



# Florida Department of Environmental Protection

Southwest District  
13051 N. Telecom Parkway  
Temple Terrace, Florida 33637-0926

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

## FINAL PERMIT

### PERMITTEE

Suncoast Paving, Inc.  
800 Anclote Road  
Tarpon Springs, FL 34689

Authorized Representative:  
Mr. William Camm II, Vice President

Air Permit No. 1030044-007-AC  
Permit Expires: 09/29/2014  
Site Name : Tarpon Springs Facility  
Minor Air Construction Permit  
Project Name: Replacement of Wet  
Scrubber with Pulse Jet Baghouse

This is the final air construction permit, which authorizes the installation of a pulse jet baghouse which will replace the existing venturi wet scrubber system. The proposed work will be conducted at the Tarpon Springs Facility (Standard Industrial Classification No. 2951). The facility is located in Pinellas County at 800 Anclote Road in Tarpon Springs, Florida. The UTM coordinates are Zone 17, 326.0 km East, and 3116.7 km North.

This draft 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 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.

Executed in Hillsborough County, Florida

Mara Grace Nasca September 29, 2009  
Mara Grace Nasca Effective Date  
District Air Program Administrator  
Southwest District

### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 09-30-2009 to the persons listed below.

Mr. William Camm II, Suncoast Paving, Inc. (bill@suncoastpaving.com)

Mr. Lynn Robinson, P.E., Southern Environmental Sciences, Inc. (lrobinson@sesfla.com)

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.

 09-30-2009  
(Clerk) (Date)

Suncoast Paving, Inc.  
Tarpon Springs Facility

Air Permit No. 1030044-007-AC  
Project Name: Replacement of Wet  
Scrubber with Pulse Jet Baghouse

## SECTION 2. GENERAL INFORMATION (FINAL)

### FACILITY AND PROJECT DESCRIPTION

#### Suncoast Paving, Inc.

The existing facility operates a Littleford, Inc., Model 123-80 hot-mix asphalt batch plant having a maximum permitted process rate of 100.0 tons/hour. The facility is permitted to process a conventional surface mix (virgin) asphalt pavement. The asphalt plant dryer burner, a Hauck/Starjet, Model SJO-260 is fired with "on-specification" No. 5 reclaimed fuel oil having a sulfur content not to exceed 1.0%, by weight as primary fuel. The back-up fuel is new virgin No. 5 blend fuel oil having a sulfur content not to exceed 1.0%, by weight. Emissions are controlled by a 10' diameter dry cyclone separator followed by a venturi wet scrubber system. This facility does not process RAP. The existing facility consists of the following emissions units.

Facility ID No. 1030044	
ID No.	Emission Unit Description
001	Hot-Mix Asphalt Batch Plant

#### Project Description and Affected Emission Units

This permit modifies Air Construction Permit No. 1030044-003-AC for the replacement of the venturi wet scrubber system with a nominal 40,000 acfm pulse jet baghouse manufactured by AeroPulse, LLC. Electricity is used for all oil heating systems at this facility and are closed systems allowing no emissions. This facility was reviewed to determine if it were subject to 40 CFR 60 NSPS Subpart I, Standards of Performance for Hot Mix Asphalt Facilities. Since the equipment at the facility was constructed prior to the Subpart I applicability trigger date of 06/11/73, it is not subject to the requirements of this subpart. This project will modify the following emissions units.

Facility ID No. 1030044	
ID No.	Emission Unit Description
001	Hot-Mix Asphalt Batch Plant

**NOTE:** Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.

### FACILITY REGULATORY CLASSIFICATION

- 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 (CAA).
- 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(PSD), F.A.C.
- This facility is a synthetic non-Title V source for particulate matter less than 10 microns (PM<sub>10</sub>), SO<sub>2</sub>, CO, NO<sub>x</sub>, hazardous air pollutants (HAPs).

### PERMIT HISTORY/AFFECTED PERMITS

**Modifies Permit No.:** 1030044-003-AC

Suncoast Paving, Inc.  
Tarpon Springs Facility

Air Permit No. 1030044-007-AC  
Project Name: Replacement of Wet  
Scrubber with Pulse Jet Baghouse

## SECTION 2. GENERAL INFORMATION (FINAL)

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1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District's Air Resource Management Section. The Southwest District's mailing address and phone number is:

Florida Department of Environmental Protection  
Southwest District Office  
Air Resource Management Section  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

All documents related to applications for permits to operate an emissions unit shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Pinellas County Department of Environmental Management, Air Quality Division. The mailing address and phone number is:

Pinellas County Department of Environmental Management  
Air Quality Division  
300 South Garden Avenue  
Clearwater, Florida 33756  
Telephone: 727-464-4422

3. Appendices: The following Appendices are attached as part of this permit:

- a. Appendix A. Citation Formats and Glossary of Common Terms;
- b. Appendix B. General Conditions;
- c. Appendix C. Common Conditions; and
- d. Appendix D. Common Testing Requirements.

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 and 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. 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.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control

## SECTION 2. GENERAL INFORMATION (FINAL)

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device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.  
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority. The sulfur dioxide emissions from using fuel oil when producing asphalt product shall be determined using the US EPA's document AP-42, Table 1.3-1 and a reduction of 0.1 lbs. of sulfur dioxide for each ton of asphalt product produced.  
[Rules 62-4.070(3) and 62-210.370(3), F.A.C.]
8. Application for Non-Title V Air Operation Permit Revision: This permit authorizes modification of the permitted emissions unit and initial operation of the newly installed baghouse to determine compliance with Department rules. A Non-Title V air operation permit revision is required for continued operation of the permitted emissions unit. The permittee shall apply for a Non-Title V air operation permit revision at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. To apply for a Non-Title V air operation permit revision, the applicant shall submit the following:
  - a. the appropriate permit application form (*see current version of Rule 62-210.900, F.A.C. (Forms and Instructions)*), and/or FDEP Division of Air Resource Management website at: <http://www.dep.state.fl.us/air/>;
  - b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;
  - c. a copy of the initial compliance test report(s) required by Specific Condition No. A.6., if not previously submitted;
  - d. copies of the most recent two months of records/logs specified in Specific Condition No. A.15. and
  - e. the baghouse Operation and Maintenance (O & M) Plan required by Specific Condition No. A.17.

The application shall be submitted to the Permitting Authority with a copy to Pinellas County Department of Environmental Management, Air Quality Division.

[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

#### A. EU No. 001 Hot-Mix Asphalt Batch Plant

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Hot-Mix Asphalt Batch Plant

#### PERFORMANCE RESTRICTIONS

- A.1. Permitted Capacity: The maximum daily average and annual production of asphalt concrete shall not exceed 100 tons/hr and 500,000 tons/yr, respectively.  
[Rule 62-210.200(PTE), F.A.C. and Construction Permit No. 1030044-003-AC]
- A.2. Authorized Fuel: The permittee shall only burn "on-specification" no. 5 reclaimed fuel oil and no. 5 virgin blend fuel oil at a maximum fuel consumption rate of 1.2 million gallons per any consecutive 12-month period. The sulfur content of all fuel oils shall not exceed 1.0%, by weight.  
[Rule 62-210.300(3)(c)2.b., F.A.C.]
- A.3. Restricted Operation: The hours of operation are limited to 3,120 hours per year.  
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; Construction Permit No. 1030044-003-AC]

#### EMISSIONS STANDARDS

- A.4. Particulate Matter (PM) Emission Limitation: Particulate matter emissions from the asphalt plant's baghouse shall not exceed 0.06 gr/dscf.  
[Rule 62-296.704(2), F.A.C.] (*Permitting Note: Based on a design airflow rate of 40,000 dscfm and 3,120 hrs./yr., the equivalent PM emissions are 20.6 lbs/hr and 32.1 tpy.*)
- A.5. Visible Emission (VE) Limitation: Visible emissions from the asphalt plant's baghouse shall not be equal to or greater than 20% opacity.  
[Rule 62-296.704(2), F.A.C.]

#### TESTING REQUIREMENTS

- A.6. Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for particulate matter and visible emissions. The initial tests shall be conducted not later than sixty (60) days after initial operation of the baghouse.  
[Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]
- A.7. Compliance Tests: During each federal fiscal year (October 1<sup>st</sup> - September 30<sup>th</sup>), the emissions unit shall be tested to demonstrate compliance with the emissions standards for particulate matter and visible emissions.  
[Rule 62-297.310(7)(a)4., F.A.C.]
- A.8. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit, when on-specification no. 5 used oil is used in the asphalt concrete production. If virgin no. 5 fuel oil is used during a compliance test, the facility is limited to burn virgin no. 5 fuel oil only. Once the facility is so limited, operation with on-specification no. 5 fuel oil is allowed for no more than

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

#### A. EU No. 001 Hot-Mix Asphalt Batch Plant

400 hours, until a compliance test with on-specification no. 5 used oil is successfully completed.

[Rule 62-297.310(7)(a)9., F.A.C.]

- A.9. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5 or 5A	Determination of Particulate Matter Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.

[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

- A.10. Fuel Analysis Requirements: For each delivery of "on-specification" reclaimed/used fuel oil, the vendor shall provide an analysis documenting the fuel oil meets the following requirements of 40 CFR 761.20(e)(2) and (3) and 40 CFR 279.11 [July 1, 2004]:

Constituent/Property	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm <sup>1</sup> maximum
Flash Point	100 degrees F minimum
PCB's	Shall be less than 2 ppm

[Rules 62-4.070(3) and 62-710.210, F.A.C.]

#### NOTIFICATION REQUIREMENTS

- A.11. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

*{Permitting Note: The notification should also include the relevant emission unit ID No(s), test method(s) to be used, and pollutants to be tested.}*

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

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### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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#### A. EU No. 001 Hot-Mix Asphalt Batch Plant

- A.12. Notification of Operation Commencement: The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the new pulse jet baghouse, no later than five (5) business days after that date.  
[Rule 62-4.070, F.A.C.]

#### RECORDS AND REPORTS

- A.13. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. The following information for the test period shall be submitted with any compliance test report:
- A. Production rate of hot-mix asphalt concrete in tons/hr.
  - B. Type and amount of fuel used (on-specification no. 5 used oil or virgin no. 5 fuel oil).
  - C. Fuel oil analysis of the sulfur content of the fuel oil used.
  - D. Used fuel oil analysis to document compliance with the on-specification used oil limits, if on-specification no.5 reclaimed fuel oil was used to fire the dryer.
  - E. Average pressure drop across the baghouse during the test runs.
  - F. A copy of the log the day the test was conducted and the monthly log for the month the test was conducted.

Failure to submit the items mentioned above with any compliance test report for the test period may invalidate the test(s).

[Rules 62-4.070(3) and Rule 62-297.310(8), F.A.C.]

- A.14. Fuel Sulfur Content: In order to document continuing compliance with the sulfur content limitations of 1.0%, by weight, of the fuel oil used in the asphalt concrete plant's dryer, the permittee shall keep records on either vendor provided as-shipped analysis or on analysis of as-received samples taken at the plant. The analysis shall be determined by appropriate ASTM methods.
- A.15. Daily and Monthly Log: In order to demonstrate compliance with Specific Condition A.1., A.2., and A.3., the permittee shall comply with the following recordkeeping requirements:
- A. Daily records - Daily record the following:
    - 1. Date
    - 2. The pressure drop across the baghouse during normal operation, in inches of water.
    - 3. Total asphalt concrete production, in tons, of virgin/conventional asphalt concrete.
    - 4. Hours of producing virgin/conventional asphalt concrete.
    - 5. Daily average production rate of asphalt concrete produced, in tons/hr. of virgin/conventional asphalt concrete.
  - B. Monthly Records - Monthly record the following:
    - 1. Month/Year
    - 2. Total tons of virgin/conventional asphalt concrete produced, and calculate and record the most recent combined consecutive 12 month rolling total, in tons.



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### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS (FINAL)

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#### A. EU No. 001 Hot-Mix Asphalt Batch Plant

3. Total operating hours of the asphalt batch plant's dryer along with a consecutive 12 month rolling total, in hours.
4. The quantity of each of the 2 types of fuel used to fire the asphalt concrete plant's dryer.
5. The quantity of both types of fuel oil used in the most recent consecutive 12-month period.

Daily records shall be completed within three (3) business days and monthly records shall be completed by the end of the following month.

[Rule 62-4.070(3), F.A.C.]

- A.16. Record Retention: All records shall be maintained at the facility for a minimum of 5 years and made available to the Air Compliance Section of the Southwest District of the Department and the Pinellas County Department of Environmental Management, Air Quality Division upon request.

[Rules 62-4.070(3) and 62-210.300(3)(c)2.g., F.A.C.]

- A.17. Operation and Maintenance (O & M) Plan for Particulate Matter Control: For air pollution control devices and collection systems, the permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection of each control device, collection systems, and auxiliary equipment. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained by the emissions unit for a minimum of two (2) years and shall be made available to the Compliance Authority upon request. The performance parameters shall include operating rates and efficiencies. Such parameters and records shall include, at a minimum, that shown below.

- a. Performance Parameters: The plan shall include the parameters and information specified by Pinellas County Code 58-128, 62-296.700(6)(a)(2), F.A.C. and 62-296.700(6)(b), F.A.C. where applicable and shall be submitted with the operation permit revision application noted in Specific Condition No. 8 to the Pinellas County Department of Environmental Management, Air Quality Division for approval.
- b. Operation and Maintenance Log: A record log which will indicate at a minimum:
  - i. When maintenance and observations were performed.
  - ii. What maintenance and observations were performed.
  - iii. Who performed said maintenance.

[Rule 62-4.070(3), F.A.C. and Pinellas County Code No. 58-128]