Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Ryan E. Matthews
Interim Secretary

PERMITTEE

Argos USA, LLC
4000 Northwest County Road (CR) 235
Newberry, Florida 32669

Responsible Official:
Mr. Chris Horner, Plant Manager

Air Permit No. 0010087-063-AC
Permit Expires: xx/xx/xxxx
Minor Air Construction Permit

Argos Newberry Cement Plant
Modify the existing dust shuttling system

PROJECT

This is the final air construction permit, which authorizes the modification of the existing dust shuttling system authorized under Permit No. 0010087-042-AC to add a single 1,000 short ton (ston) dust bin designated as N-BN01; three new baghouses; and three new small bin vents: 2,500 acfm Emission Point (EPs) filters N-BF01 and N-FN01), 876 acfm (EP 1N-FR01) filter and 876 acfm (EP 2N-FR01) filter. The proposed work will be conducted at the existing Argos Newberry Cement Plant, which is a Portland cement plant (Standard Industrial Classification No. 3241). The existing facility is located in Alachua County at 4000 Northwest CR 235, in Newberry, Florida. The UTM coordinates are Zone 17, 3285.7 km North, 346.4 km East; Latitude 29º41'37" and Longitude 82º35'11".

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

STATEMENT OF BASIS

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 Jacksonville, Florida

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
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Julie R. Hudson
Environmental Manager
Permitting Program

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CERTIFICATE OF SERVICE

The undersigned duly designated deputy clerk hereby certifies that this permit and all copies were sent on the filing date below to the following listed persons:

Chris Horner, Plant Manager, Argos USA, LLC, (CHorner@argos-us.com)
Dr. Maxwell Lee, Ph.D., P.E., Koogler and Associates, Inc., (mlee@kooglerassociates.com)
Henry Gotsch, Environmental Manager, Argos USA, LLC, (OGotsch@argos-us.com)
Ms. Barbara Friday, DEP OPC, Barbara.Friday@dep.state.fl.us
Ms. Lynn Scearce, DEP OPC, Lynn.Scearce@dep.state.fl.us

FILING AND ACKNOWLEDGMENT
FILED, on this date, pursuant to Section 120.52, F. S., with the designated Department Clerk, receipt of which is hereby acknowledged.

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Clerk Stamp Date

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FACILITY DESCRIPTION

Argos Cement, LLC, Argos Newberry Cement Plant, is a Portland cement plant and associated quarry, and raw material and cement handling operations. The plant combines raw materials and utilizes preheater/precalciner kilns with in-line raw mill to produce clinker. The clinker is milled and combined with gypsum to produce Portland cement. The facility consists of the following major activities: raw material handling and storage; raw mill systems; kiln systems clinker handling; finish grinding operations; cement handling, loading, and bagging operations; and coal handling and grinding operations.

Each In-Line Kiln System (emission unit (EU) 003 and EU 010) includes a 157-foot kiln, a 4-stage preheater tower, a multi-stage combustion calciner, a tire feed system, two coal burners; and ancillary equipment. To control emissions of particulate matter (PM), the kiln systems are equipped with an electrostatic precipitator (ESP).

The existing facility consists of the following emissions units.

E.U. ID No.	Brief Description
001	Raw Materials Handling and Storage
002	Raw Mill System Line 1 (EUs 01, 03 and 04)
003	In Line Kiln System/ Raw Mill- Line 1
004	Clinker Handling Line 1
005	Finish Grinding Operations Line 1
006	Cement Handling, Loading, and Bagging Operations
007	Coal Handling and Grinding Operation Line 1
008	Clinker to Railcar/ Truck Conveyor
009	Raw Mill System Line 2 (EUs 01- 10)
010	In Line Kiln/Raw Mill- Line 2
011	Clinker Handling- Line 2
012	Finish Grinding Operation- Line 2
013	Cement Load-Out Silos 6 & 7
014	Coal Handling and Grinding operations
017	Three Emergency Engines
019	Emergency Diesel Fire Pump (83 HP).

PROPOSED PROJECT

The dust shuttling system is for controlling gaseous mercury emissions from the pyroprocessing system and are used only on an as-needed basis. This Air construction permit, authorizes the modification of the existing dust shuttling system authorized under Permit No. 0010087-042-AC and allow the dust to transfer from either kiln system 1 and 2 to either finish mill 1 and 2. The modification will require the bin to vent along with two other transfer vents and thus the system is no longer totally enclosed. The new holding bin provides greater control of the amount and timing to move dust out of the kilns and when to move the dust to either finish mill. With the new holding bin, Argos can transfer more dust to control more mercury and manage the product quality specifications by means of this modification (redesign). This project will add a single 1,000 short ton (ston) dust bin designated as N-BN01; three new baghouses; and three new small bin vents: 2,500 acfm Emission Point (EPs) filters N-BF01 and N-FN01), 876 acfm (EP 1N-FR01) filter and 876 acfm (EP 2N-FR01) filter.

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This project will modify the following emissions units.

Facility ID No. 0010087	
ID No.	**Emission Unit Description**
003	In Line Kiln System/ Raw Mill- Line 1
010	In Line Kiln System/ Raw Mill- Line 2

FACILITY REGULATORY CLASSIFICATION

- The facility **is** 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** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

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1. Permitting Authority: The permitting authority for this project is the Northeast District Office of the Department of Environmental Protection (Department). The Northeast District Office mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office (Compliance and Assurance) at: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256.

3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); Appendix D (Common Testing Requirements); Appendix E (40 CFR 63 Subpart A - General Provisions); Appendix F (40 CFR 63 Subpart LLL).

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, 62-213, 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. Construction and Expiration: The expiration date shown on the first page of this permit provides time to complete the physical construction activities authorized by this permit, complete any necessary compliance testing, and obtain an operation permit. Notwithstanding this expiration date, all specific emissions limitations and operating requirements established by this permit shall remain in effect until the facility or emissions unit is permanently shut down. For good cause, the permittee may request that a permit be extended. Pursuant to Rule 62-4.080(3), F.A.C., such a request shall be submitted to the Permitting Authority in writing before the permit expires. [Rules 62-4.070(3) & (4), 62-4.080 & 62-210.300(1), F.A.C.]

8. Source Obligation:

a. Authorization to construct shall expire if construction is not commenced within 18 months after receipt of the permit, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time. This provision does not apply to the time period between construction of the approved phases of a phased construction project except that each phase must commence construction within 18 months of the commencement date established by the Department in the permit.

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 virtue of a relaxation in any enforceable limitation which was established after August 7, 1980,

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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.

c. 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.]

9. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation to determine compliance with Department rules. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V air operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results, and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority with copies to the Compliance Authority. [Rules 62-4.030, 62-4.050 and Chapter 62-213, F.A.C.]

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This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
003	In Line Kiln System/ Raw Mill- Line 1 *Commence Construction Date: 03/26/1999.* *Initial Startup Date: 12/17/1999.*
010	In Line Kiln/Raw Mill- Line 2 *Commence Construction Date: 07/25/2005.* *Initial Startup Date: 03/10/2010.*

{These EUs are subject to applicable rules of 40 CFR 63, Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry adopted and incorporated by reference in Chapter 62-204; and 40 CFR 63 Subpart A – General Provisions.}

1. **Existing Permits**: This permit supplements all existing valid air permits. Unless otherwise specified, the permittee shall continue to comply with all applicable conditions from valid air construction and operation permits.

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

EQUIPMENT

2. **Dust Bin**: The permittee is authorized to modify (redesign) the existing dust shuttling system by installing:

- A single 1,000 short ton (ston) dust bin designated as N-BN01 with a splitter to allow the dust to transfer from either kiln system 1 and 2 to either finish mill 1 and 2;
- Three new baghouses (EPs 01, 02, and 03);
- Three new small bin vents: 2,500 acfm Emission Point (EPs) filters N-BF01 and N-FN01), 876 acfm (EP 1N-FR01) filter and 876 acfm (EP 2N-FR01) filter.
- Enclosed conveyors.

The construction shall be in accordance with the application and associated documents provided to the Permitting Authority for the issuance of this permit. Any changes to the project that are contrary to these documents and permit shall be reported in writing to the Permitting Authority by the P.E. of Record.

[Application No. 0010087-063-AC]

3. **NESHAP Requirements**: This unit is subject to 40 CFR 63, Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry adopted and incorporated by reference in Chapter 62-204; and 40 CFR 63 Subpart A – General Provisions.

[40 CFR 63, Subpart A General Provisions; 40 CFR 63.1340(a), 40 CFR 63.1340(b)(7)]

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PERFORMANCE RESTRICTIONS

4. **Method of Operation – Minimizing Emissions**: 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); and 4- CFR 63.1348(d)]

5. **Restricted Operation**: The hours of operation are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

6. The Dust Bin (N-BN01), each baghouse and each bin vent filter (N-BF01, N-FN01, 1N-FR01, and 2N-FR01) shall be authorized to only re-direct existing kiln dust from the Kiln Systems baghouses and are not authorized to generate new quantities of kiln dust.

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

7. **Emissions Standards**:

NESHAP VE (Each Emissions Point). Each EP (**01, 02, 03, N-BF01, N-FN0, 1N-FR01 and 2N-FR01**) shall not cause to be discharged any gases which exhibit opacity in excess of 10 percent. Compliance shall be determined in the manner described in 40 CFR 63.1350(f)(1) below:

LLL Periodic Opacity Monitoring Requirements – EPA Method 22. The facility must conduct required opacity monitoring in accordance with the provisions (1)(i) through (vii) of this **Specific Condition.**

(1)(i) The facility must conduct a monthly 10-minute visible emissions test of each affected source in accordance with Method 22 of appendix A-7 to part 60 of this chapter. The performance test must be conducted while the affected source is in operation.

(ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of performance testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, you must resume performance testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iii) If no visible emissions are observed during the semi-annual test for any affected source, you may decrease the frequency of performance testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual performance test, the owner or operator must resume performance testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

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No. 7. Continued:

(iv) If visible emissions are observed during any Method 22 performance test, of appendix A-7 to part 60 of this chapter, the facility must conduct 30 minutes of opacity observations, recorded at 15-second intervals, in accordance with Method 9 of appendix A-4 to part 60 of this chapter. The Method 9 performance test, of appendix A-4 to part 60 of this chapter, must begin within 1 hour of any observation of visible emissions.

(v) Any totally enclosed conveying system transfer point, regardless of the location of the transfer point is not required to conduct Method 22 visible emissions monitoring under this **Specific Condition**. The enclosures for these transfer points must be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.

(vi) If any partially enclosed or unenclosed conveying system transfer point is located in a building, you must conduct a Method 22 performance test, of appendix A-7 to part 60 of this chapter, according to the requirements of (1)(i) through (iv) of this **Specific Condition** for each such conveying system transfer point located within the building, or for the building itself, according to (1)(vii) of this **Specific Condition**.

(vii) If visible emissions from a building are monitored, the requirements of (1)(i) through (1)(iv) of this **Specific Condition** apply to the monitoring of the building, and you must also test visible emissions from each side, roof, and vent of the building for at least 10 minutes.

(2) *Corrective actions.* If visible emissions are observed during any Method 22 visible emissions test conducted under (1) of this **Specific Condition**, you must initiate, within one-hour, the corrective actions specified in your operation and maintenance plan as required in 40 CFR 63.1347 **Specific Condition No. 10**.

[40 CFR 63.1350(f)(1)(i) – (vii), (f)(3); and 40 CFR 63.1348(b)(1)(i)]

TESTING AND FREQUENCY REQUIREMENTS

8. <u>Method 9 Compliance Tests (Each EP 01, 02, 03, N-BF01, N-FN0, 1N-FR01 and 2N-FR01))</u>:

a. <u>Initial NESHAP Compliance Tests</u>. The facility must demonstrate compliance with the opacity emissions standards by using the performance test methods and procedures in 40 CFR 63.1349(b)(2) (**b. of this Specific Condition)**. Use the maximum 6-minute average opacity exhibited during the performance test period to determine whether the affected source is in compliance with the standard.

b. The facility shall be tested to demonstrate initial compliance with the emissions standards for VE in accordance with EPA Method 9 (as described in 40 CFR 60, Appendix A-4 and are adopted by reference in Rule 62-204.800, F.A.C.) for the visual determination of opacity.

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Condition No. 8 Continued:

Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C. The duration of the Method 9 performance test must be 3 hours (30 6-minute averages), except that the duration of the Method 9 performance test may be reduced to 1 hour if the conditions of (i) and (ii) of this **Specific Condition** apply. For batch processes that are not run for 3-hour periods or longer, compile observations totaling 3 hours when the unit is operating.

(i) There are no individual readings greater than 10 percent opacity;
(ii) There are no more than three readings of 10 percent for the first 1-hour period.

[40 CFR 63.1349(b)(2); 40 CFR 63.1348(a)(2); and 40 CFR 63.6(h)(5)(ii)]

9. 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) F.A.C.]

OPERATION AND MAINTENANCE PLAN REQUIREMENTS

10. <u>O & M Plan</u>:

(a) The facility must prepare, for each affected source subject to the provisions of this subpart, a written operations and maintenance plan. The plan must be submitted to the Administrator for review and approval as part of the application for a part 70 (Title V Permit) and must include the following information:

(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emissions limits and operating limits. The facility operations and maintenance plan must address periods of startup and shutdown.
(2) Corrective actions to be taken when required by paragraph 40 CFR 63.1350(f)(3) **Specific Condition No. 7**.(2).

(b) Failure to comply with any provision of the operations and maintenance plan developed in accordance with this **Specific Condition** is a violation of the standard.

[40 CFR 63.1347(a) and (b)]

RECORDS AND REPORTS

11. <u>Test Reports</u>: 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. For each test run, the report shall also indicate the maximum throughput rate.

[Rule 62-297.310(10), F.A.C.]

12. <u>NESHAP Recordkeeping and Reporting</u>. The owner or operator of an affected source required to conduct opacity or visible emission observations by a relevant standard shall report the opacity or visible emission results (produced using Test Method 9 or Test Method 22, or an alternative to these test methods) along with the results of the performance test required under 40 CFR 63.7.

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Condition No. 12. Continued:

If no performance test is required, or if visibility or other conditions prevent the opacity or visible emission observations from being conducted concurrently with the performance test required under 40 CFR 63.7, the owner or operator shall report the opacity or visible emission results before the close of business on the 30th day following the completion of the opacity or visible emission observations.

[40 CFR 63.10(d)(3); and 40 CFR 63.1354(b)(2)]

13. <u>NESHAP Recordkeeping</u>.

a. The owner or operator shall maintain files of all information (including all reports and notifications) required by this section recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.

[40 CFR 63.1355(a)]

b. The owner or operator shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (b)(3) of this part; and

(1) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9;

(2) All records of applicability determination, including supporting analyses; and

(3) If the owner or operator has been granted a waiver under 40 CFR 63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements.

[40 CFR 63.1355(b)]

14. The facility must keep records of the date, time and duration of each malfunction that causes an affected source to fail to meet an applicable standard; if there was also a monitoring malfunction, the date, time and duration of the monitoring malfunction; the record must list the affected source or equipment, an estimate of the volume of each regulated pollutant emitted over the standard for which the source failed to meet a standard, and a description of the method used to estimate the emissions.

[40 CFR 63.1355 (g)(1)]

15. The facility must keep records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.1348(d) **Specific Condition No. 4.,** including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.1355 (g)(2)]

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16. For each exceedance from an emissions standard or established operating parameter limit, you must keep records of the date, duration and description of each exceedance and the specific actions taken for each exceedance including inspections, corrective actions and repeat performance tests and the results of those actions.

[40 CFR 63.1355(h)]

NOTIFICATIONS

17. **40 CFR 63 Notification of Opacity and Visible Emission Observations.** The owner or operator of an affected source shall notify the Administrator in writing of the anticipated date for conducting the opacity or visible emission observations specified in 40 CFR 63.6(h)(5) **Specific Condition No. 8**, if such observations are required for the source by a relevant standard. The notification shall be submitted with the notification of the performance test date, as specified in 40 CFR 63.9(e), or if no performance test is required or visibility or other conditions prevent the opacity or visible emission observations from being conducted concurrently with the initial performance test required under 40 CFR 63.7, the owner or operator shall deliver or postmark the notification not less than 30 days before the opacity or visible emission observations are scheduled to take place.

[Rule 62-4.070(3), F.A.C.; 40 CFR 63.1349; and 40 CFR 63.9 (f)]

Submit all the above and below notifications to Christopher Kirts at Christopher.Kirts@dep.state.fl.us.

18. **Notification of Construction and Startup:**

a. **40 CFR 63 Notification of Construction.** A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected facility is commenced postmarked no later than 30 days after such date.

[Rule 62-4.070(3), F.A.C.; and 40 CFR 60.7 (a)(1)]

b. **40 CFR 63 Notification of Startup.** A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

[Rule 62-4.070(3), F.A.C.; 40 CFR 60.7 (a)(3); and 40 CFR 63.9 (b)(4)(v)]

19. This Facility is subject to SECTION 2. Administrative Requirements of this permit and, the attached Combined Appendices.

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