

Memo to File:

From: Bob Kriegel

Date: May 31, 2000

Re: **Application for Construction Permit for an additional Product Storage Bin and Truck Loading Spout, Engelhard Corporation, Gadsden County; Facility ID no. 0390005, Application number 0390005-003-AC**

Engelhard submitted an application for a construction permit for an additional product storage bin and truck loading spout for their granular attapulgite clay operation at their Quincy facility. Engelhard notes that the additional storage bin and spout will not increase production, but will simply provide an alternative loading capability when the existing rail service is inadequate.

Engelhard requests that consideration be given to not requiring a construction permit since this proposed bin and loading spout will simply divert product from existing equipment, and, as a result will not substantially increase emissions. The existing equipment includes similar pollution control equipment – baghouses. The total projected emissions from this activity is identified as 0.44 TPY.

However, this is new construction, and the activity is regulated and subject to 40 CFR 60 Subpart OOO, and this is a new emission point. As such, I believe a CP is appropriate.

No fee was submitted with the application. The facility is a Title V facility operating under permit 0390005-002-AV, issued March 16, 1999. No processing fee is required for a construction permit pursuant to Rule 62-4.050(4)(a)2.

Both the emissions from this activity, and any additional emissions will be minimal. The baghouse is comparable to other existing equipment. I suggest we simply proceed with issuance of notice of intent to issue the CP.