BASF Corporation
Quincy Operations

Facility ID No. 0390005
Gadsden County

Title V Air Operation Permit Renewal

Permit No. 0390005-019-AV
(Renewal of Title V Air Operation Permit No. 0390005-014-AV)

Permitting and Compliance Authority:

State of Florida
Department of Environmental Protection
Waste Management/Air Resources Program
Northwest District

160 W. Government Street, Suite 308
Pensacola, Florida 32502-5740

Telephone: 850.595.8300
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Date

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Title V Air Operation Permit Renewal
Permit No. 0390005-019-AV
Renewal of Title V Air Operation Permit No. 0390005-014-AV

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Florida Department of
Environmental Protection
Northwest District
160 W. Government Street
Pensacola, Florida 32502

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

DATE

PERMITTEE:
BASF Corporation
1101 North Madison Street
Quincy, Florida 32352
Renewal

Permit No. 0390005-019-AV
Quincy Operations
Facility ID No. 0390005
Title V Air Operation Permit

The purpose of this permit is to renew and revise the Title V air operation permit for the above referenced facility. The existing Quincy Operation is an Attapulgite Clay and Fuller's Earth processing facility located in Gadsden County at 1101 North Madison Street in Quincy, Florida. UTM Coordinates: Zone 16, 732.6 km East and 3387.5 km North and, and, Latitude: 30° 36' 15" North and Longitude: 84° 34' 25" West.

The Title V 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, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: DATE, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. DATE + 5 years, 20xx

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

JCH/ha/m

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Section I. Facility Information

This is a renewal of Title V air operation permit No. 0390005-014-AV, effective January 26, 2010, and incorporates the terms and conditions of permit No. 0390005-020-AC, which is being processed concurrently with this renewal.

Changes to the Current Title V Air Operation Permit

Permit No. 0390005-020-AC authorizes the following changes to the current Title V air operation permit. There are no physical changes associated with this project and emissions limits remain unchanged.

1) EU 002 - No. 4A Mill Scrubber: Indicate that the process rate is in dry tons.
2) EU 008 - No. 4 Mill Scrubber: Indicate that the process rate is in dry tons.
3) EU 019 - No. 4B Mill Scrubber: Indicate that the process rate is in dry tons.
4) EU 015 - No. 2 Kiln Scrubber, CAM Plan: Revise the scrubbing liquid flow rate from 200 - 400 gpm to 300 - 500 gpm.
5) EU 013 - NFG Fugitive Dust Collector: The operation rate is revised from 12 TPH and 105,120 TPY to 20 TPH and 175,200 TPY.
6) EU 022 - East Bin CGS Bin Vent: The operation rate is revised from 25 TPH and 219,000 TPY to 30 TPH and 262,800 TPY.
7) EU 023: West Bin CGS Bin Vent: The operation rate is revised from 25 TPH and 219,000 TPY to 30 TPH and 262,800 TPY.
8) EU 025 - NFG ACM Mill Product Dust Collector: The operation rate is revised from 8 TPH and 70,080 TPY to 20 TPH and 175,200 TPY.
9) EU 028 - NFG Bagger Dust Collector: The operation rate is revised from 12 TPH and 105,120 TPY to 20 TPH and 175,200 TPY.
10) EU 039, EP 48 - Receiver Bin 200 Vent: The operation rate is revised from 4.2 TPH and 33,600 to 30 TPH and 240,000 TPY.
11) EU 039, EP 53 - No. 2 Classifier 300 Bin Vent: The operation rate is revised from 4.2 TPH and 16,800 to 20 TPH and 80,000 TPY.
12) EU-038, EP 41d - Product Bin 600: The hours of operation is revised from 3,500 to 4,000 hours per year.

Per the Application received June 16, 2014, the original permitted production rates were based on manufacture specification sheets which guaranteed the minimum process rates that the equipment could process. However, depending on the type of material being processed, the equipment has the potential to process more than the stated minimum value. Therefore, BASF is requesting an increase in the process throughput rate for the emissions units listed above. There have been no changes to the equipment or operations.

Subsection A. Facility Description

The BASF Corporation, Quincy Operations, processes Attapulgite Clay and Fuller's Earth in two major production lines: Granular Processing and Gel Processing. The crude clay is trucked from the mines to the facility and either stockpiled by quality or fed directly to a primary crusher. Granular processing consists of crushing, drying, sizing and packing operations. Gel processing consists of crushing, extruding with additives (magnesium oxide), drying/milling, classifying and packing operations. Based on production needs and clay quality, it may be blended by mixing various grades using a front end loader. The clay is then stored under the Granular Storage Shed or the Gel Storage Shed, depending on the clay quality.

Particulate matter (PM) emissions resulting from clay handling and processing are controlled by baghouses. Emissions from the natural gas-fired or propane-fired equipment (Granular Clay and Gel Clay fired equipment) are controlled by baghouses or scrubbers.

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Granular Processing

A front-end loader feeds clay from the Granular Crude Shed to the crusher and screening systems to reduce the size to one-half inch. The crude feed may be blended with extrudite material and fed to the Fluid Bed Dryer. The clay is fed directly from the dryer to the No. 1A Mill or stored in a stock bin. A reconstitution system consisting of three extruders is used to handle fines. Water is added to the fines from the Granular Processing Systems and passed through the extruders. The extrudite is added to the crude clay and sent to the Fluid Bed Dryers.

In the No. 1A Mill the clay is passed through primary screens to make a 6/60 mesh cut. The oversized material (overs) is passed through roller mills and sent to secondary screens. The overs from the secondary screens are sent to roller mills. The overs from these mills are sent to screening and the roller mill recirculation circuit. The product from this operation is stored in a bin. The fines are pumped back to the Fluid Bed reconstitution system.

Clay from the product bin is sent to three mesh screens. The product is sent to the No. 2 Kiln and calcined. The No. 2 Kiln product is sent to a rotary cooler and, from the cooler, the product is put into a storage bin for bagging or bulk shipment.

Clay from the 6/60 bin can also be sent to the screen tower. The screen tower consists of 18 sifters and storage bins. The sifters are set up to make various size products. Screen tower products can be shipped as product or calcined. The output of the No.1 Kiln goes to a rotary cooler. From the No.1 Cooler the product goes to bins for bagging or bulk shipment. The Granular Shipping area includes a packer, palletizer and stretch wrap machine. The granular product can be shipped in bags, bulk trucks and bulk railcars.

Gel Processing

A front end loader transports clay to a feed system for four extruders. A screw feeder may be used to add magnesium oxide to the extruder feed. The clay then goes to one of three dryer mills to be dried and sized. The clay is recovered from the air stream by a cyclone collector. From the Mills, the clay is pumped pneumatically to the Gel Shipping Area or bulk loaded for shipment. The shipping area includes a palletizer, packers and stretch wrap machines.

Fine Grind

Ultrafine Air Classifying Mills (ACM) are used for size reduction of various products to microfine particle sizes. Some of the clay from the Gel Mills is sent to either Fine Grind for ACM Milling or Ultra Fine Grind for additional processing. In ACM Milling, the clay is sent to a pulverizer mill where the clay is ground. The clay from the mill is sent to the classifier to make the final product cuts. The products can then be loaded in bulk or bagged for shipment. In Ultra Fine Grind, clay is fed to two jet mills where the clay is ground. The clay from the mill is sent to a classifier to make the final product cuts. The products can then be loaded in bulk or bagged for shipment.

The facility includes emissions units subject to NSPS (40 CFR 60 subpart OOO) as a result of the date of construction of the affected equipment. Emission units subject to NSPS include the Gel Clay Production Equipment and the ACM Milling/Ultra Fine Grind Equipment. These NSPS standards apply to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. The permit limits are comparable or more stringent then those required by NSPS and include 5% opacity limits.

The clay mining areas are not contiguous with the process plant areas and are not included in this Title V facility permit.

The facility is subject to a facility-wide NOx limit of 124 tons per year, associated with a BACT determination for the construction of the north and south fluid bed dryers (Air construction permits AC20-41424 and AC2041425, issued August 4, 1981).

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Since BASF has a potential-to-emit more than 250 tons of PM per year (297 tons/yr), the facility is a major source under Prevention of Significant Deterioration (PSD) and any future modifications and/or construction must be evaluated with respect to the preconstruction review requirements of Chapter 62-212, F.A.C. This facility is not a major source of hazardous air pollutants (HAP).

Subsection B. Summary of Emissions Units

Subsection A: Gel Clay Production Equipment Not Subject to NSPS (Baghouses)	
E.U. ID No.	**Brief Description**
017	CGS Bulk Truck Loading Dust Collector
021	CGS West Bagging Dust Collector
022	East Bin CGS Bin Vent
023	West Bin CGS Bin Vent
024	Miscellaneous CGS Bin Vent
025	NFG ACM Mill Product Dust Collector
026	MS4 Old Classifier NFG Dust Collector
Subsection B: Gel Clay Production Equipment Subject to NSPS (Baghouses)	
E.U. ID No.	**Brief Description**
013	NFG Fugitive Dust Collector
016	MGO System Dust Collector
018	No. 4 Mill Fugitive Dust Collector
020	CGS East Bagging Dust Collector
028	NFG Bagger Dust Collector
Subsection C: Granular Clay Production Equipment Subject to NSPS (Baghouses)	
E.U. ID No.	**Brief Description**
011	Old Roller Mill Fugitive Dust Collector
031	FLBD Stock Bin Dust Collector
032	Fine Bin FLBD Dust Collector
033	No.1A Mill Fugitive Dust Collector
035	Kiln Fugitive Dust Collector
036	Granular Shipping Dust Collector
Subsection D: Granular Clay Production Equipment Not Subject to NSPS (Baghouses)	
E.U. ID No.	**Brief Description**
030	South Fluid Bed Dryer Dust Collector
Subsection E: Granular Clay Production Equipment Not Subject to NSPS (Scrubbers)	
E.U. ID No.	**Brief Description**
014	No. 1 Kiln Scrubber
015	No. 2 Kiln Scrubber
Subsection F: Gel Clay Fired Equipment Not Subject to NSPS (Scrubbers)	
E.U. ID No.	**Brief Description**
002	No. 4A Mill Scrubber
008	No. 4 Mill Scrubber
019	No. 4B Mill Scrubber
Subsection G: ACM Milling/Ultra Fine Grind Equipment Subject to NSPS (Baghouses)	
E.U. ID No.	**Brief Description**
038	100 Feed Bin Dust Collector
	800 Bin Vent
	SFG ACM Mill Product Dust Collector
	No.1 Classifier 150 Bin Vent
	Product 400 Bin Vent
	Product 405 Bin Vent

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	Product 410 Bin Vent
	Product 600 Bin Vent
	Product 700 Bin Vent
	No. 4 Truck Loading Bin Vent
	SFG RLO Dust Collector
	SFG Bagging Dust Collector
	3 Dock Bagging Dust Collector
	No. 5 Load Out Bin Vent
039	Receiver 200 Bin Vent
	No. 1 FEM Dust Collector
	No. 2 FEM Dust Collector
	No. 2 Classifier 300 Bin Vent
	CGS RLO Dust Collector
	Product Bin 151

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

Subsection C. Applicable Regulations.

Based on the Title V air operation permit renewal application received June 16, 2014, this facility is not a major source of hazardous air pollutants (HAP). The existing facility is a prevention of significant deterioration (PSD) major source of air pollutants in accordance with Rule 62-212.400, F.A.C. A summary of applicable regulations is shown in the following table.

Regulation	**EU ID No.**
Federal Rule Citations	
40 CFR 60 Subpart A - NSPS General Provisions	013, 016, 018, 020, 028, 011, 031, 032, 033, 035, 036, 038, 039
40 CFR 60, Subpart OOO – Performance Standards for Nonmetallic Mineral Processing Plants	013, 016, 018, 020, 028, 011, 031, 032, 033, 035, 036, 038, 039
40 CFR 64 - Compliance Assurance Monitoring Requirements	030, 014, 015, 002, 008, 019
State Rule Citations	
Rule 62-4.070(3), F.A.C.	Facility-Wide
Rule 62-210.200(PTE), F.A.C.	Facility-Wide
Rule 62-210.700, F.A.C.	017,021, 022, 023, 024, 025, 026, 030, 014, 015, 002, 008, 019
Rule 62-212.400, F.A.C.	Facility-Wide
Rule 62-213.410, F.A.C.	Facility-Wide
Rule 62-213.440(1), F.A.C.	Facility-Wide
Rule 62-296.320(1), F.A.C.	Facility-Wide
Rule 62-296.320(2), F.A.C.	Facility-Wide
Rule 62-296.320(4)(b)1. & 4., F.A.C.	Facility-Wide
Rule 62-296.320(4)(c), F.A.C.	Facility-Wide
Rule 62-297.310, F.A.C.	Facility-Wide
Rule 62-297.401, F.A.C.	Facility-Wide
Rule 62-297.620(4), F.A.C.	Facility-Wide

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The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices. The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General 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, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department.
[Rule 62-296.320(1), F.A.C. and Permit No. 0390005- 015-AC]
{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. 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 other dust suppressants to unpaved roads, yards, open stock piles and similar activities.
c. Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.
d. Landscaping or planting of vegetation.
e. Repair rotary feeder leaks, dust piping holes, general equipment leaks immediately upon detection.
f. Vacuum sweep regularly.
g. Minimize dust generation during bag stacking by using improved work procedures.
h. Use extreme caution and carefulness while changing out dust collector bags.
i. Utilize control equipment as necessary during loadout of open trucks.
j. Control belt speeds to minimize transfer points emissions, use regular maintenance of dust pick up points.
k. Confining abrasive blasting wherever possible.

[Rule 62-296.320(4)(c), F.A.C.; and Permit No. 0390005- 015-AC]

Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

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

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(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.****}*

FW7. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (b), F.A.C.]

Other Requirements

FW8. Emissions of Nitrogen Oxide. Facility-wide nitrogen oxide (NOx) emissions are limited to 124 tons per year. [Rule 62-4.070(3), F.A.C.; and permits AC20-41424 and AC20-41425]

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The specific conditions in this section apply to the following emissions units:

Gel Clay Production Equipment Not Subject to NSPS (Baghouses)	
EU No.	**Brief Description**
017	CGS Bulk Truck Loading Dust Collector
021	CGS West Bagging Dust Collector
022	East Bin CGS Bin Vent
023	West Bin CGS Bin Vent
024	Miscellaneous CGS Bin Vent
025	NFG ACM Mill Product Dust Collector
026	MS4 Old Classifier NFG Dust Collector

These regulated emissions units include gel Attapulgite clay production equipment constructed prior to August 31, 1983. The equipment includes conveyors, classifiers, storage bins and bag packers. These emissions units are not subject to NSPS (40 CFR 60 Subpart OOO), but are subject to BACT.

Permit No. 0390005-015-AC authorized modifications to Emissions Units 022, 023 and 024 that included installation of a new Cyclonaire Pneumatic Transporter and modification of existing pneumatic transporters, Con 100 and Con 500. These pneumatic transporters and the rotary valve have no unit-specific requirements under 40 CFR 60 subpart OOO.

Permit No. 0390005-018-AC authorized installation of a portable bulk bag reclamation system that affected Emissions Units 017, 022 through 024.

Emission limits include 5% opacity (original BACT) and 0.017 gr/dscf (applicant's request, used as supporting information in original construction permit.

Emissions are controlled by dust collectors, identified as follows:

EU No.	Description	Baghouse
017	CGS Bulk Truck Loading Dust Collector	Seneca 100-IM-8 with 100 polyethylene bags
021	CGS West Bagging Dust Collector	Flex-Kleen 84-CTBS-74-III with 74 polyethylene bags
022	East Bin CGS Bin Vent	Flex-Kleen 84-BVBS-36 with 36 polyethylene bags
023	West Bin CGS Bin Vent	Flex-Kleen 84-BVBS-36 with 36 polyethylene bags
024	Miscellaneous CGS Bin Vent	Flex-Kleen 84-BVBS-36 with 36 polyethylene bags
025	NFG ACM Mill Product Dust Collector	Mikro-Pulsaire 289S-8-40 with 289 polyethylene bags
026	MS4 Old Classifier NFG Dust Collector	Mikro-Pulsaire 81S-20 with 81 polyethylene bags

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Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum process throughput rate shall not exceed the following:

EU No.	Description	Operation Rate	
		TPH	TPY
017	CGS Bulk Truck Loading Dust Collector	35	306,600
021	CGS West Bagging Dust Collector	18	157,680
022	East Bin CGS Bin Vent	30	262,800
023	West Bin CGS Bin Vent	30	262,800
024	Miscellaneous CGS Bin Vent	10	87,600
025	NFG ACM Mill Product Dust Collector	20	175,200
026	MS4 Old Classifier NFG Dust Collector	3	26,280

[Rules 62-4. 070(3) and 62-210.200(PTE), F.A.C.; and Permit Nos. 0390005-015-AC, 0390005-002-AV, and 0390005-020-AC]

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rules 62-210.200(PTE), and 62-213.410, F.A.C.; and Permit No. 0390005-002-AV]

A.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

A.4. Visible Emissions: Visible emissions (VE) shall not exceed 5% opacity.
[Rule 62-297.620(4), F.A.C. and Permit No. 0390005-002-AV]

A.5. Particulate Matter**:** Particulate matter (PM) shall not exceed the following:

EU No.	Description	Particulate Matter (PM) Limits		
		Limits	Estimated Emissions	
		gr/dscf	PPH	TPY
017	CGS Bulk Truck Loading Dust Collector	0.017	0.6	2.5
021	CGS West Bagging Dust Collector	0.017	0.7	3.2
022	East Bin CGS Bin Vent	0.017	0.4	1.9
023	West Bin CGS Bin Vent	0.017	0.4	1.9
024	Miscellaneous CGS Bin Vent	0.017	0.2	0.9
025	NFG ACM Mill Product Dust Collector	0.017	1.7	7.3
026	MS4 Old Classifier NFG Dust Collector	0.017	0.7	2.9
		Total:	**4.7**	**20.6**

[Permit Nos. 0390005-002-AV, 0390005-018-AC, and 0390005-020-AC]

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Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

A.6. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

A.7. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

A.8. The permittee shall maintain a record of baghouse pressure differentials, recording the pressure drops at least at each shift change or every eight hours, whichever is more frequent. [Rule 62-4.070(3), F.A.C.; Permit No. 0390005-002-AV]

{Permitting Note: The baghouse pressure differential should be within the normal operational range of 0.5" to 5" WG. If the pressure differential is observed outside of the normal operation parameters, appropriate corrective action should be taken immediately.}

Test Methods and Procedures

A.9. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Methods	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C.]

A.10. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

A.11. Compliance Tests Prior To Renewal. A compliance test for visible emissions shall be performed on each emissions unit once during the permit cycle (every five years), prior to the permit renewal application due date, so the results can be included with the submission of the permit renewal application. The VE test duration shall be 30 minutes. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rule 62-297.310, F.A.C.; and permits 0390005-015-AC and 0390005-002-AV]

A.12. Particulate Matter. Compliance with PM limits is demonstrated by compliance with the alternative visible emissions standard of 5 percent opacity. In the event any emissions unit does not satisfactorily demonstrate compliance with the alternative VE opacity standard, each such emissions unit shall demonstrate compliance with the PM standard by EPA Method 5 within 90 days of the visible emissions test date. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; and Permit No. 0390005-002-AV]

Other Requirements

A.13. Determination of Process Variables. See Combined Appendices, Appendix TR. [Rule 62-297.310(5), F.A.C.]

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Subsection B. Gel Clay Production Equipment Subject to NSPS

The specific conditions in this section apply to the following emissions units:

Gel Clay Production Equipment Subject to NSPS (Baghouses)	
E.U. No.	**Brief Description**
013	NFG Fugitive Dust Collector
016	MGO System Dust Collector
018	No. 4 Mill Fugitive Dust Collector
020	CGS East Bagging Dust Collector
028	NFG Bagger Dust Collector

These regulated emissions units include gel Attapulgite clay production equipment modified after August 31, 1983. The equipment includes conveyors, classifiers, storage bins, bag packers and emissions from miscellaneous fugitive sources subject to BACT and 40 CFR 60 Subpart OOO.

These emissions units are subject to the requirements in 40 CFR 60.672(a). Operations enclosed in a building are subject to the requirements in 40 CFR 60.672(e). The facility has requested the alternate VE standard of 5% opacity in accordance with Rule 62-297.620(4), F.A.C., to demonstrate compliance with the PM limits, which is more stringent than the limits in 40 CFR 60.672.

Permit No. 0390005-018-AC authorized installation of a portable bulk bag reclamation system that affected Emissions Units 013 and 018.

Emission limits include 5% opacity (original BACT, more stringent than NSPS standard of 7% opacity) and 0.05 grams per dry standard cubic meter (0.022 gr/dscf).

Emissions are controlled by dust collectors, identified as follows:

EU No.	Description	Baghouse
013	NFG Fugitive Dust Collector	Flex-Kleen 100-WMWC-525-III with 525 polyethylene bags
016	MGO System Dust Collector	Flex-Kleen 100-WRW-80-III with 80 polyethylene bags
018	No. 4 Mill Fugitive Dust Collector	Flex-Kleen 100-WMWC-600-III with 600 polyethylene bags
020	CGS East Bagging Dust Collector	Flex-Kleen 84-CTB-74-III with 74 polyethylene bags
028	NFG Bagger Dust Collector	Flex-Kleen 100-WMW-360 with 360 polyethylene bags

Essential Potential to Emit (PTE) Parameters

B.1. Permitted Capacity. The maximum process throughput rate shall not exceed the following:

EU No.	Description	Maximum Process Throughput Rate	
		TPH	**TPY**
013	NFG Fugitive Dust Collector	20	175,200
016	MGO System Dust Collector	33	289,080
018	No. 4 Mill Fugitive Dust Collector	33	289,080
020	CGS East Bagging Dust Collector	25	219,000
028	NFG Bagger Dust Collector	20	175,200

[Rules 62-4. 070(3) and 62-210.200(PTE), F.A.C.; and Permit Nos. 0390005-002-AV and 0390005-020-AC]

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

B.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

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Emission Limitations and Standards

B.4. Visible Emissions: Visible emissions shall not exceed 5% opacity. [Rule 62-297.620(4), F.A.C.]

B.5. Particulate Matter: Particulate matter for each emission point shall not exceed the following:

EU ID No.	Description	Particulate Matter (PM) Limits gr/dscf	Estimated Emissions lbs/hr	Estimated Emissions TPY
013	NFG Fugitive Dust Collector	0.022	2.7	11.7
016	MGO System Dust Collector	0.022	0.7	3.1
018	No. 4 Mill Fugitive Dust Collector	0.022	3.9	17.1
020	CGS East Bagging Dust Collector	0.022	0.9	4.1
028	NFG Bagger Dust Collector	0.022	2.4	9.9
		Total	**10.6**	**45.9**

[BACT, 40 CFR 60.672; and Permit Nos. 0390005-018-AC and 0390005-002-AV]

(1) The permittee shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which:
   a. Contain particulate matter in excess of 0.022 gr/dscf; and
   b. Exhibit greater than 5 percent opacity.

(2) If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in B.5.(1) above, or the building enclosing the affected facility or facilities must comply with the following emission limits:
   a. Fugitive emissions from the building openings (except for vents as defined in §60.671) must not exceed 5 percent opacity; and
   b. Vents (as defined in §60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of 40 CFR 60 Subpart OOO.

[40 CFR 60.672(a) and 40 CFR 60.672(e)]

{Permitting Note: The 7% opacity limitation contained in 40 CFR 60.672 is replaced with a 5% opacity limitation at the Permittee's request in accordance with Rule 62-297.620(4) as an alternate PM compliance standard.}

Monitoring of Operations

B.6. The permittee shall maintain a record of baghouse pressure differentials, recording the pressure drops at least at each shift change or every eight hours, whichever is more frequent. [Rule 62-4.070(3), F.A.C.; Permit No. 0390005-002-AV]

{Permitting Note: The baghouse pressure differential should be within the normal operational range of 0.5" to 5" WG. If the pressure differential is observed outside of the normal operation parameters, appropriate corrective action should be taken immediately.}

Test Methods and Procedures

B.7. Test Methods. Required tests shall be performed in accordance with the following reference method:

EPA Methods	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C.]

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B.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.9. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions. The VE test duration shall be 30 minutes. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

B.10. Particulate Matter. Compliance with the particulate matter emission limit may be demonstrated by compliance with the alternative opacity standard of 5%. In the event any emissions unit does not satisfactorily demonstrate compliance with the alternative VE opacity standard, each such emissions unit shall demonstrate compliance with the PM standard by EPA Method 5 within 90 days of the visible emissions test date. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; Permit No. 0390005-002-AV]

{Permitting Note: To demonstrate compliance with the fugitive emission limits for buildings specified in §60.672(e)(1), the owner or operator must complete the testing specified in paragraphs (d)(1) and (2) of §60.675. Initial performance tests must be conducted while all affected facilities inside the building are operating. Initial performance testing for building fugitive emissions required by §60.8 and §60.675 has been completed.}

NSPS Requirements

B.11. 40 CFR 60 Requirements. All requirements of 40 CFR 60, Subpart A - General Provisions, as identified in Table 1 to Subpart OOO of Part 60, and 40 CFR 60 Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants, applicable to this source shall be adhered to. [40 CFR 60.670(a) and Permit No. 0390005-002-AV]

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The specific conditions in this section apply to the following emissions units:

Granular Clay Production Equipment Subject to NSPS (Baghouses)	
E.U. ID No.	**Brief Description**
011	Old Roller Mill Fugitive Dust Collector
031	FLBD Stock Bin Dust Collector
032	Fine Bin FLBD Dust Collector
033	No.1A Mill Fugitive Dust Collector
035	Kiln Fugitive Dust Collector
036	Granular Shipping Dust Collector

These regulated emissions units consist of granular clay production equipment modified after August 31, 1983. The equipment includes conveyors, classifiers, storage bins, bag packers and emissions from miscellaneous fugitive sources subject to BACT and 40 CFR 60 Subpart OOO.

These emissions units are subject to the requirements in 40 CFR 60.672(a). Operations enclosed in a building are subject to the requirements in 40 CFR 60.672(e). The facility has requested the alternate VE standard of 5% opacity in accordance with Rule 62-297.620(4), F.A.C., to demonstrate compliance with the PM limits, which is more stringent than the limits in 40 CFR 60.672.

Emission limits include 5% opacity (original BACT, which is more stringent than NSPS standard of 7% opacity) and 0.05 grams per dry standard cubic meter. Emissions unit 032 includes a PM limit of 1.0 lb/hr PM and 4.4 TPY PM based on limits included in permit AC20-41427 dated August 4, 1981; 033, 4.0 lbs/hr PM and 17.6 TPY PM based on AC20-41428 dated August 4, 1981; and 036, 1.0 lb/hr PM and 4.4 TPY PM based on AC20-41431 dated August 4, 1981. The construction permit limits are all more stringent than 0.05 grams/dscm (0.022 gr/dscf).

Emissions are controlled by dust collectors, identified as follows:

EU No.	Description	Baghouse
011	Old Roller Mill Fugitive Dust Collector	Micro Pulsaire 1-FS-24 with 240 polyethylene bags
031	FLBD Stock Bin Dust Collector	Flex-Kleen 100-WMW-180 with 180 polyethylene bags
032	Fine Bin FLBD Dust Collector	Flex-Kleen 100-WMWC-120; 120 polyethylene bags
033	No.1A Mill Fugitive Dust Collector	Flex-Kleen 100-WMWC-1080-III Polyester 1080
035	Kiln Fugitive Dust Collector	Flex-Kleen 100-WMW-540 with 540 polyethylene bags
036	Granular Shipping Dust Collector	Flex-Kleen 100-WMW-300 with 300 polyethylene bags

Essential Potential to Emit (PTE) Parameters

C.1. Permitted Capacity. The maximum process throughput rate shall not exceed the following:

EU ID No.	Description	Operation rate	
		TPH	TPY
011	Old Roller Mill Fugitive Dust Collector	14	80,360
031	FLBD Stock Bin Dust Collector	68	595,680
032	Fine Bin FLBD Dust Collector	52	455,520
033	No.1A Mill Fugitive Dust Collector	66	378,840
035	Kiln Fugitive Dust Collector	65	569,400
036	Granular Shipping Dust Collector	45	394,200

[Rules 62-4. 070(3) and 62-210.200(PTE), F.A.C.; and Permit No. 0390005-002-AV]

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C.2. Hours of Operation. These emissions units are allowed to operate continuously, i.e., 8,760 hours/year. However, emissions unit ID No. 011, the Old Roller Mill Fugitive Dust Collector, is limited to 5,740 hours of operation. The permittee shall maintain records of operation of the Old Roller Mill Fugitive Dust Collector. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Permit No. 0390005-002-AV]

C.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

C.4. Visible Emissions: Visible emissions shall not exceed 5% opacity. [Rule 62-297.620(4), F.A.C. and Permit No. 0390005-002-AV]

C.5. Particulate Matter: Particulate matter shall not exceed the following:

EU ID No.	Description	Particulate Matter		
		Limits	Estimated Emissions	
		gr/dscf	lbs/hr	TPY
011	Old Roller Mill Fugitive Dust Collector	0.022	2.6	7.5
031	FLBD Stock Bin Dust Collector	0.022	0.7	2.8
032	Fine Bin FLBD Dust Collector	0.022	1.0	4.4
033	No.1A Mill Fugitive Dust Collector	0.022	4.0	17.6
035	Kiln Fugitive Dust Collector	0.022	5.4	23.5
036	Granular Shipping Dust Collector	0.022	1.0	4.4
		Total	**14.7**	**60.2**

[BACT, 40 CFR 60.672; and Permit Nos. 0390005-018-AC and 0390005-002-AV]

(1) The permittee shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which:
   a. Contain particulate matter in excess of 0.022 gr/dscf; and
   b. Exhibit greater than 5 percent opacity.

(2) If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in B.5.(1) above , or the building enclosing the affected facility or facilities must comply with the following emission limits:
   a. Fugitive emissions from the building openings (except for vents as defined in §60.671) must not exceed 5 percent opacity; and
   b. Vents (as defined in §60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of 40 CFR 60 Subpart OOO.

[40 CFR 60.672(a) and 40 CFR 60.672(e)]

{Permitting Note: The 7% opacity limitation contained in 40 CFR 60.672 is replaced with a 5% opacity limitation at the Permittee's request in accordance with Rule 62-297.620(4) as an alternate PM compliance standard.}

Monitoring of Operations

C.6. The permittee shall maintain a record of baghouse pressure differentials, recording the pressure drops at least at each shift change or every eight hours, whichever is more frequent. [Rule 62-4.070(3), F.A.C.; Permit No. 0390005-002-AV]

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{Permitting Note: The baghouse pressure differential should be within the normal operational range of 0.5" to 5" WG. If the pressure differential is observed outside of the normal operation parameters, appropriate corrective action should be taken immediately.}

Test Methods and Procedures

C.7. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Methods	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C.]

C.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

C.9. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions. The VE test duration shall be 30 minutes. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

C.10. Particulate Matter. Compliance with the particulate matter emission limit may be demonstrated by compliance with the alternative opacity standard of 5%. In the event any emissions unit does not satisfactorily demonstrate compliance with the alternative VE opacity standard, each such emissions unit shall demonstrate compliance with the PM standard by EPA Method 5 within 90 days of the visible emissions test date. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; Permit No. 0390005-002-AV]

{Permitting Note: To demonstrate compliance with the fugitive emission limits for buildings specified in §60.672(e)(1), the owner or operator must complete the testing specified in paragraphs (d)(1) and (2) of §60.675. Initial performance tests must be conducted while all affected facilities inside the building are operating. Initial performance testing for building fugitive emissions required by §60.8 and §60.675 has been completed.}

NSPS Requirements

C.11. 40 CFR 60 Requirements. All requirements of 40 CFR 60, Subpart A - General Provisions, as identified in Table 1 to Subpart OOO of Part 60, and 40 CFR 60 Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants, applicable to this source shall be adhered to. [40 CFR 60.670(a) and Permit No. 0390005-002-AV]

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Granular Clay Fired Equipment Not Subject to NSPS (Baghouses)	
E.U. ID No.	**Brief Description**
030	South Fluid Bed Dryer Dust Collector

This regulated emissions unit consists of natural gas or propane-fired equipment, utilized for the production of granular Attapulgite clay products, was constructed prior to August 31, 1983. The equipment includes collector screws, dryers, burners and product coolers. Emissions are controlled by a product dust collector and dual cyclones, followed by twin baghouses. This emissions unit is not subject to 40 CFR 60 subpart OOO, but is subject to BACT and Compliance Assurance Monitoring (CAM) requirements, and the Permittee has accepted a NOx emissions limit to avoid PSD review.

Emission limits include 5% opacity (original BACT) and limits included in original construction permits. Construction permit AC20-41425, issued August 4, 1981, for the South Fluid Bed Dryer included limits of 4.7 lbs/hr PM. Combustion by-products are subject to a facility-wide BACT limiting NOx emissions to 124 TPY.

The PM emission control equipment is identified as follows:

EU No.	Description	Baghouse
030	South Fluid Bed Dryer Dust Collector	Dust collector followed by dual baghouses consisting of Flex-Kleen 120 WMW 960 with Nomex bags

Essential Potential to Emit (PTE) Parameters

D.1. Permitted Capacity. The maximum process throughput rate and heat input shall not exceed the following:

EU ID No.	Description	Operation Rate (tons processed)		Heat Input
		TPH	TPY	MMBtu/hr
030	South Fluid Dryer Dust Collector	68	595,680	100

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Permit No. 0390005-002-AV]

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

D.3. Methods of Operation (i.e. Fuels). This emissions unit may operate using pipeline quality natural gas or liquid propane. The permittee shall track fuel usage by the emissions unit and facility overall. The permittee shall maintain a log available for Department inspection of the fuel usage, and shall maintain vendor certificates documenting the fuel sulfur content.
[Rules 62-4.070(3) and 62-213.440(1), F.A.C.; and Permit No. 0390005-008-AC]

D.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

D.5. Visible Emissions: Visible emissions shall not exceed 5% opacity. [Rule 62-297.620(4), F.A.C.]

D.6. Particulate Matter: Particulate matter shall not exceed the following:

EU ID No.	Description	Particulate Matter Limit	
		lbs/hr	TPY
030	South Fluid Bed Dryer Dust Collector	4.7	20.6

[BACT; Permit Nos. AC20-41424, AC20-41425 and 0390005-002-AV]

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D.7. Nitrogen Oxide: NOx emissions are limited by Section II, Facility-Wide Condition: Emissions of Nitrogen Oxide. [BACT; and permits AC20-41425 and 0390005-002-AV]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

D.8. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

D.9. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

D.10. Compliance Assurance Monitoring (CAM). This emissions unit is subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [Rule 62-213.440(1)(b)1.a., F.A.C. and 40 CFR 64]

Test Methods and Procedures

D.11. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Methods	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C.]

D.12. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

D.13. Compliance Tests Prior To Renewal. A compliance test for visible emissions shall be performed on each emissions unit once during the permit cycle (every five years), prior to the permit renewal application due date, so the results can be included with the submission of the permit renewal application. The VE test duration shall be 30 minutes. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-210.300(2) and 62-297.310(7)(a)3., F.A.C]; and permits 0390005-015-AC and 0390005-002-AV]

D.14. Particulate Matter. Compliance with PM limits is demonstrated by compliance with the alternative visible emissions standard of 5 percent opacity. In the event the emission unit does not satisfactorily demonstrate compliance with the alternative VE opacity standard, the emission unit shall demonstrate compliance with the PM standard by EPA Method 5 within 90 days of the visible emissions test date. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; and Permit No. 0390005-002-AV]

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D.15. Nitrogen Oxide. Compliance with the NOx limit shall be demonstrated by tracking fuel usage by emissions unit and facility overall. NOx emissions shall be calculated on a quarterly basis using applicable emission factors. However, in the event NOx emissions exceed 62 tons (50% of annual emission limit) at any time during any calendar year, the permittee shall calculate NOx emissions on a monthly basis. In the event NOx emissions exceed 93 tons (75% of annual emission limit) at any time during any calendar year, the permittee shall calculate NOx emissions on a weekly basis unless the maximum potential emissions remaining in the calendar year is less than 124 tons. In the event NOx emissions exceed 112 tons (90% of annual emission limit) and the maximum potential emissions remaining in the calendar year exceeds 124 tons, the permittee shall immediately advise the department of those emergency measures to be taken to ensure compliance with the NOx emissions limit. [Rule 62-4.070(3), F.A.C. and Permit No. 0390005-002-AV]

Recordkeeping and Reporting Requirements

D.16. The permittee is required to submit CAM semi-annual monitoring reports by January 31 and July 31 in accordance with 40 CFR 64.9. [40 CFR 64; and applicant's request (see email dated August 21, 2013).]

Other Requirements

D.17. Determination of Process Variables. See Combined Appendices, Appendix TR.
[Rule 62-297.310(5), F.A.C.]

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Granular Clay Fired Equipment Not Subject to NSPS (Scrubbers)	
E.U. ID No.	**Brief Description**
014	No. 1 Kiln Scrubber
015	No. 2 Kiln Scrubber

These regulated emissions units consist of natural gas or propane-fired kilns, utilized for the production of granular Attapulgite clay products, and were constructed prior to August 31, 1983. These emissions units are not subject to 40 CFR 60 Subpart OOO, but are subject to BACT and Compliance Assurance Monitoring (CAM) requirements, and the Permittee has accepted a NOx emissions limit to avoid PSD review.

Emission limits include 5% opacity (original BACT), and PM limits included in supporting information associated with original construction permit applications (0.017 gr/dscf). Combustion by-products are subject to a facility-wide BACT limiting NOx emissions to 124 TPY.

Emissions are controlled by wet scrubbers identified as follows:

E.U. ID No.	Brief Description	Controls
014	No. 1 Kiln Scrubber	Venturi scrubber
015	No. 2 Kiln Scrubber	Venturi scrubber

Essential Potential to Emit (PTE) Parameters

E.1. Permitted Capacity. The maximum process throughput rate and heat input shall not exceed the following:

EU ID No.	Description	Operation rate (tons processed)		Heat Input
		TPH	TPY	MMBtu/hr
014	No. 1 Kiln Scrubber	16 (wet)	140,160	35
015	No. 2 Kiln Scrubber	28 (wet)	245,280	50
	Total	**44**	**385,440**	**85**

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Permit No. 0390005-002-AV]

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

E.3. Methods of Operation (i.e. Fuels). These emissions units may operate using pipeline quality natural gas or liquid propane. The permittee shall track fuel usage by emissions unit and facility overall. The permittee shall maintain a log available for Department inspection of the fuel usage, and shall maintain vendor certificates documenting the fuel sulfur content. [Rules 62-4.070(3) and 62-213.440(1), F.A.C., and Permit No. 0390005-008-AC]

E.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

E.5. Visible Emissions: Visible emissions shall not exceed 5% opacity. [Rule 62-297.620(4), F.A.C. and Permit No. 0390005-002-AV]

E.6. Particulate Matter: Particulate matter shall not exceed the following:

EU ID No.	Description	Particulate Matter Limit	
		lbs/hr	TPY
014	High Temperature Drying Kiln No. 1	4.2	18.4
015	High Temperature Drying Kiln No. 2	4.4	19.3
	Total	**8.6**	**37.7**

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[BACT; permits AO20-181697 and 0390005-002-AV]

E.7. Nitrogen Oxide. NOx emissions are limited by Section II, Facility-Wide Condition: Emissions of Nitrogen Oxide. [BACT and Permit No. 0390005-002-AV]

Excess Emissions
Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

E.8. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

E.9. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

E.10. Compliance Assurance Monitoring (CAM). These emissions units are subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[Rule 62-213.440(1)(b)1.a., F.A.C. and 40 CFR 64]

Test Methods and Procedures

E.11. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Methods	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C.]

E.12. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

E.13. Compliance Tests Prior To Renewal. A compliance test for visible emissions shall be performed on each emissions unit once during the permit cycle (every five years), prior to the permit renewal application due date, so the results can be included with the submission of the permit renewal application. The VE test duration shall be 30 minutes. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3) and 62-297.310(7)(a)3., F.A.C; and permits 0390005-015-AC and 0390005-002-AV]

E.14. Particulate Matter. Compliance with PM limits is demonstrated by compliance with the alternative visible emissions standard of 5 percent opacity. In the event any emissions unit does not satisfactorily demonstrate compliance with the alternative VE opacity standard, each such emissions unit shall demonstrate compliance with

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the PM standard by EPA Method 5 within 90 days of the visible emissions test date. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

E.15. Nitrogen Oxide. Compliance with the NOx limit shall be demonstrated by tracking fuel usage by emissions unit and facility overall. NOx emissions shall be calculated on a quarterly basis using applicable emission factors. However, in the event NOx emissions exceed 62 tons (50% of annual emission limit) at any time during any calendar year, the permittee shall calculate NOx emissions on a monthly basis. In the event NOx emissions exceed 93 tons (75% of annual emission limit) at any time during any calendar year, the permittee shall calculate NOx emissions on a weekly basis unless the maximum potential emissions remaining in the calendar year is less than 124 tons. In the event NOx emissions exceed 112 tons (90% of annual emission limit) and the maximum potential emissions remaining in the calendar year exceeds 124 tons, the permittee shall immediately advise the department of those emergency measures to be taken to ensure compliance with the NOx emissions limit. [Rule 62-4.070(3) and Permit No. 0390005-002-AV]

Recordkeeping and Reporting Requirements

E.16. The permittee is required to submit CAM semi-annual monitoring reports by January 31 and July 31 in accordance with 40 CFR 64.9. [40 CFR 64 and applicant's request (see email dated August 21, 2013).]

Other Requirements

E.17. Determination of Process Variables. See Combined Appendices, Appendix TR.
[Rule 62-297.310(5), F.A.C.]

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Gel Clay Fired Equipment Not Subject to NSPS (Scrubbers)	
E.U. ID No.	**Brief Description**
002	No. 4A Mill Scrubber
008	No. 4 Mill Scrubber
019	No. 4B Mill Scrubber

These regulated emissions units consist of natural gas or propane-fired hammermills, utilized for the production of gel Attapulgite clay products, and were constructed prior to August 31, 1983. These emissions units are not subject to 40 CFR 60 Subpart OOO, but are subject to BACT and to Compliance Assurance Monitoring (CAM) requirements, and the Permittee has accepted a NOx emissions limit to avoid PSD review.

Emission limits include 5% opacity (original BACT), and PM limits included in supporting information associated with original construction permit applications. Combustion by-products are subject to a facility-wide BACT limiting NOx emissions to 124 TPY.

Emissions are controlled by wet scrubbers identified as follows:

E.U. ID No.	Brief Description	Controls
002	No. 4A Mill Scrubber	Stansteel venturi-impactor type, high efficiency scrubber model D
008	No. 4 Mill Scrubber	Stansteel venturi-impactor type, high efficiency scrubber model D
019	No. 4B Mill Scrubber	Stansteel venturi-impactor type, high efficiency scrubber model D

Essential Potential to Emit (PTE) Parameters

F.1. Permitted Capacity. The maximum process throughput rate and heat input shall not exceed the following:

EU ID No.	Description	*Maximum Process Throughput Rate (Dry Basis)		Maximum Heat Input Rate
		TPH	TPY	MMBtu/hr
002	No. 4A Mill Scrubber	13	113,880	30
008	No. 4 Mill Scrubber	13	113,880	30
019	No. 4B Mill Scrubber	13	113,880	30
	Total	**39**	341,640	90

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Permit No. 0390005-002-AV]
{Permitting Note: Maximum process throughput rate is on a dry basis. A throughput rate of 13 TPH and 113,880 TPY on a dry basis equates to 20 TPH and 175,200 TPY on a wet basis.}

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

F.3. Methods of Operation (i.e. Fuels). These emissions units may operate using pipeline quality natural gas or liquid propane. The permittee shall track fuel usage by emissions unit and facility overall. The permittee shall maintain a log available for Department inspection of the fuel usage, and shall maintain vendor certificates documenting the fuel sulfur content. [Rules 62-4.070(3) and 62-213.440(1), F.A.C.; and Permit No. 0390005-008-AC]

F.4. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

F.5. Visible Emissions: Visible emissions shall not exceed 5% opacity. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

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F.6. Particulate Matter: Particulate matter shall not exceed the following:

EU ID No.	Description	Particulate Matter Limits	
		lbs/hr	TPY
002	4A Mill Scrubber	7.0	30.7
008	4 Mill Scrubber	7.0	30.7
019	4B Mill Scrubber	7.0	30.7
	TOTAL:	**21.0**	**92.1**

[BACT; and permits AO20-181688 and 0390005-002-AV]

F.7. Nitrogen Oxide: NOx emissions are limited by Section II, Facility-Wide Condition: Emissions of Nitrogen Oxide. [BACT and Permit No. 0390005-002-AV]

Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision.

F.8. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. [Rule 62-210.700(1), F.A.C.]

F.9. Excess Emissions Prohibited. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

Monitoring of Operations

F.10. Compliance Assurance Monitoring (CAM). These emissions units are subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[Rule 62-213.440(1)(b)1.a., F.A.C. and 40 CFR 64]

Test Methods and Procedures

F.11. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Methods	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C.]

F.12. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

F.13. Compliance Tests Prior To Renewal. A compliance test for visible emissions shall be performed on each emissions unit once during the permit cycle (every five years), prior to the permit renewal application due date, so

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the results can be included with the submission of the permit renewal application. The VE test duration shall be 30 minutes. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3), 62-210.300(2) and 62-297.310(7)(a)3., F.A.C; and permits 0390005-015-AC and 0390005-002-AV]

F.14. Particulate Matter. Compliance with PM limits is demonstrated by compliance with the alternative visible emissions standard of 5 percent opacity. In the event any emissions unit does not satisfactorily demonstrate compliance with the alternative VE opacity standard, each such emissions unit shall demonstrate compliance with the PM standard by EPA Method 5 within 90 days of the visible emissions test date. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.]

F.15. Nitrogen Oxide. Compliance with the NOx limit shall be demonstrated by tracking fuel usage by emissions unit and facility overall. NOx emissions shall be calculated on a quarterly basis using applicable emission factors. However, in the event NOx emissions exceed 62 tons (50% of annual emission limit) at any time during any calendar year, the permittee shall calculate NOx emissions on a monthly basis. In the event NOx emissions exceed 93 tons (75% of annual emission limit) at any time during any calendar year, the permittee shall calculate NOx emissions on a weekly basis unless the maximum potential emissions remaining in the calendar year is less than 124 tons. In the event NOx emissions exceed 112 tons (90% of annual emission limit) and the maximum potential emissions remaining in the calendar year exceeds 124 tons, the permittee shall immediately advise the department of those emergency measures to be taken to ensure compliance with the NOx emissions limit. [Rule 62-4.070(3), F.A.C. and Permit No. 0390005-002-AV]

Recordkeeping and Reporting Requirements

F.16. The permittee is required to submit CAM semi-annual monitoring reports by January 31 and July 31 in accordance with 40 CFR 64.9. [40 CFR 64; Rules 62-204.800(12) F.A.C. and per applicants request (see email dated August 21, 2013)]

Other Requirements

F.17. Determination of Process Variables. See Combined Appendices, Appendix TR. [Rule 62-297.310(5), F.A.C.]

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The specific conditions in this section apply to the following emissions units:

ACM Milling Equipment Subject to NSPS (Baghouses)		
E.U. ID No.	**Emission Point (Stack)**	**Brief Description**
038	EP 37	100 Feed Bin Dust Collector
	EP 38	800 Bin Vent
	EP 39	SFG ACM Mill Product Dust Collector
	EP 40	No.1 Classifier 150 Bin Vent
	EP 41a	Product 400 Bin Vent
	EP 41b	Product 405 Bin Vent
	EP 41c	Product 410 Bin Vent
	EP 41d	Product 600 Bin Vent
	EP 41e	Product 700 Bin Vent
	EP 42	No. 4 Truck Loading Bin Vent
	EP 43	SFG RLO Dust Collector
	EP 44	SFG Bagging Dust Collector
	EP 46	3 Dock Bagging Dust Collector
	EP 54	No. 5 Load Out Bin Vent
Ultra Fine Grind Equipment Subject to NSPS (Baghouses)		
039	EP-48	Receiver 200 Bin Vent
	EP-49	No. 1 FEM Dust Collector
	EP-50	No. 2 FEM Dust Collector
	EP-53	No. 2 Classifier 300 Bin Vent
	EP-55	CGS RLO Dust Collector
	EP-56	Product Bin 151

These regulated emissions units consist of gel Attapulgite clay production equipment constructed after August 31, 1983. The equipment includes conveyors, classifiers, storage bins, bag packers and emissions from miscellaneous fugitive sources subject to 40 CFR 60 Subpart OOO.

These emissions units are subject to the requirements in 40 CFR 60.672(a). Operations enclosed in a building are subject to the requirements in 40 CFR 60.672(e). The facility has requested the alternate VE standard of 5% opacity in accordance with Rule 62-297.620(4), F.A.C., to demonstrate compliance with the PM limits, which is more stringent than the limits in 40 CFR 60.672.

Construction Permit No. 0390005-009-AC allowed for an additional gel load spout to facilitate flexibility of loading products produced at the plant into railcars.

Construction Permit No. 0390005-011-AC allowed for debottlenecking construction activities in emissions unit 038 and 039 (ACM Milling and Ultra Fine Grind), to allow simultaneous production of different products.

Construction Permit No. 0390005-018-AC authorized the installation of a portable bulk bag reclamation system that affected emissions points 38, 54 (EU 038) and 48 (EU 039).

Emission limits include 5% opacity from the construction permits (0390005-009 AC issued November 9, 2004, and 0390005-011-AC issued April 19, 2005, both more stringent than NSPS standard of 7% opacity) and 0.05 grams per dry standard cubic meter (0.022 gr/dscf).

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Emissions are controlled by dust collectors, identified as follows:

EU	Stack	Description	Baghouse
038	37	100 Feed Bin Dust Collector	Flex-Kleen 100-WSWS-81-IIIG; 81 polyethylene bags
	38	800 Bin Vent	Flex-Kleen 100-WSWS-49-IIG; 49 polyethylene bags
	39	SFG ACM Mill Prod Dust Collector	Flex-Kleen 100-WSWC-361-IIIG; 361 polyethylene bags
	40	No.1 Classifier 150 Bin Vent	Flex-Kleen 84-BVBS-36IIG; 36 polyethylene bags
	41a	Product 400 Bin Vent	Flex-Kleen 100-WSWS-49-IIG; 49 polyethylene bags
	41b	Product 405 Bin Vent	Flex-Kleen 84-BVBS-9-IIG; 9 polyethylene bags
	41c	Product 410 Bin Vent	Flex-Kleen 84-BVBS-25-IIG; 25 polyethylene bags
	41d	Product 600 Bin Vent	Flex-Kleen 100-WSWS-49-IIG; 49 polyethylene bags
	41e	Product 700 Bin Vent	Flex-Kleen 84-BVBS-25-IIG; 25 polyethylene bags
	42	No. 4 Truck Loading Bin Vent	Flex-Kleen 84-BVBS-25-IIG; 25 polyethylene bags
	43	SFG RLO Dust Collector	DCL CD25-84 polyester 25
	44	SFG Bagging Dust Collector	Flex-Kleen 100-WSWS-49-IIG polyester 49
	46	3 Dock Bagging Dust Collector	Ultra RW-192-100; 192 polyethylene bags
	54	No. 5 Load Out Bin Vent	Flex-Kleen 84-BVBS-25-IIG; 25 polyethylene bags
039	48	Receiver 200 Bin Vent	Flex-Kleen 100-WSWS-64-II; 64 polyethylene bags
	49	No. 1 FEM Dust Collector	Flex-Kleen 84-CTBS-74-IIG; 74 polyethylene bags
	50	No. 2 FEM Dust Collector	Flex-Kleen 84-CTBS-74-IIG; 74 polyethylene bags
	53	No. 2 Classifier 300 Bin Vent	Flex-Kleen 84-BVBS-25-IIG; 25 polyethylene bags
	55	CGS RLO Dust Collector	Torit 36-PJD-6-reverse jet; 36 polypropylene bags
	56	Product Bin 151	Flex-Kleen 84-BVBS-25-IIG; 25 polyethylene bags

Essential Potential to Emit (PTE) Parameters

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G.1. Permitted Capacity. The maximum process throughput rate shall not exceed the following:

EU No.	Emission Point	Description	Operation rate	
			TPH	TPY
038	37	100 Feed Bin Dust Collector	20	146,000
	38	800 Bin Vent	20	146,000
	39	SFG ACM Mill Product Dust Collector	20	146,000
	40	No.1 Classifier 150 Bin Vent	20	160,000
	41a	Product 400 Bin Vent	20	80,000
	41b	Product 405 Bin Vent	20	120,000
	41c	Product 410 Bin Vent	20	120,000
	41d	Product 600 Bin Vent	20	80,000
	41e	Product 700 Bin Vent	20	80,000
	42	No. 4 Truck Loading Bin Vent	20	20,000
	43	SFG RLO Dust Collector	20	20,000
	44	SFG Bagging Dust Collector	20	160,000
	46	3 Dock Bagging Dust Collector	20	80,000
	54	No. 5 Load Out Bin Vent	20	80,000
		EU-038 Total:	280	1,438,000
039	48	Receiver 200 Bin Vent	30	240,000
	49	No. 1 FEM Dust Collector	4.2	16,800
	50	No. 2 FEM Dust Collector	4.2	16,800
	53	No. 2 Classifier 300 Bin Vent	20	80,000
	55	CGS RLO Dust Collector	20	80,000
	56	Product Bin 151	20	80,000
		EU-039 Total:	98.4	513,600
		Grand Total (EU-038 plus EU-039):	**378.4**	**1,951,600**

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and permits 0390005-009-AC, 0390005-011-AC, 0390005-002-AV, and 0390005-020-AC]

G.2. Hours of Operation. These emissions units and points are limited to the following hours of operation:

EU No.	Emission Point	Description	Allowable Hours of Operation per Year
038	37	100 Feed Bin Dust Collector	7300
	38	800 Bin Vent	7300
	39	SFG ACM Mill Prod Dust Collector	7300
	40	No.1 Classifier 150 Bin Vent	8000
	41a	Product 400 Bin Vent	4000
	41b	Product 405 Bin Vent	6000
	41c	Product 410 Bin Vent	6000
	41d	Product 600 Bin Vent	4000
	41e	Product 700 Bin Vent	4000

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	42	No. 4 Truck Loading Bin Vent	1000
	43	SFG RLO Dust Collector	1000
	44	SFG Bagging Dust Collector	8000
	46	3 Dock Bagging Dust Collector	4000
	54	No. 5 Load Out Bin Vent	4000
039	48	Receiver 200 Bin Vent	8000
	49	No. 1 FEM Dust Collector	4000
	50	No. 2 FEM Dust Collector	4000
	53	No. 2 Classifier 300 Bin Vent	4000
	55	CGS RLO Dust Collector	4000
	56	Product Bin 151	4000

The permittee shall maintain a log documenting the hours of operation of each emission point. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and permits 0390005-008-AC, 0390005-009-AC; 0390005-011-AC, 0390005-018-AC, 0390005-002-AV, and 0390005-020-AC]

G.3. Emissions Unit Operating Rate Limitation After Testing. See the related testing provisions in Appendix TR, Facility-wide Testing Requirements. [Rule 62-297.310(2), F.A.C.]

Emission Limitations and Standards

G.4. Visible Emissions: Visible emissions shall not exceed 5% opacity. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; and permits 0390005-009-AC, 0390005-011-AC and 0390005-002-AV]

G.5. Particulate Matter: Particulate matter for each emission point shall not exceed the following:

EU No.	Emission Point	Description	Particulate Matter Limits gr/dscf	Estimated Emissions lbs/hr	Estimated Emissions TPY
038	37	100 Feed Bin Dust Collector	0.022	0.7	2.4
	38	800 Bin Vent	0.022	0.4	1.5
	39	SFG ACM Mill Product Dust Collector	0.022	2.2	7.9
	40	No.1 Classifier 150 Bin Vent	0.022	0.3	0.9
	41a	Product 400 Bin Vent	0.022	0.4	0.9
	41b	Product 405 Bin Vent	0.022	0.1	0.2
	41c	Product 410 Bin Vent	0.022	0.2	0.6
	41d	Product 600 Bin Vent	0.022	0.5	0.9
	41e	Product 700 Bin Vent	0.022	0.2	0.4
	42	No. 4 Truck Loading Bin Vent	0.022	0.2	0.1
	43	SFG RLO Dust Collector	0.022	0.2	0.1
	44	SFG Bagging Dust Collector	0.022	0.3	0.9
	46	3 Dock Bagging Dust Collector	0.022	1.3	2.6
	54	No. 5 Load Out Bin Vent	0.022	0.2	0.4
			EU-038 Total:	*7.2*	*19.8*
039	48	Receiver 200 Bin Vent	0.022	0.6	2.3
	49	No. 1 FEM Dust Collector	0.022	0.4	0.8

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	50	No. 2 FEM Dust Collector	0.022	0.4	0.8
	53	No. 2 Classifier 300 Bin Vent	0.022	0.2	0.3
	55	CGS RLO Dust Collector	0.022	0.2	0.4
	56	Product Bin 151	0.022	0.1	0.2
			EU-039 Total:	*1.9*	*4.8*
			Grand Total (EU-038 plus EU-039):	**9.1**	**24.6**

[40 CFR 60.672; and permits 0390005-009-AC, 0390005-011-AC, 0390005-018-AC and 0390005-002-AV; and 0390005-020-AC]

(1) The permittee shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which:
   a. Contain particulate matter in excess of 0.022 gr/dscf; and
   b. Exhibit greater than 5 percent opacity.

(2) If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in B.5.(1) above , or the building enclosing the affected facility or facilities must comply with the following emission limits:
   a. Fugitive emissions from the building openings (except for vents as defined in §60.671) must not exceed 5 percent opacity; and
   b. Vents (as defined in §60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of 40 CFR 60 Subpart OOO.

[40 CFR 60.672(a) and 40 CFR 60.672(e)]

{Permitting Note: The 7% opacity limitation contained in 40 CFR 60.672 is replaced with a 5% opacity limitation at the Permittee's request in accordance with Rule 62-297.620(4) as an alternate PM compliance standard.}

Monitoring of Operations

G.6. The permittee shall maintain a record of baghouse pressure differentials, recording the pressure drops at least at each shift change or every eight hours, whichever is more frequent. [Rule 62-4.070(3), F.A.C.; Permit No. 0390005-002-AV]

{Permitting Note: The baghouse pressure differential should be within the normal operational range of 0.5" to 5" WG. If the pressure differential is observed outside of the normal operation parameters, appropriate corrective action should be taken immediately.}

Test Methods and Procedures

G.7. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Methods	Description of Method and Comments
5	Determination of Particulate Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rule 62-297.401, F.A.C.]

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G.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

G.9. Annual Compliance Tests Required. During each federal fiscal year (October 1st to September 30th), each emissions unit shall be tested to demonstrate compliance with the emissions standards for visible emissions. The VE test duration shall be 30 minutes. Notification of compliance testing and completed test reports may be submitted by electronic mail to nwdair@dep.state.fl.us. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.; and permits 0390005-018-AC and 0390005-002-AV]

G.10. Particulate Matter. Compliance with the particulate matter emission limit may be demonstrated by compliance with the alternative opacity standard of 5%. In the event any emissions unit does not satisfactorily demonstrate compliance with the alternative VE opacity standard, each such emissions unit shall demonstrate compliance with the PM standard by EPA Method 5 within 90 days of the visible emissions test date. [Rules 62-4.070(3) and 62-297.620(4), F.A.C.; Permit No. 0390005-002-AV]

{Permitting Note: To demonstrate compliance with the fugitive emission limits for buildings specified in §60.672(e)(1), the owner or operator must complete the testing specified in paragraphs (d)(1) and (2) of §60.675. Initial performance tests must be conducted while all affected facilities inside the building are operating. Initial performance testing for building fugitive emissions required by §60.8 and §60.675 has been completed.}

NSPS Requirements

G.11. 40 CFR 60 Requirements. All requirements of 40 CFR 60, Subpart A - General Provisions, as identified in Table 1 to Subpart OOO of Part 60, and 40 CFR 60 Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants, applicable to this source shall be adhered to. [40 CFR 60.670(a) and Permit No. 0390005-002-AV]

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<u>The Following Appendices Are Enforceable Parts of This Permit</u>:

Combined Appendices:
Appendix A, Abbreviations, Acronyms, Citations, and Identification Numbers
- Appendix I, List of Insignificant Emissions Units and/or Activities
- Appendix RR, Facility-wide Reporting Requirements
- Appendix TR, Facility-wide Testing Requirements
- Appendix TV, Title V General Conditions
- Appendix U, List of Unregulated Emissions Units and/or Activities
- Appendix CAM – General Requirements
- Appendix CAM Plan Revised 6-23-2014
- Startup and Shutdown Plan
- 40 CFR 60 Subpart OOO – NSPS for Nonmetallic Mineral Processing Plants

<u>The following attachments are included for convenient reference:</u>

Referenced Attachments:
- Figure 1, Summary Report-Gaseous and Opacity Excess Emission and Monitoring System Performance
- Table H, Permit History
- Time Sensitive Action Chart

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