FINAL DETERMINATION

FOR

Titan America, LLC

Hillsborough County

Air Construction Permit

Application Number

0571290-013-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

October 17, 2014

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on September 26, 2014 that included an Intent to Issue Permit No. 0571290-013-AC to Titan America, LLC. The facility is located at 4219 Maritime Blvd., Tampa, FL, Hillsborough County, FL, 33605. This permit authorizes construction of two additional railcar and truck unloading lines at the concrete raw material terminal and aggregate handling facility. In addition, this permit increases the hourly railcar and truck unloading rate from 100 tons/hour to 200 tons/hour.

The Public Notice of Intent to Issue was published in the Tampa Bay Times on October 2, 2014, 2014.

COMMENTS/CHANGES

On September 29, 2014, the applicant submitted two comments on the Draft Permit via email. Based on the comments submitted, Specific Condition No. 22 is removed from the permit in order to allow the facility the flexibility in deciding which baghouse to operate during unloading operations.

In addition, Specific Condition No. 29 is revised as requested to allow the facility to maintain records on whether material was unloaded from ships or railcars/trucks since the unloading operation is the same when unloading railcars and trucks.

CONCLUSION

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

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

John Crawford
Director, Environmental
Titan America, LLC
455 Fairway Dr.
Deerfield Beach, FL 33441

Dear Mr. Crawford:

Enclosed is Permit Number 0571290-013-AC for the construction of two additional railcar and truck unloading lines, 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

cc: Florida Department of Environmental Protection (via email)
Brad James, P.E. – Trinity Consultants (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:	PERMIT/CERTIFICATION
Titan America, LLC	Permit No.: 0571290-013-AC
4219 Maritime Blvd.	County: Hillsborough
Tampa, FL 33605	Expiration Date: September 30, 2015
	Project: Railcar and Truck Unloading

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 construction of two additional railcar and truck unloading lines at a concrete raw materials and aggregate handling facility. The facility receives concrete raw materials by ship, railcar, and truck. Concrete raw materials is defined as Portland cement Types I, II, III, IV, V, white cement, masonry cement, flyash, slag cement, natural and synthetic gypsum, lime, cement kiln dust, natural pozzolana, and artificially produced pozzolana materials.

During railcar and truck unloading, concrete raw materials are pneumatically transferred using the railcar and truck unloading lines. The existing unloading line transfers material to either the filter/receiver or directly to the two interstitial silos. The two new unloading lines will transfer the material into the filter/receiver. The filter/receiver then directs the material to the four main silos and/or the two interstitial silos. The three unloading lines can be used simultaneously and are located on the south side of Silo No. 4.

The material is pneumatically unloaded from the railcars and trucks using air from the railcar and truck's onboard pumps and/or electrical powered compressors located in the silo structure. When material is directed to the filter/receiver, PM emissions are controlled by a 25,000 DSCFM F.L. Schmidt, Model No. 398FR12(6), jet pulse baghouse. When material is transferred directly to the two interstitial silos, PM emissions are controlled by each silo's 1,790 DSCFM F.L. Schmidt Airtech, Model No. 48DS8FM, jet pulse baghouse.

Location: 4219 Maritime Blvd., Tampa, FL 33605

UTM: 17- 359.94E 3087.81N Facility ID No.: 0571290

Emission Unit No.: EU 001 - Filter/Receiver

References Permit Nos.: 0571290-009-AC

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. As requested by the permittee, in order to limit the potential to emit for Hazardous Air Pollutants (HAP), the HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons for any individual HAP and less than 25 tons for any combination of HAPs in any 12 consecutive month period. [Rules 62-212.300, 62-210.200, and 62-4.070(3), F.A.C. and Permit No. 0571209-009-AC]

7. When used in this permit the term Concrete Raw Materials is defined as Portland Cement Types I, II, III, IV, V, white cement, masonry cement, flyash, slag cement, natural and synthetic gypsum, lime, cement kiln dust, natural pozzolana, and artificially produced pozzolana materials. [Rule 62-4.070(3), F.A.C. and Permit No. 0571209-009-AC]

8. Each baghouse shall have a device capable of monitoring the pressure differential across the baghouse. The monitoring device shall be maintained in working order and shall be calibrated and adjusted to indicate the true value of the pressure drop with sufficient accuracy to allow the pressure drop to be determined within 10% of its true value. [Rules 62-4.070(3) and 62-297.310(5)(a) and (b), F.A.C.]

9. The baghouses controlling the source under this permit shall be kept in good repair. [Rule 62-4.070(3), F.A.C.]

10. The permittee shall not allow any person to circumvent any pollution control device or allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

11. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any

SPECIFIC CONDITIONS:

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.]

12. The owner or operator shall notify 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 test contact person who will be responsible for coordinating and having such test conducted. [Rule 62-297.310(7)(a)9., F.A.C.]

13. Submit two copies any test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Test procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rule 62-297.310(8)(b), F.A.C.]

14. 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.]

15. 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: [Rule 62-296.320(4)(c), F.A.C.]

A) Use covers or wind shields at the shiphold, as necessary, to meet the opacity standard.
B) Attend to major operational upsets promptly and effectively. Stop operation, if necessary.
C) Curtail operations during high wind conditions, if necessary.
D) On days when the equipment is in use, inspect the screw auger and screw conveyor for visible emissions daily. Record any problems and actions taken.
E) Maintain trafficked areas clean. Post a sign to limit vehicle speeds to 10 miles per hour.
F) Exercise good housekeeping practices at all times.
G) Paving or maintenance of roads, parking areas, and yards.
H) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, and open stock piles, as necessary.
I) Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent re-entrainment and from building or work areas to prevent particulates from becoming airborne, as necessary.
J) Each conveyor transfer point shall have enclosures to ensure compliance with the 5% opacity standard.

SPECIFIC CONDITIONS:

16. 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(205), 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.
C) The handling of any new material not identified in this permit.

17. 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.]

18. 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.]

19. The maximum throughput of concrete raw materials shall not exceed 750,000 tons per any twelve consecutive month period. [Rule 62-4.070(3), F.A.C. and Permit No. 0571290-009-AC]

20. The maximum combined unloading rate from railcars and trucks into the silos shall not exceed 200 tons/hour. [Rule 62-4.070(3), F.A.C. and Permit Application Received September 22, 2014]

21. All three railcar and truck unloading lines may be operated simultaneously. [Rule 62-4.070(3), F.A.C. and Permit Application Received September 22, 2014]

22. [Reserved]

23. The maximum potential and allowable particulate matter emissions shall not exceed the following per any twelve consecutive month period: [Rule 62-296.711(2), F.A.C. and Permit No. 0571290-009-AC]

SPECIFIC CONDITIONS:

EU No. and Description	Control Equipment	Control Equipment Model No.	DSCFM	Pollutant	Potential Emissions (Tons/yr)	Allowable Emissions
001 - Filter/Receiver	F.L. Schmidt Jet Pulse Baghouse	398FR12(6)	25,000	PM	28.2	0.03 grains/dscf

24. Emission Unit No. 001 is authorized to operate continuously (8,760 hours/year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C. and Permit No. 0571290-009-AC]

25. The permittee shall not cause, permit, or allow any visible emissions (5% opacity) from Emission Unit No. 001. [Rule 62-296.711(2), F.A.C. and Permit No. 0571290-009-AC]

26. Test the railcar and/or truck unloading operation, at the filter/receiver baghouse exhaust while all three unloading lines are in operation, the first time after completion of construction for visible emissions. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rule 62-297.310 and 62-4.070(3), F.A.C.]

27. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of a gauge pressure of 12 psi while unloading railcars and trucks and all three unloading lines are in operation. 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 rate 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. The test report shall include the unloading rates, the baghouse pressure drops, and the unloading pressure gauge. Failure to submit the actual operating conditions may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2)(b), F.A.C.]

28. Compliance with the emission limitations of Specific Condition No. 25 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.]

29. In order to demonstrate compliance with Specific Condition Nos. 19, 20, and 23, the permittee shall maintain a monthly recordkeeping system for the most recent three year period. However, the facility should maintain daily records and make them available upon request. 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:[Rules 62-

SPECIFIC CONDITIONS:

4.070(3) and 62-213.440(1)(b)2.b., F.A.C.]

A) Month, Year
B) Type of unloading operation (i.e., ship unloading or railcar/truck unloading)
C) Amount and type of material unloaded (tons)
D) Hours of operation of each Emission Unit
E) Twelve month rolling total of C) and D) above

30. 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 compliance testing of the railcar and truck unloading operation 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