Florida Rock Industries, Inc.
Tampa Plant
Facility ID No.: 0570018
Hillsborough County

Title V Air Operation Permit Renewal

FINAL Permit Project No.: 0570018-018-AV

Permitting and Compliance Authority:
Environmental Protection Commission
of Hillsborough County
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[electronic file name: 0570018.018.PER.F.doc]

Title V Air Operation Permit Renewal

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Permittee:
Florida Rock Industries, Inc.
Tampa Plant
2001 Maritime Boulevard
Tampa, FL 33605

FINAL Permit No.: 0570018-018-AV
Facility ID No.: 0570018
SIC No(s).: 3241, 3275
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit and to incorporate Permit Nos. 0570018-012-AC, 0570018-013-AC and 0570018-014-AC. This permit also incorporates Permit No. 0570018-017-AC, which was issued concurrently with this renewal permit. A Compliance Plan has been included with the Title V Renewal Permit to address required compliance testing not completed prior to the issue date of this permit. This existing facility is located at 2001 Maritime Boulevard, Tampa, Hillsborough County; UTM Coordinates: Zone 17, 357.9 km East and 3090.7 km North; and, Latitude: 27° 57' 00" North and Longitude: 82° 26' 36" West.

This Title V Air Operation Permit Renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to 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 I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/06
Appendix SS-1, STACK SAMPLING FACILITIES version dated 10/07/96
Appendix O&M/CAM Plan
Appendix Fugitive Dust Control Plan

Effective Date: September 26, 2011
Renewal Application Due Date: February 14, 2016
Expiration Date: September 26, 2016

Environmental Protection Commission
of Hillsborough County

_____
Richard D. Garrity, Ph.D.
Executive Director

Section I. Facility Information.

Subsection A. Facility Description.

This facility is primarily a cement handling and packaging operation that receives various cementitious products from ships or trucks for processing and shipment off-site. The facility handles two distinct types of products: 1) Bulk Fine Materials; and 2) Bulk Coarse/Granular Materials. Fine materials (e.g. cement, flyash, milled limestone, etc.) are handled pneumatically, stored in enclosed silos, and controlled by baghouses, with the exception of transfer of material on enclosed Belt Conveyor #7 during the ship unloading transfer to Silos 27 and 28. Coarse/Granular materials (e.g. gypsum (natural and synthetic), slag (blast furnace, white, black, other), limestone, sand, pumice, emathlite, kitty litter, bauxite, etc.) are typically handled with conveyors and elevators, stored in open stockpiles, and controlled though moisture content, enclosures on conveyor belts, and water sprays or dust suppressants, as necessary. The operations at the facility have been grouped into sections based on the physical location of the various distinct operations around the site. Where possible, the units are described based on the process flow of the materials as follows: 1) Receiving; 2) Transfer; 3) Processing; 4) Storage; and 5) Shipping. Some emission units are mentioned in multiple groups because their operations carryover to several processes.

<u>Bulk Coarse/Granular Material Handling/Processing – (Emission Unit (EU) 053, 054, 058, 059, 074, 075, 076, 077, 078, 083)</u>

Bulk coarse/granular materials are received from ships or trucks. Coarse/Granular materials are unloaded from ships (EU 053) using self unloading equipment or clamshells. The material is currently loaded into two hoppers (EU 054) that empty onto dedicated covered conveyor belts that direct the product onto a single covered conveyor (Conveyor #6) or directly to a loadout chute. A third hopper is also scheduled to be constructed, which will operate similar to the existing two. A loadout chute is also located on the southern end of Conveyor #6. Material can be delivered through the loadout chutes directly to trucks or a mobile stacker conveyor hopper, followed by a series of up to three moveable stick conveyors if necessary, so a stockpile can be formed near the ship unloading area. The trucks can deliver the products to the desired stockpile on-site or take the material off-site. Alternatively, the material on Conveyor #6 is transferred to an enclosed conveyor (Conveyor #7), which ascends to an enclosed tower where the material is transferred to a covered conveyor (Conveyor #8) through a diverter. A baghouse controls emissions at this transfer point; however, it is typically only utilized during bulk fine unloading. Conveyor #8 empties onto a series of up to three moveable stick conveyors, which empty onto an automatic radial stacker for formation of the storage piles on the north side of the site. The fixed portion of the radial stacker is covered. All of the transfer of material from the dockside hoppers via conveyors or truck to the stacker conveyors is identified as EU 059 and estimated potential emissions were based on 8

transfer points.

Trucks arriving with coarse/granular materials from off-site can drop the products directly to storage piles located around the yard or into hoppers or grates feeding the various processes. The drop of material to a pile from conveyor or truck is identified as EU 077. The material received from the ships and trucks is typically moist and water sprays are required as needed to reduce PM emissions. Bulk coarse/granular materials can also be loaded out to trucks from stockpiles for movement around the yard or delivery off-site. Front-end loaders retrieving material from the piles can load directly to trucks or to a hopper feeding a movable conveyor which drops the material into trucks. Emissions from this loadout are identified as EU 083.

The bulk coarse/granular materials can be processed through a natural gas-fired parallel-flow rotary drum dryer at a maximum rate of 150 ton/hr to reduce the moisture content prior to further processing and/or blending. Material sent to the dryer is retrieved from the storage piles and dropped into the dryer feed hopper via front-end loader, and then transferred via open conveyors into the dryer. The handling of material prior to the dryer is identified as EU 074. Material exiting the dryer is passed though an enclosed drag conveyor and then up an elevator where it feeds either the bulk coarse/granular silo (EU 075) or Finish Mill Feed Silos 9C, 10A and 10B. Emissions from the dryer and drag conveyor are controlled by Baghouse 58 (EU 058). Collected dust from this baghouse is returned to the enclosed drag conveyor. Material from the bulk coarse/granular silo is bulk loaded into trucks (EU 076). The bulk coarse/granular silo is primarily used to store dried sand and its emissions are controlled through partial enclosures.

Bulk coarse/granular materials can also be processed through a crusher/screener to recover the desired sizes for further processing. Bulk coarse/granular materials can be reclaimed from the storage piles via front-end loader and placed into a hopper. From the hopper, the material is fed via conveyor into a crusher. From the crusher, the material is transferred via conveyor and dropped into a triple-deck screen to separate the product by size at an estimated maximum process rate of 50 ton/hr. Three conveyors will radiate out from the various levels of the screen to convey the product to form three distinct piles based on the screen size. Water sprays are required throughout this operation to ensure that that product retains sufficient moisture to minimize particulate matter emissions. This operation is identified as EU 078.

<u>Bulk Fine Material Receiving and Silos 27 & 28 – (EU 027, 042, 043, 044, 045, 053, 060, 061, 066)</u>

Bulk fine materials are received from ships or trucks. This facility receives bulk fine materials from two types of ships - bulk carrier vessels with open holds and self unloading vessels with onboard pumps and closed holds (EU 053). The bulk fine materials are removed from ships by vacuum via two cyclone separators with dedicated unloading arms. Emissions from each unloading

arm/separator are controlled with dedicated baghouses, designated as Baghouse 44 and Baghouse 45 (EU 044 and EU 045). The material travels down independent air slides from each separator and is delivered onto Conveyor #7 in an enclosed area controlled by Baghouse 27 (EU 027). The material ascends to an enclosed tower where the bulk fine material is transferred via diverter to an air slide. Baghouse 66 (EU 066) controls this transfer and is located on top of the transfer house. The air slide discharges into a screen that feeds a bucket elevator that empties onto another air slide leading to Silos 27 and 28. There are also four truck unloading lines at ground level of Silos 27 and 28 that allow trucks to pump material directly into the base of the bucket elevator that leads to the silos. Emissions generated during the transfer of the product from Conveyor #7 air slide to the screen, the truck unloading lines to the base of the elevator, the bucket elevator, and the transfer of material from the elevator to the next air slide are controlled by Baghouse 42 (EU 042). The elevator has a maximum process rate of 1,000 ton/hr.

The air slide from the bucket elevator delivers the product to a diverter leading to two air slides. One air slide empties the material into Silo 27. The other air slide leads to a diverter that routes the material to either Silo 28 or to an air slide leading directly to the Finish Mill Feed Silos. Material in Silo 27 and Silo 28 can be loaded directly into trucks, or transferred to the finish mills. The product from the silos is transferred by dedicated air slides from each silo to the Silo Transfer Elevator which feeds the final air slide leading to the Finish Mill Feed Silos. In addition, there are four lines that run from the ground directly into the top of the two silos that allow up to four trucks to pneumatically unload simultaneously to either Silo 27 or 28, or a combination of the two. Emissions from the transfers through these various air slides, from the loading of Silos 27 and 28, and from the Silo Transfer Elevator are controlled by Baghouse 43 (EU 043).

Beneath Silos 27 and 28 are individual truck loadout stations which allow for bulk loadout of fine material to trucks from the silos through a telescopic chute. Also located beneath Silo 28 (north silo) is a jumbo bag filling station consisting of 4 jumbo bag filling spouts. Up to 4 jumbo bags can be filled simultaneously. Emissions from Silo 27 truck loading is controlled by Baghouse 60 (EU 060). Emissions from Silo 28 truck loading and the jumbo bag filling station is controlled by Baghouse 61 (EU 061). Both baghouses are located within the base of the corresponding silo.

<u>Finish Mills – (EU 012, 013, 016, 017, 018, 019, 020, 021, 080, 081)</u>

In the finish mill building, bulk coarse/granular and fine materials are initially stored, processed through the grinding mills and/or separators to be sized as needed, and then pumped to storage silos for eventual blending and/or loadout. The Finish Mill Feed Silos are comprised of 12 silos that can be loaded from the air slide connected to Silos 27 and 28, directly from trucks (selective silos), from a bucket elevator (Silos 9C, 10A, and 10B), or from the exit of the finish mills (reclaimed). Several of the Finish Mill Feed Silos can receive fine materials directly from trucks.

Silos 7A, 7B, 8A, 8C, and KL have single truck unloading line, and Silos 9A and 9B have two truck unloading lines. Emissions from Silos 7A, 7B, 7C, 8A, 8B, 8C, 9A, 9B, and KL are all controlled by Baghouse 12 (EU 012). A bucket elevator is located on the east side of the silos that is fed directly from the dryer or from a short conveyor beneath a truck unloading grate. The elevator can feed finish mill Silos 9C, 10A and 10B. Emissions from Silos 10A and 10B are controlled by Baghouse 19 (EU 019). Silo 9C is not controlled by a baghouse, and its emissions are controlled through partial enclosures and material moisture content. Silo 9C is identified as EU 081.

Products from the Finish Mill Feed Silos are transferred via drag conveyors to the No. 9 finish mill, the No. 10 finish mill, the No.8 mixing separator, or directly to an outgoing surge pump via the No. 7 transfer line. For Finish Mill #9, the #9 drag conveyor transfers materials from the feed silos to the Finish Mill #9 direct feed elevator. The elevator feeds a drag conveyor which unloads the material into Finish Mill #9. Material exiting the mill is transferred through the #9 main floor screw conveyor, then up the #9 main elevator, and then into the two #9 separators. Rejects from the separators are fed back into the finish mill. The desired products from the separators are fed into the #4 surge bin. From the #4 surge bin, material is fed to either Pump A or Pump C for pneumatic transport to the packhouse silos, the bulk silos, or back to the finish mill feed silos. Emissions from the drag conveyors, the direct feed elevator, the base of the main elevator, the surge bin, and the Pumps A and C are controlled by Baghouse 17 (EU 017). Emissions from Finish Mill #9 and the Finish Mill #9 to screw conveyor transfer are controlled with a cyclone in series with Baghouse 18 (EU 018). Collected material from the cyclone and Baghouse 18, along with reclaimed product from the vacuum truck cleaning system, is dropped into the floor screw conveyor. Emissions from the #9 main elevator and the two #9 separators are controlled by Baghouse 16 (EU 016). Collected material from Baghouse 16 is transferred via screw conveyor to the #4 surge bin.

For Finish Mill 10, the handling of material is very similar to Finish Mill 9. Material is received and processed through Finish Mill 10 and then directed to two separators using similar transfer equipment to Finish Mill 9. Desired products from the separators are fed into the #3 surge bin. From the #3 surge bin, material is fed to either Pump A, Pump B, or Pump C for transport. Emissions from the #10 drag conveyors, the #10 direct feed elevator, and the base of the #10 main elevator are controlled by Baghouse 20 (EU 020). Emissions from the finish mill and finish mill to screw conveyor transfer are controlled by Baghouse 21 (EU 021). Collected material from Baghouse 21 is dropped into the floor screw conveyor. Emissions from the #10 main elevator, the two #10 separators, and the #3 surge bin are controlled by Baghouse 19 (EU 019). Collected material from Baghouse 19 is transferred via air slide to the #3 surge bin. Pump B is controlled by a small standalone baghouse identified as Baghouse 80 (EU 080) exhausting inside the building.

For Line #8, the #8 drag conveyor transfers materials from the feed silos to the #8 main elevator.

The elevator delivers material to the #8 separator which serves as a mixer (no materials are separated or removed). The desired products from the separator are fed into the #2 surge bin via screw conveyor. Line #7 is similar to Line #8, but there is no separator. Line #7 is only used to transfer material from the feed silos to the #2 surge bin. However, the facility has the flexibility to divert product flow from Line #7 to Line #8 through use of an air slide from the #7 drag conveyor to the #8 main elevator. From the #2 surge bin, material is fed to either Pump B or Pump C for pneumatic transport. Emissions from the #7 and #8 drag conveyors, the main elevators, the #7 transfer air slide, and the screw conveyors from both lines, along with the #2 surge bin and #8 separator, are all controlled by Baghouse 13 (EU 013).

Bulk Silos – (EU 006, 007, 008)

The Bulk Silos are comprised of 8 silos (6 exterior silos and 2 interstitial silos). Material is loaded into the silos from the finish mills, or directly from ships or trucks (selective silos). Material from ships can be transferred directly to any of the Bulk Silos. A single truck unloading line can only feed Silos 19, 20, or 21 at one time. Beneath the three silos on the east side (Silos 19-21) is the east bulk truck loading spout. Trucks can be loaded by a telescopic spout that extends down to the truck opening. The emissions are vented to Silo 21. Beneath the three silos on the west side (Silos 22-24) is the west bulk truck loading station with a telescopic loading spout, similar to the east side. Beneath Silo 24 are four jumbo bag filling stations. These stations can fill up to 3-ton jumbo bags from Silo 24 for shipment off-site. An additional two jumbo bag filling stations are located beneath Silo 22. Emissions from the 4 jumbo bag filling stations (beneath Silo 24), the east truck loading spout, and Silos 19, 20, 21, and 24 are controlled by Baghouse 6 (EU 006). Emissions from the 2 jumbo bag filling stations (beneath Silo 22), the west truck loading spout, and Silos 22 and 23 are controlled by Baghouse 8 (EU 008). Emissions from the 2 interstitial silos, Silos 25 and 26, are controlled by Baghouse 7 (EU 007). Silo 19 can also be controlled by Baghouse 7 (EU 007) as an alternative operation if necessary in order to help prevent product contamination.

Packhouse Silos/Blending Plant/Packing Operations – (EU 001, 002, 003, 005, 031, 032, 071, 072, 073, 082)

Bulk fine materials are stored in the Packhouse Silos and transferred to either the blending plant or a series of packers for bagging of material for shipment off-site. The Packhouse Silos are comprised of 18 silos. Material is loaded into the silos from the finish mills, or directly from trucks or ships (selective silos). Material from ships can be transferred directly to any of the Packhouse Silos. The Packhouse Silos have four distinct truck unloading operations. Silos 11, 12, 17, and 18 can be loaded by a single truck line. Silos 1, 2, 3 can be loaded by a single truck line, and Silos 7 and 10 each have single individual truck unloading lines. Packhouse Silos 1, 2, and 3 are controlled by Baghouse 2 (EU 002). Packhouse Silos 4, 5, and 6 are controlled by Baghouse 1 (EU 001). Packhouse Silos 7-10 and 13-16 are controlled by Baghouse 3 (EU 003). Silo 17 can also be

controlled by Baghouse 3 as an alternative operation if necessary in order to help prevent product contamination. Packhouse Silos 11, 12, 17 and 18 are controlled by Baghouse 5 (EU 005). Silo 7 can also be controlled by Baghouse 31 as an alternative operation if necessary.

Packhouse Silos 2-6, 11, 12, and 14-18 can feed the rotary packing system on the north end of the building. Material from these silos are either fed directly to the primary bucket elevator or through a secondary elevator followed by a screen that feeds the primary elevator. From the primary elevator, the material drops through a screen and into the holding bin above the packer. The rotary packer was manufactured by Haver Filling Systems, Inc. and can load different sizes of bags up to approximately 100 pounds at various rates, with a maximum estimated loading rate of 141 ton/hr and 4000 bags/hr. Packaged materials are discharged onto belt conveyors that transport the bags to the storage warehouse. A quality control system on the finished bag conveyor examines each bag and shreds off-spec bags. There is also a reclaim hopper beneath the packer to collect spilled material. Reclaimed material from packing and damaged bags is collected through a series of screw conveyors and sent to the secondary elevator. The secondary elevator can discharge back to the primary elevator or to a series of isolation bins that temporarily store material to prevent product contamination. Emissions from all of the handling operations associated with the rotary packer are controlled by Baghouse 71 (EU 071).

Packhouse Silos 7-10 and 13-16 can feed the automated packers, the manual packer, and the Haver inline packer. Packhouse Silos 1-6 can feed the manual packer and the Haver inline packer, but not the automated packers in order to prevent product contamination. For the automated packers, material is transferred by air slides or screw conveyors to an elevator, and then through a rotary screen which discharges into one of three chutes. One chute leads directly to an automated packer bin, the second chute is into a screw conveyor to the second packer bin, and the third chute leads to the #6 screw conveyor which can feed any of the packer bins (manual, automated and Haver inline). The material from each bin is fed through a rotary air lock to the packers. Emissions from the air slides, elevator, screw conveyors, screen, storage bins, and packers are controlled by Baghouse 31 (EU 031). For the manual and Haver inline packers, material is fed directly to the packers from the packhouse silos via air slide to an elevator, screen, and then storage bin above the packers. The packers can also receive material processed through the blending plant.

Packaged materials from all 4 packers are discharged onto belt conveyors that transport the bags to the storage warehouse. Beneath the 4 packers is an open reclaim screw conveyor to collect loose material from the bagging operation. Emissions from the bag handling system and the material reclaim system are controlled by Baghouse 32 (EU 032).

The blending plant is located east of the 4 packers. All materials enter the blending plant from the packhouse silos via air slides, screw conveyors and an elevator that direct the material to the blending plant bucket elevator or directly to the bulk jumbo bag holding bin. Material can also be

pneumatically unloaded from trucks through 3 unloading lines directly to the 4 elevated storage bins or the jumbo bag filling holding bin. Coarse/Granular materials can also be bulk loaded into the blending plant elevator by truck through a small hopper connected with a short screw conveyor. The loadout from truck to the blending plant hopper is identified as EU 082. The material exiting the blending plant elevator goes through a diverter gate and can be directed to any of the 4 storage bins, to the manual and Haver inline packer hopper for bagging, or to the bulk jumbo bag holding bin. From the jumbo bag holding bin, the blended product is sent to the jumbo bag filling station consisting of 2 jumbo bag filling spouts for loadout to up to two 3-ton jumbo bags simultaneously at an approximate loadout rate of 60 ton/hr. Materials stored in the 4 storage bins flow downwards (by gravity) to the weighing bins (for proportioning), to the mixer, and last to the take away screw conveyor. The mixer is a Model 2250 SKAKO blender where dry product is mixed at a maximum rate of approximately 45 ton/hr. The take away screw conveyor returns the blended materials back to the blending plant elevator or diverts the material to the pneumatic pump for transfer to bulk or packhouse storage silos. Emissions from the air slides, screw conveyors, elevators, 4 storage bins, and blender are controlled by Baghouse 72 (EU 072). Emissions from the manual packer, Haver inline packer, jumbo bag filling station, and associated holding bins are controlled by Baghouse 73 (EU 073).

Ship Loading – (EU 079)

Bulk fine materials can also be loaded to ships through the following two distinct scenarios, or any combination of these scenarios simultaneously not to exceed 420 ton/hr. In the first scenario, material being transferred to the finish mill feed silos from Silos 27 and 28 will be diverted from the existing transfer air slide to a new air slide that will discharge into a chute leading directly to the existing surge bins and adjoining pumps in the finish mill building. The new construction will provide for a more direct path to the surge bins and bypass unnecessary handling through the finish mill feed silos. The transfer of material from the new air slide leading to the surge bins/pumps will be controlled by the following 3 existing baghouses in the finish mill: Baghouse 13 (EU 013), Baghouse 17 (EU 017), and Baghouse 20 (EU 020). The combined capacity of the 3 pumps is approximately 210 ton/hr (70 ton/hr each). From the pumps, the material will then be pneumatically transferred through the three respective lines that currently lead to the packhouse silos near the dock. However, new connections to each of the three pneumatic lines will be installed prior to the material arriving at the packhouse building. The new lines will allow for the products to be diverted directly to the shiphold for loadout. Particulate matter emissions from the ship loading will be controlled by up to two of the existing dockside baghouses: Baghouse 45 and/or Baghouse 27. A flexible pipe can be added from the South cyclone separator (EU 045) during ship loading of bulk fine materials in order to allow collected dust from the separator/baghouse to be routed back to the ship rather than the air slides to help prevent product contamination.

In the second scenario, a new 12-line truck loadout bay will be constructed near the dock. Each line is expected to be 5" in diameter. Trucks will arrive to the loadout bay from off-site, from the two truck loadout stations beneath Silos 27 and 28, or from other existing cement truck loadout stations located at the facility. All trucks will contain their own power sources for the pump (i.e. self unloading), and have a typical individual unloading rate of 35 ton/hr. The 12 lines will each lead to the ship for loadout, so up to 12 trucks could unload to the shiphold at one time (i.e. maximum ship loading capacity is 420 ton/hr). Particulate matter emissions from the ship loading will be controlled by up to three of the existing dockside baghouses: Baghouse 44 and/or Baghouse 45 and/or Baghouse 27. In order to help assure that an individual baghouse is not overloaded during ship loading, Baghouses 44 or 45 cannot solely control emissions from the ship. As an alternative option for the second scenario, particulate matter emissions from ship loading may be controlled by a single portable dust collector with a minimum airflow of 10,500 acfm and a maximum airflow of 39,000 acfm. The make and model number of the dust collector may change as long as the minimum specifications and testing requirements in the permit are met. Flexible pipes can be added from the North and South cyclone separators (EU 044-045) during ship loading of bulk fine materials in order to allow collected dust from the separator/baghouse to be routed back to the ship rather than the air slides to help prevent product contamination.

Also present at the facility are several insignificant sources/activities that are identified in Appendix I-1. Included as part of the insignificant sources is a collection of 4 steel storage tanks approximately 15,000 gallons each located south of the finish mills. The tanks contain a variety of additives and grinding aids utilized as needed in the finish mills.

Based on the Title V Air Operation Permit Renewal application received April 20, 2010, this facility is not a major source of hazardous air pollutants (HAPs). The facility is not subject to Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD) since the facility-wide emissions are below the applicability threshold. Multiple emission units are subject to Compliance Assurance Monitoring (CAM) requirements. The facility is also subject to PM RACT (Rule 62-296.700, F.A.C.).

Subsection B. Summary of Emissions Unit ID Nos. and Brief Descriptions.

EU ID No.	Brief Description
Subsection A	***Bulk Coarse/Granular Material Handling/Processing***
053	Bulk Coarse/Fine Ship Unloading - Shiphold
054	Bulk Coarse/Granular Ship Unloading - Material Drop to Hoppers
058	Bulk Coarse/Granular Material Processing - Dryer and Drag Conveyor
059	Bulk Coarse/Granular Ship Unloading - Hoppers to Conveyors to Stacker
074	Dryer Feed – Hopper/Conveyor Transfer
075	Bulk Coarse/Granular Silo
076	Bulk Coarse/Granular Silo - Loadout to Truck
077	Bulk Coarse/Granular Unloading to Pile from Truck or Conveyor
078	Bulk Coarse/Granular Material - Screening/Crushing Operation
083	Bulk Coarse/Granular Material Shipping - Loadout to Truck
Subsection B	***Bulk Fine Material Receiving and Silos 27 & 28***
027	Bulk Fine Transfer - Ship Unload Air Slides to Belt 7
042	Bulk Fine Transfer - Screen to Elevator to Air Slide
043	Bulk Fine Transfer - Silos 27- 28, Air Slides, & Reclaim Elevator
044	Bulk Fine Ship Unloading - North Dockside Vacuum Unloader
045	Bulk Fine Ship Unloading - South Dockside Vacuum Unloader
053	Bulk Coarse/Fine Ship Unloading – Shiphold
060	Bulk Fine Shipping - Truck Loadout from Silo 27
061	Bulk Fine Shipping - Truck Loadout from Silo 28
066	Bulk Fine Transfer - Belt 7 to Hopper to Air Slide
Subsection C	***Finish Mills***
012	Finish Mills – Feed Silos 7A-C, 8A-C, 9A-B, KL
013	Finish Mills - No. 8 Separator and No. 7 Transfer Operation
016	Finish Mills - No. 9 Separators
017	Finish Mills - No. 9 Feed Conveyor, Elevators, Surge Pumps
018	Finish Mills - No. 9 Mill
019	Finish Mills - No. 10 Separators and Feed Silos 10A-B
020	Finish Mills - No. 10 Feed Conveyor, Elevators
021	Finish Mills - No. 10 Mill
080	Finish Mills - Surge Pump B

081	Bulk Coarse/Granular Material Storage - Finish Mill Feed Silo 9C
Subsection D	***Bulk Silos***
006	Bulk Fine Storage – Bulk Silos 19, 20, 21, 24
007	Bulk Fine Storage – Bulk Silos 25, 26
008	Bulk Fine Storage – Bulk Silos 22, 23
Subsection E	***Packhouse Silos/Blending Plant/Packing Operations***
001	Bulk Fine Storage – Packhouse Silos 4, 5, 6
002	Bulk Fine Storage – Packhouse Silos 1, 2, 3
003	Bulk Fine Storage – Packhouse Silos 7, 8, 9, 10, 13, 14, 15, 16
005	Bulk Fine Storage – Packhouse Silos 11, 12, 17, 18
031	Packhouse - Automated Packers
032	Packhouse/Blending Plant - Packer Bag Handling and Reclaim
071	Packhouse - Rotary Packer
072	Blending Plant - Material Handling, Storage and Blending
073	Blending Plant/Packhouse - Manual Packer, Haver inline Packer, Jumbo Bagger
082	Blending Plant - Bulk Coarse/Granular Loadout from Truck
Subsection F	***Ship Loadout***
079	Bulk Fine Shipping - Ship Loading

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). 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
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History

These documents are on file with the permitting authority:
Initial Title V Permit Application received June 14, 1996
Initial Title V Permit issued September 26, 2000
Construction Permit Application received June 21, 2001
Construction Permit No. 0570018-008-AC issued November 1, 2001
Amended Construction Permit No. 0570018-008-AC issued June 27, 2002
Title V Revision Application received October 31, 2002
Title V Air Operation Permit Revision issued December 29, 2003
Application for a Title V Air Operation Permit Renewal received November 24, 2004
Title V Air Operation Permit Renewal issued December 1, 2005
Application for a Title V Air Operation Permit Renewal received April 20, 2010
Additional Information Request dated June 17, 2010
Additional Information Response received September 15, 2010

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. Appendix TV-6, Title V Conditions, is a part of this permit.
{Permitting note: Appendix TV-6, Title V Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]

3. Issuance of this permit does not relieve the permittee from complying with applicable emission limiting standards or other requirements of Chapters 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C., or any other requirements under federal, state, or local law. [Rule 62-210.300, F.A.C.]

4. 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, F.A.C.]

5. 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.]

6. Prevention of Accidental Releases (Section 112(r) of CAA).

A) The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

RMP Reporting Center
Post Office Box 10162
Fairfax, VA 22038
Telephone: (703) 227-7650

and,

B) The permittee shall submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.
[40 CFR 68]

7. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

8. Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements:

a. Limiting vehicle movement in the area of unpaved roads and storage piles;
b. Providing adequate moisture to the storage piles while loading and unloading;
c. Providing adequate moisture to storage piles to control windblown particulate matter during storage;
d. Providing a dust suppressant, as necessary, to the unpaved road;
e. Posting of speed limit sign to control the speed of vehicles on the roads to 10 mph or less;
f. Exercising good housekeeping practices at all times, including the removal of material spillage promptly;
g. Making facility personnel aware of the environmental requirements in this permit.

[Rules 62-4.070(3) and 62-296.320(4)(c)2., F.A.C.]

9. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one. The annual testing requirement is defined as calendar year (January – December).
[Rule 62-213.440, F.A.C.]

10. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

11 The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes may include, and are not limited to the following, and may also require prior authorization before implementation: [Rules 62-210.300, 62-4.060, and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment or major component of such equipment listed in

the process description of this permit.

B) Installation or addition of any equipment which is a source of air pollution.

C) The storage or handling of any products other than those authorized by this permit.

12. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

13. The permittee shall operate and maintain the baghouse cleaning systems (including maintaining the air cleaning pressure where applicable) and a device to measure, within ten percent accuracy, the gas pressure differential across each baghouse. Particulate matter emissions generated during material handling and processing operations must be vented to and controlled by the corresponding baghouse, where applicable.
[Rules 62-213.440(1)(b) and 62-210.650, F.A.C.; Permit No. 0570018-010-AV]

14. [Reserved.]

15. When the Environmental Protection Commission of Hillsborough County, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the permittee to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Environmental Protection Commission of Hillsborough County. Stack sampling facilities must meet the requirements of Appendix SS-1, Stack Sampling Facilities.
[Rules 62-297.310(6) and (7)(b), F.A.C.]

16. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year.
[Rule 62-210.370(3), F.A.C.]

17. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted.
[Rule 62-297.310(7)(a)9., F.A.C.]

18. The permittee shall file a report with the Environmental Protection Commission of Hillsborough County on the results of each compliance test as soon as practical but no later than 45 days after the last sampling run of each test is completed. The test report shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the Environmental Protection Commission of Hillsborough County to determine if the test was properly conducted.
[Rule 62-297.310(8), F.A.C.]

19. The permittee shall retain records of all monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Rule 62-213.440(1)(b)2.b., F.A.C.]

20. Unless otherwise specified in this permit, the unit "ton" shall be defined as a short ton, equivalent to 2,000 pounds (avdp).
[Rule 62-4.070, F.A.C.]

21. In order to limit the potential to emit for the facility and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the maximum allowable particulate matter (PM) emissions for the facility described in this permit shall not exceed 244.0 tons per twelve consecutive month period.
[Rules 62-4.070(3) and 62-210.200 – "Potential to Emit", F.A.C., and Construction Permit No. 0570018-017-AC]

22. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rule 62-213.205, F.A.C.]

23. Relaxations of Restrictions on Pollutant Emitting Capacity. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
[Rule 62-212.400(12)(b), F.A.C.]

24. The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited.
[Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.]

25. The permittee shall submit all compliance related notifications and reports, data, certifications and requests required of this permit to the Environmental Protection Commission of Hillsborough County at:

Environmental Protection Commission of Hillsborough County
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619
Phone: (813) 627-2600
Fax: (813) 627-2660

26. Any reports, data, notifications, certifications and requests required to be sent to the United States Environmental Protection Agency Region 4 should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides and Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

27. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

28. Prior to the Title V Renewal permit application due date (225 days prior to Title V permit

expiration date), the permittee shall conduct particulate matter compliance tests on one finish mill, one bulk fine material ship unloading operation, and the bulk coarse/granular material dryer. [Rule 62-297.310(7)(a)3. F.A.C.]

29. The permittee shall submit a report of all monitoring required at least every six months. All instances of deviations from permit requirements, including those attributable to upset conditions, must be clearly identified in such reports. The reports shall be in accordance with the requirements of Rule 62-210.700(6), F.A.C. for excess emissions resulting from malfunctions and Rule 62-4.130, F.A.C. for plant operations – problems. The reports shall include the probable cause of such deviations, any corrective actions or preventive measures taken, and shall be accompanied by a certification by a responsible official.
[Rule 62-213.440(1)(b)3, F.A.C.]

30. The permittee shall provide at least the minimum requirements for stack sampling facilities as specified in Rule 62-297, F.A.C. Sources sampling platforms, platform access, and other associated work areas, whether permanent or temporary, shall be in accordance with Occupational Safety and Health Administration standards per 29 CFR 1910, Subparts D and E.

31. The attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan* is an enforceable part of this permit. The permittee shall operate all affected emission units and their control equipment in accordance with the latest version of the plan. Failure to adhere to the monitoring requirements specified for the CAM portion of the Plan does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [Rules 62-4.070(3), 62-204.800, 62-296.700(6), and 62-213.440, F.A.C.; 40 CFR 64]

32. The attached *Fugitive Dust Control Plan* is an enforceable part of this permit. The permittee shall operate the facility and all affected emission units in accordance with the latest version of the plan. [Rules 62-4.070(3) and 62-296.320(4)(c)2., F.A.C.; EPC Case #08-708SH0018]

33. In order to address required compliance testing not completed prior to the issue date of this permit, the attached *Appendix CP-1: Compliance Plan* is an enforceable part of this permit.
[Rules 62-4.070(3) and Rule 62-213.420(1)(a)3, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A - Bulk Coarse/Granular Material Handling/Processing

This section addresses the following emissions unit(s).

EU ID No.	Brief Description
053	Bulk Coarse/Fine Ship Unloading - Shiphold
054	Bulk Coarse/Granular Ship Unloading - Material Drop to Hoppers
058	Bulk Coarse/Granular Material Processing - Dryer and Drag Conveyor
059	Bulk Coarse/Granular Ship Unloading - Hoppers to Conveyors to Stacker
074	Dryer Feed – Hopper/Conveyor Transfer
075	Bulk Coarse/Granular Silo
076	Bulk Coarse/Granular Silo - Loadout to Truck
077	Bulk Coarse/Granular Unloading to Pile from Truck or Conveyor
078	Bulk Coarse/Granular Material - Screening/Crushing Operation
083	Bulk Coarse/Granular Material Shipping - Loadout to Truck

{Permitting note(s): These emissions units are regulated under: CAM – 40 CFR 64, Compliance Assurance Monitoring, adopted and incorporated by reference in Rule 62-204.800, F.A.C. (EU 058 only); PM-RACT (Rule 62-296.711, F.A.C.); and Chapter 1-3.52 - Rules of the Environmental Protection Commission of Hillsborough County.}

The following specific conditions apply to the emissions unit(s) listed above:

A.1. Any bulk coarse/granular material may be handled, as long as the material is handled in accordance with the permit and in compliance with the visible emission standards listed in Specific Condition Nos. A.5 and A.6.
[Rule 62-4.070(3), F.A.C.]

Enforceable Potential to Emit (PTE) Parameters

A.2. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following operating limits and equipment ratings shall not be exceeded for the bulk coarse/granular material dryer:

EU	Hours of Operation (hours/12 months)[1]	Product Feed Rate (tons/hour)[2]	Burner Rating (MMBTU/hour)	Baghouse ID No.	Baghouse Design Flowrate (acfm)
058	5,333	150	49	58	31,300

[1]hours per consecutive twelve month period
[2]daily average
[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit Nos. 0570018-006-AC, 014-AC and 017-AC]

A.3. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following operating limits shall not be exceeded for the receiving of bulk coarse/granular material from ships:

EU	Bulk Coarse/Granular Material Throughput (tons/year)[1]	Maximum Handling Rate (ton/hr)	Minimum Moisture Content (% by wt.)
053	820,000	800 – clamshell unloading 2,000 – self unloading	4.8%
054	820,000	800 – clamshell unloading 2,000 – self unloading	4.8%
059	820,000	800	4.8%

[1]tons per consecutive twelve month period
[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit Nos. 0570018-014-AC and 017-AC]

A.4. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following operating limits shall not be exceeded for the bulk coarse/granular material handling and loadout operations:

EU	Bulk Coarse/Granular Material Throughput (tons/year)[1]	Maximum Handling Rate (ton/hr)
074	775,000	150
075	175,000	150
076	175,000	150
077	1,045,000	10 (ton/min)[2] - truck 800 – conveyor from ship
078	50,000	50
083	820,000	400

[1]- tons per consecutive twelve month period
[2]- tons per minute per truck based on an unloading rate of 20 tons in 2 minutes

[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit Nos. 0570018-014-AC and 017-AC]

Emission Limitations and Standards

A.5. In order to limit the potential to emit for this emission unit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following maximum allowable particulate matter (PM) emissions and opacity emissions standards for the dryer shall not be exceeded:

EU	Emissions Standard		
	(grains/dscf)	ton/year[1]	Opacity
058	0.02	11.4	5%

[1]tons per consecutive twelve month period
[Rules 62-210.200 – "Potential to Emit" and 62-296.711(2), F.A.C.; Section 1-3.52 Rules of the Environmental Protection Commission of Hillsborough County; and Construction Permit Nos. 0570018-014-AC and 017-AC]

A.6. The permittee shall not cause, permit, or allow any visible emissions (five percent opacity) from any emission unit included in this section (EU 053, 054, 058, 059, 074, 075, 076, 077, 078, 083).
[Rule 62-296.711(2), F.A.C.; Section 1-3.52 Rules of the Environmental Protection Commission of Hillsborough County; and Construction Permit Nos. 0570018-014-AC and 017-AC]

A.7. The following work practice standards shall apply for dryer (EU 058):
(a) Only bulk coarse/granular materials shall be processed through the dryer.
(b) Emissions from the dryer and dryer outlet drag conveyor shall be vented through the baghouse system.
(c) The baghouse controlling the dryer operation shall be in operation whenever the dryer is actively processing material.
(d) The dryer shall be fired exclusively on natural gas.
[Rule 62-4.070(3), F.A.C.; and Construction Permit Nos. 0570018-006-AC, 014-AC and 017-AC]

A.8. In order to ensure compliance with Specific Condition Nos. A.2, A.3, A.4 and A.5 and Facility-wide Condition 21, the following reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall apply:
(a) Apply water via water sprays to the bulk coarse/granular materials as needed whenever it is handled prior to the dryer to ensure compliance with the opacity limit.
(b) Water sprays shall be permanently attached to the screener/crusher (EU 078) and all associated transfer points, and shall be in operation during any active screening/crushing operations.

(c) Enclose all conveyor belts on the top and sides, with the exception of the conveyor belts associated with EU 078, which are not required to be enclosed since water spray operation is mandatory.
(d) When material is discharged into a receiving hopper from a clamshell, the free fall distance shall not exceed 4 ft. and the clamshell shall not be opened until it is below the sides of the hopper.
(e) Water sprays, or similar chemical coating applicators, shall be used as necessary on the bulk coarse/granular materials at the receiving hoppers, transfer points, storage piles and plant grounds to ensure sufficient dust suppression to meet opacity standards while material is transferred or stored.
(f) Material spillage or leakage from the clamshell shall be kept at a minimum. The clamshell shall be maintained so that it has a tight lip.
(g) The clamshell shall be kept clean at all times, and accumulation of material in the clamshell is prohibited.
(h) Use of front-end loaders and bulldozers in the marine vessel hold shall be minimized to the greatest extent possible.
(i) No blowers shall be used in the marine vessel holds to gather material for the final clean out of the cargo hold.
(j) Tarps or similar coverings shall be used as needed to minimize particulate emissions from the shiphold and other uncontrolled emission points.
(k) Vacuum or wet areas used by vehicles and machines as needed to minimize emissions.
(l) Curtailing or ceasing operations when necessary, especially in situations with high winds, in order to comply with the opacity standard.
(m) Minimize the drop height for all conveyor drops to piles.
(n) Maintain the bulk coarse/granular silo (EU 075) in good working order to assure compliance with the opacity limit during loading.
(o) Maintain the drop sleeve from the bulk coarse/granular silo (EU 075) in good working order and ensure that displaced emissions from the trucks during truck loading are not in excess of the opacity standard.
(p) The maximum number of moveable stick conveyors in operation during ship unloading operations is 3.

[Rules 62-296.320(4)(c) and 62-4.070(3), F.A.C.; and Construction Permit Nos. 0570018-010-AC, 014-AC and 017-AC]

Test Methods and Procedures

A.9. Prior to the beginning of each ship unloading operation of any bulk coarse/granular material, test each shipload of bulk coarse/granular material for moisture content. The permittee shall also test any slag fed to the dryer for moisture content on any date that the dryer is processing slag.
[Rule 62-4.070(3), F.A.C.; and Construction Permit Nos. 0570018-006-AC, 014-AC and 017-AC]

A.10. Test the following emission points for each unit for visible emissions (and particulate matter, if specified) in the time frame indicated:

EU 053 – Bulk Coarse/Granular Ship Unloading - Shiphold

1. Shiphold - Test the shiphold at the point of highest observed opacity during active ship unloading of bulk coarse/granular materials annually during each federal fiscal year (October 1 – September 30).

EU 054 – Bulk Coarse/Granular Ship Unloading - Material Drop to Hoppers

1. Ship Unloading to Hoppers - Test the ship unloader drop into the hoppers annually during each federal fiscal year (October 1 – September 30). The annual tests can be done on any single or combination of hoppers loaded during the testing period.

EU 058 - Bulk Coarse/Granular Material Processing - Dryer and Drag Conveyor

1. Dryer/Baghouse Exhaust – Test the dryer for visible emissions annually during each federal fiscal year (October 1 – September 30). Particulate matter testing is also required prior to the Title V Renewal permit application due date (225 days prior to Title V permit expiration date).

EU 059 – Bulk Coarse/Granular Ship Unloading - Hoppers to Conveyors to Stacker

1. Conveyor Transfers - Test the stick conveyor transfer points following Belt #8, or the mobile stacker conveyor transfer point if operated off of Belt #6 near the dock, while material is unloaded from ships annually during each federal fiscal year (October 1 – September 30).

EU 074 - Dryer Feed – Hopper/Conveyor Transfer

1. Front-end Loader to Dryer Hopper - Test the front-end loader drop of bulk coarse/granular materials into the dryer hopper annually during each federal fiscal year (October 1 – September 30).

EU 075 - Bulk Coarse/Granular Silo

1. Silo - Test the loading of the bulk coarse/granular silo from the highest observed emission point annually during each federal fiscal year (October 1 – September 30).

EU 076 - Bulk Coarse/Granular Silo - Loadout to Truck

1. Material Truck Loadout - Test the truck loading operation from the silo into trucks annually during each federal fiscal year (October 1 – September 30).

EU 077 - Bulk Coarse/Granular Unloading to Pile from Truck or Conveyor

1. Material Receiving to Pile - Test the unloading of bulk coarse/granular materials to piles from trucks or a stacker conveyor drop annually during each federal fiscal year (October 1 – September 30).

EU 078 - Bulk Coarse/Granular Material - Screening/Crushing Operation

1. Feed Hopper – Test the front-end loader drop into the hopper annually during each federal fiscal year (October 1 – September 30).
2. Crusher - Test the crushing operation from the point of highest opacity annually during each federal fiscal year (October 1 – September 30).

3. Screen – Test the screening operation from the point of highest opacity annually during each federal fiscal year (October 1 – September 30).
4. Screen Conveyor Drop to Piles – Test the screen conveyor drops to the piles from the point of highest opacity (i.e. pile with highest noted emissions) annually during each federal fiscal year (October 1 – September 30).

EU 083 – Bulk Coarse/Granular Material Shipping - Loadout to Truck

1. Truck Loadout - Test the loadout of bulk coarse/granular materials to trucks from front-end loaders annually during each federal fiscal year (October 1 – September 30).

Submit two copies of the test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County (EPCHC) within 45 days of testing. The visible emissions should be observed from the highest point of opacity during the period in which the highest opacity emissions can reasonably be expected. [Rules 62-297.310 and 62-4.070(3), F.A.C.]

A.11. The test method for moisture content shall be ASTM Method D-2216 or an equivalent method. The test method for visible emissions shall be shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test method for particulate matter shall be EPA Methods 1, 2, 4, and 5, incorporated and adopted by reference in Rule 62-297, F.A.C. The minimum EPA Method 5 sample volume shall be 30 dry standard cubic feet. The permittee shall record and report the gas pressure differential across the baghouse during each compliance test.
[Rules 62-4.070(3), 62-296.711 and 62-213.440(1)(b), F.A.C.; Section 1-3.52 Rules of the EPC; and Permit No. 0570018-006-AC]

A.12. Testing of emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90-100% of the material handling rates in Specific Condition Nos. A.2., A.3. and A.4. If it is impracticable to test at capacity, then the source 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 Environmental Protection Commission of Hillsborough County. Failure to submit the input rates and actual operating conditions, including pressure differential across the baghouse, may invalidate the test.
[0570018-006-AC and Rule 62-297.310(2), F.A.C.]

A.13. The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes.
[Rule 62-297.310(4)(a), F.A.C.]

A.14. Test emission units EU 053, 054, and 059 (if operated) for visible emissions upon the first

instance of handling a coarse/granular material, already identified in the permit, that has not previously been tested for visible emissions at the facility. Each VE observation shall be made at the point of highest opacity from each handling operation and should be in accordance with Specific Condition Nos. A.11, A.12 and A.13. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-297.310(7)(a)4., 62-297.310(8)(b), and 62-4.070(3), F.A.C.]

Continuous Monitoring Requirements

A.15. The dryer (EU 058) is subject to the CAM requirements contained in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*. Failure to adhere to the monitoring requirements specified in the CAM portion of the appendix does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

A.16. The permittee is subject to the Operation and Maintenance Plan requirements for particulate matter for the dryer baghouse as specified in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*.
[Rules 62-296.700 and 62-213.440(1)(b), F.A.C.; and Construction Permit Nos. 0570018-006-AC and 017-AC]

A.17. The permittee shall maintain records to demonstrate compliance with the requirements of Specific Condition Nos. A.2 - A.6. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least five years:

(a) Daily (if operating)
  (1) Day, Month, Year
  (2) Daily average product feed rate to the dryer when in operation [tons/hour]
  (3) Pressure drop [inches H_2O] across the baghouse as required by the current Operation and Maintenance Plan
  (4) Result of each instantaneous visual emissions determination on the dryer as required by the current Operation and Maintenance Plan
  (5) Amount and type of bulk coarse/granular materials unloaded from ship (tons/day)
  (6) The number of moveable stick conveyors in operation during ship unloading
(b) Monthly
  (1) Month, Year

(2) EU 058 (Dryer and Baghouse) - Hours of operation for the emissions unit during each month [hours] and the most recent consecutive twelve month period [hours/12 months]
(3) Amount and type of bulk coarse/granular material processed through the dryer during each month [tons] and the most recent consecutive twelve month period [tons/12 months]
(4) Summary of bulk coarse/granular material moisture content for each material unloaded from ship, and slag moisture content at the beginning of slag drying, as required by Specific Condition No. A.9. [% weight]
(5) Amount and type of bulk coarse/granular material unloaded from ships during each month [tons] and the most recent consecutive twelve month period [tons/12 months]
(6) Amount and type of bulk coarse/granular material unloaded from trucks during each month [tons] and the most recent consecutive twelve month period [tons/12 months]
(7) Amount of bulk coarse/granular material processed through the screen/crusher [tons] during each month and the most recent consecutive twelve month period [tons/12 months]
(8) Amount and type of bulk coarse/granular material bulk loaded to trucks during each month [tons] and the most recent consecutive twelve month period [tons/12 months]
(9) Amount and type of bulk coarse/granular material loaded into the bulk coarse/granular silo (EU 075) during each month [tons] and the most recent consecutive twelve month period [tons/12 months]
(10) Amount and type of bulk coarse/granular material loaded from the bulk coarse/granular silo into trucks (EU 076) during each month [tons] and the most recent consecutive twelve month period [tons/12 months]
(11) Quantity of natural gas used by the dryer during each month [mmcf] and the most recent consecutive twelve month period [mmcf/12 months]

[Rules 62-213.440(1)(b), 62-4.070(3) and 62-4.160(14), F.A.C.; and Construction Permit Nos. 0570018-005-AC, 014-AC and 017-AC]

Subsection B - Bulk Fine Material Receiving and Silos 27 & 28

This section addresses the following emissions unit(s).

EU ID No.	Brief Description
027	Bulk Fine Transfer - Ship Unload Air Slides to Belt 7
042	Bulk Fine Transfer - Screen to Elevator to Air Slide
043	Bulk Fine Transfer - Silos 27- 28, Air Slides, & Reclaim Elevator
044	Bulk Fine Ship Unloading - North Dockside Vacuum Unloader
045	Bulk Fine Ship Unloading - South Dockside Vacuum Unloader
053	Bulk Coarse/Fine Ship Unloading - Shiphold
060	Bulk Fine Shipping - Truck Loadout from Silo 27
061	Bulk Fine Shipping - Truck Loadout from Silo 28
066	Bulk Fine Transfer - Belt 7 to Hopper to Air Slide

{Permitting note(s): These emissions units are regulated under: CAM – 40 CFR 64, Compliance Assurance Monitoring, adopted and incorporated by reference in Rule 62-204.800, F.A.C. (except EU 044-045); PM-RACT (Rule 62-296.711, F.A.C.); and Chapter 1-3.52 - Rules of the Environmental Protection Commission of Hillsborough County.}

The following specific conditions apply to the emissions unit(s) listed above:

Enforceable Potential to Emit (PTE) Parameters

B.1. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following operating limits and equipment ratings shall not be exceeded:

EU	Hours of Operation (hours/12 months)[1]	Material Handling Rate (tons/hour)[2]	Baghouse ID No.	Baghouse Design Flowrate (acfm)
027	1,733[3]	680	27	18,000
042	1,733	680	42	8,000
043	8,760	680 (340 each silo)	43	10,000
044	1,733[3]	340	44	5,280
045	1,733[3]	340	45	5,280
060	8,760	340	60	7,000
061	8,760	340	61	7,000
053	8,760	613 (self unloading vessel) 473 (bulk carrier vessel)	N/A	N/A
066	1,733	680	66	5,000

[1]hours per consecutive twelve month period.
[2]daily average based on ship loading operation
[3]hours recorded for these units in this section is for ship unloading activities
[Rule 62-210.200 – "Potential to Emit", F.A.C., and Construction Permit Nos. 0570018-005-AC, 013-AC and 017-AC]

B.2. The maximum throughput of bulk fine materials unloaded from ships is limited to 900,000 tons during any consecutive twelve month period. The maximum throughput of bulk fine materials (ship and truck unloading) loaded through the silos (Silos 27 and 28) is also limited to 900,000 tons during any consecutive twelve month period.
[Rule 62-4.070(3) and 62-210.200 – "Potential to Emit", F.A.C., and Construction Permit Nos. 0570018-005-AC, 013-AC and 017-AC]

Emission Limitations and Standards

B.3. In order to limit the potential to emit for these emission units and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following maximum allowable particulate matter (PM) emissions and opacity emissions standards shall not be exceeded:

EU	Baghouse ID No.	Emissions Standard		
		(grains/dscf)	ton/yr[1]	Opacity
027	27	0.02	2.7	5%
042	42	0.02	1.2	5%
043	43	0.02	7.5	5%
044	44	0.02	0.8	5%
045	45	0.02	0.8	5%
053	N/A	N/A	N/A[2]	5%
060	60	0.02	5.3	5%
061	61	0.02	5.3	5%
066	66	0.02	0.7	5%

[1]tons per consecutive twelve month period
[2]When operating under appropriate work practice standards and reasonable precautions, the emissions from ship holds that are not captured by the vacuum unloading arms are expected to be minimal.
[Rules 62-210.200 – "Potential to Emit" and 62-296.711(2), F.A.C.; Section 1-3.52 Rules of the Environmental Protection Commission of Hillsborough County; and Construction Permit Nos. 0570018-005-AC, 013-AC and 017-AC]

B.4. The following work practice standards apply:

(a) Only one vessel (ship) may be unloaded at a time.
(b) Particulate emissions generated during bulk fine material handling must be vented through the corresponding baghouse, with the exception of the shiphold.
(c) Due care shall be used in vacuuming out open holds to prevent tunneling and collapsing product from causing excessive dust in the bulk carrier vessel. Product is not to be pumped from one open hold to another open hold.
(d) Use covers, wind shields and/or tarps at the shiphold as necessary during bulk fine material ship unloading in order to assure compliance with the opacity standard.
(e) Any bulk fine material may be handled, as long as the material is handled in accordance with the permit and in compliance with the visible emission standards listed in Specific Condition No. B.3.
(f) No more than 8 trucks can unload to Silos 27 and 28 at one time.
(g) The jumbo bag filling stations shall be maintained in proper order to function as designed. Ensure proper operation of dust control system prior to filling any jumbo bags.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; and Construction Permit Nos. 0570018-005-AC, 013-AC and 017-AC]

B.5. All reasonable precautions shall be taken to prevent the emissions of unconfined particulate matter from any activity, including, but not limited to, vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; and industrial related activities such as loading, unloading, storing, and handling. Reasonable precautions at these emissions units include, but are not limited to, the following:

(a) Maintaining process and transport system in good operating condition.
(b) Limiting truck traffic to paved roads, where possible.
(c) Removing dust from roadways as necessary, preferably by vacuuming.
(d) Attending to spills and malfunctions promptly. Cease operations if necessary.
(e) Taking added precautions during windy conditions.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; and Construction Permit Nos. 0570018-005-AC, 013-AC and 017-AC]

<u>Test Methods and Procedures</u>

B.6. Test all the emission units in this section (EU 027, 042-045, 053, 060, 061, 066) for visible emissions annually during each federal fiscal year (October 1 – September 30). Testing for Silos 27 and 28 shall include: 1) the exhaust of the baghouses while silos or trucks are actively being loaded; 2) each truck loading spout at loadout point to trucks; and 3) the jumbo bagging operation at filling point to bags (Silo 28). Observation of the shiphold (EU 053) shall include documentation of the highest point of emissions observed released from the ship's cargo hold

during the testing period. Particulate matter testing is also required on one of the ship unloading vacuum unloaders (EU 044 or 045) prior to the Title V Renewal permit application due date (225 days prior to Title V permit expiration date). Submit two copies of the test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County (EPCHC) within 45 days of testing. The test observations shall be made from the highest point of opacity during the period in which the highest opacity emissions can reasonably be expected.
[Rules 62-297.310 and Rule 62-4.070(3), F.A.C.]

B.7. The test method for visible emissions shall be shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test method for particulate matter shall be EPA Methods 1, 2, 4, and 5, incorporated and adopted by reference in Rule 62-297, F.A.C. The minimum EPA Method 5 sample volume shall be 30 dry standard cubic feet. The permittee shall record and report the gas pressure differential across each baghouse during each required compliance test.
[Rules 62-4.070(3), 62-296.711 and 62-213.440(1)(b), F.A.C.; Section 1-3.52 Rules of the EPC; and Permit No. 0570018-005-AC]

B.8. Testing of emissions shall be conducted with the sources operating at capacity. Capacity for the ship unloading operation is defined as 90-100% of the material handling rates in Specific Condition No. B.1. If it is impracticable to test at capacity, then the source 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 Environmental Protection Commission of Hillsborough County. Failure to submit the input rates and actual operating conditions, including the type of vessel and the pressure differential across the baghouse, may invalidate the test.
[Rule 62-297.310(2), F.A.C.; and Permit No. 0570018-005-AC]

B.9. The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes.
[Rule 62-297.310(4)(a), F.A.C.]

B.10 Except for the PM test required prior to renewal, a visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test for the ship unloading operations since they are equipped with baghouses. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Environmental Protection Commission of Hillsborough County pursuant to the authority granted under Rule 62-297.620(4), F.A.C. hereby allows the particulate testing to be waived in lieu of a visible emission standard not to exceed an opacity of 5%. If the EPC has reason to believe that the particulate

weight emission standard is not being met, it shall require that compliance be demonstrated by Method 5 testing.
[Rules 62-296.711, 62-297.620, and 62-297.310(7)(b), F.A.C.]

Continuous Monitoring Requirements

B.11. Except for EU 053, EU 044, and EU 045, these emissions units are subject to the CAM requirements contained in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*. Failure to adhere to the monitoring requirements specified in the CAM portion of the appendix does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

B.12. The permittee is subject to the Operation and Maintenance Plan requirements for particulate matter for all the emission units in this section (except EU 053) controlled by a baghouse as specified in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*.
[Rules 62-296.700 and 62-213.440(1)(b), F.A.C.; and Construction Permit Nos. 0570018-006-AC and 017-AC]

B.13. The permittee shall maintain records to demonstrate compliance with the requirements of Specific Condition Nos. B.1., B.2., and B.3. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least five years:

(a) Daily (if operating)
  (1) Day, Month, Year
  (2) Pressure drop [inches H_2O] across each baghouse as required by the current Operation and Maintenance Plan
  (3) Result of each instantaneous visual emissions determination on each emissions unit with a baghouse as required by the current Operation and Maintenance Plan

(b) Monthly
  (1) Month, Year
  (2) Hours of operation for each emissions unit during ship unloading or truck unloading operations during the month [hours] and the most recent consecutive twelve month period [hours/12 months]

(3) Amount and type of bulk fine material unloaded from ships and trucks (to Silos 27 and 28) during each month [tons] and the most recent consecutive twelve month period [tons/12 months]

[Rule 62-4.070(3), 62-4.160(14), and 62-213.440(1)(b), F.A.C.; and Construction Permit Nos. 0570018-005-AC and 017-AC]

Subsection C - Finish Mills

This section addresses the following emissions unit(s).

EU ID No.	Brief Description
012	Finish Mills – Feed Silos 7A-C, 8A-C, 9A-B, KL
013	Finish Mills - No. 8 Separator and No. 7 Transfer Operation
016	Finish Mills - No. 9 Separators
017	Finish Mills - No. 9 Feed Conveyor, Elevators, Surge Pumps
018	Finish Mills - No. 9 Mill
019	Finish Mills - No. 10 Separators and Feed Silos 10A-B
020	Finish Mills - No. 10 Feed Conveyor, Elevators
021	Finish Mills - No. 10 Mill
080	Finish Mills - Surge Pump B
081	Bulk Coarse/Granular Material Storage - Finish Mill Feed Silo 9C

{Permitting note(s): These emissions units are regulated under: CAM – 40 CFR 64, Compliance Assurance Monitoring, adopted and incorporated by reference in Rule 62-204.800, F.A.C. (except EU 081); PM-RACT (Rule 62-296.711, F.A.C.); and Chapter 1-3.52 - Rules of the Environmental Protection Commission of Hillsborough County.}

The following specific conditions apply to the emissions unit(s) listed above:

Enforceable Potential to Emit (PTE) Parameters

C.1. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following operating limits and equipment ratings shall not be exceeded:

EU	Hours of Operation (hours/12 months)[1]	Material Handling/Loading Rate (tons/hour)[2]	Baghouse ID No.	Baghouse Design Flowrate (acfm)
012	8,760	1,100 (by transfer) 35 (per truck)	12	20,000
013	8,760	75	13	13,000
016	8,760	75	16	35,000
017	8,760	75	17	13,000
018	8,760	75	18	15,000
019	8,760	75	19	35,000
020	8,760	75	20	13,000
021	8,760	75	21	15,000

080	8,760	75	80	300

[1]hours per consecutive twelve month period
[2]daily average
[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit Nos. 0570018-013-AC and 017-AC]

C.2. The combined amount of bulk fine materials processed through the finish mills (EU 013, EU 016-021) is limited to 900,000 tons during any consecutive twelve month period.
[Rule 62-4.070(3) and 62-210.200 – "Potential to Emit", F.A.C.]

C.3. . In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the maximum throughput of bulk coarse/granular material through Silo 9C (EU 081) shall not exceed 270,000 ton/yr, and the maximum loading rate to that silo shall not exceed 150 ton/hr (daily average).
[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit No. 0570018-017-AC]

Emission Limitations and Standards

C.4. In order to limit the potential to emit for these emission units and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following maximum allowable particulate matter (PM) emissions and opacity emissions standards shall not be exceeded:

EU	Emissions Standard		
	(grains/dscf)	ton/year[1]	Opacity
012	0.02	15.0	5%
013	0.02	9.8	5%
016	0.02	22.1	5%
017	0.02	9.8	5%
018	0.02	9.5	5%
019	0.02	22.1	5%
020	0.02	9.8	5%
021	0.02	9.5	5%
080	0.02	0.2	5%
081	N/A	N/A	5%

[1]tons per consecutive twelve month period
[Rules 62-210.200 – "Potential to Emit" and 62-296.711(2), F.A.C.; Section 1-3.52 Rules of the Environmental Protection Commission of Hillsborough County; and Construction Permit Nos. 0570018-013-AC and 017-AC]

C.5. The following work practice standards apply:

(a) Particulate emissions generated during bulk fine material handling must be vented through the corresponding baghouse.

(b) Water sprays, or similar chemical coating applicators, shall be used as necessary on the bulk coarse/granular materials loaded into Silo 9C to ensure sufficient dust suppression to meet opacity standards while material is transferred or stored.

(c) The permittee shall maintain the integrity of the enclosures around the bucket elevator and conveyors handling bulk coarse/granular materials delivered to Silos 9C, 10A, and 10B, and the baghouse controlling to Silos 10A and 10B shall be in operation during any material loading.

(d) Any bulk fine material may be handled, as long as the material is handled in accordance with the permit and in compliance with the visible emission standards listed in Specific Condition No. C.4.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; and Construction Permit Nos. 0570018-013-AC and 017-AC]

Test Methods and Procedures

C.6. Test all the emission units in this subsection (EU 012, 013, 016-021, 081), with the exception of EU 080, for visible emissions annually during each federal fiscal year (October 1 – September 30). Particulate matter testing is also required on one of the finish mills (EU 016 thru 018 or EU 019 thru 021) prior to the Title V Renewal permit application due date (225 days prior to Title V permit expiration date). Submit two copies of the test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County (EPCHC) within 45 days of testing. The test observations shall be made from the highest point of opacity during the period in which the highest opacity emissions can reasonably be expected.
[Rules 62-297.310 F.A.C., and Rule 62-4.070(3), F.A.C.]

C.7. The test method for visible emissions shall be shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test method for particulate matter shall be EPA Methods 1, 2, 4, and 5, incorporated and adopted by reference in Rule 62-297, F.A.C. The minimum EPA Method 5 sample volume shall be 30 dry standard cubic feet. The permittee shall record and report the gas pressure differential across each baghouse during each required compliance test.
[Rules 62-4.070(3), 62-296.711 and 62-213.440(1)(b), F.A.C.; Section 1-3.52 Rules of the EPC; and Permit No. 0570018-005-AC]

C.8. Testing of emissions shall be conducted with the source operating at capacity. Capacity is

defined as 90-100% of rated capacity of the loading rates in Specific Condition Nos. C.1 and C.3. If it is impracticable to test at capacity, then the source 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 Environmental Protection Commission of Hillsborough County. Failure to submit the input rates and actual operating conditions, including the pressure differential across the baghouse, may invalidate the test.
[Rule 62-297.310(2), F.A.C.]

C.9. The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes.
[Rule 62-297.310(4)(a), F.A.C.]

C.10. Except for the PM tests required prior to renewal, a visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test for the finish mills since the emission units are equipped with baghouses. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Environmental Protection Commission of Hillsborough County pursuant to the authority granted under Rule 62-297.620(4), F.A.C. hereby allows the particulate testing to be waived in lieu of a visible emission standard not to exceed an opacity of 5%. If the EPC has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated by Method 5 testing.
[Rules 62-296.711 and 62-297.310(7)(b), F.A.C.]

Continuous Monitoring Requirements

C.11. Except for EU 081, these emissions units are subject to the CAM requirements contained in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*. Failure to adhere to the monitoring requirements specified in the CAM portion of the appendix does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

C.12. The permittee is subject to the Operation and Maintenance Plan requirements for particulate matter for all the emission units in this section (except EU 081) controlled by a baghouse as specified in the attached combined *Operation and Maintenance (O&M) Plan/Compliance*

Assurance Monitoring (CAM) Plan.
[Rules 62-296.700 and 62-213.440(1)(b), F.A.C.; and Construction Permit No. 0570018-017-AC]

C.13. The permittee shall maintain records to demonstrate compliance with the requirements of Specific Condition Nos. C.1., C.2.,C.3, and C.4. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least five years:

(a) Daily (if operating)
  (1) Day, Month, Year
  (2) Pressure drop [inches H_2O] across each baghouse as required by the current Operation and Maintenance Plan
  (3) Result of each instantaneous visual emissions determination on each emission unit with a baghouse (except EU 080) as required by the current Operation and Maintenance Plan

(b) Monthly
  (1) Month, Year
  (2) Total combined amount of bulk fine material processed through the finish mills during each month [tons] and the most recent consecutive twelve month period [tons/12 months]
  (3) Amount and type of bulk coarse/granular material loaded into Silo 9C (EU 081) during each month [tons] and the most recent consecutive twelve month period [tons/12 months]

[Rule 62-4.070(3), 62-4.160(14), and 62-213.440(1)(b), F.A.C.]

Subsection D - Bulk Silos

This section addresses the following emissions unit(s).

EU ID No.	Brief Description
006	Bulk Fine Storage – Bulk Silos 19, 20, 21, 24
007	Bulk Fine Storage – Bulk Silos 25, 26
008	Bulk Fine Storage – Bulk Silos 22, 23

{Permitting note(s): These emissions units are regulated under: CAM – 40 CFR 64, Compliance Assurance Monitoring, adopted and incorporated by reference in Rule 62-204.800, F.A.C.; PM-RACT (Rule 62-296.711, F.A.C.); and Chapter 1-3.52 - Rules of the Environmental Protection Commission of Hillsborough County.}

The following specific conditions apply to the emissions unit(s) listed above:

Enforceable Potential to Emit (PTE) Parameters

D.1. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following operating limits and equipment ratings shall not be exceeded:

EU	Hours of Operation (hours/12 months)[1]	Material Handling/Loading Rate (tons/hour)[2]	Baghouse ID No.	Baghouse Design Flowrate (acfm)
006	8,760	150 (by transfer) 35 (by truck) 500 (by ship)	6	6,250
007	8,760	150	7	6,000
008	8,760	150 (by transfer) 500 (by ship)	8	6,250

[1]hours per consecutive twelve month period
[2]daily average
[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit Nos. AC29-249252 and 0570018-017-AC]

Emission Limitations and Standards

D.2. In order to limit the potential to emit for these emission units and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following maximum allowable particulate matter (PM) emissions and opacity

emissions standards shall not be exceeded:

EU	Emissions Standard		
	(grains/dscf)	ton/year[1]	Opacity
006	0.02	4.7	5%
007	0.02	4.5	5%
008	0.02	4.7	5%

[1]tons per consecutive twelve month period
[Rules 62-210.200 – "Potential to Emit" and 62-296.711(2), F.A.C.; Section 1-3.52 Rules of the Environmental Protection Commission of Hillsborough County; and Construction Permit No. 0570018-017-AC]

D.3. The following work practice standards apply:

(a) Particulate emissions generated during bulk fine material handling must be vented through the corresponding baghouse.
(b) Any bulk fine material may be handled, as long as the material is handled in accordance with the permit and in compliance with the visible emission standards listed in Specific Condition No. D.2.
(c) No more than 1 truck can unload to Silos 19, 20 or 21 at one time.
(d) The jumbo bag filling stations shall be maintained in proper order to function as designed. Ensure proper operation of dust control system prior to filling any jumbo bags.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; and Construction Permit No. 0570018-017-AC]

Test Methods and Procedures

D.4. Test all the emission units in this section (EU 006-008) for visible emissions annually during each federal fiscal year (October 1 – September 30). Testing shall include: 1) the exhaust of each baghouse while corresponding silos are being loaded; 2) each truck loading spout at loadout point to trucks; and 3) each jumbo bagging operation at filling points to bags.

Submit two copies of the test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County (EPCHC) within 45 days of testing. The test observations shall be made from the highest point of opacity during the period in which the highest opacity emissions can reasonably be expected.
[Rules 62-297.310 and Rule 62-4.070(3), F.A.C.]

D.5. The test method for visible emissions shall be shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test method for particulate matter shall be EPA Methods 1, 2, 4, and 5, incorporated and adopted by reference in Rule 62-297, F.A.C. The

minimum EPA Method 5 sample volume shall be 30 dry standard cubic feet. The permittee shall record and report the gas pressure differential across each baghouse during each required compliance test.
[Rules 62-4.070(3), 62-296.711 and 62-213.440(1)(b), F.A.C.; Section 1-3.52 Rules of the EPC; and Permit No. 0570018-005-AC]

D.6. Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the material handling rates in Specific Condition No. D.1. If it is impracticable to test at capacity, then the source 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 Environmental Protection Commission of Hillsborough County. Failure to submit the input rates and actual operating conditions, including the pressure differential across the baghouse, may invalidate the test.
[Rule 62-297.310(2), F.A.C.]

D.7. The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes.
[Rule 62-297.310(4)(a), F.A.C.]

D.8. A visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test for the bulk silo operations since they are equipped with baghouses. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Environmental Protection Commission of Hillsborough County pursuant to the authority granted under Rule 62-297.620(4), F.A.C. hereby allows the particulate testing to be waived in lieu of a visible emission standard not to exceed an opacity of 5%. If the EPC has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated by Method 5 testing.
[Rules 62-296.711, 62-297.620, and 62-297.310(7)(b), F.A.C.]

<u>Continuous Monitoring Requirements</u>

D.9. These emissions units are subject to the CAM requirements contained in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*. Failure to adhere to the monitoring requirements specified in the CAM portion of the appendix does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

D.10. The permittee is subject to the Operation and Maintenance Plan requirements for particulate matter for all the emission units in this section controlled by a baghouse as specified in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*.
[Rules 62-296.700 and 62-213.440(1)(b), F.A.C.; and Construction Permit No. 0570018-017-AC]

D.11. The permittee shall maintain records to demonstrate compliance with the requirements of specific conditions D.1., D.2., and D.10. The records shall include, at a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least five years:

(a) Daily
  (1) Day, Month, Year
  (2) Pressure drop [inches H_2O] across each baghouse as required by the Operation and Maintenance Plan
  (3) Result of each instantaneous visual emissions determination on each emissions unit with a baghouse as required by the Operation and Maintenance Plan

(b) Monthly
  (1) Month, Year
  (2) The amount of bulk fine materials handled by the Bulk Silos during the month [tons] and the most recent consecutive twelve month period [tons/12 months]

[Rule 62-4.070(3), 62-4.160(14), and 62-213.440(1)(b), F.A.C.; and Construction Permit No. 0570018-017-AC]

Subsection E - Packhouse Silos/Blending Plant/Packing Operations

This section addresses the following emissions unit(s).

EU ID No.	Brief Description
001	Bulk Fine Storage – Packhouse Silos 4, 5, 6
002	Bulk Fine Storage – Packhouse Silos 1, 2, 3
003	Bulk Fine Storage – Packhouse Silos 7, 8, 9, 10, 13, 14, 15, 16
005	Bulk Fine Storage – Packhouse Silos 11, 12, 17, 18
031	Packhouse - Automated Packers
032	Packhouse/Blending Plant - Packer Bag Handling and Reclaim
071	Packhouse - Rotary Packer
072	Blending Plant/Packhouse - Material Handling, Storage and Blending
073	Blending Plant/Packhouse - Manual Packer, Haver inline Packer, Jumbo Bagger
082	Blending Plant - Bulk Coarse/Granular Loadout from Truck

{Permitting note(s): These emissions units are regulated under: CAM – 40 CFR 64, Compliance Assurance Monitoring, adopted and incorporated by reference in Rule 62-204.800, F.A.C. (except EU 082); PM-RACT (Rule 62-296.711, F.A.C.); and Chapter 1-3.52 - Rules of the Environmental Protection Commission of Hillsborough County.}

The following specific conditions apply to the emissions unit(s) listed above:

Enforceable Potential to Emit (PTE) Parameters

E.1. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following operating limits and equipment ratings shall not be exceeded:

EU	Hours of Operation (hours/12 months)[1]	Material Handling/Loading Rate (tons/hour) [2]	Baghouse ID No.	Baghouse Design Flowrate (acfm)
001	8,760	150	1	4,800
002	8,760	150	2	4,800
003	8,760	150	3	9,260
005	8,760	150 (by transfer) 35 (by truck) 500 (by ship)	5	12,000
031	8,760	150	31	12,000
032	8,760	150	32	13,000

071	8,760	141	71	20,000
072	8,760	45	72	8,000
073	8,760	210	73	8,000

[1]hours per consecutive twelve month period
[2]daily average
[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit Nos. 0570018-014-AC and 017-AC]

E.2. In order to limit the potential to emit and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the maximum throughput of bulk coarse/granular material bulk loaded to the blending plant hopper (EU 082) shall not exceed 175,000 ton/yr, and the maximum loading rate to the elevated bins shall not exceed 150 ton/hr.
[Rule 62-210.200 – "Potential to Emit", F.A.C.; and Construction Permit No. 0570018-017-AC]

Emission Limitations and Standards

E.3. In order to limit the potential to emit for these emission units and remain below the applicability threshold for Rule 62-212.400, F.A.C. – Prevention of Significant Deterioration (PSD), the following maximum allowable particulate matter (PM) emissions and opacity emissions standards shall not be exceeded:

EU	Emissions Standard		
	(grains/dscf)	ton/year[1]	Opacity
001	0.02	3.6	5%
002	0.02	3.6	5%
003	0.02	7.0	5%
005	0.02	9.0	5%
031	0.02	9.0	5%
032	0.02	9.8	5%
071	0.01	7.5	5%
072	0.015	4.5	5%
073	0.015	4.5	5%
082	N/A	N/A	5%

[1]tons per consecutive twelve month period
[Rules 62-210.200 – "Potential to Emit" and 62-296.711(2), F.A.C.; Section 1-3.52 Rules of the Environmental Protection Commission of Hillsborough County; and Construction Permit Nos. 0570018-014-AC and 017-AC]

E.4. In order to ensure compliance with Specific Condition Nos. E.2, E.3 and E.5, the following reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall apply:

(a) All bulk fine material handling and packaging operations shall be vented to the designated control device (baghouse) as designed.
(b) The control devices shall be in operation at all times when any material is being processed through the related handling/packaging systems.
(c) The manual and Haver inline packing operations may operate simultaneously with the jumbo bagging system on the blending plant, as long as the combined process rate does not exceed 210 ton/hr.
(d) Any bulk fine material may be handled, as long as the material is handled in accordance with the permit and in compliance with the visible emission standards listed in Specific Condition No. E.3.
(e) Water sprays, or similar chemical coating applicators, shall be used as necessary on the bulk coarse/granular materials loaded into the blending plant hopper to ensure sufficient dust suppression to meet opacity standards while material is transferred or stored.
(f) The permittee shall maintain the integrity of the enclosures around the hopper, conveyors and bucket elevator handling bulk materials delivered to the blending plant.
(g) The jumbo bag filling station shall be maintained in proper order to function as designed. Ensure proper operation of dust control system prior to filling any jumbo bags.
(h) No more than 3 trucks can unload simultaneously to the elevated storage bins on the blending plant at one time.

[Rules 62-296.320(4)(c) and 62-4.070(3), F.A.C.; and Construction Permit No. 0570018-017-AC]

Test Methods and Procedures

E.5. Test all the emission units in this subsection (EU 001-003, 005, 031, 032, 071-073, 082) for visible emissions annually during each federal fiscal year (October 1 – September 30). Testing shall include observation of the jumbo bagging operation at filling points to bags. Submit two copies of the test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County (EPCHC) within 45 days of testing. The visible emissions should be observed from the highest point of opacity during the period in which the highest opacity emissions can reasonably be expected. [Rules 62-297.310 F.A.C., and Rule 62-4.070(3), F.A.C.]

E.6. The permittee shall also test the exhaust from the baghouse controlling EU 071 for particulate matter emissions prior to the Title V Renewal permit application due date (225 days prior to Title V permit expiration date) in order to demonstrate compliance with the gr/dscf emission limit specified in Specific Condition No. E.3. Based on the results of the particulate matter stack test, EPC may

require future particulate matter stack tests at an increased frequency deemed necessary to provide reasonable assurance of continued compliance. The permittee shall submit two copies of the test data to the EPC within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-297.310 and 62-4.070(3), F.A.C.]

E.7. The test method for visible emissions shall be shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test method for particulate matter shall be EPA Methods 1, 2, 4, and 5, incorporated and adopted by reference in Rule 62-297, F.A.C. The minimum EPA Method 5 sample volume shall be 30 dry standard cubic feet. The permittee shall record and report the gas pressure differential across each baghouse during each required compliance test.
[Rules 62-4.070(3), 62-296.711 and 62-213.440(1)(b), F.A.C.; and Section 1-3.52 Rules of the EPC]

E.8. Testing of emissions shall be conducted with the sources operating at capacity. Capacity is defined as 90-100% of the material handling rates in Specific Condition No. E.1. For the new blending plant handling (EU 072), the blender should be in operation, including normal material transfer through the elevator, during the test. For the blending plant bagging/packing (EU 073) operation, the manual packer, Haver inline packer and jumbo bag filling station should be in operation simultaneously, including normal material transfer to the holding bins, during the test. If it is impracticable to test at capacity, then the source 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 Environmental Protection Commission of Hillsborough County. Failure to submit the input rates and actual operating conditions, including the pressure differential across the baghouse, may invalidate the test.
[Rule 62-297.310(2), F.A.C.]

E.9. The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes.
[Rule 62-297.310(4)(a), F.A.C.]

E.10. Except for the PM test required prior to renewal, a visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test for the remaining emission units, since they are equipped with a baghouse. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Environmental Protection Commission of Hillsborough County pursuant to the authority granted under Rule 62-297.620(4), F.A.C. hereby allows the particulate testing to be waived in lieu of a visible emission standard not

to exceed an opacity of 5%. If the EPC has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated by Method 5 testing.
[Rules 62-296.711 and 62-297.310(7)(b), F.A.C.]

Continuous Monitoring Requirements

E.11. Except for EU 082, these emissions units are subject to the CAM requirements contained in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*. Failure to adhere to the monitoring requirements specified in the CAM portion of the appendix does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

E.12. The permittee is subject to the Operation and Maintenance Plan requirements for particulate matter for all the emission units in this section (except EU 082) controlled by a baghouse as specified in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*.
[Rules 62-296.700 and 62-213.440(1)(b), F.A.C.; and Construction Permit Nos. 0570018-006-AC and 017-AC]

E.13. The permittee shall maintain records to demonstrate compliance with the requirements of Specific Condition Nos. E.1., E.2., E.3. and E.12. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least five years:

(a) Daily (if operating)
  (1) Day, Month, Year
  (2) Pressure drop [inches H_2O] across each baghouse as required by the current Operation and Maintenance Plan
  (3) Result of each instantaneous visual emissions determination on each emissions unit as required by the current Operation and Maintenance Plan

(b) Monthly
  (1) Month, Year
  (2) The combined amount of bulk fine materials packaged by the rotary packer (EU 071) during the month [tons] and the most recent consecutive twelve month period [tons/12 months]

(3) The amount of blended bulk fine materials packaged through the new blending plant (EU 072 and EU 073) during the month [tons] and the most recent consecutive twelve month period [tons/12 months]
(4) The amount of bulk fine materials packaged through the automatic packers (EU 031 and EU 032) during the month [tons] and the most recent consecutive twelve month period [tons/12 months]
(5) The amount of bulk fine materials handled by the Packhouse Silos during the month [tons] and the most recent consecutive twelve month period [tons/12 months]
(6) Amount and type of bulk coarse material loaded into the blending plant hopper (EU 082) during each month [tons] and the most recent consecutive twelve month period [tons/12 months]

[Rules 62-213.440(1)(b), 62-4.070(3) and 62-4.160(14), F.A.C.]

Subsection F - Ship Loadout

This section addresses the following emissions unit(s).

EU ID No.	Brief Description
079	Bulk Fine Shipping - Ship Loading

{Permitting note(s): These emissions units are regulated under: CAM – 40 CFR 64, Compliance Assurance Monitoring, adopted and incorporated by reference in Rule 62-204.800, F.A.C. (except EU 044-045); PM-RACT (Rule 62-296.711, F.A.C.); and Chapter 1-3.52 - Rules of the Environmental Protection Commission of Hillsborough County. This operation utilizes baghouses already described in Subsection B for use during ship unloading. Their use in this section is specifically directed at ship loading activities.}

The following specific conditions apply to the emissions unit(s) listed above:

F.1. In order to limit the potential to emit for these emission units and avoid PSD, the facility shall construct and operate the ship loading activities consistent with Scenario 1 and/or Scenario 2 from the process description, but the two scenarios can only operate simultaneously at a ship loading rate not to exceed 420 ton/hr. The total combined hours of operations for both scenarios cannot exceed 3,000 hrs/12-months. Use of a portable dust collector as part of Scenario 2 is limited to 600 hours/12-months, and is considered part of the total 3,000 hrs/12-month limit for ship loading activities.
[Rules 62-4.070(3) and 62-210.200 – "Potential to Emit", F.A.C., and Construction Permit Nos. 0570018-012-AC and 017-AC]

Enforceable Potential to Emit (PTE) Parameters

F.2. The following operating limits and equipment ratings shall not be exceeded:
[Rule 62-210.200 – "Potential to Emit", F.A.C., and Construction Permit Nos. 0570018-012-AC and 017-AC]

Scenario 1

E.U.	Hours of Operation [hours/12 months][1]	Material Handling Rate [tons/hour] [2]	Baghouse I.D. No.	Baghouse Design Flowrate [acfm]
079	3,000	210	45	5,280
079	3,000	210	27	18,000

[1]hours per consecutive twelve month period while processing bulk fine materials for ship loading
[2]daily average

Scenario 2

EU	Hours of Operation [hours/12 months][1]	Material Handling Rate [tons/hour] [2]	Baghouse ID No.	Baghouse Flowrate [acfm]
079	3,000	420	44	5,280
079	3,000	420	45	5,280
079	3,000	420	27	18,000
079	600[3]	420	Portable	39,000[4]

[1]hours per consecutive twelve month period while processing bulk fine materials for ship loading
[2]daily average
[3]hour limit is part of total 3,000 hrs/yr allowed for ship loading
[4]maximum flowrate allowed

F.3. The hours of operations for the ship loading operation are limited as stated in Specific Condition No. F.2. The stated hour limits must be tracked for each individual operation during ship loading activities.
[Rules 62-4.070(3) and 62-210.200 – "Potential to Emit", F.A.C.]

Emission Limitations and Standards

F.4. In order to limit the potential to emit for these emission units, the following maximum allowable particulate matter (PM) emissions and opacity emissions standards shall not be exceeded:
[Rules 62-210.200 – "Potential to Emit" and 62-296.711(2), F.A.C.; Section 1-3.52 Rules of the Environmental Protection Commission of Hillsborough County; and Construction Permit Nos. 0570018-012-AC and 017-AC]

Scenario 1

E.U.	Baghouse I.D. No.	Emissions Standard		
		[grains/dscf]	TPY[1]	Opacity
079	45	0.02	1.4	5%
079	27	0.02	4.6	5%

[1]tons per consecutive twelve month period

[Permit Note: The PM and hour limits for the ship loading baghouses are in addition to the limits for ship unloading stated in Subsection B.]

Scenario 2

E.U.	Baghouse I.D. No.	Emissions Standard		
		[grains/dscf]	TPY[1]	Opacity
079	44	0.02	1.4	5%
079	45	0.02	1.4	5%
079	27	0.02	4.6	5%
079	Portable	0.02	2.0[2]	5%

[1]tons per consecutive twelve month period
[2]annual emission limit is based on 600 hrs/yr, and is included as part of the total 3,000 hrs/yr permitted for the entire ship loading operation.

[Permit Note: The ton/yr limits for EU 079 are based on 3,000 hrs per year for the ship loading project. The PM and hour limits for the ship loading baghouses are in addition to the limits for ship unloading stated in Subsection B.]

F.5. In order to ensure compliance with Specific Condition Nos. F.2, and F.4, the following reasonable precautions to prevent emissions of unconfined particulate matter at this facility shall apply:

(a) All bulk fine material handling operations related to the ship loading project shall be vented to the designated control device (baghouse) as designed.
(b) The control devices shall be in operation at all times when any material is being processed through the related handling systems.

[Rules 62-296.320(4)(c) and 62-4.070(3), F.A.C.]

F.6. The following work practice standards shall apply:

(a) Only one ship may be loaded at a time.
(b) All material shall be transferred pneumatically through enclosed pipes to minimize uncaptured emissions.
(c) Each shiphold receiving material must be vented to the corresponding baghouse to control particulate matter emissions.
(d) Use covers, wind shields and/or tarps at the shiphold as necessary during bulk fine material loading to meet the opacity standard.
(e) Any bulk fine material may be handled, as long as the material is handled in accordance with the permit and in compliance with the visible emission standards listed in Specific Condition No. F.4.
(f) If Scenario 2 is implemented, no more than 12 trucks can unload to a ship at one time.
(g) If flexible pipes are used to transfer collected material from the North and South cyclone separators (EU 044-45) to the ship, the pipes must be maintained in proper condition and free of holes, and the connections must be inspected to ensure no unconfined emissions are released to the atmosphere.

[Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.; and Construction Permit Nos. 0570018-012-AC and 017-AC]

F.7. In order to provide reasonable assurance of compliance with the standards from Specific Condition No. F.4 and to avoid overloading of an individual baghouse during ship loading, emissions from the ship during product loading under Scenario 2 shall not be vented to only a single dockside baghouse (Baghouse 44 or Baghouse 45). If one of those dockside baghouses are used, then it must be used in combination with the other dockside baghouse or Baghouse 27. If a portable dust collector is used under Scenario 2 rather than the permanent dockside baghouses, then the following requirements shall apply:

(a) The portable dust collector shall have a minimum airflow rate of 10,500 acfm.
(b) The portable dust collector shall have a maximum airflow rate of 39,000 acfm.
(c) The portable dust collector shall employ a pulse jet bag cleaning system and operate with a pressure drop across the system of 0-6" of water.
(d) Consistent with the Operation and Maintenance Plan for the permanent baghouses at the site, the permittee shall check and record the pressure drop and perform an instantaneous visual emissions determination on the portable baghouse each day that the baghouse is in operation.
(e) The permittee shall notify the EPC Compliance Section at least 15 days prior to use of a portable dust collector and provide specifications of the unit.
(f) If a generator is used to power the portable dust collector, the generator shall be diesel-fired and not to exceed 185 hp. The permittee shall also insure that the generator complies with all federal requirements (NSPS, NESHAP) related to operation of internal combustion engines.

[Rule 62-4.070(3), F.A.C.; and Construction Permit Nos. 0570018-012-AC and 017-AC]

<u>Test Methods and Procedures</u>

F.8. Test the ship loading emission unit in this subsection (EU 079) for visible emissions during the loading of bulk fine materials into ships annually during each federal fiscal year (October 1 – September 30). A visible emission test on each portable dust collector brought on-site for the ship loading operation shall also be performed during their initial use. Submit two copies of the test data to the Air Compliance Section of the Air Management Division of the Environmental Protection Commission of Hillsborough County (EPCHC) within 45 days of testing. The testing of EU 079 shall include observation of all baghouses connected to the ship to control emissions during ship loading. The test observations shall be made from the highest point of opacity. If any emissions are evident from the shiphold during the testing period, then separate visible emission tests shall be conducted on the shiphold to ensure compliance with the standard.
[Rules 62-297.310 F.A.C., and Rule 62-4.070(3), F.A.C.]

F.9. The test method for visible emissions shall be shall be EPA Method 9, incorporated and adopted by reference in Rule 62-297, F.A.C. The test method for particulate matter shall be EPA Methods 1, 2, 4, and 5, incorporated and adopted by reference in Rule 62-297, F.A.C. The minimum EPA Method 5 sample volume shall be 30 dry standard cubic feet. The permittee shall record and report the gas pressure differential across each baghouse during each required compliance test.
[Rules 62-296.711 and 62-213.440(1)(b), F.A.C.]

F.10. Testing of emissions shall be conducted with the sources operating at capacity. Capacity for ship loading operations is defined as 90-100% of the material handling rates in Specific Condition No. F.2. If it is impracticable to test at capacity, then the source 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 Environmental Protection Commission of Hillsborough County. Failure to submit the input rates and actual operating conditions, including the pressure differential across the baghouse, may invalidate the test. Ship loading shall be conducted as follows:

Scenario 1 –For ship loading, capacity shall be represented by all three delivery lines in operation simultaneously at their maximum process rate.

Scenario 2 – For ship loading, capacity shall be represented by 12 trucks loading into the ship simultaneously. If less than 12 trucks are loading during the test, then the source will be limited to 110% of that number of trucks at one time. Another test would be required to increase the number closer to capacity in the future if necessary.
[Rule 62-297.310(2), F.A.C.]

F.11. The required minimum period of observation for an EPA Method 9 compliance test shall be thirty (30) minutes.
[Rules 62-297.310(4)(a) and 62-4.070(3), F.A.C.]

F.12. A visible emissions test indicating no visible emissions (5 percent opacity) may be submitted in lieu of a particulate stack test for the ship loading operations, since they are equipped with baghouses. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Environmental Protection Commission of Hillsborough County pursuant to the authority granted under Rule 62-297.620(4), F.A.C. hereby allows the particulate testing to be waived in lieu of a visible emission standard not to exceed an opacity of 5%. If the EPC has reason to believe that the particulate weight emission standard is not being met, it shall require that compliance be demonstrated by Method 5 testing.

[Rules 62-296.711 and 62-297.310(7)(b), F.A.C.]

Continuous Monitoring Requirements

F.13. This emissions unit is subject to the CAM requirements contained in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*. Failure to adhere to the monitoring requirements specified in the CAM portion of the appendix does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Monitoring, Recordkeeping and Reporting Requirements

F.14. The permittee is subject to the Operation and Maintenance Plan requirements for particulate matter for all the emission units in this section controlled by a baghouse as specified in the attached combined *Operation and Maintenance (O&M) Plan/Compliance Assurance Monitoring (CAM) Plan*.
[Rules 62-296.700 and 62-213.440(1)(b), F.A.C.; and Construction Permit No. 0570018-017-AC]

F.15. The permittee shall maintain records to demonstrate compliance with the requirements of Specific Condition Nos. F.2 and F.4. The records shall include, as a minimum, the following information and shall be made available for inspection by the Environmental Protection Commission of Hillsborough County for at least five years:

(a) Daily (if operating)
  (1) Day, Month, Year
  (2) Pressure drop [inches H_2O] across each baghouse as required by the current Operation and Maintenance Plan
  (3) Result of each instantaneous visual emissions determination on each emissions unit with a baghouse as required by the current Operation and Maintenance Plan

(b) Monthly
  (1) Month, Year
  (2) The combined amount of bulk fine materials loaded into ships (EU 079) during the month [tons] and the most recent consecutive twelve month period [tons/12 months]
  (3) Hours of operation for each emission unit <u>during ship loading operations</u> (EU 079) during each month [hours/month] and the most recent consecutive twelve month period [tons/12 months]

[Rules 62-213.440(1)(b), 62-4.070(3) and 62-4.160(14), F.A.C.]