Sloan Construction Company Asphalt Plant Lake County

The construction application has been reviewed by the Department. Public notice of the Department's intent to issue was published in the Orlando Sentinel Star on July 11, 1982. The preliminary determination and technical evaluation were available for public inspection at the DER's St. Johns River District and the Bureau of Air Quality Management.

The following comments were received from Mr. Chuck Collins with the DER St. Johns River District:

- 1) State in the permit the emission limit of 0.04 grains per dry standard cubic foot (gr/dscf) imposed by the NSPS.
- 2) State the maximum percent mix of recycled asphalt to be utilized so that the compliance tests will be conducted at a required and known utilization rate.

The Bureau agrees with the comments and will incorporate these comments in the final determination and the following "specific conditions" will be revised and shall read:

Specific Conditions:

- 2. Maximum utilization, total process input, and product rate shall not exceed 200 tons per hour asphalt material, consisting of a mixture of 40% recycled asphalt (maximum) and 60% virgin aggregate.
- 5. Maximum allowable pollutant emissions are:

Pollutant	Emission Limit				
	lbs/hr TPY	_			
Particulate Matter (PM)	0.04 gr/dscf, not to exceed 8.28 10.35	ò			
so ₂	not to exceed 90.20 112.75	;			
Visible Emissions (VE)	<20% opacity				

9. Before this construction permit expires, the source will be tested for PM, SO₂, and VE using DER Methods 1 - 3 and 5, DER Method 6, and DER Method 9, respectively. Minimum sample volume shall be in accordance with NSPS, 40 CFR Part 60, Subpart I or Chapter 17-2.700, F.A.C. The compliance tests shall be at 90-100% of the permitted utilization rate of 200 tons per hour asphalt material (40% recycled asphalt, 60% virgin aggregate). DER's St. Johns River District Office shall be notified 30 days prior to compliance testing. Results of the compliance tests shall be submitted to the DER's St. Johns River District Office within 15 days after completion of the tests.

It is recommended that the construction permit be issued as drafted, with the above revisions incorporated.



STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

CONSTRUCTION PERMIT

NO. AC 35-56301

SLOAN CONSTRUCTION COMPANY P.O. Box 2008 GREENVILLE, SOUTH CAROLINA 29602

DATE OF ISSUANCE

August 12, 1982

DATE OF EXPIRATION

Tem Cole

Victoria J. Tschinkel Secretary

DECEMBER 31, 1982

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2500 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32301



808 GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

APPLICANT:

à.

Sloan Construction Company

P. O. Box 2008

Greenville, South Carolina 29602

PERMIT/CERTIFICATION NO. AC 35-56301

COUNTY: Lake

PROJECT: Portable Asphalt Drum Mix with Fabric Filter

Collector

This permit is issued under the provisions of Chapter.	403	, Florida Statutes, and Chapter 17-2
and 17-4 Florida Administrative Code: T	he above named applicant, hereinafti	er called Permittee; is hereby authorized to
perform the work or operate the facility shown on the	approved drawing(s), plans, docume	nts, and specifications attached hereto and
made a part hereof and specifically described as follows	• Agran	

For the construction/installation of a portable asphalt drum mix plant and fabric filter collector to be located about 6 miles southeast of Clermont, Lake County, Florida. The UTM coordinates of the proposed source are Zone 17-431.659 km East and 3152.693 km North.

Construction shall be in accordance with the permit application and plans, documents, and drawings except as otherwise noted on pages 3 and 4 of the "Specific Conditions".

Attachment is as follows:

- Application to Construct Air Pollution Sources, DER FORM 17-1.122 (16).
- Comments received from Mr. Chuck Collins, DER St. Johns River District, dated July 22, 1982.

PERMIT NO .:

AC 35-56301

APPLICANT:

Sloan Construction Company

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 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 penalities 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.

 ims perime 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)
PAGE2 OF4

This name is also assertances

PERMIT NO .: AC 35-56301

APPLICANT: Sloan Construction Company

SPECIFIC CONDITIONS:

1. Maximum annual hours of operation shall not exceed 2500 hours at a rate of 10 hours per day, 5 days per week, and 50 weeks per year.

- 2. Maximum utilization, total process input, and product rate shall not exceed 200, tons per hour asphalt material, consisting of a mixture of 40% recycled asphalt (maximum) and 60% virgin aggrégate.
- 3. Maximum consumption of No. 5 New Fuel Oil, with a maximum content of 1.7% sulfur by weight, shall not exceed 12.0 barrels per hour (504 gallons per hour).

Note: "New Fuel Oil" means an oil which has been refined from crude oil and has not been used, and which may or may not contain additives.

- 4. Maximum heat input shall not exceed 74.93 x 106 BTU per hour (MMBTU/hr).
- 5. Maximum allowable pollutant emissions are:

<u>Pollutant</u>	Emission Limit	·
	lbs/hr	TPY
Particulate Matter	0.04 gr/dscf, not to exceed 8.28	10.35
so ₂	not to exceed 90.20	112.75
Visible Emissions	<20% opacity	

6. No person shall cause, let, permit, suffer or allow the emissions of unconfined PM from any source whatsoever, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrially related activities such as loading, unloading, storing or handling, without taking reasonable precautions to prevent such emissions. Reasonable precautions may include, but shall not be limited to paving and maintenance of roads, parking areas and yards; application of water or chemicals to control emissions from such activities as grading roads, construction, and land clearing; application of asphalt, water,

PERMIT NO .: AC

AC 35-56301

APPLICANT: Sloan Construction Company

oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar sources; and, enclosure or covering of conveyor systems.

- 7. Construction shall reasonably conform to the plans submitted in the application.
 - 8. The applicant shall report any delays in construction/ installation and completion of this source to DER's St. Johns River District Office.
 - 9. Before this construction permit expires, the source will be tested for PM, SO₂, and VE using DER Methods 1-3 and 5, DER Method 6, and DER Method 9, respectively. Minimum sample volume shall be in accordance with NSPS, 40 CFR Part 60, Subpart I or Chapter 17-2.700, F.A.C. The compliance tests shall be at 90-100% of the permitted utilization rate of 200 tons per hour asphalt material (40% recycled asphalt, 60% virgin aggregate). DER's St. Johns River District Office shall be notified 30 days prior to compliance testing. Results of the compliance tests shall be submitted to the DER's St. Johns River District Office within 15 days after completion of the tests.
- 10. Stack sampling facilities shall be in accordance with Chapter 17-2.700, F.A.C.
- 11. The applicant will demonstrate compliance with the conditions of this construction permit and submit a complete application for an operating permit to the DER's St. Johns River District Office prior to 90 days before the expiration date of this permit. The applicant may continue to operate in compliance with the terms of this construction permit until its expiration date or until issuance of an operating permit.

Expiration Date: December 31, 1982	Issued this 17 day of Qua , 19 62.
Pages Attached.	STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION
	Tem Colonsignature

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

MEMORANDUM

TO: V. L. Ashmore, Jr., Sloan Construction Company John W. Seabury, Seabury-Bottorf Associates, Inc. Chuck Collins, DER St. Johns River District

FROM: Bill Thomas, Bureau of Air Quality Management

DATE: July 2, 1982

SUBJECT: Preliminary Determination - Sloan Construction

Company, Inc., (AC 35-56301)

Attached is one copy of the application, Technical Evaluation and Preliminary Determination, and proposed permit to Sloan Construction Company for construction/installation of a portable asphalt drum mix plant southeast of Clermont, Lake County, Florida. The public notice will appear in the Orlando Sentinel in the near future.

Please submit to me, in writing, any comments which you wish to have considered concerning this action.

BT/ras

Attachment

NOTICE OF PROPOSED AGENCY ACTION

The Department of Environmental Regulation gives notice of its intent to issue a permit to Sloan Construction Company, Inc., for construction/installation of a portable asphalt drum mix plant southeast of Clermont, Lake County, Florida. A determination of Best Available Control Technology (BACT) was not required.

A person who is substantially affected by the Department's proposed permitting decision may request a hearing in accordance with Section 120.57, Florida Statutes, and Chapters 17-1 and 28-5, Florida Administrative Code. The request for hearing must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitute a waiver of any right such person may have to request a hearing under Section 120.57, Florida Statutes.

The application, technical evaluation and departmental intent are available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the following locations:

DER, Bureau of Air Quality Mgmt. 2600 Blair Stone Road Tallahassee, FL 32301 DER St. Johns River Dist. 3319 Maguire Blvd. Suite 232 Orlando, FL 32803

Comments on this action shall be submitted in writing to Bill Thomas of the Tallahassee office within thirty (30) days of this notice.

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.

Technical Evaluation and Preliminary Determination

Sloan Construction Company, Inc.
Clermont, Florida

Application Number:
AC 35-56301

Florida Department of Environmental Regulation

Bureau of Air Quality Management

Central Air Permitting

I. PROJECT DESCRIPTION

A. Applicant

Sloan Construction Company, Inc. P. O. Box 2008 Greenville, South Carolina 29602

B. Project and Description

The applicant intends to construct/install a new 200 ton per hour portable asphalt drum mix plant.

The plant location will be approximately 6 miles southeast of Clermont, Lake County, Florida. The UTM coordinates are Zone 17-431.659 km East and 3152.693 km North.

C. Process and Controls

Asphalt concrete is produced at this drum mix plant. Within the drum, recycled paving material is mixed with virgin aggregate and the liquid asphalt. No. 5 New Fuel Oil, with a maximum content of 1.7% sulfur by weight, will be fired to dry the aggregate and to provide heat to melt the recycled asphalt. The maximum utilization rate/total process input rate and product weight will be limited to 200 tons per hour of asphalt material.

Note: "New Fuel Oil" means an oil which has been refined from crude oil and has not been used, and which may or may not contain additives.

Control equipment will be a fabric filter collector and a pneumatic dust handling system for the removal/collection of particulate matter (PM).

II. RULE APPLICABILITY

For construction or modification of air pollutant emitting facilities in those parts of the state in which the state ambient air quality standards are being met, a review for prevention of significant deterioration (PSD) applicability is required according to Chapter 17-2.500, Florida Administrative Code (FAC). This type of operation is not on the list of 28, Major Facility Categories, according to Chapter 17-2, Table 500-1, FAC, and therefore, would require 250 tons per year (TPY) or greater emissions of a pollutant in order to be classified as a major emitting facility.

The proposed maximum pollutant emissions for particulate matter (PM) and SO₂ are 8.28 lbs/hr, 10.35 TPY and 90.2 lbs/hr, 112.75 TPY, respectively. The source would be classified as a new major source according to Chapter 17-2.100 (96), FAC, but not a major emitting facility according to Chapter 17-2.500 (2)(d) 2.a., FAC. Therefore, the source would be exempted from further PSD review and will be permitted in accordance with Chapters 17-2.520, 17-2.610, and 17-2.660, FAC. Chapter 17-2.660 (2)(a), FAC contains the New Source Performance Standard (NSPS) for Asphalt Concrete Plants, as adopted by reference from 40 CFR Part 60, Subpart I.

The maximum emission limit for PM is 0.04 grains per dry standard cubic foot (gr/dscf). Visible emissions shall be restricted to less than 20% opacity (Ringelmann Chart No. 1). Since there are no SO₂ emissions limiting standard for this type of source contained in the NSPS, 40 CFR Part 60, or Chapter 17-2, FAC, the SO₂ maximum emission limits shall be as requested by the applicant and based on AP-42 Table 1.3-1, Emission Factors for Fuel Oil Combustion.

III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

A. Emission Limitations

The regulated pollutant emissions from this source are PM, SO_2 , and visible emissions (VE) in accordance with Chapter 17-2.660(2)(a), FAC, and in the case of SO_2 , as requested by the applicant and acceptable by the Department.

Pollutant	Emission Limit
	lbs/hr TPY
PM	8.28 10.35
SO ₂	90.20 112.75
VE	<20% opacity

The permitted emissions are in compliance with all applicable requirements of Chapter 17-2, FAC, including the adopted NSPS requirements of 40 CFR Part 60, Subpart I.

B. Air Quality Impacts

From a technical and modelling review of the application, the Department has determined that the construction and operation of this source will not have any impact on Florida's ambient air quality standards.

IV. CONCLUSION

The permitted emissions from this source, with its maximum utilization and product rate of 200 tons per hour of asphalt material, will not cause or contribute to any violation of Florida's ambient air quality standards.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all applicable requirements of Chapter 17-2, FAC.

Attachment 1



SAINT JOHNS RIVER DISTRICT



DER

AC 35-56301

JUN 7 198

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

. APPLICATION TO OPERATE/CONST AIR POLLUTION SOURCES

SOURCE TYPE:Aspha:	lt Plant	[X] New ¹ [] Existing	1 AUSTRALIA
	onstruction [] Operation []	•	Laka
COMPANY NAME:STORE	n Construction Co., Inc	•	_ COUNTY:
dentify the specific emission p No. 2, Gas Fired)Portal	ooint source(s) addressed in this a ble Drum Mix Plant with	pplication (i.e. Lime Kiln No Pabric Filter Coll	o. 4 with Venturi Scrubber; Peeking Unit ector & #5 Fuel Oil Burners
SOURCE LOCATION: Stree	About 6 miles S.E. of	Clermont, Florida	City Clermont
UTM	1: East17431658.5	North	3152693
Latit	tude <u>28</u> o <u>30</u> , <u>59</u> "	N Longitude	82 0 41 , 54 _{"W}
APPLICANT NAME AND TITL	E: V. L. Ashmore, Jr	r., Executive Vice	President
APPLICANT ADDRESS:	Box 2008, Greenville,	South Carolina 296	i02.
AIT EIOAITT ADDITESS.			
,	SECTION I: STATEMENTS B	BY APPLICANT AND ENGI	NEER TO ALL THE STATE OF THE ST
A. APPLICANT			
l am the undersigned own	ner or authorized representative * o	f Sloan Construct	ion Co., Inc.
Logstifu that the statemer	nts made in this application for a _	construction	
permitted establishment. *Attach letter of authorization		Signed: 1. L.	Sartment upon sale or legal transfer of the
			, Jr., Executive Vice President
			and Title (Please Type)
		Date:	_ Telephone No(803) 271-9090
B. PROFESSIONAL ENGIN	EER REGISTERED IN FLORIDA	A (where required by Chapte	er 471, F.S.)
be in conformity with mo permit application. There erly maintained and open rules and regulations of t	odern engineering principles appli e is reasonable assurance, in my pr ated, will discharge an effluent tha the department. It is also agreed th	cable to the treatment and d rofessional judgment, that th it complies with all applicabl at the undersigned will furni	n designed/examined by me and found to disposal of pollutants characterized in the ne pollution control facilities, when propole statutes of the State of Florida and the ish, if authorized by the owner, the application facilities and, if applicable, pollution
· ·		Signed:	w, slowing
	$\frac{1}{\epsilon} \frac{\partial u_{ij}}{\partial t} $	John W. Sea	
(Affix Seal)	Significant of the second	Geabyry-Bottorf	ame (Please Type) Associates, In
	(Chouselou)	3702 Silver Sta	ny Name (Please Type) r Rd., Orlando, Fl 32808
Florida Registration No	671P	Mailing May 20, 1982 Date:	Address (Please Type) (305) 298-0846 Telephone No.
			- · · · - p · · · · · · · · · · · · · ·

SECTION II: GENERAL PROJECT INFORMATION

This is an application to construct a portable drum mix	aspirate plane for recyclin
paving material with virgin aggregate for Florida DOT p	
fabric filter collector and pnoumatic dust handling sys	<u></u>
emissions within allowable limits. See Supplement Page	2.
Schedule of project covered in this application (Construction Permit Application (
Start of Construction June 1, 1982 Completion of Cor	nstruction June 30, 1982
Costs of pollution control system(s): (Note: Show breakdown of estimated cosproject serving pollution control purposes. Information on actual costs shall be permit.)	
Astec Baghouse Model No. PSFS-41 \$140,0	000
Scavenger Dust Conveying System 10,0	000
Extension of drum for emission control 25,0	000
	,
s this application associated with or part of a Development of Regional Impact (D	ORI) pursuant to Chapter 380, Florida Sta
and Chapter 22F-2, Florida Administrative Code? YesX No Normal equipment operating time: hrs/day10; days/wk5; wks. f seasonal, describe: This is a temporary installation for the seasonal of t	ORI) pursuant to Chapter 380, Florida Sta /yr50 ; if power plant, hrs/yr the purpose of reconstruction
and Chapter 22F-2, Florida Administrative Code? Yes X No Normal equipment operating time: hrs/day 10; days/wk 5; wks f seasonal, describe: This is a temporary installation for to of various roads under contract with Florida DOT in Lab	ORI) pursuant to Chapter 380, Florida Sta /yr50; if power plant, hrs/yr the purpose of reconstruction ke County operation is non—
and Chapter 22F-2, Florida Administrative Code? Yes X No Normal equipment operating time: hrs/day 10; days/wk 5; wks f seasonal, describe: This is a temporary installation for to of various roads under contract with Florida DOT in Lab	ORI) pursuant to Chapter 380, Florida Sta /yr50; if power plant, hrs/yr the purpose of reconstruction ke County operation is non—
and Chapter 22F-2, Florida Administrative Code?YesXNo Normal equipment operating time: hrs/day10; days/wk5; wks if seasonal, describe:This is a temporary installation for to of various roads under contract with Florida DOT in Lab seasonal but will vary according to project requirement	ORI) pursuant to Chapter 380, Florida Sta /yr 50; if power plant, hrs/yr the purpose of reconstruction we County operation is non- ts and weather.
And Chapter 22F-2, Florida Administrative Code?YesXNo Normal equipment operating time: hrs/day10; days/wk5; wks. If seasonal, describe:This is a temporary installation for the contract with Florida DOT in Lagrange and seasonal but will vary according to project requirement of this is a new source or major modification, answer the following questions. (Yes	ORI) pursuant to Chapter 380, Florida Sta /yr 50; if power plant, hrs/yr the purpose of reconstruction we County operation is non- ts and weather.
Normal equipment operating time: hrs/day 10; days/wk 5; wks if seasonal, describe: This is a temporary installation for to of various roads under contract with Florida DOT in Lay seasonal but will vary according to project requirement of this is a new source or major modification, answer the following questions. (Yes 1. Is this source in a non-attainment area for a particular pollutant?	ORI) pursuant to Chapter 380, Florida State /yr50 ; if power plant, hrs/yr the purpose of reconstruction the County operation is non- ts and weather.
And Chapter 22F-2, Florida Administrative Code? Yes X No Normal equipment operating time: hrs/day 10; days/wk 5; wks. if seasonal, describe: This is a temporary installation for to of various roads under contract with Florida DOT in La) seasonal but will vary according to project requirement If this is a new source or major modification, answer the following questions. (Yes 1. Is this source in a non-attainment area for a particular pollutant? a. If yes, has "offset" been applied?	ORI) pursuant to Chapter 380, Florida State /yr50 ; if power plant, hrs/yr the purpose of reconstruction the County operation is non- ts and weather.
of various roads under contract with Florida DOT in La) seasonal but will vary according to project requirement of this is a new source or major modification, answer the following questions. (Yes 1. Is this source in a non-attainment area for a particular pollutant? a. If yes, has "offset" been applied? b. If yes, has "Lowest Achievable Emission Rate" been applied?	ORI) pursuant to Chapter 380, Florida State /yr50 ; if power plant, hrs/yr the purpose of reconstruction the County operation is non- ts and weather.
Normal equipment operating time: hrs/day 10; days/wk 5; wks. if seasonal, describe: This is a temporary installation for to of various roads under contract with Florida DOT in Lays seasonal but will vary according to project requirement of this is a new source or major modification, answer the following questions. (Yes. 1. Is this source in a non-attainment area for a particular pollutant? a. If yes, has "offset" been applied?	ORI) pursuant to Chapter 380, Florida State /yr50 ; if power plant, hrs/yr the purpose of reconstruction the County operation is non- ts and weather.
Normal equipment operating time: hrs/day 10; days/wk 5; wks f seasonal, describe: This is a temporary installation for to f various roads under contract with Florida DOT in Lays easonal but will vary according to project requirement of this is a new source or major modification, answer the following questions. (Yes l. Is this source in a non-attainment area for a particular pollutant? a. If yes, has "offset" been applied? b. If yes, has "Lowest Achievable Emission Rate" been applied? c. If yes, list non-attainment pollutants.	ORI) pursuant to Chapter 380, Florida State /yr50; if power plant, hrs/yr the purpose of reconstruction ke County operation is non- ts and weather. s or No) No
Normal equipment operating time: hrs/day 10; days/wk 5; wks. if seasonal, describe: This is a temporary installation for to of various roads under contract with Florida DOT in Layseasonal but will vary according to project requirement of this is a new source or major modification, answer the following questions. (Yes. Is this source in a non-attainment area for a particular pollutant? 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, so Section VI.	ORI) pursuant to Chapter 380, Florida State /yr50; if power plant, hrs/yr the purpose of reconstruction ke County operation is non— ts and weather. s or No) No No No
Normal equipment operating time: hrs/day 10; days/wk 5; wks. if seasonal, describe: This is a temporary installation for to of various roads under contract with Florida DOT in Layseasonal but will vary according to project requirement of this is a new source or major modification, answer the following questions. (Yes. 1. Is this source in a non-attainment area for a particular pollutant? 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, section VI. 3. Does the State "Prevention of Significant Deterioriation" (PSD) requirements.	ORI) pursuant to Chapter 380, Florida State /yr50; if power plant, hrs/yr the purpose of reconstruction kee County operation is non— ts and weather. s or No) No No No Yes*

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

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

Description	Contami	nants	Utilization	Relate to Flow Diagram	
Description	Туре	% Wt	Rate - lbs/hr		
New Aggregate	Particulate	.245	223,200	①	
Recycled Aggregate	None	<u> </u>	160,000	(2)	
Asphalt	None		16,800	3	
			400,000	(5)	

B.	Process Rate, if applicable: (See Section V, Item 1)	
	1. Total Process Input Rate (lbs/hr): 400,000	
	2. Product Weight (lbs/hr): 400,000	·

Airborne Contaminants Emitted:

None of	Emi	ssion ¹		Allowed Emission ²	Allowable ³	Potential Emission ⁴	Relate
Name of Contaminant	Maximum lbs/hr	Actual T/yr	1	Rate per Ch. 17-2, F.A.C.	Emission lbs/hr	lbs/hr T/yr	to Flow Diagram
Particulate	8.28	10.35	.04 19 37	Gr./DSCF g/m ³ Avg.Aánmal g/m ³ 24 Hr.Max.	8.28	980 • 1225	4
SO ₂	90.2	112.75	29	g/m ³ Avg.Annual	90.2	90.2 •• 112.75	(4)
			91	g/m ³ 24 Hr.Nax.			

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 Model PSFS-41	Particulate	99%	Ahove 0.8 microns	Air to Cloth
	,			Ratio 6:1
				at 41,000 ACFM
				14 Oz. Nomex Ba

¹See 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)

³Calculated from operating rate and applicable standard

Prom AP-42, Supplement 8, Table 8.1-2

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

^{**}From AP-42, Table 1-5, Rev. 72

E. Fuels

Type (De Seeifie)	Consur	Maximum Heat Input	
Type (Be Specific)	avg/hr	max./hr	Maximum Heat Input (MMBTU/hr)
#5 Fuel Oil	8.05	12.0	75.6
			· · · · · · · · · · · · · · · · · · ·

							
							<u> </u>
*Units Natural Gas,	MMCF/hr; Fuel	Oils, barrels/hr; (Coal, Ibs/hr		· · · · · · · · · · · · · · · · · · ·		
Fuel Analysis:			•				
Percent Sulfur:	1.7		<u></u>	Percent Ash: _	.0	5	•
Density:				Typical Percent	Nitrogen:	1	
Heat Capacity:	18,700		BTU/lb	148,5	00	• •	BTU/g
Other Fuel Contam	inants (which ma	ay cause air pollut	ion):No	t applicabl	<u>e</u>		
If applicable,	indicate the per	cent of fuel used i	or space heati	ng. Annual Av	erage N/A	Maximum	
G. Indicate liqui	d or solid wastes	generated and me	thod of dispo	sal.	ess - no liq	udd saaks	٠.
			and recur	ned to proc	ess - 110 11q	did waste.	
,				 <u></u>		,	
	00 74	Flow Characteris	•				
Stack Height:				Stack Diameter		<u>4</u>	1
Gas Flow Ra	te:	15				90	
Water Vapor (Content:		%	Velocity:			FF
							٠.
							•
		SECTION	IV: INCINER	RATOR INFORM	IATION		
Type of Waste	Type O (Plastics)	Type ((Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq & Gas By-prod.)	Type VI (Solid By prod.)
Lbs/hr					Type IV (Pathological)	(Liq & Gas	(Solid
: '					Type IV (Pathological)	(Liq & Gas	(Solid
Lbs/hr	(Plastics)		(Refuse)		Type IV (Pathological)	(Liq & Gas	(Solid
Lbs/hr Incinerated	(Plastics)	(Rubbish)	(Refuse)	(Garbage)	(Pathological)	(Liq & Gas By-prod.)	(Solid
Lbs/hr Incinerated Description of Wast	(Plastics) e	(Rubbish)	(Refuse)	(Garbage) Design Capacity	(Pathological)	(Liq & Gas By-prod.)	(Solid

Date Constructed

,	Volume (ft)3	Heat Release (BTU/hr)	Fuel		Temperature
			Туре	BTU/hr	(OF)
Primary Chamber					
Secondary Chamber					
Stack Height:		ft. Stack Diameter	·	Stack Temp	·
Gas Flow Rate:		ACFM	4	_ DSCFM* Velocity _	FP\$
*If 50 or more tons per coss air.	day design capa	city, submit the emiss	sions rate in grains p	per standard cubic foot	dry gas corrected to 50% ex-
Type of pollution control	device: [] C	yclone [] Wet Scru	ıbber [] Afterbu	ırner [] Other (speci	fy)
Brief description of operat	ting characterist	cics of control devices:			· · · · · · · · · · · · · · · · · · ·
·					
· · · · · · · · · · · · · · · · · · ·					· · · · · · · · · · · · · · · · · · ·
			<u> </u>		
Ultimate disposal of any e	ffluent other th	an that emitted from	the stack (scrubber	water, ash, etc.):	·
					

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

- 1. Total process input rate and product weight show derivation.
- 2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.,) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
- 3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
- 4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, etc.).
- 5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3, and 5 should be consistent: actual emissions = potential (1-efficiency).
- 6. An 8½" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained. See Drawing No. 372-SK1.
- 7. An 8½" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map). See Drawing No. 372-SK2.
- 8. An 8½" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram. See Drawing No. 372-SK3.

Best Available Copy

- 3. An application fee of \$20, unless exempted by Section 17-4.05(3), F.A.C. The check should be made payable to the Department of Environmental Regulation.
- With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

Contaminant			Rate or Concentration
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		. , ,	
			
	·		•
			
Has EPA declared the best available control to	echnology for thi	s class of sources (If)	·
Contaminant			Rate or Concentration
		. To the second of the	
	**********	<u> </u>	

	₹		
What emission levels do you propose as best a	wailable control	technology?	
Contaminant	•		Rate or Concentration
The second secon	They be seen	, a company of the contract of the second	
	Carlo Car	Property Agents	
			
			
Describe the existing control and treatment to	echnology (if any	·).	
1. Control Device/System:			
2. Operating Principles:			
3. Efficiency: *	4.	Capital Costs:	• • • •
5. Useful Life:	.6.	Operating Costs:	
7. Energy:	8.	Maintenance Cost:	
9. Emissions:			
Contaminant			Rate or Concentration
- Contaminant			nate of Concentration :/
·			

^{*}Explain method of determining D 3 above.

(6) Telephone No.:	
(7) Emissions*:	
Contaminant	Rate or Concentration
<u>· </u>	
(8) Process Rate*:	
10. Reason for selection and description of systems:	

ATTACHMENTS:

(5) Environmental Manager:

- 1. Supplement Pages 2, 2a, 2b, 2c, 2d.
- 2. Supplement to Section V, 2 pages.
- 3. Drawings No. 372-SK1, SK2, and SK3 dated 5/20/82.
- 4. Copy of Letter dated 9/13/79 from Jacob D. Varn (DER) to John W. Seabury.
- 5. Check in amount of \$20.00 payable to the Florida Dept. of Environmental Regulation.

^{*}Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SLOAN CONSTRUCTION CO., INC. Lake County

This plant is to be similar to another plant by the same manufacturer (Astec) and operated by the same Owner in Broward County which proved very successful in mixing reclaimed pavement material with new material to provide a lower cost product for resurfacing of highways.

By using a somewhat longer drum than has been customary in the past and by an ingenious method of inserting the "old asphalt" at a safe distance from the flame end of dryer, the recycle material is melted and mingled with the new asphalt and aggregate without danger of ignition.

Past experience by the manufacturer (Astec Industries, Inc., Chattanooga) indicates that plants operating on a mixture of recycled and new material are as clean as or cleaner than plants utilizing only virgin material.

This was indeed the case in the instance of the Broward installation: Copy* of Pages 1 and 2 of report of a particulate test, 8/25/81, summarizing results is included.

An Astec information sheet on drum conversions is included (see Supplement Page 2a).

*Description and summary of test included - See Supplement Pages 2b & 2c.

Supplement Page 2 (To DER Form 17-1.122(16)

Best Available Copy

REGULAR MIX AND RECYCLE MIX FORMULAS WITH YOUR PRESENT DRUM MIXER

You Can Have A Recycling Plant

Turn your drum mixer into a recycling plant with an ASTEC Dual Entry Recycling Kit. The experimental state of blending reclaimed asphalt is fast disappearing. Recycling has become a reality.

With an ASTEC Dual Feed System your drum mixer will have an entry for new and for old materials. The reclaimed material enters the drum through a center entry system at a point where the showering of virgin material shields the old materials from the burner flame and a blending of the two materials is most efficient.

The ASTEC Dual Entry System can be easily added to your drum. Use it for a recycling job or close it off for your regular asphalt mixes.

This internal view of a drum mixer pictures an installation of the exclusive ASTEC Distribution Chutes. These half-round chutes provide a smooth uninterrupted flow of recycle material into the mixing process. The design eliminates the possibility of a roll back of material

plagued some of the earlier attempts of a center feed. There are no moving parts; no gates that flop open and ture to prevent smoking of the recycle material. However, as ratios become higher, there is less virgin material to cool the gases and therefore high gas temperatures occur at the asphalt injection point.

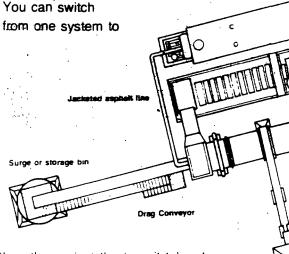
A 50-50 blend of virgin and recycle material is usually possible, but realistically, the percentage of recycle material you can process may be considerably higher or lower than 50%. Major determining factors are: the grade and type of liquid cement that was used to make the recycled road material, the moisture of the virgin aggregate, and the production rate.

The Astec Recycling Kit

A recycling kit includes the Astec patented internal distribution chutes; a breeching that is custom-made to fit around the outside

of your drum; a

Cold Feed Sine



the other in just the time it takes to empty, the mix you're running out of the drum and the silo.

Exclusive Astec Design

The ASTEC center entry is, as you would expect, a step ahead of competition. Exclusive half-round distribution chutes provide a smooth easy flow of reclaimed material into the mixing process. The design allows no possibility of a roll back of material that causes build-up in the outer housing — a problem that has

close. Flights inside the drum remain standard — no gobbledegook about special cascading action. If your drum is efficient today it will maintain the same efficiency with the ASTEC Recycling Kit.

Breeching and entry for recycle material

Bert conveyor

Principle of Operation

Virgin material cools high temperature gases in the intake end of the drum to a sufficiently low temperaweighbridge with loadcell to be mounted on the belt conveyor moving recycle material; and controls that will automatically blend the required percentages of new and old materials.

You may have—or ASTEC can supply—other equipment needed for recycling reclaimed material. A cold feed hopper with a belt feeder and an inclined conveyor from the hopper to the drum is usually all that is required.

The ASTEC Recycling Kit can be installed on your present drum mixer. It's easy, inexpensive, efficient and proven.

Supplement Page 2a

ASTEC INDUSTRIES, INC.

I. INTRODUCTION

On August 25, 1981, the following stationary source was tested for particulate emissions using the EPA Method 5 as directed by the RULES OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION, Chapter 17-2, Section 17-2.23 "Stationary Point Source Emissions Test Procedures", Paragraph 17-2.13(3)(d) as filed 5/27/81, effective date June 16, 1981.

Baghouse Stack Permit AC 06-41234 Sloan Construction Company, Inc. Deerfield Beach, Florida

Personnel involved were:

Seabury-Bottorf Associates, Inc.

John W. Seabury, P. E. Nathan D. Seabury
Kent D. Bottorf

Regulatory Agencies:

Mark W. Eshleman, Pollution Control Engineer, Broward County Environmental Quality Control Board

Sloan Construction Company, Inc.:

Frank Miller, Jr., Project Manager Plant Operating Personnel

II. OPERATION

The baghouse controls final emissions from the drum mix dryer after the dust laden air stream has been drawn through a "knock-out box" separator. Dust is filtered from the air stream through Nomex bags with an air to cloth ratio of 5.5:1. The bags are cleaned by reverse air cleaning. Heat for the drying process is generated by burning low sulphur oil. No pollutants exceeding Department of Environmental Regulation requirements are produced by combustion of the fuel. Other dust control apparatus discharges within the process.

The first test run began at 9:35 A.M. and was delayed from 9:37 A.M. to 9:40 A.M. and from 10:16 A.M. to 10:24 A.M. due to plant shutdown. The first run was completed at 10:34 A.M. The second test run began at 1:35 P.M. and was completed at 2:23 P.M. The third test run began at 4:05 P.M. and was terminated at 4:52 P.M. because the plant closed for the day.

301-4

1.

BEST AVAILABLE COPY

III. SUMMARY OF RESULTS

Production Rate 177.9 Tons/Hour
Fuel Consumption 1.69 Gallons/Ton

	Run #1	Run #2	Run #3
Stack Velocity, fps (V _S)	52.68	54.08	53.31
Volumetric Flow Rate, SCFM (Q _{std})	21,675	22,060	23,369
Moisture Content, % (B _W)	25.34	24.86	19.91
Pollutant Mass Rate, Lbs./Hr. (PMR)	.9804	.9021	.9244
Allowable Emissions Rate, Lbs./Hr. (AER) @ .04 Gr./SCFM	7.43	7.56	8.01
Isokinetic Rate, % (I)	94.13	99.75	96.82

IV. CONCLUSIONS

The plant operated normally at permitted conditions with an average allowable emission rate of 7.67 Lbs./Hr. and an average actual emission rate of .94 Lbs./Hr. This source is well within compliance for particulate.

The test, analysis of samples, and all other procedures were performed in a professional manner and in accordance with the official procedures as outlined in the RULES OF THE DEPARTMENT OF ENVIRONMENTAL REGULATION, Chapter 17-2, Section 17-2.23 "Stationary Point Source Emissions Test Procedures", Paragraph 17-2.13(3)(d) as filed 5/27/81, effective date June 16, 1981.

K. £ D. B.tta/ Environmental Aparyst

Engineer

(SEAL)

2.

SLOAN CONSTRUCTION CO., INC.

Lake County

Supplement to Page 2, DER Form 17-1.122(16) Reference Paragraph G.3.

From EPA-450/2-78-019
May 1978
(OAQPS No. 1.2-096)
"Ambient Monitoring Guidelines for Prevention of Significant Deterioration"

We find that this source is not one of the 28 categories with potential to emit more than 100 tons per year. It is, however, "any other source" with a potential to emit 250 tons per year.

Referring to Section V, Supplement 2, calculations indicate a potential particulate emission of 980 Lb./Hr. or 1225 Tons/Year thus putting this in the "any other source" category emitting over 250 Tons/Year.

The other contaminant emitted is SO₂. Based on 1981 fuel consumption for similar plant of 1.69 gallons/ton of product, oil consumption will be:

1.69 x 200 Tons/Hr. = 338 Gallons/Hr.

Since No. 5 oil @ 1.7% Sulphur will emit SO₂ at a rate of 267 Lbs./10³Gal. Based on Table 1-5 of AP-42 (Rev. 72)

The total SO₂ emitted becomes 267/10³ x 338 = 90.2 Lb./Hr. or 90.2 x 10 = 902 Lb./Day or 902 x 5 = 4510 Lb./Week or 4510 x 50 + 2000 = 112.75 Tons/Year

Since this source is not one of the 28 categories limited to 100 tons per year, but is one of the "other" not exceeding 250 tons per year; we find that the $\rm SO_2$ emitted does not contribute to significant deterioration as spelled out in the referenced publication.

The Florida Department of Environmental Regulation, through its Tallahassee office, has indicated its willingness to minimize modeling and monitoring requirements for the relocatable asphalt plants - see letter dated September 18, 1979, Jacob D. Varn to John W. Seabury, P. E., attached. The Florida Department of Environmental Regulation also indicated that, until the "Alabama Power Co. vs. Costle" case is resolved, they would assume the responsibility for any modeling that may be required.

Section V - Supplemental Requirements - DER Form 17-1.122 (16)

Supplement 1

Process input rate and product rate are the same since all raw material entering dryer emerge in product undiminished except for moisture which is excluded by definition - see rules of the Florida Department of Environmental Regulations Chapter 17-2.02.

Supplement 2

Nominal air flow is 41,000 ACFM although there may be a slight variation due to moisture content of input and modulation of temperature controls.

The fabric filter dust collector has a minimum cloth area of 6,879 square feet and when operating at 41,000 ACFM, the air to cloth ratio is 5.96 to 1.

At this ratio the emissions meet current standards of 0.04 grains per DSCF. This source will be tested for particulate emissions following methods listed in the current Florida Testing Manual using equipment which conforms to standards listed in EPA Method 5.

Calculations for maximum lb. per hour corrected to standard conditions.

ACFM = 41,000; % of moisture = 15; temperature = 290° F. Then (1-.15) 41,000 $\frac{60+460}{290+460}$ = 24,162 SCFM

 $60 \times 24,162 \times .04 \div 7,000 = 8.28 lb./hour allowable.$

Calculations for potential emissions from AP - 42, Supplement 8, Table 8.1-2, uncontrolled emissions of 4.9 lbs./ton.

4.9 x 200 = 980 lb./hour 980 x 10 = 9,800 lb./day 9,800 x 5 = 49,000 lb./week 245,000 ÷ 2,000 = 1,225 tons/year

Supplement 3

Potential discharge reference was made to AP - 42, Table 8.2-1, Supplement 8 for particulate and the potential discharge reference for fuel contaminate was made to AP - 42, (revised 1972).

--:::

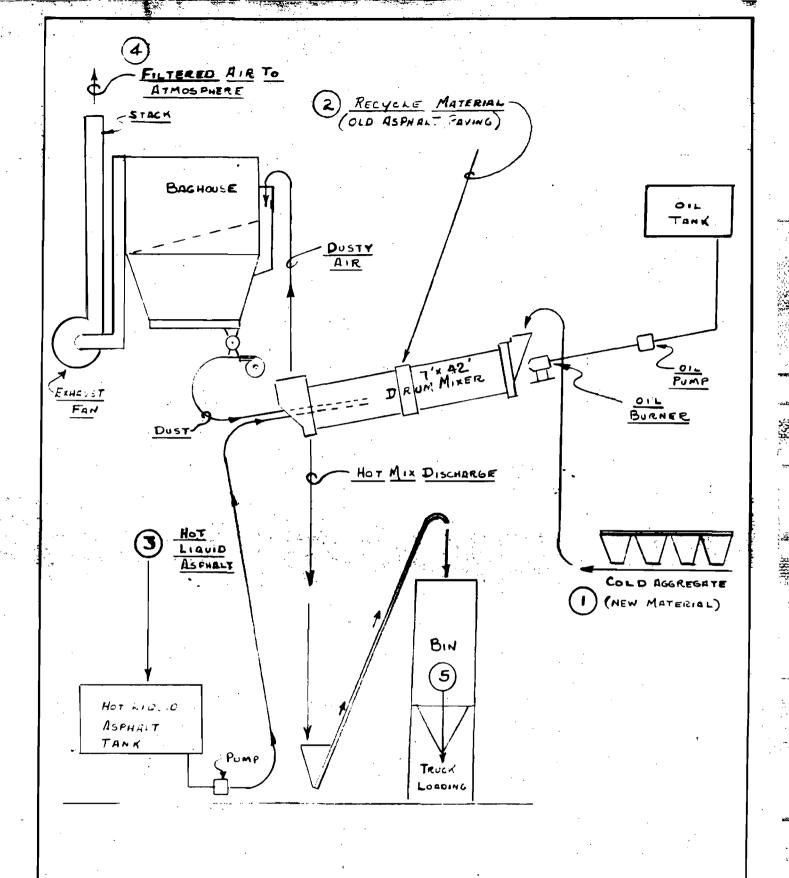
Supplements IV and V

 Control device and dust collector, Astec Model PSFS - 41, fabric filter baghouse. Cloth area 6,879 square feet. Air to cloth ratio is 5.96 to 1 @ 41,000 CFM. Cloth bags are arranged in modules of 65 bags each with a total of 11 modules. Modules are cleaned one at a time by reverse air flow from a 15 HP blower. Dust falls from the bags on dirty air side and is removed by a 3 HP screw conveyor and returned to process.

2. Actual Emissions = Potential (1 - Efficiency)

8.28 = 980 (1 - Efficiency)

Efficiency = .9915

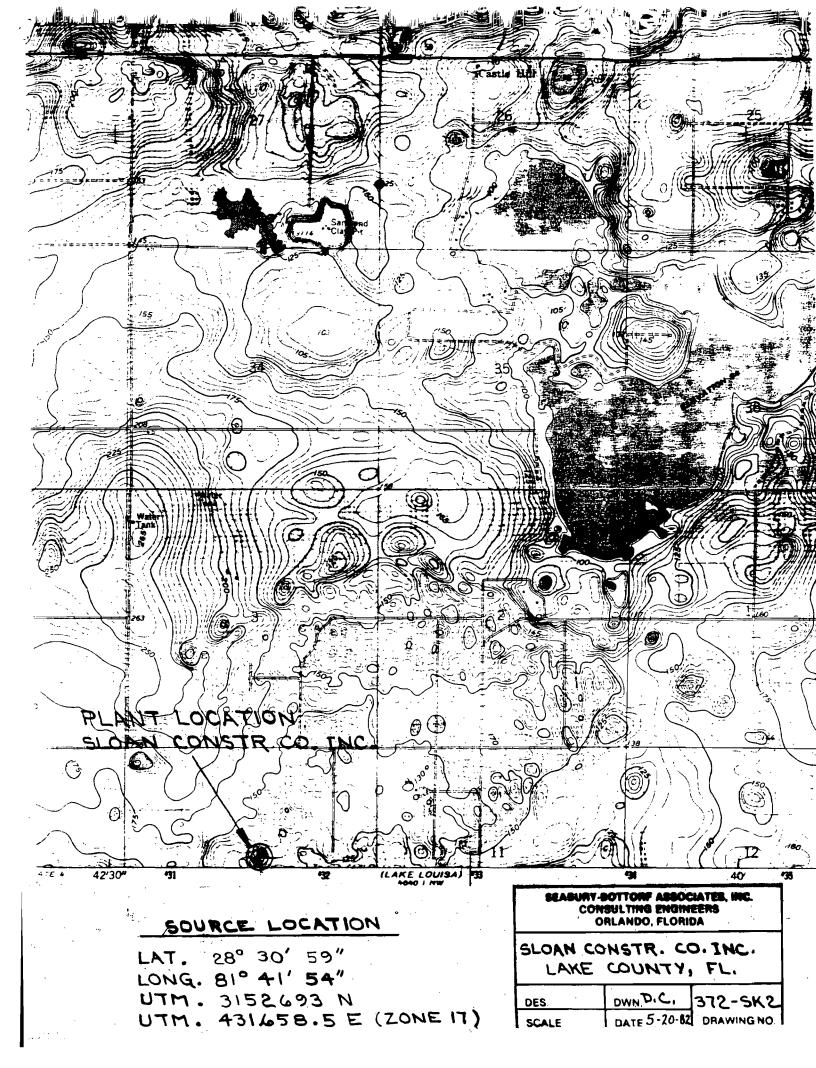


FLOW DIAGRAM

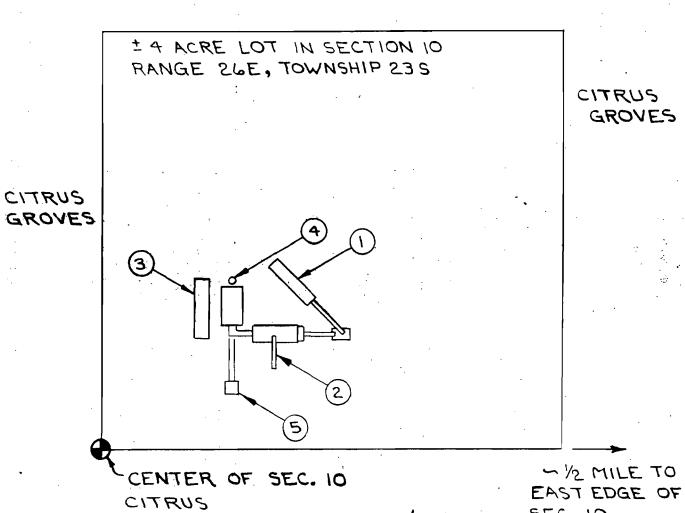
SEABURY-BOTTORF ASSOCIATES, INC.
CONSULTING ENGINEERS
WINTER PARK, FLORIDA

SLOAN CONSTRUCTION CO. INC.
LAKE COUNTY FLORIDA

DES. DWM. J.S. 372-5K-1
SCALE N.S. DATE 5-20-82 DRAWING NO.



CITRUS GROVES



GROVES

SEC. 10

SEABURY BOTTORF ASSOCIATES, INC. CONSULTING ENGINEERS ORLANDO, FLORIDA

SLOAN CONSTRUCTION CO. INC. LAKE COUNTY, FL.

1

DWN. D. C. 372-5K3 SCALE NONE DATE 5-20-82 DRAWING NO.



BOB GRAHAM GOVERNOR JACOB D. VARN: SECRETARY

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

September 18, 1979

Mr. John W. Seabury, P.E. Seabury-Bottorf Associates, Inc. Consulting Engineers 1020 N. Orlando Avenue Winter Park, Florida 32789

Dear Mr. Seabury:

Thank you for your letter of August 15, 1979, regarding the applicability of the Department's Prevention of Significant Deterioration (PSD) rule. I would like to take this opportunity to clarify the Department's position with respect to the recent decision of the Circuit Court of Appeals for the District of Columbia in Alabama Power Company vs. Costle. The Department has reviewed this case with interest because of its potential impact on our rules. The state's rule was adopted in June of 1978 and submitted to the Environmental Protection Agency for approval prior to that agency's promulgation of its PSD rule. It has always been the Department's intention to seek delegation of PSD permitting from EPA; however, we have been informed by EPA that our present rule is not approvable. Thus, for some time we have been planning revisions to our rule necessary to conform it to the federal rule. This is the situation we found ourselves in when the Alabama Power decision was handed down.

That case involves only the validity of PSD regulations promulgated by EPA and does not directly or indirectly affect the validity of the state rule. However, you have misunderstood the Department's position with respect to amendment of our rule. We still intend to seek delegation of permitting authority, and to obtain such delegation we will have to revise our rule to comply with any amendments to EPA's rule adopted as a result of the Alabama Power case. We certainly do not intend to adopt regulations "identical to the voided regulations" as your letter suggests. Until EPA actually amends its regulations, however, we have no way of knowing what changes we will need to make in our rules.

Mr. John W. Seabury, P.E. Page Two September 18, 1979

The Department is well aware of the problems faced by relocatable asphalt plants and has been considering a number of possible amendments to the PSD rule to relieve this situation. In this respect, we would welcome the participation of all interested parties in any future rulemaking proceedings. Until such time as the state rule is amended, the Department must apply and enforce its present rule. In the meantime, the Department is making every effort to minimize the modeling and monitoring requirements imposed on relocatable asphalt plants consistent with protection of ambient air quality and the requirements of our regulations. If you have any questions concerning the specific requirements for the plant you are seeking to have permitted, I would suggest that you contact Dr. J. P. Subramani of the Bureau of Air Quality Analysis in Tallahassee.

Sincerely

Jacob D. Varn

Secretary

JDW/he

Attachment 2

State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

	Monas			
For Routing To District Offices				
To:	l netn ·			
To:	Loctn.:			
To:	Loctn.:			
From:	Date:			

DER JUL 20 1982 BAOM

ST. JOHNS RIVER DISTRICT

TO:

Bill Thomas

OSJ-82-1821

THROUGH:

A. Senkevich TM

THROUGH:

T. Hunnicutt

FROM:

c. collins cm c

DATE:

July 22, 1982

SUBJECT:

Preliminary Determination

Sloan Construction Company

AC35-56301

Our comments on the Preliminary Determination are as follows:

- State in the permit the NSPS of .04 GDSF instead of 8.28 lbs./hr. The .04 GDSF is the standard and is what we need on the permit, should they violate the standard. The concentration could be as high as .08 GDCF and if the flow rates are in error, the total result would be less than 8.28 lbs./hr. This is very important, please change it. Say .04 GDSF with a maximum limit of 8.28 lbs./hr. but set forth the .04 standard.
- The next item that is very critical, is the fact that Sloan plans to use recycled asphalt. The exact mix (i.e. the standard DOT recycled mix) should be spelled out and tested at that mix. Many plants have failed the stack tests using recycled asphalt.
- 3. Of a general nature, we wish to comment on the fact that we believe the baghouse fabric material will be adversely affected by the sticky nature of the oils that will be released from the volatilization of the recycled asphalt. We feel that a scrubber would be better to control these particles. But there is another reason, only the exact mix should be spelled out in the permit.

CMC:es

cc: Clair Fancy

Steve Smallwood







AIR POLLUTION SOURCES CERTIFICATE OF COMPLETION OF CONSTRUCTION*

PERMIT NO	AC 35-56301	DATE:	November 18, 198	32
Company Nam	e: Sloan Construction Co.	. Inc. County:	Lake	· · ·
Source Identifi	ication(s): Asphalt Plant			
Actual costs of	serving pollution control purpose: \$ _	175,000.00		
Operating Rate	es: Product Rate Tons/Hr.	Design Capacity:	200 Tons/Hr.	
Expected N	Normal 160 to 200 Tons/Hr.			'Hr.
Date of Compl	iance Test: October 14 & 18, 1	. 982 (At	tach detailed test report)	***
Test Results:	Pollutant	Actual Discharge Lbs./H	Ir. Allowed Discharge	Lbs./Hr.
	Particulate/SO2	7.2/13.8	5.986/90.2	
	Particulate/SO ²	2.02/17.1	5.434/90.2	·
	Parti u ulate/SO ²	1.59/16.9	4.953/90.2	
This is to certi	red in operation: August 25, 1 ify that, with the exception of deviation to construct and Construction	Ins noted**, the construction		
A. Applican		V.	L. Ashmo	u)
	Name of Person Signing (Type) 7 23, 1982 Telephone:	803/271-9090	Executive	Pepresentative and Title Vice President
	onal Engineer: Seabury		lu W	Jeal ery
Seabury	Name of Person Signing (Type) -Bottorf Associates, Inc.	Florida Regis	Signature of Profession tration No. 8719	al Engineer
3702 Si	Company Name lver Star Rd.	Date:	November 18, 1982	ESS THE STATE OF T
Orlando	, Florida 32808		(Seal)	
305/298	Mailing Address -0846			The state of the s

^{*}This form, satisfactorily completed, submitted in conjunction with an existing application to construct permit and payment of application processing fee will be accepted in lieu of an application to operate.

^{**} As built, if not built as indicated include process flow sketch, plot plan sketch, and updates of applicable pages of application form.

^{***}Report of Emission Test previously submitted.