TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Better Roads, Inc.
P.O. Box 9979
Naples, Florida 34101

Asphalt Plant #4
Facility ID No. 7774818

PROJECT

Project No. 7774818-009-AC
Application for Minor Source Air Construction Permit
In-Process RAP Crusher/Heater Replacement

COUNTY

Collier, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
South District Office
2295 Victoria Avenue
P.O. Box 2549
Fort Myers, Florida 33902

December 23, 2010

1. 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.

Facility Description and Location

Better Roads, Inc. is an existing asphalt plant, which is categorized under Standard Industrial Classification Code No. 2591. The facility is located in Collier County at 9220 Collier Blvd. in Naples, Florida. The UTM coordinates of the existing facility are Zone 17, 432.50 km East, and 2889.70 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

This project authorizes the installation of an in-process recycled asphalt pavement (RAP) crusher and the replacement of the liquid asphalt heating system at Asphalt Plant#4. These process equipments are part of the asphalt plant, emission unit (EU) 001. This project will also remove the following emission unit designations as they are integral activities to the asphalt plant and have been determined to be included in EU001, the asphalt plant: EU003 (emissions from conveyor drop points/aggregate handling and unpaved roads), EU004 (Hy-Way Hot Oil Heating System), and EU005 (Heatec Inc. model HCF direct fired liquid asphalt heating system). EU003, EU004 and EU005 have the potential for insignificant emissions and have no specific rule applicability. This project adds an emission unit (EU002) for a relocatable crusher to be operated at the facility. The crusher was previously authorized to operate at the facility under permit no. 7774818-007-AC. The asphalt plant EU001 is subject to Title 40 Code of Federal Regulations Part 60, Subpart I, Standards of Performance for Hot Mix Asphalt Plants.

Processing Schedule

October 14, 2010 Received the application for a minor source air pollution construction permit; application complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

This facility is not subject to PSD.

3. APPLICATION REVIEW

Discussion of Emissions

The asphalt plant has the potential to emit PM and VE. The emissions limitations are set forth in Rule 62-210.300(3)(c)2, F.A.C. and 40 CFR 60 Subpart I.

The facility is authorized to operate a re-locatable crusher on site per the requirements stated in this permit. The crusher was authorized under permit 7774818-007-AC. The re-locatable crusher must have a current general permit.

a. *Particulate Matter*. PM emissions shall not exceed 0.04 gr/dscf averaged over a three hour period. [Permit No. 7774818-009-AC; Rule 62-210.300(3)(c)2.d., F.A.C.]
b. *Visible Emissions*. VE shall not be equal to or greater than 20 percent opacity. [Permit No. 7774818-009-AC; Rules 62-210.300(3)(c)2.f., F.A.C]
c. *Fugitive PM*. Fugitive PM emissions shall be controlled in accordance with Rule 62-296.320(4)(c), F.A.C. [Rule 62-210.300(3)(c)2.e., F.A.C.; Permit No. 7774818-009-AC]
d. Potential to Emit. The plant (EU001) has the potential to emit the following, (**identified for information purposes only, and does not represent emission limitations.**) *Note: this does not include the in-process RAP crusher or relocatable crusher (EU002)*:

Pollutant	Tons Per Year (TPY)
PM	8.3
PM10	-
SO2	14.5
NOx	13.8
CO	32.5
VOC	8.0

State Requirements

The asphalt plant qualifies for the conditional exemptions from Title V air permitting as long as it demonstrates continual compliance with Rule 62-210.300(3)(c)2, conditional exemption requirements for facilities comprising asphalt concrete plants. The State emissions limitations and testing requirements are the same as the Federal NSPS Provisions.

Federal NSPS Provisions

40 CFR 60 Subpart I is applicable to the asphalt plant. The asphalt plant and all previous completed asphalt plant modifications have met the initial performance testing required by Subpart I. Any future asphalt plant modifications to the facility will need to conduct initial performance testing again. The facility is subject to the PM and VE emission limitations and testing requirements of Subpart I.

4. 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. Susan Machinski is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Permitting Authority's South District Office at 2295 Victoria Avenue, Suite 364, Fort Myers, Florida 33902.