, then was purchased by a different company, A-1 Block Corporation, and facility restarted operations in April 2012..

   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: 05/18/2009
   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? 24.8 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? N/A 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)? N/A

PART II: STACK EMISSIONS from a silo, weigh hopper(batcher) or other enclosed storage and conveying equipment

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 0.83% % 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)? N/A

   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
   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? 43.78 tons/hour
   g. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? ---☒ N/A ☐ 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 4.79 % 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? 44 tons/hour.

Emissions Unit Section

EU003 –CCB Plant-East(cement),350 barrel silo,silotop dust collect. subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION (check ☑ only one box for each question)

1. Date of last inspection: _____
2. Past Visible Emissions (VE) tests:
   a. Was a VE test performed within each of the past 4 calendar years? ---------- ☐ Yes ☒ No**

Silo is a new addition to this facility and has not yet been loaded and not yet tested for visible emissions (VE).

   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: N/A
   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? _____ 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 ☑ 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 _____ % 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
   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? _____ 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 ☑ 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? N/A

   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? N/A

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? ---------- ☐ N/A ☒ Yes*** ☐ No
   ******The only fuel used at this facility is off-road diesel for the front end loader onsite.***
   b. 23,000 gallons of gasoline? ---------- ☒ N/A ☐ Yes ☐ No
   c. 44 million standard cubic feet on natural gas? ---------- ☒ N/A ☐ Yes ☐ No
   d. 1.3 million gallons of propane? ---------- ☒ N/A ☐ Yes ☐ No
   e. Or an equivalent prorated amount if multiple fuels are used onsite (use equation below)? - ☒ N/A ☐ Yes ☐ No

   $$\frac{\text{N/A gal diesel/yr}}{\text{275,000 gal diesel/yr}} + \frac{\text{N/A gal gasoline/yr}}{\text{23,000 gal gasoline/yr}} + \frac{\text{N/A MM SCF nat. gas/yr}}{\text{44 MM SCF nat. gas/yr}} + \frac{\text{N/A MM gal propane/yr}}{\text{1.3 MM gal propane/yr}} \leq 1.00?$$

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 ☑ 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

Amaury Betancourt	04/24/2012
Inspector's Name (Please Print)	Date of Inspection
Amaury Betancourt Digitally signed by Amaury Betancourt DN: cn=Amaury Betancourt, o=Florida Department of Environmental Protection, ou=Air Resource Management, email=amaury.betancourt@dep.state.fl.us, c=US Date: 2012.06.22 08:28:06 -04'00'	09/30/2017
Inspector's Signature	Approximate Date of Next Inspection

COMMENTS: I, Amaury Betancourt, conducted a visible emissions (VE) test audit and facility air compliance inspection at the Pro-Crete Materials facility in Sumter County, FL. I arrived at the facility at approximately 15:20. This facility is a concrete batch plant and operates under an air general operating permit, permit number 1190047-002-AG, which is the only current applicable air permit for this facility. I met with Mr. Paul Gordon, Plant Operator, and Mr. Kevett T. Mickle, visible emissions (VE) test observer from Grove Scientific and Engineering, consultant for Pro-Crete Materials. A truck operator was present during the test to load cement from the truck into the West cement silo (EU002) at the facility.

The only current applicable air permit for this facility is air general operating permit 1190047-002-AG. The application for this permit was received by the Department on 01/19/2012 due to a change in ownership of the facility. On 5/30/2012, Ms. Sara Greivell of Grove Scientific and Engineering, the engineering consultant of Pro-Crete Materials, stated in an email that the facility was purchased in December 2011. The air general operating permit 1190047-002-AG became effective on 02/18/2012 and expires on 02/18/2017. This facility shut down in August 2010, the facility had a change in ownership and then began operations again on April 1, 2012.

Currently, there are two emission units (EUs) at this facility, EU002 and EU003, and are described as follows:

(1.) EU002 is the West silo. This silo is the existing silo, which existed at the facility prior to the facility being purchased in December 2011. This silo is used for cement and is operational.

(2.) EU003 is the East silo, which has not yet begun operations at this facility.

The facility did not have any records on site because the facility's new owners began operating on April 1, 2012. According to Ms. Greivell, only one of the two silos on site is currently in operation. This one silo (EU002) has been filled two times per month. The silo was loaded two times in April and two times in May. The operational silo on site (EU002) existed at the facility prior to purchase of the facility in December 2011 and specifications are unknown, and the currently non-operational silo on site (EU003) was moved from the Sanford facility. Each of these silos has its own baghouse. Specifications of the non-operational silo and of each baghouse on each silo will be confirmed with the facility and updated in the ARMS database upon receipt of information on these specifications.

According to my audit of the VE test on 04/24/2012, puffs of dust (between 5% and 20% opacity) were noted at three different time periods, approximately 11 minutes, 17 minutes, and 22 minutes after the loading of the silo began. According to my VE test audit, though emissions had reached up to 20% opacity for one reading, this facility passed its VE test requirements because the highest average 6-minute opacity was approximately 4.79% opacity. In a telephone conversation on 04/26/2012, I spoke with Mr. Adam Freeman, Owner/Authorized Representative of this facility and of A-1 Block Corporation and Pro-Crete Materials and asked several questions regarding the facility, including verification that the operational silo and baghouse at the facility were functioning correctly. I conducted a follow-up telephone call on 05/11/2012 and spoke with Mr. Ted Caviglia of A-1 Block Corporation. I asked him about the maintenance of the baghouse including some additional unanswered questions from my 04/26/2012 telephone call. Mr. Caviglia informed me that Grove Scientific and Engineering would contact me regarding answers to my questions about the facility.

On 05/30/2012, I received an e-mail from Ms. Sara Greivell of Grove Scientific and Engineering, answering my questions about the facility. According to Ms. Greivell, the baghouse was inspected to verify it was connected properly to the silo. The pop-off valves and other seals were checked for leaks. No leaks were found and Ms. Greivell stated that it is believed the issues during the test were related to the truck. In addition, there has not been any maintenance performed at this facility since operation began April 1, 2012. There have been no equipment changes since receipt of the air general operating permit application.

Based on this walkthrough inspection, VE test audit, and answers to questions regarding facility production and baghouse maintenance, this facility appears to be IN compliance with its air general operating permit conditions.####