TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

P & S Paving, Inc.
3701 Olsen Drive
Daytona Beach, FL

Daytona Beach Asphalt Plant

Facility ID No. 1270172

PROJECT

Project No. 1270172-006-AF
Application for Synthetic Minor Source Air Operation Permit
Project Name: Renewal and Revision

COUNTY

Volusia County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Central District Office
3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767

May 4, 2012 and June 11, 2012

Prepared by Jeff Rustin, P.E.

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.

I. <u>Project Description:</u>

A. Applicant:

Mr. Tim Phillips, President
P & S Paving, Inc.
3701 Olsen Drive
Daytona Beach, FL 32124

B. Professional Engineer:

Mr. Lynn Robinson, P.E., Permitting Manager
Southern Environmental Services, Inc.
1204 N. Wheeler Street
Plant City, FL 33

C. Project Location:

Daytona Beach Asphalt Plant
3701 Olsen Drive
Daytona Beach, FL 32124

D. Project Summary:

Renews and Revises Permit No. 1270172-004-AO and incorporates conditions from Air Construction Permit No. 1270172-005-AC (add natural gas as a fuel).

E. Application Information:

Application Received and Complete: 03/30/2012

II. Rule Applicability

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	Y/N	Comments
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	Facility is not a PSD major source.
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Heating, drying, and mixing aggregate could be a source of unconfined particulate matter emissions.
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	Drying operations are a source of VOC and odors.
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	Y	There is no applicable source category.
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Volusia County is an attainment area for ozone.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	EU No. 001 is subject to 40 CFR 60, Subpart A and 40 CFR 60, Subpart I. EU No. 002 is subject to 40 CFR 60, Subpart A and 40 CFR 60, Subpart OOO.

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	There is no applicable source category.
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	N	There is no applicable source category.
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	Facility is a synthetic non-Title V source.
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE and PM testing required for EU No. 001. VE testing required for EU No. 002.

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)		Allowable Emissions (tpy)
		Fuel Oil	Natural Gas	
PM	001-Drum Mix Asphalt Plant with Dry Cyclone and Baghouse	8.50	11.6	**.04 gr/dscf NSPS Limit** (equivalent to 11.6 tpy*)
VOC		8.32	8.0	
NOx		14.3	6.5	
SO2		96.0	0.85	**Sulfur Limit 1.0 percent by weight**
CO		33.8	32.5	
Total HAP		2.6	1.3	
VE				**20 percent**
VE	002-Rock and RAP Crushing System			**10 percent (with capture system) or 15 percent (without capture system)**

**PM allowable calculation based on 0.04 gr/dscf NSPS limit and a baghouse efficiency of 99.9 percent, then used with production limit of 500,000 tpy and operating capacity of 250 tph.*

V. Federal NSPS and/or NESHAP Provisions

A. NSPS 40 CFR Part 60, Subpart A - General Provisions
B. NSPS 40 CFR Part 60, Subpart I – Hot Mix Asphalt Facilities
C. NSPS 40 CFR Part 60, Subpart OOO – Nonmetallic Mineral Processing Plants

VI. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VII. Preliminary Determination

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. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Central District, 3319 Maguire Blvd., Ste. 232, Orlando, FL 32803-3767.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).