FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Lindsay Precast, Inc.
13365 Southern PreCast Drive
Alachua, Florida 32615

Authorized Representative:
Ron Lindsay, Jr.-Vice President

Air Permit No. 0010064-008-AC
Permit Expires: xx/xx/xx

Lindsay Precast, Inc.
Minor Source Air Construction Permit
Polymer Concrete Casting Operation

This is the final air construction permit, which authorizes construction after-the-fact for Polymer Concrete Casting Operations. The proposed work will be conducted at the Lindsay Precast, Inc., which is a Concrete Batching Plant (Standard Industrial Classification No. 3272). The facility is located in Alachua County at 13365 Southern PreCast Drive in Alachua, Florida. The UTM coordinates are Zone 17, 359.0 km East, and 3295.7 km North.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

(DRAFT)

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Richard S. Rachal III, P.G.
Program Administrator
Waste and Air Resource Management Program

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on (DRAFT) to the persons listed below.

Mr. Ron Lindsay, Jr., Vice President-Lindsay Precast, Inc. (rlindsay@LindsayPrecast.com)
Veronica Sgro, Senior Engineer- Koogler & Associates (vsgro@kooglerassociates.com)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

(DRAFT)

_____ _____
(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Concrete Batch Plants Nos. 1, 2 & 3 each with two cement silos. The existing facility consists of the following emissions units.

Facility ID No. 0010064	
ID No.	**Emission Unit Description**
001	Pre-Cast Concrete Batch Plant with two cement silos, a weight hopper, and a mixer, which deposits concrete into molds. The maximum production rate is 12 cubic yards per hour.
002	Pre-Cast Concrete Batch Plant with two cement silos, a weight hopper, and a mixer, which deposits concrete into molds. The maximum production rate is 31.3 cubic yards per hour.
003	Pre-Cast Concrete Batch Plant with two cement silos, a weight hopper, and a mixer, which deposits concrete into molds. The maximum production rate is 60 cubic yards per hour.

Proposed Project

Facility requested a construction after-the-fact permit for a Polymer Concrete Casting Operations. This project will add the following emissions unit.

Facility ID No. 0010064	
ID No.	**Emission Unit Description**
005	Polymer Concrete Cast Operations

Polymer Concrete Casting Operations take place inside a building. Molds are prepared by waxing and placing fiberglass mats on cores and jackets. Resin, sand, rock, calcium carbonate, and pigment are stored in bags or totes prior to being mixed in a tank. The mixture is removed from the tank in batches. Catalyst is added to each batch and then mixed with a disperser. The catalyzed batch is then poured into the prepared fiberglass mold set. Once the batch is set, the product is removed from the mold. The polymer concrete product's edges are ground smooth by hand or by an occasional electric grinder and the minor particulate matter is sweep up daily. The product is then palletized and placed in the yard.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Northeast District, Florida Department of Environmental Protection (Department). The compliance authority for this project is the Northeast District Compliance Assurance, Florida Department of Environmental Protection. The Northeast District's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256-7590. The Northeast District's telephone number is (904) 256-1700. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District. All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Department. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office. The Permitting Authority's telephone number is 904/256-1700.

3. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Application for Non Title V Permit: This permit authorizes construction of the permitted emission unit and initial operation to determine compliance with Department rules. A Non Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Non Title V air operation permit at least 90 days prior to expiration of this permit. To apply for a Non Title V air operation permit, the applicant shall submit the appropriate application form, required compliance test results, appropriate application fees and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority. [Rules 62-4.030, and 62-4.050, F.A.C.]

A. EU004 Polymer Concrete Casting Operation

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
005	Polymer Concrete Cast Operation

Polymer Concrete Casting Operations take place inside a building. Molds are prepared by waxing and placing fiberglass mats on cores and jackets. Resin, sand, rock, calcium carbonate, and pigment are stored in bags or totes prior to being mixed in a tank. The mixture is removed from the tank in batches. Catalyst is added to each batch and then mixed with a disperser. The catalyzed batch is then poured into the prepared fiberglass mold set. Once the batch is set, the product is removed from the mold. The polymer concrete product's edges are ground smooth by hand or by an occasional electric grinder and the minor particulate matter is sweep up daily. The product is then palletized and placed in the yard.

For informational purposes, the Total HAP (Styrene) potentials to emit were estimated to be below 5 TPY.

[Determination information submitted April 30, 2013 and Rule 62-210.(PTE), F.A.C.]

EQUIPMENT

1. **Equipment Name**. The permittee is authorized to install a Polymer Concrete Cast Operation after the fact.

   [Application No. 0010064-008-AC]

PERFORMANCE RESTRICTIONS

2. **Permitted Capacity**. The resin maximum annual process rate shall not exceed 1,500 tons per year of mix.

   [Rule 62-210.200(PTE), F.A.C., and Application No. 0010064-008-AC]

3. **Restricted Operation**. The hours of operation of are not limited (8760 hours per year/ 8784 hours in a leap year).

   [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

4. **Emissions Standards**.

   Visible Emissions: No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity).

   [Rules 62-4.070(3), and Rule 62-296.320(4)(b) F.A.C].

5. Unconfined Particulate Emissions.

1. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.
2. Any permit issued to a facility with emissions of unconfined particulate matter shall specify the reasonable precautions to be taken by that facility to control the emissions of unconfined particulate matter.
3. Reasonable precautions include the following:
   a. Paving and maintenance of roads, parking areas and yards.
   b. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
   c. Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
   d. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
   e. Landscaping or planting of vegetation.
   f. Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
   g. Confining abrasive blasting where possible.
   h. Enclosure or covering of conveyor systems.
4. In determining what constitutes reasonable precautions for a particular facility, the Department shall consider the cost of the control technique or work practice, the environmental impacts of the technique or practice, and the degree of reduction of emissions expected from a particular technique or practice.

[Rule 62-296.320(4)(c), F.A.C.]

TESTING REQUIREMENTS

6. Visible Emissions. The permittee shall conduct a visible emissions compliance test upon request by the Department in accordance with the requirements of Rule 62-297.310(7)(b), F.A.C. The test Method shall be EPA Method 9 incorporated and adopted by reference in Chapter 62-297, F.A.C.

[Rule 62-4.070, F.A.C.]

7. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.

[Rule 62-297.310(7), F.A.C.]

RECORDS AND REPORTS

8. **Test Reports.** The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. For each test run, the report shall also indicate the maximum process rate.

[Rule 62-297.310(8), F.A.C.]

9. **Monthly Recordkeeping (resin usage)**. In order to demonstrate compliance with **Specific Condition No. 2**, the owner or operator shall maintain a log of resin usage based on a consecutive twelve month total. These records shall be retained for five years and made available to Departmental inspectors upon request. Logs must document the method, calculations, and formulas used in determining the usage rate and the emission rate. This includes, but is not limited to, the product name, density, individual and total HAP contents, and individual and total VOC content. All calculations, including those used to derive emission credits for mass balance must be based off emission factors presented in the permitting application or supporting documents, must be clearly documented, and may be presented **in the form of a template of sample calculations**, which is filed with the logs required in this condition and available for review on site by regulatory inspectors. At a minimum the log shall contain:

Monthly

- Facility Name, Facility ID No. (i.e., Lindsay Precast, Inc., 0010064);
- Designation of month and year of operation for which records are being tabulated;
- Consecutive 12 month total of individual and combined HAP/VOC emissions in tons;
- Consecutive 12 month total of resin usage in tons;
- The VOC/HAP content of each gel-coats, resins, and other VOC/HAP containing materials;
- Consecutive 12 month total of wax usage in tons.

The monthly logs shall be completed by the end of the following month.

Note: A consecutive twelve month total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive twelve month total treats each month of the year as the end of a 12-month period. A twelve month total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 month totals using whatever number of months of data are available until such a time as a consecutive 12 month total can be maintained each month.

[Rule 62-4.070(3), F.A.C.]

10. This facility is subject to the requirements of the attached Combined Appendices A-D.

11. This facility is subject to the requirements of the SECTION 2. Administrative Requirements on page four of this permit.