Florida Department of Environmental Protection
Northeast District
7777 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE:

TAMKO Building Products, Inc.
914 Hall Park Road
Green Cove Springs, Florida 32043

Air Permit Number: 0190019-032-AC
Date of Issue: DRAFT (Revised)
Expiration Date:
TAMKO Building Products
Air Construction Permit

Authorized Representative:
John Cannon, General Manufacturing Manager

This is the final air construction permit, which authorizes: 1) - Revisions to the silo loading rates for EU 001, EP Nos. 11 and 14 and updating the maximum air flow rate for the baghouse controlling EU 001, EP 13. 2) Changes to EU 001, EP 12 (Asphalt Coater, No. 9A Surge Tank and Mixer) including replacement of the existing fume hood over the coater 3) Replacement of an existing tarpaulin cover frame that currently acts as a capture hood over the Wet Looper Pull Rolls with a more durable frame and sheet metal structure of similar shape. 4) Installation of vertical panels (some are sliding panels) around the slate application area to improve operational efficiency and improve dust capture 5) Installation of vertical panels (some are sliding panels) around the sand application area to improve operational efficiency and improve dust capture.

The proposed work will be conducted at 914 Hall Park Road in the City of Green Cove Springs, Clay County, FL. The Standard Industrial Classification No. is 2952 for Asphalt Roofing Manufacturing Facility. The UTM coordinates are Zone 17, 435.2 km East; and 3316.8 km N.

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

Khalid Al-Nahdy, P.E.
District Air Program Administrator

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)

KAA: jw

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The Asphalt Processing/Roofing Manufacturing Facility consist of an Asphalt Roofing Line, (EU 001) that produces asphalt shingles, mineral surfaced roll roofing and saturated felt (smooth surface roll roofing); and six heaters/burners (EU 004) that may be fueled with No. 2 fuel oil, LPG, or Natural Gas.

Asphalt roofing production includes the coating of fiberglass or organic mats with asphalt, the addition of minerals to the front and rear surface of the coated mats, cooling and drying of the nearly finished products, and product finishing and packing.

Base fiberglass/organic mat is unrolled from the unwind stand on to the dry looper which maintains a constant tension on the mat. When organic mat is used the mat goes to the saturator to be saturated with asphalt. As the mat substrate (fiberglass/organic) passes through the coater, filled asphalt coating at about 355°F-425°F is released through a valve onto the mat. Squeeze rollers in the coater apply filled coating to the front and back of the mat distributing it evenly to form a thick base coating to which surface materials will adhere. After leaving the coater, the coated material is passed through a surfacing applicator where surfacing materials are fed onto the hot coated surface. The surfacing materials are then pressed into the coatings as the mat passes through an S-drum where it is reversed, exposing the bottom side. Next, backing materials are applied to the back surface and pressed into the mat. After surfacing, the mat is cooled rapidly by water-cooled rolls and/or water sprays and passed through air pressure-operated press rolls used to embed the surface materials firmly onto the filled coating. The mat then passes through a drying section where it is air dried. A finish looper in the line allows a continuous movement of the sheet through the preceding operations and serves to further cool and dry the roofing sheets.

Solvent and water based paints are used to paint lines on the finished roll roofing products. Roll roofing then moves to a winder where rolls are formed. Shingles are passed through a cutter. The finished shingles and rolls are then stacked and packaged for shipment.

The existing facility consists of the following emissions units and points.

Facility ID No. 00190019	
ID No.	Emission Unit Description
001	Asphalt Roofing Line

Emissions Point	Description	Throughput Rate
EP-1 (EP1-S)	Saturator & Wet Looper controlled by CVM 90-CTR-12 filter	30.0 TPH production rate (1)(2) 15.0 TPH production rate (1)(3)
EP-2 (EP2)	Saturator capture system	
EP-3 (EP3-S)	Heavy Saturant Storage Tank (Tank #3) & Truck Unloading & Interplant Transfer with a CECO Model TVF-10 filter	400 GPM transfer rate
EP-4 (EP4-S)	Saturant Storage Tank (Tank #4) & Truck Unloading & Interplant Transfer with a CECO Model TV-10 filter	400GPM transfer rate
EP-5 (EP5-S)	Saturant Run Tank (Tank #5) & Truck Unloading & Interplant Transfer with a fume filter	400 GPM transfer rate
EP-7 (EP7-S)	Asphalt Coating Tank (Tank #1) & Truck Unloading controlled by a CECO Model TVF-10 filter	400 GPM transfer rate
EP-8 (EP8-S)	Asphalt Coating Run / Storage Tank (Tank # 2) & Truck Unloading controlled by a CECO Model TVF-10 filter	400 GPM transfer rate
EP-11 (EP11-S)	Limestone Silo (Tank #21) & Truck Unloading controlled by a Pneumafil Model PCFH-8 filter	25 TPH silo loading rate
EP-12 (EP12-S)	Coater, #9A Surge Tank & #9B Mixer with common filter (CECO CS-16A10-EA)	
EP-13 (EP13-S)	#10 Mineral Application Section controlled by a Pneumafil Model PCFH-48 filter	30 TPH production rate
EP-14 (EP14-S)	Mineral Silo (Tank #20) & Truck Unloading controlled by a Pneumafil Model PCFH-8	25 TPH silo loading rate
EP-15 (EP15)	Limestone Surge Tank controlled by MAC Equipment 72-AVR21 filter, outdoor exhaust	
EP-16 (EP16)	Mineral Surge Tank controlled by MAC Equipment 54-AVR14 filter, outdoor exhaust	
No. 17 (EP 17)	Granule/Sand Storage Silos (Tanks #22-26) controlled by Bin Vent Filter	4

EP-18 (EP18)	Truck unloading controlled by portable dust collector	30 Tons/hr
EP-19 (EP19)	Rail unloading	40 Tons/hr
EP-20 (EP20)	Transfer point between conveyor 1 and 2	[4]___
EP-21 (EP21)	Transfer point from conveyor 2 to elevator	[4]___

ID No.	Emission Unit Description	
004	BURNERS/HEATER	
BURNERS/HEATER	FUEL OPTIONS	SULFUR CONTENT
No. 1 Coating Storage Heater	No. 2 fuel oil/ or LPG/ or Natural gas	≤ 0.5% by weight
No. 2 Coating Run Tank Heater	No. 2 fuel oil/ or LPG/ or Natural gas	≤ 0.5% by weight
No. 3 Saturant Storage Heater	No. 2 fuel oil/ or LPG/ or Natural gas	≤ 0.5% by weight
No. 4 Saturant Storage Heater	No. 2 fuel oil/ or LPG/ or Natural gas	≤ 0.5% by weight
Saturant Preheater	No. 2 fuel oil/ or LPG/ or Natural gas	≤ 0.5% by weight
Coating Mixer Tank Heater	No. 2 fuel oil/ or LPG/ or Natural gas	≤ 0.5% by weight

(1) 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.
(2) Applicable when producing asphalt shingles or mineral-surfaced roll roofing.
(3) Applicable when producing saturated felt or smooth-surfaced roll roofing.
(4) Based on Rail unloading rate
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C]

Proposed Project Description

The applicant applied for an air construction permit on June 11, 2012 and submitted supplemental information (received June 20, 2012) to the application requesting 1) - Revisions to the silo loading rates for EU 001, EP Nos. 11 and 14 and updating the maximum air flow rate for the baghouse controlling EU 001, EP 13. 2) Changes to EU 001, EP 12 (Asphalt Coater, No. 9A Surge Tank and Mixer) including replacement of the existing fume hood over the coater 3) Replacement of an existing tarpaulin cover frame that currently acts as a capture hood over the Wet Looper Pull Rolls with a more durable frame and sheet metal structure of similar shape. 4) Installation of vertical panels (some are sliding panels) around the slate application area to improve operational efficiency and improve dust capture 5) Installation of vertical panels (some are sliding panels) around the sand application area to improve operational efficiency and improve dust capture.

The following table summarizes the existing and new silo loading rates, baghouse air flow rate, and corrected PM emission limits for EU 001, EP 11, EP 13, and EP 14 as requested by the applicant.

EU 001.	Asphalt Roofing Line		
Em. Pts.	Description	Existing Rate	Proposed Rate

EP-11	Limestone Silo (Tank #20) & Truck Unloading controlled by Pneumafil Model PCFH-8 filter	25 TPH	[1]---
EP-14	Mineral Silo (Tank #20) & Truck Unloading controlled by Pneumafil Model PCFH-8 filter	25 TPH	[1]---
EP-13	#10 Mineral Application Section controlled by a Pneumafil Model PCFH-48 filter	4000 CFM	10,000 CFM

(1) Not rate limited, estimated maximum loading rate is 30 TPH

FACILITY REGULATORY CLASSIFICATION

- The facility is not 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 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.

1. Permitting Authority: The permitting authority for this project is the Northeast District Air Program, Florida Department of Environmental Protection (Department). The Northeast District's mailing address is 7777 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.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the North East District Office. The mailing address and phone number of the District Office is: 7777 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. 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.
   e. Appendix E. Subpart A of NSPS – General Provision.

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. 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.
   [Rule 62-212.400(12), F.A.C.]

8. Application for Non - Title V Permit: This permit authorizes construction of the permitted emissions unit and initial operation to determine compliance with Department rules. A completed Application for Air Permit - Non Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 90 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit. [Rules 62-4.055 and 62-4.220, F.A.C.]

The following specific conditions apply to the Emissions Units listed below:

EU No.	Emission Unit Description
001	No. 1 Asphalt Roofing Line

ESSENTIAL POTENTIAL TO EMIT (PTE) PARAMETERS

1. Hours of Operation: The hours of operation are not restricted, i.e. 24 H/D; 7 D/W; 52 W/Y, and 8760 hours per year.

   [Rules 62-4.160(2), F.A.C., and Rule 62-210.200(PTE), F.A.C., Definitions- Potential to Emit (PTE)]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: The maximum operating rates are listed below and shall not be exceeded without prior Department approval.

EU (Emission Unit) 001 - No. 1 Asphalt Roofing Line:

Emissions Point	Description	Throughput Rate
EP-1 (EP1-S)	Saturator & Wet Looper controlled by CVM 90-CTR-12 filter	30.0 TPH production rate (1)(2) 15.0 TPH production rate (1)(3)
EP-2 (EP2)	Saturator capture system	
EP-3 (EP3-S)	Heavy Saturant Storage Tank (Tank # 3) & Truck Unloading & Interplant Transfer with a CECO Model TVF-10 filter	400 GPM transfer rate
EP-4 (EP4-S)	Saturant Storage Tank (Tank # 4) & Truck Unloading & Interplant Transfer with a CECO Model TV-10 filter	400 GPM transfer rate
EP-5 (EP5-S)	Saturant Run Tank (Tank # 5) & Truck Unloading & Interplant Transfer with a fume filter	400 GPM transfer rate
EP-7 (EP7-S)	Asphalt Coating Tank (Tank # 1) & Truck Unloading controlled by a CECO Model TVF-10 filter	400 GPM transfer rate
EP-8 (EP8-S)	Asphalt Coating Run / Storage Tank (Tank # 2) & Truck Unloading controlled by a CECO Model TVF-10 filter	400 GPM transfer rate
EP-11 (EP11-S)	Limestone Silo (Tank # 21) & Truck Unloading controlled by a Pneumafil Model PCFH-8 filter	~~25 TPH silo loading rate~~ 4

EP-12 (EP12-S)	Coater, # 9A Surge Tank & # 9B Mixer with common filter (CECO CS-16A10-EA)	
EP-13 (EP13-S)	# 10 Mineral Application Section controlled by a Pneumafil Model PCFH-48 filter	30 TPH production rate
EP-14 (EP14-S)	Mineral Silo (Tank # 20) & Truck Unloading controlled by a Pneumafil Model PCFH-8	~~25 TPH silo loading rate~~ [4]
EP-15 (EP15)	Limestone Surge Tank controlled by MAC Equipment 72-AVR21 filter, outdoor exhaust	
EP-16 (EP16)	Mineral Surge Tank controlled by MAC Equipment 54-AVR14 filter, outdoor exhaust	
No. 17 (EP 17)	Granule/Sand Storage Silos (Tanks # 22-26) controlled by Bin Vent Filter	[5]
EP-18 (EP18)	Truck unloading controlled by portable dust collector	30 Tons/hr
EP-19 (EP19)	Rail unloading	40 Tons/hr
EP-20 (EP20)	Transfer point between conveyor 1 and 2	[5]
EP-21 (EP21)	Transfer point from conveyor 2 to elevator	[5]

(1) 24-hr average and shall not be exceeded by more than 10% for any 1-hr average.
(2) Applicable when producing mineral-surfaced roll roofing.
(3) Applicable when producing saturated felt or smooth-surfaced roll roofing.
(4) Not rate limited, estimated maximum loading rate is 30 TPH
(5) Based on Rail unloading rate
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

3. Maximum Allowable Emissions Rates: The permitted maximum allowable emissions rates for each pollutant are as follows:

EU	EMISSION POINTS	POLLUTANT	EMISSION RATE	RULE
001	EP1-S	Particulate Matter	0.04 kg/Mg (0.08 lb/ton); 2.40 lbs/hr and 10.5 TPY (1) (2) 0.4 kg/Mg (0.8 lb/ton; 12.00 lbs/hr and 52.56 TPY (1) (3)	40 CFR 60.472(a)(1)(i) 40 CFR 60.472(a)(1)(ii)
	EP1-S	Visible Emissions	Not more than 20% Opacity (4)	40 CFR 60.472(a)(2)
	EP2	Visible Emissions	Not more than 20% of any period of consecutive valid observations totaling 60 minutes	40 CFR 60.472(a)(3)
	EP3-S,- EP5-S EP7-S, EP8-S	Visible Emissions	Not more than 0% opacity except for one consecutive 15-minute period in any 24 hours when clearing lines	40 CFR 60.472(c)
	EP11-S	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP12-S	Particulate Matter	0.04 kg/Mg (0.08 lb/ton) (5)	40 CFR 60.472(a)(1)(i)
	EP12-S	Visible Emissions	Not more than 20% Opacity	40 CFR 60.472(a)(2)
	EP13-S	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP14-S	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP15, EP16	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP17	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP18	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP19	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP20	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)
	EP21	Visible Emissions	Not more than 1% opacity	40 CFR 60.472(d)

(1) The averaging time for this condition is based on the run time of the specified test method.
(2) Applicable when producing mineral-surfaced roll roofing.
(3) Applicable when producing saturated felt or smooth-surfaced roll roofing.
(4) Applicable to each production mode.
(5) PM from the coater EP 12-S shall be tested and the emissions shall be added to the results of the mineral roll PM test to determine compliance with 40 CFR 60.472(a)(1)(i).

4. Emissions Control: Emissions control measures shall be maintained in good operating condition and shall remain in place at all times during operation. If there is a malfunction on the control unit, the owner or operator shall immediately take corrective actions to minimize emissions.

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

5. Emissions Control Storage Tank(s): Control device shall not be bypassed when transfer lines are being blown for clearing.

   [40 CFR 60.472(c) NSPS]

TESTING REQUIREMENTS

6. Saturators: The owner or operator shall conduct performance tests required in § 60.8 as follows:

   (1) When the final product is mineral-surfaced roll roofing, the annual particulate matter compliance test shall be conducted while manufacturing the product that generates the greatest PM emissions to the control device inlet.

   (2) When the final product is saturated felt or smooth-surfaced roll roofing, the tests shall be conducted while 6.8-kg (15-lb) felt is being produced.

   [40 CFR 60.474(a) NSPS and Rule 62-4.070(3), F.A.C.]

7. Temperature During Performance Test: The owner or operator shall use the monitoring device in Specific Condition No. 12 to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results.

   [40 CFR 60.474(e) NSPS]

8. EPA Method 9 - Required Sampling Time: The required minimum period of observation for each compliance test shall be thirty (30) minutes. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

   [Rule 62-297.310(4)(a)2., F.A.C.]

9. EPA Method 22 - Required Sampling Time: Method 22, shall be modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with § 60.8(c)) totaling 60 minutes. A performance test shall consist of one run.

   [40 CFR 60.474(d) NSPS]

   Note: Additional testing is not required by the terms of this permit.

TEST METHODS AND PROCEDURES

10. **Compliance Testing:** The Permittee shall test the emissions for the following pollutant (s) during each federal fiscal year (October 1-September 30), and notify the Department 15 days prior to testing.

EU	EMISSION POINTS	POLLUTANT	TEST METHOD	RULE
001	EP1-S	Particulate Matter(3)	EPA Method 5A	40 CFR 60.474(a), (c) & (e)
	EP1-S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP2	Visible Emissions	EPA Method 22	40 CFR 60.474(d)
	EP3-S, EP4-S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP5-S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP7-S, EP8-S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP11 -S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP12-S	Particulate Matter	EPA Method 5A	40 CFR 60.474(a), (c) & (e)
	EP12-S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP13-S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP14-S	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP15, EP16	Visible Emissions	EPA Method 9 (1)	40 CFR 60.474(c)(5)
	EP17 (2)	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP18	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP19	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP20 (2)	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)
	EP21 (2)	Visible Emissions	EPA Method 9	40 CFR 60.474(c)(5)

(1) These emission units are vented outdoors and compliance testing is required.
(2) V.E. testing shall be conducted during rail unloading.
(3) The asphalt roofing production rate for each run shall be determined as follows: The amount of asphalt roofing produced on the saturated felt process lines shall be obtained by direct measurement. The asphalt roofing production rate is the amount produced divided by the time taken for the run.

[Rules 297.310(7)(a)2., 4., & 9., F.A.C., 40 CFR 60.474(c)(3) NSPS]

Note: Additional testing is not required by the terms of this permit.

11. Compliance Testing Verification: The Permittee may request to repeat the performance test and procedure outlined in 40 CFR 60.474(c) when each of the following occur:

EMISSION UNIT	EMISSION POINTS	REQUIREMENT
EU 001	EP1-S	The saturator gas temperature prior to the main filter, but after the quencher tray in device CVM 90 CTR-12 exceeds the temperature during the 2/17/99 NSPS test, 124°F by more than 25°F (149°F)
EU 001	EP12-S	The saturator gas temperature at the inlet of the control device CECO CS-16-A10-EA exceeds the temperature during the 8/14/01 NSPS test, 115°F by more than 25°F (140°F)

[40 CFR 60.474(f)]

MONITORING REQUIREMENTS

12. Compliance Monitoring: The owner or operator subject to the provisions of this subpart, and using either an electrostatic precipitator or a high velocity air filter to meet the emission limit in 40 CFR 60.472(a)(1) and/or (b)(1) shall continuously monitor and record the temperature of the gas at the inlet of the control device. The temperature monitoring instrument shall have an accuracy of ±15 °C (±25 °F) over its range.

    [40 CFR 60.473(a) NSPS]

13 Compliance Monitoring An owner or operator using a control device not mentioned in Specific Condition No. 11 shall provide to the Administrator information describing the operation of the control device and the process parameter(s) which would indicate proper operation and maintenance of the device. Continuous monitoring may be required and process parameters to be monitored may be determined by the Department.

    [40 CFR 60.473(c) NSPS]

    Note: Additional monitoring is not required by the terms of this permit.

NOTIFICATION, RECORDKEEPING AND REPORTING REQUIREMENTS

14. Annual Compliance Test(s) Report Submittal: The required test reports shall be filed with the Department as soon as practical but no later than 45 days after the last sampling run of each test is completed.

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

15. Recordkeeping Retention Compliance Test(s): The owner or operator shall maintain records of compliance onsite in either paper copy or electronic format for a period of 5 years following the date of such record. All records should be made available for an inspector's onsite review.

    [Rule 62-4.160(14),F.A.C.]

16. Control Unit/Temperature Record: The operating temperature of the control device during performance test shall be recorded and reported as required by §60.7(d). The record(s) of the temperature monitoring results shall be kept on site for at least two years and shall be made available upon Department's request.

    [Rule 62-4.070(3) 62-210.700(1), F.A.C. and 40 CFR 60.473(c) NSPS]

17. Control Unit/Maintenance Record: The owner or operator shall maintain the malfunction and maintenance records of the control unit. The record(s) shall be kept on site for at least 5 years, and shall be made available upon Department's request.

    The following information shall include but not be limited to:

    a. Date and type of malfunctions that occurred.
    b. Duration of the malfunction and correction action taken.
    c. Maintenance conducted on as a result of malfunction

    [Rule 62-4.070(3) 62-210.700(1), F.A.C.]

18. The permittee shall comply with the requirements of 40 CFR Part 60, Subpart A- General Provisions.

Note: Additional notification, reporting, and recordkeeping is not required by the terms of this permit.

1. **Categorical Exemptions:** The following emission unit meets the categorical exemption criteria pursuant to Rule 62-210.300(3)(a) 12. F.A.C.:

   Twelve (12) Kerosene Unit Heaters

2. **Generic Emissions Unit Exemptions:** The following emission units or pollutant-emitting activities meet the criteria for the Generic Emissions Unit Exemption pursuant to Rule 62-210.300(3)(b)1., F.A.C:

   Fuel oil storage tank A
   Fuel oil storage tank B
   Cooling section vent
   Plant Cleanup
   Steam Cleaning of CVM Filters
   #2 fuel oil-fired water heater
   Storage tanks for fuel oil, mineral spirits, cutback asphalt and surfactant
   Product mixers
   Hi Sol 10-storage tank (a high flash point naphtha solvent)
   Thermal Fluid Heater [DEP Determination Letter dated 07/15/2010]
   Felt rack Dust Collection System [DEP Determination Letter dated 09/29/2011]
   Finish Looper Belt Waste Collection System [DEP Determination Letter dated 09/29/2011]
   Granule Recycle Improvements [DEP Determination Letter dated 09/29/2011]
   Tank Pumping to Tanker (if no other means available) [DEP Determination Letter dated 09/29/2011]

3. **Exempt Source of Air Emissions Determination:** The following emission units or pollutant-emitting activities were determined to be exempt sources of air emissions pursuant to Rule 62-4.040(1)(b), F.A.C.:

   Line Painting System (see Koogler & Associates letter dated June 15, 2012 for specifics)
   Two screw conveyors, a shaker screen and a bucket elevator
   The use of a partially filled tanker truck with asphalt to calibrate an asphalt flow meter [DEP Determination letter dated September 16, 2003.]