

ENVIRONMENTAL SERVICES

4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
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352/377-5822 ■ FAX/377-5822

via email only

Jeff Koerner, Administrator
Air Permitting and Compliance Program
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399
Jeff.koerner@dep.state.fl.us

RE: Argos Newberry Cement Plant, Facility ID: 0010087

Air Construction Permit Application Kilns ESP to Fabric Filter Conversion

Dear Jeff,

On behalf of Argos Cement LLC (Argos), I am submitting to you an application to request an air construction permit to authorize conversion of the electrostatic precipitators (ESP) to fabric filters that control emissions from the kiln systems of lines 1 and 2 (EU003 and EU010) at the subject facility. In follow up to this email, I will make sure that you receive the hardcopy seal and signature pages for the Department files.

In concert with the conversion of the ESPs to fabric filters for lines 1 and 2, Argos provides this courtesy notice of the following tentative new or replacement continuous monitors on both the kilns and clinker coolers.

EU003

Existing monitors to be removed SICK GM31 (NOx, SO₂, temperature) SICK GM35 (CO₂) SICK EuroFID (THC) SICK OMD41 (opacity) SICK FlowSIC FLSE106H (flow)

New/Replacement monitors

SICK MCS100E/HW (NO, NO₂, SO₂, CO, CO₂, O₂, H₂O)

SICK GMS811-FIDOR (THC)

SICK FlowSIC 100H (flow)

SICK Dusthunter T200 (opacity)

SICK Dusthunter SP100 (PM CPMS)

Temperature RTD

EU004

Existing monitor to be removed SICK OMD41 (opacity)

New/Replacement monitors
SICK Dusthunter T200 (opacity)
SICK Dusthunter SP100 (PM CPMS)

EU010

Existing monitor to be removed JUM 109A (THC)

New/Replacement monitors
SICK GMS811-FIDOR (THC)
SICK Dusthunter SP100 (PM CPMS)

EU011

New/Replacement monitors
SICK Dusthunter SP100 (PM CPMS)

The performance testing for these monitors will be in accordance with the applicable rules.

Please contact me if you have any questions on the application. Thank you for your time and I look forward to working with you and your staff on this application.

Sincerely,

Max Lee, Ph.D., P.E.

President, Koogler and Associates, Inc.

mlee@kooglerassociates.com

ec: William Voshell Jr., Argos Cement LLC, WVoshell@argos-us.com

Chris Horner, Argos Cement LLC, <u>CHorner@argos-us.com</u> Henry Gotsch, Argos Cement LLC, <u>OGotsch@argos-us.com</u> David Read, Florida DEP DARM, <u>david.read@dep.state.fl.us</u>

Richard Rachal, Florida DEP NE District, Richard.Rachal@dep.state.fl.us

Hastings Read, Florida DEP DARM, hastings.read@dep.state.fl.us



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1	Escilita Oversal/Common Norman Arrana Common II C				
1.	Facility Owner/Company Name: Argos Cement LLC				
2.	Site Name: Argos Newberry Cement Plant				
3.	Facility Identification Number: 0010087				
4.	Facility Location				
	Street Address or Other Locator: 4000 NW C	R 235			
	City: Newberry County: Ala	chua	Zip Code: 32669		
5.	Relocatable Facility?	5. Existing Title	V Permitted Facility?		
	☐ Yes ☐ No	Yes	□ No		
<u>Ap</u>	oplication Contact				
1.	Application Contact Name: Max Lee, Ph.D,	P.E.			
2.	Application Contact Mailing Address				
	Organization/Firm: Koogler and Associates,	Inc			
	Street Address: 4014 NW 13 th Street				
	City: Gainesville State	e: Florida	Zip Code: 32609		
3.	Application Contact Telephone Numbers				
	Telephone: (352) 377 - 5822 ext. 19 Fax: (352) 377 - 7158				
4.	Application Contact E-mail Address: mlee@kooglerassociates.com				
Ap	Application Processing Information (DEP Use)				
1.	. Date of Receipt of Application: 3. PSD Number (if applicable):				
2.	Project Number(s): 4. Siting Number (if applicable):				

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)
Air Construction Permit
Air construction permit.
☐ Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.
Air Operation Permit
☐ Initial Title V air operation permit.
☐ Title V air operation permit revision.
☐ Title V air operation permit renewal.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
☐ Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.
Air Construction Permit and Revised/Renewal Title V Air Operation Permit (Concurrent Processing)
☐ Air construction permit and Title V permit revision, incorporating the proposed project.
☐ Air construction permit and Title V permit renewal, incorporating the proposed project.
Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:
☐ I hereby request that the department waive the processing time
requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.
Application Comment
Application is for the removal of the ESPs currently installed on kilns 1 and 2 and for the installation of baghouses. The reason for this conversion is in anticipation of compliance to the upcoming NESHAP LLL PM limits for kilns.

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Processing Fee
003	Kiln System Line 1	NA	NA
010	In-line Kiln / Raw Mill Line 2	NA	NA

Application Processing Fee	
Check one: Attached - Amount: \$	Not Applicable

DEP Form No. 62-210.900(1) – Form

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name:

Chris Horner, Plant Manager

2. Owner/Authorized Representative Mailing Address...

Organization/Firm: Argos Cement LLC

Street Address: 4000 NW CR 235

City: Newberry

State: Florida

Zip Code: 32669

3. Owner/Authorized Representative Telephone Numbers...

Telephone: (352) 472 - 4722

ext. 130 Fa

(352) 472 - 2449

- 4. Owner/Authorized Representative E-mail Address:
- 5. Owner/Authorized Representative Statement:

I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.

Signature

12/1/14 Date

DEP Form No. 62-210.900(1) – Form Effective: 03/11/2010

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Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the "application responsible official" need not be the "primary responsible official."

1.	Application Responsible Official	al Name:	
2.	Application Responsible Of options, as applicable):	ficial Qualification (Cl	neck one or more of the following
	charge of a principal business decision-making functions for person if the representative is manufacturing, production, or Chapter 62-213, F.A.C.	function, or any other pe the corporation, or a dul- responsible for the overal operating facilities apply	vice-president of the corporation in rson who performs similar policy or y authorized representative of such Il operation of one or more ring for or subject to a permit under wer or the proprietor, respectively.
		ite, federal, or other publi	ic agency, either a principal executive
	The designated representative	at an Acid Rain source o	r CAIR source.
3.	Application Responsible Official Organization/Firm:	al Mailing Address	
	Street Address:		
	City:	State:	Zip Code:
4.	Application Responsible Official Telephone: () - ext.	al Telephone Numbers Fax: () -	
5.	Application Responsible Official	al E-mail Address:	

DEP Form No. 62-210.900(1) – Form Effective: 03/11/2010

Signature

6.	Application Responsible Official Certification:
	the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of
	Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance
	plan(s) submitted with this application.

Date

DEP Form No. 62-210.900(1) – Form

Professional Engineer Certification

1	D. C I. D.
1.	Professional Engineer Name: Max Lee, Ph.D. P.E.
	Registration Number: 58091
2.	Professional Engineer Mailing Address
	Organization/Firm: Koogler and Associates, Inc.
	Street Address: 4014 NW 13 th Street
	City: Gainesville State: Florida Zip Code: 32609
3.	Professional Engineer Telephone Numbers
	Telephone: (352) 377-5822 ext.19 Fax: (352) 377-7158
4.	Professional Engineer E-mail Address: mlee@kooglerassociates.com
5.	Professional Engineer Statement:
	I, the undersigned, hereby certify, except as particularly noted herein*, that:
	(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and
	(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application. (3) If the purpose of this application is to obtain a Title V air operation permit (check here, if so), I further certify that each emissions unit described in this application for air permit, when
	properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.
	(4) If the purpose of this application is to obtain an air construction permit (check here \square , if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here \square , if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.
	(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here if so), I further certify that, with the exception of any changes detailed as part of this application, eddinguch emissions unit has been constructed or modified in substantial accordance with the Mornday fiven in the corresponding application for air construction permit and with provisions with the corresponding application for air construction permit and with the corresponding application for air construction permit and with provisions with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction permit and with the corresponding application for air construction for air construction for air construction for air construction for air constr

DEP Portion 62-270, 900(1) - Form

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1.	Facility UTM Coordinates		2.	Facility Latitude/Lo	ongitude
	Zone 17 346.4 East (km) 3285.7 North (km)			Latitude (DD/MM/	SS) 29°57'45"
			Longitude (DD/MM/SS) 82°51'03"		
3.	Governmental	4. Facility Status	5.	Facility Major	6. Facility SIC(s):
	Facility Code: 0	Code: A		Group SIC Code:	3241
	-			32	
7.	Facility Comment:	None			

Facility Contact

1.	Facility Con	tact Name: Henry (Gotsch - Env	vironmental N	Ianager	
2.	Facility Con	tact Mailing Addres	SS			
	Organiza	ation/Firm: Argos (Cement LL(C		
Str	eet Address:	4000 NW CR 235				
		City: Newberry	Sta	te: Florida	Zip Code: 32669	
3.	Facility Con	tact Telephone Num	ibers:			
	Telephone:	352-472-4722	ext. 121	Fax: 352-	472-2449	
4.	Facility Con	tact E-mail Address	: OGotsch@	argos-us.com		

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

	· · · · ·					
1.	Facility Primary Responsible	Official N	ame:			
2.	Facility Primary Responsible	Official M	Iailing Ad	dress		
	Organization/Firm:					
	Street Address:					
	City:		State:		Zip Code:	
3.	Facility Primary Responsible	Official T	elephone l	Numbers		
	Telephone: () - ext.	Fa	ıx: () -			
4.	Facility Primary Responsible	Official E	-mail Add	ress:		

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a "major source" and a "synthetic minor source."

1. Small Business Stationary Source Unknown
2. Synthetic Non-Title V Source
3. Title V Source
4. Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)
5. Synthetic Minor Source of Air Pollutants, Other than HAPs
6. Major Source of Hazardous Air Pollutants (HAPs)
7. Synthetic Minor Source of HAPs
8. One or More Emissions Units Subject to NSPS (40 CFR Part 60)
9. One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)
10. One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)
11. Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))
12. Facility Regulatory Classifications Comment:

DEP Form No. 62-210.900(1) – Form

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap
		[Y or N]?
PM	A	N
PM_{10}	A	N
SO_2	В	N
NOx	A	N
CO	A	N
VOC	В	N
ТНС	В	N
H114	В	N

DEP Form No. 62-210.900(1) – Form

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant	2. Facility-	3. Emissions	4. Hourly	5. Annual	6. Basis for
Subject to	Wide Cap	Unit ID's	Cap	Cap	Emissions
Emissions	[Y or N]?	Under Cap	(lb/hr)	(ton/yr)	Cap
Cap	(all units)	(if not all units)			
N/A	N/A	N/A	N/A	N/A	N/A
7 Facility-Wi	 ide or Multi-Unit l	L Emissions Cap Con	l ment		
7. I defilty W	ide of white office	Emissions cap con	micht.		

DEP Form No. 62-210.900(1) – Form Effective: 03/11/2010

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date: TV renewal
2.	Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date: TV renewal
3.	Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date: TV renewal
	dditional Requirements for Air Construction Permit Applications
1.	Area Map Showing Facility Location: Attached, Document ID: Not Applicable (existing permitted facility)
2.	Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL):
	Attached, Document ID: in application
3.	Rule Applicability Analysis: Attached, Document ID: Not Applicable (existing permitted facility)
1	List of Exempt Emissions Units:
4.	☐ Attached, Document ID: Not Applicable
5.	<u></u>
	Attached, Document ID: Not Applicable
6.	Air Quality Analysis (Rule 62-212.400(7), F.A.C.):
	Attached, Document ID: Not Applicable
7.	Source Impact Analysis (Rule 62-212.400(5), F.A.C.):
	Attached, Document ID: Not Applicable
8.	Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.):
	Attached, Document ID: Not Applicable
9.	Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): Attached, Document ID: Not Applicable
10	<u> </u>
10	Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): Attached, Document ID: Not Applicable

DEP Form No. 62-210.900(1) – Form Effective: 03/11/2010

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1.	List of Exempt Emissions Units: Attached, Document ID: Not Applicable (no exempt units at facility)
Ac	Iditional Requirements for Title V Air Operation Permit Applications
	List of Insignificant Activities: (Required for initial/renewal applications only) Attached, Document ID: Not Applicable (revision application)
2.	Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought) Attached, Document ID: Not Applicable (revision application with no change in applicable requirements)
3.	Compliance Report and Plan: (Required for all initial/revision/renewal applications) Attached, Document ID: Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.
4.	List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only) Attached, Document ID: Equipment/Activities Onsite but Not Required to be Individually Listed Not Applicable
5.	Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only) Attached, Document ID: Not Applicable
6.	Requested Changes to Current Title V Air Operation Permit: Attached, Document ID: Not Applicable

DEP Form No. 62-210.900(1) – Form

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1.	Acid Rain Program Forms:
	Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):
	Attached, Document ID: Previously Submitted, Date:
	Not Applicable (not an Acid Rain source)
	Phase II NO _X Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):
	Attached, Document ID: Previously Submitted, Date:
	Not Applicable ■ Not Applicable Not Applicable
	New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):
	Attached, Document ID: Previously Submitted, Date:
	Not Applicable ■ Not Applicable Not Applicable
2.	CAIR Part (DEP Form No. 62-210.900(1)(b)):
	Attached, Document ID: Previously Submitted, Date:
	Not Applicable (not a CAIR source)
<u>A(</u>	dditional Requirements Comment

DEP Form No. 62-210.900(1) – Form

EMISSIONS UNIT INFORMATION

Section [1] of [2] EU 003 Kiln System – Line 1

III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application – Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

DEP Form No. 62-210.900(1) – Form

of [2]

EU 003 Kiln System – Line 1

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1.		gulated Emissions Unit? air operation permit. Skonly.)		
	emissions unit.			on Section is a regulated
	The emissions unregulated em	unit addressed in this Er nissions unit.	nissions Unit Informatio	on Section is an
<u>En</u>	nissions Unit Descr	iption and Status		
1.	Type of Emissions	Unit Addressed in this S	Section: (Check one)	
		Unit Information Section		
		or production unit, or ac which has at least one de		
	-		•	e emissions unit, a group
	of process or pr	roduction units and activ	vities which has at least	
	• `	vent) but may also produ	C	
	more process o	*	ctivities which produce	fugitive emissions only.
	Description of Emi	issions Unit Addressed i	n this Section: In-line	Kiln/Raw Mill System
3.	Emissions Unit Ide	entification Number: 00	3	
4.	Emissions Unit	5. Commence	6. Initial Startup	7. Emissions Unit
A	Status Code:	Construction Date:	Date: 12/17/99	Major Group SIC Code: 32
1 =		Dute.		510 0000.02
8.	Federal Program A	pplicability: (Check all	that apply)	
	Acid Rain Unit			
	CAIR Unit			
	Hg Budget Uni			
9.	Package Unit: Not Manufacturer:	Applicable	Model Number:	
10.		ate Rating: Not Applic		
	Emissions Unit Co	<u> </u>	unic 1/1 //	

DEP Form No. 62-210.900(1) – Form

Current Emissions Unit Control Equipment/Method: Control 1 of 3

1. Control Equipment/Method Description: **High-efficiency Electrostatic Precipitator (ESP)**

2. Control Device or Method Code: 010

Emissions Unit Control Equipment/Method: Control 2 of 3

 $1. \ \ Control\ Equipment/Method\ Description:$

SNCR

2. Control Device or Method Code: 107

Emissions Unit Control Equipment/Method: Control **3** of **3**

1. Control Equipment/Method Description:

Multi-Stage Combustion (MSC)

2. Control Device or Method Code: 025

Future ESP Replacement: Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:

To be installed: Fabric Filter - High Temperature (T > 250F). Emission point request to be named E19-01

2. Control Device or Method Code: **016**

DEP Form No. 62-210.900(1) – Form

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: See Comment

2. Maximum Production Rate: See Comment

3. Maximum Heat Input Rate: 364 million Btu/hr

4. Maximum Incineration Rate: Not Applicable pounds/hr

tons/day

5. Requested Maximum Operating Schedule:

24 hours/day

7 days/week 8,760 hours/year

52 weeks/year

6. Operating Capacity/Schedule Comment:

The preheater dry feed rate is the mass of material (on a dry basis) entering the preheater/kiln. The preheater dry feed rate is limited to 183.4 TPH on a 24-hr rolling average, 191.4 TPH (peak hourly rate), and 1,331,000 TPY.

The kiln clinker production rate shall not exceed 110.2 tons per hour (TPH) on a 24-hr rolling average, 115.0 TPH (peak hourly rate), and 2650 tons per day (TPD). On an annual basis, the clinker production rate shall not exceed 800,000 tons per year (TPY). The clinker production rate will be determined as a function of the preheater dry feed rate.

DEP Form No. 62-210.900(1) – Form

EMISSIONS UNIT INFORMATION

Section [1]

of [2]

EU 003 Kiln System – Line 1

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

n or 2. Emission Point 7	Type Code:
Comprising this Emissions Unit	for VE Tracking:
nission Units with this Emission	n Point in Common:
ack Height: 4.75 feet	7. Exit Diameter: 9.42 feet
tual Volumetric Flow Rate: 0,000 acfm*	10. Water Vapor: 17 %
te: 12. Nonstack Emissi Not Applicable	_
Latitude (DD/M)	Latitude/Longitude M/SS) 29/41/27 N MM/SS) 82/34/57 W
aghouse air to cloth ratio expe sed.	ected to be 3.28 ft/min or
litions. Raw Mill down flow ra	ate near 204,000 acfm.
1 (t	ck Height: 1.75 feet tual Volumetric Flow Rate: 0,000 acfm* e: 12. Nonstack Emissi Not Applicable 14. Emission Point I Latitude (DD/M Longitude (DD/M aghouse air to cloth ratio expessed.

DEP Form No. 62-210.900(1) – Form

of [2] EU 003 Kiln System – Line 1

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 10

1. Segment Description (Process/Fuel Type):

Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Preheater/Precalciner Kiln

2. Source Classification Code (SCC):

3. SCC Units:

3-05-006-23

Tons Processed

4. Maximum Hourly Rate: 191.4

5. Maximum Annual Rate: 1,331,000

6. Estimated Annual Activity Factor: **Not Applicable**

7. Maximum % Sulfur: **Not Applicable**

8. Maximum % Ash: **Not Applicable**

9. Million Btu per SCC Unit: **Not Applicable**

10. Segment Comment:

The max hourly rate is the peak hourly rate. The 24-hr rolling average maximum is 183.4 TPH. Represents the preheater dry feed rate.

Segment Description and Rate: Segment 2 of 10

1. Segment Description (Process/Fuel Type):

Industrial Processes; Mineral Products; Cement Manufacturing (Dry Process); Preheater/Precalciner Kiln

2. Source Classification Code (SCC): 3-05-006-23

3. SCC Units: **Tons Clinker**

4. Maximum Hourly Rate: 5. Maximum Annual Rate: 800,000 115.0

6. Estimated Annual Activity Factor: Not Applicable

7. Maximum % Sulfur: **Not Applicable**

8. Maximum % Ash: **Not Applicable**

9. Million Btu per SCC Unit: Not Applicable

10. Segment Comment:

The max hourly rate is the peak hourly rate. The 24-hr rolling average maximum is 110.2 TPH and the daily rate is 2,650 TPD. Represents the clinker production rate.

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EU 003 Kiln System – Line 1

D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment 3 of 10

1. Segment Description (Prod	cess/Fuel Type):			
Industrial Processes; In-proc	cess Fuel Use; B	ituminous Coal	; Ce	ement Kiln
2. Source Classification Code	e (SCC):	3. SCC Units:		
3-90-002-01		Tons Burned		
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6.	Estimated Annual Activity
14.0	122,640			Factor: Not Applicable
7. Maximum % Sulfur:	8. Maximum 9	% Ash:	9.	Million Btu per SCC Unit:
1.75	Not Applic	able	26	
10. Segment Comment:				
The maximum annual rate is	s based on the h	ourly rate and 8	3,76	0 hr/yr. Based on 364
MMBtu/hr maximum heat in	iput rate.			

Segment Description and Ra	ate: Segment 4 c	of <u>10</u>		
1. Segment Description (Pro	cess/Fuel Type):			
Industrial Processes; In-pro	cess Fuel Use; S	olid Waste (Tir	es);	General
2. Source Classification Cod	e (SCC):	3. SCC Units:	,	
3-90-012-99		Tons Burned		
4. Maximum Hourly Rate:	5. Maximum	Annual Rate:	6.	Estimated Annual Activity
4.2	36,792			Factor: Not Applicable
7. Maximum % Sulfur:	8. Maximum	% Ash:	9.	Million Btu per SCC Unit:
Not Applicable	Not Appli	cable		28
10. Segment Comment:	l		1	
	• •	al 100 times/lea	1	D41 1:4
The hourly rate is equivalen	it to approximat	eiv 400 ures/no	ur. I	Permit currently limits
The hourly rate is equivalentires to 30 percent of heat in		ely 400 tires/no	ur. 1	Permit currently limits
The hourly rate is equivalentires to 30 percent of heat in		ery 400 tires/no	ur. 1	Permit currently limits

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D. SEGMENT (PROCESS/FUEL) INFORMATION (CONTINUED)

Segment Description and Rate: Segment 5 of 10

1. Segment Description (Prod	cess/Fuel Type):		
Industrial Processes; In-Pro	cess Fuel Use: D	istillate Oil (Ui	aused): Cement Kiln/Drver
		(-	, , , , , , , , , , , , , , , , , , ,
2. Source Classification Code	e (SCC):	3. SCC Units:	
3-90-005-02	` ,	1.000 Gall	lons Burned
	C 36 :	· ·	
4. Maximum Hourly Rate:	5. Maximum	Annual Rate:	6. Estimated Annual Activity
Not Applicable	125		Factor: Not Applicable
7. Maximum % Sulfur:	8. Maximum	% Ash:	9. Million Btu per SCC Unit:
0.05	Not Applie	rahla	Not Applicable
0.05	Not Appli	cabic	Not Applicable
10. Segment Comment:			
The maximum annual rate is	s for kiln startu	p.	
	•		
~		2.10	

Segment Description and Ra	ite: Segment 6 o	of <u>10</u>	
1. Segment Description (Proc Industrial Processes; In-Proc	7 1 /	iquefied Petrolo	eum Gas (Propane); General
2. Source Classification Code	e (SCC):	3. SCC Units:	
3-90-010-89		1,000 Gallo	ons Burnea
4. Maximum Hourly Rate:	5. Maximum A	Annual Rate:	6. Estimated Annual Activity
Not Applicable	Not Applie	cable	Factor: Not Applicable
7. Maximum % Sulfur:	8. Maximum	% Ash:	9. Million Btu per SCC Unit:
Not Applicable	Not Applic	cable	Not Applicable
10. Segment Comment:			

Propane usage is limited to startup in lieu of tires in the first stage of the multistage combustor.

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EU 003 Kiln System – Line 1

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 7 of 10

1. Segment Description (Pro Industrial Processes; In-pro	• • •		
2. Source Classification Coc 3-90-008-89	de (SCC):	3. SCC Units Tons Bur	
4. Maximum Hourly Rate: Not Applicable	5. Maximum Not Appl		6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum Not Appli		9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment: The maximum petroleum cheat input.	oke rate will no	t exceed 91 MM	IBtu/hr nor 25% of total kiln
Segment Description and R	Rate: Segment 8	of 10	
Segment Description (Pro Industrial Processes; In	• • •		(Fly Ash); General
2. Source Classification Coo 3-90-012-89	de (SCC):	3. SCC Units Tons Bur	
4. Maximum Hourly Rate: Not Applicable	5. Maximum Not Applicab		6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum Not Applicab		9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment: The maximum flyash feed input.	rate will not exco	eed 19 MMBtu/	hr nor 5% of total kiln heat

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EU 003 Kiln System – Line 1

D. SEGMENT (PROCESS/FUEL) INFORMATION

Industrial Processes; In-process Fuel Use; Natural Gas; Cement Kiln/Dryer

Segment Description and Rate: Segment **9** of **10**

1. Segment Description (Process/Fuel Type):

2. Source Classification Cod 3-90-006-02	le (SCC):	3. SCC Units Million C	s: ubic Feet Burned
4. Maximum Hourly Rate: Not Applicable	5. Maximum Not Applicable		6. Estimated Annual Activity Factor: Not Applicable
7. Maximum % Sulfur: Not Applicable	8. Maximum Not Applicable		9. Million Btu per SCC Unit: Not Applicable
10. Segment Comment: The maximum natural gas f capacity of kiln.	eed rate will no	t exceed 364 M	MBtu/hr which is design
Segment Description and Ra	ate: Segment 10	of 10	
1. Segment Description (Pro	cess/Fuel Type):		
1. Segment Description (Pro Industrial Processes; In-Pro	ocess Fuel Use; A	AFM – Kiln and	
ı	ocess Fuel Use; A		s:
Industrial Processes; In-Pro 2. Source Classification Cod	ocess Fuel Use; A	3. SCC Units Tons Bur Annual Rate:	s:
 2. Source Classification Cod 3-90-012-89 4. Maximum Hourly Rate: 	le (SCC): 5. Maximum	3. SCC Units Tons Bur Annual Rate:	s: ned 6. Estimated Annual Activity

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EMISSIONS UNIT INFORMATION Section [1] of [2]

EU 003 Kiln System – Line 1

E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control	3. Secondary Control	4. Pollutant
	Device Code	Device Code	Regulatory Code
PM	Current (010)	Not Applicable	EL
	Future (016)		
PM ₁₀	Current (010)	Not Applicable	EL
	Future (016)		
Hg	Not Applicable	Not Applicable	EL
SO2	Not Applicable	Not Applicable	EL
NOx	107,025	Not Applicable	EL
СО	Not Applicable	Not Applicable	EL
VOC	Not Applicable	Not Applicable	EL
SAM	Not Applicable	Not Applicable	EL

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F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

Pollutant Emitted:	2 Total Para		
PM	2. Total Percent Efficiency of Control: 99+%		
			netically Limited?
3. Potential Emissions: 25.9 lb/hour 94	tons/year		es X No
			110
5. Range of Estimated Fugitive Emissions (as to tons/year	s applicable):		
6. Emission Factor:			7. Emissions
			Method Code:
Reference: 0010087-048-AV permit limit			0
8.a. Baseline Actual Emissions (if required):	8.b. Baseline	24-month	Period:
N/A tons/year	From:	7	Го:
9.a. Projected Actual Emissions (if required):	9.b. Projected	d Monitori	ng Period:
tons/year	5 yea	ars 1	0 years
10. Calculation of Emissions:	<u> </u>		
10. Calculation of Emissions: Current potential based on existing permit limitations. The upcoming CISWI compliance will reduce PM emissions to 4.6 mg/dscm.			
11. Potential, Fugitive, and Actual Emissions Comment: Note that only PM is addressed in this application for this EU because only PM will be affected by this baghouse which is replacing an ESP.			

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EMISSIONS UNIT INFORMATION Section [1] of [2] EU 003 Kiln System – Line 1

POLLUTANT DETAIL INFORMATION
Page [1] of [9]
Particulate Matter - PM

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

Basis for Allowable Emissions Code: BACT	2. Future Effective Date of Allowable Emissions:	
3. Allowable Emissions and Units:	4. Equivalent Allowable Emissions:	
25.9 lb/hr	25.9 lb/hour 94 tons/year	
5. Method of Compliance: Annual Method 5		
Aimuai victiou 3		
6. Allowable Emissions Comment (Description	of Operating Method):	

<u>Allowable Emissions</u> Allowable Emissions <u>2</u> of 2

Basis for Allowable Emissions Code: CISWI (future limitation)	2. Future Effective Date of Allowable Emissions: tbd
3. Allowable Emissions and Units: 4.6	4. Equivalent Allowable Emissions:
mg/dscm	2.6 lb/hour 11.4 tons/year
5. Method of Compliance:	

5. Method of Compliance: **Method 5 or 5i**

6. Allowable Emissions Comment (Description of Operating Method):

CISWI PM limit will reduce emissions.

4250 dscm (~153,000 dscfm) x 4.6 mg/dscm x lb/453,000 mg x 60 min/hr = 2.6 lb/hr 2.6 lb/hr x 8760 hr/yr /2000 = 11.4 ton/yr

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EMISSIONS UNIT INFORMATION Section [1] of [2] EU 003 Kiln System – Line 1 POLLUTANT DETAIL INFORMATION Page [2] of [9] Particulate Matter – PM₁₀

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM ₁₀	2. Total Percent Efficience 99+%	ency of Control:
3. Potential Emissions: 22.1 lb/hour 80	=	netically Limited? Yes 🕱 No
5. Range of Estimated Fugitive Emissions (as to tons/year	s applicable):	
6. Emission Factor:		7. Emissions Method Code:
Reference: 0010087-048-AV Permit limit		0
8.a. Baseline Actual Emissions (if required):	8.b. Baseline 24-month	Period:
tons/year	From:	Го:
9.a. Projected Actual Emissions (if required):	9.b. Projected Monitori	ng Period:
tons/year		0 years
10. Calculation of Emissions:		
10. Calculation of Emissions: Current potential based on existing permit limitations. The upcoming CISWI compliance will reduce PM emissions to 4.6 mg/dscm.		
11. Potential, Fugitive, and Actual Emissions Comment:		

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EMISSIONS UNIT INFORMATION Section [1] of [2] EU 003 Kiln System – Line 1

POLLUTANT DETAIL INFORMATION Page [2] of [9] Particulate Matter – PM₁₀

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

Allowable Emissions Allowable Emissions **1** of **1**

Basis for Allowable Emissions Code: BACT	2. Future Effective Date of Allowable Emissions:	
3. Allowable Emissions and Units: 22.1 lb/hr	4. Equivalent Allowable Emissions: 22.1 lb/hour 80 tons/year	
5. Method of Compliance: Annual Method 5 (assuming all PM measured is PM ₁₀).		
Annual Method 5 (assuming all PM measured	l is PM ₁₀).	

Allowable Emissions Allowable Emissions 2 of 2

Basis for Allowable Emissions Code: CISWI (future limitation)	2. Future Effective Date of Allowable Emissions: tbd
3. Allowable Emissions and Units: 4.6	4. Equivalent Allowable Emissions:
mg/dscm	2.6 lb/hour 11.4 tons/year
5 Made 1 of Counting	

5. Method of Compliance:

Method 5 or 5i

6. Allowable Emissions Comment (Description of Operating Method):

Estimate of equivalent allowable emissions.

4335 dscm (~153,000 dscfm) x 4.6 mg/dscm x lb/453,000 mg x 60 min/hr = 2.6 lb/hr 2.6 lb/hr x 8760 hr/yr x ton/2,000 lb = 11.4 ton/yr

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EMISSIONS UNIT INFORMATION Section [1] of [2]

EU 003 Kiln System – Line 1

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation <u>1</u> of <u>1</u>

1.	Visible Emissions Subtype: VE10	2. Basis for Allowable Opacity: Rule
3.	Allowable Opacity: Normal Conditions: 10% Ex Maximum Period of Excess Opacity Allower	ceptional Conditions:
4.	Method of Compliance: COMs	
5.	Visible Emissions Comment: Permit No. A	C01-267311/PSD-FL-228

EMISSIONS UNIT INFORMATION

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H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

<u>Continuous Monitoring System:</u> Continuous Monitor $\underline{\mathbf{1}}$ of $\underline{\mathbf{2}}$

	Parameter Code: VE	2. Pollutant(s): Not Applicable	
3.	CMS Requirement:	Rule Other	
4.	Monitor Information Manufacturer: SICK AG Environment	al Monitoring	
	Model Number: OMD41	Serial Number:	
5.	Installation Date: Prior to 2001	6. Performance Specification Test Date: Initial P.S. done on 1/22/01	
	7. Continuous Monitor Comment: COM is required per BACT determination permit. [Permit No. AC01-267311/PSD-FL-228].		
<u>Co</u>	ontinuous Monitoring System: Continuous	Monitor <u>2</u> of <u>2</u>	
	Parameter Code: PM - CPMS	Monitor <u>2</u> of <u>2</u> 2. Pollutant(s):	
	Parameter Code:	2. Pollutant(s):	
1.	Parameter Code: PM - CPMS	2. Pollutant(s): PM	
1. 3.	Parameter Code: PM - CPMS CMS Requirement: Monitor Information. Manufacturer: to be determined	2. Pollutant(s): PM Rule Other	

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I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1.	Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: NA Previously Submitted, Date TV renewal
2.	Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: NA Previously Submitted, Date TV renewal
3.	Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: provided in application Previously Submitted, Date
4.	Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID Previously Submitted, Date Not Applicable (construction application)
5.	Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date TV renewal Not Applicable
6.	Compliance Demonstration Reports/Records: Attached, Document ID: Test Date(s)/Pollutant(s) Tested: Previously Submitted, Date: Test Date(s)/Pollutant(s) Tested: To be Submitted, Date (if known): Test Date(s)/Pollutant(s) Tested: Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.
7.	Other Information Required by Rule or Statute: Attached, Document ID: Not Applicable

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EU 003 Kiln System – Line 1

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1	Control Technology Review and Analysis (Puloe 62 212 400(10) and 62 212 500(7)
1.		Rules 02-212.400(10) and 02-212.300(7),
	F.A.C.; 40 CFR 63.43(d) and (e)):	
	Attached, Document ID:	
2.	Good Engineering Practice Stack Height A	nalysis (Rules 62-212.400(4)(d) and 62-
	212.500(4)(f), F.A.C.):	•
	Attached, Document ID:	Not Applicable
3.		Required for proposed new stack sampling facilities
	only)	
	Attached, Document ID:	Not Applicable
<u>A</u> (lditional Requirements for Title V Air Op	eration Permit Applications
1.	Identification of Applicable Requirement	nts:
	Attached, Document ID:	
_		
2.	Compliance Assurance Monitoring:	
	Attached, Document ID:	Not Applicable
3.	Alternative Methods of Operation:	
	Attached, Document ID:	Not Applicable
4		
4.	Alternative Modes of Operation (Emiss	
	Attached, Document ID:	Not Applicable
Ac	lditional Requirements Comment	

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III. EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Application - For Title V air operation permitting only, emissions units are classified as regulated, unregulated, or insignificant. If this is an application for an initial, revised or renewal Title V air operation permit, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each regulated and unregulated emissions unit addressed in this application. Some of the subsections comprising the Emissions Unit Information Section of the form are optional for unregulated emissions units. Each such subsection is appropriately marked. Insignificant emissions units are required to be listed at Section II, Subsection C.

Air Construction Permit or FESOP Application - For air construction permitting or federally enforceable state air operation permitting, emissions units are classified as either subject to air permitting or exempt from air permitting. The concept of an "unregulated emissions unit" does not apply. If this is an application for an air construction permit or FESOP, a separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit subject to air permitting addressed in this application for air permit. Emissions units exempt from air permitting are required to be listed at Section II, Subsection C.

Air Construction Permit and Revised/Renewal Title V Air Operation Permit Application - Where this application is used to apply for both an air construction permit and a revised or renewal Title V air operation permit, each emissions unit is classified as either subject to air permitting or exempt from air permitting for air construction permitting purposes, and as regulated, unregulated, or insignificant for Title V air operation permitting purposes. A separate Emissions Unit Information Section (including subsections A through I as required) must be completed for each emissions unit addressed in this application that is subject to air construction permitting and for each such emissions unit that is a regulated or unregulated unit for purposes of Title V permitting. (An emissions unit may be exempt from air construction permitting but still be classified as an unregulated unit for Title V purposes.) Emissions units classified as insignificant for Title V purposes are required to be listed at Section II, Subsection C.

If submitting the application form in hard copy, the number of this Emissions Unit Information Section and the total number of Emissions Unit Information Sections submitted as part of this application must be indicated in the space provided at the top of each page.

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EU 010 Kiln/Raw Mill – Line 2

A. GENERAL EMISSIONS UNIT INFORMATION

Title V Air Operation Permit Emissions Unit Classification

1.	or renewal Title V air operation permit. Skip this item if applying for an air construction permit or FESOP only.)				
	 ☑ The emissions unit addressed in this Emissions Unit Information Section is a regulated emissions unit. ☑ The emissions unit addressed in this Emissions Unit Information Section is an 				
	unregulated en	nissions unit.			
	nissions Unit Descr				
1.		Unit Addressed in this			
	single process	s Unit Information Section or production unit, or act which has at least one do	tivity, which produces of	one or more air	
	of process or p	s Unit Information Section roduction units and active vent) but may also prod	vities which has at least	e emissions unit, a group one definable emission	
		s Unit Information Section production units and a		e emissions unit, one or fugitive emissions only.	
2.	Description of Em	issions Unit Addressed i	n this Section: Kiln/Ra	nw Mill – Line 2	
3.	Emissions Unit Ide	entification Number: 01	0		
4.	Emissions Unit	5. Commence	6. Initial Startup	7. Emissions Unit	
	Status Code A	Construction	Date:	Major Group	
		Date: July 25 , 2005	March 10, 2010	SIC Code: 32	
8.	Federal Program A	Applicability: (Check all	that apply) Not Applic	able	
	Acid Rain Unit	t			
	CAIR Unit				
	☐ Hg Budget Uni	it			
9.	Package Unit: Not	Applicable			
	Manufacturer: Model Number:				
		ate Rating: Not Applica	ble MW		
11.	. Emissions Unit Co	omment:			

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EMISSIONS UNIT INFORMATION

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EU 010 Kiln/Raw Mill - Line 2

Current Emissions Unit Control Equipment/Method: Control 1 of 3

1. Control Equipment/Method Description:

High-Efficiency Electrostatic Precipitator (ESP)

2. Control Device or Method Code: 010

Current Emissions Unit Control Equipment/Method: Control 2 of 3

1. Control Equipment/Method Description:

Selective Non-Catalytic Reduction (SNCR)

2. Control Device or Method Code: 107

<u>Current Emissions Unit Control Equipment/Method:</u> Control <u>3</u> of <u>3</u>

1. Control Equipment/Method Description:

Multi-Stage Combustion (MSC)

2. Control Device or Method Code: 025

Future ESP Replacement: Emissions Unit Control Equipment/Method: Control 1 of 1

1. Control Equipment/Method Description:

To be installed: Fabric Filter - High Temperature (T > 250F).

Emission point request to be named 2E19-01

2. Control Device or Method Code: 016

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EU 010 Kiln/Raw Mill – Line 2

B. EMISSIONS UNIT CAPACITY INFORMATION

(Optional for unregulated emissions units.)

Emissions Unit Operating Capacity and Schedule

1. Maximum Process or Throughput Rate: See Comment

2. Maximum Production Rate: See Comment

3. Maximum Heat Input Rate: 400 million Btu/hr

4. Maximum Incineration Rate: Not Applicable pounds/hr

tons/day

5. Requested Maximum Operating Schedule:

24 hours/day

7 days/week

52 weeks/year

8670 hours/year

6. Operating Capacity/Schedule Comment:

The kiln shall not process more than 212 tons of dry preheater feed and dry flyash per hour (24-hour average) and shall not produce more than 125 tons of clinker per hour (24-hour average). The facility shall not produce more than 156 tons of Portland cement, masonry cement and other specialty products per hour (30 day average). Process and production rates shall be further limited to 1,857,120 tons of dry preheater feed and dry flyash in any consecutive 12-month period, 1,095,000 tons of clinker in any consecutive 12-month period, and 1,366,560 tons of Portland cement in any consecutive 12-month period.

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EU 010 Kiln/Raw Mill – Line 2

C. EMISSION POINT (STACK/VENT) INFORMATION

(Optional for unregulated emissions units.)

Emission Point Description and Type

1. Identification of Point on Plot Plan or Flow Diagram: 2E21, Kiln		2. Emission Point 7	•		
3. Descriptions of Emission Points Comprising this Emissions Unit for VE Tracking: Not Applicable					
4. ID Numbers or Description					
5. Discharge Type Code: V	6. Stack Height 314.75 feet	:	7. Exit Diameter: 9.42 feet		
8. Exit Temperature: 221°F		metric Flow Rate: 10. Water Vapor:			
11. Maximum Dry Standard F 173,000 dscfm	low Rate:	12. Nonstack Emissi Not Applicable	_		
13. Emission Point UTM Coordinates Zone: 17R East (km): 346811 North (km): 3285610		14. Emission Point Latitude/Longitude 29/41/27.8 N Latitude (DD/MM/SS) 82/34/58.3 W Longitude (DD/MM/SS)			
15. Emission Point Comment: New baghouse air to cloth ratio expected 3.28 ft/min or less. Membrane filter bags will be used. Location by Google Earth *Represents Raw Mill up conditions. Raw Mill down flow rate near 231,000 acfm.					

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EU 010 Kiln/Raw Mill - Line 2

D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 1 of 9

1. Segment Description (Prod	. Segment Description (Process/Fuel Type):					
Mineral Products: Cement Manufacturing: Dry Process: Preheater/Precalciner Kiln						
2 Source Classification Code	· (\$CC):	2 SCC Unite	Tons Clinker			
2. Source Classification Code 3-05-006-23	e (SCC):	3. SCC Units:	Tons Chiker			
4. Maximum Hourly Rate: 125	5. Maximum A	Annual Rate: 5,000	6. Estimated Annual Activity Factor: Not Applicable			
7. Maximum % Sulfur: Not Applicable	8. Maximum 9 Not Applie		9. Million Btu per SCC Unit: Not Applicable			
10. Segment Comment: None						

Segment Description and Rate: Segment 2 of 9

		 '. _			
1. Segment Description (Pro	1. Segment Description (Process/Fuel Type):				
In-Process Fuel Use: Coal:	Cement Kiln				
2. Source Classification Cod 3-90-002-01	le (SCC):	3. SCC Units	s: Tons Burned		
4. Maximum Hourly Rate: 15.4	5. Maximum 134	Annual Rate: , 769	6. Estimated Annual Activity Factor: Not Applicable		
7. Maximum % Sulfur: No limit requested	8. Maximum No limit re		9. Million Btu per SCC Unit: 26		
10. Segment Comment: Coal heat value: 13,000 Btu 400 MMBtu/hr ÷ 26 MMB					

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@8760 hr/year = 134,769 tons/year

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D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 3 of 9

1. Segment Description (Process/Fuel Type):						
In-Process Fuel Use: Natural Gas : Cement Kiln						
2. Source Classification Code 3-90-006-02						
4. Maximum Hourly Rate: 0.381	5. Maximum 333	Annual Rate: 37.1	6. Estimated Annual Activity Factor: Not Applicable			
7. Maximum % Sulfur: Not Applicable	8. Maximum Not Appli		9. Million Btu per SCC Unit: 1050			
10. Segment Comment: No permit limit on fuel usage. Estimated maximums. Natural gas heat value: 1050 Btu/cf = 1050 MMBtu/MMCF 400 MMBtu/hr ÷ 1050 MMBtu/MMCF = 0.381 MMCF/hr @8760 hr/year = 3337.1 MMCF/year						

Segment Description and Rate: Segment 4 of 9

		-			
1. Segment Description (Proc	1. Segment Description (Process/Fuel Type):				
In-Process Fuel Use: Distillate Oil : Cement Kiln					
2. Source Classification Code (SCC): 3. SCC Units: Thousand Gallons Burned 3-90-005-02					
4. Maximum Hourly Rate: 2.857	5. Maximum 25,	Annual Rate: 028	6. Estimated Annual Activity Factor: Not Applicable		
7. Maximum % Sulfur: 1.0	8. Maximum % Ash: Not Applicable		9. Million Btu per SCC Unit: 140		
10. Segment Comment: This segment is for No. 2 or No. 4 oil No permit limit on fuel usage. Estimated maximums. Distillate oil heat value: 140,000 Btu/gal = 140 MMBtu/10 ³ gal 400 MMBtu/hr ÷ 140 MMBtu/10 ³ gal = 2.857 (10 ³ gal)/hr = 2857 gallons/hour @8760 hr/year = 25028 (10 ³ gal)/year					

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D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 5 of 9

1. Segment Description (Pr	1. Segment Description (Process/Fuel Type):					
In-Process Fuel Use: Prop	ane : Cement Kil	n				
2. Source Classification Co 3-90-010-99	ode (SCC):	3. SCC Units:	Thousand Gallons Burned			
4. Maximum Hourly Rate: 4.255	5. Maximum 37 ,	Annual Rate: ,277	6. Estimated Annual Activity Factor: Not Applicable			
7. Maximum % Sulfur: Not Applicable	8. Maximum Not Appli		9. Million Btu per SCC Unit: 94			
10. Segment Comment: Propane heat value: 94,000 Btu/gal = 94 MMBtu/10 ³ gal 400 MMBtu/hr ÷ 94 MMBtu/10 ³ gal = 4.255 (10 ³ gal)/hr = 4255 gallons/hour For startup only						

Segment Description and Rate: Segment 6 of 9

Segment Segment w or 2						
1. Segment Description (Pro	1. Segment Description (Process/Fuel Type):					
In-Process Fuel Use: Coke: Cement Kiln						
2. Source Classification Code (SCC): 3-90-008-99 3. SCC Units: Tons Burned						
4. Maximum Hourly Rate: 15.04	5. Maximum Annual Rate: 131,729	6. Estimated Annual Activity Factor: Not Applicable				
7. Maximum % Sulfur: No limit requested	8. Maximum % Ash: No limit requested	9. Million Btu per SCC Unit: 26.6				
10. Segment Comment:						
No permit limit on fuel usage. Estimated maximums.						
Coke heat value: 13,300 Btu						
400 MMBtu/hr ÷ 26.6 MM	Btu/ton = 15.04 tons/hr					
@8760 hr/year = 131,729 tons/year						

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D. SEGMENT (PROCESS/FUEL) INFORMATION

Segment Description and Rate: Segment 7 of 9

1. Segment Description (Process/Fuel Type):					
In-Process Fuel Use: Tires Supplemental Fuel at up to 30% of heat value (120 MMBtu/hour)					
2. Source Classification Code 3-90-012-99	e (SCC):	3. SCC Units	:: Tons Burned		
4. Maximum Hourly Rate: 5	5. Maximum 53,	Annual Rate: 800	6. Estimated Annual Activity Factor: Not Applicable		
7. Maximum % Sulfur: No limit requested	8. Maximum % Ash: No limit requested		9. Million Btu per SCC Unit: 24		
10. Segment Comment: Tire fuel limited to 30% of heat input, 120 mmbtu/hr Tires heat value: 12,000 Btu/lb = 24 MMBtu/ton 120 MMBtu/hr ÷ 24 MMBtu/ton = 5 tons/hr @8760 hr/year = 53800 tons/year					

Segment Description and Rate: Segment 8 of 9

Segment Description and Kate: Segment o of 9						
1. Segment Description (Pro	cess/Fuel Type):					
In-Process Fuel Use: High carbon fly ash						
2. Source Classification Code (SCC): 3. SCC Units: Tons Burned 3. SCC Units: Tons Burned						
4. Maximum Hourly Rate: 20	5. Maximum	Annual Rate: ,200	6. Estimated Annual Activity Factor: Not Applicable			
7. Maximum % Sulfur: No limit requested	8. Maximum % Ash: No limit requested		9. Million Btu per SCC Unit: 1			
10. Segment Comment: Estimated maximums based on 5% of heat input. 20 mmbtu/hr and 1 mmbtu/ton.						

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Segment Description and Rate: Segment $\underline{9}$ of $\underline{9}$

1. Segment Description (Process/Fuel Type):					
Industrial Processes; In-Pro	Industrial Processes; In-Process Fuel Use; AFM – Kiln and Precalciner				
2. Source Classification Code	e (SCC):	3. SCC Units:			
3-90-012-89		Tons Burned			
4. Maximum Hourly Rate:	5. Maximum	Annual Rate:	6. Estimated Annual Activity		
See Appendix 1	See Apper	ndix 1	Factor:		
7. Maximum % Sulfur:	8. Maximum	% Ash:	9. Million Btu per SCC Unit:		
See Appendix 1			See Appendix 1		
10. Segment Comment:					
Segment represents non-hazardous fuels					

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E. EMISSIONS UNIT POLLUTANTS

List of Pollutants Emitted by Emissions Unit

1. Pollutant Emitted	2. Primary Control	3. Secondary Control	4. Pollutant
	Device Code	Device Code	Regulatory Code
PM	Current (010)	Not Applicable	EL
	Future (016)		
PM ₁₀	Current (010)	Not Applicable	EL
	Future (016)		
Hg	Not Applicable	Not Applicable	EL
SO2	Not Applicable	Not Applicable	EL
NOx	107, 025	Not Applicable	EL
СО	Not Applicable	Not Applicable	EL
VOC	Not Applicable	Not Applicable	EL

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POLLUTANT DETAIL INFORMATION EU 010 Kiln/Raw Mill – Line 2

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM	2. Total Percent Efficiency of Control:		
3. Potential Emissions: 28.8 lb/hour 126.1	l tons/year	4. Synthetically Limited Yes X No	?
5. Range of Estimated Fugitive Emissions (as to tons/year	s applicable):		
6. Emission Factor: Reference: 0010087-048-AV permit limit		7. Emissions Method Coo	de:
	9 h Dogalina	24-month Period:	
8.a. Baseline Actual Emissions (if required): tons/year	From:	To:	
9.a. Projected Actual Emissions (if required):	9.b. Projected Monitoring Period:		
tons/year 5 years 10 years 10. Calculation of Emissions: Current potential based on existing permit limitations. The upcoming CISWI compliance will reduce PM emissions to 4.6 mg/dscm. Note that only PM is addressed in this application for this EU because only PM will be affected by this baghouse which is replacing an ESP			

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POLLUTANT DETAIL INFORMATION EU 010 Kiln/Raw Mill – Line 2

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

<u>Allowable Emissions</u> Allowable Emissions <u>1</u> of <u>2</u>

1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of	Allowable
	BACT		Emissions:	
3.	Allowable Emissions and Units:	4.	Equivalent Allowable En	missions:
	28.8 lb/hr		28.8 lb/hour	126.1 tons/year
5.	Method of Compliance:			
	Annual Method 5			
6.	Allowable Emissions Comment (Description	of (Operating Method):	

Allowable Emissions Allowable Emissions 2 of 2

Basis for Allowable Emissions Code: CISWI (future limitation)	2. Future Effective Date of Allowable Emissions: tbd
3. Allowable Emissions and Units: 4.6 mg/dscm	4. Equivalent Allowable Emissions: 3.0 lb/hour 13.1 tons/year

5. Method of Compliance:

Method 5 or 5i and PM CPMS

6. Allowable Emissions Comment (Description of Operating Method):

CISWI PM limit will reduce emissions.

4,900 dscm (\sim 173,000 dscfm) x 4.6 mg/dscm x lb/453,000 mg x 60 min/hr = 3.0 lb/hr

 $3.0 \text{ lb/hr} \times 8760 \text{ hr/yr} \times \text{ton/2,000 lb} = 13.1 \text{ ton/yr}$

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POLLUTANT DETAIL INFORMATION EU 010 Kiln/Raw Mill – Line 2

F1. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION – POTENTIAL, FUGITIVE, AND ACTUAL EMISSIONS

(Optional for unregulated emissions units.)

Complete a Subsection F1 for each pollutant identified in Subsection E if applying for an air construction permit or concurrent processing of an air construction permit and a revised or renewal Title V operation permit. Complete for each emissions-limited pollutant identified in Subsection E if applying for an air operation permit.

Potential, Estimated Fugitive, and Baseline & Projected Actual Emissions

1. Pollutant Emitted: PM10	2. Total Perc	ent Efficie	ency of Control:
3. Potential Emissions: 25 lb/hour 109.5	5 tons/year	_	etically Limited?
5. Range of Estimated Fugitive Emissions (as to tons/year	s applicable):		
6. Emission Factor: Reference: 0010087-041-AV Permit limit			7. Emissions Method Code: 0
8.a. Baseline Actual Emissions (if required):	8.b. Baseline	24-month	
tons/year	From:		o:
9.a. Projected Actual Emissions (if required):	9.b. Projected	d Monitori	ng Period:
tons/year	☐ 5 years ☐ 10 years		
10. Calculation of Emissions: Current potential based on existing permit licompliance will reduce PM emissions to 4.6 reduces a compliance with the compliance will reduce PM emissions to 4.6 reduces a compliance with the comp		e upcomin	ng CISWI

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POLLUTANT DETAIL INFORMATION EU 010 Kiln/Raw Mill – Line 2

F2. EMISSIONS UNIT POLLUTANT DETAIL INFORMATION - ALLOWABLE EMISSIONS

Complete Subsection F2 if the pollutant identified in Subsection F1 is or would be subject to a numerical emissions limitation.

<u>Allowable Emissions</u> Allowable Emissions <u>1</u> of <u>2</u>

1.	Basis for Allowable Emissions Code:	2.	Future Effective Date of	f Allowable
	BACT		Emissions:	
3.	Allowable Emissions and Units:	4. Equivalent Allowable Emissions:		
			25.0 lb/hour	109.5 tons/year
5.	5. Method of Compliance:			
Annual EPA Method 5 (assuming all PM measured is PM_{10}).				
6.	6. Allowable Emissions Comment (Description of Operating Method):			

<u>Allowable Emissions</u> Allowable Emissions <u>2</u> of 2

Basis for Allowable Emissions Code: CISWI (future limitation)	2. Future Effective Date of Allowable Emissions: tbd
3. Allowable Emissions and Units: 4.6 mg/dscm	4. Equivalent Allowable Emissions: 3.0 lb/hour 13.1 tons/year

5. Method of Compliance:

Method 5 or 5i and PM CPMS

6. Allowable Emissions Comment (Description of Operating Method):

CISWI PM limit will reduce emissions.

4900 dscm (~173,000 dscfm (engineering knowledge for new baghouse system)) x 4.6 mg/dscm x lb/453,000 mg x 60 min/hr = 3.0 lb/hr

 $3.0 \text{ lb/hr} \times 8760 \text{ hr/yr} / 2000 = 13.1 \text{ ton/yr}$

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EMISSIONS UNIT INFORMATION

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EU 010 Kiln/Raw Mill - Line 2

G. VISIBLE EMISSIONS INFORMATION

Complete Subsection G if this emissions unit is or would be subject to a unit-specific visible emissions limitation.

<u>Visible Emissions Limitation:</u> Visible Emissions Limitation $\underline{\mathbf{1}}$ of $\underline{\mathbf{1}}$

[2]

1.	Visible Emissions Subtype: VE10	2. F	Basis for Allowal	ole Opacity:
			X Rule	Other
3.	Allowable Opacity:			
	Normal Conditions: 10% Ex	ceptio	onal Conditions:	
	Maximum Period of Excess Opacity Allowe	ed:		min/hour
4.	Method of Compliance: COMs			
5.	Visible Emissions Comment:			
Per	rmit No. AC01-267311/PSD-FL-228			

H. CONTINUOUS MONITOR INFORMATION

Complete Subsection H if this emissions unit is or would be subject to continuous monitoring.

<u>Continuous Monitoring System:</u> Continuous Monitor <u>1</u> of <u>2</u>

1.	Parameter Code: VE	2. Pollutant(s): Not Applicable
3.	CMS Requirement:	Rule Other
4.	Monitor Information Manufacturer: SICK AG Environmenta Model Number: OMD41	al Monitoring Serial Number:
5.	Installation Date:	6. Performance Specification Test Date:
<u>Co</u>	ontinuous Monitoring System: Continuous	Monitor <u>2</u> of <u>2</u>
1.	Parameter Code: PM - CPMS	2. Pollutant(s): PM
3.	CMS Requirement:	Rule Other
4.	Monitor Information. Manufacturer: to be determined Model Number:	Serial Number:
5.	Installation Date: future	6. Performance Specification Test Date: future
7.	Continuous Monitor Comment: Parametric	c monitoring of PM to comply to CISWI

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EU 010 Kiln/Raw Mill – Line 2

I. EMISSIONS UNIT ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

Process Flow Diagram: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: NA Previously Submitted, Date TV renewal
Fuel Analysis or Specification: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: NA Previously Submitted, Date TV renewal
Detailed Description of Control Equipment: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: provided in application Previously Submitted, Date
Procedures for Startup and Shutdown: (Required for all operation permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date Not Applicable
Operation and Maintenance Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) Attached, Document ID: Previously Submitted, Date TV renewal Not Applicable
Compliance Demonstration Reports/Records: Attached, Document ID: Test Date(s)/Pollutant(s) Tested: Previously Submitted, Date: Test Date(s)/Pollutant(s) Tested: To be Submitted, Date (if known): Test Date(s)/Pollutant(s) Tested: X Not Applicable Note: For FESOP applications, all required compliance demonstration records/reports must be submitted at the time of application. For Title V air operation permit applications, all required compliance demonstration reports/records must be submitted at the time of application, or a compliance plan must be submitted at the time of application.

7.	Other Information Required by Rule or Stat	rute:
	Attached, Document ID:	Not Applicable

EMISSIONS UNIT INFORMATION

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EU 010 Kiln/Raw Mill – Line 2

I. EMISSIONS UNIT ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Air Construction Permit Applications

1. Control Technology Review and Analysis (Ru	les 62-212.400(10) and 62-212.500(7),
F.A.C.; 40 CFR 63.43(d) and (e)):	
Attached, Document ID:	∑ Not Applicable
2. Good Engineering Practice Stack Height Anal	ysis (Rules 62-212.400(4)(d) and 62-
212.500(4)(f), F.A.C.):	
Attached, Document ID:	Not Applicable
3. Description of Stack Sampling Facilities: (Re only)	quired for proposed new stack sampling facilities
Attached, Document ID:	⊠ Not Applicable
Additional Requirements for Title V Air Opera	ation Permit Applications
1. Identification of Applicable Requirements	:
Attached, Document ID: App. 1	Not Applicable
2. Compliance Assurance Monitoring:	
Attached, Document ID:	⊠Not Applicable
3. Alternative Methods of Operation:	
Attached, Document ID:	∑Not Applicable
4. Alternative Modes of Operation (Emission	ns Trading):
Attached, Document ID:	⊠Not Applicable
Additional Requirements Comment	