



Florida Department of Environmental Protection

Northwest District Branch Office
630-3 Capital Circle NE
Tallahassee, Florida 32301

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

November 12, 2009

SENT VIA E-MAIL
CDSMFG@earthlink.net

Clayton Sembler, President
CDS Manufacturing Incorporated
106 Charles Hayes Sr. Drive
Gretna, Florida 32332

Dear Mr. Sembler:

A Department representative inspected your facility to determine compliance with the Air Quality Operating Permit. The Air Program identification number for this facility is **0390045**. Your facility permit **expires on March 2, 2013**. This letter applies only to activities covered by the Air Resource Management Program.

Based on the facility inspection results, the Tallahassee Branch Office reported a status of **In-Compliance** for your facility. However the following issue **requires your immediate attention**:

The facility should notify the Department of compliance testing. A compliance test report should be submitted within 30 days receipt of this inspection report. Failure to conduct testing within 30 days of start up may result in a non compliant facility status.

Note that your facility compliance status may be subject to further review by the District Program Office.

The assistance you provided is appreciated. The inspection checklist and its comments section are enclosed. If you have any questions, your local contact is Tracy White at 850/ 488-3704 or tracy.a.white@dep.state.fl.us.

Sincerely,

Marlane Castellanos

Marlane Castellanos
Branch Manager

MC/tw
Enclosures

cc: Rick Bradburn; Erica Mitchell; Mary Beth Curle. FDEP, Pensacola
Leanne Moorehead, CDSIm@earthlink.net



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0390045 **DATE:** 11/03/2009 **ARRIVE:** 10:30 **DEPART:** _____

FACILITY NAME: CDS-FDOT CASTING YARD

FACILITY LOCATION: 106 CHARLES HAYES SR DR
GRETNA 32332

OWNER/AUTHORIZED REPRESENTATIVE: CLAYTON SEMBLER **PHONE:** (850)875-4651

CONTACT NAME: Leanne Moorehead **PHONE:**

ENTITLEMENT PERIOD: 3/2/2008 / 3/2/2013
(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

Tracy White

11/03/2009

Inspector's Name (Please Print)

Date of Inspection

Tracy White

6-12 months

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS:

The facility appeared to be in operation. The facility had two storage silos with filter units and a central mixing batcher. No batch point baghouse appeared to be present. The facility appears to have pre-mixed (wet) concrete batch equipment, so the facility does not appear to need batch trucks.

After the inspection I reviewed compliance records. I did not locate a compliance test entry. I contacted Leanne Moorehead, QC manager. Ms. Moorhead explained that she had attempted to contract with a consultant to perform the testing, but was having difficulty. I recommended that she contact the District office, Erica Mitchell.

As requested, I sent her an email with the testing rule and another email of the 15 day notification requirement.

Note: Some items on the checklist could not be completed due to the following: Insufficient information; Testing not performed for a new facility.

Recommendations:

The facility should immediately notify the Department of compliance testing. A compliance test report should be submitted within 30 days receipt of this report. Failure to conduct testing within 30 days of start up may result in a non compliant facility status.