



CONCRETE BATCHING PLANT

COMPLIANCE INSPECTION CHECKLIST



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

FACILITY: Preferred Materials, Inc. DBA/Site Name: DISTRICT: Southwest
ADDRESS: 3757 118th Avenue North Clearwater, FL CONTACT PHONE: 3522790404
ARMS NO: 1030139 003 PERMIT NO: 1030139-006-AG Expiration Date: 1/19/2014
Renewal Date: 12/20/2013 Test Date: 2/2/2000

EMISSION UNIT DESCRIPTION: Fly Ash Silo, Controlled by a C&W Baghouse, Model CP-230-639 Dust Collector w / 6 cartridges

INSPECTION DATE: 11/2/10 INSPECTION COMPLIANCE STATUS (check [ ] only one box)
[ ] In Compliance; [ ] Minor Non-Compliance; [X] Significant Non-Compliance

PART I: General Review:

- 1. Permit File Review [X] Yes [ ] No
2. Introduction and Entry [X] Yes [ ] No
Comments: I met with Mark Throckmorton, onsite manager, who provided me with the requested documents and gave me a tour of the facility.
3. Is the Authorized Representative still Rob Duke? [X] Yes [ ] No
Comments: This has not changed.
4. Is the facility contact still Hank Belcher? [ ] Yes [X] No
Comments: The facility contact changed on October 26, 2010 to Calvin Calhoun.
5. If the answer to 3 or 4 is "No", did the facility provide an administrative update within 30 days? [ ] Yes [X] No
[62-210.310(2)(d), F.A.C.] They are still within the 30 day period. I informed Mark that we will need written notification of the change.

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 [X] No
2. [X] Existing Facilities - (permitted pursuant to Rule 62-296.414(4)(a), F.A.C., Air General Permits)
In order to demonstrate annual compliance, was an annual visible emissions test conducted on each dust collector exhaust point within 365 days (annually thereafter) of the previous visible emissions compliance test? [ ] Yes [X] No
Test Reports
3. Do the submitted visible emission tests demonstrate compliance with the 5 percent opacity limit? [X] 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.] [X] Yes [ ] No
5. Was the required test report filed with the department as soon as practical, but no later than 45 days after the test was completed? [62-297.310(8)(b)] [X] Yes [ ] No
6. Was the facility visible emissions test(s) conducted according to EPA Method 9? [62-297.401(9)(c), F.A.C] [X] Yes [ ] No
7. During visible emissions tests of the silo dust collector exhaust points was the loading of the silo conducted at a rate that is representative of the normal silo loading rate, or at least at the minimum 25 tons per hour rate,

**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)

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

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

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

1. Is this facility: 1) a  stationary; 2) a  relocatable; or does it have: 3) both,  stationary and relocatable concrete batching and/or nonmetallic mineral processing plants? (Please check  only one box.)
2. For any combination of stationary or relocatable concrete batching plants, located with other concrete batching plants or nonmetallic mineral processing plants:
- a) Are there any additional nonexempt units located at this facility? [62-210.310(5)(b)4.a., F.A.C.] -----  Yes  No
- b) Is the total combined annual facility-wide fuel usage of all plants less than or equal to the fuel usages listed below: [62-210.310(5)(b)4.b., F.A.C.]-----  Yes  No
- 1) 275,000 gallons of diesel fuel – usage equals \_\_\_\_\_ gallons
- 2) 23,000 gallons of gasoline – usage equals \_\_\_\_\_ gallons
- 3) 44 million standard cubic feet on natural gas – usage equals \_\_\_\_\_ cubic feet
- 4) 1.3 million gallons of propane – usage equals \_\_\_\_\_ gallons
- 5) or an equivalent prorated amount if multiple fuels are used onsite – usage equals \_\_\_\_\_ % of all fuels
3. Does the owner/operator of the concrete batching plant submitting this registration maintain records to account for site-wide fuel consumption for each calendar month and each consecutive twelve (12) months, and are these records available for Department inspection for a period of at least five (5) years? [62-210.310(5)(b)4.d., F.A.C.] -----  Yes  No
- Relocation Notification** - (Rule 61-210.310(5)(b)3.b., F.A.C.)
1. Is the relocatable concrete batching plant used to mix cement and soil for onsite soil augmentation or stabilization?—(if your answer is YES, please proceed to 1. a) thru 1.b) below) -----  Yes  No
- a) Did the owner or operator notify the Department by telephone, e-mail, fax, or written communication at least one (1) business day prior to changing location?-----  Yes  No
- b) Did the owner or operator transmit a Facility Relocation Notification Form (DEP No. 62-210.900(6)) to the Department no later than five (5) business days following a relocation? -----  Yes  No
- If your answer to number 1. above is NO, proceed to 2. below**
2. Did the owner or operator transmit a Facility Relocation Notification Form (DEP No. 62-210.900(6)) at least five (5) business days prior to relocation? -----  Yes  No

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

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

1. Does the owner /operator of the concrete batching plant take reasonable precautions to control unconfined emissions -----  Yes  No
- Which of the following methods are used:
- a) management of roads, parking areas, stock piles, and yards, which shall include one or more of the following:
- 1) Paving and maintenance of roads, parking areas, stock piles, and yards? -----  Yes  No
- 2) application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions? -----  Yes  No
- 3) removal of particulate matter from roads and other paved areas under control of the owner/operator to re-entrainment, and from building or work areas to reduce airborne particulate matter? -----  Yes  No

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

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- 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 changes in the name, address, or phone number of the facility or authorized representative not associated with a change in ownership or with a physical relocation of the facility or any emissions units or operations comprising the facility; or any other similar minor administrative change at the facility -----  Yes  No
- 2. If yes, did the facility provide written notification within 30 days of the change? [62-210.310(2)(d), F.A.C.] -----  Yes  No

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

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

**New or Modified Process Equipment or Change in Ownership**

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

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

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

**PART VI: Comments**

**O&M Plan**

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

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

[Pinellas County Code, Subsection 58-128]

Reviewed records for the months of November 12, 2009 – November 2, 2010

**Comments:**

The records for the O&M plan were complete up through December 2009 on the PC approved O&M Plan recordkeeping forms. There were no records for January 2010 – June 6, 2010. Starting June 7, 2010 – present, there were weekly plant inspection & maintenance records available on a form not approved by PC (see hardcopy attached). It does not appear to contain all of the required checkpoints included on the previously approved plan/form and does not specify emission units.

The current plant manager, Mark Throckmorton, explained that he was hired in May and before then there were two other managers. He stated he was never shown the approved recordkeeping checklists and he was told that they recently combined forms when they showed him what to fill out for his inspection and maintenance checks when he trained in May. He immediately contacted his regional supervisors to find out where the form could be found and to tell them I was there performing an inspection. They were working on trying to login to the computer under the previous managers' names to find the form during my visit and continued after my departure. Once they find it, they will email it to me so we know at which point the form stopped being used.

On 11/9/10, I received the found records for the emission units. The form was complete from Jan 2010 – April 14, 2010. Therefore, they have no records for the period between April 15, 2010 to June 6, 2010 and the records from Jun 7, 2010 – November 2, 2010 are not completed according to the facility's O & M Plan and approved forms (i.e. the forms are not the same).

Exit Interview: I informed Mark Throckmorton that it appears the facility may be in non-compliance due to improper recordkeeping for inspections and maintenance of each emission unit I informed him that once we receive the records he and his supervisors are searching for, we will review them and inform the facility contacts of the next step i.e. enforcement actions or penalties.

Shannon Ransom

**Inspector's Name**

11/2/10

**Date of Inspection**

**Inspector's Signature**

~ 11/2011

**Approximate Date of Next Inspection**

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