Florida Department of

Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando Sarasua, P.E.
FROM: Teresa Knepper, P.E.
DATE: March 28, 2011
SUBJECT: Evaluation Summary for Triangle Construction Road Building, Inc.
0050038-004-AO, Bay County

We recommend issuing a renewal permit to Triangle Construction Road Building, Inc., to operate their asphalt concrete plant facility. This permit follows 0050038-003-AO, effective November 29, 2005.

Process Description.
The emissions unit consists of a Barber Green Model BE-33 batch mix asphalt concrete plant with a design capacity of 120 tons per hour of asphalt mix. The plant includes a rotary dryer for drying and heating the aggregate, a hot aggregate elevator, screens, bins, weigh hopper, asphalt cement heater, mixer (for combining the aggregate and asphalt cement) and a truck loading chute.

The facility is regulated under NSPS, 40 CFR 60 subpart I (Standards of Performance for Hot Mix Asphalt Facilities).

Pollution Control Equipment.
Particulate emissions are controlled by a Dustex baghouse, Model DW-14-28W, with an air-to-cloth ratio of 7.3:1 and 392 Nomex bags. Sulfur dioxide emissions are controlled by burning either natural gas or fuel oil with a maximum sulfur content of 0.5%.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	62-210.300(3)(c)2.	6.5	3.25	.04 gr/dscf	N/A
SO2	N/A	26	13	N/A	N/A
VOC	N/A	4	2	N/A	N/A
NOx	N/A	14	7	N/A	N/A
CO	N/A	48	24	N/A	N/A
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	62-210.300(3)(c)2. And 62-297.620(4)	N/A	N/A	Not more than 5% opacity	
HAP's	N/A	0.9	0.45	NA	

Applicable Rules & Regulations. This source is regulated in accordance with NSPS 40 CFR 60 subpart I, incorporated by reference in Rule 62-210(300)(c)2., F.A.C. (Conditional Exemption from Title V Permitting). The original construction permit limited production to 120 TPH and 1,000 hours per year. This permit retains the 120 TPH and 120,000 ton per year limits, but eliminates the 1,000 hour per year limit to allow for increased production flexibility without increasing emissions. This permit also allows

natural gas to be used as an alternative to fuel oil to increase operational flexibility and potentially reduce SO2 emissions.

Visible emissions are limited to 5% opacity in lieu of annual particulate testing as allowed by Rule 62-297.620(4), F.A.C. (Exceptions and Approval of Alternate Procedures and Requirements). The applicant petitioned for this exception and it was granted and incorporated in 0050038-002-AO issued in January of 2001.

Compliance Monitoring.
This permit requires an annual VE test and a particulate emissions test once per permit cycle.

Compliance History.
From 2005-2010, all compliance inspection results have been "in compliance." There were two instances where source test reports were submitted late. The test report completed 11/9/05 was not submitted until 9/28/06 and the reason given was that the office manager had retired and it was left on his desk. The test report conducted 9/3/09 was not received until 7/30/2010 and the reason given was that the consultant had e-mailed it to the Department the day after the test but did not request confirmation of receipt. The last test report conducted 9/8/2010 was received by the Department on 10/14/2010, within the required 45-day time frame.

Fee Summary. This is an AO2A ($1,500 fee) minor source with a stack test. The original construction permit fee was $250.00 for an AC1D facility (source less than 50 TPY).

TK/c