

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

I. GENERAL INFORMATION

A. APPLICANT

United States Gypsum Company
6825 Evergreen Ave.
Jacksonville, Fl. 32208-4996

Permit No: 0310072-013-AC
County: Duval

B. PROJECT

On April 19, 2006, the United States Gypsum Company submitted an application for a construction permit to construct a new joint treatment production line at the Gypsum Wallboard Manufacturing Plant in Jacksonville. Various emission units associated with the existing joint treatment production line will be shut down and removed from service.

II. RULE APPLICABILITY

The facility is located in an area unclassifiable for the air pollutant particulate matter (PM) less than or equal to ten (10) micrometers, in the area of influence of an air quality maintenance area for PM, and in an air quality maintenance area for ozone pursuant to Chapter 62-204, Florida Administrative Code (FAC), and Jacksonville Environmental Protection Board (JEPB), Rule 2.201.

The facility is a major source of air pollution because the potential emissions of regulated air pollutants are greater than 100 tons per year pursuant to Chapter 62-210, FAC, and JEPB Rule 2.301.

The project is subject to the provisions of New Source Performance Standards (NSPS), 40 CFR 60, Subpart OOO, Standards of Performance for Non-Metallic Mineral Processing Plants, 40 CFR 60, Subpart A, General Conditions, and Particulate Matter (PM) Reasonably Available Control Technology (RACT) requirements. EU nos. 101 through 105 are subject to the NSPS and are **exempt** from RACT requirements. The RACT exemption is based upon allowable PM emissions that are calculated at less than one (1) ton per year for each EU. EU nos. 106 through 107 are subject to NSPS **and** PM RACT requirements. The facility is currently minor for purposes of Prevention of Significant Deterioration (PSD) [i.e., potential to emit is below 250 tons per year]. After the modification the facility potential to emit (post modification) will still be below 250 tons per year, which will maintain the classification of the facility as minor for PSD purposes.

III. TECHNICAL EVALUATION

EU nos. 101 through 105 are each material storage silos controlled with an individual baghouse (bin vent filter) for each silo with an estimated 800 dry standard cubic feet per minute (dscfm) air flow rate. Visible emissions shall be limited to seven (7) per cent (%) opacity for each silo in accordance with NSPS. EU no. 106 consists of four (4) premixers for mixing ingredients for the manufacture of joint treatment compound. EU no. 106 is controlled by four (4) baghouses (one on each premixer) with an estimated 500 dscfm air flow rate each. The baghouses discharge to the atmosphere through a single, common stack. This EU is subject to the NSPS PM limit of 0.022 gr/dscf and to the RACT VE limit of 5 % opacity (which is more stringent than the NSPS limit of 7% opacity). EU no. 107 is the joint treatment compound bagging operation. EU no. 107 is controlled by a baghouse with an estimated 1200 dscfm air flow rate. This EU is subject to the NSPS PM limit of 0.022 gr/dscf and to the RACT VE limit of 5 % opacity (which is more stringent than the NSPS limit of 7% opacity).

Testing Requirements

Initial VE and PM testing shall be required on EU nos. 106 and 107. Initial VE testing only shall be required on EU nos. 101 through 105. VE testing shall be conducted using Environmental Protection Agency (EPA) Reference Method (RM) 9. PM testing shall be conducted using EPA RM 5 or 17. Specific testing procedures are delineated in the rule and the permit.

Record-Keeping and Reporting Requirements

Notification requirements for actual start-up dates and commencement of construction dates are specified in the permit. Records shall be recorded and maintained in accordance with the Operation and Maintenance Plan (O&M) for EU nos. 106 and 107. Records shall be provided upon request of the Department.

IV. CONCLUSION

Based upon information provided by the United States Gypsum Company the Department has reasonable assurance that the proposed modification of the United States Gypsum Company, Gypsum Wallboard Manufacturing Plant, as described in this evaluation and subject to the conditions proposed herein, will not cause, or contribute to a violation of any ambient air quality standard or other technical provision of Chapters 62-296 and 62-297, FAC, JEPB Rules 2.1001 and 2.1101.