



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 0870074 **DATE:** 01-16-2014 **ARRIVE:** _____ **DEPART:** _____

FACILITY NAME: LAROCCO CCB PLANT-OVERSEAS HWY.

FACILITY LOCATION: 101075 Overseas Hwy
 KEY LARGO 33037-4540

OWNER/AUTHORIZED REPRESENTATIVE: FRANK REINER **PHONE:** (305)453-0368
Email: larocco743@att.net **Mobile:**
CONTACT NAME: FRANK REINER **PHONE:** (305)453-0368
Email: larocco743@att.net **Mobile:**
ENTITLEMENT PERIOD: 3/14/2013 / 3/14/2018
(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): Allison Larocco
 Brief Notes: _____

2. Is the Authorized Representative still FRANK REINER? ----- 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 FRANK REINER? ----- Yes ..No
 If no, who is?: _____

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 – Silo - Baghouse subject to Reasonable Precautions

PART I: FILE REVIEW PRIOR TO INSPECTION

1. Date of last inspection: _____
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:

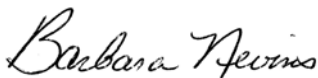
3. Since the last registration form submittal has there been
 - a. Installation of any new process equipment? ----- Yes No
 - b. Alterations to existing process equipment without replacement? ----- Yes No
 - c. Replacement of existing equipment with equipment that is substantially different? ----- Yes 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

Barbara Nevins

January 16, 2014

Inspector's Name (Please Print)

Date of Inspection



January 16, 2019

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: Larocco previously had another concrete batch plant at another location. The plant at that location is inactive. The previous plant was a small portable unit. The current plant is a much larger stationary silo. Allison said that it holds two tankers of concrete. This is the first inspection of this concrete batch plant. There was no loading of the silo, or loading out into batch trucks during the inspection. The batch plant is run by electricity. There were no diesel or gasoline operated emission units on site. Rock and sand is stored and processed for size on site, but Ms. Lorocco said there is no rock crusher. I explained that a rock crusher would require a Department permit, if one is installed in the future.

A file review revealed that A VE test was performed by Arlington Environmental on April 23, 2013. The consultant reported zero emissions and a loading rate of 37.9 tons/hr. Notification of the planned test was submitted to the Department in advance as required.

A file review revealed that there is neither a Department industrial wastewater permit, nor a National Pollution Discharge Elimination System (NPDES) Industrial facility permit. We discussed the possible need to obtain one or both permits. I explained that any required permits must be obtained as soon as possible, since the Concrete Batch Plant was active. I provided brochures for the NPDES program. Ms. Larocco said that they are currently working with the County and the State Department of Economic Opportunity (DEO), regarding industrial use of the property. She thought that they might not move forward with additional Department permits until this issue was resolved.

Following the inspection, I emailed contact information to the facility, for both programs.

For IW permitting and general questions about NPDES:

Nolin Moon, Professional Engineer

FL Dept. of Environmental Protection

South District Office

2295 Victoria Avenue, Suite 364

Fort Myers, FL 33901-2896

Telephone (239)322-5672 Email: nolin.moon@dep.state.fl.us,

For NPDES: The brochures provided include address and phone number in Tallahassee. In addition, I emailed a link to the NPDES webpage. <http://www.dep.state.fl.us/water/stormwater/npdes/index.htm>

Regarding industrial wastewater, Ms. Larocco said that the concrete trucks are not washed out at the property. The ground was wet from using a water hose at the silo. It appeared that water run-off from the silo area would be to a large borrow pit on site.