TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

V.E. Whitehurst & Sons, Inc.
20551 NE 75th Street
Williston, Florida 32696

Facility ID No. 0010037

PROJECT

Project No. 0010037-011-AC
Application for Air Construction Permit

COUNTY

Alachua, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Northeast District Office
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

September 06, 2011

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: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

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 categories. 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. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

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.

Project Description and Location

The facility is located in Alachua County at 2330 NW 73rd Place in the City of Gainesville.
The unit is a Recycled Asphalt Pavement Crushing System (Standard Industrial Classification No. is 2951), used to crush RAP into a smaller size to be reused in the manufacture of new Hot Mix Asphalt.

The applicant has proposed the after the fact construction of an Astec Valu-King shaker screen, model No. 5X16 DD for the existing Recycled Asphalt Pavement (RAP) Crusher system.

The after the fact shaker screen (ep 05) is subject to 40 CFR 60.675(b)(2), 40 CFR 60, Subpart OOO.

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility is not a major source of air pollutants, other than HAPs.
- The facility has no 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 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.

Processing Schedule

July 14, 2011 Application received for an Air Construction Permit.

2. APPLICATION REVIEW

Discussion of Emissions

Based on a maximum authorized operating rate of 130 tons/hour, at 1300 hours per 12 consecutive months; the estimated potential emissions from the RAP Crusher are stated in the table below:

Potential to Emit (PTE) Estimation

Pollutant	Emissions Rate (Lbs/hr.)	Emissions Rate (tons/year)
Particulate Matter (PM)	10.32	6.70
Particulate Matter (PM 10)	3.72	2.42

Emissions factor source AP 42, Table 11.19.2-2

The RAP System is capable of being powered by a 300 HP Caterpillar Industrial Diesel Engine, (serial No. 49B1502) or separate electric power.
Application No. 0010047-011 received 07/14/11 states that the diesel motor and generators have been removed from the facility. However for flexibility the facility would like to maintain the conditions of the permit as is.
The engine is authorized to operate for 1300 hrs per 12 consecutive months. Maximum fuel oil consumption shall not exceed 12 gallons per hour and 15,600 gallons in any 12 consecutive month period at a maximum sulfur content of 0.5% by weight.

The diesel engine is not subject to NSPS, Subpart IIII--Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

The estimated potential emissions from the diesel engine are stated in the table below. The emissions data are obtained from AP 42, Table 3.1-1.

Pollutant	Emissions Factor (lbs/mmbtu)	Emissions Rate (ton/year)
Carbon Monoxide (CO)	0.95	1.01
Sulfur Dioxide (SO2)	0.29	0.31
Nitrogen Oxide (NOx)	4.41	4.70
VOC	0.36	0.38

The facility is synthetically limited due to sulfur content and hours of operation limitation.

Federal NSPS Provisions

The after the fact shaker screen (ep 05) is subject to 40 CFR 60.675(b)(2), 40 CFR 60, Subpart OOO

Federal NESHAP Provisions

The unit is not subjected to any requirements of Federal NESHAP Provisions.

State Specific Requirements

The unit is subject to Florida Administrative Code (F.A.C) Rule Rule 62-296.320(4)(b) F.A.C General Visible emissions.

3. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft 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 draft permit. Yasmin K. Enriquez 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 Northeast District Office Air Program, 7825 Baymeadows Way, Suite B200, Jacksonville, Florida 32256-7590.