Environmental Compliance Plan

Group III Asphalt, Inc.
Milton, Florida Facility
7775008

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Introduction

This plan provides additional information demonstrating the owner's commitment to operating this facility in compliance with DEP Operation Permit requirements and sound environmental principles in general. The Plan also provides reasonable assurance that the continued operation of the facility will be in accord with applicable laws and rules.

The detail of the Plan is consistent with the complexity of the system. It was developed in accordance with the unique requirements of this facility and provides the operator with adequate information and description regarding the design, operation and maintenance features of the facility. It also contains information concerning process control and performance evaluation for the facility, as well as equipment and procedural descriptions (including any notification/report requirements of appropriate agencies) in case of abnormal events such as breakdown of equipment, destruction by hazard of fire, wind or other cases. Regular maintenance and repair instructions for plant equipment and monitoring procedures are also included.

Management Commitment

Group III Asphalt, Inc. adheres to a strong, facility-wide environmental program which was developed to ensure the highest commitment and quality from the business operation as well as from employees, to protect and enhance the environment.

Operator Training

This Plan represents continuing education program for all plant operators concerning plant operation, permit and other regulatory requirements. A copy of the approved Plan will be available to the operators, maintenance personnel, technicians, and laboratory personnel.

Personnel are trained to operate facility in accordance to factory training manual(s) and this Plan. Consequently, new employees will be trained within 90 days after commencement of employment and prior to unsupervised equipment operation.

Periodic training sessions are also intended to teach plant operators to address environmental issues.

Plant operators involved with the operation of process equipment and air emissions control devices are trained on how to recognize excessive opacity (smoke or dust) coming from exhaust stacks and/or vents of such devices. They do not need to be certified opacity readers but through experience gained by operating and observing such systems they are capable to recognize when emissions are excessive. No excessive smoke and/or dust or particulate matter should be observed (seen by a naked eye) from baghouse exhaust stack, asphaltic heater exhaust stack etc; also leaks of material from material conveyors, baghouse casing or filtrates from baghouse and conveying auger should not be present at anytime. Baghouse exhaust stack can emit excessive PM emissions (dust) during startup (warm up); such emissions should last a short time (less than 3 minutes). During normal operation no emissions (other than heat waves or vapor plumes) from baghouse or asphalt heater should be detected.

Operators are also trained to observe pressure drop gauge(s) placed across baghouse filtering media. They are familiar with normal ranges, observe gauge(s) and record readings daily. If readings are not within specified ranges, operators are trained to trouble shoot the gauge to determine if gauge is reading correctly. If gauge is not at fault and readings are still out of determined ranges, then emissions control device (baghouse) is at fault. Operators are trained to be able to interpret changes in gauge readings to the extent of recognizing that increase in pressure drop indicates that filters are "loading up" and shall need replacement soon. Low readings indicate that

filters are either installed incorrectly or integrity of filter has been compromised.

Plant Monitoring

This section establishes the use of parameters to monitor plant operation such as pressure differentials and visible emissions. Monitoring also includes recording of plant production based on daily and monthly basis and calculation of rolling 12-month totals. The monitoring will be carried out in the manner described:

Baghouse

The performance parameters include such physical, chemical or electrical characteristics as are applicable to particular baghouse. Such parameters generally include the following indicators:

Condition of filtering media
Differential pressure gauge reading
Presence of mist (opacity) exhaust stack

The pressure drop across filters is measured by pressure differential gauge is a useful parameter to monitor paint baghouse performance. Each baghouse operates within a certain pressure drop range.

A pressure drop much lower that the lower end of the operating range could indicate:

Exhaust fan not running
Filter media failure; holes in filter, or filter misalignment
Ductwork structural failure

A pressure drop much higher than the upper end of the operating range could indicate:

Plugged filters

Range of differential pressure reading for this baghouse is 1" to 6" W.G.

Operators are trained to inspect plant operation daily and to make sure all equipment is operating correctly, check for integrity of equipment such as leaks from holes in conveying belts, baghouse casing and especially in

equipment handling filtrates (fine dust) such as augering conveyors. He/she observes the operation of the baghouse making sure no opacities (dust) is being emitted from the baghouse blower stack; he also checks the operation of baghouse pressure drop gauge (magnehelic); he/she also inspects baghouse filtering media cleaning cycle to make sure it operates correctly. Checks of visible emissions and magnehelic gauge are recorded daily on attached form.

Additionally DEP Operation Permit requires annual visible emissions testing according to EPA Methods 1-5 & 9, to determine compliance with DEP rules. Each such annual testing event provides an opportunity to evaluate a possible correlation between filtering media pressure drop and exhaust air opacity.

Material Monitoring

Recording of concrete asphalt produced is done daily together with hours plant operated. From this record, average hourly production rate is calculated. Plant is permitted to operate at maximum production rate of 300 TPH.

At the beginning of each month, summary of concrete asphalt production is calculated together with rolling 12-month total. Total should never exceed 500,000 TPY.

Records of fuel purchases are kept and summarized each month. Again 12-month total is calculated and total should never exceed 1.2 MM gallons.

Operation and Maintenance Plan

This section establishes a plant specific Operations and Maintenance (O & M) Plan. This element provides reasonable assurance that this facility can be effectively operated and maintained, through reasonable provisions for the operation and maintenance of the facility. Routine maintenance of equipment will be performed as needed to assure optimal operation. The facility shall be operated to control objectionable odors in accordance with Rule 62-296.320(2), F.A.C. Fuels, solvents, lubricants and other maintenance materials shall be stored in approved areas.

This plan includes startup and shutdown of the baghouse and a schedule for the maintenance. The Operation and Maintenance Plan includes identification of the control device (baghouse), including the following design specifications and other descriptive data:

Manufacturer: Terex Corporation
Model number: E3 300 P
Type: Reverse Air Flow
Flow rate (gas): as tested 10/08, average 41,450 ACFM
Efficiency rating at design capacity: 99.9%
Pressure drop: 1-6" W.G.

The Plan also includes performance parameters that indicate the rate of operation, process production rate and fuel description. Such parameters include the following:

Weight per unit time of asphalt concrete produced in: 300 TPH
Fuel or fuel mixture: No. 2, or No. 4 fuel oil or on-spec used oil with max. sulfur content of 0.8%.

Startup of baghouse:

Start all electric drive components to ensure proper rotation

Check and make sure that cleaning of filtering system is operating

Check and make sure that filtrates removal system from baghouse hopper is operating properly.

Run exhaust fan and check to see that magnehelic gauge lines are hooked up correctly.

Start rotation of drum-mix dryer

Light the burner and bring entire system to operating temperature(s) before introducing raw materials (aggregate and liquid asphalt)

Shutdown of baghouse

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.

Routine maintenance includes:

WEEKLY

Apply grease to all grease fittings

Adjust all belt tensions

MONTHLY

Blow out differential pressure gauge lines

ANNUALLY

Shut down the plant's operations each year to conduct preventive maintenance procedures

These preventive maintenance procedures include changing the bags in the baghouse as needed and turning the burner for maximum burner efficiency as needed.

Records

Records of inspections, maintenance and performance data of control devices and auxiliary equipment shall be retained for a minimum of five years and shall be made available to DEP upon request. These records are retained at the plant office.

Records that should be kept regularly include baghouse pressure drop. Recordings are maintained to be used in comparison to current baghouse data.

Records requirements shall include:

Production records

Fuel(s) purchase record

Analyses of fuels purchased

Records of control equipment operating parameters

Records of control system malfunctions or failures and corrective actions taken

Results of compliance tests required by DEP shall be reported to DEP within 45 days after completion of the test.

Periodic Plan Review

This plan will be reviewed at least annually from date of approval. This review will evaluate the effectiveness of the Plan and will make any changes necessary for the Plan to be continuously administered.

The Environmental Compliance Plan shall be updated as operations change, but no less frequently than upon renewal of permit. DEP shall be notified of changes to this plan other than those required for routine maintenance. The Environmental Compliance Plan shall be revised when operational procedures change, to reflect any facility alterations performed or to reflect experience resulting from facility operation. The Company will periodically review and revise the operating protocol, as appropriate, to ensure satisfactory system performance.

ABNORMAL EVENTS

In the event the Company is temporarily unable to comply with any of the conditions of DEP permit due to breakdown of equipment, power outages, and destruction by hazard of fire, wind or other causes, the Company will notify DEP. Notification shall be made in person, by telephone, or other means within 24 hours of the breakdown or malfunction. The telephone number to call to notify DEP is **(850) 595-8300.** For emergencies involving a significant threat to human health or the environment, the number is **(850) 320-0519.**

A written report of any noncompliance referenced above shall be submitted to the Florida Department of Environmental Protection, **160 West Government Street,** Pensacola Fl. 32502-5794, within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction the steps being taken or planned to be taken to correct the problem and prevent it's reoccurrence, emergency procedures in use pending correction of the problem and 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 emissions control components or results in non-compliance with applicable regulations, the operator will:

Stop production immediately

Notify Area Superintendent(s), as soon as practically possible, of the time, date, and Nature of the occurrence and the corrective action(s) taken

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

Group III Asphalt, Inc.
Milton Plant

Daily Log

Date: _____

Tons Mixed: _____

Hours Operated: _____

Average tons/hr (tons/hours): _____

Daily Checks

Magnehelic Reading: _____"W.G.

Stack Visible Emissions Present: _____yes _____no

Reverse Airflow system operating. _____yes _____no

Baghouse filtrates conveying system operating:: _____ yes _____ no

_____ _____
(date) (Plant Manager)