Florida Department of Environmental Protection

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Tallahassee, Florida 32399-2400

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Secretary

PERMITTEE

Titan Florida, LLC
11000 Northwest 121st Way
Medley, Florida 33178

Authorized Representative:
Mr. Konstantinos Nikolaou, Plant Manager

Air Permit No. 0250020-050-AC
Permit Expires: 03/31/2021
Minor Air Construction Permit
Pennsuco Complex
New Truck Loadout

PROJECT

This is the final air construction permit, which authorizes the installation of a new Truck Loadout Unit 4 with a new dust collector and spout, adjacent to the existing Truck Loadout Unit 3. The proposed work will be conducted at the existing Pennsuco Complex, which is categorized under Standard Industrial Classification No. 3241. The facility is in Miami-Dade County at 11000 NW 121st Way, in Medley, Florida. The UTM coordinates are Zone 17,562.27kilometers (km) East and 2861.7 km North.

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 Tallahassee, Florida

David Lyle Read, P.E.
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For:
Syed Arif, P.E., Program Administrator
Office of Permitting and Compliance
Division of Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Construction Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Mr. Konstantinos Nikolaou, Titan Florida, LLC: knikolaou@titanamerica.com
Mr. William Kissel, Titan Florida, LLC: wkissel@titanamerica.com
Mr. Max Lee, Ph.D., P.E., Koogler and Associates, Inc.: mlee@kooglerassociates.com
Mr. Vincent Warger, Koogler and Associates, Inc.: vwarger@kooglerassociates.com
Mr. Bernardo Beiler, P.E., Miami-Dade RER: bernardo.beiler@miamidade.gov
Ms. Lynn Scearce, DEP OPC: lynn.scearce@dep.state.fl.us

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Lynn Scearce

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FACILITY DESCRIPTION

Titan Florida, LLC (Titan) operates the Pennsuco Facility in Medley, Miami-Dade County, Florida. The facility consists of a dry process Portland cement plant, an aggregate plant, two batch "ready-mix" concrete plants, and a cement block plant. The Portland cement plant has an allowable production rate of 2,190,000 tons/year of clinker and 2,400,000 tons/year of cement. It includes fuel and raw material storage, feed bins, a coal mill, a dry process pyroprocessing line, transfer equipment, finish mills, clinker and cement silos, and product packaging and load out facilities.

The facility consists of the following emissions units (EU):

EU No.	Emission Unit Description
010	Finish Mill System: Finish Mill No. 1
011	Finish Mill System: Finish Mill No. 2
012	Finish Mill System: Finish Mill No. 3
013	Finish Mill System: Finish Mill No. 4
030	Finish Mill System: Finish Mill No. 6
014	Cement Handling System: Cement Storage Silos. 1 through 12
015	Cement Handling System: Cement Distribution, Rail and Truck Loadout/Mobile Cementitious Material Sack Loadout System
016	Cement Handling System: Cement Packhouse
022	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant Subject to 40 CFR 60, Subpart OOO
023	Nonmetallic Mineral Processing Plant Equipment and Operations at Aggregate Plant NOT Subject to 40 CFR 60, Subpart OOO
024	Concrete Block Plant
025	Two Concrete Batch Ready Mix Plants
026	Coal and Petcoke Handling System
027	Clinker Handling and Storage System
028	Pyroprocessing/Raw Mill System
029	Raw Material Handling System
031	Unregulated Emissions Units and/or Activities: Fugitive Emissions
032	Cementitious Sack Loadout System
034	Transloading of Cementitious Material
036	Emergency Diesel Fuel Fired Air Compressor
038	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 63, Subpart ZZZZ
039	Emergency Diesel Fuel Fired Generators Subject to 40 CFR 60, Subpart IIII

PROPOSED PROJECT

The applicant submitted an application to the Department on December 18, 2017, (Link to application, click "Public Oculus Login" button) requesting authorization to install and operate a new Truck Loadout Unit 4 with a new dust collector and spout, adjacent to the existing Truck Loadout Unit 3. In addition, the applicant requests that the Baghouse "Model No. DC-Incorporated 720 Model No. VML 140 Dust Collector" which controls emissions from the Mobile Cementitious Material Sack Loadout System, be corrected to Baghouse "Model No. DC 1400".

The following existing emissions units (EU) will be affected by this project.

EU No.	Description
015	Cement Handling System: Cement Distribution, Rail and Truck Loadout Mobile Cementitious Material Sack Loadout System.

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility does not operate units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- The facility operates units subject to the New Source Performance Standards (NSPS) of Title 40 Part 60 of the Code of Federal Regulations (CFR).
- The facility operates units subject to the National Emissions Standards of Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Office of Permitting and Compliance in the Division of Air Resource Management of the Department of Environmental Protection (Department). The Office of Permitting and Compliance mailing address is 2600 Blair Stone Road (MS #5505), Tallahassee, Florida 32399-2400.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Miami-Dade County, Department of Regulatory and Economic Resources at 701 Northwest 1st Court, Suite 400, Miami, Florida 33136.

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 (NSPS Subpart A); Appendix F (NSPS Subpart F); Appendix G (NESHAP Subpart LLL); and Appendix H (NESHAP Subpart A).

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. 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.]

A. EU 015, Cement Handling System

This section of the permit addresses the following emissions unit.

EU No.	Description
015	Cement Handling System: Cement Distribution, Rail and Truck Loadout Mobile Cementitious Material Sack Loadout System.

The following baghouses control particulate matter (PM) emissions from the Cement Handling System - Cement Distribution, Rail and Truck Loadout Mobile Cementitious Material Sack Loadout System:

Emissions Point No.	Description of Emissions Points
Baghouse I.D. B-110	Dust collector - Bulk Loadout Unit 1 (Rail/Truck).
Baghouse I.D. B-210	Dust collector - Bulk Loadout Unit 2 (Truck).
Baghouse I.D. B-323	Dust collector - Loadout.
Baghouse I.D. VL002	Dust collector - Bulk Loadout Unit 2 - Line 2 (Truck Loadout Operation)
Baghouse I.D. B-372	Dust collector - Bulk Loadout Unit 3 - Line 1
Baghouse I.D. B-382	Dust collector - Bulk Loadout Unit 3 - Line 3
Baghouse I.D. VL003	Dust collector - Bulk Loadout Unit 3 - Line 3 (Truck Loadout Operation)
Baghouse I.D. B-120	Dust collector - Packhouse
Baghouse Model No. DC-~~Incorporated 720 Model No. VML 140 Dust Collector~~ 1400	Dust collector – Mobile Cementitious Material Sack Loadout System
Baghouse I.D. VL004	Dust Collector – Bulk Loadout Unit 4 – Line 4 (Truck Loadout Operation)

{Permitting Note: This EU is regulated under 40 CFR 60, Subpart A – General Provisions; Subpart F - Standards of Performance for Portland Cement Plants; 40 CFR 63, Subpart A – General Provisions; and Subpart LLL - NESHAP from the Portland Cement Manufacturing Industry.}

PREVIOUS APPLICABLE REQUIREMENTS

1. Other Permits: The conditions of this permit supplement all previously issued air construction and operation permits for this emission unit. Unless otherwise specified, these conditions are in addition to all other applicable permit conditions and regulations. [Rule 62-4.070, F.A.C.]

EQUIPMENT

2. Truck Loadout Unit 4: The permittee is authorized to install a new Truck Loadout Unit with a spout having a nominal flow rate of 190 tons per hour (TPH). [Application No. 0250020-050-AC]

PERFORMANCE RESTRICTIONS

3. Hours of Operation/Restricted Operation: The hours of operation are not limited (8,760 hours/year). [Rule 62-210.200(PTE), F.A.C.]

CONTROL EQUIPMENT

4. Dust Collector: Emissions of PM from the new truck loadout unit 4 shall be controlled with a dust collector. The dust collector, manufactured by Dust Control and Loading Systems, Inc (or equivalent), shall have a design flow rate of 1,600 cubic feet per minute (CFM). [Rule 62-210.200(PTE), F.A.C. and Application No. 0250020-050-AC]

EMISSIONS STANDARDS

5. Visible Emissions (VE): VE from the dust collector (VL004) shall not exceed 10%. [40 CFR 60.62 and 63.1345]

TESTING REQUIREMENTS

6. Initial Compliance Tests: The emissions unit shall be tested to demonstrate initial compliance with the emissions standards for VE. 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. Initial compliance with the 10% opacity limit shall be demonstrated in accordance with Method 9 of Appendix A-4. The permittee shall 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. For batch processes that are not run for 3-hour periods or longer, compile observations totaling 3 hours when the unit is operating. The duration of the Method 9 test shall 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 following conditions apply:

   a. There are no individual readings greater than 10% opacity;

   b. There are no more than three readings of 10% for the first 1-hour period.

   [Rule 62-297.310(8)(b)1, F.A.C.; and 40 CFR 63.1349(b)(2) and 63.1351(d)]

7. Test Requirements: The permittee shall notify the Compliance Authority in writing at least 15 days prior to any required tests. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(9), F.A.C.]

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

Method	Description of Method and Comments
9	Visual Determination of the Opacity of Emissions from Stationary Sources
22	Visual Determination of Fugitive Emissions from Material Sources

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

MONITORING REQUIREMENTS

9. Periodic Opacity Monitoring:

   a. *Opacity Monitoring*. If you are subject to a limitation on opacity under 40 CFR 63.1345, you must conduct required opacity monitoring in accordance with the provisions of paragraphs (1) through (7) of this condition ((40 CFR 63.1350(f)(1)(i) (vii)) and in accordance with the monitoring plan developed under 40 CFR 63.1350(p). You must also develop an opacity emissions monitoring plan (40 CFR 63.1350(p)(1) - (4)) and approved alternate monitoring requirements (40 CFR 63.1350(o)(5)), if applicable.

      (1) You must conduct a monthly 10-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A–7. The performance test must be conducted while the affected source is in operation.

      (2) 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.

(3) 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.

(4) If visible emissions are observed during any Method 22 performance test, of appendix A–7, you must conduct 30 minutes of opacity observations, recorded at 15-second intervals, in accordance with Method 9 of appendix A–4. The Method 9 performance test, of Appendix A–4, must begin within 1 hour of any observation of visible emissions.

(5) The requirement to conduct Method 22 visible emissions monitoring does not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" must mean a conveying system transfer point that is enclosed on all sides, top, and bottom. 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.

(6) 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, according to the requirements of paragraphs (1) through (4) for each such conveying system transfer point located within the building, or for the building itself, according to paragraph (7).

(7) If visible emissions from a building are monitored, the requirements of paragraphs (1) through (4) 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.

b. *Corrective actions.* If visible emissions are observed during any Method 22 visible emissions test conducted under **Specific Condition 9 a**, you shall initiate, within one-hour, the corrective actions specified in the site-specific operating and maintenance plan provisions in 40 CFR 63.1347.

[40 CFR 63.1350(f)]

10. Operation and Maintenance (O&M) Plan: The permittee shall prepare an O&M Plan in accordance with 40 CFR 63.1347. The O&M plan shall address the schedule for inspection of the unit and require preventive maintenance and shall require records of the condition of the equipment upon each inspection and any maintenance activities performed. The O&M plan shall be submitted to the Department as part of the Title V permit revision application for review. [40 CFR 63.1347]