

PM emissions emitted from the processing of XP and EXP wallboards are higher than when processing regular wallboards. According to New NGC, Inc., this is due to the reaction of the additives in the XP and EXP wallboards in the kiln. The kiln is subject to Rule 62-296.712, F.A.C., which states “No owner or operator of a miscellaneous manufacturing process operation shall cause, permit, or allow emissions of particulate matter in excess of 0.03 gr/dscf or any visible emissions greater than 5 percent opacity”. New NGC, Inc. has requested to be limited to the 0.03 gr/dscf limitation rather than of the 5% opacity limit. Therefore, the kiln will be subject to the 0.03 gr/dscf standard specified in Rule 62-296.712(2), F.A.C., and the general 20% opacity standard specified in Rule 62-296.320(4)(b)1., F.A.C. There is no control device associated with the kiln.

Particulate matter (PM) emissions from the facility are controlled through the use of enclosures and baghouses. Emissions from the combustion of natural gas and fuel oil are limited through restrictions on the gas and fuel usage. In addition, hazardous air pollutants (HAPs), including formaldehyde and methanol, are emitted as a result of volatilization of the additives in the wallboard due to the high temperatures in the kiln.

Also, the facility has two (2) existing emergency Compression Ignition Internal Combustion Engine (CI ICE) generators. A diesel-fired, 166 HP Olympian, Model No. D100P1, can power the dry end of the plant in the event of a loss of electrical power. The second generator is a diesel-fired, 33 HP Olympian, Model No. D20P1, which can power the wet end of the plant. Both engines were manufactured prior to 2006. Therefore, the engines meet the definition of existing engines and are subject to 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, which is reflected in this permit. The engines are not subject to 40 CFR 60 Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines because they were manufactured prior to April 1, 2006.

The facility is subject to the PM RACT requirements of Rules 62-296.711 and 62-296.712, F.A.C., and Chapter 1-3.52, Rules of the EPC. In addition, portions of the facility (the four Imp Mills, the gypsum rock/BPG silo, the waste wallboard crusher, gypsum handling and storage, the raw material conveyor system, and the Imp Mill building) are subject to 40 CFR 60 Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants. However, the State and Local emissions standards are more stringent than the Federal emissions standards, therefore, the facility must comply with the State and Local emissions standards. In addition, the facility is exempt from 40 CFR 60 Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries based on the applicability determination pursuant to 40 CFR 60.730(b).

Based on our review, we recommend issuance of the permit as drafted.

LAW: 0571242-012-AC

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION
FOR

New NGC, Inc. dba National Gypsum Company

Hillsborough County

Construction Permit

Application Number

0571242-012-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

September 12, 2013

I. Project Description

A. Applicant:

John Corsi
VP, Manufacturing
National Gypsum Company
2001 Rexford Road
Charlotte, NC 28211

B. Engineer:

Omana A. Taylor, P.E.
ETG, Inc.
14948 Sunrise Dr. NE
Bainbridge Island, WA 98110

C. Project and Location:

This permit authorizes an increase in potential and allowable particulate matter (PM) emissions for EU No. 005 - Kiln. The allowable PM emissions will increase from 0.005 gr/dscf to 0.03 gr/dscf. This results in an increase in potential PM emissions from the kiln from 24.4 tons/year to 146.4 tons/year. Due to the increase in allowable emissions, the facility-wide potential PM emissions will be limited to 201.6 tons/year. The increase in allowable and potential emissions will result in the facility being classified as a TV facility.

The project has been assigned Source Classification Code 3-05-015-20 for Mineral Products – Drying Kiln. The Standard Industrial Code for the project is No. 32 for Stone, Clay, Glass and Concrete Products. The project is located at 12949 US Highway 41 South, Gibsonton, FL, 33534. UTM Coordinates of the location are 17- 364.70E and 3075.63N.

D. Process and Controls:

This permit authorizes an increase in potential and allowable emissions for EU No. 005 - Kiln. The allowable PM emissions will increase from 0.005 gr/dscf to 0.03 gr/dscf. This results in an increase of potential PM emissions from the kiln from 24.4 tons/year to 146.4 tons/year.

New NGC, Inc. is a gypsum wallboard manufacturing plant that utilizes a mixture of natural gypsum and synthetic gypsum that is produced in flue gas desulfurization scrubbers. New NGC, Inc. manufactures regular wallboard, XP wallboard containing silicone (polyhydrogenmethylsiloxane) as an additive, and EXP wallboard, which also contains the silicone additive and has a fiberglass mesh as a backing. By-product gypsum (BPG) and natural gypsum is delivered to the facility via truck. The trucks unload either into a hopper in a partially enclosed area next to the 45,000 ton storage dome (EU No. 011) or unload at the 100,000 ton outdoor gypsum storage pile area (EU No. 016). The outdoor storage pile is used as an overflow storage area. When the gypsum stored in the outdoor storage pile is needed in the dome storage building, the gypsum is either loaded into a truck using a front-end loader and trucked to the dome truck unloading hopper or is directly transferred by a front-end loader to the

dome truck unloading hopper.

From the hopper, material is gravity fed to a below grade conveyor belt. The material is conveyed to the top of the storage dome or sent directly to the Imp Mills using a series of fully enclosed conveyor belts (EU No. 014). If the material is directed to the top of the dome, it falls through a hole at the top of the dome onto a storage pile. When needed in production, gypsum from the pile inside the dome is loaded onto the below grade conveyor belt using front end loaders and is sent to the Imp Mills using the same conveying system described above. All transfer points on the conveyor system are fully enclosed.

Gypsum, either from the dome or the truck unloading area, is sent to a gypsum/BPG silo (EU No. 007) inside the Imp Mill Building. Particulate matter emissions from the silo are controlled by a Flex Kleen, Model No. 30/36-PXBL-49, 3,200 DSCFM baghouse which vents outside of the building. From the silo, gypsum is gravity fed onto a conveyor belt and conveyed into one of four Impact (Imp) Mill feed bins and then into one of four 33 ton/hour Imp Mills (EU Nos. 001 – 004). Each Imp Mill has a 30 MMBtu/hr burner to dry the gypsum and two 400 HP electric motor engines. The gypsum is dried, ground, and calcined in the Imp Mills to form calcium sulfate hemihydrate, also known as stucco. The stucco passes over a classifier where oversized material is returned to the Imp Mill. Each Imp Mill has an identical Flex Kleen, Model No. 20-WMC-540, 18,712 DSCFM baghouse to control particulate matter emissions. Each Imp Mill runs on natural gas or No. 2 fuel oil with a maximum sulfur content of 0.2% by weight as a backup.

A screw conveyor, bucket elevator, and air slide system conveys properly sized material into one of two storage bins (EU No. 006) where the stucco is stored before being conveyed into the production building. The transfer of material to and from the storage bins is controlled by a Flex Kleen, Model No. 120-WRTC-128, 6,600 DSCFM baghouse. Also in the Imp Mill building are two ball mills where additives and starch are crushed to produce an accelerant that is added to the wallboard mixture. Starch is shipped to the facility in railcars and is pneumatically pumped into a 120 ton storage silo (EU No. 010) outside of the Imp Mill Building. Particulate matter emissions from the starch silo are controlled by a Flex Kleen, Model No. 58-BYBC-36, 800 DSCFM baghouse.

In the production building, paper is rolled out onto a conveyor belt designated as the board former and heated to form the bottom of the wallboard. Various additives, including stucco, starch, boric acid, potassium sulfate, silicone (polyhydrogenmethylsiloxane), fiberglass, and retardants, depending on the type of board produced, are conveyed to a mixer and mixed with water. Enclosed conveyors transport the mixture from the mixer to the board former. The mixture is spread onto the heated paper and the wallboard is conveyed to the end of the production building. As the material moves along the conveyor, a chemical reaction causes the material to harden, or set up. At this point the wallboard is considered “green”, or uncured, wallboard.

At the end of the conveyor belt, the wallboard is cut and conveyed into a 750 foot, four zone, 12 row kiln (EU No. 005). The wallboard can be placed onto any of the twelve rows. The zones in the kiln are maintained at different temperatures. The temperature in Zones 1 and 2 is approximately 600°F, Zone 3 is approximately 450°F, and Zone 4 is approximately 350°F. To maintain the temperatures, Zones 1 and 2 each have one 60 MMBtu/hr burner, Zone 3 has one 30 MMBtu/hr burner, and Zone 4 has one 15 MMBtu/hr burner, for a total of 165 MMBtu/hr. Each zone has its own exhaust stack that could vent outdoors, however, most exhaust from each zone is captured and

sent to the next zone through an energy optimization system. The last zone, Zone 4, vents uncontrolled to the atmosphere. The kiln is fired on natural gas and No. 2 fuel oil with a maximum sulfur content of 0.2% by weight as a backup fuel. Two 50,000 gallon storage tanks store the No. 2 fuel oil.

Finished wallboard from the kiln is conveyed to one of three Board End Trim Units (BET units). The BET units cut off ½” from each end of the wallboard. Each BET (EU Nos. 008 and 009) unit has an identical Flex Kleen, Model No. 30-PXL-84, 6,600 DSCFM baghouse to control particulate matter emissions. Using an automated system, paper is glued to the ends of the boards and the boards are stacked for storage.

Waste and reject wallboard is either sent to the waste wallboard crusher or is used as risers. The electric powered waste wallboard crusher (EU No. 012) operates inside the storage dome. The waste wallboard is wet when it is put in the crusher so there are little emissions associated with the crusher. The crushed up waste is mixed with the natural and synthetic gypsum in the storage pile and used in production. The reject wallboard is also used to make risers. Risers (or spacers) are 3”x 3” blocks of reject wallboard that are cut, glued together, and then placed in between the layers of the finished wallboard that are stacked for storage. The PM emissions that are caused by cutting the waste wallboard for risers are vented back to the Imp Mills.

If the finished wallboard is to be shipped via railcar, it is wrapped with a shrink wrap type plastic prior to being loaded onto railcars. The shrink wrap machine is an EDL Wrapper, Model No. 40568, with a 1.0 MMBtu/hr thermal input rate. The shrink wrap machine qualifies as an insignificant activity in accordance with Rule 62-213.430(6)(b), F.A.C. because it has the potential to emit less than 5 tons per year of any regulated pollutant as long as the number of railcars shipped out of the facility remain below 2,930.

Also, the facility has two (2) existing emergency Compression Ignition Internal Combustion Engine (CI ICE) generators. A diesel-fired, 166 HP Olympian, Model No. D100P1, can power the dry end of the plant in the event of a loss of electrical power. The second generator is a diesel-fired, 33 HP Olympian, Model No. D20P1, which can power the wet end of the plant. Both engines were manufactured prior to 2006. Therefore, the engines meet the definition of existing engines and are subject to 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, which is reflected in this permit. The engines are not subject to 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines because they were manufactured prior to April 1, 2006.

There are other activities that are performed at this facility, which are sources of particulate matter, that vent inside the manufacturing building. These activities are considered to be insignificant activities pursuant to Rule 62-213.430(6)(b), F.A.C., because they vent inside the building and the PM emissions for these sources were estimated to be less than one tpy. These sources include the following activities:

Four Imp Mill Feed Bins	Starch Receiving Bin (Wet End)
Potash Receiving Bin (Raw Materials)	Vermiculite 54 Receiving Bin (Wet End)
Potash Receiving Bin (Wet End)	Vermiculite 54 Surge Bin (Raw Materials)
Potash Receiving Bin (Pulper)	L.P. Storage Bin A

Two Stucco Storage Bins	L.P. Storage Bin B
Stucco Handling (Imp Mill)	L.P. Silo (Imp Mill)
Starch Receiving Bin (Pulper)	Ball Mill A (Imp Mill)
Starch Storage Bin A (Imp Mill)	Ball Mill B (Imp Mill)
Starch Storage Bin B (Imp Mill)	BMA Receiving Bin (Wet End)
BMA Receiving Bin (Imp Mill)	Stucco Screw Conveyor above Pin Mixer (Wet End)

The kiln is subject to Rule 62-296.712, F.A.C., which states “No owner or operator of a miscellaneous manufacturing process operation shall cause, permit, or allow emissions of particulate matter in excess of 0.03 gr/dscf or any visible emissions greater than 5 percent opacity”. New NGC, Inc. has requested to be limited to the 0.03 gr/dscf limitation rather than of the 5% opacity limit. Therefore, the kiln will be subject to the 0.03 gr/dscf standard specified in Rule 62-296.712(2), F.A.C., and the general, 20% opacity standard specified in Rule 62-296.320(4)(b)1., F.A.C. There is no control device associated with the kiln.

The four Imp Mills, the gypsum/BPG silo, the waste wallboard crusher, the gypsum handling and storage, the raw material conveyor system, and the Imp Mill building are subject to 40 CFR 60, Subpart OOO (Nonmetallic Minerals Processing Plants). However, the opacity standard in Rules 62-296.711 - Materials Handling, Sizing, Screening, Crushing and Grinding Operations and 62-296.712 - Miscellaneous Manufacturing Process Operations, F.A.C., are more stringent than the opacity standards in 40 CFR 60 Subpart OOO. In addition, the facility has accepted grain loading limits that are more stringent than 40 CFR 60 Subpart OOO.

The truck unloading receiving hopper is exempt from 40 CFR 60 Subpart OOO per 40 CFR 60.672(d). The facility is subject to the PM RACT requirements of Rules 62-296.711 and 62-296.712, F.A.C., and Chapter 1-3.52, Rules of the EPC.

Also, the facility is exempt from 40 CFR 60 Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries based on the applicability determination pursuant to 40 CFR 60.730(b).

E. Application Information:

Received on: August 12, 2013
Information Requested: N/A
Application Complete: August 12, 2013

II. Rule Applicability

This project is subject to the pre-construction review requirements of Chapter 403, Florida Statutes, Chapters, 62-204, 62-210, 62-212, 62-296, and 62-297, Florida Administrative Code (F.A.C.) and Chapter 1-3 of the Rules of the Environmental Protection Commission of Hillsborough County.

This project is not subject to the requirements of Rule 62-212.400, Prevention of Significant Deterioration, F.A.C. or Rule 62-212.500, New Source Review for Non-attainment Areas, F.A.C., since the facility is a PSD minor source and this project does not result in a major modification.

This project is subject to the requirements of Rule 62-212.300, Sources Not Subject to Prevention of Significant Deterioration or Non-attainment Requirements, F.A.C., since the project is not exempt from the permit requirements of Rule 62-210.300, F.A.C.

This project will result in the facility being subject to the requirements of Rule 62-213., F.A.C. - Operation Permits for Major Sources of Air Pollution – since the PM emissions will be greater than 100 tons/year.

This project is subject to the requirements of Rule 62-296.320, General Pollutant Emission Limiting Standards, F.A.C., since the project is a potential source of odor, particulate matter, and volatile organic compound emissions.

This project is not subject to the requirements of Rule 62-296.401 through 62-296.417, Specific Emission Limiting and Performance Standards, F.A.C., since there is not an applicable source specific category for this source.

This project is not subject to the requirements of Rule 62-296.500, Reasonably Available Control Technology for VOCs, F.A.C., since there is not an applicable source specific category for this source.

This project is not subject to the requirements of Rule 62-296.600, Reasonably Available Control Technology for Lead, F.A.C., since there is not an applicable source specific category for this source.

This project is subject to the requirements of Rule 62-296.700, Reasonably Available Control Technology for Particulate Matter, F.A.C., since there are applicable source specific categories for this source, specifically, Rule 62-296.711, F.A.C. - Materials Handling, Sizing, Screening, Crushing and Grinding Operations and Rule 62-296.712, F.A.C. - Miscellaneous Manufacturing Process Operations.

This project is subject to the requirements of Rule 62-204.800, Federal Regulations Adopted by Reference, F.A.C., since there is an applicable source specific category for this source, specifically, 40 CFR 60 Subpart OOO -Standards of Performance for Nonmetallic Mineral Processing Plants.

This project is subject to the requirements of Chapter 84-446, Laws of Florida and Chapter 1-3, Rules of the Environmental Protection Commission of Hillsborough County.

III. Summary of Emissions

E.U. No.	Description	Potential PM (tpy)	Actual PM (tpy)	Increase in PM (tpy)	Allowable Emissions
001	Imp Mill No. 1	7.0	0.2	6.8	0.01 gr/dscf and 5% Opacity
002	Imp Mill No. 2	7.0	0.1	6.9	0.01 gr/dscf and 5% Opacity
003	Imp Mill No. 3	7.0	0.1	6.9	0.01 gr/dscf and 5% Opacity
004	Imp Mill No. 4	7.0	0.1	6.9	0.01 gr/dscf and 5% Opacity
005	Kiln	146.4	5.4	141.0	0.03 gr/dscf and 20% opacity
006	Stucco Handling	5.0	0.2	4.8	0.02 gr/dscf and 5% Opacity
007	Gypsum/FGD Silo	2.4	0.03	2.4	0.02 gr/dscf and 5% Opacity
008	Riser Maker (BET Unit No. 1)	2.5	0.1	2.4	0.01 gr/dscf and 5% Opacity
009	BET Unit Nos. 2 and 3	5.0	0.3	4.7	0.01 gr/dscf and 5% Opacity
010	Starch Silo	0.6	0.3	0.3	0.02 gr/dscf and 5% Opacity
011	Gypsum Handling & Storage	2.5	0.5	2.0	5% Opacity
012	Waste Wallboard Crusher	3.5	0.3	3.2	5% Opacity
014	Raw Material Conveyor System	2.5	0.8	1.7	5% Opacity
015	Imp Mill Building	--	--		0% Opacity
016	Outdoor Gypsum Storage Pile	3.0	2.8	0.2	5% Opacity
017	166 HP Olympian Emergency Engine	0.09	NA	0.09	--
018	33 HP Olympian Emergency Engine	0.02	NA	0.02	--
Total Emissions		201.6	11.1	190.5	

- Actual emissions are based on the average of 2011 and 2012 AOR data.
- Potential Emissions from EU Nos. 001 - 004 are based on a baghouse airflow rate of 18,712 dscfm, 8,760 hours/year operation, and an emission factor of 0.01 gr/dscf.
- Potential Emissions from EU No. 005 are based on a stack airflow rate of 130,000 dscfm, 8,760 hours/year operation, and an emission factor of 0.03 gr/dscf.

- Potential Emissions from EU No. 006 are based on a baghouse airflow rate of 6,600 dscfm, 8,760 hours/year operation, and an emission factor of 0.02 gr/dscf.
- Potential Emissions from EU No. 007 are based on a baghouse airflow rate of 3,200 dscfm, 8,760 hours/year operation, and an emission factor of 0.02 gr/dscf.
- Potential Emissions from EU No. 008 are based on a baghouse airflow rate of 6,600 dscfm, 8,760 hours/year operation, and an emission factor of 0.01 gr/dscf.
- Potential Emissions from the two baghouses associated with EU No. 009 are based on a baghouse airflow rate of 6,600 dscfm, 8,760 hours/year operation, and an emission factor of 0.02 gr/dscf per baghouse.
- Potential Emissions from EU No. 010 are based on a baghouse airflow rate of 800 dscfm, 8,760 hours/year operation, and an emission factor of 0.02 gr/dscf.
- Potential Emissions from EU No. 011 are based on the drop equation in AP 42 5th Edition, Chapter 13.2.4 - Aggregate Handling and Storage Piles with a maximum of two transfer points, a moisture content of 0.25, and a control efficiency of 85% for the dome.
- Potential Emissions from EU No. 012 are based on a throughput of 76,000 tons/year and an emission factor of 0.62 lb PM/ton from AP 42 5th Edition, Chapter 11-17 - Lime Manufacturing.
- Potential Emissions from EU No. 014 are based on an emission factor of 0.003 lb PM/ton from AP 42 5th Edition, Chapter 11-19.2 - Crushed Stone Processing and Pulverized Mineral Processing, a throughput of 8760,000 tons/year, a maximum of four transfer points, and a control efficiency of 50% for enclosures.
- Potential Emissions from EU No. 016 are based on an emission factor of 0.067 lb PM/ton which is derived from a stack test performed at New NGC's Port Tampa facility in 2005, a maximum of three transfer points, and a 70% control efficiency for a water spray system.
- Potential Emissions from EU No. 017 and 018 are based on the horsepower of the engines, 500 hours/year operation per engine, and emission factors from AP 42 5th Edition, Chapter 3.3 - Gasoline and Diesel Industrial Engines. In addition, EU Nos. 017 and 018 were previously determined to be exempt from permitting. Therefore, there are no actual emissions were reported for 2011 and 2012.

Criteria Pollutants

E.U. No.	Description	Potential NO _x (tpy)	Actual NO _x (TPY)	Increase in NO _x (tpy)	Potential SO ₂ (tpy)	Actual SO ₂ (TPY)	Increase in SO ₂ (tpy)
001	Imp Mill No. 1	15.5	0.4	15.1	10.6	0.3	10.3
002	Imp Mill No. 2	15.5	0.4	15.1	10.6	0.3	10.3
003	Imp Mill No. 3	15.5	0.4	15.1	10.6	0.4	10.2
004	Imp Mill No. 4	15.5	0.4	15.1	10.6	0.3	10.3
005	Kiln	34.3	4.0	30.3	41.3	1.1	40.2
017	166 HP Emergency Engine	1.3	NA	1.3	0.09	NA	0.09

E.U. No.	Description	Potential NO _x (tpy)	Actual NO _x (TPY)	Increase in NO _x (tpy)	Potential SO ₂ (tpy)	Actual SO ₂ (TPY)	Increase in SO ₂ (tpy)
018	33 HP Emergency Engine	0.3	NA	0.3	0.02	NA	0.02
	Total	97.9	5.6	92.3	83.7	2.3	81.4

- Actual emissions are based on the average of 2011 and 2012 AOR data.
- Potential Emissions for EU Nos. 001-004 are based on stack test data, emission factors from AP 42 5th Edition Chapters 1.3 and 1.4., operating 3,000 hours/year on fuel oil, and operating 5,760 hours/year on natural gas with a heating value of 1,000 Btu/scf.
- Potential Emissions for EU No. 005 are based on stack test data, manufacturer's information, emission factors from AP 42 5th Edition Chapters 1.3 and 1.4., operating 2,400 hours/year on fuel oil, and operating 6,360 hours/year on natural gas with a heating value of 1,000 Btu/scf.
- Potential Emissions from EU No. 017 and 018 are based on the horsepower of the engines, 500 hours/year operation per engine, and emission factors from AP 42 5th Edition, Chapter 3.1 - Gasoline and Diesel Industrial Engines. In addition, EU Nos. 017 and 018 were previously determined to be exempt from permitting. Therefore, there are no actual emissions were reported for 2011 and 2012.

E.U. No.	Description	Potential CO (TPY)	Actual CO (tpy)	Increase in CO (tpy)	Potential VOC (tpy)	Actual VOC (tpy)	Increase in VOC (tpy)
001	Imp Mill No. 1	8.9	3.8	5.1	0.6	0.3	0.3
002	Imp Mill No. 2	8.9	3.9	5.0	0.6	0.3	0.3
003	Imp Mill No. 3	8.9	3.9	5.0	0.6	0.3	0.3
004	Imp Mill No. 4	8.9	3.9	5.0	0.1	0.3	0.3
005	Kiln	49.2	19.9	29.3	41.1	24.3	16.8
017	166 HP Emergency Engine	0.3	NA	0.3	0.1	NA	0.1
018	33 HP Emergency Engine	0.6	NA	0.6	0.02	NA	0.02
	Total	76.2	35.3	40.9	43.1	25.3	17.8

- See above table for emission calculation explanation.
- VOC emissions from EU No. 005 are based on a stack test performed at the New NGC plant in Tampa, Florida, which includes VOC emissions from the combustion of natural gas, and operating

2,400 hours/year on fuel oil.

HAP Emissions

E.U. No.	Description	Potential Formaldehyde (tpy)	Actual Formaldehyde (tpy)	Potential Methanol (tpy)	Actual Methanol (tpy)
005	Kiln	8.8	0.03	2.4	0
	Total	9.9	0.03	2.4	0

- The Kiln emits HAP emissions associated with the additives on the XP and EXP wallboards, of which formaldehyde and methanol are the two highest HAPs emitted from this process.
- Potential formaldehyde emissions were calculated based on the results of a stack test performed at the New NGC plant in Tampa, Florida. The potential formaldehyde emissions from the manufacturing of EXP wallboards were calculated based on the results of a stack test performed at the New NGC plant in Wilmington, NC. The formaldehyde emission factors for each type of board represent the worst case result of each stack test.
- Potential methanol emissions from the manufacturing of XP, EXP, and Regular wallboard are based on the results of a stack test performed at the New NGC plant in Tampa, Florida. A stack test for methanol was not performed at the Wilmington, NC facility.

IV. Conclusions:

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C., and Chapter 1-3, Rules of the Commission.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204, 62-210, 62-212, 62-296, and 62-297, F.A.C.

V. Proposed Agency Action:

Pursuant to Section 403.087, Florida Statutes and Rule 62-4.070, Florida Administrative Code the Environmental Protection Commission of Hillsborough County hereby gives notice of its intent to issue a permit for construction of the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).

CERTIFIED MAIL

In the Matter of an
Application for Permit by:

John Corsi
VP, Manufacturing
National Gypsum Company
2001 Rexford Road
Charlotte, NC 28211

File No.: 0571242-012-AC
County: Hillsborough

INTENT TO ISSUE

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP) gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant, National Gypsum Co., applied on August 12, 2013 to the EPC for a construction permit to increase the potential particulate matter emissions from the Kiln. The increase in emissions will result in the facility being classified as a TV source. The facility is located at 12949 US Hwy. 41, Gibsonton, Hillsborough County, FL, 33534.

The EPC has permitting jurisdiction under Chapter 403 Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4 and 62-210. The project is not exempt from permitting procedures. The EPC has determined that an air pollution construction permit is required to commence or continue operations at the described facility.

The EPC intends to issue this permit based on the belief that reasonable assurances have been provided to indicate that operation of the source will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 and 62-4. Pursuant to Section 403.815 and 403.0872, F.S. and Rules 62-103.150 and 62-210.350(3), F.A.C., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice shall be published one time as soon as possible, in the legal advertisement section of a

newspaper of general circulation in the area affected. For the purpose of this rule, "publication in a newspaper of general circulation in the area affected" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the EPC at the address or telephone number listed below. **The applicant shall provide proof of publication to the EPC, Air Permitting Section, at 3629 Queen Palm Drive, Tampa, Florida 33619 (Phone 813-627-2600 - FAX 813-627-2660) within 7 (seven) days of publication.** Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit pursuant to Rule 62-103.150(6), F.A.C.

The EPC will issue the final permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Section 120.569 and 120.57 F.S. before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S.; or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the EPC's determination;
- (c) A statement of how and when the petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC's proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition, this order will not be effective until further order of the EPC.

In addition to the above, a person subject to regulation has a right to apply to the Department of Environmental Protection for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, FL 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner,
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any,
- (c) Each rule or portion of a rule from which a variance or waiver is requested,
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above,
- (e) The type of action requested,

- (f) The specific facts that would justify a variance or waiver for the petitioner,
- (g) The reason by the variance or waiver would serve the purposes of the underlying statute (implemented by the rule), and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of the those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of United States Environmental Protection Agency and by any person under the Clean Air Act unless and until the Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the EPC that are relevant to the permit decision. Interested persons may contact Diana M. Lee, P.E., at the above address or call (813) 627-2600, for additional information.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Dr., Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

Executed in Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

New NGC, Inc. dba National Gypsum Co.
Charlotte, NC 28211

Page 5 of 5

cc: Florida Department of Environmental Protection (via email)
Omana A. Taylor, P.E. – ETC, Inc. (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

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

Clerk

Date

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
NOTICE OF INTENT TO ISSUE PERMIT

The Environmental Protection Commission of Hillsborough County (EPC), as delegated by the Florida Department of Environmental Protection (DEP), gives notice of its intent to issue an air pollution Permit No. 0571242-012-AC to National Gypsum Co., a gypsum wallboard manufacturing plant. The applicant applied on August 12, 2013 to the EPC for a construction permit to increase the potential particulate matter emissions from the Kiln process. The increase in emissions will result in the facility being classified as a major source of particulate matter emissions. The facility is located at 12949 US Hwy. 41, Gibsonton, Hillsborough County, FL, 33534.

A Best Available Control Technology (BACT) determination was not required.

The EPC will issue the Final permit with the conditions of the DRAFT permit unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. before the deadline for filing a petition. The procedures for petitioning for hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 (fourteen) days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S. must be filed within 14 (fourteen) days of publication of the public notice or within 14 (fourteen) days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), however, any person who asked the EPC for notice of agency action may file a petition within 14 (fourteen) days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the F.A.C.

A petition that disputes the material facts on which the EPC's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number if known;
- (b) The name, address, and telephone number of the petitioner, and the name, address, and telephone number of each petitioner's representative, if any, which shall be the address for service purposes during the course of the proceedings; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the EPC action;

(d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;

(e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the EPC proposed action;

(f) A statement of specific rules or statutes the petitioner contends requires reversal or modification of the EPC's proposed action; and

(g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the EPC to take with respect to the EPC's proposed action.

A petition that does not dispute the material facts upon which the EPC's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above as required by Rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the EPC's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the EPC on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation under section 120.573, F.S. is not available in this proceeding.

This action is final and effective on the date filed with the Clerk of the EPC unless a petition is filed in accordance with above. Upon the timely filing of a petition this order will not be effective until further order of the EPC.

Any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes, by filing a notice of appeal under rule 9.110 of the Florida rules of Appellate Procedure with the EPC's Legal Office at 3629 Queen Palm Drive, Tampa, Florida 33619 and with the clerk of the Department of Environmental Protection in the Office of General Counsel, Mail Station 35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000, and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within thirty days after this order is filed with the clerk of the Department.

The complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at the Environmental Protection Commission of Hillsborough County, 3629 Queen Palm Drive, Tampa, Florida 33619. The complete project file includes the proposed Permit, the application, and the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact Diana M. Lee, P.E., at the above address, or call 813-627-2600, for additional information. Any written comments filed shall be available for public inspection. If written comments received result in a significant change in the proposed agency action, the EPC shall revise the proposed permit and require, if applicable, another Public Notice.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

John Corsi
Vice President, Manufacturing
National Gypsum Co. dba New NGC, Inc.
2001 Rexford Road
Charlotte, NC 28211

Re: Hillsborough County - AP

Dear Mr. Corsi:

Enclosed is Permit Number 0571242-012-AC to increase the potential and allowable particulate matter emissions from the Kiln. This permit also changes the status of the facility from a Synthetic non-Title V source to a Title V source, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

National Gypsum Co.
Charlotte, NC 28211

Page 2 of 2

cc: Florida Department of Environmental Protection – via email
Omana Korah P.E. – Environmental Technologies Group, Inc.

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

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

Clerk

Date

PERMITTEE:
National Gypsum Co. dba New NGC, Inc.
2001 Rexford Road
Charlotte, NC 28211

PERMIT/CERTIFICATION
Permit No.: 0571242-012-AC
County: Hillsborough
Expiration Date: December 1, 2014
Project: Kiln Modification – Major Source Status

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the EPC and made a part of hereof and specifically described as follows:

This permit authorizes an increase in potential and allowable emissions for EU No. 005 - Kiln. The allowable PM emissions will increase from 0.005 gr/dscf to 0.03 gr/dscf. This results in an increase of potential PM emissions from the kiln from 24.4 tons/year to 146.4 tons/year.

New NGC, Inc. is a gypsum wallboard manufacturing plant that utilizes a mixture of natural gypsum and synthetic gypsum that is produced in flue gas desulfurization scrubbers. New NGC, Inc. manufactures regular wallboard, XP wallboard containing silicone (polyhydrogenmethylsiloxane) as an additive, and EXP wallboard, which also contains the silicone additive and has a fiberglass mesh as a backing. By-product gypsum (BPG) and natural gypsum is delivered to the facility via truck. The trucks unload either into a hopper in a partially enclosed area next to the 45,000 ton storage dome (EU No. 011) or unload at the 100,000 ton outdoor gypsum storage pile area (EU No. 016). The outdoor storage pile is used as an overflow storage area. When the gypsum stored in the outdoor storage pile is needed in the dome storage building, the gypsum is either loaded into a truck using a front-end loader and trucked to the dome truck unloading hopper or is directly transferred by a front-end loader to the dome truck unloading hopper.

From the hopper, material is gravity fed to a below grade conveyor belt. The material is conveyed to the top of the storage dome or sent directly to the Imp Mills using a series of fully enclosed conveyor belts (EU No. 014). If the material is directed to the top of the dome, it falls through a hole at the top of the dome onto a storage pile. When needed in production, gypsum from the pile inside the dome is loaded onto the below grade conveyor belt using front end loaders and is sent to the Imp Mills using the same conveying system described above. All transfer points on the conveyor system are fully enclosed.

Gypsum, either from the dome or the truck unloading area, is sent to a gypsum/BPG silo (EU No. 007) inside the Imp Mill Building. Particulate matter emissions from the silo are controlled by a Flex Kleen, Model No. 30/36-PXBL-49, 3,200 DSCFM baghouse which vents outside of the building. From the silo, gypsum is gravity fed onto a conveyor belt and conveyed into one of four Impact (Imp) Mill feed bins and then into one of four 33 ton/hour Imp Mills (EU Nos. 001 – 004). Each Imp Mill has a 30 MMBtu/hr burner to dry the gypsum and two 400 HP electric motor engines. The gypsum is dried, ground, and calcined in the Imp Mills to form calcium sulfate hemihydrate, also known as stucco. The stucco passes over a classifier where oversized material is returned to the Imp Mill. Each Imp Mill has an identical Flex Kleen, Model No. 20-WMC-540, 18,712 DSCFM baghouse to control particulate matter emissions. Each Imp Mill runs on natural gas or No. 2 fuel oil with a maximum sulfur content of 0.2% by weight as a backup.

A screw conveyor, bucket elevator, and air slide system conveys properly sized material into one of two storage bins (EU No. 006) where the stucco is stored before being conveyed into the production building. The transfer of material to and from the storage bins is controlled by a Flex Kleen, Model No. 120-WRTC-128, 6,600 DSCFM baghouse. Also in the Imp Mill building are two ball mills where additives and starch are crushed to produce an accelerant that is added to the wallboard mixture. Starch is shipped to the facility in railcars and is pneumatically pumped into a 120 ton storage silo (EU No. 010) outside of the Imp Mill Building. Particulate matter emissions from the starch silo are controlled by a Flex Kleen, Model No. 58-BYBC-36, 800 DSCFM baghouse.

In the production building, paper is rolled out onto a conveyor belt designated as the board former and heated to form the bottom of the wallboard. Various additives, including stucco, starch, boric acid, potassium sulfate, silicone (polyhydrogenmethylsiloxane), fiberglass, and retardants, depending on the type of board produced, are conveyed to a mixer and mixed with water. Enclosed conveyors transport the mixture from the mixer to the board former. The mixture is spread onto the heated paper and the wallboard is conveyed to the end of the production building. As the material moves along the conveyor, a chemical reaction causes the material to harden, or set up. At this point the wallboard is considered “green”, or uncured, wallboard.

At the end of the conveyor belt, the wallboard is cut and conveyed into a 750 foot, four zone, 12 row kiln (EU No. 005). The wallboard can be placed onto any of the twelve rows. The zones in the kiln are maintained at different temperatures. The temperature in Zones 1 and 2 is approximately 600°F, Zone 3 is approximately 450°F, and Zone 4 is approximately 350°F. To maintain the temperatures, Zones 1 and 2 each have one 60 MMBtu/hr burner, Zone 3 has one 30 MMBtu/hr burner, and Zone 4 has one 15 MMBtu/hr burner, for a total of 165 MMBtu/hr. Each zone has its own exhaust stack that could vent outdoors, however, most exhaust from each zone is captured and sent to the next zone through an energy optimization system. The last zone, Zone 4, vents to the outdoors. The kiln is fired on natural gas and No. 2 fuel oil with a maximum sulfur content of 0.2% by weight as a backup fuel. Two 50,000 gallon storage tanks store the No. 2 fuel oil.

Finished wallboard from the kiln is conveyed to one of three Board End Trim Units (BET units). The BET units cut off ½” from each end of the wallboard. Each BET (EU Nos. 008 and 009) unit has an

identical Flex Kleen, Model No. 30-PXL-84, 6,600 DSCFM baghouse to control particulate matter emissions. Using an automated system, paper is glued to the ends of the boards and the boards are stacked for storage.

Waste and reject wallboard is either sent to the waste wallboard crusher or is used as risers. The electric powered waste wallboard crusher (EU No. 012) operates inside the storage dome. The waste wallboard is wet when it is put in the crusher so there are little emissions associated with the crusher. The crushed up waste is mixed with the natural and synthetic gypsum in the storage pile and used in production. The reject wallboard is also used to make risers. Risers (or spacers) are 3"x 3" blocks of reject wallboard that are cut, glued together, and then placed in between the layers of the finished wallboard that are stacked for storage. The PM emissions that are caused by cutting the waste wallboard for risers are vented back to the Imp Mills.

If the finished wallboard is to be shipped via railcar, it is wrapped with a shrink wrap type plastic prior to being loaded onto railcars. The shrink wrap machine is an EDL Wrapper, Model No. 40568, with a 1.0 MMBtu/hr thermal input rate. The shrink wrap machine qualifies as an insignificant activity in accordance with Rule 62-213.430(6)(b), F.A.C. because it has the potential to emit less than 5 tons per year of any regulated pollutant as long as the number of railcars shipped out of the facility remain below 2,930.

Also at the facility are two (2) existing emergency Compression Ignition Internal Combustion Engine (CI ICE) generators. A diesel-fired, 166 HP Olympian, Model No. D100P1, can power the dry end of the plant in the event of a loss of electrical power. The second generator is a diesel-fired, 33 HP Olympian, Model No. D20P1, which can power the wet end of the plant. Both engines were manufactured prior to before June 12, 2006. Therefore, the engines meet the definition of existing engines and are subject to 40 CFR 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

There are other activities that are performed at this facility, which are sources of particulate matter, that vent inside the manufacturing building. These activities are considered to be insignificant activities pursuant to Rule 62-213.430(6)(b), F.A.C., because they vent inside the building and the PM emissions for these sources were estimated to be less than one tpy. These sources include the following activities:

- | | |
|--------------------------------------|---|
| Four Imp Mill Feed Bins | Starch Receiving Bin (Wet End) |
| Potash Receiving Bin (Raw Materials) | Vermiculite 54 Receiving Bin (Wet End) |
| Potash Receiving Bin (Wet End) | Vermiculite 54 Surge Bin (Raw Materials) |
| Potash Receiving Bin (Pulper) | L.P. Storage Bin A |
| Two Stucco Storage Bins | L.P. Storage Bin B |
| Stucco Handling (Imp Mill) | L.P. Silo (Imp Mill) |
| Starch Receiving Bin (Pulper) | Ball Mill A (Imp Mill) |
| Starch Storage Bin A (Imp Mill) | Ball Mill B (Imp Mill) |
| Starch Storage Bin B (Imp Mill) | BMA Receiving Bin (Wet End) |
| BMA Receiving Bin (Imp Mill) | Stucco Screw Conveyor above Pin Mixer (Wet End) |

Location: 12949 US Highway 41 South, Gibsonton, FL 33534

UTM: 17-364.7 E and 3075.6 N NEDS NO: 1242

Emission Unit Nos.:

- 001 Imp Mill No. 1
- 002 Imp Mill No. 2
- 003 Imp Mill No. 3
- 004 Imp Mill No. 4
- 005 Kiln
- 006 Stucco Handling
- 007 Gypsum Rock / BPG Silo
- 008 Board End Trim Unit No. 1
- 009 Board End Trim Units No. 2 and 3
 - Emission Point No. 1: Board End Trim Unit No. 2
 - Emission Point No. 2: Board End Trim Unit No. 3
- 010 Starch Silo
- 011 Gypsum Storage and Handling
- 012 Waste Wallboard Crusher
- 014 Raw Material Transfer System
- 015 Imp Mill Building
- 016 Outdoor Gypsum Storage Pile Area

References Permit Nos.: 0571242-007-AC, -008-AC, and -009-AC

Replaces Permit No.: NA

PERMITTEE:
New NGC, Inc.

PERMIT/CERTIFICATION No.: 0571242-012-AC
PROJECT: Kiln Modification – Major Source Status

SPECIFIC CONDITIONS:

Facility wide conditions

FW.1. A part of this permit is the attached General Conditions. [Rule 62-4.160, F.A.C.]

FW.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.]

FW.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.]

FW.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(2), F.A.C.]

FW.5. As requested by the permittee, the facility wide particulate matter emissions shall not exceed 201.6 tons per twelve consecutive month period. [Rules 62-212.300, 62-210.200, and 62-4.070(3), F.A.C.]

FW.6. The Hazardous Air Pollutant (HAP), as defined in Rule 62-210.200 F.A.C., emissions shall be less than 10 tons in any twelve consecutive month period for any individual HAP and less than 25 tons in any 12 consecutive month period for any combination of HAP's. [Rules 62-212.300, 62-210.200, and 62-4.070(3), F.A.C. and Permit No. 0571242-007-AC]

FW.7. In order to ensure compliance with Specific Condition No. FW.5. and FW.6., the following limitations and restrictions shall apply per any twelve consecutive month period: [Rules 62-4.070(3) and 62-210.200 – Definitions, Potential to Emit, F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

- A) The maximum combined amount of byproduct gypsum and natural gypsum received and processed at the facility shall not exceed 876,000 tons.
- B) Of the 876,000 tons of byproduct gypsum and natural gypsum received by the facility, no more than 100,000 tons shall be stored in the outdoor gypsum storage pile.
- C) The maximum finished board production rate shall not exceed 876,000 tons of board.
- D) Of the 876,000 tons of board produced, no more than 70,000 tons shall be EXP board and no more than 160,000 tons shall be XP board.

FW.8. The permittee shall operate and maintain a measuring device to determine the air pressure differential across each baghouse and the clean air supply pressure to the baghouse within 10 percent accuracy. [Rule 62-297.310(5)(b), F.A.C. and Permit No. 0571242-007-AC]

PERMITTEE:
New NGC, Inc.

PERMIT/CERTIFICATION No.: 0571242-012-AC
PROJECT: Kiln Modification – Major Source Status

SPECIFIC CONDITIONS:

FW.9. [Revised]

FW.10. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following: [Rule 62-296.320(4)(c), F.A.C. and Permit Nos. 0571242-007-AC and -009-AC]

- A) All by-product gypsum and natural gypsum shall be adequately wetted as necessary during transporting, unloading, storage, and handling to ensure compliance with the opacity standards.
- B) A dedicated water spray system shall be available at all times during material transfer/handling to wet the by-product and natural gypsum as necessary.
- C) Particulate matter shall be removed from the facility roadways with a wet vacuum or other equivalent suitable means, as necessary, to control re-entrainment particulate matter due to vehicular traffic.
- D) A truck tire wash shall be used to minimize the tracking of particulate matter onto facility and public roadways.
- E) Landscaping or planting of vegetation.
- F) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, open stock piles and similar activities as needed.

FW.11. The permittee shall not circumvent the provisions of an applicable emission limitation by increasing the volume of gas in any exhaust or group of exhausts for the purpose of reducing the stack gas concentration. This includes allowing dilution air to enter the system through leaks, open vents, or similar means. [Rule 62-296.700(5), F.A.C.]

FW.12. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the EPCHC for longer duration. [Rule 62-210.700(1), F.A.C.]

FW.13. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. [Rule 62-210.700(4), F.A.C.]

FW.14. In case of excess emissions resulting from malfunctions, the owner or operator shall notify the EPC in accordance with Rule 62-4.130, F.A.C. A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the EPC. [Rules 62-4.130 and 62-4.070(3), F.A.C.]

PERMITTEE:
New NGC, Inc.

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FW.15. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 30 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. [40 CFR 60.8(d) and Rule 62-297.310(7)(a)9., F.A.C.]

FW.16. 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.]

FW.17. The permittee shall comply with the following requirements: [Rule 62-204.800, F.A.C.]

A) The permittee shall furnish the EPC written notification as follows: [40 CFR 60.7(a)(4) and (6)]

1. A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The EPC may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4)]

2. A notification of the anticipated date for conducting the opacity observations required by this permit. The notification shall be postmarked not less than 30 days prior to such date.

B) Any owner or operator subject to the provisions of this part shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR 60.7(b)]

C) Any owner or operator subject to the provisions of this part shall maintain a file of all measurements, including monitoring device, and performance testing measurements; adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records. [40 CFR 60.7(f)]

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- D) The opacity standards set forth in this permit shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard. [40 CFR 60.11(c)]
- F) At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]
- G) No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12]

FW.18. When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the EPC. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

FW.19. 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(205), F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.
- C) The use of any materials that may cause an increase in potential emissions.

FW.20. The permittee shall 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

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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.]

FW.21. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Air 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.]

FW.22. A minimum of two copies of an air operating permit application shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of compliance testing of the Kiln (EU No. 005) or at least 180 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

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Section A. The following specific conditions apply to the following emission units:

EU No.	Description
001	Imp Mill No. 1
002	Imp Mill No. 2
003	Imp Mill No. 3
004	Imp Mill No. 4

A.1. As requested by the permittee, in order to limit the potential to emit, the permittee shall not exceed the material and air flow rate limitations listed in the following table. [Rule 62-4.070(3), F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

EU No.	Emission Unit	Material Input	Maximum ACFM	Maximum DSCFM	Thermal Input (MMBtu/hr)
001	Imp Mill No. 1	33 tons/hour	38,400	18,712	30
002	Imp Mill No. 2	33 tons/hour	38,400	18,712	30
003	Imp Mill No. 3	33 tons/hour	38,400	18,712	30
004	Imp Mill No. 4	33 tons/hour	38,400	18,712	30

A.2. As requested by the permittee, the maximum allowable and potential particulate matter emissions shall not exceed the following per twelve consecutive month period: [Rules 62-4.070(3) and 62-296.711(b), F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

E.U. No.	Description	gr/dscf	PM (tpy)	SO ₂ (tpy)	Opacity (%)
001	Imp Mill No. 1	0.010	7.0	10.6	5
002	Imp Mill No. 2	0.010	7.0	10.6	5
003	Imp Mill No. 3	0.010	7.0	10.6	5
004	Imp Mill No. 4	0.010	7.0	10.6	5

A.3. In order to limit the potential to emit, the following limitations shall apply: [Rules 62-4.070(3) and 62-210.200 – Definitions, Potential to Emit, F.A.C. and Permit No. 0571242-007-AC]

- A) Each Imp Mill shall not be operated for more than 3,000 hours during any 12 consecutive month period while firing No. 2 fuel oil.
- B) Each Imp Mill shall not use more than 656,934 gallons of No. 2 fuel oil during any 12

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consecutive month period.

- C) The Imp Mills are each authorized to operate 8,760 hours during any 12 consecutive month period while firing natural gas
- D) Only No. 2 fuel oil, with a sulfur content not to exceed 0.2% by weight, shall be used as backup fuel.

A.4. Test EU Nos. 001 - 004 once per federal fiscal year (October 1 through September 30) for the pollutants indicated below and as specified in Specific Condition No. A.5. Submit two copies of the test data to the Air Compliance Section of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Test procedures shall be consistent with the requirements of 40 CFR 60 and Rule 62-297, F.A.C. For the Imp Mills, the PM testing shall be completed on one single Imp Mill each year in one of the scenarios in A) or B) below that is representative of the previous 12-months for the Imp Mil. [Rules 62-297.310(4) and (7) and 62-4.070(3), F.A.C. and Permit Nos. 0571242-007-AC and -008-AC]

- A) A blend of natural gypsum and by-product gypsum that represents normal plant operation while firing natural gas
- B) A blend of natural gypsum and by-product gypsum that represents normal plant operation while firing fuel oil
- C)

E.U. No.	Emission Unit Description	Opacity	PM
001	Imp Mill No. 1	X	X
002	Imp Mill No. 2	X	
003	Imp Mill No. 3	X	
004	Imp Mill No. 4	X	

- D) A minimum 12-minute Method 9 observation is required for any dust collector, in operation on a daily basis, with a pressure differential reading greater than 6 inches water, to confirm compliance with the visible emission standard.

A.5. As required in Specific Condition No. A.4., the permittee shall test the Imp Mills so that each Imp Mill is tested at least once during a five year cycle. The following additional requirements are set forth for the Imp Mills test: [Rules 62-297.310(5)(a) and (b), 62-297.310(7), and 62-4.070(3), F.A.C. and Permit No. 0571242-007-AC]

- A) Each year, the date of the compliance test will be set by facility personnel, but it should be

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performed ± 30 days from the last anniversary test date.

- B) Notification of the scheduled date shall be provided at least 30 days in advance.
- C) The test shall be conducted and submitted in accordance with Specific Condition No. A.4.
- D) One Imp Mill should be tested with a blend of natural gypsum and by-product gypsum while firing fuel oil, at least once in the five year permit cycle.
- E) The duration of the EPA Method 9 tests shall be at least 30 minutes and shall be conducted concurrently with the Method 5 test.

A.6. Testing of emissions shall be conducted with each source operating at capacity. Capacity is defined as 90-100% of the rated capacity of processing 33 tons/hour. 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 EPC. Failure to submit the material input rates and actual operating conditions, such as pressure drop across the baghouse, thermal input rates, and material throughput rates may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

A.7. Compliance with the emission limitations of Specific Condition Nos A.1. and A.2. shall be determine using EPA Methods 1, 2, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

A.8. Compliance with Specific Condition No. A.3.D) shall be demonstrated by either of the following: [Rules 62-297.440 and 62-4.070(3), F.A.C.]

- A) A Certificate of Fuel Oil Analysis* from a fuel oil vendor of each shipment of fuel oil received.
- B) Certificate of Fuel Oil Analysis* for a fuel oil sample taken by the permittee from each shipment of fuel oil received.

*According to the most current version of ASTM Method D-396 or D-4294.

A.9. In order to demonstrate compliance with Specific Condition Nos. A.1., A.2., and A.3., the permittee shall maintain a daily recordkeeping system for the most recent five year period. The records shall be maintained onsite and shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal agency upon request. [Rules 62-4.070(3) and 62-213.400(b)2.b., F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

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- A) Day, Month
- B) Monthly amount of natural gas used for each Imp Mill (thousand cubic feet)
- C) The hours each Imp Mill operated while firing on natural gas
- D) Monthly amount of fuel oil used for each Imp Mill (gallons)
- E) The hours each Imp Mill operated while firing on fuel oil
- F) Monthly material throughput for each Imp Mill
- G) Rolling 12 consecutive month totals of B) through F) above.
- H) Fuel sulfur analyses as required in Specific Condition No. A.8.
- I) Inspection records as required in the Operation and Maintenance Plan for Particulate Control in Appendix A and Specific Condition No. FW.9.

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SPECIFIC CONDITIONS:

Section B. The following specific conditions apply to the following emission units:

EU No.	Description
005	Kiln

B.1. As requested by the permittee, in order to limit the potential to emit, the permittee shall not exceed the following emission and air flow rate limitations. [Rule 62-4.070(3), F.A.C.]

grains/dscf	PM (tpy)	SO ₂ (tpy)	Maximum ACFM	Maximum DSCFM	Thermal Input (MMBtu/hr)
0.03	146.4	41.3	186,000	130,000	165

B.2. In order to limit the potential to emit, the following limitations shall apply: [Rules 62-4.070(3) and 62-210.200 – Definitions, Potential to Emit, F.A.C. and Permit No. 0571242-007-AC]

- A) The Kiln shall not be operated for more than 2,400 hours during any 12 consecutive month period while firing No. 2 fuel oil.
- B) The Kiln shall not use more than 2,890,511 gallons of No. 2 fuel oil during any 12 consecutive month period.
- C) The Kiln is authorized to operate 8,760 hours during any 12 consecutive month period while firing natural gas.
- D) Only No. 2 fuel oil, with a sulfur content not to exceed 0.2% by weight, shall be used as backup fuel.

B.3. The following limitations shall apply: [Rules 62-296.712(2) and 62-296.320(4)(b)1., F.A.C.]

- A) The permittee shall not cause, permit, or allow emissions of particulate matter in excess of 0.03 gr/dscf.
- B) The permittee shall not 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 20 percent opacity.

B.4. Test EU No. 005 for particulate matter emissions and visible emission while processing XP boards and while processing EXP boards through the kiln. Following the initial test, the visible emissions test shall be performed annually thereafter and the kiln shall be tested for particulate matter emissions prior to renewal of the operating permit. The duration of the EPA Method 9 test shall be at least 30 minutes and shall be conducted concurrently with the Method 5 test. Submit two copies of the test data to the Air Compliance Section of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Test procedures shall be consistent with the requirements of 40

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CFR 60 and Rule 62-297, F.A.C. [Rules 62-297.310(4) and (7) and 62-4.070(3), F.A.C. and Permit Nos. 0571242-007-AC and -008-AC]

B.5. Testing of emissions shall be conducted with each source operating at capacity. Capacity is defined as 90-100% of the rated capacity of 165 MMBtu/hr. 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 EPC. Failure to submit the material input rates and actual operating conditions, such as the thermal input rates and material throughput rates may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

B.6. Compliance with the emission limitations of Specific Condition Nos. B.1. and B.3. shall be determined using EPA Methods 1, 2, 4, 5, and 9 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

B.7. Compliance with Specific Condition No. B.2.D) shall be demonstrated by either of the following: [Rules 62-297.440 and 62-4.070(3), F.A.C.]

- C) A Certificate of Fuel Oil Analysis* from a fuel oil vendor of each shipment of fuel oil received.
- D) Certificate of Fuel Oil Analysis* for a fuel oil sample taken by the permittee from each shipment of fuel oil received.

* According to the most current version of ASTM Method D-396 or D-4294.

B.8. In order to demonstrate compliance with Specific Condition Nos. B.1. and B.2., the permittee shall maintain a daily recordkeeping system for the most recent five year period. The records shall be maintained onsite and shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal agency upon request. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C.]

- A) Day, Month
- B) Monthly total amount of natural gas used in the Kiln (in thousand cubic feet)
- C) The hours the Kiln operated while firing on natural gas
- D) Monthly amount of fuel oil used for the Kiln (gallons)
- E) The hours the Kiln operated while firing on fuel oil
- F) Monthly total amount of XP boards produced
- G) Monthly total amount of EXP boards produced

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- H) Monthly total amount of Regular boards produced
- I) Rolling 12 consecutive month totals of B) through H) above.
- J) Fuel sulfur analyses as required in Specific Condition No. B.7.
- K) Inspection records as required in the Operation and Maintenance Plan for Particulate Control in Appendix A and Specific Condition No. FW.9.

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SPECIFIC CONDITIONS:

Section C. The following specific conditions apply to the following emission units:

EU No.	Description
006	Stucco Handling
007	Gypsum Rock/BPG Silo
008	BET Unit No. 1 (Riser Maker)
009	BET Unit Nos. 2 and 3
010	Starch Silo
011	Gypsum Handling & Storage
012	Waste Wallboard Crusher
014	Raw Material Conveyor System
015	Imp Mill Building
016	Outdoor Gypsum Storage Pile Area

C.1. As requested by the permittee, in order to limit the potential to emit, the permittee shall not exceed the following emissions limitations listed in the table. [Rule 62-4.070(3), F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

E.U. No.	Description	gr/dscf	PM (tpy)	Opacity (%)
006	Stucco Handling	0.020	5.0	5
007	Gypsum/BPG Silo	0.020	2.4	5
008	BET Unit No. 1 (Riser Maker)	0.010	2.5	5
009	BET Unit Nos. 2 and 3			
	EP 1 - BET Unit No. 2	0.010	2.5	5
	EP 2 - BET Unit No. 3	0.010	2.5	5
010	Starch Silo	0.020	0.6	5
011	Gypsum Handling & Storage	--	2.5	5
012	Waste Wallboard Crusher	--	3.5	5
014	Raw Material Conveyor System	--	2.5	5

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015	Imp Mill Building	--	--	0
016	Outdoor Gypsum Storage Pile Area	--	3.0	5

C.2. As requested by the permittee, in order to limit the potential to emit, the following material and air flow rate limitations shall apply. [Rule 62-4.070(3), F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

EU No.	Emission Unit	Material Input	Maximum ACFM	Maximum DSCFM
006	Stucco Handling	120 tons/hour	6,600	6,600
007	Gypsum/BPG Silo	350 tons/hour	3,200	3,200
008	BET Unit No. 1	900 Risers/hr	6,600	6,600
009	BET Unit Nos. 2 and 3			
	EP 1 - BET Unit No. 2	4.5 tons/hour	6,600	6,600
	EP 2 - BET Unit No. 3	4.5 tons/hour	6,600	6,600
010	Starch Silo	100 tons/hour	800	800
011	Gypsum Handling & Storage	800,000 tons/year	--	--
012	Waste Board Crusher	76,000 tons/year	--	--
014	Raw Material Transfer System	876,000 tons/year	--	--
015	Imp Mill Building	NA	--	--
016	Outdoor Gypsum Storage Pile Area	300 tons/hour and 100,000 tons/year		

C.3. The permittee shall not cause, permit, or allow any visible emissions greater than five (5) percent opacity from any handling activity associated with the outdoor gypsum storage pile, including but not limited to, the activities listed below: [Rule 62-296.711(2)(a), F.A.C., Ch. 1-3.52 of the Rules of EPCHC, and Permit No. 0571242-009-AC]

A) Truck Unloading

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- B) Front End Loaders
- C) Truck Loading

C.4. The permittee shall operate as necessary a dedicated sprinkler system on the raw material conveyor system transfer points. The sprinklers shall be in use as necessary to ensure compliance with the visible emissions limits while material is being transferred using the conveyor system. Monthly inspections of the sprinkler system shall be performed and documented. [Rule 62-4.070(3), F.A.C.]

C.5. In order to ensure compliance with Specific Condition Nos. C.1. and C.3., the following limitations and restrictions shall apply per any twelve consecutive month period: [Rules 62-4.070(3) and 62-210.200 – Definitions, Potential to Emit, F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

- A) The maximum truck unloading rate to the outdoor gypsum storage pile shall not exceed 300 tons/hour.
- B) The maximum truck loading rate from the outdoor gypsum storage pile shall not exceed 300 tons/hour.
- C) The permittee shall maintain a permanent water spray system that is capable of reaching the top of the outdoor gypsum storage pile to adequately wet the material as needed to comply with the opacity standard specified in Specific Condition Nos. C.1. and C.3.
- D) Perform and document monthly maintenance inspections of the outdoor gypsum storage pile water spray system.
- E) Minimize the pile height of the outdoor gypsum storage pile as needed.
- F) The shrink wrap machine shall not be operated more than 4,395 hours per year. The hours of operation shall be calculated by multiplying the number of railcars loaded by 1.5 hours/railcar.
- G) The hours of operation of Nos. 006 – 012 and 014 – 016 are not limited.

C.6. Test the EU Nos. 006 – 012 and 014 - 016 once per federal fiscal year (October 1 through September 30) for opacity and as specified in Specific Condition Nos. C.7. – C.13. Submit two copies of the test data to the Air Compliance Section of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Test procedures shall be consistent with the following and the requirements of 40 CFR 60 and Rule 62-297, F.A.C. [Rules 62-297.310(4) and (7) and 62-4.070(3), F.A.C. and Permit Nos. 0571242-007-AC and -008-AC]

- A) The duration of the Method 9 visible emissions test for EU Nos. 006, 008, 009, 010, and 016 shall be 30 minutes.
- B) For EU Nos. 007, 011, 012, 014, and 015 testing shall be performed in accordance with 40 CFR 60 Subpart OOO.
- C) A minimum 12-minute Method 9 observation is required for any dust collector, in operation on a daily basis, with a pressure differential reading greater than 6 inches water, to confirm compliance with the visible emission standard.

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C.7. In addition to the testing requirements in Specific Condition No. C.6., test the truck unloading to the outdoor gypsum storage pile operation and the truck loading from the outdoor gypsum storage pile operation for visible emissions at the point of highest opacity once per federal fiscal year (October 1 – September 30). Submit two copies of the test results to the Environmental Protection Commission of Hillsborough County within 45 days of testing. The visible emission tests shall be conducted in accordance with Rule 62-297.310, F.A.C. [Rules 62-297.310(4)(a)2.a. and (7), F.A.C.]

C.8. For the gypsum handling and storage (EU No. 011), the visible emissions testing shall be completed while unloading natural gypsum or BPG and while transferring material via the conveyor system (loading the hopper). A separate visible emissions observation (test) shall be conducted for each opening that is open during the normal transfer of materials within the dome. [Rule 62-4.070(3), F.A.C. and Permit No. 0571242-003-AC]

C.9. The EPA Method 9 test for the raw material conveying system (EU No. 014) shall use the procedures in 40 CFR 60.11 with the following conditions: [40 CFR 60.675(c)(1), Rule 62-4.070(3), F.A.C., and Permit No. 0571242-007-AC]

- A) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
- B) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (*e.g.*, road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.
- C) For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible.

C.10. For the Imp Mill building, the duration of the EPA Method 22 tests shall be at least 75 minutes, with each side of the building and the roof being observed for at least 15 minutes. The performance test shall be conducted while all affected facilities inside the building are operating. [Rule 62-4.070(3), F.A.C. and 40 CFR 60.675(b)(2) and (d)]

C.11. For the Waste Wallboard Crusher (EU 012), the duration of the EPA Method 9 test may be reduced from 3 hours (thirty 6-minute averages) to 1 hour (ten 6-minute averages) only if the following conditions apply: [Rule 62-4.070(3), F.A.C. and 40 CFR 60.675(4)]

- A) There are no individual readings greater than 15 percent opacity; and
- B) There are no more than 3 readings of 15 percent for the 1-hour period

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C.12. Testing of emissions shall be conducted with each source operating at capacity. Capacity is defined as 90-100% of the rated capacity of the material input rates listed in Specific Condition No. C.2. For the Imp Mill building, the performance test shall be conducted while all affected facilities inside the building are operating at capacity. 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 EPC. Failure to submit the material input rates and actual operating conditions, such as pressure drop across the baghouse and material throughput rates may invalidate the test. [Rules 62-4.070(3) and 62-297.310(2), F.A.C.]

C.13. Compliance with the emission limitations of Specific Condition Nos. C.1. and C.3. shall be determine using EPA Methods 9 or 22 contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A. [Rules 62-4.070(3) and 62-297.310(7), F.A.C.]

C.13. In order to demonstrate compliance with the limits established in Specific Condition Nos. C.1., C.2., C.4. and C.5. the permittee shall maintain a daily recordkeeping system for the most recent five year period. The records shall be maintained onsite and shall be made available to the Environmental Protection Commission of Hillsborough County, state or federal agency upon request. [Rules 62-4.070(3) and 62-4.160(14)(b), F.A.C. and Permit Nos. 0571242-007-AC, -008-AC, and -009-AC]

- A) Day, Month
- B) Monthly total amount of gypsum (natural and by-product gypsum) received at the facility (tons)
- C) Monthly total amount of gypsum (natural and by-product gypsum) received and stored in the outdoor gypsum storage pile area (tons)
- D) Monthly total amount of gypsum (natural and by-product gypsum) processed (dry tons)
- E) Individual monthly material throughput for each emission unit, except EU Nos. 013 and 015
- F) Number of railcars shipped offsite.
- G) Rolling 12 consecutive month totals of B) through F) above.
- H) Records of the monthly inspections and any maintenance performed on the sprinklers and sprinkler system for the raw material conveyors as required in Specific Condition No.C.4.
- I) Records of the inspections and any maintenance work performed on the outdoor gypsum storage pile water spray system as required in Specific Condition No. C.5.
- J) Inspection records as required in the Operation and Maintenance Plan for Particulate Control in Appendix A and Specific Condition No. FW.9.

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Section D. The following specific conditions apply to the following emission units:

EU No.	Description
017	166 HP Emergency Engine
018	33 HP Emergency Engine

D.1. The facility is subject to 40 CFR 63, Subpart ZZZZ, since the facility owns/operates stationary RICEs (EUs 017 and 018) at an area source of HAP emissions. [Rule 62-204.800, F.A.C. and 40 CFR 63.6585(a)]

D.2. Since EU 017 and 018 are existing stationary CI RICE located at an area source of HAP missions, the facility must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [Rule 62-204.800, F.A.C. and 40 CFR 63.6595(a)(1)]

D.3. Compliance with the numerical emission limitations established in 40 CFR 63, Subpart ZZZZ is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in 40 CFR 63.6620 and Table 4 to this Subpart. [Rule 62-204.800, F.A.C. and 40 CFR 63.6603(a)]

(a) Since the facility owns/operates existing stationary RICEs located at an area source of HAP emissions, the facility must comply with the requirements in Table 2d to this Subpart that apply to the RICE.

D.4. The facility must be in compliance with the emission limitations and operating that apply to the facility. At all times the facility must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the facility to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the EPC which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [Rule 62-204.800, F.A.C. and 40 CFR 63.6605]

D.5. Monitoring, installation, collection, operation, and maintenance requirements. [Rule 62-204.800, F.A.C. and 40 CFR 63.6625]

- (a) Reserved.
- (b) Reserved.
- (c) Reserved.
- (d) Reserved.

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(e) If the facility operates any of the following stationary RICE, the facility must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

- (1) Reserved.
- (2) Reserved.
- (3) An existing emergency, or black start stationary RICE located at an area source of HAP Emissions.
- (4) thru (10) Reserved.

(f) If the facility owns or operates an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, the facility must install a non-resettable hour meter if one is not already installed.

(g) Reserved.

(h) If the facility operates a new, reconstructed, or existing stationary engine, the facility must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to this Subpart apply.

(i) If the facility owns or operates a stationary CI engine that is subject to the work, operation or management practices in items 1 or 4 of Table 2d to this Subpart, the facility has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

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(j) Reserved.

D.6. Monitoring and collecting data requirements for demonstration of continuous compliance: [Rule 62-204.800, F.A.C. and 40 CFR 63.6635]

(a) If the facility must comply with emission and operating limitations, the facility must monitor and collect data according to this section.

(b) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the facility must monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(c) The facility may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The facility must, however, use all the valid data collected during all other periods.

D.7. Demonstration of continuous compliance with the emission limitations and operating limitations. [Rule 62-204.800, F.A.C. and 40 CFR 63.6640]

(a) The facility must demonstrate continuous compliance with each emission limitation and operating limitation in Table 2d to this Subpart that applies to the facility according to methods specified in Table 6 to this Subpart.

(b) The facility must report each instance in which the facility did not meet each emission limitation or operating limitation in Table 2d to this subpart that apply to the facility. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in 40 CFR 63.6650.

(c) Reserved.

(d) Reserved.

(e) Reserved.

(f) *Requirements for emergency stationary RICE.* If you own or operate an emergency stationary RICE, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency

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demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 CFR 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Reserved.

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and

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testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

D.8. Recordkeeping requirements. [Rule 62-204.800, F.A.C. and 40 CFR 63.6655]

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(a) If the facility must comply with the emission and operating limitations, the facility must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3), and (c) below.

(1) Reserved.

(2) Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(b) Reserved.

(c) Reserved.

(d) The facility must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to the facility.

(e) The facility must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the facility operated and maintained the stationary RICE and after-treatment control device (if any) according to the facility's own maintenance plan if the facility owns or operates any of the following stationary RICE;

(1) Reserved.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

(f) If the facility owns or operates any of the stationary RICE in paragraphs (f)(1) or (2) below, the facility must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-

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emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(1) Reserved.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

D.9. Additional recordkeeping requirements. [Rule 62-204.800, F.A.C. and 40 CFR 63.6660]

(a) The facility's records must be in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1).

(b) As specified in 40 CFR 63.10(b)(1), the facility must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) The facility must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).

D.10. Definitions. Terms and definitions used in this Subpart ZZZZ are defined under 40 CFR 63.6675. Tables to this Subpart are attached to this permit. [Rule 62-204.800, F.A.C. and 40 CFR 63.6675]

Table 2d to Subpart ZZZZ of Part 63— Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

As stated in 40 CFR 63.6603 and 63.6640, the facility must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

For each . . .	You must meet the following requirement, except during periods of startup . . .
4. Emergency stationary CI RICE and black start stationary CI RICE. ²	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ¹
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and

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For each . . .	You must meet the following requirement, except during periods of startup . . .
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

¹Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

Table 6 to Subpart ZZZZ of Part 63—Continuous Compliance with Emission Limitations, Operating Limitations, Work Practices, and Management Practices

As stated in 40 CFR63.6640, the facility must continuously comply with the emissions and operating limitations and work or management practices as required by the following:

For each . . .	Complying with the requirement to . . .	You must demonstrate continuous compliance by . . .
9. Existing emergency and black start stationary RICE ≤500 HP located at a major source of HAP, existing non-emergency stationary RICE <100 HP located at a major source of HAP, existing emergency and black start stationary RICE located at an area source of HAP, existing non-emergency stationary CI RICE ≤300 HP located at an area source of HAP, existing non-emergency 2SLB stationary RICE located at an area source of HAP, existing non-emergency landfill or digester gas stationary SI RICE located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE ≤500 HP located at an area source of HAP, existing non-emergency 4SLB and 4SRB stationary RICE >500 HP located at an area source of HAP that operate 24 hours or less per calendar year	a. Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

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ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

