Title V Air Operation Permit Renewal
Permit No. 0070001-008-AV

APPLICANT

The applicant for this project is E.I. Dupont De Nemours & Co., E.I. Dupont De Nemours & Co. Highland. The applicant's responsible official and mailing address are: Mr. Mr. Clement J. Hilton, Plant Manager, E.I. Dupont De Nemours & Co. Highland Facility, P.O. Box 753, Starke Fl., 32091.

FACILITY DESCRIPTION

This facility mines and processes heavy mineral sand (Ilmenite, Zircon, Staurolite) for processing to titanium dioxide.

The facility contains a fuel oil fired Ilmenite rotary dryer with a maximum process rate of 76.16 tons per hour of dry mineral sand and a maximum heat input rate of 22.0 MMBtu per hour. Heat is provided by the burning of either No. 6 fuel oil, On-spec used oil, No. 4 fuel oil or No. 5 fuel oil. A dry cyclone for product recovery with exhaust gases emitted through a single vertical stack; various screens, bucket elevators, storage bins, belt conveyors, and a loading station a feed system, and a load-out system; a portable McCloskey International, Model: MCB-516RE screening system and a Caterpillar (95 KW, 2200 rpm) non road diesel engine, feed hopper, screener and multiple conveyor belts. The screener is used to reclaim metallic minerals from previously processed material.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permit is to renew Title V Air Operation Permit No. 0070001-007-AV for the continued operation of the existing E.I. Dupont De Nemours Co. Metallic Mineral Processing Facility in Bradford County.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Renewal received March 25, 2014
Notice of Intent to Issue Air Permit issued April 04, 2014
Public Notice Published xx/xx/2014

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C. due to the potential SO_2 emissions being above 250 TPY

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

The Processing Plant operates various sources of NSPS fugitive emissions at a rate necessary to maintain a maximum production rate of 76.16 tons per hour of dried Ilmenite ore.
The Product Handling and Transfer Operations - Fugitive Emissions (E.U. 002) and the Portable Screening System (E.U. 003) are regulated under NSPS - 40 CFR 60, Subpart LL, Standards of Performance for Metallic Mineral Processing Plants, adopted and incorporated by reference in Rule 62-204.800, F.A.C.

The Internal Combustion Engine, EU 004 for E.U. 003 is subject to the requirements of 40 CFR part 60 subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 60, Subpart A, General Provisions This diesel engine is classified as new, stationary compression ignition (CI) internal combustion engine (ICE) and is required to comply with the requirements of requirements of 40 CFR 60 Subpart IIII.

NESHAP

The Internal Combustion Engine, EU 004 for E.U. 003 is classified as new stationary RICE by 40 CFR 63.6590(a)(2)(iii) of Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion manufactured after June 12, 2006 with an engine displacement of less than 30 liters per cylinder located at an area source of HAP emissions. In accordance with 40 CFR 63.6590(c)(1) this engine must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines .

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) does not apply to any Emissions Unit at this facility

GHG: Based on the Greenhouse Gases Emissions Report submitted by the facility dated April 3rd, 2014, the facility total estimated CO_2e emissions are less than 25,000 metric tons. If the facility's potential to emit GHG is greater than 100,000 TPY of CO_2e emissions, then the facility is classified as a major source of Greenhouse Gases based on EPA's 2010 Gas Tailoring Rule.

PROJECT REVIEW

Below is a brief description of any changes that were made as part of this renewal

1. Update of the Appendices to reflect the current Title V permit format (Appendix TV-6 is replaced with Appendix TV- Title V General Conditions, Appendices RR- Facility-wide Reporting Requirements, TR- Facility-wide Testing Requirements have been added);

2. Revision to the Annual Operation Report, Annual Emissions Fee Form and Fee Facility-Wide Conditions to reflect the changes to the statutes that went into effect for 2014.

3. Revision of the Prevention of Accidental Releases Facility-wide condition to reflect the correct reporting agency,

TITLE V PERMIT FORMAT CHANGES:

- Appendix TV-6 is replaced with Appendix TV- Title V General Conditions
- Appendix RR- Facility-wide Reporting Requirements is added
- Appendix TR- Facility-wide Testing Requirements is added
- The Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide conditions are replaced as follows:

FW6 Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013).

> *{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}*

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

- The Prevention of Accidental Releases (Section 112(r) of CAA) Facility-Wide Condition is replaced as follows:

FW8. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

CONCLUSION

This project renews Title V air operation permit No. 0070001-007-AV. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.