

CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

	OMPLAINT/DISCOVERY (CI)			
RE-INSPECTION (FUI)	RMS COMPLAINT NO:			
AIRS ID#: 7775716 DATE: <u>08/09/2012</u> ARI	RIVE: <u>10:02am</u> DEPART: <u>10:25am</u>			
FACILITY NAME: ENVIROTEK-PRESTO 17				
FACILITY LOCATION: 18660 CORTEZ BLVD				
BROOKSVILLE 34601-9013	3			
OWNER/AUTHORIZED REPRESENTATIVE: JOSH PRY Email: jpryor@envirotek.com CONTACT NAME: MELISSA COCKROFT Email: mcockroft@envirotek.com ENTITLEMENT PERIOD: 4/14/2012 / 4/14/2017 (effective date) (end date)	PHONE: (813)909-0040 Mobile: (813)545-5236 PHONE: (813)909-0040 Mobile:			
Facility Section				
PART I: <u>INSPECTION COMPLIANCE STATUS</u> (check ✓ IN COMPLIANCE ✓ MINOR Non-COMPLIANCE	<u> </u>			
PART II: ONSITE INTRODUCTORY MEETING	(check ☑ only one box for each question)			
1. Name(s) of facility representative(s):	box for each question)			
Brief Notes:				
2. Is the Authorized Representative still JOSH PRYOR?If no, who is?:				
If different, did the facility provide an administrative update v 3. Is the facility contact still MELISSA COCKROFT? If no, who is?:	within 30 days? ☐ Yes ☐No ☐ Yes ☐No			
4. Will facility be conducting VE test(s) during today's inspection of the second seco				

Emissions Unit Section 1 –CCB Plant-silo (cement) w/dust collector, 40 T capacity subject to Reasonable Precautions

PART I: <u>FILE REVIEW PRIOR TO INSPECTION</u>	(check ☑ box for each o	only one question)
Date of last inspection: Did the emissions unit use reasonable precautions during the last inspection? If not: a. Did the inspector perform a general VE test (20% opacity)? b. If tested: ()% opacity. Were the visible emissions < 20% opacity? N/A c. What caused the problem(s) (if known)?	Yes	☐ No ☐ No ☐ No
PART II: FIELD OBSERVATIONS – Rule 62-296.414(2), F.A.C.	(check 🗹	only one
Unconfined Emissions from Truck Loading and Unloading, Hoppers, Storage and Conveying Equipment, Conveyor Drop Points, Roads, Parking Areas, Stock Piles, and Yards	box for each	•
1. Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfi emissions by:	ned	
 a. Management of roads, parking areas, stock piles, and yards, which shall include one or more of the 1) paving and maintenance of roads, parking areas, stock piles, and yards?	- Yes	□ No
particulate matter?	_	☐ No ☐ 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 <u>not</u> being taken: a. Did the inspector perform a general VE test (20% opacity)? b. If tested: ()% opacity. Were the visible emissions < 20% opacity? c. What caused the problem(s) (if known)?	Yes Yes	☐ No ☐ No

Emissions Unit Section

2 -CCB Plant-aggregate & sand storage bin subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION	(check 🗹 box for each q	only one question)
Date of last inspection: Did the emissions unit use reasonable precautions during the last inspection? If not: a. Did the inspector perform a general VE test (20% opacity)? b. If tested: ()% opacity. Were the visible emissions < 20% opacity? N/A c. What caused the problem(s) (if known)?	- Tes	☐ No ☐ No ☐ No
PART II: FIELD OBSERVATIONS – Rule 62-296.414(2), F.A.C. Unconfined Emissions from Truck Loading and Unloading, Hoppers, Storage and	(check ☑ box for each o	only one question)
Conveying Equipment, Conveyor Drop Points, Roads, Parking Areas, Stock Piles, and Yards		
 Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfir emissions by: 	ned	
 a. Management of roads, parking areas, stock piles, and yards, which shall include one or more of the 1) paving and maintenance of roads, parking areas, stock piles, and yards?	Yes	□ No
control emissions?	_	□ No
4) reduction of stock pile height, or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles?	_	□ 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 <u>not</u> being taken: a. Did the inspector perform a general VE test (20% opacity)? b. If tested: ()% opacity. Were the visible emissions < 20% opacity? c. What caused the problem(s) (if known)?	- Yes - Yes	☐ No ☐ No

Facility Section (continued)

CONFIRMATION OF GENERAL PERMIT ELIGIBILITY	(check 🗹 box for each	
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? b. 25 tons per year or more of any combination of hazardous air pollutants? c 100 tons per year or more of any other regulated air pollutant?	Yes	 No No No No
2. Does this facility include: a. Any emission units or activities not covered by the applicable air general permit (with the exception units and activities that are exempt from permitting pursuant to subsection Rule 62-210.300(3) or Rule 62-4.040, F.A.C.)? If YES, what non-exempt units or activities?		□ No
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?		□ No
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? b. 23,000 gallons of gasoline? c. 44 million standard cubic feet on natural gas? d. 1.3 million gallons of propane? e. Or an equivalent prorated amount if multiple fuels are used onsite (use equation below)?	-	 No No No No No No No
gal diesel/yr + gal gasoline/yr + MM SCF nat. gas/yr + MM gal propagation of the second secon		?
4. Has the owner/operator maintained, available for inspection, site-wide records of monthly fuel consum for each consecutive 12-period for the past 5 years?		☐ No
GENERAL CONDITIONS	(check 🗹 box for each	
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?		
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?		□ No
3. Has the owner or operator allowed you, as the duly authorized representative of the Department, acces to the facility at reasonable times to inspect and test and to determine compliance with the air general permit and Department rules?	SS	□ No

RELOCATABLE PLANT:	(check D	only one
1. Is the facility: stationary ☐; relocatable ☐; or consisting o	box for and	ch question)
concrete batching and/or nonmetallic mineral processing pl		2.)
2. Is the relocatable concrete batching plant used to mix cemes	nt and	
soil for onsite soil augmentation or stabilization?	Yes	☐ No
(If YES, answer 2. a and 2.b; if NO, answer question 2.c be a. Did the owner or operator notify the appropriate Departm		
e-mail, fax, or written communication at least one busing		☐ No
b. Did the owner or operator transmit a Facility Relocation		
to the Department or Local Air Program no later than five c. Did the owner or operator transmit a Facility Relocation.		∐ No
to the appropriate Department or Local Air Program at le		☐ No
3. If the relocatable plant was co-located at a facility with a se	parate air construction or air operation permit.	
and the relocatable batch plant is not included as an emission	ons unit in that separate permit:	
a. Was the relocatable batch plant being used for a non-rout If YES, what was the purpose?	ine purpose (i.e, there is no repeated usage)? Yes	☐ No
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 durat	ion? Yes	∐ No
<u>CHANGES</u>	(check 5	only one
		only one ch question)
Administrative Changes:	box for each	•
	box for each ber of the facility or authorized representative not	•
Administrative Changes: 1. Were there any changes in the name, address, or phone nun associated with a change in ownership or with a physical re operations comprising the facility; or any other similar mine	box for each ber of the facility or authorized representative not location of the facility or any emissions units or or administrative change at the facility? Yes	ch question)
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COMMENTS: 90 day Initial Inspection. Proceeded to 18660 Cortez Blvd facility not currently located in Brooksville. I contacted facility spoke and with Mr. Josh Pryor. According to Mr. Pryor he received a letter saying they did not need any permits, but that the letter took 4 months to arrive. I assured Mr. Pryor that Tanktek, Inc. dba Envirotek did indeed have an Air General Permit. I provided Mr. Pryor with my email address so he could send a copy of the letter he received to me by email. According to Mr. Pryor, the facility is currently located in the city of Alachua at 13201 Rachel Blvd. The facility operated in Brooksville from April to June. The equipment has been at the Rachel Blvd location for about 1 week. On August 9, 2012, Mr. Pryor sent an email to me

acknowleding that the letter sent to him did indeed indicate that the facility did not need a wastewater permit. On August 14, 2012, I contacted Mr. Pryor by phone to provide some compliance assistance in reference to the requirements in his facility's Concrete Batch Air General Permit(AGP). I discussed Initial and Annual VE Testing requirements and relocation notification requirements. According to the information provided to me by Mr. Pryor, his facility just completed the job they had at 13201 Rachel Blvd. in Alachua and he is preparing the equipment for relocation back to their storage yard in Tampa, Florida. I informed Mr. Pryor he would need to follow-up our conversation with a relocation notification in reference to moving the facility and explained that the facility should have testing the next time they operate. Mr. Pryor indicated that they do not at this time have another job lined up for the facility and he does not anticipate the facility will have another job prior to December 31, 2012. I provided Mr. Pryor with some website information which describes the requirements of his AGP and read Rule 62-210.310(5)(b)3.b. of the Florida Administrative Code (F.A.C.) to him. I explained that the websites include links to the Relocation Notification Form mentioned in Rule 62-210.310(5)(b)3.b. and committed to following our conversation up with an email to provide links to the information we discussed. In my follow-up email on August 15, 2012, I provided Mr. Pryor with links to the AGP Concrete Batch Plant webpage, 62-210 F.A.C., and the Relocation Notification Forms page. In my email, I requested that Mr. Pryor provide a Relocation Notification Form for each of the moves the facility has had since they were located at the Cortez Blvd. address noted above and described what should be included in a missed VE testing notification. On August 19, 2012, Mr. Pryor submitted the relocation notification forms and a missed testing letter as requested in my August 15th email (see attached).

From: Josh Pryor
To: Akins, Wendy

Date: Thursday, August 09, 2012 11:05:14 AM

Attachments: Approved Air Permit.pdf

You were right it was wastewater. Attached is your permit

Josh Pryor, EI Envirotek Inc 3007 N. 50th St. Tampa, FI 33619

Office: 813-909-0040 Cell: 813-545-5236

Email: jpryor@envirotek1.com

 From:
 Akins, Wendy

 To:
 "Josh Pryor"

 Cc:
 Henry, Danielle D.

Subject: Envirotek, Inc., Facility No. 7775716

Date: Wednesday, August 15, 2012 3:44:00 PM

Mr. Pryor,

Thank you very much for taking the time from your busy schedule to speak with me today. Please accept this email as follow-up to our conversation.

I wanted provide you with a link to the website we discussed: <u>Air General Permits - Concrete</u> <u>Batching Plants - Division of Air Resource Management - FDEP</u>

I reviewed the workbook myself and was able to confirm that the information associated with relocation of a facility like yours is not included in the workbook. Therefore, I have enclosed some additional information for you that will assist you with that requirement in your Air General Permit Entitlement.

The rule I read to you on the phone about relocation notifications is located in the Florida Administrative Code at 62-210.310(5)(b)3.b., and can be found in the following document link: http://www.dep.state.fl.us/air/rules/fac/62-210.pdf

The relocation notification form can be found online in the following location: <u>Forms - Relocation - Division of Air Resource Management - FDEP</u>

This webpage includes a link to a map of the state and contact information for all the District and Local Air Programs. It is important that you forward your relocation notification forms and required documentation to the appropriate office based on where the facility is moving to, not where it is currently at.

I have spoken with Mrs. Danielle Henry, SWD Compliance Manager, about your facility. She has requested that you forward by email or fax one relocation notification form and required documentation for your facility's move from Brooksville to Alachua and a separate relocation notification for your move from Alachua to Hillsborough County. Danielle has requested that I update your facility location history and then forward the forms and documentation to the appropriate offices for you. Future relocation notifications and relocation notification forms should be provided to the appropriate District/Local Air Program.

As discussed, Envirotek, Inc. will need to provide a missed testing letter to the Department in December if you are unable to complete your required Initial Testing before 12/31/2012. The letter should include the following information:

- Facility name and Facility Identification No. as provided in the subject line from this email,
- Reason testing was not conducted, and
- A statement which provides the Department with a commitment to conduct the required testing when the facility begins operating again.

Please let me know if you have any questions or concerns in reference to the request for information in this email or any of the requirements of your General Permit Entitlement. I would be glad to assist you.

Thanks again for your time,

Wendy D. Akins

Environmental Specialist Southwest District Air Program FL Dept. of Environmental Protection Agency 813-632-7600 X145

Please take a few minutes to share your comments on the service you received from the department by clicking on this link: <u>DEP Customer Survey</u>.

"This staff assessment is preliminary and is designed to assist in the review of the information provided prior to final agency action. The comments provided herein are not the final position of the Department and may be subject to revision pursuant to additional information and further review".

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communication may therefore be subject to public disclosure.

From: Josh Pryor [mailto:jpryor@envirotek1.com] Sent: Thursday, August 09, 2012 10:58 AM

To: Akins, Wendy

Subject:

You were right it was wastewater. Attached is your permit

Josh Pryor, EI Envirotek Inc 3007 N. 50th St. Tampa, FI 33619

Office: 813-909-0040 Cell: 813-545-5236

Email: jpryor@envirotek1.com



Current Facility Information

Department of Environmental Protection

Division of Air Resource Management

FACILITY RELOCATION NOTIFICATION

Submit to DEP district office or local air program office that has permitting authority for the area in which the facility is to be relocated.

(DEP/Local Note: Update existing facility location data in ARMS. Do not create new facility record.)

1. Facility ID: 7775716.00	2. Permit /Project Number:	
Facility Owner or Operato Envirotek	N.A or:	
Facility Name: Presto 17		
5. Current or Most Recent Fa 18660 Cortez Blvd	ncility Street Address or Location Description:	
6. City: Tampa	7. County: Hernando	
8. Shutdown Date at This Lo 6/15/2012	cation:	
Proposed New Facility Locat	ion	
13201 Rachael Blvd	Location Description (do not enter a post office box number):	
2. City: Alachua	3. County: Alachua	
4. List other air permitted ope	erations at this location (if any):	
Facility ID	Permit/Project Number	
5. Startup Date at New Locati 08/07/2012	on:	
6. Facility Comment:		M. Harrison and M. Harrison an

Owner/Authorized Representative or Responsible Official

Name and Title of Owner/Authorship Josh Pryor-Project Manager	orized Representative or Respon	sible Official:	
Organization/Firm: Envirotek			
Street Address or P. O. Box: 3007 N. 50th St.			
City: Tampa	State: FI	Zip: 33619	
Telephone: (813) 909-0040	Fax: (813) 909-0042		

Facility Contact

Name and Title of Facil Josh Pryor-Project Manage	ity Contact:		
Organization/Firm: Envirotek			***************************************
Street Address or P. O. 3007 N. 50th St.	Box:		
City: Tampa	State: Fl	Zip: 33619	
Telephone: (813) 909-0040	Fax: (813) 909-0042		

Certification

Statement by Owner/Authorized Representative or Responsible Official:

I hereby certify that the information given in this report is correct to the best of my knowledge.

Supplemental Requirements

1. Provide a scale map (e.g., the relevant portion of a USGS topographic map) showing the proposed new location of the facility and points of air pollutant emissions in relation to roads and other features of the surrounding area.

8/19/2012 Date

2. If relocating to a different DEP district or local air permitting office area of jurisdiction, provide a copy of the most recent compliance test report.



Current Facility Information

3. Facility Owner or Operator:

1. Facility ID:

7775716.00

Department of Environmental Protection

Division of Air Resource Management

FACILITY RELOCATION NOTIFICATION

Submit to DEP district office or local air program office that has permitting authority for the area in which the facility is to be relocated.

(DEP/Local Note: Update existing facility location data in ARMS. Do not create new facility record.)

2. Permit /Project Number:

Envirotek	
Facility Name: Copeland Sausage (Former Presto	17)
Current or Most Recent Facility13201 Rachael Blvd	Street Address or Location Description:
6. City: Alachua	7. County: Alachua
8. Shutdown Date at This Location 8/17/12	:
Proposed New Facility Location	
3007 N. 50th St.	ion Description (do not enter a post office box number):
2. City:	3. County:
Tampa	Hillsborough
4. List other air permitted operation	is at this location (if any):
Facility ID	Permit/Project Number
Startup Date at New Location:	
08/17/2012	
6. Facility Comment:	
	or storage only. Not to be utilized at this location

Owner/Authorized Representative or Responsible Official

Name and Title of Own Josh Pryor-Project Manage	er/Authorized Representative or Respons	sible Official:	
Organization/Firm: Envirotek			
Street Address or P. O. 3007 N. 50th St.	Box:		
City: Tampa	State: FI	Zip: 33619	
Telephone: (813) 909-0040	Fax: (813) 909-0042		

Facility Contact

Name and Title of Facil Josh Pryor-Project Manage	ity Contact: r		
Organization/Firm: Envirotek			
Street Address or P. O. 3007 N. 50th St.	Box:		
City: Tampa	State: Fl	Zip: 33619	
Telephone: (813) 909-0040	Fax: (813) 909-0042		

Certification

Statement by Owner/Authorized Representative or Responsible Official:

I hereby certify that the information given in this report is correct to the best of my knowledge.

Supplemental Requirements

- 1. Provide a scale map (e.g., the relevant portion of a USGS topographic map) showing the proposed new location of the facility and points of air pollutant emissions in relation to roads and other features of the surrounding area.
- 2. If relocating to a different DEP district or local air permitting office area of jurisdiction, provide a copy of the most recent compliance test report.



August 19, 2012

Wendy D. Akins
Environmental Specialist
Southwest District Air Program
FL Dept. of Environmental Protection Agency

Ph: 813-632-7600 X145

Email: Wendy.Akins@dep.state.fl.us

Re: Missing Visible Emissions Testing Letter

Concrete Plant – Facility ID# 7775716 (Presto 17 & Copeland Sausage)

Dear Mrs. Akins:

In accordance with your request, TankTek, Inc. dba EnviroTek is providing this letter of explanation for the visible emissions testing that was not performed for the concrete batch plant operations that were conducted at the Presto 17 project in Brooksville, Florida and the Copeland Sausage project located Alachua, Florida. Both operations utilized the same concrete batch plant with Facility ID#7775716.

Envirotek was unaware of the testing requirements for this plant and will for all future projects perform the required visible emissions testing per EPA Test Method 9, 40 CFR 60 Appendix A and as specified in Rule 62-297.310, F.A.C.

Please contact me at 813-909-0040 with any questions you may have.

Respectfully Submitted, EnviroTek

Josh Pryor