Florida Department of Environmental Protection

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

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T. Vinyard Jr.
Secretary

FINAL PERMIT

PERMITTEE

K.C. Industries, LLC
2420 Old Highway 60
Mulberry, Florida 33860

Authorized Representative:
Mr. Dean Qualls, Plant Manager

Air Permit No. 1050066-012-AF
Permit Expires: 03/21/2017
Site Name : K.C. Industries, LLC
Federally Enforceable State Operating Permit (FESOP)
Operation Permit Renewal

This is the final air operation permit to renew the Operation Permit 1050066-010-AF for a Fluorosilicates product production facility. The work is conducted at the K.C. Industries, LLC (Standard Industrial Classification No. 2819). The facility is located in Polk County at 2420 Old Highway 60 in Mulberry, Florida. The UTM coordinates are Zone 17, 401.72 km East, and 3086.80 km North.

This final permit is organized by the following sections:

Section 1. General Information

Section 2. Administrative Requirements and Facility-wide Specific Conditions

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

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

This air pollution permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit.

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

Executed in Hillsborough County, Florida

_____ _____

Robert C. Wong Effective Date
District Air Program Administrator
Southwest District

CERTIFICATE OF SERVICE

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

Dean Qualls, K.C. Industries, LLC (dqualls@kcindustries.com)

Clerk Stamp

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

_____ _____

(Clerk) (Date)

FACILITY AND PROJECT DESCRIPTION

This facility produces sodium fluorosilicate (SSF) and potassium fluorosilicate (PSF). The existing facility consists of the following emissions units.

Facility ID No. 1050066	
ID No.	Emission Unit Description
001	SSF and PSF Production
002	Fluorosilicate Products Truck Unloading and Bagging Operations

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a synthetic non-Title V source of the pollutant PM_{10}.

Exempt Emission Units/Activities

- A boiler with a design heat input rate of 184,000 Btu/hr.

[Rule 62-210.300(3)(a)35., F.A.C.]

PERMIT HISTORY/AFFECTED PERMITS

Replaces Permit No. 1050066-010-AF and as amended by Permit No. 1050069-011-AF

SECTION 2. ADMINISTRATIVE REQUIREMENTS AND FACILITY-WIDE SPECIFIC CONDITIONS (FINAL)

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

   Florida Department of Environmental Protection
   Southwest District Office
   Air Resource Management Section
   13051 North Telecom Parkway
   Temple Terrace, Florida 33637-0926
   Telephone: 813-632-7600

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

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Southwest District Office's Air Resource Management Section (see above mailing address and phone number)

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

   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions;
   d. Appendix D. Common Testing Requirements; and
   e. Appendix E. Attachment A: Operation and Maintenance Manual

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

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

6. Modifications: Unless otherwise exempt by rule, the permittee shall not initiate any construction, reconstruction, or modification at the facility and shall not install/modify any pollution control device at the facility without obtaining prior authorization from the Department. Modification is defined as: Any physical change or changes in the method of operations or addition to a facility that would result in an increase in the actual emissions of any air pollutant subject to air regulations, including any not previously emitted, from any emission unit or facility.
   [Rules 62-210.200 - Definition of "Modification" and 62-210.300(1)(a), F.A.C.]

7. Annual Operating Report: On or before **April 1** of each year, the permittee shall submit a completed DEP Form 62-210.900(5), "Annual Operating Report for Air Pollutant Emitting Facility" (AOR) for the preceding calendar year. The report may be submitted electronically in accordance

with the instructions received with the AOR package sent by the Department, or a hardcopy may be sent to the Compliance Authority.
[Rule 62-210.370(3), F.A.C.]

8. Operation Permit Renewal Application: A completed application for renewal of the operation permit shall be submitted to the Permitting Authority no later than 60 days prior to the expiration date of the operation permit. To properly apply for an operation permit, the applicant shall submit the following:

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

   b. the appropriate operation permit application fee from Rule 62-4.050(4)(a), F.A.C.;

   c. copies of the most recent compliance test reports required by Specific Condition Nos. A.12. and B.11., if not previously submitted;

   d. copies of the most recent month of records/logs specified in Specific Condition No(s). A.14. and B.12.; and

   e. any proposed revisions to the most recently approved O & M Plan .

   [Rules 62-4.030, 62-4.050, 62-4.070(3), 62-4.090, 62-210.300(2), and 62-210.900, F.A.C.]

A. EU No. 001 SSF and PSF Production

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Fluorosilicic acid (FSA), a by-product of the phosphate fertilizer industry stored on site in (4) tanks, and salt (sodium chloride or potassium chloride) stored on site in two salt storage tanks are mixed in two of three available reactors. After the chemical reactions are complete, the content of the reactors enter a classifier. The product is then pulled through a vacuum filter. The wet solid sodium or potassium fluorosilicate cake from the vacuum filter is fed to the drying column by a screw conveyor at a maximum rate of 10 tons of wet cake per hour. Heated drying air for the drying column is provided by a 14 MMBtu/hour natural gas fired air heater. From the drying column the dry product and exhaust air are discharged into a process cyclone for separation. The dry product exits the bottom of the cyclone directly into a truck trailer and the air exits the top of the cyclone. Most of the exhaust air is recycled to the drying column via the air heater. A small portion of the exhaust air is transferred for emissions control to a process venturi scrubber and then a final wet scrubber. The gas stream leaving the wet scrubber is vented to the atmosphere through a circular duct. Scrubbing water used in the venturi scrubber and the wet scrubber is sent to the scrubber sump and is recycled and used in the reactors. Maximum production yield from the drying column is 9 tons per hour of dry sodium fluorosilicate (SSF) or potassium fluorosilicate (PSF). The production process has a truck in place to collect the product any time the plant is operating. When the process is complete the production process is shut down and the truck trailer transfers the product to the bagging facility (EU002). The truck loading system has a dust filtering sock on the trailer vent ports on the top of the trailer.

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The maximum drying column process rate shall not exceed 9.0 tons per hour (daily average based on actual hours of drying column operation) measured as dry material production from the drying column.
[FESOP 1050066-009-AF]

See Section 4, Appendix D, No. 1 for requirements for operating rate during testing.

A.2. Scrubber Operating Requirements: The following control device operation parameters and operating levels shall be maintained:

a. Venturi Scrubber

1. Pressure Drop across the venturi scrubber shall be maintained at 8 to 14 inches of water, unless a subsequent compliance test demonstrates that an alternative pressure drop range controls emissions to levels that do not exceed the permit limitations.

2. The scrubber water flow shall be maintained at a flow rate of 50 to 55 gallons per minute (gpm), unless a subsequent compliance test demonstrates that an alternative flow rate range controls emissions to levels that do not exceed the permit limitations.

b. Wet Scrubber

1. Pressure drop across the wet scrubber shall be maintained at 1.0 to 4.5 inches of water, unless a subsequent compliance test demonstrates that an alternative pressure drop range controls emissions to levels that do not exceed the permit limitations.
2. The scrubber water flow shall be maintained at a flow rate of 42 to 47 gallons per minute (gpm), unless a subsequent compliance test demonstrates that an alternative flow rate range controls emissions to levels that do not exceed the permit limits.

[FESOP 1050066-009-AF]

A.3. Circumvention of Emission Control Equipment - The permittee shall not circumvent any air pollution control device (i.e., venturi scrubber, wet scrubber, dust filtering socks) or allow the emissions of air pollutants without the applicable air pollution control devices operating properly.
[Rules 62-210.650 and 296.700(6), F.A.C.]

A.4. Restricted Operation: The drying column hours of operation are limited to 5,040 hours per any consecutive 12-month period. *Note: Operation shall be defined as any period during which material is being processed through the drying column.*
[FESOP 1050066-009-AF]

EMISSIONS STANDARDS

A.5. Visible Emissions Limitation: Visible Emissions (VE) from the wet scrubber's vent shall be less than 20% opacity.
[Rule 62-296.320(4)(b)1, F.A.C.; FESOP 1050066-009-AF]
**See PM RACT Note below*

A.6. Particulate Matter Emission Limitations: Particulate Matter (PM) emissions from the wet scrubber's vent shall not exceed 6.0 lbs/hr or 15.1 tons/year.
[FESOP 1050066-009-AF]
**See PM RACT Note below*

(* PM RACT Note: *Due to its location and potential PM emission rate, this facility is subject to the requirements of Rule 62-296.700 - Reasonably Available Control Technology (RACT) for PM. Based upon the determination that the combination of the cyclone separator, venturi scrubber, and wet scrubber provide greater than a 98% overall PM control efficiency, in accordance with the provisions of Rule 296.712(2), F.A.C. the above visible emission and PM limitations constitute PM RACT for this emission unit.*)

TESTING REQUIREMENTS

A.7. Compliance Tests : During each federal fiscal year (October 1st to September 30th), the wet scrubber's vent shall be tested to demonstrate compliance with the emissions standards for Particulate Matter (PM) and Visible Emissions (VE).
[Rule 62-297.310, F.A.C.]

A.8. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. Parameters from Specific Condition A.2. shall be recorded during any compliance tests and included with the test reports.
[Rule 62-297.310, F.A.C.]

A.9. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

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

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

A.10. Control Device Operation Parameter Change: To change the current operation parameters listed in Specific Condition No. A.2. a. or b., another compliance test with the alternative parameters shall be performed within 30 days of commencement of operation with the alternative parameters, and the results submitted to the Department with 45 days of the test. Acceptance by the Department shall automatically amend the permit to the new operation parameter ranges.
[FESOP 1050066-009-AF]

NOTIFICATION REQUIREMENTS

A.11. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

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

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

RECORDS AND REPORTS

A.12. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. In addition, the test results shall include the values of the scrubbers' operating parameters during the testing period (see Specific Condition No. A.2. a. and b.).
[Rule 62-297.310(2) and (8), F.A.C.; FESOP 1050066-009-AF]

A.13. Emission Control Equipment Parameter Data: The permittee shall maintain the following records for each production run (shall be done at least once per day that product is being produced) to document compliance with Specific Condition A.2.:

a. Venturi Scrubber

1. Pressure drop across the venturi scrubber shall be determined from pressure indicator readings or measured with a differential pressure indicator, and recorded;
2. The scrubber water flow rate shall be measured with a flow meter, and recorded.

b. Wet Scrubber

1. Pressure drop across the wet scrubber shall be determined from pressure indicator readings or measured with a differential pressure indicator, and recorded;
2. Scrubber water flow rate shall be measured with a flow meter, and recorded;

All of the above parameters shall be measured during all compliance tests and the values included with the stack test report.

[FESOP 1050066-009-AF]

A.14. Daily Log: The permittee shall measure and maintain the following records for each day that product is produced to document compliance with Specific Condition Nos. A.1. and A.4.:

a. Facility ID, and Emission Unit No. & Description (i.e., 1050066, EU 001-SSF and PSF Production);

b. The date;

c. Hours of operation of the drying column *(Operation shall be defined as any period which material is being processed through the drying column);*

d. Total hours of operations of the drying column during the most recent consecutive 12-month period.

e. Fluorosilicic acid (FSA) flowrate (tons/ hour) *[measured at least once per day]*;

f. FSA strength *(based on measuring FSA specific gravity) [measured at least once per day]*; and

g. Dailey Average SSF or PSF production rate (tons/hour dry product)

(*Production Rate Note: Production rate shall be calculated from d. and e. above based upon the following FSA recovery rates, or by referring to the appropriate conversion charts, which are based upon these recovery rates:*

SSF Production: 1.0 pound SSF produced for each 0.8 pounds of FSA reacted

PSF Production: 1.0 pound PSF produced for each 0.7 pounds of FSA reacted.

These records shall be recorded at the facility in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a three (3) year period.
[FESOP 1050066-009-AF]

A.15. Operation and Maintenance (O & M) Plan for PM Control: In accordance with the requirements of Rule 296.700(6), F.A.C.-PM RACT Operation and Maintenance (O&M) Plan, the venture and wet scrubber shall be operated and maintained in accordance with the February 1998 *Operation and Maintenance Manual for Drying Column Operation*. (Appendix E). [Rule 62-297.310(8), F.A.C.]

B. EU No. 002 Fluorosilicate Products Truck Unloading and Bagging Operations

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	A fluorosilicate product truck unloading system, and a product bagging system uses a General Resource Corporation Model LV-2000 pneumatic pulse type baghouse filter dust collector with a design air flow rate of 1744 acfm to control dust emissions from a 70 ton hopper. The 70 ton hopper is partially enclosed within the confines of the bagging facility building. For truck unloading the unloading blower is connected to the truck trailer, and the truck discharge line is connected to the transfer line of the hopper. The filter utilizes compressed air, injected in the opposite direction to the exhaust air flow, to clean the filters. The injected air is controlled by an electronic time programmed to operate to maintain the proper pressure differential. An exhaust blower mounted directly to the filter housing is used to move air through the filters. The clean air is discharged through the blower at ambient temperature to the atmosphere, at the top of the baghouse filter structure atop the bagging facility building. This facility manufactures SSF and PSF, but the bagging operation is permitted to process any fluorosilicate product, received from other facilities, as long as it consists of particles as large as or larger than SSF.

PERFORMANCE RESTRICTIONS

B.1. Permitted Capacity:

a. The bagging operation is permitted to process any fluorosilicate product, which can be demonstrated to consist of particles as large as or larger than SSF.

(Note*: Based upon particle size distribution analysis results submitted with the 05/15/97 permit amendment letter, it was demonstrated that PSF, Magnesium Fluorosilicate (MSF), and Ammonium Fluorosilicate (ASF) meet the criteria.)*

b. The maximum material bagging rate shall not exceed 12.5 tph (daily average based on actual bagging operation operating hours).

c. The maximum truck-unloading rate shall not exceed 33 tph (daily average based on actual truck unloading hours).

[FESOP 1050066-009-AF]

B.2. Circumvention of Emission Control Equipment - The permittee shall not circumvent any air pollution control device (i.e., baghouse) or allow the emissions of air pollutants without the applicable air pollution control devices operating properly.
[Rules 62-210.650 and 296.700(6), F.A.C.; FESOP 1050066-009-AF]

B.3. Hours of Operation: The hours of operation are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; FESOP 1050066-009-AF]

B. EU No. 002 Fluorosilicate Products Truck Unloading and Bagging Operations

EMISSIONS STANDARDS

B.4. Visible Emissions Limitation: Visible Emissions (VE) from the baghouse that controls the emissions from the truck unloading and bagging operations shall not exceed 5% opacity.
[Rule 62-296.711(2)(a), F.A.C. (PM RACT Material Handling); FESOP 1050066-009-AF]

B.5. Particulate Emission Limitations: PM emissions from the truck unloading and bagging operations shall not exceed 0.03 grains/dscf (approximately 0.45 pounds per hour based upon the maximum flowrate of 1744 acfm).
[Rule 62-296.711(2)(a), F.A.C. (PM RACT Material Handling); FESOP 1050066-009-AF]

TESTING REQUIREMENTS

B.6. Compliance Tests: During each federal fiscal year (October 1st to September 30th), the truck unloading and bagging operation baghouse filter exhaust shall be tested to demonstrate compliance with the emissions standards for opacity (VE).
[Rule 62-297.310, F.A.C.]

B.7. Visible Emission Testing in Lieu of Particulate Matter Stack Test: Based on the fact that this emissions unit is equipped with a baghouse filter control device, the above submittal of a VE test showing VE of 5% opacity or less will be accepted as documentation of compliance with the PM emission limit of Specific Condition No. B.4. However, should the Department have reason to believe the particulate emission standard is not being met, the Department may require that compliance with the particulate emission standard be demonstrated by stack testing in accordance with Rule 62-297, F.A.C.
[Rule 62-296.711(3)(c), F.A.C.; FESOP 1050066-009-AF]

B.8. Test Requirements: Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. Testing of emissions from the baghouse shall be conducted during simultaneous operation of both the truck unloading and bagging systems, at 90-100% of the maximum combined permitted rates specified in Specific Condition No. B.1., if feasible.
[Rule 62-297.310, F.A.C.]

B.9. Test Method(s): Required tests shall be performed in accordance with the following reference method(s).

Method(s)	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method(s) are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other method(s) may be used unless prior written approval is received from the Department.
[Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

NOTIFICATION REQUIREMENTS

B.10. Test Notification: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company, and the telephone number of the person conducting the test.

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

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

RECORDS AND REPORTS

B.11. Test Reports: The permittee shall prepare and submit reports for all required tests in accordance with the requirements specified in Appendix D (Common Testing Requirements) of this permit. A statement of the material being processed during any compliance test shall be included with all compliance test reports. A statement of the truck unloading and bagging system rates during the test shall be included with all test reports.
[Rule 62-297.310(8), F.A.C.]

B.12. Daily Log: The permittee shall maintain the following records to show compliance with Specific Condition No. B.1.:

a. Facility ID, and Emission Unit No. & Description (i.e., 1050066, EU 002-Fluorosilicate Products Truck Unloading and Bagging Operations);

b. The date;

c. Hours of operation of:

   1. Bagging
   2. Truck unloading
   3. Simultaneously processing (bagging & truck loading)

[*Operation shall be defined as any time that material is being unloaded from trucks (truck unloading operations) or being bagged (bagging operations)];*

d. The amount of material unloaded from truck (truck unloading operations);

e. The amount of material bagged (bagging operations); and

f. Calculate the daily average process rates (tons/hour) based on c., d. and e. above for:

   1. Bagging
   2. Truck unloading
   3. Simultaneously processing (bagging & truck loading)

These records shall be recorded at the facility in a permanent form suitable for inspection by the Department upon request, and shall be retained for at least a three (3) year period. [Rules 62-4.070(3), F.A.C.]

B.13. Operation and Maintenance (O & M) Plan for PM Control: The permittee shall maintain and implement an O & M Plan to include a schedule for the maintenance and inspection of the baghouse control device. Records of inspections, maintenance, and performance data of control devices and auxiliary equipment shall be retained by the emissions unit for a minimum of two (2) years and shall be made available to the Compliance Authority upon request. The performance parameters shall include operating rates and efficiencies. Such parameters and records shall include, at a minimum, that shown below.

Performance Parameters

1. Control device: Baghouse filter
2. Process controlled: Fluorosilicate products truck unloading and bagging operations
3. Control Device Manufacturer: General Resource Corporation
4. Model Name: Fluidizer LV-2000
5. Design Air Flow rate: 1744 acfm
6. Design Efficiency: 99.99%
7. Pressure Drop: 0.5 - 8.0 inches H_2O
8. Collector Area: 750 ft^2
9. Air to Cloth Ratio: 2:4:1
10. Bag Material: synthetic fabric
11. Filter Weave: filament
12. Gas Temperature: ambient
13. Bag Cleaning Method: compressed air pulsed jets

Operation and Maintenance Log

The following observations, checks, and maintenance shall be performed at the frequencies shown:

Daily (when truck unloading or bagging operations are in service)

1. Monitor and maintain the pressure drop between 0.5 and 8.0 inches of water.
2. Visually inspect baghouse emission point for VE and note any VE release on the O&M record log. If VE are evident refer to baghouse manufacturer's troubleshooting guide to determine and correct the problem. Record any correction steps taken.

Weekly

1. Monitor pressure drop during operation and record on the O& M record log.
2. Check and record (on the O&M record log) the air pressure to the baghouse pulse jets. Adjust pressure regulator as needed to maintain pressure between 80 and 100 psi.

Semi-Annually

1. Remove and replace the filter bags in accordance with the manufacturer's Installation Manual for the baghouse.

B. EU No. 002 Fluorosilicate Products Truck Unloading and Bagging Operations

2. Check for worn bag clamps and gaskets, and replace as necessary.

Every Five Years (During the 9-month period prior to applying for renewal of the operation permit)

1. Measure the exhaust flow rate (acfm) from the baghouse and record in the O&M record log.
2. The permittee shall maintain a list of the type and quantity of required spare parts for the control device.
3. The permittee shall maintain an O&M log which will indicate the following at a minimum.
   a. When inspections were made, what was inspected, & by whom.
   b. A record of any performance parameters taken during inspections or operational checks, along with the acceptable parameter ranges for each operation check.
   c. When maintenance was performed, what was done, and by whom.

[Rule 62-296.700(6)(a), F.A.C. (PM RACT - Operation and Maintenance Plan); FESOP 1050066-009-AF]