



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1270044	DATE: <u>02/21/2014</u>	ARRIVE: <u>9:30am</u>	DEPART: <u>10:41am</u>
FACILITY NAME: MASCHMEYER-DELTONA FACILITY			
FACILITY LOCATION: 3296 GRAVES AVE DELTONA 32725			
OWNER/AUTHORIZED REPRESENTATIVE: ROBERT (BOB) TUCKER		PHONE: (561)848-9112	
Email: tucker@maschmeyer.com		Mobile: (561)718-0551	
CONTACT NAME: David Boldt		PHONE: (407)339-5311	
Email: daveboldt@maschmeyer.com		Mobile:	
ENTITLEMENT PERIOD: 10/5/2009 / 10/5/2014 (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): David Boldt

Brief Notes: The inspection was conducted in conjunction with a Wastewater follow-up inspection. The facility tanks and hazardous waste areas were also evaluated during the inspection. (See comments at end of report.)

2. Is the Authorized Representative still ROBERT (BOB) TUCKER? ----- 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 DAX DAWSON? ----- Yes ..No
 If no, who is?: David Boldt

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 –CCB Plant-silo (cement) w/siloto baghouse subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

1. Date of last inspection: 7/12/11
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.

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)? _____

Emissions Unit Section

2 –CCB Plant-weigh hopper w/small baghouse subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

- 1. Date of last inspection: 7/12/11
- 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.

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)? _____

Emissions Unit Section

3 –CCB Plant-truck loadout w/rubber shroud into R-Mix hopper subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

- 1. Date of last inspection: 7/12/11
- 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.

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

Wanda Parker-Garvin

2/21/14

Inspector's Name (Please Print)

Date of Inspection

Wanda Parker Garvin

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: On 2/21/14 Wanda Parker-Garvin of FDEP conducted a compliance inspection along with Debra Knight of FDEP while who conducted an industrial wastewater (IW) follow-up inspection. Ms. Parker-Garvin made contact with Mr. David Boldt, Plant Manager with Maschmeyer Concrete. Ms. Parker-Garvin informed Mr. Boldt she and Ms. Knight were there to conduct Air and IW inspections. Mr. Boldt stated the facility had no modifications, no major maintenance and no emergency generators on site. Mr Boldt stated the facility was currently installing pitch valves on both silos in order to prevent the trucks from overfilling. The site was sufficiently wet with no unconfined emissions leaving the property and the sprinklers are used as needed or at least 2 to 3 times per week.

Mr. Boldt accompanied Ms. Parker-Garvin and Ms. Knight on a walkthrough of the facility. The facility had on-site diesel fuel for their highway loader. The fuel tank was double-walled which had some staining and spillage from the nozzle onto the concrete beneath the tank. (See attached photos.) Ms. Parker-Garvin asked Mr. Boldt to address the stained concrete with corrective actions.

The cement and the fly ash silos were observed. Mr. Boldt stated they had recently cleaned the outside of the fly ash silo while installing the pitch valve. The cement silo had some visual waste product on the outside. Mr. Boldt stated the silo was in the process of being cleaned on the outside.

The product and hazardous waste storage area was inspected. The storage area contained four (4) unlabeled 55-gallon drums, two (2) red unlabeled 55-gallon drums on a secondary pad, three (3) anti-freeze 55-gallon drums, one (1) 55-gallon used-oil drum, one (1) 55-gallon oil filter drum and six (6) 5-gallon motor oil containers. One of the anti-freeze drums was leaking onto the concrete inside the storage area. (See the attached photos.) Ms. Parker-Garvin asked Mr. Boldt to apply an absorbent to clean up the spill and address the leaking drum. Ms. Parker-Garvin asked Mr. Boldt what was inside the unlabeled drums and if he had waste manifests for disposal. He stated the drums most likely contained used oil and the manifest were kept at the home office. Ms. Parker-Garvin informed Mr. Boldt that the drums should be labeled and dated. An area outside of the storage area had visual staining and Mr. Boldt stated previously that area was used to store old parts/equipment.

At the conclusion of the inspection, Ms. Parker-Garvin requested documentation for the diesel fuel usage, facility throughput data and corrective actions to address the tank and product/waste storage area.

On March 18, 2014, a meeting was held at the District office to discuss the facility's existing Warning Letter with the Wastewater program and the findings of the 2/21/14 inspection. At the conclusion of meeting the facility agreed to provide additional information to address the inspection requests/findings.

On April 4, 2014, Mr. Bob Tucker, Safety, Health & Environmental Manager with Maschmeyer, sent an email with photo and supporting documents to address the requests and findings from the 2/21/14 inspection. The information included the following:

- *The cement quantities for a 12 month period from March 2013 to March 2014, were 8,646.15 tons, flyash quantities from March 2013 to March 2014 were 3,106.02 .*
- *An attached document for the Plant Manager to log all deliveries on a weekly basis to have this information readily available at the plant location.*
- *Fuel usage from January 1st 2013 to December 31st 2013 was 66,880.4 gallons.*
- *There is no gasoline, no natural gas and no propane usage at the facility.*
- *An attached BMP that is located in the FDEP binder at the plant office.*
- *Due to several changes to their management staff at the Deltona Plant, it's apparent more training and monitoring is going to be a required element for the new managers.*

The photos showed the before and after conditions from the inspection findings. The additional information and photos addressed all the corrective actions.