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**CONCRETE BATCHING PLANT
AIR GENERAL PERMIT REGISTRATION FORM**

Part II. Notification to Permitting Office

(Detach and submit to appropriate permitting office; keep copy onsite)

Instructions: To give notice to the Department of an eligible facility's intent to use this air general permit, the owner or operator of the facility must detach and complete this part of the Air General Permit Registration Form and submit it to the appropriate Department of Environmental Protection or local air pollution control program office which has permitting authority. Please type or print clearly all information, and enclose the appropriate air general permit registration processing fee pursuant to Rule 62-4.050, F.A.C. (\$100 as of the effective date of this form)

Registration Type

0690066-004

Check one:

INITIAL REGISTRATION - Notification of intent to:

- Construct and operate a proposed new facility.
 Operate an existing facility not currently using an air general permit (e.g., a facility proposing to go from an air operation permit to an air general permit).

RE-REGISTRATION (for facilities currently using an air general permit) - Notification of intent to:

- Continue operating the facility after expiration of the current term of air general permit use.
 Continue operating the facility after a change of ownership.
 Make an equipment change requiring re-registration pursuant to Rule 62-210.310(2)(e), F.A.C., or any other change not considered an administrative correction under Rule 62-210.310(2)(d), F.A.C.

Surrender of Existing Air Operation Permit(s) - For Initial Registrations Only

If the facility currently holds one or more air operation permits, such permit(s) must be surrendered by the owner or operator upon the effective date of this air general permit. In such case, check the first box, and indicate the operation permits being surrendered. If no air operation permits are held by the facility, check the second box.

- All existing air operation permits for this facility are hereby surrendered upon the effective date of this air general permit; specifically permit number(s):
FDEP Permit No. 0690066-003-AO _____
 No air operation permits currently exist for this facility.

General Facility Information

Facility Owner/Company Name (Name of corporation, agency, or individual owner who or which owns, leases, operates, controls, or supervises the facility.)

Mack Concrete Industries, Inc.

Site Name (Name, if any, of the facility site; e.g., Plant A, Metropolis Plant, etc. If more than one facility is owned, a registration form must be completed for each.)

Mack Concrete Industries, Inc.

Facility Location (Provide the physical location of the facility, not necessarily the mailing address.)

Street Address: 23902 County Road 561

City: Astatula

County: Lake

Zip Code: 34705

Facility Start-Up Date (Estimated start-up date of proposed new facility.) (N/A for existing facility)

Owner/Authorized Representative

Name and Position Title (Person who, by signing this form below, certifies that the facility is eligible to use this air general permit.)

Print Name and Title: Greg Liskey, Vice President and General Manager

Owner/Authorized Representative Mailing Address

Organization/Firm: Mack Concrete Industries, Inc.

Street Address: 23902 County Road 561

City: Astatula

County: Lake

Zip Code: 34705

Owner/Authorized Representative Telephone Numbers

Telephone: (352) 742-2333

Fax: (352) 742-0799

Cell phone (optional):

Facility Contact (If different from Owner/Authorized Representative)

Name and Position Title (Plant manager or person to be contacted regarding day-to-day operations at the facility.)

Print Name and Title: Greg Liskey, Vice President and General Manager

Facility Contact Mailing Address

Organization/Firm: Mack Concrete Industries, Inc.

Street Address: 23902 County Road 561

City: Astatula

County: Lake

Zip Code: 34705

Facility Contact Telephone Numbers

Telephone: (352) 742-2333

Fax: (352) 742-0799

Cell phone (optional):

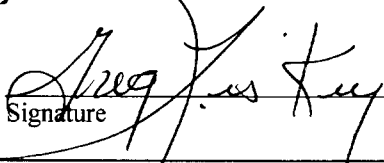
Owner/Authorized Representative Statement

This statement must be signed and dated by the person named above as owner or authorized representative

I, the undersigned, am the owner or authorized representative of the owner or operator of the facility addressed in this Air General Permit Registration Form. I hereby certify, based on information and belief formed after reasonable inquiry, that the facility addressed in this registration form is eligible for use of this air general permit and that the statements made in this registration form are true, accurate and complete. Further, I agree to operate and maintain the facility described in this registration form 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 will promptly notify the Department of any changes to the information contained in this registration form.

Signature



Date

9-27-07

Type of Facility

Check one:

Stationary Facility

Relocatable Facility

Type(s) of Reasonable Precautions Used to Prevent Unconfined Emissions

Check all precautions to be used for the management of roads, parking areas, stock piles and yards:

Pave Roads

Pave Parking Areas

Pave Yards

Maintain Roads/Parking/Yards

Use Water Application

Use Dust Suppressant

Remove Particulate Matter

Reduce Stock Pile Height

Install Wind Breaks

Check all precautions to be used for the management of drop points to trucks:

Spray Bar

Chute

Enclosure

Partial enclosure

Description of Reasonable Precautions

Below, or as an attachment to this form, provide details of all types of reasonable precautions to be used to prevent unconfined emissions at the facility.

Aggregate and sand stock piles are located within three sided cement walled wind breaks. A water spray system is utilized on the stock piles to maintain a minimum moisture content of 8 to 12 % in accordance with D.O.T. standards.

~~The limited roadways and yard areas are maintained and sprayed by a water truck as necessary to control any fugitive particulate emissions resulting from the wind and intermittent vehicular traffic. Periodic accumulated particulate matter is collected and removed as necessary.~~

The site and various equipment on the site are maintained under a rigorous routine maintenance system to allow operational efficiency.

The two cement and one fly ash storage silos (a total of three silos) are each equipped with separate baghouses to collect and control periodically generated particulate laden air during the pneumatic loading of the silos by a tanker truck.

Mack Concrete Industrie, Inc. also has an onsite FDEP certified visible emissions observer who daily inspects the operations.

Description of Facility

Below, or as an attachment to this form, provide a description of the concrete batching plant operations at the facility in sufficient detail to demonstrate the facility's eligibility for use of this air general permit and to provide a basis for tracking any future equipment or process changes at the facility. Describe all air pollutant-emitting processes and equipment at the facility, and identify any air pollution control measures or equipment used.

The purpose of this submittal is to obtain a five-year Air General Operating Permit for a concrete batching operation which produces pre-stress concrete products. The operation consists of two 11' diameter storage silos (1-cement and 1-fly ash) each equipped with a C&W Manufacturing Model #CP-310-478 dust collector; and one 13' diameter cement storage silo equipped with a C&W Manufacturing Model # CP-LPR-8-P dust collector (a total of three silos). Each collector is rated at 99.9% efficiency to collect and control periodically generated particulate laden air during the pneumatic loading of the silos by a tanker truck.

Sand/aggregate materials utilized in the mix to make the concrete products are stored on site in separate storage areas composed of wind break cement sided walls to protect the materials from being dried out by the wind. The stockpiles are maintained by a water sprinkling system in accordance to D.O.T standards (maintaining a moisture content of approximately 8 to 12 %). As a result, there are no visible fugitive emissions from the storage or movement of these materials. The moist sand and aggregate materials are periodically removed from their storage areas via front-end loaders and transferred into a ground level feed hopper then onto a conveyor belt which move the materials to elevated weigh hopper storage bins. The materials are then dispersed as necessary onto a belt conveyor and directed to a 2-cubic yard mix hopper (equipped with a water spray ring and a rubber seal enclosing the mix hopper). The materials are combined with cement, fly ash product (dispersed from separate elevated storage silos via enclosed chutes), and water (in accordance with job specifications) to form a concrete mix. The finished concrete mix is then directed from the mix hopper (via an enclosed chute) and poured into various molds to make the pre-stress concrete products.

Please see the following Attachments:

- Attachment 1: Particulate Emission Calculations To Obtain Air General Operating Permit.
- Attachment 2: Plot Plan
- Attachment 3: USGS Map
- Attachment 4: Manufacturer's Information and Process Equipment
- Attachment 5: Copy of August 13, 2007 DEP Method 9 compliance testing performed on the baghouse exhaust vents during the pneumatic loading of cement storage silo #1, cement storage silo #2, and the fly ash storage silo.
- Attachment 6: Copy of Current FDEP Permit No. 0690066-003-AO

Attachment 1

**Mack Concrete Industries, Inc.
Particulate Emission Calculations for
Air General Operating Permit**

Mack Concrete Industries Inc.
Concrete Batch Plant
Application for FDEP Air General Operating Permit
Particulate Emission Calculations

***Plant Assumptions**

Composition of 1 yd³ of concrete based on AP-42 Section 11.12 Concrete Batching:

Course Aggregate	= ~ 1,865 lbs.
Sand	= ~ 1,428 lbs.
Cement	= ~ 491 lbs.
Cement supplements	= ~ 73 lbs.
Water	= ~ 20 gallons (8.34 lb/gal)
Proposed operating hours of plant	= 5,000 hours/year
Pneumatic loading rate of cement storage silo	= ~30 tons/hr of cement loaded
Pneumatic loading rate of fly ash storage silo	= ~30 tons/hr of fly ash loaded
Tanker pneumatic unloading pressure	= 8 to 10 PSI
Storage silo dust control	= baghouse (99% efficiency)
Batch Mixer loading PM control	= water spray rings and rubber seals
Batching load out operation	= ~ 2.0 yd ³ (~ 12.0 yd ³ /hr)
Assorted aggregate/sand stockpile size	= ~ 1,000 tons each
Stockpile dust control	= water spray system/D.O.T. standards
Truck traffic roadway dust control	= roadways are maintained/sprayed with water to prevent fugitive dust

Particulate Emissions Factors per yd³ of Concrete Produced
AP-42 Table 11.12-2; 06/06 Edition

Conversion factor from lb/ton to lb/yd ³	= 0.282 (co-efficient for emission factor)
Total Particulate Emission Factor for cement unloading	= 0.00099 lbs PM per yd ³
PM-10 Emission Factor for cement unloading	= 0.00034 lbs PM per yd ³
Total Particulate Emission Factor for fly ash unloading	= 0.0089 lbs PM per yd ³
PM-10 Emission Factor for fly ash unloading	= 0.0049 lbs PM per yd ³
Total Particulate Emission Factor for mixer loading	= 0.544 lbs PM per yd ³

PM-10 Emission Factor
for mixer loading = 0.134 lbs PM per yd³

PARTICULATE EMISSION CALCULATIONS

Total Particulate

$$\begin{aligned} [(0.00099 \text{ lbs PM}) + (0.0089 \text{ lbs PM}) + (0.544 \text{ lbs PM})] &= 0.55389 \text{ lbs PM} \\ [(0.55389 \text{ lbs PM}) \times (0.282)] &= 0.1561969 \text{ lb PM/yd}^3 \end{aligned}$$

$$(0.1561969 \text{ lb PM/yd}^3) \times (12.0 \text{ yd}^3 \text{ produced/hr}) = 1.8743628 \text{ lb PM/yd}^3$$

$$\begin{aligned} (1.8743628 \text{ lb PM/yd}^3) \times (5,000 \text{ hr/yr}) &= 9,371.8 \text{ lb PM/yr} \\ (9,371.8 \text{ lb PM/yr}) / (2,000 \text{ lb/ton}) &= 4.69 \text{ ton/yr} \end{aligned}$$

PM-10 Particulate

$$\begin{aligned} [(0.00034 \text{ lbs PM}) + (0.0049 \text{ lbs PM}) + (0.134 \text{ lbs PM})] &= 0.13924 \text{ lbs PM} \\ [(0.02719 \text{ lbs PM}) \times (0.282)] &= 0.0076675 \text{ lb PM/ yd}^3 \end{aligned}$$

$$(0.13924 \text{ lb PM/yd}^3) \times (12.0 \text{ yd}^3 \text{ produced/hr}) = 1.67088 \text{ lb/hr}$$

$$[(1.67088 \text{ lb/hr}) \times (5,000 \text{ hr/yr})] / (2,000 \text{ lb/ton}) = 4.18 \text{ ton/yr}$$

HAP EMISSIONS

Although the process does not utilize HAPs, AP-42 Table 11.12-8 lists (9) – metal emission factors. Based on the highest emission factor (ie 1.0×10^{-6} lb arsenic/ ton of material loaded) that would equate to:

$$\begin{aligned} [4,024 \text{ lb (1.0 yd}^3 \text{ concrete produced)}] \times (2 \text{ yd}^3 \text{ mixer capacity}) &= 8,048 \text{ lb material} \\ 8,048 \text{ lb} / (2,000 \text{ lb/ton}) &= 4.024 \text{ ton material} \\ (4.024 \text{ ton}) \times (1.0 \times 10^{-6} \text{ lb arsenic/ ton of material loaded}) &= 4.0 \times 10^{-6} \text{ lb arsenic} \\ (4.0 \times 10^{-6} \text{ lb arsenic}) \times (12 \text{ loadings/hr}) \times (5,000 \text{ hr/yr}) &= 2.4 \times 10^{-2} \text{ lb arsenic/yr} \end{aligned}$$

Based on this example, this source is expected to comply with the HAP limits of <10.0 tons/yr of a single HAP and < 25.0 tons/yr of combined HAPs.

- It should be noted that Mack Concrete Industries' material stockpiles maintain an 8 to 12 % moisture content via a sprinkling system in accordance with D.O.T. standards. The yard area and limited roadways for truck and vehicular traffic are maintained by a water spray truck to control fugitive dusting.
- Established AP-42 emissions factors for concrete production were utilized to estimate conservative emissions resulting from this operation.

11.12 CONCRETE BATCHING

11.12-1 Process Description¹⁻⁵

Concrete is composed essentially of water, cement, sand (fine aggregate) and coarse aggregate. Coarse aggregate may consist of gravel, crushed stone or iron blast furnace slag. Some specialty aggregate products could be either heavyweight aggregate (of barite, magnetite, limonite, ilmenite, iron or steel) or lightweight aggregate (with sintered clay, shale, slate, diatomaceous shale, perlite, vermiculite, slag pumice, cinders, or sintered fly ash). Supplementary cementitious materials, also called mineral admixtures or pozzolan minerals may be added to make the concrete mixtures more economical, reduce permeability, increase strength, or influence other concrete properties. Typical examples are natural pozzolans, fly ash, ground granulated blast-furnace slag, and silica fume, which can be used individually with portland or blended cement or in different combinations. Chemical admixtures are usually liquid ingredients that are added to concrete to entrain air, reduce the water required to reach a required slump, retard or accelerate the setting rate, to make the concrete more flowable or other more specialized functions.

Approximately 75 percent of the U.S. concrete manufactured is produced at plants that store, convey, measure and discharge these constituents into trucks for transport to a job site. At most of these plants, sand, aggregate, cement and water are all gravity fed from the weight hopper into the mixer trucks. The concrete is mixed on the way to the site where the concrete is to be poured. At some of these plants, the concrete may also be manufactured in a central mix drum and transferred to a transport truck. Most of the remaining concrete manufactured are products cast in a factory setting. Precast products range from concrete bricks and paving stones to bridge girders, structural components, and panels for cladding. Concrete masonry, another type of manufactured concrete, may be best known for its conventional 8 x 8 x 16-inch block. In a few cases concrete is dry batched or prepared at a building construction site. Figure 11.12-1 is a generalized process diagram for concrete batching.

The raw materials can be delivered to a plant by rail, truck or barge. The cement is transferred to elevated storage silos pneumatically or by bucket elevator. The sand and coarse aggregate are transferred to elevated bins by front end loader, clam shell crane, belt conveyor, or bucket elevator. From these elevated bins, the constituents are fed by gravity or screw conveyor to weigh hoppers, which combine the proper amounts of each material.

11.12-2 Emissions and Controls⁶⁻⁸

Particulate matter, consisting primarily of cement and pozzolan dust but including some aggregate and sand dust emissions, is the primary pollutant of concern. In addition, there are emissions of metals that are associated with this particulate matter. All but one of the emission points are fugitive in nature. The only point sources are the transfer of cement and pozzolan material to silos, and these are usually vented to a fabric filter or "sock". Fugitive sources include the transfer of sand and aggregate, truck loading, mixer loading, vehicle traffic, and wind erosion from sand and aggregate storage piles. The amount of fugitive emissions generated during the transfer of sand and aggregate depends primarily on the surface moisture content of these materials. The extent of fugitive emission control varies widely from plant to plant. Particulate emission factors for concrete batching are give in Tables 11.12-1 and 11.12-2.

Types of controls used may include water sprays, enclosures, hoods, curtains, shrouds, movable and telescoping chutes, central duct collection systems, and the like. A major source of potential emissions, the movement of heavy trucks over unpaved or dusty surfaces in and around the plant, can be controlled by good maintenance and wetting of the road surface.

Predictive equations that allow for emission factor adjustment based on plant specific conditions are given in the Background Document for Chapter 11.12 and Chapter 13. Whenever plant specific data are available, they should be used with these predictive equations (e.g. Equations 11.12-1 through 11.12-3) in lieu of the general fugitive emission factors presented in Table 11.12-1 through 11.12-5 in order to adjust to site specific conditions, such as moisture levels and localized wind speeds.

11.12-3 Updates since the 5th Edition.

October 2001 – This major revision of the section replaced emissions factors based upon engineering judgment and poorly documented and performed source test reports with emissions tests conducted at modern operating truck mix and central mix facilities. Emissions factors for both total PM and total PM₁₀ were developed from this test data.

June 2006 – This revision of the section supplemented the two source tests with several additional source tests of central mix and truck mix facilities. The measurement of the capture efficiency, local wind speed and fines material moisture level was improved over the previous two source tests. In addition to quantifying total PM and PM₁₀, PM_{2.5} emissions were quantified at all of the facilities. Single value emissions factors for truck mix and central mix operations were revised using all of the data. Additionally, parameterized emissions factor equations using local wind speed and fines material moisture content were developed from the newer data.

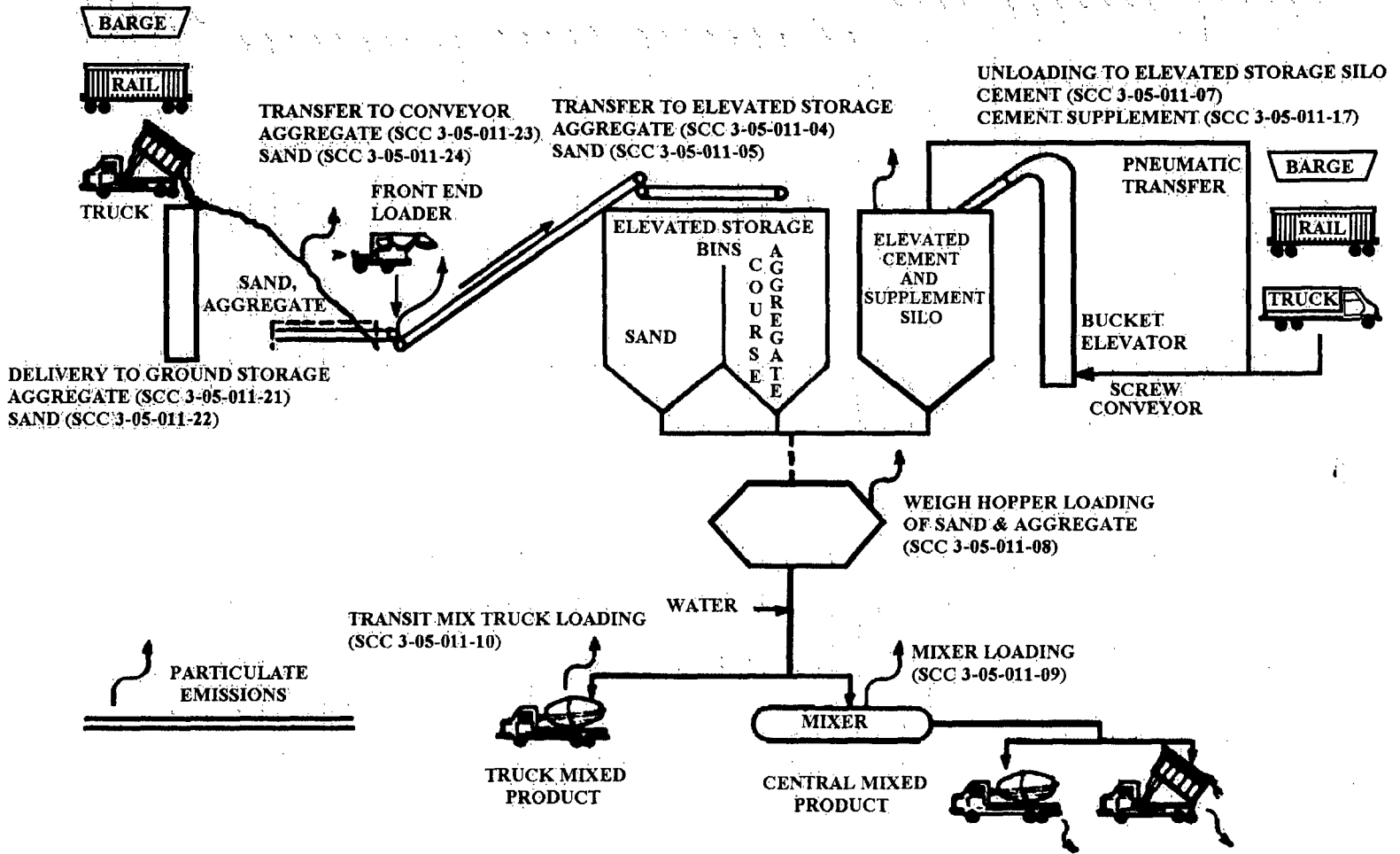


Figure 11.12-1: Typical Concrete Batching Process.

TABLE 11.12-2 (ENGLISH UNITS)
EMISSION FACTORS FOR CONCRETE BATCHING ^a

Source (SCC)	Uncontrolled				Controlled			
	Total PM	Emission Factor Rating	Total PM ₁₀	Emission Factor Rating	Total PM	Emission Factor Rating	Total PM ₁₀	Emission Factor Rating
Aggregate transfer ^b (3-05-011-04,-21,23)	0.0069	D	0.0033	D	ND		ND	
Sand transfer ^b (3-05-011-05,22,24)	0.0021	D	0.00099	D	ND		ND	
Cement unloading to elevated storage silo (pneumatic) ^c (3-05-011-07)	0.72	E	0.46	E	0.00099	D	0.00034	D
Cement supplement unloading to elevated storage silo (pneumatic) ^d (3-05-011-17)	3.14	E	1.10	E	0.0089	D	0.0049	E
Weigh hopper loading ^e (3-05-011-08)	0.0051	D	0.0024	D	ND		ND	
Mixer loading (central mix) ^f (3-05-011-09)	0.544 or Eqn. 11.12-1	B	0.134 or Eqn. 11.12-1	B	0.0173 or Eqn. 11.12-1	B	0.0048 or Eqn. 11.12-1	B
Truck loading (truck mix) ^g (3-05-011-10)	0.995	B	0.278	B	0.0568 or Eqn. 11.12-1	B	0.0160 or Eqn. 11.12-1	B
Vehicle traffic (paved roads)	See AP-42 Section 13.2.1							
Vehicle traffic (unpaved roads)	See AP-42 Section 13.2.2							
Wind erosion from aggregate and sand storage piles	See AP-42 Section 13.2.5							

ND = No data

^a All emission factors are in lb of pollutant per ton of material loaded unless noted otherwise. Loaded material includes course aggregate, sand, cement, cement supplement and the surface moisture associated with these materials. The average material composition of concrete batches presented in references 9 and 10 was 1865 lbs course aggregate, 1428 lbs sand, 491 lbs cement and 73 lbs cement supplement. Approximately 20 gallons of water was added to this solid material to produce 4024 lbs (one cubic yard) of concrete.

^b Reference 9 and 10. Emission factors are based upon an equation from AP-42, Section 13.2.2, with $k_{PM-10} = .35$, $k_{PM} = .74$, $U = 10\text{mph}$, $M_{\text{aggregate}} = 1.77\%$, and $M_{\text{sand}} = 4.17\%$. These moisture contents of the materials ($M_{\text{aggregate}}$ and M_{sand}) are the averages of the values obtained from Reference 9 and Reference 10.

^c The uncontrolled PM & PM-10 emission factors were developed from Reference 9. The controlled emission factor for PM was developed from References 9, 10, 11, and 12. The controlled emission factor for PM-10 was developed from References 9 and 10.

^d The controlled PM emission factor was developed from Reference 10 and Reference 12, whereas the controlled PM-10 emission factor was developed from only Reference 10.

^e Emission factors were developed by using the Aggregate and Sand Transfer Emission Factors in conjunction with the ratio of aggregate and sand used in an average yard³ of concrete. The unit for these emission factors is lb of pollutant per ton of aggregate and sand.

^f References 9, 10, and 14. The emission factor units are lb of pollutant per ton of cement and cement supplement. The general factor is the arithmetic mean of all test data.

^g Reference 9, 10, and 14. The emission factor units are lb of pollutant per ton of cement and cement supplement. The general factor is the arithmetic mean of all test data.

The particulate matter emissions from truck mix and central mix loading operations are calculated in accordance with the values in Tables 11.12-1 or 11.12-2 or by Equation 11.12-1¹⁴ when site specific data are available.

$$E = k (0.0032) \left[\frac{U^a}{M^b} \right] + c \quad \text{Equation 11.12-1}$$

- E = Emission factor in lbs./ton of cement and cement supplement
- k = Particle size multiplier (dimensionless)
- U = Wind speed at the material drop point, miles per hour (mph)
- M = Minimum moisture (% by weight) of cement and cement supplement
- a, b = Exponents
- c = Constant

The parameters for Equation 11.12-1 are summarized in Tables 11.12-3 and 11.12-4.

Table 11.12-3. Equation Parameters for Truck Mix Operations

Condition	Parameter Category	k	a	b	c
Controlled ¹	Total PM	0.8	1.75	0.3	0.013
	PM ₁₀	0.32	1.75	0.3	0.0052
	PM _{10-2.5}	0.288	1.75	0.3	0.00468
	PM _{2.5}	0.048	1.75	0.3	0.00078
Uncontrolled ¹	Total PM	0.995			
	PM ₁₀	0.278			
	PM _{10-2.5}	0.228			
	PM _{2.5}	0.050			

Table 11.12-4. Equation Parameters for Central Mix Operations

Condition	Parameter Category	k	a	b	c
Controlled ¹	Total PM	0.19	0.95	0.9	0.0010
	PM ₁₀	0.13	0.45	0.9	0.0010
	PM _{10-2.5}	0.12	0.45	0.9	0.0009
	PM _{2.5}	0.03	0.45	0.9	0.0002
Uncontrolled ¹	Total PM	5.90	0.6	1.3	0.120
	PM ₁₀	1.92	0.4	1.3	0.040
	PM _{10-2.5}	1.71	0.4	1.3	0.036
	PM _{2.5}	0.38	0.4	1.3	0

1. Emission factors expressed in lbs/tons of cement and cement supplement

To convert from units of lbs/ton to units of kilograms per mega gram, the emissions calculated by Equation 11.12-1 should be divided by 2.0.

Particulate emission factors per yard of concrete for an average batch formulation at a typical facility are given in Tables 11.12-5 and 11.12-6. For truck mix loading and central mix loading, the

emissions of PM, PM-10, PM-10-2.5, and PM-2.5 are calculated by multiplying the emission factor calculated using Equation 11.12-2 by a factor of 0.282 to convert from emissions per ton of cement and cement supplement to emissions per yard of concrete. This equation is based on a typical concrete formulation of 564 pounds of cement and cement supplement in a total of 4,024 pounds of material (including aggregate, sand, and water). This calculation is summarized in Equation 11.12-2.

$$\text{PM, PM10, PM10-2.5, PM2.5 emissions} \left(\frac{\text{pounds}}{\text{yd}^3 \text{ of concrete}} \right) = 0.282 (\text{Equation 11.12-1 factor or Table 11.12-2 Factor})$$

Equation 11.12-2

Metals emission factors for concrete batching are given in Tables 11.12-6 and 11.12-7. Alternatively, the metals emissions from ready mix plants can be calculated based on (1) the weighted average concentration of the metal in the cement and the cement supplement (i.e. flyash) and (2) on the total particulate matter emission factors calculated in accordance with Equation 11.12-3. Emission factors calculated using Equation 11.12-3 are rated D.

$$\text{Metal}_{\text{EF}} = \text{PM}_{\text{EF}} \left(\frac{aC + bS}{C + S} \right) \quad \text{Equation 11.12-3}$$

Where:

Metal _{EF}	=	Metal Emissions, Lbs. As per Ton of Cement and Cement Supplement
PM _{EF}	=	Controlled Particulate Matter Emission Factor (PM, PM10, or PM2.5) Lbs. per Ton of Cement and Cement Supplement
a	=	ppm of Metal in Cement
C	=	Quantity of Cement Used, Lbs. per hour
b	=	ppm of Metal in Cement Supplement
S	=	Quantity of Cement Supplement Used, Lbs. per hour

This equation is based on the assumption that 100% of the particulate matter emissions are material entrained from the cement and cement supplement streams. Equation 11.12-3 over-estimates total metal emissions to the extent that sand and fines from aggregate contribute to the total particulate matter emissions.

TABLE 11.12-5 (ENGLISH UNITS)
PLANT WIDE EMISSION FACTORS PER YARD OF TRUCK MIX CONCRETE ^a

	Uncontrolled		Controlled	
	PM (lb/yd ³)	PM-10 (lb/yd ³)	PM (lb/yd ³)	PM-10 (lb/yd ³)
Aggregate delivery to ground storage (3-05-011-21)	0.0064	0.0031	0.0064	0.0031
Sand delivery to ground storage (3-05-011-22)	0.0015	0.0007	0.0015	0.0007
Aggregate transfer to conveyor (3-05-011-23)	0.0064	0.0031	0.0064	0.0031
Sand transfer to conveyor (3-05-011-24)	0.0015	0.0007	0.0015	0.0007
Aggregate transfer to elevated storage (3-05-011-04)	0.0064	0.0031	0.0064	0.0031
Sand transfer to elevated storage (3-05-011-05)	0.0015	0.0007	0.0015	0.0007
Cement delivery to Silo (3-05-011-07 controlled)	0.0002	0.0001	0.0002	0.0001
Cement supplement delivery to Silo (3-05-011-17 controlled)	0.0003	0.0002	0.0003	0.0002
Weigh hopper loading (3-05-011-08)	0.0079	0.0038	0.0079	0.0038
Truck mix loading (3-05-011-10)	See Equation 11.12-2			

TABLE 11.12-6 (ENGLISH UNITS)
PLANT WIDE EMISSION FACTORS PER YARD OF CENTRAL MIX CONCRETE ^a

	Uncontrolled		Controlled	
	PM (lb/yd ³)	PM-10 (lb/yd ³)	PM (lb/yd ³)	PM-10 (lb/yd ³)
Aggregate delivery to ground storage (3-05-011-21)	0.0064	0.0031	0.0064	0.0031
Sand delivery to ground storage (3-05-011-22)	0.0015	0.0007	0.0015	0.0007
Aggregate transfer to conveyor (3-05-011-23)	0.0064	0.0031	0.0064	0.0031
Sand transfer to conveyor (3-05-011-24)	0.0015	0.0007	0.0015	0.0007
Aggregate transfer to elevated storage (3-05-011-04)	0.0064	0.0031	0.0064	0.0031
Sand transfer to elevated storage (3-05-011-05)	0.0015	0.0007	0.0015	0.0007
Cement delivery to Silo (3-05-011-07 controlled)	0.0002	0.0001	0.0002	0.0001
Cement supplement delivery to Silo (3-05-011-17 controlled)	0.0003	0.0002	0.0003	0.0002
Weigh hopper loading (3-05-011-08)	0.0079	0.0038	0.0079	0.0038
Central mix loading (3-05-011-09)	See Equation 11.12-2			

^a Total facility emissions are the sum of the emissions calculated in Tables 11.12-4 or 11.12-5. Total facility emissions do not include road dust and wind blown dust. The emission factors in Tables 11.12-4 and 11.12-5 are based upon the following composition of one yard of concrete.

Coarse Aggregate	1865. pounds
Sand	1428. pounds
Cement	491. pounds
Cement Supplement	73. pounds
Water	20. gallons (167 pounds)

TABLE 11.12-8 (ENGLISH UNITS)
CONCRETE BATCH PLANT METAL EMISSION FACTORS ^a

	Arsenic	Beryllium	Cadmium	Total Chromium	Lead	Manganese	Nickel	Total Phosphorus	Selenium	Emission Factor Rating
Cement Silo Filling ^b (SCC 3-05-011-07) w/ Fabric Filter	1.68e-06 4.24e-09	1.79e-08 4.86e-10	2.34e-07 4.86e-10	2.52e-07 2.90e-08	7.36e-07 1.09e-08	2.02e-04 1.17e-07	1.76e-05 4.18e-08	1.18e-05 ND	ND ND	E E
Cement Supplement Silo Filling ^c (SCC 3-05-011-17) w/ Fabric Filter	ND 1.00e-06	ND 9.04e-08	ND 1.98e-10	ND 1.22e-06	ND 5.20e-07	ND 2.56e-07	ND 2.28e-06	ND 3.54e-06	ND 7.24e-08	E E
Central Mix Batching ^d (SCC 3-05-011-09) w/ Fabric Filter	2.32e-07 1.87e-08	ND ND	1.18e-08 7.10e-10	1.42e-06 1.27e-07	3.82e-07 3.66e-08	6.12e-05 3.78e-06	3.28e-06 2.48e-07	2.02e-05 1.20e-06	ND ND	E E
Truck Loading ^e (SCC 3-05-011-10) w/ Fabric Filter	3.04e-06 1.16e-06	2.44e-07 1.04e-07	3.42e-08 9.06e-09	1.14e-05 4.10e-06	3.62e-06 1.53e-06	6.12e-05 2.08e-05	1.19e-05 4.78e-06	3.84e-05 1.23e-05	2.62e-06 1.13e-07	E E

ND=No data

^a All emission factors are in lb of pollutant per ton of material loaded unless noted otherwise. Loaded material includes course aggregate, sand, cement, cement supplement and the surface moisture associated with these materials. The average material composition of concrete batches presented in references 9 and 10 was 1865 lbs course aggregate, 1428 lbs sand, 491 lbs cement and 73 lbs cement supplement. Approximately 20 gallons of water was added to this solid material to produce 4024 lbs (one cubic yard) of concrete.

^b The uncontrolled emission factors were developed from Reference 8. The controlled emission factors were developed from Reference 9 and 10. Although controlled emissions of phosphorous compounds were below detection, it is reasonable to assume that the effectiveness is comparable to the average effectiveness (98%) for the other metals.

^c Reference 10.

^d Reference 9. The emission factor units are lb of pollutant per ton of cement and cement supplement. Emission factors were developed from a typical central mix operation. The average estimate of the percent of emissions captured during each test run is 94%.

^e Reference 9 and 10. The emission factor units are lb of pollutant per ton of cement and cement supplement. Emission factors were developed from two typical truck mix loading operations. Based upon visual observations of every loading operation during the two test programs, the average capture efficiency during the testing was 71%.

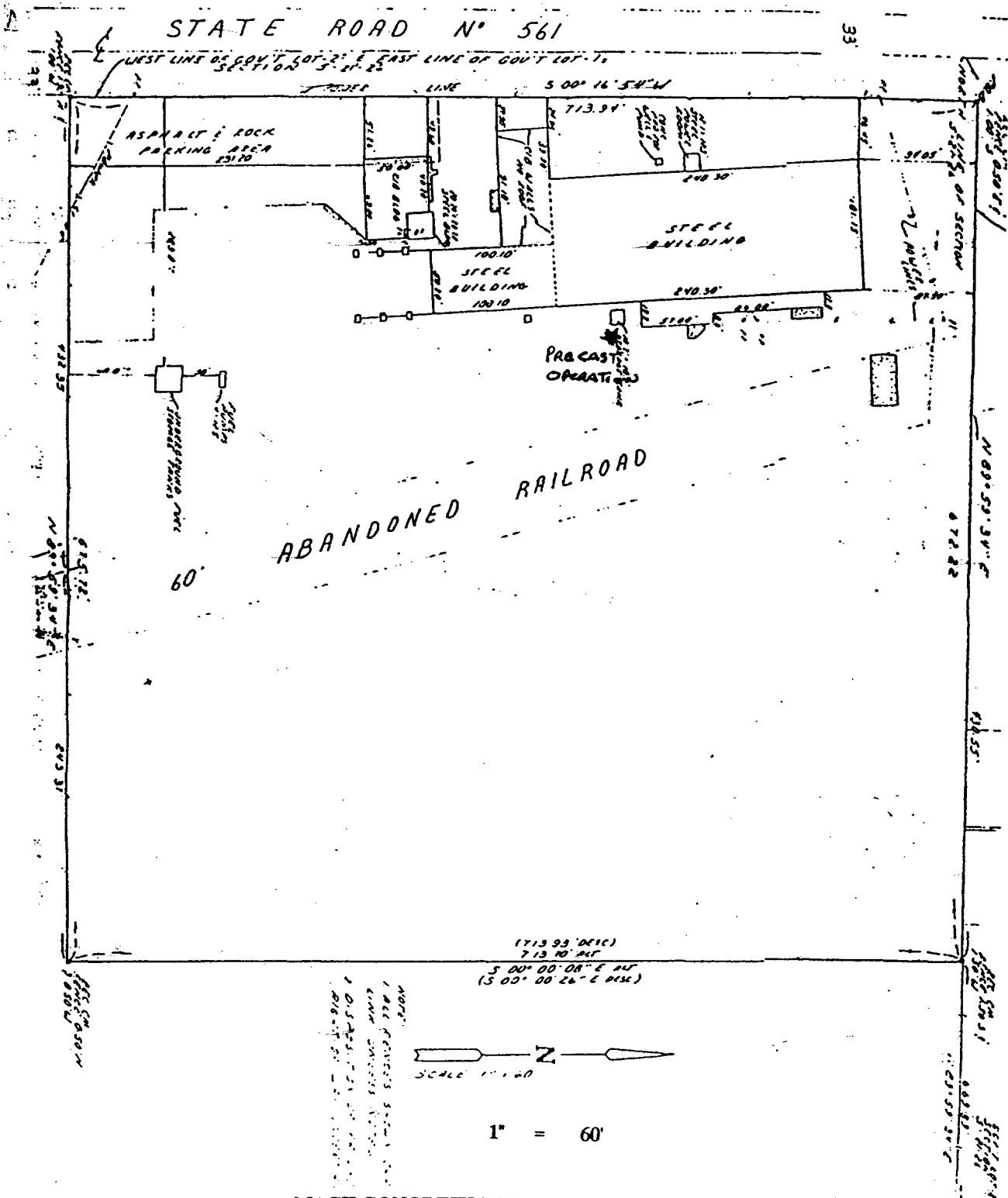
References for Section 11.12

1. *Air Pollutant Emission Factors*, APTD-0923, U.S. Environmental Protection Agency, Research Triangle Park, NC, April 1970.
2. *Air Pollution Engineering Manual*, 2nd Edition, AP-40, U.S. Environmental Protection Agency, Research Triangle Park, NC, 1974. Out of Print.
3. Telephone and written communication between Edwin A. Pfetzing, PEDCo Environmental, Inc., Cincinnati, OH, and Richards Morris and Richard Meininger, National Ready Mix Concrete Association, Silver Spring, MD, May 1984.
4. *Development Document for Effluent Limitations Guidelines and Standards of Performance, The Concrete Products Industries, Draft*, U.S. Environmental Protection Agency, Washington, DC, August 1975.
5. Portland Cement Association. (2001). Concrete Basics. Retrieved August 27, 2001 from the World Wide Web: <http://www.portcement.org/cb/>
6. *Technical Guidance for Control of Industrial Process Fugitive Particulate Emissions*, EPA-450/3-77-010, U.S. Environmental Protection Agency, Research Triangle Park, NC, March 1977.
7. *Fugitive Dust Assessment at Rock and Sand Facilities in the South Coast Air Basin*, Southern California Rock Products Association and Southern California Ready Mix Concrete Association, Santa Monica, CA, November 1979.
8. Telephone communication between T.R. Blackwood, Monsanto Research Corp., Dayton, OH, and John Zoller, PEDCo Environmental, Inc., Cincinnati, OH, October 18, 1976.
9. *Final Test Report for USEPA [sic] Test Program Conducted at Chaney Enterprises Cement Plant*, ETS, Inc., Roanoke, VA April 1994.
10. *Final Test Report for USEPA [sic] Test Program Conducted at Concrete Ready Mixed Corporation*, ETS, Inc., Roanoke, VA April 1994.
11. *Emission Test for Tiberi Engineering Company*, Alar Engineering Corporation, Burbank, IL, October, 1972.
12. *Stack Test "Confidential"* (Test obtained from State of Tennessee), Environmental Consultants, Oklahoma City, OK, February 1976.
13. *Source Sampling Report, Particulate Emissions from Cement Silo Loading*, Specialty Alloys Corporation, Gallaway, Tennessee, Reference number 24-00051-02, State of Tennessee, Department of Health and Environment, Division of Air Pollution Control, June 12, 1984.
14. Richards, J. and T. Brozell. "Ready Mixed Concrete Emission Factors, Final Report" Report to the Ready Mixed Concrete Research Foundation, Silver Spring, Maryland. August 2004.

Attachment 2

**Mack Concrete Industries, Inc.
Site Plan**

Site Plan



MACK CONCRETE INDUSTRIES, INC.

LEGAL DESCRIPTION

According to information supplied to the appraiser, the property can be legally described as:

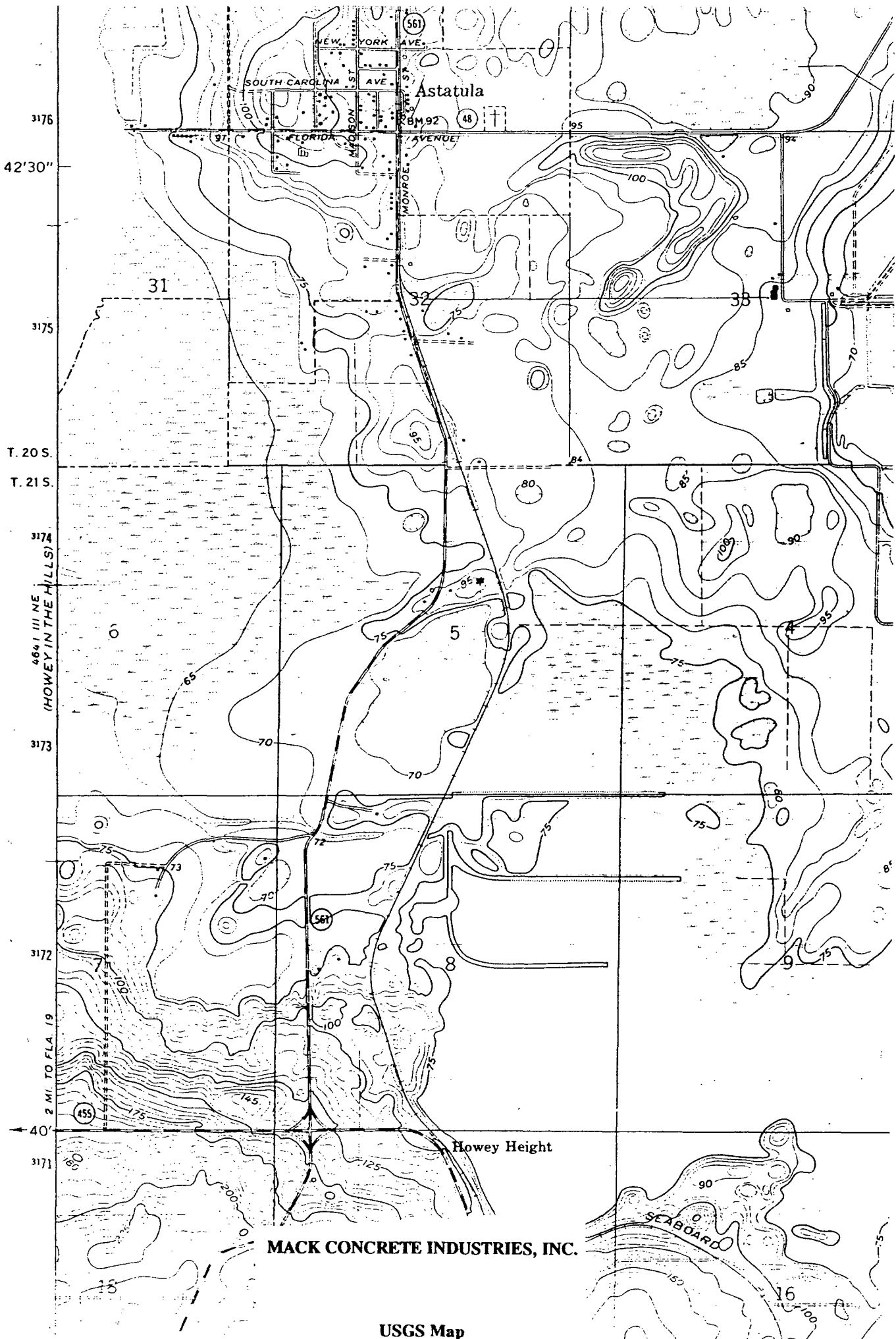
That part of Government Lots 2 and 3 in Section 5, Township 21 South, Range 26 East, Lake County, Florida, lying east of the easterly right-of-way line of State Road No. 561 (Maintenance Map filed by D.O.T. on same recorded in Lake County Clerks Office), described as follows: Begin at the intersection of the north boundary of said Government Lot 3 and the easterly right-of-way line of State Road No. 561, run thence N89° 59' 34" E along the north lines of Government Lots 2 and/or 3 a distance of 672.22 feet to a point that is 430.55 feet east of the northeasterly right-of-way line of the abandoned Seaboard Coastline Railroad, thence S00° 00' 26" E 713.93 feet, thence S89° 59' 34" W 675.72 feet to a point on the easterly right-of-way line of said State Road No. 561, thence N00° 16' 54" E 713.94 feet to the point of beginning.*

Together with all structures, buildings, fixtures, and other improvements located on the described real property.

NOTE: This legal does not account for the 60 foot abandoned railroad right-of-way. According to public record, the right-of-way belongs to Sleepy Hollow Arabians, Inc., P.O. Box 193, Astatula, Florida 32705.

Attachment 3

**Mack Concrete Industries, Inc.
USGS Map**



3176

42'30"

3175

T. 20 S.

T. 21 S.

3174

4641 III NE
(HOWEY IN THE HILLS)

3173

3172

2 MI. TO FLA. 19

40'

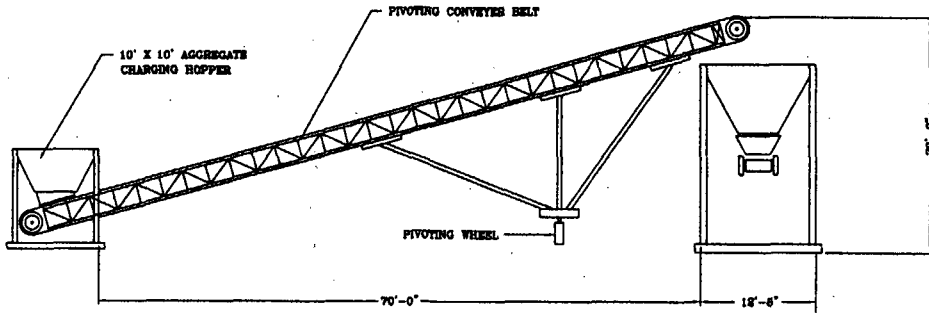
3171

MACK CONCRETE INDUSTRIES, INC.

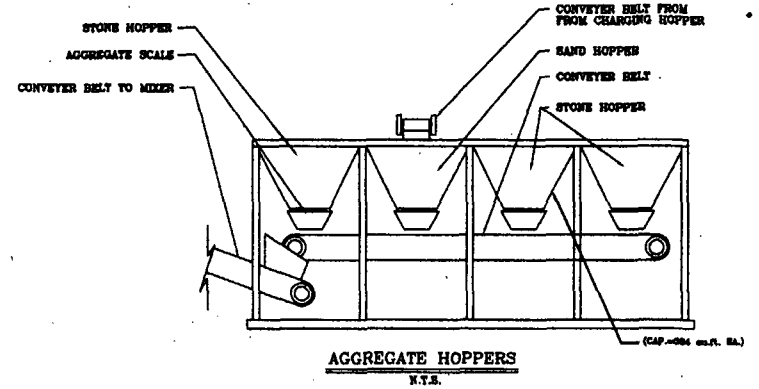
USGS Map

Attachment 4

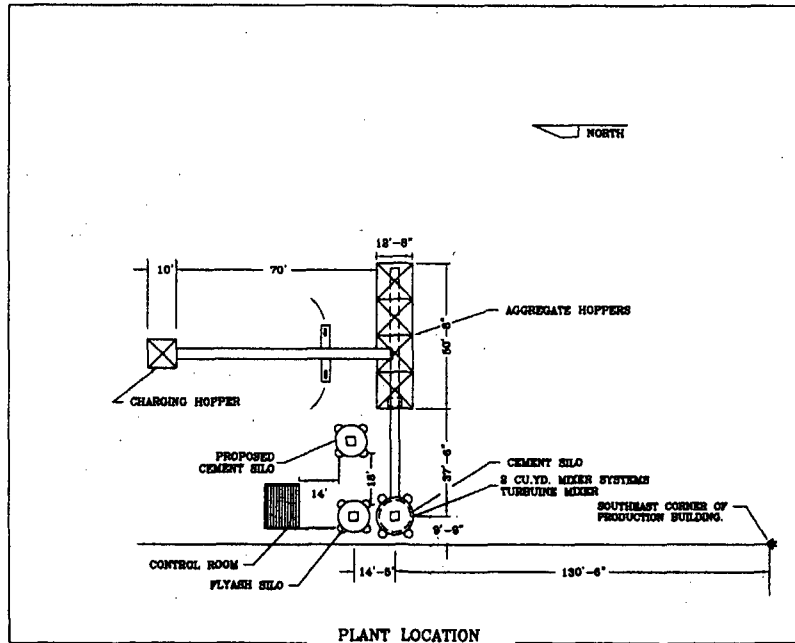
**Mack Concrete Industries, Inc.
Manufacturer's Information and Process Equipment**



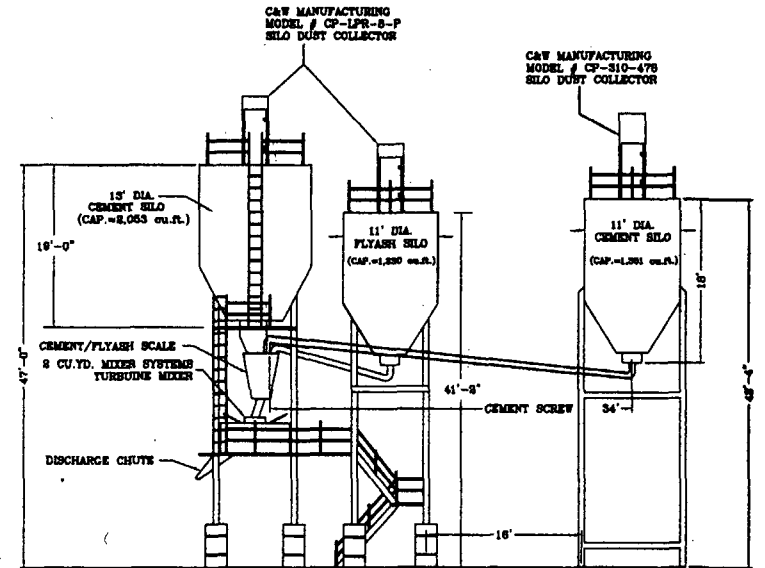
HOPPER LOADING LAYOUT
N.T.S.



AGGREGATE HOPPERS
N.T.S.



PLANT LOCATION



CEMENT AND FLYASH SILOS
N.T.S.

MACK CONCRETE IND.

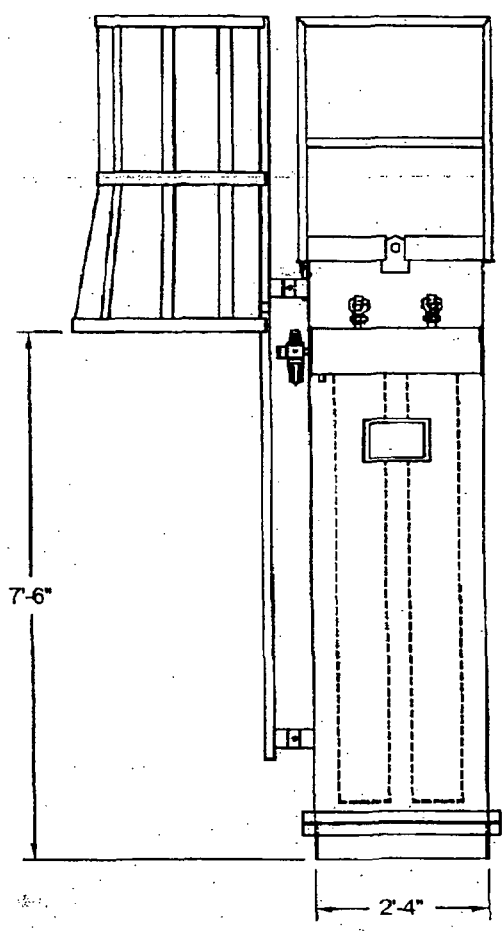
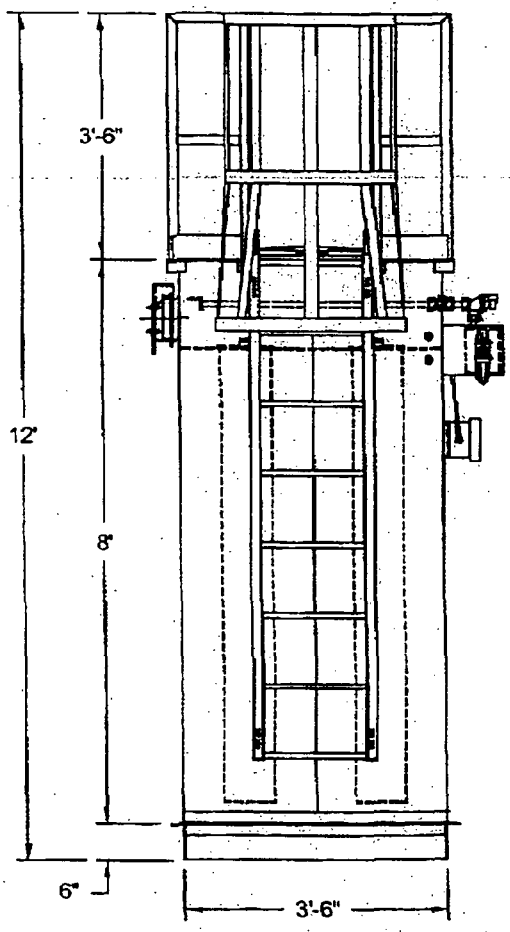
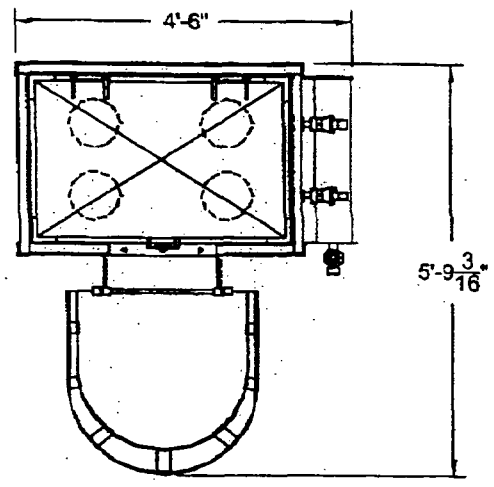
P.O. BOX 197 ABERNATHY, FLORIDA 34409
(904) 262-0262 (904) 262-0704
ABERNATHY, FLORIDA

BATCH PLANT LAYOUT

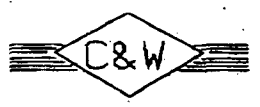
SCALE : 1" = 30'-0"	DRAWING # BATCHES
DRAWN BY : ED	DATE : 6-8-82
REV. 12-11-80	SHEET 1 OF 1



ACAD/DRAW/NEWEST/GA/C.P.310
NOTE: THIS PRINT NOT FOR
CONSTRUCTION. FOR
GENERAL REF. ONLY



CP-310-478 CARTRIDGE PULSE JET SILO COLLECTOR



C & W MFG. & SALES CO.
 6933 SHELMOR RD.
 ALVARADO, TX. 76009 (817) 790-5000

CP-Series Silo Dust Collectors

C & W's CP-Series of Silo Dust Collectors offer you technology with a pulse Cartridge Pulse. The advanced Pulse Jet technology is combined with our cartridge filters to provide a highly effective, yet inexpensive solution for dust control.

Our CP Silo Collectors are engineered by dust control specialists with careful attention to efficiency and user-friendliness.

Features

- Toolless Exchange of Filter Media
- Solid State Adjustable Timers w/ LED Display
- Top Entry for Clean Side Filter Exchange
- Vertical, Wide-Pleat Cartridges
- Inlet Air Regulator and Moisture Separator
- 12 Gauge, Heavy Duty Steel Construction
- Test Ports for Monitoring Filter Media
- 99.99% Filtration Efficiency

Options

- Pressure Switch for Automatic Cleaning
- Magnehelic Gauge
- Custom Designs and Sizes
- Special Mounting Flange for Adapting to Existing Flange
- Blower Packages, Standard or Custom-Built
- Special Filter Media
- Silo Anti-Overfill System
- Pressure Relief Valves and Bin Indicators

Specs

Specifications	CP-35-219	CP-100-1227	CP-230-639	CP-300-839	CP-310-478	CP-450-1078
Filtration Area (sq. ft.)	36	110	228	304	304	456
# of Filters	2	1	6	8	4	6
Cartridge Size	8" x 19"	12" x 27"	8" x 39"	8" x 39"	8" x 78"	8" x 78"
Overall Height	2' 4"	4' 5"	5' 4"	5' 4"	9' 6"	9' 6"
Flange Width	2' 0"	1' 10"	3' 6"	4' 8"	3' 6"	3' 6"
Flange Length	1' 0"	1' 10"	2' 4"	3' 6"	2' 4"	2' 4"
Approx. Weight (lbs.)	165	450	610	975	925	1,025
Compressed Air Req.'d	3	4	5	6	6	6
CFM Recommended	140	400	850	1600	1600	2500
Min. Design Efficiency	99.99%	99.99%	99.99%	99.99%	99.99%	99.99%

Specifications	CP-610-878	CP-760-1078	CP-900-1278	CP-1220-1678	CP-1520-2078	CP-2250-3078
Filtration Area (sq. ft.)	608	760	912	1216	1520	2280
# of Filters	8	10	12	16	20	30
Cartridge Size	8" x 78"	8" x 78"	8" x 78"	8" x 78"	8" x 78"	8" x 78"
Overall Height	9' 6"	9' 6"	12' 0"	14' 0"	14' 0"	14' 0"
Flange Width	4' 8"	4' 8"	4' 8"	6' 0"	6' 0"	8' 0"
Flange Length	3' 6"	3' 6"	3' 6"	5' 4"	6' 0"	6' 0"
Approx. Weight (lbs.)	1,395	1,495	3	4,000	4,500	5,550
Compressed Air Req.'d	8	10	12	12	12	12
CFM Recommended	3000	4000	5000	6700	8400	12400
Min. Design Efficiency	99.99%	99.99%	99.99%	99.99%	99.99%	99.99%

*CFM shown for typical application. Unique application may change CFM recommended.

Note: Weights and dimensions are approximate. Call C & W Mfg. and Sales Co. for specific details.

Cement	Glass	Salt
Chalk	Gold Ore	Slate
Clay	Grain	Soap
Coal	Gypsum	Talc
Coke	Paint Pigments	Wood
Fly Ash	Sands	

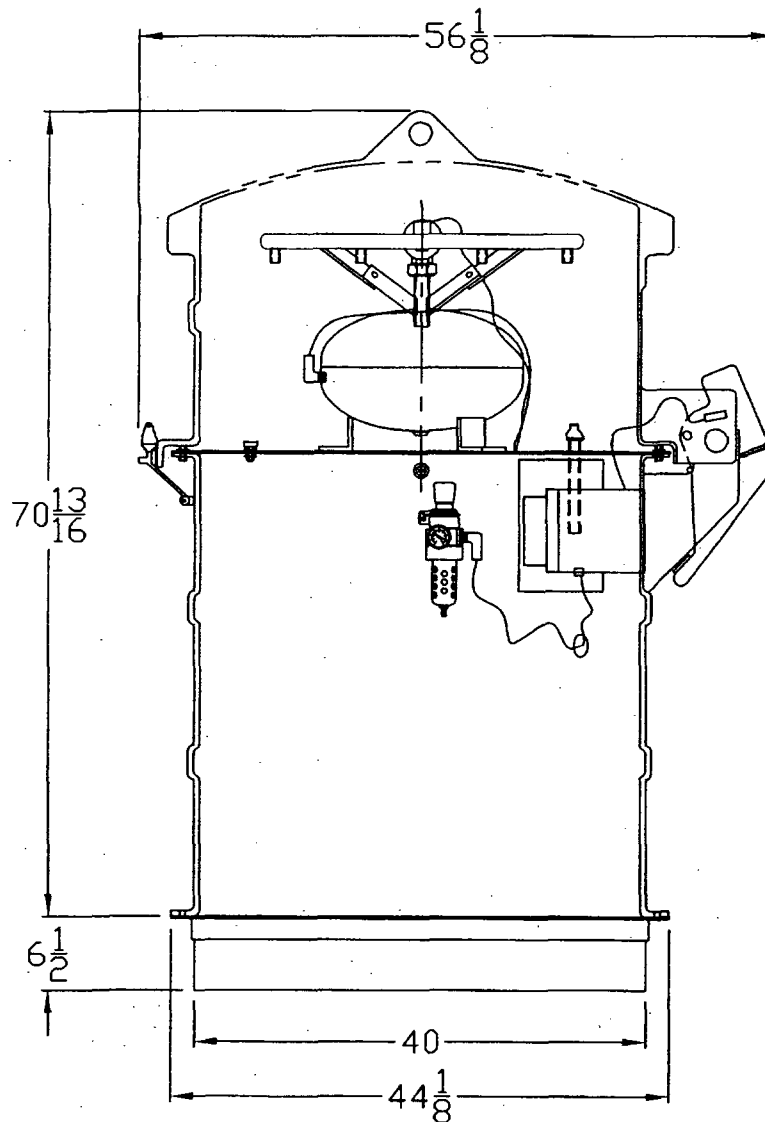
**FOR YOUR AREA
REPRESENTATIVE
CALL US
TODAY!**

C & W MANUFACTURING AND SALES CO.

P.O. Box 908, Crowley, TX 76036 1-800-980-3070

NOTE: THIS PRINT NOT FOR
CONSTRUCTION. FOR
GENERAL REF. ONLY

ITEM	QTY.	DESCRIPTION	P/N
1	2	SOLENOID 1"	SO002
2	1	4-POLE TIMER BOARD	ET039
3	1	FILTER/REGULATOR	AL004
4	8	CARTRIDGE 8" X 39"	CD012
5	1	OPTIONAL FLOW SENSOR SWITCH	S0002
6	1	OPTIONAL PRESSURE SENSOR SWITCH	S0001



CARTRIDGE PULSE SILO COLLECTOR, LOW PROFILE ROUND

CP-LPR-8-P

PARTS LIST



C & W MFG. & SALES CO.
6933 SHELMOR RD.
ALVARADO, TX. 76009

(817) 790-5000

Specifications

C & W Silo Collectors

SPECIFICATIONS FOR CP LPR COLLECTORS			
MODEL NUMBER	LPR-4	LPR-6	LPR-8
NUMBER OF CARTRIDGES	4	6	8
CARTRIDGE DIA. X LGTH	8"X39"	8"X39"	8"X39"
NUMBER OF SOLENOIDS	2	2	2
TOTAL FILTRATION AREA	193	290	386
MIN. DESIGN EFFICIENCY	99.99%	99.99%	99.99%
AIR TO CLOTH RATIO (ACFM/SQ.FT)	6	6	6
FILTRATION VELOCITY (FT./MIN.)	6	6	6
STATIC PRESSURE DROP (WC)	6"	6"	6"
NORMAL AIR CAPACITY	1170	1760	2340
OUTLET AREA (SQ. FT)	0.52	0.52	0.52
OUTLET VELOCITY (FT./SEC.)	38	56	75
OUTLET MOISTURE CONTENT	0	0	0
COMPRESSED AIR REQUIRED	2	3	4
CLEANING MECHANISM	Pulse Jet	Pulse Jet	Pulse Jet

SPECIFICATIONS

Attachment 5

**Mack Concrete Industries, Inc.
Most recent FDEP Method 9
Compliance Testing Data**

September 20, 2007

GG Receipt Copy

Ms. Wanda Parker, Supervisor Air Compliance Section
Division of Air Resource Management
Florida Department of Environmental Protection
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

RECEIVED
SEP 21 2007

Mack Concrete Industries, Inc.
FDEP Permit No. 0690066-003-AO
Concrete Batch Plant

DEP Central Dist.

Dear Ms. Parker;

This correspondence is being submitted at the request of our client, Mack Concrete Industries, Inc. (MCII).

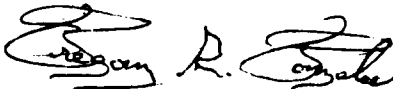
Please find attached a copy of the results from the FDEP Method 9 compliance testing performed on August 13, 2007 on the subject permitted source. (Testing performed in accordance with our telephone conversation with Ms. Caroline Shine and our July 28, 2007 "E-Mail" providing the required 15-day advance testing notification).

The testing was conducted at the MCII facility located at 23902 County Road 561; Astatula, Florida and performed on the baghouse exhaust vents from two (2) cement storage silos and one (1) fly ash storage silo. The tanker pneumatic unloading pressure was between 8 to 10 psi during the loading of the silos. The highest six-minute opacity during the 30-minute test period was 0%, which is within the permit limit of <5% opacity. It should be noted that during the loading of the fly ash storage silo, the test was stopped for approximately 25 minutes to allow the truck hose to be unclogged. Testing was resumed without incident.

Should you have any questions, please do not hesitate to call Mr. Greg Liskey at the facility (352-742-2333) or myself at (407) 932-0409 or my "E-Mail" address: ggonzales5@cfl.rr.com.

Sincerely,

GG ENVIRONMENTAL SOLUTIONS, INC.



Gregory R. Gonzales
President
1430 Sara L. Street
Kissimmee, Florida 34744-2771

cc: Greg Liskey - Mack Concrete Industries, Inc.
Caroline Shine - FDEP Air Compliance Section

STATE OF FLORIDA

Visible Emissions Observation Form

Source/Process Information				Opacity Readings									
FACILITY NAME				OBSERVATION				START TIME		STOP TIME			
MACK Concrete Industries				August 13, 2007				0740		0832			
SOURCE NAME		PERMIT NO		SEC	0	15	30	45	SEC	0	15	30	45
Concrete Batch Plant		06900666-003-AD		MIN					MIN				
LOCATION / ADDRESS				1	0	0	0	0	31	0	0	0	0
23902 County Road 561, Apalachicola, Florida				2	0	0	0	0	32	0	0	0	0
CONTACT		PHONE NO		3	0	0	0	0	33	0	0	0	0
CREG Holsky		(352) 742-2333		4	0	0	0	0	34	0	0	0	0
PROCESS / PRODUCTION RATE				5	0	0	0	0	35	0	0	0	0
29.94 Tons/hr cement product loaded into Silo				6	0	0	0	0	36	0	0	0	0
CONTROL EQUIPMENT		OPERATING MODE		7	0	0	0	0	37	0	0	0	0
Baghouse		Auto Pulse		8	0	0	0	0	38	0	0	0	0
FUEL TYPE / RATE		MATERIAL TYPE / RATE		9	0	0	0	0	39	0	0	0	0
N/A		Type I Cement dust 30 Tons/hr		10	0	0	0	0	40	0	0	0	0
DESCRIBE EMISSION POINT				11	0	0	0	0	41	0	0	0	0
Cylindrical Vent				12	0	0	0	0	42	0	0	0	0
HEIGHT ABOVE GROUND LEVEL		HEIGHT TO OBSERVER		13	0	0	0	0	43	0	0	0	0
~45 FT		~39 FT		14	0	0	0	0	44	0	0	0	0
Emissions Description				15	0	0	0	0	45	0	0	0	0
DESCRIBE EMISSIONS				16	0	0	0	0	46	0	0	0	0
START NONE END NONE				17	0	0	0	0	47	0	0	0	0
FLUME COLOR		FLUME TYPE		18	0	0	0	0	48	0	0	0	0
NONE				19	0	0	0	0	49	0	0	0	0
WATER DROPLETS PRESENT? IF YES				20	0	0	0	0	50	0	0	0	0
YES NO <input checked="" type="checkbox"/> ATTACHED DETACHED				21	0	0	0	0	51	0	0	0	0
Meteorological Information				22	0	0	0	0	52	0	0	0	0
BACKGROUND		BACKGROUND COLOR		23	0	0	0	0	53	0	0	0	0
START Sky END Same		START Blue Sky END Same		24	0	0	0	0	54	0	0	0	0
SITE CONDITIONS		AMBIENT TEMP		25	0	0	0	0	55	0	0	0	0
CLOUD COVER		START ~78°F END ~80°F		26	0	0	0	0	56	0	0	0	0
START Clear END Same				27	0	0	0	0	57	0	0	0	0
WIND SPEED		WIND DIRECTION		28	0	0	0	0	58	0	0	0	0
START 0-3 mph END Same		START From NE END Same		29	0	0	0	0	59	0	0	0	0
Observation Data, Site Diagram				30	0	0	0	0	60				
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Stack With Plume </p> <p>Sun </p> <p>Wind </p> </div> <div style="width: 45%; text-align: right;"> <p>Draw North Arrow </p> <p>Wind </p> </div> </div> <div style="text-align: center; margin-top: 10px;"> </div>													
Comments Recertified on 8/9/07 - awaiting cert. from ETA Tanker pneumatic unloading pressure = 8 to 10 PSI Tanker product = 25.95 Tons Type I No objectionable odors were detected during test period													

EASTERN TECHNICAL ASSOCIATES

GREGORY GONZALES

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

2/7/2007 8/9/2007 ORLF06
 DATE OF SCHOOL EXPIRATION DATE LAST LECTURE

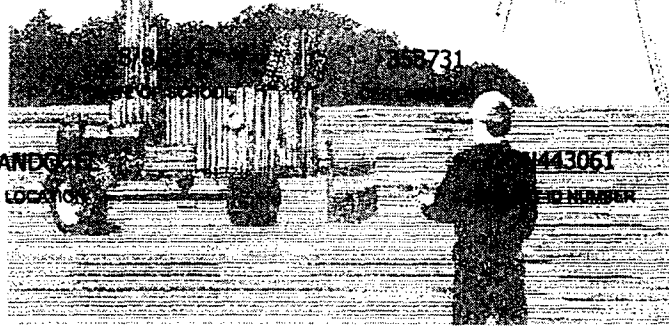
347660 GON443061

VISIBLE EMISSIONS EVALUATOR

This is to certify that

GREGORY GONZALES

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black targets did not exceed 7.5% opacity and no single error exceeding 15% opacity was measured during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue.



ORLANDO, FL
SCHOOL LOCATION

731

443051

MEMBER

GG Environmental Solutions, Inc.
1430 Sara L. Street
Kissimmee, Florida 34744-2771
Phone - (407) 932-0409
Fax - (407) 932-0409

PROCESS DATA SHEET

DATE August 13, 2007 TESTING TIME 7:40 AM to 8:32 AM

SOURCE INFORMATION

COMPANY Mack Concrete Industries, Inc.

ADDRESS 23902 County Road 561, Astatula, Florida

SOURCE IDENTIFICATION: FDEP Permit No. 0690066-003-AO Concrete Batch Plant
(Cement Storage Silo #1)

SOURCE LOCATION (IF DIFFERENT FROM ABOVE) _____

STATEMENT OF PROCESS WEIGHT

INPUT PROCESS RATE DURING TESTING TIME 29.9 ton/hr of cement dust

PRODUCTION RATE DURING TESTING TIME no batching was performed

Cement dust in tanker truck = 25.95 ton
Tanker pneumatic unloading pressure = 8 to 10 psi
Tanker unloading time to silo = 52 minutes

$$\frac{25.95 \text{ ton cement dust}}{52 \text{ minute unloading time}} \times \frac{60 \text{ minutes}}{\text{hour}} = 29.9 \text{ ton/hr cement dust loaded into storage silo}$$

I certify that the above statement is true to the best of my knowledge and belief.

Name Greg Liskey Signature 

Title General Manager Date 9-20-07

2

THIS SHIPPING ORDER

must be legibly filled in, in ink, in indelible Pencil, or in Carbon, and retained by the agent.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading



Suwannee American Cement Company • 5117 U.S. Hwy. 27, Branford, Florida, USA

The property described below, in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery of said destination, if on its route, otherwise to delivery to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all of any of said property over all or any portion or said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

This shipment is correctly described. Subject to verification by the EASTERN OR SOUTHERN WEIGHING & INSPECTION BUREAU according to agreement.

Suwannee American Cement

Shipper

This is the property of the shipper, and no reconignment or Diversion is to be made unless authorized by consignee.

If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight. NOTE: Where the rate is dependent on value, the shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically by the shipper to be not.

Subject to Section 7 of conditions of applicable bill of lading, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Suwannee American Cement

Per

(SIGNATURE OF CONSIGNOR)

If charges are to be prepaid, write or stamp here. To Be Prepaid: TO BE PREPAID

Received \$

to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per

(The signature here acknowledges only the amount prepaid)

Charges advanced: \$

WEIGHT

GROSS 38.340

TARE 12.390

NET 25.950

exceeding

Per

CONSIGNED TO/DESTINATION

SHIPPING PLANT AND DATE

CARRIER ROUTE

8804281 8085835
JACK CONCRETE - ASTATULA 1697

80841 08/16/2007

22803 COUNTRY ROAD 561
ASTATULA FL
34715

08/10/2007 155 14:04

1937147

COMMENTS / SPECIAL INSTRUCTIONS

WIDEWAYER SEAL 80068

WEIGHED BY: CSCALESUW1

DATE

CHECKED BY: FOREMAN

TH

CUSTOMER ORDER NO.

DELIVERY DATE & TIME

BILL OF LADING NO.

SEALS

CAR INITIALS/TRUCK NO.

FROM SHIP

08/10/2007 14:04

8000074675

130/220

3

PRODUCT CODE

QUANTITY WEIGHT

NO. PKGS.

COMMODITY

RATE

FREIGHT

4264081

51,900.00

25.95

Type I / II Portland Bulk

ASHTO

Suwannee American Cement

Shipper,

CUSTOMER REMARKS

RECEIVED AT DESTINATION - CUSTOMER / AGENT SIGNATURE

DATE

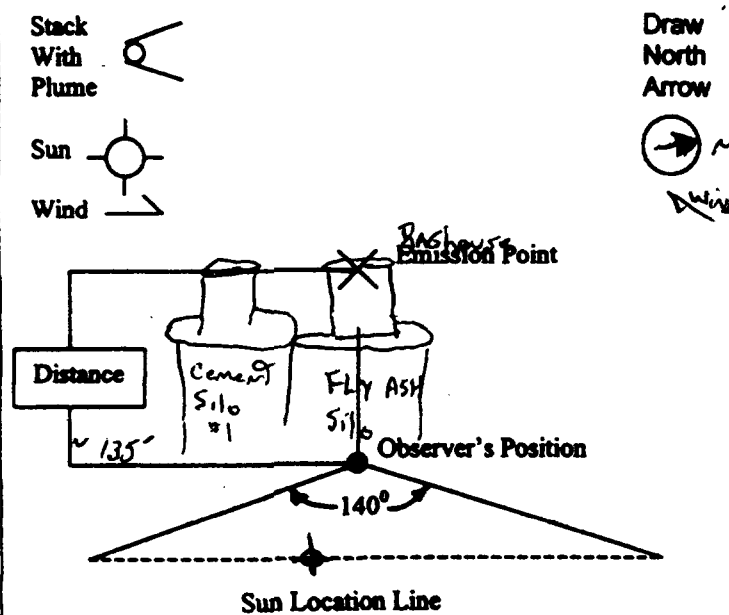
8-13-07

ARRIVAL TIME

AGENT

STATE OF FLORIDA Visible Emissions Observation Form

Source/Process Information				Opacity Readings									
FACILITY NAME				OBSERVATION				START TIME		STOP TIME			
MACK Concrete Industries				August 13, 2007				9:05 AM		10:24 AM			
SOURCE NAME		PERMIT NO		SEC	0	15	30	45	SEC	0	15	30	45
Fly ASH Silo		0690066-003-AD		MIN					MIN				
LOCATION / ADDRESS				1	0	0	0	0	31	0	0	0	0
23902 County Road 561, Astotula, Florida				2	0	0	0	0	32	0	0	0	0
CONTACT		PHONE NO		3	0	0	0	0	33	0	0	0	0
GREG Hickey		(352) 742-2333		4	0	0	0	0	34	0	0	0	0
PROCESS / PRODUCTION RATE				5	0	0	0	0	35	0	0	0	0
SEE Process Data Sheet				6	0	0	0	0	36	0	0	0	0
CONTROL EQUIPMENT		OPERATING MODE		7	0	0	0	0	37	0	0	0	0
Baghouse		Auto Pulse		8	0	0	0	0	38	0	0	0	0
FUEL TYPE / RATE	MATERIAL TYPE / RATE	PERMITTED RATE		9	0	0	0	0	39	0	0	0	0
N/A	Fly ASH	30 gms/hr		10	0	0	0	0	40	0	0	0	0
DESCRIBE EMISSION POINT				11	0	0	0	0	41	0	0	0	0
Exhaustial Vent				12	0	0	0	0	42	0	0	0	0
HEIGHT ABOVE GROUND LEVEL		HEIGHT TO OBSERVER		13	0	0	0	0	43	0	0	0	0
~ 45 ft		~ 39 ft		14	0	0	0	0	44	0	0	0	0
Emissions Description				15	0	0	0	0	45	0	0	0	0
DESCRIBE EMISSIONS				16	0	0	0	0	46	0	0	0	0
START		END		17	0	0	0	0	47	0	0	0	0
None		None		18	0	0	0	0	48	0	0	0	0
PLUME COLOR		PLUME TYPE		19	0	0	0	0	49	0	0	0	0
None				20	0	0	0	0	50	0	0	0	0
WATER DROPLETS PRESENT?		IF YES		21	0	0	0	0	51	0	0	0	0
YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		ATTACHED <input type="checkbox"/> DETACHED <input type="checkbox"/>		22	0	0	0	0	52	0	0	0	0
Meteorological Information				23	0	0	0	0	53	0	0	0	0
BACKGROUND		BACKGROUND COLOR		24	0	0	0	0	54	0	0	0	0
START		END		25	0	0	0	0	55	0	0	0	0
SKY		Same		26	0	0	0	0	56	0	0	0	0
SITE CONDITIONS / CLOUD COVER		AMBIENT TEMP		27	0	0	0	0	57	0	0	0	0
START		END		28	0	0	0	0	58	0	0	0	0
Clear		~ 80 F		29	0	0	0	0	59	0	0	0	0
WIND SPEED		WIND DIRECTION		30	0	0	0	0	60	0	0	0	0
START		END											
Variable		Same											
0-4 mph		FRANE											



Comments Recertified on 8-9-07 Awaiting Cert. From ETA
 Tanker pneumatic unloading pressure = 8 to 10 psi
 Tanker product = 27.0 tons
 * Stopped test at 9:40 AM to clear feed hose ** Resumed test at 10:05 AM
 no objectionable odors were detected during test period

EASTERN TECHNICAL ASSOCIATES
GREGORY GONZALES

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.

2/7/2007 8/9/2007 ORLF06
 DATE OF SCHOOL EXPIRATION DATE LAST LECTURE

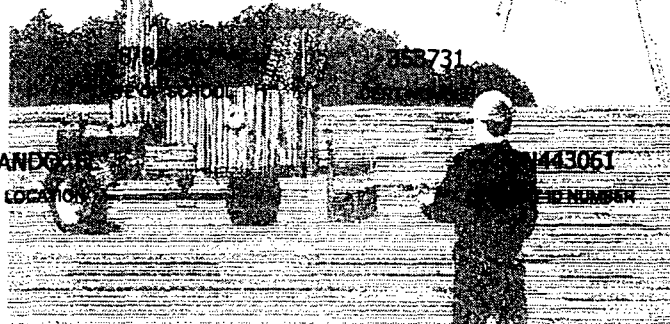
347660 GON443061

VISIBLE EMISSIONS EVALUATOR

This is to certify that

GREGORY GONZALES

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was measured during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue.



ORLANDO
SCHOOL EDUCATION

443051

IDENTIFICATION NUMBER

GG Environmental Solutions, Inc.
1430 Sara L. Street
Kissimmee, Florida 34744-2771
Phone - (407) 932-0409
Fax - (407) 932-0409

PROCESS DATA SHEET

DATE August 13, 2007 TESTING TIME 9:05 AM to 10:24 AM

SOURCE INFORMATION

COMPANY Mack Concrete Industries, Inc.

ADDRESS 23902 County Road 561, Astatula, Florida

SOURCE IDENTIFICATION: FDEP Permit No. 0690066-003-AO Concrete Batch Plant
(Fly Ash Storage Silo)

SOURCE LOCATION (IF DIFFERENT FROM ABOVE) _____

STATEMENT OF PROCESS WEIGHT

INPUT PROCESS RATE DURING TESTING TIME 30.00 ton/hr of cement dust

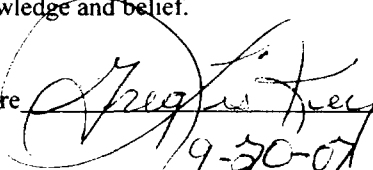
PRODUCTION RATE DURING TESTING TIME no batching was performed

Fly Ash dust in tanker truck = 27.00 ton
Tanker pneumatic unloading pressure = 8 to 10 psi
Tanker unloading time to silo = 54 minutes

$$\frac{27.00 \text{ ton cement dust}}{54 \text{ minute unloading time}} \times \frac{60 \text{ minutes}}{\text{hour}} = 30.00 \text{ ton/hr fly ash dust loaded into storage silo}$$

It should be noted that the tanker truck experienced a problem with the feed hose becoming clogged at 9:40 AM. Testing was stopped while hose problem was being fixed. Testing resumed at 10:05 AM and continued without incident until the truck finished pumping off load at 10:24 AM.

I certify that the above statement is true to the best of my knowledge and belief.

Name Greg Liskey Signature 

Title General Manager Date 9-20-07

BOL # 106513

This Memorandum is an acknowledgment that a Bill of Lading has been issued and is not the original Bill of Lading, nor a copy or duplicate covering the property named herein, and is intended solely for filing or record.

RECEIVED, subject to the classification and tariffs in effect on the date of the receipt by the carrier of the property described

now, in apparent good order, except as noted (contents and condition of contents or packages unknown), marked, consigned, and defined as indicated below, which said carrier (the word carrier being understood throughout this contract meaning any person or corporation in possession of the property under the contract) agreed to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classifications in effect on the date issued, if this is a rail or a water-rail shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment and the said terms and conditions are hereby agreed to by the shipper or accepted for himself and his assigns.

8/10/07

From: BORAL MATERIAL TECHNOLOGIES

CONSIGNEE Mack Concrete

DESTINATION Astatula

CARRIER Tidewater Trailer 1/2 203

CARRIER (2) _____ LID SEAL 1 _____

Truck Number 112 LID SEAL 2 _____

Truck License _____ SILO/BATCH 2

GROSS 79780

TARE 25780

NET 54000

NET TON/GAL 27.00

BORAL MATERIAL TECHNOLOGIES

WEIGHED BY _____ Deputy Weighmaster

If this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier may decline to make delivery of this shipment without payment of freight, and all other lawful charges.

BORAL MATERIAL TECHNOLOGIES _____
Signature of Consignor



PRODUCT DESCRIPTION: Crystal River Class F Flyash
Meets ASTM C 618, AASHTO M 295 and F. Dot Section 929

ADDITIONAL INSTRUCTIONS:

This shipment is correctly described and weighed.

Shipper, per _____ Authorized Agent

RECEIVED MATERIAL DESCRIBED ABOVE		
Carrier Signature <i>[Signature]</i>	Date 8-13-07	Time In
Consignee Signature <i>[Signature]</i>	Date	Time Out

BORAL MATERIAL TECHNOLOGIES
 45 Northeast Loop 410, Suite 700
 San Antonio, TX 78216
 Phone (210) 349-4069
 Fax (210) 349-8512

WEIGHMASTER CERTIFICATE IF APPLICABLE.

CUSTOMER COPY

STATE OF FLORIDA Visible Emissions Observation Form

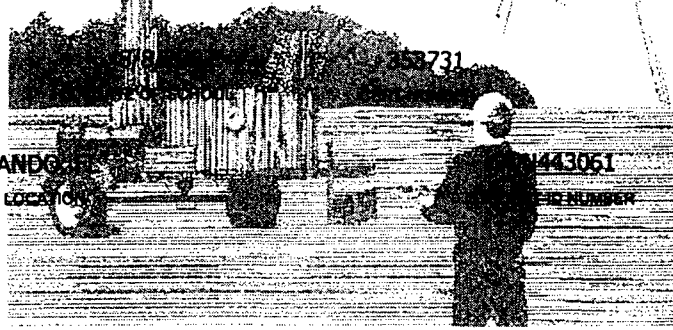
Source/Process Information				Opacity Readings										
FACILITY NAME				OBSERVATION				START TIME		STOP TIME				
MASK CONCRETE INDUSTRIES				August 13, 2007				11:00 am		11:54 am				
SOURCE NAME		PERMIT NO.		SEC	0	15	30	45	SEC	0	15	30	45	
Concrete Batch Plant		0690066-003-AD		MIN					MIN					
LOCATION / ADDRESS				1	0	0	0	0	31	0	0	0	0	
23902 County Road 561, Apopka, Florida				2	0	0	0	0	32	0	0	0	0	
CONTACT		PHONE NO.		3	0	0	0	0	33	0	0	0	0	
Greg Hickey		(352) 742-2333		4	0	0	0	0	34	0	0	0	0	
PROCESS / PRODUCTION RATE				5	0	0	0	0	35	0	0	0	0	
SEE Process Data Sheet				6	0	0	0	0	36	0	0	0	0	
CONTROL EQUIPMENT		OPERATING MODE		7	0	0	0	0	37	0	0	0	0	
Baghouse		Auto Pulse		8	0	0	0	0	38	0	0	0	0	
FUEL TYPE/RATE	MATERIAL TYPE/RATE	PERMITTED RATE		9	0	0	0	0	39	0	0	0	0	
N/A	Cement dust	30 Tons/hr		10	0	0	0	0	40	0	0	0	0	
DESCRIBE EMISSION POINT				11	0	0	0	0	41	0	0	0	0	0
Rectangular vent				12	0	0	0	0	42	0	0	0	0	
HEIGHT ABOVE GROUND LEVEL		HEIGHT TO OBSERVER		13	0	0	0	0	43	0	0	0	0	
~50 ft		~42 ft		14	0	0	0	0	44	0	0	0	0	
Emissions Description				15	0	0	0	0	45	0	0	0	0	
DESCRIBE EMISSIONS				16	0	0	0	0	46	0	0	0	0	
START NONE END NONE				17	0	0	0	0	47	0	0	0	0	
PLUME COLOR		PLUME TYPE		18	0	0	0	0	48	0	0	0	0	
NONE		NONE		19	0	0	0	0	49	0	0	0	0	
WATER DROPLETS PRESENT?		IF YES		20	0	0	0	0	50	0	0	0	0	
YES ___ NO <u>X</u>		ATTACHED ___ DETACHED ___		21	0	0	0	0	51	0	0	0	0	
Meteorological Information				22	0	0	0	0	52	0	0	0	0	
BACKGROUND		BACKGROUND COLOR		23	0	0	0	0	53	0	0	0	0	
START SKY END Same		START Blue END Same		24	0	0	0	0	54	0	0	0	0	
SITE CONDITIONS/CLOUD COVER		AMBIENT TEMP		25	0	0	0	0	55	0	0	0	0	
START 10% cloudy END Same		START ~85°F END ~89°F		26	0	0	0	0	56	0	0	0	0	
WIND SPEED VARIABLE		WIND DIRECTION		27	0	0	0	0	57	0	0	0	0	
START 0-4 mph END Same		START From NNE END Same		28	0	0	0	0	58	0	0	0	0	
Observation Data, Site Diagram				29	0	0	0	0	59	0	0	0	0	
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>Stack With Plume </p> <p>Sun </p> <p>Wind </p> </div> <div style="width: 45%;"> <p>Draw North Arrow </p> </div> </div>				30	0	0	0	0	60	0	0	0	0	
Comments				EASTERN TECHNICAL ASSOCIATES										
Recertified on 8-9-07 Awaiting Certificate from ETA				GREGORY GONZALES										
Tanker Pneumatic unloading pressure = 8 To 10 PSI				met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black smoke did not exceed 7.5% opacity and no single error exceeding 15% opacity was incurred during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certificate is valid for six months from date of issue and expires on the date below.										
Tanker Product = 26.67 Tons				2/7/2007			8/9/2007			ORLF06				
NO objectionable odors were detected during test period.				DATE OF SCHOOL			EXPIRATION DATE			LAST LECTURE				
				347660			GON443061							

VISIBLE EMISSIONS EVALUATOR

This is to certify that

GREGORY GONZALES

met the specifications of Federal Reference Method 9 and qualifies as a visible emissions evaluator. Maximum deviation on white and black pens did not exceed 7.5% opacity and no single error exceeding 15% opacity was measured during the certification test conducted by Eastern Technical Associates of Raleigh, NC. This certification is valid for six months from date of issue.



ORLANDO
SCHOOL LOCATION

58731

443061

ID NUMBER

GG Environmental Solutions, Inc.
1430 Sara L. Street
Kissimmee, Florida 34744-2771
Phone - (407) 932-0409
Fax - (407) 932-0409

PROCESS DATA SHEET

DATE August 13, 2007 TESTING TIME 11:00 AM to 11:54 AM

SOURCE INFORMATION

COMPANY Mack Concrete Industries, Inc.

ADDRESS 23902 County Road 561, Astatula, Florida

SOURCE IDENTIFICATION: FDEP Permit No. 0690066-003-AO Concrete Batch Plant
(Cement Storage Silo #2)

SOURCE LOCATION (IF DIFFERENT FROM ABOVE) _____

STATEMENT OF PROCESS WEIGHT

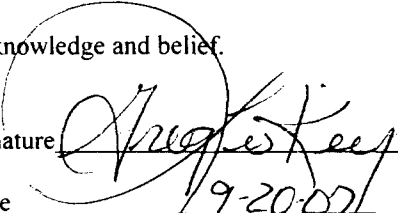
INPUT PROCESS RATE DURING TESTING TIME 29.6 ton/hr of cement dust

PRODUCTION RATE DURING TESTING TIME no batching was performed

Cement dust in tanker truck = 26.67 ton
Tanker pneumatic unloading pressure = 8 to 10 psi
Tanker unloading time to silo = 54 minutes

$$\frac{26.67 \text{ ton cement dust}}{54 \text{ minute unloading time}} \times \frac{60 \text{ minutes}}{\text{hour}} = 29.6 \text{ ton/hr cement dust loaded into storage silo}$$

I certify that the above statement is true to the best of my knowledge and belief.

Name Greg Liskey Signature 

Title General Manager Date 9-20-07

2

THIS SHIPPING ORDER must be legibly filled in, in ink, in indelible Pencil, or in Carbon, and retained by the agent.

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading



Suwannee American Cement Company • 5117 U.S. Hwy. 27, Branford, Florida, USA

The property described below, in apparent good order, except as noted (contents and conditions of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier be understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery of said destination, if on its route, otherwise to delivery to and carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any portion of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-car shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

This shipment is correctly described. Subject to verification by the EASTERN OR SOUTHERN WEIGHING & INSPECTION BUREAU according to agreement.

Suwannee American Cement Shipper

This is the property of the shipper, and no recognition or Diversion is to be made unless authorized by consignee.

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE: Where the rate is dependent on value, the shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically by the shipper to be not.

Subject to Section 7 of conditions of applicable bill of lading, if the shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Suwannee American Cement

Per (SIGNATURE OF CONSIGNOR)

If charges are to be prepaid, write or stamp here. "To Be Prepaid." TO BE PREPAID

Received \$ to apply in prepayment of the charges on the property described hereon.

Agent or Cashier

Per (The signature here acknowledges only the amount prepaid)

Exceeding Per

CONSIGNEE TO/DESTINATION

SHIPPING PLANT AND DATE

CARRIER ROUTE

5904281 5096535
BAGG CONCRETE - ASTATULA4607

BOB41 08/11/2007

25902 COUNTRY ROAD 561
ASTATULA FL
34705

08/11/2007 189 18:45

1937328

Charges advanced: \$

WEIGHT

GROSS 39.450

TARE 12.790

NET 26.670

COMMENTS / SPECIAL INSTRUCTIONS

TIDEWATER SEAL 30089

WEIGHED BY

CSCALESUW1

DATE

CHECKED BY/FOREMAN

CUSTOMER ORDER NO.

DELIVERY DATE & TIME

BILL OF LADING NO.

SEALS

CAR INITIALS/TRUCK NO.

FROM S

08/11/2007 13:45

8000082937

116/201

3

PRODUCT CODE

QUANTITY WEIGHT

NO. PKGS.

COMMODITY

RATE

FREIGHT

4254081

53,340.00

26.67 Type I / II Portland Bulk

ASHTO

Suwannee American Cement Shipper

CUSTOMER REMARKS

RECEIVED AT DESTINATION - CUSTOMER / AGENT SIGNATURE

DATE

ARRIVAL TIME

Agent

[Handwritten signature]

[Handwritten signature]

[Handwritten signature]

Attachment 6

**Mack Concrete Industries, Inc.
Copy of Current
FDEP Permit No. 0690066-003-AO**



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

NOTICE OF PERMIT

E-CORRESPONDENCE

qliskey@mackconcrete.com

Mack Concrete Industries, Inc.
23902 County Road 561
Astatula, Florida 34705

Attention: Greg Liskey, General Manager

Lake County - AP
Concrete Batch Plant
DEP File Number: 0690066-003-AO

Dear Mr. Liskey:

Enclosed is Permit Number 0690066-003-AO to operate the above-referenced source issued pursuant to Section(s) 403.087, Florida Statutes.

A person whose substantial interests are affected by this permit may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000, within 14 days of receipt of this Permit. Petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. Failure to file a petition within this time period shall constitute a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

The petition shall contain the following information:

- (a) The name, address, and telephone number of each petitioner, the applicant's name and address, the Department permit file number and the county in which the project is proposed;
- (b) A statement of how and when each petitioner received notice of the Department's action or proposed action;
- (c) A statement of how each petitioner's substantial interests are affected by the Department's action or proposed 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 Department's action or proposed action;
- (f) A statement of which rules or statutes petitioner contends require reversal or modification of the Department's action or proposed action; and

"More Protection, Less Process"

Printed on recycled paper.

- (g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

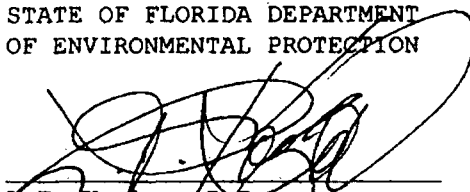
If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any decision of the Department with regard to the application 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 14 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 Section 120.57, F.S., 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 28-5.207, F.A.C.

This permit is final and effective on the date filed with the Clerk of the Department unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition and conforms to Rule 62-103.070, F.A.C. Upon timely filing of a petition or a request for an extension of time this permit will not be effective until further Order of the Department.

When the Order (Permit) is final, any party to the Order has the right to seek judicial review of the Order pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the Department in the Office of General Counsel, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date the Final Order is filed with the Clerk of the Department.

Executed in Orlando, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Date: 12-2-02

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to §120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

AK
JR

Devin Jones Dec. 3, 2002
Clerk Date

LTK/jar

Copy provided to:

Gregory R. Gonzales, Environmental Scientist
Ecology and Environment, Inc.
ggonzales@ene.com

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on 12/03/02 to the listed persons, by D. Jones.



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

Permittee:
Mack Concrete Industries, Inc.
23902 Couny Road 561
Astatula, Florida 34705

Atten: Greg Liskey, General Manager

Facility Number: 0690066
Permit Number: 0690066-003-AO
Expiration Date: November 30, 2007
County: Lake
Latitude/Longitude:
28° 41' 25"N/81° 43' 49"W
Project: Concrete Batch Plant

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

The permittee can operate a concrete batch plant which includes a flyash silo and two cement storage silos. Each silo has a Standley Batch Systems, Inc. baghouse with an air to cloth ratio of 3 to 1 and a particulate removal efficiency of approximately 99.9 percent.

This facility is located at 23902 County Road 561, Astatula, Lake County, Florida.

General Conditions, which are pages 2 and 3, are mailed only to the permittee.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes (F.S.) The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup and auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of this permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

GENERAL CONDITIONS:

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
11. This permit is transferable only upon Department approval in accordance with Rule 62-4.120 and Rule 62-730.300, Florida Administrative Code (F.A.C.), as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. This permit also constitutes:
 - () Determination of Best Available Control Technology (BACT)
 - () Determination of Prevention of Significant Deterioration (PSD)
 - () Certification of compliance with State Water Quality Standards (Section 401, PL 92-500)
 - () Compliance with New Source Performance Standards
14. The permittee shall comply with the following:
 - (a) Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - (b) The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring information) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
 - (c) Records of monitoring information shall include:
 1. The date, exact place, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The dates analyses were performed;
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses.
15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

Permittee:
Mack Concrete Industries, Inc.

Permit Number 0690066-003-AO
Expiration Date: November 30, 2007

OPERATING CONDITIONS

1. The batch plant is permitted to operate a maximum of 2142 hours per consecutive 12 months.
[Rule 62-210.200(203), F.A.C. - (PTE)]
2. All reasonable precautions shall be taken to prevent emissions of unconfined particulate matter. Reasonable precautions shall include, but not to be limited to, the following [Rule 62-296.320(4)(c), F.A.C.]:
 - a) Application of water when necessary to control emissions.
 - b) Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
 - c) Enclosure or covering of conveyor systems
 - d) Curtailing of operation if winds are entraining unconfined particulate matter.
 - e) Use of a spray bar or chute to mitigate emissions at the drop point to the truck.
3. No person shall circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly.
[Rule 62-210.650, F.A.C.]

EMISSION MONITORING AND APPLICABLE TEST PROCEDURES

4. Emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment shall be controlled to the extent necessary to limit visible emissions to 5 percent opacity.
[Rule 62-296.414(1), F.A.C.]
5. Each dust collector exhaust point shall be tested for visible emissions at least ninety (90) days prior to the permit expiration date.
6. Each dust collector exhaust point shall be tested by a certified observer in accordance with DEP Method 9 for a minimum of 30 minutes or, if the operation is normally completed within less than 30 minutes and does not recur within that time, the test shall last for the length of the silo loading operation.
[Rules 62-296.414(3) and 62-297.310(4)(a)2.a., F.A.C.]
7. At least 15 days prior to the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the air compliance section of this office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and telephone number of the person conducting the test.
[Rule 62-297.310(7)(a)9., F.A.C.]

Permittee:
Mack Concrete Industries, Inc.

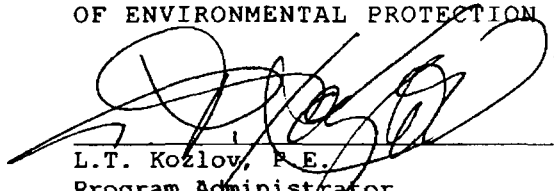
Permit Number 0690066-003-A0
Expiration Date: November 30, 2007

8. Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. The maximum operation rate (loading rate-cement dust or fly ash unloaded to silo) is 30 tons per hour. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity.
[Rule 62-297.310(2), F.A.C.]
9. Reports of the required compliance tests shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.
[Rule 62-297.310(8)(b), F.A.C.]

PERMIT APPLICATION

10. At least sixty days prior to the expiration date of this permit, the permittee shall submit to this office four air permit applications, DEP Form No. 62-210.900(4), along with the processing fee established in Rule 62-4.050(4), F.A.C.
[Rule 62-4.090, F.A.C.]

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



L.T. Kozlov, P.E.
Program Administrator
Air Resources Management

Issued: 12-2-02

October 03, 2007

Mr. Dick Dibble, P.E.
Division of Air Resource Management
Florida Department of Environmental Protection
Receipts
Post Office Box 3070
Tallahassee, Florida 32315-3070

RECEIVED
OCT 09 2007
Bureau of Air Monitoring
& Mobile Sources

Mack Concrete Industries, Inc.
Concrete Batch Plant Operation

Dear Mr. Dibble:

To confirm today's telephone conversation, this correspondence is being submitted at the request of our client Mack Concrete Industries, Inc. Please find enclosed:

1. Four (4) copies of FDEP Form No. 62-210.920(2)(b) Division of Air Resource Management Air General Permit Registration Form for Non Title V Source Notification to Use Air General Permit for the subject source.
2. Mack Concrete Industries, Inc. Check Number 3780 (dated October 2, 2007), in the amount of \$100.00, made payable to the Florida Department of Environmental Protection, for the application-processing fee necessary to obtain the five-year operating air permit.

Should you have any questions, please do not hesitate to contact me at (407) 932-0409 or my "E-Mail" address: ggonzales5@cfl.rr.com.

Sincerely,

GG ENVIRONMENTAL SOLUTIONS, INC.



Gregory R. Gonzales
President
1430 Sara L. Street
Kissimmee, Florida 34744-2771

Enclosures: a/s

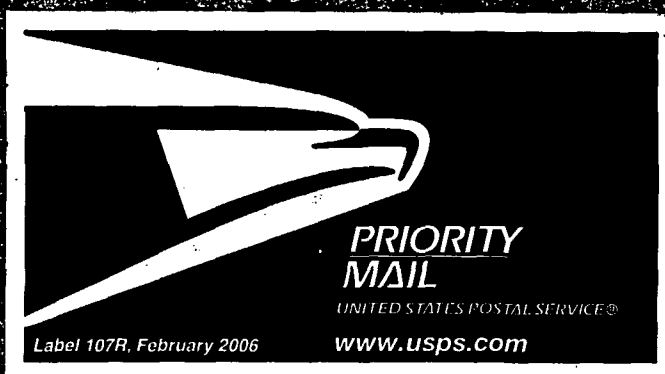
cc: Greg Liskey, V.P./ General Manager – Mack Concrete Industries, Inc.

GRG\C: Project files\Mack Concrete Industries\operatingpermit_10/03/07DEP1.doc

**Mr. Gregory R. Gonzales
GG Environmental Solutions, Inc.
1430 Sara L. Street
Kissimmee, Florida 34744-2771**

7006 2760 0003 4020 8335

Return to
Sender's Address
Where Delivered



**Mr. Dick Dibble, P.E.
Division of Air Resource Management
Florida Department of Environmental Protection
Receipts
Post Office Box 3070
Tallahassee, Florida 32315-3070**