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Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

May 19, 2011

By Electronic Mail, Received Receipt Requested
jdodd@gaccontractors.com

Mr. Joseph F. Dodd
Environmental Coordinator
GAC Contractors, Inc.
4116 Highway 231
Panama City, Florida 32404

Dear Mr. Dodd:

Permit 0050008-004-AC was issued January 26, 2011 after-the-fact for construction of a lime silo at the GAC Contractors facility in Panama City, Bay County. In your May 6, 2011 letter, you requested to use pictures of the silo that were taken the first time it was loaded to fulfill the visible emissions testing requirements of Specific Condition B.7.

Specific Condition B.10 requires that the visible emissions test be conducted according to EPA Method 9 which is described in Appendix A of 40 CFR 60 and adopted by reference in Rule 62-204.800, F.A.C., which is very specific with regard to how the test is conducted and the credentials of the observer. Therefore, the use of photographs is not an acceptable substitute.

However, your concern of not knowing when the silo might be loaded again is valid, and it was not the intent of the Department to dictate when that had to occur. Therefore, by this letter, Specific Condition B.7 is modified to require that the visible emission test be conducted the next time the silo is loaded. This will be considered "initial operation" for the purposes of Common Condition 12 of Section 4, Appendix C.

We have enclosed a corrected Page 8 of the permit for your records. All other conditions of this permit remain in effect. This letter shall be attached to and made a part of permit 0050008-004-AC.

If you have any questions, please contact Teresa Knepper at 850-595-0670 or e-mail teresa.knepper@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator

RB/tk/c
Enclosures
c: DEP Northwest District Branch Office, Panama City

NOTICE OF RIGHTS

Persons whose substantial interests are affected by this agency action have a right, pursuant to Sections 120.569 and 120.57, Florida Statutes, to petition for an administrative hearing on it. The Petition must contain the information set forth below and must be filed (received) at the Department's Office of General Counsel, 3900 Commonwealth Boulevard, MS 35, Tallahassee, Florida 32399-3000, within 21 days of receipt of this notice. A copy of the Petition must also be mailed at the time of filing to the Department's Northwest District Office, 160 W. Government Street, Room 308, Pensacola, Florida 32502-5740. Failure to file a petition within the 21 days constitutes a waiver of any right such person has to an administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes.

The petition shall contain the following information:

(a) The name, address, and telephone number of each petitioner; the county in which the subject matter or activity is located;

(b) A statement of how and when each petitioner received notice of the agency action;

(c) A statement of how each petitioner's substantial interests are affected by the agency action;

(d) A statement of the material facts disputed by petitioner, if any;

(e) A statement of facts which petitioner contends warrant reversal or modification of the agency action;

(f) A statement of which rules or statutes petitioner contends require reversal or modification of the agency action;

(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the agency action.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this Notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the subject agency action have the right to petition to become a party to the proceeding. The petition must conform to the requirements specified above and be filed (received) within 21 days of receipt of this notice in the Office of General Counsel at the above address of the Department. Failure to petition within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Sections 120.569 and 120.57, Florida Statutes, and to participate as a party to this proceeding. Any subsequent intervention will only be at the approval of the presiding officer upon motion filed pursuant to Rule 28-106.205, Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.

B. This section of the permit addresses the following new emissions unit.

ID No.	Emissions Unit Description
003	Lime Silo With Baghouse

EQUIPMENT

1. Equipment Name: The permittee is authorized, after-the-fact, to install one lime silo with top-mounted baghouse. [Application No. 0050008-004-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: For compliance testing, the maximum allowable operating rate is 50 tons of lime loaded per hour. [Rules 62-210.200(PTE), 62-4.160(2), F.A.C., and Application No. 0050008-004-AC]

3. Production: The total production rate of asphalt concrete (RAP or Non-RAP containing) containing lime shall not exceed 1750 tons per consecutive 12-month period. [Rules62-4.050(4)(a) 2.e., 62-210.200(PTE) and 62-4.160(2), F.A.C.; and Application No. 0050008-004-AC]

4. Authorized Fuel: NA

5. Restricted Operation: The hours of operation of the facility are not limited (8,760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

6. Emissions Standards:

   a. Particulate Matter. No Emission Unit – Specific limitation.

   b. Visible Emissions. Visible emissions associated with EU003 shall not exceed 20% opacity. [Rules 62-204.800(8)(b)12 and 62-210.300(3)(c)2.f., F.A.C.; 40CFR 60.92(a)(2); Application No. 0050008-004-AC]

TESTING REQUIREMENTS

7. Initial Compliance Tests: The emissions unit, EU003, shall be tested to demonstrate initial compliance with the general visible emissions standard while the silo is being loaded. The initial tests shall be conducted the first time the silo is loaded after issuance of the construction permit and prior to issuance of the air operation permit incorporating the silo. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

8. Annual Compliance Tests: Annual compliance tests will not be required for EU003.

9. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Notification may be sent via e-mail to nwdair@dep.state.fl.us. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

10. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

Curle, Mary Beth

From: Joe Dodd [jdodd@gaccontractors.com]
Sent: Friday, May 27, 2011 11:46 AM
To: Curle, Mary Beth
Subject: Re: DEP Air Program correction to permit 0050008-004-AC; GAC Contractors

Received. Thank you. Joe Dodd

----- Original Message -----
From: Curle, Mary Beth
To: jdodd@gaccontractors.com
Sent: Friday, May 27, 2011 10:46 AM
Subject: FW: DEP Air Program correction to permit 0050008-004-AC; GAC Contractors

Please acknowledge receipt of the attached document. Thank you.

Mary Beth Curle
Administrative Assistant, Northwest District Air Program
850/595-0578; fax 850/595-8096

Please Note: Florida has a very broad public records law.
Most written communications to or from state officials regarding state business are public records available to the public and media upon request.
Your e-mail communications may therefore be subject to public disclosure.

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on this link to the DEP Customer Survey. Thank you in advance for completing the survey.

From: Curle, Mary Beth
Sent: Thursday, May 19, 2011 7:32 AM
To: 'jdodd@gaccontractors.com'
Cc: Cooey, Sally; Sumner, Mark C.; Bradburn, Rick; Sarasua, Armando; Melton, Carol; Knepper, Teresa
Subject: DEP Air Program correction to permit 0050008-004-AC; GAC Contractors

Dear Sir/Madam:

Please send a reply message verifying receipt of the attached document by selecting "Reply" on the menu bar of your e-mail software and then selecting "Send." We must receive verification of receipt and your reply will preclude subsequent e-mail transmissions to verify receipt of the document.

The document may require action within a specified time frame. Please open and review as soon as possible.

The document is in Adobe Portable Document Format (pdf). Adobe Acrobat Reader can be downloaded for free at the following internet site: http://www.adobe.com/products/acrobat/readstep.html. When printing the attached document from Adobe Acrobat Reader, select "Document and comments" from the "Print What:" menu item; if this is not done the signature may not appear on the printed document.

Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. Thank you.

Please be advised that if you have anti-virus software, a warning may appear when you attempt to open our document. This is only a warning. We send our documents virus-free.

5/17/2011

GAC CONTRACTORS

GREAT NORTHWEST UTILITY SPECIALIST

GULF ASPHALT

POST OFFICE BOX 59462, PANAMA CITY, FL 32412-0462

FAX: (850) 769-3456

(850) 769-3477

(850) 785-4675

May 6, 2011

Mr. Rick Bradburn
Air Program Administrator
Department of Environmental Protection
160 Governmental Center
Pensacola, FL 32501-5794

Subject: GAC Contractors Asphalt Plant
Facility ID 0050008
Panama City, FL, Bay County
0050008-004-AC

Dear Mr. Bradburn:

In your letter dated February 18, 2011, you reminded us that Specific Condition 12 of Section 4, Appendix C, requires the silo to be inspected by a Professional Engineer, registered in the State of Florida, for conformity to the permit application and associated documents. Also, an application for an operation permit must be submitted with the compliance test results required by Specific Condition B.7.

We have a concern on meeting the latter compliance test. We only use the lime silo when we produce FC-5 for the FDOT that is an open-graded friction course used on interstates and rural roads. The FDOT does not use this mix in our typical service area and we do not foresee them requiring this mix in the next 2-3 years. For these reasons, we will not be loading our lime silo for some time, particularly since it cakes together with time. When we filled the silo for the first time we recorded the operation with 27 pictures. Also we were interested to checkout the silo baghouse to make sure it operated correctly; the pictures showed that the silo baghouse did not emit any visible plume. Would it be possible to use these pictures for our compliance test? We would be willing to meet with your local representative, Mark Summer, from the Panama City office to review the procedures used in making the pictures.

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NORTHWEST FLORIDA
DEP

I discussed this proposal with Teresa Knepper and she recommended we communicate with you.

If you need and further information, please contact us.

Sincerely,

Joseph F. Dodd
Environmental Coordinator

Cc: Teresa Knepper

JFD/nr

FILE COPY

Florida Department of
Environmental Protection
Northwest District
160 W. Government Street, Room 308
Pensacola, Florida 32502-5740

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard, Jr.
Secretary

February 3, 2011

By Electronic Mail, Received Receipt Requested
richard@gaccontractors.com

Mr. Richard Dodd P.E., President
GAC Contractors, Inc.
Post Office Box 59462
Panama City, Florida 32412-0462

Dear Mr. Dodd:

This letter is about monitoring of the lime silo at your Gulf Asphalt facility in Bay County, ID 0050008. It was brought to our attention by Mark Sumner of the Panama City Branch Office that the lime silo is not equipped with instrumentation for measuring pressure drop across the baghouse as required by Specific Conditions 11 and 13 in Section B of the recently issued permit 0050008-004-AC.

It was not the intent of the Department to require modifications to the equipment, only to include those provisions necessary to ensure proper operation and maintenance of the equipment. Therefore, by this letter, Specific Condition B.13 is deleted and Specific Condition B.11 is changed as follows:

11. Permittee shall determine appropriate monitoring and maintenance requirements for the lime silo and baghouse and make these a part of the facility Operation and Maintenance plan (OMP). The OMP shall address proper operation of the baghouse, ~~an appropriate pressure differential range across the bags during normal operation, monitoring frequency, recording of pressure readings,~~ routine checks, and replacement criteria, as appropriate, including appropriate corrective actions to be taken in the event of a malfunction, such as, but not limited to: In the event visible emissions are detected from the lime silo baghouse vent, its operation will be immediately stopped and appropriate actions taken to correct the problem. ~~The pressure readings shall be recorded in a logbook and made available for inspection by the Department for a period of at least two years.~~

We have enclosed a corrected Page 9 of the permit for your records. All other conditions of this permit remain in effect. This letter shall be attached to and made a part of permit 0050008-004-AC.

If you have any questions, please contact Teresa Knepper at 850-595-0670 or teresa.knepper@dep.state.fl.us.

Sincerely,

Rick Bradburn
Air Program Administrator

RB/tk/c

Enclosures
c: DEP Northwest District Branch Office, Panama City

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Mediation under Section 120.573, Florida Statutes, is not available in this proceeding.

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-204.800, 62-297.100, and 62-297.401, F.A.C.; Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

11. Permittee shall determine appropriate monitoring and maintenance requirements for the lime silo and baghouse and make these a part of the facility Operation and Maintenance Plan (OMP). The OMP shall address proper operation of the baghouse, routine checks, and replacement criteria, as appropriate, including appropriate corrective actions to be taken in the event of a malfunction, such as, but not limited to: In the event visible emissions are detected from the lime silo baghouse vent, its operation will be immediately stopped and appropriate actions taken to correct the problem..

RECORDS AND REPORTS

12. Test Reports
Permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(8), F.A.C.]

13. Conditional Exemptions from Title V Air Permitting Recordkeeping
The owner or operator shall maintain records to document the monthly and the 12-month rolling totals of tons of asphalt concrete produced, the tons of lime containing asphalt concrete produced, and the gallons of fuel oil consumed (by the asphalt concrete plant dryer, heater and portable RAP crusher engine, if applicable). Such records shall be retained for five years. [Application 0050008-004-AC and Rule 62-210.300(3)(c)2.g., F.A.C.]

14. Annual Operating Report: The owner or operator shall submit an Annual Air Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) to the Department annually pursuant to subsection 62-210.370(3), F.A.C.

NSPS REQUIREMENTS

15. 40 CFR 60 Requirements Incorporated. All requirements of Title 40, Code of Federal Regulations, part 60, subpart A, General Provisions, and subpart I, Standards of Performance for Hot Mix Asphalt Facilities, applicable to this source shall be adhered to. [Rule 62-204.800(8)(b), F.A.C.]

Florida Department of
Environmental Protection

Memorandum

TO: Rick Bradburn
THROUGH: Armando I. Sarasua, P.E.
FROM: Teresa R. Knepper, P.E.
DATE: February 2, 2011
SUBJECT: GAC Contractors, 0050008-004-AC

Mark Sumner called today to discuss a problem with the recently issued construction permit for the after-the-fact lime silo at the GAC Contractors facility in Bay County. Namely, the permit contains two specific conditions that reference monitoring the pressure drop across the baghouse on the lime silo; however, the equipment does not have the instrumentation for doing this.

Specific Condition 11 in Section B of the permit reads:

"11. Permittee shall determine appropriate monitoring and maintenance requirements for the lime silo and baghouse and make these a part of the facility Operation and Maintenance plan (OMP). The OMP shall address proper operation of the baghouse, an appropriate pressure differential range across the bags during normal operation, monitoring frequency, recording of pressure readings, appropriate corrective actions to be taken in the event of a malfunction. The pressure readings shall be recorded in a logbook and made available for inspection by the Department for a period of at least two years."

Specific Condition 13 in Section B of the permit reads:

"13. Operational Data: Permittee shall check and record the baghouse pressure differential during operation and record readings in a logbook. The logbook shall be made available for inspection by the Department. [Rules 62-4.070(3) and 62-4.160(2), F.A.C.]"

There are several reasons why this is impractical and unnecessary. First, the lime silo is not equipped with a pressure gauge or differential pressure instrument. Second, the lime silo is an insignificant emission unit that is used infrequently. Third, it was never the intent of the permit to require modification of the existing equipment.

Therefore, I recommend that Specific Condition B-13 be deleted and Specific Condition B-11 be modified as follows:

"11. Permittee shall determine appropriate monitoring and maintenance requirements for the lime silo and baghouse and make these a part of the facility Operation and Maintenance Plan (OMP). The OMP shall address proper operation of the lime silo baghouse, routine checks, and replacement criteria, as appropriate, including appropriate corrective actions to be taken in the event of a malfunction, such as, but not limited to: In the event visible emissions are detected from the lime silo baghouse vent, its operation will be immediately stopped and appropriate actions taken to correct the problem."