Florida Department of Environmental Protection

Northeast District
8800 Baymeadows Way West, Suite 100
Jacksonville, Florida 32256

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

Sent by Electronic Mail – Received Receipt Requested

Continental Palatka, LLC
886 North Highway 17
Palatka, Florida 32177

Re: Exemption from the Requirement to Obtain an Air Construction Permit
Continental Palatka, LLC, Continental Palatka, LLC Plant
Project No. 1070039-021-AC
Alternative wet additive trial (total of 120-day)

Dear Ms. Debbie Masters,

On December 18, 2015 the Department received Continental Palatka, LLC request to modify, and expand the 90-day alternative wet additive trial, granted in Air Permit No. 1070039-021-AC on August 19, 2015. The existing Continental Palatka Plant is located in Putnam County at 886 North, Highway 17, in Palatka, Florida. Based on the initial runs, Continental would like to increase the amount of siloxane allowed (from 250 gallons to 750 gallons) to be used in the trial period to facilitate internal PM and VOC emissions testing on the process. Continental is proposing to perform this stack testing in order to confirm the emission factors that were used in the trial period application. In addition to 500 more gallons of siloxane, Continental is requesting an additional 30 days to complete the trial period (120 days total). Following the completion of the internal emissions testing for PM and VOC, Continental plans to submit an air construction permit application for siloxane usage on a full-time basis at the Palatka facility. The Department is hereby issuing an Extension to the Trial Period, which authorizes the facility to conduct up to a 120-day trial to evaluate the use of a silicon based wet additive (siloxane) as an alternative to the wax on the wallboard product during the wallboard manufacturing process, to conduct PM and VOC emissions testing, and to submit an Air Construction permit application.

Determination: A complete review of this project is summarized in the attached Technical Evaluation. Pursuant to Rule 62-210.300(b) of the Florida Administrative Code (F.A.C.) and for the reasons stated in the Technical Evaluation, the Office of Permitting and Compliance determines that the activity will not emit air pollutants, "… in sufficient quantity, with respect to its character, quality or content, and the circumstances surrounding its location, use and operation, as to contribute significantly to the pollution problems within the State, so that the regulation thereof is not reasonably justified." Therefore, the project is exempt from the requirement to obtain an air construction permit. This determination may be revoked if the proposed activity is substantially modified or the basis for the exemption is determined to be materially incorrect. A copy of this letter shall be maintained at the site of the proposed activity. This permitting decision is made pursuant to Chapter 403, Florida Statutes.

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, F.A.C. The Permitting Authority responsible for making a permit determination for this project is The Northeast District Office.

EXEMPTION FROM AIR CONSTRUCTION PERMITTING

The Permitting Authority's physical address is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's mailing address is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Permitting Authority's telephone number is (904) 256-1700.

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 agency clerk in the Office of General Counsel of the Department of Environmental Protection, 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida 32399-3000. Petitions must be filed within 21 days of receipt of this exemption from air permitting requirements.

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 permitting action. 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.

Effective Date: This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., 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.

Richard S. Rachal III, P.G.
Program Administrator
Air Program

RSR/lm

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE
Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Construction permit and all copies were sent before the close of business on December 23, 2015 to the listed persons.

Clerk — December 23, 2015
Date

Debbie Master, Plant Manager, Continental Palatka, LLC (Debbie.master@lafarge-na.com)
Brad James, P.E. of Record, Trinity Consultants (bjames@trinityconsultants.com)
Adam Hansborough, Trinity Consultants (ahansborough@trinityconsultants.com)
Chris Kirts, The Department of Environmental Protection (christopher.kirts@dep.state.fl.us)

CONDITIONS OF EXEMPTION

Subject to the following provisions and restrictions, the Continental Palatka, LLC is authorized to conduct up to a 120-day trial to evaluate the use of a silicon based wet additive (siloxane) as an alternative to the wax on the wallboard product during the wallboard manufacturing process in accordance with the following information and conditions.

- Discussion of Initial Trial Period. The Palatka facility began the initial trial period on November 11, 2015 and as of December 18, 2015, has used approximately 29 gallons (242.8 lb) of siloxane. Based on these initial runs, Continental would like to increase the amount of siloxane allowed (from 250 gallons to 750 gallons) to be used in the trial period to facilitate internal PM and VOC emissions testing on the process. Continental is proposing to perform this stack testing in order to confirm the emission factors that were used in the trial period application.[1] In addition to 500 more gallons of siloxane, Continental is requesting an additional 30 days to complete the trial period (for a total of 120 days). Following the completion of the internal emissions testing for PM and VOC Continental plans to submit an air construction permit application for siloxane usage on a full-time basis at the Palatka facility.

- Discussion of emissions. VOC and PM will be emitted from (EU013) Wallboard Dryer during the drying process. This project will emit approximately 0.066 tons VOC emissions, and approximately 0.083 tons PM emissions during the trial period.

  Potential VOC emissions = Siloxane trial volume (gal) x Emission Factor (lb of VOC/ lb of additive used) x (Siloxane density lb/gal) x 1 ton/ 200 lb).
  = 750 (gal) x Emission Factor 0.021 (lb of VOC/ lb of additive used) x (Siloxane density 8.34 lb/gal) x 1 ton/ 200 lb) = 0.066 tons VOC emissions.
  Uncontrolled PM emissions = Siloxane trial volume (gal) x Emission Factor (lb of PM/PM_{10}/ lb of additive used) x (Siloxane density lb/gal) x 1 ton/ 200 lb).
  = 750 (gal) x Emission Factor 0.0265 (lb of PM/PM_{10}/ lb of additive used) x (Siloxane density 8.34 lb/gal) x 1 ton/ 200 lb) = 0.083 tons Uncontrolled PM emissions.

- Discussion of exemption. The permittee is authorized to conduct up to a 120-day trial to evaluate the use of a silicon based wet additive (siloxane) as an alternative to the wax on the wallboard product during the wallboard manufacturing process. In the event of operational problems, the facility is allowed to request in writing for an additional 30-days to complete the trial. The total of the trial shall not exceed 750 gallons of siloxane.

  • The trial period will be conducted on one (1) wallboard line.
  • Usage of up to but no more than one (3) totes of siloxane material (approximately 750 gallons).

- Internal VOC and PM emissions tests. Continental is proposing to perform this stack testing in order to confirm the emission factors that were used in the trial period application.[1]

- **Expiration and Revocation**- Authorization to use the alternative siloxane additive material expires at the end of 120 operating days of using the alternative siloxane additive material or when permitted amount of material has been used within that timeframe.

- The trial run shall be operated in accordance with the information submitted for this determination which was received by the Northeast District Office of the Department of Environmental Protection on August 3, 2015 and December 18, 2015. The applicant shall notify the Department's Air Compliance Authority by e-mail of any changes made to the trial run which are different from the information already submitted. The permittee shall submit to the Air Compliance Authority of this Office written notification of the date of commencement of the **extended and modified trial period**. These notifications shall be submitted to Mr. Christopher L. Kirts at Christopher.kirts@dep.state.fl.us, within as many days prior to the date of trial commencement as practical, but no later than fifteen (15) business day following commencement.

- **Trial Burn Summary Report.** The applicant shall notify the Department by e-mail (address above) within thirty (30) days of the date that the trial run is complete. A brief summary of the results (including but not limited to the dates of the trial run, and the actual VOC and PM emissions, and the results of the internal VOC and PM emissions tests) shall be submitted with this notification.

[1] The emission factors used in the initial application were based on a similar facility, a United States Gypsum Company facility, located in Oregon (Permit No. 05-0005-TV-01, pg. 12).