MEMORANDUM

TO : Ed K. Middleswart, P.E. Ed M
FROM : Andy Allen, Bob Kriegel 6/29
DATE : 06/29/99
SUBJECT : **Evaluation Summary for G.A.C. Contractors, Inc., Gulf Asphalt 0050008-001-AO, Bay County**

We recommend issuing a renewal operation permit to G.A.C. Contractors, Inc. to operate their Gulf Asphalt batch asphalt plant located on US231 approximately 1 ½ miles northeast of Panama City.

Process Description

This facility consists of a 189 ton per hour batch asphalt plant (Madison, three ton batch) which uses natural gas or no. 2 fuel oil with a maximum of 0.8% sulfur. 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 emission limits).

Pollution Control Equipment

Particulate emissions are controlled by an Estee baghouse (Model ST-12-468, emission unit 001).

Environmental Impact

Airborne Contaminant Emitted	FAC Rule	Allowable Emissions lb/hr
PM	62-296.320	35.43
SO2	AO03-255252	0.8% fuel oil sulfur content
Objectionable Odors	62-296.320(2)	None allowed off plant property.
VE	62-296.320	Less than 20% opacity

Applicable Rules & Regulations

This source predates the applicability date of 40 CFR 60, Subpart I, and is regulated in accordance with FAC Rule 62-296.320, the General Pollultant Emission Limiting Standards including the process weight table and the general 20% VE limit. Additionally, the source has accepted the limits included in Rule 62-210.300(3)c.1., Conditional Exemptions from Title V Permitting.

Compliance Monitoring

Annually for PM and VE

Compliance History

Generally acceptable.

Fee Summary ***This is a minor source conditionally exempt from Title V permitting with two emission units. EU 001, the baghouse, is a type AO2A source (minor, stack test) with an application fee of $1500. EU 002, the asphalt heater with no source specific emission limits, is a type AO2C source (minor, no test requirement).***

Additional staff notes are attached.

rvk:rvkc

Review Notes, Operation Permit Renewal for G.A.C. Contractors, Inc. Gulf Asphalt Plant;

Application no. 0050008-001-AO received 11 June 1999, Bay County

From: Bob Kriegel

Date: 16-Jun-99

General:

An application was received June 11, 1999 from G.A.C. Contractors, Inc. (previously Gulf Asphalt) for renewal of the current operation permit for their Panama City plant. The application included a fee of $1500 (type AO 2A, minor source, stack sample) for their baghouse. The facility has a asphalt heater, which is currently unpermitted. The asphalt heater has no source specific emission limits, but should be considered a separate emission unit (type AO2C, minor source, no test requirements) , and require the appropriate application fee ($750). I contaced GAC (letter, 6/17), and they advised they have mailed the additional $750 application fee.

Our files contain minimal descriptive information about this plant, and any original drawings have disappeared from the files. I'd suggest language as follows, which has been coordinated with Billy Powell of GAC. (850 769-3477)

This facility consists of a 189 ton per hour batch asphalt plant (Madison, three ton batch) which 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 emission 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.

The current permit AO02-255252 issued 9/2/94) notes that this facility is subject to 40 CFR 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities. However, there are no specific conditions in the permit to this effect, prior permits did not identify Subpart I as applicable, and the facility seems to predate the applicability date (Our first permit is 1974; however, evidently this facility has been in constant operation since 1964 - see 6/17 letter from Powell.

The facility has accepted the more stringent limits included in Rule 62-213. 300(3)(c)1, Conditional Exemptions from Title V Air Permitting, Asphalt concrete plants, limiting potential emissions to less than Title V thresholds.

The initial permit in our files is AO03-2000A, dated 8/16/74.

The facility currently operates under permit AO03-255252, issued September 2, 1994, and amended January 19, 1996, January 7, 1997, and March 20, 1997. This permit limits fuel oil to No. 2 fuel oil with a maximum of 0.8% S, notes the applicability of 40 CFR Subpart I, allows RAP, and imposes an emission limit in pounds per hour (v. NSPS 0.04 gpdscf).

The January 19, 1996 amendment incorporates the provisions of Rule 62-210(3)c.1.a. - the Title V conditional exemption. This amendment notes that the emission limit of 0.04 gpdscf is incorporated into the permit. However, the conditional exemption only incorporates this limit if the facility is subject to 40 CFR 60 Subpart I, and this facility seems to precede the applicability date. The January 7, 1997 amendment limits RAP to 15% of the total asphalt concrete mix produced, and the March 20, 1997 amendment allows the heater to operate 3640 hours per year, v. 2500 for the plant.

Specific conditions of the permit include:

SC 2. Limits operation to 2500 hours/year. Amended 3/20/97 to allow heater to operate 3640 hours.
Past operation well within these limits - see AOR data.

SC 3. Establishes a maximum allowable operating rate of 189 tons/hour.
Has tested within these limits.

SC 4. Allows use of RAP; amended 1/7/97 to limit RAP to 15% of total product weight.
Has tested with RAP.

SC 7. Limits visible emission to 20%.
Tests indicate compliance.

SC 8. Limits PM emissions to 35.43 lbs/hour. The 1/1996 amendment incorporating the conditional exemption provisions, among other things, limits PM emissions to 0.04 gpdscf.
Test data are well within poundage limits. However, 1998 test data exceeds NSPS limit of 0.04 gpdscf. We accepted this with no follow up.

SC 10. Requires PM testing before the end of April.
Data from our files indicates the following tests/results.

Year	Date	Emissions	(35.43 lbs/hr limit)		Rate	RAP
		PM - lbs/h	PM-gpdsc	VE - %	(TPH)	(%)
1998	4/10/98	17.5	0.064	0	167	15
1997	6/12/97	6.3	0.023	0	155	
1996	9/19/96	5.1		1	162	15
1995	9/14/95	2.5	0.013	0	188	15

SC 11. Requires submission of annual operation reports.
Data from our files includes the following reports

Year	Date rcvd	Hrs opn	TPY prod
1997	2/17/98	412	64,053
1996	4/22/97	400	64,344
1995	4/16/96	400	45,579
1994	3/7/95	450	65,000

		SC 12. Requires submission of a renewal OP application prior to June 1, 1999.							
		Application received June 11, 1999							