FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest District Office
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

DRAFT PERMIT

PERMITTEE

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

Authorized Representative:
Mr. Jim Daniel, Plant Manager

Air Permit No. 0530021-049-AC
Permit Expires: 09/30/2016
CEMEX Brooksville South Cement Plant
Minor Air Construction Permit
Replace EU Nos. 014 and 021 Dust Collectors

This is the final air construction permit for replacement of the dust collectors on Emissions Unit Nos. 014 and 021. The proposed work will be conducted at the existing Brooksville South Cement Plant, (Standard Industrial Classification No. 3241). The facility is located in Hernando County at 10311 Cement Plant Road in Brooksville, Florida. The UTM coordinates are Zone 17, 360.0 km East, and 3162.5 km North. As noted in the Final Determination provided with this final permit, no changes or only minor changes and clarifications were made to the draft permit.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Due to the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Hillsborough County, Florida
DRAFT

_____ _____

Kelley M. Boatwright
District Air Program Administrator
Southwest District

Effective Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination, the Final Permit and the Appendices) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on the date indicated below to the persons listed below.

Mr. James S. Daniel, Cement Plant Manager, CEMEX (jdaniel@cemexusa.com)

Mr. George Townsend, CEMEX (gtownsend@cemexusa.com)

Mr. Max Lee, Ph.D., P.E., Koogler and Associates, Inc. (mlee@kooglerassociates.com)

Ms. Susan Pelz, Florida DEP (susan.pelz@dep.state.fl.us)

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

DRAFT

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The existing 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 and includes the following emissions units (EUs).

Facility ID No. 0530021

Brooksville South Portland Cement Line 1 - *Regulated Emissions Units*		
EU ID No.	**Facility's Internal ID No.**	**Brief Description**
001	D-75	Filter Dust Bin (was Pre-Mix Bin) with Baghouse
002	D-67	Fly Ash/Equilibrium Catalyst Storage Silo with Baghouse
004	F-14	Raw Meal Transfer with Baghouse
006	G-12 (A & B)	Two Blend Silos with Baghouse
007	H-15	Kiln Feed Surge Bin with Baghouse
008	S-04	Clinker Receiving/Handling System
009	K-07 & L-03	Clinker Cooler Discharge with Baghouse
010	L-05, L-06 & L-07	Clinker Storage Silos with Baghouse
011	L-08	Gypsum and Limestone Bins (was Clinker Silo) with Baghouse
012	M-08 M-04	EP-01 Silo Discharge with Baghouse (M-08) and EP-02 Clinker Feeder Baghouse (M-04).
013	N-13	Finish Mill with Baghouse
014	Q-17	A-Side Cement Storage Silos #1 & #2 Discharge System with Baghouse
015	Q-15	Cement Storage Silos #1 & #2 with Baghouse
019	M-05	Finish Mill Feed Belt with Baghouse
020		Cement Kiln 1, In-Line Kiln/Raw Mill and Clinker Cooler 1 with Baghouse
021	Q-18	B-Side Cement Storage Silos #1, #2 & #3 Discharge System with Baghouse
022	Z-15	Cement Storage Silo #3 with Baghouse
023		Cement Storage Silo #4 and Truck Loadout System with Baghouse
024	Z-18	Cement Storage Silo and Railcar Loadout System with Baghouses
063	M03	Kiln No. 1 Clinker Belt Dust Control

Brooksville South Portland Cement Plant 2 - *Regulated Emissions Units*		
EU ID No.	**Baghouse ID No.**	**Brief Description**
Pyroprocessing System		
044	331.BF300	Kiln, In-line Raw Mill, Pre-Heater, Pre-Calciner and Clinker Cooler No. 2

Raw Mill and Raw Meal Handling and Storage System		
045	331.BF640	Filter Dust Bin
	311.LS609	Filter Dust Bin Loadout Spout
046	341.BF400	Blend Silo
047	351.BF420	Kiln Feed Transport
	341.BF410	Blend Silo Discharge
	351.BF410	Kiln Feed Bin
Clinker Handling and Storage		
048	471.BF110	Clinker Transport
050	471.BF120	Clinker Storage Silo,
	481.BF155	Clinker Silo Discharge 1
	481.BF165	Clinker Silo Discharge 2
Finish Mill System		
051	511.BF650	Finish Mill Additives
052	531.BF500	Finish Mill and Air Heater
054	531.BF020	Finish Mill Bucket Elevator
057	531.BF400	Finish Mill Cement Transport Finish Mill Rejects Transport
Cement Silos and Loadout		
058	612.BF005	Cement Silo 5
	612.BF620	Cement Silo 5 Loading Bin
	622.LS140	Cement Silo 5 Loadout Spout N
	622.LS160	Cement Silo 5 Loadout Spout S
059	611.BF005	Multi Cell Cement Silo
	611.BF045	Multi Cell Cement Silo Alleviator
	611.BF610	Multi Cell Loadout Transport
	611.LS760	Multi Cell Loadout Spout
Other		
Not Numbered		Alternative Fuel Handling and Processing
060	461.BF400	Coal Mill
061	461.BF560	Fine Coal Bin
062	641.BF150	Packing Plant
063	N/A	Emergency Diesel Generator

Brooksville South Portland Cement Line 1 and Portland Cement Line 2		
042	N/A	Coal Receiving, Handling and Transfer System (fugitives)
Not Numbered		Facility wide Fugitive Emissions

Project Description and Affected Emission Units

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.

This project will modify the following emissions units (EUs).

EU ID No.	Facility's Internal ID No.	Emissions Unit Description
014	Q-17	A-Side Cement Storage Silos #1 & #2 Discharge System with Baghouse
021	Q-18	B-Side Cement Storage Silos #1, #2 & #3 Discharge System with Baghouse

NOTE: *Please reference the Permit No., Facility ID, and Emission Unit ID in all correspondence, test report submittals, applications, etc.*

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAPs).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

PERMIT HISTORY/AFFECTED PERMITS

Reference Title V Permit No. 0530021-047-AV.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority - The permitting authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Air Permitting Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Air Permitting Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to applications for permits shall be submitted to the above address.

2. Compliance Authority - The compliance authority for this project is the Florida Department of Environmental Protection (Department), Southwest District Office's Compliance Assurance Program. The mailing address and phone number is:

Florida Department of Environmental Protection
Southwest District Office
Compliance Assurance Program
13051 North Telecom Parkway
Temple Terrace, Florida 33637-0926
Telephone: 813-470-5700

All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the above address.

3. Appendices - The following Appendices are attached as part of this permit:

a. Appendix A. Citation Formats and Glossary of Common Terms;

b. Appendix B. General Conditions;

c. Appendix C. Common Conditions; and

d. Appendix D. Common Testing Requirements.

4. Applicable Regulations, Forms and Application Procedures - Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions - For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.
[Rule 62-4.080, F.A.C.]

6. Modifications - Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the

actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
[Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report - On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Application for Title V Air Operation Permit - This permit authorizes modification of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for continued operation of the permitted emissions units. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation or commencing operation as modified. Commencing operation means setting into operation of any emissions unit for any purpose. To apply for a Title V air operation permit, the applicant shall submit the following:

a. the appropriate permit application form *(see current version of Rule 62-210.900, F.A.C. (Forms and Instructions), and/or FDEP Division of Air Resource Management website at: http://www.dep.state.fl.us/air/)*; and

b. a copy of the initial compliance test report(s) required by Specific Condition No. A.14., if not previously submitted.

The application shall be submitted to the Permitting Authority.
[Rules 62-4.030, 62-4.050, 62-4.220 and Chapter 62-213, F.A.C.]

A. EU No. 014 & 021 - Cement Line 1 Materials Handling Activities

This section of the permit addresses the following emissions units (EUs).

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

PERFORMANCE RESTRICTIONS

A.1. Federal Regulatory Requirements - These emissions units are subject to 40 CFR 63, Subpart LLL – National Emissions Standards for Hazardous Air Pollutants from Portland Cement Manufacturing Industry and 40 CFR 63, Subpart A - General Provisions; and to 40 CFR 60, Subpart F - Standards of Performance for Portland Cement Plants and 40 CFR 60, Subpart A - General Provisions. These subparts are adopted by reference in Rule 62-204.800, F.A.C.
[Rule 62-204.800(11), F.A.C.]

A.2. Permitted Capacity

EU ID No.	Description	Stack [1]	BH [2]	Temp [3]	Flow [4]	Throughput
014	A-Side Cement Storage Silos #1 & #2 - unloading of cement from the three storage silos	50/1.5	Low	160	3,200 2,121	300 TPH
021	B-Side Cement Storage Silos #1, #2 & #3 Discharge System - used for the unloading of cement from a storage silo	50/1.5	Low	160	3,200 2,121	300 TPH

1. Height (ft)/diameter(ft)
2. Baghouse temperature range.
3. Nominal temperature degrees Fahrenheit (ºF)
4. Nominal flow in actual cubic feet per minute (acfm) and standard cubic feet per minute (scfm).

(Permitting Note - See Appendix D, Condition 1, for operation rate during testing requirements.)

[Rule 62-210.200 (definition of Potential to Emit), F.A.C.]

A.4. Restricted Operation - The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200 (definition of Potential to Emit), F.A.C.; Construction Permit No. 0530021-043-AC (PSD-FL-091K)]

EMISSIONS STANDARDS

A.5. Particulate Matter Emissions

EU ID No.	Brief Description	Emission Limits	Basis
014	A-Side Cement Storage Silos #1 & #2 Discharge System	0.015 gr/acf; 0.4 lb/hr; 1.75 TPY	BACT
021	B-Side Cement Storage Silos #1, #2 & #3 Discharge System	0.015 gr/acf; 0.4 lbs/hr; 1.75 TPY	BACT

[Construction Permit No. 0530021-043-AC (PSD-FL-091K) and BACT]

A.6. Visible Emissions Standard – For each emissions unit, visible emissions shall not exceed 5 percent opacity. For each emissions unit, as long as the VE does not exceed 5 percent opacity, compliance is assumed for the PM emissions limits given in **Specific Condition A.5** of this subsection**.** If the Department has reason to believe that the PM mass emissions standard is not being met, it shall require that compliance be demonstrated by the stack testing utilizing EPA Method 5 pursuant to 40 CFR 60, Appendix A, and Chapter 62-297, F.A.C**.** By meeting the 5 percent opacity requirement, these emissions units will also meet the 10 percent opacity requirement of NESHAP 40 CFR 63, Subpart LLL.
[Construction Permit No. 0530021-043-AC (PSD-FL-091K) and BACT]

COMPLIANCE TESTING REQUIREMENTS

A.7. Initial Compliance Tests - These emissions units (EU Nos. 014 & 021) shall be tested to demonstrate initial compliance with the visible emissions standard (Specific Condition A.6). The initial tests shall be conducted no later than 90 days after initial operation of the unit.
[Rules 62-4.070(3) and 62-297.310(7)(a)1., F.A.C.]

A.8. Compliance Tests After Initial Testing - During each federal fiscal year (October 1st to September 30th), the emissions unit shall be tested to demonstrate compliance with the visible emissions standard.
[Rule 62-297.310, F.A.C.]

A.9. Compliance Test Requirements - Compliance tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310, F.A.C.]

A.10. Compliance Test Methods - Required compliance tests shall be performed in accordance with the following reference methods.

Methods	Description of Method and Comments
1-4	Traverse Points, Velocity and Flow Rate, Gas Analysis, and Moisture Content
5	Determination of Particulate Matter Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary Sources

Methods	Description of Method and Comments
22	Visible Determination of Fugitive Emissions

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department.
[Rule 62-204.800, F.A.C.; Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

A.11. Opacity Monitoring - The owner or operator of an affected source subject to a limitation on opacity under 40 CFR 63.1345 must conduct required opacity monitoring in accordance with the provisions of paragraph 40 CFR 63.1350 f)(1)(i) through (vii) and in accordance with your monitoring plan developed under § 63.1350(p).
[Rule 62-204.800, F.A.C.; and, 40 CFR 63.1350(f) (Subpart LLL version dated 2/12/2013)]

NOTIFICATION REQUIREMENTS

A.12. Test Notification - The permittee shall notify the Compliance Authority in writing at least 30 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

(*Permitting Note - The notification should also include the relevant emission unit ID No(s)., test method(s) to be used, and pollutants to be tested.*)

[Rules 62-4.070(3) and 62-297.310(7)(a)9., F.A.C.]

A.13. Notification of Operation Commencement - The permittee shall notify the Compliance Authority in writing of the date of commencing operation of the EU No. 014 and of EU No. 021 after completing the modifications authorized by this permit, no later than fifteen (15) days after that date. Commencing operation means setting into operation of any emissions unit for any purpose.
[Rules 62-4.070, and 62-210.200, F.A.C., (definition of Commence Operation)]

RECORDKEEPING AND REPORTING REQUIREMENTS

A.14. Compliance Test Reports - The permittee shall prepare and submit reports for all required compliance tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit.
[Rule 62-297.310(8), F.A.C.]

{Permitting Note: Except for the changes specified in the conditions above, these emissions units remain subject to the all other valid conditions contained in the current Title V permit.}