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G.A.C. Contractors, Inc.
Gulf Asphalt
Facility ID No.: 0050008
Bay County

Air Operation Permit
Permit No.: 0050008-002-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32502-5794
Telephone: 850/595-8364
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[electronic file name: 0050008-002-ao.doc]

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Air Operation Permit
Permit No.: 0050008-002-AO

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- Appendix G-1, General Conditions
- Appendix SS-1, Stack Sampling Facilities
- Appendix AP-1, Operation and Maintenance Plan

Department of
Environmental Protection

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32502

Colleen Castille
Secretary

Permittee:
G.A.C. Contractors, Inc.

Permit No.: 0050008-002-AO
Facility ID No.: 0050008
SIC No(s).: 2951
Project: Air Operation Permit

This permit is for the operation of the G.A.C. Contractors, Inc./dba Gulf Asphalt plant located at 4116 North Highway 231, Panama City, Bay County; UTM Coordinates: Zone 16, 634.9 km East and 3343.7 km North; Latitude: 30° 13' 30" North and Longitude: 85° 34' 40" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix G-1, General Conditions
Appendix SS-1, Stack Sampling Facilities
Appendix AP-1, Operation and Maintenance Plan

Effective Date: July 22, 2004
Renewal Application Due Date: May 23, 2009
Expiration Date: July 22, 2009

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Sandra F. Veazey

Sandra F. Veazey
Air Program Administrator

SFV:ajc

Permit No.: 0050008-002-AO

Section I. Facility Information.

Subsection A. Facility Description. See Amendment dated 10/12/05

This facility consists of a 189 ton per hour Madison three-ton batch asphalt plant that uses natural gas or No. 2 fuel oil with a maximum of 0.8% sulfur. Particulate emissions are controlled by an Estee baghouse (Model ST-12-468, emission unit 001). The plant also has an asphalt heater fired with a maximum of 16 gallons per hour of No. 2 fuel oil with a maximum of 0.8% sulfur (emission unit 004, with no source specific emissions limits).

A belt conveyer transfers cold aggregate from four feeder bins to the cold end of the drum dryer. Heated aggregate is discharged from the dryer to a hot elevator, and then transferred to a screen shaker with four hot bins. The hot bins discharge into a weigh hopper, and then to the pugmill for mixing and transfer to trucks. Recycled asphalt concrete (RAP) is transferred from a recycle bin to the hot elevator at a maximum RAP usage rate of 15% of the operating rate. Heated asphalt cement is injected at the pugmill. Particulate emissions from the dryer, hot elevator, and shaker are ducted to the baghouse.

Based on the permit application received April 22, 2004, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
001	Estee baghouse for emission control of the asphalt plant
002	Asphalt cement heater

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application received April 22, 2004
Additional Information Request dated June 1, 2004
Additional Information received June 21, 2004

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.
[Rule 62-296.320(1)(a), F.A.C.]

5. An annual operating report for air pollutant emitting facility, DEP Form 62-210.900(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District office.
[Rule 62-210.370, F.A.C.]

6. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: Paving and maintenance of roads, parking areas and yards; application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities; landscaping or planting of vegetation; and enclosure or covering of conveyor systems.
[Rule 62-296.320(4)(c)2., F.A.C.]

7. When appropriate, any recording, monitoring, or reporting requirements that are time specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department.
[Rule 62-4.090, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32502-5794
Telephone: 850/595-8364; Fax: 850/595-8096

Notification of compliance testing may be submitted by electronic mail to nwdair@dep.state.fl.us. A copy of all compliance related notifications shall be sent to the Northwest District Branch Office in Panama City at 2353 Jenks Ave, Panama City FL 32402.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850/595-8364, extension 1220, day or night, and for emergencies involving a significant threat to human health or the environment is 800/320-0519. For routine business, telephone 850/595-8364, then press 7, during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

11. Operations and Maintenance Plan (O&M). This plan outlines the procedures the permittee incorporates during the normal operation of this facility and provides necessary assurance that the facility will operate in compliance. The permittee shall follow all procedures outlined in the most recently approved O&M Plan (Appendix AP-1).
[Rule 62-4.070, F.A.C.]

{Permit Note: An O&M plan should be a living document that provides procedures to help in maintaining the subject facility in compliance with applicable air regulations. Keeping this document up to date with the facility's current activities will not require any permit action; however, such modifications shall be submitted to the Department for approval. This does not alleviate the facility from the air construction permitting requirements for facility modifications per Rule 62-210.300(1)(a), F.A.C.}

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
001	Estee baghouse for emission control of the asphalt plant

This emissions unit consist of a baghouse (Estee Model ST-12-468) that provides emissions control for the 189-ton per hour batch asphalt plant (Madison, three-ton batch). The facility predates and is not subject to the requirements of 40 CFR 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities, but is subject to the General Pollutant Emission Limiting Standards contained in Rule 62-296.320, F.A.C., including the Process Weight Table.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The maximum allowable operating rate of this asphalt concrete plant is 189 tons of asphalt concrete mix produced per hour. The maximum allowable operating rate may be decreased in accordance with specific condition **A.7.c.**
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Production. The production rate of asphalt concrete shall not exceed 500,000 tons in any consecutive twelve-month period. Records of fuel oil usage shall be maintained as required by specific condition **A.11.**
[Rules 62-4.160(2), 62-210.200(PTE), and 62-210.300(3)(c)1.a., F.A.C.]

A.3. Hours of Operation. The maximum hours of operation are 2,500 hours per year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.4. Methods of Operation. The fuel oil usage by the asphalt plant (and the Asphalt Heater) shall not exceed the Title V exemption limit (Rule 62-210.300(3) (c)1.b, F.A.C.) of 1.2MMgallons in any consecutive twelve-month period. The facility may operate using No. 2 fuel oil, or natural gas with a maximum sulfur content of 0.8 percent by weight or less. The owner shall maintain records to demonstrate that each shipment of fuel oil has 0.8 percent or less sulfur and that the sulfur content was determined by ASTM methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294- 90, adopted and incorporated by reference in Rule 62- 297.440(1), F.A.C. Records of fuel oil usage shall be maintained as required by specific condition **A.11.**
[Rules 62-210.300(3)(c)1.b, and 62-210.300(3)(c)1.c, F.A.C.]

Emission Limitations and Standards

A.5. Particulate Matter. Particulate emissions shall not exceed 35.43 pounds per hour averaged over a three-hour period while operating between 88 tons per hour and 189 tons per hour. At lesser operating rates, the particulate emissions shall not exceed the amount allowed by Rule 62-296.320(4)(a), F.A.C. – the Process Weight Table.
[Rules 62-210.300(3)(c)1.d, and 62-204.800(7)(b)12., F.A.C.]

A.6. Visible Emissions. Visible emissions shall be less than 20% opacity.
[Rule 62-210.300(3)(c)1.f, F.A.C.]

Test Methods and Procedures

A.7.a. Visible Emissions and particulate matter tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The VE test shall be conducted in accordance with DEP Method 9 and the PM tests shall be conducted in accordance with EPA Method 5 or 5A. The tests shall be conducted once during each federal fiscal year (October 1 through September 30). The VE test shall be conducted during one of the PM test runs. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.
[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.7.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.
[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.7.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.
[Rules 62-297.310(2) and 62-4.070, F.A.C.]

A.8. Determination of Process Variables.

(a) Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

(b) Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.
[Rule 62-297.310(5), F.A.C.]

A.9. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emission unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rules 62-297.310(7)(b) and 62-297.620(4), F.A.C.]

A.10. Required Stack Sampling Facilities. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.
[Rule 62-297.310(6), F.A.C.]

Record Keeping and Reporting Requirements

A.11. The owner or operator shall maintain records to document the monthly and the twelve-month rolling totals of tons of asphaltic concrete produced, the gallons of fuel oil consumed (with proper sulfur content verification records per Specific Condition **A.4**), and the hours of operation. Such records shall be available for inspection and retained for five years.
[Rules 62-4.070 and 62-210.300(3)(c)1.g., F.A.C.]

Subsection B. This section addresses the following emissions unit.

E.U. ID No.	Brief Description
002	Asphalt heater

This emissions unit consists of an asphalt heater fired with a maximum of 16 gallons per hour of No. 2 fuel oil with a maximum of 0.8% sulfur by weight. This emissions unit has no source specific emission limits and is subject only to general pollutant limiting standards (see Section II, Facility-Wide conditions, and appendix G-1, General Conditions.)

The following specific conditions apply to the emissions unit listed above:

B.1. Fuel oil consumption shall not exceed 16 gallons per hour of No. 2 fuel oil with a maximum of 0.8% sulfur content. Fuel oil consumption shall be included in the record keeping required by condition **A.11**. The owner shall maintain records to demonstrate that each shipment of fuel oil has 0.8 percent or less sulfur and that the sulfur content was determined by ASTM methods ASTM D4057-88 and ASTM D129-91, ASTM D2622-94 or ASTM D4294- 90, adopted and incorporated by reference in Rule 62- 297.440(1), F.A.C
[Rules 62-210.300(3)(c)1.b, and 62-210.300(3)(c)1.c, F.A.C.]

B.2. Hours of Operation. The maximum hours of operation are 3,640 hours per year. The Permittee shall maintain an operation log available for Department inspection certifying the total hours of operation annually.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; permit AO20-242835, issued September 2, 1994]

See amendment dated 8 of 12, 2005

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project that are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

a. Having access to and copying any records that must be kept under the conditions of this permit;

b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,

c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent

recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law that is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

APPENDIX SS-1, STACK SAMPLING FACILITIES (version dated 10/07/96)

Stack Sampling Facilities Provided by the Owner of an Emissions Unit. This section describes the minimum requirements for stack sampling facilities that are necessary to sample point emissions units. Sampling facilities include sampling ports, work platforms, access to work platforms, electrical power, and sampling equipment support. Emissions units must provide these facilities at their expense. All stack sampling facilities must meet any Occupational Safety and Health Administration (OSHA) Safety and Health Standards described in 29 CFR Part 1910, Subparts D and E.

(a) Permanent Test Facilities. The owner or operator of an emissions unit for which a compliance test, other than a visible emissions test, is required on at least an annual basis, shall install and maintain permanent stack sampling facilities.

(b) Temporary Test Facilities. The owner or operator of an emissions unit that is not required to conduct a compliance test on at least an annual basis may use permanent or temporary stack sampling facilities. If the owner chooses to use temporary sampling facilities on an emissions unit, and the Department elects to test the unit, such temporary facilities shall be installed on the emissions unit within 5 days of a request by the Department and remain on the emissions unit until the test is completed.

(c) Sampling Ports.

1. All sampling ports shall have a minimum inside diameter of 3 inches.
2. The ports shall be capable of being sealed when not in use.
3. The sampling ports shall be located in the stack at least 2 stack diameters or equivalent diameters downstream and at least 0.5 stack diameter or equivalent diameter upstream from any fan, bend, constriction or other flow disturbance.
4. For emissions units for which a complete application to construct has been filed prior to December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 15 feet or less. For stacks with a larger diameter, four sampling ports, each 90 degrees apart, shall be installed. For emissions units for which a complete application to construct is filed on or after December 1, 1980, at least two sampling ports, 90 degrees apart, shall be installed at each sampling location on all circular stacks that have an outside diameter of 10 feet or less. For stacks with larger diameters, four sampling ports, each 90 degrees apart, shall be installed. On horizontal circular ducts, the ports shall be located so that the probe can enter the stack vertically, horizontally or at a 45 degree angle.
5. On rectangular ducts, the cross sectional area shall be divided into the number of equal areas in accordance with EPA Method 1. Sampling ports shall be provided which allow access to each sampling point. The ports shall be located so that the probe can be inserted perpendicular to the gas flow.

(d) Work Platforms.

1. Minimum size of the working platform shall be 24 square feet in area. Platforms shall be at least 3 feet wide.
2. On circular stacks with 2 sampling ports, the platform shall extend at least 110 degrees around the stack.
3. On circular stacks with more than two sampling ports, the work platform shall extend 360 degrees around the stack.
4. All platforms shall be equipped with an adequate safety rail (ropes are not acceptable), toeboard, and hinged floor-opening cover if ladder access is used to reach the platform. The safety rail directly in line with the sampling ports shall be removable so that no obstruction exists in an area 14 inches below each sample port and 6 inches on either side of the sampling port.

(e) Access to Work Platform.

1. Ladders to the work platform exceeding 15 feet in length shall have safety cages or fall arresters with a minimum of 3 compatible safety belts available for use by sampling personnel.

2. Walkways over free-fall areas shall be equipped with safety rails and toeboards.

(f) Electrical Power.

1. A minimum of two 120-volt AC, 20-amp outlets shall be provided at the sampling platform within 20 feet of each sampling port.

2. If extension cords are used to provide the electrical power, they shall be kept on the plant's property and be available immediately upon request by sampling personnel.

(g) Sampling Equipment Support.

1. A three-quarter inch eyebolt and an angle bracket shall be attached directly above each port on vertical stacks and above each row of sampling ports on the sides of horizontal ducts.

a. The bracket shall be a standard 3 inch x 3 inch x one-quarter inch equal-legs bracket which is 1 and one-half inches wide. A hole that is one-half inch in diameter shall be drilled through the exact center of the horizontal portion of the bracket. The horizontal portion of the bracket shall be located 14 inches above the centerline of the sampling port.

b. A three-eighth inch bolt which protrudes 2 inches from the stack may be substituted for the required bracket. The bolt shall be located 15 and one-half inches above the centerline of the sampling port.

c. The three-quarter inch eyebolt shall be capable of supporting a 500 pound working load. For stacks that are less than 12 feet in diameter, the eyebolt shall be located 48 inches above the horizontal portion of the angle bracket. For stacks that are greater than or equal to 12 feet in diameter, the eyebolt shall be located 60 inches above the horizontal portion of the angle bracket. If the eyebolt is more than 120 inches above the platform, a length of chain shall be attached to it to bring the free end of the chain to within safe reach from the platform.

2. A complete monorail or dualrail arrangement may be substituted for the eyebolt and bracket.

3. When the sample ports are located in the top of a horizontal duct, a frame shall be provided above the port to allow the sample probe to be secured during the test.

[Rule 62-297.310(6), F.A.C.]

GAC Contractors
4116 N. Hwy 231
Panama City, FL 32404

PLANT OPERATIONS & MAINTENANCE PLAN (O&M)
Facility ID No. 0050008

June 16, 2004
INCLUDES 7/20/04 UPDATES

RECEIVED
JUN 21 2004
NORTHWEST FLORIDA
DEP

Introduction

This plan provides information demonstrating GAC's commitment to operating our facility in compliance with DEP Operation Permit requirements and provides assurance that the operation of this facility will be in accordance with all applicable laws and rules.

This plan was developed in accordance with specific requirements of this facility and provides our management and operator(s) with adequate information and description regarding the design, operation and maintenance features of our facility. It is used in conjunction with plant operation/maintenance manuals supplied by the equipment manufacturers to train new plant operator(s) and provide continuous education.

Corporate Commitment

GAC Contractors adheres to a strong company-wide environmental program. The company relies on our past experience to assure quality plant operation and employee training, as well as protection of the surrounding environment.

It is the company's belief that a strong environmental commitment from all team members, especially top management, is what gets the job done.

Operator Training

Our existing plant operator has been with the company for many years. In addition, we have experienced back-up operators who can operate the plant if necessary.

Besides periodic reviewing of Compliance Plan with plant operator(s), management also periodically reviews our DEP Operation Permit with plant operator(s). Although every detail of operation permit is important, following details stand out:

1. Plant is permitted to operate at maximum hourly rate of 189 TPH.

2. Both, dryer burner and AC heater are allowed to use either No. 2 distillate oil with maximum sulfur content of 0.8% or natural gas. Sulfur content in fuel oil must be determined using ASTM methods ASTM D4057-88 and ASTM D129-91, ASTMD2622-94 or ASTM D4-294-90.

3. Compliance tests will be conducted *during the federal fiscal year of October 1st to September 30th*.

4. Maximum yearly asphalt production is limited to 500,000 TPY

5. Maximum fuel usage is limited to 1,200,000 gal/yr of no.2 distillate

6. Annual Operating Reports are due by March 1st.

To insure compliance, our plant operator completes the attached checklist monthly for management.

Yearly training sessions are held to cover plant operation, safety, compliance with DEP Operation Permit and other environmental issues such as prevention of fugitive dust emissions and prevention of material spills throughout plant property.

Plant Monitoring

This section establishes the use of parameters to monitor plant operation such as pressure differentials and visible emissions. GAC conducts reasonable monitoring to assure continued compliance with the terms and conditions of the permit. Monitoring is carried out in the manner prescribed in this procedure.

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

Bag pressure drop

Exhaust airflow rate (established during EPA Method 5 compliance test)

Air to cloth ratio

Bag weave

Bag material

Bag cleaning conditions

Pulsing sequence and air pressure

The operating protocol addresses the physical steps and procedures to be followed by the operator when monitored parameters are outside the typical operating range established for this facility since initial startup. A magnehelic differential pressures gauge monitors proper operation of baghouse dust collector. Sudden decrease in pressure across filtering media (bags) represents a system leak. Sudden rise in pressure represents plugging problems. Magnehelic gauge indicates the pressure differential across the filter elements in inches of water.

All asphalt plants create particulate emissions while aggregate and sand are dried in a dryer. In order to meet Federal and State air quality codes, emission control equipment consisting of exhaust hood(s), ductwork, baghouse and exhaust blower is employed. As air laden with dust is captured at points of emissions, it is conveyed through a system of ductwork to the baghouse, which filters particulate from the air. Clean air is then exhausted by exhaust blower and released into atmosphere. During dust filtering operation, particulate matter is collected by filtering bags causing a reduction in dust emissions. In order to keep dust from building up on filter bags, a cyclic timer periodically actuates the solenoid valves that deliver momentary surges of high-pressure air. These surges are discharged through orifices located above each bag causing a reverse flow of air through the bag for cleaning purposes. Cleaning (blowing) of bags is done in sequence controlled by a timer so that not all bags are blown at the same time. Instead, timer is sequenced to deliver bursts to one or several bags at one time. This

assures that baghouse continues to operate uninterrupted without disrupting filtering process.

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

Pressure drop (Delta P) across baghouse

Visible emissions

Pressure drop across the baghouse at this facility during normal operation and during emissions test are typically around 4.75 WG.

A pressure drop lower than 4 WG could indicate:

New bags, which have not developed a filter cake

Bag failure

Baghouse or ductwork structural failure

A pressure drop higher than 6 could indicate:

Plugged bags or ductwork

Blocked stack

Fan malfunction

Operation and Maintenance Plan

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

The O & M Plan includes procedure for start-up, daily monitoring and inspection of the baghouse and dust collection system, weekly, monthly and annual maintenance required for the above.

Start-up of Baghouse

Start all electric drive components to ensure proper rotation

Start air compressor to ensure proper air pressure is reached for cleaning cycle.

Start exhaust fan and check differential pressure magnehelic gauge.

Preheat baghouse to 250-300 F before aggregate is discharged into dryer. This should be done first thing in the morning and then again only after prolonged shutdowns during the day (30 minutes or more).

Minimum inlet temperature to baghouse should never be allowed to fall below 220 F or condensation may occur inside the baghouse causing bag mudding or blinding with a result of very high static pressures and loss of adequate draft for proper dryer operation.

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 start-up. Also, the dust auger could be stalled if slugged with cold, wet dust.

Daily monitoring and checks of baghouse and auxiliary equipment

Record baghouse differential pressure reading. Differential pressure reading should read around 4.75 inches water gauge ("WG)

If readings exceed 6"WG, operator needs to rectify the problem immediately by determining the reason for high reading and take corrective actions after checking the accuracy of the gauge.

First determine that the gauge is not malfunctioning by performing the following:

Disconnect both lines leading to gauge and see if gauge reads "O". If not, use set screw to reset gauge to "O".

While lines are still disconnected, blow both lines with compressed air (pressures no higher than 30 PSIG)

Reconnect lines and check reading.

If reading is still high, the problem is in the baghouse or ductwork as described in Plant Monitoring section.

If the gauge reading is lower that 4" WG, check gauge as described above. If readings are still low, the problem is in the baghouse or ductwork as described in Plant Monitoring section.

Perform visual inspection of the plume from the baghouse stack. If at anytime a constant stream of dust is observed from fan stack, check for a mechanical leak or work or torn bag(s). If a leak develops, the area can usually be easily spotted from the clean air side by a large deposit of dust around the leak area. Should a leak develop, clean dust from area and reseal both sides of leak with high temperature silicone sealant. Our plant operator knows how to distinguish between vapor/moisture plume and actually opacity which represents dust in plume. Vapor will be present on cold days, when moisture in the plume is condensing.

Check baghouse pulsating system and determine if it functions correctly.

Check baghouse dust hopper and auger conveying system to make sure it operates properly.

Record dryer burner start-up and shutdown times.

Record total production.

All above checks and data will be recorded on plant daily log. Sample of daily log attached.

Other Inspections

To insure that the asphalt plant equipment is functioning in accordance with all of the permit requirements, the attached monthly maintenance report will be completed.

Facility Inspection

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

Inspection of the baghouse and dust collection equipment is conducted by a fully trained team member with direct access to senior management. Inspections are conducted weekly, monthly, semi-annually, and annually as shown on the attached report.

Records

Records of monitoring, inspections and maintenance data of baghouse and auxiliary equipment are stored in either the plant operator's control room or at our Company's Main Office for a minimum of two years and shall be made available to DEP upon request.

Following documents are on file:

Copy of current DEP operations permit

Log(s) of daily recordings as listed in O & M Plan

Copy of fuel analysis stating percentage of sulfur

Copy of this Compliance Plan

Notes taken during training sessions

Records of weekly, monthly, semi-annual and annual plant inspections

Copy of Manufacturer Operation and Maintenance Manuals

Maintenance records on the baghouse and associated equipment, structural repairs, gabs and motor(s) replacements

Records of malfunctions or failures of the above and corrective actions taken.

Results of last compliance test

Periodic Plan Review

This Environmental Compliance Plan will be reviewed at least annually. This review includes evaluation of the effectiveness of the plan and incorporates changes necessary for the plan to be continuously administered.

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

Abnormal Events

In the event GAC is temporarily unable to comply with any of the conditions of their DEP permit due to breakdown of equipment, power outages, and destruction by hazard of fire, wind, or other cause, they will notify DEP. Notifications shall be made in person, by telephone, or by other means within 24 hours of breakdown or malfunction to the Pensacola office of Florida Department of Environmental Protection. Phone number (850) 595-8365, extension 1220, day or night.

A written report of any noncompliance referenced above shall be submitted to the Pensacola office of DEP (160 Governmental Center, Pensacola, FL 32501-5794) within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, steps being taken or planned to be taken to correct the problem and prevent it's reoccurrence, emergency procedures in use pending correction of problems and the time when 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 emission control components or results in non-compliance with applicable regulations, the operator will:

Stop production immediately

Notify main office

Ensure that the emission control components are in good working order before resuming production.

Daily Asphalt Plant Log
Highway 231 Plant

Date: _____

Times of Production

Start	End

Total Asphalt Produced: _____

Baghouse Differential Pressure: _____

Stack Visual Inspection: _____

Baghouse Pulse System checked: _____
Amount of Compressed Air: _____

Auger System Checked: _____

Inspection Key:
0 = Ideal, normal
1= Light Steam(white), normal at start-up, light medium on humid or cold days
2= Heavy Steam (white), start up on humid or cold days
3=Barely visible light blue/grey
4= Any other color or dust visible (Shut down immediately)

MONTHLY PLANT MAINTENANCE REPORT

Month:_____
(Write in the actual date that the following were accomplished)

Weekly Checklist

1. Check equipment guards (weekly). _____

2. Inspect all tanks in tank farm area for leaks (weekly). _____

3. Inspect all conveyors, bearings, idlers, guards and no flow switches on cold feed bins (weekly). _____

4. Clean strainers and filters in fuel system (weekly). _____

Bi-weekly Checklist

5. Check fugitive dust return lines to baghouse for blockage (2 weeks). _____

6. Check burner valves and linkages to insure that they are operating freely (2 weeks). _____

Monthly Checklist

7. Check valves on pulse jets (monthly). _____

8. Check all connectors (hose, clamps, etc.) and blow pipe holes for wear (monthly). _____

9. Check the flights inside the dryer for wear (monthly). _____

10. Check trunnions & dryer chain for wear (monthly). _____

11. Inspect screens for wear in shaker deck (monthly). _____

12. Check oil in all gear boxes (monthly). _____

13. Check AC pumps & hot oil system (monthly). _____

14. Check for wear on all braided hoses both hot oil & AC (monthly). _____

15. Check wastewater equipment, steam cleaner & keep track of hydrogen peroxide inventory (monthly). _____

Bi-monthly Checklist

16. Clean burner nozzle & tube (2 months). _____

17. Inspect pugmill for paddle, shafts & linear wear. All tips shall be within 1" of liner (2 months). _____

18. Inspect chain wear & bearings on hot elevator (2 months). _____

Periodic Inspections

19. Review the amount of fugitive dust from the plant and also from the plant yard daily. Take appropriate action as necessary.

20. Pump out & remove soils from water storage area of the water recycling unit (3 months).

21. Change oil in pugmill gear box (4 months) _____

22. Change oil in gear box (once a year). _____

23. Replace check valves on pulse jets (five years). _____

Misc.

24. Monthly fuel usage as shown by the attached. _____

25. Tons of asphalt produced in month. _____

26. Cumulative tonnage for year. _____

27. Quality factor for month (goal is 95.0). _____

28. Cumulative Quality factor for year (goal is 95.0). _____

29. Date that truck scale certification elapses. _____

30. Date that plant scale certification elapses. _____

31. Liquid asphalt factor for the month as shown by attached. _____

32. Landfill – Is there any debris stockpiled that is not in accordance with FDEP requirements? _____

33. Write any general comments, items which need attention or suggestions for improvements.

PERMITTING

34. Baghouse test must be performed between Oct 1st to Sept. 30th _____

35. FDEP annual report is due by March 1st of each year. _____

36. FDEP air permit expires June 30, 2009 – Update by April 30, 2009. _____

Submitted By: _____
Date: _____

CC: Richard, Derwin Ernie, Billy