TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Ajax Paving Industries of Florida, LLC
510 Gene Green Road
Nokomis, FL 34275

Odessa Facility – Plant No. 5

Facility ID No. 1010027

PROJECT

Project No. 1010027-013-AC
Application for Minor Air Construction Permit
Project Name: Increase Maximum Throughput of Reclaimed Asphalt Pavement (RAP) Crushing System

COUNTY

Pasco County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air and Solid Waste Permitting
Southwest District Office
Temple Terrace, Florida 33637-0926

January 6, 2015

Prepared by Sara Gonzalez

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.

I. Facility Description:

This facility operates a drum mix asphalt concrete plant. A portable reclaimed asphalt pavement crushing (RAP) system is brought on site occasionally to crush RAP into a smaller size.

II. Project Description:

A. Applicant:

Vince L. Hafeli, Vice President, Plants & Materials
Ajax Paving Industries of Florida, LLC
510 Gene Green Road
Nokomis, FL 34275

B. Professional Engineer:

Lynn Robinson, P.E.
Southern Environmental Services, Inc.
1204 North Wheeler Street
Plant City, FL 33563

C. Project Location:

11603 State Road 54 West
Odessa, FL 33556

D. Project Summary:

To increase the RAP crushing system's maximum throughput limit from 187,500 to 250,000 tons/any consecutive 12-month period for E.U. No. 009 – Portable Reclaimed Asphalt Pavement (RAP) Crushing System.

E. Application Information:

Application Received on: December 19, 2014
Application Complete on: December 19, 2014

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	RAP crushing operations are a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	RAP crushing operations is not a source of VOC or odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Pasco County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	The RAP crusher is exempt from PM RACT due to being built after 1988
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	EU 009 is subject to 40 CFR 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required for EU No. 009

IV. Summary of Emissions

Emission Unit No. 009 – RAP Crushing System[1]

Pollutant	**EU No. and brief description**	**Potential Emissions** (tpy)	**Allowable Emissions**
PM	009	8.9	VE – 20/15/10%
PM_{10}	009	4.4	n/a

[1] *Based on 250,000 TPY RAP, sixteen emission points, and emission factors from AP-42 Table 11.19.2-2.*

Total Facility Emissions[2, 3]

Pollutant	**Potential Emissions** (tpy)	**Allowable Emissions**
PM	30.36	0.04 gr / dscf
PM_{10}	17.11	n/a
SO_2	57.67	n/a
CO	66.88	n/a
NOx	35.93	n/a
VOC	16.58	n/a
HAPs	8.16	n/a

[2] Using worst-case fuel

[3] See Technical Evaluation dated August 27, 2009 for Air Construction Permit 1010027-007-AC for potential emissions for exempt emissions sources and EU 004.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. 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. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).