STATEMENT OF BASIS

Lafarge North America, Inc.
Palatka Plant
Facility ID No.: 1070039
Putnam County

Air Construction Permit
FINAL Permit Project No.: 1070039-010-AC

The Initial Title V Air Operation Permit, No. 1070039-003-AV, was issued/effective on May 22, 2002. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Permit revision No. 1070039-006-AV was designed to incorporate the following terms and conditions of air construction permit, No**.** 1070039-007-AC, for newly constructed Cage Mill Drying System #2 with Fabric Filter, and FGD Surge Bin #2 with Fabric Filter. However, the construction of EU022 FGD Surge Bin #2, EU023 Cage Mill Flashdryer System, and the connecting EU010 Belt Conveyors/Bucket Elevators did not start before the deadline specified in the compliance plan of the permit revision. The testing requirements for EU 003 and 018, Imp Mill Feed Silos A and B were amended in revision 1070039-006-AV as stated in the following terms.

> **EU022 FGD SURGE BIN #2:** FGD Surge Bin (55-ton Bin) with Fabric Filter.
> [40 CFR 60 SUBPART A; 40 CFR 60 Subpart OOO (Standards of Performance for New Stationary Sources – General Provisions and Standards of Performance for Nonmetallic Mineral processing Plants); and Rule 62-296.320(4)(a), (b), (c), F.A.C.]
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> **EU023 CAGE MILL FLASH DRYER SYSTEM # 2** with Fabric Filter**:** Maximum Production Rate: 110 tons/ hour, Maximum Heat Input Rate: 55 MMBtu/ hour.
> [40 CFR 60 SUBPART A; 40 CFR 60 Subpart UUU (Standards of Performance for Calciners and Dryers); and Rule 62-296.320(4)(a), (b), (c), F.A.C.]
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> **EU010 BELT CONVEYORS/BUCKET ELEVATORS:** Subject to NSPS- 40 CFR 60, Subpart OOO- Standards of Performance for Nonmetallic Mineral Processing Plants. Fugitive Emissions shall not exceed 10% Opacity.
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> **EUs 003 and 018:**Changes to testing requirements from EPA Methods 5 and 9 to EPA Method 22.
> EU003 & 018: Normal operation for each of these EPs is to vent into EU002, which requires a yearly EPA Method 5 and 9. Annual **EPA Method 22** is required for these units when they are operated such that emissions are vented apart from EU002 (inside of the building). During the process of constructing EU022 and 023, Lafarge will permanently seal off the vents of EP003 and EP018 such that they only vent to EU002. Upon sealing off these EPs, EPA Method 22 will no longer be required for EPs 003 and 018. **<u>Notification:</u> The permittee shall provide written notification to the Air Compliance Section of the Northeast District Office within 15 days of completion of the permanent sealing off EP003 and EP018 vents such that these emission points only vent to EU002.**
> [40 CFR 60.675(d)]

Permit No. 1070039-008-AV incorporated the terms and conditions of air construction permit, No. 1070039-009-AC, for the construction of Cage Mill Drying System #2 (EU022), FGD Surge Bin #2 (EU023), and associated conveyors and bucket elevators (EU010) that were not completed in the previous permit revision.

The subject of **this** construction permit is to install and operate gypsum-processing equipment to recycle reclaim wallboard as a raw material due to lack of waste gypsum from Seminole Electric or for economic reasons. Reclaim

Processing and Screening (EU024), will consist of a portable trommel screen that separates the paper from the wallboard using a screen and grinds the reclaim wallboard for use in the existing Norba Grinder and Hammermill System (EU009).

Project 010 also revises Air Construction Permit No. 1070039-009-AC since Lafarge has decided not to build a second surge bin filter (EP022), but to filter EU022 through the original surge bin filter system (EP001) instead. As a result, EP022 is removed from the permit, and the requirements from Specific Condition 4: PM10, VE and Fugitive Emissions Emission Limits, are no longer applicable since EU022 vents to EP001. Also, Note 1 from Specific Condition 7, which requires Method 22 Annual Visible Emissions Compliance Testing to be performed on EU022, will be conducted on EP001 instead of EP022.

According to the previous permit application received September 13, 2004, potential PM emissions from all emission units are 240.9 TPY. The additional PM generated by the Reclaim Processing and Screening equipment (EU024) is 1.11 TPY excluding fugitive emissions. The new facility total potential PM emissions, 242 TPY, are less than the 250 TPY threshold for PSD applicability.

CAM **does not** apply.

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

Based on the initial Title V Air Operation Permit application received November 9, 2001, this facility **is not** a major source of hazardous air pollutants (HAPs).