Memorandum

Florida Department of Environmental Protection

TO: J. Charles Harp
Program Administrator
Waste Management/Air Resources

THROUGH: Armando I. Sarasua, P.E.
Air Permitting Supervisor

FROM: Howard Ard
Permit Engineer

DATE: December 9, 2014

SUBJECT: Evaluation Summary for C. W. Roberts Contracting, Inc.; Tallahassee Asphalt Plant, Permit No. 7770100-008-AO, Leon County

We recommend issuing a permit to C. W. Roberts Contracting, Inc. to operate their Tallahassee Asphalt Plant. This is a renewal of air operation permit No. 7770100-006-AO, effective February 15, 2010.

Changes Since Last Permit Renewal.
This renewal permit includes natural gas as a permitted fuel for this facility. The use of natural gas was authorized by permit No. 7770100-007-AO, minor modification to permit No. 7770100-006-AO, effective May 23, 2012.

Process Description.
This facility is a relocatable, drum mix, asphalt concrete plant, CMI Model PTD-400, with an operating capacity of 400 tons of asphalt mix per hour. The plant was constructed May 4, 1999 under permit No.7770100-001-AC. The asphalt plant consists of a material and recycle feed system, drum mixer, asphalt cement/GTR storage tank, asphalt cement heater, hot asphalt storage silos and truck loadout. The facility also has a 25,000-gallon CMI, Model MFS-900P00-103, mineral filler silo with a pulse jet baghouse, Model 72AVS16. Particulate matter emissions from the plant are controlled by a CMI Roto-Aire baghouse, Model RA318. Fines from the baghouse are recycled into the asphalt mix. Liquid asphalt and RAP are added midway down the drum, and the mixed asphalt concrete is conveyed through a batcher to a storage bin and loaded into trucks.

The facility is permitted to burn natural gas or fuel oil with a maximum sulfur content of 1.0 percent or less, by weight.

A portable recycled asphalt pavement (RAP) crushing unit, with a current air general permit, will be operated at the facility periodically to provide RAP for the asphalt mix.

Pollution Control Equipment.
Particulate matter emissions from the asphalt plant and mineral filler silo are controlled by baghouses.

Environmental Impact (tons/year).

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions*	Allowable Emissions
PM	62-210.300(3)(c)2.d.	10.5	0.04 gr/dscf
SO_2	62-210.300(3)(c)2.	81.8	<100
VOC	N/A	2.1	<100
NOx	N/A	30.0	<100
CO	N/A	95.0	<100
Objectionable Odors	62-296.320(2)	N/A	None allowed off plant property
VE	62-210.300(3)(c)2.f.	N/A	Not more than 20% opacity

Emissions estimates are based on the burning of fuel oil with sulfur content of 1%, by weight.

Applicable Rules & Regulations. The source is regulated by 40 CFR 60 Subpart I, Standards of Performance for Hot Mix Asphalt Facilities, and Rule 62-210.300(3)(c)2., F.A.C., Conditional Exemptions from Title V Permitting. Annual throughput of asphalt concrete mix is limited to 500,000 tons per year. Fuel oil consumption is limited to 1.2 million gallons in any consecutive 12-month period, and the sulfur content of the fuel oil is limited to 1.0%, by weight. The asphalt cement heater is exempt from permitting by Rule 62-210.300(3)(b)1., F.A.C.

Compliance Monitoring. Annual compliance tests for PM and VE are required. Records of fuel oil consumption and production of asphalt shall be maintained. Environmental Compliance Plan is required.

Compliance History. Records search shows facility to be in compliance for the past five years.

Fee Summary. This is an AO2A ($1,500 fee) minor source with a stack test.

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