TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

CEMEX Construction Materials Florida, LLC
10311 Cement Plant Road
Brooksville, Florida 34601

Brooksville South Cement Plant

Facility ID No. 0530021

PROJECT

Project No. 0530021-049-AC
Application for Minor Air Construction Permit
Project Name: Replace EU Nos. 014 and 021 Dust Collectors

COUNTY

Hernando County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-0926

February 6, 2014

Prepared by Danny Stubbs

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Facility Description:

The facility consists of two Portland cement manufacturing lines; associated raw and product material handling activities; coal handling activities and auxiliary equipment; as well as, all of the land designated as the South Brooksville facility.

II. Project Description:

A. Applicant:

Mr. Jim Daniel, Plant Manager
CEMEX Construction Materials Florida, LLC
10311 Cement Plant Road
Brooksville, Florida 34601

B. Professional Engineer:

Mr. Maxwell Lee, Ph.D., P.E.,
Koogler and Associates, Inc.
4014 MW 13th Street
Gainesville, Florida 32609

C. Project Location:

The facility is located in Hernando County at 10311 Cement Plant Road in Brooksville, Florida.

D. Project Summary:

This project authorizes the replacement of the existing dust collectors on EU Nos. 014 and 021 with new DCL loadout spout dust collectors (Model No. CFM470). The replacements dust collectors are considered like-kind replacements and the particulate matter allowable emissions for these emissions units will not be increased due to the project.

Note: Title V Permit No. 0530021-047-AV incorrectly specifies an air flow rate of 10,000 acfm for EU No. 021. This permit reflects the correct air flow rate of 3,200 acfm for EU No. 021 in Specific Condition No. A.1. The allowable PM emissions limit for EU No. 021 was also corrected based on the corrected flow rate. The PM emissions limit of 0.015 gr/acf does not change; however, the pounds per hour rate was changed from 1.29 to 0.4 lbs/hr and the tons per year (tpy) rate was changed from 5.65 to 1.75 tpy.

E. Application Information:

Application Received on: 1/14/2014
Application Complete on: 1/14/2014

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is a PSD major source but this project does not trigger PSD review
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	facility is a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	facility is not a source of unconfined particulate matter emissions
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	facility is not located in a VOC RACT area
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	facility is not located in a PM RACT area
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	EU Nos. 014 and 021 are subject to 40 CFR 60, Subpart F *(Note: 40 CFR 60, Subpart F and 40 CFR 63, Subpart LLL have similar requirements)*
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category

Subject to:	Y/N	Comments
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS – 40 CFR 63)	Y	EU No. 014 and 021 are subject to 40 CFR 63, Subpart LLL *(Note: 40 CFR 60, Subpart F and 40 CFR 63, Subpart LLL have similar requirements)*
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	Y	facility is a Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required for EU No. 014 & 021.

IV. Summary of Emissions

EU No. 014 - A-Side Cement Storage Silos #1 & #2 Discharge System with Baghouse
EU No. 021 - B-Side Cement Storage Silos #1, #2 & #3 Discharge System with Baghouse

Pollutant	EU No.	Potential Emissions	Allowable Emissions
PM/PM10	014	1.75 TPY *(0.015 gr/acf; 0.4 lb/hr)*	1.75 TPY *(0.015 gr/acf; 0.4 lb/hr)*
	021	1.75 TPY *(0.015 gr/acf; 0.4 lbs/hr)*	1.75 TPY *(0.015 gr/acf; 0.4 lbs/hr)*
	Total	**3.5 TPY**	
VE Limitation			
VE	014		10% Opacity
	021		10% Opacity

Notes:

(1) Allowable PM/PM10 emissions listed in the table were established in Construction Permit No. 0530021-043-AC (PSD-FL-091K) and BACT. PM/PM10 emissions represented in lb/hr and TPY are equivalent emissions based on the allowable emissions limit (0.015 gr.acf) and the actual airflow (3,200 acfm) of each emissions unit.

(2) Allowable PM/PM10 emissions for EU No. 021 differ from the values listed in Title V Permit No. 0530021-047-AV because the Title V permit incorrectly specifies an air flow rate of 10,000 acfm where tha actual flow is 3,200 acfm. As a result, the PM limit of 0.015 gr/acf does not change; however, the pounds per hour rate decreases from 1.29 to 0.4 lb/hr and the annual tons per year rate decreases from 5.65 to 1.75 tpy.

(3) The VE limitation of 10% opacity is specified in 40 CFR 63, Subpart LLL and in 40 CFR 60, Subpart F.

PSD Applicability:

Based on the information provided in the Summary of Emissions table above, this project is a minor modification and is not subject to requirements of subsection 62-212.400(4) through (12), F.A.C. The Significant Emissions Rate thresholds for the pollutant PM, PM_{10} and $PM_{2.5}$ are 25 tpy, 15 tpy and 10 tpy respectively. The PM/ PM_{10}/ $PM_{2.5}$ allowable emissions for this project are all limited to 3.5 tpy and this is below the Significant Emissions Rate thresholds for all particulate matter. Also, the monitoring,

reporting and recordkeeping provisions of 62-212.300(e) are not required in the construction permit because PSD avoidance is not based on projected actual emissions.

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).