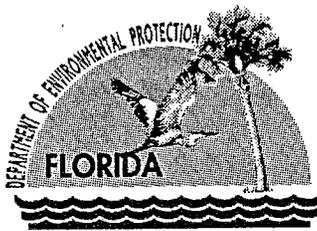


Lone Star Industries, Inc.  
Pensacola Cement Terminal  
Facility ID No.: 1130169  
Santa Rosa County

Air Operation Permit  
**Permit No.:** 1130169-002-AO

Permitting and Compliance Authority  
Department of Environmental Protection  
Northwest District Office  
160 Governmental Center  
Pensacola, FL 32501-5794  
Telephone: 850/595-8364  
Fax: 850/595-8096

[electronic file name: 1130169-002-ao.doc]



Jeb Bush  
Governor

# Department of Environmental Protection

Northwest District  
160 Governmental Center  
Pensacola, Florida 32501-5794

David B. Struhs  
Secretary

Permittee:  
Lone Star Industries, Inc.

Permit No.: 1130169-002-AO  
Facility ID No.: 1130169  
SIC Nos.: 32  
Project: Air Operation Permit

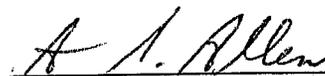
This permit is for the operation of the Pensacola Cement Terminal located at 6266 DaLisa Road in Bagdad, Santa Rosa County; UTM Coordinates: Zone 16, 494.17 km East and 3383.49 km North; Latitude: 30° 35' 08" North and Longitude: 87° 03' 41" West.

STATEMENT OF BASIS: This 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 and 62-210. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

**Referenced attachments made a part of this permit:**  
Appendix G-1, General Conditions

**Effective Date: October 12, 2000**  
**Renewal Application Due Date: August 12, 2005**  
**Expiration Date: October 12, 2005**

**FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION**

  
\_\_\_\_\_  
**ANDREW S. ALLEN**  
Air Permitting Supervisor

ASA/om

"More Protection, Less Process"

Printed on recycled paper.

Air Operation Permit  
Permit No.: 1130169-002-AO

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**Section I. Facility Information.**

**Subsection A. Facility Description.**

This permit authorizes the operation of a cement terminal for the receipt, storage and movement of cement. The facility includes various related activities consisting of bulk cement railcar gravity unloading to an enclosed bucket elevator, two elevated storage bins and gravity loading into transfer trucks. The pollutant of concern is particulate matter which is controlled by fabric baghouses and enclosures. There are no facility-specific state or federal environmental rules which govern this type of facility.

Based on the permit application received July 5, 2000, this facility is not a major source of hazardous air pollutants (HAPs).

**Subsection B. Summary of Emissions Unit ID No. and Brief Description.**

**E.U. ID**

<b><u>No.</u></b>	<b><u>Brief Description</u></b>
001	Baghouses associated with Cement Terminal Operations

*Please reference the Permit No., Facility ID No., and appropriate Emissions Unit ID No. on all correspondence, test report submittals, applications, etc.*

**Subsection C. Relevant Documents.**

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are on file with permitting authority:

- Permit Application received July 5, 2000
- Additional Information Request dated July 25, 2000
- Additional Information Response received September 5, 2000
- Additional Information Response received September 7, 2000
- Additional Information Response received September 13, 2000

**Section II. Facility-wide Conditions.**

**The following conditions apply facility-wide:**

1. APPENDIX G-1, GENERAL CONDITIONS, is a part of this permit.
2. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2), F.A.C.]
3. General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C.  
[Rules 62-296.320(4)(b)1. & 4., F.A.C.]
4. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility may include:
  - Maintenance of roads, parking areas, and yards.
  - Application of water, or environmentally safe dust-suppressant chemicals when necessary to control emissions.
  - Removal of particulate matter from roads and other paved areas under control of the owner or operator of the facility to mitigate reentrainment, and from building or work areas to reduce airborne particulate matter.
  - Use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck.[Rule 62-296.320(4)(c)2., F.A.C.; Construction Permit Application 11/3/98]
5. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.  
[Rule 62-213.440, F.A.C.]
6. At least sixty days prior to the expiration date of this operation permit, the Permittee shall submit two permit renewal applications using the current version of the renewal form along with the processing fee established in FAC Rule 62-4.050(4) to the Northwest District office of the Department.  
[Rule 62-4.090, F.A.C.]

7. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection  
Northwest District Office  
160 Governmental Center  
Pensacola, Florida 32501-5794  
Telephone: 850/595-8364, press 7; Fax: 850/595-8096

8. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, extension 1220, day or night, and for emergencies involving a significant threat to human health or the environment is (800) 320-0519. For routine business, telephone (850) 595-8364, then press 7, during normal working hours.  
[Rules 62-210.700 and 62-4.130, F.A.C.]

### Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit.

#### E.U. ID

#### No.            Brief Description

001            Baghouses associated with Cement Terminal Operations

This emission unit is comprised of all activities associated with the operation of a cement terminal. Cement is unloaded by gravity from railcars and is conveyed by an enclosed bucket elevator to two elevated storage bins. Loading into transfer trucks from the storage bins is done by gravity feed. Emissions are controlled by two filter baghouses, manufactured by Dust Control & Loading Systems, Inc., for particulate matter associated principally with the railcar unloading, silo storage and blending, and transfer truck loading activities. The facility is located in an attainment area, and is not subject to any facility specific emission limits or performance standards, but is subject to the General Particulate Emission Limiting Standards of 62-296.320(4)(b), F.A.C.

**The following specific conditions apply to the emissions unit listed above:**

#### Essential Potential to Emit (PTE) Parameters

**A.1. Capacity.** The facility is limited to a maximum of 300,000 tons per year cement storage and handling at this facility.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and Lone Star letter dated September 7, 2000]

**A.2. Hours of Operation.** The facility may operate continuously i.e. 8760 hours per year.  
[Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

#### Testing

**A.3. Visual Emissions tests** using EPA method 9 are required to show compliance with the General Particulate Emission Limiting Standard (20% opacity) identified in **Section II Item 3**. The test results must provide reasonable assurance that the source is capable of compliance at the railcar unloading/storage bin loading and transfer truck loading rates as stated in Specific Condition A.5. Such tests shall be conducted **annually during the period of June 1 to September 1**. If the first three annual tests (including the initial compliance test) average 5% with no reading exceeding 10%, the permittee may request that the frequency of testing be reduced to once during the final year of each permit term and submitted with the application for operating permit renewal. The Department shall be notified at least 15 days prior to testing to allow witnessing. Results shall be submitted to the Department within 45 days after testing.  
[Rules 62-4.070, 62-297.310(7), and 62-297.401(9), F.A.C.]

A.4. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7) F.A.C. Other test methods and alternate compliance procedures may be used only after prior Departmental approval has been obtained in writing.  
[Rules 62-297.310(7) and 62-297.620(1), F.A.C.]

A.5. Future testing of emissions will be performed at the following rates: hourly rate for unloading the railcars into the storage bins is *approximately* 122 tons per hour, and for loading into the transfer trucks is *approximately* 175 tons per hour. These approximate rates are to be used as a target for testing to determine that the pollution control equipment is functioning properly and are not to be used as a basis for determining if the permittee is operating in violation of the permit. Variables such as humidity, temperature, product mixture ratios, etc. make it impractical to define precise operating rates. (Rates are determined by total material transferred divided by the time of product flow.)  
[Rules 62-297.310(2) and 62-4.070, F.A.C.]

#### **Monitoring and Recordkeeping**

A.6. The permittee will monitor the facility and record information according to the operations and maintenance (O&M) plan submitted to the Department with the application for an operating permit received on July 5, 2000. The information recorded will be used to demonstrate compliance with the established maximum limits for the annual total of cement processed through the facility. The plan also describes routine maintenance actions that will be taken to insure the proper operation of the pollution control equipment as well as what actions will be taken in the event of a failure of the pollution control equipment. The information recorded will be made available for inspection upon request by Department personnel.  
[Rule 62-4.070(3), F.A.C.]

**Permit No.: 1130169-002-AO**

Appendix G-1

**GENERAL CONDITIONS:**

Page 1 of 2

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "permit conditions", and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:
  - a. Having access to and copying any records that must be kept under the conditions of this permit;
  - b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and,
  - c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.Reasonable time may depend on the nature of the concern being investigated.
8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:
  - a. A description of and cause of noncompliance; and
  - b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent

**Permit No.: 1130169-002-AO**

Appendix G-1

GENERAL CONDITIONS:

Page 2 of 2

recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.

11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 62-4.120 and 62-730.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurement;
- the person responsible for performing the sampling or measurement;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

14. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.