

Check Sheet

Company Name: *Dickerson Asphalt*
Permit Number: *AC 10-22330*
PSD Number:
County: *Clay*
Permit Engineer:
Others involved:

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Final Application (if applicable)
- Waiver of Department Action
- Department Response

Intent:

- Intent to Issue
- Notice to Public
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Attachments:

-
-
-
- Correspondence with:
 - EPA
 - Park Services
 - County
 - Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination

Post Permit Correspondence:

- Extensions
- Amendments/Modifications
- Response from EPA
- Response from County
- Response from Park Services

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

December 3, 1979

CERTIFIED MAIL

Mr. William B. Lindler, Vice President
Dickerson Incorporated
P. O. Box 40949
Jacksonville, Florida

Dear Mr. Lindler:

Enclosed is Permit Number AC 22330, dated December 5, 1979,
to Dickerson Incorporated
issued pursuant to Section 403, Florida Statutes.

Should you object to this permit, including any and all of the conditions contained therein, you may file an appropriate petition for administrative hearing. This petition must be filed within fourteen (14) days of the receipt of this letter. Further, the petition must conform to the requirements of Section 28-5.15, Florida Administrative Code, (see reverse side of this letter). The petition must be filed with the Office of General Counsel, Department of Environmental Regulation, Twin Towers Office Building, 2600 Blair Stone Road, Tallahassee, Florida 32301.

If no petition is filed within the prescribed time, you will be deemed to have accepted this permit and waived your right to request an administrative hearing on this matter.

Acceptance of the permit constitutes notice and agreement that the Department will periodically review this permit for compliance, including site inspections where applicable, and may initiate enforcement action for violation of the conditions and requirements thereof.

Sincerely,

Steve Smallwood
Acting Bureau Chief
Bureau of Air Quality Management

Enclosure

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

- (1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.
- (2) All petitions filed under these rules should contain:
 - (a) The name and address of each agency affected and each agency's file or identification number, if known;
 - (b) The name and address of the petitioner or petitioners;
 - (c) All disputed issues of material fact. If there are none, the petition must so indicate;
 - (d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;
 - (e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;
 - (f) A demand for the relief to which the petitioner deems himself entitled; and
 - (g) Such other information which the petitioner contends is material.

Final Determination

Dickerson Inc.
Asphalt Batch Plant
Clay County, Florida

Construction Permit

Application Number:

AC 22330

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

December 5, 1979

Dickerson Inc. - Clay County Asphalt Batch Plant Final Determination

The construction permit application for a portable asphalt batch plant of Dickerson Inc. to be located in Clay County has been reviewed by the Bureau. Public notice of the Department's intent to issue was published in the Florida Times Union on October 31, 1979. Copies of the preliminary determination and technical review were available for public inspection at the Duval County Bio-Environmental Services Division, the DER St. Johns River Subdistrict Office and the Bureau of Air Quality Management.

No comment has been received regarding this public review. Therefore, it is requested that this construction permit be issued.



SHOLTSES & KOOGLER, ENVIRONMENTAL CONSULTANTS
1213 N.W. 6th Street Gainesville, Florida 32601 (904) 377-5822

SKEC 109-79-01



Mr. Walter E. Starnes
Florida Department of Environmental Regulation
Bureau of Air Quality Management
Twin Towers Building
2600 Blair Stone Road
Tallahassee, FL 32301

Reference: Permit AC22330
Dickerson, Inc.
Clay County, Florida Asphalt Plant

Dear Walt:

I would like to confirm our conversation of this date regarding one of the specific permit conditions attached to the referenced permit. The condition I would like to address is Specific Condition No. 1: Particulate Matter-3.4 pounds per hour not exceeding 0.04 grains per SCDF.

The mass emission rate of 3.4 pounds particulate matter per hour is not consistent with the particulate matter concentration of 0.04 grains per SCDF and the gas flow rate that can be expected from the plant. The 3.4 pounds per hour was taken from Page 3 of the Permit Application (Section III, Part C). In this section information is requested on the maximum hourly pollutant emission rate and the actual annual pollutant emission rate. The section further references Section IV, Item 2 which requires that the applicant attach a basis of emission estimates.

In filling out applications for construction permits, it has always been my policy to enter the best estimate of actual pollutant emission rates in Section III, Item C. This is what the 3.4 pounds per hour represents - the best estimate of the maximum hourly particulate matter emission rate. This estimate was based upon test data provided to Dickerson, Inc., by the supplier of the asphalt batch plant.

The allowable particulate matter emission rate, based on 0.04 grains per SCDF and the design air flow rate is 5.02 pounds per hour. This number is entered in Section III, Item C, Column 4. The emission rate of 5.02 pounds per hour was also used in estimating the impact of the proposed source on ambient air quality (Section VII of the Permit Application).

Mr. Walter E. Barnes
Florida Dept. Env. Regulation
November 8, 1979
Page two

By this letter, I am requesting that the first specific condition of Air Pollution Construction Permit AC22330 be changed to allow a particulate matter emission rate of 5.0 pounds per hour not exceeding 0.04 grains per SCDF. This mass emission rate is consistent with the particulate matter concentration which was determined to be BACT and is the emission rate the plant can routinely be expected to comply with.

If further information is required, or if modifications to the Permit Application are necessary to accomplish this change, I will be glad to arrange whatever is necessary to accomplish this. Thank you for your attention to this matter.

Very truly yours,

SHOLTES & KOOGLER
ENVIRONMENTAL CONSULTANTS


John B. Koogler, Ph.D., P.E.

JBK:sc

cc: Mr. William B. Lindler
Mr. Steve Smallwood ✓
Ms. Mary Clark

The Florida Times-Union



Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

Before the undersigned authority personally appeared _____

Ronald W. Keeler, who on oath says that he is

Advertising Manager of The Florida Times-Union, and

Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,

Florida; that the attached copy of advertisement, being a _____

Legal Notice

in the matter of **Portable Asphalt Batch Plant**

in the _____ Court,

was published in **The Florida Times Union**,

in the issues of **November 1, 1979**

Date Invoice Rec'd. 11-5-79 By: [Signature]
Date Goods Services Rec'd. _____ By: _____
Date Goods Inspected / App'd. _____ By: _____

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

Sworn to and subscribed before me
this 1st day of Nov

1979 A.D.

[Signature]
Notary Public,
State of Florida at Large.

My Commission Expires _____
Notary Public, State of Florida at Large

Ronald W Keeler

Bonded By American Fire & Casualty Company.

Judith Royane
0444
2920
2119

CONSTRUCTION NOTICE
The Department of Environmental Regulation (DER) has an application from and intends to issue a Construction Permit to Dickerson, Inc. for a Portable Asphalt Batch Plant, to be located on U.S. Highway 301, 2.65 Miles South of SR 228, in Clay County. No determination of Best Available Control Technology was required. Copies of the application, DER's Technical Evaluation and proposed decision are available for inspection at the following offices:
DER, Bureau of Air Quality Mgt
2600 Blair Stone Rd., Tallahassee
Bio Environment Services
515 W Sixth St., Jacksonville
DER, 3426 Bills Rd., Jacksonville
Persons wishing to comment on this action shall submit comments in writing to Mr. Bill Thomas of the Tallahassee office within 30 days of this notice.

The Florida Times-Union



Jacksonville Journal

FLORIDA PUBLISHING COMPANY

Publishers

JACKSONVILLE, DUVAL COUNTY, FLORIDA

STATE OF FLORIDA }
COUNTY OF DUVAL }

John Rogers
0444
2920
2119

Before the undersigned authority personally appeared _____
Ronald W. Keeler _____, who on oath says that he is
Advertising Manager _____ of The Florida Times-Union, and
Jacksonville Journal, daily newspapers published at Jacksonville in Duval County,
Florida; that the attached copy of advertisement, being a _____

Legal Notice

in the matter of Portable Asphalt Batch Plant

in the _____ Court,
was published in The Florida Times Union,
in the issues of November 1, 1979

Date Invoice Rec'd. 11-5-79 By: ymw
Date Goods Services / Rec'd. _____ By: _____
Date Goods Inspected / App'd. _____ By: _____

CONSTRUCTION NOTICE
The Department of Environmental Regulation (DER) has an application from and intends to issue a Construction Permit to Dickerson, Inc. for a Portable Asphalt Batch Plant, to be located on U.S. Highway 301, 2.65 Miles south of SR 228, in Clay County. No determination of Best Available Control Technology was required. Copies of the application, DER's Technical Evaluation and proposed decision are available for inspection at the following offices:
DER, Bureau of Air Quality Mgt
2600 Blair Stone Rd., Tallahassee
Bio Environment Services
515 W Sixth St., Jacksonville
DER, 3426 Bills Rd., Jacksonville
Persons wishing to comment on this action shall submit comments in writing to Mr. Bill Thomas of the Tallahassee office within 30 days of this notice.

Affiant further says that the said The Florida Times-Union and Jacksonville Journal are each newspapers published at Jacksonville, in said Duval County, Florida, and that the said newspapers have each heretofore been continuously published in said Duval County, Florida, The Florida Times-Union each day, and Jacksonville Journal each day except Sundays, and each has been entered as second class mail matter at the postoffice in Jacksonville, in said Duval County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in said newspaper.

DER
NOV 2 1979
PURCHASING

Sworn to and subscribed before me
this 1st day of
November A.D. 19 79
Thomas J. Berg
Notary Public,
State of Florida at Large
My Commission Expires July 9, 1982
Bondered By American Fire & Casualty Company

Ronald W Keeler

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



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BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

The Florida Times - Union
P. O. Box 1949
Jacksonville, FL 32201

10/26/79

Dear Sir:

Re: Legal Advertisement ()
Classified Advertisement ()

We are forwarding to you a legal advertisement to be published on the following date (s):

Nov 4, 1979
(one time only)

Subject Construction Notices

To ensure prompt payment, please send an invoice and one proof of publication, when applicable, to the address below:

Department of Environmental Regulation
PURCHASING OFFICE
2600 Blair Stone Road
Tallahassee, Florida 32301

If you have question, please contact us at 904/488-0870.

Sincerely,

Bill Halloran
for Oscar A. Martinez, Director
Purchasing Office

Enclosure: (1)

CONSTRUCTION NOTICE

The Department of Environmental Regulation (DER) has an application from and intends to issue a Construction Permit to Dickerson, Inc. for a Portable Asphalt Batch Plant, to be located on U.S. Highway 301, 2.65 Miles south of SR 228, in Clay County. No determination of Best Available Control Technology was required. Copies of the application, DER's Technical Evaluation and proposed decision are available for inspection at the following offices.

DER, Bureau of Air Quality Mgt
2600 Blair Stone Rd, Tallahassee

Bio Environment Services
515 W Sixth St., Jacksonville

DER, 3426 Bills Rd, Jacksonville

Persons wishing to comment on this action shall submit comments in writing to Mr. ~~Bill~~ *Walt* of the Tallahassee office within 30 days of this notice.

PUBLIC NOTICE

~~TALLAHASSEE OFFICE~~
~~12-1-81~~

Nov 1 1981

C O N S T R U C T I O N N O T I C E

The Department of Environmental Regulation (DER) has an application from and intends to issue a Construction Permit to Dickerson, Inc. for a Portable Asphalt Batch Plant, to be located on U.S. Highway 301, 2.65 miles south of SR 228, in Clay County. No determination of Best Available Control Technology was required. Copies of the application, DER's Technical Evaluation and proposed decision are available for inspection at the following ~~DER and Jacksonville Bio Environment Services (BES)~~ offices:

DER, Bureau of Air Quality ^{*Mgt*} Management
2600 Blair Stone Road, *Tallahassee*
~~Tallahassee, Florida 32301~~

Bio Environment Services
~~Jacksonville BES~~
515 ~~West~~ Sixth St., *Jacksonville*
~~Jacksonville, Florida 32206~~

DER, 3426 Bills Road, *Jacksonville*
~~Jacksonville, Florida 32207~~

Persons wishing to comment on this action shall submit comments in writing to Mr. Bill Thomas of the Tallahassee office within 30 days of this notice.

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR

JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

MEMORANDUM

TO: Robert Kappelmann, Air Engineer, Jacksonville BES
Doug Dutton, Manager, St. Johns River Subdistrict

FROM: Steve Smallwood *SS*
Bureau of Air Quality Management

DATE: October 26, 1979

SUBJ: Proposed Department Action on Dickerson Asphalt, Inc.,
Application to construct a Portable Asphalt Batch Plant
in Clay County, Florida.

Attached is one copy of the proposed Construction Permit for Dickerson Asphalt, Inc., of Jacksonville, Florida, and one copy of the Department's Technical Evaluation and Preliminary Determination.

Pursuant to 17-2.091 and CFR 51.18 this information is to be maintained on file by your office for public review for 30 days following public notice.

Comments are to be submitted in writing to Mr. Walt Starnes of this office.

ATTACHMENT

SS:caa

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

DICKERSON INC.
CLAY COUNTY, FLORIDA

CONSTRUCTION PERMIT
APPLICATION NUMBER

AC22330

FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
BUREAU OF AIR QUALITY MANAGEMENT

OCTOBER 24, 1979

I. PROPOSED DEPARTMENT ACTION

The Department intends to issue the requested construction permit to Dickerson, Inc. to construct a new portable asphalt batch (Drum Mix) on U.S. Highway 301, 2.65 miles South of SR 228 in Clay County, Florida subject to public comment received as a result of the public notice.

Any person wishing to file comments on this proposed action, may do so by submitting such comments in writing to:

Mr. Walter E. Starnes
Florida Department of Environmental
Regulation
Bureau of Air Quality Management
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

Any comments received prior to December 2, 1979, will be considered and noted in the Department's final determination.

Any person whose substantial interests may be affected by the issuance or denial of this permit may request an administrative hearing by filing a petition for hearing in accordance with the provisions of Chapter 28-5 specifically as set forth in Section 28-5.15. (Copy attached). Such petition is to be filed within 14 days of the date of this notice. Such petition is to be filed with:

Mary Clark
Office of General Counsel
Florida Department of Environmental
Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

II. SUMMARY OF EMISSION AND AIR QUALITY ANALYSIS:

a. The proposed location is in Clay County, Florida which is classified as an "attainment area" for all criteria pollutants including particulate, sulfur dioxide, nitrogen oxides, and volatile organic hydrocarbons, which will be emitted from Dickerson Inc.'s portable asphalt batch plant. However the plant is within the area of influence of the Jacksonville particulate "non-attainment area".

b. The significant sources of particulate, sulfur dioxide, nitrogen oxides, and volatile organic hydrocarbons at this plant are

- Asphalt batch plant (particulate emissions 2.7 tons per year, sulfur dioxide emissions 9.8 tons per year and nitrogen oxide emissions 5.7 tons per year).

- fuel and asphalt storage tanks (volatile organic hydrocarbon emissions 0.6 tons per year).

III. SYNOPSIS OF APPLICATION

a. Name and Address of Applicant:

Dickerson, Inc.
P. O. Box 40949
Jacksonville, Florida 32202

b. Description of Project and Controls:

This project is the construction of a new portable asphalt plant of the drum mix type. This type of plant feeds the asphalt to the dryer thus coating the asphalt and reducing the quantity of dust emitted. The plant will produce 150 tons per hour of asphalt consisting of 93% aggregate and 7% liquid asphalt. Emissions from the dryer mixer containing particulate will be ducted to an Astec Baghouse with 630-14 oz. Nomex bags. This device is expected to remove 99.53% of the particulates produced in the process. Sulfur dioxide emissions will be controlled by the sulfur content of the #2 fuel oil which will be limited to 0.23%. Nitrogen oxide emissions from this facility will require no control since there are no specific emission limiting standards and the quantity is significantly less than 250 tons per year. Emission limitations are not applicable to volatile organic hydrocarbons since the projected emissions from the storage tanks will be far below 250 tons per year.

c. Description of the Process, Proposed Process Rate and Emission Rates:

The proposed facility will operate 8 hours per day for 200 days per year. The operation will utilize 280,000 pounds per hour of aggregate, 20,000 pounds per hour of liquid asphalt, and 2,570 pounds per hour of #2 fuel oil. Three emission points are associated with this process. The emission points are the liquid asphalt and fuel oil storage tanks; and, the dry/mixer. The asphalt and fuel oil storage tanks will emit 0.6 tons per year of uncontrolled volatile organic hydrocarbons. The dryer/mixer has the capability to emit 588 tons per year of particulate on an uncontrolled basis and only 2.7 tons per year with the baghouse. Uncontrolled emissions of nitrogen oxides will amount to 5.7 tons per year. Sulfur dioxide emissions will be maintained at 9.8 tons per year by limiting the sulfur content of the fuel to 0.23%.

IV RULE APPLICABILITY

The proposed plant is to be located within the area or influence of the Jacksonville particulate nonattainment area (see 17-2.13 and 17-2.17(1)). The proposed plant is a major source (see 17-2.02(6)) and 17-2.17(1)(c)2.c.), and is therefore only exempt from the nonattainment rule if reasonable assurance

is provided that it does not have significant impact on the nonattainment area (17-2.17(3)(a)(1)a.(ii)).

The proposed plant is to be located at a distance of more than 5 kilometers from the boundary of the particulate nonattainment area, and therefore is not subject to the fugitive particulate matter provisions of the nonattainment rule (17-2.17), however, the plant is subject to the fugitive particulate matter provisions of 17-2.05 Prohibited Acts.

The proposed plant is also a major emitting facility with respect to particulate (17-2.02(70)) and therefore subject to the PSD provisions of 17-2.04, which subjects the particulate emission to control by BACT (17-2.03).

With respect to sulfur dioxide, the plant is neither a major source or a major emitting facility, nor located within a sulfur dioxide nonattainment area or area of influence. Therefore, the sulfur dioxide emissions are not subject to BACT or LAER, but are subject to a permit condition that would provide reasonable assurance that the ambient standards will not be violated, 17-4 FAC.

The information provided indicates that the plant is not a major emitting facility for nitrogen oxides or volatile organic hydrocarbons. Therefore, the proposed source is not subject to control by BACT (17-2.03, 17-2.02(70)), due to the pollutant quantity, the nonattainment rule due to the proposed location; or PSD (17-2.04) due to the type of pollutant.

V. FINDINGS

1. Based on the data presented in the application and EPA emission factors published in AP-42, the total maximum emissions are projected to be equal to or less than the amounts set forth in the following table.

<u>Pollutant</u>	<u>#/hour</u>	<u>Tons/year*</u>
Particulate	735.00	588
SO ₂	12.30	9.8
NO _x	7.10	5.7
VOC	0.63	0.6

* based on operating schedule

2. The proposed facility is a major particulate emitting facility since it has potential particulate emissions of more than 250 tons per year

3. The proposed facility is not a major emitting facility for sulfur dioxide, nitrogen oxides, and volatile organic hydrocarbons since it is not one of the 28 source categories listed in Definition, 17-2.02(70), and will not have uncontrolled emissions greater than 250 tons per year.

4. Ambient modeling shows that neither the PSD increments nor the ambient air quality standards will be violated by the proposed source. The following table shows the impacts.

Air Quality Impacts

<u>Pollutant</u>	<u>State Air Quality Std.</u>	<u>Class II PSD Increment</u>	<u>Impact Proposed Source</u>
Particulate Annual	60 mg/m ³	19 mg/m ³	0.3 mg/m ³
24-hour	150	37	4.5
SO ₂ Annual	60	20	0.6
24-hour	260	91	11.0
3-hour	1300	512	36.9

5. Reasonable assurance has been provided that ambient air quality standards for hydrocarbons and nitrogen dioxide will not be violated.

6. The installation of the Astec baghouse on the drum/mixer is a reasonable requirement to comply with the provisions of 17-2.03 (BACT), 17-4.23 and federal NSPS to minimize the discharge of particulate matter.

7. The use of #2 fuel oil with a sulfur content of 0.23% is a reasonable requirement to minimize sulfur dioxide emissions pursuant to 17-4.23; and, assure that no ambient violations will occur.

8. Due to the minor potential emissions of other pollutants from the storage tanks and the drum/mixer, it is not reasonable or necessary to require installation of air pollution control devices for these pollutants.

9. Construction should commence and be completed within a reasonable time based on the projections in the application.

10. Construction should reasonably conform to the application submitted.

11. The applicant should report any delays in construction and completion.

12. The actual particulate emissions from the baghouse stack and

the fuel oil sulfur content should be tested using standard test methods prior to the issuance of an operating permit. As part of the operating permit, particulate emissions from the baghouse and fuel quality should be periodically tested. Tests do not need to be required for other emission points or pollutants except for specific tests requested by the Department based on a reasonable belief that the emissions from an uncontrolled emission point are excessive.

13. Upon obtaining an operating permit the applicant should submit periodic reports on the actual operation of the facility.

14. The control of sulfur dioxide emission by regulating fuel sulfur content is a common practice that has been used for many facilities and installations.

15. PSD requirements are satisfied by modeling results submitted with the application.

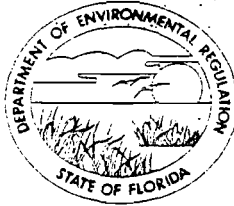
VI. PROPOSED ALLOWABLE EMISSIONS AND PERMIT CONDITIONS

See Draft Permits

Attachment: Rule 28-5

October 24, 1979

2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICANT: Dickerson Inc.
William B. Lindler, V.P.
P. O. Box 40949
Jacksonville, Florida 32203

PERMIT/CERTIFICATION
NO. AC 22330

COUNTY: Clay County

PROJECT: Asphalt Plant

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Chapter 17-2, Florida Administrative Code. The above named applicant, hereinafter called Permittee, is hereby authorized to perform the work or operate the facility shown on the approved drawing(s), plans, documents, and specifications attached hereto and made a part hereof and specifically described as follows:

For the construction of a 150 ton/hr asphalt batch plant to be located in Clay County on U.S. 301, 2.65 miles South of SR 228. The UTMs are 400.700 E. and 3337.120 N and Latitude is 30° 09' 48"N. and Longitude is 82° 01' 51"W.

Construction shall be in accordance with the attached permit application and attached plans, documents and drawings except as otherwise noted on page 3, "Specific Conditions".

Attachments are as follows:

1. "Application to Construct Air Pollution Sources" dated July 25, 1979.
2. Incompleteness letter dated August 23, 1979 to W. B. Lindler.
3. Response to August 23, 1979 letter from John B. Koogler dated September 6, 1979.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions", and as such are binding upon the permittee and enforceable pursuant to the authority of Section 403.161(1), Florida Statutes. Permittee is hereby placed

PERMIT NO.: AC 22330
APPLICANT: Dickerson Inc.
Jacksonville, Florida 32203

on notice that the department will review this permit periodically and may initiate court action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations indicated in the attached drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit shall constitute grounds for revocation and enforcement action by the department.

3. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information: (a) a description of and cause of non-compliance; and (b) the period of non-compliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

4. As provided in subsection 403.087(6), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations.

5. This permit is required to be posted in a conspicuous location at the work site or source during the entire period of construction or operation.

6. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Section 403.111, F.S.

7. In the case of an operation permit, permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

8. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant, or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, except where specifically authorized by an order from the department granting a variance or exception from department rules or state statutes.

9. This permit is not transferable. Upon sale or legal transfer of the property or facility covered by this permit, the permittee shall notify the department within thirty (30) days. The new owner must apply for a permit transfer within thirty (30) days. The permittee shall be liable for any non-compliance of the permitted source until the transferee applies for and receives a transfer of permit.

10. The permittee, by acceptance of this permit, specifically agrees to allow access to permitted source at reasonable times by department personnel presenting credentials for the purposes of inspection and testing to determine compliance with this permit and department rules.

11. This permit does not indicate a waiver of or approval of any other department permit that may be required for other aspects of the total project.

12. This permit conveys no title to land or water, nor constitutes state recognition or acknowledgement of title, and does not constitute authority for the reclamation of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

13. This permit also constitutes:

- Determination of Best Available Control Technology (BACT)
- Determination of Prevention of Significant Deterioration (PSD)
- Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)

SPECIFIC CONDITIONS:

PERMIT NO.: AC 22330
APPLICANT: Dickerson Asphalt, Inc.
Jacksonville, Florida 32203

Specific Conditions

1. The maximum allowable emission rates from the asphalt batch plant dryer stack are:
 - o particulate matter - 3.4 #/hr not exceeding 0.04 grains per SCDF.
 - o sulfur dioxide - 12.3 #/hr and fuel oil not to exceed 0.24% Sulfur.
2. Operating time periods shall not exceed 8 hours/day; 5 day/week; 40 weeks/yr.
3. Process input rate shall not exceed 150 TPH.
4. Permittee shall submit the date for the start of construction and the projected date of completion, both submitted prior to start of construction to Bureau of Air Quality Management.
5. Following construction completion and prior to submission of an application for a permit to operate the permittee shall submit results of source sampling compliance tests of the asphalt batch plant dryer stack for:
 - a. particulate emission
 - b. sulfur dioxide emission or alternatively sulfur analysis of fuel oil.
 - c. opacity.

The source shall be sampled and updated annually thereafter as required by the operating permit conditions.

DRAFT

Expiration Date:

Issued this _____ day of _____, 19 _____.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

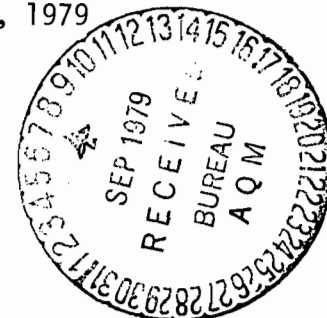


SHOLTES & KOOGLER, ENVIRONMENTAL CONSULTANTS
1213 N.W. 6th Street Gainesville, Florida 32601 (904) 377-5822

SKEC 109-79-01

September 6, 1979

Mr. Stephen Smallwood
Bureau of Air Quality Management
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301



Dear Mr. Smallwood:

With reference to our telephone conversation, enclosed are five (5) copies of the amendment to the Dickerson, Inc., Clay County Asphalt Batching Plant Construction Permit Application. These amendments incorporate the information requested in your letter of August 23, 1979 to Mr. W.B. Lindler of Dickerson, Inc.

If you require any additional information, please contact us.

Very truly yours,

SHOLTES & KOOGLER
ENVIRONMENTAL CONSULTANTS

John B. Koogler, Ph.D., P.E.

JBK:sc
Enclosure

cc: Mr. William B. Lindler (w/enc.)



Rec Sept 2 1979
BAQM

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
APPLICATION TO ~~OPERATE~~ CONSTRUCT
AIR POLLUTION SOURCES

SOURCE TYPE: Air Pollution New¹ Existing¹
APPLICATION TYPE: Construction Operation Modification
COMPANY NAME: Dickerson, Inc. COUNTY: Clay

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peeking Unit No. 2, Gas Fired) Portable Asphalt Batch Plant

SOURCE LOCATION: Street U.S. Hwy 301, 2.65 mi. So. of SR 228 City _____
UTM: East 400700 North 3337120
Latitude 30 ° 09 ' 48 "N Longitude 82 ° 01 ' 51 "W

APPLICANT NAME AND TITLE: William B. Lindler, Vice President
APPLICANT ADDRESS: P. O. Box 40949, Jacksonville, Florida 32203

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Dickerson, Inc.
I certify that the statements made in this application for a Construction permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization
Signed: _____
William B. Lindler, Vice-President
Name and Title (Please Type)
Date: _____ Telephone No. (904) 764-7771

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed: [Signature]
John B. Koogler, P.E.
Name (Please Type)
Scholtes & Koogler Environmental Consultants
Company Name (Please Type)
1213 N.W. 6th St., Gainesville, FL 32601
Mailing Address (Please Type)

(Affix Seal)

Florida Registration No. 12925 Date: _____ Telephone No. 904-377-5822

¹See Section 17-2.02(15) and (22), Florida Administrative Code, (F.A.C.)
DER FORM 17-1.122(16) Page 1 of 10

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

150 ton/hr asphalt batch plant with bag house collector. This facility will
be in full compliance with all applicable State and Federal regulations.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction August 1979 Completion of Construction September 1979

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

Bag House, \$180,000.00

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

None

E. Is this application associated with or part of a Development of Regional Impact (DRI) pursuant to Chapter 380, Florida Statutes, and Chapter 22F-2, Florida Administrative Code? Yes No

F. Normal equipment operating time: hrs/day 8, days/wk 5; wks/yr 40; if power plant, hrs/yr _____; if seasonal, describe: _____

G. If this is a new source or major modification, answer the following questions. (Yes or No)

1. Is this source in a non-attainment area for a particular pollutant?

No

a. If yes, has "offset" been applied?

b. If yes, has "Lowest Achievable Emission Rate" been applied?

c. If yes, list non-attainment pollutants.

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI.

Yes

3. Does the State "Prevention of Significant Deterioration" (PSD) requirements apply to this source? If yes, see Sections VI and VII.

Yes

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source?

Yes

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source?

No

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Aggregate	Particulate	6%	280,000 lbs/hr	Cold Feed bins (1)
Liquid Asphalt	None		20,000 lbs/hr	Asphalt Storage (20)

B. Process Rate, if applicable: (See Section V, Item 1)

1. Total Process Input Rate (lbs/hr): 300,000 lbs/hr
 2. Product Weight (lbs/hr): 300,000 lbs/hr

C. Airborne Contaminants Emitted:

Name of Contaminant	Emission ¹		Allowed Emission ² Rate per Ch. 17-2, F.A.C.	Allowable ³ Emission lbs/hr	Potential Emission ⁴		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/hr	T/yr	
Particulate Matter	3.4	2.7	0.04 grains/SCF NSPS	5.02	735	588	(11)(13)(G) ✓
SO ₂	12.3	9.8	BACT (0.24% S Fuel)	12.3	12.3	9.8	(6)(13)(G) ✓
NO _x	7.1	5.7	N/A	N/A	7.1	5.7	(6)(13)(G) ✓
VOC	0.63	0.6	N/A	N/A	0.63	0.6	(8)(20)(G) ✓

D. Control Devices: (See Section V, Item 4)

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles ⁵ Size Collected (in microns)	Basis for Efficiency (Sec. V, It ⁵)
Astec Bag House 630 - 14 oz Nomex bags; 5.75:1 Air to Cloth ratio	Particulate	99 ⁵³ 85%	- 200 mesh	mfg recommended & test data (see attachment)

¹ See Section V, Item 2.

² Reference applicable emission standards and units (e.g., Section 17-2.05(6) Table II, E. (1), F.A.C. - 0.1 pounds per million BTU heat input)

³ Calculated from operating rate and applicable standard

⁴ Emission, if source operated without control (See Section V, Item 3)

⁵ If Applicable

SECTION V SUPPLEMENTAL INFORMATION

1. PROCESS INPUT RATE & PRODUCT WEIGHT

INPUT: AGGREGATE 280,000 lb/hr
ASPHALTIC CEMENT 20,000
TOTAL INPUT 300,000 lb/hr

OUTPUT: AIR EMISSIONS 3 lb/hr
PRODUCT 299,997
TOTAL OUTPUT 300,000 lb/hr

2. SEE ATTACHMENTS 1 AND 2

3. POTENTIAL EMISSIONS

PRODUCTION RATE - 300,000 lb/hr
150 ton/hr
FUEL USE - 357 gal/hr (max)

PARTICULATE MATTER (AP-42 Sect 8.1)
Uncontrolled emission factor - 4.9 lb/ton
 $4.9 \text{ lb/ton} \times 150 \text{ ton/hr} = 735 \text{ lb/hr}$
 $\times 1600 \text{ hr/yr} \times \frac{1}{2000} = 588 \text{ tons/yr}$

SO₂

$357 \text{ gal/hr} \times 7.2 \text{ lb/gal} \times 0.0024 \text{ lb S/lb fuel}$
 $\times 2 \text{ lb SO}_2/\text{lb S} = 12.3 \text{ lb/hr}$
 $\times 1600/2000 = 9.8 \text{ ton/yr}$ ✓

NO_x (AP-42 Sect 1.3)

Emission factor - 20 lb NO_x / 10³ gal fuel
 $20 \times 357/1000 = 7.1 \text{ lb/hr}$
 $\times 1600/2000 = 5.7 \text{ ton/yr}$

Amended 9/6/79

SHOLTES & KOOGLER

3. POTENTIAL EMISSIONS (CONT)

VOC (AP-42, Sect 4.3)

Fixed roof breathing losses (L_B , lb/day)

$$= 2.21 \times 10^{-4} M \left(\frac{P}{14.7 - P} \right)^{0.68} D^{1.73} H^{0.51} \Delta T^{0.5} F_p K_c$$

	Asphalt	* Fuel 0.1	
M	160	130	80°F
P	0.00009	0.012	
D	25	25	
H	5	5	
DT	20	20	
F _p	1.2	1.2	
K _c	0.65	1.0	
K _n	1.0	1.0	=

turnover factor

$$L_B(\text{Asphalt}) = 0.02 \text{ lb/day}$$

$$L_B(\text{Fuel}) = 0.73 \text{ lb/day}$$

$$\text{Total} = 0.75 \text{ lb/day}$$

$$\times 365 \times \frac{1}{2000} = \underline{0.1 \text{ ton/yr}}$$

Fixed roof working losses (L_w , lb/10³gal)

$$= 2.4 \times 10^{-2} M \times P \times K_n \times K_c$$

$$L_w(\text{Asphalt}) = 0.0002 \text{ lb/10}^3 \text{ gal}$$

$$\times 2500 \text{ gal/hr} = 0.6 \text{ lb/hr}$$

$$L_w(\text{Fuel}) = 0.037 \text{ lb/10}^3 \text{ gal}$$

$$\times 357 \text{ gal/hr} = 0.01 \text{ lb/hr}$$

$$\text{Total} = 0.6 \text{ lb/hr}$$

$$\times 1600 \times \frac{1}{2000} = \underline{0.5 \text{ ton/yr}}$$

Total VOC

$$= 0.75/24 + 0.6 = 0.63 \text{ lb/hr}$$

$$= 0.1 + 0.5 = 0.6 \text{ ton/yr}$$

VOC disch from dryer - ?

571,000 gal
371,000 = 36
turnover
turnover = 15,210 gal/hr?

Amended 9/6/79

SHOLTES & KOOGLER

FUGITIVE PARTICULATE MATTER (AP-42, Sect 11.2.3)
‡ 11.2.1

$$\text{Vehicle } (E_v, \text{ lb/veh-mile}) \\ = 0.81 S \left(\frac{S_p^2}{30^2} \right) \left(\frac{365 - W}{365} \right)$$

S = silt content = 20%

S_p = speed = 10 mi/hr

W = days with 0.01" rain = 115

$$E_v = 1.23 \text{ lb/veh-mile}$$

$$\times 2 \text{ for heavy trucks} = 2.5 \text{ lb/veh-mile}$$

$$\text{Assume } 10 \text{ veh-mile/hr in plant} \\ = 25 \text{ lb/hr}$$

Control by paving (85%)

$$E_v = (1 - 0.85)(25) = \underline{4 \text{ lb/hr}}$$

Storage Piles

$$\text{Amount in storage} \\ = 140 \text{ ton/hr} \times 1600 \text{ hr/yr} \\ \approx 250,000 \text{ ton/yr}$$

$$\text{Amount transferred} \\ = 140 \text{ ton/hr}$$

Wind (F_w, lb/ton in stg)

$$F_w = 0.33 \times \left[0.33 / \left(\frac{PE}{100} \right)^2 \right]$$

$$PE = \text{Ppt/evap index} = 0.99$$

$$= 0.11 \text{ lb/ton}$$

$$\times 250,000 \text{ ton/yr} \times \frac{1}{8760} \text{ yr/hr} \\ = \underline{3 \text{ lb/hr}}$$

Load-in, Load-out, Traffic at pile

$$F_L = 0.67 \times \left[0.33 / \left(\frac{PE}{100} \right)^2 \right]$$

$$= 0.23 \text{ lb/ton}$$

$$\times 140 \text{ ton/hr}$$

$$= \underline{32 \text{ lb/hr}}$$

Amended 9/6/79
SHOLTES * KOOGLER

3. POTENTIAL EMISSIONS (CONT)

FUGITIVE PART MATTER (CONT)

Total Fugit Part

Vehicle - 4 lb/hr
 Wind - 3 lb/hr
 Pile Activities - 32 lb/hr
 Total 39 lb/hr Controlled
 (60 lb/hr uncontrolled)

Annual

$$= [4(1600) + 3(8760) + 32(1600)] / 2000 \text{ lb/ton}$$

$$= 41.9 \text{ tons/year}$$

4. ASTEC PLANT AND BAGHOUSE

BAGHOUSE: 630 - 14 02. NOMEX BAGS
 AIR: CLOTH RATIO = 5.75:1
 (SEE ATTACHMENT 3)

*also used in
 in feed
 in items*

5. EFFICIENCY OF CONTROL SYSTEM

POTENTIAL EMISSIONS = 2250 lb/hr (V-3)
 ACTUAL EMISSIONS = 3.4 lb/hr (V-2)

Efficiency = $\frac{735}{2250 - 3.4} \times 100$

$$= \frac{735}{2246.6} \times 100$$

$$= 99.53\%$$

*APPE - also used in
 = 735#*

Amended 9/6/79
 SHOLTES * KOOGLER

corrected by wes 9/17/79

SECTION V (CONT)

6. PROCESS FLOW DIAGRAM (SEE ATTACHMENT 4) OK

7. LOCATION MAP (SEE ATTACHMENT 5) OK

8. PLOT PLAN (SEE ATTACHMENT 6) OK

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

August 23, 1979

CERTIFIED MAIL

Mr. William B. Lindler
Vice President
Dickerson, Inc.
P. O. Box 40949
Jacksonville, Florida 32203

RE: Drum Mix Asphalt Plant,
Clay County

Dear Mr. Lindler:

The Bureau has received and reviewed for completeness the application submitted by your company to relocate a 150 Ton Drum Mix Asphalt Plant to a site in Clay County.

The application as submitted has been found to be incomplete in several respects.

The attached report "Completeness Evaluation of Dickerson Drum Mix Asphalt Plant Construction Permit Application Clay County, Number AC-10-22330" describes the additional information needed.

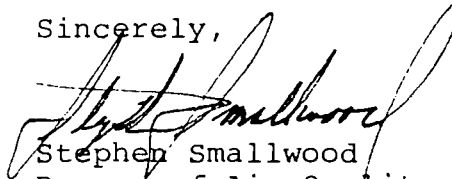
We will be available to meet with you to assist you by phone in completing your application and to work with you in any way possible to expedite the processing of your application.

Mr. William B. Lindler
Page Two
August 23, 1979

For your information, I have attached a copy of 17-2 FAC including the June 1979 nonattainment rule amendments.

Should you have any questions, please contact me at (904) 488-1344.

Sincerely,



Stephen Smallwood
Bureau of Air Quality
Management

SS/es

Attachments

cc: J. P. Subramabi
W. Starnes ✓
D. Dutton
M. DeGrove
J. B. Koogler
R. Cunningham

COMPLETENESS EVALUATION

of

Dickerson Drum Mix Asphalt Plant
Clay County

Application Number AC-10-22330

August 23, 1979

Bureau of Air Quality Management
Florida Department of Environmental Regulation

Determination of Applicable Rules

The proposed plant is to be located within the area or influence of the Jacksonville particulate nonattainment area (see 17-2.13 and 17-2.17(1)). The proposed plant is a major source (see 17-2.02(6)) and 17-2.17(1)(c)2.c.), and is therefore only exempt from the nonattainment rule if reasonable assurance is provided that it does not have significant impact on the nonattainment area (17-2.17(3)(a)(1)a.(ii)).

The proposed plant is to be located at a distance of more than 5 kilometers from the boundary of the particulate nonattainment area, and therefore is not subject to the fugitive particulate matter provisions of the nonattainment rule (17-2.17), however, the plant is subject to the fugitive particulate matter provisions of 17-2.05 Prohibited Acts.

The proposed plant is also a major emitting facility with respect to particulate (17-2.02(70)) and therefore subject to the PSD provisions of 17-2.04, which subjects the particulate emission to control by BACT (17-2.03).

With respect to sulfur dioxide, the plant is neither a major source or a major emitting facility, nor located within a sulfur dioxide nonattainment area or area of influence. Therefore, the sulfur dioxide emissions are not subject to BACT or LAER, but are subject to a permit condition that would provide reasonable assurance that the ambient standards will not be violated.

Sufficient information has not been provided to determine if the plant is a major emitting facility with respect to nitrogen dioxide and VOC emission. If the emission of either is to be greater than 250 tons per year, the affected pollutant is subject to control by BACT (17-2.03, 17-2.02(70)). Neither are subject to the nonattainment rule due to the proposed location; and neither are subject to PSD (17-2.04) due to the type of pollutant.

Ambient Modeling and Monitoring Requirements

No additional modeling or monitoring data is required.

Information Needed

1. Provide emission estimates in ton per year for NO₂ (dryer) and VOC (dryer and on-site fuel or asphalt storage or handling).
2. Recommended BACT for each pollutant (NO₂, VOC) that is to have potential emissions in excess of 250 tons per year.
3. Substantiate emission factor used for particulate emission. Supplement #8 of AP-42 give 4.9 #/ton as the uncontrolled emission factor for drum mix asphalt plants.
4. Identify, quantify, and state control procedures for fugitive particulate emission pursuant to 17-2.05.
5. Specify any limitation on the hours of operation requested. The permitted hours of operation is a factor in the tons/year potential emissions calculations. If no additional specification is provided the operation times shown in Section II, F. Page 2, Form 17-1.122 will be applied both for potential emission calculations and as a permit condition.

COMPLETENESS EVALUATION

of

Dickerson Drum Mix Asphalt Plant

Clay County

Application Number AC-10-22330

August 23, 1979

Bureau of Air Quality Management

Florida Department of Environmental Regulation

Determination of Applicable Rules

The proposed plant is to be located within the area or influence of the Jacksonville particulate nonattainment area (see 17-2.13 and 17-2.17(1)). The proposed plant is a major source (see 17-2.02(6)) and 17-2.17(1)(c)2.c.), and is therefore only exempt from the nonattainment rule if reasonable assurance is provided that it does not have significant impact on the nonattainment area (17-2.17(3)(a)(1)a.(ii)).

The proposed plant is to be located at a distance of more than 5 kilometers from the boundary of the particulate nonattainment area, and therefore is not subject to the fugitive particulate matter provisions of the nonattainment rule (17-2.17), however, the plant is subject to the fugitive particulate matter provisions of 17-2.05 Prohibited Acts.

The proposed plant is also a major emitting facility with respect to particulate (17-2.02(70)) and therefore subject to the PSD provisions of 17-2.04, which subjects the particulate emission to control by BACT (17-2.03).

With respect to sulfur dioxide, the plant is neither a major source or a major emitting facility, nor located within a sulfur dioxide nonattainment area or area of influence. Therefore, the sulfur dioxide emissions are not subject to BACT or LAER, but are subject to a permit condition that would provide reasonable assurance that the ambient standards will not be violated.

Sufficient information has not been provided to determine if the plant is a major emitting facility with respect to nitrogen dioxide and VOC emission. If the emission of either is to be greater than 250 tons per year, the affected pollutant is subject to control by BACT (17-2.03, 17-2.02(70)). Neither are subject to the nonattainment rule due to the proposed location; and neither are subject to PSD (17-2.04) due to the type of pollutant.

Ambient Modeling and Monitoring Requirements

No additional modeling or monitoring data is required.

Information Needed

1. Provide emission estimates in ton per year for NO₂ (dryer) and VOC (dryer and on-site fuel or asphalt storage or handling).
2. Recommended BACT for each pollutant (NO₂, VOC) that is to have potential emissions in excess of 250 tons per year.
3. Substantiate emission factor used for particulate emission. Supplement #8 of AP-42 give 4.9 #/ton as the uncontrolled emission factor for drum mix asphalt plants.
4. Identify, quantify, and state control procedures for fugitive particulate emission pursuant to 17-2.05.
5. Specify any limitation on the hours of operation requested. The permitted hours of operation is a factor in the tons/year potential emissions calculations. If no additional specification is provided the operation times shown in Section II, F. Page 2, Form 17-1.122 will be applied both for potential emission calculations and as a permit condition.

MEETING: Discussion of Dickerson Inc. (asphalt) Applications to Construct in Jacksonville and in Clay County. Also, Brief Discussion of Ashland Chemical Co. Application and General Policy for Interim Permitting Activities.

DATE: August 14, 1979

LOCATION: Bureau of Air Quality Management, Tallahassee

ATTENDEES:

<u>NAME</u>	<u>ORGANIZATION</u>
J. P. Subramani	FDER/BAQM
Steve Smallwood	"
Walt Starnes	"
Mike Harley	"
Victoria Martinez	"
John Symes	"
Bill Blommel	"
Bill Thomas	"
Larry George	"
Mark Hodges	"

PROCEEDINGS: The meeting was called to discuss the Dickerson Inc. (asphalt) and Ashland Chemical Co. Applications, and General Policy Matters.

The following issues, points and questions were discussed, regarding Dickerson Inc. -

1. The cover pages to the applications were complete.
- * 2. Actual street address is lacking in both cases.
3. Modeling shows neither plant to have significant impact upon the nonattainment area.
- * 4. The fugitive TSP issue is pertinent to the Jacksonville application, but was not addressed, ((no legal grounds for requesting it), however, the site is within fugitive TSP area of influence)).
- * 5. VOCs were not addressed, they must be in case of Jacksonville plant but unnecessary for Clay county plant.
- * 6. Both plants are drum rather than rotary mix, so AP 42 factors do not apply. Further substantiation of factors used required, (similar operation being used in Alabama).
7. The potential emissions were not clearly stated.
8. Both plants will be Tier 1.

The following issues were discussed regarding Ashland Chemical Cos' Construction Application:

1. The emission rates are questionable, (vent valve is .8 PSI, but acetone has 4 PSI P_v @ 100° F).
2. Figures on existing VOC emissions were not submitted.
3. More time will be needed by J. Symes to complete evaluation & completeness letter.

The following policy matters were discussed:

1. The applicant may be required to resubmit, (not reapply), on the most current form.
2. In requesting specific further information specific rule subsections, at least, should be cited.
3. UTM coordinates should be reported to the nearest 1/10 km. on applications.
4. USGS quadrangle maps should be requested with all new applications.
- 5/ Actual street address of source is required.
6. In a waiver of the 90-day clock, a written, signed and witnessed letter must be received from the applicant requesting said waiver.
7. Significance level and PSD increment are in no way synonymous.
8. Applicant must do modeling if he is Tier 1, and the application was submitted after 24 July, 1979.
9. An operation schedule of 24 hours/day, 7 days/week and 52 weeks/year will be assumed unless otherwise specified. If specified otherwise, then the specified operating schedule will be an enforceable permit condition.
10. The Tier 1 / Tier 2 determination is based upon the given emission rates.
11. Potential emissions factor will come from AP42 unless further restricted by BACT.
12. Fugitive emission quantifications should be submitted in all future applications.
13. Sources of \leq 100 TPY must be inventoried at BAQM, for later reference.

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301



BOB GRAHAM
GOVERNOR
JACOB D. VARN
SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

August 3, 1979

Mr. William B. Lindler
P. O. Box 40949
Jacksonville, Florida 32203

Dear Mr. Lindler:

This letter is to inform you that the Florida Department of Environmental Regulation, Bureau of Air Quality Management has received and processed the following check(s) submitted by you:

<u>REMITTER</u>	<u>CHECK NUMBER</u>	<u>CHECK AMOUNT</u>	<u>AIR POLLUTION SOURCE CONSTRUCTION APPLICATION FOR:</u>
Alan W. Potter	6389 American Arlington Bank, Jacksonville, Florida	\$20.00	Dickerson Asphalt (Clay County)

If the Department may be of further assistance to you, in the Permit Application Process, please contact Mark Hodges, at 904/488-1344.

Sincerely,

Mark Hodges
Bureau of Air Quality
Management

DER PERMIT APPLICATION TRACKING SYSTEM MASTER RECORD

FILE#000000022330 COE# DER PROCESSOR:STARNES DER OFFICE:TLH
FILE NAME:DICKERSON INCORPORATED DATE FIRST REC: 07/27/79 APPLICATION TYPE:AC
APPL NAME:LINDLER, WILLIAM B. APPL PHONE:(904)764-7774 PROJECT COUNTY:40
ADDR:P.O. BOX 40949 CITY:JACKSONVILLE ST:FLZIP:32203
AGNT NAME:KOOGLER, JOHN P. AGNT PHONE:(904)377-5822
ADDR:SHOLTES AND KOOGLER, 1213 N.W. 6TH ST.CITY:GAINESVILLE ST:FLZIP:32604

ADDITIONAL INFO REQ:08/23/79 / / / / REC: / / / / / /
APPL COMPLETE DATE: / / COMMENTS NEC:Y DATE REQ: / / DATE REC: / /
LETTER OF INTENT NEC:Y DATE WHEN INTENT ISSUED: / / WAIVER DATE: / /

HEARING REQUEST DATES: / / / / / /
HEARING WITHDRAWN/DENIED/ORDER -- DATES: / / / / / /
HEARING ORDER OR FINAL ACTION DUE DATE: / / MANUAL TRACKING DESIRED:M

*** RECORD HAS BEEN SUCCESSFULLY UPDATED *** 08/24/79 14:00:19

FEE PD DATE#1:07/27/79 \$0020 RECEIPT#00033503 REFUND DATE: / / REFUND \$
FEE PD DATE#2: / / \$ RECEIPT# REFUND DATE: / / REFUND \$
APPL:ACTIVE/INACTIVE/DENIED/WITHDRAWN/TRANSFERRED/EXEMPT/ISSUED:AC DATE:07/27/79
REMARKS:SOURCE LOCATION: U.S. H'WY 304, 2.65 MI. S. OF SR 228, UTM=400700E/
3337120N, LAT/LON=30.09'48"N/82.01'51"W, CLAY COUNTY.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

Nº 33503

RECEIPT FOR APPLICATION FEES AND MISCELLANEOUS REVENUE

Received from DICKERSON INC. (PORTABLE ASPHALT
BATCH PLANT,
CLAY CO.) Date 27 JULY 1979

Address U.S. HWY 301, 2.05 MI. S. OF SR 228 Dollars \$ 20⁰⁰

Applicant Name & Address WILLIAM B. LINNER, P.O. 40949, JACKSONVILLE 32203

Source of Revenue _____

Revenue Code 0101 Application Number AC 22330

By M. Madry