



**CONCRETE BATCHING PLANT**



**COMPLIANCE INSPECTION CHECKLIST**

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

**AIRS ID#:** 1030036 002      **DATE:** 3/23/06      **ARRIVE:** 12:50pm      **DEPART:** 2:45pm

**FACILITY NAME:** CEMEX, Inc.

**FACILITY LOCATION:** 2063 20th Avenue S.E.

Largo, FL

**RESPONSIBLE OFFICIAL:** Denise Corrales?

**PHONE:** 813-933-6711

**CONTACT NAME:** Denise Corrales?

**PHONE:** 813-933-6711

**REMITTANCE YEAR:** 2008      **ENTITLEMENT PERIOD:** 6/23/03 / 06/23/08  
(effective date)      (end date)

**PART I: INSPECTION COMPLIANCE STATUS** (check  only one box)

IN COMPLIANCE       MINOR Non-COMPLIANCE       SIGNIFICANT Non-COMPLIANCE

**PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C.**

(check  appropriate box(es))

**Stack Emissions**

1. Were visible emissions tests conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?-----  Yes  No
2. Are emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment controlled to the extent necessary to limit visible emissions to 5 percent opacity?-----  Yes  No
3. 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, unless such rate is unachievable in practice?-----  Yes  No
4. Are emissions from the weigh hopper (batcher) operation controlled by the silo dust collector? (If answer to this question is "Yes", then continue on to questions 4.a) and 4.b) below. If answer is "No" then skip 4.a) and 4.b) and continue on to question 5.)-----  Yes  No
  - a) Was the batching operation in operation during the visible emissions test?-----  Yes  No
  - b) During the visible emissions test, was the batching rate representative of the normal batching rate and duration?-----  Yes  No
5. 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 conducted while batching at a rate that is representative of the normal batching rate and duration?-----  Yes  No

**PART II: TESTING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414, F.A.C. – (continued)**

(check  appropriate box(es))

**Compliance Demonstration - (Rule 62-296.401(5)(i), F.A.C.)**

1. Is each dust collector exhaust point tested according to the visible emissions limiting standard as part of the annual compliance demonstration? (Rule 62-297.310(7)(a), F.A.C.)-----  Yes  No

**New Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)**

2. Did this facility demonstrate:
- a) initial compliance no later than 30 days after beginning operation?-----  Yes  No
- b) annual compliance within 60 days prior to each anniversary of the air general permit notification form submittal date?-----  Yes  No

**Existing Facilities – (permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits)**

3. In order to demonstrate annual compliance, was an annual visible emissions test conducted 60 days prior to the AGP Notification form submission, and within 60 days prior to each anniversary date?-----  Yes  No

**Test Reports – (Rules 62-213.440, F.A.C. and 62-297.310(8)(b), F.A.C.)**

4. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed?-----  Yes  No

**PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-210.300(4)(c)2., F.A.C.**

(check  appropriate box(es))

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. If this is a stationary concrete batching plant, is there one or more relocatable nonmetallic mineral processing plants using individual air general permits at the same location? (*If your answer to this question is YES, then proceed to questions 2.a), thru 2.d,) below.*)-----  Yes  No
- a) Are there any additional nonexempt units located at this facility?-----  Yes  No
- b) Is the total combined annual facility-wide fuel oil usage of all plants less than 240,000 gallons per calendar year?-----  Yes  No
- c) Is the quantity of material processed less than ten million tons per calendar year?-----  Yes  No
- d) Is the fuel oil sulfur content 0.5% by weight or less?-----  Yes  No
3. Does the owner/operator of the concrete batching plant maintain a log book or books to account for:
- a) fuel consumption on a monthly basis?-----  Yes  No
- b) material processed on a monthly basis?-----  Yes  No
- c) the sulfur content of the fuel being burned (Fuel supplier certifications)?-----  Yes  No

**PART III: OPERATING/RECORDKEEPING REQUIREMENTS – Rule 62-296.414(2)(a) and (b), F.A.C. (continued)**

(check  appropriate box(es))

**Unconfined Emissions** – (Rule 62-296.320(4)(c), F.A.C.)

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

**PART IV: SPECIAL CONDITIONS AND PROCEDURES – Rule 62-210.300(4)(d)4., F.A.C.**

**A. New or Modified Process Equipment**

1. Since the last inspection 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 substantially different than that noted on the most recent notification form?-----  Yes  No
  - d) If you answered **YES** to any of the above, did the owner submit a new and complete notification form and appropriate fee (Rule 62-4.050, FAC) to the appropriate DEP or local program office?-----  Yes  No

Shannon Ransom

\_\_\_\_\_  
Inspector's Name (Please Print)

\_\_\_\_\_  
Date of Inspection

\_\_\_\_\_  
Inspector's Signature

\_\_\_\_\_  
Approximate Date of Next Inspection

**COMMENTS:**



## CONCRETE BATCHING PLANT

<b>FACILITY:</b> CEMEX, Inc. Largo Readymix Plant		<b>Per_ID:</b> 61	<b>DISTRICT:</b> Southwest
<b>ADDRESS:</b> 2063 20th Avenue S.E. Largo, FL		<b>CONTACT:</b> Phone No: 813-933-6711	
<b>ARMS No.:</b> 1030036 002	<b>PERMIT NO.:</b> 1030036-004-AG	<b>EXPIRATION DATE:</b> 06/23/08	
<b>EMISSION UNIT DESCRIPTION:</b> Cement Silo No. 1 controlled by a C&W Manufacturing and Sales Co. Model CP-305 Baghouse			
<b>INSPECTION DATE:</b> 3/23/06	<b>ARMS INSPECTION TYPE:</b> <input checked="" type="checkbox"/> INS2 or <input type="checkbox"/> INS_____	<b>COMPLIANCE STATUS:</b> <input checked="" type="checkbox"/> IN <input type="checkbox"/> MNC <input type="checkbox"/> SNC	
Type of Inspection: <input checked="" type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input type="checkbox"/> Complaint <input type="checkbox"/> Drive-by <input type="checkbox"/> Quarterly			
<b>A. General Review:</b>			
1.	Permit File Review	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2.	Introduction and Entry	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<i>Comments:</i> I spoke with Bob Ritter, plant manager, and explained the reason for my visit.		
3.	<b>Is the Authorized Representative still: Denise Corrales?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<i>Comments:</i> Denise Corrales is the Authorized Rep.		
4.	<b>Is the facility contact still: Denise Corrales?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
	<i>Comments:</i> Denise Corrales is a facility contact but she is not usually on the premises. Bob Ritter is the plant manager.		

I N	M N C	S N C	
<b>B. Specific Conditions</b>			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator of any relocatable concrete batching plant proposing to change location shall submit a Facility Relocation Notification Form (DEP Form No.62-21 0.900(6)) to the Department at least 30 days prior to relocation; [62-210.300(4)(c)2.c. , F.A.C.]</p> <p><i>Comments:</i> This facility <input type="checkbox"/> is or : is not a relocatable concrete batch plant.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The owner or operator of a stationary concrete batching plant using an air general permit may operate, or allow the operation of, one or more relocatable nonmetallic mineral processing plants using individual air general permits at the same location as the concrete batching plant provided the resultant facility contains no additional nonexempt units, the total combined annual facility-wide fuel oil usage of all plants is less than 240,000 gallons per calendar year, the material processed is less than 10 million tons per calendar year, and the fuel oil sulfur content does not exceed 0.5%, by weight. The owner or operator of the concrete batching plant shall maintain a log book to account for fuel consumption and material processed on a monthly basis. Fuel supplier certifications shall be maintained to account for the sulfur content of the fuel being bummed. [62-210.300(4)(c)2.e., F.A.C.]</p> <p><i>Comments:</i> The facility <input type="checkbox"/> does: does not operate a nonmetallic mineral processing plant on-site under general permit No. _____N/A_____. Reviewed the records for the months of ___N/A_____, ___N/A_____, and ___N/A_____. The maximum 12 month totals of ___N/A_____gallons/year of fuel and ___N/A_____ tons/year of material processed.</p>

I N C	M N C	S N C	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p align="center"><b>B. Specific Conditions</b></p> <p>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. [62-296.414(1), F.A.C.]</p> <p><i>Comments: The last annual visible emissions test, conducted on <u>May 11, 2005</u> demonstrated an opacity of <u>0</u> %</i></p> <p><i>An AQD VE test was performed during this site visit <input type="checkbox"/> Yes or : No. An opacity of <u>N/A</u> % was observed.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>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 Rule 62-296.320(4)(c), F.A.C. For concrete batching plants the following shall constitute reasonable precautions:</p> <p>(a) Management of roads, parking areas, stock piles, and yards, which shall include one or more of the following:</p> <ol style="list-style-type: none"> <li>1. Paving and maintenance of roads, parking areas, and yards.</li> <li>2. Application of water or environmentally safe dust- suppressant chemicals when necessary to control emissions.</li> <li>3. Removal of particulate matter from roads and other paved areas under control of the owner or operator to mitigate re-entrainment, and from building or work areas to reduce airborne particulate matter.</li> <li>4. Reduction of stock pile height or installation of wind breaks to mitigate wind entrainment of particulate matter from stock piles.</li> </ol> <p>(b) Use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck. [62-296.414(2)]</p> <p><i>Comments: The yard appeared well-kept today. There was a little bit of dust produced from vehicular traffic in the yard. The sweeper log indicated the last sweep was done on 3/21/06. Mr. Ritter stated the sweeper was due to come back tomorrow, Friday. He also stated Angelo's usually comes into the yard with their water truck and waters down the area closest to the entry/exit. He said he would have a driver use their bucket loader to water down the yard to prevent dust emissions as needed. There did not appear to be any track-out from the facility on to 20<sup>th</sup> Ave. SE today.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>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. [62-296.414(3)(c), F.A.C.]</p> <p><i>Comments: The last test, on <u>May 11, 2005</u>, was conducted at a process rate of <u>unknown</u>. Based on that test, the facility process rate was limited to <u>unknown</u>. The process rate was not noted on the visible emissions test performed and submitted by the consultant. Several attempts to track down the process rate through contact with the consulting firm were unsuccessful. Mary from Creative Environmental Solutions stated she has contacted Cemex several times for the process rate and nobody can seem to track down the information. She has contacted the Cemex main office where the silo loading receipts are filed and nobody at the office has cooperated with her. Louis Fernandez of Cemex accepted responsibility for tracking down the information. He faxed the loading information to me (see attachment). The process rate could not be determined, but the load was 27.41 tons.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>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. [62-296.414(3)(d), F.A.C.]</p> <p><i>Comments: Emissions from the weigh hopper <input type="checkbox"/> are <input checked="" type="checkbox"/> are not controlled by a separate dust collector.</i></p> <p><i>A separate test <input type="checkbox"/> was : was not conducted at the appropriate rate.</i></p>

I N C	M N C	S N C	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p align="center"><b>B. Specific Conditions</b></p> <p>Each dust collector exhaust point shall be tested annually. New facilities permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits, shall demonstrate initial compliance no later than 30 days after beginning operation, and annual compliance within 60 days prior to each anniversary of the air general permit notification form submittal date. Existing facilities permitted pursuant to Rule 62-210.300(4), F.A.C., Air General Permits, shall demonstrate compliance within 60 days prior to submitting an air general permit notification form and within 60 days prior to each anniversary of the air general permit notification form submittal date. [62-296.414(4), F.A.C.]</p> <p><i>Comments: The test should be completed between <u>March 24, 2005</u> and <u>May 24, 2005</u>. The last test was conducted on <u>May 11, 2005</u>, and the test results were submitted on <u>August 1, 2005</u>.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Test Reports. - The required test report shall be filed with the PCDEM as soon as practical but no later than 45 days after the test is completed. [Rules 62-213.440 and 62-297.310(8)(b), F.A.C.]</p> <p><i>Comments: The last test was conducted on <u>May 11, 2005</u>, and the test results were submitted on <u>August 1, 2005</u>. The results were submitted after the required submittal date and after the division "grace period" for unknown reasons. Per Wayne Martin it was recommended we exercise enforcement discretion given the factors involved (length of time between the review date and date violation of late submittal was noted upon re-review of the submitted VE test at the time of this inspection).</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The pollution control equipment shall be operated and maintained in accordance to the operation and maintenance (O&amp;M) plan. The O&amp;M plan shall include, but is not limited to:</p> <ol style="list-style-type: none"> <li>(1) Operating parameters of the pollution control device;</li> <li>(2) Time table for the routine maintenance of the pollution control device as specified by the manufacturer;</li> <li>(3) Time table for routine periodic observations of the pollution control device sufficient to ensure proper operation;</li> <li>(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;</li> <li>(5) A record log which will indicate, at a minimum: <ol style="list-style-type: none"> <li>a. When maintenance and observations were performed;</li> <li>b. What maintenance and observations were performed; and</li> <li>c. Who performed said maintenance and observations;</li> <li>d. Acceptable parameter ranges for each operational check.</li> </ol> </li> </ol> <p>[Pinellas County Code, Subsection 58-128]</p> <p><i>Comments: Reviewed records for the months of <u>September 2, 2004</u> through <u>March 22, 2006</u>. All records appeared to be complete and up to date.</i></p>
<b>C. General Procedure Requirements and Conditions</b>			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Administrative Corrections. Within 30 days of any changes requiring corrections to information contained in the notification form, the owner or operator shall notify the Department in writing. Such changes shall include:</p> <ol style="list-style-type: none"> <li>a. Any change in the name of the authorized representative or facility address or phone number; or</li> <li>b. Any other similar minor administrative change at the facility or emissions unit.</li> </ol> <p>[62-210.300(4)(d)3., F.A.C.]</p> <p><i>Comments: There have been no administrative changes.</i></p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Equipment Changes. In case of the installation of new process equipment, alteration of existing process equipment without replacement, or the replacement of existing process equipment with equipment substantially different than that noted on the most recent notification form, the owner or operator shall submit a new and complete general permit notification form with the appropriate fee pursuant to Rule 62-4.050, F.A.C., to the Department.</p> <p>[62-210.300(4)(d)4., F.A.C.]</p> <p><i>Comments: There have been no changes to the equipment.</i></p>

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>A permittee's use of a general permit is limited to five years. No later than 30 days prior to the fifth anniversary of the filing of intent to use the general permit, the owner or operator shall submit a new notice of intent which shall contain all current information regarding the facility or emissions unit. Eligibility to use the general permit is not transferable and does not follow a change in ownership of the facility or emissions unit. 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 owner shall remain liable for corrective actions that may be required as a result of any violations occurring in the time after the sale or legal transfer of the facility or emissions unit, but before a new owner is entitled to use an air general permit.</p> <p>[General Conditions - 62-210.300(4)(e)1., F.A.C.]</p> <p><i>Comments: The permit expires on 06/23/08. A new notification form is required to be submitted no later than 04/24/08.</i></p>
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**D. Other:**

Closing Conference	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p><i>Comments:</i> I informed Mr. Bob Ritter that the facility appeared to be in compliance at this time. I further informed him that I would continue monitoring 20<sup>th</sup> Ave. SE for fugitive emissions so he needs to ensure they are properly maintaining their yard and truck to prevent contributing to the 20<sup>th</sup> Ave. SE dust problem. He stated he would "stay on top of it".</p>	

<p>Other Comments:</p> <p>3/28/06 – Contacted Denise Corrales to get consultant's contact information – left a message. Denise had consultant from Creative Environmental Services (CES) contact me to tell me they were tracking down the process rate for the VE tests performed last May 11, 2005.</p> <p>3/31/06 – I called Mary at CES and inquired about their progress in obtaining the process rate. She said she is still trying to reach the manager of Cemex. She said she will call him right away and get back with me as soon as possible.</p> <p>5/15/06 – Louis Fernandez of Cemex faxed the load information for the VE tests performed on 5/11/05 to me.</p>
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<b>Inspector(s):</b> Shannon Ransom, Pinellas County, Air Quality Division
<b>Signature(s)</b> _____ <b>Date:</b> _____


**CONTACT LOG?** \_\_\_\_\_, **ACCESS?** \_\_\_\_\_, **ARMs?** \_\_\_\_\_