

Southern Environmental Sciences, Inc.

1204 North Wheeler Street Plant City, Florida 33563-2354 (813) 752-5014 Fax (813) 752-2475

July 25, 2012 Via Email scott.sheplak@dep.state.fl.us

RECEIVED

AUG 06 2012

DIVISION OF AIR
RESOURCE MANAGEMENT

Mr. Scott Sheplak, P.E
Florida Dept. of Environmental Protection
Division of Air Resource Management
2600 Blair Stone Road, MS#5505
Tallahassee, FL 32399-2400

Re: Ajax Paving Industries of Florida, LLC (Ajax)
Request to Exempt 4 Emissions Units (EU) Under Air Permit No. 7775592-001-AC
Issued: August 11, 2009; Expired: July 1, 2011
EU 001 & EU 002: Two (2) Portable Lime Silos (Belgrade Steel Tank Co.)
EU 003 & EU 004: Two (2) Portable Fiber Feeders (Krendl Machine Co.)
EUs 001, 002, 003, 003 Used at any of Six (6) Ajax Drum Mix Asphalt Plants

Dear Mr. Sheplak:

On behalf of Ajax Paving Industries of Florida, LLC (Ajax) and based on information presented in this letter, Southern Environmental Sciences, Inc. (SES) requests that DEP make a determination in regard to the referenced Air Permit No. 7775592-001-AC that the two (2) portable lime storage silos and two (2) fiber feeders are exempt from air permitting as allowed in DEP Rule 62-210.300(3)(b)1., F.A.C. We also ask that once these four pieces of equipment are determined to be exempt, that annual visible emission (VE) compliance testing of the two silos no longer be required, and that all of the conditions of Air Permit No. 7775592-001-AC be "deleted", thus essentially "vacating" or "deleting" or "retiring" Air Permit No. 7775592-001-AC in its entirety. This letter is being sent as follow-up and in agreement with my communications with Mr. Jeff Koerner, Mr. Syed Arif, and yourself in this matter.

A permitting fee check in the amount of \$250.00, payable to Florida Dept. of Env. Protection, will be sent to you under separate cover for this determination and final action by your office in regard to Air Permit No. 7775592-001-AC. Once you have a chance to review this letter and attachments, please call me if you have any questions.

As discussed by telephone with Mr. Syed Arif and you, after further evaluation of the lime silos and fiber feeders we feel these four pieces of equipment should be exempted from air permitting. Information is provided in Attachments A, B, and C to support our requests stated in the above paragraph. Attachment A provides lime and fiber usage, lime silo PM estimates, and the basis for exemption from air permitting for the lime silos and the fiber feeders. Attachment B provides VE test reports for the two lime silos during 2009-2012 demonstrating the silo vent dust collector exhaust opacity is consistently less than 5% (6-minute average basis). Attachments A and B include the Air Permit ID No. for each of the six Ajax asphalt plants. Attachment C illustrates the integral nature of the silo vent dust collectors on these portable lime storage silos. The dust collectors are permanently attached to the silo vents.

Attachment A contains "PM Emissions Estimates and Basis of Exemptions from Air Permitting (Sheets 1 and 2)". The Ajax - Nokomis Asphalt Plant has the largest allowable annual "hot mix asphalt" (HMA)

production (1,200,000 ton/yr; See Sheet 1 of 2, Column 6) of the six Ajax asphalt plants shown in Attachment A. These are the same six asphalt plants addressed in Air Permit No. 7775592-001-AC which, from time to time, may have one lime silo and/or one fiber feeder operating at the asphalt plant under its Air Operation (AO) permit. The Ajax – Odessa Asphalt Plant is permitted for up to 1,000,000 ton/yr HMA production and the other four Ajax Asphalt Plants are permitted for up to 500,000 ton/yr (Tampa, Palmetto, Punta Gorda, and Fort Myers asphalt plants). Estimated actual annual usage of lime (Column 11) and fiber (Column 8) are much less than the maximum annual usage of lime (Column 12) and fiber (column 13), respectively. Sheet 2 of 2 provides estimated particulate matter (PM) emissions from a portable lime silo with 1,200,000 ton/yr and 500,000 ton/yr maximum lime usage. Lime is used at a rate of 1% of HMA production. Therefore 12,000 ton/yr is the maximum lime usage for the case of an asphalt plant with 1,200,000 ton/yr HMA production.

Lime Silo Emissions Estimates & Basis for Exemption: The lime silos have integral silo vent dust collectors. See Attachment C which illustrates the integral nature of the silo vent dust collectors on these portable lime storage silos. The lime silos are used on an as needed basis at asphalt plants. The lime silo is therefore not an inherent part of the drum mix asphalt plant. Based on these characteristics, the relevant PM emissions are those using the AP-42 "controlled" emission factors. Based on the controlled PM emissions estimate of 0.006 ton/yr for 12,000 ton/yr lime usage, each lime silo is exempt from air permitting under DEP Rule 62-210.300(3)(b)1., F.A.C. ("Generic Emissions Unit or Activity Exemptions"), *i.e.* less than 5.0 ton/yr, *etc.* In comparison, the uncontrolled PM emissions are estimated at 4.3 ton/yr for 12,000 ton/yr lime usage. Further, as noted above, actual lime usage is estimated to be much less than the maximum usage and therefore actual PM emissions would be significantly less than the maximum estimated emissions. In addition, as stated above, VE tests of lime silo vent dust collector exhausts provided in Attachment B show opacity levels of less than 5% (6-minute average basis).

Fiber Feeder Emissions & Basis for Exemption: There are no AP-42 emission factors for fiber feeder PM emissions. PM emissions only occur when a fiber bale is loaded into the feed hopper, and these PM emissions are considered negligible. In Permit No. 7775592-001-AC, no annual VE testing is required for the fiber feeders, and no annual VE testing is required in the AO permits of the six Ajax drum mix asphalt plants. PM emissions from fiber bale loading into the hopper may be conservatively estimated using the same emission factors as used in Sheet 2 of 2 in Attachment A for the lime silo baghouse PM emissions. With this conservative approach, the fiber feeder PM emissions are less than lime silo emissions since annual fiber use (ton/yr) (See Sheet 1 of 2, Column 13) is less than annual lime use (ton/yr) (See Sheet 1 of 2, Column 12) in all cases. On this basis, each fiber feeder is exempt from air permitting under DEP Rule 62-210.300(3)(b)1., F.A.C. ("Generic Emissions Unit or Activity Exemptions"), *i.e.* less than 5.0 ton/yr, *etc.*

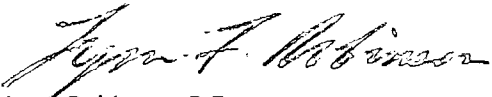
After DEP determines the two portable lime storage silos and two portable fiber feeders are exempt from air permitting, public notice will be published in each county where notice was published during the permitting process for Permit No. 7775592-001-AC (Pasco, Hillsborough, Manatee, Sarasota, Charlotte, and Lee counties). After these public notices are published, we would expect DEP to take final action to "vacate" or "delete" or "retire" Air Permit No. 7775592-001-AC in its entirety. After final DEP action on Permit No. 7775592-001-AC, and when appropriate, the air operation (AO) permits of the

six Ajax drum mix asphalt plants will be addressed. We expect the six AO permits to be amended, removing the emission unit (EU) designations of this equipment, with a lime silo and a fiber feeder described as exempt activities and allowing one lime silo and/or one fiber feeder to be operated at an asphalt plant. As an example of an asphalt plant permit which mentions a lime silo as exempt and without designating the lime silo as an emission unit, please see Permit No. 1030026-009-AO (combined with Permit No. 1030026-010-AC) for an asphalt plant in Pasco County with allowable annual HMA production of 1,000,000 ton/yr.

Thank you again for your guidance in this matter and please call me if you have any questions.

Sincerely,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Lynn Robinson, P.E.
Permitting Manager

Enclosures: Attachment A – Lime & Fiber Usage and PM Emissions Estimates for Exemptions
Attachment B – Reports of Visible Emissions Observations of Ajax Lime Silo Baghouses:
2009 – 2012
Attachment C – Manufacturer Information on Baghouse for Storage Silo

Ec: Mr. Vince L. Hafeli, Vice President, Plants & Materials, Ajax Paving Industries of Florida, LLC
vhafeli@ajaxpaving.com
Mr. Syed Arif, FDEP, Bureau of Air Regulation, Tallahassee Syed.Arif@dep.state.fl.us