Title V Air Operation Permit Revision
Permit No. 0010087-050-AV

APPLICANT

The applicant for this project is Argos Cement, LLC. The applicant's responsible official and mailing address are: Chris Horner, Plant Manager, Argos Newberry Cement Plant, 4000 Northwest County Road (CR) 235, Newberry, Florida 32669.

FACILITY DESCRIPTION

The applicant operates the existing Argos Newberry Cement Plant, which is located in Alachua County at 4000 Northwest CR 235 in Newberry, Florida.

Argos Cement, LLC, Newberry Cement Plant, is a Portland cement plant and associated quarry, and raw material and cement handling operations. The plant combines raw materials and utilizes preheater/precalciner kilns with in-line raw mill to produce clinker. The clinker is milled and combined with gypsum to produce Portland cement. The facility consists of the following major activities: raw material handling and storage; raw mill systems; kiln systems; clinker handling; finish grinding operations; cement handling, loading, and bagging operations; and coal handling and grinding operations.

The facility consists of the following existing regulated emission units:

EU No.	Brief Description
001	Raw Material Handling and Storage
002	Raw Mill System Line 1(EUs 01, 03 and 04)
003	In-Line Kiln System/Raw Mill - Line 1
004	Clinker Handling - Line 1
005	Finish Grinding Operation Line
006	Cement Handling, Loading, and Bagging Operation
007	Coal Handling and Grinding Operation Line 1
008	Clinker-to-Railcar/Truck Transfer Conveyor
009	Raw Mill System - Line 2
010	In line Kiln/Raw Mill - Line 2
011	Clinker Handling - Line 2
012	Finish Grinding Operation - Line 2
013	Cement Load-Out Silos 6 and 7
014	Coal Handling - Mill 2
017	Emergency Diesel Generator (1,150 horse power (HP))
019	Emergency Diesel Fire Pump (83 HP)

This facility also includes miscellaneous unregulated/insignificant emissions units and/or activities.

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V Permit No. 0010087-041-AV by updating the Title V permit to include administrative correction Permit Nos. 0010087-043-AV and 0010087-048-AV for the above referenced facility and to include the following revisions: to incorporate the applicable compliance dates and requirements for Title 40 Code of Federal Regulations Part 63 (40 CFR 63), Subpart LLL - National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry (Cement MACT); incorporate the applicable requirements of Rule 62-204.800(9)(f), F.A.C., which adopts 40 CFR Part 60, Subpart DDDD - Emissions Guidelines and Compliance Times for Commercial and Industrial Solid

Waste Incineration (CISWI) Units; and make minor corrections and clarifications to the permit.

In addition, the project extends the Cement MACT compliance date for the clinker coolers that are part of Clinker Handling Lines Nos. 1 and 2 at the facility to allow the completion of two projects where the electrostatic precipitators on the clinker coolers will be replaced with baghouses to ensure compliance with the particulate matter emission limit in Subpart LLL. Specifically, the for the first clinker cooler ESP/baghouse replacement project, the Cement MACT compliance date is extended from September 9, 2015 to March 31, 2016. For the second (next) clinker cooler ESP/baghouse replacement project, the Cement MACT compliance date is extended from September 9, 2015 to September 9, 2016.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

- Application for a Title V Air Operation Permit Revision received on 06/06/2014.
- Request for Additional Information issued on 7/02/2014.
- Request for Additional Information response received on 08/08/2014, application incomplete.
- Request for Additional Information issued on 08/20/2014.
- Request for Additional Information response received on 10/02/2014, application incomplete.
- Request for Additional Information issued on 10/30/2014.
- Request for Additional Information response received on 11/18/2014, application complete.

PRIMARY REGULATORY REQUIREMENTS

Standard Industrial Classification (SIC) Code: 3241 – Cement, Hydraulic.

North American Industry Classification System (NAICS): 327310 – Portland Cement Manufacturing.

HAP: The facility is identified as a major source of HAP.

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is a PSD-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60. The following emission units are subject to NSPS requirements.

Regulation	EU No(s).
40 CFR 60, Subpart A, NSPS General Provisions	001 – 014, 017
40 CFR 60, Subpart F, NSPS for Portland Cement Plants	002, 004 - 006, 008, 009, 011 - 013
40 CFR 60, Subpart Y, NSPS for Coal Preparation Plants	007, 014
40 CFR 60, Subpart OOO, NSPS for Nonmetallic Mineral Processing	001
40 CFR 60, Subpart DDDD, NSPS Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration (CISWI) Units	002, 003, 009, 010
40 CFR 60, Subpart IIII, NSPS for Stationary RICE	017

NESHAP: The facility operates units subject to the NESHAP of 40 CFR 63. The following emission units are subject to NESHAP requirements.

Regulation	EU No(s).
40 CFR 63, Subpart A, NESHAPS General Provisions	002, 004 - 009, 011 – 013, 019
40 CFR 63, Subpart LLL, NESHAP for Portland Cement Manufacturing	002, 004 - 009, 011 – 013
40 CFR 63, Subpart ZZZZ, NESHAP for Stationary RICE	017, 019

PROJECT REVIEW

The permit revision includes the following changes.

1. Changes throughout the Title V air operation permit:
   a. Facility name change from Florida Rock Industries, Inc., Thompson S. Baker Cement Plant – Newberry, to Argos Cement Plant, LLC, Argos Newberry Cement Plant.
   b. Removed **Conditions A-G, and K.0** referencing Tables I and II since: they are in duplicate form; included in the appendices; and cited in the subsections titled Common Conditions.
   c. Corrected formatting within the permit for consistency.
   d. Corrected referenced rules and permit numbers.

Table of Contents

2. Updated the names of the emission units, page numbers and appendices to include the NESHAP Subpart LLL (Portland Cement Manufacturing Industry) of 40 CF R 63 (version 2/12/2013) and include NSPS Subpart DDDD (Emission Guidelines and Compliance Times for CISWI Units) of 40 CFR 60.
3. Reduced the number of regulated engines from three to two since one of the engines is an unregulated emissions unit and separated the regulated emergency engine and fire pump into individual subsections.
4. Removed reference to a history table since this permit did not include one.

Section I. Facility Information

Subsection B. Summary of Emission Units

5. Revised the name of Line 1 and 2 kiln systems (EU 003 and EU 010).
6. Reduced the number of emergency engines from three to two since one was removed from the site and separated the existing emergency engine and fire pump engine into individual subsections.

Subsection C. Applicable Regulations

7. Removed the statement that this facility operates stationary engines in accordance with NESHAP Subpart ZZZZ since this information is provided in the summary of applicable regulation table.
8. Updated the table of applicable regulations to include or remove emission units subject to specific regulations.

Section II. Facility-Wide Conditions

9. Added the electronic annual operating reporting requirements as **Condition FW6**.
10. Added the prevention of accidental released as **Condition FW8**.

Section III. Emissions Units and Specific Conditions

Subsection A. Raw Materials Handling and Storage (EU 001)

11. Added a table identifying the emission unit number and brief description.
12. Included the average processing rate in tons/year to **Condition A.4** (Permitted Capacity), Note 1.
13. Added a permitting note identifying Table 2-1, Summary of Compliance Requirements summarizing information for convenience purposes only.
14. Removed **Condition A.5.a (**Visible Emissions (Emission Point (EP) 01 and EP02)) and **A.5(c)** (Visible Emissions Fugitive Emissions (EP11 and EP12)) since these conditions were combined in new **Condition A.7** (Annual Compliance Test Requirements) for clarity.
15. Removed **Condition A.5.b (**Visible Emissions Fugitive Emissions (EP03, EP10, EP13, EP17) since NSPS Subpart OOO of 40 CFR 60 only requires an initial visible emissions test, initial testing requirements have been met. A repeat performance test every 5-years was applied in error. The existing crushers and raw

material handling and storage equipment commenced construction, reconstruction or modification prior to April 22, 2008; therefore, these emission points are not subject to a repeat performance test.

16. Added **Condition A.5** (Test Methods) identifying the test method used for the visible emission tests for clarity.
17. Added **Condition A.6** (Common Testing Requirements) referencing Appendix TR, Facility-Wide Testing Requirements.
18. Added **Condition A.7** (Annual Compliance Test Required) identifying when the testing frequency for the visible emissions tests for clarity.
19. Added **Condition A.8** (Visible Emissions Compliance Requirements) for clarity.
20. Added subtitles separating recordkeeping and reporting requirements from other requirements.
21. Revised **Condition A.9** (Pursuant to 40 CFR 60.676 Reporting and Recordkeeping) by revising the title and removing the requirement to submit an opacity report for the initial testing requirements since this requirement has been met.
22. Revised **Condition A.11** (Recordkeeping (EP06, EP08, EP9, EP11 and EP12)) by removing specific emission points since this condition applies to all emission points and updating the condition to include the applicable recordkeeping requirements pursuant to Air Construction Permit Nos. 0010087-017-AC, 0010087-019-AC and 0010087-029-AC.
23. Added **Condition A.12** stating that this emission unit is subject to the applicable requirements of NSPS Subpart OOO of 40 CFR 60.

<u>Subsection B. Raw Mill System Line 1 (EU 002)</u>

24. Corrected and revised the description of the emission unit to state that the pollutant emissions from the Raw Mill emitted through EU 003 are addressed in and regulated under Subsection C for EU 003 for clarity.
25. Added to the permitting note that this emission unit is regulated under NSPS Subpart DDDD of 40 CFR 60.
26. Removed a permitting note since it is in duplicate form and belongs under the emission limitations and standards.
27. Revised **Condition B.1** (Capacity) to clarify this is a design capacity and not a permitted capacity limit.
28. Revised **Condition B.2** (Method of Operation – (i.e. Fuels) by removing the 283.8 gallons/hour limit since the limit is 2,486,000 gallons/year. The 283.8 gallons/hour is equivalent to 2,486,000 gallons/year and is not an established limit.
29. Revised **Condition B.4** (Visible Emissions) by adding the visible emissions limitation pursuant to NESHAP Subpart LLL of 40 CFR 63 for the emission points subject to this subpart.
30. Revised **Condition B.7** (Visible Emissions (Each EP)) with the following changes: added the testing duration (30 minutes, 6-minute averages) for the annual testing requirement for the visible emissions test; removed the explanation for clarity; revised the initial testing requirements for the visible emissions test for clarity; added monthly visible emission testing requirements; and added a permitting note identifying where the condition originated from as requested by the applicant.
31. Added to **Condition B.8** (Particulate Matter (PM)) requiring a compliance test for PM if the Department believed the emission standard was not being met as required in Permit No. AC01-267311/PSD-FL-228.
32. Revised **Condition B.9** (Fuel Sulfur Content (unused No. 2 fuel oil) stating that the fuel sulfur content of the No. 2 fuel oil was regulated and not sulfur dioxide (SO_2) emissions.
33. Corrected the effective date for the opacity monitoring requirement in **Condition B.10.a** (Opacity Monitoring Requirements – Eps 01, 03, 04) and added a permitting note of the effective date the new version of NESHAP Subpart LLL of 40 CFR 63 applies.

34. Revised and updated language for the opacity monitoring requirements in accordance with NESHAP Subpart LLL of 40 CFR 63 (2/12/2013 version) in **Condition B.10.b**.
35. Added **Condition B.11** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.
36. Added subtitle other requirements separating these regulations with the previous section.
37. Added **Conditions B.12 – B.14** stating that this emission unit is subject to the applicable requirements of NSPS Subpart F and Subpart DDDD of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.

Subsection C. In-Line Kiln/Raw Mill – Line 1 (EU 003)

38. Revised the name of the emission unit in the brief description.
39. Updated the permitting note for this emission unit identifying this that this emission unit is now regulated under NSPS Subpart DDDD of 40 CFR 60 and no longer subject to NSPS Subpart F of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.
40. Removed the permitting note since it is in duplicate form and belongs under the emission limitations and standards.
41. Revised and combined **Conditions C.1.a** and **C.1.b** for clarity and consistency.
42. Revised and combined **Conditions C.2.a, C.2.b** and **C.1.c** for clarity and consistency.
43. Removed Note 1 under the table in **Condition C.3** (Methods of Operation – (i.e. Fuels)) since this is a note that belongs only in the air construction permit that established this condition.
44. Added to the permitting note under Emission Limitations and Standards stating the kiln emission rate includes fuel oil combustion of nitrogen oxides (NO_X), SO_2, carbon monoxide (CO), PM, PM with a mean diameter of 10 microns or less (PM_{10}), volatile organic compounds (VOC) and sulfuric acid mist (SAM) from the raw mill air heater.
45. Removed an effective date and 2006 NESHAP reference for the mercury emission limit in **Condition C.5** (previous **C.5.a**) (Mercury (Hg) 2010 NESHAP) since this emission unit is now subject to NSPS Subpart DDDD of 40 CFR 60.
46. Removed **Condition C.5.b** (Mercury (Hg) 2010 NESHAP) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
47. Removed an effective date and 2006 NESHAP for the visible emission limit in **Condition C.6** (previous **C.6.a**) (Visible Emission) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
48. Removed **Condition C.6.b** (Visible Emission (Kiln) 2010 NESHAP) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
49. Removed effective date and 2006 NESHAP in **Condition C.7.a** (PM) and **C.7.b** (old C.7.c) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit. These conditions were combined for consistency and clarity.
50. Removed old **Condition C.7.b** (PM) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
51. Removed the table in **Condition 8** (Kiln 1 New Emissions Limits for hydrogen chloride (HCL) and total hydrocarbons (THC) (2010 NESHAP) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
52. Removed an effective date and 2006 NESHAP reference for the VOC emission limit in **Condition C.11** (VOC) since this this emission unit is now subject to NSPS Subpart DDDD of 40 CFR 60. Added a permitting note stating this emission unit is equipped with a THC continuous emissions monitoring system (CEMS) as an indicator of emission levels of VOC and the method of compliance.

53. Added the test method and averaging time for SAM emissions in **Condition C.12** (SAM).
54. Removed **Condition C.13** (Dixon/Furan D/F) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
55. Air Construction Permit No. 0010087-049-AC revised **Condition C.13 (old Condition C.15)** (Tires) stating the waste tires will be received in vehicles and not just vans.
56. Removed the following for the table in **Condition 16**: the list of fuels since the fuels are already identified in the permit; and emission tests and pollutants subject to NESHAP Subpart LLL of 40 CFR 63 since this emission unit is no longer subject to these regulations.
57. Air Construction Permit No. 0010087-049-AC revised the table identifying the emission limits for this emission unit in **Condition C.16** by removing the annual visible emission test for Kiln No. 1 since this emission unit is equipped with a continuous opacity monitoring system (COMS).
58. Removed an effective date and 2006 NESHAP for the visible emission limit in **Condition C.18** (Visible Emissions (Kiln)) since this emission unit is now subject to NSPS Subpart DDDD of 40 CFR 60.
59. Removed **Condition C.19** (Visible Emissions (Kiln)) since Kiln No. 1 is equipped with a COMS ant the annual visible emissions test was removed.
60. Removed an effective date and 2010 NESHAP for the PM test method in **Condition C.19** since this emission unit is now subject to NSPS Subpart DDDD of 40 CFR 60.
61. Removed **Condition C.26** (Dioxin/Furan (D/F)) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
62. Air Construction Permit No. 0010087-049-AC revised **Condition C.27** (NO_X and SO_2 CEMS) by removing test Method 19 and revised some language for clarity. Method 19 was added to the permitting note since Method 19 may be used to convert units into lb/ton.
63. Revised **Condition C.28** (CO and/or Oxygen (O_2) CEMS) by including an applicable appendix subsection for clarity and remove an obsolete rule.
64. Revised **Condition C.30** (VOC – CEMS) by renaming the condition THC CEMS and removing the THC emission limit pursuant to NESHAP Subpart LLL of 40 CFR 63 since this emission unit is no longer subject to these regulations.
65. Removed old **Conditions C.32.b** (PM Emissions Tests (CEMS)), **C32.c** (HCL Emissions Test (CEMS)), **C.32.d** (THC Emission Test (CEMS)), **C.32.e** (THC Monitoring Requirements), **C.32.f** (Mercury (Hg CEMS)), **C.34** (Continuous Temperature Monitor), **C.35** (Inspection), and **C.36** (Excess Emissions) since NESHAP Subpart LLL of 40 CFR 63 is no longer applicable to this emission unit.
66. Revised **Condition C.33** (Mercury Compounds (as Hg)) expiration date and future effective date for NESHAP Subpart LLL of 40 CFR 63 since this emission unit is no longer subject to this regulation.
67. Added subtitle other requirements separating these regulations with the previous section.
68. Added **Condition C.34** (NSPS Requirements – Subpart DDDD) stating that this emission unit is subject to the applicable requirements of NESHAP Subpart DDDD of 40 CFR 60.
69. Removed **Condition C.37** (Common Conditions K.0 – K.4) since these conditions are no longer applicable to this emission unit.

<u>Subsection D. Clinker Handling (EU 004)</u>

70. Updated the regulatory permitting note to include regulations this emission unit is subject to.
71. Removed the permitting note referencing Table 1-1 (Summary of Air Pollutants and Terms) since it is in duplicate form and belongs under the emission limitations and standards.

72. Revised **Condition D.1** (Capacity) to clarify this is a design capacity and not a permitted capacity limit.
73. The following changes were done to **Condition D.3** (PM): removed an expiration date: added the PM emission limit for the clinker coolers pursuant to NSPS Subpart LLL of 40 CFR 63; and combined the PM limits and identified the emission points for the clinker cooler and fabric filters for clarity.
74. Removed **Condition D.3.b** (PM (Clinker Cooler EP03) 2010 NESHAPS) since these regulation have been revised and the existing and new PM emission limit is identified in the permit.
75. Combined **Condition D.4** (PM) with **Condition D.3** for clarity.
76. Added the PM_{10} BACT limit of 0.07 lb/ton of dry feed in **Condition D.4** (PM_{10}) and the applicable emission point.
77. The following changes were done to **Condition D.5** (Visible Emissions): removed reference to 2006 NESHAP and expiration date for the 2006 and 2010 NESHAP since the new version of NESHAP Subpart LLL of 40 CFR 60 requires work practice standards; combined the visible emission limits; and identified the emission points for the clinker cooler and fabric filters for clarity.
78. Combined old **Condition D.6** (Visible Emissions (EP01, EP02 and EP04)) with **Condition D.5** for clarity.
79. Added **Conditions D.6** (Annual Compliance Tests Required) and removed **Condition D.8.a** (EP01, EP02 and EP04) clarifying the testing requirements. Air Construction Permit No. 0010087-049-AC removed the annual visible emission test for the clinker cooler ESP since this emission unit is equipped with a COMS.
80. Removed the 2006 NESHAP Subpart LLL of 40 CFR 63 and the expiration date to do a visible emissions test in **Condition D.7** (Visible Emissions (Clinker Cooler – EP03) 2006 NESHAP) since this requirement pertains to the BACT requirement in accordance with Permit No. AC01-267311 (PSD-FL-228).
81. Old **Condition D.9.b** (Clinker Cooler) was removed since the clinker cooler stack is equipped with a COMS and the annual visible emissions testing requirement was removed in Air Construction Permit No. 0010087-049-AC.
82. Added fabric filter to the title of **Condition D.8** (Visible Emissions (EP01, EP02)) and testing requirements for clarity.
83. Replaced old **Condition D.8.b** (Opacity Monitoring Requirements (EP01, EP02) 2010 version of NESHAP Subpart LLL of 40 CFR 63 with the current and future applicable Method 22 testing requirements in the new **Condition D.9** (Monthly Visible Emissions – EPA Method 22 (EP01, EP02)).
84. Revised **Condition D.10** (PM (EP03) by removing the effective date for a PM CEMS and after 9/8/15 compliance will be demonstrated per NESHAP LLL, by annual Method 5 stack testing with ongoing compliance through operation limits monitoring by continuous parameter monitoring system (CPMS).
85. Added to **Condition D.12** (PM (EP01, EP02) that should the Department believe the particulate emission standards is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by testing in accordance with Rule 62-297, F.A.C. as required in Permit No. AC01-267311/PSD-FL-228.
86. Added **Condition D.13** (Startup and Shutdown Compliance) identifying the work practice standards pursuant to NESHAP Subpart LLL of 40 CFR 63.
87. Removed the effective date in **Condition D.14** (COMS) since a COMS is required pursuant to BACT.
88. Added **Condition D.15** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.
89. Removed old **Condition D.14.b** (CEMS 2010 NESHAPS) since this is not an applicable requirement as requested by the applicant.
90. Updated the applicable requirements in **Condition D.16** (Excess Visible Emissions).

91. Removed old **Condition D.16** (Clinker Material Storage and Handling Activities) since this is not an applicable requirement as requested by the applicant.

92. Added subtitle other requirements separating these regulations with the previous section.

93. Added **Conditions D.17** and **D.18** stating that this emission unit is subject to the applicable requirements of NSPS Subpart F and NESHAP Subpart LLL of 40 CFR 63.

94. Extended the NESHAP Subpart LLL compliance date for the clinker cooler and added specific conditions laying out project milestones and reporting requirements. Specifically, the following conditions were added: **Condition D.22** (Compliance Date Extension); **Condition D.23** (Key Milestones); **Condition D.24** (Progress Reports); and **Condition D.25** (Cement MACT Initial Compliance).

Subsection E. Finish Grinding Operations – Line 1 (EU 005)

95. Removed the permitting note referencing Table 1-1 (Summary of Air Pollutants and Terms) since it is in duplicate form and belongs under the emission limitations and standards.

96. Revised **Condition E.1** (Capacity) to clarify this is a design capacity and not a permitted capacity limit.

97. Removed **Conditions E.5.a** (Opacity Monitoring Requirements (EP's 02, 05, 06 & 07) prior to 9/8/2013, **E.5.b** (Opacity Monitoring Requirements (EP's 02, 05, 06 & 07)) on and after 9/9/2013, and **E.5.c** (Opacity Monitoring Requirements (EP's 03 & 04)) on and after 9/9/2013 as requested by the applicant.

98. Revised **Condition E.6** (Visible Emissions) to include the duration of the required testing and the applicable requirements of NESHAP Subpart LLL of 40 CFR 63.

99. Revised **Condition E.7** (PM) by adding the requirement for a compliance test for PM if the Department believed the emission standard was not being met as required in Permit No. AC01-267311/PSD-FL-228.

100. Revised **Condition E.8** (EPA Method 22 Visible Emissions (EP's 02, 05, 06, & 07) to include future Method 22 testing requirements.

101. Revised **Condition E.9** (EPA Method 22 Test (EP03 & EP04)) to include the current and future testing requirements for visible emission in accordance with NESHAP Subpart LLL of 40 CFR 63.

102. Added **Condition E.10** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.

103. Added subtitle other requirements separating these regulations with the previous section.

104. Added **Conditions E.11 and E.12** stating that this emission unit is subject to the applicable requirements of NSPS Subpart F and NESHAP Subpart LLL of 40 CFR 63.

Subsection F. Cement Handling, Loading, and Bagging (EU 006)

105. Removed the permitting note referencing Table 1-1 (Summary of Air Pollutants and Terms) since it is in duplicate form and belongs under the emission limitations and standards.

106. Revised **Condition F.1** (Capacity) to clarify this is a design capacity and not a permitted capacity limit.

107. Added an applicable opacity limit in **Conditions F.4** (Visible Emissions (each EP)) pursuant to NESHAP Subpart LLL of 40 CFR 63.

108. Removed **Conditions F.5.a** (Opacity Monitoring Requirements (each EP)) prior to 9/8/2013 and **F.5.b** (Opacity Monitoring Requirements) on and after 9/9/2013 as requested by the applicant.

109. Changed the title of **Condition F.5** to Annual Compliance Tests Required for clarity.

110. Revised **Condition F.6** (Visible Emissions) for required visible emissions test methods for clarity.

111. Added **Condition F.7** (EPA Method 22 Monthly Visible Emissions (each EP) identifying the current and future visible emission monitoring requirements.

112. Revised **Condition F.8** (PM) by adding the requirement for a compliance test for PM if the Department believed the emission standard was not being met as required in Permit No. AC01-267311/PSD-FL-228.

113. Added **Condition F.9** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.

114. Added subtitle other requirements separating these regulations with the previous section.

115. Added **Conditions F.10** and **F.11** stating that this emission unit is subject to the applicable requirements of NSPS Subpart F of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.

Subsection G. Coal Handling and Grinding – Line 1 (EU 007)

116. Removed the permitting note referencing Table 1-1 (Summary of Air Pollutants and Terms) since it is in duplicate form and belongs under the emission limitations and standards.

117. Revised **Condition G.1** (Capacity) to clarify this is a design capacity and not a permitted capacity limit.

118. Revised **Condition G.3** (Visible Emissions) by combining old **Condition G.4** (Visible Emissions (Fugitive)) and adding the applicable NSPS Subpart Y of 40 CFR 60 opacity limit.

119. Revised and renumbered **Conditions G.4.a** to **G.5** (PM) and **G.4.b** to **G.5** (PM (each Eps 01, EP02, EP04 & EP05)) to state for each EP.

120. Revised and updated language in **Condition G.6** (Annual Compliance Test Required) for clarity and added to Note 2 the requirement for a compliance test for PM if the Department believed the emission standard was not being met as required in Permit No. AC01-267311/PSD-FL-228.

121. Revised **Condition G.7** (Visible Emission Compliance Requirements) to clarify the compliance requirements for this emission unit and to include the test method for fugitive emissions pursuant to best available control equipment (BACT).

122. Corrected the applicable emission points that require recordkeeping requirements in **Condition G.9**.

123. Added subtitle other requirements separating these regulations with the previous section.

124. Added **Condition G.10** (NSPS Requirements – Subpart Y) stating that this emission unit is subject to the applicable requirements of NSPS Subpart Y of 40 CFR 60.

Subsection H. Clinker-to-Railcar/Truck Transfer Conveyor (EU 008)

125. Removed the permitting note referencing Table 1-1 (Summary of Air Pollutants and Terms) since it is in duplicate form and belongs under the emission limitations and standards.

126. Revised **Condition H.2** (Permitted Capacity) by adding to the permitting note to clarify the permitted capacity of this emission unit.

127. Revised **Condition H.3** (Permitted Maximum Allowable Emission Rate) by removing the obsolete units referenced in the table and adding the opacity limit pursuant to NESHAP Subpart LLL of 40 CFR 63.

128. Added permitting note under the test method and procedures subtitle identifying Table 2-1 summary of Compliance requirements.

129. Revised **Condition H.4** (Visible Emissions (EP01, EP02 & EP03)) for clarity by including the applicable visible emissions test method, procedures and when the testing is required.

130. Removed old **Conditions H.5** (Opacity Monitoring Requirements (each EP), **H.6** (Opacity Monitoring Requirements (each EP 2010 NESHAPS)) prior to 9/8/2013, and **H.6.b** (Opacity Monitoring Requirements (each EP) 2010 NESHAPS) on and after 9/9/2013 as requested by the applicant.

131. Added **Condition H.5** (EPA Method 22 Monthly Visible Emissions (each EP)) for identifying current and future opacity monitoring requirements.

132. Added **Condition H.6** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.

133. Added subtitle other requirements separating these regulations with the previous section.

134. Added **Condition H.10** (NESHAP Requirements – Subpart LLL) stating that this emission unit is subject to the applicable requirements of NESHAP Subpart LLL of 40 CFR 63.

Subsection I. Common Conditions.

135. Revised **Condition I.2** updating the Northeast District Office phone number.

Subsection K. Common Conditions

136. Removed Kilns 1 and 2 (EU 003 and EU 010) from this subsection since the kilns are not subject to NESHAP Subpart LLL of 40 CFR 63.

137. Revised Condition K.2 (Operation of Maintenance Plans (O&M Plans)) to correct language.

138. Removed **Condition K.3** (Startup, Shutdown and Malfunction Plans (SSM)) and **K.4** (Reporting) and added language stating that NESHAP Subpart LLL removed the requirement for a SSM Plan and reporting requirements and now requires an O&M plan.

139. Removed **Condition K.5.a** (§63.1355 Recordkeeping Requirements 2006 NESHAPS Prior to 09/08/2013) and **K.5.b** (§63.1355 Recordkeeping Requirements 2010 NESHAPS On and after 09/09/2013) as requested by the applicant.

Subsection L. Raw Mill System – Line 2 (EU 009)

140. Removed the permit limits in the description of this emission unit since these limits are contained within a condition.

141. Added to the permitting note under Emission Limitations and Standards that this emission unit is also regulated under NSPS Subpart DDDD of 40 CFR 60.

142. Added a permitting note identifying Table 1-1, Summary of Air Pollutant Standards and Terms summarizing information for convenience purposes only.

143. Revised **Condition L.2** (Particulate Matter Emissions) by separating out the conditions for clarity.

144. Revised **Condition L.3** (Visible Emissions) by removing NESHAP Subpart LLL of 40 CFR 63 visible emissions limit since this emission unit is subject to the applicable NSPS Subpart DDDD of 40 CFR 60 visible emission standards as identified in Appendix NSPS Subpart DDDD.

145. Added permitting note under the test method and procedures subtitle identifying Table 2-1 summary of Compliance requirements.

146. Removed **Conditions L.7.a** (Opacity Monitoring Requirements (Each EP)) prior to 9/8/2013 and **L.7.b** (Opacity Monitoring Requirements (Each EP) after 9/9/2013, since NESHAP Subpart LLL of 40 CFR 63 does not apply.

147. Added subtitle other requirements separating these regulations with the previous section.

148. Revised **Condition L.5** (Visible Emissions (Each EP) by identifying the emission points testing requirements.

149. Revised **Condition L.6** (Annual Compliance Testing for PM and PM_{10} Emissions) and L.7 (O&M Plan for Baghouses) referencing this emission unit to emission points for clarity.

150. Added **Condition L.7** (Opacity Monitoring Requirements) identifying NESHAP Subpart LLL of 40 CFR 63 opacity monitoring requirements.

151. Added **Condition L.8** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.

152. Revised **Condition L.9** (O&M Plan for Baghouses) to clarify emission points.

153. Added **Conditions L.10 – L.13** stating that this emission unit is subject to the applicable requirements of NSPS Subpart F and Subpart DDDD of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.

Subsection M. In-Line Kiln/Raw Mill – Line 2 (EU 010)

154. Updated the permitting note for this emission unit identifying this that this emission unit is now regulated under NSPS Subpart DDDD of 40 CFR 60 and no longer subject to NSPS Subpart F of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.

155. Added a permitting note under Emission Limitations and Standards identifying Table 1-1, Summary of Air Pollutant Standards and Terms summarizing information for convenience purposes only.

156. Revised the table in **Condition M.2** (Pollutant Emissions Limits) by added applicable compliance methods and removing NESHAP Subpart LLL of 40 CFR 63 requirements since this emission unit is subject to NSPS Subpart DDDD of 40 CFR 60. Air Construction Permit No. 0010087-049-AC (PSD-FL-350E) revised **the** visible emission compliance method by removing the annual visible emission test for Kiln No. 2 since this emission unit is equipped with a COMS.

157. Removed **Condition M.2.b** (Pollutant Emission Limits (After 09/09/2013)) since this emission unit is no longer subject to NESHAP Subpart LLL of 40 CFR 63.

158. Revised **Condition M.3** (PM) by removing compliance information regarding NESHAP Subpart LLL of 40 CFR 63 since this emission unit is no longer subject to this subpart.

159. Revised **Condition M.11** (Mercury into the Pyroprocessing System Limited) by removing the statement that this emission limit no longer applies. This requirement is required based on the established BACT.

160. Revised **Condition M.14** (COMS) stating that the COMS is required by BACT.

161. Removed **Conditions M.14.b** (CEMS) requirements for THC since NESHAP Subpart LLL of 40 CFR 63 no longer applies to this emission unit.

162. Revised **Condition M.16** (CEMS Requirements (THC)) for clarity.

163. Added permitting note under the test method and procedures subtitle identifying Table 2-1 summary of Compliance requirements.

164. Air Construction Permit No. 0010087-049-AC (PSD-FL-350E) revised **Condition M.17** (Performance Testing) by removing the requirements pertaining to NESHAP Subpart LLL of 40 CFR 63 since these regulations no longer applies to this emission unit.

165. Air Construction Permit No. 0010087-049-AC (PSD-FL-350E) revised **Condition M.18** (Emission Tests Required) by removing the annual visible emission test for Kiln No. 2 since this emission unit is equipped with a COMS. The test method for Dioxin/Furan and other pollutants within the permitting note was removed since this emission unit is no longer subject to NESHAP Subpart LLL of 40 CFR 63.

166. Added a title to **Condition M.19** (Testing and Operating Conditions).

167. Revised **Condition 20** (Malfunction of SNCR System) to correct a condition that was being referenced.

168. Corrected **Condition M.21** (Data Exclusion for CO) by removing the permitting note referencing 40 CFR 60 Subpart A since this note does not pertain to the condition.

169. Removed Conditions **M.24.a** (PM Emissions Tests (Continuous Emissions Monitors), **M.24.b** (HCl Emissions Tests), **M.24.c** (THC Emissions Tests (Continuous Emissions Monitors), **M.24.d** (Mercury (Hg) Continuous Emissions Monitors), and **M.26** (Clinker Production Monitoring Requirements (2010 NESHAPS) since this emission unit is no longer subject to NESHAP Subpart LLL of 40 CFR 63.

170. Removed an expiration date in **Condition M.24** (Material Balance Records of Mercury) since this requirement is required pursuant to BACT.

171. Added subtitle other requirements separating these regulations with the previous section.

172. Added **Condition M.26** (NSPS Requirements – Subpart DDDD) stating that this emission unit is subject to the applicable requirements of NESHAP Subpart DDDD of 40 CFR 60.

173. Removed **Condition M.29** (Common Conditions K.0 – K.4) since these common conditions do not apply to Kiln No. 2.

Subsection N. Clinker Handling – Line 2 (EU 011)

174. Updated the permitting note under the emission unit description.

175. Added a permitting note under Emission Limitations and Standards identifying Table 1-1, Summary of Air Pollutant Standards and Terms summarizing information for convenience purposes only.

176. **Condition N.2** (PM) combined **Conditions N.2.a** (PM) and **N.2.b** (PM) for clarity and the following revisions were made: removed the expiration date in **Condition N.2.a** (PM) since this condition was establish as BACT; and incorporated the new PM emission limit in accordance with NESHAP Subpart LLL of 40 CFR 63.

177. Revised the table in **Condition N.3** (Pollutant Emissions Limits (All EPs)) by including compliance methods and the PM and visible emission limits pursuant to NESHAP Subpart LLL of 40 CFR 63. Note 1 was revised to state by meeting the new more stringent PM emissions limit effective 9/9/2015 will demonstrate compliance with the BACT limit. Note 2 Air Construction Permit No. 0010087-049-AC revised this condition by removing the annual visible emissions test for emission point 2K15 since this emission point is equipped with a COMS. Note 3 was revised to include the visible emissions limit pursuant to NESHAP Subpart LLL of 40 CFR 63.

178. Added a permitting note under the test method and procedures subtitle identifying Table 2-1 summary of Compliance requirements.

179. The following revisions were made to **Condition N.5** (Emission Tests Required): Air Construction Permit No. 0010087-049-AC (PSD-FL-350E) revised this conditions by removing the annual visible emission test for clinker cooler No. 2 (EP 2K15) since this emission unit is equipped with a COMS; future testing requirements was added for PM testing pursuant to NESHAP Subpart LLL of 40 CFR 63; and Method 22 was added for the monthly testing requirements pursuant to NESHAP Subpart LLL of 40 CFR 63.

180. Added **Condition N.6** (Visible Emissions (EPs 2L03, 2L12, 2L13, 2L15, 2L16 and 2L18)) identifying the required testing requirements.

181. Removed **Condition N.6** (Material Storage and Handling Activities) effective 9/9/2013 per applicant request.

182. Added **Condition N.7** (PM (CPMS)) effective 9/9/2015 requiring the clinker cooler stack to be equipped with a CPMS pursuant to NESHAP Subpart LLL of 40 CFR 63.

183. Added **Condition N.8** (Open Clinker Storage Pile) pursuant to NESHAP Subpart LLL of 40 CFR 63.

184. Added **Condition N.9** (Monthly Visible Emissions - EPA Method 22 (EPs 2L03, 2L12, 2L13, 2L15, 2L16 and 2L18)) identifying the monthly visible emission testing requirements pursuant to NESHAP Subpart LLL of 40 CFR 63.

185. Added **Condition N.10** (Work Practices During Startup and Shutdown) pursuant to NESHAP Subpart LLL of 40 CFR 63.

186. Added **Condition N.11** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.

187. Added subtitle other requirements separating these regulations with the previous section.

188. Added **Condition N.12** (NSPS Requirements - Subpart F) and **N.13** (NESHAP Requirements - Subpart LLL) stating that this emission unit is subject to the applicable requirements of NSPS Subpart F of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.

189. Extended the NESHAP Subpart LLL compliance date for the clinker cooler and added specific conditions laying out project milestones and reporting requirements. Specifically, the following conditions were added: **Condition N.14** (Compliance Date Extension); **Condition N.15** (Key Milestones); **Condition N.16** (Progress Reports); and **Condition N.17** (Cement MACT Initial Compliance).

Subsection O. Finish Grinding Operation- Line 2 (EU 012)

190. Air Construction Permit No. 0010087-049-AC removed emission point 2M08 (Clinker/additives to Mill #2) form the emission unit description since this emission point no longer exists.

191. Updated the regulations in the permitting note under the description.

192. Added a permitting note under Emission Limitations and Standards identifying Table 1-1, Summary of Air Pollutant Standards and Terms summarizing information for convenience purposes only.

193. Air Construction Permit No. 0010087-049-AC removed emission point 2M08 (Clinker/additives to Mill #2); therefore, **Condition O.2** (PM) and **O.3** (PM_{10}) limits in lb/hour and ton/year were reduced accordingly.

194. Added visible emission limit in **Condition O.4** (Visible Emissions) pursuant to NSPS Subpart F of 40 CFR 60.

195. Combined **Conditions O.5.a** (Continuous Opacity Compliance (All Emission Points) with **O.5.b** (Emission Points 2N09 and 2N12) under **Condition O.9** (Opacity Monitoring Requirements (Each EP)) for clarity with the following revisions: added the current opacity requirements and noted the future effective requirements in a permitting note; and included additional monitoring requirement for the finish mill.

196. Added a permitting note under the test method and procedures subtitle identifying Table 2-1 summary of Compliance requirements.

197. Added **Condition O.8** (Visible Emissions (Each EP) identifying the visible emissions requirements.

198. Removed old **Condition O.10** since this condition was added under **Condition O.8** (Visible Emissions (Each EP).

199. Added **Condition O.10** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.

200. Added subtitle other requirements separating these regulations with the previous section.

201. Added **Conditions O.12** and **O.13** stating that this emission unit is subject to the applicable requirements of NSPS Subpart F of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.

Subsection P. Cement Load-Out Silos 6 and 7 (EU 013)

202. Updated the regulations in the permitting note under the description.

203. Added a permitting note under Emission Limitations and Standards identifying Table 1-1, Summary of Air Pollutant Standards and Terms summarizing information for convenience purposes only.

204. Revised **Condition P.4** (Visible Emissions) to include the opacity limit pursuant to NESHAP Subpart LLL of 40 CFR 63.

205. Replaced **Condition P.5.a** with **P.5** (Continuous Opacity Compliance) pursuant to NESHAP Subpart LLL of 40 CFR 63.

206. Revised **Condition P.7** (Visible Emissions) identifying the visible emissions testing requirements.

207. Added **Condition P.8** (Opacity Monitoring Plan) pursuant to NESHAP Subpart LLL of 40 CFR 63.

208. Added subtitle other requirements separating these regulations with the previous section**.**

209. Added **Conditions P.9** and **P.10** stating that this emission unit is subject to the applicable requirements of NSPS Subpart F of 40 CFR 60 and NESHAP Subpart LLL of 40 CFR 63.

Subsection Q. Coal Handling and Grinding Operations – Mill 2 (EU 014)

210. Added a permitting note under Emission Limitations and Standards identifying Table 1-1, Summary of Air Pollutant Standards and Terms summarizing information for convenience purposes only.

211. Added NESHAP Subpart LLL of 40 CFR 63 visible emission limit to **Condition Q.7** (Visible Emissions).

212. Revised **Condition Q.7** (Visible Emissions) to include the opacity limit pursuant to NSPS Subpart Y of 40 CFR 60.

213. Added subtitle other requirements separating these regulations with the previous section.

214. Added **Condition Q.11** stating that this emission unit is subject to the applicable requirements of NSPS Subpart Y of 40 CFR 60.

Subsection R. Emergency Diesel Engine (1,150 HP) (EU 017)

215. Revised the subsection by reducing the number of regulated emergency engines from three to two since one engine is an unregulated emission unit and separated the regulated emergency engine and fire pump into individual subsections.

Subsection S. Emergency Fire Pump (83 HP) (EU 019)

216. New subsection identifying the existing fire pump and the applicable regulations.

Appendices

217. Updated the appendices by removing the NESHAP Subpart LLL of 40 CFR 63 2006 and 2010 versions and including the new version of NESHAP Subpart LLL of 40 CFR 63 and NSPS Subparts DDDD and IIII of 40 CFR 60.

CONCLUSION

This project revises the renewed Title V air operation permit No. 0010087-041-AV, which was effective on June 26, 2012. This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, and 62-213, F.A.C.