

P 938 762 825

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

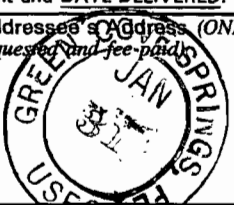
PS Form 3800, June 1985

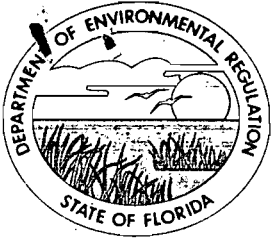
Sent to	Mr. Joseph C. Luke, Gate
Street and No.	Roofing Mfg.
P.O. Box	716
P.O. State and ZIP Code	Green Cove Springs, FL 32043
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$

Postmark or Date Mailed: 1-30-90
Permit: AC 10-171231

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Joseph C. Luke, President Gate Roofing Mfg., Inc. P. O. Box 716 Green Cove Springs, FL 32043	4. Article Number P 938 762 825
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature - Address X <i>D Coleman</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X <i>[Signature]</i>	
7. Date of Delivery <i>1/31/90</i>	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION NOTICE OF PERMIT

Mr. Joseph C. Luke, President
Gate Roofing Mfg., Inc.
Post Office Box 716
Green Cove Springs, Florida 32043

January 29, 1990

Enclosed is construction permit No. AC 10-171231 to construct an asphalt storage tank at your facility in Green Cove Springs, Clay County, Florida. This permit is issued pursuant to Section 403, Florida Statutes.

Any party to this permit has the right to seek judicial review of the permit 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, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400; 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 this permit is filed with the Clerk of the Department.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copy furnished to:

- A. Kutyna, NE District
- L. Stebbins, P.E.
- W. Martensen, GRMI

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF PERMIT and all copies were mailed before the close of business on 1-30-90.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Kenn Jaben
Clerk

1-30-90
Date

Final Determination

Gate Roofing Mfg., Inc.
Clay County
Green Cove Springs, Florida

Asphalt Storage Tank
Permit No. AC 10-171231

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

January 25, 1990

Final Determination

The construction permit application has been reviewed by the Department. Public notice of the Department's Intent to Issue was published in the Clay Today newspaper on December 15, 1989. The Technical Evaluation and Preliminary Determination were available for public inspection at the Department's Northeast District office in Jacksonville and The Department's Bureau of Air Regulation office in Tallahassee.

No comments were received during the public notice period. Therefore, the final action of the Department will be to issue the construction permit as drafted.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Gate Roofing Mfg., Inc.

Post Office Box 716

Green Cove Springs, FL 32043

Permit Number: AC 10-171231

Expiration Date: December 31, 1990

County: Clay

Latitude/Longitude: 29°58'55"N
81°40'17"W

Project: Asphalt Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. 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:

For the installation of an asphalt storage tank. This project will be located at the applicant's facility in Green Cove Springs, Clay County, Florida. The UTM coordinates of this site are Zone 17, 435.2 km E and 3,316.8 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on October 9, 1989.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

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 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. 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), Florida Statutes, 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 the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement 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.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 or 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 a reasonable time, 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 the conditions of the 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 non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

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.

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 proscribed by Sections 403.73 and 403.111, Florida Statutes. 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 Florida Administrative Code Rules 17-4.120 and 17-30.300, 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:

Compliance with New Source Performance Standards (NSPS)

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.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

- 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 instrumentation) 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:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - 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 that 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.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
2. The asphalt storage tank shall have a maximum capacity of 15,000 gallons and shall be allowed to operate for up to 8,760 hours per year.
3. Visible emissions from the asphalt storage tank shall not be greater than 0% opacity except for one consecutive 15-minute period in any 24-hour period when the transfer lines are blown for

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

clearing. Compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

4. No asbestos or other hazardous materials shall be used in the production of the purchased asphalt or in the production of asphalt cement.

5. The compliance test shall be conducted within 30 days after operation begins and the results reported to the Department's Northeast District office before this construction permit expires. The district office shall be notified at least 15 days in advance of the test and at least 5 days prior to the tank being placed in operation.

6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

7. An application for an operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this 26 day
of January, 1990

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION


Dale Twachtmann, Secretary



RECEIVED

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

JAN 26 1990

For Routing To Other Than The Addressee	
_____	Location: _____
_____	Location: _____
_____	Location: _____
From: _____	Date: _____

Office of the Secretary
Interoffice Memorandum

TO: Dale Twachtmann

for FROM: Steve Smallwood *Steve Smallwood*

DATE: January 25, 1990

SUBJ: Approval of Construction Permit No. AC 10-171231
Gate Roofing Mfg., Inc.

Attached for your approval and signature is a permit prepared by the Bureau of Air Regulation for the above mentioned company to construct an asphalt storage tank at their facility in Green Cove Springs, Clay County, Florida.

No comments were received during the public notice period.

Day 90, after which this permit will be issued by default, is February 6, 1990.

I recommend your approval and signature.

SS/JR/plm

Attachments

Check Sheet

Company Name: Gate Roofing Mfg. Inc Cross References:

Permit Number: AC 10-171231

PSD Number:

Permit Engineer:

Application:

- Initial Application
 - Incompleteness Letters
 - Responses
 - Waiver of Department Action
 - Department Response
 - Other

Intent:

- Intent to Issue
- Notice of Intent to Issue
- Technical Evaluation
- BACT Determination
- Unsigned Permit *ex*

Correspondence with:

- EPA
- Park Services
- Other *exemption*

Proof of Publication

- Petitions - (Related to extensions, hearings, etc.)
- Waiver of Department Action
- Other

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination
- Other

Post Permit Correspondence:

- Extensions/Amendments/Modifications
- Other

P 256 396 162

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	Joseph C. Luke
Street and No.	Gate Roofing
P.O. State and ZIP Code	P.O. Box 716
Postage	Green Cove Sp, FL
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	8-16-90
	AC10-171231

* U.S.G.P.O. 1989-234-555

PS Form 3800, June 1985

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to:
Joseph C. Luke, Pres.
Gate Roofing Mfg. Inc.
P.O. Box 716
Green Cove Springs, FL
32043

4. Article Number
P 256 396 162

Type of Service:
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

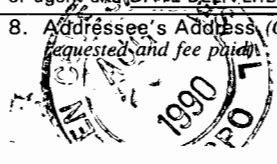
Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature - Addressee
 Signature of Agent
 * Debbie Estelman

6. Signature - Agent

7. Date of Delivery
8-20-90

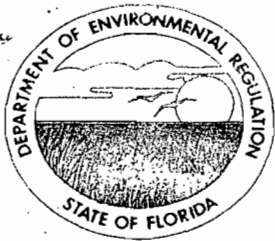
8. Addressee's Address (ONLY if requested and fee paid)



PS Form 3811, Apr. 1989

* U.S.G.P.O. 1989-238-815

DOMESTIC RETURN RECEIPT



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

August 14, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph C. Luke, President
Gate Roofing Mfg., Inc.
Post Office Box 716
Green Cove Springs, Florida 32043

Dear Mr. Luke:

The Department received your request for an extension of the expiration date for the construction permit referenced below. The request is acceptable and the following shall be changed:

Project: AC 10-171231

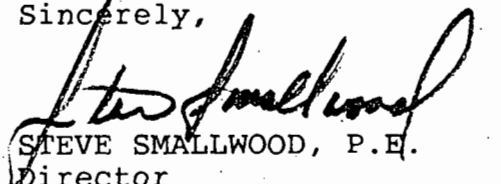
From: December 31, 1990
To: December 31, 1992

Attachment to be Incorporated:

Letter from W. W. Martensen dated July 16, 1990, requesting a change in the expiration date.

A copy of this letter must be attached to the above construction permit and shall become a part of this permit.

Sincerely,


STEVE SMALLWOOD, P.E.
Director
Division of Air Resources
Management

SS/JR/plm

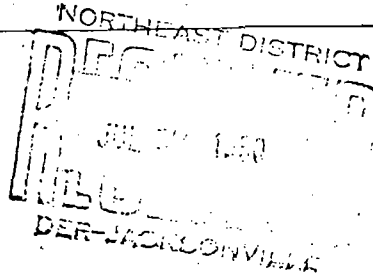
c: A. Kutyna, NE Dist.
L. Stebbins, P.E.
W. Martensen, GRMI

Best Available Copy



Roofing Mfg.

July 16, 1990



Mr. Andrew G. Kutyna, P.E.
Northeast District
Florida DER
3426 Bills Road
Jax, FL 32207

SUBJ: Request to Extend Expiration of Construction Permit No. AC 10-171231
Asphalt Storage Tank

Dear Mr. Kutyna:

In accordance with paragraph 6 in the "Specific Conditions" section of our Construction Permit dated January 26, 1990, Gate Roofing Mfg. requests an extension of the expiration date of our Construction Permit from 12/31/90 to 12/31/92. The asphalt tank is fastened to a pad but is not piped in or attached to any power source. This tank is to support a new business, which has not reached the needed volume levels to support the overhead expense of operating this tank.

This letter is also to advise you the asphalt tank is not in operation and your following letters are not applicable:

7/11/90 - Request fo VE test by 8/15/90

7/12/90 - Certified letter requesting will apply for an operating permit

Thanking you in advance for the permit extension.

Best regards,

A handwritten signature in cursive script that reads "W.W. Martensen".

W.W. Martensen

WM/dac

cc: Lloyd Stebbins



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Steve Smallwood
FROM: Clair Fancy *CF*
DATE: August 14, 1990
SUBJ: Amendments to Construction Permit No. AC 10-171231
Gate Roofing Mfg., Inc.

Attached for your approval and signature is a letter extending the expiration date for the above referenced construction permit.

The Bureau recommends approval of this amendment.

CF/JR/plm

Attachment

OK / [Signature]
8-14

DEPARTMENT OF ENVIRONMENTAL REGULATION

F - - - - -

JUL 31 1990

DER-BAQM

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Barry Andrews, DARM, BAR

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

Returned from vacation today.

This request for ext'n of CP # AC10-171231 is for Gate Roofing Mfg. asphalt storage tanks.

INFORMATION

Review & Return

Review & File

Initial & Forward

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

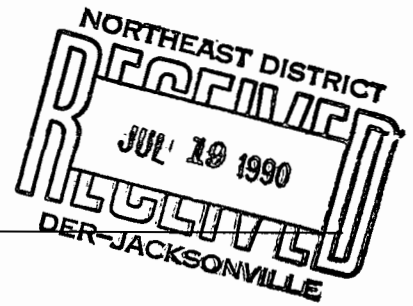
FROM:

Johnny C.

DATE

07-27-90

PHONE



Roofing Mfg.

July 18, 1990

Mr. Andrew G. Kutyna, P.E.
Northeast District
Florida DER
3426 Bills Road
Jacksonville, FL 32207

SUBJ: Construction Permit No. AC 10-171231

Dear Mr. Kutyna:

Supplementing my July 16, 1990 letter to you regarding an extension of our subject permit.

In the event we complete construction to make the asphalt tank operational, you and DER will be notified prior to operation. In addition, we would schedule a VE test soon thereafter.

Should you have questions or need additional information please contact me.

Best regards,

A handwritten signature in cursive script that reads "W.W. Martensen".

W.W. Martensen

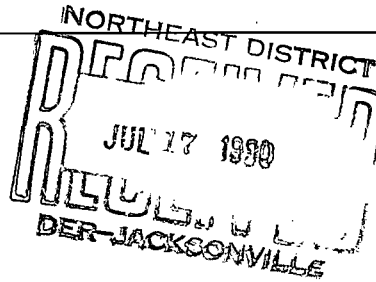
WM/dac

cc: Fred Becker
John Cannon
Lloyd Stebbins
G. Reynolds



Roofing Mfg.

July 16, 1990



Mr. Andrew G. Kutyna, P.E.
Northeast District
Florida DER
3426 Bills Road
Jax, FL 32207

SUBJ: Request to Extend Expiration of Construction Permit No. AC 10-171231
Asphalt Storage Tank

Dear Mr. Kutyna:

In accordance with paragraph 6 in the "Specific Conditions" section of our Construction Permit dated January 26, 1990, Gate Roofing Mfg. requests an extension of the expiration date of our Construction Permit from 12/31/90 to 12/31/92. The asphalt tank is fastened to a pad but is not piped in or attached to any power source. This tank is to support a new business, which has not reached the needed volume levels to support the overhead expense of operating this tank.

This letter is also to advise you the asphalt tank is not in operation and your following letters are not applicable:

7/11/90 - Request fo VE test by 8/15/90

7/12/90 - Certifed letter requesting will apply for an operating permit

Thanking you in advance for the permit extension.

Best regards,

W.W. Martensen

WM/dac

cc: Lloyd Stebbins



Roofing Mfg.

December 21, 1989

Mr. Bill Thomas
Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Rd.
Tallahassee, FL 32399-2400

SUBJ: DER File No. AC10-171231
Publication of Notice of Intent to Issue Permit

Dear Mr. Thomas:

Enclosed is the official affidavit of publication of the subject Intent to Issue Permit which appeared in the Clay Today on December 15, 1989.

Thank you for your assistance.

Best regards,

W.W. Martensen
Vice President/
General Manager

WM/dac

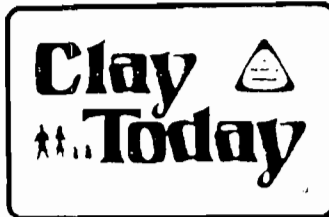
Enclosure

cc: A. Kutyna - DER NE District
L. Stebbins - Missimer & Associates
J. Reynolds

RECEIVED
DEC 26 1989

Date of Invoice 12/15/89

MONTH December



1564 Kingsley Avenue
P.O. Box 1209
Orange Park, Florida 32073
Phone 904-264-3200

Your Advertising Representative is:

DATE	CLAY TODAY	CLAY COUNTIAN
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15	Fri.	
16		
17	/	
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		
Total		

Gate Roofing Mtg, Inc
P.O. Box 716
Green Cove Springs, Fl 32043

PAYABLE WITHIN 10 DAYS OF RECEIPT

DISPLAY ADVERTISING _____ @ _____		
Legal # 005911 State of Florida Dept. of	54	40
Enviromental Regulation Notice of intent to		
issue		
CLAY COUNTIAN _____ @ _____		
TOTAL	54	40
PAST DUE/CREDIT		
TOTAL AMOUNT DUE	54	40

T05164

CLAY TODAY
Published Daily
(except Saturday and Sunday)

Orange Park
of Clay County, Florida

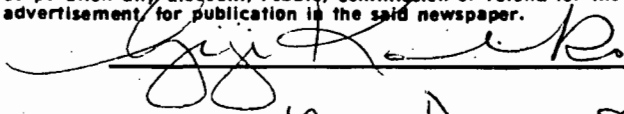
STATE OF FLORIDA } SS.
COUNTY OF CLAY

Before the undersigned authority personally appeared Gigi Kosalko
who on oath says that he is Advertising Manager

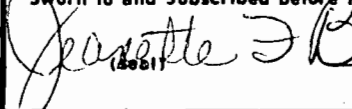
of Clay Today, a daily newspaper published at Orange Park in Clay County, Florida;
that the attached copy of advertisement, being a Legal Notice
in the matter of Legal # 005911 State of Florida Dept. of
Environmental Regulation Notice of Intent to issue

in the _____ Court,
was published in said newspaper in the issues of Fri. Dec 15, 1989

Affiant further says that Clay Today is a newspaper published at Orange Park, in
said Clay County, Florida, and that the said newspaper has heretofore been con-
tinuously published in said Clay County, Florida, each day, except Saturdays and
Sundays, under the name of "Clay Today", and has been entered as second class mail
matter at the post office in the Town of Orange Park, in said Clay County, Florida, for
a period of one year next preceding the first publication of the attached copy of ad-
vertisement and affiant further says that he has neither paid nor promised any
person, firm or corporation any discount, rebate, commission or refund for the purpose
of securing this advertisement for publication in the said newspaper.



Sworn to and Subscribed before me this 19 day of Dec 19 89 A.D.



Notary Public, State of Florida at Large
My Commission Expires March 24, 1990

State of Florida
Department of Environmen-
tal Regulation
**NOTICE OF INTENT
TO ISSUE**
The Department of Environ-
mental Regulation hereby
gives notice of its intent to is-
sue a permit to Gate Roofing
Mfg. Inc. to construct/install
an asphalt storage tank at
their facility in Green Cove
Springs, Clay County, Flori-
da. A determination of Best
Available Control Technol-
ogy (BACT) was not re-
quired. The Department is
issuing this intent to issue
for the reasons stated in the
Technical Evaluation and
Preliminary Determination.
A person whose substantial
interests are affected by the
Department's proposed per-
mitting decision may petition
for an administrative pro-
ceeding (hearing) in accor-
dance 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 2600 Blair
Stone Road, Tallahassee,
Florida 32399-2400, within
fourteen (14) days of publi-
cation of this notice. Peti-
tioner 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 consti-
tute a waiver of any right
such person may have to re-
quest an administrative de-
termination (hearing) under
Section 120.57, Florida Sta-
tutes.
The Petition shall contain the
following information:
(a) The name, address, and
telephone number of each
petitioner, the applicant's

name and address, the De-
partment Permit File Number
and the county in which the
project is proposed;
(b) A statement of how and
when each petitioner re-
ceived notice of the Depart-
ment's action or proposed
action;
(c) A statement of how each
petitioner's substantial inter-
ests are affected by the De-
partment's action or pro-
posed action;
(d) A statement of the mate-
rial facts disputed by Peti-
tioner, if any;
(e) A statement of facts
which petitioner contends
warrant reversal or modifica-
tion of the Department's ac-
tion or proposed action;
(f) A statement of which
rules or statutes petitioner
contends require reversal or
modification of the Depart-
ment's action or proposed
action; and
(g) A statement of the relief
sought by petitioner, stating
precisely the action peti-
tioner wants the Department
to take with respect to the
Department's action or pro-
posed action.
If a petition is filed, the ad-
ministrative hearing process
is designed to formulate
agency action. Accordingly,
the Department's final action
may be different from the po-
sition taken by it in this No-
tice. Persons whose sub-
stantial interests will be af-
fected by any decision of the
Department with regard to
the application have the right
to petition to become a party
to the proceeding. The peti-
tion must conform to the re-
quirements specified above
and be filed (received) within
14 days of publication of this
notice in the Office of Gen-
eral Counsel at the above
address of the Department.
Failure to petition within the
allowed time frame consti-
tutes a waiver of any right
such person has to request
a hearing under Section
120.57, F.S., and to partici-
pate as a party to this pro-
ceeding. Any subsequent in-
tervention will only be at the
approval of the presiding of-
ficer upon motion filed pur-
suant to Rule 28-
5.207, F.A.C.
The application is available
for public inspection during
business hours, 8:00 a.m. to
5:00 p.m., Monday through
Friday, except legal holi-
days, at:
Department of Environmen-
tal Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-
2400
Department of Environmen-
tal Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207-0909
Any person may send writ-
ten comments on the pro-
posed action to Mr. Bill Tho-
mas at the Department's
Tallahassee address. All
comments mailed within 14
days of the publication of
this notice will be considered
in the Department's final de-
termination.
Legal No. 005911 pub-
lished Friday, December
15, 1989, in Clay County's
daily Clay Today newspa-
per.

BEST AVAILABLE COPY

PS Form 3800, June 1985

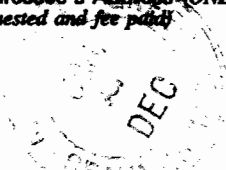
RECEIPT FOR CERTIFIED MAIL
 NO INSURANCE COVERAGE PROVIDED
 NOT FOR INTERNATIONAL MAIL
 (See Reverse)

P 938 762 781

Sent to Mr. Joseph C. Luke, Gate Street and No P.O. Box 716 P.O. State and ZIP Code Green Cove Springs, FL 32043	Roofing Mfg. \$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed; 12-6-89 Permit: Exemption	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
 Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to:</p> <p>Mr. Joseph C. Luke, President Gate Roofing Mfg., Inc. P. O. Box 716 Green Cove Springs, FL 32043</p>	<p>4. Article Number</p> <p>P 938 762 781</p> <p>Type of Service:</p> <table style="width: 100%;"> <tr> <td><input type="checkbox"/> Registered</td> <td><input type="checkbox"/> Insured</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified</td> <td><input type="checkbox"/> COD</td> </tr> <tr> <td><input type="checkbox"/> Express Mail</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> </table> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>	<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Registered	<input type="checkbox"/> Insured						
<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD						
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise						
<p>5. Signature - Addressee</p> <p><i>Joseph C. Luke</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p> <div style="text-align: center;">  </div>						
<p>6. Signature - Agent</p> <p>X</p>							
<p>7. Date of Delivery</p> <p>12-7 789</p>							



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 30, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Joseph C. Luke, President
Gate Roofing Mfg., Inc.
Post Office Box 716
Green Cove Springs, Florida 32043

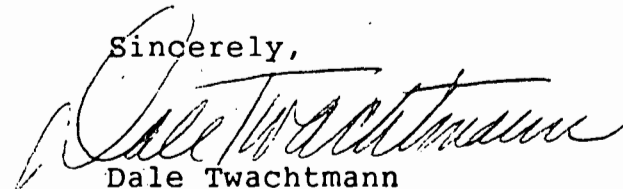
Dear Mr. Luke:

Re: Permitting Exemption for Tanks

The Department reviewed the information submitted on October 9, 1989, by Gate Roofing Mfg., Inc., regarding the installation of a mineral spirits tank, a fuel oil tank, and four cutback asphalt tanks at your facility in Green Cove Springs, Florida. Based upon that information, the Department has determined, pursuant to Rule 17-4.040(1)(b), Florida Administrative Code, that the proposed tanks are exempt from emission limiting standards and will not emit any regulated air pollutants in sufficient quantity as to contribute significantly to the air pollution problems within the State. Therefore, no permit action for the proposed tanks is necessary at this time.

This exemption does not relieve Gate Roofing Mfg., Inc., from obtaining any permits that may be required by other state, federal or local laws.

Sincerely,



Dale Twachtmann
Secretary

DT/plm

cc: A. Kutyna, NE District
L. Stebbins, P.E.
W. Martensen, GRMI



MISSIMER & ASSOCIATES, INC.

Environmental and Groundwater Consultants

8130 BAYMEADOWS WAY WEST
SUITE 104

JACKSONVILLE, FLORIDA 32256

PHONE (904) 448-6400

FAX (904) 448-8556

October 6, 1989
JE9003

Clair H. Fancy, P.E., Deputy Chief
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Subject: Request for Air Permit Exemption
Construction of an Asphalt Roofing Cement Facility
GATE Roofing Mfg., Inc.
Green Cove Springs, Florida

Dear Mr. Fancy:

GATE Roofing Mfg., Inc. desires to build a small facility for the production of asphalt roofing cement. It will be located at the same site where the firm currently manufactures asphalt roofing paper.

Essentially, purchased asphalt will be stored in a 15,000 gallon aboveground outdoor storage tank. The asphalt will be mixed in-line with either mineral spirits or No. 2 Fuel Oil to produce an intermediate product commonly known as cutback asphalt. There will be a single storage tank for each of the diluents and four storage tanks for the cutback asphalt. All the storage tanks will be constructed outdoors, in a diked area and vented to the atmosphere except the asphalt tank which will be outside the diked area. The storage tanks range in size from 10,000 gallons to 15,000 gallons.

The cutback asphalt will be pumped indoors to any of three small closed mixing tanks where the base material will be mixed with cellulose fiber, clay, limestone, and an amine salt. The dry materials and the amine salt will be hand loaded into the mixing tanks, each of which will be equipped with a Torit dust collector.

A review of the regulations indicates that this small facility should be exempt from air permitting requirements. The logic supporting the Request for Exemption is provided in Attachment 1. Accordingly, we respectfully request an exemption from permitting in accordance with the rules established in FAC 17-4.040(b).

Clair H. Fancy, P.E.
Page 2
October 6, 1989

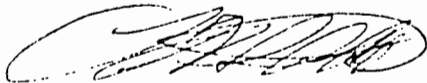
Since there remains a possibility that the Department may disagree with our determination, we have included in this Request for Exemption all the elements of an air permit application package. This dual submission has been prepared in good faith and to avoid any delay in construction of the facility.

We have also included a check for \$200.00 payable to the Florida Department of Environmental Regulation for the construction permit application fee in order to avoid hindering the Department's review of the permit application package. In the event that the exemption is granted we look forward to the return of the check.

The package has been prepared to facilitate your review. Your prompt attention and expeditious determination will be greatly appreciated. Meanwhile, if you have any questions, I can be easily reached at 904/448-6400.

Very truly yours,

MISSIMER AND ASSOCIATES, INC.



Lloyd H. Stebbins
Vice President

LHS/cdb

Enclosures

ATTACHMENT 1

FACTORS SUPPORTING REQUEST FOR AIR PERMIT EXEMPTION
ASPHALT ROOFING CEMENT FACILITY

GATE ROOFING MANUFACTURING, INC.
GREEN COVE SPRINGS, FLORIDA

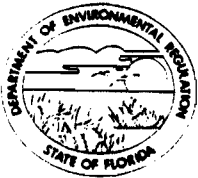
The Request for Exemption from air permitting requirements is readily supported by a review of the regulations which has revealed:

- Since the site is not in a non-attainment area nor is it a major stationary source or a major modification a Pre-construction Review does not apply, FAC 17-2.510(2)(d)2 or 4 [40CFR51.165(a)(2)].
- Although the proposed facility will be located in an attainment area for all criteria pollutants it is neither a major stationary source nor a major modification of a major stationary source. Consequently, PSD does not apply, FAC 17-2.500(2)(d)1, 2, 3, and 4 [40CFR52.21(b)(1)(i) and 40CFR52.21(b)(2)(i)].
- New Source Performance Standards do not apply.
 - 40CFR60 Subpart I -- Standards of Performance for Hot Mixed Asphalt Facilities does not apply because the facility will not be used to manufacture hot mixed asphalt. The asphalt used by the proposed facility will be a purchased raw material.
 - 40CFR60 Subpart Kb -- Standards of Performance for a Volatile Organic Storage Vessels ... does not apply because most of the storage tanks have a capacity less than 40 m³. There are several 15,000 gallon storage tanks (less than 75 m³) which may be subject to 40CFR60.110b(b) to the extent that minor recordkeeping requirements of §50.116b(a) and (b) may apply. However, they are exempted from the General Provisions (40CFR Part 60, Subpart A), and from the balance of Subpart Kb. Consequently, a permit is not required.

- 40CFR60 Subpart UU -- Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture does not apply because the proposed facility is neither an asphalt roofing plant nor an asphalt processing plant. It is not an asphalt roofing plant because it does not produce shingles, rolled roofing, siding or saturated felt. It is not an asphalt processing plant because there are no facilities to blow asphalt for use in producing asphalt products.

- NESHAPS [40CFR61 and FAC 17-2.670] does not apply because there will be no emissions of volatile hazardous air pollutants from the proposed facility nor are there any promulgated standards which apply.
- Reasonably Available Control Technology (RACT) FAC 17-2.650 does not apply because the proposed facility is neither an existing source nor will it be constructed in a non-attainment area. Further, FAC 17-2.650(1)²a provides a clear and specific exception from permitting requirements for facilities which produce cutback asphalt.
- The FDER regulations for control of emissions of cutback asphalt, FAC 17-250(1)(f)13 do not apply because the RACT rule does not apply.
- The emissions from the storage tank vents are extremely small.
- Any leakage from the closed mixing tanks in the building is an OSHA concern and not an FDER issue.

Based on the above conclusions which resulted from a detailed review of the regulations, it is not reasonable to commit either public or private resources to develop and maintain an air permit for these facilities.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Dale Twachtmann

FROM: Steve Smallwood *Steve Smallwood*

DATE: November 30, 1989

SUBJ: Approval of Exemption for Gate Roofing Mfg., Inc.

Attached for your approval and signature is an exemption for the construction of six storage tanks in Clay County pursuant to Florida Administrative Code Rule 17-4.04(1)(b). Bureau of Air Regulation staff determined that the construction of these tanks is exempt from the permitting requirements of FAC Rule 17-2.210.

I recommend your approval and signature.

Attachments

SS/JR/plm

RECEIVED
OEC '1 1989

Office of the Secretary

P 938 762 773

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

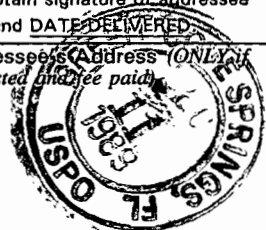
(See Reverse)

PS Form 3800, June 1985

Sent to Mr. Joseph C. Luke, Gate Roofing	
Special No. P.O. Box 716	
P.O. State and ZIP Code Green Cove Springs, FL 32043	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 12-8-89 Permit: AC 10-171321	

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Joseph C. Luke, President Gate Roofing Mgf., Inc. P. O. Box 716 Green Cove Springs, FL 32043	4. Article Number P 938 762 773
	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
	Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>
5. Signature - Address X <i>Joseph C. Luke</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 29, 1989

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Mr. Joseph C. Luke, President
Gate Roofing Mfg., Inc.
Post Office Box 716
Green Cove Springs, FL 32043

Dear Mr Luke:

Attached is one copy of the Technical Evaluation and Preliminary Determination and proposed permit for Gate Roofing Mfg., Inc. to construct an asphalt storage tank at your facility in Green Cove Springs, Clay County, Florida.

Please submit any written comments you wish to have considered concerning the Department's proposed action to Mr. Bill Thomas of the Bureau of Air Regulation.

Sincerely,

C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

CHF/JR/plm

Attachments

cc: A. Kutyna, NE Dist.
L. Stebbins, P.E.
W. Martensen, GRMI

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

In the Matter of
Application for Permit by:

Gate Roofing Mfg., Inc.
P. O. Box 716
Green Cove Springs, FL 32043

DER File No. AC 10-171231

INTENT TO ISSUE

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above. The Department is issuing this Intent to Issue for the reasons stated in the attached Technical Evaluation and Preliminary Determination.

The applicant, Gate Roofing Mfg., Inc. , applied on October 9, 1989, to the Department of Environmental Regulation for a permit to construct an asphalt storage tank at their facility in Green Cove Springs, Clay County, Florida.

The Department has permitting jurisdiction under Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-2 and 17-4. The project is not exempt from permitting procedures. The Department has determined that an air construction permit is required for the proposed work.

Pursuant to Section 403.815, F.S. and DER Rule 17-103.150, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time only within 30 days, in the legal ad section of a newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. The applicant shall provide proof of publication to the Department, at the address specified within seven days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a petition for an administrative proceeding (hearing) is filed pursuant to the provisions of Section 120.57, F.S.

A person whose substantial interests are affected by the Department's proposed permitting decision 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400. Petitions filed by the permit applicant and the parties listed below must be filed within 14 days of receipt of this intent. Petitions filed by other persons must be filed within 14 days of publication of the public notice or within 14 days of receipt of this intent, whichever first occurs. 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

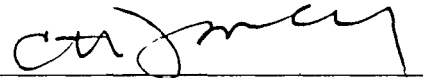
(g) A statement of the relief sought by petitioner, stating precisely the action petitioner wants the Department to take with respect to the Department's action or proposed action.

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 notice. Persons whose substantial interests will be affected by any decision of the Department with regard to the application(s) 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 publication of this notice in the Office in 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.

Executed in Tallahassee, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION



C. H. Fancy, P.E.
Chief
Bureau of Air Regulation

Copies furnished to:

A. Kutyna, NE Dist.
L. Stebbins, P.E.
W. Martensen, GRMI

CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this NOTICE OF INTENT TO ISSUE and all copies were mailed before the close of business on 12-8-89.

FILING AND ACKNOWLEDGEMENT
FILED, on this date, pursuant to
§120.52(9), Florida Statutes, with
the designated Department Clerk,
receipt of which is hereby
acknowledged.

Herb Baker
Clerk

12-8-89
Date

State of Florida
Department of Environmental Regulation
Notice of Intent to Issue

The Department of Environmental Regulation hereby gives notice of its intent to issue a permit to Gate Roofing Mfg., Inc. to construct/install an asphalt storage tank at their facility in Green Cove Springs, Clay County, Florida. A determination of Best Available Control Technology (BACT) was not required. The Department is issuing this Intent to Issue for the reasons stated in the Technical Evaluation and Preliminary Determination.

A person whose substantial interests are affected by the Department's proposed permitting decision 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 2600 Blair Stone Road, Tallahassee, Florida 32399-2400, within fourteen (14) days of publication of this notice. 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
- (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 Notice. 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 publication 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.

The application is available for public inspection during business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Regulation
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Department of Environmental Regulation
Northeast District
3426 Bills Road
Jacksonville, Florida 32207

Any person may send written comments on the proposed action to Mr. Bill Thomas at the Department's Tallahassee address. All comments mailed within 14 days of the publication of this notice will be considered in the Department's final determination.

Technical Evaluation
and
Preliminary Determination

Gate Roofing Mfg., Inc.
Clay County
Green Cove Springs, Florida

Asphalt Storage Tank
Permit No. AC 10-171231

Department of Environmental Regulation
Division of Air Resources Management
Bureau of Air Regulation

November 29, 1989

I. Application

A. Applicant

Gate Roofing Mfg., Inc.
P. O. Box 716
Green Cove Springs, Florida 32043

B. Request

The Department received a complete application on October 9, 1989, for a permit to construct an asphalt storage tank at the applicant's facility in Green Cove Springs.

C. Location/Classification

The applicant's asphalt roofing facility (SIC Code 2952) is located on Hall Park Drive in Green Cove Springs with latitude and longitude of 29° 58' 55" N and 81° 40' 17" W, respectively. The UTM coordinates of the site are: Zone 17, 435.2 km E and 3,316.8 km N.

II. Project Description/Emissions

It is proposed to install a 15,000 gallon asphalt storage tank, a 10,000 gallon mineral spirits tank, a 10,000 gallon fuel oil tank, and four 15,000 gallon cutback asphalt tanks in conjunction with a new asphalt roofing cement facility. This facility will purchase 2.4 million gallons per year of asphalt to be mixed in-line with mineral spirits or No. 2 fuel oil for production of an intermediate product known as cutback asphalt. The cutback asphalt will be pumped to one of three enclosed indoor tanks for mixing with cellulose fiber, clay, limestone and an amine salt to make asphalt roofing cement. The system is designed for loading of dry materials by hand into the mixing tanks. Each mixing tank will be equipped with a self-contained dust collector vented inside the building.

III. Rule Applicability

The construction permit application is subject to review under Chapter 403, Florida Statutes, and Florida Administrative Code (F.A.C.) Chapters 17-2 and 17-4. The facility is located in an area classified as attainment for all of the regulated air pollutants. Since it is a new facility, the federal new source performance standards adopted by reference in F.A.C. Rule 17-2.660 shall apply. The requirements of 40 CFR 60, Subpart UU, Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture, apply to any new asphalt storage tank that processes and/or stores asphalt used for roofing only or for roofing and other purposes and is located at an asphalt roofing plant. Storage tanks containing cutback asphalts are

specifically exempted from this regulation. The mineral spirits tank and the No. 2 fuel oil tank are exempt from the requirements of 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels), since each has a capacity below 40 cubic meters (10,568 gallons). Therefore, only the asphalt storage tank is subject to the federal new source performance standards.

IV. Conclusion

Based on the information provided by Gate Roofing Mfg., Inc., the Department has reasonable assurance that the proposed construction/installation of the asphalt storage tank, as described in this evaluation, and subject to the conditions proposed herein, will not cause or contribute to a violation of any air quality standard, PSD increment, or any other technical provision of Chapter 17-2 of the Florida Administrative Code.





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

PERMITTEE:

Gate Roofing Mfg., Inc.

Post Office Box 716

Green Cove Springs, FL 32043

Permit Number: AC 10-171231

Expiration Date: December 31, 1990

County: Clay

Latitude/Longitude: 29°58'55"N

81°40'17"W

Project: Asphalt Storage Tank

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 17-2 and 17-4. 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:

For the installation of an asphalt storage tank. This project will be located at the applicant's facility in Green Cove Springs, Clay County, Florida. The UTM coordinates of this site are Zone 17, 435.2 km E and 3,316.8 km N.

The source shall be constructed in accordance with the permit application, plans, documents, amendments and drawings, except as otherwise noted in the General and Specific Conditions.

Attachments are listed below:

1. Application to Operate/Construct Air Pollution Sources, DER Form 17-202(1), received on October 9, 1989.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

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 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. 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), Florida Statutes, 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 the permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement 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.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or 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 or 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 a reasonable time, 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 the conditions of the 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 non-compliance; and
- b. the period of noncompliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

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.

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 proscribed by Sections 403.73 and 403.111, Florida Statutes. 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 Florida Administrative Code Rules 17-4.120 and 17-30.300, 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:

Compliance with New Source Performance Standards (NSPS)

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.

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

GENERAL CONDITIONS:

- 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 instrumentation) 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:
- the date, exact place, and time of sampling or measurements;
 - the person responsible for performing the sampling or measurements;
 - the dates analyses were performed;
 - the person responsible for performing the analyses;
 - the analytical techniques or methods used; and
 - 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 that 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.

SPECIFIC CONDITIONS:

1. The construction and operation of this source shall be in accordance with the capacities and specifications stated in the application.
2. The asphalt storage tank shall have a maximum capacity of 15,000 gallons and shall be allowed to operate for up to 8,760 hours per year.
3. Visible emissions from the asphalt storage tank shall not be greater than 0% opacity except for one consecutive 15-minute period in any 24-hour period when the transfer lines are blown for

PERMITTEE:
Gate Roofing Mfg., Inc.

Permit Number: AC 10-171231
Expiration Date: December 31, 1990

SPECIFIC CONDITIONS:

clearing. Compliance shall be demonstrated at 90-100% of permitted capacity using DER Method 9 in accordance with F.A.C. Rule 17-2.700.

4. No asbestos or other hazardous materials shall be used in the production of the purchased asphalt or in the production of asphalt cement.

5. The compliance test shall be conducted within 30 days after operation begins and the results reported to the Department's Northeast District office before this construction permit expires. The district office shall be notified at least 15 days in advance of the test and at least 5 days prior to the tank being placed in operation.

6. The permittee, for good cause, may request that this construction permit be extended. Such a request shall be submitted to the Bureau of Air Regulation prior to 60 days before the expiration of the permit (F.A.C. Rule 17-4.090).

7. An application for an operation permit must be submitted to the Northeast District office at least 90 days prior to the expiration date of this construction permit or within 45 days after completion of compliance testing, whichever occurs first. To properly apply for an operation permit, the applicant shall submit the appropriate application form, fee, certification that construction was completed noting any deviations from the conditions in the construction permit, and compliance test reports as required by this permit (F.A.C. Rule 17-4.220).

Issued this _____ day
of _____, 1989

**STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION**

Dale Twachtmann, Secretary



MISSIMER & ASSOCIATES, INC.

Environmental and Groundwater Consultants

Suite 104
8130 Baymeadows Way West
Jacksonville, Florida 32256

(904) 448-6400
Fax (904) 448-8556

RECEIVED

OCT 24 1989

DER-BAQM

October 23, 1989
JE9003

Clair H. Fancy, P.E., Deputy Chief
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Subject: Request for Air Permit Exemption
Construction of an Asphalt Roofing Cement Facility
GATE Roofing Mfg., Inc.
Green Cove Springs, Florida

Re: Telcon from Lloyd H. Stebbins, M&A, to
J. Reynolds, FDER-CAPS, on October 20, 1989

Dear Mr. Fancy:

During my conversation with John Reynolds, it became clear that the recently submitted request for an air permit exemption qualified for the exemption in all respects except for possibly the small asphalt storage tank in front of the process. Recall that the dual application package addresses the construction of a small asphalt roofing cement facility. John explained that the asphalt tank must be regulated as a potential source of emissions according to the terms of 40 CFR Subpart UU--"Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture." Despite the fact that this facility does not qualify as an asphalt roofing plant or an asphalt processing plant it is physically located on the same site as another process which produces asphalt rolled roofing. Consequently, there may be applicable language in §60.470-Applicability and designation of affected facilities, subparagraph (a) which says in part "any asphalt storage tank ... that ... stores only non-roofing asphalt ... is subject to the requirements of this subpart."



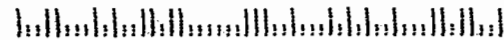
MISSIMER & ASSOCIATES, INC.

Environmental and Groundwater Consultants

Suite 104
8130 Baymeadows Way West
Jacksonville, Florida 32256



CLAIR H. FANCY, P.E., DEPUTY CHIEF
FL DEPT. OF ENVIRONMENTAL REGULATION
TWIN TOWERS OFFICE BLDG.
2600 BLAIR STONE ROAD
TALLAHASSEE, FL 32301-8241




Clair H. Fancy, P.E.
Page 2
October 23, 1989

Subsequent conversations with our client has revealed that this facility can be constructed without the asphalt roofing tank. Essentially, asphalt will be delivered by truck and pumped directly to the process where it will be mixed with No. 2 fuel oil and/or mineral spirits to form cutback asphalt which becomes the raw material for the roofing cement. Therefore, we respectfully request that you continue the review process thus granting the exemption for everything except the asphalt storage tank and review the construction permit application only with respect to the asphalt storage tank. We suggest that the preliminary technical determination simply acknowledge the exemption for the other items in the package.

If we can provide any additional information or answer any further questions, please give me a call at 904/448-6400.

Very truly yours,

MISSIMER AND ASSOCIATES, INC.



Lloyd H. Stebbins, P.E.
Vice President-Regional Manager

LHS/cdb

cc: Woody Martensen, GATE Roofing
Morton Benjamin, FDER-Northeast District

copied: J. Reynolds
LHF/BT

APPLICATION TO CONSTRUCT

AIR POLLUTION SOURCE

ASPHALT ROOFING CEMENT FACILITY

**GATE ROOFING MFG., INC.
GREEN COVE SPRINGS, FLORIDA**

Prepared by:

**MISSIMER AND ASSOCIATES, INC.
Environmental and Groundwater Consultants**

Jacksonville, Florida

October 6, 1989



GATE
ROOFING MFG., INC.



HALL INDUSTRIAL PARK P.O. BOX 716 GREEN COVE SPRINGS, FL 32043 (904) 284-7571 FAX (904) 284-0526

October 6, 1989

Clair H. Fancy, P.E., Deputy Chief
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Subject: Air Permit Exemption/Application
GATE Roofing Mfg., Inc.
Green Cove Springs, Florida

Dear Mr. Fancy:

We are planning to build a small facility to produce asphalt roofing cement on our existing site in Green Cove Springs which manufactures asphalt roofing paper.

Since this is a very small facility, a detailed review of the regulations was conducted to determine whether a permit was required. This review indicates that the facility should be exempt from air permitting requirements. However, in the event that the Department's determination differs from ours, we have included an air permit application package to avoid hindering the regulatory process in any way.

We would like to construct this source as quickly as possible for market reasons. Therefore, we would sincerely appreciate your assistance in expediting the review process. If you have questions, please contact me or our consultant, Lloyd H. Stebbins, Missimer and Associates, Inc., at 904/448-6400.

Very truly yours,

W. W. Martensen

W. W. Martensen
Vice President and General Manager
Gate Cements and Coatings Division

WWM/cdb
Enclosures

SWING TO GATE

THIS CHECK IS VOID IF COLORED BACKGROUND IS ABSENT

First Union National Bank of Florida

63-7
63



9540 SAN JOSE BOULEVARD
P.O. BOX 23627
JACKSONVILLE, FLORIDA 32241-3627
(904) 737-7220

002-002-01

CHECK NO. 020491

020491

DATE: 10/04/89

PAY TO THE ORDER OF TWO HUNDRED DOLLARS AND NO/100*****

AMOUNT \$**200.00**

FLORIDA DEPT. OF ENVIRONMENTAL REGULATIONS

TO THE ORDER OF

W. W. Martensen
Louis M. Zemanek

THIS CHECK IS VOID IF NOT CASHED WITHIN 60 DAYS



Tallahassee, Florida 32301-8241

Subject: Air Permit Exemption/Application
GATE Roofing Mfg., Inc.
Green Cove Springs, Florida

Dear Mr. Fancy:

We are planning to build a small facility to produce asphalt roofing cement on our existing site in Green Cove Springs which manufactures asphalt roofing paper.

Since this is a very small facility, a detailed review of the regulations was conducted to determine whether a permit was required. This review indicates that the facility should be exempt from air permitting requirements. However, in the event that the Department's determination differs from ours, we have included an air permit application package to avoid hindering the regulatory process in any way.

We would like to construct this source as quickly as possible for market reasons. Therefore, we would sincerely appreciate your assistance in expediting the review process. If you have questions, please contact me or our consultant, Lloyd H. Stebbins, Missimer and Associates, Inc., at 904/448-6400.

Very truly yours,

W. W. Martensen
W. W. Martensen
Vice President and General Manager
Gate Cements and Coatings Division

WWM/cdb
Enclosures

1531

ASPHALT ROOFING CEMENT FACILITY

GATE ROOFING MFG., INC.
GREEN COVE SPRINGS, FLORIDA

TABLE OF CONTENTS

OWNER'S LETTER

PROFESSIONAL ENGINEER'S LETTER

APPLICATION TO CONSTRUCT AIR POLLUTION SOURCE

ATTACHMENT 1: Section II.A - Process Description

ATTACHMENT 2: Section III.A - Raw Materials and Chemicals Used

ATTACHMENT 3: Section III.B - Process Rate

ATTACHMENT 4: Section III.C - Calculation of Airborne
Contaminants Emitted

ATTACHMENT 5: Section III.E - Calculation of Fuel Consumption
and Heat Input Rate

ATTACHMENT 6: Emission Stack Geometry and Flow Characteristics

ATTACHMENT 7: Process Flow Diagram

ATTACHMENT 8: Location Map

ATTACHMENT 9: Tank Farm Layout



MISSIMER & ASSOCIATES, INC.

Environmental and Groundwater Consultants

8130 BAYMEADOWS WAY WEST
SUITE 104
JACKSONVILLE, FLORIDA 32256
PHONE (904) 448-6400
FAX (904) 448-8556

October 6, 1989
JE9003

Clair H. Fancy, P.E., Deputy Chief
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301-8241

Subject: **Request for Air Permit Exemption
Construction of an Asphalt Roofing Cement Facility
GATE Roofing Mfg., Inc.
Green Cove Springs, Florida**

Dear Mr. Fancy:

GATE Roofing Mfg., Inc. desires to build a small facility for the production of asphalt roofing cement. It will be located at the same site where the firm currently manufactures asphalt roofing paper.

Essentially, purchased asphalt will be stored in a 15,000 gallon aboveground outdoor storage tank. The asphalt will be mixed in-line with either mineral spirits or No. 2 Fuel Oil to produce an intermediate product commonly known as cutback asphalt. There will be a single storage tank for each of the diluents and four storage tanks for the cutback asphalt. All the storage tanks will be constructed outdoors, in a diked area and vented to the atmosphere except the asphalt tank which will be outside the diked area. The storage tanks range in size from 10,000 gallons to 15,000 gallons.

The cutback asphalt will be pumped indoors to any of three small closed mixing tanks where the base material will be mixed with cellulose fiber, clay, limestone, and an amine salt. The dry materials and the amine salt will be hand loaded into the mixing tanks, each of which will be equipped with a Torit dust collector.

A review of the regulations indicates that this small facility should be exempt from air permitting requirements. The logic supporting the Request for Exemption is provided in Attachment 1. Accordingly, we respectfully request an exemption from permitting in accordance with the rules established in FAC 17-4.040(b).

Clair H. Fancy, P.E.
Page 2
October 6, 1989

Since there remains a possibility that the Department may disagree with our determination, we have included in this Request for Exemption all the elements of an air permit application package. This dual submission has been prepared in good faith and to avoid any delay in construction of the facility.

We have also included a check for \$200.00 payable to the Florida Department of Environmental Regulation for the construction permit application fee in order to avoid hindering the Department's review of the permit application package. In the event that the exemption is granted we look forward to the return of the check.

The package has been prepared to facilitate your review. Your prompt attention and expeditious determination will be greatly appreciated. Meanwhile, if you have any questions, I can be easily reached at 904/448-6400.

Very truly yours,

MISSIMER AND ASSOCIATES, INC.



Lloyd H. Stebbins
Vice President

LHS/cdb

Enclosures

ATTACHMENT 1

FACTORS SUPPORTING REQUEST FOR AIR PERMIT EXEMPTION
ASPHALT ROOFING CEMENT FACILITY

GATE ROOFING MANUFACTURING, INC.
GREEN COVE SPRINGS, FLORIDA

The Request for Exemption from air permitting requirements is readily supported by a review of the regulations which has revealed:

- Since the site is not in a non-attainment area nor is it a major stationary source or a major modification a Pre-construction Review does not apply, FAC 17-2.510(2)(d)2 or 4 [40CFR51.165(a)(2)].
- Although the proposed facility will be located in an attainment area for all criteria pollutants it is neither a major stationary source nor a major modification of a major stationary source. Consequently, PSD does not apply, FAC 17-2.500(2)(d)1, 2, 3, and 4 [40CFR52.21(b)(1)(i) and 40CFR52.21(b)(2)(i)].
- New Source Performance Standards do not apply.
 - 40CFR60 Subpart I -- Standards of Performance for Hot Mixed Asphalt Facilities does not apply because the facility will not be used to manufacture hot mixed asphalt. The asphalt used by the proposed facility will be a purchased raw material.
 - 40CFR60 Subpart Kb -- Standards of Performance for a Volatile Organic Storage Vessels ... does not apply because most of the storage tanks have a capacity less than 40 m³. There are several 15,000 gallon storage tanks (less than 75 m³) which may be subject to 40CFR60.110b(b) to the extent that minor recordkeeping requirements of §50.116b(a) and (b) may apply. However, they are exempted from the General Provisions (40CFR Part 60, Subpart A), and from the balance of Subpart Kb. Consequently, a permit is not required.

- 40CFR60 Subpart UU -- Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture does not apply because the proposed facility is neither an asphalt roofing plant nor an asphalt processing plant. It is not an asphalt roofing plant because it does not produce shingles, rolled roofing, siding or saturated felt. It is not an asphalt processing plant because there are no facilities to blow asphalt for use in producing asphalt products.
- NESHAPS [40CFR61 and FAC 17-2.670] does not apply because there will be no emissions of volatile hazardous air pollutants from the proposed facility nor are there any promulgated standards which apply.
- Reasonably Available Control Technology (RACT) FAC 17-2.650 does not apply because the proposed facility is neither an existing source nor will it be constructed in a non-attainment area. Further, FAC 17-2.650(1)a provides a clear and specific exception from permitting requirements for facilities which produce cutback asphalt.
- The FDER regulations for control of emissions of cutback asphalt, FAC 17-250(1)(f)13 do not apply because the RACT rule does not apply.
- The emissions from the storage tank vents are extremely small.
- Any leakage from the closed mixing tanks in the building is an OSHA concern and not an FDER issue.

Based on the above conclusions which resulted from a detailed review of the regulations, it is not reasonable to commit either public or private resources to develop and maintain an air permit for these facilities.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION



BOB GRAHAM
GOVERNOR

VICTORIA H. TSCHINKEL
SECRETARY

RICHARD D. GARRITY, PH.D.
DISTRICT MANAGER

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH
TAMPA, FLORIDA 33610-9544

APPLICATION TO ~~RENEW~~/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Asphalt Roofing Cement [] New¹ [] Existing
APPLICATION TYPE: [] Construction [] Operation [] Modification
COMPANY NAME: Gate Roofing Mfg., Inc. COUNTY: Clay

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Asphalt Roofing Cement

SOURCE LOCATION: Street Hall Park Drive City Green Cove Spgs.

UTM: East 435238 North 3316762
Latitude 29 ° 58 ' 55 "N Longitude 81 ° 40 ' 17 "W

APPLICANT NAME AND TITLE: Joseph C. Luke, President

APPLICANT ADDRESS: Post Office Box 716, Green Cove Springs, FL 32043

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Gate Roofing Mfg., Inc

I certify that the statements made in this application for a construction permit are true, correct and complete to the best of my knowledge and belief. Further I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permit establishment.

*Attach letter of authorization

Signed: Joseph C. Luke
Joseph C. Luke, President
Name and Title (Please Type)

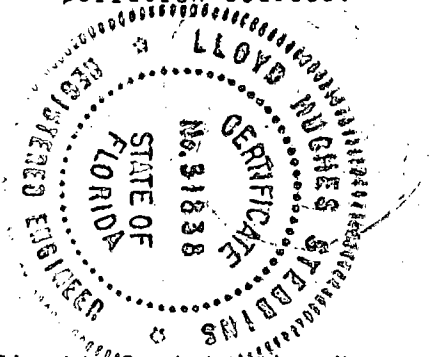
Date: 10/6/89 Telephone No. 904/737-7220

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

¹ See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed *[Signature]*

Lloyd H. Stebbins, P.E.
Name (Please Type)

Missimer and Associates, Inc.
Company Name (Please Type)
8130 Baymeadows Way, W., Suite 104
Jacksonville, FL 32256
Mailing Address (Please Type)

Florida Registration No. 31838 Date: 10/6/89 Telephone No. 904/448-6400

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Refer to Attachment 1, "PROCESS DESCRIPTION" and Attachment 7,
"FLOW DIAGRAM."

B. Schedule of project covered in this application (Construction Permit Application Only)
Start of Construction 10/89 Completion of Construction 10/90

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)
Does Not Apply.

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.
None.

E. Requested permitted equipment operating time: hrs/day 24; days/wk 7; wks/yr 52;
if power plant, hrs/yr NA; if seasonal, describe: Does not apply

F. If this is a new source or major modification, answer the following questions.
(Yes or No)

1. Is this source in a non-attainment area for a particular pollutant? NO
a. If yes, has "offset" been applied? NA
b. If yes, has "Lowest Achievable Emission Rate" been applied? NA
c. If yes, list non-attainment pollutants. NA

2. Does best available control technology (BACT) apply to this source?
If yes, see Section VI. NO

3. Does the State "Prevention of Significant Deterioration" (PSD)
requirement apply to this source? If yes, see Sections VI and VII. NO

4. Do "Standards of Performance for New Stationary Sources" (NSPS)
apply to this source? NO*

5. Do "National Emission Standards for Hazardous Air Pollutants"
(NESHAP) apply to this source? NO

H. Do "Reasonably Available Control Technology" (RACT) requirements apply
to this source? NO

a. If yes, for what pollutants? NA

b. If yes, in addition to the information required in this form,
any information requested in Rule 17-2.650 must be submitted. NA

Attach all supportive information related to any answer of "Yes". Attach any justifi-
cation for any answer of "No" that might be considered questionable.

*The only exception may be a minor recordkeeping requirement in
40CFR60, Subpart Kb-Standards of Performance for Volatile Organic
Liquid Storage Vessels. Refer to Attachment 4 for details.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable:

Refer to Attachment 2

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		
Mineral Spirits	VOC	100	451	Tab 7
No. 2 Fuel Oil	VOC	100	457	Tab 7
Asphalt	NA	NA	2232	Tab 7

Refer to Attachment 3

B. Process Rate, if applicable: (See Section V, Item 1)

- Total Process Input Rate (lbs/hr): 3140
- Product Weight (lbs/hr): 4836

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Refer to Attachment 4

Name of Contaminant	Emission ¹		Allowed ² Emission Rate per Rule 17-2	Allowable ³ Emission lbs/hr	Potential ⁴ Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
Mineral Spts	0.039	0.171	17-2.660(2)(a)*	NA	341.64	0.171	Tab 7
No. 2 F.O.	0.020	0.086	17-2.660(2)(a)*	NA	171.09	0.086	Tab 7
Asphalt	NA		NA	NA	NA	NA	Tab 7
Cutback**	0.055	0.239	17-2.660(2)(a)*	NA	477.55	0.239	Tab 7

¹See Section V, item 2. **Typical of four identical tanks

²Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

³Calculated from operating rate and applicable standard.

⁴Emission, if source operated without control (See Section V, Item 3).
 *Chapter 17-2.660 FAC adopts 40CFR60 by reference, including Subpart Kb-- Standards of Performance for Volatile Organic Liquid Storage Vessels. The federal rules do not apply any specific allowable emission rate. Since certain exceptions apply, the tanks are only subject to a minor recordkeeping requirement.

J. Control Devices: (See Section V, Item 4)

Does Not Apply

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels Refer to Attachment 5

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	
No. 2 Fuel Oil	3.0	3.0	0.4188

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: 0.34 Percent Ash: NA
Density: 7.17 lbs/gal Typical Percent Nitrogen: NA
Heat Capacity: 0.493 BTU/lb 0.1396 MM BTU/gal
Other Fuel Contaminants (which may cause air pollution): None

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average None Maximum NA

G. Indicate liquid or solid wastes generated and method of disposal.

None. All "wastes" are fed back into the system and reused. Nothing is
disposed.

Refer to Attachment 6

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack):

Stack Height: _____ ft. Stack Diameter: _____ ft.
 Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.
 Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION Does Not Apply

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq. & Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume (ft) ³	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diameter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: Cyclone Wet Scrubber Afterburner
 Other (specify) _____

Brief description of operating characteristics of control devices: _____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)]
 - . To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.
3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).
4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)
5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).
6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.
7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).
8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.
10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY

Does Not Apply

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

Yes No

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____

B. Has EPA declared the best available control technology for this class of sources (if yes, attach copy)

Yes No

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration
_____	_____
_____	_____
_____	_____

D. Describe the existing control and treatment technology (if any).

- | | |
|---------------------------|--------------------------|
| 1. Control Device/System: | 2. Operating Principles: |
| 3. Efficiency:* | 4. Capital Costs: |

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

- a. Height: ft. b. Diameter: ft.
- c. Flow Rate: ACFM d. Temperature: °F.
- e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy ² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:
- j. Applicability to manufacturing processes:
- k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

- a. Control Device: b. Operating Principles:
- c. Efficiency:¹ d. Capital Cost:
- e. Useful Life: f. Operating Cost:
- g. Energy:² h. Maintenance Cost:
- i. Availability of construction materials and process chemicals:

¹Explain method of determining efficiency.

²Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:¹

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:²

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:¹

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:²

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

¹ Explain method of determining efficiency.

Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

b. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:¹

Contaminant

Rate or Concentration

(8) Process Rate:¹

10. Reason for selection and description of systems:

¹Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION Does Not Apply

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ () SO₂* _____ Wind spd/dir

Period of Monitoring _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? Yes No

b. Was instrumentation calibrated in accordance with Department procedures?
 Yes No Unknown

B. Meteorological Data Used for Air Quality Modeling

1. _____ Year(s) of data from _____ / _____ / _____ to _____ / _____ / _____
month day year month day year

2. Surface data obtained from (location) _____

3. Upper air (mixing height) data obtained from (location) _____

4. Stability wind rose (STAR) data obtained from (location) _____

C. Computer Models Used

- 1. _____ Modified? If yes, attach description.
- 2. _____ Modified? If yes, attach description.
- 3. _____ Modified? If yes, attach description.
- 4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data

Pollutant	Emission Rate
TSP	_____ grams/sec
SO ₂	_____ grams/sec

E. Emission Data Used in Modeling

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review.

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources.

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 1

SECTION II A

PROCESS DESCRIPTION

**GATE ROOFING MFG., INC.
GREEN COVE SPRINGS, FLORIDA**

This facility will produce asphalt roofing cement. Purchased asphalt will be stored in a 15,000 gallon aboveground outdoor storage tank. The asphalt will be mixed in-line with mineral spirits and No. 2 Fuel Oil to produce an intermediate product commonly known as cutback asphalt (Refer to Attachment 6, FLOW DIAGRAM). There will be a single storage tank for each of the diluents and four storage tanks for the cutback asphalt. All the storage tanks will be constructed outdoors, in a diked area and vented to the atmosphere through a vent relief valve except the asphalt tank which will be outside the diked area. The storage tanks range in size from 10,000 gallons to 15,000 gallons.

The cutback asphalt will be pumped indoors to any of three small closed mixing tanks where the base material will be mixed with cellulose fiber, clay, limestone, and an amine salt. The dry materials and the amine salt will be hand-loaded into the mixing tanks, each of which will be equipped with a Torit dust collector. The dust collectors are vented inside the building. Collected dust falls back into the mixers through the open bottoms of the units.

Since the mixing process will be performed inside a closed building, any resulting fugitive emissions will remain indoors and will not reach the outside atmosphere.

ATTACHMENT 2

**SECTION III.A
RAW MATERIALS**

The utilization rate can be determined by dividing the total annual throughput for each raw material by the total annual operating hours and applying the appropriate conversion factors.

For mineral spirits, the utilization rate becomes:

$$\begin{aligned} & (600,000 \text{ gal/yr} \times 8.34 \text{ lb/gal} \times 0.79 \text{ sp. gr}) / 8760 \text{ hr/yr} \\ & = 3,953,160 \text{ lb/yr} / 8760 \text{ hr/yr} \\ & = 451 \text{ lb/hr mineral spirits} \end{aligned}$$

where,

Annual throughput = 600,000 gal/yr
Density of water = 8.34 lb/gal
Specific gravity of mineral spirits = 0.79 and
Annual operating time = 8760 hrs/yr

For No. 2 fuel oil, the utilization rate becomes:

$$\begin{aligned} & (600,000 \text{ gal/yr} \times 8.34 \text{ lb/gal} \times 0.80 \text{ sp. gr}) / 8760 \text{ hrs/yr} \\ & = 4,003,200 \text{ lb/yr} / 8760 \text{ hrs/yr} \\ & = 457 \text{ lb/hr No. 2 fuel oil} \end{aligned}$$

where,

Annual throughput = 600,000 gal/yr
Density of water = 8.34 lb/gal
Specific gravity of No. 2 fuel oil = 0.80 and
Annual operating time = 8760 hr/yr

For asphalt, the utilization rate becomes:

$$\begin{aligned} & (2,392,000 \text{ gal/yr} \times 8.34 \text{ lb/gal} \times 0.98 \text{ sp. gr}) / 8760 \text{ hr/yr} \\ & = 19,550,294 \text{ lb/yr} / 8760 \text{ hr/yr} \\ & = 2232 \text{ lb/hr asphalt} \end{aligned}$$

where,

Annual throughput = 2,392,000 gal/yr

Density of water = 8.34 lb/gal

Specific gravity of asphalt = 0.98 and

Annual operating time = 8760 hr/yr

ATTACHMENT 3

SECTION III.B
PROCESS RATE

The total process rate can be determined by obtaining the utilization rate listed in Attachment 2 (Section III.A) for each raw material and totaling them.

<u>Raw Material</u>	<u>Input Rate (lbs/hr)</u>
Mineral spirits	451
No. 2 fuel oil	457
Asphalt	<u>2232</u>
Total Process Input Rate	3140 lbs/hr

The total product weight is determined by dividing the total product produced, obtained from company records, by the total operating hours after applying the appropriate conversion factors.

$$\begin{aligned} & (4,000,000 \text{ gal/yr} \times 8.34 \text{ lb/gal} \times 1.27 \text{ sp. gr.}) / 8760 \text{ hr/yr} \\ & = 42,367,200 \text{ lb/yr} / 8760 \text{ hr/yr} \\ & = \mathbf{4836 \text{ lb/hr}} \end{aligned}$$

where,

Annual production = 4,000,000 gal/yr

Density of water = 8.34 lb/gal

Specific gravity of roofing cement = 1.29 and

Annual operating time = 8760 hrs/yr

ATTACHMENT 4

SECTION III C

CALCULATION OF AIRBORNE
CONTAMINANTS EMITTED

Tank emissions result from a combination of losses due to displaced vapors from tank filling, i.e. working losses, and tank "breathing" due to changes in ambient temperatures.

The rate of VOC emissions from the mineral spirits, No. 2 fuel oil, asphalt and cutback asphalt tanks, due to breathing losses and working losses, can be calculated as described in USEPA AP-42, "Compilation of Air Pollutant Emission Factors," pages 4.3-5 through 4.3-11, Fourth Edition, 1985.

ACTUAL EMISSIONS

Calculations of Breathing Loss

Use the breathing loss equation in AP-42, page 4.3-5:

$$L_b = 2.26 \times 10^{-2} M_v \left(\frac{P}{P_A - P} \right)^{0.68} D^{1.73} H^{0.51} \Delta T^{0.50} F_p C K_c$$

where:

L_b = Breathing Loss (lb/yr)

M_v = Vapor Molecular Weight (lb/lb mol)

P = True Vapor Pressure at Bulk Storage Conditions (psia)

P_A = Atmospheric Pressure, psia

= 14.7 psia

D = Tank Diameter (ft.)

H = Average Vapor Space Height (ft.)

According to AP-42, for purposes of calculating breathing losses, assume that H equals one-half tank height.

ΔT = Average Ambient Diurnal Temperature Change (°F)

Information from National Oceanic and Atmospheric Administration (NOAA) received by telephone on 6-20-88 indicates that the Jacksonville average high temperature is 78.7°F and the average low is 57.2°F. The average diurnal change, "Delta T," is therefore $78.7 - 57.2 = 21.5^\circ\text{F}$.

F_p = Paint Factor, from AP-42, Table 4.3-1--Assume that the tanks at Gate Roofing are similar to medium gray in the Table. Select $F_p = 1.40$

C = Small Diameter Tank Adjustment Factor, AP-42, Figure 4.3-4
= 0.55

K_c = product factor, AP-42, Page 4.3-11 = 1.0

The parameters for the breathing loss equation are listed in Table 3-1 followed by the calculated values listed in Table 3-2.

Calculation of Working Loss

Use the working loss equation in AP-42, page 4.3-8

$$L_w = (2.4 \times 10^{-5}) M_v P V N K_N K_C$$

where:

L_w = Working Loss (lb/yr)

M_v = Vapor Molecular Weight (lb/lb mol)

P = True Vapor Pressure at bulk storage conditions (psia)

V = Tank Volume (gallons)

N = Number of Annual Turnovers of Tank Volume

K_N = Turnover factor from AP-42, Figure 4.3-7

K_C = Product factor from AP-42, Page 4.3-11

Accordingly, the calculation of working loss is indicated in Table 3-3, "Calculations of Working Loss."

TABLE 3-1

CALCULATION OF BREATHING LOSS

TANK	FACTOR	MOLECULAR WT OF VAPOR M_v (LB/ LB MOL)	TRUE VAPOR PRESSURE P (PSIA)	AVERAGE ATMOS. PRESSURE P_A (PSIA)	TANK DIAMETER D (FT.)	AVERAGE VAPOR SPACE HEIGHT H (FT.)	AVERAGE AMBIENT DIURNAL TEMP. CHGE. ΔT ($^{\circ}$ F)	PAINT FACTOR F_p	ADJUSTMENT FACTOR SMALL TANKS C	PRODUCT FACTOR K_C
Mineral Spirits	2.26×10^{-2}	140	<0.193	14.7	10.5	8.5	21.5	1.40	0.55	1.0
No. 2 Fuel Oil	2.26×10^{-2}	130	0.097	14.7	10.5	8.5	21.5	1.40	0.55	1.0
Asphalt	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cutback No. 1*	2.26×10^{-2}	140	<0.193	14.7	10.5	12.75	21.5	1.40	0.55	1.0
Cutback No. 2*	2.26×10^{-2}	140	<0.193	14.7	10.5	12.75	21.5	1.40	0.55	1.0
Cutback No. 3*	2.26×10^{-2}	140	<0.193	14.7	10.5	12.75	21.5	1.40	0.55	1.0
Cutback No. 4*	2.26×10^{-2}	140	<0.193	14.7	10.5	12.75	21.5	1.40	0.55	1.0

*The vapor space above cutback asphalt will be saturated with mineral spirits, No. 2 fuel oil or a combination of the two. Since mineral spirits is the most volatile diluent, it has been used to calculate "worst case," i.e., maximum emissions.

TABLE 3-2
CALCULATION OF BREATHING LOSS (CONT'D)

TANK	FACTOR	M _v	$\left(\frac{P}{P_A - P}\right)^{0.68}$	D ^{1.73}	H ^{0.51}	ΔT ^{0.50}	F _p	C	K _C	L _B
Mineral Spirits	2.26 x 10 ⁻²	140	<0.053	58.43	2.98	4.64	1.40	0.55	1.0	104.32
No. 2 Fuel Oil	2.26 x 10 ⁻²	130	0.033	58.43	2.98	4.64	1.40	0.55	1.0	60.32
Asphalt	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cutback No. 1*	2.26 x 10 ⁻²	140	<0.053	58.43	3.66	4.64	1.40	0.55	1.0	128.13
Cutback No. 2*	2.26 x 10 ⁻²	140	<0.053	58.43	3.66	4.64	1.40	0.55	1.0	128.13
Cutback No. 3*	2.26 x 10 ⁻²	140	<0.053	58.43	3.66	4.64	1.40	0.55	1.0	128.13
Cutback No. 4*	2.26 x 10 ⁻²	140	<0.053	58.43	3.66	4.64	1.40	0.55	1.0	128.13

*The vapor space above cutback asphalt will be saturated with mineral spirits, No. 2 fuel oil or a combination of the two. Since mineral spirits is the most volatile diluent, it has been used to calculate "worst case," i.e., maximum emissions.

TABLE 3-3
CALCULATION OF WORKING LOSS

TANK	FACTOR	MOLECULAR WT. OF VAPOR M_v (LB/LB MOL)	TRUE VAPOR PRESSURE P (PSIA)	TRUE VOLUME V (GAL.)	NUMBER OF ANNUAL TURNOVERS OF TANK VOLUME N	TURNOVER FACTOR K_N	PRODUCT FACTOR K_C	WORKING LOSS L_w (LB/YR)
Mineral Spirits	2.40×10^{-5}	140	<0.193	9,720	61.73	0.61	1.0	237.32
No. 2 Fuel Oil	2.40×10^{-5}	130	0.097	9,720	61.73	0.61	1.0	110.77
Asphalt	NA	NA	NA	NA	NA	NA	NA	NA
Cutback No. 1*	2.40×10^{-5}	140	<0.193	15,000	59.87	0.60	1.0	349.42
Cutback No. 2*	2.40×10^{-5}	140	<0.193	15,000	59.87	0.60	1.0	349.42
Cutback No. 3*	2.40×10^{-5}	140	<0.193	15,000	59.87	0.60	1.0	349.42
Cutback No. 4*	2.40×10^{-5}	140	<0.193	15,000	59.87	0.60	1.0	349.42

*The vapor space above cutback asphalt will be saturated with mineral spirits, No. 2 fuel oil or a combination of the two. Since mineral spirits is the most volatile diluent, it has been used to calculate "worst case," i.e., maximum emissions.

Combined Breathing and Working Losses

The total losses are simply the sums of the respective breathing and working losses as indicated in Table 3-4, "Calculation of Combined Loss."

TABLE 3-4
CALCULATION OF COMBINED LOSS

TANK	BREATHING LOSS (LBS/YR)	WORKING LOSS (LBS/YR)	TOTAL LOSS		
			(LBS/YR)	(LBS/HR)	(TONS/YR)
Mineral Spirits	104.32	237.32	341.64	0.039	0.171
No. 2 Fuel Oil	60.32	110.77	171.09	0.020	0.086
Asphalt	NA	NA	NA	NA	NA
*Cutback No. 1	128.13	349.42	477.55	0.055	0.239
*Cutback No. 2	128.13	349.42	477.55	0.055	0.239
*Cutback No. 3	128.13	349.42	477.55	0.055	0.239
*Cutback No. 4	128.13	349.42	477.55	0.055	0.239

*Combined loss calculated using mineral spirits as a surrogate parameter.

Maximum Emissions

The maximum emissions rate occurs when the asphalt is mixed with mineral spirits. These calculations have maximized emissions accordingly by using mineral spirits as a representative diluent. Emissions will be reduced when No. 2 fuel oil is used. Although an instantaneous peak emissions rate could be calculated, it would be a meaningless value because the absolute VOC emissions

from any individual tank is small, the tanks are filled intermittently and there will never be a time when all the tanks are filled simultaneously at peak loading rates. Consequently, the maximum emissions rate is considered to be equivalent to the actual emissions for these tanks.

Allowable Emissions

Chapter 17-2.660(2)(a) FAC, adopts by reference the federal New Source Performance Standards (NSPS) found in 40 CFR 60 including Subpart I--Standards of Performance for Hot Mixed Asphalt Facilities, Subpart UU--Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture, and Subpart Kb--Standards of Performance for Volatile Organic Liquid Storage Vessels. However, each tank must be compared to the exceptions and exemptions of § 60.110b to determine specific rule applicability.

MINERAL SPIRITS AND NO. 2 FUEL OIL TANKS

The mineral spirits and No. 2 fuel oil tanks are completely exempted by § 60.110b(a), because the volume of each tank (9,720 gallons) is less than 40 m³ (10,568 gallons).

ASPHALT TANK

The asphalt tank is exempted because uncut asphalt is non-volatile.

CUTBACK TANKS

Since the volume of each cutback tank (15,000 gallons) falls below 75 m³ (19,815 gallons), they may be subject only to the minor limitations of § 60.116b(a) and (b). These paragraphs require maintenance of records indicating the dimensions of the storage vessel and an analysis of the capacity of the vessel. Even if these minor recordkeeping provisions are judged to apply, the tanks are exempt from the General Provisions, the balance of Subpart Kb and therefore, from permitting.

The combined emissions from all tanks vented to the atmosphere (mineral spirits, No. 2 fuel oil, asphalt, cutback) is only 1.213 tons/year. Such extremely low emissions do not constitute a significant emission rate for VOC, which according to 17-2.500(2)(e)2, Table 500-2, is equivalent to 40 tons per year.

Additionally, as the combined emissions from all tanks vented to the atmosphere are much less than three pounds in any one hour and 15 pounds in any one day (actual emissions equal 0.279 lb/hr and 6.696 lb/day), the exceptions in rule 17-2.650(1)(c), FAC, apply to the permit, recordkeeping and compliance reporting requirements of rule 17-2.650(1)(b), FAC.

Potential Emissions

Since there are no emission control devices specifically dedicated to these tanks, the potential emissions are equal to the actual emissions.

ATTACHMENT 5

SECTION III.E

FUELS

The No. 2 fuel oil is not used to elevate the temperature of asphalt but only to maintain the as delivered temperature at 270°-280°F. It's intermittent use is required to keep the asphalt in a pumpable condition.

The average use of No. 2 fuel oil is only 3.0 gallons per hour for a maximum of 3.0 hours a day.

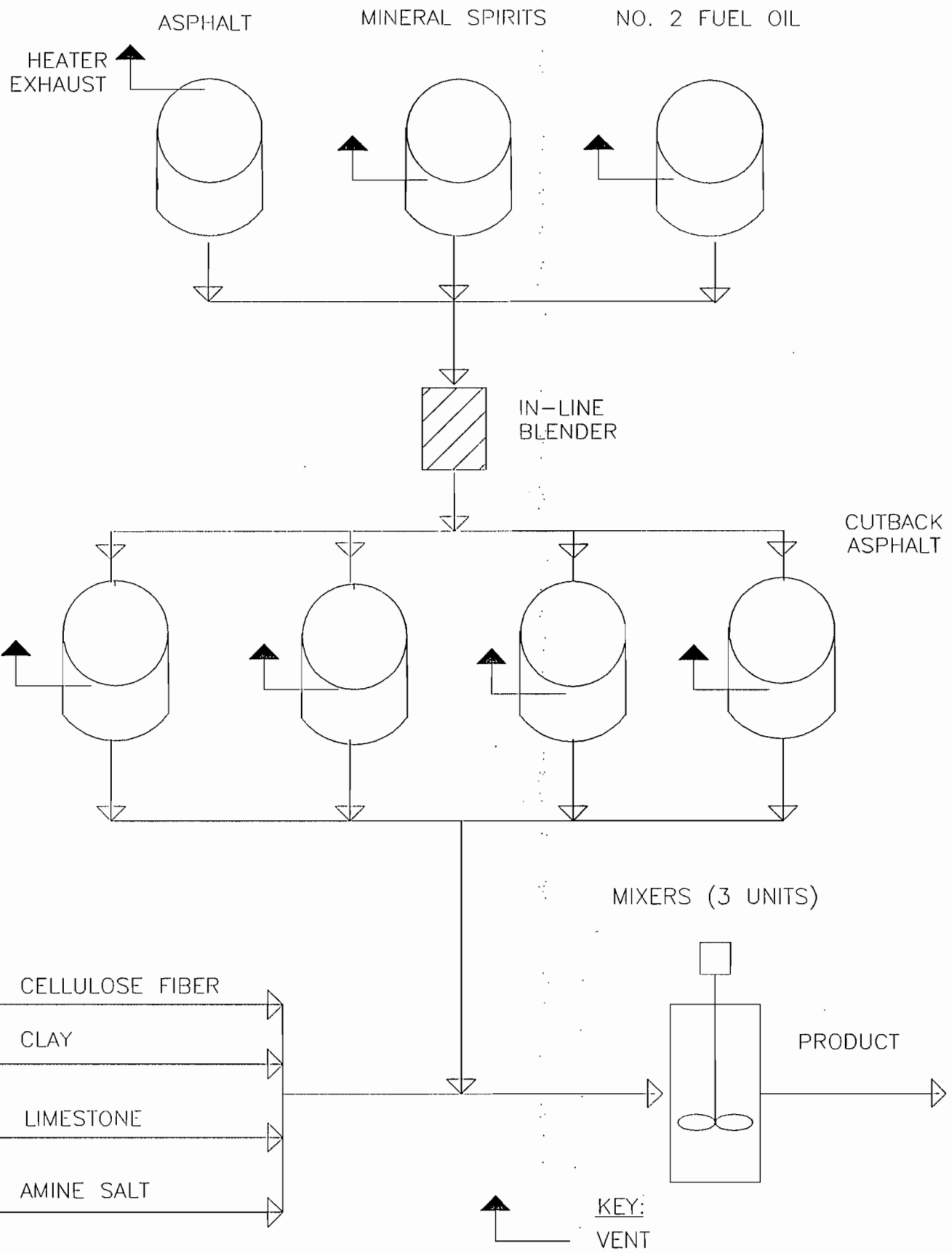
$$\begin{aligned} \text{Max. heat input} &= 0.1396 \text{ mm Btu/gal} \times 3.0 \text{ gal/hr} \\ &= 0.4188 \text{ mm Btu/hr} \end{aligned}$$

ATTACHMENT 6

SECTION III H

EMISSION STACK GEOMETRY AND FLOW CHARACTERISTICS

TANK	HEIGHT (FT.)	STACK DIAMETER	FLOW (ACFM)	FLOW DSCFM	EXIT TEMP. (°F)	VELOCITY (FPS)
Mineral Spirits	18'5.5"	4"	Negligible	Negligible	80.6	Negligible
No. 2 Fuel Oil	18'5.5"	4"	Negligible	Negligible	80.6	Negligible
Asphalt	27'0"	8"	110.7	65.2	375.0	158.4
Cutback No. 1	27'0"	4"	Negligible	Negligible	80.6	Negligible
Cutback No. 2	27'0"	4"	Negligible	Negligible	80.6	Negligible
Cutback No. 3	27'0"	4"	Negligible	Negligible	80.6	Negligible
Cutback No. 4	27'0"	4"	Negligible	Negligible	80.6	Negligible



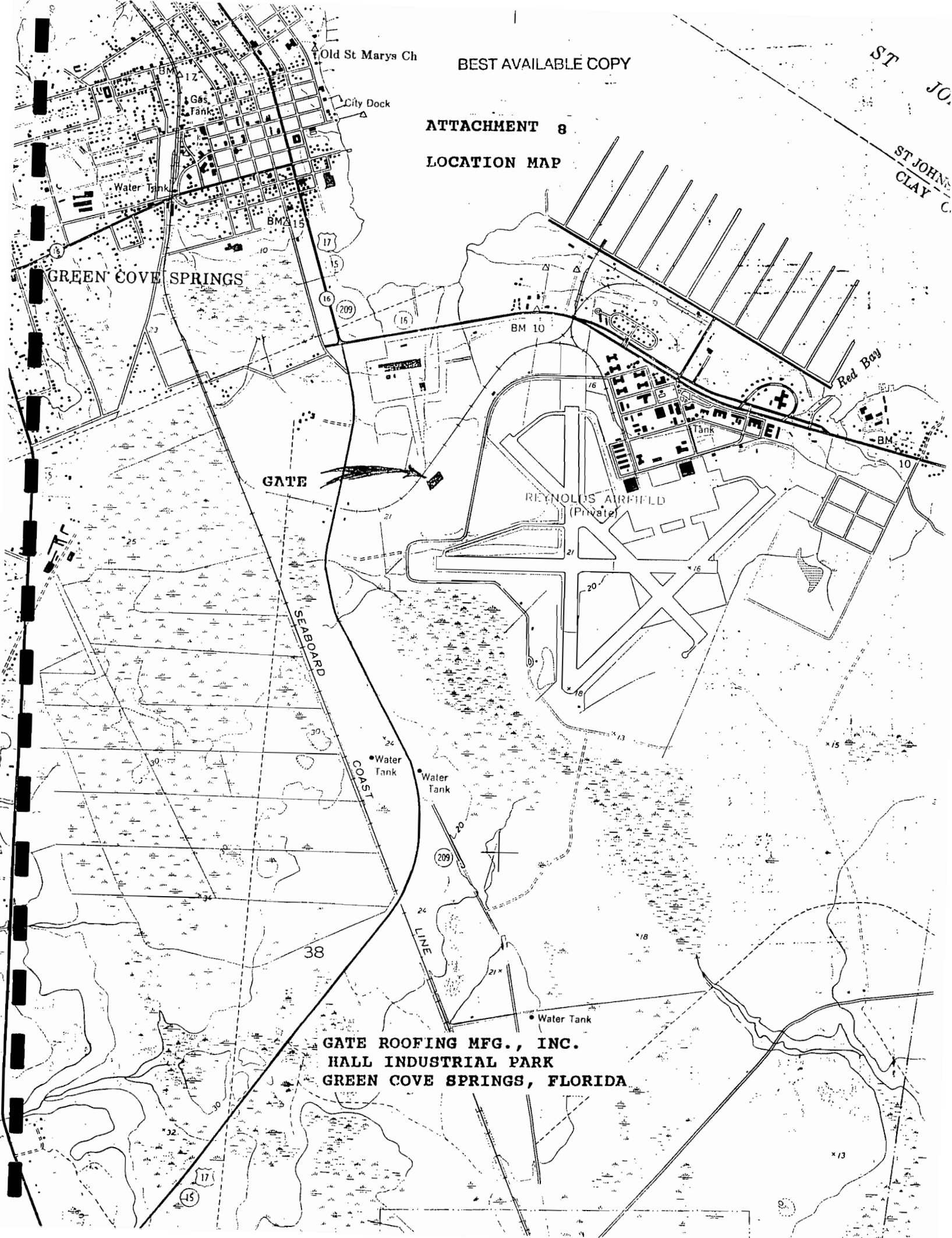
GATE ROOFING MFG.
 GREEN COVE SPRINGS, FLORIDA

ATTACHMENT 7. PROCESS FLOW
 MISSIMER AND ASSOCIATES
 ENVIRONMENTAL AND GROUNDWATER CONSULTANTS
 JACKSONVILLE, FLORIDA

BEST AVAILABLE COPY

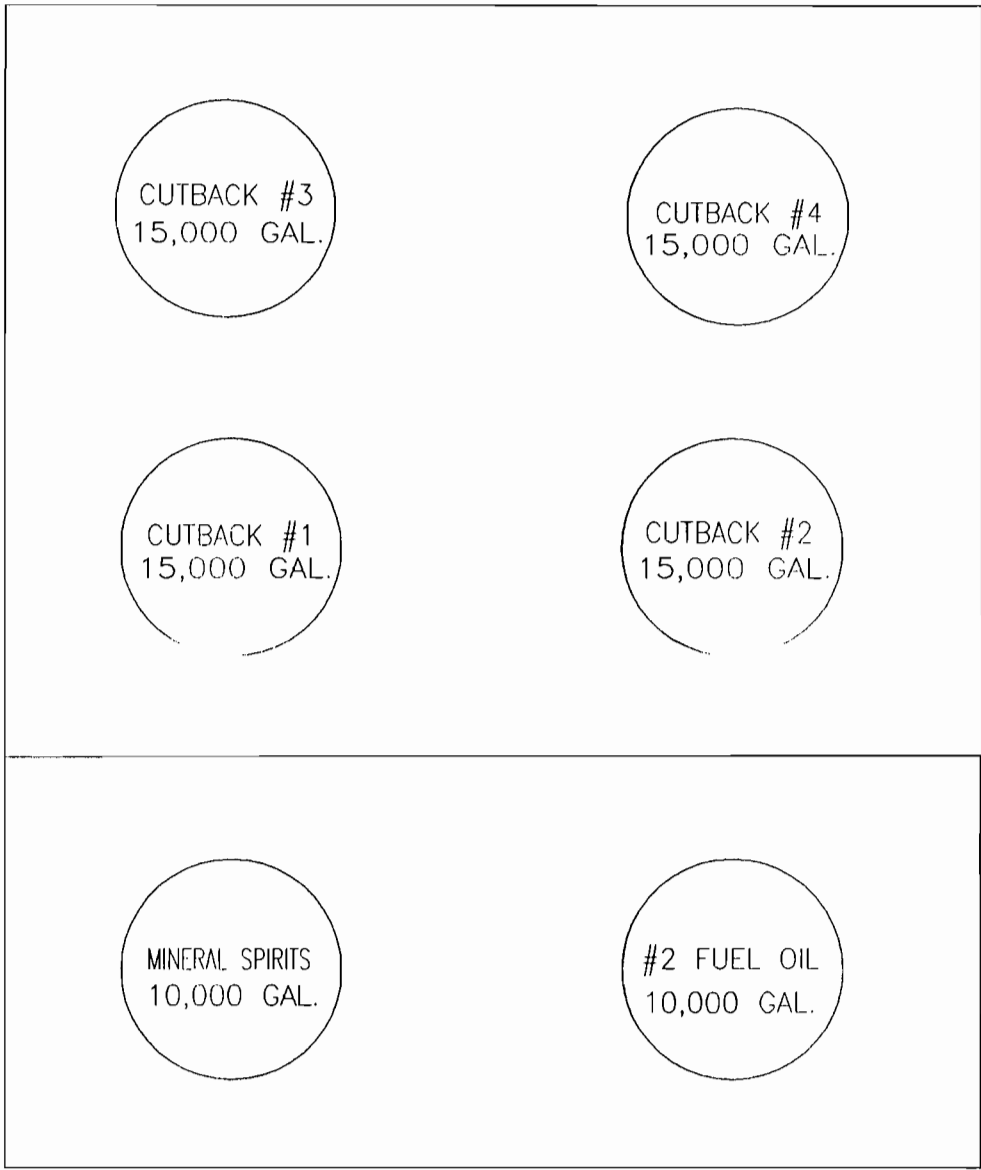
ATTACHMENT 8

LOCATION MAP



GATE ROOFING MFG., INC.
HALL INDUSTRIAL PARK
GREEN COVE SPRINGS, FLORIDA

ST JOHNS
CLAY C



GATE ROOFING MFG.
GREEN COVE SPRINGS, FLORIDA

ATTACHMENT 9. TANK FARM LAYOUT
MISSIMER AND ASSOCIATES
ENVIRONMENTAL AND GROUNDWATER CONSULTANTS
JACKSONVILLE, FLORIDA