



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 7775719 **INS2 DATE:** 09/14/2012 **ARRIVE:** ~09:45 AM **DEPART:** ~11:00 AM
FUI DATE: 09/18/2012 **ARRIVE:** ~08:45 AM **DEPART:** ~10:00 AM

FACILITY NAME: OUTDOOR LIVING CENTERS OF AMERICA

FACILITY LOCATION: 3000 MAINE AVE
LAKELAND 33801-9764

OWNER/AUTHORIZED REPRESENTATIVE: DANNY MURO **PHONE:** (863)486-8036 ext 102
Email: production@outdoorlivingcenters.com **Mobile:** (863)242-7271
CONTACT NAME: **PHONE:**
Email: **Mobile:**
ENTITLEMENT PERIOD: 5/25/2012 / 5/25/2017
 (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): Daniel (Danny) H. Muro

Brief Notes: This inspection is the facility's initial walkthrough inspection and visible emissions (VE) test audit of EU001, which is a low profile cement silo with baghouse. EU001 is the only permitted EU at this facility. The silo can hold approx. 30 tons of cement. This facility produces bricks and similar building materials. The VE test for EU001 was originally scheduled to be conducted on Friday, 09/14/2012, but due to malfunction of the silo's baghouse, the test had to be rescheduled to Tuesday, 09/18/2012. I, Amaury Betancourt, was present on both days. The VE test report was received on 09/18/2012 and is IN compliance with the requirements of this facility's current permit, the initial operation permit 7775719-001-AG.

2. Is the Authorized Representative still DANNY MURO? ----- Yes ..No
 If no, who is?: N/A

NOTE: Mr. Frank Van Leer was previously owner/authorized rep., but changed to Danny Muro.
 If different, did the facility provide an administrative update within 30 days? ----- Yes ..No

3. Is the facility contact still ? ----- N/A 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

Emissions Unit Section

1-CCB Plant-silo (cement) wsilotop baghouse, 200 bbl subject to 5% Opacity Limit

PART I: FILE REVIEW PRIOR TO INSPECTION

(check [X] only one box for each question)

- 1. Date of last inspection: N/A
2. Past Visible Emissions (VE) tests:
a. Was a VE test performed within each of the past 4 calendar years?
b. Has a VE test been performed yet within the current calendar year?
c. If first year of operation, was a VE test performed within 30 days of commencing operation?
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?
f. Did the report state the actual silo loading rate during emissions testing?
g. What was the actual silo loading rate?
h. If weigh hopper(batcher) emissions controlled by the silo dust collector, did the report state whether or not batching occurred during emissions testing?
i. Did the test report state the actual batching rate during emissions testing?
j. What was the actual batching rate?
k. Did the emissions unit demonstrate compliance with the 5% opacity limit during the last VE test?-- 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 [X] only one box for each question)

- 1. Was a visible emissions test conducted by the facility for this unit during this site visit?
a. Was the visible emissions test conducted according to EPA Method 9?
b. The visible emission test resulted in an opacity of 0% for the highest six-minute average.
c. Did the visible emissions test demonstrate compliance with the 5% opacity limit?
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?
e. If silo loaded, was the minimum loading rate of 25 tons/hour achievable in practice?
f. What was the silo loading rate?
g. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector?
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?
2) What was the batching rate?
3) What was the batching duration?
2. Was a visible emissions test conducted by the inspector for this unit during this site visit?
a. Was the visible emissions test conducted according to EPA Method 9?
b. The visible emission test resulted in an opacity of 0% for the highest six-minute average.
c. Did the visible emissions test demonstrate compliance with the 5% opacity limit?
d. What was the process rate?

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? ----- 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**
 **Facility only began operating on approximately June 1, 2012, so there are no records for the past 5 years.

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***
 ***Former owner/authorized representative for this facility, Mr. Frank Van Leer, works for company, but is no longer owner/authorized representative of this facility since approx. 05/14/2012 (prior to facility startup). This was confirmed via telephone conversation between Mr. Van Leer and me, Amaury Betancourt, on 08/24/2012.

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

09/14/2012 and 09/18/2012

Inspector's Name (Please Print)

Date of Inspection

09/14/2017

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: I, Amaury Betancourt, conducted an initial walkthrough inspection on 09/14/2012 of the Outdoor Living Centers of America facility in Lakeland, Polk County, Florida, Air General Operating Facility ID 7775719. The current and only air permit for this facility is 7775719-001-AG. This facility produces bricks and similar construction materials. This facility began operation on

approximately June 1, 2012, but was unaware that the silo baghouse at this facility required a visible emissions (VE) test to be conducted on the baghouse within 30 days of startup. On 08/24/2012, I contacted the listed owner/authorized representative, Mr. Frank Van Leer, to inquire about this facility and its startup date, at which point Mr. Van Leer stated that the facility started operations approximately on 06/01/2012. I told Mr. Van Leer that a VE test must be scheduled for the silo baghouse at this facility as soon as possible. Mr. Van Leer told me that, although he was no longer the owner/authorized representative for this facility, he would contact the appropriate personnel to schedule a VE test as soon as possible. Mr. Van Leer e-mailed me on 08/28/2012 with the information for the current facility contact, Mr. Daniel (Danny) H. Muro. On 08/28/2012, Mr. Marvin Scott of Environmental Engineering Consultants, Inc. scheduled a VE test to be conducted on 09/14/2012 on the silo baghouse at this facility.

On 09/06/2012, Mr. Muro provided me with additional details of his contact information. This has been updated in this facility's electronic file and in the Air Resource Management System (ARMS) database of the FDEP. Mr. Muro also provided me with his approximate start date as owner/authorized representative of this facility. I updated this date as the start date for Mr. Muro as owner/authorized representative of this facility. I have also entered this date as the end date for Mr. Van Leer's position as owner/authorized representative of this facility.

During the inspection on 09/14/2012, Mr. Muro showed me the batching equipment in the facility. The batching equipment was not operating during the inspection. All the batching equipment is kept indoors. Mr. Muro explained further, in a telephone call on 10/16/2012, that the batching equipment is enclosed so that there are no emissions from the batching equipment. The building is mostly enclosed, except for several doorways that are kept open and several garage-like doors near the front side of the building that are kept open. The baghouse for the silo is activated inside the facility building. It is activated before the silo is loaded. The silo does not have the appearance of a typical tall, cylindrical silo. It is shaped like an upside-down pyramid. The baghouse sits in front of the silo and has a cylindrical shape. The baghouse and silo are both manufactured by Belgrade Steel Tank Co. A photograph of this silo with baghouse is attached to this inspection report. This type of silo, according to the manufacturer's website, is a low profile silo. Mr. Muro was uncertain of the capacity of the silo: the permit states 200 barrels, and Mr. Muro believes it is a 30 ton capacity silo. I e-mailed Mr. Muro on 10/16/2012 to confirm the capacity and am awaiting a response as of 10/16/2012.

During this inspection, Mr. Muro showed me some of the records for the tons of material received by this facility on different dates. The records are kept electronically.

I also noted during the inspection that the two back supports (legs) of the silo are resting on metal block-like structures. The front two supports are resting on concrete slabs. I asked Mr. Muro about the metal supports because I observed that the blocks are hollow and appeared to be relatively thin. Mr. Muro stated that he believes that the blocks are steel. On 10/16/2012, I e-mailed Mr. Muro about these supports, stating that although the supports are not directly an air pollution issue, I was concerned about these metal block supports. I asked him that, if he can provide some assurance about the structural integrity of these supports, such as the type of steel, thickness, and load-bearing capacity of the steel, this would be important information to include in the facility's file.

During the inspection on 09/14/2012, the VE test had to be rescheduled before it started because the baghouse appeared to malfunction. A malfunction notice was received by the FDEP later that day, on 09/14/2012, indicating that the test would have to be rescheduled. Marvin Scott e-mailed the FDEP on 09/14/2012 to reschedule the test to 09/18/2012 at 09:00 AM, which was approved on 09/17/2012 by the FDEP.

The baghouse appeared to be functioning properly during the VE test on 09/18/2012. The VE Test report was received later during the day on 09/18/2012. EU001 passed this VE Test. During this site visit, finished products, such as bricks, and bricks that were being dried in ambient air inside the building, were visible on the property. Based on this initial walkthrough inspection and followup inspection with VE test audit, this facility appears to be IN compliance with its permit conditions. Although I have not received a response yet to my e-mail to Mr. Muro on 10/16/2012, this information will be updated in the facility's electronic file and in the ARMS database once received.####