Florida Department of Environmental Protection

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Orlando, Florida 32803-3767

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Secretary

Electronically Sent- Received Receipt Requested

FINAL PERMIT

PERMITTEE

P & S Paving, Inc.
3701 Olsen Drive
Daytona Beach, FL 32124

Authorized Representative:
Mr. Tim Phillips, President

Air Permit No. 1270172-006-AF
Permit Expires: 06/30/2017
Site Name: Daytona Beach Asphalt Plant
Synthetic Minor Source
Federally Enforceable State Operation Permit
Project Name: Renewal and Revision

This is the final Federally Enforceable State Operation Permit, which authorizes operation of the Drum Mix Asphalt Plant; and the Rock and RAP Crushing System. The Daytona Beach Asphalt Plant (Standard Industrial Classification No. 2951) is located in Volusia County at 3701 Olsen Drive in Daytona Beach, Florida. The UTM coordinates are Zone 17, 486.30 km East, and 3224.26 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Facility-wide and Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by

the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orange County, Florida

Caroline D. Shine
District Air Program Administrator
Central District

June 12, 2012
Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) 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 June 12, 2012 to the persons listed below.

Mr. Tim Phillips, P & S Paving, Inc.: **Timphillips@pandspavinginc.com**
Mr. Lynn Robinson, P.E., Permitting Manager, Southern Environmental Sciences, Inc.: **lrobinson@sesfla.com**

Clerk Stamp

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

Digitally signed by Tracy L Agner
DN: cn=Tracy L Agner, o=Central District, ou=FDEP, email=tracy.agner@dep.state.fl.us, c=US
Date: 2012.06.12 13:34:03 -04'00'

(Clerk)

June 12, 2012
(Date)

FACILITY AND PROJECT DESCRIPTION

Daytona Beach Asphalt Plant

This facility is a double barrel drum mix asphalt plant with an actual maximum production rate of 250 tons per hour. This facility is also permitted to operate a 250 tons/hour Rock and RAP (recycled asphalt pavement) crushing system at this site.

The existing facility consists of the following emissions units.

Facility ID No. 1270172	
ID No.	Emission Unit Description
001	Drum Mix Asphalt Plant
002	Rock and RAP Crushing System

Project Description

This project renews and revises Permit No. 1270172-004-AO and incorporates conditions from Air Construction Permit No. 1270172-005-AC (allowed the use of natural gas as a fuel).

Exempt Emission Units/Activities

- 1.38 MMBTU/hr helical coil hot oil heater used to heat portions of the hot asphalt silo and bucket elevator.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source.
- The facility is subject to New Source Performance Standards 40 CFR 60, Subpart I – Hot Mix Asphalt Facilities (Appendix F) and 40 CFR 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants (See Appendix G),
- The facility is subject to 40 CFR 60, Subpart A – General Provisions (Appendix E)

PERMIT HISTORY/AFFECTED PERMITS

Renews and revises Permit No. 1270172-004-AO and incorporates conditions from Air Construction Permit No. 1270172-005-AC.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Air Resource Management Section. The Central District's mailing address and phone number is:

   Florida Department of Environmental Protection
   Central District Office
   Air Resource Management Section
   3319 Maguire Blvd., Ste. 232
   Orlando, FL 32803-3767 Telephone: 407-897-4100

   All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Air Resource Management Section (see above mailing address and phone number)

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements;
   e. Appendix E. 40 CFR 60, Subpart A - General Provisions;
   f. Appendix F. 40 CFR 60, Subpart I - Hot Mix Asphalt Facilities; and
   g. Appendix G. 40 CFR 60, Subpart OOO - Nonmetallic Mineral Processing Plants

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units 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, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. 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.]

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

   a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*;

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.; and

   c. copies of the most recent compliance test reports required by Specific Condition No. **A.20**., if not previously submitted.

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU No. 001 (Drum Mix Asphalt Plant) and EU No. 002 (Rock and RAP Crushing System)

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Drum Mix Asphalt Plant. This plant is manufactured by Astec, and is a Model RDB-400ST. The maximum sulfur content of all liquid fuels is 1.0 percent. Particulate emissions are controlled with a dry cyclone followed by a Model RBH-67: TDB baghouse. The baghouse has Arimid fiber bags with a total cloth area of 11,616 square feet and an air to cloth ratio of 5.75 to 1 at 66,800 acfm.
002	Rock and Recycled Asphalt Product (RAP) Crushing System. The system is an Astec Industries, Inc. (Telsmith, Inc., an Astec Company) crushing system, Serial Number 505M2875. The system is equipped with a 2 –deck screen, transfer conveyors, stacking conveyors, and return conveyor.

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements: The drum mix asphalt plant (Emission Unit 001) is subject to 40 CFR 60, Subpart A – General Provisions and 40 CFR 60, Subpart I – Hot Mix Asphalt Facilities, which are adopted by reference in Rule 62-204.800, F.A.C. The Rock and RAP Crushing System (Emission Unit 002) is subject to 40 CFR 60, Subpart A – General Provisions, where applicable, and 40 CFR 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants where applicable. The conditions are incorporated into this permit (attached and part of this permit, see Appendices E, F, and G). [Rule 62-204.800(8), F.A.C.]

A.2 Permitted Capacity: The process rate for the drum mix asphalt plant shall not exceed 500,000 tons of a virgin or recycle mix asphalt product per any consecutive 12-month period.
The process rate for the portable RAP crushing system shall not exceed 250 tons per hour of RAP. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.3. Authorized Fuel: Natural gas can be used as a fuel for the Drum Mix Asphalt Plant.
Total fuel oil consumption shall not exceed 1.2 million gallons in any consecutive 12-month period of the combination of the following fuels:

a. new no. 2 through no. 6 fuel oils; and
b. on specification used oil

[Permit Application dated 08/30/2011 and Rule 62-210.200(PTE), F.A.C.]

A.4. Sulfur Content: The maximum sulfur content of all fuel oils consumed shall not exceed 1.0 percent, by weight.
[Rule 62-210.200(PTE), F.A.C.]

A.5. Restricted Operation: The hours of operation of the drum mix asphalt plant shall not exceed 2,080 hours per any consecutive 12-month period. The hours of operation of the RAP crusher are not limited. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A. EU No. 001 (Drum Mix Asphalt Plant) and EU No. 002 (Rock and RAP Crushing System)

A.6. On-Specification Used Oil Requirements: The following used oil specifications are applicable. Used oil within the allowable levels is "on-specification" and used oil exceeding any allowable level is "off-specification."

Constituent/Property	Allowable Levels	Test Methods
Arsenic	5 ppm maximum	**Test Methods used in** EPA SW-846
Cadmium	2 ppm maximum	**Test Methods used in** EPA SW-846
Chromium	10 ppm maximum	**Test Methods used in** EPA SW-846
Lead	100 ppm maximum	**Test Methods used in** EPA SW-846
Flash Point	100° F minimum	**Test Methods used in** EPA SW-846
Total Halogens	4,000 ppm maximum*	**Test Methods used in** EPA SW-846
PCB	< 50 ppm	**Test Methods used in** EPA SW-846

*Used oil containing between 1,000 and 4,000 ppm of total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste and cannot be utilized unless the applicant first rebuts this presumption by demonstrating that Used Oil does not contain hazardous waste and receives written approval from the Department. [Rule 62-710.210(3), F.A.C.; 40 CFR Part 279.11]

A.7. Additional On-Specification Used Oil Requirements: When used oil is fired, the facility must operate in compliance with all applicable regulations and Department policy including the requirements of Rule 62-710, Part V, F.A.C. and 40 CFR 266 Subparts D and E and any new regulations subsequently adopted, and the following conditions shall apply:

a) Each time used oil is transferred to the facility storage tank a sample of used oil to be burned shall be analyzed for arsenic, chromium, cadmium, total halogens, PCB, flash point, and lead using EPA/DEP or ASTM approved methods prior to being fired. Alternately, the used oil vendors' analysis for the referenced parameters may be utilized to satisfy this condition. Results of the used oil sampling and analysis shall be retained on site for a three year period.

b) The total quantity of used oil burned during each calendar year, on a monthly basis, shall be included in the Annual Operations Report for Air Emissions Sources.

c) The firing of used oil which contains PCB at concentrations greater than 2 ppm and less than 50 ppm is regulated by 40 CFR 761. The source cannot fire used oil which contains PCB concentrations in this range during startup or shutdown in accordance with 40 CFR 761.20(e)(3), and the source must submit to this office a copy of the written notice described in 40 CFR 761.20(e)(3)].

A. EU No. 001 (Drum Mix Asphalt Plant) and EU No. 002 (Rock and RAP Crushing System)

EMISSIONS STANDARDS

A.8. Visible Emission (VE) Limitation: Visible emissions from the drum mix asphalt plant shall not be equal to or greater than 20 percent opacity. [40 CFR 60 Subpart I, 60.92(a)(2) and adopted by reference in Rule 62-204.800(8)(b), F.A.C.]

A.9. Visible Emission (VE) Limitation: Visible emissions from any crusher, grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station, or any other emission point subject to 40 CFR 60, Subpart OOO, shall comply with the following opacity limits:

Pollutant	**With Capture System** (opacity)	**Without Capture System** (opacity)
VE	10 percent	15 percent

[40 CFR 60 Subpart OOO and adopted by reference in Rule 62-204.800(8)(b), F.A.C.]

A.10. Particulate Matter (PM) Limitation: Particulate emissions shall not exceed 0.04 grains per dry standard cubic foot averaged over a three (3) hour period.
[40 CFR 60 Subpart I, 60.92(a)(1) and adopted by reference in Rule 62-204.800(8)(b), F.A.C.]
Stack emissions from any crusher, grinding mill, screening operation, bucket elevator, transfer point on belt conveyors, bagging operation, storage bin, enclosed truck or railcar loading station, any baghouse that controls emissions from only an individual, enclosed storage bin, or any other emission point, shall not contain particulate matter in excess of 0.05 grams per dry standard cubic meter nor exceed 7 percent opacity, unless the stack emissions are discharged from a wet scrubbing control device.
[40 CFR 60 Subpart OOO, §60.672 and adopted by reference in Rule 62-204.800(8)(b), F.A.C.]

A.11. Unconfined Emissions of Particulate Matter: Unconfined emissions shall be controlled by using a water suppression system with spray bars located wherever unconfined emissions occur at the feeder, the entrance and exit of the crusher, screen, and the conveyor drop points. [Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

A.12. Compliance Tests: The drum mix asphalt plant shall be tested annually during each fiscal year (October 1 – September 30) to demonstrate compliance with the emissions standards for VE and PM emissions as specified in Specific Condition Nos. **A.8.** and **A.10**. [40 CFR 60 Subpart A, 60.8 and Rule 62-297.310, F.A.C.]

A.13. Compliance Tests: The Rock and RAP crushing system shall be tested **annually** during each fiscal year (October 1 – September 30) to demonstrate compliance with the emissions standard for VE emissions as specified in Specific Condition No. **A.9.**
[Rule 62-4.070(3), F.A.C.]

A. EU No. 001 (Drum Mix Asphalt Plant) and EU No. 002 (Rock and RAP Crushing System)

A.14. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.15. Additional PM Testing Requirements: Stack sampling facilities must comply with the following:

a. Rule 62-297.310 (6), F.A.C., regarding minimum requirements that include, but are not limited to: location of sampling ports, work platform area hand rails and toe rails, caged ladder access, and electrical power; and

b. A differential pressure gauge is required to measure the pressure drop across the baghouse, a minimum of 10 days prior to conducting the stack test.

[Rules 62-297.310(6) and 62-297.310(5)(b), F.A.C.]

A.16. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
EPA Method 5	Determination of Particulate Matter Emissions from Stationary Sources: **The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf).**
EPA Method 9	Visual Determination of the Opacity of Emissions from Stationary Sources: **Shall be conducted for 30 minutes or the length of the batch/cycle if less than 30 minutes.**

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.401, F.A.C.; Appendix A of 40 CFR 60; 40 CFR 60.93 (b)(1) and (2)]

A.17. Operating Rate During Testing: Testing of emissions should be conducted within 90 to 100 percent of the maximum permitted operating rate of **250 tons/hr**. of asphalt product. If it is impracticable to test at the maximum permitted operating rate, then the emission unit may be tested at a lesser rate. In this case, subsequent emission unit operation is limited to 110 percent of the test load 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 purposes of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]

[Permitting Note: The operation rate for the asphalt plant during stack testing on September 12, 2011 was approximately 230.0 tons per hour of asphalt product.]

A. EU No. 001 (Drum Mix Asphalt Plant) and EU No. 002 (Rock and RAP Crushing System)

NOTIFICATION REQUIREMENTS

A.18. Test Notification: The permittee shall notify the Compliance Authority, 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 permittee.
[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

MONITORING REQUIREMENTS

A.19. Fuel Sulfur Content: The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using ASTM methods ASTM D4057-88 and one of ASTM D2622-94, ASTM D4294-98, ASTM D1552-95 or ASTM D129-91 or more recent editions adopted and incorporated by reference in Rule 62-297.440(1), F.A.C. Alternately, after written notification to and approval by the Department, the permittee may use other DEP Air Program-approved methods, i.e. alternate sampling procedures, for sulfur in petroleum products.
[Rule 62-4.070, F.A.C.]

RECORDS AND REPORTS

A.20. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

A.21. Fuel Oil Sulfur Content Records: The permittee shall maintain records to demonstrate that the sulfur content, by weight, of each shipment of new and on-spec used oil is less than 1.0 percent as specified in Specific Condition **A.5.** and that the sulfur content was determined in accordance with the methods listed in Specific Condition **A.19.**
[Rule 62-210.300(3)(c)1.c., F.A.C.]

A.22. Monthly Log: In order to demonstrate compliance with Specific Condition Nos. **A.2., A.3**., and **A.5.**, the permittee shall maintain a log at the facility for a period of at least five (5) years from the date the data is recorded. The log at a minimum shall contain the following:

Monthly

a. Designation of the month and year of operation for which the records are being tabulated;

b. Consecutive 12 month total of fuel oils used (combination of new no. 2 through no. 6 fuel oils, and on specification used oil) by the asphalt plant and the crusher;

c. Consecutive 12 month total of the asphalt product produced by the drum mix asphalt plant; and

d. Operational hours for the drum mix asphalt plant.

The monthly logs shall be completed by the end of the following month.

A. EU No. 001 (Drum Mix Asphalt Plant) and EU No. 002 (Rock and RAP Crushing System)

Note: A consecutive 12 month total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-month total treats each month of the year as the end of a 12-month period. A 12-month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month.
[Rule 62-4.070(3), F.A.C.].