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: June 30, 2014

SUBJECT: Evaluation Summary for C. W. Roberts Contracting, Inc.; Hosford Asphalt Plant, permit No. 7774811-008-AO, Liberty County

We recommend issuing a permit to C. W. Roberts Contracting, Inc. to operate their Hosford Asphalt Plant. This is a renewal of air operation permit No. 7774811-007-AO, effective August 25, 2009.

Process Description.
This facility is a relocatable asphalt concrete plant constructed March 15, 1994 under construction permit AC20- 242835. The drum mix asphalt plant is a CMI, Model PTD-400, with an operating capacity of 250 tons of asphalt mix per hour. The facility has a material and recycle feed system, a drum mixer, asphalt cement/ground tire rubber (GTR) storage tank, portable lime silo, heater, and a hot mix asphalt storage silo and truck loadout. Particulate emissions from the drum mixer are ducted to the baghouse. The fines from the baghouse are recycled into the asphalt mix.

A slinger conveyor transfers cold aggregate from four feeder bins to the burner end of the drum mixer. RAP and asphalt cement/GTR are transferred from a recycle bin and storage tank to the mid-section of the drum mixer at a maximum RAP usage rate of 35% of the operating rate. Heated asphalt cement is injected at the discharge end of the drum mixer, and a drag conveyer transfers mixed asphalt concrete to storage and loading silos. Fugitive emissions at the facility result from uncontrolled process emissions, aggregate stockpiles, and vehicular traffic.

Both the asphalt storage and asphalt cement/GTR storage tanks are heated by the asphalt heater. Additionally, the mineral filler silo is exempt from permitting in accordance with Rule 62-210.300(3)(b)1, F.A.C.

The facility is regulated under NSPS, 40CFR Part 60, subpart I (Standards of Performance for Hot Mix Asphalt Facilities, provided the facility was built or last modified on or after June 11, 1973) and Rule 62-210.300(3)(c)2., F.A.C. (Conditional Exemptions from Title V Permitting). The facility is a synthetic minor source with annual throughput limited to 500,000 tons of asphalt concrete per year. The fuel oil consumption for the asphalt concrete plant (dryer and asphalt heater) and portable RAP crusher is limited to 1.2 million gallons in any consecutive twelve-month period and the sulfur content of the fuel oil shall not exceed 1.0 percent, by weight.

The facility is permitted to burn natural gas, fuel oil or on-specification used oil with a maximum sulfur content of 1.0 percent or less, by weight. On-specification used oil is defined as used oil that meets the specifications of 40CFR Part 279 - Standards for the Management of Used Oil.

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

Changes Since Last Permit Renewal - Natural gas is added as a permitted fuel for this facility. An air construction application was submitted with the renewal application, requesting the addition of natural gas as a permitted fuel. No permitting action is required because emissions are expected to decrease as a result of the addition of this new fuel. An emissions unit was added for the RAP crushing unit.

Pollution Control Equipment.
Particulate emissions are controlled by a Roto-Aire model RA3-18P/128 baghouse.

Environmental Impact (tons/year).

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions	Allowable Emissions
PM	62-210.300(3)(c)2.d.	10.7	0.04 gr/dscf
SO_2	62-210.300(3)(c)2.	81.8	<100
VOC	N/A	8.0	<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

Applicable Rules & Regulations. The source is regulated under 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. The facility is a synthetic minor source with annual throughput limited to 500,000 tons of asphalt concrete per year. The facility oil consumption is limited to 1.2 million gallons in any consecutive 12-month period, and the sulfur content of the fuel oil shall not exceed 1.0%, by weight. Application of Rule 62-210.300(3)(c)2.a. - j., F.A.C. allows the facility to be conditionally exempt from Title V permitting.

Compliance Monitoring. Annual compliance testing for PM and VE is required; and records of oil consumption and production of asphalt shall be maintained. Operation and Maintenance Plan is required.

Compliance History. Records search shows facility to be in compliance for the past five years, with one exception. A minor non-compliance was entered on 07/28/2011 for failure to have proper stack sampling facilities installed. A warning letter was issued 09/12/2011, an enforcement meeting with was held on 09/16/2011, the facility was found to be in compliance, and the case was closed without formal enforcement action on 10/19/2011.

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

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