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Specialty Minerals, Inc.
Pensacola PCC Plant, Precipitated Calcium Carbonate Facility
Facility ID No.: 0330248
Escambia County

Air Operation Permit
Permit No.: 0330248-003-AO

Permitting Authority
Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, FL 32501-5794
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[electronic file name:0330248o.doc]

Air Operation Permit
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Department of Environmental Protection

Lawton Chiles
Governor

Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

Virginia B. Wetherell
Secretary

Permittee:
Specialty Minerals, Inc.

Permit No.: 0330248-003-AO
Facility ID No.: 0330248
SIC Nos.: 28, 2819
Project: Air Operation Permit

This permit is for the operation of the Pensacola Precipitated Calcium Carbonate Plant located at 375 Muscogee Road in Cantonment on a leased site within Champion Paper property, Escambia County; UTM Coordinates: Zone 16, 469.57 km East and 3374.64 km North; Latitude: 30° 30' 19" North and Longitude: 87° 19' 13" West.

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, and 62-296. 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

Effective Date: August 17, 1998
Renewal Application Due Date: June 18, 2003
Expiration Date: August 17, 2003

**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

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

EKM/as

Section I. Facility Information.

Subsection A. Facility Description.

This facility consists of lime receiving transfer and storage equipment and carbonation reactors. Dry lime is combined with water and carbon dioxide to produce precipitated calcium carbonate which is used as filler material in paper manufacturing.

Dry lime is received by rail car or tanker truck and transferred to storage silos. Particulate emissions from lime receiving, the lime surge bin and the storage silos are controlled by fabric filters. Process lime is conveyed by screw conveyor to the lime slaker to be mixed with water. The slaked lime slurry is pumped to the carbonators. A portion of the stack gas from the Champion lime kiln is routed to PCC process gas scrubbers for cleaning and the cleaned stack gas, high in carbon dioxide, is routed to the carbonators for reaction with the slaked lime to produce precipitated calcium carbonate. Carbonator exhaust stacks are equipped with mist eliminators to control liquid particulate emissions.

Potential particulate emissions from the lime handling system are calculated to be 6.4 T/yr. Potential particulate emissions from the carbonator stacks are calculated to be 8.57 T/yr. As this facility utilizes a portion of the stack gas from the Champion lime kiln, it is not the intent of this permit to penalize this facility or Champion for emissions which would normally be expected to originate from the lime kiln stack by double-accounting of the emissions.

Also included in this permit are miscellaneous unregulated/insignificant emissions units and/or activities.

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

The Construction of the Precipitated Calcium Carbonate Facility is being conducted in two phases. Two carbonators have been built initially with a third to be added when economically feasible. The construction permit allows for possible near-future construction changes for emission unit 001, Lime Handling System, to allow extra operational flexibility to the facility and ensure the source meets Ambient Air Quality Standards. The permittee may decide to install a taller stack for vacuum blower #1 and have round-the-clock operation. The operational flexibility given by the Alternate Operating Scenario is requested by permittee if it is found that lime cannot be delivered reliably between the hours of 6:00am and 8:00pm due to paper mill rail yard traffic conflicts. These changes are covered by 0330248-002-AC and may be rolled over into this operating permit upon successful compliance testing.

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

E.U.

<u>ID No.</u>	<u>Brief Description</u>
001	Lime Handling System Fabric Filters: Vacuum Blowers: VB1, VB2, VB3 (in-line dust filters) Surge Bin Dust Collector: SB Lime Silo 1: LS1, Lime Silo 2: LS2
002	Carbonator Exhausts: Carbonator 1, Carbonator 2, Carbonator 3 (future)
003	Facility Fugitive Emissions

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:

Permit Application for 0330248-001-AC, received April 11, 1997

Additional information request dated April 21, 1997

Revised permit application for 0330248-001-AC, received April 21, 1997

Additional information received May 30, 1997

Permit Application for minor modification to 0330248-001-AC, received March 23, 1998

Additional information received May 6, 1998

Permit Application for 0330248-003-AO, received July 20, 1998

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 which 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. Prevention of Accidental Releases (Section 112(r) of CAA). If required by 40 CFR 68, the permittee shall submit to the implementing agency:
 - a. a risk management plan (RMP) when, and if, such requirement becomes applicable; and
 - b. certification forms and/or RMPs according to the promulgated rule schedule.[Rule 62-204.800(12), F.A.C., and 40 CFR 68]
5. General Pollutant Emission Limiting Standards. Unconfined Emissions of Particulate Matter. Reasonable precautions to prevent emissions of unconfined particulate matter at this facility include: good housekeeping practices such as periodic sweeping and/or vacuuming of work areas, application of dust suppressing substances, and protecting dust transfer points and containers from wind
[Rule 62-296.320(4)(c)2., F.A.C.]
6. When appropriate, any recording, monitoring, or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
[Rule 62-213.440, F.A.C.]
7. 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.]

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8. The permittee shall submit all compliance related notifications and reports required of this permit to the Department's Northwest District office:

Department of Environmental Protection
Northwest District Office
160 Governmental Center
Pensacola, Florida 32501-5794
Telephone: 850/595-8364
Fax: 850/595-8597

9. The Department telephone number for reporting problems, malfunctions or exceedances under this permit is (850) 595-8364, 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 during normal working hours.
[Rules 62-210.700 and 62-4.130, F.A.C.]

Section III. Emissions Unit(s) and Conditions.

E.U.

ID No. Brief Description

001 Lime Handling System Fabric Filters:
 Vacuum Blowers: VB1, VB2, VB3 (in-line dust filters)
 Surge Bin Dust Collector: SB
 Lime Silo 1: LS1, Lime Silo 2: LS2

Dry lime is received by rail car or tanker truck and transferred to storage silos by vacuum blowers via a surge bin. Particulate emissions from lime receiving and the storage silos are controlled by fabric filters with 99.9% collection efficiency. Process lime is conveyed by screw conveyor to the lime slaker to be mixed with water.

This permit follows 0330248-002-AC, which allows for possible near-future construction changes for emission unit 001, Lime Handling System, to allow extra operational flexibility to the facility. Permittee may decide to install a taller stack for vacuum blower #1 and have round-the-clock operation. The operational flexibility given by the Alternate Operating Scenario is requested by permittee if it is found that lime cannot be delivered reliably between the hours of 6:00 AM and 8:00 PM due to paper mill rail yard traffic conflicts.

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

Essential Potential to Emit (PTE) Parameters

A.1. Capacity. The rated capacity for testing purposes of each of the vacuum blowers is 13.3 T/hr of lime transferred. The rated capacity for testing purposes of the lime surge bin is 40 T/hr of lime transferred. The rated capacity for testing purposes of each of the lime silos is 40 T/hr of lime transferred. These are not limits and are only intended to be used for compliance testing when needed.

[Rules 62-4.070, 62-4.160(2) and 62-210.200(PTE), F.A.C.]

A.2. Methods of Operation

a. Under normal operation, Lime Handling System Vacuum Blowers VB1, VB2, and VB3 shall have their hours of operation limited to the hours from 6:00 AM to 8:00 PM.

b. If permittee finds the need to operate the Lime Handling System at other times to accommodate lime deliveries, the Alternative Operating Scenario shall be allowed: Permittee shall notify the Department by letter when the change is decided to be implemented. VB1 stack shall be raised to a minimum of 75 feet. VB1 shall be allowed to operate 24 hours/day. VB2, and VB3 shall have their hours of operation still limited to the hours from 6:00 AM to 8:00 PM.

c. Permittee shall keep record of hours of operation for the Lime Handling System Vacuum Blowers and make records available for Department inspection.

d. The Surge Bin and Lime Silos shall not have hours restrictions.

[Rules 62-4.160(2) and 62-213.440(1), F.A.C.; Permittee request; permit application for 0330248-002-AC]

Reasonable Assurances

A.3. Permittee commits to operating under the Malfunction Prevention and Abatement Plan of Attachment V to the permit application. Daily visual inspections and routine inspections shall be undertaken to ensure the dust filters are operating properly. Delivery operations shall be discontinued if fabric filters are not operating properly and shall not resume until the fabric filters are repaired and operating properly.

[Rules 62-4.070(3), 62-4.160(2) and 62-213.440(1), F.A.C.; Permittee request; permit application for 0330248-002-AC]

NOTE: This emissions unit is also subject to applicable conditions contained in **Subsection D. Common Conditions.**

Subsection B. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
002	Carbonator Exhausts: Carbonator 1, Carbonator 2, Carbonator 3 (future)

Process lime is conveyed by screw conveyor to the lime slaker to be mixed with water. The slaked lime slurry is pumped to the carbonators. A portion of the stack gas from the Champion lime kiln is routed to PCC process gas scrubbers for cleaning and the cleaned stack gas, high in carbon dioxide, is routed to the carbonators for reaction with the slaked lime to produce precipitated calcium carbonate. Carbonator exhaust stacks are equipped with mist eliminators to control liquid particulate emissions.

Potential particulate emissions from the carbonator stacks are calculated to be 8.57 T/yr. As this facility utilizes a portion of the stack gas from the Champion lime kiln, it is not the intent of this permit to penalize this facility or Champion for emissions which would normally be expected to originate from the lime kiln stack by double-accounting the emissions.

The Construction of the Precipitated Calcium Carbonate Facility is being conducted in two phases. Two carbonators have been built initially with a third to be added when economically feasible. The third carbonator shall be included in this permit upon completion of construction and successful compliance testing.

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

Essential Potential to Emit (PTE) Parameters

B.1. Capacity. The maximum allowable operating rate for each of the carbonators is given in the Confidential Attachment to the permit.

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

B.2. Hours of Operation. The first two carbonators, may operate continuously, i.e., 8760 hrs/yr, based on 24 hours/day, 7 days/week and 52 weeks per year, while only two carbonators are installed. To avoid triggering the 100 T/yr major source threshold for NOx emissions, upon installation of the third carbonator, the cumulative hours of stack gas injection for all three carbonators shall not exceed 25,200 hours per year. This is assured by proprietary process description in confidential file. Permittee shall keep logs of stack gas injection times for each carbonator and make them available for Department inspection for a period of five years.

[Rules 62-4.070, 62-4.160(2) and 62-210.200(PTE), F.A.C.; permittee request; revised construction permit application received May 27, 1997; 0330248-001-AC; application for 0330248-002-AC]

Emission Limitations and Standards

B.3. Maximum allowable particulate emissions from each Carbonator Stack is given in the Confidential Attachment to the permit.
[Rule 62-296.320(4)(a)2., F.A.C.]

B.4. Visible emissions from the Carbonator stacks shall not be greater than 5% opacity. This self-imposed limit is in exchange of waiver of particulate testing.
[Permittee request; construction permit application; Rule 62-297.310(7)(c), F.A.C.]

Test Methods and Procedures

B.5. Visible Emissions tests are required to show compliance with the standards of the Department. Visible emissions tests shall be conducted using EPA Method 9 for 30 minutes. Particulate emissions testing is waived if compliance with the Visible Emissions limit is met. If compliance with the Visible Emissions limit is not met, Particulate Emissions tests shall be conducted using EPA Method 5. The test results must provide reasonable assurance that the source is capable of compliance at the permitted maximum operating rate. Such tests shall be scheduled annually to be conducted by March 1 of each year for the two existing carbonators. In addition, such tests shall be scheduled within 30 days after initial operation of the third carbonator when it is constructed, and annually thereafter with the other two carbonators. 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, 296.320(4)(a)3., 62-297.310(7), and 62-297.401(9), F.A.C.]

B.6. The test reports shall comply with applicable portions of Rule 62-297.310, F.A.C., Test Reports. The Department can require special compliance tests in accordance with Rule 62-297.310(7) F.A.C. 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.]

B.7. Testing of emissions shall be conducted with the source operating at capacity. 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.]

Reasonable Assurances

B.8. Permittee commits to operating under the Malfunction Prevention and Abatement Plan of Attachment V to the permit application. Daily visual inspections and routine inspections shall be undertaken to ensure the demisters are operating properly. Carbonator operations shall be discontinued if demisters are not operating properly and shall not resume until the demisters are repaired and operating properly.

[Rules 62-4.070(3), 62-4.160(2) and 62-213.440(1), F.A.C.; Permittee request; permit application for 0330248-002-AC]

B.9. Operation of Carbonator 3 (future) may be allowed under this permit only after the Department has received and verified a properly signed and sealed certification from the permittee's Professional Engineer stating that 1) the construction of the third carbonator was completed in accordance with permit number 0330248-002-AC, and, 2) that the unit has properly demonstrated compliance with the terms and conditions contained therein.

[Rules 62-4.030, 62-4.050, and 62-4.070, F.A.C.]

NOTE: This emissions unit is also subject to applicable conditions contained in **Subsection D. Common Conditions.**

Subsection C. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
003	Facility Fugitive Emissions

Subsection D. Common Conditions.

E.U.

<u>ID No.</u>	<u>Brief Description</u>
001	Lime Handling System Fabric Filters: Vacuum Blowers: VB1, VB2, VB3 (in-line dust filters) Surge Bin Dust Collector: SB Lime Silo 1: LS1, Lime Silo 2: LS2
002	Carbonator Exhausts: Carbonator 1, Carbonator 2, Carbonator 3 (future)

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

Recordkeeping and Reporting Requirements

D.1. Frequency of Compliance Tests. The following provisions apply only to those emissions units that are subject to an emissions limiting standard for which compliance testing is required.

(a) General Compliance Testing.

1. The owner or operator of an emissions unit that is subject to any emission limiting standard shall conduct a compliance test that demonstrates compliance with the applicable emission limiting standard prior to obtaining a renewed operation permit. Emissions units that are required to conduct an annual compliance test may submit the most recent annual compliance test to satisfy the requirements of this provision. In renewing an air operation permit pursuant to Rule 62-210.300(2)(a)3.b., c., or d., F.A.C., the Department shall not require submission of emission compliance test results for any emissions unit that, during the year prior to renewal:
 - a. Did not operate; or
 - b. In the case of a fuel burning emissions unit, burned liquid fuel for a total of no more than 400 hours.
2. During each federal fiscal year (October 1 - September 30), unless otherwise specified by rule, order, or permit, the owner or operator of each emissions unit shall have a formal compliance test conducted for:
 - a. Visible emissions, if there is an applicable standard;
 - b. Each of the following pollutants, if there is an applicable standard, and if the emissions unit emits or has the potential to emit: 5 tons per year or more of lead or lead compounds measured as elemental lead; 30 tons per year or more of acrylonitrile; or 100 tons per year or more of any other regulated air pollutant; and,
 - c. Each NESHAP pollutant, if there is an applicable emission standard.

3. The owner or operator shall notify the Department, at least 15 days prior to the date on which each formal compliance test is to begin, of the date, time, and place of each such test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator.

(b) 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.

(c) Waiver of Compliance Test Requirements. If the owner or operator of an emissions unit that is subject to a compliance test requirement demonstrates to the Department, pursuant to the procedure established in Rule 62-297.620, F.A.C., that the compliance of the emissions unit with an applicable weight emission limiting standard can be adequately determined by means other than the designated test procedure, such as specifying a surrogate standard of no visible emissions for particulate matter sources equipped with a bag house or specifying a fuel analysis for sulfur dioxide emissions, the Department shall waive the compliance test requirements for such emissions units and order that the alternate means of determining compliance be used, provided, however, the provisions of Rule 62-297.310(7)(b), F.A.C., shall apply.
[Rule 62-297.310(7), F.A.C.; and, SIP approved]

D.2. An annual operating report for air pollutant emitting facility, DEP Form 62-210.990(5), shall be submitted by March 1 of each year. A copy of the form and instructions may be obtained from the Department's Northwest District office.
[Rule 62-210.370, F.A.C.]

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 recurrence of the noncompliance. 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 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 transfer is approved by the Department.

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 which 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.