Bonsal American, Inc.
Pensacola Plant
Facility ID No.: 0330109
Escambia County

Air Operation Permit
Permit No.: 0330109-011-AO

Permitting and Compliance Authority
Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, FL 32502-5740
Telephone: 850.595.8300
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Air Operation Permit
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Florida Department of Environmental Protection

Northwest District
160 W Government Street, Suite 308
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Governor

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Secretary

Permittee:
Bonsal American, Inc.

Permit No.: 0330109-011-AO
Facility ID No.: 0330109
SIC Nos.: 3272, 3295
Project: Air Operation Permit

This renewal permit is for the operation of the Pensacola Plant located at 150 East Olive Road, Escambia County; UTM Coordinates: Zone 16, 475.48 km East and 3375.2 km North; Latitude: 30°32' 29" North and Longitude: 87° 15' 20" West.

STATEMENT OF BASIS: This air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Effective Date: February 1, 2013
Renewal Application Due Date: December 3, 2017
Expiration Date: February 1, 2018

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

/s/

J. Charles Harp
Program Administrator
Waste Management/Air Resources
Northwest District

JCH/aj/c

Section I. Facility Information.

This is a renewal of Permit 0330109-009-AO, effective February 29, 2008. Permit modification 0330109-010-AO was issued September 11, 2008 which revised permit 0330109-009-AO with the incorporation of Permit 0330109-008-AC.

Subsection A. Facility Description.

This facility processes and packages premixed dry concrete, sand mix (masonry cement), and Portland cement. These products are pneumatically blown into bags through filling pipes. There are two packaging machines in the facility. One is used only for Portland cement, and the other is used for packaging premixed concrete and/or sand mix. The facility also consists of two cement silos, holding bins, conveyors and six permitted baghouses (BH1 – BH4, BH6 and BH7). BH5 is exempt, because it exhausts inside the building.

Process raw materials include sand, gravel and two types of cement. Portland cement is used in packaging premixed concrete, and masonry cement is used in the packaging of sand mix. Sand and gravel are trucked onsite and stored in stock piles. Cement is trucked onsite and pneumatically transferred into storage silos A or B. Silo A contains Portland cement and Silo B, contains Portland and/or masonry cement. The silos are located outdoors adjacent to the facility's screen house.

The dry concrete mix packaging process begins with conveying sand and gravel from the stock piles into a 12 MMBtu/hour, natural gas fired rotary drum. The dried material is transferred from the drum dryer by vertical bucket to the screen house where sand and gravel is screened into storage bins. The facility installed two new bin-top baghouses on these two bins as permitted in permit 0330109-007-AC. Permit modification 0330109-008-AC was issued to add two bin-top baghouses on the sand and gravel bins (named BH-6 and BH-7) equipped with exhaust blowers (1,000 ACFM) that run continuously to remove heat released from the dried material. The exhaust from these two baghouses was routed through a duct to BH-1, but the moisture in the airstream created problems. The two baghouses are now vented to the atmosphere.

A masonry cement holding bin is adjacent to the sand and gravel bins. Process materials are then fed from the corresponding storage bin or silo into a mixing screw conveyor. Once mixed, the product is discharged into a closed chute that drops the material into a fully enclosed packaging bin. The concrete mixture is then packaged into paper bags for shipment by one of the facility's two packaging machines. Portland cement is conveyed directly to a packaging (holding) bin by an enclosed screw where the cement is fed into paper bags for shipment by the other packaging machine.

Based on the permit application received December 27, 2012, this facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
012	Concrete Products Processing/Packaging

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:
Permit Application (EPSAP No. 3396-1) received December 27, 2012

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. All listed Appendices are part of this permit.

2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants that cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]

3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, 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). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rules 62-296.320(4)(b)1. & 4., F.A.C.]

4. 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 standards contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests that 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. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310(7)(b), F.A.C.]

5. Asbestos. This permit does not authorize any demolition or renovation of the facility or its parts or components which involves asbestos removal. This permit does not constitute a waiver of any of the requirements of Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, National Emission Standard for Asbestos, adopted and incorporated by reference in Rule 62-204.800, F.A.C. Compliance with Chapter 62-257, F.A.C., and 40 CFR 61, Subpart M, Section 61.145, is required for any asbestos demolition or renovation at the source. [40 CFR 61; Rule 62-204.800, F.A.C.; and, Chapter 62-257, F.A.C.]

6. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department. No vapor emission control devices or systems are deemed necessary or ordered at this time. [Rule 62-296.320(1), F.A.C.]

7. 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. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a) Paving and maintenance of roads, parking areas, and yards.
b) Application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions.

c) Removal of particulate matter from roads and other paved areas under control of the owner or operator, and from buildings or work areas to prevent entrainment.
d) Enclosure or covering of conveying systems.
e) Reduction of stockpile height or installation of windbreakers to mitigate wind entrainment of particulate matter from stockpiles.
f) Use of hoods, fans, filters and similar equipment to contain, capture and/or vent particulate matter.
g) Posting of vehicle (or truck) speed limits.

[Rule 62-296.320(4)(c), F.A.C.; Permit 0330109-008-AC]

8. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit four permit renewal applications using the current version of the renewal form along with the processing fee established in Rule 62-4.050(4), F.A.C., to the Northwest District office of the Department. You can obtain a permit application form or apply for permit renewal electronically at the following web address: http://www.dep.state.fl.us/air/emission/permitting.htm. [Rule 62-4.090, F.A.C.]

9. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 W Government Street, Suite 308
Pensacola, Florida 32502-5740
Telephone: 850.595.8300; Fax: 850.595.8096

Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us.

10. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is 850.595.8300, day or night, and for emergencies involving a significant threat to human health or the environment is 800.320.0519. For routine business, telephone 850.595.8300 during normal working hours. [Rules 62-210.700 and 62-4.130, F.A.C.]

11. Operations & Maintenance Plan (O&M)
This plan outlines the procedures Permittee incorporates during the normal operation of this facility and provides necessary assurance that the facility will operate in compliance. Permittee shall follow all procedures outlined in the most recently submitted and approved O&M. All records of inspections, site compliance evaluation records and preventive maintenance records shall be retained on site for a period of at least three years and made available for Department inspection. [Rules 62-4.070 and 62-4-160 F.A.C.]
{Permit Note: An O&M Plan should be a living document that provides procedures to help in maintaining the subject facility in compliance with applicable air regulations. Keeping this document up-to-date with the facility's current activities will not require any permit action; however, modifications shall be submitted to the Department for approval. This does not alleviate the facility from the air construction permitting requirements for facility modifications per Rule 62-210.300(1)(a), F.A.C.}

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

E.U. ID No.	**Brief Description**
012	Concrete Products Processing/Packaging

Particulate emissions from gravel and sand drying (12 MMBtu/hr, natural gas drum dryer) are controlled by an exhaust hood located above the drum dryer discharge. The exhaust hood is connected to an exhaust duct leading to a baghouse (BH-1). Dried material is transferred from the drum dryer by vertical bucket elevator to a screen house where sand and gravel are screened into storage bins. Two bin-top baghouses (BH-6 and BH-7) on the sand and gravel bins are equipped with exhaust blowers (1,000 ACFM) that run continuously to remove heat released from the dried material. Exhaust from these two baghouses is vented to the atmosphere. The filtered dust from BH-1 is conveyed by enclosed screw and vertical bucket elevator into the facility's screen house. The vertical elevator's emissions also are controlled by the drum dryer's exhaust system.

Emissions from material mixing, material conveyance to the packaging bins and the packaging process itself are controlled by a system of hoods and ducts leading to a baghouse (BH-2). Filtered dust from BH-2 is screw conveyed back into the missing materials vertical bucket elevator. Emissions from the loading of Silo A (Portland cement) and Silo B (Portland and/or masonry cement) are controlled by baghouses (BH-3 and BH-4, respectively).

Emissions created from pneumatically conveying masonry cement into its holding bin located adjacent the screen house are controlled by a baghouse (BH-5). However, since this baghouse and its discharge are located inside the Bonsal American facility (indoors), BH-5 is not required to be permitted or tested.

The 12 MMBtu/hour natural gas fired rotary drum dryer is not exempt from permitting by Rule 62-210.300(3)(b)1., F.A.C, because potential CO emissions are 7 tons per year.

The following specific conditions apply to the emissions unit listed above:

Essential Potential to Emit (PTE) Parameters

A.1.a. Capacity. Cement loading into Silos A and B shall not exceed 7,000 tons per consecutive 12-month rolling period with an unloading compressed air limit of 10 psig max. The cumulative total of sand and gravel to be processed shall not exceed 35,000 tons per rolling 12-month period. Therefore, the total amount of cement, sand and gravel to be processed and packaged shall not exceed 42,000 tons per consecutive 12-month rolling period. [Rules 62-4.160(2), 62-4.070(3) and 62-210. 200(PTE), F.A.C., and Permit 0330109-005-AC]

A.1.b. Operating rate for testing purposes only. The maximum operating rate during testing for the sand and gravel drum dryer is 40 tons per hour; for the packaging activity is 130 bags per hour (94 lb/bag) for cement packaging and 1,000 bags per hour (60 lb/average bag) for premixed concrete packaging. [Rules 62-4.160(2), 62-4.070(3) and 62-210. 200(PTE), F.A.C., and Permit 0330109-005-AC]

A.2. Methods of Operation. All permitted baghouses shall be operated within a pressure drop range as specified in the most recently approved Operation and Maintenance (O&M) Plan. If the pressure drop is

observed to be outside of the ranges specified, the process in which the unit controls shall be shutdown and the procedures outlined in the O&M Plan shall be followed to resolve the deficiency. All other procedures for inspections, monitoring, maintenance, corrective actions and recordkeeping specified in the most recently approved O&M Plan shall be followed. This Plan may be updated by the permittee as needed by submitting a revised version for approval. [Rule 62-4.160(2), 62-4.070(3) F.A.C., Permits 0330109-007-AC and 0330109-008-AC]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rules 62-4.160(2), 62-4.070(3) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.4. Visible Emissions. Silos A and B (baghouses BH-3 and BH-4), weigh hoppers, sand/gravel drum drying (baghouses BH-1, BH-6 and BH-7), packaging/screening (baghouse BH-2), and other storage or conveying equipment shall be controlled to the extent necessary to limit visible emissions to 5 percent opacity. [Rule 62-296.414(1), F.A.C., Permits 0330109-007-AC and 0330109-008-AC]

Test Methods and Procedures

A.5.a. Visible emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Such tests shall be conducted annually during each federal fiscal year (October 1 – September 30) and generally at 12-month intervals. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us.

Pollutant	Test Method
VE	EPA Method 9 (30 minutes)

[Rules 62-4.070, 62-297.310(7), 62-297.401(9), and 62-296.414(3)(a), F.A.C.]

A.5.b. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7), F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.5.c. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

A.6. Visible emissions testing of silo A and B dust collectors (BH-3 and BH-4) shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. Each test shall state the actual silo-loading rate during emissions testing. [Rule 62-296.414(3)(c), F.A.C., Permits 0330109-007-AC and 0330109-008-AC]

Recordkeeping and Reporting Requirements

A.7. The Permittee shall maintain records that shall include at a minimum:

a. Date, start and stop time, unloading pressure used (psig), and quantity of cement (Portland and/or masonry) unloaded.
b. Consecutive 12-month rolling unloaded cement totals (tons/month).
c. Daily baghouse (BH-1, BH-2) pressure differential readings (inches WG); date and description of maintenance conducted on baghouses BH-1, BH-2, BH-3, BH-4, BH-6 and BH-7 are results of daily visual tightness inspection.
d. Explanation when daily pressure differential readings are outside the ranges specified in the Operation and Maintenance Plan and the corrective action taken.
e. Date and reason of all bag replacements (BH-1 through BH-4 and BH-6 and BH-7).
f. Consecutive 12-month rolling cumulative sand and gravel processing totals (tons/month).
g. Consecutive 12-month rolling material packaged totals (tons/month).
h. All recordkeeping not listed here but indicated on the most recent Department approved O&M Plan at the facility to include the new baghouses BH-6 and BH-7.

All records shall remain on site for a minimum of three years, conform to the recording format provided in the most recent O&M Plan, and be made available for Department inspection upon request.
[Rules 62-4.070 and 62-4-160, F.A.C]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the purpose of:

a. Have access to and copy any records that must be kept under conditions of this permit;
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and,
c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

a. A description of and cause of noncompliance; and
b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages that may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the Department approves the transfer.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurements;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used;
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.