



## Florida Department of Environmental Protection

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### Memorandum

**TO:** Rick Bradburn  
**THROUGH:** Armando I. Sarasua, P.E.  
**FROM:** Howard Ard  
**DATE:** August 13, 2012  
**SUBJECT:** Evaluation Summary for APAC Mid-South, Inc., Freeport Plant No. 04026, 7770142-012-AO, Walton County

We recommend issuing a permit renewal to APAC Mid-South, Inc. to operate Freeport Plant No. 04026. This permit follows Permit 7770142-010-AO, effective December 19, 2006. This facility was previously owned by APAC-Southeast, Inc., Gulf Coast Division and known as the Freeport Plant 408. Outstanding air construction permit 777040-011-AC, effective November 30, 2009 and expiration date November 30, 2014, authorizes the use of Biomass fuel oil in the asphalt plant dryer. However, this facility had neither used nor tested Biomass fuel oil by the time this permit renewal application was received; therefore, biomass fuel oil is not included in this permit.

The plant is temporarily idle and has not operated since March 2010. However, the Permittee has elected to renew the permit for this facility and has submitted a non-Title V permit renewal application, received July 5, 2012, to renew Permit 7770142-010-AO, which expired October 20, 2011. The Department waived the requirement to obtain an air construction permit as the applicant certified there have been no changes to the facility which has been idle due to poor economic conditions.

Process Description: This facility consists of a portable double barrel counter flow drum mix asphalt plant with a design capacity of 270 tons of asphalt concrete mix produced per hour. The facility is permitted to burn fuel oil, on-specification used oil and natural gas. The plant has a maximum recycled asphalt pavement (RAP) usage of 50% for the product mix. A relocatable RAP crushing system, under an Air General Permit, may be operated at the facility periodically to provide RAP for the asphalt mix.

Pollution Control Equipment: Particulate emissions from the plant are controlled by a-baghouse. Baghouse fines are recycled into the asphalt mix. Asphalt production is limited to 500,000 tons per year. Sulfur dioxide emissions are controlled by limiting facility fuel oil consumption and oil sulfur content.

Environmental Impact:

Airborne Contaminant Emitted	Emission Factors (Fuel oil)	F.A.C. Rule	Estimated Emissions (Production 250 TPH and 500,000 T/yr)		Synthetic Minor Emissions (Fuel oil 1.2MMGPY; Production 500,000 T/yr)
	lbs/ton		lbs/hr	T/yr	Allowable (Tons/year)
PM <sub>total</sub>	0.033 <sup>a</sup>	62-210.300(3)(c)2.d.	8.6	8.6	0.04 grains/dscf
SO <sub>2</sub>	0.058 <sup>b</sup>	62-210.300(3)(c)2.c.	56.7	63.5	<100
VOC	0.032 <sup>c</sup>	N/A	N/A	8.0	<100
NO <sub>x</sub>	0.055 <sup>b</sup>	N/A	N/A	13.8	<100
CO	0.13 <sup>b</sup>	N/A	N/A	32.5	<100
Objectionable Odors		62-296.320(2)	N/A	N/A	None allowed off plant property
VE		62-210.300(3)(c)2.f.	N/A	N/A	Not more than 20% opacity

a. Emission Factor for PM<sub>total</sub> from AP-42 Table 11.1-3 (Baghouse with fabric filter).

b. Emission Factors for SO<sub>2</sub>, NO<sub>x</sub> and CO from AP-42 Table 11.1-7. (Fifty percent of fuel-bound sulfur retained in product, remainder emitted as SO<sub>2</sub>).

c. Emission Factor for VOC from AP-42 Table 11.1-8.

Applicable Rules & Regulations: This source is regulated in accordance with NSPS, 40 CFR 60 subpart I (Standards of Performance for Hot Mix Asphalt Facilities) and Rule 62-210.300(3)(c)2., F.A.C. by having annual throughput limited to 500,000 tons of asphalt concrete per year, the fuel oil consumption limited to 1.2 million gallons in any consecutive twelve-month period and the sulfur content of the fuel oil to not exceed 1.0 percent, by weight. To ensure that the facility remains a non-Title V facility, the facility-wide fuel limits also include the periodically operated portable RAP crushing system.

Compliance Monitoring: The facility must conduct annual particulate matter and visible emissions testing to provide proof of compliance with 40 CFR 60 subpart I (PM limited at 0.04 grains/dscfm), and 62-210.300(3)(c)2.f., F.A.C. (VE < 20% opacity). The facility must also maintain records to prove compliance with fuel usage, oil sulfur content, and asphalt concrete production limits. The portable RAP crushing system will conduct VE testing in accordance with its current Air General (AG) Permit requirements.

Compliance History: VE and PM tests have been consistently within permitted limits. File review shows one record of non-compliance within the last five years. Failure to submit a test report, for the federal fiscal year 2009 emissions test to the Department within the 45 day timeframe as required, resulted in a letter of minor non-compliance being issued on February 12, 2010. No further action was taken. The annual emissions test was conducted July 29, 2009 and received by the Department January 28, 2010.

Fee Summary: This is a Type AO 2A minor source with stack test. Correct fee of \$1,500.00 was submitted.

HA/c