Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Baker Infrastructure Group
100 Morgan Industrial Blvd.
Garden City, GA 31408

Air Permit No. 7775083-009-AO
Date of Issue: June 13, 2012
Expiration Date: June 13, 2017

Authorized Representative:
Robert Land, President

Non-Title V Air Operation Permit
Renewal

This is the final air operating permit, which authorizes the renewal of permit no. 7775083-006-AO to operate the St. Johns County, FL facility, which is a relocatable Asphalt Batch Plant (Standard Industrial Classification No. 2951). The facility is authorized for operation at 125 International Parkway, St. Augustine, in St. Johns County, Florida. The UTM coordinates are Zone 17, 468.3 km East, and 3296.5 km North.
This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution operation permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.).

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Khalid Al-Nahdy

Khalid Al-Nahdy, P.E.
District Air Program Administrator

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on June 13, 2012, to the persons listed below.

Robert Land, Baker Infrastructure Group (landb@reevescc.com)
Frank Darabi, Darabi & Associates, Inc. (fdarabi@darabiassociates.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Shane Maghen June 13, 2012
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing facility consists of the following emissions units:

Facility ID No. 7775083	
ID No.	**Emission Unit Description**
001	400 TPH Double Barrel Drum Mix Asphalt Plant

The 400 TPH Double Barrel Drum Mix Asphalt Plant includes a CMI Model RA 318 baghouse with an integral inertial inlet section (cyclone) to control particulate emissions.

Exempt Emission Points associated with the Asphalt Batch Plant:
(1) Hot Oil Heater
(2) Asphaltic Concrete Storage Tanks

OPERATING LOCATION

Currently, the facility is located in Garden City, GA. The facility is authorized to locate in the Florida counties listed in this permit, provided the preconditions for relocation, as provided by this permit, are met. The facility is not authorized to locate in any Florida county not listed in this permit. The facility is not authorized to relocate to any other location in any Florida county listed without having first fully complied with all requirements of this permit, for relocation.

Facility Regulatory Classification

- The facility is 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 (CAA).
- 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(PSD), F.A.C.

This emissions unit is regulated under the following:

40 CFR 60, Subpart I - Standards of Performance for Hot Mix Asphalt Facilities, and 40 CFR 60, Subpart A, General Conditions.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to this District office. The Permitting Authority phone number is (904) 256-1700.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Florida Department of Environmental Protection (Department). The mailing address is 7825 Baymeadows Way, Suite B-200, Jacksonville, Florida 32256-7590. All documents related to compliance of an emissions unit shall be submitted to this District office. The Compliance Authority phone number is (904) 256-1700.

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements
   e. 40 CFR 60, Subpart A, General Conditions

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Application for Non Title V Permit Renewal: This permit authorizes operation of the permitted emissions units. The permittee shall apply for a Non-Title V air operation permit renewal (DEP Form No. 62-210.900(4), F.A.C.) at least 60 days prior to expiration of this permit. To apply for a Non-Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require.

The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050, 62-4.220, F.A.C.]

8. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.
[Rule 62-4.070(3), F.A.C.]

9. The I.D. No. and Project name for this source shall be used on all correspondence.
[Rule 62-4.070(3), F.A.C.]

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	400 TPH Double Barrel Drum Mix Asphalt Plant with Cyclone and Baghouse for PM control

PERFORMANCE RESTRICTIONS

1. **Hours of Operation.** The hours of operation **are limited** to 1250 hours/year and **shall** be recorded.
   [Rules 62-4.070(3), 62-4.160(1), 62-210.200(PTE), F.A.C., and applicants request]

EMISSIONS STANDARDS

2. **Permitted Maximum Allowable Emission Rate**. The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	LOCATION	EMISSION RATE		RULE
VE	EU 001	<20 % Opacity **NOTE (2)**		40 CFR 60.92(a)(2)
PM	EU 001	0.04 gr/DSCF **NOTE (1)**	8.16 TPY **NOTE (1) & (3)**	40 CFR 60.92(a)(1)

NOTE (1) Basis: 38,100 DSCFM; 1250 hours per year.
NOTE (2) This opacity standard applies at all times except during periods of startup, shutdown, and malfunction of the emissions unit.
[40 CFR 60.92(a)(2); 40 CFR 60.11(c); Rule 62-204.800(7)(b)12., F.A.C., Rule 62-210.300(3)(c)2.f., F.A.C.]
NOTE (3) Particulate Matter emissions from this emissions unit shall not exceed 0.04 grains per dry standard cubic foot, averaged over a three-hour period
[40 CFR 60.92(a)(1); Rule 62-204.800(7)(b)12., F.A.C. Rule 62-210.300(3)(c)2.d., F.A.C.]

3. **Sulfur Content**. The sulfur content of all fuel oil shall not exceed 1.0% sulfur by weight
   [Rule 62-210.300(3)(c)2.c., F.A.C.]

4. **Permitted Capacity**. The maximum operating rates are listed below and **shall not** be exceeded without prior Department approval. [Rule 62-210.200(PTE), F.A.C.]

MATERIAL	EMISSION UNIT	Rate
Asphalt Concrete	EU 001	400 TPH and 500,000 TPY **NOTE (1)**

MATERIAL	EMISSION UNIT	Rate
#2 Fuel Oil	EU 001	Total fuel oil consumption shall not exceed **1.2 million gallons in any consecutive 12 - month period** [Rule 62-210.300(3)(c)2.b., F.A.C.]

NOTE (1) Maximum Annual Production limit was requested by Applicant.
[Application No. 7775083-009-AO]

TESTING REQUIREMENTS

5. **Particulate Matter Emissions – (EU 001).** The test method for particulate matter emissions shall be EPA Method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C. The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf). EPA Methods 1, 2, 3, and 4, incorporated and adopted by reference in Chapter 62-297, F.A.C., shall also be used as required by EPA Method 5.

   The particulate matter emissions test shall be conducted concurrently with the visible emissions test required in **Specific Condition No. 6.**

   A compliance test for particulate matter emissions shall be conducted on an annual basis, at least once each federal fiscal year (October 1 – September 30). An initial compliance test shall be conducted within 30 days of relocating to Florida from Georgia.
   [40 CFR 60.8(a); 40 CFR 60.93(a); 40 CFR 60.93(b)(1); Rule 62-4.070(3),F.A.C.; Rule 62-210.300(3)(c)2.i., F.A.C]

6. **Visible Emissions – (EU 001).** The test method for visible emissions shall be EPA Method 9, incorporated and adopted by reference in Chapter 62-297, F.A.C. The test shall be conducted by an observer certified in accordance with the requirements of Rule 62-297.320, F.A.C. – Standards for Persons Engaged in Visible Emissions Observations.

   The visible emissions test shall be conducted concurrently with the particulate matter emissions compliance test required in Specific Condition No. 5.

   A visible emissions test shall be conducted on an annual basis, at least once each federal fiscal year (October 1 – September 30). An initial compliance test shall be conducted within 30 days of relocating to Florida from Georgia. [40 CFR 60.8(a); 40 CFR 60.93(a); 40 CFR 60.93(b)(2); Rule 62-297.310(7)(a)4.a., F.A.C.; Rule 62-210.300(3)(c)2.i., F.A.C]

7. **EPA Method 9 – Required Sampling Time.** The required minimum period of observation for each compliance test shall be thirty (30) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.
   [Rule 62-297.310(4)(a)2., F.A.C.]

8. **Sulfur Content of Fuel Oils.** In lieu of a sulfur dioxide test, a certified ASTM fuel oil analysis shall be conducted to determine the weight percent of sulfur and the fuel oil heat content. The report shall include the certified ASTM analysis and the sulfur dioxide emission calculations (A copy of a certified ASTM fuel oil analysis of the oil delivered is acceptable). The test method to determine the sulfur content by weight of all fuel oils shall be either ASTM D4057-88 and ASTM D129-91, ASTM D2622-94, or ASTM D4294-90, adopted and incorporated by reference in Rule 62-297.440(1), F.A.C.
[Rule 62-4.070(3), F.A.C.; Rule 62-210.300(3)(c)2.c., F.A.C.]

RECORDS AND REPORTS

9. **Annual Operating Report (AOR):** 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 for each calendar year on or before April 1 pursuant to Rule 62-210.370(3)(c), F.A.C.
[Rule 62-210.300(3)(c)2.h., F.A.C.]

10. **Fuel Oil Sulfur Content Records.** The permittee shall maintain records on-site to demonstrate that each shipment of fuel oil meets sulfur content requirements specified in **Specific Condition No. 3.**
[Rule 62-4.070(3), F.A.C. and Rule 62-210.300(3)(c)2.c., F.A.C.]

11. **Recordkeeping.** The owner or operator shall maintain records to document the monthly and the twelve month rolling totals of tons of Asphalt Concrete produced, the gallons of fuel oil consumed, and the hours of operation. These records shall be retained for five years.
[Rule 62-210.300(3)(c)2.g., and Rule 62-4.070(3), F.A.C.]

12. **Notification of Intent to Relocate**. The owner or operator of the facility must submit a Notification of Intent to Relocate Air Pollutant Emitting Facility [DEP Form No. 62-210.900(6)] to the Department's District office or the appropriate local program office at least thirty (30) days prior to the change, if the facility would be relocated to a county listed in this permit as a county in which the facility is authorized to locate. The form may not be used unless the facility is currently authorized by this permit to locate in the county to which it intends to relocate. The permittee may not use DEP Form No. 62-210.900(6) to request any change to any permit term. If the facility is not currently authorized to locate in the county to which it intends to relocate, a permit application form, with appropriate fee, must be submitted to apply for authorization to locate to that county, and the appropriate Department's District office or approved local program office shall process the application as a permit modification under Rule 62-4.080, F.A.C. The appropriate Department's District office or approved local program office shall amend the facility air permitting record upon each change of location of the facility. An asphalt plant claiming this exemption from Title V air permitting shall not collocate with, or relocate to, any Title V source; nor shall it create 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.
[Rule 62-210.370(1), F.A.C.; Rule 62-210.300(3)(c)1.j., F.A.C]