

F.A. RECEIPT # 1704051

MAY 14, 2010

RECEIVED  
MAY 17 2010

CONCRETE BATCHING PLANT  
AIR GENERAL PERMIT REGISTRATION FORM

Bureau of Air Monitoring  
& Mobile Sources

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

**Instructions:** To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form)

0610026-004

Registration Type

Check one:

**INITIAL REGISTRATION** - Notification of intent to:

- Construct and operate a proposed new facility.
- Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

**RE-REGISTRATION** (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
- Continue operating the facility after a change of ownership.
- Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

COMPARISON  
OF ARMS DATA  
& FORM DATA  
INDICATES  
CHANGES OF  
EQUIPMENT  
N.

Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

- All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s):  
G.P. # 0610026-003-AG (recently expired)
- No air operation permits currently exist for this facility.

General Facility Information

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

Russell Concrete, Inc.

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

Vero Beach facility

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: 1400 10th Avenue

City: Vero Beach, FL

County: Indian River

Zip Code: 32960-5726

Facility Start-Up Date (Estimated start-up date of proposed new facility.)(N/A for existing facility)

N/A

**Owner/Authorized Representative**

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: Lyle Bartholomew, President

Owner/Authorized Representative Mailing Address

Organization/Firm: Russell Concrete, Inc.

Street Address: 1400 10th Avenue

City: Vero Beach, FL

County: Indian River

Zip Code: 32960-5726

Owner/Authorized Representative Telephone Numbers

Telephone: (772) 562-3384

Fax: (772) 778-6763

Cell phone (optional): (772) 360-9920

**Facility Contact (If different from Owner/Authorized Representative)**

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)

Print Name and Title: - same -

Facility Contact Mailing Address

Organization/Firm:

Street Address:

City:

County:

Zip Code:

Facility Contact Telephone Numbers

Telephone:

Fax:

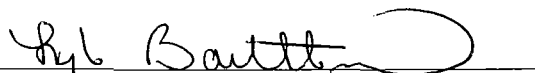
Cell phone (optional):

**Owner/Authorized Representative Statement**

This statement must be signed and dated by the person named above as owner or authorized representative

*I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof.*

*I will promptly notify the Department of any changes to the information contained in this registration form.*

  
Signature

5-13-2010  
Date

**Type of Facility**

Check one:

<input checked="" type="checkbox"/> <b>Stationary Facility</b>	<input type="checkbox"/> <b>Relocatable Facility</b>
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**Type(s) of Reasonable Precautions Used to Prevent Unconfined Emissions**

Check all precautions to be used for the management of roads, parking areas, stock piles and yards:

<input checked="" type="checkbox"/> <b>Pave Roads</b>	<input checked="" type="checkbox"/> <b>Pave Parking Areas</b>	<input checked="" type="checkbox"/> <b>Pave Yards</b>
<input checked="" type="checkbox"/> <b>Maintain Roads/Parking/Yards</b>	<input checked="" type="checkbox"/> <b>Use Water Application</b>	<input checked="" type="checkbox"/> <b>Use Dust Suppressant</b>
<input checked="" type="checkbox"/> <b>Remove Particulate Matter</b>	<input checked="" type="checkbox"/> <b>Reduce Stock Pile Height</b>	<input checked="" type="checkbox"/> <b>Install Wind Breaks</b>

Check all precautions to be used for the management of drop points to trucks:

<input type="checkbox"/> <b>Spray Bar</b>	<input checked="" type="checkbox"/> <b>Chute</b>	<input type="checkbox"/> <b>Enclosure</b>
	<input checked="" type="checkbox"/> <b>Partial enclosure</b>	

**Description of Reasonable Precautions**

Below, or as an attachment to this form, provide details of all types of reasonable precautions to be used to prevent unconfined emissions at the facility.

Large Aggregate is rail car delivered and dumped into below grade hoppers. Sand is dump truck delivered and dumped into below grade hoppers. This method of aggregate delivery and handling minimizes the potential for wind blown dust. All large aggregate is then delivered by conveyor into large, cylindrical, open top, silos. Sand aggregate is kept on a flat surface in low mounds behind a wall which provides a windbreak during prevailing winds. Sand is transported to a loading hopper by front end loader. The sand is irrigated during times of low humidity and high winds.

Except for the truck wash-out area, all: drives; parking; and yard areas are paved. A "Tennant" SE model 95 (S.N. # 2016) power sweeper is used to remove particulates from the paved areas. The sweepings are mixed in with "tailings" from the truck washout treatment facility. The unpaved truck washout area is watered down during times of low humidity and high winds. The paved yard area has a stormwater collection system with a solids containment structure installed before the discharge location. This also assists with the removal of particulate matter from the facility grounds.

Truck washout is directly discharged into a wet treatment system, reducing the possibility of diluted cement slurry to dry out and be blown off-site.

The site and associated equipment is well maintained and has passed all visible emissions testing required by previous air quality permitting.

### **Description of Facility**

Below, or as an attachment to this form, provide a description of the concrete batching plant operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

#### **ELIGIBILITY FOR USE OF PERMIT:**

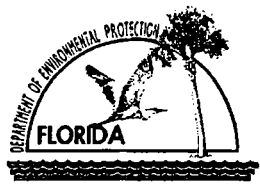
This facility is a concrete batch plant for "Redi-Mix" delivery of concrete, which complies with the general permitting requirements of FAC Chapter 62-210.310(5)(b), except for the referenced requirement of FAC Chapter 62-210.310(3)(a) for "re-registration" of the facility prior to 30 days before expiration of the existing general air permit. During this time of low concrete production and sales, the unintended laps of the air general permit was due to staffing lay-offs and altered duty assignments. It was never the intent or a decision to let the air permit expire. Using the reasonable precautions for unconfined emissions, the facility has no potential to emit 100 tons of regulated air pollutants from the site. Finally, the facility has no other emission units or activities not covered by the applicable air general permit for a concrete batch plant.

Cement is truck delivered, off-loaded and stored directly into two fully contained silos. Silo no. 1 is a "Fanning-Schuett", 11 ft. diameter, 500 Bbl., steel container. Silo no. 2 is a "Fanning-Schuett", 11 ft. diameter, 600 Bbl., steel container. Each silo is fitted with a "MikroPul" Mikro Pulsaire Bin Vent, fabric bag type air vent filter. The filter for Silo no.1 is a style 6B with 63 sq. ft. of filter area. The serial no. is 65-H-1664. The filter for Silo no.2 is a style 8B with 84 sq. ft. of filter area. The serial no. is 204113H1.

Cement is discharged and weighed in a partially enclosed hopper which has no separate filtering system. The cement and other dry aggregate are dumped from the hopper through a chute directly into the trucks. Observance of this operation indicates no need for any additional air pollution prevention equipment.

All visible emissions testing of the cement transfer process as required by previous air quality permitting has passed the opacity requirements without failure.

184846 MAY 14 2010



# Department of Environmental Protection

## Division of Air Resource Management

### CONCRETE BATCHING PLANT AIR GENERAL PERMIT REGISTRATION FORM

RECEIVED

MAY 17 2010

3700000  
DEPT OF ENVIRONMENTAL PROTECT  
MAY 14 10  
3700000  
HATGOSJANK  
FLORIDA STATE TREASURY  
CONCENTRATION ACCT # 100505

Bureau of Air Quality  
& Mobile Sources

#### Part I. Procedures and Conditions for Use of Air General Permits

The Department of Environmental Protection ("Department" or "DEP") has established an "air general permit" at Florida Administrative Code ("F.A.C.") Rule 62-210.310(5)(b) for concrete batching plants. An air general permit is an authorization by rule to construct or operate a specific type of air pollutant emitting facility. Use of such authorization by any individual facility does not require action by the Department. The terms and conditions of the air general permit are set forth in the rule, rather than in a separately issued air construction or air operation permit.

The owner or operator of an eligible facility comprising one or more concrete batching plants may register to use the air general permit at Rule 62-210.310(5)(b), F.A.C., by following the general procedures given at Rule 62-210.310(2), F.A.C., the text of which is provided below. The owner or operator shall notify the Department of the facility's intent to use this general permit by submitting Part II of this registration form to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Questions concerning this air general permit or the registration process may be directed to any such office or to the Department's small business assistance program at 1-800-SBAP-HLP (1-800-722-7457).

The owner or operator of a facility who properly registers to use this air general permit, and who is not denied use of the air general permit by the Department, is authorized to construct and operate the facility in accordance with the general terms and conditions of Rule 62-210.310(3), F.A.C., and the specific terms and conditions of Rule 62-210.310(5)(b), F.A.C. The text of these two rules is also provided below, followed by definitions of words and phrases used in the rules and on this form. A facility using this air general permit shall not be entitled to use more than one air general permit for the facility.

#### Rule 62-210.310(2), F.A.C.

**(2) General Procedures.** This subsection sets forth general procedures for use of any of the air general permits provided at subsections 62-210.310(4) and (5), F.A.C.

**(a) Determination of Eligibility.** The owner or operator of a proposed new or existing facility shall determine the facility's eligibility to use an air general permit under this rule. A facility is eligible to use an air general permit under this rule if it meets any specific eligibility criteria given in the applicable air general permit at subsection 62-210.310(4) or (5), F.A.C., and the following general criteria.

1. The facility shall not emit nor have the potential to emit 10 tons per year or more of any hazardous air pollutant, 25 tons per year or more of any combination of hazardous air pollutants, or 100 tons per year or more of any other regulated air pollutant; be collocated with, or relocated to, such a facility; or create such a facility in combination with any other collocated facilities, emissions units, or pollutant-emitting activities, including any such facility, emissions unit, or activity that is otherwise exempt from air permitting.

2. The facility shall not contain any emissions units or activities not covered by the applicable air general permit, except:

a. Units and activities that are exempt from permitting pursuant to subsection 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.; and

b. Units and activities that are authorized by another air general permit where such other air general permit and the air general permit of interest specifically allow the use of one another at the same facility.

**(b) Registration.** The owner or operator who intends to construct or operate an eligible facility under the authority of an air general permit shall complete and submit the proper registration form to the Department for the specific air general permit to be used, as provided in subsection 62-210.920(1) or (2), F.A.C. The registration form shall be accompanied by the appropriate air general permit processing fee pursuant to Rule 62-4.050, F.A.C. (*\$100 as of the effective date of this form*)

**1. Initial Registration.** Registration of a facility which is not currently authorized to construct or operate under the terms and conditions of an air general permit is classified as an initial registration. Any existing, individual air operation permit(s) authorizing operation of the facility must be surrendered by the owner or operator, effective upon the first day of use of the air general permit.

**2. Re-registration.** Registration of a facility which is currently authorized to operate under the terms and conditions of an air general permit is classified as a re-registration. An owner or operator shall re-register the facility in the following cases:

- a. Impending expiration of the term for air general permit use;
- b. Change of ownership of all or part of the facility;
- c. Proposed new construction, modification, or other equipment change that requires registration pursuant to paragraph 62-210.310(2)(e), F.A.C.; and
- d. Any other change not considered an administrative correction under paragraph 62-210.310(2)(d), F.A.C.

**(c) Use of Air General Permit.**

1. Unless the Department denies use of the air general permit, the owner or operator of an eligible facility may use the air general permit for such facility 30 days after giving notice to the Department. The first day of the 30-day time frame, day one, is the date the Department receives the proper registration form and processing fee. The last day of the 30-day time frame, day 30, is the date the owner or operator may use the air general permit, provided there is no agency action to deny use of the air general permit.

2. To avoid lapse of authority to operate, an owner or operator intending to use, or continue to use, an air general permit must submit the proper registration form and processing fee at least 30 days prior to expiration of the facility's existing air operation permit or air general permit.

**(d) Administrative Corrections.** Within 30 days of any minor changes requiring corrections to information contained in the registration form, the owner or operator shall notify the Department in writing. Such changes shall include:

1. Any change 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
2. Any other similar minor administrative change at the facility.

**(e) Equipment Changes.** The owner or operator shall maintain records of all equipment changes. In the case of installation of new process or air pollution control equipment, alteration of existing process or control equipment without replacement, or replacement of existing process or control equipment with equipment substantially different in terms of capacity, method of operation, material processed, or intended use than that noted on the most recent registration form, the owner or operator shall submit a new and complete air general permit registration form for the facility with the appropriate fee pursuant to Rule 62-4.050, F.A.C. to the Department, provided, however, that any change that would constitute a new major stationary source, major modification, or modification that would be a major modification but for the provisions of paragraph 62-212.400(2)(a), F.A.C., shall require authorization by air construction permit.

**(f) Enforcement of Ineligibility.** If a facility using an air general permit at any time becomes ineligible for the use of the air general permit, or if any facility using an air general permit is determined to have been initially ineligible for use of the air general permit, it shall be subject to enforcement action for constructing or operating without an air permit under subsection 62-210.300(1) or (2), F.A.C., or Chapter 62-213, F.A.C., as appropriate.

**Rule 62-210.310(3), F.A.C.**

**(3) General Conditions.** All terms, conditions, requirements, limitations, and restrictions set forth in this subsection are “general permit conditions” and are binding upon the owner or operator of any facility using an air general permit provided at subsection 62-210.310(4) or (5), F.A.C.

(a) The owner or operator’s use of an air general permit is limited to five (5) years. Prior to the end of the five (5) year term, the owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C. To avoid lapse of authority to operate, the owner or operator must submit the proper registration form and processing fee at least thirty (30) days prior to expiration of the facility’s existing air general permit. The air general permit re-registration form shall contain all current information regarding the facility.

(b) Use of an air general permit is not transferable and does not follow a change in ownership of the facility. Prior to any sale, other change of ownership, or permanent shutdown of the facility, the owner or operator is encouraged to notify the Department of the pending action. The new owner or operator who intends to continue using the air general permit for the facility shall re-register with the Department pursuant to subparagraph 62-210.310(2)(b)2., F.A.C..

(c) The air general permit is valid only for the specific type of facility and associated emissions units and pollutant-emitting activities indicated.

(d) The air general permit does not authorize any demolition or renovation of the facility which involves asbestos removal. The air general permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., or 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

(e) The general permit does not authorize any open burning.

(f) The owner or operator shall not circumvent any air pollution control device or allow the emission of air pollutants without the proper operation of all applicable air pollution control devices.

(g) The owner or operator shall maintain the authorized facility in good condition. Throughout the term of air general permit use, the owner or operator shall 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.

(h) The owner or operator shall allow a duly authorized representative of the Department access to the facility at reasonable times to inspect and test, upon presentation of credentials or other documents as may be required by law, to determine compliance with the air general permit and Department rules.

(i) If, for any reason, the owner or operator of any facility operating under an air general permit does not comply with or will be unable to comply with any condition or limitation of the air general permit, the owner or operator shall immediately provide the Department with the following information:

1. A description of and cause of noncompliance; and
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.

(j) Use of an air general permit does not relieve the owner or operator of the facility from liability and penalties when the construction or operation of the authorized facility causes harm or injury to human health or welfare; causes harm or injury to animal, plant or aquatic life; or causes harm or injury to property. It does not allow the owner or operator to cause pollution in contravention of Florida law.

(k) The air general permit conveys no title to land or water, nor does it constitute state recognition or acknowledgment of title.

(l) The air general permit does not convey any vested rights or exclusive privileges, nor does it authorize any injury to public or private property or any invasion of personal rights. It does not authorize any infringement of federal, state, or local laws or regulations.

(m) Use of the air general permit shall be effective until suspended, revoked, surrendered, expired, or nullified pursuant to this rule and Chapter 120, F.S.

(n) Use of the air general permit does not eliminate the necessity for the owner or operator to obtain any other federal, state or local permits that may be required, or relieve the owner or operator from the duty to comply with any federal, state or local requirements that may apply.

**Rule 62-210.310(5)(b), F.A.C.**

**(b) Air General Permit for Facilities Comprising Concrete Batching Plants.**

1. For purposes of this air general permit, the term "concrete batching plant" shall have the meaning given at Rule 62-296.414, F.A.C., and the term "site" shall mean one or more contiguous or adjacent properties under control of the same person (or persons under common control).

2. A facility comprising one (1) or more stationary or relocatable concrete batching plants shall be eligible to use this air general permit provided it meets the general eligibility criteria of paragraph 62-210.310(2)(a), F.A.C.

3. A facility using this air general permit shall comply with the general conditions given at subsection 62-210.310(3), F.A.C., and the following specific conditions.

a. The facility shall comply with all applicable provisions of Rule 62-296.414, F.A.C.

b. The owner or operator of any equipment used to mix cement and soil for onsite soil augmentation or stabilization shall notify the Department by telephone, e-mail, fax, or written communication at least one (1) business day prior to changing location and transmit (by e-mail, fax, post, or courier) a Facility Relocation Notification Form (DEP Form No. 62-210.900(6)) to the Department no later than five (5) business days following relocation. The owner or operator of any other relocatable concrete batching plant proposing to change location shall transmit a Facility Relocation Notification Form to the Department at least five (5) business days prior to relocation.

4. A facility using this air general permit may collocate with other facilities that separately registered for, and are also using, the concrete batching plant air general permit, and with facilities using the nonmetallic mineral processing plant air general permit at paragraph 62-210.310(5)(e), F.A.C., even if under the control of different persons, provided the following conditions are met.

a. The collocation site does not contain any emissions units and pollutant-emitting activities other than concrete batching plants using air general permits, nonmetallic mineral processing plants using air general permits, and nonmetallic mineral processing plants or other emissions units and pollutant-emitting activities exempted from permitting pursuant to subsection 62-210.300(3), F.A.C., or Rule 62-4.040, F.A.C.

b. The total fuel consumption by all emissions units at the collocation site shall not exceed 275,000 gallons of diesel fuel, 23,000 gallons per year of gasoline, 44 million standard cubic feet per year of natural gas, or 1.3 million gallons per year of propane, or an equivalent prorated amount if multiple fuels are used.

c. If multiple fuels are used, the equivalent prorated amount of each fuel burned shall not exceed the total amount of such fuel allowed to be burned, as given in sub-subparagraph b., multiplied by a fuel percentage. The fuel percentage is the percentage ratio of the amount of the fuel burned at the facility to the total amount of such fuel allowed to be burned at the facility pursuant to sub-subparagraph b. The sum of the fuel percentages for all fuels burned by the facility shall not exceed one hundred percent (100%).

d. The owners or operators of all collocated concrete batching plants and nonmetallic mineral processing plants shall maintain records to account for site-wide fuel consumption for each calendar month and each consecutive twelve (12) months. The owners or operators shall retain these records, available for Department inspection, for a period of at least five (5) years.

5. Under the authority of this air general permit, a relocatable concrete batching plant may perform a non-routine task, such as making concrete for a construction project, at a facility with authorization by individual air construction or non-Title V air operation permit, without revision to the facility's individual air permit. Any such concrete batching plant shall remain at the individually permitted facility for no more than six (6) months from the day it relocates to such facility. The owner or operator of such concrete batching plant shall keep records to indicate how long the plant has been at the permitted facility.



**Rule 62-296.414, F.A.C.**

**Concrete Batching Plants.** The following requirements apply to new and existing emissions units producing concrete and concrete products by batching or mixing cement and other materials. This rule also applies to facilities processing cement and other materials for the purposes of producing concrete, and to equipment used to mix cement and soil for onsite soil augmentation or stabilization.

(1) Stack Emissions. Emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment shall be controlled to the extent necessary to limit visible emissions to 5 percent opacity.

(2) Unconfined Emissions. The owner or operator shall take reasonable precautions to control unconfined emissions from hoppers, storage and conveying equipment, conveyor drop points, truck loading and unloading, roads, parking areas, stock piles, and yards as required by paragraph 62-296.320(4)(c), F.A.C. For concrete batching plants the following shall constitute reasonable precautions:

(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, and yards.
2. Application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions
3. Removal of particulate matter from roads and other paved areas under control of the owner or operator to mitigate reentrainment, and from building or work areas to reduce airborne particulate matter.
4. Reduction of stock pile height or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles.

(b) Use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck.

(3) Test Methods and Procedures. All emissions tests performed pursuant to the requirements of this subsection shall comply with the following requirements.

(a) The reference test method for visible emissions shall be EPA Method 9, as described at 40 CFR, Part 60, Appendix A, adopted and incorporated by reference at Rule 62-204.800, F.A.C.

(b) Test procedures shall conform to the procedures specified in Rule 62-297.310, F.A.C. All test results shall be reported to the Department in accordance with the provisions of Rule 62-297.310, F.A.C.

(c) Visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. If emissions from the weigh hopper (batcher) operation are also controlled by the silo dust collector, the batching operation shall be in operation during the visible emissions test. The batching rate during the emissions test shall be representative of the normal batching rate and duration. Each test report shall state the actual silo loading rate during emissions testing and, if applicable, whether or not batching occurred during emissions testing.

(d) If emissions from the weigh hopper (batcher) operation are controlled by a dust collector which is separate from the silo dust collector, visible emissions tests of the weigh hopper (batcher) dust collector exhaust point shall be conducted while batching at a rate that is representative of the normal batching rate and duration. Each test report shall state the actual batching rate during emissions testing.

(4) Frequency of Testing.

(a) The owner or operator of any concrete batching plant using an air general permit shall have a performance test conducted for visible emissions for no later than thirty (30) days after commencing operation, and annually thereafter

(b) The owner or operator of any concrete batching plant operating under the authority of an air construction permit or air operation permit shall have a performance test conducted for visible emissions for each dust collector exhaust point prior to submitting the application for an initial air operation permit, and annually thereafter.

**Rule 62-210.200, F.A.C., Definitions**

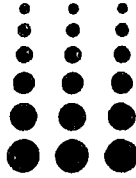
**"Emissions Unit"** - Any part or activity of a facility that emits or has the potential to emit any air pollutant.

**"Facility"** - All of the emissions units which are located on one or more contiguous or adjacent properties, and which are under the control of the same person (or persons under common control).

**"Owner" or "Operator"** - Any person or entity who or which owns, leases, operates, controls or supervises an emissions unit or facility.

**"Relocatable Facility"** - A facility such as, but not limited to, an asphalt plant, portable power generator, or concrete batch plant, which is designed to be physically moved to, and operated on, different sites by being wholly or partially dismantled and re-erected in essentially the same configuration. It shall not be operable while in transit.

**"Unconfined Emissions"** - Emissions which escape and become airborne from unenclosed operations or which are emitted into the atmosphere without being conducted through a stack.



**SOUTH FLORIDA ENVIRONMENTAL SERVICES**  
*Air Quality Specialists*

RECEIVED  
MAY 14 10  
3100000  
DEPT OF ENVIRONMENTAL PROTECTION  
CONCENTRATION/ACC. #1009039811

MAY 14 10

3100000  
DEPT OF ENVIRONMENTAL PROTECTION  
CONCENTRATION/ACC. #1009039811

**VISIBLE EMISSIONS COMPLIANCE TEST REPORT**

**PREPARED FOR:**

RUSSELL CONCRETE  
1400 10<sup>TH</sup> AVENUE  
VERO BEACH, FL 32960

**CONCRETING:**

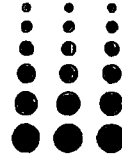
VISIBLE EMISSIONS TEST PROGRAM  
TWO CEMENT SILOS  
RUSSELL CONCRETE  
1400 10<sup>TH</sup> AVENUE  
VERO BEACH, FL 32960  
FACILITY ID: **0610081**  
DECEMBER 3, 2009

**PREPARED BY:**

SOUTH FLORIDA ENVIRONMENTAL SERVICES  
2257 VISTA PARKWAY, SUITE 25  
WEST PALM BEACH, FL 33411

**PROJECT NO:**

09-565



**SOUTH FLORIDA ENVIRONMENTAL SERVICES**  
*Air Quality Specialists*

**VISIBLE EMISSIONS COMPLIANCE TEST REPORT**

**PREPARED FOR:**  
Russell Concrete  
1400 10<sup>th</sup> Avenue  
Vero Beach, FL 32960

**CONCRENING:**  
Visible Emissions Test Program  
Two Cement Silos  
Russell Concrete  
1400 10<sup>th</sup> Avenue  
Vero Beach, FL 32960

**PREPARED BY:**  
South Florida Environmental Services  
2257 Vista Parkway, Suite 25  
West Palm Beach, FL 33411

This is to certify that the information contained in this report is true and accurate to the best of my knowledge.

*Jodi Beck*

\_\_\_\_\_  
Jodi Beck  
Project Manager

*12/8/09*

\_\_\_\_\_  
Date

**COMPENDIUM:**

On December 3, 2009 South Florida Environmental Services performed visible emissions compliance testing for Russell Concrete at its Vero Beach facility. The emissions test was conducted on the two (2) cement silo baghouses that service the facility. The test was performed while the silos were loaded with cement at the rate of about 10 to 12 PSI.

All testing was conducted in accordance with EPA Method 9 as found in 40CFR60 Appendix A, as amended.

Jodi Beck was the certified Visible Emissions evaluator during the testing. Mr. Jacky Saucerman of Russell Concrete was responsible for facility operation.

During the testing, the highest six-minute opacity average for both silos was 0.0%, with an overall opacity average of 0.0% (See Table 1-1).

**Table 1-1: Summary of visible emissions test results.**

<b>Location</b>	<b>Highest 6-minute Average (%)</b>	<b>Overall Average (%)</b>	<b>Limiting Standard (%)</b>
North Silo	0.0	0.0	5
South Silo	0.0	0.0	5



**VISIBLE EMISSIONS TESTING PROGRAM**  
Field Data Sheets



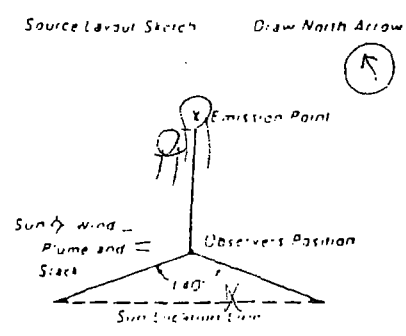


# South Florida Environmental Services

SOURCE NAME			OBSERVATION DATE				START TIME				STOP TIME			
Russell Concrete			12/3/09				10:52				11:22			
ADDRESS			SEC				SEC							
1400 10 <sup>th</sup> Ave			MIN	0	15	30	45	MIN	0	15	30	45		
CITY			1	0	0	0	0	31						
Vero Beach			2	0	0	0	0	32						
STATE			3	0	0	0	0	33						
FL			4	0	0	0	0	34						
ZIP			5	0	0	0	0	35						
32960			6	0	0	0	0	36						
PHONE			7	0	0	0	0	37						
SOURCE ID NUMBER			8	0	0	0	0	38						
PROCESS EQUIPMENT			9	0	0	0	0	39						
Loading Cement			10	0	0	0	0	40						
OPERATING MODE			11	0	0	0	0	41						
12 psi			12	0	0	0	0	42						
CONTACT EQUIPMENT			13	0	0	0	0	43						
Baghouses			14	0	0	0	0	44						
OPERATING MODE			15	0	0	0	0	45						
Normal			16	0	0	0	0	46						
DESCRIBE EMISSION POINT			17	0	0	0	0	47						
Baghouses on top of Silo			18	0	0	0	0	48						
HEIGHT ABOVE GROUND LEVEL			19	0	0	0	0	49						
50 ft			20	0	0	0	0	50						
HEIGHT RELATIVE TO OBSERVER			21	0	0	0	0	51						
50 ft			22	0	0	0	0	52						
DISTANCE FROM OBSERVER			23	0	0	0	0	53						
180'			24	0	0	0	0	54						
DIRECTION FROM OBSERVER			25	0	0	0	0	55						
30°			26	0	0	0	0	56						
DESCRIBE EMISSIONS			27	0	0	0	0	57						
None			28	0	0	0	0	58						
EMISSION COLOR			29	0	0	0	0	59						
N/A			30	0	0	0	0	60						
PLUME TYPE CONTINUOUS <input type="checkbox"/>			AVERAGE OPACITY FOR HIGHEST PERIOD 0											
FUGITIVE <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>			NUMBER OF READINGS ABOVE % WERE											
WATER DROPLETS PRESENT			RANGE OF OPACITY READINGS											
NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			MINIMUM 0 MAXIMUM											
IF WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>			OBSERVER'S NAME (PRINT)											
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED			John Beck											
N/A			OBSERVER'S SIGNATURE											
DESCRIBE BACKGROUND			John Beck											
Sky			DATE 12/3/09											
BACKGROUND COLOR			ORGANIZATION											
Gray			SFES											
SKY CONDITIONS			I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS											
cloudy			SIGNATURE											
WIND SPEED			TITLE											
0-5 mph			DATE											
WIND DIRECTION			CERTIFIED BY											
Variable			ETA											
AMBIENT TEMP			DATE											
~75'			VERIFIED BY											
WET BULB TEMP			DATE											
RH percent														
Source Layout Sketch														
Draw North Arrow														
Sun's Wind ...														
Plume and ...														
Sketch														
Sun's location														



# South Florida Environmental Services

SOURCE NAME Russell Concrete			OBSERVATION DATE 12/3/09				START TIME 10:52				STOP TIME 11:22			
ADDRESS 14W 10th Ave			SEC		MIN		SEC		MIN		SEC		MIN	
			0	15	30	45	0	15	30	45	0	15	30	45
			1	0	0	0	0	31						
CITY VERO BEACH			2	0	0	0	0	32						
STATE FL			3	0	0	0	0	33						
ZIP 32960			4	0	0	0	0	34						
PHONE			5	0	0	0	0	35						
SOURCE ID NUMBER			6	0	0	0	0	36						
PROCESS EQUIPMENT Loading Cement			7	0	0	0	0	37						
OPERATING MODE 10 PSI			8	0	0	0	0	38						
CONTROL EQUIPMENT Baghouse			9	0	0	0	0	39						
OPERATING MODE Normal			10	0	0	0	0	40						
DESCRIBE EMISSION POINT Baghouse on top of silo (North silo)			11	0	0	0	0	41						
HEIGHT ABOVE GROUND LEVEL 60'			12	0	0	0	0	42						
HEIGHT RELATIVE TO OBSERVER 60'			13	0	0	0	0	43						
DISTANCE FROM OBSERVER 180'			14	0	0	0	0	44						
DIRECTION FROM OBSERVER 30°			15	0	0	0	0	45						
DESCRIBE EMISSIONS None			16	0	0	0	0	46						
EMISSION COLOR N/A			17	0	0	0	0	47						
PLUME TYPE CONTINUOUS <input type="checkbox"/>			18	0	0	0	0	48						
FUGITIVE <input type="checkbox"/>			19	0	0	0	0	49						
INTERMITTENT <input type="checkbox"/>			20	0	0	0	0	50						
WATER DROPLETS PRESENT NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>			21	0	0	0	0	51						
IF WATER DROPLET PLUME ATTACHED <input type="checkbox"/>			22	0	0	0	0	52						
DETACHED <input type="checkbox"/>			23	0	0	0	0	53						
POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED N/A			24	0	0	0	0	54						
DESCRIBE BACKGROUND Sky			25	0	0	0	0	55						
BACKGROUND COLOR Gray			26	0	0	0	0	56						
SKY CONDITIONS Cloudy			27	0	0	0	0	57						
WIND SPEED 0-5			28	0	0	0	0	58						
WIND DIRECTION Variable			29	0	0	0	0	59						
AMBIENT TEMP ~75			30	0	0	0	0	60						
WET BULB TEMP			AVERAGE OPACITY FOR HIGHEST PERIOD 0											
RH percent			NUMBER OF READINGS ABOVE % WERE											
Source Layout Sketch Draw North Arrow 			RANGE OF OPACITY READINGS MINIMUM 0 MAXIMUM 0											
			OBSERVER'S NAME (PRINT) Todd Beck											
COMMENTS			OBSERVER'S SIGNATURE Todd Beck							DATE 12/3/09				
			ORGANIZATION SFES											
I HAVE RECEIVED A COPY OF THESE OPACITY OBSERVATIONS SIGNATURE			CERTIFIED BY ETA							DATE				
			TITLE			DATE				VERIFIED BY				DATE



**VISIBLE EMISSIONS TESTING PROGRAM**  
Field Loading Sheets



ve/d

# CONTINENTAL

## HEIDELBERGCEMENT Group

CONTINENTAL FLORIDA MATERIALS, INC.  
2700 EISENHOWER BLVD  
P. O. BOX 13128  
FORT LAUDERDALE, FL 33316  
For Inquiries Call: 1-800-432-0135 • Fax: 954-523-1490

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - NOT NEGOTIABLE

TICKET NO. 603821

ORIGIN	DATE	TIME	CUST NO.	CUST ORDER NO.	REQUESTED DELIVERY TIME
1601044680	12/03/09	03:20	1211270	17799	

**SOLD TO:**  
CONTINENTAL FLA MATERIALS  
  
From: Florida Rock - Newberry

**SHIP TO:**  
CONTINENTAL FLA MATERIALS

WEIGHT	POUNDS	TONS	DATE	TIME
--------	--------	------	------	------

SILO NO.	SCALE NO.	LOADER	CERTIFIED	MILLTEST
5		CHRIS R		

GROSS	70540	LBS
TARE	27540	
NET	51700	

CARRIER	TRUCK	TRAILER
CONTINENTAL FLA MAT	NEH2A	NEH36A

ITEM NO.	ITEM DESCRIPTION	PALLETS	BAGS	POUNDS	TONS
EN0021	AASHTO/ASTM TYPE I AND II  <i>3 TANKER - Silo North</i>				25.85
<b>TOTAL</b>					

DELIVERY INFORMATION	OTHER COMMENTS
	Guaranteed to meet 115 2000 / 4 1/2 inch specs - 10 TUSSELL CONCRETE OVER SPPAL

CERTIFY	SEAL NO.
	610100

<p><b>CAUTION</b></p> <p>MSDS Provided upon request. See backside for our product warning and specification warranty and buyers exclusive remedy.</p> <p>The description and weight indicated on this Bill of Lading are correct, subject to verification by the Eastern Weighing &amp; Inspection Bureau - Southern Weighing &amp; Inspection Bureau - Trans-Continental Freight Bureau or Western Weighing &amp; Inspection Bureau according to agreement.</p> <p>CONTINENTAL FLORIDA MATERIALS, INC. - Shipper</p> <p><b>CHARGES ARE PREPAID UNLESS MARKED - NOT PREPAID</b></p>	<p><b>SIGNATURES</b></p> <p>RECEIVED ABOVE MATERIAL IN GOOD CONDITION</p>
	<p><b>CARRIER</b></p> <p><i>K. Donna Post</i></p>
	<p><b>CUSTOMER</b></p>

# CONTINENTAL

## HEIDELBERGCEMENT Group

CONTINENTAL FLORIDA MATERIALS, INC.  
 2700 EISENHOWER BLVD  
 P. O. BOX 13128  
 FORT LAUDERDALE, FL 33316

For Inquiries Call: 1-800-432-0135 • Fax: 954-523-1490

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - NOT NEGOTIABLE

TICKET NO. **603824**

ORIGIN	DATE	TIME	CUST NO.	CUST ORDER NO.	REQUESTED DELIVERY TIME
01601044686	12/03/09	05:17	1211270	17799	

**SOLD TO:**  
 CONTINENTAL FLA MATERIALS  
  
 From: Florida Rock - Newberry

**SHIP TO:**  
 CONTINENTAL FLA MATERIALS

WEIGHT	POUNDS	TONS	DATE	TIME
GROSS	73680	LBS		
TARE	27700			
NET	51980			

SILO NO.	SCALE NO.	LOADER	CERTIFIED	MILLTEST
5		CHRIS R		

CARRIER	TRUCK	TRAILER
CONTINENTAL FLA 901		FL-174

ITEM NO.	ITEM DESCRIPTION	PALLETS	BAGS	POUNDS	TONS
EN0021	ASHTO/ASTM TYPE I AND II  <i>5 TANKER                      Silo                      SOUTH</i>				21.58
<b>TOTAL</b>					

DELIVERY INFORMATION	OTHER COMMENTS
	Guaranteed to meet ALL SCDOT & FDOT specs for ALL FULL CONCRETE TANK BEACH

CERTIFY	SEAL NO.
	214560

<p><b>CAUTION</b></p> <p>MSDS Provided upon request. See backside for our product warning and specification warranty and buyers exclusive remedy.</p> <p>The description and weight indicated on this Bill of Lading are correct, subject to verification by the Eastern Weighing &amp; Inspection Bureau – Southern Weighing &amp; Inspection Bureau – Trans-Continental Freight Bureau or Western Weighing &amp; Inspection Bureau according to agreement.</p> <p>CONTINENTAL FLORIDA MATERIALS, INC. - Shipper</p>	<p><b>SIGNATURES</b></p> <p>RECEIVED ABOVE MATERIAL IN GOOD CONDITION</p>
	<p>CARRIER</p> <p><i>RS Dehl</i></p> <p>CUSTOMER</p>

CHARGES ARE PREPAID UNLESS MARKED - NOT PREPAID

**VISIBLE EMISSIONS EVALUATOR CERTIFICATE**



# VISIBLE EMISSIONS EVALUATOR

This is to certify that

**JODI BECK**

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue.

**375486**

CERT NUMBER

**7/8/2009**

DATE OF SCHOOL

**WEST PALM BEACH, FL**

SCHOOL LOCATION

**1/7/2010**

CERTIFICATION EXP DATE

**BEC827897**

STUDENT ID NUMBER

*Michael W. Sanford*

MANAGER OF TRAINING SERVICES

## EASTERN TECHNICAL ASSOCIATES

**JODI BECK**

**BEC827897** STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below

Customer Support

Debbie or Sheila

919-878-3188

[www.eta-is-opacity.com](http://www.eta-is-opacity.com)

**WEST PALM BEACH, FL**

SCHOOL LOCATION

**7/8/2009**

DATE OF SCHOOL

**375486**

CERT NUMBER

**JAXF08**

LAST LECTURE

**1/7/2010**

CERTIFICATION EXP DATE

BEARER

**CARTER ASSOCIATES, INC.**  
 1708 21<sup>st</sup> Street  
 Vero Beach, FL 32960  
 (772) 562-4191 - (772) 562-7180 Fax

**LETTER OF TRANSMITTAL**

TO

Florida D.E.P.  
 3800 Commonwealth Blvd., MS-77  
 Tallahassee, FL 32399

DATE 05/13/10	JOB NO. 10-17E
ATTENTION: Mr. Dick Dibble	
RE: Russell Concrete Air Permit registration Vero Beach and Winter Beach Facilities Expired Permit Nos. 061-0026 and 061-0081	

WE ARE SENDING YOU:  Attached  Under separate cover via \_\_\_\_\_ the following items:  
 Shop drawings  Prints  Plans  Samples  Specifications  
 Copy of letter  Change Order  Other \_\_\_\_\_

COPIES	DATE	NO.	DESCRIPTION
1	05/13/10		Completed Application form for Vero Beach Facility
1	05/13/10		\$100.00 Application Fee Check no. 71060 for V.B. Facility
1	12/03/09		Most Recent Emissions Test Results for V.B. Facility
1	05/13/10		Completed Application form for Winter Beach Facility
1	05/13/10		\$100.00 Application Fee Check no. 71059 for W.B. Facility
1	12/03/09		Most Recent Emissions Test Results for W.B. Facility


THESE ARE TRANSMITTED as checked below:

For approval  Approved as submitted  Resubmit \_\_\_\_\_ copies for approval  
 For your use  Approved as noted  Submit \_\_\_\_\_ copies for distribution

REMARKS:

Please feel free to contact me at your earliest possible convenience should you have any comment or questions regarding this submittal.

COPY TO: Lyle Bartholomew – Russell Concrete

SIGNED   
 Steve Snoberger, P.E.