Curle, Mary Beth

From: Sarasua, Armando
Sent: Friday, October 12, 2012 9:14 AM
To: crawson@roadsinc.com
Cc: Curle, Mary Beth; Ard, Howard; tom@selanddesign.com; dhitchcock@ascendantllc.net
Subject: Roads Inc new Cantonment Asphalt Concrete Plant 7775744-001-AC

Cody Rawson
Roads Inc
106 Stone Blvd
Cantonment, FL 32533
850 968 0991
crawson@roadsinc.com

Debbie Hitchcock, PE
Ascendant Solutions, LLC
2019 N 12th Ave
Pensacola FL 32503
Cell: 850.232.8871
dhitchcock@ascendantllc.net

Dear Mr. Rawson,

This is to document our conversation this morning regarding the new Roads, Inc. Cantonment Asphalt Concrete Plant's permit application, DEP Project # 7775744-001-AC. As we discussed, there is no problem with the application or draft permit. I just wanted you to consider the information given below as you review your draft air construction permit.

The application stated the facility will not use more than 1.1 million gallons of fuel oil in any rolling consecutive 12-month period, and that the fuel oil sulfur content would not exceed more than 0.6% by weight. The intent apparently is to limit sulfur dioxide emissions to less than 50 TPY. A facility wanting to use the conditional exemption from Title V permitting under Rule 62-210.300(3)(c)2., F.A.C., would normally be allowed 1.2 million gallons of fuel oil in any rolling consecutive 12-month period, and a fuel oil sulfur content not to exceed more than 1% by weight.

A processing fee of $2,000.00 was sent with the application. This is appropriate for processing an air construction permit for a facility subtype 1D, a source emitting at least 25 TPY but less than 50 TPY. [Rule 62-4.050(4)(a)2.c., F.A.C.]

Accordingly, the following limitation has been placed in the facility's draft permit.

> Authorized Fuel: The facility may use natural gas or fuel oil. The total combined amount of fuel oil consumed by the asphalt concrete plant, including the portable RAP crusher and other stationary oil burning equipment, shall not exceed 1.1 million gallons in any consecutive 12-month period. The facility may not use fuel oil that has a sulfur content of more than 0.6% by weight. [Rules 62-210.200(PTE) and 62-210.300(3)(c)2.b. & c., F.A.C., requested by applicant and Application No. 7775285-001-AC]

Please note that the self-imposed fuel oil restrictions may become inconvenient in the future if the facility wishes to use more than 1.1 million gallons of fuel oil per consecutive 12 month period. The total fuel oil usage of all stationary fuel oil burning equipment (crusher, dryer, heaters) on the site would be counted against the 1.1 million gallons limitation. The fuel oil restrictions may also become inconvenient in the future if the facility wishes to use a higher sulfur content fuel oil up to 1%.

Another point is that the facility did not apply to use on-spec used oil. Many facilities ask for this operational flexibility.

A future change to the facility permit to allow the use of up to 1.2 million gallons, or of fuel oil with a higher sulfur content, or on-spec used oil would require a new air construction permit application with a $2,500.00 processing fee to take care of the incremental increase in emissions from those of a facility subtype 1D, to those of a facility subtype 1C, a source emitting at least 50 TPY but less than 100 TPY, with an application processing fee of $4500. [Rule 62-4.050(4)(a)2.b., F.A.C.] The new permit would also require a new public notice.

The requirements for testing, recordkeeping and reporting are the same for both facility subtypes.

You stated you were comfortable with the application as it was submitted for the fuel oil use amount and sulfur content. If you should decide to go with the higher limits, we will need to make the changes before the required public notice for this project is published. We can make the necessary changes to the draft permit documents upon receipt of revised air construction permit application pages and calculations and the incremental $2,500.00 processing fee.

Adding the on-spec used oil will not require an additional fee. Just let me know by email if you wish to add the on-spec used oil capability before you publish the public notice and we can coordinate this with Ms Hitchcock.

If you have any questions, please contact me by e-mail or at 850.595.0639

Regards,
Armando I. Sarasua, P.E.
Permitting Supervisor, Air Program, Northwest District
Florida Department of Environmental Protection
160 Governmental Center, Suite 308 Pensacola, Florida 32502-5794
850 595 0639, vox 850 595 8096 fax Armando.Sarasua@dep.state.fl.us

Please note: Florida has a very broad public records law. Most written communications to or from state officials are public records and may be made available to the public or media upon request. This e-mail communication, your reply, and future e-mails to my attention may therefore be subject to public disclosure.

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.

Curle, Mary Beth

From: Cody Rawson [crawson@roadsinc.com]
Sent: Tuesday, October 09, 2012 1:01 PM
To: Curle, Mary Beth
Subject: Re: DEP Air Program Intent to Issue Permit 7775744-001-AC; Roads, Inc.; Cantonment Asphalt Plant

Sent from my iPhone

On Oct 9, 2012, at 12:20 PM, "Curle, Mary Beth" <Mary.Beth.Curle@dep.state.fl.us> wrote:

> Dear Sir/Madam:
> Please verify receipt of the attached document by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send." Your reply will preclude subsequent e-mail transmissions to verify receipt of the document.
> The document may require action within a specified time frame. Please open and review as soon as possible.
> The document is in "pdf" format. Adobe Acrobat Reader can be downloaded for free at: http://www.adobe.com/products/acrobat/readstep.html. When printing the document, select "Document and comments" from the "Print What:" menu item; if this is not done the signature may not appear on the printed document. Please advise this office of any changes to your e-mail address. Thank you.
> Please be advised that if you have anti-virus software, a warning may appear when you attempt to open our document. This is only a warning. We send our documents virus-free.
>
>
>
> Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey<http://survey.dep.state.fl.us/?refemail=Mary.Beth.Curle@dep.state.fl.us>.
> <Roads Inc Intent to Issue Permit 7775744-001-AC.pdf> <Roads Inc
> 7775744-001-AC notice for publication.doc>

Curle, Mary Beth

From: Debbie Hitchcock [dhitchcock@ascendantllc.net]
Sent: Tuesday, October 09, 2012 12:59 PM
To: Curle, Mary Beth
Subject: RE: DEP Air Program Intent to Issue Permit 7775744-001-AC; Roads, Inc.; Cantonment Asphalt Plant

Received – thank you!

Debbie Hitchcock, PE
Ascendant Solutions, LLC
2019 N 12th Ave
Pensacola, FL 32503
Cell: (850) 232-8871
Email: dhitchcock@ascendantllc.net
www.ascendantsolutionsllc.com

ASCENDANT SOLUTIONS, LLC

From: Curle, Mary Beth [mailto:Mary.Beth.Curle@dep.state.fl.us]
Sent: Tuesday, October 09, 2012 12:20 PM
To: crawson@roadsinc.com
Cc: Debbie Hitchcock; Bradburn, Rick; Sarasua, Armando; Melton, Carol; Ard, Howard
Subject: DEP Air Program Intent to Issue Permit 7775744-001-AC; Roads, Inc.; Cantonment Asphalt Plant

Dear Sir/Madam:

Please verify receipt of the attached document by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send." Your reply will preclude subsequent e-mail transmissions to verify receipt of the document.

The document may require action within a specified time frame. Please open and review as soon as possible.

The document is in "pdf" format. Adobe Acrobat Reader can be downloaded for free at: http://www.adobe.com/products/acrobat/readstep.html. When printing the document, select "Document and comments" from the "Print What:" menu item; if this is not done the signature may not appear on the printed document. Please advise this office of any changes to your e-mail address. Thank you.

Please be advised that if you have anti-virus software, a warning may appear when you attempt to open our document. This is only a warning. We send our documents virus-free.

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.

FILE COPY

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Northwest District
160 W Government St., Suite 308
Pensacola, Florida 32502-5740

RICK SCOTT
GOVERNOR

JENNIFER CARROLL
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

October 9, 2012

Mr. Cody Rawson, President
Roads, Inc.
106 Stone Boulevard
Cantonment, Florida 32533

Re: Project No. 7775744-001-AC
Roads, Inc., Cantonment Asphalt Plant
Minor Source Air Construction Permit
New Hot-Mix Asphalt Concrete Plant

Dear Mr. Rawson:

On September 19, 2012, you submitted an application requesting to construct a new Hot-Mix Asphalt Concrete Plant. This facility will be located in Escambia County at 15 Becks Lake Road in Cantonment, Florida. Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and, the Draft Permit and Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the project engineer, Howard Ard, at 850.595.0622 or howard.ard@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator
Northwest District Office

Enclosures

RB/ha/c

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:

Roads, Inc.
106 Stone Boulevard
Cantonment, Florida 32533

Authorized Representative:
Cody Rawson, President

Project No. 7775744-001-AC
Minor Source Air Construction Permit
Escambia County, Florida

Plant Name: Cantonment Asphalt Plant
Project: New Hot-Mix Asphalt Concrete Plant

Facility Location: Roads, Inc. proposes to construct a new Asphalt Concrete Plant to be located in Escambia County at 15 Becks Lake Road in Cantonment, Florida.

Project: The applicant proposes to construct a new Hot-Mix Asphalt Concrete Plant with a baghouse. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210, and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Section in the Northwest District Office. The Permitting Authority's physical address and mailing address is: 160 W Government Street, Suite 308, Pensacola, Florida 32502-5740. The Permitting Authority's telephone number is 850.595.8300.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S). Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within seven days of publication. Proof of publication of notice is made by furnishing a uniform affidavit in substantially the form prescribed in Section 50.051 of the Florida Statutes, to the office of the Department issuing the permit. Proof of publication may be submitted electronically to nwdair@dep.state.fl.us. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850.245.2241). Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this Written Notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this Written Notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Written Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Pensacola, Florida.

Rick Bradburn

Rick Bradburn
Air Program Administrator
Northwest District Office

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) 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 October 9, 2012 to the persons listed below.

Cody Rawson; Roads, Inc.: crawson@roadsinc.com
Debra J. Hitchcock, P.E.; Ascendant Solutions, LLC: dhitchcock@ascendantllc.net

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.

MB Curle

(Clerk) 10/9/12 (Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Air Resource Section, Northwest District Office
Draft Minor Source Air Construction Permit
Project No. 7775744-001-AC
Roads, Inc., Cantonment Asphalt Concrete Plant
Escambia County, Florida

Applicant: The applicant for this project is Roads, Inc. The applicant's authorized representative and mailing address is: Mr. Cody Rawson, President, Roads, Inc., 106 Stone Blvd, Cantonment FL 32533.

Facility Location: Roads, Inc. proposes to construct a new Asphalt Concrete Plant to be located in Escambia County at 15 Becks Lake Road in Cantonment, Florida.

Project: The applicant proposes to construct a new 300 ton per hour Hot-Mix Asphalt Concrete Plant. Particulate matter emissions will be controlled by a baghouse. The plant will burn primarily natural gas, but may burn fuel oil. Emissions will be limited by restricting asphalt production and limiting fuel oil consumption and fuel oil sulfur content. This facility will be regulated under Rule 62-210.300(3)(c)2., F.A.C. (Conditional Exemptions from Title V Permitting) and New Source Performance Standards - 40 CFR 60, Subpart I (Standards of Performance for Hot Mix Asphalt Facilities).

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Department of Environmental Protection's Air Resource Section in the Northwest District Office. The Permitting Authority's physical and mailing address is: 160 W Government Street, Suite 308, Pensacola, Florida 32502-5740. The Permitting Authority's telephone number is 850.595.8300.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: http://www.dep.state.fl.us/air/emission/apds/default.asp.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S., or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of this Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for

an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850.245.2241). Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of this Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address and telephone number of the petitioner; the name address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial rights will be affected by the agency determination; (c) A statement of when and how the petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

(Public Notice to be Published in the Newspaper)

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Roads, Inc.
106 Stone Boulevard
Cantonment, Florida 32533

Cantonment Asphalt Concrete Plant
Facility ID No. 7775744

PROJECT

Project No. 7775744-001-AC
Application for Minor Source Air Construction Permit
New Hot-Mix Asphalt Concrete Plant

COUNTY

Escambia, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Northwest District Office
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740

October 9, 2012

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Roads, Inc. proposes to construct a new synthetic minor facility, a relocatable asphalt concrete plant, which is categorized under Standard Industrial Classification Code No. 2951, Asphalt Paving Mixtures and Blocks. The new facility will be located in Escambia County at 15 Becks Lake Road in Cantonment, Florida. The UTM coordinates of the new facility are Zone 16, 469.51 km East, and 3386.67 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

This new asphalt concrete plant will be built across Stone Boulevard from the existing Roads, Inc. Cantonment Asphalt Plant (Facility ID 7775285), which will be decommissioned when the new asphalt plant begins operation.

Facility Regulatory Categories

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

Project Description

This project will construct a new 300 TPH Hot-Mix relocatable Asphalt Concrete Plant with a baghouse, an aggregate feed system, a drum dryer, two electrically heated asphalt cement storage tanks and three electrically heated asphalt product storage silos. The primary source of fuel for the asphalt plant will be natural gas; however, the facility may burn No.2 and No. 4 fuel oil.

Aggregate will be brought on site by trucks and stored in piles. A relocatable RAP crushing system, under an Air General Permit, may be operated at the facility periodically to provide RAP for the asphalt mix.

Processing Schedule

September 19, 2012 Received the application for a minor source air pollution construction permit.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C., for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	Potential Emissions	Proposed Project Potential Emissions	PSD Major Threshold	Significant Emissions Rate	Subject To PSD?
CO	None - new	32.5	250	100	No
NO_X	None - new	13.75	250	40	No
PM_{total}/ PM_{10}	None - new	8.25/5.75	250	25	No
SO_2	None - new	49.5	250	40	No
VOC	None - new	8.0	250	40	No
HAP (Combined)		1.9			
Formaldehyde		0.19			

Emission factors for PM_{total} and PM_{10} are from AP-42, Table 11.1-3 (Baghouse with fabric filter). Emission factors for NOx and CO are from AP-42, Table 11.1-7. The emission factor for VOC is from AP-42 Table 11.1-8, and the emission factor for SO_2 is from AP-42, Table 1.3-1.

This is a new facility. The PSD major stationary source threshold for this type of facility is 250 TPY of a regulated pollutant. As shown in the above table, the potential emissions increases alone from the proposed project itself do not equal or exceed the PSD major stationary source thresholds for this type of facility. Based on these facts it is determined that the project is not subject to PSD preconstruction review.

3. APPLICATION REVIEW

Application Fee

This is an AC/1D ($2,000.00 fee) for a source of emissions more than 25 but less than 50 tons per year.

Normally this type of facility would be classified as AC/1C ($4,500.00 fee) for a source of emissions more than 50 but less than 100 tons per year, but applicant took restrictions on fuel usage and fuel oil sulfur content to remain under 50 TPY.

Discussion of Emissions

Potential emissions are calculated based on regulated activities associated with asphalt production, and include both fugitive production-related emissions, resulting from the transport of asphalt concrete from drum mix to storage silo and from silo to loading operations, and ducted process emissions generated during product manufacturing. Fugitive emissions from yard storage piles and vehicular traffic are not included in the estimate of potential emissions.

State Requirements

This emissions unit is regulated under Rule 62-210.300(3)(c)2., F.A.C. (Conditional Exemptions from Title V Permitting). The facility is conditionally exempt from Title V permitting with annual throughput limited to 500,000 tons of asphalt concrete per year. The applicant requested fuel oil consumption be limited to 1.1 million gallons in any consecutive 12-month period and the sulfur content of the fuel oil to not exceed 0.6 percent, by weight, as compared to Rule 62-210.300(3)(c)2 requirements of 1.2 MMGal and 1%. To ensure that the facility remains a Non-Title V facility, the above-mentioned facility-wide limits shall also include the periodically operated portable RAP crusher.

Federal NSPS Provisions

This emissions unit is subject to NSPS - 40 CFR 60, subpart I (Standards of Performance for Hot Mix Asphalt

Facilities).

Federal NESHAP Provisions

Not Applicable.

Other Draft Permit Requirements

There are no additional draft permit requirements.

4. PRELIMINARY DETERMINATION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Howard Ard is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer, Howard Ard, at 850.595.0622 or howard.ard@dep.state.fl.us.

*** DRAFT PERMIT ***

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Roads, Inc.
106 Stone Boulevard
Cantonment, Florida 32533

Authorized Representative:
Cody Rawson, President

Air Permit No. 7775744-001-AC
Permit Expires:

Plant Name: Cantonment Asphalt Concrete Plant
Minor Source Air Construction Permit
Project Name: New Hot-Mix Asphalt Concrete Plant

This is the final air construction permit, which authorizes the construction of a new Hot-Mix Asphalt Concrete Plant. The proposed work will create a new asphalt concrete manufacturing facility (Standard Industrial Classification No. 2951). The facility will be located in Escambia County at 15 Becks Lake Road in Cantonment, Florida. The UTM coordinates are Zone 16, 469.51 km East, and 3386.67 km North. As noted in the Final Determination provided with this final permit, (no changes / only minor changes and clarifications) were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit 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.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not 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, 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.

Complete draft permit not printed for file – 24 pages MSC