ENVIRONMENTAL COMPLIANCE PLAN

FOR

ROADS, INC.

CANTONMENT ASPHALT PLANT

15 BECKS LAKE ROAD

June 2014

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1.0 INTRODUCTION

This Environmental Compliance Plan (Plan) provides basic information demonstrating the Owner's commitment to and provides reasonable assurance that this facility will operate in accordance with applicable laws and rules.

This Plan was developed in accordance with the unique requirements of the individual facility and provides the operator with adequate information and description regarding design and operation and maintenance features of the facility. The Plan includes basic engineering design criteria for the facility and information concerning process control and performance evaluation for the facility, and equipment and procedural descriptions for emergency conditions. Regular maintenance and repair instructions for plant equipment and monitoring procedures are also included.

This plant includes the following elements:

- Operator Training: concerning plant operation, permit and other regulatory requirements.
- Plant Monitoring: establishment and use of parameters to monitor plant operation such as baghouse pressure differential and visible emissions.
- Operation and Maintenance Plan: establishment and use of a plant specific Operation and Maintenance (O&M) Plan.
- Facility Inspections: use of periodic facility walk-through inspections by plant staff with specific inspection guidelines, checklists and record keeping.

2.0 CORPORATE COMMITMENT

Roads, Inc. adheres to a strong, company-wide environmental program and relies on a comprehensive environmental program which was developed to ensure the highest commitment and quality from the business operation as well as from employees, to protect and enhance the environment. This program includes an environmental policy, environmental auditing procedures, and employee education and involvement.

3.0 OPERATOR TRAINING

This Plan represents a continuing education program for all plant operators concerning plant operation, permit, and other regulatory requirements. A copy of the approved Plan will be available to the operators, maintenance personnel, technicians, and laboratory personnel.

Personnel will be trained to operate the facility in accordance to the factory training manual and this Plan. Consequently, new employees will be trained within 90 days after commencement of employment and prior to unsupervised plant operation. In addition, periodic safety meetings are required for all plant personnel and often cover environmental topics including air permit requirements.

Environmental education is key to maintaining successful environmental stewardship. Education includes new hire orientation and training sessions. During orientation, new hires are educated about the various permits, permit conditions, and monitoring requirements.

The training sessions teach management and supervisory personnel about dust control, waste management, spill prevention, air permits, and other environmental topics. These training sessions are intended to teach plant management the environmental issues so that they can teach their employees. Plant operators also get trained on how to read opacity from their stacks.

4.0 PLANT MONITORING

This section establishes the use of parameters to monitor plant operation such as pressure differentials and visible emissions. The facility conducts reasonable monitoring to assure continued compliance with the terms and conditions of their permit. The monitoring will be carried in the manner prescribed in this procedure.

The performance parameters include such physical, chemical or electrical characteristics as are applicable to the particular emissions unit and which are indicators of the condition, operating rates, and efficiencies. Such parameters generally include the following indicators for baghouses:

- Bag pressure drop
- Gas flow rate: direct method preferred, indirect method acceptable
- Air to cloth ratio
- Bag weave
- Bag material
- Gas temperature at inlet and outlet
- Condition of gas
- Frequency of reverse airflow operation

The operating protocol addresses the physical steps and procedures to be followed by the operator when monitored parameters are outside the typical operating range. Proper operation of baghouse dust collector requires the use of differential pressure gauges (such as magnehelic) that can indicate a sudden decrease in pressure (as system leak) or a sudden rise in pressure (binding or plugging problems). U-tube manometers can also be used to help identify problems with dampers and bags by indicating the difference in pressure across the baghouse. A magnehelic guage or manometer indicates the pressure differential across the filter elements in inches of water.

All asphalt plants create fine dust carryout from drum dryer, screens, and weigh box. In order to meet federal and state air quality codes, emission control equipment is necessary to capture particulate emissions that might otherwise be released into the atmosphere. During the dust filtering operation, material is collected by the filter elements causing a reduction in porosity. In order to maintain correct pressure differential across filtering bags, a cyclic timer periodically actuates reverse air flow so that a portion of exhaust air flows back into baghouse filters, causing filter elements to clean.

The operating parameters of the pollution control equipment to be monitored are as follows:

- Pressure drop (delta P) across the baghouse
- Visible emissions

The pressure drop across the baghouse is a useful parameter to monitor baghouse performance. A given baghouse will operate within a pressure drop range.

A pressure drop much lower than the lower end of the operating range could indicate:

- New bags which have not developed filter cake
- Bag failure
- Baghouse structural failure
- Ductwork structural failure

A pressure drop much higher than the upper end of the operating range could indicate:

- Plugged bags
- Blocked stack
- Fan malfunction
- Plugged ductwork

This plan provides for monitoring of baghouse pressure drop. The data will be established to indicate typical operating range of pressure drop for this baghouse. Any values noted which fall significantly outside this range will be noted. An appropriate investigation will follow to determine the cause of the variation and to evaluate any attendant effect on visible emissions.

Additi8onally, the permit requires annual p articulate matter testing using EPA Method 5, to determine compliance with DEP rules and the New Source Performance Standard. Each such annual testing event will provide an opportunity to evaluate a possible correlation between baghouse pressure drop, opacity, and particulate matter emission rate. A daily observation of stack gas opacity will be conducted by the plant operator, as part of the daily inspection (see Facility Inspections).

The pressure drop (delta P) across the baghouse will be monitored at least once during each day of plant operation. The delta P value will be logged on the plant's daily production report. The numerical value of this parameter, in inches of water, will be determined by a magnehelic gauge.

5.0 OPERATION AND MAINTENANCE PLAN

This section establishes a plant specific Operation and Maintenance (O&M) Plan. This element provides reasonable assurance that this facility can be effectively operated and maintained, through reasonable provisions for the operation and maintenance of the facility. Routine maintenance of equipment will be performed as needed to assure optimal operation. The facility shall be operated to control objectionable odors in accordance with Rule 62-296.320(2), F.A.C. Fuels, solvents, lubricants, and other maintenance materials shall be stored in approved areas.

This plan includes a schedule for the maintenance and inspection of the control device and collection system and schedule for recording performance parameters of the control device. The O&M Plan included identification of the control device for each emissions unit subject to provisions of the Plan, including the following design specifications and other descriptive data:

- Manufacturer: Asphalt Equipment Company
- Model number: 62KRA
- Type: Reverse flow baghouse
- Flow rate (gas): estimated 62,000 acfm
- Efficiency rating at design capacity: 99.96%
- Pressure drop: 3”-5” W.G.

The Plan includes performance parameters that indicate the rate of operation, process weight throughput and fuel usage rate. Such parameters include the following:

- Weight per unit time of raw materials input: 300 TPH
- Process temperature or pressure or pressure:
- Fuel or fuel mixture: No. 2 or No. 4 fuel oil with maximum sulfur content of 0.6% or natural gas

The Plan contains inspection and maintenance schedules including periodic assessments of the condition of ducting, hoods, conveyors, and other equipment and schedule for recording of performance parameter data.

Startup of Baghouse:

- Start all electric drive components to ensure proper rotation
- Check and make sure that reverse airflow system is operating
- Check and make sure that filtrates removal system from baghouse hopper is operating properly
- Run exhaust fan and check to see that magnehelic guage lines are connected correctly
- At start-up, preheat baghouse to 300°F before aggregate is introduced into dryer. Pre-heating time will vary according to ambient temperatures and moisture conditions at plant site. NOTE:

This should be done first thing in the morning and then again only after prolonged shutdown during the day (30 minutes or more).

- Minimum inlet temperature to baghouse should never be allowed to fall below 240°F or condensation may occur inside the baghouse causing bag mudding or blinding which will result in very high static pressures and loss of adequate draft for proper dryer operation.

Shutdown of Baghouse:

- At shutdown, always keep timer and augers operating after dryer shutdown to clean out baghouse. This will prevent a cold slug of dust from reaching the plant at next startup. Also the dust auger could be stalled if slugged with cold, wet dust.

- If at any time a constant stream of dust is being emitted from the fan stack, check for a mechanical leak or worn/torn bag(s). If a leak develops, the area can usually be easily spotted from the clean airside by a large deposit of dust around the leak area. Should a leak develop, clean dust from area and reseal both sides of the leak with RTV 732 silicone sealant or equivalent. This type of selant is required to withstand the high temperatures of a baghouse.

Access doors allow for maintenance personnel to enter the baghouse equipment for leak detection, filter bag changes, and proper identification of operational problems. These doors need to create a positive seal to reduce baghouse or ambient air intake and heat loss on all negative systems. They also need to seal properly to reduce condensation that can cause filter bag damage and severe metal corrosion. To prevent air infiltration and insure a positive contact between the door seal and door pan, a proper door seal material must be used. There are various materials designed to meet the specific needs of door applications based on gas chemistry, temperature, and door configurations. Check seals periodically and whenever the baghouse is opened for repairs or changeouts.

Routine Maintenance Includes:

Weekly

- Apply grease to all grease fittings
- Adjust all belt tensions

Monthly

- Blow out differential pressure gauge lines

Annually

- Shut down the plant's operations each year to conduct preventive maintenance procedures, which include changing the bags in the baghouse (as-needed) and turning the burner for maximum burner efficiency (as-needed)

6.0 FACILITY INSPECTIONS

This section describes the use of periodic facility "walk-through inspections" by plant staff with specific inspection guidelines. The condition of the facility will be noted and compared to its condition during the initial survey and during subsequent inspections.

Daily inspections are made by the plant operator prior to plant startup to make sure emission control components are in good working order. Proper maintenance and record keeping play a vital role in the operation of a baghouse. The information gathered can assist in implementing an effective preventive maintenance program. The documentation of inspections, observations, and maintenance will help determine the baghouse operating efficiency and help prevent a plant from reaching noncompliance status.

Routine observations of the pollution control devices are:

Daily

- Record differential pressure
- Check operation and frequency of reverse airflow system
- Check baghouse filtrates conveying system
- Check for visible stack emissions
- Check for miscellaneous visible emissions throughout plant

Monthly

- Check access door seals for leaks
- Check door seals for deterioration

Semi-Annually

- Inspect all accessible functional spaces
- Record frequency of reverse flow operation
- Check bag conditions (dirty side)
- Check fan
- Check all belt tension

Annually

- Check case support for corrosion
- Check all bolts and welds
- Check ductwork for buildup of dust

7.0 RECORD KEEPING

Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained for a minimum of two years and shall be made available to DEP upon request. These records are retained at the plant office.

Records that should be kept regularly include baghouse pressure drop. Recordings are maintained to be used in comparison to current baghouse data.

Record keeping requirements include:

- Records of control equipment operating parameters
- Records of control system malfunctions or failures and corrective actions taken
- Results of compliance tests required by DEP shall be reported to DEP within 45 days after completion of test

8.0 PERIODIC PLAN REVIEW

This Plan will be reviewed at least annually from the date of approval. This review will evaluate the effectiveness of the Plan and will make any changes necessary for the Plan to be continuously administered.

The Environmental Compliance Plan shall be updated as operations change, but no less frequently than upon renewal of the permit. DEP shall be notified of changes to this Plan other than those required for routine maintenance. The Plan shall be revised when operational procedures change, to reflect any facility alterations performed or to reflect experience resulting from facility operation. The facility will periodically review and revise the operating protocol, as appropriate to ensure satisfactory system performance.

9.0 ABNORMAL EVENTS

In the event facility is temporarily unable to comply with any of the conditions of the DEP permit due to breakdown of equipment, power outages, destruction by fire hazard, wind or other cause, the facility will notify DEP. Notification shall be made in person, by telephone, or other means within 24 hours of breakdown or malfunction. The telephone number to call and notify DEP is **(850) 595-0639** or **(850) 595-0616**. For emergencies involving a significant threat to human health or the environment, dial **911**.

A written report of any noncompliance referenced above shall be submitted to the DEP, 160 Governmental Center, Pensacola, FL 32502, within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its recurrence, emergency procedures in use pending correction of the problem, and the timeframe of when the facility will again be operating in accordance with permit conditions.

If an emergency arises or there is any condition which prevents the continued operation of the emissions control components or results in noncompliance with applicable regulations, the operator will:

- Stop production immediately
- Notify the Area Superintendent(s) as soon as practically possible, of the time, date, and nature of the occurrence and the corrective action(s) taken
- Ensure that the emission control components are in good working order before resuming production

ATTACHMENT A

Daily Log

Roads, Inc.
Cantonment, FL Asphalt Plant

Daily Log

Date:_____

Tons Mixed:_____

Hours Operated:_____

Average tons/hour:_____

Daily Checks

Magnehelic Reading:_____ " W.G.

Stack Visible Emissions Present: _____yes _____no

Reverse Airflow System Operating: _____yes _____no

Baghouse Filtrates Conveying System Operating: _____yes _____no

_____ _____

(date) (Plant Manager)