TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Anderson Columbia Company, Inc.
Post Office Box 1829
Lake City, Florida 32056

ARMS Facility ID No. 7770017

PROJECT

Project No. 7770017-018-AF
FESOP Modification- Relocation of facility and addition of portable Recycled Asphalt Pavement (RAP) crusher

COUNTY

Dixie

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Northeast District Office
Waste and Air Resource Management
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

May 30, 2014

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:

Table 1 - Applicable Rules from the F.A.C.

Chapter	Description
62-4	Permits
62-204	Air Pollution Control – General Provisions
62-210	Stationary Sources of Air Pollution – General Requirements
62-212	Stationary Sources – Preconstruction Review
62-296	Stationary Sources – Emission Standards
62-297	Stationary Sources – Emissions Monitoring

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 activities. 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.

Federal regulations adopted by reference are given in Rule 62-204.800, F.A.C. State regulations approved by EPA are given in 40 CFR 52, Subpart K – Florida, also known as the State Implementation Plan (SIP) for Florida.

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 Process Description and Location

Anderson Columbia Company, Inc., operates Asphalt Plant No. 10, which is an existing relocatable Hot Mix Asphalt Plant classified in the Asphalt Paving and Roofing category (Standard Industrial Classification Code 2951). This project permits the relocation of the facility to Dixie County at 146 Southeast 117th Avenue, Old Town, Dixie County; UTM Coordinates: Zone 17, 300.67 km East and 3276.18 km North; and, Latitude: 29°35’58” North and Longitude: 83°03’30” West. This site is an area that is in attainment (or designated as unclassifiable) for all pollutants subject to a National Ambient Air Quality Standard (NAAQS).

Existing Facility

The asphalt concrete plant, subject to 40 CFR 60, Subpart I, is allowed to process virgin aggregate, and/or recycled asphalt pavement (RAP) and liquid asphalt and is designated as Emission Unit No. 001. No. 2 fuel oil and on-specification used oil (No. 5 grade fuel oil) may be used to fire the asphalt concrete plant's dryer. The No. 2 and No. 5 fuel oil's maximum sulfur content by weight are not to exceed 0.5%. The asphalt concrete plant dryer's particulate emissions are controlled by a baghouse with a cyclonic inlet section, having a total number of 1088 bags with filtration area of 10,370 square feet. The filter bags are cleaned in sequence by an air pulsejet cleaning system. Associated with the asphalt concrete plant is a liquid asphalt heater fired with new No. 2 fuel oil or on-specification used oil (No. 5 grade fuel oil). The fuel oil used for the heater has a maximum sulfur content of 0.5% by weight. Although the heater is deemed an insignificant source pursuant to Rule 62-4.040, F.A.C., fuel oil usage and fuel oil sulfur content are tracked as part of the facility in order to demonstrate compliance with Rules 62-210.300(3)(c)1.b. and 62-210.300(3)(c)1.c., F.A.C. The No. 2 fuel oil and on-specification used No. 5 fuel oil are stored in separate tanks.

The permittee has requested the asphalt concrete plant and associated liquid asphalt heater be subject to the provisions of Rule 62-210.300(3)(c)1., F.A.C. (Conditional Exemptions From Title V Air Permitting). The conditions of this permit which were in previous operation permit No. 7770017-002-AO designate this facility as a synthetic non-Title V source, since the total emissions from this facility are less than the Title V permitting thresholds.

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility does not operate 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 a synthetic Non-Title V source.
- 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.
- This facility has one or more emissions units subject to NSPS (40 CFR 60)

Processing Schedule

5/28/14 Department received the Application for Air Permit – Long Form

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 the draft permit distributed with this evaluation.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, Portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

Project Description

The purpose of this modification to FESOP No. 7770017-016-AF is to relocate the facility to Dixie County and to authorize the use of a portable RAP crusher. It was determined that a construction permit would not be necessary to add a RAP crusher so long as any crusher brought onto the site already holds a valid Air General Permit. The crusher is also limited to 50,000 tons/year throughput. The emissions factors used to calculate emissions for the crusher are as follows:

Crusher: 0.0054 lb/ton
Conveyer: 0.003 lb/ton
Screen: 0.025 lb/ton
[Emissions factors from AP-42, Table 11.19.2-2.]

Total PM emissions due to the RAP Crusher System are calculated to be 0.835 tons/year. Any fuel used to operate the crusher is subject to the facility-wide fuel usage limitations already included in the permit.

This project is labeled a Federally Enforced State Operating Permit due to additional limitations taken on by the facility beyond what the rules call for in order to address comments made concerning the operation of this facility at a previous location.

PSD Applicability for Project

This facility is not one of the 28 categories listed in Rule 62-210.200 (195), F.A.C. Because the facility's potential to emit is less than 250 tons per year of PSD pollutant, the facility is not a PSD major source. This project is not subject to PSD preconstruction review requirements since the proposed project itself will not result in a major (250 tons per year) increase of emissions.

Rule Applicability

NESHAP Applicability

The facility does not have any emissions units or activities that are subject to the NESHAP provisions.

Title V Exemptions for Relocatable Asphalt Plants

Rule 62-210.300(3)(c)2., F.A.C., lists a set of conditions an asphalt plant must follow in order to be exempt from the obligation to obtain a Title V permit. This project is labeled a Federally Enforced State Operating Permit due to additional limitations taken on by the facility beyond what the rules call for in order to address comments made concerning the operation of this facility at a previous location.

NSPS Applicability

The Hot Mix Asphalt Concrete Plant is subject to Subpart I – Standards of Performance for Hot Mix Asphalt Facilities.

The portable RAP crusher is subject to Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants.

4. DETERMINATION

The Department makes a determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the 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 permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Brent Steele 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 Florida Department of Environmental Protection, Northeast District Office, 8800 Baymeadows Way West, Suite 100, Jacksonville, FL 32256, Phone: 904/256-1700.