Florida Department of

Memorandum

Environmental Protection

TO: Rick Bradburn
THROUGH: Armando Sarasua, P.E.
FROM: John Fleck
DATE: February 24, 2009
SUBJECT: Evaluation Summary for Group III Asphalt, Inc., Milton Plant
7775008-011-AO, Santa Rosa County

We recommend issuing a revised permit to Group III Asphalt, Inc., to operate their Milton Plant. This is a second revision to air operating permit 7775008-007-AO issued July 26, 2006, which was previously modified by permit 7775008-009-AO issued August 15, 2007. This revision incorporates terms and conditions of construction permit 7775008-010-AC issued April 17, 2008 for the new drum mixer plant. The facility started up the new Hot Mix Asphalt Plant, EU 005, and shut down the old Hot Mix Asphalt Plant (EU 001), effective October 22, 2008.

Process Description.

This facility is a new relocatable drum mix asphalt plant. Aggregate and recycled asphalt product are mixed in a rotating drum with hot liquid asphalt. The mix in the drum is heated by a fuel oil fired burner. The hot asphalt concrete mix is then conveyed to a storage silo for loading into trucks. Particulate emissions from the plant are controlled by a baghouse. The fines from the baghouse are recycled into the asphalt mix. Fugitive emissions at the facility result from uncontrolled process emissions, aggregate stockpiles, and vehicular traffic.

Pollution Control Equipment.
Particulate emissions from the drum mixer are controlled by a baghouse (BH-1). Particulate emissions from the dust storage silo are controlled by a second baghouse (BH-2). Emissions of SO2 are controlled by using low-sulfur oil in limited quantities.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions*		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	62-204.800(8)(b)12	N/A	15.0	0.04 gpdscf	<100
SO2	N/A	N/A	47.0**	N/A	<100
VOC	N/A	N/A	9.4	N/A	<100
NOx	N/A	N/A	14.3	N/A	<100
CO	N/A	N/A	32.8	N/A	<100
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-204.800(8)(b)12	N/A	N/A	Not more than 20% opacity	

*Total facility, includes fugitive emissions. RAP crusher not included for PM; however, fuel usage is part of the 1.2 MMGAL limit and therefore contribute to the SO2, VOC, NOx and CO.

** SO_2 emissions for the hot mix drum based on AP 42 11.1-7, which states that 50% of the fuel bound sulfur, up to a maximum (as SO_2) of 0.1 lb/ton of product is expected to be retained in the product with the remainder emitting as SO_2.

Applicable Rules & Regulations. The facility is regulated under NSPS-40 CFR 60 subpart I (Standards of Performance for Hot Mix Asphalt Facilities and Rule 62-210.300(3)(c)2, F.A.C. (Conditional Exemptions from Title V Permitting). The facility is a synthetic minor source with annual throughput limited to 500,000 tons of asphalt concrete per year. The fuel oil consumption by the liquid asphalt heater, asphalt concrete plant and Rap crusher is limited 1.2 million gallons in any consecutive 12-month period. The sulfur content of the fuel oil for the drum burner and RAP crusher shall not exceed 0.8percent by weight and the sulfur content of the fuel oil for the liquid asphalt heater shall not exceed 0.6 percent by weight as requested by permittee.

Compliance Monitoring.
Annual VE and PM testing for the asphalt concrete plant.

Compliance History.
2008-2004 – Inspections noted to be "In-compliance." A recommendation was made for the facility to continue with commendable efforts to comply with all terms and conditions of the permit.

Fee Summary. This is an AO2A ($1,500 fee) minor source with a stack test. The original construction permit fee was $2,000 for an AC1D facility (source less than 50 TPY).

JF/c