Department of Environmental Protection

FILE COPY

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

November 26, 1996

James O. Williams
Operations Manager
Premier Services Corporation
State Road 382 North
Port St. Joe, Florida 32465

File Number: 0450001-001-AC
Source I.D.: 0450001009

Dear Mr. Williams:

This letter concerns the above construction permit for your facility in Port St. Joe, Florida.

We agree to issuing an amended permit due to the request by Thomas Turpin of your firm. We sent you an intent to issue with a draft permit on October 17 1996, you received it on October 18, 1996. Mr. Turpin mailed his request for changes on the draft permit November 4, 1996 and we received it on November 8, 1996. However, we had already issued the final permit on November 7, 1996. Because the request and final permit crossed in the mail, there is no further action needed on your part.

- We accept the preventative maintenance plan presented in Attachment G of the application as modified by specific condition #8 in the amended permit as reasonable under the circumstances noted.

- The maximum allowable Particulate Matter (PM) emissions which was given in the application as 0.02 lb PM/hr, 0.1 T PM/yr is changed to 0.82 T PM/yr as per your calculations by the method provided by the baghouse manufacturer. The increased emissions are well within state regulations.

- Specific condition #16 serves to provide documentation and certification that the equipment is properly installed as per the permit application. The letter and/or application required will serve in your case to amend the existing operating permit and make the appropriate changes to the Title V permit application.

We are enclosing the amended permit with this letter. Include this letter and the amended permit in your files for future reference.

If you have any questions, contact Armando Sarasua of this office at (904) 444-8364. When referring to this project, please use the file number and source I.D. number indicated.

Sincerely,

Ed K. Middleswart

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

EKM:asc

Enclosure

Department of Environmental Protection

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Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794
November 26,1996

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Secretary

PERMITTEE:	AIRS I.D. Number: 0450001 Air Permit Number: 0450001-001-AC Emission Units: 009
Premier Services Corporation	Date of Issue: November 7, 1996 Amended: NOV 26 1996 Expiration Date: November 7, 2001 County: Gulf Project: Finished Product Bins 1 & 2 Dust Collector

This permit is issued under the provisions of Section 403.087, Florida Statutes, and Florida Administrative Code Rules 62-296, 62-297 and 62-4. The above named applicant, hereinafter called 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 Department and made a part hereof and specifically described as follows:

Construction of a Finished Product Bins 1 & 2 Dust Collector. The dust collector is a model 84BR025 bag filter manufactured by C P Environmental Filter, Inc., and has a 99% collection efficiency. The baghouse dust collector controls dust from filling operation of storage bins 1 & 2 with magnesium oxide and magnesium hydroxide. The finished product is transferred into bins 1 & 2 by a screw conveyor feeding a bucket elevator at a rate of 13 tons/hr of finished product. A flop gate at the top of the bins directs the air displaced during bin filling from the bin to the dust collector.

This permit supercedes the permit issued November 7, 1996.

Construction shall be consistent with the construction permit application signed July 31, 1996, and additional information submitted by letters dated September 25, 1996 and November 4, 1996.

Located: State Road 382 North, one mile out of Port St. Joe, North of US 98

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

PERMITTEE:

Premier Services Corporation

AIRS I.D. Number: 0450001
Air Permit Number: 0450001-001-AC
Emission Units: 009
Date of Issue: November 7, 1996
Amended: November 26, 1996
Expiration Date: November 7, 2001

SPECIFIC CONDITIONS:

General

1. The attached General Conditions are part of this permit. [FAC Rule 62-4.160]

Construction

2. The Department shall be notified upon commencement of construction, and within 15 days of completion of construction. Annual status reports shall be provided no later than January 31 of each year reviewing the status of construction during the preceeding year up to completion of the project. [FAC Rule 62-4.070]

3. The Department shall be notified and prior approval shall be obtained of any changes or revisions made during construction. [FAC Rule 62-4.030]

4. Satisfactory ladders, platforms and other safety devices as well as necessary parts shall be provided/made available to facilitate an adequate inspection program.
[FAC Rule 62-297.310(6)]

Operation

5. The maximum allowable operating rate is a total of 13 tons of finished product loaded into one or both of the bins per hour. This is the operating rate at which compliance with standards shall be demonstrated. The maximum allowable throughput is 113,880 tons of finished product per year. [FAC Rule 62-4.070 and construction permit application, letter of September 25, 1996]

6. The Finished Product Bins 1 & 2 Dust Collector may operate continuously, i.e., 8760 hrs/yr, based on 24 hours/day, 7 days/week and 52 weeks per year. [FAC Rule 62-4.070 and construction permit application]

7. The Permittee shall maintain a baghouse pressure drop range of between 3 in. water and 5 in. water. This shall be a surrogate compliance parameter for particulate matter. [FAC Rule 62-4.070, construction permit application and letter of September 25, 1996]

SPECIFIC CONDITIONS:

8. The Permittee shall implement the plan presented in Attachment G of the construction permit application to daily monitor dust collector operating parameters in order to insure that emissions are within the appropriate limits.

- Daily activities shall include measurement of the air pressure drop across the baghouse using a suitable differential pressure gauge, and a qualitative observation of opacity from the dust collector vent (i.e., identifying the presence or absence of a visible plume). If the pressure drop is out of specifications or visible emissions are observed , the cause of the malfunction shall be corrected.
- Permittee shall set up a system of logging and record keeping and shall record the findings of all daily and other inspections including pressure drop readings, occurrence/absence of visible emissions, date, number, and type of filters replaced, and other general comments on the performance of the dust collector.

Permittee shall keep records on site and make them available for department inspection for a period of five years from date of record. [FAC Rule 62-4.070 and construction permit application]

Emissions

9. Visible emissions from the dust collector vent shall not be greater than 5% opacity. This includes a waiver of particulate testing for small sources equipped with baghouses by submitting a visible emissions test which meets the 5% limit. [FAC Rule 62-296.712(3)(c)]

10. Visible emissions from other equipment such as conveyors and other materials handling equipment shall not be equal to, or greater than, 20% opacity. [FAC Rule 62-296.320(4)(b)]

11. The annual maximum allowable particulate emissions are 0.82 T/yr. [Construction permit application and letter of November 4, 1996]

12. All fugitive dust shall be adequately controlled by existing good housekeeping practices such as:

- application of water chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities
- use of hoods, fans, or filters to contain or capture particulate matter
- use of enclosures or coverings on conveying systems
- periodic sweeping and/or vacuuming of roads, parking lots and work areas, and closing doors on windy days. [FAC Rule 62-296.320(4)(c)]

SPECIFIC CONDITIONS:

13. This source shall be operated in such a fashion so as to preclude objectionable odors. Objectionable odor is any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance pursuant to FAC Rule 62-210.200(198).
[FAC Rule 62-296.320(2)]

Testing

14. 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. [FAC Rule 62-297.310(2)] Tests shall be conducted in accordance with the table below. Such tests shall be scheduled within 30 days after construction is completed. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.

Pollutant	Test Method
VE	DEP method 9, one-half hour
PM	EPA method 5 (if VE test does not meet Specific Condition 9)

The VE test shall be for a duration of one-half hour and shall be conducted during one of the PM test runs if the first VE test does not meet Specific Condition 9.

Test reports shall comply with F.A.C. Rule 62-297.310(8), Test Reports. Additionally, the compliance test report shall provide the following information on the air pollution control devices:

a. General condition of equipment, noting any deficiencies of problems with the equipment which occur during testing.

b. Normal operating parameters of the equipment and the actual operation parameters for each test run, including:

1. Pressure drop across the baghouse
2. Baghouse inlet temperature

The Department can require special compliance tests in accordance with F.A.C. Rule 62-297.310(7)(b). Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.

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. [FAC Rule 62-297.310(2)]

SPECIFIC CONDITIONS:

Administrative

15. An annual operating report for air pollutant emitting facility, DEP Form 62-210.990(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department of Environmental Protection, Northwest District Air Resources Management Program, (904) 444-8364. [FAC Rule 62-210.370(3)]

16. The applicant shall retain a Professional Engineer, registered in the State of Florida, for the inspection of this project. [FAC Rule 62-4.050)] Upon completion the engineer shall inspect for conformity to the permit application and associated documents. A letter, signed and sealed by the Professional Engineer in charge, or an application for an operation permit [Form DEP 62-210.900(1), Long Form or 62-210.900(2), Short Form, as applicable]shall be submitted with the compliance test results and appropriate fee, when applicable, to document proper completion of construction and noting any deviation from the conditions in the construction permit and test results where appropriate. [FAC Rule 62-4.220)] These are to be submitted within 75 days of completion of construction. The permittee shall obtain an operating permit or include this source as part of a Title V operating permit application for this source before the expiration of this construction permit if the permittee desires to continue operation. [FAC Rule 62-210.300]

17. In accordance with F.A.C. Rule 62-213, a Major Air Pollution Source Annual Operation Fee Form [DEP Form 62-213.900(1) enclosed] must be completed and submitted with appropriate fee between January 15 and March 1 of each year. If the Department has not received the fee payment by March 1, the Department shall impose, in addition to the fee, a penalty of 50 percent of the amount of the fee, plus interest on such amount computed in accordance with s.220.807, Florida Statutes. The Department may revoke any major air pollution source operation permit if it finds that the permit holder has failed to pay timely and required annual operation license fee, penalty or interest. The completed form and appropriate fees must be submitted to the Department of Environmental Protection, Title V Annual Emissions Fee, Cashiers Office, P.O. Box 3070, Tallahassee, Florida 32351-3070.

18. The emission unit covered by this permit is 0450001009. Please cite this number on all test reports and other correspondence specific to this permitted emission unit. [FAC Rule 62-297.310(8)]

19. The Permittee, for good cause, may request that this construction permit be extended. Such a request with the required $50 extension fee shall be submitted 60 days prior to the expiration date of this permit. [FAC Rule 62-4.080(3)]

PERMITTEE:

Premier Services Corporation

AIRS I.D. Number: 0450001
Air Permit Number: 0450001-001-AC
Emission Units: 009
Date of Issue: November 7, 1996
Amended: November 26, 1996
Expiration Date: November 7, 2001

SPECIFIC CONDITIONS:

20. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (904) 444-8364, day or night, and for emergencies involving a significant threat to human health or the environment is (904) 413-9911. For routine business, telephone (904) 872-4375 during normal working hours. [FAC Rule 62-4.130]

Expiration Date:

November 7, 2001

Issued this 26th day of NOV., 1996.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Ed K. Middleswart

ED K. MIDDLESWART, P.E.
Air Program Administrator