Florida Department of
Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

July 15, 2009

Electronically Sent - Received Receipt Requested

Mr. Vince L. Hafeli, Vice President - Plants and Materials
Ajax Paving Industries of Florida, LLC
510 Gene Green Road
Nokomis, Florida 34275

Re: Project No. 7775592-001-AC
Two Portable Lime Silos and Fiber Feeder Systems
Relocatable Project

Dear Mr. Hafeli:

On May 22, 2009, an application was submitted requesting authorization for two relocatable portable lime silos and/or two relocatable portable mineral wool asphalt reinforcement fiber feeder systems for use at any of your company's six existing hot mix asphalt plants. Enclosed are the following documents: Technical Evaluation and Preliminary Determination; Draft Permit and Appendices; Written Notice of Intent to Issue Air Permit; and Public Notice of Intent to Issue Air Permit.

The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact the Project Engineer, Bruce Mitchell, at 850/413-9198.

Sincerely,

For Trina Vielhauer, Chief
Bureau of Air Regulation

Enclosures

TLV/jfk/bm

In the Matter of an
Application for Air Permit by:

Ajax Paving Industries of Florida, LLC
510 Gene Green Road
Nokomis, Florida 32475

Authorized Representative:
Mr. Vince L. Hafeli
Vice President – Plants and Materials

Project No. 7775592-001-AC
Two Portable Lime Silos and Fiber Feeder Systems
Relocatable Project
Counties: Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota

Facility Location: Ajax Paving Industries of Florida, LLC (Ajax), owns and operates six existing hot mix asphalt (HMA) plants. The potential locations of the relocatable portable lime silos and/or relocatable portable mineral wool asphalt reinforcement fiber (fiber) feeder systems are:

1. Nokomis HMA Plant, 510 Gene Green Road, Laurel, Sarasota County;
2. Tuckers Corner HMA Plant, 40851 Cook Brown Road, Punta Gorda, Charlotte County;
3. Port Manatee HMA Plant, 12165 U.S. 41 North, Palmetto, Manatee County;
4. Pennsylvania Street HMA Plant, 7121 Pennsylvania Street, Fort Myers, Lee County (Relocatable Plant);
5. Odessa HMA Plant, 11603 County Road 54 West, Odessa, Pasco County (Relocatable Plant); and
6. Tampa HMA Plant, 5960 Jensen Road, Tampa, Hillsborough County.

However, a relocatable portable lime silo and/or a relocatable portable fiber feeder system may also be operated at any other site within the permitted counties (Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota).

Project: Ajax is requesting authorization to be able to set up two relocatable portable lime silos and/or two relocatable portable mineral wool asphalt reinforcement fiber (fiber) feeder systems for use at any of six existing HMA plants. The usage of this material will not increase the permitted production rate nor the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. The air operation permit at each HMA plant must be revised to allow operation of this equipment prior to relocation and operation at that site. The air permit does not relieve the owner from complying with other local provisions such as zoning.

The project is subject to general preconstruction review pursuant to Rule 62-212.300, Florida Administrative Code (F.A.C.). Potential emissions are less than one ton per year of particulate matter (PM) after control. The control systems that are going to be utilized to minimize PM and visible emissions are 1) a dust collector located atop of a lime silo, when loading lime into the lime silo from a truck or unloading lime from the lime silo into a truck, and 2) the existing HMA plant's main baghouse dust collector, when feeding fiber material and lime to the HMA mixing drum operation. Negative pressure will be maintained on both operations to further minimize PM and visible emissions. Additional details are provided in the attached Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary

Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

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

Public Notice: Pursuant to Section 403.815, F.S., and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rules 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

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

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

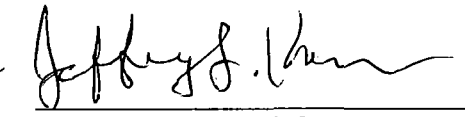
A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by

the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

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

Mediation: Mediation is not available in this proceeding.

Executed in Tallahassee, Florida.

FOR 

Trina Vielhauer, Chief
Bureau of Air Regulation

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Public Notice, the Technical Evaluation and Preliminary Determination, and the Draft Permit), was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on 7/16/09 to the persons listed below.

Mr. Vince L. Hafeli, V.P., Ajax Paving Industries of Florida, LLC (vhafeli@ajaxpaving.com)
Mr. Lynn Robinson, P.E., Southern Environmental Sciences, Inc. (lrobinson@sesfla.com)
Mr. Jerry Campbell, Environmental Protection Commissions of Hillsborough County (campbell@epchc.org)
Ms. Susan Cameron, Sarasota County (scameron@scgov.net)
Ms. Mara Nasca, Southwest District (Mara.Nasca@dep.state.fl.us)
Mr. Ajay Satyal, South District (Ajay.Satyal@dep.state.fl.us)
Ms. Vickie Gibson, DEP-BAR Reading File (victoria.gibson@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), F.S., with the designated agency clerk, receipt of which is hereby acknowledged.

(Clerk) 7/16/09 (Date)

Memorandum

Florida Department of
Environmental Protection

TO: Trina Vielhauer, Bureau of Air Regulation

THRU: Jeff Koerner, New Source Review Section

FROM: Bruce Mitchell, New Source Review Section

DATE: July 8, 2009

SUBJECT: Ajax Paving Industries of Florida, LLC
Potential Sites in Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota Counties
Draft Air Construction Permit
7775592-001-AC
Portable Lime Silos (2) and Fiber Feeder Systems (2)

Attached for your review is a draft minor air construction permit package for Ajax Paving Industries of Florida, LLC (Ajax) for authorization to construct (assemble, dismantle and reassemble) a portable fiber feeder system and/or a portable lime silo to be located and relocated at one of six existing hot mix asphalt (HMA) plants at locations in Florida. The usage of this material will not increase the permitted production rate nor the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. The air operation permit at each HMA plant must be revised to allow operation of this equipment prior to relocation and operation at that site. The air permit does not relieve the owner from complying with other local provisions such as zoning. The attached Technical Evaluation and Preliminary Determination provides a detailed description of the project and the rationale for permit issuance. Day 90 of the permitting time clock is August 20, 2009. I recommend your approval of the attached draft permit package.

Attachments

TLV/jfk/bm

P.E. CERTIFICATION STATEMENT

PERMITTEE

Ajax Paving Industries of Florida, LLC
510 Gene Green Road
Nokomis, Florida 34275

Draft Air Permit No. 7775592-001-AC
Lime Silos and Fiber Feeders
Counties: Sarasota, Charlotte,
Manatee, Lee, Pasco, and Hillsborough

PROJECT DESCRIPTION

Ajax Paving Industries of Florida, LLC (Ajax) owns and operates six existing hot mix asphalt (HMA) plants in the following counties: Sarasota, Charlotte, Manatee, Lee, Pasco, and Hillsborough. Ajax is requesting authorization to be able to set up two relocatable portable lime silos and/or two relocatable portable mineral wool asphalt reinforcement fiber (fiber) feeder systems for use at any of the six existing hot mix asphalt (HMA) plants in any combination of equipment. The usage of this material will not increase the permitted production rate or the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. The air operation permit at each HMA plant must be revised to allow operation of this equipment prior to relocation and operation at that site. The air permit does not relieve the owner from complying with other local provisions such as zoning.

Potential emissions are less than one ton per year of particulate matter (PM) after control from all units combined. The control systems include: a dust collector located on top of each lime silo to control dust emissions when loading lime into the lime silo from a truck or unloading lime from the lime silo into a truck, and the existing HMA plant's main baghouse dust collector, when feeding fiber material and/or lime to the HMA mixing drum operation. Negative pressure will be maintained on both operations to further minimize PM and visible emissions. The project is subject to general preconstruction review pursuant to Rule 62-212.300, Florida Administrative Code (F.A.C.).

I HEREBY CERTIFY *that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).*

Jeffery F. Koerner, P.E.
Registration Number: 49441

7-15-09
(Date)

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

Florida Department of Environmental Protection
Division of Air Resource Management, Bureau of Air Regulation
Project No. 7775592-001-AC
Ajax Paving Industries of Florida, LLC
Two Relocatable Lime Silos and Fiber Feeder Systems
Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota Counties, Florida

Applicant: The applicant for this project is the Ajax Paving Industries of Florida, LLC. The applicant's authorized representative and mailing address is: Mr. Vince L. Hafeli, Vice President, Ajax Paving Industries of Florida, LLC, 510 Gene Green Road, Nokomis, Florida 34275.

Facility Locations: Ajax Paving Industries of Florida, LLC (Ajax) owns and operates six existing hot mix asphalt (HMA) plants. Ajax is requesting authorization to be able to set up two relocatable portable lime silos and/or two relocatable portable mineral wool asphalt reinforcement fiber (fiber) feeder systems for use at any of the six existing HMA plants. The potential locations of a relocatable portable lime silo and/or a relocatable portable fiber feeder system are:

1. Nokomis HMA Plant, 510 Gene Green Road, Laurel, Sarasota County;
2. Tuckers Corner HMA Plant, 40851 Cook Brown Road, Punta Gorda, Charlotte County;
3. Port Manatee HMA Plant, 12165 U.S. 41 North, Palmetto, Manatee County;
4. Pennsylvania Street HMA Plant, 7121 Pennsylvania Street, Fort Myers, Lee County (Relocatable Plant);
5. Odessa HMA Plant, 11603 County Road 54 West, Odessa, Pasco County (Relocatable Plant); and
6. Tampa HMA Plant, 5960 Jensen Road, Tampa, Hillsborough County.

However, a relocatable portable lime silo and/or a relocatable portable fiber feeder system may also be operated at any other site within the permitted counties (Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota).

Project: Ajax requests authorization to be able to set up two relocatable portable lime silos and/or two relocatable portable fiber feeder systems for use at any of six existing HMA plants. The usage of this material will not increase the permitted production rate nor the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. The air operation permit at each HMA plant must be revised to allow operation of this equipment prior to relocation and operation at that site. The air permit does not relieve the owner from complying with other local provisions such as zoning.

The project is subject to general preconstruction review pursuant to Rule 62-212.300, Florida Administrative Code (F.A.C.). Potential emissions are less than one ton per year of particulate matter (PM) after control. The control systems that are going to be utilized to minimize PM and visible emissions are 1) a dust collector located atop of a lime silo, when loading lime into the lime silo from a truck or unloading lime from the lime silo into a truck, and 2) the existing HMA plant's main baghouse dust collector, when feeding fiber material and lime to the HMA mixing drum operation. Negative pressure will be maintained on both operations to further minimize PM and visible emissions.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-212, F.A.C. The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Bureau of Air Regulation is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical address is: 111 South Magnolia Drive, Suite #4, Tallahassee, Florida 32301. The Permitting Authority's mailing address is: 2600 Blair Stone Road, MS #5505, Tallahassee, Florida 32399-2400. The Permitting Authority's telephone number is 850/488-0114.

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

project review engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site:

www.dep.state.fl.us/air/eproducts/apds/default.asp.

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

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

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

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

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final

decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available for this proceeding.

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

PROJECT

Project No. 7775592-001-AC
Application for Minor Source Air Construction Permit
Two Portable Lime Silos and Fiber Feeders, Relocatable Operation

AFFECTED COUNTIES

Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota Counties

APPLICANT

Ajax Paving Industries of Florida, LLC
510 Gene Green Road
Nokomis, Florida 34275

AFFECTED FACILITIES

Pennsylvania Street/Lee County Hot Mix Asphalt (HMA) Plant
Nokomis/Sarasota County HMA Plant
Odessa/Pasco County HMA Plant
Palmetto/Manatee County HMA Plant
Tampa/Hillsborough County HMA Plant
Tuckers Corners/Charlotte County HMA Plant

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Division of Air Resource Management
Bureau of Air Regulation
New Source Review Section
2600 Blair Stone Road, MS #5505
Tallahassee, Florida 32399-2400

July 15, 2009

1. GENERAL PROJECT INFORMATION

AIR POLLUTION REGULATIONS

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

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

Glossary of Common Terms

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

Existing Facility Description and Locations

The applicant, Ajax Paving Industries of Florida, LLC (Ajax), owns and operates six existing hot mix asphalt (HMA) plants, which are categorized under Standard Industrial Classification Code No. 2951, Asphalt Paving Mixtures and Blocks. Ajax requests an air construction permit authorization for the installation of the following portable equipment: two lime silos with dust collectors; and two mineral wool asphalt reinforcement fiber feeder systems. The existing Ajax relocatable and stationary HMA facilities affected by this permitting action are identified in the following table, including their addresses, county locations and Universal Transverse Mercator coordinates (UTM).

Plant 1: Nokomis/Sarasota County 510 Gene Green Road Laurel, FL 34272 Facility ID: 1150103 UTM: Zone 17; 355.83 East; 3002.58 North	Plant 2: Tuckers Corner/Charlotte County 40851 Cook Brown Road Punta Gorda, FL 33950 Facility ID: 0150028 UTM: Zone 17; 422.70 East; 2963.90 North
Plant 3: Port Manatee/Manatee County 12165 U.S. 41 North Palmetto, FL 34221 Facility ID: 0810063 UTM: Zone 17; 347.83 East; 3056.59 North	Plant 4: Pennsylvania Street/Lee County 7121 Pennsylvania Street Fort Myers, FL 33912 Facility ID: 7774822 (Relocatable) UTM: Zone 17; 418.41 East; 2930.94 North
Plant 5: Odessa/Pasco County 11603 County Road 54 West Odessa, FL 33556 Facility ID: 1010027 UTM: Zone 17; 342.24 East; 3119.22 North	Plant 6: Tampa/Hillsborough County 5960 Jensen Road Tampa, FL 33619 Facility ID: 7775424 (Relocatable) UTM: Zone 17; 362.86 East; 3085.66 North

Except for the Hillsborough County site, all of the other sites are in an area that is in attainment (or designated as unclassifiable) for all pollutants subject to state or federal Ambient Air Quality Standards (AAQS).

Hillsborough County is in an area that is designated as air quality maintenance for the pollutants ozone and particulate matter and in attainment (or designated as unclassifiable) for all other pollutants subject to state or federal AAQS.

Facility Regulatory Categories

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

Project Description

On May 22, 2009, the Ajax submitted an application for two relocatable lime silos and two relocatable fiber feeder systems. In the production of certain HMA concrete products, lime (mineral filler) is added to create better bonding between asphalt cement and aggregate, which can increase the life of the resulting asphalt concrete. Also, fibers are used in some HMA concrete products, for example open-graded friction courses, to help reinforce the asphalt concrete. Ajax submitted a request for a statewide air construction permit for two identical portable lime silos and two identical fiber feeder systems for authorization to set-up any one portable lime silo and/or any one portable fiber feeder system at any of the six existing HMA plants listed above. The following describes each relocatable emissions unit or activity and operations.

Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)

The two proposed relocatable fiber feeder systems are identical emissions units. Each fiber feeder system is a portable, skid-mounted, gravimetric feeding system for feeding fibers, in an enclosed manner, into a HMA mixing drum. The fiber is purchased in plastic-wrapped bales and weigh between 700 to 900 pounds (lb). The fiber feed rate from each fiber feeder system will be approximately 0.4% of the HMA tons/hr. The estimated total annual processing rate for each fiber feeder is 2,571 bales per year, based on 700 lb/bale.

In the set-up at a HMA plant site, the fiber feeder system is initially connected to a point inside the HMA mixing drum through piping and hoses. Bales of fibers, usually weighing between 700 to 900 lb each, are stripped of the plastic-wrapping and placed into the loading bin on the fiber feeder system using a forklift. The loading bin is hydraulically raised to load the bale into the main feed hopper (hopper). Once the fiber bale is loaded into the hopper, slowly-rotating augers in the bottom of the hopper, beneath the fiber material, loosen the fibers and feed them in a fully enclosed manner into a gravimetric metering system. The fibers travel, in an enclosed manner, through the weigh scale, then through a small (~ 3 inches in diameter) enclosed auger to a blower, which causes the fiber to be fed pneumatically through hose and piping to a point inside the HMA mixing drum. Except for the bale-loading step into the main feed hopper, PM and visible emissions from the fiber feeder systems are controlled by the HMA plant's fabric filter (FF) system (main baghouse). When the fiber feeder system is to be relocated, the piping and hoses to the HMA mixing drum are disconnected and secured on the trailer, moved to a new location and reassembled.

The fiber is manufactured by Sloss Industries Corporation under the name of Fiberand road fiber. Other names for this material are tile wool, slag wool fiber, mineral wool fiber, mineral fiber, man-made vitreous fiber and man-made mineral fiber. These fibers are produced by melting raw materials (like igneous/volcanic rock – in this case, basalt) and centrifuging and drawing or blowing the molten matter into the desired fibrous form. Because the fibers are cooled after formation, the fibers remain non-crystalline (vitreous). After formation, the materials are sprayed with lubricating oils and binders to reduce fiber breakage and eliminate dust.

From exposure by contact, slag wool fiber can cause transitory mechanical irritation of the eyes, skin or upper respiratory tract. Simple washing with warm water and soap will remove the material from the skin. Flushing will help soothe the eyes as well as remove the fibers. Over time, phlegm from the lungs will help to remove the fibers from the upper respiratory tract. Preventive measures, such as having good ventilation and/or wearing an approved respirator and the wearing of long sleeve shirts, gloves and safety glasses, will minimize exposure and potential problems from contact with the fibers.

Lime Silos

The two proposed lime silos are identical emissions units. Each lime silo is a portable trailer-mounted system with a self-contained weighing and flow controlled system for feeding lime, in an enclosed manner, into a HMA process. Each silo has a capacity of 34 tons and will have a feed rate of approximately 1% of the HMA tons/hr. The projected annual throughput of each silo is 2,500 tons per year of lime. Each lime silo has an associated Belgrade Steel Tank Company pulse-jet baghouse dust collector, Model No. Belle 225, or equivalent, located atop the silo for controlling PM and visible emissions.

In the set-up at a HMA plant site, the silo is secured in a vertical position and lime is pneumatically loaded into the silo from a bulk lime tanker truck. During the loading process, air displaced from the silo passes through the silo dust collector to control PM and visible emissions. Each existing HMA plant is equipped with a main baghouse, which controls PM and visible emissions from the HMA plant dryer and associated processes. Lime from the lime silo is fed, in an enclosed manner, into an enclosed auger that carries fine particles from the HMA plant main baghouse to the HMA plant mixing drum. When the lime silo is to be relocated, the silo is emptied and secured in a horizontal position on the trailer, moved to a new location and reassembled.

The permittee requests authorization to set-up any one lime silo and/or any one fiber feeder system for use at any of the six existing Ajax HMA plants. After obtaining this air construction permit, the permittee must then apply to each district or Local Program to revise the air operation permit of the existing HMA plant to incorporate the requirements for the relocatable lime silos and fiber feeder systems.

2. PSD APPLICABILITY

General PSD Applicability

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

- 5 tons per year or more of lead;
- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of 28 identified PSD-major facility categories.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NOx); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; and mercury (Hg). In addition, significant emissions rate also means

any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 micron per cubic meter ($\mu g/m^3$), 24-hour average.

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

PSD Applicability for the Project

The following table summarizes the potential-to-emit (PTE) emissions in pounds per year (lb/hr) and tons per year (TPY) from the project.

Emissions Unit or Activity	Pollutant	PTE (lb/hr)	PTE (TPY)	Basis
Fiber Feeder System, each	PM/PM_{10}	negligible [1]	negligible [1]	Field Observation [1]
Lime Silo, each	PM/PM_{10}	0.025 [2]	0.0025	AP-42, Table 11.12-2.
Total (silo and feeder)	PM/PM_{10}	0.025	0.0025	---

[1] Based on field observations by the Compliance Authority of the Northeast District Office for APAC-Southeast, Inc., Plant 4, an existing HMA plant in St. Johns County. Operations are enclosed and under negative pressure from the main HMA plant baghouse control system.

[2] Total PM emission factor is based on the reference document AP-42, Table 11.12-2., for cement unloading to elevated storage silo (pneumatic) at 0.00099 lbs/ton of material loaded; each truck load is 20 tons; annual loading is 125 trucks per lime silo. Each lime silo has an associated dust collector control system.

The six existing HMA sites are not Title V facilities and are not PSD major stationary sources. The estimated potential PM emissions are much less than 1 ton per year. This level of emissions increase will not make any HMA plant a Title V or PSD major source of air pollution.

3. RULE APPLICABILITY

State and Local Regulations

This project is subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The Florida Statutes authorize the Department of Environmental Protection to establish rules and regulations regarding air quality as part of the Florida Administrative Code (F.A.C.). This project is subject to the applicable rules and regulations defined in the following Chapters of the F.A.C.: 62-4 (Permitting Requirements); 62-204 (Ambient Air Quality Requirements, PSD Increments, and Federal Regulations Adopted by Reference); 62-210 (Permits Required, Public Notice, Reports, Stack Height Policy, Circumvention, Excess Emissions and Forms); 62-212 (Preconstruction Review); 62-296 (Emission Limiting Standards); and 62-297 (Test Methods and Procedures, Continuous Monitoring Specifications and Alternate Sampling Procedures).

The PM maintenance area is also regulated by the local regulations of the Environmental Protection Commission of Hillsborough County (EPCHC). The lime silo operations will be subject to the applicable requirements of Rules 1-3.24, 1-3.50, 1-3.52.2 and 1-3.60, Rules of the EPCHC. The fiber feeder system operations will be subject to the applicable requirements of Rule 1-3.24, Rules of the EPCHC.

Federal Regulations

This lime silos and fiber feeder systems are not subject to any New Source Performance Standards (NSPS) in 40 CFR 60 or National Emission Standards for HAP in 40 CFR 61 and 63.

4. PROJECT REVIEW

Design Specifications and Operation Requested by the Applicant

The applicant requests authorization to set-up a fiber feeder system and/or a lime silo at various Ajax HMA plant sites based on the following equipment specifications and restrictions:

Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system):

- Each fiber feeder system will be used to provide fibers through an enclosed process to a HMA drum mixer.
- Each fiber feeder system will process approximately 0.4% of the HMA processing rate. The estimated annual processing rate is 900 tons of fiber material in any consecutive 12 months from each fiber feed system.
- Each fiber feeder system will utilize the existing HMA main baghouse system to control PM and visible emissions and to maintain negative pressure on the fiber feeder system. No PM or visible emissions standard will be assigned to this side operation because it will be connected to the hot drum mixer operation and maintained under negative pressure by the main baghouse control system of the asphalt plant, which has its own PM and visible emissions standards.
- The usage of this material will not increase the permitted production rate or the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product.

Lime Silos:

- Each lime silo will provide purchased lime for use in a HMA product.
- Each lime silo will process approximately 1% of the HMA processing rate. The estimated annual processing rate is 2,500 tons of lime in any consecutive 12 months from each lime silo. Each lime silo has a capacity of 34 tons of lime.
- Each lime silo will have an associated dust collector to control PM and visible emissions.
- Each silo dust collector will be a Belgrade Steel Tank Company pulse-jet dust collector, Model No. Belle 225, or equivalent. It will be designed to achieve an outlet dust loading of 0.01 grains/scf of exhaust. For maintenance, collector bags will only be replaced with bags that meet this design specification.
- When in Hillsborough County, the visible emissions will be limited to no visible emissions (5% opacity) pursuant to EPCHC Rule 1-3.52. When outside Hillsborough County, the visible emissions standard will be limited to 5% opacity pursuant to Rule 62-297.620(4), F.A.C.
- The usage of this material will not increase the permitted production rate or the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product.

The draft permit will include the above specifications and limitations as permit conditions, which affect emissions from the fiber feeder systems and the lime silos.

Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards

This rule has three parts: a general particulate matter emissions standard based on the "Process Weight Table", a general visible emissions standard of 20% opacity, and the requirement to take reasonable precautions to prevent unconfined emissions of particulate matter.

- For each lime silo, the emissions standard based on the Process Weight Table is not applicable because the lime silo does not, "... produce a finished product through a chemical or physical change ..."

- For each fiber feeder system, the emissions standard based on the Process Weight Table is not applicable because the fiber fragments created by the rotating augers on the bale are not a final product, but an interim material that is mixed with other materials in the HMA drum mixer to form a final HMA product. The HMA plant is classified as an asphalt plant subject to its own specific PM and visible emissions limiting standards and requirements.
- The following regulation is generally applicable to all activities, "No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20% opacity." Since the lime silos have a more stringent visible emissions standard, this regulation does not apply to the lime silos. Since the HMA plant's main baghouse control system has its own visible emissions limit and controls the fiber feeder exhaust, this regulation does not apply to the fiber feeder systems.
- To control potential fugitive emissions from the operation of a fiber feeder system, the applicant shall connect the system to the HMA drum mixer and maintain negative pressure on the system prior to and during operation.
- For each lime silo, the applicant shall control PM and visible emissions with a baghouse control system.
- Unconfined Emissions of Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including 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 shall include: use of hoods, fans, filters, and similar equipment to contain, capture, control and/or vent particulate matter; and, total enclosure, partial enclosure or covering of conveyor systems and/or operations. Each air operation permit for the existing HMA plants already includes reasonable precautions to prevent fugitive emissions.

The draft permit will include the applicable requirements.

Rule 62-296.711, F.A.C., RACT for Materials Handling, Sizing, Screening, Crushing and Grinding Operations

Hillsborough County contains an area that is designated as an air quality maintenance area for PM, which is described in Rule 62-204.340, F.A.C., as, "That portion of Hillsborough County which falls within the area of the circle having a center point at the intersection of U. S. 41 South and State Road 60 and a radius of 12 kilometers." For any HMA plant that could operate within this area, each lime silo has an allowable emission limit of less than 1 TPY and is not subject to the RACT standards for Materials Handling, Sizing, Screening, Crushing and Grinding Operations in accordance with Rule 62-296.700(2)(c), F.A.C. The fiber feeder operations are also not subject to this regulation because the operations are enclosed and maintained under negative pressure by the asphalt plant's main baghouse control system, which has its own PM and visible emissions standards.

Rules of the Environmental Protection Commission of Hillsborough County

The Environmental Protection Commission of Hillsborough County (EPCHC) is an approved local air pollution control program. EPCHC has established local air pollution control regulations. Stationary sources of air pollution are regulated by the applicable requirements in Chapter 1-3 of the Rules of EPCHC. The portable lime silos are subject to the following applicable requirements when operating in Hillsborough County. The fiber feeder systems are subject to Rule 1-3.24, Rules of EPCHC, when operating in Hillsborough County.

Rule 1-3.24 (Public Notification), EPCHC: This rule includes additional public notification requirements, which must be coordinated with the EPCHC.

Rule 1-3.50 (Emission Limiting and Performance Standards), EPCHC: "Provisions contained in Chapters 62-204 and 62-296, F.A.C., pertinent to Hillsborough County, are adopted and hereby incorporated by reference, except for Sections 62-296.320(4)(b)2 and 62-296.513(1)(c), F.A.C., and except as may be modified herein."

Rule 1-3.52.2 (Visible Emissions), EPCHC: This rule establishes: a general visible emissions standard of 20% opacity and a more stringent visible emission standard of 5% for loading or unloading of materials (except when material is being discharged to the hold of a ship from a conveyor system during which an opacity of 10% is allowed when the conveyor and/or hatch covering is moved). The 10% opacity does not apply since there is no ship hold involved in this project.

Rule 1-3.60 (Source Sampling and Monitoring), EPCHC. Source sampling and monitoring shall be performed in compliance with Department and EPA requirements so as to determine as accurately as possible actual operational emissions.

Compliance Demonstrations

The draft permit will include the following requirements to ensure compliance with the permit conditions.

- The permittee shall keep an operation and maintenance (O&M) plan for the baghouse control systems (each HMA plant's main baghouse system controlling the fiber feeder system's operation and each lime silo baghouse system controlling the lime silo operation). The O&M plan shall include: the collector bag specifications, the typical range of pressure drop across the baghouse and a plan for regular maintenance.
- Each fiber feeder system and lime silo shall be maintained under negative pressure and exhausted through an integral baghouse control system when operating.
- For each lime silo, the loading of lime from a truck is a batch operation. An initial and subsequent annual compliance test using EPA Method 9 shall be conducted on the silo's baghouse system to determine compliance with the visible emissions standards. The compliance test shall be equal to the duration of the batch cycle or operation completion time pursuant to Rule 62-297.310(4)(a)2.a., F.A.C. The annual visible emissions test shall be conducted every fiscal year at only one HMA plant. The test report shall be sent to the Compliance Authority, whose jurisdiction includes the HMA plant being tested, with a copy to the other Compliance Authorities where these emissions units or activities are authorized to operate.
- For good cause, a Compliance Authority may request a compliance test if there is reason to believe that a unit is not in compliance with a standard pursuant to Rule 62-297.310(7)(b), F.A.C..
- The permittee shall maintain the following operational records: tons of fiber and lime processed per month per HMA plant.

Operation at Various Sites

The permittee must submit an application for and receive a revised minor source air operation permit to operate a portable fiber feeder system and/or lime silo at existing HMA plant sites throughout the permitted counties.

Relocations within Permitted Counties

Since some HMA plants may relocate throughout the State, the public notice will recognize that the portable lime silos and fiber feeder systems may be relocated to any HMA plant within the given county that holds an air operation permit for such activity. Therefore, the draft permit authorizes operation of a portable fiber feeder system and/or lime silo at existing HMA plant sites anywhere within the permitted counties (Charlotte, Hillsborough, Lee, Manatee, Pasco and Sarasota). With a 1-day advance notification, the draft permit authorizes relocation of the portable unit to any site within the permitted counties for a HMA plant holding an air operation permit for this activity. For each relocation, the permittee must submit a "Facility Relocation Notification Form" within at least five days of relocating. The air permit does not relieve the owner from complying with other local provisions such as zoning.

Adding New Permitted Counties

To add a new county to the approved list (Appendix PC), the draft permit requires the following process.

- Permittee submits a request to modify the existing air construction permit and revise the existing air operation permit accordingly.
- With a complete application, the Bureau of Air Regulation issues a draft air construction permit with a Public Notice that specifically states that the fiber feeder system and the lime silo are both portable and may be relocated to any site within the county. The applicant and any parties copied on the draft permit package have 14 days upon receipt to request an administrative hearing on the draft air construction permit.
- The applicant publishes the Public Notice in a newspaper of general circulation within the county and provides the proof of publication to the Bureau of Air Regulation. The Bureau of Air Regulation accepts comments and requests for administrative hearings on the draft air construction permit for a period of 14 days from publication of the Public Notice.
- If there are petitions for administrative hearings or requests for extensions of time in which to file for petitions for administrative hearings, then the project is in litigation and no action may be taken until the litigation is resolved. A portable fiber feeder system and/or a lime silo may not be relocated to the new county until the litigation is resolved and final permits are issued.
- If there are no petitions for administrative hearings or requests for extensions of time in which to file for petitions for administrative hearings, the Bureau of Air Regulation issues a final permit modification for the existing air construction permit to identify the new county (Appendix PC). The permittee must then submit an application to revise the air operation permit accordingly for each HMA plant that would operate in the new county. If the original request included the "Facility Relocation Notification Form", a portable fiber feeder system and/or a lime silo may be moved to the desired location once the final permits are issued with proper notification.

CONCLUSION

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. In addition to the plant sites at which these emissions units or activities will be used, the applicant will be authorized to relocate the emissions units or activities to any site within the affected counties. Bruce Mitchell is the project engineer and Jeff Koerner approved the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Department's Bureau of Air Regulation at Mail Station #5505, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

DRAFT PERMIT

PERMITTEE

Ajax Paving Industries of Florida, LLC
510 Gene Green Road
Nokomis, Florida 34275

Authorized Representative:
Mr. Vince L. Hafeli
V.P. – Plants and Materials

Permit No. 7775592-001-AC
Two Portable Lime Silos and Fiber Feeders
Facility ID No. 7775592
Expires: July 31, 2011

PROJECT

This permit authorizes the construction (assemble, dismantle and reassemble) of a portable fiber feeder system and/or a portable lime silo at six existing hot mix asphalt (HMA) plants at locations in Florida. Once the air operation permit of a HMA plant is revised to incorporate the requirements of this air construction permit, a portable fiber feeder system and/or a portable lime silo may be relocated to any site within a previously permitted county identified in Appendix PC, which includes submitting a Facility Notification Relocation Form to the appropriate District Office and/or Local Air Program. Each portable fiber feeder system and/or portable lime silo are categorized as a synthetic, non-Title V, minor source of air pollution.

STATEMENT OF BASIS

This air pollution construction permit is issued under the provisions of Chapter 403 of the Florida Statutes (F.S.), and the Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-296, and 62-297. The permittee is authorized to construct the facility in accordance with the conditions of this permit and as described in the application, approved drawings, plans, and other documents on file with the Department of Environmental Protection (Department).

CONTENTS

(DRAFT)

Joseph Kahn, Director
Division of Air Resource Management

(Date)

FACILITY DESCRIPTION

Ajax Paving Industries of Florida, LLC (Ajax), owns and operates six existing hot mix asphalt (HMA) plants, which are categorized under Standard Industrial Classification Code No. 2951, Asphalt Paving Mixtures and Blocks. The existing Ajax relocatable or stationary HMA facilities affected by this permitting action are identified below. Ajax is authorized to set-up a relocatable lime silo and/or a relocatable mineral wool asphalt reinforcement fiber (fiber) feeder system for use at any of the six existing HMA plants. However, each HMA plant shall have its operation permit amended to incorporate the use of a relocatable lime silo and/or a relocatable fiber feeder system prior to being operated at that facility. Each HMA plant has a main baghouse control system that will be used to control the particulate matter and visible emissions from the operation of the fiber feeder system and the use of lime from the lime silo. The portable units will be based out of the Nokomis/Sarasota County HMA plant location.

The potential locations are:

1. Nokomis HMA Plant, 510 Gene Green Road, Laurel, Sarasota County; Facility ID No. 1150103;
2. Tuckers Corner HMA Plant, 40851 Cook Brown Road, Punta Gorda, Charlotte County; Facility ID No. 0150028;
3. Port Manatee HMA Plant, 12165 U.S. 41 North, Palmetto, Manatee County; Facility ID No. 0810063;
4. Pennsylvania Street HMA Plant, 7121 Pennsylvania Street, Fort Myers, Lee County (Relocatable Plant); Facility ID No. 7774822;
5. Odessa HMA Plant, 11603 County Road 54 West, Odessa, Pasco County; Facility ID No. 1010027; and
6. Tampa HMA Plant, 5960 Jensen Road, Tampa, Hillsborough County (Relocatable Plant); Facility ID No. 7775424.

In the production of certain HMA concrete products, lime (mineral filler) is added to create better bonding between asphalt cement and aggregate, which can increase the life of the resulting asphalt concrete. Also, fibers are used in some HMA concrete products, for example open-graded friction courses, to help reinforce the asphalt concrete. Ajax submitted a request for a statewide air construction permit for two identical portable lime silos and two identical fiber feeder systems for authorization to set-up any one portable lime silo and/or any one portable fiber feeder system at any of the six existing HMA plants listed above. Other HMA plants may be added as specified in Section 2 of this permit. The following is the description of each relocatable emissions unit or activity and their operations.

Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)

The two proposed relocatable fiber feeder systems are identical emissions units. Each fiber feeder system is a portable, skid-mounted, gravimetric feeding system for feeding fibers, in an enclosed manner, into a HMA mixing drum. The fiber is purchased in plastic-wrapped bales and weigh between 700 to 900 pounds (lb). The fiber feed rate from each fiber feeder system will be approximately 0.4% of the HMA tons/hr. The estimated total annual processing rate for each fiber feeder is 2,571 bales per year, based on 700 lb/bale.

In the set-up at a HMA plant site, the fiber feeder system is initially connected to a point inside the HMA mixing drum through piping and hoses. Bales of fibers, usually weighing between 700 to 900 lb each, are stripped of the plastic-wrapping and placed into the loading bin on the fiber feeder system using a forklift. The loading bin is hydraulically raised to load the bale into the main feed hopper (hopper). Once the fiber bale is loaded into the hopper, slowly-rotating augers in the bottom of the hopper, beneath the fiber material, loosen the fibers and feed them in a fully enclosed manner into a gravimetric metering system. The fibers travel, in an enclosed manner, through the weigh scale, then through a small (~ 3 inches in diameter) enclosed auger to a blower, which causes the fiber to be fed pneumatically through hose and piping to a point inside the HMA mixing drum. Except for the bale-loading step into the main feed hopper, PM and visible emissions from the

fiber feeder systems are controlled by the HMA plant's fabric filter (FF) system (main baghouse). When the fiber feeder system is to be relocated, the piping and hoses to the HMA mixing drum are disconnected and secured on the trailer, moved to a new location and reassembled.

The fiber is manufactured by Sloss Industries Corporation under the name of Fiberand road fiber. Other names for this material are tile wool, slag wool fiber, mineral wool fiber, mineral fiber, man-made vitreous fiber and man-made mineral fiber. These fibers are produced by melting raw materials (like igneous/volcanic rock– in this case, basalt) and centrifuging and drawing or blowing the molten matter into the desirous fibrous form. Because the fibers are cooled after formation, the fibers remain non-crystalline (vitreous). After formation, the materials are sprayed with lubricating oils and binders to reduce fiber breakage and eliminate dust.

Lime Silos

The two proposed lime silos are identical emissions units. Each lime silo is a portable trailer-mounted system with a self-contained weighing and flow controlled system for feeding lime, in an enclosed manner, into a HMA process. Each silo has a capacity of 34 tons and will have a feed rate of approximately 1% of the HMA tons/hr. The projected annual throughput of each silo is 2,500 tons per year of lime. Each lime silo has an associated Belgrade Steel Tank Company pulse-jet baghouse dust collector, Model No. Belle 225, or equivalent, located atop the silo for controlling PM and visible emissions.

In the set-up at a HMA plant site, the silo is secured in a vertical position and lime is pneumatically loaded into the silo from a bulk lime tanker truck. During the loading process, air displaced from the silo passes through the silo dust collector to control PM and visible emissions. Each existing HMA plant is equipped with a main baghouse, which controls PM and visible emissions from the HMA plant dryer and associated processes. Lime from the lime silo is fed, in an enclosed manner, into an enclosed auger that carries fine particles from the HMA plant main baghouse to the HMA plant mixing drum. When the lime silo is to be relocated, the silo is emptied and secured in a horizontal position on the trailer, moved to a new location and reassembled.

REGULATORY CLASSIFICATION

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

APPENDICES

The following Appendices contain applicable requirements and are attached as a part of this permit.

Appendix A. Citation Formats

Appendix CA. List of Compliance Authorities

Appendix CC. Common Conditions

Appendix GC. General Conditions

Appendix PC. Permitted Counties

1. Permitting Authority: All documents related to applications for permits to construct, modify and operate emissions units regulated by this permit shall be submitted to the Department's Bureau of Air Regulation at 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400. Copies of all such documents shall be submitted to the appropriate Compliance Authority.
2. Compliance Authority: All documents related to compliance activities such as reports, tests and notifications shall be submitted to the appropriate Compliance Authority for the portable fiber feeder system's and the portable lime silo's location. A list of the Department's District Offices and approved Local Air Programs is provided in Appendix CA of this permit. Copies of all test reports shall be submitted to each Compliance Authority.
3. Citation Format: Appendix A of this permit identifies the format used to cite applicable requirements.
4. Common Conditions: The permittee is subject to the applicable requirements in the attached Common Conditions in Appendix CC of this permit. [Chapters 62-4, 62-210, 62-296, and 62-297, F.A.C.]
5. General Conditions: The permittee is subject to the attached General Conditions in Appendix GC of this permit. [Rule 62-4.160, F.A.C.]
6. Applicable Regulations, Forms and Application Procedures: Unless otherwise indicated in this permit, the construction and operation of the subject emissions unit or activity shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S., and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The terms used in this permit have specific meanings as defined in the applicable chapters of the Florida Administrative Code. The permittee shall use the applicable forms listed in Rule 62-210.900, F.A.C., and follow the application procedures in Chapter 62-4, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations. [Rules 62-204.800, 62-210.300 and 62-210.900, F.A.C.]
7. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
8. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No emissions unit or activity subject to this permit shall be constructed or modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]
9. Extension of Expiration Date: For good cause, the permittee may request that this air construction permit be extended. Such a request shall be submitted to the Department's Bureau of Air Regulation at least 60 days before the expiration of this permit. [Rules 62-210.300(1), 62-4.070(4) and 62-4.210, F.A.C.]
10. Air Operation Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. An air operation permit is required for commercial operation of the permitted emissions unit. The permittee shall apply for the initial air operation permits at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for an air operation permit, the applicant shall submit the appropriate application form in quadruplicate, the corresponding processing fee, compliance test results and such additional information as the Department may by law require. [Rules 62-4.030, 62-4.050, 62-4.220, 62-210.300(2), and 62-210.900, F.A.C.]
11. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least three years following the date on which such

measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-4.160(14), F.A.C.]

12. Facility Relocation: The permittee is authorized to relocate a lime silo and/or a fiber feeder system to any site within a previously "permitted county" as identified in Appendix PC of this permit. With a 1-day advance notification (phone call, e-mail, facsimile or office visit), the permit authorizes relocation of the portable unit to any site within the permitted counties. For each relocation and within at least five days of relocating, the permittee must submit a "Facility Relocation Notification Form" [DEP Form No. 62-210.900(6), F.A.C.] to the current Compliance Authority and the new Compliance Authority identifying the move. This air construction permit does not relieve the owner from complying with other local provisions such as zoning requirements. [Rules 62-4.070(3) and 62-210.370(4), F.A.C.]

13. Adding New Permitted Counties: A portable lime silo and/or a fiber feeder system shall only be relocated to sites within previously permitted counties as identified in Appendix PC of this permit. To add a county to the list of permitted counties, the permittee shall provide the Bureau of Air Regulation with a letter of request with the following information: identification of the affected HMA plant and its air operation permit; a statement that there have been no physical changes made to the portable lime silos and fiber feeder systems nor any change in the method of operation; the latest compliance test report; a list of previously permitted counties; and the new county to be added and the specific site where a portable lime silo and/or a fiber feeder system will be located in the future (if known). A copy of this information shall be submitted to the appropriate Compliance Authority for the proposed new site. The Bureau of Air Regulation will process the request as a modification of the air construction permit. The permittee must publish a new Public Notice provided by the Bureau of Air Regulation in a newspaper of general circulation for the new county. The Public Notice provides administrative rights for affected parties to petition for an administrative hearing or provide comments on the draft permit. If there are no substantial comments and no petitions for administrative hearings, the Department will issue a final air construction permit and a revised air operation permit recognizing the new permitted county. The permittee is authorized to relocate a portable lime silo and/or a fiber feeder system upon issuance of the final modified air construction permit and issuance of the revised air operation permit for the HMA plant. [Rules 62-210.300(1) & (2) and 62-210.350, F.A.C.]

A. Portable Lime Silos (2)

This section of the permit addresses the following emissions units or activities.

ARMS ID No.	Emissions Unit Description
001	Portable Lime Silo, 34 ton
002	Portable Lime Silo, 34 ton

EQUIPMENT

1. Relocatable Portable Lime Silos: The permittee is authorized to construct (assemble, dismantle and reassemble) two relocatable portable lime silos with an integral dust collector for controlling particulate matter and visible emissions from its operation. Each lime silo has a capacity of 34 tons. Each lime silo will typically process approximately 2,500 tons per year of lime based on a blend of approximately 1% by weight of the HMA processing rate. The dust collector shall be a Belgrade Steel Tank Company pulse-jet baghouse dust collector, Model No. Belle 225 (silo dust collector), or equivalent, located atop the silo. Each silo dust collector shall be designed to achieve an outlet dust loading of 0.01 grains/scf of exhaust. For maintenance, collector bags or cartridges shall only be replaced with bags that meet this design specification. Each portable lime silo is designed to be dismantled, moved to a new location and reassembled. [Design and Application No. 7775592-001-AC]

PERFORMANCE RESTRICTIONS

2. Lime Usage at Existing HMA Plants: The usage of the lime will not increase the permitted production rate nor the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. [Rule 62-4.070(3), F.A.C.]

3. Permitted Counties: The permittee may relocate a lime silo to any HMA plant site within a previously permitted county as identified in Appendix PC. The air operation permit for each HMA plant must also authorize this equipment prior to relocation. The conditions of this permit apply to each lime silo as a whole regardless of the sites at which it may operate during any year. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

4. Hours of Operation: The hours of operation are not limited (8760 hours per year). [Rule 62-210.200 (Definitions-PTE), F.A.C. and Application No. 7775592-001-AC]

5. Operations – Each Lime Silo:

   a. Pneumatic Filling From and Emptying Into a Bulk Lime Tanker Truck: The associated lime silo dust collector shall be in operation while the silo is being pneumatically filled from a bulk lime tanker truck and while the silo is being pneumatically emptied back into a bulk lime tanker truck.

   b. Making Asphalt Product: During asphalt production, lime from the lime silo shall be fed in an enclosed manner into the enclosed auger that carries fine particles from the HMA plant's main baghouse to the HMA mixing drum in order to maintain the operation under negative pressure. The lime silo's baghouse shall be operated as necessary during operations with the HMA plant.

EMISSIONS STANDARDS

6. Dust Collector Design Specifications for Control of Particulate Matter (PM): The minimum design specifications of the dust collector control system, including replacement filters, shall meet 0.01 grains per standard cubic foot. Since PM emissions are controlled by a dust collector and the potential emissions are less than 100 tons/year, the Department will establish an alternative visible emissions standard of 5% opacity in lieu of PM testing. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; and Application No. 7775592-001-AC]

7. Visible Emissions – Each Lime Silo:

   a. During the filling and emptying of a lime silo with a bulk lime tanker truck and during operations with a HMA plant, visible emissions from the lime silo baghouse shall not exceed 5% opacity, as determined by EPA Method 9 and in accordance with Rule 62-297.400, F.A.C. [Rule 62-297.620(4), F.A.C. and Application No. 7775592-001-AC]

   b. *Hillsborough County*: "The permittee shall not cause, permit or allow any visible emissions greater than 5% opacity from any (1) loading or unloading of materials to or from containers such as railcars, trucks, ships, storage structures and stockpiles, (2) receiving hoppers, (3) belt conveyors, and (4) static drop transfer points, when operating in the following designated air quality maintenance area for particulate matter: "That portion of Hillsborough County which falls within the area of the circle having a center point at the intersection of U. S. 41 South and State Road 60 and a radius of 12 kilometers." [Rules 62-204.340 and 62-297.400, F.A.C.; and Rule 1-3.52.2, Rules of EPCHC]

EMISSIONS PERFORMANCE TESTING

[Rule 62-297.400, F.A.C.]

8. Initial and Annual Compliance Tests – Each Lime Silo: For each lime silo, the loading of lime from a truck is a batch operation. An initial and subsequent annual compliance test using EPA Method 9 shall be conducted on the lime silo's baghouse dust collector system to determine compliance with the visible emissions standard. The compliance test shall be equal to the duration of the batch cycle or operation completion time pursuant to Rule 62-297.310(4)(a)2.a., F.A.C. The annual visible emissions test shall be conducted every fiscal year (October 1 - September 30) at only one HMA plant. The test report shall be sent to the Compliance Authority, for the HMA plant tested, with copies to the other Compliance Authorities where these emissions units or activities are authorized to operate in Appendix PC. Tests shall also be conducted in accordance with the testing requirements specified in Appendix CC of this permit. [Rules 62-297.310(4)(a)2.a. and 62-297.310(7)(a)1, F.A.C.]

9. Tests Prior to Renewal: Within the 12-month period prior to expiration of the operation permit, the baghouse dust collector system's exhaust shall be tested to demonstrate compliance with the visible emissions standards of this permit. [Rules 62-297.310(4)(a)2.a. and (7)(a)3., F.A.C.]

10. Test Notification: At least 15 days prior to conducting any tests, the permittee shall notify the Compliance Authority for the site to be tested in writing of the following information: the date, time, and place of each such test; and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9., F.A.C.; and Rule 1-3.24, EPCHC]

RECORDS AND REPORTS

11. Monthly Records: The permittee shall record the following information in a written log for the operation at each site: tons of material (lime) processed by site. [Rule 62-4.070(3), F.A.C.]

12. O&M Plan: The permittee shall keep an operation and maintenance (O&M) plan for the dust collector control systems on each lime silo. The O&M plan shall include: the collector bag or filter specifications and a plan for regular maintenance. [Rule 62-4.070(3), F.A.C.]

B. Portable Fiber Feeder Systems (2)

This section of the permit addresses the following emissions units or activities.

ARMS ID No.	Emissions Unit Description
003	Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)
004	Krendl Machine Company, Model #9000 Gravimetric Fiber Feeder System (fiber feeder system)

EQUIPMENT

1. Relocatable Portable Fiber Feeder Systems: The permittee is authorized to construct (assemble, dismantle and reassemble) two relocatable portable fiber feeder systems to inject fibers into the HMA plant. Each fiber feeder system will typically process approximately 900 tons per year of fiber based on a blend of approximately 0.4% by weight of the HMA processing rate. The fiber feeder system is connected through hose and piping to the HMA plant's mixing drum and maintained under negative pressure by exhausting the air through the integral HMA plant's main baghouse dust collector. For maintenance, collector bags will only be replaced with bags that meet the design specification of the HMA plant's main baghouse dust collector. Each portable fiber feeder system (2) is designed to be dismantled, moved to a new location and reassembled. [Design and Application No. 7775592-001-AC]

PERFORMANCE RESTRICTIONS

2. Fiber Usage at Existing HMA Plants: The usage of the fiber material will not increase the permitted production rate nor the permitted production capacity of each affected HMA plant, but allows the use of new materials in the production of a HMA product. [Rule 62-4.070(3), F.A.C.]

3. Permitted Counties: The permittee may relocate a fiber feeder system to any HMA plant site within a previously permitted county as identified in Appendix PC. The air operation permit for each HMA plant must also authorize this equipment prior to relocation. The conditions of this permit apply to each lime silo as a whole regardless of the sites at which it may operate during any year. [Rules 62-4.070(3) and 62-210.300(1), F.A.C.]

4. Hours of Operation: The hours of operation are not limited (8760 hours per year). [Rule 62-210.200 (Definitions-PTE), F.A.C. and Application No. 7775592-001-AC]

5. Operations – Each Fiber Feeder System: Prior to and during operations, the fiber feeder system shall be connected through hose and piping to the HMA plant's mixing drum and maintained under negative pressure by exhausting the air through the integral HMA plant's main baghouse dust collector. [Rule 62-4.070(3), F.A.C. and Application No. 7775592-001-AC]

RECORDS AND REPORTS

6. Monthly Records: The permittee shall record the following information in a written log for the operation at each site: tons of fiber material processed by site. [Rule 62-4.070(3), F.A.C.]

CONTENTS

SECTION 4. APPENDIX A
CITATION FORMATS

The following examples illustrate the format used in the permit to identify applicable permitting actions and regulations.

REFERENCES TO PREVIOUS PERMITTING ACTIONS

Old Permit Numbers

Example: Permit No. AC50-123456 or Air Permit No. AO50-123456

Where: "AC" identifies the permit as an Air Construction Permit
"AO" identifies the permit as an Air Operation Permit
"123456" identifies the specific permit project number

New Permit Numbers

Example: Permit Nos. 099-2222-001-AC, 099-2222-001-AF, 099-2222-001-AO, or 099-2222-001-AV

Where: "099" represents the specific county ID number in which the project is located
"2222" represents the specific facility ID number
"001"identifies the specific permit project
"AC" identifies the permit as an air construction permit
"AF" identifies the permit as a minor federally enforceable state operation permit
"AO" identifies the permit as a minor source air operation permit
"AV" identifies the permit as a Title V Major Source Air Operation Permit

PSD Permit Numbers

Example: Permit No. PSD-FL-317

Where: "PSD" means issued pursuant to the Prevention of Significant Deterioration of Air Quality
"FL" means that the permit was issued by the State of Florida
"317" identifies the specific permit project

RULE CITATION FORMATS

Florida Administrative Code (F.A.C.)

Example: [Rule 62-213.205, F.A.C.]

Means: Title 62, Chapter 213, Rule 205 of the Florida Administrative Code

Code of Federal Regulations (CFR)

Example: [40 CRF 60.7]

Means: Title 40, Part 60, Section 7

SECTION 4. APPENDIX CA
LIST OF COMPLIANCE AUTHORITIES

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION – DISTRICT OFFICES

NORTHEAST DISTRICT
Air Resource Section
7825 Baymeadows Way, Suite 200 B
Jacksonville, FL 32256-7590
Phone: (904) 807-3300

Counties Served: Alachua, Baker, Bradfor, Clay, Columbia, Dixie, Duval, Flagler, Gilcgrist, Hamilton, Jefferson (eastern half), Lafayette, Levy, Madison, Nassau, Putnam, Saint Jones, Suwannee, Taylor and Union

SOUTHEAST DISTRICT
Air Resource Section
400 North Congress Avenue, Suite 200
West Palm Beach, FL 33401
Phone: (561) 681-6600

Counties Served: Broward, Martin, Miami-Dade, Okeechobee, Palm Beach and Saint Lucie

NORTHWEST DISTRICT
Air Resource Section
160 Governmental Center, Suite 308
Pensacola, FL 32502-5794
Phone: (850) 595-8300

Counties Served: Bay, Calhoun, Escambia, Franklin, Gadsden, Gulf, Holmes, Jackson, Jefferson (western half), Leon, Liberty, Okaloosa, Santa Rosa, Wakulla and Walton

CENTRAL DISTRICT
Air Resource Section
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767
Phone: (407) 894-7555

Counties Served: Brevard, Indian River, Lake, Marion, Orange, Osceola, Seminole and Volusia

SOUTH DISTRICT
Air Resource Section
2295 Victoria Avenue, Suite 364
P.O. Box 2549
Fort Myers, FL 33902-2549
Phone: (239) 332-6975

Counties Served: Charlotte, Collier, Glades, Hendry, Highlands, Lee and Monroe

SOUTHWEST DISTRICT
Air Resource Section
13051 N. Telecom Parkway
Temple Terrace, FL 33637-0926
Phone: (813) 632-7600

Counties Served: Citrus, Desoto, Hardee, Hernando, Hillsborough, Manatee, Pasco, Pinellas, Polk, Sarasota and Sumter

In addition to the Department's District Offices, several counties operate approved local air programs offices as shown on the following page.

LIST OF COMPLIANCE AUTHORITIES

APPROVED LOCAL AIR PROGRAMS

Eight approved local air programs conduct ambient air monitoring and take lead responsibility for air compliance and enforcement activities in their counties. Six of these programs are also delegated district level air permitting authority.

Broward County
Environmental Protection and Growth Management Department
Pollution Prevention, Remediation and Air Quality Division
One North University Avenue, Suite 203
Plantation, Florida 33324-2038
Phone: (954) 519-1220
Inside the Department's Southeast District Area

Miami-Dade County
Department of Environmental Resources Management
Air Quality Management Division
701 NW 1st Court, Suite 400
Miami, Florida 33136
Phone: (305) 372-6925
Inside the Department's Southeast District Area

Duval County
Environmental and Compliance Department
Environmental Quality Division
117 W. Duval Street, Suite 225
Jacksonville, Florida 32202-3700
Phone: (904) 630-4900
Inside the Department's Northeast District Area

Hillsborough County
Environmental Protection Commission
Air Management Division
3629 Queen Palm Drive
Tampa, Florida 33619
Phone: (813)-627-2600
Inside the Department's Southwest District Area

Orange County
Environmental Protection Division
Air Section
800 Mercy Drive, Suite 4
Orlando Florida 32308-7896
Phone: (407) 836-1447
Inside the Department's Central District Area

Palm Beach County Health Department
Division of Environmental Science & Engineering
Air Pollution Control Section
901 Evernia Street
P.O. Box 29
West Palm Beach, Florida 33401-0029
Phone: (561) 840-4500
Inside the Department's Southeast District Area

Pinellas County
Department of Environmental Management
Air Quality Division
300 South Garden Avenue
Clearwater, Florida 33756-5424
Phone: (727) 464-4422
Inside the Department's Southwest District Area

Sarasota County
Water Resources Department
Pollution Control Division
1301 Cattlemen Road, Building E
Sarasota, Florida 34232-6244
Phone: (941) 861-6230
Inside the Department's Southwest District Area

SECTION 4. APPENDIX CC
COMMON CONDITIONS

{Permitting Note: Unless otherwise specified in the permit, the following conditions apply to all emissions units and activities at the facility.}

EMISSIONS AND CONTROLS

1. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations. [Rule 62-4.130, F.A.C.]

2. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly. [Rule 62-210.650, F.A.C.]

3. Excess Emissions Allowed: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. This state provision cannot be used to vary any applicable NSPS requirements from 40 CFR 60. [Rule 62-210.700(1), F.A.C.]

4. Excess Emissions Prohibited: Excess emissions caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

5. Excess Emissions - Notification: In case of excess emissions resulting from malfunctions, the permitee shall notify the Department or the appropriate Local Program in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the Department. [Rule 62-210.700(6), F.A.C.]

6. VOC or OS Emissions: No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

7. Objectionable Odor Prohibited: No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

8. General Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20 percent opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

9. Unconfined Particulate Emissions: During the construction period, unconfined particulate matter emissions shall be minimized by dust suppressing techniques such as covering and/or application of water or chemicals to the affected areas, as necessary. When assembling or dismantling this portable equipment, unconfined emissions of particulate matter shall be minimized by dust suppressing techniques available at the HMA plant, such as the application of water to the affected areas as necessary. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

10. Required Number of Test Runs: For mass emission limitations, a compliance test shall consist of three complete and separate determinations of the total air pollutant emission rate through the test section of the stack or duct and three complete and separate determinations of any applicable process variables corresponding to the three distinct time periods during which the stack emission rate was measured; provided, however, that three complete and separate determinations shall not be required if the process variables are not subject to variation during a compliance test, or if three determinations are not necessary in order to calculate the unit's emission rate. The three required test runs shall be completed within one consecutive five-day period. In the event that a sample is lost or one of the three runs must be discontinued because of circumstances beyond the control of the owner or operator, and a valid third run cannot be

obtained within the five-day period allowed for the test, the Secretary or his or her designee may accept the results of two complete runs as proof of compliance, provided that the arithmetic mean of the two complete runs is at least 20% below the allowable emission limiting standard. [Rule 62-297.310(1), F.A.C.]

11. Operating Rate During Testing: Testing of emissions shall be conducted with the emissions unit operating at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the maximum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test rate until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

12. Calculation of Emission Rate: For each emissions performance test, the indicated emission rate or concentration shall be the arithmetic average of the emission rate or concentration determined by each of the three separate test runs unless otherwise specified in a particular test method or applicable rule. [Rule 62-297.310(3), F.A.C.]

13. Applicable Test Procedures: Tests shall be conducted in accordance with all applicable requirements of Chapter 62-297, F.A.C.

    a. *Required Sampling Time.*

        1) Unless otherwise specified in the applicable rule, the required sampling time for each test run shall be no less than one hour and no greater than four hours, and the sampling time at each sampling point shall be of equal intervals of at least two minutes.

        2) Opacity Compliance Tests. When either EPA Method 9 or DEP Method 9 is specified as the applicable opacity test method, the required minimum period of observation for a compliance test shall be sixty (60) minutes for emissions units which emit or have the potential to emit 100 tons per year or more of particulate matter, and thirty (30) minutes for emissions units which have potential emissions less than 100 tons per year of particulate matter and are not subject to a multiple-valued opacity standard. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. For batch, cyclical processes, or other operations which are normally completed within less than the minimum observation period and do not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time.

    b. *Minimum Sample Volume.* Unless otherwise specified in the applicable rule or test method, the minimum sample volume per run shall be 25 dry standard cubic feet.

    c. *Required Flow Rate Range.* For EPA Method 5 particulate sampling, acid mist/sulfur dioxide, and fluoride sampling which uses Greenburg Smith type impingers, the sampling nozzle and sampling time shall be selected such that the average sampling rate will be between 0.5 and 1.0 actual cubic feet per minute, and the required minimum sampling volume will be obtained.

    d. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1.

    e. *Calibration of Sampling Equipment.* Calibration of the sampling train equipment shall be conducted in accordance with the schedule shown in Table 297.310-1, F.A.C.

    f. *Allowed Modification to EPA Method 5.* When EPA Method 5 is required, the following modification is allowed: the heated filter may be separated from the impingers by a flexible tube.

    [Rule 62-297.310(4), F.A.C.]

14. Determination of Process Variables

    a. *Required Equipment.* The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

    b. *Accuracy of Equipment.* Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted

to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value. [Rule 62-297.310(5), F.A.C.]

15. Sampling Facilities: The permittee shall install permanent stack sampling ports and provide sampling facilities that meet the requirements of Rule 62-297.310(6), F.A.C.

16. Test Notification: The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. [Rule 62-297.310(7)(a)9, F.A.C.]

17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C.]

18. Test Reports: The owner or operator of an emissions unit for which a compliance test is required shall file a report with the Department on the results of each such test. The required test report shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. As a minimum, the test report, other than for an EPA or DEP Method 9 test, shall provide the following information:

    1. The type, location, and designation of the emissions unit tested.
    2. The facility at which the emissions unit is located.
    3. The owner or operator of the emissions unit.
    4. The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
    5. The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
    6. The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
    7. A sketch of the duct within 8 stack diameters upstream and 2 stack diameters downstream of the sampling ports, including the distance to any upstream and downstream bends or other flow disturbances.
    8. The date, starting time and duration of each sampling run.
    9. The test procedures used, including any alternative procedures authorized pursuant to Rule 62-297.620, F.A.C. Where optional procedures are authorized in this chapter, indicate which option was used.
    10. The number of points sampled and configuration and location of the sampling plane.
    11. For each sampling point for each run, the dry gas meter reading, velocity head, pressure drop across the stack, temperatures, average meter temperatures and sample time per point.
    12. The type, manufacturer and configuration of the sampling equipment used.
    13. Data related to the required calibration of the test equipment.
    14. Data on the identification, processing and weights of all filters used.
    15. Data on the types and amounts of any chemical solutions used.
    16. Data on the amount of pollutant collected from each sampling probe, the filters, and the impingers, are reported separately for the compliance test.
    17. The names of individuals who furnished the process variable data, conducted the test, analyzed the samples and prepared the report.

18. All measured and calculated data required to be determined by each applicable test procedure for each run.
19. The detailed calculations for one run that relate the collected data to the calculated emission rate.
20. The applicable emission standard and the resulting maximum allowable emission rate for the emissions unit plus the test result in the same form and unit of measure.
21. A certification that, to the knowledge of the owner or his authorized agent, all data submitted are true and correct. When a compliance test is conducted for the Department or its agent, the person who conducts the test shall provide the certification with respect to the test procedures used. The owner or his authorized agent shall certify that all data required and provided to the person conducting the test are true and correct to his knowledge.

[Rule 62-297.310(8), F.A.C.]

RECORDS AND REPORTS

19. Records Retention: All measurements, records, and other data required by this permit shall be documented in a permanent, legible format and retained for at least five (5) years following the date on which such measurements, records, or data are recorded. Records shall be made available to the Department upon request. [Rule 62-4.160(14), F.A.C.]
20. Annual Operating Report: The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by March 1st of each year. [Rule 62-210.370(2), F.A.C.]

GENERAL CONDITIONS

The permittee shall comply with the following general conditions from Rule 62-4.160, F.A.C.

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

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

3. As provided in Subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey and vested rights or any exclusive privileges. Neither 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. This permit is not a waiver or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use 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.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of F.S. and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

   a. Have access to and copy and records that must be kept under the conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit, and,
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. 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 provide the Department with the following information:

   a. A description of and cause of non-compliance; and

   b. The period of noncompliance, including 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 for revocation of this permit.

9. 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 involving the permitted source arising under the F.S. or Department rules, except where such use is prescribed by Sections 403.73 and 403.111, F.S. Such evidence

shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and F.S. after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by F.S. or Department rules.

11. This permit is transferable only upon Department approval in accordance with Rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

    a. Determination of Best Available Control Technology (Not Applicable);
    b. Determination of Prevention of Significant Deterioration (Not Applicable); and
    c. Compliance with New Source Performance Standards (Not Applicable).

14. The permittee shall comply with the following:

    a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

    b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application or this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

    c. Records of monitoring information shall include:

        1) The date, exact place, and time of sampling or measurements;
        2) The person responsible for performing the sampling or measurements;
        3) The dates analyses were performed;
        4) The person responsible for performing the analyses;
        5) The analytical techniques or methods used; and
        6) The results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SECTION 4. APPENDIX PC
PERMITTED COUNTIES

The permittee has provided proof of publication of the Department's Intent to Issue Air Permit in a newspaper of general circulation for the counties identified in the following table. The permittee is authorized to operate at any site within a permitted county by submitting a Facility Relocation Notification Form No. 62-210.900(6), F.A.C., at least 5 days prior to relocating. This air permit does not relieve the owner from complying with other local provisions such as zoning requirements.

Permitted Counties	Publication Date	Permitted Counties	Publication Date	Permitted Counties	Publication Date
Alachua		Hamilton		Okeechobee	
Baker		Hardee		Orange	
Bay		Hendry		Osceola	
Bradford		Hernando		Palm Beach	
Brevard		Highlands		Pasco	Pending
Broward		Hillsborough	Pending	Pinellas	
Calhoun		Holmes		Polk	
Charlotte	Pending	Indian River		Putnam	
Citrus		Jackson		St. Johns	
Clay		Jefferson		St. Lucie	
Collier		Lafayette		Santa Rosa	
Columbia		Lake		Sarasota	Pending
Dade		Lee	Pending	Seminole	
DeSoto		Leon		Sumter	
Dixie		Levy		Suwannee	
Duval		Liberty		Taylor	
Escambia		Madison		Union	
Flagler		Manatee	Pending	Volusia	
Franklin		Marion		Wakulla	
Gadsden		Martin		Walton	
Gilchrist		Monroe		Washington	
Glades		Nassau			
Gulf		Okaloosa			

Livingston, Sylvia

From: Lynn Robinson [lrobinson@sesfla.com]
Sent: Thursday, July 16, 2009 10:25 AM
To: Livingston, Sylvia
Cc: 'Vince Hafeli'
Subject: RE: Ajax Paving Industries of Florid, LLC - STATEWIDE RELOCATABLE SILOS/FEEDERS; 7775592-001-AC

Sylvia,

I can view the documents.

Thank you.

Regards,
Lynn Robinson, P.E.

Lynn Robinson, P.E.
Permitting Manager
Southern Environmental Sciences, Inc.
1204 North Wheeler Street
Plant City, FL 33563
813 752 5014 Tel
813 752 2475 Fax

-----Original Message-----
From: Livingston, Sylvia [mailto:Sylvia.Livingston@dep.state.fl.us]
Sent: Thursday, July 16, 2009 9:30 AM
To: vhafeli@ajaxpaving.com
Cc: lrobinson@sesfla.com; campbell@epchc.org; scameron@scgov.net; Nasca, Mara; Ajay.Satyal@dep.state.fl.us; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Ajax Paving Industries of Florid, LLC - STATEWIDE RELOCATABLE SILOS/FEEDERS; 7775592-001-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

Note: We must receive verification that you are able to access the documents. Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/7775592.001.AC.D_pdf.zip

Owner/Company Name: AJAX PAVING INDUSTRIES OF FLORIDA, LLC
Facility Name: STATEWIDE RELOCATABLE SILOS/FEEDERS
Project Number: 7775592-001-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: SARASOTA
Processor: Bruce Mitchell

Livingston, Sylvia

From: Nasca, Mara
Sent: Thursday, July 16, 2009 9:38 AM
To: Livingston, Sylvia
Cc: Zhang-Torres
Subject: RE: Ajax Paving Industries of Florid, LLC - STATEWIDE RELOCATABLE SILOS/FEEDERS; 7775592-001-AC

Thanks Sylvia
I hope all is well in Tallahassee!
With future notifications, please just send to our Permitting Supervisor, Cindy Zhang-Torres, P.E.
Thanks,
Mara

From: Livingston, Sylvia
Sent: Thursday, July 16, 2009 9:30 AM
To: 'vhafeli@ajaxpaving.com'
Cc: 'lrobinson@sesfla.com'; 'campbell@epchc.org'; 'scameron@scgov.net'; Nasca, Mara; 'Ajay.Satyal@dep.state.fl.us'; Gibson, Victoria; Mitchell, Bruce; Walker, Elizabeth (AIR)
Subject: Ajax Paving Industries of Florid, LLC - STATEWIDE RELOCATABLE SILOS/FEEDERS; 7775592-001-AC

Dear Sir/ Madam:

Attached is the official **Notice of Intent to Issue** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send".

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Owner/Company Name: AJAX PAVING INDUSTRIES OF FLORIDA, LLC
Facility Name: STATEWIDE RELOCATABLE SILOS/FEEDERS
Project Number: 7775592-001-AC
Permit Status: DRAFT
Permit Activity: CONSTRUCTION
Facility County: SARASOTA
Processor: Bruce Mitchell

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at http://www.dep.state.fl.us/air/eproducts/apds/default.asp .

Permit project documents are addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any