M E M O R A N D U M

DATE: December 10, 2013

TO: Richard D. Garrity, Ph.D.

FROM: Lora Webb THRU: Diana M. Lee, P.E.
Sterlin K. Woodard, P.E.

SUBJECT: Final Construction Permit – James Hardie Building Products, Inc.
Permit No. 0570460-030-AC

Attached is Final Permit No. 0570460-030-AC for an in-kind replacement of the existing baghouse associated with EU No. 023 – Cement Silo No. 1 at a cement fiber product manufacturing facility. Emissions from this silo are currently controlled by a 1,000 DSCFM, Lakeland Design, Inc., Model No. 84-BVTS-64, baghouse. According to the applicant, this baghouse will be replaced with an equivalent baghouse. The cement stored in this silo is received by truck and pneumatically unloaded into a storage silo. When needed in production, the cement is transferred pneumatically from the silo to the production equipment.

The facility published the Public Notice in the Plant City Courier and Tribune on November 20, 2013. No comments were received from the public or from the facility.

Based upon our review of the application, we recommend approval of the attached permit as drafted.

LAW: 0570460-030-AC

FINAL DETERMINATION

FOR

JAMES HARDIE BUILDING PRODUCTS, INC.

Hillsborough County

Construction Permit

Application Number

0570460-030-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

December 10, 2013

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on November 8, 2013 that included an Intent to Issue Air Construction Permit No. 0570460-030-AC to James Hardie Building Products, Inc. The facility is located at 809 South Woodrow Wilson Road, Plant City, Hillsborough County, FL 33566. The air construction permit authorizes an in-kind replacement of the existing baghouse associated with EU No. 023 – Cement Silo No. 1.

The Public Notice of Intent to Issue was published in the Plant City Courier and Tribune on November 20, 2013.

COMMENTS/CHANGES

No comments were received from the applicant or the public.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted.

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ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Scott Monahan
Plant Manager
James Hardie Building Products, Inc.
809 South Woodrow Wilson Road
Plant City, FL 33566

Dear Mr. Monahan:

Enclosed is Permit Number 0570460-030-AC for an in-kind replacement of the existing baghouse associated with EU No. 023 – Cement Silo No. 1, 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 Dr, 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.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

cc: Florida Department of Environmental Protection, Southwest District (via e-mail)
Kenneth E. Given, P.E., Clean Air Consulting, Inc.
Jim Estler, Q.E.P., Clean Air Consulting, Inc. (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT and all copies were mailed before the close of business on _____ to the listed persons.

Clerk Stamp
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:	PERMIT/CERTIFICATION
James Hardie Building Products, Inc.	Permit No.: 0570460-030-AC
809 South Woodrow Wilson Road	County: Hillsborough
Plant City, FL 33566	Expiration Date: December 1, 2014
	Project: Cement Silo Baghouse Replacement

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 permit authorizes an in-kind replacement of the existing baghouse associated with EU No. 023 – Cement Silo No. 1 at a cement fiber product manufacturing facility.. The facility's operations include two distinct operations: building panel production (sheet plant) and large drainage pipe production (pipe plant). Raw materials (sand, cement, wood pulp, and additives) are transported on-site by railcars and trucks, stored in silos, and then transferred into the plant(s). The products are then wet-mixed and formed into the desired shapes. The products are stacked for cooling and cured, coated if necessary, and then packaged for transport off-site.

The cement is received by truck and pneumatically unloaded into a storage silo. Emissions from this silo are controlled by an existing 1,000 DSCFM, Lakeland Design, Inc., Model No. 84-BVTS-64, baghouse. This baghouse will be replaced with an equivalent baghouse. When needed in production, the cement is transferred pneumatically from the silo to the production equipment thru 3 receiving hoppers. As an alternative to cement silo loading, the facility can also utilize the storage pigs on the cement silo. The storage pigs are used to supplement reduced shipments of cement from the facility's primary suppliers. The control system on the existing cement silo is also used to control the transfer of product in the storage pigs.

Emission Unit No. 023 is exempt from PM-RACT Rule 62-296.700, F.A.C. because the PM emissions are less than 1 ton/yr. However, EU No. 023 is still required to operate in conjunction with the abbreviated *Small Baghouse O&M Plan (non-RACT)* as specified in Appendix B of the current operating permit and is subject to a 5% opacity limit in order to exempt it from the requirement to perform PM testing.

Location: 809 South Woodrow Wilson Road, Plant City

UTM: 17-387.13 E and 3089.63 N NEDS NO: 0460

Emission Unit No.: 023 – Cement Silo #1

References Permit No.: NA

Replaces Permit No.: NA

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, F.A.C.]

5. As requested by the permittee, and in order to exempt this emission unit from Particulate RACT, the maximum allowable particulate emissions and potential to emit shall not exceed 0.02 gr/dscf and 1 ton per year, respectively. [Rule 62-4.070(3), F.A.C]

6. The hours of operation are not restricted. [Rule 62-4.070(3), F.A.C]

7. Visible emissions shall not exceed 5% opacity. [Rule 62-4.070(3), F.A.C. and Chapter 1-3.52(2), Rules of the EPCHC]

8. In order to ensure compliance with Specific Conditions Nos. 5 and 7, the following restrictions shall apply: [Rule 62-4.070(3), F.A.C]

A) All dust laden air generated during silo loading shall be vented to the baghouse controlling that particular emissions unit.
B) Pneumatic loading of the cement silo shall not exceed 14 psig.
C) The material from EU No. 023 shall only be used in production on Board Lines #1, #2 and #3.
D) No more than 490.0 million square feet shall be produced from Board Lines 1, 2, and 3 in any 12 consecutive month period.

{Permitting Note: "Green Sheets" that are produced from the board lines but reinserted into the cycle for reprocessing can be excluded from the total. Any produced boards that are not reused in the system (i.e. sellable product, interleavers, and rejects) must be counted as part of the stated limit.}

9. The permittee shall install, operate and maintain a measuring device to determine the air pressure differential across the baghouse(s) within 10 percent accuracy. [Rule 62-4.070(3), F.A.C.]

10. Test EU No. 023 for visible emissions within 30 days of start-up of the new baghouse, and annually thereafter. The permittee shall submit two copies of test data to the Air Compliance Section of

SPECIFIC CONDITIONS:

the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of each testing. Testing procedures shall be consistent with the requirements of Rule 62-297, F.A.C. [Rules 62-4.070(3) and 62-297.310(8), F.A.C.]

11. Compliance with the emission limitations of Specific Condition No. 7 shall be determined using EPA Method 9 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. All visible emission test observation periods shall be a minimum of 30 minutes. If the silo loading operation is normally completed within less than 30 minutes and does not recur within that time, the test shall last the length of the silo loading operation. The visible emissions tests of silos shall be conducted while actively loading the silos. [Rule 62-297.310(4)(a), F.A.C.]

12. Compliance testing of the baghouse shall be conducted with the unit operating at no less than the normal operating level. Due to the nature of some of the loading operating on a batch cycle and the difficulty in equating this to an hourly rate, the following specifications for visible emission testing shall be followed: [Rule 62-4.070(3), F.A.C.]

EU No. 023
Visible emission tests shall be conducted while loading the silo at a rate that, at a minimum, is representative of the normal silo loading rate. To ensure typical loading operation, the loading of the silo during visible emission testing shall occur between a minimum of 11 psig and a maximum of 14 psig delivered from the loading trucks. The test report shall specify the actual loading rate along with the loading pressure.

13. If the parameters from Specific Condition No. 12 cannot be met, then the source will be limited to 110% of the limiting conditions under which it complied (i.e., loading pressure delivered from the truck) until a new test is conducted. Once the unit is so limited, then operation at higher rates is allowed for no more than fifteen days for purposes of additional compliance testing to regain the normal operational levels, with prior notification to the EPC. Failure to submit the loading pressure and actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

14. The maximum allowable emission rate for particulate matter for this source is set by Specific Condition No. 5. 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 emission standard not to exceed opacity of 5%. [Rules 62-297.620(4), 62-297.310(7)(c), and 62-4.070(3), F.A.C.]

15. 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]

SPECIFIC CONDITIONS:

16. 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 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.]

17. In order to demonstrate compliance with Specific Condition No. 8, the permittee shall maintain monthly records of operations for the most recent two 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 62-4.070(3), F.A.C.]

A) Date: Month and Year
B) Tons of each dry material received for each silo
C) Rolling twelve (12) month total of B) above

18. In order to provide reasonable assurance that the baghouse will operate and be maintained to perform adequately the function for which it is intended, an Operation and Maintenance Plan (O & M plan) shall be submitted with the air operation permit application. [Rule 62-4.070(3), F.A.C.]

19. The permittee shall not circumvent the provisions of an applicable emission limitation by increasing the volume of gas in any exhaust or group of exhausts for the purpose of reducing the stack gas concentration. This includes allowing dilution air to enter the system through leaks, open vents, or similar means. [Rule 62-296.700(5), F.A.C.]

20. 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, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions include the following: [Rule 62-296.320(4)(c)2., 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, pipe flattening 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.

SPECIFIC CONDITIONS:

F) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.

21. 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.

22. 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(185), F.A.C., Modification. 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.
C) The use of materials and fuels other than those authorized by this permit.

23. The permittee shall submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. [Rule 62-210.370(3), F.A.C.]

24. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of 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.]

25. A minimum of two copies of an operating permit application with an O&M plan and manufacturer's design information for the baghouse shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of the compliance testing 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

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Richard D. Garrity, Ph.D.
Executive Director