

5600078 - CAV

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Compliance Assurance Visit (CAV) Report

Date: 04/28/2020

Asheville Regional Office
McDowell Concrete Supply, LLC
NC Facility ID 5600078
County/FIPS: McDowell/111

Facility Data			Permit Data				
McDowell Concrete Supply, LLC 101 South Garden Street Marion, NC 28752 Lat: 35d 41.4840m Long: 82d 0.1320m SIC: 3273 / Ready-Mixed Concrete NAICS: 32732 / Ready-Mix Concrete Manufacturing			Permit n/a Issued n/a Expires n/a Class/Status Permit Exempt Permit Status Inactive Current Permit Application(s) None				
Contact Data			Program Applicability				
Facility Contact	Authorized Contact	Technical Contact	SIP				
Patrick Boone Manager/Owner (828) 652-5721	Patrick Boone Manager/Owner (828) 652-5721	Patrick Boone Manager/Owner (828) 652-5721					
Comments:			Compliance Data				
Inspector's Signature: <i>Bob Graves</i> Date of Signature: 4/28/2020			CAV Date 04/28/2020 Inspector's Name Bob Graves Operating Status Operating Compliance Code Compliance – procedural requirements Action Code PCE On-Site CAV Result Compliance				
Total Actual emissions in TONS/YEAR:							
	TSP	SO2	NOX	VOC	CO	PM10	* HAP
2013	0.3120	---	---	---	---	0.1490	0.0185
2008	0.3240	---	---	---	---	0.1490	0.0192
* Highest HAP Emitted (in pounds)							
Five Year Violation History: None							
<u>Date</u>	<u>Letter Type</u>	<u>Rule Violated</u>			<u>Violation Resolution Date</u>		
Performed Stack Tests since last FCE: None							
<u>Date</u>	<u>Test Results</u>	<u>Test Method(s)</u>			<u>Source(s) Tested</u>		

1.) Directions: From the ARO, follow I-40 East to Exit 81 (Sugarhill Road). Follow Sugarhill Road Northeast toward downtown Marion. Cross over Main Street in downtown Marion, and the facility is straight ahead besides the railroad tracks.

2.) Facility Overview:

- Safety:
Safety glasses, safety shoes and hard hat
- Discussion:
On April 28, 2020, at approximately 2:50PM, I, Bob Graves called the facility conduct a partial compliance evaluation (PCE) of McDowell Cement Supply, LLC. I called and spoke with Mr. Tommy Stevenson, Plant Dispatcher. Mr. Pat Boone, Manager/Owner and my normal facility contact was not available. The logbook records were not available during my telephone call. Note: I did not do an on-site visit.
- Facility Description:

This facility has two separate plants on the same property.

1. Old Plant: The "Old Plant" has various missing parts (Table 1) and has not operated in many years. The facility has no future plans to operate the Old Plant.
2. New Plant: The "new plant" (Table 2) is the only plant that operates (batching concrete).

3. Emission Source Review:

Table 1. "Old Plant" This plant has not been used to batch concrete in many years.

Emission Source ID	Emission Source Description	Control System ID	Control System Description
One truck mix concrete batch plant (maximum process rate of 120 cubic yards per hour) consisting of the following:			
1	one cement storage silo (56 tons of cement storage capacity)	1	one bagfilter (250 square feet of filter area) (shutdown)
2	one cement storage silo (100 tons of cement storage capacity)	2	one bagfilter (121 square feet of filter area) (shutdown)
FAS1	one flyash storage silo (50 tons of flyash storage capacity)	FAS1c	one bagfilter (200 square feet of filter area) (shutdown)
ES-4	one cement/flyash weigh hopper (2 tons of holding capacity)	CD4	one bagfilter (20 square feet of filter area) (shutdown)
ES-5	one concrete truck load-out operation (observe not in operation)	CD5	one spray bar (shutdown)

Emission Source ID	Emission Source Description	Control System ID	Control System Description
Table 2. "New Plant" emissions sources and control devices.			
One truck mix concrete batch plant (maximum process rate of 150 cubic yards per hour) consisting of the following:			
ES-6	one cement storage silo (150 tons of cement storage capacity)	CD6	one bagfilter (250 square feet of filter area)
ES-7	one flyash storage silo (75 tons of flyash storage capacity)	CD7	one bagfilter (250 square feet of filter area)
ES-8	one cement/flyash weigh hopper (13.5 tons of holding capacity)	N/A	N/A
ES-9	one concrete truck load-out operation	CD9	one spray bar (8 mist spray nozzles with 3 gallons per minute total flow rate).

New Plant: No observations, because I did not do an on-site visit.

4. Control of Visible Emissions: During my last on-site visit, I did not observe a VE violation. Compliance is expected.
5. Fugitive Dust: On April 27, 2020, Ms. Angela Hopper, DAQ staff, received a fugitive dust complaint. See complaint files.
6. Maintenance Records Review -Optional: Fabric Filter (bag filters) and Concrete Truck Load-out Control (water spray controls): These records were not available during the PCE.
 - Optional: Bag filters: Inspection and Maintenance (I&M) logs on the bag houses control equipment. During my last visit, the facility replaced all of the bag filters on CD-6 and CD-7 on July 25-26, 2019.
 - Optional: Water spray bars Inspection and Maintenance (I&M) on Concrete truck load-out operation (CD9): - During my last on-site visit I was told the facility inspects the water spray bars but does not always document the results in a logbook.
7. 2019 Production: 2019 annual production was 23,174 cubic yards.
8. Air Permit rescinded: The facility's Air Permit was rescinded on November 8, 2019.
9. Insignificant Sources Listing:

Source
I-1 - Sand and aggregate delivery to ground storage, transfer to conveyor, and transfer to elevated storage (120 cubic yard per hour plant)

I-2 - Sand and aggregate delivery to ground storage, transfer to conveyor, and transfer to elevated storage (150 cubic yard per hour plant)

I-1A - sand and aggregate weigh hopper
(120 cubic yard per hour plant)

I-2A - sand and aggregate weigh hopper
(150 cubic yard per hour plant)

10. 112 (r) review: not subject to 112 (r).

11. Compliance Assistance: I discussed the fugitive dust complaint and the need for the facility to control dust on the haul roads, gravel lot and stock piles.

12. Recommendation /Compliance Statement / Conclusion:

- Recommendation: The facility should continue apply water to haul roads to control their fugitive dust.
- Conclusion / Compliance Statement:
This facility appears to be in compliance with applicable air quality rules. This facility appears to be exempt from air permitting requirements per 2Q .0102 (d).