



CONCRETE BATCHING PLANT



COMPLIANCE INSPECTION CHECKLIST

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

AIRS ID#: 7775198 001 **DATE:** 5/30/06 **ARRIVE:** 12:30 PM **DEPART:** 3:00 PM

FACILITY NAME: Laurelwood Florida Builders, Inc.

FACILITY LOCATION: 8989 Ulmerton Road

Largo, FL

RESPONSIBLE OFFICIAL: Kerry K. Dowling?

PHONE: 727-559-0116

CONTACT NAME: Kerry K. Dowling?

PHONE: 727-559-0116

REMITTANCE YEAR: N/A **ENTITLEMENT PERIOD:** 3/30/03 / 03/30/08
(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

Mike Ojo Thomas

5/30/06

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

COMMENTS: #1 - This source was inspected determine if it is operating within applicable regulations and general permit conditions. Mr. Kerry Dowling, Owner, was present during the facility tour and records inspection.

COMMENTS: # 2- The annual visible emission test was not submitted according to the (Rule 62-297.310(7) (a), F.A.C. I inquired as why annual compliance test was not submitted to the AQ Division office. Mr. Kerry Dowling stated he was not sure if his consultant had forgotten to perform their VE test. He told me he would contact his consultant company regarding the annual test. Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping General Permit (s) require that emissions testing be performed within 60 days prior to 2/28/2006. Mr. Dowling was advised to submit the Annual Compliance test within a week. Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping failed to produce the Annual Compliance test.

COMMENTS: # 3 - The operation and maintenance log was reviewed from 5/30/04 through 5/30/06. The six-month basis checks were not record nor performed as required by O&M plan. The weekly inspections checks log did not show the years inspection checks was performed in numerous occasions. See an attached sheet. I asked Mr. Dowling as to why the maintenance checks were not recorded. He stated they performed maintenance of the baghouse. Mr. Dowling stated his worker failed to document and record maintenance checks in according to their O&M plan. I told Mr. Dowling, these are normally inspected on a regular basis and records of maintenance are required on permitted emissions. The O&M failed to meet the requirements of the Pinellas County Code Sec. 58-128. I explained what they needed to fill out on the O&M log. I told Mr. Dowling that Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping appears to be in noncompliance. I explained to Mr. Dowling that the O&M records not been up to date as required by O&M plan. I told him he would need to keep records according to the O&M plan. I made him aware that AQ Division office consider this to be evidence that their demonstrates preventive maintenance is being performed on their emission unit.

COMMENTS: # 4 - During the closing conference, I remind Mr. Dowling the Air General Permit (s) require that emissions testing be performed within days prior to 2/28/2006. I told him there is a high probability a notice of violation letter will be issued. I told him the notice of violation letter will request a writing response detailing what caused the violation, what actions have been taken to remedy the problem and actions taken to prevent future occurrences.

CONCRETE BATCHING PLANT

FACILITY: Laurelwood Florida Builders, Inc. C & D Thin Pavers and Coping		Per_ID: 2505	DISTRICT: Southwest
ADDRESS: 8989 Ulmerton Road Largo, FL		CONTACT: Kerry K. Dowling Phone No: 727-559-0116	
ARMS No.: 7775198 001	PERMIT NO.: 7775198-001-AG	EXPIRATION DATE: 03/30/08	
EMISSION UNIT DESCRIPTION: Silo No. 1: Inside the Building, Belgrade 200 Barrel low profile portable cement silos (8'6" wide X 13'6" tall X 26' long) Emissions controlled by Belgrade baghouse with 150 square foot of filtration. (18 PE 37 100% polyester 902 fabric filters)			
INSPECTION DATE: 5/30/2006	ARMS INSPECTION TYPE: <input checked="" type="checkbox"/> INS2 or <input type="checkbox"/> INS_____	COMPLIANCE STATUS: <input type="checkbox"/> IN <input type="checkbox"/> MNC <input checked="" type="checkbox"/> SNC	
Type of Inspection: <input type="checkbox"/> Initial <input type="checkbox"/> Re-inspection <input checked="" 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	
Comments: The Source was inspected to determine if it is operating within applicable regulations and general permit conditions. Mr. Kerry Dowling, Owner, was present during the facility tour and records inspection.			
3.	Is the Authorized Representative still: <u>Kerry K. Dowling</u>?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Comments:			
4.	Is the facility contact still: Kerry K. Dowling?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Comments:			

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.] Comments: This facility has two re-locatable concrete batch plants onsite.
<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.] Comments: The facility 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 _____. The maximum 12 month totals of ___n/a___gallons/year of fuel and ___n/a___ tons/year of material processed.

I N C	M N C	S N C	B. Specific Conditions
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<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 2/23/05___ demonstrated an opacity of 0_%. An AQD VE test was performed during this site visit <input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No. An opacity of ___n/a___% was observed. The emission unit was not in operation (No pneumatic loading of silo at the time). No visible emission test was performed</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"> 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><i>Comments: The yard area was sodden. According to Mr. Dowling, the facility apply the water and suppressant to the inside yard 3-4 times a day and to the outside area at least 2 times a day.</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 2/23/05, was conducted at a process rate of 25 tph. Based on that test, the facility process rate was limited to 25 tph.</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>

I N C	M N C	S N C	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p align="center">B. Specific Conditions</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>12/28/05</u> and <u>2/28/06</u>. The last test was conducted on <u>2/23/05</u>, and the test results were submitted on 2/25/05. Note: The annual visible emission test was not submitted according to the (Rule 62-297.310(7) (a), F.A.C. I inquired as why annual compliance test was not submitted to the AQ Division office. Mr. Kerry Dowling stated he was not sure if his consultant had forgotten to perform their VE test. He told me he would contact his consultant company regarding the annual test. Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping General Permit (s) require that emissions testing be performed within 60 days prior to 2/28/2006.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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>2/23/05</u>, and the test results were submitted on 2/25/05. Note: The annual visible emission test was not submitted according to the (Rule 62-297.310(7) (a), F.A.C. I inquired as why annual compliance test was not submitted to the AQ Division office. Mr. Kerry Dowling stated he was not sure if his consultant had forgotten to perform their VE test. He told me he would contact his consultant company regarding the annual test. Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping General Permit (s) require that emissions testing be performed within 60 days prior to 2/28/2006.</i></p>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 5/30/04 through 5/30/06. The six-month basis checks were not record nor performed as required by O&M plan. The weekly inspections checks log did not show the years inspection checks was performed in numerous occasions. See an attached sheet.</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: Not applicable at this time.</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. [62-210.300(4)(d)4., F.A.C.]</p> <p>Comments: Not applicable at this time.</p>
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<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>Comments: The permit expires on 03/30/08. A new notification form is required to be submitted no later than 01/30/08.</p>
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D. Other:		
Closing Conference		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Comments: See comment # 3 below.		

<p>Other Comments: # 1 - The annual visible emission test was not submitted according to the (Rule 62-297.310(7) (a), F.A.C. I inquired as why annual compliance test was not submitted to the AQ Division office. Mr. Kerry Dowling stated he was not sure if his consultant had forgotten to perform their VE test. He told me he would contact his consultant company regarding the annual test. Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping General Permit (s) require that emissions testing be performed within 60 days prior to 2/28/2006. Mr. Dowling was advised to submit the Annual Compliance test within a week. Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping failed to produce the Annual Compliance test.</p> <p>COMMENTS: # 2 - The operation and maintenance log was reviewed from 5/30/04 through 5/30/06. The six-month basis checks were not record nor performed as required by O&M plan. The weekly inspections checks log did not show the years inspection checks was performed in numerous occasions. See an attached sheet. I asked Mr. Dowling as to why the maintenance checks were not recorded. He stated they performed maintenance of the baghouse. Mr. Dowling stated his worker failed to document and record maintenance checks in according to their O&M plan. I told Mr. Dowling, these are normally inspected on a regular basis and records of maintenance are required on permitted emissions. The O&M failed to meet the requirements of the Pinellas County Code Sec. 58-128. I explained what they needed to fill out on the O&M log. I told Mr. Dowling that Laurelwood Florida Builders, Inc. D/B/A C & D Thin Pavers and Coping appears to be in noncompliance. I explained to Mr. Dowling that the O&M records not been up to date as required by O&M plan. I told him he would need to keep records according to the O&M plan. I made him aware that AQ Division office consider this to be evidence that their demonstrates preventive maintenance is being performed on their emission unit.</p> <p>COMMENTS: # 3 - During the closing conference, I remind Mr. Dowling the Air General Permit (s) require that emissions testing be performed within days prior to 2/28/2006. I told him there is a high probability a notice of violation letter will be issued. I told him the notice of violation letter will request a writing response detailing what caused the violation, what actions have been taken to remedy the problem and actions taken to prevent future occurrences.</p>		
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Inspector(s): Mike Ojo Thomas, Pinellas County, Air Quality Division		
Signature(s)		Date: 6/1/2006