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OPERATIONS, MAINTENANCE, AND ENVIRONMENTAL COMPLIANCE PLAN
FACILITY ID NO. 0630002

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Introduction

This plan provides information demonstrating the owner's commitment to operating facility in compliance with DEP Operation Permit requirements and provide assurance that the operation of this facility will be in accord with applicable laws and rules.

This plan was developed in accordance with specific requirements of this facility and provides management and operator(s) with adequate information and description regarding the design, operation and maintenance features of this facility. It is used in conjunction with plant operation/maintenance manual, supplied by plant manufacturer (Standard Havens), to train new plant operator(s) and provide continuous education.

Corporate Commitment

Baxter Asphalt & Concrete, Inc. adheres to a strong company-wide environmental program. The company relies on past experience with asphalt plants to assure quality plant operation and employee training, as well as protection of surrounding environment.

It is the company's belief that commitment from all its' employees, especially top management, is what gets the job done. All of our managers realize that it is good business sense to protect the environment.

Operator Training

Out existing plant operator is Timmy Arnett, Jr. Our back up operators are Andy Campbell and Scott Thompson. Both Timmy Arnett, Jr. and Scott Thompson have been trained by Mr. David Sloan, President and Andy Campbell, former plant operator. Their combined operation and familiarization of this plant exceed twenty years. They will continue to be directly involved in the training and hiring of any new plant operators.

Besides periodic reviewing of “plan” with plant operator(s), management also periodically reviews DEP Operation Permit with plant operator(s). Although every detail of operation permit is important, following details stand out:

1. Plant is permitted to operate at maximum hourly rate of 143TPH

2. Both, dryer burner and asphaltic heater, are allowed to use either No. 2 diesel fuel with maximum sulfur content of 0.5% or natural gas. Sulfur content in fuel oil must be determined using ASTM methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4-294-90.

3. Compliance tests will be conducted yearly.

4. Maximum hours of operation are 2000 hours/year. A log, documenting hours of operation shall be maintained.

5. Maximum yearly asphalt production is limited to 500,000 TPY.

6. Maximum fuel usage is limited to 1,200,000 gal/yr of No. 2 diesel/fuel.

Yearly training sessions are held to cover plant operation, safety, compliance with DEP Operation Permit and other environmental issues such as prevention of fugitive dust emissions and prevention of material spills throughout plant property.

Plant Monitoring

This section established the use of parameters to monitor plant operation such as pressure differentials and visible emissions. The Company conducts reasonable monitoring to assure continued compliance with the terms and conditions of the permit. Monitoring is carried out in the manner prescribed in this procedure.

The performance parameters include such physical, chemical or electrical characteristics as are applicable to this particular emissions unit and which are indicators of the condition, operation rates and efficiencies. Such parameters include the following:

Bag pressure drop
Exhaust air flow rate (established during EPA Method 5 compliance test)
Air to cloth ration
Bag weave
Bag material
Bag cleaning conditions
Pulsing sequence and air pressure

The operating protocol addresses the physical steps and procedures to be followed by the operator when monitored parameters are outside the typical operating range established for this facility since initial startup. Proper operation of baghouse dust collector is monitored by a magnehelic differential pressures gauge. Sudden decrease in pressure across filtering media (bags) represents a system leak. Sudden rise in pressure represents plugging problems. Magnehelic gauge indicates the pressure differential across the filter elements in inches of water.

All asphalt plants create particulate emissions while aggregate and sand are dried in a drum mixer. In order to meet Federal and State air quality codes, emission control equipment consisting of exhaust hood(s), ductwork, baghouse and exhaust blower is employed. As air laden with dust is captured at points of emissions, it is conveyed through a system of ductwork to baghouse which filters particulate from the air. Clean air is then exhausted by exhaust blower and released into atmosphere. During dust filtering operation, particulate matter is collected by filtering bags causing a reduction in dust emissions. In order to keep dust from building

up on filter bags, a cyclic timer periodically actuates the solenoid valves that deliver momentary surges of high-pressure air. These surges are discharged through orifices located above each bag causing a reverse flow of air through the bag for cleaning purposes. Cleaning (blowing) of bags is done in sequence controlled by a timer so that not all bags are blown at the same time. Instead, timer is sequenced to deliver bursts to one or several bags at one time. This assures that baghouse continues to operate uninterrupted without disrupting filtering process.

The operating parameters of the baghouse type pollution control equipment to be monitored are as follows:

Pressure drop (Delta P) across baghouse
Visible emissions

Pressure drop across the baghouse at this facility during normal operations and during emissions tests were observed at 1.75” – 3.25”WG.

A pressure drop lower than 1.25” WG could indicate:

New bags, which have not developed a filter cake
Bag failure
Baghouse or ductwork structural failure

A pressure drop higher than 5.25” could indicate:

Plugged bags or ductwork
Blocked stack
Fan malfunction

Operation and Maintenance Plan

Operation and Maintenance (O & M) Plan provides reasonable assurance that the facility can be effectively operated and maintained, through reasonable provisions of the operation and maintenance of the facility. Routine maintenance of equipment is performed as needed to assure optimal operation. The facility is operated to control objectionable odors in accordance with Rule 62-296.320(2), F.A.C. Fuels, solvents, lubricants and other maintenance materials are stored in approved areas.

The O & M Plan includes procedure for start-up, daily monitoring and inspection of the baghouse and dust collection system, weekly, monthly and annual maintenance required for the above.

Start-up of Baghouse

Start all electric drive components to ensure proper rotation.

Run air compressor to ensure proper air pressure is reached for cleaning cycle.

Run exhaust fan and check differential pressure magnehelic gauge.

Preheat baghouse to 250-300 F before aggregate is discharged into dryer. This should be done first thing in the morning and then again only after prolonged shutdowns during the day (30 minutes or more)

Minimum inlet temperature to baghouse should never be allowed to fall below 220 F or condensation may occur inside the baghouse causing bag mudding or blinding with a result of very high static pressures and loss of adequate draft for proper dryer operation.

At shutdown, always keep timer and augers operating after dryer shutdown to clean out baghouse. This will prevent a cold slug of dust from reaching the plant at next start-up. Also, the dust auger could be stalled if slugged with cold, wet dust.

Daily monitoring and checks of baghouse and auxiliary equipment

Record baghouse differential pressure reading. Differential pressure reading should read between 1.25 and 5.25 inches water gauge (WG).

If readings exceed 5.25" WG, operator needs to rectify the problem immediately by determining the reason for high reading and take corrective actions.

First determine that the gauge is not malfunctioning by performing the following:

Disconnect both lines leading to gauge and see if gauge reads "O". If not, use set screw to reset gauge to "O".

While lines are still disconnected, blow both lines with compressed air (pressures no higher than 30 PSAIG).

Reconnect lines and check reading.

If reading is still high, the problem is in the baghouse or ductwork as described in Plant Monitoring section.

If gauge reading is 1.25" WG or lower, check gauge as described above and if readings are still low, the problem is in the baghouse or ductwork as described in Plant Monitoring section.

Perform visual inspection of the plume from the baghouse stack. If at anytime a constant stream of dust is observed from fan stack, check for a mechanical leak or worn or torn bag(s). If a leak develops, the area can usually be easily spotted from the clean air side by a large deposit of dust around the leak area. Should a leak develop, clean dust from area and reseal both sides of leak with high temperature silicone sealant. Plant operator needs to know how to distinguish between vapor/moisture plume and actual opacity which represents dust in plume. Vapor will be present on cold days, when moisture in the plume is condensing.

Check baghouse pulsating system and determine if it functions correctly. Check baghouse dust hopper and auger conveying system to make sure it operates properly.

Record dryer burner start-up and shutdown times.

Record total production.

All above checks and data will be recorded on plant daily log. Sample of daily log attached.

Weekly maintenance

Apply grease to all grease fittings

Adjust belt tension(s)

Clean compressed air filter and water trap

Monthly maintenance

Blow out differential lines

Annual Maintenance

Shut down the plant's operation each year to conduct preventive maintenance procedures. This should include changing of bags in baghouse as needed and tuning maximum burner efficiency.

Facility Inspections

This section describes the use of periodic facility “walk through inspections” by plant staff with specific inspection guidelines.

Inspection of the baghouse and dust collection equipment, is conducted by a fully trained employee with direct access to senior management. Inspections are conducted weekly, monthly, semi-annually, and annually as follows:

Weekly

Check that hopper is empty

Monthly

Check access door seals for leaks
Check door seals for deterioration

Semi-annually

Check bag condition (dirty side)
Check fan
Check belt tension

Annually

Check case support for corrosion
Check all bolts and welds
Check ductwork for buildup of dust

Records

Following documents are on file and are available to DEP upon request:

Copy of current DEP construction and operations permit

Log(s) of daily recordings as listed in O & M Plan

Copy of fuel analysis stating percentage of sulfur

Fuel delivery slips indicating amount of fuel delivered during previous 12 months

Copy of this “plan”

Results of last compliance test

Periodic Plan Review

This “plan” is reviewed at least annually. This review includes evaluation of the effectiveness of the plan and incorporates changes necessary for the plan to be continuously administered.

The Operation Plan shall be updated as operations change but no less frequently than upon renewal of DEP Operations Permit. DEP shall be notified of changes to the Operation Plan other than those required for routine maintenance. The operation Plan shall be revised when operational procedures change. The Plan shall be revised to reflect any facility alterations performed or to reflect experience resulting from facility operation. Baxter Asphalt & Concrete, Inc. will periodically review and revise the operating protocol, as appropriate, to ensure satisfactory system performance.

Abnormal Events

In the event Baxter Asphalt & Concrete, Inc. is temporarily unable to comply with any of the conditions of their DEP permit due to breakdown of equipment, power outages, destruction by hazard or fire, wind, or other cause, they will notify DEP. Notification shall be made in person, by telephone, or by other means within 24 hours of breakdown or malfunction to the Pensacola office of Florida Department of Environmental Protection. Phone number (850) 595-8364, day or night.

A written report of any noncompliance referenced above shall be submitted to the Pensacola office of DEP (160 Governmental Center, Pensacola, FL 32501-5794) within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of problem and the time when facility will again be operating in accordance with permit conditions.

If an emergency arises or there is any condition, which prevents the continued operation of the emission control components or results in non-compliance with applicable regulations, the operator will:

Stop production immediately

Notify main office

Ensure that the emission control components are in good working order before resuming production