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

GAC CONTRACTORS

POST OFFICE BOX 59462
PANAMA CITY, FL 32412-0462

May 11, 2009

Mr. Rick Bradburn
Air Program Administrator
160 Governmental Center
Pensacola, FL 32502

Subject: Air Permit No.: 0050008-002-A0
Facility ID No.: 0050008
Air Operation Permit Renewal
Due Date: May 23, 2009
Expiration Date: July 22, 2009

Dear Mr. Bradburn:

We intend to renew our Air Operation Permit (0050008-002-A0) for our Batch Mix Asphalt Plant located at 4116 North Highway 231 in Panama City, Bay County. Enclosed please find four (4) copies of the Application for Non-Title V Air Permit Renewal.

Please be advised that the application fee of $2,250.00 was mistakenly mailed apart from this packet.

We greatly appreciate the Department's considering this renewal. If any additional information is required, please do not hesitate to contact us at your convenience.

Sincerely,

Richard M. Dodd, P.E.
President

RECEIVED
MAY 14 2009
NORTHWEST FLORIDA
DEP

Department of Environmental Protection

Division of Air Resources Management

APPLICATION FOR NON-TITLE V AIR PERMIT RENEWAL

See Instructions for Form No. 62-210.900(4)

I. APPLICATION INFORMATION

Identification of Facility

1. Facility Owner/Company Name: GAC Contractors, Inc. d/b/a Gulf Asphalt	
2. Site Name: Gulf Asphalt	
3. Facility Identification Number: 0050008	4. Facility Status Code: A

Application Contact

1. Name and Title of Application Contact: Richard M. Dodd, President
2. Application Contact Mailing Address: Organization/Firm: GAC Contractors, Inc., d/b/a Gulf Asphalt Street Address: 4116 US Hwy 231 North City: Panama City, State: FL Zip Code: 32404
3. Application Contact Telephone Numbers: Telephone: (850) 769 - 3477 Fax: (850) 769 - 3456

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	
2. Permit Number:	

RECEIVED
MAY 14 2009
NORTHWEST FLORIDA
DEP

Owner/Authorized Representative

1. Name and Title of Owner/Authorized Representative:

   Richard M. Dodd, President

2. Owner/Authorized Representative Mailing Address:

   Organization/Firm: GAC Contractors, Inc.
   Street Address: 4116 US Hwy 231 North
   City: Panama City State: FL Zip Code: 32404

3. Owner/Authorized Representative Telephone Numbers:
   Telephone: (850) 769-3477 Fax: (850) 769-3456

4. Owner/Authorized Representative Statement:

   I, the undersigned, am the owner or authorized representative of the facility addressed in this Application for Air Permit. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. Further, I agree to operate and maintain the air pollutant emissions units and air pollution control equipment described in this application so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof. I understand that a permit, if granted by the Department, cannot be transferred without authorization from the Department, and I will promptly notify the Department upon sale or legal transfer of any permitted emissions unit.*

   Signature _____ Date 5/11/09

* Attach letter of authorization if not currently on file.

Scope of Application

Emissions Unit ID	Description of Emissions Unit	Permit Type	Processing Fee
0050008-001	Exhaust Stack on Asphalt Plant Bag House	A02A	$1500.00
0050008-002	Asphalt Heater	A02C	$750.00

Application Processing Fee

Check one: [x] Attached - Amount: $ 2,250.00 [ ] Not Applicable

Application Comment

Plant is permitted to use No. 2 diesel or natural gas as fuel.

II. FACILITY INFORMATION

Facility Contact

1. Name and Title of Facility Contact: Richard M. Dodd, President
2. Facility Contact Mailing Address: Organization/Firm: GAC Contractors, Inc. d/b/a Gulf Asphalt Street Address: 4116 US Hwy 231 North City: Panama City State: FL Zip Code: 32404
3. Facility Contact Telephone Numbers: Telephone: (850) 769 -3477 Fax: (850) 769 - 3456

Facility Supplemental Requirements

1. Area Map Showing Facility Location: [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested
2. Facility Plot Plan: [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested
3. Process Flow Diagram(s): [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested
4. Precautions to Prevent Emissions of Unconfined Particulate Matter: [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested

Facility Comment

Emissions Unit ID 0050008-001

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): Estee baghouse for emission control of the Asphalt Plant	
2. Emissions Unit Status Code: A	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 baghouse (Estee Model ST-12-468) which provides emissions control for the 189 ton per hour batch asphalt plant (Madison, 3-ton batch)	

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:	189 tons/hour	
4. Maximum Production Rate:	500,000 tons in any 12-month period	
5. Requested Maximum Operating Schedule:		
	hours/day	days/week
	weeks/year	2,500 hours/year

Emissions Unit ID 0050008-001

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 [x] Previously submitted, Date: 4/22/08	
3. Procedures for Startup and Shutdown [ ] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested	
4. Operation and Maintenance Plan [X] Attached, Document ID:_____ [ ] Not Applicable [ ] Waiver Requested	
5. Other Information Required by Rule or Statute [ ] Attached, Document ID:_____ [ ] Not Applicable	

Emissions Unit Comment

Emissions Unit ID 0C 008 - 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 or natural gas.	

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 when used,	
4. Maximum Production Rate:		
5. Requested Maximum Operating Schedule:		
hours/day		days/week
weeks/year	3,640	hours/year

Emissions Unit ID 02

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

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

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

June 16, 2004
Rev. 1 July 20, 2004
Rev. 2 March 31, 2009

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 fuel 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 yearly between March 1st and April 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 fuel oil

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)

HIGHWAY 231 GAC ASPHALT PLANT
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 July 22, 2009 – Update by May 22, 2009. _____

CC: Richard, Josh, Ernie