595-8096

OFFICE: (850) 769-3477
FAX: (850) 769-3456

GAC

POST OFFICE BOX 59462
PANAMA CITY, FL 32412-0462

FACSIMILE TRANSMISSION COVER SHEET

TO: Ms Jackson FAX: _____

FROM: Richard Dodd DATE: 7/20/04

Total page(s) including cover sheet: 3

Message: _____

Urgent _____ Please reply _____

For review ____ Please comment ____

Signed: _____

Please call if transmission is unclear or if you have not received all pages.

The information contained in this facsimile is confidential and may also be subject to the attorney client privilege or may constitute privileged work product. The information is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, or the agent or employee responsible to deliver it to the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this facsimile in error, please immediately notify us by telephone and return the original message to us at the address listed above via the U.S. Postal Service. Thank you.

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.

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

KW 6/28/04

OFFICE: (850) 769-3477
FAX: (850) 769-3456

GAC CONTRACTORS

POST OFFICE BOX 59462
PANAMA CITY, FL 32412-0462

June 16th, 2004

Mr. Kevin Parker, P.E.
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, Florida 32502-5794

Dear Mr. Parker:

As a follow-up to your June 1st letter regarding the extension of our air permitting report, attached is our Operations and Maintenance Plan for the FDEP's consideration.

If additional information is needed, please don't hesitate to contact me at your convenience.

Sincerely,

Richard M. Dodd, P.E.
Dodd@GACcontractors.com
President

RECEIVED
JUN 21 2004
NORTHWEST FLORIDA
DEP

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

FILE COPY

Department of Environmental Protection

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Colleen M. Castille
Secretary

June 1, 2004

Mr. Richard M. Dodd, President
G.A.C. Contractors, Inc.
4116 North Highway 231
Panama City, Florida 32404

Dear Mr. Dodd:

This is to acknowledge receipt of your application and additional information, file number 0050008-002-AO, for the Batch Mix Asphalt Plant located at 4116 North Highway 231 in Panama City, Bay County. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your application for permit is incomplete. Please provide an Operations and Maintenance Plan (O&M Plan), addressing operator training, frequency and scope of permittee-conducted inspections and/or maintenance, record keeping, operational parameters of equipment, and general practices to remain in compliance. The O&M plan is a living document that provides an opportunity for the facility to have input into the permitting of their facility, and the steps that they will take to maintain, and provide reasonable assurance the facility is in compliance with applicable air regulations. A representative example of an O&M plan, and example inspection/preventative maintenance forms are enclosed. The following specific items should be addressed in the plan due to past compliance problems or inspection recommendations:

- Although your current operating permit states that the baghouse shall maintain a pressure drop of 5 inches water column, previous compliance inspections indicate a fluctuation in pressure. Therefore, your O&M plan should indicate the proper operating range of the baghouse (i.e., pressure drop range), inlet flow rate, and any visible emissions, by various checks/inspections and documentation (performed at least once daily during batching operations). If any of these parameters are not met, the O&M plan should address the corrective actions to be taken within a designated time frame.
- Record keeping requirements (fuel oil sulfur content, etc.)
- Denote the facility's operational practices to control unconfined emissions/fugitives from the facility, both from equipment and facility grounds (yard).

If you have any questions, please contact Angelia Jackson at 850/595-8364, extension 1229 or angelia.jackson@dep.state.fl.us.

Sincerely,

Kevin M. White, P.E.
Air Permitting Supervisor

KMW:ajc

Encl: Sample O&M Plan and inspection/preventative maintenance forms
cc: DEP NWD Branch Office, Panama City

Department of Environmental Protection

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Colleen M. Castille
Secretary

PERMIT DATA FORM DATE: 5-6-04

PROJECT SOURCE NAME GAC

TYPE CODE AIR SUBCODE

CORRECT FEE 750

AMOUNT RECEIVED 750

AMOUNT TO BE REFUNDED

PROCESSOR

Additional fee

COMMENTS:

PERMIT APPLICATION SITE NUMBER AIR 0050008-002-AO

WAFER SITE NUMBER

ARMS SITE NUMBER

CASH RECEIVING RECEIPT NUMBER 457178

CHECK SUBMITTED BY: Mac

CHECK# 038532

Cash Receiving Application - Collection Point Log Remittance

Collection Point Log Remittance

CRAF006A

AREA: NWD

Total: $5,500.00

Remittance: 564780 Type*: C Received Date*: 05/06/2004 Status: RECEIVED

SYS$RCPT: 457178 PNR: Check#*: 038532 Amount*: 750.00

SSN/FE#: Name*: GAC CONTRACTORS

First: Middle: Title: Suf:

Address1: P O BOX 59462 Short Comments

Address2: 0050008002 - MBC

City: PANAMA CITY ST: FL Zip: 32412 Country:

PAYMENT(S)

Payment#	Distr CL Area	Object Code/Description		Payment Amount	Reference#	Applic/ Fund *		status
614965	NWD	002223	AIR OPERATE	$750.00	0050008002	ARM	PFTF	COMPLETE

COMMIT FREQUENTLY $750.00 Payment total

Department of Environmental Protection

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Colleen M. Castille
Secretary

PERMIT DATA FORM DATE: 4-22-04

PROJECT SOURCE NAME GAC Contractors

TYPE CODE AIR SUBCODE AO ZA

CORRECT FEE $1500

AMOUNT RECEIVED 1500

AMOUNT TO BE REFUNDED

PROCESSOR ANGELA JACKSON

COMMENTS:

Check w/ Compliance to Discuss Possible Compliance Issues.

Verify if Heater can be Exempted. If so make sure we mark the EU as Exempt in Arms.

PERMIT APPLICATION SITE NUMBER AIR 0050008-002-AO

WAFER SITE NUMBER

ARMS SITE NUMBER

CASH RECEIVING RECEIPT NUMBER 455710

CHECK SUBMITTED BY: GAC Cont

CHECK# 638207

Permitting Application - Permit Detail and Log Permit

ARMS Facility

POINT | AIRS ID 0050008 | STATUS A | OFFICE NWDP | NW Br: PANAMA CITY

SITE NAME GULF ASPHALT CORPORATION | COUNTY BAY

OWNER/COMPANY G.A.C. CONTRACTORS INC.

Project

AIR Permit # - - | Project # 002 | CRA Reference # 180266

Permit Office NWD (DISTRICT) | Agency Action Pending

Project Name GAC CONTRACTORS DBA GULF ASPHA | Desc Gulf Asphalt renewal

Type/Sub/Des AO / 2A Minor Source - Stack Sample $1500 | Logged 04/23/2004

Received 04/22/2004 | Issued | Expires | OGC

Fee 2250.00 | Fee Recd 2250.00 | Dele | Override MULTIPLE SOURCE

Related Party

Role APPLICANT | Begin 04/23/2004 | End

Name DODD, RICHARD | Company G.A.C. CONTRACTORS, INC.

Address 4116 US NORTH HIGHWAY 231

City PANAMA CITY | State FL | Zip 32404 - | Country USA

Phone 850-769-3477 | Fax 850-769-3456

Processors

Processor JACKSON_A | Y | Active 04/23/2004 | Inactive | Events

Permitting Application - Permit Detail and Log Permit

ARMS Facility

POINT | AIRS ID 0050008 | STATUS A | OFFICE NWDP | NW Br: PANAMA CITY

SITE NAME GULF ASPHALT CORPORATION | COUNTY BAY

OWNER/COMPANY G.A.C. CONTRACTORS INC.

Project

AIR Permit # - - | Project # 002 | CRA Reference # 180266

Permit Office NWD (DISTRICT) | Agency Action Pending

Project Name GAC CONTRACTORS DBA GULF ASPH/ | Desc Gulf Asphalt renewal

Type/Sub/Des AO / 2A Minor Source - Stack Sample $1500 | Logged 04/23/2004

Received 04/22/2004 | Issued | Expires | OGC

Fee 1500.00 | Fee Recd 1500.00 | Dele | Override NONE

Related Party

Role APPLICANT | Begin 04/23/2004 | End

Name DODD, RICHARD | Company G.A.C. CONTRACTORS, INC.

Address 4116 US NORTH HIGHWAY 231

City PANAMA CITY | State FL | Zip 32404 - | Country USA

Phone 850-769-3477 | Fax 850-769-3456

Processors

Processor JACKSON_A | Y | Active 04/23/2004 | Inactive | Events

Cash Receiving Application - Collection Point Log Remittance

Collection Point Log Remittance

CRAF006A

AREA: NWD

Total: $17,900.00

Remittance: 563259 Type*: C Received Date*: 04/22/2004 Status: RECEIVED

SYS$RCPT: 465710 PNR: Check#*: 038207 Amount*: 1,500.00

SSN/FEI#: Name*: GAC CONTRACTORS INC

First: Middle: Title: Suf:

Address1: P O BOX 59462 Short Comments:

Address2: 0050008002 - MBC

City: PANAMA CITY ST: FL Zip: 32412 0462 Country:

PAYMENT(S)

Payment#	Distr CL Area	Object Code/Description		Payment Amount	Reference#	Applic/ Fund *		status
612884	NWD	002223	AIR OPERATE	$1,500.00	0050008002	ARM	PETF	COMPLETE

COMMIT FREQUENTLY $1,500.00 Payment total

OFFICE: (850) 769-3477
FAX: (850) 769-3456

GAC CONTRACTORS

POST OFFICE BOX 59462
PANAMA CITY, FL 32412-0462

May 5, 2004

Mr. Kevin White, P.E.
Florida Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32501-5794

Subject: Permit No.: 0050008-001-AO
Facility ID No.: 0050008
Project: Air Operation Permit
Renewal Application
Additional Information
Expiration Date: June 30, 2004

Dear Mr. White:

Enclosed please find additional emissions unit information (4 copies) and the $750.00 fee for the asphalt heater. We requested an exemption of this heater in our renewal application; however, in the telephone conversation with Ms. Angelia Jackson, she informed us that the permit requirements are based on 8,760 hours per year instead of the maximum hours of 3,640 per year.

If any additional information is required, please contact us.

Sincerely,

Joe Dodd

Enclosures

CC: Ms. Angelia Jackson – FDEP Pensacola, FL

RECEIVED
MAY 06 2004
NORTHWEST FLORIDA
DEP

Emissions Unit ID 005 08 - 002

III. EMISSIONS UNIT INFORMATION

A separate Emissions Unit Information Section must be completed for each emissions unit addressed in this Application for Non-Title V Air Permit Renewal. If submitting the form in hard copy, indicate, in the space provided at the top of each page, the Emissions Unit ID of the emissions unit addressed on the page, as given in the unit's most current air operation permit.

Emissions Unit Description and Status

1. Description of Emissions Unit Addressed in This Section (limit to 60 characters): Asphalt heater	
2. Emissions Unit Status Code: A02C	3. Long-Term Reserve Shutdown Date:
4. Control Equipment Method/Description (limit to 200 characters per device or method): This emissions unit consists of a heater fired with No. 2 fuel oil.	

Emissions Unit Operating Capacity and Schedule

1. Maximum Heat Input Rate:			mmBtu/hr
2. Maximum Incineration Rate:	lb/hr		tons/day
3. Maximum Process or Throughput Rate:	16 gal/hr of No 2 fuel oil		
4. Maximum Production Rate:			
5. Requested Maximum Operating Schedule:			
	hours/day		days/week
	weeks/year	3,640	hours/year

Emissions Unit ID C-2

Emissions Unit Supplemental Requirements

1. Fuel Analysis or Specification [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested	
2. Compliance Test Report [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Previously submitted, Date:_____	
3. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested	
4. Operation and Maintenance Plan [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested	
5. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [ ] Not Applicable	

Emissions Unit Comment

Department of Environmental Protection

FILE COPY

Jeb Bush
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32502-5794

Colleen M. Castille
Secretary

April 30, 2004

Richard M. Dodd, P.E., President
GAC Contractors, Inc., dba Gulf Asphalt
4116 US Highway 231 North
Panama City, Florida 32404

Dear Mr. Dodd:

This is to acknowledge receipt of your application, file number 0050008-002-AO, to renew permit for the GAC Contractors, Inc., Batch Asphalt Concrete Plant. The application also included a letter dated April 21, 2004 requesting an exemption for the asphalt heater for the Batch Mix Asphalt Plant. This letter constitutes notice that a permit will be required for your project pursuant to Chapter 403, Florida Statutes.

Your letter identified the asphalt heater as an emissions source that is fired with a maximum of 16 gallons per hour of No. 2 fuel oil with a maximum of 0.8% sulfur content, by weight, with 3,640 hours per year maximum hours of operation. Based on these specific conditions, your facility is requesting a generic exemption per Rule 62-210.300(3)(b), F.A.C. There were no additional fees included with this renewal application for the asphalt heater.

Based on the submitted information, it is the Department's determination that the asphalt heater is not exempt from the requirements of permitting. State Rule 62-210.300(3)(b), F.A.C., clearly states in order to meet the generic emissions unit exemption, the emission unit would neither emit, nor have the potential to emit 5.0 tons per year (TPY) or more of any other regulated pollutant. Based on the Department's calculations shown below, your asphalt heater has the potential to emit (PTE) greater than 5.0 TPY, and therefore cannot be exempted from the requirements of permitting.

- (16 gal/hr)(8760 hr/yr)(126 lbs/kgal) (1 ton/2000 lbs)(1 gal/1000 kgal) = 8.83 TPY SO2
  AP-42 (1.3-1 Fuel Oil Combustion - Distillate Oil)

  Or stoichiometric

- (16 gal/hr)(8760 hrs/yr)(7.206 lbs/gal)(0.008 S)(2 SO2/S)(1ton/2000 lbs) = 8.08 TPY SO2

The overall intent of the PTE is to determine the facility category for permitting purposes and to provide reasonable assurance that the facility has applied for the correct emissions level for fee purposes. As an alternative, you may request a sulfur content reduction limit on your operations in order to limit emissions.

The application included a fee of $1500, which is appropriate for a single emission unit that requires stack testing. However, the facility also includes an asphalt heater, which is an emission unit with no source specific standards, but does require an additional fee of $750 (Type 2C emission unit, minor source, no sample). The Department cannot take further action with this application until an additional $750 has been submitted.

If you have any questions, please contact Angelia Jackson at 850/595-8364, extension 1229 or angelia.jackson@dep.state.fl.us.

Sincerely,

Sandra F. Veazey

Sandra F. Veazey
Air Program Administrator

SFV:ajc
cc: DEP Northwest District Branch Office, Panama City