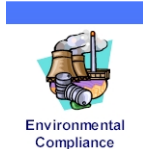




CONCRETE BATCHING PLANT
COMPLIANCE INSPECTION CHECKLIST



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

| | | |
|--|---|---|
| FACILITY: Preferred Materials, Inc. | | DISTRICT: |
| DBA/Site Name: | | Southwest |
| ADDRESS: 3757 118th Avenue North Pinellas Park, FL | | CONTACT PHONE: 727-571-3342 |
| ARMS NO: 1030139 005 | PERMIT NO: 1030139-005-AG | Expiration Date: 12/14/12 Renewal Date: 11/14/12 Test Date: 1/9/00 |

EMISSION UNIT DESCRIPTION: Truck Concrete Batch Load-out, C&W Manufacturing & Sales Company, Model CP-910-1278 Dust Collector

| | |
|-------------------------------------|--|
| INSPECTION DATE: 10/15/08 | INSPECTION COMPLIANCE STATUS (check <input type="checkbox"/> only one box) <input type="checkbox"/> In Compliance; <input type="checkbox"/> Minor Non-Compliance; <input checked="" type="checkbox"/> Significant Non-Compliance |
|-------------------------------------|--|

PART I: General Review:

| | | |
|----|---|---|
| 1. | Permit File Review | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. | Introduction and Entry <i>Comments: Was given a walking tour of the facility. An obvious effort is being made to keep the fugitive dust from the driving areas to a minimum as all areas of the yard were clean and wet.</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. | Is the Authorized Representative still <u>David Guillaume</u>? <i>Comments: The new authorized rep. is Phil Novemestky.</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 4. | Is the facility contact still <u>Jason Chambers</u>? <i>Comments: The facility contact is Peter Skiadas</i> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 5. | If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [62-210.310(2)(d), F.A.C.] See comment #1. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

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. ☐ **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 ☐ 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 tested 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 resulted in an opacity of 0 % 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

See comment #2.

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

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)

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? [62-296.414(3), F.A.C.] ----- ☐ Yes ☐ No

See comment #3

8. 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 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

See comment #4

10. Was a visible emissions test(s) conducted by the inspector during this site visit according? ----- ☐ Yes ☒ No

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 concreted 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 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 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 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 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 the any of the answers to 1a) – 1d) is **Yes** to any, 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 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
- See comment #5.**
- 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 01/07 to 08/05/08

See comment # 6

Comments:

1) I spoke with the new authorized representative, Phil Novemestky, on 10/16/08 and informed him of this requirement.

2) There is no documentation in the permit file indicating a notification 15 days prior to testing.

3) Not applicable.

4) Question cannot be answered from the data supplied.

5) The facility did not notify the department of the failure of the dust collector associated with the truck load out batcher.

6) The records for this facilities O&M plan were supplied to me on the date of this inspection. When the new facility contact, Peter Skiadas, came on the job in early August he was not informed of the O&M plans documentation requirements. Therefore, the records for all E.U.s associated with this site are incomplete from 08/05/08 to this date (10/15/08).

This dust control device appeared to be inoperable as there was a considerable amount of fugitive dust evident at the truck loading point. There was also a sufficient dust build up on the surrounding structures indicating that this dust collector has been inoperable for some time. During my inspection I witnessed the loading of three trucks. The dust cloud was evident during all three loadings. The truck loading that is photographed (see attached photo) had a mixed load of fly ash, aggregate, slag and cement for a total load of 10 cubic yards. The dust cloud associated with this batch lasted for approximately four minutes.

Phil Novemestky when notified on 10/16/08 of the condition of this e.u. indicated that he would look into the repairs of the unit immediately.

Chris R. Brodeur

Inspector's Name

10/15/08

Date of Inspection

Inspector's Signature

10/09

Approximate Date of Next Inspection

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