Memorandum

Florida Department of Environmental Protection

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Angelia Jackson
DATE: April 11, 2011
SUBJECT: Evaluation Summary for APAC Mid-South, Inc., Asphalt Plant #4025
Permit 7775073-009-AO, Escambia County

We recommend issuing a renewal permit to APAC Mid-South, Inc., to operate their Asphalt Plant #4025. This renewal permit follows permit 7775073-006-AO, effective February 20, 2006. During this renewal, the facility notified the Department that the facility name had changed from APAC – Southeast, Inc., - Gulf Coast Division to APAC Mid-South, Inc.

Process Description.
This facility is a relocateable double barrel hot mix asphalt concrete plant manufactured by Astech Industries. The facility consists of a control house, aggregate feed system, double barrel dryer drum with a 100 MMBtu/hr fuel fired burner, asphalt cement storage tanks with a fuel oil fired heater and asphalt storage silos. Particulate emissions from the plant are controlled by an Astech pulse jet baghouse. The fines from the baghouse are recycled into the asphalt mix. The plant has an operating capacity of 400 tons of asphalt mix per hour. Mixed asphalt concrete from the mixer unit is stored in three silos from truck loading. Fugitive emissions at the facility result from uncontrolled process emissions, aggregate stockpiles and vehicular traffic. 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.

Pollution Control Equipment.
Astech pulse jet baghouse controls Particulate emissions.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	62-210.300(3)(c)2.d	N/A	N/A	N/A	0.04 gr/dscf
SO2	N/A	N/A	98.5	N/A	<100
VOC	N/A	N/A	8.0	N/A	<100
NOx	N/A	N/A	13.8	N/A	<100
CO	N/A	N/A	32.5	N/A	<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	

Applicable Rules & Regulations.
This source is regulated in accordance with Rule 62-210.300(3)(c)2., F.A.C. (Conditional Exemptions from Title V Permitting). The facility is subject to NSPS, 40CFR part 60, subpart I. The facility is permitted to burn on-specification used oil. On-specification used oil is defined as used oil that meets the specifications of 40 CFR part 279 - Standards for the Management of Used Oil. The facility may use natural gas as fuel for the drum mixer and asphalt heater.

Compliance Monitoring.
Annually for PM and VE; Annual Operating Report (AOR). Recordkeeping required for verification of the fuel oil usage and asphalt production limitations.

Compliance History.
The facility permit application due date was 12/22/2010. Department received application 1/31/2011. Permit expiration date is 2/20/2011.
2011- 2009– Facility noted to be "In Compliance"
2008 – Compliance inspection noted the facility "Minor Non-Compliance" - Daily records for the baghouse pressure differential could not be located at the time of the inspection. On 11/30/2008 violation removed – No violation occurred.

Fee Summary. This is an AO2A ($1,500 fee) minor source with a stack test. The original construction permit fee was $2,000 for an AC1D facility (source25 TPY but less than 50TPY).

Additional Notes:
The applicant submitted $4,500 fee for original construction permit 7775073-001-AC for a AC1C facility (source less than 100 TPY) but had subsequently requested a refund, because emissions were estimated at 25 TPY but less than 50 TPY. The Department issued a refund in the amount of $2,500.

AMJ/c