December 29, 2014

CERTIFIED MAIL: 7013 3020 0001 2745 5293
RETURN RECEIPT REQUESTED

PERMITTEE

Titan Florida, LLC.
11000 NW 121 Way
Medley, FL 33178

Authorized Representative:
Mr. Marco Burgoa, Plant Manager Pennsuco Cement

Air Permit No. 0250020-037-AC
Permit Expires: December 28, 2015

Titan Florida, LLC.
Minor Source Air Construction Permit
Installation of a Dust Shuttling System

This is the final air construction permit No. 0250020-037-AC, which authorizes the installation of a dust shuttling system. The proposed work will be conducted at the Titan Florida, LLC. facility which engages in the production of aggregate, cement, concrete blocks, and ready mix concrete (Standard Industrial Classification Nos. 3241, 3271, and 3273). The facility is located in Miami-Dade County at 11000 NW 121 Way, Medley, Florida 33178. The UTM coordinates are Zone 17, 562.8 km East, and 2861.7 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 the 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 Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management.

Executed in Miami-Dade County, Florida

_____ _____

H. Patrick Wong, Chief (Date)
Air Quality Management

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 certified U.S. mail and/or 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 _____ to the persons listed below.

Marco Burgoa, Plant Manager Pennsuco Cement, Titan Florida, LLC. [mburgoa@titanamerica.com]

Muhammad Khan, Area Manager, Titan Florida, LLC. [mkhan@titanamerica.com]

Michael Ballanger, P.E., Trinity Consultants [MBALLENGER@TRINITYCONSULTANTS.COM]

David Read, P.E., Florida Department of Environmental Protection [David.Read@dep.state.fl.us]

Diane Pupa, Florida Department of Environmental Protection, Southeast District Office [Diane.Pupa@dep.state.fl.us]

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.

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

Titan Florida, LLC. engages in the production of aggregate, cement, concrete blocks, and ready-mix concrete. The existing facility consists of the following emissions units.

Facility ID No. 0250020

ID No.	Emission Unit Description
010	Finish Mill System: Finish Mill No. 1
011	Finish Mill System: Finish Mill No. 2
012	Finish Mill System: Finish Mill No. 3
013	Finish Mill System: Finish Mill No. 4
030	Finish Mill System: Finish Mill No. 6
014	Cement Handling System: Cement Storage Silos 1 through 12
015	Cement Handling System: Cement Distribution, Rail and Truck Loadout/Mobile Cementitious Material Sack Loadout System
016	Cement Handling System: Cement Packhouse
022	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant Subject to 40 CFR 60, Subpart OOO
023	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant NOT Subject to 40 CFR 60, Subpart OOO
024	Concrete Block Plant
025	Two Concrete Batch Ready Mix Plants
026	Coal Handling System
027	Clinker Handling and Storage System
028	Pyroprocessing/Raw Mill System
029	Raw Material Handling System
031	Unregulated Emissions Units and/or Activities: Fugitive Emissions
032	Cementious Sack Loadout System
034	Transloading of Cementious Material
036	Emergency Diesel Fuel Fired Air Compressor

038	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 63, Subpart ZZZZ
039	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 60, Subpart IIII

Proposed Project

Titan Florida, LLC. proposes to install a dust shuttling system to the raw mill and pyroprocessing system. Titan Florida, LLC. is proposing two emission points; One (1) surge hopper with an associated 400 scfm cartridge filter, and one (1) 300 ton dust storage bin with an associated 3,000 scfm bin vent filter. Cement kiln dust (CKD) captured from the main baghouse may be fed, by a conveyor, into the surge hopper. CKD exiting the surge hopper will then be transported by a pneumatic conveyor to the 300 ton dust storage bin. From the proposed storage bin, the CKD will become a component of the finished cement product or alternatively shipped off-site.

This project will modify the following emissions unit.

Facility ID No. 0250020	
ID No.	**Emission Unit Description**
028	Pyroprocessing/Raw Mill System

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. The RER's mailing address is: 701 NW 1 Court, Suite 400, Miami, Florida 33136. The RER's telephone number is 305/372-6925. All documents related to applications for permits to operate an emissions unit shall be submitted to the RER, Division of Environmental Resources Management, Air Quality Management.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the RER, Division of Environmental Resources Management, Air Quality Management. The mailing address of the RER, Division of Environmental Resources Management, Air Quality Management is: 701 NW 1 Court, Suite 400, Miami, Florida 33136. The RER, Division of Environmental Resources Management, Air Quality Management's telephone number is 305/372-6925.

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;
   d. Appendix D. Common Testing Requirements. (If applicable);

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, and Chapter 24, Code of Miami-Dade County. 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 RER or Florida Department of Environmental Protection (FDEP) may require the permittee to conform to new or additional conditions. The RER or FDEP shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the RER or FDEP may grant additional time.
   [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the RER 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 RER. 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. Source Obligation:
   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

(b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
[Rule 62-212.400(12), F.A.C.]

8. Application for Title V Air Operation Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with the FDEP and Miami Dade County rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V air operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the RER may by law require. The application shall be submitted to the RER.
[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

9. Extension of This Permit: The expiration date of this construction permit may be extended upon request of the owner or operator and submission of the appropriate fee to the Miami-Dade County Department of Regulatory and Economic Resources, Division of Environmental Resources Management, Air Quality Management **at least 60 days prior** to the expiration date of this permit.
[Rule 62-4.030, 62-4.050, 62-4.070(3), and 62-4.220 F.A.C.]

10. Annual Operating Report Required: The Annual Operating Report (DEP Form No. 62-210.900(5)) shall be completed each year and submitted to the Miami Dade County, RER, Air Quality Management or submitted electronically to the FDEP by April 1 of the following year.
[Rule 62-210.370(3) F.A.C.]

11. Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.

This subsection of the permit addresses the following emissions unit.

ARMS Emissions Unit No.	Brief Description of Emissions Unit
028	Cement Plant Pyroprocessing and Raw Mill System

The dust shuttling system is controlled by the following baghouses:

Emission Point	Descriptions of Emissions Point
Baghouse I.D: 361.DC220	Cartridge filter for dust shuttling system for surge hopper *(New)*
Baghouse I.D: 361.DC310	Dust shuttling system dust collector for dust storage bin *(New)*

EQUIPMENT

1. Equipment: The permittee is authorized to install equipment necessary for a dust shuttling system. The equipment includes one (1) 300 ton dust storage bin with a 3,000 scfm bin vent filter, one (1) surge hopper with a 400 scfm cartridge filter, automatic shutoff gates, conveyors, conveyor outlets, rotary airlock, and a belt feeder.
   [Application No. 0250020-037-AC]

PERFORMANCE RESTRICTIONS AND EMISSIONS STANDARDS

2. Rule Applicability: This emissions unit shall comply with all the applicable requirements contained in 40 CFR 63 Subpart LLL – National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry, and 40 CFR 63 Subpart A – General Provisions.
   [40 CFR 63.1340]

3. Hours of Operation: This emissions unit system is allowed to operate 8,760 hours per year.
   [Rule 62-210.200(PTE), F.A.C.]

4. Emissions limits for affected sources other than kilns; clinker coolers; new and reconstructed raw material dryers. The owner or operator of each new or existing raw material, clinker, or finished product storage bin; conveying system transfer point; bagging system; and bulk loading or unloading system; raw and finish mills, and each existing raw material dryer, at a facility which is a major source subject to the provisions of 40 CFR 63 Subpart LLL must not cause to be discharged any gases from these affected sources which exhibit opacity in excess of 10 percent.
   [40 CFR 63.1345]

COMPLIANCE REQUIREMENTS

5. a) Initial Compliance Requirements: The permittee must demonstrate initial compliance with the emissions standards and operating limits by using the test methods and procedures in 40 CFR 63.1349 and 40 CFR 63.7.
   b) Opacity Compliance: The permittee must demonstrate initial compliance with the opacity emissions standards by using the performance test methods and procedures in 40 CFR 63.1349(b)(2). Use the maximum 6-minute average opacity exhibited during the performance test period to determine whether the affected source is in initial compliance with the standard.
   [40 CFR 63.1348(a)(2)]

6. Opacity Monitoring Requirements: For new affected emissions sources subject to 40 CFR 63 Subpart LLL, this condition shall apply immediately upon startup. The permittee must conduct required emissions monitoring in accordance with the provisions of paragraphs (f)(1)(i) through (f)(1)(vii) of 40 CFR 63.1350 below, and in accordance with the operation and maintenance plan developed in accordance with 40 CFR 63.1347.
   (i) The owner or operator must conduct a monthly **10-minute** visible emissions test of each affected source in accordance with Method 22 of Appendix A-7 to 40 CFR 60. The performance test must be conducted while the affected source is in operation.
   (ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of performance testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the owner or operator must resume performance testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
   (iii) If no visible emissions are observed during the semi-annual test for any affected source, the owner or operator may decrease the frequency of performance testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual performance test, the owner or operator must resume performance testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
   (iv) If visible emissions are observed during any Method 22 performance test, of Appendix A-7 to 40 CFR 60, the owner or operator must conduct **30 minutes** of opacity observations, recorded at 15-second intervals, in accordance with Method 9 of Appendix A-4 to 40 CFR 60. The Method 9 performance test, of Appendix A-4 to 40 CFR 60, must begin within 1 hour of any observation of visible emissions.
   (v) Any totally enclosed conveying system transfer point, regardless of the location of the transfer point is not required to conduct Method 22 visible emissions monitoring under this paragraph. The enclosures for these transfer points must be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.
   (vi) If any partially enclosed or unenclosed conveying system transfer point is located in a building, you must have the option to conduct a Method 22 performance test, of appendix A–7 to 40 CFR, according to the requirements of paragraphs (f)(1)(i) through (f)(1)(iv) of 40 CFR 63.1350 for each such conveying system transfer point located within the building, or for the building itself, according to paragraph (f)(1)(vii) of 40 CFR 63.1350.
   (vii) If visible emissions from a building are monitored, the requirements of paragraphs (f)(1)(i) through (f)(1)(iv) of 40 CFR 63.1350 apply to the monitoring of the building, and you must also test visible emissions from each side, roof, and vent of the building for at least **10 minutes**.
   [40 CFR 63.1350(f)(1)(i)-(f)(1)(vii)]

PERFORMANCE TEST AND REPORTING REQUIREMENTS

7. Performance Test Results: Performance test results must be documented in complete test reports that contain the information required by paragraphs (a)(1) through (a)(10) of 40 CFR 63.1349, as well as all other relevant information. As described in 40 CFR 63.7(c)(2)(i), the site-specific plan to be followed during performance testing must be made available to the Administrator prior to testing, if requested.
   (1) A brief description of the process and the air pollution control system;
   (2) Sampling location description(s);
   (3) A description of sampling and analytical procedures and any modifications to standard procedures;
   (4) Test results;
   (5) Quality assurance procedures and results;

(6) Records of operating conditions during the performance test, preparation of standards, and calibration procedures;
(7) Raw data sheets for field sampling and field and laboratory analyses;
(8) Documentation of calculations;
(9) All data recorded and used to establish parameters for monitoring; and
(10) Any other information required by the performance test method.
[40 CFR 63.1349(a)]

8. Opacity Tests: The permittee must conduct opacity tests in accordance with Method 9 of appendix A–4 to 40 CFR 60. The duration of the Method 9 performance test must be 3 hours (30 6-minute averages), except that the duration of the Method 9 performance test may be reduced to 1 hour if the conditions of paragraphs (i) through (ii) of this condition apply. For batch processes that are not run for 3-hour periods or longer, compile observations totaling 3 hours when the unit is operating.
(i) There are no individual readings greater than 10 percent opacity;
(ii) There are no more than three readings of 10 percent for the first 1-hour period.
[40 CFR 63.1349(b)(2)]

9. Report Submittal: As of December 31, 2011 and within 60 days after the date of completing each performance evaluation or test, as defined in 40 CFR 63.2, conducted to demonstrate compliance with any standard covered by 40 CFR 63 Subpart LLL, the permittee must submit the relative accuracy test audit data and performance test data, except opacity data, to the EPA by successfully submitting the data electronically to the EPA's Central Data Exchange (CDX) by using the Electronic Reporting Tool (ERT) (see *http://www.epa.gov/ttn/chief/ert/ert_tool.html/*).
[40 CFR 63.1349(d)(2)]