TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Orlando Paving Company
A Division of Hubbard Construction Company
1936 Lee Road, Suite 101
Winter Park, FL 32789

Plant #3 (Oviedo)
1694 West Broadway Street
Oviedo, FL

Facility ID No. 1170030

PROJECT

Project No. 1170030-008-AF
Application for Minor Source (Synthetic Minor) Air Operation Permit
Project Name: Asphalt Plant Permit Renewal

COUNTY

Seminole County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

May 22, 2012

Prepared by Jeffrey Rustin, P.E.

TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

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. <u>Project Description:</u>

A. Applicant:

Mr. Mike Stacey, Manager-Plants and Materials
Orlando Paving Company
1936 Lee Road, Suite 101
Winter Park, FL 32789

B. Professional Engineer: N/A

C. Project Location:

1694 West Broadway Street
Oviedo, FL 32765

D. Project Summary:

The purpose of this project is to renewal the previous Air Operation Permit.

E. Application Information:

Application Received and Complete on: 03/13/2012

II. Rule Applicability

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 62-212.400, 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	Source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Source of VOCs and odor.
Rule 62-296.400, 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	Seminole County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	– EU Nos. 001 and 002 is subject to 40 CFR 60, Subpart A, where applicable. – EU No. 001 is subject to 40 CFR 60, Subpart I. – EU No. 002 is subject to 40 CFR 60, Subpart OOO.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants	N	There is no applicable source category.

Subject to:	Y/N	Comments
(NESHAPS – 40 CFR 61)		
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	N	Facility is a synthetic non-Title V source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE and PM testing are required for EU Nos. 001 and 002.

IV. Summary of Emissions

Based on permit limit of 4000 operation hours (asphalt plant), 400 TPH, #5 used fuel oil, baghouse operating properly.

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (gr/dscf, opacity)
PM	EU No. 001- Drum Mix Asphalt Plant w/ Baghouse	35.66	0.04
	EU No. 002- Portable Recycled Asphalt Product (RAP) Crushing System	3.7	
	Total	**38.66**	
VOC	EU No. 001- Drum Mix Asphalt Plant w/ Baghouse	8.00	
NO_x	EU No. 001- Drum Mix Asphalt Plant w/ Baghouse	13.75	
SO_2	EU No. 001- Drum Mix Asphalt Plant w/ Baghouse	14.50	
CO	EU No. 001- Drum Mix Asphalt Plant w/ Baghouse	32.50	

V. Federal NSPS and/or NESHAP Provisions

A. NSPS, 40 CFR 60 Subpart A, General Provisions

B. NSPS, 40 CFR 60 Subpart I, Standards of Performance for Hot Mix Asphalt Facilities

C. NSPS, 40 CFR 60 Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants

D. NSPS, 40 CFR 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

E. NESHAP, 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

VI. 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.

The crusher is not subject to 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ if the crusher does not stay at the site twelve consecutive months or more.

VII. 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, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

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).