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.

Sent by Electronic mail – Read Receipt Requested

William Kissel
Senior Environmental Manager
Titan America, LLC
455 Fairway Dr Suite 200
Deerfield Beach, FL 33441

Re: Project No. 0571290-020-AC
Titan America, LLC
Replacement of the Two Surge and Charging Vessels' Baghouses

Dear Mr. Kissel:

On September 28, 2018, you submitted an application to replace the baghouses that control particulate matter emissions from the ship unloading surge and charging vessels. Your existing facility is located in Hillsborough County at 5138 Madison Ave., 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:

Titan America, LLC
455 Fairway Dr Suite 200
Deerfield Beach, FL 33441

Authorized Representative:
William Kissel, Senior Environmental Manager

Project No. 0571290-020-AC
Minor Air Construction Permit

Replacement of the Two Surge and Charging Vessels' Baghouses
Hillsborough County, Florida

Facility Location: Titan America, LLC operates the existing facility, which is located in Hillsborough County at 4219 Maritime Blvd. in Tampa, Florida.

Project: This project authorizes the replacement of the baghouses that control particulate matter emissions from the ship unloading surge and charging vessels. 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, 62-210 o 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 the project 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

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.

William Kissel, Titan America, LLC - wkissel@titanamerica.com
Kelly Folsom, Titan America, LLC - kfolsom@titanamerica.com
Max Lee, P.E. – Koogler & Associates, Inc. mlee@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 Nassori 10/25/18

Clerk Date

PUBLIC NOTICE OF INTENT TO ISSUE AIR PERMIT

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY
Draft Air Permit No. 0571290-020-AC
Titan America, LLC
Hillsborough County, FL

Applicant: The applicant for this project is Titan America, LLC. The applicant's authorized representative and mailing address is: William Kissel, Senior Environmental Manager, 455 Fairway Dr Suite 200, Deerfield Beach, FL 33441.

Facility Location: The facility operates the existing bulk material handling facility, which is located in Hillsborough County at 4219 Maritime Blvd. in Tampa, Florida.

Project: This permit authorizes the replacement of the baghouses that control particulate matter emissions from the surge and charging vessels. The vessels are used to transfer the material from the ship unloading equipment to the onshore storage silos. 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 the project 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

Titan America, LLC
4219 Maritime Blvd.
Tampa, Florida 33605

Facility ID No. 0571290

PROJECT

Project No. 0571290-020-AC
Application for Minor Source Air Construction Permit
Replacement of the Two Surge and Charging Vessels' Baghouses

COUNTY

Hillsborough County, Florida

PERMITTING AUTHORITY

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

October 25, 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

Titan America, LLC is an existing bulk 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 4219 Maritime Blvd., Tampa, Florida 33605. The UTM coordinates of the facility are Zone 17, 359.94 km East, and 3087.81 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 permit authorizes the replacement of the baghouses that control particulate matter emissions from the Surge and Charging Vessel Nos. 1 and 2 (EU Nos. 011 and 012). The new baghouses will be 3,000 DSCFM Donaldson, Model No. DLM V30/15F, baghouses, or equivalent. The increase in the airflow rate of the baghouses results in an increase in facility-wide potential particulate matter emissions from 92.0 tons/year to 95.6 tons/year.

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

EU No.	Emission Unit Description
011	Surge and Charging Vessels Baghouse No. 1
012	Surge and Charging Vessels Baghouse No. 2

Processing Schedule

September 28, 2018 - Received the application for a minor source air pollution construction permit.
Not Applicable - Requested additional information.
September 28, 2018 - Application Complete.

2. DEPARTMENT REVIEW

Titan America, LLC is a bulk material handling facility. The bulk materials are received by ship, truck, and railcar. When receiving material by ship, ships are unloaded using a barge mounted ship unloading system which consists of a vertical screw auger, a screw conveyor, a surge vessel, and a pneumatic transfer operation system with four charging vessels.

The vertical screw auger is used to remove the materials from the shiphold. At the top of the vertical screw auger, the materials are transferred to a horizontal screw conveyor and then into the surge vessel. The screw auger and screw conveyor have a maximum materials unloading capacity of 440 tons per hour (TPH). From the surge vessel, the materials are pneumatically loaded into one of four charging vessels.

Compressed air is used to pressurize the charging vessels. Once pressurized, the materials are pneumatically transferred to the onshore filter/receiver, which directs material to the four main silos and/or the two interstitial silos. The surge vessel(s) to the silo(s) transfer operation has a maximum transfer rate of 881 tons/hour.

The particulate matter emissions from the loading of the surge vessel by the screw conveyor system and from the pneumatic loading of the charging vessels (EU Nos. 011 and 012), will be controlled using two 3,000 DSCFM Donaldson, Model No. DLM V30/15F, baghouses, or equivalent. The PM emissions from the onshore filter/receiver are controlled by the 25,000 DSCFM Schmidt, Model No. 398FR12(6), jet pulse baghouse. In addition, the PM emissions from the interstitial silos are controlled by each silo's 1,790 DSCFM Schmidt Airtech, Model No. 48DS8FM, jet pulse baghouse (EU Nos. 006 and 007).

The potential PM emissions from each surge and charging vessel baghouse are calculated to be 3.4 tons/year, for a total of 6.8 tons/year, based on the 3,000 dscf airflow rate of each baghouse, 8,760 hours of operation for each baghouse, and a grain loading standard of 0.03 gr/dscf. The increase in the airflow rate of the baghouses results in an increase in facility-wide potential particulate matter emissions from 92.0 tons/year to 95.6 tons/year.

The facility is subject to Rule 62-296.711, F.A.C. - Materials Handling, Sizing, Screening, Crushing and Grinding Operations and Ch. 1-3, Rules of the EPCHC.

Summary of Emissions

Particulate Matter (PM) Emissions

EU No.	Description	Potential Emissions (TPY)	Actual Emissions (TPY)	Increase in Emissions (TPY)	Allowable Emissions
011	Surge and Charging Vessels Baghouse No. 1	3.4	0.2	3.2	0.03 gr/dscf and 5% opacity
012	Surge and Charging Vessels Baghouse No. 2	3.4	0.2	3.2	0.03 gr/dscf and 5% opacity

- The actual emissions are based on the average of 2016 and 2017 AOR data.
- The potential PM emissions from each emission unit are based on the allowable PM emissions rate of 0.03 gr/dscf, an airflow rate of 3,000 DSCFM for each baghouse, and 8,760 hours of operation for each emission unit.
- The facility-wide PM emissions are calculated to be 95.6 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

Titan America, LLC
4219 Maritime Blvd.
Tampa, Florida 33605

Authorized Representative:
William Kissel, Senior Environmental Manager

Air Permit No. 0571290-020-AC
Expiration Date: December 30, 2019

Replacement of the Two Surge and Charging Vessels' Baghouses
Hillsborough County, Florida

PROJECT

This is the draft air construction permit, which authorizes the replacement of the two baghouses that control particulate matter emissions from the surge and charge vessels (EU Nos. 011 and 012). The proposed work will be conducted at the existing facility, which is a bulk material handling facility categorized under Standard Industrial Classification No. 5032 – Brick, Stone & Related Construction Materials. The existing facility is located in Hillsborough County at 4219 Maritime Blvd., Tampa, Florida 33605. The UTM coordinates are Zone 17, 359.94 km East, and 3087.81 km North.

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 EPCHC.

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.

William Kissel, Titan America, LLC - wkissel@titanamerica.com
Kelly Folsom, Titan America, LLC - kfolsom@titanamerica.com
Max Lee, P.E. – Koogler & Associates, Inc. mlee@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.

_____ _____

Clerk Date

DRAFT

FACILITY DESCRIPTION

Titan America, LLC is a bulk material handling facility. The bulk materials are received by ship, truck, and railcar. When receiving material by ship, ships are unloaded using a barge mounted ship unloading system which consists of a vertical screw auger, a screw conveyor, a surge vessel, and a pneumatic transfer operation system with four charging vessels.

The vertical screw auger is used to remove the materials from the shiphold. At the top of the vertical screw auger, the materials are transferred to a horizontal screw conveyor and then into the surge vessel. The screw auger and screw conveyor have a maximum materials unloading capacity of 440 tons per hour (TPH). From the surge vessel, the materials are pneumatically loaded into one of four charging vessels.

Compressed air is used to pressurize the charging vessels. Once pressurized, the materials are pneumatically transferred to the onshore filter/receiver, which directs the material to the four main silos and/or the two interstitial silos. The surge vessel(s) to the silo(s) transfer operation has a maximum transfer rate of 881 tons/hour.

The particulate matter emissions from the loading of the surge vessel by the screw conveyor system and from the pneumatic loading of the charging vessels (EU Nos. 011 and 012), will be controlled using two 3,000 DSCFM Donaldson, Model No. DLM V30/15F, baghouses, or equivalent. The PM emissions from the onshore filter/receiver are controlled by the 25,000 DSCFM Schmidt, Model No. 398FR12(6), jet pulse baghouse. In addition, the PM emissions from the interstitial silos are controlled by each silo's 1,790 DSCFM Schmidt Airtech, Model No. 48DS8FM, jet pulse baghouse (EU Nos. 006 and 007).

This project will modify the following emissions units.

EU No.	Emission Unit Description
011	Surge and Charging Vessels Baghouse No. 1
012	Surge and Charging Vessels Baghouse No. 2

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.
- The facility is not a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

DRAFT

FW.1. Materials Limitation: When used in this permit the term Concrete Raw Materials is defined as Portland Cement Types I, II, III, IV, V, white cement, masonry cement, flyash, slag cement, natural and synthetic gypsum, lime, cement kiln dust, natural pozzolana, and artificially produced pozzolana materials. The facility may also handle bauxite through the pneumatic concrete raw materials handling system and the pneumatic ship loading system. [Rule 62-4.070(3), F.A.C. and Permit Nos. 0571209-009-AC and 0571290-017-AC]

FW.2. 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.

FW.3. 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.

FW.4. 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).

FW.5. 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.

FW.6. 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.]

FW.7. 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 EPCHC. 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.]

FW.8. 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) and (4), 62-4.080 & 62-210.300(1), F.A.C.]

FW.9. 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 90 days of completion of testing of each new dust collector associated with EU Nos. 011 and 012, 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.]

FW.10. 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

DRAFT

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 Department by phone at (850) 717-9000 or email at eaor@dep.state.fl.us}

FW.11. Special Compliance Tests: 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]

FW.12. Baghouse Pressure Drop Monitoring: Each baghouse shall have a device capable of monitoring the pressure differential across the baghouse. The monitoring device shall be maintained in working order and shall be calibrated and adjusted to indicate the true value of the pressure drop with sufficient accuracy to allow the pressure drop to be determined within 10% of its true value. [Rules 62-4.070(3) and 62-297.310(6)(a) and (b), F.A.C. and Permit No. 0571209-009-AC]

FW.13. Baghouse Maintenance: The baghouses controlling the sources under this permit shall be kept in good repair. [Rule 62-4.070(3), F.A.C. and Permit No. 0571209-009-AC]

FW.14. Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly. [Rule 62-210.650, F.A.C.]

FW.15. Unconfined Emissions of Particulate Matter: 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) Use covers or wind shields at the shiphold, as necessary, to meet the opacity standard.
B) Attend to major operational upsets promptly and effectively. Stop operation, if necessary.
C) Curtail operations during high wind conditions, if necessary.
D) On days when the equipment is in use, inspect the screw auger and screw conveyor for visible emissions daily. Record any problems and actions taken.
E) Maintain trafficked areas clean. Post a sign to limit vehicle speeds to 10 miles per hour.
F) Exercise good housekeeping practices at all times.
G) Paving or maintenance of roads, parking areas, and yards.
H) Application of asphalt, water, oil, chemicals or other dust suppressants to unpaved roads, yards, and open stock piles, as necessary.
I) Removal of particulate matter from roads and other paved areas under control of the owner or operator to prevent re-entrainment and from building or work areas to prevent particulates from becoming airborne, as necessary.

DRAFT

FW.16. 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.]

FW.17. 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.]

DRAFT

A. EU Nos. 011 and 012 – Surge and Charging Vessels Nos. 1 and 2

This section of the permit addresses the following emissions units.

EU No.	Emission Unit Description
011	Surge and Charging Vessel Baghouse No. 1
012	Surge and Charging Vessel Baghouse No. 2

EQUIPMENT

A.1. Equipment Name: The permittee is authorized to install two 3,000 DSCFM Donaldson, Model No. DLM V30/15F, baghouses, or equivalent. [Application No. 0571290-020-AC]

PERFORMANCE RESTRICTIONS

A.2. Permitted Capacity: The following limitations shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C. and Permit No. 0571290-013-AC]

A) The maximum throughput of concrete raw materials and bauxite shall not exceed 750,000 tons per any twelve consecutive month period.
B) Each emission unit is authorized to operate continuously (8,760 hours/year).

EMISSIONS STANDARDS

A.3. Emissions Standards: The maximum potential and allowable particulate matter emissions shall not exceed the following per any twelve consecutive month period: [Rule 62-296.711(2)(b), F.A.C. and Application No. 0571290-020-AC]

EU No.	DSCFM	Potential Emissions (Tons/yr)	Allowable Emissions
011	3,000	3.4	0.03 grains/dscf
012	3,000	3.4	0.03 grains/dscf

A.4. Operating Limitations: The following restrictions and limitations shall apply to ensure compliance with Specific Condition No. A.5.: [Rule 62-4.070(3), F.A.C. and Permit No. 0571290-009-AC]

A) Open holds on the delivery vessel shall be tarped as necessary.
B) Front-end loaders, bulldozers, etc. may be used in any open shiphold to help collect the final twelve inches of concrete raw materials which remains at the bottom of the shiphold. Manual sweeping may be used as well, but no blowers are allowed.
C) During high wind conditions, all of the shipholds filled with concrete raw materials shall be completely enclosed with a tarp or a permanent hatch.

A.5. Emissions Standards: The permittee shall not cause, permit, or allow any visible emissions (5% opacity) from Emission Unit Nos. 011 and 012. [Rule 62-296.711(2)(a), F.A.C. and Ch. 1-3.52(2) Rules of the EPCHC]

TESTING REQUIREMENTS

A.6. Initial Compliance Test: Test each emission unit for visible emissions within 60 days of startup and annually thereafter, to demonstrate compliance with the opacity standard. Each VE test shall be a minimum of 30 minutes in duration and as specified in Specific Condition No. A.8. 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. [Rule 62-297.310(8)(a)3., F.A.C. and Ch. 1-3.52(3), Rules of the EPCHC]

A.7. Initial Visible Emissions Test (Bauxite): In addition to the testing specified in Specific Condition No. A.6., test each emissions unit for visible emissions when handling bauxite for the first time. Each VE test shall be a minimum of 30 minutes in duration and as specified in Specific Condition No. A.8. 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 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.]

A.8. Testing Capacity: Testing of emissions shall be conducted with the source operating at capacity and as follows. 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) Capacity is defined as 90-100% of the rated capacity of 881 TPH for the ship unloading transfer rate into the filter/receiver and 440 TPH for the ship unloading transfer rate into each interstitial silo.
B) The test shall be representative of the operating conditions during the year, however, the maximum operation is while all four unloading lines are in operation.
C) Test the surge vessel and four charging vessels at their respective baghouses' exhaust stacks.

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. [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.]

A.10. 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. [Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

RECORDS AND REPORTS

A.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) The unloading rate (tons/hour)
C) The baghouse pressure drop
D) The number of unloading lines in operation during the test

A.12. Records: In order to demonstrate compliance with Specific Condition No. A.2., the permittee shall maintain a monthly recordkeeping system for the most recent three year period. However, the facility should maintain daily records and make them available upon request. 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)(b), F.A.C.]

A) Month, Year
B) Amount and type of material unloaded (tons)
C) Hours of operation of each Emission Unit
D) Twelve month rolling total of B) and C) above