Lafarge North America, Inc.

Palatka Plant

Facility ID No.: 1070039
Putnam County

Title V Air Operation Permit Renewal

Permit Project No.: 1070039-018-AV
Renewal of Title V Air Operation Permit No. 1070039-017-AV

DRAFT/PROPOSED

Permitting & Compliance Authority:
Department of Environmental Protection
Northeast District Air Program
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256-7590
Telephone: (904) 256-1700
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Title V Air Operation Permit Renewal
Permit No. 1070039-018-AV

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Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Rick Scott
Governor

Jennifer Carroll
Lt. Governor

Herschel T.
Vinyard Jr.
Secretary

PERMITTEE:
Lafarge North America, Inc.
886 North, Highway 17
Palatka, Florida 32177

Permit No. 1070039-018-AV
Palatka Plant
Facility ID No. 1070039
Title V Air Operation Permit Renewal

The purpose of this permit is for the renewal of the Title V air operation permit for the above referenced facility. The existing facility is located at 886 North, Highway 17, Palatka, Putnam County; UTM Coordinates: Zone 17, 438.00 km East and 3290.00 km North.

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, 62-213. The above named permittee is hereby authorized to operate the facility in accordance with the terms and conditions of this permit.

Effective Date: xx, 20xx
Renewal Application Due Date: Exp. DATE -225, 20xx
Expiration Date: Eff. xx, 20xx

(Draft/Proposed)

Khalid Al-Nahdy, P.E.
District Air Program Administrator

KAA:yke

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Subsection A. Facility Description:

Lafarge North America, Inc. operates a synthetic gypsum wallboard forming facility that consists of major activities that include: raw material storage/ processing, cage mill dryer system and wallboard production.

Included in this permit are miscellaneous unregulated emissions units and/or activities.

Subsection B. Summary of Emissions Units:

	Description	Emission Point	Filter System
Regulated Emissions Units and associated Emission Points			
001	FGD Surge Bin #1 (55-ton Bin)	EP-01	FGD Surge Bin Filter
002	Cage Mill Dryer System #1	EP-02	Dust Collector
003	Imp Mill Feed Silo A (170-ton Bin)	EP-02/023	Dust Collector/Bin Filter
004	Imp Mill Flash Calciner System A	EP-04	Dust Collector
005	Imp Mill Air Cooling System A	EP-05	System Collector
006	Stucco Silo A (690-ton Bin)	EP-06	Silo Filter
007	Starch Silo	EP-07	Starch Silo Vent Filter
008	Sawing Systems/Dunnage Machines	EP-16	End Trim Dust Collector
009	Norba Grinder	EP-09	Norba Dust Collector
010	Belt Conveyors and Bucket Elevators.	Fugitive	None
011	Emergency Live Bottom Feed Hopper.	EP-011	BC-9 Nuisance Dust Collector
013	Wallboard Dryer (4 Natural Gas Burners)	EP-013A	None
		EP-013B	None
014	Ball Mills	EP-014	BMA Dust Collector
016	Landplaster Bin	EP-016	End Trim Dust Collector
017	Additives System and Pin Mixer	EP-017	Nuisance Dust Collector
018	Imp Mill Feed Silo B (170-ton Bin)	EP-02/023	Dust Collector/Bin Filter
019	Imp Mill Flash Calciner System B	EP-019	Dust Collector
020	Imp Mill Cooling System B	EP-020	System Filter
021	Stucco Silo B (690-ton Bin)	EP-021	Silo Filter
022	FGD Surge Bin (55-ton Bin) #2	EP-022	FGD Surge Bin Filter
023	Cage Mill Dryer System #2	EP-023	Dust Collector
024	Reclaim Processing and Screening	EP-024	None
025	IMP Mill Feed Silo C	EP-02/023	Fabric Filter
026	IMP Mill Flash Calciner System C	EP-026	Fabric Filter
027	Imp Mill Air Cooling System C	EP-027	Fabric Filter

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E.U. No.	Description	Emission Point	Filter System
028	Perkins diesel fired emergency generators (219 HP)	EP-028	N/A
029	Perkins diesel fired emergency generators (166HP)	EP-029	N/A
030	John Deere Water Pump	EP 030	N/A
Unregulated Emissions Units and Activities			
	Paved & unpaved roads (fugitive emissions)		
	Raw material & product storage piles, conveying & handling		
	Wood and metalworking shops		
	Painting operations/paint shop [1]		
	Sandblasting [2]		
	Pipe leaks [3]		
	Pump seals [3]		
	Packing leaks		
	Unconfined particulate from road dust/ miscellaneous sources		
	Lubricating oil reservoirs		
	Fire training		
	Loading/unloading/storage of packaged materials		
	Lab vents		
	Machine shops		
	Refueling		
	Space heaters		
	General purpose painting		
	Gypsum handling and storage system [4]		
	Limestone handling and storage system [4]		

[1] Not to exceed HAP and VOC rule reporting thresholds.
[2] With the exception of off property drift.
[3] In accordance with manufacturer's specified allowances under normal operation.
[4] Unregulated with the exception of compliance with Facility-Wide Condition No. 3.

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Subsection C. Applicable Regulations:

Based on the Title V air operation permit renewal application received October 18, 2011, this facility is a minor source of hazardous air pollutants (HAP). This facility operates two Perkins diesel fired emergency generators and a John Deere diesel fire water pump engine all three engines were manufactured and installed in 2000 and are subject to regulation under 40 CFR 63Subpart ZZZZ, - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

Based on the Title V air operation permit renewal application (Table 3-1) this facility has the potential to emit greater than 100,000 TPY of CO_2e emissions therefore the facility is classified as a major source of Greenhouse Gas base on EPA's 2010 Gas Tailoring Rule which establishes an approach to addressing greenhouse gas from stationary sources under the Clean Air Act.

The existing facility is not a PSD major source of air pollutants in accordance with Rule 62-212.400, F.A.C. for Sulfur Dioxide (SO_2), NO_X, CO and Volatile Organic Compounds (VOC) The potential PM_{10} emissions are synthetically limited to less than 250 TPY in order to avoid being subject to PSD regulations. A summary of applicable regulations is shown in the following table:

Regulation	**EU /EP No(s).**
40 CFR 60, Subpart A, NSPS General Provisions	EUs: 001,002,003, 004, 009-011, 014, 016, 018, 019,022, 023,024, 025, 026,
40 CFR 60, Subpart OOO, Nonmetallic Mineral Processing Plant	EUs: 001,003, 004, 009-011, 014, 016, 018, 019,022, 024, 025, 026,
40 CFR 60, Subpart UUU, Calciners and Dryers in Mineral Industries	EUs: 002 , 023
State Rule Citations (Rule 62-296; 62-297.310(7); Rule 62-212.400(12), F.A.C.)	EU: 005, (EPt 05), EU: 006, EU: 007, EU: 013, (EPt. 013), EU: 017, EU: 020, (EPt 020), EU: 027, (EPt 027), EU: 021,
40 CFR 63, Subpart A, NESHAP General Provisions 40 CFR 63, Subpart ZZZZ	EUs: 028, 029, 030

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The following conditions apply facility-wide to all emission units and activities:

FW1. Appendices: The permittee shall comply with all documents identified in Section IV, Appendices, listed in the Table of Contents. Each document is an enforceable part of this permit unless otherwise indicated. [Rule 62-213.440, F.A.C.]

Emissions and Controls

FW2. **Not federally Enforceable**: Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An "objectionable odor" means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rule 62-296.320(2) and 62-210.200(Definitions), F.A.C.]

FW3. General Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed-necessary and ordered by the Department. [Rule 62-296.320(1), F.A.C.]

{Permitting Note: Nothing is deemed necessary and ordered at this time.}

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b)1, F.A.C.]

FW5. Unconfined Particulate Matter. No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction; alteration; demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

a. Vehicular traffic on paved and unpaved roads.
b. Wind-blown dust from yard areas.
c. Periodic abrasive blasting

The following techniques may be used to control unconfined PM emissions on an as-needed basis:

a. Paving and maintenance of roads, parking areas, and yards.
b. Chemical (dust suppressants) or water application to:

- Unpaved roads
- Unpaved yard areas

c. Landscaping or planting of vegetation
d. Confining abrasive blasting where possible.
e. Other techniques, as necessary.

[Rule 62-296.320(4)(c), F.A.C.; and, 1070039-001-AC]

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Annual Reports and Fees

See Appendix RR, Facility-wide Reporting Requirements for additional details.

FW6. Annual Operating Report. The permittee shall submit an annual report that summarizes the actual operating rates and emissions from this facility. Annual operating reports shall be submitted to the Compliance Authority by April 1st of each year. [Rule 62-210.370(3), F.A.C.]

FW7. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm [Rule 62-213.205, F.A.C.]

FW8. Annual Statement of Compliance. The permittee shall submit an annual statement of compliance to the compliance authority at the address shown on the cover of this permit within 60 days after the end of each calendar year during which the Title V permit was effective. [Rules 62-213.440(3)(a)2. & 3. and (3)(b), F.A.C.]

FW9. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

a. Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.

b. Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.

[40 CFR 68]

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The specific conditions in this section apply to the following emissions unit(s):

The following emission units are subject to NSPS requirements/standards in 40 CFR 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants and 40 CFR 60 (Subpart A, Standards of Performance for New Stationary Sources – General Provisions) adopted and incorporated by reference in Rule 62-204.800, F.A.C.:

EU	BRIEF DESCRIPTION	EMISSION POINT
001	FGD Surge Bin #1 (55-ton)	EP-001 - Indoor
003	Imp Mill Feed Silo A (170 ton)	EP-002/023
004	Imp Mill Flash Calciner System A	EP-004
009	Norba Grinder	EP-009 - Indoor
010	Belt Conveyors and Bucket Elevators	Fugitive
011	Emergency Live Bottom Feed Hopper	EP-011- Indoor
014	Ball Mills	EP-014 - Indoor
016	Landplaster Bin	EP-016 - Indoor
018	Imp Mill Feed Silo B (170)	EP-002/023
019	Imp Mill Flash Calciner System B	EP-019
022	FGD Surge Bin (55-ton) #2	EP-022
024	Reclaim Processing and Screening	EP-024
025	Imp Mill Feed Silo C	EP-002/023
026	Imp Mill Flash Calciner System C	EP-026

Emission Unit 001 (EU001) and Emission Unit 022 (EU 022), 55 TPH capacity gypsum indoor FGD Surge Bins #1 and #2 are controlled by a single FDG surge bin filter for particulate matter control. The fabric filter's primary purpose is to recover product and return it to the process.

Emission Unit 003 (EU003), Emission Unit 018 (EU 018), and Emission Unit 025 (EU 025) 170 TPH capacity gypsum Imp Mill Feed Silo A, B, and C are ducted to the cage mill dust collector system (EPt 002 and 023), which pulls negative draft on the silo.

Emission Unit 004 (EU004) and Emission Unit 019 (EU019), 55 TPH Imp Mill Flash Calciner System A and B, are designed to grind dried gypsum material to specified fineness and remove chemically bound water from the gypsum forming stucco. The units are each associated with a 40 MMBTU/hr natural gas fired burners. Emissions from the systems are controlled by separate dust collectors.
Permit No. 1070039-015-AC, issued October 12, 2009 lowered allowable PM emission limits to .017 gr/dscf (facility's request to escape PSD).

Emission Unit 009 (EU009) 20 TPH Norba Grinder located indoor is used to grind and pulverize large pieces of wallboard generated in the sawing and trimming operations. The grounded pulverized material is reintroduced into the wallboard process. Dust emissions generated from the grinding process are controlled by a fabric filter dust collector (Norba dust collector). Emissions are exhausted indoors.

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Emission Unit 011 (EU011) 25 TPH Emergency Live Bottom Feed Hopper located indoors. Emissions generated are controlled by a BC-9 Nuisance dust collector.

Subsection A.

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum allowable operating rate is as follows:

EU	BRIEF DESCRIPTION	CAPACITY
001	FGD Surge Bin # 1 (55-ton) **NOTE (1)**	55 TPH gypsum
003	Imp Mill Feed Silo A	170 TPH gypsum
004	Imp Mill Flash Calciner System A	55 TPH, 40 MMBTU/hr Natural Gas
009	Norba Grinder	20 TPH pulverized gypsum
010	Belt Conveyors and Bucket Elevators	N/A
011	Emergency Live Bottom Feed Hopper	25 TPH gypsum
014	Ball Mills	N/A
016	Landplaster Bin	N/A
018	Imp Mill Feed Silo B	170 TPH gypsum
019	Imp Mill Flash Calciner System B	55 TPH, 40 MMBTU/hr Natural Gas
022	FGD Surge Bin (55-ton) #2 **NOTE (1)**	55 TPH gypsum
024	Reclaim Processing and Screening	96 TPH
025	Imp Mill Feed Silo System C	170 TPH gypsum
026	Imp Mill Flash Calciner System C	55 TPH, 40 MMBTU/hr Natural Gas

NOTE (1) The fabric filter's primary purpose is to recover product and return it to the process.
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Hours of Operation: These emission units are allowed to operate continuously, i.e. 8760 hrs/yr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.3. Method of Operation- Emissions Unit Nos. 004, 019, 026: These emissions units are permitted to use natural gas as fuel.

[Rule 62-210.200(PTE), F.A.C.; Permit No. 1070039-015-AC]

A.4. Emissions Unit Operating Rate Limitation After Testing: See the related testing provisions in Appendix TR, Facility-wide Testing Requirements.

[Rule 62-297.310(2), F.A.C.]

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Emission Limitations and Standards

{Permitting note: Table 1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging time(s) for Specific Condition **A.5** is based on the specified averaging time of the applicable test method.

A.5. Maximum Allowable Emission Rate: The permitted maximum allowable emission rate for each pollutant is as follows:

POLL.	E.P.	EMISSION STANDARD/LIMIT		RULE
PM	EP-001	0.02 gr/dscf (0.05 g/ dscm)	0.05 lbs/hr, 0.23 TPY	40 CFR 60.672(a)
	EP-003 **Note (1)**	0.02 gr/dscf (0.05 g/ dscm)	0.05 lbs/hr, 0.23 TPY	40 CFR 60.672(e)
	EP-004	0.017 gr/dscf	1.89 lbs/hr, 8.3TPY	Air Permit No. 1070039-015-AC **NOTE (2)**
	EP-009	0.02 gr/dscf (0.05 g/ dscm)	3.6 lbs/hr, 15.77 TPY	40 CFR 60.672(a)
	EP-010	N/A	N/A	40 CFR 60.672(b)
	EP-011	N/A	N/A	40 CFR 60.672(f)
	EP-014	0.02 gr/dscf (0.05 g/ dscm)	0.19 lbs/hr, 0.83 TPY	40 CFR 60.672(a)
	EP-016	0.02 gr/dscf (0.05 g/ dscm)	5.66 lbs/hr, 24.78 TPY	40 CFR 60.672(a)
	EP-018 **Note (1)**	0.02 gr/dscf (0.05 g/ dscm)	0.05 lbs/hr, 0.23 TPY	40 CFR 60.672(a)
	EP-019	0.017 gr/dscf	1.89 lbs/hr, 8.3 TPY	Air Permit No. 1070039-015-AC **NOTE (2)**
	EP-022	0.02 gr/dscf (0.05 g/ dscm)	0.05 lbs/hr, 0.23 TPY	40 CFR 60.672(a)
	EP-024	N/A	1.08 lbs/hr, 4.73 TPY	

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POLL.	E.P.	EMISSION STANDARD/LIMIT		RULE
	EP-025 **Note (1)**	0.02 gr/dscf (0.05 g/ dscm)	0.05 lbs/hr, 0.23 TPY	40 CFR 60.672(a)
	EP-026	0.02 gr/dscf (0.05 g/ dscm)	2.14 lbs/hr, 9.39 TPY	40 CFR 60.672(a)
VE	EP-001	7% Opacity and 10% Fugitive		40 CFR 60.672(d)
	EP-003 **Note (1)**	7% Opacity and 10% Fugitive		40 CFR 60.672(a)
	EP-004	7% Opacity and 10% Fugitive		40 CFR 60.672(a)(b)
	EP-010	10% Opacity		40 CFR 60.672(b)
	EP-011	7% Opacity and 10% Fugitive		40 CFR 60.672(f)
	EP-019	7% Opacity and 10% Fugitive		40 CFR 60.672(a)
	EP-009	7% Opacity and 10% Fugitive		40 CFR 60.672(a)
	EP-018 **Note (1)**	7% Opacity and 10% Fugitive		40 CFR 60.672(f)
	EP-014	7% Opacity and 10% Fugitive		40 CFR 60.672(a)
	EP-016	7% Opacity and 10% Fugitive		40 CFR 60.672(a)
	EP-022	7% Opacity and 10% Fugitive		40 CFR 60.672(a)
	EP-024	15% Opacity		40 CFR 60.672(b)
	EP-025 **Note (1)**	7% Opacity and 10% Fugitive		40 CFR 60.672(a)
	EP-026	7% Opacity and 10% Fugitive		40 CFR 60.672(a)

Note (1) EU Nos. 003, 018 & 025: Normal operation of the EPs at these emission units is to vent into EU002, which requires a yearly EPA Method 5 and 9. Annually **EPA Method 22** is required for these units when they are operated such that emissions are vented apart from EU002 (inside of the building). **NOTE (2)** requested by Applicant to escape PSD.

[Air Permit No. 1070039-015-AC]

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Federal Excess Emissions:

A.6. Good Air Pollution Control Practices: 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)]

State Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision. This rule only applies to emissions limits specified by state regulations or by state permits. Specifically, this rule applies to Specific Condition **A.5. (EPt 004) and (EPt 019).**

A.7. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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 Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

A.8. Excess Emissions Prohibited: 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]

Test Methods and Procedures:

{Permitting note: Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.9. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

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A.10. Testing:

POLLUTANT	EMISSION POINT	METHOD	FREQUENCY	RULE
PM	EP-004, EP-019, EP-026	EPA 5	Annual	40 CFR 60.675(b)
VE	EP-004, EP014, EP-019, EP-024, EP-026	EPA 9	Annual	40 CFR 60.675(b)
	EU003 **NOTE (1)**, EP-009, EP-010,EP-011 **NOTE (2)**, EP-014 **NOTE (2)**, EP-016, **NOTE (1)** EP-022 & EP-025	EPA 22	Annual	40 CFR 60.675 **NOTE (2)**
	EP-004 & EP-019, EP-026	EPA 22	Weekly	See Specific **Condition A.5**

NOTE (1) EU003, 018 & 025: Normal operation for each of these EPs is to vent into EU002, which requires a yearly EPA Method 5 and 9. Annually **EPA Method 22** is required for these units when they are operated such that emissions are vented apart from EU002 (inside of the building).

[40 CFR 60.675]

NOTE (2) Exhibit no visible emissions **from the building** as determined by EPA Method 22.

A.11. Visible Emissions Test (EP004, EP019 & EP026): Visible Emissions test shall be conducted yearly. In addition, the permittee shall conduct a weekly EPA Method 22 visible emissions compliance test to ensure that emissions are not visible. The minimum observation period of the weekly EPA Method 22 test shall be twelve minutes. In the event that the weekly test indicates visible emissions, the permittee shall undertake corrective action as well as conduct a Method 9 test with a minimum observation period of sixty (60) minutes (as incorporated in Chapter 62-297, FAC). The permittee shall maintain records documenting that the weekly compliance testing has occurred. The records shall include color, duration, and density of the plume of any abnormal visible emissions detected, as well as the cause and corrective action taken for any abnormal visible emissions.

{Permitting note: It is presumed that the threshold of visibility for opacity is equal to 5%.}

[In accordance with the resolution between EPA and Lafarge North America, Inc. on May 9, 2002]

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Recordkeeping and Reporting Requirements:

A.12. Excess Emissions**:** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department Air Program immediately 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 Department.

[Rule 62-210.700(6), F.A.C.]

A.13. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

A.14. Federal Rule Requirements. In addition to the specific conditions listed above, these emissions units are also subject to the applicable requirements contained in, 40 CFR 60, Subpart A – General Provisions and 40 CFR 60 Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants.

[Rule 62-213.440, F.A.C.]

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Subsection B. This section addresses the following emissions unit(s).

These emission units are subject to NSPS requirements/standards in 40 CFR 60, Subpart UUU and 40 CFR 60 (Subpart A).

EU	Brief Description	Emission Point
002	Cage Mill Dryer System # 1 – Bag Filter	EP 002 **NOTE (1), NOTE (2)**
023	Cage Mill Dryer System #2– Bag Filter	EP 023 **NOTE (2)**

NOTE (1) EU-003, EU-025 and EU-018 duct to EP-002; however limits for these units are listed in the previous section (Subsection A).

NOTE (2) The Fabric filter's primary purpose is to recover product and return it to the process.

Emission Unit 002 (EU002) and emission unit 023 (EU 023) Cage Mill Dryer System # 1 and #2, Alstom Power Preheater manufactured by Raymond, September 10 2005. Each dryer is powered by 55MMBTU/hr natural gas fired burners. Emissions from the dryers are each controlled by separate dust collectors.

Permit No. 1070039-011-AC issued August 02, 2006 lowered allowable PM emission limits to .017 gr/dscf (facility's request to escape PSD).

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

Essential Potential to Emit (PTE) Parameters:

B.1. Permitted Capacity: The operation rates shall not exceed 55 MMBTU/hr natural gas.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

B.2. Method of Operation: These emissions units are permitted to use natural gas as fuel.

[Rule 62-210.200(PTE), F.A.C.; Permit No. 1070039-011-AC]

B.3. Hours of Operation**:** These emission units are allowed to operate continuously, i.e. 8760 hrs/yr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

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Unless otherwise specified, the averaging time(s) for Specific Condition **B.4** is based on the specified averaging time of the applicable test method.

B.4. Maximum Allowable Emission Rate for each EP: The permitted maximum allowable emission rate for each cage mill dryer system is as follows:

POLLUTANT	STANDARD/LIMIT		RULE
PATICULATE MATTER	(0.017 gr/dscf) **Note (1)**	7.58 1bs/hr, 33.19 TPY	40 CFR 60.732(a)
VISIBLE EMISSIONS	10% Opacity		40 CFR 60.732(b)

Note (1): Requested by the facility to escape PSD review.

Federal Excess Emissions:

B.5. Good Air Pollution Control Practices: 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)]

State Excess Emissions

Rule 62-210.700 (Excess Emissions), F.A.C. cannot vary any requirement of an NSPS, NESHAP or Acid Rain program provision. This rule only applies to emissions limits specified by state regulations or by state permits. Specifically, this rule applies to Specific Condition **B.4**. (Particulate Matter emissions only).

B.6. Excess Emissions Allowed. Excess emissions resulting from malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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 Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

B.7. Excess Emissions Prohibited: 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]

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Test Methods and Procedures

{Permitting note: Table 2, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.8. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.9.

POLLUTANT	METHOD	FREQUENCY	RULE
PARTICULATE MATTER	EPA 5	Annual	40 CFR 60.736(b)
VISIBLE EMISSIONS	EPA 9	Annual	40 CFR 60.736(b)
	EPA 22	Weekly	See Specific Condition B.5.

B.10. **Visible Emissions:** Visible Emissions test shall be conducted yearly. In addition, the permittee shall conduct a weekly EPA Method 22 visible emissions compliance test to ensure that emissions are not visible. The minimum observation period of the weekly EPA Method 22 test shall be twelve minutes. In the event that the weekly test indicates visible emissions, the permittee shall undertake corrective action as well as conduct a Method 9 test with a minimum observation period of sixty (60) minutes (as incorporated in Chapter 62-297, FAC). The permittee shall maintain records documenting that the weekly compliance testing has occurred. The records shall include color, duration, and density of the plume of any abnormal visible emissions detected, as well as the cause and corrective action taken for any abnormal visible emissions.

{Permitting note: It is presumed that the threshold of visibility for opacity is equal to 5%.}

[In accordance with the resolution between EPA and LaFarge North America, Inc. on May 9, 2002]

Continuous Monitoring Requirements

B.11. **COM:** Install, calibrate, maintain, and operate a continuous monitoring system to measure and record the opacity of the emissions discharged into the atmosphere from the control device.

[40 CFR 60.734(a)]

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Recordkeeping and Reporting Requirements:

B.12. Excess Emissions**:** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department Air Program immediately 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 Department.

[Rule 62-210.700(6), F.A.C.]

B.13. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

Other Requirements

B.14. Federal Rule Requirements: In addition to the specific conditions listed above, these emissions units are also subject to the applicable requirements contained in 40 CFR 60, Subpart A – General Provisions and 40 CFR 60 Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries

[Rule 62-213.440, F.A.C.]

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Subsection C. This section addresses the following emissions unit(s).

EU	Brief Description	Emission Point
005	Imp Mill Air Cooling System A	EP-005
006	Stucco Silo A	EP-006 - Indoor
007	Starch Silo	EP-007
008	Sawing Systems/Dunnage Machines	EP-016 – Indoor (See EU016)
013	Wallboard Dryer (4 Natural Gas Burners)	EP-013A
		EP-013B
017	Additives System and Pin Mixer	EP-017 - Indoors
020	Imp Mill Air Cooling System B	EP-020
021	Stucco Silo B	EP-021- Indoor
027	Imp Mill Air Cooling System C	EP-027

These Emission Units are subject to Rule 62-296.320(4), F.A.C.

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

Essential Potential to Emit (PTE) Parameters:

C.1. Permitted Capacity:

EU	Brief Description	Capacity
005	Imp Mill Air Cooling System A	20 TPH stucco
006	Stucco Silo A	690 tons
007	Starch Silo	5,270 cubic feet
008	Sawing Systems/Dunnage Machines	N/A
013	Wallboard Dryer (4 Natural Gas Burners)	186 MMBtu/hr
017	Additives System and Pin Mixer	N/A
020	Imp Mill Air Cooling System B	20 TPH stucco
021	Stucco Silo B	690 tons
027	Imp Mill Air Cooling System C	55 tons/hr

C.2. Hours of Operation: These emission units are allowed to operate continuously, i.e. 8760 hrs/yr.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

C.3. Method of Operation- Emissions Unit No. 013: This emissions unit is permitted to use natural gas as fuel.

[Rule 62-210.200(PTE), F.A.C.]

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Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

Unless otherwise specified, the averaging time for Specific Condition **C.4**.is based on the specified averaging time of the applicable test method.

C.4. Permitted Maximum Allowable Emission Rate: The permitted maximum allowable emission rate for each pollutant is as follows:

POLLUTANT	EU	EMISSION STANDARD/LIMIT		RULE
Particulate Matter	EP-005	0.02 gr/dscf [48,000 dscfm]	8.23 1bs/hr, 36.04 TPY (each)	**Note (1)**
	EP-027	0.02 gr/dscf [27,000 dscfm]	4.75 lbs/hr, 20.8 TPY	**Note (1)**
	EP-008	0.02 gr/dscf	4.11 lbs/hr, 18.02 TPY	**Note (2)**
	EP-017	0.03 gr/dscf [8,000 dscfm]	2.06 lbs/hr, 9.01 TPY	**Note (1)**
Particulate Matter	EP-020	0.017 gr/dscf	6.99 lb/hr, 30.63 tpy	Permit No. 1070039-015-AC
Visible Emissions	EP-006, EP-007, EP-017, EP-021, EP-008	5% Opacity		62-297.620(4), F.A.C. Permit No. 1070039-001-AC Permit No. 1070039-004-AC
	EP-005, EP-013 A/B, EP-020, EP-027	20% Opacity		62-296.320(4)(b), F.A.C. Permit No. 1070039-011-AC Permit No. 1070039-001-AC Permit No. 1070039-004-AC

Note (1): Limit requested by the facility to escape PSD review.
Note (2): EU008 (4.11 lbs/hr, 18.02 TPY) vents to EP016.

State Excess Emissions:

C.5. Excess Emissions Allowed. Excess emissions resulting from startup, shutdown, or malfunction shall be permitted provided that best operational practices to minimize emissions are adhered to and 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 Department for longer duration.

[Rule 62-210.700(1), F.A.C.]

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C.6. Excess Emissions Prohibited. 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]

Test Methods and Procedures:

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

C.7. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit.

[Rule 62-297.310, F.A.C.]

C.8. Testing Requirements:

POLLUTANT	EU	METHOD	FREQUENCY	RULE
VISIBLE EMISSIONS	EP-005, EP-020, EP-013A/B, EP-007, EP-027	EPA 9	Annual	62-296.320(4)(b)
	EP-006, EP-017, EP-021	**NOTE (2)**	-----	-----
	EP-005, EP-020	EPA 22	Weekly	See Specific Condition C.5.
	EP-008	**NOTE (3)**		
PARTICULATE MATTER	EP 005, EP-020	EPA 5	Annual	**NOTE (1)**

Note (1): Test required due to the requested Particulate Matter maximum allowable emission rate to escape PSD review.

Note (2): These emission units are located indoors and testing may be required. DEP reserves the right to require the modification of construction and operation permits to accommodate testing requirements based on EPA, 04/04/2003 letter and any additional instruction from EPA and /or the Division of Air. If such determination is made, the permittee will be required to submit all necessary permit applications and publish required "Public Notices".

Note (3): EU008 vents to EP-016.

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C.9. Visible Emissions Test: (EP005, 020 and 027) Visible Emissions test shall be conducted yearly. In addition, the permittee shall conduct a weekly EPA Method 22 visible emissions compliance test to ensure that emissions are not visible. The minimum observation period of the weekly EPA Method 22 test shall be twelve minutes. In the event that the weekly test indicates visible emissions, the permittee shall undertake corrective action as well as conduct a Method 9 test with a minimum observation period of sixty (60) minutes (as incorporated in Chapter 62-297, FAC). The permittee shall maintain records documenting that the weekly compliance testing has occurred. The records shall include color, duration, and density of the plume of any abnormal visible emissions detected, as well as the cause and corrective action taken for any abnormal visible emissions.

{Permitting note: It is presumed that the threshold of visibility for opacity is equal to 5%.}

[In accordance with the resolution between EPA and Lafarge North America, Inc. on May 9, 2002]

Recordkeeping and Reporting Requirements:

C.10. Excess Emissions**:** In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Department Air Program immediately 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 Department.

[Rule 62-210.700(6), F.A.C.]

C.11. Other Reporting Requirements. See Appendix RR, Facility-Wide Reporting Requirements, for additional reporting requirements.

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Subsection D: This section addresses the following emissions unit(s).

EU No.	Description	Model No	HP	Fuel Type	Year built
028	Perkins Emergency generator	2076/1800	219	diesel	2000
029	Perkins Emergency generator	1797/1500	166	diesel	2000
030	John Deere Water Pump	6081AF001	275	diesel	2000

The engines are subject to 40 CFR 63 40 CFR 63 Subpart ZZZZ National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines. In accordance with the definitions of this subpart, the engines are existing, stationary RICE.

This facility operates two Perkins diesel fired emergency generators and a John Deere diesel fire water pump engine all three engines were manufactured and installed in 2000 and are subject to regulation under 40 CFR 63Subpart ZZZZ, - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

D.1. NESHAP, 40 CFR 63 Subpart ZZZZ Applicability: These diesel engines are classified as existing, stationary Reciprocating Internal Combustion Engines (RICE) and shall comply with applicable provisions of 40 CFR 63 Subpart ZZZZ. These engines are classified as Emergency stationary RICE and are used to pump water for fire suppression.

[40 CFR 63.6675(def); 40 CFR 63.6585(a) & (c); 40 CFR 60.6590(a)(1)(iii)]

D.2. 40 CFR 63, Subpart A-General Provision: Table 8 of 40 CFR 63 Subpart ZZZZ, shows which parts of the General Provisions in §§63.1 through 63.15 are applicable.

[40 CFR 63.6665]

D.3. Compliance Date: The owner or operator shall comply with the applicable emission limitations and operating limitations of 40 CFR 63 Subpart ZZZZ no later than May 3, 2013.

[40 CFR 63.6595(a)(1)]

D.4. Method of Operation - Emergency Stationary RICE: The emergency stationary RICE shall be operated according to the requirements in paragraphs (i) through (iii) of this Condition. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (i) through (iii) of this Condition, is prohibited. If you do not operate the engine according to the requirements in paragraphs (i) through (iii) of this Condition, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and will need to meet all requirements for non-emergency engines.

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

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Condition D.4. Continued:

(ii) The emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. 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 year.

(iii) The emergency stationary RICE may be operated up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (iii), as long as the power provided by the financial arrangement is limited to emergency power.

[40 CFR 63.6640(f)(1)(i)- (f)(1)(iii)]

<u>Emission standards</u>

D.5. Each engine shall comply with the following emission standards:

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
c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[1]Sources have the option to utilize an oil analysis program as described in Condition D.6. in order to extend the specified oil change requirement.

[40 CFR 63.6603(a), Table 2d]

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D.6. Oil Analysis Program Option. The owner or operator has the option of utilizing an oil analysis program in order to extend the specified oil change requirement stated in Condition D.5. The oil analysis must be performed at the same frequency specified for changing the oil in Condition D.5. 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.

[40 CFR 63.6625(i)]

General compliance requirements

D.7. You must be in compliance with the emission limitations and operating limitations in 40 CFR 63 Subpart ZZZZ that applies at all times.

[40 CFR 63.6605(a)]

D.8. At all times you 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 you 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 Administrator 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.

[40 CFR 63.6605(b)]

D.9. The stationary RICE and after-treatment control device (if any) shall be operated and maintained according to the manufacturer's emission-related written instructions or develop 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.

[40 CFR 63.6625(e) & (e)(3)]

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D.10. A non-resettable hour meter shall be installed if one is not already installed.

[40 CFR 63.6625(f)]

D.11. The engine's time spent at idle during startup and the engine's startup time to a period needed for appropriate and safe loading of the engine shall be minimized, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in 40 CFR 63 Subpart ZZZZ Tables 1a, 2a, 2c, and 2d apply.

[40 CFR 63.6625(h)]

Monitoring requirements

D.12. You must demonstrate continuous compliance with each emission limitation and operating limitation in Condition D.5. according to methods specified below:

a. 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.

[40 CFR 63.6640(a), Table 6, No. 9.a.i.& ii]

Recordkeeping Requirements

D.13. Records of the maintenance conducted on the stationary RICE shall be kept in order to demonstrate that the stationary RICE and after-treatment control device (if any) is operated and maintained according to the owner or operator's own maintenance plan.

[40 CFR 63.6655(e)(2)]

D.14. Records of the hours of operation of the engine shall be kept 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-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.

[40 CFR 63.6655(f)]

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D.15. Records: Records shall meet the following:

(a) Records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), each record shall be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) Each record shall be kept 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 §63.10(b)(1).

[40 CFR 63.6660]

Reporting requirements

D.16. Each instance shall be reported in which each emission limitation or operating limitation in Condition D.5. is not met. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650.

[40 CFR 63.6640(b)]

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SECTION IV APPENDICES.

The Following Appendices Are Enforceable Parts of This Permit:

Appendix A, Glossary.
Appendix I, List of Insignificant Emissions Units and/or Activities.
Appendix NESHAP, 40 CFR 63 Subpart A – General Provisions.
Appendix NESHAP, 40 CFR 63 Subpart ZZZZ
Appendix NSPS, 40 CFR 60 Subpart A – General Provisions.
Appendix NSPS, 40 CFR 60 Subpart OOO
Appendix NSPS, 40 CFR 60 Subpart UUU
Appendix RR, Facility-wide Reporting Requirements.
Appendix TR, Facility-wide Testing Requirements.
Appendix TV, Title V General Conditions.
Appendix U, List of Unregulated Emissions Units and/or Activities

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REFERENCED ATTACHMENTS.

The Following Appendices Are Attachments Are Included for Applicant Convenience

Appendix H-1, Permit History/ID Number Changes
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Table 1-1, Summary of Air Pollutant Standards and Terms.
Table 2-1, Summary of Compliance Requirements.
Statement of Basis

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