TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

American Cement Company, LLC
P.O. Box 445
Sumterville, FL 33585

Facility ID No. 0810053

PROJECT

Project No. 0810053-016-AC
Application for Minor Air Construction Permit
Project Name: Construction Modifications to the Four Cement Storage Silos

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Management
Southwest District Office
Temple Terrace, Florida 33637-7600

February 10, 2011

Prepared by Danny Stubbs

GENERAL PROJECT INFORMATION

Air Pollution Regulations

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

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

Glossary of Common Terms

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

I. Project Description:

A. Applicant:

Mr. Cary O. Cohrs, President
American Cement Company, LLC
P.O. Box 445
Sumterville, FL 33585

B. Professional Engineer:

Mr. John B. Koogler, Ph.D., P.E.
Koogler and Associates, Inc.
4014 NW 13th Street
Gainesville, Florida 32609

C. Project Location:

The facility is located at 13250 Eastern Avenue, Manatee County.

D. Project Summary:

This project will modify Emissions Unit ID No. 001 by excluding one of the four silos from it and creating a new emissions unit, Emissions Unit ID No. 008, with the excluded silo. When the project is complete, Emissions Unit ID No. 001 will consist of three silos (i.e., Silos 2, 3 and 4) all controlled with a common baghouse, and Emissions Unit ID No. 008 will consist of one silo (i.e., Silo 1) which will be controlled with its own dedicated baghouse. This project will physically isolate all interconnecting piping between Silo 1 and the other silos (i.e., Silos 2, 3, and 4). The isolated silo (Silo 1) will then be used to store white cement received from either ships/barges or from super sacks. Cement from the super sacks will be pneumatically delivered to the silo via a newly installed portable blower system.

E. Application Information:

Application Received on: 10/14/2010
Additional Information Requested on: 11/10/2010
Additional Information Received on: 12/20/2010
Application Complete: 12/20/2010

II. Rule Applicability

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

Subject to:	Y/N	Comments
Rule 62-210.300, F.A.C. - Project Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements, F.A.C.	Y	not exempt from general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Cement handling and storage operations are a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	N	Cement handling and storage operations are a not sources of VOC and odors
Rule 62-296.400, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	This facility is not a source of VOCs.
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	Per Rule 62-296.700(2)(b), the facility is exempt from provisions of the PM RACT rule.
Rule 62-204.800, F.A.C. - Standards of	N	there is no applicable source category

Subject to:	Y/N	Comments
Performance for New Stationary Sources (NSPS)		
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VE testing is required.

III. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions	Allowable Emissions
PM	001 (Silo Nos. 2, 3 & 4)	0.03 grains/dscf 1.82 lb/hr (@ 7,071 dscfm) 7.97 tons/year	0.03 grains/dscf 1.82 lb/hr (@ 7,071 dscfm) 7.97 tons/year
PM	008 (Silo No. 1)	0.03 grains/dscf 1.37 lb/hr (@5300 dscfm) 6.0 tons/year	0.03 grains/dscf 1.37 lb/hr (@5300 dscfm) 6.0 tons/year
PM	009 (Portable blower)	0.03 grains/dscf 0.3 lb/hr (@1150 dscfm) 1.3 tons/year	None
	Total	3.49 lb/hr 15.27 tons/year	
VE	001		5%
	008		5%
	009		5%

Notes: (1) E.U. ID No. 001 potential emissions were based on the baghouse test flow rate of 7071 dscf (performed of 05/01/87); (2) E.U. ID Nos. 008 and 009 potential emissions were based on the baghouse design flow rate of 5300 dscfm and 1150 dscfm, respectively (see permit application dated 10-14-2010). The allowable emissions for E.U. ID Nos. 001 and 008 were specified to qualify for facility for the particulate RACT exemption of Rule 62-296.700(2)(b), F.A.C.

IV. Conclusions

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

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

V. Preliminary Determination

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

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