



**TECHNICAL EVALUATION  
&  
PRELIMINARY DETERMINATION**

**APPLICANT**

Good IV – TKLC, Inc. dba WWG Asphalt  
P.O. Box 560559  
Rockledge, FL 32956-0366

Asphalt Batch Plant No. 1

Facility ID No. 0090015

**PROJECT**

Project No. 0090015-006-AO  
Application for Synthetic Minor Source Air Operation Permit Renewal  
Project Name: Asphalt Plant Permit Renewal

**COUNTY**

Brevard County, Florida

**PERMITTING AUTHORITY**

Florida Department of Environmental Protection  
Waste and Air Resource Programs  
Central District Office  
Orlando, Florida 32803-3767  
DEP\_CD@dep.state.fl.us

April 30, 2013

Prepared by Jeff Rustin, P.E.

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### 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.

- I. Project Description:
  - A. Applicant:  
Chris Brunais, Senior Plant Manager  
Good IV – TKLC  
P.O. Box 560559  
[wwgasphalt@bellsouth.net](mailto:wwgasphalt@bellsouth.net)
  - B. Professional Engineer: N/A
  - C. Application Contact:  
Sara Greivell, Project Manager  
Grove Scientific & Engineering Company  
6140 Edgewater Drive, Suite F  
Orlando, FL 32810  
[sara@grovescientific.com](mailto:sara@grovescientific.com)

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D. Project Location:

5020 Nova Avenue  
Rockledge, Florida 32955

E. Project Summary:

This project renews Permit No. 0090015-005-AO. The particulate air emission limitation was changed to meet the particulate air emission limitation of 40 CFR 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities. The testing frequency was changed to meet the testing frequency requirement of 40 CFR 60, Subpart A, General Provisions.

F. Application Information:

Application Received on: 02/19/2013  
Fee was Received on: 03/06/2013  
Application Complete: 04/03/2013 - Emission limitation phone call discussion between Sara Greivell and Jeff Rustin

II. PSD Applicability for Project

No increase in air emissions; therefore, this project is not subject to PSD preconstruction review.

III. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes, and Chapters 62-204 through 62-297, F.A.C., as indicated below.

<b>Subject to:</b>	<b>Y/N</b>	<b>Comments</b>
<b>Rule 62-212.400, F.A.C.</b> - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
<b>Rule 62-296.320(4), F.A.C.</b> - General Particulate Emission Limiting Standards	Y	The facility is a potential source of unconfined particulate matter emissions.
<b>Rules 62-296.320(1) and (2), F.A.C.</b> - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	The facility is a potential source of VOCs and odor.
<b>Rule 62-296.500, F.A.C.</b> - Reasonably Available Control Technology (VOC)	N	Brevard County is an attainment area for ozone.

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Subject to:	Y/N	Comments
<b>Rule 62-204.800(8), F.A.C.</b> - Standards of Performance for New Stationary Sources (NSPS– 40 CFR 60)	Y	<ul style="list-style-type: none"> <li>• EU Nos. 001 is subject to 40 CFR 60, Subpart A, where applicable.</li> <li>• EU No. 001 is subject to 40 CFR 60, Subpart I.</li> </ul>
<b>Rule 62-204.800(11), F.A.C.</b> National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	There is no applicable source category.
<b>Chapter 62-213, F.A.C.</b> - Operation Permits for Major Sources of Air Pollution	N	Facility is a synthetic minor source.
<b>Rule 62-297.310, F.A.C.</b> – General Compliance Test Requirements	Y	EU No. 001 - VE and PM testing required.

#### IV. Summary of Emissions

Pollutant	EU No. and brief description	Actual Emissions * (tons/year)	Actual Emissions ** (tons/year)
PM	EU 001- drum mix asphalt plant	0.606159	0.621656
PM <sub>10</sub>	EU 001- drum mix asphalt plant	0.102784	0.105411
VOC	EU 001- drum mix asphalt plant	0.843352	0.864912
NO <sub>x</sub>	EU 001- drum mix asphalt plant	0.685224	0.702741
SO <sub>2</sub>	EU 001- drum mix asphalt plant	0.089606	0.091897
CO	EU 001- drum mix asphalt plant	3.42612	3.513710
HAPs	EU 001- drum mix asphalt plant	0.13968	0.143251

\* based on AOR for calendar year 2012.

\*\* based on AOR for calendar year 2011.

I reviewed the February 13, 2013 stack test results, which were satisfactory; the AOR data for calendar years 2012 and 2011; and the previous permit, Permit No. 0090015-005-AO. The facility was in compliance with the particulate and visible emission limitations of the permit and 40 CFR 60, Subpart I.

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### V. Federal NSPS and/or NESHAP Provisions

A. NSPS, 40 CFR 60 Subpart A, General Provisions

B. NSPS, 40 CFR 60 Subpart I, Standards of Performance for Hot Mix Asphalt Facilities

### VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed final permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

### VII. 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. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, Waste & Air Resource Programs, Central District Office, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767, by e-mail at [jeff.rustin@dep.state.fl.us](mailto:jeff.rustin@dep.state.fl.us) or by phone at 407-897-4100.