Environmental Compliance Plan

For

Roads, Inc.
Cantonment Plant

7775285

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Introduction

This plan provides basic information demonstrating the owner's commitment to operating this facility in compliance with DEP Operation Permit requirements and sound environmental principles in general. It also provides reasonable assurance that the continued operation of the facility will stay within such norms.

The detail of this Plan is consistent with the complexity of the system. It was developed in accordance with the unique requirements of this facility and provides the operator with adequate information and description regarding the design, operation and maintenance features. In addition information concerning process control and performance evaluation for the facility, as well as equipment and procedural descriptions (including any notification/report requirements of appropriate agencies) for emergency operating conditions is included. Regular maintenance and repair instructions for plant equipment and monitoring procedures are also included.

Corporate Commitment

Roads, Inc. adheres to a strong, facility-wide environmental program and relies on a comprehensive environmental program, which was developed to ensure the highest commitment and quality from the business operation as well as from employees, to protect and enhance the environment. This program includes an environmental policy, environmental auditing procedures and employee education and involvement. All managers realize that it is just good business sense to protect the environment.

Operator Training

This Plan represents continuing education program for all plant operators concerning plant operation, permit and other regulatory requirements. A copy of the approved Plan will be available to the operators, maintenance personnel, technicians, and laboratory personnel.

Personnel are trained to operate facility in accordance to factory training manual(s) and this Plan. Consequently, new employees will be trained within 90 days after commencement of employment and prior to unsupervised equipment operation. In addition periodic safety meetings are required for all plant personnel and often cover environmental topics including air permit requirements.

Environmental education is key to maintaining successful environmental stewardship. Education includes new operator's orientation and training sessions. During orientation, new hires are educated about the various permits, permit conditions and monitoring requirements.

The training sessions teach personnel about dust control, waste management, spill prevention, air permits and other environmental topics. These training sessions are intended to teach plant management the environmental issues so they, in turn, teach their employees.

Plant operators also get trained on how to read opacity from their stacks, which of course, is very important when running the asphalt plant.

Plant Monitoring

This section establishes the use of parameters to monitor plant operation such as pressure differentials and visible emissions. The Company conducts reasonable monitoring to assure compliance with the terms and conditions of their permit. The monitoring will be carried out in the manner prescribed in this procedure.

The performance parameters include such physical, chemical or electrical characteristics as are applicable to particular emissions unit and which are indicators of the condition, operating rates and efficiencies. Such parameters generally include the following indicators for baghouses:

Bag pressure drop
Gas flow rate
Air to cloth ratio
Bag weave
Bag material
Gas temperature, inlet and outlet
Condition of bags
Frequency of reverse airflow operation

The operating protocol addresses the physical steps and procedures to be followed by the operator when monitored parameters are outside the typical operating range. Proper operation of baghouse dust collector requires the use of differential pressure gauges (such as magnehelic) that can indicate a sudden decrease in pressure (a system leak) or a sudden rise in pressure (binding or plugging problems). U-tube manometers can also be used to help identify problems with dampers and bags by indicating the difference in the pressure across the baghouse. A magnehelic gauge or manometer indicates the pressure differential across the filter elements in inches of water.

All asphalt plants create fine dust carryout from drum dryer. In order to meet Federal and State air quality codes, emission control equipment is necessary to capture particulate emissions that might otherwise be released into the atmosphere. During the dust filtering operation exhaust air from the drum-mix blows through filtering media contained inside the baghouse.

Resistance resulting from such flow is called pressure drop and is measured in inches of water. In order for a filtering media to filter dust properly such pressure drop must be maintained within specific limits specific to individual baghouse. In order to maintain correct pressure differential across filtering bags, a cyclic timer periodically actuates the reverse air flow system which reverses portion of exhaust air back into portion of baghouse causing filtering elements to clean.

Generally the operating parameters of the baghouse type pollution control equipment to be monitored are as follows:

Pressure drop (Delta P) across baghouse
Visible emissions

The pressure drop across the baghouse is a useful parameter to monitor baghouse performance. A given baghouse will operate within a pressure drop range of 3" – 8" WG

A pressure drop lower than the lower than 3" WG indicates:

New bags which have not developed a filter cake
Bag failure
Baghouse structural failure
Ductwork structural failure.

A pressure drop higher 8" indicates:

Plugged bags
Blocked stack
Fan malfunction
Plugged ductwork

This plan provides for monitoring of baghouse pressure drop. Known data have been established to indicate typical operating range of pressure drop for this baghouse. Any values noted which fall significantly outside this range will be noted. An appropriate investigation will follow to determine the cause of the variation and to evaluate any attendant effect on visible emissions.

Additionally, the permit requires annual particulate matter testing using EPA Method 5, to determine compliance with DEP rules and the New Source Performance Standard. Each such annual testing event will provide an opportunity to evaluate a possible correlation between baghouse pressure drop, opacity and particulate matter emission rate. A daily observation of stack gas opacity will be conducted by the plant operator, as part of the daily inspection (see Facility Inspections).

The pressure drop (Delta P) across the baghouse will be monitored at least once during each day of plant operation. The Delta P value will be logged on the plant's daily production report. The numerical value of this parameter, in units of water, will be determined by a magnehelic gauge.

Operation and Maintenance Plan

This section establishes a plant specific Operations and Maintenance (O & M) Plan. This element provides reasonable assurance that this facility can be effectively operated and maintained, through reasonable provisions for the operation and maintenance of the facility. Routine maintenance of equipment will be performed as needed to assure optimal operation. The facility shall be operated to control objectionable odors in accordance with Rule 62-296.320(2), F.A.C. Fuels, solvents, lubricants and other maintenance materials shall be stored in approved areas.

This plan includes a schedule for the maintenance and inspection of the control device and collection system and schedule for recording performance parameters of the control device. The Operation and Maintenance Plan included identification of the control device for each emissions unit subject to provision of Plan, including the following design specifications and other descriptive data:

Drum Mix Plant: Asphalt Equipment Co., Model 7624 CF :
Baghouse: Asphalt Equipment Co., Model 32 KRA
Type: Reverse Air Flow
Flow rate (gas): 26,923 ACFM at average temp of 240 F (as recorded during PM test)
Efficiency rating at design capacity: 99.9%
Pressure drop: 5.1" W.G (during PM test)
Operating range: 3-8" W.G.

Plan also includes performance parameters that indicate the rate of operation, process production rate and fuel description. Such parameters include the following:

Weight per unit time of asphalt concrete produced in: 160 **TPH maximum**
Dryer Burner fuel: No. 2 distillate or No. 4 fuel oil both with max. sulfur content of 0.6%. or natural gas.

Startup of baghouse:

Start all electric drive components to ensure proper rotation

Check and make sure that cleaning of filtering system is operating

Check and make sure that filtrates removal system from baghouse hopper is operating properly.

Run exhaust fan and check to see that magnehelic gauge lines are hooked up correctly.

At start-up, preheat baghouse to 300 F before aggregate is introduced into dryer. Preheating time will vary according to ambient temperature and moisture conditions at plant site. NOTE: This should be done first thing in the morning and then again only after prolonged shutdowns during the day (30 minutes or more).

Minimum inlet temperature to baghouse should never be allowed to fall below 240 F or condensation may occur inside the baghouse causing bag mudding, bind with a result of very high static pressures and loss of adequate draft for proper dryer operation.

Shutdown of baghouse

At shutdown, always keep timer and augers operating after dryer shutdown to clean out baghouse. This will prevent a cold slug of dust from reaching the plant at next start-up. Also the dust auger could be stalled if slugged with cold, wet dust.

If at any time a constant stream of dust is being emitted from the fan stack, check for a mechanical leak or worn/torn bag(s). If a leak develops, the area can usually be easily spotted from the clean airside by a large deposit of dust around the leak area. Should a leak develop, clean dust from area and reseal both sides of leak with RTV732 silicone sealant or equivalent. This type of sealant is required to withstand the high temperatures of a baghouse.

Access doors allow for maintenance personnel to enter the baghouse equipment for leak detection, filter bag changes and proper identification of

operational problems. These doors need to create a positive seal to reduce baghouse or ambient air intake and heat loss on all negative systems. They also need to seal properly to reduce condensation that can cause filter bag damage and severe metal corrosion. To prevent air infiltration and insure a positive contact between the door and seal and door pan, a proper door seal material must be used. There are various materials designed to meet the specific needs of door applications based on gas chemistry, temperature and door configurations. Check seals periodically and whenever the baghouse is opened for repairs or change outs.

Routine maintenance includes:

WEEKLY

Apply grease to all grease fittings

Adjust all belt tensions

MONTHLY

Blow out differential pressure gauge lines

ANNUALLY

Shut down the plant's operations each year to conduct preventive maintenance procedures

These preventive maintenance procedures include changing the bags in the baghouse as needed and turning the burner for maximum burner efficiency as needed.

Facility Inspections

This element describes the use of periodic facility "walk-through inspections" by plant staff with specific inspection guidelines. The condition of facility will be noted and compared to its condition during the initial survey and during subsequent inspections.

Daily inspections are made by plant operator prior to plant startup to make sure emission control components are in good working order. Proper maintenance and record keeping play a vital role in the operation of a baghouse. The information gathered can assist in implementing an effective preventive maintenance program. The documentation of inspections, observations and maintenance will help determine the baghouse operating efficiency and help prevent a plant from reaching noncompliance status.

Routine observations of the pollution control device are:

DAILY

Record Differential Pressure
Check operation and frequency of reverse air flow system.
Check baghouse filtrates conveying system
Check for visible stack emissions
Check for miscellaneous visible emissions throughout plant

MONTHLY

Check access door seals for leaks
Check door seals for deterioration

SEMI-ANNUALLY

Inspect all accessible functional spaces
Record frequency of reverse flow operation
Check bag conditions (dirty side)
Check fan
Check all belt tensions

ANNUALLY

Check case support for corrosion
Check all bolts and welds
Check ductwork for buildup of dust

Records

Records of inspections, maintenance and performance data of control devices and auxiliary equipment shall be retained for a minimum of five years and shall be made available to DEP upon request. These records are retained at the plant office.

Records that should be kept regularly include baghouse pressure drop. Recordings are maintained to be used in comparison to current baghouse data.

Records requirements shall include:

Records of control equipment operating parameters

Records of control system malfunctions or failures and corrective actions taken

Results of compliance tests required by DEP shall be reported to DEP within 45 days after completion of the test.

Periodic Plan Review

This plan will be reviewed at least annually from date of approval. This review will evaluate the effectiveness of the Plan and will make any changes necessary for the Plan to be continuously administered.

The Environmental Compliance Plan shall be updated as operations change, but no less frequently than upon renewal of permit. DEP shall be notified of changes to this plan other than those required for routine maintenance. The Environmental Compliance Plan shall be revised when operational procedures change, to reflect any facility alterations performed or to reflect experience resulting from facility operation. The Company will periodically review and revise the operating protocol, as appropriate, to ensure satisfactory system performance.

Abnormal Events

In the event the Company is temporarily unable to comply with any of the conditions of DEP permit due to breakdown of equipment, power outages, and destruction by hazard of fire, wind or other cause, the Company will notify DEP. Notification shall be made in person, by telephone, or other means within 24 hours of breakdown or malfunction. The telephone number to call to notify DEP is (**850) 595-0578**. For emergencies involving a significant threat to human health or the environment, the number is (**850) 320-0519.**

A written report of any noncompliance referenced above shall be submitted to the **Florida Department of Environmental Protection**, **160 West Government Street, Pensacola, FL 32502-5740,** within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of the problem and time when the facility will again be operating in accordance with permit conditions.

If an emergency arises or there is any condition, which prevents the continued operation of the emissions control components or results in non-compliance with applicable regulations, the operator will:

Stop production immediately

Notify Area Superintendent(s), as soon as practically possible, of the time, date and nature of the occurrence and the corrective action(s) taken

Ensure that the emission control components are in good working order before resuming production.

Roads, Inc.

Daily Log

Date: _____

Tons Mixed: _____

Hours Operated: _____

Average tons/hr (tons/hours): _____

Daily Checks

Magnehelic Reading: _____”W.G.

Stack Visible Emissions Present: _____yes _____no

Reverse Airflow system operating. _____yes _____no

Baghouse filtrates conveying system operating:: _____ yes _____ no

_____ _____

(date) (Plant Manager)