

Air Enforcement: Tennessee Air Pollution Control Board Technical Secretary's Order/Assessment of Civil Penalty



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The Technical Secretary of the Tennessee Air Pollution Control Board ("Board") issued a February 24th Technical Secretary's Order and Assessment of Civil Penalty ("Order") addressing an alleged violation by BlockWorks, LLC ("BlockWorks"). See Case No. APC17-0183.

The Order describes BlockWorks as the operator of a Gallatin, Tennessee cement silo ("Facility") as part of its operation.

The Facility had been issued on October 28, 2016, operating permit number 070196P. The operating permit provides the authority to operate a cement silo with baghouse control.

Condition 4 of the Facility's operating permit is stated to provide:

Routine maintenance, as required to maintain specified emission limits, shall be performed on the air pollution control device(s). Maintenance records shall be recorded in a suitable permanent form and kept available for inspection by the Division. These records must be retained for a period of not less than two years.

Personnel from the Division of Air Pollution Control are stated to have conducted an annual compliance inspection at the Facility on November 6, 2017, in response to a follow-up to a citizen's complaint. The complaint is stated to have alleged that dust was being emitted from the top of the silos when they were being filled with cement. The silos are stated to have not been filled during the annual compliance inspection and, therefore, no visible emissions were observed from the silos.

Division of Air Pollution Control personnel are stated to have observed during the inspection that the BlockWorks Facility failed to maintain the maintenance record as required by Condition 4 of the operating permit.

A Notice of Violation was subsequently issued to BlockWorks. The Notice of Violation required that BlockWorks begin maintaining maintenance records and outlined a schedule. The records are stated to have been submitted by BlockWorks on or about January 25th. They have been deemed satisfactory and the company is now in compliance.

The Order assesses a civil penalty of \$1,500.

[A copy of the Order can be downloaded here.](#)

