

City of
Gainesville

Inter-Office Communication

Planning Division
x5023, FAX x3259, Station 12

TO: Wayne Bowers, City Manager

DATE: September 22, 2004

FROM: Planning Staff

SUBJECT: Petition 30WSU-01CC - Legislative No. 001254 Additional Materials

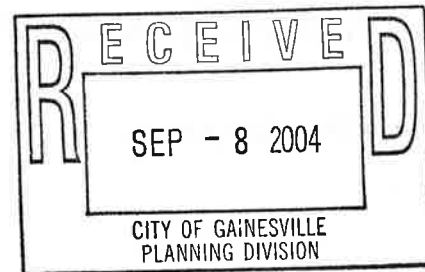
Staff has received the following additional material from the petitioner that will be useful for review by the City Commission.

The additional information includes:

1. Questions prepared by the North West Gainesville Coalition of Homeowners Associations.
2. Responses to North West Gainesville Coalition of Homeowners (Marilyn Walker) prepared by the petitioners.
3. Responses by the petitioners to questions from Planning staff.
4. Revised pages for report filed with the application.
5. Asphalt Plant Model Number received on September 20, 2004.
6. Letter from Gary Yelvington stating the intent of the Conrad Yelvington Distributors, Inc. to comply with Sec. 30-345 dated September 8, 2004.
7. Memo from Sergio Reyes to Agustin Olmos dated September 22, 2004.

Marilyn Walker

From: "Marilyn Walker" <walkermarilyn@bellsouth.net>
To: "marilyn walker" <walkermarilyn@bellsouth.net>
Sent: Wednesday, September 08, 2004 9:55 AM
Attach: ATT00050.html
Subject: Letter to Carolyn Morgan



----- Original Message -----

From: Marilyn Walker
To: marilyn walker
Sent: Tuesday, August 31, 2004 10:21 AM

NORTH WEST GAINESVILLE COALITION OF HOMEOWNERS ASSOCIATIONS

**Carolyn Morgan
Planning Department**

Thank you for providing information on the Yelvington Asphalt Plant. After the Northwest Gainesville Coalition of Homeowners Association reviewed the proposal we had some questions.

Note: The 3 abbreviations in the list refer to the Water and Air research Reports.

SUP (Special use Permit)
GPS (General Performance Standards)
WSUP (Wellfield special Use Permit)

Have you received any reports (Staff Response Forms) back

from other city
departments regarding any concerns on this project?

Will you please provide the answers in writing?

Thank you.

- >
- >
- > Questions on the Yelvington Asphalt Plant
- >
- > 1. On page 15 of the SUP it states that the plant will be equipped with
 - > a "Blue Smoke Package." On page 2 of the same document it says that a
 - > fan will draw "blue smoke" from the top of the HMA silo and inject it
 - > into the drier burner. Can you please describe this system in more
 - > detail? We are especially concerned to know if there are parts of the
 - > blue smoke system where gases could be released to the atmosphere before
 - > they reach the burner.
- >
- > 2. On page 16 of the SUP it quotes Gainesville code 30-345 which
 - > describes a process by which a person designated by the city manager can
 - > make a ruling about excessive odor beyond the property line of an odor
 - > emitter. The code says that the operator of the odor emitter can
 - > disagree with the assessment of the enforcing officer and request that
 - > chemical measurements be made. This code does not describe the rights
 - > of residents outside the boundary line to disagree with the enforcing
 - > officer. Is there any other Gainesville code which gives residents
 - > specific rights regarding the determination of excessive odor?
- >

- > 3. On page 8 of the WSUP it says that a hazardous material called SPX-7
 - > will be used as a "release agent for truck boxes and other metal surfaces." Can you give a list of the ingredients in SPX-7?
 - >
- > 4. On page 1 of the GPS it says that the plant will be equipped with
 - > adequate safety devices to prevent fire and will also be equipped with
 - > adequate fire fighting equipment. Can you please describe these safety devices and fire fighting equipment in detail?
 - >
- > 5. As a follow-up to question #4 above, on page 4 of appendix A of the WSUP it states that excessive water spray should not be used on burning asphalt and further states that runoff water from fighting burning asphalt must be kept out of sewers and water sources. What specific steps have been taken to avoid the use of excessive water on burning asphalt and to keep the runoff from such use from entering the sewer system or the ground water system?
 - >
- > 6. On page 3 of the SUP it says that an Air Construction Permit from the Florida Department of Environmental Protection has been applied for. Has this permit been issued? If so, can we get a copy of it?
 - >
- > 7. Table 2 on page 4 of the SUP lists estimated concentrations of air pollutants from the proposed asphalt plant. How exactly were

these

> estimates calculated? At what distance from the plant do they apply?

> Do these estimates include fugitive emissions?

>

> 8. Note 1 on page 5 of the SUP says that DEP (FDEP?) is expected to

> adopt standards regarding fine particle PM2.5. Have these standards

> been adopted?

>

> 9. The section on noise levels beginning on page 9 of the SUP is

> difficult to understand. On page 10 it appears to show that actual

> measurements indicate that the existing facility already exceeds the

> city noise level standards. Then it describes a mathematical model that

> purports to show that "the present sound environment is in compliance

> with the Alachua County Ordinance." It is not clear why the report

> changes from using the city ordinance to the county ordinance. It is

> also not clear how this makes the existing plant in compliance with the

> city ordinance. Finally, it is not clear how any of this relates to

> making the proposed asphalt plant in compliance with the city

> ordinance. Can you please explain this section in non-technical

> language?

>

> 10. On page 13 of the SUP it says that the plant will be permitted to

> run 24 hours a day. Given that measurements show that the existing

> facility already exceeds city noise levels, would it not be

reasonable

- > to restrict the hours of operation of the asphalt plant to exclude
- > normal sleeping hours?

- >

- > 11. On page 8 of the WSUP it says that facilities in a wellfield

- > protection zone which store hazardous materials must obtain a hazardous

- > materials storage license from the county. Has this facility obtained

- > such a license? If so, can we get a copy of it?

- >

- > 12. There are various places throughout all three reports where

- > statements are made as though they were statements of fact but with

- > little or no substantiation. It would appear that these are actually

- > statements of opinion on the part of the report writer. We would like

- > to make particular note of the following instances:

- >

- > A. On page 15 of the SUP it states, regarding odor levels, "The

- > measures described above will satisfactorily control potential

- > odors." No specific details are given above as to the measures to be

- > taken to control odors, they are only described in general. Nor are

- > any guarantees offered that these general measures will in fact control

- > odors.

- >

- > B. On page 16 of the SUP it states "Any odor impacts will not

- > violate applicable local, regional, state, or federal limits." Again

- > no specific details are given and no guarantee is offered.

- >

- > C. On page 6 of the SUP it states "In the field of HMA plants, the

- > proposed APAC plant contains the best available technology."

No

> industry or government standard is cited for determining whether or not

> the plant contains the best available technology.

>

> D. Also on page 6 of the SUP it states" In addition, the APAC will

> use Best Management Practices to control generation of fugitive

> pollutants..." Again, no industry or government standard of Best

> Management Practices is cited.

>

> E. On page 12 of the GPS table 7 lists threshold limit values

> (TLVs) for various air pollutants. On this same page, the author notes

> that "...TLVs are not standards." Indeed they are "merely guidelines"

> used by industrial hygienists. If these are not standards there does

> not appear to be any objective value to including them in the report.

>

> F. On page 1 of the WSUP it states that in regard to the criteria

> for a wellfield special use permit " The operator has committed to

> practices and controls that exceed the stated requirements."

The only

> practice/control cited is that the HMA binder storage tanks will have

> secondary containment. There is no specific legally binding document

> from the operator cited to substantiate this claim.

>

>

Response to Questions from Marilyn Walker

Question 3: "On page 8 of the WSUP it says that a hazardous material called SPX-7 will be used as a 'release agent for truck boxes and other metal surfaces,' Can you give a list of the ingredients in SPX-7?"

Response: The list on page 8 is not a list of hazardous materials but a list of all materials expected to be kept on site.

The list of the specific ingredients in SPX-7 is not available because the company has a patent application pending. The Material Safety Data Sheet is provided in the appendix to the WSUP. It states that SPX-7 contains no hazardous materials. The toxicological information provided indicates that the material is irritating but not toxic. This material has been approved for the contemplated use by several states, including, but not limited to, Alabama, Illinois, Ohio, Georgia, Nevada, Louisiana, Maryland, North Carolina, and Indiana.

Question 4: "On page 1 of the GPS it says that the plant will be equipped with adequate safety devices to prevent fire and will be equipped with adequate fire fighting equipment. Can you please describe these safety devices and fire fighting equipment in detail?"

Response: The requested detailed description cannot be provided at this time because in accordance with the procedures of the City of Gainesville, The Fire Protection Engineer will advise on such needed equipment when the building permit is under consideration. Based upon experience with such asphalt plants and concerns raised at the Site Plan Review, we expect that in addition to the required fire hydrant, the storage of fuel will require conformance with National Fire Prevention Association Standards 30.

Question 5: "As a follow-up to question #4 above, on page 4 of appendix A of the WSUP it states that excessive water spray should not be used on burning asphalt and further states that run off water from fighting burning asphalt must be kept out of sewers and water sources. What specific steps have been taken to avoid the use of excessive water on burning asphalt and keep the runoff from such use from entering the sewer system or the ground water system?"

Response: The asphalt is stored within a secondary containment area. A small asphalt fire may be extinguished by CO₂, dry chemical, foam, or water spray. Extinguishers containing the extinguishing media preferred by the City of Gainesville Fire Protection Engineer will be located at the facility. A large fire will require the City of Gainesville Fire Department. In either case, the extinguishing media is expected to be contained within the structure. It is possible that excess media that has not been in contact with the products of combustion may be released to the stormwater system. These materials (CO₂, bicarbonate, and water) are considered benign. The AFFF/ATC foam does not flow and may be picked up or absorbed on an inert material such as vermiculite.

Question 6: "On page 3 of the SUP it says that an Air Construction Permit from the Florida Department of Environmental Protection has been applied for. Has the permit been issued? If so, can we get a copy of it?"

Response: The Air Construction Permit has not been issued.

Question 7: "Table 2 on page 4 of the SUP lists estimated concentrations of air pollutants from the proposed asphalt plant. How exactly were these estimates calculated? At what distance from the plant do they apply? Do these estimates include fugitive emissions?"

Response: The referenced table refers to the Air Pollution Emissions section of the GPS at the bottom of page 4. As stated in the GPS on page 10, "Estimates using a computer-based air dispersion model (SCREEN3) and emission factors from a USEPA publication (AP-42)" were used to compute the maximum concentrations. The distance was whatever modeling distance gave the maximum value for the pollutant. Generally, maximum values occur near the APAC property boundary. The estimates do include fugitive emissions.

Question 8: "Note 1 on page 5 of the SUP says that DEP (FDEP?) is expected to adopt standards regarding fine particulate PM2.5. Have these standards been adopted?"

Response: We are referring to the Florida Department of Environmental Protection (FDEP). The National standard has not yet been adopted by the State of Florida.

Question 11: "On page 8 of the WSUP it says that facilities in a wellfield protection zone which stores hazardous materials must obtain a hazardous materials storage license from the county. Has this facility obtained such a license? If so, can we get a copy of it?"

Response: The facility has not yet obtained such a license. It must be obtained before operations can begin.

Question 12: "There are various places throughout all three reports where statements are made as though they were statements of fact but with little or no substantiation. It would appear that these are actually statements of opinion on the part of the report writer. We would like to make particular note of the following instances:"

Question 12A: "On page 15 of the SUP it states, regarding odor levels, 'The measures described above will satisfactorily control potential odors.' No specific details are given above as to the measures to be taken to control odors, they are only described in general. Nor are any guarantees offered that these general measures will in fact control odors."

Response: The specific measures for controlling odors are presented in the referenced text. The measures will be appropriately sized to the equipment generating the odorous materials. Blueprints of the equipment will be prepared when it is known whether the plant will be constructed. The specific measures planned for this plant are:

1. Equipping the asphalt binder storage tanks with condensers to collect organic emissions and return them to the storage tanks.
2. Installing a collection system on the vents from the HMA silos to collect fumes from the silos and conveyor and duct them to the inlet fan of the burner.
3. Covering truck beds with impermeable tarps as soon as they are loaded to limit the quantity of air that organics have to vaporize into.

It is impossible to guarantee that there will not be conditions under which odor may be detected beyond the property boundary. However, application of these methods at other asphalt plants has controlled these primary sources of odors sufficiently to meet all existing codes and regulations.

Question 12B: “On page 16 of the SUP it states ‘Any odor impacts will not violate applicable local, regional, state, or federal limits.’ Again no specific details are given and no guarantee is offered.”

Response: It is impossible to guarantee that there will not be conditions under which odor may be detected beyond the property boundary. However, application of these methods at other asphalt plants has controlled these primary sources of odors sufficiently to meet all existing codes and regulations.

Question 12D: “Also on page 6 of the SUP it states ‘In addition, the APAC will use Best Management Practices to control generation of fugitive pollutants...’ Again no industry or government standard of Best Management Practices is cited.”

Response: The specific practices are listed at the top of page 7 of the SUP. This list was developed in consultation with Alachua County Environmental Protection Department. A government standard for control of fugitive pollutants at hot mix asphalt plants was not located.

Question 12E: On page 12 of the GPS table 7 lists threshold limit values (TLVs) for various air pollutants. On this same page, the author notes that ‘... TLVs are not standards.’ Indeed they are ‘merely guidelines’ used by industrial hygienists. If these are not standards there does not appear to be any objective value to including them in the report.”

Response: The objective value is providing a benchmark for comparison.

Question 12F: “On page 1 of the WSUP it states that in regard to the criteria for a wellfield special use permit ‘The operator has committed to practices and controls that exceed stated requirements.’ The only practice/control cited is that the HMA binder storage tanks will have secondary containment. There is no specific legally binding document from the operator cited to substantiate this claim.”

Response: A comparison of the stated requirements with the list of practices and controls presented in the WSUP demonstrates that the operator has committed to practices and controls that exceed these requirements.

Response to Carolyn Morgan's Concerns

1. A reference to a roofed fuel storage area on page 2 of the SUP was incorrectly not deleted from the report. The fuel storage area will not be roofed.
2. The truck traffic volumes presented on page 13 and 14 of the SUP based on a typical production rate of 250,000 TPY through error do not agree with the concurrency numbers.

An amendment to the SUP has been prepared consisting of four corrected pages to the SUP with a September date to eliminate the reference to the roofed fuel area and to adjust the truck numbers.

The revised text regarding the trucks says:

The plant's annual production will be limited to 343,000 tons per year by FDEP air permit. Annual traffic volume for this level of production would be 24,946 truck trips. Assuming 156 work days per year, this level of production will result in an average of 160 truck trips per day. About 70% (112) of these trips are expected to occur between 7 a.m. and 5 p.m. and the remaining 48 trips are expected to occur between 5 p.m. and 7 a.m.

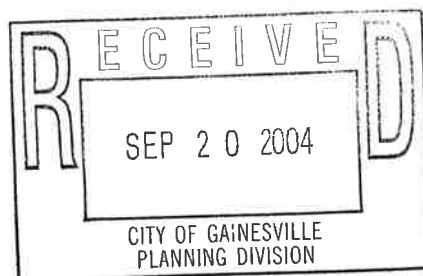
City of Gainesville, Florida, Code of
Ordinances, Section 30-70:
Use by Special Use Permit

Prepared for

APAC – Southeast, Inc.
First Coast Division
P.O. Box 24728
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September 2004
04-5816

Section 30-70 General Industrial District (I-2): Use by Special Use Permit

Introduction

In accordance with Code of Ordinances City of Gainesville, Florida, Section 30-70, General industrial district (I-2), this report provides requested information regarding use of I-2 zoned property for SIC IN-2951 Asphalt paving mixtures and blocks by special use permit. This report specifies expected air emissions, surface and groundwater emissions, noise levels, truck traffic volumes (including time-of-day level(s), odor levels, and glare impacts, and compatibility of these emissions and impact levels with other properties, uses and neighborhoods within 2,000 feet. The code requires that the report indicate that these impacts will not violate local, regional, state, or federal limits; and that "Best Available Technology" (BAT) is being used to control impacts.

Hot Mix Asphalt (HMA) is a mixture of aggregate (crushed stone, gravel, recycled asphalt product, and sand), and asphalt binder. For special mixes, lime, mineral fiber, and/or crumb rubber may also be added. The asphalt is the "glue" that binds the aggregate into a stable structure.

There are two basic types of plants used to manufacture Hot Mix Asphalt (HMA) - Batch Plants and Drum Plants. As the name implies, in a Batch Plant, raw materials are added to a large, heated mixer to produce a batch of HMA. A Drum Plant is a continuous operation, continuously receiving raw materials and producing HMA. The plant proposed to be constructed by APAC - Southeast, Inc. is a drum mix asphalt plant. The components of the proposed plant are:

- Cold Feed Bins
- Emission Controls
- Double Barrel Drum Plant (Drier and Mixer)
- HMA Storage Silos
- Aggregate Storage
- Recycled Asphalt Product (RAP) Storage
- Lime Storage Silo
- Ancillary equipment to move and manage materials
- Storage tanks for asphalt binder, diesel fuel, and plant fuel

Aggregates and RAP will be stored in stockpiles on a paved surface. Lime will be stored in a protected silo. Rain water falling on the stockpiles will be collected and transported to the collection basin. After settling suspended matter, the water will pass through an on-site wetland. From the wetland, it will be released to the natural system receiving water from the wetland.

Aggregates are typically moved from the stockpiles to the cold feed bin using a front-end loader. Cold feed bins are used to accurately meter the different aggregates used in the mix to the drying drum. The amount of each aggregate is controlled by a combination of the gate opening at the bottom of the bin and conveyor belt speed. A conveyor below the cold feed bins transfers the aggregate to the dryer where the aggregate is dried and heated. Because drum plants produce mix continuously, a weigh scale is used to weigh the aggregate before it enters the dryer so the amount of asphalt binder can be accurately added.

Aggregates are dried and heated in the rotating drum as they are tumbled through a hot air stream. The hot air is created by a burner and is pulled through the drum by a fan. The burner uses fuel oil as

its energy source. The direction of air flow relative to the direction of aggregate flow for the proposed plant is Counter-Flow in which aggregates move in the opposite direction as the hot air.

As hot air passes through the aggregate it picks up some fine sand and dust particles. These particles are removed by the emissions control system before the air is released into the atmosphere. The proposed plant will have primary and secondary collectors to remove these particles. The fine sand and some dust is collected in the primary collector, a cyclone, and returned to the mix. The secondary collector, a baghouse filter, removes the remaining fine dust. This dust is also returned to the mix.

The HMA is made continuously in the second barrel of the drum. This barrel is a shell located around the drier barrel. In this second barrel, there is no flame. It is heated by recovery of waste heat from the drier barrel. This outer shell of the drum receives the aggregate after it has been dried and heated. The aggregate moves to the outer shell of the drum and travels back down the length of the drum. In this outer barrel, recycled material (RAP) is first added to the aggregate mix. After the temperatures of the recycle and virgin aggregate equalize and the asphalt cement in the recycle returns to a liquid state and has thinly coated the aggregate, liquid asphalt cement is injected into the mixing chamber. Polymers, if used, enter the mixing chamber with the asphalt cement. As the mix moves through the mixing chamber, it is continually stirred by mixing paddles. Baghouse fines, lime and other fine additives enter the mixing chamber at this point and become embedded in the thick layer of asphalt coating the rock. After thorough mixing, the HMA is moved to a storage silo.

Drum mix plants must have storage silo(s) since they produce mix continuously. Storage silos are insulated and may be heated to prevent heat loss. A mix may be stored in a silo for days. Mix is discharged from the silo into trucks for transportation to the paving site. Liquid asphalt binder or cement, the "glue" used to hold the aggregate and any additives together in hot mix asphalt, is a petroleum product. During transfer to a silo, hydrocarbon droplets can escape. This is called "blue smoke." The proposed plant provides a system to capture and dispose of blue smoke. Powerful fans pull the air from the top of the silo(s) and inject it into the flame in the aggregate drier portion of the drum plant.

Before receiving a load of HMA, the boxes on the back of the delivery trucks are washed as necessary in a closed cycle wash to remove soil that could contaminate the HMA product. For example, if a truck had been used to haul sand, its cargo area is washed to remove any residual sand. Each truck has a bio-degradable, water-based solution sprayed on the interior of the delivery truck box before receiving a load of HMA. The purpose of this material is to prevent HMA from adhering to the metal box.

The design of the area proposed for storage of asphalt binder, plant fuel, and equipment fuel will have secondary containment, to control any unplanned releases. Accumulated stormwater will be drawn off within one week after a rainfall event or as provided in the facility's FDEP stormwater discharge permit. Water with a sheen will not be discharged without passing through treatment equipment such as an oil separator and filter as may be required by the FDEP stormwater discharge permit. The station for trucks delivering these materials to the site will be adjacent to this area and will be curbed to control any unplanned releases during the transfer of products.

The proposed plant controls its production using computers and automation. When necessary, it may still be operated manually. The proposed APAC – Southeast, Inc. HMA plant is capable of producing quality hot mix asphalt for use on streets, highways, parking lots, driveways, bike trails, and other structures.

Properties, Uses and Neighborhoods

The proposed Hot Mix Asphalt (HMA) plant will be constructed and operated on a 4.9-acre parcel as shown in Figure 1 and designated the APAC property. This area will be leased from Conrad Yelvington

Distributors, Inc. (CYD). CYD operates an aggregate distribution plant to the west of the APAC property and owns a 49-acre parcel that includes the APAC property. Twenty-seven parcels including highway right-of-way were identified within 2,000 feet of the property lines of the APAC property. These properties were identified on land use maps from the City of Gainesville. They consist of one agricultural/timber parcel, one conservation parcel, one single family parcel, and twenty-three industrial (I-1 and I-2) zoned parcels. As shown in Figure 2, the properties adjacent to the APAC property are in industrial or agriculture/timber use (DOR Code 55). The existing land uses among the industrial zoned properties are one miscellaneous residential (DOR Code 07), one utility (DOR Code 91), one mineral processing (DOR Code 47), three repair shop (DOR Code 25), four light manufacturing (DOR Code 41), four vacant (DOR Code 40), and nine warehouse (DOR Code 48). There are also two right-of-way parcels (DOR Code 94). It should be noted that a PUD called Greenways of Gainesville has been approved but not yet constructed across the railway and US 441 west of the APAC property.

Currently, there are no residential neighborhoods located within 2,000 feet of the APAC property. Considering the minimum distance from the boundary of the APAC property to the boundary of existing residential neighborhoods, the closest neighborhoods are Northwood Oaks at about 2,100 feet, then Hidden Lake and Buck Bay at just over 2,400 feet, and Pineridge Villas located just over 2,700 feet.

Property adjacent to the CYD property, as shown in Figure 2, is zoned industrial (I-2) to the south, single family (PUD) across the railroad and US 441 to the west, agricultural (AG) to the north, and residential (PD) across SR 121 to the east. Portions of Hidden Lake, Buck Bay, and Greenways of Gainesville are all within 2,000 feet of the CYD property.

Air Emissions

Overall emissions to the atmosphere from the proposed Hot Mix Asphalt (HMA) plant include particulate matter, sulfur dioxide, nitrogen oxides, carbon monoxide, and volatile organic compounds. Emission sources are the dryer/mixer drum, transfer of HMA to the silos and trucks, hot oil heater, and fugitive dust from handling aggregate and recycled asphalt pavement (RAP). The existing aggregate plant is a source of fugitive dust from the movement of front-end loaders and handling of aggregate products. The proposed operation will not cause, create, or allow the emission of air contaminants which at the emission point or within the bounds of the property are in violation of the standards of the Florida Department of Environmental Protection (FDEP).

An Air Construction Permit Application will be filed with FDEP. Using emission factors provided by the US Environmental Protection Agency for the purpose, the permit application will request the following maximum emissions limitations:

TABLE 1
Requested Maximum Air Pollutant Emission Limitations

Pollutant	Requested Maximum Emission Rates	
	(pounds per hour)	(tons per year)
Particulate Matter (PM)	27.8	11.94
Fine Particulate Matter (PM 10)	9.19	3.94
Sulfur Dioxide (SO ₂)	23.2	9.95
Nitrogen Oxides (NO _x)	22.0	9.43

TABLE 1
Requested Maximum Air Pollutant Emission Limitations

Pollutant	Requested Maximum Emission Rates	
	(pounds per hour)	(tons per year)
Carbon Monoxide (CO)	52.0	22.3
Volatile Organic Compounds (VOC)	12.8	5.49

The proposed HMA plant will use control technology to reduce the emission characteristic of hot pavement mixture.

Open storage and open processing operations, including on-site transportation movements, of sand, gravel, recycled asphalt pavement (RAP), and crushed stone will be conducted such that dust and other particulate matter generated will be minimized in accordance with the standards set by FDEP. FDEP has exempted the aggregate plant from air permitting provided water or dust suppressants are used to control fugitive dust. The HMA plant air permit will specify the reasonable precautions to be taken by the facility to control the emissions of similar unconfined particulate matter.

For the proposed HMA plant, reasonable precautions include the following:

- Reducing the storage of crushed rock and gravel on the site to a two day supply for maximum operating levels
- Paving areas used by delivery trucks, supply trucks, and yard equipment to control dust generation
- Sweeping and/or watering paved road surfaces to reduce dust emissions

The proposed HMA plant and the existing CYD plant are expected to generate less than 10 tons of fugitive dust per year. This is relatively coarse particulate matter when compared with particulate matter generated by combustion. It is carried off-site only by highly turbulent winds.

Air toxics (also called hazardous air pollutants) are those air pollutants that are known or suspected to cause cancer or other serious health effects, such as reproductive and birth defects. The degree to which a toxic air pollutant affects a person's health depends on many factors including the quantity and toxicity of the pollutant to which the person is exposed as well as the duration and frequency of exposure. A source of HAPs must be permitted by the state if it emits or has the potential to emit 10 tons per year (tpy) or more of a single HAP or 25 tpy or more of any combination of HAPs. The proposed HMA plant has the potential to emit 1.8 tons of HAPs per year. Over 90 percent of these identified HAPs are the compounds formaldehyde, toluene, hexane, naphthalene, and benzene.

Compatibility with Properties, Uses, and Neighborhoods

The ambient air concentrations resulting from the estimated air emissions of both the proposed HMA plant and the existing aggregate plant have been evaluated with respect to ambient air quality standards and health-based guideline concentrations. This evaluation was conducted for the preparation of a report showing probable compliance with the performance standards of Section 30-345, Land Development Code of the City of Gainesville. A summary of this analysis is shown in Table 2.

been lengthened by locating the plant on the north side of the property. The transmission path will be modified by placing piles of aggregate and recycled asphalt pavement between the HMA plant and the southern boundary of the APAC property, effectively constructing a physical barrier. In addition, absorptive shielding will be installed north of the southern perimeter road that runs the full length of the APAC property. The absorbent material is a soft, spongy blanket specifically designed to absorb some of the energy of the sound waves from the site.

Truck Traffic Volumes (Including Time-Of-Day Level(s))

Truck traffic at the HMA plant will result from RAP, asphalt, and fuel deliveries and from HMA delivery offsite to paving projects. Aggregate such as crushed rock and gravel will arrive at the adjoining property by train and be transferred next door to the proposed HMA plant.

Expected Truck Traffic Volumes

The design production capacity of the asphalt plant is 400 tons per hour. The average load capacity of trucks hauling materials in and out of the plant is 20 tons. The greatest truck traffic volume would result during full production, with simultaneous delivery of raw materials. This scenario would result in 30 truck trips per hour, as follows:

Raw material delivery: 140 tons/hour divided by 20 tons/truck =	7 trips/hour
HMA product delivery: 400 tons/hour divided by 20 tons/truck =	<u>20 trips/hour</u>
	27 trips/hour

This truck traffic volume is based on the maximum production rate per hour, and is not representative of typical daily or annual production.

The plant's annual production will be limited to 343,000 tons per year by FDEP air permit. Annual traffic volume for this level of production would be 24,946 truck trips.

Assuming 156 work days per year, this level of production will result in an average of 160 truck trips per day. Almost 70 percent (112) of these trips are expected to occur between 7 a.m. and 5 p.m. The remaining 48 trips are expected to occur between 5 p.m. and 7 a.m.

Asphalt production is not subject to significant seasonal variation in this area. Raw material delivery is generally spaced throughout the day, with asphalt production concentrated in the morning. Although the plant will be permitted to operate 24 hours per day, typical hours of operation are 7 a.m. to 5 p.m. on weekdays. However, external demands for asphalt paving dictate production hours. For example, large paving jobs on busy highways may require production at night. There may also be an occasional need for production of asphalt at unusual times for emergency road repairs.

Compatibility with Properties, Uses, and Neighborhoods

The expected truck traffic volumes are directly compatible with the industrial and commercial uses that engage in manufacturing or vehicle operations within 2,000 feet of the APAC property.

The expected truck traffic volumes are not expected to impact residential areas in the vicinity because all traffic to and from the proposed plant will enter from and exit to US 441. Trucks conveying HMA or returning to obtain another load will be traveling to and from a paving project. There is no reason that truck traffic to and from the plant will pass through any residential areas in the vicinity of the plant.

Local, Regional, State, and Federal Limits

No local, state or federal limits on truck traffic volumes were identified. Highway level of service data for US 441 in the vicinity of the entrance to the proposed HMA plant is available from the North Central Florida Regional Planning Council. In this area, US 441 is a Class I Arterial with four lanes of traffic. The maximum service volume for the road is determined from the FDOT Generalized Tables of the O/LOS Handbook as 35,700 trips per day. The level of service (LOS) for this highway is B, with an annual average daily traffic (AADT) updated in November 2003 of 25,000, leaving an available service volume of 10,700.

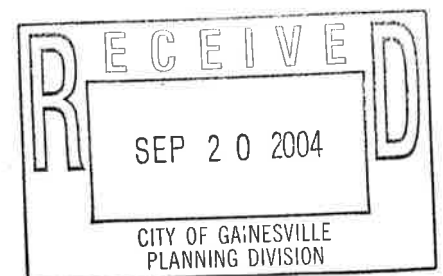
Asphalt Plant Model Number:

Dryer/Mixer: Astec RDB-9640 Double Barrel Drum

Air Filtering System: Astec RBH-68-16 68,195cfm Pulsejet Bag house with cyclone

1. The emissions are collected at various points, and flow through sealed ductwork to the point where the emissions are introduced to the burner. The fan discharge is introduced close to the burner, so the ductwork system acts as a vacuum. If seals were to leak, the vacuum will actually draw outside air into the system instead of forcing emissions out of the system.

Ralph: I will be available for any additional information: 904-591-1266





CONRAD YELVINGTON
DISTRIBUTORS, INC.

September 8, 2004

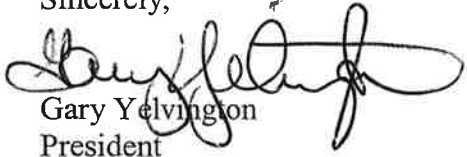
City of Gainesville
Attn. Carolyn Morgan
Dept. of Community Planning
PO box 490
Gainesville, FL 32601

Dear Carolyn;

Our terminal distribution center located at 7605 N. W. 13th Street, receives by rail, stores on site, and loads into trucks various rock, aggregate stone and sand products naturally removed from the earth. Delivery is primarily by rail. Removal is primarily by truck. The materials are handled, not processed (e.g. crushed) while on site. The Distribution Center intends to be, and is believed to be in conformance with the standards of performance described in the Code of Ordinances, City of Gainesville, Florida, Section 30-345, General performance Standards. The SIC code governing the distribution center is not required to obtain a special use permit.

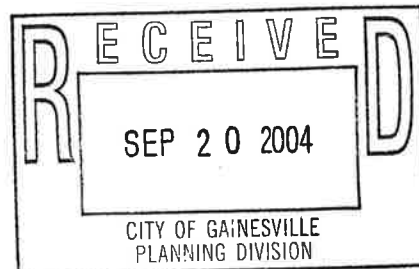
In addition, Conrad Yelvington Distributors intends to comply with the standards presently in place for a special use permit in the Tertiary Wellfield Protection Zone of the Murphree Wellfield. At the time the Terminal Distribution Center was permitted, it was not required to obtain a special use permit in the Tertiary Wellfield Protection Zone.

Sincerely,



Gary Yelvington
President

GY:km



Morgan, Carolyn R.

From: Sergio Reyes [SReyes@EngDenman.com]
Sent: Wednesday, September 22, 2004 2:10 PM
To: Agustin Olmos
Cc: Morgan, Carolyn R.
Subject: Re: FW: AC and Fuel Calc. Gainesville

Gus:

Apac decided that they are going to provide the fuel farm facility with roof as recommended by the County DEP and the city. Also, they will provide a fire suppressor system as required by code.

Sergio Reyes P. E.
Vice President
Eng Denman and Associates

SReyes@EngDenman.com
2404 NW 43rd Street
Gainesville, Fl 32606
352-373-3541

