Florida Department of

Memorandum

Environmental Protection

TO: Rick Bradburn
THROUGH: Armando Sarasua, P.E.
FROM: Deborah Moore
DATE: August 6, 2009
SUBJECT: Evaluation Summary for G.A.C. Contractors, Inc., dba Gulf Asphalt 0050008-003-AO, Bay County

We recommend issuing a permit to G.A.C. Contractors, Inc., to operate their Gulf Asphalt batch plant located in Panama City. This renewal permit follows permit 0050008-002-AO, effective July 22, 2004.

Process Description. This facility consists of a 189-ton per hour Madison three-ton batch asphalt plant, in operation since 1964, 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 by natural gas or by No. 2 fuel oil with a maximum of 0.8% sulfur at a maximum rate of 16 gallons per hour. (emission unit 002, with no source-specific emissions limits).

A belt conveyor 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.

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 DM	lb/hr	T/yr
PM	62-296.320(4)(a)(2)	~~N/A~~ 35.43	~~N/A~~	N/A	~~35.43~~ 44.29 DM
SO2	N/A	N/A	69.18	N/A	N/A
NOx	N/A	N/A	30	N/A	N/A
CO	N/A	N/A	94.5	N/A	N/A
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 Emissions*	
		lbs/hr	T/yr	lb/hr	T/yr
SO2 (#2 fuel oil)	N/A	N/A	3.67	N/A	<100
NOx	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. The facility predates and is not regulated under NSPS, 40CFR Part 60, subpart I (Standards of Performance for Hot Mix Asphalt Facilities), because it was in operation in 1964, prior to the June 11, 1973 applicability date of Subpart I. The facility is subject to the General Pollutant Emission Limiting Standard contained in Rule 62-296.320, F.A.C., including the Process Weight Table and the general 20% VE limit. Additionally, the facility has accepted the limits included in Rule 62-210.300(3)(c)2., F.A.C. (Conditional Exemptions from Title V Permitting).

Compliance Monitoring. Annually for PM and VE.

Compliance History. Facility has been in compliance from 2007 to the most recent inspection conducted on 1/27/09. Minor non-compliance on inspection dated 3/21/06 due to not having fuel oil sulfur content documentation. CWOE performed by NWD on 6/6/06. 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 noted the facility as minor non-compliance. There was no documentation presented for the required 12-month rolling total records of asphalt produced and sulfur content of the fuel oil.

Fee Summary. The asphalt plant is an AO2A ($1,500 fee) minor source with a stack test. The asphalt heater (with no source specific emission limits) is a type AO2C ($750 fee) minor source with no test requirements.

DLM/c