



Florida Department of
Environmental Protection

Memorandum

TO: Sandra F. Veazey *SD 7/22/04*
THROUGH: Kevin M. White
FROM: Angelia Jackson
DATE: July 8, 2004
SUBJECT: Evaluation Summary for G.A.C. Contractors, Inc., dba Gulf Asphalt
0050008-002-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 in Panama City.

Process Description

This facility consists of a 189 ton per hour, Madison, three ton batch asphalt plant 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 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 pug mill 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 pug mill. Particulate emissions from the dryer, hot elevator, and shaker are ducted to the baghouse.

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	Estimated Emissions		Allowable* Emissions	
		lbs/hr	T/yr	lb/hr	T/yr
PM	N/A	N/A	N/A	N/A	35.43
SO2	N/A	N/A	69.18	N/A	<100
NOx	N/A	N/A	30	N/A	<100
CO	N/A	N/A	94.5	N/A	<100
Objectionable Odors	62-296.320(2)	N/A	N/A	None allowed off plant property	
VE	N/A	N/A	N/A	Not more than 20% opacity	

(Heater Emissions)

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions		Allowable*	
		lbs/hr	T/yr	lb/hr	T/yr
SO2 (#2 Fuel Oil)	N/A	N/A	3.67	N/A	<100
NOx (Nat. Gas)	N/A	N/A	0.35	N/A	<100
CO (Nat. Gas)	N/A	N/A	0.29	N/A	<100

* Less than 100 T/yr is a facility-wide limit to avoid TV permitting

Applicable Rules & Regulations

This source is not subject to 40 CFR 60, Subpart I, Standards of Performance for Hot Mix Asphalt Facilities since it was in operation in 1964 prior to June 11, 1973, the applicability date of Subpart I. This source is regulated in accordance with FAC Rule 62-296.320, the General Pollutant 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

Late reporting violations for three consecutive years (2001,2002, and 2003) were resolved with the execution of a SFCO, OGC File Number 04-0661-03-AO; penalties assessed and paid were \$1,500, along with \$750 of Department costs, for a total of \$2,250. The SFCO was executed on May 21, 2004.

2003 inspection report noted the facility as minor non-compliance, due to fugitive emissions in excess of 20 % noticed during the inspection. The hot elevator, mixture hopper, and access hatches at the top of the structure were all leaking during the inspection. Compliance without enforcement was initiated and the facility was re-inspected several weeks later. All sources of leaks had been repaired at the time of the re-inspection.

Two inspections were performed in 2001 and both noted the facility to be "In-Compliance".

2000 inspection also noted the facility as minor non-compliance. There was no documentation presented for the required 12 month rolling total records of asphalt produced, also sulfur content of the fuel oil.

Fee Summary. This is a minor source 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) with an application fee of \$750.00.

Additional Notes. Due to the past compliance issues at this facility a facility-wide operations and maintenance (O&M) plan was required during this permit renewal.

AMJ:ajc