Title V Air Operation Permit Revision
Permit No. 0310166-015-AV

APPLICANT

The applicant for this project is United States Gypsum Company. The applicant's responsible official and mailing address are: Mr. Mike Favo, Plant Manager, United States Gypsum Company, Jacksonville Plant, 6825 Evergreen Avenue, Jacksonville, FL 32208.

FACILITY DESCRIPTION

This facility consists of a manufacturing plant for the production of gypsum wallboard. Gypsum ore is received at the plant by ship or barge and unloaded into stockpiles. Gypsum ore is then conveyed to the crushing and conveying system. Crushed ore is dried and then conveyed to the landplaster system where the crushed gypsum is further ground in the Raymond mills. The finely ground and dried gypsum (known as landplaster) is conveyed to the stucco production area where the landplaster is introduced into calcining kettles which by indirect heating drives off the chemically bound water from the landplaster which turns it into a product called stucco. Stucco is then dry mixed with other additives and introduced to the pin mixer where water is added to the mix. The liquid stucco mix is then introduced between two sheets of paper (or glass mat) in the wallboard forming machine to form wallboard. The wet wallboard is dried on the conveying line at the wallboard dryer, cut, end-trimmed and stacked for distribution.

The facility also consists of a joint treatment compounds manufacturing operation using the major raw materials calcium carbonate, perlite, clay, and mica. These materials are delivered by railcar and stored in silos (EU Nos. 101 through 105). Raw materials from these silos are processed through the Wet and Dry Premixer System (EU 106) where the dry raw materials are mixed in dry premixers and then transferred to wet mixers where liquid additives are added to produce a paste. The paste proceeds from the wet mixers to the Joint Treatment Pail Fill Stations. Small quantities of other dry raw materials are added to the Dry Premixers from the Joint Treatment Bag Dumpstation (EU 107). These final products are shipped out for consumer use and are not used to manufacture wallboard. There are no crushers or grinding operations associated with the production of joint treatment compounds and this operation is not connected by conveyor to the crusher, screening operation nor grinding mills in the wallboard manufacturing operation, therefore the EUs (101-107) associated with the manufacture of joint treatment compounds are not subject to the provisions of New Source Performance Standards (NSPS), 40 Code of Federal Regulation (CFR) 60, Subpart OOO, Standards of Performance for Non-Metallic Mineral Processing Plants.

Emission Unit (EU) ID Nos. 006, 007, 039, 042, 058, 066, 077, 094, 097, 098, 099, 100, and 109 are down for the foreseeable future. The facility will complete compliance testing for these emissions units within 60 days after the initial startup of each emission unit. A report indicating the results of the required initial testing for each unit will be submitted to the Compliance Authority.

PROJECT DESCRIPTION

The purpose of this permit is to revise the Title V Air Operation Permit No. 0310072-021-AV to incorporate the terms and conditions of Construction Permit No. 0310072-022-AC issued on October 8, 2013, and Construction Permit No. 0310072-024-AC issued on March 3, 2014.

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Application for a Title V Air Operation Permit Revision received July 7, 2014
Notice of Intent to Issue Air Permit issued July 15, 2014
Public Notice Published July 24, 2014

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility has established a facility-wide emission limit for hazardous air pollutants (HAP) of less than 10 tons per year for any single HAP and less than 25 tons per year for total HAPs classifying it as a Synthetic Minor Source of HAPs.

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 not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C. The facility has established a facility-wide emission limit for PM and VOC of less than 250 tons per year each.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60, specifically 40 Code of Federal Regulation (CFR) 60, Subpart OOO, Standards of Performance for Non-Metallic Mineral Processing Plants, and Subpart UUU, Standards of Performance for Calciners and Dryers in Mineral Industries, and 40 CFR 60, Subpart A, General Conditions.

NESHAP: The facility does not operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 61.

The facility does operate emissions units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63, specifically National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) applies to Emissions Unit Nos. 039 (No. 5 & 6 Calcining Kettles), 048 (Rotary Rock Dryer), 057 (No. 7 Calcining Kettle), and 096 (No. 4 MBR Calcining Kettle).

The control technology description and monitoring approach for each emissions unit subject to CAM is the same and summarized as follows:

PM emissions are controlled by one baghouse, except in the case of EU 048 which is controlled by two baghouses. The effectiveness of the baghouses is evaluated with an annual stack test and opacity measurements from the baghouse stack. The pressure differential in inches of water will

be monitored continuously and recorded daily. Visible emissions from the dust collector's exhaust will be monitored weekly using EPA RM 22 or similar observations.

PROJECT REVIEW

Changes that were made as part of this revision: Incorporation of the terms and conditions of Construction Permit No. 0310072-022-AC issued on October 8, 2013, incorporation of the terms and conditions of Construction Permit No. 0310072-024-AC issued on March 3, 2014, the Appendices have been updated to reflect the current Title V permit format (Appendix TV-6 is replaced with Appendix TV- Title V General Conditions, Appendices RR- Facility-wide Reporting Requirements, TR- Facility-wide Testing Requirements have been added), the Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide Conditions are revised to reflect the changes to the statutes that went into effect for this year, and the Prevention of Accidental Releases Facility-wide condition is revised to reflect the correct reporting agency. Consistent with Guidance Number DARM, PER-13, the "Not Federally Enforceable" marking on the Objectionable Odor Facility-Wide Condition has been removed since the condition was a part of previously issued construction permits.

In order to provide better customer service and enhance the permitting experience, only those emission unit(s) (EUs) and activities identified within the scope of the permit application, EUs and activities affected by any federal regulation amendments identified above, revisions identified above, and permit format changes identified above appear in the EMISSIONS UNITS AND SPECIFIC CONDITIONS, and Appendices of the Draft/Proposed Title V Operation Permit. The FINAL permit is issued in its entirety.

TITLE V PERMIT FORMAT CHANGES:

- Appendix TV-6 is replaced with Appendix TV- Title V General Conditions
- Appendix RR- Facility-wide Reporting Requirements is added
- Appendix TR- Facility-wide Testing Requirements is added
- Appendix NSPS, Subpart A – General Provisions is added
- Appendix NSPS, Subpart OOO – is added
- Appendix NSPS, Subpart UUU- is added
- Appendix NESHAP, Part 63 Subpart ZZZZ is added
- Appendix NESHAP, Part 63 Subpart A- General Provisions is added
- The Annual Operation Report and Annual Emissions Fee Form and Fee Facility-Wide conditions are replaced as follows:

FW13. Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic

Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: **Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070.** Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013); and Rule 2.301, JEPB; Rule 2.501, JEPB]

{Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. ***A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.****}*

- The Prevention of Accidental Releases (Section 112(r) of CAA) Facility-Wide Condition is replaced as follows:

FW16. Prevention of Accidental Releases (Section 112(r) of CAA). If, and when, the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent electronically through EPA's Central Data Exchange system at the following address: https://cdx.epa.gov. Information on electronically submitting risk management plans using the Central Data Exchange system is available at: http://www.epa.gov/osweroe1/content/rmp/index.htm. The RMP Reporting Center can be contacted at: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

CONCLUSION

This project revises Title V air operation permit No. 0310072-021-AV. 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.