Roads, Inc.
Cantonment Asphalt Plant
Facility ID No.: 7775285
Escambia County

Air Operation Permit
Permit No.: 7775285-003-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850/595-8300
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[Electronic file name: 7775285-003-AO.doc]

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Florida Department of Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
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Secretary

Permittee:
Roads, Inc.

Permit No.: 7775285-003-AO
Facility ID No.: 7775285
SIC No(s).: 2951
Project: Air Operation Permit

This permit is for the operation of the Cantonment Asphalt Plant located at 106 Stone Boulevard in Cantonment, Escambia County; UTM Coordinates: Zone 16, 470.31 km East and 3386.39 km North; Latitude: 30° 36' 35" North and Longitude: 87° 18' 53" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: April 22, 2011
Renewal Application Due Date: February 22, 2016
Expiration Date: April 22, 2016

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

Rick Bradburn
Air Program Administrator

RB/dm/c

Section I. Facility Information.

This is a renewal of Permit 7775285-002-AO, effective May 8, 2006. According to the permit renewal application, there have been no changes to the facility since the last renewal.

Subsection A. Facility Description.

This facility consists of a 160-ton per hour Almix counter-flow Duo Drum (drying and mixing drums positioned 90° relative to each other) mix asphalt plant constructed June 30, 2005. The maximum heat input of the dryer drum (Asphalt Equipment Company model 7624CF) is 75.6 MMBtu per hour. The mixing drum is a model 6014 manufactured by Asphalt Equipment Company. After the aggregate is thoroughly dried, in the drying drum, it is transferred by enclosed chute into the mixing drum where hot liquid asphalt is added to create the asphalt concrete. Liquid asphalt is delivered by truck tankers and pumped into one of the two storage tanks and is heated with an electric heater, which is exempt from permitting. The plant is also equipped to handle a maximum of 30% recycled asphalt paving (RAP) and is introduced into the drying drum next to the burner. Particulate Matter (PM) emissions produced by both drums are controlled by an Asphalt Equipment Company model 32KRA baghouse system (BH-1) having a total cloth-filtration area of 6,562 square feet and an air-to-cloth ration of 4:1. The filter bags are cleaned by reversing portions of the exhaust air back into the bags to remove the "dust cake." Fine PM from the BH-1 is collected by a screw conveyor and delivered back into the mixing drum.

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.

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 a synthetic minor source with annual throughput limited to 500,000 tons of asphalt concrete per year. The facility oil consumption (dryer and RAP crusher) is limited to 1.2 million gallons in any consecutive 12-month period and the sulfur content of the fuel oil shall not exceed 0.6%, by weight. This facility is allowed to operate with No. 2 fuel oil, No. 4 fuel oil or natural gas.

The facility is relocatable.

Based on the permit application received March 7, 2011, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Almix Model 7624 Duo Drum Mix Asphalt Plant

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application received March 7, 2011

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C., and Permit 7775285-001-AC]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C., and Permit 7775285-001-AC]

4. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. No emission control devices or systems are ordered at this time. [Rule 62-296.320(1), F.A.C.]

5. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Paving and maintenance of roads, parking areas and yards.
b) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
c) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
d) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
e) Landscaping or planting of vegetation.
f) Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c), F.A.C., and Permit 7775285-001-AC]

6. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rules 62-297.310(7)(b) and 62-297.620(4), F.A.C.]

7. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. [Rule 62-4.090, F.A.C.]

8. An Annual Operating Report for Air Pollutant Emitting Facility, DEP Form 62-210.900(5), shall be submitted for each year by April 1 of the following year. A copy of the form and instructions may be obtained from the Department's Northwest District office or electronically at http://www.dep.state.fl.us/Air/rules/forms/aor.htm. If the report is submitted using the Department's electronic annual operating report software, there is no requirement to submit a copy to any DEP or local air program office. [Rule 62-210.370(3)(c), F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850/595-8300; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-0578, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-0578 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

11. Environmental Compliance Plan (ECP). This plan outlines the procedures the permittee incorporates during the normal operation of this facility and provides necessary assurance that the facility will operate in compliance. The permittee shall follow all procedures outlined in the most recently submitted and approved Plan (Appendix ECP).

{Permitting Note: An Environmental Compliance Plan should be a living document that provides procedures to help in maintaining the subject facility in compliance with applicable air regulations. Keeping this document up to date with facility's current activities will not require any permit action; however, modifications shall be submitted to the Department for approval. This does not alleviate the facility from the air construction permitting requirements for facility modifications (per Rule 62-210.300(1)(a), F.A.C.)}

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	**Brief Description**
001	Almix Model 7624 Duo Drum Mix Asphalt Plant

This unit is a 160-ton per hour Almix model 7624 Duo Drum mix asphalt plant. The maximum heat input of the dryer drum (Asphalt Equipment Company model 7624CF) is 75.6 MMBtu per hour and is operated on natural gas, No. 2 fuel oil or No. 4 fuel oil.

This emissions unit 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 facility is a synthetic minor with annual throughput limited to 500,000 tons of asphalt concrete per year. The fuel oil consumption (dryer and RAP crusher) is limited to 1.2 million gallons in any consecutive 12-month period and the sulfur content of the fuel oil shall not exceed 0.6%, by weight. This facility is allowed to operate with No. 2 fuel, No. 4 fuel or natural gas.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable operating rate is 160 tons of asphalt concrete mix produced per hour. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., and Permit 7775285-001-AC]

A.2. Production. This unit's production rate shall not exceed 500,000 tons of asphalt concrete (RAP containing or non RAP containing) in any consecutive 12-month period. [Rules 62-4.160(2), 62-210.200(PTE) and 62-210.300(3)(c)2.a, F.A.C, and Permit 7775285-001-AC]

A.3. Methods of Operation. This unit may operate using No. 2 fuel oil or No. 4 fuel oil with a maximum sulfur content of 0.6%, by weight, or natural gas. Total oil consumption (for the dryer and portable RAP crusher) shall not exceed the Title V exemption limit [Rule 62-210.300(3)(c)2.b., F.A.C.] of 1.2 million gallons in any consecutive 12-month period. The owner shall maintain records to demonstrate that each shipment of fuel oil has 0.6% or less sulfur and that the sulfur content was determined by ASTM methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294- 90, adopted and incorporated by reference in Rule 62- 297.440(1), or updated versions of the referenced ASTM methods approved by the Department. [Rules 62-210.200(PTE) and 62-210.300(3)(c)2.b & c, F.A.C., and Permit 7775285-001-AC]

A.4. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.5. Particulate Matter. Particulate emissions, associated with the asphalt concrete plant, shall not exceed 0.04 grains per dry standard cubic foot averaged over a three-hour period. [Rules 62-204.800 and 62-210.300(3)(c)1., F.A.C., 40 CFR 60.92 (subpart I), and Permit 7775285-001-AC]

A.6. Visible Emissions. Visible emissions, associated with the asphalt concrete plant, shall be less than 20% opacity. [Rules 62-204.800(8)(b)12 and 62-210.300(3)(c)2., F.A.C., 40 CFR 60.92 (subpart I), and Permit 7775285-001-AC]

Test Methods and Procedures

A.7. Particulate Matter. The test method for particulate matter shall be EPA Method 5 or 5A, incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rules 62-210.300(3)(c)2.i and 62-297.401, F.A.C.]

A.8. Visible Emissions. The test method for visible emissions shall be EPA Method 9 (30 minutes), incorporated and adopted by reference in Chapter 62-297, F.A.C. [Rules 62-210.300(3)(c)2.i and 62-297.401, F.A.C.]

A.9.a. Visible emissions and particulate matter tests, associated with the asphalt concrete, are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The tests shall be conducted once during each federal fiscal year (October 1 through September 30). The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. [Rules 62-4.070(1), 62-210.300(3)(c)2.i and 62-297.401(5) and (9), F.A.C., and Permit 7775285-001-AC]

A.9.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7)(b), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7)(b) and 62-297.620(1), F.A.C.]

A.9.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070(1), F.A.C.]

A.10. Determination of Process Variables

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales,

shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5)(a) and (b), F.A.C.]

A.11. Required Stack Sampling Facilities for the Asphalt Concrete Plant. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29CFR Part 1910, subparts D and E (See Appendix SS-1). [Rule 62-297.310(6), F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

A.12. The operation of the baghouse shall be properly adjusted to maintain a 3 to 8 iWC change of pressure across the bags at all times. The pressure differential shall be checked once per day and the pressure readings recorded in a logbook and made available for inspection by the Department. [Rule 62-4.160(2), F.A.C., and Permit7775285-001-AC ECP]

A.13. The owner or operator shall maintain records to document the monthly and the 12-month rolling totals of tons of asphalt concrete produced, the gallons of fuel oil consumed by the dryer and the portable RAP crusher (if any), and the hours of operation. Such records shall be available for inspection and retained for five years. [Rules 62-4.070(1), 62-210.300(3)(c)2.g., F.A.C., and Permit 7775285-001-AC]

A.14. Any portable RAP crusher, operating at this facility, is subject to all the terms and conditions of its current Air General (AG) Permit and any denoted applicable condition of this Air Operating Permit. A portable RAP crusher shall be tested in accordance with its current AG permit requirements. [Rule 62-4.070(1), F.A.C.]

Location, Relocation, Co-Location

A.15. Prior to any relocation of the asphalt concrete plant, the owner or operator must submit for Department approval a Notification of Intent to Relocate Air Pollutant Emitting Facility [DEP Form 62-210.900(6)] and a $250 minor modification application fee to the appropriate District office at least 30 days prior to the relocation. The supplemental requirements of the form include:

1. 8½" by 11" plot plan showing the location of the main equipment and all emission points.
2. A vicinity map of the site location including familiar landmarks and the location of neighboring residences and other occupied dwellings.
3. Proof of compliance with emission standards demonstrated within one year of the date of request for relocation if this plant is being relocated to a different DEP District.
4. A plan to control emissions of unconfined particulate matter or fugitive dust in accordance with Rule 62-296.320(4)c., F.A.C.

The Department shall require Permittee to publish public notice of Proposed Agency Action, which shall be provided by the Department prior to issuance of authorization for the relocation.
[Rule 62-210.900(6), F.A.C., and Permit 7775285-001-AC]

A.16. This permit is a conditional exemption from Title V permitting in accordance with Rule 62-210.300(3)(c)2, F.A.C. An asphalt plant claiming this exemption from Title V air permitting shall not

collocate with, or relocate to, any Title V source; nor shall it create a Title V source in combination with any other collocated facilities, emissions units, or pollutant-emitting activities, including any such facility, emissions unit, or activity that is otherwise exempt from permitting. [Rules 62-210.300(3)(c) and 62-210.300(3)(c)2.j., F.A.C.]

A.17. This facility is subject to all applicable requirements of Title 40, Code of Federal Regulations, part 60, subpart A, General Provisions, and subpart I, Standards of Performance for Hot Mix Asphalt Facilities. [Rule 62-204.800(8)(b)12. & (d), F.A.C.]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.