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Boral Material Technologies, Inc.
Conrad Yelvington Distributors, Inc.
Facility ID No.: 7775099
Escambia County

Air Construction Permit
Permit No.: 7775099-003-AO

Permitting and Compliance Authority:
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
Telephone: 850/595-8364
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Air Construction Permit
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Table of Contents

Section	Page Number
Placard Page	1
I. Facility Information	2
A. Facility Description.	
B. Summary of Emissions Unit ID No(s). and Brief Description(s).	
C. Relevant Documents.	
II. Facility-wide Conditions	3
III. Emissions Unit(s) and Conditions	
A. 001 Baghouse	5
Appendices	
Appendix G-1, General Conditions	
Attachment 1, General Housekeeping Rules	



Jeb Bush
Governor

Department of Environmental Protection

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

Permittee:
Boral Material Technologies, Inc.

Permit No.: 7775099-003-AO
Facility ID No.: 7775099
SIC Nos.: 5032
Project: Air Construction Permit

This permit is for the operation of a flyash transfer station at Conrad Yelvington Distributors, Inc., located at 116 East Fairfield Drive in Pensacola, Escambia County; UTM Coordinates: Zone 16, 478.59 km East and 3368.77 km North.

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, 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
Attachment 1, General Housekeeping Rules

Effective Date: September 28, 2000
Expiration Date: September 28, 2005

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

Ed K. Middleswart, P.E.
Air Program Administrator

EKM/bkc

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Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of a flyash transfer station. Flyash delivered to the site via railroad cars is pneumatically unloaded at a maximum rate of 50 tons per hour from the railroad cars into a 100-ton silo. The flyash is gravity fed from the silo into tanker trucks at a maximum loading rate of 100 TPH. The silo is equipped with a baghouse with an air to cloth ratio of 4.2 to 1. The baghouse vent fan will operate during both the loading of the silo from railcars and the unloading of flyash into truck tankers. Air displaced during truck tanker loading will be moved to the top of the silo through an 8-inch pipe.

The baghouse is a Wheelabrator cartridge type, Model 36, size 33. It has six filter cartridges with a total of 520 SF of cloth. The baghouse efficiency is 99.9%. Compressed air pulsation is used to clean filters. The vent fan has a 2,200 CFM, which results in an air to cloth ratio of 4.2 to 1.

Based on the permit application received September 14, 2000, this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U.

ID No.

Brief Description

001

Baghouse associated with flyash transfer site operations

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). 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:

Operation Permit Application received September 14, 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 that 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. Special Compliance Tests. When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it may require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Department.
[Rule 62-297.310(7)(b), F.A.C.]
5. General Pollutant Emission Limiting Standards. Emissions of Unconfined Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: All fugitive dust generated at this site shall be adequately controlled by good housekeeping practices such as periodic sweeping and/or vacuuming of roads, parking areas, yards and work areas, and application of dust suppressants to roads or yards as needed. Fly ash will not be used as paving on roads and yards. All flyash transfer systems must be totally enclosed. Permittee will protect flyash dust transfer points and transport and storage containers from wind action that might make flyash airborne. The General Housekeeping Rules in attachment 1 are incorporated in and made a part of this permit.
[Rules 62-296.320(4)(c)2. and 62-4.070, F.A.C., Operation permit application received September 14, 2000]

6. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include:

Paving and maintenance of roads, parking areas, and yards.

Application of asphalt, water, or other dust suppressants to unpaved roads, yards, and similar activities.

Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent reentrainment, and from buildings or work areas to prevent particulate from becoming airborne.

Landscaping or planting of vegetation.

Enclosure or covering of conveyor systems.

[Rule 62-296.320(4)(c)2., F.A.C.]

7. The rail car blower shall be interlocked with the stop fill level switch to prevent silo overfilling. The automatic silo discharge valve will be interlocked with the silo vent fan so that unloading flyash from the silo will not be permitted unless the vent fan for the baghouse is operating. The rail car blower will be interlocked with the same silo vent fan to keep the blower from starting or operating if the silo vent fan is off.

[Construction permit 777-5099-002-AC issued November 18, 1999 and amended February 29, 2000]

8. 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.]

9. The permittee shall submit all compliance-related notifications and reports required by this permit to the Department's Northwest District office.

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794

10. 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(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
001	Baghouse associated with flyash transfer site operations

This emission unit consists of a filter baghouse for particulate control associated with the operation of a flyash terminal. The baghouse vent fan will operate during both the loading of the silo from railcars and the unloading of flyash into truck tankers

The baghouse is a Wheelabrator cartridge type, Model 36, size 33. It has six filter cartridges with a total of 520 SF of cloth. The baghouse efficiency is 99.93%. Compressed air pulsation is used to clean filters. The vent fan has a 2,200 CFM, which results in an air to cloth ratio of 4.2:1.

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The silo has a maximum storage capacity of 100 tons. The maximum rate at which flyash may be off loaded from the silo into truck tankers shall not exceed 100 TPH. The maximum rate at which flyash may be off loaded from the railroad car into the silo shall not exceed 50 TPH.

[Rules 62-4.160(2) and 62-210.200, F.A.C., Construction permit 777-5099-002-AC issued November 18, 1999 and amended February 29, 2000]

A.2. Methods of Operation.

A.2.a. The flyash transfer operation shall be monitored for flyash emissions from the complete system, including but not limited to the baghouse, pressure release valves and flexible hose connectors. Visible and audible checks will be made to ensure proper system operation. In the event of a malfunction or detection of visible or audible problems, operation will cease immediately and not be resumed until any problems are resolved. Permittee shall attend to completely removing any flyash spills promptly and effectively. Permittee shall periodically check system and components for wear, corrosion, proper sealing and flyash build-up. Permittee shall take appropriate action to ensure system does not allow flyash to escape.

[Rules 62-4.070, 62-4.160(2), and 62-296.320(4)(c), F.A.C.]

A.2.b. The owner or operator shall operate the facility so as to maintain a normal pressure drop through the baghouse. A Magnehelic pressure differential gauge shall be used. If any pressure reading below 1" or above 5" of H₂O occurs, operation of the facility shall be terminated until the facility can be inspected and any deficiency corrected.

[Rule 62-4.160(2), F.A.C, Construction permit 777-5099-002-AC issued November 18, 1999 and amended February 29, 2000]

A.3. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.

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

Emission Limitations and Standards

A.4. The baghouse exhaust vent shall have an opacity limit of less than 5%.

[Rules 62-297.620 and 62-4.070, F.A.C., Construction permit 777-5099-002-AC issued November 18, 1999 and amended February 29, 2000]

Test Methods and Procedures

A.5. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. 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.6. Testing of emissions shall be conducted with the source operating at capacity while flyash is being loaded into the silo and simultaneously outloaded into tanker trucks. Capacity is defined as 90-100% of rated capacity. If it is impractical to test at capacity, then sources may be tested at less than capacity; in this case subsequent source operation is limited to 110% of the test load until a new test is conducted. Once the unit is so limited, then operation at higher capacities is allowed for no more than fifteen days for purposes of additional compliance testing to regain the rated capacity in the permit, with prior notification to the Department.

[Rules 62-297.310(2) and 62-4.070, F.A.C.; operating permit application received September 14, 2000]

A.7. Compliance Testing. – Annual Visible Emissions tests are required to be conducted between April 1 and May 31 to show compliance with the standards of the Department. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. The visible emissions tests shall be conducted in accordance with DEP Method 9 for 30 minutes while the silo is being loaded at 50 TPH and simultaneously unloaded into at least one tanker truck at 25 tons in approximately 15 minutes (the equivalent of 100 TPH). 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.]

Permit No.: 7775099-003-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.: 7775099-003-AO

Appendix G-1

GENERAL CONDITIONS:

Page 2 of 2

recurrence of the noncompliance. The permittee shall be responsible for any and all damages that 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 Department approves the transfer.

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 that 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.

ATTACHMENT 1

Boral Material Technologies, Inc.
Pensacola, FL

Permit No.: 7775099-003-AO

GENERAL HOUSEKEEPING RULES

Precautions to Prevent Emissions of Unconfined Particulate Matter

In order to reduce fugitive emissions the following steps will be taken:

1. Application of water to unpaved areas when necessary and or removal of particulate matter from roads and other paved areas under control of Boral Material Technologies to help prevent fugitive emissions
2. Curtailing of operations if winds are entraining unconfined particulate matter
3. Posting of vehicle speed limits

Procedures for Startup and Shutdown

During each materials transfer operation:

1. Visual inspection of system during silo loading and/or tanker loading
2. Inspection for visible emissions from baghouse
3. Inspection for visible emissions from pressure release valves and/or hatches
4. Inspection for visible emissions from flexible hoses and/or connectors
5. Immediate action will be taken to stop the release of unconfined particulate matter. If the problem(s) cannot be immediately resolved, operation will cease. Operation will not resume until the problem(s) are resolved.

After each transfer operation:

1. Attend to any spills promptly and effectively
2. Any spilled material will be immediately wetted to a point that is sufficient to prevent entrainment of unconfined particulate matter and then removed to a landfill

Operation and Maintenance Plan

To be done yearly or as needed:

1. Check cleaning cycle and pulse jet mechanism
2. Check all cartridges for signs of wear and replace if necessary
3. Check flexible hoses and connectors for excessive dust build-up
4. Check flexible hoses connector gaskets
5. Check all gaskets for proper seal
6. Check and tighten all flange bolts and seals. Recaulk as needed.