

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: All Interested Persons | **Date:** May 7, 2012 |

Thru: Michael Wilson, P.E., Director, Air Permits Division *MW*

From: *SA* Stephanie L. Howell, P.E., Manager, Mechanical, Agricultural, and Construction Section, Air Permits Division |

Subject: Use of Additional Recycled Asphalt Products (RAP) Feed Bins and/or RAP Conveyors Under the Air Quality Standard Permit for Hot Mix Asphalt Plants |

Purpose:

To clarify the acceptable use of additional RAP feed bins and/or RAP conveyors under the Air Quality Standard Permit for Hot Mix Asphalt Plants (Standard Permit) with the effective date of July 10, 2003.

Background:

Sections 3(A) and 4(A) of the Standard Permit provide for one RAP feed bin and one RAP conveyor.

Dedicated RAP bins and/or RAP conveyors are often needed for handling recycled asphalt shingles (RAS). RAS, through a memorandum on "Recycled Asphalt Shingles (RAS) as Recycled Asphalt Products (RAP) in Hot Mix Asphalt Plants dated February 12, 2009, confirms the use of RAS in hot mix asphalt mixes and limits the use to 15% by weight of the total mix.

Conclusions:

The Air Permits Division concludes the number of RAP bins and/or RAP conveyors should not result in additional emissions or air quality impacts provided the owner or operator is operating in compliance with the Standard Permit section 1(S) limit.

The initial protectiveness analysis completed for the Standard Permit is not affected by the number of RAP bins and/or RAP conveyors. The percentage of RAP authorized is not changed from the Standard Permit Section 1(S) limit.

Recommendations:

This memorandum approves the use of additional RAP feed bins and/or RAP conveyors until the Standard Permit is amended and reissued.

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