



# CONCRETE BATCHING PLANT



Environmental  
Compliance

## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 1050294 **DATE:** 06232008 **ARRIVE:** 0900 **DEPART:** 1156

**FACILITY NAME:** CITY OF LAKELAND PUBLIC WORKS-C&M DIV

**ARMS UPDATED**

**FACILITY LOCATION:** 407 FAIRWAY AVE

LAKELAND 33801

**OWNER/AUTHORIZED REPRESENTATIVE:** MICHAEL WHIGHAM **PHONE:** (863)834-3300

**CONTACT NAME:** Arthur Raubolt

**PHONE:** (863)834-3300

**ENTITLEMENT PERIOD:** 4/3/2008 / 4/3/2013  
 (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

Joseph V. Panetta

06/23/2008

Inspector's Name (Please Print)

Date of Inspection

Inspector's Signature

Approximate Date of Next Inspection

**COMMENTS:** Boxes not checked indicate not applicable to this facility due to type of operation or due to rule change.

Spoke with Arthur Raubolt. Talked about the requirements and methods of controlling unconfined emissions. Gave Mr. Raubolt a copy of the rule for concrete batching plants and SBEAP contact information. VE was conducted and observed with New Inspector Natrevia Gradney. Inspection completed after VE.

Loading Rate was 27 TPH.

**VISIBLE EMISSIONS EVALUATION**

COMPANY <i>City of Lakeland Public Works</i>	
UNIT <i>407 Fairway Ave</i>	
ADDRESS <i>Lakeland 33801</i>	
PERMIT NO. <i>1050294</i>	COMPLIANCE YES - NO -
AIRS NO. <i>1050294-005</i>	EU NO. <i>02</i>
PROCESS RATE <i>18.13 TPH &gt; 25 TRPH</i>	PERMITTED RATE <i>≥ 25 TRPH</i>
PROCESS EQUIPMENT <i>Cement Silo</i>	
CONTROL EQUIPMENT <i>BAGHOUSE</i>	
OPERATING MODE <i>Normal</i>	AMBIENT TEMP (°F) START <i>82.0</i> STOP <i>-</i>
HEIGHT ABOVE GROUND LEVEL START <i>35 FT.</i> STOP <i>-</i>	HEIGHT RELATIVE TO OBSERVER START <i>30 FT.</i> STOP <i>-</i>
DISTANCE FROM OBSERVER START <i>180</i> STOP <i>-</i>	DIRECTION FROM OBSERVER START <i>285 NW</i> STOP <i>-</i>
EMISSION COLOR <i>None</i>	PLUME TYPE CONTIN. - <i>None</i> INTERMITTENT -
WATER DROPLETS PRESENT? NO - <i>None</i>	IS WATER DROPLET PLUME ATTACHED - <i>None</i> DETACHED -
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START <i>None</i> STOP <i>-</i>	
DESCRIBE BACKGROUND START <i>sky</i> STOP <i>-</i>	
BACKGROUND COLOR START <i>Blue</i> STOP	SKY CONDITIONS START <i>Scattered</i> STOP <i>-</i>
WIND SPEED (MPH) START <i>0-2</i> STOP	WIND DIRECTION START <i>SE</i> STOP
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0</i>	RANGE OF OPACITY READINGS MIN. <i>0.0</i> MAX. <i>0.0</i>
SOURCE LAYOUT SKETCH	
COMMENTS <i>285 NW</i>	
<i>5-8 PSI 11:07 AM</i>	
<i>11:18:28 Finished</i>	
<i>43.5</i>	

OBSERVATION DATE		START TIME				STOP TIME				
6/23/08		10:35				11:05				
SEC	MIN	0	15	30	45	SEC	1	15	30	45
0	0	0	0	0	0	30				
1	0	0	0	0	0	31				
2	0	0	0	0	0	32				
3	0	0	0	0	0	33				
4	0	0	0	0	0	34				
5	0	0	0	0	0	35				
6	0	0	0	0	0	36				
7	0	0	0	0	0	37				
8	0	0	0	0	0	38				
9	0	0	0	0	0	39				
10	0	0	0	0	0	40				
11	0	0	0	0	0	41				
12	0	0	0	0	0	42				
13	0	0	0	0	0	43				
14	0	0	0	0	0	44				
15	0	0	0	0	0	45				
16	0	0	0	0	0	46				
17	0	0	0	0	0	47				
18	0	0	0	0	0	48				
19	0	0	0	0	0	49				
20	0	0	0	0	0	50				
21	0	0	0	0	0	51				
22	0	0	0	0	0	52				
23	0	0	0	0	0	53				
24	0	0	0	0	0	54				
25	0	0	0	0	0	55				
26	0	0	0	0	0	56				
27	0	0	0	0	0	57				
28	0	0	0	0	0	58				
29	0	0	0	0	0	59				

Observers Signature: *[Signature]*

Date: *6/23/08*

Observers Organization: Florida Department of Environmental Protection

Observer Name and Certified By:

**EASTERN TECHNICAL ASSOCIATES**

**JOSEPH PANETTA**

PAN716659 STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

TAMPA, FL 2/13/2008 358563

SCHOOL LOCATION DATE OF SCHOOL CERT NUMBER

TMPS06 8/14/2008

LAST LECTURE CERTIFICATION EXP DATE BEARER

*82.07 28 wet 8.5 RH 43.5 33333 CBS Amended 48 minutes*

**Panetta, Joe**

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**From:** Raubolt, Arthur [Arthur.Raubolt@lakelandgov.net]  
**Sent:** Thursday, June 05, 2008 11:56 AM  
**To:** Panetta, Joe  
**Cc:** Henry, Danielle D.  
**Subject:** RE: VE Test On New Silo

Good Morning Joe,

The new silo is going to be an addition; it is not replacing the older silo. Both are going to be operational, the older silo had its VE test performed on May 16<sup>th</sup>. Here is the information on the older silo.

1. Belgrade Silo (Steel Tank) is the make.
2. 225 Barrel Round Portable is the model.
3. No serial, can't find drawing anywhere (Belgrade or Scott Equipment)
4. 27 Tons is what it will hold

Thanks Art Raubolt

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**From:** Panetta, Joe [mailto:Joe.Panetta@dep.state.fl.us]  
**Sent:** Thursday, June 05, 2008 7:33 AM  
**To:** Raubolt, Arthur  
**Cc:** Henry, Danielle D.  
**Subject:** RE: VE Test On New Silo

Good Morning Mr. Raubolt,

This new silo, is it a replacement of the cement silo or is it in addition to the cement silo?

If this new silo is replacing the old, we have the same the information you provided below and we have the information we need..

If it is in addition to the old silo, then we need the information on your old silo.

Hope this clears up any miscommunication..

Sincerely,  
Joe

Please feel free to phone or email if you have further questions.

***Joseph V. Panetta***  
***Air Program Compliance***  
***Florida Department of Environmental Protection***

***Southwest District  
13051 North Telecom Pkwy.  
Temple Terrace, FL 33637-0926  
Joe.Panetta@dep.state.fl.us  
(813) 632-7600 ext 105  
S/C: 514-9155 ext 105  
Fax: (813) 632-7668  
Fax: (Suncom) 512-1073***

Please Note: Florida has a very broad Public Records Law. Most written communications to or from State and Local Officials regarding State or Local business are public records available to the public and media upon request. Your email communications may therefore be subject to public disclosure.

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*

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**From:** Raubolt, Arthur [mailto:Arthur.Raubolt@lakelandgov.net]  
**Sent:** Wednesday, June 04, 2008 6:58 AM  
**To:** Panetta, Joe  
**Cc:** Henry, Danielle D.  
**Subject:** VE Test On New Silo

Good Morning Joe,

Sorry about the lack of info on our new silo, here is the information you were looking for.

1. Belgrade Silo (Steel Tank) is the make.
2. 350 Barrel Round Portable is the model.
3. A-120407 is the serial number.
4. 52 tons is how much it will hold.

Art Raubolt

Construction & Maintenance

407 Fairway Ave.

Phone 834-3304

Fax 834-3308

ENT'D JUN 03 2008

**Hughes, Rhonda**

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**From:** Henry, Danielle D.  
**Sent:** Tuesday, June 03, 2008 10:40 AM  
**To:** Panetta, Joe; Hughes, Rhonda  
**Cc:** Simmons, Wendy; Gradney, Natrevia  
**Subject:** FW: New Silo Operating/VE Testing

Rhonda,

Please add the initial test on the calendar and provide a hard copy for Joe.

Joe,

Please plan to attend the VE noted below. According to the inspector spreadsheet, it appears this facility is also do for an inspection. Please coordinate this combined VE test and inspection site visit with Wendy and Natrevia for training purposes.

Thank you,  
Danielle

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**From:** Raubolt, Arthur [mailto:Arthur.Raubolt@lakelandgov.net]  
**Sent:** Tuesday, June 03, 2008 8:40 AM  
**To:** Henry, Danielle D.  
**Cc:** Whigham, Michael; More, Christine  
**Subject:** New Silo Operating/VE Testing

Danielle,

We have started operating the new silo on Friday May 30<sup>th</sup>; we would like to have the VE test done within the next thirty days.

1. Name of Facility- Public Works, Construction & Maintenance, 407 Fairway Ave Lakeland, Florida 33801
2. Date of Testing- June 23<sup>rd</sup>
3. Consultant doing testing- Christine More, Electric Department; Energy Production
4. Time of testing- 10:00am
5. I.D. Number- ARMS No. 1050294-005
6. Contact Info.- Art Raubolt ([arthur.raubolt@lakelandgov.net](mailto:arthur.raubolt@lakelandgov.net))( [mike.whigham@lakelandgov.net](mailto:mike.whigham@lakelandgov.net))  
Phone 863.834.3300 or 863.834.3301

Thanks Art Raubolt

Construction & Maintenance

*Phil Raubolt*

407 Fairway Ave.

Phone 834-3300

Fax 834-3308