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Sent by Electronic mail – Received Receipt Requested

Humberto H. Garza
Vice President Logistics
Cemex Cement of Louisiana, Inc.
1501 Belvedere Road
West Palm Beach, FL 33406

Re: Project No. 0570031-021-AC
Cemex Cement of Louisiana, Inc.
Ship Unloading and Truck Loading Equipment

Dear Mr. Garza:

On October 22, 2018, you submitted an application to install a portable ship unloading system; to authorize the loading of cement materials into trucks from Silo No. 10; and to refurbish two of the existing baghouses at the facility. The existing facility is located in Hillsborough County at 3417 Port Sutton Road, Tampa, FL 33619.

Enclosed are the following documents: the Written Notice of Intent to Issue Air Permit; the Public Notice of Intent to Issue Air Permit; the Technical Evaluation and Preliminary Determination; and the Draft Permit with Appendices. The Public Notice of Intent to Issue Air Permit is the actual notice that you must have published in the legal advertisement section of a newspaper of general circulation in the area affected by this project.

If you have any questions, please contact Lora Webb or Diana M. Lee, P.E., Chief, Air Permitting, at (813) 627-2600 or by email at webbl@epchc.org or lee@epchc.org.

Executed in Tampa, Florida.

Sincerely,

Janet L. Dougherty
Executive Director

Enclosures

JLD/LAW/law

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:

Cemex Cement of Louisiana, Inc.
1501 Belvedere Road
West Palm Beach, FL 33406

Authorized Representative:
Humberto H. Garza, Vice President Logistics

Project No. 0570031-021-AC
Minor Air Construction Permit

Ship Unloading and Truck Loading Equipment
Hillsborough County, Florida

Facility Location: Cemex Cement of Louisiana, Inc. operates the existing facility, which is located in Hillsborough County at 3417 Port Sutton Road, Tampa, FL 33619.

Project: This project authorizes the installation of a portable ship unloading system, which will be used to unload cement materials from ships that do not have self-unloading capabilities. Also, this permit authorizes the loading of cement materials into trucks from Silo No. 10. In addition, this permit authorizes the refurbishment of two existing baghouses. Details of the project are provided in the application and the enclosed Technical Evaluation and Preliminary Determination.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Environmental Protection Commission of Hillsborough County is the Permitting Authority responsible for making a permit determination for this project. The Permitting Authority's physical/mailing address is: 3629 Queen Palm Dr., Tampa, Florida 33619. The Permitting Authority's telephone number is (813) 627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at address indicated above for the Permitting Authority. The complete project file includes the draft permit, the Technical Evaluation and Preliminary Determination, the application, and the information submitted by the applicant, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Permitting Authority's project review engineer for additional information at the address or phone number listed above.

Notice of Intent to Issue Permit: The Permitting Authority gives notice of its intent to issue an air permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of the proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a final permit in accordance with the conditions of the draft permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Public Notice: Pursuant to Section 403.815, F.S. and Rules 62-110.106 and 62-210.350, F.A.C., you (the applicant) are required to publish at your own expense the enclosed Public Notice of Intent to Issue Air Permit (Public Notice). The Public Notice shall be published one time only as soon as possible in the legal advertisement section of a newspaper of general circulation in the area affected by this project. The newspaper used must meet the requirements of Sections 50.011 and 50.031, F.S. in the county where the activity is to take place. If you are uncertain that a newspaper meets these requirements, please contact the Permitting Authority at above address or phone number. Pursuant to Rule 62-110.106(5) and (9), F.A.C., the applicant shall provide proof of publication to the Permitting Authority at the above address within 7 days of publication. Failure to publish the notice and provide proof of publication may result in the denial of the permit pursuant to Rule 62-110.106(11), F.A.C.

Comments: The Permitting Authority will accept written comments concerning the draft permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting

Authority by close of business (5:00 p.m.) on or before the end of the 14-day period. If written comments received result in a significant change to the draft permit, the Permitting Authority shall revise the draft permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this written notice of Intent to Issue Air Permit. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the attached Public Notice or within 14 days of receipt of this written notice of Intent to Issue Air Permit, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602 before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

Executed in Tampa, Florida.

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

for,

Janet L. Dougherty
Executive Director

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this written notice of Intent to Issue Air Permit package (including the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the draft permit with Appendices) 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.

Humberto H. Garza - Cemex Cement of Louisiana, Inc. humbertohernan.garza@cemex.com
Dr. Maxwell Lee, P.E. – Koogler and Associates mlee@kooglerassociates.com
Tammy Garcia - Koogler and Associates tgarcia@kooglerassociates.com

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.

Sahand Nasseri 11/20/18
Clerk Date

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Draft Air Permit No. 0570031-021-AC
Cemex Cement of Louisiana, Inc.
Hillsborough County, FL

Applicant: The applicant for this project is Cemex Cement of Louisiana, Inc. The applicant's authorized representative and mailing address is: Humberto H. Garza, Vice President Logistics, 1501 Belvedere Rd., West Palm Beach, FL 33406.

Facility Location: The facility operates the existing cement material handling facility, which is located in Hillsborough County at 3417 Port Sutton Road, Tampa, FL 33619.

Project: This project authorizes: 1) the installation of a portable ship unloading system; 2) the installation of equipment that will allow the loading of cement materials into trucks from Silo No. 10; and 3) the refurbishment of two baghouses that control emissions from the ship and railcar unloading operations. The facility remains a Synthetic Minor source of emissions.

Permitting Authority: Applications for air construction permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4, 62-210 and 62-212 of the Florida Administrative Code (F.A.C.). The proposed project is not exempt from air permitting requirements and an air permit is required to perform the proposed work. The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County. The Permitting Authority's physical/mailing address is: 3629 Queen Palm Dr., Tampa, FL 33619. The Permitting Authority's phone number is (813) 627-2600.

Project File: A complete project file is available for public inspection during the normal business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday (except legal holidays), at the physical address indicated above for the Permitting Authority. The complete project file includes the Draft Permit, the Technical Evaluation and Preliminary Determination, the application and information submitted by the applicant (exclusive of confidential records under Section 403.111, F.S.). Interested persons may contact the Permitting Authority's project engineer for additional information at the address and phone number listed above. In addition, electronic copies of these documents are available on the following web site: https://fldep.dep.state.fl.us/air/emission/apds/default.asp.

Notice of Intent to Issue Air Permit: The Permitting Authority gives notice of its intent to issue an air construction permit to the applicant for the project described above. The applicant has provided reasonable assurance that operation of proposed equipment will not adversely impact air quality and that the project will comply with all appropriate provisions of Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. The Permitting Authority will issue a Final Permit in accordance with the conditions of the proposed Draft Permit unless a timely petition for an administrative hearing is filed under Sections 120.569 and 120.57, F.S. or unless public comment received in accordance with this notice results in a different decision or a significant change of terms or conditions.

Comments: The Permitting Authority will accept written comments concerning the proposed Draft Permit for a period of 14 days from the date of publication of the Public Notice. Written comments must be received by the Permitting Authority by close of business (5:00 p.m.) on or before the end of this 14-day period. If written comments received result in a significant change to the Draft Permit, the Permitting Authority shall revise the Draft Permit and require, if applicable, another Public Notice. All comments filed will be made available for public inspection.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of

publication of the Public Notice or receipt of a written notice, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Permitting Authority for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. A petition for administrative hearing must contain the information set forth below and must be filed (received) with the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602 before the deadline. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, any email address, telephone number and any facsimile number of the petitioner; the name, address any email address, telephone number, and any facsimile number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact. If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this Public Notice of Intent to Issue Air Permit. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation: Mediation is not available in this proceeding.

TECHNICAL EVALUATION

&

PRELIMINARY DETERMINATION

APPLICANT
Cemex Cement of Louisiana, Inc.
1501 Belvedere Road
West Palm Beach, FL 33406
Facility ID No. 0570031

PROJECT
Project No. 0570031-021-AC
Application for Minor Source Air Construction Permit
Ship Unloading and Truck Loading Equipment

COUNTY
Hillsborough County, Florida

PERMITTING AUTHORITY
Environmental Protection Commission of Hillsborough County
3629 Queen Palm Dr.
Tampa, FL 33619

November 20, 2018

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

Facility Description and Location

Cemex Cement of Louisiana, Inc. is an existing a cement material handling facility, which is categorized under Standard Industrial Classification Code No. 5032 - Brick, Stone & Related Construction Materials. The existing facility is located in Hillsborough County at 3417 Port Sutton Road, Tampa, FL 33619. The UTM coordinates are Zone 17, 359.5 km East, and 3087.3 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS), except for ozone. Hillsborough County is designated as an air quality maintenance area for ozone.

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

This project authorizes the installation of portable Siwertell ship unloader, or equivalent, which will be used to unload cement materials from ships that do not have self-unloading capabilities. Also, this permit authorizes the loading of cement materials into trucks from Silo No. 10. In addition, this permit authorizes the refurbishment of the 13,000 DSCFM Mikro Pulsaire, Model 168S-10-TR, and the 12,500 DSCFM Mikro Pulsaire, Model 168S-10-TR baghouses.

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

EU No.	Emission Unit Description
010	Cement Packing Station and Truck Loading from Silo No. 10 (7,400 Mikro-Pulsaire BH)
019	Railcar Unloading (7,400 Mikro-Pulsaire BH)
024	Cement Unloading Into Silo Nos. 1 – 11 (13,000 Mikro Pulsaire BH and the 12,500 DSCFM Mikro Pulsaire BH)
025	Portable Ship Unloader (3,500 ACFM BH)

Processing Schedule

October 22, 2018	Received the application for a minor source air pollution construction permit.
Not Applicable	Requested additional information.
October 22, 2018	Application complete.

2. DEPARTMENT REVIEW

Cemex Cement of Louisiana, Inc. is a cement material handling facility, which receives cement materials by ship, railcar, and truck. The materials are stored in eleven storage silos and pneumatically loaded out into bags or trucks.

This project authorizes the installation of portable Siwertell ship unloader (EU No. 025), or equivalent, which will be used to unload cement materials from ships that do not have self-unloading capabilities. The offloading process will begin by inserting the ship unloader's extendable auger into the ship hold. A screw conveyor will convey the material from the ship hold to two pressure pots, which will discharge the material to a portable hose. The hose will transfer the material to one of four, existing, cement silo pneumatic transport lines, which will then pneumatically transfer the material into one of eleven storage silos.

The ship unloader equipment will be powered by electricity provided by TECO. However, the ship unloader will have a 64 kW, diesel fuel fired, Perkins 1104C-44, or equivalent, engine that will be used to move the portable ship unloader into position and around the facility as needed. The engine is expected to operate for a maximum of 500 hours per twelve consecutive month period. Based on this, the engine is exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C. - *Generic Emissions Unit or Activity Exemption* because the potential emissions are less than 5.0 tons per year of any regulated air pollutant.

The potential emissions from the portable ship unloader will be controlled by a 3,500 ACFM baghouse located on the ship unloader. In addition, the ship unloader will be controlled by the existing 13,000 DSCFM Mikro Pulsaire, Model 168S-10-TR, and the 12,500 DSCFM Mikro Pulsaire, Model 168S-10-TR baghouses that currently control emissions from the self-unloading ship operation. As part of this project, Cemex will refurbish the 13,000 DSCFM and 12,500 DSCFM baghouses. This permit does not authorize an increase in the airflow rates or in the number of bags in the baghouse.

Based on information provided by Koogler and Associates, Inc., the 3,500 ACFM baghouse has a guaranteed grain loading standard of 10 mg/dscf, which equates to 0.15 gr/dscf. In order to ensure that the baghouse is capable of meeting the emission limiting standard of 0.03 gr/dscf specified in Rule 62-296.711(2)(b), F.A.C. and Ch. 1-3.51, Rules of the EPCHC, this permit includes a requirement to perform a particulate matter compliance stack test on the baghouse the first time the baghouse is used.

In addition, this permit authorizes the loading of cement materials into trucks from Silo No. 10. A new airslide will be constructed to direct material from Silo No. 10 to the truck loadout spout under Silo No. 2. The 7,400 DSCFM Mikro-Pulsaire, Model 1-F-1, baghouse, which controls emissions from the bagging station and from the railcar unloading operation, will also control emissions from the transfer of material from Silo No. 10 to the truck loadout spout under Silo No. 2.

The above changes will result in an increase in the facility-wide potential particulate matter emissions from 65.2 tons/year to 69.2 tons/year. The potential PM emissions from the ship unloading operation (EU Nos. 024 and 025) increase to 32.7 tons/year based on the 3,500 acfm, 12,500 dscfm, and 13,000 dscfm airflow rates of the baghouses, 8,760 hours of operation for each baghouse, and a grain loading standard of 0.03 gr/dscf. The potential PM emissions from Silo No. 10 (EU No. 010) are calculated to be 8.9 tons/year based on the 7,400 dscfm airflow rate of the baghouse, 8,760 hours of operation, and a grain loading standard of 0.03 gr/dscf.

The facility is subject to Rule 62-296.711, F.A.C. (Materials Handling, Sizing, Screening, Crushing and Grinding Operations) and to Ch. 1-3.52, Rules of the EPCHC, which limit visible emissions to 5% opacity.

Summary of Emissions

Particulate Matter (PM) Emissions

EU No.	Description	Potential Emissions (TPY)	Actual Emissions (TPY)	Increase in Emissions (TPY)	Allowable Emissions
010	Cement Packing Station and Truck Loading from Silo No. 10 (7,400 Mikro-Pulsaire BH)	8.3	0	8.3	0.03 gr/dscf and 5% opacity
019	Railcar Unloading (7,400 Mikro-Pulsaire BH)	Included with EU 010	0.3	Included with EU 010	0.03 gr/dscf and 5% opacity
024	Cement Unloading Into Silo Nos. 1 – 11 (13,000 Mikro Pulsaire BH and the 12,500 DSCFM Mikro Pulsaire BH)	28.7	0.8	27.9	0.03 gr/dscf and 5% opacity
025	Portable Ship Unloader	3.9	0	3.9	0.03 gr/dscf and 5% opacity

- The actual emissions for EU Nos. 010, 019, and 024 are based on the average of 2016 and 2017 AOR data.
- The actual emissions for EU No. 025 are based zero because the emission unit has not been constructed.
- The combined potential PM emissions from EU Nos. 010 and 019 are based on the baghouse airflow rate of 7,400 dscfm, 8,760 hours of operation, and a grain loading standard of 0.03 gr/dscf.
- The potential PM emissions from EU No. 024 are based on the baghouse airflow rates of 12,500 dscfm and 13,000 dscfm, 8,760 hours of operation for each baghouse, and a grain loading standard of 0.03 gr/dscf.
- The potential PM emissions from EU No. 025 are based on the baghouse airflow rates of 3,500 dscfm, 8,760 hours of operation for the baghouse, and a grain loading standard of 0.03 gr/dscf.
- The facility-wide PM emissions, including the ship loading operation authorized in Permit No. 0570031-017-AC, are calculated to be 69.2 tons/year.

Local Requirements
Rules of the EPCHC, Chapter 1-3 - Stationary Air Pollution and Ambient Air Quality Standards

State Requirements
Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (RACT) Particulate Matter
Rule 62-296.711, F.A.C. - Materials Handling, Sizing, Screening, Crushing and Grinding Operations

Federal NSPS Provisions
NA

Other Draft Permit Requirements
NA

3. PRELIMINARY DETERMINATION

The EPCHC makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Lora Webb is the project engineer responsible for reviewing the application and drafting

the permit. Additional details of this analysis may be obtained by contacting Lora Webb or Diana M. Lee, P.E. Chief, Air Permitting, at 3629 Queen Palm Dr., Tampa, FL 33619, phone (813) 627-2600, or by email at webbl@epchc.org or lee@epchc.org.

COMMISSION
Lesley "Les" Miller, Jr., Chair
Victor D. Crist, Vice-Chair

Ken Hagan
Al Higginbotham
Pat Kemp
Sandra L. Murman
Stacy White

EXECUTIVE DIRECTOR
Janet L. Dougherty

DIVISION DIRECTORS
Hooshang Boostani, P.E.
Sam Elrabi, P.E.
Andy Schipfer, P.E.
Richard Tschantz, Esq.
Sterlin Woodard, P.E.

PERMITTEE

Cemex Cement of Louisiana, Inc.
1501 Belvedere Road
West Palm Beach, FL 33406

Authorized Representative:
Humberto H. Garza, Vice President Logistics

Project No. 0570031-021-AC
Permit Expires: December 15, 2022
Minor Air Construction Permit

Ship Unloading and Truck Loading Equipment
Hillsborough County, Florida

PROJECT

This is the draft air construction permit, which authorizes 1) the installation of a portable ship unloading system; 2) the loading of cement materials into trucks from Silo No. 10; and 3) the refurbishment of the 13,000 DSCFM Mikro Pulsaire, Model 168S-10-TR, and the 12,500 DSCFM Mikro Pulsaire, Model 168S-10-TR baghouses.

The proposed work will be conducted at the existing facility, which is a cement material handling facility categorized under Standard Industrial Classification Code No. 5032 - Brick, Stone & Related Construction Materials. The existing facility is located in Hillsborough County at 3417 Port Sutton Road, Tampa, FL 33619. The UTM coordinates are Zone 17, 359.5 km East, and 3087.3 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 Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602 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 Tampa, Florida

(DRAFT)

_____
Janet L. Dougherty
Executive Director

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Air 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.

Humberto H. Garza - Cemex Cement of Louisiana, Inc. humbertohernan.garza@cemex.com
Dr. Maxwell Lee, P.E. – Koogler and Associates mlee@kooglerassociates.com
Tammy Garcia - Koogler and Associates tgarcia@kooglerassociates.com

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.

_____ _____

Clerk Date

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FACILITY DESCRIPTION

Cemex Cement of Louisiana, Inc. is a cement material handling facility, which receives cement materials by ship, railcar, and truck. The materials are stored in eleven storage silos and pneumatically loaded out into bags or trucks.

Currently, when the material is received by ship, the materials are pneumatically unloaded from self-unloading ships into the eleven (11) storage silos (8 main silos and 3 interstitial silos), using up to four pneumatic transfer lines. The material is pumped to the silos using the ships' onboard pneumatic pumps.

When material is received by railcar, the material is gravity unloaded into an underground receiving hopper. A Martin Bootlift System, which consists of a foam gasket that contacts the bottom of the railcar as it extends upward, is used to minimize particulate matter emissions from the railcar and hopper during unloading. The unloading operation is assisted by a portable railcar shaker that vibrates the railcar to ensure all of the material is discharged to the receiving hopper. From the receiving hopper, the cement is screw conveyed to a blower located inside the building, which pneumatically transfers the cement to the storage silos.

When material is received by truck, material is pneumatically unloaded into Silo Nos. 6 and 8 using a fill pipe. The material is pumped to the silos using the trucks' onboard pneumatic pumps. Once in the silos, the facility does not have the capability of transferring the material from silo to silo.

The particulate matter emissions from the ship, railcar, and truck unloading operations are controlled by a 13,000 DSCFM Mikro Pulsaire, Model 168S-10-TR, baghouse, located on top of Silo No. 8. The ship unloading operation can also be controlled by a 12,500 DSCFM Mikro Pulsaire, Model 168S-10-TR, baghouse, located on top of Silo No. 1. This baghouse operates only during ship unloading operations. The railcar unloading operation can also be controlled by a 7,400 DSCFM Mikro-Pulsaire, Model 1-F-1, baghouse, which also controls emissions from the cement packing station.

When cement is ready to be loaded into trucks, the trucks are loaded directly from the storage silos using two truck loading bays located within a partially enclosed area. The north loading bay has two loading spouts, one each under Silo Nos. 2 and 3; and the south loading bay has two loading spouts, one each under Silo Nos. 6 and 7. Only one loading spout per truck loading bay can be used at one time. Each truck loading spout has an identical DCL, Model CFM330-114/EF1500, Series UN800, 1,500 DSCFM pulse jet dust collector to control particulate matter emissions from the truck loading operations.

The existing facility consists of the following emissions units (EU).

EU No.	Emission Unit Description
006	North Truck Loading Bay (Two DCL 1500 BHs)
007	South Truck Loading Bay (Two DCL 1500 BHs)
010	Cement Packing Station and Truck Loading from Silo No. 10 (7,400 Mikro-Pulsaire BH)
019	Railcar Unloading (7,400 Mikro-Pulsaire BH)
024	Cement Unloading Into Silo Nos. 1 – 11 (13,000 Mikro Pulsaire BH and the 12,500 DSCFM Mikro Pulsaire BH)

PROPOSED PROJECT

This project authorizes the installation of portable Siwertell ship unloader, or equivalent, which will be used to unload cement materials from ships that do not have self-unloading capabilities. The offloading process will begin by inserting the ship unloader's extendable auger into the ship hold. A screw conveyor will convey the material from the ship hold to two pressure pots, which will discharge the material to a portable hose. The hose will

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transfer the material to one of four, existing, cement silo pneumatic transport lines, which will then transfer the material into the eleven storage silos.

The ship unloader equipment will be powered by electricity provided by TECO. However, the ship unloader will have a 64 kW, diesel fuel fired, Perkins 1104C-44, or equivalent, engine that will be used to move the portable ship unloader into position and around the facility as needed. The engine is expected to operate for a maximum of 500 hours per twelve consecutive month period. Based on this, the engine is exempt from permitting pursuant to Rule 62-210.300(3)(b)1., F.A.C. - *Generic Emissions Unit or Activity Exemption* because the potential emissions are less than 5.0 tons per year of any regulated air pollutant.

The potential emissions from the portable ship unloader will be controlled by a 3,500 ACFM baghouse located on the ship unloader. In addition, the ship unloader will be controlled by the existing 13,000 DSCFM Mikro Pulsaire, Model 168S-10-TR, and the 12,500 DSCFM Mikro Pulsaire, Model 168S-10-TR baghouses that currently control emissions from the self-unloading ship operation. As part of this project, Cemex will refurbish the 13,000 DSCFM and the 12,500 DSCFM baghouses. This permit does not authorize an increase in the airflow rates or in the number of bags in each baghouse.

In addition, this permit authorizes the loading of cement materials into trucks from Silo No. 10. A new airslide will be constructed to direct material from Silo No. 10 to the truck loadout spout under Silo No. 2. The 7,400 DSCFM Mikro-Pulsaire, Model 1-F-1, baghouse, which controls emissions from the bagging station and from the railcar unloading operation, will also control emissions from the transfer of material from Silo No. 10 to the truck loadout spout under Silo No. 2.

This project will add or modify the following emissions units.

EU No.	Emission Unit Description
010	Cement Packing Station and Truck Loading from Silo No. 10 (7,400 Mikro-Pulsaire BH)
019	Railcar Unloading (7,400 Mikro-Pulsaire BH)
024	Cement Unloading Into Silo Nos. 1 – 11 (13,000 Mikro Pulsaire BH and the 12,500 DSCFM Mikro Pulsaire BH)
025	Portable Ship Unloader (3,500 ACFM BH)

FACILITY REGULATORY CLASSIFICATION

- The facility is not 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 (CAA).
- The facility is not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.

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1. Permitting Authority: The permitting authority for this project is the Environmental Protection Commission of Hillsborough County. The mailing address is 3629 Queen Palm Dr., Tampa, Florida 33619.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Environmental Protection Commission of Hillsborough County at: 3629 Queen Palm Dr., Tampa, Florida 33619.

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); and Appendix D (Common Testing Requirements).

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 EPCHC may require the permittee to conform to new or additional conditions. The EPCHC shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the EPCHC 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. Permitted Materials: For the purpose of this permit, cement materials shall be defined as Type I cement, Type II cement, and blended cement products that consist of a combination of one or more of the following: ground granulated blast furnace slag, flyash, silica, calcined clay, other pozzolans, and hydrated lime. [Rule 62-4.070(3), F.A.C. and Permit No. 0570031-013-AC]

8. Objectionable Odor: 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.]

9. Baghouse Pressure Drop Monitoring: Each baghouse shall have a device installed capable of monitoring the pressure drop in inches of water across the control device. These devices shall be maintained in working order and in good repair. [Rule 62-4.070(3) and Permit No. 0570031-011-AC]

10. Circumvention: The permittee shall not allow any person to circumvent any pollution control device nor allow the emissions of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C. and Permit No. 0570031-011-AC]

11. Reasonable Precautions: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not be limited to, the following: [Rule 62-296.320(4)(c), F.A.C.]

    A) Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.

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B) Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from buildings or work areas to prevent particulate from becoming airborne.
C) Use of hoods, fans, filters, and similar equipment to contain, capture and/or vent particulate matter.
D) Enclosure or covering of conveyor systems.

12. Compliance Testing: When the Environmental Protection Commission of Hillsborough County (EPC) 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 Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., 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, unless the EPCHC obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the EPC in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rule 62-297.310(8)(c), F.A.C]

13. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Environmental Protection Commission of Hillsborough County. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]

    {Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: http://www.dep.state.fl.us/air/emission/eaor. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the FDEP by phone at (850) 717-9000 or email at eaor@dep.state.fl.us}.

14. Transfer of Permit: If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

15. 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.]

16. Application for Air Operating Permit: Subsequent to any construction, reconstruction or modification of a facility or emissions unit authorized by an air construction permit, and demonstration of compliance with the conditions of such air construction permit, the owner or operator of such facility or emissions unit shall obtain an initial air operation permit or revision of an existing air operation permit, whichever is appropriate, in accordance with all applicable provisions of this chapter and Chapter 62-4, F.A.C. **The operating permit application shall be submitted within 180 days of the completion of testing of; a) the portable ship unloader and b) the loading of material into trucks from Silo No. 10, or at least 90 days prior to the expiration date of this permit, whichever occurs first**. [Rules 62-4.070(3) and 62-210.300(2), F.A.C.]

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A. EU No. 010 –Cement Packing Station and Truck Loading from Silo No. 10

This section of the permit addresses the following emissions units.

010	Cement Packing Station and Truck Loading from Silo No. 10 (7,400 Mikro-Pulsaire BH)

PERFORMANCE RESTRICTIONS

A.1. Permitted Capacity: The following restrictions and limitations shall apply per twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit No. 0570031-013-AC]

A) No more than 600,000 tons of cement materials shall be received at the facility.
B) The maximum loading rate of each truck loading spout shall not exceed 300 tons per hour.
C) The maximum packing rate of the cement packer shall not exceed 65 tons per hour.
D) Only totally enclosed trucks shall be used to receive bulk delivery. There shall be no open transfer points and/or open bed trucks.

A.2. Restricted Operation: In order to ensure compliance with Specific Condition No. A.3., the following restrictions shall apply per twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit No. 0570031-013-AC]

A) Particulate matter emissions shall be vented to the baghouse as designated in Specific Condition No. A.3. The baghouse shall be operating while the corresponding operation is occurring.
B) Only one loading spout per truck loading bay shall be in operation at one time.
C) The emission unit is authorized to operate 8,760 hours.

EMISSIONS STANDARDS

A.3. Emissions Standards: The maximum allowable and potential emissions for each emission unit shall not exceed the following: [Rule 62-296.711(2), F.A.C., Chapter 1-3.52, Rules of the EPC, and Application No. 0570031-021-AC]

EU No.	Description	DSCFM	Pollutant	Potential Emissions (tons/yr)	Allowable Emission Limitation
010	Mikro-Pulsaire, Model 1-F-1[1]	7,400	PM	8.3	0.03 grains/dscf

[1]This baghouse also controls emissions from EU 019.

A.4. Visible Emissions: The permittee shall not cause, permit, or allow any visible emissions (five percent opacity) from any emission unit, transfer point, or activity associated with the cement materials handling operation. [Rule 62-296.711(2)(a), F.A.C. and Chapter 1-3.52, Rules of the EPC]

TESTING REQUIREMENTS

A.5. Initial Compliance Test: Test the emission unit for visible emissions the first time cement materials are loaded into a truck from Silo No. 10 and annually thereafter, to demonstrate compliance with the opacity standard. Each VE test shall be a minimum of 30 minutes in duration. The opacity test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Submit the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-297.310(5)(b) and (8)(a)3. and 62-4.070(3), F.A.C. and Ch. 1-3.52(3), Rules of the EPCHC]

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A.6. Testing Capacity: Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the throughput rates listed in Specific Condition No. A.1. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. [Rules 62-4.070(3) and 62-297.310(3), F.A.C.]

A.7. 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

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 EPCHC. [Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

A.8. Visible Emission Testing: The maximum allowable emission rate for particulate matter for the emission units is set by Specific Condition No. A.3. Because of the expense and complexity of conducting a stack test on minor sources of particulate matter, the Environmental Protection Commission of Hillsborough County pursuant to the authority granted under Rule 62-297.620(4), F.A.C. hereby allows the particulate testing to be waived in lieu of a visible emissions test not to exceed 5% opacity. [Rule 62-297.620(4), F.A.C.]

A.9. Test Requirements: At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the air compliance program identified by permit, unless shorter notice is agreed to by the appropriate air compliance program. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. 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.]

RECORDS AND REPORTS

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

A) The emission unit number
B) The throughput rate of the emission unit during the test
C) The silo number and loading spout in use during the test

A.11. Operational Data: The permittee shall maintain records in order to ensure compliance with Specific Condition No. A.1. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

A) Day, Month
B) Amount of cement loaded into trucks (tons)
C) Hours of operation for the truck loading operation
D) Rolling twelve month total of B) and C) above (tons)

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B. EU Nos. 019, 024, 025 – Railcar Unloading, Cement Unloading Into Silo Nos. 1 – 11, and Portable Ship Unloader

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
019	Railcar Unloading (7,400 Mikro-Pulsaire BH)
024	Cement Unloading Into Silo Nos. 1 – 11 (13,000 Mikro Pulsaire BH and the 12,500 DSCFM Mikro Pulsaire BH)
025	Portable Ship Unloader (3,500 ACFM BH)

EQUIPMENT

B.1. Equipment Name: The permittee is authorized to install a Siwertell ship unloader, or equivalent, equipped with a 3,500 acfm baghouse. [Rule 62-4.070(3), F.A.C., and Application No. 0570031-021-AC]

PERFORMANCE RESTRICTIONS

B.2. Permitted Capacity: In order to ensure compliance with Specific Condition No. B.4., the following restrictions and limitations shall apply per twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit Nos. 0570031-001-AC, 0570031-011-AC, and 0570031-013-AC]

A) No more than 600,000 tons of cement materials shall be received at the facility.
B) The maximum railcar unloading rate shall not exceed 125 tons per hour
C) The maximum ship unloading rate for self unloading ships shall not exceed 600 tons per hour.
D) The maximum ship unloading rate when using the Siwertell ship unloader, or equivalent, shall not exceed 330 tons (300 metric tons) per hour.
E) The permittee shall avoid pneumatic line pressures that may cause baghouse failure during the ship, truck, and railcar unloading operations.

B.3. Restricted Operation: In order to ensure compliance with Specific Condition No. B.4., the following restrictions and limitations shall apply: [Rule 62-4.070(3), F.A.C. and Permit Nos. 0570031-001-AC, 0570031-011-AC, and 0570031-013-AC]

A) Particulate matter emissions from each operation shall be vented to the corresponding baghouse as designated in Specific Condition No. B.4. The baghouse shall be operating while each corresponding operation is occurring.
B) When unloading railcars, the Martin bootlift shall be in place and shall form a tight seal to prevent fugitive emissions.
C) Check the Martin bootlift for damage and proper operation prior to each use.
D) All silo loading activities shall be accomplished using the pneumatic transfer systems.

EMISSIONS STANDARDS

B.4. Emissions Standards: The maximum allowable and potential emissions for each emission unit shall not exceed the following: [Rule 62-296.711(2), F.A.C., Chapter 1-3.52, Rules of the EPC, and Permit Nos. 0570031-011-AC and 0570031-013-AC]:

EU No.	Description	DSCFM	Pollutant	Potential Emissions (tons/yr)	Allowable Emission Limitation
019 – Railcar Unloading	Mikro-Pulsaire, Model 1-F-1[1]	7,400	PM	Included under EU No. 010	0.03 grains/dscf

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B. EU Nos. 019, 024, 025 – Railcar Unloading, Cement Unloading Into Silo Nos. 1 – 11, and Portable Ship Unloader

EU No.	Description	DSCFM	Pollutant	Potential Emissions (tons/yr)	Allowable Emission Limitation
024 – Ship Unloading	Mikro-Pulsaire, Model 168S-10-TR, on top of Silo No. 1	12,500	PM	14.1	0.03 grains/dscf
024 - Ship, Railcar, and Truck Unloading	Mikro-Pulsaire, Model 168S-10-TR, on top of Silo No. 8	13,000	PM	14.6	0.03 grains/dscf
025 – Portable Ship Unloader	3,500 ACFM Baghouse	3,500	PM	3.9	0.03 grains/dscf

[1] This baghouse also controls emissions from EU 010.

B.5. Visible Emissions: The permittee shall not cause, permit, or allow any visible emissions (five percent opacity) from any emission unit, transfer point, or activity associated with the cement materials handling operation. [Rule 62-296.711, F.A.C. and Chapter 1-3.52, Rules of the EPC]

TESTING REQUIREMENTS

B.6. Initial Compliance Test: Test the ship unloading operation for visible emissions as follows and annually thereafter to demonstrate compliance with the opacity standard. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Submit the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-297.310(5)(b) and (8)(a)3. and 62-4.070(3), F.A.C. and Ch. 1-3.52(3), Rules of the EPCHC]

A) Test each baghouse associated with EU No. 024 the first time the Siertwell ship unloader, or equivalent, is used.
B) Test each baghouse associated with EU No. 024 within 90 days after being refurbished.
C) Test the portable ship unloader and the associated baghouse (EU No. 025) the first time the Siertwell ship unloader, or equivalent, is used

B.7. Initial Compliance Test: Test the portable ship unloader (EU No. 025) baghouse one time for particulate matter emissions the first time the portable ship unloader is used in order to demonstrate compliance with the allowable emissions specified in Specific Condition No. B.4. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. Submit the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within forty-five days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C. [Rules 62-297.310 and 62-4.070(3), F.A.C. and Ch. 1-3.52(3), Rules of the EPCHC]

B.8. Testing Capacity: Testing of emissions shall be conducted with the source operating at capacity. Capacity is defined as 90-100% of the throughput rates listed in Specific Condition No. B.2. If it is impracticable to test at the testing capacity, an emissions unit may be tested at less than the testing capacity. If an emissions unit is tested at less than the testing capacity, another emissions test shall be conducted and completed no later than 60 days after the emissions unit operation exceeds 110% of the capacity at which its most recent emissions test was conducted. [Rules 62-4.070(3) and 62-297.310(3), F.A.C.]

B.9. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
1	Sample and Velocity Traverses for Stationary Sources

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Method	Description of Method and Comments
2	Determination of Stack Gas Velocity and Volumetric Flow Rate (Type S Pitot. Tube)
3	Gas Analysis for the Determination of Dry Molecular Weight
4	Determination of Moisture Content in Stack Gases
5	Determination of Particulate Matter Emissions from Stationary Sources
9	Visual Determination of the Opacity of Emissions from Stationary 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 EPCHC. [Rules 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

B.10. Test Requirements: At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the air compliance program identified by permit, unless shorter notice is agreed to by the appropriate air compliance program. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. [Rule 62-297.310(9), F.A.C. 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.]

RECORDS AND REPORTS

B.11. Test Reports: 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 following: [Rule 62-297.310(10), F.A.C.]

A) The emission unit number
B) For EU No. 024, the baghouse in operation during the test
C) The throughput rate of the emission unit during the test
D) The method of ship unloading (self-unloading or the Siwertell, or equivalent, ship unloader)
E) The ship unloading line pressure
F) The truck and railcar unloading line pressure

B.12. Operational Data: The permittee shall maintain monthly records for each storage silo loading operation. The records shall be maintained onsite for at least three years and shall be made available to any local, state, or federal air pollution agency upon request. The records shall include, but are not limited to, the following information: [Rule 62-4.070(3) and 62-4.160(14), F.A.C.]

A) Day, Month
B) Amount of cement unloaded from ships (tons)
C) Amount of cement unloaded from railcars and trucks (tons)
D) Hours of operation for each emission unit
E) Rolling twelve month total of B) through D) above.

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