DRAFT Title V Air Operation Permit Revision
Permit No. 0390005-016-AV

APPLICANT

The applicant for this project is BASF Corporation. The applicant's responsible official and mailing address are: Mr. Anthony L. Fedd, Site Manager, BASF Corporation, Quincy Operations, 1101 North Madison Street, Quincy, Florida 32352.

FACILITY DESCRIPTION

This facility is an Attapulgite Clay and Fullers Earth processing plant and consists of a raw clay receiving area, a primary crusher, crude granular clay and crude gelling clay covered storage areas, and granular clay and gelling clay product process lines. Granular processing essentially consists of crushing, drying, sizing and packing. Gel processing consists essentially of crushing, extruding with additives (magnesium oxide), drying/milling, classifying and packing. Emissions of particulate matter resulting from clay handling and processing are controlled by baghouses. Some of the natural gas or propane-fired equipment (Granular Clay Kilns, Gelling Clay Hammermills) is controlled by scrubbers.

The facility includes emissions units subject to NSPS (40 CFR 60 subpart OOO) as a result of the date of construction of the affected equipment. These emissions units have particulate emissions controlled by a baghouses and include the Gel Clay Production Equipment, and the ACM Milling/Ultra Fine Grind Equipment. The permit limits are comparable or more stringent than those required by NSPS and include 5% opacity limits. The clay mining areas are not contiguous with the process plant areas, and are not included in this Title V Facility permit.

The facility is subject to a facility-wide limit of 124 tons per year of NOx associated with a BACT determination for the construction of the north and south fluid bed dryers (Construction Permits AC20-41424 and AC2041425, issued August 4, 1981).

Since BASF has a potential-to-emit of greater than 250 tons per year of PM (297 tons/yr), the facility is a major source under Prevention of Significant Deterioration (PSD) and any future modifications and/or construction must be evaluated with respect to the preconstruction review requirements of Chapter 62-212, F.A.C. This facility is not a major source of hazardous air pollutants (HAP).

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

PROJECT DESCRIPTION

The purpose of this permitting project is to revise the existing Title V permit for the above referenced facility and to incorporate the terms and conditions of air construction permit No. 0390005-015-AC, being concurrently processed, for the installation of replacement pneumatic transporters

PROCESSING SCHEDULE AND RELATED DOCUMENTS

Initial Title V Air Operation Permit issued March 16, 1999
Application for a Title V Air Operation Permit Revision received March 18, 2011

PRIMARY REGULATORY REQUIREMENTS

Title III: The facility is not identified as a major source of hazardous air pollutants (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 Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does not operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

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

Siting: N/A

CAM: Compliance Assurance Monitoring (CAM) applies to Emissions Units 002, 008 and 019 are subject to CAM and associated monitoring requirements. These include monitoring the scrubber pressure differentials and liquid water flows.

Emission units 014 and 015 are subject to CAM and associated monitoring requirements. These include monitoring the scrubber pressure differentials and liquid water flows.

Emission units 029 and 030 are subject to CAM and associated monitoring requirements. These include monitoring the baghouse pressure differentials and conducting visible emissions monitoring if the pressure differentials fall outside the specified range.

PROJECT REVIEW

This revision incorporates permit 0390005-015-AC that allowed modifications to emissions units 022, 023 and 024 that included the installation of a new Cyclonaire Pneumatic Transporter, modifying the existing pneumatic transporters, Con 100 and Con 500 plus additional modifications. These pneumatic transporters and the rotary valve have no specific requirements under 40 CFR 60 subpart OOO and their installation will not result in an overall emissions increase. The plant also proposed to recycle waste tailings back to the final product through EU 024 and will install a larger rotary valve at the bin discharge.

The permittee requested that the Visible Emissions (VE) testing frequency be reduced from annually to prior to permit renewal. Emissions Units that are not subject to 40 CFR 60 subpart OOO and have consistently demonstrated low opacity readings will be modified to a VE test frequency from annually to prior to permit renewal. Emissions are controlled by dust collectors. Emission limits remain unchanged from the permitted PM limit of 0.017 gpdscf (applicant's request, used as supporting information in original construction permit applications).

CONCLUSION

This project revises Title V air operation permit No. 0390005-014-AV, which was issued on January 26, 2010. 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.