OPERATIONS, MAINTENANCE AND POLLUTION PREVENTION PLAN

Revised 3/1/11

Introduction

This plan outlines the procedures that Anderson Columbia Co., Inc. (ACCI) incorporates during the normal operation of this facility. Adherence to this plan should provide the necessary assurance that this facility will be operated in compliance with the applicable rules of Florida.

This plan discusses the following components:

1. Corporate Commitment to the Environmental Rules.
2. Employee Training.
3. Preventive Maintenance Plan for Control Equipment
4. Facility Inspections.
5. Testing.
6. Records.

Corporate Commitment

A. Environmental Philosophy.

ACCI is committed to conducting business in a manner conducive to promoting the welfare of the environment. This commitment is consistent with our corporate objectives and is essential to sustainable business success. Our goal is to produce products and perform projects in an environmentally responsible manner. To achieve this goal, we have established the following environmental philosophy. All management employees are required to support this philosophy in accordance with their roles and responsibilities in the organization and to ensure that all employees understand and adhere to the philosophy.

- We design our product manufacturing facilities to meet all air and water regulations and maximize the use of recycled products to the extent possible while maintaining environmental quality and compliance.

- We conduct our operations in a manner that prevents pollution, conserves resources and proactively addresses past environmental problems.

- We integrate environmental management into our business and decision-making processes, and regularly measure our performance.

- We ensure our operations comply with environmental regulations and requirements.

- We provide clear and candid environmental information about our operations to regulatory bodies.

- We inform suppliers of our environmental requirements and encourage them to adopt sound environmental management practices.

- We foster environmental responsibility among our employees.

- We contribute constructively to environmental public policy.

Employee Training

All permanent employees receive site-specific environmental training while working at a facility. Fundamental environmental issues (i.e. keeping the job site clean, preventing spillage of hydrocarbons, job site storage of petroleum/chemicals) are reinforced by the plant operator during weekly safety meeting. If isolated areas are observed that fail to meet the objectives, individual training with those employees is pursued. Training includes the following:

- Requirements of the permits: Key employees are instructed as to what is required from the Company and how we are to achieve these requirements. The Company has incorporated a bound record keeping system, which is filled out by the Plant Operator daily. Included in these records are the requirements within the permit.

- Good housekeeping procedures: General good housekeeping practices are emphasized, including prompt cleanup of any spilled or leaked material, proper storage of material, and appropriate disposal of trash and waste around the facility. Housekeeping and spill incidences (see below) are logged on our inspection forms.

- Spill response procedures: Contingency measures are discussed to ensure against accidental discharge. Areas of potential spillage, such as the fuel truck off-loading area, are discussed with emphasis placed on response measures and the reporting requirements if such a spill does occur.

- Regulatory Issues: Identification of changes in permits and regulatory laws are communicated promptly.

Preventive Maintenance Plan For Control Equipment (Asphalt Plant)

The following observations, checks and operations shall be conducted on the schedule specified. These checks are in addition to the recording of performance parameters. A copy of this plan will be made and used as a checklist to document each inspection. Any deficiencies will be documented and follow-up corrective actions will be done.

A. Daily

1. Observe baghouse stack (visual). The presence of any visible emissions from the stack is an indication that there is a malfunction in the baghouse and that the baghouse shall immediately be inspected. The pressure drop across the baghouse will also be recorded twice per day. The typical operating range for this baghouse is 2-6 iWC.

2. Observe AC heater stack for visible emissions.

3. Walk around system listening for proper operation (audible leaks, proper fan and motor functions, bag cleaning systems, etc.).

4. Note any unusual occurrence in the process being ventilated.

5. Observe all indicators on control panel.

6. Assure that the dust is being removed from system and properly handled or disposed.

7. General visual inspection of plant site for visible dust emissions and/or the accumulation of dust. If visible emissions or accumulated dust are observed, take the necessary steps to remedy.

B. Weekly

1. Inspect screw conveyor and air lock bearings for lubrication.

2. Check the timing of the baghouse cleaning cycle.

3. Check pressure of the compressed air for cleaning the baghouse.

4. Check fan bearings.

5. Check fan for dust emissions.

C. Monthly

1. Inspect fan for corrosion and material build-up.
2. Check all drive belts and chains for wear and tension.
3. Inspect ductwork and baghouse housing for corrosion and erosion.
4. Check accuracy of all indicating equipment.
5. Blow out pressure tap lines of baghouse pressure drop measurement system.

D. Quarterly

1. Inspect paint.
2. Thoroughly inspect bags and bag retaining clamps.
3. Check screw conveyor flighting.
4. Check venturi nozzles and blow pipes for proper operation.
5. Check duct for dust build-up.

E. Annually

1. Check all bolts.
2. Check welds.
3. Inspect hopper for wear.
4. Check airlock rotor for wear.
5. Perform fluorescent tracer inspection of baghouse.
6. Calibrate temperature measuring devices for baghouse inlet temperature.
7. Calibrate baghouse pressure drop measurement system.

Preventive Maintenance Plan For Control Equipment (Lime Silo)

The following observations, checks and operations shall be conducted when off-loading lime into the silo. A copy of this plan will be made and used as a checklist to document each inspection. Any deficiencies will be documented and follow-up corrective actions will be done.

A. Off-loading lime.

1. Observe baghouse stack (visual). The presence of any visible emissions from the stack is an indication that there is a malfunction in the baghouse and that the baghouse shall immediately be inspected.

2. If emissions are observed coming from the baghouse, stop off-loading and check filters.

3. If problem persists, call for maintenance to repair baghouse.

4. Note any unusual occurrence during the off-loading process.

5. General visual inspection of lime silo for visible dust emissions and/or the accumulation of dust. If visible emissions or accumulated dust are observed, take the necessary steps to remedy.

B. Monthly

1. Inspect baghouse for corrosion and material build-up.

2. Inspect lime silo for corrosion.

Facility Inspections

The plant operator, prior to plant startup, will make daily inspections. These inspections will be made as described in the above referenced "Preventive Maintenance Plan for Control Equipment" section. In addition, an Environmental Coordinator will inspect the facility on a monthly basis to ensure the requirements of the permit are being kept and to assess the effectiveness of the training. Any deficiencies will be discussed with the plant manager. At the end of each inspection, corrective actions for noted problems will be discussed. The implementation of each corrective action will be reviewed during the next inspection to ensure that the problem has been resolved.

Testing

The permit requires annual visible emission testing using EPA Method's 5 and 9 to determine compliance with FDEP rules. This testing is done by an outside firm qualified to perform these services. In addition, several qualified ACCI personnel monitor the visible emissions on a regular basis.

Records

Records of the plant's operation are kept on-site in a logbook. The logbook tracks the following permit conditions: 1) tons of asphalt produced per day/year; 2) amount of fuel consumed per day/year; 3) pressure drop across baghouse recorded twice per day and 4) tank inspection reports. A current copy of the air operating permit is also kept in the logbook. These records are retained for a minimum of five years and shall be made available to the Florida Department of Environmental Protection (FDEP) upon request.