TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Mancil's Tractor Service, Inc.
4551 SE Hampton Court
Stuart, Florida 34997

Palm City Asphalt Plant
Facility ID No. 0850159
8540 SW Jayme Way
Palm City, Florida 34990

PROJECT

Project No. 0850159-001-AC
Application for Minor Source Air Construction Permit
Initial Construction Permit

COUNTY

Martin County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Southeast District Office
400 North Congress Avenue, 3rd Floor
West Palm Beach, Florida 33401

Date

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Mancil's Tractor Service, Inc. proposes to construct a new 120 ton per hour asphalt production plant, which is categorized under Standard Industrial Classification Code No. 2951. The facility will be located in Martin County at 8540 SW Jayme Way in Palm City, Florida. The UTM coordinates of the new facility are Zone 17, 562.51 km East, and 3006.72 km North. This site is in an area that is in attainment for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

Mancil's Tractor Services, Inc. proposes to construct and operate an asphalt production plant. The plant will be of a parallel flow design and will be capable of producing approximately 120 tons of asphalt per hour, and 300 to 400 tons of asphalt per day. The production plant will load approximately 15 to 20 trucks per day and will operate Monday through Friday, 8 a.m. to 5 p.m. The plant will use an ALmix Model 6626 Drum Mixer employing a Genco Astra Flame burner assembly burning No. 2 fuel oil. Particulate emissions from the Drum Mixer will be controlled by a baghouse designed to handle 24,000 cfm at an air to cloth ratio of 5.3 to 1.

The Drum Mixer will utilize liquid asphalt from a 20,000 gallon hot oil coiled asphalt storage tank. A Burke Model HCH-10 helical coil type heater is used with a heating capacity of 1MMBtu/hr to heat the asphalt also using No. 2 fuel oil. Aggregate storage and feed systems will also be utilized in the operation.

Asphalt from the Drum Mixer can be stored in two silos capable of holding 100 tons each, or loaded directly into a truck for transport.

The facility intends to include a reclaimed asphalt pavement (RAP) operation at the facility in the future, but is not seeking to permit this activity at this time. Therefore, **no RAP processing (crushing) will be allowed at the facility by this permit.**

Processing Schedule

March 14, 2014 Received the application for a minor source air pollution construction permit.

2. PSD APPLICABILITY

Per 62-210.300(3)(c)2., the facility is exempt from the requirement to obtain a Title V air operation permit under the provisions of Chapter 62-213, F.A.C., provided the conditions below of exemption for the facility are met. Facilities exempt from Title V air permitting pursuant to subparagraph 62-210.300(3)(c)2., F.A.C., are not exempt from the requirement to obtain an air construction permit or non-Title V air operation permit. A facility shall not be entitled to an exemption from Title V air permitting under this rule if it is a Title V source pursuant to paragraph (f), (g), or (h) of the definition of "major source of air pollution" or the facility would be classified as a Title V source as a result of the combined potential to emit regulated pollutants of all emissions units at the facility.

a. The production rate of asphaltic concrete shall not exceed 500,000 tons in any consecutive twelve-month period.

b. Fuel oil consumption shall not exceed 1.2 million gallons in any consecutive twelve-month period.

c. Fuel oil shall not exceed 1.0 percent sulfur content, by weight. The owner shall maintain records to demonstrate that each shipment of fuel oil has 1.0 percent or less.

d. Particulate matter (PM) emissions shall not exceed 0.04 grains per dry standard cubic foot averaged over a three-hour period, if the facility is subject to 40 C.F.R. 60.90, Subpart I. If the facility is not subject to Subpart I, it shall not exceed the applicable particulate emission limiting standard pursuant to paragraph 62-296.320(4)(a), F.A.C., and its hours of operation shall not exceed 4,000 hours in any consecutive twelve-month period.

e. Fugitive PM emissions shall be controlled in accordance with the requirements of paragraph 62-296.320(4)(c), F.A.C.

f. Visible emissions (VE) shall not be equal to or greater than 20 percent opacity.

g. The owner or operator shall maintain records to document the monthly and the twelve-month rolling totals of tons of asphaltic concrete produced, the gallons of fuel oil consumed, and the hours of operation. Such records shall be retained for five years.

h. The owner or operator shall submit an Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) to the Department annually pursuant to subsection 62-210.370(3), F.A.C.

i. The owner or operator shall submit a stack test using EPA Reference Method 5 or 5A and a visible emission (VE) test using EPA Reference Method 9, incorporated and adopted by reference in Rule 62-204.800, F.A.C., that demonstrate compliance with the applicable PM and VE standards, respectively, to the Department by March 15, 1996, and annually thereafter during each federal fiscal year (October 1-September 30).

j. An asphalt plant claiming this exemption from Title V air permitting shall not collocate with, or relocate to, any Title V source unless the Title V permit specifically allows such facility to be collocated with or relocated to the Title V source and operated under the authority of the Title V permit while onsite at the Title V source. An asphalt plant cannot apply this exemption if it creates a Title V source in combination with any other collocated facilities, emissions units, or pollutant-emitting activities, including any such facility, emissions unit, or activity that is otherwise exempt from permitting.

k. The owner or operator of any facility claiming this exemption must have authorization to operate by a non-Title V air operation permit that implements the requirements of sub-subparagraphs 62-210.300(3)(c)2.a. through j., F.A.C.

As provided in the application, the following table summarizes estimated emissions for the project.

Table A. Estimated Emissions (Tons/Year)

Pollutant	Project Estimated Emissions (TPY)
CO	9.44
NO_X	9.13
PM/PM_{10}	10.2/3.29
SO_2	2.8
VOC	2.5
Total HAP	0.5

State Requirements

62-4 F.A.C.	Permits
62-204.220	Ambient Air Quality Protection
62-204.240	Ambient Air Quality Standards
62-204.800(8)(b)13.	Hot Mix Asphalt Facilities
62-210	Stationary Sources
62-210.200	Definitions
62-210.300	Permits Required
62-210.300(3)(c)2.	Conditional Exemptions from Title V Air Permitting - Facilities comprising asphalt concrete plants
62-210.350	Public Notice and Comments
62-210.370(3)	Annual Operating Report for Air Pollutant Emitting Facility
62-210.650	Circumvention
62-210.700	Excess Emissions 62-210.900Forms and Instructions
62-296.320	Emission Standards
62-297	Testing, Reporting and Record Keeping

Federal NSPS Provisions

40 CFR 60 Part A
40 CFR 60 Part I (adopted and incorporated by reference in 62-204.800(8)(b)13.)

Federal NESHAP Provisions

NESHAP provisions will not apply to this facility.

3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Scott D. Trainor is the project engineer responsible for reviewing the application and drafting

the permit. Additional details of this analysis may be obtained by contacting the project engineer at the

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