Florida Department of

Memorandum

Environmental Protection

TO: Rick Bradburn
THROUGH: Armando Sarasua, P.E.
FROM: Angelia Jackson
DATE: December 29, 2010
SUBJECT: Evaluation Summary for Group III Asphalt, Inc., Cantonment Asphalt Plant, 7775278-005-AO, Escambia County

We recommend issuing a renewal permit to Group III Asphalt, Inc., to operate their Cantonment Asphalt Plant. This renewal permit follows permit 7775278-002-AO, effective January 24, 2006. That permit was revised by permit 7775278-004-AO which added the use of on-spec used oil as fuel. The expiration date of January 24, 2011 assigned to 7775278-002-AO was retained.

Process Description.
This facility consists of a 300 ton per hour triple drum mix asphalt plant. The maximum heat input of the drum dryer is 96.8 MMBtu per hour. Liquid asphalt is delivered by truck tankers, pumped into one of the two 24,000 gallon vertical storage tanks, and is heated by a 2.82 MMBtu/hr hot oil heater burning No. 2 fuel oil with a maximum sulfur content of 0.6% by weight. The plant is permitted to press recycled asphalt pavement (RAP).

Pollution Control Equipment.
Particulate emissions from the asphalt plant are controlled by a CMI Model RA 318 DTD baghouse system (BH-1). Air to cloth ration is 4.5:1, equipped with 716 Nomex bags.

Environmental Impact.

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	11.56	0.04 gr/dscf	<100
SO2	N/A	N/A	27	N/A	<100
VOC	N/A	N/A	8.00	N/A	<100
NOx	N/A	N/A	13.75	N/A	<100
CO	N/A	N/A	32.50	N/A	<100
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	40CFR60 Subpart I	N/A	N/A	Not more than 20% opacity	

* SO_2 emission based on AP 42 11.1-7 which states that 50% of fuel bound sulfur up to a maximum (as SO_2) of 0.1 lb/ton of product is expected to be retained in the product with remainder exiting as SO_2

Applicable Rules & Regulations.
The facility is regulated under 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. (Conditional Exemptions from Title V Permitting). The asphalt facility is conditionally exempt form Title V permitting with annual throughput limited to 500,000 tons of asphalt concrete per year. The facility oil consumption (asphalt plant and any portable crushers) is limited to 1.2 million gallons in any consecutive twelve-month period and the sulfur content of the fuel oil shall not exceed 0.6% by weight. The 0.6% sulfur limitation is self-imposed.

Compliance Monitoring.
Annual testing for VE and PM. Keep records of fuel oil usage. Submit annual AORs. The crusher must remain in compliance with its current AG.

Compliance History.
2010 – 2006 compliance inspections noted the facility to be "In-Compliance."

Fee Summary.
This is an AO2A ($1,500 fee) minor source with a stack test. The original construction permit fee was AC1D ($2,000 fee), Source 25 tons/yr but less than 50 tons/yr.

AMJ/c