



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

Facility: City of Safety Harbor
DBA/Site Name: Public Works Department
ADDRESS: 1200 Railroad Avenue, Safety Harbor, FL
ARMS NO: 1030554 001
PERMIT NO: 1030554-001-AG
DISTRICT: Southwest
CONTACT PHONE: 727-724-1510
Expiration Date: 8/10/18
Renewal Date: 7/11/18
Test Date:

EMISSION UNIT DESCRIPTION: Concrete Batching Plant: Cemen Tech Model SCDA 4.5-50 cement batch mixer (December of 2001) and the associated Cemen Tech upright silo and CTI Baghouse Model S-250 S/N:30376IHC.

INSPECTION DATE: 9/11/13
INSPECTION COMPLIANCE STATUS (check [] only one box)
[X] In Compliance; [] Minor Non-Compliance; [] Significant Non-Compliance

PART I: General Review:

1. Permit File Review [X] Yes [] No
2. Introduction and Entry [X] Yes [] No
Comments: Met w/ facility contact Mr. Bob Farris, consultant Lynn Robinson, and operator Glenn Goss during inspection and attempted initial test. Mr. Farris and Mr. Goss answered my questions relative to the inspection.
3. Is the Authorized Representative still: Andrew Crews? [X] Yes [] No
Comments: The e-mail address is: acrews@cityof safety harbor.com
4. Is the facility contact still: Bob Farris? [X] Yes [] No
Comments: The e-mail address is: bfarris@cityof safety harbor.com
5. If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [] Yes [] No [62-210.310(2)(d), F.A.C.]

PART II: TESTING REQUIREMENTS - Rule 62-296.414, F.A.C.

(check [] appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

Compliance Demonstration
1. [X] New Facilities / [] New Process Equipment - (permitted pursuant to Rule 62-296.414(4)(a), F.A.C., Air General Permits)
Did this facility demonstrate initial compliance no later than 30 days after beginning operation? [] Yes [X] No
2. [] Existing Facilities - (permitted pursuant to Rule 62-296.414(4)(a), F.A.C., Air General Permits)
In order to demonstrate annual compliance, was an annual visible emissions test conducted on each dust collector exhaust point within 365 days (annually thereafter) of the previous visible emissions compliance test? [] Yes [] No
Test Reports
3. Do the submitted visible emission tests demonstrate compliance with the 5 percent opacity limit? [] Yes [] No
The last visible emission test, conducted on _____ resulted in an opacity of _____ % for the highest six minute average. [62-296.414(1) F.A.C.]
4. Was the department notified at least 15 days prior to the test? [62-297.310(4)(a)9. F.A.C.] [] Yes [] No
5. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed? [62-297.310(8)(b) [] Yes [] No
6. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C] [] Yes [] No
7. 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, or at least at the minimum 25 tons per hour rate,

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(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

- unless such rate is unachievable in practice? [62-296.414(3), F.A.C.] ----- Yes No
8. Are emissions from a weigh hopper (batcher) operation controlled by the silo dust collector? (If answer to this question is "Yes", then continue on to questions 8.a) and 8.b) below. If answer is "No" then skip to question 9.)----- Yes No
- a) Was the batching operation in operation during the visible emissions test? [62-296.414(3)(c), F.A.C.] ----- Yes No
- b) During the visible emissions test, was the batching rate representative of the normal batching rate and duration? [62-296.414(3)(c), F.A.C.] ----- Yes No
9. If emissions from the weigh hopper (batcher) operation are controlled by a dust collector, which is separate from the silo dust collector, are the visible emissions tests of the weigh hopper (batcher) dust collector while batching at a rate that is representative of the normal batching rate and duration? [62-296.414(3)(d), F.A.C.] - ----- Yes No
10. Was a visible emissions test(s) conducted by the inspector during this site visit according to EPA Method 9? Yes No(SC)
- a) The visible emission test resulted in an opacity of _____% for the highest six minute average.
- b) Did the test indicate the facility is operating in compliance with the 5% opacity standard? ----- Yes No

PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.310(5)(b), F.A.C.

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

1. Is this facility: 1) a stationary; 2) a relocatable; or does it have: 3) both, stationary and relocatable concrete batching and/or nonmetallic mineral processing plants? (Please check only one box.)
2. For any combination of stationary or relocatable concrete batching plants, located with other concrete batching plants or nonmetallic mineral processing plants:
- a) Are there any additional nonexempt units located at this facility? [62-210.310(5)(b)4.a., F.A.C.]----- Yes No
- b) Is the total combined annual facility-wide fuel usage of all plants less than or equal to the fuel usages listed below: [62-210.310(5)(b)4.b., F.A.C.] ----- Yes No
- 1) 275,000 gallons of diesel fuel – usage equals _____ gallons
- 2) 23,000 gallons of gasoline – usage equals _____ gallons
- 3) 44 million standard cubic feet on natural gas – usage equals _____ cubic feet
- 4) 1.3 million gallons of propane – usage equals _____ gallons
- 5) or an equivalent prorated amount if multiple fuels are used onsite – usage equals _____ % of all fuels
3. Does the owner/operator of the concrete batching plant submitting this registration maintain records to account for site-wide fuel consumption for each calendar month and each consecutive twelve (12) months, and are these records available for Department inspection for a period of at least five (5) years? [62-210.310(5)(b)4.d., F.A.C.] ----- Yes No

Relocation Notification - (Rule 61-210.310(5)(b)3.b., F.A.C.)

1. Is the relocatable concrete batching plant used to mix cement and soil for onsite soil augmentation or stabilization?—(if your answer is YES, please proceed to 1. a) thru 1.b) below) ----- Yes No
- a) Did the owner or operator notify the Department by telephone, e-mail, fax, or written communication at least one (1) 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 no later than five (5) business days following a relocation? ----- Yes No
- If your answer to number 1. above is NO, proceed to 2. below
2. Did the owner or operator transmit a Facility Relocation Notification Form (DEP No. 62-210.900(6)) at least five (5) business days prior to relocation? ----- Yes No

PART IV: Unconfined Emissions - 62-296.414(2)

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

1. Does the owner/operator of the concrete batching plant take reasonable precautions to control unconfined emissions ----- Yes No
- Which of the following methods are used:
- 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

PART IV: Unconfined Emissions - 62-296.414(2)

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

- 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

PART V: General Procedure Requirements and Conditions

(check appropriate box(es), if a shaded box is checked, this would indicate noncompliance)

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? [62-210.310(2)(d), F.A.C.] ----- Yes No

Permit Effective Period – [62-210.310(3)(a), F.A.C.]

- 1. Is the general permit for this facility still within the 5 year effective period? ----- Yes No
- 2. Did the facility submit the new re-registration form at least 30 days prior to permit expiration? ----- Yes No

New or Modified Process Equipment or Change in Ownership

- 1. Since the last registration form submittal has there been [62-210.310 (2)(b)2]
 - a) installation of any new process equipment?----- Yes No
 - b) alterations to existing process equipment without replacement?----- Yes No
 - c) replacement of existing equipment substantially different than that noted on the most recent notification form?----- Yes No
 - d) Change in ownership----- Yes No
- If any of the answers to 1a) – 1d) is **Yes**, a new registration form and appropriate fee should have been submitted 30 days prior to the change.----- Yes No

Noncompliance Notice: - [62-210.310(3)(i), F.A.C.]

- 1. Did the facility have any instances where they were unable to comply with or will be unable to comply with any condition or limitation of the air general permit? ----- Yes No
 If the answer is **Yes**, proceed to a) and b).
 - a) Did the owner or operator provide immediate notification to the Department? ----- Yes No
 - b) Did the notification include:
 - 1. A description of and cause of noncompliance?----- Yes No
- 2. The period of noncompliance, including dates and times; or if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance? ----- Yes No

PART VI: Comments

O&M Plan

The pollution control equipment shall be operated and maintained in accordance to the operation and maintenance (O&M) plan. The O&M plan shall include, but is not limited to:

- (1) Operating parameters of the pollution control device;
- (2) Time table for the routine maintenance of the pollution control device as specified by the manufacturer;
- (3) Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation;
- (4) A list of the type and quantity of the required spare parts for the pollution control device which are stored on the premises of the permit applicant;
- (5) A record log which will indicate, at a minimum:
 - a. When maintenance and observations were performed;
 - b. What maintenance and observations were performed; and
 - c. Who performed said maintenance and observations.
 - d. Acceptable parameter ranges for each operational check.

[Pinellas County Code, Subsection 58-128]

Reviewed records for the months of _____ N/A - Initial Plan review performed and recommended changes during inspection. ___

Comments:

Inspection was performed on the same day that the initial VE Compliance Testing was scheduled to occur. Visible emissions > 5% were observed at the initiation of the load/ test. The test was immediately halted. An equipment check was performed and a second attempt was made. This 2nd attempt last ~ 15 minutes with emissions > 5% continuously occurring. The loading was then halted again. The inspector conducted a 4 minute VE during this second attempt resulting in 51.6% opacity. More maintenance was performed to attempt and identify the problem. A third silo loading attempt was observed occurring then halted again.
The facility takes multiple reasonable precautions to prevent unconfined emissions including utilizing a vacuum sweeper truck as needed. An expansion of the batcher's partial enclosure will be installed in the near future.
The facility was kept in good condition.
I provided corrections to be made to the facility's O&M Plan submittal during the inspection.
<i>Exit Interview:</i>
Mr. Farris stated that he would halt the testing if they were unable to correct the problem. I suggested that the facility submit a self-reported non-compliance notification per their permit requirements detailing the occurrence.
I contacted Mr. Farris via phone on 9/12/13. Mr. Farris stated that he cancelled the VE compliance test after several more attempts to load the silo resulted in visible emissions. Mr. Farris stated that the silo received most of the intended 25 tons at the delivery on 9/11/13. He was still uncertain exactly why the control device was not operating correctly. He plans to fully inspect the EU and work closely with the manufacturer to resolve the problem.
I emailed Mr. Crews on 9/12/13 to find out if the facility would be able to comply with initial performance test requirements per 62-296.414(4)(a)
PCAQD received a notification on 9/17/13 from Southern Environmental Service, Inc. stating that the initial VE test scheduled for 9/11/13 was postponed due to equipment malfunction. The letter states that a test will be rescheduled "when the next cement truck delivery is planned."
I emailed Mr. Crews and Mr. Farris on 9/23/13 asking for an approximate time until when the test would be rescheduled as well as how much cement material was loaded into the silo during the 9/11/13 equipment malfunction.

Brennan Farrington
Inspector's Name

9/11/13
Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

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