



# Florida Department of Environmental Protection

Northwest District Branch Office  
3900 Commonwealth Boulevard, MS 55  
Tallahassee, Florida 32399-3000

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard, Jr.  
Secretary

February 11, 2013

SENT VIA E-MAIL  
[CDSMFG@earthlink.net](mailto: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.

The Tallahassee Branch Office reported a status of In Compliance for your facility. 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) 245-2960 or [tracy.a.white@dep.state.fl.us](mailto:tracy.a.white@dep.state.fl.us).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cliff Wilson III'.

Clifford D. Wilson III, P.E.  
Assistant Director, Northwest District

CW/tw

Enclosures

cc: Mike Mall, CDS, Inc. ([MikeM@CDSmanufacturing.net](mailto:MikeM@CDSmanufacturing.net))  
Armando Sarasua; Carol Melton; Mary Beth Curle (FDEP, Pensacola)



# CONCRETE BATCHING PLANT



## COMPLIANCE INSPECTION CHECKLIST

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

<b>AIRS ID#:</b> 0390045	<b>DATE:</b> <u>1/24/2013</u>	<b>ARRIVE:</b> <u>10:00 A.M</u>	<b>DEPART:</b> <u>10:30 A.M.</u>
<b>FACILITY NAME:</b> CDS-FDOT CASTING YARD			
<b>FACILITY LOCATION:</b> 106 CHARLES HAYES SR DR GRETNA 32332			
<b>OWNER/AUTHORIZED REPRESENTATIVE:</b> CLAYTON SEMBLER		<b>PHONE:</b> (850)875-4651	
<b>Email:</b> claytons@cdsmanufacturing.net		<b>Mobile:</b>	
<b>CONTACT NAME:</b> CLAYTON SEMBLER		<b>PHONE:</b> (850)875-4651	
<b>Email:</b> claytons@cdsmanufacturing.net		<b>Mobile:</b>	
<b>ENTITLEMENT PERIOD:</b> 3/2/2008 / 3/2/2013 (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): Mike Mall  
 Brief Notes: \_\_\_\_\_

2. Is the Authorized Representative still CLAYTON SEMBLER? -----  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 CLAYTON SEMBLER? -----  Yes    ..No  
 If no, who is?: Mike Mall

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 –concrete batching plant subject to Reasonable Precautions**

**PART I: FILE REVIEW PRIOR TO INSPECTION**

(check  only one box for each question)

1. Date of last inspection: 1/13/2011
2. Did the emissions unit use reasonable precautions during the last inspection? -----  Yes  No  
 If not: a. Did the inspector perform a general VE test (20% opacity)? -----  Yes  No  
 b. If tested: (\_\_\_\_\_)% opacity. Were the visible emissions < 20% opacity? -----  N/A  Yes  No  
 c. What caused the problem(s) (if known)? \_\_\_\_\_

**PART II: FIELD OBSERVATIONS – Rule 62-296.414(2), F.A.C.**

(check  only one box for each question)

**Unconfined Emissions from Truck Loading and Unloading, Hoppers, Storage and Conveying Equipment, Conveyor Drop Points, Roads, Parking Areas, Stock Piles, and Yards**

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
2. If reasonable precautions not being taken:
  - a. Did the inspector perform a general VE test (20% opacity)? -----  Yes  No
  - b. If tested: (\_\_\_\_\_)% opacity. Were the visible emissions < 20% opacity? -----  Yes  No
  - c. What caused the problem(s) (if known)? \_\_\_\_\_

## 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 onsite (use 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

### 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

Tracy White

1/24/2013

Inspector's Name (Please Print)

Date of Inspection

*Tracy White*

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** I viewed the plant. The facility appeared to be in operation. However no trucks were being loaded during inspection. No changes to equipment were noted. I went to the main office and met with Mike Mall (850-251-0767). I notified Mr. Mall of his upcoming permit expiration. Mr. Mall indicated he had already received a notification from the Department, and he displayed the letter. He indicated he was working on submitting the permit renewal information. I spoke with him again on 2/08/2013, and directed him to Douglas Thornton (SBEAP) for permitting questions.