Florida Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590
Phone: 904/807-3300 ♦ Fax: 904/448-4366

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

PERMITTEE:
Specialty Construction Brands, Inc.
1913 NW 60 Lane
Gainesville, Florida 32653

I.D. Number:	0010069
Permit/Cert Number:	0010069-005-AC
Date of Issue:	November 26, 2007
Expiration Date:	November 26, 2008
County:	Alachua
Latitude/Longitude:	29°42′34″ N; 82°20′54″ W
UTM:	E-(17) 369.5; N-3287.1
Project:	Product Receiving Bins Replacement Dust Collector Installation

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-210, 62-212, 62-296, 62-297 and 62-4. 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 department and made a part hereof and specifically described as follows:

PROJECT

For the replacement and relocation of the dust collectors on the (4) existing product receiving bins which presently vent within the building, with (4) CAMCORP Model 7PRT24 Pulse-Jet baghouse dust collectors. The replacement dust collectors will be roof-mounted and vent directly to the atmosphere.

FACILITY DESCRIPTION

This facility is a Mortar and Grout Plant. The silo dust collectors control the emissions produced by the pneumatic loading of raw materials from container trucks into the storage silos.

Pollutants: Particulate Matter, Unconfined Particulate Matter.

REGULATED EMISSION UNITS:

EU No.	Description
001	Mortar and Grout Processing Plant

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Specialty Construction Brands, Inc.
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Point No.	Description	Control Device
01		Process Central Dust Collector No.1 - Torit
02		Process Central Dust Collector No.2 - Tenkay
03	Silo 1 – Type III Cement	Dust Collector
04	Silo 2 – 40/140 Sand	Dust Collector
05	Silo 3 – Calcium Carbonate	Dust Collector
06	Silo 4 – 40/140 Sand	Dust Collector
07	Silo 5 – White Portland Cement	Dust Collector
08	Silo 6 – Grey Portland Cement	Dust Collector
09	Silo 7 – EGS Sand	Dust Collector
10	Product Receiving Bin 1	CAMCORP Model 7PRT24 Pulse-Jet Baghouse
11	Product Receiving Bin 2	CAMCORP Model 7PRT24 Pulse-Jet Baghouse
12	Product Receiving Bin 3	CAMCORP Model 7PRT24 Pulse-Jet Baghouse
13	Product Receiving Bin 4	CAMCORP Model 7PRT24 Pulse-Jet Baghouse

REGULATORY CLASSIFICATION

The facility is regulated under Rule 62-296.320, F.A.C.- General Pollutant Emission Limiting Standards. Rule 62-297.620(4), F.A.C.- Exceptions and Approval of Alternate Procedures and Requirements has been applied to the dust collectors.

The facility is a minor source of air pollution because the potential emissions of regulated air pollutants are less than 100 tons per year, and individual and total hazardous air pollutants are less than 10 and 25 tons per year, respectively in accordance with Chapter 62-210, FAC

OPERATING LOCATION

Located: 1913 NS 60th Lane, Gainesville, Alachua County, Florida.

RELEVANT DOCUMENTS

The documents listed below are the basis of the permit. They are specifically related to this permitting action. These documents are on file with the Department:

Non-Title V Air Operation Permit No. 0010069-004-AO
Application for Air Permit – Non-Title V Source received June 14, 2007
Additional Information Received July 25, 2007
Comments from Applicant received November 5, 2007

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FLOW DIAGRAM INCLUDED FOR INFORMATIONAL PURPOSES ONLY

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GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.161, 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 the 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. Neither 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 is not 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 permitted 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, as 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 and at a reasonable time, access to the premises, where the permitted activity is located or conducted to:

a. Have access to and copy any record that must be kept under the conditions of the permit;

b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and

c. Sample or monitor 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.

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GENERAL CONDITIONS:

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 non-compliance; and

b. the period of non-compliance, including dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

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 prescribed by Sections 403.73 and 403.111, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the 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, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Compliance with New Source Performance Standards (NSPS)
( ) Compliance with National Emission Standards for Hazardous Air Pollutants/ Maximum Available Control Technology (MACT)

GENERAL CONDITIONS:

14. 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 measurements;
- the person responsible for performing the sampling or measurement;
- the dates analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. 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 that 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.

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The following specific conditions apply to the Emissions Units and Emission Points listed below:

Emissions Unit	Brief Description
001	Mortar and Grout Manufacturing Facility

Emission Point	Brief Description
EP 10 EP 11 EP 12 EP 13	Product Receiving Bin No. 1. 12 tons per hour capacity. Product Receiving Bin No. 2. 12 ton per hour capacity. Product Receiving Bin No. 3. 12 ton per hour capacity. Product Receiving Bin No. 4. 12 ton per hour capacity. Each Product Receiving Bin is controlled by a CAMCORP Baghouse Dust Collector, Model 7PRT24: Outlet Gas Flow Rate.....1,100 ACFM Outlet Gas Temperature.....80 °F Cleaning Method…… …….Reverse Pulse-jet No. of Bags…….24 Bag Material……..16 oz. Polyester Singed Fabric Total Area to Filter Media (sq. ft.)…….269 Air to Cloth Ratio…….4.1 Manufacturer's Guarantee Outlet loading (grains/acf)…….0.02

OPERATIONAL PARAMETERS

1. Product Receiving Bins – Permitted Capacity. The nominal loading and unloading rate of each Product Receiving Bin (EP Nos. 10, 11, 12, and 13) is 12.0 tons per hour. At no time shall multiple product receiving bins be operated at this nominal loading rate simultaneously. The maximum process rate at the bagging and packaging area is limited to no more than 12.0 tons per hour.

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

2. Product Receiving Bins -Hours of Operation. The hours of operation for these emission points are not restricted, i.e. 8760 hours per year of operation.

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

3. Product Receiving Bins – Control Equipment. To control particulate matter at each Product Receiving Bin, each of the CAMPCORP dust collectors shall be in operation in order to achieve at least the emissions standards specified in this permit.

[Rule 62-4.070(3), F.A.C.]

EMISSION LIMITS AND STANDARDS

{Permitting Note: Unless otherwise specified, the averaging times for these conditions are based on the specified averaging time of the applicable test method.}

4. Product Receiving Bins -Visible Emissions. Each of the CAMPCORP baghouses at each Product Receiving Bin shall be operated such that Visible emissions from each of these emissions points shall not exceed 5 percent opacity.

   [Rule 62-297.620(4), F.A.C.; Rule 62-4.070(3), F.A.C.]

5. Product Receiving Bins -Particulate Matter. Estimated particulate matter emissions from each Product Receiving Bin, based on the vendor guarantee, is no more than 0.02 gr/acf.

   [Rule 62-4.070(3), F.A.C]

6. General Visible Emissions Standard. Except for emissions unit 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 discharge 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 Ringelmann Chart (20% opacity). Compliance shall be determined by EPA Method 9 upon Department's request, incorporated and adopted by reference in Rule 62-297, F.A.C.

   [Rule 62-296.320(4)(b) 1., F.A.C.]

7. 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.

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

8. Objectionable Odor. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is 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), F.A.C., Objectionable Odor Prohibited; and, Rule 62-210.200(181), F.A.C., Definitions-Objectionable Odor]

TEST METHODS AND PROCEDURES

9. Product Receiving Bins -Visible Emissions. The Visible Emissions test method for each Product Receiving Bin shall be EPA Method 9, incorporated in Chapter 62-297, F.A.C. The test shall be conducted by an observer certified in accordance with the requirements of Rule 62-297.320, F.A.C. – Standards for Persons Engaged in Visible Emissions Observations. The initial compliance tests shall be conducted within 60-days of installation of the dust collectors on each Product Receiving Bin. Subsequent compliance tests shall be conducted at each Product Receiving Bin on an annual basis once each federal fiscal year (October 1 – September 30) thereafter.

   [Rules 62-297.310(7)(a)4.a., F.A.C.]

10. Product Receiving Bins - Particulate Matter**.** Each of the Product Receiving Bins shall be assumed to be in compliance with the Particulate Matter emission estimate stated in Specific Condition No. 5 if each of the emission points comply with the Visible Emissions limitations stated in Specific Condition No. 4. The permittee shall also conduct a compliance test upon Department request in accordance with the requirements of Specific Condition No.12. The test method shall be EPA Method 5, incorporated and adopted by reference in Chapter 62-297, F.A.C.

    [Rule 62-297.310(7)(c),F.A.C.]

11. EPA Method 9- Required Sampling Time. The required minimum period of observation for each compliance test shall be thirty (30) minutes or, if the operation is normally completed in less than 30 minutes and does not recur within that time, the period of observation shall be equal to the duration of the batch cycle or operation completion time. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur.

    [Rules 62-297.310(4)(a)2 and (4)(a)2.a., F.A.C.]

12. 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 shall 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.]

13. Compliance Test Procedures. Compliance test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

    [Rule 62-4.070(3),F.A.C.]

14 Operation During Compliance Test. Unless otherwise stated in the applicable emission limiting standard rule, testing of emissions shall be conducted with the emissions unit operation at permitted capacity (stated in Specific Condition 1.) If it is impracticable to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit.

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

EQUIPMENT REQUIREMENTS

15. Required Equipment. The owner or operator of an emissions unit for which compliance tests are required shall install, operate, and maintain equipment or instruments necessary to determine process variables, such as process weight input or heat input, when such data are needed in conjunction with emissions data to determine the compliance of the emissions unit with applicable emission limiting standards.

[Rule 62-297.310(5)(a), F.A.C.]

16. Accuracy of Equipment. Equipment or instruments used to directly or indirectly determine process variables, including devices such as belt scales, weight hoppers, flow meters, and tank scales, shall be calibrated and adjusted to indicate the true value of the parameter being measured with sufficient accuracy to allow the applicable process variable to be determined within 10% of its true value.

[Rule 62-297.310(5)(b), F.A.C.]

17. Control Equipment. Control equipment shall be provided with a method of access that is safe and readily accessible.

[Rule 62-297.310(6), FAC.]

18. Circumvention of Control Devices. No person shall circumvent any air pollution control device, or allow the emissions of air pollutants without the applicable air pollution control device operating properly.

[Rule 62-210.650, F.A.C.]

19. Control Devices Operation and Maintenance Plan. The dust collectors shall be maintained in accordance with recommendations provided by the vendor. All activities shall be performed as scheduled and recorded. This information shall be retained for at least 3 years from the date of measurement or recording, and be readily assessable for onsite review by the Department.

[Rule 62-4.070(3), F.A.C.; Rule 62-4.160(7), F.A.C., Rule 62-4.160(14)(b), F.A.C.]

EXCESS EMISSIONS

20. Excess Emissions -Allowed. Excess emissions resulting from startup, shutdown, or malfunction of any emissions unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) 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.]

21. Excess Emissions -Prohibited. Excess Emissions which are cause 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.]

NOTIFICATIONS, RECORDKEEPING AND REPORTING REQUIREMENTS

22. Compliance Test Notification. At least 15 days prior the date on which each formal compliance test is due to begin, the permittee shall provide written notification of the test to the Air Compliance Section of this Office. The notification must include the following information: the date, time, and location of each test; the name and telephone number of the facility's contact person who will be responsible for coordinating the test; and the name, company and telephone number of the person conducting the test.

    [Rule 62-297.310(7)(a)9., F.A.C.]

23. Compliance Test Report Submittals. Reports of the required compliance tests shall be filed with the Air Compliance Section of this Office as soon as practical but no later than 45 days after the last test is completed.

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

24. Excess Emissions – Malfunctions. In case of excess emissions resulting from malfunctions, the owner or operator shall notify the Department 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.]

25. Plant Operation – Problems. If the permittee is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the permittee shall immediately notify the Department. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with Department rules.

[Rule 62-4.130, F.A.C.]

ADMINISTRATIVE

26. The ID Number and Project Name for this source shall be used on all correspondences.

27. Definitions. Rules 62-210.200(159), (230) and (245), F.A.C. define the following terms.

a. *Startup* is defined as the commencement of operation of any emissions unit which has shut down or ceased operation for a period of time sufficient to cause temperature, pressure, chemical or pollution control device imbalances, which result in excess emissions.

b. *Shutdown* is the cessation of the operation of an emissions unit for any purpose.

c. *Malfunction* is defined as any unavoidable mechanical and/or electrical failure of air pollution control equipment or process equipment or of a process resulting in operation in an abnormal or unusual manner.

[Rule 62-210.200(159), (230), and (245), FAC.]

28. Applicable Regulations. The facility is subject to the following regulations: Florida Administrative Code Chapters 62-4; 62-103; 62-204; 62-210; 62-212, 62-296, and 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any applicable federal, state, or local permitting requirements or regulations.

[Rule 62-210.300, F.A.C.]

29. General Conditions. The owner and operator is subject to and shall operate under the General Permit Conditions 1 through 15 of this permit. General Permit Conditions are binding and enforceable pursuant to Chapter 403 of the Florida Statutes.

[Rule 62-4.160, F.A.C.]

30. Any revision(s) to a permit (and application) must be submitted to the Department, in writing, and approved by the Department prior to implementation.

31. Construction Permit Required. Unless exempt from permitting pursuant to Rule 62-210.300(3)(a) or (b), F.A.C., or Rule 62-4.040, F.A.C., an air construction permit shall be obtained by the owner or operator of any proposed new, reconstructed, or modified facility or emissions unit, or any new pollution control equipment prior to the beginning of construction, reconstruction pursuant to CFR 60.15 or 63.2, or modification of the facility or emissions unit or addition of the air pollution control equipment; or to establish a PAL; in accordance with all applicable provisions of Chapter 62-210, F.A.C., Chapter 62-212, F.A.C., and Chapter 62-4, F.A.C.

    [Rule 62-210.300(1)(a), F.A.C.]

32. All reports, tests, notifications or other submittals required by this permit shall be submitted to the:

    Department of Environmental Protection
    Northeast District – Air Program
    7825 Baymeadows Way, Suite B200
    Jacksonville, Florida 32256
    Telephone: 904/807-3300
    Fax: 904/448-4366

33. An air construction permit shall be issued for a period of time sufficient to allow construction of the emissions unit and operation while the new emissions unit is conducting tests or otherwise demonstrating initial compliance with the conditions of the construction permit. Subsequent to construction and demonstration of compliance with the conditions of the construction permit, the owner or operator of shall obtain an initial air operation permit in accordance with all applicable provisions of Chapter 62-210 and Chapter 62-4. A completed Application for Air Permit - Non Title V Source (DEP Form No. 62-210.900(3), F.A.C.), shall be submitted to the Department at least 60 days prior to the expiration date of this construction permit. To properly apply for an operation permit, the permittee shall submit the appropriate application form, processing fee, and compliance test reports as required by this permit.

    [Rules 62-4.055, 62-4.220, 62-210.300(1)(a), and 62-210.300(2), F.A.C.]

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

Christopher L. Kirts, P.E.
District Air Program Administrator