



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

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LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

PERMITTEE:

New NGC, Inc., dba National Gypsum Company
1767 Wildwood Road
Green Cove Springs, Florida 32043

Permit/Cert Number: 0190056-012-AO
Date of Issue: August 19, 2014
Expiration Date: August 19, 2019

Authorized Representative:

Mr. George Koslowski, Plant Manager

Project: Air Operation Permit Renewal

PROJECT AND LOCATION

This permit authorizes the renewal of Permit No. 0190056-010-AO for the continued operation of a PermaBase Cement Backboard Manufacturing Facility (Standard Industrial Classification No. 3272). The facility is located in Clay County at 1767 Wildwood Road, Green Cove Springs, Florida. The UTM coordinates are Zone 17, 436.15 km East, and 3316.98 km North.

This final permit is organized by the following sections.

- Section 1. General Information
- Section 2. Administrative Requirements
- Section 3. Emissions Unit Specific Conditions
- Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) 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 must be filed within 30 days after this order is filed with the clerk of the Department.

SECTION 1. GENERAL INFORMATION

Executed in Jacksonville, Florida.



Richard S. Rachal III, P.G.
Program Administrator
Waste and Air Resource Management Program

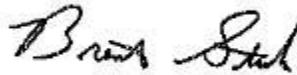
CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Notice of Issuance and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on August 19, 2014 to the persons listed below.

Mr. George Koslowski, National Gypsum Company (e-mail address: georgek@nationalgypsum.com)
Mr. George Whitmer, Whitmer Environmental Services, Inc. (e-mail address: george@whitmerenv.com)

Clerk Stamp

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



(Clerk)

August 19, 2014
(Date)

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

This facility manufactures PermaBase Cement Board, a rigid substrate made of Portland cement, aggregate and expanded polystyrene that can be used as an interior or exterior underlayment for ceilings, beams, arches, walls, and anywhere an evenly curved surface is required.

Polystyrene beads are poured into a stainless steel vessel and augured into an expansion chamber where they are expanded using steam at 220 ° F. Steam is generated by a propane-fired boiler with heat input rate of 1.26 mmBtu/hour. In the expansion chamber, expanded polystyrene (EPS) beads are injected with pentane (blowing agent) that gives the beads expansion vibrancy and allows them to be processed and molded into low-density foam particles that go through the first pass storage bag . The process is repeated and the expanded polystyrene goes into a receiving bag where they are fed into a mixer. Sand and cement are mixed with the expanded polystyrene and the finished mix is applied to boards on a processing conveyor. The boards are cut to proper length at the end of the conveyor and transferred to a stacker where they are stacked into the proper number of cement boards, wrapped in plastic and bundled for shipment.

This facility consists of a fly ash storage silo; two aluminate cement storage silos, three portland cement storage silos and a mixer receiving vessel. The air pollutants emissions from the facility are Volatile Organic Compound (VOC) and Particulate Matter (PM). Each silo is equipped with a dust collector to control particulate emissions. The VOC emissions from the expansion chamber are uncontrolled and released through a stack.

The existing facility consists of the following permitted emissions units.

Facility ID No. 0190056		
Eu ID No.	Emission Unit Description	
007	Polystyrene Expansion	
008	Concrete batching Operation	
	<u>Emission Point ID</u>	<u>Description</u>
	01	Fly ash Silo
	02	Aluminate Cement Storage Silo
	03	Aluminate Cement Storage Silo
	04	Portland Cement Storage Silo
	05	Portland Cement Storage Silo
	06	Portland Cement Storage Silo
07	Mixer Receiving Vessel	

SECTION 1. GENERAL INFORMATION

FACILITY REGULATORY CLASSIFICATIONS

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility **is not** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year, and individual and total hazardous air pollutants are less than 10 and 25 tons per year, respectively in accordance with Chapter 62-210, F.A.C.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department:

Application for Air Permit – Non-Title V Source received August 18, 2014.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Waste and Air Resource Management Program. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256 and Phone Number (904) 256-1700.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions; and
 - d. Appendix D. Common Testing Requirements.
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

[Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

[Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Construction Permit Required. Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new, reconstructed, or modified facility or emissions unit, or any new pollution control equipment prior to the beginning of construction, reconstruction pursuant to CFR 60.15 or 63.2, or modification of the facility or emissions unit or addition of the air pollution control equipment; or to establish a PAL; in accordance with all applicable provisions of Chapter 62-210, F.A.C., Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C.

[Rule 62-210.300(1)(a), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

8. Application for Non-Title V Operation Permit Renewal: A completed Application for Air Permit –Non-Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this operation permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

[Rules 62-4.030, 62-4.055, 62-4.220, 62-210.300(1)(a), and 62-4.210.300(2), F.A.C.]

9. The ID Number and Project Name for this source shall be used on all correspondences.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

A. EU007 Polystyrene Expansion

This section of the permit addresses the following emissions unit:

Emissions Unit	Brief Description
007	Polystyrene Expansion

The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212; 62-296 and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations.

RECORDKEEPING REQUIREMENTS

A.1. The owner or operator shall record the following information. These records shall be retained for at least three (3) years following the date at which such measurements, records, or data are recorded. Records shall be made available to the Department upon request.

- a. The monthly throughput rate for polystyrene expansion.
- b. Total VOC emissions for each 12-consecutive month.

[Rule 62-4.160(14)(b), F.A.C. and 0190056-007-AC]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

Concrete Batching Operation

This section of the permit addresses the following emissions unit.

Emissions Unit	Emissions Point	Emissions Pts. Description
008	01	Fly ash Silo
	02	Aluminate Cement Storage Silo
	03	Aluminate Cement Storage Silo
	04	Portland Cement Storage Silo
	05	Portland Cement Storage Silo
	06	Portland Cement Storage Silo
	07	Mixer Receiving Vessel

PERFORMANCE RESTRICTIONS

B.1. Hours of Operation: The hours of operation are not restricted, i.e. 24 H/D; 7 D/W; 52 W/Y, and 8760 Hours per year.

[Rules 62-4.160(2), 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

B.2. Stack Emissions: Emissions from silos, weigh hoppers (batchers), and other enclosed storage and conveying equipment shall be controlled to the extent necessary to limit visible emissions to 5 percent opacity.

[Rule 62-296.414(1), F.A.C.]

B.3. Unconfined Emissions: The owner or operator shall take reasonable precautions to control unconfined emissions from hoppers, storage and conveying equipment, conveyor drop points, truck loading and unloading, roads, parking areas, stock piles, and yards as required by Rule 62-296.320(4)(c), F.A.C. For concrete batching plants the following shall constitute reasonable precautions:

- (a) Management of roads, parking areas, stock piles, and yards, which shall include one or more of the following:
 - 1. Paving and maintenance of roads, parking areas, and yards.
 - 2. Application of water or environmentally safe dust-suppressant chemicals when necessary to control emissions.
 - 3. Removal of particulate matter from roads and other paved areas under control of the owner or operator to mitigate reentrainment, and from building or work areas to reduce airborne particulate matter.
 - 4. Reduction of stockpile height or installation of wind breaks to mitigate wind entrainment of particulate matter from stockpiles.

- (b) Use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck.

[Rule 62-296.414(2), F.A.C.]

SECTION 3. EMISSIONS UNITS SPECIFIC CONDITIONS

Concrete Batching Operation

COMPLIANCE MONITORING AND TESTING REQUIREMENTS

B.4. Annual Visible Emissions Test: A visible emissions test shall be performed at each of the following emission points on an annual basis in order to demonstrate compliance with the opacity limit as specified in Specific Condition No. B.2. for the concrete batching operation. The test method shall be EPA Method 9 as specified in Appendix A, of 40 CFR 60 and adopted by reference in Rule 62-204.800, F.A.C.

Emissions Unit	Emissions Point	Emissions Pts. Description
008	001	Fly ash Silo
	002	Aluminate Cement Storage Silo
	003	Aluminate Cement Storage Silo
	004	Portland Cement Storage Silo
	005	Portland Cement Storage Silo
	006	Portland Cement Storage Silo
	007	Mixer Receiving Vessel

[Rules 62-296.414(3)(a)., 62-96.414(4)(b), F.A.C.]

B.5. Silo Loading During VE Testing: Visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. Each test report shall state the actual silo loading rate during emissions testing and, if applicable, whether or not batching occurred during emissions testing.

[Rule 62-296.414(3)(c), F.A.C.]

B.6. Test Notification: The permittee shall notify the air compliance section of this office in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310(7)(a)9., F.A.C.]

B.7. Standard Testing Requirements: All required emissions tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-296.414(3)(b), F.A.C.]

RECORDS AND REPORTS

B.8. Test Report Submittal: Test result reports shall be prepared and submitted in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. Reports of the required compliance tests shall be filed with the air compliance section of this office as soon as practical but no later than 45 days after the last test is completed.

[Rules 62-297.310(8)(b), 62-296.414(3)(b), F.A.C.]