STATEMENT OF BASIS

Mr. Kevin Baird, President Cement & Aggregate Operations
Tarmac America, LLC.
Pennsuco Complex
Facility ID No.: 0250020
Miami-Dade County

Title V Air Operation Permit Revision
PROPOSED Permit Project No.: 0250020-033-AV

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

The subject of this permit is the revision of Title V Air Operation Permit No. 0250020-026-AV to incorporate the terms and conditions of the Air construction Permit Nos. 0250020-025-AC, and 020020-030-AC.

Air construction permit No. 0250020-025-AC was issued to authorize multiple process and operation changes as follows:

1. Operational flexibility to store and unload cementitious material in the existing cement silos, loadout operations, and packhouse (Emissions Units 014 – 016).
2. Addition of a cementitious material sack loadout system (Emissions Unit 032) in the distribution silos for loading various size sacks (approximately 1,000 – 5,000 pounds) with cementitious material.
3. Removal of dust collector ID. No. 311.BF950 from the Raw Material Handling & Storage (Emissions Unit 029) since it was no longer in service and was removed from operations.
4. Installation of a coal tripper on the coal conveyor system to drop coal into trucks for unloading and storage outside the Southeast corner of the Material Storage Building (MSB) (Emissions Unit 031).
5. Use a mobile sack loadout device (Emissions Unit 033) for loading various size sacks (approximately 1,000 – 5,000 pounds) with cementitious materials. Emissions will be controlled by a portable (Model No. DC1400) dust collector.
6. Loading cementitious material from railcars into trucks (Emissions Unit 034). Particulate Matter (PM) emissions from this mobile operation will be controlled by a portable dust collector (Model No. DC1400) from the pneumatic transfer of material into the trucks and railcars.
7. Addition of a clinker loadout operation in the finish mill building (Emissions Unit 035).
8. Permanent use of calcium carbonate ($CaCO_3$) residuals as a raw material supplement in the clinker production process.
9. Installation of one (1) 475 HP diesel fired air compressor (Emissions Unit 036). The air compressor will be used as a backup unit in the event of power outage or equipment maintenance for the cement packhouse (Emissions Unit 016), cement silos (Emissions Units 014, and 015), and cementitious material sack loadout operations (Emissions Units 032, and 033).

The applicant stated in a correspondence received March 28, 2012 that construction of the clinker loadout operation in the finish mill building (Emissions Unit 035) was not completed. Therefore, this emissions unit will not be incorporated into this Title V Air Operation Permit Revision.
Air construction permit No. 0250020-030-AC was issued to authorize minor process and operation changes as follows:

1. Addition of a secondary feed system to the pyroprocessing system (Emissions Unit 028). Tarmac America is proposing to return residual process material (RPM), which includes off-specification clinker and the dust generated from the kiln at the plant, through the new secondary feed system to the pyroprocess. The goal is to re-introduce these RPM developed by the manufacturing process without compromising the quality of the final product.
2. Addition of one (1) 535 HP diesel fuel fired portable crusher to the aggregate plant (Emissions Unit 022). The crusher will be used to crush limestone mined on-site at the Pennsuco complex.
3. Update the list of emission points for the aggregate plant (Emissions Units 022 and 023).
4. Update the fugitive emissions (Emissions Unit 031) to add the new activities, and update the emissions table.

The applicant stated in a correspondence received March 28, 2012 that construction the secondary feed system to the pyroprocessing system (Emissions Unit 028) was not completed. Therefore, the secondary feed system will not be incorporated into this Title V Air Operation Permit Revision.

THE FACILITY CONSISTS OF THE FOLLOWING EMISSIONS UNITS

Emissions Unit No.	Brief Emissions Unit Description
010	Finish Mill System: Finish Mill No. 1
011	Finish Mill System: Finish Mill No. 2
012	Finish Mill System: Finish Mill No. 3
013	Finish Mill System: Finish Mill No. 4
030	Finish Mill System: Finish Mill No. 6
014	Cement Handling System: Cement Storage Silos. 1 through 12
015	Cement Handling System: Cement Distribution, Rail and Truck Loadout/ Mobile Cementitious Materials Sack Loadout System
016	Cement Handling System: Cement Packhouse
022	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant Subject to 40 CFR 60, Subpart OOO
023	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant NOT Subject to 40 CFR 60, Subpart OOO
024	Concrete Block Plant
025	Two Concrete Batch Ready Mix Plants
026	Coal Handling System
027	Clinker Handling and Storage System
028	Pyroprocessing/Raw Mill System
029	Raw Material Handling System
031	Unregulated Emissions Units and/or Activities: Fugitive Emissions

032	Cementitious Sack Loadout System
034	Transloading of Cementitious Material
036	Emergency Diesel Fuel Fired Air Compressor
038	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 63, Subpart ZZZZ
039	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 60, Subpart IIII

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

The CAM rule requires owners and operators to monitor the operation and maintenance of their control equipment so that they can evaluate the performance of their control devices and report whether or not their facilities meet established emission standards.

The facility is subject to a particulate matter Compliance Assurance Monitoring Plan (CAM) for the main air pollution particulate control device (APCD) and stack for the kiln/cooler/raw mill/coal mill system.

The combined exhaust from raw mill, clinker cooler, kiln and coal mill is processed through a series of cyclones and then the large baghouse prior to exiting the main stack. That baghouse has a capacity greater than 500,000 actual cubic feet per minute. All dust from those cyclones and the baghouse constitute the feed to pyroprocessing. Particulate emissions from the main stack are subject to at least four emissions limiting standards including:

- A visible emissions limitation of 10 percent opacity;
- The total of the NESHAP/MACT (40CFR63, Subpart LLL) particulate emission limit of 0.4 lb/ton of feed. This is comprised of 0.3 and 0.1 lb/ton feed for the kiln and clinker cooler respectively;
- The guaranteed specification from the supplier of 0.125 lb/ton of feed; and
- The permitted PSD avoidance limits of 0.063 and 0.053 lb/ton of feed for PM and PM_{10} respectively.

A CAM Plan has been included in the PROPOSED Title V Operation Permit Renewal as Appendix CAM and is based on action plans that are triggered by COMS opacity measurements greater than 5%. Excursions trigger an inspection, corrective action, and a record keeping requirement. Corrective action will be taken as necessary and in accordance with the procedures supplied by the baghouse manufacturer or the internal Inspection and Maintenance Program.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

Based on the Title V Air Operation Permit Revision application received March 15, 2012, this facility is a major source of hazardous air pollutants (HAPs).

<u>These documents are on file with the permitting authority:</u>
Title V Air Operation Permit Revision issued September 22, 2008
Application for a Title V Air Operation Permit Renewal received March 15, 2010
Application for a Title V Air Operation Permit Revision received March 15, 2012

Specific changes were made to the previously issued Title V Air Operation Permit, and are reflected in the PROPOSED Title V Permit Revision as described in the following pages.

Items numbered 1-13 below represent the changes to the previous Title V Air Operation Permit. Underline text indicates additions. .

1. Recent organizational changes have occurred within the Miami-Dade County Government and the Permitting, Environment and Regulatory Affairs (PERA) has become the Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management. As a result, all references to PERA in the permit have been changed to RER.

2. Changes in the Table of Contents, Section III – Emissions Unit(s) Specific Conditions. Subsection K that previously listed Common Conditions has been renamed Cementitious Material Loadout. Common Conditions which were listed under Subsection K are now listed under Subsection M. Subsection L lists the Emergency Diesel-fired Air Compressor.

3. Changes in Section I – Subsection B, Summary of Emissions Unit ID No(s). and Brief Description(s). The incorporation of air construction permit No. 0250020-025-AC, and Appendix I required that the table be updated as follows:

E.U. ID No.	**Brief Description**
010	Finish Mill System: Finish Mill No. 1
011	Finish Mill System: Finish Mill No. 2
012	Finish Mill System: Finish Mill No. 3
013	Finish Mill System: Finish Mill No. 4
030	Finish Mill System: Finish Mill No. 6
014	Cement Handling System: Cement Storage Silos. 1 through 12
015	Cement Handling System: Cement Distribution, Rail and Truck Loadout/Mobile Cementitious Material Sack Loadout System
016	Cement Handling System: Cement Packhouse
022	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant Subject to 40 CFR 60, Subpart OOO
023	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant NOT Subject to 40 CFR 60, Subpart OOO
024	Concrete Block Plant
025	Two Concrete Batch Ready Mix Plants
026	Coal Handling System
027	Clinker Handling and Storage System
028	Pyroprocessing/Raw Mill System
029	Raw Material Handling System
031	Unregulated Emissions Units and/or Activities: Fugitive Emissions
032	Cementitious Sack Loadout System
034	Transloading of Cementitious Material
036	Emergency Diesel Fuel Fired Air Compressor
038	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 63, Subpart ZZZZ
039	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 60, Subpart IIII

4. Changes in Section III – Subsection A, Emissions Unit Specific Conditions, Emissions Unit 029 – Cement Plant Raw Material Handling System. The incorporation of air construction permit No. 0250020-025-AC required that the following Specific Condition be added:

   A.0. Rule Applicability: This emissions unit shall comply with all the applicable standards contained in 40 CFR 63 Subpart LLL – National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry, and 40 CFR 63 Subpart A – General Provisions.
   [40 CFR 63.1340

   Other Specific Conditions have been renumbered accordingly, and cite air construction permit No. 0250020-025-AC also.

5. Changes in Section III – Subsection B, Emissions Unit Specific Conditions, Emissions Unit 028 – Cement Plant Pyroprocessing and Raw Mill System. The incorporation of air construction permit No. 0250020-025-AC that allows permanent burn of calcium carbonate required that the following Specific Conditions be added:

   B.3.a. Calcium Carbonate as Raw Material Supplement: The amount of calcium carbonate residuals used as a raw material supplement shall not exceed 10 percent of the total raw material feed.
   [Rule 62-4.070(3), F.A.C., and Permit No. 0250020-025-AC]

   B.3.b. Calcium Carbonate Source: The permittee is hereby authorized to use $CaCO_3$ residuals from the lagoons of the Miami-Dade County Water Treatment Plants as a raw material supplement in the clinker production process. Use of $CaCO_3$ residuals from any other source shall require prior written approval from the RER. The material shall be subject to analytical testing requirements as determined by the RER.
   [Rule 62-4.070(3), F.A.C., and Permit No. 0250020-025-AC]

   B.16. Calcium Carbonate Usage Records: The permittee shall establish a log to document the following:
   - The amount and percentage of calcium carbonate residuals used as a raw material supplement
   - The total calcium carbonate input on a monthly basis
   - The total feed amount on a monthly basis
   - The total calcium carbonate input on a consecutive 12-month basis
   - The total feed amount on a consecutive 12-month basis

   [Rule 62-4.070(3), F.A.C., and Permit No. 0250020-025-AC]

   B.17. PSD Pollutant Emissions Monitoring, Reporting and Recordkeeping: The permittee shall monitor the emissions of any PSD pollutant that the RER identifies (PM, PM_{10}, CO, NO_X, and SO_2) could increase as a result of the construction or modification and that is emitted by any emissions unit that could be affected; and, using the most reliable information available, calculate and maintain a record of the annual emissions, in tons

per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations if the change increases the design capacity of that emissions unit or its potential to emit that PSD pollutant. Emissions shall be computed in accordance with Rule 62-210.370, F.A.C.
[Rules 62-212.300(1)(e)1, 62-4.070(3), F.A.C., and Permit No. 0250020-025-AC]

B.18. Additional PSD Pollutant Record Keeping & Reporting: The permittee shall report to the RER within sixty (60) days after the end of each year during which records must be generated under subparagraph 62-212.300(1)(e)1., F.A.C., setting out the unit's annual emissions during the calendar year that preceded submission of the report. The report shall contain the following:
a. The name, address and telephone number of the owner or operator of the major stationary source;
b. The annual emissions as calculated pursuant to subparagraph 62-212.300(1)(e)1., F.A.C.
c. If the emissions differ from the preconstruction projection, an explanation as to why there is a difference.
d. Any other information that the owner or operator wishes to include in the report.
[Rules 62-212.300(1)(e)1, 62-4.070(3), F.A.C., and Permit No. 0250020-025-AC]

Subsequent Specific Conditions have been renumbered accordingly, and cite air construction permit No. 0250020-025-AC also.

6. Changes in Section III – Subsection E, Emissions Unit Specific Conditions, Emissions Unit 014, 015, and 016 – Cement Plant Storage Silos 1 through 12, Cement Plant Distribution Rail Truck Load, and Cement Plant Packhouse. The incorporation of air construction permit No. 0250020-025-AC required that the following note, and Specific Condition be added under the table of emissions units:

Note: These emissions units are also permitted to store and unload cementitious materials. Cementitious materials include Type I cement, masonry cement, fly ash, slag cement, natural and synthetic gypsum, lime, and cement kiln dust.

E.0.___ Rule Applicability: This emissions unit shall comply with all the applicable standards contained in 40 CFR 63 Subpart LLL – National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry, and 40 CFR 63 Subpart A – General Provisions.
[40 CFR 63.1340]

Subsequent Specific Conditions have been renumbered accordingly, and cite air construction permit No. 0250020-025-AC also.

7. Changes in Section III – Subsection G, Emissions Unit Specific Conditions, Emissions Unit 031 – Facility Fugitive Emissions. The incorporation of air construction permit Nos. 0250020-025-AC, and 0250020-030-AC required that the emissions unit description, and PM emissions summary table be updated as follows:

ARMS Emissions Unit No.	**Brief Description of Emissions Unit and/or Activities**
031	Facility-wide particulate matter fugitive emissions from miscellaneous activities, such as truck operations throughout the facility, wind erosion, coal tripper system, etc. Fugitive Emissions – Transportation, Miscellaneous Transfers, Crushing, and Storage

Activity	**Description**	**Estimated Emissions (PM and PM_{10})***
Coal Handling	Drop Operations	23 and 11 TPY
Coal Handling	Vehicular Traffic	1.0 and 0.26 TPY
Raw Material Blending	Drop Operations	1.2 and 0.57 TPY
Raw Material Blending	Vehicular Traffic	3.6 and 0.92 TPY
Calcium Carbonate Residuals	Vehicular Traffic	8.7 and 2.1 TPY
Portable Crusher Limestone Handling	Drop Operations	5.1 and 2.4 TPY
Portable Crusher Limestone Handling	Vehicular Traffic	7.8 and 2.0 TPY
Total Quantifiable Emissions	Fugitive Emissions	27.6 and 7.6 TPY

* The estimates given were included in calculations by the applicant demonstrating that the modernization and production increase projects related to the cement plant do not trigger PSD (Permit No. 0250020-017-AC). It is not practicable to actually measure the emissions directly. The previous estimates given for the modernization and production increase projects have been updated based on the revised fugitive emissions provided by the applicant for projects (Permit No. 0250020-025-AC, and 0250020-030-AC) for the above-mentioned operations. Fugitive emissions from portable limestone crushing, and transporting calcium carbonate residuals have also been added. Reasonable assurance that these emissions are controlled to the levels given above is by adherence to the Reasonable Precautions listed below. (specific conditions 1-4).

[Permit Nos. 0250020-017-AC, 0250020-025-AC & 0250020-030-AC]

8. Changes in Section III – Subsection H, Emissions Unit Specific Conditions, Emissions Unit 022, and 023 – Aggregate Plant Operations. The incorporation of air construction permit No. 0250020-030-AC required that the emissions unit description be updated as follows:

ARMS Emissions Unit No.	**Emissions Unit Description**
022	Nonmetallic Mineral Processing Plant Equipment and Operations at the Aggregate Plant Subject to 40 CFR 60, Subpart OOO **<u>Diesel-fired Portable Crusher</u>** Manufacturer: Cummins Manufacture Date: 7/2007 Model No: QSX15, Family 7CEXL015.AAE Engine: Cummins No. 79256912 Displacement: 15L Power: 535 HP (398 kW)
023	Nonmetallic Mineral Processing Plant Equipment and Operations at the Aggregate Plant NOT Subject to 40 CFR 60, Subpart OOO

The following statement listed under this emissions unit description has been removed because this relates to permit history, and such information can be found under Appendix H-1: Permit History.

Since air construction permit No. 0250020-030-AC superseded Subsection C of previously issued air construction permit No. 0250020-027-AC that addressed this emissions unit, all Specific Conditions now cite air construction permit No. 0250020-030-AC only.

9. Changes in Section III – Subsection K, Common Conditions have been moved to Subsection M. The incorporation of air construction permit No. 0250020-025-AC required that Subsection K that previously listed Common Conditions be revised to address Emissions Unit 032 (Cementitious Material Sack Loadout System), and Emissions Unit 034 (Transloading of Cementitious Material) along with their Specific Conditions as follows. Common Conditions which were listed under Subsection K are now addressed under Subsection M.

10. Subsection K now addresses Emissions Unit 032 and 034.

K.0. <u>Rule Applicability</u>: This emissions unit shall comply with all the applicable standards contained in 40 CFR 63 Subpart LLL – National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry, and 40 CFR 63 Subpart A – General Provisions.
[40 CFR 63.1340]

K.1. <u>Hours of Operation</u>: These emissions units are allowed to operate 8,760 hours per year. [Permit No. 0250020-025-AC]

K.2. Cement Storage Silo/Packhouse/Loadout Process and Production Design Specifications: The maximum process input rate to each cement silo and loadout operation is 500 TPH on a 24-hour block average. The maximum production rate of cement in the Packhouse is 170 TPH on a 24-hour block average.
[Permit No. 0250020-025-AC]

Emissions Limitations, Test Methods and Performance Standards

K.3. Visible Emissions Limits: Visible emissions are limited to 5 percent from each of the above listed baghouses. Compliance shall be determined in the manner described in 40 CFR 63, Section 63.1350(a)(4)(i), (ii), (iii) and (iv) below except that the applicable standard is 5% instead of 10%. Numeration tracks the referenced CFR provision.

(4) Procedures to be used to periodically monitor affected sources subject to opacity standards under Sections 63.1346 and 63.1348. Such procedures must include the provisions of Paragraphs (a)(4)(i) through (a)(4)(iv) of this section.

(i) The owner or operator must conduct a monthly 1-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A to [40 CFR] Part 60 of this chapter. The test must be conducted while the affected source is in operation.

(ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iii) If no visible emissions are observed during the semi-annual test for any affected source, the owner or operator may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the owner or operator must resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six (6) consecutive monthly tests.

(iv) If visible emissions are observed during any Method 22 test, the owner or operator must conduct a 6-minute test of opacity in accordance with Method 9 of Appendix A to part 60 of this Chapter. The Method 9 test must begin within one hour of any observation of visible emissions.

[Permit No. 0250020-025-AC and; 40 CFR 63.1348]

{Note: The applicant advised that the baghouses are designed to control particulate emissions to 0.01 grains/actual cubic foot (gr/acf). The 5% opacity limitation is consistent with this design and provides reasonable assurance that annual emissions of PM/PM_{10} for all emission points in this emission unit system will be less than 7.6 TPY. This annual emission estimate is part of the facility-wide netting calculation to escape PSD applicability for PM/PM_{10}. Exceedance of the 5% opacity limit shall be deemed an exceedance of this permit condition and not necessarily an exceedance of the opacity limitations given in 40 CFR 63, Subpart LLL}

Test Procedures, Recordkeeping and Additional Requirements

K.4. Common and General Conditions: This emissions unit is subject to all applicable requirements of the attached Appendices, made part of the permit.

11. Section III – Subsection L, Emissions Unit Specific Conditions, Emissions Unit 036 – Emergency Diesel Fuel Fired Air Compressor. The incorporation of air construction permit No. 0250020-025-AC required that a new Subsection L be added along with its Specific Conditions as follows:

ID No.	Emissions Unit Description
036	**Emergency Diesel-fired Air Compressor** Manufacturer: Sullair No. 79300017083 Manufacture Date: 5/24/2005 Model No: 1600DTQ Engine: CAT Power Diesel Displacement: 15.2L Power: 475 HP (354 kW)

Note: The air compressor will be used as a backup unit in the event of power outage or equipment maintenance for the cement packhouse (EU 016), cement silos (EU 014, and 015), and cementious material sack loadout operations (EU 032).

The following specific conditions apply to the emissions unit(s) listed above:

Operational Requirements

L.0. Rule Applicability: This emissions unit shall comply with all the applicable standards contained in 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, and 40 CFR 63 Subpart A – General Provisions.
[40 CFR 63.6585]

L.1. Visible Emissions: The permittee shall not cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the opacity of which is equal to or greater than 20%.
[Rule 62-296.320(4)(b), F.A.C., and Permit No. 0250020-025-AC]

L.2. Diesel Fuel Usage Limit: The maximum diesel fuel usage rate shall not exceed 121,500 gallons in any consecutive 12-month period.
[Rule 62-4.070(3), F.A.C., and Permit No. 0250020-025-AC]

L.3. Operating Limitations: The permittee must operate the compressor according to the requirements in Table 2c of 40 CFR 63, Subpart ZZZZ below.
[40 CFR 63.6602, and Permit No. 0250020-025-AC]

For each…	The permittee must meet the following requirement, except during period of startup…	During periods of startup, the permittee must…
1. Emergency CI and black start CI.[1]	a. Change oil and filter every 500 hours of operation or annually, which ever comes first;[2] b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.[3]	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.[3]

[1]If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Table 2c of this subpart, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

[2]Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement in Table 2c of this subpart.

[3]Sources can petition the Administrator pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

MONITORING, INSTALLATION, COLLECTION, OPERATION, AND MAINTENANCE REQUIREMENTS

L.4. Operation and Maintenance: The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop an own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution practice for minimizing emissions. The permittee must install a non-resettable hour meter if one is not already installed. The permittee must also minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2c of 40 CFR 63, Subpart ZZZZ apply.
[40 CFR 63.6625(e),(f) & (h), and Permit No. 0250020-025-AC]

CONTINUOUS COMPLIANCE REQUIREMENTS

L.5. Monitoring and Data Collection:

(a) The permittee must monitor and collect data according to 40 CFR 63.6635.

(b) Except for monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must monitor continuously at all times that the stationary RICE is operating.

(c) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee must, however, use all the valid data collected during all other periods.

[40 CFR 63.6635, and Permit No. 0250020-025-AC]

L.6. Emissions and Operating Limitations:

(a) The permittee must demonstrate continuous compliance with each emission limitation and operating limitation in Table 2c of 40 CFR 63, Subpart ZZZZ that apply according to methods specified in Table 6 of 40 CFR 63, Subpart ZZZZ. In Table 6 for each existing stationary CI RICE not subject to any numerical emission limitations, complying with the requirement to work or management practices, the permittee must demonstrate continuous compliance by:

(i) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

(ii) Develop and follow the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(b) The permittee must report each instance in which the permittee did not meet each emission limitation or operating limitation in Table 2c of 40 CFR 63, Subpart ZZZZ. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.6650. If the permittee changes the catalyst, the permittee must reestablish the values of the operating parameters measured during the initial performance test. When the permittee reestablish the values of the operating parameters, the permittee must also conduct a performance test to demonstrate that the permittee is meeting the required emission limitation applicable to the permittee's stationary RICE.

(c) [Reserved]

(d) For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations that occur during the first 200 hours of operation from engine startup (engine burn-in period) are not violations. Rebuilt stationary RICE means a stationary RICE that has been rebuilt as that term is defined in 40 CFR 94.11(a).

(e) The permittee must also report each instance in which the permittee did not meet the requirements in Table 8 of 40 CFR 63, Subpart ZZZZ that apply. If the permittee own or operate a new or reconstructed stationary RICE with a site

rating of less than or equal to 500 brake HP located at a major source of HAP emissions (except new or reconstructed 4SLB engines greater than or equal to 250 and less than or equal to 500 brake HP), a new or reconstructed stationary RICE located at an area source of HAP emissions, or any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, the permittee does not need to comply with the requirements in Table 8 to this subpart: An existing 2SLB stationary RICE, an existing 4SLB stationary RICE, an existing emergency stationary RICE, an existing limited use stationary RICE, or an existing stationary RICE which fires landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis. If the permittee own or operate any of the following RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, the permittee does not need to comply with the requirements in Table 8 to this subpart, except for the initial notification requirements: a new or reconstructed stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis, a new or reconstructed emergency stationary RICE, or a new or reconstructed limited use stationary RICE.

(f) If the permittee own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, the permittee must operate the engine according to the conditions described in paragraphs (f)(1) through (4) of 40 CFR 63.4400.

(1) For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as permitted in 40 CFR 63.4400, is prohibited.

(2) There is no time limit on the use of emergency stationary RICE in emergency situations.

(3) The permittee may operate the emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(4) [Reserved]

[40 CFR 63.6640, and Permit No. 0250020-025-AC]

REPORTING AND RECORDKEEPING REQUIREMENTS

L.7. Report Type and Submittal Date:

(a) The permittee must submit each report in Table 7 of 40 CFR 63, Subpart ZZZZ that applies.

(b) Unless the Administrator has approved a different schedule for submission of reports under 40 CFR 63.10(a), the permittee must submit each report by the date in Table 7 of this subpart and according to the requirements in paragraphs (b)(1) through (b)(9) of 40 CFR 63.6650.

(1) For semiannual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for the affected source in 40 CFR 63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in 40 CFR 63.6595.

(2) For semiannual Compliance reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for the affected source in 40 CFR 63.6595.

(3) For semiannual Compliance reports, each subsequent Compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(4) For semiannual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(5) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR part 70 or 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of this section.

(6) For annual Compliance reports, the first Compliance report must cover the period beginning on the compliance date that is specified for the affected source in 40 CFR 63.6595 and ending on December 31.

(7) For annual Compliance reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for the affected source in 40 CFR 63.6595.

(8) For annual Compliance reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31.

(9) For annual Compliance reports, each subsequent Compliance report must be postmarked or delivered no later than January 31.

(c) The Compliance report must contain the information in paragraphs (c)(1) through (6) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.

(3) Date of report and beginning and ending dates of the reporting period.

(4) If the permittee had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.6605(b), including actions taken to correct a malfunction.

(5) If there are no deviations from any emission or operating limitations that apply to the permittee, a statement that there were no deviations from the emission or operating limitations during the reporting period.

(6) [Reserved]

(d) For each deviation from an emission or operating limitation that occurs for a stationary RICE where the permittee is not using a CMS to comply with the emission or operating limitations in this subpart, the Compliance report must contain the information in paragraphs (c)(1) through (4) of this section and the information in paragraphs (d)(1) and (2) of 40 CFR 63.6650.

(1) The total operating time of the stationary RICE at which the deviation occurred during the reporting period.

(2) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

(e) [Reserved]

(f) Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of this subpart along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in this subpart, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the RER.

[40 CFR 63.6650, and Permit No. 0250020-025-AC]

L.8. Recordkeeping:

(a) The permittee must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of 40 CFR 63.6655.

(1) A copy of each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(b) [Reserved]

(c) [Reserved]

(d) The permittee must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies.

(e) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan if the permittee own or operate any of the following stationary RICE;

(1) [Reserved]
(2) An existing stationary emergency CI RICE.
(3) [Reserved]

(f) If the permittee own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, the permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(1) An existing emergency stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.
(2) [Reserved]

[40 CFR 63.6655, and Permit No. 0250020-025-AC]

L.9. Diesel Fuel Records: The permittee shall maintain a log to document the rolling 12-month consumption of diesel fuel.
[Rule 62-4.070(3), F.A.C., and Permit No. 0250020-025-AC]

12. This item addresses the eight (8) emergency diesel fuel generators.
In a letter dated April 9, 2012, Tarmac representative requested to add these generators to the list of insignificant units/activities. Based on the information provided by Tarmac's staff on April 30, 2012, it was determined that the generators were subject to either Subparts ZZZZ or IIII. Specifically, the four (4) Marathon, and one (1) Cummins generators were subject to Subpart ZZZZ; and the two (2) Caterpillar, and one (1) Generac generators were subject to Subpart IIII. Since the emergency generators are subject to unit specific requirements in 40 CFR 63 Subpart ZZZZ, and 40 CFR 60 Subpart IIII, they cannot be considered as insignificant units and therefore cannot be added to Appendix I. Pursuant to FDEP Guidance Document dated September 3, 2008 regarding Permitting of Engines Subject to 40 CFR 60 IIII, 40 CFR 60 JJJJ, and 40 CFR 63 ZZZZ, two (2) new emissions units were created for the generators. Emissions Unit 038 will address the generators that are subject to Subpart ZZZZ, and Emissions Unit 039 will address the generators that are subject to 40 CFR 60 Subpart IIII. These emissions units will be attached to

the Title V Air Operation Permit as Appendix ICE – Requirements for Internal Combustion Engines as listed in the below table.

E.U. ID No.	Brief Description of Engine	Year Built	Horsepower	Rule Applicability
038	**Four (4) Marathon Manufactured Generators** Model No. 743FSM4370 Capacity: 1,649 kW Displacement: 60 L Date Ordered: 1/1/1999	N/A	2,212	ZZZZ
	One (1) Cummins Manufactured Generator Model No. 200DFP4XR8/10 Capacity: 233 kW Displacement: 12L Date Ordered: 3/1/1969	1969	312	ZZZZ
039	**Two (2) Caterpillar Manufactured Generators** Model No. 3412 Capacity: 800 kW Displacement: 27.03L Date Ordered: 1/1/2007	1999	1,072	IIII
	One (1) Generac Manufactured Generator Model No. 7007070100 Capacity: 20kW Displacement: 2.4L Date Ordered: 1/1/2007	2006	27	IIII

13. Other changes: Minor corrections to typographical errors, updates to emissions unit tables were made to include renumbering and references to some specific conditions.