



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 1030045 001 **DATE:** 8/16/07 **ARRIVE:** 1:00 PM **DEPART:** 3:00 PM

FACILITY NAME: CEMEX Construction Materials, L.P.

FACILITY LOCATION: 2195 Lake Ave. S.E.

Largo, FL

RESPONSIBLE OFFICIAL: Denise Corrales?

PHONE: 813-269-1035

CONTACT NAME: Denise Corrales?

PHONE: 813-269-1035

REMITTANCE YEAR: N/A _____ **ENTITLEMENT PERIOD:** 12/5/2005 / 6/24/10
(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

Mike Ojo Thomas

Inspector's Name (Please Print)

8/28/07

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: See the attached Pinellas County inspection report form for additional information

CONCRETE BATCHING PLANT

FACILITY: CEMEX Construction Materials, L.P. Largo 2 Facility		Per_ID: 48	DISTRICT: Southwest
ADDRESS: 2195 Lake Ave. S.E. Largo, FL		CONTACT: Phone No: 813-269-1035	
ARMS No.: 1030045 001	PERMIT NO.: 1030045-005-AG	EXPIRATION DATE: 6/24/10	
EMISSION UNIT DESCRIPTION: Concrete Pipe Plant, Bin 1 (Cement), Controlled by a McNeilus, Model SFV 270 Dust Collector			
INSPECTION DATE: 8/16/07	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or <input type="checkbox"/> INS_____	COMPLIANCE STATUS: <input type="checkbox"/> IN <input checked="" 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			
A. General Review:			
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: This inspection was performed in order to determine if this facility has been operating within applicable regulations. Mr. Mike Patterson, Manager of Pipe Plant, Mr. Sheridan Dolan, Manager of Block plant and Ernie Riddlebarger, Manager of Ready Mix Plant, were present during the facility inspection of the emission units.</i>			
3.	Is the Authorized Representative still: Denise Corrales?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Comments: Denise Corrales is still the Authorized Representative</i>			
4.	Is the facility contact still: Denise Corrales?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>Comments: Denise Corrales is still the facility contact.</i>			

I N	M N C	S N C	
B. Specific Conditions			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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.] <i>Comments: This facility is not a relocatable concrete batch plant.</i>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	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.] <i>Comments: The facility <input type="checkbox"/> does <input type="checkbox"/> does not operate operated 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.</i> Pressure relief pop-up valve(s) – is there a accumulation of cement around the pop-off valves? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Silo housings & duct work – are there any apparent leaks? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

I N C	M N C	S N C	B. Specific Conditions
<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"> 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 re-entrainment, 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. <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>Comments: The yard area was moist; there were no unconfined emissions, from site activity at the time of inspection.</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>Comments: The last test, on 6/4/07, was conducted at a process rate of _25tph_. Based on that test, the facility process rate was limited to 25 tph.</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>Comments: Emissions from the weigh hopper <input type="checkbox"/>are <input checked="" type="checkbox"/>are not controlled by a separate dust collector. A separate test was not conducted at the appropriate rate.</p>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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>Comments: The test should be completed between 4/26/07 and 6/26/07. The last test was conducted on 6/4/07, and the test results were submitted on 6/26/07</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>Comments: The last test was conducted on 6/4/07, and the test results were submitted on 6/26/07.</p>

I N C	M N C	S N C	
			B. Specific Conditions
<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&M) plan. The O&M plan shall include, but is not limited to:</p> <ol style="list-style-type: none"> (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: <ol style="list-style-type: none"> 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. <p>[Pinellas County Code, Subsection 58-128]</p> <p><i>Comments: Reviewed records for the months of _____. Note: O&M record was not review at the inspection due to lack of time.</i></p>
			C. General Procedure Requirements and Conditions
<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"> a. Any change in the name of the authorized representative or facility address or phone number; or b. Any other similar minor administrative change at the facility or emissions unit. <p>[62-210.300(4)(d)3., F.A.C.]</p> <p><i>Comments: This is non applicable at this time.</i></p>
<input type="checkbox"/>	<input checked="" 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: Inspection of the CEMEX Incorporated emission unit's onsite shows as follows:</i> Emission units onsite shows seven dust collectors and one Truck load out with a Griffins Central Dust Collector. Ready Mix Plant: Three silos, each has one C & W CP 305 bag house and one Truck load out with a Griffins V8 Central Dust Collector. Block Plant: One silo has one C & W CP 305 bag house and One CP-100 bag house hooked up a mixer inside the block plant building. Pipe Plant: Two silos, each has one SFV 270.</p> <p>The new emission units equipment changes is as follows: Ready Mix Plant: Three silos, each has one C & W CP 305 bag house and one Truck load out with a Griffins V8 Central Dust Collector. Previously a Central Dust Collector. Block Plant: One silo has one C & W CP 305 bag house. Previously split cement silo each has one SFV 270 bag house. CEMEX Incorporated failed to submit Air General Permit Registration Form to Department of Environmental Protection or Pinellas County Air Quality Division. See attached CEMEX letter dated 8/22/07 and the photographs of Emission Units description of what is onsite/Emissions Units configuration.</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. [General Conditions - 62-210.300(4)(e)1., F.A.C.]</p> <p><i>Comments: The permit expires on 6/24/10. A new notification form is required to be submitted no later than 5/25/10.</i></p>
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D. Other:

<p>Pollution Prevention Activities Pollution Prevention Activities</p>
<p>➤ P2 Handouts Provided: <input checked="" type="checkbox"/> P2 Brochure; <input type="checkbox"/> P2 Manual; <input type="checkbox"/> P2 Checklist</p> <p>➤ Have any emissions reductions occurred <input type="checkbox"/> Yes / <input type="checkbox"/> No _____</p> <p style="margin-left: 20px;"> <input type="checkbox"/> Chemical Substitution; <input type="checkbox"/> Equipment Changes; <input type="checkbox"/> Process Changes <input type="checkbox"/> Chemical/Material Reuse; <input type="checkbox"/> On-site Recycling; <input type="checkbox"/> Other: _____ </p> <p><i>Comments:</i></p>

Closing Conference	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>Comments:</i>	

Other Comments: **CEMEX Incorporated is deemed to be in non-compliance regarding procedures at this time.**

Inspector(s): Mike Ojo Thomas, Pinellas County, Air Quality Division

Signature(s)	Date: 8/28/07
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CONTACT LOG? _8/28/07_, **ACCESS?** _8/28/07_, **ARMs?** _8/28/07_
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