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**west virginia department of environmental protection**

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Earl Ray Tomblin, Governor  
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**GENERAL PERMIT REGISTRATION APPLICATION  
ENGINEERING EVALUATION / FACT SHEET**

**BACKGROUND INFORMATION**

Registration No.: G20-B021A  
Plant ID No.: 025-00013  
Applicant: Southern West Virginia Asphalt, Inc.  
Facility Name: Alta Facility  
Location: Alta, Greenbrier County  
SIC Code: 2951  
Application Type: Modification  
Received Date: November 17, 2014  
Engineer Assigned: Thornton E. Martin Jr.  
Fee Amount: \$1500.00  
Assigned Date: November 19, 2014  
Complete Date: March 24, 2015  
Applicant Ad Date: November 18, 2014  
Newspaper: *The West Virginia Daily News*  
UTM's: Easting: 539.074 km Northing: 4192.161 km Zone: 17  
Description: Applicant proposes to add a portable fractionated reclaimed asphalt pavement (FRAP) processing system.

**TYPE OF PROCESS**

Coarse aggregates and fine aggregates are brought to the asphalt plant stockpile area via truck and dumped on site (TP1/MD). A front end loader works the material into one of six stockpiles OS1/N through OS6/N (TP2/MD). Aggregates are unloaded from the stockpiles OS1/N - OS6/N into aggregate cold feed bins B1/PE through B4/PE (TP3/MD), then onto belt conveyor BC1/N (TP4/PE through TP7/PE), which transports the aggregates to a scalping screen S1/PE (TP8/PE). Oversized materials falls to the ground (TP9A/N) and sized material is transferred to belt conveyor BC2/N (TP9/PE), which transfers the materials to the slinger belt BC3/N (TP10/PE) that transports them to the parallel flow drum mixer PFDM1/APCD1 (TP11/PE). The drum mixer is vented to the Baghouse APCD1, which is fitted with a knock -down box. PFDM1 is fueled by fuel oil (T2) or used oil (T3).

Recycled asphalt pavement (RAP) is brought by truck and is also dumped on site

(TP12/MD). An end loader works the RAP into stockpile OS7/N (TP13/MD). RAP is unloaded from the RAP stockpiles OS7/N with an end loader and dumped into RAP bin B5/PE (TP14/MD). From this bin, the material drops onto conveyor belt BC4/N (TP15/PE), which transports the RAP to scalping screen S2/PE (TP16/PE). Properly sized material from the screen falls onto conveyor belt BC5/N (TP17/PE). Oversized material falls onto conveyor belt BC6/N (TP18/PE), which leads to the crusher CRS1/FE (TP19/PE). The crushed RAP drops onto conveyor belt BC7/N (TP20/PE), then onto BC5/N (TP21/PE) that carries it to the drum mixer PFDM1 (TP22/PE).

Hot Mix asphalt (HMA) is transferred from PFDM1 directly to the slat conveyor OT1/FE (TP23/PE), which transports the material to HMA silos BS1/FE and BS2/FE (TP24/PE). From the HMA silos, the material is loaded into trucks (TP25/PE).

Baghouse fines from APCD1 are transferred to screw conveyor OT2/FE (TP26/FE) and back to the drum mixer PFDM1 via TP27/FE where they are coated by liquid asphalt and become part of the final product.

Asphaltic cement is stored in tank T1, which is heated by asphalt heater AH1 (2E). Used oil (for fuel) is stored in tank T3 and fuel oil is stored in tank T2.

### *Proposed Modification*

Southern West Virginia Asphalt, Inc. (SWVA) will be using an ASTEC ProSizer 3100 (a portable FRAP processing system), to process RAP at the site into a high-quality, well-graded aggregate coated with asphaltic cement. The ASTEC ProSizer 3100 is equipped with a 200 tph double-deck screen and a 75 tph horizontal shaft impactor. The unit is powered by a John Deere 6068H 173 hp engine (F-ENG1/N [F-1E]). A portable radial stacker will be used with the system and will be powered by the same engine. The unit will be utilized for a short time before it is moved to another site and will return to the site as needed. The existing RAP system will remain at the site. FRAP will be fed into the asphalt plant via the existing RAP feed system and the RAP throughput of the asphalt plant will not be increased. This modification does not include an increase in the maximum storage capacity of the raw and sized RAP stockpile (OS7/N).

RAP from existing RAP stockpile (OS7/N) is loaded into the feed hopper F-H1/PE by an endloader [F-TP1/MD]. The feed bins feeds belt conveyor F-BC1/PE [F-TP2/FE], which transports the RAP to the double-deck screen F-S1/FE [F-TP3/PE]. Oversized material is fed to belt conveyor F-BC2/N [F-TP4/FE], which transports the material to the horizontal shaft impactor F-CR1/FE [F-TP5/FE]. The material drops from the crusher onto belt conveyor F-BC1/PE [F-TP7/FE], which transports it back to the screen. The crusher can also be arranged so that oversized material from the screen bypasses the crusher and returns to the existing raw RAP stockpile OS7/N [F-TP6/N].

Sized FRAP stockpiles OS7A/N and OS7B/N will be part of the existing RAP stockpile OS7/N. The throughput of RAP will not be changed with this application, nor will additional storage be created. RAP will either be sized to a single size using the existing RAP equipment and there will be a single large RAP stockpile OS7/N, or RAP will be sized to two different sizes with the portable FRAP equipment and there will be two smaller sized FRAP stockpiles OS7A/N and OS7B/N but, the capacity and base area of the RAP/FRAP stockpiles will remain unchanged.

The smaller fractions from the screen are discharged to belt conveyor F-BC3/N [F-TP8/PE] and F-BC4/N [F-TP10/PE]. F-BC3/N and F-BC4/N can transfer material directly to the sized RAP stockpiles OS7A/N [F-TP9/MD] and OS7B/N [F-TP11/MD] or to radial stacker F-RS1/N [F-TP9/MD or F-TP11/MD]. The radial stacker is only fed by one of the belt conveyors F-BC3/N or F-BC4/N at any given time; not both at the same time. Material from F-RS1/N is transferred to OS7A/N or OS7B/N [F-TP12/MD]. From stockpiles OS7A/N and OS7B/N, material are transferred via endloader to the existing stationary RAP bin (Bin 5) [TP14/MD].

When FRAP is transferred to the existing RAP system, the flop gate on the screen is opened so the fractionated RAP passes through the screen and is not double-processed.

See the following tables for description, maximum throughput, control equipment, and maximum storage for all permitted equipment at the Plant#52 Alta facility:

TABLE 1: Equipment Summary (G20-B021A)

Equipment ID No.	Description	Date of Change	A M R <sup>2</sup>	Maximum Capacity		Control Equipment <sup>1</sup>
				TPH	TPY	
<b>Equipment</b>						
PFD1	Parallel Flow Drum Mix Plant	1995	M	300	300,000	APCD1
S1	Screen	2009	M	300	300,000	PW
S2	Screen	2009	M	75	75,000	PW
CRS1	Crusher	2009	M	25	25,000	FE
AH-1	Asphalt Heater – #2 Fuel Oil (7 gal/hr, 2880 hr/yr)	1995	M	----	----	N
<b>FRAP System</b>						
F-H1	FRAP Feed Hopper	2015	A	25	75,000	PE
F-BC1	FRAP Belt Conveyor	2015	A	200	75,000	PE
F-S1	FRAP Screen	2015	A	200	75,000	FE
F-BC2	FRAP Belt Conveyor	2015	A	75	28,125	N
F-CR1	FRAP Crusher	2015	A	75	28,125	FE
F-BC3	FRAP Belt Conveyor	2015	A	200	75,000	N
F-BC4	FRAP Belt Conveyor	2015	A	200	75,000	N
F-RS1	FRAP Radial Stacker	2015	A	200	75,000	N
F-ENG1	FRAP Engine (John Deere 6068HFC93A-mfg.2013)	2015	A	9.28 gal/hr	173 hp	N
<b>Conveyors</b>						
BC1	Belt Conveyor	2009	M	300	300,000	N
BC2	Belt Conveyor	2009	M	300	300,000	N
BC3	Belt Conveyor	2009	M	300	300,000	N
BC4	Belt Conveyor	2009	M	100	75,000	N
BC5	Belt Conveyor	2009	M	100	75,000	N
BC6	Belt Conveyor	2009	M	100	75,000	N
BC7	Belt Conveyor	2009	M	100	75,000	N
OT1	Slat Conveyor	2009	M	300	300,000	FE
OT2	Screw Conveyor	2009	M	9	9,000	FE
<b>Storage</b>						
OS1	Aggregate Stockpile	2009	M	----	100,000	N

Equipment ID No.	Description	Date of Change	A M R <sup>2</sup>	Maximum Capacity		Control Equipment <sup>1</sup>
				TPH	TPY	
OS2	Aggregate Stockpile	2009	M	----	200,000	N
OS3	Sand Stockpile	2009	M	----	150,000	N
OS4	Sand Stockpile	2009	M	----	50,000	N
OS5	Aggregate Stockpile	2009	M	----	50,000	N
OS6	Aggregate Stockpile	2009	M	----	50,000	N
OS7A	RAP Stockpile	2015	A	----	75,000	CA
OS7B	RAP Stockpile	2015	A	----		CA
B1	Aggregate Bin	2009	M	20 tons	300,000	PE
B2	Aggregate Bin	2009	M	20 tons		PE
B3	Aggregate Bin	2009	M	20 tons		PE
B4	Aggregate Bin	2009	M	20 tons		PE
B5	RAP Bin	2009	M	20 tons	75,000	PE
BS1	HMA Silo	2009	M	200 tons	300,000	FE
BS2	HMA Silo	2009	M	200 tons		FE
<b>Tanks</b>						
T1	Storage Tank – Asphalt Cement	2009	M	24,000	350,000	N
T2	Storage Tank – #2 fuel oil	2009	M	20,000	1,000,000	N
T3	Storage Tank – Used Oil	2009	M	20,000	1,000,000	N

<sup>1</sup> FE - Full Enclosure; PE - Partial Enclosure; PW - Partial Enclosure w/water spray; MD - Minimum Drop Height; CA - Crusting Agent; APCD-1 - Baghouse; N - None

<sup>2</sup> A - Addition, M - Modification or No Change, R - Removal

## SITE INSPECTION

Fred Teel of the Compliance and Enforcement Section performed a full-on site inspection on June 09, 2014. The inspection resulted in a score of 30 - Facility In Compliance.

## ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Sources of emissions at eligible nonmetallic mineral processing plants include crushers, screens, transfer points (loading, unloading, etc.), open storage piles, bins, haulroads, reciprocating internal combustion engine power units and tanks.

Fugitive emission calculations for operations, transfer points, crushing and screening, storage piles, and paved and unpaved haulroads are based on AP-42 Fifth Edition, "Compilation of Air Pollution Emission Factors". The estimated emission calculations were performed by the applicant's consultant and were checked for accuracy and completeness by the writer.

The proposed modification will result in an increased estimated potential to discharge controlled emissions of 1.21 TPY of PM (particulate matter), of which 0.47 TPY are PM<sub>10</sub> (particulate matter less than 10 microns in diameter) and 0.13 TPY are PM<sub>2.5</sub> (particulate matter less than 2.5 microns in diameter). Other estimated emission increases include: VOC of 0.09 TPY, SO<sub>2</sub>

of 0.07 TPY, NO<sub>x</sub> of 1.06 TPY, CO of 0.23 TPY and Total HAP's of 0.001 TPY. Refer to the following tables for a complete summary of the proposed modified facility emissions:

TABLE 2: Proposed Emissions Increase

Pollutant	Point Source Emissions Increase		Fugitive Emissions Increase		Total Emissions Increase	
	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Total Particulate Matter	2.07	0.38	4.40	0.83	6.47	1.21
Particulate Matter-10	1.15	0.23	1.30	0.24	2.45	0.47
Particulate Matter-2.5	0.53	0.11	0.13	0.02	0.66	0.13
Volatile Organic Compounds	0.46	0.09	Not Applicable		0.46	0.09
Sulfur Dioxide	0.37	0.07			0.37	0.07
Nitrogen Oxides	5.65	1.06			5.65	1.06
Carbon Monoxide	1.22	0.23			1.22	0.23
Hydrochloric Acid	0.00	0.00			0.00	0.00
Acetaldehyde	0.001	0.0002			0.001	0.0002
Benzene	0.0012	0.0002			0.0012	0.0002
Ethylbenzene	0.00	0.00			0.00	0.00
Toluene	0.0005	0.0001			0.0005	0.0001
Xylene	0.0004	0.0001			0.0004	0.0001
Formaldehyde	0.0015	0.0003			0.0015	0.0003
Total HAPs	0.005	0.001			0.005	0.001

TABLE 3: Current Facility Emissions (G20-B021)

Pollutant	Point Source Emissions		Fugitive Emissions		Total Emissions	
	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Total Particulate Matter	22.12	17.99	30.0	14.70	52.12	25.78
Particulate Matter-10	14.40	11.77	6.0	2.87	20.40	10.08
Volatile Organic Compounds	20.7	7.68	Not Applicable		20.7	7.68
Sulfur Dioxide	17.9	11.85			17.9	11.85
Nitrogen Oxides	22.64	8.60			22.64	8.60
Carbon Monoxide	39.0	19.50			39.00	19.50
Acetaldehyde	0.39	0.19			0.39	0.19
Benzene	0.36	0.18			0.36	0.18
Ethylbenzene	0.114	0.057			0.114	0.057
Toluene	0.87	0.44			0.87	0.44
Xylene	0.12	0.06			0.12	0.06
Formaldehyde	1.08	0.54			1.08	0.54
Total HAPs	2.93	1.47			2.93	1.47

TABLE 4: Proposed Facility Emissions (G20-B021A)

Pollutant	Point Source Emissions		Fugitive Emissions		Total Emissions	
	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)	(lb/hr)	(ton/yr)
Total Particulate Matter	24.19	11.46	34.40	15.53	58.59	26.99
Particulate Matter-10	15.55	7.44	7.30	3.11	22.85	10.55
Volatile Organic Compounds	21.16	7.77	Not Applicable		21.16	7.77
Sulfur Dioxide	18.27	11.92			18.27	11.92
Nitrogen Oxides	28.29	9.66			28.29	9.66
Carbon Monoxide	40.22	19.73			40.22	19.73
Acetaldehyde	0.391	0.195			0.391	0.195
Benzene	0.361	0.180			0.361	0.180
Ethylbenzene	0.114	0.057			0.114	0.057
Toluene	0.871	0.435			0.871	0.435
Xylene	0.120	0.06			0.120	0.06
Formaldehyde	1.082	0.54			1.082	0.54
Total HAPs	2.939	1.467			2.939	1.467

Emission limits for the criteria pollutants of the Dryer were included in permit G20-B021. Emission limits for the smaller quantities of hazardous air pollutants (HAPs), haulroads, material handling, and asphalt heater were omitted. Emission limits for the Dryer will remain the same for the modification permit G20-B021A.

Therefore, G20-B021A includes the Dryer permitted emission limits as follows:

Source ID#	Nitrogen Oxides		Carbon Monoxide		Volatile Organic Compounds		Sulfur Dioxide		Particulate Matter-10		Formaldehyde	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Dryer	22.5	8.4	39	19.5	20.7	7.65	17.4	11.25	9.3	4.65	1.08	0.54

REGULATORY APPLICABILITY

The following regulations apply to the facility:

*45CSR2 To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers*

The purpose of this rule is to establish limitations for smoke and particulate matter which are discharged from fuel burning units. Per this rule, Section 2.14 defines an indirect heat exchanger as a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. Section 2.10 defines a fuel burning unit as any furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat

transfer. The facility will be subject to the opacity requirements in this rule, which is 10% opacity based on a six minute block average.

**45CSR3**      *To Prevent and Control Air Pollution from the Operation of Hot Mix Asphalt Plants*

The purpose of this rule is to establish emission limitations for hot mix asphalt plants and the plant property. The facility is subject to this rule because it meets the definition of Hot Mix Asphalt Plant as found in Section 2.14. The facility must meet visible emission limits of 40% opacity during start-up or shutdown and 20% opacity during operations of any fuel burning equipment. The facility shall be operated and maintained in a manner as to prevent emission of particulate matter from any point other than a stack outlet. The facility will utilize water sprays and baghouses to minimize particulate emissions.

**45CSR7**      *To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associate Operations*

The purpose of this rule is to prevent and control particulate matter air pollution from manufacturing processes and associated operations. The facility is subject to the requirements of this rule because it meets the definition of "Manufacturing Process" found in Section 2.20 of this rule.; Subsection 4.1 – PM emissions shall not exceed those under Table 45-7A (see paragraph below); Subsection 5.1 – manufacturing process must be equipped with a system to minimize emissions (baghouse APCD-1 control emissions from the parallel flow drum mix plant PFDM1); Subsection 5.2 – minimize PM emissions from haulroads and plant premises (water sprays will be utilized to control these emissions).

According to Table 45-7A, for a type 'a' source with a maximum process weight rate of 600,000 lb/hr, the maximum allowable emission rate is approximately 50 lb/hr of particulate matter. The proposed maximum point source emission rate at the facility is 24.19 lb/hr of particulate matter according to calculated emissions in permit application G20-B021A.

**45CSR10**      *To Prevent and Control Air Pollution from Emissions of Sulfur Oxides*

The purpose of this rule is to prevent and control air pollution from the emission of sulfur oxides. Per this rule, Section 2.9 defines an indirect heat exchanger as a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. Section 2.8 defines a fuel burning unit as any furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer. According to section 4.1., sulfur dioxide concentrations must fall below 2,000 parts per million by volume.

**45CSR13**      *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation*

The purpose of this rule is to set forth the procedures for stationary source reporting, and the criteria for obtaining a permit to construct and operate a new stationary source which is not

a major stationary source, to modify a non-major stationary source, to make modifications which are not major modifications to an existing major stationary source and to relocate non-major stationary sources within the state of West Virginia. The applicant is applying for a general Permit modification for the Alta Plant #52 facility. The facility is subject to the following sections of this rule: reporting requirements, requirements for modifications of stationary sources, demonstrating compliance with stationary sources, public review procedures, and permit application fees. The facility will demonstrate compliance by following all the applicable rules and regulations that apply to the facility. They will also follow the terms and conditions set forth in permit G20-B021A. The applicant published a Class I legal advertisement in *The West Virginia Daily News* on November 18, 2014 and submitted an application fee of \$1,500.00.

*45CSR16 Standards of Performance for New Stationary Sources*

This rule establishes and adopts standards of performance for new stationary sources promulgated by the United States Environmental Protection Agency pursuant to section 111(b) of the federal Clean Air Act, as amended (CAA). The facility is subject to 40cfr60 Subparts I and OOO.

*40CFR60 Subpart I: Standards of Performance for Hot Mix Asphalt Facilities*

The facility is subject to this Subpart because it meets the definition of “hot mix asphalt facility” as defined in 60.91(a) – hot mix asphalt facility means any facility used to manufacture hot mix asphalt by heating and drying aggregate and mixing with asphalt cements and consisting of any combination of the following: dryers; systems for screening, handling, storing, and weighing hot aggregate; systems for loading, transferring, and storing mineral filler, systems for mixing hot mix asphalt; and the loading, transfer, and storage systems associated with emission control systems.

*40CFR60 Subpart OOO: Standards of Performance for Nonmetallic Minerals Processing Plant*

In addition to nonmetallic minerals processing plants, provisions of this subpart also apply to crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart. The facility shall be in compliance with 60.672 (b) no greater than 7% opacity from any transfer point on belt conveyors or from any other affected facility (as defined in 60.670 and 60.671) and no greater than 12% opacity from any crusher when the particulate matter control methods and devices (all control methods shown in equipment table) proposed within application G20-B021A are in operation.

*45CFR60 Subpart III—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

Southern West Virginia Asphalt, Inc. is subject to this subpart because the engine was manufactured after April 1, 2006. The engine emissions for F-ENG1 is EPA Interim Tier IV Certified, Certificate Number: DJDXL06.8210-019.

*40CFR63 Subpart ZZZZ—National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

Southern West Virginia Asphalt, Inc. is subject to 40CFR63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, because F-ENG1 is considered a new area source of HAPs since it will be constructed on or after June 12, 2006, however, the only requirements that apply are those required under 45CFR60 Subpart III.

The proposed modification of Southern West Virginia Asphalt, Inc.'s existing hot mix asphalt facility is not subject to the following state and federal rules:

*45CSR14 Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration*

In accordance with 45CSR14 Major Source Determination, the proposed additions and hot mix asphalt facilities are not listed in Table 1. The facilities will have a total potential to emit 11.46 TPY of a regulated air pollutant (PM), not including fugitive emissions, which is less than the 45CSR14 threshold of 250 TPY. Therefore, the proposed construction is not subject to the requirements set forth within 45CSR14.

## TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

Small amounts of non-criteria regulated hazardous or toxic air pollutants such as benzene, ethylbenzene, toluene, xylenes and formaldehyde may be emitted during the production of hot mix asphalt. Due to the small amounts emitted, these non-criteria regulated hazardous/toxic pollutants should not adversely impact an applicable ambient air quality standard or cause or contribute to degradation of public health and welfare. A toxicity analysis would be required when the Director determines the facility may interfere with attainment or maintenance of an applicable ambient air quality standard or cause or contribute to degradation of public health and welfare.

## AIR QUALITY IMPACT ANALYSIS

The facility will not be a major source as defined by 45CSR14. Based on the nature of the emissions and the annual emission rate, no air quality impact analysis was performed.

## MONITORING OF OPERATIONS

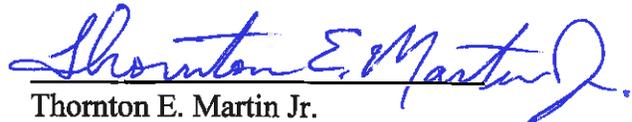
SWVA will be required to monitor and maintain records of daily and yearly asphalt production, hours of operation, water truck water usage, type and amount of fuel used in the dryer, and sulfur content of the #2 fuel oil. These records shall be maintained on site for a period of five (5) years.

## CHANGES TO PERMIT G20-B021A

- Addition of Portable Recycled Asphalt Pavement (RAP) Processing equipment to include:
  - One (1) Feed Bin
  - One (1) Triple Deck Screen
  - One (1) Hammer Mill Crusher
  - Four (4) Belt Conveyors
  - One (1) Radial Stacker
  - One (1) Diesel Engine (2013 John Deere, 173hp, Interim Tier IV Certification)

## RECOMMENDATION TO DIRECTOR

The information contained in this General Permit Registration Application indicates that compliance with all applicable state rules and federal regulations should be achieved when all of the proposed particulate matter control methods are in operation. Due to the location, nature of the process, and control methods proposed, adverse impacts on the surrounding area should be minimized. Therefore, the granting of a permit to Southern West Virginia Asphalt, Inc. for the modification of a hot mix asphalt plant to be located in Alta, Greenbrier County, WV, is hereby recommended.



Thornton E. Martin Jr.  
Permit Engineer

March 24, 2015

Date