**Florida Department of**

# Memorandum

# Environmental Protection

**TO:** Rick Bradburn
**THROUGH:** Armando Sarasua, P.E.
**FROM:** Angelia Jackson
**DATE:** April 4, 2011
**SUBJECT:** Evaluation Summary for Anderson Columbia Company, Inc., Plant #4; 7775294-003-AO, Bay County

We recommend issuing a renewal permit to Anderson Columbia Company, Inc., to operate their Plant #4. This permit follows 7775294-002-AO, effective April 13, 2006.

**Process Description**.
This facility consists of a 300 ton per hour capacity double drum mix asphalt plant. The maximum heat input of the drum dryer is 87.5 MMBtu/hr and will operate on No. 2 through No. 6 fuel oil or natural gas. Liquid asphalt is delivered by truck tankers and pumped into one of the two vertical storage tanks and is heated by an exempt 2.0 MMBtu/hr hot oil heater burning No. 2 fuel oil with a maximum sulfur content of 0.5%, by weight. Particulate matter (PM) emissions from the plant are controlled by baghouse. Fine PM from the baghouse is recycled into the asphalt mixing drum. This plant is permitted to process recycled asphalt pavement (RAP). A portable RAP crushing unit, with a current air general permit, will be operated at the facility periodically to provide RAP for the asphalt mix. Fugitive emissions at the facility result from uncontrolled process emissions, aggregate stockpiles and vehicular traffic.

**Pollution Control Equipment**.
PM emissions are controlled by baghouse and fuel oil sulfur content. SO2 emissions are controlled by fuel oil sulfur content..

**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 | 10.91 | N/A | 0.04 gdscf |
| SO2 | N/A | N/A | 69.56 | N/A | N/A |
| VOC | N/A | N/A | 8.00 | N/A | N/A |
| NOx | N/A | N/A | 13.75 | N/A | N/A |
| CO | N/A | N/A | 32.50 | N/A | N/A |
| 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 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 from Title V permitting with annual throughput limited to 500,000 tons of asphalt concrete per year. The facility oil consumption is limited to 1.2 million gallons in any consecutive twelve-month period and the sulfur content of the fuel oil shall not exceed 1.0%, by weight.

**Compliance Monitoring.**
Annual VE and PM testing and annual submittal of AOR report. In addition, the facility is required to maintain fuel sulfur content records and monthly records of asphalt produced, fuel usage, and operational hours. The facility also is required to operate in accordance with the most recently submitted and Department approved O & M Plan.

**Compliance History**.
Compliance Inspections from **2010 – 2006,** noted the facility as "In-Compliance."

**Fee Summary**. This is an AO2A ($1,500 fee) minor source with a stack test. *The original construction permit fee was $4,500 for 50 tons/yr but less than 100 tons/yr. SO2 emissions, based on AP 42 11.1-7, which states that 50% of fuel bound sulfur up to a maximum (as SO2) of 0.1 lb/ton of product is expected to be retained in the product with remainder existing as SO2.*

***Additional Notes.*** *This permitted plant (Plant #4) replaces the previously operated Anderson Columbia Batch plant at this location (Plant #14). Plant #14's operation permit (0050005-005-AO) was surrendered by Anderson Columbia letter dated March 30, 2006.*

AMJ/c