Environmental Compliance Plan (ECP)

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For

Boral Materials Technologies, Inc.

Panama City, FL Facility

December 2007

O & M Plan

Boral Materials Technologies flyash transfer facility is designed and constructed to transfer flyash from railroad cars into 250 ton storage silo and from there to truck tankers which distribute flyash to customers. It is a fully enclosed system and if operated properly does not allow flyash to leave the system and spill onto the ground and/or create fugitive emissions. PM emissions during process of loading flyash from railroad car into storage silo using compressed air from stationary air compressor(s) located on plant property or during unloading of flyash from storage silo into truck tankers using gravity fed are controlled by bin vent (baghouse) located atop storage silo. Bin vent (baghouse) operates as follows: air laden with dust is sucked from the silo into bin vent via negative pressure produced by the blower atop the bin vent housing. Air passes through cartridge(s) walls from outside in, leaving dust accumulated on outside of cartridge walls. Clean air then travels to clean air plenum and is discharged outside through the blower. Cartridges are cleaned by use of compressed air jets located atop each cartridge. Pulsing is activated by timer which actuates jets in approximate 1 to 1.5 minute intervals. Pulses force dust accumulated on the outside walls of cartridge(s) back into the silo. Pulsing action is manually activated by the operator when flyash is transferred from railroad car into silo or from silo to truck tanker. 8" vent line leading from truck loading chute to top of silo carries dust created inside the chute during tanker loading back into the silo. Exhaust blower atop bin vent runs during loading or unloading of the silo to create negative pressure inside the silo. This negative pressure helps move air displaced from the silo during flyash transfer from railroad car to silo and/or sucks dust from tanker loading chute through 8" vent pipe. Truck loading chute is equipped with flexible connection (sleeve) and molded rubber snout. Flexible connection makes it possible for the end of the chute to be raised and/or lowered as needed so that rubber snout can fit tightly into tanker loading opening.

System was designed to be able to receive flyash into storage silo at the rate of 50 TPH at the same time as flyash is being transferred from silo into truck tanker at the rate of 150 TPH.

To operate this facility operator(s) is trained to understand how system works before being allowed to operate the facility. Present operator (plant manager) is fully trained from working with the company at other locations, but any new hire will be trained as required.

Operator(s) understands that successful operation of this plant from environmental standpoint depends on several factors:

1. Integrity of the system. Any possible tears in system piping, flex connection(s), storage silo and miscellaneous fittings and appurtences will result in fugitive emissions and/or spillage of flyash on the ground.
2. Tight fitting of discharge chute snout into truck tanker opening prevents fugitive emissions
3. Observing maximum transferring flows as follows: 50 TPH from railroad car to storage silo and 150 TPH from silo to tankers
4. Keeping track of the amount of flyash in the silo (250 ton maximum) so that silo is not overfilled causing flyash to spill to the ground.
5. Turning on bin vent blower and actuating clean pulsing system every time flyash is being transferred from railroad car to silo or from silo to truck tankers.
6. Observing the operations of the bin vent and recording pressure differential (magnehelic) gauge readings daily when facility is in use. Understanding what gauge indicates is important. It indicates the condition of filtering media (cartridges) by measuring simultaneously pressure before and after filtering media. Newly installed cartridges will indicate low readings and as filtering media gets loaded with dust, pressure will increase. During initial visual emissions test magnehelic gauge indicated 1.5 to 1.6" W.G. On basis of this, operating range was selected as 1.0 to 2.0" W.G. When magnehelic

gauge readings start approaching 2.0" W.G., it is time to replace cartridges. Incorrect gauge readings may result from gauge itself not operating correctly due to moisture accumulation in the gauge itself or in lines leading to the gauge. When this occurs, disconnect lines leading to the gauge and make sure gauge zeroes itself out and/or possibly clean lines with compressed air (gently).

7. Observe Pm (fugitive emissions) from bin vent daily. System is designed so that very little if any visible emissions should be detected. Although plant operator is not trained or certified to conduct VE test, he/she should recognize that something is different from day to day observation and detect abnormal event due to excessive dust coming from the blower exhaust. This will indicate punctured or incorrectly fitted cartridge(s) in the bin vent.
8. Check daily (first thing in the morning) that compressor(s) supplying air to bin vent pulsing mechanism is in good operating order. Also check that power supplied to pulsing timer is on and time timer operation, making sure it actuates pulsing of jets in prescribed intervals of 1.0 to 1.5 minutes.

Procedures for Startup and Shutdown

Transfer of flyash from railroad car(s) to storage silo or from storage silo to truck tanker(s) will not commence until bin vent blower and pulsing system are turned on.

Run bin vent blower and pulsing system 15 minutes longer after transfer is completed.

Record Keeping

Operating parameters such as differential pressure readings and visual observation of the bin vent discharge will be recorded on log sheet. Sample is attached.

The following documents will be kept on site for a minimum of 5 years:

Copy of current DEP Construction and Operation Permits

Copy of this Environmental Compliance Plan

Daily bin vent data (on days when operated)

Records of flyash processed in 12-month rolling totals

Maintenance records on the bin vent and associated equipment

Records of malfunctions or failures of the above and corrective actions taken

Results of last compliance (visible emissions) test

Rolling 12-month Totals

Rolling 12-month totals of the amount of flyash transferred will be recorded on the log sheet. Sample is attached.

At the end of each month all the totals will be summarized and recorded. Rolling 12-month totals for flyash will be calculated by adding current month figures to previous 11 month totals.

Since facility is allowed to operate unlimited hours (8,760 hr/yr), it is not necessary to record operating hours.

Abnormal Events

In the event Boral Material Technologies, Inc. is temporarily unable to comply with any of the conditions of the DEP permit due to a breakdown of equipment, power outages, or destruction by hazard of fire, wind, or other cause, Boral will notify DEP. Notification shall be made in person, by telephone, or other means within 24 hours of breakdown or malfunction. The telephone number to call to notify DEP is (850) 595-0578. For emergencies involving a significant threat to human health or the environment, the number is (850) 320-0519.

A written report of any noncompliance referenced above shall be submitted to the Florida Department of Environmental Protection, 160 Governmental Center, Pensacola, FL 32502-5794, within 30 days after its occurrence. The report shall describe the nature and cause of the breakdown or malfunction, the steps being taken or planned to be taken to correct the problem and prevent its reoccurrence, emergency procedures in use pending correction of the problem and time when the facility will again be operating in accordance with permit conditions.

If an emergency arises or there is any condition, which prevents the continued operation of the emissions control components or results in non-compliance with applicable regulations, the operator will:

Stop production immediately.

Notify Area Superintendent(s), as soon as practically possible, of the time, date, and nature of the occurrence and the corrective action(s) taken.

Ensure that the emission control components are in good working order before resuming production.

Forms

Boral Materials Technologies, Inc.

Panama City, FL

Bin Vent Data Log

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Date							
Time							
Differential Pressure " WG							
Exhaust Visual Inspection							

Stack Visual Inspection

0 = No visible emissions, ideal, normal

1 = Barely visible, shut down, check bin vent, repair

Boral Materials Technologies, Inc.
Panama City, FL

Rolling 12-month Totals

Year _____

Month													**Rolling 12-Month Total**
Flyash Transferred To Silo													
Flyash Transferred To Tankers													