



# Florida Department of Environmental Protection

Northwest District  
160 Governmental Center, Suite 308  
Pensacola, Florida 32502-5794

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

August 10, 2009

BY ELECTRONIC MAIL  
Jim.Forbes@lafarge-na.com

Mr. Jim Forbes  
Regional Environmental Director  
Lafarge Building Materials, Inc.  
12735 Morris Road Extension  
Suite 300  
Alpharetta, Georgia 30004

Dear Mr. Forbes:

On July 17, 2009, a Department representative with the Air Resource Management Program inspected your facility, ID 0330070. A copy of the inspection report is enclosed. The inspection and a review of Department records indicate the facility was in compliance at the time of the inspection for those sources specifically listed on the inspection report.

This letter applies only to activities covered by the Air Resource Management Program. If you have any questions, please contact Jennifer Waltrip at 850/595-8300, extension 1222 or [Jennifer.Waltrip@dep.state.fl.us](mailto:Jennifer.Waltrip@dep.state.fl.us).

Sincerely,

A handwritten signature in black ink that reads 'Erica Mitchell'.

Erica Mitchell  
Air Compliance Supervisor

EM/jw/c

Enclosure

c: Robert Eaton, Lafarge North America, Inc. ([Robert.Eaton@lafarge-na.com](mailto:Robert.Eaton@lafarge-na.com))



# CONCRETE BATCHING PLANT



## COMPLIANCE INSPECTION CHECKLIST

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

**AIRS ID#:** 0330070 **DATE:** 7/17/09 **ARRIVE:** 9:53 AM **DEPART:** 10:08 AM  
**FACILITY NAME:** PENSACOLA CONCRETE PLANT  
**FACILITY LOCATION:** 100 E OLIVE RD  
 PENSACOLA 32504  
**OWNER/AUTHORIZED REPRESENTATIVE:** JAMES FORBES **PHONE:** (678)746-2295  
**CONTACT NAME:** Danny Byrd **PHONE:** (850)476-7328  
**ENTITLEMENT PERIOD:** 10/20/2005 / 10/20/2010  
(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**

- Were visible emissions tests conducted during this site visit according to EPA Method 9 (Ref.: Chapter 62-297, F.A.C.)?-----  Yes  No
- 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
- 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
- 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
  - Was the batching operation in operation during the visible emissions test?-----  Yes  No
  - During the visible emissions test, was the batching rate representative of the normal batching rate and duration?-----  Yes  No
- 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**

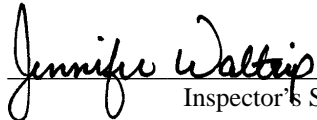
1. Since the last inspection has there been
  - a) installation of any new process equipment?-----  Yes  No
  - b) alterations to existing process equipment without replacement?-----  Yes  No
  - c) replacement of existing equipment substantially different than that noted on the most recent notification 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

Jennifer Waltrip

July 17, 2009

Inspector's Name (Please Print)

Date of Inspection



Inspector's Signature

July 2010

Approximate Date of Next Inspection

**COMMENTS:** Department personnel conducted an unannounced annual air program compliance inspection on July 17, 2009 at the Lafarge facility located in Escambia County. Mr. Danny Byrd was present to assist during the inspection.

The facility was not in operationd at the time of the inspection. There are three storage silos onsite for cement, flyash, and slage. Particulate emissions are controlled by a single dust collector for the silos and truck batching process. The drop point where the trucks load the concrete also has a shoot and partial enclosure.

The yard is paved to help control fugitive emissions. Fugitive emissions from the stockpiles are controlled by storing them within three walls which are connected to a sprinkler system.

The most recent annual visible emissions ("VE") test was conducted on June 12, 2009. Results of the test showed no excess emissions, however, the test results submitted to the Department indicated that the batching operation was not active during the test. Please note that batching is required to occur during future test reports. Rule 62-296.414(3)(c), Florida Administrative Code states that 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... each test report shall state the actual silo loading rate during emissions testing and, if applicable, whether or not batching occurred during emissions testing.