Asheville-Buncombe Air Quality Agency Facility Inspection Report

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<th>Facility Inspection Information</th>
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<tr>
<td><strong>Facility Name:</strong> Southern Concrete Materials – Biltmore</td>
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<td><strong>Date of Inspection:</strong> May 25, 2023</td>
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<td><strong>Mailing Address:</strong> P.O. Box 5395, Asheville, NC 28813</td>
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<td><strong>Contact Name:</strong> Keith Henson, Jeff Lamm</td>
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<td><strong>Permit #:</strong> 11-786-15A</td>
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<td><strong>Inspector(s):</strong> Alexander (Alex) Latta</td>
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<td><strong>Results:</strong> Appears in compliance</td>
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**Introduction**

On the above date, a comprehensive inspection was conducted at Southern Concrete Materials - Biltmore. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Code (AB Air Quality Code). South Concrete Materials, otherwise known as the facility, is a concrete batch plant. Operation of this facility is granted under permit number 11-786-15A which was issued on July 13, 2015, amended November 14, 2016, and expires on July 31, 2023. The inspection was conducted by Alex Latta. The facility was represented by Keith Henson and Jeff Lamm. The following is a summary of the inspection results:

**Safety Equipment / Special Instructions**

Steel-toed shoes, a hard hat, and safety vest, are required while touring the facility.

**Permitted Equipment**

- CBP: One (1) ready mix concrete batch plant with a maximum rated capacity of 125 cubic yards per hour, consisting of the following:
  - One (1) ready mix central concrete mixer (CM) with emissions controlled by a baghouse (CD-1) with 420 square feet of filter area
- One (1) 175-ton capacity cement silo (CS) with emissions controlled by a baghouse (CD-2) with 420 total square feet of filter area,
- One (1) 175-ton capacity fly ash silo (FS) with emissions controlled by a baghouse (CD-3) with 420 square feet of filter area,
- One (1) 60-ton capacity cement silo (CS2), including three bins, with emissions controlled by three baghouses (CD-4, CD-5, CD-6) each with 420 square feet of filter area
- One (1) 3.0-ton capacity weigh hopper (WH) with emissions controlled by a baghouse (CD-1) with 420 square feet of filter area,
- One (1) truck mix operation (TM) with emissions controlled by a baghouse (CD-1) with 420 square feet of filter area

Emission Unit CBP was observed operating during the inspection. Condition B.2 does not allow for operation of the Central Mix (CM) and Dry Batch (TM) operations to occur simultaneously. According to facility representatives, it is not possible to run both processes simultaneously and they can only be run one at a time.

**Exempt Sources:**

**The following exempt equipment was observed during the inspection:**

- One (1) Lochinvar natural gas fueled boiler with a maximum heat input capacity of 2.07 MMBtu/hr. No backup fuel is utilized for this boiler.
- One (1) 10,000-gallon diesel tank
- One non-functioning portable storage silo.

It should be noted the portable storage silo is currently disconnected but still resides on-site.

**Permit Conditions:**

**The following permit conditions were reviewed during this inspection:**
• A.1 – The facility is required to operate according to AB Air Quality Code including but not limited to the following specified conditions and any other applicable Local, State, and Federal regulations.

• A.2 – This condition is informational in nature and the facility is aware of the requirements relating to permit changes and permit applications. The facility is required to operate the equipment and processes as described in their permit application. They are also required to maintain a copy of the permit application.

• A.3 – The facility is required to submit an application for any changes or alterations to processes and equipment to AB Air Quality Agency. Failure to do so could result in enforcement action.

• A.4 – This condition requires the permittee to notify the Agency in the event of a name or ownership change.

• A.5 – The facility is required to obtain a new air permit prior to installing and operating sources of air emissions at a different location from the permit (relocation).

• A.6 – This permit does not absolve the facility of any liabilities related to any civil/criminal penalties for violations of AB Air Quality Code prior to permit issuance. The facility shall be subject to enforcement action if the terms of the permit are violated.

• A.7 – This condition requires that the permittee maintain and operate the facility at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved. The facility has developed a maintenance schedule for equipment and is maintaining records of all maintenance. Additionally, the facility is maintaining an inventory of spare parts for equipment. The facility has established standard operating procedures for equipment and is training equipment operators on the procedures. Condition B.6 further discusses the facility’s maintenance activities.

• A.8 – This condition requires that the facility notify the Agency in the event of a malfunction. The facility has not experienced any malfunctions during the reporting period.
• A.9 – This condition lists the Agency address that the facility is required to submit any required reports, data, notifications, and requests for renewal.

• A.10 – The facility shall allow authorized Local, State, and Federal representatives on-site for inspection upon presentation of credentials.

• A.11 – This condition requires that the facility pay their annual permit fee on a timely basis. The facility is up to date on fee payments. The facility last submitted their fee payment on August 8, 2022.

• A.12 – The facility is required to submit a permit renewal request no later than ninety (90) days prior to permit expiration. The facility’s request was received by the Agency on February 27, 2023.

• A.13 – This permit may be suspended or revoked by the AB Air Quality Agency Board under certain conditions.

• A.14 – This condition requires the facility retain a copy of the permit on the premises. The facility had a copy of their current operating permit on-site.

• B.1 – The previous issue of this permit shall become void with the issuance of this current version.

• B.2 – This condition states the central mix (CM) and dry batch (TM) processes shall not be operated simultaneously. According to facility representatives, the plant is only able to operate the central mix or dry batch process at any given time and it is not possible to operate both simultaneously.

• B.3 – This condition limits visible emissions from all sources to no more than 20 percent opacity when averaged over a six-minute period. Minimal puffs of visible emissions were briefly observed during the start of truck loading. These emissions were around 10% opacity.

• B.4 – This condition establishes the allowable PM emission rate which was calculated as 61 lbs/hr. The maximum potential emission rate is below this number and compliance is expected as long as the control devices are operating. The facility does not operate the plant without the control devices.
• B.5 – This condition requires the facility to minimize fugitive emissions and prevent them from leaving the property boundary. The facility was not causing nor allowing fugitive dust emissions to leave the property boundary.

• B.6 – This condition states that the facility shall perform an annual inspection of the fabric filter system, as well as requiring the facility to maintain records of all inspections in a logbook. The facility is conducting weekly inspections and routine maintenance on the baghouses (CD-1, CD-2, CD-3, CD-4, CD-5, CD-6), normally on Mondays. On May 22, 2023, the bags were cleaned in the baghouses and the moisture trap was replaced. The facility tracks the pressure drop readings for the Baghouses and if the pressure drop is over 2.5 to 3 inches W.C. the bags are fully cleaned. The pressure drop sits around 1.75 to 2.25 in W.C on average. At the time of the inspection, the pressure drop reading was 2.0 inches W.C. Weekly cleanouts are conducted on the baghouses to ensure proper operation and cleanouts are conducted more frequently if needed depending on demand. The most recently weekly inspection occurred on May 22, 2023. The facility has plans to replace all bags in the baghouses. The new bags are already on-site, and the facility is currently scheduling a time to conduct the maintenance.

• B.7 – This condition states that the facility must submit annual reports to the Agency by February 15th of each year. The facility is submitting annual reports as required. The most recent annual report was submitted on January 10, 2023 and contained all the required information. The facility batched 39,437 cubic yards for 2022. The throughput from January 1, 2023, through May 24, 2023 was 10,437.75 cubic yards.

Compliance History:
The facility does not have any history of recorded violations in the last ten (10) years.

Conclusion:
Based on the above information, Southern Concrete Materials – Biltmore appears to be in compliance with all applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.