BEST AVAILABLE CONTROL TECHNOLY (BACT) STATEMENT

Per 310 CMR 7.02(5) and Massachusetts Department of Environmental Protection (MassDEP) guidance, a plan approval application must include top-case BACT or a top-down BACT analysis for any new or modified emission unit.[1] The Seekonk Asphalt plant proposes to install top-case BACT as established in recent plan approvals for a similar source:

- American Industries, 1 Adams Road, East Brookfield, MA, Approval #: CE-20-014, Issued 9/15/21
- Bristol Asphalt Co, 99 Kings Highway, Rochester, MA, Approval #: AQ02P-0000034, Issued 8/26/21

The BACT emission limits will be achieved by using the following equipment and methods:

1. Particulate matter emissions from raw material/aggregate handling will be controlled by Best Management Practices (BMP) which include using pre-washed aggregate, using three-sided storage bins, and keeping all driving surfaces free of dust by vacuum sweeping and water sprays.

2. Emissions of NOx, CO, VOC, and HAP from the rotary dryer will be controlled by a low- NOx burner and good combustion practices. Each of these air contaminants will meet its. SO2 emissions from the rotary dryer will be inherently low because only natural gas will be used.

3. Particulate matter emissions from the rotary dryer will be controlled by a fabric filter baghouse, and will meet the Top-Case BACT limit of 0.01 grains per dry standard cubic foot ("dscf"). The baghouse will be equipped with an outlet temperature and pressure differential monitoring system, with instantaneous readings in the control room. The baghouse will be equipped with audible and visual alarms to alert the operator of the need for corrective actions. Visolite testing of the baghouse will be conducted at the start of each production season and monthly thereafter.

4. Hydrocarbon/particulate matter emissions from the liquid asphalt tank will be controlled by vent condensers. Vapors displaced from the tank during filling shall be directed back into the delivery vehicle through a vapor balance process.

5. Blue smoke hydrocarbon/particulate matter emissions from the HMA will be captured by the top of silo blue smoke control system. The top of silo and bottom of silo blue smoke control systems will duct emissions from filling the silos to the combustion chamber of the dryer/mixer. The truck load-out area will be enclosed with vertical plastic strips, and emissions from the load-out area will collected by the Blue Smoke Control Model 6S20C or equivalent. This represents top-case BACT for such operations.

[1] http://www.mass.gov/eea/docs/dep/air/approvals/aq/aqpaguid.pdf