Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

E-CORRESPONDENCE
jim.ruddell@lhoist.com

Jim Ruddell, Environmental Director
Franklin Industrial Minerals
9020 Overlook Blvd., Suite 200
Brentwood, TN 37027

Re: Project No. 0830016-013-AC
Material Handling System Modification
Synthetic Minor Air Construction Permit

Dear Mr. Ruddell:

On January 25, 2010, you submitted an application to authorize the modification of pickup points of existing dust control at the No. 1 Granular System, the removal of a Bagging System including the baghouse, modification of pickup points of the existing dust collection at the Granular Loadout Area, and the addition of a dust collector at the Granular Loadout Area. Additionally, the amount of fuel oil allowed to be combusted by the fluidized bed dryer and rotary dryer is being lowered from 3.6 million gallons to 2.8 million gallons. This facility is located in Marion County at 11661 NW Gainesville Road, Ocala, Florida. Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit and Appendices; the Written Notice of Intent to Issue Air Permit; and the Public Notice of Intent to Issue Air Permit. 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 the project engineer, Jeffrey Rustin, P.E. at 407-893-3335.

Sincerely,

Caroline D. Shine

Caroline D. Shine
Program Administrator
Air Resource Management

4/15/10
Date

JR/tla
Enclosures
Copy: Robert Kehrman, P.E., **(robert.kehrman@lhoist.com)**

WRITTEN NOTICE OF INTENT TO ISSUE AIR PERMIT

In the Matter of an
Application for Air Permit by:

Franklin Industrial Minerals
9020 Overlook Blvd., Suite 200
Brentwood, TN 37027

Authorized Representative:
Jim Ruddell, Environmental Manager

Project No. 0830016-013-AC
Minor Air Construction Permit
Lowell Plant
Marion County, Florida
Material Handling System
Modification

Facility Location: Franklin Industrial Minerals operates the existing Lowell Plant (Limestone Mining, Drying, and Processing Facility) located at 11661 NW Gainesville Road, Ocala, Marion County, Florida.

Project: The purpose of the construction permit is to authorize the modification of pickup points of existing dust control at the No. 1 Granular System, the removal of a Bagging System including the baghouse, modification of pickup points of the existing dust collection at the Granular Loadout Area, and the addition of a dust collector at the Granular Loadout Area. Additionally, the amount of fuel oil allowed to be combusted by the fluidized bed dryer and rotary dryer was lowered from 3.6 million gallons to 2.8 million gallons. This facility is a source of air emissions. 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, 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 Department of Environmental Protection's Air Resource Section in the Central District Office. The Permitting Authority's physical address is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803. The Permitting Authority's mailing address is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803. The Permitting Authority's telephone number is 406/894-7555.

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 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.

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 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 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. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). 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. 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, and telephone number of the petitioner; the name, address and telephone 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 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 Orlando, Florida.

Caroline D. Shine
Program Administrator
Air Resource Management

4/15/10
Date

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 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) 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 April 15, 2010 to the persons listed below.

Jim Ruddell, Environmental Director, **(jim.ruddell@lhoist.com)**
Robert Kehrman, P.E., **(robert.kehrman@lhoist.com)**

Clerk Stamp

FILED, on this date, pursuant to Section 120.52, F. S, with the designated Department Clerk, receipt of which is hereby acknowledged.

Clerk

4/15/2010
Date

PUBLIC NOTICE OF INTENT TO ISSUE AIR CONSTRUCTION PERMIT

Florida Department of Environmental Protection
Air Resource Section, Central District Office
Draft Minor Source Air Construction Permit
Project No. 0830016-013-AC
Franklin Industrial Minerals – Lowell Plant (Limestone Mining, Drying, and Processing Facility)
Marion County, Florida

Applicant: The applicant for this project is Franklin Industrial Minerals. The applicant's authorized representative and mailing address is: Jim Ruddell, Environmental Manager, Franklin Industrial Minerals, 9020 Overlook Blvd., Suite 200, Brentwood, TN 37027.

Facility Location: Franklin Industrial Minerals operates the existing Lowell Plant (Limestone Mining, Drying, and Processing Facility) located at 11661 NW Gainesville Road, Ocala, Marion County, Florida.

Project: The purpose of the construction permit is to authorize the modification of pickup points for existing dust control at the Baghouse controlling No. 1 granular system, the removal of a Bagging System including the baghouse, modification of pickup points for the existing dust collection at the Granular Loadout Area, and the addition of a dust collector at the Granular Loadout Area. Additionally, the amount of fuel oil allowed to be combusted by the fluidized bed dryer and rotary dryer is being lowered from 3.6 million gallons to 2.8 million gallons. This facility is a source of air 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 Department of Environmental Protection's Air Resource Section in the Central District Office. The Permitting Authority's physical address is: 3310 Maguire Blvd., Suite 232, Orlando, Florida 32803. The Permitting Authority's mailing address is: 3310 Maguire Blvd., Suite 232, Orlando, Florida 32803. The Permitting Authority's telephone number is 407/894-7555.

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: http://www.dep.state.fl.us/air/eproducts/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 this 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. The petition must contain the information set forth below and must be filed with (received by) the Department's Agency Clerk in the Office of General Counsel of the Department of Environmental Protection at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000 (Telephone: 850/245-2241). 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 this 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. 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 and telephone number of the petitioner; the name address and telephone 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 rights will be affected by the agency determination; (c) A statement of when and how the 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 for this proceeding.

(Public Notice to be Published in the Newspaper)

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

Franklin Industrial Minerals
9020 Overlook Blvd., Suite 200
Brentwood, TN 37027

Lowell Plant (Limestone Mining, Drying, and Processing Facility)
Facility ID No. 0830016

PROJECT

Project No. 0830016-013-AC
Application for Minor Source Air Construction Permit
Material Handling System Modification

COUNTY

Marion, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air Resource Section
Central District Office
3319 Maguire Blvd., Suite 232
Orlando, FL 32803

April 14, 2010

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 Rules 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 on a quarterly basis in Rule 62-204.800, F.A.C.

Facility Description and Location

Franklin Industrial Minerals operates the Lowell Plant (Limestone Mining, Drying, and Processing Facility). The facility is categorized under Facility Major Group Standard Industrial Classification Code No. 1422. The facility is located in Marion County at 11661 NW Gainesville Road in Ocala, Florida. The UTM coordinates are Zone 17, 384.70 km East, and 3244.20 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to state and federal Ambient Air Quality Standards (AAQS).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is not a Title V major source of air pollution in accordance with Chapter 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.
- This permit also constitutes compliance with new source performance standards.
- This facility is classified as a synthetic minor (non-Title V) facility.

Project Description

The purpose of the construction permit is to authorize the modification of pickup points of existing dust control at the No. 1 Granular System, the removal of a Bagging System including the baghouse, modification of pickup points of the existing dust collection at the Granular Loadout Area, and the addition of a dust collector at the Granular Loadout Area.

Processing Schedule

01/25/10 Received the application for a minor (synthetic non-Title V) source air pollution construction permit.
01/25/10 Application is complete.

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Department regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, F.A.C. Under preconstruction review, the Department first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, must conduct a PSD preconstruction review. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

Once it is determined that a project is subject to PSD preconstruction review, the project emissions are compared to the "significant emission rates" defined in Rule 62-210.200, F.A.C. for the following pollutants: carbon monoxide (CO); nitrogen oxides (NO_X); sulfur dioxide (SO_2); particulate matter (PM); particulate matter with a mean particle diameter of 10 microns or less (PM_{10}); volatile organic compounds (VOC); lead (Pb); fluorides (Fl); sulfuric acid mist (SAM); hydrogen sulfide (H_2S); total reduced sulfur (TRS), including H_2S; reduced sulfur compounds, including H_2S; municipal waste combustor organics measured as total tetra- through octa-chlorinated dibenzo-p-dioxins and dibenzofurans; municipal waste combustor metals measured as particulate matter; municipal waste combustor acid gases measured as SO_2 and hydrogen chloride (HCl); municipal solid waste landfills emissions measured as non-methane organic compounds (NMOC); and mercury (Hg). In addition, significant emissions rate also means any emissions rate or any net emissions increase associated with a major stationary source or major modification which would construct within 10 kilometers of a Class I area and have an impact on such area equal to or greater than 1 $\mu g/m^3$, 24-hour average.

If the potential emission exceeds the defined significant emissions rate of a PSD pollutant, the project is considered "significant" for the pollutant and the applicant must employ the Best Available Control Technology (BACT) to minimize the emissions and evaluate the air quality impacts. Although a facility or project may be *major* with respect to PSD for only one regulated pollutant, it may be required to install BACT controls for several "significant" regulated pollutants.

PSD Applicability for Project

The existing permitted facility both prior to and after the emissions associated with this construction permit has potential emissions less than the PSD major stationary source threshold of 250 tons/yr. of any regulated air pollutant. Therefore, the existing permitted facility is not *major* for PSD and is not *subject* to PSD. The "significant emissions rates" are not applicable until *after* the facility has permitted potential emissions above the PSD major stationary source threshold. When facility potential emissions exceed 250 tons/yr. for any regulated air pollutant future increases in potential emissions will be subject to PSD preconstruction review if "significant emission rates" are exceeded.

As provided in the application, the following table summarizes potential emissions and PSD applicability for the project.

Table A. Potential Emissions (Tons/Year) and PSD Applicability

Pollutant	Project Potential Emissions (TPY)	Significant Emissions Rate (TPY)	Subject To PSD?
NO_X	-22.0	40	No
PM/PM_{10}	-2.4	25/15	No
SO_2	-6.2	40	No

Removal of the bagging system will reduce potential particulate emissions 3.8 TPY. The addition of the new dust collector will increase potential particulate emissions 1.4 TPY. The net change is a reduction of potential particulate emission by 2.4 TPY. It has been decided to lower the facility allowable total fuel oil usage limit from 3.6 million gallons per year to 2.8 million gallons per year. The facility potential to emit NO_X emissions are being lowered from 99.0 tons per year to 77.0 tons per year and the facility potential to emit SO_2 emissions are being are lowered from 27.6 tons per year to 21.4 tons per year. Additional reductions in potential particulate emissions result from the decrease in fuel oil usage, but those reductions are not included in the above chart. As shown in the above table, total project emissions will not exceed the PSD significant emissions rates; therefore, the project is not subject to PSD preconstruction review.

3. APPLICATION REVIEW

Discussion of Emissions

The new dust collector to be added to the existing loadout has a potential to emit of 1.4 tons per consecutive 12 months. The total potential to emit particulate emissions from the baghouses of the Material Handling System will be 39.2 tons of particulate per consecutive 12 months period after removal of the bagging system and addition of the new dust collector, assuming operation 8760 hours. The total potential to emit particulate emissions from the fluidized bed dryer operating at 8408.4 hours (2.8 million gallons of fuel oil) are 29.3 tons of particulate per consecutive 12 months period. Facility total potential to emit particulate emissions are 68.5 tons of particulate per consecutive 12 months period, assuming removal of bagging system, addition of the new dust collector, and the rotary dryer is not operating. Basis of calculations for particulate emissions (potential to emit): DSCFM X 0.020 grains X 60 min/hr X 1 lb/7,000 grains = lb/hr; lb/hr X hours operated/2,000 = TPY. The Fluidized Bed Dryer and the Rotary Dryer are subject to the Rule 62-296.320(4)(a)(2), Process Weight Table 296.320-1, F.A.C.; however, the requirement to conduct particulate testing for the Fluidized Bed Dryer and the Rotary Dryer **is waived** if compliance with the visible emission standard of 5 percent opacity is demonstrated.

The current facility NO_X emission limit is 99.0 tons/yr. AP-42 factors and the amount of fuel combusted are used to determine the potential to emit NO_X emissions. There are no compliance testing requirements for NO_X emissions. It has been decided to lower the facility allowable total fuel oil usage limit from 3.6 million gallons per year to 2.8 million gallons per year. The facility potential to emit NO_X emissions are being lowered from 99.0 tons per year to 77.0 tons per year and the facility potential to emit SO_2 emissions are being are lowered from 27.6 tons per year to 21.4 tons per year. Potential to Emit SO_2 emissions for the Fluidized Bed Dryer and Rotary Dryer when using fuel oil: AP 42 factor (157 lb/mgal) multiplied by the sulfur percent of the fuel oil being combusted multiplied by SO_2 emission reduction factor (calculated using the removal efficiency based on previous testing (100% - 95%)) multiplied by the fuel oil usage multiplied by hours operated. Potential to Emit SO_2 emissions for the Fluidized Bed Dryer and Rotary Dryer when using Natural Gas: AP 42 factor (0.6 lbs/mmcf) multiplied by the natural gas usage multiplied by hours operated. Potential to Emit SO_2 emissions for the Fluidized Bed Dryer and Rotary Dryer when using propane: AP 42 factor (.10S lb/mgal) multiplied by the propane usage multiplied by hours operated. S equals the sulfur content of the propane expressed in gr/100 ft^3. Potential to Emit NO_X emissions for the Fluidized Bed Dryer and Rotary Dryer when using Fuel Oil: AP 42 factor (55 lbs/mgallons) multiplied by the fuel oil usage multiplied by hours operated. Potential to Emit NO_X emissions for the Fluidized Bed Dryer and Rotary Dryer when using Natural Gas: AP 42 factor (100 lbs/mmcf) multiplied by the natural gas usage multiplied by hours operated. Potential to Emit NO_X emissions for the Fluidized Bed Dryer and Rotary Dryer when using propane: AP 42 factor (13 lbs/mgallons) multiplied by propane usage multiplied by hours operated.

State Requirements

Rule 62-210.200(242), F.A.C. (potential to emit) and Rule 62-210.300(1), F.A.C. (air construction permits).

Federal NSPS Provisions

The Baghouse controlling No. 1 granular system, the Baghouse controlling No. 2 granular system, and the Baghouse controlling Ball Mill and feed silo are subject to the provisions of 40 CFR Part 60, Subpart A - General Provisions and 40 CFR Part 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants.

Federal NESHAP Provisions

N/A

Other Draft Permit Requirements

N/A

4. PRELIMINARY DETERMINATION

The Department 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. Jeffrey Rustin, P.E is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection, 3319 Maguire Blvd., Suite 232, Orlando, FL 32803; 407-893-3335.

Florida Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Charlie Crist
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Secretary

DRAFT PERMIT

E-CORRESPONDENCE
jim.ruddell@lhoist.com

PERMITTEE
Franklin Industrial Minerals
9020 Overlook Blvd., Suite 200
Brentwood, TN 37027

Authorized Representative:
Jim Ruddell, Environmental Director

Air Permit No. 0830016-013-AC
Permit Expires: September 30, 2011

Lowell Plant (Limestone Mining, Drying, and Processing Facility)
Synthetic Minor Air Source
Construction Permit
Material Handling System Modification

This is the **DRAFT** air construction permit which authorizes the modification of pickup points for existing dust control, the removal of a Bagging System including the baghouse, and the addition of a dust collector. Additionally, the facility potential to emit NO_X emissions are being lowered to 77.0 tons per year and the facility potential to emit SO_2 emissions are being are lowered to 21.4 tons per year. The proposed work will be conducted at the Lowell Plant, which is a Limestone Mining, Drying, and Processing Facility (Standard Industrial Classification No. 1422). The facility is located in Marion County at 11661 NW Gainesville Road in Ocala, Florida. The UTM coordinates are Zone 17, 384.70 km East, and 3244.20 km North.

This permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A, Section 4, of this permit.

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 permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the

notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orlando, Florida

_____
Caroline D. Shine
Program Administrator
Air Resource Management

_____
Date

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this **DRAFT** 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 _____ to the persons listed below.

Jim Ruddell, Environmental Director, **(jim.ruddell@lhoist.com)**
Robert Kehrman, P.E., **(robert.kehrman@lhoist.com)**

Clerk Stamp

FILED on this date, pursuant to Section 120.52 F.S., with the designated Department Clerk, receipt of which is hereby acknowledged.

_____ _____
Clerk Date

FACILITY AND PROJECT DESCRIPTION

Existing Facility

The facility is the Lowell Plant. The existing facility consists of the following emissions units.

Facility ID No. 0830016	
ID No.	**Emission Unit Description**
001	**66" Raymond Mill** equipped with a Flex-Kleen, Model 100 WRBS-48 III baghouse with a particulate control efficiency of approximately 99%.
002	**Baghouse controlling No. 1 granular system** - The dry limestone crushing operation utilizing a Mikro-Pulsaire Model 196 TRH-8-20 baghouse having an air to cloth ratio of 4 to 1 to control particulate emissions from 19 locations.
003	**Bagger System** - The dry limestone crushing operation utilizing a Mikro-Pulsaire Model 144 TRH-8-20 baghouse to control particulate emissions from 10 locations.
004	**Baghouse controlling No. 2 granular system** - Particulate emissions from material transfer is controlled by a Flex Kleen baghouse.
005	**Limestone Fluidized Bed Dryer** fired by No. 2, No. 5, No. 6 fuel oil, propane or natural gas. The dryer is equipped with a MAC Equip. Model 144RPT728 baghouse having an air to cloth ratio of 5.5 to 1 to control particulate emissions.
006	**Rotary Dryer** whose particulate emissions controlled by two cyclones and a wet scrubber
007	**Fine Grind Loadout Area D-1** - Particulate emissions are controlled by a Todd baghouse and two loadout dust collectors.
008	**73" Raymond Mill** equipped with a Model 100 WRBS-64 Arrangement III Flex Kleen baghouse with a particulate control efficiency of approximately 99%.
009	**Truck Blow-Off Bin** equipped with a free flow model PJ-P25-EB-10 baghouse having an air to cloth ratio of 4 to 1 to control particulate emissions.
011	**Granular Loadout Area D2** equipped with baghouse D-2, a MAC Equip. Model 96LST144, having an air to cloth ratio of 4.1 to 1 to control particulate emissions at the silo/truck and rail loading areas.
012	**Silo #5** equipped with a Flex-Kleen, Model 100 BUBS-25 baghouse.
013	**Baghouse controlling ball mill and feed silo**, a 50 ton separator, and a free flow bag house and a Griffin bag house, having an air to cloth ratio of 5 to 1 to control particulate emissions. The emission is subject to 40 CFR 60.672, Subpart 000.

Proposed Project

The project authorizes the modification of pickup points for existing dust control at the Baghouse controlling No. 1 granular system (Emission Unit No. 002, ID No. 002), removal of the Bagging System including the baghouse (Emission Unit No. 003, ID No. 003), modification of pickup points for the existing dust collection at the Granular Loadout Area (Emission Unit No. 11, ID No. 011), and the addition of a dust collector to the existing loadout spout in the Granular Loadout Area (Emission Unit No. 11, ID No. 017). Additionally, the facility potential to emit NO_X emissions are being lowered to 77.0 tons/yr. per year and the facility potential to emit SO2 emissions are being lowered to 21.4 tons per year.

Facility ID No. 0830016		
ID No.	**Action**	**Emission Unit Description**
002	**Modify**	**Baghouse controlling No. 1 granular system** - The dry limestone crushing operation utilizing a Mikro-Pulsaire Model 196 TRH-8-20 baghouse having an air to cloth ratio of 4 to 1 to control particulate emissions from 19 locations.
003	**Remove**	**Bagger System** - The dry limestone crushing operation utilizing a Mikro-Pulsaire Model 144 TRH-8-20 baghouse to control particulate emissions from 10 locations.
011	**Modify**	**Granular Loadout Area D2** equipped with baghouse D-2, a MAC Equip. Model 96LST144, having an air to cloth ratio of 4.1 to 1 to control particulate emissions at the silo/truck and rail loading areas.

FACILITY REGULATORY CLASSIFICATION

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no 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 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400 (PSD), F.A.C.
- This permit also constitutes compliance with new source performance standards.
- This facility is classified as a synthetic minor (non-Title V) facility.

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection, Central District Office. The Central District Office's mailing address is 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The phone numbers for Permitting Section are 407-893-3335 or 407-893-3334. All documents related to applications for permits to operate an emissions unit shall be submitted to the Central District Office.

2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Central District Office. The mailing address of the Central District Office is: 3319 Maguire Blvd., Suite 232, Orlando, Florida 32803-3767. The phone number for Compliance Section is 407-893-3333.

3. Appendices: The following Appendices are attached as part of this permit:

   a. Appendix A. Citation Formats and Glossary of Common Terms;

   b. Appendix B. General Conditions;

   c. Appendix C. Common Conditions; and

   d. Appendix D. Common Testing Requirements.

   e. Appendix E. 40 CFR Part 60, Subpart A – General Provisions

   f. Appendix F. 40 CFR Part 60, Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants

4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.

5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]

6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

7. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification. [Rule 62-212.400(12), F.A.C.]

8. Permit Application: The construction/modification shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, he must notify the Department in writing at least 90 days prior to the expiration of the construction permit and submit an application for an extension of the construction permit.

   An operating permit revision is required. To obtain an operating permit, the permittee must demonstrate compliance with the conditions of the construction permit and submit the application fee, along with compliance test results, and an Application for Air Permit to the Department's Central Florida District office [Rule 62-4.220, F.A.C.]. **The application shall be submitted no later 180 days after the permitted construction/modifications have been completed and the emission units and control equipment have been placed in operation.**

A. Drying System

This section of the permit addresses the following emissions unit.

ID No.	Emissions Units Description
005	**Limestone Fluidized Bed Dryer** fired by No. 2, No. 5, No. 6 fuel oil, propane or natural gas. The dryer is equipped with a MAC Equip. Model 144RPT728 baghouse having an air to cloth ratio of 5.5 to 1 to control particulate emissions.
006	**Rotary Dryer** whose particulate emissions controlled by two cyclones and a wet scrubber

EQUIPMENT

1. Equipment Name: The Fluidized Bed Dryer is equipped with a MAC Equipment Model 144RPT728 baghouse having an air to cloth ration of 5.5 to 1 to control particulate emissions.

2. Equipment Name: The Rotary Dryer has two cyclones and a wet scrubber to control particulate emissions.

PERFORMANCE RESTRICTIONS

3. Restricted Operation: The hours of operation of are not limited (8760 hours per year). [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

4. Restricted Operation: The facility is permitted to operate not to exceed the following limitations per any consecutive twelve months period, as requested by the applicant:

Unit	Process Rate (tons)	*Fuel Oil Usage (million gals.)	% Sulfur
a) Fluidized Bed Dryer	946,800	See Specific Conditions No. 5 and 6	1.95
b) Rotary Dryer	438,000	See Specific Conditions No. 5 and 6	1.95

The maximum operating rate for the fluid bed dryer is 112 tons per hour and for the rotary dryer is 50 tons per hour. [Rule 62-210.200(PTE), F.A.C.]

5. Restricted Operation: If burning only one (1) type of fuel during a consecutive twelve month period, the consecutive twelve months period amount of fuel burned by the fluidized bed dryer and rotary dryer combined (total, both dryers) shall not exceed 2.8 million gallons of fuel oil with a sulfur percentage not greater than 1.95 percent, 420 million standard cubic feet of natural gas, or 4.6 million gallons of propane. [Rule 62-210.200(PTE), F.A.C.]

6. Restricted Operation: If burning more than one (1) type of fuel during a consecutive twelve months period, the sum of the following three (3) ratios shall not exceed one (1) during a consecutive twelve months period.

   a) $\frac{\text{consecutive twelve-months amount of fuel oil* burned by the fluidized bed dryer and rotary dryer}}{\text{2.8 million gallons of fuel oil}}$

   * fuel oil with a sulfur percentage not greater than 1.95 percent

   b) $\frac{\text{consecutive twelve-months amount of natural gas burned by the fluidized bed dryer and rotary dryer}}{\text{420 million standard cubic feet of natural gas}}$

c) consecutive twelve-months amount of propane burned by the fluidized bed dryer and rotary dryer
4.6 million gallons of propane

[Rule 62-210.200(PTE), F.A.C.]

5. **Restricted Operation: The Rotary Dryer shall not operate without first obtained an air construction permit for a baghouse to control the emissions, and having the baghouse in operation. [Rule 62-4.070, F.A.C. and correspondence from Franklin Industrial Minerals dated April 6, 2010]**

EMISSIONS LIMITS AND STANDARDS

6. Reasonable Precautions of Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter (PM). These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing, and handling. Reasonable precautions to be taken shall include, but not be limited to the following:
   A. Paving and maintenance of roads, parking areas, and yards;
   B. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing;
   C. Application of asphalt, water, oil, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities;
   D. Removal of PM from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from building(s) or work areas to prevent particulate from becoming airborne;
   E. Landscaping or planting of vegetation; and
   F. Sprinkling with water shall be used as necessary on paved areas, unpaved areas, stockpiles, and during loading/unloading operations. [Rules 62-4.070(3) and 62-296.320(4)(c), F.A.C.]

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

8. No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor. An objectionable odor is defined as any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance. [Rules 62-296.320(2) F.A.C. and 62-210.200, F.A.C.]

9. **EU 005** - The allowable particulate emission rate is capped at 7.0 lbs./hr., as requested by the applicant. **The process rate is 112 tons per hour**. The total particulate emissions from both dryers (rotary dryer + fluidized bed dryer) are limited to 50.0 tons per any consecutive twelve months period as requested by the applicant. [Rule 62-210.200 (PTE), F.A.C.]

10. **EU 006** - The Rotary Dryer is subject to Rule 62-296.320(4)(a)(2), Process Weight Table 296.320-1, F.A.C. For process weight rates less than 30 tons per hour, P_1, and greater than 30 tons per hour, P_2, the respective allowable emission rates, E1 and E2 in pounds per hour are given below:

$E1 = 3.59\ (P_1^{\ 0.62})$ $E2 = 17.31\ (P_2^{\ 0.16})$

Based on the Process Weight Table, the allowable particulate emission rate is capped at 32.37 lbs./hr. for a **process rate of 50 tons per hour.** The total particulate emissions from **both dryers** (rotary dryer + fluidized bed dryer) are limited to 50.0 tons per any consecutive twelve month period as requested by the applicant. [Rule 62-210.200(PTE), F.A.C.] **The Rotary Dryer shall not operate without first obtained an air construction permit for a baghouse to control the emissions, and having the baghouse in operation. A new particulate limit will be established in the new construction permit to account for the addition of the baghouse.**

11. Visible emissions shall not exceed 5 percent opacity from the Fluidized Bed Dryer and the Rotary Dryer. [Rule 62-297.620, F.A.C.] **The Rotary Dryer shall not operate without first obtained an air construction permit for a baghouse to control the emissions, and having the baghouse in operation.**

WORK PRACTICE STANDARDS AND WORK PRACTICE MONITORING REQUIREMENTS

12. Operation and Maintenance Plan: The facility shall develop and implement an operation and maintenance (O&M) plan to minimize the PM emissions from the regulated emissions points and the facility wide fugitive PM emissions. The dates and actions of the following procedures shall be documented. These include:

    a) Daily inspections of all process equipment and the emissions control systems to identify any equipment leaks or malfunctions during the days when operating.
    b) Conduct repair/corrective action as soon as possible once the leaks or malfunctions are identified.
    c) Daily monitoring of the pressure drop for each control unit system during the days when operating. The control unit's pressure shall be operated in the range of the manufacturer's recommendation. The pressure drop shall be recorded on a daily basis on the days when operating.
    d) Daily inspection on the stack visible emissions from each dryer and baghouse during the day when operating. If an unusually high visible emission (compare to normal) is observed, the operator shall evaluate the process equipment and the control unit (if any) in order to conduct corrective action to bring the visible emissions back to normal.
    e) Watering, or an equivalent method, shall be implemented, to reduce fugitive PM emissions.

    Upon the Department's request, the facility shall revise the O&M plan to make the necessary changes to reduce PM emissions, including fugitive PM emissions. The revision of the O&M plan does not require permit revision. The plan (with the latest revision) shall be kept on site at all times, and made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

TESTING REQUIREMENTS

13. Annual Compliance Tests: The Fluid Bed Dryer and Rotary Dryer must be tested for visible emissions in accordance with DEP Method 9 [Rule 62-297.401, F.A.C.] during each federal fiscal year (Oct. 1 – Sept. 30).The DEP Method 9 test shall last one hour. [Rules 62-296.711, 62-297.310(7)(a)4. and 62-297.310(4)(a)2., F.A.C.]

14. Waiver of Compliance Test Requirements: The Fluidized Bed Dryer and the Rotary Dryer are subject to the Rule 62-296.320(4)(a)(2), Process Weight Table 296.320-1, F.A.C.; however, the requirement to conduct particulate testing for the Fluidized Bed Dryer and the Rotary Dryer **is waived** if compliance with the visible emission standard of 5 percent opacity is demonstrated (see Specific Condition Numbers 11 and 14 of this permitting section). **The Rotary Dryer has a potential to emit greater than 100 tons per year without a**

baghouse. The dryer shall not operate without first obtaining an air construction permit for a baghouse to control the emissions, and having the baghouse in operation.
[Rules 62-297.310(7)(c) and 62-297.620(4), F.A.C.]

15. Waiver of Compliance Test Requirements: In the case of an emissions unit which has the **potential to emit less than 100 tons per year** of particulate matter and is **equipped with a baghouse**, the Secretary or the appropriate Director of District Management **may waive any particulate matter compliance test requirements** for such emissions unit specified in any otherwise applicable rule, and **specify an alternative standard of 5% opacity. The waiver of compliance test requirements for a particulate emissions unit equipped with a baghouse, and the substitution of the visible emissions standard, shall be specified in the permit issued to the emissions unit.** If the Department has reason to believe that the particulate weight emission standard applicable to such an emissions unit is not being met, it shall require that compliance be demonstrated by the test method specified in the applicable rule.
[Rule 62-297.620(4), F.A.C.]

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

17. Special Compliance Tests: When the Department, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Department rule or in a permit issued pursuant to those rules is being violated, it 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 and to provide a report on the results of said tests to the Department. [Rule 62-297.310(7)(b), F.A.C]

18. Emission Factors: The potential to emit for PM, SO_2 and NO_X emissions shall be computed according to the following procedures and emission factors and previous compliance test factors:

a) For PM
- Fluidized Bed Dryer – the amount of time operated (hours) multiplied by 7.0 lbs./hr.
- Rotary Dryer – the amount of time operated (hours) multiplied by 4.3 lbs./hr.

b) For SO_2
- Fluidized Bed Dryer and Rotary Dryer

  Using Fuel Oil: AP 42 factor (157 lbs/mgal) multiplied by the **sulfur percent of the fuel oil being combusted** multiplied by SO_2 emission reduction factor (calculated using the removal efficiency based on previous testing (100% - 95%)) multiplied by the fuel oil usage multiplied by hours operated.

  Using Natural Gas: AP 42 factor (0.6 lbs/mmcf) multiplied by the natural gas usage multiplied by hours operated.

Using Propane: AP 42 factor (.10S lb/mgal) multiplied by the propane usage multiplied by hours operated. S equals the sulfur content of the propane expressed in gr/100 ft^3.

c) For NO_X

- Fluidized Bed Dryer and Rotary Dryer

Using Fuel Oil: AP 42 factor (55 lbs/mgallons) multiplied by the fuel oil usage multiplied by hours operated.

Using Natural Gas: AP 42 factor (100 lbs/mmcf) multiplied by the natural gas usage multiplied by hours operated.

Using Propane: AP 42 factor (13 lbs/mgallons) multiplied by propane usage multiplied by hours operated.

[Rule 62-4.070(3), F.A.C.]

19. Test Requirements: The permittee shall notify the Compliance Authority at least 15 days prior to any required tests. The permittee shall indicate the date, time, and place of such tests, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9., F.A.C.]

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

Method	Description of Method and Comments
DEP 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 Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

21. **The maximum operating rate for the fluid bed dryer is 112 tons per hour and for the rotary dryer is 50 tons per hour.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

22. A differential pressure gauge is required to measure the pressure drop across the baghouse, a minimum of 10 days before the stack test is performed.
[Rule 62-297.310(5), F.A.C.]

MONITORING REQUIREMENTS

23. The fuel sulfur content, percent by weight, for liquid fuels shall be evaluated using ASTM methods ASTM D4057-88 and one of ASTM D2622-94, ASTM D4294-98, ASTM D1552-95 or ASTM D129-91 or more

recent editions adopted and incorporated by reference in Rule 62-297.440(1), F.A.C. Alternately, after written notification to and approval by the Department, the permittee may use other DEP Air Program-approved methods, i.e. alternate sampling procedures, for sulfur in petroleum products.
[Rule 62-4.070, F.A.C.]

24. The permittee shall maintain records to demonstrate that the sulfur content, by weight, of each shipment of new and on-spec used oil and that the sulfur content was determined in accordance with the methods listed in Specific Condition Number 23 of this permitting section. [Rule 62-4.070, F.A.C.]

25. In order to demonstrate compliance with specific condition numbers 4, 9, 10, 21, and 24 of this permitting section; and general condition number 14.c. as specified in Appendix B (General Conditions) of this permit, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

    Monthly
    a) designation of the month and year of operation for which the records are being tabulated;
    b) consecutive 12-month total of the process rates (tons), the type and amount of fuels consumed, and potential to emit for particulate emissions, sulfur dioxide emissions, and nitrogen oxide emissions.
    c) fuel records relating to general condition number 14.c. in Appendix B (General Conditions). **This includes fuel records to demonstrate that the sulfur content, by weight, of each shipment of new and on-spec used oil as required by Specific Condition No. 24 of this permitting section.** [Rule 62-4.070(3), F.A.C.]

    Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month. **The monthly logs shall be completed by the end of the following month.**
    [Rule 62-4.070(3), F.A.C.]

26. Logs must document the method, calculations, and formulas used in determining the usage rate and the emission rate. This includes, but is not limited to, the product name, density, individual and total HAP contents, and individual and total VOC content. All calculations, including those used to derive emission credits for mass balance must be clearly documented, and may be presented **in the form of a template of sample calculations**, which is filed with the logs required in this specific condition and available for review on site by regulatory inspectors. [Rule 62-4.070(3), F.A.C.]

27. 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 information listed in Rules 62-297.310(8)(c)6., 12., 18., and 19., F.A.C. [Rule 62-297.310(8), F.A.C.]

28. Annual Operating Report: An Annual Operating Report is required to be completed and submitted for this facility as specified in Appendix C (Common Conditions) of this permit. This facility is classified as a synthetic non-Title V source. [Rule 62-210.370(3), F.A.C.]

This section of the permit addresses the following emissions units.

ID No.	Emissions Unit Description
001	**66" Raymond Mill** equipped with a Flex-Kleen, Model 100 WRBS-48 III baghouse with a particulate control efficiency of approximately 99%.
002	**Baghouse controlling No. 1 granular system** - The dry limestone crushing operation utilizing a Mikro-Pulsaire Model 196 TRH-8-20 baghouse having an air to cloth ratio of 4 to 1 to control particulate emissions from 19 locations. This emission unit is subject to 40 CFR 60.672, Subpart 000.
003	**Bagger System** - The dry limestone crushing operation utilizing a Mikro-Pulsaire Model 144 TRH-8-20 baghouse to control particulate emissions from 10 locations. **This emission unit is scheduled to be removed as requested in this construction permit modification and the emission unit will be deleted from the permit during the future operation permit modification process.**
004	**Baghouse controlling No. 2 granular system** - Particulate emissions from material transfer is controlled by **a** Flex Kleen baghouse. This emission unit is subject to 40 CFR 60.672, Subpart 000.
007	**Fine Grind Loadout Area D-1** - Particulate emissions are controlled by a Todd baghouse and two loadout dust collectors.
008	**73" Raymond Mill** equipped with a Model 100 WRBS-64 Arrangement III Flex Kleen baghouse with a particulate control efficiency of approximately 99%.
009	**Truck Blow-Off Bin** equipped with a free flow model PJ-P25-EB-10 baghouse having an air to cloth ratio of 4 to 1 to control particulate emissions.
011	**Granular Loadout Area D2** equipped with baghouse D-2, a MAC Equip. Model 96LST144, having an air to cloth ratio of 4.1 to 1 to control particulate emissions at the silo/truck and rail loading areas.
012	**Silo #5** equipped with a Flex-Kleen, Model 100 BUBS-25 baghouse.
013	**Baghouse controlling ball mill and feed silo,** a 50 ton separator, and a free flow bag house and a Griffin bag house, having an air to cloth ratio of 5 to 1 to control particulate emissions. This emission unit is subject to 40 CFR 60.672, Subpart 000.

EQUIPMENT

1. Equipment Name: The 66" Raymond Mill is equipped with a Flex-Kleen, Model 100 WRBS-48 III baghouse with a particulate control efficiency of approximately 99%. The Baghouse controlling No. 1 granular system utilizes a Mikro-Pulsaire Model 196 TRH-8-20 baghouse having an air to cloth ratio of 4 to 1 to control particulate emissions from 19 locations. **This bagger system, including the baghouse, is scheduled to be removed as requested in this construction permit modification and the emission unit will be deleted from the permit during the future operation permit modification process.** The Baghouse controlling No. 1 granular system - Particulate emissions from material transfer is controlled by **a Flex Kleen baghouse.** Fine Grind Loadout Area D-1 - Particulate emissions are controlled by a Todd baghouse and two loadout dust collectors. The 73" Raymond Mill is equipped with a Model 100 WRBS-64 Arrangement III Flex Kleen baghouse with a particulate control efficiency of approximately 99%. The Truck Blow-Off Bin is equipped with a free flow model PJ-P25-EB-10 baghouse having an air to cloth ratio of 4 to 1 to control particulate emissions. The Granular Loadout Area D2 is equipped with baghouse D-2, a MAC Equip. Model 96LST144, having an air to cloth ratio of 4.1 to 1 to control particulate emissions at the silo/truck and rail loading areas. Silo #5 is equipped with a Flex-Kleen, Model 100 BUBS-25 baghouse. Emission Unit 13 consists of a Conical Ball Mill, a 50 ton separator, and a free flow bag house and a Griffin bag house, having an air to cloth ratio of 5 to 1 to control particulate emissions. The Baghouse controlling ball mill and feed silo (EU ID No. 013), the Baghouse controlling No. 1 granular system (EU ID No. 002), and the Baghouse controlling No. 2 granular system (EU ID No. 004) are subject to 40 CFR 60 Subpart

OOO - Standards of Performance for Nonmetallic Mineral Processing Plants and with the general provisions of 40 CFR 60, Subpart A, where applicable, which are adopted by reference in Rule 62-204.800(8), F.A.C.

PERFORMANCE RESTRICTIONS

2. Restricted Operation: The hours of operation of are not limited (8760 hours per year).
[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS LIMITS AND STANDARDS

3. Emissions Limits: The Baghouse controlling No. 1 granular system, the Baghouse controlling No. 2 granular system, and the Baghouse controlling ball mill and feed silo are subject to the provisions of 40 CFR Part 60, Subpart A - General Provisions, the complete text of which is provided in Appendix E of this permit and 40 CFR Part 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants, the complete text of which is provided in Appendix F of this permit. Visible emissions limited to 7 percent opacity and fugitive emissions limited to 10 percent opacity pursuant to 40 CFR Part 60, Subpart OOO. [40 CFR Part 60, Subparts A and OOO]
[Permitting Note: Specific Condition No. 4 of this permitting section addresses visible emissions also.]

4. Emissions Limits: The visible emissions for the emission units listed in this permitted section must comply with Rule 62-296.711(2), F.A.C. (limited to less than 5 percent opacity).

5. Unconfined Emissions: The owner or operator shall comply with paragraph 62-296.320(4)(c), F.A.C., using the following reasonable precautions:

   a) Unconfined emissions that might be generated from various activities throughout a nonmetallic mineral processing plant processing dry material shall be controlled by using a water suppression system with spray bars located at the feeder(s), the entrance and exit of the crusher(s), the classifier screens, and the conveyor drop points.

   b) Unconfined emissions that might be generated by vehicular traffic or wind shall be controlled by applying water (by water trucks equipped with spray bars) or effective dust suppressant(s) on a regular basis to all stockpiles, roadways and work-yards where this nonmetallic mineral processing plant is located.
   [Rules 62-210.300 (4)(c)5.d.(i) and (ii), F.A.C.]

6. Reasonable Precautions of Unconfined Emissions of Particulate Matter: All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter (PM). These provisions are applicable to any source, including but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial-related activities such as loading, unloading, storing, and handling. Reasonable precautions to be taken shall include, but not be limited to the following:

   A. Paving and maintenance of roads, parking areas, and yards;
   B. Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing;
   C. Application of asphalt, water, oil, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities;

D. Removal of PM from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment, and from building(s) or work areas to prevent particulate from becoming airborne;
E. Landscaping or planting of vegetation;
F. Sprinkling with water shall be used as necessary on paved areas, unpaved areas, stockpiles, and during loading/unloading operations;
G. Prevent emissions from material handling by a loader shall be achieved by reducing the material freefall as the bucket dumps the aggregate. Drop heights shall be minimized from conveyors and screens; and
H. Water shall be applied to the crusher and transfer points, as necessary, to reduce unconfined PM. If operating experience indicates that these reasonable precautions are not sufficient to control unconfined PM emissions, the Department reserves the right to require additional measures. [Rules 62-4.070(3), 62-210.300(3)(c)2.e., and 62-296.320(4)(c), F.A.C.; Construction Permit

WORK PRACTICE STANDARDS AND WORK PRACTICE MONITORING REQUIREMENTS

7. Operation and Maintenance Plan: The facility shall develop and implement an operation and maintenance (O&M) plan to minimize the PM emissions from the regulated emissions points and the facility wide fugitive PM emissions. The dates and actions of the following procedures shall be documented. These include:

   a) Daily inspections of all process equipment and the emissions control systems to identify any equipment leaks or malfunctions during the days when operating.
   b) Conduct repair/corrective action as soon as possible once the leaks or malfunctions are identified.
   c) Daily monitoring of the pressure drop for each control unit system during the days when operating. The control unit's pressure shall be operated in the range of the manufacturer's recommendation. The pressure drop shall be recorded on a daily basis on the days when operating.
   d) Daily inspection on the stack visible emissions from each dryer and baghouse during the day when operating. If an unusually high visible emission (compare to normal) is observed, the operator shall evaluate the process equipment and the control unit (if any) in order to conduct corrective action to bring the visible emissions back to normal.
   e) Watering, or an equivalent method, shall be implemented, to reduce fugitive PM emissions.

   Upon the Department's request, the facility shall revise the O&M plan to make the necessary changes to reduce PM emissions, including fugitive PM emissions. The revision of the O&M plan does not require permit revision. The plan (with the latest revision) shall be kept on site at all times, and made available to the Department upon request. [Rule 62-4.070(3), F.A.C.]

TESTING REQUIREMENTS

8. Initial Compliance Tests: Emission **Units 002 and 011** must be tested for visible emissions in accordance with DEP Method 9 [Rule 62-297.401, F.A.C.] within 180 days after being placed in operation after construction/modifications have been completed. The DEP Method 9 test shall last thirty minutes or the length of the batch/cycle. [Rules 62-297.310(7)(a)4. and 62-297.310(4)(a)2., F.A.C.]

9. Annual Compliance Tests: The emission units must be tested for visible emissions in accordance with DEP Method 9 [Rule 62-297.401, F.A.C.] during each federal fiscal year (Oct. 1 – Sept. 30). The DEP Method

9 test shall last thirty minutes or the length of the batch/cycle. [Rule 62-297.310(7)(a)4. and 62-297.310(4)(a)2., F.A.C.]

10. Test Requirements: The permittee shall notify the Compliance Authority at least 15 days prior to any required tests. The permittee shall indicate the date, time, and place of such tests, and the test contact person who will be responsible for coordinating and having such test conducted for the owner or operator. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rule 62-297.310(7)(a)9., F.A.C.]

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

Method	Description of Method and Comments
DEP 9	Visual Determination of the Opacity of Emissions from Stationary Sources

The above method is described in Appendix A of 40 CFR 60 and adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the Department. [Rules 62-204.800 and 62-297.100, F.A.C.; and Appendix A of 40 CFR 60]

12. **The maximum operating rate for the Conical Ball Mill is 30 tons per hour.** Testing of emissions shall be conducted with the emissions unit operation at permitted capacity. Permitted capacity is defined as 90 to 100 percent of the maximum operation rate allowed by the permit. If it is impractical to test at permitted capacity, an emissions unit may be tested at less than the minimum permitted capacity; in this case, subsequent emissions unit operation is limited to 110 percent of the test load until a new test is conducted. Once the unit is so limited, operation at higher capacities is allowed for no more than 15 consecutive days for the purpose of additional compliance testing to regain the authority to operate at the permitted capacity. [Rule 62-297.310(2), F.A.C.]

MONITORING REQUIREMENTS

13. In order to demonstrate compliance with Specific Condition Number 12 of this permitting section, the permittee shall maintain a log at the facility for a period of at least 5 years from the date the data is recorded. The log shall contain the following:

    Monthly
    a) designation of the month and year of operation for which the records are being tabulated;
    b) consecutive 12-month total of the process rates (tons) and consecutive 12-month total of potential to emit for particulate emissions

    [Rule 62-4.070(3), F.A.C.]

    Note: A consecutive 12 months total is equal to the total for the month in question plus the totals for the eleven months previous to the month in question. A consecutive 12-months total treats each month of the year as the end of a 12-months period. A 12-months total is not a year-to-date total. Facilities that have not been operating for 12 months should retain 12 months totals using whatever number of months of data are available until such a time as a consecutive 12 months total can be maintained each month. **The monthly logs shall be completed by the end of the following month.**
    [Rule 62-4.070(3), F.A.C.]

14. Logs must document the method, calculations, and formulas used in determining the usage rate and the emission rate. This includes, but is not limited to, the product name, density, individual and total HAP

contents, and individual and total VOC content. All calculations, including those used to derive emission credits for mass balance must be clearly documented, and may be presented **in the form of a template of sample calculations**, which is filed with the logs required in this specific condition and available for review on site by regulatory inspectors. [Rule 62-4.070(3), F.A.C.]

15. 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 information listed in Rules 62-297.310(8)(c)6., 12., 18., and 19., F.A.C. [Rule 62-297.310(8), F.A.C.]

16. Annual Operating Report: An Annual Operating Report is required to be completed and submitted for this facility as specified in Appendix C (Common Conditions) of this permit. This facility is classified as a synthetic minor (non-Title V) source. [Rule 62-210.370(3), F.A.C.]