KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
352/377-5822 ▪ FAX/377-7158

KA519-08-13
June 11, 2009

Nancy E. Knight
FDEP Southwest District
13051 N Telecom Parkway
Temple Terrace, FL 33637-0926

Subject: Submittal of Air Operation Permit Renewal
C. W. Roberts Contracting Inc. – Wildwood Asphalt Plant
Operation Permit No.: 7775176-002-AO
Second Request for Additional Information

Dear Mrs. Knight,

On behalf of C.W. Roberts Contracting, Inc. (CWR), I am submitting the following information in response to your letter to Charles W. Roberts requesting additional information dated February 18, 2009. I appreciate your allowance for additional time per emails on May 8 and June 11, 2009 (through June 19, 2009). Please note the email version of the package does not include the signature of the authorized representative. The hardcopies do include that signature. The format of responses is provided in the sequence of requested information. Four copies of the response are included.

Please note the response information refers to the conference call on May 5, 2009 with FDEP personnel (Mara Nasca, Cindy-Zhang Torres, Nancy Knight and Ronni Moore) and C.W. Roberts personnel (myself, Joseph Shuler, and Angela Morrison Uhland—legal counsel).

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1. Emissions Unit Information

Answer: Based on the discussion of the conference call on May 5, 2009, a revised operation renewal permit application is attached (Attachment 1). The revised application provides potential emissions from the facility operating without RAP crushing and with RAP crushing. The potential emissions of the hypothetical RAP crushing system used for emissions calculations is of a crushing system that can easily crush over 200 tons per hour. The facility is currently permitted to crush up to 200 tons per hour. The following conservative assumptions of the hypothetical crusher unit were performed for the emissions calculations as reasonable assurance of compliance of the existing permit conditions.

As a conservative assumption in this application, the hypothetical crusher unit engines (engine for crusher and engine for screens and conveyors) are assumed to be non-electric and consume twice the amount of fuel needed for crushing 200 ton RAP per hour. Based on this conservative annual fuel consumption, such a unit consumes 32,000 gal/yr to crush 200,000 tons/yr of RAP. However, the air construction permit application from

2002 proposed an even more conservative assumed fuel consumption of 50,770 gal/yr. For this application, emissions information is based on the higher amount of 50,770 gal/yr.

As an additional conservative measure, the potential fugitive particulate matter emissions from the entire crusher unit (crusher, screens, conveyors, and material handling) are doubled. These assumptions should provide a conservative estimate of the potential annual emissions from any RAP crusher system owned or operated by CWR (or other company) having an AG permit that might be used at the Wildwood facility (due to the limits on fuel consumption and material usage

Please note the crusher unit ID that I referred to in the 2002 air construction permit application, 7775158-001-AG was the wrong crusher AG permit number. Dickson Dibble of FDEP, by telephone, tells me that the internal FDEP database provides specifics of all crusher units and this crusher was registered to Lee Hoffman d.b.a. Hoffman Demolition. The correct AG number for CWR's crusher is 7775155. This crusher remains active under permit 7775155-002-AG.

Any RAP crusher operated on-site at the Wildwood facility must have an air general (AG) permit and tested accordingly. In addition to submittal of the information required by AG permitting, any AG-permitted crusher unit to be moved to Wildwood that is to be operated at the Wildwood site in a manner that is not representative of conditions existing during the most recent compliance test, CWR proposes to inform the SW District with the relocation notice, to retest the unit at the Wildwood site within 30 days of the unit arriving at Wildwood, and to notify the Department within 15 days of the scheduled testing. A unit that operates in a manner <u>not</u> representative of a prior compliance test would be any crusher unit that includes replaced or additional equipment that was not present during most recent testing or if the unit was tested with any material having lower emission factors than that to be crushed at Wildwood. Based on my engineering judgment and experience, emissions of crushed stone, typical C&D debris, or crushed concrete have higher emissions than RAP because RAP includes asphalt bitumen which acts as a binder for dust. In reality, the CWR crushers, including those at the Wildwood facility, are exclusively used for RAP crushing. The likelihood of testing on other than RAP is very unlikely.

The proposed specific additional testing requirements should provide conservative and reasonable assurance that the crusher unit is operating in a representative manner within the permitted VE limits and appear to be beyond what the SW District has required for other similar asphalt facilities (see e.g., 1010041-009-AO).

<u>Applicability of 40 CFR 60, subpart IIII:</u> CWR agrees that if engines used at the facility are subject to stationary Compression Ignition Internal Combustion Engines (CI ICE) NSPS, Subpart IIII (40 CFR 60.4200(a)), CWR must comply with this rule. As such, the permit should reflect requirements of this new rule.

Of the three CWR-operated crushers and the many potential crusher units that are AG-permitted and could operate at Wildwood, the relevant information of the subpart applicability, e.g., unit manufacturer year and model, is provided in each AG application and input to the internal FDEP database. Should another RAP crusher be relocated to the Wildwood site (whether it is owned and operated by CWR or another company), CWR will be providing the AG permit number with the relocation notification, and the NSPS applicability information for that unit should be accessible to the SW District through the FDEP database. In addition, NSPS compliance information from the manufacturer of the crusher engine can be provided by CWR to the SW District if requested for any crusher units brought on-site to the Wildwood facility.

2. Required Documentation

Answer: Please find enclosed in Attachment 2, the requested documentation that shows crushing for the year which occurred in June and July 2008.

If you have any questions concerning the application, please call me at (352) 377-5822.

Sincerely,

Max Lee, Ph.D., P.E.
KOOGLER & ASSOCIATES

6/10/09
Date

To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this Application for Air Permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection.

P.E. Seal 58091

cc: via email
Mara Nasca, FDEP
Cindy Zhang-Torres, FDEP
Ronni Moore, FDEP
Angela Morrison-Uhland, Hopping Green, and Sams, P.A.
Joseph Shuler, C. W. Roberts Contracting, Inc.

ATTACHMENT 1

AIR PERMIT MODIFICATION APPLICATION

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR NON-TITLE V AIR PERMIT RENEWAL

See Instructions for Form No. 62-210.900(4)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: **C W Roberts Contracting, Inc.**	
2. Site Name: Wildwood Asphalt Plant	
3. Facility Identification Number: 7775176	4. Facility Status Code: A

Application Contact

1. Name and Title of Application Contact: Maxwell Lee, Ph.D., P.E., Senior Project Engineer
2. Application Contact Mailing Address: Organization/Firm: Koogler & Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: FL Zip Code: 32609
3. Application Contact Telephone Numbers: Telephone: (352)377-5822 Fax: (352) 377- 7158

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	

Owner/Authorized Representative

1. Name and Title of Owner/Authorized Representative: Charles W. Roberts, President

2. Owner/Authorized Representative Mailing Address:

   Organization/Firm: C. W. Roberts Contracting, Inc.
   Street Address: P.O. Box 188
   City: Hosford State: FL Zip Code: 32334

3. Owner/Authorized Representative Telephone Numbers:
   Telephone: (850)379-8116 Fax: (850)379-8188

4. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this Application for Air Permit. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

Charles W Roberts III — Signature

6/15/09 — Date

* Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
001	CMI drum mix asphalt plant	NA	
unknown	Crushing Operations	NA	
	(fee previously submitted for AO renewal)		

Application Processing Fee

Check one: [ ] Attached - Amount: $_____ [X] Not Applicable

Application Comment

Project is to address concerns of FDEP per conference call discussion on 5/5/2009 with FDEP personnel (Mara Nasca, Cindy-Zhang Torres, Nancy Knight and Ronni Moore) and C.W. Roberts personnel (Joseph Shuler, Angela Morrison Uhland—legal counsel, and Max Lee-project engineer,).

This revised permit application provides potential emissions from the facility and a comparison of potential emissions for A) only operating the asphalt plant and B) operating the asphalt plant and the RAP crusher. Note the facility-wide fuel usage is limited to 1.2 mmgal/yr and product (asphalt and RAP crushed) to 500,000 tons per year.

As a conservative assumption, the RAP crusher potential emissions are based on a diesel engine with twice the power (fuel usage 15.5gal/hr x 2 = 31 gal/hr) of a unit capable of 200 ton of RAP crushed/hr. The permit currently allows up to 200 tons per hour. The annual fuel usage estimate for the crushing system in 2002 was more conservative than the above assumption (50.77 TGB in 2002, versus 31gal/200ton x 200,000 ton/yr = 31 TGB in this application). Therefore, potential annual emissions are based in this application on the 2002 annual fuel usage of 50.77 gal/yr. Annual potential emissions remain below the Title V threshold (100 tpy). Another conservative assumption is that the total crusher unit fugitive PM emissions are doubled the calculated amount. See attachment A, pg 3. of this application.

This application will allow no new construction or modification and only provides revisions of emission estimates previously submitted.

II. FACILITY INFORMATION

Facility Contact

1. Name and Title of Facility Contact: **Charles W. Roberts, President**
2. Facility Contact Mailing Address: Organization/Firm: **C. W. Roberts Contracting, Inc.** Street Address: **P. O. Box 188** City: **Hosford** State: **FL** Zip Code: **32334**
3. Facility Contact Telephone Numbers: Telephone: **(850) 379-8116** Fax: **(850) 379-8188**

Facility Supplemental Requirements

1. Area Map Showing Facility Location: [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested
2. Facility Plot Plan: [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested
3. Process Flow Diagram(s): [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested

Facility Comment

No changes to the current permit conditions are requested.

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section must be completed for each emissions unit addressed in this Application for Non-Title V Air Permit Renewal. If submitting the form in hard copy, indicate, in the space provided at the top of each page, the Emissions Unit ID of the emissions unit addressed on the page, as given in the unit's most current air operation permit.

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): **CMI Drum mix asphalt plant**	
2. Emissions Unit Status Code: **A**	3. Long-Term Reserve Shutdown Date:
4. Control Equipment Method/Description (limit to 200 characters per device or method): **CMI Roto-Aire 318P Fabric Filter baghouse** Code 016	

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:		mmBtu/hr
2. Maximum Incineration Rate:	lb/hr	tons/day
3. Maximum Process or Throughput Rate:		
4. Maximum Production Rate: 400 tph, 500,000 ton/year		
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	8760 hours/year

Emissions Unit ID___001_____

Emissions Unit Supplemental Requirements

1. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested
2. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Previously submitted, Date:_9/19/2008_____
3. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested
4. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [ ] Not Applicable [X] Waiver Requested
5. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [ ] Not Applicable

Emissions Unit Comment

No changes to current permit requested.

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section (including subsections A through G as required) must be completed for each emissions unit addressed in this Application for Air Permit. If submitting the application form in hard copy, indicate, in the space provided at the top of each page, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application.

A. GENERAL EMISSIONS UNIT INFORMATION

Emissions Unit Description and Status

1. Type of Emissions Unit Addressed in This Section: (Check one)

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a single process or production unit, or activity, which produces one or more air pollutants and which has at least one definable emission point (stack or vent).

[ ] This Emissions Unit Information Section addresses, as a single emissions unit, a group of process or production units and activities which has at least one definable emission point (stack or vent) but may also produce fugitive emissions.

[X] This Emissions Unit Information Section addresses, as a single emissions unit, one or more process or production units and activities which produce fugitive emissions only.

2. Description of Emissions Unit Addressed in This Section (limit to 60 characters):
RAP crusher and screen conveyor subject to NSPS Subpart OOO and diesel engines for RAP crushing equipment

3. Emissions Unit Identification Number:
ID: **002 (assumed new ID)**
[ ] No ID
[ ] ID Unknown

4. Emissions Unit Status Code: **A**	5. Initial Startup Date: **2002 (per -001-AC and 002-AO)**	6. Emissions Unit Major Group SIC Code: **29**

7. Emissions Unit Comment: (Limit to 500 Characters)

The unit is intended to be used periodically for supplying RAP to the asphalt mix. The unit can consist of any air general permitted RAP crushing system.

Some portable crusher engines maybe subject to NSPS subpart IIII. If applicable engines must comply.

Emissions Unit Control Equipment

1. Control Equipment/Method Description (limit to 200 characters per device or method):

N/A

2. Control Device or Method Code(s):

Emissions Unit Details

1. Package Unit:
   Manufacturer:
   Model Number:
2. Generator Nameplate Rating: MW
3. Incinerator Information:
   Dwell Temperature: °F
   Dwell Time: seconds
   Incinerator Afterburner Temperature: °F

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate: **N/A**
2. Maximum Incineration Rate: **N./A** lb/hr
3. Maximum Process or Throughput Rate: **200 tph and 200,000 tpy**
4. Maximum Production Rate:
5. Requested Maximum Operating Schedule:
   24 hours/day **7** days/week
   52 weeks/year **8760** hours/year
6. Operating Capacity/Schedule Comment (limit to 200 characters):

B. EMISSION POINT (STACK/VENT) INFORMATION

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram? **Portable**	2. Emission Point Type Code: **3**	
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking (limit to 100 characters per point): **This unit includes a RAP crusher, and screening and conveying equipment.**		
4. ID Numbers or Descriptions of Emission Units with this Emission Point in Common: **NA**		
5. Discharge Type Code: **F**	6. Stack Height: **N/A** feet	7. Exit Diameter: **N/A** feet
8. Exit Temperature: **ambient** °F	9. Actual Volumetric Flow Rate: **N/A** acfm	10. Water Vapor: **N/A** %
11. Maximum Dry Standard Flow Rate: **N/A** dscfm	12. Nonstack Emission Point Height: **NA** feet	
13. Emission Point UTM Coordinates: Zone: East (km): North (km):		
14. Emission Point Comment (limit to 200 characters): **Emissions points defined in each crusher AG permit**		

C. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Mineral Products: Stone Quarry/Processing: Primary Crushing**		
2. Source Classification Code (SCC): **3-05-020-01**	3. SCC Units: **Tons Processed**	
4. Maximum Hourly Rate: **200**	5. Maximum Annual Rate: **200,000**	6. Estimated Annual Activity Factor: **NA**
7. Maximum % Sulfur: **NA**	8. Maximum % Ash: **NA**	9. Million Btu per SCC Unit: **NA**
10. Segment Comment (limit to 200 characters): **Annual rate is 40 percent of current facility-wide 500,000-ton annual asphalt production limit.**		

Segment Description and Rate: Segment 2 of 2

1. Segment Description (Process/Fuel Type) (limit to 500 characters): **Internal Combustion Engines: Industrial Diesel: Reciprocating**		
2. Source Classification Code (SCC): **2-02-001-02**	3. SCC Units: **Thousand gallons burned (TGB)**	
4. Maximum Hourly Rate: **0.0310**	5. Maximum Annual Rate: **50.77**	6. Estimated Annual Activity Factor: **NA**
7. Maximum % Sulfur: **0.5**	8. Maximum % Ash: **NA**	9. Million Btu per SCC Unit: **137 mmBtu/TGB**
10. Segment Comment (limit to 200 characters): **The fuel usage is based on twice the size of a large RAP crushing unit:** **Caterpillar C18 engine (735 HP) + 100 HP to run screens and conveyors = 835 HP** **Crusher operation for C18 engine = 200 tons of RAP per hour** **137,000 Btu/gal (AP-42 App. A), diesel fuel** **Maximum energy use rates: (835 HP) x 2545 Btu per hr/HP = 2,125,075 Btu/hr = 2.125 MMBtu/hr** **2.125 mmbtu/hr x 2 (conservative assumption) = 4.25 mmbtu/hr** **4.25 mmbtu/hr x 1000gal/137 mmbtu = 0.03102 1000gal/hr = 31.02 gal/hr** **31.02 gal/200 ton=0.155 gal/ton** **0.155 gal/ton x 200,000 tons/yr = 31,000 gal/yr = 31.0 TGB** **Use original annual usage of 2002 application 50.77 TGB**		

Emissions Unit Information Section ___1___ **of** ___1___

Pollutant Detail Information Page ___1___ **of** ___6___

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: **PM**		2. Pollutant Regulatory Code: **EL**
3. Primary Control Device Code: **NA**	4. Secondary Control Device Code: **NA**	5. Total Percent Efficiency of Control:
6. Potential Emissions: **6.0** lb/hour **3.4** tons/year		7. Synthetically Limited? [**X**]
8. Emission Factor: **see below** Reference: **see below**		9. Emissions Method Code: **3B**
10. Calculation of Emissions (limit to 600 characters): **See Attachment A**		
11. Pollutant Potential Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code: **NA**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

Emissions Unit Information Section ___1__ **of** ___1___

Pollutant Detail Information Page ___2___ **of** ___6___

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: **PM10**		2. Pollutant Regulatory Code: **NS**
3. Primary Control Device Code: **016**	4. Secondary Control Device Code: **NA**	5. Total Percent Efficiency of Control:
6. Potential Emissions: **4.2** lb/hour **2.4** tons/year		7. Synthetically Limited? [**X**]
8. Emission Factor: **see below** Reference: **see below**		9. Emissions Method Code: **3B**
10. Calculation of Emissions (limit to 600 characters): **See Attachment A**		
11. Pollutant Potential Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code: **NA**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: **SO2**		2. Pollutant Regulatory Code: **EL**
3. Primary Control Device Code: **NA**	4. Secondary Control Device Code: **NA**	5. Total Percent Efficiency of Control:
6. Potential Emissions: **1.23** lb/hour **1.01** tons/year		7. Synthetically Limited? [**X**]
8. Emission Factor: **0.29 lb/MMBtu** Reference: **AP-42, Table 3.3-1**		9. Emissions Method Code: **3B**
10. Calculation of Emissions (limit to 600 characters): **See Attachment A**		
11. Pollutant Potential Emissions Comment (limit to 200 characters): **Annual facility-wide fuel oil usage limited to 1.2 million gallons in accordance with Rule 62-210.300(3)(c).**		

Allowable Emissions Allowable Emissions ___1___ of ___1___

1. Basis for Allowable Emissions Code: **N/A**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: **NOx**	2. Pollutant Regulatory Code: **NS**	
3. Primary Control Device Code: **NA**	4. Secondary Control Device Code: **NA**	5. Total Percent Efficiency of Control:
6. Potential Emissions: **18.74** lb/hour **15.34** tons/year		7. Synthetically Limited? [**X**]
8. Emission Factor: **4.41 lb/MMBtu** Reference: **AP-42, Table 3.3-1**		9. Emissions Method Code: **3B**
10. Calculation of Emissions (limit to 600 characters): **See Attachment A**		
11. Pollutant Potential Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code: **NA**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: **CO**	2. Pollutant Regulatory Code: **NS**	
3. Primary Control Device Code: **NA**	4. Secondary Control Device Code: **NA**	5. Total Percent Efficiency of Control:
6. Potential Emissions: **4.04** lb/hour **3.3** tons/year		7. Synthetically Limited? [**X**]
8. Emission Factor: **0.95 lb/MMBtu** Reference: **AP-42, Table 3.3-1**		9. Emissions Method Code: **3B**
10. Calculation of Emissions (limit to 600 characters): **See Attachment A**		
11. Pollutant Potential Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code: **NA**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

Emissions Unit Information Section ___1___ of ___1___

Pollutant Detail Information Page ___6___ of ___6___

D. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION

Potential Emissions

1. Pollutant Emitted: **VOC**		2. Pollutant Regulatory Code: **NS**
3. Primary Control Device Code: **NA**	4. Secondary Control Device Code: **NA**	5. Total Percent Efficiency of Control:
6. Potential Emissions: **1.53** lb/hour **1.25** tons/year		7. Synthetically Limited? [**X**]
8. Emission Factor: **0.36 lb/MMBtu** Reference: **AP-42, Table 3.3-1**		9. Emissions Method Code: **3B**
10. Calculation of Emissions (limit to 600 characters): **See Attachment A**		
11. Pollutant Potential Emissions Comment (limit to 200 characters):		

Allowable Emissions Allowable Emissions _____ of _____

1. Basis for Allowable Emissions Code: **NA**	2. Future Effective Date of Allowable Emissions: **NA**
3. Requested Allowable Emissions and Units:	4. Equivalent Allowable Emissions: lb/hour tons/year
5. Method of Compliance (limit to 60 characters):	
6. Allowable Emissions Comment (Desc. of Operating Method) (limit to 200 characters):	

E. VISIBLE EMISSIONS INFORMATION
(Only Emissions Units Subject to a VE Limitation)

Visible Emissions Limitation: Visible Emissions Limitation ___1___ of __1____

1. Visible Emissions Subtype: **VE15 and VE10**	2. Basis for Allowable Opacity: [X] Rule [ ] Other
3. Requested Allowable Opacity: Normal Conditions: **10 and 15** %Exceptional Conditions: % Maximum Period of Excess Opacity Allowed: min/hour	
4. Method of Compliance: **Method 9**	
5. Visible Emissions Comment (limit to 200 characters): **Testing per AG permit requirements. Crusher units subject to NSPS: 40 CFR 60.672 (c) – crusher subject to 15% opacity limit. 40 CFR 60.672 (b) – transfer points on belt conveyors or screening operations are subject to 10% opacity limit.** **It is proposed that if most recent testing of the unit prior to unit brought on to site, is not representative of the on-site operation, the unit will be retested within 30 days and with notice to FDEP 15 days prior to testing.** **"Not representative" means new or replaced fugitive emitting equipment since testing or testing with a material having lower emissions than that of material to be crushed on site.**	

F. CONTINUOUS MONITOR INFORMATION
(Only Emissions Units Subject to Continuous Monitoring)

Continuous Monitoring System: Continuous Monitor _____ of _____

1. Parameter Code: **NA**	2. Pollutant(s):
3. CMS Requirement: [ ] Rule [ ] Other	
4. Monitor Information: Manufacturer: Model Number: Serial Number:	
5. Installation Date:	6. Performance Specification Test Date:
7. Continuous Monitor Comment (limit to 200 characters):	

G. EMISSIONS UNIT SUPPLEMENTAL INFORMATION

Supplemental Requirements

1. Process Flow Diagram [**X**] Attached, Document ID:___**B** ___ [ ] Not Applicable [ ] Waiver Requested
2. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
3. Detailed Description of Control Equipment [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
4. Description of Stack Sampling Facilities [ ] Attached, Document ID:_____ [ ] Not Applicable [**X**] Waiver Requested
5. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Previously submitted, Date:_____ [**X**] Not Applicable
6. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [**X**] Not Applicable [ ] Waiver Requested
7. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [**X**] Not Applicable [ ] Waiver Requested
8. Supplemental Information for Construction Permit Application [ ] Attached, Document ID:_____ [**X**] Not Applicable
9. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [**X**] Not Applicable
10. Supplemental Requirements Comment:

ATTACHMENT A

Facility Emissions

C. W. Roberts Contracting, Inc.
Wildwood, Sumter County, Florida

Attachment A: June 2009

Potential Emissions Calculations
Counterflow Drum Mix Asphalt Plant

Facility-wide limits: 1.2 mmgal/yr of fuel burned
500,000 tn/yr of the sum of asphalt produced and RAP crushed
RAP crushed portion limited to 200,000 tn/yr

application year	PM		SO2		NOx		CO		VOC	
	Asphalt Plant	Asphalt Plant +Crushing	Asphalt Plant	Asphalt Plant +Crushing	Asphalt Plant	Asphalt Plant +Crushing	Asphalt Plant	Asphalt Plant +Crushing	Asphalt Plant	Asphalt Plant +Crushing
	ton/yr		ton/yr		ton/yr		ton/yr		ton/yr	
2002	8.2	6.1	59.95	59.95	13.8	29.1	32.5	35.8	8.0	9.3
2009	12.4	11.7	59.95	36.98	13.8	23.6	33.1	23.4	8.0	6.1
column numbers	1	2	3	4	5	6	7	8	9	10

column notes
1- PM- 2009 emissions higher for asphalt plant due to inclusion of more fugitive emissions
2- PM- 2009 emissions higher for asphalt plant + crushing due to inclusion of more fugitive emissions
3- SO2 -same emissions
4- SO2- 2002 emissions calculation assumed all SO2 emissions based on fuel burned for asphalt production
5- NOx- same emissions
7- CO- 2002 emissions did not account for fugitve CO from silos
9- VOC- same emissions

6, 8, and 10- NOx,CO,VOC- Total facility asphalt and crushing limited to 500,000 tn/yr. 2002 emissions did not account for reduction of asphalt production (total 300,000 tn/yr) when crusher operated at capacity (200,000 tn/yr). 2009 emissions does account.

TABLE PM Attachment A June 2009
C W. Roberts Contracting, Inc.
Wildwood, Sumter County, Florida

Potential Emissions Calculations
Counterflow Drum Mix Asphalt Plant

ASPHALT PLANT ONLY
Particulate Matter (PM)

Assumed Fugitive Emission Points		Emission Factor		Process Rate			PM Potential Emissions			
	TOTAL PM:						**15.46**	**lb/hr**	**12.24**	**TPY**
	TOTAL PM10: (8)						**10.82**		**8.57**	
	RAP Feed System (EU001) (assume RAP not crushed on-site)									
1-01	Front End Loader to Portable Recycle System Hopper	0 00014	lb/ton (1)	160	TPH	200,000 TPY	0 02	lb/hr	0 014	TPY
1-02	Portable Recycle System Hopper to Underhopper Conveyor Belt	0 00014	lb/ton (1)	160	TPH	200,000 TPY	0 02	lb/hr	0 014	TPY
1-03	Underhopper Conveyor Belt to 4x8 Screen	0 00014	lb/ton (1)	160	TPH	200,000 TPY	0 02	lb/hr	0 014	TPY
1-04	4x8 Screen	0 00360	lb/ton (1)	160	TPH	200,000 TPY	0 58	lb/hr	0 360	TPY
1-05	4x8 Screen to Drum Mix Plant Feeder Conveyor Belt	0 00014	lb/ton (1)	160	TPH	200,000 TPY	0 02	lb/hr	0 014	TPY
1-06	Drum Mix Plant Feeder Conveyor Belt to Drum Mix Plant	0 00014	lb/ton (1)	160	TPH	200,000 TPY	0 02	lb/hr	0 0	TPY
	TOTAL PM:						0 69	lb/hr	0 43	TPY
	* assume 10% of 200 tph and 200,000 tpy is screened to a pile									
	Drum Mix Asphalt Plant (EU001)									
4-01 to 4-06	Front End Loader to Cold Feed Storage Bin 1-6	0 00014	lb/ton (1)	400	TPH	500,000 TPY	0 06	lb/hr	0 0	TPY
4-07 to 4-12	Cold Feed Storage Bin 1- 6 to Conveyor	0 00014	lb/ton (1)	400	TPH	500,000 TPY	0 06	lb/hr	0 0	TPY
4-13	Conveyor to 5x12 Single Deck Screen	0 00014	lb/ton (1)	400	TPH	500,000 TPY	0 06	lb/hr	0 0	TPY
4-14	5x12 Single Deck Screen	0 00360	lb/ton (1)	400	TPH	500,000 TPY	1 44	lb/hr	0 9	TPY
4-15	5x12 Single Deck Screen to SC-3050 Conveyor Belt	0 00014	lb/ton (1)	400	TPH	500,000 TPY	0 06	lb/hr	0 0	TPY
4-16	SC-3050 Conveyor Belt to Drum Mix Plant	0 00014	lb/ton (1)	400	TPH	500,000 TPY	0 06	lb/hr	0 0	TPY
4-17	Drum Mix Plant (vented to Baghouse)	0 04	gr/dscf	38070	dscfm	500,000 TPY	13 05	lb/hr	8 16	TPY
4-21	Raw Material Storage Piles	5 8882	lb/day/acre (4)	NA		730 acres-day/yr (6)	N/A		2 1	TPY (7)
	TOTAL PM:						14.77	lb/hr	11 4	TPY
	TOTAL PM (EU001)						**15 46**	**lb/hr**	**11.81**	**TPY**
	Portable RAP Crushing System (EU002)									
2-01	Front End Loader to Hopper	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-02	hopper to screening	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-03	Screening	0 00360	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-04	Screening to Oversize Belt	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-05	Oversize Belt to Crusher	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-06	Crusher	0 0012	lb/ton (5)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-07	Crusher to Crusher Return Belt	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-08	Crusher Return Belt to Underscreen Belt	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-09	Screening to Underscreen Belt	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-10	Underscreen Belt to Short Belt	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-11	Short Belt to Stacker Belt	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
2-12	Stacker Belt to Storage Pile	0 00014	lb/ton (1)	0	TPH	0 TPY	0 00	lb/hr	0 0	TPY
						Sum =	0 00	lb/hr	0 00	TPY
						2 x Sum (10) =	0 00	lb/hr	0 00	TPY
	Portable RAP Crushing Engine (EU002)									
3-01	Engine Exhaust (9)	0 31	lb/mmbtu	0	mmbtu/hr	0 mmbtu/yr	0 00	lb/hr	0 00	TPY
	TOTAL PM:						**0.0**	**lb/hr**	**0 0**	**TPY**

(1) Emission Factor based on AP-42, Table 11 19 2-2 tertiary crushing controlled by water spray
(2) FYI- totally enclosed drop point with baghouse fan suction
(3) Emission Factor based on AP-42, Table 11 1-14 Assume V = -0 05 and T = 325F
(4) Emission Factor based on EPA's Technical Report Data, Control of Open Fugitive Dust Sources, EPA-450/3-88-008, p 4-17 Assumes s = 19%, p = 110 days, f = 13 3%
(5) Emiss Factor 0 00059 (PM10) x 2 1 = 0 0012 lb/ton, AP-42, Table 11 19 2-2
(6) Based on the assumption that the total pile area of 2 acres and the pile(s) are continuously active for 365 days per year
(7) Emissions based on the product of the emission factor, total pile area, and days the pile(s) are continuously active
(8) Conservatively assume PM10 = 0 7 PM Baghouse controlled drum mix (AP-42, 11 1-3) PM10/PM = 0 023/0 033 Whereas, uncontrolled or less controlled sources will have less wt fraction of PM10/PM
(9) AP-42, Table 3 3-1
(10) Conservatively assume that twice the expected number of pieces of equipment of a RAP crusher are on site

TABLE PM
C. W. Roberts Contracting, Inc.
Wildwood, Sumter County, Florida

Attachment A: June 2009

Potential Emissions Calculations
Counterflow Drum Mix Asphalt Plant

ASPHALT PLANT AND RAP CRUSHER
Particulate Matter (PM)

Assumed Fugitive Emission Points		Emission Factor		Process Rate		PM Potential Emissions	
	TOTAL PM:					**21.80 lb/hr**	**11.67 TPY**
	TOTAL PM10: (8)					**15 26**	**8.17**
	RAP Feed System (EU001)						
1-01	Front End Loader to Portable Recycle System Hopper	0 00014	lb/ton (1)	160 TPH	200,000 TPY	0 02 lb/hr	0 0 TPY
1-02	Portable Recycle System Hopper to Underhopper Conveyor Belt	0 00014	lb/ton (1)	160 TPH	200,000 TPY	0 02 lb/hr	0 0 TPY
1-03	Underhopper Conveyor Belt to 4x8 Screen	0.00014	lb/ton (1)	160 TPH	200,000 TPY	0 02 lb/hr	0 0 TPY
1-04	4x8 Screen	0 00360	lb/ton (1)	160 TPH	200,000 TPY	0 58 lb/hr	0 4 TPY
1-05	4x8 Screen to Drum Mix Plant Feeder Conveyor Belt	0 00014	lb/ton (1)	160 TPH	200,000 TPY	0 02 lb/hr	0 0 TPY
1-06	Drum Mix Plant Feeder Conveyor Belt to Drum Mix Plant	0 00014	lb/ton (1)	160 TPH	200,000 TPY	0 02 lb/hr	0 0 TPY
	TOTAL PM:					0 69 lb/hr	0 43 TPY
	* assume 10% of 200 tph and 200,000 tpy is screened to a pile						
	Drum Mix Asphalt Plant (EU001)						
4-01 to 4-06	Front End Loader to Cold Feed Storage Bin 1-6	0 00014	lb/ton (1)	400 TPH	300,000 TPY	0 06 lb/hr	0 0 TPY
4-07 to 4-12	Cold Feed Storage Bin 1- 6 to Conveyor	0 00014	lb/ton (1)	400 TPH	300,000 TPY	0 06 lb/hr	0 0 TPY
4-13	Conveyor to 5x12 Single Deck Screen	0 00014	lb/ton (1)	400 TPH	300,000 TPY	0 06 lb/hr	0 0 TPY
4-14	5x12 Single Deck Screen	0 00360	lb/ton (1)	400 TPH	300,000 TPY	1 44 lb/hr	0 5 TPY
4-15	5x12 Single Deck Screen to SC-3050 Conveyor Belt	0 00014	lb/ton (1)	400 TPH	300,000 TPY	0 06 lb/hr	0 0 TPY
4-16	SC-3050 Conveyor Belt to Drum Mix Plant	0 00014	lb/ton (1)	400 TPH	300,000 TPY	0 06 lb/hr	0 0 TPY
4-17	Drum Mix Plant (vented to Baghouse)	0 04	gr/dscf	39000 dscfm	300,000 TPY	13 37 lb/hr	5.01 TPY
4-21	Raw Material Storage Piles	5 8882	lb/day/acre (4)	NA	730 acres-day/yr (6)	N/A	2 1 TPY (7)
	TOTAL PM:					15.09 lb/hr	7 8 TPY
	TOTAL PM (EU001)					**15.78 lb/hr**	**8.24 TPY**
	Portable RAP Crushing System (EU002)						
2-01	Front End Loader to Hopper	0 00014	lb/ton (1)	200 TPH	200,000 TPY	0 03 lb/hr	0 0 TPY
2-02	hopper to screening	0 00014	lb/ton (1)	200 TPH	200,000 TPY	0 03 lb/hr	0 0 TPY
2-03	Screening	0 00360	lb/ton (1)	200 TPH	200,000 TPY	0 72 lb/hr	0 4 TPY
2-04	Screening to Oversize Belt	0 00014	lb/ton (1)	180 TPH	180,000 TPY	0 03 lb/hr	0 0 TPY
2-05	Oversize Belt to Crusher	0 00014	lb/ton (1)	180 TPH	180,000 TPY	0 03 lb/hr	0 0 TPY
2-06	Crusher	0 0012	lb/ton (5)	180 TPH	180,000 TPY	0 22 lb/hr	0 1 TPY
2-07	Crusher to Crusher Return Belt	0 00014	lb/ton (1)	180 TPH	180,000 TPY	0 03 lb/hr	0 0 TPY
2-08	Crusher Return Belt to Underscreen Belt	0.00014	lb/ton (1)	200 TPH	200,000 TPY	0 03 lb/hr	0 0 TPY
2-09	Screening to Underscreen Belt	0 00014	lb/ton (1)	20 TPH	20,000 TPY	0 00 lb/hr	0 0 TPY
2-10	Underscreen Belt to Short Belt	0 00014	lb/ton (1)	200 TPH	200,000 TPY	0 03 lb/hr	0 0 TPY
2-11	Short Belt to Stacker Belt	0 00014	lb/ton (1)	200 TPH	200,000 TPY	0 03 lb/hr	0 0 TPY
2-12	Stacker Belt to Storage Pile	0 00014	lb/ton (1)	200 TPH	200,000 TPY	0 03 lb/hr	0 0 TPY
					Sum =	1 18 lb/hr	0 59 TPY
					2 x Sum (10) =	2 36 lb/hr	1 18 TPY
	Portable RAP Crushing Engine (EU002)						
3-01	Engine Exhaust (9)	0 31	lb/mmbtu	4 25 mmbtu/hr	6955 49 mmbtu/yr	1 32 lb/hr	1 08 TPY
	TOTAL PM:					**6.0 lb/hr**	**3.4 TPY**
	TOTAL PM10 (8).					**4.2 lb/hr**	**2.4 TPY**

(1) Emission Factor based on AP-42, Table 11 19 2-2 tertiary crushing controlled by water spray
(2) FYI- totally enclosed drop point with baghouse fan suction
(3) Emission Factor based on AP-42, Table 11 1-14 Assume V = -0 05 and T = 325F
(4) Emission Factor based on EPA's Technical Report Data, Control of Open Fugitive Dust Sources, EPA-450/3-88-008, p. 4-17 Assumes s = 19%, p = 110 days, f = 13.3%
(5) Emiss Factor 0 00059 (PM10) x 2.1 = 0.0012 lb/ton, AP-42, Table 11.19 2-2
(6) Based on the assumption that the total pile area of 2 acres and the pile(s) are continuously active for 365 days per year
(7) Emissions based on the product of the emission factor, total pile area, and days the pile(s) are continuously active
(8) Conservatively assume PM10 = 0.7 PM Baghouse controlled drum mix (AP-42, 11 1-3) PM10/PM = 0 023/0 033 Whereas, uncontrolled or less controlled sources will have less wt fraction of PM10/PM
(9) AP-42, Table 3 3-1 6955 49 mmbtu/yr based on 50.77 gal/yr @ 137 mmbtu/1000gal
(10) Conservatively assume that twice the expected number of pieces of equipment of a RAP crusher are on site

TABLE SO2
C W Roberts Contracting, Inc
Wildwood, Sumter County, Florida

Potential Emissions Calculations
Counterflow Drum Mix Asphalt Plant

ASPHALT PLANT ONLY

Sulfur Dioxide (SO_2)													
Emission Point	**Emission Factor**	**Process Rate**								**Potential Emissions**			
Drum Mix Plant (EU001)	0 2398 lb SO2/ton			400 ton/hr	500000 tonasph/yr					95 92	lb/hr	59 95	TPY
TOTAL SO_2										**95 92**	lb/hr	**59.95**	TPY

(1) From 2002 application 1 2 10^6 gal/yr / 500,000 ton/yr = 2 4 gal/ton asphalt
SO2 per ton asphalt 2 4 gal/ton x 7 08 lb/gal(AP42AppA) x 0 01 S x 2 SO2/S = 0 3398 lb SO2/ton asphalt
AP-42, Table 11 1-7 allows reduction factor of SO2 by 0 1 lb/ton = 0 3398 - 0 1 = 0 2398 lb SO2/ton asphalt

RAP CRUSHER AND ASPHALT PLANT

Sulfur Dioxide (SO_2)													
Emission Point	**Emission Factor**	**Process Rate**								**Potential Emissions**			
Drum Mix Plant (EU001)	0 2398 lb SO2/ton			400 ton/hr	300000 tonasph/yr					95 92	lb/hr	35 97	TPY
		asphalt plant production = 500 000 ton/yr minus 200,000 RAP crusher											
	Emission Factor (1) (2)	**Capacity**								**Potential Emissions**			
Engine Exhaust (EU 002)	0 29 lb/mmbtu	4 25 mmbtu/hr(3)	0 0310 1000gal/hr	200 tonRAP/hr	0 000155 1000gal/ton	200000 tonRAP/yr	31 02 1000gal/yr	**50 77 1000gal/yr** *	6955 49 mmbtu/yr				
								* use higher annual fuel usage from 2002 application of 50 777 TGB					
	0 29 lb/mmbtu	4 25 mmbtu/hr(3)							6955 49 mmbtu/yr	1 23	lb/hr	1 01	TPY
TOTAL SO_2										**97 15**	lb/hr	**36 98**	TPY

(1) Emission Factor based on AP-42, Table 1 3-1
(2) 157 x S , S = assume Fuel Sulfur Content is 0 5%
(3) see application, conservatively assume twice the largest HP (835 HP) expected for potential emissions

TABLE NOx
C. W Roberts Contracting, Inc
Wildwood, Sumter County, Florida

Attachment A. June 2009

Potential Emissions Calculations
Counterflow Drum Mix Asphalt Plant

ASPHALT PLANT ONLY

Nitrogen Oxides (NOx)												
Emission Point	Emission Factor			Process Rate					Potential Emissions			
Drum Mix Plant (EU001)	0 055 lb/ton			400 ton/hr	500000 tonasph/yr				22 00	lb/hr	13 8	TPY
TOTAL NOx:									22 0	lb/hr	13 8	TPY

(1) Emission Factor based on AP-42, Table 11 1-7

RAP CRUSHER AND ASPHALT PLANT

Nitrogen Oxides (NOx)												
Emission Point	Emission Factor			Process Rate					Potential Emissions			
Drum Mix Plant (EU001)	0 055 lb/ton			400 ton/hr	300000 tonasph/yr				22 00	lb/hr	8 3	TPY
					asphalt plant production = 500,000 ton/yr minus 200,000 RAP crusher							
	Emission Factor (1) (2)			Capacity					Potential Emissions			
Engine Exhaust (EU 002)	4 41 lb/mmbtu	4 25 mmbtu/hr(3)	0 0310 1000gal/hr	200 tonRAP/hr	0 000155 1000gal/ton	200000 tonRAP/yr	31 02 1000gal/yr	**50 77 1000gal/yr**	6955 49 mmbtu/yr			
								* use higher annual fuel usage from 2002 application of 50 777 TGB				
	4 41 lb/mmbtu	4 25 mmbtu/hr(3)							6955 49 mmbtu/yr	18 74	lb/hr	15 34 TPY

(1) Emission Factor based on AP-42, Table 3 3-1, Diesel Fuel Oil (137 mmbtu/1000gal)

(3) see application, conservatively assume twice the largest HP (835 HP) expected for potential emissions NOTE 2007 or newer engines, per NSPS subpart IIII Table 1 NOx at 6 9 gr/HP-hr= 2 17 lb/mmbtu

TOTAL NOx:									40 74	lb/hr	23.59	TPY

TABLE CO
C. W Roberts Contracting, Inc
Wildwood, Sumter County, Florida

Attachment A June 2009

Potential Emissions Calculations
Counterflow Drum Mix Asphalt Plant

ASPHALT PLANT ONLY

Carbon Monoxide (CO)															
Emission Point	**Emission Factor**	**Process Rate**										**Potential Emissions**			
Drum Mix Plant	0 13 lb/ton (1)		400	ton/hr		500000	ton/yr					52 0		32 50	
Silo Filling	0 00117998 lb/ton (2)		400	ton/hr		500000	ton/yr					0 5		0 29	
Silo Load Out	0 00134924 lb/ton (2)		400	ton/hr		500000	ton/yr					0 5	lb/hr	0 34	TPY
(1) Emission Factor based on AP-42, Table 11 1-7															
(2) Emission Factor based on AP-42, Table 11 1-14 Assume V = -0 05 and T = 325F															
TOTAL CO.												**53 0**	lb/hr	**33 1**	TPY

RAP CRUSHER AND ASPHALT PLANT

Carbon Monoxide (CO)															
Emission Point	**Emission Factor**	**Process Rate**										**Potential Emissions**			
Drum Mix Plant	0 13 lb/ton (1)		400	ton/hr		300000	ton/yr					52 0		19 50	
Silo Filling	0 00117998 lb/ton (2)		400	ton/hr		500000	ton/yr					0 5		0 29	
Silo Load Out	0 00134924 lb/ton (2)		400	ton/hr		500000	ton/yr					0 5	lb/hr	0 34	TPY
(1) Emission Factor based on AP-42, Table 11 1-7															
(2) Emission Factor based on AP-42, Table 11 1-14 Assume V = -0 05 and T = 325F															
TOTAL CO.												**53.0**	lb/hr	**20 1**	TPY

asphalt plant tonnageuel = 500,000 minus RAP crusher

												Potential Emissions			
	Emission Factor (1)	**Capacity**													
Engine Exhaust (EU 002)	0 95 lb/mmbtu	4 25 mmbtu/hr(3)	0 0310 1000gal/hr	200 tonRAP/hr	0 000155 1000gal/ton	200000 tonRAP/yr	31 02 1000gal/yr	**50.77 1000gal/yr**	6955 49 mmbtu/yr						
								* use higher annual fuel usage from 2002 application of 50 777 TGB							
	0 95 lb/mmbtu	4 25 mmbtu/hr(3)							6955 49 mmbtu/yr			4 04	lb/hr	3 30	TPY
(1) Emission Factor based on AP-42, Table 3 3-1, Diesel Fuel Oil (137 mmbtu/1000gal)															
(3) see application, conservatively assume twice the largest HP (835 HP) expected for potential emissions															
TOTAL CO												**57 05**	lb/hr	**23.44**	TPY

TABLE VOC
C W Roberts Contracting, Inc
Wildwood, Sumter County, Florida

Attachment A June 2009

Potential Emissions Calculations
Counterflow Drum Mix Asphalt Plant

ASPHALT PLANT ONLY

Volatile Organic Compounds (VOC)													
Emission Point	Emission Factor		Process Rate						Potential Emissions			
Drum Mix Plant (EU001)	0 032	lb/ton (1)		400 ton/hr		500000 ton/yr			12 80	lb/hr	8 0	TPY
TOTAL NOx									12 8	lb/hr	8 0	TPY

RAP CRUSHER AND ASPHALT PLANT

Volatile Organic Compounds (VOC)													
Emission Point	Emission Factor		Process Rate						Potential Emissions			
Drum Mix Plant (EU001)	0 032	lb/ton (1)		400 ton/hr		300000 ton/yr			12 80	lb/hr	4 8	TPY
						asphalt plant = 500000 tons minus RAP crusher						

	Emission Factor (2)		Capacity								Potential Emissions			
Engine Exhaust (EU 002)	0 36	lb/mmbtu	4 25 mmbtu/hr(3)	0 0310 1000gal/hr	200 tonRAP/hr	0 000155 1000gal/ton	200000 tonRAP/yr	31 02 1000gal/yr	50 77 1000gal/yr	6955 49 mmbtu/yr				
									* use higher annual fuel usage from 2002 application of 50 77 TGB					
	0 36	lb/mmbtu	4 25 mmbtu/hr(3)							6955 49 mmbtu/yr	1 53	lb/hr	1 25	TPY

(1) Emission Factor based on AP-42, Table 11 1-8
(2) Emission Factor based on AP-42, Table 3 3-1, Diesel Fuel Oil (137 mmbtu/1000gal)
(3) see application, conservatively assume twice the largest HP (835 HP) expected for potential emissions

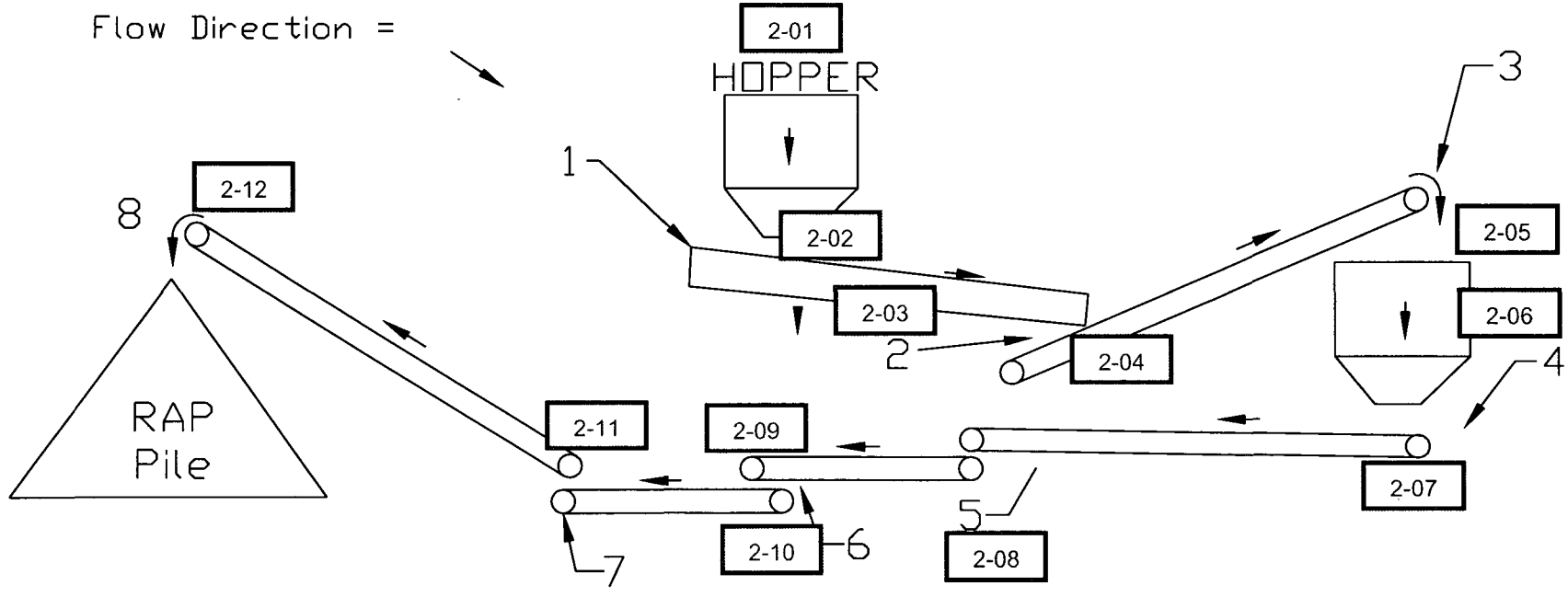
TOTAL NOx											14 33	lb/hr	6 05	TPY

ATTACHMENT B

General Process Diagram for RAP Crusher

Emission Points	Percent of Thruput
1) hopper to screen	100
2) screen to conveyor	90
3) oversize belt conveyor to crusher	90
4) crusher to conveyor	90
5) conveyor to underscreen conveyor	90
6) underscreen belt to short belt conveyor	100
7) short belt conveyor to stacker belt conveyor	100
8) stacker belt conveyor to pile	100

Flow Direction =



C.W. ROBERTS CONTRACTING, INC. RAP CRUSHER PLANT #7 HILLSBOROUGH COUNTY	RAP CRUSHER SYSTEM FLOW DIAGRAM	KUGGLER & ASSOCIATES ENVIRONMENTAL SERVICES 1014 NW THIRTEENTH STREET GAINESVILLE, FLORIDA 32609 352/377-5822 • FAX/377-7158

ATTACHMENT 2

SPECIFIC CONDITION NO. 39, OF OPERATION PERMIT 7775175-002-AO

MONTHLY DATA: JUNE-DECEMBER, 2008

C W Roberts Contracting Inc
Wildwood Asphalt Process Data

date	daily asphalt production tons	monthly asphalt production tons	12-month asphalt production tons	daily asphalt operation hours	monthly asphalt operation hours	12-month asphalt operation hours	daily average tons/hr	incoming fuel loads gallons	monthly asphalt fuel usage tons	12-month asphalt fuel usage tons	daily RAP crush production tons	monthly RAP crush production tons	12-month RAP crush production tons	RAP crush operation hours	monthly RAP crush operation hours	12-month RAP crush operation hours	daily RAP crush fuel usage gallons	monthly RAP crush fuel usage tons	12-month RAP crush fuel usage tons
8/1/2008		27190	97799		125 27	390240			45309	182608	0	10885	10885	0	82	0		707 5	707 5
6/2/2008	1504			6 68			225				0			0					
6/3/2008	1911			8 49			225	4939			0			0					
6/4/2008	1540			6 84			225				0			0					
6/5/2008	1446			6 43			225	5383			0			0					
6/6/2008	6			0 04			150				0			0					
6/7/2008											0			0					
6/8/2008											0			0					
6/9/2008	539			3 37			160	3741			0			0					
6/10/2008	1520			6 76			225				0			0					
6/11/2008	2940			13 07			225	4911			0			0					
6/12/2008	1589			7 06			225				0			0					
6/13/2008	1080			4 8			225	5508			831			8			54		
6/14/2008											0			0					
6/15/2008											0			0					
6/16/2008	937			4 16			225				631			6			41		
6/17/2008	1745			7 76			225	4888			838			8			54 5		
6/18/2008	1888			8 39			225				1177			12			76 5		
6/19/2008	1565			6 96			225	4984			1523			15			99		
6/20/2008	696			4 35			160				500			5			32 5		
6/21/2008											0			0					
6/22/2008											0			0					
6/23/2008	1250			5 56			225	4845			2685			24			174 5		
6/24/2008	2218			9 86			225				1285			13			83 5		
6/25/2008	639			3 98			161	6110			0			0					
6/26/2008	1606			7 14			225				162			2			10 5		
6/27/2008	571			3 57			160				0			0					
6/28/2008											0			0					
6/29/2008											0			0					
6/30/2008											1254			13			81 5		
											0			0					
7/1/2008		21343	119142		97 23	509382			39372	221980	1231	9300	20185	12	93	94	80	604 5	1312
7/2/2008											0			0					
7/3/2008											1692			17			110		
7/4/2008											0			0					
7/5/2008											0			0					
7/6/2008											0			0					
7/7/2008	403			2 52			160	4898			308			3			20		
7/8/2008	836			3 72			225				1477			15			96		
7/9/2008	1476			6 56			225				1723			17			112		
7/10/2008	1399			6 22			225	5951			0			0					
7/11/2008	45			0 28			161				1162			12			75 5		
7/12/2008											0			0					
7/13/2008											0			0					
7/14/2008	913			4 06			225				862			9			56		
7/15/2008	1570			6 98			225	5986			0			0					
7/16/2008	887			3 94			225				0			0					
7/17/2008	279			1 74			160				0			0					
7/18/2008	291			1 82			160				0			0					
7/19/2008											0			0					
7/20/2008											0			0					
7/21/2008	9			0 05			180	5633			0			0					
7/22/2008	285			1 78			160				0			0					
7/23/2008	1933			8 59			225				846			8			55		
7/24/2008	1608			7 15			225				0			0					
7/25/2008	1175			5 22			225	4944			0			0					
7/26/2008											0			0					
7/27/2008											0			0					
7/28/2008	1935			8 6			225				0			0					
7/29/2008	2067			9 19			225	5990			0			0					
7/30/2008	2597			11 54			225	5970			0			0					
7/31/2008	1635			7 27			225				0			0					
											0			0					
8/1/2008	98	21822	140764	0 61	99 16	650146	161	5991	42489	264489	0	0	20185	0	0	175		0	1312
8/2/2008											0			0					
8/3/2008											0			0					
8/4/2008	1744			7 75			225				0			0					
8/5/2008	2225			9 89			225	6187			0			0					
8/6/2008	2338			10 38			225				0			0					
8/7/2008	1772			7 88			225	5959			0			0					
8/8/2008	386			2 41			160				0			0					
8/9/2008											0			0					
8/10/2008											0			0					
8/11/2008	2614			11 62			225	5966			0			0					
8/12/2008	2039			9 06			225				0			0					
8/13/2008	547			3 42			160	5396			0			0					
8/14/2008	6			0 04			150				0			0					
8/15/2008											0			0					
8/16/2008											0			0					
8/17/2008											0			0					
8/18/2008	626			3 91			160				0			0					
8/19/2008											0			0					
8/20/2008											0			0					
8/21/2008											0			0					
8/22/2008											0			0					
8/23/2008											0			0					
8/24/2008											0			0					
8/25/2008	1787			7 07			250				0			0					
8/26/2008	1850			8 22			225	5999			0			0					
8/27/2008	1342			5 96			225				0			0					
8/28/2008	1800			8			225	6991			0			0					
8/29/2008	470			2 94			160				0			0					
8/30/2008											0			0					
8/31/2008											0			0					
											0			0					
9/1/2008	0	20874	152252		100 99	716 15			39755	283713	0	0	20185	0	0	175	0	0	1312
9/2/2008	1182			5 25			225	4987			0			0			0		
9/3/2008	1248			5 55			225				0			0			0		
9/4/2008	582			3 64			160				0			0			0		
9/5/2008	135			0 84			161	5971			0			0			0		
9/6/2008	0			0							0			0			0		
9/7/2008	0			0							0			0			0		
9/8/2008	1035			4 6			225				0			0			0		
9/9/2008	1912			8 5			225				0			0			0		
9/10/2008	1773			7 88			225	5982			0			0			0		
9/11/2008	971			4 32			225				0			0			0		
9/12/2008	786			4 91			160				0			0			0		
9/13/2008	0			0							0			0			0		
9/14/2008	0			0							0			0			0		
9/15/2008	505			3 16			160	5995			0			0			0		
9/16/2008	1123			4 99			225				0			0			0		
9/17/2008	696			4 35			160				0			0			0		
9/18/2008	843			3 75			225				0			0			0		
9/19/2008	499			3 12			160	4991			0			0			0		
9/20/2008	0			0							0			0			0		
9/21/2008	0			0							0			0			0		
9/22/2008	722			4 51			160				0			0			0		
9/23/2008	1497			6 65			225				0			0			0		
9/24/2008	1283			5 7			225	5931			0			0			0		
9/25/2008	1718			7 64			225				0			0			0		
9/26/2008	84			0 53			158				0			0			0		
9/27/2008	0			0							0			0			0		
9/28/2008	0			0							0			0			0		
9/29/2008	538			3 36			160	5898			0			0			0		
9/30/2008	1742			7 74			225				0			0			0		
																	0		