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**MAR 06 1998**

Southdown, Inc.  
Pensacola Cement Distribution Terminal  
**Facility ID No.:** 0330093  
Escambia County

Air Operation Permit  
**Permit No.:** 0330093-001-AO

Permitting Authority:  
Department of Environmental Protection  
Northwest District Office  
160 Governmental Center  
Pensacola, FL 32501-5794  
Telephone: 850/595-8364  
Fax: 850/595-8597

Drafted on February 24, 1998

Air Operation Permit  
Permit No.: 0330093-001-AO

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# Department of Environmental Protection

Lawton Chiles  
Governor

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

Virginia B. Wetherell  
Secretary

**Permittee:**  
Southdown, Inc.

**Permit No.:** 0330093-001-AO  
**Facility ID No.:** 0330093  
**SIC Nos.:** 50, 5032  
**Project:** Air Operation Permit

This permit is for the operation of the Pensacola Cement Distribution Terminal located at 110 Olive Road, Pensacola, Escambia County; UTM Coordinates: Zone 16, 475.7 km East and 3374.8 km North; Latitude: 30° 30' 24" North and Longitude: 87° 15' 12" West.

STATEMENT OF BASIS: This is a minor source renewal air operation permit issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The above named permittee is hereby authorized to perform the work or 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.

**Referenced attachments made a part of this permit:**

Appendix G-1, General Conditions

**Effective Date:** March 5, 1998

**Renewal Application Due Date:** January 4, 2003

**Expiration Date:** March 5, 2003

**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

**Ed K. Middleswart, P.E.**  
**Air Program Administrator**

EKM/om

**Section I. Facility Information.**

**Subsection A. Facility Description.**

This facility is a cement distribution terminal including six 208 ton capacity silos. Cement is received in rail cars. The rail cars are unloaded by one of two methods, either by a pneumatic conveyor or by a pneumatic transfer pump into any of the six silos. Particulate emissions during loading of the silos are controlled by bag house filters, one per silo. Transporter trucks are loaded from the six silos through air slides and a loading spout. Fugitive dust from the truck loader spout is ventilated back into the baghouse filter on Silo 2. Dust collected in each of the baghouse filters is conveyed back into its respective silo.

Based on the permit application received, this facility is not a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No. and Brief Description.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-001	Cement Distribution Terminal.

*Please reference the Facility ID No. on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

These documents are on file with permitting authority:

Permit Application received 2/9/98

Additional Information Response received February 25, 1998

**Section II. Facility-wide Conditions.**

**The following conditions apply facility-wide:**

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall be used. *MAA*  
[Rule 62-296.320(4)(c)2., F.A.C.]
5. Sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.  
[Rule 62-4.090, F.A.C.]
6. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364 during normal working hours.  
[Rules 62-210.700 and 62-4.130, F.A.C.]

**Section III. Emissions Unit(s) and Conditions.**

**Subsection A. This section addresses the following emissions unit.**

**E.U.**

<b><u>ID No.</u></b>	<b><u>Brief Description</u></b>
-001	Cement Distribution Terminal

This facility is a cement distribution terminal including six 208 ton capacity silos. Cement is received in rail cars. The rail cars are unloaded by one of two methods, either by a pneumatic conveyor or by a pneumatic transfer pump into any of the six silos. Particulate emissions during loading of the silos are controlled by bag house filters, one per silo. Transporter trucks are loaded from the six silos through air slides and a loading spout. Fugitive dust from the truck loader spout is ventilated back into the baghouse filter on silo 2. Dust collected in each of the baghouse filters is conveyed back into its respective silo. This facility is regulated per Rule 62-210.300, F.A.C.

**The following specific conditions apply to the emissions unit listed above:**

**Essential Potential to Emit (PTE) Parameters**

**A.1. Hours of Operation.** This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.  
[Rule 62-4.160(2) and Rule 62-210.200(PTE), F.A.C.]

**Emission Limitations and Standards**

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.2.** Visible emissions shall not exceed 5% opacity.  
[Rule 62-297.620(4), F.A.C.]

**Test Methods and Procedures**

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

**A.3.a.** Visible Emissions tests are required to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with EPA method 9. Such tests shall be conducted once per year during the period from February 1 to March 31. Results shall be submitted to the Department within 45 days after testing. The Department shall be notified at least 15 days prior to testing to allow witnessing.

A 30 minute test while loading each silo (No. 1 through No. 6) and a 30-minute test for baghouse 2 while loading truck transporter. Up to three visible emissions tests may be run simultaneously if the stipulated operating functions are normally conducted simultaneously. [Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

**A.3.b.** The test reports shall comply with applicable portions of F.A.C. Rule 62-297.310, Test Reports. The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing. [Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

**A.3.c.** Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department. [Rules 62-297.310(2) and 62-4.070, F.A.C.]

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
  - a. Having access to and copying any records that must be kept under the conditions of this permit;
  - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
  - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

- c. Records of monitoring information shall include:
- the date, exact place, and time of sampling or measurement;
  - the person responsible for performing the sampling or measurement;
  - the date(s) analyses were performed;
  - the person responsible for performing the analyses;
  - the analytical techniques or methods used; and
  - the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

**Table 1-1, Summary of Air Pollutant Standards and Terms**

Southdown, Inc.  
Pensacola Cement Distribution Terminal

DRAFT Permit No.: 0330093-001-OA  
Facility ID No.: 0330093

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No. Brief Description**  
001 Cement Distribution Terminal

Pollutant Name	Fuel(s)	Hours/Year	Allowable Emissions			Equivalent Emissions*		Regulatory Citation(s)	See permit condition(s)
			Standard(s)	lbs./hour	TPY	lbs./hour	TPY		
Particulate Matter		8760	Opacity of not more than 5%					62-297.620(4), F.A.C.	A.2.

Notes:

\* The "Equivalent Emissions" listed are for informational purposes only.

**Table 2-1, Summary of Compliance Requirements**

**Southdown, Inc.  
Pensacola Cement Distribution Terminal**

**DRAFT Permit No.: 0330093-001-O  
Facility ID No.: 0330093**

This table summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.

**E.U. ID No.    Brief Description**  
001                    Cement Distribution Terminal

Pollutant Name or Parameter	Fuel(s)	Compliance Method	Testing Time Frequency	Frequency Base Date *	Min. Compliance Test Duration	CMS**	
						CMS**	See permit condition(s)
Particulate Matter		Visual Emissions Test	Annually	Feb 1 - Mar 31	30 mins		A.3.

Notes:

\* The frequency base date is established for planning purposes only; see Rule 62-297.310, F.A.C.

\*\*CMS [=] continuous monitoring system