*** DRAFT PERMIT ***

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PERMITTEE

The QUIKRETE Companies
dba QUIKRETE of Pensacola
Post Office Box 510
Bagdad, Florida 32530-0510

Authorized Representative:
Mr. Shane Scoggins, Plant Manager

Air Permit No. 1130031-011-AC
Permit Expires: Date
QUIKRETE Milton Facility
Minor Source After-the-Fact Air Construction Permit
Project Name: Packaging Line Modification

This is the final after-the-fact air construction permit, which authorizes a modification to construction permit 1130031-009-AC with the re-naming and modification to the packaging lines to add a cement packer to line #2. The work was conducted at the QUIKRETE Milton site, which is a concrete dry mix packaging plant (Standard Industrial Classification No. 3272 and 3295). The facility is located in Santa Rosa County at 7101 Windwood Lane in Milton, Florida. The UTM coordinates are Zone 16, 497.1 km East and 3383.5 km North. As noted in the Final Determination provided with this final permit, (no changes / only minor changes and clarifications) were made to the draft permit.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

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 construction 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. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C., and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C., for the Prevention of Significant Deterioration (PSD) of Air Quality.

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 Pensacola, Florida

(DRAFT)

_____ _____

Rick Bradburn, Air Program Administrator (Date)

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) 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.

Shane Scoggins, QUIKRETE: sscoggins@quikrete.com
K. C. Sviglin, P.E.; Pensacola P.O.C.: pensacolapoc@gmail.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

Existing Facility

This facility is a concrete dry mix packaging plant consisting of two cement/fly ash storage silos, five aggregate storage silos, and a rotary drum dryer and packaging operation. The storage silos contain cement/fly ash, and are pneumatically loaded from truck transporters. Aggregate (coarse sand and gravel) is handled in storage silos A through E. The rotary drum dryer is fueled by either natural gas or liquid propane (LP).

The existing facility consists of the following emissions units.

Facility ID No. 1130031	
ID No.	**Emission Unit Description**
001	Concrete Products Processing/Packaging (baghouses #1-6, cyclone and scrubber)

Proposed Project

This after-the-fact construction permit is a result of inspections that noted a cement packer was added to one of the packaging lines and this additional process is not covered by the current permit. This permit modifies permit 1130031-009-AC (that was incorporated into operating permit 1130031-010-AO), with an authorization to install equipment necessary to add a cement packer to line #2.

This construction project will also rename the following:

FROM:	TO:
Premix concrete packaging (Line 1)	Packaging Line #1 *{Packaging premixed concrete only}*
Sand/Aggregate packaging only (Line 2)	Packaging Line #2 *{Package premixed concrete , cement/flyash and sand}*

Packaging Line #1 remains dedicated to packaging premixed concrete only. Packaging Line #2 is used to package premixed concrete cement/flyash and sand; it is equipped with two packers, one used to meter cement and one used to meter sand. Packaging Line #2 can also be used to package premixed concrete in case packaging Line #1 malfunctions. Packaging Line #2 however is not equipped with premixed concrete packager; instead mixture is metered by Line #1 packer and conveyed through fully enclosed conveyor to Packaging Line #2.

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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (DRAFT)

1. Permitting Authority: The permitting authority for this project is the Northwest District Air Resource Management Program, Florida Department of Environmental Protection (Department). The District's mailing address is 160 W. Government Street, Suite 308, Pensacola, Florida 32502-5740. All documents related to applications for permits to operate an emissions unit shall be submitted to the District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the District Office at the above address or nwdair@dep.state.fl.us.

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; and

    d. Appendix D. Common Testing Requirements. (if applicable)

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, 62-296 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: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

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

    (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

    [Rule 62-212.400(12), F.A.C.]

A. Concrete Products Processing/Packaging

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
001	Concrete Products Processing/Packaging (baghouses, cyclone and scrubber)

The emissions unit is a concrete dry mix packaging plant consisting of two cement/fly ash storage silos, five aggregate storage silos, a rotary drum dryer (fueled by either natural gas or liquid propane) and packaging operation. The two storage silos store cement/fly ash and are pneumatically loaded from truck transporters. Particulate emissions are controlled by the following:

Cement/Flyash unloading into storage silos
- Silo #1 – Baghouse #1 – Flexkleen, Model 18BVEC1611
- Silo #2 – Baghouse #3 – Flexkleen, Model 18BVEC1611

Aggregate/sand screening & delivering to storage silos
- Silo A, B – Baghouse #4 – American Air Filter, Model FP730022
- Silo C, D, E – Baghouse #5 – American Air Filter, Model FP730022

Packaging Lines
- Packaging Line #1 – Baghouse #2 – Manufactured by Fuller, Type 3
- Packaging Line #2 – Baghouse #6 – Manufactured by ASTEC Industries, Inc.

Drying Operation
- Particulate emissions from the rotary drum dryer are controlled by a dry cyclone followed by a baffle type wet scrubber.

Packaging Line #2 is used to package premixed concrete cement/flyash and sand; it is equipped with two packers, one used to meter cement and one used to meter sand. Packaging Line #2 can also be used to package premixed concrete in case packaging Line #1 malfunctions. Packaging Line #2 however is not equipped with premixed concrete packager; instead mixture is metered by Line #1 packer and conveyed through fully enclosed conveyor to Packaging Line #2.

EQUIPMENT

Equipment

1. Equipment Name: The permittee is authorized to install equipment necessary for a modification to the packaging lines to add a cement packer to line #2. [Application No. 1130031-011-AC]

PERFORMANCE RESTRICTIONS

2. Permitted Capacity: The maximum allowable packaging rates are defined according to the table below:

Material Processed	Process Rate
Packaging Line #1 *When packaging only premixed concrete, Line #2 not running.*	45 tons per hour
Packaging Line #2 *When packaging only premixed concrete, cement/flyash or sand, Line #1 not running.*	20 tons per hour
Packaging Line #1and Line #2 – Combined *Lines #1 and #2 operating simultaneously*	55 tons per hour
Sand/Aggregate Drum Dryer Process Rate	55 Tons per hour

These limits are averaged each day over the day's actual production time.

[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; Department document dated December 4, 2006; permit 1130031-009-AC and, Application No. 1130031-011-AC]

3. Authorized Fuel: The rotary drum dryer shall be fueled with either natural gas or liquid propane only. [Rule 62-210.200(PTE), F.A.C., permit 1130031-009-AC and Application No. 1130031-011-AC]

4. Restricted Operation: The hours of operation of shall not exceed 6,000 hours per year. [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C., and permit 1130031-009-AC]

EMISSIONS STANDARDS

5. Emissions Standards:

   a. The silos, hopper and other storage, packaging or conveying equipment shall be controlled to the extent necessary to limit visible emissions to 5 percent opacity. This limit is applicable to all baghouse exhausts in lieu of PM testing. [Rule 62-296.414(1), F.A.C.; permit 1130031-009-AC and Application No. 1130031-011-AC]

   b. Particulate emissions from the rotary drum dryer shall not exceed 32.87 pounds per hour at a maximum operating rate of 55 tons per hour. (At lesser operating rates, the emissions shall not exceed that given by the appropriate process weight equation.) [Rule 62-296.320(4)(a), F.A.C., permit 1130031-009-AC and Application No. 1130031-011-AC]

TESTING REQUIREMENTS

6. Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for Particulate Matter (PM) and Visible Emissions (VE). Emissions tests shall be conducted on each stack or vent emission unit. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. [Rules 62-4.070(3) and 62-297.310(7)(a)1, F.A.C.]

7. Annual Compliance Tests: During each federal fiscal year (October 1 to September 30), the emissions unit shall be tested to demonstrate compliance with the emissions standards for PM and VE. [Rule 62-297.310(7)(a)4, F.A.C.]

8. The Permittee shall conduct VE testing while loading the silos at a rate that is representative of the normal silo loading rate. The normal silo loading rate shall be 25 TPH and silo loading shall occur in less than one hour. The rotary drum dryer shall be PM tested within 90% - 100% of the maximum allowable operating rate of 55 tons of aggregate per hour. Each test report shall state the actual process rate during emissions testing. Each VE test shall be conducted for 30 minutes. [Rule 62-4.070(3) and 62-297.310(7), F.A.C.]

9. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Notification may be sent via e-mail to nwdair@dep.state.fl.us. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9, F.A.C.]

10. Test Methods: Required tests shall be performed in accordance with the following reference methods.

Method	Description of Method and Comments
5	Method for Determining Particulate Matter Emissions
9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rules 62-204.800 and 62-297.401, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800, 62-297.100 and 62-297.401, F.A.C.; Appendix A of 40 CFR 60]

MONITORING REQUIREMENTS

11. The permittee shall keep on-site records of the facility operating times and of the individual production rates for the aggregate dryer, concrete products and sand/aggregate packaging operations on a daily basis for a period of at least three years. Records should include such items as tons of each individual product processed, hours of operation for each packaging line, rotary drum dryer tons per hour of aggregate processed, date and time of recording, and other items deemed relevant to permit requirements. In addition, Permittee shall also record maintenance repair actions (routine and non-routine) and malfunctions on any pollution control equipment. These records along with the required testing shall be used to provide reasonable assurance that the facility is complying with the permit-imposed operating and emissions limits. These records shall be made available for Department inspection upon request.
[Rule 62-4.160, F.A.C., permit 1130031-009-AC and Application No. 1130031-011-AC]

RECORDS AND REPORTS

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. [Rule 62-297.310(8), F.A.C.]