Memorandum **Florida Department of Environmental Protection**

TO: J. Charles Harp
Program Administrator
Waste Management/Air Resources

THROUGH: Armando I. Sarasua, P.E.
Air Permitting Supervisor

FROM: Howard Ard
Permit Engineer

DATE: July 16, 2014

SUBJECT: Evaluation Summary for Roads, Inc.; Roads Cantonment Asphalt Plant, permit No. 7775744-002-AO, Escambia County

We recommend issuing a permit to Roads, Inc. to operate their Roads Cantonment Asphalt Plant. This initial non-Title V air operation permit incorporates permit No. 7775744-001-AC, issued November 1, 2012, which authorizes construction of this new facility.

Process Description.
This facility is a new relocatable 300 tons per hour Almix uni-flow drum mix asphalt concrete plant manufactured by Asphalt Equipment Company. The plant is fueled primarily with natural gas; however, the facility may also burn fuel oil with a sulfur content of 0.6 % or less, by weight. The burner firing rate is 80.5 MM Btu/hr at the maximum plant operating rate. The maximum recycled asphalt pavement (RAP) usage rate is 35% for the product mix.

Aggregate is brought on site by truck and stored in piles. Front end loaders are used to transfer aggregate from storage piles to the aggregate storage bins. Aggregate from the bins are proportioned by calibrated belt feeders onto a common collection belt, and then conveyed to a slinger conveyer which throws the material into the drying drum. After the aggregate is thoroughly dried, it is combined with RAP and baghouse fines, preheated to drive off moisture, and mixed with hot liquid asphalt in the mixing drum to create the asphalt concrete product. The final product is conveyed by a fully enclosed chain conveyor to storage silos for discharge into trucks.

A relocatable RAP crushing system, operating under an Air General Permit, may be brought on site periodically to provide RAP for the asphalt mix.

Pollution Control Equipment.
Particulate matter emissions from the plant are controlled by an Almix baghouse. Fines from the baghouse are recycled into the asphalt mix.

Environmental Impact (tons/year).

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions	Allowable Emissions
PM_{total}	62-210.300(3)(c)2.d.	10.6	0.04 gr/dscf
SO_2	62-210.300(3)(c)2.	49.5	<100
VOC	N/A	8	<100
NOx	N/A	13.8	<100
CO	N/A	32.5	<100
Objectionable Odors	62-296.320(2)	N/A	None allowed off plant property
VE	62-210.300(3)(c)2.f.	N/A	Not more than 20% opacity

Applicable Rules & Regulations. The source is regulated under 40 CFR 60 Subpart I, Standards of Performance for Hot Mix Asphalt Facilities, and Rule 62-210.300(3)(c)2., F.A.C., Conditional Exemptions from Title V Permitting. The facility is a synthetic minor source with annual throughput limited to 500,000 tons of asphalt concrete per year. Fuel oil consumption for all oil-burning stationary equipment at this site is limited to 1.1 million gallons in any consecutive 12-month period, and the fuel oil sulfur content shall not exceed 0.6%, by weight. Application of Rule 62-210.300(3)(c)2.a. - j., F.A.C. allows the facility to be conditionally exempt from Title V permitting.

Compliance Monitoring. Annual compliance testing is required for PM and VE. Records of fuel oil consumption and asphalt concrete production are to be maintained. An Environmental Compliance Plan is required.

Compliance History. This is a new facility.

Fee Summary. This is an AO2A ($1,500 fee) minor source with a stack test. The original construction permit fee was $2,000 for an AC1D facility (source 25 tpy but less than 50 tpy).

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