Florida Department of Environmental Protection

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Secretary

PERMITTEE

Ajax Paving Industries of Florida, LLC
Six (6) Existing Hot Mix Asphalt Plants

Authorized Representative:
Mr. Vince L. Hafeli, V.P. - Plants & Materials

Final Permit No. 7775592-002-AC
Air Construction Permit Revision

Project: Request to Exempt 4 Emissions Units (E.U.s) from Air Permit No. 7775592-001-AC

Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota Counties, Florida

PROJECT

This is the final air construction permit revision, which reclassifies the two (2) portable lime storage silos and two (2) portable fiber feeders to being exempt from air permitting as allowed by Rule 62-210.300(3)(b)1., F.A.C. (Project). The portable lime storage silos and portable fiber feeders can be located at any of the six existing hot mix asphalt (HMA) plants at locations in Florida, which are categorized under Standard Industrial Classification Code No. 2951, Asphalt Paving Mixtures and Blocks.

This final permit is organized into the following sections: Section I (General Information), Section II (Requirements) and Section III (Permit Revisions); and, Section IV (Appendices). Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section IV of this permit.

STATEMENT OF BASIS

This air pollution construction permit revision is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is <u>not</u> subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit revision, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Tallahassee, Florida
For the Division of Air Resource Management
(Electronic Signature)

A.A. Linero
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for Jeffery F. Koerner, Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

JFK/aal/sms

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit Revision) was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. Vince L. Hafeli, V.P., Ajax Paving Industries of Florida, LLC: vhafeli@ajaxpaving.com
Mr. Lynn Robinson, P.E., Southern Environmental Sciences, Inc.: lrobinson@sesfla.com
Mr. Jerry Campbell, Environmental Protection Commission of Hillsborough County: campbell@epchc.org
Ms. Susan Cameron, Sarasota County: scameron@scgov.net
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Ms. Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.
(Electronic Signature)

Lynn Scearce
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FACILITY DESCRIPTION

Ajax Paving Industries of Florida, LLC (Ajax), owns and operates six (6) existing hot mix asphalt (HMA) plants, which are categorized under Standard Industrial Classification Code No. 2951, Asphalt Paving Mixtures and Blocks. The existing Ajax relocatable or stationary HMA facilities affected by this permitting action are identified below. Ajax is authorized to set-up a relocatable lime silo and/or a relocatable mineral wool (or other non-asbestos-containing fiber types) asphalt reinforcement fiber feeder system for use at any of the six existing HMA plants. Each HMA plant has a main baghouse control system that will be used to control the particulate matter and visible emissions contributed by the fiber feeder system and lime feed to the asphalt plant mixing drum. The lime silo is equipped with an integral dust collection filter which controls dust in air displaced from the silo during pneumatic loading of lime into the silo from tanker trucks. The portable units will be based out of the Nokomis/Sarasota County HMA plant location.

The potential locations are:

1. Nokomis HMA Plant, 510 Gene Green Road, Laurel, Sarasota County; Facility ID No. 1150103;
2. Tuckers Corner HMA Plant, 40851 Cook Brown Road, Punta Gorda, Charlotte County; Facility ID No. 0150028;
3. Port Manatee HMA Plant, 12165 U.S. 41 North, Palmetto, Manatee County; Facility ID No. 0810063;
4. Pennsylvania Street HMA Plant, 7121 Pennsylvania Street, Fort Myers, Lee County (Relocatable Plant); Facility ID No. 7774822;
5. Odessa HMA Plant, 11603 County Road 54 West, Odessa, Pasco County; Facility ID No. 1010027; and
6. Tampa HMA Plant, 5960 Jensen Road, Tampa, Hillsborough County (Relocatable Plant); Facility ID No. 7775424.

This project will affect the following permitted emissions units/activities:

E.U. ID No.	Brief Description
001	Portable Lime Silo, 34 ton
002	Portable Lime Silo, 34 ton
003	Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)
004	Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)

Facility Regulatory Categories

- Each affected HMA facility is not a major source of hazardous air pollutants (HAP).
- Each affected HMA facility operates no unit subject to the acid rain provisions of the Clean Air Act.
- Each affected HMA facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- Each affected HMA facility is not a major source of air pollution in accordance with Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

PROPOSED PROJECT

This project is for a minor source air construction permit revision is to reclassify the two (2) portable lime storage silos and two (2) portable fiber feeders because they are exempt from air permitting as allowed by Rule 62-210.300(3)(b)1., F.A.C.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for Air Construction Permit Revision received on August 6, 2012 (date received $250.00 permit processing fee) (complete).

SECTION II. REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance, Division of Air Resource Management, Florida Department of Environmental Protection (Department). The mailing address for the Office of Permitting and Compliance is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests and notifications shall be submitted to the appropriate Compliance Authority.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); and, Appendix B (General Conditions).

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and, Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 & 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. Construction and Expiration: The Department may extend the expiration date upon a satisfactory showing that an extension is justified. For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Office of Permitting and Compliance at least sixty (60) days prior to the expiration of this permit. [Rules 62-4.070(4), 62-4.080, 62-210.300(1), and 62-212.400(6)(b), F.A.C.]

6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

7. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) & 62-212.300(1)(a), F.A.C.]

8. Effect on Other Permits: The conditions of this permit supersede those contained in Permit No. 7775592-001-AC. [Rule 62-4.070(1)&(3), *Reasonable Assurance*, F.A.C.]

SECTION III. PERMIT REVISIONS

The following permit conditions are revised as indicated. ~~Strikethrough~~ is used to denote the deletion of text. Double-underlines are used to denote the addition of text. All changes are emphasized with yellow highlight in the electronic document.

FACILITY DESCRIPTION

Exempt Activities:
Portable Lime Silo w/ Integral Silo Vent Baghouse
Portable Fiber Feeder System Integral to an HMA Plant

Permit Being Modified: Permit No. 7775592-001-AC
Affected Emissions Units: Two (2) Portable Lime Storage Silos and Two (2) Portable Fiber Feeders

The affected specific conditions from Permit No. 7775592-001-AC are hereby changed as follows:

…

SECTION 2. ADMINISTRATIVE REQUIREMENTS

…

~~12. Facility Relocation: The permittee is authorized to relocate a lime silo and/or a fiber feeder system to any site within a previously "permitted county" as identified in Appendix PC of this permit. With a 1-day advance notification (phone call, e-mail, facsimile or office visit), the permit authorizes relocation of the portable unit to any site within the permitted counties. For each relocation and within at least five days of relocating, the permittee must submit a "Facility Relocation Notification Form" [DEP Form No. 62-210.900(6), F.A.C.] to the current Compliance Authority and the new Compliance Authority identifying the move. This air construction permit does not relieve the owner from complying with other local provisions such as zoning requirements. [Rules 62-4.070(3) and 62-210.370(4), F.A.C.]~~

~~13. Adding New Permitted Counties: A portable lime silo and/or a fiber feeder system shall only be relocated to sites within previously permitted counties as identified in Appendix PC of this permit. To add a county to the list of permitted counties, the permittee shall provide the Bureau of Air Regulation with a letter of request with the following information: identification of the affected HMA plant and its air operation permit; a statement that there have been no physical changes made to the portable lime silos and fiber feeder systems nor any change in the method of operation; the latest compliance test report; a list of previously permitted counties; and the new county to be added and the specific site where a portable lime silo and/or a fiber feeder system will be located in the future (if known). A copy of this information shall be submitted to the appropriate Compliance Authority for the proposed new site. The Bureau of Air Regulation will process the request as a modification of the air construction permit. The permittee must publish a new Public Notice provided by the Bureau of Air Regulation in a newspaper of general circulation for the new county. The Public Notice provides administrative rights for affected parties to petition for an administrative hearing or provide comments on the draft permit. If there are no substantial comments and no petitions for administrative hearings, the Department will issue a final air construction permit and a revised air operation permit recognizing the new permitted county. The permittee is authorized to relocate a portable lime silo and/or a fiber feeder system upon issuance of the final modified air construction permit and issuance of the revised air operation permit for the HMA plant. [Rules 62-210.300(1) & (2) and 62-210.350, F.A.C.]~~

~~SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS~~

~~A. Portable Lime Silos (2)~~

~~This section of the permit addresses the following emissions units or activities.~~

~~ARMS ID No.~~	~~Emissions Unit Description~~
~~001~~	~~Portable Lime Silo, 34 ton~~
~~002~~	~~Portable Lime Silo, 34 ton~~

~~EQUIPMENT~~

~~1. Relocatable Portable Lime Silos: The permittee is authorized to construct (assemble, dismantle and reassemble) two relocatable portable lime silos with an integral dust collector for controlling particulate matter and visible emissions from its operation. Each lime silo has a capacity of 34 tons. Each lime silo will typically process approximately 2,500 tons per year of lime based on a blend of approximately 1% by weight of the HMA processing rate. The dust collector shall be a Belgrade Steel Tank Company pulse-jet baghouse dust collector, Model No. Belle 225 (silo dust collector), or equivalent, located atop the silo. Each silo dust collector shall be designed to achieve an outlet dust loading of 0.01 grains per standard cubic feet (gr/scf) of exhaust. For maintenance, collector bags or cartridges shall only be replaced with bags that meet this design specification. Each portable lime silo is designed to be dismantled, moved to a new location and reassembled. [Design and Application No. 7775592-001-AC]~~

~~PERFORMANCE RESTRICTIONS~~

~~2. Lime Usage at Existing HMA Plants: The usage of the lime will not increase the permitted production rate nor the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. [Rule 62-4.070(3), F.A.C.]~~

~~3. Permitted Counties: The permittee may relocate a lime silo to any HMA plant site within a previously permitted county as identified in Appendix PC. The air operation permit for each HMA plant must also authorize this equipment prior to relocation. The conditions of this permit apply to each lime silo as a whole regardless of the sites at which it may operate during any year. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]~~

~~4. Hours of Operation: The hours of operation are not limited (8760 hours per year). [Rule 62-210.200 (Definitions-PTE), F.A.C. and Application No. 7775592-001-AC]~~

~~5. Operations – Each Lime Silo:~~

~~a. Pneumatic Filling From and Emptying Into a Bulk Lime Tanker Truck: The associated lime silo dust collector shall be in operation while the silo is being pneumatically filled from a bulk lime tanker truck and while the silo is being pneumatically emptied back into a bulk lime tanker truck.~~

~~b. Making Asphalt Product: During asphalt production, lime from the lime silo shall be fed in an enclosed manner into the enclosed auger that carries fine particles from the HMA plant's main baghouse to the HMA mixing drum in order to maintain the operation under negative pressure. The lime silo's baghouse shall be operated as necessary during operations with the HMA plant.~~

~~EMISSIONS STANDARDS~~

~~6. Dust Collector Design Specifications for Control of Particulate Matter (PM): The minimum design specifications of the dust collector control system, including replacement filters, shall meet 0.01 grains per standard cubic foot. Since PM emissions are controlled by a dust collector and the potential emissions are less than 100 tons/year, the Department will establish an alternative visible emissions standard of 5% opacity in lieu of PM testing. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; and Application No. 7775592-001-AC]~~

~~7. Visible Emissions – Each Lime Silo:~~

~~a. During the filling and emptying of a lime silo with a bulk lime tanker truck and during operations with a HMA plant, visible emissions from the lime silo baghouse shall not exceed 5% opacity, as determined by EPA Method 9 and in accordance with Rule 62-297.400, F.A.C. [Rule 62-297.620(4), F.A.C. and Application No. 7775592-001-AC]~~

~~b. *Hillsborough County*: "The permittee shall not cause, permit or allow any visible emissions greater than 5% opacity from any (1) loading or unloading of materials to or from containers such as railcars, trucks, ships, storage structures and stockpiles, (2) receiving hoppers, (3) belt conveyors, and (4) static drop transfer points, when operating in the following designated air quality maintenance area for particulate matter: "That portion of Hillsborough County which falls within the area of the circle having a center point at the intersection of U. S. 41 South and State Road 60 and a radius of 12 kilometers." [Rules 62-204.340 and 62-297.400, F.A.C.; and Rule 1-3.52.2, Rules of EPCHC]~~

~~EMISSIONS PERFORMANCE TESTING~~

~~8. Initial and Annual Compliance Tests – Each Lime Silo: For each lime silo, the loading of lime from a truck is a batch operation. An initial and subsequent annual compliance test using EPA Method 9 shall be conducted on the lime silo's baghouse dust collector system to determine compliance with the visible emissions standard. The compliance test shall be equal to the duration of the batch cycle or operation completion time pursuant to Rule 62-297.310(4)(a)2.a., F.A.C. The annual visible emissions test shall be conducted every fiscal year (October 1 – September 30) at only one HMA plant. The test report shall be sent to the Compliance Authority, for the HMA plant tested, with copies to the other Compliance Authorities where these emissions units or activities are authorized to operate in Appendix PC. Tests shall also be conducted in accordance with the testing requirements specified in Appendix CC of this permit. [Rules 62-297.310(4)(a)2.a. and 62-297.310(7)(a)1, F.A.C.]~~

~~9. Tests Prior to Renewal: Within the 12-month period prior to expiration of the operation permit, the baghouse dust collector system's exhaust shall be tested to demonstrate compliance with the visible emissions standards of this permit. [Rules 62-297.310(4)(a)2.a. and (7)(a)3., F.A.C.]~~

~~10. Test Notification: At least 15 days prior to conducting any tests, the permittee shall notify the Compliance Authority for the site to be tested in writing of the following information: the date, time, and place of each such test; and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.; and Rule 1-3.24, EPCHC]~~

~~RECORDS AND REPORTS~~

~~11. Monthly Records: The permittee shall record the following information in a written log for the operation at each site: tons of material (lime) processed by site. [Rule 62-4.070(3), F.A.C.]~~

~~12. O&M Plan: The permittee shall keep an operation and maintenance (O&M) plan for the dust collector control systems on each lime silo. The O&M plan shall include: the collector bag or filter specifications and a plan for regular maintenance. [Rule 62-4.070(3), F.A.C.]~~

~~SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS~~

~~B. Portable Fiber Feeder Systems (2)~~

~~This section of the permit addresses the following emissions units or activities.~~

~~ARMS ID No.~~	~~Emissions Unit Description~~
~~003~~	~~Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)~~
~~004~~	~~Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)~~

~~EQUIPMENT~~

~~1. Relocatable Portable Fiber Feeder Systems: The permittee is authorized to construct (assemble, dismantle and reassemble) two relocatable portable fiber feeder systems to inject fibers into the HMA plant. Each fiber feeder system will typically process approximately 900 tons per year of fiber based on a blend of approximately 0.4% by weight of the HMA processing rate. The fiber feeder system is connected through hose and piping to the HMA plant's mixing drum and maintained under negative pressure by exhausting the air through the integral HMA plant's main baghouse dust collector. For maintenance, collector bags will only be replaced with bags that meet the design specification of the HMA plant's main baghouse dust collector. Each portable fiber feeder system (2) is designed to be dismantled, moved to a new location and reassembled. [Design and Application No. 7775592-001-AC]~~

~~PERFORMANCE RESTRICTIONS~~

~~2. Fiber Usage at Existing HMA Plants: The usage of the fiber material will not increase the permitted production rate nor the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. [Rule 62-4.070(3), F.A.C.]~~

~~3. Permitted Counties: The permittee may relocate a fiber feeder system to any HMA plant site within a previously permitted county as identified in Appendix PC. The air operation permit for each HMA plant must also authorize this equipment prior to relocation. The conditions of this permit apply to each lime silo as a whole regardless of the sites at which it may operate during any year. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]~~

~~4. Hours of Operation: The hours of operation are not limited (8760 hours per year). [Rule 62-210.200 (Definitions-PTE), F.A.C. and Application No. 7775592-001-AC]~~

~~5. Operations – Each Fiber Feeder System: Prior to and during operations, the fiber feeder system shall be connected through hose and piping to the HMA plant's mixing drum and maintained under negative pressure by exhausting the air through the integral HMA plant's main baghouse dust collector. [Rule 62-4.070(3), F.A.C. and Application No. 7775592-001-AC]~~

~~RECORDS AND REPORTS~~

~~6. Monthly Records: The permittee shall record the following information in a written log for the operation at each site: tons of fiber material processed by site. [Rule 62-4.070(3), F.A.C.]~~