

FINAL DETERMINATION

FOR

Cemex Cement of Louisiana, Inc.

Hillsborough County

Air Construction Permit

Application Number

0570031-017-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

April 18, 2013

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on March 26, 2013 that included an Intent to Issue Air Construction Permit No. 0570031-017-AC to Cemex Cement of Louisiana, Inc. The facility is located at 3417 Port Sutton Road, Tampa, Hillsborough County, FL 33619. The air construction permit authorizes the installation of aeration conveyors in order to transfer cement materials from the silos to a ship. Also, this permit will allow the facility the ability to pneumatically unload cement materials directly from trucks to ships.

The Public Notice of Intent to Issue was published in The Times, an edition of the Tampa Bay Times on April 3, 2013.

COMMENTS/CHANGES

On March 27, 2013, comments were received via email from Max Lee, P.E. of Koogler and Associates, Inc. on behalf of Cemex Cement of Louisiana, Inc. Listed below is each comment and a response to each in the order that the comment was received. The comment(s) will not be restated but are summarized. Where duplicative comments exist, the original response is referenced. No comments were received from the public.

Comment No. 1: In III. Summary of Emissions for Emission Units Modified of the Technical Evaluation, make the following changes:

- Change the title of the third column from Allowable/Potential PM Emissions (TPY) to Current Allowable/Potential PM Emissions (TPY) and change the emissions to reflect that the current allowable limit in Cemex's operating permit is based on a flowrate of 7,400 DSCFM for EU No. 010.
- Change the title of the fourth column from Actual Emissions Increase (TPY) to Future Allowable/Potential PM Emissions (TPY) and change the emissions to reflect the allowable/potential emissions due to this project.
- Change the fourth bullet to clarify that the Future Allowable/Potential PM Emissions (TPY) from EU No. 010 are based on the grain loading standard of 0.03 gr/dscf, an airflow rate of 7,900 dscfm, and 8,760 hours of operation for the packing operation or ship loading.

Response: In order to clarify the table, the following changes are made.

To:

III. Summary of Emissions for Emission Units Modified

Emission Unit	Current Actual PM Emissions (TPY)	Future Potential PM Emissions (TPY)	Allowable PM Emissions
010 - Cement Materials Transfer and Packing	0.7 (from Packing Operation)	8.9	0.03 gr/dscf
029 - Cement Materials Loading into Ships	NA	24.8	0.03 gr/dscf

- The actual PM emissions are based on the average of 2010 and 2011 AOR data.
- Future Potential PM emissions from EU No. 010 are based on the grain loading standard of 0.03

gr/dscf, an airflow rate of 7,900 dscfm, and 8,760 hours of operation.

- The Future Potential PM Emissions for EU No. 029 are based on the grain loading standard of 0.03 gr/dscf, an average airflow rate of 48,179 dscfm, and 4,000 hours of operation. However, the facility is not limited to operating a shipboard baghouse system that is rated at 48,179 dscfm or less.

Comment No. 2: In Specific Condition No. 8.B), change the condition to state that only the ship loading from trucks operation is limited to operating 4,000 hours/year.

Response: On Page 2 of Attachment 1 of the permit application, it states that this permit application is to allow the facility to load material into ships, from either trucks or silos. Also, on Page 3 of Attachment 1, in paragraphs 4 and 6, it states that PM emissions from the ship's loading operation are controlled by onboard baghouse(s). Based on the application, the ship loading operation is limited to operating 4,000 hours/year whether ships are loaded from trucks or from silos. Therefore, since the PM potential emissions associated with this activity was based on the ship's baghouse system grain loading of 0.03 gr/dscf and 4,000 hours/year, the requested change is not made.

Comment No. 3: In Specific Condition No. 13.D), remove "In order to verify 100% capture for the shiphold".

Response: The Method 22 requirement was included in the permit to provide reasonable assurance per Rule 62-4.070(3), F.A.C. that all of the ship loading emissions will be vented through the ship baghouse and that the emissions will not escape through vents or openings in the ship's hold. However, in order to clarify the rationale for requiring the Method 22 test, the language is changed as follows.

From:

In order to verify 100% capture for the shiphold, perform a Method 22 test on the shiphold, each time the ship is loaded at the facility.

To:

A daily visible emission observation shall be performed and recorded on any dates that material is loaded into ships to provide reasonable assurance of continued compliance with the opacity standard. The observations should be an instantaneous reading during active material transport into the shiphold using EPA Method 22 procedures. If visible emissions are observed, loading shall cease and immediate action to correct any problems shall be taken. A daily log of all instantaneous visible emissions observations shall be maintained. The log shall contain all instances of visible emissions and action taken to correct the problem(s).

Comment No. 4: In Specific Condition No. 22., change the condition to require that a permit application be submitted 60 days of completion all of the ship loading compliance tests.

Response: The condition was written to require a permit application to be submitted within 60 days of completion of the first ship loading compliance test, whether testing is performed when loading ships by truck or silos, because it is expected that the facility will primarily use one of the ship loading methods. A compliance plan can be included in the operating permit if the VE testing for the second ship loading method is not able to be performed prior to the requirement to submit an operating permit application. In order to ensure that the facility applies for an operating permit once the ship loading operation begins operation, the requested change is not made.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit with the changes noted above.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF PERMIT

Jose De La Garza
VP Logistics – East Region
Cemex Cement of Louisiana, Inc.
1501 Belvedere Rd.
West Palm Beach, FL 33406

Re: Hillsborough County - AP

Dear Mr. De La Garza:

Enclosed is Permit Number 0570031-017-AC to install aeration conveyors in order to transfer cement materials from the silos to a ship. Also, this permit will allow the facility the ability to pneumatically unload cement materials directly from trucks to ships, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, FL 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

Cemex Cement of Louisiana, Inc.
West Palm Beach, FL 33406

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cc: Florida Department of Environmental Protection (via email)
Maxwell Lee, P.E. – Koogler and Associates, Inc. (via email)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated clerk, receipt of which is hereby acknowledged.

Clerk

Date

PERMITTEE:
Cemex Cement of Louisiana, Inc.
3417 Port Sutton Road
Tampa, FL 33619

PERMIT/CERTIFICATION
Permit No.: 0570031-017-AC
County: Hillsborough
Expiration Date: September 1, 2014
Project: Ship Loading

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. 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 EPC and made a part hereof and specifically described as follows:

This project is for the installation of aeration conveyors (i.e., airslides) in order to transfer cement materials from the silos to a ship at a cement materials handling facility. Cemex just recently purchased this facility from Holcim (US), Inc. In addition, this permit will allow the facility the ability to pneumatically unload cement materials directly from trucks to ships. Previously, trucks were only allowed to do this operation into the silos.

Currently, cement materials are received at the facility by ship, railcar, or truck and pneumatically unloaded into eleven storage silos. When the cement materials are ready to be loaded out, they are either packaged into bags using an automated packing machine, the Haver Roto Packer, Model 8(6) RSE-U or loaded into trucks using two loading bays with four loading spouts.

In this project, the facility will modify the existing equipment and will add a total of four airslides, each approximately 10 feet in length, which will tie into the current EU No. 010 for the cement packaging operation. The airslides will allow material to be diverted from the two existing screw conveyors which currently direct material from the silos to two bucket elevators, then to the packing system hopper, and then into the packer. Two of the air slides will divert the material from the screw conveyors and direct the material to the existing railcar unloading hopper. An additional two airslides will divert the material from the screw conveyors and direct the material into a second hopper that the facility will construct in order to facilitate ship loading. Using the existing electric cement pump and a second electric cement pump that will be constructed along with the second hopper, the material from both hoppers will be pneumatically transferred to the existing input/output piping that will feed material into a totally enclosed ship. The movement of the cement material onto the ship will be powered by the facility's current electric-power pumping systems.

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SPECIFIC CONDITIONS:

1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]
2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]
4. The permittee shall not cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), F.A.C.]
5. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited, pursuant to the Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.
6. The potential and allowable emissions for each emission unit shall not exceed the following: [Rule 62-296.711(2), F.A.C.]

<u>EU(s)</u>	<u>Description</u>	<u>DSCFM</u>	<u>Pollutant</u>	<u>Tons/ Yr</u>	<u>Emission Limitation</u>
010	Cement Materials Transfer and Packing	7,900	PM	8.9	0.03 grains/dscf
029	Cement Materials Loading into Ships	--	PM	--	0.03 grains/dscf

7. The permittee shall not cause, permit, or allow any visible emissions (five percent opacity) from each baghouse/dust collector exhaust, shiphold, silo, or any other activity at the facility. [Rule 62-296.711(2)(a), F.A.C. and Chapter 1-3.52, Rules of the EPC]
8. In order to ensure compliance with Specific Condition Nos. 6 and 7, the following restrictions and limitations shall apply facility-wide per twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit No. 0570031-013-AC]
 - A) The maximum throughput shall not exceed 600,000 tons of cement materials*.
 - B) The hours of operation for the ship loading operation shall not exceed 4,000 hours.
 - C) The hours of operation for the cement materials packaging operation are not limited.
 - D) The dust collectors controlling the sources under this permit shall be kept in good repair.

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* For the purpose of this permit, cement materials shall be defined as Type I cement, Type II cement, and blended cement products that consist of a combination of one or more of the following: ground granulated blast furnace slag, flyash, silica, calcined clay, other pozzolans, and hydrated lime.

8. In order to ensure compliance with Specific Condition Nos. 6 and 7, the following restrictions and limitations shall apply per twelve consecutive month period.: [Rule 62-4.070(3), F.A.C. and Permit Nos. 0570031-001-AC, 0570031-011-AC, and 0570031-013-AC]

- A) The maximum transfer rate into ships, whether material is transferred to the ship from silos or from trucks, shall not exceed 300 tons per hour.
- B) The ship loading operation shall only occur on ships that are equipped with a baghouse system.
- C) During the truck loading operation, the permittee shall ensure that the ship's onboard baghouse system will have the capability to handle the volume of air displaced from all the trucks that will simultaneously load into a ship.
- D) The maximum packing rate of the cement packer shall not exceed 65 tons per hour.
- E) Particulate matter emissions from each operation shall be vented to the corresponding baghouse/dust collector(s) as designated in Specific Condition No. 6. The baghouse/dust collector shall be operating while each corresponding operation is occurring.
- F) All silo loading activities shall be accomplished using pneumatic transfer systems.

9. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following: [Rules 62-296.320(4)(c) and 62-4.070(3), F.A.C.]

- A) Paving and maintenance of roads, parking areas, and yards
- B) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing
- C) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities
- D) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne
- E) Landscaping or planting of vegetation
- F) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter. Confining abrasive blasting where possible
- G) Enclosure or covering of conveyor systems
- H) Limit vehicular traffic to 10 MPH

10. Each baghouse/dust collector permanently located at the facility shall have a device installed

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capable of monitoring the pressure drop in inches of water across the control device. These devices shall be maintained in working order. [Rules 62-4.070(3) and 62-297.310(5)(b), F.A.C.]

11. The permittee shall not allow any person to circumvent any pollution control device nor allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

12. In order to demonstrate compliance with Specific Condition Nos. 6, 7, and 8 the permittee shall maintain records for the most recent three year period. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rule 62-4.160(14), F.A.C.]

- A) Month, Year
- B) Amount of cement materials unloaded from ships, railcars, or trucks (tons)
- C) Amount of cement materials loaded into trucks or ships (tons)
- D) Amount of cement materials packed into bags (tons)
- E) Hours of operation for each emission unit
- F) Rolling twelve month total of B) through E) above (tons or hours)

13. Test each of the following ship loading scenarios for opacity (baghouse/dust collector exhaust and shiphold) upon the first instance of material loadout to the ship using each loading scenario, and annually thereafter. The EPA Method 9 test observation period on these sources shall be at least thirty (30) minutes in duration. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-297.310, F.A.C. and 62-4.070(3), F.A.C.]

- A) Ship loading from silos (EU Nos. 010 and 029)
- B) Ship loading from trucks (EU No. 029)
- C) The maximum number of trucks that can simultaneously offload cement materials into a ship shall be established during the initial visible emissions test for ship loading from trucks (EU No. 029). This number can be increased, not to exceed sixteen (16) trucks, by conducting a new visible emissions test that demonstrates compliance with the 5% opacity standard.
- D) A daily visible emission observation shall be performed and recorded on any dates that material is loaded into ships to provide reasonable assurance of continued compliance with the opacity standard. The observations should be an instantaneous reading during active material transport into the shiphold using EPA Method 22 procedures. If visible emissions are observed, loading shall cease and immediate action to correct any problems shall be taken. A daily log of all instantaneous visible emissions observations shall be maintained. The log shall contain all instances of visible emissions and action taken to correct the problem(s).

14. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined

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as 90-100% of the rated capacity of loading 300 tons/hour of cement materials into ships. If it is impracticable to test at capacity, then the source 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, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the EPC. Failure to submit the ship's baghouse system flowrate, the throughput loading rates, the number of trucks loading the ship, and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

15. Compliance with the emission limitations of Specific Condition Nos. 6 and 7 shall be determined using EPA Method 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rule 62-297.310, F.A.C.]

16. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

17. The maximum allowable emission rate for particulate matter for this source is set by Specific Condition No. 6. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Environmental Protection Commission of Hillsborough County pursuant to the authority granted under Rule 62-297.620(4), F.A.C. hereby allows the particulate testing to be waived in lieu of a visible emissions test not to exceed 5% opacity. [62-297.620(4), F.A.C.]

18. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests with the particulate emission standards which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rule 62-297.310(7)(b), F.A.C.]

19. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200 - Modification, F.A.C. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.

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20. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

21. Submit to the Environmental Protection Commission of Hillsborough County each calendar year on or before April 1, completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility", for the preceding calendar year. [Rule 62-210.370(3), F.A.C.]

22. A minimum of two copies of an air operating permit application shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the first ship loading compliance test, whether testing is performed when loading ships by truck or silos, or at least 90 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

