

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

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



SOUTHERN
ENVIRONMENTAL
SCIENCES, INC.

Attachment A:

**Lime & Fiber Usage and PM Emissions Estimates for Exemption of
Two Portable Lime Silos and Two Portable Fiber Feeders
Air Permit No. 7775592-001-AC
(2 pages)**

Southern Environmental Sciences, Inc.

2 Portable Lime Silos and 2 Portable Fiber Feeders for Use at Hot Mix Asphalt (HMA) Plants of Ajax Paving Industries

Client	Ajax Paving Industries of Florida, LLC	Job No. 12P225
Subject	Modification of Air Permit 7775592-001-AC to Exempt 2 Portable Lime Silos & 2 Fiber Feeders	7/25/2012
Task	Review Emissions Estimates for Air Permitting Exemptions of 2 Silos & 2 Feeders	Sheet 1 of 2

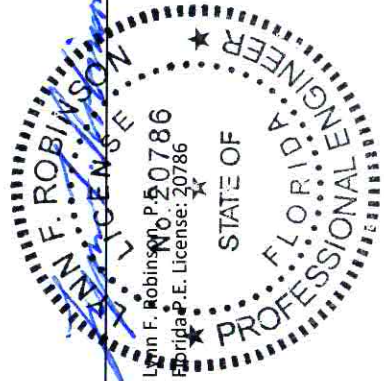
Hot Mix Asphalt (HMA) Plants and Usage of Lime & Fiber

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
FDEP Air Permit ID No.	Plant Name	County	Agency/FDEP District	Allowed HMA Production (ton/hr)	Allowed HMA Production (ton/yr)	Hourly Fiber Feed Rate* (ton/hr)	Annual Fiber Usage, Est. Actual (ton/yr)**	Hourly Feed Rate*** (ton/hr)	Hourly Lime Silo Loading Rate**** (ton/hr)	Annual Lime Usage, Est. Actual (ton/yr)**	Annual Lime Usage, Max. (ton/yr)*****	Annual Fiber Usage, Max. (ton/yr)*****	Allowed Operations of HMA Plant Drum Mixer (hr/yr)
1150103	Nokomis	Sarasota	Sarasota Co.	300	1,200,000	1.2	275	3.0	25	750	12,000	4,800	4,000
0150028	Punta Gorda	Charlotte	SD	225	500,000	0.9	125	2.3	25	250	5,000	2,000	8,760
0810063	Palmetto	Manatee	SWD	300	500,000	1.2	350	3.0	25	1,000	5,000	2,000	8,760
7774822	Ft. Myers	Lee	SD	400	500,000	1.6	350	4.0	25	1,000	5,000	2,000	3,500
1010027	Odessa	Pasco	SWD	250	1,000,000	1.0	350	2.5	25	1,000	10,000	4,000	4,000
7775424	Tampa	Hillsborough	EPCHC	400	500,000	1.6	350	4.0	25	1,000	5,000	2,000	4,000

Notes:

- At any time, any HMA plant may use one lime storage silo and/or one fiber feeder.
- * Fiber feed rate to drum mixer, ton/hr (Column 7) is 0.4% of allowed HMA production, tons/hr (Column 5).
- ** Estimated Actual Annual Fiber Usage (ton/yr) is shown in Column 8 and Estimated Actual Annual Lime Usage (ton/yr) is shown in Column 11; the actual ton/yr lime or fiber usage for individual plants may be higher than these estimates.
- *** Lime feed rate to drum mix plant, ton/yr (Column 9) is 1% of allowed HMA production, ton/hr (Column 5). PM from the asphalt plant drum mixer is controlled by the main asphalt plant baghouse.
- **** Lime silo loading rate of 25 ton/hr assumed (Column 10). At 25 tons/hr, a 24 ton truckload of lime may be loaded into silo in approximately 1 hr. P/M/PM10 emissions from the silo occur only during lime tanker truck unloading to silo when air is displaced from the silo through its integral dust control baghouse mounted on top of the silo's vent. Emissions from the baghouse are based on 25 ton/hr loading rate to the silo.
- ***** Maximum Annual Lime Usage (Column 12) is Annual Allowed HMA Production (Column 6) X 1.0%. Maximum Annual Fiber Usage (Column 13) is Annual Allowed HMA Production (Column 6) X 0.4%.

Emissions Estimate Calculations by:



Date: 7/25/2012

Southern Environmental Sciences, Inc.

2 Portable Lime Silos and 2 Portable Fiber Feeders for Use at Hot Mix Asphalt (HMA) Plants of Ajax Paving Industries

Client	Ajax Paving Industries of Florida, LLC	Job No. 12P225
Subject	Modification of Air Permit 7775592-001-AC to Exempt 2 Portable Lime silos & 2 Fiber Feeders	7/25/2012
Task	Review Emissions Estimates for Air Permitting Exemptions of 2 Silos & 2 Feeders	Sheet 2 of 2

Hot Mix Asphalt (HMA) Plants - PM Emissions Estimates and Basis of Exemptions from Air Permitting

- >The Nokomis plant has the largest allowable HMA production of the Ajax plants (1,200,000 ton/yr). See Sheet 1 of 2 (Column 6). The other Ajax HMA plants are permitted with lower maximum HMA production per year, with 500,000 ton/yr being the smallest maximum (Tampa, Palmetto, Punta Gorda, and Fort Myers plants). The Odessa plant is permitted for 1,000,000 ton/yr HMA production.
- >Lime Silo Emissions: The lime silos have integral silo vent dust collectors. Therefore the "Controlled" PM emissions estimates below are applicable to the exemption. Based on the PM emissions estimates, each lime silo is exempt from air permitting under DEP Rule 62-210.300(3)(b)1. ("Generic Emissions Unit or Activity Exemptions").
- >Fiber Feeder Emissions: 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. PM emissions from fiber bale loading into the hopper may be conservatively estimated using the same emission factors as used below for the lime silo baghouse PM emissions, and thus 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. Based on this rationale, each fiber feeder is exempt from air permitting under DEP Rule 62-210.300(3)(b)1. ("Generic Emissions Unit or Activity Exemptions").

Ajax - Nokomis HMA Plant - Air Permit No. 1150103-010-AO allows max. 1,200,000 HMA production/12-months.
At Maximum Annual Usage of Lime: 1% X 1,200,000 TPY HMA = 12,000 TPY Lime through a storage silo.

PM Emissions Estimate

Relocatable Equipment	Throughput (ton/yr)	Material	PM Emission Factor, lb/ton*	Uncontrolled or Controlled	PM Emissions (ton/yr)	Lime Silo Loading Rate** (ton/hr)	PM Emissions (lb/hr)
Lime Silo	12,000	lime	0.72	Uncontrolled	4.3	25	18
Lime Silo	12,000	lime	0.00099	Controlled	0.006	25	0.025

PM10 Emissions Estimate

Relocatable Equipment	Throughput ton/yr	Material	PM10 Emission Factor, lb/ton*	Uncontrolled or Controlled	PM10 Emissions (ton/yr)	Lime Silo Loading Rate** (ton/hr)	PM10 Emissions (lb/hr)
Lime Silo	12,000	lime	0.46	Uncontrolled	2.8	25	12
Lime Silo	12,000	lime	0.00034	Controlled	0.002	25	0.009

Ajax - Tampa HMA Plant - Air Permit No. 7775424-006-AO allows max. 500,000 HMA production/12-months.
At Maximum Annual Usage of Lime: 1% X 500,000 TPY HMA = 5,000 TPY Lime through a storage silo

PM Emissions Estimate

Relocatable Equipment	Throughput (ton/yr)	Material	PM Emission Factor, lb/ton*	Uncontrolled or Controlled	PM Emissions (ton/yr)	Lime Silo Loading Rate** (ton/hr)	PM Emissions (lb/hr)
Lime Silo	5,000	lime	0.72	Uncontrolled	1.8	25	18
Lime Silo	5,000	lime	0.00099	Controlled	0.002	25	0.025

PM10 Emissions Estimate

Relocatable Equipment	Throughput ton/yr	Material	PM10 Emission Factor, lb/ton*	Uncontrolled or Controlled	PM10 Emissions (ton/yr)	Lime Silo Loading Rate** (ton/hr)	PM10 Emissions (lb/hr)
Lime Silo	5,000	lime	0.46	Uncontrolled	1.2	25	12
Lime Silo	5,000	lime	0.00034	Controlled	0.001	25	0.009

Notes:

- * Emission factors from AP-42 Table 11.12-2 for PM/PM10 from cement loading to elevated storage silo (pneumatic) 3-05-011-07. AP-42 Section 11.12, "Concrete Batching", US EPA, 6/2006.
- ** Lime silo loading rate of 25 ton/hr assumed. At 25 tons/hr, a 24 ton truckload may be loaded into silo in approximately 1 hr. PM/PM10 emissions from the silo occur only during lime tanker truck unloading to silo when air is displaced from the silo through in integral dust control baghouse mounted on top of the silo's vent. Emissions from the baghouse are based on 25 ton/hr loading rate to the lime storage silo.

Emissions Estimate Calculation by:



Date:

7/25/2012

Attachment B:

- 1. Cross-Reference Table of Emission Unit No. & Permit Nos.**
- 2. Reports of Visible Emissions Observations of Ajax Lime Silo Baghouses:
2009 – 2012
Air Permit No. 7775592-001-AC
(16 pages)**

Ajax Paving Industries of Florida, LLC		
Two (2) Portable Lime Silos (34 ton each)		
EU Cross-Reference Table		
Ajax Silo Identification:	"DEP ID 001"	"DEP ID 002"
Ajax Silo Serial No.:	"Serial No. 2029"	"Serial No. 2011"
DEP Air Permit No./Facility ID No.	EU No.	EU No.
7775592-001-AC* DEP-Tallahassee Issued: August 11, 2009 Expired: July 1, 2011	001* *Initial VE Test Conducted 12/10/2009 at Fort Myers Asphalt Plant: ID No. 7774822	002* *Initial VE Test Conducted 11/24/2009 at Palmetto Asphalt Plant: ID No. 0810063
1010027-010-AO Odessa Asphalt Plant-Pasco Co. DEP-SWD	010	012
0810063-012-AO Palmetto Asphalt Plant-Manatee Co. DEP-SWD	004	006
7775424-006-AO Tampa Asphalt Plant-Hillsborough Co. EPCHC (SWHI)	007	
1150103-008-AO Nokomis Asphalt Plant-Sarasota Co. Sarasota County AQ/STM (SWSA)	006	007
0150028-009-AO Punta Gorda Asphalt Plant-Charlotte Co. DEP-SD	005	
7774822-007-AF Ft. Myers Asphalt Plant-Lee Co. DEP-SD	003	006

Notes:FFY 2011 (10/1/2010 - 9/30/2011):

1. Ajax Silo "DEP ID 001" (Serial No. 2029) was VE tested at Ajax – Tampa Asphalt Plant, Air ID No. 7775424 (EU 007) on 12/1/2010.
2. Ajax Silo "DEP ID 002" (Serial No. 2011) had very low usage, not used since June 2011, and designated Long Term Reserve Standby effective September 15, 2011. Unable to conduct VE test in FFY 2011.

FFY 2012 (10/1/2011 - 9/30/2012):

1. Ajax Silo "DEP ID 001" (Serial No. 2029) was VE tested at Ajax – Tampa Asphalt Plant, Air ID No. 7775424 (EU 007) on 06/20/2012.
2. Ajax Silo "DEP ID 002" (Serial No. 2011) was VE tested at Ajax – Odessa Asphalt Plant, Air ID No. 1010027 (EU 012) on 10/27/2011.

**Reports of Visible Emissions Observations
of Two Portable Lime Silo Baghouses 2009 – 2012
Ajax Paving Industries of Florida, LLC
Air Permit No. 7775592-001-AC**

EU 001 – Portable Lime Silo (Ajax identifiers: “DEP ID 001” & “Serial No. 2029”)

12/10/2009 – Initial VE Test at Ajax – Fort Myers Asphalt Plant – Air Permit ID No. 7774822

12/1/2010 – VE Test at Ajax – Tampa Asphalt Plant – Air Permit ID No. 7775424

6/20/2012 – VE Test at Ajax – Tampa Asphalt Plant – Air Permit ID No. 7775424

EU 002 – Portable Lime Silo (Ajax identifiers: “DEP ID 002” & “Serial No. 2011”)

11/24/2009 – Initial VE Test at Ajax – Palmetto Asphalt Plant – Air Permit ID No. 0810063

FFY 2011: Low usage, not used after June 2011, and designated Long Term Reserve Standby effective September 15, 2011. Therefore no VE Test in FFY 2011.

10/27/2011 - VE Test at Ajax – Odessa Asphalt Plant – Air Permit ID No. 1010027

Southern Environmental Sciences, Inc.

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

December 11, 2009

Mr. Sherrill Culliver
FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION
South District Air Section
P.O. Box 2549
Ft. Myers, Florida 33902-2549

Re: AJAX Paving Industries, Inc.
Portable Lime Silo
Permit ID No.: 7775592-001-AC

Mr. Culliver:

Enclosed is a copy of the visible emissions evaluation performed on the above referenced source on December 10, 2009. Results were well within the allowable limits established by the permit for this source.

Please feel free to call if you have any questions.

Regards,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Kenneth M. Roberts, QEP
Vice President

Enclosures

cc: Mr. Vince Hafeli, AJAX Paving Industries

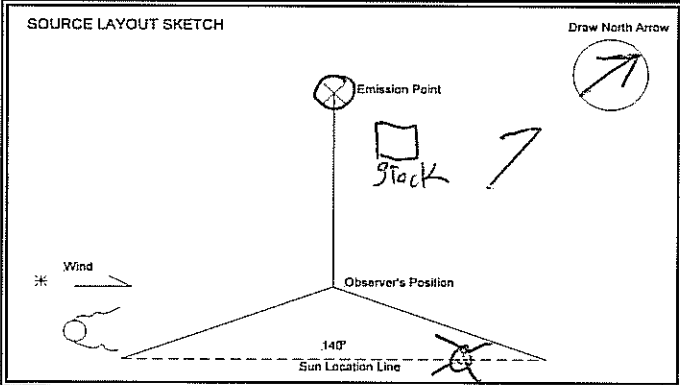
Southern Environmental Sciences, Inc.

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

VISIBLE EMISSIONS EVALUATION

COMPANY AJAX Paving	
UNIT Portable Lime Silo	
ADDRESS 7121 Pennsylvania St. Ft. Myers, FL	
PERMIT NO. 7775592-001-PC	COMPLIANCE? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
AIRS NO. 7775592	EU NO. 001
PROCESS RATE 24 tons loaded	PERMITTED RATE 34 tons
PROCESS EQUIPMENT Portable Lime Silo	
CONTROL EQUIPMENT Baghouse	
OPERATING MODE Filling silo @ 6 PSIG	AMBIENT TEMP. (°F) START 70 STOP 70
HEIGHT ABOVE GROUND LEVEL START 40' STOP same	HEIGHT RELATIVE TO OBSERVER START 70' STOP 40'
DISTANCE FROM OBSERVER START 200' STOP same	DIRECTION FROM OBSERVER START 300° STOP 300°
EMISSION COLOR NONE	PLUME TYPE CONTIN. <input type="checkbox"/> INTERMITTENT <input type="checkbox"/> N/A
WATER DROPLETS PRESENT? NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IS WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/> N/A
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START Baghouse STOP same	
DESCRIBE BACKGROUND START sky STOP sky	
BACKGROUND COLOR START Bl/Wh STOP same	SKY CONDITIONS START Seatt STOP Broken
WIND SPEED (MPH) START 0-10 STOP 5.20	WIND DIRECTION START S STOP SW
AVERAGE OPACITY FOR HIGHEST PERIOD 0%	RANGE OF OPACITY READINGS MIN. 0 MAX. 0

OBSERVATION DATE 12/10/09		START TIME 0725				STOP TIME 0825			
SEC	0	15	30	45	SEC	0	15	30	45
MIN					MIN				
0	0	0	0	0	30	0	0	0	0
1	0	0	0	0	31	0	0	0	0
2	0	0	0	0	32	0	0	0	0
3	0	0	0	0	33	0	0	0	0
4	0	0	0	0	34	0	0	0	0
5	0	0	0	0	35	0	0	0	0
6	0	0	0	0	36	0	0	0	0
7	0	0	0	0	37	0	0	0	0
8	0	0	0	0	38	0	0	0	0
9	0	0	0	0	39	0	0	0	0
10	0	0	0	0	40	0	0	0	0
11	0	0	0	0	41	0	0	0	0
12	0	0	0	0	42	0	0	0	0
13	0	0	0	0	43	0	0	0	0
14	0	0	0	0	44	0	0	0	0
15	0	0	0	0	45	0	0	0	0
16	0	0	0	0	46	0	0	0	0
17	0	0	0	0	47	0	0	0	0
18	0	0	0	0	48	0	0	0	0
19	0	0	0	0	49	0	0	0	0
20	0	0	0	0	50	0	0	0	0
21	0	0	0	0	51	0	0	0	0
22	0	0	0	0	52	0	0	0	0
23	0	0	0	0	53	0	0	0	0
24	0	0	0	0	54	0	0	0	0
25	0	0	0	0	55	0	0	0	0
26	0	0	0	0	56	0	0	0	0
27	0	0	0	0	57	0	0	0	0
28	0	0	0	0	58	0	0	0	0
29	0	0	0	0	59	0	0	0	0



Comments

EASTERN TECHNICAL ASSOCIATES

MARK GIERKE

GIE703763 STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

TAMPA, FL	8/12/2009	375446
SCHOOL LOCATION	DATE OF SCHOOL	CERT NUMBER
TMPS08	2/11/2010	
LAST LECTURE	CERTIFICATION EXP DATE	BEARER

I certify that all data provided to the person conducting the test was true and correct to the best of my knowledge:

Signature: Title

Southern Environmental Sciences, Inc.

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

December 15, 2010

Mr. Jason Waters
ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Roger P. Stewart Center
Air Quality Division
3629 Queen Palm Drive
Tampa, Florida 33619
Email: watersj@epchc.org

Re: AJAX Paving Industries of Florida, Inc.
Tampa Facility
Asphalt Storage Silos, Truck Loadout & Lime Storage Silo
EU ID Nos. 006 & 007
Permit No.: 7775424-005-AC

Mr. Waters:

Enclosed is one (1) copy of each of the four (4) visible emissions evaluations conducted at the above referenced facility on December 1, 2010 and December 15, 2010. A second visible emissions evaluation was conducted on the Asphalt Storage Silos on December 15, 2010 at a higher production rate. Results of the testing were well within the allowable limits.

If you have any questions concerning the reports, please do not hesitate to call.

Regards,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Dale A. Wingler
Environmental Specialist

cc: Mr. Vince Hafeli, AJAX Paving Industries of Florida, Inc. at vhafeli@ajaxpaving.com

Southern Environmental Sciences, Inc.

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

VISIBLE EMISSIONS EVALUATION

COMPANY <i>AJAX Paving Industries</i>	
UNIT <i>Line Silo</i>	
ADDRESS <i>6050 Tower Rd. Tampa, FL</i>	
PERMIT NO. <i>7775424-005-AC</i>	COMPLIANCE? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
AIRS NO. <i>7775424</i>	EU NO. <i>007</i>
PROCESS RATE <i>NA</i>	PERMITTED RATE <i>NA</i>
PROCESS EQUIPMENT <i>Line Silo</i>	
CONTROL EQUIPMENT <i>Dust Collector</i>	
OPERATING MODE <i>Filling Silo</i>	AMBIENT TEMP. (°F) START <i>67</i> STOP <i>65</i>
HEIGHT ABOVE GROUND LEVEL START <i>150'</i> STOP <i>Same</i>	HEIGHT RELATIVE TO OBSERVER START <i>150'</i> STOP <i>Same</i>
DISTANCE FROM OBSERVER START <i>140'</i> STOP <i>Same</i>	DIRECTION FROM OBSERVER START <i>300</i> STOP <i>Same</i>
EMISSION COLOR <i>None</i>	PLUME TYPE CONTIN. <input type="checkbox"/> INTERMITTENT <input type="checkbox"/> <i>NA</i>
WATER DROPLETS PRESENT? NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IS WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/> <i>NA</i>
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START <i>Dust Collector Vent</i> STOP <i>Same</i>	
DESCRIBE BACKGROUND START <i>SKY</i> STOP <i>Same</i>	
BACKGROUND COLOR START <i>Gray</i> STOP <i>Same</i>	SKY CONDITIONS START <i>Overcast</i> STOP <i>Same</i>
WIND SPEED (MPH) START <i>8-18</i> STOP <i>Same</i>	WIND DIRECTION START <i>N</i> STOP <i>Same</i>
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0%</i>	RANGE OF OPACITY READINGS MIN. <i>0%</i> MAX. <i>0%</i>

OBSERVATION DATE		START TIME				STOP TIME			
<i>12/1/10</i>		<i>0825</i>				<i>0835</i>			
MIN	SEC				MIN	SEC			
	0	15	30	45		0	15	30	45
0	0	0	0	0	30				
1	0	0	0	0	31				
2	0	0	0	0	32				
3	0	0	0	0	33				
4	0	0	0	0	34				
5	0	0	0	0	35				
6	0	0	0	0	36				
7	0	0	0	0	37				
8	0	0	0	0	38				
9	0	0	0	0	39				
10	0	0	0	0	40				
11	0	0	0	0	41				
12	0	0	0	0	42				
13	0	0	0	0	43				
14	0	0	0	0	44				
15	0	0	0	0	45				
16	0	0	0	0	46				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
23	0	0	0	0	53				
24	0	0	0	0	54				
25	0	0	0	0	55				
26	0	0	0	0	56				
27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				

AEROMET ENGINEERING INC. CERTIFIES THAT

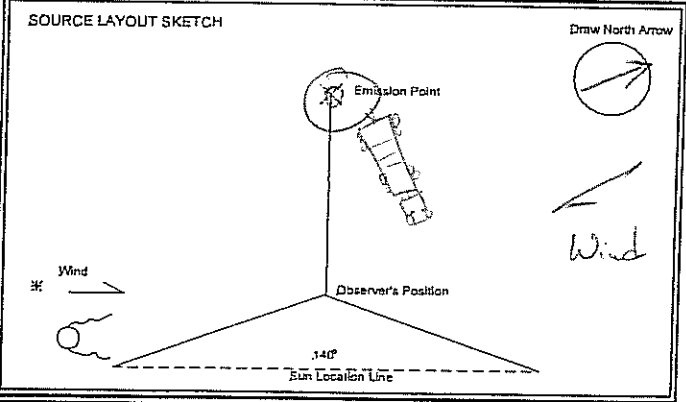
Dale Wingler

has qualified as a CERTIFIED VISIBLE EMISSIONS READER per Title 40 Part 60 Appendix A USEPA Method 9

Issued: 8/3/10 Expires: 2/3/11



Questions? Call 573.636.6393



Comments *No Sun Angle Overcast*

I certify that all data provided to the person conducting the test was true and correct to the best of my knowledge:

Signature:  Title *Plant Foreman*

Southern Environmental Sciences, Inc.

1204 North Wheeler Street □ Plant City, Florida 33566-2354 □ (813) 752-5014, Fax (813) 752-2475.

November 3, 2010

Mr. Jason Waters
ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Air Quality Division
3629 Queen Palm Drive
Tampa, Florida 33605
via email: watersj@epchc.org

Re: AJAX Paving Industries of Florida, Inc.
Tampa Facility
Asphalt Storage Silos, Truck Loadout & Lime Storage Silo
EU ID Nos. 006 & 007
Permit No.: 7775424-005-AC

Dear Mr. Waters:

This is to notify your office that Southern Environmental Sciences, Inc. is scheduled to perform visible emissions evaluations of the above referenced facility on December 1, 2010 beginning at approximately 8:00 A.M.

Testing will be performed in accordance with EPA Method 9 for determination of compliance status. I, mgierke@sesfla.com, will be the contact person for this testing. The following sources will be tested:

EU ID No. 006: Asphalt Storage Silos (EP 02)
EU ID No. 006: Truck Loadout Scale Station (EP 03)
EU ID No. 007: Lime Storage Silo

If any changes in scheduling become necessary, your office will be notified prior to the testing.

Very truly yours,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.

Mark Gierke
Mark Gierke, QSTI
Source Testing Manager

cc: Mr. Vince Hafeli, AJAX Paving Industries of Florida, Inc. (via email)

Southern Environmental Sciences, Inc.

1204 North Wheeler Street □ Plant City, Florida 33563 □ (813) 752-5014 □ Fax: (813) 752-2475
www.sesfla.com

June 22, 2012

Submitted by email only

Mr. Jason Waters
ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Air Quality Division
3629 Queen Palm Drive
Tampa, Florida 33605
Submitted via email: waters@epchc.org

Re: VE Test Report: Portable Lime Storage Silo – Ajax "ID EU 001" (Serial No. 2029)
EU No. 007 under Air Permit No. 7775425-006-AC
Site Name: Tampa Asphalt Plant, Hillsborough County
Owner/Company: Ajax Paving Industries of Florida, LLC

Dear Mr. Waters:

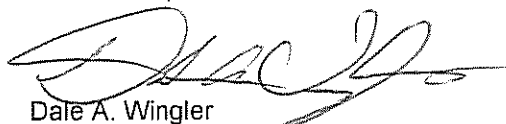
On behalf of Ajax Paving Industries of Florida, LLC (Ajax), Southern Environmental Sciences, Inc. (SES) submits the attached copy of the visible emissions (VE) evaluation performed on the above referenced source on June 20, 2012. This submission is to provide additional information to the letter submitted to your office on June 20, 2012. This lime silo was also designated EU 001 under statewide Air Construction Permit No. 7775592-001-AC. The attached updated EU Cross-Reference Table (6/21/2012) for the two (2) Ajax Portable Lime Silos is provided for your reference. The results of the testing were well within the allowable limits established by the permits for this emission unit.

This is the FFY 2012 VE test for this lime storage silo.

Please contact me at phone (813) 752-5014 if you have any questions.

Sincerely,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Dale A. Wingler
Environmental Specialist

ec: Ms. Danielle Henry, DEP-SW at Danielle.D.Henry@dep.state.fl.us
Ms. Susan Cameron, Sarasota County at scameron@scgov.net
Mr. Sherrill Culliver, DEP-SD at Sherrill.Culliver@dep.state.fl.us
Mr. Vince Hafeli, V.P., Ajax at vhafeli@ajaxpaving.com
Mr. Mickey Cox, Ajax at mcox@ajaxpaving.com
Mr. Hector Arroyo, Ajax at harroyo@ajaxpaving.com
Mr. Mark Gierke, SES Source Testing Manager at mgierke@sesfla.com
Ms. Cindy Benning, SES Testing Coordinator at cbenning@sesfla.com

Southern Environmental Sciences, Inc.

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

VISIBLE EMISSIONS EVALUATION

COMPANY <i>AJAX Paving Industries</i>	
UNIT <i>Line S.I.b</i>	
ADDRESS <i>6050 Tanson Rd.</i>	
<i>Tampa, FL 33619</i>	
PERMIT NO. <i>7775424-006-A0</i>	COMPLIANCE YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
AIRS NO. <i>7775424</i>	EU NO. <i>007</i>
PROCESS RATE <i>NA</i>	PERMITTED RATE <i>NA</i>
PROCESS EQUIPMENT <i>Line S.I.b</i>	
CONTROL EQUIPMENT <i>Dust Collector</i>	
OPERATING MODE <i>Fill S.I.b @ ~ 6 PSIG</i>	AMBIENT TEMP (°F) START <i>78</i> STOP <i>79</i>
HEIGHT ABOVE GROUND LEVEL START <i>~50'</i> STOP <i>Same</i>	HEIGHT RELATIVE TO OBSERVER START <i>~50'</i> STOP <i>Same</i>
DISTANCE FROM OBSERVER START <i>~150'</i> STOP <i>Same</i>	DIRECTION FROM OBSERVER START <i>300</i> STOP <i>Same</i>
EMISSION COLOR <i>None</i>	PLUME TYPE CONTIN. <input type="checkbox"/> INTERMITTENT <input type="checkbox"/> <i>NA</i>
WATER DROPLETS PRESENT? NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IS WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/> <i>NA</i>
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START <i>Dust Collector Vent</i> STOP <i>Same</i>	
DESCRIBE BACKGROUND START <i>Sk</i> STOP <i>Same</i>	
BACKGROUND COLOR START <i>Gray</i> STOP <i>Same</i>	SKY CONDITIONS START <i>Overcast</i> STOP <i>Same</i>
WIND SPEED (MPH) START <i>6-12</i> STOP <i>Same</i>	WIND DIRECTION START <i>NE</i> STOP <i>Same</i>
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0%</i>	RANGE OF OPACITY READINGS MIN. <i>0%</i> MAX. <i>0%</i>
SOURCE LAYOUT SKETCH <div style="text-align: right;">Draw North Arrow</div>	
COMMENTS <i>No. Sun Angle - Overcast</i>	
<i>AJAX S.I.b ID "DEP ID 001"</i>	

OBSERVATION DATE		START TIME				STOP TIME					
<i>6/20/12</i>		<i>0801</i>				<i>0855</i>					
SEC	MIN	0	15	30	45	SEC	MIN	0	15	30	45
0	0	0	0	0	0	30	0	0	0	0	0
1	0	0	0	0	0	31	0	0	0	0	0
2	0	0	0	0	0	32	0	0	0	0	0
3	0	0	0	0	0	33	0	0	0	0	0
4	0	0	0	0	0	34	0	0	0	0	0
5	0	0	0	0	0	35	0	0	0	0	0
6	0	0	0	0	0	36	0	0	0	0	0
7	0	0	0	0	0	37	0	0	0	0	0
8	0	0	0	0	0	38	0	0	0	0	0
9	0	0	0	0	0	39	0	0	0	0	0
10	0	0	0	0	0	40	0	0	0	0	0
11	0	0	0	0	0	41	0	0	0	0	0
12	0	0	0	0	0	42	0	0	0	0	0
13	0	0	0	0	0	43	0	0	0	0	0
14	0	0	0	0	0	44	0	0	0	0	0
15	0	0	0	0	0	45	0	0	0	0	0
16	0	0	0	0	0	46	0	0	0	0	0
17	0	0	0	0	0	47	0	0	0	0	0
18	0	0	0	0	0	48	0	0	0	0	0
19	0	0	0	0	0	49	0	0	0	0	0
20	0	0	0	0	0	50	0	0	0	0	0
21	0	0	0	0	0	51	0	0	0	0	0
22	0	0	0	0	0	52	0	0	0	0	0
23	0	0	0	0	0	53	0	0	0	0	0
24	0	0	0	0	0	54	0	0	0	0	End of
25	0	0	0	0	0	55					Lead
26	0	0	0	0	0	56					(D)
27	0	0	0	0	0	57					
28	0	0	0	0	0	58					
29	0	0	0	0	0	59					

AEROMET ENGINEERING INC. CERTIFIES THAT
Dale Wingler
has qualified as a CERTIFIED VISIBLE EMISSIONS READER
per Title 40 Part 60 Appendix A USEPA Method 9
 Issued: 1/31/12 Expires: 7/31/12
Dale Wingler
 Questions? Call 573.636.6393

I certify that all data provided to the person conducting the test was true and correct to the best of my knowledge:

Signature: *R. J. ...* Title: *Plant Superintendent*

Ajax Paving Industries of Florida, LLC		
Two (2) Portable Lime Silos (34 ton each)		
EU Cross-Reference Table		
Ajax Silo Identification	DEP ID 001	DEP ID 002
Ajax Silo Serial No.	Serial No. 2029	Serial No. 2011
Air Permit/Facility ID No.	EU No.	EU No.
7775592-001-AC* DEP-Tallahassee	001*	002*
*Initial VE Test	12/10/2009 at Ft. Myers Asphalt Plant 7774822	11/24/2009 at Palmetto Asphalt Plant 0810063
1010027-010-AO Odessa Asphalt Plant-Pasco Co. DEP-SWD	010	012
0810063-012-AO Palmetto Asphalt Plant-Manatee Co. DEP-SWD	004	006
7775424-006-AO Tampa Asphalt Plant-Hillsborough Co. EPCHC (SWHI)	007	
1150103-008-AO Nokomis Asphalt Plant-Sarasota Co. Sarasota County AQ/STM (SWSA)	006	007
0150028-009-AO Punta Gorda Asphalt Plant-Charlotte Co. DEP-SD	005	
7774822-007-AF Ft. Myers Asphalt Plant-Lee Co. DEP-SD	003	006

Notes:FFY 2011 (10/1/2010 - 9/30/2011):

1. Ajax Silo "DEP ID 001" (Serial No. 2029) was VE tested at Ajax – Tampa Asphalt Plant, Air ID No. 7775424 (EU 007) on 12/1/2010.
2. Ajax Silo "DEP ID 002" (Serial No. 2011) had very low usage, not used since June 2011, and designated Long Term Reserve Standby effective September 15, 2011. Unable to conduct VE test in FFY 2011.

FFY 2012 (10/1/2011 - 9/30/2012):

1. Ajax Silo "DEP ID 002" (Serial No. 2011) was VE tested at Ajax – Odessa Asphalt Plant, Air ID No. 1010027 (EU 012) on 10/27/2011.
2. Ajax Silo "DEP ID 001" (Serial No. 2029) was VE tested at Ajax – Tampa Asphalt Plant, Air ID No. 7775424 (EU 007) on 06/20/2012.

Southern Environmental Sciences, Inc.

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

December 15, 2009

Ms. Danielle Henry
Environmental Compliance Manager
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Air Section
13051 N Telecom Parkway
Temple Terrace, Florida 33637-0926

Re: AJAX Paving Industries of Florida, LLC
Portable Lime Storage Silo, Emissions Unit 002
FDEP Permit No.: 7775592-001-AC

Dear Ms. Henry:

Enclosed is a copy of the visible emissions evaluation performed on the above referenced source on November 24, 2009 while it was located at the AJAX No. 3 Asphalt Plant in Palmetto, Florida (Airs ID: 0710063). A copy of the evaluation is also included in the asphalt plant emissions test report for the test that was conducted on the same day. Mr. James Burkholder of your office was present as an observer during the evaluation. Results of the testing were well within the allowable limits established by the permit for this source.

Please feel free to call if you have any questions concerning the results.

Sincerely,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Kenneth M. Roberts, QEP
Vice President

Enclosures

cc: Mr. Vince Hafeli, AJAX Paving Industries of Florida, LLC

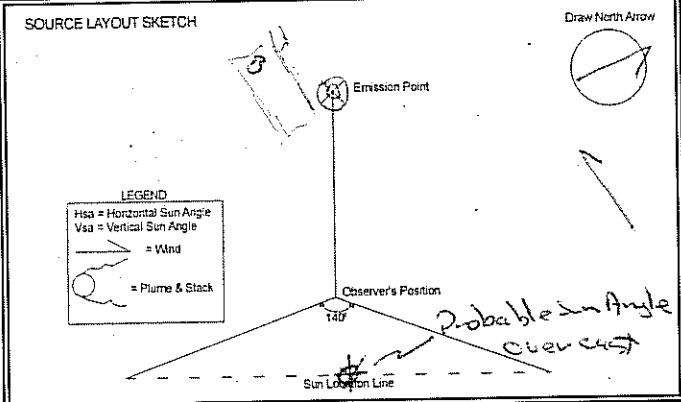
Southern Environmental Sciences, Inc.

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

VISIBLE EMISSIONS EVALUATION

COMPANY <i>AJAX Paving Industries</i>	
UNIT <i>Lime Silo</i>	
ADDRESS <i>12165 U.S. 41 South Palmetto, FL</i>	
PERMIT NO. <i>07775592-001-R</i>	COMPLIANCE? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
AIRS NO. <i>7775592</i>	EU NO. <i>002</i>
PROCESS RATE <i>24.2 TPH</i>	PERMITTED RATE <i>—</i>
PROCESS EQUIPMENT <i>Storage Silo</i>	
CONTROL EQUIPMENT <i>Filter Collector</i>	
OPERATING MODE <i>Load 3PSI</i>	AMBIENT TEMP. (°F) START <i>68°</i> STOP
HEIGHT ABOVE GROUND LEVEL START <i>230'</i> STOP <input checked="" type="checkbox"/>	HEIGHT RELATIVE TO OBSERVER START <i>230'</i> STOP <input checked="" type="checkbox"/>
DISTANCE FROM OBSERVER START <i>2100'</i> STOP <input checked="" type="checkbox"/>	DIRECTION FROM OBSERVER START <i>287°</i> STOP <input checked="" type="checkbox"/>
EMISSION COLOR <i>None</i>	PLUME TYPE CONTIN. <input type="checkbox"/> INTERMITTENT <input type="checkbox"/>
WATER DROPLETS PRESENT? NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IS WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input checked="" type="checkbox"/>
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START <i>Filter Vent</i> STOP <input checked="" type="checkbox"/>	
DESCRIBE BACKGROUND START <i>Sky</i> STOP <input checked="" type="checkbox"/>	
BACKGROUND COLOR START <i>Green</i> STOP <input checked="" type="checkbox"/>	SKY CONDITIONS START <i>Overcast</i> STOP <input checked="" type="checkbox"/>
WIND SPEED (MPH) START <i>2-4</i> STOP	WIND DIRECTION START <i>ENE</i> STOP <i>ENE</i>
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0%</i>	RANGE OF OPACITY READINGS MIN. <i>0%</i> MAX. <i>0%</i>

OBSERVATION DATE <i>11/24/09</i>		START TIME <i>0742</i>		STOP TIME <i>0812</i>					
SEC	0	15	30	45	SEC	0	15	30	45
MIN					MIN				
0	0	0	0	0	30				
1	0	0	0	0	31				
2	0	0	0	0	32				
3	0	0	0	0	33				
4	0	0	0	0	34				
5	0	0	0	0	35				
6	0	0	0	0	36				
7	0	0	0	0	37				
8	0	0	0	0	38				
9	0	0	0	0	39				
10	0	0	0	0	40				
11	0	0	0	0	41				
12	0	0	0	0	42				
13	0	0	0	0	43				
14	0	0	0	0	44				
15	0	0	0	0	45				
16	0	0	0	0	46				
17	0	0	0	0	47				
18	0	0	0	0	48				
19	0	0	0	0	49				
20	0	0	0	0	50				
21	0	0	0	0	51				
22	0	0	0	0	52				
23	0	0	0	0	53				
24	0	0	0	0	54				
25	0	0	0	0	55				
26	0	0	0	0	56				
27	0	0	0	0	57				
28	0	0	0	0	58				
29	0	0	0	0	59				



Comments

EASTERN TECHNICAL ASSOCIATES

KENNETH M ROBERTS

ROB420592 STUDENT ID NUMBER

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

TAMPA, FL 8/12/2009 375445

SCHOOL LOCATION DATE OF SCHOOL CERT NUMBER

TMPF07 2/11/2010 *Ken Roberts*

LAST LECTURE CERTIFICATION EXP. DATE BEARER

I certify that all data provided to the person conducting the test was true and correct to the best of my knowledge:

Signature: *[Signature]* Title

[Signature] FDEP

Southern Environmental Sciences, Inc.

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

November 8, 2011

Submitted by email only

Ms. Danielle Henry
Environmental Compliance Manager
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
Southwest District Air Section
13051 N Telecom Parkway
Temple Terrace, Florida 33637-0926
Submitted via email: Danielle.D.Henry@dep.state.fl.us

Re: VE Test Report: Portable Lime Storage Silo – Ajax "ID EU 002" (Serial No. 2011)
EU No. 012 under Air Permit No. 1010027-010-AO
Site Name: Odessa Asphalt Plant, Odessa, Pasco County
Owner/Company: Ajax Paving Industries of Florida, LLC

Dear Ms. Henry:

On behalf of Ajax Paving Industries of Florida, LLC (Ajax), Southern Environmental Sciences, Inc. (SES) submits the attached copy of the visible emissions (VE) evaluation performed on the above referenced source on October 27, 2011. This lime silo was also designated EU 002 under statewide Air Construction Permit No. 7775592-001-AC. The attached updated EU Cross-Reference Table (11/7/2011) for the two (2) Ajax Portable Lime Silos is provided for your reference. The results of the testing were well within the allowable limits established by the permits for this emission unit.

This is the FFY 2012 VE test for this lime storage silo. As described in previous email correspondence, Ajax was unable to perform a VE test for this portable lime silo during federal fiscal year (FFY) 2011 (10/1/2010 - 9/30/2011) due to extended inactivity.

Please contact me at phone (813) 752-5014 if you have any questions.

Sincerely,

SOUTHERN ENVIRONMENTAL
SCIENCES, INC.



Lynn Robinson, P.E.
Permitting Manager

cc: Mr. Mr. Jason Waters, EPCHC at watersj@epchc.org
Ms. Susan Cameron, Sarasota County at scameron@scgov.net
Mr. Sherrill Culliver, DEP-SD at Sherrill.Culliver@dep.state.fl.us
Mr. Vince Hafeli, V.P., Ajax at vhafeli@ajaxpaving.com
Mr. Mickey Cox, Ajax at mcox@ajaxpaving.com
Mr. Hector Arroyo, Ajax at harroyo@ajaxpaving.com
Mr. Mark Gierke, SES Source Testing Manager at mgierke@sesfla.com
Ms. Cindy Benning, SES Testing Coordinator at cbenning@sesfla.com

Ajax Paving Industries of Florida, LLC		
Two (2) Portable Lime Silos (34 ton each)		
EU Cross-Reference Table		
Ajax Silo Identification	DEP ID 001	DEP ID 002
Ajax Silo Serial No.	Serial No. 2029	Serial No. 2011
Air Permit/Facility ID No.	EU No.	EU No.
7775592-001-AC* DEP-Tallahassee	001*	002*
*Initial VE Test	12/10/2009 at Ft. Myers Asphalt Plant 7774822	11/24/2009 at Palmetto Asphalt Plant 0810063
1010027 Odessa Asphalt Plant-Pasco Co. DEP-SWD	010	012
0810063 Palmetto Asphalt Plant-Manatee Co. DEP-SWD	004	006
7775424 Tampa Asphalt Plant-Hillsborough Co. EPCHC (SWHI)	007	
1150103 Nokomis Asphalt Plant-Sarasota Co. Sarasota County AQ/STM (SWSA)	006	007
0150028 Punta Gorda Asphalt Plant-Charlotte Co. DEP-SD	005	
7774822 Ft. Myers Asphalt Plant-Lee Co. DEP-SD	003	006

Notes:**FFY 2011 (10/1/2010 - 9/30/2011):**

1. Ajax Silo "DEP ID 001" (Serial No. 2029) was VE tested at Ajax – Tampa Asphalt Plant, Air ID No. 7775424 (EU 007) on 12/1/2010.
2. Ajax Silo "DEP ID 002" (Serial No. 2011) had very low usage, not used since June 2011, and designated Long Term Reserve Standby effective September 15, 2011. Unable to conduct VE test in FFY 2011.

FFY 2012 (10/1/2011 - 9/30/2012):

1. Ajax Silo "DEP ID 002" (Serial No. 2011) was VE tested at Ajax – Odessa Asphalt Plant, Air ID No. 1010027 (EU 012) on 10/27/2011.

Southern Environmental Sciences, Inc.

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

VISIBLE EMISSIONS EVALUATION

Page 1 of 2

COMPANY <i>Ajax Paving Industries of Florida</i>	
UNIT <i>Odessa Asphalt Plant - Lime Silo</i>	
ADDRESS <i>11603 State Rd 54 Odessa, FL 33556 (Pasco County)</i>	
PERMIT NO. <i>1010027-010-AD</i>	COMPLIANCE YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
AIRS NO. <i>1010027</i>	EU NO. <i>012</i>
PROCESS RATE <i>X</i>	PERMITTED RATE <i>N/A</i>
PROCESS EQUIPMENT <i>Lime Storage Silo "DEP ID 002"</i>	
CONTROL EQUIPMENT <i>Vent Filter Baghouse</i>	
OPERATING MODE <i>loading silo @ 7 psi</i>	AMBIENT TEMP (°F) START <i>~75</i> STOP <i>~78</i>
HEIGHT ABOVE GROUND LEVEL START <i>~30'</i> STOP <i>same</i>	HEIGHT RELATIVE TO OBSERVER START <i>~25'</i> STOP <i>same</i>
DISTANCE FROM OBSERVER START <i>~100'</i> STOP <i>same</i>	DIRECTION FROM OBSERVER START <i>~318°</i> STOP <i>same</i>
EMISSION COLOR <i>None</i>	PLUME TYPE CONTIN. <input type="checkbox"/> INTERMITTENT <input type="checkbox"/> <i>N/A</i>
WATER DROPLETS PRESENT? NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IS WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/> <i>N/A</i>
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START <i>Baghouse Vent</i> STOP <i>same</i>	
DESCRIBE BACKGROUND START <i>sky</i> STOP <i>same</i>	
BACKGROUND COLOR START <i>blue</i> STOP <i>same</i>	SKY CONDITIONS START <i>scattered</i> STOP <i>same</i>
WIND SPEED (MPH) START <i>~5-10</i> STOP <i>same</i>	WIND DIRECTION START <i>SSW</i> STOP <i>same</i>
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0%</i>	RANGE OF OPACITY READINGS MIN. <i>0%</i> MAX. <i>0%</i>
SOURCE LAYOUT SKETCH <div style="text-align: center;"> <p style="text-align: center;">Lime Silo Emission Point</p> <p style="text-align: center;">Observer's Position</p> <p style="text-align: center;">140° Sun Location Line</p> </div>	
COMMENTS <i>Silo 3 Ajax Serial No. 2011 Reference also: 7775592-001-AC EU002 * 22.9 tons lime loaded;</i>	

OBSERVATION DATE		START TIME				STOP TIME					
<i>10/27/2011</i>		<i>12:48pm</i>				<i>See p. 2 of 2</i>					
SEC	MIN	0	15	30	45	SEC	MIN	0	15	30	45
0	30	0	0	0	0	30	0	0	0	0	0
1	31	0	0	0	0	31	0	0	0	0	0
2	32	0	0	0	0	32	0	0	0	0	0
3	33	0	0	0	0	33	0	0	0	0	0
4	34	0	0	0	0	34	0	0	0	0	0
5	35	0	0	0	0	35	0	0	0	0	0
6	36	0	0	0	0	36	0	0	0	0	0
7	37	0	0	0	0	37	0	0	0	0	0
8	38	0	0	0	0	38	0	0	0	0	0
9	39	0	0	0	0	39	0	0	0	0	0
10	40	0	0	0	0	40	0	0	0	0	0
11	41	0	0	0	0	41	0	0	0	0	0
12	42	0	0	0	0	42	0	0	0	0	0
13	43	0	0	0	0	43	0	0	0	0	0
14	44	0	0	0	0	44	0	0	0	0	0
15	45	0	0	0	0	45	0	0	0	0	0
16	46	0	0	0	0	46	0	0	0	0	0
17	47	0	0	0	0	47	0	0	0	0	0
18	48	0	0	0	0	48	0	0	0	0	0
19	49	0	0	0	0	49	0	0	0	0	0
20	50	0	0	0	0	50	0	0	0	0	0
21	51	0	0	0	0	51	0	0	0	0	0
22	52	0	0	0	0	52	0	0	0	0	0
23	53	0	0	0	0	53	0	0	0	0	0
24	54	0	0	0	0	54	0	0	0	0	0
25	55	0	0	0	0	55	0	0	0	0	0
26	56	0	0	0	0	56	0	0	0	0	0
27	57	0	0	0	0	57	0	0	0	0	0
28	58	0	0	0	0	58	0	0	0	0	0
29	59	0	0	0	0	59	0	0	0	0	0

VISIBLE EMISSIONS EVALUATOR

Lynn Robinson

This is To Certify That The Above Named Observer Has Met The Specification Of Federal Reference Method 9 And Qualifies As A Visible Emissions Evaluator Certification Test Conducted By Eastern Technical Associates Of Raleigh, N.C.

ROB449028	396701
Student ID Number	Certificate Number
8/10/2011	2/9/2012
Certification Date	Certification Expiration Date
TAMPA, FL	TMPF09
Location	Last Lecture

Lynn Robinson

I certify that all data provided to the person conducting the test was true and correct to the best of my knowledge:

Signature: _____

Title: *Plant operator*

Southern Environmental Sciences, Inc.

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

VISIBLE EMISSIONS EVALUATION

Page 2 of 2

COMPANY <i>Ajax Industries of Florida</i>	
UNIT <i>Odessa Asphalt Plant - Silo</i> <i>Line</i>	
ADDRESS <i>11603 State Rd. 54</i>	
<i>Odessa, FL 33556 (Pasco County)</i>	
PERMIT NO. <i>1010027-010-A0</i>	COMPLIANCE YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
AIRS NO. <i>1010027</i>	EU NO. <i>012</i>
PROCESS RATE <i>**</i>	PERMITTED RATE <i>N/A</i>
PROCESS EQUIPMENT <i>Lime Storage Silo "DEPID 002"</i>	
CONTROL EQUIPMENT <i>Vent Filter Baghouse</i>	
OPERATING MODE <i>Loading Silo @ 7psi</i>	AMBIENT TEMP (°F) START <i>~78</i> STOP <i>same</i>
HEIGHT ABOVE GROUND LEVEL START <i>~30'</i> STOP <i>same</i>	HEIGHT RELATIVE TO OBSERVER START <i>~25'</i> STOP <i>same</i>
DISTANCE FROM OBSERVER START <i>~100'</i> STOP <i>same</i>	DIRECTION FROM OBSERVER START <i>~318°</i> STOP <i>same</i>
EMISSION COLOR <i>None</i>	PLUME TYPE CONTIN. <input type="checkbox"/> INTERMITTENT <input type="checkbox"/> <i>N/A</i>
WATER DROPLETS PRESENT? NO <input checked="" type="checkbox"/> YES <input type="checkbox"/>	IS WATER DROPLET PLUME ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/> <i>N/A</i>
POINT IN PLUME AT WHICH OPACITY WAS DETERMINED START <i>Baghouse Vent</i> STOP <i>same</i>	
DESCRIBE BACKGROUND START <i>sky</i> STOP <i>same</i>	
BACKGROUND COLOR START <i>blue</i> STOP <i>same</i>	SKY CONDITIONS START <i>scattered</i> STOP <i>same</i>
WIND SPEED (MPH) START <i>~5-10</i> STOP <i>same</i>	WIND DIRECTION START <i>~SSW</i> STOP <i>same</i>
AVERAGE OPACITY FOR HIGHEST PERIOD <i>0%</i>	RANGE OF OPACITY READINGS MIN. <i>0%</i> MAX. <i>0%</i>
SOURCE LAYOUT SKETCH <div style="text-align: center;"> </div>	
COMMENTS <i>* End of loading to Silo.</i>	
<i>** 22.9 tons lime loaded.</i>	
<i>Silo: Ajax Serial No. 2011</i>	
<i>Reference also: 7775592-001-AC EU002.</i>	

OBSERVATION DATE		START TIME				STOP TIME					
<i>10/27/2011</i>		<i>see p. 1 of 2</i>				<i>1:50 pm</i>					
SEC	MIN	0	15	30	45	SEC	MIN	0	15	30	45
0		0	0	0	0	30					
1		0	0	0	0	31					
2						32					
3						33					
4						34					
5						35					
6						36					
7						37					
8						38					
9						39					
10						40					
11						41					
12						42					
13						43					
14						44					
15						45					
16						46					
17						47					
18						48					
19						49					
20						50					
21						51					
22						52					
23						53					
24						54					
25						55					
26						56					
27						57					
28						58					
29						59					

VISIBLE EMISSIONS EVALUATOR

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I certify that all data provided to the person conducting the test was true and correct to the best of my knowledge:

Signature: *[Signature]* Title: *Plant operator*

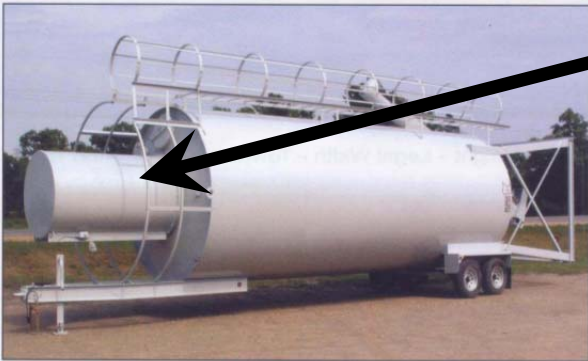
Attachment C:

**Manufacturer Information on Integral Baghouse on Portable Storage Silo
(Belgrade Steel Tank Company, Inc.)
Air Permit No. 7775592-001-AC
(1 page)**

Belgrade Steel Tank Company, Inc.
Examples of portable storage silo with integral silo vent baghouse.



Portable Cement Silo



350 Barrel Portable Silo

- 8'6" Dia. x 37' Height - 350 Brl.
- Positive Fixed Drive
- 12" Screw
- 10 HP Motor And Gear Box Drive
- Heavy Duty Dual Axle Trailer and Tires
- Electric Brakes and Light Packages
- Available with 225 Sq. Ft. Dust House Vibrator
- Trailer Jack
- WL 10,000#
- Bin Level Indicators

Baghouse is located on top of silo to control dust in air vented from silo. Air is only displaced and vented when material is loaded into the silo pneumatically from a tanker truck (e.g. lime, cement).